

**MEMORANDUM**

To: CMAP Board
From: CMAP staff
Date: September 9, 2013
Re: Summary of public comments received on proposed Illiana amendment

On Friday, August 2, 2013, the CMAP Transportation Committee released the CMAP [staff analysis](#) of the proposed Illiana Expressway plan amendment for a 32-day public comment period. During this time CMAP posted information about the public comment period on the agency website and in the Weekly Update email. The public comment period closed on Tuesday, September 3, 2013. This memo provides a summary of the public comments received to date. A complete PDF of every public comment made to CMAP can be downloaded [here](#).

In total, CMAP received 965 public comments on the proposed amendment. Comments were submitted by email, fax, mail, and phone. The majority of comments came from Illinois residents, businesses, organizations, and governments, however, CMAP also received public comments from Indiana units of government and residents. Of the 965 comments, 169 were supportive of the proposed amendment, and 796 comments expressed opposition to it. These numbers do not include two petitions that were also submitted as public comment in opposition to the proposed amendment. The [first petition](#) was received from the State Taxpayers Opposing the Proposed Illiana Toll Road (STOPIT Committee), which included 898 signatures from both Illinois and Indiana residents opposed to the Illiana. The [second petition](#) was submitted by No Illiana 4 US and includes over 2,900 signatures against the Illiana.

The remainder of this memo describes the nearly 1,000 public comments received by CMAP. To highlight common themes, the comments are divided into the two general categories of support and opposition. The comments are further subdivided into the following categories:

- Businesses, which includes individual businesses and chambers of commerce.
- Civic organizations, which includes membership-based organizations, educational institutions, and not-for-profits.
- Government, which includes municipal, county, councils of governments, councils of mayors, state, and federal.
- Individuals or residents.
- Labor unions.

Business, civic, government, and labor union comments are summarized below to highlight key issues, whereas the individual comments are described more generally. Each category of comments is available in PDF format by clicking the linked headings for each section.

Support

Comments in support of the Illiana project cited multiple benefits, chief among them transportation improvements and economic development. Respondents stated that the new expressway would reduce congestion on existing routes, particularly I-80 and local roads in Will County, and accommodate future traffic growth in the corridor. Some respondents also noted that the Illiana would provide east-west connectivity that is currently lacking in the corridor. In terms of economic development, respondents stated that the project would create near-term construction jobs and also long-term benefits, namely by providing better market access and supporting the growth of intermodal and logistics activity in the area.

Respondents also noted a variety of other benefits. Some stated that the potential for a public-private partnership would be beneficial, leveraging additional private investments for the facility. Less-frequently cited benefits included safety improvements, increased tax revenue, and environmental benefits. Environmental benefits included reduced emissions (as a result of less congestion), as well as minimal disruption to existing communities.

Business

Aldridge Electric, Inc.

Aldridge Electric states the Illiana will provide a "much needed east-west alternative" and will result in decreased travel time, enhanced safety, and increased reliability. They also believe the Illiana will provide economic development opportunities in the Southland.

Chicago Southland Chamber of Commerce

As an advocate for important infrastructure, the Chicago Southland Chamber states that the Illiana should be included in the GO TO 2040 plan. If not, the chamber says, a \$40 million investment in the planning for the project will be lost, and the process for soliciting potential concessionaire teams for a public-private partnership (PPP, also referred to as P3) will be halted.

Economic Alliance of Kankakee County

The Economic Alliance of Kankakee County submitted resolutions passed in support of the Illiana Expressway. Resolutions were from 2010 and state that I-80 and I-94 are experiencing growing congestion, and Kankakee County has a concentration of intermodal centers that are creating congestion and threatening quality of life and safety of local citizens. The resolutions also state that freight movement is critical to the national, regional, and local economy, resolving that there is local support for a new circumferential east-west expressway – the Illiana Expressway.

Fidelity National Title of Illinois

"As a business manager that employs 25 in the Will/Grundy area I support the B3 Corridor plan."

Gallagher Asphalt

Gallagher Asphalt states that the Illiana is long overdue, and major capital projects require a "leap of faith" at their outset. As local resident, knows need for relief on I-80. As business owner, knows economic benefit.

