



September 20, 2005

Paula Thibeault, Executive Director  
Regional Transportation Authority  
Suite 1550  
175 W. Jackson Boulevard  
Chicago, Illinois 60604

Re: **Draft Final Travel Market Analysis for Cook-DuPage Transportation Corridor**

Dear Director Thibeault:

The Village of Oak Park submits the following comments on the August 2005 draft final Cook-DuPage Corridor Travel Market Analysis. Our comments are based on input from Village citizens and from the Village I-290 Eisenhower Citizen Advisory Committee, which includes various individuals with related expertise, as well as the attached comments of Douglas A. Kerr.<sup>1</sup> Our comments may be summarized as follows:

- The final Phase 1 Market Analysis should not be used to recommend adoption of the HOV alternative or to eliminate potential transit alternatives. Such an approach is inconsistent with the 2030 Regional Transportation Plan and the purpose of a travel market analysis. Potential alternatives should not be defined or evaluated until the later phases of the corridor study intended by the Cook-DuPage Study Management Plan to identify, review and select the most appropriate alternatives.
- If the final report continues to compare HOV and transit alternatives, a more realistic definition of the alternatives should be employed. The analysis should not compare the best theoretical performance of HOV lanes against the problems apparent in the existing transit system. Potential improvements to the existing transit system should be considered, as should potential HOV detriments such as “induced demand.” At a minimum, a thorough modeling analysis should be performed before any conclusions are drawn with respect to the anticipated performance of HOV lanes or the ability of the market to sustain effective transit alternatives.

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<sup>1</sup> Mr. Kerr is a professional engineer and transportation planner recently retired from a twenty-eight year career with the Federal Transit Administration (FTA). He has broad range of knowledge in all aspects of mass transit, including new starts, light, rapid and commuter rail, fixed route bus, paratransit, facilities planning and disability access. During his career with the FTA, Mr. Kerr served as chief planner in a regional office, director of a metropolitan office, and division chief and office director in the planning, engineering and program management offices in FTA headquarters.

- The definition of alternatives, the potential options available to meet demand, the criteria for selection of options to meet travel demands identified in Phase 1 and the relationships between potentially feasible options all should be determined in Phases 2 and 3 of the study with community consensus and involvement through a Corridor Council involving local elected officials.

These points are discussed in detail below.

### **Purpose of Travel Market Analysis**

As discussed in the attached comments of Mr. Kerr, the purpose of a Phase 1 Market Analysis is not to eliminate alternatives but to assess the market in preparation for analyses of alternatives in the later phases. Rejection of transit alternatives at this early stage is not appropriate and is inconsistent with the essential purpose and process of the Management Plan adopted for the corridor study.

Rejection of transit alternatives also is inconsistent with the 2030 Regional Transportation Plan (RTP) for the Chicago area. The RTP discusses a number of potential transit options for the corridor and states that “all RTP strategies, combined with several major project recommendations, should be considered in this study” (p. 203). The RTP approach reflects the applicable guidance of the Federal Highway Administration (FHWA). Where a regional plan includes a corridor study, FHWA has stated that “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.”<sup>2</sup> This is precisely the problem presented by the draft market analysis.

### **Analysis of Transit Alternatives**

As discussed in the attached comments of Mr. Kerr, the analysis accepts the current transit system as it presently exists, and does not discuss improvements that may be developed in later alternatives to serve the corridor markets. Accordingly, it is not appropriate for purposes of comparison with the proposed HOV alternative. In addition, the draft report employs an inappropriate definition of “transit alternative” that cannot be satisfied by anything other than a highway and ensures that only the proposed highway expansion would qualify as an acceptable alternative. If the final market analysis continues to discuss potential alternatives, a broader definition of what constitutes a reasonable transit alternative to highway construction, such as a combination of highway and transit improvements, should be employed.

### **Analysis of HOV Alternative**

Mr. Kerr’s comments explain that the discussion of the capabilities of HOV lanes in the draft report is based on theoretical capability which does not reflect the nationwide experience. Further, there is no experience in Illinois with HOV lanes, and the estimated number of vehicles that an HOV lane theoretically would carry does not appear to be accurate. Projected HOV capacity was not modeled, but the report assumes 2000 vehicles per hour, citing 6000 passengers

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<sup>2</sup> 58 Fed. Reg. 12070-71 (March 2, 1993).

