EUGENE CITY COUNCIL
AGENDA ITEM SUMMARY

Work Session: West Eugene EmX Extension

Meeting Date: September 26, 2012
Department: City Manager's Office
www.eugene-or.gov

Agenda Item Number: A
Staff Contact: Lisa Gardner
Contact Telephone Number: 541-682-5245

ISSUE STATEMENT

Over the last six years, Lane Transit District (LTD) has conducted in-depth planning, public involvement, and technical analysis for a proposed West Eugene Extension of the EmX system in the Eugene-Springfield metro area. LTD has completed all of the federal requirements for moving forward with the third leg of the EmX system, including the completion of an Environmental Assessment (EA). The EA is an element of the Federal Transit Administration's (FTA) process to demonstrate and summarize the project's compliance with federal requirements. On July 13, 2012, after more than a year of comprehensive review and refinement of the technical analysis and documentation, the FTA made the formal determination that the EA was a complete, objective, and technically sufficient analysis of the potential impacts on the human, economic, and social environment.

The FTA's formal acceptance and concurrence with a Finding of No Significant Impact (FONSI) with the EA is the remaining step in the federal project approval process.

In addition to getting concurrence on the FONSI from FTA, LTD must also receive approval from the Eugene City Council indicating local support for the project, as outlined in an intergovernmental agreement (IGA) between the City and LTD. The City Council has this opportunity to receive information summarizing the responses from the public comments received regarding the federal Environmental Assessment of the West Eugene EmX Extension project.

The council may take action at this meeting. The motion included in this agenda item summary will meet the requirements of the IGA in indicating council support of the EmX project.

BACKGROUND

The community's comprehensive transportation plan, *TransPlan* (2002), proposed significant increases in the amount and convenience of transit service, increases in the amount of bikeways and sidewalks, and an expansion of transportation demand management (TDM) to help reduce congestion by 48 percent over forecasted trends. One key strategy for transit improvement was development of a Bus Rapid Transit (BRT) network.

The first BRT corridor (locally branded as "EmX") linking downtown Eugene, downtown Springfield, and the University of Oregon opened in 2007. The second corridor to Springfield's Gateway/River Bend area opened in early 2011.

On October 9, 2006, the Eugene City Council identified West 11th Avenue as the City's priority for the next EmX corridor study. The LTD Board of Directors endorsed the Eugene City Council's action.

On March 9, 2011, the City Council voted to support LTD's construction of EmX in West Eugene and selected the $6^{th}/7^{th}/11^{th}$ route as the preferred route for West Eugene EmX. The council held a subsequent work session on February 13, 2012, to receive information on property impacts and mitigation options from Rick Duncan.

The West Eugene EmX Extension Environmental Assessment (EA) was published by the FTA on July 16, 2012. The FTA requires that LTD provide an opportunity for the public to comment on the EA, as well as provide responses to comments received, including any potential new mitigation needed based on those comments. A 45-day review period was held from July 16 - August 29, 2012, during which time over 300 comments were received. A memo from Tom Schwetz and John Evans from LTD is included as Attachment B. A disc of the full comments will be provided to the council, and is available to the public at the City Manager's Office.

RELATED CITY POLICIES

From Eugene-Springfield Transportation System Plan (TransPlan):

TSI Transit Policy #2: Bus Rapid Transit

Establish a Bus Rapid Transit (BRT) system composed of frequent, fast transit service along major corridors and neighborhood feeder service that connects with the corridor service and with activity centers, if the system is shown to increase transit mode split along BRT corridors, if local governments demonstrate support, and if financing for the system is feasible.

From the Growth Management Policies:

Growth Management Policy 11

Increase the use of alternative modes of transportation by improving the capacity, design, safety, and convenience of the transit, bicycle, and pedestrian transportation systems.

From the Envision Eugene Pillars:

Pillar 3: Plan for Climate Change and Energy Resiliency

Plan for growth so that an increasing proportion of residents live in 20-Minute Neighborhoods where residents can meet most of their daily needs near their homes without the use of an automobile. This strategy is intended to reduce the need for, and the reliance on, motorized forms of transportation.

Pillar 4: Promote Compact Urban Development and Efficient Transportation Options

Facilitate the transformation of downtown, key transit corridors and core commercial areas as mixed-use neighborhoods that foster active, walkable, community living by providing a mix of residential, commercial, retail, and public uses in proximity to one another.