Great Lakes Basin, LLC

"I plan to be part of the P3 bid and will offer a second concession check (after tolls) that, in my estimation, can fund the entire corridor, without any public monies needed to build and operate both a toll highway component and a freight rail component."

Grundy County Economic Development

Grundy County Economic Development states that industrial and residential growth in the area has created a need for the Illiana.

Illinois Association of Aggregate Producers (IAAP)

The IAAP believes the Illiana will produce economic and environmental benefits, and that the PPP structure will reduce costs.

Illinois Road and Transportation Builders Association (IRTBA)

IRTBA states that the Illiana is of national, regional, and local significance. "CMAP has downplayed the economic benefits this project would provide...CMAP should apply a consistent standard of evaluation with respect to financing construction and operating costs. CMAP has also not recognized the positive impact on truck freight traffic...that the Illiana would create."

J.S. Alberico Construction Co., Inc.

J.S. Alberico is a local construction firm that sees growth in traffic on I-80 as detrimental to business, and states that the "vast majority" of vehicles on I-80 are passing through.

Joliet Region Chamber of Commerce and Industry

The Board of Directors of the Joliet Region Chamber of Commerce and Industry supports the Illiana and are requesting its inclusion in GO TO 2040 because of safety concerns for citizens and drivers, for improved congestion, reduced travel times, and to support the local economy.

Lake Tandem Lodge

Lake Tandem Lodge states that the Chicago region is in dire need of the Illiana. It will help alleviate pressure on local roads and support intermodal development in the Southland region.

Lane Construction Company

Lane Construction Company states that the project can be built using PPP. Near-term benefits include job creation and healthier infrastructure.

Managing Packaging Systems

Managing Packaging Systems states that the Illiana will reduce traffic on I-80, support Peotone Airport, and "revitalize business parks all over the south suburbs."

James McHugh Construction Co. (McHugh)

McHugh supports the Illiana because it will provide improved access, supports population growth and employment, improve safety, supports the use of PPPs, and has a number of environmental benefits.

Jones Lang LaSalle Americas

As a former resident of Will County, Mr. Ostrowski supports the Illiana because Jones Lang LaSalle is marketing the connections the expressway will have to logistics companies. It is critical to the growth of the RidgePort Logistics Center in Wilmington, IL. The expressway will ease congestion and provide for efficient movement of goods.

Moore Glass, Inc.

Moore Glass supports the Illiana because the expressway is needed to reduce truck congestion on local roads, thereby improving traffic and safety and increasing jobs and tax revenue.

Ozinga Bros., Inc.

Ozinga Bros., states that the Illiana corridor is a necessary step toward creating short-term and long-term jobs in both Indiana and Illinois. By connecting two major roadways, the Illiana can relieve traffic congestion on local roads. Vehicle idling is a major issue, Ozinga says, and emissions caused by trucks stopped on the road could be prevented with the Illiana.

Prairie Material

Prairie Material supports the Illiana because it will provide a bypass for cars and trucks around Chicago, stimulate the economy by creating jobs, and become the first public-private partnership in Illinois.

Presence Saint Joseph Medical Center

Presence states that the Illiana will provide a much needed bypass for trucks on congested local roads. They also are supportive of the economic benefits of the Illiana and applaud the efforts of the Illiana to be more sustainable by reducing number of hours traveled, emissions, and wasted fuel due to traffic congestion.

The Scoular Company

The Scoular Company has two grain-handling operations in Will County (in Andres and Joliet), both of which are highly dependent on trucks to move containers. The Illiana would reduce regional traffic congestion and provide a high-speed freight corridor between Indiana and Illinois.

Valley Fire Protection Systems

Valley Fire Protection Systems supports the Illiana because it will create jobs for both Indiana and Illinois and provide a much needed diversion for today's congestion. It will also improve safety in the region.

Will County Center for Economic Development (CED)

The Will County CED supports the Illiana and recognizes that there are areas of disagreement between the Illinois Department of Transportation (IDOT) and CMAP that need to be resolved. However, it asserts that there are similarities between the IDOT and CMAP analyses, including impact on urbanization, support for freight, and PPPs. The CED also raises a concern that CMAP's review process for adding major capital projects has changed.

