



West Eugene EmX Extension Project

FINDING OF NO SIGNIFICANT IMPACT

Eugene, Lane County, Oregon

December 20, 2012



Lane Transit District



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

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Seattle, WA 98174
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December 20, 2012

Mr. Ron Kilcoyne
General Manager
Lane Transit District
P.O. Box 7070
Springfield, OR 97474-0470

Re: West Eugene EmX Extension Project:
Finding of No Significant Impact

Dear Mr. Kilcoyne:

The Federal Transit Administration has reviewed the Environmental Assessment (EA) for the West Eugene EmX Extension Project (July 2012). This project proposes to use Bus Rapid Transit to connect west Eugene with downtown Eugene and the City of Springfield.

Based on our careful consideration of the analysis and conclusions in the EA, we have issued a Finding of No Significant Impact (FONSI) for the West Eugene EmX Extension Project. A copy of the FONSI is enclosed.

Please be advised that in accordance with 23 C.F.R. § 771.121, Lane Transit District (LTD) must transmit a copy of this FONSI to any affected units of Federal, State, and local government. LTD shall also ensure that the document is available upon request by the public, in accordance with 23 C.F.R. § 771.121(b). The FONSI and its supporting documents must be accessible on the project's website, www.ltd.org. FTA suggests that LTD also send copies to consulting parties.

Please contact Dan Drais at 206-220-4465 if you have any questions.

Sincerely,

R.F. Krochalis
Regional Administrator

cc: John Evans, LTD

FEDERAL TRANSIT ADMINISTRATION
REGION X

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Introduction

This document explains the determination by the Federal Transit Administration (FTA) that the West Eugene Emerald Express (EmX) Extension Project (Project) proposed by the Lane Transit District (LTD) in Eugene, Oregon is not likely to have a significant adverse effect on the environment. FTA's finding is in accordance with the National Environmental Policy Act of 1969 (NEPA) (42 U.S.C. § 4332 *et. seq.*).

The Locally Preferred Alternative (LPA) analyzed in the EmX Environmental Assessment (July 2012) (EA) resulted from extensive planning and public involvement, and includes considerable differences from the project as first proposed. The following context is useful.

In 2007, LTD initiated studies of transportation alternatives in anticipation of seeking funding under FTA's New Starts program. Later in 2007, FTA announced its Notice of Intent (NOI) to Prepare an Environmental Impact Statement (EIS) for the project (72 FR 53281 (Sept. 18, 2007)). The DEIS would be prepared jointly with a New Starts Alternatives Analysis (AA).

At that time LTD identified a relatively wide range of conceptual alternatives to study. Through public and agency feedback and environmental screening, the range of alternatives was reduced by eliminating those that were infeasible or would result in too many negative impacts. The remaining alternatives were advanced to conceptual engineering refinement. Those alternatives included bus rapid transit (BRT) and regular bus options.

From summer 2008 through summer 2009, FTA and LTD consulted with the U.S. Army Corps of Engineers (Corps), the Bureau of Land Management, the U.S. Fish and Wildlife Service, and the Oregon Dept. of State Lands to assess the project's potential effects on protected species and wetlands. LTD subsequently modified conceptual alternatives to avoid impacts to resources. In February 2009, Corps input led to clarifications to the project's Purpose statement.

During 2008 and 2009, in response to agency and public feedback about potential impacts, LTD produced a range of four BRT alternatives which, including design options, combined to create 56 different combinations. In early 2010, LTD conducted technical impact studies on the 56 routing combinations and also on a No-Build Alternative and a Transportation System Management (TSM) Alternative (which would attempt to use non-capital-intensive solutions to address the project purpose and need), as required under FTA rules. By June 2010, after considering technical studies, LTD staff

recommendations, public input, and advice from the Eugene City Council, and after consulting with FTA and the Corps, the LTD Board eliminated 46 unique BRT routing combinations from further study. These included all full-length alternatives west of the Commerce Terminus Station, all Seneca Terminus short-length alternatives, and all Amazon Alternatives. The Board advanced the No-Build and TSM Alternatives plus 10 BRT Alternatives (with design options) for further consideration in a detailed Alternatives Analysis (AA).

In the spring of 2011, FTA considered whether project changes since 2007 made an EIS unnecessary. Among the important changes: the 2011 alignment ended some two miles east of the original terminus, thereby avoiding serious issues with wetlands, endangered species, and recreation/parkland; it mostly avoided the Amazon Channel and adjacent trail; and it eliminated previously proposed street improvements that would have used property from several historic properties along the corridor. Further, based on early design work, the revised proposal appeared to reduce substantially the number of parking spots that would be eliminated; appeared to require much less property acquisition than what was earlier anticipated; and affected far fewer street and landscape trees than the initial alternatives.

Accordingly, based on the information then in hand, FTA found under 23 CFR 771.119(a) that an EIS was no longer clearly required. (“An [Environmental Assessment] shall be prepared . . . for each action that is not a [categorical exclusion] and does not clearly require the preparation of an EIS.”) The Corps of Engineers, which was the only federal cooperating agency, concurred. In making this decision, FTA did not find that the project would not significantly affect the environment, a determination of effects that could only be made with the benefit of the additional information and analysis. Under FTA regulations, an EIS might still be required at any point in the process if a determination of significant adverse impacts was made.

Later in 2011, the project’s three local decision-making bodies (Metropolitan Policy Committee, Eugene City Council, and LTD Board of Directors) reviewed the findings of the AA Report (LTD, August 2011) along with substantial public and agency input. After careful consideration, they eliminated the TSM Alternative and nine BRT Alternatives and selected one BRT alternative as the LPA to advance for further study in an EA. The EA evaluated the LPA and a No-Build Alternative, which serves as a baseline against which to evaluate the potential effects of the LPA. The No-Build Alternative would include the region’s existing transportation facilities, plus the capital improvements identified in the region’s current Regional Transportation Plan (RTP), with the exception of the planned extension of the existing EmX line into West Eugene.

The EA was published on July 16, 2012 and made available for public review and comment pursuant to CFR Section 771.119.

The Proposed Project

The West Eugene EmX Extension (WEEE) Project will be an 8.8-mile (round trip) westerly extension of the Franklin/Gateway EmX BRT line (Figure 1). When the extension is complete, the EmX Line will link residential and commercial activity centers in the West 11th Avenue Corridor (the Corridor) with the region’s two central business districts (Eugene and Springfield) and the region’s two largest employers (the University of Oregon and Peace Health Hospital). The EA contains a full description of the project. In brief, the LPA will include construction of approximately 5.9 miles of new BRT lanes. In places the alignment will be BRT-only, but more of it will be Business Access and Transitway (BAT) lanes in which BRT service will share lanes with turning vehicle traffic. The use of BAT lanes allows the project to avoid impacts to historic properties, maintain access to private property along the alignment, and reduce the amount of private property acquired for the project. The project includes 13 new BRT stations (or station pairs). Like the 24 existing BRT stations, the new stations will have level boarding, shelters, real-time passenger information, and fare-vending machines. The project includes several intersection and traffic-signal improvements to help traffic flow, as detailed in the EA. It also includes a variety of improvements to bicycle and pedestrian transportation, the most notable being two bike/pedestrian crossings of the Amazon Channel (near Buck Street and Wallis/West 12th). Included in the project are seven new 60-foot articulated hybrid electric BRT vehicles similar to LTD’s existing fleet of 11 BRT vehicles. Because LTD has existing excess capacity at its bus and BRT maintenance facility, the project will not include any expansion of its maintenance facility or storage yard. Also, the project will not need to expand the number or capacity of Park and Ride lots beyond what is already planned to be in place by 2017.

Figure 1. Project Vicinity and BRT Network



LTD expects to begin building the WEEE project in 2014-15 and to start operating it in 2017. It estimates that the project cost, in inflated year-of-expenditure dollars, will be \$95.6 million. The WEEE budget assumes funding from FTA's Section 5309 Small Starts program (\$74.9 million) and state lottery bonds (\$20.7 million).

Agency Coordination and Public Opportunity to Comment

As detailed in Chapter 7 of the EA, LTD has used many techniques to engage public and agency stakeholders, allowing them access to project information and the chance to shape the project. To reach out to the project's diverse stakeholder groups, LTD offered meetings, briefings, workshops, field tours, newsletters, postings on the project website, media releases, radio advertising, open houses, information booths at community events, and public forums.

LTD has taken input about the project via telephone, e-mail, comment forms, meeting notes, social media, public meeting testimony, and letters. During the year before the LPA selection took place, for instance, LTD logged 1,225 comments about the project. Public input has been categorized by environmental subject and was considered by the project team throughout the environmental analysis and design refinement. LTD appropriately considered the input it received and incorporated suggestions.

The WEEE EA was made available for public review and comment for 45 days from July 16, 2012 through August 29, 2012 (and then extended to September 5, 2012). Advertisements and notices about the availability of the EA and the public review period were published or sent between July 16 and July 27, 2012. Appendix A contains copies of the legal notices, advertisements, electronic communications, and postcards. Advertisements were published in three local papers: *The Register-Guard*, *Springfield Times*, and *Eugene Weekly*. Approximately 326 individuals in the project database were sent electronic mail with the Notification of Availability (NOA) of the EA and its Appendices and supporting technical reports. On July 16, LTD sent approximately 1,000 electronic newsletters with the EA NOA information to individuals and organizations listed in LTD's general communications database. Ninety individuals or mailboxes at agencies and tribes were sent availability information by electronic mail. LTD sent hard copies of the EA itself to 15 individuals at agencies and tribes, and made hard copies available to the public at the Downtown Eugene Public Library, the LTD Customer Service Center, LTD's Administrative Offices, and the City of Springfield at the Springfield Public Library.

LTD also held two drop-in sessions during the review period where LTD staff were on hand to help the public review the EA and answer questions about it.

Written Comments and Responses on the EA

Appendix B to this FONSI includes the 329 written letters and emails received during the public review period of the EA (including a one-week grace period thereafter) and responses to the substantive comments that were submitted. LTD and FTA received 1,569 separate comments on the EA. The comments did not reveal any material new information or raise any issues that require new analysis. Table 1 shows the 45 general topic areas on which comments focused. (“Response #” refers to the response table in Appendix B; “Number of Comments on Topic” means the number of times (approximately) that commenters raised this point.)

Response #	Comment Topic Area	No. of Comments on Topic
1	Expression of opposition to or support for the WEEE project	210
2	Assertion that LTD did not consider writer’s opinion or did not do what majority wants	52
3	Assertion that LTD’s data, analysis and projections are wrong or inconsistent	70
4	Expression of an opinion about public policy issues that are not NEPA issues	89
5	Assessment of LTD’s ability to afford to build West Eugene EmX	49
6	Comments on project costs	105
7	Comments on peak oil concerns	3
8	Assertion that other priorities/federal deficit should take priority over spending on transit projects	52
9	Comments on project purpose and need	46
10	Adequacy of evaluation of all mode and alignment alternatives	47
11	Adequacy of analysis (generally)	72
12	Adequacy of EA documentation	17
13	Assertion that benefits do not outweigh the impacts	17
14	Comments on public process	23
15	Adequacy of review by other agencies	12
16	Ability of elderly and disabled citizens to use EmX	10
17	Impacts on special populations	15
18	Parking impacts on businesses	26
19	Construction impacts on businesses	67
20	Operating impacts on businesses	66
21	Assertion that other EmX projects hurt commenter’s business	2
22	Comments on eminent domain	12
23	Adequacy of traffic analysis	15
24	Conflict between EA traffic analysis and 1987 traffic study	10
25	Impacts on auto and freight capacity on 6th/7th	17
26	Comments on congestion and safety	91
27	Comments on Jarrett Walker report	9
28	Need for agency approval of proposed changes and traffic impacts	5
29	Comments on adverse environmental impacts (general)	49

Response #	Comment Topic Area	No. of Comments on Topic
30	Comments on land and property values, economy	19
31	Definition of high capacity transit	1
32	Adequacy of mitigation discussion	17
33	Inconsistency with region's long range plans	30
34	Concern that LTD supporters receive special considerations	4
35	Admonition to improve regular bus service instead of implementing BRT	29
36	Sufficiency of existing bus service	57
37	Comments on projected cost / ridership	63
38	Comments regarding the population EmX serves	17
39	Assertion that EmX is not the right solution	50
40	Assertion that public transit should be self-supporting	9
41	Question regarding route roadways	1
42	Comments about travel time	3
43	Comments about park and ride lots	4
44	Comment about running in mixed traffic	1
45	Use of public money to promote project / silence the opposition	6
		1,569

The greatest number of comments fell into five categories (percentages are approximate):

#1 - Expression of opposition to or support for the WEEE project (13 percent)

#6 - Concerns about project costs (7 percent)

#4 – Expressing an opinion about public policy issues that are not NEPA issues (6 percent)

#26 – Concerns about congestion and / or safety (5 percent)

#11 – Adequacy of analysis (generally) (5 percent)

Interagency Coordination

When the project was initiated in 2007, FTA and LTD anticipated that it would require an environmental impact statement (EIS). At that time, as required by applicable federal law, LTD prepared a draft Coordination Plan to guide LTD's project team through the various public and agency involvement activities for the project. Outlining activities from the scoping phase to the NEPA determination, the plan was designed to solicit early and continued feedback from stakeholder groups and ensure that the input was incorporated into the decision-making process. It also specified how FTA and LTD would coordinate with other agencies and the public.

LTD and FTA initially invited 30 local, state, and federal agencies and tribes to participate in the project's environmental review. The U.S. Army Corps of Engineers agreed to a Cooperating Agency role, and 10

other agencies and the Confederated Tribes of the Grand Ronde agreed to a Participating Agency role. During the project's Scoping and Alternatives Development and Refinement phases, the participating agencies and tribe attended workshops, field tours, and issue-specific meetings, and reviewed project-related materials and analyses. In March 2008, after review and comments by the agencies and the tribe, LTD revised and published a modified Coordination Plan (see EA Appendix 7-2). This modified plan guided agency coordination until May 2011, when FTA determined the project's environmental review under NEPA could proceed through an EA rather than an EIS (EA Appendix 7-4). The Corps of Engineers concurred with the decision to proceed with an EA. FTA notified the agencies and the tribe of the change to an EA and invited their continued participation.

Chapter 11 of the EA lists the agencies who received an electronic Notice of Availability (NOA) for the EA. The list includes three tribes, 16 federal agencies, 15 state agencies or agency divisions, and 22 local agencies or agency divisions.

NOTE: Correction and Clarification of the EA

Following the EA's publication, FTA and LTD realized that Chapter 3.11 (Biological Resources and Endangered Species) contains erroneous statements. The EA stated that the project will have no effect on fish or habitat protected by the Endangered Species Act (ESA). This statement incorrectly reflects both the supporting analysis and FTA's finding. The project *may affect* ESA-protected fish and habitat, but given the mitigation measures described in the EA and reiterated and strengthened in this FONSI, it is *not likely to adversely affect* the fish and habitat. This is the position taken in FTA's consultations with the US Fish and Wildlife Service (FWS) and with the National Marine Fisheries Service (NMFS) (see Appendix D for FTA's "not likely to adversely affect" findings sent to FWS and NMFS in letters dated May 22, 2012, and for FWS's concurrence received on August 16, 2012)). It is also consistent with FTA's decision to withdraw its request for concurrence from NMFS and let the project proceed under the SLOPES IV Programmatic Biological Opinion, as communicated to NMFS on July 3, 2012 (Appendix D). FTA's ESA findings are explained in more detail elsewhere in this FONSI.

Environmental Effects and Mitigation Measures to Minimize Harm

The EA describes the project, the likely impacts, and potential mitigation measures to avoid or reduce those impacts. Appendix C to this FONSI describes the mitigation measures that FTA requires of LTD as conditions of FTA's finding. These mitigation commitments are based on the mitigation measures identified in the EA. Some of them are also necessary to satisfy other legal requirements (e.g., state or local permitting requirements, or requirements under other Federal statutes). FTA finds that with the accomplishment of these mitigation commitments, LTD will have taken all reasonable, prudent, and feasible means to avoid or minimize any potential significant impacts from the proposed action.

Determinations and Findings

National Environmental Policy Act (NEPA) Finding

FTA served as the lead agency under NEPA for the project. LTD prepared the EA in compliance with NEPA, 42 U.S.C. § 4332 *et. seq.*, and with FTA's regulations, 23 CFR Part 771. FTA has independently evaluated the adequacy of the EA.

After carefully reviewing the EA and supporting documents, including comments from the public and agencies and the responses made to those comments, FTA finds under 23 C.F.R. § 771.121 that the proposed project, with the mitigation that is required herein, will have no significant adverse impact on the environment. The record provides sufficient evidence and analysis for determining that an Environmental Impact Statement is not required.

The WEEE project will have short-term impacts during construction on residents and businesses along the alignment. Construction may cause temporary interruption in access to homes and businesses, as well as noise, dust, and fumes during construction. LTD has committed to providing public outreach to coordinate with businesses and residents to minimize construction disruptions, and to maintain access for all properties impacted by construction (as described in the EA in Section 3.17: Construction Activities and Consequences). A plan for public outreach, including strategies and responsibilities during construction, will be developed by LTD before construction begins. Additionally, LTD will comply with all federal, state and local requirements for construction projects and will implement control measures during construction. These measures include among others the use of mufflers, compliance with federal noise level standards, dust suppression measures, construction staging and traffic control plans to minimize disruption to traffic and bicycle/pedestrian movements, and adequate public notice and coordination with area residents and businesses of the construction progress and temporary closures.

Environmental Justice Findings

Executive Order 12898 provides that “each federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations.” The Department of Transportation (DOT) Order 5610.2(a): Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (2012) similarly requires FTA to explicitly consider human health and environmental effects related to transit projects that may have a disproportionately high and adverse effect on minority and low-income populations. A disproportionately high and adverse effect on human health or environment is defined as an effect predominantly borne by, or would be suffered by, low-income populations or minority populations (collectively “environmental justice populations”) and that is appreciably more severe and greater in magnitude than adverse effects suffered by a non-environmental justice population. The DOT Order specifically requires FTA consider mitigation and enhancement measures, as well as project benefits, in making determinations regarding disproportionately high and adverse effects on minority and low-income populations. The Order also directs FTA to implement procedures to provide “meaningful opportunities for public involvement” by members of these populations during project planning and development.

LTD analyzed environmental justice as part of the EA. The analysis indicates that in the long term, the proposed project will likely have beneficial effects on minority and low-income populations by providing improved access opportunities to transit, with shorter headways and access to a regional connected BRT system. Any temporary adverse effects on minority and low-income populations will not be appreciably more severe or greater in magnitude than effects experienced by other populations. Based on that analysis, **FTA finds that the construction and operation of the West Eugene EmX Extension Project will**

not result in disproportionately high and adverse effects on low-income or minority populations, and that meaningful opportunities for public involvement by members of these populations were provided during project planning and development.

Air Quality Findings

The U.S. Environmental Protection Agency (EPA) has developed National Ambient Air Quality Standards (NAAQS) for each of six criteria air pollutants to protect the public health and welfare. The NAAQS specify maximum concentrations for carbon monoxide (CO), particulate matter less than 2.5 microns in diameter (PM_{2.5}), particulate matter less than 10 microns in diameter (PM₁₀), ozone (O₃), sulfur dioxide (SO₂), lead, and nitrogen dioxide (NO₂).

In addition to using NAAQS to regulate the criteria air pollutants, EPA also regulates air toxics. The Clean Air Act identified 188 air toxics, also known as hazardous pollutants. EPA has assessed this list of toxics and identified a group of 21 as mobile source air toxics (MSATs).

Under the 1990 federal Clean Air Act Amendments (CAAA), no federal agency or department may support or approve any activity that does not conform to the State Implementation Plan (SIP) (42 U.S.C. § 7506 (c)). Federal agencies must determine, under EPA's transportation conformity regulations (40 C.F.R. §§ 93.100 to 93.128), that the project will not cause or contribute to any new violations of the NAAQS, increase the frequency or severity of any existing violations or delay the timely attainment of the NAAQS. Lane County is not in attainment for the PM₁₀ NAAQS; it is a maintenance area for CO.

The project is included in the Lane Council of Governments 2011-2035 Regional Transportation Plan (RTP), adopted December 8, 2011, and is identified as EmX project number 1115.

The LPA will reduce regional vehicle miles traveled (VMT) and regional air pollution emissions compared with the No-Build Alternative. While traffic volumes are predicted to increase by 2031, that increase is expected to be offset by reductions in individual vehicle emissions resulting from technology improvements over the same period.

The project will not increase the frequency of or severity of any existing violation of the CO or PM standards, create a new violation of CO or PM standards (or any other NAAQS), or delay timely attainment of the CO or PM NAAQS. Emissions of MSATs are expected to decline as a result of the WEEE project's emphasis upon encouraging transit and non-motorized travel modes. Therefore, this project meets the transportation conformity requirements and no additional air quality mitigation measures are required. **FTA finds that the WEEE project conforms with the SIP and meets all requirements of the Clean Air Act.**

Section 106 Compliance

Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires the review of federally assisted projects for impacts to districts, sites, buildings, structures, and objects which are listed in, or eligible to be listed in, the National Register of Historic Places (NRHP). Federal agencies must coordinate with the State Historic Preservation Office (SHPO) and with potentially affected tribes to make this

determination. The Advisory Council on Historic Preservation has established procedures for the protection of historic and cultural properties in, or eligible for, the NRHP (36 C.F.R. Part 800).

LTD identified 90 historic resources in the project's study area, of which 57 were in an area of potential project effects. The analysis found that the project is likely to have an effect, but not an adverse effect, on five of the historic properties and no effect on the other 52 historic resources. The project is not anticipated to have any effect on archaeological or cultural resources.

The SHPO and federally recognized Native American Indian Tribes (Confederated Tribes of the Grand Ronde, Confederated Tribes of the Siletz Indians, and Confederated Tribes of the Warm Springs) have been contacted as part of the consultation and review process under Section 106 of the NHPA. The SHPO has reviewed the technical report of the historic, archaeological, and cultural resources assessment. On August 25, 2011, the SHPO formally concurred with the determination of eligibility and findings of effect for above-ground historic resources (EA Appendix 3-6). On September 1, 2011, the SHPO concurred that the project is likely to have no effect on any known archaeological or cultural resources (EA Appendix 3-5).

Based on the cultural resources analysis and consultation with the SHPO and Indian tribes, **FTA finds that with the implementation of mitigation commitments identified in Appendix C, the project will have No Adverse Effect on historic resources, specifically including the properties at 849 West 6th Avenue, 931 West 7th Avenue, 710 Polk Street, 630 Garfield Street, and 888 Garfield Street. FTA finds that the Section 106 coordination and consultation requirements for this project have been fulfilled.**

Section 4(f) and Section 6(f) Findings

Section 4(f) of the United States Department of Transportation Act of 1966 declares a national policy that a special effort should be made to preserve the natural beauty of the countryside; public park and recreation lands; wildlife and waterfowl refuges; and historic sites. To that end, the Secretary of Transportation may not approve transportation projects that require more than a *de minimis* use of publicly owned land of a public park, recreation area, or wildlife or waterfowl refuge of national, state or local significance, or land of an historic site of national, state or local significance (as determined by the officials having jurisdiction over the park, area, or refuge or site) unless a determination is made that: (i) there is no feasible and prudent alternative to the use of the land; and (ii) the action includes all possible planning to minimize harm to the property resulting from such use.

Section 6(f) of the Land and Water Conservation Fund (LWCF) Act applies to outdoor public recreation resources that were acquired or developed by state or local agencies with LWCF funds. It prohibits the conversion of such property to a non-recreational purpose without the approval of the Department of the Interior's National Park Service (NPS). The NPS must ensure that the project provides replacement lands of equal value, location, and usefulness. The project does not use any Section 6(f) property.

There are two park resources within 100 feet of the project alignment: Washington/Jefferson Park and the Amazon Channel. All other park and open space resources are at a greater distance and sufficiently screened from any potential adverse project effects.

Washington / Jefferson Park

The project improvements along West 7th Avenue where it crosses the southern edge of the park will move the existing travel lane approximately 12 feet to the north, requiring roadway widening onto an approximately 12-foot-wide strip of the park space and the likely removal of the adjacent trees. (LTD will replace the street trees.) The park is located on Oregon Dept. of Transportation (ODOT)-owned right-of-way (ROW) for the Interstate 105 freeway. The ODOT property is part of an existing transportation facility. ODOT allows the City to operate the park on the ROW under a special agreement that reserves ODOT's right to use the land for transportation purposes. FTA has determined that the use of this land for the project does not trigger Section 4(f) because the property's primary transportation purpose renders Section 4(f) inapplicable. On June 25, 2012, the City of Eugene (the agency with jurisdiction over the park) concurred with this determination (see EA Appendix 3-8).

Amazon Corridor (recreational area)

The section of the Amazon Corridor within 100 feet of the project is located east of Sam Reynolds Street where the Amazon Channel goes under West 11th Avenue. Here, the existing Fern Ridge Multi-Use Path on the north side of the Channel and under the bridge is unshielded from West 11th Avenue traffic for approximately 1,000 feet, and EmX buses will be visible to path users. However, no adverse effects are anticipated as BRT operations are not expected to significantly change environmental conditions compared to typical traffic use on West 11th Avenue. Existing ROW is adequate to accommodate widening of the West 11th Avenue crossing at Amazon Channel. The bridge will span over park property and not substantially impair any critical features or attributes of the property, and thus not constitute a use under Section 4(f).

The project includes two new bicycle and pedestrian path crossings of the Amazon Channel to enhance bike and pedestrian connectivity from West 11th Avenue and EmX stations to the Fern Ridge Multi-Use Path and Amazon Corridor. Because the new crossings will be entirely within platted street ROW, and no additional ROW will be needed, Section 4(f) does not apply to them. LTD will implement construction best management practices and alternative access provisions to minimize disruption to users of the recreational resources.

As detailed in EA Section 3.7 and with the concurrence of the SHPO (on August 25, 2011), FTA determined that project activities will have no adverse effect on historic properties (including Amazon Channel). It accordingly advised the SHPO on March 28, 2012 of its intention to rely on the no-adverse-effect finding under Section 106 to satisfy the requirements for a *de minimis* use finding under Section 4(f) (Appendix D). Section 4(f) allows *de minimis* uses of historic properties.

No known archaeological resources will be affected by the LPA. However, the potential for construction activities to inadvertently affect historic resources or buried archaeological resources always exists. In the unlikely event that this should occur, regulations and mitigations measures are summarized in EA Section 3.7.

No wildlife or waterfowl refuges are present in the project study area.

FTA finds, in accordance with 23 CFR Part 774, that the proposed project will not use any publicly owned parks and recreational resources or lands funded by LWCF Section 6(f), and it will have only a *de minimis* impact on historic sites protected by Section 106 of the National Historic Preservation Act. The project therefore complies with the requirements of Section 4(f) and Section 6(f).

Transportation, Traffic and Parking

Project traffic and transportation impacts are described in the EA and, in more detail, in Appendix 4 to the EA. The analyses considered motor vehicle and freight transportation (regional and local operations, access, safety and circulation), pedestrian and bicycle transportation, emergency services access, and on-street and off-street parking.

The EA used reasonable and generally accepted methods of assessing likely impacts in the relevant areas. It disclosed impacts and discussed ways of mitigating them. While forecasting transportation effects is not an exact science, the EA (and the analyses that preceded it) gives a reasonable basis for decision makers to determine whether there are likely to be significant adverse impacts and for comparing the likely effects of the LPA and the No-Build Alternative.

FTA recognizes that the LPA will convert some general-purpose roadway to BRT use (one lane on West 7th Avenue between Charnelton and Washington Streets and one lane on West 6th Avenue generally between Blair Boulevard and Chambers Street). Since this conversion affects part of the National Highway System, it will require approval from the Federal Highway Administration and Oregon Dept. of Transportation. That approval will be sought when the project has more design detail.

With the traffic- and parking-related mitigation commitments described in Appendix C, FTA finds that the local transportation system is adequate to support safe and efficient operations of the proposed EmX project, and that the project will not significantly disrupt the non-transit components of the local transportation system.

Land Acquisitions, Displacements and Relocations of Existing Uses

The project will primarily use property that is already public right-of-way (ROW) owned by the City of Eugene and the State of Oregon. This minimizes acquisition of private property. Acquisition of about 2.6 acres of land will still be necessary, the impacts of which are discussed in EA Section 3.2 and Appendix 3-2.

The property analysis considered acquisition related impacts to real estate and businesses. It identified potential effects to 118 properties (under approximately 100 to 105 different ownerships) along the project alignment. The LPA will not acquire any full, privately owned parcels. It will require less than 0.02 acres from 70 percent (83) of the 118 affected properties. The project also affects certain property that appears to be privately owned but is actually public right-of-way being used by the abutting private landowner for landscaping, signage, storage or other purposes. The project might displace a single residential unit, which is a non-conforming unit in an abandoned motel structure.

Project property acquisitions could affect parking for 28 properties. LTD will mitigate parking impacts as much as possible by reducing the width of sidewalk improvements, reconfiguring parking lots, and constructing retaining walls on properties with significant slopes. It will continue to refine alignment

design details in conjunction with affected property and business owners to further reduce parking impacts.

Even with mitigation, the loss of off-street parking could lead to the displacement of two retail businesses: a small specialty grocery and an adult store. Although the observed off-street parking requirements for both businesses appear low, the properties might not remain viable sites for these two specific businesses given the business types and limited nearby on-street parking. However, the property acquisition will not render these sites out of compliance with parking requirements or other building/development requirements for commercial or retail uses.

The project will have meaningful but less serious effects on other businesses. Five other properties are potentially subject to project effects of note (e.g., a security fence and exterior stairway will require reconstruction). The uses on these five properties will not be displaced. The potential effects on each of these properties and possible mitigation measures are summarized in Table 3.2 of the EA.

Other potential property impacts include issues related to billboards, business signs, landscaping, bioswales, and access management medians. Many of the business properties along the project alignment have signage and trees which will be impacted by the project. LTD will work with the City and business owners to relocate signs and replace trees.

Nine properties will be affected by access closures or modifications; six of them currently have more than one driveway and the three others will remain usable after modification. As project design advances, LTD will investigate modifying station designs to avoid or minimize access impacts.

In all cases, the acquisition of real property interests will fully comply with the Uniform Relocation Assistance and Real Property Acquisition Policies Act and the Fifth Amendment of the United States Constitution. All affected owners will be provided notification of the acquiring agency's intent to acquire an interest in their property, including a written letter of just compensation specifically describing those property interests. Parking impacts will be avoided and minimized as much as possible as the project proceeds. For temporary construction impacts, LTD will coordinate with property owners regarding any required construction easements, provide temporary access during normal business hours, and provide adequate detours and associated signage before construction starts.

With the acquisition and displacement related mitigation commitments described in Appendix C, FTA finds that the project meets requirements related to land acquisitions, displacements and relocations of existing uses and that there will be no significant adverse impacts related to property acquisition.

Noise and Vibration

A noise and vibration impact assessment followed the procedures set forth in FTA's Transit Noise and Vibration Impact Assessment Guidance Manual (May 2006) and in ODOT's Traffic Noise Manual (2011).

Operational Noise and Vibration Impacts

The project's predicted noise effects, when added to existing conditions, could create what FTA's noise model calculates to be "moderate impacts" at up to 11 residences in two structures. However, the project will add less than 2 decibels, an increase that most people cannot perceive. FTA noise guidance

requires consideration of specified factors to determine whether a project must mitigate noise impacts. In this case, because the calculated impacts are moderate and the predicted noise increase is so slight as to be imperceptible to most people, FTA will not require mitigation.

Also, it is possible that the LPA noise levels at a recently built 25-unit apartment building in the downtown area may exceed HUD noise criteria. Exceeding this criterion is unlikely because most newer buildings effectively block the amount of noise that is forecast. However, LTD will undertake additional testing at this location to assess its existing noise-insulating properties and refine the predicted forecast of noise impacts. For residential living and sleeping areas where noise criteria levels are exceeded, sound insulation will be considered as potential mitigation. EA Section 3.4 provides additional details.

Construction Noise and Vibration Impacts

Heavy equipment needed to build the project will create noise and vibration. Construction will temporarily increase noise levels. Noise-generating haul truck and delivery truck volumes and times of travel will vary depending on the specific site activities occurring at any one time. The highest noise levels will occur during the heaviest construction, such as demolition, paving, jackhammering and hauling. Noise levels will only be slightly above the ambient levels during minor construction work, such as finishing work, roadway striping, and system installation.

Specific measures to be employed to mitigate construction noise and vibration impacts will be developed by the final design contractor in the form of a Noise Control Plan. Appendix C specifies the plan's components.

With the noise- and vibration-related mitigation commitments described in Appendix C, FTA concludes that no significant noise and vibration impacts are predicted from the operation and construction of the WEEE project.

Water Quality and Hydrology Findings (including Floodplain Compliance)

A water resources impact assessment evaluated potential effects to stormwater, hydrology and hydraulics, and floodplains. This is necessary under a variety of authorities:

- Executive Order 11988 (Floodplain Management) and U.S. DOT Order 5650.2 (Floodplain Management and Protection) require the protection of floodplains and floodways.
- The Clean Water Act (CWA) requires states to set water quality standards for all contaminants in surface waters, based on the "beneficial" or "designated" uses for the water body, and makes it unlawful for any person to discharge any pollutant from a point source into navigable waters without a permit. It also recognizes the need to address the problems posed by nonpoint source pollution. Among its relevant provisions:
 - Section 303 (d) requires states to develop a list of waters that do not meet water quality standards, even after point sources of pollution have installed the minimum required levels of pollution control technology.

- Section 401 (Water Quality Certification) requires applicants for certain federal approvals to obtain a certification that the activity complies with state water quality requirements and standards.
- Section 402 prescribes the process for obtaining a National Pollutant Discharge Elimination System (NPDES) permit. EPA requires NPDES permits for construction activities as well as for municipalities of certain size that discharge stormwater into waterways. In Oregon, DEQ enforces NPDES permits and authorizes Section 401 Certifications. An NPDES General Construction 1200-C Stormwater Permit is mandatory for construction activities on sites covering more than 1 acre. This permit requires a Temporary Erosion and Sediment Control Plan (TESCP).
- Section 404 regulates the discharge of dredged and fill material into waters of the United States, including wetlands. Every effort must be made to minimize impacts to the maximum extent practical. A Section 404 permit is required for any build alternative that involves work within a wetland.

The project is located within the Amazon, Willamette, and Bethel-Danebo drainage basins, and touches the Willow Creek drainage basin near the Commerce Street Terminus. The alignment crosses the Amazon Channel, and a small portion of the project is located within the 100-year floodplain. Much of the area surrounding the LPA is developed; however, building this project could cause new water quality impacts to these drainage basins.

The WEEE project is located in an infiltration-limited area with a shallow water table. The project is not located in a Sole Source Aquifer. There are no designated groundwater recharge areas in the project vicinity. Groundwater will have less potential for recharge under the project than it does now. However, this will not be a significant effect.

Stormwater

The project will add new impervious surfaces, creating a larger amount of runoff (and pollutants) and increasing flow volumes to receiving waters. The LPA will add about 7.3 acres of net new impervious area, a 13.3 percent increase over the existing 54.7 acres. It will also reconstruct 9 acres of existing impervious surface.

At a minimum, the project's water quality treatment facilities will be designed to meet or exceed the standards listed in the Revisions to Standard Local Operating Procedures for Endangered Species to Administer Maintenance or Improvement of Road, Culvert, Bridge and Utility Line Actions Authorized or Carried Out by the U.S. Army Corps of Engineers in Oregon (SLOPES IV) Programmatic Biological Opinion (NMFS No. 2008/04070). These standards also require treatment of runoff from "contributing impervious area (CIA)" (side streets that slope toward the project area). The amount of CIA will be determined during project design. Also, the City of Eugene requires roadway projects to treat runoff from existing surfaces which are reconstructed. The project will thus treat the runoff generated by about 16.3 acres of pavement plus the runoff from CIA.

To mitigate for pollutants generated from new impervious area, the project must meet a number of pollution reduction standards. City of Eugene, ODOT, and Corps of Engineers approvals are required. The

most stringent standards are probably those defined in the SLOPES IV Programmatic Biological Opinion. The exact techniques used to treat stormwater will be determined during final design and permitting and could include vegetated swales, raingardens, stormwater planters, vegetated filter strips, and/or some proprietary facilities like StormFilter™ catch basins and manholes. Selected facilities will be sized to meet the SLOPES IV water quality design standards. Correct design and utilization of selected facilities will mitigate long-term impacts. The project will also be designed to satisfy the requirements for a Section 401 Water Quality Certification. Consistent with the City's stormwater standards and with SLOPES IV's emphasis on the use of low-impact development (LID) facilities, the LPA will not propose the use of dedicated flow control facilities.

Floodplains

New impervious surface in floodplains, if not mitigated, increases pressure on the remaining flood zone. Impacts to the existing floodplains are possible at the following locations:

- Commerce Street Terminus
- North of West 11th Avenue and east of Commerce Street Terminus
- West 11th Avenue, between South Bertelsen Road and Ocean Street
- West 11th Avenue at Amazon Channel crossing
- Two bicycle and pedestrian path crossings of Amazon Channel

Federal and local laws require LTD to mitigate flood zone encroachment so that there will be no rise in flood levels during the occurrence of the base flood. The City of Eugene requires a floodplain development permit for all development within a designated floodplain. During further design stages for this project, LTD will prepare a floodplain analysis to provide information that will be used to mitigate the impacts. The City must approve the proposed mitigation plan.

Construction-Related Impacts to Water Quality

The main sources of construction-related impacts from the project will be roadway expansion and construction of some water quality treatment facilities along the alignment.

To minimize construction-related erosion and sedimentation impacts, LTD's contractor will operate under a NPDES General Construction permit. That permit will include a Temporary Erosion and Sediment Control Plan (TESCP) to protect receiving water quality from construction impacts. The components of the TESCP are described in Appendix C.

With the water resources-related mitigation commitments described in Appendix C, including compliance with city, state, and Corps of Engineers permit requirements, FTA finds that the proposed project will have no significant adverse impacts to stormwater, groundwater or 100-year floodplains or floodways and will satisfy the water quality requirements described above.

Wetlands Findings

The U.S. Department of Transportation seeks to assure the protection, preservation, and enhancement of the nation's wetlands to the fullest extent practicable during the planning, construction, and operation of transportation facilities and projects (DOT Order 5660.1A). This is consistent with Executive

Order 11990, requiring that new construction located in wetlands be avoided unless there is no practicable alternative to the construction and that the proposed action include all practicable measures to minimize harm to wetlands that may result from such construction; and with Section 404 of the Clean Water Act. Under this section, the Corps of Engineers regulates discharges of dredged or fill materials into waters of the United States, including wetlands. The Corps requires that wetland impacts be avoided or minimized to the extent practicable. If the project will require more than 50 cubic yards of fill in total, which is not yet clear, it will also require a permit from the Oregon Department of State Lands (DSL).

As discussed in Section 3.12 of the EA, the project avoids direct impacts to six of the seven wetlands/ waterways in the project area. However, even after undertaking all practicable avoidance measures, it will permanently fill about 0.048 acre of Wetland 15 and could have additional temporary construction impacts. Widening of the West 11th Avenue bridge and building the new bike and pedestrian crossings could also have minor direct impacts below the ordinary high water elevation of Amazon Channel.

