



ACTIVE  
TRANSPORTATION  
ALLIANCE

9 West Hubbard Street  
Suite 402  
Chicago, IL 60610-6545

T 312.427.3325  
F 312.427.4907  
info@activetrans.com  
www.activetrans.org

September 3, 2013

Chicago Metropolitan Agency for Planning (CMAP)  
ATTN Plan and TIP amendments  
233 S. Wacker Dr.,  
Suite 800, Chicago IL 60606  
[info@cmap.illinois.gov](mailto:info@cmap.illinois.gov)

The Active Transportation Alliance strongly opposes inclusion of the proposed Illiana Expressway (Illiana) in the *GoTo2040 Comprehensive Regional Plan's* list of fiscally constrained major capital projects (MCP).

Our concerns echo those raised by the Metropolitan Planning Council and a coalition of environmental groups including the Sierra Club and Openlands. In particular, we believe there is an unacceptably high risk that, if constructed, the Illiana will require significant public funds to supplement its private financing. In addition, the project will provide relatively small transportation benefits while spurring transportation and land use patterns that are inconsistent with *GoTo2040's* goals and undermine the creation of a truly efficient regional transportation network.

With our region's transportation infrastructure already woefully underfunded, the region should not risk diverting money away from the maintenance and operation of pressing transportation needs to a project like the Illiana which has comparatively small transportation benefits, as detailed in CMAP staff's July 30<sup>th</sup> memo to the Transportation Committee regarding this proposal. Future transit funding levels, for example, are projected to meet only 1/4th of what is needed for a state of good repair. (Chaddick Institute for the Illinois Chamber of Commerce, DePaul Univ. 2012).

We also oppose the Illiana because experience shows that building new highways in the Chicagoland region, particularly in the exurbs where the Illiana would be located, will over time lead to more driving, more congestion, and development patterns that are not conducive to walking, biking and transit. These outcomes are inconsistent with *GoTo2040's* sustainability goals as well as its focus on developing the region around existing road and transit corridors and nodes to make travel more efficient and limited public dollars go further. Active Trans is not anti-car, but we strive to avoid making our region more car-dependent while also less suitable for other transportation options.

On behalf of the Active Transportation Alliance and our more than 7,000 members across Illinois, I appreciate the opportunity to provide these comments.

We urge you to oppose the inclusion of the Illiana Expressway in *GoT2040's* fiscally constrained MCP list. Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Ron Burke". The signature is written in a cursive, slightly slanted style.

Ron Burke  
Executive Director  
Active Transportation Alliance  
9 West Hubbard Street, Suite 402  
Chicago, IL 60654-6545  
312-427-3325 x228

-----Original Message-----

From: CMAP Web Support [<mailto:cmap@support.thirdwavellc.com>]

Sent: Thursday, August 22, 2013 9:16 PM

To: Info

Subject: Contact CMAP

\* Full Name : Judith A. Lihota, Calumet Ecological Park Association

\* Address : 12932 S. Escanaba Ave.

\* City : Chicago

\* State : Illinois

\* Zip Code : 60633

Business Phone :

Home Phone : 773.646.4773

\* Email Address : [judy1646@yahoo.com](mailto:judy1646@yahoo.com)

Comments/Question : Do not add the Illiana Tollway to the GO TO 2040 Plan. It is too expensive and will diminish the habitat along the border of the Midewin National Tallgrass Prairie and the Des Plaines Conservation Area.

September 2, 2013



Mr. Randy Blankenhorn  
Executive Director  
Chicago Metropolitan Agency for Planning  
233 South Wacker Drive, Suite 800  
Chicago, IL 60606

## **CNT Comments Regarding Illinois Department of Transportation's Request to Include the Illiana Tollroad as a Constrained Project in the GO TO 2040 Plan**

### **Illiana Corridor: Wrong Place, Wrong Time, Wrong Investment**

Placements matter. *Places* matter. When places grow efficiently, close to jobs, and along transit routes, the *people* in these places have greater choice between communities in which to live, employment opportunities close to home, and multiple transportation options connecting the two. Compact cities allow people, goods, and ideas to flow freely without an overreliance on automobiles or fossil fuels.

Until recently, fragmented land use and transportation planning emphasized congestion and capacity above spatial efficiency and growth. New communities grew at the expense of old ones. People and jobs moved farther away from one another. Cheap oil reinforced the illusion of growth, but surging energy prices have revealed the risk of this approach.

CMAP has recognized these perils of "business as usual." *GO TO 2040* signals a more sustainable course for our region and one that will keep it globally competitive for decades to come. Its blueprint of policies represent a path to resilient, long-term prosperity: livable communities where households enjoy broader choices for housing, jobs and transportation; investments coordinated across multiple agencies working towards the same objectives; commitment to efficient public transit and rail freight systems; and a list of fiscally constrained projects that have been analyzed and endorsed by a broad consensus of regional stakeholders. Over the course of the plan's development, CMAP demonstrated that the economic benefits of sustainable land use patterns could be understood and embraced by a broad cross section of communities large and small, urban and suburban.

***The addition of the Illiana Expressway to GO TO 2040 would put those principles and the consensus behind them at risk.*** It will bring growth impacts to corners of our region unable to manage them and at the expense of other communities working hard for balanced and sustainable growth. It shifts job growth from six counties to just one, with little aggregate job creation, and creates winners and losers in the name of economic development. It signals a return to infrastructure investments focused on capacity and flow that drive housing and jobs further apart from one another. It will keep us moving along the unsustainable path that CMAP has worked so diligently to reverse.

**CNT opposes the inclusion of the Illiana Expressway as a fiscally constrained project in *GO TO 2040* because it fails the plan’s vision in three ways:**

- 1. Justification for the Illiana Corridor reflects outdated assumptions about economic development and its construction will do little to increase regional prosperity**
- 2. It is not a cost-effective investment given other pressing transportation needs**
- 3. The Illiana would bring ancillary impacts that have not been fully considered**

*Justification for the Illiana Corridor reflects outdated assumptions about economic development and its construction will do little to increase regional prosperity.*

- **IDOT has justified the project using anachronistic projections of population growth.** Between 2010 and 2040, CMAP projects that 17% of population growth will occur outside of the current urbanized boundary. IDOT projects 36% of population growth will occur in these places. IDOT has repeatedly characterized its projections as “market based.” These projections predict only that what has happened over the last thirty years will continue over the next thirty regardless of generational preference or technological change. However, past performance is not a guarantee of future results. As Baby Boomers reach retirement and downsize, the housing market will rely on an equivalent number of Millennial households to occupy their homes just to stabilize prices and vacancy rates. At the same time, surveys find that Millennials prefer smartphone technology and computers before automobiles and televisions, and will demand housing units and communities built around these technological changes. IDOT’s estimate of 923,801 *additional* people in unurbanized areas assumes that future generations will demand hundreds of thousands of additional units in communities built for 20<sup>th</sup> century technology. The market is not moving in this direction.
- **The Illiana would not spur significant net growth or job creation within northeastern Illinois.** Transportation investments add value in a regional economy when they lower costs and enhance the flow of people, goods, and ideas within and between activity hubs. The Illiana would do none of these things. Both sets of economic forecasts demonstrate this. CMAP projects a meager \$425 million increase in Gross Regional Product should the Illiana be constructed. CMAP also projects that the construction of the Illiana Expressway would create 3,766 permanent positions through 2040 from its “no build” scenario. IDOT estimates a higher rate of GRP growth, but also projects that the construction of the Illiana would result in 8,192 fewer jobs than the “no build” scenario.
- **IDOT projections of job growth in Will County come at the expense of every other county.** IDOT projects that the Illiana will sustain an additional 13,910 jobs in Will County as compared to the “no build” scenario. With meager job creation regionally, these additions come at the expense of every other county in the CMAP planning area. According to IDOT’s “market based” projections, total jobs in Cook County would decrease by 6,794, total jobs in DuPage would decrease by 2,723, and total jobs in Lake County would decrease by 4,227. Job creation in Will County will occur because the Illiana Expressway positions cheap farmland to capture development that would occur elsewhere anyway – and not because the investment would add net economic activity to the region.

- **The Illiana would spur development on greenfields at the expense of underutilized land.** CMAP has set an ambitious goal of the redevelopment of 10,000 acres of underutilized land by 2040. One of the highest identified concentrations of underutilized land sits in southern Cook County between the city of Chicago and I-80, where two major intermodal terminals, five freight rail lines, four transit lines with 33 stations, and four expressways converge. Because of this rich assortment of freight assets, the Southland could support significant cargo-oriented development (COD) serving regional, national (via I-80) and international (via CN Railroad) markets. The construction of the Illiana would shift some of this economic activity to parcels of more cheaply assembled farmland at the expense of existing communities and tax bases in southern Cook County. IDOT has claimed that its projections do not demonstrate that the Illiana would result in a significant increase in urbanization in southern Will County, but it recently justified the project in an August 20 memorandum by noting that it may spur development within a 40 mile concentric circle of the Chicago Loop. This is implicit recognition that the Illiana will bring significant land use changes on the urban periphery. CNT believes that new development will occur at the loss of existing communities and will make it more difficult for CMAP to achieve its redevelopment targets.
- **Low income and minority communities in southern Cook County stand to lose.** This shift in COD to greenfields would disproportionately affect towns with larger low income and minority populations than the CMAP planning area as a whole. IDOT does not include an analysis of environmental justice benefits or disbenefits for any of the protected populations in the region. An EJ assessment at a minimum, should include the impact on the protection of human health and safety, equal access to the economic opportunities they claim, and the natural environment.
- **The Illiana hinders our region's capacity to lower the cost of transportation.** *GO TO 2040* aims to reduce the percentage of income spent on housing and transportation by moderate-income residents by 45%. CNT research finds that the cost of transportation begins to surpass the cost of housing when the average commute for a worker earning the median household income rises above ten miles. As noted earlier, the Illiana could spur development on greenfields 40 miles or further from our region's largest employment center. Our region's next four largest job centers along I-90 and I-88 would also be about 40 miles from any new development. Absent a widespread expansion of the transit system into southern Will County, the Illiana will set CMAP backwards in its goal to reign in transportation spending.

*The Illiana is not a cost-effective investment given other pressing transportation needs.*

- **The Illiana barely reduces truck congestion relative to its cost.** Under CMAP's assumptions, the percentage of vehicle miles traveled for heavy trucks considered "congested" would decrease by a mere 1%. IDOT estimates a percentage decrease of just 2%. These modest improvements are not worth the estimated \$1.25 billion price tag and \$950 million Illinois share that IDOT has published. It is true that the Illiana Expressway would immediately relieve truck congestion along I-80 that connects intermodal facilities around Joliet to markets in the east coast. However, if the Illiana spurs the development of logistics facilities on farmland in southern Will

County, it could create new congestion over the long term as trucks drive longer and farther to make deliveries elsewhere in the region. Rather than increasing the supply of lane miles, new improvements should decrease demand by improving the efficiency and reducing the distance of truck movements. The resurfacing and reconstruction of existing intermodal connectors like Center Street in Harvey would achieve that goal.

- **IDOT has presented a rosy assessment of the project cost to taxpayers.** CMAP has produced a compelling analysis of the per lane mile costs of the I-355 and planned IL-53 expansions in our region and comparable truck by-pass alignments in other regions. All of these investments cost substantially more than IDOT estimates.
- **IDOT has not released the estimated revenue that the Illiana would generate.** There is a limited pot of money for fiscally constrained projects. Without an estimate of the amount of revenue that a public-private partnership would bring in, one cannot estimate how much of the cost and risk will be borne by taxpayers.

*The Illiana would bring ancillary impacts that have not been fully considered:*

- **The Illiana could degrade regional open space.** IDOT has not provided compelling justification that the project advances the open space goals of *GO TO 2040*. Additional noise and traffic from the Illiana would adversely affect wildlife within the Midewin National Tallgrass Prairie, which *GO TO 2040* lists by name the single largest prairie preserve in northeastern Illinois. Noise and pollution from trucks would also negatively impact the sanctuary of Abraham Lincoln National Cemetery, where the President honored military veterans in 2010. CNT recognizes that IDOT believes it can address the effects of the Illiana on the Midewin Prairie and through sustainable design elements. However, IDOT has not produced substantive analysis to demonstrate that its road design would not negatively impact these resources.
- **There is no accounting for 33 additional miles of expressway to be constructed around Joliet.** This investment, made in addition to the Illiana, would be the equivalent of a new lane of expressway from the Circle Interchange to the urban periphery in Monee. These have not been included in the \$1.25 billion dollar estimate nor in IDOT's assessment of the Illiana's conformity with *GO TO 2040*, but will be included in the Environmental Impact Statement coming later this year. If these lane miles are crucial enough to the success of the Illiana to be included in the EIS, they should also be considered in IDOT's assessment of conformity with *GO TO 2040* as well as its estimate of project cost. CMAP should evaluate the combined merits of the projects when considering an amendment to *GO TO 2040*. This evaluation should be made available to CMAP Working Committees and the public.
- **Local communities are not equipped to manage the long term impacts of the Illiana.** Through its Local Technical Assistance program, CMAP has helped towns with limited staff and strategic planning capacity understand and plan for integrated transportation and land use outcomes. In its evaluation of the Illiana, CMAP has made clear that few towns along the Corridor have prepared for it in their comprehensive planning. Development could come quickly to southern Will County. In the absence of planning and staff capacity to weigh the benefits and drawbacks

of different land use choices, that development could occur haphazardly and at odds with the livability goals of *GO TO 2040*.

**CNT does not believe that the benefits of Illiana justify the price of the project.** It will do too little to grow our economy, will cost too much money, and will negatively impact our environment and rural communities. As IDOT has noted, the \$40 million expended for planning and procurement may be lost if CMAP does not add the Illiana as a fiscally constrained project. This sunk cost represents a significant investment in taxpayer money, but it is just a fraction of its \$1.25 billion dollar price tag. The Illiana should be evaluated on its merits, not the costs that IDOT incurred prior to seeking this amendment.

*GO TO 2040* set a new standard for our region to grow sustainably, spend wisely, and make decisions holistically. It is our region's consensus plan and the vision that all stakeholders should follow. IDOT invested \$40 million on this project before requesting its addition to the plan. This is not the right approach and it would set a poor precedent for the evaluation of future capital projects. CMAP has worked hard to include transportation agencies, representatives from every county, and regional advocates in the conversation when evaluating the merits of changes to *2040*. CNT urges CMAP, its Board, and the MPO Policy Committee to listen to these voices when considering this plan amendment. It should not be included as a constrained project in the Long Range Plan or the TIP.

Sincerely,

A handwritten signature in black ink that reads "Kathryn Tholin". The signature is written in a cursive, flowing style.

Kathryn Tholin  
Chief Executive Officer

**From:** [John Krause](#)  
**To:** [Info](#)  
**Cc:** [Sara Feigenholtz](#)  
**Subject:** GO TO 2040 and TIP Amendment Public Comment  
**Date:** Thursday, August 29, 2013 9:17:58 AM  
**Attachments:** [PastedGraphic-1.tiff](#)

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## **Please say no to Illiana.**

We're stuck in a hole: burdened with inefficient transportation infrastructure that is too expensive to build, operate, or maintain. Illiana is just digging the hole deeper.

There are lots of good ideas out there for getting us out of the hole we've driven into. We need to be investing in some really great alternatives to cars and highways. In some cases, the efficiency gain is a revenue stream sufficient to cover the cost of the investment.

The modern streetcar is a cost-effective way to expand rapid transit and a proven catalyst for transit-oriented development. It's an appropriate response to dramatic demographic and behavioral changes that demand less driving and more opportunities to live in mixed-use, walkable urban neighborhoods. The city and state should be actively engaged in responding to that demand by investing in alternatives to driving, like rapid transit, safe cycling, and local shopping and jobs. The streetcar facilitates all three, saves a ton of money over the bus service it replaces, and generates enough development and economic growth to pay for itself.

**John**

John Krause, Executive Director  
Chicago Streetcar Renaissance  
2754 N Hampden Ct No 804  
Chicago, IL 60614  
+1 312 810 1525  
[chicagostreetcar.com](http://chicagostreetcar.com)  
[CSR blog](#)



# Chicago Wilderness

August 30, 2013

Chicago Metropolitan Agency for Planning  
ATTN: Plan and TIP amendments  
233 S. Wacker Dr., Suite 800  
Chicago, IL 60606

RE: Illiana Tollway Conflicts with Chicago Wilderness Green Infrastructure Plan

Dear Chicago Metropolitan Agency for Planning (CMAP) Board and Staff:

As Executive Director of Chicago Wilderness, I am writing to express our deep concern over the proposed addition of the Illiana Tollway to GO TO 2040, and the anticipated negative impact of such an addition to implementation of the Chicago Wilderness Green Infrastructure Vision (GIV). The GIV serves as the foundation for the Expand and Improve Parks and Open Space section of GO TO 2040.

The proposed tollway would conflict with goals outlined in the Chicago Wilderness GIV, which guides the protection and development of an accessible, interconnected network of healthy ecosystems that contribute to economic vitality and quality of life for all the region's residents. The GIV maps the goals of the Chicago Wilderness Biodiversity Recovery Plan, an ambitious blueprint for saving and restoring the rare natural communities of the Chicago region — our prairies, savannas, woodlands, and wetlands. The Plan was developed by hundreds of constituents including scientists, land managers, conservation advocates, planners, and caring citizens.

With the GIV and Biodiversity Recovery Plan in mind, we are concerned about the impact of the proposed tollway on our regions' natural assets. The Illiana Tollway will diminish the value of habitat beyond the border of the Midewin National Tallgrass Prairie and at the nearby Des Plaines Conservation Area, as well as degrade the high quality waters of the Kankakee River and other nearby creeks of ecological significance. This poses a risk to multiple endangered species at the state and federal levels.

As the CMAP staff analysis states, the road is also inconsistent with GO TO 2040's call for investing in existing communities and modernizing our current transportation and infrastructure assets. The proposed tollway would foster sprawl rather than support existing communities, and thereby increase the area of impervious surfaces and the discharge of pollutants into natural areas.

Chicago Wilderness is a regional alliance that connects people and nature. We are more than 300 organizations, including CMAP, that work together to restore local nature and improve the quality of life for all living things, by protecting the lands and waters on which we all depend. Chicago Wilderness is a proud partner with CMAP in implementing the GO TO 2040 Plan and in advancing our shared goals of sustainable development.

Should you have any questions regarding how the proposed addition of the Illiana Tollway to GO TO 2040 would negatively impact our region, we would be pleased to provide additional information.

Sincerely,  
Melinda Pruett-Jones  
Executive Director

**From:** [CNU\\_IL](#)  
**To:** [Info](#)  
**Subject:** Plan and TIP amendments  
**Date:** Tuesday, September 03, 2013 2:33:10 PM

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On behalf of our 160 members, CNU Illinois urges our regional leaders to not approve the proposed amendment to include the Illiana corridor project in GO TO 2040. We believe that this project fundamentally contradicts the vision that was developed during the plan and, if approved, will take away needed resources for completing vital components of the plan.

