

# Draft Environmental Impact Statement Comments and Responses

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IN REPLY REFER TO:

# United States Department of the Interior

OFFICE OF THE SECRETARY  
Office of Environmental Policy and Compliance  
Custom House, Room 244  
200 Chestnut Street  
Philadelphia, Pennsylvania 19106-2904



May 14, 2012

9043.1  
ER 12/224

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

Dear Mr. Stoner:

This responds to your request for comments on the Tier Two Draft Environmental Impact Statement (DEIS) for the Elgin O'Hare – West Bypass project. The Federal Highway Administration, Federal Aviation Administration (FAA), Illinois Department of Transportation (IDOT), and Illinois State Toll Highway Authority (Illinois Tollway) have prepared the Tier Two DEIS to study transportation solutions for the Elgin O'Hare – West Bypass project corridor. With respect to those portions of the DEIS for which the U.S. Department of the Interior or its bureaus have jurisdiction or special expertise, we offer the following comments and recommendations for your consideration.

The U.S. Fish and Wildlife Service reviewed the information provided in your Tier Two DEIS, and we have participated in reviewing the project as part of the Statewide National Environmental Policy Act/Clean Water Act Section 404 Merger process. During Tier One, we checked our records for the presence of federally listed species, U.S. Fish and Wildlife Service trust resources, and other fish and wildlife resources that may be affected by the proposed project. Based on our review we offer the following comments, as they relate to fish and wildlife resources, which should be addressed in the Tier Two Final Environmental Impact Statement (FEIS).

## Alternatives (Section 2)

### **Drainage- Subsection 2.2.2.7**

We agree with the applicant's description of our concerns in this section. We do note that while the resource agencies (U.S. Fish and Wildlife Service, U.S. Army Corps of Engineers, and U.S. Environmental Protection Agency) have recommended the use of certain best management practices (BMPs) to offset the anticipated stormwater impacts to downstream aquatic resources, the FAA has voiced concerns about the potential risk of BMPs that may attract wildlife and the associated risk of avian/aircraft collisions. We remain committed to working with FAA to identify adequate BMPs, particularly infiltration BMPs, that can be used within the project

- 1 | corridor to address our water quantity and quality concerns, while also addressing the avian/aircraft collision risk concerns.
- 1 | We also support the development of the BMP plan, which will define the location, type, and effectiveness of the proposed BMPs. As mentioned in the DEIS, we plan to participate in development of the BMP plan.

**Environmental Resources, Impacts, and Mitigation (Section 3)**

**Noise- Subsection 3.8**

- 2 | Noise impacts to wildlife resources are not discussed in this section. Noise impacts to wildlife resources are discussed in subsection 3.14.2.3, as it relates to traffic noise impacts on wildlife. Section 3.8 should mention that potential impacts on wildlife were considered and are discussed in subsection 3.14.2.3.

**Water Resources and Aquatic Habitats- Subsection 3.10**

**3.10.3.2 – Operation (Including FAA Guidance)**

- 1 | As noted in our comments for subsection 2.2.2.7, we will continue to work with FAA to achieve a mutually agreed upon solution that addresses all agency concerns.

**Wetlands- Subsection 3.13**

**3.13.3.2 – Wetland Compensation**

- 3 | This subsection mentions that prior to the FEIS, the resource agencies will review the proposed mitigation site(s) and determine which site(s) are best to compensate for the loss of wetlands associated with the project. The U.S. Fish and Wildlife Service plans to participate in the development of the final mitigation approach.

- 4 | Due to the high-quality wildlife habitat identified at Sites 84 and 125, we recommend that the mitigation ratio for these wetlands be at least 5.5:1. Table 3-47 shows that the proposed mitigation ratios for Sites 84 and 125 are 2:1.

**Natural Resources- Subsection 3.14**

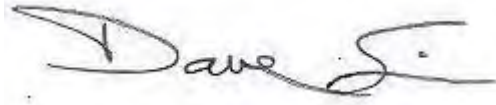
**3.14.3.2 – Wildlife Resources**

- 5 | We recommend that the Illinois Tollway and IDOT incorporate wildlife passage features into the project. The features should be incorporated along riparian corridors, greenways, etc. (e.g., at the Ned Brown Forest Preserve corridor, the Salt Creek corridor, the West Branch of the DuPage River corridor) identified in the DEIS. Wildlife passage features such as oversized culverts (at least 36 inches or larger) with shelves on one or both sides of a stream, to allow dry passage during high water periods, would be beneficial for wildlife (small mammals, reptiles, and amphibians) along corridors and greenways that have been identified as areas that provide connectivity and allow for animal movement between habitats.

This letter provides comment under the authority of, and in accordance with, the provisions of the National Environmental Policy Act of 1969 (83 Stat. 852, as amended P.L. 91-190, 42 U.S.C. 4321 *et seq.*), the Fish and Wildlife Coordination Act of 1956 (48 Stat. 401, as amended; 16 U.S.C. 661 *et seq.*), the Endangered Species Act of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*), the Migratory Bird Treaty Act (40 Stat. 755, as amended; 16 U.S.C. 703 *et seq.*), and the Bald and Golden Eagle Protection Act (54 Stat. 250, as amended; 16 U.S.C. 668-668d).

If you have any questions, please contact Mr. Shawn Cirton at 847/381-2253, ext. 19.

Sincerely,

A handwritten signature in black ink that reads "Dave Sire". The signature is fluid and cursive, with a large initial "D" and a stylized "S".

Dave Sire  
Natural Resources Management  
Team Leader

cc:  
FWS, Shawn Cirton



# Illinois Department of Transportation

Division of Highways/Region One / District One  
201 West Center Court/Schaumburg, Illinois 60196-1096

October 5, 2012

Mr. Dave Sire  
U.S. Department of Interior  
Office of the Secretary  
Office of Environmental Policy and Compliance  
Custom House, Room 22  
200 Chestnut Street  
Philadelphia, Pennsylvania 19106-2904

Re: Elgin O'Hare – West Bypass Project  
Response to comment on the Draft Environmental Impact Statement

Dear Mr. Sire:

Thank you for your comments on the Elgin O'Hare – West Bypass Draft Environmental Impact Statement (EIS). We offer the following in response.

Water Quality and Best Management Practices

We understand from your comments that USFWS remains committed to working with the Federal Aviation Administration (FAA) to identify Best Management Practices (BMP) that can be used in the project corridor to address water quality/quantity concerns, while also addressing avian/aircraft collision risk concerns.

1

- We appreciate the input that USFWS has provided to date regarding BMP. As final design progresses, BMP development will continue to be coordinated with USFWS, FAA, and other resource agencies. This issue was discussed in greater detail at a recent meeting on July 23, 2012. At this meeting, USFWS and other resource agencies (including the U.S. Army Corps of Engineers (USACOE), U.S. Environmental Protection Agency (USEPA), and FAA) agreed, in principle, that the BMP concept plan developed for the EO-WB had sufficient detail for the Final EIS, and that specific details could be coordinated during the Section 404 Clean Water Act permitting process.

Noise

Your office requested that subsection 3.8 (Noise) "mention that potential noise impacts on wildlife were considered and are discussed in [Draft EIS] subsection 3.14.2.3."

2

- An appropriate reference will be provided in the Final EIS in subsection 8 (Noise).

Wetland Compensation

Your office noted that USFWS plans to participate in the development of the final mitigation approach.

- Information on several potential wetland mitigation sites has previously been provided to USFWS for review and comment. The selection of wetland mitigation sites and other wetland mitigation details will continue to be coordinated with USFWS, as well as other resource agencies. This issue was discussed in greater detail at the July 23, 2012 meeting with USFWS and other resource agencies.

Your office also recommended that impacts to wetland Sites 84 and 125 be mitigated at a ratio of at least 5.5:1, due to the high quality wildlife habitat that was identified by the Illinois Natural History Survey (INHS) during the wetland delineations.

- Please note that both of these wetlands are relatively large (7.4 acres or larger in size) and the potential impacts have been reduced to 0.21 acres or less at each wetland. The impacts would also be located at the lower quality wetland perimeter adjacent to existing roads. Both wetlands are dominated by common/invasive plant species, including reed canary grass (*Phalaris arundinacea*), narrow-leaved cattail (*Typha angustifolia*), or common reed (*Phragmites australis*). Neither wetland would be considered high quality from a floristic quality standpoint (both C-values  $\leq 2.4$ ; FQI  $\leq 15.1$ ), and this project is not anticipated to affect the wildlife habitat quality or functions of the wetlands.
- Additional wetland avoidance/minimization strategies will be evaluated as engineering design progresses and as part of the Section 404 Clean Water Act permit process. Final wetland compensation ratios will be coordinated with the Illinois Department of Natural Resources (IDNR) under the 1989 Interagency Wetlands Policy Act and with the USACOE under Section 404 of the Clean Water Act.

Wildlife Resources

Your office recommended that the project incorporate wildlife passage features along riparian corridors, and greenways (e.g., at the Ned Brown Forest Preserve corridor, Salt Creek corridor, and West Branch DuPage River corridor).

- Terrestrial wildlife crossings were considered for inclusion within riparian corridors/stream crossings and greenways. In general, the greenways and riparian corridors that cross the project are located at the stream crossings (see Exhibit 3-20 in the Tier Two Draft EIS).

Mr. Dave Sire  
October 5, 2012  
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- The proposed project primarily includes improvements to existing roadways. These roadways are already, for the most part, barriers to wildlife movement. Proposed stream crossing structures generally match existing or nearby crossing treatments. Because most of the project corridor is located along an existing transportation network, most of the stream crossings exist in the current condition and would be extended with the roadway improvements. For example, at Meacham Creek, Addison Creek, and the Devon Avenue Tributary (at I-290), the existing box culverts are to remain in place. The culverts will be extended at one or both ends. Because the existing culverts are to remain in place, no additional terrestrial wildlife crossings are proposed at these locations as part of this project.
- Two airports are located adjacent to the project corridor. Wildlife is managed and discouraged on airport property. The O'Hare Airport *Wildlife Hazard Management Plan* strictly limits the type of wildlife that is allowed to cross into the airport. In accordance with FAA policy, to minimize wildlife passage onto O'Hare Airport, no terrestrial wildlife crossings are proposed at "new" creek crossings (e.g., Willow Creek, Willow Creek South Tributary, Bensenville Ditch) located immediately adjacent to, or located on, existing O'Hare Airport property.
- New bridges would be required at Higgins Creek (at I-90) and Salt Creek (in the proposed Elgin O'Hare corridor). These new bridges would be installed in close proximity to existing bridges that would remain in place. The existing bridges limit terrestrial wildlife movement. The final bridge designs would accommodate aquatic biota, small mammal, reptile, and amphibian movement to the extent practical and feasible. Opportunities to accommodate terrestrial wildlife movement will continue to be evaluated during final design. However, due to existing constraints it is unlikely that the final designs will accommodate large terrestrial mammal movements beyond that which occur under existing conditions.

IDOT and the Illinois Tollway will continue to coordinate with your office.

If you have any questions or need additional information, please contact me or Ron Krall, Project Manager, at (847) 705-4103 or by e-mail at [ronald.krall@illinois.gov](mailto:ronald.krall@illinois.gov).

Very truly yours,



John Fortmann, P.E.  
Acting Deputy Director of Highways,  
Region One Engineer

cc: Shawn Cirton, USFWS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

MAY 24 2012

REPLY TO THE ATTENTION OF:

E-19J

Norman Stoner, P.E.  
Division Administrator  
Federal Highway Administration  
3250 Executive Park Drive  
Springfield, Illinois 62703

Re: **Comments on the Draft Environmental Impact Statement for the Tier 2  
Elgin O'Hare-West Bypass, Cook and DuPage Counties, IL, CEQ# 20120088**

Dear Mr. Stoner:

In accordance with Section 309 of the Clean Air Act and the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (EPA) has reviewed the proposed Draft Environmental Impact Statement (DEIS) for the Tier 2 Elgin O'Hare-West Bypass, in Cook and DuPage Counties, Illinois.

EPA participated in the Tier 1 NEPA process for this project, and extensively on this Tier 2 development through the merged NEPA / Clean Water Act Section 404 (NEPA / 404) process. We are a cooperating agency for this project.

A build alternative and a no-build alternative are presented in the DEIS, following considerable public involvement.

EPA rates the Tier 2 DEIS as EC-2, Environmental Concerns - insufficient information. See the attached Summary of Rating Definitions for an explanation of EPA's rating system. Our following comments on Purpose and Need, Alternatives, Environmental Impacts, and Mitigation of Impacts support our rating.

**PURPOSE AND NEED**

1 The project retained the Tier I NEPA statement of Purpose and Need. We concurred with the Purpose and Need (P&N) statement for the Tier 2 NEPA proposal on September 8, 2011.



## ALTERNATIVES

2 The Tier 1 study reached consensus on the corridors to be carried into the Tier 2 study. The Tier 2 study has updated the baseline and project horizon traffic data and planning references. These provided the basis for modifying some of the project design and interchange needs. Funding for the proposed routes is a major aspect of the Tier 2 considerations. The range of alternatives to be considered for the project was presented at our merged NEPA/404 meeting and EPA concurred with the Range of Alternatives on October 17, 2011. The preferred alternative presented in the DEIS has all components of the Elgin O'Hare Extension West and the West By-Pass to be funded as tolled facilities through the Illinois Tollway Authority.

## ENVIRONMENTAL IMPACTS

### Air Quality

3 The DEIS correctly presents that this project has consulted with EPA in developing its air quality modeling. EPA concurs that the project conforms with the State Implementation Plan (SIP). Although construction dust and particulate matter are temporary air quality concerns, we recommend Best Management Practices (such as water mist) be utilized to reduce these pollutants when possible and when conditions such as windy days warrant. We commend the three Special Provisions that Illinois Department of Transportation (IDOT) commits to for reducing construction diesel emissions: retrofitting off-road construction equipment including repower or engine upgrades, using ultra-low-sulfur fuels for all equipment, and idling restrictions. Although not required by EPA regulations, we recommend additional voluntary measures be considered in an expanded diesel emissions reduction plan, including:

- (a) limiting the age of on-road vehicles in construction projects to 1998 and newer and 1996 and newer for off-road equipment
- (b) diesel particulate traps and oxidation catalysts
- (c) using existing power sources or clean fuel generators rather than temporary power generators
- (d) encouraging the use of off-road equipment that meets the Tier 3 standards.

### Wetlands

4 EPA has participated in a number of NEPA/404 meetings to specifically discuss wetland and other water impacts. Due to Federal Aviation Administration safety requirements regarding bird hazards near airports, the transportation and resource agencies have not yet reached consensus on several related topics. For example, project participants have not yet reached an agreement on the true extent of wetland impacts.

On page 3-171, the DEIS indicates that agencies would prefer "Advanced Mitigation." Although EPA recommends that IDOT considers potential mitigation sites early in the process, EPA would prefer that IDOT not select a mitigation option outside the Clean Water Act Section 404

permitting process. To be consistent with the 2008 Federal Mitigation Rule, IDOT would need to go through the Wetland Mitigation Banking Process as outlined in the Mitigation Rule to pursue "Advanced Mitigation."

4

The DEIS lists potential sites for emergent "Wetland Creation" opportunities. Please note that wetland restoration is more likely to succeed than wetland creation and is preferred by EPA over wetland creation. We further recommend that forested wetland impacts, approximately 3.6 acres, and shrub wetlands, approximately 2.4 acres, be compensated for with in-kind mitigation. The potential mitigation sites, as listed, do not include any forested or shrub potential restoration sites.

Streams and Floodplains

5

We commend IDOT for alignment adjustments made to reduce impacts to streams and floodplains. We note that design features are routinely being planned for a 50-year flood level. We recommend these stream and floodplain crossings be redesigned taking forecast climate change and recent flooding history into consideration. Storm frequency and storm intensity have increased in recent decades. We believe these considerations may warrant using a 100-year or even 500-year flood level reference in designing stream protection and bridging/crossing structures.

6

Regarding stream impacts, Table 3-34 lists direct impacts to streams. Because these impacts include additional stream enclosures, the project must compensate for the proposed impacts. We recommend that the Tier 2 Final EIS include a more detailed description of the additional stream enclosures (i.e. total length of stream enclosed) and describe the proposed compensatory mitigation measures for these stream losses. Four of the potential wetland mitigation sites provided may also contain stream mitigation opportunities. EPA would support incorporating stream restoration on these sites. As we have stated at meetings, we would also support

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replacing culverts with three-sided natural bottom structures to reestablish a more natural watercourse under the roadway and to provide opportunities for stepped banking, thus providing wildlife paths of connectivity.

8

Riparian buffers along streams have important functions as noted on page 3-195. The referenced Sections 3-10 and 3-13 are not clear about how riparian impacts will be specifically mitigated. We recommend that even though the existing habitats are of low quality, their functions need to be reinstated. Specifically, we are concerned about the functions of providing cover for fish and wildlife, keeping streams cool, minimizing bank erosion and enhancing soil stability, contributing organic materials to the food chain, and providing areas of dappled sunlight environments for aquatic life forms. We believe these can be created without compromising the FAA safety requirements.

Stormwater Runoff

9

Discussion of the many sites where stormwater runoff will occur and how to manage these streams are still under way in our NEPA/404 merged meetings. The Tier 2 Final EIS should

9 include a conclusive discussion of which IDOT best management practices (BMPs) will be utilized to attain both effective management of these waters, including pretreatment before discharging to waterways, and meeting FAA requirements for safety. As mentioned in the DEIS, we expect to participate in development of such a BMP plan.

### 10 MITIGATION of IMPACTS

We commend the DEIS preparers for their inclusion of Sections 3-21 and 3-22. Many impacts are appropriately addressed in the DEIS, including mitigation proposals. While Table 3-54 is very useful in identifying the possible impacts of the project build alternatives, we recommend that a similar summary table be included in future NEPA documents, clarifying each impact within categories, and providing sufficient information for each specific impact and associated mitigation to be identified and understood as to location, nature of what is impacted (i.e. size, quality, description, etc.), and the specifics concerning mitigation for that impact. Where appropriate, indicate any commitments to mitigation monitoring and maintenance, including goals, and indicate what entity will manage proposed adaptive management mitigations.

We appreciate the opportunity to review this document. If you have any questions, or wish to discuss our comments further, please contact me or Norm West of my staff at (312)-353-5692 or at west.norman@epa.gov.

Sincerely,



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

Cc: Peter E. Harnet, IDOT  
Shawn Cirton, U.S. Fish and Wildlife Service  
Kathy Chernich, U.S. Army Corps of Engineers



# Illinois Department of Transportation

Division of Highways/Region One / District One  
201 West Center Court/Schaumburg, Illinois 60196-1096

October 4, 2012

Mr. Kenneth A. Westlake  
Chief, NEPA Implementation Section  
U.S. Environmental Protection Agency, Region 5  
77 West Jackson Boulevard  
Chicago, IL 60604-3590

Re: Elgin O'Hare – West Bypass Project  
Response to comment on the Draft Environmental Impact Statement

Dear Mr. Westlake:

Thank you for your comments on the Elgin O'Hare – West Bypass Draft Environmental Impact Statement (EIS). We offer the following in response.

- 1 Purpose and Need  
We acknowledge your comment that the Purpose and Need was carried forward from Tier One and concurred upon by NEPA/404 Merger Group members in September 2011.
- 2 Alternatives  
Your office stated that consensus was reached on the Tier One alternative to carry forward into Tier Two. Furthermore, updated design horizon and traffic information has influenced the detailed design advanced on the Tier Two alternatives. USEPA provided concurrence on the Tier Two Range of Alternatives in October 2011. The Build Alternative comprises the Elgin O'Hare Extension and the West Bypass as a tolled facility.
  - The USEPA has been very involved with the overall Elgin O'Hare – West Bypass process from its very beginnings in 2007. Your office has assisted in the development of alternatives, and has carefully reviewed the analysis leading to the alternatives carried forward. As mentioned, the USEPA and other agencies concurred with the Tier Two alternatives to be carried forward on October 17, 2011. Concurrence for the preferred Tier Two alternative was received on September 6, 2012.

Mr. Kenneth A. Westlake  
October 4, 2012  
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Air Quality

Your office stated support for the project's air quality techniques and advocated for use of Best Management Practices (BMP) to minimize construction impacts on air quality.

- 3
- This project used the latest FHWA air quality model in the analysis of PM 2.5 emissions and green house gases. The approach in the analysis was fully coordinated with USEPA, IEPA, CMAP, IDOT, and FHWA. The outcome of this process now serves as an example for others throughout the country. In reference to construction related dust control and the reduction of diesel emissions, the Illinois Tollway has developed proactive specifications for the control of each as written in the Tollway's Supplemental Specifications Section 107.3 (Dust Control), and Section 107.37 (Diesel Emissions). Furthermore, the Illinois Tollway specifies that portable message signs be solar powered, thus avoiding uncontrolled emissions from small engines (Section 1201.02). The other examples for reducing air emissions during construction will be taken under consideration.

Wetlands

Your office indicated preferences related to wetlands including: (1) selection of a final mitigation option during the Clean Water Act Section 404 permit process – not prior; (2) wetland restoration over wetland creation; and (3) forested wetland and scrub-shrub wetlands be mitigated in-kind.

- 4
- We discussed wetland mitigation in greater detail at the July 23, 2012 meeting with your office and other relevant resource agencies. The preference for wetland restoration over wetland creation was discussed at that meeting and is noted.
  - Information regarding several potential wetland mitigation sites (off-site, but within the Des Plaines River watershed) was previously provided to your office for review and comment.
  - Potential mitigation sites were also discussed at the July 23, 2012 meeting. The mitigation approach and site selection will continue to be coordinated with your office (and the other resource agencies). Although we may refine the list of potential mitigation sites and continue to discuss options prior to permitting, a final decision regarding wetland mitigation approach and site selection will be completed during the Section 404 permitting process.

4

- If a final decision is made to provide wetland mitigation off-site, the mitigation plans (including proposed community types) will be coordinated with the property owner/entity that will be responsible for long-term management (e.g., forest preserve district) as well as with state and federal resource agencies. As part of this coordination, a conceptual plan that identifies proposed community types will be prepared.

