

Memo

To: MPC Citizen Advisory Committee

From: John Evans, LTD
Cosette Rees, LTD

Date: November 24, 2010

Re: Comment Response and Project Effects

Since the WEEE project's initiation, LTD has conducted an extensive public and agency outreach program. This memo is a summary of how comments and feedback have been incorporated into the project development process.

LTD maintains a comment database for the project, which includes the date the comment was received, if the comment was received in association with an outreach event, the source of the comment (e.g., letter, email, comment form, etc.), the name of the individual submitting the comment, any affiliated organization (if provided), the comment, the response or project effect, and categories the comment is associated with (e.g., process, alternatives, air quality, neighborhoods, traffic, etc.). This database allows LTD to efficiently organize and respond to public and agency comments.

At project milestones, LTD has prepared and published reports documenting the project development process and public and agency input. The following is a summary of the public input received, the effect on the project, and the documenting reports. Summaries and responses to recent comments on the Alternatives Analysis are provided below following an overview of the project's public involvement process. All original comments received by LTD since the release of the Alternatives Analysis Report are included separately as part of the Joint LPA Committee December 2, 2010 meeting materials packet.

Scoping and Project Purpose and Need

A Notice of Intent (NOI) for the WEEE project was published in the *Federal Register* on September 18, 2007. The NOI stated that FTA and LTD intend to prepare an Environmental Impact Statement (EIS) for the WEEE project, provided information regarding upcoming scoping meetings, and invited interested parties to participate in the project's environmental review process. Anyone wishing to comment on the project was requested to submit comments by November 2, 2007; during the scoping period, the date for submitting comments was extended to November 6, 2007. In addition to the NOI, display ads were placed in local newspapers and media releases were issued to print, radio, and television media. Spanish-language notices were also provided.

FTA and LTD invited 33 agencies and tribes to attend an informational meeting and field tour on September 27, 2007. Eight agency representatives attended the meeting and provided comment on the project. No tribal representatives attended the meeting.

On October 8 and 9, 2007, public scoping meetings were held in two different locations in the project study area. Over the two-day period, 112 people attended the scoping meetings and provided comment on the project.

During the scoping period, LTD held meetings with the West Eugene EmX Corridor Committee (a project advisory committee), LTD's EmX Steering Committee, and LTD's Board of Directors. LTD staff also met with and made presentations to other organizations (such as the City of

Eugene and the Eugene Bicycle Coalition), committees (such as the West Eugene Collaborative), and neighborhood associations (such as Churchill, Far West, Jefferson-Westside, Whiteaker, and River Road).

Throughout the scoping period, LTD implemented outreach strategies to encourage participation by communities that are typically under-represented in transportation development processes. Examples of outreach include: flyers on buses, meetings at local sites, opportunities for Spanish-language translation, and notices in the *Register-Guard* newspaper. Relevant information was translated into Spanish and posted on the LTD website early in the process. A postcard and mailer was sent to every address within ½ mile of West 11th Avenue. Mailed materials and other materials distributed on the buses and in community event displays, such as Fiesta Latina, LTD included Spanish text offering to provide translated materials, or access to a Spanish-speaking representative to provide information and take comments. For all of the meetings held during the scoping period, LTD had translators available and offered to provide materials in alternative formats. LTD also made the materials available and provided a presentation to organizations such as OASIS, whose membership includes more than 8,500 local seniors.

After reviewing public and agency comments as well as the range of alternatives suggested for further study in the project's Draft Environmental Impact Statement (DEIS), FTA and LTD invited 29 agencies to participate in the project as participating or cooperating agencies. Additionally, LTD determined, based on the extent of public comment, that the scoping decision regarding the project's final Purpose and Need statement and Goal and Objectives would be separated from the scoping decision regarding the range of alternatives to study further and the scope of the EIS.

Comments regarding the project's Purpose and Need Statement and Goal and Objectives, including responses to the comment summaries and any resulting recommended changes, are documented in the *Draft Scoping Report, West Eugene EmX Extension, Purpose and Need Statement and Goal and Objectives* (December 2007).