The proximity of construction activities could indirectly and slightly impact five wetlands (Wetlands 1, 4, 13a, 14, and 39). There is some potential for sediment transport to wetlands and waterways.

The Corps of Engineers' and DSL's regulatory and permitting standards require LTD to minimize and mitigate potential impacts to wetlands and waterways. Appendix C lists measures that might be required, although specifics will be determined only when more design detail is available. Mitigation required by Corps and DSL permits will likely include some combination of the following:

- Providing compensatory mitigation
- Restoring temporary wetland and waterway impact areas
- Assuring a clear span over waterways at all crossings
- Designing the project to minimize new impervious surface, and especially pollution generating impervious surface, as much as possible
- Minimizing use of riprap associated with the proposed structures
- Incorporating the use of large woody debris in riparian areas
- Removing non-native, invasive plant species from around wetlands and riparian areas
- Planting native trees and shrubs and seeding with native herbaceous mix within the riparian areas
- Enhancing the buffer associated with Wetland 39
- Employing BMPs for construction activities, such as those described in EA Section 3.13.3
- Retaining and/or treating stormwater runoff from impervious surfaces (see EA Section 3.13)

With the wetlands-related mitigation commitments described in Appendix C, including a commitment to comply with permit conditions to be determined, FTA finds that the project satisfies the requirements of DOT Order 5660.1(a), Executive Order 11990, and Section 404 of the Clean Water Act.

Endangered Species Act Findings

The Endangered Species Act (ESA) is intended to protect threatened and endangered species and the ecosystems on which they depend. It requires federal agencies to ensure that any action they authorize, fund, or carry out is not likely to jeopardize the continued existence of any listed species or result in

direct mortality or destruction or adverse modification of critical habitat of listed species. This can require, in turn, consultation with the appropriate agency responsible for the conservation of the affected species. Mitigation may be required to avoid jeopardizing listed species or their habitat.

EA Chapter 3.11 describes the biological resources that the LPA could affect. Briefly, much of the project is located within a highly urbanized area that does not provide substantial habitat features. The LPA crosses the Amazon Channel, and Willow Creek is west of the alignment. The Willamette River is more than one-half mile from the LPA. Amazon and Willow Creeks do not connect directly to the Willamette River. Amazon Channel does not support listed aquatic species. The Amazon flows into the Long Tom River, which has a Federal Register-listed ESA fish barrier located in Monroe. The barrier prevents upstream passage for anadromous species from the Willamette River into the Long Tom River and further upstream.

Amazon Channel has been historically manipulated and disturbed. A paved bike and pedestrian path extends along most of its length within the study area. Still, the wetland, riparian, and aquatic habitats are occupied by numerous plant and wildlife species.

Extensive rare plant surveys were conducted during the 2008 and 2009 growing seasons. Designated critical habitat for Fender's blue butterfly (*Icaricia icarioides fenderi*), Willamette daisy (*Erigeron decumbens* var. *decumbens*), and Kincaid's lupine (*Lupinus sulphureus* ssp. *kincaidii*) were found, but none within the LPA's area of potential effect.

Only one listed wildlife species is known to occur in the study area: Fender's blue butterfly. Its habitat is not near the LPA alignment.

Federally listed fish species that occur within the Upper Willamette River include Upper Willamette River Evolutionarily Significant Unit Chinook salmon (*Oncorhynchus tshawytscha*), Upper Willamette River Distinct Population Segment steelhead (*Oncorhynchus mykiss*), bull trout (*Salvelinus confluentus*), and Oregon chub (*Oregonichthys crameri*). None of these has been documented in study area waterways. Critical habitat is designated for Chinook salmon and bull trout in the Willamette River. Critical habitat has been designated for Oregon chub in creeks and ponds off of the Middle Fork Willamette River, but not in the project area. Critical habitat has not been designated for steelhead in the Upper Willamette River south of the Calapooia River confluence.

Potential impacts to biological resources are discussed by category below.

Habitat for Terrestrial Wildlife

No direct impacts to designated critical habitat are anticipated since none exists along the project alignment. If the project discharges stormwater west of the LPA alignment, minor alterations to seasonal hydrology could occur in designated critical habitat for Fender's blue butterfly and Willamette daisy. These minor alterations of the hydrologic regime would not adversely impact these populations.

Federal and State Listed Terrestrial Wildlife

No impacts to federal or state listed wildlife are anticipated. Development of riparian crossings could result in impacts to the non-listed (a federal “species of concern”) Northern Pacific pond turtle. Minor localized impacts to Northern Pacific pond turtles could occur at bridge and bike and pedestrian crossings, but direct mortality is unlikely.

Federal and State Listed Plants

Extensive rare plant surveys within the project study area revealed no federal or state listed plant species in the path of the alignment or likely to be affected by the project.

Federal and State Listed Aquatic Wildlife

The EA reported in Section 3.11.2.2.4 that the project would have no effect on listed fish or designated habitat. That was incorrect. FTA had found (and requested concurrence with its finding) that the project might affect, but would not likely adversely affect, listed fish species and designated habitat. After FTA had additional discussions with NMFS and the Corps regarding potential effects to listed fish and designated habitat, FTA and the Corps determined that the project would likely qualify for regulation under the (Revised) Standard Local Operating Procedures for Endangered Species to Administer Maintenance or Improvement of Road, Culvert, Bridge and Utility Line Actions Authorized or Carried Out by the U.S. Army Corps of Engineers in Oregon (SLOPES IV) Programmatic Biological Opinion (NMFS No. 2008/04070). More detail supporting the determination is provided below.

The project will affect stormwater, but not enough to have adverse effects on listed fish or designated habitat in the Upper Willamette River. It will add 0.91 acres of net new impervious surface to 17.1 acres of existing impervious surface that currently drains to the Upper Willamette River. It will increase the amount of runoff from impervious surfaces to the Willamette River by only 0.03 percent. Runoff from the study area could reach the Willamette River via the stormwater system in downtown Eugene. If the runoff were not controlled or treated, the increase in impervious surface proposed for the project could affect the four threatened and endangered fish species (Chinook salmon, steelhead, bull trout, and chub) that occur in the Willamette River near the study area. However, the project design will incorporate a number of protective measures that will eliminate effects to fish. Runoff from the project will be required to satisfy the terms and conditions of the SLOPES IV Programmatic Biological Opinion. It will also meet the City’s and ODOT’s stormwater design standards, and Department of Environmental Quality water quality standards. Significantly, the project will not only treat runoff from new impervious surface, but also treat runoff from existing impervious surface, which now goes untreated to a City facility before being conveyed (untreated) to the Willamette River.

Short-term construction related-impacts to riparian habitat will occur at the roadway, bike and pedestrian crossings of the Amazon Channel. The work could increase the potential for sediment transport to wetlands or waterways and might temporarily displace wildlife. Impacts to Northern Pacific pond turtles could include temporary displacement from the vicinity or disruption of nesting sites. In addition, grading and other road construction activities could cause small temporary increases in waterway turbidity and sedimentation, and temporary bank instability could result from bank

manipulation and removal and subsequent planting of vegetation (until new plantings are established). None of these effects will be significant.

To minimize impacts to biological resources, LTD will perform the mitigation described in Appendix C, including commitments to:

- Assure a clear span over the waterway at all crossings
- Comply with ODFW and NMFS criteria for maintaining an active channel at new or modified waterway crossings
- In areas where disturbance of riparian vegetation, soils, streambanks, or stream channel occurs, clean up and restore those features to pre-existing conditions or better; remove invasive species and plant with native vegetation
- Select and operate heavy equipment to minimize adverse effects on the environment, per SLOPES IV guidance
- Design the project to minimize new pollution-generating impervious surface as much as possible
- Design and install habitat-friendly landscaping
- Minimize the use of riprap
- Incorporate large woody debris (including downed wood and standing snags) in riparian areas
- Remove non-native, invasive plant species, such as Himalayan blackberry and reed canarygrass
- Plant native trees and shrubs and seed with native herbaceous mix within the riparian areas
- Replace removed street trees (see EA Section 3.16)
- Comply with ODFW in-water work period for the Amazon crossings (July 15 thru October 15)
- Avoid tree removal between March 1 and September 1 to avoid impacts to migratory birds
- Enhance the wetland buffer associated with the protected wetland north of the Commerce Street station
- Employ erosion and pollution control plans to minimize water quality impacts during construction
- Install stormwater conveyance and treatment systems consistent with ODOT and DEQ water quality requirements (see EA Section 3.13)
- Coordinate with the Corps to assure that the project implements any additional requirements needed to satisfy SLOPES IV

With the mitigation measures described in Appendix C, FTA finds the project may affect but is not likely to adversely affect threatened and endangered species under the jurisdiction of the U.S. Fish and Wildlife Service (bull trout, Oregon chub) and designated critical habitat for both species (letter dated May 21, 2012) (Appendix D). The U.S. Fish and Wildlife Service concurred with this determination on August 16, 2012 (Appendix D).

FTA made a similar determination with respect to species under the jurisdiction of the National Marine Fisheries Service (NMFS) (Chinook salmon, steelhead) and requested NMFS's concurrence (letter dated May 21, 2012). However, after discussions with NMFS and the Corps, FTA withdrew that request for concurrence and advised NMFS that the project will satisfy its ESA requirements by complying with the SLOPES-IV Programmatic Biological Opinion (letter dated July 3, 2012) (Appendix

D). As stated in that letter, the Corps will become the lead federal agency for purposes of further ESA consultation in conjunction with the stormwater and wetlands permitting.

Accordingly, with the mitigation commitments described in Appendix C, including the project's commitment to meet the terms and conditions required by SLOPES IV, FTA finds that the project meets the substantive and procedural requirements of the Endangered Species Act.

Magnuson-Stevens Act Finding

The Magnuson-Stevens Fishery Conservation and Management Act (MSA) requires federal agencies to consult with NMFS regarding actions or proposed actions that may "adversely affect" Essential Fish Habitat (EFH) as designated under MSA (16 U.S.C. § 1855 (b)(2)).

The Upper Willamette River contains some areas identified as EFH for Chinook and coho salmon (*Oncorhynchus kisutch*), although coho salmon are not documented to occur south of Mary's River. The Willamette River is more than one-half mile from the LPA. Amazon and Willow Creeks do not connect directly to the Willamette River. Amazon Channel does not support listed aquatic species. The Amazon flows into the Long Tom River, which has a Federal Register-listed ESA fish barrier located in Monroe. The barrier prevents upstream passage for anadromous species from the Willamette River into the Long Tom River and further upstream.

The SLOPES IV Programmatic Biological Opinion applies to MSA requirements as well as ESA requirements.

Accordingly, with the mitigation commitments described in Appendix C, including the project's commitment to meet the terms and conditions required by SLOPES IV, FTA finds that the project satisfies the requirements of MSA.

Farmland Findings

There are no prime farmlands located within the project's affected environment.

FTA finds that the proposed project will have no adverse effect on prime farmlands subject to the Farmlands Protection Policy Act (FPPA) of 1981.

Environmental Finding

The EA is hereby incorporated by reference in this Finding of No Significant Impact (FONSI). In addition, the following documents are attached and incorporated by reference as part of this FONSI:

- Appendix A: Advertisements and Notices
- Appendix B: Comments and Responses
- Appendix C: Mitigation Commitments
- Appendix D: Agency Communications

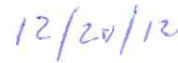
Having carefully reviewed the analysis and conclusions in the EA and its associated supporting documents, the Federal Transit Administration finds pursuant to 23 C.F.R. § 771.121 that there are no likely significant adverse impacts on the environment associated with the development and operation of the proposed West Eugene EmX Extension project.



R.F. Krochalis

Regional Administrator

Federal Transit Administration, Region X



Date

Appendices

Appendix A: Advertisements and Notices

Appendix A: Advertisements and Notices

The WEEE EA was made available for public review and comment for 45 days from July 16, 2012 through September 5, 2012. Copies of advertisements and notices published by LTD to inform interested public and agencies about the public review period are included in this appendix.

The Register-Guard legal advertisement – Monday, July 16, 2012

Press Release issued Monday, July 16, 2012

Notice of Availability Email to Participating Agencies and Tribes List sent Monday, July 16, 2012

Notice of Availability Email to Interested Parties List sent Monday, July 16, 2012

Notice of Availability Email to All LTD Employees sent Monday, July 16, 2012

LTD E-Newsletter emailed to entire LTD interested parties list Monday, July 16, 2012

The Register-Guard advertisement published Monday, July 16, 2012 [English / Spanish]

The Register-Guard advertisement published Wednesday, July 18, 2012 [English / Spanish]

Notice of Availability Postcard mailed to owners and occupants of properties located within ½ mile of the proposed project on Thursday, July 19, 2012

Eugene Weekly advertisement published Thursday, July 19, 2012 [English / Spanish]

Springfield Times advertisement published Friday, July 20, 2012 [English / Spanish]

Eugene Weekly advertisement published Thursday, July 26, 2012 [English / Spanish]

Springfield Times advertisement published Friday, July 27, 2012 [English / Spanish]

GUARD PUBLISHING COMPANY

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EUGENE, OREGON 97408

PHONE (541) 485-1234

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Legal Notice Advertising

LANE TRANSIT DISTRICT
KELLY PERRON
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SPRINGFIELD, OR 97475-0470

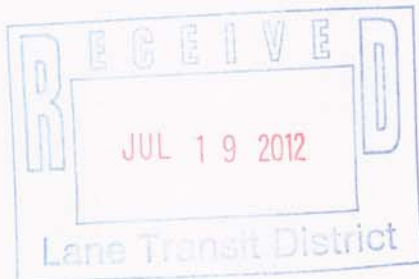
#A-Kelly

AFFIDAVIT OF PUBLICATION

STATE OF OREGON, }
COUNTY OF LANE, } ss.

I, **Wendy Raz**, being first duly affirmed, depose and say that I am the Advertising Manager, or his principal clerk, of The Register-Guard, a newspaper of general circulation as defined in ORS 193.010 and 193.020; published at Eugene in the aforesaid county and state; that the **Public Notice** printed copy of which is hereto annexed, is publishing in the entire issue of said newspaper for **one** successive and consecutive **Day(s)** in the following issues:

July 16, 2012



NOTICE OF Availability West Eugene EmX Extension Environmental Assessment
The Environmental Assessment (EA) for the proposed West Eugene EmX Extension will be available for public review from Monday, July 16, through Wednesday, August 29, 2012. The EA identifies the potential beneficial and adverse environmental, social, and economic effects of the proposed West Eugene EmX Extension.

The public may review the EA document online at weemx.ltd.org, or view project documents at the Lane Transit District (LTD) Administration Office at 3500 E. 17th Avenue in Eugene, the LTD Customer Service Center at 1080 Willamette Street in Eugene, the Eugene Public Library at 100 West 10th Avenue in Eugene, and the Springfield Public Library at 225 Fifth Street in Springfield. Copies of the EA may be purchased by contacting LTD at 541-682-6100 or e-mail we.emx@ltd.org.

Comments on the EA content or conclusions must be submitted in writing no later than 5 p.m. on Wednesday, August 29, 2012, via e-mail at we.emx@ltd.org or by mail to Lane Transit District, P.O. Box 7070, Springfield, OR 97475. Comment letters should contain "EA Comments" in the subject line.

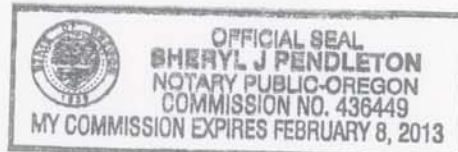
No. 5382502 - July 16, 2012

Wendy Raz

Subscribed and affirmed to before me this July 16, 2012

Sheryl J Pendleton

Notary Public of Oregon



Account #: 1000160

INVOICE 5382502

Case: Proposed West Eugene EmX EA

Ad Price: \$87.50

PERRON Kelly

From: PERRON Kelly on behalf of VOBORA Andy
Sent: Monday, July 16, 2012 2:57 PM
Subject: PRESS RELEASE: West Eugene EmX Extension Environmental Assessment Is Available for Public Review
Attachments: WEEE- Notice of Availabilitydocx.pdf

SENT VIA E-MAIL

FOR IMMEDIATE RELEASE

*Andy Vobora 541-682-6181
541-501-9398*

***West Eugene EmX Extension Environmental
Assessment Is Available for Public Review***

*Lisa VanWinkle 541-682-6212
541-335-9351*

Lane Transit District (LTD) announces that the Environmental Assessment (EA) for the proposed West Eugene EmX Extension is available for public review now through Wednesday, August 29, 2012. The EA identifies the potential beneficial and adverse environmental, social, and economic effects of the proposed West Eugene EmX Extension project. This federal public disclosure document was prepared by technical experts and LTD in cooperation with the Federal Transit Administration (FTA) as required by the National Environmental Policy Act (NEPA).

Two public drop-in sessions will be held on Wednesday, July 25, and Tuesday, August 7, 2012. Members of the West Eugene EmX Extension team will be on hand to explain the content of the EA and to answer project questions. Project staff will be available from 12 p.m. to 7 p.m. at the LTD Next Stop Center, 1099 Olive Street, in Eugene. The Center is wheelchair accessible and alternative formats of printed material and/or a sign language interpreter will be made available with 48 hours' notice. For more information, call 541-682-6100 (voice) or 7-1-1 (TTY).

Those interested may review the EA document online at weemx.ltd.org, or view print or electronic copies of the project document at the Eugene Public Library at 100 West 10th Avenue in Eugene, the Springfield Public Library at 225 Fifth Street in Springfield, the LTD Administration Office at 3500 East 17th Avenue in Eugene, and at the LTD Customer Service Center at 1080 Willamette Street in Eugene. Print and electronic copies of the EA are available for purchase upon request by contacting LTD at 541-682-6100 or by e-mailing we.emx@ltd.org.

Comments on the content of the EA must be submitted in writing no later than 5 p.m. on Wednesday, August 29, 2012, via e-mail to we.emx@ltd, or U.S. mail to Lane Transit District, P.O. Box 7070, Springfield, OR 97475. Comment letters should contain "EA Comments" in the subject line.

Visit weemx.ltd.org to learn more about the West Eugene EmX Extension project.

PERRON Kelly

From: PERRON Kelly
Sent: Friday, September 14, 2012 3:45 PM
To: PERRON Kelly
Subject: FW: West Eugene EmX Extension Environmental Assessment Is Available for Public Review

BCC: 'jfowler@achp.gov'; 'Adsundberg@bpa.gov'; 'Burke.alison@epa.gov'; 'reichgott.christine@epa.gov'; 'mark.eberlein@dhs.gov'; 'execsecretariat.fhwa@fhwa.dot.gov'; 'hdaor@dot.gov'; 'Thomas.Radmilovich@dot.gov'; 'daniel.drais@dot.gov'; 'daniel.drais@dot.gov'; 'Rick.Krochalis@dot.gov'; 'Thomas.Radmilovich@dot.gov'; 'Amy.Changchien@dot.gov'; 'Maurice.Foushee@dot.gov'; 'ben.meyer@noaa.gov'; 'clayton.hawkes@noaa.gov'; 'jharrison@nwcouncil.org'; 'Benny.A.Dean@usace.army.mil'; 'Emily.duncan@hq.doe.gov'; 'AskNEPA@hq.doe.gov'; 'Preston_sleeper@ios.doi.gov'; 'Ken.salazer@ios.doi.gov'; 'Paul_henson@fws.gov'; 'Joe_zisa@fws.gov'; 'mailroomR6@fs.fed.us'; 'Energy.in.internet@odoe.state.or.us'; 'camarata.mary@deq.state.or.us'; 'Laura_todd@fws.gov'; 'Gary.W.Lynch@mlrr.oregongeology.com'; 'louise.c.solliday@state.or.us'; 'gloria.kiryuta@state.or.us'; 'Roger.roper@state.or.us'; 'howard.a.gard@state.or.us'; 'Heather.c.howe@odot.state.or.us'; 'Frances.brindle@odot.state.or.us'; 'Savannah.CRAWFORD@odot.state.or.us'; 'howard.a.gard@state.or.us'; 'sue.vrilakas@pdx.edu'; 'iris.riggs@state.or.us'; 'jbyers@oda.state.or.us'; 'robert.w.edwards@state.or.us'; 'kurt.a.corey@ci.eugene.or.us'; 'Rob.lnerfeld@ci.eugene.or.us'; 'lisa.a.gardner@ci.eugene.or.us'; 'kitty.piercy@ci.eugene.or.us'; 'jon.r.ruiz@ci.eugene.or.us'; 'bill.morgan@co.lane.or.us'; 'lydia.mckinney@co.lane.or.us'; 'Faye.Stewart@co.lane.or.us'; 'Jay.Bozievich@co.lane.or.us'; 'Rob.Handy@co.lane.or.us'; 'pete.sorenson@co.lane.or.us'; 'Sid.Leiken@co.lane.or.us'; 'bobk@willamalane.org'; 'smarkos@lrapa.org'; 'lrapa@lrapa.org'; 'bwilson@lcog.org'; 'pfarrington@peacehealth.org'; 'russell_g@4J.lane.edu'; TOWERY Doris <Doris.Towery@ltd.org>; EYSTER Michael <Michael.Eyster@ltd.org>; DUBICK Michael <Michael.Dubick@ltd.org>; NECKER Ed <Ed.Necker@ltd.org>; GILLESPIE Gary <Gary.Gillespie@ltd.org>; EVANS Greg <Greg.Evans@ltd.org>; 'Dean.kotge@ltd.org'; 'steven.newcomb@eweb.eugene.or.us'; 'rgnews@registerguard.com'; 'editor@springfieldtimes.net'; 't.gonzalez@churchillmedia.com'; 'billlundun@bicoastalmedia.com'; 'Roberta.ando@hud.gov'; 'comment.question@laneelectric.com'; 'TomJ@epud.org'; 'grikhoff@uoregon.edu'; 'nwnaturalwebmail@nwnatural.com'; 'bellamy@4J.lane.edu'; 'rsuppah@wstribes.org'; 'dpigsley@msn.com'; 'MayorCouncilandCityManagers@ci.eugene.or.us'; VANWINKLE Lisa <Lisa.VanWinkle@ltd.org>; EVANS John <John.Evans@ltd.org>; PERRON Kelly <Kelly.Perron@ltd.org>; SCHWETZ Tom <Tom.Schwetz@ltd.org>; Ric Ingham (ringham@ci.veneta.or.us); 'Cheryle Kennedy' <cheryle.kennedy@grandronde.org>

From: PERRON Kelly **On Behalf Of** EVANS John
Sent: Monday, July 16, 2012 3:02 PM
Subject: West Eugene EmX Extension Environmental Assessment Is Available for Public Review

Lane Transit District (LTD) announces that the Environmental Assessment (EA) for the proposed West Eugene EmX Extension in Eugene, Oregon, is available for public review now through Wednesday, August 29, 2012. The EA identifies the potential beneficial and adverse environmental, social, and economic effects of the proposed West Eugene EmX Extension project. This federal public disclosure document was prepared by technical experts and LTD in cooperation with the Federal Transit Administration (FTA) as required by the National Environmental Policy Act (NEPA).

The EA document is available online at weemx.ltd.org. Print and electronic copies of the EA are also available at the Eugene Public Library at 100 West 10th Avenue in Eugene, the Springfield Public Library at 225 Fifth Street in Springfield, the LTD Administration Office at 3500 East 17th Avenue in Eugene, and the LTD Customer Service Center at 1080 Willamette Street in Eugene. Print and electronic copies of the EA are available for purchase upon request by contacting LTD at 541-682-6100 or by e-mailing we.emx@ltd.org.

Comments on the content of the EA must be submitted in writing no later than 5 p.m. on Wednesday, August 29, 2012, via e-mail to we.emx@ltd, or U.S. mail to Lane Transit District, P.O. Box 7070, Springfield, OR 97475. Comment letters should contain "EA Comments" in the subject line.

Visit weemx.ltd.org to learn more about the West Eugene EmX Extension project.

John Evans, AICP
Senior Project Manager
Lane Transit District
PO Box 7070
Eugene, OR 97401
Phone: 541-682-6146
Cell: 541-913-6430
Fax: 541-682-6111

LTD has a new mailing address! Please use: Lane Transit District, PO Box 7070, Springfield, OR 97475-0470

Messages to and from this e-mail address may be available to the public under Oregon's public records law.

PERRON Kelly

From: PERRON Kelly
Sent: Monday, July 16, 2012 3:30 PM
Subject: West Eugene EmX Extension Environmental Assessment Is Available for Public Review

Lane Transit District (LTD) announces that the Environmental Assessment (EA) for the proposed West Eugene EmX Extension in Eugene, Oregon, is available for public review now through Wednesday, August 29, 2012. The EA identifies the potential beneficial and adverse environmental, social, and economic effects of the proposed West Eugene EmX Extension project. This federal public disclosure document was prepared by technical experts and LTD in cooperation with the Federal Transit Administration (FTA) as required by the National Environmental Policy Act (NEPA).

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PERRON Kelly

From: VANWINKLE Lisa
Sent: Monday, July 16, 2012 3:01 PM
To: *All
Subject: WEEE Environmental Assessment Is Available for Public Review

A message to all employees...

West Eugene EmX Extension Environmental Assessment Available for Public Review

The Environmental Assessment (EA) for the proposed West Eugene EmX Extension will be available for a 45-day public review period beginning today, Monday, July 16, through Wednesday, August 29, 2012. The EA identifies the potential beneficial and adverse environmental, social, and economic effects of the proposed EmX project. This federal public disclosure document was prepared by technical experts and LTD in cooperation with the Federal Transit Administration (FTA) as required by the National Environmental Policy Act (NEPA).

Those interested may review the EA document at weemx.ltd.org, or view print or electronic copies of the project document at the locations listed below. Print and electronic copies of the EA are also available for purchase upon request by contacting LTD at 541-682-6100 or by e-mailing we.emx@ltd.org.

- Eugene Public Library, 100 West 10th Avenue, Eugene
- Springfield Public Library, 225 Fifth Street, Springfield
- LTD Administration Office, 3500 E. 17th Avenue, Eugene
- LTD Customer Service Center, 1080 Willamette Street, Eugene

Two public drop-in sessions will be held on Wednesday, July 25, and Tuesday, August 7, 2012. Members of the West Eugene EmX Extension team will be on hand to explain the content of the EA and to answer project questions. Project staff will be available from 12 p.m. to 7 p.m. at the LTD Next Stop Center, 1099 Olive Street in Eugene. *The Center is wheelchair accessible and alternative formats of printed material and/or a sign language interpreter will be made available with 48 hours' notice. For more information, call 541-682-6100 (voice) or 7-1-1 (TTY).*

Comments on the contents or conclusions of the EA must be submitted in writing no later than 5 p.m. on Wednesday, August 29, 2012. Input may be e-mailed to we.emx@ltd or mailed to Lane Transit District, P.O. Box 7070, Springfield, OR 97475. Comment letters should contain "EA Comments" in the subject line.

At the conclusion of the public review period, LTD and FTA will review and respond to comments as part of the project's subsequent environmental documentation. If the FTA finds that all significant impacts have been avoided or mitigated, a Finding of No Significant Impact (FONSI) will be issued. This action will complete the environmental planning and review process.

The West Eugene EmX Extension project will then move into the final local review process, whereby the Eugene City Council and the LTD Board of Directors will decide whether or not to reaffirm the locally preferred alternative (LPA). The LPA is the route and concept design that EmX would travel from the Eugene Station to the terminus at Commerce Street in West Eugene.

If the project is reaffirmed, LTD will conduct preliminary design and engineering services and construct the EmX corridor. The new EmX service could open to the public by early 2017.

The project would benefit the community in several ways:

- Improvements along West 6th/7th and 11th Avenues, including increased capacity at eight major intersections, 5.9 miles of new street pavement, and 4.7 miles of upgraded sidewalks
- Two new bike/pedestrian bridges over Amazon Creek with connections to West 11th Avenue.
- Additional 8.8 new round-trip miles for a total of 24 round-trip miles of fast, frequent, and easy “one-seat ride” EmX service
- Twenty-five new high-quality EmX stations and seven new EmX vehicles
- Improved travel time for both transit and regular traffic along the entire West Eugene corridor
- Lower long-term transit operating costs, thereby maintaining funds for quality service into the future

Let me know if you have questions. Thank you.

Lisa VanWinkle

LTD Capital Projects, West Eugene EmX, and *point2point Solutions*

P 541-682-6212 or 541-335-9351

F 541-682-6111

lisa.vanwinkle@ltd.org

ltd.org

point2pointsolutions.org

LTD has a new mailing address! Please use: LTD, PO Box 7070, Springfield, OR 97475-0470



Messages to and from this e-mail address may be available to the public under Oregon's public records law.

From: BRADFORD Hannah
Sent: Monday, September 17, 2012 11:50 AM
To: PERRON Kelly
Subject: FW: West Eugene Environmental Assessment Now Available

Having trouble viewing this email? Go [here](#).



JULY 16, 2012


ENVIRONMENTAL ASSESSMENT AVAILABLE FOR PUBLIC REVIEW

The Environmental Assessment (EA) for the proposed West Eugene EmX Extension is available for public review now through Wednesday, August 29, 2012. The EA identifies the potential beneficial and adverse environmental, social, and economic effects of the proposed EmX project. This federal public disclosure document was prepared by technical experts and LTD in cooperation with the Federal Transit Administration (FTA) as required by the National Environmental Policy Act (NEPA).

You may review the EA document at weemx.ltd.org, or view print copies of the document at the LTD Administration Office, the LTD Customer Service Center, the Eugene Public Library, and the Springfield Public Library. [Click here](#) for more details, how to submit comments, and how to purchase print or electronic copies of the EA. Two public drop-in sessions also will be held to explain the content of the EA and answer questions.

Visit weemx.ltd.org to learn more about the West Eugene EmX Extension project.

ATU RATIFIES LABOR AGREEMENT

 Members of the Amalgamated Transit Union (ATU) Local 757 representing LTD's drivers and other contract labor ratified a new three-year labor agreement on June 29. The LTD Board approved the contract on Monday, July 2. The previous contract expired June 30, 2011, which means the new contract will be in effect through June 30, 2014.

HOP ABOARD FOR SUMMER FUN

Summer is full of fairs, festivities, and fun! LTD is pleased to partner with community organizations to help you enjoy the best of summertime. You can hop aboard the bus for the events listed below. Visit ltd.org for more details.

[Oregon Bach Festival](#)

June 29-July 15

[Oregon Country Fair](#)

July 13-15

[Springfield Summer Fair](#)

July 20-22

[Willamette Valley Blues and Brews](#)

IN THIS ISSUE

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- ATU RATIFIES LABOR AGREEMENT
- HOP ABOARD FOR SUMMER FUN
- POPCORN, PEANUTS, AND BASEBALL
- TRANSIT TO THE TRIALS
- FREEDOM PASS ON SALE NOW

LINKS

- LTD WEBSITE
- FOLLOW LTD ON TWITTER
- LTD'S FACEBOOK PAGE



August 3-4
[Lane County Fair](#)
August 15-19
[Eugene Celebration](#)
August 24-26
[Bring Home and Garden Tour](#)
September 16

POPCORN, PEANUTS, AND BASEBALL



LTD riders with a valid monthly bus pass or sticker, including group pass participants, will get \$2 off the purchase of an EMS baseball home game ticket! The offer is good on any game date and is good for one discount ticket per bus pass, per game. Visit the [Ems web site](#) for more information.

TRANSIT TO THE TRIALS

Thousands of local residents and visiting track fans rode LTD to the U.S Olympic Trials at historic Hayward Field. Passenger boardings across the LTD system rose an estimated four percent during the June 21 – July 2 event. We'd love to take you to the Olympic Games in London, but our vehicles don't fly or float. At least not yet.



FREEDOM PASS ON SALE NOW

If you are 18 or under, you can get around all summer for only \$35! Buy a Freedom Pass at LTD Customer Service or any [LTD sales outlet](#) and use it through July and August. It's a great deal!



This email was delivered to hannah.bradford@ltd.org on behalf of LTD. To ensure delivery, please add ltd@ltd.org to your address book.

[Unsubscribe](#) | [Manage/update your email preferences?](#)

Postal address: PO Box 7070, Eugene, OR 97401 USA



FORWARD THINKING TRANSIT

West Eugene EmX Extension

Environmental Assessment Now Available

The Environmental Assessment (EA) for the West Eugene EmX Extension is available for public review. The EA identifies the potential beneficial and adverse environmental, social, and economic effects of the proposed West Eugene EmX Extension project.

The EA and all supporting documentation can be viewed at weemx.ltd.org. Beginning Monday, July 16, through Wednesday, August 29, 2012 (45 days), printed copies of the EA document will be available at the following locations:

- LTD Administration Office
3500 E. 17th Avenue, Eugene
- LTD Customer Service Center
1080 Willamette St., Eugene
- Eugene Public Library
100 West 10th Avenue, Eugene
- Springfield Public Library
225 Fifth Street, Springfield

Copies of the EA in print or electronic format are available for purchase upon request. Please contact LTD at 541-682-6100 or e-mail we.emx@ltd.org.

If you have comments related to the content of the EA, submit them in writing by 5 p.m. Wednesday, August 29, 2012. Please put "EA Comments" in the subject line.

E-mail: we.emx@ltd.org

Mail: Lane Transit District, P.O. Box 7070
Springfield, OR 97475

Visit weemx.ltd.org to learn more about the West Eugene EmX Extension project.

Visítenos

El personal de LTD estará listo para explicar el contenido de la EA y para responder las preguntas sobre el proyecto.

- El miércoles, 25 de julio desde las 12 del mediodía hasta las 7 p.m.
- El martes, 7 de agosto desde las 12 del mediodía hasta las 7 p.m.

LTD Next Stop Center,
1099 Olive Street, Eugene

El Next Stop Center es accesible para personas en sillas de ruedas. Si necesita ayuda por alguna condición física o con el idioma, por favor llame al 541-682-6100 o al 7-1-1 TTY.

Drop In Sessions

LTD staff will be on hand to explain the content of the EA and to answer project questions.

- Wednesday, July 25, 12 p.m. – 7 p.m.
- Tuesday, August 7, 12 p.m. – 7 p.m.

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Eugene

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The Best
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Connect



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West Eugene EmX Extension

La Evaluación Ambiental ya está Disponible

La Evaluación Ambiental (EA) para la Extensión del West Eugene EmX ya está disponible para ser revisada por el público. La EA identifica los efectos potenciales, beneficiosos y adversos para el ambiente, en lo social y económico que tendría el proyecto de Extensión del West Eugene EmX que se propone.

La EA y todos los documentos de apoyo correspondientes pueden ser vistos en weemx.ltd.org. A partir del lunes, 16 de julio hasta el miércoles, 29 de agosto del 2012 (45 días), las copias impresas del documento de Evaluación Ambiental estarán disponibles en los siguientes lugares:

- Las Oficinas Administrativas de LTD
3500 E. 17th Avenue, Eugene
- Centro de Servicio para Pasajeros de LTD,
1080 Willamette Street, Eugene
- Biblioteca Pública de Eugene
100 West 10th Avenue, Eugene
- Biblioteca Pública de Springfield
225 Fifth Street, Springfield

Se puede comprar un copias de la EA en formato impreso o electrónica en CD bajo pedido; por favor póngase en contacto con LTD al 541-682-6100 o por correo electrónico: we.emx@ltd.org.

Si tiene comentarios relacionados al contenido de la EA, envíelos por escrito hasta las 5 p.m. el miércoles, 29 de agosto del 2012.

Por correo electrónico: we.emx@ltd.org

Por correo: Lane Transit District, P.O. Box 7070
Springfield, OR 97475

Para obtener más información sobre el proyecto, visita el sitio web de West Eugene EmX: weemx.ltd.org



FORWARD THINKING TRANSIT

West Eugene EmX Extension

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Springfield, OR 97475

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West Eugene EmX Extension

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Springfield, OR 97475

Para obtener más información sobre el proyecto, visite el sitio web de West Eugene EmX: weemx.ltd.org



PO Box 7070
Springfield, OR 97475

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West Eugene
EmX
Environmental
Assessment
Now Available

West Eugene EmX Extension Environmental Assessment Now Available

Drop In Sessions

LTD staff will be on hand to explain the content of the EA.

Times: 12 p.m. – 7 p.m.
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Visit weemx.ltd.org to learn more about the West Eugene EmX project.

Si desea información en español, por favor llame a LTD al 541-682-6100 ó visite nuestra pagina web: weemx.ltd.org.



West Eugene EmX Extension

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ltd.org

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The EA and all supporting documentation can be viewed at weemx.ltd.org. Beginning Monday, July 16, through Wednesday, August 29, 2012 (45 days), printed copies of the EA document will be available at the following locations:

- LTD Administration Office
3500 E. 17th Avenue, Eugene
- LTD Customer Service Center
1080 Willamette St., Eugene
- Eugene Public Library
100 West 10th Avenue, Eugene
- Springfield Public Library
225 Fifth Street, Springfield

Copies of the EA in print or electronic format are available for purchase upon request. Please contact LTD at 541-682-6100 or e-mail we.emx@ltd.org.

If you have comments related to the content of the EA, submit them in writing by 5 p.m. Wednesday, August 29, 2012. Please put "EA Comments" in the subject line.

E-mail: we.emx@ltd.org

Mail: Lane Transit District, P.O. Box 7070
Springfield, OR 97475

Visit weemx.ltd.org to learn more about the West Eugene EmX Extension project.

Visítenos

El personal de LTD estará listo para explicar el contenido de la EA y para responder las preguntas sobre el proyecto.

- El miércoles, 25 de julio desde las 12 del mediodía hasta las 7 p.m.
 - El martes, 7 de agosto desde las 12 del mediodía hasta las 7 p.m.
- LTD Next Stop Center,
1099 Olive Street, Eugene

El Next Stop Center es accesible para personas en sillas de ruedas. Si necesita ayuda por alguna condición física o con el idioma, por favor llame al 541-682-6100 o al 7-1-1 TTY.

Drop In Sessions

LTD staff will be on hand to explain the content of the EA and to answer project questions.

- Wednesday, July 25, 12 p.m. – 7 p.m.
- Tuesday, August 7, 12 p.m. – 7 p.m.

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Eugene

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West Eugene EmX Extension

La Evaluación Ambiental ya está Disponible

La Evaluación Ambiental (EA) para la Extensión del West Eugene EmX ya está disponible para ser revisada por el público. La EA identifica los efectos potenciales, beneficiosos y adversos para el ambiente, en lo social y económico que tendría el proyecto de Extensión del West Eugene EmX que se propone.

La EA y todos los documentos de apoyo correspondientes pueden ser vistos en weemx.ltd.org. A partir del lunes, 16 de julio hasta el miércoles, 29 de agosto del 2012 (45 días), las copias impresas del documento de Evaluación Ambiental estarán disponibles en los siguientes lugares:

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Se puede comprar un copias de la EA en formato impreso o electrónica en CD bajo pedido; por favor póngase en contacto con LTD al 541-682-6100 o por correo electrónico: we.emx@ltd.org.

Si tiene comentarios relacionados al contenido de la EA, envíelos por escrito hasta las 5 p.m. el miércoles, 29 de agosto del 2012.

