

DATA-DRIVEN DECISIONS COMMENTS AND RESOLUTIONS

Comment	Resolution
1. First, applaud the efforts to develop a public facing data driven process and believe, over time, IDOT will see significant benefits.	Thank you for your kind words, IDOT is committed to improve the process in which we select capacity projects.
2. Most of the measures proposed are lagging indicators (existing AADT, existing Travel Time Index, existing crash frequency, is it on the National Freight Network, etc.). These lagging indicators are helpful for identifying where there are existing needs or gaps, but not useful in determining the actual impact of the proposed project (i.e. how is travel time index improved, how much reduction in crash frequency, how is travel delays on the freight network improved, etc.) Most of your proposed measures are excellent at showing where there are high value needs, but will have significant shortcomings in showing the benefits nor show the costs of the proposed improvements. Without monetizing the benefits and costs of projects it is difficult to do any tradeoff analysis or financial optimization.	Thank you for the comment. AADT, TTI, crash frequency and the NFN are only a couple measures used in project selection. IDOT hopes to develop more predictive measures in the future. At this time, we're measuring existing conditions and relying on the planning process to address specifics like safety improvement measures.
3. A good tool for measuring economic impact is TREDIS software out of Cambridge Mass. REMI can also be used especially if it is already used by the Illinois Department of Commerce. Support to proposed major developments is beneficial, but those benefits and costs need to be quantifiable.	Thank you for the comment. Economic development is an important factor in IDOT's mission. We are committed to examine all available software to assist in developing a better ranking, we will take these recommendations into consideration.

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4. Proposed measures for Environmental Impacts: i.e. Environmental Justice – is project located in a minority population and/or low income area needs to be measured in benefits vs costs, just the presence of the project does not describe its impact. Similar analysis can be made for Equity – access to transit by itself does not measure equity.

Thank you for your comment. Environmental Justice is just one method we use to identify benefits for the Environmental Impacts/Livability Goal. We are still in the process of developing the Equity criteria and will take this comment into consideration.

IDOT and the State of Illinois should ensure they have achieved and can maintain a state of good repair of the state highway system prior to expansion, capacity or other enhancement types of projects. As far as the tool itself, I would suggest a requirement that all IDOT districts throughout the State of Illinois receive an equitable share of expansion and enhancement project funding.

Thank you for your comment. IDOT is committed to improving the state-of-good repair of the state’s roadways. A majority of transportation dollars are spent on state-of-good repair. A Transportation Asset Management Plan (TAMP) has been developed to address state-of-good repair needs. IDOT did consider geographic equity as a subjective measure when reviewing the new capacity projects for funding.

1. Please realize that IDOT roads and corridors are used by more than motor vehicles. The goals and metrics must include other users.

As noted, this tool is limited to highway capacity improvement projects and does not evaluate other modes of transportation. IDOT continues to evaluate the tool and the best way to measure a project’s impacts to the community and to the roadway system. As criteria continue to evolve IDOT will continue to look at other agency measures to see if they are relevant to the IDOT tool.

2. Please use realistic projection, including induced demand. Widening a road will lead to more cars using the road. Furthermore, if widening a road reduces other cross access, traffic may go up on other roads.

Thank you for your comment. As criteria continue to evolve IDOT will continue to examine how the criteria perform and evaluate if they are meeting the criteria goal. Induced Demand is something the department has added to it's lessons learned moving forward and will continue to evaluate how that can be measured.

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3. The goals need a much broader definition of economic development. Major freight terminals are a very narrow definition. Will widening a road negatively affect businesses along a corridor? Will sound barriers and aesthetic improvements improve property values? How important is a corridor to the economic vitality of a community? Is traffic preventing economic activity? All of these issues need to be considered.

Thank you for the comment. As IDOT utilizes the tool the department will examine if the criteria are meeting the objective of the goal. Adjustments will be made as needed.

4. Take a look at Virginia's Smart Scale program. It is a good model to use.

Thank you for the comment. The department did review Virginia's Smart Scale as the criteria and process was developed.

The Tool goal of "Traffic Operations / Congestion" could just be titled Mobility. The criteria shouldn't be so biased toward auto capacity expansion as they are. AADT and AVMT are essentially double counting and steering toward already built up infrastructure. This mobility item needs to be broadened to non-auto modes. Consider measures of person-travel and access (not accessibility) as essential components of mobility.

Thank you for the comment. The Tool was designed specifically for roadway capacity projects. In the future IDOT will explore ways that access to other modes of transportation can be considered when evaluating projects.

"Safety" would be part of Mobility per the LRTP, but given the context of the Tool I'm with you on keeping it separate. Frequency-only further biases toward high volume facilities. At a minimum include criteria for rates and severity. Another is to include an allowance for crash type and potential for improvement (i.e. to not miss out on the low hanging fruit like a guardrail, better lighting or marking, etc.)

