

Testimony for Federal Certification Review of CATS

Comments on CATS 2020 Plan: Destination 2020

At first glance, the Chicago Area Transportation Study's 2020 Regional Transportation Plan ("Destination 2020") appears to conform to many of the ideals set forth in ISTEA and renewed in TEA-21. These include a commitment to maintenance of existing highway, bridge, and transit systems; inclusive and honest planning processes; and significant funding for alternatives to the highway system. The seven goals and 39 accompanying objectives which frame the plan seem to be fairly in tune with federal guidelines. Unfortunately, many of these goals and objectives only bear a faint resemblance to the rest of the plan. Furthermore, even when the goals and objectives are followed in the plan, the actual operation of CATS deviates substantially from them.

The goals are listed on page 12 of the plan, in Figure 3.3 ("Goals and Objectives"). Following are several examples of disparities between the goals and objectives and the actual projects set forth in the plan, as well as areas where CATS falls short of following the plan in its actual operations. The environmental and social goals and objectives have received particularly short shrift in the programs CATS has chosen to fund. The discussion of the goals can be found in Chapter III and the plan itself is set forth in Chapter V.

Accessibility and Mobility

Goal: Provide an integrated and coordinated transportation system that maximizes accessibility and includes a variety of mobility options which serve the needs of residents and businesses in the region.

Objectives:

Facilitate transfers among all transportation modes on existing and new facilities.

CATS has done nothing to facilitate transfers between Chicago's three transit providers, CTA, Metra, and Pace. The lack of a unified fare currency for the three systems is not only an inconvenience and deterrent to taking mass transit, but also a significant hardship for the welfare-to-work population. As most of those making the transition from welfare to work live in the city and most of the entry-level job openings are in the suburbs, it is often necessary to transfer between the different providers to reach these jobs. Furthermore, suburban employers have difficulties finding enough workers who can get out to their jobs from the city. CATS should take a lead role in helping coordinate the transportation systems with the RTA.

Improve access to transit, including expanded opportunities for auto, bicycle and pedestrian access.

Aside from some parking lots at Metra stations which have increased auto access to transit stations, little progress has been made on the bicycle and pedestrian side of things. The prohibition of bicycles on Metra eliminates the possibility of multi-modal commuting to and from the suburbs.

Support the development and increased use of a coordinated network of bicycle and pedestrian transportation facilities.

Again, little substantive work has been done on this objective.

Improve and expand transportation opportunities which serve long established travel patterns, such as the suburban-to-city commute, and new and changing travel patterns including city-to-suburb and suburb-to-suburb travel.

A CATS memo dated 11/16/98 to the CATS Community Mobility task force admits that none of the programs in the 1998-1999 Transportation Improvement Program are particularly well suited for the Job Access and Reverse Commute Program. CATS continues to address the suburban-to-city (“traditional”) commute while giving insufficient attention to the reverse commute.

Improve transportation facilities important for the movement of goods, including those which provide access to intermodal freight facilities.

Although the importance of intermodal freight is mentioned several times in the plan, in practice few resources are devoted to this infrastructure. From 1980 to 1997, IDOT reports that an average of only \$5 million per year was spent on rail infrastructure for the whole state.

Transportation and Land Development

Goal: Provide a transportation system that supports existing and future patterns of land development as recommended by locally adopted land use plan and the Northeastern Illinois Planning Commission’s Strategic Plan for Land Resources Management, as reflected in the endorsed socioeconomic forecast.

Objectives:

Promote the planning and design of employment centers, commercial facilities and multi-use activity centers that allow for convenient and safe transit, bicycle, pedestrian, automobile and freight access and distribution.

Nothing in the rest of the plan nor in the CATS program promotes this sort of employment center.

Environmental

Goal: Provide a transportation system which is sensitive to the quality of the environment and enhances our natural resources.

Objectives:

Develop a transportation system that avoids or minimizes adverse impacts on environmentally sensitive areas, historic and cultural sites, greenways, agricultural land, recreational areas and other valuable natural resources.

Not only does the plan fail to minimize adverse impacts, it often proposes solutions that will exacerbate them. For example, the plan recommends the construction of a new six-

lane 23 mile tollway extension in Lake County that will pave over valuable natural resources while attracting many new residents to the area and further impacting the environment. Many of the other highway projects in the plan which add capacity will have similar effects.

Promote the development of a transportation system that contributes to meeting National Ambient Air Quality Standards (NAAQS), including the development and implementation of effective Transportation Control Measures (TCM).

The Northeastern Illinois has been designated a severe non-attainment region for ozone by the Environmental Protection Agency. Although the 2020 plan claims that the region will have made a small dent in reducing emissions of volatile organic chemicals by 2020 (about 6% reduction), this reduction itself is suspect given the increase in vehicle miles traveled the plan accommodates. Even if a 6% reduction is achieved, the region will remain a non-attainment region, especially as more stringent standards are implemented, including the 8-hour 0.08 ppm standard for ozone currently being phased in.

Develop a transportation system that promotes energy efficiency.

