

Chicago Transit Authority

Circle Line Alternatives Analysis Study

Screen Three Public Involvement

Public Comments and Questions (Appendix)

Comment No: 23

Topic Area: 4, 7, 12, 13, 18, 20

Received via: UIC

Without the North Connector between Lake St. and North/Clybourn, I question the benefits of the project against the \$1.1 billion cost, which will eat up a lot of our allotment of new starts money (should we receive any). Much of the service area in this study already has decent bus service, making many of the connections planned in this LPA. If money is available to build the entire long term goal, linking the north main line to the orange and creating an outer loop, then the benefits will be realized; otherwise the Clinton St/Larabee subway, red-orange-yellow extensions and the brown-mid city transit way should be the main focus of future rail extensions, competing for very limited transit capitol funds. The Clinton/Larabee subway would also work to reduce loop congestion. Of course, Oct 2 could bring us good news for a potential windfall of new money to move forward on multiple projects, including the long term plan for the circle line. Should the current LPA move forward, a Madison St. station is critical. The United Center is the largest activity generator on the near west side outside of the medical district. Proximity is key to attract new users, especially as basketball season is in winter months. A station at Madison would also encourage new infill TOD Development on existing surface parking lots, which are both owned and not owned by the United Center.

Comment No: 97

Topic Area: 4, 12, 15

Received via: Email

I was disappointed to read that the Recommended Locally Preferred Alternative for the planned Circle Line does not include an alignment component between the Green/Pink Lines and Blue/Red/Brown/Purple Lines. By neglecting this alignment, residents of the densest neighborhoods in the city with some of the highest rates of public transportation usage will not have ready access to this important new public transport option. I am a resident in the Bucktown/Wicker Park neighborhood and frequent user of the Blue Line. I was looking forward to connecting to the Circle Line via the Blue Line. Since the Recommended Locally Preferred Alternative does not include an alignment component to the Blue Line, I will not be served by the Circle Line. I understand the plan proposes that alignment be added to the Blue Line and other additional lines in the future on an incremental basis. However, I think it is a mistake to not include these important connections as part of the main project. There is no guarantee that funding will be available for supplemental parts of the project later. Construction costs will almost certainly be higher in future years if the alignment is deferred. Public support for the circle line is currently high and federal funding is being secured. This has created a lot of momentum for the project. I suggest the CTA take advantage of the current project momentum and seek full project funding, including the important alignment component between the Green/Pink Lines and Blue/Red/Brown/Purple Lines.

Comment No: 103
Topic Area: 4
Received via: Email

The best BRT systems to serve the Cicero Ave and Western Ave corridors would primarily be located on the excess railroad systems to serve the Cicero Ave and Western Ave corridors would primarily be located on the excess railroad embankment rights-of-way just east of Cicero and just west of Western. BRT on these rights-of-way could be built to have the following characteristics from the list above¹: 1, 2, 3, 4, 6, 8, 9, 10, 11, 12, 13. These services would be true “rapid transit” and should be a goal of the CTA.

