



24 November 2021

Ms. Holly Bieneman  
Illinois Department of Transportation  
Hanley Building  
2300 S. Dirksen Parkway  
Springfield, IL 62764  
*Submitted electronically to DOT.STIP@Illinois.gov*

Re: Proposed Illinois DOT Data-Driven Decisions Tool

On behalf of the undersigned organizations, we are writing to provide comments on the Illinois Department of Transportation’s proposed Data-Driven Decisions Tool. **The Illinois legislature’s goals in passing the legislation requiring this Tool’s development—and IDOT’s goals in implementing it—are admirable, in particular the imperative to “reduce disparities in transportation system performance experienced by racially marginalized communities, low-income to moderate-income consumers, and other disadvantaged groups and populations identified under the Environmental Justice Act” (“impacted communities,” for short).** We also applaud the focus on safety and on reducing the environmental harms of highway investments (including but not limited to climate change impacts). IDOT’s leadership in developing data-driven project prioritization criteria and a transparent community engagement process has the potential to create transformative and positive change in the state’s transportation investment program.

**Unfortunately, the proposed Tool will fail to achieve these safety, environmental, and equity goals—instead, the proposed Tool’s application will increase climate pollution, directly undermining these goals and the State’s recent leadership on climate policy and environmental justice more broadly.** This highly consequential Tool will ultimately guide billions of dollars in public spending, and it is essential that IDOT work closely and iteratively with key stakeholders, and particularly those impacted communities, to ensure that the tool’s application advances the State’s goals. Our primary concerns, spelled out in more detail below, are as follows:

1. IDOT cannot advance equity or environmental justice without affirmatively including stakeholders from impacted communities in the program design and decision-making process. With public engagement to date consisting of a single digital webinar and four-week public comment period, with no commitment to further engagement beyond responding to comments received, IDOT has not honored the enabling legislation’s mandate to consult relevant stakeholders in the program design. **IDOT should design a collaborative and iterative process including (and compensating for their time) people and organizations representing the communities identified under the Environmental Justice Act. IDOT**

should also follow the examples set by Virginia DOT’s “SMART SCALE” program and NCDOT prioritization program<sup>1</sup> by instituting a recurring annual review of the adopted criteria, with an oversight committee established that includes representation from these impacted communities.

2. If IDOT applies this Tool only to projects that would add general purpose lane-miles to the state highway system, there is no prospect for this program to advance equity, climate change, safety, or environmental justice goals. Broadly speaking, and taking inspiration from Virginia’s SMART SCALE program, a consistent and multimodal prioritization approach reflecting the State’s climate, equity, safety, and other goals should ultimately be applied to all IDOT’s transportation investments. **A necessary but not sufficient remedy to this problem would be to define “...transportation assets that add capacity” as inclusive of any project that increases the potential *person-throughput* of state-owned or state-managed public rights-of-way (i.e., accounting for the ‘capacity’ of walking, biking, and public transit priority infrastructure), rather than the current approach, which more narrowly considers *vehicle-throughput* alone.** This more holistic definition is necessary for this Tool to “consider emissions” as well as to “reduce disparities in transportation system performance...” as required by the relevant statute.
3. The proposed Tool cannot achieve the statutory goal “...to select projects through an evaluation process,” because the proposed Tool does not evaluate proposed projects. At its core, the development of this Tool presents an opportunity to better align future transportation system outcomes with the State’s goals—yet the Tool’s approach would narrowly evaluate existing system conditions, failing to consider future, project-specific impacts. This approach will fail to achieve the Tool’s purpose, and furthermore would serve to reinforce an unjust, high-polluting, and unsafe status quo rather than to begin to align future investments with the State’s stated goals. **IDOT should evaluate projects based on their anticipated impact on the transportation system, and the extent to which that anticipated impact aligns with state climate, equity, and safety goals.**
4. Equity is currently included only as a sub-criteria within the “Environmental Impacts/Livability” goal area, but its critical importance, cross-cutting implications beyond Environmental Impacts, and multi-dimensional nature require that it be elevated as its own goal area. **IDOT should add equity—and specifically, racial and social equity – as a topline goal, and ensure that all evaluation criteria are aligned in advancing a safe, equitable, and zero-emission transportation system.** This approach should include disaggregation of all applicable Tool criteria by (at a minimum) race and income to understand potentially varying outcomes for impacted communities, following the example of Virginia’s SMART SCALE program. Several of the proposed evaluation criteria are directly contradictory with IDOT’s stated goals, as well as contradictory with each other—indicating that IDOT must also make holistic revisions to the proposed criteria in order to ensure consistency with IDOT’s goals.