Streams and Floodplains

Your office recommended that stream and floodplain crossings be re-designed to consider the 100-year or 500-year storm events (regarding stream protection and bridging/crossing structures).

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- As part of the proposed improvements, several existing roadways will be widened. Several of the drainage structures along these roads will remain in place and will be extended, as necessary. The Elgin-O'Hare Expressway will be extended east from IL Route 53 to O'Hare Airport (within the existing Thorndale Avenue corridor). Existing Thorndale Avenue will be re-established as a frontage/service road that will flank the proposed Elgin-O'Hare Expressway. The West Bypass will be constructed on new alignment.
- All new crossing structures have been designed in accordance with state and federal requirements. Existing structures that will remain have also been evaluated. If the existing structures need to be upgraded, they will be replaced to meet design requirements. Proposed erosion controls (including stream protection) will be designed in accordance with National Pollutant Discharge Elimination System (NPDES) requirements and will be reviewed as part of the Clean Water Act Section 404 permit process.
- As noted in the comments, structures are designed for the 50-year storm. However, larger storm events (up to the 500-year storm) are considered in design. For example, as part of the drainage design process, analyses are completed to confirm that the 500-year flood stage will not overtop the roadway edge of pavement according to Illinois Tollway design criteria.

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Your office requested that the Tier Two Final EIS include more detail on the additional stream enclosures (i.e., total length of stream enclosed) and that the proposed compensatory mitigation measures for these impacts be described in more detail. We understand that your office supports stream restoration at the wetland mitigation sites under consideration.

- More detail on stream impacts (including total stream length enclosed) will be provided in the Final EIS.

Mr. Kenneth A. Westlake  
October 4, 2012  
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- As noted above (under *Wetlands*), we will continue to coordinate mitigation approach/site selection with USEPA and the other resource agencies. Depending on the potential mitigation site(s) that are selected, mitigation for unvegetated waters of the U.S. could include strategies such as re-meandering channelized streams, removing/replacing existing drain tiles/culverts with stabilized stream channels, stabilizing eroded streambanks, constructing in-stream habitat, and creating riparian buffer.

Your office also mentioned that USEPA supports: (1) replacing culverts with three-sided natural bottom structures to re-establish a more natural watercourse under the roadway and (2) providing opportunities for stepped banking/ terrestrial wildlife passage.

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- Regarding the culverts, as previously mentioned, the proposed improvements consist of widening several existing roadways and extending several existing culverts along these roads (additional detail regarding specific stream crossings is also provided below). The culverts that will be extended are not proposed to be replaced, unless the culvert needs to be upgraded to meet drainage requirements. New culverts at waterways and/or wetlands will be designed to accommodate both anticipated high-water flows and low-water flows to minimize any negative effects to the aquatic ecosystem. Per the Illinois Tollway drainage design criteria, culverts are designed for the 50-year peak flow and checked for the 100-year and 500-year peak flows to avoid overtopping.
- As specified in subsection 3.21 (*Environmental Commitments*) of the Final EIS, the bottom of new box or pipe culverts will be buried below streambed elevations to maintain a more natural appearance, when feasible. Bottomless culverts will be considered in final design, when feasible, based on size of the span, cost, geometry, skew, and potential environmental impacts associated with its installation. Thus far, we already have identified one location where several three-sided box culverts are proposed near the Elgin-O'Hare Expressway/I-290 interchange. It is important to note that if a culvert is less than 48 inches wide (e.g., diameter), it is very difficult to place riverbed material within the entirety of the pipe.

Terrestrial wildlife crossings were considered for inclusion within riparian corridors/stream crossings and greenways. In general, the greenways and riparian corridors that cross the project corridor are located at the stream crossings (see Exhibit 3-20 in the Draft EIS). The summary below provides the determination to include or exclude wildlife crossings:

- Salt Creek will be bridged by the proposed Elgin-O'Hare Expressway, and will provide space for terrestrial wildlife crossings.

Mr. Kenneth A. Westlake  
October 4, 2012  
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- Existing Thorndale Avenue will be re-established as a frontage/service road that will flank the proposed Elgin-O'Hare Expressway; the bridge will remain in place and is not proposed to be modified. The existing bridge is approximately 134 feet wide and has stub abutments with slopedwall/riprap at Salt Creek. There is no shelf for terrestrial wildlife under the existing bridge and thus wildlife movement is limited in the existing condition. Wildlife access will be accommodated to the extent the existing bridge allows.
- There are no proposed improvements at the West Branch DuPage River, Spring Brook, or Silver Creek – therefore, no terrestrial wildlife crossings are proposed at these creeks as part of this project.
- At Meacham Creek, Addison Creek, and the Devon Avenue Tributary (at I-290) the existing box culverts are to remain in place. The culverts will be extended at one or both ends (depending on site conditions). Because the existing culverts are to remain in place, no additional terrestrial wildlife crossings are proposed at these creeks as part of this project.
- The proposed Willow Creek and Bensenville Ditch crossings are located immediately adjacent to, or are located on, existing O'Hare Airport property. In accordance with Federal Aviation Administration (FAA) policy, no terrestrial wildlife crossings are proposed at these creeks. In addition, there are existing upstream drainage structures at York Road, Canadian Pacific Railroad, and Union Pacific Railroad that are not included as part of this project. These upstream drainage structures may limit wildlife passage near the project corridor.
- Within the project corridor, Willow Creek South Tributary is located immediately adjacent to Thorndale Avenue and York Road in a heavily developed commercial/industrial area. The tributary is located just west of O'Hare Airport (and flows onto the airport property) and portions of the tributary are located within a Runway Protection Zone. A portion of the tributary will be slightly shifted as part of the improvements. Portions of wooded areas and other potential wildlife habitat that exist near this tributary will be displaced during construction. To meet FAA requirements, vegetation to be re-installed near the airport will consist of species that are unattractive to wildlife. For these reasons, no terrestrial wildlife crossing is proposed at this tributary.



Mr. Kenneth A. Westlake  
October 4, 2012  
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- Areas adjacent to the Higgins Creek crossings are primarily developed parcels with limited wildlife habitat. As part of final design, the need and potential for terrestrial wildlife crossings will be evaluated further at Higgins Creek (and its tributaries) where new culverts or bridges will be installed (at locations that are not immediately adjacent to, or on, O'Hare Airport property). Please note that under existing conditions, wildlife movement at Higgins Creek (at I-90) is limited by the existing bridge (that will remain under proposed conditions). At Touhy Avenue, the existing structure will also remain in place and no terrestrial wildlife crossing is proposed.

Your office requested additional information regarding mitigation for riparian impacts. Even though the existing habitats are low quality, your office stated that riparian functions need to be re-instated. Your office acknowledged the FAA wildlife attractant/safety requirements.

8

- Riparian mitigation has been considered in additional detail. Please note that disturbance of streamside/riparian vegetation will be kept to a minimum. Areas that are disturbed would be stabilized in accordance with NPDES and Clean Water Act Section 404 permit requirements. Tree/vegetation replacement will be guided by FAA, Tollway, and IDOT policies.
- Erosion controls, stormwater quality/quantity BMP (e.g., compensatory floodplain storage, bioswales, etc.), trees, shrubs, and other appropriate vegetation would be installed near streams to mitigate for riparian impacts. Coordination with the DuPage River Salt Creek Workgroup (DRSCW) will take place to investigate local sites within the Salt Creek Watershed that could provide additional riparian mitigation, if necessary.

It is important to note that the FAA is a signatory on the EIS and has a great deal of interest in protecting the traveling public through implementation of a variety of wildlife deterrents, including vegetation management techniques. The project must conform to an FAA wildlife hazard management advisory circular (*Hazardous Wildlife Attractants On or Near Airports*, AC No. 150/5200-33B, dated August 28, 2007) to protect the traveling public. FAA will dictate, to a large degree, what types of vegetation can be installed and where. Within the project corridor, FAA is unlikely to allow installation of vegetation that can be considered wildlife attractants that would put air travelers at risk.

Mr. Kenneth A. Westlake  
October 4, 2012  
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Stormwater Runoff

Your office recommended that the Final EIS include a conclusive discussion of which BMP will be used to manage/treat stormwater runoff and meet FAA safety requirements. Your office also noted that USEPA expects to participate in the development of the BMP plan.

- BMP have been an important topic of discussion with the regulatory agencies for the past year. The U.S. Army Corps of Engineers (USACOE), U.S. Fish and Wildlife Service (USFWS), and the USEPA have been unified in their objective for the EO-WB project to incorporate BMP that would enhance the water quality of storm runoff from the roadway pavements before reaching nearby receiving waters. The Draft EIS contains preliminary information pertaining to BMP in the form of exhibits showing the potential locations for BMP in the project corridor. IDOT and the regulatory agencies agreed that the Final EIS would advance the plan for BMP to a concept level showing the feasible locations and types of BMP that would provide effective management of the runoff and its quality. At the July 23, 2012 meeting, your office and other resource agencies (including the USACOE and USFWS) agreed, in principle, that that the BMP concept plan had sufficient detail for the Final EIS and that specific details would be coordinated during the Section 404 Clean Water Act permitting process.
- It is important to note that final details for BMP can only be determined at the time final site civil engineering is completed because they are mutually dependent. Interim engineering plans will be submitted to the USACE for review and approval prior to construction where resource impacts occur.

Mitigation of Impacts

Your office requested that further details be provided in subsequent NEPA documents matching mitigation measures with their associated impacts. Where possible, monitoring and maintenance measures that are expected to be taken should be identified.

- Mitigation that replaces environmental loss and serves to sustain the environment in the region has been the objective of the sponsoring agencies of the EO-WB project. IDOT will consider providing more detailed mitigation summary tables in subsequent NEPA documents.

IDOT and the Illinois Tollway will continue to coordinate with your office.

9

10

Mr. Kenneth A. Westlake  
October 4, 2012  
Page 8

If you have any questions or need additional information, please contact me or  
Ron Krall, Project Manager, at (847) 705-4103 or by e-mail at  
[ronald.krall@illinois.gov](mailto:ronald.krall@illinois.gov).

Very truly yours,

A handwritten signature in blue ink, appearing to read "John Fortmann".

John Fortmann, P.E.  
Acting Deputy Director of Highways,  
Region One Engineer

cc: Norm West, USEPA

α Ron Krall



REPLY TO  
ATTENTION OF:

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

BUREAU OF PROGRAMMING  
RECEIVED

JUL 02 2017

DISTRICT #1

Technical Services Division  
Regulatory Branch  
LRC-2007-802

SUBJECT: Response to the Draft EIS for the Elgin O'Hare West Bypass Project Located in Cook County, Illinois

Ron Krall  
Deputy Director of Highways, Region One Engineer  
Illinois Department of Transportation  
201 West Center Court  
Schaumburg, IL 60196

Dear Mr. Krall:

This is in regards to your request for comments on the Draft Environmental Impact Statement (DEIS) for the Elgin O'Hare West Bypass (EOWB) project. The Illinois Department of Transportation (IDOT), in consultation with the Federal Highway Administration (FHWA), has completed a DEIS which was sent to the NEPA 404 cooperating agencies for comment. Please reference the Corps comments below the quoted statement from the DEIS:

3.10, "Water Resources and Aquatic Habitats",

"The intent of the EO-WB project would be to maintain/improve the quality and quantity of aquatic resources identified in the plans, as applicable".

The Corps is in agreement that the integrity of the waterways and the improvement in water quality and quantity of remaining aquatic resources within the corridor is critical to the protection of the resources. The implementation of approved and viable Best Management Practices (BMP's) and the minimization of impacts to wetlands and waterways will help to facilitate this goal.

3.10.1.1, "Water Resources"

"Ten creeks and their tributaries, two lakes and 40 non-wetland ponds were identified in the vicinity of the project corridor. The INHS pre-determined that the non-wetland ponds are non-jurisdictional, with no further discussion of these areas offered in the Draft DEIS".

The wetland delineation should include site investigations for these areas, along with a formal jurisdictional determination completed by the Corps prior to submittal of the application (if

3 needed). If impacts to the ponds are being mitigated for under the State Interagency Wetland Policy Act, further discussion of the impacts and possible mitigation opportunities is warranted.

"Two lakes have been identified adjacent to the project corridor, with one being a Corps approved wetland mitigation project".

4 It is stated that in several portions of the DEIS the project corridor streams have no special designations with respect to function, value, or high quality and that the waterways are currently degraded in nature and water quality impairments from high levels of siltation, urban debris and chemical processes. Please be informed that BMP's to protect the existing mitigation sites, existing wetlands and waterways within and adjacent to the project corridor shall be required if the areas will be subject to additional surface water runoff.

3.10.2.1, Construction Impacts to Surface Waters"

5 "The existing channel between Thorndale Avenue and York Road would be filled and realigned.

In the event that any waterway is proposed to be realigned for construction of the project, the agencies shall be informed of such an activity prior to submittal of the permit application. Please be informed that the realignment of a creek and the extension and/or addition of a new box culvert in any waterway is considered impact and mitigation will be required.

3.10.2.2, "Operational Impacts to Surface Waters"

6 "Stormwater detention facilities would be constructed to compensate for the increased impervious surface. The detention facilities will follow Illinois Tollway and IDOT drainage requirements for highway systems (including consideration of local stormwater management ordinances)".

While the Corps recognizes the need to follow other design criteria, please be informed that there are specific design requirements for Corps approved BMP's that shall be considered when designing the stormwater facilities.

"With proper best management practices implementation, the project is not expected to exceed water quality standards for heavy metals".

7 Please keep in mind that appropriately designed BMPS for water quality may not be what is being proposed for agency review, due to the FAA requirements for wildlife controls taking precedent over other agency requirements.

8 "Under existing conditions, several best management practices area already in place along the project corridor west of IL 53, where Spring Brook, Meacham Creek, and West Branch Dupage River are located, so the anticipated change in stormwater quality is smaller for these streams".

Discuss the BMPS already existing within the project corridor and the efficiency and effectiveness of the facilities in treating additional pollutants from the project.

9

"Several waters are impaired for support of aquatic life. As a result, the dominant fish species are pollution tolerant, and potential impacts to fishing and other recreational surface water uses near the proposed improvements are anticipated to be minimal with implementation of BMP's".

This statement is being made in many sections of the Draft DEIS. Please keep in mind that appropriately designed BMPS for water quality are not being proposed to the agencies, and that FAA requirements for wildlife controls seem to be taking precedent over agency design requirements. The fact that the streams within the project corridor may already be impaired and that species utilizing the waterways may be more tolerant of contaminants does not take precedent over the installation and continued management of appropriately designed BMP's to protect the integrity of the existing aquatic systems.

3.10.3, "Measures to Minimize Harm and Mitigation"

10

"Final stabilization would follow the applicable Landscaping and Erosion Control Section of the IDOT and the Illinois Tollway standard specifications".

While the Corps does recognize the effectiveness of some of the soil erosion and sediment control (SESC) practices in the above-reference manuals, additional SESC measures will be required by the agencies for the stabilization of all disturbed and undeveloped areas, such as the planting of native species in lieu of typical upland landscape grasses.

11

"Mitigation for Permanent Fill placed in jurisdictional waters of the US would be accomplished in conjunction with wetland mitigation either through the purchase of wetland credits at an Corps approved mitigation bank or at an offsite mitigation location".

The Corps and other Federal agencies has determined that mitigation requirements for permanent impacts to Wetlands and Waters of the U.S. shall be satisfied at an offsite location in lieu of a mitigation bank. The mitigation requirements for the project will be in excess of 50 acres which should be compensated for under a single mitigation project and not subject to several different methods of mitigation. Mitigation accomplished at several locations is not a preferred method for large projects such as the O'Hare West Bypass. Mitigation to offset impacts to Waters of the US shall also include opportunities for stream restoration and enhancement which cannot be satisfied at a Corps approved mitigation bank since there are no banks within the District boundaries that offer this type of mitigation.

12

3.10.4 "Indirect and Cumulative Water Resource Impacts"

"More development through infilling and selective redevelopment is expected to occur in the vicinity of the project corridor over the next 30 years. Additional impervious surfaces may be constructed as part of the anticipated development. Areas that are unprotected open, underdeveloped, or underused space may be developed to take advantage of better transportation and access. These effects would be most noticeable in proximity to the proposed Elgin O'Hare and West Bypass corridors."

12 It is highly encouraged to require additional BMP's for further protection of wetlands and Waters of the US from anticipated future developmental impacts within the project corridor. Proposed BMP's could be oversized to allow for such development since all open space within the corridor is more than likely slated for future development.

3.12.2.1, "Floodplains"

13 The proposed corridor would involve a transverse encroachment of the Bensenville Ditch and Willow Creek where there is no encroachment in the existing condition. Longitudinal encroachments occur where the roadway runs parallel to the floodplain."

All longitudinal and transverse encroachments shall be considered impact and added to the total acreage requirement for mitigation.

3.12.3.1, O'Hare Airport and FAA Guidelines"

14 "On-stream incremental compensatory storage would be used to accommodate flood stage storage lost to roadway fill that would be placed in the floodplain. Combined with proposed detention sites, the creeks would be able to flow onto O'Hare Airport without increasing the flow rates or elevation of the water surface".

On-stream or on-line compensatory storage is generally not allowed under our permitting program. Alternative designs for providing compensatory storage off-line of jurisdictional waterways and wetlands shall be considered.

3.13.1, "Affected Environment"

15 "The INHS did not evaluate wetland area on airport property; however, wetland data from the OMP was used for these overlapping project areas. The West Bypass corridor includes approximately 0.3 acres of wetland area (as of early June 2010) within OMP limits. The OMP obtained a Section 404 CWA permit from the USACE in December 2005 for airport improvements.

The 0.3 acre impact was approved for the OMP project only and permitted to the City of Chicago. Please be informed that the wetland cannot be filled by another entity to facilitate another project's purpose.

3.13.2.1, "Acreage Impacts"

16 "The proposed project would impact up to 53 wetland sites (totaling approximately 24.4 acres) under the Build Alternative".

Please confirm whether the impacts of 24.4 acres also includes impacts to Waters of the U.S for road crossings, roadways, grading activities, stormwater facilities, etc.

17

"Wildlife Habitat", Two wetlands with high-quality wildlife habitat were identified by INHS within the project corridor at Sites 84 and 125. These wetland sites are relatively large marshes and the impact would be located at the perimeter of the wetland".

Due to the proposed impacts along the perimeter of the wetlands, buffers planted in native species and BMP's to intercept stormwater runoff from future development within the corridor is required.

18

"Stabilization of Streambanks and Shorelines", Streambank stabilization functions of the impacted wetlands will be compensated by vegetative and/or structural methods".

It is unclear as to what this statement is referring to. Any impacted streambank shall be regarded and revegetated with native species according to the Corps requirements.

19

#### 3.13.3.1, "Wetland Avoidance and Minimization of Impacts"

"Final avoidance and minimization factors will be reviewed either in the ROD or during the permitting process"

Please be informed that the Corps may require further avoidance and minimization of the impacts the event that all agency concerns have been adequately addressed prior to completion of the ROD. This could occur after submittal of the joint application form as well.

20

#### 3.13.3.2, "Wetland Compensation"

"IDOT and the Illinois Tollway have separate agreement with IDNR, which determine the mitigation ratios for each impact. The Illinois Tollway will be responsible for coordinating final ratios with IDNR prior to the permitting process. IDNR prefers that wetland mitigation for the project consider the use of existing wetland mitigation banks and/or the use of land that is either an unprotected natural area or open space not currently protected by a resource agency".

There seems to be conflicting mitigation requirements as required by the IDNR and by the Corps. The Illinois Tollway will need to coordinate with the two agencies for resolution of the final mitigation ratios for the impacts to wetlands. For example, the mitigation ratio for impacting a forested wetland under the Corps permitting program could be upwards of 15:1 in some instances vs. a mitigation ratio of 4:1 under the State Interagency Policy Act.

21


"To minimize agency concerns regarding mitigation, another concept that is being considered is "advanced mitigation".

Advanced mitigation is not an acceptable form of mitigation in the District. Restoration and/or enhancement work on wetland and Waters of the US that is completed in advance of a project being permitted will not be approved.



The District appreciates the opportunity to comment and looks forward to working with Federal and other lead agencies in completing the NEPA 404 review process for the project. If you have any questions, please contact Kathy Chernich, chief, East Section, Regulatory Branch by telephone at (312) 846-5531, or email at [kathy.g.chernich@usace.army.mil](mailto:kathy.g.chernich@usace.army.mil).

Sincerely,



Leesa A. Beal  
Chief, Regulatory Branch

Copy Furnished

U.S. Environmental Protection Agency (Norman West)  
U.S. Fish and Wildlife Service (Shawn Cirton)  
Federal Highway Administration (Stoner)



# Illinois Department of Transportation

Division of Highways/Region One / District One  
201 West Center Court/Schaumburg, Illinois 60196-1096

September 26, 2012

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

Re: Elgin O'Hare – West Bypass Project  
Response to comment on the Draft Environmental Impact Statement

Dear Ms. Beal:

Thank you for the comments provided by your office on the Elgin O'Hare – West Bypass (EOWB) Draft Environmental Impact Statement (EIS). Our responses to your comments are listed below.

Section 3.10: Water Resources and Aquatic Habitats

**Comment 1:** "The intent of the EO-WB [Elgin O'Hare – West Bypass] project would be to maintain/improve the quality and quantity of aquatic resources in the project corridor, as applicable."

The Corps is in agreement that the integrity of the waterways, the improvement in water quality and quantity of remaining aquatic resources within the corridor is critical to the protection of the resources. The implementation of approved and viable Best Management Practices (BMPs) and the minimization of impacts to wetlands and waterways will help to facilitate this goal.

**Response 1:** Noted. We will continue to work with your office on water quality/quantity BMPs. Additional wetland/waters avoidance/minimization strategies will be evaluated as engineering design progresses and as part of the Section 404 Clean Water Act permit process.

Section 3.10.1.1: Water Resources

**Comment 2:** "Ten creeks and their tributaries, two lakes and 40 non-wetland ponds were identified in the vicinity of the project corridor." The INHS [Illinois Natural History Survey] pre-determined that the non-wetland ponds are non-jurisdictional, with no further discussion of these areas offered in the Draft EIS.