Thank you for the comment. The methodology for safety examines IDOT's crash data points. It does take into consideration crash severity. Specifically, the criteria examines "Only crashes that resulted in death, incapacitating injury, or non-incapacitating injury are considered major crashes and are used for the purposes of the Major Crash Frequency measure". The

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department is releasing an in-depth look of how the tool works with detailed definitions posted on IDOT's website.

"Economic Development" aligns well with
Unless you consider sprawl a goal, pull the criteria for access to a major development. This sort of project happens on its own well enough without including it in a Decision Tool.
Add criteria for freight (not only trucks) delay and reliability

Thank you for the comment. The Tool was developed for roadway capacity projects, due to that, the Tool does not look at other modes. Major development considers new development and development that is underway. It is intended to capture recent changes in traffic that Traffic/Congestion measures may miss. It is not intended to enable new development, but rather consider development that is happening or has happened.

"Environmental Impacts / Livability" could just be called Livability

Thank you for the comment.

"Regional Rating" isn't a goal but a political override, we understand

Thank you for the comment. The Regional Rating criteria was developed to allow for local input, it is important to note it is only one of eleven criteria and only accounts for 10% of a project score as compared to crash frequency which accounts for 30% of a project score. IDOT District offices are in a position to give an on-the-ground assessment of the relative need for their projects in ways that DDD Tool might miss.

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Resiliency and Stewardship are still lacking in the Tool, and they're both important IDOT strategic goals.

Thank you for the comment. Based on the feedback received, the Department added a resiliency metric regarding whether the asset has been impacted by an emergency event in the last 20 years. We are committed to continue to develop resiliency criteria. Additionally, we are committed to evaluating stewardship. Though not a formal criteria, when evaluating the projects cost is taken into consideration.

Stewardship should really, really be included here as its own goal, but almost as a counter-goal because maintaining existing facilities, including criteria for bridge / structure / pavement / infrastructure condition, and investing toward state of good repair are going to detract from new capacity expansion. No ribbon-cuttings, but still a good thing.

Thank you for the comment. The Tool was developed for roadway capacity project and not for maintenance of existing assets. The majority of available funding is for maintenance of existing assets and is out lined in the Department's Transportation Asset Management Plan (TAMP), which addresses the issues of state-of-good-repair. You can learn more about the TAMP at <https://idot.illinois.gov/transportation-system/transportation-management/planning/tamp>

Please consider truck traffic. Truck ADT can be used as a criteria under Traffic Operations/Congestion and should be specifically identified beyond ADT. For example, I-57 between Marion and Mt. Vernon, the ADT is ~40,000 vehicle day. That is nothing unusual, but when the % of traffic is 35% trucks (over 14,000 trucks per day) it can really change the comfort level, life of the pavement, traffic flow, and the dynamics & needs of a corridor. We need to capture the impacts that large truck volumes have on our roadways.

Thank you for the comment. The Tool currently examines overall AADT. However, in order to capture some of the truck consideration the economic development goal has a criteria which provides points if the project is located on the National Freight Highway Network. As the Tool is used it will continue to be reexamined to see if its meeting the desired outcome of the goals.

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Bike lanes are wonderful and they make biking much less stressful.. Protected bike lanes are the best! However, as a long time Divvy user, going from the Metra to the medical center area, I have noticed that when the going gets scary, the bike path always ends. If there is a narrow bridge where the cyclist really really does not want to deal with cars, suddenly there is no bike path. This could stand some attention to improve it.

Thank you for the comment. This Tool is for roadway capacity project, however IDOT does understand the importance of cycling as a mode of transportation. You can learn more by checking out IDOT's Illinois Bike Transportation Plan by visiting <https://idot.illinois.gov/Assets/uploads/files/Transportation-System/Reports/OP&P/Plans/BikePlanSummaryFinal.pdf>

For now and the future, public transpiration is vital, to reduce carbon emissions - electric buses, trains etc., and quality bus drivers too.

Thank you for the comment. The Tool is specific to roadway capacity projects, public transportation is important to the department. You can learn more on the steps IDOT is taking to improve the future of transit in the state by visiting the "Transit Tab" on the planning homepage <https://idot.illinois.gov/transportation-system/transportation-management/planning/index>

What year is AADT taken from, with COVID causing havoc on our traffic, it may not be wise to use the past year or two years as a measure.

Thank you for the comment. The COVID pandemic has dramatically changed AADT numbers throughout the state, IDOT understands that the years of the pandemic are a statistical anomaly and will not be using those years.

Happy to share information on mobility and economic hardship index.

Thank you for the comment, we have received a briefing on the index and will consider it as we evaluate equity measures.

Economic Development – intermodal facility, 1 or 3 miles may not be expansive enough – consider 5 miles and talk to Will County.