Ensure that the transportation system can support planned densities (in coordination with the Eugene Transportation System Plan).

COUNCIL OPTIONS

1. Move to approve the West Eugene 6th/7th/11th EmX Corridor
2. Take no action.

CITY MANAGER'S RECOMMENDATION

The City Manager recommends that the council move to support LTD's construction of the West Eugene 6th/7th/11th EmX Corridor.

SUGGESTED MOTIONS

1. Move to approve LTD's construction of the West Eugene 6th/7th/11th EmX Corridor.

ATTACHMENTS

A. Cover Letter from Ron Kilcoyne, Lane Transit District General Manager, September 11, 2012
B. Memorandum from Tom Schwetz and John Evans, LTD, September 12, 2012
C. CD of Public Testimony received by LTD

FOR MORE INFORMATION

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Lane Transit District

September 11, 2012

The Honorable Kitty Piercy
Mayor of Eugene, and
Eugene City Council
777 Pearl Street, Room 105
Eugene, OR 97401-2793

Dear Mayor Piercy and Council Members:

Lane Transit District (LTD) is pleased to present responses to the public comments received regarding the federal Environmental Assessment (EA) of the West Eugene EmX Extension project as the Eugene City Council considers its process for a formal reaffirmation of the project. The EA is an element of the Federal Transit Administration's (FTA) process to demonstrate and summarize the project's compliance with federal requirements. On July 13, 2012, after more than a year of comprehensive review and refinement of the technical analysis and documentation, the FTA made the formal determination that the EA was a complete, objective, and technically sufficient analysis of the potential impacts on the human, economic, and social environment.

The project has continued to generate an impressive amount of interest and response from the public, and LTD feels it is important for the City Council to review this input. We are providing all comments received in their entirety, along with LTD's initial brief summary of our responses by comment topic areas.

The Federal Transit Administration (FTA) and LTD are addressing in detail all public input related to the content of the EA as part of the project's federal process. The federal process requires a 30-day review period after the EA is complete; however, due to the level of local interest in the project, LTD requested and was granted a 45-day review period (July 16 - August 29, 2012). It is expected that the FTA will find that all significant impacts have been avoided or can be mitigated, and it will issue a formal Finding of No Significant Impact, obligating LTD and the project to all required mitigation.

If the project is reaffirmed by the Eugene City Council and the LTD Board of Directors, LTD will begin the preliminary design and engineering process. This process is expected to occur during the next 18-24 months, with construction beginning in 2015. The first step of the preliminary design process will be working with property owners along the corridor to develop acceptable project refinements, consistent with all mitigation, to best meet the interests of property owners, businesses, and the project. The new EmX service could open to the public by early 2017.

Thank you for your continued careful consideration of this important project for our community.

Sincerely,

Ronald J. Kilcoyne
LTD General Manager

RK:JE:jms

Enclosures

The Best Way to Connect

Lane Transit District

Memorandum

To: City of Eugene City Council

From: Tom Schwetz and John Evans, LTD

Date: September 12, 2012

Re: Summary of Public Comments on West Eugene EmX Extension EA and LTD's Responses

The West Eugene EmX Extension Environmental Assessment (EA) was published on July 16, 2012. The EA was available electronically through LTD's web site, and electronically and hard copy review versions were available at the City of Eugene, the Eugene and Springfield Public Libraries, and LTD's Administrative offices. During the 45-day public review period from July 16, 2012 through August 29, 2012, LTD and FTA received over 300 comments. A summary of the comments and LTD's response to those comments follows. Copies of all comments received by LTD and the Federal Transit Administration during the public review period are included as Attachment 1.

Please note that these are LTD's initial summary responses only and are not part of the formal process required by the Federal Transit Administration (FTA) under the National Environmental Policy Act (NEPA) and have not been reviewed by FTA. LTD is providing these summary responses to assist in the City of Eugene's legislative process. FTA's federal environmental review process for the project will also include responses to comments, which may be more detailed and which will be specific to the NEPA process.

Cost

Comments about cost generally focused on:

- Why LTD was building EmX when it was cutting regular bus service;
- The validity of the construction, operating and maintenance cost projections;
- Project does not account for cost and supply impacts of peak oil; and,
- Money should not be spent on transit projects when there is a federal deficit and other priorities.