Por correo electrónico: we.emx@ltd.org

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Springfield, OR 97475

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FORWARD THINKING TRANSIT

West Eugene EmX Extension
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ltd.org

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Appendix B: Comments Received on the EA and Responses to Comments

Appendix B: Comments Received on the EA and Responses to Comments

Public Review Drop-In Sessions - Sign In Sheets, Wednesday, July 25, 2012

Public Review Drop-In Sessions - Sign In Sheets, Tuesday, August 7, 2012

Table 1. Comments Received During Public Review Period (July 16 – September 5, 2012)

Table 2. Responses to Comments

Original Comment Letters (on disk in sleeve at end of this appendix)

LTD held an extended 45-day public review period for the Environmental Assessment (EA) starting on July 16 and ending on August 29, 2012. Although the EA requested that comment letters be sent to LTD, many commenters sent letters and emails to FTA. As a result, FTA extended the comment period by one week to September 5 to ensure that all comment letters were received and considered. The comments received during that period are addressed below.

FTA has reviewed all of the comments submitted during the comment period. FTA's obligation under the National Environmental Policy Act (NEPA) is to respond to substantive questions related to the content of the EA. Questions and comments related to previous or future public policy decisions are considered by decision makers, but not as part of the EA; thus, no response is provided as part of the environmental process. A considerable number of comments about the WEEE fell into this category.

To help ensure that policy-making officials are aware of all the issues raised and opinions expressed, regardless of whether the comments were considered substantive NEPA comments, FTA directed LTD to forward all comments received by September 5 to the LTD Board and the Eugene City Council.

Using This Appendix

Table 1 below organizes and briefly summarizes the comments received. The letters are organized alphabetically by sender. (The exceptions to this are the four letters received after August 29, which were added to the end of the table.) "Letter" in this context also includes emails and other forms of communication. "Comment" in this context refers to a main point or theme or question, so that a given letter might include a number of separate comments. One or more numbers in parentheses follows each comment in this table, and those numbers are the response number(s) for each comment. The response numbers are tied to Table 2, which contains the corresponding numbered responses. If a comment letter or email received included any attachments, this is indicated in Table 2.

FTA and LTD received organizational comments on behalf of three organizations: Friends of Eugene (Letter #170); OMOT (Letters #137, #200 and #201); and the League of Women Voters (Letter #197).

FTA and LTD received numerous comments that were transmitted through a website established by the "Our Money Our Transit" (OMOT) organization. FTA understood that to be a convenience provided by OMOT and so has not identified those comments as being official OMOT organizational comments.

Comment letters in their entirety are reproduced on a CD in the sleeve at the end of this appendix. This CD includes the following files: (1) All comment letters, collected into one file (file size more than 80MB in size); (2) a spreadsheet with hyperlinks to individual comment letters; and (3) files for each of the 329 individual comment letters (329 files).



Lane Transit District

West Eugene EmX Extension Project
Drop-in Session
Next Stop Center
Wednesday, July 25, 2012
12 p.m. - 7 p.m.

Sign-In Sheet



Name (Please print clearly)	Mailing Address	E-mail	Phone
Mickyl Parsons	HARDSEVER@yahoo.com	hardsever@yahoo.com	
John Fantelle		No Student	
Wendy Butler-Boyesen	1265 City View, Eugene 97401	wendybutler@comcast.net	
Pat Hocken	338 W. 11th #101 Eugene OR 97401	PH	
Hoover Chambliss	1153 Hayes St. #306 Eugene	hooverjchambliss@gmail.com	541-206 9852
NELL HILDEBRAND	133 OLIVE STREET #320		541-431- 6977
Josh Buschbacher	1327 City View St	josh@efn.org	541-743-6349
Chris Watkies	1035 MONROE Eugene, OR 97402	transwatch@mindspring.com	541-384-1786

This document is a public record subject to disclosure under the Oregon Public Records Law.



Lane Transit District

West Eugene EmX Extension Project
Drop-in Session
Next Stop Center
Tuesday, August 7, 2012
12 p.m. - 7 p.m.

Sign-In Sheet



Name (Please print clearly)	Mailing Address	E-mail	Phone
Bah Ray	37647 upper ct ck Rd		
Len Klockberg	220 N. ADAMS	LEATH@EFN.ORG	
Wendy Butler-Boyd	you here it		
TOM SNYDER	1143 MANROE ST. BUG	TJSNYDER@MOMENTSINTIMEEXHIBIT	541-345-2581
Marion Walter	1846 Dacland St		
Rob Zabo	1290-D E. 29 th 97403	robzabo@gmail.com	541-343-5201

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
1	8/23/2012	Allen, Dave	Gateway EmX created unplanned congestion; so will WEEE. (3)
2	8/24/2012	Alley, James	I support the EmX project. (1)
3	8/24/2012	Alley, Lorraine	I oppose the EmX project. (1)
4	8/25/2012	Almeida, Karyn	I oppose the EmX project. (1)
5	8/30/2012	Anderson, John	I oppose the EmX project. (1)
6	8/25/2012	Anderson, Ted	There is no economic justification for this expenditure of taxpayer money. (8)
6	8/25/2012	Anderson, Ted	Buses using W11th Ave are not filled now. (36)
7	7/19/2012	Unsigned	We don't need it and don't want it. (1)
7	7/19/2012	Unsigned	EmX will cause more congestion, more pollution, and expense than any benefit it could bring. (10, 11, 13, 26, 29)
7	7/19/2012	Unsigned	The buses now are nearly empty. (36, 37, 38)
8	7/23/2012	Unsigned	The project is a bad idea. (1)
9	8/2/2012	Unsigned	I've been delayed too many times by a large, almost-empty bus. (37)
9	8/2/2012	Unsigned	EmX buses delay traffic and waste taxpayer funds. (26, 35)
9	8/2/2012	Unsigned	The project is expensive and not self-supporting; it is an attempt to justify a runaway bureaucracy. (6, 40)
9	8/2/2012	Unsigned	We need a compact, self-sufficient, and efficient bus system. (35, 37, 39)
10	8/27/2012	Unsigned	We cannot maintain these expensive buses over the years. (6, 37)
10	8/27/2012	Unsigned	Ridership evaluations are suspect. Buses now are almost empty. (3, 38)
10	8/27/2012	Unsigned	With EmX buses taking up another lane of the congested areas of West 11th or West 6th, I will avoid that area in the future. (26)
10	8/27/2012	Unsigned	LTD should let the people vote on it. (4)
11	8/29/2012	Unsigned	West 11th is already congested and crowded with cars; EmX will worsen it. (26)
11	8/29/2012	Unsigned	I oppose the EmX project. (1)
12	9/4/2012	Unsigned	Please continue your battle against the green dragon, I'm telling your customers how much they can save by avoiding your businesses all together. (1)
13	8/24/2012	Armstrong, Cindy	I oppose the EmX project. (1)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
13	8/24/2012	Armstrong, Cindy	Why are we going to clog up traffic there now by taking away a lane we have paid for? (26)
13	8/24/2012	Armstrong, Cindy	Why do you want to put businesses in jeopardy? (19, 20)
13	8/24/2012	Armstrong, Cindy	Even though you have had a study done that says otherwise, how do you really know? (3)
13	8/24/2012	Armstrong, Cindy	You should improve what we already have. (35)
14	8/24/2012	Arnold, Burton	You could just route smaller buses into areas as needed. (35)
14	8/24/2012	Arnold, Burton	It's too far to walk to the EmX line. (37)
15	8/22/2012	Arola, Lorrie	Government should spend the money on education, parks, or other areas in our community that need improvement. (8)
16	8/29/2012	Babcock, Ronald	There is no pressing need for LTD to take property and expand WEEE with EmX; the system in place functions as intended. (9, 22, 36) [with attachments]
16	8/29/2012	Babcock, Ronald	LTD cannot afford additional operating expenses. (6) [with attachments]
16	8/29/2012	Babcock, Ronald	I am skeptical of the ridership forecasts. (3, 11, 37) [with attachments]
16	8/29/2012	Babcock, Ronald	There is inadequate funding for other priorities such as education, public safety, and social services. (8) [with attachments]
16	8/29/2012	Babcock, Ronald	How will LTD deal with financial challenges? (5) [with attachments]
17	8/22/2012	Baker, Aaron	I oppose the EmX project. (1)
17	8/22/2012	Baker, Aaron	LTD boardings and ridership numbers are unaudited and unreliable. (3, 11, 15, 37)
18	8/27/2012	Ballard, Yvonne	I oppose the EmX project. (1)
18	8/27/2012	Ballard, Yvonne	The project is too costly. (6)
18	8/27/2012	Ballard, Yvonne	It is already hard to make left turn on 11th. (26)
18	8/27/2012	Ballard, Yvonne	Most businesses there cannot be served by bus. (39)
19	8/29/2012	Baltazar, Edgar	People are not going to get out of their cars for the EmX. (37, 39)
19	8/29/2012	Baltazar, Edgar	Eugene doesn't require this level of service with 60-foot buses. (39)
20	8/24/2012	Barnard, Shannon	EmX is expensive and not needed. (1, 6)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
21	8/28/2012	Barnhart, Jim	I strongly oppose the EmX project. (1)
22	8/24/2012	Bassett, Andrea	It's irresponsible to spend \$95 million on EmX in this economy. (8)
23	8/24/2012	Bassett, Robert	Taxpayers would be better served using the money elsewhere until and if the economy improves. (8)
24	8/23/2012	Beers, Ann	I oppose the EmX project. (1)
24	8/23/2012	Beers, Ann	The route requires too much walking to/from riders' homes and is hard for physically and mentally challenged LTD riders. (16, 17)
24	8/23/2012	Beers, Ann	This expensive project is unneeded and impractical. (1, 6, 9)
25	8/23/2012	Beers, Dick	The project's route and expense are inappropriate. (6, 10, 11)
25	8/23/2012	Beers, Dick	The current buses are adequate for the area. (36)
25	8/23/2012	Beers, Dick	The LTD payroll tax is not enough to pay for it. (5)
26	8/13/2012	Benson, Roy	The project is unwanted by at least half the population. (2)
26	8/13/2012	Benson, Roy	Traffic will be a problem for my business, located at 6th and Chambers. (24, 26)
27	8/24/2012	Benson, Roy	Why have public comment? It will change nothing. (1, 2, 10)
28	8/23/2012	Bernhardt, Rich	The west Eugene route visits local businesses and does not service the main population. (38)
28	8/23/2012	Bernhardt, Rich	There is no park and ride at the west end of the route and no plans to make the end a hub that serves the western part of the city. (43)
28	8/23/2012	Bernhardt, Rich	LTD should plan a route to serve River Road or Coburg areas. (4, 10)
28	8/23/2012	Bernhardt, Rich	LTD should build bus pullouts so buses don't block traffic. This would cost much less than the current plan. (26)
29	8/22/2012	Berryhill, Jerome	LTD buses impede the flow of traffic on 11th. The project will worsen it and extend the problem to 6th and 7th. (26)
29	8/22/2012	Berryhill, Jerome	Putting two-way bus traffic next to a one-way traffic lane is extremely dangerous to cross-traffic, especially bicycles and pedestrians. (26)
29	8/22/2012	Berryhill, Jerome	I oppose the EmX project. (1)
30	8/24/2012	Biersdorff, Kevin	The project should be paid for with user fees or not at all. (40)
30	8/24/2012	Biersdorff, Kevin	We have more important uses for local funds. (8)

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30	8/24/2012	Biersdorff, Kevin	What is the annual per-rider cost for operations and maintenance along with retiring the debt for capital construction? (37)
30	8/24/2012	Biersdorff, Kevin	How will the loss of lanes be compensated for? (26)
31	8/22/2012	Bigelow, Douglas	LTD uses public funds to try to silence the opposition. (14)
32	8/29/2012	Black, Linda	A properly designed TSM would be more cost effective. (6, 10, 11)
33	8/22/2012	Blaser, Darrell	What are the PERS costs going to be for this EmX? Who in the Transportation Unions are donating to the politicians' campaigns for reelection? (1)
34	8/22/2012	Bohannon, Susan	EmX will kill trees, and many animals will be affected. (29)
34	8/22/2012	Bohannon, Susan	There are still diesel fumes. (3, 29)
34	8/22/2012	Bohannon, Susan	The project's operating cost and "true efficiency" information make this project undesirable. (6)
35	8/29/2012	Bowman, Brian	Why have public comment? Nothing is going to change. (1, 2, 10)
35	8/29/2012	Bowman, Brian	The majority of the people who care about this are strongly opposed to it. Many others are not interested at all. (1, 2)
35	8/29/2012	Bowman, Brian	It violates private property rights to force an unwilling landowner to do something with his property that he does not want to do unless there is an overriding public interest that necessitates it. (22)
35	8/29/2012	Bowman, Brian	We already have buses that run through West Eugene. (36)
35	8/29/2012	Bowman, Brian	The United States Federal Government is broke. (8)
36	8/29/2012	Boyesen, Marty	As a stroke survivor who cannot drive, walks with a cane and often uses RideSource, I support the EmX project. (1)
37	8/29/2012	Bratton, Elizabeth/Nick	We support the EmX project. (1)
38	8/22/2012	Breeden, John	The project is a waste of money that we do not have. (5, 6, 8)
38	8/22/2012	Breeden, John	Our present bus system is more than adequate. (36)
39	8/23/2012	Brown, John	LTD shouldn't choose the most expensive route to acquire and operate, when there is a less expensive alternative available. (5, 6, 10)
39	8/23/2012	Brown, John	LTD should demonstrate through its actions that it is listening and cares about how this impacts finances of local employers. (2)
39	8/23/2012	Brown, John	That the LTD Board is appointed and can raise our taxes without any vote or recourse is fundamentally wrong. (4)
40	8/29/2012	Brown, Lindy	No one at the west end of Eugene wants this. (1, 2)
41	8/29/2012	Bryan, Ed	Project will harm the freight corridor and change bus service. (24, 25)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
42	8/29/2012	Butler-Boyesen, Wendy	I support the EmX project. (1)
43	8/29/2012	Butler-Boyesen, Wendy	I support the project because it will enhance the educational opportunities for local students. (1)
44	8/22/2012	Callahan, Mark	Project is fiscally irresponsible, eliminates existing routes and leaves pensions further unfunded (5)
44	8/22/2012	Callahan, Mark	The operational budget is not financially sustainable. (6)
45	8/16/2012	Cary, Richard	LTD failed to consider minority businesses in the corridor. (17)
46	8/22/2012	Casady, Dennis	LTD should let the people vote on the EmX project. (4)
46	8/22/2012	Casady, Dennis	The proposed EmX will take lanes away from traffic, creating a more crowded and dangerous avenue. (24, 26)
47	8/22/2012	Casas, Margaret	I oppose the EmX project. (1)
48	8/29/2012	Cauthorn, Paul	I oppose the EmX project. (1)
48	8/29/2012	Cauthorn, Paul	Our country cannot afford to keep spending and borrowing. (8)
49	8/30/2012	Chen, Mirka	The EmX buses are empty most of the time. (36)
49	8/30/2012	Chen, Mirka	We should not spend millions of dollars for something that might help us in 20 years. (37)
49	8/30/2012	Chen, Mirka	It will destroy the small businesses on West 11th. (19, 20)
50	8/26/2012	Chmela, Leilani	The project will make West 11th worse than it already is. (3, 26)
50	8/26/2012	Chmela, Leilani	The project is unnecessary and will cause congestion. (25, 37)
51	8/29/2012	Christy, Robert	The project is a waste of public money. (1)
52	8/28/2012	Clark, Jack	In the long run the project will harm businesses; in the short-term, we waste opportunities to use the money in more vital areas. (8)
53	8/22/2012	Clarke, Bob	I oppose the EmX project. It is a waste of public money. (1)
53	8/22/2012	Clarke, Bob	It does not improve service to the West Eugene area. (36)
54	8/29/2012	Clem, Steve	The project costs too much. (6)
54	8/29/2012	Clem, Steve	The project will harm my company, family and employees. (1, 20, 29)
55	8/28/2012	Clemons, Anthony	The project will make West 11th dangerous and congested. (26)
56	8/28/2012	Clemons, Priscilla	Buses along West 11th are sufficient for the number of riders. (36)
56	8/28/2012	Clemons, Priscilla	The project will make driving around there more dangerous. (26)
56	8/28/2012	Clemons, Priscilla	There will be less parking for businesses. (18)
56	8/28/2012	Clemons, Priscilla	I oppose the EmX project. (1)
57	8/22/2012	Coble, William	We should use our existing bus system for the needs that EmX is addressing. (35)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
57	8/22/2012	Coble, William	We cannot afford such unnecessary expenses during this time. (6, 8)
57	8/22/2012	Coble, William	My wife’s business in west Eugene cannot afford EmX issues with her customers. (19, 20)
57	8/22/2012	Coble, William	Because federal funds are offered does not mean we must take them. (8)
57	8/22/2012	Coble, William	We shouldn’t build it if we can’t pay for it locally. (4, 39)
58	8/29/2012	Cole, George	I support Mass Transit but the EmX project. (1)
58	8/29/2012	Cole, George	The Park and Ride lot [on West 11th] is not well used and is another example of LTD's poor planning and waste of resources. (43)
58	8/29/2012	Cole, George	I am skeptical of LTD's claim of mitigation to protect businesses. (32)
58	8/29/2012	Cole, George	They are ignoring their own criteria for success of a rapid transit system by running in mixed traffic initially. (26, 44)
59	8/29/2012	Collins, Mike	All three WEEE legs cover about the same distance and the same number of stops. Yet this leg with the lowest projected ridership is much more expensive. It is not cost effective or needed. (9, 37)
60	8/24/2012	Combie, Dora	LTD and EmX are drains on the economy in a rural area like Lane County. Routes are too long and riders are too few to be economically practical. (4, 9, 37, 39)
60	8/24/2012	Combie, Dora	We almost never use EmX. (1, 38)
61	8/24/2012	Combie, Fred	Bureaucrats wasting public money that someone else has earned. (4)
61	8/24/2012	Combie, Fred	LTD should prove that it can be more self-sustaining without tax increases before expanding the district further. (40)
62	8/29/2012	Coontz, Lena	This system is out of scale for low-density towns. (4, 9, 39)
63	8/28/2012	Cooper, Rodney	The EA refers to “significant” housing off W. 11th. I don’t see it. (3, 33)
63	8/28/2012	Cooper, Rodney	Since LTD feels that it’s important to supply bus service to existing housing along W. 11th, why did they recently cut transit service to several of these housing areas? (4, 5)
64	8/24/2012	Corno, Fran	This is not what we need in Eugene. (1, 39)
64	8/24/2012	Corno, Fran	We support LTD with our tax dollars, but we cannot sustain the costs involved in this project. (4, 5)
64	8/24/2012	Corno, Fran	We don’t need empty buses that add to the congestion. (26, 35)
64	8/24/2012	Corno, Fran	We don't need rapid transit with our population. (4, 9, 39)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
65	8/22/2012	Cossey, John	This is a waste of taxpayer money. (1)
65	8/22/2012	Cossey, John	LTD's operating expense is not feasible and higher than what it has stated. (6)
66	8/29/2012	Cottel, Don	This is the wrong solution to a problem that doesn't exist. (36, 39)
66	8/29/2012	Cottel, Don	This will make it harder to get through a congested area. (26)
66	8/29/2012	Cottel, Don	LTD should let the people vote on it. (4)
67	8/29/2012	Coven, Steve	I oppose the EmX project. (1)
67	8/29/2012	Coven, Steve	We need West 6th and 7th and West 11th Avenues for car traffic. (25)
67	8/29/2012	Coven, Steve	[Suggested alternative routing] (10)
67	8/29/2012	Coven, Steve	LTD should let the people vote on it. (4)
68	8/23/2012	Cox, Angela	EmX will not improve traffic congestion any less. (26)
68	8/23/2012	Cox, Angela	LTD should let the people vote on it. (4)
69	8/25/2012	Crabtree, Diane	LTD should not accept Federal funds for the project. (4, 8)
70	8/25/2012	Crabtree, Jack	LTD should let the people vote on it. (4)
71	8/22/2012	Crabtree, Joanne	I oppose the EmX project. (1)
71	8/22/2012	Crabtree, Joanne	LTD has not shown a need for the project. (9, 36)
71	8/22/2012	Crabtree, Joanne	LTD should not pursue federal money for the project. (4)
72	8/22/2012	Craig, Lesley	This project is a boondoggle. LTD cannot be objective about need or costs for the project. (1)
73	8/26/2012	Crawley, Connie	The project will negatively affect all west Eugene businesses and commuters. We oppose the EmX project. (1)
74	8/26/2012	Crawley, Don	I oppose the EmX project. (1)
75	8/23/2012	Cvitanovich, Danna	LTD should let the people vote on it. (4)
76	8/29/2012	D, R	We oppose the EmX project. (1)
76	8/29/2012	D, R	The current system works fine. (36)
76	8/29/2012	D, R	Diesel exhaust smoke should be stopped. (4, 29)
77	8/22/2012	Dahle, Dennis	I do not believe the EmX expansion will help congestion on W 11th. (26)
77	8/22/2012	Dahle, Dennis	The benefits will not outweigh the costs. (13, 33, 37)
77	8/22/2012	Dahle, Dennis	LTD should not build such a costly project that nearly half of the taxpayers actively oppose. (1, 2, 6)
77	8/22/2012	Dahle, Dennis	The construction (lasting months if not years) will be a daily source of frustration for everyone in Eugene. (19)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
77	8/22/2012	Dahle, Dennis	I oppose the project and think LTD should let the people vote on it. (1, 4)
78	8/24/2012	Day, Arthur	LTD should just run smaller LTD buses on the regular road. (35)
79	8/29/2012	DeHarpport, Rob	LTD should let the people vote on it. (4)
79	8/29/2012	DeHarpport, Rob	We have a more than adequate mass transit system and should not spend federal dollars for anything more. (4, 8, 36)
80	8/29/2012	Dellinger, Preston	I oppose the EmX project. (1)
80	8/29/2012	Dellinger, Preston	ODOT study led to 4-lane 6th and 7th. Traffic flows great. Turning one lane into BAT lane will worsen traffic. (24, 26)
80	8/29/2012	Dellinger, Preston	Businesses that depend on traffic (in cars) can't survive if drivers find it too congested or confusing to reach their place of business. (20, 26)
81	8/22/2012	Dellinger, Sandra	We have owned a business at 6th Ave and Polk for 30 years. Along with our tenant we provide 12 family wage jobs. The project plans to close one of our drive ways and put a station in our lot. We are unsure if we can keep our business open if this happens because (1) if you close a driveway facing Polk, we will no longer be able to work on large RV's, trucks and buses. (2) We will lose customers due to the station cutting off our visibility. (3) We can't lose parking, we are using all we have. Please consider local businesses and their long time employees. (18, 19, 20)
82	8/23/2012	Dellinger, Sandra	[Letter no 81 mistakenly refers to Polk Street driveway – it's actually 6th Ave. driveway]. (18, 19, 20)
83	8/29/2012	Demers, Rebecca	Forcing taxpayers to fund something they don't want or need is unfair, disrespectful and irresponsible. (1)
83	8/29/2012	Demers, Rebecca	Our roads need help, our budgets are not balanced, and many businesses are struggling. This plan will turn the area into a big mess causing people to avoid the area. It will hurt the very businesses who pay the LTD tax. (8, 19, 20)
83	8/29/2012	Demers, Rebecca	So if businesses lose money or go out of business who will make up for the lost tax revenue? (19, 20, 29)
84	8/24/2012	Donnelly, Maggie	This fiscally irresponsible plan makes us battle LTD to uphold our constitutional right to decide how our monies are best spent. (1, 4, 5, 8)
85	8/29/2012	Dorsey, Bernie	I oppose the EmX project. (1)
85	8/29/2012	Dorsey, Bernie	The project is not cost effective. (6)
85	8/29/2012	Dorsey, Bernie	The project will harm small businesses during and after construction. (19, 20)
86	8/28/2012	Dorsey, Donna	I oppose the EmX project. (1)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
86	8/28/2012	Dorsey, Donna	Local dollars will be lost when Eugene loses local businesses. (19, 20)
87	8/23/2012	Downing, Randy	This is not wanted by the majority. (2)
88	8/23/2012	Drury, Bob	[Comment suggests alternative routes.] (10)
88	8/23/2012	Drury, Bob	Anyone who thinks the project will make traffic better must be sniffing glue. (26)
88	8/23/2012	Drury, Bob	[Comment about Portland transit impacts on businesses.] (18, 19, 20)
88	8/23/2012	Drury, Bob	LTD should let the people vote on it. (4)
89	7/24/2012	Duber, Gloria / Ronald	We support the EmX project (and its public involvement). (1)
90	8/29/2012	Duffy, Patricia	I oppose the EmX project. (1)
90	8/29/2012	Duffy, Patricia	LTD is broke; it should not even consider any expansion. (5, 6)
91	8/22/2012	DuPriest, Robert	The project will cause congestion on W. 11th. (1, 26)
91	8/22/2012	DuPriest, Robert	Use small buses for low ridership and big buses as needed. (36)
91	8/22/2012	DuPriest, Robert	Don't waste money on EmX. (1, 6)
91	8/22/2012	DuPriest, Robert	The project will reduce tax revenues from businesses. (19, 20)
92	8/26/2012	Durbin, Gerald	The project will narrow W. 11th and worsen traffic. (1, 26)
92	8/26/2012	Durbin, Gerald	Riders should pay for more of LTD budget. Walk or ride a bike or raise the price of bus transit rides to the \$10 range. (4, 8, 40)
93	8/22/2012	Egbert, Daryl	As a business owner on W. 7th for over 28 years, I believe the project will interrupt my business. I have tried to negotiate these very same streets during this summer's construction. (19, 32)
93	8/22/2012	Egbert, Daryl	The construction costs are too high for the limited benefits. (6, 13)
93	8/22/2012	Egbert, Daryl	It is unwise to use funds from a government that can't balance its own budget. (8)
93	8/22/2012	Egbert, Daryl	This route was not the number one choice for LTD. (10)
93	8/22/2012	Egbert, Daryl	System is simply out of scale for low density towns and cities such as ours. (4, 9, 39)
93	8/22/2012	Egbert, Daryl	The project is likely to be a disaster. (1)
94	8/29/2012	Egbert, David	I oppose the EmX project. (1)
95	8/23/2012	Elmore, Robert	The streets of Eugene are too crowded as it is. (26)
95	8/23/2012	Elmore, Robert	Existing buses are generally near empty on these routes. (36)
95	8/23/2012	Elmore, Robert	LTD should listen to the public. (2)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
96	8/25/2012	Fenton, David	Even if money is available for this project that is no reason to just find something to spend it on. (4, 8)
96	8/25/2012	Fenton, David	It will do more harm than good to traffic and business. (26, 33, 37)
96	8/25/2012	Fenton, David	I oppose the EmX project. (1)
97	8/29/2012	Fields, Tracy	Taking away a lane of traffic will create terrible congestion. (26)
97	8/29/2012	Fields, Tracy	You will hurt the businesses that will have their access impeded. (19, 20)
97	8/29/2012	Fields, Tracy	The project cannot be sustainably funded. (6)
97	8/29/2012	Fields, Tracy	I oppose the EmX project! (1)
98	8/26/2012	Fuson, Regena	We oppose the project because the economy can't handle the cost. Federal money or not, it is a waste of taxpayer money. (1, 8)
98	8/26/2012	Fuson, Regena	It is also needless. (9, 36)
98	8/26/2012	Fuson, Regena	It will burden already congested areas. (26)
99	8/29/2012	Garcia, Rudy	The project will force cuts in existing bus service. LTD outspends its revenue. Get the budget under control before expanding EmX. (5)
100	8/29/2012	Gates, Devin	I oppose the project, like many others. (1,2)
100	8/29/2012	Gates, Devin	The slight traffic relief will not offset the loss of a traffic lane. (26)
100	8/29/2012	Gates, Devin	Construction will hurt businesses. (19)
100	8/29/2012	Gates, Devin	Since local businesses are funding LTD, they should have a say. (2)
100	8/29/2012	Gates, Devin	LTD should let the people vote on it. (4)
100	8/29/2012	Gates, Devin	The problems it will create outweigh the minute benefits. (13, 39)
100	8/29/2012	Gates, Devin	If the citizenry did not feel it was necessary enough to expand West 11th "parkway" how does LTD figure it is to our benefit to further bottleneck down this arterial? (13, 26)
101	8/28/2012	Gautsche, Shirnell	LTD ignores public input. (1, 10)
101	8/28/2012	Gautsche, Shirnell	Most people who care about this are strongly opposed to it. And many others are not even interested at all. (2)
101	8/28/2012	Gautsche, Shirnell	Government cannot force an unwilling landowner to do something with his property that he does not want to do unless an overriding public interest necessitates it. For that purpose there is Eminent Domain. But Eminent Domain should not be abused. (22)
101	8/28/2012	Gautsche, Shirnell	If it wasn't for the federal funds, no one at LTD would be considering this. (4, 9)
101	8/28/2012	Gautsche, Shirnell	We already have buses that run through West Eugene. (36)
101	8/28/2012	Gautsche, Shirnell	The Federal government is broke. (8)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
102	8/24/2012	Geer, Kathy	The portion of W 11th that is the most congested will be running the EmX mostly in mixed traffic. LTD will worsen the congestion as their 60-foot buses will occupy more space and block traffic. (26)
102	8/24/2012	Geer, Kathy	EmX is not a good fit for Eugene. (39)
102	8/24/2012	Geer, Kathy	I oppose the EmX project. (1)
103	8/29/2012	Goldstone, Paul	EmX ridership will never be enough to require the permanent use of vital traffic lanes and property. (22, 26, 37)
104	8/29/2012	Gordon, Miri	I oppose the EmX project. (1)
105	8/28/2012	Gray, Gene	I oppose the EmX project. (1)
105	8/28/2012	Gray, Gene	The project is not cost effective. (6)
105	8/28/2012	Gray, Gene	The stops are too far apart. (37)
105	8/28/2012	Gray, Gene	What percentage of the driving population will opt for riding the dragon? (38)
106	8/29/2012	Greer, Curtiss	The cost of operation EmX is too high. (5, 6)
107	8/27/2012	Groff, Dennis	LTD should let the people vote on it; most oppose it. (2, 4)
107	8/27/2012	Groff, Dennis	All funding of any public project comes from hard working taxpayers, whose money should not be squandered on things most people don't want. (2, 4, 8)
107	8/27/2012	Groff, Dennis	[Comment about a supporter who “has a zoning issue” before the Eugene City Council.] (34)
108	8/29/2012	Grose, Michael	I oppose the EmX project. (1)
108	8/29/2012	Grose, Michael	It is not cost-effective. (37)
108	8/29/2012	Grose, Michael	LTD should let the public vote on it. (4)
109	8/22/2012	Hamill, Dean	Taxpayer funds should not be spent on this project that will not benefit the city. (4, 13)
109	8/22/2012	Hamill, Dean	More important infrastructure projects need attention. (8)
109	8/22/2012	Hamill, Dean	Don't burden us with projects that will cost millions in upkeep. (6)
110	8/22/2012	Hancock, Carolyn	The 4-4 vote by the City Council shows low support for the extension. Even an LTD Board member voted against it. (2)
110	8/22/2012	Hancock, Carolyn	There is no need for this boondoggle. (1)
111	8/29/2012	Hancock, Carolyn / Dave	We oppose the EmX project. (1)
111	8/29/2012	Hancock, Carolyn / Dave	This is not needed and costs too much. (6, 9)
111	8/29/2012	Hancock, Carolyn / Dave	Stop spending money we do not have. Federal money is my tax money. (4, 8)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
111	8/29/2012	Hancock, Carolyn / Dave	The project will harm businesses. (19, 20)
112	8/29/2012	Hansen, Nancy	Lost road frontage and construction will harm businesses. (19, 20)
112	8/29/2012	Hansen, Nancy	LTD should let the people vote on it. (4)
112	8/29/2012	Hansen, Nancy	Signs all over Eugene show that citizens are upset that their voices were neither heard nor considered. (2, 10)
112	8/29/2012	Hansen, Nancy	I oppose the EmX project. (1)
112	8/29/2012	Hansen, Nancy	There are many more pressing needs in our community. (8)
113	8/22/2012	Hardy, Richard	Project is waste of taxpayers' money. (1)
114	8/28/2012	Hartig, Norman	I oppose the EmX project. (1)
114	8/28/2012	Hartig, Norman	I do not see how it will be of any benefit to the community. (9)
114	8/28/2012	Hartig, Norman	The EmX buses will worsen congestion. (26)
114	8/28/2012	Hartig, Norman	I don't see the ridership increasing because there are not enough real destinations on the west side of town. (37, 39)
114	8/28/2012	Hartig, Norman	It would be cheaper and easier to increase the number of buses in the area. (35)
114	8/28/2012	Hartig, Norman	The project will harm businesses. (19, 20)
115	8/22/2012	Hartley, Hal	We don't need more buses. Let's put money in other things. (1, 8)
115	8/22/2012	Hartley, Hal	EmX costs too much. (6)
116	8/22/2012	Heddinger, Ron	I oppose this unneeded project. (1)
116	8/22/2012	Heddinger, Ron	I see regular and EmX buses running nearly. (37)
116	8/22/2012	Heddinger, Ron	Project requires older people to walk farther to catch a bus. (16)
117	8/26/2012	Heiss, Dylan	I oppose the EmX project. (1)
117	8/26/2012	Heiss, Dylan	The majority of businesses are completely against it. (2)
117	8/26/2012	Heiss, Dylan	The project is not financially acceptable. (6, 8)
117	8/26/2012	Heiss, Dylan	The project will hurt small businesses in a poor economy. (19, 20)
118	8/25/2012	Hemphill, Robert	LTD should not increase our national debt for an unneeded project. (1, 8)
119	8/29/2012	Hesch, Allan	EmX is the wrong concept for a city the size of Eugene. (9, 39)
119	8/29/2012	Hesch, Allan	We need more bus coverage, not fewer faster buses. (35)
120	8/29/2012	Hibberd, Charles	LTD bus service on West 11th has mostly empty buses. (36)
120	8/29/2012	Hibberd, Charles	West 11th's low-density businesses do not have large workforces; workers will not use buses like U of O students use EmX. (33, 37)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
120	8/29/2012	Hibberd, Charles	We should only spend this amount of money if the infrastructure is needed. (6, 9)
120	8/29/2012	Hibberd, Charles	The West 11th EmX is not financially viable or sustainable; LTD cannot meet its budget now, even though it has cut services. (5)
120	8/29/2012	Hibberd, Charles	Please stop this spending binge on things we do not need. (1)
120	8/29/2012	Hibberd, Charles	Eugene is too small a city to afford these big dream items. (9, 39)
121	8/23/2012	Hollingshead, Michael	I oppose the EmX project as a waste of taxpayer money. (1)
121	8/23/2012	Hollingshead, Michael	LTD should let the people vote on it. (4)
122	8/28/2012	Hooker, Dennis	EmX will cause congestion and safety problems. (26)
122	8/28/2012	Hooker, Dennis	This project may shut down my business of nearly 30 years. (19, 20)
123	8/29/2012	How, Dennis	What happened to TSM? (10)
124	8/29/2012	Hruby, Stanley	I oppose EmX for many reasons. (1)
124	8/29/2012	Hruby, Stanley	There is no money to build or support the project. (5, 6, 8)
124	8/29/2012	Hruby, Stanley	Buses on West 11th are never full. (36)
124	8/29/2012	Hruby, Stanley	The buses now cause slowdowns and accidents. EmX will worsen it. (26)
124	8/29/2012	Hruby, Stanley	EmX will force cuts to existing bus service. (5)
125	8/28/2012	Huff, J	Project costs are too much for the current financial situation. (1, 6)
126	8/1/2012	Hutson, Pauline	LTD needs to be audited before receiving federal funds. LTD is not fiscally stable. (5) [with attachments]
126	8/1/2012	Hutson, Pauline	Walker report not provided to LTD Board or public for consideration. (11, 27) [with attachments]
126	8/1/2012	Hutson, Pauline	Total operating costs are not included in cost calculations. (6) [with attachments]
126	8/1/2012	Hutson, Pauline	LTD should have chosen a different EmX corridor. West 11th is a valuable auto-oriented business corridor. (39) [with attachments]
126	8/1/2012	Hutson, Pauline	LTD has never proven the need for EmX. (9) [with attachments]

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
126	8/1/2012	Hutson, Pauline	The project is not wanted by majority of residents. (2) [with attachments]
126	8/1/2012	Hutson, Pauline	EA is inappropriate given the magnitude of this project. (11) [with attachments]
126	8/1/2012	Hutson, Pauline	EmX will cause land and property values to decline, and harm the economy. Removing / relocating businesses would economically devastate the businesses in the area and their employees. (29, 30) [with attachments]
126	8/1/2012	Hutson, Pauline	West Eugene redevelopment is 20 years away; there is not enough ridership to justify the project. The projected population increase cannot be accommodated because of limited land for development, protected wetlands and unstable soils. (3, 33, 37) [with attachments]
126	8/1/2012	Hutson, Pauline	WEEE will not generate enough fare revenue to meet financial needs of route. (5, 6, 40) [with attachments]
126	8/1/2012	Hutson, Pauline	Tax money should pay for other things (law enforcement and infrastructure improvements). (8) [with attachments]
126	8/1/2012	Hutson, Pauline	Project should not be built while LTD is reducing regular bus service – affecting elderly, disabled, families with children, those with no vehicles and low income persons. (5, 16) [with attachments]
126	8/1/2012	Hutson, Pauline	Spacing stops further apart negatively affects the elderly, the disabled, families with children, those with no vehicles and low income persons. (16, 37) [with attachments]
126	8/1/2012	Hutson, Pauline	LTD has improperly funded public relations and advertising. (45) [with attachments]
126	8/1/2012	Hutson, Pauline	Estimates of wait time and travel time are unrealistic. (3, 42) [with attachments]
126	8/1/2012	Hutson, Pauline	LTD has cut bus service to low-income housing, leaving the neediest without transportation. (16, 17) [with attachments]
126	8/1/2012	Hutson, Pauline	The system needs feeder routes to create true bus service. (35) [with attachments]