During the scoping period (September 18 through November 6, 2007), LTD received 396 comments on the project's proposed Purpose and Need statement and Goal and Objectives. Comments ranged from requests for clarification to concerns about the outcomes related to specific project objectives. Comments and suggested changes in response to comments were presented to both the WEEE project Corridor Committee and LTD's EmX Steering Committee. Advice and recommendations from the committees were forwarded to the LTD Board of Directors, who adopted the revised Purpose and Need Statement and Goal and Objectives in March 2008.

Scoping and Project Range of Alternatives and EIS Scope

At the outset of the scoping process, LTD proposed one mode alternative and several alignment alternatives for consideration by the public and agencies. Mode alternatives proposed by LTD for study in the Draft EIS were fixed route bus service (No-Build), a low-cost capital improvement bus service (TSM), and BRT service. Alignment alternatives proposed by LTD for study in the Draft EIS were organized by corridor segment:

- Segment A – Eugene Station to Garfield Street
 - 13th Avenue
 - 6th / 7th Avenues
- Segment B – Garfield Street to Beltline Road
 - Amazon Channel

- 11th Avenue
- Segment C – West Beltline Segment
 - 11th Avenue to Terry Street Loop

During the scoping period, after reviewing LTD's proposed mode and alignment alternatives, the public proposed more than 20 mode and alignment alternatives; no alternatives were proposed by public agencies or jurisdictions. Mode alternatives proposed by the public were electric (trolley) bus, streetcar, light rail, and grade-separated transit. Alignment alternatives proposed by the public for study in the Draft EIS were:

- Segment A – Eugene Station to Garfield Street
 - Amazon Channel
 - 11th Avenue
 - West 18th Avenue
- Segment B – Garfield Street to Beltline Road
 - 7th Place / Stewart Road
 - 10th Avenue / 11th Avenue
 - Amazon Channel (different from the alignment alternative proposed by LTD)
 - 18th Avenue
 - Highway 99 / Roosevelt
 - 1st Avenue / Roosevelt
- Segment C – West Beltline Segment
 - 11th Avenue to City of Veneta
 - 18th Avenue
 - Roosevelt / Danebo
 - Roosevelt / Royal

In addition to the alternatives outlined above, the public proposed three other alignments that were determined to not fall within any of the corridor segments: Highway 126 to Florence, Highway 99 to Barger Drive and Junction City, and River Road to north of Beltline Highway.

LTD conducted a multi-tiered screening level analysis (based on the project's revised Purpose and Need and Goal and Objectives) of all of the proposed mode and alignment alternatives within the corridor. Based on the recommendations of the screening analysis, the LTD Board adopted the following mode and alignment alternatives for further study in the Draft EIS, which included alternatives recommended by the public:

- Selected Mode Alternatives
 - Fixed route bus service (No-Build, required under NEPA)
 - Transportation systems management (TSM) bus improvements
 - Bus rapid transit (BRT)
- Selected Alignment Alternatives (by Segment)
 - *Segment A – Eugene Station to Garfield Street*
 - 13th Avenue
 - 6th/7th Avenues
 - *Segment B – Garfield Street to Beltline*
 - 7th Place/Stewart Road
 - Amazon Channel
 - 11th Avenue
 - *Segment C – West of Beltline Segment*
 - 11th Avenue to Terry Street Loop

The process to determine the range of alternatives for further study and the scope of the EIS, including public and agency input, are described in the following documents:

- *Draft West Eugene EmX Extension Project Scoping Screening of Alternatives Findings Report* (February 2008)
- *Draft West Eugene EmX Extension Project Scoping Screening of Alternatives Findings Report Executive Summary* (February 2008)
- *Draft Final West Eugene EmX Extension Project Alternatives Analysis / Draft Environmental Impact Statement Range of Alternatives Report* (February 2008)

Design Refinement and Community Dialogue Workshops

During summer 2008, after preparing the sketch-level designs for the alternatives, LTD conducted a series of Community Design Workshops, to dialog with residents and businesses at a deeper level about the sketch-level designs. Media releases were sent to 52 local media organizations, public agencies, and other potentially interested parties. Advertisements announcing the workshops and soliciting participation were published in the Register-Guard. Media releases aimed at encouraging participation by the Spanish-speaking community were sent to two media organizations representing Spanish radio stations and newspapers. Two project newsletters were published announcing the Community Design Workshops, one in May 2008 and another in July 2008. Announcements about the Community Design Workshops were also posted on the project website.

