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Appendix I

Purpose and Need Comments

From: Robert Barber [\[mailto:bobadm@villageofbeecher.org\]](mailto:bobadm@villageofbeecher.org)
Sent: Tuesday, December 06, 2011 5:27 PM
To: Susinskas, Kesti P.; Zak, Edward
Cc: Paul Lohmann
Subject: COMMENTS ON DRAFT ILLIANA REPORTS

I would like to comment or ask questions on the following:

DRAFT Purpose and Need Statement:

1. On pages 7 and 8, Tables 1-1, 1-2, and 1-3: Do these population, employment and vehicle trip figures for 2040 include the South Suburban Airport? If so, under which airport scenario do you use for 2040, a full-build or some smaller airport configuration?

DRAFT STP Report:

1. On Table 3-2 on page 42, why are the Villages of Manhattan, Monee and Elwood left off this listing of communities in the study area?

2. Page 80, second paragraph: There is an ERROR message in the text of the report, stating that reference source not found.

3. Page 92: Reference is made to Wilmington-Peotone Road in the third bullet point under "Two-Lane Highways" and also in the last paragraph on this page. The map shows these locations to be Beecher-Peotone Road which lies between Beecher and Peotone and Indiana Avenue which lies in the Beecher Village limits east to the state line. In theory the road alignment is the same but the roadway changes names three times between Wilmington and the state line. The report should reference the proper road segments being discussed.

I just wanted you to know that someone does read these reports!

Robert O. Barber
Village Administrator
Village of Beecher
Phone: 708-946-2261
Fax: 708-946-3764

February 15, 2012

Mr. Robert O. Barber
Village Administrator
Village of Beecher
724 Penfield Street
PO Box 1154
Beecher, IL 60401

Dear Mr. Barber:

We have received your email of December 6, 2011 to Kesti Susinskas of IDOT and Edward Zak of HR Green, Inc. regarding your review of the Draft Illiana Corridor Purpose and Need Statement and Draft Transportation System Performance Report, both issued on December 1, 2011. Please accept our apologies for the delay in providing our reply. Following are your comments and our responses.

Draft Purpose and Need Statement:

Comment: On pages 7 and 8, Tables 1-1, 1-2, and 1-3: Do these population, employment and vehicle trip figures for 2040 include the South Suburban Airport? If so, under which airport scenario do you use for 2040, a full-build or some smaller airport configuration?

Response: The 2040 population and employment projections were developed assuming an Inaugural South Suburban Airport alternative featuring a single commercial runway, a 4-gate terminal, and a general aviation runway incorporating the existing Bult airport. This configuration of the South Suburban Airport is consistent with Chicago Metropolitan Agency for Planning's (CMAP) planning basis for its Go To 2040 Regional Plan.

Draft TSP Report:

Comment: On Table 3-2 on page 42, why are the Villages of Manhattan, Monee and Elwood left off this listing of communities in the study area?

Response: These communities, as well as Schererville and Merrillville in Indiana, were inadvertently left out of the population table. They will be added to the final report.

Comment: Page 80, second paragraph: There is an ERROR message in the text of the report, stating that reference source not found.

Response: *This formatting error referencing Table 4-13 will be corrected in the final report.*

Comment: Page 92: Reference is made to Wilmington-Peotone Road in the third bullet point under “Two-Lane Highways” and also in the last paragraph on this page. The map shows these locations to be Beecher-Peotone Road which lies between Beecher and Peotone and Indiana Avenue which lies in the Beecher Village limits east to the state line. In theory the road alignment is the same but the roadway changes names three times between Wilmington and the state line. The report should reference the proper road segments being discussed.

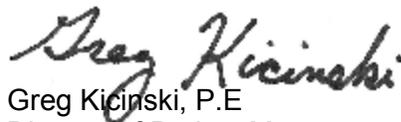
Response: *We will correct “Wilmington-Peotone Road” to “Beecher-Peotone Road” in the third dot point under “Two Lane Highways” as well as in the last paragraph on p. 92 in the final report. The IDOT Strategic Regional Arterial route generically known as “Wilmington-Peotone” is actually, as you point out, a combination of River Road, Wilmington-Peotone Road, and Beecher-Peotone Road, with jogs required at IL 53 and IL 50 to access the entire route.*

Thank you for your comments and assistance regarding our Study process. We look forward to your continued participation in our Study activities and again apologize for the delay in our reply. Please visit our website at www.illianacorridor.org for the most current information on the development of this project.

Sincerely,



Steve Schilke, P.E.
Consultant Studies Unit Head
Illiana Project Manager



Greg Kicinski, P.E.
Director of Project Management
Indiana Department of Transportation

From: Savko, Terry [<mailto:Terry.Savko@Illinois.gov>]
Sent: Friday, December 09, 2011 5:07 PM
To: Fuller, Matt (FHWA)
Subject: RE: ACTION: Illiana Corridor - Purpose and Need Statement for Review

Hi Matt,

I don't have a problem with concurrence for the Purpose and Need for the Illiana Corridor as it has been presented.

I do not plan on attending the 2 day mtg in Chicago; however, I will be available for the conference calls for those projects that have agricultural impacts. Many of the projects in **Dist 1** are done from safety standpoints and ag impacts are coordinated and appropriately addressed. I will continue to work with you to be sure that IDOA's concerns are being met.

Terry



Terry Savko, IL Dept of Agriculture
Bureau of Land and Water Resources
State Fairgrounds, Springfield, IL 62794-9281
217-785-4458 Fax 217-557-0993 terry.savko@illinois.gov

From: Matt.Fuller@dot.gov [<mailto:Matt.Fuller@dot.gov>]
Sent: Thursday, December 08, 2011 9:52 AM
To: Haaker, Anne; Heacock, Dan; Elizabeth.McCloskey@fws.gov; jdavis@dnr.in.gov; kathy.g.chernich@lrc02.usace.army.mil; westlake.kenneth@epa.gov; rmcahron@dnr.in.gov; Shawn.Cirton@fws.gov; Hamer, Steve; Savko, Terry; Laszewski.Virginia@epamail.epa.gov
Cc: Hine, Mike; dennis.bachman@dot.gov; JNEWLAND@dot.gov; Zyznieuski, Walter G; GKICINSKI@indot.IN.gov; BLAWRENCE@indot.IN.gov; Schilke, Steven E; Susinskas, Kesti P.; Kohler, Jon-Paul; Piland, Janis; Stevenson, Jerry
Subject: ACTION: Illiana Corridor - Purpose and Need Statement for Review
Importance: High

Good morning everyone,

I just wanted to touch base with you and make sure you had an opportunity to provide your availability for the NEPA-404 merger concurrence meeting for Illiana corridor Purpose and Need. You may enter your availability at the following website:

<http://whenisgood.net/wmmfswi>

Please submit a response by close of business on 12/9/2011. I will send out an appointment to all of the agencies early next week when the date and time is finalized. Thanks!

Matt

Good morning everyone –

The Purpose and Need statement for the Illiana Corridor-Tier 1 EIS is now available for review and is attached to this e-mail. The purpose and need statement references a supporting document, the Transportation System Performance Report, which is available online at the

following address (www.illianacorridor.org/information_center/library.aspx). Should you require a hard copy of either document, please let me know and the project team will provide you with a copy.

At this time, we are requesting the following actions from the resource agencies:

- 1. Identify a meeting date and time for the purpose and need concurrence point.**
- 2. Review of the purpose and need statement prior to the concurrence meeting.**

Please click on the following link to identify dates and times for the week of January 9, 2012 that will work for you (<http://whenisgood.net/wmmfswi>). **Please enter your availability by December 9, 2010.** The meeting we are arranging for the week of January 9th was postponed from the December 15, 2010 date that was previously scheduled. The new date will allow the agencies a full 30-days to review the purpose and need statement in advance of our request for concurrence.

As defined in the Illinois NEPA-404 merger agreement, concurrence is confirmation by an agency that (1) the information to date is sufficient for this stage [of project development], and (2) the project may proceed to the next stage of project development. The NEPA-404 merger agreement also states:

Concurrence does not imply an agency has endorsed the project or released its obligation to determine if the project meets statutory review criteria. Concurrence points will not be revisited unless there is new information or significant changes to the project, the environment, or laws and regulations which affect the concurrence point achieved.

We will plan to offer meeting locations in downtown Chicago and in downtown Indianapolis with the capability for others to participate remotely by phone and/or web conference. When identifying dates and times that work for you, please be sure to select the correct time zone for the location from which you will be participating. More details on meeting location and logistics will be provided when a date and time are finalized.

At the November 21, 2011 meeting, the project team also committed to make contact with the resource agencies in mid-December to gather preliminary thoughts and concerns with the purpose and need statement. Please anticipate a project team member making contact you within the next few weeks to get your preliminary view on the purpose and need statement.

Please let me know if you have any questions. Thanks!

Matt Fuller
Environmental Programs Engineer
Federal Highway Administration - Illinois Division Office
3250 Executive Park Drive
Springfield, IL 62563

From: Buffington, Matt [<mailto:MBuffington@dnr.IN.gov>]
Sent: Wednesday, December 14, 2011 1:34 PM
To: Fuller, Matt
Cc: Kicinski, Greg; Lawrence, Ben; Schilke, Steven E; Susinskas, Kesti P.; JNEWLAND@dot.gov; dennis.bachman@dot.gov; Hine, Mike
Subject: RE: ACTION: Illiana Corridor - Purpose and Need Statement for Review

As I mentioned, I'm still waiting to compare notes with Indiana Section 106/SHPO so the following are my initial notes.

- Page 6, Section 1.5. There is a stray ? in the first line. I am not clear if the statement made in the second sentence (starting "In addition, the Study Area is projected...") is true based on the information provided in this document. Page 10, 1.5.1.3 seems to suggest different information regarding employment. The tables on pages 7 and 8 lack the numbers for the study area in order to interpret population.
- Page 12 shows a much greater projected change in average daily traffic in Illinois compared to Indiana in the no build. I'm not sure if this means anything with this project but it might be something worth discussing how the new corridor would benefit both states even though Illinois may have more to gain in terms of reduced traffic.
- Looking at page 12 made me wonder if one route alternative would be to create routes on both sides of Midewin. I know this is not the purpose of the current request and there may be too many constraints, but if there was a way to have an east-west route that started on the north side of Midewin and then a spur that started on the south end, with both routes meeting somewhere to the east of Midewin, I would be curious what would occur. It may be cost prohibitive or have too many environmental impacts, I don't know. I also wondered if such a concept would allow 53 to be closed in the stretch next to Midewin.
- Finally, and perhaps even less substantive than the note above, if the last line of the first paragraph under 1.2 (page 1) is true, can I assume that if the corridor is built I will pay less for commodities that transport through this area?

Obviously, the comment about page 6 is the main concern at this point.

Matt Buffington
Environmental Supervisor
Division of Fish and Wildlife
IN Department of Natural Resources
402 W. Washington St., Room W273
Indianapolis, IN 46204

Phone: 317-233-4666
Fax: 317-232-8150
Email: mbuffington@dnr.in.gov
www.in.gov/dnr/fishwild/

From: Matt.Fuller@dot.gov [<mailto:Matt.Fuller@dot.gov>]
Sent: Friday, December 02, 2011 7:49 AM
To: Anne.Haaker@Illinois.gov; Carr, John; Dan.Heacock@illinois.gov; Elizabeth_McCloskey@fws.gov;

pelloso.elizabeth@epa.gov; Soren.G.Hall@usace.army.mil; john.g.betker@usace.army.mil; Davis, John; kathy.g.chernich@lrc02.usace.army.mil; westlake.kenneth@epa.gov; Buffington, Matt; CLARK METTLER, MARTHA; McAhron, Ron; Shawn_Cirton@fws.gov; steve.hamer@illinois.gov; terry.savko@illinois.gov; Laszewski.Virginia@epamail.epa.gov; West.Norman@epamail.epa.gov

Cc: Mike.Hine@dot.gov; dennis.bachman@dot.gov; JNEWLAND@dot.gov; Walter.Zyznieuski@illinois.gov; Kicinski, Greg; Lawrence, Ben; Steven.Schilke@illinois.gov; Kesti.Susinskas@Illinois.gov; Neel.Vanikar@dot.gov; Glenn.Harris@dot.gov; Jon-Paul.Kohler@dot.gov; Janis.Piland@dot.gov; Jerry.Stevenson@dot.gov

Subject: ACTION: Illiana Corridor - Purpose and Need Statement for Review

Importance: High

Good morning everyone – The Purpose and Need statement for the Illiana Corridor-Tier 1 EIS is now available for review and is attached to this e-mail. The purpose and need statement references a supporting document, the Transportation System Performance Report, which is available online at the following address (www.illianacorridor.org/information_center/library.aspx). Should you require a hard copy of either document, please let me know and the project team will provide you with a copy.

At this time, we are requesting the following actions from the resource agencies:

- 1. Identify a meeting date and time for the purpose and need concurrence point.**
- 2. Review of the purpose and need statement prior to the concurrence meeting.**

Please click on the following link to identify dates and times for the week of January 9, 2012 that will work for you (<http://whenisgood.net/wmmfswi>). Please enter your availability by December 9, 2010. The meeting we are arranging for the week of January 9th was postponed from the December 15, 2010 date that was previously scheduled. The new date will allow the agencies a full 30-days to review the purpose and need statement in advance of our request for concurrence.

As defined in the Illinois NEPA-404 merger agreement, concurrence is confirmation by an agency that (1) the information to date is sufficient for this stage [of project development], and (2) the project may proceed to the next stage of project development. The NEPA-404 merger agreement also states:

Concurrence does not imply an agency has endorsed the project or released its obligation to determine if the project meets statutory review criteria. Concurrence points will not be revisited unless there is new information or significant changes to the project, the environment, or laws and regulations which affect the concurrence point achieved.

We will plan to offer meeting locations in downtown Chicago and in downtown Indianapolis with the capability for others to participate remotely by phone and/or web conference. When identifying dates and times that work for you, please be sure to select the correct time zone for the location from which you will be participating. More details on meeting location and logistics will be provided when a date and time are finalized.

At the November 21, 2011 meeting, the project team also committed to make contact with the resource agencies in mid-December to gather preliminary thoughts and concerns with the purpose and need

statement. Please anticipate a project team member making contact you within the next few weeks to get your preliminary view on the purpose and need statement.

Please let me know if you have any questions. Thanks!

Matt Fuller
Environmental Programs Engineer
Federal Highway Administration - Illinois Division Office
3250 Executive Park Drive
Springfield, IL 62563

February 16, 2012

Mr. Matt Buffington
Environmental Supervisor
Division of Fish and Wildlife
IN Department of Natural Resources
402 W. Washington St., Room W273
Indianapolis, IN 46204

Dear Mr. Buffington:

We have received your email of December 14, 2011 to Matt Fuller of FHWA, in which you responded to his email of December 2, 2011 transmitting the Draft Purpose and Need Statement for review and comment. The Illinois Department of Transportation and Indiana Department of Transportation offer the following responses to the questions and concerns presented in your email.

Comment: Page 6, Section 1.5. There is a stray? in the first line. I am not clear if the statement made in the second sentence (starting "In addition, the Study Area is projected...") is true based on the information provided in this document. Page 10, 1.5.1.3 seems to suggest different information regarding employment. The tables on pages 7 and 8 lack the numbers for the study area in order to interpret population.

Response: *We will correct the stray question mark in the final version. Please refer to Tables 1-1, 1-2 and 1-7; the projected population and employment percentage growth rates for the Study Area from 2010 to 2040 are 176% and 225% respectively, which are much greater than the overall Region growth rates of 29% and 35% and the South Sub-Region growth rates of 49% and 72%. Numerically, the Study Area is projected to encompass 31% of the projected population growth of the larger South Sub-Region, even though it contains less than 9% of the South Sub-Region's population today. The larger growth rates are based on the greater availability of developable land, past growth trends, and independent market projections for regional growth. The tables on pages 7 and 8 (1-1 and 1-2) are associated with regional travel needs, while the table on page 11 (1-7) is associated with local travel needs; however, your point is taken that an easier comparison could be made if the tables were all combined together. The information on page 10, 1.5.1.3 illustrates that a greater proportion of workers in the South Sub-Region and especially the Study Area need to travel outside their local communities to their jobs than the average worker in the overall Region. The jobs to population imbalance will improve by 2040 in the Study Area and South Sub-Region, but not in enough proportion to overtake the effects of increased number of workers trying to access the "base" transportation system of 2040.*

Comment: Page 12 shows a much greater projected change in average daily traffic in Illinois compared to Indiana in the no build. I'm not sure if this means anything with this project but it might be something worth discussing how the new corridor would benefit both states even though Illinois may have more to gain in terms of reduced traffic.

Response: *Part of the reason you are noticing more changes in Illinois than Indiana on the ADT maps is that northwest Indiana in many respects is more "built out" and developed than comparable areas in Illinois within the study area, and in these areas there will be less projected change in 2040. Will County in Illinois is projected for greater population growth than Lake County in Indiana, although both will experience substantial growth by 2040. However, accessibility measures can be performed when alternatives are measured; often, the introduction of a new facility in a more dense area such as northwest Lake County can increase accessibility, both by allowing new ways to travel and by reducing demands on existing facilities. We realize there is interest in both states in producing equitable travel benefits and sharing of impacts, and will gear our future presentations accordingly.*

Comment: Looking at page 12 made me wonder if one route alternative would be to create routes on both sides of Midewin. I know this is not the purpose of the current request and there may be too many constraints, but if there was a way to have an east-west route that started on the north side of Midewin and then a spur that started on the south end, with both routes meeting somewhere to the east of Midewin, I would be curious what would occur. It may be cost prohibitive or have too many environmental impacts, I don't know. I also wondered if such a concept would allow 53 to be closed in the stretch next to Midewin.

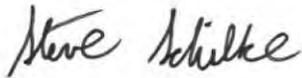
Response: *We are not aware of any proposals to close Illinois 53; it remains a significant route for local and short regional truck and automobile trips and is part of Historic Route 66. As far as creation of a double-ended transportation facility on the west end, we have received input from the trucking industry and others that dispersion of trips via different connection points would be a positive goal; however, financial viability will also play a part in the study, as well as nearby impacts to Midewin National Tallgrass Prairie and other sensitive environmental features.*

Comment: Finally, and perhaps even less substantive than the note above, if the last line of the first paragraph under 1.2 (page 1) is true, can I assume that if the corridor is built I will pay less for commodities that transport through this area?

Response: *The financial impact of a new transportation facility is yet to be determined through this process. In general, greater accessibility leads to greater options for movement of goods, and the ability to more flexibly price transportation services and the goods they carry. In some cases, prices to local consumers are not affected by decreased mobility so much as the loss of competitive advantage of local industries and transportation firms to other regions of the country and the world in the global economy.*

Again, we thank you for your comments and assistance regarding our Study process and we look forward to your continued participation in our Study activities. Please visit our website at www.illianacorridor.org for the most current information on the development of this project.

Sincerely,



Steve Schilke, P.E.
Consultant Studies Unit Head
Illiana Project Manager
Illinois Department of Transportation



Greg Kicinski, P.E.
Director of Project Management
Indiana Department of Transportation

cc: Matt Fuller

From: CLARK METTLER, MARTHA
Sent: Thursday, December 15, 2011 5:01 PM
To: Lawrence, Ben
Cc: RANDOLPH, JASON
Subject: RE: ACTION: Illiana Corridor - Purpose and Need Statement for Review

Ben:

We have reviewed the document and it appears you have justified purpose and need for this project. We do however have a question on the dollar figure used in justifying purpose and need. Specifically, you state in Section 1.5.2.3 that "This substantial increase in travel time will lead to economic loss with 15,000 hours of delay equivalent to \$113 million per year, assuming an average vehicle value of time of \$20.61/hour." Would you please clarify how this was calculated?

Thanks

From: Lawrence, Ben
Sent: Thursday, December 15, 2011 1:35 PM
To: CLARK METTLER, MARTHA; Carr, John
Cc: Susinskas, Kesti P.; Fuller, Matt; Kent Ahrenholtz; Kicinski, Greg; JNEWLAND@dot.gov
Subject: FW: ACTION: Illiana Corridor - Purpose and Need Statement for Review

Martha and John,

I'm just following up to see whether you've had a chance to review our Purpose and Need statement for the Illiana Corridor. Please let us know if we can provide additional information on the project or process to help with your review. Thanks for your help!

Ben Lawrence, PE
Environmental Policy Manager
Indiana Department of Transportation
317-233-1164

From: Matt.Fuller@dot.gov [<mailto:Matt.Fuller@dot.gov>]
Sent: Friday, December 02, 2011 7:49 AM
To: Anne.Haaker@Illinois.gov; Carr, John; Dan.Heacock@Illinois.gov; Elizabeth.McCloskey@fws.gov; pelloso.elizabeth@epa.gov; Soren.G.Hall@usace.army.mil; john.g.betker@usace.army.mil; Davis, John; kathy.g.chernich@lrc02.usace.army.mil; westlake.kenneth@epa.gov; Buffington, Matt; CLARK METTLER, MARTHA; McAhron, Ron; Shawn.Cirton@fws.gov; steve.hamer@illinois.gov; terry.savko@illinois.gov; Laszewski.Virginia@epamail.epa.gov; West.Norman@epamail.epa.gov
Cc: Mike.Hine@dot.gov; dennis.bachman@dot.gov; JNEWLAND@dot.gov; Walter.Zyznieuski@illinois.gov; Kicinski, Greg; Lawrence, Ben; Steven.Schilke@illinois.gov; Kesti.Susinskas@Illinois.gov; Neel.Vanikar@dot.gov; Glenn.Harris@dot.gov; Jon-Paul.Kohler@dot.gov; Janis.Piland@dot.gov;

Jerry.Stevenson@dot.gov

Subject: ACTION: Illiana Corridor - Purpose and Need Statement for Review

Importance: High

Good morning everyone – The Purpose and Need statement for the Illiana Corridor-Tier 1 EIS is now available for review and is attached to this e-mail. The purpose and need statement references a supporting document, the Transportation System Performance Report, which is available online at the following address (www.illianacorridor.org/information_center/library.aspx). Should you require a hard copy of either document, please let me know and the project team will provide you with a copy.

At this time, we are requesting the following actions from the resource agencies:

- 1. Identify a meeting date and time for the purpose and need concurrence point.**
- 2. Review of the purpose and need statement prior to the concurrence meeting.**

Please click on the following link to identify dates and times for the week of January 9, 2012 that will work for you (<http://whenisgood.net/wmmfswi>). Please enter your availability by December 9, 2010. The meeting we are arranging for the week of January 9th was postponed from the December 15, 2010 date that was previously scheduled. The new date will allow the agencies a full 30-days to review the purpose and need statement in advance of our request for concurrence.

As defined in the Illinois NEPA-404 merger agreement, concurrence is confirmation by an agency that (1) the information to date is sufficient for this stage [of project development], and (2) the project may proceed to the next stage of project development. The NEPA-404 merger agreement also states:

Concurrence does not imply an agency has endorsed the project or released its obligation to determine if the project meets statutory review criteria. Concurrence points will not be revisited unless there is new information or significant changes to the project, the environment, or laws and regulations which affect the concurrence point achieved.

We will plan to offer meeting locations in downtown Chicago and in downtown Indianapolis with the capability for others to participate remotely by phone and/or web conference. When identifying dates and times that work for you, please be sure to select the correct time zone for the location from which you will be participating. More details on meeting location and logistics will be provided when a date and time are finalized.

At the November 21, 2011 meeting, the project team also committed to make contact with the resource agencies in mid-December to gather preliminary thoughts and concerns with the purpose and need statement. Please anticipate a project team member making contact you within the next few weeks to get your preliminary view on the purpose and need statement.

Please let me know if you have any questions. Thanks!

Matt Fuller
Environmental Programs Engineer

Federal Highway Administration - Illinois Division Office
3250 Executive Park Drive
Springfield, IL 62563

From: RANDOLPH, JASON [<mailto:JRANDOLP@idem.IN.gov>]
Sent: Thursday, December 22, 2011 8:58 AM
To: Shimizu, Ronald A.
Subject: RE: ACTION: Illiana Corridor - Purpose and Need Statement for Review

Since the purpose and need will be carried forward through the NEPA process you should better clarify that paragraph. You should use that term "average daily number" in the document. As it is written it does not distinguish whether it is a daily number or an annual number.

Jason Randolph
IDEM-OWQ
317-233-0467

From: Shimizu, Ronald A. [<mailto:ShimizuR@pbworld.com>]
Sent: Monday, December 19, 2011 4:46 PM
To: CLARK METTLER, MARTHA; Lawrence, Ben; RANDOLPH, JASON
Cc: Powell, William (Rick); Wallace, Jeff; Thurman, Amy; Tracy Morse
Subject: RE: ACTION: Illiana Corridor - Purpose and Need Statement for Review

In response to your question, the 15,000 hours of delay is an average daily number. It was multiplied by 365 to get an annual number and then by the value of time \$20.61 to get the \$113 million per year figure.

Ron Shimizu
Vice President/Sr. Planning Manager
Parsons Brinckerhoff
230 W. Monroe, Suite 900
Chicago, IL 60606
312-803-6638 (office)
312-399-1106 (cell)

shimizur@pbworld.com

www.pbworld.com

From: CLARK METTLER, MARTHA [<mailto:MCLARK@idem.IN.gov>]
Sent: Monday, December 19, 2011 7:39 AM
To: Lawrence, Ben; RANDOLPH, JASON
Cc: Shimizu, Ronald A.; Powell, William (Rick)
Subject: RE: ACTION: Illiana Corridor - Purpose and Need Statement for Review

Yes, and please continue to copy Jason on the communications.

Martha Clark Mettler
Deputy Assistant Commissioner
Office of Water Quality
Indiana Department of Environmental Management

100 North Senate Avenue
MC 65-40 IGCN 1255
Indianapolis, IN 46204-2251
317-232-8402

From: Lawrence, Ben
Sent: Monday, December 19, 2011 8:35 AM
To: RANDOLPH, JASON
Cc: CLARK METTLER, MARTHA; Shimizu, Ronald A.; Powell, William (Rick)
Subject: RE: ACTION: Illiana Corridor - Purpose and Need Statement for Review

Oh I see- it's a question of the math, not the source of the rate. Thanks for clarifying.

Ben Lawrence, PE
Environmental Policy Manager
Indiana Department of Transportation
317-233-1164

From: RANDOLPH, JASON
Sent: Monday, December 19, 2011 8:31 AM
To: Lawrence, Ben
Cc: CLARK METTLER, MARTHA
Subject: RE: ACTION: Illiana Corridor - Purpose and Need Statement for Review

What we are specifically looking for is how they came up with a \$113 million figure from 15,000 hours at 20.61/hour.

Jason Randolph
IDEM-OWQ
317-233-0467



Chicago Metropolitan Agency for Planning

233 South Wacker Drive
Suite 800
Chicago, IL 60606
312-454-0400
www.cmap.illinois.gov

December 21, 2011

Via e-mail:

Kesti.Susinskas@illinois.gov

Mr. Kesti Susinskas
Illinois Department of Transportation (IDOT), Region 1
201 West Center Court
Schaumburg, Illinois 60196

Dear Mr. Susinskas:

While construction of the Illiana Corridor is not part of the fiscally constrained long-range plan for northeastern Illinois, funding for Phase I Engineering – the next step in the development of the project – is included within the fiscally constrained project list. The inclusion of the engineering costs in GO TO 2040, our regional plan, demonstrates the region’s support for its continued development.

CMAP’s major concern for the Illiana Expressway is one that is a common theme in transportation – how to pay for the facility. Assumptions regarding this project include some sort of tolling and possible public/private partnership. However, preliminary revenue projections indicate that the tolls necessary to make this a viable project would be significantly higher than on the rest of the current tollway system.

While that is not a topic for the project’s Purpose and Need Statement, CMAP believes a closer examination of the financial feasibility of the Illiana is warranted at the earliest possible time. To continue engineering on a project that cannot be built and maintained with reasonably available funding is not a prudent use of scarce resources.

SOCIO-ECONOMIC FORECASTS

CMAP staff has worked closely with the Department on this project, particularly regarding the population and employment forecasts that are being used in this study. For purposes of preparing revenue forecasts under market conditions, the Department is basing its demand forecasts on an alternative geographic distribution of households and jobs that departs from those assumed under GO TO 2040. While CMAP understands the reasons behind this, we are asking that demand forecasts for the project also

Board Members

- Gerald Bennett, Chair
- Frank Beal
- Alan Bennett
- Susan Campbell
- Roger Claar
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- Elliott Hartstein
- Al Larson
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- Raul Raymundo
- Rick Reinbold
- Rae Rupp Srch
- Dan Shea

Non-voting Member

- Leanne Redden

Executive Director

- Randy Blankenhorn

Mr. Kesti Susinskas
December 21, 2011
Page 2

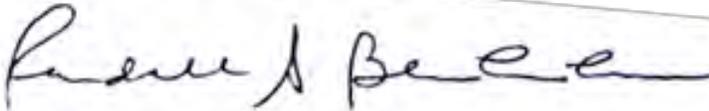
be prepared using GO TO 2040 assumptions to support current regional planning analyses and to remain consistent with requirements of the National Environmental Policy Act.

FREIGHT

CMAP supports the Purpose and Need Statement's consideration of freight issues within the corridor. We recognize that freight activity will be growing significantly in the future, particularly within the southern Cook County and northern Will County sub-region. Given the role of freight in this area and the issues identified within the Purpose and Need Statement, we would encourage the Department to consider the inclusion of truck-only lanes as alternatives are developed.

Thank you for the opportunity to comment on this Purpose and Need Statement.

Sincerely,

A handwritten signature in black ink, appearing to read "Randall S. Blankenhorn", enclosed within a thin black rectangular border.

Randall S. Blankenhorn
Executive Director

DK:RSB/stk

April 16, 2012

Mr. Randall S. Blankenhorn
Chicago Metropolitan Agency for Planning
233 South Wacker Drive
Suite 800
Chicago, IL 60606

Re: Purpose and Need Statement
Tier 1 Environmental Impact Statement
Illiana Corridor
Will and Kankakee Counties, Illinois and Lake County, Indiana

Dear Mr. Blankenhorn:

Reference is made to your December 21, 2011 letter regarding the Purpose and Need Statement and other current topics regarding the Illiana Corridor project.

Following are our responses:

Financing Considerations

Financial feasibility will be an early consideration in project development and we are currently working to establish traffic and revenue forecasting projections based on several tolling scenarios along selected "build" alternatives for the Illiana Corridor. These studies will help identify the financial feasibility of an Illiana Corridor project, as well as location issues that would ultimately affect the bottom line, and to identify the magnitude of "gap" funding, if required, to supplement tolling and other facility-based revenue sources. We anticipate initial results of these studies to be completed in spring 2012.

Socioeconomic Forecasts

Similar to other major NEPA studies and consistent with CMAP forecasting principles, a refined project level forecast is being developed. This is paramount for determining the transportation needs as precisely as possible, and for developing revenue forecasts that will determine the financial viability of the project. We will continue to work closely with CMAP on the refinement of these forecasts.

Truck Only Lanes

The benefits of such a facility must be assessed for addressing the freight needs, and balanced with the projected revenue or financing stream and the additional costs (if any) of such a facility.

April 16, 2012

Page 2

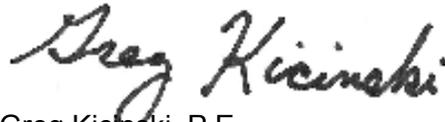
Tier 2 studies also offer the flexibility to further refine Tier 1 decisions, and the inclusion of P3 as a project development tool (independent of the recommended preferred alternative determination) offers the potential of additional developer-initiated concepts that could result in separation of truck and automobile traffic, or exclusive truck use, on the ultimate "build" facility.

Thank you for your comments and we look forward to CMAP's continued participation in this study.

Sincerely,



Diane O'Keefe, P.E.
Deputy Director of Highways
Illinois Department of Transportation



Greg Kicinski, P.E.
Director of Project Management
Indiana Department of Transportation



Division of Historic Preservation & Archaeology • 402 W. Washington Street, W274 • Indianapolis, IN 46204-2739
Phone 317-232-1646 • Fax 317-232-0693 • dhpa@dnr.IN.gov



December 29, 2011

Matt Fuller
Environmental Programs Engineer
Illinois Division Office
Federal Highway Administration
3250 Executive Park Drive
Springfield, Illinois 62563

Federal Agency: Federal Highway Administration ("FHWA")

Re: "Draft Purpose and Need Statement: Illiana Corridor Tier 1 Environmental Impact Statement" (December 1, 2011) (HPER-IL; INDOT Des. No. 1006456; DHPA No. 11913)

Dear Mr. Fuller:

Pursuant to the National Environmental Policy Act, Section 6002 of the Safe, Accountable, Flexible, and Efficient Transportation Equity Act, and Section 106 of the National Historic Preservation Act, the staff of the Indiana State Historic Preservation Officer ("Indiana SHPO") has reviewed the "Draft Purpose and Need Statement," which we received as an attachment to your December 2, 2011 e-mail message, in advance of January 13, 2012 NEPA-404 Merger Meeting regarding concurrence on the purpose and need of a possible project in the Illiana Corridor, which would be located in Lake County, Indiana and in Kankakee and Will counties, Illinois.

Your December 2 e-mail message stated, in reference to the Illinois NEPA-404 merger agreement, that "concurrence is confirmation by an agency that (1) the information to date is sufficient for this stage [of project development], and (2) the project may proceed to the next stage of project development."

The Indiana SHPO has no objection to the December 1, 2011 "Draft Purpose and Need Statement," from a historic preservation or archaeological perspective. However, the Indiana Department of Natural Resources might offer more specific comments regarding purpose and need, from the perspective of the Department's interest in the protection other kinds of resources.

If you have questions about issues pertaining to above-ground properties, such as buildings or structures, in Indiana, then please contact John Carr at (317) 233-1949 or jcarr@dnr.IN.gov. Questions about archaeological issues in Indiana should be directed to Dr. Rick Jones at (317) 233-0953 or rjones@dnr.IN.gov. In future correspondence regarding this project, please refer to DHPA No. 11913.

Very truly yours,

James A. Glass, Ph.D.
Deputy State Historic Preservation Officer

JAG:JLC:jlc

emc: Diane O'Keefe, P.E., Illinois Department of Transportation
Greg Kicinski, Indiana Department of Transportation
Kesti Susinskas, P.E., Illinois Department of Transportation PMC Project Manager
Matt Fuller, Illinois Division, Federal Highway Administration
Joyce Newland, Indiana Division, Federal Highway Administration
Laura Hilden, Indiana Department of Transportation

Ben Lawrence, P.E. Indiana Department of Transportation
Staffan Peterson, Ph.D., Indiana Department of Transportation
Mary Kennedy, Indiana Department of Transportation
Shaun Miller, Indiana Department of Transportation
Anuradha Kumar, Indiana Department of Transportation
Matt Coon, Ph.D., Indiana Department of Transportation
Melany Prather, Indiana Department of Transportation
Anne Haaker, Illinois Deputy State Historic Preservation Officer
Matt Buffington, Division of Fish and Wildlife, Indiana Department of Natural Resources
Kent Ahrenholtz, P.E., DLZ
Mcgan Lytle, Parsons Brinckerhoff

February 16, 2012

Mr. James A. Glass, PH.D.
Deputy State Historic Preservation Officer
Indiana Department of Natural Resources
Division of Historic Preservation & Archeology
402 W. Washington Street, W274
Indianapolis, IN 46204-2739

Reference: DHPA No. 11913

Dear Dr. Glass:

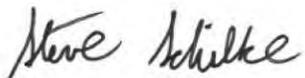
We have received your letter of December 29, 2011 to Matt Fuller of FHWA, in which you responded to his email of December 2, 2011 including an attached copy of the Illiana Corridor Draft Purpose and Need Statement for agency comment.

In your letter, you state the "Indiana SHPO has no objection" to the Purpose and Need Statement as far as archaeological or historical content is concerned. You also state that the Indiana DNR should be consulted for their comments or concurrence on the other regulatory areas under their purview as they relate to the Purpose and Need document.

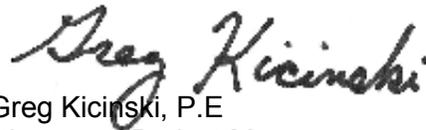
We interpret your comments as advance written concurrence of Indiana SHPO with the Purpose and Need Statement with the understanding you do not represent the remainder of Indiana DNR's interests which also will be consulted. We also offer you the opportunity to further verbalize your position, or to offer any other comments at the January 13, 2012 NEPA/404 Merger meetings to be held 10:00 AM CST (11:00 EST) jointly in Chicago at the Federal Transit Administration, and by teleconference in Indianapolis at the Federal Highway Administration.

Again, we thank you for your comments and assistance regarding our Study process and we look forward to your continued participation in our Study activities. Please visit our website at www.illianacorridor.org for the most current information on the development of this project.

Sincerely,



Steve Schilke, P.E.
Consultant Studies Unit Head
Illiana Project Manager



Greg Kicinski, P.E.
Director of Project Management
Indiana Department of Transportation



Indiana Department of Natural Resources

Mitchell E. Daniels, Jr., Governor
Robert E. Carter, Jr., Director
Environmental Unit
Division of Fish and Wildlife
402 W. Washington Street
Room W273
Indianapolis, IN 46204
Phone (317) 232-4080
Fax (317) 232-8150
www.in.gov/dnr/fishwild/

January 10, 2012

Matt Fuller
Environmental Programs Engineer
Federal Highway Administration - Illinois Division Office
3250 Executive Park Drive
Springfield, IL 62563

Re: Draft Purpose and Need Statement: Illiana Corridor Tier 1 Environmental Impact Statement

Dear Mr. Fuller:

This letter is in response to the "Draft Purpose and Need Statement," which was received as an attachment to your December 2, 2011, email. The Indiana Department of Natural Resources (DNR) has reviewed this draft document in advance of January 13, 2012, NEPA-404 Merger Meeting regarding concurrence of the purpose and need for a new east-west transportation route (the Illiana Corridor), which would be located in Lake County, Indiana and in Kankakee and Will counties, Illinois.

Your e-mail message stated, in reference to the Illinois NEPA-404 merger agreement, that "concurrence is confirmation by an agency that (1) the information to date is sufficient for this stage [of project development], and (2) the project may proceed to the next stage of project development."

The Indiana Department of Natural Resources, Division of Fish and Wildlife (DFW) concurs with the December 1, 2011, "Draft Purpose and Need Statement." For the most part, the document lacks specifics regarding impacts upon natural resources. The DNR expects to provide a wider range of comments as this project proceeds, particularly during the alternatives analysis. The DFW does request that in future documents, conclusions based on information from various sources are clearly explained within the document under review, and not buried within supportive documentation. This specifically relates to the information on pages 7 and 8 (tables 1-1, 1-2, and 1-3) and page 10 (1.5.1.3) which seems to be tied to information contained in the Transportation System Performance Report.

Please contact me at (317) 233-4666 if we can be of further assistance.

Sincerely,

Matt Buffington
Environmental Supervisor
Division of Fish and Wildlife

cc:

Greg Kicinski, Indiana Department of Transportation
Ben Lawrence, Indiana Department of Transportation
Steven Schilke, Illinois Department of Transportation
Kesti Susinskas, Illinois Department of Transportation

From: Norman West [<mailto:West.Norman@epamail.epa.gov>]

Sent: Wednesday, January 11, 2012 6:08 PM

To: Matt.Fuller@dot.gov; Anne.Haaker@Illinois.gov; JCarr@dnr.IN.gov; Dan.Heacock@illinois.gov; Elizabeth_McCloskey@fws.gov; Elizabeth Peloso; Soren.G.Hall@usace.army.mil; john.g.betker@usace.army.mil; jdavis@dnr.in.gov; kathy.g.chernich@lrc02.usace.army.mil; Kenneth Westlake; mclark@idem.in.gov; mbuffington@dnr.in.gov; rmcahron@dnr.in.gov; Shawn_Cirton@fws.gov; steve.hamer@illinois.gov; terry.savko@illinois.gov; Virginia Laszewski; Norman West; dennis.bachman@dot.gov; BLAWRENCE@indot.IN.gov; GKICINSKI@indot.IN.gov; Mike.Hine@dot.gov; JNEWLAND@dot.gov; Chris.Byars@dot.gov; Steven.Schilke@illinois.gov; Kesti.Susinskas@Illinois.gov; Walter.Zyznieuski@illinois.gov; Jon-Paul.Kohler@dot.gov; Janis.Piland@dot.gov; Jerry.Stevenson@dot.gov; Bernardo.Bustamante@dot.gov; Robin.Helmerichs@dot.gov; Kathy.G.Chernich@usace.army.mil; Powell, William (Rick); RANDY.FUCHS@aecom.com

Subject: Notice that EPA does not concur with the Illiana Corridor Purpose and Need

Dear Matt and Interested Parties,

This is FYI that EPA does not concur with the Illiana Corridor Tier I Purpose and Need:

- we do not concur with the three summary bullet points under Project Need as fully or clearly representing the underlying problems the purpose and need are to address
- we do not concur with the planning study area and reasonable termini.

Although the Transportation System Performance Report (TSP) is very good, the Purpose and Need Sections 1.5.1 through 1.5.3 subheadings are used in an initial alternatives analysis that seems to redefine the needs. We recommend and could concur with the current project build needs if identified as:

- to provide Will, Kankakee and Lake Counties with one or more major multimodal east-west transportation corridors that can sustain future transportation needs of the study area and the region
- to provide a bypass route for congested I-80 east-west traffic
- to provide for both currently anticipated and future potential local and regional freight transportation needs

EPA has actively participated in the Illiana Corridor Tier I scoping, and consistently raised concerns in these areas. Some good clarifications have been made in presentation materials, but the above concerns are not addressed by the distributed materials. We e-mailed the state project managers with our standing concerns on December 21, 2012, but are not aware of any changes to be considered at this Friday

meeting.

While the build horizon is 2040, we have recommended the project take advantage of the opportunity to plan beyond 2040 for multimodal transportation needs and open space connectivity in a sustainable way. That may take the form of creating a wider reserved corridor than may be required for the immediate Illiana Project right-of-way.

The current mandate is to build the corridor from I-65 to I-55, but we continue to recommend that use of these termini do not preclude alternatives that could eventually extend this corridor both east and west to at least reach I-80. The draft Purpose and Need statement does not clearly identify the I-80 congestion, both in the east segment where I-80 / I-94 join to where I-80 / I-294 diverge and in the west segment from Joliet through the I-80 / I-55 interchange, as a key problem, which is outside the study area. Additionally, the Purpose and Need Section 1.3 Study Area indicates developmental growth transportation needs but does not address rural agribusiness transportation needs of the study area.

We look forward to discussing these concerns again this Friday.

Norm West
NEPA Review

OECA, Region 5, E-19J 312-353-5692
U.S. EPA 312-408-2204 Fax
77 West Jackson Boulevard west.norman@epa.gov
Chicago, IL 60604

Subject: ACTION: Illiana - Purpose and Need Concurrence

Attachments: Illiana PN - Freight and Transit Memo.pdf; Illiana_Draft_PN-small.pdf; 2012-02-01 - Comments and Response to USEPA-PN.pdf

From: Matt.Fuller@dot.gov [mailto:Matt.Fuller@dot.gov]

Sent: Wednesday, February 01, 2012 6:48 AM

To: West.Norman@epamail.epa.gov; westlake.kenneth@epa.gov

Cc: Susinskas, Kesti P.; Schilke, Steven E; GKICINSKI@indot.IN.gov; BLAWRENCE@indot.IN.gov; Zyznieuski, Walter G; Stevens, Barbara H; Hine, Mike; dennis.bachman@dot.gov; Joyce.Newland@dot.gov; Jay.DuMontelle@dot.gov; Kohler, Jon-Paul; Piland, Janis; Stevenson, Jerry; shawn_cirton@fws.gov; Elizabeth_McCloskey@fws.gov; Kathy.G.Chernich@usace.army.mil; shawn_cirton@fws.gov

Subject: ACTION: Illiana - Purpose and Need Concurrence

Ken and Norm – Attached, please find a revised Purpose and Need statement for the Illiana Tier 1 Environmental Impact Statement (EIS), a technical memorandum supporting the freight and public transit analysis, and a disposition of the comments USEPA provided during and prior to the January 13, 2012 NEPA-404 Merger Meeting. The Purpose and Need statement has been revised based on discussions at the January 13, 2012 NEPA-404 Merger meeting and the changes are shown using “track changes” to make it easier to see the text that has been modified. The technical memorandum discussing freight and public transit was prepared to further substantiate the conclusions documented in the Purpose and Need and the Transportation System Performance Report.