The wetland delineation should include site investigations for these areas, along with a formal jurisdictional determination completed by the Corps prior to submittal of the application (if needed).

Ms. Beal  
September 26, 2012  
Page 2

2 | **Response 2:** INHS referenced the federal wetland delineation methodology (i.e., 1987 Delineation Manual and Regional Supplement) for the EO-WB project. The wetland delineation reports include data on soils, hydrology, and plant lists (including dominant vegetation). The wetland reports include data points in wetland areas, as well as non-wetland areas. Data points are provided for a number of non-wetland ponds in the wetland delineation reports.

As requested, the wetland and waters delineation reports were provided to your office for review in February 2011. To date, we have not received any comments. If a jurisdictional determination or field visit is required, we are available to arrange for a field visit with USACOE and INHS, as necessary.

3 | **Comment 3:** If impacts to the ponds are being mitigated for under the State Interagency Wetland Policy Act, further discussion of the impacts and possible mitigation opportunities is warranted.

**Response 3:** Wetland impacts (including wetland ponds) are being coordinated with the Illinois Department of Natural Resources (IDNR) and are discussed in Section 3.13 of the Draft EIS. Mitigation for non-wetland ponds is not required under the Interagency Wetland Policy Act.

**Comment 4:** "Two lakes have been identified adjacent to the project corridor, with one being a Corps approved wetland mitigation project."

4 | It is stated that in several portions of the Draft EIS the project corridor streams have no special designations with respect to function, value, or high quality and that the waterways are currently degraded in nature and water quality impairments from high levels of siltation, urban debris and chemical processes. Please be informed that BMPs, in order to protect the existing mitigation sites, existing wetlands and waterways within and adjacent to the project corridor, shall be required if the areas will be subject to additional surface water runoff.

**Response 4:** Noted. Soil erosion and sediment controls will be installed to protect wetland and waters during construction. Post construction water quality/quantity BMPs (including vegetative buffers) will also be provided to protect wetlands and waters (including existing mitigation sites) that are to remain within and adjacent to the project corridor from additional surface runoff. As engineering details/design progress, BMP development will continue to be coordinated with your office, Federal Aviation Administration (FAA), and other resource agencies. This issue was discussed in greater detail at our July 23, 2012 meeting.

Section 3.10.2.1: Construction Impacts to Surface Waters

**Comment 5:** "The existing channel between Thorndale Avenue and York Road would be filled and realigned."

In the event that any waterway is proposed to be realigned for construction of the project, the agencies shall be informed of such an activity prior to submittal of the permit application. Please be informed that the realignment of a creek and the extension and/or addition of a new box culvert in any waterway is considered impact and mitigation will be required.

5

**Response 5:** Within the project corridor, Willow Creek South Tributary is located immediately adjacent and parallel to the north side of Thorndale Avenue and the west side of York Road in a heavily developed commercial/industrial area. The tributary was relocated in the past and is located just west of O'Hare Airport (and flows east towards the airport) and portions of the tributary are located within a Runway Protection Zone (RPZ). The proposed impact to the tributary is associated with the construction of numerous ramps and other roadway improvements for the Elgin-O'Hare Expressway and West Bypass Corridors System Interchange. A portion of the tributary will be slightly shifted (closer to its original alignment) to accommodate the system interchange design. Additionally, the FAA has indicated that the portion of the tributary that is located within the RPZ should be placed within a culvert for the safety of the air traveling public.

More detail on stream impacts (including total stream length enclosed in culverts) will be provided in the Final EIS. We understand that any creek realignment and extension or addition of a new box culvert in any jurisdictional waterway is considered impact and mitigation will be required. Given that there are other culverts proposed to be constructed in jurisdictional waterways, an understanding of the mitigation required for each would be appreciated. Mitigation was discussed in additional detail at our July 23, 2012 meeting.

Section 3.10.2.2: Operational Impacts to Surface Waters

**Comment 6:** "Stormwater detention facilities would be constructed to compensate for the increased impervious surface. The detention facilities will follow Illinois Tollway and IDOT drainage requirements for highway systems (including consideration of local stormwater management ordinances)."

6

While the Corps recognizes the need to follow other design criteria, please be informed that there are specific design requirements for Corps approved BMPs, that shall be considered when designing the stormwater facilities.

**Response 6:** Noted. As engineering details/design progress, BMP development will continue to be coordinated with your office, the FAA, and other resource agencies. This issue was discussed in greater detail at the July 23, 2012, meeting with your office.

Ms. Beal  
 September 26, 2012  
 Page 4

6 | It is important to note that final details for BMPs can only be determined at the time final site civil engineering is advanced. Final grading and drainage plans will be submitted to the USACOE for review prior to construction.

**Comment 7:** "With proper BMP implementation, the project is not expected to exceed water quality standards for heavy metals."

Please keep in mind that appropriately designed BMPs for water quality may not be what is being proposed for agency review, due to the FAA requirements for wildlife controls taking precedent over other agency requirements.

7 | **Response 7:** We understand that criteria regarding BMP design will need to be finalized. BMP development will continue to be coordinated with your office, the FAA, and other resource agencies. This issue was discussed in greater detail at a recent meeting on July 23, 2012. At this meeting, the USACOE and other resource agencies (including the U.S. Environmental Protection Agency (USEPA), the U.S. Fish and Wildlife Service (USFWS), and the FAA) agreed, in principle, that that the BMP concept plan developed for the EO-WB had sufficient detail for the Final EIS and that specific details could be coordinated during the Section 404 Clean Water Act permitting process.

**Comment 8:** "Under existing conditions, several BMP are already in place along the project corridor west of IL Rte 53, where Spring Brook, Meacham Creek, and West Branch DuPage River are located, so the anticipated change in stormwater quality is smaller for these streams."

8 | Discuss the BMPs already existing within the project corridor, and the efficiency and effectiveness of the facilities in treating additional pollutants from the project.

**Response 8:** The existing BMPs west of IL Rte 53 have been included in the BMP evaluation. The BMP evaluation was discussed at our July 23, 2012 meeting. To the extent practical, additional information regarding BMPs will be included in the Final EIS.

**Comment 9:** "Several waters are impaired for support of aquatic life. As a result, the dominant fish species are pollution tolerant, and potential impacts to fishing and other recreational surface water uses near the proposed improvements are anticipated to be minimal with implementation of BMPs."

9 | This statement is being made in many sections of the Draft EIS. Please keep in mind that appropriately designed BMPs for water quality are not being proposed to the agencies, and that FAA requirements for wildlife controls seem to be taking precedent over agency design requirements. The fact that the streams within the project corridor may already be impaired, and that species utilizing the waterways may be more tolerant of contaminants, does not take precedent over the installation and continued management of appropriately designed BMPs, in order to protect the integrity of the existing aquatic systems.

Ms. Beal  
 September 26, 2012  
 Page 5

9 | **Response 9:** Noted. We appreciate the input that your office has provided to date regarding BMPs, and understand that water quality is an important concern for the project corridor subwatersheds. As engineering details/design progress, BMP development will continue to be coordinated with your office, the FAA, and other resource agencies.

| *Section 3.10.3: Measures to Minimize Harm and Mitigation*

| **Comment 10:** "Final stabilization would follow the applicable Landscaping and Erosion Control Section of the IDOT and the Illinois Tollway standard specifications."

10 | While the Corps does recognize the effectiveness of some of the soil erosion and sediment control (SESC) practices in the above-referenced manuals, additional SESC measures will be required by the agencies for the stabilization of all disturbed and undeveloped areas, such as the planting of native species in lieu of typical upland landscape grasses.

| **Response 10:** Noted. Proposed SESC practices will be designed in accordance with National Pollutant Discharge Elimination System (NPDES) requirements and will be reviewed as part of the Section 404 Clean Water Act permit process. Plant species listed in the *O'Hare Modernization Program Master Specifications*, "Section 02905: Sustainable Airport Landscaping," will also be considered when designing seed mixes to address FAA wildlife hazard safety requirements. This plant list includes several native species and was previously provided to your office for review.

| **Comment 11:** "Mitigation for Permanent Fill placed in jurisdictional waters of the U.S. would be accomplished in conjunction with wetland mitigation either through the purchase of wetland credits at a Corps approved mitigation bank or at an offsite mitigation location."

11 | The Corps and other Federal agencies have determined that mitigation requirements for permanent impacts to wetlands and waters of the U.S. shall be satisfied at an offsite location in lieu of a mitigation bank. The mitigation requirements for the project will be in excess of 50 acres, which should be compensated for under a single mitigation project and not subject to several different methods of mitigation. Mitigation accomplished at several locations is not a preferred method for large projects such as the O'Hare West Bypass.

| Mitigation to offset impacts to waters of the U.S. shall also include opportunities for stream restoration and enhancement, which cannot be satisfied at a Corps approved mitigation bank since there are no banks within the District boundaries that offer this type of mitigation.

Ms. Beal  
 September 26, 2012  
 Page 6

11

**Response 11:** Noted. Information on several potential wetland and waters mitigation sites (offsite, but within the Des Plaines River watershed) was previously provided to your office. Your office provided preliminary comments and requested additional information on three sites. As of receipt of this letter, this additional information has been or will soon be provided to your office.

Mitigation site selection will continue to be coordinated with your office (and the other resource agencies). Although we may refine the list of potential mitigation sites and continue to discuss options prior to Section 404 Clean Water Act permitting, a final decision regarding wetland mitigation site selection is anticipated to take place during the permitting process.

*Section 3.10.4: Indirect and Cumulative Water Resource Impacts*

**Comment 12:** "More development through infilling and selective redevelopment is expected to occur in the vicinity of the project corridor over the next 30 years. Additional impervious surfaces may be constructed as part of the anticipated development. Areas that are unprotected open, underdeveloped, or underused space may be developed to take advantage of better transportation and access. These effects would be most noticeable in proximity to the proposed Elgin O'Hare and West Bypass corridors."

It is highly encouraged to require additional BMPs for further protection of wetlands and waters of the U.S. from anticipated future developmental impacts within the project corridor. Proposed BMPs could be oversized to allow for such development since all open space within the corridor is more than likely slated for future development.

12

**Response 12:** Based on our current BMP plan, we anticipate a surplus in capacity of water quality runoff storage volume for a significant number of local storm events. This issue was discussed in greater detail at our July 23, 2012 meeting.

In addition, the proposed EOWB project is located in DuPage and Cook Counties. Both Counties have (or are preparing) stormwater management and BMP requirements/ordinances for treating runoff generated from proposed development. Therefore, the majority of off-site, future development adjacent to the proposed EOWB improvements will be subject to implementing BMP programs for their individual developments in accordance with the applicable ordinance.

The DuPage County Countywide Stormwater and Flood Plain Ordinance includes requirements to implement BMPs and to manage the effects of urbanization on stormwater drainage; preserving/enhancing existing wetlands, buffers, and aquatic environments; preventing further degradation of surface water quality; incorporating water quality and habitat protection measures in all stormwater management activities; and encouraging control of stormwater quality/quantity at the most site-specific or local level.

Ms. Beal  
 September 26, 2012  
 Page 7

12 The goal of the pending Cook County Watershed Management Ordinance (WMO) is to establish uniform, minimum, countywide stormwater management regulations for Cook County. Components that may be regulated under the pending WMO include drainage and detention, floodplain management, wetland protection, stream habitat and riparian environment protection, SESC, and water quality.

Both ordinances are expected to provide additional protection to the preserved wetlands and waters of the U.S. from anticipated future developmental impacts near the project corridor – even without oversized BMPs within the EO-WB project corridor.

Section 3.12.2.1: Floodplains

**Comment 13:** “The proposed corridor would involve a transverse encroachment of the Bensenville Ditch and Willow Creek where, there is no encroachment in the existing condition. Longitudinal encroachments occur where the roadway runs parallel to the floodplain.”

All longitudinal and transverse encroachments shall be considered an impact and added to the total acreage requirement for mitigation.

13 **Response 13:** Compensatory storage will be provided for all fill in regulatory floodplains at 1.5:1 ratio according to the DuPage County Countywide Stormwater and Flood Plain Ordinance. In addition, we understand that fill placed within jurisdictional waters or wetlands will be considered an impact that will require mitigation.

Information on several potential wetland/waters mitigation sites has previously been provided to your office for review and comment. A project mitigation approach and site selection will continue to be coordinated with your office, as well as other resource agencies. Depending on the potential mitigation sites, mitigation for unvegetated waters may include re-meandering channelized streams, removing/replacing existing drain tiles/culverts with stabilized stream channels, stabilizing eroded streambanks, constructing in-stream habitat, creating riparian buffer, etc. (or a combination of these methods). Mitigation sites will comply with FAA wildlife hazard safety requirements.

Section 3.12.3.1: O'Hare Airport and FAA Guidelines

14 **Comment 14:** “On-stream incremental compensatory storage would be used to accommodate flood stage storage lost to roadway fill that would be placed in the floodplain. Combined with proposed detention sites, the creeks would be able to flow onto O'Hare Airport without increasing the flow rates or elevation of the water surface.”



On-stream or on-line compensatory storage is generally not allowed under our permitting program. Alternative designs for providing compensatory storage off-line of jurisdictional waterways and wetlands shall be considered.

14

**Response 14:** In the Draft EIS, "on-stream" is intended to mean "adjacent to the stream." An exhibit depicting potential compensatory storage sites was previously provided to your office. Compensatory storage is not proposed within streams.

As previously stated, Willow Creek South Tributary would be slightly shifted as part of the proposed improvements. The proposed creek shift would be placed within a proposed compensatory storage area. A grading plan (showing proposed compensatory storage areas) and all proposed impacts to project corridor streams will be submitted to your office for review as part of the Section 404 Clean Water Act permit application.

Section 3.13.1: Affected Environment

15

**Comment 15:** "The INHS did not evaluate wetland area on airport property; however, wetland data from the OMP [O'Hare Modernization Program] was used for these overlapping project areas. The West Bypass corridor includes approximately 0.3 acres of wetland area (as of early June 2010) within OMP limits. The OMP obtained a Section 404 CWA permit from the USACOE in December 2005 for airport improvements."

The 0.3 acre impact was approved for the OMP project only and permitted to the City of Chicago. Please be informed that the wetland cannot be filled by another entity to facilitate another project's purpose.

**Response 15:** Noted. We anticipate that the wetlands at O'Hare Airport will be filled as part of OMP in accordance with the City of Chicago Section 404 Permit prior to December 15, 2015.

Section 3.13.2.1: Acreage Impacts

16

**Comment 16:** "The proposed project would impact up to 53 wetland sites (totaling approximately 24.4 acres) under the Build Alternative."

Please confirm whether the impacts of 24.4 acres also include impacts to waters of the U.S. for road crossings, roadways, grading activities, stormwater facilities, etc.

**Response 16:** Based on further plan refinements, potential wetland impacts have been reduced to a total of 23.0 acres. A total of 2.45 acres of impact to unvegetated waters of the U.S. would be in addition to the 23.0 acres of potential wetland impact. The impacts are based on preliminary engineering and include those necessary for road crossings, roadways, grading activities, and stormwater management facilities.

- 17 **Comment 17:** "Wildlife Habitat. Two wetlands with high-quality wildlife habitat were identified by INHS within the project corridor at Sites 84 and 125. These wetland sites are relatively large marshes and the impact would be located at the perimeter of the wetland."
- Due to the proposed impacts along the perimeter of the wetlands, buffers planted in native species and BMPs to intercept stormwater runoff from future development within the corridor is required.
- Response 17:** Noted. To the extent practicable, BMPs and a wetland buffer will be incorporated into the plan near wetland Sites 84 and 125. Native plant species that meet FAA wildlife hazard safety requirements will be considered when designing seed mixes for the wetland buffers. As engineering details/design progress, BMP development will continue to be coordinated with your office, the FAA, and other resource agencies. This issue was discussed in greater detail at our July 23, 2012 meeting.
- 18 **Comment 18:** "Stabilization of Streambanks and Shorelines. Streambank stabilization functions of the impacted wetlands will be compensated by vegetative and/or structural methods."
- It is unclear as to what this statement is referring to. Any impacted streambank shall be regraded and revegetated with native species according to the Corps requirements.
- Response 18:** Noted. Proposed grading and erosion controls (including stream protection) will be reviewed as part of the Section 404 Clean Water Act permit process. The SESC practices will be designed in accordance with IDOT/Illinois Tollway and NPDES requirements. Plant species listed in the *O'Hare Modernization Program Master Specifications*, "Section 02905: Sustainable Airport Landscaping," will also be considered when designing seed mixes to address FAA wildlife hazard safety requirements. This plant list includes several native species and was previously provided to your office for review.
- Section 3.13.3.1: Wetland Avoidance and Minimization of Impacts*
- 19 **Comment 19:** "Final avoidance and minimization factors will be reviewed either in the ROD or during the permitting process."
- Please be informed that the Corps may require further avoidance and minimization of the impacts in the event that all agency concerns have been adequately addressed prior to completion of the R.O.D. [Record of Decision]. This could occur after submittal of the joint application form as well.
- Response 19:** Noted. Additional wetland avoidance/minimization strategies will be evaluated as engineering design progresses prior to issuance of the R.O.D. or as part of the Section 404 Clean Water Act permit process.

Section 3.13.3.2: Wetland Compensation

**Comment 20:** "IDOT and the Illinois Tollway have separate agreements with IDNR, which determine the mitigation ratios for each impact. The Illinois Tollway will be responsible for coordinating final ratios with IDNR prior to the permitting process. IDNR prefers that wetland mitigation for the project consider the use of existing wetland mitigation banks and/or the use of land that is either an unprotected natural area or open space not currently protected by a resource agency."

20

There seems to be conflicting mitigation requirements as required by the IDNR and by the Corps. The Illinois Tollway will need to coordinate with the two agencies for resolution of the final mitigation ratios for the impacts to wetlands. For example, the mitigation ratio for impacting a forested wetland under the Corps permitting program could be upwards of 15:1 in some instances vs. a mitigation ratio of 4:1 under the State Interagency Policy Act.

**Response 20:** Noted. Wetland mitigation sites and final compensation ratios will be coordinated with the IDNR under the 1989 Interagency Wetlands Policy Act and with the USACOE under Section 404 of the Clean Water Act.

Please note that the wooded wetlands (referred to as forested depressions by INHS) that are currently proposed to be impacted, do not appear to meet the definition of a high quality aquatic resource. The wooded wetlands have low floristic qualities (FQI and C-value) that do not meet the high quality aquatic resource criteria specified in the re-issued Regional Permit Program. The wooded wetlands are dominated by common, weedy, pioneer species, such as silver maple (*Acer saccharinum*), eastern cottonwood (*Populus deltoides*), box elder (*Acer negundo*), and green ash (*Fraxinus pennsylvanica sub.*). These wetlands are not dominated by oaks (*Quercus spp.*) or other native trees listed in the description of a high quality forested wetland found in Appendix A of the Regional Permit Program.

21

**Comment 21:** "To minimize agency concerns regarding mitigation, another concept that is being considered is 'advanced mitigation'."

Advanced mitigation is not an acceptable form of mitigation in the District. Restoration, and/or enhancement work on wetland and waters of the U.S. that is completed in advance of a project being permitted will not be approved.

**Response 21:** Noted. Information on several potential wetland mitigation sites was previously provided to your office for review and comment. Mitigation site selection will continue to be coordinated with your office.

We, look forward to continued coordination and dialogue with your office on this important project.

Ms. Beal  
September 26, 2012  
Page 11

If you have any questions or need additional information, please contact me or Ron Krall, Project Manager, at (847) 705-4103 or by e-mail at [ronald.krall@illinois.gov](mailto:ronald.krall@illinois.gov).

Very truly yours,

A handwritten signature in black ink, appearing to read "John Fortmann". The signature is fluid and cursive, with a large initial "J" and "F".

John Fortmann, P.E.  
Acting Deputy Director of Highways,  
Region One Engineer

cc: Kathy Chernich, USACOE



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

PAT QUINN, GOVERNOR

JOHN J. KIM, INTERIM DIRECTOR

217-782-0547

RECEIVED  
APR 13 2012

Ms. Diane M. O'Keefe, P.E.  
Deputy Director of Highways  
Illinois Department of Transportation  
Division of Highways/Region One/District One  
201 West Center Court  
Schaumburg, IL 60196-1096

DIST. ONE - DESIGN

RE: Tier Two Elgin O'Hare – West Bypass project Draft Environmental Impact Statement

Dear Ms. O'Keefe:

Thank you for the opportunity to review the draft Environmental Impact Statement for the Tier Two Elgin O'Hare West Bypass project.

1 The Agency has no objections to the project; however a construction permit may be required from the Division of Public Water Supplies if the project involves the relocation of any water mains. Also, if one or more acres are disturbed during construction, a construction site activity stormwater NPDES permit will be required from the Division of Water Pollution Control. You may contact Al Keller, 217-782-0610, with questions.

2 The Bureau of Air has no objections; however asbestos and lead paint should be addressed before actual repairs are performed to ensure proper abatement is done if needed. If abatement is needed, notification will be required 10 working days prior to the project start date. Contact Alan Grimmett for all questions on this matter at 217-557-1438.

Solid and hazardous waste must be properly disposed of or recycled.

Sincerely,

Lisa Bonnett  
Deputy Director



# Illinois Department of Transportation

Division of Highways/Region One / District One  
201 West Center Court/Schaumburg, Illinois 60196-1096

August 31, 2012

Ms. Lisa Bonnett  
Illinois Environmental Protection Agency  
1021 N. Grand Avenue East  
P.O. Box 19276  
Springfield, IL 62794

Re: Elgin O'Hare – West Bypass Project  
Response to comment on the Draft Environmental Impact Statement

Dear Ms. Bonnett:

Thank you for the comment you provided on the Elgin O'Hare - West Bypass Draft Environmental Impact Statement (EIS). We appreciate your support of the project, and the working relationship that has spanned the entire process.

1 & 2

The Illinois Department of Transportation (IDOT) appreciates IEPA's reference to the potential need for construction permits for the relocation of water mains, stormwater discharge permits, and management of special wastes. Coordination with IEPA will be arranged by the implementing agency (Illinois Tollway) to satisfy these regulatory matters.

