January 7, 2007

Diane O'Keefe, PE
Deputy Director, Regional Engineer
Illinois Department of Transportation
700 East Norris Drive
P.O. Box 697
Ottawa, IL 61350

RE: Prairie Parkway Draft Environmental Impact Statement

Dear Deputy Director O'Keefe,

I am writing you as a professional planner, biologist and concerned citizen regarding the proposed Prairie Parkway. Based upon my review of the draft environmental impact statement (DEIS), **I am strongly opposed to the construction of either of the two build options "B2" and "B5".** The document is written as though the construction of the Prairie Parkway is a foregone conclusion. This DEIS is a marketing plan to build a road, not a comprehensive assessment of all available options with the goal of minimizing the adverse environmental impacts associated with the construction of new roads. Rather than give the "no build" option equal billing with the two Prairie Parkway build options, the no build option is presented as if it were a mere obligation to be mentioned rather than a serious alternative to construction of this new superhighway.

I support an approach based on growth management, full utilization of the vast potential for mass transit that has been identified by the Northeastern Illinois Planning Commission (now the Chicago Metropolitan Agency for Planning), and using available funding for making all feasible upgrades to existing roads. The construction of the Prairie Parkway would continue the piecemeal development of the Chicago region, whereby the goal is to anticipate where development may occur, rather than try to plan where that development should occur. Once built, the Parkway will become a self-fulfilling prophecy by inducing more and more dependence on the automobile, which will in turn cause more traffic congestion as more people are forced to drive long distances to their places of work and shopping. This long-run effect of inducing more reliance on the automobile is not specifically addressed in the DEIS.

Specific comments on the DEIS follow.

1. At various places in the DEIS the comment is made that the added air and water pollution resulting from construction of the Parkway will not lead to a violation of air or water quality standards (e.g. pages xiv, xvi, 4-24, and 4-59). This does not equate with zero impacts; there will still be adverse impacts on water quality. This is my problem with the way the DEIS is written: every adverse impact is written off as inconsequential, or a plan to reduce the impact is proposed, and the impact is then

dropped from further consideration. But the cumulative impact of all such adverse impacts is appreciable, especially when one considers the induced impacts resulting from increased driving, as alluded to above. Federal regulations (40 CFR 1508.7) require the consideration of cumulative impacts.

2. On page xvii of the Executive Summary, the authors of the DEIS acknowledge that the detailed build alternatives will likely induce an indirect effect of development "in a more scattered and less compact pattern", and that this induced pattern of low-density growth may occur in areas not planned for development in area land use plans. This is a significant acknowledgement of the "sprawl" effect of the build alternatives, but the long-run impact of this induced growth is not explicitly incorporated into the DEIS.

3. Several unresolved air pollution concerns are raised in the DEIS for the B2 and B5 build alternatives. First, the DEIS states that a portion of the Prairie Parkway study area is in a moderate non-attainment area for National Ambient Air Quality Standard for ozone (p. 2-43). The related discussion in Chapter 2 does not indicate how either build alternative will affect the region's ability to attain this air quality standard by 2010, as required. Second, the DEIS authors acknowledge on page 4-30 that the effects of mobile source air toxic (MSAT) emission impacts on human health cannot be made at the project level, but that increased MSAT exposure is may result from the construction of the Prairie Parkway.

4. The DEIS documents the existence of several significant natural areas in the project area, particularly those associated with the Fox River, Big Rock Creek, and Aux Sable Creek. Identified impacts in and around these areas include, but are not limited to, the loss of 54 to 58 acres of forest, increased fragmentation of forest and other habitats along with the associated loss of wildlife corridors, a flush of turbidity and sedimentation to these waterways resulting from road construction which will damage the sensitive aquatic communities of these waterbodies (which include several endangered species), a reduction in groundwater recharge to sensitive seep areas on the south bank of the Fox River, increased salt runoff, splash and spray, loss of floodplain storage, and direct impacts to 14 wetlands with a loss of 2.64 to 2.71 acres. Given the extensive loss of natural habitat in the project area, these few remaining natural areas are vital remnants of these now rare ecosystems, and they provide the only remaining habitat in the region for many habitat-dependent species. If one considers the cumulative impact on these natural areas, rather than considering one impact at a time as is the primary approach taken in the DEIS, one can only conclude that the construction of the Prairie Parkway would impose a substantial risk on the continued ecological integrity of these remaining natural areas.

5. Chapter 4 documents a number of adverse water quality impacts that could result from the detailed build alternatives, including sedimentation, salt runoff, heavy metals, oils and greases, and nutrients. The design for these build alternatives includes several measures that are intended to mitigate these runoff impacts, such as vegetated swales, detention basins, and infiltration basins. Although these systems

may reduce immediate pollutant loadings to area waterways and thus enable the project to avoid exceeding water quality standards in the near-term, the retention of these pollutants on-site will effect a build-up of these pollutants that represents a long-term concern. This build-up may exhibit a long-run adverse effect on both surface and groundwater quality, as well as local plant communities. As an example, the DuPage County Forest Preserve District has documented significant degradation to the plant community adjacent to Highway 355 due to salt runoff.

6. I am also very concerned with the ongoing loss of prime farmland. The DEIS documents the loss of 1,937 or 1,665 acres of prime farmland with the construction of the B2 and B5 alternatives, respectively. According to the American Farmland Trust, Illinois has the highest rate of loss of prime farmland in the country as a result of road construction and development patterns leading to urban sprawl. The loss of prime farmland, when combined with the various environmental impacts associated with either build alternative, makes this project ill-advised. Expansion of existing roads and shifting our focus to growth management and mass-transit-oriented strategies will greatly reduce the loss of prime agricultural land.

In closing, the two Prairie Parkway build alternatives B2 and B5 are being proposed in part to accommodate expected growth, but growth patterns are influenced by the location of infrastructure, including roads. The two are not independent of one another. In the Chicago region, we have the opportunity to manage growth by developing infrastructure that will not perpetuate the ongoing trend of sprawl, but that will encourage carefully planned development closer to existing public transportation corridors and away from sensitive natural areas and prime farmland. For the above reasons, I am strongly opposed to the construction of either the B2 or the B5 build alternatives. Thank you for the opportunity to comment on this DEIS.

Sincerely,

Peter W. Jackson
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