The responses to USEPA’s comments have been prepared in collaboration with the Illinois Department of Transportation and the Indiana Department of Transportation, joint lead agencies for the project. The Federal Highway Administration hereby requests your concurrence with the Purpose and Need Statement for the Illiana Corridor Tier 1 EIS. The Purpose and Need statement satisfies FHWA and the Council on Environmental Quality’s regulatory requirements for a Purpose and Need statement. Additionally, the Purpose and Need provides the appropriate information necessary to proceed to the next stage of development, consistent with the Illinois NEPA-404 merger agreement.

We request your response no later than February 14, 2012. Please contact me by e-mail (Matt.Fuller@dot.gov) or by phone (217-492-4625) should you have any questions.

Sincerely,

Matt Fuller
Environmental Programs Engineer
FHWA-IL Division Office
Springfield, IL 62703

DRAFT Purpose and Need Statement

Illiana Corridor Tier 1 Environmental Impact Statement



Prepared for:

Illinois Department of Transportation and
Indiana Department of Transportation

January 10, 2012

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1.0 Purpose of and Need for Action

1.1 Purpose Statement

The purpose of the proposed action is to provide a transportation solution(s) that will improve regional mobility, address local system deficiencies, and provide for efficient movement of truck freight in the Study Area in a manner that complements regional transportation and economic development goals.

1.2 Project Background

The Illiana Corridor was first envisioned as a vital link of an outer encircling highway in the Chicago region in the early 1900s, and has since been studied in a number of forms over the last 40 years. Previous studies, described in the following paragraph, have indicated possible benefits from the development of an east-west transportation corridor extending from I-55 in Illinois to I-65 in Indiana. These benefits include providing an alternate route for motorists travelling the I-90/94 corridor; relieving traffic on the I-80 Borman/Kingery Expressway and U.S. 30; serving as a bypass for trucks around the congested metropolitan area highways; improving access to one of the largest intermodal freight areas in the U.S.; improving access to the proposed South Suburban Airport; supporting area economic development; and increasing the potential for substantial job creation. As traffic volumes on other highways in the region have increased, the associated congestion has resulted in travel delays with substantial economic impacts to industries that depend on the ability to efficiently move freight within and through the region.

In late 2006, the states of Indiana and Illinois, through their respective Departments of Transportation, entered into a bi-state agreement that provided a framework for further development of the Illiana Corridor. The Indiana Department of Transportation (INDOT), in cooperation with the Illinois Department of Transportation (IDOT) conducted the *Illiana Expressway Feasibility Study*¹, which was completed in June 2009. IDOT initiated two additional studies, the *Strategic Role of the Illiana Expressway*² (April 2010) and the *Illiana Expressway Economic Opportunities Analysis*³ (April 2010). Both studies investigated the economic and social benefits that could result from the proposed expressway in the south and southwestern portions of the Chicago region.

The *Illiana Expressway Feasibility Study* reached several conclusions that indicated positive effects of a new transportation facility between I-57 in Illinois and I-65 in

¹ Available at http://www.in.gov/indot/files/FR_INDOT_IllianaExpresswy_07-31-2009.pdf

² Available at <http://www.dot.state.il.us/Illiana/strategicrole.pdf>

³ Available at <http://www.dot.state.il.us/Illiana/finalreport.pdf>

Indiana on congestion relief on I-80 and US 30. Key benefits included improving traffic operations, providing regional economic benefits (including logistics and supply chain effects), improving freight mobility, improving transit linkages, and improving safety. The *Illiana Expressway Economic Opportunities Analysis* concluded that a new transportation facility between I-55 in Illinois and I-65 in Indiana could provide a new east-west connection as an alternative to the congested I-80 and produce substantial regional economic benefits over a 30 year period. These studies were useful in providing the basis for advancing the detailed environmental and engineering studies, of which this Purpose and Need statement is a part.

In addition, both states have passed legislation enabling public-private partnerships (P3) for the Illiana Corridor. The Public Private Agreements for the Illiana Expressway Act (Illinois Public Act 096-0913) and the Indiana Senate Enrolled Act No. 382 allow a collaborative planning effort for a “new fully access controlled interstate highway connecting Interstate Highway 55 in northeastern Illinois to Interstate Highway 65 in northwestern Indiana, which may be operated as a toll or non-toll facility.”⁴ The legislation allows the States to enter into P3s with one or more private entities to develop, finance, construct, manage, and/or operate a roadway connecting I-55 and I-65.

On June 9, 2010, Governors Pat Quinn of Illinois and Mitch Daniels of Indiana signed a Memorandum of Agreement (MOA) for a mutual commitment to the project by both states.

In April, 2011, IDOT and INDOT initiated the Illiana Corridor Tier 1 Environmental Impact Statement. To assist in the development of the environmental and engineering studies for the Illiana Corridor Tier 1 Environmental Impact Statement, a Context Sensitive Solutions approach has been established. Through this process, the public and stakeholders have provided input, and reviewed this purpose and need statement.

1.3 Study Area

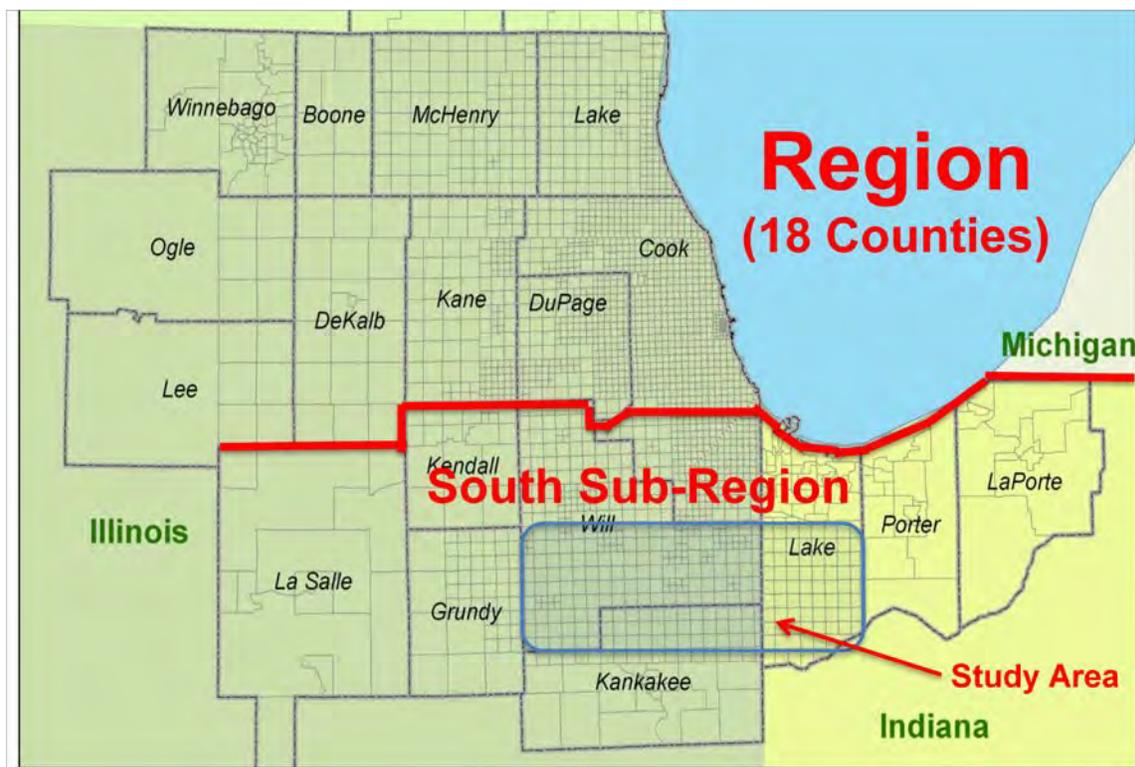
The northeast Illinois and northwest Indiana region is influenced by three key travel sectors, the Region, South Sub-Region, and Study Area. The greater Region (including 18 counties in Illinois and Indiana for purposes of this study) serves as a vital national link for inter-state and national transportation and commerce movement. The Region is also a key intermodal logistical area for transfer of rail, port, and truck freight between modes, which adds substantial trucking demand throughout the region. Portions of the Region are fully developed population centers having long-established and balanced functional classification roadway network. Other areas are not developed, but are projected to experience substantial population and employment gains, but lack the full

⁴ Illinois Public Act 096-913, Public Private Agreements for the Illiana Expressway Act

range of functional classification roadways. As the travel demands throughout the Region increase, the impact on performance and the corresponding needs are quite different due to the varying character of existing areas of the Region.

The South Sub-Region has been defined to include the 9-county area south of Lake Michigan, as shown in Figure 1-1. The South Sub-Region includes regional transportation facilities such as I-80, the Indiana Toll Road, and portions of I-55, I-57, and I-65. The northern portion of the South Sub-Region that includes I-80 is fully developed with limited infill opportunities. This area also has a long-established roadway system with a fully developed functional classification of roadways that includes a mix of interstates, other multi-lane highways, arterials, collectors and local streets.

Figure 1-1. Region and South Sub-Region Map



The roadways in the northern portion of the South Sub-Region are congested, and improvements are underway to address the congestion. With the recent rebuilding and capacity improvements to the I-80/94 Borman Expressway by INDOT, I-80 lane additions currently under construction by IDOT, and current studies on I-80 for additional capacity by IDOT, I-80 is projected to be expanded to its maximum capacity and is included as such in the “No Build” 2040 transportation network.

The southern portion of the South Sub-Region is less developed, and also includes the Illiana Study Area. The Illiana Study Area is shown in Figure 1-2. It is approximately 950 square miles in portions of southern Will County and northern Kankakee County in Illinois and southern Lake County in Indiana. The general location of the Study Area is between I-55 in Illinois on the west, I-65 in Indiana on the east, the areas south of U.S. 30 to the northern portion of Kankakee County in Illinois and the southern portion of Lake County in Indiana.

Figure 1-2. Study Area Map



The Study Area is projected to see greater population and employment growth than the South Sub-Region as a whole, and has a lesser balanced functional network with a lack of east-west interstates and multi-lane highways to handle growth demands than the more developed northern areas of the South Sub-Region. Additionally, existing and planned intermodal freight centers, and the bypass effects of the congested Chicago area of national freight demand, further strain the Study Area transportation network.

A line extending from approximately one mile south of Laraway Road in Illinois on the

west to U.S. 30 in Indiana on the east was determined as the northern boundary of the Study Area due to its location as the generally southern edge of developed land in the region. Much of the area to the north of this boundary is suburban or urban in character and served by a well-developed transportation system. The area south of the northern portions of the Study Area is more rural in nature, served by a lesser-developed transportation system, and poised for major population and employment growth in the near term. The southern boundary of the Study Area was selected to be north of the Kankakee-Bradley-Bourbonnais developed area, and to incorporate the southern portion of Lake County.

The eastern and western boundaries were developed to be consistent logical termini at I-55 in Illinois and I-65 in Indiana. Both I-55 and I-65 are rational end points because they are major north-south interstate routes that are major traffic generators, with I-55 connecting the Chicago region with Springfield, Illinois and St. Louis, Missouri, and I-65 connecting the northwestern Indiana metro region with Indianapolis, Indiana and Louisville, Kentucky. The distance between I-55 and I-65 is approximately 55 miles. Thus, the Study Area is broad enough to address environmental matters on a broad scope. Major north-south cross-roads in the Study Area include I-55, US-52, US-45, I-57, US-41, and I-65 that offer opportunities for regional mobility. To the west of I-55 and the Study Area, is Grundy County, which is a less developed county with a 2010 population of approximately 50,000 persons, and is mostly outside the metropolitan planning organization's jurisdiction. To the east of I-65 and the Study Area, the southern four townships in Porter County are primarily rural and have a 2010 population of approximately 24,000 persons. This proposed action will not restrict consideration of alternatives for other reasonably foreseeable transportation improvements west of I-55, or east of I-65.

1.4 Regional Planning Context

The jurisdictions of three metropolitan planning organizations extend over most of the Study Area: the Chicago Metropolitan Agency for Planning (CMAP), the Northwestern Indiana Regional Planning Commission (NIRPC), and the Kankakee Area Transportation Study (KATS). All three agencies have recently updated their long-range transportation plans to a 2040 planning horizon; accordingly, the Illiana Corridor EIS will use a 2040 planning horizon for consistency with these adopted regional plans.

The Illiana Corridor is described in the current 2040 long-range transportation plans of CMAP, NIRPC, and KATS. CMAP's GO TO 2040 Plan identifies the Illiana Corridor as an unfunded need and "supports initiating Phase 1 engineering for the project in order to narrow the scope to a few feasible alternatives, and recommends that these activities begin as a high priority." NIRPC's 2040 long-range transportation plan also included the Illiana Corridor as an unfunded need. The KATS adopted 2040 Long Range

Transportation Plan (May 2010) includes the Illiana Corridor as a solution to the problem of through trucks using Kankakee County as a connection between Illinois and Indiana. In addition, the Illiana Corridor Tiered Environmental Impact Statement is included in the Transportation Improvement Programs for CMAP and NIRPC.

Population and employment projections for the “no build” 2040 planning horizon were developed for the Study Area by the project study team. These projections are formed by the 2040 projections of the three regional planning agencies, and also include information from market-based projections suitable for design and revenue forecasting decisions that are based on past and current development trends, community land use and development plans, and private-sector growth forecasts. Other transportation agencies in the Region, including the Illinois State Toll Highway Authority, have used this market-based methodology to provide population and employment inputs to determine future travel demand for major project planning purposes. The Illiana Corridor Study has been coordinating with the regional planning agencies to ensure the methodology is appropriate for the purposes of this study.⁵

1.5 Project Need

As travel demands have increased in the South Sub-Region, travelers are seeking alternative routes in the less congested and less developed Study Area. In addition, the Study Area is projected to see substantially higher rates of growth in population and employment than the overall Region, or the South Sub-Region as a whole, in the “no build” 2040 scenario. As a consequence, travelers with east-west travel desires are contributing to north-south congestion, as well as I-80 congestion due to the lack of alternative east-west routes.⁶ I-80 is assumed to be built out to its maximum capacity in the no build 2040 scenario. The north-south feeder routes to I-80 are congested south of I-80. The Study Area does not have a complete functional classification road network, and the existing grid network of lower functional class roadways was historically developed primarily to serve its predominantly agricultural land use. Study Area land uses, however, are now transitioning in character from rural to suburban, especially in the northern portions.

The roads in this area are experiencing, and will continue to experience, a mismatch of vehicle trips and trip types using the lower functional classification roads. This is resulting in a number of travel performance deficiencies affecting regional and local travel as well as impeding the efficient movement of truck freight. For the Study Area to meet the regional, local, and freight demands, a more balanced functional transportation

⁵ Illiana Corridor Transportation System Performance Report, November 2011, available at http://www.illianacorridor.org/information_center/library.aspx

⁶ Illiana Corridor Transportation System Performance Report, November 2011

network is needed. The lower functional class roads are in place, but the longer distance high speed trips for autos and trucks are underserved due to a limited network of higher classification roads. As a result, lower classification roads are being utilized for these unintended purposes of serving longer distance and higher speed trips, creating a need for transportation system improvements.

A transportation system improvement(s) is needed in the Study Area to address the following needs:

1. Improve Regional Mobility
2. Address Local System Deficiencies
3. Provide for Efficient Movement of ~~Truck~~ Freight

These three principal needs were identified based on the analysis performed for the development of the *Transportation System Performance Report* and public and stakeholder input. This analysis included a comparison of 2010 and future 2040 baseline (No Build) transportation conditions in the region. It assumes the implementation of committed projects and those financially constrained major transportation projects included in the adopted long-range transportation plans, excluding any major improvement in the Study Area to address this purpose and need. A regional travel demand model was used to evaluate the transportation system performance of the full Region, South Sub-Region, with focus on the Study Area.

1.5.1 Improve Regional Mobility

“Improve regional mobility” addresses the need to develop a transportation system improvement that serves the projected growth in east-west traffic in the Study Area; reduces regional travel times; and improves access to jobs.

1.5.1.1 Address Projected Growth in Regional East-West Travel

Population forecasts developed for the region show strong growth over the next 30 years, as it continues to attract people and as residential patterns shift. Table 1-1 shows the estimated population growth for the 18-county Region in the regional travel model and the South Sub-Region, as shown in Figure 1-1. Projected population growth for the Region between 2010 and 2040 is 29 percent or over 3 million persons. For the South Sub-Region, population is expected to grow nearly 50 percent or 1.3 million persons between 2010 and 2040.

Table 1-1. Projected Population Growth

Area	2010 Population	2040 Population Projection	Change
Region	10,025,000	12,922,000	29%
South Sub-Region	2,635,000	3,933,000	49%

Source: The al Chalabi Group, 2011

As shown in Table 1-2, total employment for the Region is projected to grow substantially over the next 30 years. Forecasted growth between 2010 and 2040 is 35 percent with an employment gain of nearly 2 million jobs. The South Sub-Region, of which the Study Area is a part, is projected to increase in employment by over 70 percent by 2040. This is due in large measure to the expansion of the northeast Illinois and northwest Indiana region into areas of available land close to existing developed centers. Other contributing factors include the development of suburban centers across the region.

Table 1-2. Projected Employment Growth

Area	2010 Employment	2040 Employment Projection	Change
Region	5,664,000	7,626,000	35%
South Sub-Region	1,099,000	1,889,000	72%

Source: The al Chalabi Group, 2011

Major regional growth will also contribute to a substantial increase in vehicle trips between 2010 and 2040, as seen in Table 1-3.

Table 1-3. Projected Daily Vehicle Trips

Area	2010	2040	Change
Region	61,733,000	77,685,000	26%
South Sub-Region	14,224,000	19,323,000	36%

Source: Illiana Corridor Transportation System Performance Report, November 2011

Table 1-4 shows projected daily vehicle miles traveled within the Study Area in both the north-south and east-west directions. For north-south travel, projected 2040 vehicle miles traveled by all traffic will increase by more than 2.7 million miles, or 67 percent more than current 2010 conditions. The projection for east-west travel shows an even greater growth rate. By 2040, vehicle miles traveled in this direction are projected to increase by more than 2.5 million miles or 79 percent more than the existing 2010 condition. This equates to a total projected increase of 72 percent for the entire Study Area.

Table 1-4. Projected Daily Study Area Vehicle Miles Traveled by Direction

Direction	2010	2040	Change
North-South	4,046,700	6,753,400	67%
East-West	3,291,600	5,880,200	79%
Total	7,338,300	12,633,600	72%

Source: Illiana Corridor Transportation System Performance Report, November 2011

Figure 1-3 shows the change in total daily vehicle trips from 2010 to 2040, and illustrates

the overall desired travel patterns for the growth in all vehicles from various origin districts within and outside of the Study Area. East-west external vehicle trips through the South Sub-Region are projected to have strong growth as shown by the east-west wide red band in the center of the figure. These east-west through trips are expected to occur on higher functional classification facilities, such as I-80/94 and the Indiana Toll Road.

This exhibit reinforces the conclusion that there is strong vehicle trip demand growth for travel market destinations south of I-80. However, I-80/94 is currently the only east-west interstate highway option for meeting those travel desires.

Figure 1-3. Projected 2010-2040 Origin-Destination Growth in Vehicle Trips

1.5.1.2 Source: Illiana Corridor Transportation System Performance Report, November 2011
Reduce Regional Travel Delay/Improve Regional Travel Times

With the projected increases in traffic between 2010 and 2040, vehicle hours of travel (VHT) and hours of delay are expected to increase. Hours of delay are the amount of additional time spent traveling over free flow conditions. As shown in Table 1-5, VHT increases by 34 percent in the Region and by 53 percent in the South Sub-Region, while hours of delay increase by 46 percent for the Region and by 141 percent for the South Sub-Region. This results in trip time increases, economic impacts, and loss of jobs accessibility.

Table 1-5. Projected Change in Daily Vehicle Miles and Hours of Travel and Hours of Delay

Area	2010-2040 Change in VMT	Change	2010-2040 Change in VHT	Change	2010-2040 Change in Hours of Delay	Change
Region	56,125,600	31%	1,578,600	34%	219,100	46%
South Sub-Region	20,640,600	46%	526,800	53%	64,300	141%

Source: Illiana Corridor Transportation System Performance Report, November 2011

1.5.1.3 Improve Access to Jobs

The Study Area currently (2010) has a jobs-to-population ratio of 0.39 (or 39 jobs for every 100 residents) that is 32 percent less than the Region (0.57 jobs-to-population ratio), with the South Sub-Region jobs-to-population ratio 26 percent less than the Region. The Study Area jobs-to-population ratio is projected to improve by 2040 to 0.46, but it will still be 23 percent less than the Region’s projected 0.59 jobs-to-population ratio. This indicates that in general, the Study Area and South Sub-Region have more workers than jobs; so the area is a net exporter of workers.

Regional job accessibility from the Study Area is forecasted to decline between 2010 and 2040 because of increased congestion and travel times. As shown in Table 1-6, accessibility, measured in terms of 2010 and 2040 travel times to 2040 jobs (locations of all jobs that will exist in 2040), will decline for all trip durations between 2010 and 2040. For example, the accessibility to 2040 regional jobs for travel times less than or equal to 30 minutes from the Study Area shows that when using the 2010 highway network, 620,600 future (2040) jobs can be reached, and when using the more congested 2040 highway network, only 491,100 of these future (2040) jobs can be reached, a loss in accessibility of nearly 130,000 jobs or a 21 percent decline.

Table 1-6. Projected Accessibility to Forecast 2040 Jobs (From a centrally located zone in Study Area)

Locations	2010	2040	Accessible Jobs Change
Within 15 minutes	128,300	82,900	-45,400
Within 30 minutes	620,600	491,100	-129,500
Within 45 minutes	1,313,400	1,107,300	-206,100
Within 60 minutes	2,283,300	1,953,700	-329,600

Source: Illiana Corridor Transportation System Performance Report, November 2011

1.5.2 Address Local System Deficiencies

“Address local system deficiencies” focuses on the need to develop a transportation system improvement that serves the projected growth in local traffic, addresses the lack of

continuous higher functional classification east-west routes through the Study Area, and improves Study Area travel times/reduces delay.

1.5.2.1 Address Projected Growth in Local Traffic

Population forecasts developed for the Study Area show substantial growth in the next 30 years. Table 1-7 shows the estimated growth for the Study Area. Study Area population is expected to increase by 176 percent in the next 30 years, with a gain in population of over 411,000 residents. Also shown in Table 1-7 is the forecasted increase in employment over the next 30 years. Employment in the Study Area is projected to increase by 225 percent by 2040, with a gain in employment of over 207,000 jobs.

Table 1-7. Projected Study Area Population and Employment

	2010	2040	Change
Population	233,400	644,640	176%
Employment	92,070	299,470	225%

Source: The al Chalabi Group, 2011

Employment growth is projected to be the highest in the northern portions of the Study Area. The highest total employment concentrations will occur in Hobart and Crown Point in Indiana, and University Park, Monee, Manhattan, Joliet, and Beecher in Illinois.

Based on this forecasted increase in population and employment, total vehicle trips originating in or destined to the Study Area are projected to show a substantial increase of 126 percent between 2010 and 2040, as shown in Table 1-8. Local trips made entirely within the Study Area are projected to increase by 135 percent, while trips entering, leaving, or through the Study Area are projected to increase by 128 percent.

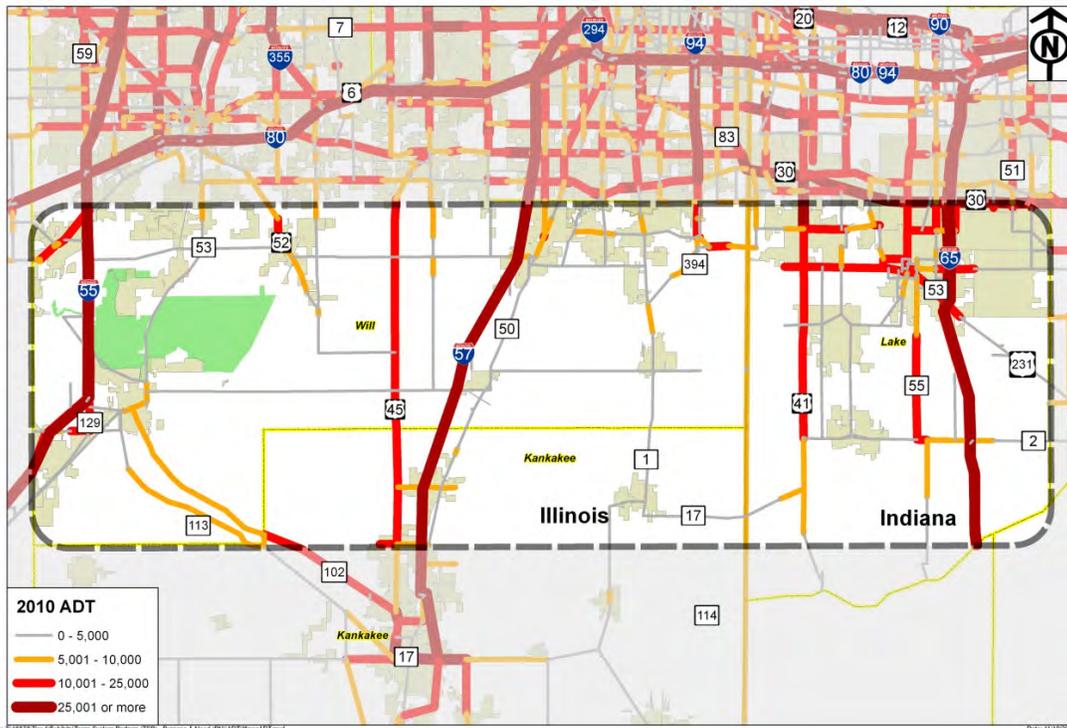
Table 1-8. Projected Daily Study Area Vehicle Trips

Travel Measure	2010	2040	Change
Total Vehicle Trips Originating in the Study Area	666,720	1,505,180	126%
Total Vehicle Trips Destined to the Study Area	663,000	1,495,180	126%
Total Vehicle Trips Within the Study Area	350,340	823,250	135%
Total Vehicle Trips Entering, Leaving and Through the Study Area	1,680,060	3,823,610	128%

Source: Illiana Corridor Transportation System Performance Report, November 2011

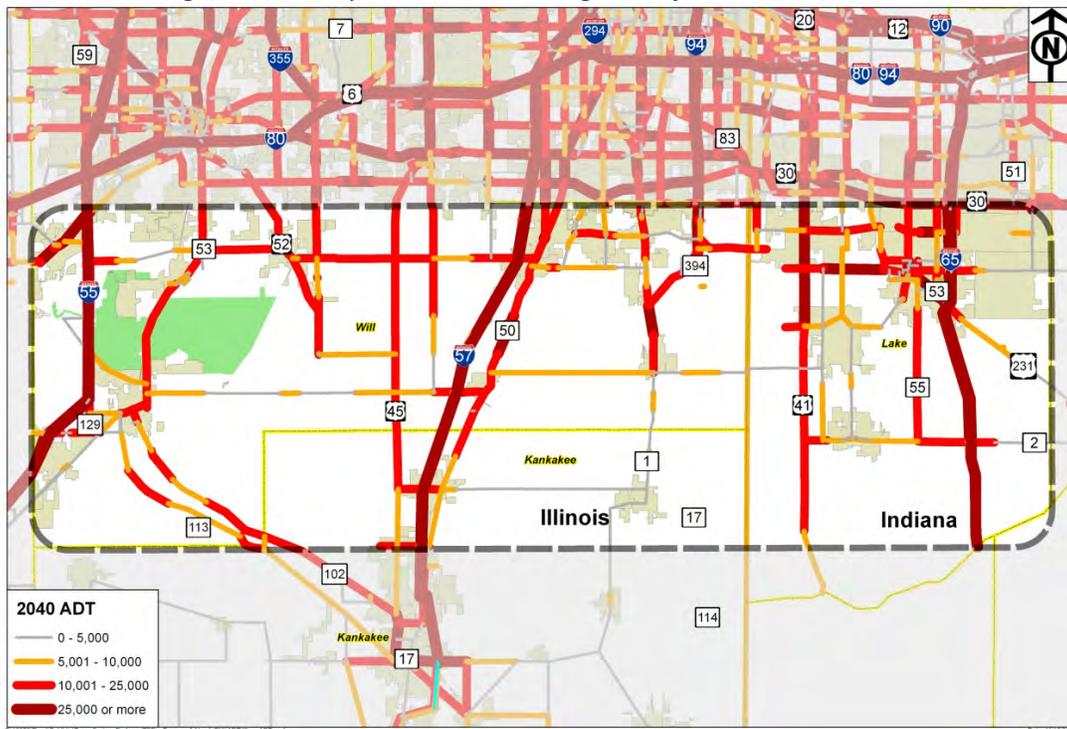
Average daily and forecasted traffic volumes within the Study Area are expected to increase substantially as shown in Figures 1-4 and 1-5. Between 2010 and 2040, increases

Figure 1-4. 2010 Average Daily Traffic



Source: Illiana Corridor Transportation System Performance Report, November 2011

Figure 1-5. Projected 2040 Average Daily Traffic (No Build)



Source: Illiana Corridor Transportation System Performance Report, November 2011

in ADT will be most pronounced in the northern half of the Study Area, and along the I-55, I-57, US-41 and I-65 corridors.

Table 1-9 provides a summary of forecasted growth by functional classification. Growth is expected to occur in the highest percentages on the lower-functional-classification rural roadways, and for principal arterials. The study area roadway network has an adequate number of collector and lower functional class roadways to accommodate this growth. Volumes along other principal arterials are projected to increase substantially, putting more strain on already congested facilities.

Table 1-9. Projected Study Area Growth in ADT by Functional Classification

Functional Classification	2010-2040 Change in ADT
Principal Arterial - Interstate	65%
Other Principal Arterial	124%
Minor Arterial	98%
Collectors, Locals	159%
Total	116%

Source: Illiana Corridor Transportation System Performance Report, November 2011

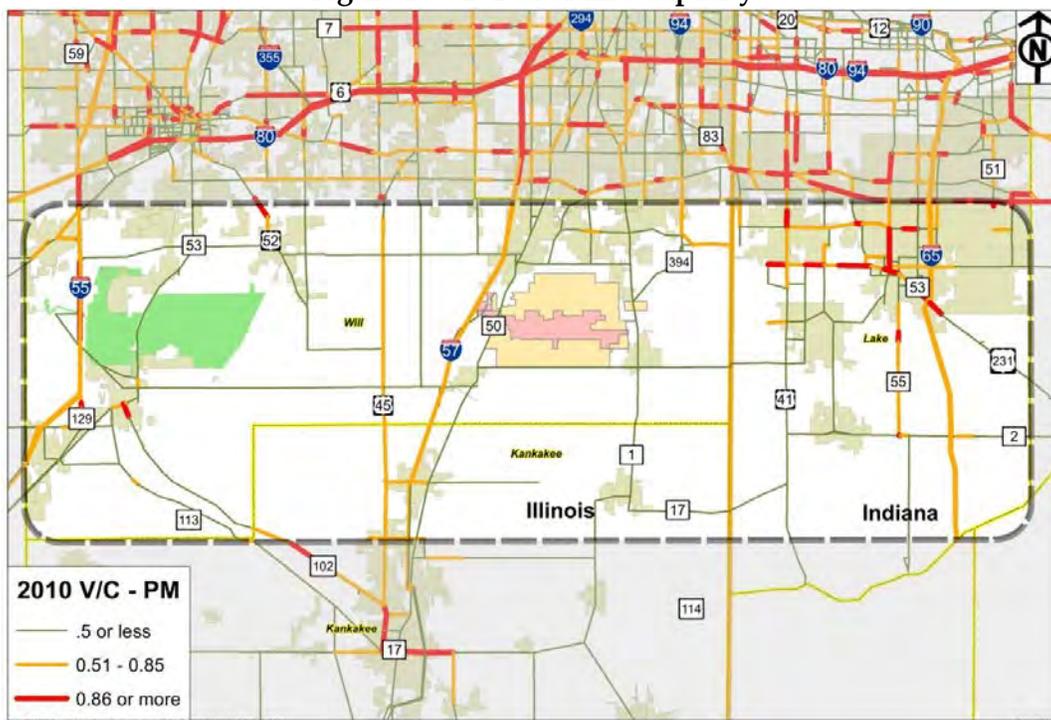
Forecasted traffic congestion in the Study Area is shown in volume to capacity (V/C) calculations performed for the project. Some of the current and projected congestion on north-south routes such as I-57, I-55 and I-65 in the study area can be attributed to longer distance regional traffic accessing I-80 in an out-of-direction pattern due to a lack of other available higher-classification east-west routes (see previous discussion in 1.5.1.1 and Figure 1-3). This condition adds travel and congestion onto the north-south access routes as travelers seek east-west alternatives to the lower functional classification routes in the study area.

V/C is a transportation congestion measure that represents the traffic volumes present to a roadway's ideal carrying capacity. V/C equal to one indicates a roadway is at its limit of carrying capacity. V/C is considered to be uncongested when it is 0.50 or less, approaching congestion when it is between 0.51 and 0.85, and congested when it is 0.86 or more.

With a few exceptions, the immediate Study Area is operating at V/C of 0.50 or less in its existing roadway network configuration and with 2010 volumes. However, the two main east-west roadways directly north of the Study Area, I-80/94 and US 30, both experience high levels of congestion currently.

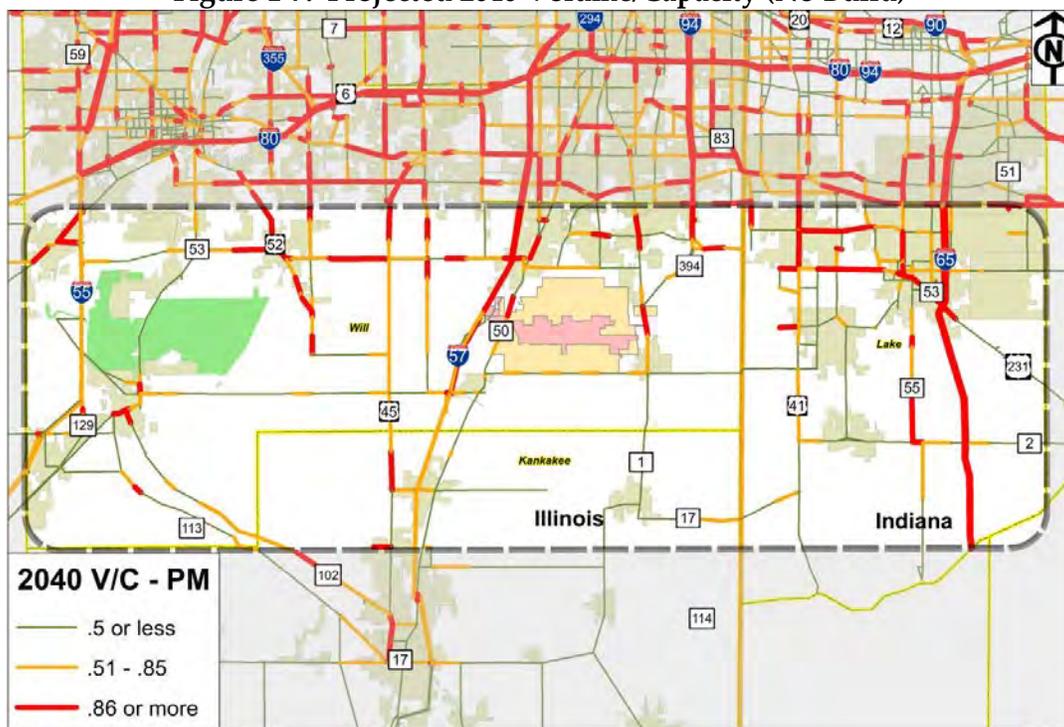
Figures 1-6 and 1-7 show 2010 and projected 2040 V/C for roadways in the Study Area. For I-80/94, this measure indicates "congested" for nearly all sections in 2010 as well as the 2040 No Build. For US 30, this measure indicates "approaching congestion" and

Figure 1-6. 2010 Volume/Capacity



Source: Illiana Corridor Transportation System Performance Report, November 2011

Figure 1-7. Projected 2040 Volume/Capacity (No Build)



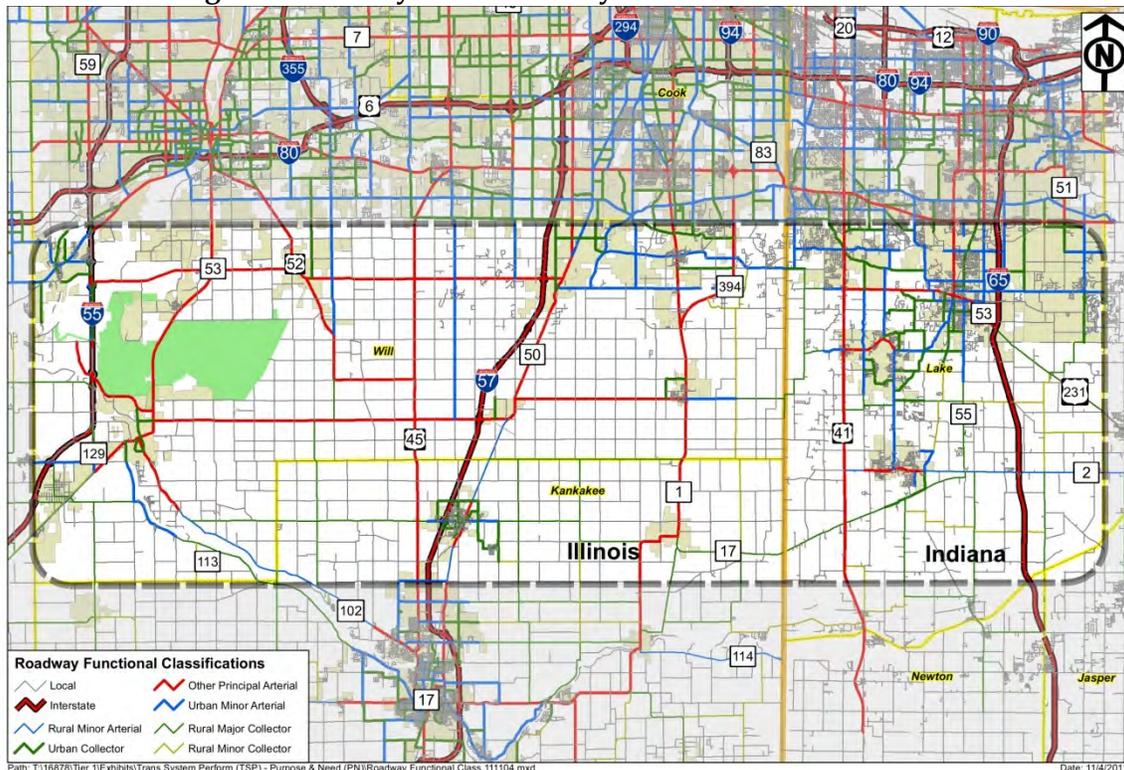
Source: Illiana Corridor Transportation System Performance Report, November 2011

“congested”, with increasing congested segments primarily east of I-57. Multilane and two-lane highways will also experience substantial deterioration in their operations. Congestion will be especially noticeable on principal arterials with additional segments having V/C ratios “approaching congestion” and “congested” in the year 2040.

1.5.2.2 Address Lack of Continuous Higher Functional Classification East-West Routes through the Study Area

There are limited east-west, higher functional class roads in the Study Area, as shown in Figure 1-8. Functional classification is the grouping of roads by the character of service they provide. This includes, in descending order of capacity, principal arterials (interstates, expressways, other principal arterials), minor arterials (urban and rural), collectors, and local roads.

Figure 1-8. Study Area Roadway Functional Classification



Source: Illiana Corridor Transportation System Performance Report, November 2011

There is also a lack of continuous east-west travel routes through the entire Study Area. The majority of east-west streets are not continuous across the state line between Illinois and Indiana. There are also natural features and federally protected lands in the Study Area, such as the Des Plaines and Kankakee rivers and the Midewin National Tallgrass Prairie located in the western portion of the Study Area, and West Creek and Cedar Lake in the eastern portion of the Study Area, which constrain options for east-west

travel. The proposed South Suburban Airport, for which IDOT is currently acquiring property, would result in east-west road closures.

To the immediate north of the Study Area, there is a well-developed roadway system with a balanced functional classification system. This includes interstate highways and other principal arterial highways in the east-west direction, including I-80/94, US-30, and US-6. However, I-80 is assumed to be built out to its maximum capacity in the 2040 no-build, and the Study Area proper contains no east-west interstate routes. The first available east-west interstate route south of I-80/94 is I-74, which is approximately 100 miles to the south. Manhattan-Monee Road and Peotone-Wilmington-Beecher Road are the main east-west other principal arterials in the Study Area and they are two-lane facilities that do not extend completely across the Study Area.

As seen in Table 1-10, there are only 141 east-west lane miles of other principal arterials in the Study Area. Given that the Study Area is a rectangle of more than 55 miles in the east-west direction and less than 20 miles in the north-south direction, there are a disproportionately small number of interstate and other principal arterial lane miles in the east-west direction compared to the north-south direction that will need to accommodate the projected growth in east-west travel shown in Figure 1-3. The Study Area has an adequate number of lower functional class routes in both directions.

Table 1-10. Study Area Lane Miles by Functional Classification

Functional Classification	North-South	East-West
Interstate	210	0
Other Principal Arterial	224	141
Minor Arterial (Urban)	76	123
Minor Arterial (Non-Urban)	33	24
Collector & Local (Urban & Non-Urban)	1,375	1,158
Total	1,914	1,445

Source: Illiana Corridor Transportation System Performance Report, November 2011

The lack of available east-west interstate and other principal arterial routes in the Study Area forces some trips having an east-west destination to first travel north to I-80, the nearest east-west interstate highway. This is contributing to the congestion on the north-south arterial routes that access I-80. The lack of continuous higher functional class east-west routes limits travel route options causing adverse travel that adds economic cost, delay, congestion, reduced job accessibility, and a mismatch of trip type with appropriate routes.

1.5.2.3 Reduce Local Travel Delay/Improve Local Travel Times

With the projected increases in traffic between 2010 and 2040, vehicle miles of travel (VMT), vehicle hours of travel (VHT) and hours of delay within the Study Area are all projected to increase substantially. VHT is the total time spent traveling by all vehicles on

the roadway network. Vehicle hours of delay are the increased time spent traveling over free flow conditions. As shown in Table 1-11, VMT increases by 72 percent from 2010-2040, VHT increases by 84 percent and hours of delay increases by over 200 percent of the current condition. This substantial increase in travel time will lead to economic loss with 15,000 hours of daily delay in 2040, which is equivalent to \$113 million annually, assuming an average vehicle value of time of \$20.61/hour.⁷

Table 1-11. Projected Daily Study Area Vehicle Hours of Travel and Hours of Delay

Congestion Measure	2010	2040	Change
Vehicle Miles of Travel (VMT)	7,338,000	12,634,000	72%
Vehicle Hours of Travel (VHT)	177,200	326,000	84%
Hours of Delay	4,900	15,000	206%

Source: Illiana Corridor Transportation System Performance Report, November 2011

1.5.3 Provide for Efficient Movement of ~~Truck~~ Freight

To sustain its role as a vital national link for national commerce movement, and address the growing travel demands of intermodal transfer activity, the transportation system must meet the need for efficient movement of ~~truck~~ freight. “Provide for efficient movement of freight” focuses on the need to improve the accessibility of freight movement to and from its distribution points throughout the region, and provide more efficient truck freight movement on the roadway network.

1.5.3.1 Improve Accessibility for Freight Facilities

The northeast Illinois and northwest Indiana region serves as a freight transportation center for the country. The movement of freight is critical to both the national and regional economies. In the Chicago region, trucks carry about 1.5 billion tons of freight annually and rail carries 631 million tons⁸.

As seen in Table 1-12, truck hours of travel (THT) are projected to increase for both the Region and South-Sub-Region, with the Study Area showing over 80 percent growth by 2040. The Study Area growth in truck hours of travel is expected to increase at a faster rate than the South Sub-Region and Region. This is due to the Study Area having a higher growth rate in truck trips and congestion. Similarly, truck hours of delay are shown in this table, with substantial 2010 to 2040 growth, especially for the South Sub-Region and Study Area, which grow at 324 percent and 442 percent, respectively.

