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Illinois Department of Transportation

Office of the Secretary
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August 20, 2013

The Honorable Gerald R. Bennett
Mayor
City of Palos Hills
10335 South Roberts Road
Palos Hills, IL 60465

Dear Mayor Bennett:

As a follow up to the ongoing discussions about the Illiana Corridor project, we would like to take this opportunity to highlight some key issues that have not been fully addressed by the Chicago Metropolitan Agency for Planning's (CMAP) staff as part of their July 30, 2013 evaluation, or in their subsequent presentations to various CMAP committees. These key issues are summarized below, and for further details, please refer to our attached review of CMAP's July 30, 2013 evaluation.

General

The planning work (i.e., Environmental Impact Statement (EIS)) for the Illiana Corridor project was included in the fiscally constrained portion of the GOTO 2040 Plan (Plan), and set the stage for initiating studies in Spring 2011. The Illiana planning process has been a great success thus far, with completion of the first portion of the EIS process (Tier One) through a partnership with stakeholders across a bi-state 900 square mile study area, as well as partnerships between two state Department's of Transportation, two Federal Highway Administration (FHWA) division offices, and all of the bi-state region's environmental regulatory agencies. This represents an unprecedented level of stakeholder participation, technical expertise, and agency oversight, with literally hundreds of stakeholder and agency meetings that supported the Tier One findings and approvals.

CMAP staff has participated in the process from the very beginning, with extensive data sharing, one on one meetings, and as a member of the Illiana Corridor Planning Group. However, CMAP's July 30, 2013 staff evaluation only briefly acknowledges Tier One and the ongoing Tier Two efforts, and instead, CMAP has created a new process for evaluating the Illiana Corridor project that marginalizes the EIS process. The level of information being furnished by the Illinois Department of Transportation (IDOT) in support of this Plan amendment request is well beyond the level of technical detail and stakeholder outreach for any project considered in the development of the Plan.

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IDOT cannot obtain FHWA approval of the final portion of the EIS process (Tier Two), which is targeted for early 2014, if the project is not included in the fiscally constrained portion of the Plan. **If the Illiana Corridor project is not included in the Plan, 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 (P3) will be halted.** Therefore, we are requesting a Plan amendment at the October 9, 2013 MPO Policy Committee meeting to keep this regionally significant project moving forward.

Forecast Assumptions

As part of project planning, IDOT and other agencies such as the Illinois Tollway carefully consider the regional data contained in regional plans as a starting point, and make adjustments as appropriate for project level planning. **IDOT is using a "market based" forecast methodology to satisfy the requirements of the National Environmental Policy Act (NEPA).** Our methodology was approved by CMAP staff at the beginning of the Illiana planning process (footnote 14 on page 8 of CMAP's July 30, 2013 evaluation), and is the same basic methodology that has been used by CMAP and its predecessor agencies for decades. NEPA requires a more rigorous, project level analysis that provides a detailed measurement of the direct, indirect and cumulative effects of the project. A market based forecast is also critical for preparing investment grade traffic and revenue studies, which are used by both IDOT and the Illinois Tollway for ultimately determining the financial viability of tolled projects.

During the Transportation Committee Meeting, there seemed to be a focus on the differences between IDOT and CMAP's "no build" forecasts, which diverts attention from the critical issue, the impact of building the project. **CMAP's analysis (figures 4 through 8), which is consistent with IDOT's analysis, shows that the Illiana Corridor project would not have a significant impact upon the urbanization of the region. In addition, CMAP's figures 9 and 10 document that the Illiana would be a strong trucking corridor.**