Other Businesses

Five additional businesses -- Diversified CPC International, Inc., Lafarge United States, Ledcor Construction, McColly Bennett Commercial, and Strand Associates, Inc. -- submitted largely similar letters expressing support for the Illiana because of its transportation, economic, environmental, and safety benefits.

Civic

Chicago Southland Convention and Visitors Bureau

The Chicago Southland Convention and Visitors Bureau supports the Illiana Expressway because it will ease increasing traffic and improve quality of life for local commuters. The Illiana will also provide opportunities for economic development in the hospitality sector, providing jobs and tax revenue for Will County and the Chicago Southland.

Illinois Economic Policy Institute (IEPI)

The IEPI states that the Illiana will produce economic and environmental benefits, will not divert funds from other major capital projects, will generate substantial tax revenues, and will accommodate the South Suburban Airport. IEPI believes the benefits outweigh the upfront costs. IEPI also included a detailed policy briefing book.

Lewis University

Lewis University supports the Illiana Expressway because it will provide for reduced congestion, safe efficient movement of freight and people, economic development, and environmental benefits including reduced emissions.

University of St. Francis

The University of St. Francis supports the Illiana and states it will reduce congestion, is designed for environmental and quality-of-life considerations, and provides an important link in the transportation network. The University does not see the Illiana as inconsistent with transportation projects in the core of the region.

Government – Municipalities in South Cook County

Homewood

The Village of Homewood supports the Illiana as an alternative route to I-80, reducing congestion and maintaining an efficient freight network. The Illiana is also an opportunity to support innovative financing.

Richton Park

The Village of Richton Park sent a letter in support of the Illiana to improve regional mobility, support economic development, and enable innovative financing. The Village states that the Illiana will not promote sprawl.

South Chicago Heights

The Village of South Chicago Heights sent a letter supporting the Illiana, stating it will provide "significant congestion relief, support the economy in the south suburbs and improve quality of life in eastern Will County." The Village also supports the use of innovative financing for the Illiana.

Government – Municipalities in Kankakee County

A number of Kankakee municipalities submitted resolutions passed in support of the Illiana Expressway. Resolutions were from 2010 and state that I-80 and I-94 are experiencing growing congestion, Kankakee County has a concentration of intermodal centers that are creating congestion, threatening quality of life, and safety of local citizens. The resolutions also state that freight movement is critical to the national, regional, and local economy, resolving that there is local support for a new circumferential east-west expressway – the Illiana Expressway.

1. Aroma Park (February 9, 2010)
2. Bourbonnais (February 17, 2010)
3. Bradley (February 8, 2010)
4. Chebanse (undated)
5. Grant Park (February 16, 2010)
6. St. Anne (March 8, 2010)
7. Manteno (February 16, 2010)
8. Momence (March 1, 2010)

Hopkins Park

The Village of Hopkins Park sent a letter that states their support for the Illiana Expressway and for the opportunity it can offer its residents.

Government – Municipalities in Will County

Beecher

The Village of Beecher is supportive of the Illiana Expressway and has passed a number of resolutions in support of the project; most recently the Village Board passed a resolution on August 13, 2012. In their cover letter, the Village expressed that a number of local communities, including Beecher, have been actively participating in discussions on the Illiana for some time. The Village states that the Illiana must be looked at from a Midwest or National perspective to achieve freight efficiencies. Beecher is also supportive of this project because of the economic development it may bring and states the PPP concept will ultimately determine if it is cost-effective to build this roadway.

Braidwood

The Braidwood City Council passed a resolution in support of including the Illiana on August 27, 2013. The resolution states that there has been a significant increase in heavy truck traffic damaging local roads. The Illiana is necessary to handle existing and future east-west truck traffic.

Channahon

The Village of Channahon sent a letter in support of the Illiana, stating it will reduce congestion, remove trucks from local roads, support intermodal development, promote broader economic development, and support innovative finance.

Crest Hill

The Village of Crest Hill sent a letter in support of the Illiana, stating it will reduce congestion, remove trucks from local roads, support intermodal development, promote broader economic development, and support innovative finance.