Over 140 people participated in the Community Design Workshop series, helping LTD explore opportunities and concerns about the alternatives and design options and develop possible solutions. Throughout the Workshop series, over 650 comments were received and reviewed by the project team. Comments were collected verbally in the small group workshops, participants could write their comment on the maps provided, comment forms were provided at the workshops, and people could e-mail, telephone, or use the US postal service to share their input.

Comments from the Community Design Workshops include:

- Impacts to adjacent properties
- Pedestrian and bicyclist safety
- Conflicts between EmX buses and vehicles
- EmX benefiting neighborhoods and increasing transit ridership
- Consistency of EmX with City's long range plans for mixed-use, higher density development
- Opportunities for EmX to encourage economic development and improve streetscapes

In addition to the Community Design Workshops, LTD held project committee meetings, hosted information booths at public events and, through the project Speakers Bureau, made presentations to neighborhoods, civic groups and professional organizations. Each event helped LTD explore opportunities and concerns about the alternatives and design options and develop possible solutions.

During summer and fall 2008, LTD met with local, state, and federal agencies to review the project alternatives and design options, sketch-level designs, public input, and the results of on-going data collection and evaluations. In September 2008, LTD held a workshop and field tour for agencies who have accepted a Participating Agency role on the project. As with the Community Design Workshops, LTD used the workshop with Participating Agencies to explore opportunities and concerns about the alternatives and design options and develop possible solutions, as well as to discuss regulatory issues.

LTD used the feedback from the Community Design Workshops and other public input, along with existing conditions data, transit operations data, and feedback from consulting with other agencies, to modify the sketch-level designs. The modified designs were translated into preliminary engineering drawings for the detailed evaluation of alternatives, the Alternatives Analysis (AA).

In October 2008, LTD held a Report Back Open House to share with the community the range of comments and feedback received and how their input was incorporated into the design refinement. LTD spoke with 54 participants at the Report Back Open House.

The existing conditions data, public and agency input on possibilities and concerns, and other factors considered in refining the project alternatives is documented in the *West Eugene EmX Extension Project Environmental Impact Statement Community Report Back on Design Refinement Process* (November 2008).

Engineering Refinement

Throughout 2009, the LTD project team met with individual property owners, neighborhood organizations, and agencies to avoid or reduce potential impacts by refining the engineering designs. The input into the engineering refinement process and documentation of the resulting changes are maintained by the design team. The engineers document the issues they are resolving with the design changes, refine the engineering, and determine if the adjustments resulted in any unanticipated impacts that must be analyzed and/or require additional design modifications. The succession of requested design modifications and engineering change sets are in an electronic format. Over the past 1 ½ years, the project development team has refined the engineering design numerous times to avoid and reduce potential impacts.

Alternatives Analysis

After spending more than one year refining the alternatives' designs, in January 2010, LTD began evaluating the project's alternatives. The preliminary findings from the impact analysis revealed potential significant adverse impacts for some of the alternatives and design options and reviewed these findings with FTA and other agencies. In June 2010, the LTD Board eliminated from further consideration one alignment alternative (Amazon Alignment) and a large number of BRT routing combinations because of the potential significant adverse impacts revealed in the impact analysis. During summer and fall 2010, LTD draft the Alternatives Analysis Report summarizing the findings of the impact analyses and the evaluation of alternatives based on the project's Purpose and Need Statement.

The Alternatives Analysis Report was published in October 2010 and was made available for free to the public through the LTD web site and at public libraries and agencies; hard copies could be purchased directly from LTD. With the publication of the report, LTD has held project committee meetings and open houses to review the report, answer questions and collect feedback.

