

**ATTACHMENT  
IDOT RESPONSE TO THE  
CHICAGOLAND TRANSPORTATION & AIR QUALITY COMMISSION  
MAY 9, 2005 REVIEW OF THE PRAIRIE PARKWAY  
PRELIMINARY ENGINEERING STUDY, PART A**

The Illinois Department of Transportation (IDOT) has reviewed the May 9, 2005 *Review of the Prairie Parkway Preliminary Engineering Study, Part A* prepared by the Chicagoland Transportation & Air Quality Commission (CTAQC) and offers the offers the following clarifications:

**Executive Summary**

- Page 2, Second Paragraph, “The PES-A fails to lay the groundwork .... In some areas, the PES-A violates the “best practices” as well as the law.”

*The Prairie Parkway Study has followed all relevant laws, including the National Environmental Policy Act requirements, and has adhered to IDOT’s standards and requirements. Furthermore, the Prairie Parkway is serving as a pilot for IDOT’s Context Sensitive Solutions policy resulting in extensive stakeholder involvement.*

- Page 2, First Bullet Point, “The PES-A relies on large percentage changes to small base numbers exaggerate the need for a highway in western Kane and Kendall Counties.”

*The Transportation System Performance (TSP) report, which documents Part A, and the subsequent Purpose and Need presents data both in terms of absolute and percentage changes in order to make the information as understandable as possible to the public. Thresholds of deficiencies are defined by nationally recognized standards, such as level of service and volume-capacity ratios. No special emphasis is placed on western Kane and Kendall County because no alternatives are considered in Part A.*

- Page 2, Second Bullet Point, “In several cases the data suggests one remedy and the analysts offer another, “...Currently, the highest traffic volumes are in the eastern portion of the study area. Future increases...”

*The TSP report was prepared to identify transportation problems and needs. No solutions or “remedies” are proposed in the TSP report. The higher traffic volumes in the eastern portion of the study area are also indicative of the transportation supply (facilities and services) of the baseline transportation network in the study area.*

- Page 2, Third Bullet Point, “The study area stops short of I-39 to the west, which is an existing north-south interstate route with relatively low average daily traffic”

*The Prairie Parkway study area was defined from IL-59 on the east to IL-23 on the west, a distance of approximately 32 miles. This is a large study area by almost any standard. In addition, the Prairie Parkway study area incorporates three of the fastest growing counties in the United States, as identified by the U.S. Census Bureau.*

- Page 2, Fourth Bullet Point, “The population in the study area is inflated in a number of ways ... The purpose of including populous areas at a good distance from the project is to conceal that only a negligible number of drivers and businesses could make regular use of the proposed project – unless rapid development follows construction of the highway.”

The demographic projections used have been subject to extensive public review. The TSP identified the population and employment forecasts for counties contained in the study area. In Part B, the 2030 population forecasts were updated and are shown below for the study area:

Study Area	2000	2030	Change
Population	550,100	1,035,400	+88%
Employment	271,500	543,300	+100%

The demographic data are consistent with the forecasts developed by the Northeastern Illinois Planning Commission for counties within their planning jurisdiction, and are developed using regionally and nationally accepted forecasting methodologies. Only the portions of counties located within the study area are reflected in this data. The Purpose and Need reflects just the study area demographic projections shown above.

It should also be noted that the Part B testing of the wide range of potential solutions showed good utilization of virtually all of the alternatives.

- Page 2, Fifth Bullet Point, "Safety analysis fail to differentiate between fatal, serious-injury and property damage crashes, current and forecasted."

*Increases in both fatal and non-fatal crashes are forecasted to occur when future traffic volumes are carried on the limited 2030 baseline roadway network. More specific studies of safety, including fatalities, are currently being performed in Part B of the study. Total vehicle trips originating in the study area are forecasted to grow by 85% between 2000 and 2030. Safety is definitely a deficiency when that increase is placed on the limited existing roadway network.*

- Page 2, Sixth Bullet Point, " The PES-A fails to assess the effect on household income of forcing all residents of eastern and western sections of the study area to drive for all trips ..."

*The purpose of the TSP report was to identify transportation problems and needs. This included a description of the study area transportation system, including streets and highways, public transportation, freight, and non-motorized transportation, as well as the socio-economic characteristics of the study area. In addition, an analysis of areas that could support fixed-route bus transit based on Pace service criteria was performed in the TSP report.*

- Page 2, Seventh Bullet Point, "The bulk of the Characteristics and Measures section of the PES-A is comprised of traffic counts, driver surveys, travel forecasts and other technical measures that fail ... the underlying assumptions are narrow and faulty or the use of large percentage increases to low base numbers ..."

