



Chicago Metropolitan Agency for Planning

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MEMORANDUM

To: The Transportation Committee

Date: February 22, 2008

From: Transportation Improvement Program (TIP) Staff

Re: Public Comment on the RTP/TIP amendment

The following is a summary of the comments received on the proposed January FY 2008 Transportation Improvement Program amendment and staff notes on those comments. One comment was received on the Prairie Parkway project. A copy of the comment is attached.

Prairie Parkway TIP # 09-02-9033

Ms. Vineyard stated that the planned construction of the Prairie Parkway will benefit very few and would prefer to see the available funding used to widen IL RT 47.

The comment was forwarded to the Illinois Department of Transportation. They responded by stating that the section of the Prairie Parkway from IL 71 to US 30 will be the most heavily traveled and constructing an additional Fox River crossing will benefit local and regional travel. They continued to state that the Department supports adding lanes to IL 47 to address local transportation needs and the segment of IL 47 between I-80 and Caton Farm Road is included in the Preferred Alternative for the project.

Prairie Parkway TIP # 09-02-9033

Coalition 47+ stated that building this section of the Prairie Parkway will divert funds for immediate transportation needs in the region. They stated that the project will spur unmanaged growth and sever or use up to 7,500 acres of farmland. They continued to state that the roadway would damage fragile and rare natural resources. Additionally, some referenda have been passed in opposition to the roadway.

The comment was forwarded to the Illinois Department of Transportation. They responded by stating the funding issue is separate from the purpose and need of the

Prairie Parkway project, which is to increase regional north-south mobility, to address local system deficiencies, to improve access to regional jobs, and to improve safety. The Department's studies of local road alternatives similar to 47+ proposal were found to address local system deficiencies, but were found to be deficient in addressing regional north-south mobility, job access, and safety in comparison to the Preferred Alternative. The Department is addressing many of the 47+ proposals for state routes with separate projects independent of the Prairie Parkway study, while proposals for other routes are the responsibility of local agencies not under the Department's direct control.

Furthermore, the Prairie Parkway study has encouraged local participation in the planning of the project and its associated land use, transportation and environmental implications by initiating the project's Corridor Planning Group (CPG), which is made up of local elected municipal and county officials in proximity to the project. Through the CPG's Land Use Task Force, discussions have resulted in draft corridor planning guidelines that promote managed growth and discourage conflicting development. Environmental features have been incorporated in the project with the assistance of the CPG's Environmental Task Force to reduce the project's environmental impacts, especially with regard to forested areas, wetlands and water resources. The CPG's Transportation Task Force has been instrumental in assisting the Department in choosing road closures and addressing property access issues to minimize impacts.

The Department recognizes the advisory referenda in the five townships in rural Kane and Kendall Counties, and remains sensitive to the needs and opinions of the township residents. The Department also considers the letters and resolutions of support of the Preferred Alternative from several counties and municipalities in the area, as this is a regional project with implications for the entire Chicago metropolitan area.

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From: Chrisi [<mailto:chrisivineyard@comcast.net>]
Sent: Saturday, February 02, 2008 10:01 AM
To: Tip
Subject: Prairie Parkway bad for KC

I would like for MY VOICE TO BE HEARD LOUD AND CLEAR regarding the Prairie Parkway.

The planned construction of 5 miles in the middle of the entire proposed PP, is not going to benefit but a very few. I was a participant in the 3 landfill hearings in Kendall County. At landfill hearing #2, under oath, the DOT said they worked HAND and HAND with the landfill owners, so the PP would be placed by the landfill. The DOT stated that the STATE Of Il. DOES NOT HAVE THE MONEY TO COMPLETE THE PP UNTIL AFTER 2030! The local residents of Yorkville, Oswego, & Plano desperately need and want to see this money used to widen Rt. 47 ASAP, and local everyday infrastructure. The PP will destroy the BEST FARM LAND AND WATER in our State.

Please listen to the local residents.