CNU Illinois is a local chapter of the Congress for the New Urbanism (CNU), a national organization promoting walkable, mixed-use neighborhood development, sustainable communities, and healthier living conditions. Many of our members participated in the creation of GO TO 2040 and were strong supporters of its adoption. Many more of our members are working to implement the plan's components in their roles as architects, engineers, developers, and planners across the region.

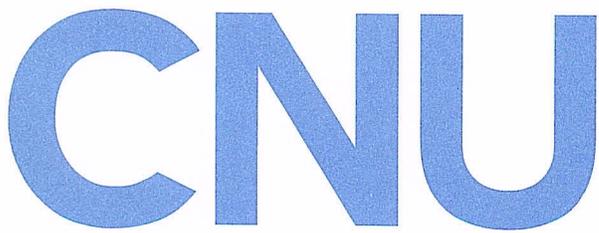
The vision articulated in GO TO 2040 shares many of the same ideas espoused in the Charter for the New Urbanism, a set of principles that started the movement in the 1980s. For example, GO TO 2040 encourages development in existing communities, where infrastructure is already available. This concept is one of the first principles in the Charter:

Development patterns should not blur or eradicate the edges of the metropolis. Infill development within existing urban areas conserves environmental resources, economic investment, and social fabric, while reclaiming marginal and abandoned areas. Metropolitan regions should develop strategies to encourage such infill development over peripheral expansion.

In contrast, the Illiana proposal expands the size of our region by pushing auto-oriented transportation corridors outside of our urbanized area. It promotes the spread of development in valuable wetlands and agricultural fields and away from existing transit systems. And it does all of this while potentially pulling funding away from other projects identified as priorities during the GO TO 2040 process, such as the Red Line extension.

As the first major challenge to GO TO 2040, all eyes are on whether the regional leadership remains committed to this sustainable vision. By upholding the plan, and voting down the amendment, the region's leaders will reassert the importance of the planning process. On behalf of the CNU Illinois membership, we strongly oppose this amendment.

Board of Directors of CNU Illinois  
[www.cnuil.org](http://www.cnuil.org)  
[illinois@cnu.org](mailto:illinois@cnu.org)



CONGRESS FOR THE NEW URBANISM

140 S. Dearborn St.  
Suite 404  
Chicago, IL 60603

312.551.7300  
312.346.3323 *fax*

[cnu.org](http://cnu.org)

August 26, 2013

CMAP: Chicago Metropolitan Planning Agency  
Attn: MPO Policy Committee (Ann Schneider and Jeffrey Schielke)  
233 S. Wacker Dr., Ste 800  
Chicago, IL 60606

RE: Plan and TIP Amendments

Dear Chairwoman Schneider and Vice Chairman Schielke:

As President and CEO of the Congress for the New Urbanism, a Chicago based organization of approximately 2500 architects, planners, engineers and local officials, I wish to comment on the GO TO 2040 Plan amendment to include the Illiana Expressway in the region's long-range Transportation Improvement Plan (TIP). I encourage the MPO Policy Committee to consider smaller scale network-based highway solutions to address the population forecast and freight needs for the Illiana Corridor.

IDOT can better improve traffic distribution and travel time in the corridor with a combination of enhancements to existing facilities and smaller scale new facilities. By focusing on network performance instead of trying to load traffic onto one giant new facility, IDOT can meet its population forecasts and freight needs at a much lower cost to the State of Illinois. IDOT should improve connections between existing streets and thoroughfares. This will enhance rather than disrupt existing neighborhood trip patterns. This approach is also more likely to increase property values, minimize environmental impacts and build a robust, adaptable system that can adjust to changing travel patterns. A combination of four and two-lane thoroughfares are also better suited for improving local access in the region than one limited access, high capacity expressway.

One example of a less expensive roadway already exists in the corridor, US Route 30, which runs from the Chicago area to Fort Wayne, Indiana. It has grade separations at major intersections, but also has at grade connections. It is a major through route for truck movements, but also coexists with local traffic distribution. Another example is Illinois Route 24, presently a two-lane highway, which could be converted to a four-lane thoroughfare. Modest improvements to the existing network of highways and streets coupled with

one or two smaller scale new highways is more likely to actually absorb and accommodate future demand than building one giant expensive super-highway.

From all public reports Illinois is in financial crisis and funding for the Illiana has not been identified. Prudence should dictate that IDOT and CMAP develop less expensive alternatives before embracing a mega project that taxpayers of Illinois can't afford.

I compliment the Illinois DOT for its recent openness to new ideas. IDOT and CMAP have demonstrated great enthusiasm for transportation reform. Transit, bicycling and walkability have become mainstream policy within both organizations. The existing GO TO 2040 Plan clearly identified strategies that address mobility, accessibility, and freight movements in ways that optimize the transportation system as a whole. Including the Illiana Expressway project, as it currently stands, would be a step backward to the time when IDOT single-mindedly promoted super-highway capacity expansion with little or no consideration for community and environmental concerns. The current 2040 Plan signals a new era of wise investment aimed at adding value to the region while improving the environment. Please reject the addition of the Illiana Expressway to the 2040 Plan.

Sincerely,



John O. Norquist  
President & CEO

Chicago Metropolitan Agency for Planning  
233 South Wacker Dr., Suite 800  
Chicago, IL 60606

Dear Chicago Metropolitan Agency for Planning Members:

The Dunelands Group of the Hoosier Chapter of the Sierra Club opposes the Illiana Expressway.

We recognize the hard work that has gone into developing the GO TO 2040 Plan which lays the foundation of a better future for the region. The highway would destroy or degrade habitat for rare and important species, pollute the Kankakee River and put more pressure on the supply of clean water. Building a new highway and potentially a new airport to the south of the majority of existing infrastructure will consume important agricultural land and natural areas, and lead to more sprawl. Building the Illiana Expressway is in conflict with the plan.

The Illinois Department of Transportation and Indiana Department of transportation have underestimated the financial costs, overestimated the economic benefits, and minimized the negative impacts to the environment and communities.

Please DO NOT amend the GO TO 2040 Plan to include the Illiana Expressway. Please tell IDOT and INDOT “NO. Building the Illiana is in conflict with the GO TO 2040 Plan and will not be added.”

Thank you for consideration of our comments.

Dunelands Group of the Hoosier Chapter of the Sierra Club

**From:** [Jim Sweeney](#)  
**To:** [Info](#); [Erin Aleman](#)  
**Cc:** "[Melinda Pruett-Jones](#)"; "[Donald R. Dann](#)"; "[Jacky Grimshaw](#)"; "[Roger Shamley](#)"; [jmengler@heyassoc.com](mailto:jmengler@heyassoc.com); "[Andrew Armstrong](#)"; [michaelhow@msn.com](mailto:michaelhow@msn.com); "[Tom Clay](#)"; [shepsharp1@comcast.net](mailto:shepsharp1@comcast.net); [j-snarr@northwestern.edu](mailto:j-snarr@northwestern.edu); "[GERALD W HEINRICH](#)"; "[Lorin Schab](#)"; "[joan soltwisch](#)"; "[Kim Knowles](#)"; [gcollins@prairierivers.org](mailto:gcollins@prairierivers.org); "[Cindy Skrukud](#)"; "[Jack Darin](#)"; [mothy3@aol.com](mailto:mothy3@aol.com); "[Colleen Smith](#)"; "[Fran Harty](#)"; [rmosey@tnc.org](mailto:rmosey@tnc.org); "[Paul Botts](#)"; [carelockport@usa.com](mailto:carelockport@usa.com); "[Stacy Meyers](#)"  
**Subject:** RE: Joint Comments re IDOT Illiana Request  
**Date:** Tuesday, September 03, 2013 6:38:30 PM  
**Attachments:** [image001.jpg](#)

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Please note, at our August board meeting, the Friends of the Kankakee voted in support of an option of "No Build" regarding the proposed Illiana Tollway.

Our board is equally divided in Indiana and Illinois residents.

Jim Sweeney, Secretary  
219-322-7239

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**From:** Stacy Meyers [<mailto:SMeyers@openlands.org>]  
**Sent:** Tuesday, September 03, 2013 11:41 AM  
**To:** [info@cmap.illinois.gov](mailto:info@cmap.illinois.gov); Erin Aleman  
**Cc:** Melinda Pruett-Jones; Donald R. Dann; Jacky Grimshaw; 'Roger Shamley'; [jmengler@heyassoc.com](mailto:jmengler@heyassoc.com); Andrew Armstrong; [michaelhow@msn.com](mailto:michaelhow@msn.com); Tom Clay; [shepsharp1@comcast.net](mailto:shepsharp1@comcast.net); [j-snarr@northwestern.edu](mailto:j-snarr@northwestern.edu); Jim Sweeney; GERALD W HEINRICH; Lorin Schab; joan soltwisch; Kim Knowles; [gcollins@prairierivers.org](mailto:gcollins@prairierivers.org); Cindy Skrukud; Jack Darin; [mothy3@aol.com](mailto:mothy3@aol.com); Colleen Smith; Fran Harty; [rmosey@tnc.org](mailto:rmosey@tnc.org); Paul Botts; [carelockport@usa.com](mailto:carelockport@usa.com)  
**Subject:** Joint Comments re IDOT Illiana Request

Good morning.

Attached please find a joint comment letter to the staff and Board of the Chicago Metropolitan Agency for Planning, and members of the MPO Policy Committee. The organizations listed below request that the CMAP Board vote against including the Illiana tollroad as a constrained project in our region's GO TO 2040 plan, and that the MPO Policy Committee reject including the road as a constrained project in the region's Transportation Improvement Program.

Thank you for your time and attention.

Regards,

Bird Conservation Network  
Center for Neighborhood Technology  
Chicago Audubon Society  
Citizens Against Ruining the Environment  
Environmental Law and Policy Center  
Fuller Park Community Development

Illinois Audubon Society  
Illinois Paddling Council  
Illinois Division of the Izaak Walton League of America  
Indiana Chapter, Izaak Walton League of America  
Midwin Heritage Association  
Midwin Tallgrass Prairie Alliance  
National Audubon Society, Chicago Region  
Openlands  
Prairie Rivers Network  
Prairie Parklands Ecosystem Partnership  
Sierra Club, Illinois Chapter  
The Nature Conservancy, Illinois  
The Wetlands Initiative

**Stacy Meyers**

Policy Coordinator



25 East Washington Street  
Suite 1650  
Chicago, IL 60602  
T: 312.863.6265  
F: 312.863.6251  
[smeyers@openlands.org](mailto:smeyers@openlands.org)  
[openlands.org](http://openlands.org)

**From:** [BFisher928@aol.com](mailto:BFisher928@aol.com)  
**To:** [Info](#)  
**Subject:** We oppose the Illiana tollway  
**Date:** Monday, August 26, 2013 9:08:49 PM

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## CMAP Board and Staff

Our membership unanimously opposes adding the Illiana Tollway to the GO TO 2040 Plan. It's a direct contravention of the GO TO 2040 vision. Your own staff report states that Illiana is inconsistent with GO TO 2040's emphasis on investing in existing communities and modernizing our existing transportation/infrastructure assets. The Illiana Tollway is projected to cost more than \$1 billion - and that projection is surely a lowball estimate. Where will these funds come from? Probably from funds already aimed at GO TO 2040!

The Illiana is an outrageously expensive, unsustainable money eating sinkhole with a terrible anti environmental footprint, which will negatively impact the Midewin National Tallgrass Prairie, a natural area developed from the old Joliet arsenal via a collective effort to restore what has now become a globally important grassland in a landscape of ever diminishing grassland habitat. It will also irrevocably damage the Des Plaines Conservation Area, and will degrade the high quality Kankakee River.

And it will encourage sprawl, the direct antithesis of what GO TO 2040 is championing. Plus it paves over productive agricultural land to build a highway, producing yet another gridlock nexus. We can't afford Illiana, environmentally, financially and conceptually. It's motivation appears to be eerily similar to IDOT's misguided proposal to pave over some of the most important wildlands in Illinois - the ill conceived I66 proposal to link up Cape Girardeau with Paducah by paving over some of the natural jewels in Illinois, places like the Cache River wetlands, Cypress Creek Refuge, Horseshoe Lake, the Grapevine Trail through the Shawnee National Forest, the historic Trail of Tears, Union County Refuge, or the Mississippi bottomlands.

Do what's right and leave CMAP's clearly articulated vision for the region alone. Leave the Illiana tollway out of the GO TO 2040 vision plan!

Sincerely  
Bob Fisher  
President  
Illinois Ornithological Society  
630 985 2956  
[bfisher928@aol.com](mailto:bfisher928@aol.com)

# Illinois PIRG

## Education Fund

328 S. Jefferson, Suite 620, Chicago Illinois 60661

**To:** CMAP Board of Directors  
**From:** Brian Imus, Illinois PIRG Education Fund  
**Re:** GO TO 2040 and TIP Amendment Public Comment  
**Date:** August 27, 2013

Thank you for the opportunity for public comment on the proposed amendment to include construction of the Illiana tollway in the GO TO 2040 plan.

As CMAP's own analysis shows, the proposed Illiana tollway is not a public benefit to the residents and taxpayers of the Chicago Metropolitan region.

The road is inconsistent with the region's core principles to invest in existing communities and will mean fewer dollars dedicated to maintaining the region's current transportation assets in good working order.

The project is also out of step with current trends in driving. Miles driven per capita peaked in 2004 and the total number of miles driven by Americans peaked in 2007. The average American currently drives no more miles than at the end of President Clinton's first term. The Millennial generation is leading the change in transportation trends. 16 to 34-year-olds drove a whopping 23 percent fewer miles on average in 2009 than in 2001—the greatest decline in driving of any age group.

Baby Boomers are moving out of the phase in their life when they do the most commuting, while driving-averse Millennials move into that phase. These demographic changes will likely keep driving down for decades, according to a recent report released by Illinois PIRG Education Fund. Under some conservative scenarios outlined by the report, driving won't ever regain its 2007 peak during the range of the study, which extends to 2040.

This change in driving trends will have huge implications for the financial viability of tollway projects like the Illiana. And often, as noted by CMAP's analysis of IDOT's transportation estimates, there is a consistent pattern by official transportation forecasts of overestimating how much Americans will drive.

Consider Southern California's experience with several toll roads—some built and operated by private corporations—that have opened in the region between the early 1990s and late 2000s. Far from meeting the initial predictions of success, Southern California's toll roads have served as a cautionary tale of what can happen when millions of dollars are spent on expanded highways and the cars don't show up. Traffic on Orange County's San Joaquin Hills toll road fell short of projections almost immediately after opening. By 2010, traffic on the road was less than half of what had been anticipated. In San Diego County, the privately built South Bay Expressway,

which opened in 2007, fell so far short of its traffic projections that the private enterprise that built and operated the road was forced into a form of bankruptcy.

Illinois PIRG Education Fund opposes the addition of the Illiana Tollroad to the CMAP GO TO 2040 Plan. The road is unnecessary, will deplete scarce dollars away from other road projects and 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.

Sincerely,

Brian Imus  
Illinois PIRG Director

September 3, 2013

Mr. Randy Blankenhorn  
Chicago Metropolitan Agency for Planning  
233 South Wacker Drive, Suite 800  
Chicago, Illinois 60606

**RE: Comments Opposing IDOT's Request to Include the Illiana Tollroad as a Constrained Project in the GO TO 2040 Plan**

To Mr. Blankenhorn, the members of the Chicago Metropolitan Agency for Planning Board and the MPO Policy Committee:

Please accept these comments on behalf of the undersigned environmental, civic and conservation organizations. For the reasons below, we strongly urge the Chicago Metropolitan Agency for Planning (CMAP) and the MPO Policy Committee to deny the request by the Illinois Department of Transportation (IDOT) to add the proposed Illiana tollroad as a constrained priority project to our region's GO TO 2040 plan. The Illiana tollroad contradicts the principles embodied in our region's GO TO 2040 plan. As demonstrated by CMAP's commendable July 30, 2013 analysis, the tollroad is financially imprudent, offers minimal transportation value and disproportionately low economic benefits, and would unnecessarily damage vital natural resources.

**I. Introduction**

In considering whether to add the Illiana tollroad to the GO TO 2040 plan, we ask CMAP to keep in mind the thousands of hours of effort by stakeholders across the region that went into crafting the plan and its shared vision for our region's future. The Illiana tollroad fundamentally violates the goals, strategy and projects incorporated into the plan. In planning the tollroad, IDOT explicitly rejected the regional socioeconomic forecasts associated with the GO TO 2040 Preferred Regional Scenario – even though the General Assembly charged CMAP, not IDOT, with making socioeconomic forecasts which “shall be the foundation for all planning in the region.” 70 ILCS § 1707/44; 70 ILCS § 1707/51. In seeking this amendment, IDOT has ignored the plan's requirement to show fiscal constraint in funding all of the region's many transportation needs. If IDOT is allowed to override GO TO 2040's principles at this early stage of the plan's existence, it will render the plan irrelevant.

As a threshold issue, IDOT has failed to demonstrate that the proposed Illiana tollroad can be added as a “fiscally constrained” project to the GO TO 2040 plan, consistent with federal law. CMAP can only include projects on its “constrained” list if there are reasonably available revenue sources that can cover project costs. This determination is separate and distinct from the requisite environmental analysis under the National Environmental Policy Act (NEPA) – though related insofar as the NEPA process cannot be completed if there is no realistic way to finance the project.

In this case, IDOT has failed to present a coherent explanation of how the Illiana tollroad can be financed, and how much the public would have to pay for the project. IDOT has not demonstrated that the tollroad can be added to the fiscally constrained project list without cutting other transportation priorities that were vetted through the GO TO 2040 process, and are consistent with the vision and principles in the plan. While we see the value of solid public private partnership (P3) projects, we agree

with CMAP that “there is no free money” and that this proposal poses a high risk to both taxpayers and private investors.

In addition, in an attempt to justify building the Illiana tollroad 10 miles south of the exurban fringe, IDOT makes numerous assumptions about how and where our region will grow, which conflict with and seriously undermine the vision and core regional principles in GO TO 2040. The CMAP Board – including Will County representatives - unanimously adopted the GO TO 2040 comprehensive plan to strategically align public policies and investments, maximize scarce resources, and prioritize how the region spends its limited \$10.5 billion budget on new major capital projects over the next 30 years. The plan synthesized three years of research and careful evaluation by CMAP, partners, numerous stakeholders and over 35,000 residents, uniting over 284 communities to address our largest regional challenges.

The proposed Illiana tollroad represents the first major test of our comprehensive regional plan. CMAP’s acceptance would set a dangerous precedent for the plan’s further implementation. IDOT is ignoring the policies and performance-driven criteria in GO TO 2040, promoting unhealthy sprawl rather than modernizing our significant existing transportation assets. It defies the “Preferred Regional Scenario” in GO TO 2040, which calls for more compact, mixed use transit-oriented development, preserving open space, reinvesting in brownfields, and improving urban design and the pedestrian environment.