The Tier Two Final Environmental Impact Statement (EIS) is expected to be distributed later this year, and will incorporate public and agency comments received on the Tier Two Draft EIS. As the project advances, IDOT and the Illinois Tollway will continue to coordinate with those affected by the project.

If you have any questions or need additional information, please contact me or Ron Krall, Project Manager, at (847) 705- 4103 or by e-mail at [ronald.krall@illinois.gov](mailto:ronald.krall@illinois.gov).

Very truly yours,

John Fortmann, P.E.  
Acting Deputy Director of Highways,  
Region One Engineer



Robert F. Flider, Acting Director

**Bureau of Land and Water Resources**

State Fairgrounds • P.O. Box 19281 • Springfield, IL 62794-9281 • 217/782-6297 • TDD 217/524-6858 • Fax 217/557-0993

April 16, 2012

BUREAU OF PROGRAMMING  
RECEIVED

Ms. Diane O'Keefe, P.E.  
Deputy Director of Highways  
Division of Highways/District One  
201 West Center Court  
Schaumburg, Illinois 609196-1096

APR 18 2012

DISTRICT #1

Re: Tier Two Draft Environmental Impact Statement (EIS)  
for the Elgin O'Hare-West Bypass (EO-WB)  
Cook and DuPage Counties, Illinois  
Federal Highway Administration, Illinois Department of Transportation, Federal Aviation  
Administration

Dear Ms. O'Keefe:

The Illinois Department of Agriculture (IDOA) has completed its review of the agricultural impacts associated with the Tier Two Elgin O'Hare-West Bypass (EO-WB) Draft Environmental Impact Statement. The project was examined for its compliance with IDOT's Agricultural Land Preservation Policy as well as Illinois' Farmland Preservation Act (505 ILCS 75/1 et seq.).

The EO-WB project is planned as a toll road with ±25 miles of mainline improvements and about 16 miles of supporting arterial improvements. It is a multimodal transportation improvement that would relieve local congestion, improve efficiency by reducing the number of partial interchanges and at-grade railroad crossings, improve access to existing and planned land uses, and enhance planned O'Hare Airport improvements.

These improvements respond to the needs of an area that are uniquely characterized and an important transportation node in the metropolitan area of Cook and DuPage counties. The area is further defined by extensive commercial and industrial development along with O'Hare Airport.

Because all roadway improvements will occur in areas designated for highly urbanized use and agricultural land is not involved in its development, the project is exempt from further review in accordance with Section 2.c of the IDOA-IDOT Cooperative Working Agreement on the protection of Illinois farmland.

The IDOA has determined that the project complies with the Illinois' Farmland Preservation Act.

Sincerely,

Steven D. Chard, Acting Chief  
Bureau of Land and Water Resources

SDC:TS

cc: Agency project file



# Illinois Department of Transportation

Division of Highways/Region One / District One  
201 West Center Court/Schaumburg, Illinois 60196-1096

August 23, 2012

Mr. Steven Chard, Acting Chief  
Illinois Department of Agriculture  
State Fairgrounds  
P.O. Box 19281  
Springfield, IL 62794-9281

Re: Elgin O'Hare – West Bypass Project  
Response to comment on the Draft Environmental Impact Statement

Dear Mr. Chard:

1 | Thank you for your comment on the Draft Environmental Impact Statement (EIS). We acknowledge that the project is exempt from further review under the IDOA-IDOT Cooperative Working Agreement and complies with the Illinois Farmland Preservation Act.

The Tier Two Final EIS is expected to be distributed later this year, and will incorporate public and agency comments received on the Tier Two Draft EIS. As the project advances, Illinois Department of Transportation and the Illinois Tollway will continue to coordinate with those affected by the project.

If you have any questions or need additional information, please contact me or Ron Krall, Project Manager, at (847) 705-4103 or by e-mail at [ronald.krall@illinois.gov](mailto:ronald.krall@illinois.gov).

Very truly yours,

John Fortmann, P.E.  
Acting Deputy Director of Highways,  
Region One Engineer





# Illinois Department of Natural Resources

One Natural Resources Way Springfield, Illinois 62702-1271  
<http://dnr.state.il.us>

Pat Quinn, Governor

Marc Miller, Acting Director

April 18, 2012

Mr. Ron Krall  
 Illinois Department of Transportation  
 Bureau of Programming  
 201 W. Center  
 Schaumburg, Illinois 60196

RE: Elgin O'Hare—West  
 ByPass—Tier Two  
 Draft EIS

Dear Mr. Krall:

This letter is in response to the above referenced project that was reviewed for natural resource impacts and offer the following comments.

The Illinois Department of Natural Resources (IDNR) concurs with the findings in the DEIS concerning impacts to state threatened and endangered species and wetlands. Following the policy of avoiding and minimizing impacts as the project progresses is being implemented.

1 | As noted there, are no T&E species identified in the most current review. These reviews are good for a two year time period, at which time the project should be resubmitted for any changes that may occur on the landscape.

2 | Compliance with the 1989 Interagency Wetlands Policy Act is being followed with applicable ratios being applied as the project progresses in the design phase and minimizing impacts are being studied. Mitigation at one or several wetland mitigation banks are being investigated and will include IDNR when this issue is being finalized.

If you have any questions on the above, please contact me at 217-785-4862.

Sincerely,

Steve Hamer  
 Transportation Review Program  
 Division of Environment and Ecosystems

file

BUREAU OF PROGRAMMING  
 RECEIVED

APR 30 2012  
 DISTRICT #1



# Illinois Department of Transportation

Division of Highways/Region One / District One  
201 West Center Court/Schaumburg, Illinois 60196-1096

September 24, 2012

Mr. Steve Hamer  
Illinois Department of Natural Resources  
One Natural Resources Way  
Springfield, IL 62702

Re: Elgin O'Hare – West Bypass Project  
Response to comment on the Draft Environmental Impact Statement

Dear Mr. Hamer:

Thank you for your comments regarding the Elgin O'Hare – West Bypass Draft Environmental Impact Statement (EIS). We offer the following response.

1 We understand from your comment that adverse effects to state-listed threatened and endangered species are unlikely as a result of the project, and that the IDNR threatened and endangered species review is valid for a two-year time period, at which time the project should be re-submitted for an updated review.

2 Regarding compliance with the 1989 Interagency Wetlands Policy Act, as this project progresses, potential wetland impacts, compensation ratios, and mitigation sites will continue to be coordinated with your office. Information regarding several potential wetland mitigation sites was previously provided to your office for review and comment. The project mitigation approach/site selection will continue to be coordinated with your office prior to release of the Final EIS. The location of compensatory wetland mitigation will be finalized following a state/federal resource agency determination on the wetland replacement ratios and other mitigation objectives.

IDOT and the Illinois Tollway will continue to coordinate this project with your office as it continues to move forward.

If you have any questions or need additional information, please contact Ron Krall, Project Manager, at (847) 705-4103 or by e-mail at [ronald.krall@illinois.gov](mailto:ronald.krall@illinois.gov).

Very truly yours,

John Fortmann, P.E.  
Acting Deputy Director of Highways,  
Region One Engineer

Mayor  
CRAIG B. JOHNSON

Village Clerk  
JUDITH M. KEEGAN

Village Manager  
RAYMOND R. RUMMEL



Village Trustees  
NANCY J. CZARNIK  
PATTON L. FEICHTER  
JEFFREY C. FRANKE  
SAMUEL L. LISSNER  
JAMES P. PETRI  
CHRIS PROCHNO

May 10, 2012

Ms. Diane M. O'Keefe, P.E.  
Deputy Director of Highways  
Region One Engineer  
Illinois Department of Transportation  
201 West Center Court  
Schaumburg, Illinois 60196-1096

SUBJECT: ELGIN O'HARE WEST BYPASS PROJECT  
DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Ms. O'Keefe:

The development of the full build plan for the Elgin O'Hare West Bypass project has truly been a unique partnership between the State and local agencies. I would like to commend you and your staff in their efforts in collaboratively working with the Village to create an improvement plan which would have served both local and regional transportation needs. While the full build design meet the needs of the region, the Village has several concerns regarding the implementation of the interim plan as proposed by the Illinois Toll Highway Authority.

The Village staff submitted our review comments on the interim and full build out plans in April 2012. To date only several of our design concerns have been addressed. The Village recognizes the complexity of financing and constructing a project of such regional and national significance. However, we feel that several key design elements must be addressed prior to issuance of a Record of Decision for the project.

The following is a summary of design concerns which have been addressed:

- Elmhurst Road Interchange at Interstate 290 – The Village concurs with the recommended diverging diamond design for the interchange with the understanding the design will provide flexibility for future interchange modifications if needed.
- Illinois Route 83 Interchange – The turn bay storage on Illinois Route 83 will be designed to accommodate interim (2022) traffic volumes.
- Devon Avenue over Interstate 290 – The reconstructed bridge over Interstate 290 will be designed to accommodate a potential six lane cross section on Devon Avenue.



- Elmhurst Road Devon Avenue to Higgins Road – The Village does not agree with the State conclusion that interim traffic volumes do not warrant a six lane cross section. However, the Village will defer to the State’s decision at this time and will work with the State to identify potential funding sources for future improvements to this route.

The Elgin O’Hare West Bypass construction is unique in that it will replace an existing regional arterial highway. As such, it is of the utmost importance to Elk Grove Village and our neighboring communities to preserve local access. The following key design elements have not been addressed to date and must be resolved prior to issuance of a Record of Decision:

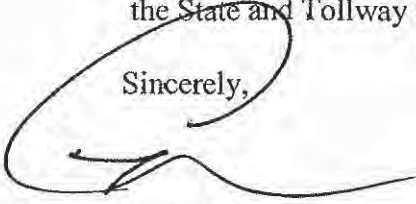
- 1 • Frontage Roads Illinois Route 83 to Elmhurst Road – The proposed design should be modified to provide continuous frontage roads on both the north and south side of the Elgin O’Hare. Coordination with the Illinois Commerce Commission and the jurisdictional agency for the frontage roads must be completed to ensure the implementation of this plan.
- 2 • Interstate 290 Frontage Road Ramps – The free movement of regional traffic seeking access to local businesses from Interstate 290 is a critical need for the continued success of local businesses. The tolling of the frontage roads for motorists traveling on the Interstate 290 freeway will cause significant diversion onto the local arterial system.
- 3 • Illinois Route 72 and Elmhurst Road Intersection: - The interim construction plan will place a significant traffic burden on this intersection for greater than a 10 year period. The Village proposes the construction of a continuous flow intersection concept utilizing the Old Higgins Road alignment option developed by the State.
- 4 • Groot Industries Right-of-Way Acquisition – The Village opposes the proposed access onto Coyle Lane. The proposed access would result in the acquisition of two businesses and would place an unacceptable burden on our local street system.

The collaborative efforts between the State, Tollway and local agencies have created an excellent platform for the implementation of this much needed regional transportation improvement. I trust that these remaining design elements can be readily addressed in order that the project may move forward with the enthusiastic support of the Village.

Thank you for your assistance with these items. Village staff would be available to meet with

the State and Tollway to resolve these concerns at your earliest convenience.

Sincerely,



Craig B. Johnson  
Mayor

- C: Board of Trustees
- Village Manager
- Director of Public Works
- Kristi LaFleur, Tollway Executive Director
- Ronald Krall



# Illinois Department of Transportation

Division of Highways/Region One / District One  
201 West Center Court/Schaumburg, Illinois 60196-1096

October 17, 2012

The Honorable Craig Johnson  
Mayor  
Elk Grove Village  
901 Wellington Avenue  
Elk Grove Village, IL 60007

Re: Elgin O'Hare – West Bypass Project  
Draft Environmental Impact Statement Comments

Dear Mayor Johnson:

We are writing in response to your May 10, 2012 letter summarizing the Village's remaining design concerns related to the Elgin O'Hare – West Bypass (EO-WB) project's Draft Environmental Impact Statement (EIS).

Based upon a number of coordination meetings with the Village since receiving your May 10<sup>th</sup> letter, we believe that all of the design issues have been satisfactorily addressed. The following is a summary of the status of the points noted in your letter:

- 1 | • **Frontage Road:** The design has been modified to create a more continuous system, and coordination with the Illinois Commerce Commission will be pursued, as well as discussions regarding jurisdiction of the frontage roads.
- 2 | • **Tolling:** A tolling scenario will be developed for the project during the final design, and stakeholder input will be considered as part of that process.
- 3 | • **IL Rte 72/Elmhurst Rd intersection:** The "Old Higgins" quadrant bypass option has been selected as the preferred solution at this location.
- 4 | • **Groot Industries:** We acknowledge your concerns about the access to Coyle and will continue to work toward an agreeable solution.

IDOT, in coordination with the Illinois Tollway, is moving forward with finalizing preliminary engineering studies and preparing the Tier Two Final EIS. The Illinois Tollway will work collaboratively with the Village and others to successfully advance implementation of the EO-WB project.

The Honorable Craig Johnson  
October 17, 2012  
Page 2

If you have any questions or need additional information, please contact me or Ron Krall, Project Manager, at (847) 705-4103 or by e-mail at [ronald.krall@illinois.gov](mailto:ronald.krall@illinois.gov).

Very truly yours,



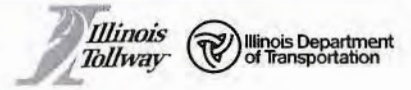
John Fortmann, P.E.  
Acting Deputy Director of Highways,  
Region One Engineer

cc: Matt Roan

# COMMENT FORM



Do you have comments?  
Please fill out this sheet and mail it back to us by May 14, 2012.



1

1. Eastbound EO to York Rd. Circuitous Route

Exit west of Rte. 83 turn north (left) at signal, go under EO, turn east (right) at signal, go two blocks to Supreme Drive turn south (right) at signal and go back under the EO again to the signal at the frontage road turn east (left) and continue to York Road!

This is different than we saw before; there will be a large volume of drivers doing this

2

2. Frontage road and access to Sivert Ct.

could it be slightly realigned to "save" the Peterbilt business at 140-142 Thorndike?

3

3. East Green Street

It appears to have a non-mountable median that would block left turn movements to and from Podlin Avenue and Domenic Court.

There should be a break.

Two 'staff' at the Open House gave me two different answers on this question.

I (do  do not ) desire a response.

Would you like your name added to our project mailing list?

Yes  No

Name: SCOTT R. VIGER

Address: Village of Bensenville  
12 S. Center St  
Bensenville, IL 60106

Phone: 630-350-3411





# Illinois Department of Transportation

Division of Highways/Region One / District One  
201 West Center Court/Schaumburg, Illinois 60196-1096

Project and Environmental Studies  
Elgin O'Hare – West Bypass  
Cook and DuPage Counties

August 31, 2012

Mr. Scott Viger  
Director of Community Development  
Village of Bensenville  
12 S. Center Street  
Bensenville, IL 60106

Re: Elgin O'Hare – West Bypass Project  
Response to comment provided during the public comment period

Dear Mr. Viger:

Thank you for the comment you provided during the public comment period.

1 | In your comment, you expressed concern regarding the proposed design of the frontage road between IL 83 and Supreme Drive. This section of frontage road has been redesigned as a continuous frontage road between IL 83 and York Road, where the section between IL 83 and Supreme Drive is one-way eastbound, and the remaining section to York Road is two-way travel. The revised design is contingent upon the Illinois Commerce Commission's (ICC) approval of an at-grade railroad crossing on the proposed frontage road east of Illinois Route 83.

2 | In reference to your question about realigning the frontage road and access to Sivert Court for the purpose of avoiding Peterbilt located on Thorndale Avenue, we offer the following. Alternatives for avoiding impact to the business were evaluated, but unfortunately none were found practicable. The frontage road is optimally located to provide the proper curve for the roadway and accommodate drainage. Its location is also constrained by the potential future bus rapid transit line under York Road north of the proposed frontage road intersection. The realigned access to Sivert Court could be relocated to avoid the building, but the frontage road would still cause it to be displaced.

3 | Lastly, you expressed interest in the provision of a mountable median on East Green Street that allows left turning movements to and from Podlin Avenue and Domenic Court. A barrier median will extend from County Line Road to Taft Road to minimize turning movements and cross access. With interchanges at both County Line Road and Taft Road, traffic movement along this section of Green Street cannot be comprised; therefore, a barrier is planned. At Podlin Avenue and Domenic Court right-in and right-out movements will be permitted.

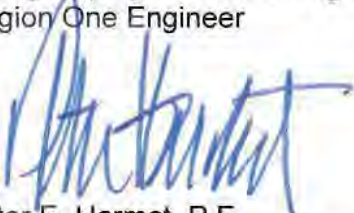
Mr. Scott Viger  
August 31, 2012  
Page 2

The Tier Two Final EIS is expected to be distributed later this year, and will incorporate public and agency comments received on the Tier Two Draft EIS. As the project advances, the Illinois Department of Transportation (IDOT) and the Illinois Tollway will continue to coordinate with those affected by the project.

If you have any questions or need additional information, please contact Ron Krall, Project Manager, at (847) 705- 4103 or by e-mail at [ronald.krall@illinois.gov](mailto:ronald.krall@illinois.gov).

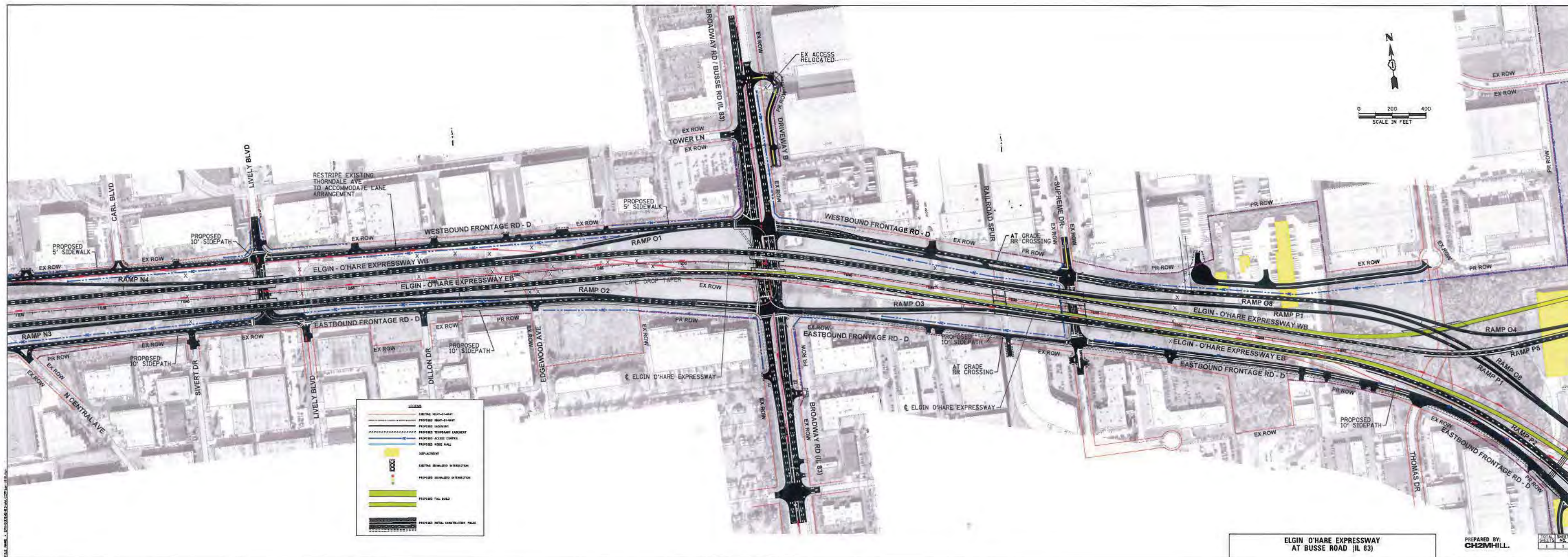
Very truly yours,

John Fortmann, P.E.  
Acting Deputy Director of Highways,  
Region One Engineer

By:   
Peter E. Harmet, P.E.  
Bureau Chief of Programming

Attachment

cc: Michael Cassidy, Village Manager, Village of Bensenville



ELGIN O'HARE EXPRESSWAY AT BUSSE ROAD (IL 63)

PREPARED BY: CH2MHILL

CENTRAL SECTION - PART B



**ELGIN O'HARE EXPRESSWAY  
AT BUSSE ROAD (IL 83)**

PREPARED BY:  
**CH2MHILL.**

TOTAL SHEETS	SHEET NO.
1	1

**CENTRAL SECTION - PART B**



**RESOLUTION 2012-1633**

**A RESOLUTION STATING THE PREFERENCES OF THE VILLAGE  
IN RELATION TO THE ELGIN O'HARE – WEST BYPASS STUDY  
(Tier Two Draft Environmental Impact Statement)**

**WHEREAS**, the Illinois Department of Transportation, in consultation with the Federal Highway Administration, the Illinois State Tollway Highway Authority (hereinafter "Tollway"), and others, has conducted a study of alternative multimodal transportation solutions for the Elgin O'Hare – West Bypass study area (hereinafter "Study"), which comprises 127 square miles and 27 communities in Cook and DuPage Counties in Illinois (hereinafter "Study Area"); and,

**WHEREAS**, the Village of Roselle, a municipal corporation located in DuPage and Cook Counties, Illinois (hereinafter "Village"), is one of the 27 communities within the Study Area; and,

**WHEREAS**, the Study is being advanced as a tiered process; and,

**WHEREAS**, Tier One, which is complete, yielded a preferred multimodal transportation concept for the Study Area, and Tier Two will yield detailed engineering and environmental studies for elements of the preferred concept; and,

**WHEREAS**, the Tier Two Draft Environmental Impact Statement for the Study (hereinafter "DEIS") has recently been published/released; and,

**WHEREAS**, the DEIS refines the preferred concept, referred to as Alternative 203D (hereinafter "Build Alternative"), which calls for, among other improvements, the widening of the existing, Elgin – O'Hare Expressway (hereinafter "Expressway"), which traverses the Village; and,

**WHEREAS**, the DEIS includes a concept plan for an initial construction phase (hereinafter "ICP") for the Build Alternative that the Tollway has included in its current capital program; and,

**WHEREAS**, the total estimated cost to construct the ICP exceeds the amount of monies budgeted by the Tollway (hereinafter "Funding Gap"); and,

**WHEREAS**, the Funding Gap may be filled with federal, state, or local monies, as well as with in-kind contributions; and,

**WHEREAS**, the budget of the Village has been, and continues to be, negatively and severely impacted by the general downturn in the economy and the slow recovery from the downturn, and will continue to be negatively impacted by unfunded state mandates, increasing pension obligations and other factors; and,

**WHEREAS**, the Village has supported the conversion of the Expressway to a tolled facility, as a method of providing financial support for the improvements called for in the DEIS, which will require residents, businesses, and visitors of the Village to pay tolls for interstate access that such persons do not pay at present – since the Expressway is not a tolled facility today; and,

**WHEREAS**, several residential neighborhoods surround the Expressway in those areas where the Expressway traverses the Village (hereinafter "Impacted Neighborhoods"); and,

**WHEREAS**, the existing noise barriers along the Expressway are insufficient to reduce traffic noise to acceptable levels in the Impacted Neighborhoods should the ICP or Build Alternative be constructed; and,

**WHEREAS**, the DEIS, in Section 3.8.3.2, entitled "Noise Barrier Analysis," indicates that new noise barriers – specifically Barriers B2, C1, and C3 – are "likely" near the Impacted Neighborhoods; and,

**WHEREAS**, the unincorporated area of Cook County to the south of the Expressway and to the west of Roselle Road contains a residential neighborhood that

did not exist at the time of construction of the Expressway (hereinafter "Unincorporated Neighborhood"); and,

**WHEREAS**, prior to its development, the Unincorporated Neighborhood contained several, small wetlands; and,

**WHEREAS**, the Unincorporated Neighborhood was developed without a storm water management plan; and,

**WHEREAS**, the Unincorporated Neighborhood is part of the Salt Creek Watershed and is located upstream of portions of the Village; and,

**WHEREAS**, the Expressway traverses the Salt Creek Watershed upstream of the Unincorporated Neighborhood; and,

**WHEREAS**, at the time of the construction of the Expressway, after discharging from the single, storm water pipe under the Expressway in the vicinity of the Unincorporated Neighborhood, storm water runoff flowed across the undeveloped land in the Unincorporated Neighborhood to the several, small wetlands that have been filled but not mitigated since that time; and,

**WHEREAS**, this situation has negatively impacted some of the neighborhoods downstream of the Unincorporated Neighborhood, which are in the Village; and,

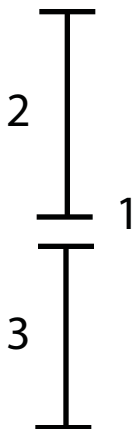
**WHEREAS**, the Study has been advanced as a collaborative and consensus building process and enjoys the support of all communities and stakeholders.

