

APPENDIX A: Agency Comments and Responses

Durham-Orange Light Rail Transit Project



December 2016

Agency Comments and Responses

Agency	Comment
NC Division of Water Resources	<p>The Supplemental EA is for a very minor extension of the original project study area. This extension has no new jurisdictional wetlands or streams.</p> <p>All prior comments from the original EA submitted by DWR still apply for this project and we have no additional comments or concerns.</p>

Comment ID	Comment	Comment Response
18-1	<p>The Supplemental EA is for a very minor extension of the original project study area. This extension has no new jurisdictional wetlands or streams.</p> <p>All prior comments from the original EA submitted by DWR still apply for this project and we have no additional comments or concerns.</p>	Comments noted.

Agency	Comment
NC Department of Public Safety	<p>Thank you for the opportunity to review the NCCU Refinement for the Durham Orange Light Rail Transit Project. I do not have any additional comments related to the proposed NCCU extension. Previous comments were provided in response to North Carolina Clearinghouse Review 16-E-0000-0065.</p> <p>Please let me know if you have any questions.</p>

Comment ID	Comment	Comment Response
19-1	<p>Thank you for the opportunity to review the NCCU Refinement for the Durham Orange Light Rail Transit Project. I do not have any additional comments related to the proposed NCCU extension. Previous comments were provided in response to North Carolina Clearinghouse Review 16-E-0000-0065.</p>	Comments noted.

Agency	Comment
US Environmental Protection Agency	<p>The U.S. Environmental Protection Agency (EPA) Region 4 Office has reviewed the subject document and is commenting in accordance with Section 309 of the Clean Air Act (CAA) and Section 102(2)(c) of the National Environmental Policy Act (NEPA).</p> <p>We commend the Federal Transit Administration (FTA) and GoTriangle for seeking to improve transit service in Durham and Orange County. We understand that based in comments received during the draft Environmental Impact Statement (DEIS), a feasibility study was conducted to assess the potential for extending the alignment eastward in order to link North Carolina Central University (NCCU), with the other major universities on the route, thus providing substantially improved mobility and access for students to participate in academic endeavors at these campuses. The new termini also would increase transit operating efficiency by eliminating a bus transfer at the Alston Avenue Station.</p> <p>The NCCU extension prompted a supplemental EA to extend the project terminus 0.7 miles south of the proposed Alston Avenue Station, over NC 147 (Durham Freeway), to a new station at the Alston Avenue/Lawson Street intersection. The rail extension and the corresponding NCCU Station is consistent with the Durham-Chapel Hill-Carrboro (DCHC) Metropolitan Planning Organization’s update to the long range transportation plan. Access to the NCCU Station would be at-grade and located in the median of Alston Avenue. Consequently, the station would be a “walk up” with no parking facilities provided. The EPA understands that existing bus stops would be modified to make walking to/from the station more convenient. The 2010 US Census Bureau notes that 50% of the households within a half-mile radius of the proposed station do not own a personal vehicle. McDougal Terrace, a 360-unit public housing property, is located two blocks east of Alston Avenue.</p> <p>The impacts to the human environment include 29 residential and five business relocations. One historic property—the Durham Water Tower and Valve House—is located within the project area. Consultation with the State Historic Preservation Office yielded a determination of no adverse effect. The rail extension and NCCU Station is not anticipated to result in noise impacts to the surrounding community as all of the residential and commercial properties that front the west side of Alston Avenue between NC 147 and Lawson Street will be acquired for the proposed project. The NCCU Station and rail extension is located within an Environmental Justice (EJ) community. Based on feedback received during GoTriangle’s public outreach, the EPA understands that the local community generally supports the extension of the project to include NCCU as it is expected to provide substantially better access to jobs and educational opportunities, medical services, recreation, and shopping centers through enhanced mobility and system linkage.</p> <p>There are no impacts to the natural environment as the project is located within a highly urbanized area.</p> <p>The EPA acknowledges the commitments to minimize and mitigate impacts to the human environment. We appreciate the opportunity to comment on this project. If you have any questions concerning these comments, please feel free to contact me.</p>

Comment ID	Comment	Comment Response
21-1	We commend the Federal Transit Administration (FTA) and GoTriangle for seeking to improve transit service in Durham and Orange County. We understand that based in comments received during the draft Environmental Impact Statement (DEIS), a feasibility study was conducted to assess the potential for extending the alignment eastward in order to link North Carolina Central University (NCCU), with the other major universities on the route, thus providing substantially improved mobility and access for students to participate in academic endeavors at these campuses. The new termini also would increase transit operating efficiency by eliminating a bus transfer at the Alston Avenue Station.	Comments noted.