As a result, the proposed Illiana tollroad would misdirect development into rural areas that are productive agricultural communities, damaging the heart of a rare complex of 23 federally and state protected natural areas, such as the Midewin National Tallgrass Prairie and the high quality Kankakee River. It would violate the central principles of the Green Infrastructure Vision in GO TO 2040 by fragmenting and degrading this hub of natural wonders, taking globally imperiled habitat for federal and state-listed threatened and endangered plants and wildlife, like the Plains Leopard Frog and Franklin’s Ground Squirrel. The road would pull thousands of trucks right through the center of Midewin’s no-noise bird management zone, driving away rare protected grassland birds, like the state-listed endangered Henslow’s sparrow, that nest in this vast quiet landscape. This increased truck traffic on Illinois Route 53 would disturb mourners at the adjacent Abraham Lincoln National Cemetery, one of our nation’s largest resting places for military veterans.

Over time, the misplaced development would pave over soil in open areas that now soak rain into the ground, reducing the recharge of drinking aquifers. Instead, stormwater that runs off concrete and other impervious surfaces would increase flooding and inject unusually warm, salt-laden polluted stormwater into high quality rivers and creeks in the area, likely making them inhospitable for rare and endangered fish, mussels and other water species to survive.

We understand that IDOT has advised CMAP that, if it does not amend the GO TO 2040 plan during the October CMAP Board and MPO Policy Committee meeting, it will be impossible for IDOT to complete the NEPA study process, and IDOT’s \$40 million investment in studying the road will be lost. IDOT’s position is perplexing in several respects. First, IDOT has not provided any basis to conclude that the construction of this fringe tollroad is such an urgent need that immediate action is required. IDOT’s artificial rush to get a decision from CMAP before critical questions about financing the project can be answered seems designed to cut off a full and honest debate.

Second, IDOT’s reasoning that it, because the agency already spent \$40 million on studying the tollroad, it would be a loss not to spend at least another 30 times that amount building it, represents gross fiscal

mismanagement. By this logic, any time a project is studied, it must be constructed so as not to “waste” planning dollars. If a project moves the region in the wrong direction and is a bad investment, it should not be built – especially at the expense of other regional priorities. Third, and most importantly, IDOT’s sunk costs do not trump the federally-mandated role of CMAP in the transportation planning process to determine both fiscal constraint and the Illiana’s consistency with our region’s GO TO 2040 plan. The Illiana tollroad fails on both counts.

## **II. IDOT Has Failed to Demonstrate That the Illiana Tollway Can Be Included as a Fiscally Constrained Project.**

The Illiana tollroad does not meet a basic legal requirement for its inclusion in the GO TO 2040 plan: “fiscal constraint”. This threshold issue—applicable to both regional transportation plans like GO TO 2040 and transportation improvement programs—ensures that there are sufficient resources to build, operate, and maintain all of the transportation improvements needed across the region. The requirement is not met here because IDOT has not demonstrated how the tollroad could be financed with “committed, available, or reasonably available revenue sources.” 23 C.F.R. § 450.104. Instead, IDOT has provided only vague references to potential “public-private partnerships” (P3s) and federal Transportation Infrastructure Finance and Innovation Act (TIFIA) loans. Because IDOT has failed to provide realistic, coherent information about revenue sources or project cost, CMAP cannot, consistently with federal law, include the tollroad in the GO TO 2040 plan. Neither could the MPO Policy Committee add the tollroad’s construction to its Transportation Improvement Program (TIP). CMAP should not amend either the GO TO 2040 plan or the TIP unless and until IDOT explains how the Illiana tollroad could be paid for.

CMAP’s staff discussed the importance of fiscal constraint in its July 30, 2013 analysis (“CMAP Staff Report”):

Constraint for plans is important because it reminds regional decision makers to set priorities and make trade-offs rather than including an extensive list of projects and activities that may not be affordable or sustainable. ***In order for GO TO 2040 to be amended, the public costs for the Illiana Corridor . . . would need to be included within the plan’s fiscal constraint.***

CMAP Staff Report at p. 3 (emphasis added).

CMAP staff’s discussion accurately reflects that, under federal law, a metropolitan transportation plan like GO TO 2040 must contain a financial plan. 49 U.S.C. § 5303(i)(2)(E). This financial plan must demonstrate how the transportation plan as a whole can be implemented, and indicate the resources from public and private sources that are reasonably expected to be made available to carry out the plan. *Id.* GO TO 2040’s financial plan must demonstrate “that projects in the [GO TO 2040 transportation plan] can be implemented using committed, available, or reasonably available revenue sources, with reasonable assurance that the federally supported transportation system is being adequately operated and maintained.” 23 C.F.R. § 450.104. This is referred to as the requirement of “fiscal constraint.”

IDOT has failed to show how the Illiana tollroad could be financed with “reasonably available” revenue sources. There are two important pieces of information missing: (1) a realistic estimate of the tollroad’s cost, and (2) a description of the revenue sources that could finance the tollroad. We agree with the CMAP staff analysis, which carefully addressed both of these points.

First, with respect to the tollroad's cost, we share CMAP staff's opinion that "a more detailed cost estimate would be required to perform a robust evaluation of the proposed project's financial viability and its impact on GO TO 2040's fiscal constraint." CMAP Staff Report at 3. IDOT's cost estimate is simply implausible in light of the much higher costs per lane mile for a number of other highways that CMAP staff identified, including ones built in Illinois. In comments submitted to CMAP last week, the Metropolitan Planning Council (MPC) identified additional examples of highways with significantly higher costs per lane mile. Based on the figures in the CMAP staff and MPC reports, it is clear that IDOT's present cost estimates fail to support a determination of fiscal constraint.

We also note that the two examples that IDOT has provided in support of its cost estimates are irrelevant. IDOT has cited the bid prices of two projects: (1) Section 3 of the I-69 highway project in Indiana and (2) a "new four-lane expressway" in Morgan County, Illinois. As to Section 3 of I-69, it was constructed with less durable asphalt, instead of more expensive concrete. "Sizable cracks" developed shortly after the road was opened to traffic. See Jimmy Jenkins, *Cracks Develop Along Newly Opened Interstate 69*, INDIANA PUBLIC MEDIA (Jan. 31, 2013), available at <http://indianapublicmedia.org/news/cracks-develop-section-i69-44014/>. Indiana's former governor, Mitch Daniels, described the highway's design specifications as follows: "I don't see the need to build a Cadillac if a good solid Jeep or Chevy will suffice for 20-30 years." *Id.* Moreover, the Indiana Department of Environmental Management cited both the Indiana Department of Transportation and the contractor that built the highway—Fred Weber, Inc.—for numerous stormwater violations related to the highway's construction. Chris O'Malley, *IDEM: I-69 construction affecting streams*, INDIANA ECONOMIC DIGEST (Feb. 22, 2012), available at: <http://www.indianaeconomicdigest.net/main.asp?SectionID=31&ArticleID=64098>. (See also <http://www.fredweberinc.com/projects/indiana-i-69-project>).

As to the Morgan County "expressway" cited by IDOT, it is not in any way comparable to the proposed Illiana tollroad. According to IDOT's description of the project elsewhere, see <http://www.dot.state.il.us/press/r091511.html>, the project upgrades an existing road, with only a single interchange with an arterial road required. Compared to the numerous examples of highways with higher per lane mile costs that have been assembled by CMAP staff and MPC, neither of IDOT's examples provides a good reference for the proposed Illiana tollroad. Again, CMAP should reject IDOT's present cost estimates as unrealistic, imprudent and insufficient to support a determination of fiscal constraint.

Second, IDOT also has failed to explain how the Illiana tollroad would be funded. In IDOT's May 10, 2013 supporting documentation to its request to add the Illiana tollroad to the GO TO 2040 plan, IDOT demonstrated a stunning lack of financial planning for a road that it claims will begin construction about eighteen months from now. See <http://www.illianacorridor.org/P3/> ("IDOT and INDOT have established a target for construction to begin in the spring of 2015."). In the supporting documentation, IDOT asserted that it is "currently evaluating funding and financial strategies for implementing the Illiana Corridor." IDOT Documentation at 13. IDOT stated that it was studying "public-private partnership" (P3) models for the project. *Id.* IDOT further stated that all "design-build-finance-operate-maintain" P3 models are "**partly** financed" by debt-leveraging revenue streams, such as tolls, which are then often "supplemented" by "public sector subsidies." *Id.* (emphasis added). In addition to P3 models, IDOT states that it is "evaluat[ing]" the possibility of a loan pursuant to the federal Transportation Infrastructure Finance and Innovation Act (TIFIA). *Id.* IDOT did not share with CMAP, at even an rudimentary level, what portion of the project costs could be met by private financing through a P3

agreement, what portion through federal financing through TIFIA loans, and what portion by state taxpayers through so-called “public sector subsidies.” Consequently, we have no idea how much the public would likely have to pay for this project.

As CMAP staff discussed in its staff analysis, this level of detail is wholly inadequate to enable an analysis of the Illiana tollroad’s impact on GO TO 2040’s financial plan. In its analysis, CMAP staff stated that, without a decision regarding the preferred P3 model, “CMAP cannot evaluate the extent to which either proposed [P3] method would clarify elements like facility ownership, financing, performance standards, non-compete clauses, toll rates, or workforce issues, which are all necessary components for assessing how a proposed P3 facility would affect public costs.” CMAP Staff Report at 4. CMAP staff made clear that there are too many unanswered questions about the Illiana tollroad to adequately analyze its financial viability:

[C]onstruction of a new private toll facility . . . involves a high level of risk for both the public and private sectors. Most fundamentally, there is no ‘free money.’ Private loans must be repaid, and private partners will require a reasonable rate of return for their investors. To achieve these objectives, private partners will require a project of this type to generate a reasonable cash flow through tolling or public subsidy. Traffic levels must be projected with accuracy many years into the future, and the financial underpinning of a project is based on these projections. **To date, CMAP has not had access to any of the specific information about costs, revenues or the specific structure of any potential agreements to enable an analysis of how the Illiana Corridor will be financed or how the nature of the proposed P3 would protect the public interest.**

*Id.* at 5-6 (emphasis added).

Again, we agree with CMAP staff: it is impossible at this time to analyze the Illiana Expressway’s impact on regional transportation spending. Two crucial pieces of information missing from IDOT’s request to amend the GO TO 2040 plan are: (1) the amount of “public sector subsidies” that would be needed to fund the tollroad, IDOT Documentation at 13, and (2) the “reasonably available revenue sources” that would provide those subsidies. 23 C.F.R. § 450.104. Without this information, CMAP cannot consistently with federal law add the Illiana tollroad to the GO TO 2040 plan.

Federal Highway Administration (FHWA) guidance on the “fiscal constraint” requirement demonstrates the inadequacy of the information provided by IDOT to date. With respect to tolling revenues, FHWA has noted that “[w]hile tolling/pricing may be a means to pay back a variety of funding mechanisms (e.g. bond measures, private equity, and State revenues), toll revenues are usually used in combination with other fund sources.” FHWA, *Financial Planning and Fiscal Constraint for Transportation Plans and Programs Questions & Answers* (Apr. 15, 2009), Question 11(d), available at <http://www.fhwa.dot.gov/planning/fsclcntrntques.cfm>. Where tolling is proposed to be used as a funding source, it is “important” to know “[h]ow much funding is available each year through the proposed program.” *Id.* Moreover, where TIFIA loans are to be used as a funding source, fiscal constraint requires not only a reference to that revenue source, but also a financial plan that shows how the loan will be repaid. *Id.* at Question 11(e).

IDOT has failed to provide even a sketch-level analysis of these issues. We do not know what type of P3 model would be used, to what extent IDOT would seek TIFIA loans, or how exactly the state’s obligations would be repaid. We do not know the terms on which IDOT reasonably might seek financing. For

example, how would Illinois' lowest credit rating of any state in the nation affect bond financing? See Sara Burnett, *Illinois Credit Rating: State's Worst-In-Nation Rating Costing Taxpayers Millions*, ASSOCIATED PRESS (June 25, 2013), available at: [http://www.huffingtonpost.com/2013/06/25/illinois-credit-rating-st\\_n\\_3496264.html](http://www.huffingtonpost.com/2013/06/25/illinois-credit-rating-st_n_3496264.html) (reporting financial analyst's estimate that Illinois would pay \$450 million extra in interest costs over the 25-year life of a \$1.3 billion bond issue, relative to states with high credit ratings).

What is clear, though, is that, even for a new private toll facility, the Illiana Expressway is a highly speculative venture. Private tollways built on the urban fringe, with the expectation that population growth will support increasing traffic over the life of the road, have an exceedingly poor track record nationally. In its comments, MPC has provided several examples of failed tollroad projects that similarly were planned on the assumption of significant growth near the tollroad corridor.

The proposed Illiana tollroad bears all the hallmarks of another failed project waiting to happen. As described by the trade paper *Tollroads News*:

The 47 mile project is located about 15 miles south of, and parallel with, the Borman Expressway in open countryside and runs between I-55 in Illinois and I-65 in Indiana. There are no centers of population at either end of the route, no significant economic activity along the corridor, and it offers no obvious shortcut for any long distance travel.

\* \* \*

***Private investors are only interested in the project with an availability payments contract under which the states sponsoring the road accept the traffic and revenue risk, and cover losses out of state budgets.***

*Illiana Expressway approval challenged in court*, TOLLROADS NEWS (July 13, 2013) (emphasis added), available at [www.tollroadsnews.com/node/6637](http://www.tollroadsnews.com/node/6637).

Building the Illiana tollroad under an "availability payments" model would pose an extraordinary risk to regional transportation spending. IDOT has indicated that, depending on the level of the toll and willingness to pay, the Illiana tollroad could have average daily traffic as low as 8,800 vehicles in 2040. See *Illiana Alternatives Evaluation Report*, at 4-9. According to comments submitted by MPC last week, IDOT advised that it is currently modeling an average daily traffic of 14,000 vehicles for the tollroad, presumably also projected for 2040.

The level of 2040 traffic that IDOT reportedly predicts for the Illiana tollroad is far, far lower than the traffic currently handled by our region's existing expressways. For example, I-55 just west of the interchange with I-294 serves average daily traffic of 163,500 vehicles. See IDOT, *Getting Around Illinois GIS Tool*, available at <http://www.gettingaroundillinois.com/gai.htm?mt=aadt#>. In other words, I-55 today serves almost twelve times as much traffic as IDOT projects for the Illiana tollroad three decades from now. Some of the existing roads that currently carry the same average daily traffic the Illiana might carry in 2040 include: Dearborn Street, in Chicago's Old Town neighborhood; Collins Street in downtown Joliet; and Dierksen Parkway, adjacent to IDOT's Springfield headquarters.

This anemic level of traffic likely would not come close to supporting the cost of building the tollroad. This is shown by the June 2010 "sketch-level financial assessment" for the Illiana tollroad prepared by Cambridge Systematics for INDOT, discussed by MPC in its comments and attached hereto as Exhibit A.

The Cambridge analysis studied an earlier version of the Illiana project; the analysis relied on a much-higher average daily traffic for the Illiana tollroad and lower capital costs. *See id.* at page 2-4; 4-3. Even with that higher average daily traffic, though, the analysis found that toll revenues would not provide nearly enough bonding authority to meet the project's capital costs. *See id.* at 4-3.

In order to build the Illiana tollroad, the gap between its construction costs and the amount that could be financed through tolling revenues would have to be filled by another revenue source. However the gap is filled, the bottom line is that there will be less funding that could be used for other transportation needs. The projects that the region could no longer afford to build would have to be deleted from the plan.<sup>1</sup>

IDOT's request that CMAP include the Illiana tollroad in GO TO 2040 without providing adequate details on the tollroad's financial viability disrespects CMAP's federally mandated role in the transportation planning process. Under federal law, CMAP is responsible for directing transportation funding to a multitude of needs across the region. The amount of transportation funding that the Illiana tollroad would drain from operating and maintaining existing transportation facilities or building other, more needed, improvements is not a minor detail that can be ironed out later. To the contrary, it is CMAP's fundamental responsibility to identify the "committed, available, or reasonably available revenue sources" that could support the Illiana tollroad in order to determine whether it can be added as a "fiscally constrained" project. 23 C.F.R. § 450.104. Given the information presently available, CMAP cannot make that determination.

We understand that IDOT has informed CMAP that the Illiana tollroad must be included in the GO TO 2040 plan in order for the NEPA process for the tollroad to be completed. IDOT is omitting an important fact. In order for the NEPA process to be completed, IDOT must seek an amendment not only of the GO TO 2040 plan, but also of CMAP's TIP. *See FHWA, Transportation Planning Requirements and their Relationship to NEPA Process Completion* (Jan. 28, 2008), Question 1, available at [http://www.fhwa.dot.gov/planning/tpr\\_and\\_nepa/tprandnepa.cfm](http://www.fhwa.dot.gov/planning/tpr_and_nepa/tprandnepa.cfm). That TIP amendment would have to show "all phases (e.g., PE, final design, ROW, utility relocation, construction, and/or construction phases) of the project that are planned within the time frame" of the TIP. *Id.* IDOT has not yet sought such an amendment, which would have to reflect all of the construction activities that IDOT targets to begin in the spring of 2015. *See* <http://www.illianacorridor.org/P3/> ("IDOT and INDOT have established a target for construction to begin in the spring of 2015."). Given that amending the GO TO 2040 plan alone has no independent legal significance for the NEPA process, it is not clear why IDOT is so insistent that the amendment must be accomplished at CMAP's October meeting. We urge CMAP to reject

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<sup>1</sup> On the evening of August 28, 2013, two days before the close of the public comment period on IDOT's proposed amendment, IDOT posted online a new Illiana "fact sheet." *See* <http://www.illianacorridor.org/pdfs/illianakeyissuesfactsheet.pdf>. In that fact sheet, IDOT seemingly indicates that it will seek to amend the GO TO 2040 plan to not only add the Illiana tollroad, but also to cut significant funding from a priority project to improve I-55 from I-90/94 to Weber Road. Given that this amendment has not been formally proposed to CMAP, and IDOT has provided virtually no details, we cannot presently comment on it.

As we maintain in these comments, the Illiana tollroad, by itself, cannot be added to the GO TO 2040 plan consistent with the federal fiscal constraint requirement. That is the only plan amendment formally pending before CMAP, and it is the only amendment that has been noticed for public comment. If IDOT intends to seek a new amendment to the GO TO 2040 plan to not only add the Illiana tollroad, but also to significant funding on work for I-55, we contend strenuously that both a new CMAP staff analysis and a new public comment period are needed, following a formal request by IDOT.

IDOT's request, because IDOT has failed to demonstrate that the Illiana tollroad can be added to the GO TO 2040 plan as fiscally constrained.

### **III. The Proposed Project Undermines the Region's GO TO 2040 Sustainable Principles**

We are concerned that the underlying basis of IDOT population and employment forecasts contradicts the policy direction and core recommendations in the region's GO TO 2040 comprehensive plan. The IDOT socioeconomic forecasts would create a self-fulfilling prophecy of pushing growth into outlying, undeveloped areas, converting productive prime farmland and degrading a hub of globally rare natural areas, contrary to the GO TO 2040 plan's collaborative vision.

