

JAN STRASMA

MAPLE PARK IL 60151

Feb. 25, 2007

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

Dear Ms. O'Keefe,

I am submitting my personal comments on the Draft Environmental Impact Statement (DEIS) for the proposed Prairie Parkway. I oppose the construction of either the B2 or B5 Alternative – which are largely similar proposals to build a north-south highway connecting I-80 and I-88 – because the significant environmental impacts and nearly \$1 billion cost of such highway are not warranted by its “quite small” benefits – “quite small” as reported in the DEIS.

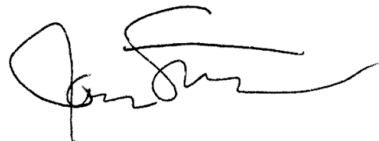
In addition, the DEIS fails to objectively evaluate a Local Road and Transit Alternative, which would provide a greater transportation benefit at a much lower environmental and economic cost.

As such, I call on the Federal Highway Administration to reject the proposed Prairie Parkway and urge the Illinois Department of Transportation to focus on implementing such a Local Road and Transit Alternative.

My comments on the draft DEIS are attached.

Thank you for your consideration of my comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jan Strasma', with a long horizontal flourish extending to the right.

Attachment: DEIS Comments

Comments on Draft Environmental Impact Statement – Prairie Parkway
Submitted by Jan Strasma, Maple Park IL 60151
February 25, 2007

DEIS Review Process Tainted by Predecision and Preselection

The environmental review process is biased by several factors which prejudice the outcome. These factors have biased the selection of the Prairie Parkway freeway option over a alternative providing improvements, expansion, and interconnection of the existing highway and transit network.

1. Funding: From the \$15 million earmark for the “Prairie Parkway” study to the \$207 million earmark for the “north-south” connector, the fact that federal money is available for the Prairie Parkway biases the outcome of the environmental impact process since alternatives B2 and B5 have received earmark funding, but the vast majority of the no-action alternative projects are unfunded. Further, the earmarked funds for a Highway 34 interchange designate with specificity that location of the highway and the type of highway planned (i.e. interchange vs. intersection).

2. Recording the corridor: In July 2002 the Illinois Department of Transportation recorded the Prairie Parkway corridor, restricting property rights for the affected landowners and preserving a corridor for the construction of the Prairie Parkway. While Alternative B2 and B5 vary in a number of ways from the recorded corridor, the endpoints for B5 and much of the general route follow the recorded corridor. The northern terminus of B2 and much of the shared route with B5 follow the recorded corridor with some local variation and then veers from the corridor south of Yorkville. However, recording the corridor indicates a bias for the single route, freeway solution whether it is represented by alternative B2 or B5.

3. Statements by Tim Martin, Secretary, Illinois Department of Transportation: *Timothy Martin, transportation secretary for Democratic Gov. Rod Blagojevich, cites work on Wacker Drive, involving the reconstruction of its north-south portion, the Mississippi bridge and the connector highway for I-80 and I-88 as priorities. “These are three key projects that are absolutely needed. We’re not talking about fluff or anything,” he said. (Associated Press, published in the Daily Herald, March 9, 2003)*

4. Statements by Rep. Dennis Hastert: In his role as Speaker of the House and Representative of the 14th Congressional District, Dennis Hastert has wielded considerable political influence, both publicly and privately, in support of the Prairie Parkway as a transportation solution as opposed to the no-action alternative. At the Conference Committee stage, he inserted two earmarks totaling \$207 million into the 2005 federal transportation bill, including a \$52 million earmark specifically for the US 34 interchange which has dictated the portion of the Prairie Parkway which would be built first – and perhaps the only section which would be built, given state and federal budgetary constraints.

Justification for Prairie Parkway alternative

1. The DEIS does not demonstrate a justifiable need for selecting the Prairie Parkway (Alternatives B2 or B5) over the “no action alternative.” It acknowledges that the benefits of the two highway alternatives “appear to be quite small.” According to IDOT’s own numbers, the average speed on regional roads in 2030 would be 21.84 miles per hour if the Prairie Parkway is built, just a fraction faster

than the average speed of 21.63 mph if the highway is not built. This and other data reported on the projected improvements in traffic conditions simply do not justify the cost of the Prairie Parkway – financial, environmental, and societal.

