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April 30, 2001

Via Overnight Courier

Mr. John P. Kos, P.E., District Engineer
Illinois Department of Transportation
201 West Center Court
Schaumburg, IL 60196

Re: Additional Comments on Draft Supplemental Final Environmental Impact Statement and Section 4(f) Evaluation -- FAP 340 (I-355 South Extension)

Dear Mr. Kos:

Thank you for the opportunity to submit these additional comments on the Draft Supplemental Final Environmental Impact Statement and Section 4(f) Evaluation for the FAP Route 340 (I-355 South) tollroad extension (the DSFEIS). These comments are submitted on behalf of Lincolnway South Corridor Against the Tollway, The Sierra Club, Illinois Chapter, Business and Professional People for the Public Interest, and the Environmental Law and Policy Center of the Midwest (Commentors).

Our February 28th comments criticized, among other things, the Illinois Department of Transportation's failure to analyze and discuss the Action Plan alternative to the proposed tollroad. These additional comments, together with the comments of Norman L. Marshall, Senior Project Consultant for Resource Systems Group, address the results of Resource Systems Group's modeling of the travel benefits of the proposed tollroad and the Action Plan alternative.

The Commentors requested that the nationally respected transportation modeling team of Resource Systems Group and Dr. David Boyce of the University of Illinois Chicago analyze the comparative travel benefits of I-355 South and the Action Plan, using a regional travel demand model based on data from the Chicago Area Transportation Study. Resumes setting forth the stellar credentials of Dr. Boyce and Mr. Marshall, along with a detailed description of their travel model, are enclosed with these comments. The objective of their study was to determine whether the Action Plan would provide significant enough travel benefits, by comparison to I-355 South, to merit further, detailed study by IDOT in the DSFEIS process as an alternative to the tollroad. The modeling results reported in the attached comments of Mr. Marshall lead to three major conclusions:

- The Action Plan should be carried forward in the Supplemental EIS process as an alternative to the tollroad. It provides regional travel

benefits comparable to the tollroad, and its local travel benefits are likely to far outweigh those of the tollroad.

3.13
- Flawed modeling in the DSFEIS led to a gross overstatement of tollroad benefits. Actual tollroad benefits are likely to be minor, at best, even for most regional trips. The tollroad would provide no appreciable local travel benefits.

- The travel benefits of the proposed tollroad are so negligible as to call into question anew whether the cost and environmental harms can possibly be justified. At a minimum, the paltry benefits of the tollroad should lead to a reexamination of alternatives rejected by IDOT in the DSFEIS.

3.29 Flaws in the DSFEIS Modeling Leading to Overstatement of Tollroad Benefits

As detailed in both the February 2001 and April 2001 comments of Norman L. Marshall, the travel models used in the DSFEIS have flaws leading to predictions sharply at odds with observed travel behavior. In particular, the models used in the DSFEIS produced the highly improbable prediction that large numbers of Will County residents would drive between 90-140 minutes each way to jobs in the west and northwest suburbs. (DSFEIS Appendix B, page B-6.) Census travel data, common sense observation, and reams of professional literature indicate that such a future is highly unlikely. (April 2001 Marshall Comments at 2-5.) The DSFEIS' prediction that the tollroad would bring large travel time savings is premised on its assumption that Will County residents would make such backbreaking commutes in large numbers. (April 2001 Marshall Comments at 5.)

3.14 When the flaws are corrected and the travel models are run correctly to produce more reasonable commutes, the tollroad's benefits for regional travel drop sharply. Using evening work commutes from regional job centers to locations in the study area as the basis for analysis, the tollroad actually increases travel times for commutes to Lemont. (April 2001 Marshall Comments at 6-7.) Evening commutes to Lockport are helped only marginally: 2.5 minutes per trip, or 4.1%. (Id. at 6.) Trips to New Lenox from job centers further north, those helped the most by the tollroad, are shortened by only 10% rather than the 20% reduction reported in the DSFEIS.

Moreover, the tollroad produces no appreciable benefits for local trips within northern Will County. (April 2001 Marshall Comments at 8-9.)

Action Plan Benefits Compared to Tollroad Benefits

3.30 The Action Plan's performance on travel to regional job centers is nearly as good as the tollroad.
Comparative travel times for work trips for residents of Lemont and Lockport under both the I-355 South and Action Plan scenarios are a wash. Specifically, compared with the tollroad, the
5.2 Action Plan results in a savings of about a minute and a half for work trips to and from Lemont and adds an extra minute and a half for work trips to and from Lockport. (April 2001 Marshall Comments at Tables 3,4,6 & 7.) The only work trips that benefit appreciably from the tollroad

are the few that originate in New Lenox and travel north, and even then the time savings is under seven minutes per trip. (Id. at Tables 2 & 5.) Even that benefit may be exaggerated. (Id. at 6-7.)

With respect to local trips, the Action Plan will have far greater benefits than the tollroad. (April 2001 Marshall Comments at 10.) Unlike the tollroad alternative, which provides for no improvements to local roads, the Action Plan provides for a series of improvements to local arterial roads including additional lanes, left turn lanes, intersection improvements, and traffic management strategies. The benefits of many of these types of improvements are substantial and easily measurable using available tools, but they cannot be estimated with regional travel models. (April 2001 Marshall Comments at 9; February 2001 Kuner Comments at 17-20.) The regional travel model results therefore do not reflect many of these local travel benefits. Resource constraints prevented Resource Systems Group and Dr. Boyce from measuring benefits with tools beyond the regional travel models. IDOT should do so as part of its ongoing studies relating to the Supplemental EIS process.

Other Alternatives

3.31 The DSFEIS rejects non-tollroad alternatives, including the no-build alternative, out of hand. The Resource Systems Group/UIC modeling results suggest that all of those alternatives should be reconsidered. The proposed tollroad would have negligible benefits at best, shortening only a small number of regional trips by only a few minutes apiece. Because it performs only marginally better than even the no-build alternative, at a cost of $825 million and significant damage to wetlands and forest preserves, the tollroad alternative should be subjected to greater scrutiny. If the no-build and the other alternatives fail to meet purpose and need, then how can the tollroad be deemed to do so? If its benefits are so marginal, how can the tollroad satisfy the requirements of Section 4(f)?

Conclusion

The Resource Systems Group/University of Illinois Chicago modeling demonstrates that the Action Plan should be fully analyzed as a viable alternative in the Supplemental EIS. Moreover, in light of the marginal benefits of the proposed tollroad, all other alternatives, including the no-build, should be given more careful consideration. At a minimum, given the small differences in the performance of various alternatives for regional trips, the comparative environmental impacts of the various alternatives should be carefully analyzed.

The Commentors would be pleased to provide any additional information concerning the Resource Systems Group/University of Illinois Chicago modeling of the Action Plan.

Sincerely,

Robert L. Jones, Jr.	Ann M. Spillane
Staff Counsel	Senior Attorney
Business and Professional People	Environmental Law & Policy Center

for the Public Interest

cc: Mr. Ron Abrant
Mr. Randy Blankenhorn
Mr. Richard Christopher
Mr. Jon Paul Kohler
Mr. Mike MacMullen
Mr. Jeff Mengler
Mr. Ron Moses

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