



May 2, 2003

Mr. Aristide Biciunas
Executive Director
Chicago Area Transportation Study (CATS)
300 West Adams Street, 2nd Floor
Chicago, Illinois 60606

Re: **Comments of the Village of Oak Park on Proposed Long Range Regional
Transportation Plan (Shared Path 2030 RTP)**

Dear Mr. Biciunas:

The Village of Oak Park submits the following comments on the draft recommended 2030 RTP released for public comment on April 7, 2003. The Village of Oak Park appreciates this opportunity to provide comments on the future long-range plan. Continuous consultation and communication with local communities and residents is essential if the regional plan is to function effectively.

One of the "major infrastructure projects" listed in the current (2020) RTP and in the draft recommended 2030 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. 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. Yet the federally required detailed studies of potential environmental impacts and alternatives, several of which are also included in the draft 2030 RTP recommendations, have only recently begun. The Village is concerned that the I-290 HOV project had been included in the current and proposed RTP, particularly without any reference to the pending studies or the possibility of alternative approaches. We have not seen any convincing evidence that the HOV project is the best way to reduce congestion and improve mobility between Chicago and the western suburbs along I-290. In particular, due to its macro level approach to developing the RTP, no modeling comparing project specific alternatives for the I-290 corridor have been completed by CATS that establish the HOV concept as superior over other transit options that would justify its inclusion over other approaches.

To summarize the comments, the Village reaffirms its position on the I-290 HOV project relating to the 2030 RTP plan as submitted in March of last year (attached) and submits the following supplementary comments based on the just released CATS recommendations. Given the Village's concerns about the HOV project and the early stage of development of studies to ascertain the most appropriate means to address mobility needs in the I-290/I-88

corridor by IDOT and RTA, the Village of Oak Park urges CATS to designate all of the potential projects in this area as the Central Cook - DuPage Multimodal Study Corridor, and group them together in a single discussion. The description of the corridor should make it clear that the best mechanism or combination of mechanisms to address the transportation needs in this corridor with the least impact on communities have not yet been determined, and will not be unless and until the required studies have been completed and an optimal long-term alternative (or package of alternatives) that will address the long-term transportation needs of the whole corridor selected by corridor communities. Consequently, the Village of Oak Park strongly supports the proposed transit options over highway expansion in this corridor and urges retention of all of the potential five transit projects in the final RTP. Especially given that this recommended draft is not yet financially constrained, if any projects in the corridor are eliminated from the final 2030 RTP it should be the proposed I-290 highway and I-88 tollway expansions. Finally, the Village urges that the Oak Park Cap project submitted for inclusion in the 2030 RTP be listed as a project in this corridor. These comments are discussed in detail below.

We do note that in reviewing the draft recommended RTP, we were pleased to discover that many of our suggestions have been accepted. Most importantly, the draft circulated to the CATS RTP Committee on March 12 now references the potential I-290 HOV project in conjunction with transit options previously suggested by the Village such as the CTA Blue Line Extension from Forest Park, the Cermak Road PACE BRT, the Metra UP-West Extension *and Capacity Upgrade (emphasis added)*, as well as several other additional projects that would constitute a new multimodal transportation corridor from downtown Chicago to the western suburbs. However, the discussion of the various potential projects in this Central Cook – DuPage Multimodal Corridor does not make it clear that the required federal studies are still in the early stages, nor does it identify them as part of a comprehensive corridor study being launched by the RTA and IDOT that is intended to constitute the required Major Investment Study. In addition, the recent proposal does not mention the Oak Park Cap as one of the potential projects for the Central Cook – DuPage Multimodal Corridor even though the Village has received an IDOT Illinois Tomorrow grant to update and expand a 1987 cap study to further develop the feasibility and determine the scope of such a project.

Central Cook - DuPage Multimodal Corridor

Some of the language in the draft 2030 RTP (as represented by the March 12 draft) states that it is intended to place the future transportation system in a regional context and to accommodate growth in part through increased reliance on multimodal capacity. With respect to the western suburbs, the draft plan appears intended to establish an east-west multimodal corridor consisting of the following potential projects:

- ◆ CTA Blue Line westward extension to Lisle
- ◆ Metra Union Pacific West Line upgrade and extension
- ◆ I-290 HOV highway expansion
- ◆ I-88 tollway expansion
- ◆ Ogden Avenue Transitway
- ◆ Cermak Road Bus Rapid Transit

Furthermore, the DuPage J Line Bus Rapid Transit line proposal included as a recommended project in the RTP is largely within the planned study corridor. This project will be a part of the RTA study now underway, and should be considered and listed as part of this multimodal corridor which the RTA has termed a part of their Central Cook – DuPage Corridor Study.

