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Michelle Ryan, AICP
Regional Transportation Authority
Cook DuPage Corridor Study
175 W Jackson Boulevard, Suite 1550
Chicago, IL 60604

Re: June 2006 Draft Options Feasibility Documents

Dear Ms. Ryan:

This letter offers the comments of the Village of Oak Park on the draft Options Feasibility documents issued for public review and comment in June 2006.

In comments on the February 2006 draft of these documents, the Village found that the February draft was a good first step, but substantial improvement was needed in several areas. We believe that the June 2006 draft is substantially improved, and we appreciate the opportunity to continue to work RTA in the development of this critically important study. However, we also see a need for additional improvements as discussed further below.

Goals and Objectives

Our comments on the prior draft found that it did not provide a clear and comprehensive set of criteria for evaluating and selecting feasible options, and minimized consideration of key factors such as land use and public health or environmental impacts. We also commented that RTA should use the federal criteria for funding of major capital projects as the primary transportation-based criteria, supplemented by the local corridor planning standards to be developed by the RTA Working Group.

We are pleased to see the following statement in the description of the study purpose that now appears on the RTA website: "Because the travel needs of the Corridor are of a magnitude that may warrant a major capital investment (capital projects over \$100 million), the study will follow a planning process consistent with Major Investment Study and Federal Transit Administration (FTA) New Starts requirements." We urge inclusion of this or a similar statement in the Statement of Purpose and need, as well. As discussed in our prior comments, the current regulations of the Federal Highway Administration and the Federal Transit Administration require evaluation of the following factors for all major capital projects:

- The effectiveness and cost-effectiveness of alternative investments or strategies in attaining local, state and national transportation goals and objectives;
- The direct and indirect costs of reasonable alternatives;
- Mobility improvement;

- Social, economic and environmental effects;
- Safety;
- Operating efficiencies;
- Land use and economic development;
- Financing;
- Energy consumption.

The Village continues to believe that a comprehensive analysis of these factors is required both to ensure an effective and successful study and to secure federal funding for the options eventually selected. The current draft goals and objectives appear to address most if not all of these factors, at least indirectly; however, we are concerned that development of the corridor planning standards referenced in Goal 4 may be rushed or otherwise diminished in importance by other project timeline demands, such as option evaluation and advancement of preliminary recommendations, and also believe that additional clarity is needed in the areas of public health and environmental impacts.

The Village strongly supports development of locally-oriented corridor planning standards to supplement the traditional transportation-based criteria, and intends to be involved actively in the development of the corridor standards. The Village is pleased to see a continuing emphasis on development and application of corridor planning standards. Specifically, Goal 4 now includes the following Objective 4: "Maximize achievement of Corridor Planning Standards (supplemental criteria that reflect shared local values and preferences)." The Village urges continued emphasis on development and compliance with reasonable corridor planning standards, and implores the RTA to provide a reasonable schedule within which the Corridor Planning Standards Committee will be able to complete its important work.

While the current draft includes Goal 6, a broad goal designed to ensure consideration of public health and environmental impacts across the study as a whole, and Goal 4, a similarly broad goal with respect to consideration of local economic and social effects, the Village urges inclusion of a separate objective to these effects within Goal 3, which is to "Improve Roadway and Transit Service Quality in I-290 Travel Corridor." Clearly, there is a high likelihood that attempts to advance Goal 3 will give rise to consideration of major capital investment strategies, such as the possibility of some form of lane re-configuration or expansion of I-290 along the section passing through Oak Park. Any such re-configuration or expansion of I-290 capacity will result in significant adverse impacts accruing to our community. As previously communicated, the Village is concerned that the objectives associated with Goal 3 may encourage goal attainment at all cost, particularly if a weighting scheme is applied to the goals, thus allowing one goal to achieve higher value than each of the others.

While both the Village and the Technical Committee have been advised in prior communications that all goals in the study will carry equal weight, thus negating the need to include additional objectives beneath Goal 3 in order to assure the appropriate and necessary levels of analysis, the Draft Evaluation Methodology explicitly states, "The screening of conceptual options will be conducted through an objective evaluation process *coupled with a goal weighting process* [emphasis added] utilizing the Technical Committee." It then follows with a description of the goal weighting procedures. Despite assurances that all of the goals will be treated as "equals", we can only conclude from the Draft

Evaluation Methodology that this is not the case, or that there has been a mistake in the Draft Evaluation Methodology.