⁷ NCHRP Report 456 Guidebook for Assessing the Social and Economic Effects of Transportation Projects

⁸ CMAP website, <http://www.cmap.illinois.gov/2040/freight-system>

Table 1-12. Projected Daily Truck Hours Traveled and Truck Hours of Delay

Area	2010 THT	2040 THT	Change	2010 Truck Hrs of Delay	2040 Truck Hrs of Delay	Change
Region	286,400	433,600	51%	55,860	113,900	111%
South Sub-Region	90,900	155,000	70%	5,890	25,000	324%
Study Area	15,700	28,400	81%	480	2,600	442%

Source: Illiana Corridor Transportation System Performance Report, November 2011

This table shows the added travel time and delay time that will be faced by trucks in the Study Area and South Sub-Region due to the increased future congestion, resulting in diminished accessibility and economic loss. The 2,600 hours of daily truck delay in 2040 translates to nearly \$34 million annually, assuming \$35.73/truck vehicle hour as a value of time.⁹

The Study Area includes a number of existing and planned freight transportation facilities, as shown in Figure 1-9. In particular, there are several large freight facilities that exist or are proposed for the Study Area. These include the existing CenterPoint Intermodal Center in Elwood, Illinois; the existing CenterPoint Global IV Intermodal Center in Joliet, Illinois; the proposed RidgePort Logistics Center in Wilmington, Illinois; and the proposed CenterPoint Intermodal Center in Crete, Illinois, which are rail-truck intermodal transfer facilities with additional existing and proposed logistics/warehousing businesses in the immediate vicinity of each facility. The two existing intermodal centers in Elwood and Joliet handled more container units in 2008 (3,000,000 twenty-foot equivalent units, or approximately 1.5 million trucks) than any comparable land-based facility, and all but 3 of the largest coastal ports in the U.S.¹⁰ These existing and proposed facilities are projected to account for 47,000 daily truck movements by 2040. In addition, the proposed South Suburban Airport is expected to include a freight cargo facility.

⁹ NCHRP Report 456 Guidebook for Assessing the Social and Economic Effects of Transportation Projects

¹⁰ "Inland Port Impact Study", Will County Center for Economic Development, September 2010.

Figure 1-9. Existing and Planned Freight Facilities

Source: Illiana Corridor Transportation System Performance Report, November 2011

1.5.3.2 Provide More Efficient Freight Movement

Between 2010 and 2040, truck volumes are forecasted for a substantial increase in the South Sub-Region and in the Study Area. Table 1-13 shows the projected growth of 47 percent in truck trips between 2010 and 2040 for the South Sub-Region and 193 percent growth in the Study Area. Figures 1-10 and 1-11 show 2010 and projected 2040 truck ADT for the Study Area.

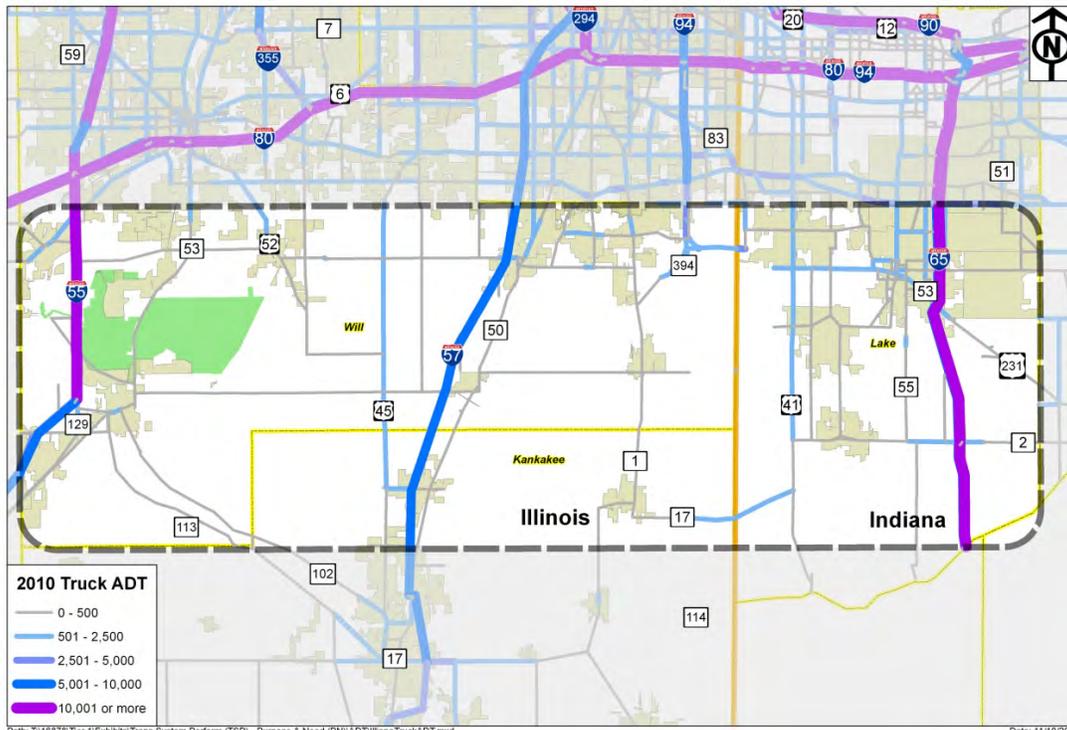
Table 1.13. Projected Daily Truck Trips

Area	2010	2040	Change
Region	3,850,200	5,223,400	36%
South Sub-Region	824,900	1,340,900	63%
Study Area	87,800	257,100	193%

Source: Illiana Corridor Transportation System Performance Report, November 2011

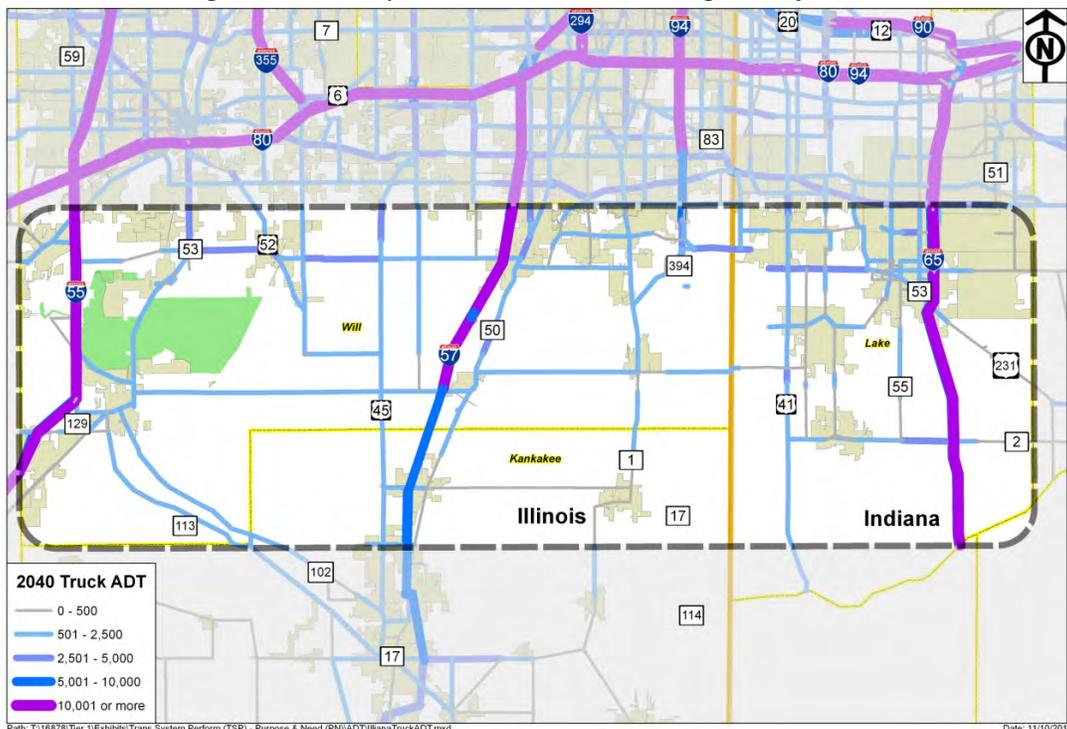
It is more difficult to isolate and identify rail freight traffic growth through the Study Area. However, a 2007 national rail study indicated that rail freight tonnage demand in the U.S. will increase by 88 percent from 2004 to 2035 (to over 4 billion tons/year) and that a corresponding increase in rail freight traffic will result. In particular, the

Figure 1-10. 2010 Truck Average Daily Traffic



Source: Illiana Corridor Transportation System Performance Report, November 2011

Figure 1-11. Projected 2040 Truck Average Daily Traffic



Source: Illiana Corridor Transportation System Performance Report, November 2011

Burlington Northern Santa Fe (BNSF) railroad line through the far western part of the Study Area (serving the CenterPoint Elwood and proposed RidgePort intermodal facilities) has an anticipated 80-200 trains/day traffic growth and the CSX/Union Pacific (UP) railroad line through the Study Area (serving the proposed Crete intermodal facility) has an anticipated 30-80 trains/day traffic growth, from 2004 to 2035.¹¹

The primary freight rail capacity deficiency identified by the study is on the western UP line through the Study Area (serving the Global IV intermodal facility in Joliet). The opening of this facility in 2010, along with the proposed introduction of high speed intercity passenger rail service from Chicago to St. Louis, requires rail infrastructure improvements in order to allow fluid operation of 110 mph passenger service. \$1.2 billion in federal funds have been identified for the Chicago-St. Louis high speed rail line to date, and additional studies are underway to address the provision of the required operating capacity for these services¹². No other freight rail capacity issues within the Study Area have been identified, either by interviews with the individual railroads or by research of available freight railroad information. North of the Study Area, the Chicago Region Environmental and Transportation Efficiency (CREATE) program and capacity improvements by the Class 1 railroads are improving rail capacity issues, primarily within Chicago and the immediate surrounding area¹³.

~~While rail capacity improvements are being performed by the individual railroads and CREATE, the resulting~~ increase in truck freight demand creates mobility needs that have not been addressed. Total truck trips originating in or destined to the Study Area are projected to increase by 186 and 185 percent respectively between 2010 and 2040, as shown in Table 1-14. Local trips made entirely within the Study Area are projected to increase by 228 percent, while trips entering, leaving, or through the Study Area are projected to increase by 193 percent. This projected increase in Study Area vehicle trips greatly exceeds the projected 36 percent increase in total truck trips for the entire region.

Table 1-14. Projected Daily Study Area Truck Trips

Travel Measure	2010	2040	Change
Total Truck Trips Originating in the Study Area	36,870	105,520	186%
Total Truck Trips Destined to the Study Area	36,560	104,320	185%
Total Truck Trips Within Study Area	14,410	47,220	228%
Total Truck Trips Entering, Leaving and Through the Study Area	87,840	257,070	193%

Source: Illiana Corridor Transportation System Performance Report, November 2011

¹¹ National Rail Freight Infrastructure Capacity and Investment Study, AAR, 2007

¹² Illinois High Speed Rail website: <http://www.idothsr.org>

¹³ CREATE website: <http://www.createprogram.org>

Truck vehicle miles traveled within the Study Area in both north-south and east-west directions are shown in Table 1-15. For north-south travel, projected miles traveled by truck traffic each day will increase by more than 425,000 miles from 2010 to 2040, a 60 percent increase. Even greater is the projection for east-west truck travel. By 2040, truck miles traveled in this orientation are projected to increase by nearly 578,000 miles or 106 percent more than the existing 2010 condition. This equates to a total projected increase in VMT of 80 percent for the entire Study Area.

Table 1-15. Projected Daily Study Area Truck Vehicle Miles Traveled

Direction	2010 Truck VMT	2040 Truck VMT	Change
East-West	547,300	1,124,900	106%
North-South	705,800	1,131,800	60%
Total	1,253,100	2,256,700	80%

Source: Illiana Corridor Transportation System Performance Report, November 2011

Figure 1-12 shows the change in truck volumes from 2010 to 2040, and illustrates the overall desired travel patterns for multi-unit trucks from various origin districts within and outside of the Study Area. Truck volumes are expected to grow from the southern part of Will County to the northern part of Will County and to Cook County, including demand growth for east-west as well as north-south truck travel within the Study Area. This exhibit reinforces the conclusion that trucks have market destinations south of I-80, but I-80/94 is currently the only east-west interstate highway option for meeting those travel desires.

Figure 1-12. Projected 2010-2040 Origin-Destination Growth in Truck Trips

Source: Illiana Corridor Transportation System Performance Report, November 2011

Memorandum

To: NEPA/404 Merger Team
From: Steve Schilke, IDOT Project Manager
Date: January 25, 2012

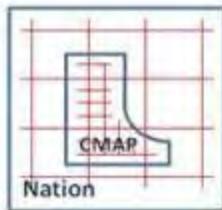
This technical memorandum has been prepared to provide additional background on development of the Draft Purpose and Need Statement (P&N) for the Illiana Corridor Tier One EIS. Specifically, this document will provide supporting information regarding the freight analysis and public transit analysis, and the conclusion that freight railroad and fixed guideway transit needs were not supported as specific need points.

The project team collected extensive data, developed sophisticated travel models, met with numerous stakeholders, and reviewed several existing reports in the preparation of the Transportation System Performance Report¹, which formed the basis for the development of the P&N. Summarized below, is a description of our freight travel modeling that included an extensive national analysis of freight movement, and our specific analysis regarding freight railroad and fixed guideway transit needs .

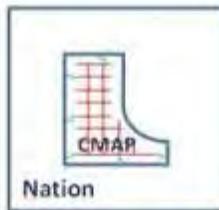
Freight Travel Modeling

As part of the preparation of the Transportation System Performance (TSP) Report, significant effort was expended to understand freight movement in the Study Area and throughout the Region. The freight component of the travel forecasting model for this project was developed using a three-level approach – national, Chicago Metropolitan Agency for Planning (CMAP) model area, and the Illiana Study Area, providing a different level of detail in each level that is most appropriate for the different travel markets.

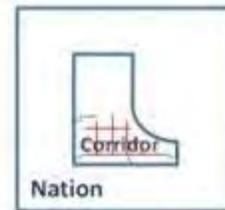
Level I: National



Level II: CMAP



Level III: Illiana



Long-distance truck trips are generated from commodity flow data provided by the Federal Highway Administration in the Freight Analysis Framework (FAF). The simulated truck

¹ Illiana Corridor Transportation System Performance Report, November 2011, available at http://www.illianacorridor.org/information_center/library.aspx

trips cover North America to account for all relevant trucks trips of 50 miles or more. Trips that are internal to CMAP are included as long as they have a distance of 50 miles or more.

The third generation of the FAF data, called FAF³, was released in summer 2010 and contains flows between 123 domestic FAF regions and 8 international FAF regions. FAF³ data provide commodity flows in tons and dollars by:

- FAF zones (123 domestic + 8 international zones)
- Mode (7 types)
- Standard Classification of Transported Goods (SCTG) commodity (43 types)
- Port of entry/exit for international flows (i.e. border crossing, seaport or airport)

The base year is 2007, and freight flow forecasts are provided for the years 2015 to 2040 in five-year increments.

The FAF data contain different modes and mode combinations. For the Illiana project, the freight modes of truck, rail, water and air were analyzed. The remaining modes that are included in the FAF, such as "multiple modes & mail," as well as other and unknown, provide insufficient information to be included, and goods shipped by pipeline commonly travel without being loaded on trucks.

As the region is a major hub for freight transportation, distribution centers and intermodal transfer stations are represented in the freight model. Distribution centers and intermodal transfer stations were included with these attributes:

- Location (as CMAP zone number)
- Modes served (trucks, rail, water or air)
- Size of facility

Further data required for the truck model included the Vehicle Inventory and Use Survey (VIUS) that was performed for the last time in 2002. The U.S. Census publishes the data with survey records of trucks and their usage². Finally, population and employment data are used for FAF³ data disaggregation, and truck counts are used to validate the model.

The resolution of the FAF data with 123 zones within the U.S. is too coarse to analyze freight flows on the Illiana corridor. A method has been developed to disaggregate freight flows from FAF zones to counties and further to CMAP zones. First, the FAF³ data are disaggregated to counties across the entire U.S. using total employment in each county. Within the CMAP model area, more detailed employment is used to further disaggregate to zones. Finally, commodity flows in tons are converted into truck trips using average payload factors.

² <http://www.census.gov/svsd/www/vius/products.html>

Output of this module is a truck trip table from all 6,090 zones to all 6,090 for two truck types, single-unit trucks and multi-unit trucks.

Disaggregation and Aggregation of Freight Flows



This region is a major freight transportation hub for North America. As such, a large number of distribution centers and intermodal transfer centers serve long-distance freight flows by truck, rail, water and air. As there are significant existing and planned freight facilities in the Illiana Study Area, it is important to reflect freight flows generated by these facilities in the freight model.

The figure below depicts such flows. Long-distance trips are routed through distribution centers, and short-distance trucks pick up goods from distribution centers and deliver them to destinations in the region. The same concept is applied with flows by rail, water or air that enter the CMAP model area. Short-distance trucks pick up goods at rail yards, ports and airports and deliver them to their final destinations.



Long-distance Truck Flows Traveling Through Distribution Centers

It is important to note that truck trips are only routed through distribution centers if they enter the CMAP model area (External-Internal). A flow from Chicago to other regions is

expected not to travel through a distribution center. A local manufacturing firm would not use a distribution center to deliver their goods, but rather long-distance trucks pick up the goods at the manufacturing firm. Flows by rail, water or air use intermodal facilities for both directions (External-Internal and Internal-External), as only very few firms have direct on-site access to these modes.

While intermodal facilities are used for all commodities that enter or leave the CMAP model area by rail, water or air, distribution centers are only used for selected incoming truck flows. Distribution centers are mostly used for smaller scale items in large quantities, such as food or clothing. Larger goods, such as machinery, do not travel through distribution centers, but rather are sent to their final destination directly by the long-distance truck. Building materials, as another example, commonly are shipped to the building site without going through a distribution center either. Mostly, distribution centers are used for retail goods, such as food, paper, or consumer electronics.

The table below provides an overview of the use of distribution centers and intermodal facilities. The first block shows inbound trips and the second block shows outbound trips. Each block lists the four modes: truck, rail, water and air, and the long-distance and short-distance truck flows are specified.

Use of Distribution and Intermodal Facilities

Direction	Mode	Long-Distance	Short-Distance
Inbound to Chicago region (External to Internal)	Truck	Long-distance truck trip ends at distribution center*	Goods are shipped on smaller trucks from distribution center to final destination within CMAP region
	Rail	Long-distance rail trip ends at intermodal facility (or rail yard)	Goods are shipped on smaller trucks from rail yard to final destination within CMAP region
	Water	Long-distance water trip ends at port	Goods are shipped on smaller trucks from port to final destination within CMAP region
	Air	Long-distance air trip ends at airport	Goods are shipped on smaller trucks from airport to final destination within CMAP region
Outbound from Chicago region (Internal to External)	Truck	Long-distance truck trip travels from CMAP origin to external destination without use of distribution center	None
	Rail	Long-distance rail trip travels from rail yard to external destination	Goods are shipped on smaller trucks from origin in CMAP region to rail yard
	Water	Long-distance water trip travels from port to external destination	Goods are shipped on smaller trucks from origin in CMAP region to port
	Air	Long-distance air trip travels from airport to external destination	Goods are shipped on smaller trucks from origin in CMAP region to airport

(*Truck distribution centers used for selected commodities only as specified)

Distribution centers are not used for outgoing truck shipments, as the long-distance trucks commonly leave from the commodity-generating firm on a larger truck to their final destination without reloading within the CMAP model area.

To distribute truck trips across various distribution centers and intermodal facilities, the size terms of each were used. For distribution centers, the size term was given by the size of the site in square feet, for ports, the size term was given by number of berth, and for other intermodal facilities (namely rail yards and airports), size was defined by the amount of cargo shipped through the facility by year. The location of facilities and their sizes were provided by CMAP.

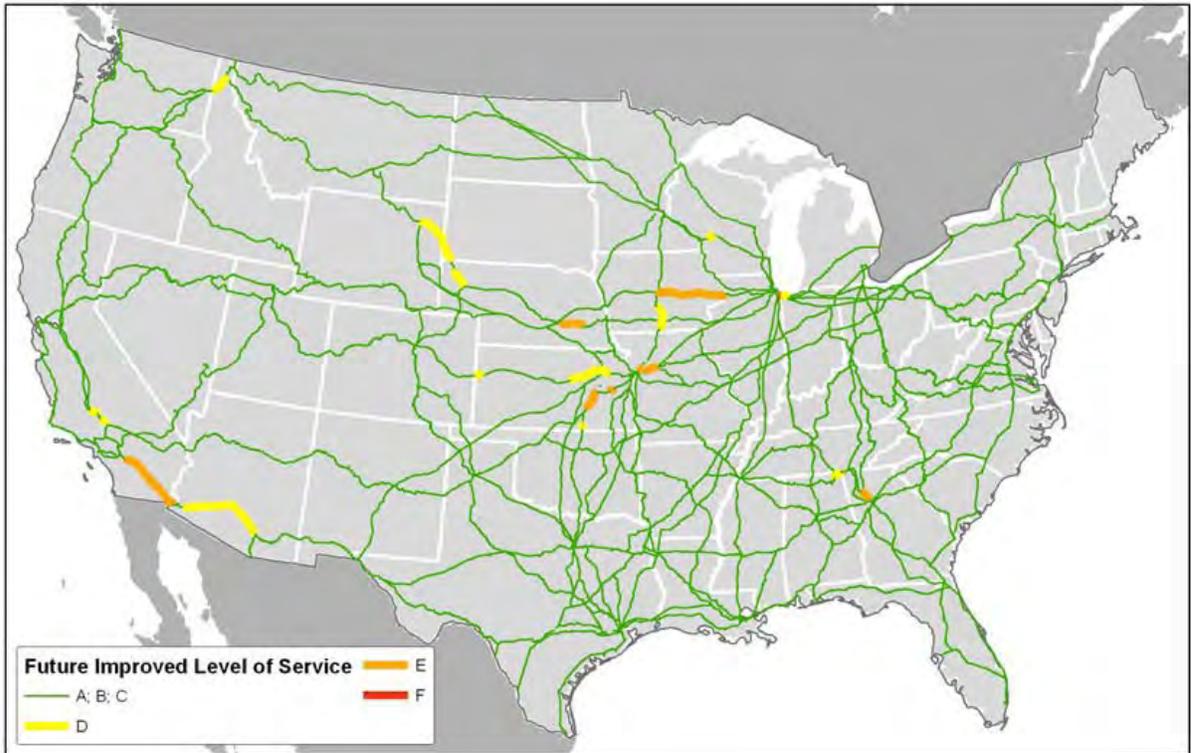
As seen above, extensive freight modeling was performed to better understand truck freight movements, including all of its various components. Given the stakeholder comments received regarding truck traffic in the Study Area, the existing and proposed major intermodal facilities in the Study Area, and the continued importance of freight movement in the region as reflected in the CMAP and Northwestern Indiana Regional Planning Commission long range transportation plans, the Illiana Corridor Study placed considerable effort to develop a freight travel model to better understand future truck travel patterns.

Freight Railroad Analysis

As the freight travel model was being developed to project freight traffic flows, the project team reviewed the findings of previously performed studies that related specifically to freight rail in the region. One such effort was the National Rail Freight Infrastructure Capacity and Investment Study, published in 2007 by the Association of American Railroads (AAR).

As reported in the TSP Report, the AAR study found that the U.S. Department of Transportation's (USDOT) found that to meet the forecast demand for 2035 will require the Class I freight railroads to increase their investment in infrastructure expansion. An estimated \$135 billion, or about \$4.8 billion per year, is required for rail infrastructure investments by the Class I railroads. Under this scenario, as shown in the figure below, only one small choke point (level of service D) remains in the Chicago region by 2035.

2035 Improved Rail Freight Level of Service (AAR Study)



The Class I freight railroads anticipate that they will be able to meet most of this increase in investment through growth and productivity gains. If revenue and capital expenditures for expansion follow the growth in rail tonnage, the Class I railroads could realize about \$70 billion of the \$135 billion from growth. And if the Class I railroads can continue to achieve train productivity gains of up to 0.5 percent per year, the railroads could realize savings of \$26 billion in reduced capital expenditures. This would leave a balance for the Class I freight railroads of \$39 billion or about \$1.4 billion per year to be funded from railroad investment tax incentives, public-private partnerships, or other sources.

It is also important to understand how the Class I railroads operate. As seen in the figure below, the Class I railroads tend to serve specific regions in the U.S. For example, the BNSF and UP primarily serve the western portion of the U.S. As seen in this figure, there is a general confluence of the Class I railroads in our region. However, each of the Class I railroads have their own rail infrastructure to serve their needs. Looking at our region, there are also a number of short line railroads that operate. These short line railroads typically link the larger Class I railroads or serve specific industries.

As shown in the figure below, east-west freight railroad lines exist just north of the Study Area (CN, formerly EJ&E), and just south of the Study Area (NS).

The Class I railroads are private companies and make investment decisions using a business case model. When there is a business case, they also have operating agreements with other Class I railroads and short line railroads to operate on their competitors' facilities via financial compensation, trading of operating rights or other considerations (known as "trackage rights").

The Class I railroads have been invited to participate in the Illiana Corridor Study. To understand if the Class I railroads have any proposals for east-west freight railroad connections in the Study Area, the project team has attempted to meet with each of the railroads. The project team met with representatives of Norfolk Southern Corporation (NS) and the Union Pacific (UP) Railroad in October 2011.

A number of issues were discussed at the NS meeting, including any potential need for a freight railroad east-west interconnection between intermodal centers. NS officials were cautious of this need due to the potential for land developers trying to maximize the value of their properties. In addition, NS stated that they were aware of 2007 AAR Study findings showing a potential bottleneck by 2035 and the proposed improvements to maintain an acceptable level of service. NS noted that improvements outlined in the report represented a scenario based on the railroads' willingness to participate in making the investments and generating enough revenue to make the improvements.

The meeting with UP officials covered roadway access and the project's potential impact on existing intermodal yards. Relative to new infrastructure, it was UP's position that adding an east-west freight railroad line in the Study Area did not provide much benefit, particularly when two east-west freight railroad lines are already present in close proximity (to the north and south) of the Study Area.

Repeated attempts were made to meet with the other major freight railroads operating in the Study Area and the team continues to reach out these carriers. Summaries for project team meetings with freight rail providers are attached as an appendix to this document.

In addition, investments by the Class I railroads, in partnership with IDOT, the City of Chicago, and Metra, through the Chicago Region Environmental and Transportation Efficiency (CREATE) program will improve the congestion and delay through the region. These improvements are anticipated to facilitate rail freight growth in the region. Other private railroad projects such as the recently opened CSX facility in North Baltimore, Ohio and the NS Indiana Gateway projects will also positively impact east-west rail freight capacity issues. These projects are all considered as part of the No-Build scenario for the Illiana Corridor project.

In summary, the freight railroads have not provided any demonstration of need for a new east-west freight railroad in the Study Area. For another entity to develop an east-west freight railroad in the Study Area, speculative measures would have to be in place to get an

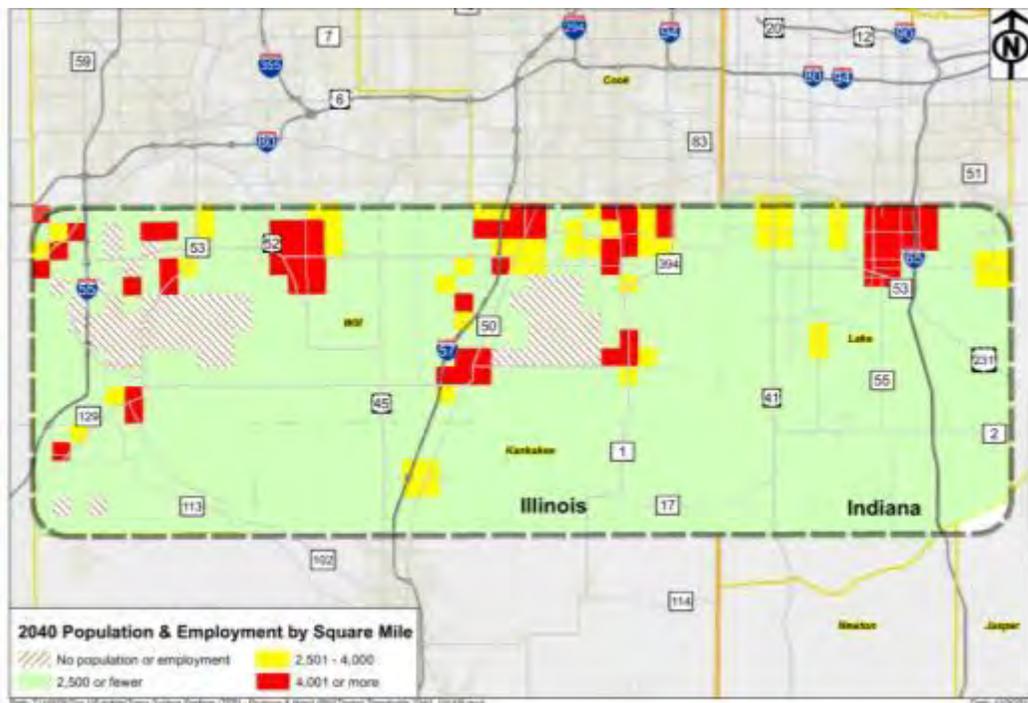
operating agreement for use of the east-west facility through the study area. For these reasons, the need for such a new east-west freight railroad facility was not identified.

Fixed Guideway Transit Analysis

In the TSP Report, the project team conducted a transit threshold analysis based on criteria developed by transit providers in the region.

Pace, the Chicago region’s suburban bus service provider, has established criteria to evaluate the need for fixed-route bus service. Using a square mile as the base geography, Pace looks for a minimum combined total of 4,000 residents and employees as a threshold density for regular fixed-route bus service. For feeder bus service, which has limited service during peak periods and terminates at commuter rail stations, Pace recommends a minimum combined total of 2,500 residents and employees. In addition to the base threshold requirements, Pace also looks for a minimum of two contiguous square miles or a larger area (six square miles) with 75 percent of the area meeting the base threshold. Service levels start with buses every 30 minutes during peak commute periods and 60 minutes during off-peak. Increased service is based on demand or growth in population and employment within the square mile.

2040 Transit Threshold



This analysis shows that the minimum thresholds for a fixed-route bus (shown in red) are met in a few communities in the northern and central portion of the Study Area. These areas would just be able to support fixed-route bus service, and do not have the density to support

circumferential (east-west) fixed guideway transit facilities. In addition, a major trip generator does not exist along this east-west (circumferential) corridor. An important reason for the success of the Metra commuter rail lines is they all serve the Chicago Central Area, which is the major employment and entertainment center for the region.

The project team met with representatives of Metra, Pace and River Valley Metro in November and December of 2011 to discuss potential transit needs in the Study Area.

Metra staff had reviewed the project's transit threshold analysis and concurred with the conclusion that east-west fixed guideway transit in the study area was not supported based on the population and employment density. Metra added that there is already an east-west freight railroad connection north of the Study Area and added that the use of the eastern leg of the EJ&E located north of the study area is also a very long-term concept for commuter rail service from Joliet to Lynwood (an east extension to the proposed STAR line). Metra is telling communities along the proposed STAR Line that the project is a long-term proposition, and that the eastern extension of the STAR Line along the EJ&E is an even longer-term concept. Based on this information, Metra indicated their agreement with the TSP, as well as not including even the eastern leg of the EJ&E passenger rail concept.

Pace staff also concurred with the project's threshold analysis, but indicated that there would be opportunities to support the Illiana project for the whole family of Pace bus services, including dial-a-ride, flexible bus routings, and fixed route service. Pace also pointed out that the South Suburban Mayors and Managers Association had interest in new east-west Pace bus service in the northern portions of the Study Area.

Staff from River Valley Metro (RVM) sees their bus service as a more logical extension of radial service than a rail extension to Kankakee, due to the high cost of a rail extension. They serve local bus service density thresholds lower than Pace's, but are still able to sustain ridership on these types of routes.

Summaries for project team meetings with these transit providers are attached as an appendix to this document.

Because on the data presented by the transit threshold analysis and comments received by the major transit providers in the Study Area, the Illiana Corridor project team did not identify any specific needs for a stand-alone east-west fixed guideway transit facility in the Study Area.

Commenter	Comment	Response
USEPA	USEPA does not concur with the three summary bullet points under Project Need as fully or clearly representing the underlying problems the purpose and need are to address. (Comment from Meeting) Congestion on I-80/94 and the lack of east-west routes in the study area need to be addressed.	The “global” P&N points represent the diverse transportation needs in the Study Area, the surrounding South Sub-Region and the overall Region. The sub-points more clearly define the detail of the overall global and general P&N points. Section 1.5.2.2 (Address Lack of Continuous Higher Functional Classification East-West Routes through the Study Area) devotes almost two pages to this topic, and the availability of only a single interstate route north of the Study Area, I-80/94, for regional east-west travel is mentioned in 1.5.1.1 (Address Projected Growth in Regional East-West Travel) and 1.5.3.2 (Provide More Efficient Freight Movement).
USEPA	<p>USEPA does not concur with the planning study area and reasonable termini. Although the Transportation System Performance (TSP) Report is very good, the Purpose and Need Sections 1.5.1 through 1.5.3 subheadings are used in an initial alternatives analysis that seems to redefine the needs. We recommend and could concur with the current project build needs if identified as:</p> <ul style="list-style-type: none"> • to provide Will, Kankakee and Lake Counties with one or more major multimodal east-west transportation corridors that can sustain future transportation needs of the study area and the region • to provide a bypass route for congested I-80 east-west traffic • to provide for both currently anticipated and future potential local and regional freight transportation needs 	<p>The termini for the study meet the requirements in 23 CFR 771.111(f) that a project:</p> <ul style="list-style-type: none"> • Connect logical termini and be of sufficient length to address environmental matters on a broad scope • Have independent utility or independent significance (i.e. be usable and a reasonable expenditure even if no additional transportation improvements in the area are made • Not restrict consideration of alternatives for other reasonably foreseeable transportation improvements <p>As the end points (termini) of the Illiana Corridor are not yet fixed along I-55 or I-65, there are opportunities to place them in a way that continuous east-west travel beyond the termini is best facilitated.</p> <p>Sections 1.5.1 through 1.5.3 do not contain an alternatives analysis. It documents the transportation deficiencies within the study area. Alternatives will be crafted to address the deficiencies identified in the Purpose and Need statement.</p> <p>Please note that the regional planning agencies with responsibilities in the study area have not identified a need for an extension west of I-55 or east of I-65 in their long range planning documents, either in the fiscally constrained or illustrative portion of their planning analysis.</p>

Commenter	Comment	Response
USEPA	USEPA has actively participated in the Illiana Corridor Tier I scoping, and consistently raised concerns in these areas. Some good clarifications have been made in presentation materials, but the above concerns are not addressed by the distributed materials. We e-mailed the state project managers with our standing concerns on December 21, 2012, but are not aware of any changes to be considered at this Friday meeting.	The project team appreciates the active participation and feedback received from USEPA throughout the project development process. All of the comments received from all stakeholders during the development of the Purpose and Need statement have been considered and many of the ideas and suggestions have been incorporated. In some instances, we are unable to incorporate comments because they are beyond the scope of the study or there is no data to substantiate a perceived need beyond the accepted planning horizon.
USEPA	While the planning horizon is 2040, USEPA has recommended the project take advantage of the opportunity to plan beyond 2040 for multimodal transportation needs and open space connectivity in a sustainable way. This could take the form of creating a wider reserved corridor than may be beyond the requirement for a “build” Illiana Corridor right-of-way. (Comment from Meeting) The P&N should explicitly state the need for a corridor concept looking 100 years in the future. A corridor approximately 1000 feet wide that could capture very long range needs not only of transportation modes but also utility and communication needs should be considered. This could be the last chance to preserve a corridor in the area that could accommodate future needs.	Per FHWA’s Technical Advisory T6640.8A, the purpose and need section should clearly demonstrate that a “need” exists. The Purpose and Need, as developed, uses the regional planning agencies 2040 planning horizon to document the regional transportation needs. The information collected is considered the best available information for planning transportation projects. FHWA does not consider it appropriate to speculate on needs in a NEPA document that are beyond the 2040 transportation planning horizon.

Commenter	Comment	Response
USEPA	<p>The current mandate is to build the corridor from I-65 to I-55, but we continue to recommend that use of these termini do not preclude alternatives that could eventually extend this corridor both east and west to at least reach I-80. The draft P&N statement does not clearly identify the I-80 congestion, both in the east segment where I-80/I-94 join to where I-80/I-294 diverge and in the west segment from Joliet through the I-80/I-55 interchange, as a key problem, which is outside the study area. Additionally, the Purpose and Need Section 1.3 Study Area indicates developmental growth transportation needs but does not address rural agribusiness transportation needs of the study area.</p>	<p>Please note that the regional planning agencies with responsibilities in the study area have not identified a need for an extension west of I-55 or east of I-65 in their long range planning documents, either in the fiscally constrained or illustrative portion of their planning analysis. The termini selected for this study meet the requirements in 23 CFR 771.111(f).</p> <p>The needs analysis that was completed takes into consideration the future improvements that will be made to I-80. Projects such as the recently completed I-80/94/65 interchange, the recently completed add lanes project to I-80 between US 30 and US 45, and the Phase I study to add lanes to I-80 between Ridge Road and US 30 are addressing the I-80 operational issues, and have been considered in the Illiana Corridor Study as “in place” projects by 2040. Even with these major improvements, the Study Area is still projected to have deficiencies in east-west regional travel.</p> <p>We also recognize that some trips passing through, originating or terminating in the Study Area are utilizing I-80/94 as a regional east-west facility due to a lack of better options within the Study Area. The lack of good alternatives to I-80/94 for east-west regional trips is contributing to the problems on I-80/94. However, there are many other east-west travel markets besides those using I-80/94. The study has indicated there is a demand for east-west travel south of I-80/94 that cannot be reasonably accommodated due to lack of appropriate facilities. This east-west demand includes local travel to, from, and within the Study Area, and truck traffic generated by major intermodal facilities in the Study Area.</p> <p>In the analysis of transportation deficiencies in the study area, rural agribusiness transportation needs were not determined to warrant a separate discussion within the Purpose and Need statement.</p>

Commenter	Comment	Response
USEPA	This is a corridor study and should be greater than just a road study. USEPA is concerned that it is not adequately considering all modes.	<p>The study is being developed as a Tier 1 Environmental Impact Statement consistent with the National Environmental Policy Act, the Council on Environmental Quality regulations and FHWA regulations. The goal of the Tier 1 EIS is to identify a preferred corridor or corridors that will be studied in more detail in Tier 2. The corridor(s) identified in Tier 1 will be selected and sized such that multiple modes, as appropriate, may fit within the corridor.</p> <p>Section 1.5.3 of the Purpose and Need has been revised to replace “Truck Freight” with “Freight” to more accurately reflect the deficiencies associated with moving freight within the study area and not focus on a single mode used to move freight.</p> <p>The potential for fixed guideway transit and freight rail, including coordinating directly with transit service providers and freight railroads was evaluated and the project team was were unable to substantiate a need for new or enhanced east-west facilities within the study’s planning timeframe (2040). Bus transit providers did see an opportunity to utilize an east-west highway corridor to enhance their paratransit, local and feeder services. Please see the Technical Memorandum on transit and freight rail for more background.</p>
USEPA	USEPA is not trying to dictate a multi-modal solution. We simply want to leave the options open for consideration so as not to preclude multi modes and to preserve options.	The current Purpose and Need and general study approach, by addressing transportation at a corridor level in Tier 1 (with a 2000-foot corridor and 400-foot working alignment for non-arterial alternatives) leaves room for consideration of several modes. Further refinements in the alternatives phase, and introduction of P3 opportunities, will further the potential for consideration of modes and services for which there is a demonstrated need. However, the proposed “1000-foot” wide corridor cannot be supported in a NEPA study without a substantiated need.
USEPA	We recognize your efforts with the Class I Railroads have not yet resulted in identifying a rail need. Consider approaching Class II regional and short line railroads, or state ownership of a rail corridor that could be utilized by several carriers.	We have provided a general public outreach and targeted the rail industry to solicit interest in identifying a corridor-level rail freight need. Based on our outreach, we have not identified a corridor-level rail freight need. The project team will continue coordination efforts with these stakeholders.

Commenter	Comment	Response
USEPA	FHWA's sustainability program should be considered in drafting the P&N. USEPA has concerns over conflict between sustainability effort and FHWA or state DOT policies and practices that hinder its ability to be applied.	<p data-bbox="989 282 1902 464">At this time, there is no national law or policy for implementation of sustainable transportation, and there is no currently integrated national strategy to pursue, although FHWA along with other federal agencies are beginning to discuss such strategies. NEPA and other environmental laws do provide flexibility that can help achieve sustainability goals; still, the purpose and need statement must demonstrate a clear need and not speculative needs beyond a reasonable planning horizon.</p> <p data-bbox="989 496 1902 618">Addressing other potential corridor uses, including multi-modal opportunities, will be considered in the alternatives evaluation and selection process. Further, the NEPA process will consider environmental enhancements, not just lessening impacts, to support sustainability principles.</p>

From: Matt.Fuller@dot.gov [mailto:Matt.Fuller@dot.gov]
Sent: Tuesday, January 17, 2012 7:50 AM
To: MCLARK@idem.IN.gov
Cc: Susinskas, Kesti P.; Hine, Mike; dennis.bachman@dot.gov; Schilke, Steven E;
BLAWRENCE@indot.IN.gov; GKICINSKI@indot.IN.gov
Subject: RE: Illiana Presentation Available for Download

Martha – Thank you for reviewing and providing concurrence on the Purpose and Need statement for the Illiana Tier 1 EIS. The e-mail below is sufficient for documenting IDEM’s concurrence.

The US Army Corps of Engineers, US Fish and Wildlife Service, and US Environmental Protection Agency requested additional information related to the purpose and need at the meeting. We will be providing that information to them shortly and hope to close out the Purpose and Need concurrence point with those agencies soon. We are targeting the middle of March to present the range of alternatives to carry forward to the agencies and we will be soliciting dates and times from the agencies in the next few weeks.

Thanks again for your participation in development of this project.
Matt

From: CLARK METTLER, MARTHA [mailto:MCLARK@idem.IN.gov]
Sent: Friday, January 13, 2012 2:38 PM
To: Fuller, Matt (FHWA)
Subject: RE: Illiana Presentation Available for Download

Matt,
I am sorry I was not able to attend or dial in to the meeting as I had planned. A high priority request from my Commissioner came up at the last minute. IDEM does concur with the presented purpose and need. What is the next step, do you need something specific from IDEM?

Martha Clark Mettler
Deputy Assistant Commissioner
Office of Water Quality
Indiana Department of Environmental Management
100 North Senate Avenue
MC 65-40 IGCN 1255
Indianapolis, IN 46204-2251
317-232-8402



REPLY TO
ATTENTION OF:

DEPARTMENT OF THE ARMY
CHICAGO DISTRICT, CORPS OF ENGINEERS
111 NORTH CANAL STREET
CHICAGO, ILLINOIS 60606-7206

January 18, 2012

Technical Services Division
Regulatory Branch
LRC-2011-00344

SUBJECT: NEPA/404 Merger Process Response to the Request for Concurrence for the Purpose and Need for Illiana Corridor Tier I EIS in Will County, Illinois and Lake County, Indiana

Norman Stoner
Federal Highway Administration
3250 Executive Park Drive
Springfield, Illinois 62703

Dear Mr. Stoner:

This letter is in response to your request that the Department of the Army (Corps) review the Illiana Corridor Tier I EIS and provide concurrence with the Purpose and Need for the proposed project. Various federal and state agencies are providing a concurrent review of the project under the terms and conditions as set forth in the "Statewide Implementation Agreement National Environmental Policy Act And Clean Water Act Section 404 Concurrent NEPA/404 Processes For Transportation Projects in Illinois".