Comment No: 107
Topic Area: 2, 4, 5, 6, 11, 15, 22, 23
Received via: Email

SUMMARY: The Screen 3 analysis of the Circle Line concept and alternatives is insufficient for approval of a Locally Preferred Alternative (LPA) at this time. The analysis does not justify the selection of a reduced capability initial configuration as the LPA, as it fails to meet substantially all of the purposes for the line. Even in its full circle implementation, the proposal does not adequately address one of its major purposes, improved connection with Metra. Moreover, the analysis has not taken into account the effect of major additional transit proposals of the Chicago Central Area Action Plan within the Study Area. The alternatives considered for Screen 3 are suboptimal. A major concern is raised on the proposed alignment of the Pink to Orange Line connection, and its potential adverse impact to the community; an alternate alignment is suggested. The BRT alternative is also deficient in that it is not a true Circle Line; a complete circle BRT is suggested for evaluation. Most important, the deficiencies in analysis are compounded by deficiencies in the public participation process. The information presented to the public about the Circle Line analysis was insufficient to allow meaningful public comment on critical aspects of the analysis. I strongly recommend that the CTA Board not approve the staff-proposed Locally Preferred Alternative, but rather return it for further analysis and improved public engagement. DETAILED COMMENTS: 1. Insufficient public information A significant amount of engineering effort has gone into the development and evaluation of 27 alternatives in the Screen 3 process. However, the totality of the presentation to the public of that evaluation consists of about 12 substantive slides (in a 28 slide presentation), and a set of presentation boards that basically replicate that material. The resolution of the pictures in those documents is insufficient to obtain more than a vague concept of the proposed alternatives. There is no published supporting information from all of the engineering work. The basic content, not to mention the implications, of those proposals cannot be meaningfully evaluated by the public based on the information provided. For example, there is no complete segment by segment description of the recommended LPA. It is not clear what assumptions were made about the connection between the Pink and Orange Lines, such as the route of the elevated structure south from the Pink Line, or the type of bridge projected for the Chicago River crossing. There are some alternatives that are screened out without any supporting information as to why – and only a nearly illegible indication of the existence of those alternatives (slide 19). The Summary Evaluation Matrix has a fine set of numbers – but no indication how they were derived, or the assumptions made in their calculation. There is no justification for selection of these particular metrics as the basis for evaluation, nor any validation of the inputs that were used for the modeling. As a citizen and an engineer, I am suspicious of such numbers without substantiation. Further, the decision to propose a downscoped initial capability was presumably based on a number of considerations. However, those considerations are nowhere described. The downscoping significantly affects the ability to meet the stated needs and purposes of the project. The public can not comment on the reasonableness of the proposal without seeing the factors that went into the downscoping. The Public Participation Plan adopted by CMAP and applying to the MPO, and by extension to all projects that will be approved by the

¹ This portion of Comment 103 refers to Comment 97.

MPO, states the principle “The public participation process provides participants with the information they need to participate in a meaningful way.” The information provided to the public for the Circle Line Screen 3 Analysis does not meet this principle. A complete, substantive supporting report must be available to the public for comment before acceptance of an LPA.

2. Reduced capability initial configuration The value of the Circle Line comes from having an integrated, whole circle; it can be evaluated appropriately only as a whole. The breaking of the Circle Line concept into an interim capability and a “long term vision” for the northern connecting segment poses significant challenges for selecting a Locally Preferred Alternative. Without evaluation of specific approaches for the northern segment, and how they would participate in a complete Circle Line, it is not clear that a decision on an LPA for the interim capability is valid. The interim capability therefore needs to be evaluated on its own merits with respect to the needs and purposes of the project. It is appropriate to evaluate the interim capability only by NOT presuming the implementation of the northern connection long term vision. And in that regard, the interim capability apparently falls far short of achieving the stated purposes of the Circle Line project. For example, it is not clear how the recommended LPA will “improve access to major regional activity centers”, “improve CTA and Metra transfer connections”, or “increase regional transit system efficiency.” The analysis as presented to the public does not provide explicit justification for recommendation of the LPA against these criteria; there is in fact no way to tell how the proposal was rated. It is not at all clear that the interim capability is a useful addition to the CTA system that warrants a designation of Locally Preferred Alternative. A recommendation for an LPA must be based on objective criteria derived from the stated purpose of the project.

3. Connection with Metra One of the major stated purposes for the Circle Line is to “improve CTA and Metra transfer connections”. The approach used seems to simply assert that Metra should add stations at North or Ogden (UP-N and UP-NW), at N Ashland (UP-W, MD-W, MD-N, and NCS), and at S Ashland (BNSF) to connect with the Circle Line. There is no supporting information that establishing such interchange stations is feasible, or that Metra would even consider the necessary changes to its operations to support those interchanges. In fact, there is good evidence that locating Metra stations at the first two of those locations is impractical in terms of both physical and operational constraints. In particular, the N Ashland location needs to be evaluated in light of the planned relocation of the UP-MD interlocking approximately 700 feet east of Ashland Av. Without asserting changes to Metra operations, it may still be possible to improve connections by having the Circle Line continue north on the Ashland corridor to provide an interchange at the existing Metra Clybourn station with the UP-N and UP-NW. However, this alignment does not seem to have been considered, and is not among the “long term vision” alternatives for the northern segment. Connection to the BNSF at the existing Metra Halstead station can also be provided with an alternate alignment (see below). It is not clear how the current proposals were assessed against the criterion for Metra connection, and whether such assessment is valid.