Cost Estimates/Project Financing

As noted in CMAP's memo on pages 3 and 4, IDOT furnished supporting information with respect to the Illiana Corridor project cost, including a detailed description of assumptions (Tier One EIS Appendix G) as well as examples of lower cost projects. The Illiana Corridor project cost estimate is based upon recent construction prices in both Illinois and Indiana, and quantities derived from the preliminary Illiana design. Our cost estimate also includes additional factoring for materials and labor costs in the study area. At the end of this month, the Illiana Corridor project cost estimate will be formally reviewed by the FHWA, and IDOT will share the results of this analysis when it is completed. **Despite the information provided by IDOT thus far, CMAP staff has concluded that the Illiana Corridor project cost is low, but it is important to recognize that this conclusion was based on a more cursory review.**

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With respect to project financing, IDOT and the Indiana Department of Transportation (INDOT) are preparing to issue a Request for Qualifications, which will formally kick off the process for ultimately selecting a concessionaire team to implement the Illiana Corridor project. As noted in CMAP's July 30, 2013 evaluation, certain aspects of the P3 process must remain confidential to ensure a competitive bidding process, depending upon the type of procurement that is pursued. We will provide other financing information as it becomes available. **Overall, it is important to recognize that IDOT will develop a financing strategy that does not assume the removal of any other projects from the fiscally constrained portion of the Plan.**

Local Planning

CMAP only briefly acknowledges (page 18) IDOT's ongoing efforts with Will County and the corridor communities with respect to land use planning, and does not highlight the fact that Will County is proceeding with the adoption of the Illiana Corridor project into their Comprehensive Plan. Further, since beginning Tier Two earlier this year, the Illiana Corridor project team has conducted over 60 meetings regarding local land use and potential project impacts. In addition, IDOT has provided a \$500,000 grant to Will County to facilitate updates to local plans. While CMAP's conclusion that local plans may not reflect the Illiana project may be technically correct, it marginalizes the substantive fact that planning for the Illiana corridor is extensive and ongoing. Comparisons to local planning for the proposed South Suburban Airport (SSA) are also not meaningful, given that the SSA has been discussed for decades. **In addition, as noted above, both IDOT and CMAP agree that the Illiana Corridor project will not significantly increase the urbanization of the region.**

Conclusion

The Illiana Corridor project is consistent with the major goals of the Plan, and the project was acknowledged by CMAP prior to formal adoption of the Plan in October 2010. This set the stage for IDOT's comprehensive planning process, and this request for a Plan amendment. IDOT and INDOT have advanced the NEPA process on an accelerated schedule, which has been a goal of stakeholders both locally and nationally for decades, and is a key feature of MAP 21. IDOT also has had a longstanding practice of collaborating with CMAP and its predecessor agencies to develop project level analyses, enhance the technical aspects of regional planning, and support the implementation of each successive plan. While the Plan represents a major change from CMAP's past forecasting practices, it is very important to keep in mind that NEPA, and the requirements for a project level analysis, have not changed. Regardless, both IDOT and CMAP have concluded that the Illiana Corridor project will not have a significant impact upon the urbanization of the region, and will be a strong trucking corridor.

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Will County has emerged as a nationally significant inland port, with billions of dollars in goods being imported and exported. Beyond our comprehensive analysis, it's simply common sense that we make strategic transportation investments such as the Illiana Corridor project to maintain and strengthen this existing economic center, and in doing so, strengthen the region.

Thank you, we look forward to working with you on this regionally significant project, and IDOT staff is available at your convenience to provide a project briefing and answer questions.

Sincerely,



Ann L. Schneider
Secretary

Attachment

**IDOT COMMENTS ON JULY 30, 2013
CMAP STAFF EVALUATION MEMORANDUM OF THE ILLIANA CORRIDOR
TO THE TRANSPORTATION COMMITTEE
August 19, 2013**

The Illiana project is consistent with the major themes of GO TO 2040, particularly in addressing Regional Mobility. The Illiana Corridor will provide a vitally needed east-west link that improves travel locally, regionally, and even nationally by providing an alternative for trucks passing through the region and for interstate truck and auto traffic on I-80. It will allow for more efficient freight movement through the region by improving access to one of the largest existing intermodal freight areas in the U.S. The Illiana project is consistent with CMAP's User Pays goal as it is proposed as a tolled facility, and the use of innovative financing in the form of a public-private partnership (P3) to leverage private investment. The Illiana project team has also worked with Will County and the affected communities to integrate the Illiana project into their local plans to ensure consistency with the Livable Communities theme. The Illiana project will create jobs and economic development supporting CMAP's Human Capital theme. In addition, IDOT is conducting an inclusive, transparent process to develop the Illiana Corridor Environmental Impact Statement (EIS), which is consistent with the Efficient Governance theme.