From 1998 to 2018, Illinois’ increase in greenhouse gas emissions from transportation (12 million metric tons) has almost exactly undone the electric power sector’s 12.2 million metric ton decrease in emissions. As of 2016 transportation has become the state’s single largest source of greenhouse gas emissions, at more than a third of Illinois’ fossil fuel–related emissions, which are primarily attributable to on-road light- and heavy-duty vehicles.<sup>2</sup> With two regions (Chicago Metropolitan Area and Metro East St. Louis area) in

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<sup>1</sup> North Carolina DOT, 2021 (<https://connect.ncdot.gov/projects/planning/pages/prioritizationresources.aspx>) Accessed 22 Oct 2021

<sup>2</sup> U.S. Energy Information Administration, <https://www.eia.gov/environment/emissions/state/> Accessed 1 Nov 2021

nonattainment with National Ambient Air Quality Standards<sup>3</sup>, reducing transportation sector emissions will be an essential component of any holistic state climate action plan.

Thankfully, several other states have developed comparable project prioritization programs and climate strategies, several of which have documented lessons for IDOT to learn from—for example Virginia’s [‘SMART SCALE’ program](#) (see also [this TRB overview presentation](#) from Virginia DOT’s Chad Tucker), California’s proposed [‘CAPTI’ plan](#), the [‘Recommendations for MassDOT Project Selection Criteria’](#), and the USDOT-funded Center for Transportation Equity, Decisions, and Dollars (CTEDD) report on [‘Modern Project Prioritization for Transportation Investments’](#). Learning from the lived experience of community members in Illinois as well as the lessons taken from peer agencies’ experience has the potential to strengthen the State of Illinois’s leadership on climate, equity, and environmental justice. Without taking the time to learn from these experiences and accounting for the decades of rigorous study and lived experience that underpin them, Illinois will perpetuate an inequitable and unjust, polluting, and unsafe status quo.

Thank you for considering our comments. We would welcome the opportunity to further discuss the process and technical improvements we have requested. Please contact J.C. Kibbey at NRDC ([jkibbey@nrdc.org](mailto:jkibbey@nrdc.org)) with questions.

Sincerely,

Active Transportation Alliance



Climate Reality Project – Chicago Metro Chapter



Environmental Defense Fund



Illinois Environmental Council



Illinois PIRG



Little Village Environmental Justice Organization (LVEJO)



NRDC (Natural Resources Defense Council)



Sierra Club – Illinois Chapter



Transportation for America



Union of Concerned Scientists



<sup>3</sup> Illinois Department of Transportation, <https://idot.illinois.gov/transportation-system/environment/index> Accessed 1 Nov 2021

*Detailed comments follow:*

**1. IDOT must develop an inclusive process to design the Data-Driven Decisions program before making claims to advance equity or environmental justice. This process should include multiple rounds of input, a collaborative approach to program design, and compensation for deep consultation in communities who have historically been harmed by environmental and transportation system injustices.**

A central pillar of advancing equity—specifically meaning racial and social equity, i.e. ensuring policy and program co-creation with, ensuring targeted benefits to, and minimizing harms among impacted communities, especially low-income communities of color—and environmental justice is including impacted communities in the policy or program design process. The Spectrum of Community Engagement to Ownership<sup>4</sup> provides more detail on moving toward more inclusive modes of working with community. One approach with strong and growing precedent at the municipal and state levels would include convening a committee with strong representation from the impacted communities who IDOT seeks to benefit via the Data-Driven Decisions process. For example:

