BLUE RIBBON COMMISSION
on Transportation Infrastructure Funding and Policy

Report to the Illinois General Assembly

Blue-Ribbon Commission on Transportation Infrastructure and Funding

January 28, 2026

Letter from BRC Chair & IDOT Secretary Gia Biagi

Members of the General Assembly,

As the Chair of the Blue-Ribbon Commission on Transportation Infrastructure Funding and Policy (BRC), it has been a pleasure to collaborate over the past year with the BRC Commissioners—a diverse group of legislators, industry representatives, and advocates— along with IDOT leadership and other partners on this critical initiative. This effort served as a catalyst and complement to the forward-thinking and strategic action that is currently underway across the Illinois Department of Transportation.

The BRC set out to identify ways for IDOT to improve project delivery, build new capacity, strengthen operations, and sustainably and equitably meet the future transportation needs of our state. The approach included looking closely at our current structure and methods, conducting comparison studies of transportation departments across the U.S., engaging IDOT staff and stakeholders, and identifying opportunities to improve, in particular, our delivery of one of the largest DOT construction programs in the United States, Rebuild Illinois.

At IDOT, we look forward to implementation of these recommendations, knowing that a strong coalition is essential to fulfilling the immense responsibilities that we have been charged with. The past year has been a transformative period for the Department. IDOT staff have embraced the moment and their proactive leadership and the dedication of the BRC Commissioners enabled early implementation of many of the recommendations contained in this report.

In the coming months, IDOT will develop a strategic blueprint that will serve as a framework for implementation -- a roadmap that charts a clear course from these recommendations to a modernized IDOT that delivers the best possible transportation outcomes for the people of Illinois. To meet this ambition, it remains vital that the General Assembly, industry—including consultants and contractors—labor, advocates, and more, work together with us as partners in the effort.

Success will come through advancing as a unified cohort of leaders, innovators, and collaborators. Together, we are not just preparing for the future—we are shaping it.

I am grateful for all the efforts that have led to this moment and look forward to continuing our journey toward excellence—together.

Sincerely,

Gia Biagi

Blue-Ribbon Commission Chair &
Secretary of the Illinois Department of Transportation

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Executive Summary

Purpose of this Report

Over the past three years, the Blue-Ribbon Commission on Transportation Funding and Policy (the "BRC" or "Commission") has worked closely with the Illinois Department of Transportation (IDOT or Department) and transportation stakeholders with the altruistic intent of helping IDOT continue and enhance its critical role in maintaining a safe multi-modal transportation network and promoting the economic vitality of Illinois. Accordingly, the BRC submits this report to IDOT and the Illinois General Assembly (ILGA or General Assembly) with recommendations to help transform and modernize the Department in pursuit of this mission.

The Opportunity for Illinois

For much of its history, Illinois has served as the nation's crossroads, a sprawling hub of rivers, rails, and highways that powers the American and Illinois economy. As part of this vast multi-modal transportation network, IDOT supports the nation's third largest interstate system, second-largest rail system, and second-largest public transportation system. [1] Across Illinois—from Rockford to Cairo; Quincy to Effingham—IDOT's 5,000+ employees take pride in their work to ensure a safe and reliable transportation network. A recent IDOT staff survey revealed that 55% are highly satisfied with their work, with the top reason being a sense of purpose from meaningful public service. Long regarded as a leader in its field, IDOT pioneered methods in highway engineering and planning that became models for the nation.

However, by 2018, IDOT's legacy was being tested by a variety of internal and external constraints. After nearly a decade without a major State capital plan, Illinois infrastructure had earned a C- grade[2] and the state's infrastructure faced significant investment backlog. To address this lack of investment, Governor J.B. Pritzker and the ILGA passed the bipartisan Rebuild Illinois Capital Plan (Rebuild Illinois) in 2019, dedicating an initial $33.2 billion in new capital for transportation, all of which flows through IDOT.[3] Two years later, in 2021, the U.S. Congress passed the Infrastructure Investment and Jobs Act (IIJA) to address nationwide infrastructure investment gaps, directing an additional $17.8 billion in formula funding to Illinois,[4] of which IDOT was to receive $11.3 billion.[5]

Rebuild Illinois
+$33.2b
(2019)

IIJA
+$17.8b
(2022)

This unprecedented influx of capital funding challenged the Department and its partners in the engineering and construction community to deliver what is now the largest capital program in state history and one of the largest among other state departments of transportation. This coincided with workforce shortages and capacity constraints affecting the transportation sector nationwide. From 2015 to 2019, IDOT awarded approximately $2 billion annually for the completion of its capital program. Following Rebuild Illinois, IDOT was able to double its contract awards to approximately $4 billion from 2020 to 2025; however, IDOT must nearly double its awards again to accommodate the more than $8.4 billion programmed annually over the next six years. Meanwhile, the Department's overall headcount remained flat at around 5,000 people for over a decade.

When IDOT's workforce challenges were combined with process, procurement, data, and technology constraints, IDOT's capacity became further limited. By 2022, IDOT was struggling to spend its allocated funds and the State's transportation accounts grew to a cash balance of approximately $2.5

[1] IDOT Highway System Overview, IDOT Rail Overview, and IDOT Transit Overview
[2] ASCE Illinois Infrastructure Report Card (2018)
[3] Rebuild Illinois 2019
[4] IDOT Summary of IIJA Impact
[5] Memorandum on Illinois Sources of Transportation Funding

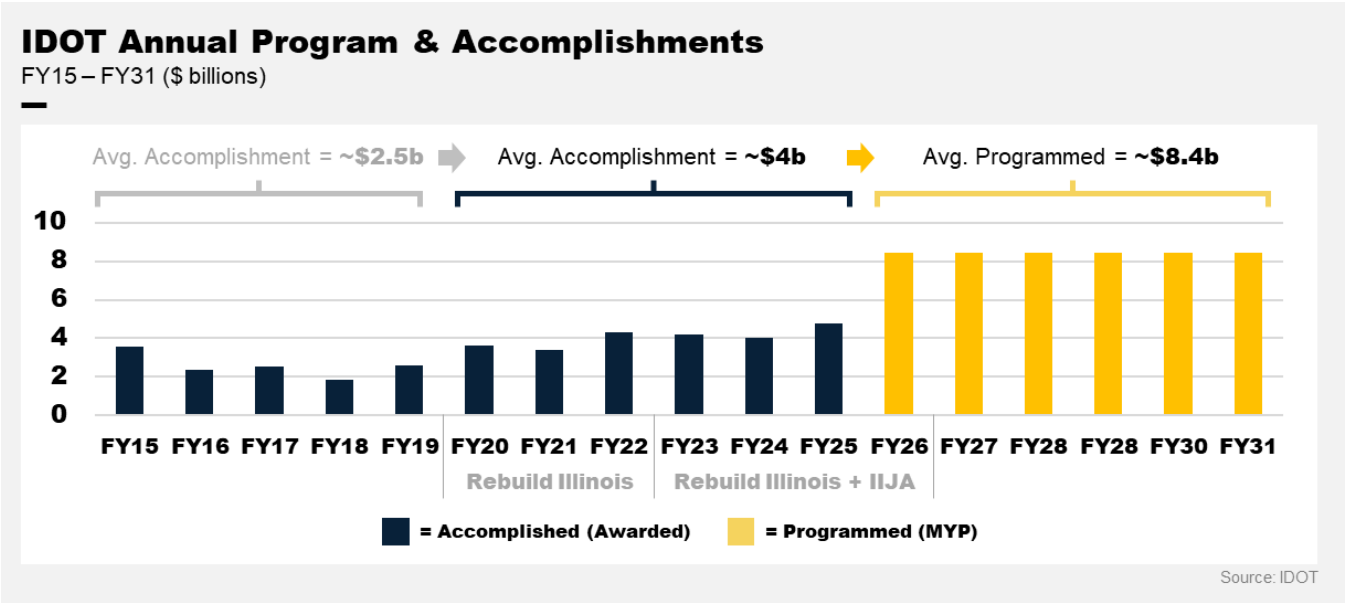
billion—most of which was allocated to projects held up in the delivery pipeline.[6] With the expected increase from IIJA starting in FY23, there was concern about the continued growth of the cash balance.

With the need to address these near-term capacity challenges, address long-term funding decline, and establish IDOT as a leading transportation department, the 104th General Assembly passed Senate Bill 0849 in 2022, establishing the BRC. The Commission was charged with 11 duties aimed at addressing the state's most critical transportation needs, from funding and project delivery to workforce development and sustainability. Over the past three years, the BRC has completed these duties. This included over 150 stakeholder interviews, extensive data analysis, and peer-state comparisons. This final report aims to provide actionable guidance for both IDOT and the legislature.[7]

The combination of historic funding and the work of the BRC presents a rare opportunity. This moment allows the IDOT and ILGA to address immediate project delivery needs while also establishing a foundation for long-term success with sustainable funding sources. The BRC has served as a catalyst, bringing together a broad coalition of stakeholders—from IDOT and the General Assembly to industry, local governments, and other partners—to coalesce around a unified vision for the future. To meet this vision, the BRC submits five overarching objectives that must be addressed by both IDOT and the General Assembly: (1) accelerate project delivery, (2) expand workforce capacity, (3) maximize the value of investments, (4) drive sustainable outcomes, and (5) secure adequate funding sources.

#1 Objective #1: Accelerate Project Delivery

IDOT is currently overseeing the largest capital program in its history, a $50.6 billion investment planned from FY 2026 through 2031, funded by Rebuild Illinois and the IIJA[8]. However, IDOT needs to scale its capacity to meet this ambitious goal. While IDOT successfully increased its annual program from approximately $2.5 billion to $4 billion after the passage of Rebuild Illinois, the Department must now increase its output to approximately $8.4 billion per year to deliver the current program.



[6] As of December 15, 2025, IDOT's cash balance is approximately $6.2b. Approximately $5.3b (~85%) of the cash balance is contractually obligated (Source: IDOT).
[7] While the BRC performed its duties, a separate effort to address the transit fiscal cliff culminated in the passing of SB 2111 on October 31, 2025. The BRC's analysis and recommendations remain independent of this effort; however, the anticipated impacts have been included in this report.
[8] IDOT FY2026-2023 MYP

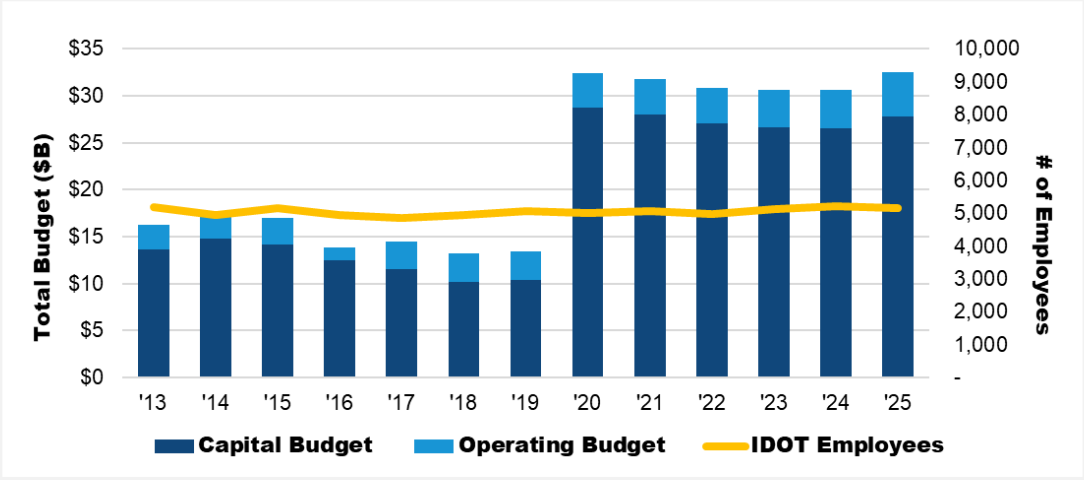
To accelerate project delivery, the BRC recommends a strategy that includes both modernizing IDOT internally and instituting targeted legislative reform. Internally, the Commission recommends standardizing project management procedures to create a consistent, "cradle-to-grave" approach, supported by a unified digital platform for real-time, data-driven oversight. A key recommendation is the creation of a dedicated central office to expertly manage large or complex projects, coupled with increased internal authority levels to empower staff and enhanced transparency with industry partners through semi-annual program lookaheads. In parallel, to address external delays, the Commission recommends that the General Assembly grant IDOT greater statutory authority for land acquisition, enable NEPA assignment to expedite environmental reviews, and create simplified permitting processes for routine waterway and rail work. Finally, the BRC strongly recommends strengthening options for innovative and alternative project delivery methods, such as Design-Build and Public-Private Partnerships (P3s), by removing restrictive statutory caps and project-by-project legislative approval requirements, allowing the Department to take advantage of these models that can accelerate schedules by overlapping design and construction phases and integrating responsibilities.

#2 Objective #2: Expand Workforce Capacity

IDOT utilizes a hybrid workforce model that pairs an internal team of approximately 5,000 employees with a vast network of external contractors and consultants. This workforce is the engine of IDOT's project delivery; however, while IDOT's capital program has more than doubled, the Department's internal staffing has remained relatively flat for over a decade.

IDOT Budget vs. Number of Employees

2013 – 2025



Sources: State of Illinois Budgets 2013-2025, AASHTO Salary Surveys 2021-2023, Illinois Auditor Reports 2013-2020, CMS 2024 Workforce Data Report

To address capacity constraints, the BRC recommends a multi-pronged approach. First, IDOT should pursue a strategic expansion of its headcount by 1,400 to 2,000 professionals, a move that requires the General Assembly to authorize funding while the Department simultaneously addresses its attraction, hiring, and retention challenges. In parallel, IDOT must foster capacity within the external workforce by improving partnerships, strategically leveraging consultants and contractors, and addressing equity challenges through the expansion of its small business certification and support services. Finally, to improve the productivity of the existing workforce, the BRC recommends exploring other capacity enablers such as process improvements, automation, and AI.

#3 Objective #3: Maximize the Value of Investments

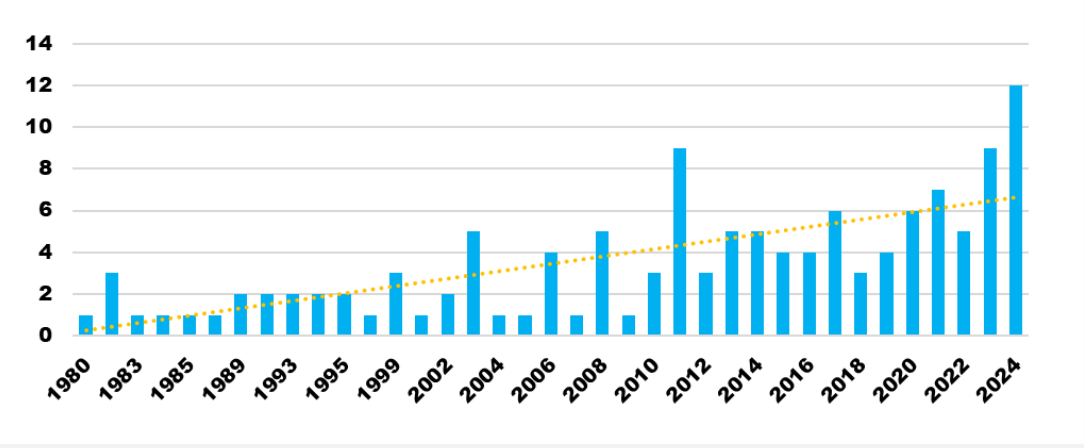
IDOT makes its investment decisions through a complex process that combines data-driven project scoring with legislatively directed funding. While effective for managing individual programs, this approach can result in investments being made within silos—separated by transportation mode, geography, and level of government—and without a comprehensive, statewide picture of total infrastructure needs. This fragmentation creates an opportunity to modernize Illinois's transportation investment strategy to ensure every dollar is aligned with State goals.

The BRC recommends a new approach that begins with establishing a comprehensive, data-driven foundation. This is achieved by having IDOT conduct a recurring, multi-modal needs assessment to create a transparent picture of Illinois's true infrastructure requirements. Building on that foundation, two complementary strategies are essential: first, implementing expanded funding flexibility to empower IDOT to direct resources to the highest-impact projects, regardless of mode or geography. Second, adopting a "fix-it-first" philosophy that prioritizes the maintenance and optimization of existing assets over costly new expansions, ensuring every dollar is invested as effectively as possible.

#4 Objective #4: Drive Sustainable Outcomes

IDOT currently addresses sustainability through a series of positive but often project-specific environmental initiatives, such as investing in EV charging infrastructure and exploring the use of recycled materials. The Illinois transportation sector accounts for approximately a third of the state's total greenhouse gas emissions, and concurrently, climate change is increasing the frequency of severe weather events, which have a direct impact on public safety and carry substantial economic costs. This new reality creates a critical need for Illinois to transition from individual measures to a comprehensive and unified sustainability program. Such a strategic framework will allow the state to proactively reduce its emissions while simultaneously protecting its infrastructure and most vulnerable communities from extreme weather.

Billion-Dollar Weather/Climate Events per Year in Illinois
1980 – 2024

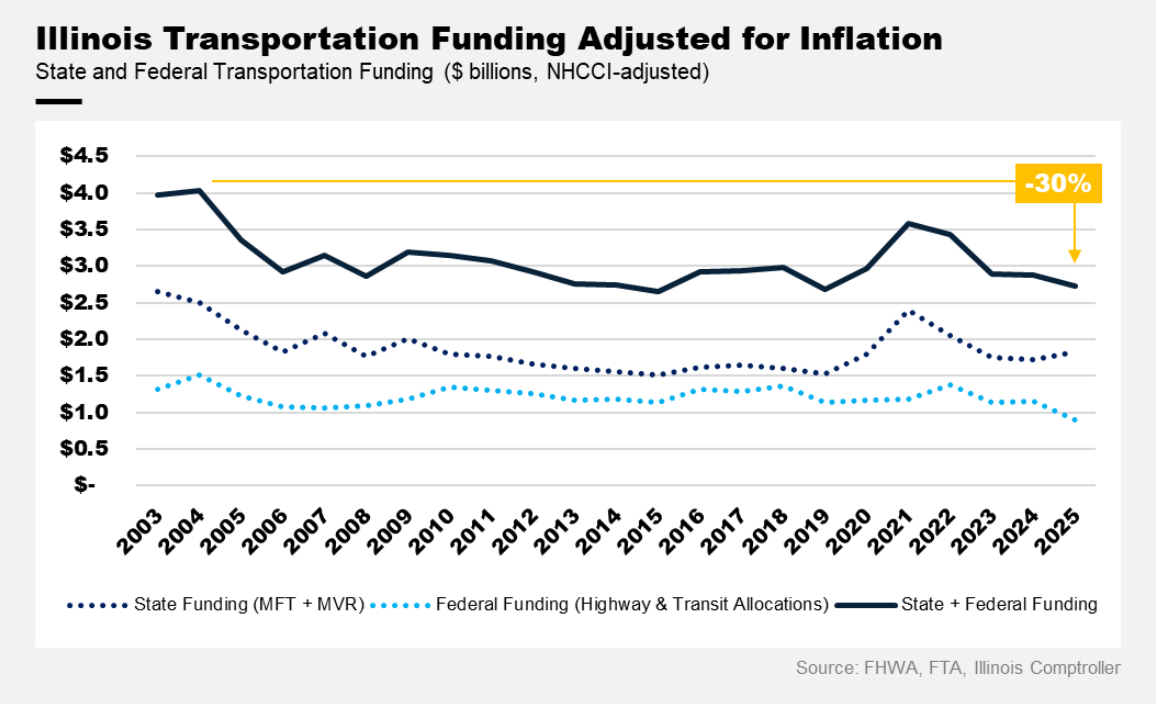


Source: NOAA (2025)

To realize this vision, the BRC recommends a three-part strategy. First, IDOT should implement the foundational components of a robust sustainability program by establishing a dedicated central office and setting clear, statewide goals for emissions reduction. This will enable IDOT to then implement a diverse portfolio of climate mitigation measures, such as incentivizing low-carbon materials and expanding support for public transit and active transportation. Finally, to prepare for the future, the BRC recommends a proactive approach to implementing climate adaptation measures, using recurring risk assessments to embed climate-ready design standards into all projects, thereby building a more resilient and durable transportation system for generations to come.

#5 Objective #5: Secure Adequate Funding Sources

The Illinois transportation system is funded by a complex combination of federal, state, and local revenues. IDOT is supported primarily by federal funds, the state Motor Fuel Tax (MFT), and Motor Vehicle Registration (MVR) fees. While recent funding from Rebuild Illinois and the IIJA has provided a vital infusion of resources, a gap between available revenue and current funding needs persists. In its most recent assessment, IDOT estimated an additional $2.3 billion is needed just to meet performance targets on the State-maintained highway system alone.[9] This assessment pre-dated changes due to recently passed transit funding legislation in the form of Senate Bill 2111 (SB 2111), which may increase the amount of unfunded investment needs by reducing the revenues available to IDOT. This challenge is further compounded by two long-term threats: construction cost inflation and the inevitable decline of the MFT. Although often viewed as a long-term issue, inflation is already diminishing the purchasing power of current funding; after adjusting for inflation, the value of Illinois's primary State transportation revenue sources remains more than 30 percent below its 2003 levels.



[9] 2022 IDOT TAMP

The BRC recommends that the General Assembly modernize Illinois's revenue sources by authorizing a diversified portfolio of mechanisms. This forward-looking strategy includes indexing MVR fees to keep pace with inflation, implementing fair heavy vehicle fees, and piloting a Road Usage Charge to adapt to the rise of electric vehicles. In conjunction with these new revenue streams, the BRC also recommends that the General Assembly prepare for a future capital bill and provide the necessary operational funding to support the modernization of IDOT through the implementation of these recommendations.

Next Steps

The BRC's report serves as a direct call to action, emphasizing that the fundamental transformation of how Illinois delivers transportation is a shared responsibility. While IDOT must take ownership of implementing many of the recommendations, its success hinges on a unified effort from all stakeholders, including the General Assembly, industry, advocacy groups, and other delivery partners.

Embracing this spirit of transformation, IDOT has already demonstrated a strong commitment by proactively initiating progress on 59% of the 27 recommendations, with highlights including improving the hiring process, developing new project management dashboards, and exploring the expansion of its Small Business Initiative. To ensure this momentum continues, IDOT has committed to creating a detailed implementation plan, translating the BRC's high-level recommendations into specific actions, timelines, and performance metrics. The Department will also provide annual progress updates to the General Assembly and the public, ensuring transparency and sustained accountability.

For the Illinois General Assembly, the immediate next step is to review the specific legislative considerations outlined in this report and partner with IDOT to advance the necessary statutory changes and budgetary support.

2

Background

BRC Duties

In 2022, the 104th Illinois General Assembly passed SB0849, establishing the Blue-Ribbon Commission on Transportation Infrastructure Funding and Policy to address 11 critical transportation needs in Illinois[10]. The BRC was tasked with the following duties:

1) **Evaluate current transportation funding in Illinois,** taking into account the viability of existing revenue sources and funding distributions

2) **Consider new and innovative funding options**

3) **Evaluate the existing governance of Illinois' transportation system,** including roles and responsibilities for the state and county, township, and municipal governments

4) **Evaluate current and future workforce needs** to design, construct, and manage the state's transportation system within the Illinois Department of Transportation and within the State as a whole

5) **Evaluate current and future data needs** of the Illinois Department of Transportation

6) Consider and recommend steps to **expedite project approval and completion**

7) **Consider future trends** that will impact the transportation system, including safety needs, racial equity, electric vehicles, and climate change

8) Consider ways to **improve transportation investment** impacts on goals such as improving racial equity, addressing climate change, and increasing economic growth

9) **Consider improvements to the performance-based programming system**

10) **Consider multimodal system needs,** including public transportation, bicycle facilities, railways, waterways, and airports

11) **Consider alternative solutions employed by other states**

The goal of the BRC was to develop recommendations that enable IDOT to more effectively deliver on its mission: to provide safe, cost-effective transportation for Illinois in ways that enhance quality of life, promote economic prosperity, and demonstrate respect for the environment. Upon the completion of these duties, the BRC was also tasked to deliver a report to the ILGA that detailed the BRC's activities, observations, and recommendations both for IDOT and the ILGA.

[10] Blue-Ribbon Commission on Transportation Infrastructure Funding and Policy

BRC Members

Per SB0849, BRC membership included: (1) Four members of the House of Representatives, with two appointed by the Speaker of the House of Representatives and two appointed by the Minority Leader of the House of Representatives; (2) four members of the Senate, with two appointed by the President of the Senate and two to be appointed by the Minority Leader of the Senate; (3) eight members appointed by the Governor with the advice and consent of the Senate; and (4) the chair of the Commission was appointed by the Governor from among his eight appointments. Members represented a diverse set of sectors, including the labor, engineering, construction, transit, active transportation, rail, air, and other sectors, and included participants of the Disadvantaged Business Enterprise program.

Figure 1: BRC Membership

Name	Appointed By	Title
Biagi, Gia[11]	Governor	Chair
Brown, Romayne	Governor	Member
Calderon, Laura	Governor	Member
Chin, Eileen	Governor	Member
Davidsmeyer, Rep. C.D.	Minority Leader of the House of Representatives	Member
DeWitte, Sen. Don	Minority Leader of the Senate	Member
Evans, Jr., Rep. Marcus	Speaker of the House of Representatives	Member
Fowler, Sen. Dale	Minority Leader of the Senate	Member
Grimshaw, Jacquelyne D.	Governor	Member
Kelly, Rep. Michael	Speaker of the House of Representatives	Member
Kotarac, Thomas	Governor	Member
Love, Duana	Governor	Member
Murphy, Sen. Laura	President of the Senate	Member
Poulos, Marc	Governor	Member
Spain, Ryan	Minority Leader of the House of Representatives	Member
Villivalam, Sen. Ram	President of the Senate	Member

[11] In January 2025, Secretary Gia Biagi assumed the role as BRC Chair from former IDOT Secretary Omer Osman

BRC Activities

The BRC began meeting on February 15, 2023. After a series of initial meetings, the Commission requested that IDOT engage an outside consultant to support the Commission's work. In January 2025, a consultant team led by KPMG LLP (KPMG) began its engagement. Over the next 12 months, the consultant team worked closely with the BRC, IDOT, and transportation stakeholders to support the completion of the 11 duties of the BRC.[12]

Establishment of Working Groups:

In early 2025, the team conducted an initial round of interviews with each BRC Commissioner, which led to the formation of six dedicated working groups. Each working group included three to four BRC Commissioners, representatives from IDOT, and consultant support. The focus of these working groups included:

- **Equity:** Examined how to provide equitable access to contracting opportunities and enhance supportive services for small and diverse firms.[13]
- **Funding:** Evaluated the long-term sustainability of current transportation funding sources, explored innovative new revenue mechanisms, and examined how funding is allocated through practices such as performance-based programming.
- **Governance:** Studied the roles, responsibilities, and decision-making structures that guide Illinois' transportation system to identify how collaboration and oversight between state, regional, and local agencies could be improved.
- **Project Delivery:** Addressed the end-to-end process of planning, designing, and constructing transportation projects to identify opportunities for improving efficiency, reducing delays, and ensuring on-time, on-budget completion.
- **Sustainability:** Identified strategies to build and maintain a transportation system that considers environmental impact, adapts to a changing climate, and supports the long-term economic and social well-being of communities.
- **Workforce:** Addressed IDOT's various workforce needs by examining strategies for increasing internal capacity, enhancing training and talent management, and building a robust talent pipeline for the broader transportation sector.

[12] KPMG's subcontractors included Acclaim Collier Engineering, BSquared, Inc., CDM Smith Inc., Marine Tiger Technologies, Metro Strategies, and Orion Engineering

[13] Other equity considerations, including community and workforce, were considered in other related working groups such as Funding and Workforce

Figure 2: BRC Commissioners' Working Group Assignments

Name	Governance	Workforce	Project Delivery	Funding	Equity	Sustain.
Biagi, Gia						
Brown, Romayne				●	●	
Calderon, Laura	●					●
Chin, Eileen			●		●	
Davidsmeyer, Rep. C.D.			●			
DeWitte, Sen. Don	●					
Evans, Jr., Rep. Marcus				●		
Fowler, Sen. Dale		●				
Grimshaw, Jacquelyne D.					●	●
Kelly, Rep. Michael		●				
Kotarac, Thomas	●			●		
Love, Duana		●				●
Murphy, Sen. Laura						●
Poulos, Marc		●	●			
Spain, Ryan				●		
Villivalam, Sen. Ram	●					

Across more than 20 meetings, each working group conducted a comprehensive review of IDOT's current operations and benchmarking against leading practices from peer states. This analysis allowed the working groups to identify observations and formulate proposed recommendations. Subsequently, working groups presented these observations and recommendations to the full Commission for further deliberation and final adoption.

Stakeholder Engagement:

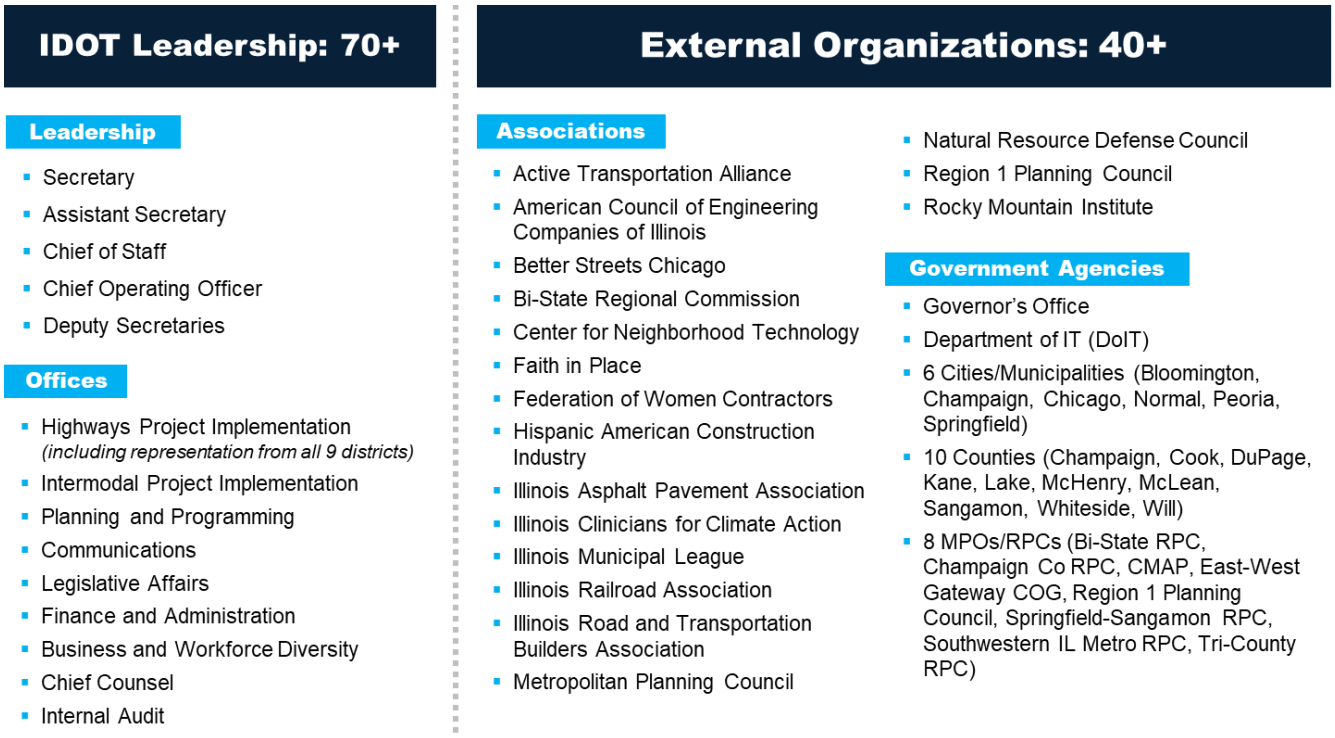
The BRC also initiated an extensive stakeholder engagement process to gather broad insights into the challenges and opportunities at IDOT. The feedback gathered was instrumental in shaping the Commission's observations and recommendations. This engagement included:

- 150+ stakeholders interviewed, including over 70 IDOT leaders and 40+ external organizations (advocacy groups; local, county, and State agencies; and metropolitan and regional planning organizations)
- Four external Project Delivery Working Group meetings, with representatives of the design, engineering, and construction industry as well as local governments, MPOs, and IDOT leadership
- Five IDOT internal Project Delivery Working Group meetings
- Ongoing engagement with IDOT Working Group leads
- One peer agency forum with representatives from DOTs in Colorado, Michigan, Tennessee, and Washington
- 1600+ responses from IDOT staff to an employee engagement survey[14]
- 19 public BRC meetings

[14] In Fall 2025, IDOT issued an employee engagement survey to all staff as a direct result of recommendations by the BRC and received over 1,600 responses from staff statewide

A sample of the IDOT roles and external organizations engaged by the BRC is provided below:

Figure 3: Stakeholder Engagement List



For additional information on public involvement in the BRC's activities, please see *Appendix 1: Public Involvement*.

Recommendations Adoption and Report Development:

Following the culmination of its analysis and deliberations, the BRC formally and unanimously adopted the comprehensive set of recommendations included in this report on October 21, 2025. In the subsequent two months, this report was finalized to create a complete record of the Commission's activities, observations, and recommendations for its official presentation to the ILGA.

Impact of Senate Bill 2111

For many years, and during the duration of the BRC's work, there has been a separate effort to address transit funding in Illinois. This included analysis by the respective transit agencies, the Regional Transportation Authority (RTA), Chicago Metropolitan Agency for Planning (CMAP), and others. The effort to address transit funding culminated in the passage of SB 2111 on October 31, 2025. SB 2111 seeks to restructure transit governance and create a more sustainable funding framework for public transportation across the state, with implications for the entire Illinois transportation network.

SB 2111 was signed by Governor Pritzker on December 16, 2025 and is set to be effective on June 1, 2026. It will alter the operational and financial landscape for IDOT and its partner agencies, creating both new responsibilities and funding reallocations that must be factored into future capital planning, programming, and project delivery.

The BRC's recommendations were formally adopted on October 21, 2025, ten days prior to the final passage of SB 2111, and were therefore developed independent of the final legislation. Given the potential impact of SB 2111 on IDOT's funding, governance, and operations, the Commission recognizes key provisions should be acknowledged in this report. Accordingly, relevant effects of the bill are summarized below and referenced throughout this report to provide context and ensure the BRC's recommendations are understood within the new framework that SB 2111 creates.

Key Provisions of SB 2111 Affecting IDOT:

SB 2111 represents a transformation of transportation policy in Illinois. While its primary aim is to address transit funding, certain provisions reshape the roles, responsibilities, and operational landscape for IDOT, affecting primarily four areas:

1. **Elevated Role in Transit Governance:** SB 2111 elevates IDOT's role in transit oversight and reform through:
    - **Interagency Coordinating Committee:** Establishes an Interagency Coordinating Committee on Transit Innovation, Integration, and Reform to advise the Department on improving transit outside the Northeast Illinois region.
    - **Transit Integration Policy Development Committee:** Creates a Transit Integration Policy Development Committee within IDOT, chaired by the Secretary, to better integrate transit policy with highway planning and design.
    - **Transit Coordination Oversight Officer:** Designates a new Transit Coordination Oversight Officer within IDOT to oversee the implementation of policies recommended by the Transit Integration Policy Development Committee.
    - **NITA Transition Coordination:** Mandates IDOT formally coordinate with the newly established Northern Illinois Transit Authority (NITA) as well as procure a consultant to support NITA's formation.

2 **New Planning and Programming Responsibilities:** SB 2111 creates new planning programming, and grant mandates for IDOT, including:

- **New Transit Grant Programs:** Requires IDOT to administer new transit capital investment programs, including the "Transit to Trails Grant Program."
- **New Funding for Intercity Rail:** Allows up to $342,000,000 from the Downstate Transit Improvement Fund to be used by IDOT for intercity rail capital projects.
- **Collaboration on Transit Infrastructure & Technology:** Directs IDOT to collaborate with the Illinois Tollway, counties, municipalities, and transit providers to implement Bus Rapid Transit (BRT) and bus priority services on expressways and tollways. This includes a mandate for IDOT to work with these partners to research, evaluate, and implement vehicle infrastructure and technology—such as intelligent transportation systems—to improve the safety and quality of public transportation on the roadway system.
- **Cross-Agency Coordination on GHG Goals:** Requires IDOT to work cooperatively with the Illinois Tollway, the Chicago Metropolitan Agency for Planning (CMAP), and other units of government to use investments in public transportation as a tool to help meet statewide goals for reducing greenhouse gas emissions.
- **Performance-Based Programming Considerations:** Requires IDOT to update its project selection criteria to evaluate the "project potential for mode shift away from single-occupancy vehicles and commercial motor vehicles."

3 **Revenue Reallocation:** SB 2111 redirects revenue streams from IDOT to transit, including:

- **Sales Tax on Motor Fuel:** Redirects 80% of the net revenue from the state sales tax on motor fuel to public transportation funds, beginning July 1, 2026. Of this amount, 85% will be deposited into the Public Transportation Fund (primarily for the NITA region) and 15% will be deposited into the Downstate Public Transportation Fund. The Regional Transportation Authority (RTA) estimates this amount to be $860m annually.[15]
- **Interest on Funds:** All investment income (i.e., interest) earned on the cash balances in the Road Fund and the State Construction Account Fund will be redirected to transit capital improvement funds. However, the bill contains conflicting language on the distribution, with one section specifying an 85/15 split and another indicating a 90/10 split between the Northern Illinois and Downstate funds. RTA estimates this amount to be $200m annually.[15]

Collectively, this redirected funding from IDOT's Road Fund, which is used by the Department for both operating and capital expenses.

[15] Source: RTA

4. **Broader Transportation Network Impacts:** SB 2111 also introduces several provisions that have an indirect impact on IDOT, including:

   - **Tollway Revenue for Capital Plan:** Directs the Illinois Tollway to increase tolls for passenger and commercial vehicles, effective January 1, 2027, "to fund the 2026 capital plan," signaling a major funding mechanism for capital investment by Illinois Tollway.
   - **Statewide Policy on Minimum Parking Requirements:** The bill enacts the "People Over Parking Act," which prohibits municipalities from enforcing minimum automobile parking requirements for developments near public transportation corridors and hubs statewide. While not a direct mandate for IDOT, this alters the land use and transportation planning environment in which IDOT operates.

Possible Impacts of SB 2111 on BRC Recommendations:

While the passage of SB 2111 helps advance some of the BRC's recommendations, the reallocation of funding from IDOT to transit affects BRC's workforce and revenue recommendations, including:

1. **Alignment with BRC Recommendations:** SB 2111 contains several provisions that directly align with the principles and recommendations put forth by the BRC, including:

   - **New Performance-Based Programming Metrics:** SB 2111 adds new requirements to evaluate a project's potential for "mode shift." This aligns with the BRC's recommendations under Objectives 3 and 4, which call for strengthening metrics-based investment goals and prioritizing projects that reduce vehicle miles traveled and support multimodal travel.
   - **Elevating IDOT's Role in Statewide Transit Governance:** SB 2111's expansion of IDOT's transit oversight and planning responsibilities is consistent with the BRC's recommendations under Objective 3 to reduce modal silos and improve integrated, statewide transportation governance.
   - **Framework for Local Agency Support:** SB 2111 requires IDOT to administer new grant programs and provide technical assistance to local entities, aligning with the BRC's recommendation for IDOT to expand its support services for local agency partners.
   - **Dedicated Funding for Non-Highway Modes:** By redirecting revenue streams to transit and rail, SB 2111 directly addresses the BRC's recommendation to create dedicated, recurring funding sources for non-highway modes, though at potential cost to IDOT's annual capital and operating budgets.
   - **Modernized Revenue Mechanisms:** SB 2111 directs the Illinois State Toll Highway Authority (Illinois Tollway) to implement an inflation-indexed toll increase, corresponding to the BRC's recommendation to modernize revenue streams by indexing fees to inflation.
   - **Cross-Agency Coordination for State Goals:** SB 2111 mandates greater collaboration between IDOT and other agencies to achieve statewide goals for emissions reduction and safety, consistent with the BRC's recommendations for performance-based programming and cross-agency collaboration.

- **Support for Transit-Oriented Land Use:** SB 2111's "People Over Parking Act" prohibits mandatory parking minimums near transit, supporting the BRC's recommendation to prioritize projects that encourage a "mode shift" away from single-occupancy vehicles.
- **Active Transportation and Multimodal Connectivity:** The bill creates the "Transit to Trails Grant Program" to connect public transportation with recreational trails, aligning with BRC recommendations to implement the Active Transportation Plan and promote multimodal connectivity.

2. **Increased Urgency for New Revenue Recommendations (BRC Objective 5):** The potential reduction in annual revenue for IDOT—which is estimated by the RTA to be approximately $1 billion—accelerates the need to implement the BRC's recommendations under Objective 5, which focus on using new and additional funding sources and advancing the next capital bill.

3. **Reduced Headcount Recommendation (BRC Objective 2):** The BRC initially recommended a headcount increase for IDOT of 1,400 to 2,000 full-time equivalents (FTEs). This recommendation was intended as a directional target, contingent upon ongoing monitoring of key variables such as funding availability, the project pipeline, and the capacity of the external workforce. SB 2111, however, necessitates a re-evaluation of this target. While the bill assigns new responsibilities to IDOT, it also corresponds with an approximate $1b annual decrease in IDOT funding according to RTA. This potentially represents a 12% reduction in the department's $8.4b annual capital program. Consequently, the BRC has adjusted its headcount recommendation by a proportional amount (12%) to approximately 1,200 to 1,700 FTEs over the next three to five years. Both IDOT and the ILGA should continuously evaluate this revised range, particularly as new revenue sources are explored to offset the reallocation of funds.

Recommended Next Steps:

At the time of this report's finalization, the full financial impact of SB 2111 on IDOT's capital program has not been determined. However, the anticipated reduction in available funds may have a cascading effect on both the scope of future capital projects and the Department's long-term staffing levels. Given this uncertainty, it is critical that both IDOT and the ILGA closely monitor the impacts of this new legislative framework.

Organization of This Report

This report is organized to present the Commission's observations, recommendations, and implementation considerations to support the continued modernization and transformation of IDOT and the state's transportation network. The structure is as follows:

Section 3: Observations details the 37 observations developed by the BRC, organized according to the 11 duties outlined in the Commission's mandate. For each duty, the report provides relevant background on current IDOT practices and leading methods, presents the Commission's specific observations, and summarizes recent progress made by IDOT and the ILGA.

Section 4: Recommendations presents the 27 specific, actionable proposals developed and adopted by the BRC. These recommendations are grouped under five overarching objectives and include both direct actions for IDOT to undertake and key considerations for the ILGA to address.

Section 5: Implementation Plan & Progress offers insight into the proposed strategy for executing the BRC's recommendations. It also provides a status update on the implementation progress already underway at the time of this report's publication.

Section 6: Concurring Views includes statements from individual BRC Commissioners who have provided their unique perspectives on the Commission's work and the path forward for transportation in Illinois.

3

Observations

BRC Duty #1:

Current Transportation Funding

Blue-Ribbon Commission Duty #1

Evaluate current transportation funding in Illinois, taking into account the viability of existing revenue sources and funding distributions

Background

As America's sixth largest state and home to the nation's third largest metropolitan area by population, Illinois contains one of the most extensive and valuable transportation systems in the country. The BRC recognizes that preserving and improving this network is essential as it enables residents to access education, jobs, and recreation while allowing businesses to grow. Achieving these objectives, while also balancing broad-based economic development with environmental priorities, requires sustained, long-term strategic investment sourced from a complex combination of federal, state, and local tax and fee revenues.

Federal Funding:

The US federal government provides funding to states through federal-aid programs for various transportation modes. The current authorizing law, IIJA, enacted in November 2021, provides over $551 billion to states from 2022 to 2026 through a combination of core formula programs and discretionary grants.[16] Under IIJA, Illinois is projected to receive more than $11 billion formula funding, with additional billions of dollars available through competitive discretionary grants across all modes.[17] This represents a 20% increase in average annual federal funding for Illinois compared to the preceding Fixing America's Surface Transportation (FAST) Act.[18] This funding is distributed to various agencies and levels of government within the State as discussed in BRC Duties #8 and #9.

State Funding:

State-level transportation funding consists primarily of MFT, motor fuel sales taxes, MVR fees, and tolling, with these revenues dedicated to transportation purposes by the State constitution's "lockbox" amendment.

- **Motor Fuel Tax:** The MFT is a per-gallon excise tax. The Rebuild Illinois law, enacted in 2019, doubled the excise tax rate and indexed future rates to inflation, as measured by the Consumer Price Index for All Urban Consumers (CPI-U). It now stands at 48.3 cents per gallon of gasoline and 55.8 cents per gallon of diesel.[19] MFT revenue is deposited into the Motor Fuel Tax Fund. After certain statutory diversions, such as administrative costs, the remaining funds are distributed. Approximately 48% is allocated to IDOT for State highway purposes, while the remaining 52% is distributed among municipalities, counties, and townships based on formulas that consider factors like population and road mileage.

- **Motor Fuel Sales Tax:** Unlike the MFT, the motor fuel sales tax is calculated as a percentage of the price of fuel, adjusted based on average fuel prices on a rolling six-month basis. As of

[16] H.R. 3684
[17] Durbin-Duckworth Summary of Illinois Wins in the IIJA
[18] IDOT Publication on IIJA
[19] Motor Fuel Tax Rates and Fees

July 1, 2025, rates ranged from 13 to 17 cents per gallon depending on the type of fuel.[20] Rebuild Illinois gradually dedicated up to 5 percent of the 6.25 percent motor fuel sales tax revenue to transportation. The majority of motor fuel sales tax revenue has been deposited into the State Construction Account Fund and the Road Fund. These funds are controlled by IDOT and are used primarily for the construction and maintenance of the State highway system. However, with the passage of SB 2111 in November 2025, these revenues will now be directed to transit authorities statewide.

- **Motor Vehicle Registration Fees:** MVR fees include a range of charges assessed on motor vehicles and motorists, including base passenger vehicle registration, driver licensing fees, and weight-based registration fees for trucks. Rebuild Illinois raised MVR fees (e.g., increased the base annual fee for light-duty passenger vehicles to $151[21]) and imposed a new annual surcharge of $100 on electric vehicles (EVs). [22]

- **Bonds and General Funds:** Beyond user fees, the State utilizes general funds and bond proceeds, particularly as directed by Rebuild Illinois, to support modes that lack dedicated State revenue streams. This is the primary mechanism for State funding of public transit, passenger rail, aviation, and port projects. For example, Rebuild Illinois appropriated funds for a "PAYGO" program for transit and rail, and created the Illinois Port Facilities Capital Investment Grant Program, which directs State funds to enhance marine transportation.[23]

- **Tolling:** In addition to state taxes and fees, Illinois contains over 300 centerline miles of toll roads and bridges, most of them operated by the Illinois Tollway. Toll revenue collected by Illinois Tollway or other tolling agencies is not allocated to IDOT or local governments. Toll operators like the Illinois Tollway self-finance their operations and capital needs.

Local Funding:

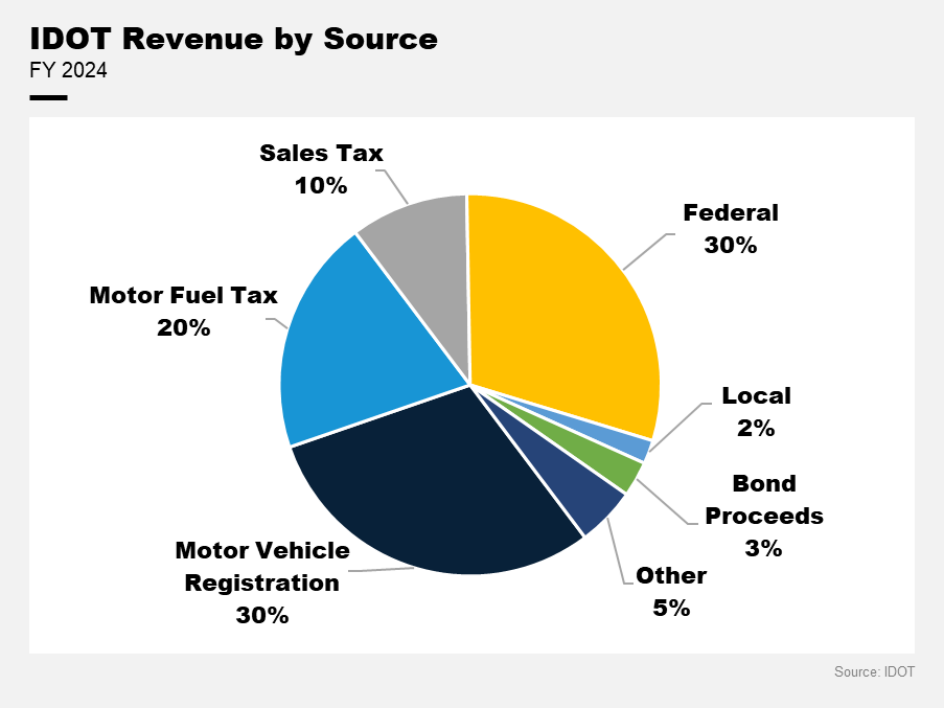
Local governments generate transportation revenue through a variety of means, including parking charges, transit fares, sales taxes dedicated to transit, real estate transfer taxes dedicated to transit, and, in some cities and counties, local-option MFT. Rebuild Illinois expanded the number of counties eligible to enact a local MFT and raised the maximum per-gallon rate they can impose. Many jurisdictions also contribute portions of their general budgets for transportation purposes.

Revenue generated at the local level is controlled and allocated by the collecting entity. For example, county-level sales taxes dedicated to transit can support county public transportation services. Similarly, many cities and counties collect a municipal wheel tax to support local street maintenance. These funds, combined with the pass-through funds received from the State (through MFT) and federal government, make up the total transportation budget for a local agency.

[20] Motor Fuel Sales Tax Rates
[21] Motor Vehicle Registration Fees
[22] Electric Vehicle Registration Fees
[23] Illinois Port Facilities Capital Investment Grant Program

IDOT Funding:

IDOT funds the construction, maintenance, and administration of the State's transportation system through a combination of federal, state, and local sources. The Department's primary source of revenue is MVR fees (30%), followed by federal funds (30%). When SB 2111 becomes effective in June 2026, IDOT will no longer receive revenue from sales taxes on motor fuels which represented approximately 10% of IDOT's budget in 2025.



BRC Observations

The Commission's analysis of Illinois's transportation funding reveals a system confronting structural challenges that threaten its long-term sustainability. Even with recent revenue increases from state and federal programs, the purchasing power of these funds is being systematically eroded by construction cost inflation, creating a growing multi-billion-dollar gap between available resources and the investment needed to maintain the system in a state of good repair. This issue is compounded by the projected long-term decline of the State's primary revenue sources—particularly the MFT—due to rising vehicle fuel efficiency and the adoption of electric vehicles. Finally, the inherent uncertainty of future federal funding, which is subject to the political volatility of congressional reauthorization, adds another layer of risk. The BRC concludes that these combined challenges, while not unique to Illinois, underscore an urgent need to examine and adopt new, more resilient approaches to funding transportation.

Observation #1 — Inflation is Creating a Growing Funding Gap

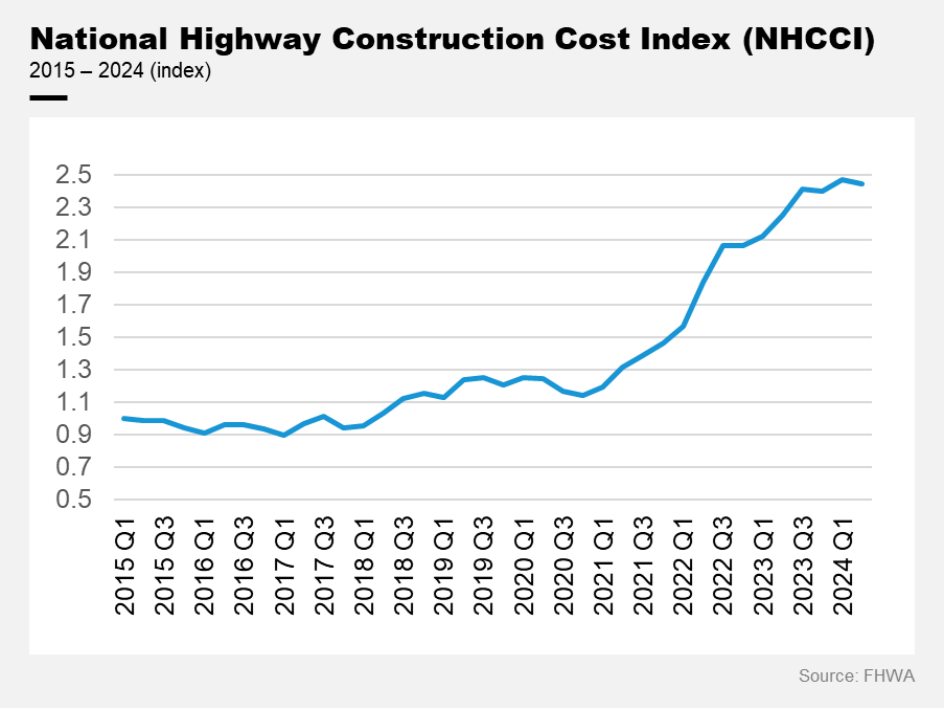
Even with recent revenue increases from programs like Rebuild Illinois and greater federal support from IIJA, a gap persists between available funding and the investment required to bring the state's transportation system into a state of good repair. This structural deficit is driven by two primary forces: (1) the rapid inflation of construction costs, which erodes the purchasing power of every dollar, and (2) steadily increasing system demands that outpace revenue growth.

In its 2022 Transportation Asset Management Plan (TAMP), IDOT identified a funding gap of at least $2.3 billion needed just to meet performance targets on the State-maintained highway system alone. This figure does not account for the additional investments required to exceed performance targets, nor does it address the extensive needs on roadways, transit networks, and other critical infrastructure managed by IDOT's local and regional partners. The result is a system carrying unfunded needs that are critical to daily operations and long-term investments essential for statewide mobility, safety, and economic competitiveness.

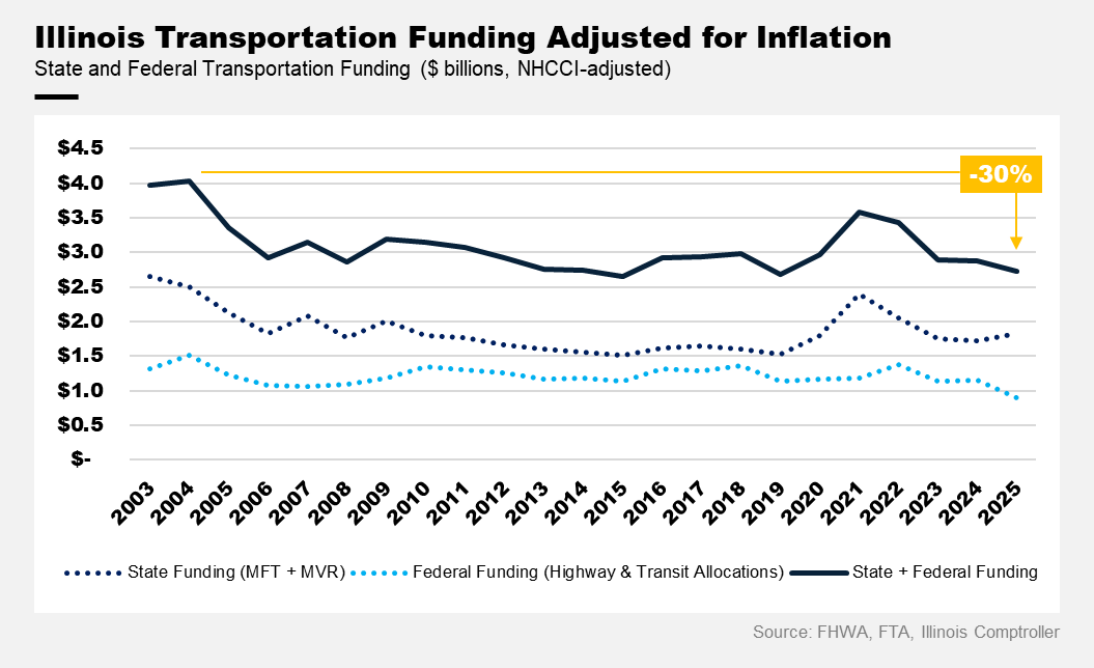
This deficit may widen with the passage of SB 2111 as the legislation redirects revenue from the state sales tax on motor fuel and interest income away from IDOT to support statewide transit operations. This reallocation represents an estimated annual revenue loss of approximately $1 billion for IDOT, per RTA, further compounding the challenge of addressing the state's infrastructure needs and accelerating the urgency for new, sustainable funding sources.

The purchasing power of existing revenues is being systematically eroded by the rapid inflation of construction costs. Despite increases in tax and fee rates under Rebuild Illinois and new federal contributions from IIJA, the real purchasing power of transportation dollars in Illinois remains flat. Between 2019 and 2022, construction cost inflation effectively erased the value of these new revenues.

This trend is not unique to Illinois. Nationally, construction costs have escalated dramatically, as evidenced by the Federal Highway Administration's National Highway Construction Cost Index (NHCCI), which surged by more than double between 2015and 2023. This increase was driven by sharp price hikes for essential materials like asphalt, steel, and concrete, alongside rising labor expenses. The spike was further intensified by a convergence of global supply chain disruptions, a nationwide shortage of skilled labor, and a surge in material demand created by the very infrastructure programs intended to fund these projects.



Rising construction costs nationally have had a direct impact on Illinois. After adjusting for construction cost inflation, the combined state and local MFT and MVR fee receipts remain more than 30 percent below their 2003 level, with little net change in purchasing power since 2006. While Illinois's move to index its MFT to general inflation provides a partial hedge, the State remains vulnerable in years where construction-specific inflation dramatically outpaces the general Consumer Price Index, further widening the gap between revenue and need.