Thanks,

Chrisi Vineyard

39 Settlers Lane

Oswego, Il 60543

630-551-3701

February 15, 2008

Chicago Metropolitan Agency for Planning
Attn: RTP/TIP Comments
Sears Tower
233 South Wacker Blvd., Suite 800
Chicago, Illinois 60606

RE: Request to Deny Approval of Prairie Parkway TIP Amendment #09-02-9033

To Whom It May Concern:

Coalition 47+ urges the Chicago Metropolitan Agency for Planning (CMAP) to reject the proposed FY 2007-2012 Transportation Implementation Program (TIP) amendment for the Prairie Parkway. At this juncture, the request by the Illinois Department of Transportation (IDOT) is premature, since it has not yet issued a Final Environmental Impact Statement (EIS), addressing critical flaws in its analysis and providing a final assessment of the appropriateness of the proposed route.

In addition, approving the TIP amendment for the truncated 5-mile segment of the 37-mile project will divert critical funding from immediate transportation needs in the region, such as widening all of IL-47 to provide the benefit of an improved north-south connection between I-80 and I-88. With its exclusive focus on the small segment of the new roadway, IDOT has neglected funding for IL-47 widening in its FY2007-2012 plan. In fact, IDOT's 5-year program excludes any work on IL-47, beyond intermittent resurfacing and repair, south of U.S. 34 in Yorkville.

IDOT has demonstrated in its Draft EIS that this billion dollar project will ultimately spur unmanaged growth in areas designated in local land use plans as predominately agricultural and rural residential. It will take or sever up to 7,500 acres of some of the richest farmland in the world. IDOT failed to release the incredibly high Land Evaluation Site Assessment scores for the project area until after it closed the Draft EIS comment period. Farmland in the path of the highway scored 281 out of 300. IDOT did not give communities the opportunity to use these studies to determine whether farmland in their area was too valuable to destroy. This is underscored by the growing opposition in agricultural areas that would be adversely impacted by the project.

The Prairie Parkway would also damage fragile and rare natural resources. According to the Draft EIS, the four-lane highway will degrade pristine streams, such as Big Rock Creek and Aux Sable Creek, harm threatened and endangered species, and damage 57 jurisdictional wetlands. It will destroy 54 acres of forests, where 27 kinds of neo-tropical migrant birds are known to nest.

The natural areas surrounding the proposed 5-mile highway section between Illinois 71 and U.S. 34 are not immune to these effects. See Appendix A, "Comments on the Draft Environmental Impact Statement for the Prairie Parkway Study in Grundy, Kendall, and Kane Counties, Illinois (FHWA-IL-EIS-06-02-D)," Environmental Law and Policy Center, Openlands, Citizens Against

the Sprawlway, Illinois Chapter of Sierra Club, *et al.* (Feb. 27, 2007), pp. 24-28. The 5-mile segment would include a six-span steel bridge across the Fox River, approximately a mile east of Silver Springs State Park. The Fox River is designated as an Illinois Natural Area, qualifying as a Category II, III and IV Illinois Natural Areas Inventory (INAI) site because, in part, it is host to a number of state-listed threatened and endangered species, and is close to two Illinois Nature Preserves. The project corridor clips the edge of extremely high quality wetlands along the south bank of the Fox River, with a state-endangered plant found approximately 150 feet and 350 feet from the highway right-of-way, within reach of salt splash and spray. The highway would eliminate 6.3 acres of a forest stand that harbors 13 species of neo-tropical migrant birds, and is possible habitat for the state-endangered Osprey.

In return, the Prairie Parkway will provide little traffic improvement. IDOT's revised traffic study attempts to bolster the highway's effectiveness by including statistics for WiKaDuKe, a road not included as a part of the Prairie Parkway project. Its own data shows that construction of the highway will do little to reduce traffic on IL-47 through Yorkville. IDOT's projections showed 48,000 vehicles a day in 2030 at the Fox River in Yorkville if the Prairie Parkway is built, and 48,200 vehicles a day if the freeway is not built – a mere difference of 200 vehicles a day. (A noted increase in truck traffic on IL-47 is included in these figures.) Both projections assume that IL-47 will be widened to four lanes by that time. *See* Appendix C, IDOT Letter Concerning Traffic Projections (Nov. 27, 2007).