Following attendance at the January 13, 2012 NEPA/404 Merger meeting and a thorough review of the project documents, this office has determined that it cannot concur with the Purpose and Need for the proposed project because there is insufficient data and analysis to support the reasons for proposing the action, as outlined below:

1. Improve regional mobility – address project growth in regional east-west travel:
 - a. The increase in miles traveled by direction (Table 1-4 of purposed and need document) indicates an increase in vehicle miles traveled in the east-west direction that is relatively similar to the increase in the north-south direction. The data supports an overall need for improvement in regional travel when compared with the south sub-region and the region, but not in any particular direction.
 - b. The purpose was not clearly defined. A measurable objective that identifies the requirements for success is needed.
2. Improve regional mobility – reduce regional travel delay/improve regional travel times:
 - a. The stated need is not clearly established. The data in table 1-5 does not include information for the study area. Based on the draft Transportation System Performance (TSP) report, the locations where delay will occur is not uniform throughout the study area.

- b. The purpose was not clearly defined. A measurable objective that identifies the requirements for success is needed.
3. Improve regional mobility – Improve access to jobs:
 - a. The purpose was not clearly defined. A measurable objective that identifies the requirements for success is needed.
4. Address local system deficiencies – Address project growth in local traffic:
 - a. The stated need should be more clearly identified. The growth in local traffic, which was largely evidenced by an increase in population and employment, was disproportionately distributed within the study area with a higher growth concentration in the northern portion. This was discussed in the TSP, but not in this section of the Purpose and Need document.
 - b. The projected growth in ADT by functional classification is shown in table 1-9 of the Purpose and Need document. This table depicts the largest increase in traffic in the local and collector roads, but the document indicates that the local functional class roadways can accommodate this growth without evidence to support this assertion. Smaller, but still substantial, growth is shown for the higher functional classification roadways. This information did not clearly guide the reader towards any particular conclusion relating to the stated need.
 - c. The purpose was not clearly defined. A measurable objective that identifies the requirements for success is needed.
5. Address local system deficiencies – Address lack of continuous higher functional classification east-west routes through the study area:
 - a. The draft Transportation System Performance (TSP) report indicates that the north-south direction has a more balanced functional classification, but there was no context or guidelines for what the appropriate balance should be. Additional guidance should be provided as to how the need for an appropriate balance of road classification is determined.
 - b. The purpose was not clearly defined. A measurable objective that identifies the requirements for success is needed. The assumed purpose is to create an east-west functional classification network that more closely resembles the north-south network, but this is not clearly stated or supported.
 - c. Visually, there does appear to be a lack of continuous east-west higher functional classification roadways in the study area. The need for this should be more clearly established. Additional information contained in the draft TSP report may be of use.
6. Address local system deficiencies – Reduce local travel delay/Improve local travel times:
 - a. The data in table 1-11 indicates a forecasted increase in delay times in the study area, but does not identify where the delays will occur. Figure 4-6 shows the growth in total vehicle trips increasing at different rates throughout the study area, with generally higher increases in the northern section. The specific need should be more thoroughly established.
 - b. The purpose was not clearly defined. A measurable objective that identifies the

requirements for success is needed.

7. Provide for efficient movement of truck freight – Improve accessibility for freight facilities:
 - a. The term “increase accessibility” should be defined. Specifically, address what is meant by accessibility, where it is lacking, and how this will be addressed.
 - b. The purpose was not clearly defined. A measurable objective that identifies the requirements for success is needed.
8. Provide for efficient movement of truck freight – Provide more efficient freight movement:
 - a. The increase in truck freight traffic is not evenly distributed throughout the study area, as shown in figure 4-8 in the draft TSP report. Also, there will be large increases in truck trips moving to, from, within and through the study area. This information identifies an increase in volume, but not delay.
 - b. The purpose was not clearly defined. A measurable objective that identifies the requirements for success is needed.
 - c. The Purpose and Need document indicates that rail freight traffic growth is difficult to identify. It also cites a survey that indicates an increase in demand of 88% by 2035. The increase in truck freight and increase in demand for rail freight seems to indicate a need for addressing truck and rail freight demand. As a corridor study, options to address multiple modes of transportation should be considered.
9. Other comments:
 - a. The purpose and need document does not cohesively address the stated needs and does not provide a clear framework for how, or to what extent, to address the needs. There is no clear picture as to how success will be defined. The document outlines a number of separate yet related issues, but fails to tie them together into an overall package. There is no clear indication whether these needs can be addressed through the construction of a single interstate, multiple arterials, rails, or other options. Some of this analysis will take place during the alternatives analysis, but the purpose and need has not been succinctly established to begin the formation of possible alternatives.
 - b. The purpose and need document does not address public transportation. At the recent merger meeting, it was stated that the population in the study area is forecast to increase by approximately 400,000 persons. Such an increase would appear to identify a need for improvements to the public transportation system. The stated needs of improving regional mobility and addressing local system deficiencies demands that we consider public transportation systems in a corridor level design project.
 - c. The use of rail freight is not thoroughly analyzed as a viable option for dealing with the increase in freight traffic. Simply putting all of this increased freight traffic on the roadways may not be the best viable alternative. This issue should be more thoroughly addressed.
 - d. It appears that the stated needs would be best addressed by alternatives located

further north in the study area, as this is where the majority of the increase in population, employment, traffic, etc. is located. This increased need in the northern portion of the study area should be more clearly discussed and established.

If you have any questions, please contact Mr. Soren Hall of my staff by telephone at 312-846-5532, or email at Soren.G.Hall@usace.army.mil.

Sincerely,

Leesa A. Beal
Chief, Regulatory Branch
Chicago District

Copy Furnished:

U.S. Environmental Protection Agency (Norm West)
U.S. Fish and Wildlife Service (Shawn Cirton)
Illinois Department of Natural Resources (Steve Hamer)
Indiana Department of Environmental Management (Jason Randolph)
US Fish and Wildlife Service (Liz McCloskey)



U.S. Department
of Transportation
**Federal Highway
Administration**

Illinois Division

February 1, 2012

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Springfield, IL 62703
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In Reply Refer To:
HPER-IL

Ms. Leesa A. Beal
U.S. Army Corps of Engineers
111 North Canal Street
Suite 600
Chicago, IL 60606-7206

Subject: Request for Concurrence on the Illiana Corridor Purpose and Need Statement

Dear Ms. Beal:

Enclosed is the revised Purpose and Need statement for the Illiana Tier 1 Environmental Impact Statement (EIS). Also provided is a technical memorandum supporting the freight and public transit analysis and a disposition of the comments your office provided by letter dated January 18. The Purpose and Need statement has been revised based on discussions at the January 13 NEPA-404 Merger meeting.

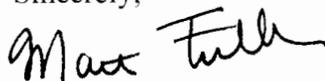
The responses have been prepared in collaboration with the Illinois Department of Transportation and the Indiana Department of Transportation, joint lead agencies for the project. The Federal Highway Administration (FHWA) hereby requests your concurrence with the Purpose and Need Statement for the Illiana Corridor Tier 1 EIS. The Purpose and Need statement satisfies the FHWA and the Council on Environmental Quality's regulatory requirements for a Purpose and Need statement. Additionally, the Purpose and Need statement provides the appropriate information necessary to precede to the next stage of development, consistent with the Illinois NEPA-404 merger agreement.

In a May 12, 2003, letter from the Council on Environmental Quality (CEQ) to the U.S. Department of Transportation (DOT), the CEQ recognized that, as the agencies with legal responsibility for surface transportation projects and with transportation expertise, the FHWA and the Federal Transit Administration should be given "substantial deference" when identifying the transportation purposes and needs that are at issue. Further, as described in the FHWA guidance on implement Section 6002 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), the CEQ's guidance was affirmed by Congress in its conference report on SAFETEA-LU, that is, other Federal agencies should afford substantial deference to the DOT's articulation of the purpose and need for a transportation action (See Question 32, SAFETEA-LU Environmental Review Process, Final Guidance).

We respectfully request that the U.S. Army Corps of Engineers afford the FHWA, and the joint lead transportation agencies, the substantial deference as described in the CEQ's letter to the DOT (attached).

We request your response no later than February 14, 2012. Please contact me by e-mail (Matt.Fuller@dot.gov) or by phone at (217) 492-4625, should you have any questions.

Sincerely,



Matt Fuller
Environmental Programs Engineer

Enclosures

ecc: Mr. Steve Schilke, Consultant Studies Unit Head, IDOT
Mr. Greg Kicinski, Director of Project Management, INDOT
Mr. Walter Zyniewski, Bureau of Design and Environment, IDOT
Ms. Barbara Stevens, Bureau of Design and Environment, IDOT
Mr. Norm West, U.S. Environmental Protection Agency
Mr. Kenneth Westlake, U.S. Environmental Protection Agency
Mr. Shawn Cirton, U.S. Fish and Wildlife Service
Mr. Steve Hamer, Illinois Department of Natural Resources
Mr. Jason Randolph, Indiana Department of Environmental Management
Ms. Elizabeth McCloskey, U.S. Fish and Wildlife Service

DRAFT Purpose and Need Statement

Illiana Corridor Tier 1 Environmental Impact Statement



Prepared for:

Illinois Department of Transportation and
Indiana Department of Transportation

January 10, 2012

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1.0 Purpose of and Need for Action

1.1 Purpose Statement

The purpose of the proposed action is to provide a transportation solution(s) that will improve regional mobility, address local system deficiencies, and provide for efficient movement of truck freight in the Study Area in a manner that complements regional transportation and economic development goals.

1.2 Project Background

The Illiana Corridor was first envisioned as a vital link of an outer encircling highway in the Chicago region in the early 1900s, and has since been studied in a number of forms over the last 40 years. Previous studies, described in the following paragraph, have indicated possible benefits from the development of an east-west transportation corridor extending from I-55 in Illinois to I-65 in Indiana. These benefits include providing an alternate route for motorists travelling the I-90/94 corridor; relieving traffic on the I-80 Borman/Kingery Expressway and U.S. 30; serving as a bypass for trucks around the congested metropolitan area highways; improving access to one of the largest intermodal freight areas in the U.S.; improving access to the proposed South Suburban Airport; supporting area economic development; and increasing the potential for substantial job creation. As traffic volumes on other highways in the region have increased, the associated congestion has resulted in travel delays with substantial economic impacts to industries that depend on the ability to efficiently move freight within and through the region.

In late 2006, the states of Indiana and Illinois, through their respective Departments of Transportation, entered into a bi-state agreement that provided a framework for further development of the Illiana Corridor. The Indiana Department of Transportation (INDOT), in cooperation with the Illinois Department of Transportation (IDOT) conducted the *Illiana Expressway Feasibility Study*¹, which was completed in June 2009. IDOT initiated two additional studies, the *Strategic Role of the Illiana Expressway*² (April 2010) and the *Illiana Expressway Economic Opportunities Analysis*³ (April 2010). Both studies investigated the economic and social benefits that could result from the proposed expressway in the south and southwestern portions of the Chicago region.

The *Illiana Expressway Feasibility Study* reached several conclusions that indicated positive effects of a new transportation facility between I-57 in Illinois and I-65 in

¹ Available at http://www.in.gov/indot/files/FR_INDOT_IllianaExpresswy_07-31-2009.pdf

² Available at <http://www.dot.state.il.us/Illiana/strategicrole.pdf>

³ Available at <http://www.dot.state.il.us/Illiana/finalreport.pdf>

Indiana on congestion relief on I-80 and US 30. Key benefits included improving traffic operations, providing regional economic benefits (including logistics and supply chain effects), improving freight mobility, improving transit linkages, and improving safety. The *Illiana Expressway Economic Opportunities Analysis* concluded that a new transportation facility between I-55 in Illinois and I-65 in Indiana could provide a new east-west connection as an alternative to the congested I-80 and produce substantial regional economic benefits over a 30 year period. These studies were useful in providing the basis for advancing the detailed environmental and engineering studies, of which this Purpose and Need statement is a part.

In addition, both states have passed legislation enabling public-private partnerships (P3) for the Illiana Corridor. The Public Private Agreements for the Illiana Expressway Act (Illinois Public Act 096-0913) and the Indiana Senate Enrolled Act No. 382 allow a collaborative planning effort for a “new fully access controlled interstate highway connecting Interstate Highway 55 in northeastern Illinois to Interstate Highway 65 in northwestern Indiana, which may be operated as a toll or non-toll facility.”⁴ The legislation allows the States to enter into P3s with one or more private entities to develop, finance, construct, manage, and/or operate a roadway connecting I-55 and I-65.

On June 9, 2010, Governors Pat Quinn of Illinois and Mitch Daniels of Indiana signed a Memorandum of Agreement (MOA) for a mutual commitment to the project by both states.

In April, 2011, IDOT and INDOT initiated the Illiana Corridor Tier 1 Environmental Impact Statement. To assist in the development of the environmental and engineering studies for the Illiana Corridor Tier 1 Environmental Impact Statement, a Context Sensitive Solutions approach has been established. Through this process, the public and stakeholders have provided input, and reviewed this purpose and need statement.

1.3 Study Area

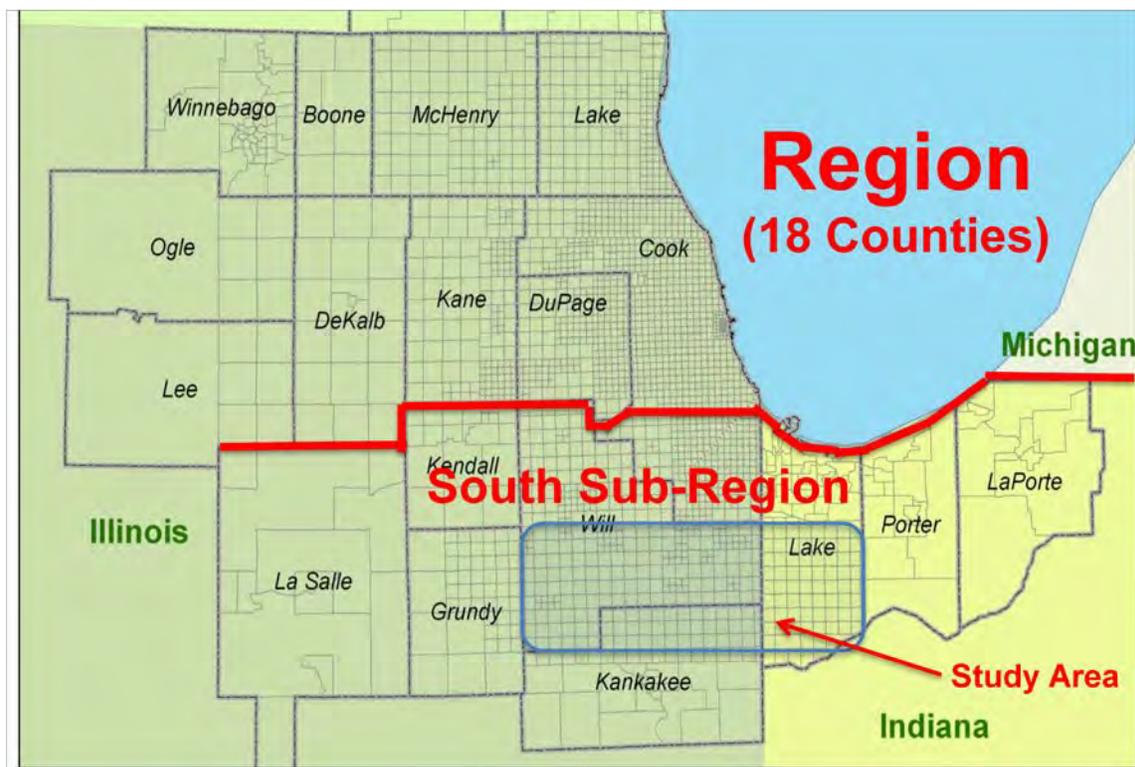
The northeast Illinois and northwest Indiana region is influenced by three key travel sectors, the Region, South Sub-Region, and Study Area. The greater Region (including 18 counties in Illinois and Indiana for purposes of this study) serves as a vital national link for inter-state and national transportation and commerce movement. The Region is also a key intermodal logistical area for transfer of rail, port, and truck freight between modes, which adds substantial trucking demand throughout the region. Portions of the Region are fully developed population centers having long-established and balanced functional classification roadway network. Other areas are not developed, but are projected to experience substantial population and employment gains, but lack the full

⁴ Illinois Public Act 096-913, Public Private Agreements for the Illiana Expressway Act

range of functional classification roadways. As the travel demands throughout the Region increase, the impact on performance and the corresponding needs are quite different due to the varying character of existing areas of the Region.

The South Sub-Region has been defined to include the 9-county area south of Lake Michigan, as shown in Figure 1-1. The South Sub-Region includes regional transportation facilities such as I-80, the Indiana Toll Road, and portions of I-55, I-57, and I-65. The northern portion of the South Sub-Region that includes I-80 is fully developed with limited infill opportunities. This area also has a long-established roadway system with a fully developed functional classification of roadways that includes a mix of interstates, other multi-lane highways, arterials, collectors and local streets.

Figure 1-1. Region and South Sub-Region Map



The roadways in the northern portion of the South Sub-Region are congested, and improvements are underway to address the congestion. With the recent rebuilding and capacity improvements to the I-80/94 Borman Expressway by INDOT, I-80 lane additions currently under construction by IDOT, and current studies on I-80 for additional capacity by IDOT, I-80 is projected to be expanded to its maximum capacity and is included as such in the “No Build” 2040 transportation network.

The southern portion of the South Sub-Region is less developed, and also includes the Illiana Study Area. The Illiana Study Area is shown in Figure 1-2. It is approximately 950 square miles in portions of southern Will County and northern Kankakee County in Illinois and southern Lake County in Indiana. The general location of the Study Area is between I-55 in Illinois on the west, I-65 in Indiana on the east, the areas south of U.S. 30 to the northern portion of Kankakee County in Illinois and the southern portion of Lake County in Indiana.

Figure 1-2. Study Area Map



The Study Area is projected to see greater population and employment growth than the South Sub-Region as a whole, and has a lesser balanced functional network with a lack of east-west interstates and multi-lane highways to handle growth demands than the more developed northern areas of the South Sub-Region. Additionally, existing and planned intermodal freight centers, and the bypass effects of the congested Chicago area of national freight demand, further strain the Study Area transportation network.

A line extending from approximately one mile south of Laraway Road in Illinois on the

west to U.S. 30 in Indiana on the east was determined as the northern boundary of the Study Area due to its location as the generally southern edge of developed land in the region. Much of the area to the north of this boundary is suburban or urban in character and served by a well-developed transportation system. The area south of the northern portions of the Study Area is more rural in nature, served by a lesser-developed transportation system, and poised for major population and employment growth in the near term. The southern boundary of the Study Area was selected to be north of the Kankakee-Bradley-Bourbonnais developed area, and to incorporate the southern portion of Lake County.

The eastern and western boundaries were developed to be consistent logical termini at I-55 in Illinois and I-65 in Indiana. Both I-55 and I-65 are rational end points because they are major north-south interstate routes that are major traffic generators, with I-55 connecting the Chicago region with Springfield, Illinois and St. Louis, Missouri, and I-65 connecting the northwestern Indiana metro region with Indianapolis, Indiana and Louisville, Kentucky. The distance between I-55 and I-65 is approximately 55 miles. Thus, the Study Area is broad enough to address environmental matters on a broad scope. Major north-south cross-roads in the Study Area include I-55, US-52, US-45, I-57, US-41, and I-65 that offer opportunities for regional mobility. To the west of I-55 and the Study Area, is Grundy County, which is a less developed county with a 2010 population of approximately 50,000 persons, and is mostly outside the metropolitan planning organization's jurisdiction. To the east of I-65 and the Study Area, the southern four townships in Porter County are primarily rural and have a 2010 population of approximately 24,000 persons. This proposed action will not restrict consideration of alternatives for other reasonably foreseeable transportation improvements west of I-55, or east of I-65.

1.4 Regional Planning Context

The jurisdictions of three metropolitan planning organizations extend over most of the Study Area: the Chicago Metropolitan Agency for Planning (CMAP), the Northwestern Indiana Regional Planning Commission (NIRPC), and the Kankakee Area Transportation Study (KATS). All three agencies have recently updated their long-range transportation plans to a 2040 planning horizon; accordingly, the Illiana Corridor EIS will use a 2040 planning horizon for consistency with these adopted regional plans.

The Illiana Corridor is described in the current 2040 long-range transportation plans of CMAP, NIRPC, and KATS. CMAP's GO TO 2040 Plan identifies the Illiana Corridor as an unfunded need and "supports initiating Phase 1 engineering for the project in order to narrow the scope to a few feasible alternatives, and recommends that these activities begin as a high priority." NIRPC's 2040 long-range transportation plan also included the Illiana Corridor as an unfunded need. The KATS adopted 2040 Long Range

Transportation Plan (May 2010) includes the Illiana Corridor as a solution to the problem of through trucks using Kankakee County as a connection between Illinois and Indiana. In addition, the Illiana Corridor Tiered Environmental Impact Statement is included in the Transportation Improvement Programs for CMAP and NIRPC.

Population and employment projections for the “no build” 2040 planning horizon were developed for the Study Area by the project study team. These projections are formed by the 2040 projections of the three regional planning agencies, and also include information from market-based projections suitable for design and revenue forecasting decisions that are based on past and current development trends, community land use and development plans, and private-sector growth forecasts. Other transportation agencies in the Region, including the Illinois State Toll Highway Authority, have used this market-based methodology to provide population and employment inputs to determine future travel demand for major project planning purposes. The Illiana Corridor Study has been coordinating with the regional planning agencies to ensure the methodology is appropriate for the purposes of this study.⁵

1.5 Project Need

As travel demands have increased in the South Sub-Region, travelers are seeking alternative routes in the less congested and less developed Study Area. In addition, the Study Area is projected to see substantially higher rates of growth in population and employment than the overall Region, or the South Sub-Region as a whole, in the “no build” 2040 scenario. As a consequence, travelers with east-west travel desires are contributing to north-south congestion, as well as I-80 congestion due to the lack of alternative east-west routes.⁶ I-80 is assumed to be built out to its maximum capacity in the no build 2040 scenario. The north-south feeder routes to I-80 are congested south of I-80. The Study Area does not have a complete functional classification road network, and the existing grid network of lower functional class roadways was historically developed primarily to serve its predominantly agricultural land use. Study Area land uses, however, are now transitioning in character from rural to suburban, especially in the northern portions.

The roads in this area are experiencing, and will continue to experience, a mismatch of vehicle trips and trip types using the lower functional classification roads. This is resulting in a number of travel performance deficiencies affecting regional and local travel as well as impeding the efficient movement of truck freight. For the Study Area to meet the regional, local, and freight demands, a more balanced functional transportation

⁵ Illiana Corridor Transportation System Performance Report, November 2011, available at http://www.illianacorridor.org/information_center/library.aspx

⁶ Illiana Corridor Transportation System Performance Report, November 2011

network is needed. The lower functional class roads are in place, but the longer distance high speed trips for autos and trucks are underserved due to a limited network of higher classification roads. As a result, lower classification roads are being utilized for these unintended purposes of serving longer distance and higher speed trips, creating a need for transportation system improvements.

A transportation system improvement(s) is needed in the Study Area to address the following needs:

1. Improve Regional Mobility
2. Address Local System Deficiencies
3. Provide for Efficient Movement of ~~Truck~~ Freight

These three principal needs were identified based on the analysis performed for the development of the *Transportation System Performance Report* and public and stakeholder input. This analysis included a comparison of 2010 and future 2040 baseline (No Build) transportation conditions in the region. It assumes the implementation of committed projects and those financially constrained major transportation projects included in the adopted long-range transportation plans, excluding any major improvement in the Study Area to address this purpose and need. A regional travel demand model was used to evaluate the transportation system performance of the full Region, South Sub-Region, with focus on the Study Area.

1.5.1 Improve Regional Mobility

“Improve regional mobility” addresses the need to develop a transportation system improvement that serves the projected growth in east-west traffic in the Study Area; reduces regional travel times; and improves access to jobs.

1.5.1.1 Address Projected Growth in Regional East-West Travel

Population forecasts developed for the region show strong growth over the next 30 years, as it continues to attract people and as residential patterns shift. Table 1-1 shows the estimated population growth for the 18-county Region in the regional travel model and the South Sub-Region, as shown in Figure 1-1. Projected population growth for the Region between 2010 and 2040 is 29 percent or over 3 million persons. For the South Sub-Region, population is expected to grow nearly 50 percent or 1.3 million persons between 2010 and 2040.

Table 1-1. Projected Population Growth

Area	2010 Population	2040 Population Projection	Change
Region	10,025,000	12,922,000	29%
South Sub-Region	2,635,000	3,933,000	49%

Source: The al Chalabi Group, 2011

As shown in Table 1-2, total employment for the Region is projected to grow substantially over the next 30 years. Forecasted growth between 2010 and 2040 is 35 percent with an employment gain of nearly 2 million jobs. The South Sub-Region, of which the Study Area is a part, is projected to increase in employment by over 70 percent by 2040. This is due in large measure to the expansion of the northeast Illinois and northwest Indiana region into areas of available land close to existing developed centers. Other contributing factors include the development of suburban centers across the region.

Table 1-2. Projected Employment Growth

Area	2010 Employment	2040 Employment Projection	Change
Region	5,664,000	7,626,000	35%
South Sub-Region	1,099,000	1,889,000	72%

Source: The al Chalabi Group, 2011

Major regional growth will also contribute to a substantial increase in vehicle trips between 2010 and 2040, as seen in Table 1-3.

Table 1-3. Projected Daily Vehicle Trips

Area	2010	2040	Change
Region	61,733,000	77,685,000	26%
South Sub-Region	14,224,000	19,323,000	36%

Source: Illiana Corridor Transportation System Performance Report, November 2011

Table 1-4 shows projected daily vehicle miles traveled within the Study Area in both the north-south and east-west directions. For north-south travel, projected 2040 vehicle miles traveled by all traffic will increase by more than 2.7 million miles, or 67 percent more than current 2010 conditions. The projection for east-west travel shows an even greater growth rate. By 2040, vehicle miles traveled in this direction are projected to increase by more than 2.5 million miles or 79 percent more than the existing 2010 condition. This equates to a total projected increase of 72 percent for the entire Study Area.

Table 1-4. Projected Daily Study Area Vehicle Miles Traveled by Direction

Direction	2010	2040	Change
North-South	4,046,700	6,753,400	67%
East-West	3,291,600	5,880,200	79%
Total	7,338,300	12,633,600	72%

Source: Illiana Corridor Transportation System Performance Report, November 2011

Figure 1-3 shows the change in total daily vehicle trips from 2010 to 2040, and illustrates

the overall desired travel patterns for the growth in all vehicles from various origin districts within and outside of the Study Area. East-west external vehicle trips through the South Sub-Region are projected to have strong growth as shown by the east-west wide red band in the center of the figure. These east-west through trips are expected to occur on higher functional classification facilities, such as I-80/94 and the Indiana Toll Road.

This exhibit reinforces the conclusion that there is strong vehicle trip demand growth for travel market destinations south of I-80. However, I-80/94 is currently the only east-west interstate highway option for meeting those travel desires.

Figure 1-3. Projected 2010-2040 Origin-Destination Growth in Vehicle Trips

1.5.1.2 Source: Illiana Corridor Transportation System Performance Report, November 2011 Reduce Regional Travel Delay/Improve Regional Travel Times

With the projected increases in traffic between 2010 and 2040, vehicle hours of travel (VHT) and hours of delay are expected to increase. Hours of delay are the amount of additional time spent traveling over free flow conditions. As shown in Table 1-5, VHT increases by 34 percent in the Region and by 53 percent in the South Sub-Region, while hours of delay increase by 46 percent for the Region and by 141 percent for the South Sub-Region. This results in trip time increases, economic impacts, and loss of jobs accessibility.

Table 1-5. Projected Change in Daily Vehicle Miles and Hours of Travel and Hours of Delay

Area	2010-2040 Change in VMT	Change	2010-2040 Change in VHT	Change	2010-2040 Change in Hours of Delay	Change
Region	56,125,600	31%	1,578,600	34%	219,100	46%
South Sub-Region	20,640,600	46%	526,800	53%	64,300	141%

Source: Illiana Corridor Transportation System Performance Report, November 2011

1.5.1.3 Improve Access to Jobs

The Study Area currently (2010) has a jobs-to-population ratio of 0.39 (or 39 jobs for every 100 residents) that is 32 percent less than the Region (0.57 jobs-to-population ratio), with the South Sub-Region jobs-to-population ratio 26 percent less than the Region. The Study Area jobs-to-population ratio is projected to improve by 2040 to 0.46, but it will still be 23 percent less than the Region’s projected 0.59 jobs-to-population ratio. This indicates that in general, the Study Area and South Sub-Region have more workers than jobs; so the area is a net exporter of workers.

Regional job accessibility from the Study Area is forecasted to decline between 2010 and 2040 because of increased congestion and travel times. As shown in Table 1-6, accessibility, measured in terms of 2010 and 2040 travel times to 2040 jobs (locations of all jobs that will exist in 2040), will decline for all trip durations between 2010 and 2040. For example, the accessibility to 2040 regional jobs for travel times less than or equal to 30 minutes from the Study Area shows that when using the 2010 highway network, 620,600 future (2040) jobs can be reached, and when using the more congested 2040 highway network, only 491,100 of these future (2040) jobs can be reached, a loss in accessibility of nearly 130,000 jobs or a 21 percent decline.

**Table 1-6. Projected Accessibility to Forecast 2040 Jobs
(From a centrally located zone in Study Area)**

Locations	2010	2040	Accessible Jobs Change
Within 15 minutes	128,300	82,900	-45,400
Within 30 minutes	620,600	491,100	-129,500
Within 45 minutes	1,313,400	1,107,300	-206,100
Within 60 minutes	2,283,300	1,953,700	-329,600

Source: Illiana Corridor Transportation System Performance Report, November 2011

1.5.2 Address Local System Deficiencies

“Address local system deficiencies” focuses on the need to develop a transportation system improvement that serves the projected growth in local traffic, addresses the lack of

continuous higher functional classification east-west routes through the Study Area, and improves Study Area travel times/reduces delay.

1.5.2.1 Address Projected Growth in Local Traffic

Population forecasts developed for the Study Area show substantial growth in the next 30 years. Table 1-7 shows the estimated growth for the Study Area. Study Area population is expected to increase by 176 percent in the next 30 years, with a gain in population of over 411,000 residents. Also shown in Table 1-7 is the forecasted increase in employment over the next 30 years. Employment in the Study Area is projected to increase by 225 percent by 2040, with a gain in employment of over 207,000 jobs.

Table 1-7. Projected Study Area Population and Employment

	2010	2040	Change
Population	233,400	644,640	176%
Employment	92,070	299,470	225%

Source: The al Chalabi Group, 2011

Employment growth is projected to be the highest in the northern portions of the Study Area. The highest total employment concentrations will occur in Hobart and Crown Point in Indiana, and University Park, Monee, Manhattan, Joliet, and Beecher in Illinois.

Based on this forecasted increase in population and employment, total vehicle trips originating in or destined to the Study Area are projected to show a substantial increase of 126 percent between 2010 and 2040, as shown in Table 1-8. Local trips made entirely within the Study Area are projected to increase by 135 percent, while trips entering, leaving, or through the Study Area are projected to increase by 128 percent.

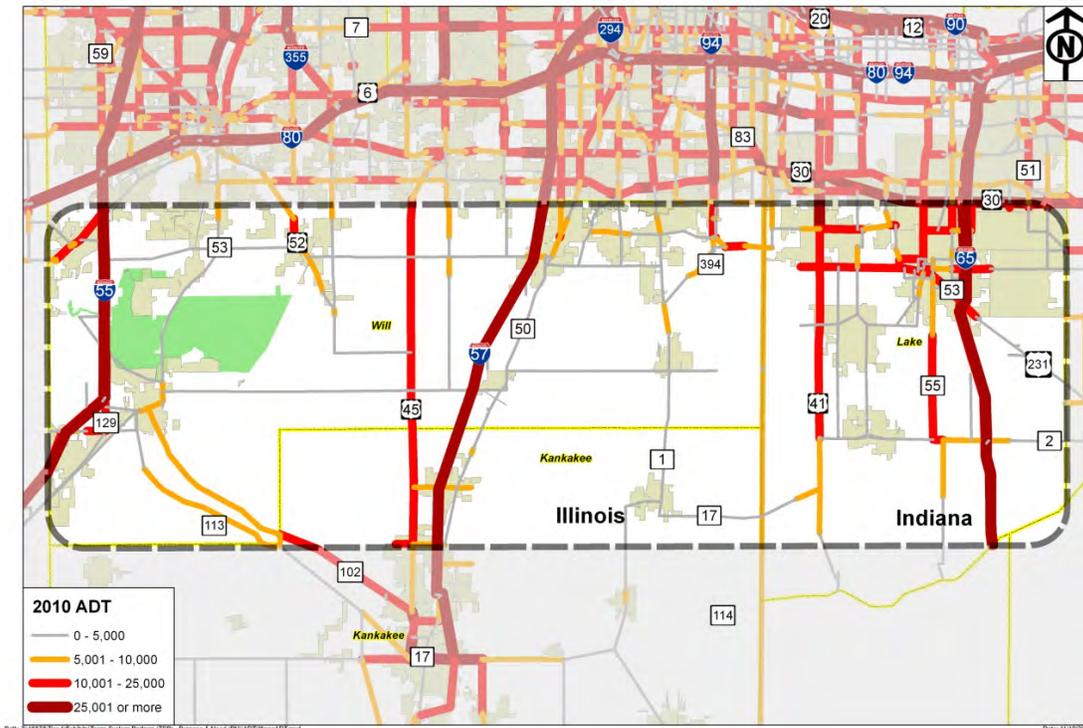
Table 1-8. Projected Daily Study Area Vehicle Trips

Travel Measure	2010	2040	Change
Total Vehicle Trips Originating in the Study Area	666,720	1,505,180	126%
Total Vehicle Trips Destined to the Study Area	663,000	1,495,180	126%
Total Vehicle Trips Within the Study Area	350,340	823,250	135%
Total Vehicle Trips Entering, Leaving and Through the Study Area	1,680,060	3,823,610	128%

Source: Illiana Corridor Transportation System Performance Report, November 2011

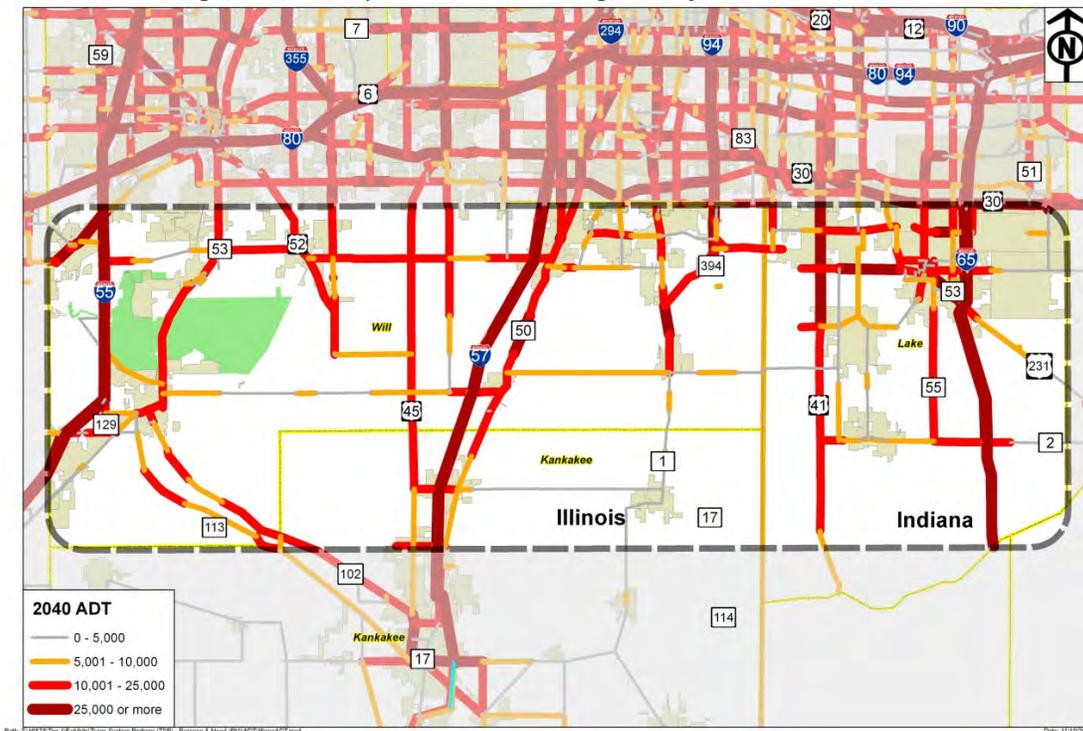
Average daily and forecasted traffic volumes within the Study Area are expected to increase substantially as shown in Figures 1-4 and 1-5. Between 2010 and 2040, increases

Figure 1-4. 2010 Average Daily Traffic



Source: Illiana Corridor Transportation System Performance Report, November 2011

Figure 1-5. Projected 2040 Average Daily Traffic (No Build)



Source: Illiana Corridor Transportation System Performance Report, November 2011

in ADT will be most pronounced in the northern half of the Study Area, and along the I-55, I-57, US-41 and I-65 corridors.

Table 1-9 provides a summary of forecasted growth by functional classification. Growth is expected to occur in the highest percentages on the lower-functional-classification rural roadways, and for principal arterials. The study area roadway network has an adequate number of collector and lower functional class roadways to accommodate this growth. Volumes along other principal arterials are projected to increase substantially, putting more strain on already congested facilities.

Table 1-9. Projected Study Area Growth in ADT by Functional Classification

Functional Classification	2010-2040 Change in ADT
Principal Arterial - Interstate	65%
Other Principal Arterial	124%
Minor Arterial	98%
Collectors, Locals	159%
Total	116%

Source: Illiana Corridor Transportation System Performance Report, November 2011

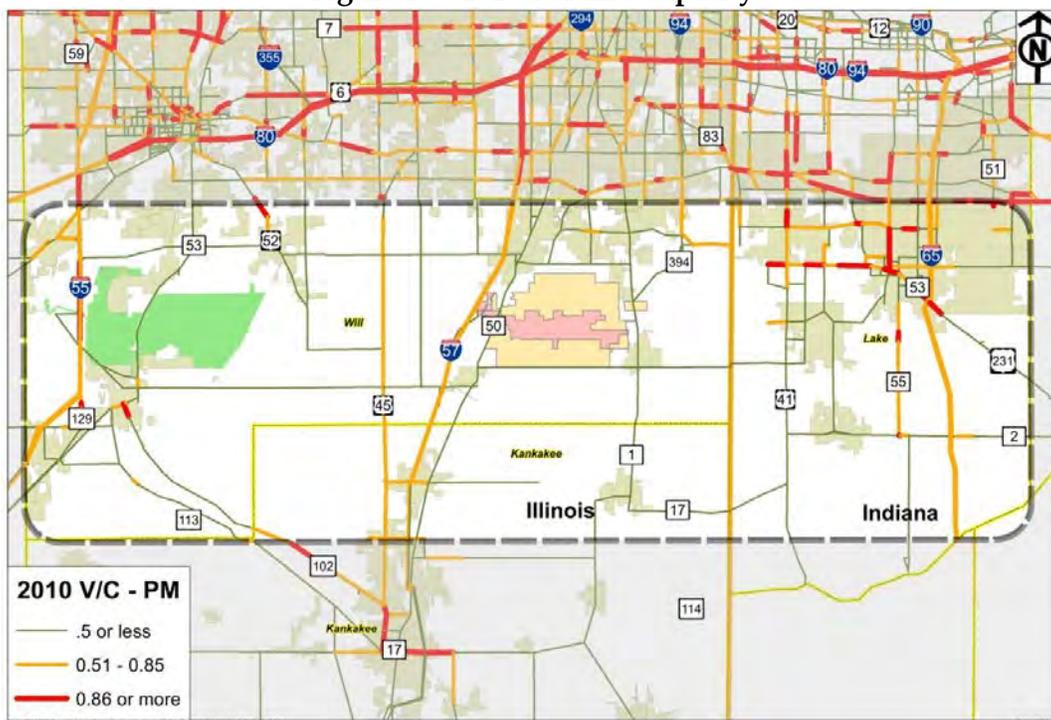
Forecasted traffic congestion in the Study Area is shown in volume to capacity (V/C) calculations performed for the project. Some of the current and projected congestion on north-south routes such as I-57, I-55 and I-65 in the study area can be attributed to longer distance regional traffic accessing I-80 in an out-of-direction pattern due to a lack of other available higher-classification east-west routes (see previous discussion in 1.5.1.1 and Figure 1-3). This condition adds travel and congestion onto the north-south access routes as travelers seek east-west alternatives to the lower functional classification routes in the study area.

V/C is a transportation congestion measure that represents the traffic volumes present to a roadway's ideal carrying capacity. V/C equal to one indicates a roadway is at its limit of carrying capacity. V/C is considered to be uncongested when it is 0.50 or less, approaching congestion when it is between 0.51 and 0.85, and congested when it is 0.86 or more.

With a few exceptions, the immediate Study Area is operating at V/C of 0.50 or less in its existing roadway network configuration and with 2010 volumes. However, the two main east-west roadways directly north of the Study Area, I-80/94 and US 30, both experience high levels of congestion currently.

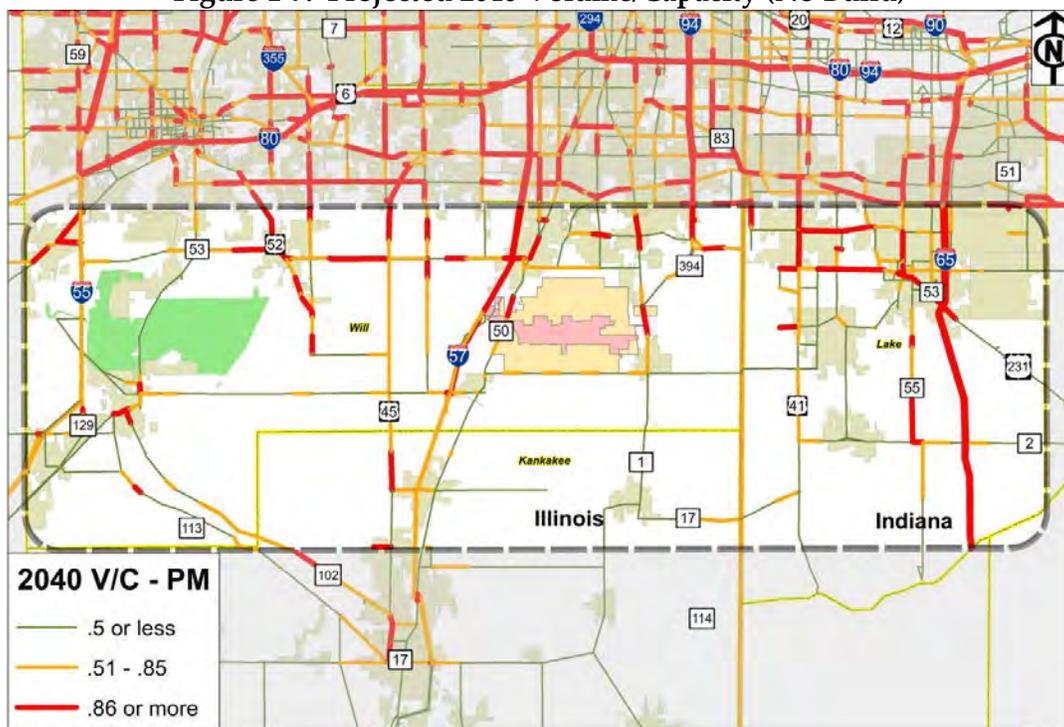
Figures 1-6 and 1-7 show 2010 and projected 2040 V/C for roadways in the Study Area. For I-80/94, this measure indicates "congested" for nearly all sections in 2010 as well as the 2040 No Build. For US 30, this measure indicates "approaching congestion" and

Figure 1-6. 2010 Volume/Capacity



Source: Illiana Corridor Transportation System Performance Report, November 2011

Figure 1-7. Projected 2040 Volume/Capacity (No Build)



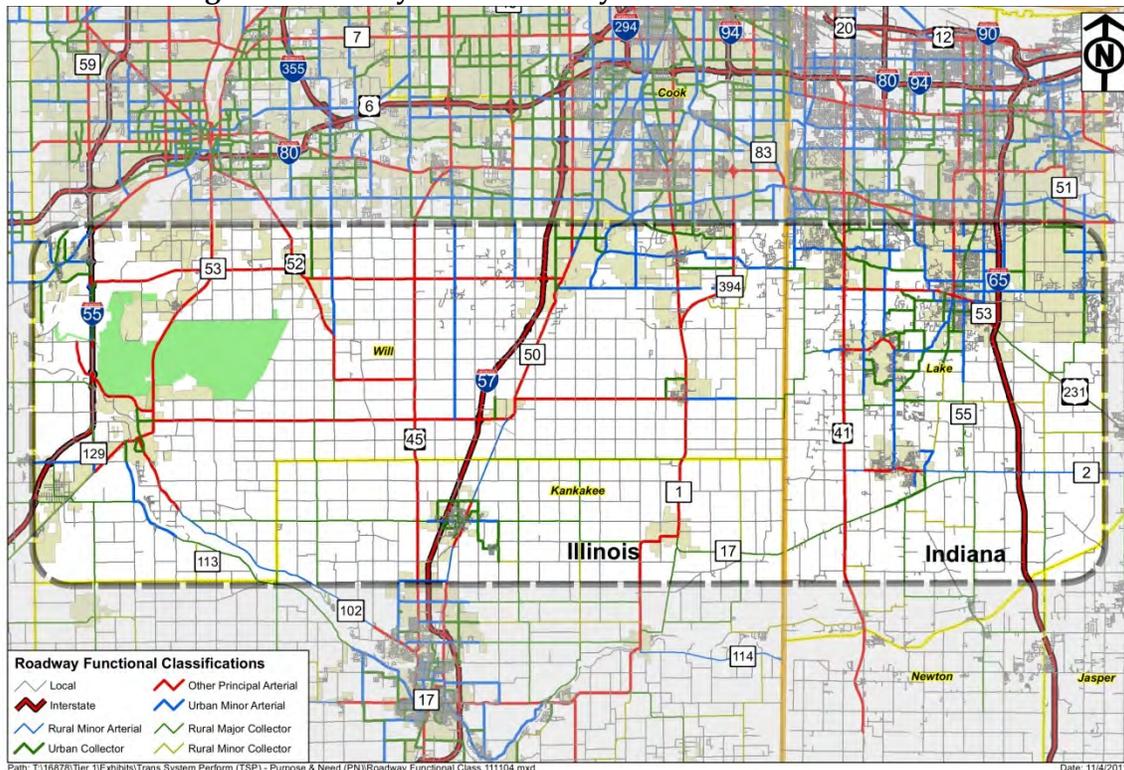
Source: Illiana Corridor Transportation System Performance Report, November 2011

“congested”, with increasing congested segments primarily east of I-57. Multilane and two-lane highways will also experience substantial deterioration in their operations. Congestion will be especially noticeable on principal arterials with additional segments having V/C ratios “approaching congestion” and “congested” in the year 2040.