Response:

LTD's long range financial plan does not envision any further reductions in service hours and in the long term it anticipates the ability to expand service hours.

LTD is funded through a payroll tax and this tax is sensitive to swings in the local economy. In the late 1970's LTD and the community faced the areas deepest recession. Over 30 percent of LTD's service was cut. Recessions in 2001 and the most recent recession have led to reductions in operating revenues and subsequent cuts in materials and services, personnel, and in bus service. The District's Board of Directors is evaluating maintaining larger reserves in order to bridge these downtowns in the future. LTD allocates funding each year to address running time issues that result from increased ridership and additional traffic on our roads. The addition of these funds is a priority and the Board of Directors is committed to funding these additional hours of service. Overall system performance, based on indicators such as on-time performance and ridership, remains high. As our economy continues to improve, LTD will have additional funds to invest in the system. How these funds are prioritized will involve feedback from current riders and from residents who live in areas not currently served.

Regarding concerns that the project's operation costs are underestimated in the EA, the REMI analysis submitted by OMOT incorrectly assumes that the 2031 bus miles in Table 2.2 of the EA are what LTD would operate in 2017. The bus miles in table 2.2 of the EA reflect an operating scenario for the 2031 Regional Transportation Plan which includes increases to regular bus service throughout the system that would be operated by 2031. This operating scenario is financially feasible in 2031 based on the current analysis. However, it is not feasible and should not be used to develop operating costs for 2017. At this point in time, LTD is planning to maintain regular bus service hours in 2017, and to consider service expansion based on available resources.

Additionally, the REMI estimate uses cost factors from the project's Fully Allocated Cost Model (FACM) to estimate the cost of the increment of service that would be added with EmX starting in 2017. The FACM factors are not the appropriate factors to use in estimating the cost of an increment of service. Because of economies of scale, the increment of service LTD would add with the WEEE project can be provided for much less cost. The FACM factors are too high. Rather, a more direct-cost approach should be taken to identify the incremental costs of actual changes that would occur in implementation of the additional service. That is the approach used to estimate operational costs in the EA. If the annual operating cost was $4M LTD would share their concern, however it clearly will not for the reasons noted above.

Regarding the potential cost and supply impacts of peak oil, EmX provides one of the best "early mitigation" activities this region can use in preparing for peak oil and GHG emissions reduction. This is due to its ability to use existing technologies to provide a more cost effective operation combined with its significant success in attracting new riders. As events unfold around the peak oil and GHG issues, BRT gives this region the nimbleness to readily adapt as more sustainable technologies are developed.

As a bus rapid transit strategy, EmX provides tremendous flexibility to adapt to future developments in propulsion technology. As these technologies advance, they can be adapted by LTD without significant additional change to the BRT lanes (or perhaps more appropriate here – high capacity transit lanes).

Finding a sustainable propulsion technology is a key strategic issue for transit service locally, nationally and around the world. As a result, propulsion technologies are expected to advance more aggressively in the future. As an example of recent advancements, the EmX vehicles purchased in 2010 are demonstrating a substantial increase in fuel economy over the vehicles purchased in 2006. EmX's flexibility will be a critical part of this region's preparedness for both peak oil issues and potential requirements for greenhouse gas emission reductions.

The costs and benefits of alternative forms of propulsion are weighed by transit with very limited resources during budget discussions. There are significant and difficult trade-offs between the ability for a transit district to maximize its service to the community in the short run and the need to find and adapt more sustainable technologies over time.

Issues associated with peak oil go well beyond the WEEE project, affecting transportation specifically and the overall economy generally nationwide and globally. Solutions addressing these issues will come from actions taken at all levels, but, given the scale of the issues, most effectively in collective actions taken at state, national and global levels.6769o788758u8p080

The comments related to the appropriateness of federal spending on transit projects or other public infrastructure are best suited to national public policy discussions, and are not appropriate for review or discussion in the EA.

Process and Documentation

Comments about the process and the EA documentation generally focused on:

- The EA fails to identify the Purpose and Need for the project;
- The EA presupposes the outcome by failing to fully evaluate all of the mode and alignment alternatives;
- There was inadequate analysis to support the findings of the EA;
- Too many documents and reports and too much detail for the general public to understand;
- Too little detail and not enough supporting documents and reports to support the findings of the EA;
- There was inadequate public process for the project; and,
- There was inadequate review by local, state and federal agencies.