2. The DEIS proposes a highway without justifying how a four-lane north-south highway west of IL-47 will really help with future traffic congestion. The different transportation needs of the area are best met by a diverse network of roads. Instead of spending \$1 billion dollars of tax money on an ineffective highway, our State should invest in other roadways that will better serve residents in the project area. Major projects that merit funding include: the Eldamain Road expansion and bridge, (which creates a Yorkville western bypass by connecting to Galena Road); the WiKaDuKe Trail, (which connects I-80 and I-88 by upgrading and connecting existing roads at the eastern edge of Kendall County); and expansion and improvement of the entire stretch of Illinois 47 between I-80 and I-88. Aside from widening the southern portion of Illinois 47, there are no design plans or funding for these projects at this time.
3. .Building a freeway is the easiest alternative: A single project like the Prairie Parkway requires significantly less planning and coordination than making a number of improvements to area roads which involve multiple levels of government and jurisdiction. However, making the job easier for the highway bureaucracy is not a valid basis for making a transportation decision.

Omissions in the DEIS Process

1. The DEIS addresses the impact of improving Illinois 47 from Caton Farm road to I-80, but does not include the impacts of anticipated improvements of Illinois 47 from Caton Farm Road to I-88. These improvements are included in various plans and projections, but there is no certain funding source and no assurance that they will be completed. The full length of Illinois 47 from I-80 to I-88 should be included in the DEIS. To do otherwise, segments the impacts of the expansion and improvements to Illinois 47.

2. What are the impacts of the roads providing access to the Prairie Parkway? What are the financial costs as well as environmental and other costs associated with municipal, township, county, and state roads which will carry increased traffic to reach the Prairie Parkway.

6. Full Prairie Parkway project versus construction of a truncate Illinois 71 to US 30 route.: The DEIS focuses on the full project. IDOT has included a much shorter “Yorkville Bypass” in its 2007-2012 Highway Program – a freeway route from Illinois 71 to US 30. There are significant impacts to this truncated project that are not addressed in the DEIS.

a. The northern terminus at US 30 becomes much more significant, both from a traffic flow point of view and from an environmental point of view. The design of the interchange appears to be designed to direct traffic from the Prairie Parkway onto US 30 and then east through the Illinois 56 access to Interstate 88.

If the Prairie Parkway were to continue north directly to I-88, this interchange may follow a different design since the traffic pattern would be significantly different.

b. Similarly, what is the design consideration for the southern termination of the “Yorkville Bypass,” providing connection to Illinois 47 by way of Illinois 71. What is the

traffic pattern from the Prairie Parkway to Illinois 47? What are the environmental impacts and the traffic impacts of the Illinois 71 terminus?

Inadequate consideration of environmental impacts

1. The DEIS underestimates the direct, indirect, and cumulative effects of the B2 and B5 alternatives on pristine waterways, such as the Fox River, Big Rock Creek, Welch Creek and Aux Sable Creek. The B2 alternative could also have deleterious effects on Nettle Creek and its tributaries.

Municipal impacts and land use planning

1. Building the Prairie Parkway along either of the proposed routes would induce unmanaged growth that is inconsistent with county and municipal land use plans. This growth would destroy prime farmland and further encroach upon natural areas.

2. The DEIS identifies five municipalities as affected by the Prairie Parkway (Sugar Grove, Yorkville, Plano, Minooka, and Morris). It totally ignores two municipalities where are directly impacted by the Prairie Parkway (Kaneville and Big Rock) and one which is near the proposed route (Newark). Further, it does not address the impacts on unincorporated communities, most notably Helmar in Kendall County.

Village of Big Rock

Section: 2.1.7 Local Planning

Section 4.1.7 Land Use Plans

Section 4.15.5 Environmental Protection and Land Use Control Laws, Ordinances and Programs

The DEIS fails to mention the Village of Big Rock which is probably more adversely affected by the proposed Prairie Parkway than any of the other listed municipalities. This is an egregious omission which occurs at several points in the above sections and perhaps elsewhere in the DEIS.

The Village of Big Rock has sought to maintain its small community atmosphere and has developed a comprehensive land use plan accordingly. IDOT should consult with the village and address the impact of the Prairie Parkway on the village's land use plans.

Further, the village's land use plan does not address the Prairie Parkway corridor.