**NOW, THEREFORE, BE IT RESOLVED**, by the President and Board of Trustees of the Village of Roselle, DuPage and Cook Counties, Illinois, as follows:

1



- A. The foregoing recitals are incorporated herein as representing the understanding of the Village of the facts associated with the Study, the Build Alternative, the ICP, and as defining the terms used herein.
- B. The Village’s support for the conversion of the Expressway to a tolled facility, and the forthcoming tolls its residents, businesses, and visitors will be required to pay to access the Expressway shall constitute the Village’s and its residents’ sole contribution (financial, in-kind, or otherwise) to filling the Funding Gap. However, this shall not prevent the Village President or Village Staff from working with the Tollway, the County of DuPage, and others to pursue monies to fill the Funding Gap from sources other than the Village or its taxpayers.
- C. The Village advocates that noise barriers – specifically Barriers B2, C1, and C3 as identified in the DEIS – be constructed near the Impacted Neighborhoods as an element of the ICP.
- D. That the Tollway work with the Village to improve existing drainage patterns in the impacted neighborhoods immediately downstream of the Unincorporated Neighborhood as an element of the ICP.
- E. The advancement/completion of the Study, and the process of constructing the Build Alternative, continue to be a collaborative and consensus building process in which all communities and stakeholders move forward together.
- F. The Roselle Village Board support is predicated on the complete build out of Alternative 203D, which includes: full western access and a functional western terminal with ring roads connecting the Elgin O’Hare north to I-90 and south to I-294
- G. Upon adoption and publication of this Resolution as required by law, the Village President or the Village Administrator – or his/her designee – is



hereby authorized and directed to forward a copy of this Resolution to IDOT, to the Tollway, and to all federal and state legislators representing all, or a portion of, the Village.

1

H. A copy of this Resolution shall also be forwarded to IDOT prior to the end of the public comment period associated with the DEIS so as to become an element of the public's comments.

ADOPTED THIS 14<sup>th</sup> day of May, 2012.

AYES: Wittman, Maglio, Atkinson, Baker, Hochstadt, Domke

NAYS: None

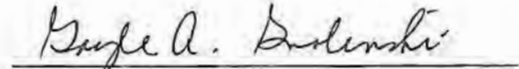
ABSENT: None

VILLAGE OF ROSELLE:

ATTEST:



Patricia E. Burns  
Clerk, Village of Roselle, Illinois



Gayle A. Smolinski  
President, Village of Roselle, Illinois



March 27, 2012

Ms. Lidia Pilecky, P.E.  
Project Manager  
CH2M HILL  
8735 W. Higgins Road, Suite 400  
Chicago, Illinois 60631-2801

**RE: Elgin O'Hare – West Bypass**

Dear Ms. Pilecky:

Thanks for the opportunity to comment on the draft Proposed Drainage Plans for the Tier Two Build Alternative of the Elgin O'Hare – West Bypass project. Our (i.e. the Village of Roselle's) comments related to drainage are attached.

We look forward to the opportunity to review subsequent versions of these plans as well as to working with CH2M Hill and the implementing agency, the Illinois Tollway, to find a solution to the comments.

Sincerely,

Robert L. Zimmerer  
Village Planner

Enclosure

Cc: Ron Krall (IDOT)  
Gayle A. Smolinski (Mayor, Village of Roselle)  
Jeff O'Dell (Administrator, Village of Roselle)



Public Works Department  
Robert O. Burns, Director

March 22, 2012

Re: Comments on Elgin-O'Hare Drainage

3

Roselle has serious concerns about discharge of stormwater runoff from the Elgin-O'Hare project in the vicinity of the south west quadrant of the intersection of the project with Roselle Road. Serious drainage problems and flooding in a residential area of Roselle (bounded roughly by the Elgin-O'Hare, Roselle Rd., Devon Av. and Lincoln Street) began with the original Elgin-O'Hare project. In the original project, a culvert under the Elgin-O'Hare was installed, approximately at Lincoln Street. This culvert conveys and concentrates runoff from a water shed of approximately 100 acres north of the Elgin O'Hare in unincorporated Cook County. Significant development has occurred in this watershed with no regard to site runoff control. Conveyance to the Roselle residential area downstream of the culvert beneath the expressway was and continues to be insufficient to deal with the concentrated runoff at this culvert discharge.

Roselle has invested in excess of \$400,000 purchasing land and creating additional detention volume to alleviate the flooding issues in the area with partial success. Any additional runoff discharged into the area by the new Elgin-O'Hare expansion project will result in flooding in the area.

A potential solution to this problem would be to convey runoff from the project at Roselle Road in a pipe south on Roselle to Devon Av and Turner Pond, bypassing the affected residential neighborhood. Roselle will investigate to determine the capacity at Turner Pond and the conveyance systems downstream for additional runoff. Roselle urges that if this solution proves feasible that the new storm sewer be as large as possible to potentially convey some of the existing discharge from the culvert at Lincoln as well as any new discharge from the new Elgin-O'Hare project at Roselle Road.



Public Works Department  
Robert O. Burns, Director

May 22, 2012

BUREAU OF PROGRAMMING  
RECEIVED

IDOT  
Pete Harmet, Bureau Chief of Programming  
201 West Center Court  
Schaumburg, IL 60196

MAY 24 2012

DISTRICT #1

Re: Elgin-O'Hare Bypass Project

Our review of the Roselle portion of the project continues just as your review continues to be refined in the entire corridor. To quickly capture your attention, we have a large volume of fill material at the expressway site on Roselle Road. It's yours to take – no charge and the shortest haul distance imaginable. The Heathergreen storm water basin is located west of Roselle Road, south of the Elgin-O'Hare expressway and north of Arthur Avenue. A few years ago, the Village increased the storage volume in basin by excavation. The excavated material was stockpiled to the east of the basin. Due to the closeness of this stockpile to the Elgin-O'Hare expressway, will feel that this stockpiled material could be used during the construction of the subject project.

3

Even with the expansion, the Heathergreen storm water basin will fill and overtop in a southward direction during frequent storm events. The overflow adversely impacts the surrounding residential area. The basin drains by storm sewer to Turner Pond which is located southeast of the Roselle Road and Devon Avenue intersection. As you are aware, a considerable portion of the Elgin-O'Hare expressway drains to the basin. We had hydrologic and hydraulic analysis performed that indicates the addition of a new 18-inch storm pipe from the basin to Turner Pond will help reduce the depth and frequency of basin overtopping without adversely impacting downstream areas. We request that this new 18-inch storm sewer be included in the first phase of the subject project.

The sidewalk proposed for the eastside of Roselle Road just south of the Elgin-O'Hare expressway entrance ramp is a very small missing link to the sidewalk system and should be constructed in the first phase of the project rather than the final phase. A worn path is visible in the turf. The estimated cost was \$15,000 to construct. However, the parcel is outside of the village limit. This appears to be a minor oversight.

We are willing to meet with you to discuss these important issues.

Rob Burns, Public Works Director

- C: Gayle Smolinski, Mayor
- Jeff O'Dell, Village Administrator
- Bob Zimmerer, Village Planner



# Illinois Department of Transportation

Division of Highways/Region One / District One  
201 West Center Court/Schaumburg, Illinois 60196-1096

October 15, 2012

The Honorable Gayle Smolinski  
Mayor  
Village of Roselle  
31 S. Prospect Street  
Roselle, IL 60172

Re: Elgin O'Hare – West Bypass Project  
Response to Resolution 2012-1633

Dear Mayor Smolinski:

We are writing in response to your letter and acknowledge your comments contained in Resolution 2012-1633 related to the Elgin O'Hare – West Bypass (EO-WB) project.

Thank you for the Village's continued support for the EO-WB project and your active participation in the Environmental Impact Statement (EIS) study process. The collaboration between involved communities and groups to date has been instrumental in moving this project forward. The Illinois Tollway, the implementing agency for the project, is committed to advancing this project in a collaborative manner with involved communities and stakeholders. Central to the coordination process will be the Local Advisory Committee (LAC), which will include representatives of municipalities along the proposed corridors. The Illinois Tollway plans to initiate work with the LAC later this fall, and will be contacting you regarding Village participation.

The LAC will discuss a broad range of issues, including refined engineering and environmental features, as well as the status of project financing, which is being led by DuPage County.

Noise barriers are proposed at various locations to mitigate project-related traffic noise impacts. Proposed noise barriers B2, C1, and C3, as identified in the Tier Two Draft EIS, are planned to be constructed as part of the EO-WB Initial Construction Plan. Detailed design features of the noise barriers will be developed during the final design process.

We understand the Village's concerns with drainage in the residential area near the southwest quadrant of the existing Elgin-O'Hare Expressway and Roselle Road interchange. This area was evaluated as part of the overall location drainage study and was identified as a sensitive outlet. A review of Elgin-O'Hare Expressway drainage discharge revealed that the existing roadway and proposed improvements do not contribute additional flow to this sensitive outlet. In fact, flow traditionally directed to this sensitive outlet was reduced due to the storm sewer installed during original construction of the Elgin-O'Hare Expressway.

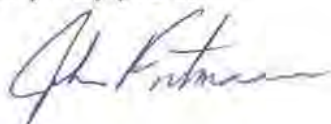
October 15, 2012  
The Honorable Gayle Smolinski  
Page 2

3 | The widening that is proposed as part of the EO-WB project under Full Build conditions will further reduce the flow to this outlet since stormwater runoff on the area of the widened expressway, currently tributary to the Heather Green basin, will be intercepted to drain eastwardly. Therefore, the drainage issues in this area appear to be unrelated to the Elgin-O'Hare Expressway. We suggest that the Village explore opportunities to incorporate complementary local drainage system improvements into the EO-WB project with the Illinois Tollway during final design.

IDOT, in coordination with the Illinois Tollway, is now moving forward with finalizing preliminary engineering studies and preparing the Tier Two Final EIS. The Illinois Tollway will work collaboratively with the Village and others to successfully advance implementation of the EO-WB project.

If you have any questions or need additional information, please contact me or Ron Krall, Project Manager, at (847) 705-4103 or by e-mail at [ronald.krall@illinois.gov](mailto:ronald.krall@illinois.gov).

Very truly yours,



John Fortmann, P.E.  
Acting Deputy Director of Highways,  
Region One Engineer

cc: Jeffery O'Dell, Village Administrator, Village of Roselle  
Mr. Robert Zimmerer, Village Planner, Village of Roselle



547 W. Jackson Blvd. Chicago, IL 60661 (312) 322-6900 TTY# 1-312-322-6774

May 1, 2012

Ron Krall  
Illinois Department of Transportation  
201 W. Center Court  
Schaumburg, IL 60196

Dear Mr. Krall:

Metra is pleased to have the opportunity to review the Tier Two Elgin O'Hare – West Bypass (EOWB) project Draft Environmental Impact Statement (DEIS). Metra has been an active participant in the development of this project over the past several years, through participation in the Transit Task Force and Corridor Planning Group. We want to applaud IDOT's efforts to include all affected stakeholders in this process, and we feel that our input throughout this process has been accurately reflected in the DEIS.

1 [ Metra recently completed an alternatives analysis study of transit options in the I-90/STAR Line corridor. The study identified commuter rail service as the long-term vision for the corridor, a decision supported by the I-90 Corridor Planning Council. Though development of transit on I-90 will proceed with interim services, starting with express bus service, Metra asks that the DEIS reflect the selection of commuter rail as the long-term vision for the corridor.

2 [ Right-of-way will be reserved on I-90 and on the north leg of the West Bypass in order to accommodate the long-term development of fixed guideway transit in these corridors, including a connection to O'Hare Airport's proposed West Terminal. Land reservation for transit on I-90 and the West Bypass is discussed in the DEIS, but Metra asks that the document specify that a minimum width of 74 feet will be reserved. The DEIS provides this measurement for other proposed transit corridors on the Elgin O'Hare Expressway and IL-53.

The DEIS states that Bus Rapid Transit (BRT) and Light Rail Transit (LRT) are being considered for the transit service in the median of the Elgin O'Hare. However, Table 2-2 on page 2-12 indicates that, in addition to BRT, multiple rail modes are being considered for the corridor: LRT, heavy rail rapid transit, and diesel multiple units. Metra urges IDOT to utilize this more expansive definition of transit modes under consideration, and identify "BRT/rail" as the proposed transit mode in the Elgin O'Hare corridor. The modal decision for transit in this corridor has not yet been made, and identifying LRT as the sole rail alternative unnecessarily constrains future options.

Metra appreciates the opportunity to be involved in this process, and we look forward to continuing to work with the EOWB team as this project moves forward, further addressing the transportation needs of the traveling public throughout the Chicago region.

Sincerely,

Lynnette H. Ciavarella  
Senior Division Director  
Strategic Capital Planning/Grants Development





# Illinois Department of Transportation

Division of Highways/Region One / District One  
201 West Center Court/Schaumburg, Illinois 60196-1096

September 26, 2012

Ms. Lynnette Ciavarella  
Senior Division Director  
Metra  
547 W. Jackson Boulevard  
Chicago, IL 60661

Re: Elgin O'Hare – West Bypass Project  
Response to comment on the Draft Environmental Impact Statement

Dear Ms. Ciavarella:

Thank you for the comments on the Elgin O'Hare - West Bypass (EO-WB) Draft Environmental Impact Statement (EIS). We offer the following responses.

1 The EO-WB project considered the eventuality of a long-term transit facility in the I-90 corridor. Along I-90, the Tier Two Final EIS references commuter rail service as the "long-term" solution, as recommended in the April 5, 2012 Interstate 90 Corridor Planning Council Findings and Recommendations Report that is referenced in your May 1, 2012 letter. Prior studies of transit in the I-90 corridor that have been sponsored and endorsed by Metra show a median right-of-way requirement of 35 feet for the proposed Star Line service. The Illinois Tollway will advance work for the reconstruction of I-90 and the EO-WB which would allow for the same consideration with the exception of the north leg of the West Bypass where a future transit facility is envisioned east of the proposed roadway extending from I-90 to the proposed West Terminal at O'Hare Airport. The dimensions stated in the Tier Two Draft EIS were inclusive of additional travel lanes, shoulders, and barriers.

IDOT and the Illinois Tollway agree that the more expansive definition of transit modes will be used in the Tier Two Final EIS; therefore, the term BRT/Rail will be used.

2 One of the objectives of the EO-WB project has been to develop a multi-modal planning solution that addresses the transportation problems in the project area. In considering the median proposed in the Elgin O'Hare corridor and elsewhere, the sizing of the median requirements has not pre-empted any bus or rail options. As noted in the Metra comments, the modal decision in the Elgin O'Hare corridor has not been made; therefore, the Tier Two Final EIS for the EO-WB recognizes that a broader definition of rail options is applicable, and that no preferred option is implied.

The Tier Two Final EIS is expected to be distributed later this year, and will incorporate public and agency comments received on the Tier Two Draft EIS. As the project advances, IDOT and the Illinois Tollway will continue to coordinate with those affected by the project.

Ms. Ciavarella  
September 26, 2012  
Page 2

If you have any questions or need additional information, please contact me or Ron Krall, Project Manager, at (847) 705-4103 or by e-mail at [ronald.krall@illinois.gov](mailto:ronald.krall@illinois.gov).

Very truly yours,

A handwritten signature in cursive script, appearing to read "John Fortmann".

John Fortmann, P.E.  
Acting Deputy Director of Highways,  
Region One Engineer

cc: Leann Redden, RTA



**MAYWOOD SPORTSMENS CLUB, INC.**

P.O. Box 522 • Elmhurst, Illinois 60126

www.MaywoodSC.org

May, 10, 2012

∞ Ronald Krall, PE  
HRGreen  
420 N. Front Street, Ste. 100  
McHenry, Illinois 60050

Illinois Department of Transportation  
201 West Center Court  
Schaumburg, Illinois 60196-1096

Dear Mr. Krall:

I am writing you about the County Line Road Ramp of I-294 South, which is part of the Elgin O'Hare Expansion Project (the Project). I am the President of Maywood Sportsmen's Club located at 700 N. County Line Road, Elmhurst Illinois 60126. Members of our organization met with Larry Martin of CH2MHill and other engineers of the project on April 18, 2012 at the Public Hearing on the Expansion Project. We also met with Larry Martin, Cheng Soong, all of CH2MHill and Manar Nasif of the Tollway Authority (the Engineers) in a private meeting on May 1, 2012.

Maywood Sportsmen's Club has been located on County Line Road since 1952. It comprises 62.7 acres of environmentally rich habitat for plants, fish and wildlife. The Club has 11 trap fields, 1 patterning field, a 23 position walk through archery range, two lakes and a significant wetlands area. The Club is used by 850 full and part-time members, youth groups, as well as, the local police and fire departments for training. It is truly an oasis in the middle of the surrounding industrial concrete jungle.

The Project as it is now proposed raises significant safety and environmental issues with respect to our property. Currently, the project is slated to take +/- 50 feet of the entire length of our property along County Line Road. The Engineers proposed possible alternatives on May 1, 2012 and I thought you should be made aware of the safety and environmental issues. The issues set forth below are not all encompassing. Additional issues may arise as a result of further investigation and/or review of the documents requested below.

We have a number of safety and environmental issues with the Project as it is now proposed:

1 [ First, the ramp, as proposed poses a significant safety risk to tractor trailers and vehicles pulling boat trailers making a right hand turn into Maywood's and McMaster's facilities. Those vehicles will have to come to a complete stop to make those turns. Traffic coming up behind them will be approaching at 60+ MPH which could result in a substantial number of increased rear-end collisions.

- 2 | Second, the same vehicles exiting Maywood and McMaster wishing to make a left hand turn onto County Line Road run the risk of getting T-Boned by vehicles exiting the ramp at 60+ MPH.
- 3 | Third, Maywood's facility is lit up like a baseball field at night. Those lights could pose a safety hazard to the vehicles exiting off the proposed ramp, blinding the drivers or severely distracting them at a critical time.
- 4 | Fourth, the lights from the vehicles exiting off the proposed ramp could pose a safety hazard to the members on the shooting line, temporarily blinding them at a critical time.
- 5 | Fifth, the use of Maywood as a shooting club is designed in such a way that there is a safety zone for the shooting areas for the fields that run parallel to County Line Road. Moving County Line Road over 50+ feet will result in the flow of traffic being moved into the safety zone and could be hazardous to the safety of approaching traffic.
- 6 | Sixth, a significant safety risk is at stake for the plant, fish and wildlife that use our lakes and wetlands for breeding and survival. In 2009, the Illinois DNR did a study on the Club's waterways and found elevated levels of chloride ion conductivity (973 umhos/cm) from the run off now. Adding additional lanes of traffic, 2000 additional vehicle emissions per day and moving the pollutants within 20 feet of the big lake will only send the salt and other pollutant levels through the roof. Increased levels will destroy the Club's valuable fish reproducing habitat. Drainage along the property frontage must be flowed away from the property to protect the environmentally critical habitat.
- 7 | Seventh, Maywood is a closed gated private facility. Construction on the property and temporary easements will leave the property open to trespassers. Water is a very inviting hazard for both adults and youth. Significant injury could result to unknown persons trespassing on the property both during shooting and non-shooting times.
- 8 | Eighth, Currently IDOT does not have a noise abatement wall proposed for the area because of the industrial setting of the uses along County Line Road. The noise abatement structures could serve multiple purposes along Maywood's property? (a.) Noise abatement, (b.) depending on the height, reduction of offending lights from both directions entering and leaving the property, (c.) increasing the safety zone for shooters on the firing line.