Thank you for the comment. The current criteria uses 3-miles as the upper limits. IDOT will examine how this criteria works in meeting the goal of economic development. Additionally, the Regional Rating criteria allows for

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IDOT district staff to rank projects in importance which can capture facilities over 5 miles.

Happy to see the tool and applaud IDOT for developing it and seeking such extensive feedback on it.

Thank you for the comment.

Willing to be part of the conversation; a clear synergy is whether a project is included in an MPOs long range plan

Thank you for the comment.

I offer a few comments regarding the Safety Goal and the crash frequency criteria. I recommend IDOT consider not including all crashes in the evaluation, but only fatalities and serious injuries. These two categories of crashes have the largest impact on society and the individuals involved. There are many advantages to also including minor injuries, but I don't see much value with including property damage only crashes. I also recommend IDOT utilize five years of safety data (if available) in evaluating crashes. Typically, a five year period is selected to provide a large enough sample of data, while minimizing the chance of an outlier in the data. For example, either a year with excessive number of fatalities or an unusually low number of fatalities. Also, when selecting the time period, it is important to use whole years to avoid cyclic or seasonal variations in the crash and traffic data.

Thank you for the comment. The methodology for safety examines IDOT's crash data points. It does take into consideration crash severity. Specifically the criteria examines "Only crashes that resulted in death, incapacitating injury, or non-incapacitating injury are considered major crashes and are used for the purposes of the Major Crash Frequency measure". The department is releasing an in-depth look of how the tool works with detailed definitions posted on IDOT's website.

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LCDOT would encourage the department to give traffic operations/congestion and safety goals higher weighting than the other categories of metrics

Thank you for the comment. Safety is important to IDOT and has the highest weight of all criteria accounting for 30% of the weight. Traffic operations/congestion has a weight of 20%. The weighting was calculated in part based off input received by the public via survey that was conducted in 2021.

Traffic Operations/Congestion - AADT TTI - LCDOT is supportive of these metrics; Change in AVMT- LCDOT is supportive of this metrics as long as the same time period is used for the change in AVMT for all projects

Thank you for the comment. All measures are examined using the same time period.

Safety - LCDOT does not feel crash frequency is the correct metric to use for safety evaluations; the metric used should be able to advance projects that meet safety targets. Safety goal should look at severity of crashes in addition to frequency.

The dept could use IDOT's safety tiers for intersections and segments to score safety or use IDOT's crash prediction tool to compare crash frequency to expected crash frequency. Ideally, potential projects would be evaluated for crash modification factors that a project is expected to have and score projects on their expected reduction in the types of crashes seen within the project limits.

Thank you for the comment. The methodology for safety examines IDOT's crash data points. It does take into consideration crash severity. Specifically the criteria examines "Only crashes that resulted in death, incapacitating injury, or non-incapacitating injury are considered major crashes and are used for the purposes of the Major Crash Frequency measure". The department is releasing an in-depth look of how the tool works with detailed definitions posted on IDOT's website.

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Economic Development - LCDOT believes that strictly using the NHFN is too limited. Suggest projects be scored on the percentage of heavy trucks using an existing facility or expand beyond the NHFN to include all roadways functionally classified as principal arterials and above.

Major development metric is of limited use in evaluating potential capacity project

Intermodal Accessibility believes the 3 mile distance should be expanded to at least 5 miles. Also should consider if a roadway intersects with a freight rail line and provide additional points for those projects that do.

Thank you for the comment. As IDOT is utilizing the tool the department will continue to examine criteria in the Tool to ensure it is meeting the desired outcome of the goal. IDOT is committed to improving it's processes and procedures.

Environmental Impacts/Livability - LCDOT believes both EJ areas and buffer areas should be used when scoring projects

Level of Environ Impact Analysis required - LCDOT believes this is a -- reasonable metric

Equity - LCDOT believes equity should be an important consideration when evaluating projects for inclusion in the MYP

Resiliency - agree it is an important consideration but encourage the dept provide more detail on how this would be utilized

Emissions - support the use of this metric in the tool

Thank you for the comment. IDOT is continuing to develop the equity and emissions criteria and will take your comment into consideration.

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Regional Rating - LCDOT believes this metric makes sense given the diversity of project and areas within the state. LCDOT has developed and keeps an up to date prioritized list of improvements on the state system known as the Lake county State Highway Consensus List, they believe projects prioritized by local partners should be prioritized for inclusion in the MYP.

Thank you for the comment.

LCDOT would ask the department to consider a category for projects that include non-motorized infrastructure as well. Projects that would extend or connect to municipal or regional trail networks should be given additional points during the evaluation stage.

Thank you for the comment. The Tool was developed specifically for roadway capacity projects, however IDOT continues to strive to improve its project selection process across all modes.