Diamond

The Village of Diamond passed a resolution in support of the Illiana on August 13, 2013. The resolution states that the Illiana will support economic development, support innovative financing, reduce congestion, improve safety, and remove trucks from local roads.

Frankfort

The Village of Frankfort supports the Illiana because it would improve regional mobility, increase the efficiency of freight movement, and use innovative financing. Frankfort also states that the project has momentum due to the current significant support of elected officials in Illinois and Indiana.

Joliet

The City of Joliet states that the Illiana is needed to support the major intermodal facilities in Joliet and to support Will County as a grain exporter. The City's letter also notes that I-80 and its interchanges in Joliet are presently insufficient to meet demand.

Manhattan

The Village of Manhattan supports the Illiana to reduce local truck traffic, serve intermodal developments, provide network connectivity, and improve mobility.

Orland Park

The Village of Orland Park sent a letter in support of the Illiana, stating that it will reduce congestion, remove trucks from local roads, support intermodal development, promote broader economic development, and support innovative finance.

Peotone

The Village of Peotone sent a letter in support of the Illiana, stating it will reduce congestion, remove trucks from local roads, support intermodal development, promote broader economic development, and support innovative finance.

Plainfield

The Village of Plainfield sent a letter in support of the Illiana, stating it will reduce congestion, remove trucks from local roads, support intermodal development, promote broader economic development, and support innovative finance.

Tinley Park

The Village of Tinley Park sent a letter in support of the Illiana, noting the following advantages: cost-effective PPP, environmental improvements by reducing congestion, expanded access to markets and intermodals, and industrial development opportunities.

Wilmington

The City of Wilmington sent a letter in support of the Illiana, citing economic benefits, GO TO 2040's support of PPPs and freight investment, and the CMAP nexus report's support of freight. The Village of Wilmington sent seven copies of the letter signed by various city officials, including the Mayor, five Aldermen, and the City Clerk.

Government – County and Councils

Grundy County

Grundy County sent a letter in support of the Illiana, stating it will reduce congestion, remove trucks from local roads, support intermodal development, promote broader economic development, and support innovative finance.

Kankakee County

The Kankakee County Board passed a resolution in support of the Illiana B3 alternative on March 13, 2012. The Board also sent a letter citing the need for safe efficient transportation, efficient movement of freight and people, minimal environmental impacts, the greatest financial viability, and the most compatible with community plans. This resolution is supported by all of the county's subcommittees.

South Suburban Mayors and Managers Association (SSMMA)

On behalf of its communities, SSMMA strongly supports the proposed amendment. SSMMA states that the Illiana has the potential to provide significant congestion relief and will support the economy of the south suburbs and improve quality of life in eastern Will County. An efficient freight network is critical to the economic well-being and livability of the Chicago region. South Cook and eastern Will counties are the most underdeveloped portions of the region and have long commute times.

Will County

Will County sent a letter expressing strong support for the Illiana. The county is a fast-growing population and freight center. The facility will improve regional mobility, support freight and mitigate the negative impacts of heavy truck traffic, and provide economic benefits. IDOT has managed an extensive outreach process, made considerable progress toward completing the EIS, and has met the requirements outlined by CMAP for GO TO 2040 amendments.

Will County Government League (WCGL)

The WCGL sent a letter in support of the inclusion of the Illiana now and not during the next long-range plan cycle. The Illiana accomplishes stated regional goals to reduce congestion, improve safety, reduce emissions and make deliveries to local suppliers more efficient. Given the region's limited capital resources, adding unnecessary expense to the Illiana through delays limits the region's ability to implement the goals of GO TO 2040.

Government – State and Federal

Illinois Department of Transportation (IDOT)

IDOT sent a response to CMAP staff analysis regarding the proposed Illiana Expressway's planning process, forecast assumptions, costs and financing, and local planning. A PDF of IDOT's analysis can be viewed [here](#).

Joliet Arsenal Development Authority (JADA)

JADA supports the development of the Illiana Expressway using the B3 central corridor alignment as that alternative will have the highest positive economic impact for the region. JADA states that the JADA/CenterPoint developments will continue to expand and improve economic development with jobs and investments related to the Illiana.