Observation #2 — Traditional State Revenues Face Long-Term Decline

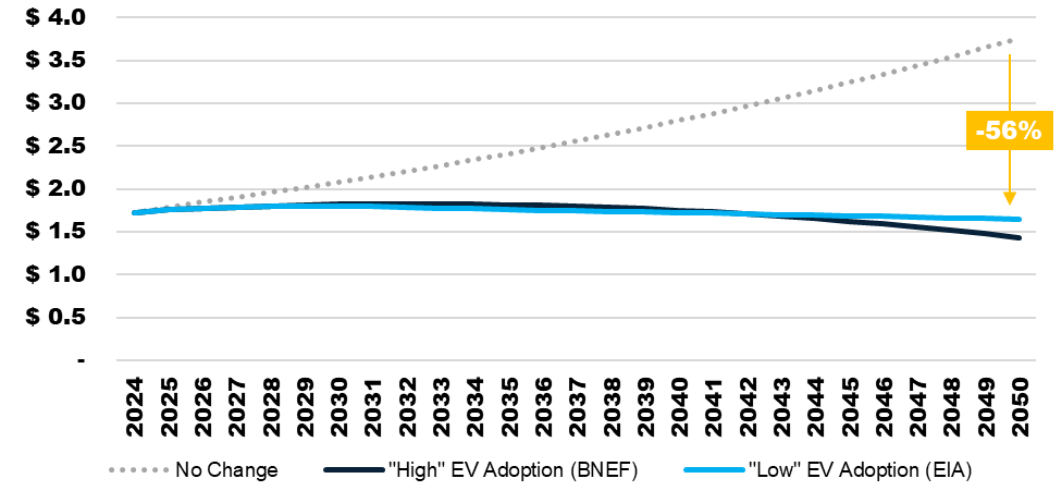
While Illinois has established several dedicated revenue streams for transportation, the long-term sustainability of this funding framework faces structural challenges. The foundational sources of State transportation revenue are under pressure from technological shifts, economic volatility, and inflation, threatening the State's ability to maintain and modernize its multimodal infrastructure in the decades to come.

Motor Fuel Tax:

While indexing the MFT to inflation has helped stabilize its purchasing power, the revenue source is being fundamentally eroded by increasing vehicle fuel efficiency and the growing adoption of EVs. These factors have already reduced taxable gallons per vehicle-mile traveled, a trend that is expected to accelerate as EV adoption increases in Illinois. National forecasts from sources like Bloomberg New Energy Finance (BNEF) and the U.S. Energy Information Administration (EIA), which can be considered as "high" and "low" adoption scenarios, illustrate the severity of this challenge. Under the high-adoption scenario, the combined state revenue from the MFT and existing EV fees is projected to decrease by over 56% by 2050, signaling a clear and urgent need for a more sustainable funding framework.

Revenue Impact of EV Adoption (U.S.)

Projected Impact of EV Adoption on US Gasoline Excise Tax and EV Fees ($ billions)



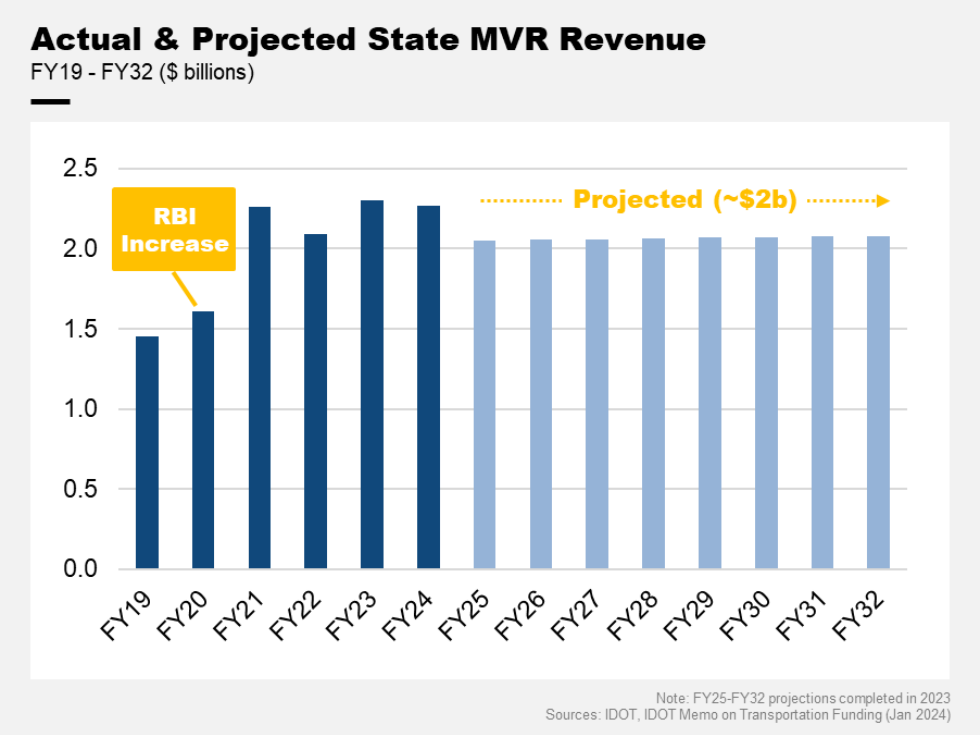
Sources: Bloomberg New Energy Finance, US EIA, Illinois Secretary of State, IDOT, CDM Smith Analysis

Motor Fuel Sales Tax:

Illinois also generates transportation funding from sales taxes on motor fuel. Like per-gallon MFT receipts, as fuel efficiency and EV adoption cause declining per-gallon consumption, potential revenues decline. Price-based sales-tax receipts shift with price levels, which can either offset declines in fuel volume purchases or exacerbate them, depending on the price of fuel. SB 2111 will redirect these funds from IDOT to support transit operations expenses statewide.

Motor Vehicle Registration Fees:

As MFT revenue faces a long-term structural decline, MVR fees have become the largest individual source of State transportation revenue supporting IDOT. While MVR fees are not subject to the same erosion from vehicle electrification, their current structure presents a long-term challenge. Because the MVR fees are set at a flat annual rate, their purchasing power is consistently diminished by inflation, creating a structural imbalance with the MFT, which is indexed. Furthermore, the flat $100 EV surcharge fails to keep pace, meaning that as MFT rates rise with inflation, the relative contribution from EV drivers shrinks each year, undermining the user-fee principle.



Observation #3 — The Future of Federal Funding is Uncertain

The current federal transportation authorization legislation, IIJA, expires in September 2026. As that date approaches, Congress must negotiate a new multi-year transportation authorization bill. Historically, the legislative process for renewing federal transportation bills has included the use of short-term extensions. These temporary measures create planning challenges for state DOTs, which rely on predictable, long-term funding streams to develop and execute multi-year capital projects. Concurrently, the federal Highway Trust Fund (HTF) faces a persistent gap between its revenues and expenditures. This has necessitated over $270 billion in transfers from the U.S. general fund since 2008 to ensure the HTF can meet its obligations.[24]

The nature of federal funding is also subject to the shifting priorities of executive administrations, particularly for discretionary grant programs. The selection criteria for competitive grants can change from one year to the next, with varying emphasis on rural versus urban projects, freight movement, or

[24] Peter G. Peterson Foundation

social equity. This makes it challenging for states to plan projects around these discretionary funds. Early indicators for the next reauthorization suggest a likely reduction in the number and funding levels for discretionary programs and a return to a focus on core formula programs for highways and transit. This inherent uncertainty requires states like Illinois to maintain a strong and resilient state-level funding base, as the size and focus of the federal partnership can change with every new administration and session of Congress.

Recent Progress

In recent years, the State of Illinois and IDOT have made tangible progress in addressing the long-term challenges facing transportation funding. Key actions have centered on successfully implementing the new revenue streams established by the Rebuild Illinois program and aggressively pursuing competitive federal grants to supplement traditional funding sources. These efforts represent a proactive approach to strengthening the State's financial foundation for infrastructure investment.

Implementation of New Revenue Measures of Rebuild Illinois:

To address the State's infrastructure funding shortfall, the bipartisan Rebuild Illinois capital plan of 2019 introduced new revenue measures for transportation. A cornerstone of the plan was the modernization of the MFT, which was doubled and indexed to inflation to protect its purchasing power from eroding over time. The program also increased MVR fees, established a new annual fee for electric vehicles to ensure all drivers contribute to road upkeep, and began dedicating a portion of the State's sales tax on motor fuel to transportation purposes. These measures were designed to create a more stable and sustainable funding base to support the bond-financed projects at the heart of the Rebuild Illinois program.

Securing Competitive Federal Discretionary Grants:

While formula-based federal funding provides a baseline, IDOT, along with partner agencies such as the Illinois Tollway, the Department of Commerce and Economic Opportunity (DCEO), Metra, and the Chicago Transit Authority (CTA), have made progress by successfully competing for and winning major federal discretionary grants. Since the passage of the IIJA, these agencies have secured several multi-million-dollar awards from programs like the federal BUILD (Better Utilizing Investments to Leverage Development) program. These competitive awards bring additional federal dollars into the State to fund critical freight, transit, and multimodal projects that are not possible with formula funds alone, demonstrating Illinois's capacity to maximize its share of available federal resources.

BRC Duty #2:

New and Innovative Funding Options

Blue-Ribbon Commission Duty #2

Consider new and innovative funding options

Background

As discussed in BRC Duty #1, Illinois faces a persistent gap between its transportation investment needs and the revenue generated by traditional funding sources. This challenge is not unique to Illinois; across the nation, funding mechanisms that were reliable for a century—primarily per-gallon fuel taxes and vehicle registration fees—are proving insufficient in the face of rising construction costs, growing system demands, and structural declines in motor fuel consumption. These pressures have motivated a nationwide exploration of new and innovative approaches to funding transportation infrastructure.

Illinois has already taken several important steps to modernize its transportation funding architecture, primarily through the Rebuild Illinois legislation. These changes include:

- Indexing MFT to inflation, a practice that helps protect the tax's purchasing power over time. Nearly half of all states now index their MFT rates to inflation or other economic indicators.
- Enacting an annual surcharge on EVs to ensure their owners contribute to road upkeep, a concept that has now been adopted by 41 states.
- Dedicating a portion of the state sales tax on motor fuel to transportation purposes.

Despite these recent innovations, the fundamental challenge of securing adequate and sustainable long-term funding persists. To close the remaining gap, Illinois will need to consider a more diversified portfolio of funding options.

BRC Observations

Illinois has a critical opportunity to build a more resilient and sustainable financial framework. The nationwide shift away from per-gallon fuel taxes has spurred innovation, creating a broad menu of proven funding mechanisms that other states are already implementing. The BRC believes that by strategically evaluating these options—including direct user fees like road usage charges, modernized vehicle registration fees, and various indirect fees—Illinois can learn from the experience of its peers.

Observation #4 **A Diversified Portfolio of New Funding Sources is Needed**

Over the past decade, states have experimented with and implemented a variety of new transportation funding mechanisms. The experience of these peer states provides a key takeaway: no single solution is a silver bullet. Instead, successful states are building a diversified portfolio of revenue sources to create a more resilient and sustainable funding architecture.

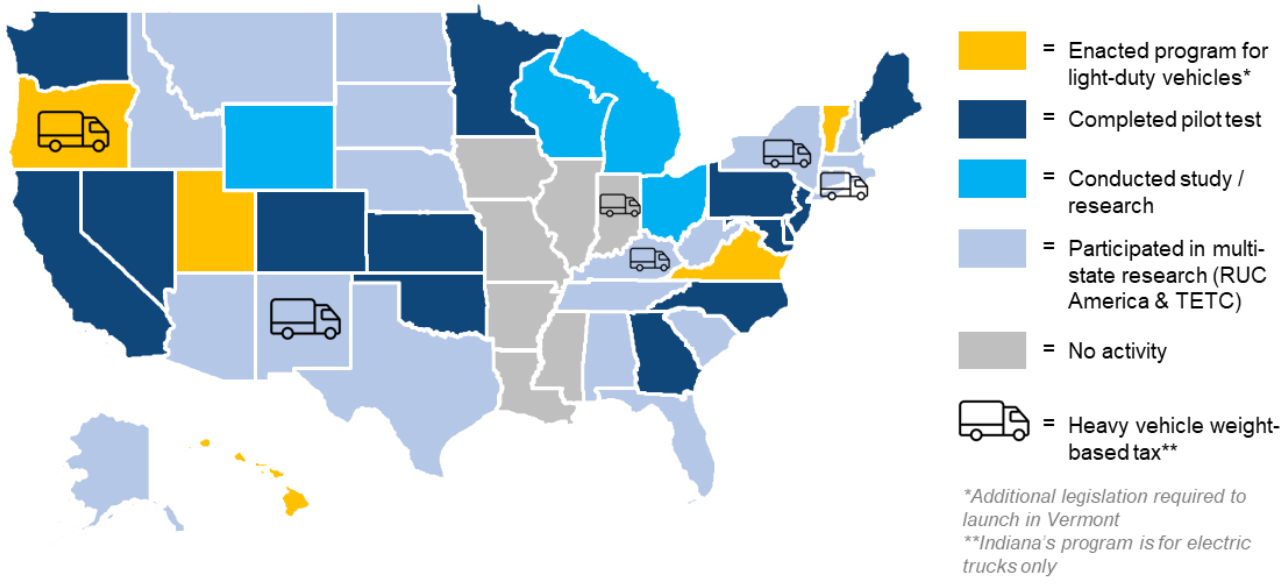
Direct User Fees:

Much of the industry's attention has revolved around finding a replacement for the MFT, which has long been the largest single source of transportation funding. MFT's structural decline has motivated this search, with most efforts focused on replacements that maintain the "user-pays" principle, linking how much a vehicle owner uses the system with how much they contribute.

- **Road Usage Charging (RUC):** RUC is a per-mile fee seen as a direct replacement for the gas tax. Forty-three states have studied, piloted, or enacted a road usage charge, a pay-per-mile fee for light-duty vehicles seen as a replacement for gas taxes. Illinois has yet to examine this mechanism. In the four states with active voluntary RUC programs (Oregon, Utah, Virginia, and Hawaii), RUC also serves as a replacement for EV and hybrid registration surcharges. Oregon's program becomes mandatory for EVs and hybrids in 2027 and 2028, while Hawaii's program becomes mandatory for EVs in 2028 with plans under development to extend the charge to all light-duty vehicles by 2033. RUC programs display a range of approaches for vehicle enrollment, phasing (EVs, PHEVs, hybrids, highly fuel-efficient vehicles, all light-duty vehicles), rate setting, and collection methods (e.g., user-uploaded odometer photos, odometer readings, and in-vehicle telematics).

- **Heavy-Duty Vehicle Fees:** Illinois currently addresses the impact of heavy trucks through a combination of a higher MFT rate on diesel (compared to gasoline) and weight-graduated truck registration fees. Illinois also requires permits for oversize/overweight vehicles, but these permits do not reflect costs. Collectively, these charges function as indirect proxies for road usage and impact. In the middle of the last century, over 20 states imposed weight-distance or ton-mile taxes on truck usage, but these programs gradually faded in favor of diesel taxes. Four states held on to their weight-distance tax programs that more directly connect usage and impact to revenues: Oregon, New Mexico, Kentucky, and New York. Connecticut enacted in 2021 and launched in 2023 a weight-distance tax called a "highway use fee," and more recently Indiana enacted a weight-distance tax on heavy electric trucks.

Figure 4: RUC and Weight-Distance Taxes Across the US[25]



[25] Source: CDM Smith

- **Tolling:** Illinois already has a robust system of tolled roadways, primarily operated by the Illinois Tollway. Both State and local agencies have leveraged tolling as a strategy to fund new capital construction and ongoing maintenance for roadway infrastructure, including recent projects such as the IL 390 tolled corridor (which included the expansion and conversion of a previously untolled expressway) and the Houbolt Road Bridge in Will County (constructed through a P3). Illinois Tollway reconstructed the former Elgin O'Hare Expressway and converted it to a tolled corridor as part of the Elgin O'Hare Western Access (IL 390/I-490) program.

Indirect User Fees:

An indirect user fee is a charge applied to activities that create demand on the transportation system rather than directly to road use. These fees typically target services or transactions that rely on infrastructure, such as ride-sharing trips or retail deliveries, and are collected through platforms or retailers instead of at the point of travel. MFT is a form of indirect user fee. By linking revenue to behaviors that contribute to usage, congestion, and system wear, indirect user fees can broaden the funding base.

- **Transportation Network Company (TNC) Fees:** Illinois regulates TNCs statewide through the Transportation Network Providers Act but does not have a statewide TNC fee; Chicago, Skokie, and Evanston apply local ground-transportation and congestion surcharges to fund transit and address congestion. Nationally, over a dozen states impose statewide TNC fees using flat per-trip rates (with rates indexed to inflation in one state) or percentage-of-fare assessments. The seven states with flat-rate fees range from $0.10 to $0.75 per trip. The logic behind these fees is to capture revenue from the growing use of ride-hailing platforms.

- **Retail Delivery Fees:** A retail delivery fee reflects the impact of e-commerce and home deliveries on roadway usage. Minnesota and Colorado are the first two states to enact retail delivery fees. Minnesota's applies a 50-cent fee per qualifying transaction over $100, with broad exemptions for food, medical products, and small sellers.[26] Colorado applies a per-delivery fee indexed annually, currently at 28 cents per transaction, filed with sales tax returns, and exempts retailers below a sales threshold.[27] Both states provide examples of how retail delivery fees can be administered efficiently, support transportation infrastructure, and adapt to local policy goals.

- **EV Energy Taxes:** Another emerging mechanism is a tax on electricity sold at public EV charging stations, enacted in various forms in ten states. This fee, often a per-kilowatt-hour excise tax, is intended to mirror the MFT by linking payment to "refueling." However, this approach faces limitations. Because most EV charging occurs at home, a tax on public charging captures only a small fraction of miles driven. Furthermore, it presents administrative complexities and could disincentivize EV adoption, potentially conflicting with broader environmental goals.

- **Other Indirect Fees:** States are also exploring a range of other indirect fees to capture revenue from transportation-related activities. These include tire taxes, which link a fee to a product that directly correlates with vehicle miles traveled and road wear, and dedicating a portion of sales tax revenue from automobile parts and services to transportation funds.

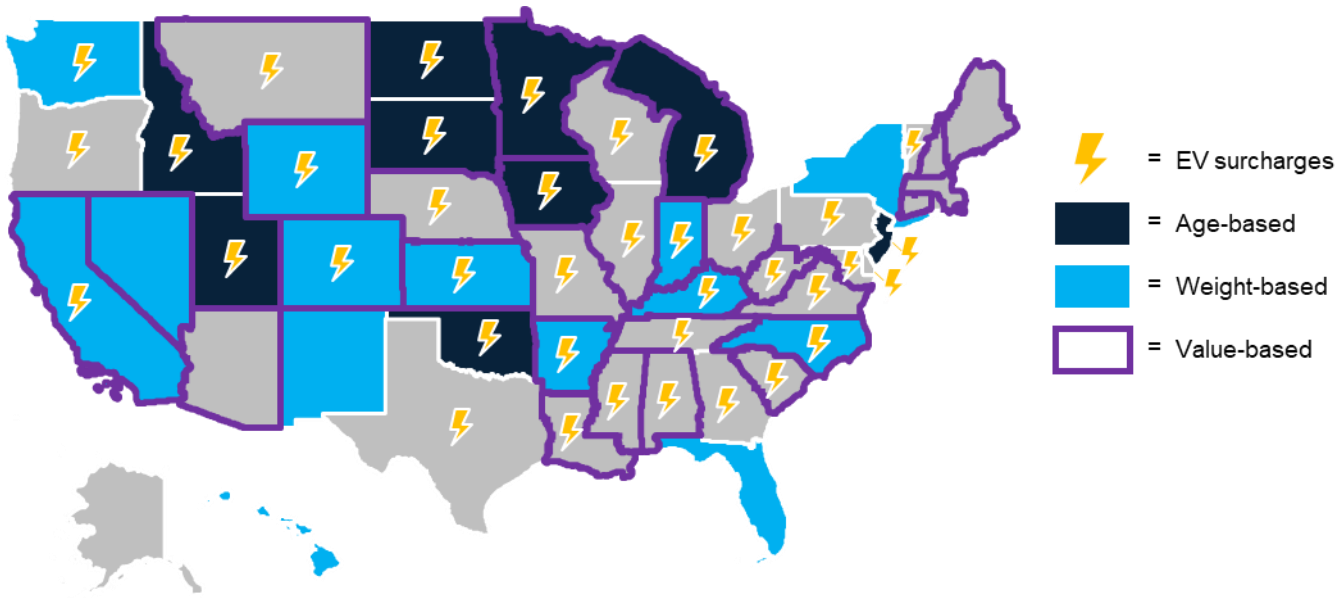
[26] Minnesota Department of Revenue
[27] Colorado Department of Revenue

MVR Fees

MVR fees currently represent the largest single revenue source for statewide transportation in Illinois. While the fee structure graduates by vehicle weight and class to reflect the greater roadway impact of heavier vehicles, the rates themselves are not indexed to inflation. Since their last increase in 2019, the purchasing power of this critical revenue stream has steadily eroded. Similarly, the annual surcharge for electric vehicles—initially set to approximate the MFT paid by a typical gasoline vehicle—also remains a flat, unindexed fee. Unlike the MFT, which adjusts for inflation, this static structure creates a growing gap in contributions between different vehicle types.

Some states automatically index MVR fees to inflation to maintain purchasing power such as Pennsylvania[28] and North Carolina[29]. At least 30 states incorporate one or more vehicle characteristics (age, value, weight) into MVR fee calculations. For example, Minnesota, New Jersey, and Utah all incorporate age-based factors into MVR fee rates, and Florida, Hawaii, Iowa, Kansas, and Washington all have weight-based fees as a component of light-duty MVR fees. California, Minnesota, and Alabama include vehicle value as a basis for MVR fees. Widespread use of EV surcharges exist nationally which are often intended to approximate foregone MFT.

Figure 5: MVR Fees for Light-Duty Vehicles Across the US[30]



Indexing MVR fees, including the EV surcharge, to inflation preserves their purchasing power and replaces large, politically difficult rate hikes with predictable, incremental annual adjustments. Beyond indexing, the fee structure could be further modernized to advance other policy goals. Incorporating elements like vehicle age or value can address equity by reflecting a vehicle owner's ability to pay. Similarly, tying fees to attributes like weight or even hood height can better account for a vehicle's impact on pavement wear and safety risks to vulnerable road users. This approach also allows for tiering the EV surcharge by vehicle class, creating a more equitable system that better aligns with roadway impacts and maintains parity with the indexed MFT.

[28] Pennsylvania CPI Fee Adjustments
[29] North Carolina Department of Transportation
[30] Source: CDM Smith Analysis

Carbon Pricing

Carbon pricing offers a funding stream aligned with environmental policy priorities by targeting transportation emissions. Illinois does not currently employ a carbon pricing instrument for transportation funding. Two states, California and Washington, operate cap-and-trade programs that generate revenue, much of it available for transportation purposes. Meanwhile, the Regional Greenhouse Gas Initiative (RGGI) imposes a more limited cap-and-trade policy across 11 states in the Northeast, with funding not necessarily dedicated to transportation purposes.

California's Cap-and-Trade Program is administered by the California Air Resources Board (CARB). The fee covers about 80–85% of the state's greenhouse gas emissions, including the transportation sector.[31] Under this system, CARB sets a statewide, annually declining cap on total greenhouse gas emissions. Each year, CARB issues a limited number of emissions allowances, either auctioned or allocated for free to certain sectors.[32] Since 2015, transportation fuel suppliers (such as gasoline and diesel distributors) have been required to purchase allowances for the carbon content of the fuels they sell in California, effectively embedding the carbon price into the wholesale cost of transportation fuels.[33]

Observation #5 — Consistent Criteria Should Inform Prioritization of Funding Options

The number of new and innovative funding options being explored by states necessitates a strategic framework for prioritizing which mechanisms are best suited for Illinois. Effective prioritization requires evaluating each potential mechanism against a consistent set of criteria that extend beyond mere revenue generation to ensure alignment with the BRC's core funding objectives. By applying these principles, Illinois can strategically select and combine options to build a funding structure that is resilient, equitable, and capable of meeting the state's future transportation needs. Example principles, based on leading practices, may include:

- **Adequacy:** Revenue mechanisms must be sustainable and generate sufficient funding to meet the full range of transportation needs, remaining resilient to inflation and changing travel patterns to prevent a growing backlog of deferred maintenance.
- **User Equity:** The funding framework should ensure that all who use and impose costs on the transportation system—including heavy vehicles, commercial delivery fleets, and transportation network companies—contribute proportionally to its upkeep.
- **Alignment with Co-Benefits:** Funding mechanisms should be designed to advance broader State priorities alongside revenue generation, such as reducing congestion, improving safety, promoting social equity, and achieving climate goals.
- **Public Understanding:** Revenue policies must be transparent, easy to understand, and straightforward for the public to comply with, supported by clear communication on how funds are collected and reinvested into the system.
- **Administrative Efficiency:** Collection and enforcement systems should be designed to be as efficient as possible, minimizing administrative costs and complexity to maximize the net revenue available for infrastructure investment.

[31] California Air Resources Board, Cap-and-Trade Program
[32] California Air Resources Board, Cap-and-Trade Program, About
[33] Center for Climate and Energy Solutions

Recent Progress

The ILGA's enactment of MFT indexing and a new surcharge for electric vehicles in 2019 represented a first step in modernizing Illinois's transportation funding policy. While the ILGA has since directed IDOT to study the long-term impacts of EV adoption, it has not yet authorized the exploration of specific new revenue mechanisms. In the interim, individual legislators have introduced various bills containing innovative funding concepts, ranging from RUC pilots to fees on retail deliveries and transportation network companies. However, these efforts have not been part of a coordinated, statewide strategy.

BRC Duty #3:

Governance of Illinois' Transportation System

Blue-Ribbon Commission Duty #3

Evaluate the existing governance of Illinois' transportation system, including roles and responsibilities for the state and county, township, and municipal governments

Background

Transportation infrastructure in Illinois is delivered and managed through a complex, multi-layered governance structure involving federal, state, and local agencies. Each level has distinct yet interwoven responsibilities for planning, funding, regulation, and project delivery across all modes of transportation.

Federal Governance:

The federal government acts as a funding partner and regulator for Illinois transportation through the U.S. Department of Transportation (USDOT). This federal role directly impacts Illinois by providing financial resources for projects across all modes—including highways, bridges, public transit, rail, airports, and ports—via legislation like IIJA, while simultaneously requiring adherence to strict national standards. Key USDOT agencies, such as the Federal Highway Administration (FHWA), Federal Transit Administration (FTA), Federal Railroad Administration (FRA), and Federal Aviation Administration (FAA), work directly with IDOT to ensure that all federally funded projects comply with uniform requirements for safety, design, and environmental protection, making federal policy a foundational element of nearly every major transportation initiative undertaken in the State.

State Governance:

At the state level, transportation governance is established by the ILGA and implemented by executive agencies, principally IDOT. The ILGA holds the ultimate authority to create transportation-related laws, establish funding mechanisms, and authorize revenue sources. As the primary executive agency, IDOT is responsible for translating this legislative direction into action. It plans, constructs, and maintains the State's highway system and administers both federal and state funds for all modes of transportation, including public transit, passenger and freight rail, high-speed rail initiatives, airports, waterways, and bicycle and pedestrian facilities. IDOT's responsibilities across modes include:

- **Highways:** IDOT is responsible for the planning, design, construction, operation, and maintenance of the State's 15,886-mile highway system, which forms the backbone of Illinois's road network.
- **Public Transit:** IDOT provides essential financial and technical support to the State's diverse public transit systems, particularly for downstate urban and rural providers. The governance and funding landscape for transit is undergoing a transformation with the passage of SB 2111. This legislation creates a new, dedicated funding stream for transit statewide but also overhauls the oversight structure in northeastern Illinois. SB 2111 dissolves the RTA and replaces it with a new, consolidated entity: the Northeastern Illinois Transit Authority (NITA).

While IDOT continues its role as a primary state and federal partner for downstate systems, its relationship with transit in northeastern Illinois will evolve as IDOT is tasked with coordinating directly with the new, integrated NITA, primarily acting as a pass-through for federal funds and a partner on major capital projects, rather than engaging with multiple separate service boards. This new structure, combined with a more reliable State funding source, reshapes regional transit governance and alters the financial and operational relationship between the State and its largest transit partners.

- **Rail:** IDOT's Bureau of Railroads oversees both passenger and freight rail policy. For passenger service, IDOT provides operating and capital funding for the State-supported Amtrak routes that connect Chicago to downstate cities. For freight, IDOT acts as a key coordinating partner, most notably in the Chicago Region Environmental and Transportation Efficiency (CREATE) Program, a public-private partnership aimed at improving the efficiency of the nation's busiest rail hub.

- **High-Speed Rail:** IDOT is the lead agency for developing higher-speed passenger rail in Illinois.

- **Airports:** IDOT's Division of Aeronautics is the State's primary aviation authority. It does not operate major commercial airports but is responsible for administering federal (i.e., FAA) and State capital grants for airport improvements, licensing public airports, developing the State's aviation system plan, and providing technical assistance to local airport operators.

- **Ports and Waterways:** IDOT's role in maritime transportation is primarily in planning and financial support. The department developed the Illinois Marine Transportation System Plan to guide investment and policy and administers capital funding programs that support local port districts in their efforts to modernize facilities and improve freight movement.

- **Bicycle and Pedestrian:** IDOT is responsible for developing a statewide bike plan and establishing design standards for bicycle and pedestrian facilities, particularly when they are on or intersect with the State highway system. The department also administers key funding sources for local projects, such as the Illinois Transportation Enhancement Program (ITEP), which is a primary source of federal funds for community-based bike paths, trails, and sidewalks.

Operating as a distinct and parallel entity is the Illinois Tollway, an administrative agency of the State responsible for the construction, operation, and maintenance of the 294-mile Illinois Tollway system, a network primarily serving northern Illinois. Illinois Tollway is a user-funded system with its budget for maintenance and operations derived from tolls paid by its users, not from the state or federal tax dollars that support IDOT's programs. This financial independence creates a separate governance and funding stream for a large portion of the region's highway infrastructure.

Beyond these primary transportation bodies, a host of other State agencies provide essential support and oversight that directly impact project delivery and system management. The Illinois Commerce Commission (ICC) regulates safety at highway-rail grade crossings and oversees utility relocations, while the Illinois Environmental Protection Agency (IEPA) and Department of Natural Resources (IDNR)—including the Illinois State Historic Preservation Office (SHPO)—conduct critical environmental and cultural preservation reviews. The Attorney General's office provides legal counsel and handles eminent domain proceedings for right-of-way acquisition. The Governor's Office of Management and Budget (GOMB) manages the bond sales that finance capital projects, and the Secretary of State

administers vehicle registrations. Administrative agencies like the Department of Innovation & Technology (DoIT) and Central Management Services (CMS) provide the necessary IT and procurement backbone for IDOT's operations. Finally, the Illinois State Police ensure safety on the roads, and the Auditor General provides financial and performance oversight of all State agencies, including IDOT.

Local Governance:

The State of Illinois contains 6,930 units of local government, the most in the nation. At the forefront of regional coordination are the state's 15 Metropolitan Planning Organizations (MPOs) and numerous non-metropolitan Regional Planning Organizations (RPOs). These federally mandated bodies are not infrastructure owners but are critical planning forums where local officials collaborate to set regional priorities for all modes, including highways, public transit, freight movement, and bicycle and pedestrian networks. They are responsible for developing long-range transportation plans and short-range Transportation Improvement Programs (TIPs), which are essential for securing and programming federal funds for local projects.

The direct ownership and maintenance of most Illinois's surface transportation network falls to its numerous general-purpose local governments. Illinois has 102 counties, 1,300 municipalities, and 1,426 townships, and these entities are responsible for county highways, city streets, and a vast 72,000-mile network of rural and unincorporated roads. This responsibility extends to the active transportation network, as these same municipalities, counties, and townships build and maintain most of the sidewalks, crosswalks, and local bike lanes on their road systems. In addition, local Park Districts are major developers of multi-use recreational trails, which often form key parts of a community's active transportation network.

Public transportation and other specialized modes are typically managed by dedicated local or regional agencies. In northeastern Illinois, the governance structure will be transformed with the execution of SB 2111, which dissolves the RTA and its three service boards—the CTA, Metra, and Pace. These have been replaced by a new, consolidated entity, the NITA, which now oversees all transit planning, operations, and capital investment for the six-county region. Outside of this new structure, downstate urbanized areas continue to be served by their own independent public transit districts, while rural transit providers offer essential demand-response services. Similarly, most of Illinois's airports are owned and operated at the local level, ranging from the Chicago Department of Aviation, which manages O'Hare and Midway International Airports, to the dozens of local Airport Authorities that operate smaller commercial and general aviation airports across the State.

Beyond these structures, Illinois utilizes the most special-purpose districts of any state, with 3,227 such entities identified by the U.S. Census Bureau. For transportation, this includes local Port Districts, which are the primary drivers of maritime commerce, owning and operating terminal facilities on the state's navigable waterways. Illinois law also allows for the creation of other bodies, such as Transportation Development Districts (TDDs), which can be formed to levy taxes and fund specific local infrastructure improvements.

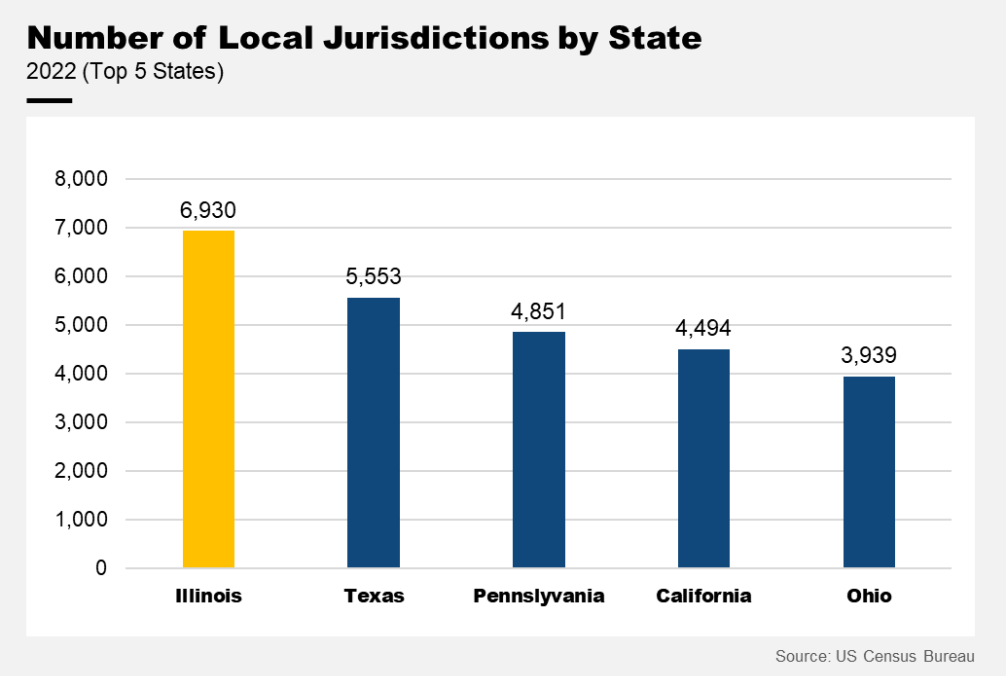
BRC Observations

The Commission's analysis of Illinois' transportation governance reveals a system defined by a decentralized structure that empowers communities to be responsive to local needs but also creates systemic challenges. The sheer number of local government units, combined with a highly centralized State approval process, results in coordination challenges, project delays, and inequities in the ability of local agencies to deliver projects.

Observation #6 | **Illinois' Decentralized Governance Model Empowers Local Communities but Creates Coordination Challenges**

Illinois' transportation governance is defined by a high degree of decentralization, a structure rooted in two key factors: the number of local government units and the jurisdictional authority they possess.

With 6,930 distinct units of local government, Illinois has more than any other state in the nation. This dense network includes 102 counties, 1,295 municipalities, and 1,425 townships, all of which can hold some responsibility for transportation infrastructure. This sheer volume of jurisdictions creates a complex and often overlapping web of authorities that complicates statewide planning and project delivery.



This decentralization is further amplified by the State's delegation of road jurisdiction and its strong "home rule" provisions. Of the state's 145,000+ road miles, IDOT has jurisdiction over only about 11%, meaning most of the system is locally owned and operated. Furthermore, the Illinois constitution grants home rule units broad powers to manage their own affairs, including implementing novel local solutions like creating a new fee for road repairs without first seeking permission from the ILGA.

Figure 6: Comparison of State-Owned Road and Lane Miles (Sample)[34]

State	Road Miles (State-Owned %)	Lane Miles (State-Owned %)	Daily Vehicle Miles Traveled (State-Owned %)
Texas	81,014 (25.2%)	200,636 (28.7%)	606.1M (73.7%)
North Carolina	80,479 (74.1%)	174,598 (75.4%)	249.3M (74.5%)
West Virginia	34,375 (88.5%)	71,130 (88.6%)	36M (82.4%)
Ohio	19,281 (15.7%)	49,802 (19%)	192.4M (62%)
Illinois	**15,886 (10.9%)**	**42,229 (13.8%)**	**152.7M (54.2%)**
California	14,869 (8.4%)	51,729 (11.3%)	500.6M (57.7%)
Indiana	11,059 (11.4%)	28,729 (14.2%)	114.4M (49%)
Kansas	10,294 (7.4%)	24,064 (8.5%)	46.6M (53.5%)
Michigan	9,654 (7.9%)	27,382 (10.7%)	141.3M (52.5%)
Iowa	8,892 (7.7%)	23,286 (9.8%)	57.8M (63.5%)
Delaware	5,503 (82.6%)	12,071 (83.8%)	21.9M (82.5%)
New Jersey	2,316 (6%)	8,525 (10.1%)	83.9M (39.3%)

When this local autonomy is combined with the nation's largest number of local governments, the result is a decentralized system. While this model empowers communities to be responsive to local needs, it also means a single transportation project can easily cross multiple jurisdictional lines, each with its own priorities, regulations, and approval processes. For example, a home rule city can adopt its own "Complete Streets" ordinance, leading to situations where a bike lane or sidewalk suddenly ends at the city limit where a neighboring township has different standards.

This patchwork of responsibilities demands extensive and often inefficient coordination, a model that stands in contrast to the more centralized county-led systems in states like Texas or Florida. In Illinois, a single project might require approvals from the State for the right-of-way, a county for drainage, a municipality for sidewalks, and a township for maintenance. As a result, even minor modifications can become intricate endeavors. To manage these challenges, many state DOTs are evolving from regulators to active partners, providing enhanced technical support and flexible funding. A key example is the use of bridge "bundling" programs, where the state DOT provides high-level engineering and project management to group locally owned bridges into a single contract, demonstrating a shift toward providing tangible resources to help local agencies succeed.

[34] Federal Highway Administration, Highway Statistics 2023, Table HM-81

Observation #7 — Centralized IDOT Approvals and Inflexible Standards Hinder Efficient Local Project Execution

While local governments have jurisdiction over the majority of Illinois's road miles, they remain heavily reliant on IDOT for project approval and funding, particularly when federal or state dollars are involved. This dependency creates a challenge, as IDOT's highly centralized processes were not designed to accommodate the volume and variety of local needs, resulting in systemic bottlenecks that delay projects.

Two core issues define this inefficiency. First, local agencies must rely on IDOT's seven annual centralized lettings to procure construction contracts. This schedule often fails to align with local project timelines, meaning a project that misses a deadline can lose an entire construction season. Second, IDOT's centralized review processes for design, environmental surveys, and local agency agreements require long lead times and can generate conflicting feedback across multiple review rounds, adding months or even years to project schedules.

This friction is exacerbated by a mismatch between IDOT's design standards and local needs. IDOT's standards were developed for high-speed State highways and often cannot accommodate the pedestrian-centered, multimodal designs needed for local "main streets," even when such improvements are aligned with community priorities. To deviate from these standards, local agencies must undertake a costly and time-consuming design exception process, adding an administrative burden to projects that communities view as essential for safety and economic development.

To mitigate these challenges, many other state DOTs have evolved from purely regulatory roles to one of active partners by delegating project delivery authority to local agencies. These states address bottlenecks by empowering qualified local governments to manage their own project letting and design reviews, reducing reliance on a centralized state schedule. For example, the Florida Department of Transportation's Local Agency Program (LAP) uses a formal certification process to grant counties and cities the authority to manage their own project lettings and design reviews. Similarly, the Texas Department of Transportation (TxDOT) uses a risk-based approach where qualified local governments can administer their own projects, including procurement, under an Advance Funding Agreement. The Missouri Department of Transportation (MoDOT) also empowers local agencies through a partnership model outlined in its detailed Engineering Policy Guide. These models of delegated authority streamline approvals and empower local governments to deliver projects more efficiently, avoiding the bottlenecks common in a more centralized system.

Observation #8 — Disparities in Technical Capabilities Impact Local Project Success

While delegating more authority to local governments is a potential strategy for improving efficiency, its effectiveness may be limited by the vast disparity in technical capacity among Illinois's many local agencies. The success of modern transportation projects depends on specialized capabilities in project management, cost estimation, and regulatory compliance—skills that are not evenly distributed across the state.

Many larger municipalities and those within a MPO have access to professional staff and technical support. However, a number of smaller and rural communities outside of MPO service areas lack the in-house resources to manage these complex processes effectively. This "capacity gap" creates

challenges for underserved communities, who often struggle with accurate cost estimation and risk management. Without access to up-to-date market data and risk assessment tools, these agencies are more likely to underestimate costs or overlook regulatory requirements, leading to budget shortfalls and project delays.

This disparity represents a major obstacle to the equitable and effective delivery of transportation projects statewide. A one-size-fits-all approach to delegation disproportionately benefits high-capacity jurisdictions while leaving smaller communities behind. This observation highlights an opportunity for IDOT to evolve from a regulatory gatekeeper to a technical service provider, offering targeted support, standardized tools, and expert guidance to build capacity and ensure all communities can successfully deliver projects.

Observation #9 — Rigid Funding Policies Hinders Local Project Efficiency

Traditional transportation funding policies in Illinois can often create a structural mismatch, as their rigid, one-size-fits-all nature fails to address the diverse needs of the state's many local governments. This inflexibility forces communities to navigate complex requirements or wait for the right funding category to open, a process that creates administrative burdens, project delays, and overall system inefficiency. While necessary for compliance, the administrative requirements associated with federal funding add layers of complexity that can be disproportionate to the scale of smaller local projects. This complexity creates a disincentive for local agencies to pursue federal aid for routine work, as the administrative burden can outweigh the financial benefit.

This inflexibility is most evident in two key areas. First, under current federal policy, locally funded preliminary engineering work often cannot be counted toward the required local match for federal construction funds. This rule effectively penalizes local agencies for being proactive and can force them into a slower, federally managed process to maximize their grant dollars. Second, the current system lacks a straightforward mechanism for local agencies to swap their administratively burdensome federal Surface Transportation Program (STP) funds for more flexible State MFT funds, preventing them from choosing a more efficient path for smaller projects.

The BRC concludes that these systemic funding rigidities are a long-standing source of frustration for local governments and a barrier to efficient project delivery. Addressing these administrative knots by increasing funding flexibility is essential to empowering local agencies and improving the overall efficiency of transportation investment across Illinois.

Recent Progress

IDOT has made tangible progress toward addressing many of the governance challenges outlined in this report. These actions demonstrate a proactive shift from a centralized regulator to a more supportive partner for local governments by facilitating jurisdictional transfers, streamlining project delivery, and improving program transparency.

Advancing a More Equitable Jurisdictional Transfer Process:

In a direct effort to address the challenges of State-owned "main streets," IDOT has begun reviewing its financial contribution levels for jurisdictional transfers. The goal is to create a more equitable model that bases contributions on the actual condition of the infrastructure and current market costs, making it more feasible for local agencies to assume control of these roadways.

Streamlining Local Project Delivery through Bundling:

To help local agencies accelerate the replacement of smaller structures, IDOT launched a $100 million Off-System Bridge Bundling Program. This initiative provides direct support by grouping up to 180 locally owned structures into more efficient contract packages, streamlining both design and construction and providing economies of scale.

Reallocating Funds to Shovel-Ready Local Projects:

Demonstrating a more nimble and active approach to program management, IDOT has reallocated $400 million in State funding to a new competitive grant program for local projects that are "shovel ready." This infusion of capital helps local governments address their most pressing needs while also ensuring that available funds are used efficiently on projects that are ready to proceed.

BRC Duty #4:

Current and Future Workforce Needs

Blue-Ribbon Commission Duty #4

Evaluate current and future workforce needs to design, construct, and manage the state's transportation system within the Illinois Department of Transportation and within the State as a whole

Background

IDOT is responsible for managing one of the nation's largest and most complex transportation systems. This mission is carried out by a hybrid workforce model composed of two components: (1) an internal team of State employees and (2) an external network of private sector consultants, contractors, and industry partners who provide specialized services and construction capacity. Together, these internal and external workforces execute the planning, delivery, and maintenance of the State's multi-billion-dollar transportation program.

Internally, IDOT's workforce consists of approximately 5,000 public servants across a wide range of professional disciplines. This includes the civil engineers, technicians, and planners who design and oversee projects; the maintenance crews who operate and preserve the state's highways and bridges; and the administrative staff who manage finances, procurement, and regulatory compliance. These State employees are responsible for the agency's long-range planning, program management, and ensuring that all work meets required State and federal standards.

The management of this internal workforce is handled through a dual structure. IDOT's own Bureau of Human Resources is responsible for day-to-day HR functions, such as processing personnel transactions, managing labor relations, and coordinating training. However, CMS, the State's central administrative agency, retains ultimate authority over policies governing hiring, compensation, and personnel management.

To supplement its internal staff, IDOT engages an external workforce of private engineering and design consultants. These firms are procured through the Professional Transportation Bulletin (PTB) to perform a wide range of services, from preliminary engineering and environmental studies to detailed design and construction inspection. This partnership allows IDOT to access specialized expertise on demand and provides the flexibility to scale its delivery capacity to meet the demands of the program.

The external workforce also includes the construction industry, comprised the contractors and skilled trade laborers who physically build and repair the State's infrastructure. These partners are procured through IDOT's public letting process and are responsible for executing the projects on the ground. A large portion of IDOT's capital budget is ultimately directed to these construction contractors and their employees.

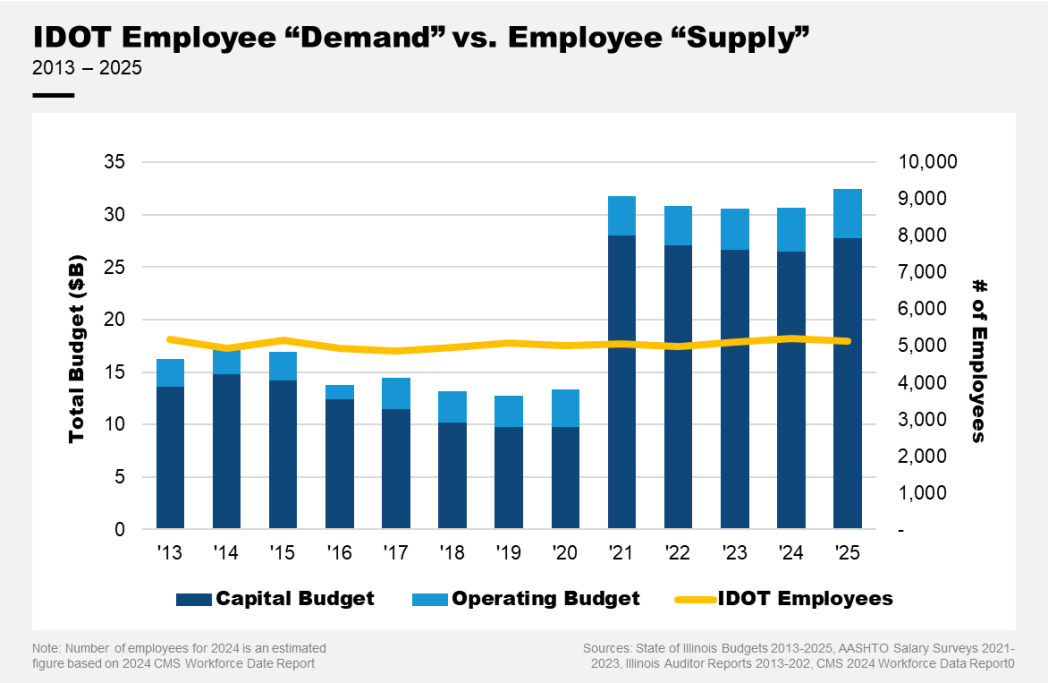
BRC Observations

The BRC's analysis examined capabilities of both the internal staff at IDOT and the external network of private contractors and consultants who partner with the Department, which showed that an imbalance exists between the unprecedented scale of the State's current infrastructure goals and the capacity of the workforce to achieve them. The BRC's analysis revealed that IDOT's staffing levels have not kept pace with its expanded responsibilities, a challenge that is intensified by systemic difficulties in

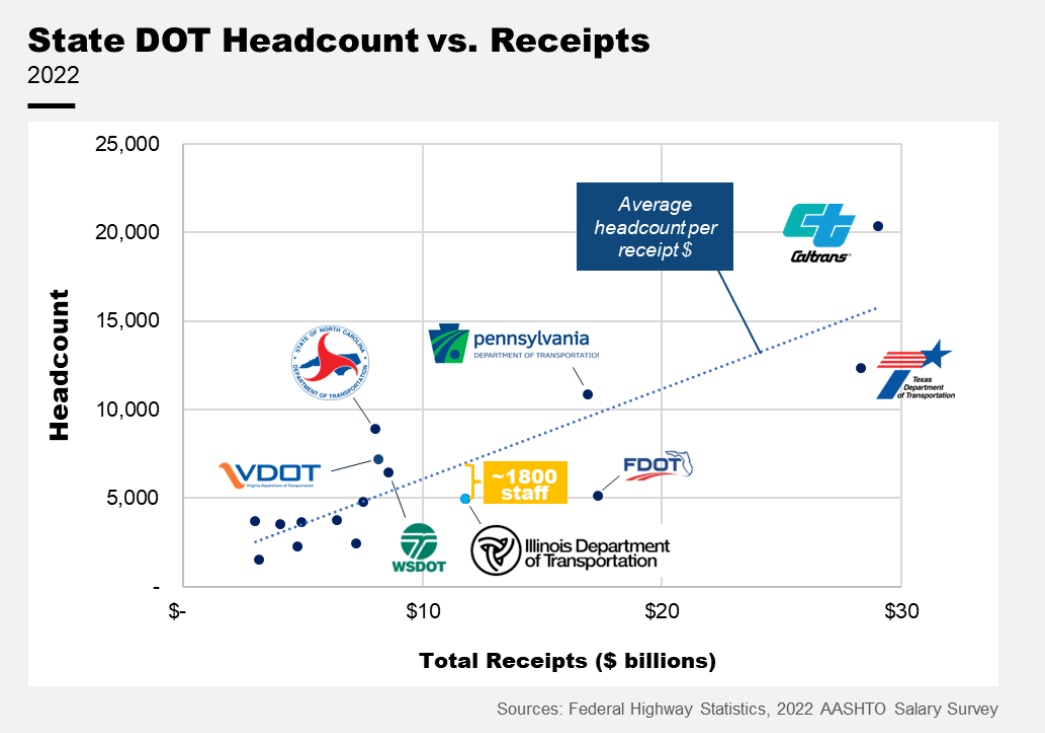
attracting, hiring, and retaining talent. Furthermore, these internal constraints are compounded by parallel capacity limitations with industry partners. The BRC concludes that addressing these interconnected workforce challenges is essential to ensuring the timely and cost-effective delivery of the capital program.

Observation #10 — IDOT Needs More Staff

IDOT is currently tasked with delivering a $50.6 billion multi-year capital program, the largest in the State's history and a five-fold increase from the $10 billion program in 2019. Despite this increase in workload and responsibility, the Department's headcount has remained relatively static over this same period. Since the mid-2010s, IDOT's overall headcount has hovered around 5,000 staff, even as the capital program has more than doubled since 2020 with the addition of Rebuild Illinois and the Infrastructure Investment and Jobs Act. This mismatch between workload and capacity creates operational strain that challenges the Department's ability to deliver on its commitments.



When IDOT's workforce capacity is benchmarked against its peer state DOTs, IDOT shows a relatively small workforce size given the scale of its program when measured against multiple criteria. For example, when comparing annual highway "receipts" against total headcount, IDOT is approximately 1,800 staff below the average.



This staffing gap can be further evidenced by the results of IDOT's employee survey, which showed that approximately 50% of IDOT staff feel overwhelmed by their current workload.[35] Furthermore, in a 2024 CMS survey, 71% of IDOT respondents cited a need for more staffing as the top barrier to their productivity—a figure that was nearly twice the next highest barrier of excessive workload (37%) and higher than the 55% average for all State agencies.

Based on its analysis of peer DOTs, the BRC originally estimated that IDOT requires an additional 1,400 to 2,000 FTEs to effectively deliver on its capital program and core mission (see Recommendation 8A).[36] This range reflects both the staffing levels needed to match peer state DOT ratios and IDOT's historical workforce size when managing similarly sized programs.[37]

Following the passing of SB 2111, the BRC revises this recommendation to reflect a potential decrease in IDOT's annual revenue of approximately $1b per RTA. This represents approximately a 12% reduction in the department's $8.4 billion annual capital program. Consequently, the BRC has adjusted its headcount recommendation by a proportional amount (12%) to a range of approximately 1,200 to 1,700 FTEs. IDOT and ILGA will need to monitor and update this revised range, particularly as new revenue sources are explored to offset the reallocation of funds.

[35] In October 2025, IDOT conducted a survey of all employees based on BRC recommendations. Over 1,600 IDOT employees responded to the survey.
[36] This staffing estimate was derived through multiple methodologies. First, the BRC benchmarked IDOT's current headcount-to-receipts ratio against peer state DOTs with similarly sized transportation systems and capital programs. Second, the BRC conducted historical analysis showing that IDOT employed 6,822 staff in 2002 when managing a similarly sized capital program, suggesting current staffing levels are inadequate for the department's workload. The range of 1,400 to 2,000 FTEs reflects variation in peer state staffing levels and accounts for the potential impact of other capacity improvement strategies, including increased use of contractors, process improvements, and technology adoption. As detailed in Recommendation 8A, IDOT should validate this target range internally and in consultation with CMS and GOMB, with provisions for regular evaluation and adjustment based on changing operational needs. These estimates were also compared to other metrics such as capital budget and operating budget size which also indicated IDOT's staffing levels were below averages.
[37] 2002 IDOT Audit

While increasing headcount is one solution for increasing capacity, given the scale of IDOT's capacity gaps, the BRC also believes a holistic portfolio of strategies will be required to rapidly meet these needs. While increased staffing is essential, IDOT should also pursue complementary capacity-building measures, including greater use of external contractors and consultants, process improvements, and technology adoption such as AI and automation.

Observation #11 — Challenges with Attracting, Hiring and Retaining Talent Limit IDOT's Ability to Address Staffing Needs

IDOT's workforce capacity is constrained by a convergence of interconnected challenges in hiring, talent attraction, and retention. These issues feed into one another, creating a downward spiral: slow hiring processes cause IDOT to lose top candidates, which leads to overextended staff who burn out and depart. The resulting shortages place even greater strain on the remaining employees, further undermining the Department's ability to recruit and retain the talent needed to deliver on its mission.

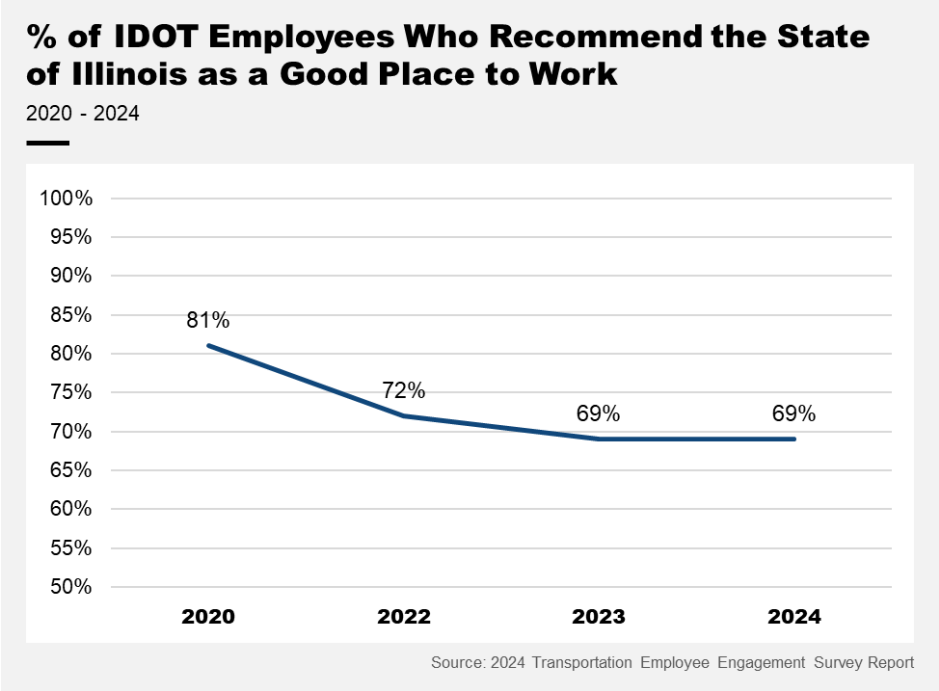
Hiring

A primary obstacle for IDOT is the complexity and length of the State's hiring process. As a State agency, IDOT's recruitment is managed in coordination with CMS. This dual-agency structure requires a multi-layered process of approvals, including position postings, application reviews, interview scheduling, and final offer letters, all of which must navigate both IDOT and CMS administrative channels. According to IDOT staff, this multi-step process can often cause the time-to-hire to stretch from 8 to 12 months. While IDOT has undertaken reforms to streamline its internal procedures, these systemic delays remain a competitive disadvantage, causing highly qualified candidates—particularly in high-demand technical fields—to accept offers from more agile private sector employers before the State's process is complete.

