



MEMORANDUM

To: Joint LPA Committee

From: John Evans, LTD
Cosette Rees, LTD

Date: January 4, 2011

Re: Summary of Public Comments Received and Responses: November 22, 2010 – January 4, 2010

The following is a summary of comments received about the Alternatives Analysis, between November 22, 2010, and January 4, 2011. To date, LTD has received 35 separate communications (individual letters, emails or comment forms), regardless of the sender. For example, if an individual sent several letters or emails citing the same or similar concerns, each individual communication is tallied as 1 communication.

The comments in each communication have been organized and tabulated by topic area; a communication could have more than one comment and could address more than one topic area. Noted below each topic area is the number of comments received about the topic, a summary of the key issues expressed, and LTD's summary response to the comments, including how this feedback or similar feedback has affected the project. Please refer to the individual comments in the meeting packet for detailed comments and responses.

LTD has received 48 comments addressing 9 topic areas:

Comment Topic Area	# Comments
Communication between Joint Corridor / Steering Committee and Joint LPA Committee	1
Conflicts and Errors in Data, Analysis, Reports and Presentations	7
Viability of TSM Alternative	1
Project Funding	1
Supports EmX	7
Opposed to EmX	4
Project Process and Impacts	14
Operating Costs, Ridership and Boardings	10
LTD Advertising/communications	3
Total	48

Communication between Joint Corridor /Steering Committee and Joint LPA Committee

- 1 comment
 - Request to forward LTD's response to EmX committee members and interested parties.
- *LTD Response*
 - Request accomplished.

Conflicts and Errors in Data, Analysis, Reports and Presentations

- 7 comments
 - Errors in presentation of data
 - Summary report uses language not allowed in formal report
 - Cannot compare Franklin/WEEE ridership and costs because there is no major destination.
 - Questions number of stops per hour used for West 11th.
 - Cost difference between current service and first year of operation – told \$1 million, then adjusted.
 - Accepted invitation to meet regarding “magic numbers.”
 - Mitigation discussions are not documented, which can lead to miscommunications and misconstrued information.
- *LTD Response*
 - LTD appreciates the questions allowing further clarification.

Viability of TSM Alternative

- 1 comment
 - Community believes TSM is a viable option but LTD says it's included only because it's required by FTA – is it a viable option?
- *LTD Response*
 - The TSM option would likely not receive federal funding, which would require funding to come from local sources.

Project Funding

- 1 comment
 - Concerns about funding in future
 - Competing with Oregon Rail and earmarks going away
- *LTD Response*
 - Thank you for your input.

Supports EmX

- 7 comments
 - Weighting of criteria further supports W 13th W 11th Ave Alternative and puts even less value on No Build and TSM Alternatives
 - Citizen unable to attend public participation sessions worried that complaints by vocal few give impression that majority of residents oppose project.
 - Strongly and enthusiastically support project.
 - From urban planning perspective West 11th has been problem and embarrassment.
 - It could be so much better with BRT and better-functioning multiway boulevards!
 - Sorry that some citizens not able to see cost/benefit balance more accurately, and resulting value to residents.
 - Urge you to forge ahead!
 - I don't understand objection by businesses to EmX
 - I don't drive past any affected businesses on 11th because I intentionally use Roosevelt or 18th to avoid traffic congestion and headaches
 - EmX can only improve W 11th by fixing congestion, and providing easier way to get out to West Eugene
 - Businesses in area should want West 11th to look more appealing like Franklin Corridor instead of industrial zone West 11th used to be
 - This is our opportunity to use federal funds to improve this stretch of road, improve traffic flow, and make it more accessible to consumers
 - Business opposing EmX doesn't make much sense to me-by defending the status quo, they're asking me to spend my dollars elsewhere
 - West Eugene EmX --- I SUPPORT IT, especially since the majority of the funding is from federal sources.
 - Efficient and effective transit is a privilege for some and a necessity for others. The EmX system is not only a necessity for me but the Envy of many medium sized cities.
 - Relocated to the community to work downtown Springfield.
 - Rides EmX everyday to downtown Springfield.
 - Downtown Springfield is seeing positive effects of EmX.
 - Imagines success EmX will bring to businesses along West 11th.
 - This kind of transit expansion is cost effective and vital for growth in communities like ours.
 - I highly support efforts to reduce business impacts along West 11th through mitigation. I hope West Eugene EmX is successful!
 - I support the current EmX project for the west side. I embrace LTD's growth for Lane County.
 - Ex-Eugenian who supports economic growth and intensification
 - Important to support tax base and LTD's financial fiscal health.
 - Just Do It!
- *LTD Response*
 - LTD appreciates your feedback on the proposed project.

