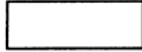




Chicago Area Transportation Study



To: CATS Policy Committee
From: Patricia Berry, Acting Deputy for Programming
Date: April 22, 2005
Subject: Public Comments on Proposed Revision to the Metropolitan Planning Area Boundary

The following is a summary of the comments received on the proposed revision to the Metropolitan Planning Area (MPA) boundary and staff notes on those comments. Six comments were received. Copies of the comments are attached.

Kane County

Kane County wrote in support of the proposed revisions.

Jim Fisher (two comments)

Mr. Fisher supported including Kendall County in the MPA, but thought it premature to include any of Grundy County in the MPA. He also thought that Lake County, Indiana should be included in the MPA.

- Aux Sable Township must be included in the MPA because it is now part of the urbanized area. The choices available are to include only Aux Sable Township, to include Aux Sable and Goose Lake Townships (the latter being in the nonattainment area), or to include all of Grundy County. In consultation with Grundy County, the decision was made to include only Aux Sable Township.
- Lake County, Indiana is currently in the Northwest Indiana MPA. The Northwestern Indiana Regional Planning Commission (NIRPC) is a member of the CATS Work Program Committee. In addition, CATS is a member of NIRPC's Transportation Policy Committee.

Nathan Darga

Mr. Darga supported the proposed boundary revision. He also recommended that the Northeastern Illinois Planning Commission (NIPC) and IDOT District 1 revise their boundaries to match the proposed MPA boundary.

- The recommendation was also forwarded to NIPC staff for their consideration. Their preliminary response is, "NIPC staff believes the expansion of the metropolitan planning boundary makes good planning sense. NIPC is in the process of exploring the possibility. There are a number of issues that would need to be addressed including legislative concerns."
- The recommendation was also forwarded to IDOT for their consideration. A decision to change district boundaries would have to be made by the Secretary of Transportation in consultation with the Governor's office. A number of factors would have to be considered before such a change could be made, including staffing and funding distribution.

Center for Neighborhood Technology

The Center for Neighborhood Technology recommended that the MPA boundary be changed in coordination with boundary changes for NIPC and the Regional Transportation Authority (RTA).

- The MPA boundary must, by federal regulation, be changed to reflect the urbanized area as determined by the 2000 Census. It is not possible to wait for legislative action on other planning-related boundaries before changing the federally regulated MPA.

In addition, CNT criticized the information provided in conjunction with the MPA public comment period. Their criticisms are:

1. It is disingenuous to suggest that NIPC and the RTA review their boundaries, since their boundaries are defined by statute, whereas CATS "does not have statutory authority."
 - This issue was addressed at the outset of the MPA discussions and was covered in materials posted on the CATS web site. The section quoted by CNT begins, "State legislation would be necessary to adjust the boundaries of either the RTA or NIPC." Clearly, the answer recognizes the constraints faced by other agencies.
2. The proposal does not address the "imbalance in the CATS Policy Committee," indicating a concern that membership is not proportional to population.
 - The CATS Policy Committee has reviewed this issue several times and has determined that its current membership is appropriate to its mission. The membership of the Policy Committee has been found to fully meet federal requirements during certification reviews.
3. "Discretionary dollars" (e.g., CMAQ and UWP funds) will be shifted from the current MPA to the new areas, which have little population.
 - CMAQ and UWP funds are not distributed on a formulaic basis throughout the region, but are programmed on a competitive basis, in

- which the merits of a proposal determine its chances of receiving funds. In addition, CMAQ funds may only be used in nonattainment areas or outside a nonattainment area if the project benefits the nonattainment area. In the past, the CMAQ Project Selection Committee has chosen not to fund projects outside the nonattainment area.
4. Kendall County has \$42 million “discretionary dollars” programmed in the current TIP, which appears to be a higher per capita ratio than the rest of the region.
 - Kendall County’s per capita spending in the current TIP is higher than the region-wide average. An equal distribution of per capita spending by County is not presently a criterion for program development.
 5. Including Kendall County in the planning region for NIPC will present “formidable” costs.
 - The memorandum cited for this statement is from 1997 and the costs are cited according to different bases. NIPC staff have been contacted to clarify and update these estimates.