[GO TO 2040](#) reflects a collective strategy to live sustainably. The forecasts underlying its Preferred Regional Scenario reflect this vision, recognizing that the costs and benefits are not isolated to local communities, but are borne by all of us in the seven-county region. CMAP recognized that "the strength of our communities and economy is determined by issues that are highly related." See [CMAP GO TO 2040 Press Release](#) (Oct. 13, 2010). The principles and recommendations in the plan are the product of [numerous stakeholder meetings](#). From June to September 2009 alone, CMAP held 57 workshops, attended 15 community fairs and festivals, and had kiosks in 19 locations around the region. Several of these public events were held in Will County. As the CMAP Board Chairman and Mayor of Palos Hills [said on the day of its adoption](#), "...GO TO 2040 is the region's best chance to achieve prosperity that can be sustained for generations to come." As discussed below, IDOT's proposal of the Illiana tollroad challenges our region's forecasts and principles.

#### **A. IDOT's Use of its Own Radically Different Socioeconomic Forecasts in Planning the Illiana Usurps CMAP's Regional Planning Authority.**

Given the regional consensus supporting the GO TO 2040 Preferred Regional Scenario, we are concerned that the forecasts relied upon by IDOT reflect a radically different regional vision. CMAP staff highlights "substantive differences" in IDOT's intent and assumptions, which clearly conflict with the policies and goals of GO TO 2040. According to CMAP staff, "IDOT's socioeconomic forecasts assume a substantially different outcome for the region, placing more of the region's growth in outlying, undeveloped areas." CMAP Staff report, p. 6. This creates "considerable differences in the distribution and totals of socioeconomic indicators." GO TO 2040 forecasts reflect a sustainable future, centered around the infill of existing communities. By contrast, IDOT's forecasts are premised upon the determination that now-defunct historical trends of sprawl and blind consumption of resources will continue into this century as they did during much of the past sixty years.

It is important that CMAP supports its staff evaluation of the proposed tollroad using GO TO 2040 forecasts. By contrast, planning and evaluating transportation projects based on IDOT forecasts would create a self-fulfilling prophecy of pushing growth into outlying, undeveloped areas, converting productive farmland and degrading a hub of globally rare natural areas, contrary to the GO TO 2040 plan's collaborative vision.

The Illinois legislature vested CMAP, not IDOT, with the authority to create socioeconomic forecasts to serve as "the foundation for all planning in the region." 70 ILCS § 1707/44; 70 ILCS § 1707/51. IDOT's justification for refusing to consider the GO TO 2040 forecasts is still unclear. IDOT has claimed that CMAP's forecasts cannot be used for planning the Illiana tollroad because IDOT's are "market-based", whereas CMAP's are "policy-driven." Yet, all forecasts reflect policy judgments. IDOT's own argument

seems to suggest that it has the right to reforge the regional vision to fit its own project plans. Neither do IDOT's forecasts illustrate a "project level" analysis of the Illiana study area. Instead, IDOT's forecasts redistribute population all across the seven-county region.

IDOT also has implied that, because CMAP staff "concurred that IDOT's forecasting methodology was transparent and consistent with accepted practice," that CMAP agrees with its results. CMAP Staff Report at p. 8. This is untrue. CMAP staff articulated that "[t]he principles are clear that CMAP cannot concur with assumptions of any forecasts that do not conform to the policy direction of GO TO 2040." *Id.*

CMAP should support the use of its own GO TO 2040 socioeconomic forecasts and principles in its staff analysis, and adopt its staff conclusion that the transportation and economic benefits from the proposed tollroad are minimal to non-existent. This is especially true, since the benefits claimed by IDOT are premised upon a non-tolled facility, which IDOT has since rejected as an alternative. CMAP did not have the information available to determine how much less tolled traffic levels would be if riders were required to pay to use the road.

#### **B. The Illiana Tollroad is Not Consistent with GO TO 2040 Principles.**

As the first comprehensive regional plan since Daniel Burnham's in 1909, GO TO 2040 spans four themes: Livable Communities, Human Capital, Efficient Governance, and Regional Mobility. The plan coordinates investments in transportation infrastructure to carefully and deliberately focus the region's limited funds to largely maintain and modernize rather than expand its transportation system. CMAP stresses the need for the region to "unite around its transportation priorities, particularly regarding the construction of major capital projects recommended in GO TO 2040." *GO TO 2040*, p. 248. Its list of constrained projects is founded upon well defined criteria that allow for the most crucial improvements and projects to be completed first. *GO TO 2040*, p. 266.

As discussed above, IDOT deviated from this CMAP model, creating its own vision and priorities for where and how development will be dispersed throughout the region, failing to account for consequential damage to communities and significant natural resources. This is abundantly clear when viewing the Illiana tollroad project through the lens of the GO TO 2040 livability principles. According to CMAP:

The Regional Vision of GO TO 2040 describes a future environment in which 'open space' [is] preserved and enhanced,' the region consumes 'less energy and fewer natural resources,' treats 'water as a critical natural resource,' preserves 'the overall ecological health and diversity of the region,' and improves its residents' health through 'the availability of open space, transportation and recreation options, healthy food, clean water, and clean air. *GO TO 2040*, p. 45.

CMAP explained that:

Preserving open space can have positive impacts on water quality, biodiversity, and stormwater management, as well as providing an important asset that contributes to our economy and quality of life; preserving land for sustainable agriculture can have similar positive impacts. Similarly, development that is denser and focused in existing communities can reduce pressure to develop existing unprotected open space, and is

also more efficient in its use of energy and water than development on the region's fringe. Strategies with multiple benefits are most effective at meeting the many goals of GO TO 2040. *GO TO 2040*, p. 47.

We agree both with this premise and the recommended actions by CMAP to “preserve the most important natural areas in the region.” CMAP correctly foresaw that “coordinated investment in land protection and a commitment to the restoration and management of preserved lands will be necessary to achieve this.” *GO TO 2040*, p. 117.

The IDOT proposal contradicts these principles, turning a blind eye to the serious extent that the Illiana tollroad would contribute to the loss of important natural areas. This is most clear in its anemic and flawed analysis of impacts to the Prairie Parklands Macrosite, a Resource Protection Area in Will County near the western end of the proposed tollroad. *GO TO 2040*, p. 117. The vast amount of scientific and ecological evidence contributed by other agencies and stakeholders highlights these deficiencies, illustrating how the proposed Illiana tollroad directly undercuts livability policies, especially the underlying principles in the Green Infrastructure Vision that were adopted in GO TO 2040.

### C. The Illiana Tollroad would Undercut CMAP's Green Infrastructure Vision.

CMAP adopted the *Green Infrastructure Vision* (GIV) and its Sustainability Development Principles in GO TO 2040 to guide open space protection in the region, finding that they are consistent with the plan's policy recommendations. Chicago Wilderness, the author of the GIV, defined “Green Infrastructure” as an “interconnected network of land and water that supports biodiversity and provides habitat for diverse communities of native flora and fauna at the regional scale.” The GIV illustrates how to implement the Chicago Wilderness *Biodiversity Recovery Plan* at a macro level to protect, preserve and restore natural communities to long-term viability, “in order to enrich the quality of life of its citizens and to contribute to the preservation of global diversity.” *Biodiversity Recovery Plan*, p. 7.

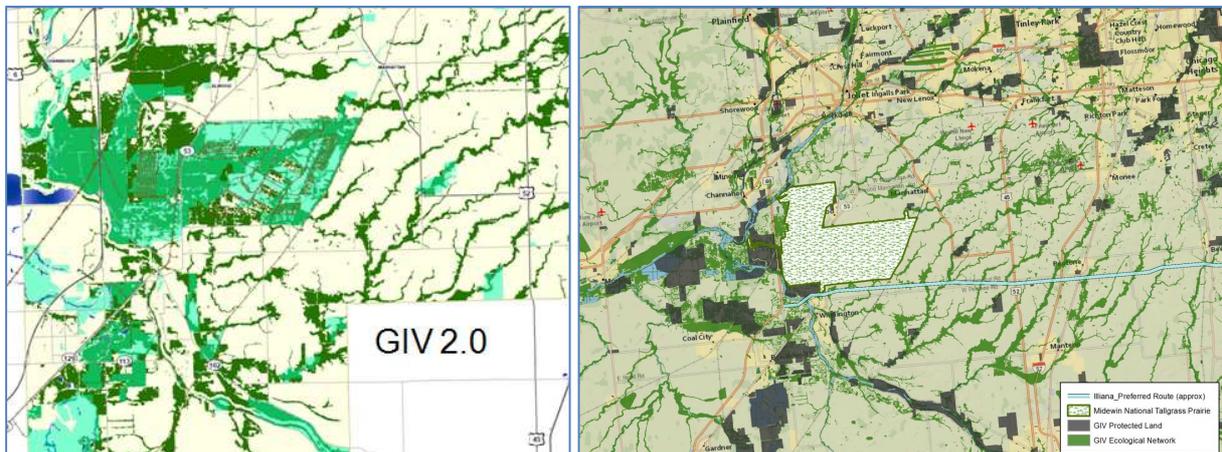
The GIV maps priority areas in the plan as recommended “Resource Protection Areas.” According to CMAP, Resource Protection Areas “indicate where it is most important to protect undeveloped land, restore degraded ecosystems through increased management, provide buffers for protected natural areas, and provide functional connections between protected natural areas.” *GO TO 2040*, p. 127. CMAP considers the “central purposes of protecting the green infrastructure network are to protect water resources and to preserve biodiversity within the region.” *GO TO 2040*, p.



135.

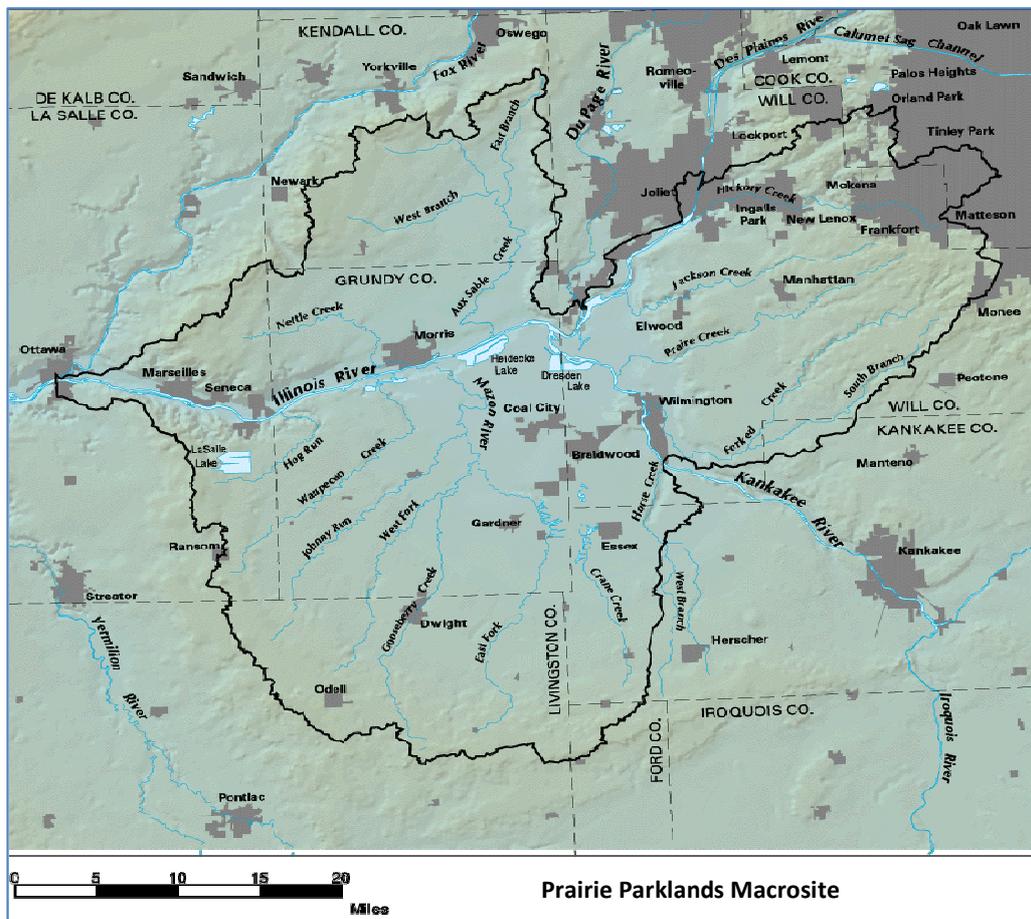
Biodiversity, the totality of species and ecosystems in our region, is the cornerstone of the region's environmental health. Natural communities provide ecological services in maintaining water quality, reducing flooding, pollinating crops, and controlling outbreaks of invasive pests. "Equally important, biodiversity contributes immeasurably to the quality of life for the citizens of the region and to the region's long term vitality." *Biodiversity Recovery Plan*, p. 6. As Daniel Burnham stated in the 1909 [Plan of Chicago](#), "the need for breathing spaces and recreation grounds is being forced upon the attention of practical men, who are learning to appreciate the fact that a city, in order to be a good labor market, must provide for the health and pleasure of the great body of workers." *Plan of Chicago* (1909), pp. 47-48.

As illustrated by the GIV 2.0 map, the proposed Illiana route cuts through a dense concentration of dozens of federally and state protected natural areas, referred to as the [Prairie Parklands Macrosite](#). This complex of high quality natural features is a prime example of priority open space that the GIV recommends to protect.



1. The GIV stresses protection of priority areas, especially remaining high quality sites.

The Illinois Department of Natural Resources (IDNR) designated the 239 square-mile core of the eight-county macrosite as an "Illinois Resource Rich Area." When IDNR [inventoried the Prairie Parklands' regional resources](#) a decade ago as part of its Critical Trends Assessment Program and Ecosystems Program, it referred to the Prairie Parklands as a "mix of outstanding natural wonders." The area's "prehistoric flora and fauna are world famous, and it is home to the Midewin National Tallgrass Prairie, America's first so designated." The study considered the Kankakee River to be one of the finest rivers in Illinois, based on its rich biodiversity, water quality, and outstanding fishing opportunities.

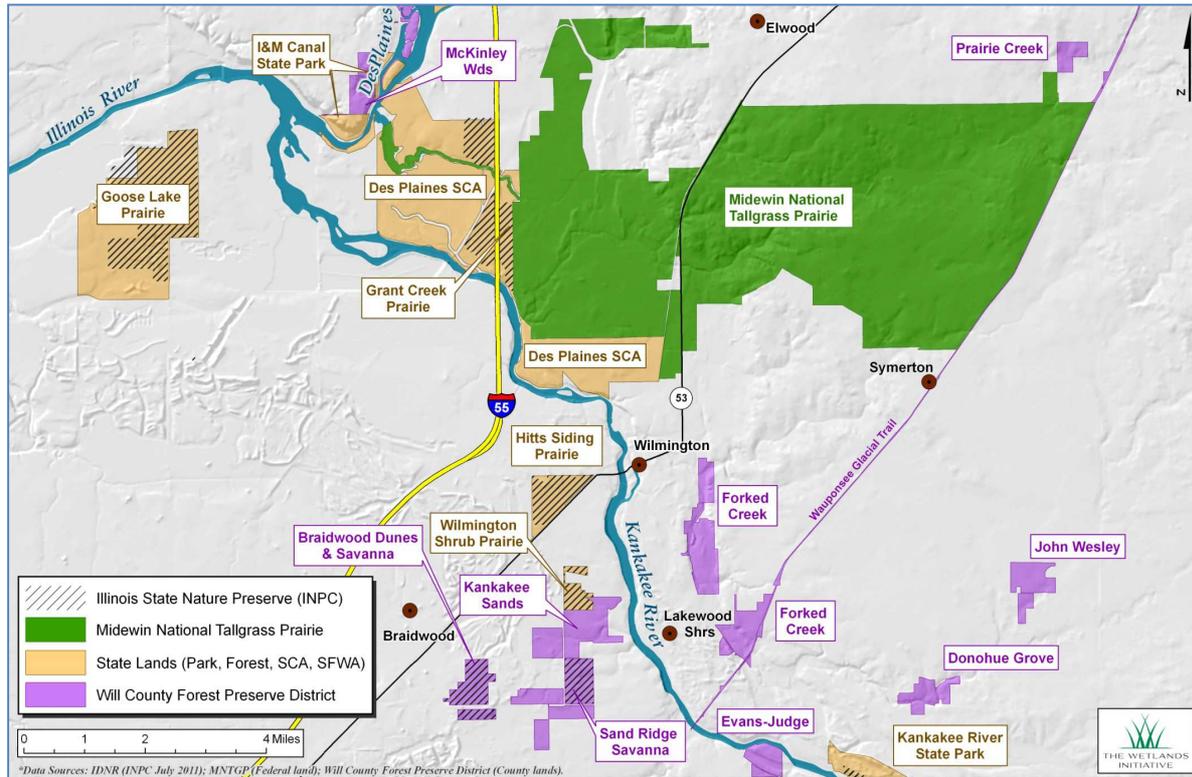


2. The GIV calls for protecting any large sites with some remnant communities.

The Prairie Parklands Macrosite, especially Midewin National Tallgrass Prairie and the Des Plaines Conservation Area, harbors the largest concentration of dolomite prairie in Illinois, one of the rarest prairie types in the world. The uncommonly vast prairies at Midewin are a few of the last reminiscent Illinois' pre-settlement landscapes.

3. The GIV recommends creating large preserves.

The [Midewin National Tallgrass Prairie](#), at the heart of the Prairie Parklands Macrosite, is the largest single preserve in the region, spanning almost 19,000 acres in Will County. The Des Plaines Conservation Area is a 5,000-acre state park that includes numerous types of high quality wildlife habitat. Its prairies, wetlands, woodlands and swamps harbor a broad diversity of plants and wildlife. Over 350,000 people visit this natural area each year. These two neighboring sites are interlinked with other high quality natural areas in the larger regional complex, including but not limited to prairies and high quality streams in the Joliet Training Area, Hitts Siding Prairie, Grant Creek Prairie, Goose Lake Prairie, Kankakee Sands, and the high quality Kankakee River, a designated Illinois Natural Areas Inventory Site.



4. The GIV recommends protecting land that connects or expands existing natural areas.

The Prairie Parklands Macrosite offers vital hydraulic and habitat connections for an uncommonly diverse number of species. Of the 59 mammals found in Illinois, 43 are likely in the natural complex, and of the State’s 309 bird species, 271 can be found in this area. Part of this macrosite is also within the Midwin-Des Plaines-Goose Lake Prairie Conservation Opportunity Area, which was identified in the Illinois Wildlife Action Plan as critical for conserving wildlife and habitat in Illinois.

The proposed Illiana Tollroad contradicts GO TO 2040 principles and the intent of the GIV and Biodiversity Recovery Plan in that it would cumulatively damage the epicenter of the Macrosite and the vital connections of these lands and waterways. Each impact from the road would not occur in a vacuum – they are inextricably linked. The rarity and dependency of the complex of Prairie Parklands requires the holistic approach under the GIV and GO TO 2040 to preserve and maintain this resource rich area.

For example, the health of the rich riparian corridor in the Des Plaines Conservation Area along the Kankakee River is directly tied to the quality of that high quality waterway. Yet, IDOT proposes to mitigate damage from building a 2,500-foot bridge over the Kankakee River by sinking the pylons into the adjacent riparian corridor, instead of placing them directly into the water. In addition to degrading the high quality river with polluted stormwater, excavating the shoreline of the river will harm species in the same ecological complex. The proposal by IDOT to mitigate these impacts with natural buffers is inadequate to counter the significant harm the bridge crossing will cause to the waterway and affected riparian corridor.