Opposed to EmX

- 4 comments
 - Opposed to project because costs outweigh return on investment. EmX caters to very small percentage of citizens and it doesn't meet their needs.
 - No more EmX!
 - Local business man who has travelled around the world frequently, shocked to see the stupidity of local transit system and bus situation in this town.
 - Never seen any of these large buses used elsewhere. Common sense says the large buses are hard to maneuver. Should use smaller buses and increase frequency during prime times.
 - Will need to spend another \$100 million in lawsuits for destroying businesses and properties on top of purchase price. Local businesses who don't benefit from them will bear the burden of the fortune to operate the service.
 - Buses are mostly empty, except mornings and evenings. Sees few people waiting at bus stops.
 - Construction will cause local businesses to go bankrupt or out of business as they are already struggling.
 - Willing to contribute financially to lawsuit to stop EmX waste.
 - Should have been voted on by the people.
 - Bad experience with city construction on Bailey Hill, devastating businesses.
 - Construction of EmX Springfield Depot killed my commercial medical building, which is now empty due to loss of parking.
 - I do not support the proposed EmX
 - Money should be spent on infrastructure and schools
 - EmX cuts out too many stops
 - Construction would be disastrous for West 11th merchants.
 - Would aggravate auto traffic, not help it.
 - Low density does not support project.
 - Huge amount of money with little improvement.
 - Look into TSM alternative.
- *LTD Response*
 - LTD appreciates your feedback on the proposed project.

Project Process and Impacts

- 14 comments
 - What happens if all property owners fight project and wait for condemnation?
 - What if there is more "total loss" than anticipated?
 - Public comment period is still confusing me
 - Who made decision to not release the AA Technical Report until January?
 - Is there a 60-day comment period for the Alternatives Analysis Report?
 - Question: date of public hearing? Is there a required 60 day comment period after a vote? When is the vote? When does the application for funding need to be completed?

How do federal and state funding applications/allocations correlate? Is biennium state or federal?

- Best alternative for Wyatt's is to not utilize West 11th but rather 7th Street alternative
 - Believe construction of BAT will create unsafe operational conflicts between higher speed BAT vehicles and slower speed commercial and personal vehicles
 - Provides range of suggested mitigation
- Corridor Committee did not reach closure because there was no discussion explaining values assigned by Committee members
 - Community needs to build system for now and future
 - To be viable, route needs to be located where transit ridership and revenue have best chance of growing over next 20-30 years – which means locating EmX along mixed use nodes
 - Rated environmental impacts low relative to other human needs because can be mitigated
- Concerned about EmX line further limiting accessibility to business site which had their access on 7th cut off when ODOT redesigned intersection (7th/Garfield); would like to not lose any parking.
- Friend has asked questions about EmX operating costs but LTD has been delaying this information. How can LTD justify \$100 million when the questions have not been studied?
- Follow up questions to Westmoreland presentation ... request confirm providing factual reference that no buildings will be demolished on West 11th Avenue.
- Second request for factual reference regarding no buildings being demolished on West 11th Avenue.
 - Summary report is too subjective
 - If impacted parking lot does not meet fire code, will that property owner be able to obtain fire insurance?
- Why do you have public meetings? It is apparent you have already made up your mind.
 - LTD is not responsible to the voters.
- Concerned about west-side plans – looks as if form has greater allure than function; appears that EmX is imposing a solution to a problem that the public does not have.
- *LTD Response*
 - Comment period:
 - No 60-day public comment period required at this stage
 - Required public comment is linked to environmental document (EA or EIS) -has required public comment period
 - Plenty of public comment leading up to selection of LPA
 - Various committees, open houses, and public hearings
 - Following LPA selection comments continue to be taken
 - Dialogue about Build (selected LPA) vs. No-Build continues through completion of environmental document
 - Then community selects Build or No-Build option prior to application for funding
 - Alternatives Analysis Technical Reports are in the hands of FTA staff and when they complete their review they will return the documents to LTD. We will release the documents as soon as we receive them.
 - The public hearing schedules need to be coordinated with the other decision-making bodies. We have tentatively scheduled a joint Public Hearing on February 9.

- The District is working toward the August deadline for Small Starts grant funding applications. The state funding (lottery bonds used for the local match) discussions occur during the legislative session this winter and spring. That process is complete prior to the federal funding application due date. Biennium is a state term. Federal funding cycles are annual. The state funding would occur over several biennia since the money isn't needed all at once.
- If parking elimination creates a situation that it no longer meets code, it is likely the entire lot would need to be acquired. Through mitigation, LTD has found ways to avoid nearly all such impacts.
- LTD's Board of Directors is appointed by the Governor, who is elected by the residents of this state.

