

SECTION 5

Coordination

IDOT has provided early, frequent, and meaningful opportunities for residents, business owners, municipalities, resource agencies, and other stakeholders to participate in the study process. NEPA, SAFETEA-LU, and IDOT's CSS policy require the integration of public and agency interaction into the process for developing transportation improvements. As such, the SIP developed for the project was designed to provide a structured program for agency coordination and public involvement that complies with state and federal regulations and addresses the unique coordination and communication needs of the project. Because the project requires consideration of multiple modes of transportation and affects many different communities, the plan was designed to foster communication among the general public, resource agencies, and local governmental officials on project issues and types of improvements needed, and to build consensus for a preferred transportation solution. This section summarizes the agency coordination and public involvement activities that occurred during the EO-WB study, and the involvement of residents, community groups, and other stakeholders.

5.1 Compliance with Federal Coordination Regulation

The SAFETEA-LU legislation, specifically Section 6002, requires additional involvement opportunities for federal, state, and local agencies and the public for projects requiring an EIS. The legislation created a new category of participation in the consultation and input process for studies like the EO-WB with the goal of enhancing agency and public participation. The participating agency category was created to ensure that all interested agencies have an opportunity to be involved in the study and environmental review process. Table 5-1 lists the coordination activities undertaken during the project to comply with Section 6002 requirements. Minutes prepared for those activities are included in the official project record.

5.1.1 Cooperating Agencies

Cooperating agency status is invited by the lead agencies or sponsors of an EIS (see Appendix D for invitation letters). The joint lead agencies for preparing this Tier One EIS are IDOT and FHWA. In accordance with NEPA, a cooperating agency is any federal agency that has jurisdiction by law or special expertise with respect to any environmental impact of a proposed project. When the effects are on lands of interest to a Native American tribe, a state or local agency of similar qualifications may by agreement with FHWA and IDOT be a cooperating agency. Cooperating agencies are permitted, by request of the lead agency, to assume responsibility for developing information and preparing environmental analyses for topics about which they have special expertise. Furthermore, they may adopt a lead agency's NEPA document when, after an independent review of the document, they conclude that their comments and suggestions have been satisfied.

TABLE 5-1
Section 6002

Section 6002 Requirement	Location of Description of Activity
Identify participating and cooperating agencies, and place notification letters on participating and cooperating agency status in project file.	Subsection 5.1 of the Draft EIS, and the Stakeholder involvement plan / coordination plan
Determine and document lead/joint lead agency status.	Subsection 5.1.1 of the Draft EIS, and the Stakeholder involvement plan / coordination plan
Develop coordination plan in consultation with participating agencies and file.	Stakeholder involvement plan / coordination plan
Identify schedule for environmental review process with participating agencies and file.	Time duration agreement in stakeholder involvement plan / coordination plan (updated regularly)
Give opportunity for participating agencies and the public to provide input during development of purpose and need and document involvement.	Subsections 1.2 and 5.1.2 of the Draft EIS
Give opportunity for participating agencies and the public to provide input during development of range of alternatives and document involvement.	Section 3 and subsection 5.1.2 of the Draft EIS
Coordinate with participating agencies to identify appropriate methodology to be used and level of detail required in analysis and document.	Sections 2, 3, and 5 of the Draft EIS

Agencies invited to serve as cooperating agencies for the project are included in Table 3-2 of the SIP (FHWA and IDOT, 2009). The IDNR and TSA accepted the lead agencies' requests to be cooperating agencies. The responsibilities listed below are in addition to those typical of cooperating agencies:

- Identify issues of concern regarding the project's potential environmental and socioeconomic impact as early as possible
- Communicate issues of concern formally in the EIS scoping process
- Provide input and comment on the purpose of and need for the project
- Provide input and comment on the procedures used to develop alternatives and to analyze impacts
- Provide input on the range of alternatives to be considered
- Provide input and comment on the sufficiency of environmental impact analyses

5.1.2 Participating Agencies

According to SAFETEA-LU Section 6002, a participating agency is a federal, state, tribal, regional, or local government agency with interest in the project. By definition, all cooperating agencies are participating agencies, but not all participating agencies are cooperating agencies. Invitation letters soliciting participating agency participation are included in Appendix D. Twenty-eight federal, state, and county agencies, communities, and other interested parties are considered participating agencies. The agencies and their

responsibilities are listed in Table 3-3 in the SIP. The responsibilities listed are in addition to providing comments on purpose and need, study methodologies, range of alternatives, environmental impact analyses, and the preferred alternative.