As a result of the foregoing contradiction, the Village of Oak Park reiterates its request that a new objective be added to Goal 3 or, in the alternative, that the Draft Evaluation Methodology be amended to reflect that all goals shall carry equal weight. If a new objective is added to Goal 3, it should be stated as follows: "Avoid or mitigate adverse impacts on local community and enhance local economic development." As you know, the Village and its citizens remain deeply concerned as to the adverse impacts of I-290, whether in current or expanded form. The Village has prepared a comprehensive report on current and potential impacts, and is in the process of updating the report to reflect recent scientific and regulatory developments. The objectives supporting Goal 3 should clearly reflect the importance of a detailed and comprehensive analysis of these factors, as required by federal law.

In addition, Goal 6 should include a new objective to "Avoid/mitigate significant public health risks." This is essential for two reasons. First, the current language requiring compliance with applicable standards does not appear to provide for consideration of new scientific evidence indicating that current standards are not sufficiently protective. The federal Environmental Protection Agency (EPA) currently is in the process of revising two of the key health-based ambient standards with respect to transportation analyses: the standards for ozone and fine particulate matter. While adoption and implementation of the new standards make take years, the potential harm to Village citizens occurs daily and the impacts of new scientific evidence in these areas should be considered. The same is true with respect to pollutants for which there are no federal standards. For example, there currently are no federal standards for exposure to benzene, diesel emissions, and over 30 other "mobile source air toxics" (MSATs) that EPA has identified as hazardous air pollutants. Analyses of potential exposure to these and other potential toxicants will be required by federal law in the NEPA process, and the current study should reflect consideration of such impacts, as well, and begin to build a record for more detailed consideration at later stages of the process.

Statement of Purpose and Need

As the RTA has recognized, the Purpose and Need Statement is a critical document because it establishes the framework for all the work that follows. If the framework is flawed, the decisions about how to increase mobility in the Cook-DuPage Corridor will be flawed, as well. The prior RTA draft captured this idea very well: "A carefully crafted and publicly supported purpose and need statement is the fundamental start of a process leading to the successful implementation of selected transportation investments in the Cook-DuPage Corridor."

As discussed in our prior comments, the Village urges that the Statement of Purpose and Need should emphasize two guiding principles:

- Multi-modal solutions are preferable to single-mode solutions.
- Solutions that combine transportation and land use options are preferable to solutions that rely on transportation option solutions alone.

The current draft Statement, while mentioning these principles, still does not give them the clear preference that they deserve. The draft continues to identify the "four overarching mobility needs" of improving: (1) transit access to major employment centers, (2) the service quality of I-290, (3) the service quality of bus transit, and (4) improve the service quality of arterials, yet it continues to discuss

these essentially as separate studies, with no clear indication of how they would be integrated, along with other potential options, into an effective multi-modal solution for the corridor. The January 26, 2006 minutes from the joint meeting of the Policy and Technical Committees express the interest of the RTA in “engaging in a strategic planning effort to develop a transit driven multimodal strategy to enhance regional mobility.” The Village continues to urge that this should be stated clearly as a major purpose of the study, and the Statement should summarize RTA plans and procedures aimed at ensuring thorough consideration of integrated multimodal strategies.

In addition, the draft still does not give adequate consideration to land use options and related implications. Transit needs density to work properly, and the connection between transit and land use is critical. A 2005 Urban Land Institute publication titled “Higher Density Development: Myth and Fact” frames the issue this way:

It is estimated that a minimum density of seven dwelling units per acre is needed to make local bus service feasible with an intermediate level of service. Light rail needs a minimum density of nine dwelling units per acre to be feasible. When a community can take advantage of these options and increase the transportation choices for residents, relief is greater as total car dependency is further broken. Such choices are impossible for low-density developments.

In order to maintain the competitive edge for our region, our transportation investment strategies must be informed by a keen awareness of how our funding choices will act to shape future development, the provision of public services, and the costs associated with public infrastructure maintenance. Historically, public policy has not been effective in navigating these issues on multiple levels, including transportation planning. In 2002, The Brookings Institution published a report titled, “Valuing America’s First Cities.” In discussing the important roles that transportation investment plays in influencing land use patterns, they wrote:

Public investments in transportation form the skeleton of metropolitan areas and local communities. They dictate whether a metropolitan area remains compact or sprawls ever outward. Recent federal transportation legislation promised that transportation policy would begin to serve the needs of older communities . . . Mismatches between new jobs on the suburban fringe and affordable housing in first suburbs aggravates the problem and undermines those who rely on transit because they are either too poor, too old or too young to drive a private automobile . . . additional reforms must be taken to change large scale transportation and land use policies that tilt investment and growth away from existing core communities. Further, decisions on new highways, new interchanges and widening of existing roads should be preceded by and consistent with studies of their potential impact on existing communities.