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
126	8/1/2012	Hutson, Pauline	West 11th Avenue is part of the state highway system and construction will cause congestion and safety problems. (26) [with attachments]
127	8/20/2012	Iverson, Boyd	There is no documented need for the project. (9)
127	8/20/2012	Iverson, Boyd	The City's draft commercial jobs study shows that the West 11th corridor will never have high-density development. City TRG [Technical Resource Group] does not find that EmX would have any beneficial effect on development along this corridor. (3, 11, 29, 33)
128	8/27/2012	Iverson, Boyd	The EA does not address site specific development constraints. (3, 11, 29, 30) [with attachments]
128	8/27/2012	Iverson, Boyd	The EA ignored Envision Eugene Commercial Jobs Analysis of issues regarding the development potential and constraints along this corridor. (3, 11, 23)
128	8/27/2012	Iverson, Boyd	Envision Eugene Commercial Jobs Study contradicts EA job creation claims, and City's Commercial Lands Study Analysis says there is no purpose and need for EmX in Corridor. (3, 9, 11, 33)
128	8/27/2012	Iverson, Boyd	The existing bus system can handle projected ridership. (36)
128	8/27/2012	Iverson, Boyd	The EA doesn't show that the purpose and need will be met. (9, 11)
128	8/27/2012	Iverson, Boyd	LTD should use our tax dollars for a transportation project that has a purpose and need. (1, 9)
128	8/27/2012	Iverson, Boyd	The EA will negatively affect some 470 businesses. (29, 30)
129	8/27/2012	Iverson, Boyd	EA does not adequately address the project's impacts to trees and underestimates the impacts to air quality, earth cooling, and urban wildlife caused by tree removal. (3, 11, 29)
129	8/27/2012	Iverson, Boyd	Mitigation for trees removed is inadequate. (32)
130	8/27/2012	Iverson, Boyd	We need sensible transit service sized to fit the needs of the community. (33, 39)
130	8/27/2012	Iverson, Boyd	EA projections are inconsistent with City of Eugene's own Commercial Lands Study. (3, 33)
130	8/27/2012	Iverson, Boyd	Existing buses are not running near capacity and can accommodate projected ridership need. (36)
130	8/27/2012	Iverson, Boyd	Ridership numbers are inaccurate and inconsistent with population projections and national ridership statistics. (3, 37)
131	8/27/2012	Iverson, Boyd	The EA analysis and findings conflict with Envision Eugene Technical Report projections and conclusions. (33)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
131	8/27/2012	Iverson, Boyd	Existing transit service can handle all current and projected growth. (36)
131	8/27/2012	Iverson, Boyd	The EA’s vacant/ redevelopable land data, assumptions and analysis are incorrect. Can’t find LTD studies supporting developable and redevelopable lands data and analysis. (3, 11, 12)
131	8/27/2012	Iverson, Boyd	West 11th is auto-oriented, with zoning and environmental constraints, making it unlikely for “high density” development or redevelopment. (39)
131	8/27/2012	Iverson, Boyd	Negatively affecting 470 auto-oriented businesses does not “enhance” property values. (29, 30)
131	8/27/2012	Iverson, Boyd	The project’s stops are too far apart. (37)
131	8/27/2012	Iverson, Boyd	Project is all about the “free” \$100 million in government money that LTD can get if they build this system. (4)
131	8/27/2012	Iverson, Boyd	The project will block access to businesses. (18, 19, 20)
131	8/27/2012	Iverson, Boyd	No definition of what “high capacity transit service” is. (31)
131	8/27/2012	Iverson, Boyd	The EA does not support or document findings regarding “No-Build Alternative”. (11)
131	8/27/2012	Iverson, Boyd	EA does not account for other costs such as EWEB having to relocate and bury existing services, having police ride the buses and also station themselves at the major transfer stations to limit drug dealings, additional road maintenance costs, 20 years of continued maintenance of the replacement trees. EmX project not fiscally responsible or sustainable. (4, 6)
131	8/27/2012	Iverson, Boyd	The EA inaccurately describes the impacts to natural resources and destruction of vegetation. (29, 32)
131	8/27/2012	Iverson, Boyd	EmX will create more congestion. (26)
131	8/27/2012	Iverson, Boyd	Walker study states that proposed EmX actually “is a longer route than what it takes a vehicle to reach this area” and that the proposed EmX “takes more time than the existing bus service to this area”. (27)
131	8/27/2012	Iverson, Boyd	The EA does not state how EmX will accomplish the goal of increasing transit share trips. (37, 38)
131	8/27/2012	Iverson, Boyd	EA inaccurately describes the alternatives’ effects on density and nodal development along major corridors. (3, 11, 33)
131	8/27/2012	Iverson, Boyd	EA falsely says that LPA is better than No-Build alternative at meeting the purpose of the project. (3, 9, 11)
131	8/27/2012	Iverson, Boyd	EA falsely says that the LPA also achieves land use and transportation goals, catalyzes economic opportunities, and protects environmental resources. (3, 11, 29)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
131	8/27/2012	Iverson, Boyd	[Comments on Walker report.] (27)
131	8/27/2012	Iverson, Boyd	No-Build Alternative is a more cost-efficient solution. (36)
131	8/27/2012	Iverson, Boyd	Existing bus service could be improved, modified, and better marketed to satisfy demand. (35)
131	8/27/2012	Iverson, Boyd	LTD failed to talk to riders and businesses along the routes. (14)
131	8/27/2012	Iverson, Boyd	LTD wrongly paid a public relations/advertising firm to convince people to support the project. (45)
131	8/27/2012	Iverson, Boyd	LTD is using unproven, new buses with no long term track record, yet is sure that their “operating costs” will be less expensive than existing buses; moreover, LTD doesn’t account for replacement and maintenance costs. (6)
131	8/27/2012	Iverson, Boyd	No such thing as “just compensation” for LTD’s taking business property which would substantially affect the viability of the business that the land is being taken from. EmX will remove very substantial on-street parking areas for several hundred businesses, which is critical to the success of any business, and no compensation will be given for this. (18, 20, 22, 29)
131	8/27/2012	Iverson, Boyd	“Appraised land value” does not take into account business loss or destruction due to this taking. (30)
131	8/27/2012	Iverson, Boyd	EA misstates impacts of tree removal and potential for mitigation. (3, 29, 32)
131	8/27/2012	Iverson, Boyd	EmX is not going to reduce greenhouse gases. (29, 42)
131	8/27/2012	Iverson, Boyd	[Comment about impacts to minority and low-income populations.] (17)
132	8/27/2012	Iverson, Boyd	[Comment about Walker report and density/population.] (27) [with attachments]
132	8/27/2012	Iverson, Boyd	EA contradicts the TRG report, which determined that there would be “no net gain” or even possibly there would be a “loss of jobs” from any redevelopment in this area. Eugene’s Commercial Jobs Study Technical report state that the proposed EmX project is not needed to spur development and EmX will not assist in any way. (3, 33) [with attachments]
132	8/27/2012	Iverson, Boyd	“Several employment centers” stated in EA do not exist. (3) [with attachments]
132	8/27/2012	Iverson, Boyd	Most of this corridor consists of 470 small businesses which are not transit oriented or dependent. Mixed residential / commercial uses being “envisioned by LTD” are not compatible with the large amount of existing Industrial-zoned land and

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
			businesses in this area. (39) [with attachments]
132	8/27/2012	Iverson, Boyd	EA falsely states that “there is a growing residential population” in this area. (3, 11, 29) [with attachments]
132	8/27/2012	Iverson, Boyd	No study shows that adding buses to West 11th will reduce congestion, or increase safety. (3, 11, 23, 26) [with attachments]
132	8/27/2012	Iverson, Boyd	Existing buses are below capacity and can handle expected growth in this area. (36) [with attachments]
132	8/27/2012	Iverson, Boyd	No study documents that BRT has benefited development, either in Oregon or elsewhere. EA falsely cites 600 acres of vacant and or redevelopable land in the corridor. (3, 11, 12) [with attachments]
132	8/27/2012	Iverson, Boyd	No studies support project statement of need. (9) [with attachments]
132	8/27/2012	Iverson, Boyd	Project will hurt businesses by effectively blocking easy access and egress. (20) [with attachments]
132	8/27/2012	Iverson, Boyd	EmX stops are spaced too far apart. (37) [with attachments]
132	8/27/2012	Iverson, Boyd	Deteriorating public transportation along this corridor has been caused by LTD cutting bus service to this area. (35) [with attachments]
132	8/27/2012	Iverson, Boyd	Stop spacing is hard for disabled and elderly people and others. (17, 37) [with attachments]
132	8/27/2012	Iverson, Boyd	There is nothing “fiscally stable” about this system. (5) [with attachments]
132	8/27/2012	Iverson, Boyd	EmX construction will hurt many businesses. (19) [with attachments]
132	8/27/2012	Iverson, Boyd	EmX will hurt businesses by taking on-street parking. (18) [with attachments]

<i>Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)</i>			
Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
133	8/27/2012	Iverson, Boyd	EA contradicts Envision Eugene's Commercial Employment Supply Draft Technical Report. (11, 33) [with attachments]
133	8/27/2012	Iverson, Boyd	EA's redevelopable lands analysis is undocumented. (3, 11, 12) [with attachments]
133	8/27/2012	Iverson, Boyd	LTD created EmX proposal without consulting with any of the 470 businesses located along the proposed route. (14) [with attachments]
133	8/27/2012	Iverson, Boyd	No development constraints were researched for various parcels. (11, 29, 30) [with attachments]
134	8/27/2012	Iverson, Boyd	EA did not consider land with hydric soils or flood plain as "constricted" or too expensive to develop. (11, 29, 30) [with attachments]
134	8/27/2012	Iverson, Boyd	[Comment about zoning, redevelopment potential, 1987 Metro Plan.] (4, 11, 33) [with attachments]
134	8/27/2012	Iverson, Boyd	The City has no idea what incentives would spur redevelopment. (4) [with attachments]
134	8/27/2012	Iverson, Boyd	Don't waste precious tax dollars on a proposal that absolutely has no merit and no documented need. (9, 13) [with attachments]
135	8/28/2012	Iverson, Boyd	[Lengthy criticism of Walker study, especially (but not only) its failure to consider City's Commercial Land Study (March 2012).] (27) [with attachments]
135	8/28/2012	Iverson, Boyd	Existing bus system is capable of handling increase in transit ridership. (35, 36) [with attachments]
135	8/28/2012	Iverson, Boyd	Zoning and market do not exist for the types of businesses "envisioned by LTD" to relocate to West 11th. (33) [with attachments]
135	8/28/2012	Iverson, Boyd	Auto-oriented business makes sense in the Corridor. (39) [with attachments]

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
135	8/28/2012	Iverson, Boyd	The only viable, sustainable, fiscally responsible, environmentally beneficial and bus rider and business friendly alternative is TSM. (6, 11) [with attachments]
135	8/28/2012	Iverson, Boyd	Work with existing businesses , not against them (14, 20) [with attachments]
135	8/28/2012	Iverson, Boyd	Instead of project, should work on existing bottlenecks in the system, which City of Eugene is doing. (26) [with attachments]
136	8/24/2012	Jenks, Chris	LTD should let the people vote on it. (4)
136	8/24/2012	Jenks, Chris	EmX is another taxpayer funded social program. (38, 40)
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	The project is a bad investment. (1) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	LTD has never articulated an underlying transportation need that justifies any action at all. (9, 10) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	The project’s operating costs are significantly underestimated, while projected ridership and revenues are significantly overestimated. (3, 5, 6, 37) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	The project threatens to operate at a loss, consuming far more than its share of LTD’s budget and not worthy of FTA funding. (4, 6) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	The project is bad for the environment and the community. (9, 13, 29, 30) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	The EA fails to provide the transparent public process required by NEPA. (14, 15, 17) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	The EA ignores what the AA identified as the preferred routing alternative along 11th and 13th Avenues, analyzing instead a longer and more costly alternative. (10) [with attachments]

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	The EA acknowledges that the project will have significant adverse impacts on several different resource categories, but does not explain how those impacts would be mitigated, thereby precluding the issuance of a mitigated FONSI. (29, 32) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	EA reads like a document that was prepared to support LTD's predetermined conclusion that the WEEE should be constructed along a route that was already designated as "locally preferred," rather than like a document that is meant to support informed agency decision-making. (10, 11, 13) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	[Comments about the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) and FTA funding criteria.] (4, 11, 15) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	The project is not justified based on transit supporting land use and is not cost-effective. (6, 10, 33) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	[Comment about Small Starts funding criteria.] TSM strategies have significantly lower costs and can greatly improve the efficiency of the road system. (4, 6, 10) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	Key financial questions associated with the project have not been addressed by LTD's analysis, in the EA or elsewhere. (3, 5) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	[Comment criticizing EA's failure to address Small Starts program requirements.] (4, 10) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	Cost and revenue information publicized by LTD as part of the EA process is highly suspect for a number of reasons. (3, 6, 37) [with attachments]

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	EA does not explain how the project would be consistent with regional plans for “nodal development.” It does not assess the degree to which the project is integral to execution of the nodal development locations or clearly explain how the project will result in expanded nodal development. [Comment relating to FTA funding requirements.] (29, 33) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	EA failed to make available good information regarding the potential impacts of the project to public officials and citizens before decisions were made and actions taken. It did not concentrate on issues that were truly significant to the action in question, instead amassing needless detail. (12, 14, 15) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	FTA must ensure that the work necessary to prepare a NEPA-compliant FONSI or Record of Decision (ROD) has been performed. (3, 6, 9, 10, 11, 12, 14, 15, 17, etc.) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	FTA must independently review and evaluate the EA to ensure that it clearly and fairly discloses all information about the WEEE’s impacts and alternatives. The WEEE EA fails to satisfy the requirements of NEPA in a number of respects. (3, 6, 9, 10, 11, 12, 14, 15, 17, etc.) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	LTD improperly predetermined the outcome of the EA analysis in order to select the desired alternative. FTA has failed to conduct any meaningful independent analysis of the proposed project, alternatives, or impacts. (3, 6, 9, 10, 11, 15, 23, 25, 26, 28, 29, 32) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	LTD improperly used an outside public relations firm to advocate for the project. (45) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	FTA must ensure that the EA process is open to the public in a way that LTD’s process was not. By breaking its process into numerous steps that took place over the course of several years, LTD sought to minimize public opposition to the WEEE project as a whole. (2, 9, 10, 11, 14) [with attachments]

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	The EA document does not provide a clear and concise explanation of the agency’s decision making process, and relies on massive and unreadable appendices. That is not the sort of public, transparent decision-making that the NEPA process is supposed to encourage. (11, 12, 14) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	The EA’s statement of purpose and need is ill-defined and confusing. Because the purpose was narrowly defined as the implementation of high-capacity public transportation, the meaningful consideration of other alternatives to address the underlying need for the project was arbitrarily and unreasonably rejected. (9, 10, 11) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	The project will worsen traffic by taking traffic lanes to support the BRT system. (3, 15, 26) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	Traffic signal prioritization and minor intersection improvements could significantly improve traffic flow at much less cost than the project, and would avoid impacts on local businesses and residences. (6, 10, 20, 23, 29) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	The EA inadequately explains why some alternatives were rejected from further consideration. It instead summarily dismisses them for a variety of vague reasons. It doesn’t cite any document which would further explain the decision to eliminate the TSM Alternative. (6, 9, 10, 11, 12) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	Walker concluded that the LPA was “dramatically inferior” to the West 11th/13th Avenues alternative recommended in the AA Report. LTD’s Walker Report appears nowhere in the EA or its appendices. (11, 27) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	The EA improperly considers only the No-Build Alternative and the LPA. Further, the project purpose makes the selection of the LPA a foregone conclusion. (9, 10, 11) [with attachments]

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	The EA relies on inaccurate and incomplete information in its analysis of impacts and summarily concludes that the LPA will not result in any significant adverse impacts. It fails to meaningfully analyze direct, indirect and cumulative impacts. (3, 11, 29, 32) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	The EA does not clearly communicate the relationship between the large scale of the proposed BRT investment and the small population and employment growth within a half-mile of the corridor. (3, 4, 11, 29, 33) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	The EA fails to meaningfully assess the potential impacts to minority-owned businesses. (11, 17, 18, 19, 20, 29) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	The EA does not explain how construction impacts will be mitigated. (19, 29, 30, 32) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	The EA fails to address direct, indirect or cumulative impacts to freight movements on Highway 126/99. (3, 11, 23, 25) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	Given the inadequacies of the EA outlined in this comment, it would be arbitrary and capricious for FTA to conclude that the proposed WEEE would not have a significant impact on the human environment. The mitigation measures in the EA are insufficient to support a FONSI. (3, 11, 29, 32) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	The EA fails to explain why FTA decided that an EIS was not necessary, or to acknowledge that FTA had previously indicated its intent to prepare an EIS. (9, 11) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	The process followed by LTD in evaluating the proposed WEEE is fatally flawed, and does not provide an adequate basis for agency decision-making. (2, 3, 10, 11, 14, 15, 17, 23, etc.) [with attachments]
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	There is no credible evidence in the EA that the WEEE project is needed, that it will ever be self-sustaining, or that it will benefit the community. (3, 6, 9, 13) [with attachments]

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
137	8/29/2012	Johnson, Jay and Floyd, Kathryn / OMOT	LTD, for reasons unknown, has selected a route for the WEEE that makes problems worse. It offers only vague assurances that those impacts will be adequately mitigated. (10, 29, 32) [with attachments]
138	8/25/2012	Kay, Mariann	I oppose the EmX project. (1)
138	8/25/2012	Kay, Mariann	The project will harm businesses and property owners on West 11th. (19, 20, 22)
138	8/25/2012	Kay, Mariann	The EmX is never even half full. (36)
139	8/29/2012	Keith, Donovan	EmX will limit access to businesses both during and after construction. Customers of these businesses will go elsewhere to avoid the construction and the chaos that goes with it. There is no compensation set aside for those businesses, causing them to close or even move. (19, 20)
140	8/29/2012	Knepler, James	EmX has no practical value for moving large groups of people efficiently. (37)
140	8/29/2012	Knepler, James	What you are doing to the human environment, to the community, is destructive in both the long and the short run. (1)
140	8/29/2012	Knepler, James	I oppose the EmX project. (1)
141	8/30/2012	Kohler, William Lee	LTD should let the people vote on it. (4)
142	8/29/2012	Koleszar/Givens, Ilona	I do not believe LTD's estimate of costs to build or operate this project. Other services will be cut to meet deficits. (6)
142	8/29/2012	Koleszar/Givens, Ilona	The purpose and need statement is composed of words and phrases that can be used to support whatever LTD wishes. (9)
142	8/29/2012	Koleszar/Givens, Ilona	The impacts on business and property owners are inaccurately assessed and considered. (11, 29)
142	8/29/2012	Koleszar/Givens, Ilona	LTD has failed to compare alternatives in its analyses including no-build, TSM and streetcars. (10)
143	8/29/2012	Koleszar/Givens, Ilona	[Letter 143 is substantively identical to Letter 142.]
144	8/29/2012	Kryl , Peter	I oppose the EmX project. (1)
144	8/29/2012	Kryl , Peter	The project is too expensive. (6)
144	8/29/2012	Kryl , Peter	The project will hurt too many businesses. (19, 20)
144	8/29/2012	Kryl , Peter	The project construction will cause mayhem. (19)
144	8/29/2012	Kryl , Peter	I am skeptical of the population forecasts. (33)
144	8/29/2012	Kryl , Peter	LTD can't afford the existing service. (5)
145	8/24/2012	Landers, Gordon	I oppose this unnecessary project. (1)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
145	8/24/2012	Landers, Gordon	The people who live and work in the proposed area don't want it. (2)
145	8/24/2012	Landers, Gordon	The project wastes taxpayers' money. (6)
146	8/29/2012	Larew, Nick	I oppose the EmX project. (1)
147	8/2/2012	Lemler, Becky	I oppose the EmX project. (1)
147	8/2/2012	Lemler, Becky	Majority of interested residents do not favor it. (2)
147	8/2/2012	Lemler, Becky	The project is inefficient, and will not support itself. (6)
147	8/2/2012	Lemler, Becky	Other community needs are greater. (8)
147	8/2/2012	Lemler, Becky	The project will cause more traffic congestion. (26)
147	8/2/2012	Lemler, Becky	The project will cause more air pollution. (29)
147	8/2/2012	Lemler, Becky	The project will increase driver frustration and commute time. (26)
147	8/2/2012	Lemler, Becky	The project will harm businesses by taking their road front property. (19, 20)
147	8/2/2012	Lemler, Becky	The project removes established trees. (29)
147	8/2/2012	Lemler, Becky	This is the wrong solution for West Eugene transit issues. (39)
148	8/22/2012	Lemler, Becky	The project should not be forced onto the taxpayers' backs. (4)
149	8/29/2012	Lowe, Shirley	The project is a waste of time and money! (1)
149	8/29/2012	Lowe, Shirley	The project will worsen congestion. (26)
150	8/26/2012	Lowell, Cynthia	The project will waste tax dollars. (1, 6)
150	8/26/2012	Lowell, Cynthia	LTD should value my opinion and input. (2)
150	8/26/2012	Lowell, Cynthia	The project will cause a huge traffic problem. (26)
151	8/26/2012	Lowell, Scott	This project is not wanted or needed. (2, 9)
151	8/26/2012	Lowell, Scott	The project is a waste of tax money. (6)
151	8/26/2012	Lowell, Scott	It will cause more traffic problems in both the short and long term. (26)
151	8/26/2012	Lowell, Scott	LTD should let the people vote on it. (4)
152	8/28/2012	Lowtrip, Rhonda	I oppose the EmX project. (1, 6)
153	8/29/2012	Lozar, Barbara	I believe in transit but the project is not a good investment. (1)
153	8/29/2012	Lozar, Barbara	The project disrupts too many businesses. (19, 20)
153	8/29/2012	Lozar, Barbara	The U.S. government is broke and I do not want China owning this country. I do not want the federal money, or my money spent on this project. (1, 4, 8)
153	8/29/2012	Lozar, Barbara	[Suggests route.] (4, 10)

<i>Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)</i>			
Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
154	8/29/2012	Lozar, David	A lot of people want to spend millions on transit without meeting the transit needs of the people. (4, 6)
154	8/29/2012	Lozar, David	The project will harm businesses along West11th. (19, 20, 22)
154	8/29/2012	Lozar, David	The project will harm transit capabilities of West 11th. (26, 38)
155	8/22/2012	Lozar, Jeff	LTD is big part of the driving force behind this project. Being unelected and having the power to spend other people's money and condemn property leaves the public with little recourse. (1)
155	8/22/2012	Lozar, Jeff	LTD should let the people vote on it. (4)
156	8/22/2012	Lozar, Jeff	Unlike this EmX project public safety is a priority. (8)
157	8/22/2012	Lozar, Jeff	I oppose the EmX project. (1)
157	8/22/2012	Lozar, Jeff	Our city is too small for this system. (39)
157	8/22/2012	Lozar, Jeff	The project does not make sense on West 11th where LTD has cut bus service recently due to lack of ridership. (5, 36)
157	8/22/2012	Lozar, Jeff	The park and ride lot in front of Fred Meyer is rarely used. (43)
157	8/22/2012	Lozar, Jeff	We don't have money; people won't ride the buses. (38)
158	8/29/2012	Lozar, Jeff	The project is too expensive. (6)
158	8/29/2012	Lozar, Jeff	Not needed. (9)
158	8/29/2012	Lozar, Jeff	The best option is the no build option. (1)
159	8/26/2012	Lucas, Carol	People oppose the project among the businesses that it will harm and the drivers that must commute the roads that it will use. (1, 2)
159	8/26/2012	Lucas, Carol	More valuable and necessary programs need those funds. (8)
159	8/26/2012	Lucas, Carol	LTD should let the people vote on it; our business and almost every other west Eugene business oppose the project. (2, 4)
160	8/22/2012	Luckman, Dale	LTD should listen to the people, who oppose the project. (1, 2)
161	8/23/2012	Lyseng, Roger	The project is a waste of money. (1)
162	8/22/2012	Macanley, Ben	I oppose the EmX project. Most of the public supporters of the West Eugene EmX have something to gain. (1, 34) [with attachments]
162	8/22/2012	Macanley, Ben	The majority of the public opposes it. (2) [with attachments]
163	8/28/2012	Macherione, Bob	LTD has overstated the predicted revenue and left expenses off of the financial documents. (5, 6)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
163	8/28/2012	Macherione, Bob	An independent outside accounting firm should be retained to audit LTD. LTD is providing a false financial outlook. With low reserves, LTD's ability to provide basic service becomes vulnerable to moderate fluctuations in fuel prices or shortfalls in payroll tax revenue projections. Reserves are needed to preserve basic bus service elsewhere. (5)
163	8/28/2012	Macherione, Bob	LTD assumptions in the long range financial plan are unrealistically optimistic. The long term financial plan in the approved budget contradicts the EA. It is irresponsible to allow reserves to be kept at such a low level as at least \$1,000,000 is required to be reserved for insurance. LTD continues to defer current operating costs into the future. This risks creating a staggering burden that will collapse the system. LTD builds concrete guideways for its heavy EmX buses but leaves the mixed traffic portion of its routes in asphalt, which will require repeated repairs at great cost to the city. LTD never uses EmX-specific higher cost data and understates the operating costs. When the miles and headways still needed to serve the rest of the route are calculated correctly, all savings vaporize. (3, 5, 6)
163	8/28/2012	Macherione, Bob	Since LTD has failed in the past to operate a basic system, FTA should fund a more deserving less controversial project. (5, 8)
164	8/28/2012	Macherione, Bob	This community deserves responsible, affordable, sustainable transit. It should fit into our neighborhoods without requiring the divisive and expensive infrastructure needed by EmX bus. Most EmX proponents are people who have a direct connection to LTD or would benefit from the construction of EmX. (1, 34, 39)
164	8/28/2012	Macherione, Bob	EmX system requires too much infrastructure to be able to run in any already established area. Thus, it is now relegated to main thoroughfares far from the residences the system should serve. (39)
164	8/28/2012	Macherione, Bob	EmX buses are too massive for a system that runs every 10 minutes. The EmX system is neither fuel efficient nor flexible enough. It wastes massive amounts of fuel when ridership is down in off-peak directions and times. When the ridership drops, it becomes an environmental and economic disaster to run. (35, 39)
164	8/28/2012	Macherione, Bob	LTD plans to take lanes that were built to help all traffic flow. (26)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
164	8/28/2012	Macherione, Bob	LTD could use full system traffic signal prioritization and minor intersection improvements to get the benefit of EmX at 10 percent of the capital cost. Proper transit system management could be used to make all sides happy. (6, 20, 29, 36)
164	8/28/2012	Macherione, Bob	The ridership projections show no need for this extension. (37)
164	8/28/2012	Macherione, Bob	LTD and the city of Eugene have used underhanded tactics to push EmX through over the objections of 45 percent of the community. (2, 45)
164	8/28/2012	Macherione, Bob	LTD used tax dollars to suppress the opposition to its EmX plans. (45)
164	8/28/2012	Macherione, Bob	The city is also spending tax dollars to battle the ACLU over free speech relating to “No EmX” signs. (4)
164	8/28/2012	Macherione, Bob	Public input is the cornerstone of democracy, and LTD, with its unelected board, should never again try to circumvent it. (2, 14, 45)
165	8/29/2012	Macherione, Brenda	LTD cut bus service to low-income housing after implementing Gateway, forcing anyone who lives there to walk over 1.1 miles over an overpass to get bus service. Not addressed in the social justice process of the EA. (5, 14, 17)
166	8/29/2012	Maricle, Joseph	EmX is inconvenient. When you ride it you have to buy a separate ticket from a day pass for the regular bus. (1)
166	8/29/2012	Maricle, Joseph	With the distance between stops that the EmX makes I may as well have walked to where ever I’m going. (37)
167	8/22/2012	Marler, Skip	I oppose the EmX project. (1)
167	8/22/2012	Marler, Skip	The project will harm small businesses. (19, 20)
168	8/29/2012	Martinez, Tommye	I oppose the EmX project. (1)
168	8/29/2012	Martinez, Tommye	6th/7th and 11th are already a nightmare; EmX would worsen it. (25)
168	8/29/2012	Martinez, Tommye	The project will harm small businesses. (19, 20)
169	7/26/2012	Matthew, Craig	Why have public comment? Nothing is going to change. (1, 2, 10)
169	7/26/2012	Matthew, Craig	The majority of the people who care about this are strongly opposed to it. And many others are not even interested at all. (2)
169	7/26/2012	Matthew, Craig	Government cannot force an unwilling landowner to do something with his property that he does not want to do unless an overriding public interest necessitates it. For that purpose there is Eminent Domain. But Eminent Domain should not be abused. (22)
169	7/26/2012	Matthew, Craig	We already have buses that run through West Eugene. (36)
169	7/26/2012	Matthew, Craig	The Federal government is broke. (1)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
170	8/29/2012	Matthews, Kevin / Friends of Eugene and personal	We support appropriate public transportation. The EmX final EIS is fatally flawed and should be sent back for deep reworking. In the statement of Purpose and Need, the phrase “utilizing the adopted high capacity transit mode identified in the Regional Transportation Plan,” is simply unfrank code language for a BRT approach. (3, 9, 11) [with attachments]
170	8/29/2012	Matthews, Kevin / Friends of Eugene and personal	LTD has never documented a full evaluation of an electric rail-based alternative. By failing to consider this alternative, LTD fails to meet the requirements of NEPA. (10) [with attachments]
170	8/29/2012	Matthews, Kevin / Friends of Eugene and personal	The EIS [sic] also fails in terms of carbon footprint analysis. LTD has failed to account for the needed progressive, incremental and accumulating carbon footprint reductions from the present through 2040 or 2050. LTD has ignored the integrated approach to land use and transportation in the West 11th corridor that was mapped out by the West Eugene Collaborative (WEC) (see “A New Vision for West Eugene” (March 2009), attached). (3, 11, 29) [with attachments]
170	8/29/2012	Matthews, Kevin / Friends of Eugene and personal	By approaching transit planning as a solo agency effort, instead of a community project, LTD has limited its EmX plan and LPA to a narrow transportation-oriented solution that provides little upside for land owners, which resulted in extreme community controversy. In service to the community, as well as to meet NEPA and general best practices requirements, as part of this EA, LTD should evaluate and document the net benefits of an integrated land use and transportation alternative, similar to the well-considered WEC proposal. (4, 9, 10, 14, 15, 33) [with attachments]
171	8/22/2012	McGraw, Gordon	The EmX will harm my business and others. It will make my customers travel nearly a mile farther to get to me. (19, 20)
171	8/22/2012	McGraw, Gordon	The project is costly. (6)
172	8/25/2012	Mckee, Drake	LTD should improve the system already in place. (35)
172	8/25/2012	Mckee, Drake	I oppose the EmX project. (1)
173	8/10/2012	McNabb, Melinda	LTD should clean up the budget and address the needs of the majority. (1, 2)
174	8/29/2012	McNutt, JP	I oppose the EmX project. (1)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
174	8/29/2012	McNutt, JP	The condemnation of business properties will be a nightmare. (22)
174	8/29/2012	McNutt, JP	Construction will be a financial burden for business to survive. (19)
174	8/29/2012	McNutt, JP	The project's need has not been proven. (9)
175	8/22/2012	Mehlhoff, LaRae	I oppose the EmX project. (1)
176	8/29/2012	Menke, Marie	I oppose the EmX project. (1)
176	8/29/2012	Menke, Marie	Coburg Road with all of its shopping and restaurants and close proximity to campus would be a better choice. 6th and 7th Avenues have never needed bus service, and now it needs an EmX route? (10)
176	8/29/2012	Menke, Marie	These businesses depend on the automobile. (19, 20, 39)
177	8/27/2012	Meza, Carol	More buses and routes would be acceptable. (35)
177	8/27/2012	Meza, Carol	The cost is not acceptable. (6)
177	8/27/2012	Meza, Carol	The project will harm businesses. (18, 19, 20)
177	8/27/2012	Meza, Carol	The project will have an adverse impact on traffic. (23, 26)
177	8/27/2012	Meza, Carol	I oppose the EmX project. (1)
177	8/27/2012	Meza, Carol	LTD should not spend tax monies for a project that we oppose. (2)
177	8/27/2012	Meza, Carol	LTD should let the people vote on it. (4)
178	8/26/2012	Miller, Bruce	This plan has been a wasteful use of resources. (6)
178	8/26/2012	Miller, Bruce	More bus service would be better. (35)
178	8/26/2012	Miller, Bruce	Congestion has not and will not be reduced. (23, 26)
178	8/26/2012	Miller, Bruce	Service will not be enhanced with fewer stops. (37)
178	8/26/2012	Miller, Bruce	Commerce is done by car or truck. (39)
178	8/26/2012	Miller, Bruce	The project will impede traffic and hurt the economy. (23, 26, 30)
179	8/29/2012	Miller, Nick	Eugene Citizens and taxpayers don't need this financial burden. (1)
180	8/26/2012	Miller, Sherry	The project is a waste of money. (6)
180	8/26/2012	Miller, Sherry	There's not enough room on W. 11th. (26)
180	8/26/2012	Miller, Sherry	What was wrong with the first plan? (10)
181	8/24/2012	Minor, Amanda	The project will clog our streets. (26)
182	8/23/2012	Mitchell, Jackie	LTD should let the people vote on it. (4)
183	8/28/2012	Montgomery, Charles	I support the EmX project. (1)
183	8/28/2012	Montgomery, Charles	Current bus service is adequate. (36)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
183	8/28/2012	Montgomery, Charles	LTD cannot run profitably; our city, county, state and country cannot meet current obligations. (8)
184	8/28/2012	Montgomery, Charles	Change my previous message "we do need it now" to "we don't need it now". (1)
185	8/22/2012	Morana, Dan	I oppose the EmX project. (1)
186	8/29/2012	Morris, Cynthia	West 11th is already bad because the City Council vetoed the people's wishes on the West Eugene Parkway. (4)
186	8/29/2012	Morris, Cynthia	The project will worsen traffic on W. 11th. (26)
186	8/29/2012	Morris, Cynthia	The project will destroy local business. (19, 20)
186	8/29/2012	Morris, Cynthia	Many EmX buses are empty. (36)
187	8/27/2012	Mottahed, Amin	I oppose the EmX project. (1)
187	8/27/2012	Mottahed, Amin	Our current bus system should be augmented. (35)
187	8/27/2012	Mottahed, Amin	Although there is federal money to supplement the cost of the EmX expansion, it is throwing good money after bad. (8)
187	8/27/2012	Mottahed, Amin	I oppose this financially unproved and nonviable project. (1)
187	8/27/2012	Mottahed, Amin	Our current bus system should be augmented instead. (35)
188	8/24/2012	Murphy, Linda	The bus that runs up and down W.11th does the job. (36)
188	8/24/2012	Murphy, Linda	Too many people will lose jobs and shopping on W.11th will not be easy as it is now. (19, 20)
188	8/24/2012	Murphy, Linda	It will break the west side of Eugene. (1)
189	8/22/2012	Murphy, Sara	West Sixth is always bumper to bumper already. (24, 25)
189	8/22/2012	Murphy, Sara	The EmX project will take out the only trees, shade, and landscaping on W 6th and 7th. (29)
189	8/22/2012	Murphy, Sara	The project is a boondoggle. (1)
189	8/22/2012	Murphy, Sara	LTD's own Alternatives Analysis showed the current route to be the worst selection of all studied. What changed the minds of LTD? How can we trust an organization that flip-flops so quickly? (10)
190	8/23/2012	Murphy, Sara	[Letter 190 is identical to Letter 189.]
191	8/24/2012	Murray, Duncan	EmX is inefficient. (37)
191	8/24/2012	Murray, Duncan	The project will disrupt businesses before and after construction. (19, 20)
191	8/24/2012	Murray, Duncan	I oppose the EmX project. (1)
192	8/29/2012	Nates, Seymoor	Closure of lanes on 6th and 7th will cause congestion. Passenger cars and buses can share lanes. (25)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
192	8/29/2012	Nates, Seymoor	Cars sitting at idle through long light cycles, waste energy and resources and pollute the air. (26, 29)
193	8/28/2012	Nelson, Alicia	I oppose the EmX project. (1)
194	8/27/2012	Nichols, David	I oppose the EmX project. (1)
194	8/27/2012	Nichols, David	Project will harm businesses during construction and by increasing congestion and decreasing access. (19, 20)
194	8/27/2012	Nichols, David	Adds to our short- and long-term tax burdens created by project. (1)
195	8/24/2012	Norris, Bill	Traffic is already bad on 6th; taking away a lane will worsen it. (25)
196	8/27/2012	Nottage, Sally / Jim	I oppose the EmX project. (1)
196	8/27/2012	Nottage, Sally / Jim	The project is a waste of money. (6)
196	8/27/2012	Nottage, Sally / Jim	The project is not the correct location for more service. (39)
197	8/28/2012	Of Women Voters, League / Tavakolian, Susan and Boyd, Suzanne	The project will provide significant benefits to the community with only limited and minor adverse impacts. It is time to move forward with the LPA, a well-planned, critical transportation link that will benefit everyone: bus riders, drivers, bicyclists, and pedestrians. (1) [with attachments]
198	8/29/2012	Olin, Cynthia	West 11th Avenue is comprised of auto-oriented businesses and will not be used by transit riders. (39)
198	8/29/2012	Olin, Cynthia	Buses currently running on West 11th are adequate. (36)
198	8/29/2012	Olin, Cynthia	It's probably great for the college student but there are many more citizens than students in this town. (38)
198	8/29/2012	Olin, Cynthia	This project is too expensive. (6)
198	8/29/2012	Olin, Cynthia	We should be more responsible with our spending when we are in such a huge debt/deficit. (4, 8)
198	8/29/2012	Olin, Cynthia	I oppose the EmX project. (1)
199	8/29/2012	Olson, Cynthia	The size of the bus and its required infrastructure is a detriment to picking up residential passengers. This system is out of scale for low-density towns like Eugene. (4, 9, 39)
199	8/29/2012	Olson, Cynthia	LTD admits between 40-60% of ridership is students and there are no real destinations for students in this corridor. (38)
199	8/29/2012	Olson, Cynthia	The ridership will not be there to support EmX. (37)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
200	8/28/2012	OMOT	[Comments primarily related to discussions at a Sept. 2011 LTD Board meeting: policies and procedures of LTD Board; ODOT carpool incentive grant; Schwetz/CH2M Hill grant presentation/exercise; funding of LTD employee benefits; public input received not related to EA; meetings with property owners potentially affected by WEEE; testimony of a transit-dependent rider relating difficulties of getting around since LTD cutbacks.] (1, 4)
200	8/28/2012	OMOT	LTD won't make available financial reports on the increase in maintenance costs for 60-ft buses nor the increase in admin costs while they are negotiating with the bus drivers. (12)
201	8/30/2012	OMOT	[Press release from OMOT: "Your Environmental Assessment is flawed!" Criticizes EA's analysis as short on facts and long on speculation, incomplete and inaccurate; describes OMOT's engagement of independent consultants to assess EA.] (1, 11) [Press release is accompanied by attachments that are identical to Letter 137.]
202	8/27/2012	Palmer, Tom	I oppose EmX proposal because it will have a huge negative impact on my business and property. (1, 19, 20)
202	8/27/2012	Palmer, Tom	The plan will put a station directly in front of my business and close off the main entrance to my property from 7th Avenue. It would be a huge impact to customers that use that access all day long. (19, 20)
202	8/27/2012	Palmer, Tom	Left turn on to Charnelton, a major traffic corridor, will be severely impacted for the normal flow of traffic. (26)
203	8/30/2012	Pearson, Roberta	I oppose the EmX project. (1)
203	8/30/2012	Pearson, Roberta	The project is a waste of money. People won't use it because they need their cars. (6, 37, 39)
203	8/30/2012	Pearson, Roberta	Many businesses can't afford to lose more land or parking. (18, 19, 20)
204	8/22/2012	Pease, Russ	The money to fund EmX comes from curtailing the local runs that in the past have assisted us in comfortably getting across town when we try the bus. (5)
204	8/22/2012	Pease, Russ	The project will add congestion to main travel arteries. (23, 26)
205	8/28/2012	Perkins, Kim	I oppose EmX on 6th/7th and West 11th Avenue because it's already busy enough on those streets (25, 26)
206	8/28/2012	Perkins, Mark	I oppose the EmX project. (1)
206	8/28/2012	Perkins, Mark	Don't need another bottleneck. (25, 26)
207	8/12/2012	Pilkenton, Casey	LTD should let the people vote on it. (4)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
207	8/12/2012	Pilkenton, Casey	The EmX on Franklin has hurt my business during construction and after construction. (21)
207	8/12/2012	Pilkenton, Casey	EmX brings in a lot of foot traffic who only use the restroom and ask for directions, or loiter. This affects the efficiency of my employees, and many of the people who get off the EmX there are questionable and intimidating to my staff, especially at night. It's not fair or right to affect Eugene businesses who have contributed so much to our local economy, without some say in the matter. (20)
208	7/23/2012	Postles, Annabelle	What North/South street would the EmX would be using? (41)
209	8/22/2012	Poyski, Greg	Let the public vote on this EmX. (4)
209	8/22/2012	Poyski, Greg	More small buses and more routes would better serve the people. (35)
210	8/22/2012	Prociw, Kevin	I oppose the EmX project. (1)
210	8/22/2012	Prociw, Kevin	Comments opposed to this project will not be considered or have any affect. (2)
210	8/22/2012	Prociw, Kevin	Ridership does not justify a full EmX build-out. (37)
210	8/22/2012	Prociw, Kevin	Eugene needs a bus system that can scale with its growth. (39)
210	8/22/2012	Prociw, Kevin	EmX will worsen congestion on West 11th. (26)
210	8/22/2012	Prociw, Kevin	LTD should re-evaluate EmX and consider other options. (10, 39)
211	7/17/2012	Quiqley, Mike	I support the EmX project. (1)
212	8/26/2012	Race, Ken	I oppose the EmX project. (1)
213	8/26/2012	Radway, Kay	I oppose the EmX project. (1)
213	8/26/2012	Radway, Kay	EmX would cause severe congestion on already busy streets. (26)
213	8/26/2012	Radway, Kay	LTD is not honest about cost. (6)
213	8/26/2012	Radway, Kay	Many businesses will be affected. (18, 19, 20)
213	8/26/2012	Radway, Kay	There are better locations for EmX. (10, 39)
214	8/26/2012	Rarick, Dan	EmX will cause more congestion and accidents on an already troubled road. (26)
215	8/22/2012	Ray, Kevan	There is not enough demand for BRT on W 11th/6th/7th. (37)
215	8/22/2012	Ray, Kevan	I oppose the EmX project. (1)
216	8/26/2012	Rayhorn, Debra	West end ridership doesn't warrant a traffic problem with buses. (26, 37)
216	8/26/2012	Rayhorn, Debra	I oppose the EmX project. (1)
217	8/26/2012	Rayhorn, Ken	The buses are empty; we don't need more to congest our busy streets. (26, 36, 37)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
218	8/22/2012	Reed, Hal	A perfectly good bus system already exists. (36)
218	8/22/2012	Reed, Hal	EmX will disrupt and destroy businesses. (18, 19, 20)
219	8/29/2012	Reed, Larry	I support the EmX project. The City of Eugene and LTD has done a good job in listening and mitigating the project impacts. A small but highly visible group should not overrule the needs and plans of the community; or derail adopted community plans. The Envision Eugene planning work continues to propose that most density/ growth will occur along mass transit corridors. TransPlan identifies BRT as the preferred transit system for major corridors. (1, 2, 4, 14, 39) [with attachments]
220	8/26/2012	Rhodes, Sheri	Construction would harm businesses along West 11th. (19)
220	8/26/2012	Rhodes, Sheri	I oppose the EmX project. (1)
221	8/29/2012	Richards, Danny	There are other solutions to the transportation needs but City Council fails to pursue those options. (10, 14, 39)
222	8/29/2012	Richards, Danny	LTD's traffic study contradicts the 1987 report that showed a need for 4 full lanes on 6th and 7th. (24)
223	8/26/2012	Riley, Steve	What happens when the Federal money runs out and LTD's regular funds must pay the bill? (5)
223	8/26/2012	Riley, Steve	Stop the wasteful spending of my tax dollars. (6)
224	8/27/2012	Rineer, Bruce	Fix our existing roads before building another empty bus system. (8)
225	8/8/2012	Robinowitz, Mark	The EA contains insufficient documentation of project cost. (5) [with attachments]
225	8/8/2012	Robinowitz, Mark	NEPA states that the decisions in an environmental document cannot be made with proprietary data not subject to public review, nor incomplete information that is relevant to the project. (3, 10, 11, 12, 14, 15) [with attachments]
225	8/8/2012	Robinowitz, Mark	EA needs to account for peak oil limitations on transportation. (7) [with attachments]
226	8/29/2012	Robinowitz, Mark	I oppose the EmX project. (1) [with attachments]