(18,000 over a 3 hour peak, p. 6-14) as the basis of comparison to transit alternatives. However, the 1998 IDOT feasibility study for the HOV alternative, cited throughout the draft report, projected HOV3 lane usage during peak hours at 1100 vehicles per hour in 1996 and 1250 by 2010 (p. I-7 of the HOV Lane Feasibility Study). In fact, a range of 600-800 vehicles per hour is more typical of where employment of HOV lanes have been documented by studies to be effective. This alone significantly undermines the comparison to “comparable” transit alternatives and indicates the absence of any substantial basis for the HOV conclusion. In addition, the number of vehicles used as a benchmark for comparison to transit in the draft RTA report represents the maximum capacity of a highway lane, which would slow down traffic to such an extent that HOV lanes would not be effective. Therefore, use of the 2000 vehicle figure provides an artificially inflated basis of comparison. Finally, the draft report overstates efficiency of HOV lanes compared to practical examples and relies on unsupported assumptions as to the general effectiveness of HOV lanes, particularly in a region which has no supportive system (or other examples) for HOV lanes, education, enforcement, or culture.

In fact, both the experience in Chicago and other studies on a national level suggest that HOV lanes would not be effective in the I-290 scenario. A primary issue is whether the HOV proposal is a short-term solution that will soon be inadequate and require replacement with other highway or transit alternatives that could be adopted now and would avoid the interim environmental impacts. The proposed HOV lanes may not be effective in reducing congestion on I-290 and may actually lead to increased congestion. This is supported by national studies suggesting that the HOV lanes would actually increase the current congestion on the freeway, as well on local arterials near entrance/exit ramps and popular destinations. A post-project report by an IDOT official publicly stated that the "Hillside Strangler" project is causing such effects. Travel times on the Eisenhower Expressway were not reduced as expected by those costly improvements, and have simply relocated the congestion. And the Illinois Tollway Authority has not yet even begun to implement its plans to expand I-88 from three to four lanes with open tolling lanes from the western suburbs into Hillside, where I-88 feeds into I-290. The Tollway's plans are likely to contribute to recreating the conditions that the Hillside Strangler project was intended to alleviate at that merge point.

These effects are consistent with much of the national literature on the effects of HOV lanes and the resulting "induced demand."<sup>3</sup> Studies of induced demand indicate that shortly after the new lanes or road are opened traffic increases by 10%-50% of the new capacity as public transit or carpool riders switch to single occupancy driving, or decide to take more or longer trips or change routes. In the longer term (3 years or more) the induced travel rises to 50%-100% of the new capacity. The added traffic increases congestion and related pollutant emissions not only on the primary roadway but also on local streets at major entrance or exit ramps and popular destinations.

The studies of induced demand indicate that new HOV lanes clearly have the potential to increase congestion and related pollution, particularly in the absence of adequate modeling to account for these factors. These issues should receive thorough consideration in the final RTA report. At a minimum, a thorough modeling analysis should be performed before any

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<sup>3</sup> A detailed discussion of the national studies is provided in the I-290 HOV Impacts Report prepared by the Village in 2003.

conclusions are drawn with respect to the anticipated performance of HOV lanes or the ability of the market to sustain effective transit alternatives.

### **Market Analysis**

The market analysis in the draft report is similarly skewed in favor of the HOV option. Apart from the unsupported rejection of transit options, the market analysis focuses entirely on HOV lanes as an option. No other options receive any significant discussion. The Village of Oak Park believes that all potential options to meet the travel demands identified in Phase I should be collected and evaluated in Phase II, and preferred options should then be recommended by communities in the corridor using a wide variety of agreed upon decision points and criteria. In its August 8, 2003 comments to the RTA on the draft Management Plan, the Village pointed out this flaw in the study process, which singles out this single option for analysis prematurely. Failure to address this comment has resulted in a flawed draft report in which the conclusion about HOV lanes and transit alternatives and the criteria to reach the conclusions are undefined and unsupported.