The following is a summary of comments received about the Alternatives Analysis, between October 25 and November 22, 2010. To date, LTD has received 26 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 a separate 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 response to the comments, including how this feedback or similar feedback has affected the project. LTD has received 49 comments addressing 10 topic areas:

Comment Topic Area	# Comments
Project Opponents Providing Misinformation	1
Request to Extend Schedule for Selecting an LPA	1
Supports No-Build Alternative	10
Supports EmX Extension	9
Alternatives Analysis Report is Flawed	9
Mitigation Measures / Design Changes	5
Service Changes	4
Project Development Process	7
Eminent Domain	1
WEEE Project	2
Total	49

Project Opponents Providing Misinformation

- 1 comment
 - Project opponents are providing misinformation to the community regarding the amount of funding that the federal government will provide.
- *LTD Response*

Thank you for bringing this to our attention. Throughout the project development process, LTD has conducted an extensive outreach process to include the community in the decision about how to extend EmX into the West Eugene Corridor. Written project information has been provided through our website, newsletters and meeting handouts. We appreciate when a community member brings to our attention information missing from our communications or issues requiring clarification, so that we can provide additional information and continue the West Eugene EmX dialogue.

Request to Extend Schedule for Selecting an LPA

- 1 comment
 - Believe that the Alternatives Analysis Report needs clarification and / or revisions based on concerns from their review including:
 - Substantive issues need to be addressed;
 - Public and decision-makers are not able to understand the important issues for selecting an LPA without restructuring the document;
 - Additional time is needed to thoroughly review the AA Report and revise it; and
 - Compressed timeline for the public and City Council to consider the WEEE LPA selection and the “Envision Eugene” issues.
- *LTD Response*

LTD's technical team used a multi-criteria decision analysis, a standard transportation decision-making tool. This approach is useful when determining how a range of alternatives best meet policy objectives that cannot be easily quantified or expressed in a common metric. LTD does not believe that the AA Report has failed to address substantive issues or requires restructuring to better understand the important issues in selecting an LPA.

The AA Report was published on October 25, 2010 and it is one component in an

extensive process to reach a decision about the best transit investment in the West 11th Avenue Corridor. In addition to the AA Report, LTD is conducting open houses, project committee meetings, and one-on-one meetings with property owners and businesses. The Joint LPA Committee will consider the AA Report, the feedback from community outreach, and proposed mitigation measures resulting from meetings with potentially affected property owners and businesses prior to determining a preliminary LPA, anticipated in January 2011. Public meetings will be held to review and discuss the preliminary LPA and for the community to provide comments about the preliminary LPA directly to decision-makers. After public review and comment, the Joint LPA Committee will determine the LPA to be advanced for further study, anticipated in February 2011.

The advanced LPA will undergo additional evaluation and public review prior to the Eugene City Council, MPC and LTD Board determining the transit investments for the West 11th Avenue Corridor, anticipated in summer or fall 2011. LTD believes that the extensive 10- to 11-month process to determine transit investments in the Corridor provides ample opportunities for the community to review project information, discuss issues and concerns, and provide feedback to decision-makers.

Supports No-Build Alternative

- 10 comments
 - Supports selecting the No-Build Alternative based on:
 - West 11th Avenue needs more traffic capacity not buses;
 - Adversely affecting businesses is wrong;
 - Taking vehicle capacity from taxpayers is wrong;
 - Mass transit serves a limited segment of the population;
 - LTD does not benefit most of the businesses within its taxing district;
 - Ridership percentages on buses are low;
 - EmX in this corridor will not improve service over regular bus service;
 - LTD should honor the decision of people who live and/or work on West 11th and 13th Avenues who do not want EmX there (commenter notes that if EmX must be built, then it should be located on 6th / 7th Avenues);
 - Franklin Corridor success is due to elimination of stops and LTD should employ this less expensive fix to bus routes on West 11th Avenue; and
 - LTD should not be spending taxpayer dollars (regardless of their source) on a questionable project or a project not wanted by the community.
- *LTD Response*

Since 2007, when the first Corridor opened, EmX has had nearly 6 million passenger boardings. In September 2010, EmX experienced its busiest week ever, a milestone set well after the special free-fare phase ended in January 2010. EmX transports more riders in less time than any bus route in the system. A primary goal of EmX is to control operating costs by implementing a system that is more efficient than standard bus service. LTD's regular route buses face increased delays due to congestion from increasing traffic volumes, which increases operating costs over time. EmX is generally unaffected by the increasing congestion, resulting in a more efficient transit system.