1.5.2.2 Address Lack of Continuous Higher Functional Classification East-West Routes through the Study Area

There are limited east-west, higher functional class roads in the Study Area, as shown in Figure 1-8. Functional classification is the grouping of roads by the character of service they provide. This includes, in descending order of capacity, principal arterials (interstates, expressways, other principal arterials), minor arterials (urban and rural), collectors, and local roads.

Figure 1-8. Study Area Roadway Functional Classification



Source: Illiana Corridor Transportation System Performance Report, November 2011

There is also a lack of continuous east-west travel routes through the entire Study Area. The majority of east-west streets are not continuous across the state line between Illinois and Indiana. There are also natural features and federally protected lands in the Study Area, such as the Des Plaines and Kankakee rivers and the Midewin National Tallgrass Prairie located in the western portion of the Study Area, and West Creek and Cedar Lake in the eastern portion of the Study Area, which constrain options for east-west

travel. The proposed South Suburban Airport, for which IDOT is currently acquiring property, would result in east-west road closures.

To the immediate north of the Study Area, there is a well-developed roadway system with a balanced functional classification system. This includes interstate highways and other principal arterial highways in the east-west direction, including I-80/94, US-30, and US-6. However, I-80 is assumed to be built out to its maximum capacity in the 2040 no-build, and the Study Area proper contains no east-west interstate routes. The first available east-west interstate route south of I-80/94 is I-74, which is approximately 100 miles to the south. Manhattan-Monee Road and Peotone-Wilmington-Beecher Road are the main east-west other principal arterials in the Study Area and they are two-lane facilities that do not extend completely across the Study Area.

As seen in Table 1-10, there are only 141 east-west lane miles of other principal arterials in the Study Area. Given that the Study Area is a rectangle of more than 55 miles in the east-west direction and less than 20 miles in the north-south direction, there are a disproportionately small number of interstate and other principal arterial lane miles in the east-west direction compared to the north-south direction that will need to accommodate the projected growth in east-west travel shown in Figure 1-3. The Study Area has an adequate number of lower functional class routes in both directions.

Table 1-10. Study Area Lane Miles by Functional Classification

Functional Classification	North-South	East-West
Interstate	210	0
Other Principal Arterial	224	141
Minor Arterial (Urban)	76	123
Minor Arterial (Non-Urban)	33	24
Collector & Local (Urban & Non-Urban)	1,375	1,158
Total	1,914	1,445

Source: Illiana Corridor Transportation System Performance Report, November 2011

The lack of available east-west interstate and other principal arterial routes in the Study Area forces some trips having an east-west destination to first travel north to I-80, the nearest east-west interstate highway. This is contributing to the congestion on the north-south arterial routes that access I-80. The lack of continuous higher functional class east-west routes limits travel route options causing adverse travel that adds economic cost, delay, congestion, reduced job accessibility, and a mismatch of trip type with appropriate routes.

1.5.2.3 Reduce Local Travel Delay/Improve Local Travel Times

With the projected increases in traffic between 2010 and 2040, vehicle miles of travel (VMT), vehicle hours of travel (VHT) and hours of delay within the Study Area are all projected to increase substantially. VHT is the total time spent traveling by all vehicles on

the roadway network. Vehicle hours of delay are the increased time spent traveling over free flow conditions. As shown in Table 1-11, VMT increases by 72 percent from 2010-2040, VHT increases by 84 percent and hours of delay increases by over 200 percent of the current condition. This substantial increase in travel time will lead to economic loss with 15,000 hours of daily delay in 2040, which is equivalent to \$113 million annually, assuming an average vehicle value of time of \$20.61/hour.⁷

Table 1-11. Projected Daily Study Area Vehicle Hours of Travel and Hours of Delay

Congestion Measure	2010	2040	Change
Vehicle Miles of Travel (VMT)	7,338,000	12,634,000	72%
Vehicle Hours of Travel (VHT)	177,200	326,000	84%
Hours of Delay	4,900	15,000	206%

Source: Illiana Corridor Transportation System Performance Report, November 2011

1.5.3 Provide for Efficient Movement of ~~Truck~~ Freight

To sustain its role as a vital national link for national commerce movement, and address the growing travel demands of intermodal transfer activity, the transportation system must meet the need for efficient movement of ~~truck~~ freight. “Provide for efficient movement of freight” focuses on the need to improve the accessibility of freight movement to and from its distribution points throughout the region, and provide more efficient truck freight movement on the roadway network.

1.5.3.1 Improve Accessibility for Freight Facilities

The northeast Illinois and northwest Indiana region serves as a freight transportation center for the country. The movement of freight is critical to both the national and regional economies. In the Chicago region, trucks carry about 1.5 billion tons of freight annually and rail carries 631 million tons⁸.

As seen in Table 1-12, truck hours of travel (THT) are projected to increase for both the Region and South-Sub-Region, with the Study Area showing over 80 percent growth by 2040. The Study Area growth in truck hours of travel is expected to increase at a faster rate than the South Sub-Region and Region. This is due to the Study Area having a higher growth rate in truck trips and congestion. Similarly, truck hours of delay are shown in this table, with substantial 2010 to 2040 growth, especially for the South Sub-Region and Study Area, which grow at 324 percent and 442 percent, respectively.

⁷ NCHRP Report 456 Guidebook for Assessing the Social and Economic Effects of Transportation Projects

⁸ CMAP website, <http://www.cmap.illinois.gov/2040/freight-system>

Table 1-12. Projected Daily Truck Hours Traveled and Truck Hours of Delay

Area	2010 THT	2040 THT	Change	2010 Truck Hrs of Delay	2040 Truck Hrs of Delay	Change
Region	286,400	433,600	51%	55,860	113,900	111%
South Sub-Region	90,900	155,000	70%	5,890	25,000	324%
Study Area	15,700	28,400	81%	480	2,600	442%

Source: Illiana Corridor Transportation System Performance Report, November 2011

This table shows the added travel time and delay time that will be faced by trucks in the Study Area and South Sub-Region due to the increased future congestion, resulting in diminished accessibility and economic loss. The 2,600 hours of daily truck delay in 2040 translates to nearly \$34 million annually, assuming \$35.73/truck vehicle hour as a value of time.⁹

The Study Area includes a number of existing and planned freight transportation facilities, as shown in Figure 1-9. In particular, there are several large freight facilities that exist or are proposed for the Study Area. These include the existing CenterPoint Intermodal Center in Elwood, Illinois; the existing CenterPoint Global IV Intermodal Center in Joliet, Illinois; the proposed RidgePort Logistics Center in Wilmington, Illinois; and the proposed CenterPoint Intermodal Center in Crete, Illinois, which are rail-truck intermodal transfer facilities with additional existing and proposed logistics/warehousing businesses in the immediate vicinity of each facility. The two existing intermodal centers in Elwood and Joliet handled more container units in 2008 (3,000,000 twenty-foot equivalent units, or approximately 1.5 million trucks) than any comparable land-based facility, and all but 3 of the largest coastal ports in the U.S.¹⁰ These existing and proposed facilities are projected to account for 47,000 daily truck movements by 2040. In addition, the proposed South Suburban Airport is expected to include a freight cargo facility.

⁹ NCHRP Report 456 Guidebook for Assessing the Social and Economic Effects of Transportation Projects

¹⁰ "Inland Port Impact Study", Will County Center for Economic Development, September 2010.

Figure 1-9. Existing and Planned Freight Facilities

Source: Illiana Corridor Transportation System Performance Report, November 2011

1.5.3.2 Provide More Efficient Freight Movement

Between 2010 and 2040, truck volumes are forecasted for a substantial increase in the South Sub-Region and in the Study Area. Table 1-13 shows the projected growth of 47 percent in truck trips between 2010 and 2040 for the South Sub-Region and 193 percent growth in the Study Area. Figures 1-10 and 1-11 show 2010 and projected 2040 truck ADT for the Study Area.

Table 1.13. Projected Daily Truck Trips

Area	2010	2040	Change
Region	3,850,200	5,223,400	36%
South Sub-Region	824,900	1,340,900	63%
Study Area	87,800	257,100	193%

Source: Illiana Corridor Transportation System Performance Report, November 2011

It is more difficult to isolate and identify rail freight traffic growth through the Study Area. However, a 2007 national rail study indicated that rail freight tonnage demand in the U.S. will increase by 88 percent from 2004 to 2035 (to over 4 billion tons/year) and that a corresponding increase in rail freight traffic will result. In particular, the

Burlington Northern Santa Fe (BNSF) railroad line through the far western part of the Study Area (serving the CenterPoint Elwood and proposed RidgePort intermodal facilities) has an anticipated 80-200 trains/day traffic growth and the CSX/Union Pacific (UP) railroad line through the Study Area (serving the proposed Crete intermodal facility) has an anticipated 30-80 trains/day traffic growth, from 2004 to 2035.¹¹

The primary freight rail capacity deficiency identified by the study is on the western UP line through the Study Area (serving the Global IV intermodal facility in Joliet). The opening of this facility in 2010, along with the proposed introduction of high speed intercity passenger rail service from Chicago to St. Louis, requires rail infrastructure improvements in order to allow fluid operation of 110 mph passenger service. \$1.2 billion in federal funds have been identified for the Chicago-St. Louis high speed rail line to date, and additional studies are underway to address the provision of the required operating capacity for these services¹². No other freight rail capacity issues within the Study Area have been identified, either by interviews with the individual railroads or by research of available freight railroad information. North of the Study Area, the Chicago Region Environmental and Transportation Efficiency (CREATE) program and capacity improvements by the Class 1 railroads are improving rail capacity issues, primarily within Chicago and the immediate surrounding area¹³.

~~While rail capacity improvements are being performed by the individual railroads and CREATE, the resulting~~ increase in truck freight demand creates mobility needs that have not been addressed. Total truck trips originating in or destined to the Study Area are projected to increase by 186 and 185 percent respectively between 2010 and 2040, as shown in Table 1-14. Local trips made entirely within the Study Area are projected to increase by 228 percent, while trips entering, leaving, or through the Study Area are projected to increase by 193 percent. This projected increase in Study Area vehicle trips greatly exceeds the projected 36 percent increase in total truck trips for the entire region.

Table 1-14. Projected Daily Study Area Truck Trips

Travel Measure	2010	2040	Change
Total Truck Trips Originating in the Study Area	36,870	105,520	186%
Total Truck Trips Destined to the Study Area	36,560	104,320	185%
Total Truck Trips Within Study Area	14,410	47,220	228%
Total Truck Trips Entering, Leaving and Through the Study Area	87,840	257,070	193%

Source: Illiana Corridor Transportation System Performance Report, November 2011

¹¹ National Rail Freight Infrastructure Capacity and Investment Study, AAR, 2007

¹² Illinois High Speed Rail website: <http://www.idohtsr.org>

¹³ CREATE website: <http://www.createprogram.org>

Truck vehicle miles traveled within the Study Area in both north-south and east-west directions are shown in Table 1-15. For north-south travel, projected miles traveled by truck traffic each day will increase by more than 425,000 miles from 2010 to 2040, a 60 percent increase. Even greater is the projection for east-west truck travel. By 2040, truck miles traveled in this orientation are projected to increase by nearly 578,000 miles or 106 percent more than the existing 2010 condition. This equates to a total projected increase in VMT of 80 percent for the entire Study Area.

Table 1-15. Projected Daily Study Area Truck Vehicle Miles Traveled

Direction	2010 Truck VMT	2040 Truck VMT	Change
East-West	547,300	1,124,900	106%
North-South	705,800	1,131,800	60%
Total	1,253,100	2,256,700	80%

Source: Illiana Corridor Transportation System Performance Report, November 2011

Figure 1-12 shows the change in truck volumes from 2010 to 2040, and illustrates the overall desired travel patterns for multi-unit trucks from various origin districts within and outside of the Study Area. Truck volumes are expected to grow from the southern part of Will County to the northern part of Will County and to Cook County, including demand growth for east-west as well as north-south truck travel within the Study Area. This exhibit reinforces the conclusion that trucks have market destinations south of I-80, but I-80/94 is currently the only east-west interstate highway option for meeting those travel desires.

Figure 1-12. Projected 2010-2040 Origin-Destination Growth in Truck Trips

Source: Illiana Corridor Transportation System Performance Report, November 2011

Memorandum

To: NEPA/404 Merger Team
From: Steve Schilke, IDOT Project Manager
Date: January 25, 2012

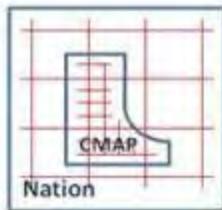
This technical memorandum has been prepared to provide additional background on development of the Draft Purpose and Need Statement (P&N) for the Illiana Corridor Tier One EIS. Specifically, this document will provide supporting information regarding the freight analysis and public transit analysis, and the conclusion that freight railroad and fixed guideway transit needs were not supported as specific need points.

The project team collected extensive data, developed sophisticated travel models, met with numerous stakeholders, and reviewed several existing reports in the preparation of the Transportation System Performance Report¹, which formed the basis for the development of the P&N. Summarized below, is a description of our freight travel modeling that included an extensive national analysis of freight movement, and our specific analysis regarding freight railroad and fixed guideway transit needs .

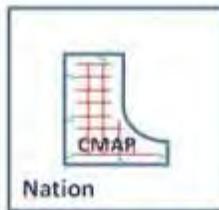
Freight Travel Modeling

As part of the preparation of the Transportation System Performance (TSP) Report, significant effort was expended to understand freight movement in the Study Area and throughout the Region. The freight component of the travel forecasting model for this project was developed using a three-level approach – national, Chicago Metropolitan Agency for Planning (CMAP) model area, and the Illiana Study Area, providing a different level of detail in each level that is most appropriate for the different travel markets.

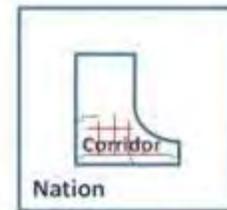
Level I: National



Level II: CMAP



Level III: Illiana



Long-distance truck trips are generated from commodity flow data provided by the Federal Highway Administration in the Freight Analysis Framework (FAF). The simulated truck

¹ Illiana Corridor Transportation System Performance Report, November 2011, available at http://www.illianacorridor.org/information_center/library.aspx

trips cover North America to account for all relevant trucks trips of 50 miles or more. Trips that are internal to CMAP are included as long as they have a distance of 50 miles or more.

The third generation of the FAF data, called FAF³, was released in summer 2010 and contains flows between 123 domestic FAF regions and 8 international FAF regions. FAF³ data provide commodity flows in tons and dollars by:

- FAF zones (123 domestic + 8 international zones)
- Mode (7 types)
- Standard Classification of Transported Goods (SCTG) commodity (43 types)
- Port of entry/exit for international flows (i.e. border crossing, seaport or airport)

The base year is 2007, and freight flow forecasts are provided for the years 2015 to 2040 in five-year increments.

The FAF data contain different modes and mode combinations. For the Illiana project, the freight modes of truck, rail, water and air were analyzed. The remaining modes that are included in the FAF, such as "multiple modes & mail," as well as other and unknown, provide insufficient information to be included, and goods shipped by pipeline commonly travel without being loaded on trucks.

As the region is a major hub for freight transportation, distribution centers and intermodal transfer stations are represented in the freight model. Distribution centers and intermodal transfer stations were included with these attributes:

- Location (as CMAP zone number)
- Modes served (trucks, rail, water or air)
- Size of facility

Further data required for the truck model included the Vehicle Inventory and Use Survey (VIUS) that was performed for the last time in 2002. The U.S. Census publishes the data with survey records of trucks and their usage². Finally, population and employment data are used for FAF³ data disaggregation, and truck counts are used to validate the model.

The resolution of the FAF data with 123 zones within the U.S. is too coarse to analyze freight flows on the Illiana corridor. A method has been developed to disaggregate freight flows from FAF zones to counties and further to CMAP zones. First, the FAF³ data are disaggregated to counties across the entire U.S. using total employment in each county. Within the CMAP model area, more detailed employment is used to further disaggregate to zones. Finally, commodity flows in tons are converted into truck trips using average payload factors.

² <http://www.census.gov/svsd/www/vius/products.html>

Output of this module is a truck trip table from all 6,090 zones to all 6,090 for two truck types, single-unit trucks and multi-unit trucks.

Disaggregation and Aggregation of Freight Flows



This region is a major freight transportation hub for North America. As such, a large number of distribution centers and intermodal transfer centers serve long-distance freight flows by truck, rail, water and air. As there are significant existing and planned freight facilities in the Illiana Study Area, it is important to reflect freight flows generated by these facilities in the freight model.

The figure below depicts such flows. Long-distance trips are routed through distribution centers, and short-distance trucks pick up goods from distribution centers and deliver them to destinations in the region. The same concept is applied with flows by rail, water or air that enter the CMAP model area. Short-distance trucks pick up goods at rail yards, ports and airports and deliver them to their final destinations.



Long-distance Truck Flows Traveling Through Distribution Centers

It is important to note that truck trips are only routed through distribution centers if they enter the CMAP model area (External-Internal). A flow from Chicago to other regions is

expected not to travel through a distribution center. A local manufacturing firm would not use a distribution center to deliver their goods, but rather long-distance trucks pick up the goods at the manufacturing firm. Flows by rail, water or air use intermodal facilities for both directions (External-Internal and Internal-External), as only very few firms have direct on-site access to these modes.

While intermodal facilities are used for all commodities that enter or leave the CMAP model area by rail, water or air, distribution centers are only used for selected incoming truck flows. Distribution centers are mostly used for smaller scale items in large quantities, such as food or clothing. Larger goods, such as machinery, do not travel through distribution centers, but rather are sent to their final destination directly by the long-distance truck. Building materials, as another example, commonly are shipped to the building site without going through a distribution center either. Mostly, distribution centers are used for retail goods, such as food, paper, or consumer electronics.

The table below provides an overview of the use of distribution centers and intermodal facilities. The first block shows inbound trips and the second block shows outbound trips. Each block lists the four modes: truck, rail, water and air, and the long-distance and short-distance truck flows are specified.

Use of Distribution and Intermodal Facilities

Direction	Mode	Long-Distance	Short-Distance
Inbound to Chicago region (External to Internal)	Truck	Long-distance truck trip ends at distribution center*	Goods are shipped on smaller trucks from distribution center to final destination within CMAP region
	Rail	Long-distance rail trip ends at intermodal facility (or rail yard)	Goods are shipped on smaller trucks from rail yard to final destination within CMAP region
	Water	Long-distance water trip ends at port	Goods are shipped on smaller trucks from port to final destination within CMAP region
	Air	Long-distance air trip ends at airport	Goods are shipped on smaller trucks from airport to final destination within CMAP region
Outbound from Chicago region (Internal to External)	Truck	Long-distance truck trip travels from CMAP origin to external destination without use of distribution center	None
	Rail	Long-distance rail trip travels from rail yard to external destination	Goods are shipped on smaller trucks from origin in CMAP region to rail yard
	Water	Long-distance water trip travels from port to external destination	Goods are shipped on smaller trucks from origin in CMAP region to port
	Air	Long-distance air trip travels from airport to external destination	Goods are shipped on smaller trucks from origin in CMAP region to airport

(*Truck distribution centers used for selected commodities only as specified)

Distribution centers are not used for outgoing truck shipments, as the long-distance trucks commonly leave from the commodity-generating firm on a larger truck to their final destination without reloading within the CMAP model area.

To distribute truck trips across various distribution centers and intermodal facilities, the size terms of each were used. For distribution centers, the size term was given by the size of the site in square feet, for ports, the size term was given by number of berth, and for other intermodal facilities (namely rail yards and airports), size was defined by the amount of cargo shipped through the facility by year. The location of facilities and their sizes were provided by CMAP.

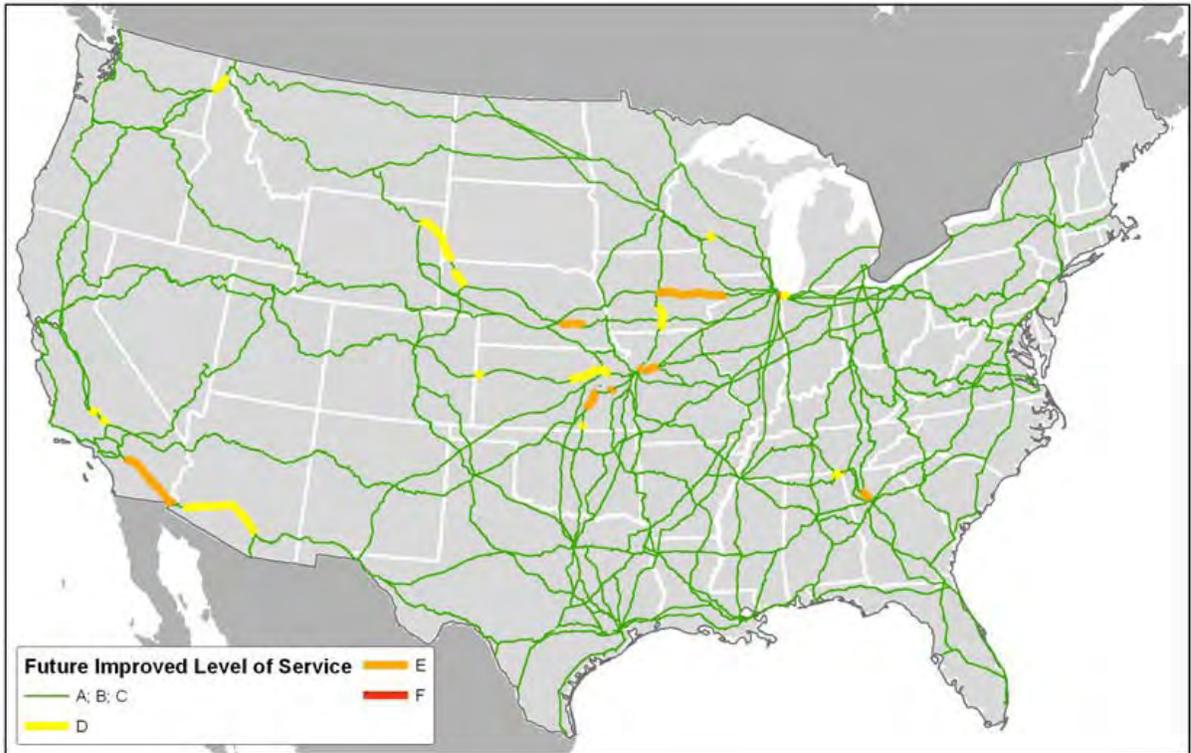
As seen above, extensive freight modeling was performed to better understand truck freight movements, including all of its various components. Given the stakeholder comments received regarding truck traffic in the Study Area, the existing and proposed major intermodal facilities in the Study Area, and the continued importance of freight movement in the region as reflected in the CMAP and Northwestern Indiana Regional Planning Commission long range transportation plans, the Illiana Corridor Study placed considerable effort to develop a freight travel model to better understand future truck travel patterns.

Freight Railroad Analysis

As the freight travel model was being developed to project freight traffic flows, the project team reviewed the findings of previously performed studies that related specifically to freight rail in the region. One such effort was the National Rail Freight Infrastructure Capacity and Investment Study, published in 2007 by the Association of American Railroads (AAR).

As reported in the TSP Report, the AAR study found that the U.S. Department of Transportation's (USDOT) found that to meet the forecast demand for 2035 will require the Class I freight railroads to increase their investment in infrastructure expansion. An estimated \$135 billion, or about \$4.8 billion per year, is required for rail infrastructure investments by the Class I railroads. Under this scenario, as shown in the figure below, only one small choke point (level of service D) remains in the Chicago region by 2035.

2035 Improved Rail Freight Level of Service (AAR Study)



The Class I freight railroads anticipate that they will be able to meet most of this increase in investment through growth and productivity gains. If revenue and capital expenditures for expansion follow the growth in rail tonnage, the Class I railroads could realize about \$70 billion of the \$135 billion from growth. And if the Class I railroads can continue to achieve train productivity gains of up to 0.5 percent per year, the railroads could realize savings of \$26 billion in reduced capital expenditures. This would leave a balance for the Class I freight railroads of \$39 billion or about \$1.4 billion per year to be funded from railroad investment tax incentives, public-private partnerships, or other sources.

It is also important to understand how the Class I railroads operate. As seen in the figure below, the Class I railroads tend to serve specific regions in the U.S. For example, the BNSF and UP primarily serve the western portion of the U.S. As seen in this figure, there is a general confluence of the Class I railroads in our region. However, each of the Class I railroads have their own rail infrastructure to serve their needs. Looking at our region, there are also a number of short line railroads that operate. These short line railroads typically link the larger Class I railroads or serve specific industries.

As shown in the figure below, east-west freight railroad lines exist just north of the Study Area (CN, formerly EJ&E), and just south of the Study Area (NS).

The Class I railroads are private companies and make investment decisions using a business case model. When there is a business case, they also have operating agreements with other Class I railroads and short line railroads to operate on their competitors' facilities via financial compensation, trading of operating rights or other considerations (known as "trackage rights").

The Class I railroads have been invited to participate in the Illiana Corridor Study. To understand if the Class I railroads have any proposals for east-west freight railroad connections in the Study Area, the project team has attempted to meet with each of the railroads. The project team met with representatives of Norfolk Southern Corporation (NS) and the Union Pacific (UP) Railroad in October 2011.

A number of issues were discussed at the NS meeting, including any potential need for a freight railroad east-west interconnection between intermodal centers. NS officials were cautious of this need due to the potential for land developers trying to maximize the value of their properties. In addition, NS stated that they were aware of 2007 AAR Study findings showing a potential bottleneck by 2035 and the proposed improvements to maintain an acceptable level of service. NS noted that improvements outlined in the report represented a scenario based on the railroads' willingness to participate in making the investments and generating enough revenue to make the improvements.

The meeting with UP officials covered roadway access and the project's potential impact on existing intermodal yards. Relative to new infrastructure, it was UP's position that adding an east-west freight railroad line in the Study Area did not provide much benefit, particularly when two east-west freight railroad lines are already present in close proximity (to the north and south) of the Study Area.

Repeated attempts were made to meet with the other major freight railroads operating in the Study Area and the team continues to reach out these carriers. Summaries for project team meetings with freight rail providers are attached as an appendix to this document.

In addition, investments by the Class I railroads, in partnership with IDOT, the City of Chicago, and Metra, through the Chicago Region Environmental and Transportation Efficiency (CREATE) program will improve the congestion and delay through the region. These improvements are anticipated to facilitate rail freight growth in the region. Other private railroad projects such as the recently opened CSX facility in North Baltimore, Ohio and the NS Indiana Gateway projects will also positively impact east-west rail freight capacity issues. These projects are all considered as part of the No-Build scenario for the Illiana Corridor project.

In summary, the freight railroads have not provided any demonstration of need for a new east-west freight railroad in the Study Area. For another entity to develop an east-west freight railroad in the Study Area, speculative measures would have to be in place to get an

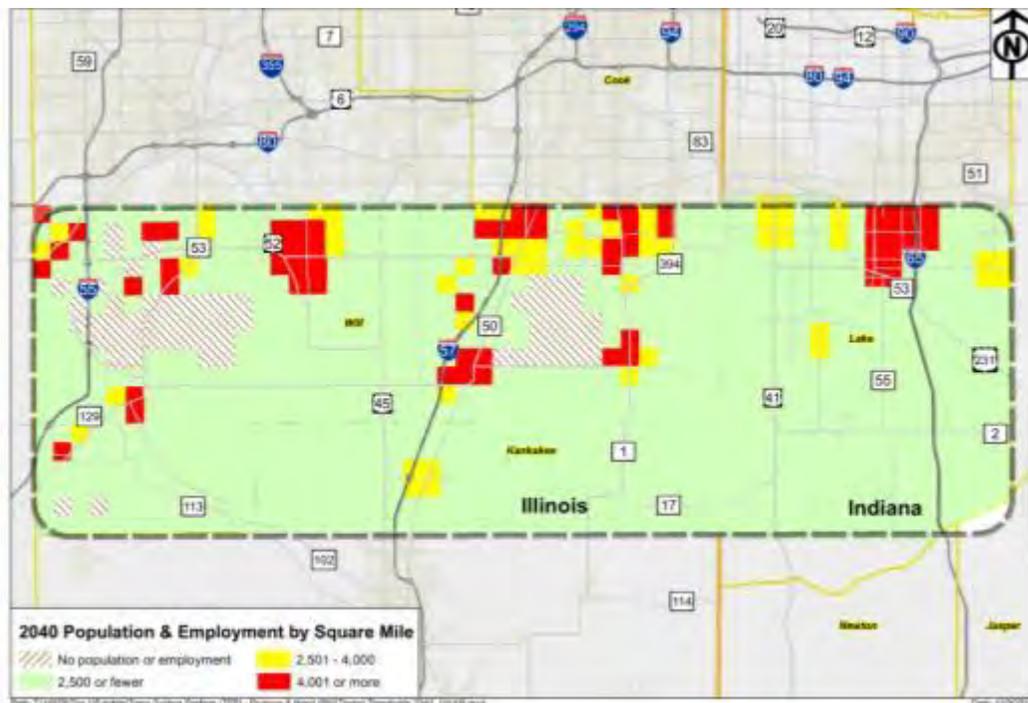
operating agreement for use of the east-west facility through the study area. For these reasons, the need for such a new east-west freight railroad facility was not identified.

Fixed Guideway Transit Analysis

In the TSP Report, the project team conducted a transit threshold analysis based on criteria developed by transit providers in the region.

Pace, the Chicago region’s suburban bus service provider, has established criteria to evaluate the need for fixed-route bus service. Using a square mile as the base geography, Pace looks for a minimum combined total of 4,000 residents and employees as a threshold density for regular fixed-route bus service. For feeder bus service, which has limited service during peak periods and terminates at commuter rail stations, Pace recommends a minimum combined total of 2,500 residents and employees. In addition to the base threshold requirements, Pace also looks for a minimum of two contiguous square miles or a larger area (six square miles) with 75 percent of the area meeting the base threshold. Service levels start with buses every 30 minutes during peak commute periods and 60 minutes during off-peak. Increased service is based on demand or growth in population and employment within the square mile.

2040 Transit Threshold



This analysis shows that the minimum thresholds for a fixed-route bus (shown in red) are met in a few communities in the northern and central portion of the Study Area. These areas would just be able to support fixed-route bus service, and do not have the density to support

circumferential (east-west) fixed guideway transit facilities. In addition, a major trip generator does not exist along this east-west (circumferential) corridor. An important reason for the success of the Metra commuter rail lines is they all serve the Chicago Central Area, which is the major employment and entertainment center for the region.

The project team met with representatives of Metra, Pace and River Valley Metro in November and December of 2011 to discuss potential transit needs in the Study Area.

Metra staff had reviewed the project's transit threshold analysis and concurred with the conclusion that east-west fixed guideway transit in the study area was not supported based on the population and employment density. Metra added that there is already an east-west freight railroad connection north of the Study Area and added that the use of the eastern leg of the EJ&E located north of the study area is also a very long-term concept for commuter rail service from Joliet to Lynwood (an east extension to the proposed STAR line). Metra is telling communities along the proposed STAR Line that the project is a long-term proposition, and that the eastern extension of the STAR Line along the EJ&E is an even longer-term concept. Based on this information, Metra indicated their agreement with the TSP, as well as not including even the eastern leg of the EJ&E passenger rail concept.

Pace staff also concurred with the project's threshold analysis, but indicated that there would be opportunities to support the Illiana project for the whole family of Pace bus services, including dial-a-ride, flexible bus routings, and fixed route service. Pace also pointed out that the South Suburban Mayors and Managers Association had interest in new east-west Pace bus service in the northern portions of the Study Area.

Staff from River Valley Metro (RVM) sees their bus service as a more logical extension of radial service than a rail extension to Kankakee, due to the high cost of a rail extension. They serve local bus service density thresholds lower than Pace's, but are still able to sustain ridership on these types of routes.

Summaries for project team meetings with these transit providers are attached as an appendix to this document.

Because on the data presented by the transit threshold analysis and comments received by the major transit providers in the Study Area, the Illiana Corridor project team did not identify any specific needs for a stand-alone east-west fixed guideway transit facility in the Study Area.

Commenter	Comment	Response
USACE	<p data-bbox="369 298 890 358">1. Improve regional mobility – address project growth in regional east-west travel</p> <p data-bbox="369 399 961 639">a. The increase in miles traveled by direction (Table 1-4 of proposed and need document) indicates an increase in vehicle miles traveled in the east-west direction that is relatively similar to the increase in the north-south direction. The data supports an overall need for improvement in regional travel when compared with the south sub-region and the region, but not in any particular direction.</p> <p data-bbox="369 789 961 873">b. The purpose was not clearly defined. A measurable objective that identifies the requirements for success is needed.</p>	<p data-bbox="989 399 1913 732">a. Table 1-4 indicates strong existing and projected travel demand within the Study Area in the north-south direction as well as the east-west direction. However, there are multiple high-type facilities available to carry the existing north-south traffic demand, as referenced in the Transportation System Performance Report (i.e. I-55, I-57, I-65, IL 53, IL 50, US 41, and several north-south oriented freight rail lines), some of which are planned for upgrades between now and 2040. There are very limited facilities within the Study Area to carry the substantial existing and future demands for east-west travel, as indicated in the Transportation System Performance Report and the statement in the Purpose and Need that I-80/94 (which is located outside the Study Area to the north) is the only interstate highway option for carrying regional east-west travel.</p> <p data-bbox="989 789 1913 1133">b. The purpose in Section 1.5.1.1 of the Purpose and Need is to “Address Projected Growth in Regional East-West Travel”. The discussion that follows this purpose in the Purpose and Need statement describes the underlying transportation deficiencies in the study area.</p> <p data-bbox="1037 927 1913 1133">This purpose concentrates in a specific study area and in a particular direction of travel that is shown to have more needs than the north-south direction. The Daily Vehicle Miles Traveled measure in the Purpose and Need establishes one measure by which improvements from the no build condition will be measured. Additional measures such as Vehicle Hours of Travel or Congested Hours of Travel may be used to evaluate alternatives’ performance against the 2040 baseline condition.</p>
USACE	<p data-bbox="369 1195 961 1252">2. Improve regional mobility – reduce regional travel delay/improve regional travel times:</p>	

Commenter	Comment	Response
	<p>a. The stated need is not clearly established. The data in table 1-5 does not include information for the study area. Based on the draft Transportation System Performance (TSP) report, the locations where delay will occur is not uniform throughout the study area.</p> <p>b. The purpose was not clearly defined. A measurable objective that identifies the requirements for success is needed.</p>	<p>a. The Purpose and Need is establishing a baseline condition in the Region and South Sub-Region by which alternatives can be measured for their overall benefit to these regions, not just within the Study Area. The delay problems will not be uniform throughout the Study Area; however, the most effective alternatives will be those that address the problems by providing the greatest regional and sub-regional benefits. Alternatives that are located in close proximity to the areas with the greatest delays are likely to show greater overall performance in addressing travel measures than similar alternatives that are physically located farther from the problem areas.</p> <p>b. The purpose in Section 1.5.1.2 is to “Reduce Regional Travel Delay/Improve Regional Travel Times”. The discussion that follows this purpose in the Purpose and Need statement describes the underlying transportation deficiencies in the study area. Vehicle Miles of Travel, Vehicle Hours of Travel, and Hours of Delay are the measures that will be used to evaluate alternatives’ performance against the 2040 baseline condition.</p>
USACE	<p>3. Improve regional mobility – Improve access to jobs:</p> <p>a. The purpose was not clearly defined. A measurable objective that identifies the requirements for success is needed.</p>	<p>a. The purpose in Section 1.5.1.3 of the Purpose and Need is to “Improve Access to Jobs”. The discussion that follows this purpose describes the underlying transportation deficiencies in the study area.</p> <p>The Purpose and Need establishes that accessibility to jobs will decline in the Study Area between 2010 and 2040. Increased accessibility to jobs, as measured by the number of jobs accessible within a travel time range or ranges from one or more locations within the Study Area, is advantageous to economic prosperity.</p> <p>The measure of projected accessibility to forecast jobs within ranges of 15, 30, 45 and 60 minute travel time contours establishes a baseline of performance by which alternatives can be measured.</p>

Commenter	Comment	Response
USACE	<p data-bbox="367 297 894 362">4. Address local system deficiencies – Address project growth in local traffic:</p> <p data-bbox="367 394 953 638">a. The stated need should be more clearly identified. The growth in local traffic, which was largely evidenced by an increase in population and employment, was disproportionately distributed within the study area with a higher growth concentration in the northern portion. This was discussed in the TSP, but not in this section of the Purpose and Need document.</p> <p data-bbox="367 703 953 1044">b. The projected growth in ADT by functional classification is shown in table 1-9 of the Purpose and Need document. This table depicts the largest increase in traffic in the local and collector roads, but the document indicates that the local functional class roadways can accommodate this growth without evidence to support this assertion. Smaller, but still substantial, growth is shown for the higher functional classification roadways. This information did not clearly guide the reader towards any particular conclusion relating to the stated need.</p> <p data-bbox="367 1109 953 1206">c. The purpose was not clearly defined. A measurable objective that identifies the requirements for success is needed.</p>	<p data-bbox="989 394 1913 516">a. The growth in projected traffic will be more pronounced in the northern part of the Study area. The local system deficiencies, while being disproportionately distributed, is nonetheless a deficiency throughout the study area and is thus reflected in the Purpose and Need.</p> <p data-bbox="1037 532 1913 654">In the alternatives analysis, it is reasonable to expect that alternatives located nearest to the population centers will perform better from a transportation perspective; however, transportation performance must be balanced with impacts to the human and natural environment during that process.</p> <p data-bbox="989 703 1913 865">b. Our data show that most of the lower classification roads in the Study Area, especially in the southern portion, are not projected to have capacity issues; and therefore, we have not identified that as a project need. The purpose and need focuses on those transportation issues that have a demonstrated need based on an assessment of needs within the 2040 planning horizon.</p> <p data-bbox="1037 881 1913 1060">The lower classification roads were omitted in Figures 1-6 and 1-7 for clarity. On Page 13 of the purpose and need, the paragraph leading into Table 1-9 leads the reader to the conclusion that the lower classification roadways have an adequate number of collector and lower functional class roadways to accommodate growth while the higher class facilities are lacking in the project area.</p> <p data-bbox="989 1109 1913 1352">c. The purpose in Section 1.5.2.1 is to “Address Projected Growth in Local Traffic”. The discussion that follows this purpose in the Purpose and Need statement describes the underlying transportation deficiencies in the study area. The reduction in projected congested roadway sections as evidenced by the V/C maps in Figure 1-6 and 1-7 and is one potential measure of alternatives against the 2040 no build baseline. Additional measures may be used in the analysis of alternatives to determent the performance of the alternatives relative to the no-build alternative.</p>

Commenter	Comment	Response
USACE	<p>5. Address local system deficiencies – Address lack of continuous higher functional classification east-west routes through the study area:</p> <p>a. The draft Transportation System Performance (TSP) report indicates that the north-south direction has a more balanced functional classification, but there was no context or guidelines for what the appropriate balance should be. Additional guidance should be provided as to how the need for an appropriate balance of road classification is determined.</p> <p>b. The purpose was not clearly defined. A measurable objective that identifies the requirements for success is needed. The assumed purpose is to create an east-west functional classification network that more closely resembles the north-south network, but this is not clearly stated or supported.</p> <p>c. Visually, there does appear to be a lack of continuous east-west higher functional classification roadways in the study area. The need for this should be more clearly established. Additional information contained in the draft TSP report may be of use.</p>	<p>a. There is no set “quota” or percentage of higher vs. lower classification roadways that are required to serve a particular area, by direction or on a system-wide basis. The mixture should be dictated by need; for instance, if there was little or no demand for regional travel in a remote area, there would be no justification to provide such a facility.</p> <p>The Purpose and Need establishes that there is a need for regional east-west travel, and that there is lack of higher-type facilities to serve such travel as compared to the north-south direction. Again as in Table 1-4, the existing and projected travel demands are slightly higher in the north-south direction than the east-west direction, but almost all the existing higher-type facilities are oriented north-south. The analysis has demonstrated that east-west travel is where the greatest need is.</p> <p>b. The purpose in Section 1.5.1.1 is to “Address Lack of Continuous Higher Functional Classification East-West Routes through the Study Area”. The discussion that follows this purpose in the Purpose and Need statement describes the underlying transportation deficiencies in the study area. The purpose includes, but is not limited to, the need for east-west higher functional class type facilities. Performance measures noted previously in this response will be used to evaluate the alternatives ability to satisfy this need.</p> <p>c. The Purpose and Need document concisely establishes the need for additional capacity for regional travel in the east-west direction in the study area. The Transportation System Performance report provides a more extensive analysis of the transportation system in the study area.</p>