IDOT has reviewed CMAP's July 30, 2013 staff evaluation of the proposed amendment to the GO TO 2040 Plan to include the Illiana Corridor project. Overall, the key CMAP evaluation findings were similar to the Illiana Corridor Study findings. Both CMAP and IDOT show that building the Illiana will result in a small increase in the urbanization of the region. Both CMAP and IDOT show similar improvements in travel performance, and demonstrate that the project will serve as a strong trucking corridor. As noted below, IDOT believes that the Illiana project is viable from a financial perspective and that the environment and local planning has been comprehensively addressed in the tiered EIS process.

Our comments on the memorandum are presented below.

1. **Project Status:** The planning work (i.e., EIS) for the Illiana Corridor project was included in the fiscally constrained portion of the GO TO 2040 Plan, and set the stage for initiating studies in the Spring of 2011. The Illiana planning process has been a great success thus far, with completion of the first portion of the EIS process (Tier One) through a partnership with stakeholders across a bi-state 950 square mile study area, as well as partnerships between two State DOTs, two Federal Highway Administration division offices, and all of the bi-state region's environmental regulatory agencies. This represents an unprecedented level of stakeholder participation, technical expertise, and agency oversight, with literally hundreds of stakeholder and agency meetings that supported the Tier One findings and approvals.

CMAP staff has participated in the process from the very beginning, with extensive data sharing, one on one meetings, and as a member of the Illiana Corridor Planning Group. However, CMAP's staff evaluation only briefly acknowledges Tier One and the ongoing Tier Two efforts. Instead, CMAP has created a new process for evaluating the

Illiana project that marginalizes the NEPA process. The level of information being furnished by IDOT in support of this Plan amendment request is well beyond the level of technical detail and stakeholder outreach undertaken for any project considered in the development of the GO TO 2040 Plan. 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 will be halted if the project is not in the fiscally constrained plan. Therefore, IDOT is requesting a Plan amendment at the October 9, 2013 MPO Policy Committee meeting to keep this regionally significant project moving forward.

2. Project Cost: We believe that the comparison of the Illiana project to the I-355 south extension and IL-53 north extension projects is inappropriate, as the I-355 and IL-53 extension projects include urban design elements, while the Illiana project is a rural design. The I-355 and IL-53 extension parametric unit prices must consider adjustments for urban elements not included in the Illiana project, such as wider travel lanes, concrete median barrier, multi-lane urban crossroad/overpass bridge construction, urban interchange signalization, a higher number of retaining walls and noise barriers, wider median shoulders, closed drainage systems, and cash collection systems, among other elements.

CMAP's observation that "IDOT's estimate of the project cost is low relative to other comparable projects" is not warranted, given the justification above, as well as considering the additional construction cost information that IDOT provided to CMAP staff on I-69 in Indiana and US-67 in Illinois. Based on actual bid prices, the cost per lane mile for Section 3 of I-69 was \$2.1 million per lane-mile as compared to \$5.9 million per lane-mile for the Illiana project. The geographic difference between the I-69 area and the Will County/Lake County are unit prices is approximately 25-30% higher based on IDOT and INDOT cost data from recent projects. Also, IDOT's US-67 project in Morgan County was let in June 2011 and had a cost of \$1.5 million per lane-mile for a new 6.5-mile four-lane expressway facility. Furthermore, IDOT's Illiana cost estimate is based on a detailed item quantity take-off based on the preliminary roadway profile and cross sections. Unit prices were developed from historical unit prices in Indiana and Illinois. This is consistent with the "rigorous" approach that should be used to estimate construction costs for major capital projects.