*The TSP report and the subsequent Purpose and Need presents data both in terms of absolute and percentage changes in order to make the information as understandable as possible to the public. Thresholds of deficiencies are defined by nationally recognized standards. Traffic forecasts were developed using the same procedures used by the Chicago Area Transportation Study (the Metropolitan Planning Organization for the northeastern Illinois region) for preparing long range transportation plans and programs for northeastern Illinois. Forecasts of future 2030 travel were not based upon simple extrapolations of percentage growth, but upon complex computerized travel demand forecasting models. This data has been developed in close coordination with the regional planning organizations. They have found the forecasting methodologies and results acceptable.*

- Page 3, First Bullet Point, “The PES-A fails to begin an inventory of environmental and historic assets that would be impacted or destroyed by a proposed Prairie Parkway. The project’s fate is directly and profoundly dependent on being able to overcome several tests to prove compliance with federal environmental standards.”

*The purpose of Part A of the Prairie Parkway Study was to identify current and future transportation deficiencies and needs. IDOT said that the study could be terminated at the conclusion of Part A if sufficient needs were not identified. Consequently, environmental inventories were not included in Part A. However, after the identification of needs in Part A, an extensive inventory of environmental resources and an assessment of potential environmental impacts have been developed for Part B of the Prairie Parkway Study, and was presented to the public at the May 10 and 11 Public Information Meetings for the study. This inventory has been used to tabulate and assess a wide array of potential environmental impacts caused by the alternatives considered. The Prairie Parkway Study is being performed in strict adherence to the requirements and guidance mandated by the federal National Environmental Policy Act (NEPA). This extensive inventory of environmental impacts and the assessment of potential environmental impacts of alternatives have also been presented to NEPA/404 Merger Team resource agencies.*

- Page 3, Second Bullet Point, “Public involvement activities conducted for the purposes of this study were somewhat improved over past efforts, but still left a great deal to be desired. Populations frequently asked to take part in public involvement activities were disproportionately representative of sparsely populated sections of the region rather than from the congested eastern corridor.”

*The Prairie Parkway Study has had extensive stakeholder and public outreach. To date, IDOT has held five sets (two meetings per set) of public meetings in a variety of geographic locations in the study area. Project information is presented prior to and following each milestone in electronic and printed form that is widely distributed in public locations. Media outreach included 24 newspaper and radio outlets in the 1500+ square mile study area. Effective use was also made of stakeholder meetings to disseminate study information and identify public outreach strategies. Over 150 stakeholder meetings have been held to date, including meetings with counties, municipalities, agencies, business groups (chambers of commerce, economic development groups, etc.), farm bureaus, environmental/conservation groups (including the Prairie Alliance for Sensible Transportation that includes 14 members that represent environmental/conservation views), and civic groups. The project website is nationally recognized as an example of effective public involvement and newsletters are regularly sent to a mailing list of over 1,300 persons.*

- Page 3, First Paragraph after Bullet Points, “Environmental justice implications are casually ignored. Minorities, non-drivers and seniors appear to have been excluded from the focus groups, a potential violation of Environmental Justice policies, and laws protecting civil rights and access by disabled populations.”

*Part A of the Prairie Parkway Study involved the identification of transportation problems and needs. No actions (solutions) were identified or analyzed, so there were no disproportionately high or adverse effects on minority or low-income populations. Focus groups are small group discussions used to obtain qualitative information. They are not designed to be statistically representative samples. It was clearly stated in the Focus Group report that “As with any qualitative research of this type, the opinions expressed are from relatively few individuals. Although the participant recruitment was conducted randomly within the boundaries of certain criteria, the participants do not constitute a scientifically selected or statistically representative sample of the population in the entire region. Consequently, the report findings should be regarded as indicative, not conclusive.”*

## **I. Introduction**

- Page 6, Last Paragraph, “Flawed statistical procedures render some of the information unreliable. The failure of the PES-A to assess the “transportation system” as a whole, rather than as a highway system, encourage the notion that the study is designed to reach a foregone conclusion. In some areas, the PES-A violates the law as well as “best practices.” Exclusion of the travel needs of substantial populations (non-drivers, minorities, elders or children) is certainly poor practice; it may be actionable in court too.”

