



December 4, 2003

Honorable Rod R. Blagojevich
Governor, State of Illinois
207 Statehouse
Springfield, Illinois 62706

Dear Governor Blagojevich:

I write to ask your assistance in ensuring that the upcoming studies of transportation options in the Central Cook-DuPage Corridor provide an "objective examination" of all viable alternatives to address congestion in this area and their potential impacts as you had indicated in your May 30, 2003 letter to Congressman Davis. Based on the Village's contacts with the Illinois Department of Transportation (IDOT) over the course of this year, we are concerned that your stated goal is threatened by the current IDOT plans. We understand that IDOT does not intend to consider all of the major transportation capacity enhancing options that might address mobility and congestion problems in the I-290 corridor as part of an integrated, balanced and comprehensive multimodal corridor study, as called for in the recently approved Regional Transportation Plan for the Chicago region.

As you know, the Village has been extremely concerned in recent years about the potential effects of the IDOT proposal to expand I-290, the Eisenhower Expressway, as it passes through Oak Park. Initially, it appeared that IDOT was rushing to judgment on the highway proposal without examining viable transit alternatives and the full panoply of potential impacts. In the past year, we believe that much progress has been made in this regard. IDOT has delayed the highway approval process, and the 2030 Regional Transportation Plan for the Chicago area adopted on October 9, 2003 calls for a single multimodal study of the Central Cook-DuPage Corridor listing a number of potential transit options to be studied along with highway and tollway proposals in the corridor. The RTP calls out the Cook-DuPage Corridor for a comprehensive study in order to "fully integrate the regional strategies, shared-use principles and major capital recommendations" with a "focused multi-modal analysis of all RTP strategic, system, project and corridor recommendations intended to serve them." The I-290 High Occupancy Vehicle (HOV) project is one of many corridor recommendations within this area "for which there is not yet a preferred alternative or multi-modal coordination scheme" for which "proposals often overlap" and "require further study to resolve." We are pleased that this year the Regional Transportation Authority (RTA) is beginning what has been described as a thorough "multimodal" study of all of those options in a manner that could fulfill the RTP's directive. We support this multimodal approach and will continue to participate extensively as the RTA study progresses.

However, the Village's contacts with IDOT at the state and district level suggest that the RTA study process is in danger of becoming fragmented, with the result that an objective and definitive analysis of all viable options may not be conducted. To date, IDOT has taken the

position that it will participate only in the first phase of the RTA study, which involves a market analysis of transportation needs in the corridor, but NOT any alternatives analysis. If we understand the Department's position correctly, upon the conclusion of the RTA market analysis, sometime next year IDOT intends to resume an independent analysis of a highway expansion project with the expressed intent to create HOV lanes from Mannheim Road to Austin Boulevard. Accordingly, this issue appears to be headed for a bifurcated approach under which IDOT studies the highway project separately from the RTA study, which will then seemingly be left to focus primarily on transit options.

We believe the RTA study should be the planning vehicle to determine what the best capacity improvements in the whole I-290 area. The RTA study more appropriately is taking into consideration a much broader corridor for study (from western DuPage County to Chicago). With parameters limited from Mannheim Road to Austin Boulevard, IDOT would be illogically terminating its analysis to a very small portion of the highway that has no independent utility when considering implementation of new HOV lanes. This limited approach continues the inappropriate segmentation of I-290 projects that started with what the IDOT director has publicly described as the "failed" Hillside Strangler project that only dealt with the I-290/I-88/I-294 interchange area without considering broader implications or other solutions to congestion. This is true especially when it is known and considered that the I-290 HOV lanes are contemplated (according to the 1998 IDOT HOV Lane Feasibility Study and current RTP) not just between Mannheim and Austin but extending west of Mannheim road to I-88. To fully realize this full HOV plan then would require another segmented study to go back and create the rest of the planned HOV lanes on that recently reconstructed segment of I-290 including construction of a major flyover bridge and reconfiguration of lanes.

We also believe that by pursuing a separate highway study with the expressed intent of creating HOV lanes only from Mannheim to Austin Boulevard, IDOT would restrict consideration of reasonable alternatives (or combination of alternatives) that may result from the RTA's broader corridor study. We believe that such an approach inevitably would produce competing studies with differing results, while providing no single definitive analysis that objectively compares all of the viable options and their potential impacts on an equal footing. Nor has IDOT demonstrated how it will fulfill federal requirements for integrating NEPA requirements with the objectives of a Major Investment Study (MIS), despite detailed suggestions from the Village of Oak Park on how that could be achieved as part of the RTA corridor study.

