

DISPOSITION OF COMMENTS

Willow Road, Illinois Route 43 (Waukegan Road) to Interstate 94 (Edens Expressway)
Draft Alternative Analysis Summary Report, Volumes 1 & 2 (March 10, 2011)

Comments Submitted by: Village of Northfield/KLOA, Inc (August 31, 2011)

Responses Prepared by: IDOT/TranSystems
Revised November 4, 2011

Page 1 – First Disposition

Comment:

While we understand that the National Environmental Policy Act (NEPA) studies utilize an alternative process that “starts broadly and adds details as the process advances,” it is KLOA, Inc.’s opinion that only evaluating one roadway section was too broad of an analysis. Evaluating the entire two-lane section of Willow Road (Sunset Ridge to Old Willow Road/Northfield Road) is appropriate for the Round #1 analysis considering (1) the entire two-lane section will be the most sensitive to any changes along Willow Road and (2) it only includes one more roadway section.

Disposition:

As previously stated, the Sunset Ridge Road intersection and the Sunset Ridge Road to Wagner Road segment were chosen because they were the most sensitive to change. Using this intersection and segment allowed the ability to provide a reasonable evaluation for all of the alternatives and, if an alternative provided any benefit to safety or mobility on Willow Road, it would be studied further in the Round #2 evaluation which analyzed all intersections and segments.

Page 2 – First Disposition

Comment:

As we have indicated, it is KLOA, Inc.’s opinion that only evaluating one roadway section and one intersection was too broad of an analysis. It is our contention that travel times provide a more comprehensive measure of mobility and effectiveness (level of congestion) along the entire corridor rather than the operation of one intersection or roadway section. Further, as will be discussed later, we disagree with IDOT’s claim that “the analysis for Round #1 was sufficient to conclude that the regional alternatives were not sufficient in addressing the transportation needs along Willow Road.”

Disposition:

As noted in our previous disposition to comments travel time studies are not necessary to calibrate the HCS. The tools used and data collected are the professional industry standards and state of the practice, and are a reliable indication of congestion. In addition, the Round #2 evaluation, which included all of the local alternatives, analyzed all intersections and segments along the corridor.

Page 2 – Second Disposition

Comment:

While we understand that the NEPA studies utilize an alternative process that “starts broadly and adds details as the process advances,” it is our opinion that only evaluating one intersection was too broad. Evaluating the intersections along the entire two-lane section of Willow Road is appropriate for the Round #1 analysis

considering (1) it only includes one more intersection and (2) both intersections will be the most sensitive to any changes along Willow Road.

We disagree with IDOT's assertion that the "Willow Road/Sunset Ridge Road intersection is the most sensitive (and thus used for comparison purposes) since it handles the most traffic within the two lane section." The IDOT's Context Sensitive Solution Detailed Guidelines for Practice indicate that traffic volumes/operations are only one of several criteria that should be evaluated. Given that the Willow Road/Wagner Road intersection is located within the heart of the Village and serves Middlefork Primary School, Willow Park and the Northfield Community Center, it is KLOA, Inc.'s opinion that this intersection is as critical and as sensitive to change as the Willow Road/Sunset Ridge Road.

Disposition:

As previously noted we followed an approach defined by NEPA (National Environmental Policy Act) that for large geographic areas, or many alternatives, uses an alternatives evaluation process that starts broadly and adds detail as the process advances. This approach which was also outlined at the November 2010 and January 2011 CAG meetings. The Willow Road at Sunset Ridge Road intersection was selected for Round #1 analysis because it would be the most sensitive to changes in traffic volumes, as it handles the most traffic within the two lane section. In Round #2, all of the intersections were analyzed.

The Village's reference to IDOT's Context Sensitive Solution policies as a reason to analyze the Wagner Road intersection is an "apples to oranges" comparison, in the context of a NEPA Purpose and Need discussion. Per NEPA, a Purpose and Need includes an analysis of transportation factors, rather than the adjoining land uses noted in your comments. Nonetheless, the selection of the Sunset Ridge Road intersection for the Round #1 analysis, by the Village's definition, also addresses context, given that Sunset Ridge School is in closer proximity to Willow Road.

Page 3 – First Disposition

Comment:

IDOT indicates that "one of the goals of Round #1 was to determine if the Regional Alternatives would eliminate the need for improvements along Willow Road." It is KLOA, Inc.'s opinion that the Round #1 analysis is flawed as it did not examine whether the Regional Alternatives improvements have an impact on the level of improvements required along Willow Road not if they would "eliminate the need for improvements." Given the current physical and operating conditions of Willow Road, it has been clear that the Regional Alternatives alone would not resolve the issues along Willow Road and that some level of improvements are required with or without the Regional Alternatives. The alternative analysis should have examined the impact the Regional Alternatives have on the corridor and whether they reduce the level of improvements along Willow Road. Therefore, the Regional Alternatives should not have been considered mutually exclusive, but should have been considered in tandem with some level of improvement along Willow Road.