The descriptions of these projects, however, are included in scattered sections of the draft document presented to the CATS RTP Committee on March 12 and there is no comprehensive or coordinated discussion of the overall plan for what should be consistently known as the Central Cook – DuPage Multimodal Corridor. There is no discussion of how these projects might (or might not) be part of a comprehensive approach to reducing congestion and improving transportation choices in the corridor. Further, there is no indication that all of these projects remain in the early (Phase I or feasibility) study stage, though the draft document does state at the beginning that all of the "major capital projects" should be considered as recommendations and are included in the plan so that funding for the long-range studies can commence or continue. Of particular concern is that there is no mention at all in the April 7 documents CATS made available for public review of a multi-modal corridor in this area.

For ease of understanding and clarity of purpose, the Village recommends that all of the potential projects comprising the Central Cook - DuPage multi-modal corridor be addressed in one discussion that describes the projected needs of the corridor and how the various recommended projects would be coordinated or evaluated to meet those needs. For this (and other) transportation corridor(s) identified in the RTP, a full description of the context-sensitive rationale for each project and their status should be given. The overall goals for the corridor should also be clear, and how each project may serve to meet those goals. The background information for this corridor should make it clear that an evaluation of alternative service levels, design and community and environmental priorities of each of the potential projects is needed and should be considered in an integrated, not piecemeal fashion. The RTP should indicate that an Environmental Impact Statement for the HOV project is needed and has not yet been conducted as required. The RTP should also indicate that the RTA-IDOT corridor study underway will select the "preferred alternative or combination of alternatives from the already identified projects or alternatives that are yet to be developed as part of the study." When the preferred alternative is selected with the direction of corridor communities and the public, the RTP can be amended to reflect that outcome.

We believe such an approach would be consistent with the governing federal regulations, which provide 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)."¹

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.

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.²

We believe the intent of these federal regulations would best be fulfilled by incorporating into the text of the RTP an integrated discussion of all the potential Central Cook - DuPage corridor projects, making clear that they are still in the early study phase. In that regard, we invite your attention to the attached excerpts from the regional transportation plans for New York City and Seattle, WA, both of which use a variation of this approach. In these plans, potential projects are categorized as "candidates" or "future" according to the status of the planning and financing review, and include processes that do not allow a project to be added to the plan as "approved" until full environmental and fiscal review is completed. Other notable qualities of these plans are that they clearly show that planning is conducted on a corridor basis and investigates all modes of transportation, recognize the importance of considering impacts of projects and considering the design context, and state the

¹ 23 CFR 450.322(b)(8)(2002).

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

importance of tying transportation investments to land use policy. Finally, they incorporate timeframes into the description of the projects, a type of prioritization that the Village recommends for the Chicago area's plan. The Seattle plan recently was selected by the American Planning Association as the winner of its 2003 Outstanding Planning Award.

I-290 HOV

After the Village of Oak Park comments were prepared last year, the citizens committee that assisted in the development of that position paper worked with Village residents and officials to prepare its own preliminary analysis of the potential impacts of the proposed I-290 HOV project on the Village. I am pleased to enclose a copy of the committee's initial report, titled "Report on the Potential Impacts of the Proposed Eisenhower Expansion" (December 2002). This preliminary effort identifies the following major potential impacts of IDOT's HOV proposal for I-290:

- Significant potential to undermine the status of the Village as a home rule community and to disrupt the Comprehensive Village Plan and related zoning ordinance for determining how it will shape the future of and protect the value of its housing, transportation and parking, public facilities and services and economic development;
- Inconsistency with regional growth policies developed by the Northeastern Illinois Planning Commission and plans of the Chicago City Government that seek to promote transit usage, and minimize the urban sprawl that highway expansion encourages;
- Adverse impacts on energy requirements and conservation of depletable natural resources by accommodating cars and trucks versus more energy efficient use of public transit;
- Adverse public health and safety impacts, including potentially significant increases in the exposure of Village residents to ozone, nitrogen oxides, carbon monoxide, particulate matter, hydrocarbons, noise pollution, diesel emissions and at least 20 other carcinogenic substances contained in particles or other emissions from mobile sources or road dust;
- Increased building and materials damage in a community that contains over 300 historically or architecturally significant buildings;
- Significant potential for environmental injustice.

Additionally and more specifically, Oak Park's concerns about the HOV proposal as detailed in the attached study include:

- The effectiveness of HOV lanes is mixed across the country and untried in the Chicago area. As the only proposed HOV lane in the entire region over the next 30 years, it stands as an isolated experiment unlikely to be

successful. To be accepted into the habits of urban drivers, a whole system of HOVs with an educational and enforcement and other support mechanisms would be necessary, which is unlikely for a single and short stretch of HOV as proposed for Chicago on I-290.