Since the Illiana Corridor project has an estimated total cost of \$500 million or more and will receive Federal financial assistance, it is considered a Major Project under FHWA guidelines and must undergo a Cost Estimate Review by the FHWA. IDOT, INDOT, and FHWA will be jointly participating in the Cost Estimate Review from August 27-30, 2013. During this review, FHWA will examine the project in great detail and approve a final cost estimate for the project under a traditional design-bid-build scenario. The final cost estimate will be made publicly available and provide further documentation of the thorough process that has been undertaken to determine the estimated project cost.

In addition, one of the greatest benefits of a P3 approach for delivering a major capital project, such as Illiana, is cost savings. Potential concessionaires have incentives to expedite completion, which typically lowers costs, to seek innovative methods for

managing, designing, selecting materials, and constructing the projects to improve efficiencies and lower costs.

3. CMAP GO TO 2040 Fiscal Constraint: As part of the GO TO 2040 Plan, CMAP developed a transportation financial plan which details the amount of funding that is reasonably expected to be available for all transportation investments from 2010-2040. CMAP determined that \$10.5 billion will be available for major capital projects that are considered a high priority to meet regional transportation needs. Projects determined to meet this criteria are considered “fiscally constrained”. There are also many other important regional projects, including the Illiana Corridor project, that are listed as “fiscally unconstrained”, due to the need for further planning and cost estimates. CMAP indicates that these projects may be reconsidered for inclusion in the fiscally constrained part of the plan as more detailed planning studies are available, and the project is proven to be financially viable.

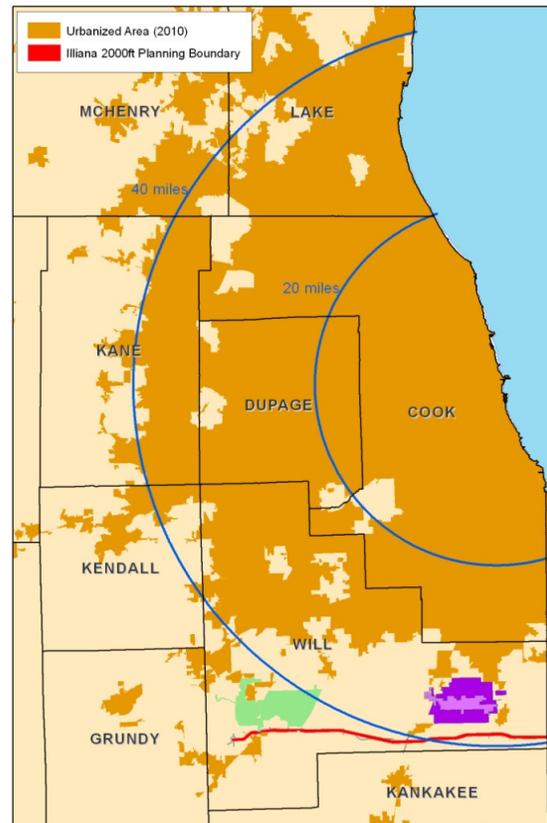
During several CMAP committee meetings in August 2013, CMAP staff alluded to the possibility that if the Illiana Corridor project is added into the fiscally constrained portion of the GO TO 2040 Plan, they may remove other projects to stay within the \$10.5 billion they have currently allocated for major capital projects. IDOT does not agree that this will be necessary. As part of the plan amendment process, IDOT will demonstrate how the Illiana can be added to the GO TO 2040 Plan without removing any of the other fiscally constrained projects.