*The technical analyses presented in Part A were developed using regionally and nationally accepted forecasting and evaluation methodologies. The TSP report included a multimodal analysis of the study area transportation system, including streets and highways, public transportation, freight, and non-motorized transportation. The Prairie Parkway Study has followed all relevant laws, including the National Environmental Policy Act requirements, and has adhered to IDOT’s standards and requirements. The focus groups conducted in Part A were not designed to be a scientifically selected or statistically representative sample of the population in the study area.*

## **II. History and Background**

- Page 8, Last Paragraph, “For the purposes of this review, the proposed corridor is assumed to be generally illustrative of IDOT plans, although variations might be made if a final alignment is chosen.”

*The Prairie Parkway Preliminary Engineering Study was started with a clean slate. The study was not bound by the previous Corridor Protection Study. The first steps of the current Prairie Parkway Preliminary Engineering Study included the public outreach and technical studies to define the current and future transportation deficiencies, and assess the need for transportation improvements in the study area. This assessment is based upon the assumption of no major transportation improvements being implemented in the study area unless the projects are committed to be constructed by the year 2030. No such commitment exists for the Prairie Parkway protected corridor, so no consideration was given to impacts, locations, or modes of transportation created by potential solutions. Part A of the Prairie Parkway Study only identified deficiencies in the transportation system. Part B of the Prairie Parkway Study, which is currently underway, finalized the purpose and need for improvements, as well as identified and evaluated a wide range of possible solutions including widening existing roads, transit, traffic management strategies, and new freeways.*

- Page 9-11, “What Does the Public Say?” NIPC documentation of public opinion, CATS documentation of public opinion, and Connecting Communities documentation of public opinion.

*The documentation of public opinion from the NIPC, CATS, and Connecting Communities does not represent a scientifically selected nor statistically representative sample of public opinion for Kane County. Only the southern portion of Kane County is included in the Prairie Parkway study area. The Prairie Parkway Preliminary Engineering has conducted a statically representative telephone survey for the Prairie Parkway study area. The survey results are available on the website at [www.prairie-parkway.com](http://www.prairie-parkway.com)*

## **III. Review of Preliminary Engineering Study**

### **A. Socioeconomic Analyses**

- Page 12, A. Socioeconomic Analyses, “The PES-A consistently relies on large percentage changes to small base numbers to inflate, the need ...”, and bullet points on environmental justice implications, safety analysis failing to differentiate between fatal, serious injury, and property damage crashes, and the effect on household income of denying transportation options.

The TSP report presents data both in terms of absolute and percentage changes. For environmental justice, no actions (solutions) were identified or analyzed in Part A, so there were no disproportionately high or adverse effects on minority or low-income populations. Both fatal and total crashes will be estimated in Part B. With regards to household income, the calculation of the ways in which travel choice (or lack of) will impact income is outside the scope of this analysis. The CATS travel forecasting model use auto ownership in the trip generation procedures, and income quartiles in the trip distribution and mode choice procedures.