5.1.3 Agencies Declining Invitation to Participate

Pursuant to SAFETEA-LU Section 6002, a federal agency that declines to be a participating agency must specifically state the following in its response:

- It has no jurisdiction or authority with respect to the project.
- It has no expertise or information relevant to the project.
- It does not intend to submit comments on the project.

A nonfederal agency must formally accept the invitation in order to be considered a participating agency. If an agency declines, its response should state the reason for doing so. If it chooses not to participate, the agency may still comment on the process at public/stakeholder involvement venues (coordination planning group, task forces, public meetings, etc.). A nonfederal agency that does not respond to the invitation will not be considered a participating agency. In this project, 62 agencies were requested to be participating agencies, 23 of which accepted. Eight agencies declined, and 31 that did not respond are considered to have declined. Those agencies are listed in Table 5-2.

TABLE 5-2
Agencies that Declined Participating Agency Status or Did Not Respond to the Invitation

IDOA	Cook County	City of Wood Dale
IEPA	Kane-DuPage Soil & Water Conservation District	Village of Bensenville
Illinois NRCS	North Cook County Soil & Water Conservation District	Village of Berkeley
ISTHA	Addison Township	Village of Bloomingdale
Hannahville Indian Community	Elk Grove Township	Village of Franklin Park
Ho-Chunk Nation of Wisconsin	Hanover Township	Village of Melrose Park
Peoria Tribe of Indians of Oklahoma	Leyden Township	Village of Norridge
Pokagon Band of Potawatomi Indians	Maine Township	Village of Roselle
Prairie Band of Potawatomi	Norwood Park Township	Village of Rosemont
Sac and Fox Nation of Missouri	Proviso Township	Village of Schiller Park
Sac and Fox Tribe of the Mississippi in Iowa	Schaumburg Township	Village of Villa Park
Winnebago Tribe of Nebraska	York Township	RTA
City of Park Ridge	CTA	

During the study process, cooperating and participating agencies participated at several venues, such as project working group meetings, the NEPA/Section 404 concurrence

process (for federal/resource agencies), one-on-one meetings, small group gatherings, and stakeholder workshops.

5.2 Federal, State, and Local Agency Coordination

From the beginning of the study, two groups were established to provide a forum for discussing the project and for engaging various federal, state and local agencies. One consisted of regular NEPA/404 Merger agency meetings to discuss the transportation issues in the study area, the purpose and need for the improvements, the methodology for developing and screening alternatives, methods for evaluating environmental impacts, and the rationale for dismissing alternatives. These discussions were accomplished in individual meetings, as well as the formal NEPA/404 concurrence meetings. The other group (meetings of the Project Management Team, consisting of IDOT and FHWA representatives and their consultants) comprised the study leadership and focus on the overall technical and process aspects of the project, ensuring that the planning requirements of IDOT and the Federal Government are satisfied.

5.2.1 NEPA / 404 Merger Process

The project was coordinated under the Statewide Implementation Agreement for Concurrent NEPA/404 Process, which was designed to ensure appropriate consideration of the concerns of the USACE, the USEPA, the USFWS, and others as early as practicable in the highway project development process. It is intended to involve these agencies at key decision points in project development to ensure environmental clearances for the project are secured. Project team members attended regularly scheduled meetings held by regulatory/resource agencies to discuss the project. The NEPA/404 process seeks to obtain concurrence from the signatory agencies at three key decision points: Project Purpose and Need, Alternatives to be Carried Forward, and Preferred Alternative.

5.2.1.1 Scoping Meeting

Early in the process, an Agency Scoping Meeting was held (December 12, 2007) with the regulatory and resources agencies to identify the important environmental issues and concerns to be considered in the EIS (see Appendix I for meeting minutes). The meeting included an overview of the process, a description of the Tiered EIS process, and a review of the analytical tools. The GIS was a specific focus, and details were presented concerning data layers, sources of data, level of detail and gaps in the data. The agencies agreed that the level of detail in the GIS database was appropriate for comparing impacts of alternatives and for making decisions about transportation system solutions.

The principal purpose of the meeting was to solicit the agencies' input on key resource issues and topics to be addressed in the EIS. Topics that were suggested included the need to avoid and minimize impacts to environmental and socioeconomic resources, consideration of sustainable design measures, multimodal transportation solutions, and the need to ensure the project is compatible with concurrent transportation improvement projects. (See the Scoping Document in Appendix I for a detailed description of the issues the agencies discussed.)