The Eugene City Council and the LTD Board selected the West 11th Avenue Corridor for the next EmX phase because the increasing traffic congestion in the

Corridor was resulting in increased safety issues for motorists, pedestrians and bicyclists; costs to operate standard bus service; greenhouse gas emissions; and delays to freight delivery, commuters, and transit users. EmX takes regular buses off the street and out of the way, improving vehicle and freight mobility and roadway capacity. Portions of West 11th Avenue are a federally designated truck route and a state freight route, used by businesses in the Corridor as well as by businesses that are located outside the Corridor. Improving vehicle and freight mobility and roadway capacity is good for businesses affected by traffic in the Corridor.

With each additional corridor of service, the EmX system becomes more valuable to riders and motorists alike. As EmX grows, more people will ride and more cars will be left at home. Fewer cars on the street means reduced congestion and greenhouse gas emissions.

Supports EmX Extension

- 9 comments
 - Supports extending EmX based on:
 - Arguments against EmX are similar to arguments heard when 6th and 7th streets were expanded;
 - This is planning for the future;
 - EmX along 13th and 11th Avenue, as designed, works best - serving the fairgrounds is important;
 - EmX along 13th and 11th Avenue works best – reserve 6th / 7th to serve the Highway 99 and/or Chambers-River Road EmX Corridors.
 - Vital component of our transportation system.
 - EmX is part of a future where energy is used more wisely and communities are more compact and livable.
 - West 13th Avenue Alternative is more direct and least impactful.
 - BAT lanes are an interesting solution to business access.
 - Get on with it – West 13th / 11th Alternative is least disruptive, 6th / 7th has too many issues.
- *LTD Response*

LTD appreciates your feedback on the proposed project.

Alternatives Analysis Report Flawed

- 9 comments
 - Believes alternatives analysis methods and conclusions are flawed and report requires revisions or an addendum based on:
 - The technical team improperly used an ordinal scale to evaluate the alternatives;
 - There is no supporting evidence that the Measures of Effectiveness (MOE) are of equal importance;
 - There is no basis for treating the 12 environmental factors as one MOE;
 - There is no explanation for how the MOEs were assigned ratings;
 - Assigned ratings are not consistent between MOEs;
 - Summing the ordinal numbers imposes specific rankings that pre-empts the community process in selecting an LPA;
 - The ranking of alternatives should be based on the community's determination of the importance of the criteria and the differences between alternatives;

- The ratings scale should have been on a more familiar ABCDE scale instead of a 12345 scale; and,
 - There is no thoughtful, clear or compelling discussion of the differences between alternatives and the recommended alternative.
- *LTD Response*

The multi-criteria decision analysis used by the technical team is a standard transportation decision-making tool and was used to provide a relative comparison of the alternatives from a technical perspective. This approach is useful when meeting policy objectives cannot be easily quantified or expressed in a common metric. Using detailed analysis and expert judgment, each of our project's subject matter experts were asked to give a score on how well each criterion is met under a particular alternative or option. This type of matrix-based process is also known by other names (such as grid analysis, decision matrix analysis, Pugh matrix analysis) and is commonly used in transportation decision-making for comparing alternatives against a variety of criteria with a mix of supporting qualitative and quantitative data, allowing for a reasonable comparison of "apples and oranges".

There are a number of decision making tools available - and they all have pros and cons (including the one we used). However, LTD does not believe that the approach or method used in comparing the alternatives is flawed and requires revisions, modifications or addendums. The decision matrix analysis presents the technical team's perspective without assigning any relative importance to the criteria. The LPA selection process places the assignment of relative values of importance with the Joint LPA Committee with input from the community. LTD has developed and distributed comment forms to collect rating and weighting information; any received information will be provided to the Joint LPA Committee. Additionally, community members may choose to conduct their own decision analysis based on the data provided in the AA Report and summarize their conclusions in a different manner, which would provide the Joint LPA Committee another perspective.

