



## MEMORANDUM

**To:** Programming Coordinating Committee

**Date:** February 7, 2008

**From:** CMAP Staff

**Re:** DRI materials

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Please note that the materials from all the previous DRI meetings are posted on our website under the Programming Committee minutes and agendas:

<http://www.cmap.illinois.gov/programming/minutes.aspx>

Below are two comments we have received regarding the DRI Overview document distributed earlier. These issues need to be addressed in the discussions at the meeting next week.

Comments from John Greuling:

- Regarding Physical Planning thresholds (page 4) under Transportation - we will need to put a fine pencil to the "expanded" definition as a review threshold;
- Water supply - extension of a water line to a facility with 500 jobs by itself is too small to be a review threshold - we might want to look at capacity of the extended line or ultimate service area (I believe this is already part of the FPA process - correct?)
- Under Housing, I forget the reason for the review of homes priced >125% of median value;
- Employment: I think both of these thresholds are bad. Again, the 500 job level would make every new business and industrial park a DRI. The wages of the employees vs. the available housing is going to be a political firecracker and, quite frankly, immaterial to the local community economic development process in smaller communities.
- Business Attraction & Retention: Just the use of a state or local incentive program by itself should not trigger a review. Many incentives are prescriptive: if you do X, you get Y (such as an enterprise zone or a TIF benefit); the negotiated ones are key to bringing many jobs to our region and

to put up a DRI review in the middle of a deal negotiation will chase good paying jobs away. I disagree with this threshold.

- Taxation: Why review a tax change of >than .5%? What makes this a DRI threshold? Ditto on the fee changes.
- Land Conversion: for the expanding suburbs a 100 acre threshold does not make a DRI. I though we had talked about 1,000 acres.

Also, some reference or recognition of the fact that other regional reviews of DRI's may also be required, thus diminishing the amount of review CMAP needs to do with these.

Comments from Tam Kutzmark:

Thank you for the opportunity to comment on this overview. Below are DMMC's comments.

We also plan to share an update on the DRI process with our Board of Directors on Thursday morning. If you have any questions about our comments, please feel free to contact me.

General Comments

- The outline does not include a definition of DRI, beyond the legislative reference and the general terms "regionally significant land use or economic development proposals," "large-scale development proposals," and "Large-scale development proposals [which] have the possibility of introducing widespread primary and secondary impacts to the daily activities of significant numbers of people."
- The subcommittee specifically requested staff to incorporate a two-tier approach to determining 1) what should be evaluated as a potential DRI (tier 1), and 2) what should be identified as an actual DRI (tier 2). Quantitative measures were a high priority to the subcommittee. However, this approach does not appear to have been incorporated into the draft outline. The Regional Impact Assessment is qualitative in nature and does not seem to meet these expectations.

Page-specific Comments

- Page 2 – A link is proposed between the capital projects to be included in the regional comprehensive plan (RCP) and the projects to be identified as DRIs. The document says that "efficiencies may be gained by establishing the DRI evaluation process as the entry point for inclusion in the [plan]." To the best of my knowledge, this is a *new* proposal that was *not* requested by or vetted to the subcommittee. Moreover, using DRI analysis as screening for the RCP may be in conflict with FHWA/FTA regulations concerning the "MPO Long Range Transportation Plan (LRTP)". CMAP intends for the RCP to be the region's LRTP and should be careful about this. Yes, transportation projects being considered for the RCP should be evaluated against "regional plans",

but CMAP should be careful about making it a "requirement" for inclusion of projects in the RCP, at least for transportation.

- Page 3 – The process should define the "regional plans" to which DRIs will be compared. Obviously the RCP is one, but does this include RTA plans, municipal and county Comprehensive Plans, other "regional" plans dealing with public transit, stormwater, water supply, etc?
- Page 3 – A reference is made to "regional scale" and whether projects are "low" or "high." Low or high what? Impact? Cost and benefit? This section should be clarified.
- Page 4 – For the Transportation category, add "New or Significant Modifications (requiring an Interchange Justification Report or Interchange Modification Report to meet NEPA requirements) to interchanges." Also add "freight rail and other major public transit" (not just rail, for example, the DuPage J line BRT). For transit/airports, "downsizing" should be included in addition to new or expanded.
- Page 4 – The Transportation category should also identify quantitative measures, such as average daily traffic and ridership counts, freight/airline capacity, etc.
- Page 4 – In the "Land Use" category, an additional sub-topic should be included for "Other traffic generators" using the measure "expected to generate > \_\_\_\_ daily trips," based on the ITE Trip Generation Manual.
- Page 4 – In the Housing category, the home pricing bullets should be changed from "homes" to "developments." DRIs are not intended to apply to single homes or isolated "estates", particularly in more rural areas.
- Page 4 – The Housing category proposes the number of housing units as the quantitative measure; it may be more appropriate to use the density of housing units instead. Also, the language should be "dwelling units", not "homes", as "homes" implies single family detached units.
- Page 5 – In the Employment, Terminals, and Recreation categories, the quantitative measures should be daily traffic thresholds, in addition to # of employees, parking spaces, etc. This will trigger reviews for traffic purposes *and* for other infrastructure (water, energy supply, etc.) purposes.
- Page 5 – Under Business Attraction and Retention, federal or state incentives or legislation" should only be considered DRIs in terms of guiding federal and state dollars to support regional goals but not by limiting local efforts to attract and retain business.
- Page 5 – Taxation should not qualify as "developments" for the purposes of DRI review by CMAP. Although CMAP may have an interest or role in evaluating the impacts of these actions, these are not DRIs.
- Page 6 – The Natural Preserves category should be revised from "Proposals to create a natural preserve > 100 acres" to "Proposals to create or remove or change the use of a natural preserve > 100 acres."

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Process Questions

- What are the next steps in the process for developing a DRI review?
- What is the status of the DRI Task Force? What stakeholders have been added to the list since the list was circulated in Fall 2007? How many seats will local government have on the Task Force? How will they be selected?

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