



March 15, 2002

Joy M. Schaad
Director of Community Liaison
Council of Mayors Executive Committee
Chicago Area Transportation Study
300 West Adams St.
Chicago, IL 60606

Re: Oak Park Input to Development of Long Range
Regional Transportation Plan (2030 RTP)

Dear Ms. Schaad:

Thank you for your letter of February 8, 2002 requesting local community input into the development of the 2030 RTP. Continuous consultation and communication with local communities and residents is essential if the regional plan is to function effectively. On behalf of the Board of Trustees and the Village of Oak Park, I appreciate this opportunity to provide comments on the future long-term plan.

One of the "major infrastructure projects" listed in the 2020 RTP is the potential addition of HOV lanes to I-290 (the Eisenhower Expressway) from Austin Boulevard to I-88. This portion of the expressway runs through Oak Park. The HOV project is likely to bring a significant increase in traffic, with all of the attendant social, economic and environmental issues, and may actually cause some residents of Oak Park to lose their homes or businesses. Yet the detailed studies of potential alternatives and environmental impacts, required by federal regulations, have not yet been undertaken.

To date, the Village of Oak Park has seen no evidence that the HOV project is the best way to reduce congestion on I-290, or that it is even capable of accomplishing that objective. Other potential alternatives do not appear to have been considered seriously at this stage. Further, the Village is extremely concerned about the potential social, economic and environmental impacts of the I-290 HOV project on the Village and its residents. At a public meeting on March 6, 2002, representatives of IDOT stated that IDOT intends to comply with the federal requirements to evaluate alternatives and impacts, and that completion of Phase I of the project is not anticipated prior to December 31, 2004. The Village is encouraged by this development and intends to work closely with IDOT as the Phase I studies proceed. However, we hereby request that CATS take the following actions in the 2030 RTP to ensure that the I-290 HOV project will not move forward until all of the potential alternatives and related impacts have been thoroughly considered and addressed:

1. Removal or restriction of the I-290 HOV project. In accordance with the applicable federal regulations, the project must either be removed from the RTP, or the RTP must specify a "no-build" condition until the required studies have been completed.
2. CTA Blue Line Extension and Transit Alternatives. The 2030 plan should include extension of the CTA Blue Line as a potential new transit project that could provide a viable alternative to expansion of the Eisenhower Expressway. The Village also supports the inclusion of other transit alternatives into the 2030 plan, such as Metra capacity expansion, to promote the movement of people between the City of Chicago and the western suburbs.
3. Oak Park Cap. The 2030 plan should include a new project to cap the expressway in Oak Park as a potential means of mitigating adverse impacts if the HOV expansion project or any other major reconstruction of the I-290 corridor through Oak Park is pursued.
4. Oak Park Cap Study. CMAQ funding should be provided to update and expand a 1987 study of the feasibility of capping the expressway in Oak Park.

These actions are discussed in turn below.

HOV Project Restriction

For major projects such as the I-290 HOV expansion, the applicable federal regulations provide three major tools for evaluation of potential alternatives and impacts:

- A *major investment study* (MIS) identifies viable alternative means of attaining the relevant transportation goals and evaluates the costs and impacts of the identified alternatives (see 23 CFR 450.318).
- A *congestion management study* (CMS) evaluates the most efficient and effective means of alleviating current congestion on I-290 (see 23 CFR 450.320, 500.109).
- A *National Environmental Policy Act* (NEPA) study evaluates the potential environmental impacts of the alternatives identified in the other studies (see 23 CFR 450.318(f), 771.123).

So far as the Village is aware, none of these studies has yet been initiated for the I-290 HOV project. At a public meeting on March 6, 2002, representatives of IDOT stated that they are now preparing to begin a Phase I study for the I-290 project. In response to a question from Village counsel, the IDOT representatives indicated that the Phase I study will comply with each of the federal study requirements summarized above.¹ However, the Phase I study has only recently been initiated and IDOT does not envision completion of Phase I prior to the end of 2004.

Under these circumstances, the federal highway regulations require amendment of the RTP to either remove the I-290 project or specify a "no-build" condition until the required studies have been completed. The federal regulations require that the RTP "shall . . .