Northeastern Illinois Planning Commission

The Northeastern Illinois Planning Commission stated that staff believes the boundary revisions are reasonable, but identified concerns related to regional planning in Kendall County. These can be summarized as follows: 1) Kendall County should produce a 2040 vision that is consistent with NIPC’s Framework Plan, 2) NIPC’s data and staff resources at present are insufficient to support regional planning in Kendall.

- CATS has clarified with the federal consultation team that, for certification and regulatory purpose, using currently available planning assumptions from Kendall County will be suitable for RTP and conformity purposes. Nevertheless, the long-term objective should be that the planning assumptions and data resources will be developed in a consistent manner.

County of Kane

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KAREN McCONNAUGHAY
Chairman

OFFICE OF COUNTY BOARD

Kane County Government Center
719 Batavia Avenue
Geneva, Illinois 60134

Telephone: 630-232-5930
Fax: 630-232-9188
kmcconnaughay@kanecoboard.org

March 30, 2005

Chicago Area Transportation Study
Attn: Public Comments
300 West Adams Street
Chicago, IL 60606

Dear Sirs:

Thank you for the opportunity to make comments on the proposed FY 2005-2009 Transportation Improvement Program (TIP) and the proposed change to the CATS Metropolitan Planning Area (MPA) boundary.

Kane County has participated fully in the development of the TIP and the discussions regarding the proposed changes to the MPA boundary. We support both the proposed TIP and the proposed MPA boundary change. Considering the current development trends, the inclusion of Kendall County in the MPA is a logical expansion that will foster better communication and cooperative planning for the region.

On behalf of the Kane County Board, I pledge our continued participation and support of these and other important regional transportation planning activities.

Sincerely,



Karen McConnaughay
Chairman, Kane County Board

Darga 050320.txt

From: Tom Murtha [publiccomments@mail.catsmpo.com]
Sent: Tuesday, March 29, 2005 12:46 PM
To: rpatronsky@catsmpo.com
Subject: FWD: MPA boundary

----- Original Message -----

From: Nathan Darga <nadarga@yahoo.com>
Date: Sun, 20 Mar 2005 11:32:13 -0800 (PST)

Good idea and probably overdue. It would be great if NIPC and IDOT (district 1) would also change their boundaries so you all could be on the same page.

.....
Nathan Darga
nadarga@yahoo.com
(217) 840-5918

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----- Sent via the WebMail
system at mail.catsmpo.com

[E-mail scanned for viruses]

Fisher 050329.txt

From: Tom Murtha [publiccomments@mail.catsmpo.com]
Sent: Tuesday, March 29, 2005 12:41 PM
To: rpatronsky@catsmpo.com
Cc: pberry@catsmpo.com
Subject: FWD: MPA Boundary

----- Original Message -----
From: "Fisher, Jim E. (contractor)" <Jim.Fisher@KRAFT.COM>
Date: Tue, 29 Mar 2005 09:02:37 -0600

Hi CATS,

I suggest you keep it simple. Adding all of Kendall county should be a no brainer. Please do so.

I suggest separation of the issue on how much of Grundy county to add. Either add it all or do not add any of it. It is my strong opinion now that Grundy County should NOT be added to the MPA. This keeps the politics out of the boundary effort and out of the day to day operations for the MPA. It seems to me that we should try to minimize the politics as much as possible. We have a chance here to correct a past wrong (adding only part of Kendall county in the past) and not letting it happen again.

I suggest the addition of Grundy (all or part) be tabled (or denied) until the year 2010 where it can be reconsidered as part of the confirmation review of the decision to add Kendall.

Jim Fisher
Bolingbrook, Illinois
(312) 933-5105

_____ Sent via the WebMail
system at mail.catsmpo.com

[E-mail scanned for viruses]

Fisher 050330.txt

From: Tom Murtha [publiccomments@mail.catsmpo.com]
Sent: Wednesday, March 30, 2005 11:51 AM
To: rpatronsky@catsmpo.com
Subject: FWD: MPA Boundary

----- Original Message -----
From: "Fisher, Jim E. (contractor)" <Jim.Fisher@KRAFT.COM>
Date: Wed, 30 Mar 2005 07:35:41 -0600

Hi CATS,

Wanted to add to my comments from yesterday.

