



November 30, 2018

Mr. John Tallmadge,
Interim LRT Project Director
GoTriangle
PO Box 13787
Research Triangle Park, NC 27709

Dear John,

As the advocate for equitable economic development and growth in downtown Durham, DDI has long supported the LRT project. We encourage GoTriangle and its partner agencies to address issues critical to the success of both the LRT investment and the continued economic vibrancy of downtown. We were disheartened to only have 30 days to understand and respond to changes covered in over 5,000 pages of released material, and that the review period covered both the Veterans Day and Thanksgiving holidays. Going forward, as the DO LRT project advances, it is crucial that GoTriangle be completely transparent on development and changes throughout the design and construction of LRT and regularly engage the businesses, organizations and residents located in central Durham and its adjacent neighborhoods.

DDI's Downtown Master Plan, approved by the City Council in 2017, highlights a concern that the city's current reliance on single occupancy vehicle trips is decreasing the quality of life for Durham's citizens and creating demand to build more parking and expand roadways in an attempt to mitigate congestion. These policy responses will only increase pollution and decrease the quality of life and experience in downtown. Transportation alternatives, like light rail, will bring more people downtown without using valuable land to park cars, or adding lanes of traffic.

This letter – our official response to the Supplemental Environmental Assessment – reiterates our desire to support the LRT project serving downtown, but clarifies that this support is contingent upon an adequate resolution to the concerns outlined below. Done correctly, and in conjunction with larger changes to the downtown transportation network, including making the Loop, Mangum, and Roxboro two-way and reintegrating these streets into a grid, the LRT can be a key investment linking downtown with NC Central University, Duke University, UNC-Chapel Hill and neighborhoods across Durham and Orange counties.

However, DDI has major concerns with specific changes raised in the SEA, especially as it relates to current at-grade crossings and potential impacts to traffic circulation, connectivity within the downtown core, and parking. If GoTriangle does not spend the necessary time and energy to focus specifically on these issues and is unable to provide concentrated and in-depth planning on these issues, we believe LRT could negatively impact and even reverse the significant economic gains and successes downtown Durham has experienced over the last twenty years. Our organization is committed to learning from

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both the positive and negative impacts of past infrastructure investments and strives to apply that understanding to future decision making. Many of our concerns with DO LRT are rooted in a deep desire to avoid further segmentation and separation of downtown Durham that would lead to undoing the hard work that many have done to revitalize and position downtown Durham into an economic engine for the entire region.

Below we have listed the changes, as identified in the SEA, that are of the most concern to DDI and have provided our thoughts on the necessary mitigation measures needed to address these changes. DDI's support of the DO LRT is contingent upon GoTriangle coming up with adequate mitigation measures to these changes.

1. Change: Addition of Blackwell/Mangum Station

Impacts: We feel that this change is positive as it will lead to higher ridership and better direct service to the heart of downtown Durham.

Mitigation Measures: We want to ensure that station design and access is based on Design Panel recommendations and engages design teams included in the Aesthetics Mitigation Measure below.

2. Change: Closure of Blackwell/Corcoran Street RR crossing

Impacts: We are VERY concerned about this recently identified change and the significant impacts it could have on downtown Durham. Closing this vital artery eliminates access to one of the few two-way connections for drivers/ride-hailers and pedestrians/bicyclists/scooter riders into Durham's downtown core. This connection links the north and south sides of downtown along the most pedestrian- and bicycle-friendly crossing – which is designated as both the East Coast Greenway and the Durham smART Corridor. While we provide multiple mitigation measures below, DDI believes keeping this crossing open to pedestrians and vehicles is vital to connectivity within downtown Durham. Failure to implement any of the applicable mitigation measures would jeopardize DDI's support.

Mitigation Measures:

- a. The closing of the crossing should only be implemented if no feasible alternative is demonstrated through a documented analysis using accepted professional standards and considering the latest technology with all relevant technical detail released publicly for review.
- b. If all other potential solutions to preserve the crossing are exhausted, there must be design and LRT project funding commitment that results in a signature civic space and pedestrian/bicycle/scooter crossing that improves on current travel between the north and south side of the tracks for four key travel markets:
 - i. Cyclists and others using the East Coast Greenway
 - ii. LRT riders accessing and exiting the Blackwell-Mangum station from both the north and the south sides of the RR crossing
 - iii. Pedestrians, bike-share and scooter-share users on short trips between the north and south side of the RR crossing
 - iv. Large pulses of users accessing or exiting the DPAC and DBAP (which often have events at the same time) and service to and amenities for special events such as road races and charity fundraisers involving walking, running and cycling which often start or end on Blackwell between Vivian St. and Jackie Robinson St.