Response:

The project's Purpose and Need are clearly summarized in the Executive Summary of the EA on page ES-4:

> The proposed WEEE project would implement high-capacity public transportation service in the West 11th Avenue Corridor using the bus rapid transit system identified in the adopted Regional Transportation Plan (RTP), extending the system's safe, efficient, effective, dependable, and visually appealing transit service to an important area.

The project's "Purpose and Need Statement" and "Goals and Objectives" are also provided in their entirety and discussed in detail Chapter 1, Purpose and Need. As described in the EA, starting in 2007, LTD used an extensive scoping process to develop the project's Purpose and Need. This process included a very involved public process that considered a wide array of viewpoints. Ultimately, the WEEE Corridor Committee recommended a Purpose and Need statement that was adopted by the LTD Board. The overall process and the project's resulting formal "Purpose and Need Statement" were reviewed by numerous federal, state and local agencies and minor revisions were made based on agency review and comment.

The EA is based on years of documented analysis and consideration of a wide range of alternatives and does not presuppose an outcome. The Alternative Analysis process selected a Locally Preferred Alternative to advance "the LPA/ the project" for further detailed analysis in the EA. The LPA was selected as a local community decision following the analysis of all previous alternatives and routing options (documented in reports listed in Chapter 12 of the EA); the LPA as refined through the Alternatives Analysis process represents the community's preference, not LTD's or that of its consultants. The selected project balances the many trade-offs reviewed and weighed in the Alternatives Analysis process.

The numerous project studies conducted since 2007 supporting the findings of the EA are referenced throughout the document and listed in Chapter 12 of the EA. Also listed in Chapter 12 are other memos and reports documenting the project's extensive process to develop with the public, decision-makers, and agencies a broad range of alternatives and then evaluate, consider and narrow the alternatives to select an LPA. The EA, as required by FTA, summarizes all of the complex analyses completed for the project and is written to help the general public understand the project issues, tradeoffs, impacts, benefits, and mitigation. The more detailed supporting studies referenced throughout the document are available on LTD's website and on CD or print for those interested in more in-depth project information.

This project has evolved over several years and has undergone extensive public review and revision. The many documents referenced in the EA correlate directly with the depth of analysis to which the project has been subjected. Rather than obscuring anything, the EA provides a balance between producing an easy to understand summary of the most relevant analyses for the general public while still providing all the necessary references to the many supporting, more detailed studies that have been produced over the project's history.

Since 2007, LTD has engaged local, state and federal agencies in the development, review and refinement of the project. These efforts are well documented in the EA, particularly in Chapters, 1, 6, 7 and 12.

Environmental Justice

Background:
A formal federal policy on environmental justice was established in February 1994, with Executive Order 12898 (EO 12898), "Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations." There are three fundamental environmental justice principles:

- To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.
- To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
- To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

Comments about impacts to Environmental Justice populations generally focused on:

- EmX will be difficult to use by elderly and disabled citizens; and,
- The project failed to consider or mitigate impacts on minority owned businesses

Response:

The input LTD has received from transit users is that the majority of seniors and those with disabilities find EmX easier to use than regular bus service. Features including level boarding, the greater capacity to carry mobility devices given the EmX higher frequency, and easier access to EmX boarding platforms make EmX more comfortable, more convenient, easier to use, and safer for those with accessibility issues. In addition, EmX stops are chosen with consideration for their proximity to housing and key destinations for the accessible community. There may be some individuals whose personal experience is less favorable with EmX but the majority of people with accessibility needs prefer EmX.

Since the project's initiation in 2007, LTD's communications about the WEEE project included outreach to all property owners, residents, and tenants within one-half mile of the corridor, the broader community via news and radio advertisements, the web, and social media; and targeted outreach to groups that connect with subsets of the community including minorities, seniors, those with accessibility needs, etc. Many materials were translated into Spanish and interpreters were provided upon request. In addition, LTD staff visited many businesses door-to-door and upon request to discuss the project and document their preferences for design changes to minimize impacts.