I was a resident of Brookfield, Illinois. I moved to Bolingbrook for many reasons. One reason is that Brookfield residents nor the government did not embrace proper planning. An example of this was that there is a very large development going on just south of Brookfield in McCook. The problem is McCook did not seek out Brookfield nor did Brookfield seek out McCook in the planning of this development. The result is that the two exits coming out of McCook north toward Brookfield forming a "T" on 47th street instead of connecting with feeder roads going into/out of Brookfield (e.g. Prairie).

Honestly, I think this was an opportunity lost for CATS to get involved in allowing [forcing?] the planning of both these villages to be aligned. I guess this is just another example case study of a missed opportunity in planning.

In this same context, the MPA boundary should extend beyond the Illinois border to include Lake County Illinois. I understand that the funding may not align with this addition and it is part of a different state; but I think it is appropriate to include Lake county, Indiana. I suggest they be given a "NON VOTING" position on the CATS board if they do not have the same funding opportunities as do counties within Indiana. It just makes sense geographically to include this county in some fashion.

I welcome your pros/cons as well around including Lake County, Indiana.

I already know one: "We already have one Lake County... What would we do with another?"

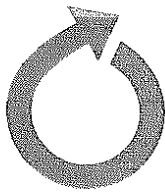
Remember, Include Kendall, do not include Grundy.

Thanks for letting me provide my input.

Jim Fisher
Bolingbrook, IL
(312) 933-5105

_____ Sent via the WebMail
system at mail.catsmpo.com

[E-mail scanned for viruses]



northeastern illinois planning commission

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Via Messenger

April 20, 2005

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Wallace D. Van Buren

Mr. Don Kopec, Acting Executive Director
Chicago Area Transportation Study
300 W. Adams
Chicago, Illinois

Dear Mr. Kopec:

We appreciate the opportunity to submit these comments to the Policy Committee regarding the expansion of the Chicago Area Transportation Study's Metropolitan Planning Boundary. Our Commission has not formally discussed the impact of expanding the Metropolitan Planning Boundary on our activities but plans to do so in the coming weeks. As you know, under current legislation, the Commission is not responsible for comprehensive planning in Kendall and Grundy counties. The following comments reflect some issues the NIPC staff has identified.

We view the new six-county 2040 Regional Framework Plan as the "core" of a larger, multi-state region. We have and will continue to work with neighboring counties, planning agencies and states on issues of growth, development and conservation. The current development and travel patterns suggest that it would be beneficial to include Kendall County in our Metropolitan Planning Area. The continuity and expansion of our infrastructure systems support this as well. Also, we see some of our municipal boundaries being extended into both Kendall and Grundy counties. Currently we do conduct facilities planning area (FPA) reviews when the proposed planning areas boundaries extend into these counties. The Commission conducts these FPA reviews as a service to the Illinois Environmental Protection Agency (IEPA). The inclusion of a new county to the planning area would require discussion with all parties including the IEPA regarding their intentions for the future review process in this new planning area. It is our understanding that IEPA does not currently have a position on this issue. Given the direct impact on growth, we presume the IEPA would consider extending the review process for this expanded portion of the metropolitan planning area boundary regardless of Kendall County's relationship with the Commission.

While the growth patterns suggest the expansion of the planning boundaries is a reasonable action to take, we believe several planning issues should also be considered.

First, the 2040 Regional Framework Plan is the result of several years of meetings, discussions and technical assessments. In order to integrate Kendall County into the Framework Plan, a similar process, outreach initiative and products should be completed. Kendall County should have the opportunity to produce a 2040 vision for its future that complements and is compatible with the 2040 Regional Framework Plan.

Mr. Don Kopec
April 20, 2005
Page 2

Second, the Commission has extensive data files for the six-county region. Little legacy data exists for Kendall and Grundy counties. Employment, housing and land-use data (inventories, major roads, base geographies, etc) may be especially weak. No legacy data exists for the NIPC Development Database. All of the available data would have to be incorporated into our geographic information system.