- Even under the most optimistic assumptions, the benefits of a single HOV project of such a short length are marginal in terms of time savings, but the negative impacts are significant and with a large capital cost. Instead of time savings, however, it is more likely that the proposed HOV lanes will induce driving demand, attract more vehicles, and simply move or exacerbate the traffic congestion and bottlenecks as has occurred with the bottleneck on I-290 at Hillside, especially when the proposed I-88 tollway lane expansion funnels more cars onto I-290 recreating the conditions the Hillside Strangler project was intended to relieve.
- Expansion of I-290 in this corridor contradicts the emphasis on expanding transit access into the City of Chicago as spelled out under the Central Area Plan. The Central Area Plan also points out that there is simply no place to park the vehicles that expanded capacity of this main artery would bring into the Loop.
- Expanding I-290 also contradicts the long-standing principle in the Chicago metropolitan area that radial highways should not be expanded that are adjacent to current or potentially extended transit lines³, such as the CTA Blue Line El service to Forest Park located in the I-290 right-of-way, and also that the duplication of public transportation services should not occur.

Furthermore, it seems apparent that it is unlikely that all of the projects listed as part of this corridor will be built. Physical constraints are likely to make certain projects mutually exclusive and financial constraints are likely to preclude construction of all these projects. For example, alternative studies may indicate that the most fiscally prudent and efficient location for the extension of the CTA Blue Line El is within the existing I-290 and I-88 right of way where added vehicle lanes are proposed. Some of these options proposed in this corridor may be a duplication of another service or undermine others' potential market if not coordinated by thorough planning studies. Finally, there is clearly not a consensus of opinion in support of the I-290 HOV project, not only in Oak Park, but also within the entire I-290 HOV corridor represented by the North Central Council of Mayors which has endorsed inclusion of all of the proposed transit projects in this corridor into the final RTP as a priority over the highway and tollway expansion projects in this corridor. Lack of public support is also evidenced by the regional transportation recommendation reports of Center for Neighborhood Technology and Metropolis 2020 both of which criticize highway expansions in favor of transit alternatives, specifically noting the I-290 Hillside Strangler project. In conclusion, the Village of Oak Park supports inclusion of the transit projects in the corridor for inclusion with priority over I-290 highway and I-88 tollway expansion in order to provide transportation options that are more likely to be effective with less impact on the environment and communities like Oak Park for all the reasons stated above.

³ Principle Espoused by Former Illinois Secretary of Transportation Kirk Brown, Address at "Connecting a Greater Chicago" transportation conference, Chicago, Illinois, November 15, 2002

Oak Park Cap

As discussed in last year's comments, another potential project that should be considered in conjunction with any renovation of I-290 through Oak Park is construction of a cap over the expressway to reconnect the Village with park land, green space, commuter parking lots, bicycle and other intermodal facilities designed to increase transit alternatives to vehicular use. The cap would be intended to mitigate air quality and other existing and future impacts on Oak Park if the expressway is expanded or reconstructed, to repair the chasm in this fully developed community that was created when the expressway originally was built, and to provide additional transportation benefits through inclusion of multi-modal facilities on the top of the cap. The project would provide congestion mitigation and air quality benefits through the addition of the new intermodal facilities on top of the cap at grade level, and has the potential for significant auto trip reduction benefits.

In 1987, the Illinois Department of Transportation (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 portions of the freeway that run through Oak Park.⁴ Last year, the Village was awarded \$225,000 in federal and state funding through the Illinois Tomorrow program (with a \$25,000 matching contribution from the Village) to revise and update the 1987 study and to review the current feasibility of constructing a cap to protect the air quality in Oak Park as part of any expansion of I-290 or major reconstruction of the I-290 corridor. The scope of the new study will include: (1) update costs from the 1987 study to reflect current construction costs and develop a recommended scope for the project; (2) integrate the cap with IDOT's Phase I planning process for the Eisenhower; and (3) study the feasibility of incorporating, on top of the cap, 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 truly intermodal facilities that would promote the use of alternatives to highway vehicle trips.

Given the potential importance of the Oak Park Cap as a measure for mitigating both traffic congestion and adverse environmental impacts, and considering the significant federal funding that has now been allocated to further study of the cap, the cap should be included in the RTP as a potential project for the Central Cook - DuPage multi-modal corridor. We believe that inclusion of the cap in the RTP is required by the governing federal regulations, which require the RTP to "reflect a multimodal evaluation of the transportation, socioeconomic, environmental and financial impact of the overall plan, including all major transportation investments . . ."⁵ The RTP must reflect "the area's overall social, economic, environmental and energy conservation goals," and must include a financial plan that "shall address the specific financial strategies required to ensure implementation of projects and programs to reach air quality compliance."⁶ These provisions effectively require inclusion of the cap in any RTP that contemplates expansion or significant reconstruction of the portions of I-290 that run through the Village.