State Representative Anthony DeLuca

Representative DeLuca supports the Illiana Expressway because the existing expressway system is reaching capacity, and if we cannot solve our congestion problems, freight companies will start moving away. This would be a detriment to our economy.

U.S. Representative Robin L. Kelly

Representative Kelly strongly supports the Illiana because it will relieve road congestion, reduce drive times, and reduce air and noise pollution. The Illiana is also about transportation equity, regional fairness and quality of life. The project will contribute to the future success of the Southland.

Individuals

In total, CMAP received 80 comments from individuals in support of the Illiana Expressway. Generally speaking, comments reflected similar benefits noted across the business, civic, education, government, and labor organizations. A number of the comments listed an identical list of benefits. Comments in support came from residents in the following municipalities: Aurora, Bolingbrook, Channahon, Chicago, Frankfort, Glenwood, Homewood, Joliet, Lemont, Lowell (IN), Markham, McHenry, Morris, Oak Brook, Orland Park, Romeoville, Schaumburg, South Holland, Thornton, Tinley Park, Warrenville, Wilmington, and Yorkville. However, it should be noted that, while CMAP documented where comments came from, not everyone included their place of residence in their submission.

Labor Unions

AFL-CIO

The AFL-CIO states that the Illiana is a much-needed project that will help relieve traffic in northeastern Illinois by providing an east-west link between Illinois and Indiana. The Illiana will also provide a much needed boost to the economy by creating construction and long-term jobs for the region.

Chicago Area Laborers-Employers Cooperation and Education Trust (LECET)

The Chicago Area LECET supports the Illiana, which will produce substantial economic benefits and jobs, increase tax revenues, and use the PPP model to allow projects like the Illiana to be built with fewer tax dollars.

Construction and General Laborers' District Council of Chicago and Vicinity

The Construction and General Laborers' District Council states that the Illiana should be included because of job creation, economic opportunity, safety, efficiency, environmental benefits, and fiscal constraint.

Indiana-Illinois-Iowa Foundation for Fair Contracting (III FFC)

The III FFC strongly supports the Illiana for a number of reasons. The III FFC states that the Illiana will produce substantial economic benefits and jobs, increase tax revenues, and use the PPP model to allow projects like the Illiana to be built with fewer tax dollars.

Labor-Management Cooperation Committee (LMCC)

The LMCC supports the proposed amendment because it will provide a way for cars and trucks to navigate around Chicago, stimulate the economy, and be the first PPP in Illinois. The Illiana will allow the state to construct a great project with fewer tax dollars, allowing taxpayers to foot less of the bill. In addition to economic benefits, LMCC is also supportive of this project for safety, efficiency, and environmental reasons.

Other Union Support

Fourteen additional Unions sent letters of support for the Illiana. Their letters of support state the importance of the project's economic benefits and the need to create construction jobs in the region. Additionally, the Illiana will reduce congestion, provide access to intermodal centers, and support innovative finance in Illinois.

Each of the following unions sent an identical letter of support:

1. Carpenters Union Local 1185
2. International Association of Bridge, Structural, Ornamental and Reinforcing Iron Workers Local Union 444
3. International Association of Sheet Metal, Air, Rail, and Transportation Workers Local Union No. 265
4. International Brotherhood of Electrical Workers (IBEW) Local No. 176
5. International Union of Bricklayers and Allied Craftworkers

6. International Union of Operating Engineers - Local 150
7. Kankakee Building and Construction Trades Council
8. Laborers' Local 75
9. Sprinkler Fitters and Apprentices Union Local 281
10. Teamsters Local Union No. 179
11. United Brotherhood of Carpenters and Joiners of America Local Union No. 174
12. United Union of Roofers, Waterproofers, and Allied Workers Local No. 11
13. Will & Grundy County Building Trades Council
14. Pipefitters' Association Local Union 597

Opposition

Opponents of the Illiana project were primarily concerned with the project's financial feasibility, projected economic benefits, inconsistency with GO TO 2040 principles, and environmental harm. In regard to the project's financial feasibility and economic benefits, many of those opposed state that IDOT has not demonstrated how toll revenues would cover the costs of the facility and suggest that instead, the burden of these costs would fall on taxpayers. Many opponents also challenged the nature of the data used to support the project, expressing concern that the projected economic benefits are inflated, especially relative to potential long-term negative regional impacts.