4. Effect of proposed Clinton Subway Since the Circle Line Screen 2 analysis in 2006, the City of Chicago has prepared and published its Central Area Action Plan. A key transit proposal in that Plan is the Clinton Subway, with a proposed alignment from the North/Clybourn Station through the West Loop to the Cermak/Chinatown Station. The Clinton Subway thus parallels the western segment of the Circle Line approximately 1.3 miles to the east, with similar end points. It is situated within the Circle Line Study Area, and it may meet some of the same needs as the Circle Line. Even if not considered as an alternative to the Circle Line, implementation of the Clinton Subway would certainly impact the ridership projections for the Circle Line. It is imperative that the Circle Line analysis take into account the possible implementation of the Clinton Subway, and reevaluate the Screen 3 alternatives considering the presence of that line. While there is not necessarily an explicit or implicit trade-off of the Circle Line against the Clinton Subway, the analyses and selection of LPAs for each of those projects need to be done with a broad view of the evolving total environment of the Study Area.

5. Alternative southern connection route A major problem of the proposed LPA is the southern connection from the Paulina corridor (Pink Line) to the Orange

Line. The proposed alignment (continuing the Paulina corridor more or less directly south) will apparently require taking a substantial number of properties in the vicinity of Cullerton (20th) and Paulina. Taking residential and retail commercial properties in this neighborhood raises issues of social and economic justice, imposing a significant burden of the project on a low-income neighborhood will get relatively minor benefit from it. Unfortunately, the level of detail presented to the public for the recommended LPA obscures rather than elucidates the community impact of this proposed alignment – it is shown simply as a convenient direct continuation line on a high level schematic map. Presumably, the engineers made an estimate of the number of properties that would be affected by this planned segment; that number should be part of the public discussion. Without further clarification of the assumptions and impact estimates made by the planners for this segment, it is impossible for the public, and the affected community in particular, to meaningfully assess it and provide public comment. However, the neighborhood impact can be minimized, or even eliminated, by a different alignment of the southern connector. I would suggest that a better route would take the Circle Line east from the Pink Line at 16th Street along the BNSF right of way, crossing the Chicago River at or near the St. Charles Air Line bridge, then turn south to meet with the Red Line (Dan Ryan Branch) near its subway portal. The Circle Line would then turn east along 18th St to connect with the Orange Line at a new 18th/Clark station, as proposed in the CTA recommended LPA, and continue on the Orange Line tracks to the 14th St incline into the State St subway. This alternate route would allow sharing of the Chicago River crossing with the proposed CTA Clinton Subway Line, thus substantially reducing the total cost should both lines be constructed. It would also allow a connection with the Metra BNSF at the Halstead St station, rather than requiring a new Metra station at Ashland. Construction costs and construction impact for a surface routing along the BNSF ROW would also be substantially less than an elevated segment along the dense Paulina corridor. It would also not require taking of any residential or retail commercial property, and substantially less industrial property than the CTA recommended LPA. This routing along the BNSF ROW would reduce the Circle Line length by over two miles, and three station stops, thus shortening total running time by somewhere in the vicinity of 10 minutes, and improving the Travel Time Savings metric. The trade-offs of routing against community impact must be made in a transparent open process. One of the fundamental purposes of public participation is to elicit local concerns for proposed plans. The idea is to have early feedback, so that simply convenient lines will not be drawn on maps without adequate consideration of the reality under those lines, and before planning goes down an ultimately unacceptable path. This has not been done for the Circle Line analysis.