To further evaluate the effect of the proposed ramp on the use and infrastructure of Maywood's property and to better understand the scope of this project, we respectfully request the below partial list of items:

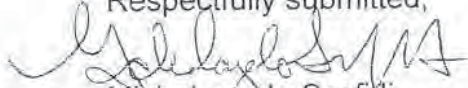
- 1) Copies of any Preliminary Engineering Studies
- 2) Copies of their Real Estate Acquisition studies for the project, showing all sites considered for this project.
- 3) Copies of their Preliminary Environmental Impact Study



- 4) Copies of their Traffic Studies
- 5) Any other studies, reports, plans pertaining to this project.
- 6) Copies of any preliminary cost estimates showing total project cost and total project schedule (critical path schedule showing milestones and the critical path for the overall project).

I look forward to hearing from you and a resolution to these very important issues. You can e-mail me your response and the documents requested at [WillHuntVegetariansforFood@Live.com](mailto:WillHuntVegetariansforFood@Live.com).

Respectfully submitted,



Michelangelo Scafidi

President, Maywood Sportsmen's Club



# Illinois Department of Transportation

Division of Highways/Region One / District One  
201 West Center Court/Schaumburg, Illinois 60196-1096

Project and Environmental Studies  
Elgin O'Hare – West Bypass  
Cook and DuPage Counties

October 3, 2012

Mr. Michelangelo Scafidi  
President, Maywood Sportsmen's Club  
P.O. Box 522  
Elmhurst, IL 60126

Re: Elgin O'Hare – West Bypass Project  
Response to comment provided during the public comment period

Dear Mr. Scafidi:

Thank you for the comments that you provided during the public comment period. The Illinois Department of Transportation (IDOT) and Illinois Tollway have considered each of the issues stated in your May 10, 2012 comment letter.

1,2,3,5,7

In your comment, concerns were cited regarding the proposed improvements along the Maywood Sportsmens Club (MSC) property. In response, several alternative locations have been examined, including moving the ramp either further north or south to address those concerns. Additional analysis and discussions with the MSC, the City of Elmhurst, the City of Northlake, and McMaster-Carr Supply Company has lead to a decision by IDOT and the Illinois Tollway to adjust the location of the ramp. In a joint meeting of the stakeholders on June 6, 2012, the re-evaluation of the ramp location was discussed and the preferred alternates presented. At that meeting, consensus was reached by the agencies and the stakeholders that the preferred location of the ramps would be shifted to option B, as shown in the attached exhibit.

6

The MSC also indicated concerns regarding what the potential impacts would have on the chloride levels in the lakes and wetlands on the MSC's property and the subsequent effect on breeding habitat for fish and wildlife. The Tier Two Draft Environmental Impact Statement (EIS) contains a detailed analysis of chloride runoff and related stream or water body contamination. It is important to note that planned roadway improvements in the vicinity of the MSC would be served by a closed drainage system. Stormwater piping would capture and convey roadway runoff to infield areas and/or to nearby stream channels, and the system would extend across the full length of the MSC property bordering County Line Road. Therefore, no fugitive runoff would reach the MSC's lake. Further, the U.S. Army Corps of Engineers (USACOE) has directed the project to use Best Management Practices (BMP) for enhancement of water quality.

Mr. Michelangelo Scafidi  
October 3, 2012  
Page 2

6 | The project team has developed a concept plan for the implementation of BMP for this purpose. The use of infiltration beds, bioswales, and dry basins are part of the family of techniques available for water quality enhancement.

| All sections of the project will require the use these BMP to address the requirements of the USACOE.

4 & 8 | MSC also noted that the tree line along County Line Road would be removed, and requested a screen or visual barrier along the roadway to reduce headlight glare into their property. The roadway improvements at this location will include a visual barrier approximately 1,100 feet in length and about eight feet high, and will likely be constructed as post and panel. The final details will be determined in final design, and will include further coordination with the MSC and other stakeholders.

The Tier Two Final EIS is expected to be distributed later this year, and will incorporate public and agency comments received on the Tier Two Draft EIS. As the project advances, IDOT and the Illinois Tollway will continue to coordinate with those affected by the project.

If you have any questions or need additional information, please contact Ron Krall, Project Manager, at (847) 705-4103 or by e-mail at [ronald.krall@illinois.gov](mailto:ronald.krall@illinois.gov).

Very truly yours,

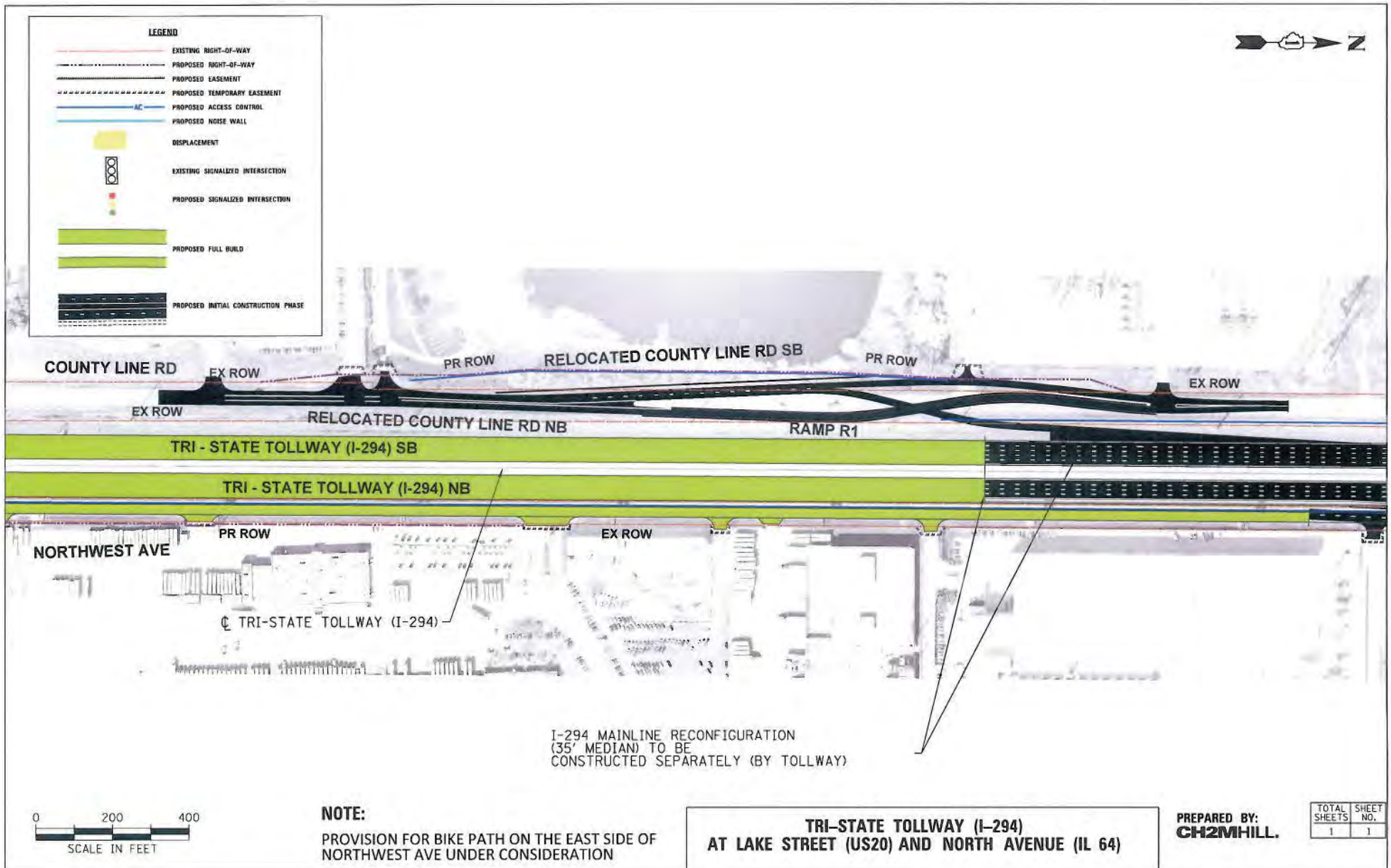
John Fortmann, P.E.  
Acting Deputy Director of Highways,  
Region One Engineer



By:  
Peter E. Harmet, P.E.  
Bureau Chief of Programming

Attachment

cc: James Grabowski, City Manager, City of Elmhurst



**SOUTH SECTION**



**BOARD OF COMMISSIONERS**

- Terrence J. O'Brien  
*President*
- Barbara J. McGowan  
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**Metropolitan Water Reclamation District of Greater Chicago**

100 EAST ERIE STREET CHICAGO, ILLINOIS 60611-3154 312.751.5600

May 10, 2012

Ms. Diane M. O'Keefe, P.E.  
 Deputy Director of Highways, Region One Engineer  
 Illinois Department of Transportation, Division of Highways/District 1  
 201 West Center Court  
 Schaumburg, IL 60196-1096

ATTN: Mr. Ron Krall, Project Manager

Subject: Tier Two Elgin O'Hare-West Bypass Project Draft Environmental Impact Statement (DEIS)

Property Owner Notification/Public Hearing Invite  
 Parcels ID(s): 0826102037, 0832620016, 0826200017, 0826201023,  
 0825100006, 0825102017, 0825103004, 0825400009, 0825402001,  
 0825403008

Dear Ms. O'Keefe:

Reference is made to your letters dated March 28, 2012, concerning the subject matter.

The Metropolitan Water Reclamation District of Greater Chicago (District) has reviewed the subject documents and has the following comments:

- 1 • DEIS, Section 3.4.3, discusses the potential impact of the West Bypass interchange with I-90 on the District's Touhy Avenue Reservoir. It suggests that the estimated 171 acre feet of storage that would be lost by the placement of fill in the east cell could be mitigated by constructing a separate storage cell adjacent to the reservoir, including a construction sequencing scheme, which appears to conform to the constraints discussed previously with your transportation engineers and planners. However, to ensure that the plan described in the DEIS is properly conveyed to the construction documents, we request formal approval of the plans and specifications by the District as well as coordination with the City of Chicago to comply with applicable terms of the existing Memorandum of Understanding related to reservoir operations.
- 2 • DEIS, Section 3.12, suggests that there will be several floodplain and some limited floodway impacts, including areas within Cook County. The effects of these impacts to be documented through IDNR permitting should be provided to the District in order to update the modeling developed for our Detailed Watershed Plans and used for resulting stormwater capital improvement projects.

- 3 • Section 3.10., notes that: "More development through infilling and selective redevelopment is expected to occur in the vicinity of the project corridor over the next 30 years. Additional impervious surfaces may be constructed as part of the anticipated development. Areas that are unprotected open, underdeveloped, or underused space may be developed to take advantage of better transportation and access. These effects would be most noticeable in proximity to the proposed Elgin O'Hare and West Bypass corridors." Since the Elgin O'Hare-West Bypass construction, as well as future development along the corridor, would likely impact local hydrology and resulting stormwater flows and water quality of area waterways, we would encourage the use of green infrastructure, such as bioswales, permeable pavement, etc., to minimize these impacts.
- 4 • The Property Layout Exhibit encompassing the Touhy/O'Hare Reservoir identifies three District parcels impacted by the Project. The District must be informed how the proposed partial acquisition and permanent easement of parcel 0825400009, as well as the temporary easement in parcels 0825403008 and 0825402001, impact any future maintenance, repairs, or improvements to this portion of the Reservoir.
- 5 • The Property Layout Exhibit identifying the tollway interchange at Elmhurst Road identifies District parcel 0825100006. Due to the ongoing disrepair of Wille Road and pedestrian safety issues during Majewski Park events, the District is determining a strategy for the final disposition of Wille Road. This may impact final design of the intersection.
- 6 • The Property Layout Exhibit shows impact to parcels 0825102017 and 0825103004. These parcels are leased to the Mt. Prospect Park District, and we recommend that they be included on any correspondence at:
 

Mt. Prospect Park District  
1000 West Central Road  
Mt. Prospect, Illinois 60056
- As a reminder, the District must maintain permanent easements to continue to maintain, repair, operate and remove any facilities or structures we have in areas that may be acquired by IDOT. For areas requiring permanent or temporary easements by IDOT, the District must maintain full 24-hour-per-day access to its facilities.

If you have any questions, please call Mr. Joe Schuessler, Principal Civil Engineer, at 312-751-3236.

Very truly yours,



William S. Sheriff  
Acting Director of Engineering

KMF:JMS

cc: Mr. Rocco Zuccero, Illinois State Toll Highway Authority, 2700 Ogden Avenue,  
Downers Grove, IL 60515



# Illinois Department of Transportation

Division of Highways/Region One / District One  
201 West Center Court/Schaumburg, Illinois 60196-1096

October 5, 2012

Mr. William S. Sheriff  
Acting Director of Engineering  
Metropolitan Water Reclamation District of Greater Chicago  
100 E. Erie Street  
Chicago, IL 60611

Re: Elgin O'Hare – West Bypass Project  
Response to comment on the Draft Environmental Impact Statement

Dear Mr. Sheriff:

Thank you for the comments on the Elgin O'Hare - West Bypass (EO-WB) Draft Environmental Impact Statement (EIS). We offer the following responses:

- 1 | • Further discussions and detailed plans are required to finalize the approach at the Touhy Reservoirs. As suggested by the MWRDGC, the plans and specifications for the work pertaining to the reservoirs will be submitted to the MWRDGC for review.
- 2 | • IDOT and the Illinois Tollway will provide the MWRDGC with the hydrological modeling work done for waterways affected by the project in Cook County. We anticipate that the modeling prepared for the drainage studies and investigations will suffice for the IDNR floodway construction permits.
- 3 | • Given the existing economic activity in the study area, and the enhanced access provided by the EO-WB project, indirect development is anticipated. The potential economic development aspects of this project have been studied in detail. Based upon extensive input from local communities, a greater diversity in business within the project area and greater employment opportunities are anticipated. As mentioned in the MWRDGC comment, with more development comes more impervious surfaces and greater requirements for stormwater management. During the development of the project, the communities most affected in the project area have participated to a very high level, and will continue to do so. These communities will receive the benefit from redevelopment, as well as the challenges of using the best tools that they can to affect good development. Green initiatives are quickly surfacing as the latest strategies in managing many of our environmental issues. Regional agencies such as the MWRDGC and Chicago Metropolitan Agency for Planning are already affecting the use of green initiatives in land planning and infrastructure planning throughout the area. Whereas, the core communities affected by the EO-WB project will continue to meet as part of the Tollway's Local Advisory Committee, the MWRDGC is welcome to pursue strategies with this group that could influence local initiatives for green practices related to land development and redevelopment.

Mr. William S. Sheriff  
 October 5, 2012  
 Page 2

3 | The EO-WB project has been cognizant of stormwater management and water  
 | quality enhancement throughout the project. With the full build alternative,  
 | there would be more than 60 detention basins and compensatory sites  
 | required. Furthermore, IDOT and Illinois Tollway will deploy Best Management  
 | Practices targeted at improving water quality throughout the project area.  
 | These practices will consist of bioswales, infiltration beds, and dry basins.

4 | • The Illinois Tollway will soon initiate an overall plan for the acquisition of  
 | property that is timed to the sequence of construction. To date, existing  
 | parcel and tax information has been used to define affected properties.  
 | More definitive work is required, particularly as it relates to defining  
 | needed easements. We are particularly sensitive to the special uses  
 | that are affected (i.e., Touhy Reservoirs), and the requirements for  
 | complete functionality and regular maintenance throughout the  
 | construction period. Through the design process, the Illinois Tollway will  
 | meet with the MWRDGC to finalize the land requirements for the  
 | roadway as they relate to fee simple acquisition, temporary easements,  
 | and permanent easements.

5 | • The current design for the Elmhurst at I-90 interchange shows that the  
 | Willie Road and Elmhurst Road intersection will remain left open to  
 | traffic from Elmhurst Road, with right-in and right-out movement only.  
 | Based on MWRDGC's final disposition of Willie Road, the Illinois  
 | Tollway is open to further discussions on this topic.

6 | • Future correspondence will include the Mount Prospect Park District, as  
 | suggested.

The Tier Two Final EIS is expected to be distributed later this year, and will incorporate public and agency comments received on the Tier Two Draft EIS. As the project advances, IDOT and the Illinois Tollway will continue to coordinate with those affected by the project.

If you have any questions or need additional information, please contact me or Ron Krall, Project Manager, at (847) 705-4103.

Very truly yours,



John Fortmann, P.E.  
 Acting Deputy Director of Highways,  
 Region One Engineer

cc: Walter L. Cook, Chief Executive Officer, Mount Prospect Park District



# Roselle Fire Department

100 E. Maple Avenue Roselle, Illinois 60172  
 Business: (630) 980-2043 Fax: (630) 980-8926

Robert J. Tinucci  
 Fire Chief

Date: May 10, 2012

To: Robert Zimmerer / Planner Community Development

From: Thomas P. Biscan / Fire Marshal

Re: Proposed Expansion of Elgin / O'Hare Expressway

Dear Robert:

It has been brought to our attention the Illinois Department of Transportation along with the Illinois Tollway Authority has proposed a future expansion of the above roadway which affects a large portion of the Village of Roselle's response to emergencies. We ask that you keep the following concerns in mind when communicating with the above state agencies to ensure an effective and safe response when emergencies arise on our portion of this roadway.

- 1 | 1.) Toll booth widths must be wide and high enough to allow our vehicle apparatus to pass safely through, aerial tower ladder for example needs 9' width and 13' height to enter roadway and weighs approximately 74,000 lbs.
- 2 | 2.) Access to fire hydrants must also be considered allowing the need for a water resource to mitigate a hazardous material spill or larger vehicle fire.
- 3 | 3.) Additional emergency vehicle turn-a-round at the western most portion of the roadway is needed for emergency vehicle access to help reduce response time.

It would be in the best interest of all entities if the above concerns were taken into serious consideration when moving forward in the future expansion of this roadway. Please feel free to contact our office at (630) 671-2842 with regard to any questions in this matter.

Sincerely,

Thomas P. Biscan / Fire Marshal  
 Roselle Fire Prevention Bureau



# Illinois Department of Transportation

Division of Highways/Region One / District One  
201 West Center Court/Schaumburg, Illinois 60196-1096

August 31, 2012

Mr. Thomas P. Biscan, Fire Marshal  
Roselle Fire Department  
100 E. Maple Avenue  
Roselle, IL 60172

Re: Elgin O'Hare – West Bypass Project  
Response to comment on the Draft Environmental Impact Statement

Dear Mr. Biscan:

Thank you for the comments on the Elgin O'Hare - West Bypass (EO-WB) Draft Environmental Impact Statement (Draft EIS) which addresses emergency vehicle movement in Section 3.5. We offer the following responses.

1 [ Tolling on the EO-WB will be all electronic. Thus, the tolling apparatus will be gantries or structures spanning over the roadway both at ramp and mainline locations. The traditional booth arrangement will not be present; therefore, there will be ample room for the fire department's vehicles to pass through and under the tolling structure. The vehicle width and height provided in your letter will become part of our design criteria to ensure that there are no constraints in the movement of your vehicles.

2 [ Access to water sources is vital in the conduct of the fire department's responsibilities. The Illinois Tollway will review these needs through the final design process; the location of hydrants will be reviewed in terms of access by the fire department from roadside locations. Further coordination with your department will be required to determine preferences and spacing. Access issues will be reviewed with the department to determine solutions for hydrants that may be remotely located or behind noise walls. Resolution of these situations may require access through the wall, or relocating the water source for convenient access from the roadway.

3 [ The location of vehicle turn-arounds will be coordinated with your department along the western portion of the project. Coordination of emergency vehicle turn-arounds will also occur throughout the project with other agencies.

The Tier Two Final EIS is expected to be distributed later this year, and will incorporate public and agency comments received on the Tier Two Draft EIS. As the project advances, The Illinois Department of Transportation (IDOT) and the Illinois Tollway will continue to coordinate with those affected by the project.

Mr. Biscan  
August 31, 2012  
Page 2

If you have any questions or need additional information, please contact Ron Krall, Project Manager, at (847) 705- 4103 or by e-mail at [ronald.krall@illinois.gov](mailto:ronald.krall@illinois.gov).

Very truly yours,

John Fortmann, P.E.  
Acting Deputy Director of Highways,  
Region One Engineer



By:  
Peter E. Harmet, P.E.  
Bureau Chief of Programming

cc: The Honorable Gayle A. Smolinski, Village of Roselle  
Christopher Snyder, County Engineer, DuPage County



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info@activetrans.org  
www.activetrans.org

May 11, 2012

BUREAU OF PROGRAMMING  
RECEIVED

MAY 14 2012

DISTRICT #1

Pete Harmet, Bureau of Programming  
Illinois Department of Transportation  
201 West Center Court  
Schaumburg, IL 60196

Dear Mr. Harmet,

Active Transportation Alliance appreciates the opportunity to offer comments on the Draft Phase Two Environmental Impact Statement (Draft EIS) for the Elgin-O'Hare Expressway-West Bypass project. Active Transportation Alliance is Chicagoland's voice for better biking, walking and transit. We advocate for transportation solutions that make it easier and safer to use active modes of transportation.

**Transit Accommodations**

1 | Transit service should be incorporated into any highway expansion project. We are concerned that the Draft EIS has no plans for how people will connect to the transit service. The Draft EIS suggests that the transit service will be in the highway median and presumably this is where transit stations will be. However, there are no plans offered for bicycle and pedestrian facilities on the bridges and underpasses leading to these stations. We urge you to rectify this oversight and include such accommodations in future plans.

**Bridges and Interchanges**

2 | The Draft EIS identifies 73 new bridges required for the project. Many of these are on important regional corridors. There is no mention in the Draft EIS of accommodations for active transportation users on these bridges. We urge you to ensure that all roadway bridges accommodate all users, bicyclists, pedestrians, transit service and private vehicles. This is in conformity with the Complete Streets policies of State of Illinois, Cook and DuPage counties.