Opposition to the highway project has been steadily increasing. In referenda last April, residents of Kaneville and Big Rock townships in Kane County sent a clear message by voting to oppose the highway by 81 percent and 88 percent respectively. Three Kendall County townships added to the ranks by voting in advisory referenda to oppose the project on February 5, 2008. Lisbon Township, Fox Township and Seward Township would all be directly affected by the proposed Prairie Parkway. The five townships cover the proposed 37-mile route with the exception of the Plano and Yorkville areas. These constituents have the support of several Illinois legislators within the Districts of the project area.

There is a better choice for the region. Instead of spending over one billion dollars on a single north-south route predominantly running through rural areas, which IDOT admits in its Draft EIS provides “quite small benefits,” the State's limited funding can be used to widen all of Illinois 47 between I-80 and I-88, and improve a local network of roads where communities have planned for development. Investing in local infrastructure not only resolves traffic problems, but gives farmers a choice over the future of their land, and minimizes damage to irreplaceable natural areas.

We urge CMAP to deny support to IDOT's requested TIP amendment for this contentious and premature transportation alternative, and respectfully request that it recommends applying the \$207 million federal earmark to address immediate traffic problems along IL-47. This would better meet the transportation needs of the region, and squarely falls under the SAFETEA-LU funding mandate. IDOT openly stated at its road closure hearing that IL-47 is “a north-south connector between I-80 and I-88”, which is the language of the SAFETEA-LU provision. Three other projects on the SAFETEA-LU list are routes like IL-47 that connect two interstate highways. Despite IDOT's contention that unspecified legislative intent dictates that it devote the federal earmark to the Prairie Parkway, it has failed to substantiate that any documentation of such intent exists to support this contradictory premise. Since funding was secured well before

IDOT chose a route, and IL-47 falls squarely within the written legislative criteria for the \$207 million in federal funding, it is clear that the SAFETEA-LU line item can be applied to IL-47.

Coalition 47+ appreciates the opportunity to comment on this proposed TIP amendment. If you have any questions, please contact Stacy Meyers-Glen (312-863-6265), Jan Strasma (630-863-6669), or Nancy Wagner (312-780-7431). Thank you for your time and attention.

Sincerely,

AMERICAN FARMLAND TRUST



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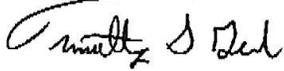
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Appendices

Coalition 47+ has attached its February 2007 joint comment letter detailing the fundamental flaws in the Draft EIS, including transportation, land use planning, agricultural and environmental analyses of IDOT's proposal. The coalition has also attached as Appendix B a subsequent joint comment letter, which provides additional information on IDOT's revised traffic analysis. For clarification, Coalition 47+ provides a letter by IDOT with its own figures showing the difference of 200 vehicles a day on IL-47 if the proposed highway is not built. Finally, for reference, the coalition submits two maps and keys illustrating a more comprehensive local alternative to the highway and adverse impacts to natural areas that would occur if the Prairie Parkway were built.

Appendix A: Comments on the Draft Environmental Impact Statement for the Prairie Parkway Study in Grundy, Kendall, and Kane Counties, Illinois (FHWA-IL-EIS-06-02-D)," Environmental Law and Policy Center, Openlands, Citizens Against the Sprawlway, Illinois Chapter of Sierra Club, *et al.* (Feb. 27, 2007).

Appendix B: Coalition 47+ Joint Comment Letter on Road Closure Analysis (2007)

Appendix C: IDOT Letter Concerning Traffic Projections (November 27, 2007)

Appendix D: Illustrative Map and Key Showing a Local Transportation Alternative to the Prairie Parkway

Appendix E: Illustrative Map and Key Showing Impacts to Natural Resources (B5 route is the proposed Prairie Parkway.)