The planned GoTriangle design panel and public engagement process needs to be able to achieve this result, and a revised "Basis-of-Estimate-and-Opinion-of-Probable-Project-Cost" using FTA Standard Cost Categories needs to be prepared which clearly demonstrates sufficient project resources to design, construct and maintain this crossing.

- c. With this closing, there needs to be improved connectivity at other RR crossings for auto trips to compensate for lost access at Blackwell/Corcoran, specifically by pursuing, using all reasonable alternatives and professional standards, a two-way of Mangum Street – located one block away from the Blackwell Street RR crossing – to preserve vital access/linkages between the thriving entertainment district and revitalizing downtown core.
3. Change: Conversion of Ramseur Street from one-way to two-way operation

Impacts: This change restores some westward travel that is lost by converting Pettigrew to one-way eastbound due to the LRT. However, this is only a partial conversion and doesn't extend far enough to serve as an alternative route. Design at Roxboro and Ramseur inhibits full restoration of the street grid. In addition, accommodations for pedestrians and bicycles are unclear.

Mitigation Measures: The two-way conversion needs to extend from at least Main Street (Morgan preferred) on the west to Parrish Street on the east. The new Roxboro-Ramseur connector should be southbound, not northbound, and designed to permit seamless transition to a two-way, four-lane cross-section under the RR if the existing deficient RR bridge is replaced in the future. Pedestrian and bicycle accommodations should be designed in concert with the Blackwell/Corcoran signature civic space and crossing. A Roxboro-Ramseur proposed design should be developed with a team of representatives from NCDOT, Durham Transportation, DDI, Durham County, and the NCRR and vetted through the Move Durham central Durham transportation study; the mitigation measure should commit GoTriangle to its implementation, as long as federal environmental and financial requirements are met.
4. Change: Restriction of Dillard Street RR crossing from two-way to southbound only

Impact: This change is a further restriction of downtown circulation exacerbated by other closings and restrictions along the LRT rail line.

Mitigation Measures: At a minimum, the crossing and accompanying signaling should be designed to facilitate pedestrian and bicycle movement in both directions. Closure to car traffic in the northbound direction should only be implemented if no feasible alternative is demonstrated through a documented analysis using accepted professional standards and considering the latest technology with all relevant technical detail released publicly for review.
5. Change: Deletion of parking garage at Alston Station and all parking at Dillard Street

Impacts: The elimination of parking at these two locations could have potentially severe impacts to both ridership and traffic congestion. Drivers who wish to park and ride at Alston will be unable to do so and will instead drive into downtown and add to congestion in downtown and at Duke and the VA Hospital. In addition, this could lead to costly downtown parking construction to accommodate this increase in vehicular traffic.

Mitigation Measures: Restore the level of parking at Alston to accommodate the forecast 2040 demand, while anticipating additional demand if the planned commuter rail line to RTP, NCSU and Raleigh is implemented.
6. Concern: Aesthetics

Impacts: The Visual and Aesthetics Technical Report (Appendix E) notes that several visual impacts would change from "minor" or "moderate" to "substantial" in downtown (Landscape Units #9, #10 and #11) and the revised basis for engineering appears to indicate an extensive retaining wall construction through downtown. However, the revised basis for engineering (Appendix A-3) includes no elevation drawings and the Visual and Aesthetics Technical Report includes no information on the retaining walls or visualizations of locations where the retaining walls might be most significant. We are very concerned that if not

designed in line with urban design best practices, a retaining wall through downtown would create a visual barrier and disrupt the rhythm of the built environment leading to an inhospitable active transportation environment.

Mitigation Measures: The mitigation language should be changed from “GoTriangle will implement some or all of the following...” to “GoTriangle shall implement the following...” The mitigation measure should further make clear that the proposed “interdisciplinary design teams to create aesthetic guidelines and standards for use in the design of all project elements” shall include representatives of DDI and other downtown interests for designs in Landscape Units #9, #10 and #11.