The implications of inadequate consideration of the linkage between transportation planning and land use have manifested themselves in numerous tragic ways across the nation. The Urban Land Institute reports:

A recent study analyzing the costs of sprawl estimated that more than \$100 billion in infrastructure costs could be saved over 25 years by pursuing better planned and more compact forms of development . . . the Minneapolis/St. Paul region built 78 new schools in the suburbs between 1970 and 1990 while simultaneously closing

162 schools in good condition located within city limits. Albuquerque, New Mexico, faces a school budget crisis as a result of the need to build expensive new schools in outlying areas while enrollment in existing close-in schools declines . . . continuing the sprawling, low-density haphazard development pattern of the past 40 years is unsustainable, financially and otherwise. It will exacerbate many of the problems sprawl has already created—dwindling natural areas and working farms, increasingly longer commutes, debilitating traffic congestion, and harmful smog and water pollution.

The discussion in the Phase 1 Report about the imbalance between jobs and housing suggests that solutions that account for both transportation and land use will be more successful than transportation solutions alone. Abundant recent literature emphasizes the importance of deliberate and thorough analysis of the linkages between land use patterns and transportation funding decisions, and cautions the reader of the many negative and far reaching consequences that can and do accrue to individuals, communities, regions, and states when the appropriate level of foresight is not cultivated. It is imperative that the Statement of Purpose and Need provide an unambiguous reference to this critically important linkage between transportation planning and our region's social, environmental, and economic welfare, particularly from the perspective of anticipated changes in land use cultivated through our transportation funding decisions.

In addition, the focus of the Phase 1 Report is work trips, though there obviously are many other trip purposes, such as educational, medical, recreational, and cultural. The Village joins the Oak Park Visitors Bureau in advocating for greater recognition of the role that transportation planning plays not only in moving workers to and from their places of employment, but also in facilitating access to basic human needs, strengthening and maintaining local economies, and promoting greater social and cultural awareness through increased access provided to all persons, regardless of race, gender, age, ethnicity, sexual orientation, disability, religion, economic status, political affiliation or any of the other distinguishing characteristics that all too often divide people in society (Oak Park Diversity Statement, 2003).

Conceptual Options

The Village finds the current draft conceptual options to provide a useful framework for analysis of potentially feasible options for improvement. However, the Village is concerned that these are discussed essentially as separate options, with no clear indication of how they would be integrated, along with other potential options, into an effective multi-modal solution for the corridor. The RTA should make it clear that these options are for purposes of evaluation only and are not to be construed as the universe of options from which one will be chosen.

Importantly, the options developed during Phase 2 should include a role for the demand management alternatives, such as congestion pricing, van pools and car pools, flex-time, staggered work hours, and similar actions. The options also should include consideration of measures designed to enhance land use options and minimize adverse public health and environmental impacts, including the Oak Park Cap as discussed further below.

The Village notes that the specific project lists that were included in the prior draft of the conceptual options have been deleted from the versions released for public comment. The Village supports deletion of those lists, as they reflected an overemphasis on the I-290 HOV lanes, which appeared in every option except the option for no change to the existing system. The Village found this approach particularly

curious because 2030 Regional Transportation Plan (RTP) includes eight other recommendations for the corridor study and the I-290 project is listed only as a "corridor recommendation" and not a "project recommendation" (those were the Cermak and DuPage J BRT projects). In the view of the Village, the prior draft reflected a disturbing early bias toward the I-290 project that should not be allowed to pervade the subsequent portions of the study.

While the Village supports deletion of the prior project lists, the conceptual options and the Statement of Purpose and Need should state clearly that all of the options listed in 2030 RTP will be considered, in addition to any other options the study may identify. In particular, all potential transit options should be considered. The RTA should not disregard any of the RTP recommendations, though it is certainly free to consider additional measures not mentioned in the RTP. The language of the RTP makes this directive clear:

This corridor, whose principal axis runs due west of downtown Chicago and through central Cook and DuPage Counties, includes major highways (I-290 and I-88), three rapid transit lines (Green Line and two Blue Line branches) and three commuter rail lines (UP-West, BNSF and MD-W). All RTP strategies, combined with several major capital recommendations, should be considered in this study.

RTP system recommendations to include in study

- UP-West upgrade
- MD-West upgrade

RTP project recommendations to include in study

- Cermak Bus Rapid Transit
- DuPage "J" Bus Rapid Transit

RTP corridor recommendations to include in study

- I-88 add lanes
- Ogden Avenue Transitway
- Inner Circumferential Service
- Blue Line Extension
- I-290 High Occupancy Vehicle facility¹⁴⁶

¹⁴⁶ Including consideration of an expressway "cap" sensitive to the context of adjacent communities. For example, see "Citizen Committee Report on Capping the Eisenhower Expressway in Oak Park," Village of Oak Park, February 2003 (pp, 202-03).