(8) For major transportation investments for which analyses are not complete, indicate that the design concept and scope (mode and alignment) have not been fully determined and will require further analysis. The plan shall identify such study corridors and sub areas and may stipulate either a set of assumptions (assumed alternatives) concerning the proposed improvements or a no-build condition pending the completion of a corridor or sub area level analysis under §450.318. In nonattainment and maintenance areas, the set of assumed alternatives shall be in sufficient detail to permit plan conformity determinations under the U.S. EPA conformity regulations (40 CFR part 51);"²

In proposing this regulation, the Federal Highway Administration explained:

In circumstances where a corridor or subarea study is anticipated as a means for assessing potential transportation improvements but is not complete, the plan may indicate for such areas that the design concept and scope (modes and alignment) are not fully determined. In these instances, the plan may stipulate a set of assumptions concerning potential improvements or a no-build condition. In the former, the level of detail concerning the potential improvement would need to be sufficient to sustain a conformity determination under 40 CFR part 51 (see 58 FR 3768, Jan. 11, 1993) and should represent the best judgment as to the likely improvement option. In some cases the option could be multimodal rather than a single mode option.

¹ With respect to environmental impacts, IDOT indicated that they do not now intend to prepare an Environmental Impact Statement (EIS), but will initially perform a less detailed Environmental Assessment (EA). Although the EA could lead to subsequent preparation of an EIS, the Village believes an EIS is required now because it is clear that the project is likely to cause significant environmental impacts (see 23 CFR 771.123(a)). The Village intends to address this issue with IDOT in the near future.

² 23 CFR 450.322(b)(8)(2001).

A subsequent corridor or subarea study could lead to further refinement of feasible options and the selection of the appropriate mode(s) and alignment(s) for preliminary engineering. This could result in a plan amendment. *The intent of the proposed plan requirement would be to provide a wide range of multimodal options for technical evaluation rather than fixing on a given mode by virtue of its intuitive appeal or initial apparent feasibility.* A no-build alternative could be later replaced, after appropriate study and justification, with a build option reflecting appropriate planning procedures and technical justification in the same fashion.³

This is precisely the situation now presented with respect to the I-290 HOV project. The project has been included in the RTP because IDOT believes it may be feasible, but none of the required studies of alternatives or impacts has yet been performed. In these circumstances, 23 CFR 450.322(b)(8) requires the RTP to state clearly that the required analyses have not been completed. It then provides two options for the description of the project in the RTP: the RTP may either specify a set of assumed alternatives, or it may specify a no-build condition. However, if the option to specify assumed alternatives is chosen, they must be described in sufficient detail to permit a conformity analysis under the governing EPA regulations.

In this case, it is not possible for the RTP to specify assumed alternatives to the I-290 project because the potentially viable alternatives have not yet been identified, certainly not in sufficient detail to permit a conformity analysis. Accordingly, until the required studies of alternatives and impacts have been completed, the RTP must either specify a no-build condition for the I-290 project or the project must be removed from the RTP.

CTA Blue Line Extension and Transit Alternatives

The Village of Oak Park believes that extension of the Blue Line should be considered as one potentially viable alternative to the I-290 HOV project. In conjunction with the North Central Council of Mayors, the Village is preparing an application to add the Blue Line extension to the 2030 RTP as a transit project for further evaluation by CATS. On February 26, 2002, the Council, of which Oak Park is a member, voted unanimously in support of the Blue Line extension. As you are aware, the 2020 plan designated this stretch of I-290 and I-88 out to Lisle as a future transit expansion study area, however, no studies have been started since the 2020 plans was adopted. Since further study may show that an HOV lane and a Blue Line extension could be mutually exclusive options, the prudent approach to regional planning is to consider all of the potential alternatives together in the context of the entire corridor, not just the HOV proposal and not just from Austin Boulevard to Mannheim. The Village also supports the consideration of other transit alternatives as part of the 2030 plan, such as Metra commuter rail capacity expansion, to promote the movement of people between the City of Chicago and the western suburbs. Physical improvements to existing Metra lines, specifically the Union Pacific West line, but

³ See 58 Fed. Reg. 12070-71 (March 2, 1993)(emphasis added).

possibly also the Burlington Northern Sante Fe, could result in significantly increased ability to reduce congestion on the regional highway system, specifically I-290, between the City of Chicago and DuPage County.