<i>Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)</i>			
Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
226	8/29/2012	Robinowitz, Mark	The project is very expensive for a bus lane partly in mixed traffic, especially since giant bridges and overpasses are not included. (6) [with attachments]
226	8/29/2012	Robinowitz, Mark	The EA did not include details for the cost estimates. (11) [with attachments]
226	8/29/2012	Robinowitz, Mark	The EmX study uses the Lane Council of Government's (LCOG's) traffic model for predicting traffic trends, even though LCOG's estimates have been wildly inaccurate. (3) [with attachments]
226	8/29/2012	Robinowitz, Mark	LCOG, LTD, ODOT and other transportation agencies refused to consider that oil prices might rise as we reach "Peak Oil," the point where oil production reaches the maximum point; nor did they consider other consequences of reaching "Peak Oil." (3, 7) [with attachments]
227	8/28/12	Robinowitz, Mark	Peak Electricity: coal, gas, uranium are all peaking (1, 7)
228	8/29/2012	Robinowitz, Mark	[Submitted copy of a request for Supplemental Draft EIS on Columbia River Crossing Final EIS based on assumptions about projected increase in Vehicles Miles Traveled; and other attachments. No comments about West Eugene EmX Project were made in the email communication.] (1) [with attachments]
229	8/29/2012	Robinowitz, Mark	I oppose the EmX project. (1) [with attachments]
229	8/29/2012	Robinowitz, Mark	City of Eugene rubberstamped more big boxes even after initial planning was underway for West 11th EmX. (4) [with attachments]
229	8/29/2012	Robinowitz, Mark	West Eugene EmX is too expensive for a bus lane that is partly in mixed traffic. (6) [with attachments]
229	8/29/2012	Robinowitz, Mark	EA did not include details for the price tag. (11) [with attachments]
229	8/29/2012	Robinowitz, Mark	LTD did not make project information and details available. (3, 10, 11, 12, 14, 15) [with attachments]
229	8/29/2012	Robinowitz, Mark	The EmX study uses the LCOG's traffic model for predicting traffic trends, even though LCOG's estimates have been inaccurate. (3) [with attachments]

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
229	8/29/2012	Robinowitz, Mark	LCOG, LTD, ODOT and other transportation agencies refused to consider that oil prices might rise as we reach "Peak Oil," the point where oil production reaches the maximum point. (7) [with attachments]
230	8/29/2012	Robinowitz, Mark	[Submitted copies of articles regarding interconnected crises of peak oil, climate chaos, overpopulation, and resource conflicts. No comments were made on the WEEE project.] (1) [with attachments]
231	8/29/2012	Robinowitz, Mark	[Submitted copies of project's cost estimating sheets from 10-13-11. No comments were made on the WEEE project.] (1) [with attachments]
232	8/22/2012	Robson, Mike	This project is going to cost an enormous amount of money both federal and local. (6)
232	8/22/2012	Robson, Mike	LTD should let the people vote on it. (4)
233	8/29/2012	Rogers, Ryan	I own The Fisherman's Market and oppose the EmX project. (1)
234	8/3/2012	Rohter, Scott	Why have public comment? Nothing is going to change. (1, 2, 10)
234	8/3/2012	Rohter, Scott	The majority of the people who care about this are strongly opposed to it. And many others are not even interested at all. (2)
234	8/3/2012	Rohter, Scott	It violates private property rights to force an unwilling landowner to do something with his property that he does not want to do without an overriding public interest that necessitates it. (22)
234	8/3/2012	Rohter, Scott	We already have buses that run through West Eugene. (36)
234	8/3/2012	Rohter, Scott	The Federal government is broke. (8)
235	8/29/2012	Rommel, Kristopher	Adverse impacts to businesses include loss of existing jobs and decrease in number of businesses; this cannot be balanced by handful of temporary jobs. (19, 20)
236	8/29/2012	Rosenthal, Nola	I oppose the EmX project. (1)
237	8/29/2012	Rosenthal, Roger	I oppose the EmX project. (1)
238	8/28/2012	Rouleau, Winifred	[Letter 238 identical to Letter 234 – see responses above.]
239	8/24/2012	Rowlett, Joni	EmX would be disastrous to business owners. (18, 19, 20)
239	8/24/2012	Rowlett, Joni	I oppose the EmX project. (1)
239	8/24/2012	Rowlett, Joni	West 11th is already packed with cars. (26)
239	8/24/2012	Rowlett, Joni	There are few pedestrians compared to where the Gateway EmX is. (37)
239	8/24/2012	Rowlett, Joni	Instead of putting money towards transportation, it should go towards the public school systems. (8)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
240	8/14/2012	Rubin, Robert	Since the beginning of these BRT expansions, basic services have been cut. (5)
240	8/14/2012	Rubin, Robert	The distance between the EmX stops is too great a distance for the elderly and alter abled. [With minutes from Eugene Human Rights Commission meeting on March 20, 2012.] (16, 37)
240	8/14/2012	Rubin, Robert	Feeder buses are a vital component to the success of the system for the elderly and alter abled. (35)
240	8/14/2012	Rubin, Robert	I oppose the EmX project. (1)
241	8/27/2012	Rubin, Robert	Implementing EmX has caused route closings and service cuts. (5)
241	8/27/2012	Rubin, Robert	LTD has not run “feeder buses” that were an intricate part of the original EmX proposals and will never have the funds to do so. (35)
241	8/27/2012	Rubin, Robert	Operational costs are not properly factored into project and are too high; and funding is not sustainable. (6)
241	8/27/2012	Rubin, Robert	LTD has not proven the need for BRT in West Eugene. (9)
241	8/27/2012	Rubin, Robert	The current bus system is adequate. (36)
242	8/29/2012	Rubin, Robert	Operating the EmX will force LTD to cut important routes and services elsewhere. (6)
242	8/29/2012	Rubin, Robert	If project goes forward, it should be with caveat that no existing service will be diminished: no service cut backs, no loss of routes. (5)
242	8/29/2012	Rubin, Robert	If project advances, it needs to assure adequate feeder buses. (35)
243	8/22/2012	Rudy, Michael / Lucy	Creating a barrier for people to get to our new store may be a death sentence. (18, 19, 20)
244	8/29/2012	Sandgathe, Mike	Ridership projections do not warrant all of the expense. (37)
244	8/29/2012	Sandgathe, Mike	The project will cause much more congestion on 6th and 7th. (26)
244	8/29/2012	Sandgathe, Mike	I oppose the EmX project. (1)
245	8/25/2012	Sather, Eric	EmX construction will create congestion. (19, 26)
245	8/25/2012	Sather, Eric	Current projects will be ripped up and rebuilt with one less lane for cars, which is wasteful. (6)
245	8/25/2012	Sather, Eric	I oppose the EmX project. (1)
246	8/22/2012	Sawyer, Kim	EmX should not be built when LTD cannot afford regular buses. (5, 6)
246	8/22/2012	Sawyer, Kim	Projected revenues do not cover operations. (6)
247	8/24/2012	Scheen, Rona	EmX will make existing congestion on West 11th worse. (26)
247	8/24/2012	Scheen, Rona	The project will harm the businesses on 11th. (18, 19, 20)
247	8/24/2012	Scheen, Rona	The project is not worth the cost. (6)

<i>Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)</i>			
Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
247	8/24/2012	Scheen, Rona	LTD should let the people vote on it. (4)
248	8/24/2012	Schneider, Jerry	I oppose the EmX project. (1)
248	8/24/2012	Schneider, Jerry	The ridership does not justify the costs. (37)
248	8/24/2012	Schneider, Jerry	The project is a waste and inefficient use of resources. (6, 8)
248	8/24/2012	Schneider, Jerry	The project will cause idling and pollution. (3, 29)
248	8/24/2012	Schneider, Jerry	The project will create more congestion on the proposed route as well as residential side streets. (26)
248	8/24/2012	Schneider, Jerry	The EA glosses over these concerns. (3, 11, 12)
249	8/25/2012	Schneider, Michelle	The project shouldn't take up a lane of our streets. (26)
249	8/25/2012	Schneider, Michelle	I oppose the EmX project. (1)
250	8/22/2012	Schroder, Charles	I support the WEEE project. (1)
251	8/27/2012	Schroeder, Donald	I oppose the EmX project. (1)
252	8/25/2012	Schwab, Kelli	EmX does not fit image we have tried to create for Eugene. (33)
252	8/25/2012	Schwab, Kelli	Taking away lanes for cars will just create havoc. (26)
252	8/25/2012	Schwab, Kelli	Our economy cannot pay to sustain someone's visions. (1)
253	8/25/2012	Schwab, Richard	LTD should let the people vote and listen to what they say. (2, 4)
253	8/25/2012	Schwab, Richard	I oppose the EmX project. (1)
253	8/25/2012	Schwab, Richard	Instead of EmX, improve what we already have. (35)
253	8/25/2012	Schwab, Richard	Work on things that will benefit more than 3% of the population. (38)
254	8/25/2012	Schwab, Richard	We have bus service for those that need it. (36)
254	8/25/2012	Schwab, Richard	This is for cities of much larger populations with a major metro area with travel to and from. (39)
255	7/17/2012	Scott, Brad	[Requested update on property impacts he would face if the project is approved for design and construction.] (29, 30)
256	8/23/2012	Scott, Kenneth	I oppose the EmX project. (1)
257	8/29/2012	Scott, Marjorie	A public vote on this project will not occur, although LTD's survey shows most citizens oppose this project. (2)
257	8/29/2012	Scott, Marjorie	LTD has become dependent on Federal grants and lost sight of transportation goals. (1)
257	8/29/2012	Scott, Marjorie	This project is more about changing the zoning and appearance of West 11th than efficient transportation. Recent West 11th route reductions due to budget shortfalls prove this point. (5)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
257	8/29/2012	Scott, Marjorie	The project would expand unsustainable service to an area that is not supported by ridership. (37)
257	8/29/2012	Scott, Marjorie	We need a complete impact study to determine the significant effects of tree removal and how to mitigate properly. (3, 11, 29, 32)
257	8/29/2012	Scott, Marjorie	Until the EA, I received a different answer each time I asked for tree information. (12)
257	8/29/2012	Scott, Marjorie	We need more information about how LTD will replace the beautiful canopy of trees that improve the livability of our city. (32)
258	8/22/2012	Scott, Steve	The project will be underutilized, just as the buses are. (37)
258	8/22/2012	Scott, Steve	The vehicle traffic on our streets will be worsened. (26)
258	8/22/2012	Scott, Steve	Has the state signed off on this horrible idea? 6th and 7th are under state jurisdiction. (28)
259	8/29/2012	Scott, Sue	More in-depth analysis in an EIS should have been required. (11)
259	8/29/2012	Scott, Sue	Social impacts (elderly, disabled) were not properly addressed. (3, 16, 17, 32)
259	8/29/2012	Scott, Sue	Riders will have longer distances to a bus stop and longer travel times. (37, 42)
259	8/29/2012	Scott, Sue	Ridership projections are inaccurate. (3, 37)
259	8/29/2012	Scott, Sue	Distance to stations will burden elderly and handicapped. (16, 17)
259	8/29/2012	Scott, Sue	Wider pedestrian crossings will hurt business along routes. (20)
259	8/29/2012	Scott, Sue	Speeding buses will create safety problems. (20, 26)
259	8/29/2012	Scott, Sue	LTD should be required to locate utilities underground. (4)
259	8/29/2012	Scott, Sue	Access impacts during and after the construction have not been evaluated. (3, 11, 19, 20)
259	8/29/2012	Scott, Sue	Loss of parking has not been addressed appropriately. (3, 11, 18)
259	8/29/2012	Scott, Sue	Businesses need to be informed how construction will accommodate them. (19)
259	8/29/2012	Scott, Sue	LTD's plan to construct in two-block segments increases construction time and traffic restrictions. (19)
259	8/29/2012	Scott, Sue	I oppose the EmX project. (1)
259	8/29/2012	Scott, Sue	The current population doesn't require EmX. (33)
259	8/29/2012	Scott, Sue	The streets are not designed for EmX. (24, 26)
260	8/29/2012	Scott, Susan	EmX was relocated because of one local neighborhood. (2)
260	8/29/2012	Scott, Susan	EmX is out scale for our community. (39)

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Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
261	8/24/2012	Sherwood, Robert	I oppose the EmX project. (1)
262	8/22/2012	Short, Ken	EmX is out scale for our community. (39)
263	8/22/2012	Shubert, Jack	I oppose the EmX project. (1)
264	8/24/2012	Siegmund, Bob	EmX station spacing is too far apart for senior citizens and other transit riders. (16, 17, 37)
264	8/24/2012	Siegmund, Bob	I oppose the EmX project. (1)
265	8/27/2012	Siegmund, Bob	The ridership projections are unrealistic. (37)
265	8/27/2012	Siegmund, Bob	LTD should listen to the community, which opposes the project. (2)
265	8/27/2012	Siegmund, Bob	EmX is inappropriate for the auto-oriented West 11th Corridor. (33, 39)
265	8/27/2012	Siegmund, Bob	EmX will make the roadways more congested. (26)
265	8/27/2012	Siegmund, Bob	Plan to eliminate lanes conflicts with previous traffic studies. (24)
265	8/27/2012	Siegmund, Bob	EmX will hurt customers' access to and from businesses. (20, 26)
265	8/27/2012	Siegmund, Bob	EmX construction will cause businesses to fail. (19)
265	8/27/2012	Siegmund, Bob	LTD should not be able to use eminent domain to take private property. (22)
265	8/27/2012	Siegmund, Bob	City plans to take additional 15' easement for future transit use. (4)
265	8/27/2012	Siegmund, Bob	It is unknown if LTD has sufficient revenue to operate and maintain this additional route without cutting regular bus service. (5)
265	8/27/2012	Siegmund, Bob	Most LTD funding is from payroll taxes, which are expected to continue to drop in the foreseeable future. (4, 5)
265	8/27/2012	Siegmund, Bob	Jarrett Walker report raised questions about project design and planning. (27)
265	8/27/2012	Siegmund, Bob	Longer travel times will make the route less efficient and therefore more expensive for LTD to operate. (3, 6, 37)
265	8/27/2012	Siegmund, Bob	As designed, the project is not fiscally sustainable. (6)
265	8/27/2012	Siegmund, Bob	West Eugene is served by more than adequate bus service. (36)
266	8/23/2012	Siegmund, Scott	Transit serving the west side isn't an immediate priority. (4, 33, 36)
266	8/23/2012	Siegmund, Scott	The EA doesn't properly consider the impacts on small businesses caused by large-scale road construction. (18, 19, 20)
266	8/23/2012	Siegmund, Scott	LTD manipulates the data reported via local media to justify EmX to the public. (3, 11, 14)

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Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
266	8/23/2012	Siegmund, Scott	Public sector energy and monies could be directed toward other areas that would more benefit the contributing majority. (8)
266	8/23/2012	Siegmund, Scott	EmX will not help people in poverty as it will most likely reduce routes that serve their locale. (17)
267	8/29/2012	Slusher, Brett	I oppose the EmX project. (1)
267	8/29/2012	Slusher, Brett	Our city does not need this. (39)
267	8/29/2012	Slusher, Brett	We have buses going there already. (36)
267	8/29/2012	Slusher, Brett	If the economy gets better they can restore the routes that they've closed down in that area. (35)
267	8/29/2012	Slusher, Brett	Do not waste public money on this project. (6)
267	8/29/2012	Slusher, Brett	The project will worsen traffic with lane closures. (26)
267	8/29/2012	Slusher, Brett	The project will harm businesses. (18, 19, 20)
267	8/29/2012	Slusher, Brett	The project has inadequate ridership. (3, 37)
268	8/26/2012	Smith, Arlan	Our streets are already crowded. (26)
268	8/26/2012	Smith, Arlan	LTD needs to find another solution to the west Eugene area. (39)
269	9/6/2012	Smith, Ashley	I oppose the EmX project. (1)
270	8/23/2012	Smith, Benjamin	LTD should be able to prove the financial viability of this project. (6)
270	8/23/2012	Smith, Benjamin	An outside agency should audit LTD's projected revenue and operating costs. (5, 14)
271	8/24/2012	Smith, Holly	I oppose the EmX project. (1)
272	8/27/2012	Smith, Megan	There must be a better way to increase public transit to West Eugene. (39)
272	8/27/2012	Smith, Megan	I oppose the EmX project. (1)
273	8/26/2012	Snethen, Don	If it's not broke, why try to fix it. (36)
273	8/26/2012	Snethen, Don	EmX creates traffic problems for the majority of drivers to satisfy only a few bus riders. (25, 26, 33, 37, 38)
274	8/24/2012	Sousa, Rich	Don't spend our money foolishly. (6)
274	8/24/2012	Sousa, Rich	There's a need to improve traffic. (26)
274	8/24/2012	Sousa, Rich	Buses in Springfield are nearly empty. (36)
274	8/24/2012	Sousa, Rich	Spend only money you have, only where it is truly needed. (4, 8)
274	8/24/2012	Sousa, Rich	I don't want to pay for something that won't pay for itself. (40)
275	8/29/2012	Sowdon, Bob	People shop on West 11th because it is auto-oriented. (39)
275	8/29/2012	Sowdon, Bob	I oppose the EmX project. (1)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
276	8/28/2012	Speulda, Deb	I oppose the EmX project. (1)
276	8/28/2012	Speulda, Deb	There is no need to run buses to west Eugene when LTD is cutting service on that route. (5, 36)
277	8/27/2012	Splinter, Elayna	We need more smaller buses. (35)
277	8/27/2012	Splinter, Elayna	The project will make older riders walk farther from their homes to catch the bus. (16)
277	8/27/2012	Splinter, Elayna	I oppose the EmX project. (1)
278	7/16/2012	Srader, Doyle	I support the EmX project. (1)
279	8/29/2012	Stallings, Therese	Listen to the people: Do not build EmX. (2)
279	8/29/2012	Stallings, Therese	I oppose the EmX project. (1)
279	8/29/2012	Stallings, Therese	We can't even fill the buses we have now. (36)
280	8/22/2012	Stutzman, Glenn	LTD cannot afford to keep expanding EmX with "free (Federal) money". (1)
280	8/22/2012	Stutzman, Glenn	EmX has led LTD to cut service. Will the project harm it more? (5)
281	8/22/2012	Stutzman, Glenn	LTD claims of economic development or property value increase are not for a city of our size. (39)
281	8/22/2012	Stutzman, Glenn	LTD should provide comparable research applicable to a city of our size. (3, 11)
282	8/29/2012	Svejcar, Frank	I oppose the EmX project. FTA has been ill informed and influenced by biased City staff, stakeholders, special interests and the Chamber of Commerce. (1, 3, 4)
282	8/29/2012	Svejcar, Frank	The project will cost millions on construction and negatively affect property. (6, 30)
282	8/29/2012	Svejcar, Frank	The project is expensive to build, maintain and operate. LTD Board attends to staff benefits, not the public or ridership needs. (4, 5, 6)
282	8/29/2012	Svejcar, Frank	LTD should stop wasteful spending on projects this community does not need nor want. (1, 6)
282	8/29/2012	Svejcar, Frank	We should re-allocate funding to communities that want a transit system. (4, 8)
282	8/29/2012	Svejcar, Frank	The current system is well developed and operational. (35, 36)
283	8/29/2012	Sweet, Gary	LTD's projection of growth is optimistic and unrealistic. (3, 33, 37)
283	8/29/2012	Sweet, Gary	Taxes to support this will be insufficient if there are no jobs. (5)
283	8/29/2012	Sweet, Gary	I oppose the EmX project. (1)
284	8/22/2012	Tanner, Tyler	LTD should focus on fixing its current bus system. (5)
285	8/27/2012	Thomet, Kurt	Transit service is not a problem now. (36)

<i>Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)</i>			
Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
285	8/27/2012	Thomet, Kurt	Wasting our taxpayer money is a problem now. (4, 8)
285	8/27/2012	Thomet, Kurt	Many businesses will be negatively impacted by losing parking, and some will have to relocate because of lost parking. (18, 19, 20)
285	8/27/2012	Thomet, Kurt	We [Eugene] are not big enough for EmX. (39)
285	8/27/2012	Thomet, Kurt	LTD will have difficulty maintaining the system once funded. (6)
285	8/27/2012	Thomet, Kurt	The negative far outweighs the positive in this project. (1, 13)
286	8/23/2012	Thomet, Kurt	The government should listen to the business people who create the jobs. (1, 2)
286	8/23/2012	Thomet, Kurt	The buses that run now are mostly empty. (36)
286	8/23/2012	Thomet, Kurt	Businesses will be impacted negatively. (18, 19, 20)
287	8/22/2012	Thumel, Margaret	The bus serves less than 5% of the commuting population. (38)
288	8/22/2012	Thurlow, Diane	We oppose the EmX project. Do not force it on us. (1, 2)
289	8/29/2012	Tokatly, John	I oppose the EmX project. (1)
289	8/29/2012	Tokatly, John	EmX is a waste of public money to buy buses that are too big, to serve fewer routes, for a population that doesn't exist. (6, 37)
290	8/29/2012	Tomp, Richard	EmX will cause businesses to close. (19, 20)
290	8/29/2012	Tomp, Richard	Does anyone care? (2)
291	8/27/2012	Uchytel, Marlene	EmX on 7th will cause traffic problems. Better to have it on a street less traveled. (25)
292	8/29/2012	Underwood, Jim	The aerial photo(s), pg. 36, do not reflect the actual developed status of 4089 West 11th Ave. (3, 11)
292	8/29/2012	Underwood, Jim	Page 3-8. The planned elimination of parking at property # 107 would result in non-compliance with permitted use. (18, 30)
292	8/29/2012	Underwood, Jim	Section 3.2.2.2.3 Property Effects: The subject property and the neighboring property are significantly negatively affected and should be listed as impacted properties. The adjacent property # 106, (4087), currently does not have direct access to West 11th Avenue but has it through the public right of way in front of Property # 107 (4089). EmX could eliminate this access entirely and force access through the existing parking of property # 107 (4089). (11, 20, 29, 30)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
292	8/29/2012	Underwood, Jim	Section 3.2.2.2.4 Parking and Driveway Effects: Again both property # 107, (4089) and property # 106, (4087) are impacted negatively. The property historically and currently relies on legal non-conforming parking essential to the replacement / redevelopment of the site permitted on 7/20/09 as well as for existing operations. The EmX, as planned, would eliminate 7 existing parking spaces at the property # 107, (4089), building. Page 3-22 and Section 3.2.3: Disputed phrasing: “driveway/access closures would have minor effects on the use of some properties, but would not be significant”. From our point of view, the aforementioned loss of parking and restricted access would be devastating to our business according to its current operations. (11, 18, 30)
292	8/29/2012	Underwood, Jim	An existing internally lit pole sign exists for property # 107, (4089) in the public right-of- way and would be lost in the event of the EmX development. (11, 29, 30)
292	8/29/2012	Underwood, Jim	Over the course of the West EmX planning LTD staff assured us that these concerns were understandable and would be dealt with prior to final design. It is unnerving to see the significant potential negative effects of the proposed EmX expansion to our business and livelihood go undocumented or understated in the EA. (20, 30)
293	8/30/2012	VanderMeer, Ben	EmX is a redundant transit system; existing service is good enough. (1, 35, 36)
293	8/30/2012	VanderMeer, Ben	The project will cause congestion along the route and nearby. (26)
294	8/29/2012	Vandermeer, Krystin	EmX buses now run almost empty, except near the campus. (36, 38)
294	8/29/2012	Vandermeer, Krystin	The project is a waste of money. (1, 6)
294	8/29/2012	Vandermeer, Krystin	The project will snarl up traffic. (26)
294	8/29/2012	Vandermeer, Krystin	The project will greatly impede business operations. (18, 19, 20)
294	8/29/2012	Vandermeer, Krystin	Project will negatively impact living conditions for those in the path of destruction. (29)
295	8/22/2012	Vincent, Joe	I oppose the EmX project. (1)
296	8/23/2012	Vincent, Louise	We don't need the project. (1)
297	8/9/2012	Walters, Erin	[Request for information regarding comment response process.] (14)

<i>Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)</i>			
Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
298	8/23/2012	Walters, Erin	LTD is presenting information as research, but not supplying the data. (12) [with attachments]
298	8/23/2012	Walters, Erin	[This letter contained comments criticizing a presentation on transportation issues by someone who did not work on the EA's transportation studies. The presentation occurred at an EmX Steering Committee meeting.] (1, 4) [with attachments]
299	8/26/2012	Walters, Erin	[Referencing approved 3/17/2010 LRF, approved 2/16/2011 LRF, and approved 4/9/2012 LRF] LTD made sizeable changes in the LRF that resulted in LTD suddenly being able to afford EmX. LTD cannot really afford the West Eugene EmX. (5, 6) [with attachments]
300	8/27/2012	Walters, Erin	If LTD is going to make claims based on research, it should provide that research to the public. (12) [with attachments]
301	8/27/2012	Walters, Erin	[Comment regarding mechanics of email commenting.] (14)
302	8/28/2012	Walters, Erin	LTD has not been transparent. (14)
302	8/28/2012	Walters, Erin	Information on the website is difficult to find. (12)
302	8/28/2012	Walters, Erin	[Comments regarding Board policies and procedures.] (4)
302	8/28/2012	Walters, Erin	Construction will harm businesses while traffic avoids the area. (19)
302	8/28/2012	Walters, Erin	Some businesses on existing routes have not yet recovered from the installation of EmX (76 Station, Dry Cleaners on Main St). (21)
302	8/28/2012	Walters, Erin	LTD should commit to mitigation identified in EA. (29, 32)
302	8/28/2012	Walters, Erin	LTD's studies show no decrease in air pollution. (29)
302	8/28/2012	Walters, Erin	LTD should disclose those supporters who stand to financially gain from the project. Our Money Our Transit's petition gathered 3800 signatures in opposition to this EmX extension. LTD got 267 signatures on its petition in support of building it. (1, 2, 34)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
302	8/28/2012	Walters, Erin	The EmX bus is overweight when fully loaded; the added wear on roadways is not accounted for by LTD, which is an added cost for the taxpayers to repair the mixed use lane infrastructure (and not reflected in EA). The federal grants do not pay for the utilities to be moved underground. How does this better the community or area if utilities are still above ground? (4, 5, 6, 13)
302	8/28/2012	Walters, Erin	The project is a repeated economic penalty to the businesses that endured the first construction. (20)
302	8/28/2012	Walters, Erin	LTD expects the businesses to take them at their word that it will “mitigate” all concerns effectively. (1, 30, 32)
302	8/28/2012	Walters, Erin	Existing buses are not full. (36)
303	8/28/2012	Walters, Erin	[Submission of signatures collected since 2009 opposing project and Amazon Alternative (no longer under consideration).] (1) [with attachments]
304	8/28/2012	Walters, Erin	[Submission of signatures collected since 2009 opposing project and Amazon Alternative (no longer under consideration).] (1) [with attachments]
305	8/29/2012	Walters, Jeff	EmX is a waste of money. (1, 6)
306	8/25/2012	Ware, Gayle	EmX is a waste of money. (1, 6)
306	8/25/2012	Ware, Gayle	EmX will harm businesses. (18, 19, 20)
306	8/25/2012	Ware, Gayle	EmX is bad for the economy overall. (29, 30)
307	8/28/2012	Watkins, Karen	EmX will cause more traffic congestion on W 11th. (26)
307	8/28/2012	Watkins, Karen	Most business patrons on W 11th need cars. (39)
307	8/28/2012	Watkins, Karen	The long term costs/maintenance of EmX does not seem to be offset by the expected income. (40)
307	8/28/2012	Watkins, Karen	EmX is not worth the price. (1,13)
308	8/29/2012	Weaver, Brian	FTA should not issue a FONSI for the West Eugene EmX. (1)
308	8/29/2012	Weaver, Brian	The EA fails to show completed studies and approvals of traffic impacts/flow through the corridor. (23, 26)
308	8/29/2012	Weaver, Brian	The EA fails to address complete project impacts. (11, 32)
308	8/29/2012	Weaver, Brian	The EA provides inconsistent information. (3)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
308	8/29/2012	Weaver, Brian	LTD has only done an EA, which is less rigorous than an EIS. (11)
308	8/29/2012	Weaver, Brian	ODOT's official approval of the traffic impacts of the LPA and of reassigning a lane in a STA are not in the EA. (28)
308	8/29/2012	Weaver, Brian	Where is approval from the FHWA (via ODOT) to reduce freight-movement capacity on 6th and 7th? (25, 28)
308	8/29/2012	Weaver, Brian	EA states LPA would reduce auto capacity due to reassigning-a-lane, contradicting earlier claim that it would not reduce capacity. The EA does not explain how the LPA will improve the Garfield-Acorn and Bailey Hill-McKinley sections of 11th Avenue or how it will improve ODOT's "choke-point" ranking of 28th, on West 11th/Highway 126, Garfield to Veneta. (23, 24, 25, 26)
308	8/29/2012	Weaver, Brian	The EA should list the FTA, City of Eugene, and ODOT as officially approving the reduction of auto and freight movement capacity by this LPA. Where is the City Transportation Department's analysis and approval of the traffic impacts from the LPA? (28)
308	8/29/2012	Weaver, Brian	The EA does not justify a 400% increase in park-and-ride spaces. (43)
308	8/29/2012	Weaver, Brian	The EA uses inconsistent terms to describe the lane types (BAT, Dedicated, Mixed, Total). (3, 11, 23)
309	8/29/2012	Weaver, Brian	Correction on previous letter: substituted should have read substantiated (1)
310	8/22/2012	West, Wayne	Gateway route is a dud. How can LTD guarantee the West Eugene extension will be successful? (1)
310	8/22/2012	West, Wayne	Buses look empty most of the time. (36)
311	7/28/2012	Westgate, Lewis	Cannot imagine losing a single car lane in either direction given the traffic load on 6th, 7th, or West 11th. (26)
311	7/28/2012	Westgate, Lewis	Taking any parking away from businesses on W 11th will be a death sentence for many, especially if left turns are required. (18)
311	7/28/2012	Westgate, Lewis	W11th is auto-oriented and ridership will not increase. (39)
311	7/28/2012	Westgate, Lewis	The majority does not support the EmX project. (1, 2)
311	7/28/2012	Westgate, Lewis	There are no full buses on any of those routes. (36)
312	8/29/2012	White, Robert	LTD should be self-sufficient. (40)
312	8/29/2012	White, Robert	The project should not be using federal funding. (8)
312	8/29/2012	White, Robert	The majority of people oppose the project. (1, 2)
312	8/29/2012	White, Robert	LTD should put it to a vote. (4)
313	8/23/2012	Wike, Richard	Less than 5% of the population uses EmX. (38)
313	8/23/2012	Wike, Richard	The project is a waste of money. (1, 6)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
313	8/23/2012	Wike, Richard	We should divert the funds to education or law enforcement where it is really needed. (4, 8)
313	8/23/2012	Wike, Richard	Let's lose the federal funds - this is one of many unnecessary government projects. (4, 8)
314	8/23/2012	Wilcox, Merle	I oppose the EmX project. (1)
314	8/23/2012	Wilcox, Merle	W 11th is already crowded enough. (26)
314	8/23/2012	Wilcox, Merle	Construction will hurt business. (19)
314	8/23/2012	Wilcox, Merle	Buses are not full. (36)
314	8/23/2012	Wilcox, Merle	We should spend the money on upgrading downtown Eugene and making it the destination. (4, 8)
315	8/22/2012	Wong, Kono	Project is a waste of taxpayer money. (1, 6)
315	8/22/2012	Wong, Kono	Construction impacts will devastate my business. (19)
316	8/22/2012	Wong, Susan	Government shouldn't spend funds we don't have. (1)
317	8/26/2012	Young, Bill	How will LTD fund project that will cost \$1,000,000 more a year to run as well as the initial cost? (5, 6)
318	8/29/2012	Young, Steve	LTD's outlook is too optimistic. (3, 6, 11, 37)
318	8/29/2012	Young, Steve	There's no real demand for transit for this route. (36)
318	8/29/2012	Young, Steve	The project is a waste of money. (1, 6)
319	8/28/2012	Zahn, Ronald	Let the public vote on this issue. (4)
319	8/28/2012	Zahn, Ronald	Stop wasteful spending. (1)
320	7/22/2012	Zdzienicki, Josef	EA does not mention the maintenance of roads between rebuilt intersections and bus stops. Will Eugene or ODOT help defray the cost of wear and tear of the extra heavy buses? What are the total maintenance costs of the EmX fleet for fiscal year 2011-12? (5, 6) [with attachments]
320	7/22/2012	Zdzienicki, Josef	Please provide boarding numbers for the stops on the Gateway Loop separately from the first route for this last fiscal year, as well as some typical daily boarding numbers. (3, 11, 12, 37) [with attachments]
321	8/25/2012	Zdzienicki, Josef	EA has the wrong zip code for Tom Radmilovich- 98174 not 97174. (3) [with attachments]

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
322	8/29/2012	Zdzienicki, Josef	EmX running in mixed traffic in the most congested section on West 11th between Garfield and Seneca Streets does not alleviate much traffic congestion, especially if bus stops are in traffic lanes. (23, 26) [with attachments]
322	8/29/2012	Zdzienicki, Josef	A report by Jarrett Walker states, "the West 6th/7th alignment is only 1-2 minutes faster than existing service, and slower than a TSM option for the future." (27) [with attachments]
322	8/29/2012	Zdzienicki, Josef	Two reports written by OMOT consultants (CSA Planning, Ltd and REMJ Northwest) state that yearly operating expenses for the LPA will be \$4.3-4.7 million, not the \$1.2 million stated in the EA. (5, 6) [with attachments]
322	8/29/2012	Zdzienicki, Josef	[Citing Walker report on open/closed BRT systems:] The project does not satisfy the need in a feasible manner. (9, 27) [with attachments]
322	8/29/2012	Zdzienicki, Josef	The West Eugene Parkway would have alleviated a small amount of congestion, but at what price? The same goes for EmX. (4, 13, 26) [with attachments]
322	8/29/2012	Zdzienicki, Josef	LTD cut Route 30 (on West 11th) 3 years ago because it was a "duplicating" route. How have circumstances changed to create the need to run an EmX bus 6 times an hour down West 11th? (9, 37) [with attachments]
322	8/29/2012	Zdzienicki, Josef	LTD has not shown that the project is feasible; it doesn't ease congestion; doesn't reduce travel times by any significant amount, and it is too expensive to operate, thereby jeopardizing local service. (5, 6, 11, 23, 25, 26) [with attachments]
322	8/29/2012	Zdzienicki, Josef	[Citing Envision Eugene document:] Other transportation corridors in Eugene will develop before West 11th does. (33, 39) [with attachments]