Talent Attraction

IDOT faces hurdles in both attracting and retaining a sufficient pool of qualified candidates, particularly for specialized engineering, technical, and IT roles. These challenges stem from uncompetitive compensation, a declining employer brand, and broader workforce shortages:

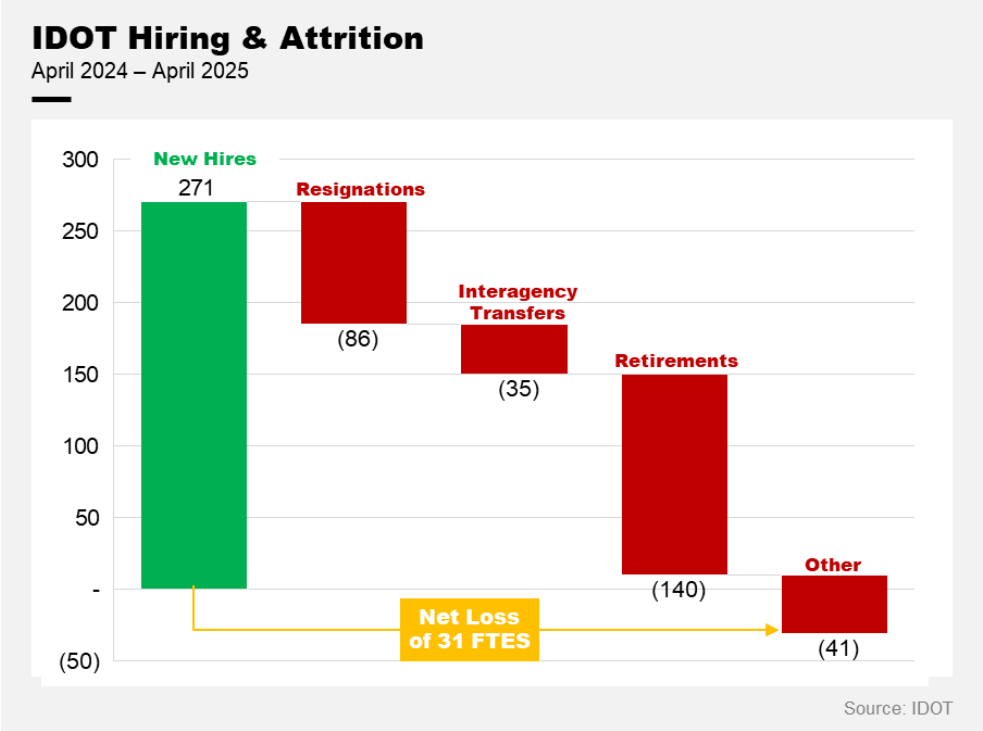
- **Salary Competition:** The Department's compensation packages often cannot compete with those offered by the private sector. The 2025 IDOT Employee Survey revealed that compensation was the second most important factor for current employees in their decision to join the agency, highlighting this as a critical recruitment and retention issue.
- **Geographic Location**: Many of the Department's district offices and facilities are located in areas with smaller talent pools, making it difficult to recruit for specialized positions. While these locations are essential for managing the statewide transportation network, they can be a deterrent for professionals who prefer to live and work in larger metropolitan areas.
- **Employer Brand**: The State's appeal as an employer is waning among IDOT staff. According to the 2024 CMS employee engagement survey, the percentage of IDOT employees who recommend the State of Illinois as a good place to work has dropped 12 points since 2020 (from 81% to 69%), falling 10 points below the average for all State agencies (79%).



- **Talent Pipelines:** IDOT's internal pipeline programs, such as the Professional Advancement of Civil Engineers (PACE) and the Cooperative Education Program (COOP), have seen their capacity and geographic reach decline. Similarly, workforce development efforts for the external contractor community, like the Highway Construction Careers Training Program (HCCTP), are fragmented and lack a unified statewide strategy, limiting their ability to connect with underrepresented groups.

Talent Retention

Compounding the difficulties in hiring is the growing challenge of retaining experienced staff. Although IDOT is one of the most active State agencies in terms of monthly hiring, it also experiences a similarly high level of turnover that often offsets these gains. For example, from April 2024 to April 2025, while the Department hired 271 staff, it also lost 86 from resignations, 35 from transfers to other State agencies, 140 from retirements, and 41 from other causes—resulting in a net loss of 31 FTEs. This high attrition makes it difficult to reduce the overall vacancy rate and build a compelling case for headcount expansion.



IDOT's attrition is driven by two primary factors. First, the Department is facing a wave of retirements, as a substantial portion of its most tenured employees reach eligibility. As of June 30, 2024, more than 804 of IDOT's current staff are eligible to retire—approximately 16% of all IDOT staff—representing a critical impending loss of institutional knowledge and leadership. Second, turnover is fueled by resignations and transfers stemming from declining employee satisfaction. As employee surveys have indicated, feelings of being overworked, dissatisfaction with opportunities for career advancement, and a general sense of being understaffed contribute to burnout and lead skilled employees to seek opportunities elsewhere.

Observation #12 — Industry Partners Are Also Facing Capacity Constraints

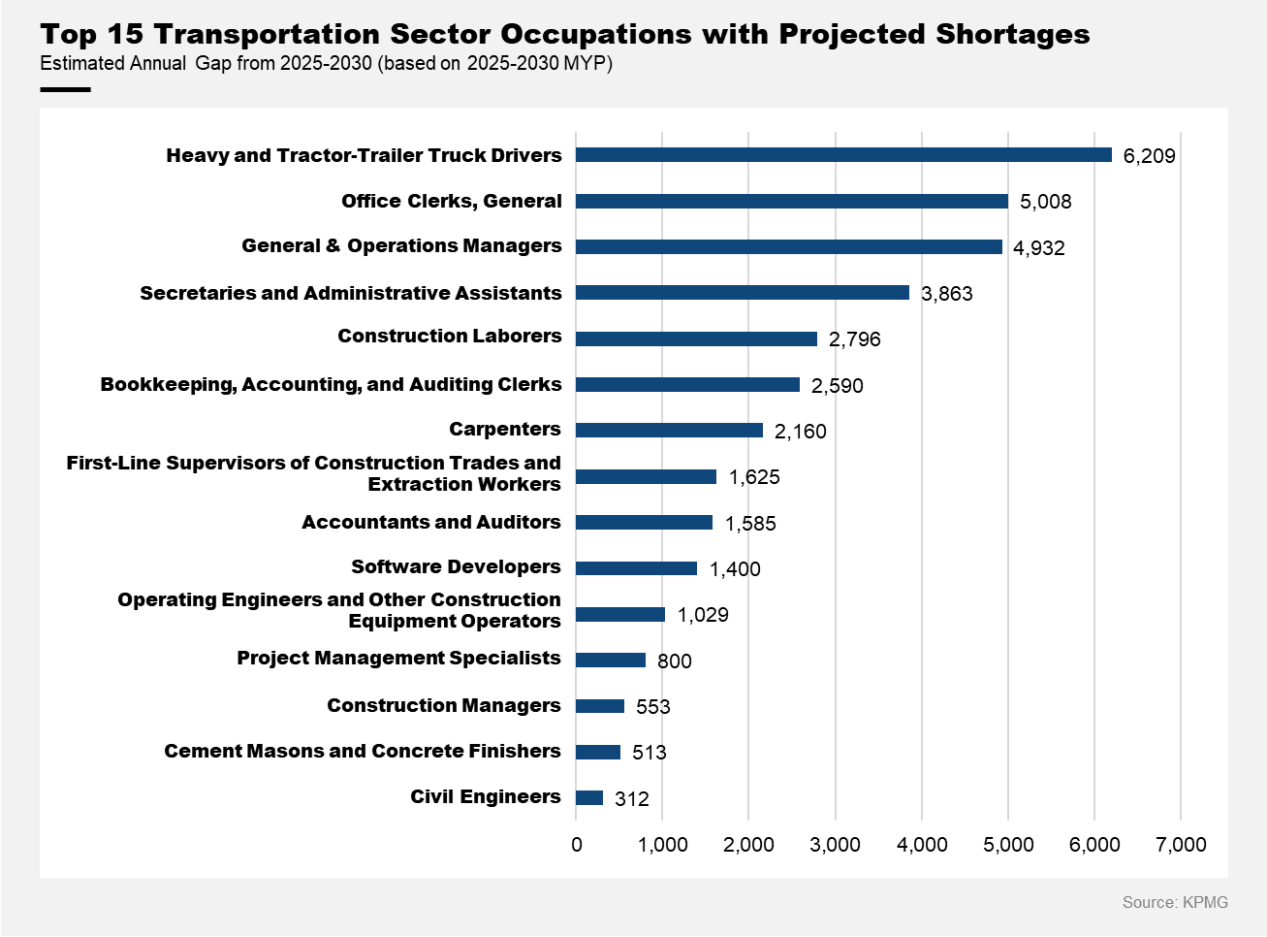
The successful delivery of the State's historic capital program depends not only on IDOT's internal capacity but equally on the capacity of the external workforce, including construction firms, engineering firms, and other professional services. The construction industry, in particular, is facing capacity constraints nationwide that are impacting DOTs the delivery of transportation. This crisis is built on three core constraints: financial pressures, unprecedented supply chain volatility, and workforce shortages.

Financially, the construction sector for heavy civil work is characterized by thin profit margins and a high rate of business failure, with nearly two-thirds of companies failing within a decade.[38] This precarious financial position is exacerbated by volatile material costs, which have risen over 38% since 2020 and reduced margins, and procurement challenges such as long lead times or compliance with

[38] According to the U.S. Bureau of Labor Statistics, a construction company has only a 36.4% chance of surviving past its fifth year of operation.

"Buy America" (BABAA).[39,40] With such high risks, fewer firms have the financial stability and risk tolerance to bid on large, complex transportation projects. This dynamic shrinks the pool of qualified bidders, reducing overall industry capacity and leading to a less competitive environment where DOTs face higher project costs and fewer options.

This market vulnerability is compounded by a severe, nationwide workforce crisis, with the transportation sector projected to face critical staffing shortages in the coming years. For Illinois, by comparing projected workforce demand from the 2025-2030 MYP to the available labor supply, the BRC identified the top 15 job categories with projected shortages, including field roles like heavy equipment operators and construction managers, as well as project management and administrative support.[41]



These workforce shortages not only limit capacity of contractors, resulting in less competitive bidding, but can also result in a less experienced workforce, forcing DOTs and their prime contractors to expend more time and resources on management, training, and oversight. With IDOT continuing to release

[39] Analysis of Producer Price Index (PPI) data shows that overall input costs for construction have risen 38.7% since February 2020.
[40] An Associated General Contractors of America (AGC) survey noted that 93% of survey respondents were experiencing long lead times and/or allocations (less-than-full shipments) for construction materials.
[41] The occupations listed were identified by projecting workforce gaps for 2025-2030. Labor demand was calculated by combining new direct employment from planned 2025 – 2030 MYP investments with existing Bureau of Labor Statistics (BLS) demand projections. Labor supply was projected based on current employment levels, educational program completions, and demographic trends, including anticipated retirements and new entrants to the workforce. The total demand was then compared against this projected supply to determine the average annual shortage.

record-breaking capital programs, the BRC recognizes there is a risk the Illinois' industry partners cannot increase capacity at the pace needed to support delivery.

Several other state DOTs, facing similar external capacity constraints, have begun implementing proactive strategies to address the issue. The Florida Department of Transportation (FDOT), for example, has established a "Construction Workforce Development Program" that provides grants to technical colleges and trade schools to create customized training programs for high-demand construction skills. Similarly, the Ohio Department of Transportation (ODOT) has launched a statewide "Trades-Oriented Outreach" initiative that partners directly with construction firms and labor unions to host career fairs and pre-apprenticeship information sessions in underserved communities, actively working to expand the talent pipeline for its contractor partners.

Observation #13 — There is an Opportunity to Evolve IDOT's Human Resources and Information Technology Functions to Further Support IDOT's Workforce

The Commission's analysis indicates that there is a valuable opportunity to enhance the capabilities of IDOT's Bureau of Human Resources as well as the Bureau of Information Processing (BIP) to better support the agency's large and complex workforce and technology needs.

Currently, the Bureau of Human Resources operates as a transactional unit focused on processing personnel actions and ensuring regulatory compliance. While essential, this administrative focus could be expanded to include the more strategic responsibilities required to manage a workforce of IDOT's scale. By developing modern, data-driven capabilities, the Bureau of Human Resources could become a more strategic partner in workforce management.

This approach aligns with leading practices at peer state DOTs that have successfully transformed their HR functions. For example, the Virginia Department of Transportation (VDOT) has a dedicated Workforce Planning and Development Division that uses predictive analytics to forecast future staffing needs and partners with universities to build targeted recruitment pipelines. Similarly, TxDOT has implemented a robust Succession Planning Program that identifies and develops internal candidates for future leadership roles, ensuring continuity and institutional knowledge. The Bureau of Human Resources should have the capability to effectively execute proactive talent acquisition, long-range workforce planning, formal succession planning, and strategic change management.

Additionally, the BIP plays a critical role in enabling consistent data use and standardized business operations across the Department. However, BIP currently lacks the authority and capabilities to deliver the needed support across IDOT's 9 districts due to a recent interagency agreement that transferred a substantial portion of BIP's responsibilities to DoIT. However, this transfer has introduced challenges in aligning IT support with the specific, time-sensitive needs of IDOT's on-the-ground field operations. Developing in-house IT capacity at IDOT for these routine tasks will enable IDOT staff to focus on project delivery without compromising data governance and operational consistency across Illinois State agencies.

By investing in its Human Resources and Information Processing bureaus, IDOT can build the modern, in-house capabilities essential for its long-term success. This will transform HR into a proactive partner in talent management and ensure IT support is directly aligned with the critical needs of project delivery. Ultimately, these investments will equip IDOT to build, sustain, and support the expert workforce required to deliver on its mission for the state of Illinois.

Recent Progress

IDOT has demonstrated momentum in addressing its workforce challenges through strategic initiatives across recruitment, retention, and process improvement. These recent accomplishments reflect the Department's commitment to building the organizational capacity required to meet its historic infrastructure demands while maintaining operations across the state's transportation network.

Reforming the Hiring Process:

In collaboration with CMS, IDOT has fundamentally redesigned its recruitment process, reducing the number of hiring steps from over 100 to just 16. To accelerate its most critical recruitments, the Department implemented a new "Standardized Hiring Plan" for engineers that removes interview requirements, saving approximately 10 weeks in processing time. These reforms are supported by a comprehensive new dashboard for real-time visibility into hiring and a new requisition portal to better manage HR resources.

Setting Short-Term Hiring Goals:

To combat enterprise-wide staffing shortages, IDOT has established an immediate goal of hiring 600 FTEs by the end of 2025. This initiative is a proactive first step to fill critical vacancies, enhance project delivery capacity, and preserve institutional knowledge ahead of a significant wave of retirements. This hiring target also serves as a foundational component for a broader, medium-term workforce expansion strategy.

Boosting Talent Attraction and Retention:

To better compete for talent, IDOT has secured competitive salary increases for its engineering trainees and interns and is preparing a student loan repayment pilot program. The Department has also expanded its recruitment strategy to span 13 states and 7 Historically Black Colleges and Universities (HBCUs). To address geographic hiring challenges and attract university talent, IDOT has established new satellite offices in strategic locations, including a new office in Champaign. These efforts are complemented by an "Intern to Hire" program, creating a more structured pathway for converting interns into full-time employees.

Implementing a Data-Driven Approach to Employee Engagement

As a direct result of the BRC's analysis, IDOT conducted a comprehensive employee engagement survey to systematically capture workforce perspectives on job satisfaction, workload, and retention. The Department plans to use this data to establish an ongoing framework for gathering and acting on employee feedback, ensuring that future workforce strategies are grounded in the direct experience of its staff.

BRC Duty #5:

Current and Future Data Needs

Blue-Ribbon Commission Duty #5

Evaluate current and future data needs of the Illinois Department of Transportation

Background

The effective management of a modern transportation system relies on the collection, analysis, and application of vast amounts of data. For IDOT, data is a foundational asset that informs everything from real-time operational decisions to long-term investment planning. The complexity of the state's transportation network, which encompasses highways, public transit, railways, airports, and waterways, necessitates a robust and multifaceted approach to data. IDOT gathers, processes, and utilizes a wide array of data to support its mission, serving not only the agency's internal needs but also those of public and private stakeholders across Illinois.

IDOT's data ecosystem is comprised information from a variety of sources. The agency directly collects a large amount of data through its own resources, including traffic volumes, real-time travel conditions from a statewide network of cameras and weather stations, and detailed information on the condition of State-owned assets like roads and bridges. In addition to direct collection, IDOT compiles extensive data from other government partners. Law enforcement agencies provide critical information on crashes and traffic stops, which is vital for safety analysis and planning, while local governments and transit agencies contribute data on their respective systems, such as local road networks, bicycle facilities, and transit routes. This interagency coordination is essential for creating a comprehensive picture of the state's entire transportation landscape.

IDOT also acquires data from third-party sources. These external datasets provide additional layers of information that enhance the agency's analytical capabilities. Examples of third-party data include real-time traffic and travel information, and detailed demographic and travel pattern data derived from mobile devices and vehicle GPS systems. These partnerships with private data providers are increasingly crucial for understanding complex travel behaviors and improving transportation models. Data from academic institutions and sponsored research also contribute to IDOT's knowledge base, often providing new insights and analytical methods.

A change in the operational structure of Illinois State agencies occurred with the consolidation of information technology (IT) functions under the centralized authority of DoIT. This strategic move, initiated by statute in 2018, was part of a broader statewide digital transformation aimed at creating an enterprise-level approach to technology. The primary goals were to enhance efficiency, improve service delivery, strengthen security and data protection, and eliminate redundant systems and spending across State government.

For IDOT, this meant that responsibility for foundational IT infrastructure and services was transferred to DoIT. DoIT now manages the hardware, servers, networks, telecommunications, and enterprise-wide systems that support IDOT's operations. However, this consolidation draws a clear line between technology infrastructure and business-specific functions. IDOT retains full ownership and stewardship of its transportation-related data and the specialized software applications used to manage it. Agency subject matter experts remain responsible for defining data needs, ensuring data quality, and performing the critical analysis required to plan, build, and maintain the state's transportation network.

This collaborative model necessitates a strong partnership, where IDOT defines its operational and data requirements, and DoIT provides the secure and reliable technological framework to meet those needs.

BRC Observations

In the 21st century, data and technology are no longer support functions but core components of a modern transportation agency's ability to deliver its mission efficiently and effectively. The BRC's analysis of IDOT's data and technology landscape reveals a system with opportunities for modernization. While IDOT collects vast amounts of data, its ability to use this information strategically is hindered by a fragmented technology ecosystem, the absence of a formal data governance framework, and the limited adoption of modern analytical tools. The following observations detail how these interconnected challenges create inefficiencies, limit transparency, and prevent the agency from maximizing the value of its data as a strategic asset.

Observation #14	Gaps in Foundational Technology and Data Hinder Program Delivery

IDOT's effectiveness is constrained by critical gaps in the foundational data and enterprise technology needed to manage its core business functions. The lack of a modern Project Management Information System (PMIS), for example, prevents an accurate, portfolio-level view of cost, schedule, and scope, driving reactive rather than proactive management. Without a "single source of truth" for the State's multi-billion-dollar capital program, essential project information is fragmented across a patchwork of disconnected spreadsheets and siloed databases, making it nearly impossible to gain a reliable, real-time view of the status of the capital program.

This data fragmentation extends beyond project delivery. Across the agency, critical information related to safety, asset management, and operations is often stored in separate systems that were not designed to be interoperable. This siloing of data makes can make it difficult to get a comprehensive, system-wide view of the transportation network. For example, integrating crash data with asset condition data and real-time operational information is a manual and time-consuming process that limits the agency's ability to conduct advanced, proactive safety and mobility analyses.

Leading state DOTs have made strategic investments to overcome these challenges.
The Pennsylvania Department of Transportation (PennDOT), for example, deployed an enterprise-wide Engineering and Construction Management System (ECMS) to standardize project delivery and ensure data consistency. Similarly, VDOT is migrating its disparate data sources into a unified cloud data warehouse to provide analysts with easier access to integrated information. By not yet adopting a similar integrated approach, IDOT's ability to manage its investments effectively, ensure transparency, and foster a holistic understanding of its transportation system remains fundamentally challenged.

Observation #15 — Absence of a Formal Data Governance Program Limits Data Accessibility and Standardization

A gap exists in IDOT's formal management of data as a strategic enterprise asset. While individual bureaus collect and use data for their specific needs, there is no overarching data governance framework that establishes clear policies, standards, and roles across the entire organization. This absence leads to inconsistencies in data definitions, quality, and accessibility, which in turn hampers the ability to perform cross-functional analysis and make holistic, data-driven decisions.

IDOT is, however, beginning to address this challenge through its BIP data catalog project using Microsoft Purview. This in-progress initiative aims to provide a platform for data governance, create a singular location for data residing within the agency, and drive business value. While the full two-year project is yet to officially kick off, work has been ongoing to establish the Purview environment. This effort is expected to impact data discovery, secure access, enhance data value creation, and ensure the proper consumption of vetted data, setting the stage for improved management, standardization, and Artificial Intelligence opportunities.

This stands in contrast to leading state DOTs that have established comprehensive data governance bodies and strategic plans. The Indiana Department of Transportation (INDOT), for example, has a robust data governance program and formal stewardship roles to ensure data is managed consistently as an enterprise asset. Similarly, FDOT launched a "Reliable, Organized and Accurate Data Sharing (ROADS)" initiative to define a clear path for agency-wide data governance.

The Commission believes that while IDOT's Purview project is a positive step, without a fully implemented formal governance structure, IDOT faces ongoing challenges with data duplication and inefficient integration, which can lead to inconsistent analytical outcomes and prevent the agency from maximizing the full value of its data. A comprehensive data governance program, similar to those at INDOT and FDOT, will empower IDOT to fully treat data as a core asset, ensuring it is reliable, secure, and shareable, and thereby unlocking its full potential to support strategic goals.

Observation #16 — There Are Opportunities to Modernize IDOT's Technology, Including Advanced Analytics and AI

IDOT's effectiveness is constrained by a technology ecosystem that has not kept pace with modern advancements. This is evident in two key areas: the persistence of outdated legacy IT systems and the limited adoption of advanced analytics and Artificial Intelligence (AI) into core business functions. These issues are interconnected, as the agency's reliance on aging systems creates a barrier to implementing more innovative, data-driven technologies.

IDOT, like many large government agencies, operates on a number of legacy IT systems that are costly to maintain and difficult to integrate with modern platforms. This reliance on outdated technology is complicated by the State's centralized IT model, where DoIT manages foundational infrastructure. While intended to create efficiency, this structure can reduce IDOT's direct control over its technology environment, potentially slowing the procurement and deployment of specialized transportation software and tools.

This technological deficit directly limits the agency's ability to leverage advanced analytics and AI. While IDOT has engaged in some AI-related research with university partners, its overall adoption remains in the early stages. The potential for these technologies to add capacity and efficiency—

particularly in project delivery, predictive maintenance, and real-time operations—has not yet been realized. By not fully embracing these tools, IDOT risks falling behind other states in operational efficiency.

Leading public agencies are actively pursuing modernization to overcome these challenges. The U.S. Department of Agriculture, for example, successfully consolidated dozens of data centers into a cloud infrastructure to enhance efficiency. For IDOT, the path forward requires developing a clear modernization roadmap and forging a more agile partnership with DoIT. This will allow the agency to more effectively replace its legacy systems, take full advantage of modern cloud technologies, and create the foundation needed to integrate advanced analytics and AI into its core operations.

Recent Progress

In response to the data and technology challenges outlined in this report, IDOT has made progress in modernizing its technology ecosystem. Recent initiatives demonstrate a commitment to breaking down data silos, improving program transparency, and building the foundational infrastructure required for more advanced, data-driven management.

Improving Program Transparency and Financial Oversight:

To enhance public transparency and internal management, IDOT has launched a public-facing Cash Balance Dashboard. Internally, the agency has also implemented a Hiring Dashboard to provide real-time visibility into open positions and recruitment metrics, applying data analytics to address its own operational efficiency.

Modernizing Business Processes and Digital Delivery:

IDOT is actively piloting new technologies to modernize core business processes. This includes a DocuWare pilot to automate invoice validation and approval workflows, which aims to reduce manual data entry and shorten payment cycles. Furthermore, the agency has initiated a Digital Delivery pilot program using tools like Bluebeam and Bentley to move from traditional paper-based plans to modern, data-rich 3D models for design and construction management.

Preparing for the Adoption of Artificial Intelligence (AI):

IDOT has begun implementing generative AI tools like Microsoft Copilot to enhance staff productivity and has started developing a formal AI strategy to guide the responsible adoption of this technology. Critically, the agency is also modernizing its data-collection systems to enable future AI applications. A key example is the implementation of measurement-while-drilling (MWD) technology on geotechnical drill rigs, which gathers the rich, continuous subsurface data necessary for AI and machine learning analysis of soil conditions.

BRC Duty #6:

Project Approval and Completion

Blue-Ribbon Commission Duty #6

Consider and recommend steps to **expedite project approval and completion**

Background

The delivery of transportation projects in Illinois is a complex process managed by IDOT. As the agency responsible for both the State highway system and the administration of federal transportation funds, IDOT's procedures are designed to ensure all projects are planned and built in a manner that is financially responsible and technically proficient. This federally required, phased approach applies to projects on the State system as well as those led by local agencies using federal funds, creating a standardized framework for infrastructure development across Illinois. Understanding this process is essential to identifying opportunities for reform.

IDOT's Traditional Project Delivery Methods

IDOT's traditional project delivery method follows a structured, sequential framework often referred to as "Design-Bid-Build." These projects typically progress through five key phases, from initial programming to long-term maintenance:

- **Phase 0 – Programming:** Projects are identified, prioritized, and allocated funding through the MYP and other State and federal programs.
- **Phase I – Preliminary Engineering and Environmental Studies:** The project's purpose and need are defined, alternatives are analyzed, and required environmental reviews under the National Environmental Policy Act (NEPA) are completed.
- **Phase II – Design and Right-of-Way (ROW) Acquisition:** Detailed engineering designs are prepared, utility conflicts are addressed, necessary permits are secured, and all required land is acquired and certified.
- **Phase III – Construction:** The project is bid and awarded to a contractor, followed by field management and construction oversight.
- **Phase IV – Maintenance:** Upon completion, the asset is integrated into IDOT's system for routine maintenance, including snow and ice control, repairs, and emergency response.

For many IDOT projects, particularly those involving federal funding or complex requirements, this delivery process can span five to eight years or longer from initial programming to the start of construction.

Throughout this process, IDOT relies heavily on a partnership with the private sector. The Department engages consulting engineering firms to perform much of the specialized design work and partners with construction companies to physically build the infrastructure. This governance model is further decentralized across the state. IDOT's central office in Springfield is primarily responsible for setting statewide policy, developing technical standards, and managing broad, statewide programs. The

Department's nine district offices, however, are on the front lines, managing the day-to-day delivery of projects within their specific geographic regions and serving as the primary point of contact for local stakeholders.

IDOT's Alternative Project Delivery Methods

In addition to its traditional Design-Bid-Build approach, IDOT is authorized to use Alternative Project Delivery (APD) methods to accelerate timelines, manage complex risks, and foster innovation. These models, which include Design-Build (DB), Construction Manager/General Contractor (CM/GC), and P3s, offer a spectrum of options that primarily differ in the level of risk transferred from the public to the private sector. The primary benefit of these models is their ability to overlap design and construction phases, which can reduce project schedules and provide greater cost certainty.

However, IDOT's ability to utilize these methods is governed by a series of specific legislative requirements and limitations. The use of APD in Illinois is structured by several key statutory provisions that create specific guardrails for each delivery model:

- **Public-Private Partnerships:** Governed by the Public-Private Partnerships for Transportation Act, the use of P3s is the most heavily regulated. The Act requires IDOT to conduct a detailed "value-for-money" analysis and, most critically, secure a joint resolution from the ILGA before executing a major P3 agreement. The law also imposes quantitative limits, restricting IDOT to initiating no more than two new P3 projects per year, with a maximum of six active P3 procurements at any time. It also sets a project-cost floor, prohibiting P3s for projects estimated at less than $50 million.

- **Design-Build:** IDOT's authority to use the DB model, where a single contract covers both design and construction, is limited to a maximum of three projects per year.

- **Construction Manager/General Contractor:** The CM/GC model, which brings a contractor on board during the design phase to provide construction expertise, is also subject to statutory limits on the number and type of projects it can be applied to annually.

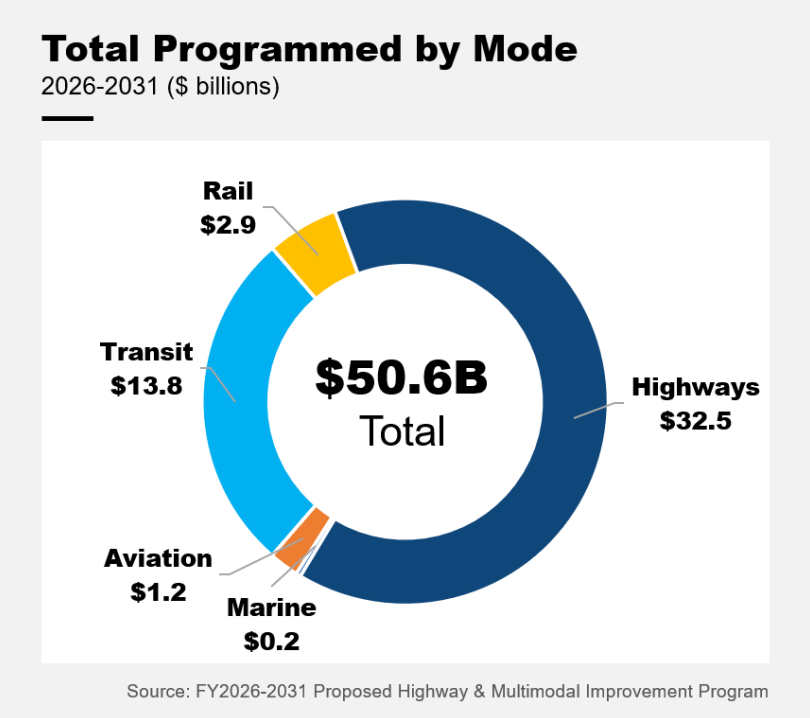
- **Alternative Technical Concepts (ATCs):** Even within traditional Design-Bid-Build projects, IDOT's ability to use ATCs—a process that allows bidders to propose innovative design or construction solutions—is statutorily capped at just three projects per year.

While IDOT has not yet completed a major highway P3 project, the Department has experience evaluating the model and is actively expanding its use of various APD methods within the existing legislative framework. A P3 is currently being leveraged for the development of the South Suburban Airport, and the Department previously evaluated the model for the Illiana Expressway and I-55 Managed Lanes projects.

Simultaneously, IDOT utilizes other APD models to accelerate key projects. The Department is in the pre-procurement phase for two Design-Build projects (a bridge bundle in LaSalle County and a large-scale ADA intersection improvement project in District 1) and is using the CM/GC model for a major drainage improvement project along the I-290 corridor. This demonstrates a growing commitment to leveraging these innovative delivery models to the extent currently allowed by State law.

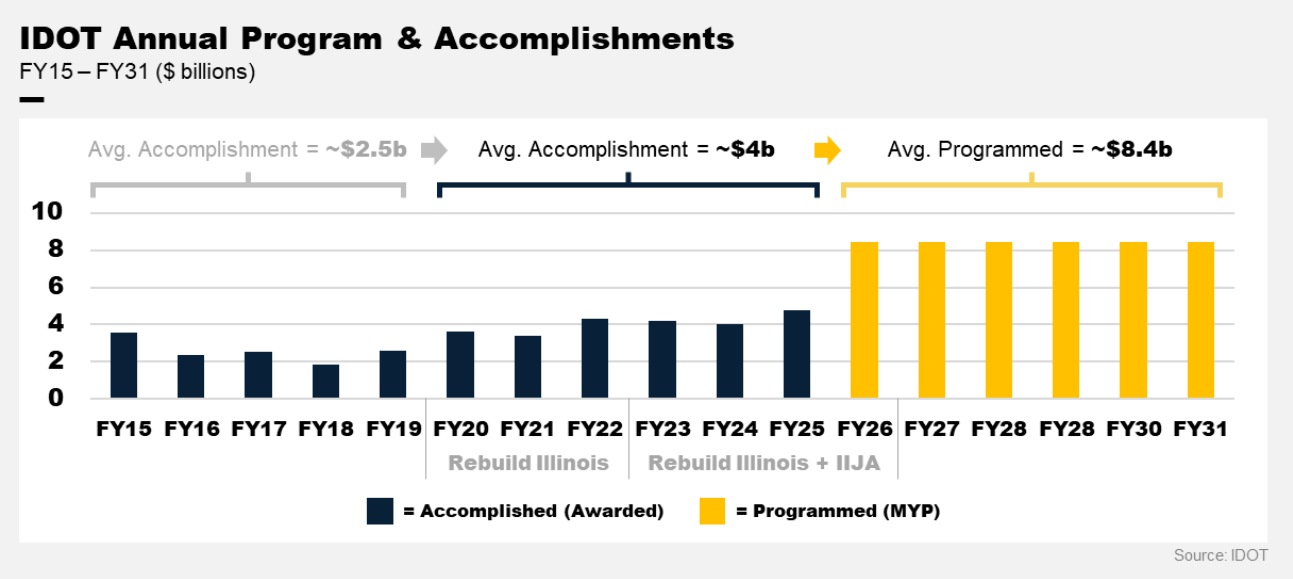
IDOT's Capital Program

IDOT is currently overseeing the largest and most ambitious capital program in Illinois's history, representing an unprecedented investment in the state's infrastructure at $50.6 billion in investment over 2026 through 2031.



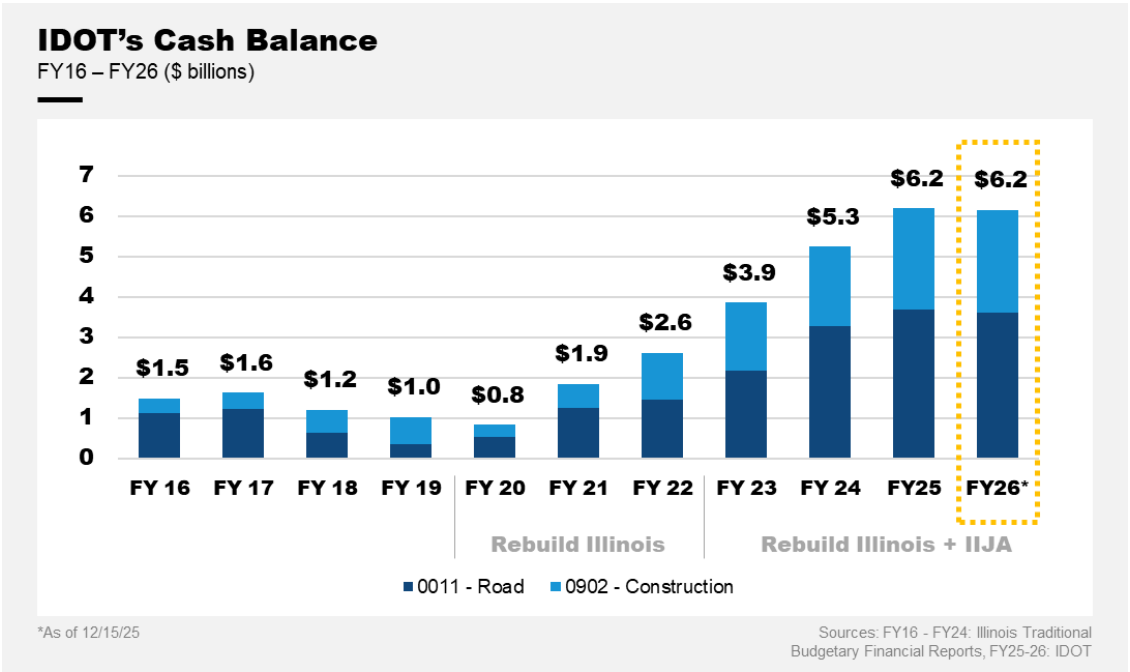
The program's growth has been particularly pronounced over the last decade, driven by the state's landmark Rebuild Illinois capital plan, enacted in FY2020, and the infusion of federal funds from the IIJA, which began in FY2023. Prior to these major legislative initiatives, from FY2015 through FY2019, IDOT's annual average "accomplishments"—the actual dollar amount of capital projects awarded—stood at approximately $2.5 billion. With the introduction of Rebuild Illinois and IIJA, the program's scale nearly doubled. From FY2020 through FY2025, IDOT's average annual accomplishments increased to approximately $4 billion. Notably, the Department achieved this increase in output without a corresponding large-scale increase in staffing, highlighting a remarkable, albeit strained, period of productivity.

Based on IDOT's current MYP, the Department now has approximately $8.4 billion programmed per year from FY2025 through FY2030, representing the need to increase accomplishments by nearly 2 times to meet the programmed amounts.



IDOT's Cash Balance

While funding has expanded, the people, processes, and technology that form the backbone of the Department's project delivery system have not evolved at a similar pace. This has created operational challenges, leading to project backlogs and a growing cash balance that now totals over $6.2 billion.[42]



Although, as of December 15, 2025, $5,3m (~85%) of this cash balance is already obligated to specific, planned projects, the rate at which funds are being expended has slowed, indicating a bottleneck between financial commitment and project execution. The impact of SB 2111 is also critical to

[42] As of December 15, 2025 (source: IDOT)

understand, as sources of funding are redirected have the potential of changing IDOT's annual capital program.

Reducing IDOT's large and growing cash balance is important for several interconnected reasons. First, a high cash balance represents taxpayer dollars that have been collected and committed to specific infrastructure projects but are sitting idle rather than being put to work. For the public, this translates into delayed benefits: roads and bridges that remain in disrepair, congestion that is not alleviated, and safety improvements that are not yet built. This also puts the funding at risk; large, unspent balances can create pressure to reallocate funds to other State priorities that are ready to be spent. Every year that a project is delayed, the public is deprived of the safer and more efficient transportation system they have already funded.

Furthermore, in an environment of high construction cost inflation, this unspent capital rapidly loses its purchasing power. A project that was estimated to cost a certain amount when it was initially funded may cost more by the time it is constructed, meaning the state can ultimately build less with the same amount of money. For the state's economy, a high cash balance represents a missed opportunity to create jobs and stimulate economic activity. By accelerating the expenditure of these funds, IDOT can more quickly inject this capital into the economy, supporting the construction industry and creating thousands of well-paying jobs for Illinois workers.

Finally, demonstrating the ability to efficiently deliver on its current program is essential for securing future investment. IDOT will eventually need to seek another major capital bill to address the state's ongoing infrastructure needs. Decreasing the current cash balance by effectively delivering projects is critical to giving the ILGA the confidence that the Department can responsibly and capably manage the funds entrusted to it, making the case for future capital bills much stronger.

Locally Delivered Projects

A large portion of transportation projects in Illinois are delivered not by IDOT itself, but by Local Public Agencies (LPAs), which include counties, municipalities, and other local governments. However, when these projects use federal or State funding, IDOT plays a critical oversight and stewardship role to ensure compliance with all applicable laws and regulations. In this capacity, IDOT acts as the State's steward for federal-aid funds, a responsibility delegated by the FHWA.

The delivery process for local projects is a collaborative partnership between the LPA and IDOT, structured to ensure accountability at every stage:

- **Project Development (Led by LPA):** The local agency is responsible for initiating and developing the project. This includes preparing all necessary engineering studies, conducting environmental reviews required by the National Environmental Policy Act (NEPA), and creating detailed design plans.

- **Review and Approval (Oversight by IDOT):** At each major milestone, the LPA submits its documents to IDOT for review and approval. IDOT's district Local Roads and Streets offices work directly with local sponsors to provide technical guidance and ensure all work complies with federal and State standards. Before construction can begin, IDOT must formally approve the bid documents and verify that all right-of-way and utility requirements have been met.

- **Construction and Administration (Managed by LPA, Overseen by IDOT**): While the LPA manages the construction contract, IDOT continues its oversight role by ensuring that contract changes, materials testing, and payment requests follow State and federal standards.

Through this process, IDOT administers hundreds of millions of dollars each year to local governments through key funding programs like STP and the Highway Safety Improvement Program (HSIP). IDOT's role is to confirm that these funds are distributed, managed, and documented correctly, which is essential for ensuring that Illinois remains eligible for future federal funding.

BRC Observations

The BRC's analysis of IDOT's project delivery process examined the end-to-end lifecycle of how transportation projects are planned, managed, and constructed in Illinois. The following observations reveal a system that, while rigorous, is hampered by a combination of internal process inefficiencies, external dependencies, and legislative constraints that limit the agency's ability to deliver its historic capital program with the speed and efficiency required.

IDOT's decentralized and often manual project management approach is not scaled to the complexity of the current program. This core internal challenge is magnified by project delays caused by lengthy coordination with external third parties like utilities and railroads. Furthermore, the agency's ability to use more innovative and accelerated project delivery methods is limited by restrictive legislative requirements. Taken together, these issues point to the need for a more proactive, centralized, and collaborative approach to program management—one that empowers IDOT to optimize its project pipeline, strengthen industry partnerships, and ensure that taxpayer dollars are put to work as efficiently as possible.

Observation #17	IDOT's Project Management Approach Needs Scaled to its Current Program Size

While IDOT has a long-established process for managing projects, its fundamental approach is not structured to support the scale, speed, and complexity of the current capital program. The Department's methodology is characterized by a decentralized delivery model, a reliance on manual processes, and a lack of standardized data systems. This structure creates inefficiencies, limits data-driven decision-making, and places an administrative burden on project managers.

This inefficiency stems from a highly fragmented management structure. With primary responsibility resting within its nine district offices, there is a lack of standardization in how projects are managed and data is reported. Compounding this, IDOT lacks a "cradle-to-grave" project management approach; responsibility is frequently handed over between different internal teams and external consulting firms as a project moves from one phase to the next. This frequent handoff process often leads to a loss of project history and inconsistent decision-making, resulting in rework and delays.

These procedural challenges are exacerbated by the absence of a modern, enterprise-level PMIS. Instead, IDOT relies on a collection of disparate systems, spreadsheets, and manual documentation. This lack of a "single source of truth" makes it difficult for leadership to gain real-time visibility into the entire project portfolio, identify systemic bottlenecks, or make proactive, data-driven decisions. Taken together, these issues foster a reactive, compliance-focused culture rather than one of active program management, where the capital program can be managed as a unified portfolio to optimize schedules and resources.

In contrast, many peer DOTs have moved toward more centralized and empowered models to overcome these challenges. The Texas and Michigan DOTs, for example, have established dedicated Offices of Major Projects to provide expert oversight for their most complex initiatives, while others, like the Washington and Colorado DOTs, improve coordination by embedding their own staff within key partner agencies. These leading practices demonstrate a strategic shift toward a more integrated, data-driven, and proactive approach to delivering large-scale capital programs

Observation #18 — Coordination with Third Parties Can Often Contribute to Delays

Project timelines are often dictated by complex and lengthy coordination with a wide range of external third parties. These entities—including property owners, utility companies, railroads, and federal and State regulatory agencies—operate on their own timelines and with their own distinct priorities. IDOT has limited control over these external processes, yet they are critical path-activities that must be completed before construction can begin. The cumulative effect of these dependencies creates uncertainty and is a primary driver of project delays across the state.

One of the most time-consuming external processes is land acquisition. Before construction can start, IDOT must acquire all necessary right-of-way, a process that involves appraisals, negotiations, and, if necessary, legal proceedings. While IDOT handles initial negotiations, any acquisition requiring condemnation must be managed through the Attorney General's (AG) office. The current administrative thresholds that trigger this handoff are low, and the AG's office, facing its own capacity constraints, often has a backlog of cases. This legal process can add years to a project's timeline, creating a major bottleneck that is entirely outside of IDOT's direct control.

Coordination with utility companies and railroads represents another major source of project delays. The relocation of utilities—such as water mains, gas lines, and fiber optic cables—is a frequent requirement for roadway projects. This process involves lengthy negotiations with multiple private and public utility owners, each with their own engineering requirements and construction schedules. Similarly, projects that cross or run adjacent to railroad lines require complex agreements for construction, flagging, and insurance. Railroads, as private entities focused on their own freight and passenger operations, often have little incentive to prioritize IDOT's construction schedule, leading to protracted negotiations that can stall a project indefinitely.

Finally, the environmental review process, governed primarily by NEPA, introduces another layer of external dependency. While necessary to ensure environmental protection, the process requires extensive coordination with and approvals from multiple federal and State agencies, such as the U.S. Environmental Protection Agency, the U.S. Fish and Wildlife Service, and SHPO.

SHPO review, which involves identifying, evaluating, and mitigating impacts to historic properties and archaeological sites, can be particularly complex and time-consuming as projects often require extensive surveys, consultations, and the development of detailed mitigation plans, which can prolong timelines, especially when unforeseen discoveries are made. The primary difference in how Illinois manages its SHPO review process compared to other states lies in its structure and the extent of delegated authority. Most states utilize a single, integrated cultural resources unit to handle both archaeological and historic structure reviews, and many of these units are granted broad delegated authority to internally approve a wide range of projects without a formal SHPO review. In contrast, Illinois employs a unique dual-path system, formally splitting the responsibility between IDOT for

historic buildings and a separate state agency, the Illinois State Archaeological Survey, for all archaeological matters, which ensures deep expertise but creates a more complex, parallel process.

Even for projects that qualify for a Categorical Exclusion—the most streamlined level of NEPA review—the documentation and interagency consultation process can be lengthy. For larger projects requiring more detailed Environmental Assessments or Environmental Impact Statements, the timeline for securing final approval can span several years, often becoming one of the longest phases in project development.

Observation #19 | Increased Utilization of P3s and Alternative Delivery Methods Can Accelerate Delivery

While IDOT has the authority to use APD methods like P3s, the State's legislative framework is more restrictive than those in states with more mature and successful programs. These constraints create uncertainty and limit the agency's ability to leverage private sector innovation and capital to accelerate the delivery of major infrastructure projects.

A key constraint is the high degree of legislative oversight required by the Public-Private Partnerships for Transportation Act. The statute requires IDOT to secure a joint resolution from the ILGA to approve each P3 project *after* a preferred private partner has been selected. This practice introduces a late-stage political risk that can deter private investment and increase procurement costs. This is a major departure from the approach in states like Virginia, Florida, and Texas, where the state DOT has the authority to manage the entire procurement and execute final agreements without a project-by-project legislative vote.

Furthermore, the Illinois statute imposes quantitative limits not common in other states, restricting IDOT to initiating no more than two new P3 projects per year and having no more than six active procurements at any time. This contrasts with the more flexible frameworks in states like Colorado and Maryland, which allow their DOTs to pursue multiple P3 opportunities concurrently as they become viable.

As a result of these legislative and structural challenges, IDOT has underutilized the P3 model. Despite having statutory authority for over a decade, the agency has not yet completed a major P3 project. In contrast, states with more mature programs like Virginia and Florida have successfully used P3s to deliver billions of dollars in projects, including major highway expansions, express lanes, and bridges. This disparity suggests that Illinois is missing opportunities to accelerate project delivery and leverage private capital for its most critical infrastructure needs.

Observation #20 | Strengthening Industry Partnerships Can Improve Project Efficiency

The successful delivery of IDOT's capital program is fundamentally dependent on a strong and collaborative partnership with the external consulting and contracting industry. While IDOT and its industry partners share the common goal of delivering high-quality infrastructure for the State of Illinois, the BRC's analysis reveals opportunities to improve communication, transparency, and collaboration throughout the project lifecycle. Current processes for scoping, bidding, and managing projects can create inefficiencies and adversarial dynamics that lead to delays, change orders, and increased costs. Strengthening this partnership through greater transparency and more collaborative practices is essential for improving project delivery outcomes.

A key area for improvement is early-stage project scoping and procurement. Industry feedback indicates that the current process for developing project scopes and cost estimates often lacks sufficient input from the contractors and designers who will ultimately build the projects. This can lead to design documents that are not fully constructible or that contain unforeseen issues, resulting in a high number of change orders during construction. Similarly, the current bid timelines are often seen as too short for complex projects, giving contractors insufficient time to conduct thorough due diligence and develop accurate, competitive bids. More transparent and longer-range "look-ahead" schedules of upcoming projects will allow the industry to plan better for future work, allocate resources more effectively, and provide more competitive pricing.

The transition to digital design and delivery represents another critical area for enhanced collaboration. While IDOT is moving toward the use of 3D modeling and other digital tools, the industry's adoption and integration of these technologies vary. A more coordinated effort between IDOT and its partners to establish clear standards, provide training, and invest in interoperable systems is needed to fully realize the efficiency gains of a digital-first approach. This includes creating more streamlined processes for Request for Information (RFI) processing during construction, where digital tools can accelerate response times and reduce delays.

Finally, there is a clear need for more structured and consistent forums for collaboration. While IDOT does engage with industry through various associations and meetings, there is an opportunity to establish more frequent and formal collaboration events at both statewide and district levels. These events could serve as a platform for discussing upcoming programs, sharing best practices, addressing systemic challenges, and fostering a more proactive, partnership-oriented culture. By improving transparency around project pipelines, involving industry earlier in the scoping process, and creating dedicated channels for ongoing dialogue, IDOT can build a stronger, more collaborative relationship with its private sector partners, leading to more efficient and cost-effective project delivery.

Observation #21 — Adopting Active Program Management Can Optimize Project Delivery and Fund Utilization

IDOT's current program management practices limit its ability to strategically manage its project pipeline and maximize the impact of its historic funding levels. The Department's approach is largely reactive, focusing on tracking individual projects rather than actively managing the entire capital program as an integrated portfolio. This hinders long-range planning and prevents the Department from delivering projects in the most efficient manner, which is a contributing factor in the accumulation of large unspent cash balances.

A key structural issue is the practice of programming projects in the MYP without a consistent and transparent standard for "project readiness." As a result, the pipeline is not always populated with a sufficient number of shovel-ready projects. When programmed projects are delayed by external factors like utility or railroad issues, IDOT lacks a formal, transparent process for reallocating those funds to other projects that are ready to proceed. This inability to strategically shift resources contributes directly to the growth of unspent cash balances, even as critical infrastructure needs go unaddressed.

In contrast, leading state DOTs use Active Program Management to ensure that capital is always flowing to projects that are ready for construction. This proactive approach involves managing the entire capital program as a unified portfolio, using data and performance metrics to identify risks, optimize schedules, and reallocate resources to maintain momentum.

Several states have implemented robust systems to support this model:

- **Virginia:** VDOT provides public dashboards that offer real-time visibility into project performance by tracking milestones and issuing automated alerts for risks. The state's SMART SCALE funding process also includes specific cost-increase thresholds that trigger a project re-evaluation, ensuring financial discipline.
- **Texas:** TxDOT uses a public Project Tracker dashboard to provide real-time access to project milestones, funding status, and schedules. This transparency allows stakeholders to monitor progress and understand how transportation dollars are being invested.

By implementing a more proactive and strategic approach—establishing clear readiness standards as a condition of funding and creating a formal process to reallocate funds from delayed projects—IDOT could deliver investments more reliably, draw down its cash balance effectively, and ensure that taxpayer dollars are put to work as quickly as possible.

Recent Progress

In response to the challenges of delivering its historic capital program, IDOT has initiated several important reforms aimed at modernizing its processes and accelerating project delivery. These achievements demonstrate a commitment to addressing longstanding bottlenecks and aligning with leading practices.

Accelerating Environmental and External Reviews

IDOT has taken major steps to gain more control over project timelines. The Department has formally initiated the process to assume responsibility for environmental reviews under NEPA, a move that will reduce administrative delays. Additionally, IDOT has finalized an agreement with the U.S. Army Corps of Engineers (USACE) to provide dedicated staff for permit processing and has established a new programmatic agreement with the U.S. Fish and Wildlife Service to streamline reviews for bridge projects, both of which will expedite approvals.

Improving Program Management and Transparency

To enhance financial transparency, IDOT has launched a public-facing Cash Balances Dashboard and the Rebuild Illinois Accomplishments Dashboard[43], providing real-time data on fund balances and program achievements. To improve predictability for its partners, the agency is also developing a two-year look-ahead schedule for its contracting opportunities. Internally, the Department has begun the foundational work to create a unified Project Delivery Dashboard to standardize data and improve operational oversight.

Innovating Project Delivery and Management

IDOT is actively exploring and implementing new ways to deliver projects more efficiently. The agency has launched a $100 million Off-System Bridge Bundling Program to accelerate the replacement of 180 locally owned structures. Furthermore, IDOT is evaluating best practices from peer states to establish a dedicated Complex Projects Office, which will be responsible for managing "mega-projects" and those delivered through alternative methods, signaling a move toward incubating new tools and technologies to improve delivery for all projects.

Increasing Use of Alternative Delivery Methods

As part of its effort to adopt innovative delivery methods, IDOT is leveraging the CMGC model to advance the complex I-290 drainage project. This approach, which involves bringing the contractor on board during the design phase to provide input on constructability, cost, and innovation, marks a pivotal effort to manage risk and accelerate delivery on one of the Department's large-scale initiatives.

[43] Rebuild Illinois Accomplishments Dashboard

BRC Duty #7A:

Future Trends: Equity

Blue-Ribbon Commission Duty #7

Consider future trends that will impact the transportation system, including safety needs, racial equity, electric vehicles, and climate change

Background

The BRC focused on two key dimensions of equity in transportation: “industry equity”, which focuses on creating a level playing field for businesses, and “community equity”, which addresses how transportation decisions affect the public.

Industry Equity

Industry equity focuses on creating a level playing field so that all businesses have a fair opportunity to participate in the State's transportation program. In practice, this includes efforts to reduce barriers to participation and strengthen access for eligible small businesses, including firms that may qualify as socially and economically disadvantaged under federal Disadvantaged Business Enterprise (DBE) requirements.

DBE and BEP Programs:

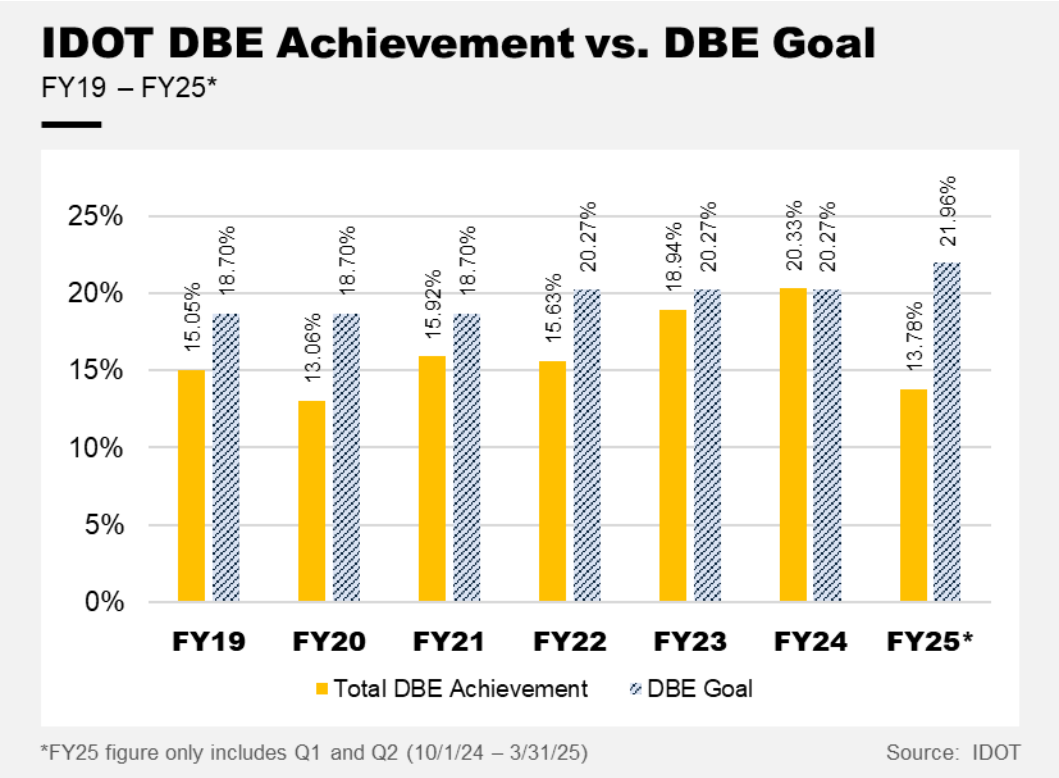
IDOT’s primary program for supporting fair participation in federally assisted transportation contracts is the DBE Program. This program applies to transportation projects that use USDOT funding and is intended to ensure that eligible small businesses owned and controlled by socially and economically disadvantaged individuals have a fair opportunity to compete for work. To participate, firms must be certified as DBEs through the official process. In Illinois, DBE certification is handled through the Illinois Unified Certification Program (IL UCP), which provides a single, statewide certification process so firms do not have to apply separately to each participating agency, and participating agencies can rely on one shared certification determination.

Separately, the State of Illinois administers the Business Enterprise Program (BEP) as a broader inclusion and supplier diversity initiative. BEP is not administered through the IL UCP, and it operates under a separate State process. In addition, BEP is not used on construction contracts, so it is not applied in the same way as the DBE Program on USDOT-funded transportation work.

In FY24, IDOT met its DBE goal across all contracts for the first time in five years. In FY25, IDOT was on pace to once again exceed its DBE goal; however, this positive trajectory was abruptly reversed by a sequence of federal court rulings and federal policy changes that created significant setbacks for the program.

The challenges began on September 23, 2024, with the court ruling in *Mid-America Milling Co., LLC v. U.S. Department of Transportation*. This decision challenged the use of group-based presumptions in DBE certification and immediately forced IDOT to remove contract goals upon a bidder's request. The impact was severe: through the first half of FY25, goals were removed from 451 contracts, triggering a $76 million decline in projected awards and suppressing the DBE achievement rate to just 13.78%.

The legal and policy pressure continued to mount throughout the year. In January 2025, Executive Orders 14151 and 14173 mandated a government-wide reassessment of all DEI-related programs, followed by an April directive from IDOT Secretary Sean Duffy affirming that programs based on "prohibited classifications" were legally suspect. The situation culminated on October 3, 2025, USDOT issued its Interim Final Rule (IFR). This new rule fundamentally reshaped the DBE program by requiring all firms to undergo an individualized recertification process, compelling IDOT to remove DBE goals from its November 2025 letting and pause DBE goal setting during the re-certification process, further hampering participation for the remainder of the fiscal year. For additional details on these challenges, see Observation #22.