Oak Park Cap

Another potential alternative to the current HOV project is to construct a cap over the expanded expressway to reconnect the Village with park land, green space, commuter parking lots or other intermodal facilities over the expressway. The cap would be intended to mitigate air quality and other Oak Park existing and future impacts if the expressway is expanded or reconstructed, and to repair the chasm in the community that was created when the expressway originally was built. Apparently requiring the reconstruction of seven bridges, five of which have stations accessing the CTA Blue Line, the HOV project would have unique and significant impact on Oak Park. In addition this corridor through Oak Park, the only part of I-290 which is significantly below grade with retaining walls, could impact several adjacent parks and recreational facilities, a pending historic district, and business district at Oak Park Avenue already divided by the Expressway. The Village has submitted an application to add the Oak Park Cap to the 2030 RTP as a mitigation project for long-standing and potential I-290 corridor reconstruction or expansion for further evaluation. The project also deserves standalone consideration for the potential air quality benefits through the placement of intermodal facilities for bike, pedestrian, buses and commuter parking areas on top of the cap at grade level.

Oak Park Cap Study

In 1987, IDOT conducted an “air rights” study to consider the feasibility of reducing the air quality and other impacts of I-290 on the Village by capping all or most of the portions of the freeway that run through Oak Park. The Village has filed an application seeking CMAQ funding for a new study to revise and update the 1987 study and to review the current feasibility of constructing a cap to protect air quality in Oak Park as part of any expansion of the Eisenhower Expressway or major reconstruction of the I-290 corridor.

The scope of the new study would include: 1) update costs from the 1987 study to reflect current construction costs; 2) Relate the 1987 study to Phase One IDOT HOV plans that call for rebuilding and creating new Oak Park retaining walls throughout Oak Park, including reconstruction of seven Oak Park overpasses, two sets of exit/entrance ramps, and five access points to stops on the CTA Blue line, and document any incremental costs necessary to accommodate such a cap as part of IDOT reconstruction or expansion plans; and, 3) Study the feasibility of incorporating on top of the cap at Oak Park grade level pedestrian linkages, bike paths, surface level commuter parking and bus routes in conjunction with rebuilt enhanced transit stations. This would turn existing CTA stations, which are served by several bus routes, into enhanced intermodal uses that would promote use of alternatives to vehicle trips on the highway.

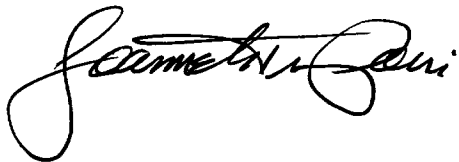
The purpose of this project is to further study a potential method of mitigating the Oak Park existing impacts, as well as additional impacts if I-290 is expanded or

undergoes other major reconstruction. In addition to mitigation of air quality and other impacts, use of the cap to encourage alternatives to SOV transportation would have the potential for significant trip reduction benefits.

Conclusion

The Village of Oak Park and its residents are extremely concerned that the I-290 HOV project may be allowed to proceed without the detailed studies of alternatives and impacts required by the federal highway funding regulations. We believe that the federal regulations require CATS to amend the RTP to either remove the project or specify a no-build condition until the required studies have been completed. In addition, we are preparing or have already submitted applications to include new projects in the 2030 RTP to evaluate extension of the CTA Blue Line and construction of a cap over the expressway through Oak Park. We have also applied for CMAQ funding to update and expand a 1987 study of the feasibility of the Oak Park Cap. We very much appreciate this opportunity to provide input to the 2030 plan, and we trust that CATS will give serious consideration to our proposals. If you have any questions about our proposals or would like to discuss them further, please contact Pete Dame in the Office of the Village Manager at 708.358.5778.

Sincerely,
VILLAGE OF OAK PARK

A handwritten signature in black ink, appearing to read "Joanne E. Trapani". The signature is fluid and cursive, with a large initial "J" and "T".

Joanne E. Trapani
Village President

CC: Beth McCluskey, Planning Liaison
North Central Council of Mayors