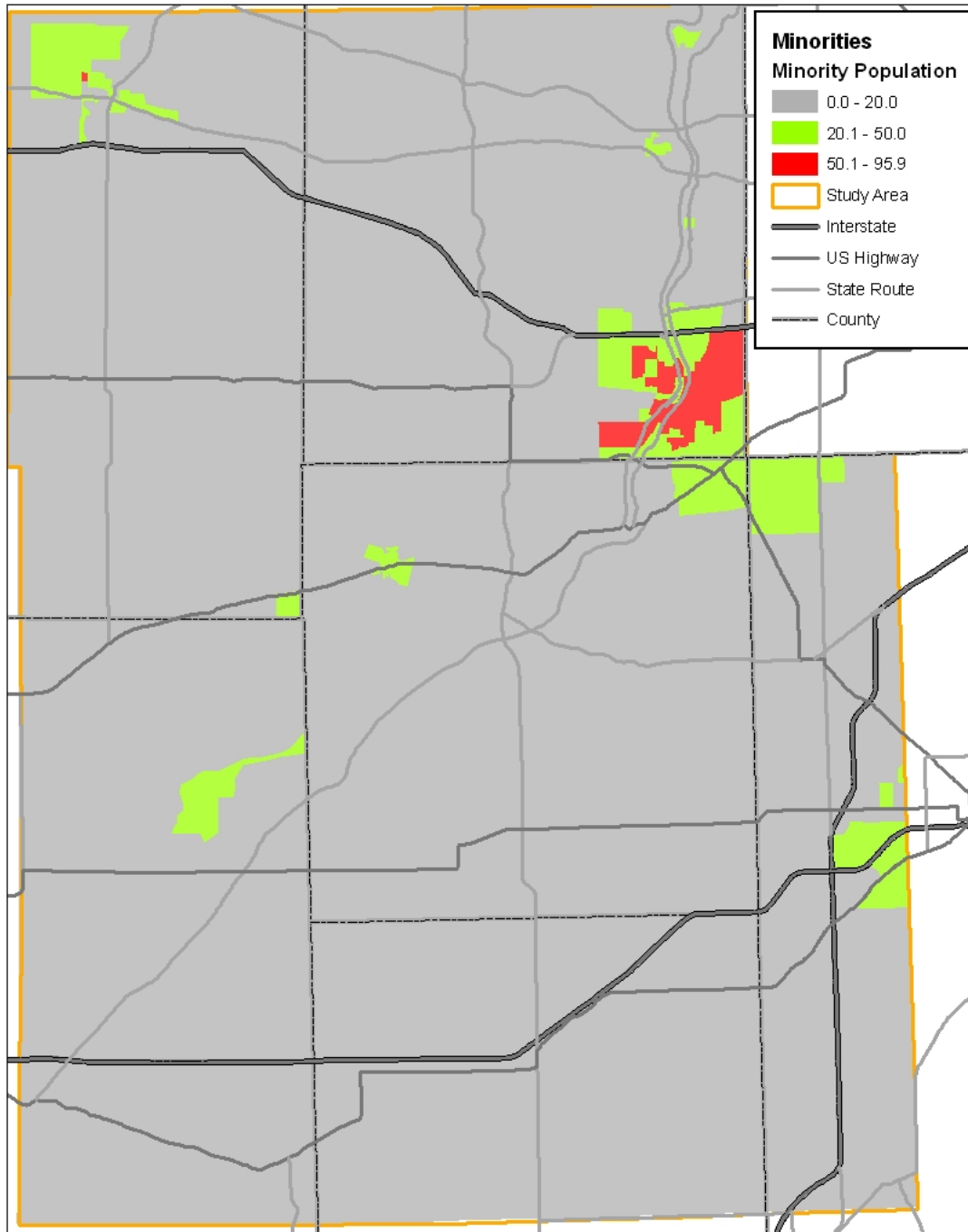
- Page 12-13, Population, study area population is 552, 093 and should included entirety of the five counties that are only partially encompassed in the study area. Minority population is 20% of study area population.

The TSP identified the population and employment forecasts for counties contained in the study area. In Part B, the 2030 population forecasts were updated and presented on page 2 of this attachment for the study area. The minority population by in the study area according to the US Census is presented below.

Study Area	Hispanic	Black	American Indian	Asian	Native Hawaiian	Other	2 or more Races
DeKalb Co.	4,734 (0.9%)	3,793 (0.7%)	106 (0%)	1,987 (0.4%)	38 (0%)	71 (0%)	787 (0.1%)
Grundy Co.	1,266 (0.2%)	59 (0%)	55 (0%)	99 (0%)	1 (0%)	3 (0%)	158 (0%)
Kane Co.	53,919 (9.8%)	15,136 (2.8%)	292 (0.1%)	3,133 (0.6%)	39 (0%)	187 (0%)	2,246 (0.4%)
Kendall Co.	4,086 (0.7%)	693 (0.1%)	84 (0%)	479 (0.1)	11 (0%)	45 (0%)	469 (0.1%)
LaSalle Co.	726 (0.1%)	945 (0.2%)	39 (0%)	77 (0%)	5 (0%)	11 (0%)	190 (0%)
Will Co.	6,906 (1.3%)	4,468 (0.8%)	175 (0%)	4,340 (0.6%)	33 (0%)	117 (0%)	1,336 (0.2%)
Total Study Area	71,646 (13.0%)	25,094 (4.6%)	751 (0.1%)	10,114 (1.8%)	127 (0%)	434 (0.1%)	5,185 (0.9%)

The largest concentrations of minority population in the study area include the Aurora area, the DeKalb area, the Joliet area, and a few isolated pockets. The minority population tends to be in existing municipalities, with the largest concentrations located near the edge of the study area boundaries. The figure below depicts the geographic location of the minority population in the study area.

Minorities as a Percent of Total Population



- Page 13, Second Paragraph, “the population that needs relief from traffic congestion is in eastern Kane and Kendall Counties.”

*The “Fox River Corridor” has different transportation problems than the Prairie Parkway study area. East-west mobility across the Fox River is a major transportation need for the “Fox River Corridor.” IDOT has previously performed five Fox River Crossing Studies to help address this*

transportation need. The Prairie Parkway Study is addressing north-south mobility in the study area.

- Page 15, Prairie Parkway Corridor 1980, 1990, and 2000 population by municipality shows high percentage growth rates, but minimizes the actual population figures.