Third, the Commission has historically produced population, employment and household forecasts for Kendall and Grundy counties by external transportation zones for the long range transportation plan. However, these numbers have not been produced through the same rigorous process as the forecasts for the six-county region. The Commission does not have a monitoring program for the external counties and relies on information from each county planning department. A monitoring program would need to be established for Kendall County and any other new areas. If the region decides to improve and expand the data collection activities and the municipal forecast process to include Kendall County or any other new areas, the expansions could come online during the 2009 planning cycle.

Finally, while the staff believes the expansion of the metropolitan planning boundary makes good planning sense, the current budget does not allow for new staff work in Kendall and County to accomplish the above mentioned tasks. Before a budget requirement can be identified however, we believe discussions should take place with both Kendall County and CATS staff to determine what is desired and needed for the 2040 Framework Plan, land use, employment, population and households estimates, and forecasts. We would be happy to schedule a discussion of this issue with the Commission if you believe it will assist you and the Policy Committee in your deliberations.

If you would like to discuss our comments, please let me know.

Sincerely,

Northeastern Illinois Planning Commission



Ronald Thomas, AICP
Executive Director

RT:LB/stk

Cc: Linda Bolte
Central Files

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April 20, 2005

Mr. Don Kopec
Acting Executive Director
Chicago Area Transportation Study
300 W. Adams, 2nd Floor
Chicago, IL 60606

RE: 2005-09 TIP and Expansion of the MPO

Dear Don:

Thank you for the opportunity to comment on these two important matters. Our overall comment is that the information provided is an inadequate foundation for public response.

In the case of the TIP, some of the information we identify as "missing" is buried within charts, tables, abbreviations and technical terms. We are of the opinion that the Overview and Summary should not be a description of CATS' internal processes and the authority of various implementers but a substantive description of funding strategies, opportunities and constraints. Obtuse treatment of the TIP deprives CATS of the public's knowledgeable support (and potential acquiescence to a funding, i.e., tax, increase).

For instance:

1. What is the total investment projected and the year-by-year investment?
2. What proportion is devoted to maintenance and what proportion to new projects?
3. Is the TIP responsive to broad-based support for more travel choice and safer pedestrian options?
4. What proportion of funding is for transit; what proportion for highways?
5. Which projects are in the earliest planning stages and suitable for public involvement in a Context Sensitive Solutions process?
6. How does the TIP respond to federal Planning Emphasis Areas and to CATS recently adopted emphasis areas for the Unified Work Program?

In providing a list that is not aggregated into these kinds of policy categories, CATS a) seems to assume the public's only approach to transportation decision-making is a parochial desire to look up individual project(s) of interest and b) makes it very difficult for the public to even find their favored projects.

In the case of MPO expansion the web explanation is similarly obtuse and misleading.



STRATEGIES FOR LIVABLE COMMUNITIES

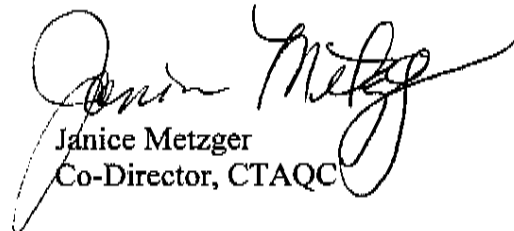
1. The statement that "It would be appropriate for both agencies (NIPC and the RTA) to review their boundaries" is disingenuous. NIPC and the RTA are statutorily defined by the Illinois General Assembly and can't amend their boundaries. CATS does not have statutory authority or the state-defined public accountability that goes with it.
2. CATS does not address the current imbalance in the CATS Policy Committee (Chicago and Cook County, with two-thirds of the region's population have less than 20% of the votes on the MPO), nor does it indicate that bringing in a county smaller than many Cook County municipalities (and smaller than all Chicago wards) would tip that balance further from the areas that contribute the bulk of the region's tax receipts.
3. The minimal cost-benefit explanation applies only to Kendall County. It does not address the costs to populated areas within the existing MPO region, which will see their discretionary dollars (CMAQ and UWP, for instance) further diluted to accommodate a county with several expensive project proposals but only 54,000 people.
4. According to the 2005-09 TIP, the two and a half Kendall County townships that are within the current MPO area are scheduled to receive \$42 million discretionary dollars (including multi-year (MYB) projects, but excluding county and local STP funds). This appears to be a higher per capita investment than in the rest of the region. To what extent will Kendall County's share of regional discretionary funds increase when all the townships are part of the MPO?