Operating Costs, Ridership, and Boardings

- 10 comments
 - Concerns about triple weighting "Operating Costs". Consider only using one of these.
 - How can you compare Franklin Corridor ridership with West 11th Corridor ridership when there is no major destination like the University?
 - Do you mean that West 11th Corridor feeder routes will not be provided until the Hwy 99 and River Road Corridors are built (in another 20 years)? The Franklin Corridor IGA called for feeder routes – where are they?
 - Riding the River Road Loop takes one hour – why?
 - Is there a cost analysis for just reassigning a lane for 6th / 7th? If you just reassign a lane, then there is no acquisition except at bus stops.
 - Where do ridership numbers come from?
 - Why can't you just transfer from one EmX Corridor to another at 6th / Chambers for River Road and at 6th / Garfield for Hwy 99? Why does it have to be a continuous loop?
 - What would be immediate change in cost as soon as West Eugene EmX took over? It looks like annual operating costs are about \$1 million more than No-Build. How is it same in 2015 as in 2031? I thought delta in operating costs was supposed to decrease over time, due to efficiency of EmX vs. regular bus service. What is initial difference in operating costs between existing regular bus service and West Eugene EmX in 2015?
 - 41/43 each run twice an hour on opposite sides of the street. You are getting an additional twice an hour service from route 76, that only goes to Oak patch? You are calling that twice an hour service for W 11th? Does 76 even make it to Seneca Station? Now I really want to see the details behind the summary numbers. Do you have an update on when these will be out?
 - What is the approximate cost of the "1000" series articulated buses, such as used on the #11 Thurston route, and how many people does it accommodate? Same question for the EmX "Green Dragon" series?

- *LTD Response*

Operating cost was used in several different calculations as a measure for evaluating the effectiveness of project alternatives. These measures were developed from the eight criteria developed with project committees, the public and public agencies as a means of determining the best transit solution for the West 11th Avenue Corridor.

Cost per trip is one measure of effectiveness (MOE) considered under Criterion #2 (Improve Operating and Other Efficiencies). Cost per trip is a common measure of the operating efficiency of a transit system. This MOE calculates the cost per trip by dividing the operating cost by ridership projections. Both MOEs for Criterion #6 (Fiscally Stable Transit System) use calculations based on operating cost. The qualitative MOE for effect on fiscal stability considers the effects of systemwide operating cost per trip by alternative. The quantitative MOE for operating cost reflects the FTA's cost-effectiveness threshold measure (called a Transportation System User Benefit [TSUB]) and is based on operating cost, capital costs, and projected ridership.

These criteria reflect the issues of great importance to the community, which include cost effectiveness, fiscal stability, and system operating costs.

41/43 each run twice an hour and function as one route. The replaced service hours for the 41/43 will be the segment from Eugene Station to Commerce Street.

Route 76 runs as far as Oak Patch on the west, and also runs to the UO on the east. Since the entire corridor segment would be deleted, we will account for hours along the corridor only. The service hours that operate south of West 11th Avenue would be retained and make up a connector route for the areas currently served by this route.

See full packet for detailed comments and responses.

LTD Advertising and Communications

- 3 comments
 - It is inappropriate for the government to be lobbying for its own desires, using community resources, when many in this community oppose it and it is a known contentious issue. Government informs, it does not lobby against the people using their money. Continues to cite examples of LTD's use of money to lobby for EmX.
 - I understand advertising new routes and closures, and other issues pertinent to service and transportation. It is my opinion that the billboards, radio ads and newspaper ads that are "political" in nature violate the proper use of LTD's advertising and communications budget. Requested name of attorney to verify.
 - Questions regarding advertisements:
 - How does LTD conclude the community supports West Eugene EmX?
 - How much has LTD spent for advertising in support of West Eugene EmX, and what amount is budgeted?
 - What is the statutory authority for LTD spending funds on such advertising?
- LTD Response
 - Attorney is John Arnold of Arnold Gallager, 541-484-0188. Ads provide the community information about the project and attempts to engage them by providing a call to action. LTD is charged with implementing a program that is adopted in the community's transportation plan and until that changes it is LTD's role to explain the benefits. LTD has budgeted \$70,000 for media placement over a five-month period, however we do not expect to spend the total allocation.

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- ORS 267 provides support for the expenditure of funds to perform the business of the district. Over the years, LTD has allocated funding for communications, outreach, education and advocacy. LTD is informing and educating the community regarding the development of EmX. We feel people will be better educated and can articulate their support or non-support based on the data.

In addition to the comments noted above, some of the communications included comments unrelated to the project. These comments have been forwarded to the appropriate staff.