*The purpose of the Transportation System Performance report was to identify transportation problems and needs for existing (2000-2004) and future (2030) conditions for the entire study area, not just a corridor around the previous corridor protection. Figure 3-2 in the TSP report presents the change in population between 2000 and 2030 by the number of residents (not percentage increase). Based on the purpose and need for this project, an increase in population in the Prairie Parkway study area between 2000 and 2030 of 485,300 residents is projected.*

- Page 16, First Paragraph, “the solution proposed is for the sparsely populated western portion.”

*The TSP report was prepared to identify transportation problems and needs. No solutions or “remedies” are proposed in the TSP report. The higher traffic volumes in the eastern portion of the study area are also indicative of the transportation supply (facilities and services) of the baseline transportation network in the study area.*

- Page 16, Fourth Bullet Point, “Drive development toward the agricultural land in western Kane and Kendall Counties...”

*The 2030 population and employment forecasts used in Parts A and B of the Prairie Parkway Study represent a “No Build” condition – no major new transportation facilities are assumed beyond committed projects in the study area. As shown in Figure 3-2 and 3-4 of the TSP report, the growth areas for population and employment are generally within and adjacent to existing municipalities.*

- Page 16, Third Paragraph, “... does not assess the potential effect of the Prairie Parkway proposal itself on the study area, i.e., it does not forecast what growth will be like with and without the highway ...”

*The purpose of the TSP report was to identify current and future transportation deficiencies and needs and did not evaluate alternatives, so the 2030 population and employment forecasts represent a “No Build” condition with no major new transportation facilities assumed beyond committed projects in the study area. In Part C, where a small number of alternatives will be evaluated in the Draft Environmental Impact Statement, a “Build” scenario for 2030 population and employment will be developed for use in evaluating the alternatives.*

- Page 16, Households, “There is no discussion of the household types anticipated. Will the study area be an island of young families ... a proportional share of older households ...”

*The household forecasts were developed by NIPC for the portion of the Prairie Parkway study area within the NIPC six-county region, and by the Prairie Parkway study team using similar procedures as NIPC for areas outside of the NIPC region. These forecasts outside of the NIPC region were reviewed by the respective counties. The household forecasts are used as input to the travel demand forecasting model, which is an expanded and detailed version of the CATS travel model. The CATS trip generation procedure uses the number of persons in a household, the number of workers in a household, the presence or absence of children in a household, and auto ownership to estimate household-based trip making.*

- Page 16, Employment, “...the PES-A anticipates that heavy residential development (which will inevitably follow construction of a highway) will generate large amounts of commuter traffic ... There is no discussion of current and future agricultural employment ...”

*The purpose of the TSP report was to identify current and future transportation deficiencies and needs and did not evaluate alternatives, so the 2030 population and employment forecasts represent a “No Build” condition with no major new transportation facilities assumed beyond committed projects in the study area. The employment section (in Section 3, Page 3-12 to 3-15) in the TSP report only addressed total employment. The land use section (in Section 3, Page 3-17 to 3-22) states that the majority of the study area is in agricultural use, but only a small proportion of the population lives at rural densities or is employed in agriculture.*

- Page 16, Income, “There are no calculations of the ways in which travel choice, or lack of choice, will impact income. Nor is there any discussion of the number of current and future households at the poverty level or without a vehicle.”

*The purpose of the TSP report was to identify current and future transportation deficiencies and needs and included a description of current and expected improvements to the roadway, public transportation, freight, and non-motorized transportation facilities and services in the Prairie Parkway study area and 2030 “No Build” population and employment forecasts. The calculation of the ways in which travel choice (or lack of) will impact income is outside the scope of this analysis. The CATS travel forecasting model use auto ownership in the trip generation procedures, and income quartiles in the trip distribution and mode choice procedures.*

- Page 17, Land Use, Second Paragraph, “Employment projections for 2030 indicate that 25-year job growth in the majority of mile-square segments of the study area will be less than 25 jobs, or less than one per year – and this may be an optimistic scenario (Figure 3-4).”

*The land use section of the TSP report (in Section 3, Page 3-17 to 3-22) states that the majority of the study area is in agricultural use, but only a small proportion of the population is employed in agriculture. Therefore, it follows that the majority of square mile sections (which would be agricultural) in the study area will have little or no growth in jobs. During Part B, the population and employment forecasts were updated to reflect the final adopted NIPC forecasts, recent development trends, and updated national county-level forecasts. Kendall County and their Mayors & Managers Group requested that IDOT re-examine the 2030 population and employment forecasts developed for Part A, because they thought they were too low.*

- Page 17, Comment, “The failure of the analysts in this study to calculate the needs of specific populations like people with disabilities, youth/elder or low-income populations is unreasonable ... no assessment of the current or future portion of the population that does not or cannot drive ... fails to report the current and future proportion of the population that is minority and whether or how minority group travel patterns and needs differ in any way from the mainstream ... focus groups ... failed to include non-drivers and minorities...”