In Chapter 9 of the AA Report, for every MOE, there is a summary of the data considered, a relative rating table and a listing of findings that contributed to the subject matter expert's conclusions.

Mitigation Measures / Design Changes

- 5 comments
 - Change location of bridge crossing Amazon Creek at Buck Street to location nearer to Berkeley City Park.
 - Consider a bridge near Target enhancing EmX as a commuter solution on west side of Eugene.
 - Mitigation needs to occur at Fairgrounds without changing the character of the neighborhood – consider softer design treatments consistent with community character.
 - Consider potential neighborhood cut-through traffic resulting from 13th/Fairgrounds traffic signal.
 - Avoid the Amazon Canal or include sufficient mitigation.
- *LTD Response*

Thank you for your suggested mitigation measures. LTD will take each of your suggestions to the design and technical team for review.

In June 2010, based on the impact analysis findings, the LTD Board eliminated the Amazon Alignment Alternative from further study.

Service Changes

- 4 comments
 - Concerned that EmX will reduce regular bus service and, because EmX makes fewer stops, seniors and disabled persons will have reduced and more difficult access to transit.
 - Concerned that the EmX vision is to completely replace regular bus service.
 - It is misleading to include bus route #30 in the TSM Alternative when the route was eliminated in September 2010.
 - Implementing EmX will increase operating costs and result in additional service cuts.

- *LTD Response*

EmX envisions 61 miles of bus rapid transit service, which will replace some standard bus routes; it is not LTD's vision or intent to replace all regular bus service.

LTD has budgeted for the increased operational cost of implementing EmX in West Eugene. LTD already has a substantial amount of service along the corridor, becoming less and less efficient (more costly) due to delays caused by traffic congestion. By investing in EmX, we can begin to increase efficiency and lower the cost per boarding. For example, for a typical route that takes 60 minutes for round-trip travel time, we are currently using 2 buses. As congestion increases, it becomes more and more difficult to maintain a 60-minute round-trip travel time. As the travel time reaches 70 minutes, which some of our routes are now experiencing, we must add a third bus to maintain the 30-minute headway, or reduce frequency. That adds half again the cost of providing that same service. If our community can create transit service that maintains regular travel time and frequent service, such as EmX, our service will be more efficient into the future. Chances are that if LTD does not take these steps, we will be reducing overall service to maintain frequency along the corridors.

LTD believes implementation of the EmX service has not had a measurable negative effect in seniors' access to transit. LTD works closely with our Accessible Transportation Committee (ATC), made up of consumers, providers and advocates for seniors and people with disabilities. LTD also contracts with Alternative Work Concepts, who trains people with disabilities and seniors to ride the bus. While there were concerns when Franklin EmX was initially implemented, we have had very few reports of community members not being able to use the bus due to spacing of stops. It is not in LTD's interest to limit access, as this creates the need to utilize the more expensive RideSource curb-to-curb service required by the Americans With Disabilities Act. Wherever possible, stops have been placed at the major origin and destination points along the route. We have had seniors comment how much easier it is to board EmX, and more convenient it is since it is so frequent.

In January 2010, when the technical analysis began evaluating alternatives, Route #30 was operating and was not anticipated to be eliminated. The analysis was completed and submitted to FTA for review in July 2010. Since that time, Route #30 was eliminated as part of LTD's efforts to reduce costs in response to less funding for bus service; there was no intent to mislead the community.

During the next stage of evaluation, technical analyses will be updated as appropriate.

Project Development Process

- 7 comments
 - Appreciates LTD's efforts to include the community in the decision-making process.
 - Mitigation graphics need to be clearer and available more quickly.
 - Get more project information out in other venues.
 - Elapsed travel time is major factor in most people's mode choice.
 - How will the public be informed about the project and how can they provide feedback?
 - Concerned that project has been decided already.
 - Open houses should include time for questions.
- *LTD Response*

Thank you for your feedback and suggestions. LTD is currently working to improve the mitigation graphics and to more broadly distribute project information.