The regional model used as the basis for the conclusions in the draft report is not specific to the Cook-DuPage corridor or to the proposed improvements. The model can only predict existing patterns of movement on existing system, and is not capable of predicting how travel behavior and land use might change if there were a transit option to I-290. In addition, it is not possible to model potential HOV lane effects using the CATS regional modeling software, nor has the RTA conducted any modeling of the I-290 HOV lanes to support its analysis. Nowhere in the report is the data supporting the existence of demand to create three plus people carpools necessary to utilize HOV lanes, nor for the recommended transit service on an HOV lane.

Specifically, the regional model does not provide support for the HOV recommendation found in Chapter Five stating “Mobility improvements for the traditional commute should include the following characteristics: increase effective capacity on the Eisenhower Expressway ... and new (additional) restricted lanes (e.g. HOV, transit, pass through traffic, trucks,etc.). Information to support this conclusion is not found in the report and is premature to include in a travel demand analysis. It also appears internally inconsistent with other findings in the draft report as written. While stating that there is insufficient demand for transit options in lieu of HOV on I-290, the draft proposes a transit service on the HOV, yet finds a demand for transit along the route of the HOV at the mid-point (Maywood) and at an endpoint (Oak Brook). At best, these conclusions are confusing. The recommendation for a transit service on the HOV is particularly vexing. While offering no data to support a demand for a transit service on the HOV since the report indicates there is not a document unmet demand for a traditional commute transit service, the report concludes that such a service on the HOV lanes could address the traditional commute while meeting the documented demand for transit in the reverse commute market. Under that reasoning, a transit service such as an extension of the Blue Line west of Forest Park along I-290 could serve that same purpose. Yet there discussion of this potential option is virtually ignored while Metra rail improvements, bus and other mechanisms to reduce traditional commute highway demand on I-290 are suggested. The existing CTA el line serves this same purpose in the corridor until it stops at Forest Park, but potentially could be increase commuter ridership in

the I-290 corridor with enhanced frequency, quality of connections, and extended reach into Maywood and Oak Brook. A CTA el line could hold up to 1000 people per train, departing every three minutes, which indicates the capacity of CTA el improvements when compared to highway capacity improvements holds up favorably to the figures cited in the draft report, and should clearly be considered an alternative. The absence of even a discussion of a potential of CTA rail option among a list of at least 10 other “recommended” options (p. 5-20) is highly questionable, and raises issues about objectivity. All of which underscores how discussion of options to meet demand are best addressed in future phases.

Further, even if HOV is a feasible option that could work, it does not follow that HOV lanes should be the highest priority option of all the very costly options on the table in the corridor. There are many non-market related considerations such as energy usage, environmental impact, community impact, land use patterns that should be considered when making major investment decisions on transportation.

In sum, the draft RTA market analysis needs substantial revision of the conclusions about HOV lanes. The conclusions rejecting transit as potential options to help address I-290 congestion and supporting construction of HOV lanes on I-290 should be eliminated, as they are not supported and not supportable without the more detail process and review planned for the future phases. No other options other than HOV are reviewed in this study and no modeling was performed on this option to determine if the purported effects would actually occur. As currently drafted, the report could be cited by those not familiar with the details as evidence that there is no reason to give any further consideration to a transit service along I-290 in the later phases of the corridor study. Such an approach is completely inconsistent with the intent of the study, as expressed in the 2030 RTP and the Corridor Study Management Plan. The definition of alternatives, the potential options available to meet demand, the criteria for selection of options to meet travel demands identified in Phase 1, and the relationships between potentially feasible options all should be determined in Phases 2 and 3 of the study with community consensus and involvement through a Corridor Council involving local elected officials.

Thank you for your consideration of the Village of Oak Park’s comments. We appreciate the opportunity to constructively participate in this process, and hope to continue to positively contribute in future phases of the RTA study.