In terms of environmental harm, opponents asserted that this project would destroy native wildlife habitats, including the Midewin National Tallgrass Prairie, fertile farmland, rural communities and residents' way of life in the path of the chosen B3 alternative. Many opponents also discussed how the proposed Illiana alignment would affect Midewin National Tallgrass Prairie. Additionally, opponents noted how the Illiana would be further detrimental to people's access and use of the Abraham Lincoln National Cemetery. Still other opponents expressed that – while they acknowledge the need for transportation facilities to better accommodate freight truck traffic and alleviate congestion and safety issues – the Illiana is not the best solution, and the region should instead invest in its existing transportation network and emphasize rail-based freight as a better alternative.

Business

FitzGerald Associates Architects

FitzGerald Associates Architects does not support the Illiana. Stating that the project is driven by an “entrenched road-building lobby,” FitzGerald asserts that it would be a misuse of public funds.

U.S. WAY Corp.

They are a private electronics-design company that works in energy-efficient products and proposes a MagLev Train as a high-speed rail solution to the freight needs that are addressed by the Illiana.

Civic

Active Transportation Alliance (ATA)

The ATA is opposed to the Illiana primarily because there is an unacceptably high risk that, if constructed, the Illiana will require significant public funds to supplement its private financing. ATA expressed concern that the project was inconsistent with GO TO 2040 and also cited environmental concerns.

Calumet Ecological Park Association

The Calumet Ecological Park Association opposes the Illiana due to its cost and potential to diminish the habitat along the border of the Midewin National Tallgrass Prairie and the Des Plaines Conservation Area.

Center for Neighborhood Technology (CNT)

CNT opposes the Illiana for numerous reasons that fit in three broad categories. The first is that the justification for the Illiana relies on outdated assumptions about development patterns and will do little to increase regional prosperity. The second is that the Illiana is not a cost-effective investment given other transportation needs. The third is that the ancillary impacts of the Illiana have not been fully considered.

Chicago Streetcar Renaissance

The Chicago Streetcar Renaissance is opposed to the Illiana because of the cost to build, operate, and maintain the Illiana. The Renaissance recommends that the city and state invest in alternatives to driving, particularly the streetcar.

Chicago Wilderness

Chicago Wilderness is opposed to the Illiana due to concerns about the project's potential negative impact on the region's natural assets and the areas designated as part of the GIV. The group also notes that the Illiana does not support GO TO 2040.

Congress for the New Urbanism (CNU)

CNU is opposed because Illinois is in financial crisis and funding for project has not been fully identified. The Congress encourages "smaller scale network-based highway solutions to address the population forecast and freight needs."

Congress for the New Urbanism (CNU) Illinois, Board of Directors

On behalf of CNU Illinois membership, CNU Illinois strongly opposes this amendment. CNU Illinois opposes the project because it goes against the principles of GO TO 2040 and because it has the potential to take away funding from other regional priority projects like the CTA Red Line extension.

Dunelands Group of the Hoosier Chapter of the Sierra Club

The Dunelands Group opposes the Illiana because the project will degrade habitat, pollute the Kankakee River, and put pressure on clean water resources. Additionally, the group opposes the facility because it conflicts with GO TO 2040.

Friends of the Kankakee

The Friends of the Kankakee's Board is comprised of equal number of members from Illinois and from Indiana. The group voted against Illiana at their August 2013 meeting.

Illinois Ornithological Society

The Illinois Ornithological Society is opposed due to the low cost estimate and inconsistency with GO TO 2040. The society also cites negative impacts on Midewin, a globally important grassland habitat. Finally, they are concerned about continued sprawl.

Illinois PIRG Education Fund

Illinois PIRG Education Fund opposes the Illiana because the road is unnecessary, will deplete scarce dollars away from other road projects, and will contribute to sprawling development rather than investment in existing communities. The project doesn't make financial sense and leaves Illinois taxpayers at risk. In addition, given the magnitude of the changing trends and the implications for the future, the Illiana Tollway doesn't make sense for the region's residents.