7. Concern: Joint development

Impacts: The SEA did not appear to include an updated revised “Basis-of-Estimate-and-Opinion-of-Probable-Project-Cost” using FTA Standard Cost Categories, and therefore it is unclear how the important commitment to joint development is currently reflected in the project. There appears to be no reference elsewhere in the SEA that this is a project change, which is important to help mitigate community impacts of the project.

Mitigation Measures: A mitigation measure to engage partners, including those downtown, on joint development within environmental and fiscal constraints of the project throughout the federal funding period should be included, focusing on the four sites previously identified by GoTriangle, but incorporating other eligible opportunities that might arise in station areas during project refinements.

8. Concern: Other railroad crossings along the line between Buchanan & Alston stations

Impacts: Depending on the final resolution of traffic and pedestrian/bicycle travel restrictions at Blackwell and Dillard Streets, other RR crossings will take on heightened importance. The Traffic Analysis Technical Report (Appendix C-2) indicates significant increases in delay and queue lengths at several downtown intersections compared to the previous EIS analysis. The analysis also seems to ignore the long-planned restoration of the downtown street grid to support a more walkable, pedestrian-friendly downtown core as well as the planned conversion of many one-way streets to two-way operation, likely to be implemented during the same timeframe as construction of the LRT project.

Mitigation Measures: Work closely with the City of Durham and NCDOT to ensure that all street designs, traffic and railroad signals, and pedestrian/bicycle crossings are able to seamlessly and cost-effectively accommodate the long-planned restoration of a two-way street grid as shown in community plans, except for the sections of Pettigrew Street where conversion from two-way to one-way operation is necessitated by the LRT project. To improve both auto and pedestrian/bicycle access and safety, include as part of the project a perpendicular crossing at Grant Street that intersects Peabody Street at Lyon Street.

9. Concern: RR agreements that might contain changes not described in detail in the EIS or SEA

Impacts: The public has not had an opportunity to review any proposed language in agreements between GoTriangle and NCRR and Norfolk Southern. Given the significant impact of the railroad on downtown Durham, the agreements could result in additional impacts beyond those already documented.

Mitigation Measures: The SEA should clearly state that the document includes all project changes and impacts and indicate how any subsequent changes will involve timely, meaningful engagement by all interested participants.

10. Concern: Separation of the Old Bull Building from any pedestrian and bicycle facility that is developed to mitigate the potential closure of Blackwell Street.

Impacts: A restricted design approach to developing solutions for this critical crossing could negatively impact existing historical built assets and restrict economic development opportunities on prime downtown sites.

Mitigation Measures: No arbitrary restrictions should be imposed. No evidence has been provided that there has been an historic viewshed for the Old Bull Building. In fact, extensive historic photography shows numerous structures, some two to three stories high, occupying the site immediately across Blackwell Street from the Old Bull Building. Additionally, development of the site is possible today, as is appropriate in a dense urban environment.

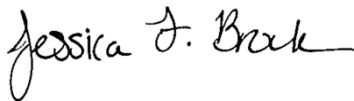
Overall, throughout the long planning process for the DO LRT, GoTriangle staff has consistently communicated to the community that the project would include tangible elements to enhance walkability and bikeability in station areas, relieve traffic congestion, contribute to affordable housing solutions and support economic development. DDI's expectations are that tangible commitments to these key goals of the project remain in the project and that the project itself not degrade pedestrian, bicycle and vehicle circulation or opportunities for affordable housing and economic development.

The "look and feel" of a downtown has always been critical to its success. The rail corridor through downtown has long been a detrimental feature, negatively affecting both physical and visual connections not only in the heart of downtown, but up and down the corridor. The LRT investment has the opportunity and the responsibility to be an investment that betters downtown and supports equitable growth, development, and vibrancy. We strongly believe that the success of LRT and downtown Durham relies on a robust exploration of alternative concepts that considers effects of the alignment through downtown, especially where street closures or conversions are proposed.

We remain committed to the concept of LRT. However to fully support LRT, we MUST see a more concerted effort and focus on the concerns and issues raised above to ensure that this project, while beneficial and important to the region, will not destroy the significant economic gains downtown Durham has made and continues to make.

We look forward to continuing to work with GoTriangle and all stakeholders to address these concerns and issues and find solutions that are mutually beneficial for all parties.

Sincerely,



Jessica Brock, Board Chair
Downtown Durham, Inc.



Nicole J. Thompson, CEO
Downtown Durham, Inc.

cc: DDI Board