Business and Property Owner Impacts

Comments on impacts to businesses and property owners generally focused on:

- Businesses will lose parking;
- Businesses will lose revenue during construction or close as a result of construction;
- Once operating, EmX will make it difficult for my customers to get to my business;
- Other EmX projects hurt my business; and,
- EmX does not offer enough community benefit to justify eminent domain.

Response:

Along the nearly nine mile corridor, the project design would decrease parking on private property by only approximately 18 spaces at a total of five businesses. Through the mitigation provided in the EA, LTD has committed to working with private property owners during the final design stage to use existing right-of-way, sidewalk reductions and / or station design modifications, wherever possible, to minimize property and parking impacts. Additionally, LTD has committed to providing parking lot redesign / restriping where feasible, to further reduce or minimize parking loss on private property. On-street parking would decrease by 53 spaces. However, LTD will explore additional design refinements to preserve these parking spaces wherever feasible.

Construction along the corridor would not occur until the spring and summer of 2015, which gives businesses nearly three more years to emerge from the current recession. LTD will maintain access to all businesses during construction. As with other construction projects, LTD would use public communications and signage to inform the community that businesses are open for business. Where permitted by the City of Eugene, LTD would perform roadwork at night to minimize impacts on business and traffic. Road construction is expected to occur in short segments, e.g. two- to five-blocks at a time, so that each segment can be completed within a few weeks. This construction strategy would occur on one side of the street at a time to further limit the extent of construction impacts. LTD's experience with the construction of the first two EmX corridors has provided LTD staff and its construction contractors valuable information regarding how best to minimize the disruption that is caused during construction.

LTD does know that businesses experienced temporary impacts during construction of the Franklin and Gateway EmX corridors, and LTD and its contractors worked with businesses to minimize these impacts. Such impacts occur across our community when roads are repaved, sidewalks are rebuilt, and utilities are moved or upgraded. It's worth noting that no businesses were forced to close by any short- or long-term effects of the Franklin and Gateway EmX projects. The Gateway EmX project was constructed in 2009-10 and opened in early 2011—all during the current economic recession period.

The detailed traffic analysis indicates that the project will not degrade traffic capacity on West 6th, 7th, and 11th Avenues; in fact it will improve travel for all vehicles.

The proposed EmX design for 6th, 7th, and 11th Avenues does not restrict access to businesses or intersections. Customers arriving in cars will not be required to travel out of direction and customers arriving by foot, bike, or transit should find it easier to access businesses along the proposed corridor. The fully traversable curbside lane design ensures access is retained along the entire corridor. Additionally, those customers arriving by vehicle will find it easier to turn into businesses where "business access and

transit" (BAT) lanes are constructed. BAT lanes will be shared with the bus, allowing slower moving vehicles to be removed from the through travel lanes.

Very little property will be purchased in the portions of the corridor where roads are widened, and owners will receive fair market value for their land and improvements.

LTD is authorized to utilize eminent domain. Eminent domain has been successfully used to construct capital infrastructure projects throughout our community, including the first two EmX corridors. The use of eminent domain along the first two EmX corridors resulted in the negotiated purchase of all property necessary to complete the projects successfully. The eminent domain laws have been developed to protect the property owner and ensure a fair process. In the event the property owner disagrees with the financial offer made by the District, a jury trial process for resolving the disagreement is available to the property owner. No jury trials have been required during the construction of the first two EmX corridors and it is LTD's desire that all West Eugene property purchases be negotiated in a timely and fair manner.

The current route design has been significantly modified over the past several years. These design changes purposely minimize the impacts to business and residential properties along the route by ensuring access and maintaining parking. Of the 477 properties that front the proposed route, 117 will have some level of property impact. These impacts range from minor strips of land that need to be purchased to more significant property purchases that affect a few properties. All impacts are outlined in the EA Appendices 3-1 and 3-2. During the project development phase, LTD would continue working to reduce impacts further. This additional engineering work is expected to yield positive results and that means fewer property impacts.

Traffic

Comments on traffic and transportation generally focused on:

- The traffic analysis was not rigorous enough;
- The traffic analysis contradicts the 1987 traffic study showing the need for 4 full lanes on 6th / 7th;
- The LPA would reduce auto and freight capacity on 6th / 7th;
- The LPA will increase traffic congestion and create safety problems;
- The proposed changes and the traffic impacts have not been reviewed and approved by local, state and federal agencies; and
- Concerns about dedicated transit lanes versus “BAT” lanes.