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The HOV lanes will also complement existing and proposed transit service in the corridor. This project parallels the Blue Line Forest Park Branch, which is also proposed to be extended in the RTP and whose service may double as part of the "Circle Line" proposal. Several other transit services are also in the project corridor. The RTP recommends including each of these interrelated proposals in corridor project studies. Particular attention should be paid to providing safe walking and bicycling access across the I-290 corridor from adjoining neighborhoods and feeder bus services to existing and proposed transit services. These overlapping proposals are being evaluated in the Cook/DuPage multimodal corridor study. In addition, a study of "capping" a portion of the I-290 expressway in this area is being developed. A cap may reduce community impacts and could provide complementary transportation facilities. The project crosses the Des Plaines River and terminates near historic Columbus Park, where adjacent auxiliary lanes and interchange improvements are planned. The project is also near the Gunderson Historic District. (p. 168)

This language in the RTP makes it clear that the Oak Park Cap must be considered as part of the I-290 project. The Cap clearly provides transportation as well as public health and environmental benefits, as recognized in the RTP discussion of the I-290 project. Transportation elements in the preferred Cap concept developed by the Village include: (1) the Prairie Path connector; (2) improved transit center at Harlem; (3) improved transit center at Austin; (4) improved transit access at East; (5) improved transit station at Oak Park Ave; (6) improved transit access at Lombard. The report prepared by the Village consultants in support of the preferred concept estimates a resulting trip reduction of 500 trips per day, as well as improved bus, pedestrian and bicycle safety.

In addition, the Village is concerned that the Inner Circumferential Service, which would supply a much needed transit link between Midway and O'Hare Airports through west Cook County, does not appear to be contemplated in any of the conceptual options. In a random review of two jurisdictions' comprehensive plans (Broadview and La Grange Park) along the potential Inner Circumferential Rail Service, both have included plans for commuter/train stations along what is presently the Indiana Harbor Belt (freight) railway. Clearly, these established suburbs and others along the route are counting on this transportation investment to take place. Promoting transit-oriented development in these and other communities along the Indiana Harbor Belt will enhance access to affordable housing and jobs, enhance service to environmental justice communities, as well as encourage hotel development in west Cook County, a scarce and much needed resource according to the Oak Park Visitor's Bureau. The Village expresses support for this RTP corridor recommendation, particularly in combination with a westward extension of the blue line that would allow others east and west of the potential Inner Circumferential Service to access the facility. The Village expresses a distinct preference for options that incorporate strategies designed to reduce reliance on vehicles, enhance or protect public and environmental health, sustain or promote local economic vitality, and fully recognize and appreciate the implications of transportation funding on land use and development patterns.

Expansion of the Eisenhower is a strategy that the Village strongly opposes because it is significantly detrimental to our community, particularly if there is a failure to avoid or mitigate all adverse environmental and public health impacts that can reasonably be anticipated, and/or if any of the project work would result in a taking of adjacent properties, some of which are historic community assets, and

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all of which are important to our landlocked and built-out community of only 4.5 square miles in land area.

Public Participation

The Village continues to be concerned that the procedures employed to date in seeking input on the draft have not allowed opportunities for public input early and often, and do not appear to contemplate significant public comment until after many of the key initial decisions have been made. We are concerned with respect to public participation because the draft Statement of Purpose and Need and other supporting materials were available for review and comment, in prior iterations, long before the Citizen Advisory Committee was created. These key early activities occurred with little meaningful opportunity for citizen reactions or the beneficial dialogue that should occur between citizens and professionals. Citizens know their geographic areas. The professionals have the expertise to develop alternatives that work, how to analyze impacts, and the legal requirements that must be met prior to implementation.

The Village believes that a meaningful public input process is defined by two key attributes:

1. It provides a meaningful opportunity for citizens to comment, and for serious consideration and response to public comments.
2. It allows citizens and professionals to interact and learn from each other.

The RTA study is now making significant progress, but through a process that has yet to meet these essential requirements for public review and comment. We are pleased that RTA has now created the Citizens Advisory Committee and has released these draft documents for review and comment by all, including three public meetings to receive input. The Village urges RTA to continue to utilize these and all other reasonable procedures for input from both the advisory committee and the general public, to the maximum possible extent, including the distribution of meeting materials and public notices sufficiently in advance for committee members and the general public alike to be able to review - and not merely react to - what they are being asked to provide comment for. The distinction between opportunity to review and participate in the decision-making process verses the opportunity to simply react to materials supplied requires sharper focus moving forward.

Thank you for the opportunity to review and comment on the June 2006 draft documents. We see significant improvement in this draft and urge RTA to continue to improve and refine the process along the lines suggested above.

Respectfully submitted,

VILLAGE OF OAK PARK



Robert Cole

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