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Supportive Services:

Small and diverse firms face systemic barriers that limit their ability to compete for and perform on IDOT contracts. These challenges primarily include:

- **Bonding and Insurance:** Prime contractors are typically required to secure performance and payment bonds for the full value of the contract, which can be prohibitively expensive or unattainable for smaller firms with limited financial history or collateral.
- **Access to Working Capital:** The reimbursement-based payment model used for most contracts creates a hurdle related to working capital. Contractors must have sufficient cash to cover upfront costs for labor, materials, and equipment, which can strain the financial resources of small businesses and limit their ability to take on larger projects.
- **Building a Track Record:** Many small and diverse firms struggle to build the project history and experience necessary to graduate from small subcontracts to larger, more profitable roles,

including serving as a prime contractor. This challenge is often exacerbated by a lack of mentorship and structured business development support.

- **Complex Bidding and Estimating:** Preparing competitive bids for large transportation projects is a highly specialized skill. Small firms often lack dedicated estimating staff and may struggle to accurately price complex work, putting them at a disadvantage against larger, more established companies.
- **Navigating Procurement and Compliance:** The administrative burden associated with State and federal contracting is substantial. Navigating the complex procurement process, understanding intricate policy requirements, and managing the extensive paperwork for compliance and payment can overwhelm small firms that often lack dedicated back-office staff.

IDOT has several supportive programs designed to mitigate challenges. These programs are intended to provide technical assistance, foster business development, and build a skilled workforce for the broader transportation industry.

The primary vehicle for direct business support is IDOT's Supportive Services program. Historically, this program has provided critical technical assistance to DBE/BEP firms to help them navigate the complexities of State contracting. These services have included workshops and one-on-one consulting on essential business functions such as:

- Developing accurate cost estimates and competitive bids.
- Understanding IDOT's plans, specifications, and project requirements.
- Navigating the DBE/BEP certification process.
- Managing project finances, payroll, and cash flow.
- Complying with State and federal reporting and documentation requirements.

Building a skilled and diverse labor pool is another critical component of industry equity, as both IDOT and its contractor partners rely on a ready supply of trained workers. IDOT is involved in several key workforce development initiatives:

- **Highway Construction Careers Training Program:** This statewide program, administered through community colleges, provides intensive pre-apprenticeship training to prepare women, minorities, and disadvantaged individuals for careers in the skilled construction trades.
- **Illinois Works:** Tied to the Rebuild Illinois capital plan, this program establishes apprenticeship goals on all State-funded public works projects, creating a direct pathway for new workers to gain on-the-job training and enter the transportation workforce.

Community Equity

Community equity addresses how transportation planning, investment, and operations impact the public. A core principle of community equity is ensuring that the benefits of the transportation system—such as improved access to jobs, healthcare, and education—are distributed fairly, and that the burdens, such as noise, pollution, and displacement, do not fall disproportionately on historically underserved or marginalized communities. This requires a proactive approach to investment, engagement, and environmental review that seeks to not only avoid future harm but also to address the lingering effects of past infrastructure decisions.

Community Engagement

IDOT's primary mechanism for engaging with the public is through its formal public involvement process, which is a required component of project development, particularly for projects receiving federal funds. This process typically includes public meetings, formal hearings, and public comment periods, which are designed to provide a forum for residents and stakeholders to provide input on proposed projects. This process is essential for meeting federal requirements and ensuring a baseline level of transparency.

Community Investment

IDOT's capital program is the primary vehicle for delivering the benefits of transportation investment to communities across the State. Through the projects programmed in the MYP, IDOT makes investments aimed at improving safety, reducing congestion, and enhancing mobility. The decisions on which projects to fund and prioritize are primarily driven by a set of data-driven technical criteria that are focused on the engineering and operational needs of the transportation system. These criteria typically include:

- **Asset Condition:** The physical condition of a road or bridge is a primary factor. Projects are often prioritized based on pavement quality ratings, bridge inspection reports, and other measures of deterioration to address the system's state of good repair.
- **Safety Performance:** IDOT uses crash data and safety analysis to identify and prioritize locations with a high incidence of accidents, funding projects designed to reduce fatalities and serious injuries.
- **Traffic Volumes and Congestion:** Data on traffic volumes, travel times, and levels of congestion are used to identify bottlenecks and prioritize projects that will improve the efficiency and reliability of the system.
- **Operational Needs:** This includes projects necessary for the day-to-day functioning of the transportation network, such as replacing outdated equipment or modernizing traffic signal systems.

While these technical criteria are essential for maintaining a safe and functional transportation system, the BRC's analysis found that IDOT's project selection process has not historically included a formal or consistent framework for evaluating how investments align with broader community equity goals, such as addressing historical disinvestment or improving access for underserved populations.

Environmental Justice and Impact Mitigation

A core principle of community equity is ensuring that the benefits of the transportation system are distributed fairly and that its burdens do not fall disproportionately on historically underserved communities. This requires a proactive approach to investment and environmental review that not only avoids future harm but also addresses historical inequities and prepares for future challenges.

Environmental Justice (EJ) is a foundational component of this, rooted in the federal requirement to prevent discrimination in programs receiving federal funds. For IDOT, this means analyzing whether its projects will have "disproportionately high and adverse effects" on minority and low-income populations, a formal requirement of the NEPA process. While this compliance-driven process is in place to identify

and mitigate impacts like pollution and displacement, the BRC identified opportunities for a more strategic framework that proactively addresses community needs.

Two emerging areas are critical to the future of community equity: the transition to EVs and climate resilience. While electrification advances environmental goals, an equity-minded approach is needed to ensure that new user-fee models are fair to all income levels and that EV charging infrastructure is not concentrated in already advantaged areas.

Similarly, climate resilience is an urgent equity issue, as extreme weather events disproportionately impact vulnerable neighborhoods. An equitable strategy prioritizes resilience investments in the areas of greatest need by pairing projects with place-based hardship criteria. By then applying race-neutral, size-based contracting tools, IDOT can ensure that firms closest to the work have a clear pathway to participate, building local capacity and speeding recovery in the communities that need it most.

BRC Observations

The BRC's analysis of equity revealed a system at a critical inflection point. While IDOT has foundational programs in place to support both industry equity for small and diverse businesses and community equity for underserved populations, these efforts are facing challenges.

On the industry side, recent federal policy shifts and legal challenges have created profound uncertainty for the federal DBE program, threatening to roll back progress and reduce opportunities for diverse firms. This is compounded by the fact that IDOT's existing supportive services for small businesses are fragmented, under-resourced, and lack key financial assistance programs to address systemic barriers like bonding and access to capital.

On the community side, the BRC found that IDOT's current framework for making transportation investments lacks a formal, data-driven methodology to integrate equity into its project selection process. While peer states are increasingly using equity as a core criterion to guide investments, IDOT's process remains primarily focused on technical and engineering needs. This represents a missed opportunity to leverage the State's historic capital program to address historical disinvestment and create a more equitable transportation system for all Illinois residents

Observation #22 **Federal Policies and Legal Challenges Threaten DBE Program:**

Throughout 2025, a series of federal executive orders, a legal injunction, and new federal rulemaking have fundamentally disrupted IDOT's administration of the federal DBE program. These developments have challenged the long-standing legal framework for the program, forcing IDOT to pause or restructure key equity initiatives and creating uncertainty for both the Department and the small and diverse businesses it serves. While race-neutral programs like the Small Business Initiative (SBI) exist, they have not been consistently utilized and are not structured to address the systemic, race- and gender-based disparities that the DBE program was designed to remedy.

Evolving Policy and Legal Landscape

On September 23, 2024, the federal court ruling in *Mid-America Milling Co., LLC v. U.S. Department of Transportation* directly challenged the use of race- and gender-based presumptions in the DBE certification process. In response to this injunction, IDOT was forced to adopt a new procedure where, upon notification from a specific contractor of their intent to bid, the Department had to remove DBE contract goals from that project. This practice, which was in effect until the subsequent federal rule was issued, resulted in the removal of DBE goals from 22 IDOT contracts, reducing opportunities for diverse firms on those projects.

In January 2025, the issuance of Executive Orders 14151 and 14173, mandated a government-wide reassessment of all programs related to diversity, equity, and inclusion (DEI). These orders directed federal agencies to terminate any policies deemed to create unlawful preferences, placing a new emphasis on race- and gender-neutral program administration.

In April 2025, IDOT Secretary Sean Duffy issued a letter clarifying the Department's position, stating that any program "premised on a prohibited classification...presumptively violates Federal law." This directive signaled a shift toward ensuring all equity programs were legally defensible.

The legal landscape continued to evolve with the issuance of UDOT's IFR on October 3, 2025. This rule reshaped the DBE program by requiring individualized evidence of social and economic disadvantages, rather than relying on group-based presumptions, and triggered a broad recertification process for all currently certified DBE firms.

Impacts on IDOT and the Small Business Community

These rapid changes have had a profound impact on both IDOT and the small business community. For IDOT, the uncertainty has led to the pausing of other equity-focused programs, such as the Mentor-Protégé Program and the Small Business Initiative, as the Department re-evaluates its legal framework. The removal of DBE goals on specific contracts has also slowed procurement processes, contributing to project delivery delays. The increased legal scrutiny and the new requirements of the IFR now demand a restructuring of the DBE program to maintain federal compliance, placing a greater reliance on race-neutral strategies that may not be sufficient to address long-standing systemic disparities.

For the small business community, the impacts have been even more direct. The uncertainty around DBE goals and the new recertification requirements have reduced participation by small businesses, as many firms are unsure about their future eligibility for DBE credit. Minority-, women-, and veteran-owned firms have been disproportionately affected by this rollback of established program protections. Furthermore, the disruption has led to reduced engagement from prime contractors in outreach and partnership-building with diverse firms. This has resulted in a loss of predictable contracting opportunities, severely limiting the ability of small firms to plan, invest, and grow their businesses.

Potential Programs to Supplement the DBE Program

As the legal and regulatory landscape for the DBE program continues to evolve, many state transportation agencies are turning to race- and gender-neutral, economically focused tools to ensure that participation from small and diverse firms does not stall. During this transitional period, as the new requirements of the federal IFR are implemented and the DBE program is recertified, Illinois has an opportunity to establish parallel, neutral pathways that create predictable opportunities for these businesses.

Across the country, leading DOTs are linking Small Business Enterprise (SBE) certifications to SBI contracting tools and using place-based designations such as Economically Disadvantaged Areas (EDAs) to identify and support emerging or underserved firms. These mechanisms create clear, size-based pathways into right-sized work, which can stabilize contracting opportunities during the IFR recertification period. Crucially, these race-neutral tools are designed to complement, not replace, the DBE program. By establishing a statewide SBE credential, building consistent SBE-to-SBI pathways, and deploying EDA-focused contracting tools, Illinois can reduce the administrative burden on both the State and small businesses, prevent a stall in diverse firm participation, and ensure that projects are supplied with a deeper bench of ready contractors while the long-term future of the DBE program is determined.

Small Business Enterprise Certification:

An SBE credential formally confirms that a firm meets objective size and independence standards (for example, revenue and employee thresholds) and is independently owned and operated. It signals eligibility for small-business preferences or set-asides, opening access to prime and subcontracting opportunities on public projects. In practice, SBE is a race- and gender-neutral mechanism that diversifies the vendor base and strengthens local economies without relying on protected-class presumptions.

Illinois does not yet have a statewide SBE certification. Under the IFR, recipients have paused setting new DBE contract goals and are not counting DBE participation toward goals until eligibility is re-confirmed, creating short-term uncertainty for firms pursuing federally assisted work. The State's BEP remains in place; however, it is not a fully race-neutral, size-based credential that small businesses can use uniformly across agencies and funding streams. As a result, many otherwise qualified firms face additional administrative burdens and hesitation to bid while the IFR transition continues.

Several state DOTs offer useful models Illinois can adapt, featuring clear size thresholds, streamlined applications, and interagency reciprocity, so that once firms are certified, they can reliably access right-sized opportunities through coordinated small-business tools. Implementing a comparable approach in Illinois now will maintain inclusive access during the IFR transition and complement DBE once recertification is complete. For example:

- **Texas:** TxDOT's SBE Program applies to state- or locally funded highway contracts and relies on SBA size standards for firm eligibility, providing an additional channel for small businesses to secure work with the department. Certifications are valid for three years and integrated through Texas's Unified Certification Program.

- **North Carolina:** NCDOT operates an SBE Program with strict revenue caps, generally limiting eligibility to firms with no more than $1.5 million in gross receipts (excluding materials). To strengthen access, NCDOT also unbundles contracts and provides targeted outreach and

training. This approach ensures that the smallest firms have meaningful entry points into the state's transportation contracting opportunities.

- **Ohio:** ODOT has implemented a race- and gender-neutral SBE program that sets aside certain federally funded highway contracts for small businesses. This allows firms that may not qualify as DBEs to build performance history in the transportation sector while competing in a smaller pool. The program creates a parallel pathway for growth outside of the DBE framework.

In Illinois, data highlights the need for a more structured, race-neutral approach to small business participation. While IDOT's total construction expenditures have risen sharply—from approximately $1.7 billion in FY2018 to over $3.1 billion in FY2024—the share of work going to small businesses has fluctuated, dipping as low as 10% in FY2023. Although participation rebounded to 14.5% in FY2024, it still lags previous highs of nearly 19%.

Figure 7: IDOT Small Business Spend on State-Funded Contracts (2018–2024)[44]

FY	Total IDOT Construction Spend	$ to Small Businesses	*Small Business Share of Total Const. Spend*
2018	$1,730,000,000	$327,200,000	*18.9%*
2019	$1,680,000,000	$312,200,000	*18.6%*
2020	$1,976,013,539	$309,040,659	*15.6%*
2021	$1,770,189,253	$287,531,088	*16.2%*
2022	$2,157,183,407	$252,673,391	*11.7%*
2023	$2,346,864,495	$234,014,976	*10.0%*
2024	$3,131,349,341	$455,030,646	*14.5%*

This volatility is now amplified by recent changes to the federal DBE program. The new DBE IFR requires a widespread re-evaluation of all certified firms. As a result, IDOT and other agencies have paused setting new DBE contract goals and are not counting participation until a firm's eligibility is re-confirmed. This injects considerable uncertainty into the project pipeline and discourages otherwise qualified small firms from bidding on federally assisted work.

Together, these dynamics underscore the need for a robust, standardized, race-neutral, size-based contracting framework. Pairing a clear SBE certification with a dedicated SBI for contracting stabilizes access and ensures that small firms can consistently compete for IDOT contracts, regardless of funding source or shifts in federal regulations.

Small Business Initiative):

IDOT's SBI sets aside select, lower-value highway construction projects for competition among qualified small firms, allowing emerging contractors to build experience, references, and capacity while broadening participation on State-funded work. By limiting head-to-head competition with much larger contractors and right-sizing scopes to the capabilities of smaller firms, SBI supports business growth,

[44] Overall Disadvantaged Business Enterprise Triennial Goal for the Federal Highway Administration

fosters a more inclusive contracting environment, and creates a practical pathway for firms to progress to larger contracts over time.

Today, SBI applies only to State-funded projects, which leaves a gap in federally assisted work and reduces consistency for small firms during the DBE IFR transition. In addition, SBI does not yet anchor eligibility in a uniform, statewide SBE standard, and practices can vary by district without a formal certification process or consistent documentation and implementation.

Strengthening SBI aligns with Illinois' shift to race- and gender-neutral, economically based tools. Tying SBI eligibility to a statewide SBE credential, standardizing forms and checklists, providing clear district guidance, and adding supportive services such as navigation help, bonding and insurance readiness, and partner-led capital pathways makes the program predictable and easier to use. Where permissible, Illinois can also explore applying SBI-style tools on federally funded projects to provide a single, coherent experience for small firms.

Peer agencies offer proven models for a more effective, race-neutral approach. Both the Illinois Tollway and the Michigan Department of Transportation (MDOT) operate successful size-based programs that feature clearly defined eligibility thresholds, streamlined applications, and robust supportive services.

In contrast, IDOT's own SBI has been applied less consistently, its eligibility criteria have been less clearly defined, and its support for firms has been more limited. Adopting a standardized, statewide SBE certification and aligning the SBI program with the best practices of these peer agencies closes these gaps, creating a more predictable and accessible pathway for small businesses to compete for and win contracts.

Figure 8: Small-Business Contracting Frameworks Comparison

Agency	Scope & Eligibility	Set-Aside Structure	Administrative Framework	Support Services	Strategic Integration
IDOT	Small businesses with < $14 million annual revenue; state-funded set-asides	Inconsistent application across projects	Lacks formal structure and transparency	Minimal support or development resources	Not integrated into strategy and goal setting
Illinois Tollway	Small businesses with < $14 million annual revenue	Reserves select construction contracts exclusively for SBI-registered small businesses	Robust application system with technical assistance and liability insurance coverage (ROCIP)	Strong support including mentorship (Partnering for Growth), business development, and bid credits	Typically reserves contracts under $5 million for SBI
Michigan DOT	SBA size standards with additional personal net worth limits; DBE firms may also qualify	Formal set-asides for construction ≤ $1 million and consulting ≤ $250,000, with geographic and eligibility checks	Requires eligibility documentation, annual verification, and a formal application process	Moderate support including outreach, contract unbundling, and federal alignment	Functions as a race-neutral overlay to the DBE framework for federal compliance
Caltrans	Recognizes Department of General Services (DGS)-certified Small Businesses	Uses SB participation goals and id preferences rather than blanket set-asides	Administered via Cal eProcure/ DGS w/Caltrans posting contract-level SB goals	Provides district, outreach, certification/workshops, and small-business councils	Requires 25% small business participation and 5% on state-funded contracts

Economic Development Areas:

EDAs are one potential approach for linking transportation investments with broader community and economic goals. A geographically targeted strategy can expand small-business participation, workforce training, and pre-apprenticeship pathways while keeping a clear focus on mobility and infrastructure. Because EDAs use objective geographic and economic indicators (for example, poverty and unemployment rates) rather than presumptive class, they provide a race-neutral, legally durable way to advance equitable access under the DBE IFR's framework. At the same time, EDAs should be viewed as one option among several that IDOT could evaluate alongside other race-neutral strategies to determine the most effective and feasible path forward.

Peer agencies, including TxDOT, Caltrans, and MDOT already deploy location- and economics-based contracting programs that offer proven models for IDOT.

- **Texas:** TxDOT administers the Economically Disadvantaged Counties (EDC) Program, which adjusts local match requirements for federally funded projects in counties identified by per capita income, unemployment, and tax base. Codified in state law, the program enables greater participation by rural and under-resourced communities.
- **Maryland:** MDOT leverages federal Opportunity Zones and state-defined Equity Zones to shape contracting goals and deliver supportive services. This framework provides a race-neutral, geography-based method of advancing equity in transportation investment.
- **Michigan:** MDOT piloted Targeted Business Development Areas using economic and demographic data to guide implementation. The pilot emphasized DBE and SBE training, technical assistance, and contracting access in economically distressed regions, offering a race-neutral inclusion strategy developed in response to affirmative action limits.

EDAs can be evaluated alongside other race-neutral options, such as expanded supportive services, refined goal setting and monitoring processes, and targeted technical assistance, to identify the approach or combination of approaches that best fits IDOT's goals and operational capacity.

Observation #23 | IDOT's Supportive Services for Small Businesses Trail Leading Practice

IDOT's current framework of supportive services for small businesses, while well-intentioned, trails leading practices in other states, thereby limiting the participation and growth of small and emerging enterprises in public contracting. These gaps are particularly evident in critical areas such as financial assistance, bonding, mentorship, and targeted outreach.

- **Limited Financial and Bonding Assistance:** IDOT currently lacks a centralized program to address critical barriers like access to working capital and affordable bonding. This absence leaves many firms struggling with upfront expenses, cash flow gaps, or high bonding premiums, all of which hinder their ability to compete and grow. In contrast, peer agencies like TxDOT and Maryland DOT employ targeted financial tools, such as revolving loan funds, reduced local match requirements, or bonding assistance programs, to boost small business participation. The Illinois Tollway's Rolling Owner Controlled Insurance Program (ROCIP) also offers a successful in-state example of centralizing liability coverage to reduce costs for small firms.

- **Inactive and Limited Mentorship Program:** IDOT's Mentor-Protégé Program, designed to pair prime contractors with certified DBEs or SBEs, is currently inactive due to federal mandates and constitutional guidelines. When active, its scope was limited exclusively to DBE construction contracts, lacked a race- and gender-neutral structure, and offered fewer incentives compared to more robust programs in states like Texas, Florida, California, and Michigan. These leading programs typically offer broader eligibility, stronger incentives, and more comprehensive business development support.
- **Fragmented and Inconsistent Outreach:** IDOT's current outreach primarily focuses on certified DBE firms in the construction sector through certification efforts, procurement bulletins, and vendor fairs, with most activity concentrated in urban areas. However, this project-driven and decentralized approach does not provide the sustained, targeted engagement small businesses require. As a result, rural businesses often lack awareness of IDOT opportunities, non-DBE small businesses lack a comparable race-neutral pathway, and firms outside construction (e.g., professional services, IT) receive little targeted outreach. Peer examples from Texas, California, and Maryland demonstrate that proactive, regionally segmented outreach, including multilingual materials and local partnerships, boosts small business participation across a broader spectrum of firms.

The Commission concludes that IDOT's existing supportive services remain fragmented, causing many small and emerging firms to struggle with fundamental aspects of public contracting. Modernizing these programs by reactivating and improving the Mentor-Protégé Program, establishing accessible working-capital and bonding assistance, and expanding outreach beyond DBE-focused efforts aligns IDOT with leading practices and broadens the vendor base for both State and federally funded projects.

Observation #24 — There is an Opportunity to Better Integrate Equity into IDOT's Investment Decisions

While IDOT's project selection process is guided by a range of data-driven, technical criteria, there is no formal, statewide framework for integrating community equity into its investment decisions. The current process for prioritizing projects in the MYP is primarily focused on asset conditions, safety performance, and congestion. While essential for system maintenance, these metrics do not systematically account for how an investment might address historical disinvestment or improve access for underserved populations. This represents a missed opportunity to leverage the State's historic capital program to advance broader goals of social and economic equity.

Without a standardized set of equity criteria, IDOT's investment decisions are not consistently structured to identify and prioritize projects that could have the greatest positive impact on disadvantaged communities. The current framework lacks the tools to evaluate and compare projects based on their potential to improve quality of life, connect people to jobs, or reduce transportation cost burdens. This can lead to a capital program that, while technically sound, may inadvertently perpetuate existing inequities or fail to direct resources to the communities where they are needed most.

In contrast, several peer state DOTs have formally integrated equity into their project selection processes, providing potential models for Illinois:

- **California (Caltrans):** Has developed a "Climate, Health, and Equity" framework that requires all major projects to be evaluated based on their impact on disadvantaged communities, using metrics that measure access to services and transportation affordability.

- **Washington State (WSDOT):** Uses a data-driven "Equity Index" to identify areas with high concentrations of underserved populations and prioritizes funding for projects that reconnect and improve mobility in those communities.

- **Michigan (MDOT):** Has integrated equity into its long-range plan, establishing specific performance measures related to providing equitable transportation access for all users.

These examples demonstrate a national trend toward a more holistic approach to transportation investment. By developing and implementing a similar strategic framework, IDOT could ensure that its historic capital program not only improves the state's physical infrastructure but also contributes to a more equitable and prosperous future for all Illinois residents.

Observation #25 — IDOT has Opportunities to Establish More Robust Community Impact Support

While IDOT adheres to the formal requirements for EJ analysis, the Department's current approach is primarily a compliance-driven exercise rather than a proactive, strategic framework for advancing community equity. The current process is effective at identifying potential adverse impacts but does not consistently translate analysis into tangible community benefits or prioritize resilience in vulnerable communities. This limits IDOT's ability to use its capital program to address historical inequities and build a more just and resilient transportation system.

- **Lack of Proactive Community Enhancement and Restorative Justice Initiatives:** IDOT's current process focuses on ensuring that a project does not create a "disproportionately high and adverse effect" on underserved populations. However, it does not typically require the Department to proactively identify or fund "Community Enhancement" or "Restorative Justice" projects that could actively improve conditions. This contrasts with leading states like Washington (WSDOT), whose "Connecting Communities" initiative specifically funds projects designed to reconnect neighborhoods previously divided by highways, and the Minnesota Department of Transportation (MnDOT), which has piloted projects that co-create community-led solutions to address historical infrastructure impacts.
- **Absence of Formal Accountability for Community Resilience:** While planning may identify that a particular community is highly vulnerable to climate risks like flooding or extreme heat, there is no formal mechanism to ensure that resilience improvements are prioritized in these specific areas. Investment decisions remain primarily driven by asset condition data, without formal weighting for community vulnerability. Peer states are beginning to address this by more explicitly linking equity and resilience. The Maryland Department of Transportation, for example, uses a "Climate Justice Screening Tool" that overlays maps of climate risk with demographic data to identify and prioritize projects in the state's most vulnerable communities.
- **Limited Technical Support for Local Agencies on Climate Initiatives:** IDOT provides limited technical support to help LPAs, particularly smaller municipalities, integrate climate mitigation and adaptation measures into their projects. These agencies often lack the in-house expertise to design climate-resilient infrastructure (e.g., permeable pavements) or plan for climate mitigation projects (e.g., EV charging networks). While IDOT's district offices provide general project guidance, there is no centralized program offering dedicated technical assistance or targeted funding in these critical areas, in contrast to states like California (Caltrans), which provides specific grants and hands-on support to local partners for sustainable transportation projects.

Recent Progress

IDOT has advanced equity in its contracting processes by initiating collaborative meetings with the Illinois Tollway and the City of Chicago to establish consistent, statewide criteria for SBE certification and to clarify eligibility for the SBI. The Department has also convened stakeholders to explore establishing EDAs to better direct infrastructure investments. In response to recent changes in federal regulations, IDOT has launched a "rapid response" public outreach campaign to help current DBE firms navigate the new certification review requirements under the federal IFR, with the goal of re-confirming eligibility for firms participating in upcoming federally assisted contract letting.

BRC Duty #7B:

Future Trends: Environmental Sustainability

Blue-Ribbon Commission Duty #7

Consider future trends that will impact the transportation system, including safety needs, racial equity, electric vehicles, and climate change

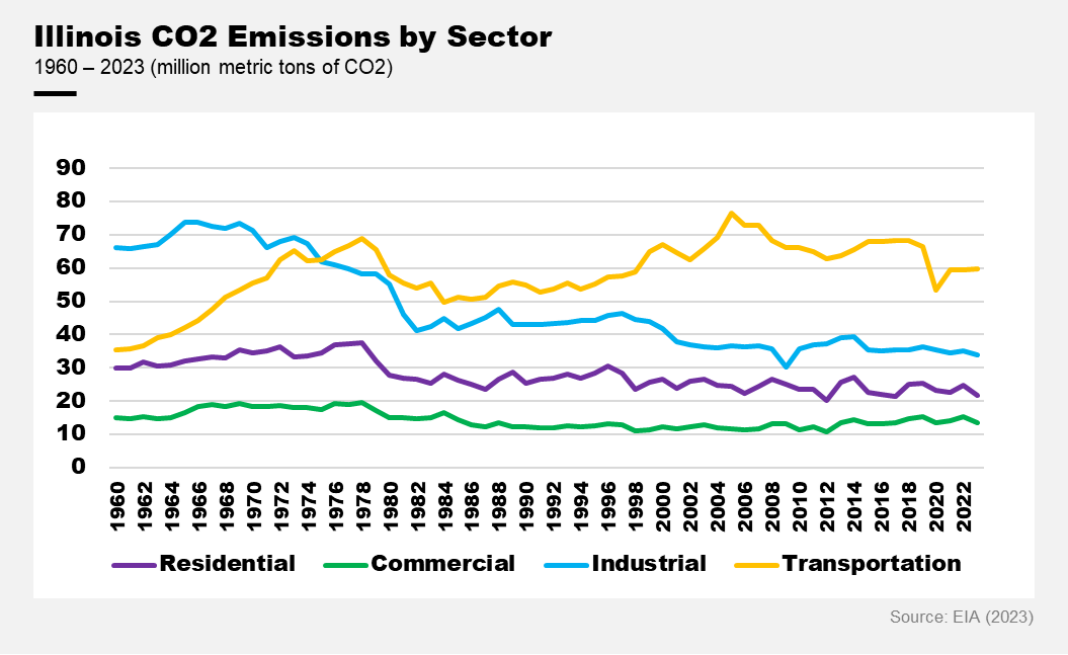
Background

Environmental sustainability in transportation is a comprehensive approach to planning, building, and operating the system in a way that minimizes its negative impact on the natural world while ensuring it can withstand future environmental challenges. For IDOT, this means addressing the impacts of climate change and ensuring that its actions promote equity.

The transportation sector is a primary driver of greenhouse gas (GHG) emissions and simultaneously increasingly vulnerable to climate consequences like extreme weather, which disproportionately affect historically underserved communities. Therefore, a comprehensive sustainability strategy must pursue three parallel objectives: climate mitigation to reduce the sector's environmental footprint, climate adaptation to build a more resilient infrastructure network, and community resilience to ensure that all communities, particularly the most vulnerable, benefit from a safer, cleaner, and more resilient transportation future.

Climate Mitigation

Climate mitigation aims to reduce the transportation sector's contribution to climate change by lowering its GHG emissions. In Illinois, the transportation sector is the single largest source of CO2 emissions, currently accounting for approximately 33% of the state's total emissions. The primary source is road vehicles, underscoring the urgent need for a long-term decarbonization strategy.



The State of Illinois has established a broad policy foundation for addressing climate change, though it has not yet set a specific GHG emissions reduction target for the transportation sector. Key initiatives include:

- Executive Order 2019-06: Committed Illinois to the principles of the Paris Climate Agreement.
- Climate and Equitable Jobs Act (CEJA): Set an ambitious goal of having one million EVs on Illinois roads by 2030 and created incentives and funding to build out a statewide charging network.
- Comprehensive Climate Action Plan (C-CAP): Currently in development, this plan will provide a roadmap for future mitigation efforts across all sectors.

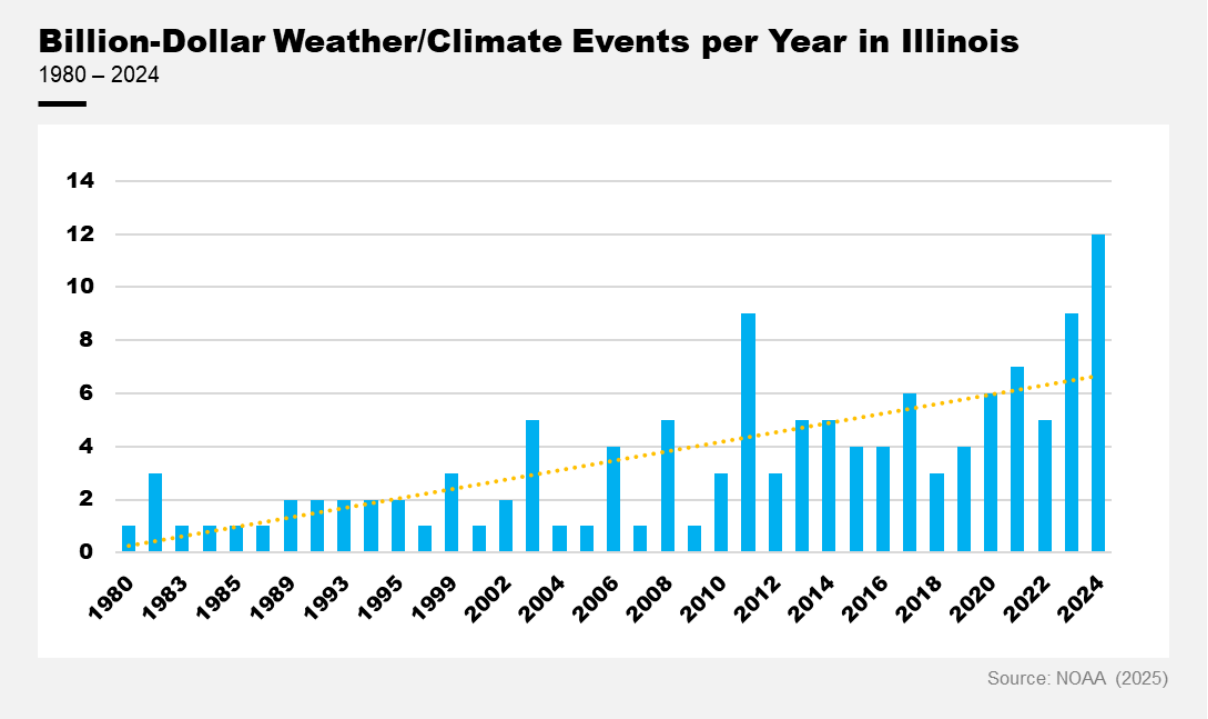
While these initiatives are important, they focus on specific outcomes (e.g., the number of EVs) rather than establishing a comprehensive, binding GHG emissions reduction goal for the entire transportation sector.

Within this State-level framework, IDOT's climate mitigation efforts are primarily focused on implementing programs that support the transition to cleaner transportation and reduce vehicle miles traveled (VMT).

- EV Charging Infrastructure: IDOT's most direct role is administering the state's EV charging infrastructure program. Using federal (NEVI) and state (i.e., CEJA) funds, IDOT is overseeing the deployment of a network of fast-charging stations along key highway corridors.
- Investing in Multimodal Transportation: Through its capital program, IDOT funds projects that support public transit, expand the statewide passenger rail network, and invest in bicycle and pedestrian infrastructure to provide sustainable alternatives to single-occupancy vehicle travel.
- I-LAST Rating System: IDOT uses the Illinois Livable and Sustainable Transportation (I-LAST) rating system to encourage the integration of sustainability principles into its projects. This scorecard-style tool evaluates projects against a range of criteria—including environmental, economic, and social factors—and awards certifications (e.g., Bronze, Silver, Gold) based on performance, providing a structured framework for a more holistic approach to project design.

Climate Adaptation

Climate adaptation focuses on making transportation infrastructure and systems resilient to climate risks. In Illinois, these risks are substantial and growing. Over the past 120 years, annual precipitation has increased, and all 102 Illinois counties have experienced flooding severe enough to warrant a Presidential Disaster Declaration. This increased flooding, along with fluctuating Great Lakes water levels, threatens to damage highways, bridges, rail lines, and ports, creating disruptions to travel and commerce.



In addition to flooding, the state's transportation network is also vulnerable to a range of other climate-related hazards. Extreme heat events, which are becoming more frequent and intense, can cause pavement to buckle and rail tracks to deform, creating safety risks. These high temperatures also have a direct impact on the transportation workforce, increasing the risk of heat-related illness for maintenance crews and construction workers who must perform physically demanding tasks outdoors. At the same time, more frequent and intense storms can lead to widespread power outages that disrupt traffic signal systems and cause direct damage to infrastructure from high winds and debris. These events not only pose a direct threat to public safety but also place an immense financial and operational strain on the system, increasing the costs of emergency response and repair while placing greater demands on an already capacity-constrained workforce.

To address these vulnerabilities, states are increasingly focusing on:

- **Improved Risk Assessment and Planning:** This focuses on integrating climate change considerations into all stages of transportation planning. It involves conducting formal, statewide vulnerability assessments to identify the assets most at risk from flooding and extreme heat and then using future climate projections to inform long-range transportation plans. This data-driven approach allows for the strategic prioritization of investments, ensuring that resources are targeted to the most vulnerable communities and infrastructure.

- **Climate-Resilient Infrastructure Design:** This strategy involves proactively engineering and constructing assets to withstand future climate risks. Examples include elevating roads and bridges in flood-prone areas, using more durable and heat-resistant materials for pavement and rail tracks, and incorporating "nature-based solutions" like green infrastructure to better manage stormwater. These measures are designed not just to repair existing assets but to rebuild them to a higher standard of resilience.

- **Emergency Preparedness and Redundancy:** This strategy aims to strengthen the transportation system's ability to respond to and recover from extreme weather events. This

includes identifying and hardening critical evacuation routes, investing in real-time traffic management and traveler information systems, and building backup systems for critical functions like power for traffic signals and communication networks to ensure a reliable and functioning network during disruptions.

IDOT's current climate adaptation efforts are primarily integrated into its standard engineering and maintenance practices on a project-by-project basis, rather than being driven by a formal, standalone climate resilience program. While IDOT has begun to incorporate more explicit resilience considerations into some major projects, these actions are not yet part of a comprehensive, proactive strategy. A comprehensive, proactive approach includes updating the 2017 All-Hazards Transportation System Vulnerability Assessment to identify current transportation assets most at risk.

BRC Observations

The BRC's analysis of IDOT's approach to environmental sustainability reveals that while the Department has several important initiatives underway, it currently lacks a comprehensive, updated statewide strategic framework and updated all hazards vulnerability assessment to guide its efforts. This is a critical gap, as the transportation sector is the primary driver of the state's greenhouse gas emissions and is increasingly vulnerable to the impacts of climate change. This represents an opportunity for IDOT to take a leadership role in advancing the State's climate goals and building a more resilient and sustainable transportation system.

Observation #26	IDOT has Gaps in Foundational Components Needed for a Leading Sustainability Program

While IDOT has taken positive steps to incorporate sustainability into its operations, the Department currently lacks several foundational components of a comprehensive, strategic, and statewide sustainability program. This is evidenced by a limited number of dedicated staff, the absence of specific and measurable goals, an outdated definition of sustainability, and a reliance on ad-hoc funding sources. This contrasts with the more mature and integrated programs established by peer state DOTs, which have created robust frameworks to drive progress on both climate mitigation and adaptation.

Staffing: A primary gap is the limited number of staff at IDOT dedicated to sustainability. Currently, there is no centralized team with the sole responsibility of developing, implementing, and monitoring a statewide sustainability strategy. Instead, these duties are often distributed among various bureaus and managed as ancillary responsibility by staff with other primary roles. This lack of dedicated leadership and expertise hinders the Department's ability to develop a cohesive strategy, coordinate efforts across its nine districts.

Goal Setting: This is compounded by the fact that there are no statewide or department-specific goals for sustainability, particularly for GHG emissions reduction. While the State has a goal of reaching one million electric vehicles by 2030, there is no overarching target for reducing total emissions from the transportation sector. This is a departure from many peer states, which have established clear, legislatively mandated goals:

- **California:** Aims to reduce GHG emissions to 40% below 1990 levels by 2030.
- **Washington:** Has a target of reducing GHG emissions to 45% below 1990 levels by 2030.
- **Colorado:** Has a goal of a 50% reduction in GHG emissions from 2005 levels by 2030.

Definition: IDOT's current definition of sustainability—"meeting the needs of the present generation without compromising the ability of future generations to meet their own"—is a broad and widely accepted principle first articulated by the United Nations' Brundtland Commission in 1987. While this definition has served as a foundational concept for decades, it is a very general statement that lacks the specific, actionable components that are increasingly common in the definitions used by peer DOTs today. For example, Caltrans defines sustainability as a "triple bottom line" that explicitly balances environmental, social, and economic goals. Similarly, WSDOT has adopted a "Moving Washington" framework that integrates sustainability with specific objectives for environmental health, social equity, and economic vitality. These more detailed and modern definitions provide a clearer strategic direction and a more holistic framework for decision-making than IDOT's current, more generalist statement, which does not reflect the current leading practices in the transportation industry.

Funding: Finally, IDOT's funding for sustainability initiatives is largely dependent on ad-hoc, project-specific, or federal grant funding rather than a dedicated, recurring state funding stream. While the Department has successfully utilized federal programs like the NEVI program to fund EV charging infrastructure, there is no consistent, long-term State funding source specifically for climate mitigation, adaptation, resilience projects, or other sustainability initiatives. This makes it difficult to engage in long-range planning and creates uncertainty about the State's ability to fund critical resilience and mitigation projects in the future.

Observation #27 — There are Opportunities to Expand IDOT's Portfolio of Climate Mitigation Strategies

A comprehensive mitigation portfolio typically includes strategies that address emissions from all aspects of the transportation lifecycle, from construction to daily use. Key strategies being implemented by peer states include:

- **Low-Carbon Materials:** A growing number of states are actively promoting the use of low-carbon and recycled materials in their construction projects. Caltrans, for example, has established specifications and incentives for the use of recycled asphalt and concrete, as well as innovative, lower-carbon cement alternatives. IDOT currently lacks a formal, statewide program to incentivize or require the use of these materials, representing a missed opportunity to reduce the "embodied carbon" in its infrastructure projects.

- **EV Charging Infrastructure:** While IDOT is successfully administering the build-out of a federally funded fast-charging network along major highway corridors, peer states like Colorado and Washington have gone further by creating state-funded grant programs that support the installation of Level 2 chargers at workplaces, multi-family housing units, and public destinations. This "last-mile" charging infrastructure is critical for encouraging EV adoption, particularly in urban and underserved communities where at-home charging is not always an option.

- **Active Transportation:** Leading DOTs are making substantial investments in dedicated infrastructure for walking and cycling. MnDOT, for example, has a statewide plan and dedicated funding for building a network of connected "bicycle highways," providing safe and direct routes for commuters. While IDOT does fund bicycle and pedestrian projects, it lacks a similar strategic, network-focused approach to building a comprehensive statewide system for active transportation.

- **Support for Public Transit:** Many state DOTs provide operational and capital support for public transit to encourage its use as an alternative to driving. The Maryland Department of Transportation, for example, has dedicated administration that oversees and provides substantial state funding for bus, light rail, and commuter rail services. While IDOT administers pass-through funding for transit, its role in directly supporting and expanding transit services is more limited.

- **Redeveloping Land for Transit-Oriented Development:** States like New Jersey and Massachusetts have established programs that allow the state DOT to transfer or lease surplus land near transit stations to developers for the creation of compact, mixed-use, transit-oriented communities. This is a powerful tool for reducing vehicle miles traveled, but IDOT currently lacks a formal program or clear authority to pursue such initiatives.

- **Transitioning to a Zero-Emission Fleet:** Many state agencies are leading by example by converting their own vehicle fleets to zero-emission vehicles. New York, for instance, has set an aggressive target for its state fleet to be 100% zero-emission. While IDOT has begun to incorporate some EVs into its fleet, it has not yet established a formal, time-bound goal for a full transition.

By developing a more comprehensive portfolio of mitigation strategies that incorporates these best practices, IDOT can move beyond its current focus on EV charging and multimodal investments to create a more holistic and effective program for reducing transportation-related GHG emissions across the state.

Observation #28 — More Proactive Climate Adaptation Strategies Can Improve Resiliency

While IDOT's standard engineering practices address some climate-related risks and IDOT's Long-Range Transportation Plan provides recommended strategies, performance measures and implementation, climate risks are not yet systematically integrated and statewide vulnerability data are outdated. The increasing frequency and intensity of extreme weather events—from severe flooding to extreme heat—pose a growing threat to the State's transportation infrastructure, public safety, and economic stability. Unlike many of its peer DOTs, which have developed comprehensive adaptation plans, IDOT's approach remains largely reactive and project specific. This represents a critical gap in the Department's ability to prepare for and withstand the unavoidable impacts of a changing climate.

A comprehensive climate adaptation strategy involves a range of proactive measures to identify risks, protect assets, and ensure the reliability of the transportation system on a recurring basis. Key strategies being implemented by other states include:

- **Statewide Climate Risk Assessments:** A foundational step for any adaptation strategy is a comprehensive, data-driven assessment to identify the transportation assets most vulnerable to climate change. States like California (Caltrans) have completed detailed statewide vulnerability assessments that map out the impact on the state highway system with specific risks of sea-level rise, flooding, and extreme heat and are moving towards assessment for all modes of transportation (e.g., bridges, rail lines, and active transportation). IDOT has not updated the statewide assessment on a recurring basis to reflect updated climate change data with a focus on all modes of transportation, which limits its ability to prioritize investments on resilience and target resources to the most at-risk areas.

- **Resilient Infrastructure Design Guides:** Leading DOTs have developed formal resilience design guides that provide engineers and planners with clear standards and best practices for incorporating climate adaptation into project design. VDOT, for example, has published a guide that includes specific requirements for elevating bridges in floodplains and using more heat-resistant pavement materials. IDOT currently lacks an updated statewide guide fully aligned with IDOT's design standards, leading to inconsistent application of resilience considerations for projects.

- **Planning for Extreme Weather and System Redundancy:** A key component of adaptation is planning for the operational impacts of extreme weather. This includes developing strategies for managing the system during heatwaves, floods, and severe storms, as well as building redundancies to ensure that critical transportation links remain open. FDOT has an extensive program for hardening critical evacuation routes and developing contraflow plans for hurricane response. While IDOT has robust plans for snow and ice control, it lacks a similar comprehensive strategy for other forms of extreme weather.

- **Multimodal Climate Adaptation Strategy:** An effective adaptation plan must address the entire transportation network, not just highways. The Maryland Department of Transportation has developed a multimodal adaptation plan that includes strategies for protecting transit facilities, airports, and ports from climate risks. IDOT's current efforts are primarily focused on its highway assets, with less emphasis on a coordinated, multimodal approach to resilience.

- **Nature-Based Solutions:** Many states are increasingly incorporating nature-based solutions, such as green infrastructure, wetlands restoration, and permeable pavements, into their projects to manage stormwater and reduce flooding. WSDOT has a formal program that encourages the use of these solutions as a more sustainable and cost-effective alternative to traditional "gray" infrastructure like pipes and concrete channels. IDOT has an opportunity to further integrate these innovative approaches into its project design process.

Without a dedicated, statewide climate adaptation plan that includes a comprehensive recurring vulnerability assessment and clear design guidelines, IDOT's ability to protect its infrastructure and ensure the long-term reliability of the transportation system will be increasingly challenged. Developing a formal adaptation strategy allows the Department to move from a reactive to a proactive posture, enabling it to make more strategic, data-driven investments that will safeguard Illinois's transportation assets for generations to come.

Recent Progress

In response to the growing importance of environmental sustainability, IDOT has initiated several projects aimed at both mitigating climate change and adapting its infrastructure to be more resilient. The following achievements provide an overview of the Department's recent progress in this critical area.

Expanding EV Charging Infrastructure

A central part of IDOT's mitigation strategy is supporting the State's goal of having one million EVs on the road by 2030. In January 2024, IDOT announced the award of a federal grant to repair/replace 90+ Level 2 ports and 34 DC fast charging- ports statewide. Substantial progress has been made and in September 2025, IDOT announced that $18.4 million in grants will be awarded for 25 charging -station projects along interstate corridors in Illinois. Projects will include a total of 167 new charging ports. These awards are part of the second application round of the NEVI Formula Program and build on the initial round announced in 2024.

Investing in Renewable Energy and Resource Efficiency

IDOT has begun to leverage its own facilities and assets to reduce its carbon footprint. In August 2025, IDOT announced that a maintenance facility East St. Louis will be powered by solar panels installed on IDOT--owned land in Lebanon.[45] The project will power HVAC and air compressors and help warm snowplows in winter- thereby reducing reliance on grid electricity (presumably fossil fuel- derived) and reducing costs. This project uses renewable energy on State-owned- infrastructure to reduce carbon emissions and energy costs. Additionally, ongoing programs like the Aluminum Sign Recycling program, which recycles approximately 338,000 square feet of signage annually, and the statewide replacement of incandescent traffic signals with energy-efficient LED bulbs, are reducing both costs and material consumption.[46]

Advancing Research in Sustainable Materials and Practices

Through its partnership with the Illinois Center for Transportation (ICT), IDOT is actively advancing research into more sustainable transportation solutions. In October 2025, the two organizations highlighted this collaboration at a Research Showcase featuring projects on sustainable asphalt, the pavement impacts of electric vehicles, and methods for reducing wildlife-vehicle collisions. [47] This research is supported by a new six-year, $48 million agreement with ICT focused on developing next-generation mobility technologies to help achieve the goal of a safe, resilient, and net-zero emission transportation system.[48]

Investing in Multimodal and Active Transportation

IDOT continues to support alternatives to single-occupancy vehicle travel through its administration of several key funding programs. ITEP, for example, provides dedicated funding for community-based projects such as new bicycle and pedestrian paths, trails, and streetscape improvements. By investing in this infrastructure, these initiatives help to reduce VMT, lower emissions, and improve public health, while also allowing IDOT to demonstrate leadership in non-motorized mobility.

[45] Metro East IDOT Facility Soon Powered by Solar Energy | St. Louis Public Radio
[46] IDOT Highlights Commitment to Sustainability Practices During Earth Week
[47] Illinois Center for Transportation
[48] ICT, IDOT Sign $48M Agreement to Transform Transportation System

BRC Duty #8:

Transportation Investment Impacts

Blue-Ribbon Commission Duty #8

Consider ways to **improve transportation investment impacts** on goals such as improving racial equity, addressing climate change, and increasing economic growth

Background

IDOT recognizes that transportation investments should serve broader societal goals, a principle guided by its Long-Range Transportation Plan (LRTP). The LRTP establishes the agency's guiding policy framework, which includes priorities in areas such as economic growth, livability, multimodal mobility, resiliency, and stewardship. Each of these goals is supported by a series of specific objectives and performance metrics intended to inform IDOT's funding and project selection processes.

The LRTP is implemented through the State's MYP, which is composed of two distinct components: the Highway Improvement Program (HIP) and the Multimodal Program. The investment decisions within these programs are made through a variety of methods.

- Data-Driven, Performance-Based Selection: For certain programs, particularly highway capacity expansion projects, IDOT uses a data-intensive, performance-based approach. In this process, projects are scored and ranked based on objective, engineering-focused metrics such as pavement condition, bridge structural integrity, and traffic congestion levels.
- Dedicated Funding and Legislative Direction: Many other investments, particularly within the Multimodal Program, are driven by dedicated funding streams or specific legislative direction. This includes State and federal funding that is earmarked for modes such as public transit, passenger rail, and aviation. These funds are allocated based on specific programmatic requirements and are not always subject to the same performance-based, competitive selection process as highway capacity projects.

This multi-faceted approach means that while the goals of the LRTP provide an overarching policy framework, the actual programming of projects is a complex process influenced by a combination of data-driven analysis, dedicated funding streams, and statutory requirements.

BRC Observations

To better align transportation investments with State goals for equity, climate, and economic growth, several interconnected challenges must be addressed. First, there is no comprehensive, statewide understanding of the full range of transportation needs across all modes and jurisdictions, which makes it difficult to have a fully informed conversation about funding priorities. Second, the criteria used to make funding allocation decisions are limited and are not consistently applied across all programs, meaning that broader State goals are not always fully integrated into the project selection process. Finally, the current programming process creates a tension between the need to fund "shovel-ready" projects and the desire to fund "shovel-worthy" projects, highlighting the need for a more nimble and active approach to program management that can maximize the impact of every dollar invested.

Observation #29 — Illinois Lacks an Understanding of Total Statewide Investment Needs

While IDOT has a robust understanding of the needs of the State-owned highway system, there is no comprehensive, multi-modal assessment that quantifies the full range of transportation needs across the entire state. Currently, needs are identified by separate agencies—including IDOT, the Illinois Tollway, dozens of transit operators, and thousands of local governments—often using different methodologies. This fragmented approach creates gaps in understanding the system's total capital and operating requirements, particularly for local roads, transit, and intermodal connections, making it difficult to have a fully informed, statewide conversation about funding priorities.

On the State assets alone, a funding gap already exists. In its 2022 TAMP, IDOT found that it requires at least $2.3 billion in additional funds just to meet its own performance targets for pavement and bridge conditions on non-Interstate highways. This figure does not account for the incremental cost required to exceed performance targets, nor does it reflect the impact of recent construction cost inflation.

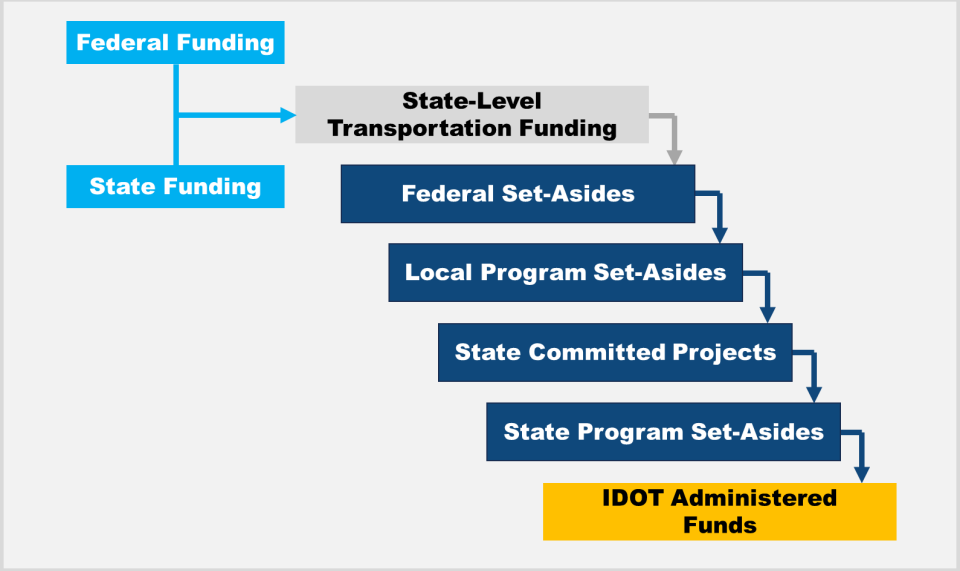
In contrast, states like Washington and Minnesota conduct comprehensive, statewide needs assessments that quantify the total cost to maintain and improve their entire transportation network, including state highways, local roads, and transit. These assessments provide a clear, data-driven foundation for legislative discussions about revenue and allow for a more strategic allocation of resources.

Developing a similar comprehensive needs assessment for Illinois provides a more robust foundation for investment decisions. Such an assessment could be used to evaluate various funding levels against specific goals related to asset conditions, economic growth, equity, and emissions reduction, thereby creating a more transparent and strategic framework for prioritizing transportation investments in a resource-constrained environment.

Observation #30 — Funding Allocation Criteria are Not Aligned with State Goals

The application of goals is not universal across all of IDOT's funding allocation processes for several reasons. A substantial share of allocation decisions is made by the ILGA, either explicitly through the appropriation of funds to specific projects or implicitly through funding distribution formulas established by statute.

Figure 9: General Flow of IDOT Administered Funds



For the programs and projects where IDOT does have discretion, the agency uses several performance-based programming practices, though their application varies. For example, IDOT awards grants to local partners under programs like ITEP, where project scores are based on public benefit and safety improvements. Similar goal-oriented criteria are applied within the Highway Safety Improvement Program and the Competitive Freight Program.

IDOT also uses broader tools for specific types of investments. For highway capacity expansion projects, the agency uses the Data-Driven Decisions (DDD) Tool. Developed based on federal guidance, the DDD Tool evaluates projects using metrics related to traffic, safety, economic development, and environmental impacts. While some of these goals overlap with the LRTP, the tool relies on a smaller number of performance measures and includes a more subjective "regional rating" score. Recent legislation, effective June 1, 2026, will require adding mode shift as a new evaluation criterion. For asset management, IDOT uses TAMP, which applies an Enterprise Asset Management System to prioritize preventative maintenance and targeted investments to reduce future costs.

While these tools allow for the application of goals within major investment categories, the practice remains inconsistent across the entire capital program. The challenge of applying goals universally is common, but some states have made strong advances. Virginia's SMART SCALE program, for example, identifies and funds projects that achieve State goals across all modes and levels of government. VDOT's LRTP defines measurable indicators tied to these goals—including equity, connectivity, and sustainability—and reports annually on progress, creating a transparent, performance-based framework that guides all State investments.

Recent Progress

IDOT has made notable progress in better aligning its transportation investments with broader State goals for equity, climate, and economic growth. These efforts have focused on updating the State's policy framework, enhancing data-driven tools, and improving program transparency.

Launch of the LRTP) Update:

In early 2025, IDOT officially launched a major update to the State's LRTP, titled "Connecting Illinois 2050." A key focus of this update is to more explicitly and meaningfully integrate the goals of equity, climate resilience, and economic opportunity into the State's transportation policy framework. The public outreach process for the LRTP update has included targeted engagement with communities to better understand their transportation needs, and the plan is being developed with a new set of performance measures specifically designed to track progress on agency goals.

Application and Enhancement of the Data-Driven Decisions Tool:

IDOT has continued to apply and enhance its DDD Tool, the primary mechanism for evaluating major capacity projects. The department used the DDD tool to evaluate 27 projects for the FY 2026-2031 Highway Improvement Program, resulting in the approval of 6 projects and over $1 billion in investments for capacity expansion. Building on this application, and in alignment with the LRTP update, IDOT has also initiated an enhancement of the tool. Since January 2025, the department has been working to incorporate a new set of scoring criteria that directly measure a project's impact on equity and its contribution to reducing greenhouse gas emissions, ensuring that future project selections are even more closely tied to these key policy objectives.

Reallocation of $400m to Support Local, Shovel-Ready Projects:

In a move toward more active program management, IDOT recently reallocated $400 million in State funding to create a new competitive grant program for local priorities. Announced in May 2025, the program prioritized "shovel-ready" projects and evaluated them based on their construction readiness and their location within economically disadvantaged areas. In response to overwhelming demand, IDOT awarded funding to 223 projects across the state, demonstrating a more flexible and strategic approach that advances statewide goals of equity and economic development.