Response:

The traffic analysis conducted for the EA was the same level of detail as would be submitted for a DEIS. If a DEIS were to be completed for this project, the traffic analysis findings, results, analysis and methodology would be the same as for the EA. ODOT issued a review letter (Dorothy Upton, September 30, 2011) which stated “it is not necessary for ODOT to perform any additional analysis of the LTD proposal for the expansion of the BRT in West Eugene”.

The traffic analysis prepared for the EA considered a different approach to maximizing the traffic operations of the 6th/7th Avenue corridor than the 1987 study. The traffic analysis for the EA has focused on improving the capacity and operations of the most critical intersections along both 6th Avenue and 7th Avenue such as at Garfield Street, Chambers Street, Blair Boulevard, Monroe Street, Madison Street, Jefferson Street and Washington Street. At these critical intersections additional turn lanes (BAT Lanes) are proposed in addition to the existing lane configuration to improve capacity of these critical intersections as well as the corridor. At other non-critical intersections along the corridor, and at locations east of Washington Street where the traffic volumes are significantly lower, a reduction in the number of through travel lanes is proposed as part of the LPA. Detailed traffic analysis demonstrates that the overall corridor travel times will decrease with the approach taken in the LPA.

The LPA maintains four through travel lanes on 7th Avenue from Garfield Street to Washington Street and adds additional turn lanes (BAT lanes) at several critical intersections in this segment. The LPA maintains four through travel lanes along 6th Avenue from Washington Street to Garfield Street except between approximately Blair Boulevard and Fillmore Street where only three through travel lanes are provided along with a fourth lane for left turning and BRT vehicles (a BAT lane). There is one signalized intersection in the proposed three through lane section on 6th Avenue at Polk Street. The LPA includes an additional southbound right turn lane on Polk Street which increases capacity and allows green time that would have been provided to the Polk Street movements to be transferred to the 6th Avenue movement. The 6th Avenue/Polk Street intersection is not the critical intersection of the 6th Avenue Corridor. The future year traffic operations at the 6th Avenue/Polk Street intersection with three through lanes on 6th Avenue and a westbound left turn lane (the BAT lane) plus the improvements on Polk Street (as described above) will be the same or better than with the existing lane configuration at the intersection. Corridor travel times in the future (year 2031) with the LPA are less than with the existing lane configuration.

The traffic analysis for the EA therefore does not contradict the findings of the 1987 study but enhances it with analysis of a different way of maximizing corridor traffic operations that was not considered in the 1987 study. The EA traffic analysis also utilizes the most recent regional land use and traffic volume forecasting data available. ODOT has reviewed the traffic analysis completed for the EA and has confirmed its findings and conclusions.

Professional, peer reviewed analysis has shown that the project will:

- Reduce traffic congestion,
- Reduce travel times, and
- Improve traffic conditions for both cars and transit along the corridor, including on West 6th and 7th Avenues.

The West Eugene EmX project would add capacity to eight intersections along the corridor. The Business Access and Transit (BAT) lanes proposed for the corridor would be shared with turning vehicles, and serve as refuge turning lanes for traffic, which would allow the remaining travel lanes to operate more efficiently. The project proposes to construct BAT lanes along approximately 67 percent of the 11th Avenue alignment.

This means that the West Eugene EmX Extension would preserve or improve traffic flow along the corridor. Without the project, traffic on the corridor would continue to degrade with increasing traffic congestion and delays for both regular traffic and buses.

All vehicles using the transportation network will experience fewer congested intersections, which will improve travel for all vehicles. The Oregon Department of Transportation (ODOT) supports the project, in part because its technical reviews have proven that the project would preserve or improve the capacity of its roadways for all vehicle traffic.

All but two of the BRT stations along 11th Avenue are located in BAT lanes which will not impact through travel lane operations. The two BRT stations along 11th Avenue located within mixed flow will have the potential to delay through lane operations similar to buses today.

Throughout the project, the project team has coordinated with local, state and federal agencies regarding the conceptual designs and evaluations of those designs; modifications have been made to project designs based on agency feedback. The project team is currently coordinating with the City of Eugene, ODOT, FTA and FHWA regarding approvals for the proposed project-related improvements.