5. The proposed Illiana tollroad is inconsistent with GO TO 2040 principles in that it grossly deviates from the GIV and Biodiversity Recovery Plan.

Instead of adhering to these principles, IDOT turns a blind eye to adverse impacts, and promotes an unrealistic reliance on mitigation practices that will fail to protect these natural areas.

- (a) *The Proposed Illiana tollroad conflicts with GIV principles in that it would fail to protect and preserve regionally significant natural resources, including habitat for threatened and endangered species in the Midewin National Tallgrass Prairie.*

The proposed Illiana tollroad would cause direct, indirect and cumulative environmental impacts to [Midewin National Tallgrass Prairie](#). Midewin was established in 1996 as the first national tallgrass prairie in the country. Spanning almost 19,000 acres, it is the largest open space in the Chicago Metropolitan Area and northeastern Illinois. It was created to (1) conserve and enhance the native populations and habitats of fish, wildlife and plants; (2) provide opportunities for scientific, environmental, and land use education and research and (3) provide a variety of recreational opportunities.

As of 2005, Midewin hosted 348 native species of plants, 108 species of breeding birds, 40 aquatic species and 27 different types of mammals. It has at least 16 state-listed endangered and threatened species of plants and animals. Five other species found there are candidates for federal listing as endangered or threatened. Leafy prairie clover, a federally endangered plant, and hairy false mallow, a candidate for federal listing, are also present at Midewin. Its four streams and a variety of wetlands support 9 species of freshwater mussels and 23 species of amphibians and reptiles. Midewin will continue to grow as the Army transfers portions of the Joliet Training Area that are no longer in use.



The Congressional founders intended that Midewin remain an open and undisturbed landscape. They included legal restrictions in the [Illinois Land Conservation Act of 1995](#), which prohibit building any new highways, public roads, or portions of the Interstate system through or across any portion of this United States Forest Service area.

Midwin National Tallgrass Prairie provides rare and important habitat for many grassland bird species. The National Audubon Society recognizes it as an Important Bird Area. With less than 0.01 percent of the original 22 million acres of prairie remaining in Illinois, grassland birds are one of the fastest declining bird groups in the nation. Upland Sandpipers and Henslow's sparrows (both state endangered grassland birds) need hundreds of acres of habitat to support healthy breeding populations. These species, as well as bell's vireo, loggerhead shrikes, and bobolinks are known to forage and nest in the southern part of Midwin. In addition, wetlands in Midwin are home to least bittern, American bittern, king rail, yellow rail and a host of other species.



Henslow's sparrow

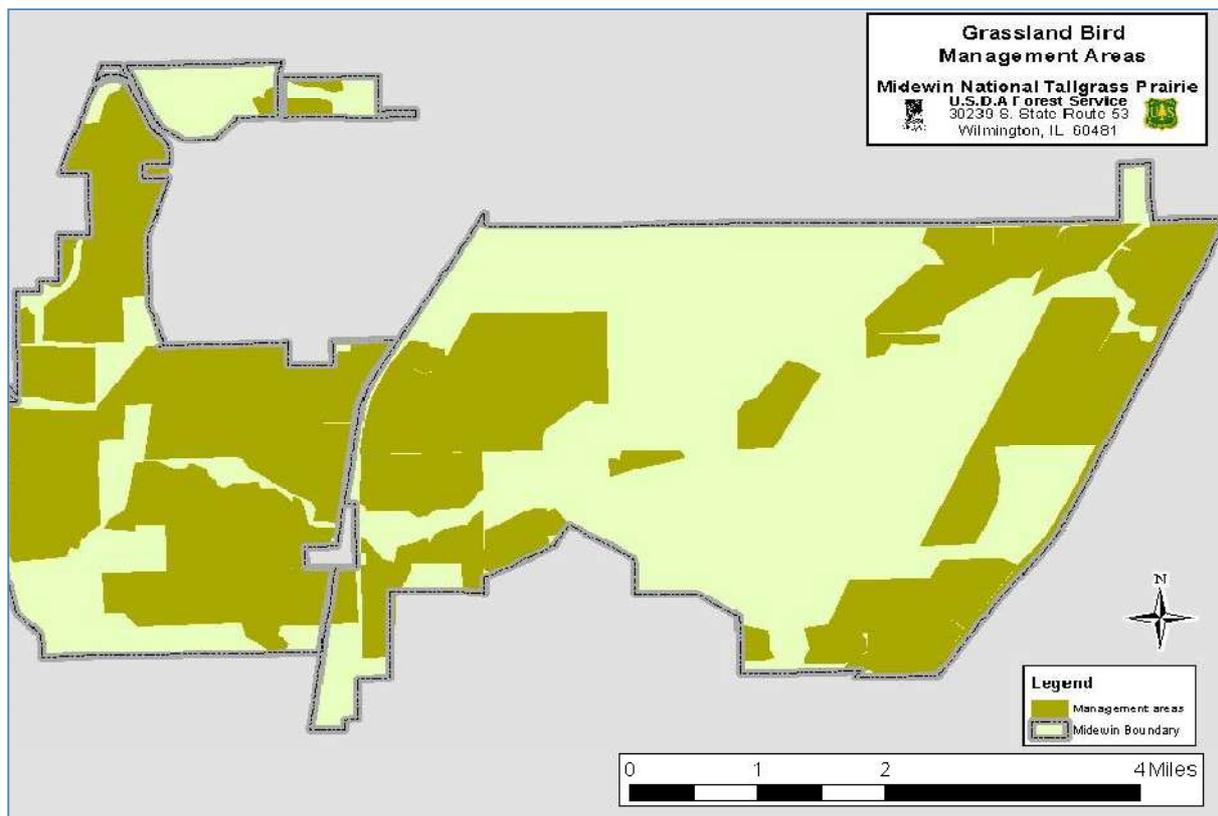


Bobolink



Bell's Vireo

Constructing Illiana south of Midwin will introduce intense noise, light, dust and pollution that will constrict and degrade viable habitat for the grassland birds. Midwin has partnered with numerous government, corporate and non-profit partners to accomplish millions of dollars of restoration work in



the U.S. Forest Service area's prairies and wetlands, to provide for these and other species, and the National Forest Foundation recently released a [shared vision](#) for restoring this regional open space

centerpiece over and beyond the next decade. If thousands of trucks are funneled daily onto Illinois 53 to connect with the Illiana tollroad, the intensified traffic through Midewin's "no noise bird management zone" would seriously compound the damage to the bird habitat, especially for upland sandpipers and loggerhead shrikes that have historically nested in fields near the road. [Studies](#) indicate that road noise and heavy use can impact nesting grassland bird populations. Birds either avoid areas near heavy use or are found in lower numbers. [One study](#) found that bird presence and breeding were reduced by 1,200 meters from a road with heavy traffic volume. Another study shows that birds can be negatively impacted by traffic noise up to 1.2 miles from the road. "The Ecological Effects of Roads on Wetlands," Wildlands CPR Volume 6, Cusic, Kinza (April 2001).

Birds communicate through auditory signals. If birds cannot discriminate between their own songs and background noise, it makes it more difficult for them to advertise locations of food and form pair bonds. [Id.](#) While avoiding sensitive breeding, nesting and migration periods for construction is crucial, it likely won't be enough to prevent use of the highway and arterial from limiting habitat for grassland species in the area.

The Illiana tollroad would render affected areas of Midewin incapable of serving one of the prairie's core purposes: habitat for grassland birds. While IDOT correctly concludes that grassland birds in the area would avoid the noise, light and air pollution from the roadway by abandoning their habitat, this hardly means that the consequence is not adverse. See IDOT Tier 1 Final Environmental Impact Statement, p. 4-435. To the contrary, making nesting grounds inhospitable for rare and protected grassland birds creates a serious impact, especially since Midewin has been preserved for the purpose of allowing these species the expanses they need to survive and nest. According to a recent study, compounded noise impacts could effectively reduce grassland bird habitat on the east side of Midewin by 52 percent. This would seriously diminish Midewin's intended value.

The United States Department of Interior, out of concern for grassland birds near the southern border of Midewin and along Route 53, commented that it was imperative that IDOT evaluate the specific sensitivities and needs of known grassland birds, and conduct noise studies to quantify the tollroad impacts. U.S. DOI DEIS Comment Letter, pp. 5-6. IDOT so far has refused to conduct noise studies along the length of Route 53, except at the southern-most point where it proposes a potential interchange, despite the warning by the United States Department of Interior that numerous potentially affected grassland and shrubland bird species were listed and needed special conservation attention. U.S. DOI DEIS Comment Letter, pp. 4-5.

In addition to creating significant problems for grassland birds, road lighting would affect other species. For example, night lighting along the highway would likely impact nocturnal animals and the life cycles of plants. Bat surveys at Midewin found fewer bats in the areas adjacent to Deer Run Industrial Park, which is never dark, resembling more of a bright twilight. In addition, harsh or prolonged disruption to the darkness can impact how plants manage their metabolism, flowering and development patterns. Deda, P., I. Elbertzhagen, M. Klusmann, "[Light Pollution and Impacts on Biodiversity, Species, and their Habitats](#)," [Secretariat of the Convention on the Conservation of Migratory Species of Wild Animals](#)" (2007).

The refusal by IDOT to adequately address impacts to wildlife habitat in Midewin and the surrounding Prairie Parklands Macro-site is contrary to the GO TO 2040 recommendation to protect large hubs of open space connected by wildlife migration corridors. CMAP highlights the importance of preserving

large blocks of habitat because “aside from habitat destruction itself, habitat fragmentation is one of the biggest threats to biodiversity in the region.” *GO TO 2040*, p. 120.

The proposed Illiana tollroad also would likely degrade wetlands within and connected to Midewin. Restoration and mitigation initiatives over the last decade have just begun to demonstrate the potential for this national tallgrass prairie. When you pave or grade over part of a wetland, it likely harms or destroys the remainder. In addition, the hydrology of wetland complexes are often linked so that damaging a water source that feeds one wetland can affect the complex well beyond that single wetland’s boundaries. Road deicing salt compounds in stormwater runoff that dissolves into water that feeds wetlands can damage or kill vegetation reliant upon this hydrology. Moreover, salt and petroleum compounds in stormwater runoff from the road can compound ill effects on plant life.

The Forest Preserve District of DuPage County found that, in wetlands studied near I-355, over half of the soil samples suffered from excessively high salt contents, restricting the types of plants that could live there. *Letter from Mr. Gooch, Executive Director, DuPage County Forest Preserve District, to Mr. Kos, District Engineer, Illinois Department of Transportation*, 5 (Feb. 28, 2001). IDOT itself has agreed that salt injury from splash and spray can cause drought symptoms, ranging from inhibited growth to premature plant death. See *Prairie*



“Scorch Leaf” from Salt Exposure

*Parkway DEIS*, 4-66 (2006). IDOT reported that while salt primarily lands within 150 feet of the roadway, salt spray - especially from trucks - can travel 328 to 1,640 feet from the road. This is largely consistent with findings in a [Morton Arboretum study](#) on how salt spray damages plants.

Since the proposed Illiana expressway runs along the entire length of the southern border of Midewin, it would likely degrade wetlands and other natural landscapes in this federal natural area, as well as within the neighboring Des Plaines State Conservation Area. Of particular concern, deicing salt could contaminate a known population of a state-listed plant, False foxglove (*Tomenthera auriculata*). Wildlife that depends upon these wetlands will likewise be impacted, especially since these wetlands are part of a larger complex that interacts with hydrology in Midewin.

According to the GIV, “many more relatively small wetland complexes are needed throughout the region, but particularly in the southern and western parts to connect existing wetlands .... Wetlands, particularly those fed by groundwater, require protection of their recharge areas as well as protection of their plants.” *Biodiversity Recovery Plan*, p. 60. The plan calls for preserving and expanding wetland types for wildlife habitat and the sake of other ecologically important functions. The Illiana tollroad would directly cut against this goal. The road would almost certainly pollute water that feeds wetland complexes and decrease vital circulation by disrupting hydrological conditions, which in turn can cause eutrophication, plant loss, and other damage to nearby wetlands.

Despite the extensive harm caused by the Illiana tollroad project, IDOT fails to adequately address or comport with the *GO TO 2040* regional vision to “treat water as a critical resource and preserve the overall ecological health and diversity of the region.” *GO TO 2040*, p. 45. Impacts from the proposed project directly conflict with the GIV and Biodiversity Recovery Plan objectives adopted in *GO TO 2040* to: protect globally and regionally significant natural communities and restore natural communities to ecological health. *Biodiversity Recovery Plan*, p. 7.

(b) *The Proposed Illiana tollroad threatens federally and state-listed threatened and endangered species in the project area.*

The proposed Illiana tollroad will likely take viable habitat for threatened and endangered species in the project area. These impacts run contrary to GO TO 2040 recommendations to preserve the region’s ecological health and biodiversity (GO TO 2040, p. 45), and the GIV objective to “manage natural communities to sustain native biodiversity (Biodiversity Recovery Plan, p. 7).

Habitat exists for federally listed eastern prairie fringe orchids within or near the Illiana tollroad corridor, west of the Kankakee River. The snuffbox mussel and sheepnose mussel, both federally listed species, may also be within range of the proposed tollroad. The Illinois Natural Heritage Database (Ecological Compliance Assessment Tool) lists a host of Illinois-listed species potentially in the project area: Black sandshell, Blanding’s turtle, Ear-leafed false foxglove, Eryngium Stem Borer, Franklin’s Ground Squirrel, Grass pink orchid, Loggerhead shrike, Ornate box turtle, Pallid shiner, Purple wartyback, River redhorse, Salamander mussel, Sheepnose mussel, Slippershell mussel, Spike mussel, Tubercled orchid, Upland sandpiper and Western sand darter.



While reports indicate several of these species may exist in or near the corridor, IDOT has not yet provided results from promised surveys to determine the true extent of probable takings. The only general information available in the DEIS restricts the scope of IDOT review to impacts known within the corridor, rather than evaluating all foreseeable impacts to federally and state listed species, as required by law.

(c) *The Proposed tollroad severs community connections with regionally significant natural and cultural resources.*

One of the primary goals of GO TO 2040 is to create livable communities. The plan promotes GIV principles to “foster a sustainable relationship between society and nature in the region and enrich the quality of lives of the region’s citizens. Biodiversity Recovery Plan, pp. 7-8.

**D. The Illiana Tollroad Would Destroy Valuable Farmland.**

The GO TO 2040 plan considers agricultural preservation as “one of the purposes of the GIV and land protection in general.” According to CMAP, farmland protection has its own merits and preserves more environmental benefits than most alternative uses. GO TO 2040, p. 130. Similar to preserving open space, preserving land for sustainable agriculture contributes to our economy and quality of life. GO TO 2040, p. 47

IDOT has not shown how diverting growth away from higher densely populated areas into ones planned for agricultural uses will benefit these rural communities and the value they add to our state. Arguing that the limited access tollroad could help farmers move their goods to market, IDOT downplays the significant damage the road would cause, including the lost heritage farms, severed local routes that agri-businesses need to move equipment, and the loss of rich farmland to grow the commodities for both our region and the world.



Constructing the Illiana tollroad would ruin, sever and diminish over 2,600 acres of highly productive farmland. Well over half the acreage qualifies as prime farmland and soils of statewide importance. This figure excludes farmland lost to induced sprawl in rural communities, such as Willmington and Symerton. In addition to relocating numerous farmsteads that have been worked by the same families for generations, IDOT has failed to recognize a number of centennial farms and places of historic significance in the path of the proposed tollroad that qualify for protection.

In sum, the Illiana tollroad would move regional land use policies in the wrong direction. The GO TO 2040 plan is premised upon encouraging the infill of developed communities and preserving natural spaces and productive farmland for future generations. These policies are a direct reaction to the destructive trends of sprawl that characterized the second half of the last century. The GO TO 2040 plan rejected this “business as usual” mindset and created a Preferred Regional Scenario that, as discussed above, points the way to a new regional vision. We ask CMAP to uphold the GO TO 2040 principles and reject the Illiana tollroad amendment request.

**E. The Proposed Illiana Tollroad Threatens the Sustainable Supply of Clean Water in Direct Conflict with GO TO 2040 Water Resource Protection Policies.**

In addition to helping the region compete economically with other global centers, GO TO 2040 promotes improved livability for its environmental benefits, such as “less degradation of streams and wetlands, reduced water and energy consumption ... and an improved quality of life.” *GO TO 2040*, p. 7. The GOTO 2040 plan addresses protecting and restoring our waterways in both its adopted GIV principles and objectives, and its focus on reducing the flooding and natural resource damage from increased impervious surface.

The Green Infrastructure Network embedded in GO TO 2040 understandably follows the region’s waterway corridors to protect the land along streams and invest in the protection of waterways themselves. *GO TO 2040*, p. 127. Rivers and creeks, and the riparian areas along their banks, are notoriously cradles of healthy natural communities, harboring and supporting a vast number of plants and wildlife. Through the GIV, CMAP values the quality our waterways and the diversity of species they harbor, treating “water as a critical natural resource.”

The Illiana tollroad controverts this policy in that it will degrade several high quality waterways in our region, threatening rare and intolerant aquatic life and diminishing their habitat. Polluting the streams

that flow by and through our federal and state natural areas will also minimize opportunities for people to connect and enjoy these beautiful places.

1. *The proposed Illiana tollroad would seriously degrade the high quality Kankakee sub-watershed, regardless of any attempts by IDOT to mitigate the damage.*

The proposed Illiana tollroad would cross streams 22 times in the Kankakee sub-watershed. IDNR has rated many of the streams near the proposed 6-lane road as “high quality.” The stream crossings would have devastating direct and cumulative impacts on water quality and resident aquatic life species. This severe damage is contrary to GO TO 2040’s GIV objective to protect high quality streams and lakes to conserve aquatic diversity. Given the massive scale of the project, and cumulative draw of development into the surrounding rural areas, IDOT could not mitigate enough to conserve the streams’ aquatic diversity. We strongly recommend that CMAP find the proposed tollroad to be inconsistent with this policy, especially in light of the Biodiversity Recovery Plan’s emphasis on maintaining the quality of high quality streams so they can support native, rare and threatened species. *Biodiversity Recovery Plan*, p. 11.

- a. The proposed road would degrade the Kankakee River.

At its western terminus, IDOT proposes to stretch a 2,500-foot bridge over the Kankakee River, just 300 feet from where it is [listed](#) as a state-protected Category III [Illinois Natural Areas Inventory](#) site. The river is a “Land and Water Reserve” that harbors state-listed threatened and endangered species. Approximately 5,500 feet of its stream length would fall within the Illiana corridor. This segment has the highest species diversity out of all of the streams in the study area, with an Index of Biological Integrity (IBI) of 53 out of 60. See TIER 1 DEIS, 3-189. IDNR found 36 species of fish and 25 mussel species near the project area. Both the Kankakee River and a segment of Forked Creek near the Kankakee River confluence have the highest “A” ratings for stream quality. Several of the fish species collected are intolerant of pollution. Tier 1 DEIS, 3-196. IDNR collected river redhorse, a state-threatened species, from two Kankakee River sites in July 2010. Tier 1 DEIS, 3-196. Two state endangered species – the western sand darter and pallid shiner – have been mapped within the Illiana corridor. Tier 1 DEIS, p. 3-196, citing Illinois Natural History Survey, 2011; GIS database, 2012. Since these species are highly sensitive to pollution, it is very likely that building a major highway over their habitat will release sufficient stormwater runoff, salt, spray and sediment to degrade their environment beyond their tolerance level.