Nothing in the plan or in CATS' operation acts to promote energy efficiency. Although the plan claims to support energy conscious transportation choices by including bicycle and pedestrian travel, little progress has been made in implementing the set of policies for bicycles and pedestrians. For example, the plan recommends that CATS should "accommodate bicycles on transit, where feasible." (p. 38) Yet, CATS has not done anything to achieve this goal. Nor have bicycle and pedestrian projects been given priority in areas where there are a high number of short auto trips, as recommended by the plan (also p. 38).

Encourage the design of transportation facilities that minimize adverse noise and vibration impacts.

There is no further consideration of noise and vibration impacts in the plan.

Encourage the design and landscaping of transportation rights-of-way to reduce maintenance costs, promote regional biodiversity, improve water quality, manage stormwater and improve aesthetics.

The list of projects in the plan don't include any measures that would *improve* aesthetics, water quality, or regional biodiversity. In fact, the numerous projects to increase highway capacity will all have the opposite effect.

Economic

Goal: Provide a transportation system which fosters economic development.

Objectives:

Develop a transportation system, including improved intermodal connections, that enhances the Chicago region's position as a major hub of national and international passenger travel and goods movement.

Although this objective is the top of the list under the economic goals of the plan, intermodal connections are certainly not prioritized in the planning process. Chicago's position as a major hub is endangered by its lack of investment compared to places like Kansas City, Memphis, and Columbus, Ohio. CATS is not working to enhance Chicago's position as a major hub of goods movement.

Provide a transportation system that accommodates and encourages tourism.

None of the projects listed in CATS' plans appear to have any relevance to encouraging tourism in the region.

Social

Goal: Provide a transportation system which fosters social benefits.

Objectives:

Expand reasonably priced travel options for the economically disadvantaged and persons without access to automobiles.

There are virtually no further recommendations in the plan for expanding reasonably priced travel options, and CATS has not addressed this issue, as is consistent with its lack of attention to welfare-to-work issues generally.

The only item in the plan that might be construed as expanding reasonably priced travel options is the "Direct Transit Incentive" listed as a Transportation Management Strategy. The plan recommends increasing the RTA's TransitCheck program, which provides tax exempt transit benefits and thus could make transit marginally more affordable. Even this one recommendation, however, has not resulted in any action. In fact, members of the CTA board of directors recently complained that the RTA was not adequately marketing the program and voted to initiate a separate benefits program. The plan recommends increased marketing of Transit Check but CATS did not follow through.

Promote the development of a transportation system that improves travel opportunities for people with disabilities.

There are no projects listed in the plan that would specifically improve travel opportunities for people with disabilities. Although some of the transit projects might conceivably result in increased mobility for disabled people, there is no evidence that these improvements take into account these special needs. This objective appears to be ignored in the plan.

Improve access to the region's natural, historic, recreational and cultural resources.

No projects explicitly address this objective. Furthermore, the CATS Ad Hoc Work Program Committee Subcommittee on Rail Transfer Stations has acted particularly slowly

in addressing the possibility of Metra access to Chicago's baseball parks. In fact, CATS only agreed to consider this possibility under legislative pressure.

Minimize neighborhood disruption associated with transportation improvements.

Again, this objective does not appear to be a factor in any of the projects set forth in the plan.

Provide a transportation system that serves all residents in their daily activities.

Although the needs of some residents are served by the plan, others are largely ignored. The bias towards suburban infrastructure over city and lack of attention to reverse commute projects means that *all* residents will not be served by the plan.

Financial

Goal: Provide for the development and preservation of a transportation system which meets the region's transportation needs, efficiently uses financial resources and is financially attainable.

Objectives:

Pursue all available opportunities, including innovative financing mechanisms, to fund the planning, design, construction, operation and maintenance of the region's transportation system.

Chapter VII of the plan describes its financial strategy and declares from the outset that "the funding assumptions in the plan would focus on existing sources." The discussion of innovative financing mechanisms at the end of the chapter concludes that "innovative funding strategies are likely to have appeal only for localized areas or specific projects," essentially dismissing any fundamental innovations in funding the regional transportation system. CATS has done little in practice to pursue innovative financing.

Encourage cost effective operating policies and capital improvements.

CATS has not worked to make sure its capital improvements are cost effective. For example, in many other states, roads must be guaranteed by the contractors who build them, thus insuring a sound infrastructure investment. CATS has not tried to implement any similar policies in the northeastern Illinois region.

Furthermore, although the plan claims that over 80% of projected resources will go to maintain the existing highway and transit systems, only 55% of investments in the Fiscal Year 1997 programming went to existing infrastructure. The remaining 45% were allocated to additions and expansions of the system. Taking into account only highways, only 41% of the resources was used for existing infrastructure. The numbers for Fiscal Year 1998 are even worse. This amount of investment in additional capacity is not a cost effective policy as so much of the existing infrastructure is already in great need of maintenance. Adding new lanes and extending highways will only increase the cost of repairing the existing deferred maintenance needs of the transportation system.