

February 26, 2007

Diane O'Keefe, P.E.
Deputy Director of Highways
Regional Engineer
Illinois Department of Transportation
District 3
700 East Norris Drive
Ottawa, IL 61350

RE: Prairie Parkway Draft Environmental Impact Statement

Dear Ms. O'Keefe:

Please accept the following comments as part of the permanent record for the subject project:

1. Item 3 in the purpose and need section of the report addresses the goal of increasing regional mobility from the study area to current and future jobs. This goal goes against most current 'smart growth' principles. It would be much better to promote a planning effort that promotes working closer to home. Item 3 in the purpose and need statement promotes suburban sprawl. I do not believe it is beneficial to the region to construct a facility that promotes job growth in other areas.
2. The proposed corridor runs adjacent to and crosses the Big Rock Creek and Welch Creek watersheds in Kane County. This area experienced very substantial flooding in July 1996. Many bridges were damaged and one Kane County Bridge over Welch Creek was completely washed away. This bridge was totally destroyed and never found. Also the earthen embankment between Big Rock Creek and the lake at Big Rock Forest Preserve was breached. The region was declared a federal and state disaster area. The area near the proposed interchange between the Parkway and Rt. 30 was under more than 10 feet of flood water. It is stated on page 2-88 of the DEIS that the floodplains of Big Rock Creek and Welch Creek are unstudied and do not have water surface elevations associated with them. In August of 2006 it was announced by Congressman Hastert that a federal grant was obtained through the earmarking process for Kane County to study the Big Rock Creek and Welch Creek floodplains and accurately map the base flood elevations. Hastert stated that the current available data was "outdated and rudimentary". He also stated that the study was needed to prevent future

flooding. I think it is very important to wait until accurate floodplain elevations are available in this area to site a major hard pavement transportation facility. If alignments can avoid flood prone areas they should be considered and we won't accurately know the flood prone areas until the mapping of the floodplain is complete. The location and design of the Rt. 30 and Parkway interchange is extremely critical.

3. The assumption in the DEIS that all of the projects listed in Table 3-1 will be completed by the year 2030 is extremely faulty. This list includes over 1 billion dollars of projects that are unfunded. To use this as a baseline skews all analyses. An alternate or alternates that include building some of the unfunded projects on a priority basis should be considered along with the 3 alternatives presented in the DEIS. This would be a much more accurate analysis when considering the spending of federal funds. To do a proper analysis a more accurate description of the 2030 situation is required.
4. It is stated on page 3-33 of the DEIS that future differences between the No-Action alternative and the build alternatives are very small for some performance measures. This is probably because of the skewed set of assumptions described in item 3 above. When considering the expenditure of very large amounts of federal money, alternates should be presented that at least show moderate improvements to performance measures. As stated above, alternates should be presented that have more accurate assumptions and provide more substantial improvements to regional mobility.
5. There was an inherent bias in this project from the start, particularly in the northern portion. A 400' wide corridor suitable for an interstate highway was protected by IDOT in 2002 prior to any significant engineering analysis. The purpose of corridor protection as stated by IDOT is to protect future transportation corridors in areas experiencing significant growth. Most of the protected corridor is in areas of no growth. Big Rock and Kaneville Townships in Kane County, where the corridor was protected and the proposed build alternates are located actually went down in population between 1990 and 2000. These are areas of no growth. Prior to the issuance of the DEIS Congressman Hastert put money in the 2005 federal transportation bill for the Prairie Parkway that was specifically allocated for an interstate freeway and an interchange at Rt. 34. This shows that there was a pre determined bias in favor of an interstate highway solution to regional transportation needs. The money was tied to a specific solution before any alternates were selected for the DEIS. The fact that the money was inserted as an earmark late at night with no public discussion supports the claim of bias. President Bush signed the transportation bill in Kendall and specifically mentioned the Prairie Parkway in his comments. This is the ultimate in political bias and

pressure. I believe that now that Hastert is no longer Speaker of the House, a more objective analysis can take place on how to best spend our limited transportation dollars. The NEPA process should be conducted in an atmosphere free of political influence. It is meant to be an open process that takes politics out of decision making when considering the spending of large amounts of federal money. The political pressure and influence used to date in the DEIS process create a biased solution to regional transportation needs. A more objective analysis is required.

6. The cost of Right-of-Way projected in Table 3-18 is greatly underestimated. It estimates that land can be purchased for less than \$4000 per acre. Very little land anywhere in the study area is available for this price. In the Kane County portion of the corridor land prices are between \$15,000 and \$20,000 per acre. This does not include damage to remainder calculations. Congressman Hastert recently sold land in Kendall County west of the proposed road for over \$30,000 per acre.
7. Several potential improvements that better meet the purpose and need were not studied. One in particular would be to keep the new highway east of Big Rock Creek and terminate the new road construction at Galena Road. Galena Road could be improved to Rt. 47 and Rt. 47 improved north to I-88. This would eliminate 2 crossings of Big Rock Creek which is highly rated environmentally. The interchange at Rt. 47 and I-88 could be improved to full access which would greatly improve regional mobility. Also the existing Rt. 47 / I-88 interchange is extremely dangerous and safety enhancements would support the purpose and need goal of improving safety. The issues addressed in item 2 above would also be mitigated.

Sincerely,

Michael W. McCoy, P.E.

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