⁴ IDOT, "Oak Park Air Rights Feasibility Study" (September 1987).

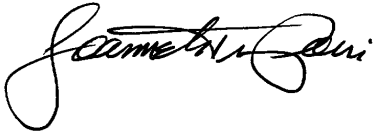
⁵ 23 CFR 450.322(b)(7)(2002).

⁶ 23 CFR 450.322(b)(9), (11)(2002).

Conclusion

The Village of Oak Park and its residents remain 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 are pleased that the proposed 2030 plan appears to create a new Central Cook - DuPage multimodal corridor that would include consideration of many projects in addition to the proposed I-290 HOV lanes. However, the RTP should provide an integrated statement of rationale for the corridor and the proposed projects, and should make it clear that all are in the initial (Phase I or feasibility) study phase. In addition, the Oak Park Cap should be added as one of the potential projects in the new Central Cook - DuPage corridor. 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



Joanne E. Trapani
Village President

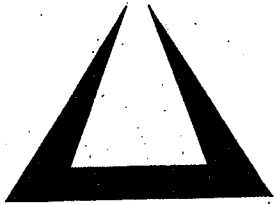
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Enclosures

PUGET SOUND REGIONAL COUNCIL – DESTINATION 2030
<http://www.psrc.org/projects/mtp/dest2030links.htm>

NEW YORK METROPOLITAN TRANSPORTATION COUNCIL
<http://www.nymtc.org/plan.html>

**NORTH CENTRAL COUNCIL OF MAYORS
RESOLUTION NC 04-04**

**A RESOLUTION SUPPORTING THE SHARED PATH 2030
REGIONAL TRANSPORTATION PLAN**



**NORTH CENTRAL
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President, Village of Westchester
Council Chairman

BETH McCLUSKEY
Council Liaison

WHEREAS, the North Central Council of Mayors has been designated the appropriate local official as defined in the Federal Highway Acts of 1970, 1973, and 1976 and the Surface Transportation Acts of 1979, 1982, 1986, 1991, and 1997 to select routes and projects for improvement on the Federal Classification System and on STP eligible routes; and

WHEREAS, the Council has been following the development of the 2030 RTP with great interest and would like to support certain regional transit, highway, study proposals; and planning principles; and

WHEREAS, the highway proposals we support include the completion of the Elgin-O'Hare Expressway and West O'Hare Bypass project as well as improvements along the Tollways including proposed exit ramp at North Avenue for eastbound traffic collection; and

WHEREAS, the transit proposals we support include the Inner Circumferential Rail Line, a project which would provide enhanced access to the two regional airports for communities in western cook county; and

WHEREAS, commuter alternatives that could reduce congestion and enhance mobility are so essential to the North Central region and the RTA multi-modal corridor study along I-290/I-88 will be vital to determining the best mechanism or combination of mechanism by which to make improvements; and

WHEREAS, numerous transit projects we support within the RTA multi-modal corridor are proposed including the CTA Blue Line extension from Forest Park to Lisle, the Metra Union Pacific West Line upgrade and extension, Ogden Avenue Transitway, Cermak Road Bus Rapid Transit, and DuPage J Line Bus Rapid Transit; and

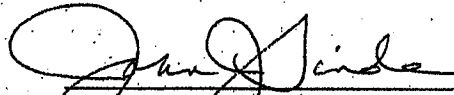
WHEREAS, the aforementioned transit projects and other new or expanded commuter services in this corridor would benefit our communities more than I-290 and I-88 expansion and the negative impacts associated with increased vehicle trips on the communities in this corridor and the increased sprawl in the region that would be accommodated with these roadway expansions; and

WHEREAS, any major transportation project should be designed to fit within the context of the community with fullest possible community participation, and should advance local land use and development plans, and should include a full assessment of environmental impacts and project mitigation as an integral part of the planning for every potential project;

NOW, THEREFORE, BE IT RESOLVED that the North Central Council of Mayors supports the aforementioned projects and proposals for inclusion in the 2030 Regional Transportation Plan.


BE IT FURTHER RESOLVED that the North Central Council of Mayors will forward copies of this resolution to the Chicago Area Transportation Study.

PASSED by the North Central Council of Mayors at a regular business meeting thereof held on the 29th day of April 2003.



John J. Sinda, Chairman
North Central Council of Mayors

ATTEST:



Beth McCluskey, Council Liaison
North Central Council of Mayors



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.

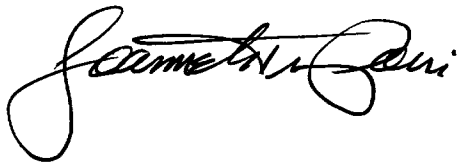
The purpose of this project is to further study a potential method of mitigating the Oak Park existing impacts, as well as additional impacts if I-290 is expanded or

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