*The technical analyses presented in Part A were developed using regionally and nationally accepted forecasting and evaluation methodologies. The Prairie Parkway Study has followed all relevant laws, including the National Environmental Policy Act requirements, and has adhered to IDOT’s standards and requirements. The focus groups conducted in Part A were not designed to be a scientifically selected or statistically representative sample of the population in the study area.*

## **B. Traffic Characteristics/Transportation System Performance Measures**

- Page 17, Fifth Paragraph, “... traffic counts, driver surveys, travel forecasts and other technical measures that fail for the same reason the demographic analyses failed – the underlying assumptions are narrow and faulty. What’s worse, in several cases the data suggests one remedy and the analysts offer another, in order to justify the Prairie Parkway as the only logical alternative.”

*The TSP report documented a comprehensive transportation analysis to identify transportation problems and needs in the study area. This study was started with a clean slate and this study was not bound by the findings of the previous Corridor Protection Study.*

- Page 18, First Full Paragraph, “The PES-A analysts factored a minimum of transit improvements into the travel forecasts for 2030, but only those listed as “committed transportation improvements” in the 2030 Regional Transportation Plan were included ... only major capital projects were included and that potential options like increased service frequency or new bus routes were excluded. Therefore the PES-A travel forecasts only assume the impact of Metra extensions to Elburn and potentially to Oswego, neither of which address the need for north-south travel options.”

*The Transportation System Performance report assumed, consistent with recommended federal practices for corridor studies, that 2030 Regional Transportation Plan projects be assumed outside the study area, and existing plus committed (i.e. No Build) be assumed within the study area. In this way, projects contained in the 2030 Regional Transportation Plan can be reasonably assumed to be in place outside of the study area, since the plan is financially constrained. Within the study area, no major transportation improvements are assumed (beyond committed projects) so that various alternative transportation improvements can be evaluated. Within the 2030 Regional Transportation Plan, bus service improvements, such as increased frequency of service and new bus routes, are treated as placeholders, since specific bus service improvements are not possible to identify with any precision for such a long time frame.*

- Page 18, First Full Paragraph, “Alternatives evaluation need to be run during Part B of the PES, transparently calculating the impact of several north-south transit options in or near the Fox River Corridor, where the actual congestion – present and projected -- exists. This alternatives analysis should include bus, express bus, bus rapid transit, and light rail options. It should also calculate how the population would disperse itself differently with strong transit options and a no-build scenario for the Prairie Parkway.”

*The purpose and need statement for this study identifies the need to address north-south mobility between I-80 and I-88. The Fox River Corridor comprises a different study area with different transportation problems and needs than the Prairie Parkway Study. Part B of the Prairie Parkway Study identified potential transit improvements for the study area, including light rail transit along IL-47 and then connecting to Aurora, new fixed-route and feeder bus service, park-and-ride lots, and reservation of transit right-of-way in freeway corridors. Given the wide range of alternatives, the re-allocation of 2030 population and employment for the analysis of the build alternatives to be studied in the Environmental Impact Statement will occur in Part C.*

- Page 18, Second Full Paragraph, “The analysis of truck traffic suffers from many of the same flaws ... There is no analysis of opportunities to shift truck traffic from roads to existing or new rail lines.”

*The analysis of truck traffic was consistent to the procedures used by the Chicago Area Transportation Study.*

- Page 18, Last Paragraph, “Average Daily Travel” is expressed exclusively throughout Chapter 4 as a percentage so that it is impossible for the reader to assess whether 100% growth is from two vehicles per day to four ...”