Comment ID	Comment	Comment Response
21-2	The NCCU extension prompted a supplemental EA to extend the project terminus 0.7 miles south of the proposed Alston Avenue Station, over NC 147 (Durham Freeway), to a new station at the Alston Avenue/Lawson Street intersection. The rail extension and the corresponding NCCU Station is consistent with the Durham-Chapel Hill-Carrboro (DCHC) Metropolitan Planning Organization’s update to the long range transportation plan. Access to the NCCU Station would be at-grade and located in the median of Alston Avenue. Consequently, the station would be a “walk up” with no parking facilities provided. The EPA understands that existing bus stops would be modified to make walking to/from the station more convenient. The 2010 US Census Bureau notes that 50% of the households within a half-mile radius of the proposed station do not own a personal vehicle. McDougal Terrace, a 360-unit public housing property, is located two blocks east of Alston Avenue.	Comments noted.

Comment ID	Comment	Comment Response
21-3	The impacts to the human environment include 29 residential and five business relocations. One historic property—the Durham Water Tower and Valve House—is located within the project area. Consultation with the State Historic Preservation Office yielded a determination of no adverse effect. The rail extension and NCCU Station is not anticipated to result in noise impacts to the surrounding community as all of the residential and commercial properties that front the west side of Alston Avenue between NC 147 and Lawson Street will be acquired for the proposed project. The NCCU Station and rail extension is located within an Environmental Justice (EJ) community. Based on feedback received during GoTriangle’s public outreach, the EPA understands that the local community generally supports the extension of the project to include NCCU as it is expected to provide substantially better access to jobs and educational opportunities, medical services, recreation, and shopping centers through enhanced mobility and system linkage.	Comments noted.

Comment ID	Comment	Comment Response
21-4	There are no impacts to the natural environment as the project is located within a highly urbanized area.	Comments noted.

Comment ID	Comment	Comment Response
21-5	The EPA acknowledges the commitments to minimize and mitigate impacts to the human environment.	Comments noted.

Agency	Comment
Catawba Indian Nation	<p>The Catawba have no immediate concerns with regard to traditional cultural properties, sacred sites or Native American archaeological sites within the boundaries of the proposed project areas. However, the Catawba are to be notified if Native American artifacts and/or human remains are located during the ground disturbance phase of this project.</p> <p>If you have questions, please contact Caitlin Totherow at 03-328-2427 ext. 226, or e-mail caitlinh@ccppcrafts.com.</p>

Comment ID	Comment	Comment Response
22-1	The Catawba have no immediate concerns with regard to traditional cultural properties, sacred sites or Native American archaeological sites within the boundaries of the proposed project areas. However, the Catawba are to be notified if Native American artifacts and/or human remains are located during the ground disturbance phase of this project.	Comments noted.

Agency	Comment
Durham Housing Authority	<p>The purpose of this letter is to express the support of the Durham Housing Authority (DHA) for the extension of the Durham-Orange (D-O) Light Rail Transit (LRT) Project from the Alston Avenue station to a station at North Carolina Central University (NCCU).</p> <p>The proposed NCCU Station, at the intersection of Alston Avenue and Lawson Street, will be within two blocks of McDougald Terrace, Durham's largest multifamily public housing community. The McDougald Terrace site is currently slated for redevelopment as a mixed income housing community. Adding the NCCU LRT station will provide our residents and other people living and working within the surrounding neighborhoods with a competitive, affordable and reliable alternative to driving or having to own a car. It will improve and expand access to employment opportunities and provide residents with connections to healthcare, shopping and other important destinations. The NCCU Station will also extend the reach of employers particularly in Durham and Counties who are seeking to maintain and expand their workforce.</p> <p>We believe that extending D-O LRT Project from the Alston Avenue station to include a station at NCCU is an important addition to the D-O LRT Project. It will help people living and working in our communities to get to work, support their families and build a healthy and more secure future.</p>

Comment ID	Comment	Comment Response
25-1	The purpose of this letter is to express the support of the Durham Housing Authority (DHA) for the extension of the Durham-Orange (D-O) Light Rail Transit (LRT) Project from the Alston Avenue station to a station at North Carolina Central University (NCCU).	Thank you for your support.

Comment ID	Comment	Comment Response
25-2	The proposed NCCU Station, at the intersection of Alston Avenue and Lawson Street, will be within two blocks of McDougald Terrace, Durham's largest multifamily public housing community. The McDougald Terrace site is currently slated for redevelopment as a mixed income housing community. Adding the NCCU LRT station will provide our residents and other people living and working within the surrounding neighborhoods with a competitive, affordable and reliable alternative to driving or having to own a car. It will improve and expand access to employment opportunities and provide residents with connections to healthcare, shopping and other important destinations. The NCCU Station will also extend the reach of employers particularly in Durham and Counties who are seeking to maintain and expand their workforce.	Comments noted.

Comment ID	Comment	Comment Response
25-3	We believe that extending D-O LRT Project from the Alston Avenue station to include a station at NCCU is an important addition to the D-O LRT Project. It will help people living and working in our communities to get to work, support their families and build a healthy and more secure future.	Comments noted.

