



Metropolitan Planning Council

March 8, 2013

Chicago Metropolitan Agency for Planning
 Transportation Committee
 ATTN: PLAN and TIP Amendment
 233 S. Wacker Dr., Suite 800
 Chicago, IL, 60606

Governor Quinn and the Illinois Dept. of Transportation (IDOT) has requested that the Chicago Metropolitan Agency for Planning (CMAP) amend metropolitan Chicago's GO TO 2040 comprehensive regional plan to include the proposed Circle Interchange improvements as a fiscally constrained project in the region's transportation plan, a prerequisite to receive federal funding. MPC objects to the inclusion of the Circle Interchange in the plan.

MPC considers the GO TO 2040 plan to be a living document that should recognize and adapt to the region's dynamic transportation needs and consider appropriate amendments. The process for considering those amendments should mimic that which all projects followed during the five-year planning effort that resulted in GO TO 2040. Working together, the seven counties and 284 communities that make up the CMAP region established clearly defined strategies to influence future growth. Projects were considered for inclusion in the plan based on how well they implemented the regional vision, and subsequently were prioritized based on economic, congestion, accessibility, and environmental justice performance measures to select the projects that best advanced the region's goals within our limited resources. The process was fair, transparent, based on the projects' merits and reflective of CMAP's emphasis on investments that achieve the best results.

MPC strongly objects to the Circle Interchange project being proposed for inclusion in the region's transportation plan, for two reasons: first, the project was not vetted through the established

prioritization process; and second, newly available data demonstrates that it will not provide results sufficient to merit the projected \$410 million cost. MPC conducted an initial comparison with the 52 regional transportation projects that advanced to the evaluation

When compared to the other 52 projects analyzed as part of GOTO 2040's planning process, the circle interchange ranked near the bottom on all but two measurements where it ranked in the middle.

Circle Interchange	Rank out of 52 projects
Increase jobs in Region	47
Increase total Income in Region	48
Increase gross Regional Product	48
Reduce hours of Congestion	26
Reduce avg Travel Time Auto	28
Reduce avg Travel Time Transit	50
Increase total Jobs accessible within 75 minutes by Transit	32*
Increase total trips transit	34
Reduce annual emissions of CO2 Equivalent	50

*23 projects do not change the number of jobs accessible within 75 minutes by Transit

stage during the GO TO 2040 process, the Circle Interchange project ranks low (see chart). Taxpayers deserve data-driven decisions, not sudden pronouncements for a project lacking a