BRC Duty #9:

Performance-Based Programming

Blue-Ribbon Commission Duty #9

Consider improvements to the performance-based programming system

Background

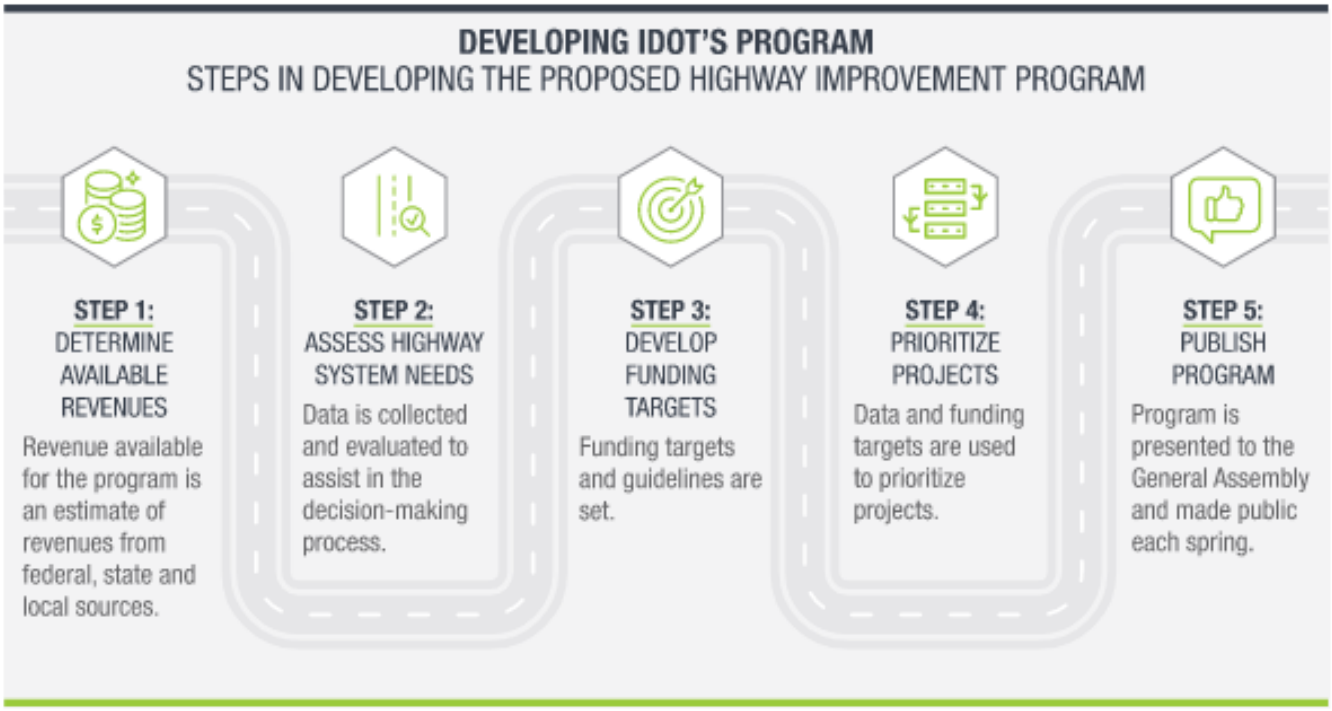
Where IDOT exercises discretion over its funds, the agency is increasingly practicing performance-based programming to achieve specific goals. This approach uses predetermined strategies and targets to guide the allocation of resources, establishing a clear link between investments and expected outcomes. It helps maximize the effectiveness of limited funding, demonstrate good stewardship, and align with State and federal laws.

IDOT's evolution toward this model was formalized in 2021 when the ILGA enacted Public Act 102-0573, which required the agency to expand its data-driven and performance-based practices. In response, IDOT has made progress in implementing the key components of this framework:

- **Asset Management Planning:** IDOT updated its TAMP for highways in FY2023, providing a detailed overview of asset conditions and investment strategies through 2032. This was complemented by an updated Transit Asset Management (TAM) Plan for systems outside the RTA region and the launch of a new Enterprise Asset Management System in FY2025 to better align investments with long-term preservation goals.
- **Project and Program-Level Tools:** For project selection, IDOT adopted a new DDD Tool in FY2023 to evaluate highway capacity expansion projects. In FY2024, the agency adopted its first combined, multi-modal Multi-Year Program (MYP), which, by law, must be data-driven, align with State performance targets, and consider impacts on climate and EJ communities. This was accompanied by a new State Rail Plan that includes a comprehensive inventory of system needs.

This entire performance-based programming process begins with the goals established in IDOT's LRTP, which provides the overarching strategic direction for all investment decisions. The process then goes through five overarching steps to develop the program:

Figure 10: Steps in Developing the Proposed Highway Improvement Program[49]



SB 2111 introduces a new statutory requirement for IDOT's project selection process. The bill mandates that IDOT evaluate a project's 'potential for mode shift away from single-occupancy vehicles and commercial motor vehicles.' This directive explicitly broadens the definition of performance beyond traditional engineering metrics and reinforces the principle that transportation investments must align with broader State goals for sustainability and multimodal mobility.

BRC Observations:

Performance-based programming is a strategic approach that links transportation investments directly to specific, measurable goals. While IDOT has made progress in adopting these practices, the BRC's analysis suggests that the State's current approach to funding allocation is not yet structured to fully optimize its historic transportation investments.

Three primary, interconnected challenges limit the effectiveness of the State's programming process. First, a large portion of transportation funding is non-discretionary and directed by statute, meaning IDOT is unable to apply its performance-based criteria to all investments. Second, the decisions that are made—both by the legislature and the agency—are often siloed by mode, geography, and level of government, making it difficult to achieve cross-cutting goals. Finally, because of these factors, total transportation spending does not always align with quantified statewide needs or overarching State goals, creating a disconnect between policy objectives and on-the-ground outcomes. The following observations detail how these issues create inefficiencies and limit the State's ability to ensure that every transportation dollar is maximizing its value.

[49] IDOT FY2026-2031 Proposed Highway & Multimodal Highway Improvement Program

Observation #31 — Only a Portion of IDOT's Investments are Discretionary and Apply Performance Metrics Applied

While the LRTP defines overarching State goals, their application is not universal across all of IDOT's funding allocation processes. A substantial share of transportation funding is non-discretionary, meaning it is directed by the ILGA either through explicit project appropriations or through statutory funding distribution formulas. These legislatively directed investments are not consistently aligned with IDOT's performance-based goals or evaluated for project readiness.

In the areas where IDOT does exercise discretion, the agency increasingly uses performance-based programming to achieve specific goals. This is most evident in two major areas:

- **Asset Management:** The TAMP uses an asset management system to prioritize projects based on their ability to reduce long-term costs through preventative maintenance and targeted investments.
- **Highway Capacity Expansion:** The DDD Tool evaluates and scores potential capacity projects based on a range of technical metrics related to traffic, safety, and economic development.

For other discretionary funds, such as multimodal grants funded through State bonds, IDOT conducts competitive selection processes that apply specific criteria. However, because a large portion of the capital program is non-discretionary, IDOT is unable to consistently apply its performance-based framework across all investments, which limits its ability to strategically align every dollar with statewide goals.

Observation #32 — Siloed Funding Decisions Can Limit System-Wide Approach

Current transportation funding allocation decisions in Illinois are often siloed by mode, geography, and level of government, making it difficult to achieve cross-cutting statewide goals like sustainability or equity.

- **By Mode:** Most funds in the MYP are specifically allocated to one mode of the State's transportation system (e.g., highway, transit, rail). While some funds can be applied to multiple modes, most projects are evaluated based on their impacts within these discrete modal categories rather than on their ability to improve multimodal connectivity across the system.
- **By Geography:** A large portion of funding is allocated directly to IDOT's nine district offices. While this ensures local needs are addressed, it can create inconsistencies in how different areas of the state are able to address needs. It can be challenging for individual district programs to fund high-cost projects that might overwhelm their annual budget, even if those projects are a high priority from a statewide perspective.
- **By Level of Government:** Funds are often made available for either the State system or local systems in large, programmatic categories that do not always vary based on need. This structure makes it difficult to assess the relative level of priority or need across different jurisdictions and can limit the ability to direct funds to the highest-impact projects, regardless of which entity owns the asset.

This siloed approach contrasts with strategies in other states that aim to break down these barriers:

- **Virginia (SMART SCALE):** This program funds capacity and operational improvements across all modes (highway, transit, bike/ped) and levels of government. Projects are evaluated in a two-tiered process, with some funds allocated based on performance within a district and the remainder allocated to the highest-performing projects on a statewide basis, allowing for a more holistic yet regionally sensitive approach.
- **North Carolina (SPOT):** NCDOT's Strategic Prioritization Office of Transportation (SPOT) evaluates projects submitted by state and local agencies at three geographic levels: statewide (40% of funds), regional (30%), and highway divisions (30%). Submitted projects can span multiple modes. This tiered approach, which also incorporates formal local input, allows for a balanced allocation that considers both statewide priorities and local needs.

Observation #33 — Investment Totals Don't Always Align with Quantified Needs or State Goals

Transportation investments in Illinois are the product of many individual decisions made across different agencies and levels of government; as a result, there is no comprehensive system to ensure that total spending aligns with quantified statewide needs or overarching State goals. This creates a disconnect between State policy objectives—such as equity and sustainability—and how transportation dollars are actually allocated.

There is an opportunity to adopt practices that measure all potential investments against a consistent set of goals and targets, putting allocation choices on an equal footing across different modes and geographies. Leading states provide clear models for this approach:

- **TxDOT:** Sets statewide investment targets through its 10-Year Unified Transportation Program (UTP), which directly links funding decisions to strategic goals like safety and congestion relief. TxDOT uses defined performance measures to track progress and reallocates funds at the program level to ensure investments stay aligned with these priorities.
- **VDOT:** Uses its SMART SCALE program to identify and fund projects that achieve state goals across all modes and levels of government. The state's "Virginia Performs" system annually tracks goals and performance measures across all state agencies, and VDOT directly links funding to these outcomes by rewarding municipalities that adopt performance-based planning with additional funding.

By developing a similar framework that systematically connects goals, performance measures, and funding decisions, Illinois could create a more transparent and accountable process. This helps policymakers and agency staff weigh the trade-offs between different priorities and ensure that every transportation investment is maximizing its value and contributing to the State's strategic goals.

Recent Progress

IDOT has made continued progress in refining and applying its performance-based programming system to guide investment decisions. These efforts have focused on the active use of asset management data to improve highway conditions and the application of data-driven tools to select major new projects.

Continued Application of TAMP:

IDOT continues to actively use its TAMP to guide investment decisions and quantify preservation needs, and the department is beginning to realize the benefits of this asset management strategy. The percentage of interstate pavements in a state of acceptable condition has increased from a low of 83.5% in 2019 to 88.2% in 2024. Other high-volume routes on the National Highway System have also seen improvement, with the percentage in acceptable condition rising from 78.2% in 2019 to 80.1% in 2024.[50] This demonstrates that the "fix-it-first" approach, guided by the TAMP, is making measurable progress in improving the condition of the state's most critical highway assets.

Continued Programming of Projects Using the Data-Driven Decisions Tool:

IDOT used its DDD Tool to inform programming in the most recent FY 2026-2031 Multi-Year Program. The tool was used to evaluate and approve 6 new capital expansion projects, including major investments on I-55/I-72 in Springfield and U.S. 6 in Morris, totaling over $1 billion. This demonstrates the continued application of a performance-based, competitive process for selecting major new highway capacity projects.

[50] IDOT FY2026-2031 Proposed Highway & Multimodal Improvement Program

BRC Duty #10:

Multi-Modal System Needs

Blue-Ribbon Commission Duty #10

Consider multimodal system needs, including public transportation, bicycle, facilities, railways, waterways, and airports

Background

Illinois is home to one of the most expansive and diverse multimodal transportation networks in the country, connecting travelers and commerce through a vast highway, rail, port, and aviation system. This includes the second-largest public transportation system, the second-largest rail system, the third-largest interstate system, and one of the busiest airport systems in the nation. The success of Illinois, its residents, businesses, and visitors relies on a safe, effective, and accessible transportation system where all modes connect in ways that improve travel options and help build communities.

Highway System

Illinois boasts the third-largest interstate system in the nation, which serves as a critical crossroads for transcontinental freight and passenger travel. In total, the State highway system comprises nearly 16,000 miles of roadways, including interstates, U.S. highways, and state routes. This network is supplemented by over 100,000 miles of locally operated and maintained roadways, creating a dense grid that connects every corner of the state.

IDOT is the primary steward of the State highway system, responsible for its planning, construction, maintenance, and operation. This includes everything from routine activities like snow and ice removal and pavement patching to the delivery of major capital projects such as bridge replacements and interstate reconstructions. Through its MYP, IDOT programs billions of dollars annually to preserve and modernize these critical assets. The Department also plays a crucial oversight role for the local road network, administering federal and State funds and providing technical assistance to counties, municipalities, and townships for their own road and bridge projects.

Rail System

Illinois lies at the center of the nation's rail network, making it a critical hub for both freight and passenger rail. The state has a comprehensive network of approximately 9,982 miles of track operated by a diverse group of 41 railroad companies. This includes all seven North American Class I freight railroads,[51] which operate the majority of the track (7,792 miles) and connect Illinois to markets on the East and West Coasts, the Gulf of Mexico, Canada, and Mexico. The remaining track (2,190 miles) is operated by 34 smaller Class II and Class III regional and short-line railroads, which provide essential "first- and last-mile" service, connecting local industries and agricultural producers to the national rail network.

Chicago is one of the largest rail gateways in the country, and another major rail center is located in the Metro East region. In addition to freight, Illinois has a robust passenger rail system, with four intercity corridors and 32 Amtrak stations.

[51] BNSF, Canadian Pacific Kansas City (CPKC), Canadian National (CN), CSX, Norfolk Southern and Union Pacific

In addition to conventional passenger rail, Illinois has been a leader in the development of high-speed rail in the Midwest. The state's primary focus has been the upgrade of the Chicago to St. Louis corridor, a multi-year, multi-billion-dollar project aimed at increasing train speeds, improving reliability, and reducing travel times. Through a combination of federal grants and state matching funds, IDOT has overseen a program of infrastructure improvements along this 284-mile corridor. This has included the replacement of track, the upgrading of signal systems to a new Positive Train Control (PTC) system, the reconstruction of bridges and culverts, and safety improvements at hundreds of grade crossings. These enhancements have enabled Amtrak trains to begin operating at speeds of up to 110 miles per hour on portions of the route, with the ultimate goal of reducing the end-to-end travel time to under five hours. This corridor is envisioned as the central spine of a broader Midwest high-speed rail network that connects Chicago to other major cities like Indianapolis, Detroit, and Minneapolis.

IDOT plays a multifaceted role in supporting the state's rail network. For passenger rail, the Department provides state funding to support Amtrak services, making it one of the leading state partners for intercity passenger rail in the nation. For freight rail, IDOT's role is primarily focused on safety and efficiency. The Department administers the state's grade crossing safety program and provides capital funding for projects that reduce congestion and improve freight movement, such as the CREATE Program. IDOT also oversees the planning and development of high-speed rail initiatives, working in partnership with federal agencies and rail operators to advance these complex, long-term projects.

Airport System

Illinois’s central location has made it a national hub for air travel. The state is home to approximately 107 public and private airports, including Chicago’s O’Hare International Airport, which consistently ranks among the busiest in the world for both passengers and air cargo.

The State's airport system is a major economic engine, more than 337,000 jobs with a combined payroll of $12.8 billion and economic output of $40.9 billion. In addition to commercial airports, Illinois has over 750 other aviation facilities, including heliports and smaller airfields, which connect communities, support medical transport, and serve general aviation.

IDOT's Division of Aeronautics is the primary State agency responsible for overseeing and supporting the State's aviation system. The Division's role includes developing the State's airport capital program, administering federal and state grants for airport improvements, and providing technical assistance to airport operators. IDOT is also responsible for inspecting and certifying airports and heliports to ensure they meet safety standards. A major current initiative is IDOT's leadership in the development of the new South Suburban Airport, where the Department is managing the planning, land acquisition, and procurement process to bring this new facility to the Chicago region.

Transit System

Across the state, a diverse network of public transit providers serves 96 of Illinois's 102 counties, providing essential mobility for millions of residents. The system has historically been anchored by the three service boards in northeastern Illinois—the CTA, Metra, and Pace—which operate under the financial and oversight authority of the RTA.

IDOT's Division of Public and Intermodal Transportation plays a critical role in supporting these systems. The Department serves as the primary administrator for federal and State capital and operating grants for all transit agencies outside of the RTA service area. For the Chicago region, IDOT has historically worked in partnership with the RTA to provide State capital funding for major projects.

Through these programs, IDOT distributes hundreds of millions of dollars each year to help transit agencies purchase new equipment, upgrade facilities, and maintain their systems in a state of good repair.

A fundamental shift in this structure was enacted with the passage of SB 2111 in 2025. The legislation dissolves the RTA and its three service boards (CTA, Metra, and Pace) and replaces them with NITA, a new consolidated metropolitan mobility authority for the six-county region. This new entity will be responsible for all transit planning, operations, and capital investment in northeastern Illinois. The legislation also clarifies and strengthens IDOT's role, designating it as the primary recipient and administrator of all federal and State transit funds for the entire state, including for the new metropolitan authority. SB 2111 also establishes new roles within IDOT, such as the Interagency Coordinating Committee on Transit Innovation and a Transit Integration Policy Development Committee chaired by the IDOT Secretary and creates a new Transit Coordination Oversight Officer within the Department. These new mandates elevate IDOT’s role in statewide transit policy and integration

Ports & Waterway System

The Illinois Marine Transportation System (IMTS) is a vital component of the state's economy, with 1,118 miles of navigable waterways that connect Illinois to both the Atlantic Ocean and the Gulf of Mexico. This network, which includes 20 public port districts and over 300 terminals, facilitates the movement of over 90 million tons of goods annually, primarily bulk commodities like grain and coal. The system also supports passenger movement through ferries and water taxis.

IDOT's role is primarily focused on supporting intermodal connectivity. Through its Bureau of Multimodal Transportation, the Department administers the Illinois Port Facilities Capital Investment Grant Program, which funds projects to improve efficiency at the state's public ports. While federal agencies manage much of the core waterway infrastructure, IDOT provides a critical direct service by owning and operating two vehicle ferries across the Illinois River, ensuring essential mobility for local communities.

Trails and Path Systems

Illinois has a growing network of hundreds of miles of dedicated multi-use trails and paths that support both active transportation and recreation for a variety of users, including pedestrians, cyclists, and others. In addition to these dedicated trails, approximately 5,000 miles of the nearly 16,000-mile State highway system are considered suitable for cycling. Further opportunities exist on the more than 100,000 miles of locally operated and maintained roadways, many of which have low traffic volumes and lower speeds that make them safe for both pedestrians and cyclists.

BRC Observations

The BRC believes Illinois' multimodal transportation system is hampered by structural challenges in funding, governance, and planning. While the state's highways, transit systems, railways, and ports are all critical economic assets, they are often managed and funded in separate silos, which limits the ability to create a truly integrated and efficient network. The following observations detail how the lack of dedicated funding for non-highway modes, fragmented governance structures, and the absence of standardized performance metrics create barriers to maximizing the value of the state's transportation investments and building a seamless system for all users.

Observation #34 — Non-Highway Modes Lack Dedicated Funding Sources

Illinois's transportation funding framework creates a structural imbalance that can often favor the highway system at the expense of other critical modes. The State constitution's "lockbox" amendment provides a protected, dedicated revenue stream for roads and bridges from the MFT and vehicle registration fees, giving the highway program a reliable funding base.

In contrast, other essential modes—including public transit, passenger rail, and ports—lack an equivalent dedicated State funding source. These systems are largely dependent on less predictable revenue streams, such as annual appropriations from the State's General Revenue Fund and periodic capital bills. For example, the FY 2026-2031 rail improvement program alone has an estimated funding shortfall of $1.2 billion to complete all identified projects. This fundamental funding disparity creates long-term uncertainty, making it difficult for transit agencies and port districts to engage in effective long-range planning.

This approach is not universal. Many other states have established dedicated, recurring funding sources for non-highway modes to ensure their long-term stability and growth:

- **Virginia:** Dedicates a portion of its statewide sales and use-tax, as well as other revenues, to create a dedicated funding stream for transit and rail through its Commonwealth Transportation Fund.
- **Michigan:** The State's Comprehensive Transportation Fund receives a dedicated portion of fuel taxes and vehicle registration fees to support public transportation services statewide.
- **California:** State law requires that a specific percentage of the state's sales tax on diesel fuel be directed to public transit and intercity rail.

By not having a similar dedicated funding mechanism for its multimodal network, Illinois puts these critical systems at a competitive disadvantage and limits their ability to plan for the future.

Observation #35 — Fragmented Governance Impedes Integrated Planning

The delivery of a truly integrated, multimodal transportation system in Illinois is hindered by two interconnected challenges: a highly fragmented external governance structure and an internal IDOT organizational structure that remains largely highway centric.

Illinois's transportation network is not managed by a single entity but by a wide array of separate agencies, each with its own jurisdiction and priorities. In the Chicago region alone, transit is divided among multiple operators, while statewide, IDOT must coordinate with Amtrak, private freight railroads, 20 public port districts, and over 100 airports. This fragmented landscape creates immense challenges for integrated planning. Major projects that cross modal or jurisdictional lines, such as the CREATE rail program, often require years of complex negotiations among dozens of stakeholders, leading to a siloed approach to project delivery.

This external fragmentation is mirrored by IDOT's internal structure. While the agency has a broad multimodal mandate, its history, funding, and organizational structure are primarily focused on the State highway system. The Office of Highways Project Implementation oversees the majority of the agency's resources and staff. In contrast, the Office of Intermodal Project Implementation (OIPI), which coordinates transit, rail, and aeronautics, has a smaller footprint. This imbalance, coupled with a lack of integrated planning across offices, limits opportunities for true multimodal collaboration.

As a result, planning often occurs in modal "silos," with road, transit, and rail projects developed in separate tracks rather than as components of a unified network. This makes it difficult to prioritize projects based on their ability to create the most effective multimodal system, leading to investment decisions that can favor highway solutions by default and missed opportunities for greater system-wide benefits.

Observation #36 — IDOT Does Not Have Standardized Multimodal Performance Metrics to Inform Investments

A gap in IDOT's ability to manage its transportation network as a truly multimodal system is the absence of a comprehensive and standardized set of performance metrics that apply across all modes.

IDOT has a robust system for measuring the performance of its highway assets, using well-defined metrics for pavement condition (International Roughness Index), bridge ratings, and safety (crash data). However, there is a lack of equivalent, statewide metrics to assess the performance of other critical modes, such as:

- **Transit:** Reliability, on-time performance, and passenger travel times.
- **Freight:** Intermodal freight efficiency and first-and-last-mile connectivity.
- **Active Transportation:** The connectivity and safety of the state's bicycle and pedestrian networks.

Without a clear and consistent set of multimodal performance metrics, it is extremely difficult for IDOT and policymakers to make data-driven investment decisions that compare the relative benefits of a project in one mode versus another. This hinders the ability to strategically allocate resources to the projects that will provide the greatest overall benefit to the state's economy and residents.

Observation #37 — Local Agencies Seek Enhanced Technical Support from IDOT

Although IDOT serves as a critical administrator of grant funding, stakeholders—particularly public transit agencies across the state—indicated a strong desire for a more active and collaborative partnership with the Department. In interviews and discussions with the BRC, transit providers repeatedly expressed a need for enhanced, hands-on technical support from IDOT to help them navigate complex federal regulations, plan for major capital projects, and implement innovative service models.

Currently, IDOT's role is often perceived by these stakeholders as being focused primarily on compliance and financial oversight rather than active, strategic partnership. This contrasts with peer states where the state DOT takes a more hands-on role, such as by embedding its own staff at major transit agencies or providing dedicated technical assistance for initiatives like bus electrification. IDOT does not have a formal program to provide this level of deep, collaborative support.

This gap, as highlighted by stakeholders, limits the ability of transit agencies—particularly smaller downstate operators with limited staff—to take full advantage of new federal funding opportunities and implement best practices. By fostering a closer, more integrated relationship and acting as the active technical partner that stakeholders are seeking, IDOT could enhance the capacity of the state's transit providers and help build a more seamless public transportation network.

Recent Progress

IDOT has taken several steps to better integrate multimodal considerations into its planning and programming. These efforts have focused on creating a more unified planning document that encompasses all modes and advancing specific modal plans that support the State's broader transportation goals.

Developing a Unified, Multimodal Program:

IDOT has advanced a more holistic approach by developing the FY 2026-2031 MYP. This unified program explicitly addresses all modes—including transit, rail, aviation, waterways, and bicycle/pedestrian accommodations—and frames its investments around performance goals for the economy, mobility, and livability. The most recent program outlines $50.6 billion in planned investments, with $18.1 billion dedicated to non-highway modes.

Advancing Specific Modal and Active Transportation Plans:

The Department has also advanced planning efforts for individual modes that tie into broader multimodal goals. The Illinois Aviation System Plan (IASP), for example, explicitly aims to improve connections between all modes of transportation, and IDOT is in the process of updating its statewide Active Transportation Plan. In terms of specific investments, the most recent MYP includes $2.9 billion for freight and passenger rail projects and outlines a dedicated marine improvement program to address needs along the state's 1,100 miles of navigable waterways.

BRC Duty #11:

Alternative Solutions Employed by Other States

Blue-Ribbon Commission Duty #11

Consider alternative solutions employed by other states

The BRC approached its eleventh duty—to consider alternative solutions employed by other states—not as an independent area of study, but as an integral component of its analysis across the other ten duties. This was an intentional decision designed to ensure that the review of best practices was focused, relevant, and directly applicable to the specific challenges and opportunities identified within Illinois. Rather than presenting a separate, standalone analysis of what other states are doing, the BRC embedded these peer state examples and alternative solutions directly within the context of each of the corresponding duties. State departments of transportation referenced throughout this report include:

- California Department of Transportation (Caltrans)
- Colorado Department of Transportation (CDOT)
- Florida Department of Transportation (FDOT)
- Indiana Department of Transportation (INDOT)
- Maryland Department of Transportation
- Michigan Department of Transportation (MDOT)
- Minnesota Department of Transportation (MnDOT)
- Missouri Department of Transportation (MoDOT)
- North Carolina Department of Transportation (NCDOT)
- Ohio Department of Transportation (ODOT)
- Pennsylvania Department of Transportation (PennDOT)
- Tennessee Department of Transportation (TDOT)
- Texas Department of Transportation (TxDOT)
- Virginia Department of Transportation (VDOT)
- Washington State Department of Transportation (WSDOT)

While these states offer valuable examples, the BRC concluded that no single DOT provides a comprehensive model for Illinois. Therefore, the Commission recommends a tailored approach: adopting the best practices from each state and adapting them to the unique needs and challenges of Illinois. In this spirit, the following report embeds these alternative solutions directly within the context of specific problems, providing actionable and relevant insights for IDOT, the ILGA, and other stakeholders as they work to modernize the state's transportation system.

4

Recommendations

Objective #1:

Accelerate Project Delivery

Current Situation

IDOT is delivering the largest capital program in its history due to funding increases from Rebuild Illinois and IIJA programs. In addition, IDOT oversees one of the nation's most complex transportation portfolios, presenting both an important responsibility and a unique opportunity to lead in project delivery innovation. Current project delivery practices vary across districts and bureaus, resulting in differences in scoping, milestone definitions, and decision-making. The BRC believes there is potential to unify procedures and tools. For example, adopting consistent digital data practices, IDOT can enhance real-time visibility into project status, variance, and risk. Strengthening knowledge transfer between phases and teams, and implementing milestone-driven reporting, will empower staff to answer key portfolio questions with confidence and clarity. The Department's phase-based structure supports deep technical expertise but also raises the need to improve consistency, communication, and accountability across the project development and delivery to be more transparent, predictable, and efficient.

To overcome longstanding challenges in project delivery and coordination, the BRC recommends that IDOT implement changes that address key pain points across the organization. This includes establishing consistent statewide procedures and data standards, deploying internal dashboards to identify variances and prompt action, and enabling earlier, more empowered coordination on right-of-way, utilities, and rail. It also calls for calibrated authority to accelerate routine decisions, preserving consultant continuity where it reduces risk, and fostering clearer industry engagement through predictable PTB/MYP lookaheads. By introducing targeted tools for RFIs, change orders, and agreements, and extending planning horizons with shared assumptions, IDOT can better manage complexity and uncertainty.

An overarching conclusion by the BRC is that IDOT must be a strong and independent agency—transparent and accountable to all users of the transportation system and to the members of the ILGA, who provide funding and oversight. As the agency responsible for managing funds, project reviews, and approvals for local agencies, IDOT plays a critical role in enabling infrastructure delivery across diverse communities. The successful delivery of local infrastructure depends not only on IDOT's responsiveness and flexibility to support agencies with the capacity to implement improvements, but also on its commitment to equity—ensuring that communities with fewer resources receive the guidance, support, and tools necessary to participate fully in the transportation system and benefit from its investments.

1

Recommendation Detail:

Implement Enhanced Project Management Practices

Recommended Actions for IDOT

1A) Standardize Project Management Procedures, Data, and Technology:

The BRC recommends that IDOT establish a statewide standard set of project management procedures, data standards, and tools that all districts and bureaus follow consistently from initiation through closeout. By codifying fundamentals such as scoping requirements, schedule milestones, and decision-making frameworks, IDOT can reduce variability, expedite approvals, and prevent the loss of critical knowledge between teams, projects, or phases.

To achieve this, IDOT will need standardized digital platforms to centralize project data, facilitate document reviews, and improve real-time oversight. IDOT has initiated a working group to design a standardized project delivery dashboard and is actively evaluating data that is captured and tools/systems utilized across the project lifecycle. The BRC encourages IDOT to continue building these capabilities to track each project's status, milestones, and key metrics, first focusing on internal-facing dashboards for operational management and accountability.

Once internal dashboards are operational, IDOT should also provide external-facing dashboards to promote transparency and accountability with outside stakeholders. These external dashboards can provide the public with updated insights into project status, while offering local agencies, contractors, and other project delivery stakeholders access to more detailed project milestone information such as document submission dates and target completion dates.

Additionally, the Commission recommends that IDOT implement a milestone-driven framework that defines target timelines for critical milestones, ranging from agreement execution to post-construction activities and even unplanned events such as change orders or RFIs. Any missed milestone should trigger a standardized report clarifying the nature of the delay, accountable parties, necessary follow-up, and impact on critical path and overall project delivery.

1B) Establish a Dedicated Central Office for Large and Complex Projects:

The BRC recommends IDOT establish and staff a dedicated central office responsible for managing large and complex projects, including projects delivered through alternative delivery methods, shifting responsibility for delivery of these projects from Districts to a central function. IDOT should also empower the new office to develop project delivery tools and processes, such as guidelines for risk assessment, quality management, and reporting, to improve project delivery speeds that can ultimately be implemented across Districts for all projects. IDOT has initiated the process of identifying leading practices from other state DOTs, as well as exploring design options for this office. An added benefit of this function or office is the ability to incubate new project delivery tools, technologies, and innovations and scale across the Department if effective.

1C) Review Internal Authority Levels:

The Commission believes that IDOT should conduct a comprehensive review of its existing authority levels at both the District and staff levels, examining delegation thresholds for contract approvals, design exceptions, change orders, and other procurement decisions to ensure the balance between centralized oversight and local autonomy is optimized for efficiency. This includes verifying that the current administrative code and internal policies establish thresholds conducive to timely approvals, while still upholding accountability. Where necessary, IDOT should consider adjusting these thresholds and supplementing these changes with targeted training and mentorship programs, equipping staff to make decisions confidently without unnecessary escalation.

1D) Pilot Cradle-to-Grave Project Manager Assignments:

In conjunction with developing a complex projects office, the Commission recommends IDOT also pilot dedicated project managers to oversee each project from initiation through final closeout, ensuring a single point of accountability for communication, decision-making, and management of risks, budgets, and schedules. The project manager will be responsible for internal coordination and collaboration across bureaus within the district and affected offices within IDOT. Consistent with the BRC's recommendations on addressing workforce needs, continuous training opportunities should be offered to elevate the consistency and quality of infrastructure delivery.

The BRC recommends IDOT pilot this approach on select projects of varying scopes and complexity, using the findings and lessons learned to shape a Department-wide rollout strategy that addresses staffing needs, training programs, and budget impacts.

1E) Pilot Consultant Staff Continuity Over Phases:

The BRC recommends that IDOT pilot an approach that retains key consultant staff across multiple project phases to preserve institutional knowledge and reduce rework. This could be achieved by including optional task orders or line items in consultant contracts that allow the Department to engage the same consultant team from one phase into the next. To support this continuity, IDOT should incorporate contingency budgets in each project phase to fund these carryover engagements when beneficial to the project.

Improve Third-Party Coordination

Recommended Actions for IDOT

2A) Accelerate Land Acquisition:

To improve project delivery, the BRC recommends that IDOT initiate the land acquisition process after NEPA clearance instead of waiting until design plans are nearly finalized, ensuring that projects can adapt to established right-of-way limits with minimal redesign. IDOT should also add provisions that allow construction or other critical activities to move forward while land acquisition is still in progress.

Where projects involve more extensive right-of-way challenges, IDOT should consider innovative delivery methods, such as P3, Design-Build, or CMGC, to give both the Department and contractors the flexibility, discretion, and incentive to optimize land needs that may result in design alternatives or approaches that reduce time, cost, or impacts on landowners.

IDOT and the AG should establish dedicated legal support for IDOT's land acquisition needs. In exploring possible structures, both agencies may consider embedding AG staff directly within IDOT or designating specialized staff in the AG's office who focus exclusively on IDOT cases. Benefits include faster legal reviews, timely guidance on eminent domain actions, and more effective resolution of complex acquisition issues, helping projects stay on schedule and on budget.

2B) Improve Coordination with Utilities and Railroads:

IDOT should initiate coordination with both utilities and railroads in Phase 1 (preliminary engineering) rather than waiting until Phase 2 (final design), reducing the costlier and more disruptive relocations that often emerge closer to construction. Early engagement with utilities clarifies relocation needs and early railroad involvement addresses design requirements, right-of-way constraints, and operational concerns before finalizing plans. Where right-of-way is already in public ownership or additional land is not required, IDOT should consider allowing utility relocations to proceed as soon as NEPA clearance is obtained.

In Phase 2 (final design), IDOT should seek formal utility concurrence and include relocation tasks in the bid package to ensure clear timelines and responsibilities. To enhance collaboration with both utilities and railroads, the Department should hold regular summits and industry forums with stakeholders, designate single points of contact for coordination, and arrange regular training sessions on utility and railroad processes for both IDOT staff and industry professionals.

IDOT should require improvement plans from utilities that detail upcoming upgrades and explore reimbursing utility providers for meeting accelerated relocation deadlines. The Department should also update template agreements with railroads to accelerate discussions around permitting, flagging, and resource commitments, further reducing legal review times and encouraging smoother negotiations.

Where critical timelines, significant utility work, or extensive railroad interaction present elevated risks, IDOT should consider alternative and innovative project delivery methods that integrate utility relocations and railroad coordination into the broader project scope, reducing siloed coordination and aligning incentives to ensure timely, cost-effective outcomes.

IDOT should also consider incorporating utility relocation pay items in contracts and allowing for in-kind service offsets to help maintain tighter control of project schedules and minimize disruptions. In cases where extensive right-of-way issues are present with railroads, IDOT should weigh alternatives, such as license agreements over full acquisitions, to minimize potential conflicts or condemnations.

2C) Pursue NEPA Assignment:

The BRC supports and encourages IDOT's current efforts to pursue NEPA assignment to expedite the environmental review process and reduce the administrative burden on both the Department and federal agencies. The BRC acknowledges the progress that IDOT has made, including issuing a notice of intent to FHWA to participate in the NEPA Assignment program and soliciting a contract for consulting assistance with the NEPA Assignment process. NEPA assignment is used in other DOTs, including Ohio and Texas, and has proven to be a valuable step in accelerating project delivery.

By assuming a larger share of NEPA responsibilities, IDOT obtains greater authority to accelerate project documentation, respond quickly to stakeholder concerns, and integrate needed adjustments in real time. This in-house capacity also enhances continuity between the environmental phase and subsequent design or construction activities, ensuring more consistent project delivery.

To achieve this, IDOT needs to prepare for an expanded role by conducting a gap analysis of its current procedures, supplementing staff training, and implementing robust quality-assurance measures. Early coordination with FHWA and relevant resource agencies will be essential, as will the adoption of clear documentation protocols that meet federal standards.

2D) Pursue Increased Thresholds for Categorical Exclusions:

IDOT should collaborate with federal partners to increase the threshold for processing environmental review Categorical Exclusions (CE), reducing administrative burdens for lower-impact projects. By raising these limits, IDOT could expedite the review process for initiatives that do not pose environmental risks, enabling IDOT to channel resources more efficiently toward complex or high-stakes endeavors. This approach also aligns with federal trends that encourage efficient reviews for projects with minimal potential impacts, making way for faster project delivery and better alignment with community needs.

2E) Embed Staff within IDOT and Local Agencies:

Where appropriate and feasible, IDOT should collaborate with local agencies, particularly those managing a high volume or complexity of projects, to evaluate where embedded IDOT staff could expedite project delivery. By placing IDOT personnel within local offices, both entities can expedite design reviews, align on right-of-way needs, and quickly address environmental or regulatory considerations. Embedding IDOT staff with local agencies also allows for a transition period to train and coordinate between agencies before IDOT delegates project oversight responsibilities to local agencies.

Further, IDOT should explore opportunities to embed staff from external agencies within its own operations or assign dedicated personnel at key State and federal partner agencies to focus exclusively on coordinating, reviewing, and approving IDOT projects. For example, this could include Army Corps of Engineers (ACOE) staff dedicated to streamlining permit reviews or embedding State agency staff at IDOT such as the Illinois Attorney General staff to help accelerate land acquisition processes or staff from DoIT to provide IT, programming, reporting, and data support. These embedded roles strengthen interagency coordination, reduce delays, and ensure that regulatory and legal requirements are addressed efficiently and proactively.

2F) Improve Coordination with SHPO:

The BRC recommends that IDOT proactively collaborate with SHPO to streamline their coordination and review processes. This effort should include continuing regular joint meetings, developing shared timelines, and clarifying communication protocols to ensure a more predictable and efficient partnership. As a central part of this initiative, IDOT and SHPO should undertake a comprehensive review of the existing Section 106 Programmatic Agreement. The goal of this review should be to identify opportunities to expand IDOT's delegated authority, allowing the department to internally approve a broader range of low-impact projects, thereby aligning Illinois more closely with the best practices of peer states and reducing bottlenecks in the project delivery pipeline.

Recommendation Detail:

3 Enhance Transparency and Partnership with Industry

Recommended Actions for IDOT

3A) Publish Semi-Annual Program/Letting Lookaheads:

Based on input from multiple industry partners, the BRC recommends IDOT provide a two-year lookahead schedule for its PTBs and the MYP, sharing this information during semiannual program update meetings with industry. By offering an early preview of anticipated contract opportunities well before the PTB publication date, IDOT can give contractors and consultants more time to plan resources, form teaming arrangements, and address qualifications gaps.

3B) Communicate Ability of Industry to Compete on All Bids:

IDOT should proactively communicate to the consulting and contracting industry that all eligible firms can compete for every project, regardless of recent selections. IDOT leadership has started this communication, and it should continue and be reinforced in the future.

3C) Proactively Engage Industry on Large / Complex Projects:

IDOT should proactively engage contractors early in the development of large or complex projects, particularly as the Department considers innovative and alternative project delivery approaches. Several other state DOTs have robust market sounding efforts to seek early feedback on large and complex projects from industry participants. IDOT can employ RFIs, industry days, and market meetings to understand additional perspectives from consultants, contractors, and, in the case of P3s, infrastructure investors and developers. Beginning this collaboration in the planning phase helps develop a shared understanding of the project's approach and goals and fosters competition.

3D) Increase Scoping Level of Detail:

IDOT should strengthen its scoping process by conducting internal scoping meetings during MYP development to increase the level of detail in scopes and budgets. IDOT should engage a cross-functional team from maintenance, operations, sustainability, and other relevant divisions to provide comprehensive input. IDOT should collect and leverage historical digital data to better anticipate common challenges and refine project needs before bid advertisement. IDOT should also pilot utilization of various-various contracts for early coordination to help the Department develop clearer scopes of work.

3E) Update Change Order Processing:

IDOT should establish a standardized, data-driven workflow for managing change orders, complete with clear timelines, digital tracking tools, and a defined target (e.g., 90 days) to finalize each request. IDOT should assign reasonable dollar or scope limits under which IDOT's Resident Engineers can approve change orders (e.g., under $25,000) and include a budget line item for change orders.

IDOT should also develop a mechanism to permit construction activities to continue while change orders are being processed, particularly when the revisions do not impact critical path work through an interim authorization mechanism.

Additionally, the Department should adopt a partnering approach with industry to discuss potential change orders and provide regular joint training on best practices. This can help reduce disputes, encourage proactive problem-solving, and keep projects moving efficiently through construction.

3F) Standardize Contract Negotiations:

IDOT should adopt a target timeline for contract finalization (e.g., 90 days), tracking performance over time, and adjusting strategies as necessary. IDOT should also pilot the use of start-up agreements covering foundational elements such as data collection, surveying, and environmental reviews, while more detailed negotiations continue.

IDOT should also offer increased training to consultants and staff on negotiation best practices to reinforce consistency and accelerate decision-making across districts.

Additionally, IDOT should pilot the use of lump sum or fixed-price contracts, which set a predefined cost for project completion regardless of actual expenses, incentivizing innovation and timely delivery.

3G) Pilot Extended Bid Timelines:

In conjunction with look-aheads, IDOT may consider piloting the extension of the current two- to four-week advertisement window to 35 days for contract opportunities released through the PTB. This gives industry partners more time to develop robust, competitive bids, enabling IDOT to receive higher-quality proposals and secure better long-term value.

3H) Adopt Digital Project Delivery Practices:

IDOT should adopt a policy requiring plans to be released in a searchable PDF format. IDOT should also implement a unified digital submission portal to eliminate manual hand-offs.

3I) Expand Collaboration Forums with Industry:

IDOT should strengthen partnerships with industry by hosting more forums where consultants, contractors, and Department leaders can openly discuss upcoming projects, emerging challenges, and sector-wide trends.

Additionally, IDOT should establish a structured working group that meets regularly with representatives from professional associations, such as engineering societies and contractor groups. This working group could discuss joint issues such as refining project delivery methods, aligning specifications, on-site negotiation training, joint workforce development programs, and shared research projects.

3J) Pilot Increased Consultant Support for Bid Preparation:

IDOT should leverage consultants to prepare final bid packages, while providing oversight. By transferring select tasks such as compiling specifications, finalizing cost estimates, and consolidating addenda, IDOT could reduce internal workloads, enabling staff to concentrate on strategic oversight and quality assurance.

3K) Establish RFI Processing Targets:

IDOT should establish standardized timelines for responding to RFIs (e.g., 90 days) and establish a system to track and report on RFI response times. This system should also provide an external view so that contractors can track open RFIs.

Recommendation Detail:

4 Implement Active Program Management Practices

Recommended Actions for IDOT

4A) Enhance Active Program Management:

IDOT should enhance its active program management approach by allowing for ongoing updates, adaptation, and decision-making throughout the project lifecycle. To facilitate that approach, IDOT should implement a comprehensive approach to tracking milestones, project-specific risks, and progress against project schedules and budgets. IDOT should require that District staff provide regular updates on progress in a standardized format, in alignment with the identified milestones and risk mitigation factors.

One of the goals of this active program management approach is to enable IDOT to reliably deliver investments that align with the resources available. This also involves spending down the existing cash balance that has accumulated following the adoption of the Rebuild Illinois capital program. IDOT should establish a target timeline by which the cash balance will be drawn down to an appropriate level, with funds targeted toward investments that align with State goals and priorities as well as the readiness principles discussed below.

4B) Prioritize Project Readiness in Programming Decisions:

IDOT should establish transparent statewide readiness standards across programs (e.g., related to land acquisition, permitting, or proactive demonstration of progress on project development) as a condition of funding allocation. IDOT should also consider adding or increasing the weighting of readiness as criteria for funding allocation (e.g., in any points-based assessment of projects through IDOT-administered grant programs).

IDOT can increase the number of projects that are both ready and aligned with State goals by investing today in developing a robust project pipeline. IDOT and its partner agencies should maintain an ongoing inventory of potential investments that could be supported with additional funding. These efforts enable the Department and its partners to act quickly when new funding is made available at the federal level. Greater visibility on potential future investments could also allow for IDOT and its partner agencies to identify and mitigate any project-specific risks in advance.

4C) Reallocate Funds to Maximize Effectiveness of Project Delivery and Achievement of State Goals:

To apply the active program management in Recommendation 4A, IDOT should create a formal process to reallocate funds from current projects when there are delays or changes affecting their goals, timeline, or budget. The approach should include a consistent and transparent framework to identify projects at risk of delay or over-budget and for funds to be relocated or rephased across Districts and programs. To implement this recommendation, IDOT should first establish a pilot program through which a specified pool of funds could be subject to future reallocation and re-phasing. Based on the results of that pilot, IDOT could then expand the approach to apply to more IDOT investments and/or IDOT-administered grant programs.

5

Recommendation Detail:

Improve the Efficiency of the Programming Process

Recommended Actions for IDOT

5A) Extend the MYP Horizon:

IDOT should extend the horizon of its capital planning process from the current six-year period to a ten-year period, as many of IDOT's high-cost and high-complexity projects exceed the six-year planning window. This allows for greater visibility for long-term staffing and financial resources planning. Extending the MYP complements other recommendations later in this report that encourages IDOT and the ILGA to provide greater flexibility in funding. With a longer time horizon, IDOT and its partners could leverage additional flexibility when specific needs require greater levels of investment.

5B) Establish Shared Assumptions and Approaches Across IDOT Districts:

IDOT should establish shared assumptions and standardized approaches across all Districts when selecting and programming projects. This should include:

- Cost escalation rates (based on both general inflation and construction cost inflation).
- Anticipated project timelines, including reasonable minimum timelines on different project phases.
- Standardized assessments of project readiness (as noted in Recommendation 4B).

Based on the results of this standardized approach, IDOT could also consider identifying assumptions that could be included as a required shared assumption in State administered grant programs.

5C) Explore Concentrating Federal Funds:

IDOT should concentrate federal funds on a defined subset of major projects, particularly those that are already federalized. This ensures that federal resources are directed toward projects where they provide the greatest leverage and where federal oversight and standards already apply.

To test this approach, IDOT should identify a category of current projects funded with federal dollars but not otherwise subject to federal review requirements. IDOT should then select a pilot group of these projects and replace their federal funding with non-federal sources. If de-federalizing accelerates timelines, it may also reduce overall project costs, potentially on more than a dollar-for-dollar basis. IDOT should monitor the pilot projects' costs and timelines to determine whether they proceed faster and at lower cost than comparable federalized projects.

Based on the results of the pilot effort, IDOT should consider expanding the approach to larger elements of its ongoing investments. IDOT should also collaborate with the ILGA to identify any long-term changes required to enable the flexibility to shift funds between investments as required. Finally, IDOT should establish transparent reporting to show how concentrating federal funds affects project delivery and the distribution of State-controlled funds. This reporting should clarify how State funds are being redirected to support non-federalized projects, including local road maintenance, transit, and active transportation.

6

Recommendation Detail:

Increase Delegation of Authority from IDOT to Local Agencies

Recommended Actions for IDOT

6A) Increase Delegation of Local Roads Jurisdictional Authority:

IDOT can better support local agencies by delegating greater authority over design standards while also establishing a clearer process for the jurisdictional transfer of local roads, including ownership and maintenance responsibilities. This latter effort may include the development of a framework to provide criteria for identifying appropriate transfer candidates while ensuring that receiving agencies have demonstrated capability to manage transferred infrastructure effectively. The evaluation process could consider factors such as traffic volume and composition, infrastructure condition, land use patterns, local maintenance capacity, and alignment with community development goals. This may involve creating funding methods that support facility transfers so local agencies can maintain them long-term. It should prevent agencies from receiving infrastructure with maintenance needs but without sufficient resources. The framework might include condition checks before transfers and funding adjustments based on the infrastructure's actual state.

6B) Increase Delegation of Design Review Authority:

IDOT should seek to increase the delegation of design review authority to local agencies. This may include authorizing qualified local agencies to conduct Phase 2 design reviews using standardized systems, reducing IDOT bottlenecks in project approval cycles while maintaining established compliance standards. This delegation could focus on routine projects that fall within standard design parameters and can be effectively managed by local engineering staff with appropriate training and oversight protocols.

The program could enable local public agency engineers to seal plans and conduct environmental surveys in compliance with State and federal requirements, expanding local capacity for project delivery while ensuring appropriate professional oversight. To support this delegation, IDOT could establish clear qualification standards and provide necessary training to ensure local engineers understand applicable requirements and procedures.

For specialized needs that exceed local capacity, IDOT could retain qualified third parties to conduct environmental investigations and proactively identify and categorize potentially historic bridges and resources to expedite project timelines. This proactive approach reduces delays associated with environmental compliance while maintaining thorough assessment standards for sensitive resources.

Recognizing that State highway design standards may not always serve local community needs effectively, IDOT could implement urban-specific design guidelines or transfer design jurisdiction responsibilities to local agencies that are better equipped to address pedestrian-centered, multi-modal community infrastructure needs. These local agencies often have a deeper understanding of community context and development goals, enabling them to design infrastructure that serves both transportation and community development objectives more effectively than standardized State highway approaches.

To assess effectiveness and develop a long-term strategic approach for delegating design review authority, IDOT should collaborate with local agencies to identify and develop pilot projects that can test the new approach under real-world conditions. These pilots should include

diverse project types and local agencies (county and local public agency) to ensure the policy works effectively across different scenarios and provides valuable insights for program refinement before broader rollout.

6C) Increase Delegation of Letting Authority:

IDOT should increase the delegation of authority over letting to local agencies. This may include conducting a comprehensive review of the county or local agency certification process and partner with the American Council of Engineering Companies (ACEC) and county associations to develop enhanced certification training programs. This expanded training could prepare additional county and local public agencies to conduct their own project lettings in compliance with State and federal requirements. The certification process could ensure that local entities have staff capable of managing complex procurement processes while maintaining the competitive standards and oversight requirements necessary for public infrastructure projects. Once certified, counties and larger local public agencies could be encouraged to conduct their own project lettings for federally funded projects through a system where IDOT transfers federal funds directly at the time of letting. Under this arrangement, local entities assume contractor risk and performance responsibility, enabling them to respond more quickly to local project needs and market conditions. This approach reduces dependency on State letting schedules while maintaining federal compliance through properly trained and certified local staff.

The delegated letting program could include mandated training updates to ensure certified agencies remain current with evolving procurement regulations and best practices. Performance monitoring and periodic recertification requirements could ensure that delegated authority continues to produce appropriate outcomes while providing mechanisms for addressing any issues that arise in local letting processes.

6D) Expand Local Agency Technical Support Services:

As part of these efforts, IDOT should expand and formalize its technical assistance for local programs to support increased delegation of authority as well as service areas of the state not served by MPOs, helping local governments in these regions more accurately perform project risk management and cost estimation. This capacity could be staffed with specialists in cost estimation, risk assessment, and project management who can provide local agencies with access to current market data, standardized risk assessment tools, and specialized expertise for evaluating complex technical challenges that exceed routine local capacity. By doing so, IDOT can reduce schedule and budget inaccuracies that often undermine project success. IDOT can also develop and maintain standardized cost estimation tools and databases that reflect current Illinois market conditions, material costs, and labor rates across different regions of the state.

These tools could be regularly updated and made accessible through user-friendly platforms, enabling local agencies to develop more accurate project budgets while understanding the assumptions and variables that drive cost estimates.

IDOT could offer training and technical assistance on project risk identification and mitigation strategies, including guidance on regulatory compliance, environmental considerations, and construction scheduling factors. To ensure ongoing effectiveness, IDOT could coordinate regular workshops, webinars, and peer learning opportunities for local agencies to share experiences, along with an advisory service for consultation on complex or unusual projects.

7

Recommendation Detail:

Streamline IDOT Oversight and Improve Visibility for Local Agencies

Recommended Actions for IDOT

7A) Develop a Capital Grants Guide:

IDOT should create a capital grants guide that consolidates all requirements, procedures, and standards for each type of capital grant program into a single, accessible resource. This manual should clearly specify all mandatory requirements that local agencies must meet throughout the grant lifecycle.

The manual could be organized by grant type and project phase, allowing local agencies to easily identify applicable requirements for their specific circumstances. To ensure accuracy and usefulness, IDOT could establish a regular update schedule for the manual, with quarterly reviews to incorporate changes and lessons learned from recent grant cycles.

When requirements change, IDOT should provide advance notice to local agencies through multiple communication channels and document changes in the manual with effective dates and transition provisions. Additionally, IDOT could make the manual easily accessible through its website and provide training sessions for local agency staff.

7B) Update Local Agency Agreements Process:

IDOT should seek to simplify and accelerate the process to establish agreements with local agencies. This may include consolidating agreement review responsibility. The transition requires internal coordination within IDOT to develop standards and protocols that ensure consistent review quality across all agreements.

IDOT could redesign agreement templates to eliminate duplicative signature requirements that add processing time without enhancing oversight. Where multiple approvals are genuinely necessary, these could be structured to occur simultaneously where possible rather than sequentially. IDOT could explore authorizing limited upfront project funding while agreements undergo processing, allowing local agencies to begin preliminary tasks that are common to most projects and present minimal risk.

For agreements that do not deviate from standard template terms, IDOT could establish an expedited review process that recognizes their routine nature. This tiered approach allows more complex or non-standard agreements to receive a more intensive review while preventing standard agreements from unnecessary delays. IDOT could establish target timelines for agreement review by type and track actual processing times to identify agreements that exceed targets and require intervention.

7C) Establish Predictable Form Management:

IDOT should implement a predictable publishing schedule for form updates to minimize the frequency of changes. This structured approach allows local governments to plan their submission schedules around known update periods and reduce the likelihood of submitting outdated forms.

When forms are updated, IDOT should provide clear documentation specifying the exact changes between versions, enabling local agencies to quickly identify what modifications are required rather than reviewing entire documents for differences. IDOT should allow projects to proceed with forms that were valid and current at the time of submission, even if newer versions have since been released.

7D) Implement Transparent Project Tracking:

IDOT should establish clear target timelines for each step in the agreement review process, with an overall goal timeframe for completing standard reviews (e.g., within 90 days or less). These target timelines should be communicated to local partners and used as performance benchmarks for internal process management.

To improve transparency and reduce the administrative burden on both IDOT and local agencies, IDOT should develop an external-facing project status dashboard that provides real-time information about where each project stands in the review process. This dashboard should clearly identify which party is responsible for the next action at each stage. This dashboard should also be modified and made available to the general public to provide updates on timelines and project status.

7E) Develop Bundled Procurement Procedures:

IDOT should group routine services such as signage, striping, resurfacing, and signal maintenance under consolidated procurement procedures that reduce the need for multiple individual agreements and review processes. Under this improved approach, IDOT issues geographic or service-specific procurements that allow local agencies to access pre-approved contractors and standard pricing without requiring separate engineering and construction agreements for each project. Local agencies benefit from faster project initiation and reduced administrative overhead, while IDOT achieves greater efficiency in managing routine infrastructure work across multiple communities.

For capital procurements such as transit vehicles, EV charging stations, and specialized equipment, IDOT should consider consolidated contracts that leverage IDOT's purchasing power to secure better pricing and terms while standardizing procurement procedures across multiple local projects.

Objective #1: Accelerate Project Delivery
Considerations for the General Assembly

The foregoing recommendations that the Blue-Ribbon Commission put forward for IDOT are dependent on multiple factors, including those beyond the direct control of the Department. To meet the objective of accelerating project delivery, there are items for the ILGA to consider:

Raise IDOT's Land Acquisition Purchase Threshold:
IDOT benefits if 30 ILCS 545/2(b) is amended to raise the threshold at which IDOT must seek external approval for land acquisitions. Currently, parcels priced above $25,000 require the Attorney General's involvement, slowing mid-range purchases that could be handled administratively. By updating this statutory cap and indexing it to inflation, the State empowers IDOT to efficiently negotiate and secure routine parcels. This reform helps keep projects on schedule, mitigate cost overruns, and free the Attorney General's office to focus on more complex or contested eminent domain proceedings. Raising IDOT's purchase threshold also aligns Illinois with peer states and Illinois Tollway that grant their transportation agencies broader administrative authority, ensuring land acquisition timelines better reflect present-day property values. Under this reform, the Attorney General still retains oversight for higher-value or contested deals, while IDOT gains the flexibility to finalize smaller acquisitions swiftly and cost-effectively.

Enable NEPA Assignment:
IDOT is pursuing the ability to assume the legal and procedural responsibilities tied to NEPA assignment, which reduces schedule risks and cost. Under this revised statutory framework, IDOT is permitted to take direct accountability for environmental reviews; however, it also assumes resulting litigation typically held by federal agencies. This reflects emerging guidance from the FHWA and positions IDOT to more effectively fulfill its NEPA obligations.

Authorize Conditional Right-of-Way Certificate for Federal Compliance:
Currently the Department must acquire all parcels before seeking federal approval to begin construction. This creates costly delays when only a few properties remain under negotiation or in condemnation. Amending 605 ILCS 5/4 and 735 ILCS 30/25 to permit IDOT to issue conditional or partial right-of-way certificates for federally funded transportation projects allows IDOT to proceed with large portions of a project while finalizing land acquisition on the remaining parcels.

Optimize Utilities Relocations:
Utilities can carry out system upgrades with little notice to IDOT, creating interface risk, project delays, and costly double-digging. Amending 605 ILCS 5/9-113 and/or the Illinois Public Utilities Act (220 ILCS 5) to require all utility owners with facilities in the State right-of-way to submit regular capital improvement plans and participate in a statewide data-sharing platform allows IDOT to more effectively align utility relocations with highway construction timelines and project plans. Empowering IDOT to pay for or cost-share expedited relocations in limited circumstances further reduces delays from utility relocations.

Create Expedited Incidental Take Permitting for Routine Projects:
Low environmental impact activities such as basic road maintenance and minor bridge repairs are currently subject to the same authorization process as larger, higher-risk undertakings. Amending 520 ILCS 10/5.5 to allow for simplified or programmatic approach to incidental take permitting for routine projects enables IDOT to expedite essential transportation work while still safeguarding sensitive species and their habitats. This revision also relieves administrative burden on the Department of

Natural Resources (DNR) and enable it to focus resources on higher-risk or complex cases, further reducing project delays.

Expedite Minor Rail Crossing Approvals without Full ICC Hearings:
Granting IDOT the discretion to approve low-impact rail crossing modifications without requiring full ICC hearings allows the Department to implement essential safety measures more quickly and the ICC to focus on more complex or higher-risk crossing modifications. Under 625 ILCS 5/18(c)-7401, minor safety or maintenance upgrades such as signage changes or pavement repairs must go through the same process as entirely new crossings, extending project schedules.