Disposition:

As you know, there was an early stakeholder perception that a significant portion of Willow Road traffic was "cut through," which was further perceived to be caused by a lack of improvements to other roadways. Through IDOT's comprehensive analysis, which included the use of a travel demand model, it was documented that the regional alternatives would not address the problems on Willow Road, particularly with respect to safety or mobility. The Average Daily Traffic (ADT) volume changes on Willow Road that resulted from the Regional Alternatives were not of sufficient magnitude to demonstrate any substantive benefit to the operation of the intersections along Willow Road as can be seen in the results of the Round #1 analysis. If any of the Regional

Alternatives had shown any benefit, further studies or combinations of alternatives would have been investigated in Round #2.

Page 3 – Third Disposition

Comment:

Please see responses for Page 1 - First Disposition and Page 2 - Second Disposition.

Disposition:

See previous response to first and second dispositions (on page 2 of this document).

Page 3 – Fourth Disposition

Comment:

Please see responses for Page 1 - First Disposition and Page 2 - Second Disposition. Given that the Willow Road/Wagner Road intersection is located within the heart of the Village and serves Middlefork Primary School, Willow Park and the Northfield Community Center, it is KLOA, Inc.'s opinion that the intersection is as critical and as sensitive to change along Willow Road, particularly the pedestrian crash frequency, as the Willow Road/Sunset Ridge Road intersection.

Disposition:

See previous response to first and second dispositions (on page 2 of this document).

Page 3 – Fifth Disposition

Comment:

Please see responses for Page 3 - First Disposition. We disagree that the IDOT and Regional Alternatives were not effective as the alternative analysis did not examine a combination of Regional Alternatives with local improvements.

Disposition:

See previous response to Page 3 - first disposition (on page 3 of this document).

Page 4 – First Disposition

Comment:

Please see responses for Page 3 - First Disposition. We disagree that the IDOT and Regional Alternatives were not effective as the alternative analysis did not examine a combination of Regional Alternatives with local improvements.

Disposition:

See previous response to Page 3 - first disposition (on page 3 of this document).

Page 4 – Second Disposition

Comment:

As will be discussed later, KLOA, Inc. still questions the validity of the projected traffic volumes for the various alternatives. Nevertheless, in addition to traffic volumes, the intersection design is also a key input for the HSM analysis. This is shown in the fact that the no build alternative (Alternative 1) and Willow Road two-lane with median alternatives (Alternatives 2 and 3) have similar volume. However, the improvements proposed as part of the two-lane with median alternatives have a significant reduction in the crash frequency over the no build alternative. Therefore, it can be seen that a combination of Regional and Local Alternatives would have a significant reduction in the crash frequency.

Disposition:

The Average Daily Traffic (ADT) volume changes on Willow Road that resulted from the Regional Alternatives were not of sufficient magnitude to demonstrate any substantive benefit to the operation of the intersections along Willow Road. The conclusion of Round #1 was that the local Willow Road Alternatives were better able to address the project needs and that those same alternatives involved comparatively less impacts and overall construction costs. If any of the Regional Alternatives had shown any benefit, further studies or combinations of alternatives would have been investigated in Round #2

Page 4 – Fourth Disposition

Comment:

Please see responses for Page 2 – First Disposition.

Disposition:

See previous response to Page 2 - first disposition (on page 2 of this document).

Pages 5, 6 and 7 – Dispositions on the Projected Traffic Volumes

Comment: *(Individual dispositions provided for each check point below)*

IDOT general response to the various comments is that “the change in traffic is due to the changes in network configurations and the associated redistribution of travel across the network.” However, IDOT has only provided the projected traffic volumes along the Willow Road corridor and did not provide traffic volumes along the other east-west roadways. Consequently, it is not possible to examine how the traffic is redistributed across the network with the various alternatives. Therefore, until traffic projections are provided for the other primary east-west roadways within the network, KLOA, Inc. still questions the validity of the traffic projections and the following IDOT conclusion:

“The key issue is that the changes in the volumes were very minor for most of the alternatives, and therefore have no substantive effect upon the performance of Willow Road for those alternatives.”

Disposition:

Regardless of the extent of any redistribution of travel across the network, the focus of the Round #1 evaluation was on how each alternative affected traffic volumes on Willow Road itself, since the purpose of the project is to address the needs for Willow Road, not the needs of the regional roadway network.

Page 7 – Second Disposition

Comment:

Please see responses for Page 3 – First Disposition.

Disposition:

See previous response to Page 3 - first disposition (on page 3 of this document).

Page 7 – Third Disposition

Comment:

Please see responses for Page 3 – First Disposition.

Disposition:

See previous response to Page 3 - first disposition (on page 3 of this document).