- | | |
|---|--|
| Board of Governors | Executive Advisors |
| Joseph A. Gregoire •
Chair | Laurent Auguste
Veolia Water Americas |
| Ann M. Drake •
Vice Chair | Raymond Bachant
Bombardier Transportation |
| Jesse H. Ruiz •
Vice Chair | Carol L. Bernick
Polished Nickel Capital Management |
| Paul C. Carlisle •
Vice Chair—Development | Lawrence T. Borgard
Integritys Energy Group |
| James P. Stirling •
Vice Chair—Development | Marsha Cruzan
U.S. Bank |
| Kathy Hopinkah Hannan •
Secretary | Craig J. Duchossois
The Duchossois Group, Inc |
| Lisa Snow •
Treasurer | Colin Dyer
Jones Lang LaSalle |
| John M. McDonough •
General Counsel | Mitchell S. Feiger
MB Financial Bank, N.A. |
| King Harris •
Past Chair | Paul S. Fisher
Centerpoint Properties |
| J. Tyler Anthony | Joseph A. Gregoire
PNC |
| Rita R. Athas | Stephen J. Hagge
AptarGroup, Inc. |
| Karen M. Atwood | Patricia Hemingway Hall
Health Care Service Corp. |
| John W. Baird | Edward R. Hamberger
Association of American Railroads |
| Kyle Barnett | Eric Hirschfield
Goldman Sachs |
| Lawrence T. Borgard | Frederick A. Krehbiel
Molex Incorporated |
| Byron Brazier | Matthew Levin
Aon Corporation |
| Carole L. Brown | Raymond J. Lewis
Ventas, Inc. |
| Todd C. Brown • | David J. Neithercut
Equity Residential |
| John A. Buck | Robert L. Parkinson, Jr.
Baxter International Inc. |
| Christopher B. Burke | J. Marshall Peck
InterPark Holdings LLC |
| Nora Moreno Cargie | Thomas Pontarelli
CNA |
| Ellen Carnahan | Judith C. Rice
BMO Harris Bank |
| Pedro J. Cevallos-Candau | Larry D. Richman
The PrivateBank |
| Lester Crown | Jim L. Stanley
NIPSCO (NISource) |
| Jon B. DeVries | Robert A. Sullivan
Fifth Third Bank |
| Sidney R. Dillard | Frederick H. Waddell
Northern Trust |
| Derek Douglas | Edward J. Wehmer
Wintrust Financial Corporation |
| Robert V. Fitzsimmons • | |
| James C. Franczek, Jr. • | |
| John S. Gates, Jr. | |
| Linda Goodman | |
| Jacques N. Gordon, Ph.D. • | |
| M. Hill Hammock • | |
| David Hiller | |
| Lawrence I Ilowe | |
| Bernard Loyd | |
| Mary K. Ludgin | |
| Peter C. Malecek | |
| James E. Mann • | |
| Lee M. Mitchell • | |
| Paul E. Nowicki | |
| Robert T. O'Brien | |
| J. Scot Pepper • | |
| Stephen M. Porras | |
| Quintin E. Primo, III | |
| Jorge Ramirez | |
| George A. Ranney, Jr. • | |
| Matthew R. Reilein | |
| Kevin C. Richardson | |
| Jean Rudd | |
| Martin Stern | |
| .Bruce W. Taylor | |
| Michael A. Thomas | |
| Mary White Vasys | |
| Paula Wolff • | |
| President | |
| MarySue Barrett • | |
| Executive Committee • | |

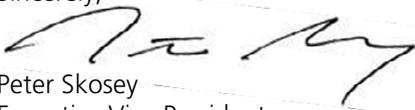
comprehensive assessment, which will displace other worthy investments, and to which the State of Illinois has already committed \$40 million to engineering and planning.

The Federal Highway Administration has documented -- and we all know from firsthand experience -- the Circle Interchange is the nation's "most heavily congested freight bottleneck." But we also know from CMAP's January 2013 evaluation that this project will do little to relieve congestion or spur economic growth. CMAP's analysis finds expanding the interchange is projected to convert 1,000 trips *from* transit *to* driving and *increase* carbon dioxide emissions by 39,000 metric tons per year. Further, on a system wide basis, drivers in the region commuting to work will save only 1.2 seconds per trip if the project is built -- or just 1,000 total hours of congestion daily. In contrast, the I-290 managed lanes project will save 22,676 hours of congestion system wide. Further, the Circle Interchange project is expected to add \$436,000 to the Gross Regional Product, while the I-290 project will add approximately \$103 million.

An MPC analysis of the 52 projects evaluated under GO TO 2040 generated similar results: other projects in the queue do more to relieve congestion and grow the economy than the Circle Interchange. If the region chooses to allocate hundreds of millions of dollars to a transportation project, those dollars should have the greatest impact. These concerns could have been publically vetted if the Circle Interchange project went through the same transparent process other capital improvements have gone through prior to the state announcing it as a priority.

The Chicagoland region has united around its transportation priorities. Unilaterally adding a project to this agreed-upon plan demeans the thorough effort so many put into GO TO 2040 and sends a cynical message to the public that criteria and transparency do not matter but political clout does. The public deserves to know that their dollars are being spent wisely, effectively, and according to a well-thought-out plan. We simply cannot afford to arbitrarily allocate scarce funds to a project that hasn't been fully evaluated. MPC strongly believes that unless a project proves it can deliver multiple positive results to the region and is evaluated against the transparent and accountable criteria that CMAP has established for the region, it should not be included in the regional transportation plan.

Sincerely,



Peter Skosey
Executive Vice President
Metropolitan Planning Council