Agriculture is a leading industry in Illinois in terms of economic impact contributing \$8.85b annually to the state's economy and employing 1.5 million Il workers in the food and fiber system. IFB wants to ensure the evaluation criteria proposed doesn't put rural infrastructure issues at a disadvantage.

Thank you for the comment. As part of the development of the Tool IDOT took into consideration stakeholder feedback from across the entire state to be sure the thoughts and opinions of all residents and stakeholders are taken into consideration.

Economic Development - should consider the importance of transportation project to accessing markets and maintaining and improving the economic vitality of the region. Access to intermodal facilities is important for agriculture, but the emphasis on intermodal facilities within 3 miles may put rural projects at a disadvantage. Projects may provide value to reaching intermodal facilities from longer distances away, especially in rural areas.

Thank you for the comment. IDOT will continue to examine how the tool's criteria will impact the economic development goals as the tool is used.

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IFB asks that the efficiency of rural roads be an influential factor in the subjective portion of the regional rating to ensure farmers can continue to access local, national and international markets.

IFB has concerns that a "one size fits all" matrix may not reflect the diverse transportation needs of all regions of Illinois.

Thank you for the comment. In our lessons learned document, separate consideration of Rural vs Urban roadways is something the Department is committed to evaluating.

IDOT should reconfigure the approach to define "capacity expansion" projects as encompassing any project that increases the person-throughput of state-owned or state-managed public rights of way, rather than the current approach which more narrowly considers vehicle throughput alone. We suggest IDOT develop a multiyear plan that includes all surface transportation projects, including roadway, transit, bicycle and pedestrian. IDOT should use mode-neutral performance measures to prioritize investments.

Thank you for the comment. IDOT understands the importance of other modes of transportation. The Tool was designed specifically for roadway capacity projects. In the future IDOT will explore ways that access to other modes of transportation can be considered when evaluating projects.

Equity should be embedded through the process and not be isolated as a separate criterion. We recommend for several measures the criterion be calculated for both the general population and EJ populations, if the project has fewer benefits for EJ populations or creates harm to them, the project should receive the lowest score on that criterion.

Thank you for the comment. IDOT is still developing the criteria to evaluate equity. Your suggestions will be reviewed as IDOT continues to develop that criteria to include within the Tool.

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IDOT should clearly define which projects in the MYP are capacity projects of the type that will go through the DDD tool.

Thank you for the comment. The DDD Tool is used to determine priority for funding for capacity projects. Unless previous phases for a project have been included in the MYP, projects must use the DDD tool to be included in the MYP. The overarching document explaining how the tool works does include what triggers a capacity improvement. Additionally, in the FY23-28 MYP; capacity projects will be highlighted.

IDOT should establish a process and time line for making updates to the DDD tool. It should evaluate what is working well and what should be improved and seek to adjust the process to get closer to achieving desired outcomes. This should occur at least every 1-2 years.

Thank you for the comment. IDOT has already begun to develop and review lessons learned from the recent outreach efforts and will continue to modify and adjust the tool to maintain its relevance and applicability. IDOT will continue to review the tool and ensure that it is still meeting the needs for which it was developed.

IDOT should publish the data and methodology that is used in the DDD tool.

AADT - We recommend elimination of the AADT measure as it is only a measure of current conditions and does not tell us about the benefits that the project will generate. Instead, we recommend measuring: increase in corridor total (multimodal) person throughput attributed to the project, which will serve as a true measure of the capacity of the project to provide mobility to people. This approach can be undertaken once the statewide travel demand model is complete, potentially in a future iteration of the process. We recommend use of the Virginia SMART SCALE (Appendix B) method that estimates the future no-build vs build scenario. Until this alternative can be implemented, we recommend elimination of this measure.

Thank you for the comment. AADT is only one criteria that is used to review and analyze projects. IDOT understands that there are other methods available to determine throughput when considering capacity. IDOT still sees AADT to be a useful measure of capacity when weighing projects and their ability to mitigate existing congestion. The department is working on developing processes for developing predictive measures and anticipates the tool to be updated as those resources are finalized.

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Change in annual VMT - This measure should estimate the future change in VMT anticipated as a result of the project, prioritizing projects that fill mobility needs while reducing VMT. Projects that provide more multimodal mobility for people to move along a corridor while decreasing VMT would be optimal in terms of equity, environmental impacts and affordability of the system. The currently proposed measure to provide more points for projects in counties with higher VMT forecasts will have the impact of increasing VMT and environmental impacts of transportation, running counter to the State's climate goals.

We also request that this criterion include a calculation of induced demand that will be created by developing new highway capacity. Illinois could use the assumptions from an induced demand calculator from another state such as California or Colorado.

Thank you for the comment. IDOT understands the importance of other modes of transportation. The Tool was designed specifically for roadway capacity projects. In the future IDOT will explore ways that access to other modes of transportation can be considered when evaluating projects.