- If IDOT staff have not done so already, they should consult with the Illinois EPA’s Commission on Environmental Justice to determine an appropriate strategy to engage with environmental justice communities to advance environmental justice.<sup>5</sup>
- Initiated in 2018 and launched in 2019, the Seattle Department of Transportation (SDOT) has established a standing “Transportation Equity Workgroup” composed of “[ten] compensated community members from communities historically and currently underinvested by government”<sup>6</sup>, who are compensated for their time and have been engaged by SDOT on a variety of transportation policy issues, including an ongoing effort to develop a comprehensive transportation equity framework to holistically guide the City’s transportation policy and investments.
- In IDOT’s own backyard, the Chicago Department of Transportation (CDOT) worked in direct partnership with community organizations via the Chicago-based [Transportation Equity Network](#) (TEN) to inform the agency’s recently-published [strategic plan](#). TEN engaged directly with CDOT decision-makers to inform the plan’s goals and provide feedback during iterative rounds of review—to demonstrate that their feedback had been heard and addressed—before finalizing the plan.
- At the state level, the Minnesota DOT has convened a “Sustainable Transportation Advisory Council”, which met regularly and delivered specific recommendations to inform the state’s transportation climate priorities.<sup>7</sup> IDOT could convene a similar group, ensuring strong representation from “...racially marginalized communities, low-income to moderate-income consumers, and other disadvantaged groups and populations identified under the

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<sup>4</sup> González, 2020 ([https://www.facilitatingpower.com/spectrum\\_of\\_community\\_engagement\\_to\\_ownership](https://www.facilitatingpower.com/spectrum_of_community_engagement_to_ownership)) Accessed 22 Oct 2021

<sup>5</sup> Illinois Environmental Protection Agency, 2021 (<https://www2.illinois.gov/epa/topics/environmental-justice/commission/Pages/default.aspx>) Accessed 1 Nov 2021

<sup>6</sup> Seattle DOT, 2021 (<https://www.seattle.gov/transportation/projects-and-programs/programs/transportation-equity-program/equity-workgroup>) Accessed 22 Oct 2021

<sup>7</sup> Minnesota DOT, 2021 (<https://www.dot.state.mn.us/sustainability/advisory-council.html>) Accessed 22 Oct 2021

Environmental Justice Act”, and compensating participants fairly for their time in order to ensure that all are able to participate.

- Numerous additional examples have been documented by the Federal Highway Administration<sup>8</sup> and National Cooperative Highway Research Program<sup>9</sup>

IDOT could also leverage a similar advisory body to follow the examples set by Virginia DOT’s “SMART SCALE” program by instituting a recurring annual review of the adopted criteria, with an oversight committee established that includes representation from these impacted communities. North Carolina DOT has led a similar annual review and revision process for its state prioritization process—currently in its sixth iteration.<sup>10</sup>

## **2. IDOT must define ‘capacity’ more expansively in order to advance equity, climate, safety, and environmental justice goals**

A robust and growing body of DOT experience and scientific literature has emerged in recent decades that makes clear that adding general purpose traffic lanes to existing highways does not alleviate traffic on long-term planning horizons.<sup>11</sup> The historical harms and injustices perpetuated by highway construction and later expansions are well-documented<sup>12</sup>, as are the environmental justice and broader public health damages caused by pollution from personally-owned vehicles and goods movement, including in Illinois specifically.<sup>13</sup> Expanding highways will increase vehicle miles traveled (VMT), running counter to the State’s and a variety of Illinois local governments’ climate goals, as reflected, for example, in the [State’s participation in the Climate Alliance](#) (Accessed 22 Oct 2021)—committing Illinois to reducing statewide greenhouse gas emissions 26 percent by 2025, relative to a 2005 baseline—as well as the Metropolitan Mayors Caucus’s recent [2021 Climate Action Plan for the Chicago region](#) (Accessed 22 Oct 2021), which includes an explicit target to reduce VMT.