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
322	8/29/2012	Zdzienicki, Josef	The EA states that there are 600 developable acres (redevelopable and vacant) within 1/4 mile of the LPA. An e-mail from LTD staff (Jan. 23, 2012) states that the 600 acres are within 1/2 mile of the LPA. (3, 11, 33) [with attachments]
322	8/29/2012	Zdzienicki, Josef	The creation of jobs addressed in Envision Eugene report is contrary to the EA findings. (3, 33, 37) [with attachments]
322	8/29/2012	Zdzienicki, Josef	The TSM option was never fully studied because it did not qualify for Federal funding, but it would better serve the project's purpose and need. (6, 9, 10) [with attachments]
322	8/29/2012	Zdzienicki, Josef	Projected ridership and cost data indicates that the WEEE is not cost effective compared to the first two corridors. (6, 37) [with attachments]
323	8/26/2012	Zehrunge, Gordon	It is not acceptable to take a lane from the existing roadway or take a lane from somebody's property at the side of the road. (1)
323	8/26/2012	Zehrunge, Gordon	The bus comes every 10 minutes because it only stops at points that are two miles apart. (37)
324	8/29/2012	Zelenka, Alan	I support the EmX project. (1)
325	8/29/2012	Zientara, David / Carol	I oppose the EmX project. It is not needed. (1)
325	8/29/2012	Zientara, David / Carol	West Eugene will not grow significantly in the next 30 years. (33)
325	8/29/2012	Zientara, David / Carol	EmX will not be used any more than the current bus system. (37)
325	8/29/2012	Zientara, David / Carol	LTD should use the money to improve the current system. (6, 35)
325	8/29/2012	Zientara, David / Carol	The project will worsen bad traffic. (26)
325	8/29/2012	Zientara, David / Carol	The federal government should spend money where it's needed. (8)
326	8/30/2012	Agnew, Brian	I oppose the EmX project without a public vote. (1, 4)
327	8/31/2012	Walker, Juel	I oppose the EmX project mostly because it will hurt businesses. (18, 19, 20)
327	8/31/2012	Walker, Juel	The project should go to a vote and the opponents will be in the majority. (2, 4)

Table 1. Comments Received During Public Review Period (July 16 –September 5, 2012)

Letter #	Date Received by LTD	Name / Affiliation (if stated)	Summary of Comment (with Response # in parentheses)
328	9/2/2012	Beals, Susan	It is irresponsible to spend public funds on a project that will serve a tiny percentage of us. (1, 38)
329	9/4/2012	Smith, Karen / Gary	The EmX project is a waste of money and should not be imposed on us. (1, 4, 6)
329	9/4/2012	Smith, Karen / Gary	The buses are rarely full as it is. (36)

Table 2. Responses to Comments

Response Number	Summary of Comment	Response
1	<p>General comments, not NEPA specific:</p> <ul style="list-style-type: none"> • Expression of opposition to the WEEE project. • Expression of support for the WEEE project. • Submission of articles not specifically related to the project. • Submission of project information but no associated comments. 	<p>Thank you for taking the time to provide a comment on the West Eugene EmX Extension project. Your participation in this project is important to FTA, as it is to LTD. Because FTA and LTD recognize the importance of having local decision makers aware of all the input we received, all comments received by September 5, 2012 were forwarded to the Eugene City Council on September 11, 2012.</p> <p>Please note that FTA considered all comments, even if they were not specifically relevant under NEPA and other pertinent environmental regulations.</p> <p>Also see related Responses to Comments numbers 3 and 4.</p>
2	<p>Comments related to individual and group opinions:</p> <ul style="list-style-type: none"> • LTD did not consider my opinion. • LTD should do what majority opinion wants. 	<p>The EA and its associated documents detail the extensive and meaningful public involvement in this project. (See AA Chapter 8: Public Involvement and EA Chapter 7: Community Involvement and Agency Coordination, and EA Appendices 7-1 and 7-2). Beginning in 2007, LTD used numerous strategies and tools to seek out, engage, and have meaningful conversations with the community, such as engaging existing and new committees; holding public meetings, hearings, workshops and events; communicating with postcards, emails, newsletters, letters, web postings, Facebook and Twitter, and newspaper and radio coverage; offering one-on-one meetings with property and business owners; and, giving presentations and field tours to special interest groups, organizations, and agencies. In addition, throughout the project, LTD conducted a variety of public opinion surveys in the community. The results of the surveys showed various levels of support for and opposition to the project at specific points in time.</p> <p>While it would have been impossible to agree with every opinion heard, since some were diametrically opposed, each viewpoint was considered. The project’s conceptual design changed dramatically based on comments from the public and this FONSI requires LTD to continue working with the public to make additional project refinements. LTD adequately considered public input in the conceptual formulation of the WEEE project.</p> <p>EA Chapters 1 and 2 and EA Appendices 1-1 and 1-3 describe how the public participated in the process leading to the LPA selection. LTD published the draft AA Report in October 2010, along with extensive technical analyses. From October 2010 to April 2011, LTD used a committee of community representatives from the LCOG, LTD, and the City Council to consider all of the technical information and community and agency input in determining the EmX alternative most appropriate for west Eugene. For example, four alternatives with “Add-A-Lane” design options were eliminated due to their potential impacts on abutting properties and the character of downtown Eugene, the TSM Alternative was found not to meet the project purpose and need and to have a relatively high cost/trip, and so on. After significant consideration, this committee selected two EmX alternatives for additional consideration by the public. Based on the public and agency input it received on these alternatives, the three decision making bodies then selected the LPA.</p>

Table 2. Responses to Comments

Response Number	Summary of Comment	Response
		<p>The level of public involvement in this project goes well beyond anything required by law.</p> <p>Some commenters referred to survey results indicating opposition to the project. FTA notes that its review, approval and funding of transit projects is based not on the results of polling, but on the outcome of a robust local planning process supported by vigorous participation of citizens, businesses, and relevant government jurisdictions. Given such a process, FTA believes that the best decisions regarding infrastructure are made at the local, regional and state levels. The EA and its supporting documents show that such a process occurred on this project.</p>
3	<p>LTD's data, analysis and projections are wrong or inconsistent.</p>	<p>FTA has considered each of the comments that suggest (with varying degrees of detail) that the EA includes specific data, analysis, or projections that are incorrect or questionable. FTA finds these comments either without basis or, in some cases, that even if the assertions are true, the accuracy of the specific data or projection in question is not determinative of the overall soundness of the EA's conclusions. The evaluation process requires LTD and FTA to consider a broad array of information and data and make predictions about future conditions. Because the environmental review process must occur early in project design, the analytical work often depends on judgments and estimations that will be refined and corrected as design details emerge. FTA recognizes that some estimates about the future may reflect the eventual outcome and others may not be accurate predictions of future conditions. However, FTA finds that the technical work supporting the EA reflects standard methodology and approaches; that estimates were developed using professional standards and appropriate professional judgment; and that the EA allows a reasonable basis for determining whether the project is likely to cause significant adverse impacts. The EA appropriately provides a basis for determining the nature and scale of impacts, for developing appropriate mitigation, and for assessing the likely effectiveness of the mitigation. FTA also notes that safeguards are built into the development project due to the additional local, state and federal permits that will be required based on final design details.</p>
4	<p>Comments expressing an opinion about public policy issues that are not NEPA issues, including topics such as:</p> <ul style="list-style-type: none"> • Decision by City to have EmX in west Eugene. • Requiring a public vote on the project. • Requiring LTD to include improvements beyond the scope of the project. • Should not use Federal dollars. • Should not use payroll tax to pay for transit. 	<p>LTD's and FTA's obligation under NEPA is to respond to questions related to the content of the EA and compliance with related laws and regulations. Questions or comments related to previous or future public policy decisions such as using or not using certain funding sources for this project relate to the authority of local, state and federal officials discharging their responsibilities under appropriate laws. However, it is important that policy-making officials know how commenters feel about the issues raised and, therefore, on September 11, 2012 LTD forwarded all comments to the appropriate decision-makers.</p> <p>The decisions surrounding the West Eugene EmX project have followed the same decision-making process followed for other transportation projects in the region. The Metropolitan Policy Committee of the local metropolitan planning organization is comprised of elected and appointed officials representing the cities of Eugene, Springfield, and Coburg; Lane County; the Oregon Department of Transportation; and Lane Transit District. This</p>

Table 2. Responses to Comments

Response Number	Summary of Comment	Response
	<ul style="list-style-type: none"> Comments relating to FTA funding requirements (New Starts), SAFETEA-LU, or other regulatory programs. 	<p>decision-making body makes funding decisions for all federally funded projects in the region. The first two EmX corridor decisions were managed in this manner and continuing to use this method is appropriate.</p> <p>Additionally, a critical function of the regional transportation planning process is to help balance competing demands placed on the transportation system as the region grows. Determining the best means for improving the transportation system and meeting future demands with limited resources is challenging. The framework for making decisions on the future of the region’s transportation system has become more complex in recent years. Public agencies play a primary role in providing transportation system infrastructure. The Regional Transportation Plan (RTP) provides the venue to ensure that transportation infrastructure improvements are coordinated and within the proper scope of each agency. LTD’s infrastructure investments are necessarily related to the regional transit network and associated roadway improvements. Suggested roadway improvements unrelated to the transit system are outside LTD’s purview; therefore, all comments received on the EA, including those concerning improvements beyond LTD’s authority, have been forwarded to the City of Eugene.</p> <p>Several commenters suggested or requested that the project be put to a public vote. That is not required or addressed under Federal law, but is appropriately left to the discretion of local officials.</p> <p>Some commenters also questioned whether the project met requirements related to FTA’s funding program (New Starts). FTA has considered those comments. FTA believes it has complied with Federal law governing FTA programs and Congressional direction to FTA.</p>
5	<p>Comments about whether or not LTD can afford to build West Eugene EmX:</p> <ul style="list-style-type: none"> LTD should not be building EmX when it is cutting regular bus service because it can’t afford it. LTD is not financially stable. How will LTD deal with any future financial challenges related to the project or organization. LTD should not build EmX if it can’t afford pensions. LTD’s finances should be audited. 	<p>Chapter 5 of the EA describes the project’s capital and operating costs and addresses questions of affordability. It shows that LTD’s long range financial plan does not require any further reductions in service hours to operate West Eugene EmX service.</p> <p>Chapter 5 also describes LTD’s funding sources and their sensitivity to swings in the local economy, and how the agency adjusts service depending on (a) funding availability, (b) increased demand, and (c) running time issues. Overall system performance, based on indicators such as on-time performance and ridership, remains high. As the economy continues to improve, LTD will have additional funds to invest in the system. How it prioritizes these funds will involve feedback from current riders, potential riders (residents who live in areas not currently served), and the broader community.</p> <p>LTD has disclosed and considered the risk of future financial challenges. See EA Section 5.6. Uncertain market conditions could affect the project as they could affect transit operations under the No-Build Alternative.</p> <p>Several commenters expressed opinions on policy or administrative issues related to local, regional or federal transit funding. Since these comments do not address substantive NEPA issues or the adequacy of the EA, no response is required. However, please see Chapter 5 for detailed information on the</p>

Table 2. Responses to Comments

Response Number	Summary of Comment	Response
		project's costs and LTD's long-term financial stability with and without the project.
6	<p>Comments about project costs:</p> <ul style="list-style-type: none"> • Construction and operational costs are too high. • REMI report questions validity of the construction, operating and maintenance cost projections. • Most expensive alternative was selected. • Project is not cost effective. • TSM is more cost effective. • EmX won't be able to sustain itself because of operational costs. • LTD needs to spend the money wisely. • Project is a waste of money. 	<p>Construction and operational costs are not environmental issues under NEPA. However, some financial detail and affordability analysis is appropriate as part of the project description and in considering its likely economic impacts. In Chapter 5 of the EA, construction and operational costs were described as part of demonstrating that LTD has identified adequate likely revenue to build and operate the project.</p> <p>As described in the EA, LTD developed the project from its conceptual beginnings with the help of a comprehensive public involvement process. (Also see related Responses to Comments numbers 2 and 4.) Costs, benefits, and trade-offs between them were among the considerations involved in reaching an LPA. As described in the EA, the Joint LPA Committee reviewed project information and received extensive public input in considering the tradeoffs of benefits and impacts that led to the LPA Committee's recommendation and, ultimately, the selection of the LPA by the three decision-making bodies in April 2011. The consideration of tradeoffs in the LPA selection process is described in more detail in the Locally Preferred Alternative Report (EA Appendix 1-1).</p> <p>Chapter 6 of the EA summarizes the project evaluation information and identifies key differences between the No-Build Alternative and the LPA. Section 6.3 discusses the significant trade-offs between the two alternatives.</p> <p>The EA and associated documents show that LTD developed and studied the TSM Alternative – an alternative comprised of relatively minor capital and operating improvements made to fixed route ("regular") bus service – during the planning process. However, at the conclusion of AA, decision makers selected the LPA (as refined) for further analysis and refinement, and eliminated the TSM Alternative. The decision reflects a balancing of many factors reviewed and weighed in the AA process (including the ability to meet purpose and need, and cost effectiveness).</p> <p>Several commenters taking issue with Chapter 5's analysis of operational costs cited an analysis by REMI Northwest. In urging that the EA underestimates the project's operational costs,, the REMI analysis (dated August 15, 2012) incorrectly assumes that the Year 2031 bus miles shown in Table 2.2 of the EA are what LTD would operate in 2017. The bus miles in Table 2.2 reflect an operating scenario for the 2031 RTP, which includes increases to regular bus service throughout the 2031 system. This scenario is financially feasible in 2031 based on the current analysis. However, it is not a reasonable basis for developing operating costs for 2017. FTA has confirmed that LTD plans to maintain regular bus service hours in 2017, and to consider service expansion based on available resources.</p> <p>Additionally, the REMI Northwest 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 appropriate for estimating the cost of an increment of service because they assume certain costs to the service that are not</p>

Table 2. Responses to Comments

Response Number	Summary of Comment	Response
		<p>applicable at this level of service change. The EA uses only cost factors that will actually change with changes to the level of service, and excludes all other costs that will not change under either the No-Build or LPA scenarios. This results in the lower operating costs shown in the EA.</p> <p>Also see related Responses to Comments number 13, regarding tradeoffs.</p>
7	<p>Project does not account for cost and supply impacts of peak oil.</p>	<p>The EA adequately addresses energy issues in Section 3.15.</p> <p>Regarding the potential cost and supply impacts of peak oil, BRT provides one of the best “early mitigation” activities currently available to prepare for peak oil and at the same time to reduce greenhouse gas emissions. It uses existing technology to provide a more fuel-efficient operation, and has shown significant success in attracting new riders.</p> <p>Issues associated with peak oil go well beyond the WEEE project, related to national and global issues of transportation and the overall economy. 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.</p> <p>Also see related Responses to Comments numbers 1 and 4 regarding policy decisions that are beyond the ambit of NEPA.</p>
8	<p>Money should not be spent on transit projects when there is a federal deficit; federal money should support other priorities.</p>	<p>Comments related to the appropriateness of federal spending on transit projects or other public infrastructure fall outside the ambit of the environmental review process.</p> <p>Also see related Responses to Comments numbers 1, 4, 5 and 13.</p>
9	<p>Comments regarding Purpose and Need:</p> <ul style="list-style-type: none"> • The EA fails to identify the Purpose and Need for the project. • LTD has not demonstrated a need for this project. • The EA findings don’t support Purpose and Need. 	<p>LTD’s development of the project purpose and need is acceptable procedurally and substantively. For context regarding the requirements relating to the purposes of FTA-supported transit projects, see 23 USC 139(f)(3) and 49 USC 5301(a) and (f), which were in effect at the time of the EA approval.</p> <p>In brief and as stated in the EA, the project <u>purpose</u> is to extend the existing BRT network to provide efficient, effective, dependable, and visually appealing service, consistent with adopted local and regional policies and plans. The project <u>need</u> arises from existing and projected increases in traffic congestion and transit travel times, increasing operating expenses, and the mandates of adopted land use and transportation plans and policies. EA Chapter 1 states the project’s “Purpose and Need Statement” and “Goals and Objectives” in their entirety and discusses them in detail.</p> <p>EA Chapter 1 also summarizes the extensive process LTD used to develop the project’s Purpose and Need. The public scoping period launched in 2007 included extensive outreach: mailings to every household within ½-mile of West 11th Avenue, public and agency meetings, open houses, field tours, media releases, and community events. 112 people commented at scoping meetings. LTD staff made presentations to and accepted input from environmental, community, civic and neighborhood organizations. LTD formed the WEEE Corridor Committee, comprised of business and property owners, residents, neighborhood associations, elected officials, bicycle</p>

Table 2. Responses to Comments

Response Number	Summary of Comment	Response
		<p>advocates, environmental advocates, and people with disabilities, to review the wide array of input and advise LTD on the project’s Purpose and Need and alignment and mode alternatives. LTD and the WEEE Corridor Committee considered 396 comments on the proposed Purpose and Need statement and Goals and Objectives (Scoping Report – West Eugene EmX Extension Purpose and Need Statement, Goal and Objectives (LTD, December 2007))) (available at www.ltd.org). Ultimately, the WEEE Corridor Committee recommended a Purpose and Need statement that the LTD Board adopted in March 2008. Federal, state and local agencies participated in the process. Agency comments led to minor refinements to the statement.</p> <p>Earlier high-capacity transit planning studies performed by LTD and the Lane Council of Governments (LCOG) supported screening out all non-BRT high-capacity transit alternatives from further study in the Tier II screening and evaluation of alternatives. (See (a) Bus Rapid Transit (BRT) Concept Major Investment Study (MIS) Final Report (LCOG, 1997); and (b) Urban Rail Feasibility Study Eugene/Springfield Area Final Report (LCOG, 1995)). Participants in those studies included LCOG, ODOT, LTD, the cities of Eugene and Springfield, Lane County and FHWA. The 2001 Eugene-Springfield Regional Transportation Plan identified BRT as the region’s preferred high-capacity transit mode. The WEEE Purpose and Need statement thus reflects the region’s earlier evaluation of high-capacity transit alternatives.</p> <p>The EA and documents cited therein adequately describe LTD’s pre-AA/NEPA 3-year process with the public and agencies to develop the project Purpose and Need and all reasonable mode and alignment alternatives which might reasonably meet that Purpose and Need (EA Section 2.1.1; EA Appendix 1-3, the AA Report (specifically <i>AA Appendix C: Screening and Selection Process and Alternatives and Options Previously Considered</i> and <i>AA Appendix D: West Eugene EmX Extension Project Supplemental Alternatives Screening Report</i>). This process included identifying, developing, evaluating and refining more than 50 alternatives. Based on the project’s Purpose, Need, Goal and Objectives, LTD established criteria to assess alternatives at all stages of alternatives development, yielding a comparison that would let decision-makers consider which alternatives best met the Purpose and Need. LTD documented the process and the findings at each step in reports that are listed in Chapter 12 of the EA and are available on the LTD web site. EA Chapter 6 and AA Chapter 9 summarize the Purpose-and-Need-based criteria used to evaluate and compare alternatives.</p> <p>For these reasons, FTA finds that the EA, with the associated studies and reports that it incorporates by reference, adequately documents that the development of the project Purpose and Need statement is consistent with NEPA and FTA guidance, and appropriately documents the basis for the alternatives included in the EA and the LPA’s consistency with the Purpose and Need statement.</p>
10	Comments about the EA failing to fully evaluate all mode and alignment	NEPA generally requires project proponents to consider the range of reasonable alternatives that could satisfy a project’s statement of Purpose and Need. LTD satisfied this requirement.

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Response Number	Summary of Comment	Response
	<p>alternatives:</p> <ul style="list-style-type: none"> • EA presupposes outcome. • Other alternatives should have been considered. • TSM Alternative should not have been eliminated. • This route was not the first choice and it should not be built. • Comments suggest other alternatives in lieu of LPA. • Comments suggest other corridors in lieu of LPA. • LPA does not meet federal criteria. 	<p>Environmental Assessments may but need not analyze more than one proposed alternative and a no-build alternative. (Also see related Responses to Comments number 9.) During the public scoping period, LTD proposed and invited comment on a range of alternatives to be studied. In response, LTD received comments suggesting additional alternatives. LTD staff prepared conceptual descriptions and maps of the more promising of the suggested alternatives, grouping them into mode and alignment alternatives; it then used a two-tiered process to screen and evaluate all of the alternatives. These findings were used by the LTD Board of Directors in determining how well the alternatives met the project’s Purpose and Need and which would be advanced into the AA/DEIS (documented in the WEEE Project Scoping Range of Alternatives Report (May 2008)). The AA process eventually led, as detailed in EA Chapters 1 and 2 and documents cited therein, to the selection of an LPA.</p> <p>The EA’s consideration of alternatives is based on years of documented analysis and consideration of a wide range of alternatives and does not presuppose an outcome. As illustrated in Figure ES.3, the alternatives under evaluation were altered during the process as a result of public and agency input; all reasonable alternatives that seemed potentially able to meet the project’s Purpose and Need were considered. Also, please see Responses to Comments numbers 2, 6 and 9 regarding the selection of the LPA, its consistency with Purpose and Need, and the elimination of the TSM and other potential alternatives.</p>
11	<p>Comments related to inadequate analysis:</p> <ul style="list-style-type: none"> • The analysis does not support the findings of the EA. • EIS with more rigorous analysis should have been conducted. • EA is a far less stringent requirement and inappropriate for the magnitude of this project. • EA is not definitive enough, too much speculation. • Does not meet NEPA requirements. 	<p>In 2007, FTA published a Notice of Intent to Prepare an Environmental Impact Statement (EIS) for the WEEE project (EA Appendix 7-3). Between 2007 and 2010, LTD followed the appropriate procedures for preparing an EIS including scoping, agency coordination, screening, alternatives refinement, and technical analyses. By early 2010, technical studies conducted for the EIS had revealed more significant impacts than originally anticipated. Based on these findings, and in consultation with the FTA and the U.S. Army Corps of Engineers, LTD significantly modified the proposed project by eliminating the westernmost segment and the Amazon Channel and Seneca Station alternatives. The scale of the project modifications avoided or reduced many impacts, which led to FTA’s determination that the project should proceed with an EA rather than an EIS. See EA Appendix 7-4 and Appendix 1-3 (specifically, AA Appendix D: WEEE Supplemental Alternatives Screening Memorandum). The significant evolution of the project in this way unavoidably produced a somewhat more complicated and voluminous set of supporting studies than if it had proceeded without such modifications. With the determination that the project will not cause significant environmental impacts, an EIS is not necessary.</p> <p>The pertinent project studies conducted since 2007 leading up to and supporting the findings of the EA, including studies conducted for the anticipated EIS, are referenced in the EA; Chapter 12 lists all of them. Chapter 12 also lists other memos and reports documenting the project’s extensive process to develop, in concert with the public, decision-makers, and agencies, a broad range of alternatives and then evaluate, consider and narrow the alternatives down to one LPA. Also see related Responses to</p>

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Response Number	Summary of Comment	Response
		<p>Comments numbers 6 and 9. The EA, as required by FTA and NEPA, summarizes the complex analyses completed for the project. It 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 a CD or in print for those who are interested.</p> <p>Commenters alleged that some of the preparers of various studies – staff, consultants, and/or experts – have conflicts of interest or are “corrupt” or disingenuous. FTA finds these allegations without merit.</p>
12	<p>Comments related to documentation:</p> <ul style="list-style-type: none"> • Too many documents and reports. • Too much detail for the general public to understand. • Too little detail. • Not enough supporting documents and reports to support EA findings. • Reports / data not easy to find on LTD’s web site. 	<p>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. They have been incorporated by reference into the EA. FTA finds that the EA appropriately attempts to satisfy NEPA’s mandates to provide an understandable discussion 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. Also see related Responses to Comments number 11.</p>
13	<p>The benefits of the project do not outweigh the impacts.</p>	<p>To the extent that this comment reflects a policy decision, please also see Responses to Comments number. 1. To the extent it reflects a criticism of the discussion or the analysis in the environmental documentation, FTA disagrees with it. The EA adequately addresses the impacts, mitigation, cost and tradeoffs of the LPA and the No-Build Alternative.</p> <p>Benefits and impacts of alternatives were considered in the AA process, in the selection of an LPA, and again in the EA. With its supporting documents, the EA adequately describes the multi-year process of developing, evaluating, assessing and refining alternatives, which resulted in the LPA. See EA Chapters 1 and 2 and documents cited therein; also see Responses to Comments numbers 9 and 11. For example, each of 12 alternatives under consideration at one point were assessed using 17 measures of effectiveness (MOEs) associated with eight evaluation criteria developed from the project’s Purpose and Need. The evaluation criteria and MOEs are summarized in EA Chapter 6. The application of these criteria helped show how well the alternatives met the project goals. The public was involved at each step.</p> <p>The consideration of tradeoffs by the Joint LPA Committee is described in detail in EA Appendices 1-1 and 1-2 (LPA Report and Recommendations, Approvals and Resolutions).</p> <p>The project was also evaluated against the federal qualitative and quantitative criteria used in the New Starts process.</p> <p>EA Chapter 6 summarizes the project evaluation information and identifies key differences and tradeoffs between the No-Build Alternative and the LPA.</p>

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Response Number	Summary of Comment	Response
14	<p>Comments related to the public process:</p> <ul style="list-style-type: none"> • Inadequate public process. • Not transparent. • No one talked to the businesses. • Not open to the public. • Public information was misleading. • Not clear how to comment. 	<p>Several comments correctly observed that NEPA requires meaningful public involvement. The allegation that LTD failed to satisfy that requirement is without merit. FTA finds that the public involvement undertaken for this project exceeds what is required under NEPA or any other applicable law.</p> <p>FTA observes that LTD, like other transit agencies, uses a variety of public processes that inherently foster transparency, although they do not assure consensus on every issue. For instance, the LTD Accessible Transportation Committee provides guidance and oversight of the region's Coordinated Human Services Transportation plan. The EmX Steering Committee and Corridor Committee provide feedback on issues related to EmX. The Metropolitan Planning Committee's Citizen's Advisory Committee reviews annual service and fare changes. The LTD Budget Committee pairs seven citizen members with LTD's seven board members to develop the annual operating budget. LTD posts for public review its annual independent audits and comprehensive annual financial reports. Finally, LTD employs an internal auditor who evaluates policies and procedures, audits processes, and develops controls to ensure LTD is managing its funds and other assets effectively and efficiently.</p> <p>In addition, LTD properly employed project-specific methods to encourage public involvement. Since 2007, LTD 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, 2, 6, 7 and 12. More detailed documentation is provided in the EA's technical report, Community Involvement, Agency Coordination, Tribal Consultation, and Environmental Justice Technical Report (March 2012).</p> <p>Since 2007, the public involvement program for the project solicited early and continued feedback from stakeholder groups and incorporated that input into the decision-making process. For instance, the WEEE Corridor Committee was comprised of Corridor stakeholder representatives: business owners, residents, neighborhood associations, property owners, LTD Board of Directors, Lane County Commissioners, Eugene City Council, bicycle advocates, environmental advocates, and people with disabilities. This committee advised LTD on critical issues such as the Purpose and Need, alignments, and mode alternatives. LTD and the WEEE Corridor Committee considered a wide array of viewpoints expressed from scoping through AA. LTD used additional strategies and tools to seek out, engage, and have meaningful conversations with the community as described in EA Chapter 7 and EA Appendices 7-1 and 7-2. Also see related Responses to Comments number 17.</p> <p>The EA and associated documents show that the LPA conceptual design and eventual alignment were shaped by hundreds of meetings with the community and stakeholders.</p> <p>Finally, FTA notes that LTD requested and was granted authorization to extend the EA public review period from 30 to 45 days. The EA made clear how citizens could submit comments. During the review period, LTD held two drop-in sessions to assist citizens with their review of the EA.</p>

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15	There was inadequate review by local, state and federal agencies.	Since 2007, LTD has engaged local, state and federal agencies in the development, review and refinement of the project. These efforts have been well documented throughout the project and are summarized in EA Chapters 1, 6, 7 and 12. Also, as described elsewhere in this FONSI, LTD will continue to engage with a variety of agencies in the course of securing permits for the project.
16	EmX will be difficult to use by elderly and disabled citizens.	FTA disagrees that EmX will cause problems for seniors and riders with disabilities. The west Eugene extension will resemble existing EmX in approach and technology, and be consistent with industry standards. In fact, many seniors and riders with disabilities find BRT easier to use than regular bus service. Helpful features include level boarding, the greater capacity to carry mobility devices given the higher frequency, and easier access to boarding platforms; these tend to make BRT more comfortable, more convenient, easier to use, and safer for those with accessibility issues. More information is provided in EA Section 3.3.2.2 and the EA's technical reports: Socioeconomic and Environmental Justice Technical Memorandum (August 2011) and Community Involvement, Agency Coordination, Tribal Consultation, and Environmental Justice Technical Report (March 2012). In addition, EmX stops have been chosen with consideration for their proximity to housing and key destinations for riders with accessibility issues.
17	Comments about the project failing to consider or mitigate impacts on: <ul style="list-style-type: none"> • Minorities. • Disabled / Alter Abled people. • Low income people. • Minority owned businesses. 	Since the project's initiation in 2007, LTD's communications about the 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 particular subsets of the community including minorities, seniors, those with accessibility needs, etc. LTD translated many materials into Spanish and provided interpreters upon request. LTD staff also visited many businesses door-to-door and upon request to discuss the project and document their preferences for design changes to minimize impacts. EA Section 7.1 details both the general project outreach and the specific outreach targeted to environmental justice populations. Substantively, as well, the project appropriately addresses special considerations of the populations identified in these comments. FTA finds the project properly solicited input from, considered the needs of, and responded to the concerns of the communities identified in these comments. More information is provided in EA Section 3.3 and the EA's technical reports: Socioeconomic and Environmental Justice Technical Memorandum (August 2011) and Community Involvement, Agency Coordination, Tribal Consultation, and Environmental Justice Technical Report (March 2012).
18	Comments regarding parking impacts on businesses: <ul style="list-style-type: none"> • Businesses will be hurt when they lose on-street parking. 	The EA carefully analyzes parking impacts. Along the nearly nine-mile corridor, the project will eliminate after mitigation only about 18 parking spaces on private property. This will affect a total of five businesses. The FONSI requires LTD to continue working with private property owners during final design to use existing right-of-way, sidewalk reductions and/or station design modifications, wherever possible, to minimize even further the project's property and parking impacts. LTD will also provide parking lot

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Response Number	Summary of Comment	Response
	<ul style="list-style-type: none"> Businesses will be hurt when they lose off-street parking. 	<p>redesign and/or restriping where feasible, to reduce even more the parking loss on private property.</p> <p>On-street parking will decrease by 53 spaces over the length of the nearly nine-mile alignment. Given existing demand and other nearby parking supply, this loss is manageable and not deemed to be a significant environmental impact. Still, during the next stage of project design the FONSI directs LTD to continue working with corridor businesses and explore more design refinements to preserve parking spaces wherever feasible.</p> <p>More parking related information and analysis is provided in EA Sections 3.1, 3.2, 3.3, 4.15, 4.3.1.2, 4.3.4, 6.1.7.1 and 6.3 as well as in the EA's technical reports: Motor Vehicle Transportation Technical Report (November 2010), Transportation and Parking Technical Report Addendum (August 2011), and Parking Impacts Addendum (May 2012).</p>
19	<p>Comments regarding construction impacts on businesses:</p> <ul style="list-style-type: none"> Businesses will lose revenue during construction. Businesses will close as a result of construction. Businesses will be forced to move to allow room for EmX. 	<p>Eugene businesses experienced temporary impacts during construction of the Franklin and Gateway EmX corridors. Such undesirable impacts occur across communities when roads are repaved, sidewalks are rebuilt, and utilities are moved or upgraded. LTD and its contractors worked with businesses to minimize these impacts. LTD will, like other transit agencies, build on experience as it continues to build out phases of its system.</p> <p>For example, EA Sections 3.17 and 4.3.4 explain that EmX construction (unlike traditional road construction) will generally be conducted in short segments along one side of a roadway. These three- to five-block work segments will let the contractor complete work in two to three weeks (typically). During construction, business access will be retained and signs placed to keep the public informed about access points. Where feasible, the work may be done at night, further reducing disruption to the businesses within the work segment.</p> <p>Construction along the Corridor will not begin immediately, giving businesses more time to emerge from the current recession. LTD will maintain access to all businesses during construction. As with other construction projects, LTD will use public communications and signs to inform the community that businesses are open.</p> <p>LTD has modified the project's route design over the past several years, reducing impacts to business and residential properties along the route by ensuring access and maintaining parking. Of the 477 properties that front the proposed route, only 118 will have any level of direct property impact. These impacts are minor for the vast majority of property owners. Two (2) businesses may be acquired if access and parking impacts cannot be mitigated; if that occurs, the business and property owners will receive just compensation according to federal law. Property impacts are discussed in more detail in EA Section 3.2 and EA Appendices 3-1 and 3-2. The FONSI requires LTD to continue to reduce impacts further as project design allows.</p>
20	<p>Comments regarding how EmX, once it is operating, will make it difficult for my customers to get to my</p>	<p>The EA traffic analysis indicates that the project will not degrade traffic capacity on West 6th, 7th, and 11th Avenues compared to the No-Build Alternative (EA Section 4.3.2).</p>

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	<p>business because of:</p> <ul style="list-style-type: none"> • Access closures. • BAT lanes. • Intersection turning movements. • Wider pedestrian crossings. • Reduced visibility of stores. • Types of people who ride EmX cause safety concerns. 	<p>The 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. Additionally, customers arriving by vehicle will find it easier to turn into businesses where "business access and transit" (BAT) lanes are constructed.</p> <p>The current route design has been significantly modified over the past several years. These design changes 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, 118 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 discussed in EA Section 3.2 and outlined in EA Appendices 3-1 and 3-2. During the project development phase, LTD will continue working with affected business and property owners to reduce impacts further.</p> <p>The EA studied potential effects of access closures on businesses (see EA Sections 3.1, 3.2 and 4.3.1.3 and Appendix 3-2). Access closures will only occur on properties with more than one driveway and will not eliminate property or business access. The FONSI directs LTD to keep working to further reduce access impacts. Also see related Responses to Comments number 30 for additional information.</p> <p>The LPA will improve certain sidewalks and some bicycle facilities. However, pedestrian crossing distances would increase at locations where the project will require roadway widening, resulting in slightly longer pedestrian crossing time and additional exposure to traffic. At these signalized intersections, the pedestrian crossing time will be adjusted to allow adequate crossing time. A new mid-block pedestrian crossing with a pedestrian refuge will facilitate pedestrian crossings of West 11th Avenue at the Obie Station. Intersection improvements will be designed to allow for clear lines of sight, reducing pedestrian-motorist conflicts. The LPA will also add two new foot/bike crossings of the Amazon Channel. EA Chapter 4 contains more detailed discussions of potential effects on pedestrian facilities.</p> <p>BRT stations are generally larger than existing bus stops; however, station design is sized for the surrounding neighborhood scale and will incorporate visually appropriate public art to enhance the streetscape. New BRT stations may slightly reduce visibility of stores from certain angles; they will not persistently obstruct visibility. See EA Section 3.6 and the Visual and Aesthetic Resources Technical Memorandum for more information.</p>
21	Other EmX projects hurt my business.	Please see related Responses to Comments number 19. Also see EA Sections 3.17 and 4.3.4, discussing mitigation for construction impacts.
22	EmX does not offer enough community benefit to justify eminent domain.	The power of eminent domain is given to the states in the US Constitution's Bill of Rights. States and state agencies have successfully used it over time to protect private property rights while building capital infrastructure for the public use. Eminent domain laws have been upheld as protecting property

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		<p>owners and ensuring a fair process.</p> <p>LTD is generally authorized to use eminent domain as necessary to build public transit infrastructure. Judicial review of the public necessity of any particular acquisition is available under state law. In the event a property owner disagrees with LTD's determination of just compensation for a specific acquisition, the owner may elect a jury trial process to determine the amount of compensation to be paid.</p>
23	The traffic analysis was not rigorous enough.	<p>FTA finds that the EA's traffic analysis employed reasonable methodology and met professional standards. It employed the methodology that would be have been required for a DEIS and was equally detailed and rigorous. FHWA, ODOT and the City of Eugene, among others, were involved in reviewing it. FTA finds the analysis appropriately rigorous.</p> <p>More detailed information related to the traffic analysis is provided in EA Chapter 4 and EA Appendices 4-1 and 4-2 as well as in the EA's technical reports: Travel Demand Forecasting Results Technical Report (July 2010), Motor Vehicle Transportation Technical Report Parts I and II (November 2010), Transportation and Parking Technical Report Addendum (August 2011), and Parking Impacts Addendum (May 2012).</p>
24	The traffic analysis contradicts the 1987 traffic study showing the need for 4 full lanes on 6th / 7th.	<p>FTA notes at the outset that population, employment, intersection operations, daily traffic counts and longer-term trends, transit ridership, etc. have changed in the last 25 years, along with transportation analysis and planning methodology and transportation forecasting technology. If there were a contradiction, it would not mean that the EA analysis was incorrect.</p> <p>More significantly, the EA traffic analysis took a different approach than the 1987 study. In developing and refining the LPA, LTD looked at the capacity and operations of critical intersections along both 6th and 7th Avenues. The LPA includes additional turn lanes (BAT Lanes) at these intersections to improve the capacity of the intersections and of the Corridor generally. At non-critical intersections along the Corridor, and at locations east of Washington Street where the traffic volumes are significantly lower, the LPA reduces the number of through travel lanes. Nevertheless, detailed analysis demonstrates that the overall Corridor travel times will decrease with the approach taken in the LPA. See EA Section 4.3 and Appendix 4-1.</p> <p>The LPA maintains four through lanes on 7th Avenue from Garfield Street to Washington Street, with additional BAT lanes at several critical intersections in this segment. It generally maintains four through lanes along 6th Avenue from Washington Street to Garfield Street. However, between about Blair Boulevard and Fillmore Street, it provides three through lanes and a fourth (BAT) lane. The only signalized intersection in this section is at Polk Street. The LPA includes an additional right turn lane from southbound Polk Street to 6th Avenue to increase capacity, but in any event the 6th Avenue/Polk Street intersection is not the critical intersection of the 6th Avenue Corridor.</p> <p>The future year traffic operations at the 6th Avenue/Polk Street intersection will be the same or better than with the existing lane configuration. Corridor travel times in the future with the LPA are better than with the existing lane</p>