Village of Kaneville

The Village of Kaneville was formed in 2006 and is now developing its land use plans. Kaneville is not included as one of the affected municipalities in Section 2.1.7 and elsewhere in the DEIS. One of the reasons for formation of the village was the residents desire to maintain its small community atmosphere and to avoid development threats caused by annexation of nearby tracts to the Village of Sugar Grove.

Note: Page 4-116 states that with the no-action alternative, the western third of Kane County is projected to have "little to no growth." This is the area that with Alternative B2/B5 would have significant impact on growth, which is not acknowledge in the text. Big Rock and Kaneville townships, which include the B2/B5 corridor are in those townships, and thus they would experience significant induced development.

While the village's plans are still being formulated, IDOT should consult with the village to determine how it views the impact and consequences of the Prairie Parkway.

Helmar

This long-established agricultural community in Kendall County would be divided and severely impacted by the route of the B2/B5 alternatives, particularly in the modified B5 route paralleling Caton Farm Road. The B2 alternative would cut off the community to the west and the B5 alternative would cut through the center of the community.

There is no consideration of the impacts of the highway on this community. This long-standing community is an important social, cultural, and agricultural asset that should not be diminished by a highway. Ironically, the DEIS process gives greater consideration to developers planning a new subdivision than to the welfare of a long-established community. The no-action alternative with its emphasis on improving existing roadways would have significantly lesser impact on this community.

Stand alone arterial road alternatives (see table 3-3)

These alternatives include combination of Illinois 47 with one or two of the other arterial routes -- Wikaduke, Dauberman/Eldamain/Saratoga, and Orchard/Grove/Brisbin -- but the combination of all the arterials with Illinois 47 was apparently not included.

Further, there is no indication of the relative merit of the arterial combinations -- do they meet 90 percent of the traffic needs? Or 60 percent? Do the recommended Prairie Parkway alternatives meet 100 percent of the traffic needs? Or 80 percent?

Clearly, to make an informed decision, the relative success of the alternatives is needed to be weighed against the costs, both financial, social, and environmental. Surely, if it costs \$1 billion to go from 90 to 91 percent, then the no-action alternative would be the preferred solution.

The DEIS, however, provides an adequate basis for making that relative decision.

Funding for No-action Alternative

The DEIS assumes that the projects included in the no-action alternative will be built whether or not the Prairie Parkway is built.

Cost estimates for some of the projects in Table 3-1 are included in the TIP. Those projects total about \$400 million. Of the two major interstate projects, adding lanes to I-80 and I-55, there are no costs listed for the I-80 expansion, but the I-55 improvements are listed at \$343 million.

These estimated costs indicate that the total needed to complete the projects in Table 3-1 is likely well in excess of \$1 billion.

Because of the magnitude of the cost of the Prairie Parkway, however, it is highly likely that some of the projects in the no-action alternative will not be built if the Prairie Parkway is built. Given current and expected fiscal constraints there will likely be insufficient funds to build the Prairie Parkway and complete the Table 3-1 projects (and others in the TIP). The traffic studies appear to be based on a Prairie Parkway plus other planned improvements rather than a Prairie Parkway or other planned

improvements. There is no basis for concluding that funding for all these projects may be available.

Completeness of No-Action Alternative

The No Action Alternative is based on the Transportation Improvement Program (TIP) for 2007-2012, prepared by the Chicago Area Transportation Study.

However, there is no clear description of the no-action alternative, since the TIP includes projects that are excluded from the alternative, the alternative apparently includes projects not in the TIP, and meritorious projects are ignored.

The DEIS should be revised to provide a clear description of the projects to be included in the no-action alternative (and corresponding projects that are relied upon as supplements to the B2 and B5 alternative).

In action, the no-action alternative includes extensive highway improvement and development.

Table 3-1 of the DEIS purports to be a listing of study area transportation improvement plan projects. It lists 49 projects, although 16 projects are marked as being excluded from the No-Action alternative. Three additional projects are marked as being excluded from the 2007-2012 TIP, but listed in previous TIP listing. Their status is therefore unknown.

A number of projects are also listed in Table 3-1 which would have negligible impact on traffic conditions in the area, since they are essentially local projects (e.g. First Street bridge in Batavia, adding lanes on Randall road between IL 64 and IL 38, the Anerson Road grade separation, the Arsenal Road interchange at I-55).