4. Other Highway Expansion Costs: CMAP’s staff evaluation noted that the I-55 and I-80 Add Lanes projects included in IDOT’s “No-Build Scenario” were not included in the fiscally constrained portion of GO TO 2040, and estimated the total cost of the two projects would be \$1.5 billion based upon a very cursory analysis. These projects are very important for the region, and assumed to be in place by the year 2040 regardless of whether or not the Illiana Corridor project is implemented. I-55 and I-80 are existing corridors that were constructed decades ago, and will require complete replacement, which would be largely covered in the system maintenance portion of the GO TO 2040 Plan. Using recent contract pricing for the I-55 widening from Weber Road to I-80, the incremental cost of adding a lane in each direction is expected to be \$102 million for I-80 and \$68 million for I-55 (in 2013 \$), and financial plans will be submitted as the NEPA process is advanced for these two corridors. We will continue to coordinate the ongoing I-80 study with CMAP and other stakeholders, and work to ensure that these projects are addressed in the 2014 quadrennial update of the regional plan.

As part of maintaining the existing interstate system, improvements to these corridors are needed prior to the year 2040. For example, although the I-80 from Ridge Road to US Route 30 project is not in GO TO 2040, IDOT recently requested and CMAP approved into the TIP over \$60M in a series of I-80 bridge replacements to address the most deficient bridges in the corridor (TIP 09-12-0036). We expect these corridor improvements to continue to be implemented in multiple stages over the next 30 years to address the already deteriorating infrastructure conditions.

5. Financing and Public-Private Partnership: IDOT and INDOT have initiated a procurement process for a P3 for the Illiana project. A Request for Information (RFI) Regarding an Innovative Project Delivery Approach for the Illiana Corridor Project was released by IDOT and INDOT on May 29, 2013. The RFI provided an opportunity to receive industry feedback prior to and at the Illiana P3 Industry Forum and associated one-on-one meetings with industry participants on June 24 and 25, 2013. As mentioned in the CMAP staff evaluation, a Request for Qualifications (RFQ) will be released this fall, followed by a Request for Proposals (RFP). Due to the potential for a P3 procurement for the Illiana Corridor, some financial information will need to remain confidential in order to not jeopardize the procurement process and to ensure competition and innovation among the potential concessionaires. The P3 procurement will be halted if the project is not in the fiscally constrained plan

6. 2010 Urbanized Area: The proposed South Suburban Airport and the Midewin National Tallgrass Prairie should be added to Figure 3 of CMAP's staff evaluation, so that reviewers understand that much of the land area in the middle of Will County is not available for development. It would also be useful to add concentric circles (20 and 40 mile radii) from the Chicago Loop to this figure. Will County has undeveloped areas that are closer to the regional center than many other areas in the northern, northwestern, and western quadrants. Infill within Will County is consistent with CMAP's goal for a more-compact region. The attached figure provides a better illustration of the Illiana and its relationship to the region.



7. Population and Employment Forecasts: The CMAP staff evaluation emphasizes the fact that the Illiana Corridor study team did not use the population and employment numbers associated with CMAP's preferred scenario to develop their "Build" and "No Build" socioeconomic forecasts. However, the socioeconomic forecasts developed by CMAP and IDOT serve different purposes. CMAP's socioeconomic forecasts are policy-driven, which means they are based on government entities implementing policies between now and 2040 that support CMAP's preferred scenario. Their forecasts were developed at a regional level. In order to satisfy the requirements of the National Environmental Policy Act (NEPA), IDOT must develop more focused project-level population and employment forecasts under both "Build" and "No-Build" scenarios. Throughout the development of the Illiana Corridor EIS, IDOT had several one-on-one meetings with CMAP to discuss

the forecasting methodology to be used for the study. During these meetings, IDOT submitted and secured CMAP's concurrence on the methodology used to develop the project-level socioeconomic forecasts.

In describing IDOT's socioeconomic forecasts, CMAP's staff evaluation also omits two key inputs: the 2010 Census and independent Woods and Poole economic forecasts. Unlike the CMAP socioeconomic forecasts, the IDOT socioeconomic forecasts incorporated the results of the 2010 Census. This is important, as the previous 2009 Census estimates used by the CMAP socioeconomic forecasts had some significant discrepancies to the actual 2010 Census results. For example, the City of Chicago 2010 Census population was 200,000 persons lower than the previous 2009 Census estimate.