Further, other states’ experiences in developing comparable performance-based project prioritization programs has suggested that a more holistic, multimodal approach is necessary for success. In a synthesis review of existing DOT project prioritization programs, for example, researchers at the USDOT-funded Center for Transportation Equity, Decisions, and Dollars (CTEDD) recommend applying prioritization processes to “flexible funding programs”, to ensure that investments are holistically aligned with State and agency goals.<sup>14</sup> c

In the meantime, IDOT can take an important step in the right direction by more broadly defining ‘capacity’ as ‘person-throughput’ rather than the current, narrower definition that only considers

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<sup>8</sup> FHWA, “Context Sensitive Solutions and Design” (<https://www.fhwa.dot.gov/planning/css/>) Accessed 1 Nov 2021

<sup>9</sup> Aimen and Morris, “Practical Approaches for Involving Traditionally Underserved Populations in Transportation Decisionmaking”, 2012 (<https://www.trb.org/Publications/Blurbs/166872.aspx>) Accessed 1 Nov 2021

<sup>10</sup> See North Carolina DOT, 2021 (<https://connect.ncdot.gov/projects/planning/pages/prioritizationresources.aspx>) Accessed 22 Oct 2021

<sup>11</sup> See, for example: Volker, Lee, and Handy, 2020 (<https://sci-hub.tw/10.1177/0361198120923365>) Accessed 22 Oct 2021; Downs, 1962 (<https://trid.trb.org/view/694596>) Accessed 22 Oct 2021; RMI, 2021 (<https://shift.rmi.org/>) Accessed 22 Oct 2021

<sup>12</sup> See, for example: Blakemore, 2021 (<https://www.washingtonpost.com/history/2021/08/16/interstate-highways-were-touted-modern-marvels-racial-injustice-was-part-plan/>) Accessed 22 Oct 2021; Peterson, 2021 (<https://themetropole.blog/2021/04/05/the-myth-and-the-truth-about-interstate-highways/>) Accessed 22 Oct 2021

<sup>13</sup> See Geertsma, 2018 (<https://www.nrdc.org/experts/meleah-geertsma/new-map-shows-chicago-needs-environmental-justice-reforms>)

Accessed 22 Oct 2021, for an analysis and discussion of these issues in Chicago; see American Public Health Association, 2021

(<https://www.apha.org/topics-and-issues/transportation>) Accessed 22 Oct 2021, for a series of case studies, including one with the Delaware DOT focused on project prioritization ([https://www.apha.org/-/media/Files/PDF/topics/transport/2017\\_THT\\_Delaware.ashx](https://www.apha.org/-/media/Files/PDF/topics/transport/2017_THT_Delaware.ashx)) Accessed 22 Oct 2021

<sup>14</sup> CTEDDD, 2021 ([https://ctedd.uta.edu/wp-content/uploads/2021/03/Novce\\_ProjectPrioritization\\_Report\\_CTEDD.pdf](https://ctedd.uta.edu/wp-content/uploads/2021/03/Novce_ProjectPrioritization_Report_CTEDD.pdf)) Accessed 22 Oct 2021

vehicle-throughput, for example drawing on research from the National Association of City Transportation Officials (NACTO).<sup>15</sup> This would enable highway projects that increase multimodal capacity to compete on at least equal footing with projects proposing to add general purpose lanes, which is a prerequisite for the possibility of reducing transportation emissions through Illinois’s transportation investments, advancing equity, and improving traffic safety for all road users.