Travel time index - We recommend that instead of a travel time index, IDOT use a planning time index, a measure of system reliability, given that predictable travel times are most important to travelers. we recommend that in the future IDOT use a measure of reduction in person hours of delay, a mode-neutral measure that will assess the potential benefit of the project. An approach to calculating this measure is detailed in the Virginia SMART SCALE technical guide (Appendix B).

Thank you for the comment. As criteria continue to evolve IDOT will continue to look at other agency measures and criteria to determine delay to see if they are relevant to the IDOT tool.

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Number of fatal and injury crashes in the project area - This should be a measure of the forecasted change in fatal/injury crashes projected as a result of the project, not the existing conditions in the study area. There should be a focus on improving safety and comfort for all users of an IDOT facility, including people biking and walking. The anticipated safety improvement of a project can be calculated based on the elements of a project for which crash modification factors exist, the extent to which VMT will decrease and thus reduce exposure and crash rates, and/or the "complete streets" elements (new or improved bike/walk/transit facilities) that will make non-auto trips safer and/or shift trips to these safer modes, as detailed in this Guidebook for Using Safety as a Project Prioritization Factor.

We would also suggest an additional criterion to disaggregate crashes in which pedestrians or cyclists are injured.

Thank you for the comment. Safety is a top priority for IDOT. The use of existing conditions in regard to fatal and injury crashes is to provide priority for projects that have existing safety concerns that can be addressed under the capacity improvement proposed. The solutions for crash reduction are only considered once the project has been selected, for example, the proposed scope of the project is evaluated on how it impacts safety concerns. The tool is limited to capacity improvement projects and does not include other modes of transportation; however, the department is committed to continuing to evaluate how other modes may be included.

National Highway Freight Network - In isolation, this measure does not tell us about the extent to which the project would improve travel conditions. Therefore, we recommend the criterion be modified to be a measure of the anticipated improvement in travel time reliability/level of efficiency on the national freight network resulting from the project. An input to this calculation could be federal truck speed data.

Thank you for the comment. Currently the department does not have the capacity to forecast improvements in travel time reliability but is working to develop those resources. IDOT has already begun to develop and review lessons learned from the recent outreach efforts and will continue to modify and adjust the tool to maintain its relevance and applicability.

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Major Development - We recommend that this measure be replaced by a new multimodal access measure described below. Use of this measure as proposed is too likely to result in unanticipated consequences, such as high ratings to greenfield projects that result in significant destruction of natural areas or support of projects that will have many negative externalities to communities.

Thank you for the comment. The concern of further developing natural areas and greenfield projects could be further identified and scored through the environmental analysis and the anticipated environmental processing. IDOT will continue to review the tool and ensure that it is still meeting the needs for which it was developed.

Intermodal accessibility - For this measure, points should not be awarded only for proximity to existing facilities - the project sponsor should describe how it will benefit operations/efficiency of transport to the intermodal facility in order to receive points.

Thank you for the comment. IDOT has already begun to develop and review lessons learned from the recent outreach efforts and will continue to modify and adjust the tool to maintain its relevance and applicability. IDOT will continue to review the tool and ensure that it is still meeting the needs for which it was developed.

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An overarching consideration is that equity should be prioritized as a primary goal of this process and individual equity criteria should not only be embedded within the environmental impacts/livability section. Equity should be measured separately via multiple criteria, such as anticipated reductions in transportation costs for low-income households, reducing air pollution in communities near major highways, and increasing accessibility to jobs for low-income communities of color. For the "Environmental Justice" equity-oriented measure proposed, we suggest this be considered a livability benefits measure. We wish to highlight that conducting only a buffer analysis around the project area to calculate the EJ population within a certain distance of the proposed project will not provide an indication of the amount of benefits that population will receive from the project nor the negative impacts that may result (i.e. noise, vibration, air quality, safety) from a project that would harm them. We believe the approach should at a minimum include both a benefit and burden measure. Ideally the benefit measure could include both proximate population and some estimate of expected use of the facility. Measures of burden should account for all negative impacts of transportation facilities, and should consider both cumulative impacts of other past and ongoing projects as well as underlying population vulnerabilities. The relevant IDOT District should report that if the project is in an EJ area, and to get full points for the project, they must provide examples of engagement that has occurred with EJ communities and how that has informed project development.

Thank you for the comment. IDOT is still developing the criteria to evaluate equity. Your suggestions will be reviewed as IDOT continues to develop that criteria to include within the Tool.

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Level of Environmental Analysis Required - We recommend that future scoring go beyond the category of environmental analysis required (CE, EA, or EIS) and instead calculate the amount of sensitive natural areas that will be affected by the project, as is the case for Virginia SMART SCALE. We recommend the criterion be changed to: measure of the sensitive land affected within a buffer of the project and that points be subtracted from the score based on total potential sensitive acreage impacted. Once a travel demand model is available, IDOT should seek to also measure the impact to natural areas that is anticipated to occur based on future development.