The Business Access and Transit (BAT) lanes have always been one of the many ways in which BRT infrastructure can be configured to deliver lower and more reliable transit travel times and reduced operating costs per boarding. As LTD has planned and implemented the EmX system over the past 15 years, it has evaluated the trade-offs between different types of lane dedication. The underlying design approach for the West Eugene EmX extension project has been to balance the impacts to adjacent properties with achieving the operational goals for EmX in the corridor. BAT lanes have allowed that balanced to be achieved, minimizing the impact to adjacent properties while achieving lower and more reliable transit travel times and reduced operating cost per boarding for EmX in the corridor.

Other Environmental Impacts

Comments on other environmental impacts generally focused on:

- The project will remove established trees;
- The project will kill animals;
- The project will cause more pollution; and,
- The EA does not adequately provide or discuss mitigation measures.

Response:

Trees, wetlands, animals and other environmental factors will be affected by the construction of this project. Throughout over three year process to design and refine the WEEE project, LTD actively sought ways to avoid impacts to the environment; however, not all impacts were avoidable. The EA, which has been thoroughly reviewed and approved by the FTA, has determined that after measures to avoid and reduce impacts, the remaining impacts on trees, wetlands, animals, and other environmental attributes would be insignificant. For example, less than 0.05 of an acre of wetland would be permanently impacted on the nearly nine mile corridor. In addition to FTA's review, LTD and FTA have coordinated with other

federal, state and local agencies responsible for protecting the environment. As part of this coordination effort, LTD has committed to measures to offset potential impacts to the environment. For example, the WEEE project would replant as many or more trees as are removed. The species of new trees would conform to the City of Eugene street tree guidelines, and would consider the preferences of property owners and tenants where allowed by City ordinance.

It is important to note that some environmental attributes are anticipated to improve. For example, the project is likely to improve air quality over time. There is extensive evidence that documents greenhouse gas emissions reductions resulting from increasing transit ridership.

The possible impacts and all associated mitigation is summarized in the Executive Summary of the EA, discussed in EA Chapters 3 and 4 in relation to potential impacts, and is detailed in the EA's first appendix (ES-1).

Consistency with Local Regulations

Comments on consistency with local regulations generally focused on:

- The project is not consistent with Eugene's land use plans related to nodal development; and,
- The project is not consistent with Envision Eugene.

Response:

The decision to include the West Eugene EmX corridor as the next link the EmX system is based upon adopted policies for our region. Throughout the project, City staff participated in the development, review and refinement of the WEEE project and, as a result, the project is consistent with the City's land use plans, including the City's most recent long range planning efforts, Envision Eugene. The reports supporting the Envision Eugene effort identify employment and housing areas along the West 11th Avenue corridor, which is designated as a key transit corridor to support current and future housing and employment in west Eugene. As noted in the EA, the EmX system would support City policies and programs that encourage nodal development areas (identified in regional transportation plans) and those that encourage employment and housing development in the corridor within the UGB.

Transit Service and Ridership

Comments on transit service and ridership generally focused on:

- Improving regular bus service instead of implementing BRT;
- Existing bus service is sufficient;
- Projected ridership does not justify the cost to implement EmX;
- Project will only serve a small percent of the people;
- LTD should be more self-sustaining before expanding service; and,
- Public transit should be self-supporting.

Response:

Given the realities of our area's traffic patterns and the costs of providing additional bus service, it would be more expensive to continue to increase regular bus service than to expand EmX service. EmX was developed to address the long-term costs and service impacts of traffic congestion on transit. The extension of EmX service to West Eugene will avoid the costs of congestion over at least the next 20 years and will increase transit travel speeds by 14 percent to 37 percent. This will lock in operating efficiency in the corridor and allow the District to stretch operating dollars.

More, smaller buses would not be less expensive. LTD would have to purchase and maintain a larger fleet that includes more buses of various sizes. Our primary costs are the cost of bus operators and fuel. Switching from a large to a small bus does not save on driver pay, and the savings in fuel efficiency of smaller vehicles is not enough to overcome higher fleet maintenance costs.

Instead, a more frequent, fast, and reliable service provided on major corridors attracts more passengers, thus serving more people per hour. This improves LTD's operating efficiency.