Metropolitan Planning Council (MPC)

MPC states that "the Illiana would yield few benefits in exchange for high – and uncertain – costs." Among MPC's concerns: It is not evident that private funds will cover all capital and long-term maintenance costs, future toll revenues are uncertain, and cost estimates are low. MPC questions IDOT's cost projections and cites recently built similar toll roads that did not achieve expected revenues, including several bankruptcies. The Council states that the Illiana's high cost requires harmful tradeoffs that would impede other GO TO 2040 major capital projects. The Illiana fails to address the region's transportation needs, MPC says, carrying fewer vehicles per day than many arterial roads and doing little to reduce congestion. The Council states: "The Illiana would do little to improve the region's economic health and would not help the region grow sustainably."

Midewin Heritage Association

The Midewin Heritage Association states that the Illiana does not advance GO TO 2040 goals and will not improve quality of life. The project will have detrimental impacts on historic sites, communities, agricultural lands, and natural areas. The facility was analyzed as a freeway, but will now be a toll road well south of the region that does not improve regional mobility. Finally, the project's approaches to potential environmental and traffic impacts appear to be mitigation rather than resolution.

Midewin National Tallgrass Prairie

The Midewin National Tallgrass Prairie opposes the Illiana primarily because of the environmental concerns. Acknowledges that transportation facilities are needed to address the core purpose of the Illiana proposal, but states the B3 corridor is not the solution. Additionally, Midewin National Tallgrass Prairie questions the lack of coordination across major capital projects in that area.

Midewin Tallgrass Prairie Alliance

The Midewin Tallgrass Prairie Alliance opposes the Illiana, stating that the expressway will make congestion worse, severely impacting the the Midewin National Tallgrass Prairie,

Abraham Lincoln National Cemetery, Historic Route 66, and local communities. The Alliance is also concerned with the local communities' capacity for land use planning, the lack of identified funding for the expansion of I-55 and I-80, and the costs of the road. They look forward to finding a regional solution to managing truck traffic that is not the B3 alternative for Illiana.

No Illiana 4 US

A grassroots bi-state group, No Illiana 4 US, strongly opposes the Illiana. They question the projected costs to build the Illiana, removal of productive agricultural land, destruction of local heritage, under-reporting by IDOT/INDOT of impacted homeowners, and environmental issues. Included in the No Illiana 4 US public comments are approximately 2,900 notarized petition signatures of local Indiana and Illinois residents who oppose the Illiana Expressway.

Openlands Joint Coalition Letter

A coalition of 19 organizations signed a joint letter opposing the Illiana. They state that the Illiana is inconsistent with GO TO 2040, would be "financially imprudent, offers minimal transportation value and disproportionately low economic benefits, and would unnecessarily damage vital natural resources." For those reasons and more, the following organizations signed on to oppose the Illiana:

1. Audubon Society, Chicago Region
2. Bird Conservation Network
3. Center for Neighborhood Technology
4. Chicago Audubon Society
5. Citizens Against Ruining the Environment
6. Environmental Law and Policy Center
7. Fuller Park Community Development
8. Illinois Audubon Society
9. Illinois Division of the Izaak Walton League of America
10. Illinois Paddling Council
11. Indiana Chapter of Izaak Walton League of America
12. Midewin Heritage Association
13. Midewin Tallgrass Prairie Alliance
14. Openlands
15. Prairie Parklands Ecosystem Partnership
16. Prairie Rivers Network
17. Sierra Club, Illinois Chapter
18. The Nature Conservancy
19. The Wetlands Initiative

Shut This Airport Nightmare Down (STAND)

STAND is opposed, citing its mistrust of IDOT in light of prior projects in that area of the region. In addition to questioning the project's economic benefits, STAND states that the Illiana would support sprawl, destroy farmland, disrupt the environment, and displace families.

State Taxpayers Opposing the Proposed Illiana Toll Road (STOPIT) Committee

The STOPIT Committee strongly opposes the Illiana and supports a “No Build” future for Indiana. The STOPIT Committee believes that a “bypass does NOT promote economic growth.” Included in this public comment is a petition signed by 518 Indiana residents and 380 Illinois residents.