Kankakee River near Warner Bridge Road. Photo by Prairie Rivers Network

Exceedingly rare mussel species that live in these waterways, including ones on the state and federal threatened and endangered lists, would also perish if the proposed tollroad polluted their habitat.

According to the U.S. Fish and Wildlife Service, “[m]ussels respond to changes in water quality. They are especially vulnerable to sedimentation, which can result from construction and stormwater runoff that lands in the river.” Since pollutant loading is so likely to have a detrimental effect, this in and of itself is cause to rethink whether the bridge crossing at this location is viable.

IDOT also briefly mentioned that the Illiana tollway could disturb a special waste site 330 feet north of the Illiana corridor (near I-55 and IL-129 in Wilmington), which could contaminate groundwater that feeds into the Kankakee River. The DEIS warns that “[c]ontaminated soils or groundwater could potentially be encountered during demolition, construction or earthwork; resulting in the release of contamination into the air, soil, or water...” Tier 1 DEIS, 3-271. If construction releases a plume of hazardous waste, this could seriously degrade habitat and kill aquatic life in this stretch of the Kankakee River, and poison a drinking water source for surrounding communities.

b. The proposed tollway would also degrade creeks and tributaries in the project area.

The proposed tollroad would cross Forked Creek and its tributaries eleven times. Forked Creek drains into the Kankakee River near Wilmington, Illinois. See [Fish Community Surveys of the Forked Creek Watershed](#), IDNR, Rung & Pescitelli (2006), p. 3. “From the confluence of the mainstem at South Branch to the Kankakee River, Forked Creek exhibit[s] extensive areas of exposed bedrock, containing diverse habitat features such as pools and riffles, with abundant cobble, boulders, woody debris, and emergent plant colonies of water willow...” *Id.* at 3-4. Overall, Forked Creek has “a high number of darter species... which generally indicates the presence of diverse habitat and good water quality.” *Id.* at 2. The stream has “a diverse assemblage of species, including many considered to be intolerant of degraded conditions, such as habitat alteration ... and siltation.” *Id.* at 6.



**Forked Creek**

Forked Creek has a very high IBI score - 52 out of a potential 60 - qualifying as a unique aquatic resource, near where the tollroad would cross the creek. IDNR recorded two Chicago Wilderness species of concern at that location: the rainbow darter and largescale stoner fish, which have limited distribution in Northeastern Illinois.

The Illiana tollway would cross Jordan Creek near the southern border of Midewin. The creek, which flows through the federal natural area, has good habitat diversity and integrity for the region, with large colonies of water stargrass and abundant boulders and cobble. The stretch serves as a nursery for smallmouth bass, a pollutant intolerant species, and harbors three kinds of intolerant darters.



**Trim Creek**

The Illiana tollway would bridge over Trim Creek near Illinois-1 in Will County, spanning 4,426 feet of the length of

the waterway. The crossing is upstream of a stretch rated as a Biologically Significant Stream. IDNR has found ironcolor shiners in the creek, which are a state-listed threatened species.

2. *The proposed Illiana tollroad would result in increased impervious surface that will escalate flooding problems and degraded water quality in this part of the region.*

The GO TO 2040 plan focuses on limiting or reducing impervious surface to temper the stormwater damage to both natural and built communities.

Because of its broad floodplains and typically clayey soils, northeastern Illinois is flood prone. The increased runoff from impervious areas like roofs, streets, and parking lots compared to farm fields or woodlands means that flooding will be worse, since more rainfall will be converted to runoff. As a result, one of the most significant water resource problems in the region is flooding. Many areas — especially the watersheds of the Des Plaines and Little Calumet Rivers, but others as well — are threatened by flooding, which is exacerbated by historic development within floodplains and lack of detention storage (see Figure 16). Extensive expenditures have been made on flood control projects, but flooding problems remain, creating great hardships for residents and businesses. *GOTO 2040*, p. 88.

The plan considers the percentage of impervious surface in communities to be a regional indicator of the potential impact of development on water resources. Stormwater runoff from development that encroaches upon rural areas degrades streams and wetlands, increasing pollutants and emissions from travel across a more dispersed development pattern. *GO TO 2040*, p. 65. Road salt and other pollutants cause serious water quality impacts, compounding cumulative damage from increased impervious surface resulting from induced development in low density areas.

Impervious surfaces are parts of the landscape, like streets or roofs, [which] cause runoff rather than allowing rainfall to infiltrate. The amount of imperviousness in a watershed is strongly and negatively linked to the biological health of streams and lakes. A distinction can be drawn between impervious areas that drain to surface waters (such as most conventionally designed urban streets) and those that do not (such as roof downspouts running out into a lawn). Impervious areas that drain to surface waters are associated with increased runoff volumes and water quality declines in streams. *GO TO 2040*, p. 86.

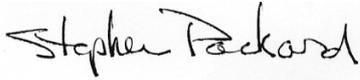
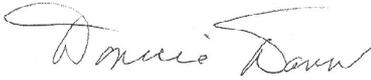
Protecting watersheds is a key priority in the GIV and GO TO 2040 plan. Adding the Illiana tollroad to GO TO 2040 would increase impervious surfaces in 23 watersheds beyond the targeted 10% threshold designed to protect the health of our water resources. CMAP staff suggests that IDOT and local communities could mitigate impervious cover with stormwater best management practices, such as road side swales. Even with these practices, drainage will still be an issue along natural areas, such as Midewin and the Des Plaines Conservation Area. On the one hand, conventional pipes can deprive high quality wetlands, like ones in the adjacent federal and state natural areas, of groundwater that is essential to sustain their ecosystem health. On the other, installing vegetative sinks to infiltrate polluted stormwater can funnel salt, metals and other soluble contaminants into the groundwater that feeds these natural communities. Plants – even salt tolerant invasive species like Teasel, only remove a fraction of deicing salts at best. The remaining concentration accumulates in the soil and salinates groundwater, causing the same kind of damage as salt splash and spray from vehicles on the road.

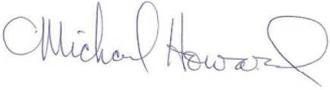
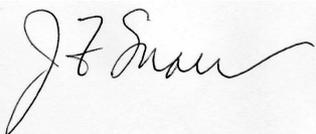
In addition, local communities have not adopted adequate stormwater safeguards in the project area to require green infrastructure practices on the scale necessary to reduce enough impervious surface to deflect direct and cumulative impacts of the road. Since the county and affected communities have not adopted volume control requirements in their stormwater management ordinances, it is unlikely that they will increase the use of these practices to the extent needed on a voluntary basis.

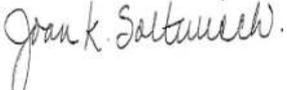
#### **IV. Conclusion.**

The Illiana tollroad is inconsistent with our region's GO TO 2040 plan. IDOT has failed to demonstrate how the tollroad can be added to the plan as "fiscally constrained." Despite its potentially significant negative impacts on public transportation spending, the project would yield minimal or no transportation or economic benefits. Moreover, the costs imposed by the tollroad would be more than fiscal. We would lose irreplaceable natural resources, as well as the principles that so many of us agreed to in the GO TO 2040 plan.

For all of the above reasons, the undersigned organizations urge CMAP and the MPO Policy Committee to deny the IDOT request to add the Illiana tollroad project to the GO TO 2040 plan and regional TIP.

<b>AUDUBON SOCIETY, CHICAGO REGION</b>	<b>BIRD CONSERVATION NETWORK</b>
 Stephen Packard Director <b>National Audubon Society</b> <b>Chicago Region</b> 1718 Sherman Avenue, #210 Evanston, Illinois 60201 847.328.1250	 Donald R. Dann Advocacy Chair <b>Bird Conservation Network</b> 1879 N. Burling Chicago, Illinois 60614 312.305.1001
<b>CENTER FOR NEIGHBORHOOD TECHNOLOGY</b>	<b>CHICAGO AUDUBON SOCIETY</b>
 Jacky Grimshaw Vice President of Transportation Policy <b>Center for Neighborhood Technology</b> 2125 W. North Avenue Chicago, Illinois 60647 773-269-4033	Roger Shamley President <b>Chicago Audubon Society</b> 5801-C N. Pulaski Chicago, IL 60646-6057 (773) 539-6793
<b>CITIZENS AGAINST RUINING THE ENVIRONMENT</b>	<b>ENVIRONMENTAL LAW AND POLICY CENTER</b>
 Ellen Rendulich Citizens Against Ruining the Environment PO Box 536 Lockport, IL 60441 <a href="mailto:carelockport@usa.com">carelockport@usa.com</a> 815.834.1611	 Andrew Armstrong Staff Attorney <b>Environmental Law and Policy Center</b> 35 East Wacker Drive, Suite 1600 Chicago, IL 60601 <a href="mailto:aarmstrong@elpc.org">aarmstrong@elpc.org</a> 312.751.3738

<p><b>FULLER PARK COMMUNITY DEVELOPMENT</b></p>	<p><b>ILLINOIS AUDUBON SOCIETY</b></p>
 <p>Michael Howard President <b>Fuller Park Community Development</b> 331 W. 45th Street Chicago, Illinois 60609 <a href="mailto:fpcd@fullerpark.com">fpcd@fullerpark.com</a> 773.624.8686</p>	 <p>Tom Clay Executive Director <b>Illinois Audubon Society</b> P.O. Box 2547 Springfield, Illinois 62708 Phone: 217.544.2473 Fax: 217.544.7433</p>
<p><b>ILLINOIS PADDLING COUNCIL</b></p>	<p><b>ILLINOIS DIVISION OF THE IZAAK WALTON LEAGUE OF AMERICA</b></p>
 <p>Jack Snarr President <b>Illinois Paddling Council</b> 2138 Clinton Street Rockford, Illinois 61103 847.869.4606 <a href="mailto:i-snarr@northwestern.edu">i-snarr@northwestern.edu</a></p>	<p>Bob Shepherd President <b>Illinois Division of the Izaak Walton League of America</b> 16 Juliet Avenue Romeoville, Illinois 60446 <a href="mailto:Shepsharp1@comcast.net">Shepsharp1@comcast.net</a></p>
<p><b>INDIANA CHAPTER OF IZAAK WALTON LEAGUE OF AMERICA</b></p>	<p><b>MIDWIN HERITAGE ASSOCIATION</b></p>
 <p>Timothy R. Russell President <b>Indiana Chapter Izaak Walton League of America</b> 6735 Nebraska Ave. Hammond, IN 46323 <a href="mailto:Mothy3@aol.com">Mothy3@aol.com</a></p>	 <p>Lorin Schab President <b>Midwin Heritage Association</b> P.O. Box 54 Wilmington, Illinois 60481 <a href="mailto:lschab44@yahoo.com">lschab44@yahoo.com</a> 815.423.2149</p>

<p><b>MIDWIN TALLGRASS PRAIRIE ALLIANCE</b></p>	<p><b>OPENLANDS</b></p>
 <p>Gerald Heinrich President <b>Midwin Tallgrass Prairie Alliance</b> 1770 S. Vista Drive Wilmington, Illinois 60481 <a href="mailto:g.heinrich@sbcglobal.net">g.heinrich@sbcglobal.net</a></p>	 <p>Gerald W. Adelman President &amp; CEO <b>Openlands</b> 25 East Washington, Suite 1650 Chicago, Illinois 60602 <a href="mailto:jadelmann@openlands.org">jadelmann@openlands.org</a> 312.863.6262</p>
<p><b>PRAIRIE RIVERS NETWORK</b></p>	<p><b>PRAIRIE PARKLANDS ECOSYSTEM PARTNERSHIP</b></p>
 <p>Glynnis Collins Executive Director <b>Prairie Rivers Network</b> 1902 Fox Drive, Suite G Champaign, Illinois 61820 <a href="mailto:gcollins@prairierivers.org">gcollins@prairierivers.org</a> 217.344.2371</p>	 <p>Joan K. Soltwisch President <b>Prairie Parklands Ecosystem Partnership</b> 16191 Hare Road Minooka Illinois, 60447 <a href="mailto:jksoltwischblue@yahoo.com">jksoltwischblue@yahoo.com</a> 815.690.3658</p>
<p><b>SIERRA CLUB, ILLINOIS CHAPTER</b></p>	<p><b>THE NATURE CONSERVANCY</b></p>
 <p>Cindy Skrukud Clean Water Advocate <b>Sierra Club, Illinois Chapter</b> 70 East Lake Street, Suite 1500 Chicago, Illinois 60601 <a href="mailto:Cindy.skrukud@sierraclub.org">Cindy.skrukud@sierraclub.org</a> 312.251.1680</p>	 <p>Robert K. Moseley Director of Conservation <b>The Nature Conservancy, Illinois</b> 8 South Michigan, Suite 900 Chicago, Illinois 60603 <a href="mailto:rmoseley@tnc.org">rmoseley@tnc.org</a> 309.636.3330</p>

**THE WETLANDS INITIATIVE**



Paul Botts  
Executive Director  
**The Wetlands Initiative**  
53 West Jackson, Suite 1015  
Chicago, Illinois 60604  
[pbotts@wetlands-initiative.org](mailto:pbotts@wetlands-initiative.org)  
312.922.0777 x 112

## Follow the Numbers: Why We Oppose the Inclusion of the Illiana Expressway in GO TO 2040

August 30, 2013

The Illinois Dept. of Transportation (IDOT) has requested that the Chicago Metropolitan Agency for Planning (CMAP) amend the Chicago region's GO TO 2040 comprehensive plan to include the proposed Illiana Expressway as a fiscally constrained project, a prerequisite to receive federal funding. The Metropolitan Planning Council (MPC) appreciates the open process CMAP has established and IDOT has facilitated during the Illiana Expressway review period, one of the most transparent to date.

As an independent, nonpartisan organization committed to solving problems and improving the Chicago region for all residents and businesses, MPC strongly advocates for carefully considered public investments that solve today's challenges—including traffic congestion, job access and economic recovery—and put us on a path to a sustainable future. To assess whether a specific investment is achieving both immediate and long-term regional goals, MPC embraces the use of performance measures to evaluate environmental, economic and equity impacts, to determine how governments should allocate limited resources. MPC analyzed the Illiana project by asking three threshold questions to justify the roughly \$1.3 billion IDOT has estimated it will cost to build the Illiana Expressway:

1. Is the Illiana a sound use of public dollars?
2. Does the Illiana provide useful new transportation infrastructure?
3. Will the Illiana create new jobs and sustainable regional growth?

A robust analysis by MPC ultimately has determined that the Illiana Expressway would yield few benefits in exchange for high—and uncertain—costs. MPC opposes the Illiana Expressway's inclusion in GO TO 2040, in its current state, for the following reasons:

### 1. Financing for the Illiana Expressway is uncertain and would put other regional projects prioritized by GO TO 2040 at risk.

- a. **Significant taxpayer costs:** Though the Illiana is proposed as a public-private partnership (P3) with tolls, it is not evident that private funds will cover all capital and long-term maintenance costs. One analysis reveals private funds backed by tolls would support less than one-third of the \$1.35 billion capital costs, not to mention future maintenance. Tolls are estimates to generate only \$440 million over 30 years. A likely P3 scenario would leverage an availability payment, through which a private company agrees to finance capital costs in exchange for guaranteed payments from the public sector over a defined period. This model puts the public sector at risk; if collected toll revenues fall below expectations, the government must find a way to pay the financing company its guaranteed annual payment.

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Edward J. Wehmer

Wintrust Financial  
Corporation

The public sector will likely need to provide more than two-thirds of Illinois' share of the capital costs of the Illiana, in addition to revenues produced by tolls. GO TO 2040 projects a total of \$10.5 billion through 2040 for our region's major capital projects, funding that is entirely directed toward six projects prioritized by CMAP as part of the regional plan: the extension of the CTA Red Line to 130<sup>th</sup> Street; IL 53/Central Lake County Corridor; West Loop Transportation Center; I-294/I-57 Interchange; Elgin-O'Hare Expressway and West O'Hare Bypass; and Circle Interchange.

Adding the Illiana to the regional plan may require reassigning public funds already committed to these capital projects or cutting planned maintenance and operations funding for existing transportation infrastructure. If not, it would mean prioritizing the Illiana to be funded in place of other major projects that have been documented as delivering significant regional benefits. Either way, the Illiana's high cost requires harmful tradeoffs.

- b. **Uncertain toll revenues:** Similar rural toll roads recently built in other U.S. regions, as shown in the following table, have suffered from lower-than-expected revenues and several have gone bankrupt. Some of these cautionary tales are particularly notable because they are on the fringes of well-developed urban areas and were financed on the assumption that they would yield significant economic growth, as is the case with the Illiana. The federal government's TIFIA loan program financed several of these roads, lending not only dollars but a vote of confidence that they were reasonable investments. Yet, in many cases, road use fell far below forecasts, causing revenues to lag and roads to go bankrupt, leaving the public on the hook.

IDOT's Illiana analysis does not account for declining national vehicle miles traveled (VMT), increasing fuel price, slowing growth in Will County or shifting global trade patterns that may result from the expansion of the Panama Canal, among other projects. These variables could produce lower-than-expected traffic on the Illiana.

<b>Project</b>	<b>Location</b>	<b>Cost, length</b>	<b>Completion Year</b>	<b>Result</b>
<i>San Joaquin Hills toll road</i>	Orange County, Cali.	\$800M, 16 miles	1996	Agency asked its creditors to reduce its coverage ratio and annual debt service ratios; use is only 43% of projections
<i>Inter-County Connector</i>	Maryland	\$2.4B (\$516M TIFIA loan), 18 miles	2011	Road use about one-third of initial expectations, though in line with revised projections
<i>South Bay Expressway</i>	San Diego	\$658M (\$140M TIFIA loan), 9.2 miles	2007	Operator filed for Chapter 11 bankruptcy (\$73M in unsecured TIFIA loan, will not recapture full loan)
<i>SH 130</i>	Austin, Tex.	\$1.33B (\$430M TIFIA loan), 41 miles	2012	Half of projected traffic; owner saw credit rating downgraded by Moody's (2013)
<i>Pocahontas Parkway</i>	Richmond, Va.	\$597M (\$150M TIFIA loan), 8.8 miles	2002	Initial owner (nonprofit state entity) could not service debt; later, road turned over to consortium of banks when earnings didn't cover debt costs
<i>Dulles Greenway</i>	Loudoun, Va.	14 miles	1995	Traffic below forecasts, peaked in 2005; owner records road as net liability; bond ratings reduced (2013)
<i>Camino Colombia</i>	Laredo, Tex.	\$90M, 22 miles (1 lane per direction)	2000	Filed for bankruptcy (2003) after being unable to service its debt. Truck traffic was far below projections
<i>Southern Connector</i>	Greenville, S.C.	\$200.1M (tax-free bonds), 16 miles	2001	Debt downgraded; filed for bankruptcy (2010) after use was less than half of projections

- c. **Cost estimate is low:** IDOT has not provided a detailed cost estimate for the Illiana, citing “the need for confidentiality” until a private contractor is selected for the project. IDOT’s projected cost to construct the 47 new miles of this four-lane, bi-state roadway is \$1.35 billion—or \$8.1 million per lane-mile in 2020 dollars—of which the Illinois share (based on distance) would be at least \$950 million.