*Figure 4-5 on page 10 of the Transportation System Performance Report presents existing average daily traffic (in terms of daily traffic volumes), so the reader knows what the 2000 traffic is for the percentage change in traffic volume between 2000 and 2030 in Figure 4-6 on the following page. Similarly, Figure 4-7 presents existing truck average daily traffic, followed by the percentage increase in truck traffic between 2000 and 2030 in Figure 4-7.*

- Page 18, Last Paragraph, “Figure 4-6, Change in Travel Density 2000 to 2030, appears to signal massive congestion, until one realizes that the highest increases (10,000 vehicles or more per day) are on existing interstates and in the eastern areas that are dense enough to support transit (and where transit is reportedly desired by the populace). Travel density on arterials in western Kendall and Kane Counties need to be compared to other arterials in the region to give some context. “

*The Change in Travel Density 2000 to 2030 is presented in Figure 5-7 on page 5-15 shows that there are other areas with higher increases than existing interstates and the far eastern portion of the study area, including areas along US-30, IL-47, US-34, and IL-71. There are no arterial roads between IL-47 and IL-23 in the western portions of the study area – there are only collector and local roads.*

- Page 19, Third Paragraph, “Expansion of existing north-south routes has been the most frequently mentioned recommendation of the residents of the study area who responded to the comment on the Prairie Parkway in 2001 and 2002. The PES-A does not address that recommendation, but future reports will have to respond by transparently evaluating those alternatives.”

*The purpose of the TSP report was to identify current and future transportation deficiencies and needs and did not evaluate alternatives. In Part B, a wide range of alternatives were identified, including the widening of several existing roads in the study area.*

- Page 19, Third Paragraph, “Future analyses will also have to improve the evaluation of non-motorized, especially for the 80% of trips that are not commute trips ... Walking and bicycling are not analyzed in terms of their potential contribution to future congestion relief.”

*Non-motorized transportation is considered part of any comprehensive solution. For the study area, there are approximately 5,400 walk (almost half of which are in DeKalb) and 600 bicycle trips to work according to the 2000 census. This represents approximately two percent of total work trips in the study area. One of the stated needs from the Purpose and Need Statement is to address regional mobility. Pedestrian trips do not address regional mobility. Bicycle trails have been included in the Transportation System Management alternative in Part B of the study.*

- Page 19, Last Paragraph, Page 20, First Three Paragraphs, “The area in which the Characteristics and Measures analyses fail most completely is in the evaluation of safety and crash data. Future analyses need to distinguish between crashes with fatalities or injuries, and those involving simple property damage ... The only data offered is a table showing the current and project “vehicle miles of traveled” and crash frequency ... Based on this sketchy data, unclear but ominous outcomes are predicted ...”

*Part B analysis will include both fatal and total crashes. The analysis of future crashes is based upon generally accepted practices of using historical crash rates, which are expressed in terms of crashes per million vehicle miles of travel.*

- Page 19, Second Paragraph, “If population is the primary determinant of crashes, then the logic of building a road that will draw population further west is questionable. Why rearrange the population that will bear the risk instead of investigating less destructive – and less lethal – modal choices?”

*Future crashes were estimated by applying historic crash rates for the various types of road functional classifications (freeway, other principal arterial, rural and urban minor arterials, and collectors) to the projected vehicle miles of travel for those various types of roads. The crash projections for the TSP report The purpose of the TSP report was to identify current and future transportation deficiencies and needs and did not evaluate alternatives, so the 2030 population and employment forecasts represent a “No Build” condition with no major new transportation*

facilities assumed beyond committed projects in the study area. Part B includes the evaluation of a wide range of alternatives for crashes, including non-highway options such as transit improvements as you suggest. Also included in these alternatives are new roads that could result in the diversion of traffic from existing roads with higher crash rates to the new roads with lower crash rates.

- Page 19, Third Paragraph, “Issues that need to be addressed in future official studies, in addition to type of crash, include: relationship of speed to fatal and serious-injury crashes; number of fatal and serious-injury crashes in congested conditions; number of fatal and serious-injury incidents per transit mile (for comparison).”

*Part B analysis will include both fatal and total crashes for 2030. The analysis of future crashed is based upon generally accepted practices of using historic crash rates, which are expressed in terms of crashes per million vehicle miles of travel.*

### **C. Public Involvement**

- Page 20, Fifth Paragraph, “Given that the PES-A does not look at alternatives to the Prairie Parkway, the stakeholders were likely constrained to respond to the project itself rather than the full range of alternative solutions to congestion. Feedback from the stakeholder interviews is reported as a list of comments with no indication of high and low priority. This information would be more useful if the reader could ascertain the relative frequency with which comments were made.”