### **3. IDOT must evaluate expected project outcomes to advance future-oriented goals**

If this program’s intent is to clearly and transparently manage trade-offs to ensure the effective use of taxpayer dollars in Illinois, then this can only be accomplished by weighing the anticipated outcomes of each proposed project—outcomes that the currently-proposed prioritization approach does not consider. This is another key recommendation from the CTEDD report cited above—to “evaluate key outcomes”.<sup>16</sup>

The current approach, which focuses instead on comparing existing system conditions, cannot realize the intended purpose of the enabling legislation. First and foremost this is because one fundamentally cannot compare proposed transportation projects without estimating the degree to which those projects are likely to solve the problems posed by the existing transportation system. By measuring only existing conditions, IDOT’s current proposal would only, in effect, measure existing problems.

Second, an emphasis on existing conditions would create incentives that run counter to the State’s stated goals. For example, take the criteria of AADT: by simply prioritizing highway capacity projects where AADT is already high, IDOT would be prioritizing highway capacity projects primarily in and around Chicago, where the State’s interests in safety, equity, emissions reductions, fiscal responsibility, and moving more people more efficiently would all be better served by investing in improved public transit, biking, and walking infrastructure.

### **4. Equity should be a standalone goal with its own sub-criteria, and IDOT should holistically align criteria to ensure internal consistency and goal alignment in future project evaluations**

The proposed program’s stated goals are reasonable in theory, but as translated to the specific proposed criteria, they are currently conflicting in practice. With limited exceptions, a proposed project should not be prohibited from scoring points in one category by meeting the criteria in another. Where such conflict exists, it reflects a lack of consistency in Tool criteria.

For example, as currently proposed, each of the “Traffic Operations/Congestion” criteria, National Highway Freight Network criteria, and Environmental Justice criteria could each be judged to be highly competitive on a highway-widening project through Chicago’s South Side. Yet such a project would also necessarily score poorly on its pollution impacts, and it would furthermore be highly likely to exacerbate environmental justice issues. Inconsistencies like this suggest that IDOT must make holistic revisions to the proposed criteria in order to ensure consistency with IDOT’s goals.

Equity is a key stated goal for IDOT, and it should be elevated to reflect its critical importance (1) by adding equity as a topline goal area, rather than as a sub-criteria within the Environmental Impacts/Livability category, and (2) by disaggregating all applicable Tool criteria by, at minimum,

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<sup>15</sup> NACTO, 2021 (<https://nacto.org/publication/transit-street-design-guide/introduction/why/designing-move-people/>) Accessed 22 Oct 2021

<sup>16</sup> CTEDD, 2021 ([https://ctedd.uta.edu/wp-content/uploads/2021/03/Noyce\\_ProjectPrioritization\\_Report\\_CTEDD.pdf](https://ctedd.uta.edu/wp-content/uploads/2021/03/Noyce_ProjectPrioritization_Report_CTEDD.pdf)) Accessed 22 Oct 2021

race and income, to ensure an appropriately comprehensive equity evaluation approach, following the example of the Virginia SMART SCALE program. Specific equity criteria, as well as the holistic disaggregation approach, should be co-created with impacted communities.

Finally, in order to directly benchmark each criteria across different types of projects, IDOT should index each project by dividing estimated criteria outcomes by project cost, which will provide an estimated “return on investment”, which can then be more meaningfully compared across projects. This approach also follows the example of the Virginia SMART SCALE program and would follow the guidance of the CTEDD study conclusions.

In addition to voicing these high-level concerns, we would like to respond directly to the questions IDOT has posed through its digital survey tool and informational webinar:

- Re: Goal Prioritization, **equity** should be added as a topline goal area, rather than as a sub-criteria within the Environmental Impacts/Livability category
- Re: Weighing each goal’s relative applicability,
  - o The ‘goal-level’ weights (i.e., relative weight of ‘safety’ vs. ‘equity’ vs. ‘economic development’) are important, but the criteria-level weights are at least equally important. More information is required for key stakeholders to weigh in, reinforcing the need for iterative rounds of feedback on the proposed approach.
  - o We believe that safety, equity, and environmental impacts are the highest priority, and should be weighted accordingly. We would allocate at least 25 percent each of the total weight each of these categories—i.e., a minimum of 25 percent to safety; 25 percent to equity; and 25 percent to environmental impacts, with the remainder divided among economic development, traffic/congestion, and ‘regional rating’
  - o For the reasons described above, we do not believe traffic/congestion should be given strong weight, because the balance of scientific evidence to date suggests it is not possible to mitigate congestion via roadway expansions alone.
- Re: input on specific proposed criteria:
  - o Traffic Operations/Congestion
    - **Average Annual Daily Traffic (AADT):** Instead of measuring AADT of the existing transportation system, we suggest measuring the anticipated change in a right-of-way’s person-throughput capacity.
    - **Annual Vehicle Miles Traveled (AVMT):** Measuring IDOT’s forecasted increases in county-level AVMT will not tell IDOT or the public anything about the likely impact of proposed projects. We recommend eliminating this criteria from the “Traffic Operations/Congestion” category entirely, and recommend including likely impact on AVMT as an environmental measure, with greater priority given to projects that are likely to reduce statewide AVMT, as well as appropriate accommodation for rural projects to ensure that statewide transportation investments revitalize rather than neglect rural main streets.
    - **Travel Time Index:** We suggest IDOT table this criteria given the lack of a meaningful baseline and uncertainty regarding long-term impacts on peak versus ‘free-flow’ travel times in the post-COVID era. Furthermore, metrics that prioritize speed are likely to contradict safety goals, and the intent of metrics

like “Travel Time Index” could be better advanced via multimodal accessibility metrics (See: comments on ‘Major Development’, below).

- Safety
  - **Crash frequency:** Crash frequency is a necessary but insufficient safety metric. IDOT should ensure that there is, additionally, a criterion that accounts for crash severity, with an emphasis on fatal or severely injuring crashes. Furthermore, an analysis of the anticipated safety outcomes of proposed projects should include the potential implications of increased traffic on the surrounding street network. For example, added highway capacity could result in more traffic, higher speeds, and/or more conflict points, and therefore increased crash risk not only on the relevant highway corridor but the surrounding street network.
  - We would also suggest an additional criterion to disaggregate crashes suffered by the most vulnerable road users, namely those in which pedestrians or cyclists are injured. Because these crashes are typically less frequent, this criterion should include a longer retrospective time horizon, for example using 5-10 years of data to ensure a more meaningful sample.
- Economic Development
  - **National Highway Freight Network:** Prioritizing capacity expansions along the National Highway Freight Network is likely to exacerbate environmental injustice by increasing already-disproportionate freight traffic through impacted communities. We strongly suggest taking the time to work with community stakeholders to develop a more nuanced approach to avoid exacerbating the problems this program is intended to solve.
  - **Major Development:** A narrow emphasis on existing development could lead to the prioritization of state transportation investments in areas that have already experienced significant public and private investments, reinforcing a ‘winner take all’ development pattern and exacerbating inequitable investment patterns. We suggest instead using economic development criteria that would encourage increases in multimodal access to destinations, which would better align land use and transportation system goals.<sup>17</sup>
  - **Intermodal Accessibility:** Incentivizing the increased ease of goods movement, particularly when moved by heavy trucks, has the potential to exacerbate environmental justice and traffic safety concerns, particularly in low-income communities of color. This criterion should be amended in conversation with communities impacted by heavy freight activity in Illinois to ensure safeguards are enacted to appropriately mitigate those negative impacts.
  - We suggest considering two additional economic development criteria. First, comparing the direct job creation impacts of proposed projects. And second, considering improvements to job access for Illinois residents, a subset of the “access to destinations” suggestion noted under “Major Development” above.
- Environmental Impacts/Livability
  - **Environmental Justice:** To advance environmental justice, any related criteria must be co-created with impacted communities. The proposed criteria (“whether [a] project is located in an area identified as minority population, low-income, or both...”) is unacceptable, since (1) if meeting this criteria would