Transit travel time is a Measure of Effectiveness considered for the first criterion regarding improving customer convenience. Transit travel time was calculated by averaging peak-hour travel time for transit trips from downtown Eugene to two common destinations in the West 11th Avenue Corridor. Shorter travel times were considered more favorable in the rating of alternatives.

Since the project was initiated in 2007, LTD has conducted an extensive outreach process inviting and encouraging the community to assist LTD in developing the best transit investment solution for the West 11th Avenue Corridor. LTD has conducted dozens of open houses, community dialogue workshops, neighborhood meetings, special interest group meetings, and individual meetings with property and business owners. The community is encouraged to attend these project events and ask us any questions they have about the project. LTD has published and mailed 5 project newsletters to more than 14,000 postal addresses and anyone can sign up to receive newsletters by email. The project web site includes project documents, newsletters, fact sheets, media releases, updated meeting schedules, and information about how to contact project staff to talk about the project or schedule a presentation to interested groups. Meetings are also advertised in the local newspaper. Project information is available in Spanish as well as alternative formats such as Braille and recordings on CDs. To date, LTD has received more than 4,000 comments on the project; all comments are documented and considered. Public feedback has been and will continue to be taken in whatever format is best for the individual, including letter, email, fax, telephone, face-to-face discussions, and comment forms.

There are still many opportunities remaining to participate in the project. The Joint LPA Committee will consider feedback from the community prior to determining a preliminary LPA, anticipated in January 2011. Public meetings will be held to review and discuss the preliminary LPA and for the community to provide comments about the preliminary LPA directly to decision-makers. After public review and comment, the Joint LPA Committee will determine the LPA to be advanced for further study, anticipated in February 2011. The advanced LPA

will undergo additional evaluation and public review prior to the Eugene City Council, MPC and LTD Board determining the transit investments for the West 11th Avenue Corridor, anticipated in summer or fall 2011.

The transit solution for the West 11th Avenue Corridor has not been decided. As noted in the previous paragraphs, since 2007, LTD has been engaging the community in discussions to develop the best transit solution. The final decision is not anticipated until summer or fall 2011.

Eminent Domain

- 1 comment
 - Concerned that LTD will use eminent domain to take property from business owners.
- *LTD Response*

LTD did not use eminent domain to acquire needed property for the Franklin or Gateway Corridors. LTD has successfully used a negotiated process to acquire needed property.

WEEE Project

- 2 comments
 - How long is the entire EmX route?
 - Project serves a small percentage of the population, which would be better served with more buses, more satellite service and retaining the number of bus stops.
- *LTD Response*

The proposed West Eugene EmX Extension route is 8.3 to 8.7 miles, roundtrip from the downtown Eugene Station. The length varies by alternative. The entire planned EmX system, when completely built in the future, will be approximately 61 miles.

One of the best indicators of a transit system's success (or effectiveness of a transit investment) is called "ridership productivity", which measures the number of riders per revenue vehicle hour. Based on the most recent reports to the National Transit Data Base, LTD's bus system ranks 30th in ridership productivity out of the 555 bus systems in the entire nation. Our ranking is higher than the bus system productivity in many larger cities such as Seattle, Portland, Houston, Cleveland, Washington DC, Miami, and Detroit.

It may seem intuitive that a better transit solution is to have small buses operating at a high frequency along the corridor. The EmX system plan calls for small buses operating in the neighborhoods that connect with the EmX service and with neighborhood destinations. Small buses are suggested in those applications because they are more compatible with the neighborhood, and ridership on those types of routes is generally low. However, use of small buses along major transportation corridors such as West 11th is impractical and very inefficient. We have overload problems with the 40-foot and 60-foot buses that we currently operate, and that would be much more of a problem with smaller buses. Small buses would have to operate very, very frequently to avoid overloading. The operating cost for that type of system would be extremely high.

It is a misconception that it is significantly less expensive to operate small buses. The operating cost for a small bus, on a per hour basis, is about the same as for

a large bus. That is because about 75% of LTD's operating costs are for labor, and we do not pay operators differently based on the size of the bus. Maintenance costs are about the same for small buses and large buses, and even the purchase price is not much less.

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.