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		<p>configuration.</p> <p>ODOT has reviewed the traffic analysis completed for the EA and has confirmed its findings and conclusions.</p> <p>Also see related Responses to Comments numbers 3 and 11.</p> <p>The EA transportation analysis is appropriate and reasonable.</p>
25	<p>The LPA would reduce auto and freight capacity on 6th / 7th.</p>	<p>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. Also see related Responses to Comments number 24.</p> <p>The project adds capacity to eight intersections along the Corridor. The LPA's BAT lanes will be shared with turning vehicles. Because they serve as refuge turning lanes for traffic, they allow the remaining travel lanes to operate more efficiently. The project includes BAT lanes along approximately 67 percent of the 11th Avenue alignment.</p> <p>The EA shows that all vehicles using the transportation network will experience fewer congested intersections, which will improve travel for all vehicles. Neither ODOT nor FHWA disagreed with this analysis. LTD must still secure formal ODOT and FHWA approvals later in project development.</p>
26	<p>Comments related to congestion and safety:</p> <ul style="list-style-type: none"> • The LPA will increase traffic congestion and create safety problems. • EmX has created congestion and safety problems in two other corridors. • Two-way next to one-way design creates dangerous situation, especially for pedestrians and bicyclists. 	<p>Please also see Responses to Comments numbers 24 and 25.</p> <p>All but two of the BRT stations along 11th Avenue are located in BAT lanes, avoiding impacts to through lane operations. The two BRT stations along 11th Avenue located within mixed flow will have the potential to delay through lane operations to some extent. Intersections in the study area will operate as well as or better under the LPA than under the No-Build Alternative, as discussed in EA Section 4.3.</p> <p>The project will provide design treatments to mitigate potential safety concerns related to two-way BRT operations adjacent to one-way auto flow. This occurs on Charnelton Street for two blocks. These design treatments will include visual cues (e.g., signage) and pavement markings (e.g., double yellow center line indicating two-way traffic) to alert users that BRT vehicles may be approaching from both directions. Pedestrian and bicycle crossings of the BRT route will be signal-controlled at the intersections of 7th Avenue, 8th Avenue and Broadway Avenue. Please also see Responses to Comments number. 20 regarding pedestrian and bicyclist safety. Additionally, please see Responses to Comments numbers 3 and 11 regarding the EA's transportation analysis.</p> <p>FTA finds that the EA adequately discusses congestion and safety.</p>
27	<p>Comments regarding the Jarrett Walker Report:</p> <ul style="list-style-type: none"> • This project is contrary to one of LTD's own studies • Report says a different alternative would have 	<p>The Walker report does not invalidate the EA's transportation analyses or conclusions.</p> <p>In December 2011, LTD's new General Manager commissioned a review of the West Eugene EmX project as part of his due diligence in leading a new organization which was studying a controversial expansion of its BRT system. Conducted by transit planner Jarrett Walker, the review was to provide an</p>

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	<p>been better.</p> <ul style="list-style-type: none"> This report was not considered in the selection of the LPA. 	<p>impartial expert perspective on the technical and political conditions surrounding the project. Based on some interviews and on existing documents and analyses, with no independent technical work done, the 16-page memo reconsidered each of four major decisions that led to the project. The memo, submitted in April 2012, concluded that while the LPA was not the optimal choice in some respects for extending EmX deeper into Eugene, (a) the decision to proceed with a West 11th extension was reasonable, (b) there are advantages and disadvantages to a “closed BRT” system (like the LPA), and (c) overall, the LPA is a reasonable step in building the overall BRT network. The report also stated that it should not be read to imply any recommendations.</p> <p>FTA first notes that the Walker memo presents no significant new information about the project’s impacts. For instance, LTD staff had clearly articulated in the Draft AA Report that travel times of the West 6th/7th/11th Avenues Alternative were longer than those of the TSM Alternative, and that a West 13th/West 11th alignment would be less circuitous and thus faster than an alignment using West 6th and 7th.</p> <p>FTA also observes that Walker’s report does not assert or imply that the technical work behind the EA is substandard. His report discusses trade-offs in technology/operations, in short- and long-term policy objectives, and in efficiencies. Those are appropriate policy issues for a transit agency to consider. The policy questions he raises do not reflect on the adequacy of the technical analyses supporting the EA or its conclusions about impacts.</p> <p>Finally, FTA notes that the Eugene City Council and the LTD Board were provided the Walker report before they voted later in the year to proceed with the LPA.</p> <p>Also see related Responses to Comments numbers 6, 9 and 10 regarding the selection of the LPA.</p>
28	<p>The proposed changes and the traffic impacts have not been reviewed and approved by local, state and federal agencies; permits that will be required have not yet been secured.</p>	<p>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, FHWA, DEQ, the Corps of Engineers, and other agencies regarding further approvals for project-related improvements. This pre-permit coordination is essential and sufficient, because FTA neither requires nor expects LTD to secure permits before it completes its environmental review process.</p> <p>Moreover, for many permits, engagement with the permitting agency occurs when the project has reached a higher level of design. The permits must still be secured.</p>
29	<p>Comments about adverse environmental impacts on:</p> <ul style="list-style-type: none"> Trees. Animals. Socio-economics. 	<p>The EA’s discussion of impacts exceeds the requirements for this level of environmental review. Analysis methods, data and reporting were reviewed and confirmed through agency review. The evaluations identify potential short-term and long-term direct impacts, indirect impacts and cumulative effects of the project alternatives and possible mitigation measures. As encouraged under NEPA (see 42 CFR Sec. 1502.21), the EA incorporates by</p>

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Response Number	Summary of Comment	Response
	<ul style="list-style-type: none"> • Property. • Businesses. • Utilities. • Air quality 	<p>reference these reports and other relevant studies and summarized the most meaningful and relevant information. LTD has coordinated appropriately with other federal, state and local agencies responsible for protecting the environment and will continue to do so during the project's final design and permitting.</p> <p>The EA properly discloses that after avoidance and minimization measures, the project will likely have some remaining but not significant impacts on trees, wetlands, animals, and other environmental attributes.</p> <p>Specific mitigation measures to offset potential project effects are summarized in the Executive Summary of the EA, discussed in EA Chapters 3 and 4 in relation to potential impacts, and detailed in EA Appendix ES-1. This FONSI commits LTD to specific measures to avoid, minimize, and offset potential impacts to the environment.</p>
30	EmX will adversely affect land and property values resulting in a negative effect on the economy.	<p>No significant adverse impacts to the economy were identified in the project's social and economic impact analysis (discussed in EA Section 3.3 and detailed in the Socioeconomics and Environmental Justice Technical Memorandum (April 2010)).</p> <p>LTD retained independent real estate analysts to evaluate the potential property impacts resulting from property acquisitions, driveway modifications and closures, structure impacts, and on-street and off-street parking removal. EA Section 3.2 summarizes this analysis and the full report is included in EA Appendix 3-2. The analysis evaluated direct and cumulative impacts to the 118 properties abutting the LPA alignment and provided mitigation suggestions. It determined that that total area currently proposed for acquisition is approximately 110,000 square feet, roughly 2 percent of the entire area of all 118 properties. The LPA will require more than 1,000 square feet from only 35 properties. The only full acquisitions are of ODOT-owned parcels. Two businesses might be displaced, if parking and access impacts cannot be sufficiently mitigated to meet their unique needs; if that occurs, LTD will provide relocation assistance and compensation in accordance with the federal Uniform Relocation Act.</p> <p>The LPA will also affect certain properties that use the public right-of-way for private parking, storage, signage, and landscaping.</p> <p>The report concluded that all adverse impacts can be mitigated. LTD is committed to continue to work with businesses throughout the next stage of design to seek additional ways to reduce impacts on businesses and property owners.</p> <p>FTA notes that the University of Utah Metropolitan Research Center recently analyzed EmX in studying the potential economic development potential of BRT (Bus Rapid Transit and Economic Development: Case Study of the Eugene-Springfield, Oregon BRT System, September 2012). The study concluded that despite the loss of jobs in the metro area between 2004 and 2010, the number of jobs increased within 0.25 miles of EmX stations. Analysis further showed that the share of jobs in many sectors of the metro area economy has shifted closer to EmX stations.</p>

Table 2. Responses to Comments

Response Number	Summary of Comment	Response
31	Definition of high-capacity transit.	Definitions of high-capacity transit systems vary, but commonly it refers to a transit system that moves more people than a car or typical bus, with fewer stops, higher speeds, and more frequent service than local bus service. It may operate in exclusive or non-exclusive ROW or a combination of both, and it must have the supporting services and facilities necessary to implement such a system. High capacity transit includes options such as light rail, commuter rail and bus rapid transit.
32	The EA does not adequately provide or discuss mitigation measures.	FTA disagrees. The EA adequately describes the potential impacts of the project and the likely measures to avoid minimize and mitigate those effects. Mitigation measures are discussed at length in Chapters 3 and 4, and are detailed again in EA Appendix ES-1. They are again summarized in Appendix C of this Finding of No Significant Impact, and this FONSI makes them conditions of FTA's approval. Commitments to mitigation are commensurate with this stage of the project.
33	<p>Comments about the project not being consistent with Eugene's long range plans / region's long range plans / Envision Eugene:</p> <ul style="list-style-type: none"> • Land use plans. • Nodal development. • Transportation plans. • West Eugene will not redevelop for at least 20 years, therefore this project is not justified. • Projected population cannot be accommodated in West Eugene. 	<p>The RTP guides planning and development of the transportation system within the Central Lane Transportation Management Area (TMA). It seeks to meet the TMA's transportation demands over at least a 20-year planning horizon, while also addressing transportation issues and making changes that can contribute to improvements in the region's quality of life and economic vitality. It considers all transportation modes: roadways, transit, bike and pedestrian circulation, freight movement and regional aspects of air, rail and inter-city bus service.</p> <p>This federally required regional planning process ensures that the planning activities and investments of the local jurisdictions are coordinated in terms of intent, timing, and effect. Projects in the RTP are initiated at the local and state level (i.e., within the planning processes of Eugene, Springfield, Coburg, LTD, Lane County and ODOT). Projects that anticipate Federal funding or are regionally significant with potential impacts on air quality must be included in the RTP.</p> <p>Federal and state laws require the RTP to include transportation policies and expected actions, and to be "financially constrained" (i.e., it assumes only revenues that are reasonably expected to be available over the planning period). The RTP must also demonstrate compliance with federal and state air quality requirements. Thus, the inclusion of the West Eugene EmX Corridor as the next link in the EmX system is based upon and consistent with adopted policies and plans for the region.</p> <p>City staff participated in the development, review and refinement of the WEEE project to assure its consistency 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; indeed, Envision Eugene designates the Corridor as a key transit corridor to support current and future housing and employment in west Eugene.</p> <p>It is possible that some commenters had trouble comparing data from the EA with Envision Eugene reports, since the latter were prepared at a different time, for a different purpose, at a different scale. The EA's</p>

Table 2. Responses to Comments

Response Number	Summary of Comment	Response
		<p>population and employment analyses and forecasts were nevertheless appropriate. They were prepared by the Lane Council of Governments using a data set commonly used for transportation planning work conducted in the region.</p> <p>EA Section 3.1 discusses the project’ potential for supporting the City’s designated areas for nodal development and its consistency with regional policies and programs that encourage nodal development areas (identified in the RTP).</p>
34	EmX supporters receive special considerations.	<p>This comment is outside the scope of the NEPA review process. However, supporters of LTD and its EmX projects do not receive special considerations for contract opportunities or benefits to their properties.</p> <p>FTA requires basic standards of conduct for all project work according to the federal guidelines that apply to all FTA grantees. Minimum and basic procurement standards are required under federal law that precludes any favoritism or conflicts of interest. LTD contracts with Lamar Transit Advertising for the sale of interior and exterior bus advertising. No business receives free advertising.</p>
35	<p>Comments about improving regular bus service instead of implementing BRT:</p> <ul style="list-style-type: none"> • Fix the existing system. • Run smaller buses more frequently. • Increase service during peak periods. • Why can’t we solve our needs with the existing transit system. • Increase the number of routes for regular buses. • Add feeder routes. 	<p>Many of these comments address policy decisions to be made by the LTD board and are outside of the NEPA process. Nevertheless, FTA reiterates that the EA Chapter 2 and the documents cited therein demonstrate that LTD performed a thorough planning effort before arriving at the LPA as its preferred means of addressing existing and anticipated conditions in the West 11th Avenue corridor. Its Alternatives Analysis (AA) process addressed fundamental questions: What are the problems in the corridor? What are their underlying causes? What are viable options for addressing these problems? What are their costs and benefits? The AA planning process examined regular bus routes as an alternative to BRT; both the AA process and the EA analyzed a no-action alternative as well.</p> <p>At its core, alternatives analysis is about serving local decision making. It is a locally managed study process that relies to a large extent on information about regional travel patterns, problems, and needs generated as part of the metropolitan transportation planning process, as specified by 23 CFR Part 450 FTA/Federal Highway Administration (FHWA) Joint Final Rule on Metropolitan and Statewide Planning. Local agencies participating in an alternatives analysis have broad latitude in how the study is to be performed. EA Appendix 1-3 (the AA Report, especially Chapter 9) describes how the alternatives were evaluated. The discussion in the EA and supporting documents shows that LTD reasonably decided to propose BRT for the Corridor. Also see related Responses to Comments numbers 6, 9, and 10.</p> <p>EA Chapter 4 discusses transportation operations (including transit operations) in the Corridor today; how they will change with the project; and how that compares to operations under the No-Build Alternative. EA Chapter 5 reasonably discloses the likely operating costs associated with the LPA and potential revenue sources. Chapter 6 evaluates the performance of the LPA and the No-Build Alternative. These analyses support the conclusion</p>

Table 2. Responses to Comments

Response Number	Summary of Comment	Response
		<p>that EmX represents a reasonable way to provide efficient and effective transit service in the corridor.</p> <p>As the economy continues to improve, LTD will likely have additional funds to invest in the transit system. These future administrative and policy decisions fall outside of the scope of NEPA.</p>
36	Existing bus service is sufficient (“existing buses are empty”).	<p>This comment also raises an issue outside the NEPA context. Nevertheless, LTD relied on generally accepted methods of calculating current ridership and forecasting future ridership. In addition to reviewing the EA, FTA technical staff reviewed LTD’s forecasts as part of LTD’s Small Starts application. The EA and the supporting materials also adequately describe the planning process that led to the selection of BRT as the preferred alternative, as discussed in Responses to Comments numbers 6, 9, 10 and 35. See also Responses to Comments number 37 regarding forecasts of future demand.</p> <p>FTA observes that transit agencies must balance many variables when planning new service. Included among these are current and forecast neighborhood character (e.g., density and land use), population and employment trends, ridership, congestion, linkages with other bus routes, construction and operating costs, environmental impacts, and other factors. The LPA represents the best efforts of LTD and is the outcome of the community’s planning process. It therefore represents a judgment that the project is necessary.</p>
37	<p>Comments about projected cost / ridership:</p> <ul style="list-style-type: none"> • Ridership does not justify the cost to implement EmX. • Projected ridership is inaccurate / inflated / double-counted. • Stations are too far apart, so people won’t ride EmX. • EmX is not efficient. • EmX does not move large groups of people efficiently. 	<p>Ridership cost-benefit analysis typically falls outside of the NEPA review. Nevertheless, as a policy matter, FTA notes that decision makers weigh a variety of financial and non-economic factors (including both costs and benefits) in deciding whether a major expenditure is justified. The EA is not intended to make that decision for them, but to reveal whether there are any significant adverse impacts, what other impacts might be, and how the impacts could be mitigated. In this way the environmental document helps the decision makers reach informed decisions.</p> <p>Ridership estimates used throughout the EA are based on industry standards, and FTA reviewed the technical modeling. The ridership technical details, results and methodology are provided in EA Appendix 1-3 (Alternatives Analysis Report). (The more detailed ridership studies referenced in the EA are available on LTD’s website and on a CD or in print.) The EA also discusses non-ridership benefits of the project and those analyses are reasonable.</p> <p>Chapter 5 of the EA adequately describes the construction and operating costs of the project and likely revenue sources.</p> <p>Projected ridership and cost per trip are discussed in detail in EA Chapter 6. On opening day, the LPA is anticipated to have a cost per trip that is 3.3 percent less than the No-Build Alternative, a savings that is projected to increase over time.</p> <p>EA Table 4.2 shows that LTD ridership increased from 8.6 million riders to 11.3 million riders from 2000 to 2010. The EA’s projections of future growth in demand and its assessment of BRT’s ability to meet that demand are</p>

Table 2. Responses to Comments

Response Number	Summary of Comment	Response
		<p>adequately supported.</p> <p>FTA notes that standard ridership analyses show that riders typically will walk farther for the type of BRT service provided by EmX than for regular bus service. Stations are typically 1/3 mile apart, which the average person can walk in less than 10 minutes.</p> <p>The EA addresses ridership issues adequately.</p>
38	<p>Comments about who EmX serves:</p> <ul style="list-style-type: none"> • Project will only serve a small percent of the people. • Primarily serves students. 	<p>Decisions about which populations to serve with a transit system are policy decisions. The EA is not designed to make those decisions. However, the EA does provide reasonable information regarding ridership to inform those decisions.</p> <p>The extension of EmX to West Eugene will improve transit ridership (as measured in various ways) within the Corridor and throughout the system. The technical report on ridership shows that system-wide transit trips are projected to increase by 500,000 annually in opening year, with up to 45 percent of all transit trips in the region using the EmX system (Travel Demand Forecasting Results Technical Memorandum, John Parker Consulting (July 2010)). Transit mode share will increase significantly throughout all EmX corridors. And one-third of the new trips will be made by riders with limited transportation options, showing that the service supports a needed community service while also attracting new riders to transit. The detailed ridership studies referenced in the EA are available on LTD's website and on a CD or in print.</p> <p>The planning process that led to the selection of the LPA considered the needs for the project and the various approaches to addressing those needs. (Also see related Responses to Comments numbers 6 and 35.) Section 3.3 of the EA adequately discusses projections of population and employment growth in the Corridor generally and within 1/2 mile of WEEE stations. The EA adequately addresses these comments.</p>
39	<p>Comments about EmX not being the right solution:</p> <ul style="list-style-type: none"> • For the West 11th Corridor. • Not the right size for a community of our size. • West 11th Corridor is auto oriented, not transit oriented. 	<p>The EA adequately discusses the planning process that led to the selection of EmX for the West 11th Corridor.</p> <p>EA Chapter 2 describes how the region selected BRT for Eugene-Springfield through a public process that examined a variety of high-capacity transit possibilities. The Eugene-Springfield Regional Transportation Plan (RTP) reflects this process and the resulting adopted local and regional policies directing the development of EmX. The RTP assessment concluded that BRT is a good fit for a community the size of Eugene-Springfield, and that the long-term ridership results and greater operational efficiencies of EmX will help the region meet its long-term goals. The RTP identified several corridors for additional study, including the West Eugene Corridor. (Also see Responses to Comments number 33.) In 2007, the City of Eugene City Council asked LTD to study West Eugene as the next extension of EmX.</p> <p>In the long term, the RTP anticipates that public transportation in various forms will play a part in reaching the community's goals. The RTP does not intend EmX to be the region's sole transportation solution, but rather a part of the solution. Other transportation system improvements and land-use</p>

Table 2. Responses to Comments

Response Number	Summary of Comment	Response
		decisions, coupled with public transportation improvements, will help the community keep up with its growing needs.
40	<p>Comments related to public transit should be self-supporting:</p> <ul style="list-style-type: none"> • LTD should be more self-sustaining before expanding service. • EmX will not generate enough fare revenue to meet financial needs of route. 	<p>Policy questions regarding levels of transit funding are not generally subject to NEPA review.</p> <p>Outside the NEPA context, FTA requires that transit agencies demonstrate the financial viability of projects and certain measures of cost effectiveness. EA Chapter 5 adequately discusses the potential revenue (including farebox revenue) available to fund construction and operational costs and briefly describes how FTA rated the project under New Starts.</p> <p>An analysis of subsidies for different forms of transportation is beyond the scope of a NEPA document.</p> <p>Also see Responses to Comments numbers 1 and 4 regarding non-NEPA policy questions, and numbers 5 and 6 regarding the EA's costs and revenues.</p>
41	Question regarding route roadways.	The EmX project will travel on a number of roads. The route details are described in EA Section 2.2.2 and illustrated in Figure 2.6.
42	<p>Comments related to travel time:</p> <ul style="list-style-type: none"> • Estimates are unrealistic. • LPA travel times will be longer. 	<p>As described in EA Appendix 4-2 (WEEE Transit Travel Time Methodology Memorandum), the detailed ridership studies referenced in the EA are available on LTD's website and on a CD or in print for those interested. The ridership data and travel time estimates used to evaluate project alternatives were developed using standard methodology. The data was reviewed by FTA's experts and determined to be valid and appropriate for this project. Also see related Responses to Comments numbers 3, 11, 23, 36 and 37 regarding the reliability of LTD methodology and forecasting.</p> <p>FTA finds that the EA addresses travel time issues adequately.</p>
43	<p>Comments related to park and ride lots:</p> <ul style="list-style-type: none"> • No park and ride at end of route. • Don't need more park and ride lots. • Existing park and ride lots are empty. • No plans to make the end of the route a hub serving western part of City. 	<p>There are several park and ride facilities planned for the Corridor in the RTP. These facilities, because already programmed, are not part of the EmX project. Nonetheless, consistent with NEPA, they were properly considered in the ridership analysis and discussed in the EA.</p> <p>The EA shows that there is sufficient existing population within walking distance to the proposed EmX stations.</p> <p>In the nearer term, the new Commerce Station terminus/park and ride lot will serve as something of a hub. It will have 125 parking spaces. Two new regular routes will provide service between the new Crow Road development area (to the west) and Commerce Station. Line 34 will operate during peak periods with connections westerly to employment centers near Willow Creek Road and in the Cone Industrial Park. Line 35 will have the same routing, but without service along Pitchford Road and Willow Creek Road. In the longer run, the City anticipates growth in housing and employment in this part of west Eugene.</p>
44	Running in mixed traffic ignores criteria for success.	The process that led to the LPA carefully considered the trade-offs of running EmX in transit lanes versus running in mixed traffic. EmX will travel in mixed traffic where the roadway capacity allows it to do so and still

Table 2. Responses to Comments

Response Number	Summary of Comment	Response
		<p>maintain improved long-term travel times.</p> <p>Also see related Responses to Comments numbers 3, 11, 23, 36 and 37 regarding the validity of the EA’s transportation analysis and forecasting.</p>
45	<p>Comments related to LTD inappropriately using public money:</p> <ul style="list-style-type: none"> • LTD used public money to run a campaign to promote the project. • LTD used public money to silence the opposition. 	<p>This comment raises questions that are outside of the NEPA review. Nevertheless, FTA notes that it is within the discretion of a project sponsor to pursue current and future public transportation services and the benefits of these services. The public information materials provided by LTD included information about how to learn more about the project. No new information was introduced that was not already disclosed as part of the evaluation of the project.</p> <p>FTA has no reason to believe that LTD tried to silence the opposition to the project. To the contrary, as explained in Responses to Comments numbers 2, 6 and 14, LTD undertook public involvement well beyond what the law requires. Many of the comments addressed in this FONSI show that the community enjoyed a strong debate about the wisdom of proceeding with the project.</p>

Appendix C: Mitigation Commitments

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The EA identifies a number of mitigation measures and other project features to reduce project impacts. This appendix summarizes those measures to facilitate implementation monitoring. LTD commits to carrying out these actions, processes, and design details as part of the project’s design and construction. The list below also specifies that LTD is responsible for ensuring compliance with each of these measures, although sometimes effective compliance will require LTD to coordinate with other necessary parties (e.g., the City of Eugene, the construction contractors, affected business and property owners, etc.). Any FTA funding agreement will also require LTD to implement the mitigation measures identified here and to develop a Project Management Plan with a detailed program for monitoring the implementation of the mitigation commitments.

LTD may not eliminate or alter any of the mitigation commitments for the project without FTA’s express approval. LTD will immediately notify FTA of any material change to the project from what the EA describes. “Material changes” can include project changes; changes in the severity or scope of anticipated impacts; changes in the affected environment; and changes in the regulatory environment. FTA will then determine and perform the appropriate level of additional environmental review, if any, necessitated by the change, in accordance with NEPA and FTA environmental procedures and other applicable authorities.

The table below describes the mitigation measures required. The measures are presented in order of and correspond to the EA’s presentation of the subject areas reviewed for environmental impacts. The “Measure Code” is merely an assigned number for ease of identifying the mitigation measure in the Table and when the Project Management Plan and mitigation monitoring report are developed.

1-1 Land Use (EA Section 3.1)

Measure Code	Measure	Responsibility <i>[and coordination]</i>
LU-1	Implement Mitigation Measure T-5, below.	Refer to T-5
LU-2	All permanent project improvements which occur inside the expanded ROW (such as new lanes, curbs, and stations) shall comply with City, ODOT and FHWA requirements for such facilities. Improvements within waterside protection zones shall comply with City site review permits.	LTD <i>[with City, ODOT, FHWA]</i>
LU-3	Implement Mitigation Measure T-2, below.	Refer to T-2
LU-4	Implement Mitigation Measure T-3, below.	Refer to T-3
LU-5	Confirm that property affected by project improvements would not be out of compliance with City codes or be required to meet additional City code constraints.	LTD <i>[with City]</i>

1-2 Property Acquisitions (EA Section 3.2)

Measure Code	Measure	Responsibility <i>[and coordination]</i>
PA-1	During final design, minimize land acquisition, off-street parking and property impacts as much as possible by maximizing the use of existing ROW, reducing sidewalks as possible, modifying medians and station designs, and/or building retaining walls on properties with significant slopes.	LTD <i>[with design team and real estate specialists]</i>
PA-2	<p>During final design, use the following multi-step process to determine whether measures can successfully mitigate potential impacts related to each property acquisition:</p> <ul style="list-style-type: none"> (a) Determine the operation of the business in terms of utilization of the site, building and other aspects of the real estate. Representatives of the project’s design team will study the spatial layout of the site and structure and meet with business owners and/or managers. (b) Determine the parking availability and current utilization, including both on- and off-site parking options; traffic engineers will analyze parking issues, particularly with regard to parking standards in relation to building occupancy and typical business operation. (c) Develop potential site-specific design options including alterations to the physical site/structure or modification of the functional utility of the site (i.e. parking configuration, traffic flow or building orientation). (d) Discuss any potential code compliance issues with City of Eugene staff to confirm continued code compliance for the existing and future use of the property. (e) Prepare design team recommendation for partial or full acquisition of the property following review of mitigation options and business or real estate impacts, and in consultation with the property owner. The project’s real estate specialist will present LTD management with a final recommendation. (f) Consider analysis and recommendation and make a final determination about the acquisition and the appropriate site-specific design options to mitigate impacts to the property to the extent feasible. 	LTD <i>[with design team and real estate specialists, in coordination with property and business owners and City]</i>
PA-3	Implement Mitigation Measure T-3, below.	Refer to T-3
PA-4	Implement Mitigation Measure T-4, below.	Refer to T-4

Measure Code	Measure	Responsibility [and coordination]
PA-5	Where impacts to structures cannot be avoided, work with property owners to determine feasible repairs or modifications and assist property and business owners with design, costs and permitting of structural modifications (at project expense).	LTD <i>[with design team and real estate specialists, in coordination with property and business owners]</i>
PA-6	Assist property and business owners with costs and permitting of relocating or replacing signs and/or fencing, and replacement landscaping.	LTD <i>[with design team and real estate specialists, in coordination with property and business owners]</i>
PA-7	Install glare shields at drive-thru lanes where sidewalk visibility is reduced.	LTD
PA-8	Implement Mitigation Measure LU-5, above.	Refer to LU-5
PA-9	Observe the requirements of the Uniform Relocation Assistance and Real Property Acquisition Act (“Uniform Relocation Act”) and state law by paying property owners at fair market value for any property used temporarily for construction activities that requires a temporary construction easement (TCE).	LTD <i>[with construction contractor, in coordination with real estate specialists and property owners]</i>
PA-10	Observe the requirements of the Uniform Relocation Act and state law by paying property owners fair market value for any property acquired and by providing relocation assistance to displaced owners and tenants.	LTD <i>[with real estate specialists, in coordination with affected property and business owners]</i>

1-3 Socioeconomics and Environmental Justice (EA Section 3.3)

Measure Code	Measure	Responsibility [and coordination]
SOC-1	Implement Mitigation Measure PA-10, above.	Refer to PA-10
SOC-2	Implement Mitigation Measure T-5, below.	Refer to T-5
SOC-3	Where feasible, incorporate context-sensitive design and landscaping to mitigate property-specific impacts.	LTD [with design team]
SOC-4	Install street and sidewalk lighting around both ends of Commerce Street station to West 11th Avenue to provide safe and secure access to and from terminus station.	LTD
SOC-5	Implement Mitigation Measure T-6, below	Refer to T-6
SOC-6	Implement Mitigation Measure T-7, below	Refer to T-7

1-4 Noise and Vibration (EA Section 3.4)

Measure Code	Measure	Responsibility [and coordination]
NV-1	Inspect the Westtown Apartments building during final design to determine whether the project would adversely affect interior noise levels. Employ building insulation as necessary to mitigate units where interior living and sleeping noise levels exceed HUD's interior noise standards.	LTD [with noise specialist]
NV-2	Include construction noise abatement requirements in project specifications, including at a minimum: <ul style="list-style-type: none"> ▪ Equipment shall not idle unnecessarily. ▪ All equipment used shall have sound-control devices no less effective than those provided on original equipment. ▪ All equipment exhaust shall be muffled. ▪ Establish a construction communication web site or hot line with information on upcoming construction activities. ▪ All equipment shall comply with pertinent Environmental Protection Agency (EPA) equipment noise standards. 	LTD [with construction contractor, in coordination with City of Eugene]
NV-3	Implement Mitigation Measure T-5 In response to specific noise impact complaints received during construction, and depending on circumstances, the contractor may be required to: <ul style="list-style-type: none"> ▪ Locate stationary construction equipment farther from nearby noise-sensitive properties; ▪ Reschedule construction operations to avoid periods of noise annoyance identified in the complaint; and, ▪ Install temporary or portable acoustic barriers around stationary construction noise sources. 	Refer to T-5 LTD [with construction contractor]

1-5 Air Quality (EA Section 3.5)

Measure Code	Measure	Responsibility [and coordination]
AQ-1	<p>Require contractors to comply with local and state rules (including ODOT standard contract specifications) and to include fugitive dust emission abatement requirements in contract specifications, including at a minimum:</p> <ul style="list-style-type: none"> (a) Apply water or chemicals to control dust during demolition, clearing, grading or construction; (b) Apply asphalt, water, or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces which can create airborne dusts; (c) Enclose or cover materials stockpiles; (d) Use hoods, fans, and fabric filters to enclose and vent the handling of dusty materials; (e) Use containment during sandblasting or other similar operations; and, (f) Cover materials that could become airborne in open-bodied trucks. 	<p>LTD</p> <p>[with construction contractor]</p>
AQ-2	<p>Include contract specifications that require contractor to reduce vehicle idling, keep equipment properly tuned and maintained, and use equipment that meets EPA's emissions standards.</p>	<p>LTD</p> <p>[with construction contractor]</p>

1-6 Visual and Aesthetic Resources (EA Section 3.6)

Measure Code	Measure	Responsibility [and coordination]
VA-1	<p>During final design, retain existing street trees and landscaping where practicable, using City standards.</p>	<p>LTD</p> <p>[with design team and construction contractor, in coordination with City Urban Forester]</p>
VA-2	<p>During construction, protect existing trees and landscaping where practicable.</p>	<p>LTD</p> <p>[with construction contractor, in coordination with City Urban Forester]</p>
VA-3	<p>Replace removed trees and landscaping consistent with City standards.</p>	<p>LTD</p> <p>[in coordination with City Urban Forester]</p>

Measure Code	Measure	Responsibility [and coordination]
VA-4	Design stations and landscaping to be compatible with area character and enhance its visual aesthetic.	LTD [with design team]
VA-5	Incorporate art elements along the project corridor and at station sites, where feasible.	LTD [with design team]
VA-6	Use non-glare lighting design and lighting shielding at stations to ensure that light sources are not directly visible from residential areas and to limit spillover light and glare.	LTD [with design team]
VA-7	Include contract specifications that reduce visual impacts from construction, including at a minimum: <ul style="list-style-type: none"> (a) Remove erosion control structures as soon as the area is stabilized. (b) Keep the roadway and work areas as clean as possible by using street sweepers and wheel washes to minimize off-site tracking. (c) Stockpile materials in less visually sensitive areas, preferably where they are not visible from residences. (d) Use short-term landscaping, berms, or fencing to buffer the neighborhoods from the construction area. 	LTD [with construction contractor]

1-7 Historic, Archaeological and Cultural Resources (EA Section 3.7)

Measure Code	Measure	Responsibility [and coordination]
HAC-1	During final design, determine design measures to minimize potentials impacts to above-ground resources identified in EA Section 3.7.	LTD [with design team]
HAC-2	Before ground-disturbing activities, prepare an Inadvertent Discovery Plan (IDP) (refer to EA Section 3.7.3 and Oregon state law (ORS 97.740-97.760, 358.905-358.955, and 390.235), and federal regulations (36 CFR Part 800)).	LTD [with cultural resources specialist, in consultation with SHPO]
HAC-3	Contractually require contractors to avoid above-ground resources identified in EA Section 3.7 and to comply with the IDP.	LTD [with construction contractor]

1-8 Parks and Recreation Areas, and Section 4(f) (EA Section 3.8)

Measure Code	Measure	Responsibility <i>[and coordination]</i>
PR-1	Implement alternative access provisions and coordinate construction to avoid or reduce disruption for users of park resources.	LTD <i>[with construction contractor]</i>
PR-2	Replace affected trees at the southern end of Washington/ Jefferson Park.	LTD <i>[with construction contractor, in coordination with ODOT and the City Urban Forester]</i>
PR-3	Provide adequate barriers, flagging, and alternate route marking along Fern Ridge Path during construction of proposed Amazon Channel crossings.	LTD <i>[with construction contractor]</i>
PR-4	Implement construction noise and dust mitigation (Mitigation Measures N-3, N-4; and AQ-1, AQ-2)	Refer to N-3, N-4, AQ-1, AQ-2

1-9 Hazardous Materials (EA Section 3.9)

Measure Code	Measure	Responsibility <i>[and coordination]</i>
HM-1	Perform “All Appropriate Inquiry” (AAI) Phase I Environmental Site Assessments, and Phase II Environmental Site Assessments if appropriate, as part of due diligence to further evaluate presence of hazardous substances and/or petroleum hydrocarbons on property that will be fully or partially acquired as part of the project.	LTD <i>[with hazardous materials specialist]</i>
HM-2	Prepare a soil management plan before construction to minimize potential exposure to hazardous material during construction.	LTD <i>[with hazardous materials specialist and construction contractor]</i>
HM-3	Prepare and use environmental response contingency plan and, as appropriate, site-specific management plans to mitigate direct and indirect impacts from releases of hazardous substances and petroleum products.	LTD <i>[with hazardous materials specialist and construction contractor]</i>

Measure Code	Measure	Responsibility [and coordination]
HM-4	If dewatering activities are proposed for construction, prepare a supplemental management plan for groundwater.	LTD [with hazardous materials specialist and construction contractor]

1-10 Geology and Seismic Activity (EA Section 3.10)

Measure Code	Measure	Responsibility [and coordination]
GS-1	Where project improvements cross the Amazon Channel, use appropriate design that considers and responds to subsurface conditions based on a project geotechnical study prepared by a qualified geotechnical engineering experts.	LTD [with geotechnical engineer and design team]

1-11 Biological Resources and Endangered Species (EA Section 3.11)

Measure Code	Measure	Responsibility [and coordination]
BIO-1	Comply with water quality treatment standards in SLOPES IV Programmatic Biological Opinion.	LTD [with biological specialist, water quality engineer and design team, in coordination with Corps of Engineers]
BIO-2	Comply with ODFW preferred in-water work period for the Amazon crossings (July 15 thru October 15).	LTD [with biological specialist, water quality engineer and design team, in coordination with Corps of Engineers]
BIO-3	Assure a clear span over the Amazon Channel waterway at all crossings.	LTD [with biological specialist and design team]

Measure Code	Measure	Responsibility [and coordination]
BIO-4	Comply with ODFW and / or NMFS criteria for maintaining an active channel at new or modified waterway crossings	LTD [with biological specialist, water quality engineer and design team, in coordination with Corps of Engineers]
BIO-5	Design the project to minimize new pollution-generating impervious surface as much as possible.	LTD [with biological specialist, water quality engineer and design team, in coordination with Corps of Engineers]
BIO-6	In areas where disturbance of riparian vegetation, soils, streambanks, or stream channel occurs, must clean up and restore those features to pre-existing conditions or better (including remove invasive species and plant with native vegetation)	LTD [with biological specialist and construction contractor]
BIO-7	Select and operate heavy equipment to minimize adverse effects on the environment per the SLOPES IV guidance	LTD [with biological specialist and construction contractor]
BIO-8	Design and install habitat-friendly landscaping near new and widened project crossings of the Amazon Channel.	LTD [with biological specialist and design team]
BIO-9	Minimize the use of riprap at new and widened project crossings of the Amazon Channel.	LTD [with biological specialist, water quality engineer and design team]

Measure Code	Measure	Responsibility [and coordination]
BIO-10	Incorporate large woody debris (including downed wood and standing snags) in riparian areas at new and widened project crossings of the Amazon Channel.	LTD [with biological specialist and construction contractor]
BIO-11	Remove non-native, invasive plant species, such as Himalayan blackberry and reed canarygrass, near new and widened project crossings of the Amazon Channel.	LTD [with biological specialist and construction contractor]
BIO-12	Plant native trees and shrubs and seed with native herbaceous mix within the riparian areas near new and widened project crossings of the Amazon Channel.	LTD [with biological specialist and construction contractor]
BIO-13	Replace removed street trees and disturbed landscaping as feasible wherever trees and landscaping are removed for the project.	LTD [with biological specialist and construction contractor]
BIO-14	Avoid tree removal throughout project impact area between March 1 and September 1 to comply with Migratory Bird Treaty Act.	LTD [with biological specialist and construction contractor]
BIO-15	Enhance the wetland buffer associated with the protected wetland north of the Commerce Street station.	LTD [with wetland specialist and design team]
BIO-16	Employ erosion and pollution control plans throughout project impact area to minimize water quality impacts during construction.	LTD [with biological specialist, water quality engineer, design team, and construction contractor, in coordination with Corps of Engineers]

Measure Code	Measure	Responsibility [and coordination]
BIO-17	Install stormwater conveyance and treatment systems throughout project impact area consistent with ODOT and DEQ water quality requirements.	LTD [with biological specialist, water quality engineer and design team, in coordination with Corps of Engineers, ODOT, DEQ and City]

1-12 Wetlands and Waters of the State and U.S. (EA Section 3.12)

Measure Code	Measure	Responsibility [and coordination]
W-1	Comply with Corps of Engineers' permitting requirements, including water quality treatment standards in SLOPES IV Programmatic Biological Opinion.	LTD [with biological specialist, water quality engineer and design team, in coordination with Corps of Engineers]
W-2	Comply with DEQ regulatory and permitting standards.	LTD [with wetland specialist, and design team, in coordination with DEQ]
W-3	Provide compensatory mitigation in compliance with the standards of SLOPES IV and resource agency standards.	LTD [with wetland specialist, and design team, in coordination with Corps of Engineers and DSL]
W-4	Restore temporary wetland and waterway impact areas.	LTD [with biological specialist, wetland specialist, water quality engineer and design team, in coordination with Corps of Engineers]

Measure Code	Measure	Responsibility [and coordination]
W-4	Implement Mitigation Measure BIO-3, above.	Refer to BIO-3
W-5	Design the project to minimize new impervious surface, as much as feasible.	LTD [with water quality engineer and design team]
W-6	Implement Mitigation Measure BIO-9, above.	Refer to BIO-9
W-7	Implement Mitigation Measure BIO-10, above.	Refer to BIO-10
W-8	Implement Mitigation Measure BIO-11, above	Refer to BIO-11
W-9	Implement Mitigation Measure BIO-12, above.	Refer to BIO-12
W-10	Enhance buffer associated with protected wetland (identified as wetland #39 in EA) for habitat	LTD [with biological specialist, wetland specialist, water quality engineer and design team, in coordination with Corps of Engineers and City]
W-11	Require construction contractor to retain and/or treat stormwater runoff from impervious surfaces for all areas under construction (refer to Water Quality and Hydrology / EA Section 3.13).	LTD [with water quality engineer, design team and construction contractor]