5. BRT Circle Line route

The BRT alternative considered in Screen 3 suffers from not being a full circle route. It thus does not have the same single-seat ride characteristics as the heavy rail alternatives, and does not provide a true comparison to a heavy rail Circle Line. A comprehensive circle route BRT alternative was apparently considered, as there seems to be an item on presentation slide 19 for “BRT – Ashland Full Circle” (although as posted on the Internet it is unreadable). But it is not clear what the alignment was of this full circle BRT route, and why it was screened out. I would suggest evaluating a full circle BRT route from Archer Av, along Cermak to McCormick Place, then north along the Lakefront Transitway (as proposed in the Chicago Central Area Action Plan) into Streeterville, and then along the Chicago Av BRT route to Ogden. In addition to providing a complete BRT circle, this route would provide access to lakefront locations –the Streeterville medical campus, Illinois Center, Grant Park, Museum Campus, Soldier Field, and McCormick Place – making it a much more destination-rich route. It would provide connections to the Metra Electric Line and the proposed Carroll St Transitway, which are not available with the heavy rail alternatives. Further, this complete BRT Circle Line would leverage and complement the Chicago Central Area Action Plan BRT proposals for the Lakefront Transitway and Chicago Av, as well as the proposed Ogden Av Transitway. Its construction would create a more integrated total BRT system, potentially raising the value of all the BRT segments, and providing additional incentive for the Central Area Action Plan BRT proposals. Although I am not advocating this BRT alternative at this time, an honest alternatives analysis should include a BRT Circle Line comparable to the heavy rail alternatives, so that the public can comment on this significantly less expensive alternative to HRT.

CONCLUSION The Screen 3 analysis was deficient in the refined alternatives considered. For heavy rail, the inability to select a northern connection casts doubt into the validity of the whole analysis for selecting a Locally Preferred Alternative, and the

southern connection raises considerable questions of social and economic justice that could be alleviated by an alternate alignment. The practical and operational issues with connection to Metra seem to be discounted. For BRT, the absence of a true Circle Line as an alternative depreciates the value of the line, and sets it up for failure against the heavy rail alternatives. Further, the Screen 3 alternatives analysis did not take into account the Chicago Central Area Action Plan proposals. For heavy rail, this includes the Clinton Subway; for BRT, it includes the Lakefront Transitway. These proposals could have significant impact on the Circle Line economics, both positive and negative, and must be considered. Most important, the amount of information provided to the public is woefully insufficient for meaningful public comment. Illegible presentations are just the start; the total absence of supporting documentation is absolutely unacceptable. Public participation is essential to effective planning, and the CTA has not met its responsibilities in this area for this proposal. I strongly recommend that the CTA Board request further analysis with respect to these deficiencies, and further direct the staff to provide additional supporting information for the analyses to the public.

Comment No: 125

Topic Area: 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 16, 17, 18, 19, 21, 22, 23

Received via: Email

This letter is regarding CTA's New Starts Alternatives Analysis of the Circle Line.

1. To the maximum extent possible, CTA should direct capital dollars to maintaining and enhancing service on the existing rail and bus system prior to any capital expansion. Once the CTA demonstrates sufficient progress toward bringing the existing rail and bus system into a State of Good Repair (SGR) and sufficient progress on maintaining, enhancing, and expanding the bus system, then Chicago should consider a capital expansion.
2. Red Line Extension The Little Village Environmental Justice Organization (LVEJO) believes that the Red Line Extension to 130th Street along the UPRR route should be CTA's first capital expansion priority for the EI. It must take priority over the CTA Circle Line and the Metra Star Line in order to remedy the systemic and institutional racial discrimination created by unequal access to rapid transit on Chicago's South Side and South Suburbs. This project would greatly reduce the travel times of transit riders traveling between Chicago's far South Side and Downtown Chicago, providing significant economic benefits to riders and the regional economy.
3. LVEJO opposes the CTA's Recommended "Phased" LPA for the Circle Line. We recommend that further study be made of the Cicero Beltway Mid-City Transitway (MCT). The MCT would extend rapid transit to a greater number transit riders in underserved, low-income neighborhoods and communities of color than the Circle Line. Studies of the MCT commissioned by the Chicago Department of Transportation (CDOT) showed a projected MCT ridership of 100,000 passengers daily, or (37 million riders annually, as compared to CTA's LPA Ashland Circle Line's 25.5 million). The MCT would connect to more Metra and CTA transit lines. It would also provide greater connections to the Cook-Dupage Corridor. According to an RTA study, the Cook-Dupage Corridor is forecasted to have 4% population growth and 20% job growth. MCT expansion would better improve connections between the City of Chicago and this corridor.
4. The existence of an Ashland Circle Line plan as early as 2002, before the New Starts Alternatives Analysis was began shows a bias for a particular route in spite of planning limitations of this route, and the existence of other more promising options.
5. Phase I of the Circle Line (the Paulina Connector) happened with no public participation. Additionally, the public was not informed that this phase was part of a larger New Starts project. Therefore, we believe there was a violation of federal public participation requirements for this project.
6. The Phased LPA connecting the Cermak Pink Line to the Midway Orange Line will not provide significant operating efficiencies. This connection can better made at a lower cost by improving the bus connections along Ashland Avenue.
7. Connecting the Circle Line LPA between the Pink/Green Line and the Red/Purple/Brown Line will involve significant environmental risk - tunneling under Chicago River to build subway.
8. Circle Line LPA construction would create significant disturbance to commercial and residential area in the Ashland/North avenue corridor for 3-5 years. Any subway construction would require cut and cover of Ashland and North Avenues.
9. The Circle Line LPA will involve displacement of low-income Latino families in Community Area 31 Lower West Side.
10. CTA's LPA would create a

