



# Chicago Metropolitan Agency for Planning

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March 14, 2012

Via e-mail: [Kesti.Susinskas@Illinois.gov](mailto:Kesti.Susinskas@Illinois.gov)

Mr. Kesti Susinskas  
Illinois Department of Transportation (IDOT)–Region 1  
201 West Center Court  
Schaumburg, Illinois 60196-1096

Dear Mr. Susinskas:

While construction of the Illiana Corridor is not part of the GO TO 2040 comprehensive regional plan's fiscally constrained major capital projects list for northeastern Illinois, funding for Phase I Engineering – the next step in the development of the project – is included within the plan's fiscally constrained project list. This inclusion of the engineering costs demonstrates the region's support for its continued development.

The development of GO TO 2040 included an extensive process to select the fiscally constrained list (also referred to as "priority list") of major capital projects. That prioritization process had three phases. First, projects were evaluated based on their support for the GO TO 2040 Preferred Regional Scenario, which among other things calls for more compact, mixed-use development and transportation investments targeted to achieve outcomes such as economic growth, environmental protection, and congestion reduction. Second, each project was evaluated on the basis of extensive performance measures or "indicators" that were developed with assistance from the Volpe Center, part of the U.S. Department of Transportation's Research and Innovative Technology Administration. Third and finally, because a number of projects have undergone previous analysis, information from these other studies was considered. The final selection process combined quantitative and qualitative factors within each of the three phases described above. The priority capital projects are consistent with objectives of GO TO 2040, which calls for investment in the existing system, use of innovative transportation finance methods, support for freight, and a focus on improving the public transit system.

While the proposed Illiana Expressway's construction costs are on the fiscally unconstrained rather than constrained list, that does not mean the project is undesirable or not recommended. As with nearly every project

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March 14, 2012

Page 2

on the unconstrained list, more detailed information and financing information was needed for these projects to be further considered. That was the case for the proposed Illiana and, as GO TO 2040 states, the rationale for including the construction costs on the unconstrained list is two-fold.

First, as noted in our comments in the Purpose and Need for the Illiana Corridor, CMAP's major concern is one that is a common theme in transportation: how to pay for the facility. The GO TO 2040 plan calls for additional analysis of Illiana financing options, including potential private funding sources. Second, the segment of the project between I-55 and I-57 needed to be studied, and a wide variety of alignments and interchange points with I-55 are possible. The cost of the project, as well as its benefits, is dependent on the option chosen. CMAP supported initiating Phase I engineering for the project in order to narrow the project scope to a few feasible alternatives that will enable further evaluation.

Given this direction, we are concerned with the Preliminary Recommendation to carry forward only the B3 alternative from the second round screening. The Purpose and Need Statement identifies the need to improve regional mobility and to address local system deficiencies. By choosing an alignment that is well south of any substantial development, while minimizing property impacts, the corridor has little positive effect on regional mobility and local system deficiencies. The screening results clearly showed that, as the location shifts south, travel performance decreases.

Also, since it is assumed that this will be a toll facility of some type, the B3 alternative's decrease in performance not only fails to fully address the purpose and need, it also will likely not generate sufficient revenue to construct and maintain the facility.

And finally, while considering quality of life in northeastern Illinois, GO TO 2040 seeks to direct investment toward strengthening existing communities, and finding opportunities to encourage new development and redevelopment in livable communities that are denser and designed for mixed uses. Focusing primarily on the B3 alternative may encourage future development outside existing communities. Continued analysis of alternative routes is necessary, to consider whether they can provide a focus for development and redevelopment within existing communities that is consistent with GO TO 2040.

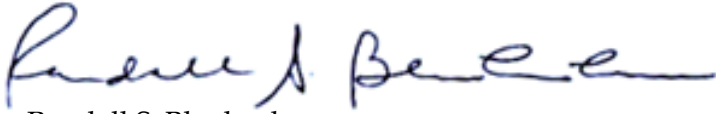
Our understanding is that, to this point in the analysis, all screenings have been done assuming a free facility; that is, no toll has been applied to the facility. For a facility that will obviously need to be a toll road, it is premature to focus on a single alternative without results showing the impact of various toll fees. We would encourage the Illinois Department of Transportation to carry forward additional northern corridors through the Draft Environmental Impact Statement. That information will be pertinent both to the continuation of this current process and, ultimately, to how this project will be evaluated for potential inclusion in the prioritized, fiscally constrained major capital project that is part of GO TO 2040, the region's official long-range plan.

March 14, 2012

Page 3

Thank you for the opportunity to comment on this Second Round Alternatives Evaluation and Screening.

Sincerely,

A handwritten signature in blue ink, appearing to read "Randall S. Blankenhorn". The signature is fluid and cursive, with the first name being the most prominent.

Randall S. Blankenhorn  
Executive Director

JL:RSB/stk