LTD's ridership productivity ranks in the top 10 percent of all transit systems nationwide. The heaviest customer loads occur during the peak travel periods, while some routes experience standing loads at various times throughout the day. The investment in an enhanced transit service like EmX provides short-term and long-term benefits. In the short-term, more riders are attracted to fast, frequent and reliable service, which is why EmX has been successful in increasing ridership. The combination of service factors provided by EmX combines to provide a service that people find attractive. Frequency of service, which would increase from four time per hour (current frequency as far as Oak Patch Road) to six times per hour, is a prime factor in making public transportation attractive to non-riders The long-term benefit is that public transportation will play its part in reaching the community's goals. EmX is not intended to be "the solution," but rather a part of the solution. Other transportation system improvements and land-use decisions will be coupled with public transportation improvements to allow our community to keep up with its growing needs.

It's important to note that EmX ridership almost doubled in the first year and is now about triple the ridership of the regular bus service that preceded it along the Franklin EmX corridor with the same 10 minute frequency. With the addition of the Gateway corridor, EmX now averages between 9,200 and 10,200 boardings each weekday (the variance depends on the time of year). For example comparing ridership from April 2011 to April 2012, LTD ridership increased by 1.5 percent system wide, while EmX ridership alone increased by 8.7 percent. Clearly, EmX attracts more riders than are attracted to regular bus service.

Through a variety of measurements, the extension of EmX to West Eugene will improve transit ridership within the corridor and throughout the system. System-wide transit trips have been projected to increase by 500,000 annually in opening year, with as many as 45 percent of all transit trips in the region using the EmX system. Transit mode share—or the shift of people choosing to use transit over other transportation options—will increase significantly throughout all EmX corridors. And finally, one-third of the new trips will be made by riders with limited transportation options, showing that the service is continues to

improve a needed community service while also accomplishing community goals around attracting new riders to transit.

Our region's use of transit in terms of productivity exceeds that of many much larger communities. In fact, based on 2010 National Transit Database figures, our productivity and ridership exceed that of most regions. In productivity (boardings per vehicle hour) LTD was ranked 29th out of the over 500 transit services, and for absolute ridership, LTD had 11.4 million boardings in 2010 and was ranked 71st overall. This compares favorably with other even much larger transit districts including Phoenix, Memphis, Snohomish, Jacksonville, and Riverside.

A comparison of the number of people and jobs along the Franklin and Gateway EmX routes, with that of the West Eugene EmX 6th/7th/11th corridor indicates that while the Franklin line has higher employment with downtown and the University, the existing and projected population and employment for the West Eugene corridor is similar or higher for than that of the successful Gateway corridor, and higher in existing and projected population compared to the Franklin line. While the Franklin and Gateway are successful now, both will be further complimented by this extension of the system that provides a greater overall level of service and connectivity that enhances our community. The total benefits of EmX corridors and the EmX system will best be seen over time as more of the system is built out.

All transportation modes are subsidized at some level and the ability of transit users to fully fund operations was last seen in the United State in the late 1960's and early 1970's. During the transition to government funded transit services, the mandate was to ensure that people in our communities had a cost effective way to access jobs, education, recreation, medical services, etc. A number of federal guidelines, along with state and federal legislation govern the setting of transit fares. Title VI of the Civil Rights Act outlines specific analyses that require transit districts to show that fare pricing does not discriminate based on a person's national origin. Similarly, Executive Order 12898 outlines restrictions that apply to minority and low income populations. Senior citizens and people with disabilities are required to only pay one-half the full adult rate. Paratransit rates cannot exceed two times the adult cash fare. This illustrates that transit districts must work within the many laws and requirements while developing fare structures that provide the greatest opportunity to increase revenues generated from the fare box. While the social service aspects of public transportation continue to be fundamental part of what transit agencies provide, today's opportunities for providing viable alternatives to single occupancy car travel offer economic, social, and environmental benefits. The development of EmX service provides a regional network of routes that provide a level of choice that accommodates the governmental mandate to provide access while at the same providing an enhanced level of service that many residents will choose to ride over driving their car.

Finally, as described in Chapter 5 of the EA, it's important to remember that the project's overall improvements to transit service would be provided at a lower cost per rider to LTD, and that LTD's long range financial plan does not envision any further reductions in service hours, while in the long term LTD anticipates the ability to expand service hours.