Agency	Comment
NC Division of Parks and Recreation	No comment.

Comment ID	Comment	Comment Response
26-1	No comment.	Comment noted.

Agency	Comment
NC Department of Public Safety, Division of Emergency Management, Floodplain Management Program	No comment.

Comment ID	Comment	Comment Response
27-1	No comment.	Comment noted.

Agency	Comment
--------	---------

NC Department of Environment and Natural Resources	[See individual comments]
--	---------------------------

Comment ID	Comment	Comment Response
------------	---------	------------------

28-1	Any open burning associated with subject proposal must be in compliance with 15 A NCAC 2D.1900	GoTriangle will obtain all required permits and complete all construction activities in accordance with Federal, State, and local requirements. Additional information on the precise methods of and activities associated with construction will be developed as part of engineering.
------	--	--

Comment ID	Comment	Comment Response
------------	---------	------------------

28-10	-The project is in the Cape Fear (Jordan Lake) and Neuse Basins (Falls Lake). Compliance with riparian buffer rules is required as well as water supply watershed rules.	Comments noted. GoTriangle will obtain all required permits and complete all construction activities in accordance with Federal, State, and local requirements. Additional information on the precise methods of and activities associated with construction will be developed as part of engineering.
-------	--	--

Comment ID	Comment	Comment Response
------------	---------	------------------

28-11	-If wetland or stream impacts are proposed, this project will need to comply with/secure a 404 permit from the USACE and obtain a 401 Water Quality Certification authorization.	As identified in Chapter 3 of the Supplemental EA, no wetland or stream impacts are anticipated as part of the NCCU Station Refinement.
-------	--	---

Comment ID	Comment	Comment Response
------------	---------	------------------

28-12	Although noted in the reports, the plan item was selected to provide additional detailed instructions.	Comment noted.
-------	--	----------------

Comment ID	Comment	Comment Response
------------	---------	------------------

28-13	Notify the UST Section at the Raleigh Regional Office if petroleum-contaminated soil or groundwater is encountered demolition or construction activities.	Comment noted. GoTriangle will obtain all required permits and complete all construction activities in accordance with Federal, State, and local requirements. Additional information on the precise methods of and activities associated with construction will be developed as part of engineering.
-------	---	---

Comment ID	Comment	Comment Response
28-2	Demolition or renovations of structures containing asbestos material must be in compliance with 15A NCAC 20.1110(a)(1) which requires notification and removal prior to demolition. Contact Asbestos Control Group 919-707-5950.	GoTriangle will obtain all required permits and complete all construction activities in accordance with Federal, State, and local requirements. Additional information on the precise methods of and activities associated with construction will be developed as part of engineering.

Comment ID	Comment	Comment Response
28-3	The Sedimentation Pollution Control Act of 1973 must be properly addressed for any land disturbing activity. An erosion & sedimentation control plan will be required if one or more acres to be disturbed. Plan filed with proper Regional Office (Land Quality Section) At least 30 days before beginning activity. A fee of \$65 for the first acre or any part of an acre. An express review option is available with additional fees.	GoTriangle will obtain all required permits and complete all construction activities in accordance with Federal, State, and local requirements. An erosion and sedimentation control plan will be prepared prior to the beginning of construction. Additional information on the precise methods of and activities associated with construction will be developed as part of engineering.

Comment ID	Comment	Comment Response
28-4	Abandonment of any wells, if required must be in accordance with Title 15A Subchapter 2C.0100.	GoTriangle will obtain all required permits and complete all construction activities in accordance with Federal, State, and local requirements. Additional information on the precise methods of and activities associated with construction will be developed as part of engineering.

Comment ID	Comment	Comment Response
28-5	Notification of the proper regional office is requested if "orphan" underground storage tanks (USTS) are discovered during any excavation operation.	Comment noted.

Comment ID	Comment	Comment Response
28-6	Plans and specifications for the construction, expansion, or alteration of a public water system must be approved by the Division of Water Resources/Public Water Supply Section prior to the award of a contract or the initiation of construction as per 15A NCAC 18C.0300 et. seq. Plans and specifications should be submitted to 1634 Mail Service Center, Raleigh, North Carolina 27699-1634. All public water supply systems must comply with state and federal drinking water monitoring requirements. For more information, contact the Public Water Supply Section, (919) 707-9100.	Comments noted. GoTriangle will obtain all required permits and complete all construction activities in accordance with Federal, State, and local requirements. Additional information on the precise methods of and activities associated with construction will be developed as part of engineering.