In addition, the IDOT socioeconomic forecasts used independent Woods and Poole economic forecasts at the county level. Woods and Poole is a well respected economic forecasting firm with government clients across the country, including the Regional Transportation Authority.

Figures 4 - 8 in CMAP's staff evaluation give the impression that the differences between the two build forecasts are due to the Illiana project. Most of the differences between the two forecasts are due to the overall forecast assumptions and are reflected in the "No-Build" scenario. CMAP's and IDOT's impacts of Illiana (the difference between the "Build" and "No-Build" scenarios in both) are almost the same. Most of the difference in the Build versus No-Build scenario is in Will County where the difference in population is 5,998 persons for CMAP, and 4,809 persons for IDOT. Similarly, for employment in Will County, CMAP's difference is 2,947 jobs versus 13,910 jobs in the IDOT forecasts. Communities had reviewed the IDOT build scenario population (average increase of 10 persons per square mile in townships adjacent to the Illiana) and employment growth projections and found them reasonable and consistent with their goals of manageable economic growth.

Lastly, since the Illiana Corridor will be a tolled facility, the socioeconomic forecasts will be used to estimate traffic, tolling, and revenue numbers. The Illiana Corridor Tier One EIS included tolled scenarios, assuming traffic retention on the Illiana ranging from 25% to 75% for screening alternatives (page 2-80 of the FEIS) and from 30% to 60% traffic retention for the EIS alternatives (page 2-104 of the FEIS). For the purposes of securing bonds for roads, more detailed financial forecasts are required at the project-level. IDOT has utilized forecasting methodologies that are similar to those used by the Illinois State Toll Highway Authority (ISTHA) for the same purpose.

8. Freight: The growing role of freight on the economy (particularly on the study area) and on traffic congestion in the southern half of the region, and the role of Illiana in mitigating such congestion should be noted. Improving freight movement efficiency is a goal of GOTO 2040, and the project location is at existing established national freight infrastructure such as railroads, interstate highways, intermodal facilities, and airports. It is important to provide linkage between these facilities. As noted in CMAP's staff evaluation, the Illiana would carry the highest percentage of truck traffic of any major capital project in GO TO 2040.

9. Impact on Regional Traffic Performance: CMAP’s staff evaluation indicates that the Illiana will provide no significant congestion relief for travelers within the urbanized area. At the regional level, the Illiana is only 47 miles out of a much larger 461 mile expressway system. The congestion relief benefits associated with the project must be put in the proper context.

Figure 8 of the CMAP memorandum shows 40,000 vehicle hours per day of overall travel time savings for the CMAP Build versus No Build (or 96,000 vehicle hours per day for the IDOT Build versus No Build). These travel time savings have a significant value. Assuming a value of time of \$24 per hour¹ results in almost \$1 million worth of time savings every day.

Figures 8-10 in CMAP’s staff evaluation show percentage change in congested VMT and VHT, all rounded to the nearest percent. This does not provide a complete description of performance, because as seen in the table below, the major new facility projects in GO TO 2040 all have very small changes in hours of congestion (all less than 1%, except for the Central Lake County Corridor and Illiana [IDOT Build]). Almost all new transportation projects will have very small percentage change effect on the region, due to the sheer size and enormous amount of travel in the seven-county northeast Illinois region.