There is an extensive discussion of system interchanges in the Draft EIS. In this discussion, no mention is given of Diverging Diamond Interchanges. These innovative designs have been proven successful in managing congestion, while reducing pedestrian and bicycle crashes. We encourage you to study if they can be implemented in this project.



### **Frontage Road**

There is frontage road along most of the existing Elgin-O'Hare Expressway. The Draft EIS proposes for additional frontage road. Frontage roads should be configured to provide new facilities for bicyclists and pedestrians (who cannot of course use the highway). We encourage you to ensure that the frontage road be designed in conformity with Complete Streets design principles. The Draft EIS also identified 31 arterial road changes needed in the vicinity of the expressway. These projects should also be designed in conformity with Complete Streets principles. One example of concern of ours is the provision of a double-left turn at IL-19 and Wise Road. These types of intersections are very dangerous for bicyclists with high speeds, lots of turning vehicles and poor sight lines. We look forward to more detailed plans outlining your strategy for accommodating all roadway users in all of the roadway projects.

3

The Draft EIS proposes a 10-foot side path along the east-west portion of the expressway. This sidepath would be located on only one side of the expressway and would not be continuous. We are concerned that the lack of continuity will limit bicycle and pedestrian access to important businesses and other destinations in the corridor. We are also concerned that bicyclists and pedestrians will have no accommodation on one side of the expressway. Thus, the highway corridor becomes a major barrier for north-south travel. This will pose significant problems for people trying to access the many employment centers to the north of the highway. It will also cause great difficulty for Schaumburg residents to access their Metra station located south of the expressway.

There should be a continuous sidepath on both sides of the expressway. The document also says that although space is preserved for the sidepath there is no guarantee of funding for the construction. The construction of the sidepath should be integrated into the overall construction schedule. The state Complete Streets policy requires state funding for the sidepath as the appropriate accommodation given the speed, traffic volume and other considerations of the project. The Draft EIS states that the bicycle and pedestrian accommodations were coordinated with this organization. We cannot support these plans as written.

### **Transportation Demand Management**

4

The Draft EIS states that transit and bicycle/pedestrian accommodations are transportation demand management strategies. We applaud your recognition of the role of active transportation in mitigating congestion. The Draft EIS however lists only one specific strategy for TDM in this project, namely managing lanes. Transportation Demand Management is a much broader set of strategies. One community in the project area (Schaumburg) has a particularly noteworthy TDM program that provides incentives for vanpools to/from Metra stations.

4

Highway expansion can undermine active transportation by encouraging land uses and travel decisions that are car dependent. These projects can also create physical barriers to biking, walking and transit. The only sustainable way to effectively mitigate congestion and high gas prices is to help people drive less. This project will result almost surely in more driving over time, even if transit is incorporated. We urge you to consider a combination of land use improvements, expanded transit, TDM and local road improvements before expanding the highway corridor.

Thank you again for the opportunity to comment on the proposed plans for the Elgin-O'Hare Expressway. If you have any questions or concerns, please contact Dan Persky (Director of Policy and Planning) at 312.427.3325 x229 or [dan@activetrans.org](mailto:dan@activetrans.org).

Sincerely,



Ron Burke  
Executive Director

# COMMENT FORM



Do you have comments?

Please fill out this sheet and mail it back to us by May 14, 2012.



At this point, we are just requesting <sup>(the large)</sup> graphics but will provide more detailed comments.

4 | 1) Proposed Bicycle / Pedestrian <sup>System</sup> Improvements

1 | 2) Proposed Transit Improvements

3) Initial Construction Plan (2013-2025) Area Map

Thank-you!

I (do  do not ) desire a response.

Would you like your name added to our project mailing list?  
Yes  No

Name: Ruth Myers, Active Transportation Alliance  
Address: 9 West Hubbard St. Ste. 402  
Chicago, IL 60657-6545  
Phone: 312-427-3325 ext 242



# Illinois Department of Transportation

Division of Highways/Region One / District One  
201 West Center Court/Schaumburg, Illinois 60196-1096

October 5, 2012

Mr. Ron Burke  
Executive Director  
Active Transportation Alliance  
9 West Hubbard Street  
Chicago, IL 60610-6545

Re: Elgin O'Hare – West Bypass Project  
Response to comment on the Draft Environmental Impact Statement

Dear Mr. Burke:

Thank you for the comments on the Elgin O'Hare – West Bypass (EOWB) Draft Environmental Impact Statement (EIS). We offer the following responses:

## **Transit**

In your comments, you requested additional information regarding bicycle and pedestrian connections to proposed transit facilities. Vehicular and pedestrian access to transit stations is essential, and our studies have considered pedestrian and bicycle access to proposed stations located in the medians. The focus of the pedestrian and bicycle plan is the (east-west) Elgin O'Hare corridor. This facility will provide connectivity to north-south regional and community trails and places of interest including the Ned Brown Forest Preserve, Metra stations, proposed transit stations in the Elgin O'Hare corridor, employment centers, and community centers. Associated with the transit stations are accommodations for parking and bicycle storage. Access from the parking and bicycle storage would be provided by pedestrian only walkways to the stations located in the roadway median. These facilities will be constructed by the implementing transit agency. The Illinois Department of Transportation (IDOT) and the Illinois Tollway believe that pedestrian and bicycle access to transit facilities has been thoroughly addressed as part of the overall process. Station concepts were discussed with the transit agencies, and the footprint has been developed that accounts for these elements while also providing flexibility for further refinement. We have enclosed a copy of the Tier Two Transit Studies memorandum for additional information.

1

Mr. Ron Burke  
 October 5, 2012  
 Page 2

### **Bridges and Interchanges**

2 You also requested further information regarding accommodations for non-motorized users relative to bridges along the corridor. Most of the 73 bridges required for the project are access controlled mainline and ramp bridges that cross over roads, streams, or railroads; bicycle or pedestrian travel on full access control facilities is prohibited. Arterial road crossings (over or under the mainline), however, are located throughout the project. The Draft EIS described the east-west pedestrian/bicycle facilities along the Elgin O'Hare corridor and its connectivity to major north-south routes such as the North DuPage Regional Trail, the Salt Creek Greenway Trail, and the Schaumburg Community Trail. In these cases and others, a shared-use path (10 foot wide cross-section) would be located on one side of the crossing roads and would be extended to connect to the nearest local and/or community bicycle and pedestrian path. Newly constructed paths would be implemented at the request of a local municipality or agency and would require cost participation. Future maintenance would also be the responsibility of the requesting entity. These details are stated on page 2-33 of the Draft EIS.

A request was included in your letter for more information regarding the diverging diamond interchange (DDI) type. Numerous interchange types were considered for each of the local access interchange locations. Among the interchange types was the diverging diamond (see page 2-24 of the Draft EIS). The DDI has emerged as the preferred interchange type at the Elmhurst and I-90 interchange for many of the reasons that are mentioned in your comment letter. For additional information on DDI's, please visit these websites:

<http://www.modot.mo.gov/stlouis/links/DivergingDiamondInterchange.htm>

<http://www.udot.utah.gov/sr92/interchanges.php>

### **Frontage Roads**

3 We acknowledge your support for the provision of bicycle and pedestrian facilities along the frontage roads and your advocacy for continuous bicycle and pedestrian facilities where practical. Overall, the plan has been developed on the basis of Complete Streets requirements, as well as project conditions and constraints. The proposed frontage road system along the Elgin O'Hare corridor provides the best opportunity for the incorporation of bicycle and pedestrian facilities. However, the frontage system in the Elgin O'Hare corridor is not continuous, and therefore, there are gaps in the facility improvements immediately adjacent to the Elgin O'Hare corridor. Please note that these gaps can be linked with other existing or planned local and community trails that are parallel to the Elgin O'Hare corridor.

As design work advances, the bicycle and pedestrian plan will be refined and the thoughts that you have enumerated in this particular comment will be revisited with local agencies.

Mr. Ron Burke  
 October 5, 2012  
 Page 3

In regards to your comment about conformity with Complete Streets principles, it is important to note that this project is an opportunity to further integrate plans and create a framework for future design and construction of a well connected regional trail network. Improvements have been identified (many outside the project vicinity) in addition to those included in the current design, so that any other projects that arise in the future can incorporate the necessary pedestrian and bicycle routes.

3

We agree that consideration should be made for pedestrian and bicycle accommodations at the IL 19/Barrington and IL 19/Wise Road intersections, and will provide appropriate accommodations. However, please note that these two intersections are not included in the Initial Construction Plan being implemented by the Illinois Tollway. These intersections will be considered for improvement by IDOT as future Programs are developed. Additionally, we are working with the Village of Hanover Park regarding the redevelopment of properties near these intersections. Dual left turn lanes are proposed at the IL 19 and Barrington Road intersection to accommodate the high volume of left turning vehicles and care will be taken so that accommodations among all modes have minimal conflicts.

#### **Travel Demand Management**

The application of Transportation Demand Management (TDM) strategies is a joint effort involving multiple state and federal agencies, as well as the communities and individual stakeholders that reside in the region and the study area. The communities have long been aware of the proposed project, and IDOT and the Illinois Tollway have worked closely with adjoining communities with respect to land use. However, the implementation of orderly and sustainable land use and development ultimately rests with the local communities.

4

Please also note that while TDM is an element of this project, it is not sufficient to address travel demand in the area. However, the combination of various strategies addresses the overall needs of the area, and TDM has a role in improving travel. TDM Strategies that are commonly implemented today include message signs, incident management, and vanpools/shuttles that link transit with job and activity centers. Congestion pricing is an option for the future. Examples in the U.S. include guaranteed trip speeds of 45 miles per hour or greater.

The Tier Two Final EIS is expected to be distributed later this year, and will incorporate public and agency comments received on the Tier Two Draft EIS. As the project advances, IDOT and the Illinois Tollway will continue to coordinate with those affected by the project.

Mr. Ron Burke  
October 5, 2012  
Page 4

If you have any questions or need additional information, please contact me or Ron Krall, Project Manager, at (847) 705-4103 or by e-mail at [ronald.krall@illinois.gov](mailto:ronald.krall@illinois.gov).

Very truly yours,

A handwritten signature in blue ink, appearing to read "John Fortmann".

John Fortmann, P.E.  
Acting Deputy Director of Highways,  
Region One Engineer

Enclosure

cc: Dan Persky, Active Transportation Alliance  
Ruth Myers, Active Transportation Alliance

## Elgin O'Hare - West Bypass: Tier Two Transit Studies

TO: Illinois Department of Transportation District 1/Illinois Tollway  
FROM: CH2M HILL  
DATE: June 19, 2012

This memorandum elaborates upon the Tier Two transit studies conducted for the Elgin O'Hare - West Bypass (EO-WB) project. The transit studies are based on the complete Build Alternative, as identified in the *Tier Two Draft Environmental Impact Statement* (FHWA and IDOT, 2012).

### Background (Tier One)

Transit has been an integral component of the overall EO-WB project in both Tier One and Tier Two of the study process. From the onset of the EO-WB project, stakeholders stated the preference for more transit opportunities as part of the overall transportation solution. As such, new transit opportunities and connections in the study area were regarded as an important objective, and consequently are a component of the project Purpose and Need, and the overall transportation solution for the study area.

Tier One defined the scope of the potential transit opportunities for the area. These opportunities consisted of 16 transit corridor improvements including commuter rail service, rail or bus rapid transit (BRT), express bus, local bus, and shuttles (to be implemented by others). Other facets included new transit stations, intermodal facilities or transit centers, and park and ride facilities. The centerpiece of the transit plan includes a transit corridor in the median of the Elgin O'Hare corridor from the proposed O'Hare West Terminal station to the Schaumburg Metra Milwaukee District West (MDW) station. This transit service would likely be either BRT or rail and would link residents with jobs and activities within the corridor, and would help accessing jobs for reverse commuters (the future type of service will be determined by transit officials and units of government). The east end of the service would connect to O'Hare International Airport (O'Hare Airport), which plans the West Terminal and collateral development. A portion of the future trips generated by the new terminal activities, collateral development, and other activities would be well served by the proposed transit improvements. The possible extension of the CTA Blue Line to the proposed West Terminal would expand the market potential of the transit service in the Elgin O'Hare corridor to northwest Chicago and Rosemont. Express bus, circulator bus routes and shuttles connected to and extending from this east-west transit corridor were planned to develop better connections to stations, and employment and activity centers. Transit stations were added at key locations, as well as park and ride facilities to provide convenience to the system. The sum of these Tier One improvements was aimed at providing an alternative to the automobile for area residents and workers.



## Tier Two

The Regional Transportation Authority (RTA), in a partnership with IDOT, jointly funded the next steps in the EO-WB Tier Two transit study efforts. Tier Two revisited and refined the preferred transit options studied in Tier One, focusing on transit facilities that would be co-located in the roadway improvement corridors or logical extensions from the roadway corridors. The main transit feature is the preservation of space in the median of the east-west corridor (Elgin O'Hare corridor) from the western edge of O'Hare Airport to Schaumburg, sized to accommodate either BRT or rail transit (i.e., light rail transit, commuter rail, or heavy rail transit). Transit stations are provided at regular intervals with station access and parking. The project footprint for the Elgin O'Hare corridor has been sized to include the transit reservation. The implementation of the transit service and the transit type would be the responsibility of others (i.e., transit providers), and the timing of construction would be dependent on the market demand and financial considerations. The implementing agency would be required to provide the infrastructure inclusive of track or pavement, bridges, stations, pedestrian access and parking, signage, and signal controls for rail, and rolling stock.

Transit considerations have also included future transit service extending from the I-90 corridor to the proposed O'Hare West Terminal. The north leg of the West Bypass, in this case, has been located to provide sufficient space for such a transit facility to be placed along the east side of the roadway if warranted by future market demand. Extended transit service from the east-west transit corridor was also evaluated for routes from Schaumburg to Hanover Park, from the Elgin O'Hare corridor to Woodfield Mall along Rohlwing Road (IL 53), and from the proposed West Terminal to Rosemont – each are discussed in detail in the subsection *Extended Transit Service*.

In Tier Two, the transit concept was advanced with detailed study of those transit features to be co-located with roadway improvements. The objective of the Tier Two transit study was to refine the concept such that:

- 1) All the basic elements of the plan are reasonably defined (i.e., station locations, parking, pedestrian access, auxiliary service, cost estimates, etc.), and
- 2) The requirements of the transit plan are accurately reflected in the project footprint and preliminary design for the roadway plans. The transit study in Tier Two was accomplished by a series of special studies that examined various aspects of the transit requirements. Each of these studies advanced the detail of the transit concept and provided needed input to the preliminary roadway design process. The technical memorandums prepared for each of these special studies listed below are included in the project files and are available upon request:
  - Re-examination of the transit corridor location (in the median or side or frontage road) and determination of the transit right-of-way cross-section – *Transit Corridor Location Analysis Memorandum*, July 2010;
  - Examination of the feasibility of managed lanes – *Managed Lane Case Study Memorandum*, August 2010;
  - Examination of phasing the development of transit facilities – *Phased Transit Plan*, January 2011;

- Refinements of transit station locations including station configuration and auxiliary facilities, such as parking, pedestrian access, etc. – *Transit Station Location Refinement Memorandum*, August 2010 and *Bus Rapid Transit Comparison Analysis - IL-53 (Rohltwing Road)*, October 2011;
- Examination of extended transit service: to Hanover Park from Schaumburg and from the west O'Hare terminal to Rosemont - *Transit Corridor Location Analysis Memorandum*, July 2010 and *Service Extension to Hanover Park Memorandum*, October 2010;
- Study of potential transit hub configurations - *Proposed New West O'Hare Terminal Transit Facilities*, June 2009 and *Commuter Rail and High Speed Rail Analysis from the Milwaukee West Line to O'Hare New West Terminal*, July 2011; and
- Consideration of transit operational requirements, including frequency of operation and costs - *Phased Transit Plan Memorandum*, January 2011, *Full Build Out Light Rail Stations Memorandum*, January 2011, *Operation, Maintenance, and Vehicle Costs for Hanover Park Connector Memorandum*, March 2011, and *Vehicle Costs for Full Build BRT or Light Rail Memorandum*, March 2011.

### Location of Transit Service

At the conclusion of the EO-WB Tier One process, the Elgin O'Hare transit corridor was defined as a dedicated transit corridor located in the median of the roadway lanes which could be either BRT or rail transit. As the Tier Two process began, members of the Transit Working Group, including CMAP, DuPage County, RTA, CTA, Metra, and Pace requested that the location of transit within the corridor be reconsidered to ensure that all possible locations have been fully evaluated and the best possible location selected. In addition to the median location, two additional locations were evaluated:

- **Frontage Roads:** run transit service along the frontage roads that are included in the roadway design.
- **Along-the-Side:** run bi-directional transit service within a dedicated corridor placed between the main expressway lanes and the frontage roads either just north of the expressway lanes or just south of the expressway lanes.

These two alignment options were defined, analyzed, and then compared to the original median alignment. The results are contained in the *Transit Corridor Location Analysis Memorandum*. Typical cross-sections for the median and along-the-side options are shown in Figures 1 and 2 below from the *Transit Corridor Location Analysis Memorandum*. Since the frontage roads option does not include any exclusive transit right-of-way, no cross-section drawing is shown for this option.

Figure 1  
Median Layout Cross-section

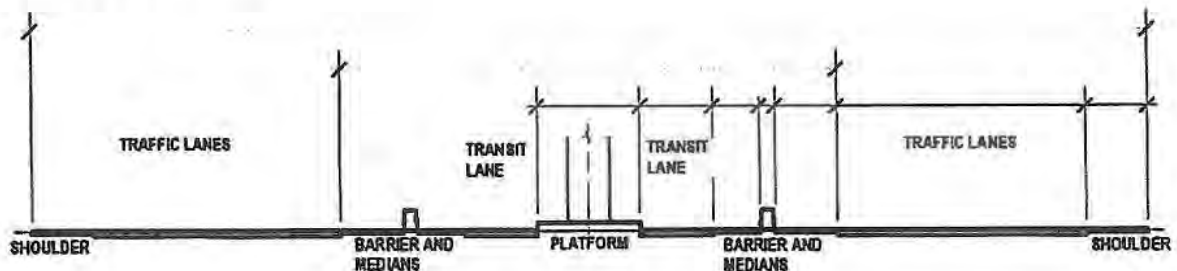
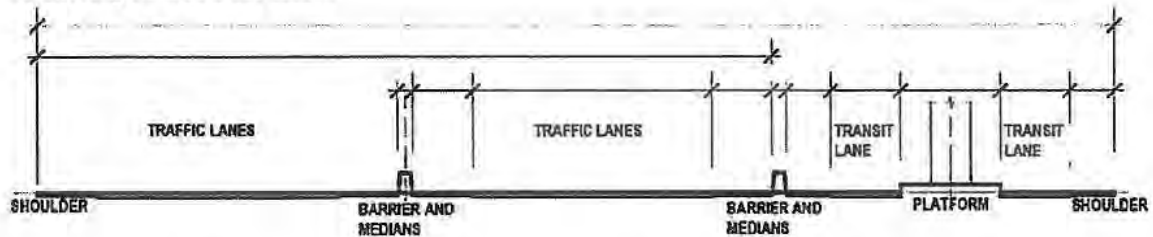


Figure 2  
Transit Along-the-Side Cross-section



The *Transit Corridor Location Analysis Memorandum* describes the purpose, methodology, and results of the analysis for the three transit corridor placement options in the Elgin O'Hare corridor. The memo concludes that the median corridor option is most preferable, as it presents the fewest drawbacks in terms of transit and roadway performance for the following reasons:

- The median alignment would be a fully dedicated transitway from start to end; it insures the highest potential level of service.
- The median service would include stations located in the median; walking distances via pedestrian bridges to destinations to the north or the south of the corridor would be relatively equivalent, contributing to a favorable passenger perception of service quality.
- The eastbound and westbound service would share a center platform; connectivity would also be provided to north-south bus services at these locations.
- Finally, the median service could accommodate alternative modes that are being considered or could be designed as a managed-lane or high occupancy vehicle (HOV) component if desired.

#### Transit Right-of-Way Cross-Section

Right-of-way requirements were determined for transit located in the median of the Elgin O'Hare corridor and documented in the *Transit Corridor Location Analysis Memorandum*. The analysis of right-of-way requirement for transit was used as input to the development of the overall roadway cross-section. The analysis determined that the transit requirements would be the same for either BRT or rail options. The cross-section would measure a minimum of 60 feet and would provide for one dedicated lane/track in each direction with accommodation for barriers and shoulders (see Figure 3 on the next page). The median width varies from 60 to 100 feet along the Elgin O'Hare corridor depending on the roadway constraints. The median size varies along three sections of the Elgin O'Hare corridor: along the existing Elgin O'Hare Expressway (from Gary Avenue to east of Meacham Road/Medinah Road) the median is 60 feet; along the Elgin O'Hare extension from IL 53 to Prospect Avenue the median is 100 feet; and along Elgin O'Hare corridor from Prospect Avenue to the O'Hare Airport the median is 74 feet. The extension of the Elgin O'Hare reserves space for transit service in the median. Along the existing Elgin O'Hare Expressway, the design also provides space for transit services in the median with the exception of the existing Roselle Road over Elgin O'Hare bridge. The existing bridge would need to be reconfigured to accommodate the planned transit corridor and associated station.

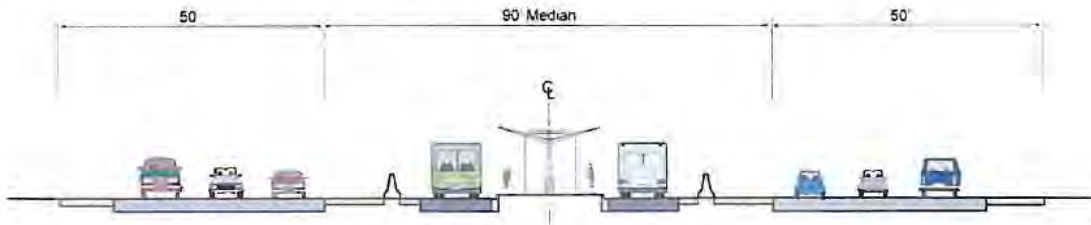
A study was performed to detail the median cross-section requirement at station locations. Based on applicable codes and standards, the right-of-way cross-section at station locations would be a minimum of 90 feet (see Figure 4).