Sincerely,  
VILLAGE OF OAK PARK



David G. Pope  
Village President

# Kerr Consulting LLC

Transportation Project Development, Government Relations, Strategic Planning

September 16, 2005

President David G. Pope  
Village of Oak Park  
123 Madison Street  
Oak Park, IL, 60304

Re: **Draft Final Report - Travel Market Analysis for Cook-DuPage Corridor**

Dear President Pope:

As you requested, I have reviewed the draft final Travel Market Analysis prepared by the Regional Transportation Authority (RTA) for the Cook-DuPage Transportation Corridor. The report concludes that “no identifiable market was found of a scale sufficient to sustain a transit alternative to the HOV lanes, therefore, multimodal use of the proposed HOV lanes can and should serve as an additional transit option to improve mobility for commuters of Cook and DuPage counties” (p. ES-1). I believe that such a conclusion is inappropriate for this first phase of the study, which is intended to analyze the travel market rather than to propose or reject potential alternatives for serving the market. In addition, I do not find any substantial support for this conclusion in the draft report. My specific comments are as follows.

## **Purpose of Phase I Market Analysis**

The RTA’s February 2004 Program Management Plan lays out how the Central Cook-DuPage Corridor Study is to be conducted. This report is on Phase 1, the Market Analysis. This phase is to analyze the corridor travel markets. It is part of a multi-year 3-phase study design. Figure 1 of the Management Plan (p. 5) indicates that the purpose of the Phase 1 analysis is limited to analyzing corridor travel markets and selecting priority markets for improvement. The market analysis phase is not intended to eliminate alternative improvements or even to propose them. This report clearly states that there is no feasible transit alternative to the HOV lanes on the Eisenhower Expressway. This sort of conclusion is not intended at this stage of the study process.

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The next step, Phase 2, is to lay out a long list of possible improvements to serve the corridor market and to analyze those options based on developed corridor planning standards to come up with a short list of alternatives to evaluate in detail in Phase 3. There should be no elimination of alternatives in Phase 1.

### **Analysis of Transit Alternatives**

The evaluation of CTA and Pace bus service in this report, while inappropriate at this phase, is based solely on the shortcomings of existing service, such as operating boundaries, service frequencies, inconvenient schedules and segmented routes (p. ES-4). The analysis does not discuss service improvements that may be developed in later alternatives to serve the corridor markets. Accordingly, it is not appropriate for purposes of comparison with the proposed HOV alternative.

In addition, the draft report employs an inappropriate definition of “transit alternative.” The question put for RTA response is stated as follows: “Is there a travel market that could potentially be served by transit, eliminating the declared need for an HOV lane” (p. 6-12). The report goes on to conclude “for transit to be effective, it must represent a new and attractive option that directly connects both the origin and destination trip ends for a large amount of travelers” (p. 6-14). These definitions of the transit alternative cannot be satisfied by anything other than a highway. Point to point transportation provided by highways cannot be considered equivalent to a transit alternative bound to fixed routes or stops. The report’s definition of transit alternative defines away the issue and ensures that only the proposed highway expansion would qualify as an acceptable alternative. If the final market analysis continues to discuss potential alternatives, a broader definition of what constitutes a reasonable transit alternative to highway construction, such as a combination of highway and transit improvements, should be employed.

### **Analysis of HOV Alternative**

The discussion of the capabilities of the HOV lanes in this report, while also not appropriate at this phase, is based on theoretical capability that is not the experience around the country. There is no experience in Illinois. HOV requires a culture of ride sharing in car pools that has not been successful in many markets and may not succeed in the Chicago region. HOV is difficult to enforce, and 20% violations are common. In most cases, HOV 3 is eventually reduced to HOV 2 under citizen pressure, which would reduce the benefits predicted in the draft report. For these reasons, the HOV analysis in the draft report is not an appropriate basis for comparison with potential transit improvements. If the final report continues to discuss the HOV alternative, a more realistic description of HOV capabilities should be employed.

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In sum: (1) the final Phase 1 Market Analysis should not be used to eliminate potential alternatives, which should not even be defined until the later phases of the corridor study; and (2) if the final report continues to compare HOV and transit alternatives, a more realistic definition of the alternatives should be employed and the analysis should not compare the best theoretical performance of HOV lanes against the existing transit system absent potential improvements.

Sincerely,

*Douglas A. Kerr*

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