Major Capital Project	% Change in Hours of Congestion
<u>Illiana Project</u>	
CMAP Build	0**
IDOT Build	-3%**
Central Lake County Corridor (IL-53 north and IL-120 limited access)*	-4.33%
Elgin O’Hare East Extension, Add Lanes & West O’Hare Bypass*	-0.74%
West Loop Transportation Center*	-0.06%
CTA Red Line Extension South*	0
I-294 / I-57 Interchange*	+0.25%

* Source: GO TO 2040 Major Capital Projects, Originally drafted February 2010, Updated October 2010

** CMAP rounded this figure to the nearest percent

By only showing Figure 10: Impact of the Illiana on CMAP Region Expressways in the CMAP memorandum, the benefits to non-expressway facilities (arterials and collector roads) are not recognized. As seen in the table below, both the CMAP Build and IDOT Build show vehicle miles of travel and vehicle hours of travel savings for arterials and collectors, which more than offsets the increases in the expressway VMT and VHT.

¹ Source: NCHRP Report 456, Guidebook for Assessing the Social and Economic Effects of Transportation Projects (value of vehicle time escalated by CPI-U for Chicago region and a typical mix of passenger and trucks assumed)

Regional Travel Demand (on arterials and collectors)	CMAP No-Build	CMAP Build	IDOT No Build	IDOT Build
Vehicle Miles of Travel (000)	132,277	131,935	138,691	136,125
Vehicle Hours of Travel (000)	5,110	5,058	5,648	5,514

Source: Figure 8 Total VMT & VHT minus Figure 10 Expressway VMT & VHT

10. **Economic Impacts:** Based on the content of the CMAP staff evaluation, IDOT is not clear on the methodologies CMAP used to determine the Gross Regional Product (GRP) estimates. As documented in the Illiana Tier One EIS, IDOT utilized PRISM™, a regional economic impact modeling framework to evaluate the impacts of transportation sector investments on the regional economy (<http://prism.pbworld.net/pbcms/web/prism/home>). This software incorporates a variety of factors to determine the economic output for the project including short-term construction impacts, long-term accessibility impacts, and tax estimates.

Compared to major new facility projects in GO TO 2040 (GRP estimates from GO TO 2040 Major Capital Projects, Originally drafted February 2010, Updated October 2010), the 2040 IDOT Build scenario for the Illiana has the highest improvement over the baseline for GRP.

Major Capital Project	Change from CMAP 2040 GRP Baseline	% Change
<u>Illiana Project</u>		
CMAP Build	+425,000,000	+0.053%
IDOT Build	+\$2,000,000,000	+0.20%
Central Lake County Corridor (IL-53 north and IL-120 limited access)*	+755,000,000	+0.12%
Elgin O'Hare East Extension, Add Lanes & West O'Hare Bypass*	+\$294,000,000	+0.047%
CTA Red Line Extension South*	+\$30,000,000	+0.0048%
West Loop Transportation Center*	+\$21,000,000	+0.0034%
I-294 / I-57 Interchange*	+\$3,000,000	+0.0005%

* Source: GO TO 2040 Major Capital Projects, Originally drafted February 2010, Updated October 2010

11. **Environmental Indicators:** The CMAP environmental analysis as illustrated in Figures 14 - 16, using either forecast methodology, shows a minor impact associated with the Illiana project. However, the format of the memorandum focuses readers on the differences in methodology, rather than the actual project impacts.
12. The paragraph should recognize that all biologic and cultural resources were examined in Tier One based on an extensive GIS database with 130 layers of resource information. The Illiana planning process has been a great success thus far, with completion of the Tier One EIS process through a partnership with stakeholders across

a bi-state 950 square mile study area, as well as partnerships between two State DOTs, two Federal Highway Administration division offices, and all of the bi-state region's environmental regulatory agencies. This represents an unprecedented level of stakeholder participation, technical expertise, and agency oversight, with literally hundreds of stakeholder and agency meetings that supported the Tier One findings and approvals of the selection of the B3 Corridor.