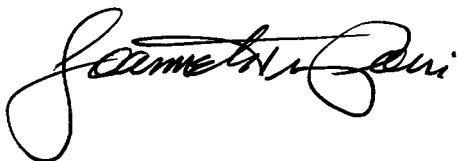
Finally, we continue to assert that the most appropriate level of environmental documentation for IDOT's proposed I-290 HOV project under NEPA is an Environmental Impact Statement, which provides for a rigorous analysis of a range of reasonable alternatives. As outlined in my January 8, 2003 letter to you, not only is there a strong legal basis for an EIS, but as the accompanying Oak Park citizen committee impact report detailed, it is clear that the deleterious social, community, health, historic and natural impacts of the highway expansion proposal would likely be significant and more than sufficient to warrant an EIS.

This situation is precisely the sort of redundant and inefficient process that recently prompted the General Assembly to create the Regional Transportation Task Force. It is also inconsistent with Senate Resolution 0173, approved unanimously this year, which endorses thorough consideration of all viable options through the RTA process and use of that process to comply with federal requirements for analysis of alternatives and impacts.

In your letter of May 30, 2003 to Congressman Danny Davis, which we greatly appreciated, you noted that IDOT had begun its Phase I analysis of the highway proposal, but subsequently had requested RTA to conduct an alternatives study. You stated that "the results of these studies will be combined to produce an objective examination of how best to address congestion on the Eisenhower Expressway within the subject limits." As a result of the recent developments described above, it now appears that this goal, which is vital to the interests of our community, will not be attained. We urge you to examine this issue in detail and to take such action as may be necessary to ensure that a single balanced and comprehensive multimodal corridor wide study of all viable capacity enhancing alternatives and their impacts is conducted in a manner that complies with the applicable federal requirements.

We believe that the best way to accomplish the stated goal is to require IDOT to participate fully with its I-290 HOV proposal in the pending RTA study in all its phases, and to use that study as the vehicle for compliance with the federal MIS and NEPA requirements. Through such an objective process, as called for by the RTP -- with extensive community involvement and taking a context sensitive approach -- lies the best hope for avoiding expensive and failed policy decisions and planning processes of the past and arriving at a sound public policy decisions on the best transportation option or options for this entire corridor.

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 loop at the end.

Joanne E. Trapani
Village President



Illinois Department of Transportation

Office of the Secretary
2300 South Dirksen Parkway / Springfield, Illinois / 62764
Telephone 217/782-5597

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VILLAGE CLERK
OAK PARK, ILLINOIS

September 4, 2003

Honorable Joanne E. Trapani
Village President
123 Madison Street
Oak Park, Illinois 60302-4272

Dear Village President Trapani:

Thank you for your recent letter regarding the proposed improvement of Interstate 290 (Eisenhower Expressway) in Oak Park. You are correct that the first phase of the Regional Transportation Authority (RTA) study is anticipated to be complete by spring 2004. Throughout the first phase of this analysis, the RTA will study stand-alone transit alternatives that have the potential to meet the purpose and need statement of the project. This phase will be integrated with the department's Phase I engineering.

The second phase of the RTA study will be a wider-ranging market analysis of transportation system needs in a sub-region of central Cook and DuPage counties. The department will continue preliminary analysis associated with the High Occupancy Vehicle lanes (HOV), Phase I engineering and public outreach. Be assured no work accomplished in this phase will negatively impact the results of the RTA's transit evaluation which will include an assessment of corridor transportation markets and deficiencies, and the ability of modal alternatives (highway and transit) to address these deficiencies. This study will also specifically address the potential of new transit services and/or enhancement of existing transit service to serve as an alternative to the proposed HOV lane on the Eisenhower Expressway (between Mannheim Road and Cicero Avenue).

As stated in our previous letter dated October 24, 2002 a stand-alone Major Investment Study (MIS) is no longer required by federal regulations. The Transportation Equity Act for the 21st Century (TEA-21) eliminated the need for a separate MIS. TEA-21 directed the Secretary of the US Department of Transportation to eliminate the separate MIS requirement and integrate the requirements into the National Environmental Policy Act and the metropolitan planning process. Although the federal regulations have not been updated to reflect this directive of TEA-21, this interpretation has been endorsed by the Federal Highway Administration.

The department will continue with the Environmental Analysis currently under way to determine the type of environmental document that will meet federal and state requirements. The department looks forward to continuing this dialog with the village and other communities along the corridor as both the department's Phase I engineering and the first phase of the RTA's study come to a close.

Sincerely,


Timothy W. Martin
Secretary