Comment ID	Comment	Comment Response
28-7	If existing water lines will be relocated during construction, plans for the water line relocation must be submitted to the Division of Water Resources/Public Water Supply Section at 1634 Mail Service Center, Raleigh, North Carolina 27699-1634. For more information, contact the Public Water Supply Section, (919) 707-9100.	Comment noted. GoTriangle will obtain all required permits and complete all construction activities in accordance with Federal, State, and local requirements. Additional information on the precise methods of and activities associated with construction will be developed as part of engineering.

Comment ID	Comment	Comment Response
28-8	Please see comments from transportation permitting unit in DWR's Central Office	Comment noted.

Comment ID	Comment	Comment Response
28-9	-NCDOT projects are required to comply with the individually issued stormwater permit. This permit includes erosion and sedimentation control expectations for projects that disturbs 1 acre or greater. The project is required to comply with erosion and sedimentation control plan, monitoring and maintenance expectations.	Comments noted. GoTriangle will obtain all required permits and complete all construction activities in accordance with Federal, State, and local requirements. Additional information on the precise methods of and activities associated with construction will be developed as part of engineering.

Agency	Comment
NC Division of Waste Management, Solid Waste Section	<p>The Division of Waste Management, Solid Waste Section (Section) has reviewed the environmental assessment documents submitted on behalf of GO Triangle for the proposed Durham Orange Light Rail Transit Project. Based on the information provided, the Section does not see an adverse impact on the surrounding community and likewise knows of no situations in the community, which would affect this project.</p> <p>During the clearing, demolition and construction of this project, GO Triangle and/or its contractors should make every feasible effort to minimize the generation of waste, to recycle materials for which viable markets exist, and to use recycled products and materials in the development of this project where suitable. Any waste generated by this project that cannot be beneficially reused or recycled must be disposed of at a solid waste management facility permitted by the Division. The Section strongly recommends that GO Triangle require all contractors to provide proof of proper disposal for all generated waste to permitted facilities.</p> <p>Permitted solid waste management facilities are listed on the Division of Waste Management, Solid Waste Section portal site at: https://deq.nc.gov/about/divisions/waste-management/waste-management-rules-data/solid-waste-management-annual-reports/solid-waste-permitted-facility-list.</p> <p>Questions regarding solid waste management for this project should be directed to Mrs. Mary Whaley, Environmental Senior Specialist, Solid Waste Section, at (919) 693-5023.</p>

Comment ID	Comment	Comment Response
29-1	The Division of Waste Management, Solid Waste Section (Section) has reviewed the environmental assessment documents submitted on behalf of GO Triangle for the proposed Durham Orange Light Rail Transit Project. Based on the information provided, the Section does not see an adverse impact on the surrounding community and likewise knows of no situations in the community, which would affect this project.	Comments noted.

Comment ID	Comment	Comment Response
29-2	During the clearing, demolition and construction of this project, GO Triangle and/or its contractors should make every feasible effort to minimize the generation of waste, to recycle materials for which viable markets exist, and to use recycled products and materials in the development of this project where suitable. Any waste generated by this project that cannot be beneficially reused or recycled must be disposed of at a solid waste management facility permitted by the Division. The Section strongly recommends that GO Triangle require all contractors to provide proof of proper disposal for all generated waste to permitted facilities.	Comments noted. GoTriangle will obtain all required permits and complete all construction activities in accordance with Federal, State, and local requirements. Additional information on the precise methods of and activities associated with construction will be developed as part of engineering.

Agency	Comment
NC Division of Waste Management, Superfund Section	<p>The Superfund Section has reviewed the proximity of CERCLIS and other sites under its jurisdiction to the proposed Durham Orange Light Rail Transit Project, eastern terminus. The proposed design refinement involves extending the location of the eastern terminus by adding a station on South Alston Avenue near North Carolina Central University (NCCU).</p> <p>Fourteen sites were identified within an approximate 1-mile radius of the proposed project as noted on the map and in the table below. The identified sites are not anticipated to affect the project or vice versa, however, if the construction encounters groundwater, it is recommended that site files be reviewed so that appropriate health and safety precautions can be implemented as needed. Superfund Section files can be viewed at: https://deq.nc.gov/about/divisions/waste-management/waste-management-rules-data/e-documents.</p> <p>Please contact me at 919.707.8377 if you have any questions.</p>

Comment ID	Comment	Comment Response
30-1	Fourteen sites were identified within an approximate 1-mile radius of the proposed project as noted on the map and in the table below. The identified sites are not anticipated to affect the project or vice versa, however, if the construction encounters groundwater, it is recommended that site files be reviewed so that appropriate health and safety precautions can be implemented as needed.	Comments noted.