Pages 8 and 9 – Dispositions on the Capacity Analyses

Comment:

As we have indicated, it is KLOA, Inc.'s opinion that the alternative analysis is flawed as the Regional Alternatives were evaluated as mutually exclusive options and were not evaluated in combination with any local improvements. Each of the Regional Alternatives was evaluated assuming no improvements along Willow Road or the no-build condition (Alternative 1). As is expected, under this mutually exclusive analysis, the Local Alternatives have better results than the Regional Alternatives. The alternative analysis should have examined the impact the Regional Alternatives have on the corridor and whether they reduce the level of improvements along Willow Road.

Disposition:

As you know, there was an early stakeholder perception that a significant portion of Willow Road traffic was "cut through," which was further perceived to be caused by a lack of improvements to other roadways. Through IDOT's comprehensive analysis, which included the use of a travel demand model, it was documented that the regional alternatives would not address the problems on Willow Road, particularly with respect to safety and mobility. As noted previously, the volume changes on Willow Road that resulted from the Regional Alternatives were not of sufficient magnitude to demonstrate any substantive benefit to the operation of the intersections along Willow Road. The conclusion of Round #1 was that the local Willow Road Alternatives were better able to address the project needs and that those same alternatives involved comparatively less impacts and overall construction costs. If any of the Regional Alternatives had shown any benefit, further studies or combinations of alternatives would have been investigated in Round #2.

Page 10 - First Disposition

Comment:

The IDOT conclusion that the "regional build alternatives did not provide any improvements to the facility condition and the design of Willow Road which is 60 years old" is not accurate as the Regional Alternatives did not include any improvements to Willow Road. As such, it was not possible for the Regional Alternatives to provide any improvements to the facility condition and the design of Willow Road. IDOT indicated in the disposition that "it was important to first know how they (regional alternatives) independently affect the performance along Willow Road and determine if they are an effective solution on their own merit to eliminate any need to do anything along Willow Road." If the primary purpose of the alternative analysis was to evaluate performance along Willow Road, why was "facility conditions" even considered as a criteria, particularly when the Regional Alternatives were considered without improvements to Willow Road? Further, given the physical and operating conditions along Willow Road, it was a given that the Regional Alternatives would not be an "effective solution on their own merit to eliminate any need to do anything along Willow Road." The alternative analysis should have examined the impact the Regional Alternatives have on the corridor and whether they reduce the level of improvements required along Willow Road.

Disposition:

The analysis did examine the impact on the Willow Road corridor. As you know, there was an early stakeholder perception that a significant portion of Willow Road traffic was "cut through," which was further perceived to be caused by a lack of improvements to other roadways. Through IDOT's comprehensive analysis, which included the use of a travel demand model, it was documented that the regional alternatives would not address the problems on Willow Road, particularly with respect to safety or mobility. The Average Daily Traffic (ADT) volume changes on Willow Road that resulted from the Regional Alternatives were not of sufficient magnitude to demonstrate any substantive benefit to the operation of the intersections along Willow Road as can be seen in the results of the Round #1 analysis. If any of the Regional Alternatives had shown any benefit, further studies or combinations of alternatives would have been investigated in Round #2.

Furthermore, as noted in previous dispositions, even if the regional alternatives had been combined with some local "facility condition" improvement on Willow Road, the result would be an alternative that has substantially greater impacts and costs, while not addressing mobility and safety on Willow Road, from IL 43 to I-94. Such an alternative would not have advanced in the evaluation process due to its poor performance, and substantially higher impacts/costs.

Page 10 - Second Disposition and Page 11 First Disposition

Comment:

The IDOT conclusions that the Regional Alternatives (1) "involve the most impacts for displacements and property acquisition" and (2) are "more costly than the Willow Road Alternatives" are flawed as the report does not consider the benefits that the Regional Alternatives provides to the other roadways in the region. One would expect greater impacts/costs from the Regional Alternatives as they are regional improvements as opposed to local improvements. IDOT indicated in the disposition that "the Regional Alternatives were studie(d) based on how they would address transportation needs along Willow Road." If the primary purpose of the alternative analysis was to evaluate performance along Willow Road, why was "property displacement/acquisition" and

Disposition of Alternatives Analysis Comments

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"construction costs" even considered as a criteria, particularly when the impacts/costs of the Regional Alternatives were solely assigned to the Willow Road project? The alternative analysis should have examined the impact the Regional Alternatives have on the corridor and whether they reduce the level of improvements required along Willow Road.

Disposition:

The Village comments continue to advocate a study of other needs on other roadways. As you know, the Willow Road study is addressing congestion, safety, and facility condition/design of Willow Road, from IL 43 to I-94. The Regional Alternatives did not demonstrate any substantive benefit to the transportation needs along Willow Road. The initial flaw analysis was completed to supplement the purpose and need screening and further define the features of each of the alternatives at an early stage. As noted previously, the conclusion of Round #1 was that the local Willow Road Alternatives were better able to address the project needs. As an added piece of information, those same alternatives involved comparatively less impacts and overall construction costs. If any of the Regional Alternatives had shown any benefit to the transportation needs, further studies or combinations of alternatives would have been investigated in Round #2.