In some cases, a portion of a project is included in Table 3-1 when much fuller improvements are listed in the TIP. For example, Table 3-1 includes adding lanes on I-80 from I-55 to US 45. The TIP includes that project, but, in addition, adding lanes from the Grundy County line to US 55, which would have a significant impact on the study area.

There are several critical projects in TIP but not listed in Table 3-1 and, therefore, apparently not included in No-Action Alternative:

Metra BNSF commuter line extension to Yorkville and Plano. Table 3-1 includes Metra extension to Montgomery and Oswego but not to Yorkville and Plano. *This is a serious oversight since the Yorkville and Plano areas are the principal population areas to be served by the Prairie Parkway.*

Illinois 47. The only Illinois 47 improvements listed in Table 3-1 are a full interchange at I-88 and additional lanes (5 lanes total) from Illinois 71 to US 34 in Yorkville.

IDOT appears to rely on plans for other improvements to Illinois 47 between Caton Farm Road south of Yorkville and I-88 north of Sugar Grove. The only projects in the TIP (but not in Table 3-1) are resurfacing (not expansion) of Illinois 47 between Galena Road and Seavey Road (portions of which are 2-lane and portions are 4-lane) and intersection improvement for Illinois 47 at US 34 in Yorkville.

These other improvements are not listed in the DEIS, but are in separate project lists that may or not be funded:

Improvement of Illinois 47 from north of US 34 to Cross St. in Sugar Grove is listed in the IDOT 2007-2012 Highway Plan (\$1.2 million - Phase 1 project engineering).

Sugar Grove Resurfacing from Galena Blvd to Seavey Road (4.05 miles), including bridge work at I-88. (\$4,150,000 - 2007-2012 Highway Improvement Program)

Gaps in planned improvements of Illinois 47 appear to be from Caton Farm Road to Illinois 71 and the resurfacing project in Sugar Grove does not include widening of the section from Sugar Grove to I-88, most of which is currently two lanes.

East-west routes not considered in the No-action alternative

The no-action alternative focuses on north-south routes. However, east-west routes are significant contributors to traffic movement, both as access to the north-south routes, but also because jobs tend to be east of the study area – the traffic flow tends to be either to the northeast or the southeast rather than directly north-south.

Therefore, several east-west routes should be added to the no-build alternative. In some cases, these routes are included in the TIP but not Table 3.1.

Caton Farm Road – Adding lanes to this route is included in the TIP (Grove to Ridge in Kendall County and the County Line to Illinois 59 in Will Count), although the route from Grove west to Illinois 47 is not included and, apparently, there is a gap between Ridge and the County Line in the expansion plans.

Caton Farm Road is a potentially important connector between Illinois 47 and the Wikaduke Trail (Ridge Road) and east to Illinois 59, the three principal north-south routes in the eastern part of the study area as well as the Saratoga/Lisbon/Eldamain arterial corridor.

US 52 – There are apparently no plans for expansion of US 52 between the Saratoga/Lisbon/Eldamain arterial corridor and Illinois 59. This should be an important connector between the north-south routes.

Illinois 71 – Table 3-1 includes adding lanes between Illinois 47 and Orchard Road, which is not included in the TIP, but does not include adding lanes on Illinois 71 from Orchard east, which is included in the TIP.

95th Street – Table 3-1 includes an extension from Knoch Knolls Road to Boughton Road, but not other improvements to 95th Street in the TIP (US 30 to Illinois 59).

Wolfs Crossing Road – This is another local arterial that provides east-west connection but which is not included in Table 3-1.

Impact on adjacent agricultural businesses

The DEIS does not adequately address the impact on adjacent agricultural business. As an example, Cottonwood Farm, located on Dauberman Road just west of the planned US 30/Prairie Parkway interchange, is one of the largest horse breeding operations in Illinois. As Terry Hunt, the owner, states: “Horses and highways don’t mix.” The noise

and congestion of the Prairie Parkway and interchange will have a deleterious effect on their horse breeding business.

Section 4.5 – Noise impacts

The DEIS indicates that noise abatement is feasible and reasonable for a subdivision and a school – what about planned subdivisions, currently in the planning stages, and subdivisions which will be built because of the presence of the Prairie Parkway. What provision will there be for noise abatement and what will the costs be.