13. Impervious Surface: Utilizing total impervious area as a basis for describing potential changes in watershed health presents a "worst case scenario" of potential impacts. However, the effective impervious area for this proposed project is the key to analyzing watershed impacts. The effective impervious area is typically less than the total impervious area and is affected by watershed-specific practices and the best management practices incorporated into the design. CMAP has acknowledged that low impact development practices can reduce potential effects. The findings of the Tier Two EIS will present a more accurate and representative picture of the "effective impervious area".
14. Regional Green Infrastructure: The Refinement of the Chicago Wilderness Green Infrastructure Vision (GIV) Final Report identified environmental resources in the Illiana Corridor study area, including forging natural resource linkages to Midewin and other natural areas, protection of high quality streams, and recognition of specific resources of concern such as grassland birds and wildlife movement. Further analysis of these resources as part of the Tier Two studies is underway, including a detailed assessment of the condition of grassland birds (particularly at Midewin), potential impacts, minimization of these impacts, and potential mitigation measures. As the GIV identifies grassland birds as a critically threatened resource, the project team has closely coordinated the grassland bird impact assessment strategy with the US Fish & Wildlife Service, US Environmental Protection Agency, US Army Corps of Engineers, Midewin Tallgrass National Prairie managed by the Forest Service, USDA, and the IL Department of Natural Resources.

Regarding the GIV exhibit and key green corridors identified, the Illiana project team has analyzed the riparian corridors in the vicinity of the project, and has considered the connectivity of these corridors to natural areas north and south of the Illiana Corridor including Midewin. Many of the resources impacted as noted in the CMAP staff evaluation (280 acres) are unavoidable given the predominant east-west orientation of Illiana Corridor. The project team is developing strategies for maintaining the riparian corridors for wildlife movement and protecting water quality in these streams through the use of natural buffers. Detailed stream assessments have been completed to identify high quality aquatic resources and measures to protect these resources will be presented in the Tier Two document.

15. Water Use: Regarding groundwater supply, the best management practices (BMPs) being considered for the Illiana Corridor would filter stormwater runoff, detain, and, to some extent, promote infiltration of stormwater runoff. Infiltration can promote groundwater recharge.

BMP swales and basins would be constructed along the Illiana roadside wherever they can physically be installed and provide a functional benefit. BMP swales include roadside ditches or swales designed to optimize pollutant removal. The BMP swales and basins (and other infiltration BMPs) may be designed with gravel bases that, to the extent possible (based on the underlying geology), would be over-excavated to intersect with the underlying parent sands and gravels to promote groundwater recharge and limit surface water runoff. The BMP swales and basins could be designed to capture a water quality volume which would reduce the total surface water discharge volume from the site. These facilities would be designed to have native species and typically have wetland bottoms. The Illiana design and analysis assumes that the water quality volume would be based on a 0.75 inch event. Rain events at or below this volume would be captured onsite and infiltrated, evaporated, or evapotranspired.

16. Technical Task Force Meetings: It should be noted that key county and local planning officials and agencies that will be responsible for working together on a corridor land use plan participated in the Illiana Land Use Technical Task Force meetings. Also, a detailed set of visions, goals and strategies that are consistent with CMAP GO TO 2040 policies and goals were an outcome of the process. The products of the Technical Task Force include: (1) a commitment by Will County and local land use agencies to work together on a corridor land use plan and (2) specific participant-developed strategies that will be considered and that are consistent with regional goals and objectives for concentrating future development near existing communities. Careful consideration was also given to strategies that would protect and support agriculture and environmental resources in the corridor. Communities along the corridor agreed that the Illiana build scenario population (average increase of 10 persons per square mile) and employment growth projections are reasonable, and consistent with their goals of modest manageable economic growth.

Since beginning Tier Two earlier this year, the Illiana project team has conducted over 60 meetings regarding local land use and potential project impacts. In addition, IDOT has provided a \$500,000 grant to the County to facilitate updates to local plans. While CMAP's conclusion that local plans may not reflect the Illiana project may be technically correct, it marginalizes the substantive fact that planning for the Illiana corridor is extensive and ongoing. Comparisons to local planning for the proposed South Suburban Airport (SSA) are also not meaningful, given that the SSA has been discussed for decades.