

We are in a critical moment for the future of the Chicago area's transportation network. A wealth of federal and state funds provides opportunities to transform our streets and improve quality of life in communities across the region. We are excited about the potential for the updates to the regional plan to result in progress on our shared safety, equity, and sustainability goals. This will not happen, however, if CMAP takes a "business as usual" approach with this update and advances projects that increase emissions and make our streets less safe for everyone.

The current list of new regionally significant projects includes a troubling number of arterial widening proposals. It is well documented how recent spikes in traffic crashes, serious injuries, and fatalities can be attributed to safety issues on arterial streets. These streets already divide communities and are unsafe and uncomfortable for people walking and biking. Widening them only makes these problems worse while encouraging more people to drive and increasing emissions.

Evidence shows adding lanes to expressways and arterials does not result in long-term congestion relief for people driving because any new capacity is quickly filled up by additional cars and trucks, leading to more emissions. CMAP's current scoring criteria fail to account for this reality. In fact, projects that add new lanes to expressways are shown to *reduce* emissions because of supposed increases in speeds. For individual projects that add lanes to arterials, emissions impacts are not considered at all.

In ON TO 2050 we as a region committed to [creating a modern, multimodal transportation system](#) that [reduces greenhouse gas emissions](#) and doubles transit ridership from 2018 levels. Adding 158 additional lane miles of interstates and 141 lane miles of arterials, as this list would do according to analysis by the Metropolitan Planning Council, is entirely inconsistent with this goal. To improve safety, equity, and sustainability, we need to make it easier for people to drive less - not fund projects that make it easier for them to drive more.

These arterial widening projects are often framed as multimodal projects and awarded Complete Streets points from CMAP because they include enhanced painted crossings for people walking or marked shared lanes for people biking. This approach is flawed because it fails to acknowledge the negative effects of more car and truck traffic on people on foot and on bikes. Any incremental benefits from additional paint are quickly washed out by longer pedestrian crossing distances and more high-speed traffic.

CMAP needs to develop a better way to evaluate and score these projects that fully accounts for their long-term impacts. Factors beyond vehicle speed and free-flowing traffic must be more effectively measured and factored into funding decisions, particularly safety, equity, and sustainability.

We urge you to remove the widening projects from this list to allow more time to fully evaluate their potential impact on the region's safety, climate, and equity goals. This is consistent with [guidance from the Federal Highway Administration](#) calling for states to use new federal funds to prioritize projects that fix existing infrastructure and support multimodal travel above projects that expand road capacity.

CMAP should work with partners to [explore new USDOT tools to support agencies flexing highway funds](#) to projects that better deliver on safety, accessibility, and connectivity goals. CMAP staff should update and improve evaluation and scoring criteria to better reflect the long-term costs and effects of each project. Committees like this one should be provided with more

information and analysis before being asked to weigh in on whether these projects should be prioritized for funding.

This list features more of the same widening and resurfacing projects while doing little to change the fundamental flaws in our transportation network. From both an equity perspective and a sustainability dimension, persisting on this course would be a tragic missed opportunity.

Signed,

Active Transportation Alliance  
Center for Neighborhood Technology  
Climate Reality Project, Chicago Metro Chapter  
Environmental Law & Policy Center  
Shared-Use Mobility Center  
Illinois Environmental Council  
Illinois PIRG  
Illinois Sierra Club Chapter  
NRDC (Natural Resources Defense Council)  
Respiratory Health Association