1-13 Water Quality and Hydrology (EA Section 3.13)

Measure Code	Measure	Responsibility [and coordination]
Surface Waters		
WQ-1	Include contract specifications requiring the contractor to comply with water quality treatment standards in SLOPES IV Programmatic Biological Opinion, including not using dedicated flow control facilities.	LTD [with biological specialist, water quality engineer and design team and construction contractor]

Measure Code	Measure	Responsibility [and coordination]
WQ-2	Include contract specifications requiring compliance with ODOT's water quality standards (even on non-ODOT-owned roadways).	LTD [with biological specialist, water quality engineer and design team and construction contractor]
WQ-3	Include in project design, to the extent feasible, vegetated and mechanical stormwater runoff treatment, including vegetated swales, raingardens, stormwater planters, filter strips, and some proprietary facilities, such as StormFilter™ catch basins and manholes etc, sized to meet the SLOPES IV water quality design standards.	LTD [with water quality engineer and design team, in coordination with Corps of Engineers]
WQ-4	Include contract specifications requiring the contractor to develop and implement a Temporary Erosion and Sediment Control Plan (TESCP) to lessen impacts to project surroundings during construction. The TESCP shall require, at a minimum: <ul style="list-style-type: none"> (a) Graveled or paved construction entrances to staging and work areas. (b) Either watertight trucks or on-site load draining for transport of excavated saturated soils. (c) Procedures to prevent the discharge of any wash water from concrete trucks. (d) Procedures for the correct installation and use of all erosion and sediment control measures. (e) A program to monitor erosion/sediment control measures and keep them in working order. (f) On-site procedures for prompt maintenance or repair measures. (g) Periodic site inspections to ensure compliance with TESCP. 	LTD [with water quality engineer and design team]
Groundwater		
WQ-5	Implement Mitigation Measure WQ-3, above	Refer to WQ-3
Floodplains		
WQ-6	During final design, conduct floodplain analysis for project area in or near 100-year floodplain.	LTD [with water quality engineer and design team, in coordination with City]

Measure Code	Measure	Responsibility [and coordination]
WQ-7	Confirm that project flood zone encroachment produces no rise in flood levels during base flood occurrence.	LTD [with water quality engineer and design team, in coordination with City]
WQ-8	Comply with City of Eugene floodplain development permit, including preparation of a proposed floodplain mitigation plan if required.	LTD [with water quality engineer and design team, in coordination with City]

1-14 Utilities (EA Section 3.14)

Measure Code	Measure	Responsibility [and coordination]
U-1	Include contract specifications specifying that construction contractor will coordinate all construction activities, scheduling, and staging with utility purveyors to the extent feasible.	LTD [with construction contractor]
U-3	Notify businesses and residences of any known utility disruptions (regardless of duration) as part of the project's outreach program.	LTD [with construction contractor, coordinating with affected businesses and residents]
U-3	Implement Mitigation Measure HM-3, above.	Refer to HM-3

1-15 Energy and Sustainability (EA Section 3.15)

Measure Code	Measure	Responsibility [and coordination]
ES-1	Include contract specifications that require the construction contractor to: <ul style="list-style-type: none"> (a) Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to no more than 5 minutes. Provide clear signage that posts this requirement for workers at site entrances. (b) Maintain all equipment in proper working condition according to manufacturer's specifications. Have equipment checked by a certified mechanic and determined to be running in proper condition before it is operated. 	LTD [with construction contractor]

Measure Code	Measure	Responsibility <i>[and coordination]</i>
	<ul style="list-style-type: none"> (c) Train equipment operators in proper use of equipment. (d) Use the proper size of equipment for the job. (e) Use equipment with new technologies when possible (repowered engines, electric drive trains). (f) Where feasible, use alternative fuels such as propane or solar for onsite generators, or use electrical power. (g) Where feasible, use an ARB-approved low carbon fuel for equipment. (NOx emissions from the use of low carbon fuel must be reviewed and resulting increases must be mitigated.) (h) Encourage carpools, shuttle vans, transit passes and/or secure bicycle parking for construction worker commutes. (i) Recycle or salvage non-hazardous construction and demolition debris (goal of at least 75% by weight). (j) Use locally sourced or recycled construction materials (goal of at least 20% based on costs for building materials, and based on volume for roadway, parking lot, sidewalk and curb materials). (k) If feasible, use SmartWay certified trucks for deliveries and equipment transport. (l) Develop a plan to efficiently use water for adequate dust control. 	
ES-3	Preserve existing trees where practicable and replace removed trees.	LTD <i>[with construction contractor]</i>
ES-4	During final design, incorporate design measures that enhance and do not create barriers to non-motorized transportation.	LTD <i>[with design team]</i>

1-16 Street and Landscape Trees (EA Section 3.16)

Measure Code	Measure	Responsibility [and coordination]
ST-1	Replace all removed street trees at a ratio of at least 1:1, and in coordination with City's Urban Forester on species and locations to be planted.	LTD [with construction contractor, in coordination with City's Urban Forester]
ST-2	Compensate property owners for landscape trees that are removed by the project.	LTD [with real estate specialist]
ST-3	Include contract specification requiring development and implementation of Tree Protection Plan and BMPs for construction activities.	LTD [with construction contractor, in coordination with City's Urban Forester]

1-17 Transportation (EA Chapter 4)

Measure Code	Measure	Responsibility [and coordination]
T-1	In final design, minimize access impacts by maximizing as feasible the use of existing rights-of-way, minimizing sidewalk reductions and modifying station design.	LTD [with design team]
T-2	During final design, offset on-street parking loss as feasible by adding new on-street parking spaces on west side of Charnelton Street. Capacity, location and number of new on-street parking spaces shall be consistent with City standards.	LTD [with design team, in coordination with City of Eugene]
T-3	Where off-street parking loss cannot be avoided, work with property and business owners to redesign and / or restripe off-street parking areas (at project's expense), where feasible.	LTD [with design team, traffic specialist and real estate specialist, in coordination with business and property owners]

Measure Code	Measure	Responsibility [and coordination]
T-4	Where driveway closures or modifications cannot be avoided, work with property and business owners to redesign and / or restripe off-street parking and circulation areas (at the project's expense), where feasible.	LTD [with design team, traffic specialist and real estate specialist, cooperating with property and business owners]
T-5	<p>Include contract specifications that require construction contractor to prepare a traffic mitigation plan. The plan shall require, at a minimum :</p> <ul style="list-style-type: none"> (a) Establishing a construction management team that includes LTD's assigned construction liaison staff, developing protocols for minimizing and addressing construction impact issues with the liaison, and maintaining effective advance communication with the liaison in project scheduling and conflict resolution; (b) Limiting the length of lane closures to about five blocks; (c) Limiting road or lane closures to non-peak traffic periods when practical; (d) Working on one side of road at a time to minimize impact to road users; (e) Limiting the length of construction zones in locations with high driveway density; (f) Scheduling construction activities at night in areas with greatest number of businesses to further reduce potential business and traffic disruptions; (g) Maintaining business access points during construction and providing appropriate access signage; (h) Using variable message signs to provide advance notice of construction activities and alternate routes; (i) Ensuring emergency response vehicles have adequate passage during the construction period; and, (j) Ensuring that alternative bike and pedestrian routes are provided as necessary, and signed, especially to the multi-use path along the Amazon Channel. 	LTD [with construction contractor]
T-6	Install design treatments in areas where two-way BRT operations are adjacent to one-way auto flow to alert users that	LTD

Measure Code	Measure	Responsibility <i>[and coordination]</i>
	BRT vehicles may be approaching from both directions. Treatments could include visual cues using signage and pavement markings such as double yellow center line indicating two-way traffic flow.	<i>[with design team and traffic specialists, in coordination with City of Eugene]</i>
T-7	Install signal controls for pedestrian and bicycle crossings of the BRT route at the intersections of 7th Avenue, 8th Avenue and Broadway Avenue.	LTD <i>[with design team and traffic specialists, in coordination with City of Eugene]</i>

Appendix D: Relevant Agency Communications Not Included in the EA

Appendix D: Relevant Agency Communications Not Included in the EA

The first four letters listed below were inadvertently omitted from the EA. The last one was received after the EA was published.

FTA March 28, 2012 letter to Oregon State Historic Preservation Officer regarding Notification of Intent to make a *De Minimis* Impact Determination

FTA May 21, 2012 letter to U.S. Fish and Wildlife Service (Oregon Fish & Wildlife Office, Endangered Species Division) regarding Lane Transit, West Eugene Emerald Express Project ESA/MSA Consultation: Finding of Not Likely to Adversely Affect Listed Species or Designated Critical Habitat

FTA May 21, 2012 letter to National Marine Fisheries Service (Oregon State Habitat Office) regarding Lane Transit, West Eugene Emerald Express Project ESA/MSA Consultation: Finding of Not Likely to Adversely Affect Listed Species or Designated Critical Habitat, and Finding of No Adverse Effect on EFH

FTA July 3, 2012 letter to National Marine Fisheries Service (Oregon State Habitat Office) regarding Lane Transit, West Eugene Emerald Express Project ESA/MSA Consultation: Withdrawal of Request for Concurrence

U.S. Fish and Wildlife Service (Oregon Fish & Wildlife Office, Endangered Species Division) August 16, 2012 letter to FTA regarding Informal Consultation and Concurrence on LTD's West Eugene EmX Extension



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Suite 3142
Seattle, WA 98174
206-220-7954
206-220-7959(fax)

March 28, 2012

Ms. Julie Osborne
Preservation Specialist
State Historic Preservation Office
725 Summer St. NE, Suite C
Salem, OR 97301-1266

**Re: SHPO Case No. 08-2640
Lane Transit District, West Eugene EmX Project:
Notification of Intent to Make a *De Minimis* Impact Determination**

Dear Ms. Osborne:

As you know, the Federal Transit Administration's has found that the West Eugene Emerald Express transit project will not adversely affect any historic resources that might be eligible for the National Register of Historic Places. The Oregon State Historic Preservation Office has reviewed and concurred with that determination in letters dated August 25, 2011 (relating to historic resources) and September 1, 2011 (relating to archaeological resources).

Our regulations¹ require us to inform you that we intend to rely on that finding of no adverse effect as the basis of a finding that the project will have only a *de minimis* impact on resources protected by Section 4(f) of the Department of Transportation Act of 1966. Please advise us if you have any concerns in that regard.

We appreciate your assistance with this project. Please contact Dan Drais of my staff at 206-220-4465 or at daniel.drais@dot.gov if you have any questions.

Sincerely,

R.F. Krochalis
Regional Administrator

cc: John Evans, Lane Transit District

¹ 23 CFR 774.5(b)(1)(ii)



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
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Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

May 21, 2012

Rollie White
Oregon Fish & Wildlife Office, Endangered Species Division
US Fish & Wildlife Service
2600 S.E. 98th Ave, Ste 100
Portland, OR 97266

**Re: Lane Transit, West Eugene Emerald Express Project
ESA/MSA Consultation: Finding of Not Likely to Adversely Affect
Listed Species or Designated Critical Habitat**

Dear Mr. White:

The Lane Transit District (LTD) in Lane County, Oregon, in cooperation with the Federal Transit Administration (FTA), proposes to build and operate an 8.8-mile (round-trip) expansion of its bus rapid transit (BRT) high-capacity public transportation service in Eugene's West 11th Avenue Corridor. The project, known as the West Eugene EmX Extension (WEEE), has received Federal funds and may receive more, making it a Federal undertaking subject to Section 7 of the Endangered Species Act (ESA). This letter initiates FTA's informal consultation under the ESA.

As explained below, FTA has determined that the project may affect, but is not likely to adversely affect, two listed fish species (bull trout (*Salvelinus confluentus*) and Oregon chub (*Oregonichthys crameri*)) or adversely modify any designated critical habitat. We seek your concurrence with these findings.

Project overview: WEEE would add an east-west extension to the existing Franklin/Gateway EmX Bus Rapid Transit (BRT) system. (BRT uses a combination of transit-only lanes, guideways, and traffic priority measures to provide fast, regular, high-frequency service that emulates light rail.) This extension, which would be 8.8 miles long (round trip), would connect residential and commercial activity centers in West Eugene to Eugene's and Springfield's central business districts and to the region's two largest employers (the University of Oregon and Peace Health Hospital). It would also help implement the Regional Transportation Plan and local, regional and state plans and goals for land use, economic development and redevelopment opportunities in the corridor.

The alignment is shown in Figure 1 (attached). WEEE would run through what is primarily a highly urbanized area, from the existing Downtown Eugene Station out to a new station at West 11th and Commerce Street. (Please note that LTD shortened the alignment considerably from its earliest iteration, thereby dramatically reducing the potential impacts on wildlife.) This corridor contains significant commercial development, several employment centers, a growing residential population, and some areas of natural resources. In the western portion of the corridor, service would run both east and west on West

11th. The eastern portion of the alignment consists primarily of a westbound segment on West 6th coupled with an eastbound segment on West 7th Avenue, and connected by short northbound and southbound legs at Charnelton and Garfield Streets. The project would require only 5.9 miles of new BRT lanes, since transit and non-transit would share lanes in some places. Riders would board at 13 new stations or, where one station could not serve both inbound and outbound traffic, station pairs. WEEE would not require a new maintenance facility or additional Park-and-Ride capacity. It would add about .9 acres of new impervious surface.

The Area of Potential Impact (API) for this project is located on both sides of West 11th Avenue and extends to about Roosevelt Boulevard on the north and West 18th Avenue to the south for the entire length of the alignment. The highly developed project area does not provide substantial habitat features. The Willamette River is about .6 miles to the east of the project's eastern terminus. The project would widen an existing crossing of Amazon Channel by West 11th Avenue.

Potentially affected species: The attached ESA Worksheet and accompanying letter from Lane Transit to FTA describe in more detail the evaluation of potential project impacts on listed species. Species under FWS jurisdiction that could be affected include: bull trout (*Salvelinus confluentus*), and Oregon chub (*Oregonichthys crameri*), as well as Fender's blue butterfly (*Icaricia icarioides fenderi*). Bull trout critical habitat has been designated in the Willamette River, which is about .6 miles from the project. While Lane County is home to several listed plant species, the project undertook extensive rare plant surveys along proposed project alignment corridors during the 2008 and 2009 growing seasons within the API. These surveys revealed that no federal or state listed plant species are in the path of the alignment or likely to be directly affected by the LPA.

Project activities: The proposed project consists primarily of reconstruction or construction of roadway and sidewalks. It would acquire small slices of right-of-way to widen the existing roadway in many places, and would require accompanying clearing and grading. In a few places it would require wetlands to be filled (totaling .05 acres). It also would include intersection improvements (e.g., new signals) to improve traffic operations. BRT service requires "stations," which are covered, unenclosed shelters in or adjacent to the right-of-way. At the western terminus, LTD will build an area large enough to accommodate bus layovers and turnarounds. New or rebuilt curb-and-gutter systems will accompany the new and reconstructed roadway; the stormwater will be collected into Eugene's stormwater system, which discharges into the Willamette.

Project activities could directly affect wildlife where the improvements cross Amazon Channel. However, no listed species of any wildlife occur in Amazon Channel. Amazon Channel drains into Willow Creek and from there to Fern Ridge Reservoir; none of these water bodies contain listed fish species.

Project activities would not directly affect fish or habitat in the Willamette River, which is more than half a mile away. However, they could conceivably impact Willamette River fish or habitat through the stormwater system. The project will therefore employ a number of mitigation measures and Best Management Practices to prevent improper substances from entering the storm system during construction. (The attached ESA Checklist describes mitigation measures on pp. 7-11, and Appendix A to the Checklist lists BMPs.) In addition, LTD would comply with Eugene requirements by treating runoff through StormFilter catchbasins, swales, or other effective system(s). Since the current roadway runoff is completely untreated, the project would therefore improve the quality of stormwater entering the Willamette.

The project would also permanently fill some wetlands. LTD would mitigate those impacts in accordance with state and federal requirements.

Summary of likely effects: Generally, the proposed action would probably have an insignificant effect on bull trout and Oregon chub due to (a) the absence of documented occurrences of listed species in Amazon Channel or downstream in Willow Creek or Fern Ridge Reservoir; (b) the slight amount of new impervious surface (less than one acre) it would add; (c) the absence of suitable spawning habitat within the API; (d) the use of best management practices to avoid or minimize erosion and sedimentation, spills, and other construction impacts; (e) the distance from construction-related activities to the Willamette River; and (f) the installation of stormwater treatment devices to treat runoff from new impervious surface as well as existing impervious surface. For the same reasons it would likely not have adverse effects on designated bull trout critical habitat in the Willamette.

The project does not extend into Fender's blue butterfly habitat, nor will it affect Fender's potential habitat (which is further to the west). Additionally, the project will not affect any Kincaid's lupine (Fender's host plant) plants or habitat. Accordingly, the project will have no effect on Fender's blue butterfly.

Table ES-1. Listed Species Regulated by FWS Potentially Occurring in the Project Vicinity

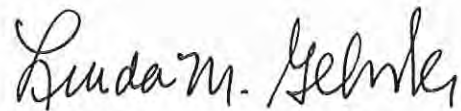
Common Name	Scientific Name	ESA Status	Jurisdiction	Critical Habitat	Effect on Species
Bull trout	<i>Salvelinus confluentus</i>	Threatened	FWS	Yes	NLAA
Oregon chub	<i>Oregonichthys crameri</i>	Threatened	FWS	No	NLAA

* Threatened: Species are likely to become endangered within the foreseeable future. ** NLAA: Not Likely To Adversely Affect,

Request for concurrence: Based on the information provided, FTA proposes a finding of **Not Likely to Adversely Affect** listed species or designated critical habitat. FTA seeks your concurrence with its proposed finding.

If you have questions, please contact Dan Drais at (206) 220-4465 or at Daniel.Drais@dot.gov.

Sincerely,

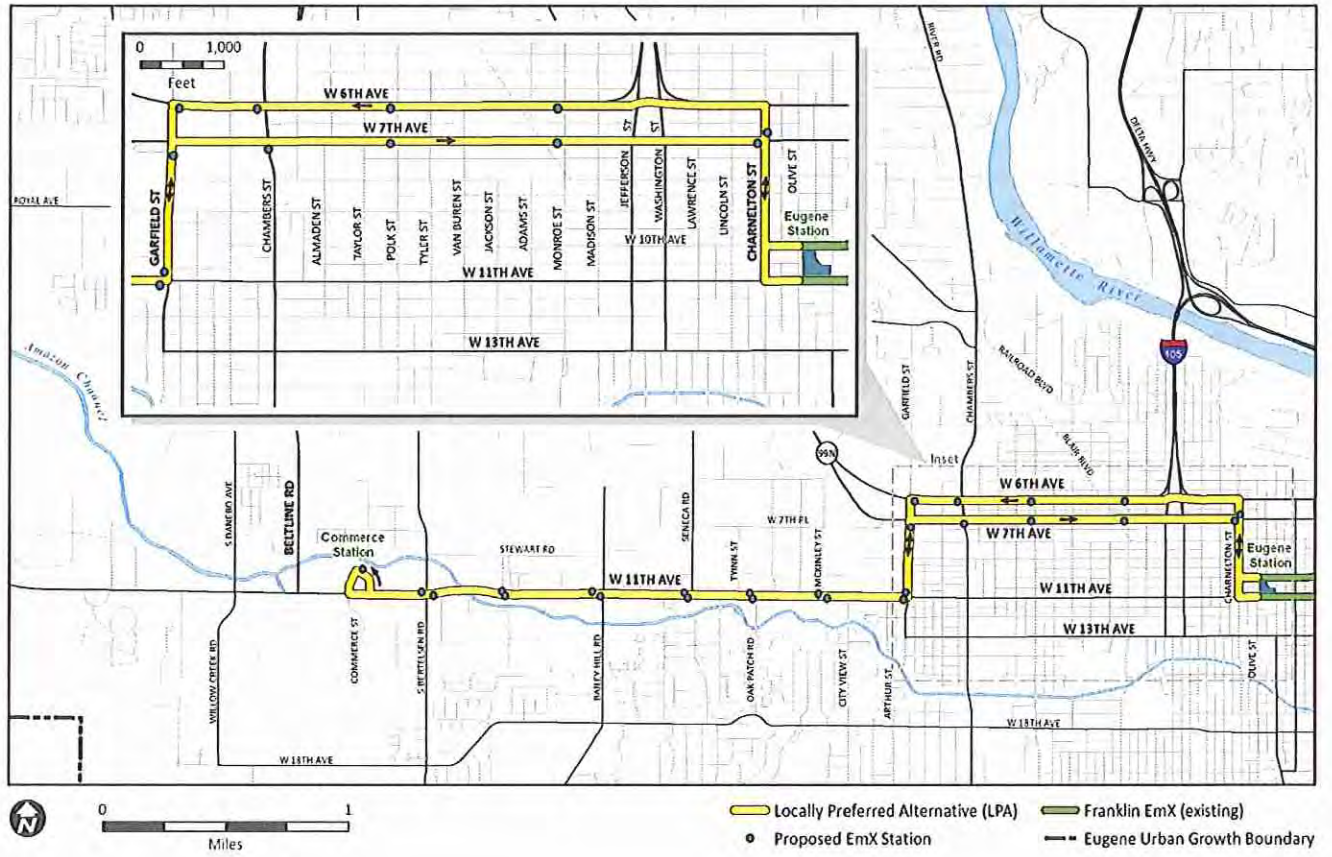


Linda Gehrke
Deputy Regional Administrator

Attachments: Letter from Lane Transit to FTA (April 20, 2012)
ESA Worksheet (April 20, 2012)
FWS Species List
Oregon Biodiversity Information Center cover letter (April 17, 2012)

cc (by email): John Evans, Lane Transit District

Figure 1: West Eugene EmX Proposed Alignment in the West 11th Corridor





U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

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206-220-7954
206-220-7959 (fax)

May 21, 2012

Kim Kratz
National Marine Fisheries Service
Oregon State Habitat Office
1201 NE Lloyd Blvd, Suite 1100
Portland, OR 97232

**Re: Lane Transit, West Eugene Emerald Express Project
ESA/MSA Consultation:
Finding of Not Likely to Adversely Affect Listed Species
or Designated Critical Habitat, and
Finding of No Adverse Effect on EFH**

Dear Ms. Kratz:

The Lane Transit District (LTD) in Lane County, Oregon, in cooperation with the Federal Transit Administration (FTA), proposes to build and operate an 8.8-mile (round-trip) expansion of its bus rapid transit high-capacity public transportation service in Eugene's West 11th Avenue Corridor. The project, known as the West Eugene EmX Extension (WEEE), has received Federal funds and may receive more, making it a Federal undertaking subject to Section 7 of the Endangered Species Act (ESA) and the Magnuson-Stevens Fishery Conservation and Management Act (MSA).

As explained below, FTA has determined that the project may affect, but is not likely to adversely affect, two listed fish species (Chinook salmon (*Oncorhynchus tshawytscha*) and steelhead (*Oncorhynchus mykiss*)), and is also unlikely to adversely modify any designated critical habitat; and that the project is not likely to adversely affect any Essential Fish Habitat. We seek your concurrence with these findings.

Project overview: WEEE would add an east-west extension to the existing Franklin/Gateway EmX Bus Rapid Transit (BRT) system. (BRT uses a combination of transit-only lanes, guideways, and traffic priority measures to provide fast, regular, high-frequency service that emulates light rail.) This extension, which would be 8.8 miles long (round trip), would connect residential and commercial activity centers in West Eugene to Eugene's and Springfield's central business districts and to the region's two largest employers (the University of Oregon and Peace Health Hospital). It would also help implement the Regional Transportation Plan and local, regional and state plans and goals for land use, economic development and redevelopment opportunities in the corridor.

The alignment is shown in Figure 1 (attached). WEEE would run through what is primarily a highly urbanized area, from the existing Downtown Eugene Station out to a new station at West 11th and

Commerce Street. (Please note that LTD shortened the alignment considerably from its earliest iteration, thereby dramatically reducing the potential impacts on wildlife.) This corridor contains significant commercial development, several employment centers, a growing residential population, and some areas of natural resources. In the western portion of the corridor, service would run both east and west on West 11th. The eastern portion of the alignment consists primarily of a westbound segment on West 6th coupled with an eastbound segment on West 7th Avenue, and connected by short northbound and southbound legs at Charnelton and Garfield Streets. The project would require only 5.9 miles of new BRT lanes, since transit and non-transit would share lanes in some places. Riders would board at 13 new stations or, where one station could not serve both inbound and outbound traffic, station pairs. WEEE would not require a new maintenance facility or additional Park-and-Ride capacity. It would add about .9 acres of new impervious surface.

The Area of Potential Impact (API) for this project is located on both sides of West 11th Avenue and extends to about Roosevelt Boulevard on the north and West 18th Avenue to the south for the entire length of the alignment. The highly developed project area does not provide substantial habitat features. The Willamette River is about .6 miles to the east of the project's eastern terminus. The project would widen an existing crossing of Amazon Channel by West 11th Avenue.

Potentially affected species: The attached ESA Worksheet and accompanying letter from Lane Transit to FTA describe in more detail the evaluation of potential project impacts on listed species. Species under NMFS jurisdiction that could be affected include Upper Willamette River Evolutionarily Significant Unit (ESU) Chinook salmon (*Oncorhynchus tshawytscha*) and Upper Willamette River Distinct Population Segment (DPS) steelhead (*Oncorhynchus mykiss*). Critical habitat is designated for Chinook salmon in the Willamette River. This part of the Willamette contains Essential Fish Habitat for Chinook.

Project activities: The proposed project consists primarily of reconstruction or construction of roadway and sidewalks. It would acquire small slices of right-of-way to widen the existing roadway in many places, and would require accompanying clearing and grading. In a few places it would require wetlands to be filled (totaling .05 acres). It also would include intersection improvements (e.g., new signals) to improve traffic operations. BRT service requires stations, which are covered, unenclosed shelters in or adjacent to the right-of-way. At the western terminus, LTD will build an area large enough to accommodate bus layovers and turnarounds. New or rebuilt curb-and-gutter systems will accompany the new and reconstructed roadway; the stormwater will be collected into Eugene's stormwater system, which discharges into the Willamette.

Project activities could directly affect wildlife where the improvements cross Amazon Channel. However, no listed species occur in Amazon Channel. Amazon Channel drains into Willow Creek and from there to Fern Ridge Reservoir; none of these water bodies contain listed species.

Project activities would not directly affect fish or habitat in the Willamette River, which is more than half a mile away. However, they could conceivably impact Willamette River fish or habitat through the stormwater system. The project will therefore employ a number of mitigation measures and Best Management Practices to prevent improper substances from entering the storm system during construction. (The attached ESA Checklist describes mitigation measures on pp. 7-11, and Appendix A to the Checklist lists BMPs.) In addition, LTD would comply with Eugene requirements by treating runoff through StormFilter catchbasins, swales, or other effective system(s). Since the current roadway runoff is completely untreated, the project would therefore improve the quality of stormwater entering the Willamette.

The project would also permanently fill some wetlands. LTD would mitigate those impacts in accordance with state and federal requirements.

Summary of likely effects: Generally, the proposed action would probably have an insignificant effect on Chinook salmon and steelhead due to (a) the absence of documented occurrences of listed species in Amazon Channel or downstream in Willow Creek or Fern Ridge Reservoir; (b) the slight amount of new impervious surface (less than one acre) the project would add; (c) the absence of suitable spawning habitat within the API; (d) the use of best management practices to avoid or minimize erosion and sedimentation, spills, and other construction impacts; (e) the distance from construction-related activities to the Willamette River; and (f) the installation of stormwater treatment devices to treat runoff from new impervious surface as well as existing impervious surface. For the same reasons it would likely not have adverse effects on designated critical habitat in the Willamette, or on essential fish Habitat.

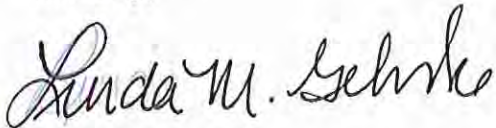
Table ES-1. ESA Species Regulated by NMFS Potentially Occurring in the Project Vicinity

Common Name	Scientific Name	ESA Status	Jurisdiction	Critical Habitat	Effect on Species
Upper Willamette River DPS Steelhead	<i>Oncorhynchus mykiss</i>	Threatened	NMFS	No	NLAA
Upper Willamette River ESU Chinook	<i>Oncorhynchus tshawytscha</i>	Threatened	NMFS	Yes	NLAA

Request for concurrence: Based on the information provided, FTA proposes a finding of **Not Likely to Adversely Affect** listed species designated critical habitat; and a finding of **not likely to adversely modify essential fish habitat**. FTA seeks your concurrence with its proposed finding.

If you have questions, please contact Dan Drais at (206) 220-4465 or at Daniel.Drais@dot.gov .

Sincerely,

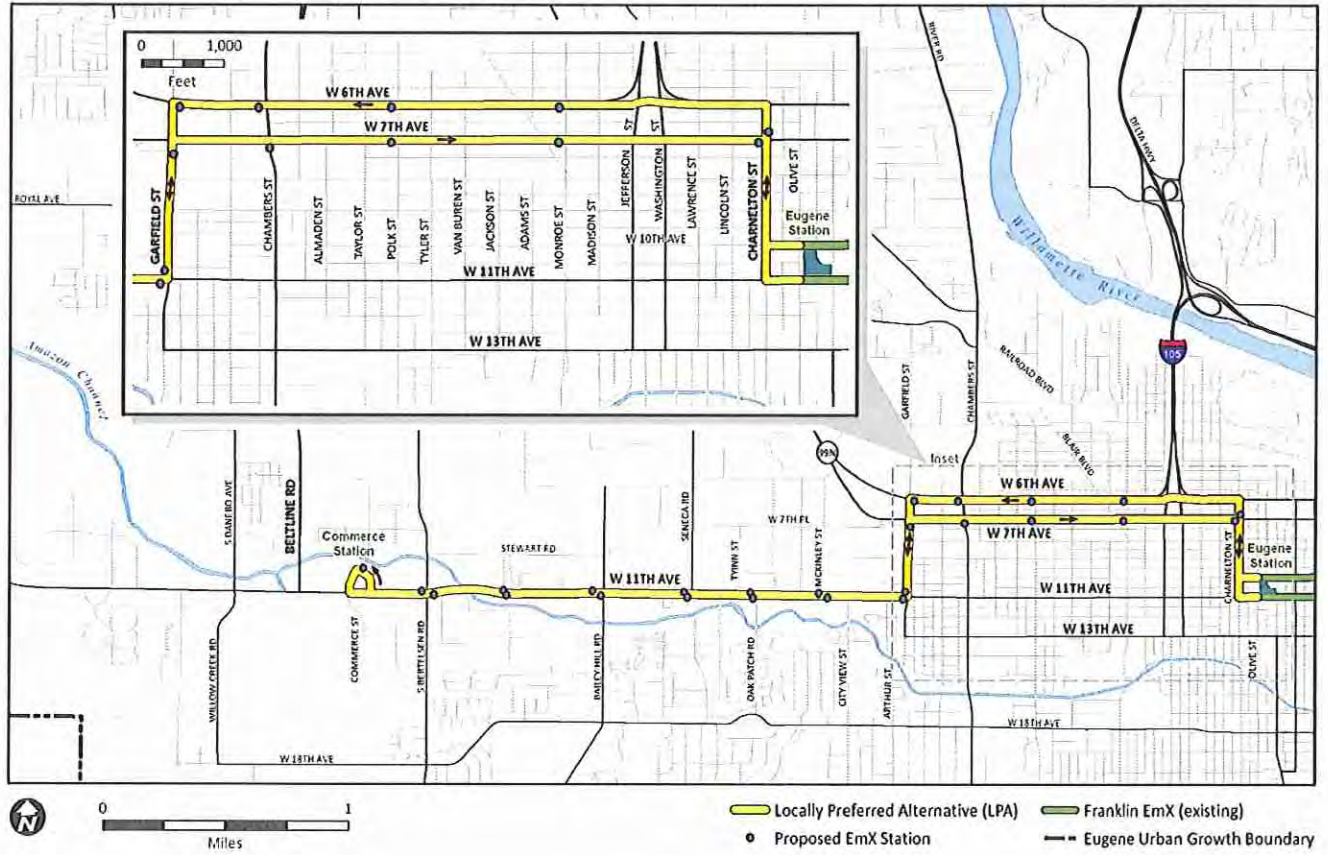


Linda Gehrke
Deputy Regional Administrator

Attachments: Letter from Lane Transit to FTA (April 20, 2012)
ESA Worksheet (April 20, 2012)
NMFS Species List

cc (by email): John Evans, Lane Transit District

Figure 1: West Eugene EmX Proposed Alignment in the West 11th Corridor





U.S. Department
of Transportation
**Federal Transit
Administration**

REGION X
Alaska, Idaho, Oregon,
Washington

915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002
206-220-7954
206-220-7959 (fax)

July 3, 2012

Dr. Kim Kratz
National Marine Fisheries Service
Oregon State Habitat Office
1201 NE Lloyd Blvd, Suite 1100
Portland, OR 97232

NMFS No. : 2012-02033
PCTS number: 0037-HCO2012)

**Re: Lane Transit, West Eugene Emerald Express Project
ESA/MSA Consultation
Withdrawal of Request for Concurrence**

Dear Dr. Kratz:

The Lane Transit District (LTD) in Lane County, Oregon, in cooperation with the Federal Transit Administration (FTA), proposes to build and operate an 8.8-mile (round-trip) expansion of its bus rapid transit (BRT) high-capacity public transportation service in Eugene's West 11th Avenue Corridor. The project, known as the West Eugene EmX Extension (WEEE), has received Federal funds and may receive more, making it a Federal undertaking subject to Section 7 of the Endangered Species Act (ESA) and the Magnuson-Stevens Fishery Conservation and Management Act (MSA).

Consistent with ESA's requirements, FTA initiated consultation with the National Marine Fisheries Service in a letter dated May 21, 2012, for the potential effects to Chinook salmon and steelhead in the Upper Willamette River, for potential effects to designated critical habitat, and pursuant to the Magnuson Stevens Fisheries Conservation and Management Act (MSA). FTA requested NMFS's concurrence with our findings that the project may affect, but is not likely to adversely affect, listed salmonids; is not likely to destroy or adversely modify critical habitat; and is not likely to adversely affect essential fish habitat.

After conversations with NMFS staff, the Corps of Engineers, City of Eugene stormwater staff, and project biologists and storm water specialists, FTA now understands that the project comes within the ambit of the programmatic biological opinion SLOPES IV. We will, therefore, pursue consultation with the Corps under SLOPES IV and seek to have the Corps submit the project for coverage under that BO. Any FTA approval or Finding of No Significant Impact will require that the project complies with the terms and conditions of SLOPES IV. We therefore withdraw our request for consultation with NMFS.

Dr. Kim Kratz
July 03, 2012
Page 2

If you require further information regarding this project application, you may contact Dan Drais of FTA at Daniel.Drais@dot.gov (206-220-4465) or Benny A. Dean Jr. of the Corps of Engineers at Benny.A.Dean@usace.army.mil (541- 465-6769). Thank you for your assistance in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "R.F. Krochalis". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

R.F. Krochalis
Regional Administrator

cc (by email): Clayton Hawkes, NMFS
Benny A. Dean, Jr., US Army Corps of Engineers
John Evans, Lane Transit District



United States Department of the Interior



FISH AND WILDLIFE SERVICE
Oregon Fish and Wildlife Office
2600 SE 98th Avenue, Suite 100
Portland, Oregon 97266
Phone: (503) 231-6179 FAX: (503) 231-6195

Reply To: 8330.2012-I-0154
File Name: W Eugene Emerald Express Project Concurrence 8-13-12
TS Number: 12-789
TAILS: 01EOFW00-2012-I-0154
Doc Type: Final

AUG 16 2012

Linda Gehrke
U.S. Department of Transportation
Federal Transit Administration
915 Second Avenue
Federal Bldg. Suite 3142
Seattle, WA 98174-1002

Subject: Informal Consultation and Concurrence on Lane Transit District's West Eugene Emerald Express Project

Dear Ms. Gehrke:

This letter responds to your May 23, 2012, request for informal consultation with the Fish and Wildlife Service (Service) on potential impacts to threatened bull trout (*Salvelinus confluentus*) and Oregon chub (*Oregonichthys crameri*) from Lane Transit District's (LTD) West Eugene Emerald Express Project. Our review and concurrence are provided pursuant to section 7 of the Endangered Species Act of 1973, as amended (16 U.S.C. 1536 *et seq.*).

The proposed action involves the construction and operation of an 8.8-mile expansion of LTD's bus line within the City of Eugene's West 11th Avenue corridor, adding about 0.9 acres of new impervious surface. The project is a component of the Regional Transportation Plan and is consistent with local, regional and state plans and goals for land use, economic development and redevelopment opportunities in the corridor.

Project activities are not expected to directly affect federally-listed fish or designated critical habitat in the Willamette River, which is more than half a mile away. However, project activities could conceivably indirectly impact Willamette River fish or habitat through the stormwater system both during and post-construction. As described in your project assessment, LTD will employ a number of mitigation measures and best management practices (BMPs) to prevent improper substances from entering the storm system during construction. In addition, LTD will comply with City of Eugene requirements by treating runoff through stormfilter catch-basins,

swales, or other effective systems. Since the current roadway runoff is completely untreated, the project will improve the quality of stormwater entering the Willamette. The 0.05 acres of wetland fill required as part of the project, will be mitigated by LTD in accordance with state and federal requirements. The only waterway with potential direct effects will be Amazon Channel which is a tributary to Willow Creek which flows into Fern Ridge Reservoir and eventually the Long Tom River. No listed aquatic species are present in any of these waterways.

Bull trout are present in the Middle Fork Willamette River upstream of Lookout Point Dam and in the McKenzie River from the McKenzie's confluence with the Willamette River upstream to the headwaters. Bull trout presence in the mainstem Willamette River in proximity to the LTD Emerald Express Project is highly unlikely based on current distribution information in our files and would be limited to winter and springs months when water temperatures are suitable. There is no documentation of Oregon chub (or Oregon chub critical habitat) within five miles of the project. The closest populations of Oregon chub are in the lower Middle Fork Willamette River below Dexter Dam and in the lower McKenzie River.

According to information presented in the BA, and additional information available in our office files, we concur with the "may affect, not likely to adversely affect" determinations for bull trout and Oregon chub and designated critical habitat for both species. Our concurrence with these determinations is based on the following:

1. The absence of documented occurrences of listed species in Amazon Channel or downstream in Willow Creek or Fern Ridge Reservoir
2. The slight amount of new impervious surface (less than one acre) it would add
3. The absences of suitable spawning habitat within the Area of Potential Impact
4. The use of best management practices (BMPs) to avoid or minimize erosion, sedimentation, spills, and other construction impacts
5. The distance from construction-related activities to the Willamette River
6. The installation of stormwater treatment devices to treat runoff from new impervious surfaces as well as existing impervious surfaces

We appreciate the chance to review LTD's project in respect to potential impacts to federally listed species and further, we apologize for the delay in providing a response to your May, 2012 request for informal consultation. If you have any questions regarding this correspondence, please contact Chris Allen of my staff at (503) 231.6179.

Sincerely,



Paul Henson, PhD.
State Supervisor

Acting
for

Cc: John Evans, Lane Transit District
Dan Draais, USDOT, Federal Transit Administration



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Lane Transit District

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