The Nature Conservancy in Illinois

The Nature Conservancy in Illinois is opposed to the Illiana because of cost, inconsistency with sound land use and transportation planning, and concern for wildlife habitats.

The Wetlands Initiative

The Wetlands Initiative is opposed to the Illiana, stating that the cost estimates are unrealistic, the PPP is vague, and is based on unsupportable growth forecasts. The Wetlands Initiative is also opposed because of the environmental harm that would come to the Midewin National Tallgrass Prairie and the Des Plaines Conservation Area.

Township Wildlife Society

The Township Wildlife Society opposes the Illiana and states that CMAP has not taken into consideration the proper procedures or MAP-21 requirements.

Government

Cook County

Cook County opposes the Illiana due to concerns about the low projected cost of the facility as compared to other projects as well as the additional subsidy required to add 33 lane miles to nearby expressways. The County also extended concerns about the Illiana’s consistency with the GO TO 2040 plan and whether it promotes optimal and sustainable growth, citing the discrepancy between IDOT and CMAP forecasts. The County expressed significant concerns with the economic projections, which indicate that the region as a whole, and particularly Cook County, will lose jobs. Finally, Cook County noted that it is a locus of the region's freight rail and trucking facilities, and that Illiana may drain freight facilities out of Cook County. It also notes that the Illiana will address only a small part of the region's freight congestion.

Dundee Township Supervisor (Kane County)

The Dundee Township Supervisor is opposed to the Illiana because of the potential environmental impacts the expressway will have. Recommends building more transit on existing tollways.

Judy Ogalla, Will County Board Member, District 1

Writing on behalf of her constituents in Washington, Will, and Peotone Townships, the Will County District 1 elected Board member opposes the Illiana. She is opposed for a number of reasons: Local townships will experience a future loss of tax dollars as IDOT buys property and takes it off the tax rolls; quality of life "will be changed forever" for local residents; and other negative impacts include future flooding issues and disrupted police and fire services because of road closures.

McHenry County

McHenry County questions the prioritization and fast-tracking of the Illiana project by IDOT and supports the process used for developing GO TO 2040. They state that many other projects that are in the TIP should be prioritized before moving forward with the Illiana, especially in light of the lack of information to demonstrate the benefits of the project. As long as the state continues to arbitrarily limit highway funding in the Chicago region based on a formula that caps funding at 45 percent of the state total, additional funding for this project will mean less funding for projects that have been in the TIP for many years.

Village of Elwood (Will County)

The Village of Elwood strongly opposes the Illiana, stating that the negative impacts on Elwood have not been considered thoroughly. The Village questions IDOT's project study process (including use of consultants, software, stakeholder engagement, and data) and expresses major concerns with safety.

West Creek Township (Lake County, IN)

West Creek Township opposes the Illiana because IDOT has presented "false and inflated numbers to create a P3 that the taxpayers of the states of Illinois and Indiana will be responsible for." They are also concerned for vital agriculture industry and wildlife habitats, and suggest that expanding rail capabilities makes more sense.

Individuals

Sierra Club Illinois Chapter members

A majority of opposition letters, 627 total, came from members of the Sierra Club of Illinois. These letters stated opposition to the proposed amendment based on concerns of financial feasibility, environmental harm, loss of agriculture, conflicts with the Abraham Lincoln National Cemetery, and inconsistency with GO TO 2040.

Other individual comments

The remaining 126 comments from individuals who oppose the Illiana Expressway generally reflected similar concerns as the business, civic, and government letters. However, a number of letters from local residents showed concern for the loss of their way of life if the Illiana were to be built. Comments came from residents in the following municipalities: Arlington Heights, Aurora, Berwyn, Chicago, Deerfield, Frankfort, Gary (IN), Glen Ellyn, Glenview, Grant Park, Hickory Hills, Hinsdale, Joliet, Lake Bluff, LaPorte (IN), Lockport, Lowell (IN), Manhattan, Naperville, Oak Park, Park Ridge, Peotone, Plainfield, Riverside, Sandwich, St. Charles, Tinley Park, Union Mills (IN) Valparaiso (IN), West Creek Township (IN), Western Springs, Wilmington, and Winfield. Again, not everyone included their place of residence.

ACTION REQUESTED: Informational

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