Simplify Waterway Permit Process for Minor Infrastructure Projects:
Under the current permitting process, routine bridge repairs and low-impact culvert improvements must undergo the same approval procedures as major construction initiatives. Amending 615 ILCS 5/18 to establish an accelerated or general permit classification for minor infrastructure projects affecting waterways allows IDOT to respond more quickly to urgent maintenance needs, reducing cost overruns and delays. It also reduces the administrative workload on the DNR, which could then focus on reviewing more significant or environmentally sensitive proposals.

Authorize IDOT to Delegate Construction Letting Authority:
IDOT should be granted authority to delegate construction letting authority to certified local agencies, enable direct transfer of federal funds to these agencies at the time of letting, establish certification standards, and define oversight requirements. This authority enables responsive local project delivery while maintaining appropriate accountability for public resources.

Strengthening Options for Innovative Project Delivery Methods:
The BRC has identified several considerations to improve the P3 and alternative project delivery framework that enables IDOT to undertake innovative delivery models. These include:

- *Delegate Approval for P3 Projects:* Delegating approval authority to IDOT under 630 ILCS 5/15(d) grants IDOT the ability to negotiate project details, solicit private-sector input, and competitively secure P3 partners. Under existing law, IDOT must seek a joint resolution to initiate a P3, slowing the Department's ability to secure investment, promote innovation, and address critical transportation priorities. This requirement is unique among state DOTs with similar P3 authority and prohibiting commercial interactions with infrastructure investors and developers may negatively impact market interest in projects. The BRC recommends that the joint resolution requirement is removed.

- *Raise the Annual Cap on Alternative Project Delivery Methods:* The BRC recognizes the recent changes to 630 ILCS 10/15(a); however, believes further amendment to raise or remove the current annual $500 million cap on alternative project delivery methods for IDOT is warranted. Cost escalation and inflation in recent years have raised the overall cost of transportation investments. Once IDOT reaches the $500 million limit it must revert to more conventional (and often slower) procurement. By removing this restriction, Illinois can ensure that IDOT has the available tools to deliver large-scale or multiple mid-range projects. Further, expanding IDOT's ability to employ alternative delivery strategies creates room for competition, early contractor involvement, and technological innovation. Contractors benefit from expedited bidding processes, while taxpayers see a return on investment through faster project delivery and potential cost savings. This update aligns Illinois with peer DOTs that grant their transportation agencies broader latitude to select the most efficient procurement methods for each project's unique challenges.

- *Allow Use of ATCs at the Department's Discretion*: ATCs are a critical component of alternative delivery, design-build, and P3 procurement processes. With a more flexible ATC framework, IDOT could reduce project timelines, reduce cost, and promote creative engineering approaches that better serve Illinois' diverse transportation needs. When contractors are permitted to submit alternative proposals in design-bid-build solicitations, they frequently identify opportunities to optimize work, utilize cutting-edge materials, or optimize designs to enhance safety, avoid right-of-way acquisition, minimize utility and rail impacts, and cut costs. Applying a similar approach to alternative delivery, design-build, and P3s under 30 ILCS 500/1-10.5(b) will increase innovation and improve project outcomes.

- *Enable Early Contractor Involvement:* Authorizing Early Contractor Involvement (ECI) under 30 ILCS 537 enables IDOT to realize the full benefits of innovative delivery. While design-build and CMGC options exist in Illinois, the statutes do not clearly define or permit pre-bid collaboration—an essential component of ECI. Clarifying when and how IDOT may engage contractors in a project's early design and scoping phases will facilitate a more informed project development process.

Streamline Small, Mid-Range and Reoccurring Procurements:

The BRC has identified several considerations to streamline procurements for small, mid-range and/or reoccurring purchases. These recommendations address relatively low-value procurements that require a disproportionate administrative resource and include:

- *Raise Small Purchase Threshold or Provide Waiver for Critical Supplies:* Under the current threshold of $100,000, IDOT must engage in a full, formal bidding process even for critical low-value materials (e.g., road salt) that frequently need rapid replenishment, particularly in severe weather seasons. By increasing this limit under 30 ILCS 500/20-20 (e.g., to $150,000–$200,000) or granting IDOT a specialized cap (e.g., $300,000) for time-sensitive, high-priority purchases, the State could minimize procurement delays that potentially jeopardize safety and hinder prompt project delivery. This change allows IDOT to expedite acquisitions when facing pressing conditions without sacrificing oversight, enabling IDOT staff to focus on strategic, higher-value procurements.

- *Create a Recurring Commodity Exception:* Frequently used items such as road salt, asphalt patching mixes, or reflective signs, must navigate the formal bid process repeatedly that can delay time-sensitive replenishments. Codifying an exception for recurring purchases in 30 ILCS 500 permits IDOT to use a single, competitively awarded multi-year contract or an automated renewal structure, maintaining transparency while eliminating frequent rebids. In addition to reducing lead times, such an exemption could also foster bulk-buying strategies, greater price stability, and more consistent vendor relationships, promoting cost-effectiveness and reliability. Retaining thresholds ensures that higher-value or sensitive contracts continue to receive the necessary oversight. This brings Illinois' procurement code in closer alignment with peer states.

- *Increase Contract Signature Threshold:* Currently, the Secretary, Chief Legal Counsel, and Chief Fiscal Officer (or their designees) must each sign any contract worth $250,000 or more—a limit set in 1995. Mid-range projects now commonly exceed this amount, and leadership must frequently approve routine procurements which slows project timelines. Amending 30 ILCS 105/9.02(a)(1) to increase the contract value threshold that triggers high-level signatures for IDOT agreements (e.g., to $750,000) and indexing it to inflation brings this requirement in line with present-day project costs, improve workflow efficiency, and reduce administrative costs. The increased threshold does not eliminate vital oversight; rather, it frees executive staff to focus on higher-value or more complex procurements.

- *Simplify the Solicitation Process for Mid-Range Contracts*: Establishing a simplified solicitation process for mid-range IDOT contracts (i.e., under $1,000,000) enables IDOT to award these contracts more quickly while retaining fair competition. Currently, all contracts over a certain threshold must follow advertising and bidding requirements that can create delays for smaller-scale or routine projects. This approach aligns Illinois with peer states employing tiered solicitations, in which mid-range projects can forgo lengthy procedures while continuing to uphold transparency and competition.

Establish a Procurement Exemption for Transportation Pilots:
Creating a procurement exemption for evolving transportation technology pilots under 30 ILCS 500/20-20 aligns Illinois with states that more quickly adapt next-generation solutions. This targeted exemption fosters a balanced approach—alleviating burdensome reviews for low-volume, high-value experiments, and reserving rigorous oversight for major, established procurements – while ensuring efficiency, safety, and sustainability keep pace with national best practices.

Objective #2:

Expand Workforce Capacity

Current Situation

IDOT is responsible for a $50.6 billion multi-year capital program, the largest in its history. Meanwhile, IDOT's headcount has not expanded to support this increased level of expected production and remains in line with 2019 levels when the multi-year capital program was $10B. When compared to peer DOTs, IDOT's current headcount (~5,100 FTEs) is lower (e.g., California: ~20,800 FTEs, Texas: ~12,800 FTEs, Pennsylvania: ~10,800 FTEs, North Carolina: ~9,100 FTEs, Virginia: ~7,300 FTEs)[52] despite IDOT having a larger annual capital budget.

More broadly, the transportation industry nationwide faces unprecedented workforce challenges, with an aging employee base and insufficient new talent entering the field to replace retiring workers. This has created increased competition to hire qualified professionals and skilled tradespeople across transportation-related disciplines, particularly in specialized fields such as engineering, project management, and construction. These jobs involve a rigorous combination of academic qualifications, technical certifications, and practical experience. IDOT operates within this hiring environment and competes for talent against both private sector companies and other public agencies for the same pool of skilled candidates. Similarly, the employers within IDOT's supply chain—the consultants and contractors responsible for delivery of the capital program—also operate within this competitive environment, albeit with greater flexibility in the salaries and benefits that they can offer.

In this context, IDOT needs to both expand its direct capacity and be a supportive participant to help build the capacity of the supply chain partners that it depends on for program delivery. From an internal workforce perspective, capacity expansion means filling vacancies, retaining existing workers and securing approval to exceed current headcount levels where demand for human capital surpasses supply.

Equally, it means identifying opportunities to increase the productivity of existing staff by reducing process inefficiencies and adopting innovative approaches to modernize current ways of working. In addition, where shortfalls in staffing remain, it means adopting temporary measures —such as the use of service agreements or fixed term employment contracts—to provide immediate relief, to address the backlogs of work that have arisen, and to support critical IDOT functions during this pivotal transition phase for the organization.

IDOT also plays a critical role in supporting the development of the transportation workforce across Illinois, so that more eligible workers choose to enter and remain in the industry, either as a direct IDOT employee or as an employee of a firm supporting delivery of IDOT's program. IDOT has an opportunity to be a visible, proactive leader in establishing and growing a robust pipeline of future transportation talent. This includes providing support and guidance to small and diverse businesses, and expanding the methods that transportation sector employers, including IDOT, deploy to find, inform, excite and attract talent into the transportation workforce.

The BRC's workforce recommendations are structured around three core actions: first, establishing an ambitious staffing target; second, implementing comprehensive recruitment and retention strategies to achieve those targets; and third, maintaining transparent reporting on progress toward workforce goals to ensure accountability and inform ongoing adjustments.

Recently, IDOT led an effort in collaboration with CMS to reduce the number of steps in the hiring process from more than 100 down to 16. This improvement – supported by in-house tools and reporting – is now being used by hiring managers and by the HR department to reduce time to hire, while

[52] Federal Highway Administration, Highway Statistics 2023, Table HF-1, American Association of State Highway and Transportation Officials, 2022 Salary Survey

remaining compliant with hiring regulations and policies. This facilitates regular communication between HR, hiring managers, and CMS to resolve hiring bottlenecks.

IDOT is also piloting new approaches to the ways in which it onboards talent including the use of State Hiring Plans that do not require interviews, where appropriate. The BRC encourages IDOT to continue to deploy these approaches, to move beyond pilots and to continue to innovate how it delivers talent acquisition. This includes reforming governance frameworks and hiring mechanisms, enhancing accountability, leveraging technology improvements, and utilizing ongoing, flexible recruitment strategies.

Note, the recommendations presented in this section reflect the status of the federal DBE program as of the drafting period, prior to the BRC's adoption of recommendations in October 2025. While changes to the DBE program are actively underway, the BRC has taken these potential developments into account in shaping its recommendations. As such, the recommendations are intended to remain relevant and aligned with the broader goals of supporting small businesses, even if specific terminology or program structures evolve. As more information becomes available, further consideration may be warranted; however, the recommendations in this document should be viewed as a foundation for continued progress in workforce development and support for small and diverse businesses.

Recommendation:

8 Expand IDOT's Headcount in Targeted Areas

Recommended Actions for IDOT

8A) Set and Achieve a Flexible, Ambitious Headcount Growth Target:

IDOT must address immediate and ongoing workforce capacity constraints that affect project delivery timelines and the Department's ability to effectively oversee its capital program. Based on benchmarking analysis of similar DOTs, IDOT should increase its headcount by 1,400 to 2,000 staff, resulting in an overall headcount between 6,400 to 7,000 total staff. The BRC recommends that the headcount increases should be in targeted areas where additional capacity and skillsets are needed to fulfill the department's mission The BRC also recommends that IDOT implement a plan to achieve this headcount target in three to five years in cooperation with CMS, universities, trade schools, and industry.

This estimate is based on various metrics such as historical comparisons of IDOT's headcount relative to its capital program size, employee engagement survey feedback, and qualitative feedback from Departmental and stakeholder interviews. IDOT should validate this target range internally and in consultation with CMS and GOMB. There should also be a process to evaluate and adjust targets regularly based on changing operational needs and external conditions. As IDOT pursues workforce objectives, the Department is required to work within the State's broader workforce rules and requirements and in close coordination with CMS, the centralized human resources agency for Illinois.

*Following the passage of SB 2111, the BRC has revised its headcount recommendation to reflect a potential 12% decrease in IDOT's annual capital program. The initial recommendation for a 1,400 to 2,000 FTE increase has been proportionally adjusted to a range of **1,200 to 1,700 FTEs**.*

8B) Implement Recruitment and Retention Strategy:

Achieving this headcount target requires pursuing a combination of complementary strategies that address immediate capacity gaps and long-term workforce sustainability, including:

- **Implement skills-based hiring models:** Where appropriate, prioritize practical experience and demonstrated competencies over traditional educational credentials, particularly in positions where a specific degree or license may not be needed. The BRC recommends that IDOT develop competency-based job descriptions and assessment methods that evaluate candidates' ability to perform specific functions while maintaining necessary professional standards. This approach will increase the qualified pool of candidates from military service, industry, or alternative training programs, particularly for technical positions where hands-on experience with construction methods or field operations skills are required.
- **Strengthen conversion of interns and temporary workers:** Establish clear, structured pathways to convert high-performing interns and temporary workers into permanent positions, particularly for more specialized programs like the Graduate Public Service

Internship Program. Develop defined conversion timelines that provide interns and temporary workers with clear expectations for permanent employment opportunities. This approach should work within State hiring regulations while maximizing IDOT's ability to retain individuals who have already demonstrated value and familiarity with Department operations.

- **Establish retention incentives for retirement-eligible staff:** Explore flexible retirement options such as part-time work arrangements, independent consulting or 1099 contracts, or phased retirement programs that allow seasoned professionals to reduce workload while remaining engaged with critical projects. Simultaneously, IDOT should implement structured mentorship programs that pair retired and retirement-eligible staff with newer employees, including formal documentation processes and project-based learning opportunities. This will transition institutional knowledge more effectively to increase productivity of younger staff members.

8C) Monitor Progress and Sustain Organizational Performance:

As IDOT improves recruiting, retention, and overall hiring throughput, the Department should continue to develop existing and build new tracking mechanisms to monitor headcount progress versus targets, employee satisfaction, retention rates, and other organizational capacity metrics. These will be used to evaluate effectiveness of new initiatives, identify training needs, monitor workload, and prevent burnout/ attrition; ultimately contributing to IDOT's capacity to deliver.

Reduce Time-to-Hire

Recommended Actions for IDOT

9A) Collaborate with CMS to update the Framework Governing IDOT's Hiring Authority and Processes:

IDOT should collaborate with CMS to review and update the Comprehensive Employment Plan (CEP), which serves as the governing document for CMS oversight of IDOT's hiring process. This update should focus on streamlining position reviews, establishing fast-track approval mechanisms for critical roles, and improving coordination protocols between agencies. Clear accountability measures and escalation procedures should be established to facilitate the goal of reducing time to hire. The CEP should be amended to permit IDOT to use the hiring process tools detailed below.

9B) Expand Use of Accelerated Hiring Plans:

IDOT should continue and expand the use of hiring plans which do not require interviews (e.g., Standardized Hiring Plan E). These simplified hiring mechanisms can help reduce time-to-hire for positions where qualifications can be adequately assessed through application materials and background verification, particularly for entry-level and technical positions with clear competency requirements.

9C) Implement Continuously Open Requisitions for High-Demand Positions:

IDOT should establish continuously open or "evergreen" requisitions that remain open for positions with chronic staffing shortages or high turnover rates. This approach eliminates the delays associated with repeatedly posting, closing, and re-opening positions, enabling immediate candidate review and selection as vacancies arise.

9D) Leverage Data to Improve Performance and increase Accountability and Transparency:

Recently, IDOT has piloted the use of a performance dashboard that tracks the average time it takes to complete each stage of the hiring process. IDOT should further leverage the data from this dashboard to establish specific benchmarks and concrete timelines for HR performance metrics. This could include time-to-hire targets that reflect both industry standards and IDOT's operational needs. These metrics should be internally published on a regular basis to maintain accountability and transparency, creating visibility into hiring progress and enabling the rapid identification of emerging bottlenecks.

9E) Improve Flexibility in Candidate Evaluations:

To widen the pool of available talent, the BRC recommends that IDOT consider candidates who fall just below standard acceptance criteria where appropriate, while ensuring quality standards are upheld. This approach could be necessary during an aggressive workforce expansion, when finding ideal candidates for some positions may be challenging. By broadening the criteria slightly, IDOT can access a wider range of potential talent without compromising their standards.

9F) Automate Hiring Progress Reports:

To support effective monitoring, IDOT also should collaborate with DoIT to enable automatic generation of hiring progress reports that track where new staff are being placed throughout the organization and how expansion aligns with strategic workforce plans. This will facilitate improved visibility and improved effectiveness of hiring activity.

9G) Standardize Hiring Tools and Processes to Improve Efficiency and Consistency:

IDOT should collaborate with DoIT and CMS to develop and implement standardized hiring process tools including interview question banks organized by position type, consistent scoring templates, and reference and background check procedures. Standardization and automation of hiring tools reduces preparation time for HR personnel while ensuring consistent candidate evaluation, ultimately improving both speed and quality of hiring decisions. Through systematic implementation of these time-to-hire improvements, IDOT can reduce recruitment timelines and compete more effectively in the talent market, ultimately supporting the rapid workforce expansion necessary to meet IDOT's current and future operational needs.

Improve IDOT Employer Competitiveness

Recommended Actions for IDOT

10A) Leverage Employee Feedback Data for Strategic Decision-Making:

For the past several years, CMS has conducted annual employee engagement surveys across all Illinois State agencies. In 2024, the survey received approximately a 20% response rate (approximately 1,150 responses) from IDOT employees. As part of the work of the BRC, IDOT published its own engagement survey in September 2025, which received a similar response rate across the Department (1,636 responses). IDOT should use these surveys as the initial foundation for prioritizing organizational improvements, establishing a framework to systematically capture, analyze, and act on employee feedback. The Department should increase survey visibility and participation by actively promoting its importance across all offices, districts, and bureaus, with leadership personally endorsing the survey and demonstrating commitment to acting on results.

10B) Implement Targeted Workplace Improvements:

Building on insights gathered from employee feedback, IDOT should develop a campaign to address employee concerns and enhance IDOT's competitiveness as an employer. Targeted improvements may include:

- **Continue the practice of establishing "satellite" offices in convenient and accessible locations:** IDOT has recently established district satellite offices in places like Champaign/Urbana to address workforce needs and the Department should continue this practice, where feasible, in areas of the state to reduce commute times for staff and expand its geographic capture as an employer. These satellite locations enable IDOT to tap into talent pools in larger employment centers while providing employees with more convenient work locations, improving work-life balance, and reducing commute times and VMT by IDOT employees.
- **Sustain reasonable flexible work options:** In line with State of Illinois personnel guidance, IDOT should maintain hybrid work capabilities and flexible scheduling arrangements, enabling the agency to compete effectively with private sector employers who offer similar flexibility. In doing so, clear standards and "in-person" expectations should be established so that employees are held accountable.
- **Understand compensation and benefits concerns:** Building on the BRC's labor market analysis, IDOT should regularly conduct market analyses and review benefit packages to stay competitive with private sector alternatives and other public agencies. IDOT should continue to work alongside CMS to assess and adjust salaries and benefits packages as necessary. Regular evaluations will help maintain competitive advantage and attract talent.

10C) Build IDOT's Brand Strength as an Employer:

As IDOT strengthens its internal culture through these initiatives, the Department should enhance both its internal and external communications capabilities to publicize these enhancements to enhance its brand as an employer. Success stories, improved employee satisfaction metrics, and concrete workplace enhancements can be recruitment tools that differentiate IDOT from competitors in both public and private sectors. IDOT should develop a campaign that actively promotes its career growth opportunities, competitive benefits packages, flexible work arrangements, and its meaningful public service mission to attract top talent in an increasingly competitive market. Additionally, IDOT should develop targeted messaging for different professional specializations—emphasizing engineering innovation for technical roles, public service impact for mission-driven candidates, and professional development opportunities for career-focused individuals.

This effort is most effective when multiple channels are used, including social media, professional networking platforms, university partnerships, and industry publications to reach potential candidates where they seek career information. IDOT should showcase employee testimonials, highlight innovative projects and technologies, and emphasize the long-term impact of transportation work on Illinois communities. IDOT should also participate more actively in career fairs, professional conferences, and educational institution partnerships to build relationships with emerging talent early in their career development.

11

Recommendation Detail:

Augment Internal Resources with Alternative Staffing, Automation, and External Partnerships

Recommended Actions for IDOT

11A) Apply Alternate Staffing Arrangements and Leverage External Resources:

Based on review of workforce needs, IDOT should apply alternate staffing arrangements and leverage external resources to alleviate immediate pinch-points. IDOT should utilize 75-day contract appointments and temporary positions for immediate placement of qualified professionals in critical shortage areas while permanent recruitment efforts ramp up. This approach provides rapid deployment of experienced talent without waiting for traditional hiring processes to conclude.

Additionally, IDOT should use external resources and contracted services to provide specialized expertise and surge capacity for priority functions without long-term commitments. For example, the Department should engage design and engineering firms to create a bank of letting-ready plans as an essential component of program delivery acceleration, ensuring that project pipelines remain full and construction schedules are maintained.

11B) Reduce Workload through Process Automation:

To the extent possible, IDOT should collaborate with DoIT to alleviate demand in core workload through automation of specific steps such as bid package creation, invoice processing, document management, timesheet approval, permit applications and renewals, and work zone reporting. By working with DoIT to implement technology solutions for routine, high-volume tasks, IDOT can redeploy internal staff to higher-value activities that require professional judgment and expertise, enhancing organizational capacity without adding permanent headcount. This dual approach of adding temporary capacity while automating processes can create operational relief as IDOT increases staffing levels, which may take more time.

12

Recommendation Detail:

Provide Operational IT Authority to IDOT to Enhance Service Levels

Recommended Actions for IDOT

12A) Improve IDOT and DoIT Collaboration:

IDOT should collaborate with DoIT to examine a range of options to enhance its day-to-day operations and overall efficiency in managing specialized technology needs. These options may include developing in-house capacity for routine IT and emergency repairs, partnering with DoIT to elevate service levels, or forming a more collaborative model where embedded.

Additionally, IDOT should collaborate with DoIT to enable automated workflows, particularly in document reviews and approval routing. These systems could potentially include AI-powered tools or other enabling technologies that provide greater capability and control than current spreadsheet-based tracking systems. IDOT should also implement systematic tracking of agreement review performance against established key performance indicators (KPIs), using this data to identify bottlenecks and continuously improve the process. Regular reporting on these metrics will provide accountability and transparency for both internal management and external stakeholders.

IDOT and DoIT should hold regular coordination meetings and shared strategic planning to align on enterprise initiatives, cybersecurity protocols, and integrated technology roadmaps. By balancing local autonomy with centralized oversight, IDOT can maintain and modernize essential tech infrastructure while improving responsiveness and service quality in its daily operations.

Launch Workforce Development Programs

Recommended Actions for IDOT

13A) Conduct Comprehensive Workforce Needs Assessment:

The BRC recommends that IDOT conduct a needs assessment that evaluates labor supply conditions and labor demand projections to provide an informed, data-led hypothesis that informs workforce planning efforts for both IDOT and its external industry partners. This assessment should be updated periodically to reflect changing market conditions, capital program priorities, and the Department's letting forecast.

IDOT should lead the needs assessment, in partnership with DCEO and with the input of other relevant public and private sector entities. This assessment should analyze the Bureau of Labor Statistics (BLS) data, industry trends, retirement projections, skills availability in the regional labor market, and emerging technology impacts on workforce requirements. In addition to quantitative analysis, the review process should also incorporate feedback from contractors, unions, and educational partners to validate workforce gap analysis and ensure that identified needs reflect actual market conditions rather than theoretical projections.

Components of a needs assessment involve:

- **Data and Resource Mapping:** Establish a baseline of available data sources, existing workforce programs, and resources in each region. This mapping exercise helps identify gaps in information and resources, setting the stage for comprehensive data collection in later phases.
- **Expectation Setting:** Clearly define the scope, timelines, deliverables, and evaluation criteria for the needs assessment process. Utilize insights from all team members so that expectations around regulatory compliance, diversity inclusion, and program impact are aligned across stakeholders.
- **Multi-Source Data Integration:** Utilize advanced analytics to aggregate data from diverse sources, including labor market statistics, industry trends, educational outcomes, and regional economic indicators.
- **Localized Needs Assessment:** Perform community-informed assessments considering specific entry barriers and challenges.
- **Sector-Specific Outreach:** Host discussions, surveys, and workshops to gather qualitative insights and identify sector-specific demands.

Additionally, IDOT should consider several key items within the assessment:

- **Infrastructure Projects and Capital Investments:** Identify upcoming labor-intensive initiatives that will drive regional workforce demand. Outline project timelines, specify required skill sets, and estimate workforce volume needs.
- **Skills Gap Analysis:** Compare current workforce capabilities with projected needs and highlight shortages in critical roles and competencies.

- **Barriers to Entry:** Examine challenges such as limited access to training and certification pathways and address hiring practices and other factors that hinder workforce participation.

- **Sustainable Employment & Retention Strategies:** Collaborate with industry partners to understand drivers of long-term workforce stability. Identify opportunities for career advancement, mentorship, and improved working conditions.

- **Competing Industries:** Identify the broader industries (e.g., technology, energy) which compete with transportation and identify tactics to mitigate those risks while promoting the attractiveness of transportation career pathways.

IDOT should also derive insight from its own internal workforce data, in relation to the positions that exist within the IDOT organization, the scope of those positions, and the workload that IDOT itself is charged with carrying out (distinct from the workload that IDOT outsources to consultants, contractors and their supply chains).

Data such as numbers of available positions and the duration that positions go unfilled, and the number of eligible applicants per position, provide relevant insight into the availability of talent in specific roles – as do projected and actual retirements by role, position and region. Using this data will help to inform IDOT's own strategic workforce planning approaches and align its internal workforce with its target operating model and organizational structure.

13B) Use Industry Partnerships to Validate Transportation Workforce Needs:

IDOT should also validate its identified workforce gaps by sharing labor market data with contractors and unions and gather insight on whether the initial analysis produced by the BRC is consistent with their on-the-ground experience.

For skilled trades where apprenticeships are a common training method, this validation session should include providing information on new entrants into relevant programs and discussing with unions if there should be more slots opened given upcoming demand. Regular data sharing and collaborative planning sessions with industry partners ensure that workforce development efforts address real capacity constraints rather than theoretical needs.

This joint approach aims to establish a transparent, mutually beneficial strategy between IDOT and industry partners. Through these discussions, IDOT can confirm its priority staffing needs while helping industry partners make informed decisions about their own workforce investments. This alignment is intended to help the public and private sector workforce development efforts complement each other, maximizing the effectiveness of limited training resources and creating a stronger overall talent pipeline for current and future Illinois transportation infrastructure programs and projects.

13C) Launch Workforce Development Programs and Initiatives:

IDOT should deliver workforce development programs by collaborating with partners to deliver specific training, education, and career development opportunities. For partnerships with educational institutions such as high schools, community colleges, and universities, the Department should first identify the specific bottleneck limiting the production of qualified students.

Educational partnerships typically face three common challenges requiring different solutions:

- **Financial barriers:** When relevant programs exist but students cannot afford enrollment, IDOT could provide tuition stipends and loan forgiveness to increase participation, particularly if tied to employment.
- **Capacity constraints:** When programs have demand but lack qualified faculty or necessary equipment, IDOT and/or other State agencies such as DCEO could provide support to expand institutional capacity.
- **Curriculum gaps:** When existing programs need transportation-specific content, IDOT should collaborate on curriculum modifications, provide professional mentors, and establish work-based learning opportunities.

These partnership approaches require sustained funding. Fortunately, IDOT can strategically use federal highway formula funding to support these investments. Under current federal rules, these sources for workforce and education initiatives do not require a local match. An increasing number of state DOTs are using these funds for partnerships with universities, community colleges, and high schools.

13D) Establish a Rotational Fellowship Program:

IDOT should consider a rotational fellowship program that trains individuals to be managers at IDOT. As noted above, IDOT has a need for managerial roles, and a program is needed to train incumbent workers as well as new workers who have some technical training and a desire to be managers. This fellowship program should be developed outside of the engineering pathway, building on the model of IDOT's legacy engineering fellowship programs—PACE, COOP, and Development and Training for Engineers (DATE)—but for non-engineering roles such as project management. This fellowship program could be for recent university or community college graduates depending on the education level needed.

By doing so, IDOT can establish a robust program to help attract talent, give participants a comprehensive understanding of departmental operations, and demonstrate organizational commitment to professional development. Features of the rotational fellowship program could include:

- Mentorship and coaching of entry-level staff by seasoned transportation professionals who demonstrate organizational values and serve as role models
- Clearly defined structure providing predictability in experience, qualifications, and pay scales over phased periods (e.g., four to six-month rotations)
- Performance-based advancement with clear expectations linked to bonuses and incremental pay increases
- Senior leadership exposure through special projects and involvement in events like transportation forums or industry conferences
- Peer cohort development creating communities where participants can connect and form lasting professional relationships
- Strong HR support throughout program duration for both participants and their managers
- Manager preparation including training for supervisors on program intent, goals, and expectations

Over time, this program can also support improved cross-departmental collaboration and reduce communication silos within and across IDOT.

13E) Develop Employee Growth Pathways and Retention Programs:

In addition to the programs and partnerships outlined above, the BRC recommends that the Department develop career development frameworks that provide advancement opportunities beyond traditional management tracks. IDOT should establish pathways that allow employees to progress in compensation and responsibility while remaining in their areas of expertise. These career paths should include both vertical advancement within specializations and lateral growth opportunities across different functional areas, supported by cross-training programs and professional development initiatives. This approach can help employees build rewarding long-term careers within IDOT regardless of their interest in supervisory responsibilities.

To support these career pathways, mentorship programs should be implemented to help bridge the experience gap between retiring IDOT employees and newer employees while creating structured career development opportunities. The mentorship component should focus on pairing seasoned employees with newer staff to facilitate knowledge transfer, skill development, and cultural integration within the organization. Given the number of retirement-eligible employees across IDOT, these knowledge transfer programs become critical for preserving institutional expertise and ensuring continuity in operations and project delivery capabilities.

13F) Provide Leadership Development Training Opportunities:

To complement these career advancement pathways, IDOT should provide leadership development training to build internal capacity for succession planning while demonstrating career advancement opportunities to ambitious employees. This training could leverage third-party resources from American Association of Highway and Transportation Officials (AASHTO), LinkedIn, and State universities.

The training should focus on developing the specific leadership competencies needed for transportation project management, regulatory compliance, and stakeholder engagement that characterize IDOT's operational environment. The program should target both current supervisors seeking to enhance their management capabilities and high-potential employees preparing for future leadership roles across various functional areas within the Department.

13G) Implement Performance Monitoring for Existing Training Programs:

As part of these efforts and to demonstrate a return on investment, IDOT should evaluate, monitor, and continuously improve its workforce development initiatives through data-driven decision making:

- **Evaluate and Enhance Programs:** IDOT should evaluate current workforce programs, particularly comparing HCCTP, which graduated 230 apprentices in 2023, with IllinoisWorks, which placed 500 apprentices in the same year. This analysis is useful to understand performance gaps driven by factors like stipends and support services and could be used to determine whether reallocating resources is more effective than maintaining current operations. Following Oregon DOT's model, IDOT should use federal highway formula funding to provide apprentice support services—hardship assistance, childcare, and other retention aids—particularly for underrepresented groups in critical trades, building immediate and long-term workforce capacity.

- **Develop Data Systems:** IDOT should track labor classifications and demographics across all projects, including monitoring apprentice participation rates by trade and whether pre-apprenticeship graduates work on IDOT projects. Included is tracking progression from apprenticeship through journey-level status, with attention to underrepresented groups and geographic patterns. IDOT should create regular DCEO-IDOT coordination to establish shared objectives and ensure graduates enter trades most essential for IDOT projects.

- **Implement Performance Monitoring:** The BRC recommends that IDOT develop feedback loops gathering input from participants, supervisors, and educational partners to track placement rates and program effectiveness. IDOT should regularly update workforce plans based on results, scaling successful approaches while modifying or discontinuing ineffective strategies. This approach helps to ensure workforce investments produce tangible benefits for project delivery while building industry capacity across Illinois transportation infrastructure. While IDOT has traditionally focused on highway construction career training, greater emphasis should be placed on the broader spectrum of transportation and sustainability careers- including rail, air, and port construction—as well as emerging fields such as fiber optics and sustainable infrastructure development.

Enhance HR Support Services

Recommended Actions for IDOT

14A) Update the Role of the HR Team:

The BRC recommends IDOT shifting HR from a traditional administrative support function to a strategic business partner, one that helps drive organizational improvement. This means expanding HR's scope beyond routine personnel transactions to encompass workforce planning, organizational development, change management, and strategic talent acquisition. This enhanced mandate requires active participation in executive decision-making, direct involvement in operational planning, and accountability for measurable workforce outcomes that directly support IDOT's mission delivery.

To enable this, HR should function as the central coordination point for workforce development initiatives, with authority and resources to drive organizational change. This requires executive support, coordination with CMS, and organizational positioning that enables HR to influence policy decisions, allocate resources, and hold departments accountable for workforce development outcomes. HR should maintain direct reporting relationships to senior leadership with clear authority to coordinate workforce initiatives, positioning HR as the organizational performance rather than a reactive service provider.

14B) Build Core Strategic Capabilities:

IDOT should build core strategic capabilities through targeted hiring of workforce planning specialists, change management professionals, communications specialists, and data analysts. This also includes the need for professional development for existing staff. These new capabilities are essential for managing complex workforce transformation initiatives that require specialized expertise beyond traditional HR functions. Investment in professional development for existing HR staff ensures continuity while building internal capacity for advanced workforce management practices.

14C) Augment Capacity Through Strategic Partnerships:

Where immediate capacity constraints exist, IDOT should augment the HR team through short-term/temporary hires or through focused outsourcing, such as use of specialized recruitment firms to build candidate pools, support initial screening, or provide short-term staffing. These partnerships provide immediate capacity while permanent HR capabilities are being developed, ensuring that workforce transformation initiatives can proceed without delay. Strategic outsourcing for specialized functions allows internal HR staff to focus on core strategic responsibilities while leveraging external expertise for specific tactical needs.

14D) Deploy Data and Technology Infrastructure:

IDOT should deploy comprehensive data and technology infrastructure including workforce analytics platforms, real-time performance dashboards, and integrated communication systems to enable evidence-based decision making and program monitoring. These tools provide the analytical foundation necessary to track progress across multiple workforce initiatives, identify emerging challenges, and make data-driven adjustments to strategies and tactics. Advanced analytics capabilities enable proactive workforce management that anticipates needs rather than simply responding to problems.

15

Recommendation Detail:

Expand IDOT's Supportive Services for Small Businesses

Recommended Actions for IDOT

15A) Coordinate the Establishment of Statewide SBE Certification Criteria:

Illinois has several policies and programs in place to support equity and small business participation, but these efforts do not specifically address the unique needs of the transportation industry. The dynamics of transportation—large-scale infrastructure projects, complex procurement systems, and the capital-intensive nature of the work—create barriers that are not fully covered by statewide, cross-sector initiatives. To supplement its existing DBE program, IDOT should adopt a Small Business Enterprise (SBE) track and consider an Emerging Small Business Enterprise (ESBE) option—creating race-neutral paths for newer and smaller firms, while maintaining full commitment to DBE.

SBE and ESBE are race-neutral designations grounded in objective business factors—primarily size (revenue/employee thresholds), independence/control, and basic compliance. An SBE is a firm that meets established small-business size limits and operates independently of a large parent. An ESBE is a smaller/earlier-stage firm that also meets independence tests but may have lower revenues, fewer employees, or shorter time-in-business, signaling it may benefit from targeted readiness support services. Both designations coexist (rather than replace) the DBE program and are intended to widen access for small and emerging firms regardless of owner demographics.

The SBE/ESBE certification should be implemented statewide to apply consistent rules so firms do not face different standards by district. An important element is that certified DBEs that meet SBE size/independence thresholds are automatically recognized as SBEs with no separate or burdensome application required.

Achieving a broader impact for SBE certification in Illinois depends on having multiple agencies—such as the Commission on Equity and Inclusion (CEI), Business Enterprise Program (BEP), the Illinois Tollway SBI, and the Capital Development Board—mutually recognize a single credential. IDOT should lead the effort by establishing formal reciprocity agreements or intergovernmental compacts so that one SBE certification is accepted for contracting across various public-sector entities.

Regardless of whether the certifying body is BEP, IL UCP, or a hybrid, the focus should be on governance and alignment and expanding existing systems e.g., Commitment to Diversity- (C2D) to support a new, race-neutral SBE certification, with multi-agency reciprocity to avoid duplicate certifications and reduce burden on small firms. This includes creating data-sharing protocols to exchange certification files, reducing paperwork for businesses, and harmonizing size-based eligibility criteria. This data integration, potentially through a centralized certification database or reporting system, allows participating agencies to track small business utilization across Illinois' procurement landscape. In practice, C2D will be updated to add an SBE designation, note reciprocity status (including multi-agency flags), provide a shared directory that agencies can search, and produce clear reports on SBE participation keeping one familiar system while supporting equitable contracting. Enforcing clear guidelines on data privacy and

interagency data handling upholds federal compliance and protects each agency's certification integrity.

By streamlining these reciprocity measures, IDOT can open the door for more small firms to compete effectively statewide and remove a key procedural barrier to equitable contracting.

The SBE program will be supplemental to—not a replacement for—DBE. DBE will continue and be revised as required by federal authorities (USDOT/FHWA/FTA) and any applicable court injunctions. A statewide SBE framework should align with existing programs—like the federal DBE program and the Tollway's SBI—and ensure that equity initiatives among agencies complement, rather than compete with, one another. To sustain this coordination, IDOT could form a "Statewide Certification Council," comprising stakeholders from all participating agencies. This council should meet regularly to harmonize eligibility metrics, share program updates, and address any cross-agency challenges that arise.

15B) Clarify SBI Eligibility Criteria (i.e., SBE Certification):

The SBI program is an IDOT contracting tool that creates tangible opportunities for small firms on projects (e.g., unbundled bids, sheltered markets, or small-purchase opportunities), so qualified firms can compete more effectively. The SBE certification feeds SBI by verifying which firms meet statewide size and independence standards; once certified, those firms are eligible for SBI opportunities and can be prioritized through SBI's project-level tools. In short, SBE identifies who qualifies, and SBI delivers the work.

Eligibility for IDOT's SBI is currently applied inconsistently; criteria are not always clear, and practices vary by district, sometimes overlapping with DBE requirements. IDOT should update SBI to confirm eligibility through the statewide SBE certification and implement a uniform application. To minimize burden on existing DBEs, DBE firms that meet SBE size/independence thresholds will be automatically recognized as SBEs via a simple attestation (not separate application) and will be eligible to participate in the SBI program.

In addition, IDOT should standardize and simplify participation for small businesses by adopting clear, user-friendly policies and procedures, including transparent forms, documentation checklists, appeals processes, and renewal requirements. IDOT should use uniform, statewide forms and processes to eliminate district-by-district variation and reduce paperwork for all small and emerging firms (including those qualifying under an ESBE designation)

15C) Seek Expansion of SBI Coverage to State and Federal Contracts:

While SBI is currently active for State-funded contracts, IDOT should collaborate with the FHWA, USDOT, FTA, and the FAA to explore avenues for broadening the program to extend to State and federal contracts.

15D) Establish EDA Designations & Contracting Instruments:

IDOT should collect and analyze socioeconomic data such as poverty rates, unemployment figures, and income thresholds to establish formal EDAs. To avoid duplication, IDOT should leverage the DCEO's existing "underserved area" designations as the baseline (consistent with the CTA Red Line precedent) formalize this via a Memorandum of Understanding (MOU) and then layer in transportation-specific criteria (e.g., contracting opportunity profiles) to target tools effectively. These designations create a clear roadmap for channeling contracting, training, and funding into high-need localities, expanding opportunities for small and emerging businesses that might otherwise face systemic barriers.

After defining EDAs, IDOT should implement contracting tools to encourage deeper participation from firms operating in these areas. For instance, IDOT can apply bid preferences, set-asides, or bonus evaluation points for EDA-based businesses bidding on State-funded projects, and deploy additional race-neutral tools such as unbundling and small-purchase set-asides aligned to local opportunity profiles.

Additionally, IDOT should coordinate with federal agencies, where permissible, to extend EDA-based strategies to federally funded contracts. In coordination with USDOT, IDOT should deploy only permissible race-neutral measures (e.g., unbundling, enhanced outreach/readiness windows) while avoiding impermissible geographic preferences.

The recommendation of an EDA program should supplement, not replace, IDOT's DBE program, adding race-neutral, place-based opportunities while reaffirming IDOT's continued commitment to DBE.

15E) Implement Operational Enablers to Support Program Delivery:

To effectively deliver the SBI, SBE/ESBE, and EDA programs, IDOT should implement operational enablers needed to increase capacity and efficiently manage the programs. This may include:

- Establishing robust outreach strategies that educate small businesses, particularly those in underserved or EDAs, about the advantages of the new SBE certification. This could include multilingual marketing, targeted social media campaigns, and partnerships with chambers of commerce, trade associations, and local development organizations.
- Creating tailored pathways for SBE/ESBEs by offering simplified entry into certification, targeted technical assistance, and early-stage capacity-building supports helping newer and smaller firms gain the experience and stability needed to successfully compete for transportation contracts.
- Developing data dashboards that monitor participation rates and equity outcomes. Periodic reporting will not only inform stakeholders but also encourage ongoing program improvements. Systematic compliance checks and routine audits by IDOT will ensure only qualified small firms remain certified—further protecting program integrity.
- Investing in dedicated staff to manage application intake, compliance oversight, and performance reviews
- Implementing digital resources—like an online portal with step-by-step guidance and FAQs—to simplify the process for both applicants and internal staff.

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Recommendation Detail:

Expand Race- and Gender-Neutral Small Business Development Programs

Recommended Actions for IDOT

16A) Enhance the Mentor-Protégé Program:

IDOT should re-activate and expand its Mentor-Protégé program. This program assists emerging and established businesses connect to share skills, discuss best practices, and ensure mutual growth. The Mentor-Protégé program also helps emerging DBEs learn to identify, pursue and manage IDOT contracts efficiently. Enhancing this program may include:

- Expanding eligibility to include SBEs and other firms participating in State-funded contracts, creating structured mentorship tracks tailored to different industries and levels of business maturity
- Requiring each pairing to operate under a formal agreement that defines the mentor's scope of support, specific timelines, and measurable deliverables
- Offering incentives—such as evaluation points or partial reimbursements—for prime contractors who participate in the program
- Tracking protégé outcomes through standardized KPIs, regular mentor and protégé reporting, and periodic program evaluations. This could include progress meetings between the mentor, protégé, and IDOT as well as quantitative results, such as skill development, contract awards, and revenue growth and qualitative feedback to inform continuous improvement
- Aligning this enhanced mentor-protégé program with its supportive services and SBI redesign, ensuring a cohesive small business ecosystem that fosters equitable opportunity and sustainable growth
- Hosting awards for successful mentor-protégé program participants, e.g. as part of broader industry events and annual award ceremonies, to highlight the program and encourage participation

16B) Expand Access to Capital for IDOT Small Business Partners:

IDOT should develop a holistic approach to expanding access to capital for small business partners. This may include:

- Establishing a contractor working-capital fund that offers short-term loans to help cover payroll and materials for small firms, particularly to cover the gap between prime and subcontractor payment cashflow timing
- Partnering with the Illinois Finance Authority (IFA) to launch a State surety bond guarantee program with IFA administering the guarantees and IDOT promoting program access to contractors

- Piloting the provision of mobilization advances (e.g., 5–10%) at contract start to further assist small businesses with upfront costs
- Enforcing prompt payment and timely retainage release by setting clear timeframes, such as requiring prime contractors to pay subcontractors within 14 days and by imposing interest penalties on primes for any delays
- Providing tailored financial coaching, technical assistance, and microloan partnerships with community lenders and Community Development Financial Institutions (CDFIs)
- Requiring capital planning training to be included within Mentor-Protégé agreements covering topics like bonding, forecasting, and invoicing to ensure new entrants gain vital financial management skills

To minimize conflict-of-interest risk and keep IDOT out of direct fund management while still expanding access to capital, the following partner-led models can deliver the same outcomes:

- **DCEO / IFA Transportation Capital Program:** Partner with DCEO (and/or the IFA) to run a transportation-focused working-capital/microloan program. IDOT sets eligibility signals and promotes access, while DCEO/IFA handle underwriting, servicing, and compliance.
- **IFA Surety Bond Guarantee:** Request that IFA administer a State surety bond guarantee for small contractors; IDOT aligns specs and outreach allowing firms to qualify while IFA manages risk.
- **CDFI Consortium "Marketplace":** Stand up a co-branded referral portal to a CDFI/lender consortium offering lines of credit tied to letting schedules and bundled coaching. The lenders handle all credit decisions and servicing, with IDOT limited to referrals and data-sharing MOUs.

16C) Expand Small Business Insurance and Bonding Assistance Program:

IDOT should establish a comprehensive bonding assistance program that provides small businesses with credit counseling, readiness assessments, and connections to licensed surety providers, while also implementing a State-backed guarantee fund administered in partnership with the IFA to shoulder part of the bonding requirements for qualified small firms. This may include:

- The provision of premium reimbursements
- Integrating bonding support within IDOT's broader supportive services
- Building a statewide referral network that unites surety agents, insurers, and financial institutions.
- Offering controlled insurance options such as a ROCIP, which consolidates insurance coverage under a single policy managed by the agency and extends it to multiple contractors and subcontractors across eligible projects over time. This approach not only creates cost savings and consistent coverage but also makes participation more accessible for small and emerging firms that struggle with high insurance costs
- Developing tracking tools to capture unmet bonding and insurance needs
- Allowing alternative bonding approaches such as waivers or risk-based criteria to accommodate firms that do not meet traditional surety standards

16D) Enhance Community Outreach Mechanisms:

IDOT should devise a centralized, agency-wide outreach plan that aligns with its small business and equity objectives, setting benchmarks and focusing on region-specific priorities. To reach underserved areas, IDOT should consider creating regional outreach liaisons or formal partnerships with local chambers and advocacy organizations, revamp its small business web pages, and develop accessible, multilingual promotional materials. Establish an SBE certification with revenue-based criteria to qualify firms for IDOT's SBI program

This may also include establishing an online hub that consolidates event listings, training opportunities, procurement details, and sign-up forms, while synchronizing outreach with project pipelines and existing supportive services. Additionally, this may include adopting tracking tools to capture outreach touchpoints, measuring participation trends, and assessing conversion rates enabling the agency to refine its tactics and ensure impactful business engagement. In short, BEP's efforts are statewide and cross-sector, while IDOT's hub and metrics will be tailored to transportation procurements and prequalification, with a focus on converting participation into bids and awards on IDOT projects, thereby complementing BEP and expanding access for all small and emerging firms.

Objective #2: Expand Workforce Capacity
Considerations for the General Assembly

Implementing many of the recommendations to IDOT to expand workforce capacity will require dedicated funding streams and revised statutory authority, which is outside of the Department's control. The BRC has identified the following factors for the ILGA to consider:

Authorize and Appropriate Funds for Strategic Workforce Expansion:
IDOT will need the support of the ILGA to provide the necessary budget appropriations to fund a phased workforce expansion to increase authorized headcount by 1,400 to 2,000 staff to reach an overall range of 6,400 to 7,000 employees by 2028. The proposed expansion should be implemented through a phased approach over multiple budget cycles.

Fund Transportation-Specific Workforce Development Programs:
Funding transportation-specific workforce development programs, similar to existing workforce development initiatives in other sectors like healthcare or teaching, is critical to attracting talent to transportation careers. This investment could include partnerships with educational institutions and industry organizations, competitive tuition assistance, loan forgiveness programs, and comprehensive workforce development initiatives.

Empower IDOT to Facilitate Financial Assistance to EDAs and SBEs:
Empowering IDOT to facilitate access to capital for small and emerging businesses helps emerging contractors overcome financial obstacles often encountered in public infrastructure projects. Creating a framework for low-interest loans, bonding assistance, and targeted insurance programs delivered by partner entities with IDOT serving as coordinator broadens competition, stimulates local economies, and ensures that state transportation investments yield equitable economic benefits across Illinois without IDOT directly lending or servicing loans.

Establish Statewide SBE Reciprocity and Data Sharing:
Encourage agencies to establish a standardized SBE credential is recognized wherever feasible through reciprocity agreements, such as including in CEI's BEP program, the Illinois Tollway's SBI, IDOT's SBI, and similar certification frameworks. This could include amending 5 ILCS 220 to encourage agencies to enter into intergovernmental agreements that facilitate a "unified certification" or reciprocal acceptance approach.

Provide SBI Authority and Alignment:
The BRC requests consideration of amendments to both 30 ILCS 575 (the Business Enterprise for Minorities, Women, and Persons with Disabilities Act) and 30 ILCS 500 (the Illinois Procurement Code) to embed a clear statutory basis for IDOT's SBI. Currently, IDOT's race-neutral small business program relies heavily on discretionary authority, with no single law conclusively specifying eligibility criteria or set-aside procedures. By explicitly incorporating the SBI into these statutes—establishing defined revenue or employee-size thresholds, simplified bid processes, and dedicated procurement targets - the State can better ensure that smaller firms have a fair chance to compete for IDOT contracts while maintaining transparent oversight.

Such legislative clarity also aligns Illinois with best practices in promoting a balanced mix of race-neutral and race-conscious approaches to vendor participation. A codified SBI program encourages broader competition, facilitates vendor growth, and offers clear guidelines for contractors who might not otherwise qualify under existing race-based or gender-based programs. Ultimately, strengthening IDOT's SBI through amendments to 30 ILCS 575 and 30 ILCS 500 helps foster equitable contracting opportunities, spur competition, and deliver more value to taxpayers.

Authorize EDA Designations:
Granting IDOT authority to designate EDAs and establish clear, data-driven criteria (e.g., poverty rates, income levels, unemployment figures) for these designations support targeted contract initiatives, improve coordination among agencies, and ensure that resources are directed toward communities most in need of economic development. Currently, there is no uniform statutory provision that empowers IDOT to set statewide definitions for EDAs and tie them directly to procurement preferences or equity programs. These changes authorize IDOT, via rulemaking, to set EDA criteria and apply permissible race-neutral tools (e.g., unbundling, small-purchase set-asides, evaluation credits) on State-funded procurement while preserving federal compliance (i.e., no geographic preferences on federally funded contracts).

Delegate Partial IT Authority to IDOT:
The ILGA should enact legislation clearly granting IDOT operational IT authority, while preserving DoIT's broader oversight role. This authority should allow IDOT to manage its day-to-day technology operations, make routine or emergency system purchases, and deploy specialized transportation software without unnecessary delays. At the same time, IDOT should comply with statewide IT standards, guidelines, and cybersecurity requirements set by DoIT. By codifying this balance in law, the ILGA enhances IDOT's ability to deliver transportation services more efficiently while maintaining consistent statewide IT governance.

Objective #3:

Maximize the Value of Investments

Current Situation

IDOT and other transportation system partners invest billions of dollars annually in the State's transportation system. These investments support a range of State and local goals and provide an opportunity to strengthen alignment of transportation system needs. Many investments are also restricted either by statute or practice within narrow funding silos. By better understanding those needs and increasing the flexibility on how funds can be used, IDOT and its partners can increase the alignment of their investments with overarching policy goals at both the State and local level.

Illinois has an extensive transportation system with approximately 300,000 lane miles of roadways across various jurisdictions, of which almost 10,000 are Interstate highways. These figures are higher than in any other state except for California and Texas. To support the existing transportation system, IDOT dedicates most of its funds to maintenance and preservation activities. However, even with the scale of resources dedicated to maintenance and preservation, IDOT analysis has shown that those funds will not be sufficient to achieve asset condition targets on State-owned roadways. Beyond asset preservation, there are also unfunded opportunities to enhance the existing transportation system through congestion management and to better support public transportation and intelligent transportation systems.

The scale and distribution of transportation investment in Illinois reflect the cumulative decisions of IDOT and thousands of other government agencies, each exercising some level of discretion within their respective jurisdictions. However, these investment decisions are often made within siloed categories, with considerations restricted to specific modes, geographies, or levels of government based on statutory requirements and agency practices. This fragmented approach can result in misalignments between funding allocation and actual transportation system needs, with revenue sources—such as motor vehicle registration fees and the MFT—not always aligned with the assets or investment requirements they support. Additionally, given the size of IDOT’s capital program and recent challenges in spending down the capital improvement fund balance, unallocated funding can be redirected towards other purposes, further limiting the ability to improve the condition of infrastructure.

The BRC’s recommendations address these challenges through several complementary strategies. First, IDOT should quantify statewide investment needs and update performance metrics to guide allocation decisions based on comprehensive data and alignment with State goals. Second, IDOT should expand flexibility in funding deployment - piloting cross-modal funding opportunities, increasing statewide project evaluation, and making additional funds available to local governments and transit agencies. Third, IDOT should collaborate with federal partners to implement policies that reduce administrative barriers, including expanded federal flexible match eligibility and systematic funding swap programs. Finally, IDOT should further prioritize maintenance and preservation investments and optimize existing infrastructure through policy changes, technological solutions, and modal connections before pursuing capacity expansions. Concurrent and complementary with these recommendations is a call for the ILGA to ensure that funding raised for transportation is protected, especially as funding flexibility is promoted across modes, regions, and levels of government.

Recommended Actions for IDOT

17A) Quantify Investment Needs:

Building on the TAMP, IDOT should lead the development, synthesis, and periodic updating of a statewide transportation system needs assessment that includes quantifying both the capital and operating costs of addressing those needs. The assessment should include both management of existing assets and additional capital and operating investments required to achieve unmet transportation system goals and reflect the needs of both the IDOT system and designated parts of the broader State transportation system.

The BRC recognizes that IDOT and other transportation agencies have developed similar inventories. As such, IDOT should identify gaps in these assessments by mode, geography, and level of government. The Commission recommends IDOT review and harmonize the base assumptions, timelines, and methodologies used in constituent needs assessments. In some cases, it may be appropriate for IDOT to provide technical or resource support to local jurisdictions that do not have the staff capacity or funding required to conduct a needs assessment related to their assets and/or transportation needs within their jurisdiction.

Any assessment should also have a sufficiently long timeline to capture high-complexity, high-cost projects that can require substantial pre-planning and identification of resources. These could include the management of existing assets (e.g., anticipated reconstruction of interstate highways or rail transit lines) and the identification of investments that could address State transportation objectives with additional transportation services or assets (e.g., upfront capital investments and ongoing operating subsidies to support new intercity passenger rail or transit services).

To facilitate decision-making, IDOT should identify a range of investment levels and assess how each level performs relative to goals. For example, this could follow the model of the IDOT TAMP, which identifies what asset condition targets could be reached at varying levels of investment. A similar approach could also be deployed for each State goal, (e.g., identifying the cost required to achieve specific modal or policy goals such as reducing transportation-related greenhouse gas emissions).

IDOT should update the needs assessment on a regular basis and could be done as a part of its regular LRTP process. The needs assessment should also be informed by robust public and local agency input. By following this process, IDOT will be able to ensure that investment decisions are guided by a full and accurate picture of statewide transportation needs.

17B) Update Metrics for Investment and Prioritization Decisions:

IDOT should update its existing performance measures and metrics to guide investment and prioritization decisions. Measures and metrics could be developed as part of the regular LRTP development process. They should also be informed by the comprehensive needs assessment conducted as recommended above.

Measures and metrics should reflect a combination of transportation system goals (e.g., asset management) and broader IDOT and State priorities. They should be consistent with federal requirements but should also include other topics to align with the priorities of Illinois. These could include equity (e.g., increasing the number of jobs accessible to low-income residents by both car and non-car modes), safety (e.g., achieving more aggressive reductions in fatalities and serious injuries on the transportation system), and climate (e.g., reducing transportation-system greenhouse gas emissions by a specified amount in alignment with statewide climate goals).

Measures and metrics should be selected based on whether consistent and granular data is available to evaluate progress. Measures and metrics should also be designed to maximize the applicability across modes, (e.g., by evaluating the throughput of people, rather than vehicles). Although IDOT uses some of the measures and metrics mentioned above in some steps of the programming process, there are opportunities to deploy them more systematically and impactfully.

Measures and metrics should inform the prioritization of funding at both overarching categories of investment (e.g., safety, asset management) and the individual project level (e.g., selecting a roadway to be reconstructed):

- At the category level, IDOT should consider establishing explicit overall statewide funding targets for categories of investment prior to making individual investment decisions. These targets could be advisory or impose a strict constraint, but in either case allow for more strategic investment and allow IDOT to make the case for additional investments if required, (e.g., to close the funding gap required to achieve asset condition targets). These targets should be informed by overall State and Departmental goals, recent trends on related goals, and assessments of the scale of funding required to achieve desired performance.

- At the project level, IDOT should incorporate any identified measures or metrics into project selection criteria for funds administered by the Department, including investments on IDOT facilities and those on facilities owned by other agencies supported by IDOT-administered grant programs.

IDOT should provide regular updates to the ILGA on the alignment of its programming decisions with the identified measures and metrics through the LRTP, MYP, and other established reporting documents. IDOT should also regularly revisit the measures and metrics to ensure they continue to align with State goals and priorities and identify additional areas where the performance-based approach can be applied within statewide transportation investment decisions.

Expand The Flexibility of Funding Uses

Recommended Actions for IDOT

18A) Expand Flexibility Across Modes:

IDOT already considers investments across modes for some programs, but there are opportunities to adopt more modally flexible investments across programs. When making investments, IDOT and other agencies should consider how investments in various modes (e.g., highways, transit, rail, active transportation) could achieve State goals both individually and together.

IDOT has already demonstrated its ability to consider investments across modes within specific programs such as the Competitive Freight Program. IDOT should build on the experience of these efforts with additional pools of funds that can be used to support investments that achieve a specific State goal, regardless of the mode. For example, IDOT could establish a pilot pool of cross-modal funding to support projects that align with goals such as reducing transportation-related greenhouse gas emissions, enhancing access to jobs, promoting transportation-efficient land use, and/or improving mobility options for low-income travelers.

In establishing these new multimodal funding opportunities, IDOT should leverage the needs assessment and metrics developed under Recommendation 17A. Those activities should inform both the amount of funding made available as well as the metrics by which projects will be selected.