Agency	Comment
NC Division of Waste Management, Hazardous Waste Section	<p>The Hazardous Waste Section (HWS) has reviewed the Supplemental EA for the Durham Orange Light Rail Transit Project in Durham County.</p> <p>Any hazardous waste generated from the demolition, construction, operation, maintenance, and/or remediation (e.g. excavated soil) from the proposed project must be managed in accordance with the North Carolina Hazardous Waste Rules. The demolition, construction, operation, maintenance, and remediation activities conducted will most likely generate a solid waste, and a determination must be made whether it is a hazardous waste. If a project site generates more than 220 pounds of hazardous waste in a calendar month, the HWS must be notified, and the site must comply with the small quantity generator requirements. If a project site generates more than 2200 pounds of hazardous waste in a calendar month, the HWS must be notified, and the facility must comply with the large quantity generator requirements.</p> <p>The proposed project site does not currently have an existing EPA Identification numbers for the generation of hazardous waste.</p> <p>Should any questions arise, please contact me at 252-364-8977.</p>

Comment ID	Comment	Comment Response
31-1	<p>Any hazardous waste generated from the demolition, construction, operation, maintenance, and/or remediation (e.g. excavated soil) from the proposed project must be managed in accordance with the North Carolina Hazardous Waste Rules. The demolition, construction, operation, maintenance, and remediation activities conducted will most likely generate a solid waste, and a determination must be made whether it is a hazardous waste. If a project site generates more than 220 pounds of hazardous waste in a calendar month, the HWS must be notified, and the site must comply with the small quantity generator requirements. If a project site generates more than 2200 pounds of hazardous waste in a calendar month, the HWS must be notified, and the facility must comply with the large quantity generator requirements.</p>	<p>Comments noted. GoTriangle will obtain all required permits and complete all construction activities in accordance with Federal, State, and local requirements. Additional information on the precise methods of and activities associated with construction will be developed as part of engineering.</p>

Agency	Comment
NC Department of Environmental Quality, Division of Environmental Assistance and Customer Service	<p>The Department of Environmental Quality has reviewed the proposal for the referenced project. Based on the information provided, several of our agencies have identified permits that may be required and offered some guidance to minimize impacts to the natural resources within the project area. The comments are attached for the applicant's review.</p> <p>The Department's agencies will continue to be available to assist the applicant through the environmental review processes.</p> <p>Thank you for the opportunity to respond.</p>

Comment ID	Comment	Comment Response
32-1	<p>The Department of Environmental Quality has reviewed the proposal for the referenced project. Based on the information provided, several of our agencies have identified permits that may be required and offered some guidance to minimize impacts to the natural resources within the project area. The comments are attached for the applicant's review.</p> <p>The Department's agencies will continue to be available to assist the applicant through the environmental review processes.</p> <p>Thank you for the opportunity to respond.</p>	<p>Comments noted. GoTriangle will obtain all required permits and complete all construction activities in accordance with Federal, State, and local requirements. Additional information on the precise methods of and activities associated with construction will be developed as part of engineering.</p>

Agency	Comment
State Environmental Review Clearinghouse	<p>The above referenced environmental impact information has been submitted to the State Clearinghouse under the provisions of the National Environmental Policy Act. According to G.S. 113A-10, when a state agency is required to prepare an environmental document under the provisions of federal law, the environmental document meets the provisions of the State Environmental Policy Act. Attached to this letter for your consideration are comments made by the agencies in the course of this review.</p> <p>If any further environmental review documents are prepared for this project, they should be forwarded to this office for intergovernmental review.</p> <p>Should you have any questions, please do not hesitate to call.</p>

Comment ID	Comment	Comment Response
------------	---------	------------------

33-1

The above referenced environmental impact information has been submitted to the State Clearinghouse under the provisions of the National Environmental Policy Act. According to G.S. 113A-10, when a state agency is required to prepare an environmental document under the provisions of federal law, the environmental document meets the provisions of the State Environmental Policy Act. Attached to this letter for your consideration are comments made by the agencies in the course of this review.

Comments noted.

If any further environmental review documents are prepared for this project, they should be forwarded to this office for intergovernmental review.

Should you have any questions, please do not hesitate to call.

Agency	Comment
State Historic Preservation Office	<p>We have received notification from the State Clearinghouse concerning the above-referenced document and provide the following comments.</p> <p>We note that the most recent coordination between the Federal Transit Administration, GoTriangle and State Historic Preservation Officer did not make it into the Supplemental Environmental Assessment. Thus, we provide our comments here and note that we expect the necessary documentation to appear in the Finding of No Significant Impact for the NCCU Refinement.</p> <p>As a result of our review of the historic structures report for the Area of Potential Impacts for the NCCU Refinement, we determined the Russell Memorial CME Church (DH3663) at 703 South Alston Avenue to be eligible for listing in the National Register of Historic Places under Criterion C for Architecture. We also determined that the proposed undertaking would not adversely affect the church in that no work would extend beyond the brick retaining wall along South Alston Avenue.</p> <p>The above comments are made pursuant to Section 106 of the National Historic Preservation Act and the Advisory Council on Historic Preservation's Regulations for Compliance with Section 106 codified at 36 CFR Part 800.</p> <p>Thank you for your cooperation and consideration. If you have questions concerning the above comment, contact Renee Gledhill-Earley, environmental review coordinator, at 919-807-6579 or envLronmental.review@nfdcr.gov. In all future communication concerning this project, please cite the above referenced tracking number.</p>

Comment ID	Comment	Comment Response
34-1	We note that the most recent coordination between the Federal Transit Administration, GoTriangle and State Historic Preservation Officer did not make it into the Supplemental Environmental Assessment. Thus, we provide our comments here and note that we expect the necessary documentation to appear in the Finding of No Significant Impact for the NCCU Refinement.	Comments noted. Section 106 coordination documentation is included in Appendix E of the Amended ROD.