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<sup>17</sup> See, for example, Virginia’s SMART SCALE technical guidance (<https://smartscale.org/documents/2020documents/technical-guide-2022.pdf>) Accessed 22 Oct 2021, and the State Smart Transportation Initiative’s “Measuring Accessibility” (<https://ssti.us/publications/Measuring-Accessibility-a-Guide-for-Transportation-and-Land-Use-practitioners/>) Accessed 22 Oct 2021, for more on how to apply these criteria.

support a project’s prioritization, then this criteria would undermine environmental justice for the impacted community if that community did not want the project in their community in the first place, and (2) if meeting this criteria would instead work against a project’s prioritization, it would perpetuate a cycle of public disinvestment in low-income and minority communities. Furthermore, the technical definition of impacted or environmental justice communities should be approached with great care—further pointing toward the critical importance of co-creation with those communities—since this technical choice has considerable implications for whether and in which cases prioritized projects will improve outcomes in those communities.<sup>18</sup> The definitions in the Climate and Equitable Jobs Act (CEJA) may also provide helpful guidance: CEJA defined environmental justice communities as those meeting the criteria for either the Illinois Power Agency definition of environmental justice community or communities designated under the Restore, Reinvest and Renew (R3) Program under the state’s recreational cannabis law.

- **Level of Environmental Impact Analysis Required:** This criterion is insufficient to capture the diverse range of potential environmental impacts, which include impacts to the natural environment and a variety of different pollution impacts. Rather than collapsing these all into one criterion, these should be prioritized and listed individually. We would suggest considering natural area impact (as in the Virginia SMART SCALE program), local criteria pollutant impacts (e.g., NOx and particulate matter), and climate pollution (i.e., carbon dioxide equivalent, or estimated AVMT impact as a proxy) over the project’s life cycle.
- **Equity:** Equity is too important to be considered as a subset of the “Environmental Impacts/Livability” category and should instead be its own goal category with sub-criteria of its own. Specific equity criteria should be co-created with impacted communities, but may include criteria like: anticipated reductions in transportation costs for low-income households, reducing air pollution in communities near major highways, and increasing multimodal accessibility between households and jobs in low-income communities of color<sup>19</sup>. In addition, to ensure a holistic equity analysis approach, all criteria should include the disaggregation of impacts by, at a minimum, race and income—following the example of Virginia’s SMART SCALE program, e.g.—to ensure that potential differential burdens and benefits are appropriately considered in the prioritization process.
- Regional rating
  - **Regional Input:** We do not feel we have enough information to evaluate the relative value of this goal or criteria. We do not, however, feel it would be appropriate—as IDOT’s materials seem to indicate—for individual IDOT staff to be charged with making this judgement unilaterally. The implementation of this regional rating could present a valuable opportunity to build equity into the decision-making process by institutionalizing participation—for example, via a standing regional committee—from key impacted communities, other non-

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<sup>18</sup> See, for example, Karner et al., 2020 (<https://journals.sagepub.com/doi/10.1177/0885412220927691>) Accessed 1 Nov 2021

<sup>19</sup> For example, see scoring criteria from the Nashville Area Metropolitan Planning Organization in Meehan and Whitfield, 2017, “Integrating Health and Transportation in Nashville, Tennessee, USA: From Policy to Projects,” (<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5438178/>) Accessed 1 Nov 2021

profit and private sector actors, and the public sector agencies (local governments, MPOs, etc.) identified by IDOT as key stakeholders. Projects should also be consistent and align with goals and priorities included in adopted local and regional transportation plans.

- Resiliency/Emissions
  - **Resiliency:** Resiliency impacts are important to capture, but more detail is necessary in order to evaluate the proposed approach.
  - **Emissions:** Measuring projects' likely emissions impact is important, but should be disaggregated into local air quality impacts (e.g., estimated implications for criteria pollutant concentrations) and climate impacts. This criterion is also fundamentally at odds with a program that is narrowly focused on adding general purpose lanes to state highways, since any roadway expansion will increase these emissions over time. 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.

Thank you again for considering these comments. We stand ready to work with IDOT to address these serious deficiencies to advance the State's safety, equity, and environmental goals.