Though IDOT argues that the Illiana could be constructed at costs similar to those of a recent Indiana highway project, CMAP found that IDOT’s estimated per lane-mile cost for the Illiana is lower than costs for similar projects nationwide, and that the Illiana could be 11% to 358% more expensive than IDOT’s initial estimates.

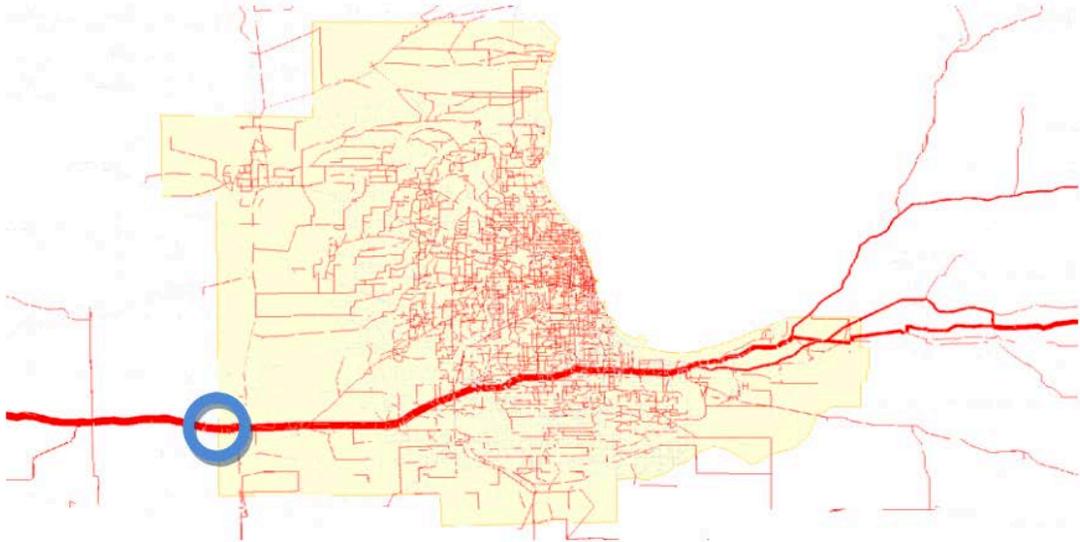
IDOT’s figure also excludes some \$1.5 billion in highway road upgrades in adjacent areas, which are assumed in the state’s studies of how the Illiana will affect traffic congestion and economic growth, but which are not included in GO TO 2040. These nearby improvements would bring the total cost to at least \$2.75 billion.

## 2. The Illiana fails to address the region’s transportation needs.

- a. **Low usage:** Because the road would run through a lightly populated area and would be tolled, IDOT estimates that the road would see only 8,800 to 26,300 vehicles per day—fewer than many arterial roads such as Irving Park Road in Chicago at 35,400 vehicles per day or Cermak Road in Cicero at 33,900 per day, and far fewer than major highways like I-80, which carries upwards of 180,000 vehicles per day.
- b. **Does not reduce congestion:** IDOT forecasts find that the Illiana would do little to relieve congestion, reducing vehicle hours of travel in the South Sub-region—defined as the areas south of I-80—by just 1.08 percent and reducing regional truck hours by less than 1.0 percent. CMAP’s model finds I-80 would experience no major improvement in congestion due to the Illiana’s construction.
- c. **Does not solve freight congestion:** The Illiana’s construction will not result in time savings for most truck drivers coming through the region. The Illiana Transportation System Performance (TSP) report analyzed the movement of trucks entering the region and documented that trucks coming from the west (notably on I-80) “are traveling through the study area to locations in Michigan and Ohio” (pg. 105). The following map (from pg. 106 of the TSP) illustrates the paths of trucks (in red) coming from an origin point on I-80 (blue circle). This map illustrates that the vast majority of trucks entering the region from the west either terminate in Chicago and its suburbs north of I-80 or east of the region in Michigan and Ohio. Very little of the traffic moves southeast into Indiana. This makes sense

because traffic moving from the west to Indianapolis and nearby destinations can travel via I-74 and avoid Chicago-area congestion altogether.

**Figure 5-9. Select Link Analysis: I-80/94 Multi-Unit Trucks**  
*Without Illiana*



**3. The Illiana would do little to improve the region's economic health and would not help the region grow sustainably.**

- a. **Imperceptible increase in GRP:** IDOT predicts that the new road would increase the region's gross product by just 0.2 percent, while CMAP estimates a scant 0.05 percent increase in GRP.
- b. **Very few permanent jobs:** IDOT estimates the road would add a maximum of 940 permanent jobs to the region, a 0.02 percent increase at a cost of at least \$1.4 million per job.
- c. **Shifts jobs and population around the NE Illinois/NW Indiana region:** IDOT's data show that the project would result in a net outflow of jobs and population from Illinois into Indiana. With the Illiana, the CMAP region is projected to lose more than 7,000 people and 5,000 jobs compared to baseline (no road) estimates. The South Suburban areas of Cook County would lose jobs and population, as would the City of Chicago and most other municipalities in Illinois. At the same time, Indiana would see a roughly equivalent increase in jobs and population. In other words, the major effect of the road would be a shifting in locations of residences and employment—all at a high cost.

- d. **Increases pollution:** The project will encourage car use, not transit ridership, and result in a net increase in vehicular carbon emissions according to CMAP.

Because the current plan for the Illiana does not demonstrate significant transportation or economic benefits in exchange for high and uncertain costs, the Metropolitan Planning Council is opposed to its inclusion in GO TO 2040.

Sincerely,

A handwritten signature in black ink that reads "MarySue Barrett". The signature is written in a cursive style with a large, looping initial "M".

MarySue Barrett  
President



## *Midewin Heritage Association*

*PO Box 54, Wilmington, Illinois 60481 <> MidewinHeritage.Org*

August 28, 2013

CMAP

Attn: Plan Amendments  
233 S. Wacker Drive  
Suite 800  
Chicago, IL 60606

Ladies and Gentlemen:

We implore you not to amend the award winning GO TO 2040 comprehensive plan to include the proposed Illiana Expressway. We find little in the proposed project which supports the four themes within that comprehensive plan. Although the Illiana planners say that the concept for the road was part of Daniel Burnham's 1909 Plan for Chicago, and admit that the idea has been around for decades, it apparently never came to the fore until a few years ago due to the need "to create jobs and economic development....sustaining quality of life in the study area", per the April 2013 IllianaNews.

Certainly the proposal does not increase livability within the B3 corridor, particularly for those who will lose their homes to a 47-mile ribbon of concrete, or for those residents near the tollway who will have to live with the noise and air pollution generated by that roadway. In the Illiana planner's Historic Properties Report they ostensibly discounted the importance of local historical sites and cemeteries still being visited by my family members. How does that improve the quality of life for those living in those communities? How does the removal of thousands of acres of agricultural land from production promote sustainable local food and generate economic activity?

The Illiana planners contend that that the Illiana project has compatibility with community master plans. Yet, of the communities effected by the proposed tollway, most do not have a current comprehensive plan which addresses the impacts the Illiana would surely have on their community. Greenhouse gas emissions generated by transportation continue to rise. A four-lane highway primarily servicing freight trucks will only add to that problem.

The proposal will increase dramatically the acreage of impervious surfaces, effecting water run-off rates and lessening ground water recharging. The proximity of the proposed expressway to a number of open spaces, including the Des Plaines Conservation Area and Midewin National Tallgrass Prairie, will prevent any expansion of those entities and will clearly not improve them. There is no question that the tollway will impact on wildlife at Midewin. This is counter to the Land and Water Conservation Act of 1995 which established Midewin and said that "land and water resources would be managed in a manner to conserve and enhance the native populations and habitats of fish, wildlife and plants." Thousands upon thousands of volunteer hours have been provided in support of that process. Should their efforts go for naught?

The concept apparently driving the Illiana is, "build it and they will come". Is the thought that people will move to the area near the proposed Illiana and build a new home because they can get onto a tollway, and drive to a job? Expanding development brings along with it a tremendous need for new infrastructure to service those areas. New housing brings the need for new schools, yet today our state can barely support the schools that already exist. Will building the Illiana help the state fully fund their commitment to education, or will the burden fall heavily on the local tax payers.

Initially the term "freeway" was used by the Illiana planners to describe the proposed Illiana. It was not until recently that they conceded that this road would be anything but a "free" way or ride. Clearly the \$1.25 billion project, excluding money already spent on planning and future land purchases, is beyond the state's means. The Illinois Tollway Authority has declined to take on the project. Projections on usage were originally based on the road being a freeway and concluded that 60% of the traffic would be trucks. As a tollway, what would be the volume of traffic and the percentage of trucks? The financial needs of construction, maintenance and profit for a private entity will obviously drive the tolling rate. Even then a governmental subsidy in some fashion might be needed, particularly if tolling revenues do not meet projections. Are MAP-21 funds being considered in funding this project? Would that take away from funding for other transit projects within the 7-county planning area. What if any performance targets, would the Illiana help our region achieve?

Finally, how does the Illiana as currently planned address regional mobility? As a tollway well to the south of the region's heavier populations and the main east-west artery (I-80) passing through the area, use of the tollway by the general public can be expected to be extremely low. In the April 2013 IllianaNews it was reported that "The Illiana is expected to reduce the vehicle miles on arterial roads in the study area by 26 million miles annually". In the June 2013 issue of the IllianaNews it was stated that "the Illiana project would yield..... 46 million fewer annual truck miles traveled on local arterials". How did this additional 20 million mile reduction on local arterials come about between the two newsletters? This really brings into

question the reliability of the Illiana planners' data. At the same time they have admitted that some arterials such as Route 53, going past the Abraham Lincoln National Cemetery and through Midewin National Tallgrass Prairie, will see a substantial increase in traffic due to the Illiana. The planners approach to this problem appears to be mitigation rather than resolution.

We strongly believe that the Illiana Expressway project does not advance the goals within CMAP's regional comprehensive plan and should not be added to the GO TO 2040 plan as a constrained priority project.

Sincerely,

Lorin Schab  
President, Midewin Heritage Association



File Code: 1950  
Date: SEP -3 2013

Chicago Metropolitan Agency for Planning  
Plan and TIP Amendments  
233 S. Wacker Dr., Suite 800  
Chicago, IL 60606

To whom it my concern:

I am writing on behalf of the Midewin National Tallgrass Prairie to express our concerns over the inclusion of the proposed Illiana Expressway as a fiscally constrained major capital project under the GO TO 2040 comprehensive regional plan. I want you to know that a transportation facility is needed to address the points outlined in the Illiana Expressway purpose and need, however I do not support the inclusion of Illiana B3 proposal into CMAP'S GO TO 2040 Plan as it is currently being proposed by IDOT.

My staff and I have been regular attendees to the barrage of meetings and public hearings that have taken place concerning this project over the past two years now. Even before that Midewin and CMAP collaborated on an Alternative Transportation Study to help us determine how best to get the large volume of potential visitors in the Chicago area to Midewin for a safe, enjoyable experience. This high-speed, multi-lane expressway at Midewin's southern border does not fit into any of the scenarios presented in that study.

Midewin is fortunate to have the protection of two pieces of federal legislation as related to new roadway projects. The first is the Illinois Land Conservation Act of 1995 (Public Law 104-10; 110 Stat 594; section 2915(a)) expressly prohibits new construction of any through road. "Prohibition Against the Construction of New Through Roads. - No new construction of any highway, public road, or any part of an interstate system, whether Federal, State, or local shall be permitted through or across any portions of the Midewin National Tallgrass Prairie." The second is Section 4(f) of the Transportation Act of 1966. The Act states that attempting to locate a highway on protected 4(f) property requires substantial evidence as stated in the Act to prove that using a 4(f) protected property is the only viable option available to complete the project. Without the protection above, the proposed corridor would be across Midewin, as it was in a very early concept. Even in its current location the proposed B3 corridor, due to its close proximity to Midewin, encroaches on the "intent" of the federal act, which is to protect natural conservation areas like Midewin.

We have voiced our position that any transportation facility in the vicinity of Midewin will have detrimental effects on bird and other types of sensitive habitat, which we are attempting to, preserve and re-create at Midewin. Our studies have indicated that the placement of a roadway within the B3 corridor will significantly decrease Midewin's "core-area" where grassland birds and nocturnal species find it most conducive to nest and thrive. These types of cumulative effects are currently being studied as part of the Tier 2 process, but the decision to select the B3 corridor was based, in part, on its lower area of environmental impacts caused directly by the footprint of the proposed facility. Once the full extents of the cumulative effects are identified I am confident that the B3 corridor will have greater negative effects to habitat than presented in the Tier 1 decision.

We have also attempted relay to the Illiana team that Midewin's connection to the surrounding communities is vital to the socio-economic success of both the communities and Midewin. In its current form the B3 corridor cuts between Midewin and the communities of Symerton and Wilmington. Having this multi-lane barrier between us limits opportunities for access between established businesses in the



communities and the natural area available at Midewin. This limited access could result in fewer long term jobs that are focused on the Great Outdoor Experience and utilize Midewin as their destination.

Transportation projects are currently planned all around Midewin. The Illiana Expressway, the South Suburban Airport, and High-Speed rail expansion on the Union Pacific are all well into their own independent planning, when they should be working together. The Illiana has no provisions for access to the airport, and IDOT and Union Pacific are proposing new bridges over the Kankakee River within a quarter mile of one another. There needs to be assurance that all projects are coordinated with one another, fulfill the regional needs, while at the same time balance short and long term job creation, local community lifestyles and identities, future growth, conservation, and agriculture.

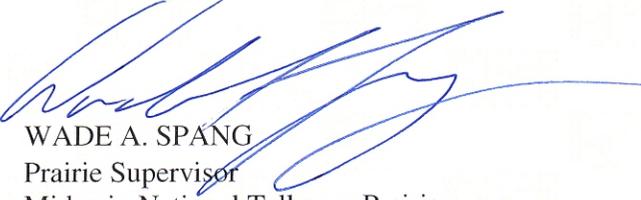
I am not as well versed on the fiscal aspects of the project, but I can offer these comments. All of the projected calculations for traffic on the Illiana assumed completion of the 33 miles of added expressway lanes to I-80 and I-55 as stated on page 4 of your July 30, 2013 report. If these projects are not included in GO TO 2040 as needed for the Illiana, then the costs are not telling the full story. On the other hand, if these lane expansions are not on your regional plan, then there should be a pause in adding new projects to GO TO 2040 without fully discussing and disclosing how the inter-dependencies between projects and their scheduled completions can affect the type of transportation modeling used to justify the Illiana.

With regards to the cost per mile discussion, please consider the following. I agree that IDOT's cost estimates are low, partly I believe, because they are proposing a highway that is designed to fit the mostly rural footprint that exists now. Where is the forward thinking to build a transportation facility that will be viable well into its service life? The additional cost for items such as additional sound suppression at natural areas like Midewin or along the Kankakee River, or purchasing additional right of way for a parallel recreational trail along the Illiana corridor do not fit into IDOT's decision framework for this project. This is where CMAP can interject and assure that the regional needs of the public are met by this project, and that the associated higher costs required to meet those needs are included as well.

In closing I will repeat that a transportation facility is needed to address the points of the Illiana Expressway purpose and need, but the B3 corridor is not the answer. This facility was planned in a very narrow planning box which resulted in a straight line across the middle of the planning area. A better solution can be found. As an example, at a very early planning meeting my staff proposed a route that connected to I-355 near New Lenox, made a "Y" somewhere outside of Manhattan, one leg went east to I-65, with the other leg connecting to I-55 south of Wilmington. This route better fits the ring of transportation that already flows around Chicago and Lake Michigan. I do not believe this route, or other potentially viable routes were given proper consideration before the B3 corridor was selected.

I have given you my reasons for not recommending inclusion of the Illiana Expressway in your Go To 2040 regional plan as it is currently proposed. If you have any questions, please do not hesitate to contact Robert Hommes, Prairie Engineer, or myself at 815-423-6370.

Sincerely,



WADE A. SPANG  
Prairie Supervisor  
Midewin National Tallgrass Prairie

# MIDWIN TALLGRASS PRAIRIE ALLIANCE

P.O. Box 2026 | Joliet, Illinois 60434  
www.fs.fed.us/mntp/mtpa.htm



Date: August 28,2013

From: Jerry Heinrich , President Midewin Tallgrass Prairie Alliance

To: CMAP

Re: Public Comment - Proposed Amendment to GO TO 2040 - Illiana Corridor

As President and representative of the \*Midewin Tallgrass Prairie Alliance, I submit for your review and consideration the following comments and questions concerning IDOT's request that CMAP consider inclusion of the proposed Illiana Expressway as a fiscally constrained major capital project in the GO TO 2040 comprehensive regional plan.

## **Comment(s) and Question(s):**

1. IDOT engineers have provided that the Illiana Expressway will: *1) improve accessibility to one of the largest intermodal freight and port areas in the country, and 2) reduce the strain of truck traffic on local roads, improving safety, cutting commuting times and reducing congestion.*

**Comment:** Contrary to what IDOT has expressed, If the Illiana Expressway is built, intermodal truck traffic congestion on Illinois Route 53 will get worse, severely impacting Midewin National Tallgrass Prairie, Abraham Lincoln National Cemetery, Historic Route 66, and the small communities of Elwood, Manhattan, Symerton and Wilmington. As proposed, thousands of intermodal trucks generated daily from the massive CenterPoint Intermodal complex and associated warehouses would be funneled onto Route 53 en route to the proposed Illiana Expressway. To make matters worse, intermodal truck traffic traveling on peripheral local east-west roads would also be funneled onto Route 53 – through the heart of Midewin and within a stone's-throw of Midewin's Welcome Center and planned Environmental Learning Center and bison viewing area. The 70 to 80 decibel noise generated by passing intermodal trucks would impact grassland bird nesting areas, wildlife, and, importantly, Midewin visitors. Imagine standing on the edge of the Grand Canyon or waiting for Yellowstone's Old Faithful to erupt, only to see and hear an unending procession of howling trucks passing immediately behind you. Please consider that Midewin is a roadless area and that existing and planned visitor access points, including parking lots, trailheads, visitor and interpretive centers, and a bison viewing area, are or will be immediately adjacent to Route 53 and other existing highways.

The complex of intermodal facilities being built along the I-55 and Route 53 corridor is immense and growing. To build the nation's largest intermodal complex on the back of an existing 1950's road system is unacceptable. As Daniel Burnham stated, "make no little plans." We need to be looking at the bigger picture. We need a comprehensive regional traffic management plan that truly addresses both safety and congestion on local roads – a plan that addresses the issue of how to move intermodal truck traffic while doing the least harm. Route 53, River Road, South Arsenal Road, Wilmington-Peotone Road, etc. were never designed to safely handle the daily burden of thousands of intermodal trucks traveling at high-speed.