Thank you for the comment. This tool uses the environmental analysis as a measure as it is inferred that the level of impact to environmental resources corresponds directly to the environmental processing. IDOT will continue to evaluate the tool and its measures for weighting projects and continue to review other agency's measures as necessary to ensure that the tool meets the expectations for project selection.

Access to transit - We request that instead of this measure, an access measure be developed that calculates multimodal accessibility (see below).

Thank you for the comment. The Department will be looking at accessibility as a measure as we continue to develop the tool and other resources.

H&T cost index - We would like to engage in more discussion about how this measure would be used as it is not clear at this point. We suggest that priority be given to projects that reduce transportation and housing costs for residents in the project area, most likely by reducing the need for car ownership by providing other transportation options.

Thank you for the comment. We will reach out to discuss as we evaluate this potential metric.

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Equity/Emissions - note that this criterion is fundamentally at odds with a program that narrowly focuses on adding general purpose lanes to state highways, since any roadway expansion will increase these emissions over time. In order for this criterion to be meaningful, it must be applied in a context where multimodal projects are eligible to be funded by the relevant funding source.

Emissions of particulate matter should be part of the overall emissions calculations - the calculations should be done separately for both the overall population affected by emissions and EJ populations, so differential impacts can be understood. A project should receive a point deduction if a large EJ population would be negatively impacted by particulate matter/emissions. These calculations must also include a separate measure of forecasted greenhouse gas (GHG) emissions. Projects should receive fewer or no points if they increase GHGs. If a project reduces overall emissions (i.e. shifts trips to low and zero-emissions modes) it should receive points based on the extent of the reduction.

Thank you for the comment. IDOT is still developing the criteria to evaluate equity and emissions. Your suggestions will be reviewed as IDOT continues to develop that criteria to include within the Tool.

Resiliency - We suggest that a project not receive points only because it's located in an area that has sustained storm damage in the past 30 years. Indeed, the fact that a project is in an area prone to flooding may indicate that it should NOT be built. At a minimum, information should be provided by project sponsors on how it will be designed to reduce flooding in nearby areas by retaining water within the facility - such as through the installation of green infrastructure - and in a way that will withstand forecasts of higher rainfall and flooding, to receive points.

Thank you for the comment. IDOT is using emergency event information that has been developed as part of the FHWA Part 667 requirements.

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Regional rating - It is important that this rating not be developed solely by IDOT district staff - scoring should include at a minimum full engagement with the metropolitan planning organizations (MPOs) and local jurisdictions in the area. This is also an opportunity for additional public engagement, including with equity stakeholders.

Thank you for the comment. IDOT district staff regularly meets with MPOs and local jurisdictions and their input will be taken into consideration for the regional rating. As the tool continues development, formal input from local jurisdictions will be evaluated.

The most important measure of transportation's value is its ability to enable people to access destinations where they can meet their daily needs. This includes both non-work and work destinations. Therefore, we believe it is critical that the criteria include a measure of accessibility.

In summing available opportunities, it makes sense to count those that are easily reached more than those that are harder to reach, a technique similar to the gravity model used in travel demand models. By "decay weighting" opportunities based on travel behavior, we can produce metrics that include all the reasonably available opportunities, rather than excluding those beyond an arbitrary travel time threshold, and we can talk in terms of "the number of jobs accessible," without an arbitrary time cutoff.

The accessibility measure should be calculated both for all users and for EJ populations to demonstrate the extent to which accrual of those benefits differs from the population overall. If the project benefits EJ populations less, it should receive fewer points.

Thank you for the comment. IDOT is continuing to evaluate the criteria and metrics used to weigh projects and is still developing criteria for evaluating and weighting equity. Accessibility is a metric on our radar and we have been gathering information.

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We recommend that an additional measure be added to enable comparison of benefits as related to the project costs. This will encourage each project to deliver the highest level of benefit for the public dollars invested. A relatively easy way to do this would be to follow the example of Virginia's SMART SCALE and divide the total points awarded to the project by the costs, yielding a points per dollar measure.

Thank you for the comment. The department does calculate that measure and use as a subjective measure when looking at the scores.

We recommend that IDOT work toward development of a tool to coordinate land use and transportation so that an assessment of future transportation-efficient land use is possible. Virginia's SMART SCALE is a good example.

Thank you for the comment. As criteria continue to evolve IDOT will continue to look at other agency measures and criteria to determine delay to see if they are relevant to the IDOT tool.