Commenter	Comment	Response
USACE	<p>6. Address local system deficiencies – Reduce local travel delay/Improve local travel times:</p>	
	<p>a. The date in table 1-11 indicates a forecasted increase in delay times in the study area, but does not identify where the delays will occur. Figure 4-6 shows the growth in total vehicle trips increasing at different rates throughout the study area, with generally higher increases in the northern section. The specific need should be more thoroughly established.</p>	<p>a. The Purpose and Need for this project is focusing on regional and local travel needs and not particular, location specific delays. The focus on the project is to provide better system wide connectivity and mobility rather than the individual, location specific transportation problems within the study area.</p> <p>Regional, sub-regional and Study Area measures of travel will show the effectiveness of alternatives in reducing delays. For instance, it would be unlikely that an alternative that reduced delays in only one of several problem locations would perform well in a regional, sub-regional or Study Area measure of overall travel delays.</p>
	<p>b. The purpose was not clearly defined. A measurable objective that identifies the requirements for success is needed.</p>	<p>b. The purpose in Section 1.5.2.3 of the Purpose and Need is to “Reduce Local Travel Delay/Improve Local Travel Times”. The discussion that follows this purpose in the Purpose and Need statement describes the underlying transportation deficiencies in the study area. Vehicle Miles of Travel, Vehicle Hours of Travel, and Hours of Delay are the measures that will be used to evaluate alternatives’ performance against the 2040 baseline condition.</p>
USACE	<p>7. Provide for efficient movement of truck freight – Improve accessibility for freight facilities:</p>	
	<p>a. The term “increase accessibility” should be defined. Specifically, address what is meant by accessibility, where it is lacking, and how this will be addressed.</p>	<p>a. “Accessibility” implies more free movement of freight to and from freight facilities in the directions it wants to go. The distribution of freight is in all directions from these distribution facilities, so that global improvements in the performance of truck freight are anticipated to give greater accessibility to freight facilities.</p>

Commenter	Comment	Response
	<p>b. The purpose was not clearly defined. A measurable objective that identifies the requirements for success is needed.</p>	<p>b. The purpose in Section 1.5.3.1 of the Purpose and Need is to “Improve Accessibility for Freight Facilities”. The discussion that follows this purpose in the Purpose and Need statement describes the underlying transportation deficiencies in the study area. Truck Hours of Travel and Truck Hours are the measures that will be used to evaluate alternatives’ performance against the 2040 baseline condition.</p>
USACE	<p>8. Provide for efficient movement of truck freight – Provide more efficient freight movement:</p> <p>a. The increase in truck freight traffic is not evenly distributed throughout the study area, as shown in figure 4-8 in the draft TSP report. Also, there will be large increases in truck trips moving to, from, within and through the study area. This information identifies an increase in volume, but not delay.</p> <p>b. The purpose was not clearly defined. A measurable objective that identifies the requirements for success is needed.</p>	<p>a. Table 1-11 shows the projected daily increase in vehicle miles of travel, vehicle hours of travel and hours of delay. As shown in this table, there is a 206% increase in hours of delay comparing the 2010 baseline year to the design year of 2040. Table 1-12 demonstrates the truck hours of delay also increase substantially from the 2010 baseline year to the design year.</p> <p>b. The purpose in Section 1.5.3.2 of the Purpose and Need is to “Provide More Efficient Freight Movement”. The discussion that follows this purpose in the Purpose and Need statement describes the underlying transportation deficiencies in the study area.</p> <p>The potential measures for accessibility of freight facilities and for efficient movement of freight are very similar. In the chart prepared for Public Meeting #2, South Sub-Region Truck Hours Travelled was used as a measure for freight facility accessibility, and South Sub-Region Truck Hours of Delay was used as a measure for a measure of efficient freight movement.</p>

Commenter	Comment	Response
	<p>c. The Purpose and Need document indicates that rail freight traffic growth is difficult to identify. It also cites a survey that indicates an increase in demand of 88% by 2035. The increase in truck freight and increase in demand for rail freight seems to indicate a need for addressing truck and rail freight demand. As a corridor study, options to address multiple modes of transportation should be considered.</p>	<p>c. The increase in projected rail freight demand was quantified to the extent practical in the Transportation System Performance Report and by outreach to the Class I Railroads within the Study Area, as referenced in the Technical Memorandum p. 5-7. To date, the analysis has not substantiated a need for enhancements to the rail network within the Study Area beyond what is already planned by the individual railroads.</p> <p>By using wide 2000' corridors for the Tier 1 process, multi-mode options including freight rail, could be accommodated. We will continue our outreach to the Class I freight railroads individually and through the CREATE program.</p> <p>Unsubstantiated needs in the EIS cannot be included in the Purpose and Need. The Purpose and Need point has been edited to state "provide for more efficient freight movement" – removing the word "truck" – to indicate other modes will be considered in the alternatives analysis process.</p>

9. Other comments:

<p>a. The purpose and need document does not cohesively address the stated needs and does not provide a clear framework for how, or to what extent, to address the needs. There is no clear picture as to how success will be defined. The document outlines a number of separate yet related issues, but fails to tie them together into an overall package. There is no clear indication whether these needs can be addressed through the construction of a single interstate, multiple arterials, rails, or other options. Some of this analysis will take place during the alternatives analysis, but the purpose and need has not been succinctly established to begin the formation of possible alternatives.</p>	<p>a. The Purpose and Need Statement identifies the range of transportation deficiencies that the project is intended to address. The project team will formulate and evaluate alternatives that are likely to address these issues. The measures that are included in the Purpose and Need Statement have been designed to provide a basis with which to compare alternatives relative to the "no build" scenario.</p>
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Commenter	Comment	Response
	<p>b. The purpose and need document does not address public transportation. At the recent merger meeting, it was stated that the population in the study area is forecast to increase by approximately 400,000 persons. Such an increase would appear to identify a need for improvements to the public transportation system. The stated needs of improving regional mobility and addressing local system deficiencies demands that we consider public transportation systems in a corridor level design project.</p>	<p>b. Fixed-guideway transit in an east-west direction is not projected to be a study need primarily due to not enough projected population density to justify the service, and indeed will be a long-range endeavor even north of the Study Area, a finding that was coordinated and concurred upon by the regional transit providers. For this reason, public transportation, as a need, was not identified in the Purpose and Need Statement.</p> <p>The analysis of public transportation is addressed in the Transportation System Performance Report, which is referenced by the Purpose and Need and p. 7-9 of the attached Technical Memorandum.</p>
	<p>c. The use of rail freight is not thoroughly analyzed as a viable option for dealing with the increase in freight traffic. Simply putting all of this increased freight traffic on the roadways may not be the best viable alternative. This issue should be more thoroughly addressed.</p>	<p>c. The Purpose and Need did not identify any deficiencies in terms of freight rail service in the project study area. As referenced in the Transportation System Performance Report and p. 5-7 of the attached Technical Memorandum, a review of available information on projected freight rail needs was performed, as well as an outreach to the Class I freight railroads that serve the Study Area and the Chicago region. There is not a substantiated a need for additional east-west freight service outside the facilities in place which are projected to be upgraded, as required, to meet foreseeable future freight rail demand.</p> <p>The Purpose and Need statement as written does not preclude the consideration of freight rail as an alternative mode to consider in the alternatives analysis process.</p>
	<p>d. It appears that the stated needs would be best addressed by alternatives located further north in the study area, as this is where the majority of the increase in population, employment, traffic, etc. is located. This increased need in the northern portion of the study area should be more clearly discussed and established.</p>	<p>d. We acknowledge that the growth in projected traffic will be more pronounced in the northern part of the Study area. The local system deficiencies, while being disproportionately distributed, is nonetheless a deficiency throughout the study area and is thus reflected in the Purpose and Need. The alternatives analysis process will balance transportation performance with environmental impacts to identify the best alternatives to carry forward for more detailed analysis.</p>

EXECUTIVE OFFICE OF THE PRESIDENT
COUNCIL ON ENVIRONMENTAL QUALITY
WASHINGTON, D.C. 20503

CHAIRMAN

May 12, 2003

The Honorable Norman Y. Mineta
Secretary, Department of Transportation
400 Seventh St., S.W., Room 10200
Washington, D.C. 20590

Dear Secretary Mineta:

I write in response to your [letter of May 6, 2003](#), asking for the Council on Environmental Quality's (CEQ) guidance on the issue of "purpose and need" in the context of compliance with CEQ's regulations implementing the procedural provisions of NEPA. Your letter refers to the fact that the Interagency Transportation Infrastructure Streamlining Task Force has identified "purpose and need" as a priority issue in need of clarification. Specifically, you ask for guidance on the appropriate exercise of authority by lead and cooperating agencies in determining the purpose and need.

The requirement for a discussion of "purpose and need" in an environmental impact statement under the CEQ regulations is to "briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action." 40 C.F.R. §1502.13. This discussion, typically one or two paragraphs long, is important for general context and understanding as well as to provide the framework in which "reasonable alternatives" to the proposed action will be identified.

The lead agency -- the federal agency proposing to take an action -- has the authority for and responsibility to define the "purpose and need" for purposes of NEPA analysis. This is consistent with the lead agency's responsibilities throughout the NEPA process for the "scope, objectivity, and content of the entire statement or of any other responsibility" under NEPA. 42 U.S.C. §4332(D); see also, 40 C.F.R. §§1501.5, 1506.5.

Federal courts generally have been deferential in their review of a lead agency's "purpose and need" statements, absent a finding that an agency acted in an arbitrary or capricious manner. They have recognized that federal agencies should respect the role of local and state authorities in the transportation planning process and appropriately reflect the results of that process in the federal agency's NEPA analysis of purpose and need. *North Buckhead Civic Assoc. v. Skinner*, 903 F.2d 1533 (11th Cir. 1990). Courts have cautioned agencies not to put forward a purpose and need statement that is so narrow as to "define competing 'reasonable alternatives' out of consideration (and even out of existence)", *Simmons v. U.S Army Corps of Engineers*, 120 F.3d 664 (7th Cir. 1997); (see also, *Alaska Wilderness Recreation and Tourism Association v. Morrison*, 67 F.3d 723 (9th Cir. 1995).

In situations involving two or more agencies that have a decision to make for the same proposed action and responsibility to comply with NEPA or a similar statute, it is prudent to jointly develop a purpose and need statement that can be utilized by both agencies. An agreed-upon purpose and need statement at this stage can prevent problems later that may delay completion of the NEPA process. As Congress stated in the Federal Aid Highway Act of 1973, "It is the national policy that to the maximum extent possible the procedures to be utilized by the Secretary and all other affected heads of Federal departments, agencies, and instrumentalities for carrying out this title and any other provision of law relating to the Federal highway programs shall encourage the substantial minimization of paperwork and interagency decision procedures and the best use of available manpower and funds so as to prevent needless duplication and unnecessary delays at all levels of government", 23 U.S.C. §101(e); see also, CEQ's regulations implementing NEPA at 40 C.F.R. §§1500.4, 1500.5.

In the case of a proposal intended to address transportation needs, joint lead or cooperating agencies should afford substantial deference to the DOT agency's articulation of purpose and need. 49 U.S.C. §101(b)(5). This deference reflects CEQ's expectation and experience in other settings where an agency has the primary substantive expertise and program responsibility. If a cooperating or joint lead agency identifies substantive or procedural problems with the purpose and need statement, including an omission of factors, important to that agency's independent legal responsibilities, the agency should raise those issues immediately and, if necessary, elevate those issues to higher level decisionmakers in the region and at headquarters for resolution. Thoughtful resolution of the purpose and need statement at the beginning of the process will contribute to a rational environmental review process and save considerable delay and frustration later in the decisionmaking process.

Please let me know if you have any further questions regarding this issue. Thank you for your leadership and I commend your department officials for the work they are undertaking in fulfilling the President's direction.

Sincerely,

[Original signed by]

James L. Connaughton

From: Betker, John G MVR [<mailto:John.G.Betker@usace.army.mil>]
Sent: Wednesday, January 18, 2012 10:36 AM
To: Fuller, Matt (FHWA)
Subject: Illiana Corridor Purpose and Need Concurrence Point
(UNCLASSIFIED)

Classification: UNCLASSIFIED
Caveats: NONE

Matt, after review of the information presented in the teleconference on January 13, 2012, we are able to concur on the Purpose and Need Statement for this project. As you move forward on development of alternatives, please keep us informed. We look forward to continuing our positive working relationship on this project and all of the others you bring to the table.

John Betker
NEPA/404 Merger Coordinator
Rock Island District

Classification: UNCLASSIFIED
Caveats: NONE

Commenter	Comment	Response
USEPA	USEPA does not concur with the three summary bullet points under Project Need as fully or clearly representing the underlying problems the purpose and need are to address. (Comment from Meeting) Congestion on I-80/94 and the lack of east-west routes in the study area need to be addressed.	The “global” P&N points represent the diverse transportation needs in the Study Area, the surrounding South Sub-Region and the overall Region. The sub-points more clearly define the detail of the overall global and general P&N points. Section 1.5.2.2 (Address Lack of Continuous Higher Functional Classification East-West Routes through the Study Area) devotes almost two pages to this topic, and the availability of only a single interstate route north of the Study Area, I-80/94, for regional east-west travel is mentioned in 1.5.1.1 (Address Projected Growth in Regional East-West Travel) and 1.5.3.2 (Provide More Efficient Freight Movement).
USEPA	<p>USEPA does not concur with the planning study area and reasonable termini. Although the Transportation System Performance (TSP) Report is very good, the Purpose and Need Sections 1.5.1 through 1.5.3 subheadings are used in an initial alternatives analysis that seems to redefine the needs. We recommend and could concur with the current project build needs if identified as:</p> <ul style="list-style-type: none"> • to provide Will, Kankakee and Lake Counties with one or more major multimodal east-west transportation corridors that can sustain future transportation needs of the study area and the region • to provide a bypass route for congested I-80 east-west traffic • to provide for both currently anticipated and future potential local and regional freight transportation needs 	<p>The termini for the study meet the requirements in 23 CFR 771.111(f) that a project:</p> <ul style="list-style-type: none"> • Connect logical termini and be of sufficient length to address environmental matters on a broad scope • Have independent utility or independent significance (i.e. be usable and a reasonable expenditure even if no additional transportation improvements in the area are made • Not restrict consideration of alternatives for other reasonably foreseeable transportation improvements <p>As the end points (termini) of the Illiana Corridor are not yet fixed along I-55 or I-65, there are opportunities to place them in a way that continuous east-west travel beyond the termini is best facilitated.</p> <p>Sections 1.5.1 through 1.5.3 do not contain an alternatives analysis. It documents the transportation deficiencies within the study area. Alternatives will be crafted to address the deficiencies identified in the Purpose and Need statement.</p> <p>Please note that the regional planning agencies with responsibilities in the study area have not identified a need for an extension west of I-55 or east of I-65 in their long range planning documents, either in the fiscally constrained or illustrative portion of their planning analysis.</p>

Commenter	Comment	Response
USEPA	USEPA has actively participated in the Illiana Corridor Tier I scoping, and consistently raised concerns in these areas. Some good clarifications have been made in presentation materials, but the above concerns are not addressed by the distributed materials. We e-mailed the state project managers with our standing concerns on December 21, 2012, but are not aware of any changes to be considered at this Friday meeting.	The project team appreciates the active participation and feedback received from USEPA throughout the project development process. All of the comments received from all stakeholders during the development of the Purpose and Need statement have been considered and many of the ideas and suggestions have been incorporated. In some instances, we are unable to incorporate comments because they are beyond the scope of the study or there is no data to substantiate a perceived need beyond the accepted planning horizon.
USEPA	While the planning horizon is 2040, USEPA has recommended the project take advantage of the opportunity to plan beyond 2040 for multimodal transportation needs and open space connectivity in a sustainable way. This could take the form of creating a wider reserved corridor than may be beyond the requirement for a “build” Illiana Corridor right-of-way. (Comment from Meeting) The P&N should explicitly state the need for a corridor concept looking 100 years in the future. A corridor approximately 1000 feet wide that could capture very long range needs not only of transportation modes but also utility and communication needs should be considered. This could be the last chance to preserve a corridor in the area that could accommodate future needs.	Per FHWA’s Technical Advisory T6640.8A, the purpose and need section should clearly demonstrate that a “need” exists. The Purpose and Need, as developed, uses the regional planning agencies 2040 planning horizon to document the regional transportation needs. The information collected is considered the best available information for planning transportation projects. FHWA does not consider it appropriate to speculate on needs in a NEPA document that are beyond the 2040 transportation planning horizon.

Commenter	Comment	Response
USEPA	<p>The current mandate is to build the corridor from I-65 to I-55, but we continue to recommend that use of these termini do not preclude alternatives that could eventually extend this corridor both east and west to at least reach I-80. The draft P&N statement does not clearly identify the I-80 congestion, both in the east segment where I-80/I-94 join to where I-80/I-294 diverge and in the west segment from Joliet through the I-80/I-55 interchange, as a key problem, which is outside the study area. Additionally, the Purpose and Need Section 1.3 Study Area indicates developmental growth transportation needs but does not address rural agribusiness transportation needs of the study area.</p>	<p>Please note that the regional planning agencies with responsibilities in the study area have not identified a need for an extension west of I-55 or east of I-65 in their long range planning documents, either in the fiscally constrained or illustrative portion of their planning analysis. The termini selected for this study meet the requirements in 23 CFR 771.111(f).</p> <p>The needs analysis that was completed takes into consideration the future improvements that will be made to I-80. Projects such as the recently completed I-80/94/65 interchange, the recently completed add lanes project to I-80 between US 30 and US 45, and the Phase I study to add lanes to I-80 between Ridge Road and US 30 are addressing the I-80 operational issues, and have been considered in the Illiana Corridor Study as “in place” projects by 2040. Even with these major improvements, the Study Area is still projected to have deficiencies in east-west regional travel.</p> <p>We also recognize that some trips passing through, originating or terminating in the Study Area are utilizing I-80/94 as a regional east-west facility due to a lack of better options within the Study Area. The lack of good alternatives to I-80/94 for east-west regional trips is contributing to the problems on I-80/94. However, there are many other east-west travel markets besides those using I-80/94. The study has indicated there is a demand for east-west travel south of I-80/94 that cannot be reasonably accommodated due to lack of appropriate facilities. This east-west demand includes local travel to, from, and within the Study Area, and truck traffic generated by major intermodal facilities in the Study Area.</p> <p>In the analysis of transportation deficiencies in the study area, rural agribusiness transportation needs were not determined to warrant a separate discussion within the Purpose and Need statement.</p>

Commenter	Comment	Response
USEPA	This is a corridor study and should be greater than just a road study. USEPA is concerned that it is not adequately considering all modes.	<p>The study is being developed as a Tier 1 Environmental Impact Statement consistent with the National Environmental Policy Act, the Council on Environmental Quality regulations and FHWA regulations. The goal of the Tier 1 EIS is to identify a preferred corridor or corridors that will be studied in more detail in Tier 2. The corridor(s) identified in Tier 1 will be selected and sized such that multiple modes, as appropriate, may fit within the corridor.</p> <p>Section 1.5.3 of the Purpose and Need has been revised to replace “Truck Freight” with “Freight” to more accurately reflect the deficiencies associated with moving freight within the study area and not focus on a single mode used to move freight.</p> <p>The potential for fixed guideway transit and freight rail, including coordinating directly with transit service providers and freight railroads was evaluated and the project team was were unable to substantiate a need for new or enhanced east-west facilities within the study’s planning timeframe (2040). Bus transit providers did see an opportunity to utilize an east-west highway corridor to enhance their paratransit, local and feeder services. Please see the Technical Memorandum on transit and freight rail for more background.</p>
USEPA	USEPA is not trying to dictate a multi-modal solution. We simply want to leave the options open for consideration so as not to preclude multi modes and to preserve options.	The current Purpose and Need and general study approach, by addressing transportation at a corridor level in Tier 1 (with a 2000-foot corridor and 400-foot working alignment for non-arterial alternatives) leaves room for consideration of several modes. Further refinements in the alternatives phase, and introduction of P3 opportunities, will further the potential for consideration of modes and services for which there is a demonstrated need. However, the proposed “1000-foot” wide corridor cannot be supported in a NEPA study without a substantiated need.
USEPA	We recognize your efforts with the Class I Railroads have not yet resulted in identifying a rail need. Consider approaching Class II regional and short line railroads, or state ownership of a rail corridor that could be utilized by several carriers.	We have provided a general public outreach and targeted the rail industry to solicit interest in identifying a corridor-level rail freight need. Based on our outreach, we have not identified a corridor-level rail freight need. The project team will continue coordination efforts with these stakeholders.

Commenter	Comment	Response
USEPA	FHWA's sustainability program should be considered in drafting the P&N. USEPA has concerns over conflict between sustainability effort and FHWA or state DOT policies and practices that hinder its ability to be applied.	<p data-bbox="989 282 1902 464">At this time, there is no national law or policy for implementation of sustainable transportation, and there is no currently integrated national strategy to pursue, although FHWA along with other federal agencies are beginning to discuss such strategies. NEPA and other environmental laws do provide flexibility that can help achieve sustainability goals; still, the purpose and need statement must demonstrate a clear need and not speculative needs beyond a reasonable planning horizon.</p> <p data-bbox="989 496 1902 618">Addressing other potential corridor uses, including multi-modal opportunities, will be considered in the alternatives evaluation and selection process. Further, the NEPA process will consider environmental enhancements, not just lessening impacts, to support sustainability principles.</p>



VILLAGE OF CRETE

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708/672-5431 FAX: 708/672-3920

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VILLAGE PRESIDENT
MICHAEL S. EINHORN

VILLAGE CLERK
DEBORAH S. BACHERT

VILLAGE ADMINISTRATOR
THOMAS J. DURKIN, AICP

February 14, 2012

Gentlemen,

During the time since the meeting of February 8th, I have spent a great deal of time trying to assess the travel implications of the preferred route on the movement of traffic through and around the region and the purpose and need statement for the project. I would like to address the purpose and need issue first. I personally reject the conclusion that the local "system deficiencies" will be addressed by the preferred alternative. Merely removing traffic from local roads (I-80/94 and Rt 30) is not what I believe was envisioned when the statement was drafted and agreed to. I truly believe that most envisioned a road alignment that could serve both a regional and local purpose, which I don't think is the case with the preferred alternative.

Regarding the reference to "truck freight" being removed for the wording of the P&N statement, again I personally reject the explanation. The reference to trucks was spawned primarily out of the complaint by those communities west of I-57 that are experiencing increased E-W truck traffic flowing in and out of the intermodal centers along Rt 53 and I-55.

These two sub-regional concerns illustrate that the needs are different east and west of I-57 and that the notion of a "one size fits all" P&N statement may not be the best approach for this project and needs to be re-evaluated.

Regarding the redistribution of traffic by the construction of the PA, I am requesting a disclosure of understandable data that will illustrate how that will occur. As I see it, once built, the Illiana will complete the formation of a large rectangular box bounded by I-80, I-55 and I-65, and a series of smaller internal boxes using I-57 and IL Rt 394/Rt1 and to a lesser extent Rt 41 and Rt 53. Access into and through that larger box comes by way of seven major intersections across the I-80/94 corridor and four along the proposed Illiana alignment. All of these intersections need to be evaluated to determine how and if traffic will be distributed to the Illiana, including which side of I-57 will see the most benefit and if there is an alternate alignment on the east side that will better serve the needs of that area.

Finally, it has been suggested that a Beecher By-Pass is to be built as part of this project to solve the truck traffic problem for Beecher if the Illiana passes to the south of Beecher. It is unclear at this time who will underwrite the cost of this roadway. It seems only reasonable to expect that another surface road needs to be built across the state line in the area of the Exchange Street/109th Street corridor that will solve the east-west traffic

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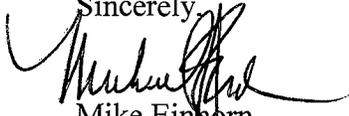
HOLLY MILBURN

MARK WATERS

problems that currently exist in the area and that are measurably greater than those experienced in Beecher. I am not sure that it would be fair to address only Beecher's issues and not those of other communities bypassed by the Illiana and expecting some sort of relief from its construction.

In closing, I am very interested in seeing the numbers from the division of traffic at each intersection before and after the Illiana is built, so I can combine them all and get a big picture understanding of what this road will accomplish.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Einhorn", with a large, sweeping flourish extending to the right.

Mike Einhorn

Village President, Crete



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 28 2012

Matthew Fuller
Environmental Programs Engineer
Federal Highway Administration, Illinois Division
3250 Executive Park Drive
Springfield, Illinois 62703

REPLY TO THE ATTENTION OF:

Re: Illiana Corridor Project Tier I EIS

Dear Mr. Fuller:

The U.S. Environmental Protection Agency (EPA), U.S. Army Corps of Engineers (ACE), and U.S. Fish and Wildlife Services (FWS) have held conversations regarding the Illiana Corridor Project. As a result, EPA is requesting on behalf of these agencies that a meeting be set up with the NEPA/404 merger group to further discuss the proposed Purpose and Need statement for the Illiana Corridor Tier I Environmental Impact Statement (EIS). We propose such a meeting be incorporated into the upcoming meetings of March 1 and 2, 2012. We have agreed to a meeting March 28, 2012, to consider concurrence with the project Alternatives. We ask that the March 1 and 2 discussion include a presentation of the range of alternatives and a discussion of factors, including the Purpose and Need screening process, that have produced a proposed narrowed range of alternatives. This narrowed range of alternatives was recently presented to the public.

We note that the recent public meetings held February 22 and 23, 2012, in Crown Point, IN and Matteson, IL respectively, presented the Illiana Corridor Project Purpose and Need as follows:

Improve Regional Mobility
Address Local System Deficiencies
Provide for Efficient Movement of Truck Freight.

We retain our concern that these three points are so general they could not be met by a single or even multiple solutions, and that they need to be specific enough that they are clearly addressing this project. At the proposed NEPA/404 merger meeting, we would like to discuss strengthening the Purpose and Need statement by drawing upon the specificity presented in supporting documents, so it is clearer what problems this project seeks to resolve, to wit:

1- By making the Purpose and Need statement more specific, the proposed alternatives can be measured by how well they meet the Purpose and Need.

2- We recommend for your consideration the following revision to the project Purpose and Need :

Create a major east - west transportation corridor through Lake County, Indiana and Will County, Illinois to:

- Improve regional and subregional mobility in the southern portion of the Chicago-Gary metropolitan area;
- Address present and anticipated east-west transportation deficiencies in and between Lake and Will Counties

- Provide for long-term efficient movement of freight across this study area,

This is a significant project that would benefit from a more robust and specific project Purpose and Need statement. Our goal is to improve the final outcome, consistent with the NEPA/ 404 merger process. We look forward to productive discussions on March 1 and 2.

Sincerely,



Kenneth A. Westlake
Chief, NEPA Implementation Section
Office of Enforcement and Compliance Assurance

Division of Historic Preservation & Archaeology • 402 W. Washington Street, W274 • Indianapolis, IN 46204-2739
Phone 317-232-1646 • Fax 317-232-0693 • dhpa@dnr.IN.gov



March 21, 2012

Matt Fuller
Environmental Programs Engineer
Illinois Division Office
Federal Highway Administration
3250 Executive Park Drive
Springfield, Illinois 62563

Federal Agency: Federal Highway Administration ("FHWA")

Re: Steven Schilke's and Greg Kicinski's letters of February 16, 2012, responding to our November 10 and December 29, 2011 comment letters, and your March 9, 2012 e-mail message providing a status update on the alternatives analysis, all with regard to Tier 1 of the Illiana Corridor Study (HPER-IL; INDOT Des. No. 1006456; DHPA No. 11913)

Dear Mr. Fuller:

Pursuant to the National Environmental Policy Act and Section 6002 of the Safe, Accountable, Flexible, and Efficient Transportation Equity Act, the staff of the Indiana State Historic Preservation Officer ("Indiana SHPO") has reviewed the aforementioned documents pertaining to the Illiana Corridor, which would be located in Lake County, Indiana and in Will County or Kankakee County, Illinois.

We appreciate Mr. Schilke's and Mr. Kicinski's responses to our previous comments.

We have no comments or questions in response to the information that was presented regarding Purpose and Need at the January 13, 2012 Illiana Corridor Study NEPA/404 Merger Team Meeting.

We also appreciate your notifying us in your March 9 e-mail message that the project team is considering feedback received from stakeholders regarding additional alternatives and that agencies such as ours are likely to receive alternatives analysis documentation in late March or early April.

Once sufficient information has been generated about the locations of remaining alternatives and about cultural resources that could be affected by those alternatives (relative to the level of identification and evaluation that is appropriate for archaeological resources and above-ground properties in a tier 1 study), we think it would be appropriate to begin to seek comments also from the consulting parties who have been invited and have agreed to participate in the review process required by Section 106 of the National Historic Preservation Act (see 36 C.F.R. § 800.4[a]).

If you have questions about issues pertaining to above-ground properties in Indiana, such as buildings or structures, then please contact John Carr at (317) 233-1949 or jcarr@dnr.IN.gov. Questions about archaeological issues in Indiana should be directed to Dr. Rick Jones at (317) 233-0953 or rjones@dnr.IN.gov. In future correspondence regarding this project, please continue to refer, when feasible, to DHPA No. 11913.

Very truly yours,

James A. Glass, Ph.D.
Deputy State Historic Preservation Officer

JAG:JLC:jlc

emc: Steven Schilke, Illiana Project Manager
Greg Kicinski, Indiana Department of Transportation
Diane O'Keefe, P.E., Illinois Department of Transportation
Kesti Susinskas, P.E., Illinois Department of Transportation PMC Project Manager
Matt Fuller, Illinois Division, Federal Highway Administration
Joyce Newland, Indiana Division, Federal Highway Administration
Laura Hilden, Indiana Department of Transportation
Ben Lawrence, P.E. Indiana Department of Transportation
Staffan Peterson, Ph.D., Indiana Department of Transportation
Mary Kennedy, Indiana Department of Transportation
Shaun Miller, Indiana Department of Transportation
Anuradha Kumar, Indiana Department of Transportation
Susan Branigin, Indiana Department of Transportation
Matt Coon, Ph.D., Indiana Department of Transportation
Melany Prather, Indiana Department of Transportation
Anne Haaker, Illinois Deputy State Historic Preservation Officer
Matt Buffington, Division of Fish and Wildlife, Indiana Department of Natural Resources
Kent Ahrenholtz, P.E., DLZ
Megan Lytle, Parsons Brinckerhoff

Division of Historic Preservation & Archaeology • 402 W. Washington Street, W274 • Indianapolis, IN 46204-2739
Phone 317-232-1646 • Fax 317-232-0693 • dhpa@dnr.IN.gov



March 21, 2012

Matt Fuller
Environmental Programs Engineer
Illinois Division Office
Federal Highway Administration
3250 Executive Park Drive
Springfield, Illinois 62563

Federal Agency: Federal Highway Administration ("FHWA")

Re: Steven Schilke's and Greg Kicinski's letters of February 16, 2012, responding to our November 10 and December 29, 2011 comment letters, and your March 9, 2012 e-mail message providing a status update on the alternatives analysis, all with regard to Tier 1 of the Illiana Corridor Study (HPER-IL; INDOT Des. No. 1006456; DHPA No. 11913)

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Very truly yours,

James A. Glass, Ph.D.
Deputy State Historic Preservation Officer

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Megan Lytle, Parsons Brinckerhoff



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

JUN 22 2012

REPLY TO THE ATTENTION OF:
E-19J

Matthew Fuller
Federal Highway Administration
3250 Executive Park Drive
Springfield, Illinois 62703

Re: **Concurrence for the Purpose and Need of the Illiana Corridor
in Lake County, Indiana and Will and Kankakee Counties, Illinois**

Dear Mr. Fuller:

Our comment letter is provided pursuant to the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act. This project is being developed using a merged process of NEPA and Section 404 of the Clean Water Act. We are a Cooperating Agency for this project and have been involved in multiple merger and related meetings, most of the Corridor Planning Group/Technical Task Force (CPG/TTF) meetings, and a site flyover during the scoping phase. We provided written scoping comments August 26, 2011, February 28, 2012, and June 8, 2012

In a November 21, 2011 Illiana merger meeting presentation, slide 35 specifically quoted the project Purpose and Need as three brief points which we had commented on earlier. The June 14, 2012 meeting materials, page 1-30, presented a revised Purpose statement which was further modified based upon discussions at that meeting. Per our June 22, 2012 phone conversation, we recommend a few further clarifying changes that we believe are consistent with the June 14, 2012 discussion.

This letter is to provide written confirmation of our concurrence with the June 22, 2012 revised Purpose and Need. Thank you for the discussions that facilitated clarifying the unique aspects of this project. Should you have any questions regarding our comments, please feel free to contact my staff member, Norm West, at 312-353-5692 or west.norman@epa.gov.

Sincerely,

for
Kenneth A. Westlake
Chief, NEPA Implementation Section
Office of Enforcement and Compliance Assurance

Cc: Soren Hall, U.S. Army Corps of Engineers
Shawn Cirton, U.S. Fish and Wildlife Service

PS2 #761

From: Shawn_Cirton@fws.gov [Shawn_Cirton@fws.gov]
Sent: Monday, June 25, 2012 4:34 PM
To: Fuller, Matt (FHWA)
Cc: Laszewski.Virginia@epamail.epa.gov; Pelloso.Elizabeth@epamail.epa.gov;
Soren.G.Hall@usace.army.mil; Westlake.Kenneth@epamail.epa.gov; West.Norman@epamail.epa.gov;
Elizabeth_McCloskey@fws.gov
Subject: RE: Illiana Corridor Purpose and Need

Matt,

Please accept this e-mail as USFWS concurrence on Purpose and Need and Alternatives to Be Carried Forward.

Shawn

Shawn Cirton
Fish and Wildlife Biologist
USFWS - Chicago Illinois Field Office
1250 South Grove Avenue, Suite 103
Barrington, IL 60010
(847)381-2253 xt.19
(847)381-2285 Fax
Wednesdays and Fridays - USACOE - (312)846-5545 <http://midwest.fws.gov/chicago>

[<Matt.Fuller@dot.gov>](mailto:Matt.Fuller@dot.gov)

06/25/2012 12:02 PM

To

[<West.Norman@epamail.epa.gov>](mailto:West.Norman@epamail.epa.gov)

cc

[<Pelloso.Elizabeth@epamail.epa.gov>](mailto:Pelloso.Elizabeth@epamail.epa.gov), [<Laszewski.Virginia@epamail.epa.gov>](mailto:Laszewski.Virginia@epamail.epa.gov),
[<Soren.G.Hall@usace.army.mil>](mailto:Soren.G.Hall@usace.army.mil), [<shawn_cirton@fws.gov>](mailto:shawn_cirton@fws.gov), [<Westlake.Kenneth@epamail.epa.gov>](mailto:Westlake.Kenneth@epamail.epa.gov)

Subject

RE: Illiana Corridor Purpose and Need

Thanks Norm - I passed your thoughts along to IDOT for consideration in including in the P&N

Shawn and Soren - Do you have an ETA for your comments/concurrence on P&N and alts?

Thanks.

Matt

From: Norman West [West.Norman@epamail.epa.gov]
Sent: Friday, June 22, 2012 4:59 PM
To: Fuller, Matt (FHWA)
Cc: Elizabeth Pelloso; Virginia Laszewski; Soren.G.Hall@usace.army.mil; shawn_cirton@fws.gov;
Kenneth Westlake
Subject: Illiana Corridor Purpose and Need

Matt,

Per our conversation this morning, thank you for the Word version of those documents. I have attached my revised version. Not many (except for the portions that are still being developed apparently that confused me) but I found needed to make it read within what we talked about. I do appreciate the rewrites done and the discussion we had Thursday morning, and that is what I am referencing in my recommended changes. I will call in a few minutes hoping you have received this then.

(See attached file: NRW6-22revised-IllianaDraftPN-Jun18 cover version.docx) (See attached file: EPAconcur-IllianaCorridor P-N6-22-12.pdf)

Norm West
NEPA Review

OECA, Region 5, E-19J 312-353-5692
U.S. EPA 312-408-2204 Fax
77 West Jackson Boulevard west.norman@epa.gov Chicago, IL 60604

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PS2 #760

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

From: Leonard, Edward

Sent: Wednesday, June 27, 2012 10:42 AM

To: Shimizu, Ronald A.; Powell, William (Rick); Lyne, Jamy L.; Ott, Steven; Malone, Robert; McGibbon, David; Tracy Morse; Rampone, Richard A.; Franck, David; mmaatkovic@cbbel.com

Cc: 16878A Illiana Expressway Tier 1 Study Project Email; Thurman, Amy

Subject: FW: NEPA-404 Merger Follow-Up documents (UNCLASSIFIED) USACE Conc on P&N and Alternatives

Concurrence from USACE on P&N and Alternatives to Carry Forward.

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

From: Schilke, Steven E [<mailto:Steven.Schilke@illinois.gov>]

Sent: Wednesday, June 27, 2012 10:08 AM

To: Leonard, Edward; Ott, Steven

Cc: Susinskas, Kesti P.

Subject: Fw: NEPA-404 Merger Follow-Up documents (UNCLASSIFIED)

Fyi

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

From: Hall, Soren G LRC [<mailto:Soren.G.Hall@usace.army.mil>]

Sent: Wednesday, June 27, 2012 10:06 AM

To: Fuller, Matt; Haaker, Anne; JCarr@dnr.IN.gov <JCarr@dnr.IN.gov>; Heacock, Dan; rjones@dnr.in.gov <rjones@dnr.in.gov>; Elizabeth_McCloskey@fws.gov <Elizabeth_McCloskey@fws.gov>;

pelloso.elizabeth@epa.gov <pelloso.elizabeth@epa.gov>; JRANDOLP@idem.IN.gov <JRANDOLP@idem.IN.gov>;

John.G.Betker@usace.army.mil>; jdavis@dnr.in.gov <jdavis@dnr.in.gov>; Chernich, Kathy G LRC <Kathy.G.Chernich@usace.army.mil>;

westlake.kenneth@epa.gov <westlake.kenneth@epa.gov>; mclark@idem.in.gov <mclark@idem.in.gov>;

mclark@idem.in.gov>; mcaffington@dnr.in.gov <mcaffington@dnr.in.gov>; Leffler, Paul M LRC <Paul.M.Leffler@usace.army.mil>;

rmcahron@dnr.in.gov <rmcahron@dnr.in.gov>; Shawn_Cirton@fws.gov <Shawn_Cirton@fws.gov>; Hamer, Steve; Savko, Terry;

Laszewski.Virginia@epamail.epa.gov <Laszewski.Virginia@epamail.epa.gov>;

West.Norman@epamail.epa.gov <West.Norman@epamail.epa.gov>; Heidi_Woeber@fws.gov <Heidi_Woeber@fws.gov>

Cc: dennis.bachman@dot.gov <dennis.bachman@dot.gov>; GKICINSKI@indot.IN.gov <GKICINSKI@indot.IN.gov>;

GKICINSKI@indot.IN.gov>; Hine, Mike; Joyce.Newland@dot.gov <Joyce.Newland@dot.gov>; Schilke, Steven E; Susinskas, Kesti P.; Zyznieuski, Walter G; lhilden@indot.in.gov <lhilden@indot.in.gov>;

GHARRIS@dot.gov <GHARRIS@dot.gov>; bruce.bender@dot.gov <bruce.bender@dot.gov>;

Neel.Vanikar@dot.gov <Neel.Vanikar@dot.gov>; Kreig.Larson@dot.gov <Kreig.Larson@dot.gov>;

Jay.DuMontelle@dot.gov <Jay.DuMontelle@dot.gov>; Kohler, Jon-Paul; Piland, Janis; Stevenson, Jerry;

Beal, Leesa LRC <Leesa.Beal@usace.army.mil>

Subject: RE: NEPA-404 Merger Follow-Up documents (UNCLASSIFIED)

Classification: UNCLASSIFIED

Caveats: NONE

Matt,

The Chicago District Army Corps concurs with Purpose and Need and Alternatives.

Thanks,
Soren

Soren Hall
Project Manager
U.S. Army Corps of Engineers - Chicago District Regulatory Branch - West Section
111 North Canal Street, 6th Floor
Chicago, Illinois 60606
312-846-5532
312-353-4110 fax

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

From: Matt.Fuller@dot.gov [mailto:Matt.Fuller@dot.gov]

Sent: Wednesday, June 20, 2012 6:50 AM

To: Anne.Haaker@Illinois.gov; JCarr@dnr.IN.gov; Dan.Heacock@illinois.gov; rjones@dnr.in.gov;
[Elizabeth McCloskey@fws.gov](mailto:Elizabeth_McCloskey@fws.gov); pelloso.elizabeth@epa.gov; Hall, Soren G LRC; JRANDOLP@idem.IN.gov;
Betker, John G MVR; jdavis@dnr.in.gov; Chernich, Kathy G LRC; westlake.kenneth@epa.gov;
mclark@idem.in.gov; muffington@dnr.in.gov; Leffler, Paul M LRC; rmcahron@dnr.in.gov;
[Shawn Cirton@fws.gov](mailto:Shawn_Cirton@fws.gov); steve.hamer@illinois.gov; terry.savko@illinois.gov;
Laszewski.Virginia@epamail.epa.gov; West.Norman@epamail.epa.gov; [Heidi Woeber@fws.gov](mailto:Heidi_Woeber@fws.gov)
Cc: dennis.bachman@dot.gov; GKICINSKI@indot.IN.gov; Mike.Hine@dot.gov; Joyce.Newland@dot.gov;
Steven.Schilke@illinois.gov; Kesti.Susinskas@Illinois.gov; Walter.Zyznieuski@illinois.gov;
Ihilden@indot.in.gov; GHARRIS@dot.gov; bruce.bender@dot.gov; Neel.Vanikar@dot.gov;
Kreig.Larson@dot.gov; Jay.DuMontelle@dot.gov; Jon-Paul.Kohler@dot.gov; Janis.Piland@dot.gov;
Jerry.Stevenson@dot.gov

Subject: NEPA-404 Merger Follow-Up documents

Importance: High

Good morning everyone -

As discussed at last week's merger meeting on June 14, 2012, I am attaching the following information:

* Per the request of the Chicago Corps of Engineers, an executive summary describing the alternatives evaluation process, including a diagram showing the process for reducing the alternatives to be carried forward to the Draft EIS to three alternatives.

* NEPA-404 Merger slides, which include the maps shown at the merger meeting and requested by multiple agencies.

* The revised Purpose and Need statement, based on discussions among the Chicago Corps, USEPA, USFWS-Barrington, IDOT, and FHWA. Changes are noted in yellow and green highlights. The Chicago Corps, USEPA, and USFWS-Barrington gave conceptual concurrence on the purpose and need based on the changes that we agreed to at the meeting, and are now documented in the attached Purpose and Need.

At this time, IDOT, INDOT, and FHWA hereby request the agencies provide concurrence on the alternatives to be carried forward.

Concurrence is confirmation by the agency that (1) The information to date is sufficient for this stage; and (2) the project may proceed to the next stage of project development. Concurrence does not imply an agency has endorsed the project or released its obligation to determine if the project meets statutory review criteria.

The following agencies have provided concurrence on the Alternatives to be Carried Forward:

- * Illinois DNR
- * Indiana SHPO
- * Illinois Department of Agriculture

Please provide concurrence on Alternatives to be Carried Forward at your earliest convenience. We will gladly accept e-mail concurrence in lieu of a letter, should that be acceptable to your agency.

As discussed at our meeting, we are offering an opportunity to discuss this information on Friday, June 22, from 9 am to 10 am (Central Time) for any agency that has additional questions. Participation in the meeting is at the discretion of each agency. The meeting will occur through teleconference using the following call-in information:

Toll Free No.: 877-336-1839

Access Code 5289000

With regard to the Purpose and Need, we hereby request concurrence from the Chicago Corps, USEPA, and USFWS on the revised statement. The Chicago Corps, USEPA, and USFWS-Barrington met on Thursday (June 14) with FHWA and IDOT to discuss concerns with the Purpose and Need. The result was modifications to the purpose and need statement that improved the quality, content, and clarity of the statement. We obtained conceptual agreement from the agencies based on changes we agreed to at the meeting; now, we formally request concurrence on the purpose and need from these three agencies.

For the agencies that have already concurred with the Purpose and Need, we invite you to review the changes as well, and if you have any concerns with the revisions, please let us know.

Thank you all for your participation and efforts to assist the transportations agencies advance this project on such an aggressive schedule. Please let me know if you have any questions or comments.

Matt Fuller

Environmental Programs Engineer

FHWA-Illinois Division Office

217-492-4625

Classification: UNCLASSIFIED

Caveats: NONE

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Appendix I
Alternatives to be Carried Forward Technical Memorandum Comments



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

JUN 29 2012

REPLY TO THE ATTENTION OF:

E-19J

Matthew Fuller
Federal Highway Administration
3250 Executive Park Drive
Springfield, Illinois 62703

Re: Concurrence for the Purpose and Need Statement and the Range of Alternatives to Be Carried Forward for the Illiana Corridor project, Will and Kankakee Counties, Illinois, and Lake County, Indiana

Dear Mr. Fuller:

Our comment letter is provided consistent with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. This project is being developed using the established merger process in Illinois for NEPA and Section 404 of the Clean Water Act.