Consider that Route 53 is a four-lane "country road" – not a limited access highway. While long-haul trucks would be trying to go faster and faster en route to an Illiana interchange at or near Route 53, slower traffic associated with Abraham Lincoln National Cemetery, Midewin National Tallgrass Prairie, Historic Route 66, Chicagoland Raceway, Des Plaines Conservation Area, local communities, local businesses, and residences will be trying to exit and/or access Route 53 at numerous locations – locations without the benefit of turn-lanes and/or traffic lights.

2. *IDOT engineers have provided that the Illiana Expressway will serve as a backbone for local planning for other land use needs.*

**Comment:** As noted in CMAP's own 19-page staff report, local municipalities such as Wilmington, Elwood, Symerton, and Manhattan are generally without local plans on how to deal with the Illiana and associated truck traffic. These heavily impacted communities seem to be in competition with one another and unable to work toward a common plan that might be of benefit to all. To make matters worse, Will County, as a regional planning agency, has shown little to no leadership toward helping local communities develop a greater, regional traffic management plan. The Midewin Alliance firmly believes that funneling intermodal truck traffic onto local roads such as Route 53 is not a solution, but rather a problem. Also consider that impacted entities such as the US Forest Service Midewin National Tallgrass Prairie and the Abraham Lincoln National Cemetery have no official capacity to develop a "local traffic plan" that might help reduce and/or mitigate the impact of intermodal traffic.

3. On page 3, paragraph 3 of the referenced CMAP Memorandum dated July 30, it is provided that *"In general, the plan strongly recommends a focus on maintenance and modernization of the existing system."* Additionally, on Page 4 within the section titled *Other Highway Expansion Costs*, it is provided that *"The Tier One EIS also assumes approximately 33 miles of nearby expressway will add lanes to accompany the Illiana. These are I-80 from I-355 to Minooka and I-55 from I-80 to Braidwood. Neither of these two projects is included in GO TO 2040."* Also, ... *"At that time, CMAP estimated the total cost for reconstruction and adding a lane to both these facilities to be \$1.5 billion, in 2009 dollars."*

**Comment / Question:** Is construction of the Illiana contingent upon build-out (added lanes) of I-55 and I-80? Is there an established construction timeline for doing so? Should the Illiana be allowed to move forward if there is no existing plan and/or funding for build-out of I-55 and I-80? If improvements are made to I-55 and I-80, shouldn't the affect of these improvements be reflected in any modeling used to project Illiana usage

and/or Illiana toll revenue as might affect Illiana's financial viability? Shouldn't the improvements to I-55 and I-80 take precedence over the construction of the Illiana?

4. On page 15, paragraph 3 of the referenced CMAP memorandum, it is provided that *"The Tier 1 EIS compared the expected impacts of alternative corridors for the Illiana at the corridor level using standard GIS techniques. The Tier 2 EIS is expected to investigate many of these impacts at a finer level of detail with field surveys and the benefit of additional information about facility design. The purpose of CMAP's analysis is not to reexamine these impacts, but to analyze the project relative to the regional indicators identified in GO TO 2040"*

**Comment / Question:** Many issues and factors concerning the Illiana were either not addressed in the Tier 1 study and/or were deferred to Tier 2. How can an assessment concerning the viability of the proposed Illiana be determined if, for example, it has not even been determined whether or not the Illiana will be a toll road?

**In conclusion -**

The Midewin Alliance firmly believes that the proposed B3 Illiana Expressway should not be included as a fiscally constrained major capital project under the GO TO 2040 comprehensive regional plan, and, importantly, we look forward to any opportunities that might allow us to work with CMAP in finding a regional solution to managing intermodal truck traffic.

Sincerely,

Jerry Heinrich, President

[g.heinrich@sbcglobal.net](mailto:g.heinrich@sbcglobal.net)

815-476-6171

\* The Midewin Tallgrass Prairie Alliance is a 501(c)(3) not-for-profit organization that serves as an advocate and Friend of the USFS Midewin National Tallgrass Prairie. As an organization, we support ongoing prairie restoration activities and we serve to support the thousands of volunteers that have contributed 10s of thousands of volunteer hours since Midewin's creation in 1996.

September 3, 2013

Randy Blankenhorn, Executive Director  
Chicago Metropolitan Agency for Planning – (CMAP)  
233 South Wacker Drive  
Suite 800  
Chicago, IL 60606

On behalf of 'No Illiana 4 US'- the Grassroots Bi-State Group strongly opposed to the proposed Illiana Tollroad P3 project, I would like to submit this cover letter for public record along with the enclosed 3 separate sets of notarized petitions signed by registered voters from the states of Illinois and Indiana. The legal sized 'No Build Petition that includes No Build Alternatives alone has a total of 2760 signatures with more copies being turned in daily.

After reading the CMAP analysis of the Illiana proposal we object strongly to this plan for multiple reasons:

1. At a meeting with IDOT & the Will County Farm Bureau on 12-12-12 when asked how much it was going to cost to build the proposed Illiana the number quoted that evening was \$26.7 Billion dollars. At every subsequent public meeting IDOT/INDOT/ILLIANA has stated that the project would cost \$1.6 billion dollars. When we question during the comment section of their meetings what happened to the \$26.7 billion dollar estimate they have blatantly denied ever stating the more realistic amount of \$26.7 billion to build the proposed roadway. Thus supporting CMAP's concern in the analysis that the numbers are grossly underestimated.
2. The Illiana would remove an estimated 2600 acres of prime productive farmland from the food chain annually. The average yield of corn/acre in Will County, Illinois is 178 bushels/acre. In food terms this correlates to 6764 boxes of cornflakes/acre, or 71,200 cans of soda sweetened/acre or 445 gallons of ethanol/acre. So ANNUALLY by removing 2600 acres of farmland from the food chain the Illiana would remove – 17,586,400 boxes of cornflakes from the shelf EVERY YEAR. This would be a HUGE impact .
3. The Illiana blatantly goes against the GOTO 2040 plan to preserve the existing GREENSPACE, and Agricultural land and limit Urban Sprawl. Since the Illiana would destroy an estimated 2600 acres of prime farmland and encourage Urban Sprawl and development from the current areas. Thus, destroying the rural communities of Wilmington, Symerton, Wilton Center, Peotone, & Beecher, Illinois along with Lowell & Cedar Lake, Indiana.
4. If the Illiana Tollroad is built on existing prime productive farmland it would have the same effect as the Chernobyl Nuclear Disaster as it would POISON the land FOREVER and NOTHING could ever be grown on it again.
5. The Illiana Tollroad would also erect a 'Berlin Wall' from I-55 to I-65, severing and destroying the communities in its path. IDOT/INDOT claims it would make it easier for the farmers to bring their crops to market when in reality it would have the complete opposite effect due to the multiple road closures and deadend roadways the Illiana would create. This would make what was once a simple route from the field to the elevator EXTREMELY MORE DIFFICULT, adding not only time but also fuel & aggravation to fieldwork in the path of the Illiana.
6. The Illiana would also DESTROY the RICH HERITAGE of the area. Since the Farmers whom work the land have and continue to instill the art & lessons of being good stewards of our land to produce crops, livestock & food for their families, our country and our world for multiple generations past and many more future generations to come. This way of life and hard work

has been passed on from generation to generation for over 175 years. The Illiana would forever change this by destroying not only 2600 acres of valuable farmland but also at least 1/3 of the over 75 Centennial Farms in Will County, IL. These farmers have poured their blood, sweat and tears into this rich land to reap the rewards & disappointments of their hard work at harvest time.

7. IDOT/INDOT claim that the proposed Illiana will only effect 25 homeowners. This is ANOTHER number that has been GROSSLY UNDER REPORTED. Since according to the Will County Farm Bureau approximately 300 farms will be effected in Illinois alone with at least 1/3 of the Centennial Farms in the county being destroyed.
8. The detrimental effects that the run-off will have on the Kankakee River Watershed would be devastating. With the pollution entering fields, field tiles, streams, wells and ultimately the river.
9. The effects on wildlife in the path including multiple endangered species both land and water along with severing the Wapoosee/Glacial Migratory / Bike path.
10. The disgraceful unacceptable effect the Illiana would have on the Abraham Lincoln National Cemetary which houses our Veterans Final Rest Place and facilitates 15-30 funerals per day.

As you can see the list is endless why CMAP , CANNOT include the proposed Illiana Tollroad on its well thought AND planned GOTO 2040 plan, since the Illiana would destroy the VISION & COUNTLESS HOURS that went into creating the ACCEPTABLE GOTO 2040 Plan. Since CMAP & numerous Conservation Groups and Municipalities worked countless hours to devise a plan that protected what Green Space & Agricultural Land we have left. FOOD REALLY COMES FROM THE FARM NOT THE SHELF.

Thank You for your time in considering our comments & signatures from registered voters from Illinois and Indiana.

Sincerely,

Virginia Gates-Hamann

No Illiana 4 US / Dairy & Grain Farmers

**From:** [CMAP Web Support](#)  
**To:** [Info](#)  
**Subject:** Contact CMAP  
**Date:** Tuesday, September 03, 2013 1:01:04 PM

---

\* Full Name : George Ochsenfeld  
\* Address : 28020 S. Crawford  
\* City : Monee  
\* State : Illinois  
\* Zip Code : 60449

Business Phone :

Home Phone :

\* Email Address : [ochsenfeld@aol.com](mailto:ochsenfeld@aol.com)

Comments/Question : I oppose the proposed Illiana expressway. As President of STAND (Shut This Airport Nightmare Down), I have watched IDOT's dishonest planning efforts for 20 years. The Al-Chalabi Group provided planning data for the MidAmerica airport, which IDOT strongly pushed, saying it would create 24,000 jobs, but it sat virtually empty for 14 years. Al-Chalabi also provided inflated numbers for the proposed Peotone airport, and now, it's my understanding, they are involved in planning for the Illiana. Al-Chalabi involvement should be a red flag indicating that IDOT is again up to dishonest planning and invalidate IDOT's case for the Illiana.

Additionally, the Illiana expressway would be an engine of sprawl, destroy irreplaceable farmland, disrupt the environment, and displace farm families.

I urge CMAP to say "no" to the Illiana by not including it in CMAP's planning efforts.

Sincerely,

George Ochsenfeld  
Crawford, Monee, Il. 60449  
7319

28020 S.  
(708)534-  
[ochsenfeld@aol.com](mailto:ochsenfeld@aol.com)

Memo to:

Via: FAX, August 29, 2012

Steve Schilke  
C/o Kesti Susinskas  
Illinois Department of Transportation  
Region One/District 1  
201 W. Center Court  
Schaumburg, IL 60196

Dear Mr. Schilke:

We are now amending the count on our petition sent to you via priority mail on August 22, 2012 for the additional signatures we obtained on the NO BUILD petition in Illinois. The count should now read: Indiana contains 518 signatures and our Illinois petition now contains 380 (up 91) signatures. Copy of original letter sent to Steve Schilke c/o Kesti Susinskas is contained herein for reference.

Thank you,

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

Donna Silikas  
16731 White Oak Ave.  
Lowell, IN 46356

August 22, 2012

Steve Schilke  
c/o Kesti Susinskas  
Illinois Department of Transportation  
Region One/District 1  
201 W. Center Court  
Schaumburg, IL 60196

Dear Mr. Schilke:

I represent a group of concerned property owners who reside mostly in the proposed Indiana-side of the B3 corridor, but also represent the B4 corridor and A3S2 proposed corridors. The name of our group is STOPIT (State Taxpayers Opposing the Proposed Illiana Toll Road).

Our group strongly opposes any of the 3 proposed Illiana corridors that may pass through West Creek, Cedar Creek, or Eagle Creek Townships. Therefore, we support a "NO BUILD" option for Indiana.

The reasons we support a "NO BUILD" for Indiana are finance-related, ownership-related, environmental-related, and study-related. However, one of the main reasons is that there are not enough positive incentives on the Indiana-side to justify uprooting people from their homes and property. It is glaringly obvious that Indiana-portion of the Illiana will merely serve as a bypass to Illinois' proposed and existing business facilities. Simply stated, "a bypass does NOT promote economic growth".

Environmentally, this bypass will bring noise, air and light pollution to an area that is treasured for its beauty and tranquility. Farmland, natural areas, and wildlife habitat will be paved over and lost forever.

Also, township tax revenues, property values, local businesses, north/south traffic flow, and truck traffic on Route 41 and other free routes will all be negatively impacted if this bypass is built. The community will be forced to find ways to replace lost tax revenues, subsidize road repairs on free routes, and support already financially-strapped emergency services. Including the environmental issues already mentioned, we feel this bypass, which comes at a high cost, offers little benefit to our community.

With the recent passing of the P3 (public-private partnerships) law in both Indiana and Illinois, Eminent Domain has become a dangerous abuse of power for a select few, which allows private homes and property to be sold for private gain. Most certainly the Illiana will be privatized, to be controlled by a convergence of politicians, investment bankers, lobbyists, and rich entrepreneurs. Profits accrued will be allocated to a handful of private investors (mostly foreign) rather than the people of Indiana or Illinois.

For all the reasons stated in this letter, and because of other questionable \*study-related issues, we are submitting two “NO BUILD” petitions to be placed on Public Record. One petition is for Indiana and contains 518 signatures. The other petition is for Illinois and contains 289 signatures.

Thank you for the professional courtesy extended in your review and consideration of the issues offered in this letter.

Respectfully yours,

**STOPIT** Committee Members

Enclosures: Indiana Petition, Illinois Petition, and Illiana Financial, Ownership, Environmental, and Study-Related Issues (FOES) document.

\*NOTE: Study-Related Issue: “NIRPC comments contradict Illiana findings”, NWI Times, August 14, 2012.

\*NOTE: Study-Related Issue: Alternatives Evaluation Report – Illiana Corridor Study, July, 2012, Page 45, “Based on this sensitivity test, factors were developed and applied to the non-tolled travel performance evaluation criteria to reflect the implementation of tolling.”

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000

August 30, 2013

Chicago Metropolitan Agency for Planning  
ATTN: Plan and TIP Amendments  
233 S. Wacker Dr., Suite 800  
Chicago, IL 60606

RE: Illiana Tollway Conflicts with Chicago Wilderness Green  
Infrastructure Plan

Dear Chicago Metropolitan Agency for Planning (CMAP) Board and Staff:

The Nature Conservancy in Illinois does not recommend the inclusion of the proposed Illiana Tollway to the GO TO 2040 Plan. CMAP data suggest that the Illinois Department of Transportation (IDOT) cost estimates for the road are substantially lower than other similar major capital projects across the nation. IDOT hasn't adequately demonstrated how tolls could generate enough revenue to cover the \$1 billion plus cost of the road, unless excessive. If the Tollway does not generate targeted revenues, it's likely that taxpayer dollars will be needed to cover the costs of the project.

The analysis CMAP staff did for their objective report revealed the road is inconsistent with the Plan's call for investing in existing communities and modernizing our current transportation and infrastructure assets. This project would likely siphon off funds for priority projects already in the Plan. Because the proposed Tollway is well outside the existing urbanized area it would function as a new outer limit for urban infilling causing unregulated sprawl. All of which undermines your regional plan's collaborative recommendations.

The contractor for IDOT did not compile the accumulative effects of the proposed Tollway making it impossible to fully assess the negative impacts that the Tollway will have on important natural resources such as Midewin, the Kankakee River, and wetlands and farmlands. Moreover the mitigation costs associated with these effects could push the cost even higher. These flaws and omissions are not consistent with responsible urban and transportation planning.

The state of Illinois and the Greater Chicagoland Region cannot afford this very expensive project that is inconsistent with the principles and recommendations of the GO TO 2040 Plan, the resource that was developed to provide guidance on these very issues.

Sincerely,



Michelle Carr  
State Director



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August 28, 2013

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Chicago Metropolitan Agency for Planning  
Plan and TIP amendments  
233 S. Wacker Dr., Suite 800  
Chicago, IL 60606

I am writing on behalf of The Wetlands Initiative to express our strong belief that the proposed Illiana Expressway should not be included as a fiscally constrained major capital project under the GO TO 2040 comprehensive regional plan.

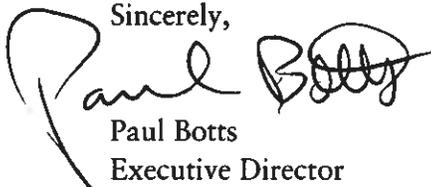
On the merits of the Illiana as a transportation project CMAP's own staff analysis is clear and persuasive: it simply doesn't add up. The Illiana cost estimates are unrealistic, the alleged public-private financing model is vague and at best hypothetical, it's based on unsupportable growth forecasts, and it won't even address Will County's genuine need for improved road infrastructure. Indeed if anything the Illiana will make things worse not better for Will County residents who are already struggling with rapidly-rising truck traffic.

From a regional perspective the Illiana is a terrible idea as well. The notion that it could significantly ease long distance truck traffic on I-80 is, given the actual route that long-haul truckers would have to take and the tolls cost compared to the non-toll I-80, not credible. More broadly the Illiana proposal violates the core principles and key strategies of the GO TO 2040 plan. Indeed if a poorly-planned and regionally-inappropriate boondoggle such as this can be belatedly forced into the regional plan one might reasonably ask what the purpose and relevance of regional planning is.

In addition the Illiana Expressway as proposed would do enormous harm to some of the Chicago region's most significant natural assets such as Midewin National Tallgrass Prairie and the Des Plaines Conservation Area. It would degrade habitat for a number of federally- and state-listed species, damage globally-rare natural communities which have been the subject of millions of dollars of investment in restoring them to ecological health and beauty, and reverse the exciting current growth of those protected areas as tourist draws.

In sum, to belatedly ram this expensive mistake of a project into the GO TO 2040 comprehensive plan would violate the very basis for CMAP's standing and relevance as an agency.

Sincerely,



Paul Botts  
Executive Director

**From:** [CMAP Web Support](#)  
**To:** [Info](#)  
**Subject:** Contact CMAP  
**Date:** Tuesday, September 03, 2013 10:56:22 AM

---

\* Full Name : Joy  
\* Address : Knobloch  
\* City : Manhattan  
\* State : Illinois  
\* Zip Code : 60442  
Business Phone : 615-278-1107  
Home Phone : 815-690-5517  
\* Email Address : knobloch.joye@gmail.com  
Comments/Question : Dear CMAP Planners -  
PLEASE CANCEL PLANS FOR MIS-GUIDED  
ILLIANA TOLLWAY ASAP. The "facts" are not in your favor: CMAP did not follow correct procedures, as  
outlined in the  
"Go To 2040" agreement. CMAP LACKS SUFFICIENT KNOWLEDGE OF (or concern for)  
REGIONAL CLIMATE AND ENVIRONMENTAL  
REQUIREMENTS. CMAP has not taken into consideration the updated clarifications specified  
in Presidential Memo, dated May 17, 2013;  
regarding new restrictions on MAP-21 projects.  
Thank You. Joy Knobloch, Pres. Township  
Wildlife Soc., Manhattan, IL ([www.twpws.org](http://www.twpws.org))