Based on the results of these pilot funding programs, IDOT should consider expanding the applicability of this multimodal funding approach to additional areas of IDOT investment. In addition to increasing eligibility for goal-specific investments, IDOT could also explore the comprehensive model taken by states such as Virginia, which administers a statewide multimodal assessment and funding allocation approach. Funds should be made available to projects regardless of mode, so long as they align with state transportation needs and metrics identified through the State's long-range transportation planning process.

IDOT should also identify opportunities to encourage the more flexible use of transportation funding across modes by other transportation agencies, such as local governments that receive MFT allocations.

18B) Expand Flexibility Across Regions:

IDOT should increase the assessment of projects for potential investment on a statewide basis. An increase in statewide allocation assessments requires a shift from the current practice, under which the bulk of existing IDOT funds flow to individual Districts for decision-making, with individual project prioritizations made at the District level. District funding targets are informed by a combination of metrics and performance measures. Although some funds within the restricted program are reserved by IDOT for statewide investment, the preliminary allocation of funds to Districts limits flexibility and makes it more difficult to address high-complexity or high-cost transportation investment needs statewide.

IDOT should pilot this new approach by setting aside a portion of statewide transportation funds prior to allocations made to IDOT Districts. These funds should then be made available for projects statewide that align with one or more identified State goals (e.g., a pool of funds to support achieving asset condition targets or to address identified safety needs).

As with multimodal funding opportunities, the amount of funding and investment criteria used to select projects should be informed by the needs assessment process conducted under

Recommendation 17A. When combined with the longer planning horizon as outlined in Recommendation 5A, geographic flexibility allows for a concentration of funding in one region for a subset of the planning period, even if over the life of the planning horizon other investments balance what might otherwise be considered a disproportionate investment.

Based on the results of the pilot, IDOT should consider additional opportunities to evaluate investments on a statewide basis. The models employed by peer states such as Virginia and Texas often include a combination of statewide and region-specific funding allocations, indicating that there is a spectrum of approaches and that a statewide assessment may be appropriate for some categories while not required for others. Any new approach should balance the value of statewide evaluation with the need to maintain a minimum level of investment statewide, for example by ensuring state of good repair across all Districts according to the TAMP. IDOT should also assess and mitigate impacts on specific communities of concern, such as by ensuring continued investment in communities facing economic hardship where State funding support could be a catalyst for improvement.

18C) Expand Flexibility Across State and Local Government:

IDOT should make additional funds eligible for allocation to other levels of government—such as municipalities, counties, transit authorities, or other entities—under a process that evaluates discretionary enhancements to the IDOT system against proposed investments made by other agencies for alignment with State goals. As directed by the ILGA, IDOT has already made a pilot pool of funding available for multiple levels of government through a $400 million call for projects in 2025. Based on the results of that initiative and with authorization from the ILGA, IDOT could consider repeating and potentially increasing the size of such a pool of funds in future years.

This could exclude investments required to achieve IDOT priorities such as asset condition targets but include investments to support goals such as reducing transportation system greenhouse gas emissions, improving safety, or enhancing access to jobs. This proposal could be pursued in coordination with the pilot programs outlined in the multimodal and geographic flexibility Recommendations 18A and 18B discussed above. Any expansions to this funding eligibility need to balance the needs of the existing IDOT system; however, if additional needs are identified beyond the available funding, that could facilitate future discussions related to transportation system revenues.

IDOT could also increase the flexibility of existing funds that are made available to local governments. In coordination with the Transportation Funding Coordination Committee (see Recommendation 25A), IDOT should consider reforms that expand potentially eligible uses for funds that are currently directed through the local program but are restricted toward specific funding categories. By making additional funding available to local governments, IDOT has an opportunity to incentivize continued investment that aligns with statewide policy priorities. For example, as a condition of receiving funds, IDOT could require that local governments meet “maintenance of effort” requirements and that State funds are not being used to merely offset reduced local funding. These conditions complement the recommendation for greater alignment on goal setting between State and local governments noted in Recommendation 18B, as well as support and empower local agencies to accelerate project delivery and leverage available funding to deliver desired outcomes.

IDOT should also account for the variable levels of fiscal and staff capacity in local governments and ensure that any new State funding is not disproportionately leveraged by high-capacity jurisdictions. To mitigate this concern, IDOT should provide technical assistance and consider adjusted requirements (e.g., scale of local funding required) for low-capacity jurisdictions, such as by building on the model employed in the Illinois Transportation Enhancement Program.

Recommended Actions for IDOT

19A) Implement Flexible Federal Match Policies:

IDOT should initiate discussions with the FHWA and the FTA to explore potential changes to Federal Flexible Match (FFM) processes and identify corresponding compliance requirements that enable expanded program flexibility. FFM is a policy mechanism that allows certain eligible costs to count toward the local match requirements for federally funded projects, reducing the financial burden on local agencies while maintaining federal oversight standards. Since FHWA approval will be necessary to expand FFM eligibility, these early conversations will be critical. A primary topic of these discussions must be addressing the federal regulation that often requires engineering work on federal-aid projects to be performed by public employees. Given that most local agencies rely on private consultants for this work, IDOT must seek clarity or a waiver on this rule to ensure that locally funded consultant costs are considered eligible for federal credit. Understanding these parameters is essential to developing compliant policy frameworks that serve Illinois' infrastructure delivery needs

To illustrate the potential benefits of expanded FFM policies, consider a hypothetical project where a city wants to install a roundabout, requiring $500,000 for preliminary engineering (Phase 1), $300,000 for final design (Phase 2), and $4 million for construction (Phase 3). Under current policies, if the city chooses to pay 100% of the Phase 1 and Phase 2 costs ($800,000) with local funds to speed the project timeline rather than seeking federal funds through IDOT, this $800,000 investment does not count toward the city's matching funds for Phase 3. Consequently, the city is still required to fund an additional $800,000 (20% of construction costs) for the federal match requirement. This policy structure forces cities to either extend project delivery timelines by using federal funds for Phases 1 and 2 (as depicted in scenario 1 below) or carry the financial burden of self-funding early phases in addition to providing the full local match for Phase 3 (as depicted in scenario 2 below). While land acquisition costs and in-kind services are counted toward a local government's expected contribution to Phase 3 costs, self-funded Phase 1 or Phase 2 costs currently do not receive similar credit, creating a disincentive for local agencies to expedite projects through early self-funding.

Figure 11: Hypothetical Project with FFM Funding Configurations

		Scenario 1: Federal funds used in each phase		Scenario 2: Local funds for phase 1 & 2, without FFM		Scenario 3: Local funds for phase 1 & 2, with FFM	
Phase	**Total**	**Local**	**Federal**	**Local**	**Federal**	**Local**	**Federal**
Phase 1 (preliminary engineering)	$500,000	$100,000	$400,000	$500,000	$0	$500,000	$0
Phase 2 (final design)	$300,000	$60,000	$240,000	$300,000	$0	$300,000	$0
Phase 3 (construction)	$4M	$800,000	$3.2M	$800,000	$3.2M	$0	$4M
Total	**$4.8M**	**$960,000**	**$3.84M**	**$1.6M**	**$3.2M**	**$800,000**	**$4M**

If permitted by FHWA, IDOT should expand FFM eligibility to allow local spending from preliminary engineering (Phase 1) and final design (Phase 2) to count toward local match requirements for construction (Phase 3) (as depicted in scenario 3). This approach aligns with policies successfully implemented in other states, such as Kansas[53], demonstrating that federal agencies can accommodate flexible match arrangements when properly structured. The policy change recognizes the value of local investment in project advancement and eliminates the current financial penalty that local agencies face when they choose to expedite projects through self-funding. However, it is important to note that local agencies still have to provide a match in Phase 3 if their investment in Phases 1 and 2 does not meet the required 20% threshold.

Throughout this process, IDOT should maintain coordination with MPOs, IDOT Planning & Programming, and local agencies to ensure continued compliance with the LRTP and TIP requirements. This collaborative approach will help identify potential implementation challenges early and ensure that expanded FFM policies integrate seamlessly with existing planning and programming frameworks.

To validate the effectiveness of updated FFM policies before full implementation, IDOT should identify and develop pilot projects that can test the new approach under real-world conditions. These pilots should include diverse project types and local agency characteristics to ensure the policy works effectively across different scenarios and provides valuable data for program refinement before broader rollout.

[53] Kansas DOT Federal Fund Exchange Program

19B) Establish Surface Transportation Program (STP) / State Funding Swap Programs:

IDOT should develop a systematic program to exchange federal STP dollars for State MFT funds at a 0.9:1 ratio, reflecting the reduced administrative requirements associated with State funding. This exchange ratio accounts for the fundamental difference in funding structures: STP funds require a 20% local match, whereas MFT funds do not require matching contributions from local agencies. The 0.9:1 ratio helps address the difference in total project dollars available when the federal match element is removed while providing local agencies with administrative savings that justify the reduced funding level.

To maintain project feasibility while implementing the swap program, IDOT should adjust local match requirements to offset the reduced State contribution, ensuring that total project funding remains adequate for successful completion. This approach enables local agencies to access State funding processes while maintaining realistic project budgets that reflect the true cost of infrastructure work.

The swap program eliminates federal compliance requirements by substituting state funding that does not require IDOT design review for local street projects. This substitution removes layers of federal oversight that are often disproportionate to project complexity, allowing routine infrastructure work to proceed through more expedited State processes while reserving federal oversight for projects that genuinely benefit from comprehensive federal standards and review. Similar to FFM, IDOT should maintain coordination with MPOs to ensure projects using the MFT / STP swap are consistent with regional goals and are accurately recorded in the TIP. Before implementing the swap program, IDOT should conduct thorough research of MFT guidelines and validate the proposed approach with the FHWA region to ensure program feasibility and compliance with existing federal funding frameworks. This validation process should address potential concerns about federal funding stewardship and demonstrate that the swap program enhances overall infrastructure delivery efficiency while maintaining appropriate accountability for public resources.

Recommendation Detail:

20 Prioritize Funding Improvements to Existing Assets

Recommended Actions for IDOT

20A) Further Increase Prioritization of Maintenance and Preservation:

IDOT should prioritize funding asset maintenance and preservation prior to considering other investments, such as capacity expansion. IDOT already directs a large majority of its resources toward these goals; however, as noted above, even with that focus, a backlog of asset management investment needs remains on the IDOT system, as well as on other parts of the State transportation system.

Increasing maintenance and preservation investments does not necessarily preclude investments that align with other goals. However, it is important to align the long-term costs of maintaining the transportation system with the revenues available to fund those investments. Deferring maintenance and preservation activities creates a growing backlog that eventually needs to be addressed, increasing the long-term life cycle cost of transportation system assets. A simple repair left unaddressed today may become a complex and expensive asset replacement project two years from now.

By contrast, routine maintenance, including prioritizing the full funding of the enterprise asset management system, will reduce overall facility life cycle costs by extending the useful life of IDOT assets. It will also reduce societal costs, e.g., due to increased vehicle wear and tear from potholes and poor pavements. A similar approach yields similar benefits for other parts of the State's transportation system. For example, deferred acquisitions of buses owned by public transportation agencies can increase operating costs, as older buses burn more costly fuel and break down more frequently than newer and more modern vehicles.

A comprehensive prioritization of maintenance and preservation could also prompt IDOT to consider opportunities to reduce the long-term liabilities posed by its assets. For example, in some cases, it may be appropriate to consider a "road diet" on IDOT-owned roads. In addition to aligning with safety and multimodal mobility goals, these projects can reduce the overall amount of pavement, which can reduce IDOT's life cycle costs by eliminating responsibilities related to both operations (e.g., snow clearance) and long-term asset management (e.g., re-paving and reconstruction).

20B) Optimize Existing Infrastructure Before Considering Expansion:

While maintenance and preservation will continue to represent the bulk of IDOT's spending, there will also continue to be interest in investments that address new and different transportation challenges in alignment with broader State goals. Furthermore, as IDOT and other agencies are able to address and reduce the backlog of transportation system investments over time, there may be additional opportunities to direct resources toward those challenges.

When considering any enhancement or addition to the existing transportation system, IDOT and its partner agencies should consider and prioritize improvements that do *not* add capacity as the primary approach. These could include:

- **Policy changes,** including demand management strategies like roadway pricing and the adoption of other mechanisms that incentivize residents to reduce overall vehicle miles traveled (e.g., land use changes).
- **Technological solutions,** including Intelligent Transportation Systems (ITS) strategies like coordinated signals and real-time traffic systems management.
- **Connections with other modes,** such as providing dedicated bus lanes and/or bike lanes within existing facilities or offering increased service on existing public transportation and intercity passenger rail corridors.

As noted above, any new capacity will impose long-term maintenance and operational obligations on the State. There may be circumstances in which those obligations are warranted, e.g., due to major shifts in land use, population, or employment. However, given the State's mature roadway network and relatively slow overall population growth, in many cases, other strategies may be more financially feasible and align with broader State goals and objectives. Thus, before committing to expanding capacity, IDOT should demonstrate that no other solution is able to address the identified objective of the project.

IDOT should also consider how to leverage its existing and proposed funding allocation authority to align with this recommendation. For example, IDOT already has the authority to "flex" federal funds received through several funding programs (e.g., the National Highway Performance Program) to support investments in areas such as public transportation. IDOT could leverage this authority, in conjunction with the prioritization of non-capacity investments, to support investments that optimize existing roads and/or enhance the reliability and attractiveness of alternative modes.

Objective #3: Maximize the Value of Investments
Considerations for the General Assembly

Maximizing the value of State investments requires coordination among IDOT and local government partners. In addition to the above recommendations for IDOT, the BRC has also identified several factors including restrictions on funding sources that are beyond the Department's control. These items are presented below for consideration by the ILGA:

Investment Needs Assessment:

Undertaking a comprehensive assessment of transportation investment needs across the state enables more accurate data collection on conditions, costs, and project readiness. This provides insight into the baseline funding required to maintain existing assets and the additional investment needed to advance statewide priorities. Extending such an assessment to include local governments and other partners whose networks are critical to system performance provides a more complete understanding of the State's transportation investment needs.

Support Greater Funding Flexibility for Transportation:

The BRC believes ILGA should give consideration to funding allocation revisions to promote flexibility across modes, regions, and levels of government. While IDOT can implement elements of a more flexible funding approach under existing statutory authorities, there are factors beyond its control that impact the allocation of funds. These revisions include:

- Increasing multimodal or local government funding allocations, such as consolidating both the Construction Account Fund and the Road Fund into a single and more broadly applicable Transportation Fund. While still subject to constitutional "lockbox" provisions, money in the Transportation Fund could be eligible for use on transportation projects regardless of mode, geography, or level of government throughout Illinois.
- Modifying funding allocation formulas to better align with the identified transportation system needs and State goals. More than half of existing MFT revenues flow to local governments, doing so through a statutory formula developed from the 1920s through the 1980s and codified in 1990. The present allocations do not necessarily reflect transportation system needs, with funding allocated through a combination of flat percentages and allocations based on population, motor vehicle registration fees collected, and/or road mileage. Adjustments to these statutory formulas could be made more dynamic and allow for better alignment of funding with evolving needs as identified through the assessment process conducted under Recommendation 17A.
- Assessing the allocation of new revenue sources in relation to existing funding sources. For example, the EV registration fee surcharge enacted in Rebuild Illinois has helped to offset the lost revenue due to increased vehicle fuel economy and electrification. However, this fee specifically supports IDOT, while the eroded MFT revenue was split between State and local government agencies. New revenues should be designed to allow flexibility and avoid distortionary impacts on funding allocations over time.
- Limiting the number and size of legislatively specified projects. Large investments have been set aside for legislatively specified projects that are not yet ready for implementation, restricting the use of funds that could otherwise be directed to address State priorities. Funding allocations that support a category of projects, as was done in Rebuild Illinois for programs such as CREATE, as well as transit investments to be allocated by the RTA (in the Chicago region) and IDOT (in the rest

of Illinois) provides greater flexibility for IDOT and other transportation agencies flexibility to adjust their programs in response to shifts in the funding landscape and project readiness.

Adjust Static Formulas to be Flexible and Responsive to Transportation System Needs:
ILGA should consider amending statutes that dictate the distribution of funds through rigid, static formulas. Specifically, the ILGA should review the allocation formulas for Motor Fuel Tax (MFT) distributions to local governments and mandated geographic splits in the capital program. These formulas often rely on outdated data and restrict the ability to fund projects based on current, data-driven needs. The General Assembly is asked to consider granting IDOT greater flexibility by creating discretionary, needs-based grant programs or by updating the formulas themselves to incorporate performance metrics such as asset condition, safety, and economic impact.

Enhance accountability through regular reporting:
IDOT reports to the ILGA on the allocation of funds across modes, geographies, and levels of government should inform future statutory changes to ensure State transportation funds are aligned with State priorities.

Authorize IDOT to Credit Local Spending Towards Federal Match:
Enabling IDOT to credit local agency spending on preliminary engineering and final design phases toward federal match requirements for construction phases will enable local agencies to accelerate project delivery through strategic self-funding without facing financial penalties for their initiative.

Authorize IDOT to Exchange Federal STP for MFT Funds:
Authorizing IDOT to exchange federal Surface Transportation Program dollars for State MFT funds at a 0.9:1 ratio enables local agencies to access State funding for routine projects. Consideration should be made for appropriate additional MFT funds to support the exchange program and establish clear criteria for project eligibility.

Support Alignment of Measures and Metrics with IDOT Investment Decisions:
IDOT continues its efforts to strengthen the connection between performance measures and metrics established in the LRTP and the agency's investment decisions. Clarifying reporting requirements under 20 ILCS 2705-200, in coordination with IDOT and the Transportation Funding Coordination Committee, helps support this effort (see Recommendation 25A).

Objective #4:

Drive Sustainable Outcomes

Current Situation

Illinois stands at a pivotal point in addressing climate change and building resilient infrastructure. IDOT has initiated multiple sustainability measures, but these efforts are fragmented across districts and bureaus and will benefit from a unified and coordinated framework measurable goals with dedicated resources. Many peer DOTs have developed sustainability programs that incorporate clear definitions, measurable metrics, specific goals, and dedicated resources, providing examples which IDOT can use to implement a programmatic approach. Massachusetts DOT has implemented a Sustainability and Resilience Program focusing on environmentally responsible practices and emphasizes reducing GHG emissions, promoting clean energy and electric vehicles, enhancing public transit, and creating a resilient infrastructure pursuant to climate change impacts. The Maryland DOT has implemented a sustainability program guided by policies and strategic goals which integrate sustainable practices into planning, design, construction, and operations.

Mitigating GHG emissions is critical to achieving sustainable outcomes as transportation remains Illinois' largest source of GHG since the 1970s. IDOT has secured Federal NEVI funding for EV infrastructure but lacks sustained funding for long-term decarbonization. Several states, including California, Colorado, and Washington, have implemented alternative-fuel incentives and robust active transportation programs with multi-pronged strategies including emissions reduction targets, expanded mass transit, alternative-fuel incentives, and robust active transportation programs. While mitigation efforts reduce GHG emissions to slow future climate change, adaptation is essential to address impacts such as flooding, increased storm intensity, and heat which can disrupt transportation assets and infrastructure. IDOT's 2017 Climate Risk Assessment primarily focuses on highways, but a broader approach is needed to include all transportation modes for comprehensive resilience planning. Additionally, expanding design and engineering processes is crucial to implement the risk assessment findings effectively, paving the way for integrating climate risk specifications into BDE manuals and incorporating them into planning and operations. The Texas Department of Transportation offers an example of how adaptation can be embedded in a comprehensive Statewide Transportation Resilience Plan which addresses vulnerabilities such as inland flooding.[54]

A final and essential component of sustainable outcomes is community resilience, which ensures that benefits of a sustainable transportation system (e.g., cleaner air, safer mobility, and equitable access) are shared across communities, especially those most vulnerable to climate impacts. For major projects, IDOT conducts Community Impact Assessments to gauge effects (e.g., forced relocations) and implements active community engagement programs emphasizing collaboration with underserved or low-income areas, aligning these efforts with environmental justice goals. However, current approaches only partially integrate equity and localized resilience needs, limiting IDOT's ability to ensure sustainable mobility benefits are equitably distributed across vulnerable populations. By strengthening IDOT's foundational components, advancing mitigation strategies, embedding climate adaptation into design and operations, and prioritizing resilience, IDOT can deliver a transportation system that is sustainable, equitable, and prepared to meet the challenges of a changing climate.

[54] Texas Department of Transportation, Statewide Transportation Resilience Plan

21

Recommendation Detail:

Implement Foundational Components for a Sustainability Program

Recommended Actions for IDOT

21A) Organize Staff to Lead and Support IDOT's Sustainability Program:

The BRC believes IDOT needs to develop a central function to lead strategic planning, management, implementation, coordination, and performance tracking for IDOT's sustainability program and related initiatives. Organizing for sustainability may include setting sustainability goals, aligning performance metrics, and synchronizing funding priorities to ensure sustainability and resilience considerations are fully integrated into planning, design, operations, and stakeholder engagement.

As a part of this function, IDOT should consider designating a sustainability lead or executive sponsor to elevate sustainability and drive cross-departmental support. To anchor these efforts throughout the organization, IDOT should consider embedding dedicated sustainability roles within key units (e.g., Design, Materials, Operations, Planning and Programming, districts, and IDOT's Communication Team) to lead the implementation of the sustainability program. Finally, and as appropriate, IDOT may need additional staff to increase IDOT's capacity to manage and implement a more comprehensive sustainability program.

IDOT should also seek to cultivate a workplace culture where every employee recognizes their role in promoting sustainability and strengthening recruitment and retention of sustainability-focused professionals. In line with other BRC recommendations, workforce development may include establishing or providing access to third-party training programs to equip staff with up-to-date knowledge of climate mitigation, resilience, and equitable service delivery. This culture can also include providing staff access to formal channels to propose or volunteer for sustainability initiatives (e.g., "green ideas" submission platform, periodic "innovation labs" or contests). Additionally, offering sustainability career pathways, mentorships, or specialized certifications can ex and innovation in sustainability.

21B) Adopt Formal Principles to Guide the Sustainability Program:

By clarifying the scope and intent of sustainability, IDOT can unify staff around shared objectives, facilitate decision-making, and provide a clear foundation for developing performance metrics and funding strategies that align with today's urgent environmental and social challenges. As such, IDOT should update its formal definition of sustainability by integrating climate mitigation, adaptation, and community resilience as core pillars of the Department's work. An example of an updated definition is provided below:

> ***To build, operate, and maintain a sustainable multi-modal transportation system, IDOT will strive to:***
>
> - ***Mitigate Emissions:*** *Reduce or eliminate carbon emissions to reverse climate change;*
> - ***Adapt to Impacts:*** *Preserve and enhance mobility in the face of increasing climate impacts; and*
> - ***Advance Community Resilience:*** *Ensure that benefits from safer, cleaner, and more accessible mobility are equitably distributed.*

In formalizing the definition, IDOT should also adopt a recognized sustainability framework, such as guidelines from AASHTO or the Institute for Sustainable Infrastructure's Envision[55], to provide a standardized, holistic method for evaluating and guiding sustainability initiatives.

21C) Integrate Sustainability Goals in Planning and Operations:

IDOT should translate the statewide sustainability goals set by ILGA, such as reducing VMT or reducing carbon emissions, in its own policies, programs, processes, and plans throughout the Department. This may include updating the LRTP, modal strategies, construction manuals, asset management plans, programming decision metrics (i.e., MYP), ITS plans, and design manuals to incorporate sustainability principles.

IDOT should develop a robust data and reporting system that measures and tracks progress toward goals (e.g., GHG emissions reduction targets, zero-emission vehicle adoption) and facilitates data sharing across State agencies to support the identification, deployment, and monitoring of sustainability initiatives. A data and reporting system should include public-facing dashboards and consistent updates to IDOT's website and annual sustainability reports. The BRC recommends conducting independent third-party evaluations and uncovering innovative strategies, collaboration with universities or NGOs.

21D) Develop a Funding Plan for Sustainability:

IDOT should systematically assess and forecast total funding required to implement the Department's sustainability program and begin allocating necessary funds as appropriate, including working with GOMB and ILGA to obtain new funding. This assessment should include analysis and findings from the carbon pricing study the BRC recommends in Objective #5 (see Recommendation 25G). Initial analysis should focus on the most urgent mitigation, adaptation, and community resilience goals. Regular reviews of progress on sustainability efforts are recommended, and findings should be used to refine future funding requests and guide strategic investment decisions.

21E) Expand Stakeholder Engagement and External Partnerships:

IDOT should expand its stakeholder engagement strategy to ensure that community resilience considerations are meaningfully incorporated into every project phase and to support delivery of the Department's sustainability program. Specific engagement needs include:

- Strengthening inter-agency collaboration by working closely with the IEPA and the DCEO to align broader climate and environmental justice objectives, including policies for transition support, enforcement, community protection, incentives and funding.
- Developing stronger collaboration among local governments, MPOs, tribal nations, and the public, ensuring that plans reflect local realities and community priorities.
- Expanding inter-agency partnerships with environmental organizations, public health departments, and other relevant specialists to allow IDOT to tap into broader expertise and promote consistency in initiatives across different regions.
- Establishing advisory or working groups including external experts to foster an inclusive planning environment where diverse voices and leading practices guide equitable statewide policies.
- Pursuing active partnerships with research institutions and nonprofit organizations, such as the Little Village Environmental Justice Organization, leveraging their insights and capacity for data analysis, innovation, and community outreach.

[55] Institute for Sustainable Infrastructure's Envision

22

Recommendation Detail:

Implement Climate Mitigation Measures to Reduce GHG Emissions

Recommended Actions for IDOT

22A) Update Design Specifications for Low Carbon Materials:

IDOT should revise its design specifications and technical guidance to accommodate low-carbon construction materials. This may include leveraging funding from IDOT's Low Carbon materials Grant from FHWA to prioritize innovations such as carbon-sequestering concretes, sustainable asphalt mixes, and recycled or reclaimed aggregates. By embedding these standards in project manuals and bid documents, IDOT can incentivize contractors to adopt climate-friendly building methods, reduce the overall carbon footprint of infrastructure projects, and ensure Illinois is aligned with emerging best practices. To validate and refine specifications, IDOT should employ pilot projects, regular performance evaluations, and transparent reporting.

22B) Expand EV Charging Infrastructure & Monitor Alternative Fuels:

The BRC recognizes IDOT and the State of Illinois' significant efforts to support EV adoption and alternative fuels. The Reimagining Energy and Vehicles (REV) Act has been and continues to be paramount in positioning Illinois as a leader, and this Commission believes IDOT should continue to install additional EV charging infrastructure across the state, prioritizing rural and underserved regions lacking sufficient charger coverage. Expansion should include installing more DC fast chargers under the NEVI plan, streamlining IDOT's internal approvals to expedite construction and continue incorporating an equitable approach through data sets, and targeted community planning. To maintain an equitable approach, IDOT should leverage EDAs data and include local input—especially from low-income or rural residents—through targeted outreach and community planning sessions.

In addition, IDOT should explore a variety of external funding streams and potential partnerships with private entities to further ease cost barriers, speed deployment, and promote EV ownership.

IDOT should also continue to track ongoing research and readiness timelines for other fuel technologies, such as hydrogen, so it can adapt long-term infrastructure plans accordingly and integrate future advancements seamlessly into the State's transportation network.

22C) Implement IDOT's Active Transportation Plan:

IDOT should finalize and implement its Active Transportation Plan (ATP) to continue and enhance efforts to build first-mile/last-mile connections, allow bike parking, bike share docks, provide e-scooter charging at major stations, accessible sidewalks, and encourage regional coordination to enable seamless multimodal travel. These efforts may require identifying funding and implementing policies to move the ATP to actionable measures across the state for walking, biking, and micro-transit initiatives.

IDOT should continue to update this plan on a recurring basis, working with a broad range of community groups and MPOs throughout Illinois to identify areas where active transport measures are needed.

IDOT should also collaborate with local public agencies and MPOs to develop and implement their active transportation plans, develop a statewide dashboard tracking active transportation infrastructure gaps, crash trends, and equity metrics, and leverage data to evaluate whether IDOT's goals are being met.

22D) Expand IDOT's Services for Transit:

IDOT should actively collaborate with local jurisdictions and transit agencies to transform State roadways into transit-priority corridors. Expansion of transit services includes identifying and addressing key barriers to bus service, such as congestion "hot spots," inadequate passenger infrastructure, or lack of signal priority, while setting up BRT lanes, dedicated bus-only rights-of-way, and signal priority. By integrating beneficial design features early in project screening, IDOT can speed travel times, strengthen reliability, and foster TOD.

IDOT should also develop increased capabilities for technical assistance to transit agencies and local jurisdictions. Such assistance may include allocating resources for on-the-ground technical guidance, community engagement support, and broader transit advocacy to ensure that local voices shape decision-making and that resulting improvements foster a more connected, people-centered, and future-ready transit landscape.

IDOT should also seek to partner with transit operators to pursue equitable transit solutions such as:

- Piloting and scaling no- or reduced-fare transit programs for youth, seniors, students, and low-income populations.
- Establishing "regional equity zones" to direct resources to historically underserved communities including expansion of last-mile solutions (e.g., micro-transit, demand-responsive shuttles, community vans) and accessible vehicles.

In parallel, IDOT should combine ITS with transit improvements to enable real-time passenger information, signal priority for buses, and integrated fare systems across CTA, Metra, Pace, and rural transit agencies. Exploring TOD. in underserved areas can further extend ITS benefits beyond automobile travel, fostering more equitable, multimodal mobility. Finally, ITS should be prioritized for vulnerable road users (e.g., pedestrians and cyclists) by incorporating features like pedestrian detection at intersections and bike/ped counters to inform safer signal timing and street design. Additionally, IDOT should identify resources to support implementation of its public transportation plan, Next Move Illinois, which is currently under development and includes intercity rail as part of the plan.

22E) Redevelop IDOT Land to Support GHG Goals:

IDOT should continue and expand efforts to implement alternative uses of IDOT-owned land and assets. Examples include:

- **Renewable Energy Projects:** Where consistent with Federal legislation and FHWA policy, leasing or dedicating underutilized land (e.g., highway rights-of-way) for solar farms or wind energy projects to reduce reliance on fossil fuels and lower transportation

sector emissions. In addition, IDOT could partner with community energy co-ops or programs that prioritize low-income areas for energy access or bill reductions.

- **Green Infrastructure and Urban Forestry:** Planting native vegetation, trees, and pollinator habitats along roadsides and medians to improve air quality, reduce heat island effect, manage stormwater, and increase biodiversity. This may also include focusing greening efforts in historically underserved urban areas lacking green space.
- **Affordable Housing and Transit-Oriented Development:** Exploring the feasibility of transferring or leasing surplus land near transit corridors to developers who commit to affordable, mixed-use housing to reduce car dependency and urban sprawl, increase access to transit for low-income communities, and improve job access and quality of life.
- **Active Transportation Corridors:** Repurposing unused land along rail lines, highways, or rivers for bike and pedestrian trails to promote non-motorized transport and reduce emissions and congestion. This may also include prioritizing connections to schools, jobs, and healthcare in disadvantaged communities.
- **Urban Agriculture and Community Gardens:** Making land available (via lease or partnership) for community farms or food forests, especially in food deserts to promote local food systems, reduce food transportation emissions, and improve food access and community health in low-income areas.
- **Mobility Hubs and EV Infrastructure:** Using available land to build EV charging stations, mobility hubs, or park-and-ride lots to encourage electrification of transport and multimodal options and improve EV access and charging availability in lower-income and rural communities.

IDOT should also use land redevelopment projects as opportunities for co-planning with community members, emphasizing local needs, to facilitate resilient projects that are integrated with local environments and empower communities through inclusive decision-making.

22F) Implement and Support Zero-Emission Government Fleet Conversion:

IDOT should assess its existing fleet of light-duty vehicles, maintenance trucks, and support equipment to pinpoint how, where, and when zero-emission replacements can feasibly be deployed. This process may include conducting cost-benefit analyses, evaluating charging and alternative fueling requirements, establishing procurement strategies, and charting timelines for phasing out higher-emission vehicles. This type of forward planning can not only advance IDOT's climate goals but also reduce long-term operational expenses.

In parallel, IDOT should evaluate the need for a statewide training program to help local agencies develop and maintain zero-emission vehicle (ZEV) fleets. Through this initiative, agency staff could receive specialized instruction on procuring, operating, and servicing ZEVs, thus ensuring local governments can transition to low- or zero-emission fleets with confidence.

IDOT should also deepen collaboration with transit agencies by jointly pursuing funding opportunities, coordinating infrastructure rollouts, and prioritizing electrification for regional transit services. This may include mandating and financially supporting electric buses for transit agencies through IDOT's Illinois Clean Energy initiatives or dedicated grants.

23

Recommendation Detail:

Implement Climate Adaptation Measures to Manage Risks

Recommended Actions for IDOT

23A) Implement Recurring Statewide Climate Risk Assessments:

Given the overall and increasing changes in Illinois' climate, IDOT should implement a recurring Statewide Climate Risk Assessment across all modes to inform its Resilience Improvement Plan (RIP). By evaluating climate vulnerabilities on a regular basis, prioritizing identified risks in decision-making, and proactively addressing weaknesses before they lead to costly failures, IDOT can safeguard Illinois' transportation network for decades to come, despite intensifying climate challenges. This may include:

- Regularly updating the Statewide Climate Risk Assessment using current climate science and addressing highways, bridges, transit freight, passenger rail, ports, aviation, and active transportation.
- Incorporating an equity lens into the Statewide Climate Risk Assessment, identifying communities where transportation disruptions from climate hazards cause disproportionate harm. A mix of quantitative data, qualitative feedback, and mapping can provide an understanding of risks in neighborhoods highly impacted by climate change including lack of alternate transit options.[56] IDOT's climate risk assessment should map infrastructure risk data with demographic and socioeconomic data (e.g., Climate and Equity Jobs Act-defined equity priority areas[57]) to prioritize solutions that protect the most at-risk populations.
- Incorporating Statewide Climate Risk Assessment findings into recurring revisions of its RIP and project selection processes, ensuring that the insights directly guide updates to design standards, asset management practices, emergency planning, and programming decisions.

23B) Develop an Agency-Wide Resilient Infrastructure Guide (RIG):

IDOT should develop and adopt an agency-wide Resilient Infrastructure Guide (RIG) that embeds up-to-date resilience-focused engineering, construction, and maintenance practices (based on the RIG) into the Bureau of Design and Engineering (BDE) Manuals. This includes:

- Review the current definition of resilient infrastructure[58] in the context of climate adaptation.
- Establish performance-based design standards that incorporate load duration, service continuity, and recoverability.

[56] IDOT, ArcGIS
[57] Illinois Clean Jobs Coalition: Equity Provisions in The Clean Energy Jobs Act, May 10th, 2021
[58] IDOT Long Range Transportation Plan

- Require resilience assessments through RIP in the project development process for bridges, pavement, transit facilities, and intermodal infrastructure.
- Incorporate redundancy, robustness, and rapid-recovery design features where applicable.
- Pilot and scale innovative materials and methods through IDOT Operations Innovative Ideas Contest (e.g., modular bridge elements, cool pavements, or heat-reflective asphalt).[59]
- In coordination with the RIP, integrate resilience scoring into capital programming tools and updating the RIG every 5 years to follow recommendations from the RIP.
- Incorporate RIG criteria into the BDE manuals.[60]

23C) Develop a Program to Plan for Extreme Weather:

IDOT should develop and implement a comprehensive "Planning for Extreme Weather" program to systematically adapt Illinois' transportation network to increasing threats from flooding, storms, and prolonged heat waves across modes to improve resilience. Components could include:

- **Incorporate Climate Projections into Design and Maintenance:** Update IDOT's design standards and asset management practices to account for future rainfall intensities, storm severity, and temperature extremes using modern temperature and climate projections (e.g., number of 90-degree Fahrenheit days) in project design criteria to ensure that infrastructure built today performs under changing climate conditions.
- **Enhance Operational Readiness and Monitoring:** Establish formal extreme weather protocols with triggers for inspections, closures, or detours; deploy more sensors and cameras to monitor flooding, wind, and pavement conditions in real-time, and stage resources to enable faster response and recovery.
- **Harden Critical Infrastructure:** Invest in upgrades such as larger culverts, reinforced bridge foundations, slope stabilization, and erosion control measures, prioritizing corridors most at risk of flooding or wind damage.
- **Emergency Planning and Exercises:** Regularly update continuity of operations plans, conduct tabletop and full-scale exercises (e.g., statewide flood scenarios), and ensure coordination with emergency partners to refine roles and communications.
- **Equity in Response and Recovery:** Prioritize resilience upgrades to communities disproportionately impacted by disasters and vulnerable to flooding, storm damage, and heat impacts to ensure equitable access to transit, safe roads, and cooling resources during and after events.

[59] FHWA, High-Performance Concrete and Resilience Research
[60] Illinois Department of Transportation Bureau of Design and Environment

23D) Develop a Multimodal Climate Adaptation Strategy:

IDOT should develop a multimodal Climate Adaptation Strategy within the RIP that identifies climate risks across all transportation modes, provides recommended adaptation approaches, and defines measurable resilience targets aligned with CEJA. Steps may also include:

- Integrating climate risk metrics into transit and rail asset management practices by incorporating factors such as heat exposure and flood vulnerability.
- Offering technical guidance to local providers geared toward tracking and mitigating climate-related incidents.
- Updating design guidance for transit, pedestrian, and rail infrastructure by coordinating across divisions to apply the RIG to BDE manuals, transit facility specifications, and pedestrian safety programs.
- Piloting projects in strategic areas to assess the effectiveness of adaptation interventions such as heat-mitigating pavements, shaded bus stops, flood-resilient bike/pedestrian pathways, cooling strategies at intermodal hubs, and rail signal heat-proofing measures.
- Establishing internal working groups that include representatives from across the agency (e.g., Planning, Highways, Intermodal, and Communications) to guide implementation, facilitate data sharing, and align resilience objectives across modal programs and capital plans.

23E) Enhance Emergency Preparedness and Response Capabilities:

IDOT should use vulnerability assessment findings from the RIP and the LRTP to enhance its emergency preparedness and response capabilities. Findings can be used to:

- Enhance continuity of operations plans and incorporate climate adaptation projections and data (e.g., increased storm intensity) into scenarios for planning, training, and exercises.
- Update IT infrastructure, train staff for flexible roles, and incorporate backup power systems at critical sites to maintain essential functions through prolonged crises.
- Conduct regular emergency exercises with participation from essential partners (e.g., Illinois Emergency Management Agency, MPOs, etc.), to refine emergency plans (e.g., flood scenario).
- Expand ITS and traveler information tools and deploy more sensors and cameras to monitor and detect real-time conditions (e.g., detect flooding, closures, or unsafe temperatures) early and take swift action, improving response and recovery times.
- Review plans and infrastructure to ensure emergency response and resilience projects equitably support low-income and minority neighborhoods disproportionately affected by climate-related hazards. This may result in specific measures such as improving flood protection, transit options, and access to cooling centers or ensuring that snow is cleared at bus stops for transit accessibility.

23F) Expand Use of Nature-Based Solutions:

IDOT should update its design and construction standards to systematically incorporate nature-based solutions (e.g., large culverts with naturalized channels that can help prevent flood washouts, shade trees near roads in urban heat islands to lower pavement temperatures and cool local environments) that enhance resilience and sustainability across the State's transportation network. These modifications can not only mitigate climate risks such as flooding and extreme heat, but also offer co-benefits like improved air quality, habitat support for local wildlife, and reduced maintenance costs over time.

Expand Community Resilience Support

Recommended Actions for IDOT

24A) Expand Community Impact Strategies:

IDOT should elevate community resilience as a priority such that historically marginalized or underserved communities do not bear an outsized share of environmental and social hazards. Steps may include:

- Evaluate the need for additional, dedicated staff or third parties to conduct early and sustained outreach to low-income and minority neighborhoods, leveraging culturally appropriate materials and offering communications in multiple languages.
- Embed community resilience objectives in statewide transportation plans, TIPs, and the Statewide Transportation Improvement Program (STIP) to further institutionalize environmental justice. Use equity screening tools to assess how proposed projects affect different populations and prioritize investments in underserved communities.
- Establish robust data collection methods—such as demographics, air quality, noise, and traffic analysis by employing GIS or other mapping technologies to detect areas burdened by environmental stressors, so mitigation efforts can be targeted most effectively.
- Reduce negative environmental impacts, such as air and noise pollution or displacement, especially where they fall most heavily on underserved communities. Examples include investing in green infrastructure—like noise barriers, tree planting, and stormwater management—and avoiding or minimizing forced relocations of residents and businesses whenever possible.
- Invest in transit access and reliability, active transportation, and clean transportation solutions.
- Implement initiatives (e.g., small business contracting opportunities, targeted recruitment) to ensure that underserved communities benefit from employment, contracting, and training opportunities related to sustainable transportation projects.
- Establish performance metrics and regular reporting to measure progress.

24B) Accountability for Community Resilience Measures:

IDOT should implement accountability measures—such as increasing IDOT staffing for contractor oversight—to ensure that community resilience measures identified in project assessments are carried forward throughout the life of the project and fully implemented upon project completion by contractors.

24C) Expand Transition Support:

IDOT should pilot the provision of transition support, including temporary or permanent relocation assistance for communities impacted by sustainability-related mitigation or adaptation measures.

Objective #4: Drive Sustainable Outcomes
Considerations for the General Assembly

In addition to the recommendations for IDOT identified above, the BRC has identified potential changes for the General Assembly's consideration:

Set Statewide Sustainability Goals / Targets:

Establishing statewide climate and sustainability goals and targets to reduce GHG emissions, adapt to climate change risks, and mitigate community environmental impacts for transportation will provide clarity and a consistent framework to measure performance. This expands on Illinois Executive Order 2019-06 which supports Illinois' membership in the US Climate Alliance and committed Illinois to the principles of the Paris Climate Agreement. Example metrics could include:

- Greenhouse Gas Emissions Reduction (e.g., absolute or per-capita targets)
- VMT (e.g., percentage of mode share)
- ZEV Adoption (e.g., percentage of State fleet or new vehicle sales)
- Renewable Energy Capacity for Transportation (e.g., energy capacity derived from solar/wind)
- Community Air Quality Improvements (e.g., reductions in particulate matter in communities at risk)

Establish an Interagency Climate Data Policy:

Mandating unified climate data and projection standards across State agencies such as IDOT, Illinois Emergency Management Office (IEMA), DNR, IEPA, and other relevant agencies increases consistency in project development, prevents duplication, and allows each agency to leverage shared research.

Establish an Interagency Sustainability Task Force:

Creating a formal task force to collaborate on nature-based stormwater solutions and broader climate resilience efforts breaks down information silos, promote better data sharing, and accelerate adoption of holistic, eco-friendly transportation strategies. Collaboration could include State agencies such as IDOT, IDNR, and EPA as well as other stakeholders such as advocacy groups, experts, and higher education institutions.

Enable Transit-Oriented Equitable Development:

Dense, mixed-use development in transit-rich areas cultivate more walkable neighborhoods, shorten commuting distances, and make more efficient use of existing infrastructure. Amendments to relevant zoning statutes (e.g., 65 ILCS 5/11-13 for municipalities and 55 ILCS 5/5-12001 for counties) such as allowing or requiring the reduction or elimination of parking minimums near transit stations enables and encourages equitable TOD.

Authorizing IDOT, the Illinois Housing Development Authority (IHDA), and regional planning organizations to offer grants, tax abatements, or low-interest financing for municipalities and developers that include affordable housing units near transit further encourages equitable TOD. This could include conditioning incentives for preserving or creating below-market units to ensure that TOD benefits extend to lower-income families. Coupled with reduced parking mandates and flexible zoning, these changes could help transform underutilized parcels near transit stations into mixed-income, mixed-use communities that reduce sprawl, cut down on vehicle usage, and foster sustainable, inclusive urban growth.

Enable Multi-State Transit Vehicle Purchase Contracts:

Enabling IDOT and transit agencies statewide to procure vehicles by “piggybacking” on other states’ transit contracts allows Illinois to capitalize on volume discounts and avoid duplicating contract specifications already vetted elsewhere. Under current law, agencies must often conduct standalone solicitations that can drive up costs and delay fleet expansion.

Promote Active Transportation:

Requiring all major State-funded road projects include bike and pedestrian facilities unless formally exempted provides additional transportation options to Illinoisans. Additionally, establishing a system of e-bike purchase rebates with larger incentives for low-income residents could make cycling more accessible. Tax breaks or other incentives to businesses that invest in bike storage, showers, transit subsidies, or e-bike loan programs further promotes active transportation.

Expand EV Purchase Incentives and Require EV charging Installation:

Amending 415 ILCS 120 (the Electric Vehicle Act) to expand EV rebates to cover used vehicles and offer instant discounts at the point of purchase improves affordability, particularly for low-income buyers. Concurrently, the adopting or refining provisions in 20 ILCS 2705 to require utilities and transit agencies to prioritize EV infrastructure deployment in areas facing high pollution or limited mobility further benefits low-income and environmental justice communities. Such policies should empower regional planning councils and neighborhood organizations to co-design clean transportation corridors that best reflect local needs.

Prioritize Sustainable Land Use:

Authorizing IDOT to lease, sell, or transfer surplus land—or enter into public-private partnerships—for sustainable and equity-focused purposes. This could explicitly allow projects such as solar farms, greenways, affordable housing near transit, EV charging sites, and urban agriculture to move forward under expedited approval processes.

Enforce Transit Commuter Benefits Program:

Designating an oversight authority for the Transportation Benefits Program Act (HB 2068) to audit employer compliance and impose penalties for noncompliance ensures that eligible employers offer pre-tax commuter benefits reliably and equitably. Additionally, expanding these amendments to subsidized transit pass programs maximizes the economic, environmental, and quality-of-life gains envisioned under the Transportation Benefits Program Act.

Consider Community Resilience and Clean Transport Reforms:

The BRC also requests consideration be given to the clean transportation reforms set forth in the proposed Environmental Justice Act (HB 2521), the Clean and Equitable Transportation Act (SB 3936 / HB 5829), and the Electrify the Transportation Sector Act (HB 1634 / SB 2050). By creating new statutory mandates and funding, these measures bolster interagency coordination, establish clean vehicle standards, and prioritize infrastructure investments in areas suffering from high pollution or limited mobility access. Together, these bills chart a path toward healthier air, climate resilience, and equitable transportation for all Illinoisans.

Strengthen Displacement and Relocation Assistance:

Illinois could provide more equitable relief for communities impacted by large-scale infrastructure projects while preserving the State's economic interests and promoting sustainable development through amendments to 735 ILCS 30 (Illinois Relocation Assistance Act). Broadening eligibility, increasing financial support to reflect current housing and business costs, and requiring earlier engagement with residents or businesses facing displacement formalizes provisions for stronger protections and more timely assistance, addressing gaps in the existing law. In tandem, a dedicated fund could be created to cover the added relocation, job training (e.g., green jobs), small business support, and affordable housing preservation costs required by these amendments.

Objective #5:

Secure Adequate Funding Sources

Current Situation

IDOT faces ongoing and anticipated challenges to the existing transportation funding portfolio. The BRC recognizes the current funds available from Rebuild Illinois and the IIJA; however, the value of existing revenue sources has and will be eroded by recent construction cost inflation, reducing the purchasing power of dedicated transportation funds even as system needs continue to grow. Many of the State's transportation revenue sources also face potential decline over time. Specifically, MFT revenues will be negatively impacted by improved fuel economy and the adoption of electric vehicles, creating a structural deficit that will intensify without policy intervention.

The State's current funding structure also reflects transportation and consumption patterns from an earlier era. Traditional revenue sources like MFT and MVR fees were designed when nearly all travel occurred in petroleum-powered personal vehicles. Today's transportation landscape includes electric vehicles, TNCs, e-commerce delivery services, and diverse mobility options that rely on the transportation system but contribute minimally to its funding. The mix of vehicles on the road will change more dramatically as the total cost of ownership for zero emission vehicles fall, including for EVs, hydrogen, and other alternative fuels. This misalignment between those who use the system and those who pay for it creates both fiscal and equity concerns that demand attention.

IDOT and the ILGA will need to address these challenges in the context of anticipated transportation system funding needs. Beyond ensuring adequacy, Illinois also has an opportunity to use transportation funding policy to advance broader priorities. Revenue mechanisms can be designed to provide reliability, reduce congestion, lower greenhouse gas emissions, improve safety, and promote equity—transforming funding policy from a purely fiscal exercise into a tool for achieving transportation objectives. Northeast Illinois is consistently ranked among the world’s most congested regions, with annual loses totally nearly $6 billion in lost economic productivity. Other DOTs, including Colorado, North Carolina, Tennessee, and Virginia have used forms of managed lanes and tolling to raise both revenue *and* improve congestion. By securing and using revenue mechanisms that align with State goals and priorities, IDOT can improve transportation system effectiveness and outcomes.

In the near term, Illinois should expand tolling authorization for IDOT, index MVR fees to inflation while considering adjustments based on vehicle characteristics and enact heavy vehicle user fees that better reflect roadway impacts. Presently IDOT does have tolling authorization for new capacity tied if the project is delivered as a P3s; however, the BRC believes this should be expanded beyond P3s to allow IDOT increased options in the future.

Over the medium term, Illinois should pilot road usage charging to explore viable alternatives to MFT and diversify the funding portfolio by enacting indirect user fees on retail delivery and transportation network companies. The State should also study carbon pricing as a potential long-term strategy that aligns transportation funding with climate goals.

Finally, IDOT should demonstrate responsible stewardship of existing resources through active program management and leverage comprehensive needs assessments to inform the scale and timing of future capital bill requests, ensuring that any new revenues are sized appropriately to address documented transportation system needs. The BRC asks the ILGA to consider a Transportation Funding Coordination Committee to provide sustained oversight and guidance as Illinois transitions toward more sustainable revenue sources.

Recommended Actions for IDOT

The BRC recommendations represent a transformation of how Illinois funds transportation. The recommendations involve moving away from motor fuel taxation and toward more direct usage fees (tolls, RUC, and heavy vehicle fees); innovative indirect usage fees (TNC fees and retail delivery fees); and revenue mechanisms that align with important related policy goals such as social equity, environmental protection, and congestion mitigation, such as managed or choice lanes which use dynamic pricing to ensure vehicle throughput to ensure reliability, manage congestion, and provide funding. Given the diversity of funding mechanisms recommended, their relatively greater complexity compared to traditional MFT, their more visible impacts on end users (constituents), and the relative urgency with which they must be pursued, successful implementation will benefit from careful coordination and monitoring.

IDOT and partners should ground decisions about transportation funding in a clear set of best-practice principles. Establishing principles gives agencies studying, testing, and implementing revenue mechanisms consistent guidance against which to measure and report performance and for adopting agency rules where discretion exists in executing ILGA's policies. Recommended principles include the following:

- **Adequacy:** To meet the full range of transportation system needs, revenue generating mechanisms must be sustainable and long-lasting. Adequacy means more than covering current expenses; it requires dynamic revenue that follows inflation, population shifts, and changing travel patterns. A system that consistently falls short of needs creates a backlog of deferred maintenance, limits the State's ability to expand multimodal options, and weakens the overall economy.

- **User Equity:** User equity stipulates that those who benefit from or impose costs on the transportation system contribute proportionally to its upkeep. Heavier vehicles, for example, impose greater wear on pavements and structures and should contribute accordingly through taxes and fees that account directly or indirectly for vehicle weight. Private fleets, delivery platforms, and transportation network companies, all of which depend on Illinois' infrastructure, should also be required to share responsibility for the system they use. A strong user-pay framework provides both equity and transparency, demonstrating to the public that system costs are borne by those who directly benefit.

- **Alignment with Co-Benefits:** Illinois should also emphasize alignment with co-benefits, designing funding mechanisms that advance other statewide priorities alongside revenue generation. Transportation policy has direct implications for safety, climate change, congestion, and equity. Fee structures can be adjusted to account for ability to pay, ensuring that low-income travelers are not disproportionately burdened. Similarly, congestion pricing or road pricing can be used to both generate revenue and reduce demand in high-traffic corridors, creating a dual benefit of funding and improved system performance. A critical co-benefit is maintaining the State's intergovernmental partnership. For decades, a portion of the State's Motor Fuel Tax has been

distributed directly to local agencies, and as Illinois considers new funding mechanisms to supplement or replace the MFT, it is essential that any new framework be designed to protect this vital local share and ensure local governments are accurately represented in the development process. When structured carefully, revenue policy becomes a tool to advance multiple objectives while still ensuring fiscal sustainability.

- **Public Understanding:** Revenue policies are most effective when they are transparent, easy to understand, and straightforward to comply with. When travelers know why they are being charged and how funds are being used, acceptance improves. Public communication and education campaigns can reinforce this understanding, particularly when new or unfamiliar mechanisms such as managed lanes/choice lanes, congestion pricing, or RUC are introduced. Clear reporting on how revenue is spent also helps build public trust, demonstrating that dollars collected are being reinvested into system improvements that benefit all users.

- **Administrative Efficiency:** Administrative efficiency must also be prioritized to ensure that new revenue sources achieve their intended purpose and maximize revenue available for infrastructure investment. Collection and enforcement systems should be designed to minimize costs, avoid unnecessary duplication, and take advantage of technology that standardizes compliance. For example, electronic tolling, automated reporting, or integration with vehicle registration databases can reduce overhead and maximize net revenue.

25A) Establish a Transportation Funding Coordination Committee:

To facilitate the implementation of the BRC recommendations, a transportation funding coordination committee should be established that includes State lawmakers, IDOT, transportation system users, local governments, industry representatives, and other stakeholders. The purpose of the coordination committee should be to guide the policy development and technical design of innovative transportation funding mechanisms including tolling, RUC, heavy vehicle fees, MVR modernization, TNC fees, retail delivery fees, and carbon pricing. The coordination committee should meet regularly and provide formal written updates to the ILGA on the status of revenue initiatives, including recommendations for legislative action required to improve revenue policy. The committee could also be responsible for guiding and reporting on the transportation needs assessment (see Recommendation 17A), a critical complement to informing and sizing the State's revenue generating efforts.

The coordination committee should include a designated funding lead within the IDOT, which could be a new position for the agency. Such a position should be responsible for efforts to secure federal tolling authorization and for managing progress toward funding modernization, including coordination with partner agencies at the State and local levels, analysis of revenue yields, equity impact monitoring, and assessing impacts on other policy priorities relative to funding goals and principles.

25B) Pursue Tolling Authorization:

The State should expand its use of tolling as a transportation funding mechanism. Illinois already has a robust system of tolled highways operated by the Illinois State Toll Highway Authority, demonstrating the viability and value of this approach to funding infrastructure investment, operations, and maintenance. The collection of direct user fees (tolls) provides a dedicated revenue source to meet the upkeep needs of the tolled facility and offers greater flexibility in the use of the State's other existing funding sources. Depending on the pricing approach, tolling can support other transportation goals, including reducing congestion, encouraging the use of active and sustainable modes, and reducing transportation-related emissions. Under some models, toll revenue could also directly support complementary transportation system investments such as transit services that operate within the same travel corridor, as has been done in Virginia on the I-66 express lanes project.

To fulfill this recommendation, IDOT should incorporate tolling as a funding strategy into ongoing and upcoming projects, especially on high-volume and congested corridors. Near-term opportunities could include the reconstruction of the Eisenhower Expressway (I-290) and the addition of managed/choice lanes on the Stevenson Expressway (I-55), both of which include the option of tolling as part of their project scopes. IDOT should also conduct an inventory of potential opportunities for tolling on other corridors. This could include reconstruction of the Dan Ryan Expressway (I-90/94) as well as the longer-term reconstruction of the aging expressway system in the Chicago region and other high-cost capital projects throughout the state (e.g., large bridge reconstruction projects).

For IDOT to do this effectively it needs expanded legislative authority so that it can plan for myriad options that could be available. These could vary depending on project specifics. For example, IDOT requires advance ILGA approval to implement tolls on I-290, which could include approval to expand the existing Illinois Tollway system by transferring I-290 into Tollway control, authorization to proceed with a P3 to implement tolling on I-290, and/or a new statutory mechanism allowing for tolling overseen by IDOT. In contrast, IDOT will not require additional approval to implement managed lanes on I-55 under a P3 approach as the joint resolution authorizing the project is in place. Expanded authorization also allows IDOT to incorporate multiple funding and project delivery options in the planning phase, which speeds overall project delivery as such options are included in federal NEPA documents and stakeholder conversations.

USDOT allows tolling on any new capacity (e.g., additional lanes on I-55) as part of a reconstruction or replacement project on any bridge or tunnel (e.g., the Des Plaines River Bridge on I-290), or as part of reconstruction or replacement of a non-Interstate highway (e.g., IL 53). However, IDOT will need to seek federal approval to toll existing lanes on untolled Interstate highways. IDOT likely needs to obtain a waiver from USDOT under one of three existing pilot programs that allow for tolling on the Interstate system.[61] As projects that require federal authorization are identified, IDOT should pursue waiver(s) through the appropriate pilot program. The ILGA should ensure that its tolling authorizations allow for IDOT to consider tolling in each of the "by right" situations, and others.

[61] These programs include the Value Pilot Pricing Program, the Congestion Relief Program, and the Interstate System Reconstruction and Rehabilitation Program. Each has a limited number of program slots under which tolling of existing Interstate highway capacity is allowed, subject to specific conditions.

IDOT should also collaborate with other relevant stakeholders, including the Illinois Tollway, local governments, and private sector partners to identify the appropriate delivery and operational model(s) for any new tolling projects. Like many states with both a state DOT and an independent statewide toll authority, these two agencies can bring their respective areas of expertise to bear in crafting an implementation approach that prioritizes cost efficiency and a seamless user experience. The specific approach selected may vary among projects, depending on the scope of improvements, tolling configuration selected, and expected traffic volumes.

25C) Index MVR Fees and Consider Adjusting Based on Vehicle Characteristics:

Indexing MVR fees to inflation results in a more stable and predictable long-term revenue source for Illinois transportation. The State has already indexed its MFT to inflation (specifically, to CPI-U, which is the Consumer Price Index for All Urban Consumers). Likewise tying MVR fees to inflation will help preserve the purchasing power of the State's transportation dollars. Without these adjustments, the real value of MVR fees erodes over time, which will leave the State with a decision to periodically pass fee increases or budgetary cuts, both of which can be challenging to enact, and which create uncertainty for long-term transportation investment decisions. This is especially true for the EV surcharge component for MVR fees, which aims to approximate MFT that EV owners avoid. With MFT indexed to inflation, the amount that EVs will pay in MVR fees will remain flat while the corresponding amount paid in MFT by non-EVs will increase. To carry out this recommendation, the State should begin indexing MVR fees to inflation as part of its transportation funding strategy starting in FY2027.