disparate impact by expanding rapid transit near the affluent downtown Chicago area and making no plans for capital expansion in outlying low income areas and communities of color. CTA should consider these factors prior to the Environmental Impact Statement (EIS) because the project becomes too limited in scope (route) by the Alternatives Analysis phase. 11. CTA has not provided equal weight to the Cicero and Ashland corridor. They recommend a phased LPA for Ashland but have not evaluated a phased LPA for Cicero. LVEJO recommends study of a phased Cicero LPA. 12. Previous studies of the MCT commissioned by the CDOT showed a capital cost 1/4 to 1/8 that of CTA's estimates. CTA's addition of a Brown Line Extension into the MCT does not meet the stated purpose of creating a North-South connector route. Furthermore, the property acquisition would displace households and businesses and would distort the cost of the MCT option. 13. Yellow Line The MCT has the possibility to be extended to connect with any extension of the Yellow Line to Old Orchard Mall. Given the large number of complaints about the proposed Yellow Line Extension, CTA needs to modify the Locally Preferred Alternative (LPA) on that project to accommodate the needs of those raising objections to the project. If a Yellow Line project is built, CTA needs to show how it could be integrated into an MCT. 14. Even without a Yellow Line Extension, the MCT would provide connection to CTA's O'Hare branch Blue Line. CTA's recommendation for a Brown Line Extension unnecessarily distorts the cost of the MCT and creates an inaccurate comparison to the Ashland Circle Line. 15. Orange Line Extension LVEJO supports the CTA's Orange Line Extension Project. CTA should evaluate building this extension in conjunction with the Mid-City Transitway (MCT). 16. Railroad Safety CTA has not sufficiently evaluated the Cicero Corridor if built on an elevated structure or as a Class I Railroad instead of as EI-style heavy rail. CTA's study shows an exaggerated cost of the MCT due to property acquisition to meet FTA/FRA ROW clearance between CTA EI type trains and Class I Railroad currently in place there. Grade separation or the use of Class I railroad rolling stock would reduce the need for excessive property acquisition adjacent the Cicero Beltway Railroad. LVEJO recommends that CTA identify how this Alternative would compare to the LPA. 17. Bus Rapid Transit – Bus-Only Lanes If CTA rejects a grade-separated heavy rail or Class I rail option for the MCT on the basis of operating efficiencies, then another good option on the basis of cost per passenger mile would be to propose a network of multiple north-south Bus Rapid Transit (BRT) lines on multiple corridors, using existing lane with for bus-only lanes where possible. Without bus-only lanes, a Cicero BRT would carry 20-22% the projected ridership of an Ashland heavy rail option. However, the capital cost would be only 1/10 to 1/20 the cost of the Ashland heavy rail option. It is also 1/2 the annual operating cost of the Ashland heavy rail option. This means that it would realize vastly superior operating efficiencies. An entire network of North-South, as well as East-West BRT lines, could be built and operated with the option of incorporating overhead electric power. This network would have a combined ridership competitive with that of the Ashland Circle LPA for a comparable or much lower cost. This network would also provide greater coverage of low-income neighborhoods and communities of color outside living and working outside the Central Area. Furthermore, it would have the flexibility to be rerouted to adapt to changes in demographics. We encourage you to seriously consider these recommendations. We request a reply addressing these concerns within 30 days.