To return to the critical policy implications alluded to in point #1 of this section, we are not suggesting that the MPO boundaries be forever static. We are suggesting there should be an integrated approach to defining regional boundaries, responsibilities and benefits. Expansion of the MPO should not allow a county to draw on the benefits but avoid the responsibilities and costs. Kendall County should become a full partner, including acceptance of the Facilities Planning Area process administered by NIPC, application of the RTA sale tax and contribution to the costs of data acquisition and management. We submit with our comment one of several documents outlining actual costs for Kendall County to participate in the NIPC planning process, which we were able to receive by FOIA. The costs are formidable, exceeding a quarter of a million dollars just to collect necessary data. CATS does the region a disservice by blithely proclaiming that NIPC and the RTA should consider boundary adjustments, while ignoring the costs that some part of the region will bear in order to accommodate Kendall County.

Sincerely,



Jacky Grimshaw
Vice President for Policy



Janice Metzger
Co-Director, CTAQC

Encl: Memo May 20, 1997, Projected Revenues and Expenditures for Kendall County

- DRAFT -

May 20, 1997

To: Phillip D. Peters, Executive Director
 From: John A. Swanson, Associate Director
 Subject: Projected Revenues and Expenditures for Kendall County

The following is an initial projection of revenues and expenditures associated with adding Kendall County to NIPC:

Revenues

Using the existing local government contribution formulae, we would request the following amounts from Kendall County local governments based on the 1995 revenues listed in the Illinois Comptroller's Office Local Government Financial Database:

Kendall County	\$4,545
Kendall County Forest Preserve District	201
Village of Lisbon	125
Village of Millington	125
Village of Newark	125
Village of Oswego	607
City of Plano	533
Village of Yorkville	749
Oswegoland Park District	125
Yorkville - Bristol Sanitary District	<u>303</u>
Total Revenues	\$7,438

Other possible revenues, which cannot be estimated at this time, might include fees for facility planning area reviews; Unified Work Program funds for forecasting, GIS, or planning purposes (note: IDOT previously financed the forecasts for one Kendall County township for air quality purposes); IDNR for greenways and trail planning; IEPA water quality management planning funds; or possible grant monies from a community-based foundation.

Expenditures

There is an extensive range of products and services which could be provided to the county. The following is a listing of a "core" package of products and services and their costs:

Local service officer (senior planner @ 180 hrs./yr with mileage)	\$12,500/yr.
Project notifications and reviews	350/yr.
NIPC bulletins and reports	<u>500/yr.</u>
Total expenditures	\$13,350/yr.

There are a number of other products and services for which it has not been possible to develop initial costs estimates on short notice. Indeed, to do so would require spending some time with the Kendall County staff to determine what already exists and what their needs would be. Products and services in this regard might include, but not be limited to:

1. Aerial photography
2. Census data/data base expansion
3. Development monitoring
4. Geographic Information System (GIS) development
5. Plan revisions/updates (e., Strategic Plan for Land Resource Management, Transportation, Greenways, etc.)
6. Population and employment forecasting
7. Special use mapping (e.g., flood, wetland, landfill and wastewater facilities)
8. Stormwater management planning
9. Technical assistance

Some of these products could be extremely expensive and take years to complete (e.g., GIS development and plan revisions/updates). Indeed, M. Dieber has indicated that the costs of expanding our data base and geographic information system could readily exceed \$250,000. Sources of funding for these products and services have not been identified, but some IDOT/Unified Work support might be possible because of the transportation/air quality relationships.