Comment ID	Comment	Comment Response
34-2	As a result of our review of the historic structures report for the Area of Potential Impacts for the NCCU Refinement, we determined the Russell Memorial CME Church (DH3663) at 703 South Alston Avenue to be eligible for listing in the National Register of Historic Places under Criterion C for Architecture. We also determined that the proposed undertaking would not adversely affect the church in that no work would extend beyond the brick retaining wall along South Alston Avenue.	Comments noted. The disposition of the Russell CME church as an eligible historic resource is documented in the Amended Record of Decision.

Agency	Comment
NC Department of Transportation, Statewide Planning	No comment.

Comment ID	Comment	Comment Response
35-1	No comment.	Comment noted.

Agency**Comment**

City of Durham, Department of Transportation

The City of Durham appreciates the efforts that GoTriangle has made to add a station at North Carolina Central University to the Durham-Orange Light Rail Transit project. The addition of this station greatly benefits the project as a whole, provides access to one of our City's most important educational and employment destinations, and increases mobility for residents of Durham. We look forward to continuing to work with GoTriangle staff on this element of the project in Project Engineering.

However, we do have some questions and concerns about the extension. We are offering the following comments on NCCU Station Refinement Supplemental Environmental Assessment for the Durham-Orange Light Rail Transit project with the intention to work cooperatively with GoTriangle staff on resolving these issues during Project Engineering.

Water Management Concerns

1. Will there be any requests to acquire property from the Pettigrew Tank Site?
2. We are concerned about the security of the Pettigrew Tank. There is concern that the elevated position of the parking deck would provide the opportunity for people to damage the elevated water tank. We request that GoTriangle install a physical/visible barrier on each floor of the parking deck on the side facing the Pettigrew Tank.
3. The Stormwater Management facility, adjacent to the parking deck, cannot discharge onto or through the Pettigrew Tank property. This includes any emergency spillways.
4. No soil nails will be allowed to encroach on the Pettigrew Tank property.
5. All water and sewer mains located within Alston Avenue alignment must be relocated to avoid conflicts with the light rail. All water and sewer main relocations must allow for the reconnection of the existing water and sewer services.
6. All relocated water mains must be sized such that the fire flow requirements of the existing uses are met.

Transportation Concerns

1. 1,200 parking spaces are proposed at the Alston Avenue Station, an increase of 220 from the FEIS/ROD. The Alston Station must serve the nearby neighborhood in addition to the park-and-ride lot. We would like to see less surface parking at the station and more attention to making the station a neighborhood hub and amenity. The proposed station orientation does not lend itself well to redevelopment of the surface parking lots. We request further investigation of alternative site plans for the Alston Station during Project Engineering.
2. Spillover parking near the NCCU Station is a concern for the City. The City already maintains a Controlled Residential Parking Area around NCCU. <http://durhamnc.gov/DocumentCenter/Home/View/4431> The station is likely to attract more parking to the area. We expect that GoTriangle will partner with the City and NCCU to address parking concerns caused by the station.
3. Storing train cars on the tail track proposed at the NCCU Station may present a visual impact to the neighborhood and may compromise vehicular safety at the Alston/Lawson intersection by obscuring sight lines. We urge GoTriangle to identify a less visible location for the storage of train cars.
4. Bicycle lanes on Alston Avenue are recommended in the Durham Comprehensive Bicycle Transportation Plan. However, we recognize that bicycle lanes unfortunately were not included in the NCDOT project to widen Alston

Avenue from NC 147 to the north, and Alston Avenue is a high-volume route with an interchange with NC 147 that is not pedestrian or bicycle-oriented. The proposed Bryant Bridge Trail to the east and proposed Pearisontown Trail/Grant Street to the west will provide safer north-south bicycle and pedestrian connections. The Bryant Bridge Trail is a funded TIP project and should be constructed before the DO LRT project. In lieu of bicycle lanes on Alston Avenue, the project needs to include improved bicycle and pedestrian connectivity from the NCCU Station to these trails using Lawson Street and Linwood Avenue. This will also help improve access to the stations from nearby low-income housing communities and Durham Technical Community College.