Illinois should also consider varying MVR fees based on vehicle characteristics, such as age or value to reflect equity goals or weight to reflect roadway impacts and safety considerations. This strengthens the fairness of the fee structure and aligns revenues more closely with actual costs imposed by vehicles on the system. For example, MVR fees that vary by age, with older vehicles pay less in annual renewal costs, may correlate with owner income, allowing for a fee policy that aligns with policy preferences to address income equity. A value-based MVR fee offers similar alignment, although such a fee must be structured consistently with constitutional provisions around property taxation. In addition, MVR fees that incorporate weight or hood height factors can align fees with priorities related to safety, acknowledging the correlation between vehicle size or weight and heightened risk of injury or death to pedestrians, cyclists, and occupants of smaller vehicles. At least 30 states incorporate at least one of these factors (value, age, and size/weight) into MVR fees. Examples include Minnesota and Iowa (value); Minnesota, New Jersey, and Utah (value); and Florida, Hawaii, Iowa, Kansas, and Washington (weight).

Implementation will require legislative action by the ILGA to authorize indexing of MVR fees. The Illinois Secretary of State will then be responsible for communicating and administering the updated MVR fee structure to the public.

25D) Enact Heavy Vehicle User Fees:

To better account for the costs imposed by heavy-duty vehicles on the roads of Illinois, the State should consider charging such vehicles proportionally for their usage of roads. Heavy-duty vehicles already pay increased registration charges given their vehicle weight, as well as a higher per-gallon tax rate on diesel than is assessed on purchases of gasoline. However, the adoption of a range of more direct revenue mechanisms by the ILGA can better assess heavy-duty vehicles for their road usage directly. Options include a combination of diesel tax adjustments, targeted use of tolling, adjustments to existing weight-based registration fees,

oversize/overweight permit fees that better reflect road costs, container fees applied to goods moving through major freight hubs such as intermodal yards or ports, and weight-distance charges.

Using the results of these pilots and studies, Illinois should determine an appropriate mechanism and rate. This assessment should consider legal feasibility, operational practicality, environmental impacts, and equity outcomes to ensure that charges are transparent, efficient, and fairly distributed. Once a preferred approach is identified, the ILGA should enact the mechanism, establishing administrative, enforcement, and collection structures and defining how revenues will be allocated to freight-related infrastructure needs. Implementation should be phased in with sufficient lead time to allow carriers to adapt while providing the State with a stable and sustainable revenue stream tied directly to road usage.

25E) Pilot Road Usage Charging:

Viable funding mechanisms to replace MFT with sustainable, user-based, equitable alternatives will take at least a decade to fully implement. To begin this transition, Illinois should authorize and launch a pilot within the next 12 months to explore the viability of per-mile RUC for light-duty vehicles. By moving toward a direct user fee through legislatively authorized research and development, lawmakers will gain the tools needed to advance a sustainable funding framework in a timely and informed manner.

The ILGA should enact legislation creating a road usage charging pilot and direct the appointment of a technical steering committee representing both public and private stakeholders. The committee should oversee pilot design, implementation, and evaluation, with attention to questions such as appropriate per-mile rates, methods of road usage reporting, enforcement and collection structures, and administrative responsibilities. Findings from the pilot should be formally reported to the ILGA, enabling legislators to incorporate lessons learned into the State's long-term revenue strategy.

In parallel, the State should consider how the results of its pilot align with broader national and federal efforts on RUC. Federal research and multistate initiatives can provide useful context for Illinois as it assesses the potential of RUC to replace the MFT over the long term. Taken together, these efforts will position Illinois to phase in a sustainable, user-based funding model that ensures predictable revenues for transportation infrastructure well into the future.

25F) Diversify the Funding Portfolio by Enacting Additional Indirect User Fees:

Illinois should diversify its transportation funding portfolio by enacting additional indirect user fees that capture revenue from growing sectors of the economy that increasingly rely on and impose costs on the transportation system. Two specific promising funding alternatives are retail delivery fees and statewide fees on TNCs. Both approaches broaden the base of transportation revenue beyond fuel purchases, vehicle registration, and toll road usage, better aligning State revenues with modern travel and consumption patterns while ensuring that those benefiting from the transportation system help contribute to its upkeep.

A retail delivery fee applies to goods delivered directly to consumers, reflecting growing impact of e-commerce on roadway usage. Deliveries contribute to congestion, wear and tear on local streets, and environmental impacts that are not currently offset by existing revenue sources. Illinois can design this fee in consultation with stakeholders to determine appropriate exemptions, such as for small businesses or essential goods, and to establish administrative mechanisms that are straightforward for retailers to implement.

A statewide fee on transportation network companies, such as ride-hailing services, builds on existing local policies already in place in Chicago and other cities. These services depend on a high-quality road network while contributing to congestion in urban areas. Illinois could structure such a fee to vary by vehicle occupancy, time of day, or location, thereby aligning incentives with policy goals such as reducing single-occupant trips and mitigating congestion in central business districts. Learning from other states and cities, Illinois can design a fee that is equitable, transparent, and supportive of broader mobility goals.

To ensure that these fees remain effective and aligned with transportation priorities, Illinois should also require data-sharing from both retail delivery platforms and TNCs. Access to this data helps IDOT and regional planning organizations better understand travel behavior, freight flows, and emerging mobility patterns. More importantly, it allows the State to calibrate fee structures over time so that they remain fair and responsive to shifts in technology and demand. Transparent reporting on collected revenues and observed system impacts will further strengthen public trust in these mechanisms.

Finally, Illinois should commit to assessing and reporting on the impacts of retail delivery and TNC fees on travel behavior, congestion, emissions, and equity. This monitoring and reporting will inform whether adjustments are needed and will help the State prepare for future technological shifts, such as the expansion of autonomous vehicles and continued growth in e-commerce. By adopting these measures, Illinois will position itself to modernize its revenue system, diversify its funding sources, and ensure long-term sustainable funding for its transportation infrastructure.

25G) Study Carbon Pricing as a Transportation Funding Strategy:

Illinois should evaluate the potential role of carbon pricing as a strategy to fund transportation infrastructure while also advancing the State's climate commitments. By placing a price on greenhouse gas emissions through approaches such as a carbon tax, a cap-and-trade program, or a hybrid model, Illinois could create a dedicated revenue stream that simultaneously incentivizes lower-emission choices. Carbon pricing aligns transportation funding with environmental objectives by rewarding efficiency, reducing emissions, and encouraging investment in cleaner modes of travel.

To move this strategy forward, IDOT, the IEPA, and other relevant agencies should study the potential impacts and revenue capacity of various carbon pricing approaches, alone and in collaboration with other multi-state carbon pricing initiatives. This study should evaluate legal authority, administrative structures, and implementation pathways, while also considering environmental outcomes, equity implications, and economic impacts. Lessons from other states and international programs should be incorporated to provide Illinois lawmakers with a clear understanding of potential risks, benefits, and best practices.

The study should also examine how carbon pricing fits within the State's broader transportation funding portfolio and its clean energy policies. Consideration should be given to how revenues could be allocated to support transportation priorities such as system preservation, climate resilience, and transit investments, while also addressing equity concerns for households and businesses most affected by the costs. Findings should be reported to the ILGA to inform whether carbon pricing is a viable, sustainable, and equitable component of Illinois' long-term transportation funding strategy.

Advance the Next Capital Bill

Recommended Actions for IDOT

26A) Demonstrate Responsible Stewardship of Existing Resources:

In anticipation of any future capital bill, IDOT should demonstrate its ability to invest existing transportation resources in alignment with State policy goals. For example, as IDOT implements the active program management approach in Recommendation 4, the Department should identify and execute a planned spend-down of the existing cash balance in the Road Fund and the Construction Account Fund. The anticipated schedule of that spend-down should also inform the timing of a future capital bill. IDOT should also implement the elements of Recommendation 18 (flexible funding) that are allowed under its existing authorities, leveraging that more flexible approach to accelerate project spending while still aligning investments with the broader set of statewide needs and policy goals.

26B) Leverage Needs Assessment to Inform Scale of Future Funding Requests:

Any needs assessment conducted under Recommendation 17A should identify the scale of unfunded investments required to address asset preservation on both the IDOT and non-IDOT elements of the State's transportation system. That assessment should inform the sizing of new revenues included in a future capital bill relative to the higher level of ongoing baseline transportation revenues created by Rebuild Illinois. In consultation with the transportation funding coordination committee (see Recommendation 25A), IDOT should also identify how varying scales of funding could align with investments to achieve other State policy priorities beyond system preservation (e.g., expanded access to jobs, increased mode share for transit and other non-car modes, reduced greenhouse gas emissions).

27

Recommendation Detail:

Ensure Adequate Budget for Implementing BRC Recommendations

Recommended Actions for IDOT

27A) Incorporate BRC Recommendations into Upcoming Operating Budget Requests:

IDOT should incorporate the staffing and resources required to advance BRC recommendations into future budget requests. This includes initial submission to the GOMB and subsequent work with the ILGA as part of the annual budget cycle. Depending on the scale of resources required by recommendation, this will likely require some period of ramp-up over multiple annual budget cycles (e.g., to support incremental growth in headcount for priority functions and roles). IDOT should also identify any resources that will be required to support partner agencies (e.g., technical assistance for local governments) and incorporate them into the budget request as appropriate.

27B) Sync Future Capital Bill Requests with Supporting Operating Budget Investments:

In parallel with any capital bill discussions (see Recommendation 26), IDOT should identify the scale of accompanying operating budget resources that will be required to advance capital investments on that scale, including both staff capacity and other agency resources.

Objective #5: Secure Adequate Funding Sources
Considerations for the General Assembly

Funding sources are critical to IDOT's ability to implement the BRC recommendations. The BRC encourages the ILGA to provide the resources necessary for IDOT to implement these changes and consider the following:

Consider Recommended Revenue Mechanisms to Fund Capital Investments:
When developing any future capital funding package, the BRC requests that consideration be given to aligning revenues with the recommended principles, including the specific revenue mechanisms outlined in Recommendation 25. These could include additional direct user fees (e.g., tolling, heavy vehicle fees), additional indirect user fees (e.g., TNC fees, retail delivery fees), and the modernization of existing sources (e.g., inflation indexing MVR, adjustments based on vehicle characteristics). Implementing these additional revenue mechanisms will require legislation by the ILGA. The size and rate of revenue mechanisms should be informed by the information provided by IDOT (see Recommendation 26B).

Preserve Flexibility in Funding Allocation:
Preserving flexibility for the allocation of funds provided in future capital bills allows IDOT and other transportation agencies to adapt as projects and circumstances evolve. Consistent with the approach outlined in Recommendation 20 this could include focusing budget callouts on categories rather than specific projects and aligning any legislatively specified projects with the principles of efficient program management. Existing funding allocation statutes could also be amended to increase flexibility across modes, geographies, and levels of government.

Establish a Transportation Funding Coordination Committee:
The BRC requests consideration for the establishment of a transportation funding coordination committee that includes State lawmakers, transportation system users, local governments, industry representatives, and other stakeholders. The purpose of the coordination committee should be to provide input on the policy future transportation funding mechanisms. The committee should have the ability to access necessary information from implementing agencies to evaluate progress and be provided funding for professional support from IDOT.

Incorporate Strategies and Lessons Learned into the next Capital Bill BRC:
The BRC requests that the recommendations contained in this report be reflected as principles or components of any future capital bill. For example, the capital funding package could reflect the overarching priority identified in Recommendation 20A to prioritize investments in maintaining and optimizing existing assets, including by directing local government recipients of state funds to leverage those investments accordingly. Following the initial implementation of the BRC recommendations, the outcomes should be assessed to identify lessons learned and adjustments incorporated where relevant.

Incorporate BRC Recommendations into Upcoming Operating Budgets:
IDOT will require support as it works to advance the BRC recommendations. This support could include operating investments at both IDOT and other partner agencies at the State level, such as Central Management Services.

5

Implementation Plan & Progress

Implementation Considerations

The BRC recognizes that the 27 recommendations detailed in this report represent more than a series of incremental changes; they are a call for a fundamental transformation of how Illinois plans, funds, and delivers transportation. Developed in close consultation with IDOT leadership and external stakeholders, these recommendations are designed to position Illinois as a national leader. Implementing this ambitious vision, however, will require time, effort, and a collective commitment from all parties. This is not a journey the IDOT can, or should, undertake alone. Meaningful and lasting change will demand a unified effort from the General Assembly, the private sector, local governments, and community advocates, all working in concert.

IDOT's Implementation Plan

IDOT has demonstrated a strong commitment to this transformation and intends to take full ownership of these recommendations by integrating them into its core departmental strategy. The Department will establish an internal governance structure to manage the implementation process, assigning clear executive leads for each of the 27 recommendations to ensure accountability and drive progress across its various offices and bureaus. This structure will be responsible for overseeing the translation of the BRC's high-level recommendations into a detailed and actionable work plan.

To translate these recommendations into concrete action, the executive leads will be charged with developing detailed implementation plans for each initiative. These work plans will identify the specific steps, timelines, required resources, and interim milestones necessary to achieve the desired outcomes. A focus of this effort will be the establishment of clear performance metrics and targets, which will allow the Department to track progress, measure success, and make data-driven adjustments as needed.

To ensure transparency and maintain momentum, IDOT will implement a robust tracking and oversight process for this entire transformation effort. The Department has committed to providing the ILGA and the public with annual updates on its progress, which will be delivered as part of its budget hearings. This recurring reporting will provide a formal mechanism for accountability and ensure that the implementation of the BRC's recommendations remains a top priority for the Department.

To achieve these commitments, the BRC recommends that IDOT develop a detailed implementation framework and utilize ongoing consultant support to ensure efficient delivery.

Implementation Considerations for ILGA

Many of the BRC's recommendations will require legislative action or budgetary support to be fully realized. The ILGA's partnership will be critical in providing IDOT with the necessary authority and resources to modernize its operations. Key areas for consideration include:

- **Statutory Flexibility:** Amending existing statutes to grant IDOT greater flexibility in areas such as procurement, land acquisition, and the use of innovative project delivery methods will be essential for accelerating project delivery.

- **Funding and Budgeting:** Authorizing and appropriating the necessary funds to support a strategic workforce expansion at IDOT, as well as providing dedicated funding for multimodal projects and sustainability initiatives, will be crucial for success.

- **Modernizing Revenue Sources**: Addressing the long-term solvency of the State's transportation funding by authorizing the study and implementation of new revenue mechanisms—such as road usage charging, tolling, and modernized vehicle fees—will ensure the system remains financially sustainable.

Implementation Considerations for Other Stakeholders

The successful implementation of these recommendations will depend on the active engagement and support of a wide and diverse range of external partners. The journey to transform Illinois transportation requires a broad coalition of stakeholders working in concert with IDOT and the General Assembly. Key areas for collaboration include:

- **Industry Partners (Consultants, Contractors, and Labor):** Continue to partner with IDOT on innovative project delivery methods, provide critical feedback on procurement processes, and co-invest in workforce development initiatives like apprenticeships and training programs to build the skilled labor force necessary to deliver the capital program.

- **Local and Regional Governments:** Collaborate with IDOT on integrated planning efforts to ensure State and local priorities are aligned, streamline permitting and approval processes, and provide consistent input on community needs to ensure transportation investments are equitable and effective.

- **Project Delivery Partners (Railroads and Utilities):** Engage in earlier and more proactive coordination during project planning and design to minimize delays associated with right-of-way, utility relocations, and railroad flagging. This includes working toward standardized agreements and communication protocols to create a more predictable project environment.

- **Advocacy, Environmental, and Community Groups:** Continue to engage in open and constructive dialogue with IDOT and the General Assembly, providing expertise, representing community interests, and championing the legislative and budgetary changes necessary to support a more modern, equitable, and sustainable transportation system.

- **Other Governmental Partners (e.g., Attorney General, Environmental Agencies):** Collaborate with IDOT to identify opportunities to streamline inter-agency processes, such as those for land acquisition and environmental permitting, to reduce administrative friction and accelerate project timelines while upholding all legal and regulatory responsibilities.

High-Level Implementation Targets & Progress to Date

The following table outlines high-level targets for each of the 27 recommendations provided by the BRC. These targets are intended to provide directional guidance as IDOT develops its detailed implementation plan, and to offer the Illinois General Assembly an initial view on the timing of potential legislative considerations. Upon completion of its detailed implementation plan, IDOT should continue to work closely with the ILGA to develop a coordinated effort to implement these recommendations and transform the Department. This collaborative effort will also require the active engagement of industry, advocates, and other partners to ensure a unified approach to modernizing Illinois's transportation system.

			Target Outcomes			*Implementation Status*	
			Within One Year... (Y1)	**Within Three Years...** (Y2)	**Within Five+ Years...** (Y5+)		
Objective #1: Accelerate Project Delivery							
1	**Implement Enhanced Project Management Practices**	IDOT	Pilot standardized project management procedures, data standards, and a dedicated project manager model in select districts while launching an internal project delivery dashboard.	Implement standardized practices and the internal dashboard statewide; establish a central team for large and complex projects; complete review of internal authority levels.	Use performance data to continuously refine project management practices and public-facing dashboards.	Active	▪ *IDOT began development of project status dashboard, including standardization of project data* ▪ *IDOT began designing a complex projects office, including meeting with other states to review leading practices* ▪ *IDOT updated its consultant budgeting form (CECS) to provide contingency budgets for continuity with Phase III* ▪ *IDOT began a review for adoption of a statewide shared digital platform for engineering plan reviews*
		ILGA	Consider legislation to streamline procurement for small and mid-range contracts and to enhance options for innovative project delivery methods (e.g., P3s, CMGC).	Establish a procurement exemption for transportation pilots.			

			Target Outcomes			Implementation Status	
			Within One Year... (Y1)	Within Three Years... (Y2)	Within Five+ Years... (Y5+)		
2	Improve Third-Party Coordination	IDOT	Establish formal protocols for engaging utilities and railroads early in project development and make progress on the application for NEPA assignment.	Fully implement early engagement protocols for all projects statewide and successfully achieve NEPA assignment from the Federal Highway Administration.	Continuously refine and update agreements with third parties, using performance data to streamline coordination and permitting for all projects.	Active	▪ *IDOT reached an agreement with the U.S. Army Corps of Engineers (USACE) for dedicated staff to expedite permit reviews* ▪ *IDOT is actively renegotiating their Programmatic Agreement with FHWA for Categorical Exclusions* ▪ *IDOT issued a notice of intent to FHWA to participate in the NEPA Assignment program*
		ILGA	Pass legislation to expedite land acquisition thresholds; authorize NEPA assignment; authorize continual ROW; streamline utilizes, railroad, and environmental coordination.				
3	Enhance Transparency and Partnership with Industry	IDOT	Begin publishing lookahead schedule for programming (MYP) and lettings (PTBs); establish regular industry collaboration forums; begin proactively engaging industry on complex projects.	Enhance scoping, change order, and contract negotiation processes; pilot extended bid timelines; and adopt digital delivery practices statewide.	Continuously refine coordination and transparency measures in partnership with industry.	Active	▪ *IDOT began development of a two-year lookahead schedule for PTBs and the MYP* ▪ *IDOT communicated ability of industry to compete on all bids*
		ILGA					

			Target Outcomes			Implementation Status	
			Within One Year... (Y1)	Within Three Years... (Y2)	Within Five+ Years... (Y5+)		
4	Implement Active Program Management Practices	IDOT	Develop and pilot a formal process to track project milestones and reallocate funds from delayed projects on a limited scale, while establishing a target for spending down the cash balance.	Implement the active program management and fund reallocation process for a large portion of the capital program, demonstrably reducing the cash balance.	Fully integrate active program management across the entire portfolio, using real-time data to optimize delivery, manage cash flow, and prioritize shovel-ready projects.	Active	▪ *IDOT reallocated $400 million in State funding to a new competitive grant program for "shovel-ready" local projects, demonstrating active management*
		ILGA					
5	Improve the Efficiency of the Programming Process	IDOT	Study benefits of extending the MYP horizon; establish and publish standardized statewide assumptions (e.g., for cost escalation and readiness) to be used in MYP development across all districts.	If beneficial, extend the MYP planning horizon; refine statewide assumptions.	Continuously improve the programming process.	Active	▪ *IDOT is in the process of providing a two-year lookahead schedule for its PTBs and the MYP*
		ILGA	Provide oversight and support for IDOT's efforts to standardize programming assumptions.	Support the transition to a longer planning horizon by aligning legislative reporting and funding cycles where appropriate.	Review results of federal fund concentration pilots and consider statutory changes if needed to provide long-term flexibility.		

			Target Outcomes			Implementation Status	
			Within One Year... (Y1)	Within Three Years... (Y2)	Within Five+ Years... (Y5+)		
6	Increase Delegation of Authority from IDOT to Local Agencies	IDOT	Develop a framework and criteria for delegating increased design review and letting authority, and launch a pilot program with select, qualified local agencies.	Expand the delegation pilot program to include more agencies and project types based on initial performance results and feedback.	Fully implement a statewide delegation program with clear certification standards and ongoing technical support for local partners.	Active	▪ *IDOT launched a $100 million Off-System Bridge Bundling Program, grouping up to 180 locally owned structures into efficient contract packages to streamline delivery and achieve economies of scale.* ▪ *IDOT is reviewing current financial contribution levels to determine how to adjust them based on the condition of the infrastructure and market conditions*
		ILGA	Authorize IDOT to delegate construction letting authority to certified local agencies.				
7	Streamline IDOT Oversight and Improve Visibility for Local Agencies	IDOT	Develop a consolidated Capital Grants Guide; establish predictable form management.	Publish an external-facing dashboard for local agencies to track project review status; pilot bundled procurement procedures for routine services.	Expand bundled procurement and continuously refine local agency support processes based on partner feedback and performance data.	Active	▪ *IDOT launched the public-facing Cash Balances Dashboard, enhancing financial transparency* ▪ *IDOT launched the Rebuild Illinois Accomplishment Dashboard*
		ILGA					

			Target Outcomes			Implementation Status	
			Within One Year... (Y1)	Within Three Years... (Y2)	Within Five+ Years... (Y5+)		
Objective #2: Expand Workforce Capacity							
8	**Expand IDOT's Headcount in Targeted Areas**	IDOT	Identify hiring target and develop near-term plan for hiring.	Achieve approximately 50% of the headcount growth target, focusing on critical project delivery, oversight, and strategic roles.	Reach the full headcount target of 6,400–7,000 FTEs and establish a permanent process for ongoing workforce needs assessment.	Active	▪ *IDOT set a goal to hire 600 new employees by the end of 2026* ▪ *IDOT began piloting new, faster approaches to onboarding talent, including using State Hiring Plans that don't require interviews for certain roles.*
		ILGA	Authorize and appropriate funding for the first phase of a strategic, multi-year workforce expansion at IDOT.	Continue to provide budgetary support for the phased hiring plan in subsequent annual budgets.	Continue to provide budgetary support for the phased hiring plan in subsequent annual budgets.		
9	**Reduce Time-to-Hire**	IDOT	Expand the use of accelerated hiring plans and continuously open requisitions for high-demand positions; work with CMS to formally update the CEP.	Work with CMS to further streamline approvals and delegate more hiring authority to IDOT; standardize hiring tools and processes statewide.		Active	▪ *In collaboration with CMS, IDOT reduced the number of steps in the hiring process from over 100 to just 16* ▪ *IDOT implemented a dashboard for real-time visibility into the hiring process*
		ILGA					

			Target Outcomes			Implementation Status	
			Within One Year... (Y1)	Within Three Years... (Y2)	Within Five+ Years... (Y5+)		
10	Improve IDOT Employer Competitiveness	IDOT	Analyze employee engagement survey results and develop a plan for workplace improvements.	Implement key improvements identified in the action plan, such as sustaining flexible work options and establishing new satellite offices.	Continuously monitor employee satisfaction and market trends.	Active	▪ *IDOT conducted an employee engagement survey to gather workforce perspectives* ▪ *IDOT opened a new satellite office in Champaign to enhance recruitment and work-life balance* ▪ *IDOT secured competitive salary increases for Civil Engineer Trainees and interns* ▪ *IDOT launched an "Intern to Hire" program to create a structured pathway to full-time employment*
		ILGA					
11	Augment Internal Resources with Alternative Staffing, Automation, and External Partnerships	IDOT	Increase the use of 75-day contract appointments and external service contracts for critical, time-sensitive functions like plan preparation.	Pilot automation for high-volume, routine processes such as invoice processing, permit applications, and document management.	Scale up successful automation initiatives to reduce manual workload and strategically redeploy staff to higher-value activities.	Not Started	
		ILGA					

			Target Outcomes			Implementation Status	
			Within One Year... (Y1)	Within Three Years... (Y2)	Within Five+ Years... (Y5+)		
12	Provide Operational Information Technology Authority to IDOT	IDOT	Work with DoIT to define a new collaborative model with clear service level agreements for routine and specialized IT needs.	Based on new authority from the ILGA, establish a more autonomous operational IT function, potentially with embedded DoIT staff.	Continuously refine partnership with DoIT.	Not Started	
		ILGA	Enact legislation to grant IDOT greater operational authority over its day-to-day IT functions and specialized transportation software, while preserving DoIT's enterprise oversight role.	Monitor the implementation of the new IT governance model to ensure it is achieving the intended efficiencies.			
13	Launch Workforce Development Programs	IDOT	Conduct a comprehensive workforce needs assessment in partnership with DCEO and industry; launch a pilot rotational fellowship program for non-engineering roles.	Based on the needs assessment, launch new or expanded partnerships with educational institutions and scale up the fellowship program.	Continuously refine workforce development programs.	Not Started	
		ILGA	Fund the comprehensive workforce needs assessment and authorize the creation of new fellowship and training programs.	Continue to provide budgetary support for workforce development programs.	Continue to provide budgetary support for workforce development programs.		

			Target Outcomes			Implementation Status	
			Within One Year... (Y1)	Within Three Years... (Y2)	Within Five+ Years... (Y5+)		
14	Enhance Human Resource Support Services	IDOT	Begin building strategic HR capabilities by hiring or training staff in data analytics, organizational development, and change management.	Fully establish HR as a strategic business partner with the capacity to lead proactive workforce planning and talent strategy.	Continuously leverage data and analytics to drive proactive workforce management, succession planning, and organizational improvements.	Not Started	
		ILGA					
15	Expand IDOT's Supportive Services for Small Businesses	IDOT	Establish statewide SBE criteria; clarify SBI eligibility; seek expansion of SBI to State and federal contractors.	Establish EDAs and related contracting instruments.	Implement operational enablers to support program delivery.	Active	▪ *IDOT initiated collaborative meetings to establish consistent statewide SBE certification criteria* ▪ *IDOT convened stakeholders to explore establishing EDA* ▪ *IDOT coordinated with the Illinois Tollway and the City of Chicago to discuss their SBIs programs, design, implementation and best practices*
		ILGA	Empower IDOT to facilitate financial assistant to EDAs and SBEs; establish statewide SBE reciprocity, provide ABI authority to IDOT.				

			Target Outcomes			Implementation Status	
			Within One Year... (Y1)	Within Three Years... (Y2)	Within Five+ Years... (Y5+)		
16	Expand Race- and Gender-Neutral Small Business Development Programs	IDOT	Reactivate the mentor-protégé program.	Pilot expanded business support services such as access to capital and bonding; enhance community outreach mechanisms.	Continuously improve small business support services.	Not Started	
		ILGA					
Objective #3: Maximize the Value of Investments							
17	Strengthen Metrics-Based Investment Goals	IDOT	Begin a comprehensive, statewide multimodal transportation needs assessment to quantify capital and operating costs across all jurisdictions and modes.	Complete the initial needs assessment and begin updating performance metrics in the LRTP to align with findings.	Regularly update the statewide needs assessment and fully integrate the updated performance metrics into all programming and project selection decisions.	Active	▪ *IDOT launched a major update to the LRTP, "Connecting Illinois 2050," with a focus on integrating equity and climate*
		ILGA	Fund the comprehensive statewide needs assessment.	Review the findings of the needs assessment and use it to inform future capital bill discussions and funding priorities.			

			Target Outcomes			Implementation Status	
			Within One Year... (Y1)	Within Three Years... (Y2)	Within Five+ Years... (Y5+)		
18	Expand the Flexibility of Funding Uses	IDOT	Pilot the use of a cross-modal funding pool for projects that advance specific State goals like emissions reduction, safety, or equity.	Expand the use of flexible funding across more programs, allowing for a mix of highway, transit, and active transportation solutions.	Implement a fully flexible funding framework that allows resources to be directed to the most critical investments that meet State goals, regardless of mode.	Active	▪ *IDOT's reallocation of $400 million to a competitive local grant program demonstrates a move toward more flexible use of funds across regions and project types*
		ILGA	Consider statutory changes, such as consolidating funds, to allow for greater funding flexibility across modes and regions.	Amend funding allocation formulas to be more dynamic and responsive to the needs identified in the statewide assessment.	Ensure any future capital bill preserves maximum flexibility for IDOT and partner agencies to allocate funds based on performance and need.		
19	Increase Flexibility of Funding for Locals	IDOT	Initiate discussions with federal partners (FHWA/FTA) to explore expanded eligibility and processes FFM.	Pilot an STP/MFT funding swap program with local agencies and pilot expanded FFM policies on select projects.	Fully implement the funding swap program and expanded FFM policies.	Not Started	
		ILGA	Authorize IDOT to establish and administer a funding swap program.	Authorize IDOT to credit local spending on early project phases toward federal match requirements.	Codify the funding swap and flexible match programs in statute to ensure their long-term availability for local governments.		

			Target Outcomes			Implementation Status	
			Within One Year... (Y1)	Within Three Years... (Y2)	Within Five+ Years... (Y5+)		
20	Prioritize Funding Improvements to Existing Assets	IDOT	Continue to apply the TAMP to prioritize "fix-it-first" projects and clearly quantify the preservation backlog.	Develop a formal "optimization-first" policy to evaluate and prioritize improvements to existing infrastructure before considering new capacity expansion projects.	Fully integrate the "optimization-first" principle into the LRTP and all capital programming decisions, making it the default approach for addressing system needs.	Active	▪ *The TAMP has successfully guided investments that increased the percentage of interstate pavements in acceptable condition*
		ILGA	Support the "fix-it-first" principle by prioritizing funding for maintenance and preservation in annual budgets and future capital bills.				
Objective #4: Drive Sustainable Outcomes							
21	Implement Foundational Components for a Sustainable Program	IDOT	Establish a central function or office to lead sustainability efforts and adopt a formal, updated definition of sustainability for the department.	Integrate clear sustainability goals and performance metrics into the LRTP and other key planning documents; develop a long-term funding plan for sustainability.	Continue integrating sustainability into all aspects of planning, design, and operations, with a dedicated team and consistent performance tracking.	Not Started	
		ILGA	Set statewide sustainability goals and targets for the transportation sector (e.g., GHG reduction, VMT reduction).	Provide funding for IDOT to implement its sustainability program plan.			

			Target Outcomes			Implementation Status	
			Within One Year... (Y1)	Within Three Years... (Y2)	Within Five+ Years... (Y5+)		
22	**Implement Climate Mitigation Measures to Reduce GHG Emissions**	IDOT	Finalize and begin implementation of the State's Active Transportation Plan while continuing to administer NEVI-funded EV charger deployment.	Develop and pilot programs to support "last-mile" EV charging and incentivize the use of low-carbon construction materials.	Implement a comprehensive, portfolio-based mitigation program that includes fleet conversion, land redevelopment, and expanded transit services.	Active	▪ *IDOT awarded $18.4 million in grants for 167 new EV charging ports* ▪ *IDOT began powering a maintenance facility with solar panels* ▪ *IDOT advanced research in sustainable materials through a renewed partnership with the Illinois Center for Transportation (ICT)*
		ILGA		Expand EV purchase incentives and consider legislation to promote active transportation and sustainable land use near transit.			
23	**Implement Climate Adaptation Measures to Manage Risks**	IDOT	Begin a recurring, statewide, multimodal climate risk assessment to inform the development of a RIP.	Complete the initial risk assessment and develop an agency-wide RIG for project design.	Fully integrate the RIG into the BDE Manual and implement a comprehensive, multimodal climate adaptation strategy.	Active	▪ *IDOT began meeting to update the Statewide Climate Risk Assessment for IDOT through the RIP*
		ILGA	Establish an interagency climate data policy to ensure all State agencies use consistent climate projections.				

			Target Outcomes			Implementation Status	
			Within One Year... (Y1)	Within Three Years... (Y2)	Within Five+ Years... (Y5+)		
24	Expand Community Resilience Support	IDOT	Pilot expanded community impact strategies on select projects to provide tangible community benefits and restorative justice beyond simple mitigation.	Develop a formal process for ensuring community resilience measures identified in project assessments are fully implemented by contractors.	Fully integrate community resilience and environmental justice principles into all relevant programs and project delivery processes.	Not Started	
		ILGA			Strengthen displacement and relocation assistance statutes to provide more equitable relief for communities impacted by projects.		
Objective #5: Secure Adequate Funding Sources							
25	Support Investment with New Revenue Sources	IDOT	Initiate process to seek approval to toll interstates.	Initiate and manage a tolling implementation plan; secure federal tolling authority for early identified opportunities; launch RUC pilot.	Implement tolling and managed lanes projects; conclude RUC pilot.	Not Started	
		ILGA	Authorize IDOT and/or Tollway to toll corridors identified as near-term priorities and to seek federal approval to carry out tolling; create a Transportation Funding Coordination Committee, authorize IDOT to study statewide MVR fee configurations, heavy vehicle fees, and carbon pricing; authorize IDOT to study and pilot RUC.	Adjust tolling statues based on program progress; enact near-term revenue modernization initiatives (e.g., indexing MVR, retail delivery fee, statewide TNC fee); Transportation Funding Coordination Committee convenes and monitors IDOT studies.	Act on recommendations from Transportation Funding Coordination Committee.		

			Target Outcomes			Implementation Status	
			Within One Year... (Y1)	Within Three Years... (Y2)	Within Five+ Years... (Y5+)		
26	Advance the Next Capital Bill	IDOT	Continue to demonstrate responsible stewardship by actively managing and spending down the existing capital cash balance on ready projects.	Use the completed statewide needs assessment to develop data-driven scenarios for the scale, scope, and priorities of a future capital bill.	Collaborate with the ILGA to provide the detailed justification and project pipelines needed to support passage of the next capital bill.	Not Started	
		ILGA		Use the findings from the statewide needs assessment to begin framing the priorities and funding levels for the next capital bill.	Develop and pass the next major capital bill, with funding levels and priorities informed by the BRC recommendations and the needs assessment.		
27	Ensure Adequate Budget for Implementing BRC Recommendations	IDOT	Incorporate the initial resource needs for implementing high-priority BRC recommendations into the upcoming annual operating budget request to GOMB.	Work with GOMB and the ILGA to secure the first phase of dedicated operating budget increases to support workforce expansion and new programs.	Fully fund the permanent operating budget requirements necessary to sustain all BRC-recommended initiatives and the expanded workforce.	Not Started	
		ILGA	Approve initial operating budget increases to allow IDOT to begin implementing key BRC recommendations.	Approve subsequent phases of operating budget increases to support the multi-year implementation plan.	Ensure IDOT's base operating budget is structurally sufficient to support a modernized, higher-capacity agency in the long term.		

6

Concurring Views of BRC Members

No concurring views were provided by BRC Members

G

Glossary

Glossary of Terms

AASHTO – American Association of Highway and Transportation Officials

ACEC – American Council of Engineering Companies

ACOE – Army Corps of Engineers

ADA – Americans with Disabilities Act

AG – Attorney General

AGC – Associated General Contractors of America

AI – Artificial Intelligence

APD – Alternative Project Delivery

ATC – Alternative Technical Concept

ATP – Active Transportation Plan

BABAA – Build America, Buy America Act

BDE – Bureau of Design and Engineering

BEP – Business Enterprise Program

BIP – Bureau of Information Processing

BLS – Bureau of Labor Statistics

BNEF – Bloomberg New Energy Finance

BRC – Blue-Ribbon Commission

BRT – Bus Rapid Transit

C2D – Commitment to Diversity

CAA – Clean Air Act

Caltrans – California Department of Transportation

CARB – California Air Resources Board

C-CAP – Comprehensive Climate Action Plan

CDFIs – Community Development Financial Institutions

CE – Categorical Exclusion

CEI – Commission on Equity and Inclusion

CEJA – Climate and Equitable Jobs Act

CEP – Comprehensive Employment Plan

CM/GC – Construction Manager/General Contractor

CMAP – Chicago Metropolitan Agency for Planning

CMS – Central Management Services

CN - Canadian National (Railway)

COOP – Cooperative Education Program

CPKC - Canadian Pacific Kansas City

CPI-U – Consumer Price Index for All Urban Consumers

CREATE – Chicago Region Environmental and Transportation Efficiency Program

CSX - CSX Transportation

CTA – Chicago Transit Authority

DB – Design-Build

DBE – Disadvantaged Business Enterprise

DCEO – Department of Commerce and Economic Opportunity

DDD – Data-Driven Decisions

DEI – Diversity, Equity, and Inclusion

DNR – Department of Natural Resources

DoIT – Department of Innovation & Technology

DOT – Department of Transportation

ECI – Early Contractor Involvement

ECMS – Engineering and Construction Management System

EDA – Economic Development Area

EDC – Economically Disadvantaged County

EIA – U.S. Energy Information Administration

EJ – Environmental Justice

ESBE – Emerging Small Business Enterprise

EV – Electric Vehicle

FAA – Federal Aviation Administration

FAST – Fixing America's Surface Transportation

FDOT – Florida Department of Transportation

FFM – Federal Flexible Match

FHWA – Federal Highway Administration

FRA – Federal Railroad Administration

FTA – Federal Transit Administration

FTE – Full-Time Equivalent

FY - Fiscal Year

GHG – Greenhouse Gas

GOMB – Governor's Office of Management and Budget

HBCUs – Historically Black Colleges and Universities

HCCTP – Highway Construction Careers Training Program

HIP – Highway Improvement Program

HR – Human Resources

HSIP – Highway Safety Improvement Program

HTF – Highway Trust Fund

IASP – Illinois Aviation System Plan

ICC – Illinois Commerce Commission

ICT – Illinois Center for Transportation

IDNR – Illinois Department of Natural Resources

IDOT – Illinois Department of Transportation

IEMA – Illinois Emergency Management Agency

IEPA – Illinois Environmental Protection Agency

IFA – Illinois Finance Authority

IFR – Interim Final Rule

IHDA – Illinois Housing Development Authority

IIJA – Infrastructure Investment and Jobs Act

IL UCP – Illinois Unified Certification Program

I-LAST – Illinois Livable and Sustainable Transportation

ILGA – Illinois General Assembly

IMTS – Illinois Marine Transportation System

INDOT – Indiana Department of Transportation

IT – Information Technology

ITEP – Illinois Transportation Enhancement Program

ITS – Intelligent Transportation Systems

KPIs – Key Performance Indicators

LAP – Local Agency Program

LPAs – Local Public Agencies

LRTP – Long-Range Transportation Plan

MDOT – Michigan Department of Transportation

MFT – Motor Fuel Tax

MnDOT – Minnesota Department of Transportation

MoDOT – Missouri Department of Transportation

MOU – Memorandum of Understanding

MPO – Metropolitan Planning Organization

MVR – Motor Vehicle Registration

MWD – Measurement-While-Drilling

MYP – Multi-Year Program

NCDOT – North Carolina Department of Transportation

NEPA – National Environmental Policy Act

NEVI – National Electric Vehicle Infrastructure

NHCCI – National Highway Construction Cost Index

NITA – Northeastern Illinois Transit Authority

ODOT – Ohio Department of Transportation

OIPI – Office of Intermodal Project Implementation

P3 – Public-Private Partnership

PACE – Professional Advancement of Civil Engineers

PAYGO – Pay-As-You-Go

PennDOT – Pennsylvania Department of Transportation

PMIS – Project Management Information System

PTB – Professional Transportation Bulletin

PTC – Positive Train Control

REV – Reimagining Energy and Vehicles

RFI – Request for Information

RFP – Request for Proposal

RIG – Resilient Infrastructure Guide

RIP – Resilience Improvement Plan

ROCIP – Rolling Owner Controlled Insurance Program

ROW – Right-of-Way

RPOs – Regional Planning Organizations

RTA – Regional Transportation Authority

RUC – Road Usage Charge

SB – Senate Bill

SBE – Small Business Enterprise

SBI – Small Business Initiative

SPOT – Strategic Prioritization Office of Transportation

STIP – Statewide Transportation Improvement Program

STP – Surface Transportation Program

TAM – Transit Asset Management

TAMP – Transportation Asset Management Plan

TDD – Transportation Development District

TIP – Transportation Improvement Plan

TNC – Transportation Network Company

TOD – Transit-Oriented Development

TxDOT – Texas Department of Transportation

USACE – U.S. Army Corps of Engineers

USDOT – U.S. Department of Transportation

UTP – Unified Transportation Program

VDOT – Virginia Department of Transportation

VMT – Vehicle Miles Traveled

WSDOT – Washington State Department of Transportation

ZEV – Zero-Emission Vehicle

A1

Appendix 1: Public Involvement

Overview

Public outreach has been a critical component in developing the BRC's Final Report. To actively engage the public throughout this effort, several initiatives were implemented to gather input from public agencies, advocates, and industry representatives. This appendix outlines the public information tools and techniques used during the development of the BRC's Final Report.

Public Involvement Efforts

Public Commission Meetings:

Throughout its work, the BRC held 19 public meetings, which ensured a transparent process and provided opportunities for public engagement. These meetings, which were advertised in advance, were open to all members of the public. A dedicated portion of each meeting was reserved for public comment, which created a consistent and open forum for residents, advocates, and industry stakeholders to voice their perspectives, share insights, and provide direct feedback to the Commissioners. This public input was a valuable component of the BRC's deliberations. The following is a list of organizations that provided public comment:

- Natural Resources Defense Council
- Metropolitan Planning Council
- Rocky Mountain Institute
- Faith in Place
- Active Transportation Alliance
- Illinois Clinicians for Climate Action
- Better Streets Chicago

BRC Webpage:

IDOT's website includes a page dedicated to information about the BRC's origins, members, and meetings.[62] All meeting agendas, presentations, and meeting minutes from the five BRC meetings held in 2025 were posted to the webpage to provide public access to meeting materials.

Stakeholder Interviews:

The BRC's Final Report encompasses the input of over 80 external stakeholder interview participants. Most interviews took place from February through May 2025, with additional outreach conducted in June and July. This feedback provided invaluable insight into IDOT's challenges and opportunities. Discussion topics included questions related to IDOT's workforce, project delivery, governance, funding, equity, and sustainability. The following is a list of organizations that participated in stakeholder interviews:

[62] BRC Webpage

- Active Transportation Alliance
- American Council of Engineering Companies of Illinois
- Bi-State Regional Commission
- Center for Neighborhood Technology
- Champaign County Regional Planning Commission
- Chicago Department of Transportation
- Chicago Metropolitan Agency of Planning
- Connect Transit
- Cook County Department of Transportation and Highways
- DuPage County Division of Transportation
- East-West Gateway Council of Governments
- Illinois Asphalt Pavement Association
- Illinois Association of County Engineers
- Illinois Association of General Contractors
- Illinois Clean Jobs Coalition
- Illinois Concrete Pavement Association
- Illinois Department of Central Management Services
- Illinois Department of Innovation and Technology
- Illinois Department of Transportation
- Illinois Governor's Office
- Illinois Municipal League
- Illinois Public Transportation Association
- Illinois Railroad Association
- Illinois Road and Transportation Builders Association
- Illinois Tollway
- Kane County
- Metra
- McLean County Planning Commission
- Metropolitan Planning Council
- Natural Resources Defense Council
- Region One Planning Council
- Rocky Mountain Institute
- Southwestern Illinois Metropolitan and Regional Planning Commission
- Springfield Area Transportation Study

External Project Delivery Working Group:

To gain further insight into project delivery, an External Project Delivery Working Group was established comprising representatives from private industry and public agencies. The group was tasked with developing near-term, mid-term, and long-term recommendations to enhance the speed and efficiency of IDOT's project delivery while maintaining quality standards. This working group convened four times over the course of several weeks in 2025 to deliberate and formulate its recommendations to the BRC.

Other Correspondence:

While the BRC was developing this Final Report, the Commission received several pieces of correspondence. These comments and IDOT's responses are summarized in the table below:

Organization(s)	Correspondence	BRC Response
Illinois Clean Jobs Coalition	The Illinois Clean Jobs Coalition sent a letter to the BRC providing input on creating a more equitable transportation system in Illinois. Refer to *Attachment A1.1* for the full letter. Additionally, the Illinois Clean Jobs Coalition shared the Natural Resource Defense Council's State Transportation Scorecard: Executive Summary and State Transportation Scorecard: Midwest with the BRC for consideration in IDOT's efforts to reduce GHG emissions.	Language added in Recommendation #15 Expand IDOT's Supportive Services for Small Businesses; #16 Expand Race and Gender-Neutral Small Business Development Programs; #22A Update Design Specifications for Low Carbon Materials; #22E Redevelop IDOT Land to Support GHG Goals; and #22F Implement and Support Zero-Emission Government Fleet Conversion
Natural Resource Defense Council, Metropolitan Planning Council, and Rocky Mountain Institute	The Natural Resource Defense Council, in partnership with the Metropolitan Planning Council and Rocky Mountain Institute, sent a memo to the BRC Sustainability Working Group for consideration in increasing IDOT's current transportation offerings. Refer to *Attachment A1.2* for the full memo.	Language added in Recommendation #22D Expand IDOT's Services for Transit

Attachment A1.1:

Illinois Clean Jobs Coalition Letter to the BRC

Date: May 9, 2025

To: Secretary Biagi & Members of the Blue Ribbon Commission on Transportation

We write to you as the Illinois Clean Jobs Coalition, a statewide coalition working to improve public health and the environment, protect consumers, and create equitable clean energy jobs. We are grateful for the work undertaken by the Blue Ribbon Commission to chart a path for Illinois' future that takes on two vital themes: equity and sustainability.

There is an urgent need for Illinois to invest in transportation options that center affordability, safety, health, and accessibility in creating an equitable transportation system. Our present transportation system is inequitable because transportation in much of the state is limited to one particular mode: personal automobile travel. Those limits create winners and losers in the transportation system:

- Vehicle costs are rising: $47,962 for an average new car even before the impacts of tariffs fully show themselves[1], and $25,180 for a used car[2]. New electric vehicles currently cost 12% more up front, but switching to zero-emission vehicles will save Illinois car owners $19,000 over the lifetime of their vehicle in avoided fuel and maintenance costs.[3]
- Car expenses are regressive - low income households tend to spend more relative to their income.
- Particulate air pollution from on-road vehicles disproportionately affects communities of color in Illinois, with the following groups having significantly higher exposure than the average Illinoisan: Asian Americans (30% higher), African Americans (21% higher), Latinos (19% higher)[4].
- Extreme heat and smog – both increasing as a result of climate change – disproportionately impact low income Illinoisans, both residents of urban areas and agricultural workers.[5]
- In IDOT's 2023 Vulnerable Road User safety assessment, of the 297 miles of roadway earning "high-injury" status, 52% of those miles are in disadvantaged areas as defined by Justice40 data.[6]

To address these inequities, Illinois can draw lessons from peer states who are making investments in transportation options that support equity and reduce climate pollution. We direct you to the State Transportation Scorecard published by the Natural Resources Defense Council, which ranks Illinois as 31st in the country for transportation equity and climate policies and outcomes. See below for scorecard research that outlines areas where Illinois can improve.

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[1] https://www.kbb.com/car-news/average-new-car-price-held-steady-in-tariff-sales-surge/
[2] https://www.kbb.com/car-news/average-used-car-price-starts-to-rise/
[3] https://www.erm.com/globalassets/documents/reports/illinois_acc_ii_report_2023.pdf
[4] https://blog.ucs.org/dave-reichmuth/exposure-to-air-pollution-from-vehicles-in-illinois-is-inequitable-it-doesnt-have-to-be/#:~:text=The%20results%20are%20clear:%20the,the%20average%20for%20the%20state
[5] https://www.nrdc.org/sites/default/files/climate-change-health-impacts-illinois-ib.pdf
[6] https://idot.illinois.gov/content/dam/soi/en/web/idot/documents/transportation-system/manuals-guides-and-handbooks/safety/il-dot-vru-2023-11142023-final-spreads.pdf

State/Region	Final Scores	Rank	State Planning	Vehicle Electrification	Expanding Transportation Choices	System Efficiency	Embodied Emissions
Total Points	100		19	34	32	7	8
Illinois	17.1	31st	1.3	7.1	2.3	6.4	0.0

Table: Jessica Russo for NRDC

NRDC

To build an equitable transportation system, the State of Illinois needs to invest in affordable, accessible, clean transportation options by taking measures such as:

- Increasing state spending on transit. IL spent an average of $43.38 per capita between 2020-2022, well below the U.S. average of $58.42 per capita, or the Midwest leader, Minnesota, which spent 75% more per capita than IL ($76.16).
- Setting specific targets and concrete plans to reduce greenhouse gas emissions and vehicle miles traveled from the transportation sector, which is the fastest growing sector for GHG emissions.
- Investing more in bike/pedestrian projects. In Illinois, highway spending is 168 times higher than projects for pedestrians and cyclists. By comparison, Ohio is the leading Midwest state with a 45:1 ratio of highway to active transportation spending.
- Addressing the safety risks that people biking and walking face in Illinois, as the state ranks *fifth worst* in safety: twelve non motorized fatalities and serious injuries per 100,000 people in 2022, or an annual average of 1,461 across the state.
- Increasing EV charging ports in the state. Illinois has made progress in the availability of EV charging ports yet still has room for improvement. Illinois has 1 fast charger per 10,000 people (U.S. average is 1.4), and 2.2 level two chargers per 10,000 people (U.S. average is 4.4). This equates to IL ranking 40th for fast chargers and 36th for level two ports.

We thank you for your consideration and work to improve Illinois' transportation system. The expertise on this Commission can support IDOT and the State of Illinois in creating an equitable transportation system with more transportation options by investing in multiple modes that center affordability, safety, health, and accessibility.

Signed,
Members of the Illinois Clean Jobs Coalition

Cc: Deputy Governor Bria Scudder

Attached:

- State Transportation Scorecard Executive Summary
- State Transportation Scorecard Midwest Fact Sheet

Attachment A1.2:

NRDC Memo to BRC Sustainability Working Group

Date: September 16, 2025

To: Commissioner Love and Consultants to the Blue Ribbon Commission on Transportation

We are grateful for the work undertaken by the Blue Ribbon Commission to chart a path for Illinois' future that takes on the critical need to increase transportation choices in our state so that every Illinoisan can equitably access jobs, healthcare, education, and recreation. We need to shift our planning focus away from the "moving the most vehicles" mode. Instead, we need to design and build streets that are multi-use, human-scale corridors that are platforms for businesses and communities. Doing so will require increasing accessibility, sustainability, and affordability through more transportation choices. We cannot rely on private sector development and federal action, things outside of our states control, to carry us toward this vision: state agencies must take bold action by providing more transportation options beyond car travel. Change in the transportation sector has always been driven by bold government action and we encourage the BRC to meet this critical moment with bold recommendations.

Doing this requires changes to the way IDOT delivers projects, but other states are paving the way and we can learn from them to reduce the burden on IDOT staff to start from zero. Policy and technical changes to incentivize more climate friendly travel include:

1. Create a cross functional team within the department to deliver the strategies and tactics needed to achieve emissions reductions.
    a. The need for a specific set of staff to implement GHG reduction policies across the agency. Colorado and Minnesota's attempts to reduce climate emissions through VMT reductions have included investments in staffing to accomplish the necessary cross functional nature of reducing emissions from the statewide transportation improvement program.
    b. This includes the authority to enforce necessary changes in programming and planning at IDOT to ensure that projects being planned and delivered are achieving necessary reductions in emissions.
    c. State DOTs that have this policy require new staff to come aboard:
        i. MN and CO have ~3 FTE on it
        ii. CA has an entire VMT reduction branch 5-10 staff
        iii. Deputy commissioner level champions are helpful for implementation within DOT's
    d. Real fiscal notes for similar policies below, including FTE and consultant estimates:

Fiscal Notes from Other States with Similar Legislation, FTE estimates:

State Fiscal Note (linked)	***Total Lane Miles (FHWA)***	***Relative Lane Miles to Maine***	***FTE for bill***	***Recurring Costs (FTE, etc.)***	***One-time costs (Modeling, Consultants)***

Maine (2025) "Act to Reduce Pollution Associated with Transportation…"	*46,750*	*100%*	*2.0*	*$376,204*	*$600,000*
Minnesota (2023) "Transportation Greenhouse Gas Emissions Impact Assessment"	*290,618*	*622%*	*3.6*	*$769,111*	*$400,000*
Colorado (2021) "Capacity project requirements"	*185,486*	*397%*	*3.0*	*$420,000*	*$0*
Washington (2008) Section 8	*167,632*	*358%*	*2.0*	*$50,000*	*$0*
Maryland (2024) Transportation and Climate Alignment Act	*71,129*	*152%*	*N/A*	*$100,000*	*$600,000*

2. Set VMT reduction targets as a mechanism to achieve GHG reduction targets. Other states have begun by estimating reductions on a regional/county level, and IDOT can do the same to set realistic VMT reduction targets for IL regions.
    a. IDOT's annual Illinois Travel Statistics has breakdowns of VMT by IDOT district, major metros, and MPOs and by roadway functional class within each area. There's more VMT data, including a breakdown by county, in the Statewide Vehicle Miles of Travel section.
    b. IDOT could get a rough idea of GHG attributable to each area by multiplying the GHG per VMT unit factor against the VMT attributable to each area. In a similar way one could assign GHG/VMT reduction targets—e.g., a 20% decrease in VMT x GHG per VMT unit = GHG reduction target. **This would specifically allow for VMT reductions to be tailored to counties that can actually leverage alternative modes while focusing other GHG reducing mechanisms in more rural counties (like alternative fuels and ZEVs).**
    c. Free and reliable tools, like **MnDOTs Carbon Emissions Tool** and **Georgetown Climate Centers TEA-CART tool,** can estimate the GHG and VMT reductions of

specific project level investments/lane miles using local traffic data to a high degree of accuracy for planning.

3. Develop a suite of policies and tactics to reach VMT reduction goals. This could include:
    a. Roadway pricing as a mechanism to reduce VMT (e.g. tolling).
    b. Pricing strategies from FHWA to reduce VMT, such as the parking cash out policy being pursued in Massachusetts. Parking cash-out modifies existing employer-provided parking-only commute benefits to reward employees for using alternative transportation, while allowing employees who elect to continue to drive to and park at work to do so without penalty. Employers that choose to subsidize employee parking would be required to also provide an equivalently-valued subsidy for those not driving to and parking at work. Both employers and employees benefit from parking cash-out, since employees who accept the cash-out offer experience increased incomes, funded by savings from employers' reduced business expenses (because of not having to lease or otherwise subsidize as much parking).
    c. Increasing transit access and pedestrian safety: Using IDOT funding to directly invest in transit accessibility will support reductions in VMT. Supporting biking and walking safety infrastructure will also support VMT reductions by encouraging use of those modes.
4. Adjust IDOT travel demand models to incorporate induced demand to allow for greater VMT reductions.
    a. In 2025 USDOT published a playbook with a section on "Improved Travel Demand Modeling"
        i. Best practices included:
            1. Using new "activity based" models instead of antiquated "4 step models" to capture dynamic human behavior rather than static trip assignment
            2. Accounting for induced travel early in project planning with nationally accepted elasticity values
            3. Using elasticity based approached, NSCT induced demand calculator
    b. Minnesota, for example, has issued guidance to achieve their "driving down emissions framework" which sets declining VMT goals with a focus on highway expansion.
        i. To achieve the VMT goals, MN has funded new activity based models, but in the meantime, when a new highway expansion is proposed, MPOs can use existing TDMs to comply. But the VMT forecast results must concur within 20% of a science based, elasticity equation to accurately forecast the new traffic a highway project might add. Then, after the forecast the induced VMT, MN requires that VMT to be offset with VMT reducing projects before the expansion can be entered into a TIP.
        ii. Easy, free tool called the Carbon Emissions Tool
            1. Which can project the VMT reduction benefits of a suite of projects, from transit to TDM to active transport
            2. They pair those projects with multimodal investments
    c. California uses a very similar approach (guidance updated 2025), though they

exempt induced freight VMT from the process.

   d. Colorado uses activity-based models to do the above
      i. Colorado DOT and Cambridge Systematics projected $40 B in net benefit by using this approach from reduced operation costs and improved safety.

5. Define metrics outside of GHG and VMT reductions to further support decision making on project planning and delivery. These could include:
   a. Energy efficiency of the transportation system: Do VMT reductions and/or shift to ZEVs mean less energy is being consumed by the transportation system and does this result in lower GHGs? Developing an energy efficiency measure for the transportation system akin to the energy efficiency measures for the building or the industrial sectors could supplement GHG/VMT reduction targets.
   b. Proximity measures: Measuring how close people are to some key life destinations—e.g., nearest school, hospital, grocery store—and make it a goal to prioritize bringing such destinations closer to people (and vice-versa).
      i. For example, IDOT prioritizes roadway improvements—including Complete Streets treatments—that assist in siting schools in walkable/bikeable areas rather than on the outskirts of communities.Through this metric, provide an incentive for IDOT to reduce the number and distance of trips people have to take to access their regular destinations.
   c. Affordable transportation: Number and percentage of people within each jurisdiction with walking (up to half mile) access to affordable transportation options at least 18 hours/7 days week and 12 hours/5 days week. Affordable transportation includes fixed route (30 minutes or less headways), paratransit, and dial-a-ride service. Goal is to increase mobility options for more people
   d. Average household cost for transportation: Affordability should be a key component of IDOT's program development, and creating or incentivizing more affordable options than car travel aligns with GHG goals to reduce VMT.


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