We recommend that IDOT take an iterative process sharing the revised criteria and asking for weighting at that point. At an overarching level, we believe that safety, equity, and environmental impacts are very high priorities, and should be weighted accordingly. We encourage you to allocate significant weight to these categories, especially in relation to the remainder divided among economic development, traffic/congestion, and 'regional rating'. We encourage IDOT not to weight congestion too heavily, particularly before the Data-Driven Decisions Tool can mature into considering other modes' ability to address congestion, air pollution and greenhouse gas emissions.

Thank you for the comment.

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Annual Average Daily Traffic (AADT) and Change in Annual Vehicle Miles Traveled (AVMT) CMAP feedback: AADT and AVMT capture if a road use has changed, but not if that level of use is problematic. Roads with chronic issues may be missed and may result in the focus being placed on areas with greenfield development. This runs counter to ON TO 2050's goals to support infill development and inclusive growth. CMAP recommends incorporating measures of reliability such as the Planning Time Index and Level of Travel Time Reliability (described below) to better capture the need for system enhancements.

Thank you for the comment. AADT is only one criterion that is used to review and analyze projects. IDOT understands that there are other methods available to determine throughput when considering capacity. As criteria continue to evolve IDOT will continue to look at other agency measures and criteria to see if they are relevant to the IDOT tool.

Travel Time Index (TTI) CMAP feedback: The Travel Time Index (TTI) provides a useful but incomplete picture of congestion. In addition to TTI, CMAP uses Planning Time Index and Level of Travel Time Reliability to measure system reliability. Northeastern Illinois's road network is forecasted to continue to be congested. ON TO 2050 seeks to improve the reliability of the system, rather than solely focusing on reducing congestion.

Thank you for the comment. As criteria continue to evolve IDOT will continue to look at other agency measures and criteria to determine delay to see if they are relevant to the IDOT tool.

The most effective safety strategy for reducing fatalities is changing roadway design to reduce speeding and protect pedestrians and cyclists, who are the most vulnerable users of the transportation network. Special care should be taken not to increase capacity in a way that results in unsafe speeds and more injuries or fatalities. Projects should be compared on the crash rate or potential to reduce crashes rather than the raw number of crashes. We recommend IDOT invest in improved safety data collection.

Thank you for the comment. Safety is a top priority for IDOT. This tool uses crash frequency to identify projects and give higher priority to projects that have frequent major crashes. Major crashes are defined as those that result in death, incapacitating injury, and non-incapacitating injury. The tool does not identify how the project will improve safety, as that is identified after the tool scoring is complete. It is used to identify corridors and routes that have had major crash frequency.

DATA-DRIVEN DECISIONS COMMENTS AND RESOLUTIONS

National Highway Freight Network - in D1 the freight network often intersects with low-income communities and has historically created safety, air quality and other negative impacts locally. Extra care should be taken to not increase impacts on existing environmental justice communities through this scoring. One way to do this could be to zero out points for this criterion if the project is determined to add new burdens. On the other hand, if the project will add new benefits (e.g., forecasted decrease in congestion/idling time, movement of trucks off residential streets), the criterion could stand and potentially be weighted more strongly.

Thank you for the comment. Equity criteria and measures are still being developed and will be incorporated as the tool continues to evolve.

Major Development - We recommend limiting this metric to roads on the NHS or designated truck routes to within three miles and defining what constitutes a "major development." CMAP suggests including metrics aligned with the state's five-year economic development plan coordinated by the Department of Commerce and Economic Opportunity. Including "high-quality" job retention and creation would also strengthen the relationship between transportation investments and economic development. High quality jobs could be measured using the Massachusetts Institute of Technology's Living Wage Calculator which provides county-level wages required to meet minimum standards given the local cost of living.

Thank you for the comment. IDOT will continue to examine the Tool and how it meets the Department's goals and expand it if needed.

DATA-DRIVEN DECISIONS COMMENTS AND RESOLUTIONS

Intermodal Accessibility - Prioritizing projects serving intermodal facilities is important; however, projects within three miles of an intermodal facility, may or may not impact the intermodal facility. Consider additional criteria that would reflect the actual impact of a project on freight movement, such as vertical and horizontal clearances, turn radii, and other geometric features.

Thank you for the comment. IDOT is continuing to evaluate the criteria and metrics used to weigh projects and is still developing criteria. Your comment will be reviewed as project metrics and criteria are reviewed.

Environmental Justice - the proposed tool outlines one environmental justice criterion related to the location of the project within environmental justice communities as defined by IEPA. While this is a useful measure, it is important to also balance it with the fact that environmental justice populations may benefit from facilities located outside their immediate home areas. For this reason, CMAP considers inclusive growth our own performance criteria by including both the location and the users of a facility. This assessment requires extra modeling but has proven to be an important metric for leveraging CMAP's programming evaluation process to advance equity goals.

Thank you for the comment. IDOT is still developing the criteria to evaluate equity. Your suggestions will be reviewed as IDOT continues to develop that criteria to include within the Tool.