5. The sidewalk on the east-side of Alston Avenue is not proposed to be re-constructed or improved. With the attraction of a station at NCCU, pedestrian traffic on this side of the street will greatly increase and a wider sidewalk must be constructed. The City's standard is for a minimum 10 foot wide sidewalk in Compact Design Districts. Streetscape elements should also be included on this sidewalk.

6. Linwood Avenue will become a more used intersection for pedestrians and vehicles with the construction of the project. The pedestrian crossing at this intersection must be safe and convenient.

7. The traffic simulation report identifies LOS and vehicle queuing impact for multiple movements at the Alston/Lawson and Alston/Linwood intersections. We expect more discussion of potential mitigation measures for these impacts.

8. The City of Durham is concerned about the relocations on the west side of Alston Avenue caused by the project – both the neighborhood/community impact as well as the visual/aesthetic impact. In addition, the flyover structure for the LRT over NC 147 and landing in the median of Alston Avenue will have a substantial visual impact. For vehicles exiting NC 147 headed towards NCCU, Alston Avenue will be their gateway to Durham. It is critical that the west side of Alston Avenue be improved to include an inviting gateway as well as provide a neighborhood resource. This could be a linear park with attractive landscaping, playgrounds, decorative walls or other features, etc. The City expects to have input on the design and materials of the retaining wall and columns used for the flyover structure and that additional costs for decorative or aesthetic treatments will be included in the project cost.

9. As noted, gentrification and land use changes induced by the project are a concern for the City of Durham. The NCCU Station is not currently included in the City's land use planning documents and major changes in land use are not currently proposed for the station area. GoTriangle's ridership models thus generally reflect the current land uses in the station area and show that a strong transit market already exists. We expect that GoTriangle will cooperate with the City's land use planning efforts to minimize displacement and gentrification caused by the station and ensuring that the increased transit service remains available to the current residents of the neighborhoods.

Comment ID	Comment	Comment Response
36-1	The City of Durham appreciates the efforts that GoTriangle has made to add a station at North Carolina Central University to the Durham-Orange Light Rail Transit project. The addition of this station greatly benefits the project as a whole, provides access to one of our City's most important educational and employment destinations, and increases mobility for residents of Durham. We look forward to continuing to work with GoTriangle staff on this element of the project in Project Engineering.	Comments noted.

Comment ID	Comment	Comment Response
36-10	3.Storing train cars on the tail track proposed at the NCCU Station may present a visual impact to the neighborhood and may compromise vehicular safety at the Alston/Lawson intersection by obscuring sight lines. We urge GoTriangle to identify a less visible location for the storage of train cars.	Comment noted. GoTriangle will further develop the transit operation plan during Engineering and will coordinate with the City on issues related to vehicular and intersection safety including train storage.

Comment ID	Comment	Comment Response
36-11	4.Bicycle lanes on Alston Avenue are recommended in the Durham Comprehensive Bicycle Transportation Plan. However, we recognize that bicycle lanes unfortunately were not included in the NCDOT project to widen Alston Avenue from NC 147 to the north, and Alston Avenue is a high-volume route with an interchange with NC 147 that is not pedestrian or bicycle-oriented. The proposed Bryant Bridge Trail to the east and proposed Pearsontown Trail/Grant Street to the west will provide safer north-south bicycle and pedestrian connections. The Bryant Bridge Trail is a funded TIP project and should be constructed before the DO LRT project. In lieu of bicycle lanes on Alston Avenue, the project needs to include improved bicycle and pedestrian connectivity from the NCCU Station to these trails using Lawson Street and Linwood Avenue. This will also help improve access to the stations from nearby low-income housing communities and Durham Technical Community College.	As stated in section 3.1.4 of the Supplemental EA, to mitigate the loss of opportunity for on-street bicycle facilities on Alston Avenue, GoTriangle will work with the City of Durham, NCDOT, and local advocates to identify the potential for off-street facilities or on-street facilities on parallel or nearby roadways.

Comment ID	Comment	Comment Response
36-12	5. The sidewalk on the east-side of Alston Avenue is not proposed to be re-constructed or improved. With the attraction of a station at NCCU, pedestrian traffic on this side of the street will greatly increase and a wider sidewalk must be constructed. The City's standard is for a minimum 10 foot wide sidewalk in Compact Design Districts. Streetscape elements should also be included on this sidewalk.	In the Amended ROD (Table Amended ROD-1), GoTriangle will commit to working with Durham City-County Planning to evaluate future land use and station area infrastructure needs in the NCCU Station Refinement area.

Comment ID	Comment	Comment Response
36-13	6. Linwood Avenue will become a more used intersection for pedestrians and vehicles with the construction of the project. The pedestrian crossing at this intersection must be safe and convenient.	As noted in the Supplemental EA (section 3.1.4), station areas would be designed according to best management practices for pedestrian and bicycle safety.