*Several rounds of stakeholder meetings have been held for this study. As documented in the TSP report, the initial round was conducted to inform the stakeholders of the study and to describe the process that would be followed. In addition, these stakeholder meetings provided insight regarding future development and transportation problems and needs, which is consistent with the focus of analyzing transportation system performance and identifying transportation deficiencies in Part A. In Part B, another round of stakeholder meetings was conducted to gain input on potential alternatives, and most recently, a round of stakeholder meetings was conducted to present the results of the evaluation of the alternatives and gain feedback on the alternatives evaluation. Stakeholder meetings are designed as informal, one-on-one meetings. They are not designed as a statistically representative sample of opinion on issues, so no attempt was made to indicate high and low priority or frequency that the comments were made. Unlike the public hearing for the original corridor protection where written comments were received, the stakeholder meetings are discussions with no formal written statements by the stakeholders.*

- Page 21, First Two Paragraphs, “Participant profiles (age, gender, occupation, place of residence) are explicit in the focus group report but not reported in the PES-A. The parameters for inclusion leave much to be desired ... Race/ethnicity is not reported, leading to the supposition that the group was homogeneous ... These demographic omissions are significant in determining the substantive outcomes ... It is not surprising that few reported using transit in the last month and most said they do not use public transportation at all ... Deletion of the demographic information from the text reproduced in the PES-A gives a very incomplete picture of public perception, especially given the other exclusions: non-drivers, older population and minorities ..”

*Part A of the Prairie Parkway Study involved the identification of transportation problems and needs. No actions (solutions) were identified or analyzed, so there were no disproportionately high or adverse effects on minority or low-income populations. Focus groups are small group discussions used to obtain qualitative information. They are not designed to be statistically representative samples. It was clearly stated in the Focus Group report that “As with any qualitative research of this type, the opinions expressed are from relatively few individuals. Although the participant recruitment was conducted randomly within the boundaries of certain criteria, the participants do not constitute a scientifically selected or statistically representative sample of the population in the entire region. Consequently, the report findings should be*

regarded as indicative, not conclusive.” The description of the focus groups in Chapter 6 of the TSP report is intended as a summary of the focus group report. Both reports are available on the study website at [www.prairie-parkway.com](http://www.prairie-parkway.com) or upon request to IDOT.

#### **D. Environmental/Historic Constraints**

- Page 21, Third Paragraph, “The PES-A does not inventory environmental and historic assets that would be impacted or destroyed by a proposed Prairie Parkway. Those assets will have to be thoroughly examined in future studies.”

*The purpose of Part A of the Prairie Parkway Study was to identify current and future transportation deficiencies and needs. IDOT said that the study could be terminated at the conclusion of Part A if sufficient needs were not identified. Consequently, environmental inventories were not included in Part A. However, after the identification of needs in Part A, an extensive inventory of environmental resources and an assessment of potential environmental impacts have been developed for Part B of the Prairie Parkway Study, and was presented to the public at the May 10 and 11 Public Information Meetings for the study. This inventory has been used to tabulate and assess a wide array of potential environmental impacts caused by the alternatives considered. The Prairie Parkway Study is being performed in strict adherence to the requirements and guidance mandated by the federal National Environmental Policy Act (NEPA). This extensive inventory of environmental impacts and the assessment of potential environmental impacts of alternatives have also been presented to NEPA/404 Merger Team resource agencies.*

- Page 21, Last Paragraph, “Future studies will need to assess the air quality impacts of additional highway infrastructure and calculate the air quality implications of a transit-intensive alternative.”

*Part C, which includes the preparation of a Draft Environmental Impact Statement (DEIS), will examine the air quality impacts of those “build” alternatives that are being analyzed in the DEIS.*

- Page 22, First Full Paragraph, “The protected right-of-way for this highway slices through some of the most environmentally sensitive natural features in northeast Illinois, including two of the highest quality creeks in the state – Aux Sable and Big Rock – and the Fox River. The impact of endangered species known to inhabit these waterways, the potential damage to Silver Springs State Park and the effect of contaminated runoff on groundwater aquifers are all serious threats deserving thorough and transparent investigation.”

*In Part B, a geographic information system (GIS) analysis of environmental and development features in the study area of a wide range of alternatives was conducted. This included an analysis of both natural and man-made features, including wetlands, floodplains, fens, streams/rivers, threatened and endangered species, parks, natural areas, CERCLIS sites, landfills, quarries, centennial farms, as well as existing buildings and planned and proposed developments. Sources for this information included the Illinois Department of Natural Resources, the Illinois Natural History Survey, the Illinois Department of Transportation, the Illinois Department of Agriculture, the US Environmental Protection Agency, and other federal, state, and local sources, included those provided by local conservation groups.*

*In Part C, a more detailed environmental analysis will be performed for those “Build” alternatives identified for analysis in the Draft Environmental Impact Statement. This will include environmental field surveys and the environmental analysis required by the National Environmental Policy Act (NEPA) and other federal and state requirements.*