**Figure 3**  
Representative Transit Cross-section without Station West of Meacham Road/Medinah Road (60' Median) <sup>a</sup>



<sup>a</sup> The median width west of Meacham Road/Medinah Road along the Elgin O'Hare corridor represents the minimum median required for transit accommodations. The median width varies along the corridor, where from IL 53 to Prospect Avenue the median is 100 feet and from Prospect Avenue to the O'Hare Airport the median is 74 feet.

**Figure 4**  
Representative Transit Cross-section with Station (90' Median)



In further study of transit service along the north leg of the West Bypass and along I-90 in the vicinity of the system interchange (West Bypass and I-90) it was concluded that transit would be best located to the south side of I-90 and the east side of the West Bypass. The median location in these areas was not conducive to ideal roadway geometric solutions or construction phasing of roadway improvements. The roadway alignment has been engineered in these cases to provide sufficient space to accommodate either BRT or rail (40-50 feet) to the south of I-90 and to the east of the West Bypass for transit service in the future. Prior studies of transit in the I-90 corridor have shown median right-of-way requirements to be a minimum of 35 feet. The median along the Elgin O'Hare corridor accommodates other features, such as shoulders, buffer areas, and barriers.

**Managed Lanes**

The *Managed Lane Case Study Memorandum* examines the use of a managed lane for transit service in the Elgin O'Hare corridor. The managed lane concept assumes that either the median or left-most lane would be managed, such as for the use of transit, HOV, or automobiles paying a toll premium. The analysis found that a managed lane could maximize person through-put rather than vehicle through-put, spread travel patterns, and have economic benefits while the disadvantages include, cost of additional infrastructure and controlled access issues.

## Phased Transit Plan

The *Phased Transit Plan* document examines phased implementation of transit service for the project. The pros and cons and recommendations are provided. While, the roadway development will be phased, it was appropriate to consider a phased development plan for transit. In the examination of a phased development strategy for transit, the major objective was to maintain the high-level performance of the transit service as originally intended in the Tier Two Build Alternative.

Phased implementation of transit service would provide an express bus service along the Elgin O'Hare corridor using regular travel lanes with the option to use shoulder riding during periods of congestion. Bus stops would approximate the Tier Two Build Alternative station locations with stops at the proposed West Terminal, Wood Dale Road, Prospect Avenue/Arlington Heights Road, Meacham Road, Roselle Road, and Schaumburg Metra Station. Bus stops would be located on the interchange ramps at these locations allowing easy on-off movements. The express bus service would approximate the frequency of service offered by the Tier Two Build Alternative transit proposal with service frequency every 15 minutes.

Other phased opportunities include express bus service from the Elgin O'Hare corridor along IL 53 to Woodfield, shuttle service from the Schaumburg stop to Hanover Park, and express bus service from the proposed West Terminal site to Rosemont. Each of these extensions of service would provide an important transit link in the system to job centers, activity centers, or linkages to other transit facilities.

## Location of Transit Stations

In the Tier One, transit station locations were identified, although precise station placements and other details involving pedestrian access, parking, and intermodal connections were not determined at that time. In Tier Two, additional studies were conducted to define the details about station placement, parking and kiss-and-ride, pedestrian/bicycle access, and connection with other modes of travel - *Transit Station Location Refinement Memorandum*.

Transit stations were identified in Tier One at six locations: proposed Western Terminal, near Lively Boulevard, Hamilton Lakes, IL 53, Roselle Road, and near Schaumburg Metra station. Transit station locations were reviewed and refined in Tier Two resulting in changes at three locations.

Station relocations at the Lively Boulevard and Hamilton Lakes stations involved a minor shift to the west. In the case of the Hamilton Lakes station, the shift was more proximate to the center of activity, provided improved passenger access, and was closer to a parking structure planned for the area. For the Lively Boulevard station, the shift to the west improved access to planned parking. In both cases, pedestrian access would be provided from both the north and south sides of the project corridor.

The IL 53 station was originally sited to provide commuter access to and from the employment center to the south and the transfer of patrons coming from the west that desire to use the service routed north along IL 53 to Woodfield Mall. The original configuration included both a station and dedicated bus ramps from the median to access IL 53. The combined width of these facilities would measure over 150 feet. The sizable median dimension for station and ramps challenged cost-effective roadway design solutions in this area. The process of refining the roadway section in the vicinity found that a median width

of near 100 feet would be preferable. In discussions with the RTA, it was concluded that a median width of approximately 100 feet would provide a workable area for future transit infrastructure. Further, the agency preferred to defer the decision regarding either a station or ramps at IL 53, and revisit that decision later when both a transit provider and funding for transit service are identified in the Elgin O'Hare corridor - *Bus Rapid Transit Comparison Analysis - IL-53 (Rohlwing Road) Memorandum*.

### Transit Station Parking

The *Transit Station Location Refinement Memorandum* discusses the specifics of parking and station access for four of the five stations planned along the route, including near Wood Dale Road, Hamilton Lake's development, Roselle Road, and near the Schaumburg Metra station. At each of the transit stations, provisions for parking (ranging from 200 to 650 spaces) and bicycle and pedestrian access would be provided (see Table 1). Parking for a potential station at IL 53 is also shown in Table 1, but note that parking is relevant only if a station were developed. The parking area requirements and locations have been included in the project footprint for purposes of environmental clearance, with the understanding that all parking facilities and associated right-of-way acquisition would be the responsibility of the implementing transit agency. The parking requirements at the proposed West Terminal will be determined when more advanced site development information at the airport is known.

TABLE 1  
Transit Parking and Access

Location	Description	Parking Capacity	Pedestrian Access	Kiss & Ride Facility	Intersecting Service Stops
Schaumburg Metra	Re-build part of existing lot with two-level deck structure	650	Yes	Yes	Yes
Roselle Road	New surface lots as part of new retail development	200	Yes	Yes	Yes
IL 53 <sup>a</sup>	New surface lot	350	Yes	Yes	Yes <sup>b</sup>
Hamilton Lakes/Park Boulevard	Partial use of new multi-level parking structure built as part of adjacent commercial development	550	Yes	Yes	Yes
Wood Dale Road	Partial use of new multi-level parking structure built as part of adjacent commercial development	300	Yes	Yes	Yes
West Terminal	Parking requirements will be determined as proposed West Terminal complex develops further	NA <sup>c</sup>	Yes	Yes	Yes

<sup>a</sup> A station at this location is optional based on limited space for either a station only or access ramps to IL 53 only. The parking estimate would be provided only if a station is developed.

<sup>b</sup> No intersecting services operate at Meacham Road and the Elgin-O'Hare Expressway. Local circular services are proposed. When stop is re-located to IL 53 with the Tier Two Build Alternative, intersecting services would have stops at this location.

<sup>c</sup> Parking will be determined when more advanced site development information for O'Hare Airport is known.

### **Extended Transit Service – (North-South – East-West Connectivity)**

Refinements in Tier Two also examined extending transit service from Schaumburg to Hanover Park, express bus service from the Elgin O'Hare corridor along IL 53 to Woodfield Mall, and express bus service from the proposed West Terminal complex to the Rosemont CTA station. Tier Two studies investigated the extension of transit service to the Hanover Park Metra station from the Schaumburg Metra station (a distance of two miles) - *Service Extension to Hanover Park Memorandum*. Eleven alternate routes were examined between Hanover Park and Schaumburg for both BRT and LRT. The cost of the extended service was sizable, ranging from about \$43 million to over \$50 million, for the basic infrastructure (not including rolling stock). The travel time provided by the service would be approximately four minutes or represent about a four minute savings over alternate modes (i.e., shuttle bus in mixed traffic).

The high-type transit service (i.e., BRT or commuter rail) from Schaumburg to Hanover Park was deferred from further consideration for several reasons, including the high cost of transit service for a relatively small savings in travel time, and impacts to high quality wetlands, prairies, threatened/endangered species, and the West Branch DuPage River. However, the decision to defer the high-type service to Hanover Park does not preclude reconsideration of this service at a later date. In lieu of BRT/commuter rail service, bus shuttle service would be used to connect the Schaumburg Metra station to the Hanover Park Metra station. The study suggested that Hanover Park may wish to consider implementing an interim service to Schaumburg when the Elgin O'Hare transit system goes into service, and upgrading to one of the higher level options as the market demand develops and cost-benefits come into alignment.

On the east, express bus service was studied from the proposed West Terminal to the Rosemont CTA Blue Line station. This service is viewed as interim until such time that transit is extended across the airfield to the proposed West Terminal. As an interim service, it would provide connectivity for commuter and work trips between the project area and downtown Chicago and airport-related businesses. Alternative routes were examined around both the north and south ends of the O'Hare Airport. Routes to the north were found to be slower and provided less reliable service due to numerous signals and more out-of-direction travel. The route to the south was favored because of shorter travel times and the reliability of travel speeds. This route would use the south leg of the West Bypass corridor to Irving Park Road (IL 19), travel east on IL 19 to Mannheim Road, north on Mannheim Road to Balmoral Avenue, and then to the Rosemont CTA Blue Line station. The service would operate as express bus service between the proposed West Terminal and the Rosemont CTA Blue Line station with travel time of about 15 minutes. No special infrastructure requirements are anticipated for this service.

Express bus service is planned along IL 53 extending from the Elgin O'Hare corridor to the Woodfield Mall. The arterial route would include several stops at activity or job centers. In consideration of this service, north-south service along IL 53 and Meacham Road were considered. IL 53 was preferred because of its proximity to job centers and activity centers. Similar to the other express bus routes no special infrastructure requirements are anticipated other than bus stops.

### Transportation Hub

In Tier Two the location of a transit center or hub was evaluated further - *Proposed New West O'Hare Terminal Transit Facilities and Commuter Rail and High Speed Rail Analysis from the Milwaukee West Line to O'Hare New West Terminal Memorandum*. It was determined that the proposed West Terminal area was the optimal location to bring together the various transit modes. More remote locations were eliminated due to the difficulty of moving passengers between the transit modes and the proposed West Terminal. A distinct transit "hub area" in the proposed West Terminal or separate building directly adjacent to the air terminal was identified as optimal in order to accommodate the goals of the approach.

A preliminary site plan was developed bringing all the proposed transit modes directly to the proposed West Terminal area. As this arrangement was evaluated, several feasibility challenges were identified. An alternative arrangement was developed that located the rail lines and platforms to the west of the proposed West Terminal, with the remaining modes being brought directly to the air terminal area, allowing for direct mode transfers.

The proposed transit center at the proposed West Terminal would provide the interconnection between the various transit and non-transit modes. It will create a new centralized intermodal transit hub for the airport and surrounding communities in the area served by the EO-WB project.

### Conclusion

The goal of additional transit service and connections to other modes of transportation was highly regarded by stakeholders throughout the project area. Tier Two refinements advanced transit to a point that the east-west roadway component now has a reservation sized to accommodate most transit types. Further station locations have been reconciled, and again the roadway cross-section has been developed to accommodate the wider footprint required for stations. Additionally, extended bus express service to Hanover Park, Rosemont, and the Woodfield Mall are considered viable options either as interim or long-term services. Parking at stations has been addressed and appropriately sized to realistic demand levels. Additionally, bicycle/pedestrian access has been considered and a concept is available for follow on studies. Although, some cost information was developed during Tier Two, more work is required to determine the exact service type and the year of implementation before reliable cost estimates can be prepared. Thus, cost estimates have not been included pending further definition of the transit service. Similarly the operational requirements are best determined when a specific transit type has been identified; therefore this work has not advanced the operational characteristics of transit service.





## Chicago Metropolitan Agency for Planning

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May 14, 2012

Via first class & electronic mail

Mr. Ron Krall  
Illinois Department of Transportation (IDOT)  
201 West Center Court  
Schaumburg, Illinois 60196-1096

Dear Mr. Krall:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Elgin-O'Hare/West Bypass (EO-WB). The Chicago Metropolitan Agency for Planning (CMAP) would like to submit the following observations pertaining to the DEIS.

The Elgin-O'Hare/West Bypass project is included in GO TO 2040, the region's long-range comprehensive plan. The project is part of the plan's fiscally constrained list of transportation improvements and is conformed to the State's air quality plan. Three distinct projects are identified within this project: 1) a western expressway bypass of O'Hare Airport; 2) an extension of the Elgin-O'Hare Expressway from I-290/IL 53 to the Western O'Hare Bypass and West O'Hare Terminal; and 3) adding one lane in each direction—from four to six lanes total—on the existing Elgin O'Hare Expressway. All segments of the project were assumed to be tolled facilities.

### SOCIO-ECONOMIC FORECASTS

CMAP has worked very closely with the CH2M Hill and S.B. Friedman staff in preparing the analyses that appear in the DEIS. Friedman's approach and method was very practical and detailed and represents the kind of technical refinement at the project level that is desirable and should be supported. However, the corridor-level forecasts from GO TO 2040 do not appear anywhere in the document, even for comparative purposes.

1 We acknowledge the necessity to review and possibly revise forecasts with a market-driven forecasting approach when tolling or private investment may be a possibility. Correspondence from the consultant cited the need to "balance both market potential and local area municipality long range planning vision", and to "support local...economic and traffic concerns." Given that the forecasts used to develop GO TO 2040 were revised, an explicit comparison of the forecast differences between the DEIS and GO TO 2040 should be presented. We have noticed during our ongoing participation in

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1 | the travel modeling for the project a significant increase in forecast jobs in the corridor, accompanied by a decline in forecast households. The Housing section below provides greater detail on this issue.

### **ECONOMIC GROWTH**

2 | The Draft EIS effectively communicates the potential for new economic growth that the EO-WB project could create. The discussion of this issue in Section 3.2, Economic Conditions, includes thorough analysis and clear conclusions that demonstrate the project's positive impact. In particular, page 3-30 states that the project "would enhance redevelopment potential of underutilized properties, stimulate land use change, and create potential development and redevelopment opportunities throughout the project area." A similar conclusion is stated on page 3-31, which notes that the EO-WB project "is projected to fundamentally change the competitive positions of the area and to attract corporate offices, hotels, modern industrial/business parks, and retail uses."

Further, the long-term economic impacts estimated in Table 3-15 demonstrate that the EO-WB project will stimulate new development of a type that benefits the region's long-term economic performance. The new development is projected to include significant new growth in office space (nearly 7 million square feet) and industrial space (over 1.2 million square feet), with positive impacts on job creation. The focus of the DEIS on these types of land uses – rather than retail, which yields more positive local, fiscal impacts, but fewer regional economic benefits – is commendable.

### **HOUSING**

However, one significant gap in the approach to new development in the DEIS is its limited attention to new residential development. There is little new housing considered within the EO-WB corridor; according to Table 3-15, the land use changes caused by the project will lead to 41,000 additional jobs in the corridor but only 540 new housing units.

3 | Imbalances between jobs and housing create a number of problems for the region, as documented by CMAP in the 2008 [Jobs-Housing Balance snapshot report](#), one of the products that informed the development of GO TO 2040. The EO-WB corridor already has a high ratio of jobs to housing, meaning that it is a net importer of workers from other parts of the region. Providing large numbers of new jobs without adequate housing will exacerbate this situation, requiring even more workers to commute long distances to reach jobs in the corridor, and placing greater strain on the transportation systems that connect to the EO-WB project.

CMAP's snapshot report makes several recommendations, one of which is to plan for additional housing choices near job centers like the EO-WB corridor – not necessarily in the immediate roadway corridor, but in the surrounding areas. The new development opportunities created by the EO-WB project provide an excellent opportunity to achieve this recommendation, but currently this potential is missed by the land use development assumptions of the DEIS.

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**INFILL DEVELOPMENT**

One of the recommendations of the GO TO 2040 plan is to pursue infill development opportunities when available. The plan estimated that one-half of the region’s growth – both residential and non-residential – could be provided on infill sites by 2040, even without assuming increases in development density. CMAP defines infill to mean growth within or immediately adjacent to existing municipalities, meaning that all of the new development created by the EO-WB project is considered infill by CMAP’s definition. Thus, the significant development in this area that is described in Section 3.2 is fully supported by GO TO 2040.

3 This discussion of infill brings to light a contradiction in the treatment of population and employment growth in the corridor. Page 3-2 describes historic development patterns, which according to the Draft EIS, indicate that “Cook and DuPage Counties have reached maturity in terms of population growth.” However, Cook and DuPage Counties have also reached maturity in terms of job growth; over time, employment growth has followed very similar trends as population growth.

As the analysis of future development potential makes clear, it is possible, and desirable, to create significant job growth in the communities in the corridor through infill development. This is a break from historical trends. It is equally possible to create significant household and population growth through infill development, despite the statements on page 3-2 which imply that this is unlikely due to historical trends.

**COMPREHENSIVE PLAN UPDATES**

The conclusion of Section 3.2, on page 3-36 and 3-37, notes that “the communities in the project area have the ability through their local planning powers to address new development induced by better transportation with thoughtful planning solutions.” The DEIS further states that “new development pressures may cause some communities to revisit their land use plans, goals, and ordinances...[and/or]...collaborate on a collective action that would produce a unified approach to managing induced growth through the area.” Following this, Section 3.3 provides a useful discussion of the state of local planning documents.

4 To implement the recommendations of GO TO 2040, CMAP has begun to offer assistance to local governments for planning projects that meet local goals and also advance GO TO 2040. Communities in the EO-WB corridor may wish to request CMAP’s assistance on the planning projects noted above; the next call for local planning projects begins on May 9, with applications due on August 1. Multi-jurisdictional applications receive priority in the application process. IDOT and ISTHA may wish to bring this application opportunity to the attention of communities in the corridor, as this may be a good opportunity to not only plan for the projected economic growth, but also address the need for proactive planning for residential development as well.

**ENVIRONMENTAL**

5 The Elgin O’Hare – West Bypass (EO-WB) Build Alternative will create additional roadway surface in a part of the region that already features impaired or degraded streams and shallow

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groundwater quality that is being degraded by a persistent trend in increasing chloride concentration. The DEIS states, "The intent of the EO-WB project would be to maintain/improve the quality and quantity of aquatic resources identified in these plans, as applicable." However, the DEIS does not make a clear, unequivocal commitment to implement state-of-the-art water quality protection practices.

The study indicates that some existing driveways and parking spaces will be eliminated by the new project corridor. This presents an opportunity for the project sponsors to compensate with new permeable surfaces and other principles of low-impact development to help mitigate the effects of additional impervious surface added to the region with the new roadway.

Of particular concern is the expected application of deicing material – road salts in particular – to 25 miles of new roadway surface. While best management practices (BMPs) are promised, chloride loads can only increase in an area where chlorides are already identified as a cause of designated-use impairment. The author's conclusion that BMPs will minimize impacts for this pollutant and others (e.g. metals) has not been clearly substantiated.

5 For example, in the subsection titled, Surface Runoff, page 3-125 and found within section 3.10.2.3 / Maintenance Impacts to Surface Waters, the authors write, "Studies of the effects of sodium chloride on fish, aquatic invertebrates, and aquatic plants, including acute and chronic toxicity, indicate that salt does not have substantial harmful effects on aquatic biota in large or flowing bodies of water, where dilution takes place quickly (Jones and Jeffrey, 1992)." While this may be true as stated, the streams that will be affected by the EO-WB project are neither large nor (high) flowing bodies of water. The streams in the project area that will be impacted are relatively small streams with relatively small drainage basins above their impact points.

The study points out that the project corridor contains a combination of shallow groundwater recharge areas which feature limited recharge due to their clay soils and that research shows trends in increasing chloride concentrations in shallow wells throughout most of the Chicago region. Despite the stated intention that BMPs will, "...focus on capturing and retaining potential contaminants to prevent them from exiting the project corridor as surface or groundwater flow." (3-142), the authors fail to reconcile the expected increase in road salt application associated with the project corridor and their conclusion that, "... it is expected that the potential for groundwater migration of contaminants will be minimal." (pg. 3-142)

While the DEIS focuses solely on immediate and local impacts, the fact is there have been numerous other roadway and development projects in the study area during the last century resulting in cumulative impacts on regional wetlands, floodplains, and other natural communities. These impacts have been deleterious to water quality, responsible for excessive flood losses (particularly in the Des Plaines River Basin), and resulted in the loss of natural areas and attendant biodiversity. In this context, the EO-WB project impacts will not minimal, but additive to a growing cumulative impact.

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#### RECOMMENDATIONS

CMAP requests that several modifications to the Draft EIS be considered in response to the above statements. These are listed below:

- Corridor level GO TO 2040 forecasts should be included in the DEIS at a minimum permitting a comparative analysis with the DEIS forecasts.
- On page 3-2, the text should note that additional population and household growth in the corridor is possible due to the opportunity for infill development created by the EO-WB project.
- Pages 3-30 and 3-31 should include some discussion of housing. This does not necessitate changing the economic forecasts. Instead, a note should be added in the text noting that limited new housing is assumed in the projections, and stating that planning for additional residential options in the corridor would be desirable to avoid worsening the region's jobs-housing balance.
- Pages 3-36 and 3-37 should also mention housing. This is an appropriate location to note that the communities in the corridor may wish to plan for additional residential opportunities.
- On a minor note, there is a formatting problem with Table 3-16; some of the rows near the bottom of the table appear to be misaligned.
- IDOT and ISTHA may wish to assist local governments in the corridor with requesting technical assistance from CMAP for multi-jurisdictional planning in the corridor. (This is not a comment that requires any modification to the DEIS.)
- The DEIS should include a firm commitment to implementing state-of-the-art BMPs where possible to minimize impacts
- Finally, there should be a commitment that the EO-WB will be maintained utilizing state-of-the-art deicing technologies that minimize the opportunity for road salt to enter ground or surface waters.

Thank you for the opportunity to comment on the DEIS. We look forward to our continued work on this project.

Sincerely,



Donald P. Kopec  
 Deputy Executive Director-Planning & Programming

DPK/stk