DATA-DRIVEN DECISIONS COMMENTS AND RESOLUTIONS

Transportation investments have a critical role to play in stimulating equitable reinvestment in disinvested areas. For this reason, project selection, in northeastern Illinois, should consider projects that support development in existing areas that are infill supportive. Infill makes communities more livable and sustainable by promoting walkability, housing and transportation choices, as well as access to schools, jobs, services, and basic amenities. CMAP divides northeastern Illinois into 3 categories based on the existing levels of infill supportiveness.

Several other data considerations are also worth raising related to the proposed EJ and equity criteria: the definition of an EJ community should be expanded beyond low-income and minority populations to include other groups that have been historically marginalized in the transportation planning process specifically. Groups to consider include immigrant and refugee populations, people living with disabilities, limited English proficiency populations, youth and seniors; data should be disaggregated to the greatest extent feasible while maintaining privacy; qualitative data obtained from public engagement activities should be easily accessible and how that data informs the data-driven decision-making process should be transparent.

Thank you for the comment. We will consider this as we evaluate potential revised or new criteria. The methodology for all the criteria and goals will be published for transparency, this includes how environmental justice and equity are being considered within the DDD tool.

DATA-DRIVEN DECISIONS COMMENTS AND RESOLUTIONS

Resiliency - Beyond existing storm and floodplain requirements, this criterion should add an additional component that favors preservation of green infrastructure. It would be prudent to consider natural areas affected by an expansion, as natural areas offer green infrastructure benefits as well. For projects in metropolitan Chicago, IDOT can apply the green infrastructure vision dataset that CMAP developed with partners.

Thank you for the comment. As IDOT continues to evaluate the tool, other agency's measures and criteria will be reviewed.

Emissions - Since the tool only deals with capacity projects, it is likely that these projects will only increase overall emissions statewide. In non-attainment areas like northeastern Illinois and East-West Gateway MPO, emissions should consider both greenhouse gas emissions, which will require additional investments, as well as particulate matter. There also are opportunities to address pollution issues in EJ communities.

This measure could evaluate whether user-fees or congestion management could keep vehicles off the road, but it makes more sense overall to consider this criterion in IDOT's multimodal investments.

Thank you for the comment. IDOT is still developing the criteria to evaluate emissions. Your suggestions will be reviewed as IDOT continues to develop that criteria to include within the Tool.

DATA-DRIVEN DECISIONS COMMENTS AND RESOLUTIONS

Regional Rating -Illinois' metropolitan planning organizations (MPOs) play a critical role in transportation funding, and inclusion in their long-range transportation plan should be required. It is vital that the capacity projects evaluated with this tool advance the local MPO's system condition and performance targets. New capacity projects that are not included in the MPO's long range plan should not be considered for funding within the IDOT Multi-Year Plan.

Thank you for the comment. IDOT District's are encouraged to coordinate with their local MPO's to determine a project's regional rating. As IDOT continues to refine the Tool, it will review your comment for future consideration.

New capacity is often added to the system as only part of a project's goals. Projects that address capacity as part of a larger lifecycle reconstructing should be scored differently than capacity projects that stand alone. While it can be difficult to separate, identifying the portion of a project that is related to capacity can clarify the other goals of the project and the cost effectiveness at achieving those goals.

Thank you for the comment. IDOT will continue to review and refine the metrics and criteria used to evaluate projects for funding.

Changing how roads are managed and operated, rather than expanding the system, should be the first option in considering how to improve reliability in the region. In addition, enhancing operations is often more cost effective. Including measures of cost effectiveness can help direct limited dollars toward the most productive uses.

Thank you for the comment. The department will take it under advisement.

DATA-DRIVEN DECISIONS COMMENTS AND RESOLUTIONS

Input on criteria to use: political influence/feedback; cot of project; long term maintenance cost of projects; leveraging other state/fed/local funding for projects; different weights for regions of state; return on investment; EDP-ability to create new development in the future; tourism; priority corridors

Thank you for the comment. IDOT continues to look at ways to refine the tool and metrics and criteria to use in order to ensure it is meeting the intent of project funding selection.

Equity -

Does the project add access to get people to job, hospitals, shopping, etc.
Does the project connect other projects or roads together
Coordination with multimodal connections and how they connect to each other

Thank you for the comment. IDOT is still developing the criteria to evaluate equity. Your suggestions will be reviewed as IDOT continues to develop that criteria to include within the Tool.

Look at other states to see what they are doing
Seek feedback from districts
How does the delivery of projects play into it - Design Build, P3, bundling
Look at other areas that use data driven decisions

Thank you for the comment. As criteria continue to evolve IDOT will continue to look at other agency measures and criteria to see if they are relevant to the IDOT tool and in determining weighting and project selection.