On June 22, 2012, we provided a letter of concurrence on the June 22, 2012 version of the Purpose and Need statement. A few clarifying revisions were discussed on a phone call that day between you and Norm West of my staff. That exchange resulted in the Purpose and Need statement being revised further on June 25, 2012. We appreciate that further revisions were made in response to our recommendations. Therefore, we concur with the June 25, 2012 version of the Purpose and Need statement, and offer no additional comments.

We have reviewed the Range of Alternatives to Be Carried Forward in the Tier 1 Draft Environmental Impact Statement as presented at the project-specific merger meeting on May 25, 2012. Those alternatives are A3S2, B3, and B4. Subsequently, Norm West suggested an additional alternative, "B2," for consideration. We appreciate that B2 was evaluated by the project consultants using the project's established screening methods. On June 26, 2012, David McGibbon of Parsons Brinckerhoff shared with us the results of that evaluation and informed us why B2 would not be included in the Range of Alternatives to Be Carried Forward. We acknowledge that B2 will not be carried forward. The results of the B2 analysis will be included in the Alternatives Evaluation Report. We concur with the Range of Alternatives to Be Carried Forward as presented on May 25, 2012.

Should you have any questions concerning our concurrence on the Purpose and Need Statement and the Range of Alternatives to Be Carried Forward, feel free to contact me at 312-886-2910 and westlake.kenneth@epa.gov, or Norm West at 312-353-5692 and west.norman@epa.gov.

Sincerely,



Kenneth A. Westlake
Chief, NEPA Implementation Section
Office of Enforcement and Compliance Assurance

Cc: Soren Hall, U.S. Army Corps of Engineers
Shawn Cirton, U.S. Fish and Wildlife Service

From: Hamer, Steve
Sent: Monday, April 30, 2012 1:44 PM
To: Susinskas, Kesti P.
Subject: Illiana Corridor---Alternatives to be carried forward

Kesti:

I have reviewed the Additional Corridor Studies. The Illinois Department of Natural Resources concurs with alternatives B3, B4 and A3S2 to be carried forward along with the no-build alternative in the Tier 1 DEIS. Call if questions.

Steve Hamer
Transportation Review Program
Illinois Department of Natural Resources
Division of Ecosystems and Environment
One Natural Resources Way
Springfield, Illinois 62702-1271
Phone (217) 785-4862
Fax (217) 524-4177

PS2 # 714

From: Carr, John [<mailto:JCarr@dnr.IN.gov>]

Sent: Friday, May 25, 2012 04:53 PM

To: Rampone, Richard A.

Cc: Jones, Rick <RJones@dnr.IN.gov>; Buffington, Matt <MBuffington@dnr.IN.gov>; joyce.newland@dot.gov <joyce.newland@dot.gov>; Carpenter, Patrick A <PACarpenter@indot.IN.gov>; Kumar, Anuradha <akumar@indot.IN.gov>; Branigin, Susan <sbranigin@indot.IN.gov>; Coon, Matthew <mcoon@indot.IN.gov>

Subject: Illiana "Alternatives to be Carried Forward Technical Memo"

Rick,

It was good to see you again today and to learn that you're Parsons Brinckerhoff's lead person for Indiana on the Illiana Corridor Study.

I've shared the gist of our lengthy meeting today with Dr. Rick Jones, who is my co-reviewer for the archaeological issues, on behalf of Indiana DNR-DHPA/Indiana SHPO on Illiana. Please continue to include Rick (RJones@dnr.in.gov) in any e-mails about Illiana.

I have a few questions at this point. I thought I recalled having seen, within the last few weeks, a colored map of the three Illiana build alternatives still under consideration that showed locations of known historic or potentially historic properties. I may have found on page 18, Figure 2-8, of the ACFTM the map that I had seen, although it does not show potentially historic properties, just National Register of Historic Places-listed properties and those that have previously been determined eligible for the National Register. That map, however, does not show the three build alignments. Also, the scale of that map is fairly small, and some of the symbols for listed properties in Indiana overlap, so it's hard to tell how many of them are at a particular location.

Is there currently available a map similar to Figure 2-8 that also has alternatives A3S2, B3, and B4 superimposed on it, similar to the way they're superimposed on Figure 5-1 in the ACFTM?

Is there currently available a list of the Indiana properties that were represented symbolically on Figure 2-8?

It's my impression (see page 19 of ACFTM) that a researcher from, or working for, PB gathered buildings and structures survey information and perhaps archaeological site information from records here at Indiana DNR-DHPA, which presumably would have included both NR-listed properties and others that were sufficiently significant to have been surveyed but may or may not be significant enough or have enough historical integrity to be eligible for the National Register. Does Table 4-5 in the ACFTM reflect only listed or determined eligible properties, or does it also include documented archaeological sites that may not be NR-eligible?

If no properties have been included in Table 4-5—other than possibly archaeological sites—that have been surveyed or otherwise documented in DHPA's records or in the Indiana Historic Bridge inventory, except those that have been listed in or determined eligible for the NR, why is that the case?

We're assuming that none of the properties symbolically depicted on Figure 2-8 are *archaeological* sites, because the locations of such sites should not be disclosed on maps that the general public might see,

because of the risk of illegal digging. Publicly interpreted above-ground archaeological features, such as those at Mounds State Park in Indiana, are not subject to the same degree of confidentiality.

No need to rush to respond. Rick and I won't be getting back to reviewing the ACFTM before the middle of next week, at the earliest. We do intend to prepare our formal letter several days in advance of the June 15 concurrence point meeting, however, to make sure we have our superiors' approval on what we will say at the meeting.

The following mailing address is the appropriate one for sending printed materials for Rick's and my review, in order to obtain comments from Indiana DNR-DHPA/Indiana SHPO:

James A. Glass, Ph.D.
Director
Division of Historic Preservation and Archaeology
Indiana Department of Natural Resources
402 West Washington Street, Room W274
Indianapolis, Indiana 46204

Thanks!

Have a safe and enjoyable holiday weekend!

John L. Carr
IDNR-DHPA
Phone: (317) 233-1949
Fax: (317) 232-0693
E-mail: JCARR@DNR.IN.GOV

June 13, 2012

Mr. John Carr
Division of Historic Preservation and Archaeology
Indiana Department of Natural Resources
402 West Washington Street, Room W274
Indianapolis, Indiana 46204

Dear Mr. Carr:

Thank you for the comments you submitted in your May 25, 2012 e-mail to Rick Rampone. The Illinois Department of Transportation (IDOT) and Indiana Department of Transportation (INDOT) offer the following responses to the questions and concerns you presented.

Question 1: I thought I recalled having seen, within the last few weeks, a colored map of the three Illiana build alternatives still under consideration that showed locations of known historic or potentially historic properties. I may have found on page 18, Figure 2-8, of the ACFTM the map that I had seen, although it does not show potentially historic properties, just National Register of Historic Places-listed properties and those that have previously been determined eligible for the National Register. That map, however, does not show the three build alignments. Also, the scale of that map is fairly small, and some of the symbols for listed properties in Indiana overlap, so it's hard to tell how many of them are at a particular location.

Response 1: The ACFTM only addresses known historic properties – those listed in or previously determined eligible for listing in the National Register of Historic Places (NRHP). Properties meeting the 50 year age criterion that may be eligible for the NRHP were identified in the Lake County 1996 Interim Report and presented in the Tier One DEIS; however, no determinations of eligibility have been completed. The intent of Figure 2-8 is to show the above ground properties as constraints to be used in the selection of the candidate corridors, rather than to display impacts to those historic properties by the candidate corridors.

Question 2: Is there currently available a map similar to Figure 2-8 that also has alternatives A3S2, B3, and B4 superimposed on it, similar to the way they're superimposed on Figure 5-1 in the ACFTM?

Response 2: Yes, a map showing the identified historic properties in the context of the three candidate corridors has been prepared for the Tier One DEIS, and is attached for your information.

Question 3: Is there currently available a list of the Indiana properties that were represented symbolically on Figure 2-8?

Response 3: Yes, a list of the NRHP-listed and previously determined eligible Indiana properties shown in Figure 2-8 is available, and is attached for your information.

Question 4: It's my impression (see page 19 of ACFTM) that a researcher from, or working for, PB gathered buildings and structures survey information and perhaps archaeological site information from records here at Indiana DNR-DHPA, which presumably would have included both NR-listed properties and others that were sufficiently significant to have been surveyed but

may or may not be significant enough or have enough historical integrity to be eligible for the National Register. Does Table 4-5 in the ACFTM reflect only listed or determined eligible properties, or does it also include documented archaeological sites that may not be NR-eligible?

Response 4: Table 4-5 includes only NRHP-listed and previously determined eligible above ground properties, and documented archaeological sites within each of the 400-foot working alignments and within a mile on either side of each of the 2,000-foot corridors for the Area of Potential Effects. The table incorporates information obtained from the Indiana DNR-DHPA office in December 2011, including IHSSI survey information on aboveground resources for Lake County and a records check to identify surveyed properties that had since been determined eligible for past projects.

Question 5: If no properties have been included in Table 4-5—other than possibly archaeological sites—that have been surveyed or otherwise documented in DHPA's records or in the Indiana Historic Bridge inventory, except those that have been listed in or determined eligible for the NR, why is that the case?

Response 5: Through development of the ACFTM, FHWA, IDOT, and INDOT commented that unknowns should not be used when reporting impacts; therefore, only known NRHP-listed or previously determined eligible properties were included in the ACFTM. For the DEIS, the responsibility is disclosure of known and/or potential environmental resources, and therefore, previously identified resources meeting the 50 year age criteria, but that have not yet been formally determined eligible, have been included. Eligibility and effects determinations to address the NRHP status of all potentially eligible properties in the APE will be undertaken as part of the Tier Two NEPA studies.

Question 6: We're assuming that none of the properties symbolically depicted on Figure 2-8 are archaeological sites, because the locations of such sites should not be disclosed on maps that the general public might see, because of the risk of illegal digging. Publicly interpreted above-ground archaeological features, such as those at Mounds State Park in Indiana, are not subject to the same degree of confidentiality.

Response 6: There are no archaeological sites depicted on Figure 2-8.

Again, we thank you for your comments and assistance regarding our Study process and we look forward to your continued participation in our Study activities. Please visit our website at www.illianacorridor.org for the most current information on the development of this project.

Sincerely,



Steve Schilke, P.E.
Consultant Studies Unit Head
Illiana Project Manager



Greg Kicinski, P.E.
Director of Project Management
Indiana Department of Transportation

**NRHP-Listed and Previously Determined Eligible Historic Properties in Lake County, Indiana
December 30, 2011**

Name and NRHP Status	Resource Survey Number	Location or Address	Property Type, Date of Construction	IHSSI Rating
Lowell Commercial Historic District <i>NRHP-Listed 2003</i>	NRIS 03000144 IHSSI 089-370-92001-042	305-519 Commercial Avenue; 108-110 Clark Street, Lowell 46356	District, circa 1870-1952	Not Ranked
Crown Point Courthouse Square Historic District <i>NRHP-Listed 2004</i>	NRIS 04000203 IHSSI 089-142-76001	Roughly bounded by Clark Street, the alley east of Main Street, Hack Court, and Court Street. Crown Point 46037	District, 1873-1940	Not Ranked
Crown Point Courthouse Square Historic District (boundary amendment) <i>NRHP-Listed 2005</i>	NRIS 05001464 IHSSI 089-142-76001-70	Roughly bounded by Robinson, East, Walnut, and Court streets. Crown Point 46037	District, 1847-1940	Not Ranked
Crown Point Courthouse Square Historic District (Boundary Increase II) <i>NRHP-Listed 2007</i>	NRIS 07000210 IHSSI 089-142-76001	208 Main Street, Crown Point 46037	District, 1936-1940	Not Ranked
Buckley Homestead <i>NRHP-Listed 1984</i>	NRIS 84000503 IHSSI 089-370-90035	3606 Belshaw Road, Lowell 46356	District (Farmstead), 1849, 1853- 1940	Outstanding
Morgan-Skinner-Boyd Homestead <i>NRHP-Listed 2010</i>	NRIS 10001079 IHSSI 089-142-66007	111 East 73 rd Avenue, Merrillville 46410	District (Homestead), 1877	Outstanding
Wood, John, Old Mill <i>NRHP-Listed 1975</i>	NRIS 75000026 IHSSI 089-494-65006	9410 Old Lincoln Highway, Hobart 46342	Building (Mill), 1838	Outstanding
Halsted, Melvin A., House <i>NRHP-Listed 1978</i>	NRIS 78000037 IHSSI 089-370-93067	201 E. Main Street, Lowell 46356	Building (House), 1850	Outstanding
Lassen Hotel <i>NRHP-Listed 1981</i>	NRIS 81000019 IHSSI 089-370-81159	7808 W. 138 th Place, Cedar Lake 46303	Building (Hotel), 1895, 1920	Outstanding
Meyer, Joseph Ernest, House <i>NRHP-Listed 1984</i>	NRIS 84001068 IHSSI 089-565-60010	1370 Joliet Street, Dyer 46311	Building (House), 1929-1931	Outstanding
Lake County Sheriff's House and Jail <i>NRHP-Listed 1989</i>	NRIS 88003039 IHSSI 089-142-76043	232 South Main Street, Crown Point 46307	Building, 1882	Outstanding
Ross, John, Farm <i>NRHP-Listed 1996</i>	NRIS 96000283	3815 East SR 231, Crown Point 46307	District (Farmstead), 1871	Not Ranked

Name and NRHP Status	Resource Survey Number	Location or Address	Property Type, Date of Construction	IHSSI Rating
Whitaker, William, Landscape and House <i>NRHP-Listed 1999</i>	NRIS 99001107	472 South Main, Crown Point 46307	Building (House), Site, 1929	Not Ranked
Monon Park Dancing Pavilion <i>NRHP-Listed 2001</i>	NRIS 00001540 IHSSI 089-370-82010	13701 Lauerman Street, Cedar Lake 46303	Building, 1897, 1915	Outstanding
Clark, Wellington A., House <i>NRHP-Listed 2001</i>	NRIS 01000619 IHSSI 089-142-79202	227 South Court Street, Crown Point 46307	Building (House), 1847	Notable
Lake County Sanatorium Nurses Home <i>NRHP-Listed 2005</i>	NRIS 05000608 IHSSI 089-142-65068	2323 North Main Street, Crown Point 46307	Building (House), 1930	Outstanding
Kingsbury-Doak Farmhouse <i>NRHP-Listed 2005</i>	NRIS 05001013 IHSSI 089-352-95007	4411 East 153 rd Avenue, Hebron 46341	District (Farmstead), circa 1860- 1883	Notable
Rumsey, J. Claude House <i>NRHP-Listed 2008</i>	NRIS 08001211 IHSSI 089-370-93013	709 Michigan Avenue, Lowell 46356	Building (House), 1906	Outstanding
Lake County Courthouse <i>NRHP-Listed 1973</i>	NRIS 73000073 IHSSI 089-142-76036	Public Square, Crown Point 46307	Building, 1878	Outstanding
Allman, Walter, House <i>NRHP-Listed 2010</i>	NRIS 10001077 IHSSI 089-142-79135	102 South East Street, Crown Point 46307	Building (House), 1902	Notable
Brannon, James, House <i>NRHP- Listed 2011</i>	NRIS 11000120 IHSSI 089-370-93039	260 Burnham Street, Lowell 46356	Building (House), circa 1898	Not Ranked
Albert Maack House, 1913 <i>NRHP-Listed 2011</i>	NRIS 11000383 IHSSI 089-142-77046	498 Court Street, Crown Point 46307	Building (House), circa 1913	Not Ranked
Charles E. Nichols House <i>NRHP-Listed 2010</i>	NRIS 10000375 IHSSI 089-370-93190	231 West Commercial Avenue, Lowell 46356	Building (House), circa 1902	Outstanding
263 Clark Street <i>Previously Determined NRHP-Eligible 2009</i>	IHSSI 089-370-93019	263 Clark Street, Lowell 46356	Building (House), circa 1900	Notable
228 West Main Street <i>Previously Determined NRHP-Eligible 2009</i>	IHSSI 089-370-93025	228 West Main Street, Lowell 46356	Building (House), circa 1890	Notable
251 Burnham Street <i>Previously Determined NRHP-Eligible 2009</i>	IHSSI 089-370-93039	251 Burnham Street, Lowell 46356	Building (House), circa 1900	Outstanding
Lowell Public School <i>Previously Determined NRHP-Eligible 2009</i>	IHSSI 089-370-93060	525 East Main Street, Lowell 46356	Building (School), 1896	Outstanding
Lowell Methodist Episcopal Church	IHSSI 089-370-93123	520 East Commercial Avenue,	Building (Church), 1924-1925	Outstanding

Name and NRHP Status	Resource Survey Number	Location or Address	Property Type, Date of Construction	IHSSI Rating
<i>Previously Determined NRHP-Eligible 2001</i>		Lowell 46356		
Carlson Farmstead <i>Previously Determined NRHP-Eligible 2007</i>	IHSSI 089-142-75003	2208 East 109 th Avenue, Crown Point 46307	District (Farmstead), circa 1910	Notable
South Court Street Historic District <i>Previously Determined NRHP-Eligible 1999</i>	IHSSI 089-142-77001-70	Bounded by West South Street, East South Street, South Court Street, South Main Street, and South East Street. Crown Point 46307	District, 1860, 1890-1920	Not Ranked
Lake County Fairgrounds – Milroy Covered Bridge <i>Previously Determined NRHP-Eligible</i>	IHSSI 089-142-78002 Bridge Record Number HB-2004	Gulley in Fairgrounds, Crown Point 46307	Structure (Bridge), 1878	Outstanding
Lake County Fairgrounds – Fine Arts Building <i>Previously Determined NRHP-Eligible 2005</i>	IHSSI 089-142-78003	Lake County Fairgrounds, Crown Point 46307	Building, circa 1926	Outstanding
Von Hollen House <i>Previously Determined NRHP-Eligible 2004</i>	IHSSI 089-565-81045	12828 Parrish Avenue, Cedar Lake 46303	Building (House), 1838	Outstanding
Holy Name Catholic Church and Cemetery <i>Previously Determined NRHP-Eligible 2004</i>	IHSSI 089-565-81057	11000 West 133 rd Avenue, Cedar Lake 46303	Building (Church, 1932); Site (Cemetery, 1865-present)	Notable
Saints Peter and Paul Church <i>Previously Determined NRHP-Eligible 2004</i>	IHSSI 089-232-65058	5885 Harrison Street, Merrillville 46410	Building (Church), circa 1916	Outstanding
Railroad Bridge <i>Previously Determined NRHP-Eligible 2004</i>	IHSSI 089-275-60002	Off Junction Avenue, St. John Township	Structure (Bridge), circa 1910	Outstanding
9260 Patterson Street <i>Previously Determined NRHP-Eligible 1998</i>	IHSSI 089-565-60025	9260 Patterson Street, St. John 46373	Building (House), circa 1880	Outstanding
9278 Patterson Street <i>Previously Determined NRHP-Eligible 2008</i>	IHSSI 089-565-63003	9278 Patterson Street, St. John 46373	Building (House), circa 1910	Notable
St. John the Evangelist Church <i>Previously Determined NRHP-Eligible 2008</i>	IHSSI 089-565-63004	9400 Wicker Avenue, St. John 46373	Building (Church), 1925	Outstanding
Lake County Bridge No. 36 <i>Previously Determined NRHP-Eligible 1984</i>	IHSSI 089-294-95032 Bridge Record Number HB-09655	Range Line Road over Kankakee River, Eagle Creek Township	Structure (Bridge), circa 1900	Outstanding
Indiana State Highway Bridge #41-56-1489JBSB <i>Previously Determined NRHP-Eligible 1989</i>	Bridge Record Number HB-1266	US-41 (NB) over Kankakee River, West Creek Township	Structure (Bridge), Date Unknown	Not Ranked

Name and NRHP Status	Resource Survey Number	Location or Address	Property Type, Date of Construction	IHSSI Rating
Lake County Bridge #2 <i>Previously Determined NRHP-Eligible 1984</i>	Bridge Record Number HB-0957	Clay Street over Kankakee River, Eagle Creek Township	Structure (Bridge), Date Unknown	Not Ranked

From: Buffington, Matt [mailto:MBuffington@dnr.IN.gov]
Sent: Tuesday, June 05, 2012 3:29 PM
To: Rampone, Richard A.
Subject: questions/comments on Illiana alternatives analysis

Rick,

A few items of consideration that came up during my review.

1) I will not be providing official comments until the revised table is provided and differences are explained. "Refinements" should also be explained. That may include mistakes, intentional and non-intentional double counting, changes to categories, etc. Changes to impacts for the various alternatives may also need to be corrected in the text. In other words, don't just send a corrected table. Make sure the text corresponds with the corrections. For example, see the first bullet on page 67 and the most recent table.

Memo will be issued shortly to discuss the differences in reporting. In summary there is a combination of refinements, measurement display changes and new data that causes the differences in tables. The changes are in part due to response to comments requesting additional data, soliciting newer versions of baseline information and modifications to alternatives.

2) Being a biologist and not a highway engineer, some numbers included in the document are lost on me. For instance, the table on page 6, middle row, right-hand cell, last bullet point: I have no context to know if these numbers are high, normal, or low.

Refer to the Transportation systems performance report for the context of the summary table.

3) Exactly what constitutes the "northern alternatives" (asked in reference to the discussions on pages 67 and 68, but probably elsewhere as well)? Alternative B1 includes a central and northern portion. Is it a central alternative? Northern? A discussion that separates impacts based on the north/central/south location is difficult to understand if alternatives don't fit the criteria of the comparison.

Northern Alternatives would constitute any alternative with an "A" connection point that continues north of the South suburban airport footprint. Central alternatives are focused on alts that originate near Wilmington and connect to I-65 by going south of the south suburban airport footprint. Southern alternatives originate south of the braidwood nuclear power plant and connect at the terminus on I-65 just north of the kankakee river. The attached slide explains the constraints that define the north and central zones.

4) The evaluation criteria "new lane miles of interstate" (page 43) still seems like an odd value. I would consider this criteria a bit lower priority than other criteria as a longer road may provide better avoidance of resources. There is probably a balance somewhere between length of road and avoiding impacts while still providing for better east-west traffic. Where that balance is, I have no idea.

New lane miles of interstate is a reported fact and not used in the evaluation or determination of the alternatives performance. This measure however does respond to the purpose and need point that there is a lack of higher functional class roadways within the study area of approx 1000 square miles.

5) On page 48, second paragraph under 3.2.3. Is it the normal practice to use a 400' working alignment located more-or-less centrally within each 2000' corridor when making initial reviews of impacts?

400' is a conservative but reasonable impact zone assessment for a working alignment width on a access controlled facility. This was proposed during the scoping process and received no comment.

6) On page 49, bullets 3 and 4, this results in some amount of double counting but using different units. Not sure if there is a better way to deal with this.

7) The color coding makes for quick comparisons. However, such quick comparisons may lead to less than ideal decisions. Given any random evaluation criteria, if the differences are small, the third least impacting alternative will not be highlighted but may not be that much greater to think it is not a good choice (eg, does 2 more miles of alignment length mean an alternative isn't within the same ballpark as the least impacting alternative?). Graphic representations, like a bar graph, can provide a better understanding of the impacts for each alternative and help group alternatives by level of impacts for each criteria.

To bar graph the results for screening or travel performance would require scaling (read weighting) of results within the range of the selected alternatives or through an arbitrarily range set for the data. This would demonstrate a similar trend to the impact charts high medium and low approach but would not offer the reviewers the opportunity to see the magnitude of the impacts per alignment. subsequent drafts will report all impact categories.

8) Please explain why Alternative B4 would have reduced truck traffic compared to A3S2 and B3 (4.1.1). I think I know why but there's no reason for me to make assumptions that may be incorrect.

The truck traffic volumes represent a significant national movement over the proportion of local movement. When the alternative provides a lower adverse travel factor for a national movement more truck traffic is generated.

Alternative B4 provides a travel movement that does not capture or supply regional or local travel movements and is in conflict with the national travel model directional results as well.

9) Has there been any discussion of creating a “Y” shaped corridor, with the “v” part of the Y coming from the north and south ends of Midewin then joining somewhere near 45/52 (or the diagonal associated with A3S1)? I guess you could think of it as B3 with a north spur to A. Obviously this means more roadway built and more impacts, but comments within the document suggest having a connection at A or B has pluses and minuses, and maybe having both would be viewed as a possibility. I would just like to know about other alternatives that may be reviewed. Such a north spur would cut about 7 miles off the travel distance for people traveling west from I-65 and wanting to go north on I-55.

Including multiple terminus points on I-55 have been considered however the “A” connection point will cause significant built and environmental impacts regardless of configuration while producing limited travel benefits.

10) Not all floodplain acres are created the same. Farmland in the floodplain is not the same as forestland in a floodplain. It would be helpful to have the floodplain acreage separated out a bit.

All of the impact statistics can be reported to the needs of the reviewing agency. The technical memorandum is developed based on the most common reporting categories of interest for new construction projects but has also been updated in the DEIS draft to reflect additional detail requested during coordination meetings with various resource agencies. The reporting summaries will be supported by the unfiltered data set appendix in future reports allowing the agencies to determine which categories are most important from their jurisdictional basis.

11) The information regarding listed species will need to be fleshed out more. The age of the records and the species involved will influence whether there is likely to be an impact or not.

The DEIS will report the specific details for listed species and any special circumstances. The data aging for this category was identified in the scoping documents however the study team has endeavored to update any available records during each milestone screening and not discovered any significant findings.

12) This was brought up during the meeting but using “the southern route was the longest alternative” as a reason not to forward it for consideration is a poor decision factor. It has to be longer given the geometry of other interstates. There appear to be other reasons for not forwarding it which is fine.

From a constructibility standpoint a longer alternative will have a higher initial cost and must more substantial long term life cycle cost. In addition to capitol costs we consider vehicle miles traveled, vehicle hours traveled and potential for causing socio or environmental impacts route length as a significant factor. If an alternative is 1 mile longer with an average ADT of 30K it will cause 30k vehicles to travel an extra 1 mile per day that results in an additional \$720,000 lost in travel time costs or 1500 gallons of fuel being consumed every single day to traverse that alternative. These costs have a direct impact on the users as well as the environmental impacts.

13) The second paragraph on page 58 is a discussion regarding the refinement near Governors State. Figure A-4 does not do a good job of showing the interchange spacing so understanding the constraint is difficult.

Governors state university is located in University Park, while the university campus would be substantially impacted by the proposed alternatives this is only one minor factor. The placement of the alternative is determined by the constraints adjacent to the university as well as the university footprint itself. In this case when we observe the requirements to place a new system interchange on I-57 and minimize impacts to existing built business zones in university part we also are forced to move north of the east west route, this shift forces the new alternative to impact not only the proposed campus but an existing commuter station that serves the campus.

14) I may just be misreading it, but the 3rd paragraph on page 69 seems to contradict itself (concerns federally listed species). The first sentence states there would be no impact on listed species. The 3rd sentence states potential impacts would be determined in Tier 2. I would like to think the second statement is correct since the amount of field work conducted at this point is limited and a final alignment is unknown.

15) I believe the correct figure citation in the first paragraph on page A-14 is "Figure A-13" not 3-14. Also, I can't figure out the "current corridor" in Figure A-14. Is this in reference to the original corridor or Figure A-13? Neither seems correct if you look at the current and proposed in Figure A-13. In Figure A-14, there is a green square with what looks like a house in the NE quadrant where A3S1 and the current corridor intersect. In figure A-13 there is no corridor that close to the green square. Something isn't matching up properly.

Those are the comments I have so far.

Matt Buffington
Environmental Supervisor
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June 14, 2012

Matt Buffington
Environmental Supervisor
Division of Fish and Wildlife
IN Department of Natural Resources
402 W. Washington St., Room W273
Indianapolis, IN 46204

Dear Mr. Buffington:

Thank you for the comments and questions you emailed to Mr. Rick Rampone at Parsons Brinckerhoff on June 5, 2012 regarding the Alternatives to be Carried Forward Technical Memorandum (ACFTM.) Please find our responses to your comments and questions below.

Question 1: I will not be providing official comments until the revised table is provided and differences are explained. "Refinements" should also be explained. That may include mistakes, intentional and non-intentional double counting, changes to categories, etc. Changes to impacts for the various alternatives may also need to be corrected in the text. In other words, don't just send a corrected table. Make sure the text corresponds with the corrections. For example, see the first bullet on page 67 and the most recent table.

Response 1: The tables included with the ACFTM released for comment on April 25th are a valid tool for the Round 1 and Round 2 screening process. More detailed information about the updates that have occurred and their impact on screening data can be found in the attached memorandum.

Question 2: Being a biologist and not a highway engineer, some numbers included in the document are lost on me. For instance, the table on page 6, middle row, right-hand cell, last bullet point: I have no context to know if these numbers are high, normal, or low.

Response 2: The April 26, 2012 version of the Transportation Systems Performance Report (available online at http://www.illianacorridor.org/information_center/library.aspx) may be of use to you in providing greater context of the summary table in the ACFTM. Pages 123-137 have more detailed information regarding traffic safety and crash history. There are identified locations within the Study Area that have a history of high crashes, and a point is made that higher classification highways such as interstates generally have lower crash rates than lower classification roadways, and that an increase in traffic on lower classification roadways by the year 2040 could lead to an increase in crashes based on that experience. However, improving safety, while considered to be important in all transportation projects, is not an explicit need stated in the project Purpose and Need Statement.

Question 3: Exactly what constitutes the "northern alternatives" (asked in reference to the discussions on pages 67 and 68, but probably elsewhere as well)? Alternative B1 includes a central and northern portion. Is it a central alternative? Northern? A discussion that separates impacts based on the north/central/south location is difficult to understand if alternatives don't fit the criteria of the comparison.

Response 3: Northern corridors alternatives would constitute any corridor with an "A" connection point that continues north of the South Suburban Airport footprint. Central corridor alternatives are focused on corridors that originate near Wilmington and connect to I-65 by going south of the South Suburban Airport footprint. Southern corridor alternatives originate south of the Braidwood nuclear power plant and connect at the terminus on I-65 just north of the Kankakee River. Corridor B1 is somewhat of a hybrid due to the constraints of the north and central corridors. Also, please note that impacts are not being "categorized" based on north, central and/or south zones. These are locational descriptors to describe similar impacts/issues applicable to multiple corridors. The impacts are quantified for each individual corridor.

Question 4: The evaluation criteria "new lane miles of interstate" (page 43) still seems like an odd value. I would consider this criteria a bit lower priority than other criteria as a longer road may provide better avoidance of resources. There is probably a balance somewhere between length of road and avoiding impacts while still providing for better east-west traffic. Where that balance is, I have no idea.

Response 4: New lane miles of interstate are a reported fact and not used in the evaluation or determination of the corridor alternatives' performance, as such we did not shade best performing with green or worst performing with orange. However, this measure does respond to the Purpose and Need point that there is a lack of higher functional class roadways within the study area of approximately 950 square miles.

Question 5: On page 48, second paragraph under 3.2.3. Is it the normal practice to use a 400' working alignment located more-or-less centrally within each 2000' corridor when making initial reviews of impacts?

Response 5: 400' is a conservative but reasonable impact zone assessment for a working alignment width on an access controlled facility and has been used on other projects, including the recent I-69 project in Indiana. This was proposed during the scoping process and received no comment. In the Tier Two studies, it is expected that the working alignments will be further refined in location and width.

Question 6: On page 49, bullets 3 and 4, this results in some amount of double counting but using different units. Not sure if there is a better way to deal with this.

Response 6: The tabulation in the Draft Environmental Impact Statement will include water bodies (lakes and ponds; in acres) tabulated separately from streams (by number).

Question 7: The color coding makes for quick comparisons. However, such quick comparisons may lead to less than ideal decisions. Given any random evaluation criteria, if the differences are small, the third least impacting alternative will not be highlighted but may not be that much greater to think it is not a good choice (e.g., does 2 more miles of alignment length mean an alternative isn't within the same ballpark as the least impacting alternative?). Graphic representations, like a bar graph, can provide a better understanding of the impacts for each alternative and help group alternatives by level of impacts for each criteria.

Response 7: Bar graphing the results for screening or travel performance would require scaling (or weighting) of results within the range of the selected corridor alternatives or through an arbitrarily range set for the data. This detail would also ultimately lead to a generalization of overall impacts having a similar trend as the impact charts' high, medium and low approach, but

would not offer the reviewers the opportunity to see the magnitude of the impacts per alignment. The Alternatives Evaluation Report, which will be released around the same time as the Draft Environmental Impact Statement (DEIS) mid-summer 2012, will provide a more-detailed report of impacts. Subsequent drafts will report all impact categories.

Color coding has been an agreed approach and scaling/weighting/scoring was eliminated based on previous review comments. In addition, the color coding has been used for public discussion, without objection and therefore was used to be consistent.

Question 8: Please explain why Alternative B4 would have reduced truck traffic compared to A3S2 and B3 (4.1.1). I think I know why but there's no reason for me to make assumptions that may be incorrect.

Response 8: The truck traffic volumes represent a significant national movement over the proportion of local movement. When the corridor alternative provides lower adverse, or out of direction, travel for a national movement, more truck traffic is generated. Alternative B4 provides a travel movement that captures less desired regional or local travel movements, and is in conflict with the national travel model directional results. Our travel models indicate, where diagonal movements such as contained in Corridor B4 exist, southwest-to-northeast movements (and vice versa) are more in demand than northwest-to-southeast movements such as exhibited by the eastern part of B4. A3S2 is located closer to population centers that generate more local truck traffic in addition to the regional/national truck traffic.

Question 9: Has there been any discussion of creating a "Y" shaped corridor, with the "v" part of the Y coming from the north and south ends of Midewin then joining somewhere near 45/52 (or the diagonal associated with A3S1)? I guess you could think of it as B3 with a north spur to A. Obviously this means more roadway built and more impacts, but comments within the document suggest having a connection at A or B has pluses and minuses, and maybe having both would be viewed as a possibility. I would just like to know about other alternatives that may be reviewed. Such a north spur would cut about 7 miles off the travel distance for people traveling west from I-65 and wanting to go north on I-55.

Response 9: Including multiple terminus points on I-55 have been considered. The alignment of existing US 52 approximates the Y, and is included in the network of each alternative's travel model. The "A" connection point will cause substantial built and environmental impacts regardless of configuration.

Question 10: Not all floodplain acres are created the same. Farmland in the floodplain is not the same as forestland in a floodplain. It would be helpful to have the floodplain acreage separated out a bit.

Response 10: All of the impact statistics can be reported to the needs of the reviewing agency. The impacts summaries reported in the technical memorandum is developed based on the most common reporting categories of interest for new construction projects but has also been updated in the DEIS to reflect additional detail requested during coordination meetings with various resource agencies. The reporting summaries will be supported by the unfiltered data set appendix in future reports allowing the agencies to determine which categories are most important from their jurisdictional basis.

Question 11: The information regarding listed species will need to be fleshed out more. The age of the records and the species involved will influence whether there is likely to be an impact or not.

Response 11: The DEIS will report the details for listed species and their respective status. The data aging for this category was identified in the scoping documents; however, the study team has endeavored to update any available records during each milestone screening and not discovered any significant findings.

Question 12: This was brought up during the meeting but using “the southern route was the longest alternative” as a reason not to forward it for consideration is a poor decision factor. It has to be longer, given the geometry of other interstates. There appear to be other reasons for not forwarding it, which is fine.

Response 12: Alternative corridor C4 was set aside primarily because it performed more poorly than the other limited access alternatives by a wide margin in most travel measures. Corridor C4 required routing around the Kankakee River state Park and the Colchester mines located throughout the area, creating a corridor that was nearly 58 miles in length. A longer corridor will have a higher initial cost and higher long term life cycle cost from a constructability standpoint. In considering vehicle miles traveled, vehicle hours traveled and potential for causing socio-economic or environmental impacts, route length is a contributing factor. For example, if a corridor is 1 mile longer with an average ADT of 30,000 vehicles, it will cause 30k vehicles to travel an extra 1 mile per day, resulting in an additional \$720,000 lost in travel time costs or 1500 gallons of fuel being consumed every single day to traverse that alternative. These costs have a direct impact on the users as well as the environmental impacts.

Question 13: The second paragraph on page 58 is a discussion regarding the refinement near Governors State. Figure A-4 does not do a good job of showing the interchange spacing so understanding the constraint is difficult.

Response 13: Governors State University is located in University Park, while the university campus would be substantially impacted by the proposed corridor alternatives, this is only one factor. The placement of the alternative is determined by the constraints adjacent to the university as well as the university footprint itself. In this case when we observe the requirements to place a new freeway to freeway interchange on I-57 and minimize impacts to existing built business zones in the Village of University Park, we also are forced to move north of the east west route, this shift forces the new alternative to impact not only the proposed campus but an existing commuter station that serves the campus.

Question 14: I may just be misreading it, but the 3rd paragraph on page 69 seems to contradict itself (concerns federally listed species). The first sentence states there would be no impact on listed species. The 3rd sentence states potential impacts would be determined in Tier 2. I would like to think the second statement is correct since the amount of field work conducted at this point is limited and a final alignment is unknown.

Response 14: The 400' wide working alignments will not impact known federal T&E species, but federal T&E species may be present within the 2,000' wide alternative corridors, which will be examined more closely during the Tier Two studies.

June 14, 2012

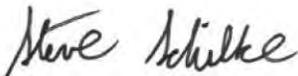
Page 5

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Response 15: You are correct. There is a reference within the 1st paragraph of Figure A-14 that should be A-13, not 3-14; thank you for pointing that out, it will be corrected.

Again, we thank you for your comments and assistance regarding The Illiana Corridor Study process and we look forward to your continued participation in our Study activities. Please contact a member of the project team if you have any further questions, comments or concerns.

Sincerely,



Steve Schilke, P.E.
Consultant Studies Unit Head
Illiana Project Manager



Greg Kicinski, P.E.
Director of Project Management
Indiana Department of Transportation

To: Ed Leonard
From: David McGibbon
CC: Ryan Pettit
Date: May 30, 2012
Re: Illiana Socioeconomic and Environmental Impact Screening Changes from ACFTM to NEPA
Informational briefing handout 5/25/12

This memo explains the changes to the Socioeconomic and Environmental Impact Screening tables presented in the Alternatives To be Carried Forward Technical Memorandum (ACFTM) and the table presented at the NEPA Merger Team Informational Meeting 5/25/12

Improved Data Quality through ongoing database management

Following the screening of alternatives that was reported in the April 25th posting of the ACFTM, the following master geodatabase items have been updated based on recently posted data sets from NWI inventory GIS downloads, Zoning Will County, Zoning Lake County, Natural Areas Illinois, Nature Preserves Illinois.

Refinements to Corridor Location

During the evaluation of the B4 and A3S2 alternatives with respect to the entire range of representative corridors, alternative C4 was revised to match the tie in location of A4 and B4. This was modified since C4 had been dismissed based on travel performance prior to the second round. The first round C4 corridor layout was re-screened based on a revised I-65 Interchange location matching A4 and B4.

Change in Impact Measurement Methodology

- **Total Wetland Impacts** - Wetland impact tables for initial rounds reported in the ACFTM were presented to exclude double counting impacts of features that had multiple classifications such as overlaps with the water body feature set. The tables for Round Two impact measures were handed out at the NEPA informational meeting on 5/25/12. These tables include all impact counts to match the methodology adopted in the DEIS where all categories of wetland are identified regardless of impact overlap with other features. In addition to the computation changes, the study area has an increase of 11% in identified wetlands since the initial data gathering stage through updates to the GIS database.
- **Total Floodplain and Stream Impacts** – Alternatives with the 1 connection point were modified to include a constrained section through the St John area that matched the manual building count impact zone. Alternatives with the 4 connection point are updated to reflect the south shift of the I-65 connection point further into the floodplain zone.
- **Total Parks and Natural Areas Impacts** – In the 5/25 NEPA handout, Parks and Natural areas were further evaluated to determine if state and local classifications of land use and characteristics were being duplicated. It was determined that the total parks and natural areas classification would be clearer if separated into sub categories. Where a state designation and local designation overlap, the double count was removed.
- **Total Trail Impacts** – This comparative screening element was evaluated in the DEIS to determine if the local jurisdictional trails were accounted for in the CMAP our County mapping layers. Where overlap occurred the screening results were adjusted to eliminate double reporting of the same asset.

- Total Farmland Impacts – Farmland impacts previously summarized all data within the USDA NASS shape file boundary for the ATCFTM. For subsequent screening runs reported in the DEIS the farm land was separated into the major categories for cropped areas, and shapes classified as developed land use were removed from the summary total.
- Total Major Utility Impacts – Additional data collection was performed to verify the major utilities in particular in the category of above ground electrical transmission lines. This information is included in the informational tables.

Overall Update Screening Impact and Recommendation:

The study team has confirmed that results from a rerun of Round Two impact tables using updated GIS data and increased category detail does not affect the recommended alternatives to be carried forward as presented in the ACFTM.

Round Two Socioeconomic and Environmental Impact Matrix with B4 and A3S2

May 24, 2012

EVALUATON CRITERIA	400' Working Alignment Corridors											
	A1	A2	A3	A3S1	A4	B1	B3	B4	A3S2	C4	Arterial A-1	Arterial B-2
Alignment Length (miles)	49.1	53.0	52.6	50.3	55.9	48.4	46.8	48.8	51.1	57.8	46.2	46.4
Wetland Impacts (acres)												
PEM	33.0	29.3	30.0	29.7	20.4	27.2	16.2	6.9	32.9	6.3	42.8	13.0
PFO	14.8	15.8	10.1	7.0	7.5	9.2	2.5	0.0	7.0	6.6	6.8	7.6
PSS	1.5	4.9	0.8	4.6	0.8	0.7	0.0	0.0	4.6	0.0	1.8	1.0
PUB	4.2	2.3	1.1	0.1	1.1	2.2	0.0	0.0	2.9	7.1	6.5	1.7
Other	10.1	10.1	10.1	10.1	10.1	3.0	3.0	3.0	10.1	10.1	0.0	12.9
Total Wetland Impacts (acres)	63.6	62.5	52.0	51.5	40.0	42.4	21.7	9.9	57.6	30.1	57.8	36.3
Total T&E Impacts (acres)	0.0	0.0	0.0	0.1	0.0	3.2	3.2	3.2	0.0	4.3	13.9	3.1
Total Floodplains Impacts (acres)	118.6	128.6	148.8	211.3	368.2	214.4	253.0	469.2	223.7	383.5	196.5	186.5
Total Stream Impacts (miles)	2.3	2.5	3.0	3.2	4.9	3.1	3.2	5.0	3.8	8.7	3.1	2.8
Total Impared Streams Impacts (miles)	2.2	2.2	2.0	2.5	2.4	1.8	2.0	2.5	2.2	3.1	2.3	1.8
Water Bodies (Rivers, Lakes, Ponds) (acres)	16.7	17.7	22.2	20.4	15.6	4.0	9.7	3.0	22.6	24.3	7.7	10.9
Parks/Nature Preserves/Natural Areas (acres)												
Total Parks Impacts (acres)	39.0	20.2	20.2	0.0	20.2	18.8	0.0	0.0	0.0	2.1	2.0	0.0
Nature Areas Impacts (Acres)	13.0	13.0	13.0	13.9	13.0	6.9	6.9	6.9	13.9	6.4	64.2	5.7
Total Forested Areas Impacts (acres)	69.6	146.5	77.8	68.6	37.0	43.2	43.3	2.5	73.7	13.2	46.8	52.1
Total Trail Impacts (miles)	3.6	3.5	3.6	0.3	3.6	0.8	0.2	0.2	0.9	5.5	2.6	0.2
Farmland (acres)												
Corn (acres)	696.5	652.2	843.3	1036.1	1035.5	752.9	940.2	1093.3	823.1	1044.7	181.0	509.5
Soy (acres)	733.9	825.4	824.7	815.7	927.6	709.0	806.7	907.5	838.3	783.9	187.4	446.8
Other (acres)	558.6	548.3	494.6	285.6	441.0	480.1	279.0	198.6	401.7	261.7	483.0	391.1
Total Farmland (acres)	1989.0	2025.9	2162.6	2137.5	2404.1	1942.1	2025.9	2199.3	2063.1	2090.3	851.3	1347.5
Special Use (acres)												
Landfill (each)	0.0	0.0	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Cemeteries (acres)	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	3.5	2.8
Business Parks (acres)	38.3	38.3	44.2	0.0	44.2	41.0	2.7	2.7	55.6	0.0	21.1	7.8
Intermodals (acres)	85.1	85.1	89.2	46.8	89.2	38.3	0.0	0.0	102.2	0.0	14.0	0.0
Major Utility - Pipelines (miles)	15.3	14.0	13.0	3.4	13.2	6.3	2.3	2.7	5.2	1.9	29.0	2.6
Major Utility - Power Lines (miles)	8.4	1.0	0.7	2.0	0.8	11.6	5.3	5.6	0.9	0.5	0.6	0.6
Affected Buildings (each)												
Residential (each)	96.0	77.0	54.0	41.0	46.0	234.0	41.0	44.0	59.0	81.0	568.0	134.0
Commerical (each)	36.0	25.0	15.0	22.0	18.0	30.0	8.0	7.0	8.0	1.0	98.0	18.0
Agricultural and Farms (each)	33.0	44.0	32.0	54.0	44.0	44.0	43.0	63.0	24.0	37.0	8.0	8.0
Unknown (each)	42.0	58.0	50.0	49.0	55.0	29.0	29.0	28.0	45.0	77.0	39.0	36.0
Total	207.0	204.0	151.0	166.0	163.0	337.0	121.0	142.0	136.0	196.0	713.0	196.0

Illiana 400 - Corridor Locational Screening	A1	A2	A3	A3S1	A4	B1	B3	B4	A3S2	C4	Arterial A1	Arterial B2
DRAFT IMPACT MATRIX	Corridor Code Illiana Length (Miles) 49.10 Facility Type Freeway Date 5/16/2012	A1 Corridor Designation Illiana Length (Miles) 53.00 Facility Type Freeway Date 5/16/2012	A2 Corridor Designation Illiana Length (Miles) 52.60 Facility Type Freeway Date 5/16/2012	A3 Corridor Designation Illiana Length (Miles) 50.30 Facility Type Freeway Date 5/16/2012	A4 Corridor Designation Illiana Length (Miles) 55.90 Facility Type Freeway Date 5/16/2012	B1 Corridor Designation Illiana Length (Miles) 48.40 Facility Type Freeway Date 5/16/2012	B3 Corridor Designation Illiana Length (Miles) 46.80 Facility Type Freeway Date 5/16/2012	B4 Corridor Designation Illiana Length (Miles) 48.80 Facility Type Freeway Date 5/16/2012	A3S2 Corridor Designation Illiana Length (Miles) 51.10 Facility Type Freeway Date 5/16/2012	C4 Corridor Designation Illiana Length (Miles) 57.80 Facility Type Freeway Date 5/16/2012	Arterial A1 Corridor Designation Illiana Length (Miles) 46.20 Facility Type Freeway Date 5/16/2012	Arterial B2 Corridor Designation Illiana Length (Miles) 46.40 Facility Type Freeway Date 5/16/2012
Infrastructure	Count	Total Area (Acres)	Count	Total Area (Acres)	Count	Total Area (Acres)	Count	Total Area (Acres)	Count	Total Area (Acres)	Count	Total Area (Acres)
South Suburban Airport (Inagural)	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
South Suburban Airport (Proposed)	1	29.87	1	29.87	2	103.38	0	0.00	2	103.38	1	3.63
Other Will County Airports	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Total Airport Infrastructure Impacts	1	29.87	1	29.87	2	103.38	0	0.00	2	103.38	1	3.63
Farmland	Count	Area (Acres)	Count	Area (Acres)	Count	Area (Acres)	Count	Area (Acres)	Count	Area (Acres)	Count	Area (Acres)
Alfalfa	17	15.53	18	17.23	15	21.02	9	9.40	18	14.51	18	5.49
Barren	10	5.86	6	2.22	8	3.33	3	0.62	11	4.07	6	4.09
Blueberries	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Cabbage	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Clover/Wildflowers	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Corn	244	696.46	223	652.17	240	843.31	134	1036.09	255	1035.53	212	752.95
Dbl. Crop Corn/Soybeans	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Dbl. Crop Soybeans/Oats	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Dbl. Crop WinWht/Corn	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Dbl. Crop WinWht/Sorghum	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Dbl. Crop WinWht/Soy	0	0.00	0	0.00	0	0.00	1	1.45	1	0.15	0	0.00
Fallow/Idle Cropland	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Grapes	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Grassland Herbaceous	356	350.70	408	290.71	332	268.32	219	144.83	325	221.56	336	313.02
Herbaceous Wetlands	1	0.15	4	0.59	1	0.15	0	0.00	1	0.15	0	0.00
Herbs	1	0.01	1	0.01	1	0.01	0	0.00	1	0.01	0	0.00
Millet	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Misc. Veggies. & Fruits	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Oats	2	2.50	2	2.50	5	3.34	0	0.00	6	3.43	3	0.87
Other Crops	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Other Hay	4	0.62	4	0.62	4	0.62	3	0.28	5	0.76	7	1.16
Pasture/Grass	14	3.51	15	3.52	21	4.65	16	2.73	17	3.80	16	2.66
Pasture/Hay	298	165.83	331	204.27	314	166.46	174	94.41	279	150.44	243	129.75
Peppers	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Pop. or Orm. Corn	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Potatoes	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Pumpkins	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Shrubland	20	4.82	25	9.37	24	4.92	10	1.83	17	3.86	20	4.29
Sod/Grass Seed	0	0.00	0	0.00	6	5.34	1	0.22	8	5.86	2	0.44
Sorghum	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Soybeans	187	733.95	172	825.38	215	824.73	133	815.74	223	927.56	152	708.99
Spring Wheat	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Squash	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Sunflower	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Sweet Corn	0	0.00	0	0.00	1	0.08	0	0.00	1	0.08	0	0.00
Switchgrass	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Watermelons	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Winter Wheat	34	9.07	35	17.31	37	16.35	14	29.87	49	32.32	26	18.36
Total Farmland Impacts	1188	1,989.02	1244	2,025.88	1224	2,162.64	717	2,137.46	1217	2,404.10	1041	1,942.06
Other Attributes	Count	Area (Acres)	Count	Area (Acres)	Count	Area (Acres)	Count	Area (Acres)	Count	Area (Acres)	Count	Area (Acres)
Developed/High Intensity	16	7.46	10	5.30	9	5.30	5	3.83	9	3.30	1	0.21
Developed/Low Intensity	166	147.77	163	106.78	147	93.82	109	80.25	142	98.50	85	64.01
Developed/Medium Intensity	64	40.78	41	26.64	34	24.07	28	15.50	33	23.57	17	6.70
Developed/Open Space	242	84.92	234	84.78	222	80.87	161	46.00	212	80.85	116	34.31
Deciduous Forest	66	152.18	87	293.89	59	165.68	44	143.36	48	82.56	45	135.99
Evergreen Forest	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Woody Wetlands	7	5.10	5	4.81	12	6.00	12	6.00	4	4.60	3	0.43
Open Water	28	21.71	22	25.96	14	13.55	5	11.12	14	13.40	20	12.26
Total Other Attribute Impacts	589	459.92	562	548.16	497	389.29	364	306.07	462	308.79	487	420.32
Land Cover	Count	Area (Acres)	Count	Area (Acres)	Count	Area (Acres)	Count	Area (Acres)	Count	Area (Acres)	Count	Area (Acres)
IL Land Cover	6	1,886.29	6	1,925.74	6	1,983.90	6	1,875.51	6	2,101.46	5	1,799.73
IN Land Cover	3	562.78	4	648.21	3	567.83	3	567.83	2	611.71	3	562.78
Total Land Cover Impacts	9	2,449.07	10	2,573.95	9	2,551.73	9	2,443.34	8	2,713.17	8	2,362.51
Parks	Count	Area (Acres)	Count	Area (Acres)	Count	Area (Acres)	Count	Area (Acres)	Count	Area (Acres)	Count	Area (Acres)
Kankakee Parks	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Will County Parks	1	20.23	1	20.23	1	20.23	0	0.00	1	20.23	0	0.00
Lake County Parks	0	18.79	0	0.00	0	0.00	0	0.00	0	18.79	0	0.00
Total Parks Impacts	1	39.02	1	20.23	1	20.23	0	0.00	1	20.23	0	0.00
Nature Areas	Count	Area (Acres)	Count	Area (Acres)	Count	Area (Acres)	Count	Area (Acres)	Count	Area (Acres)	Count	Area (Acres)
Midwin	0	0.00	0	0.00	0	0.00	0	0.00	1	0.58	1	0.58
Kankakee Conservation	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Will County Forest Preserve Dist.	1	0.95	1	0.95	1	0.95	2	1.68	1	0.93	1	0.93
High Quality Natural Communities	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Natural Areas IL	1	12.00	1	12.00	1	12.00	1	12.22	1	12.00	1	3.65
State Parks IL	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Indiana Managed Lands	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Nature Preserves	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
IDNR	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00
Total Parks Impacts	2	12.95	2	12.95	2	12.95	3	13.91	2	12.95	4	6.93

PUBH	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00					
PUBHh	1	0.03	1	0.03	1	0.03	0	0.00	1	0.03	0	0.00	0	0.00	1	1.95	0	0.00	0	0.00					
PUBHx	2	1.69	2	1.69	1	0.55	0	0.00	1	0.55	0	0.00	0	0.00	1	0.21	0	0.00	0	0.00					
PUBKFH	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00					
PUBKGH	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00					
PUBKh	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00					
PUBKHx	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00					
PUBKx	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00					
PUSAx	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00					
PUSC	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00					
PUSCh	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00					
PUSCx	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00					
PUSFx	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00					
R2AB4H	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00					
R2UBH	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	1	2.99	1	2.99	1	7.95	0	0.00	1	3.82					
R2UBHx	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00					
R2USA	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00					
R2USC	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00					
R4USF	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00					
R4USFxR	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00					
Total	62	63.64	52	62.48	49	52.03	29	51.55	43	40.01	42	42.38	18	21.72	11	9.87	37	57.59	26	30.10	58	57.85	32	36.26	
Floodplains	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	
Illinois	29	101.44	30	109.23	31	104.92	31	167.37	32	106.66	26	197.27	31	209.08	31	208.27	27	179.44	16	119.83	30	129.41	26	163.11	
Indiana	3	17.15	3	19.41	4	43.90	4	43.90	8	261.57	3	17.15	4	43.90	8	260.92	4	44.22	8	263.71	13	67.08	4	23.43	
Total	32	118.58	33	128.64	35	148.82	35	211.27	40	368.22	29	214.42	35	252.98	39	469.19	31	223.67	24	383.55	43	196.49	30	186.55	
Threatened & Endangered	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	
Illinois	0	0.00	0	0.00	0	0.00	1	0.08	0	0.00	1	3.09	2	3.17	2	3.19	0	0.00	1	4.26	0	0.00	1	3.07	
Indiana	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	44	109.24	0	0.00	
Total T&E Species	0	0.00	0	0.00	0	0.00	1	0.08	0	0.00	1	3.16	2	3.17	2	3.19	0	0.00	1	4.26	44	139.90	1	3.07	
Water Bodies (Rivers, Lakes, Ponds)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	
	12	16.66	14	17.75	10	22.22	5	20.43	9	15.56	7	4.03	5	9.66	3	2.97	10	22.65	42	24.27	13	7.71	7	10.86	
Land Parcels	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	
Forest Preserve Dist Will Co	12	86.81	12	86.81	11	86.57	0	2.10	11	86.57	5	7.50	2	2.90	2	2.90	1	5.44	1	2.11	30	106.64	3	5.00	
Lake Co Parcels	396	543.94	168	644.23	109	566.21	109	566.21	79	608.39	396	543.94	109	566.21	77	610.40	110	568.51	79	596.36	631	493.19	301	532.22	
Will Co Parcels	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	0	0.00	
Kankakee Parcels	0	0.00	0	0.00	0	0.00	0	0.00	4	66.70	0	0.00	0	0.00	11	81.95	0	0.00	280	1,418.74	0	0.00	0	0.00	
Total	408	630.75	180	731.04	120	652.78	109	568.31	94	761.66	401	551.45	111	569.11	90	695.24	111	573.95	360	2017.21	661	599.83	304	537.22	
Special Waste	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	
Impaired Lakes	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Impaired Water Ways																									
Streams P1 303d	1	1	1	1	1	1	0	0	1	1	0	0	0	0	0	0	0	0	1	2	0	0	0	0	
Streams P2 303d	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Streams P3 305b	1	1	1	1	1	1	0	0	1	1	0	0	0	0	0	0	0	0	1	2	0	0	2	2	
Landfills - Beecher	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Other	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	
Cemeteries	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3	3,468,306.56	1	2,783,817,997	
Federal Dept of Defense	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Golf Courses	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	3	23,076,790.83	0	0	
ARP (NOT SCREENED - LINE HOLDER)																									
Affected Buildings/Property (Surmised)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	Count	Area (acres)	
Business Parks Will	1	38.27	1	38.27	1	44.19	0	0.00	1	44.19	2	40.95	1	2.68	1	2.68	1	55.58	0	0.00	3	21.11	1	7.77	
Buildings K3	0	0.000	0	0.000	0	0.000	0	0.000	4	0.024	0	0.000	0	0.000	1	0.003	0	0.000	185	5.193	0	0.000	0	0.000	
Intermodals	2	85.06	2	85.06	3	89.19	1	46.78	3	89.19	1	38.28	0	0.00	0	0.00	3	102.21	0	0.00	1	14.03	0	0.00	
Illiana Corridor Locational Screening	A1	A2	A3	A3S1	A4	B1	B3	B4	A3S2	C4	Arterial A1	Arterial B2													
DRAFT MATRIX	Corridor Code	Corridor Designation	Length (Miles)	Facility Type	Date	Corridor Code	Corridor Designation	Length (Miles)	Facility Type	Date	Corridor Code	Corridor Designation	Length (Miles)	Facility Type	Date	Corridor Code	Corridor Designation	Length (Miles)	Facility Type	Date	Corridor Code	Corridor Designation	Length (Miles)	Facility Type	Date
	A1	A2	A3	A3S1	A4	B1	B3	B4	A3S2	C4	Arterial A1	Arterial B2													
	Illiana	Illiana	Illiana	Illiana	Illiana	Illiana	Illiana	Illiana	Illiana	Illiana	Illiana	Illiana	Illiana	Illiana	Illiana	Illiana	Illiana	Illiana	Illiana	Illiana	Illiana	Illiana	Illiana	Illiana	
	Freeway	Freeway	Freeway	Freeway	Freeway	Freeway	Freeway	Freeway	Freeway	Freeway	Freeway	Freeway	Freeway	Freeway	Freeway	Freeway	Freeway	Freeway	Freeway	Freeway	Freeway	Freeway	Freeway	Freeway	
	5/16/2012	5/16/2012	5/16/2012	5/16/2012	5/16/2012	5/16/2012	5/16/2012	5/16/2012	5/16/2012	5/16/2012	5/16/2012	5/16/2012	5/16/2012	5/16/2012	5/16/2012	5/16/2012	5/16/2012	5/16/2012	5/16/2012	5/16/2012	5/16/2012	5/16/2012	5/16/2012	5/16/2012	
Infrastructure	Count	Length (miles)	Count	Length (miles)	Count	Length (miles)	Count	Length (miles)	Count	Length (miles)	Count	Length (miles)	Count	Length (miles)	Count	Length (miles)	Count	Length (miles)	Count	Length (miles)	Count	Length (miles)	Count	Length (miles)	
Trails																									
IL Trails	20	3,569																							

Other		17	0.722	7	0.568	11	0.831	11	0.831	8	0.630	17	0.722	11	0.831	8	0.632	11	0.832	8	0.629	53	2.580	30	3.435	
Total Indiana Roads Impacts		36	1.884	19	1.561	18	1.283	18	1.283	15	1.193	36	1.884	18	1.283	15	1.194	18	1.291	15	1.191	142	12.596	60	9.135	
Illinois Roads																										
Interstate		4	0.238	4	0.238	4	0.238	4	0.240	4	0.238	2	0.165	2	0.159	2	0.159	4	0.247	3	0.170	5	0.246	8	0.341	
Other Principal Arterial		9	0.468	9	0.468	6	0.430	7	0.913	6	0.430	11	0.868	6	0.861	6	0.861	8	0.658	3	0.152	73	21.921	34	18.001	
Minor Arterial (Non-Urban)		0	0.000	0	0.000	0	0.000	1	0.082	0	0.000	0	0.000	1	0.082	0	0.000	0	0.000	2	0.152	0	0.000	2	0.102	
Minor Arterial (Urban)		11	1.013	9	0.851	8	0.668	2	0.124	8	0.668	4	0.426	0	0.000	0	0.000	3	0.184	0	0.000	26	7.611	1	0.013	
Major Collector (Non-Urban)		0	0.000	0	0.000	1	0.114	0	0.000	1	0.114	1	0.089	2	0.078	2	0.078	1	0.114	14	3.639	0	0.000	2	0.071	
Minor Collector (Non-Urban)		1	0.110	1	0.125	1	0.101	1	0.076	1	0.101	1	0.110	1	0.076	1	0.088	1	0.101	9	1.688	1	0.077	3	0.077	
Collector (Urban)		8	1.183	8	1.183	5	0.243	0	0.000	5	0.243	6	1.093	3	0.153	3	0.153	0	0.000	1	0.038	4	0.216	5	0.876	
Local Road or Street (Urban)		41	3.815	40	3.816	40	3.788	26	2.284	40	3.788	37	2.673	17	1.224	17	1.224	41	3.650	3	1.055	50	2.116	29	2.877	
Local Road or Street (Non-Urban)		0	0.000	0	0.000	5	0.392	19	1.519	8	0.681	9	0.697	17	1.322	20	1.752	11	0.798	67	18.956	0	0.000	51	13.947	
Total Illinois Roads Impacts		74	6.827	71	6.681	70	5.975	60	5.238	73	6.263	71	6.121	49	3.956	52	4.399	69	5.751	102	25.849	159	32.187	135	36.304	
Total Road Impacts		110	8.711	90	8.243	88	7.258	78	6.521	88	7.456	107	8.004	67	5.239	67	5.593	87	7.042	117	27.040	301	44.783	195	45.439	
Utilities																										
Pipelines																										
Pipeline WillCo Lake Co		11	15.261	6	14.045	2	13.004	2	3.397	3	13.230	11	6.298	2	2.301	3	2.154	2	5.212	2	0.789	6	28.981	2	2.629	
Pipelines Kankakee		0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	3	0.538	0	0.000	13	1.077	0	0.000	0	0.000	0	0.000	
Power Lines		8	8.377	8	1.020	7	0.721	11	2.032	8	0.799	9	11.619	10	5.266	11	5.572	9	0.880	6	0.505	6	0.598	7	0.599	
Total Utility Impacts		19	23.639	14	15.065	9	13.725	13	5.430	11	14.030	20	17.917	12	7.567	17	8.264	11	6.092	21	2.372	12	29.579	9	3.229	
Railroads Crossings																										
Commuter Rail																										
Metra (midewin)		0	0.000	0	0.000	0	0.000	1	0.077	0	0.000	0	0.000	0	0.000	0	0.000	1	0.077	0	0.000	0	0.000	0	0.000	
Metra (Minooka)		0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	
Metra (Peotone)		1	0.209	1	0.209	1	0.209	0	0.000	1	0.209	1	0.089	0	0.000	0	0.000	1	0.082	0	0.000	1	0.076	0	0.000	
Metra SES		1	0.086	1	0.086	0	0.000	0	0.000	0	0.000	1	0.086	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	1	0.076	
Metra Network		1	0.076	1	0.076	1	0.076	0	0.000	1	0.076	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	1	0.080	0	0.000	
Total Commuter Rail Impacts		3	0.370	3	0.370	2	0.284	1	0.077	2	0.284	2	0.175	0	0.000	0	0.000	2	0.159	0	0.000	3	0.232	0	0.000	
Freight Rail																										
Rail K3		2	0.288	2	0.288	2	0.314	2	0.158	2	0.314	2	0.174	2	0.158	2	0.158	2	0.201	2	0.153	2	0.152	2	0.158	
IN Rail		2	0.153	2	0.158	2	0.155	2	0.155	2	0.188	2	0.153	2	0.155	2	0.188	2	0.155	2	0.188	2	0.160	2	0.158	
Will Co Rail		19	2.058	19	2.058	19	2.114	16	1.500	19	2.114	4	0.338	5	0.393	5	0.393	15	1.511	0	0.107	10	0.662	8	0.508	
Total Freight Rail Impacts		23	2.500	23	2.504	23	2.583	20	1.813	23	2.616	8	0.665	9	0.706	9	0.738	19	1.867	4	0.448	14	0.974	12	0.824	
Total Rail Impacts		26	2.870	26	2.875	25	2.868	21	1.890	25	2.900	10	0.839	9	0.706	9	0.738	21	2.026	4	0.448	17	1.207	12	0.824	
Hydrological																										
Streams																										
Will Co Streams		16	1.618	18	1.861	19	1.956	20	2.219	19	1.956	17	2.364	19	2.142	19	2.108	21	2.776	14	1.330	23	2.293	21	1.694	
K3 Streams		0	0.000	0	0.000	0	0.000	0	0.000	1	0.090	0	0.000	0	0.000	0	0.000	0	0.000	36	4.734	0	0.000	0	0.000	
IN Streams		8	0.686	7	0.631	13	1.012	13	1.012	30	2.804	8	0.686	13	1.012	32	2.877	15	1.034	29	2.661	10	0.839	14	1.087	
Total Stream Impacts		24	2.304	25	2.492	32	2.968	33	3.232	50	4.850	25	3.050	32	3.154	51	4.986	36	3.809	79	8.725	33	3.132	35	2.781	
Impared Streams																										
303L1		9	0.777	8	0.745	6	0.513	4	0.383	7	0.620	6	0.528	3	0.264	5	0.365	5	0.412	7	0.573	4	0.361	5	0.364	
303L2		0	0.000	0	0.000	1	0.080	1	0.080	2	0.188	0	0.000	1	0.080	2	0.188	1	0.080	2	0.188	0	0.000	0	0.000	
305BL3		17	1.457	16	1.446	17	1.441	21	1.988	19	1.582	14	1.257	17	1.672	22	1.995	18	1.692	24	2.348	17	1.974	21	1.404	
Total Impared Streams Impacts		26	2.234	24	2.191	24	2.034	26	2.451	28	2.390	20	1.785	21	2.016	29	2.548	24	2.183	33	3.109	21	2.335	26	1.768	
Total Hydrological Impacts		50	4.538	49	4.684	56	5.002	59	5.683	78	7.240	45	4.835	53	5.170	80	7.534	60	5.993	112	11.834	54	5.467	61	4.549	
IDNR Biologic Survey Rating Streams																										
2+ highest classes		0	0.000	0	0.000	0	0.000	1	0.171	0	0.000	0	0.000	0	0.000	1	0.171	0	0.000	1	0.079	0	0.000	0	0.000	
Diversity A		0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	1	0.076	0	0.000	0	0.000	
Diversity A, 2+ highest classes		0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	1	0.080	0	0.000	0	0.000	
Total Biologic Survey Rated Streams		0	0.000	0	0.000	0	0.000	1	0.171	0	0.000	0	0.000	0	0.000	1	0.171	0	0.000	3	0.235	0	0.000	0	0.000	
IDNR Biologic Survey Stream Integrity																										
A		0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	
B		0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	2	0.171	0	0.000	2	0.172	0	0.000	2	0.156	0	0.000	2	0.203	
C		4	0.323	4	0.323	4	0.292	6	0.591	4	0.292	2	0.198	0	0.000	4	0.507	3	0.264	4	0.421	2	0.191	3	0.264	
D		0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	
E		1	0.079	1	0.079	1	0.079	0	0.000	1	0.079	0	0.000	0	0.000	0	0.000	0	0.000	0	0.000	1	0.123	0	0.	

Illiana Corridor Locational Screening		A1	A2	A3	A3S1	A4	B1	B3	B4	A3S2	C4	Arterial A1	Arterial B2
DRAFT MATRIX	IMPACT	Corridor Code A1 Illiana Freeway	Corridor Code A2 Illiana Freeway	Corridor Code A3 Illiana Freeway	Corridor Code A3S1 Illiana Freeway	Corridor Code A4 Illiana Freeway	Corridor Code B1 Illiana Freeway	Corridor Code B3 Illiana Freeway	Corridor Code B4 Illiana Freeway	Corridor Code A3S2 Illiana Freeway	Corridor Code C4 Illiana Freeway	Corridor Code Arterial A1 Illiana Freeway	Corridor Code Arterial B2 Illiana Freeway
		Corridor Designation Length (Miles) Facility Type Date											
		Count Length (miles)											
Affected Buildings (each)													
Residential (each)		96	77	54	41	46	234	41	44	59	81	568	134
Commerical (each)		36	25	15	22	18	30	8	7	8	1	98	18
Agricultural and Farms (each)		33	44	32	54	44	44	43	63	24	37	8	8
Unknown (each)		42	58	50	49	55	29	29	28	45	77	39	36
Total		207	204	151	166	163	337	121	142	136	196	713	196
Landfills		0	0	1	0	0	0	0	0	0	0	0	0

To: Lyne, Jamy L.
Subject: RE: Illiana Corridor Response Letter 16878 9.8.4.4

From: Buffington, Matt [<mailto:MBuffington@dnr.IN.gov>]
Sent: Tuesday, June 19, 2012 12:06 PM
To: Powell, William (Rick)
Cc: Rampone, Richard A.; Lyne, Jamy L.; Hilden, Laura; 16878A Illiana Expressway Tier 1 Study Project Email; Garman, Hala; Kicinski, Greg; Susinskas, Kesti P.; Schilke, Steven E; Leonard, Edward; Ott, Steven
Subject: RE: Illiana Corridor Response Letter 16878 9.8.4.4

Rick,
I've read through the response and while I don't agree with everything, I can move forward. However, one question was not addressed. Question 15 only had a response regarding the correct figure citation. The corridor maps between Figure A-14 and A-13 don't seem to line up (please see my original email comments for better details). Hopefully such inconsistencies will be cleaned up in the DEIS since a variation of the corridor by a 100' or so can mean hitting or avoiding a resource.

Matt Buffington
Environmental Supervisor
Division of Fish and Wildlife
IN Department of Natural Resources
402 W. Washington St., Room W273
Indianapolis, IN 46204

Phone: 317-233-4666
Fax: 317-232-8150
Email: mbuffington@dnr.in.gov
www.in.gov/dnr/fishwild/

From: Powell, William (Rick) [<mailto:PowellW@pbworld.com>]
Sent: Thursday, June 14, 2012 5:07 PM
To: Buffington, Matt
Cc: Rampone, Richard A.; Lyne, Jamy L.; Hilden, Laura; 16878A Illiana Expressway Tier 1 Study Project Email; Garman, Hala; Kicinski, Greg; Susinskas, Kesti P.; Schilke, Steven E; Leonard, Edward; Ott, Steven
Subject: Illiana Corridor Response Letter 16878 9.8.4.4
Importance: High

Mr. Buffington:

Enclosed is an electronic copy of the response letter (with attachments) regarding your email of June 5, 2012 to Rick Rampone. A hard copy will follow.

Please contact me or Mr. Rampone at our Indianapolis office at 317-972-1706 if you have any questions.

Thanks,

Rick Powell, P.E.

Senior Engineering Manager

Parsons Brinckerhoff

230 West Monroe Street

Suite 900

Chicago, IL 60606

Mobile: 312-330-7477

powellw@pbworld.com

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MEMORANDUM

To: Steven Schilke
From: Rick Powell
File: 16878A 8.10.4.1
Date: June 13, 2012
Re: Response to Resource Agency comments

Following is a listing of comments and proposed responses to federal resource agency comments and questions from the May 25, 2012 informational meeting in Chicago and USEPA and USACE emailed comments on Purpose and Need of June 2012.

May 25, 2012 NEPA/404 Informational Meeting

Comment: (USACE) Are wetland impacts tabulated for 400' or 2000'?
Response: 400'

Comment: (FWS-IL) What database was used to identify wetlands?
Response: NWI revision April 2012

Comment: (USACE) There is concern about bias against arterials as alternatives. For example, increased truck traffic on arterials is shown as a negative measure; introduction of a new arterial as an alternative would increase it.
Response: Reducing truck traffic on arterials was a stakeholder driven issue. Many stakeholders in the Study area would like to see reduced truck traffic on arterials in their community.

Comment: (FWS-IN) How does study know where the traffic "wants to go"?
Response: Information such as the FAF database and CMAP Travel Tracker surveys was used.

Comment: (USEPA) Are job accessibilities measured at one point or throughout the Study Area?
Response: Throughout

Comment: (USACE) What fraction of improvement does project show for Region improvement, and what should be the threshold of success?
Response: Any one project, even large scale ones such as Illiana, will not show a large improvement compared to the Region baseline. Success of measures is traditionally viewed in a project-specific way and in consideration of what is reasonably achievable. Monetary measures such as cost vs. benefits or the value of travel time savings over a period of time can be used to measure net positive benefits of alternatives.

Comment: (USACE) What other evaluation measures could be used other than what we have seen?

Response: See the fourth "Individual" USACE comment on P&N below. Most of the "traditional" measures in similar studies are being used in ACFTM or were used previously in the TSP Report. VMT, VHT, Congested VMT, LOS, v/c ratios, travel times, average speeds, job accessibility, and variations with/without trucks, or within various parts of the Study Area or Region, are all potential measures. The measures used in the ACFTM included variations involving Region East-West VHT, Region VHT, Job Accessibility within 30 Minutes, Study Area Congested VMT on Arterials, ADT (truck and all vehicles), daily Hours of Travel on study Area arterials, Truck Miles of Travel on Arterials, and Region truck Hours of Travel. New lane miles were tabulated but not used in the evaluation for travel benefits.

Comment: (FWS - IN) what routes would trucks take to detour from I-80 and how far out of their way is practical?

Response: It depends on the individual trip. The travel model calculates the best travel time per trip and routes them accordingly, with tolling, mode, and other user factors considered.

Comment: (USEPA) How is the base population/employment incorporated in model?

Response: 1st and 2nd round travel evaluations used a 2040 "no build" market driven approach, in the comparison of the 3 proposed build alternatives, a "build" market driven approach was used that redistributed jobs and people due to the facility being in place.

Comment: (USEPA) How are you treating the mitigation area at Joliet Army Training Area?

Response: Direct impact is avoided by staying out of JATA. We are also looking at avoidance options at Treat Island just to the north, in case it is ruled a 4(f) resource.

Comment: (USEPA) How are you treating historic US 66 impacts?

Response: 3 scenarios are proposed – 1.) no interchange (avoiding direct impact) via overpass over IL 53; 2.) interchange directly on IL 53; and 3.) interchange offset to the east of IL 53. These scenarios will be applied to all 3 build alternatives. Study will gather public comment before deciding which to carry forward into FEIS.

Comment: (USACE) Is a new tolled facility warranted if only 25% of non-tolled traffic is retained?

Response: No final determination on tolling is anticipated until Tier 2. Tolling rate setting and usage is a complex issue. Travel performance studies show improvements over the "no build" scenario even at 25% retention, and better performance in general than the introduction of a non-tolled arterial.

Comment: (FHWA) Why are resources impacts different between those shown in the ACFTM and the handout today?

Response: A memorandum of June 13, 2012 was prepared to show the reason for the differences. Primary differences were due to the footprint of alternatives in the handout expanded to show representative interchange locations; updates of the GIS databases used to tabulate impacts; and change in count method (some resources were tabulated in multiple categories) from ACFTM to the handout.

Comment: (FWS-IN) Are contractors (surveyors & others) already in the corridor?

Response: The study team is currently compiling methodology for Advanced Field Data collection that will commence later this year. Survey/Right of Entry letters were sent to the three corridors being advanced forward.

Comment: (All) What is level of community acceptance of A3S2?

Response: Support for A3S2 came mainly from communities not directly impacted or organizations like Openlands, Midewin Alliance, and SSMMA. The village of Crete favors A3S2. The town of Merrillville previously favored A1. Otherwise, there is moderate to strong opposition to A3S2 by directly affected communities.

Comment: (USEPA) There is a great deal of information collected, but the study needs to present it in a more understandable manner.

Response: In response to this request, the presentation of CPG #8 was structured to achieve a more orderly presentation. Future reports and presentations will also reflect this effort.

Comment: (FHWA) A straight line of progression is needed to be shown to show decision making, and how the conclusions of the DEIS were reached. Structure results showing travel performance plus impact considerations indicates the overall performance of the alternatives.

Response: Agreed to take comments into consideration to prepare DEIS and future presentations.

Comment: (All) A shorter summary of the alternatives process is needed.

Response: A summary was prepared.

Comment: (All) When will the DEIS be available?

Response: the Notice of Availability is scheduled for mid-July 2012.

Comment: (IN DNR) Define "adverse travel".

Response: Travel that takes a traveler out of the direction they want to go; "backtracking" or sideways travel not getting the traveler closer to their destination.

Comment: (IDEM) request to follow field survey protocols and appropriate time windows for resource information gathering.

Response: Agreed.

Comment: (IN DNR -SHPO) ACFTM Comments were submitted as a follow up - 6 comment items were included.

Response: A response was prepared June 13, 2012.

June 2012 individual Resource Agency P&N comments

Comment: (USEPA) P&N needs to directly address relieving I-80 congestion - 3 potential approaches offered, each defining the need for an "alternative" to I-80 for regional east west travel around the southern tip of Lake Michigan.

Response: P&N revision was prepared that specifically mentions east-west travel needs and points to I-80 and US 30 as the only available corridors despite needs for additional east-west travel within the Study Area.

Comment: (USEPA) Local connectivity is needed for Will, Lake, and Kankakee counties while retaining connectivity of green resources.

Response: Local connectivity needs are addressed in P&N. Green connectivity is not a transportation need but could be addressed with more details in Tier 2; the corridor will be developed in a way that protects resources.

Comment: (USEPA) Provide a sustainable east west path that provides for future expandability.

Response: A 400' vs. 600' corridor impact analysis was prepared. Some corridors fare better than others. Expandability was addressed in the ACFTM as a desired characteristic, and 2 of the 3 proposed "build" alternatives are easily expandable, and the third (A3S2) is easily expandable in some locations but not others.

Comment: (USEPA) Provide a transportation buffer separating growth from agribusiness

Response: The study cannot find support or justification for using a transportation facility to serve as an urban barrier. There are potential conflicts with the connectivity goal mentioned earlier.

Comment: (USEPA) Provide for a shifting freight logistics market in the 3 county area

Response: Purpose and Need addresses this in providing efficient movement of freight; it also acknowledges the intermodal and logistics component of freight traffic generation.

Comment: (USACE) Study P&N points should be: provide east-west connectivity throughout the study area, improve mobility of freight in the study area, and improve the mobility of cars throughout the study area.

Response: East-west connectivity was added to the introduction of P&N. Mobility of freight is addressed by P&N.

Comment: (USACE) Addressing local deficiencies, reducing truck traffic on arterials, improved job access, and better direct truck connectivity with intermodal facilities should be secondary P&N points, if at all.

*to support
Projected pop
emp. econ dev, trans*

Response: Local deficiencies are noted by many stakeholders, especially toward the southern part of the Study Area where few east-west options exist and truck traffic is seen as a problem on the local network. Improved job access and reducing VMT or VHT on arterials are measures, not needs, that can be applied as needed.

Comment: (USACE) The primary purpose of the project is to create an east-west expressway to meet the stated needs above. This will help frame the project and better establish measures of success.

Response: Explicitly stating the solution to this detail in the P&N is not in the spirit of CSS or stakeholder involvement. For example, many stakeholders were and are interested in rail freight as a solution or component, and our broad P&N allowed us to look at it to see if it made sense. We understand the range of viable solutions now that we have generated and tested many potential solutions

Comment: (USACE) Criteria need to be examined to see if they are the best measures for success of the alternatives. Having a more direct P&N would make it easier to select the right measures.

Response: This comment goes more to Alternatives to be Carried Forward than P&N. We can look at different measures and see how they would affect the selection if different need points were being considered. Some measures that could have been used but were not were: point-to-point travel times, level of Service (LOS), volume/capacity ratios, vehicle delay, or safety (comparative crash rates, etc.). Reduction of VHT captures some of what would have been captured if delay or v/c measures were used (they correlate fairly closely). Safety was not found to be an explicit project need and therefore safety measures were not used. Point to point travel times are similar to VHT in that both show the gain or reduction in travel time when an alternative is reduced, although VHT captures more movements than an isolated point-to-point time study.

Comment: (USACE) A clear, step-by-step process for evaluating and eliminating alternatives is also needed

Response: Travel performance, environmental impacts and stakeholder involvement were logically examined and alternatives with poor performance, higher impacts, or less acceptable to stakeholders were more likely to be set aside. Alternatives that showed promise in performance but were higher impacting were improved to attempt to make them more acceptable and then subjected to the same process.

Comment: (USACE) Measures of success must be defined (a threshold?).

Response: See the sixth comment (USACE).

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June 14, 2012

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201 West Center Court
Schaumburg, Illinois 60196

BUREAU OF PROGRAMMING
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JUN 18 2012

DISTRICT #1

Greg Kicinski, P.E.
Director of Project Management
Indiana Department of Transportation
100 North Senate Avenue, Room N642
Indianapolis, Indiana 46204

Federal Agency: Federal Highway Administration ("FHWA")

Re: Request for concurrence on the April 25, 2012 draft "Alternatives to be Carried Forward Technical Memorandum, Illiana Corridor Tier 1 Environmental Impact Statement" ("ACFTM"; HPER-IL; INDOT Des. No. 1006456; DHPA No. 11913)

Dear Mr. Schilke and Mr. Kicinski:

Pursuant to the National Environmental Policy Act and Section 6002 of the Safe, Accountable, Flexible, and Efficient Transportation Equity Act, the staff of the Indiana State Historic Preservation Officer ("Indiana SHPO") has reviewed the aforementioned document pertaining to the Illiana Corridor, which would be located in Lake County, Indiana and in Will County or Kankakee County, Illinois. Our focus in commenting on the ACFTM is limited to cultural resources.

The historical or archaeological consultants who conducted the research underlying Table 3-8 (page 67 of the ACFTM) and Table 4-5 (page 79) no doubt discovered that not all of the inventories of cultural resources available for Lake County (page 19) are up to date. The *Lake County Interim Report: Indiana Historic Sites and Structures Inventory*, for example, was published in 1996 based on data gathered during the two years preceding the publication, and it includes properties that were at least 40 years old at the time of the survey. Furthermore, in contrast to the Indiana Department of Transportation's more recent *Indiana Historic Bridges Inventory*—the conclusions of which have been accepted by FHWA, INDOT, and the Indiana SHPO as valid for highway projects in Indiana for the next several years—the evaluations in the *Lake County Interim Report* reflect the surveyors' opinions of the relative significance of the properties identified, except for properties that had been listed in the National Register of Historic Places by 1996.

As we previously have advised with respect to archaeology, please be aware that not all of the currently recorded archaeological sites in Lake County, Indiana have been entered into the Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology ("DHPA") electronic SHAARD database (cited on page 19 of the ACFTM). Other documents in the DHPA office that may contain archaeological site locations that may not be entered yet into a GIS system include topographic maps, archaeological reports, archaeological site forms, etc.

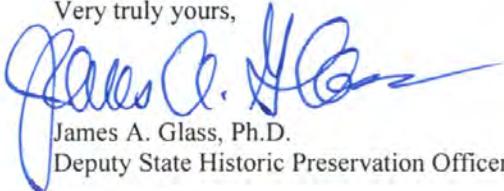
As we also have commented previously, we have observed while reviewing other environmental impact statements on large projects that resources of certain kinds and the impacts on those resources tend to be tallied and that the tallies are then used to compare the alternatives being studied. A similar comparison has been made in Table 4-5. We would ask that you keep in mind that not all archaeological or historical resources are of the same quality or significance and that, consequently, a purely numerical comparison does not necessarily provide an accurate assessment of the impact on archaeological or historical resources that a given alternative will have.

Steve Schilke, P.E.
Greg Kicinski, P.E.
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With those factors in mind, we concur with the conclusion stated on page 80 of the ACFTM that "Alternatives B3, B4, and A3S2 . . . should be carried forward along with the No-Build alternative for detailed evaluation in the Tier 1 DEIS."

If you have questions about historic preservation issues related to buildings or structures in Indiana, please contact John Carr at (317) 233-1949 or jcarr@dnr.in.gov. Questions about archaeological issues in Indiana should be directed to Dr. Rick Jones at (317) 233-0953 or rjones@dnr.in.gov.

Very truly yours,



James A. Glass, Ph.D.
Deputy State Historic Preservation Officer

JAG:JRJ:JLC:jlc

- emc: Steven Schilke, Illiana Project Manager
Greg Kicinski, Indiana Department of Transportation
Diane O'Keefe, P.E., Illinois Department of Transportation
Kesti Susinskas, P.E., Illinois Department of Transportation PMC Project Manager
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Matt Buffington, Division of Fish and Wildlife, Indiana Department of Natural Resources
Richard Rampone, P.E., Parsons Brinckerhoff

DNR

Indiana Department of Natural Resources

Environmental Unit
402 W. Washington Street, Rm. W273
Indianapolis, IN 46204-2781

June 22, 2012

Matt Fuller
Environmental Programs Engineer
Federal Highway Administration – Illinois Division Office
3250 Executive Park Drive
Springfield, IL 62563

**Re: DNR #16383: Illiana Corridor, Tier 1 EIS: Draft Alternatives to be Carried Forward
Technical Memorandum; Lake County**

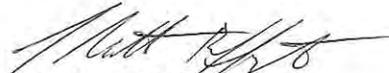
Dear Mr. Fuller:

The Indiana Department of Natural Resources (DNR) has reviewed the above referenced document, dated as “Draft April 25, 2012”, which was received in our office on May 18, 2012. The DNR, Division of Fish and Wildlife, concurs with this document and the forwarding of alternatives B3, B4, and A3S2 for detailed evaluation under the Tier 1 Draft EIS.

The evaluation of alternatives resulted in a selection of alternatives that attempted to avoid the more obvious environmental resources through the entire study area while still providing a route that met the transportation purpose and need criteria. As this project progresses, more detailed information will be needed to better determine impacts upon resources. For instance, wetland delineations and identification of land uses within floodplains will identify whether or not impacts will occur to natural areas or constructed waterbodies and agricultural areas.

Our agency appreciates this opportunity to be of service. Please do not hesitate to contact Christie Stanifer, Environmental Coordinator, at (317) 232-8163 or estanifer@dnr.in.gov if we can be of further assistance.

Sincerely,



J. Matthew Buffington
Environmental Supervisor
Division of Fish and Wildlife

cc:
Greg Kicinski, Indiana Department of Transportation
Steven Schilke, Illinois Department of Transportation

PS2 # 763

From: Schilke, Steven E [\[mailto:Steven.Schilke@illinois.gov\]](mailto:Steven.Schilke@illinois.gov)
Sent: Wednesday, June 27, 2012 9:22 PM
To: Lyne, Jamy L.; Leonard, Edward; Powell, William (Rick)
Cc: Susinskas, Kesti P.
Subject: Fw: Illiana Corridor Concurrence for Alternatives to be Carried Forward

From: CLARK METTLER, MARTHA [\[mailto:MCLARK@idem.IN.gov\]](mailto:MCLARK@idem.IN.gov)
Sent: Friday, June 22, 2012 10:42 AM
To: Fuller, Matt
Cc: Schilke, Steven E; Kicinski, Greg <GKICINSKI@indot.IN.gov>; Hilden, Laura <lhilden@indot.IN.gov>; RANDOLPH, JASON <JRANDOLP@idem.IN.gov>
Subject: Illiana Corridor Concurrence for Alternatives to be Carried Forward

Mr. Fuller:

After review of the Technical Memorandum for the Illiana Corridor “Alternatives to be Carried Forward” dated April 25, 2012, and information presented in coordination meetings dated May 25, 2012 and June 15, 2012, the Indiana Department of Environmental Management concurs with the alternatives to be carried forward for further analysis.

If you have any questions about this email, please contact Jason Randolph, Project Manager, of my staff at 317-233-0467 or by email at jrandolp@idem.in.gov.

Martha Clark Mettler
Deputy Assistant Commissioner
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Indiana Department of Environmental Management
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