Comment ID	Comment	Comment Response
36-14	7. The traffic simulation report identifies LOS and vehicle queuing impact for multiple movements at the Alston/Lawson and Alston/Linwood intersections. We expect more discussion of potential mitigation measures for these impacts.	As noted in the Supplemental EA (section 3.1.2), during Engineering, GoTriangle will coordinate with the City of Durham, NCDOT, and major institutional stakeholders regarding other roadway projects in the area as well as modifications to the roadways to accommodate the NCCU Station Refinement.

Comment ID	Comment	Comment Response
36-15	8. The City of Durham is concerned about the relocations on the west side of Alston Avenue caused by the project – both the neighborhood/community impact as well as the visual/aesthetic impact. In addition, the flyover structure for the LRT over NC 147 and landing in the median of Alston Avenue will have a substantial visual impact. For vehicles exiting NC 147 headed towards NCCU, Alston Avenue will be their gateway to Durham. It is critical that the west side of Alston Avenue be improved to include an inviting gateway as well as provide a neighborhood resource. This could be a linear park with attractive landscaping, playgrounds, decorative walls or other features, etc. The City expects to have input on the design and materials of the retaining wall and columns used for the flyover structure and that additional costs for decorative or aesthetic treatments will be included in the project cost.	GoTriangle committed to coordinating with municipalities and those affected to further minimize visual effects, incorporate landscaping and aesthetic treatments, and identify Art-in-Transit opportunities (Combined FEIS/ROD Table ROD-1). GoTriangle will further commit in the Amended ROD (Table Amended ROD-1) to working with Durham City-County Planning to evaluate future land use plans in the NCCU Station Refinement area.

Comment ID	Comment	Comment Response
36-16	<p>9.As noted, gentrification and land use changes induced by the project are a concern for the City of Durham. The NCCU Station is not currently included in the City’s land use planning documents and major changes in land use are not currently proposed for the station area. GoTriangle’s ridership models thus generally reflect the current land uses in the station area and show that a strong transit market already exists. We expect that GoTriangle will cooperate with the City’s land use planning efforts to minimize displacement and gentrification caused by the station and ensuring that the increased transit service remains available to the current residents of the neighborhoods.</p>	<p>As detailed in section 3.2 of the Supplemental Environmental Assessment (Supplemental EA), existing zoning and future land use in the vicinity of the NCCU Station Refinement are primarily medium density residential (six to 12 units per acre) and institutional (NCCU campus). These uses are transit-supportive but would not allow for higher density uses that would be expected to develop at other proposed stations along the D-O LRT Project. As noted in section 3.3 of the Supplemental EA, GoTriangle acknowledges that the existing zoning and future land use in vicinity of the NCCU Station Refinement may also result in redevelopment pressures that would replace rental and lower-income households with higher-income households. Mitigation commitments from the Combined FEIS/ROD, including working with municipalities to identify policies to promote redevelopment, infill, and economic development opportunities around affected areas, would remain applicable to the NCCU Station refinement. GoTriangle also committed in the Supplemental EA to coordinating with the Durham City-County Planning Department to evaluate potential updates to their future land use plan and station area infrastructure needs in the NCCU Station Refinement area.</p>

Comment ID	Comment	Comment Response
36-2	<p>1.Will there be any requests to acquire property from the Pettigrew Tank Site?</p>	<p>GoTriangle will continue to coordinate with the City of Durham through Engineering on the design of the proposed parking deck and to minimize the potential for impacts to this site.</p>

Comment ID	Comment	Comment Response
36-3	<p>2.We are concerned about the security of the Pettigrew Tank. There is concern that the elevated position of the parking deck would provide the opportunity for people to damage the elevated water tank. We request that GoTriangle install a physical/visible barrier on each floor of the parking deck on the side facing the Pettigrew Tank.</p>	<p>GoTriangle recognizes the City's concerns and will continue to work with the City throughout Engineering on the design of the proposed parking deck.</p>

Comment ID	Comment	Comment Response
36-4	3. The Stormwater Management facility, adjacent to the parking deck, cannot discharge onto or through the Pettigrew Tank property. This includes any emergency spillways.	Stormwater discharge onto or through the Pettigrew Tank property is not anticipated. GoTriangle will continue to coordinate with the City through Engineering to minimize the potential for impacts to the Pettigrew Tank property.

Comment ID	Comment	Comment Response
36-5	4.No soil nails will be allowed to encroach on the Pettigrew Tank property.	At this time, no such items are planned. GoTriangle will continue to coordinate with the City through Engineering to minimize the potential for impacts to the Pettigrew Tank property.

Comment ID	Comment	Comment Response
36-6	5.All water and sewer mains located within Alston Avenue alignment must be relocated to avoid conflicts with the light rail. All water and sewer main relocations must allow for the reconnection of the existing water and sewer services.	Comments noted. GoTriangle will continue to coordinate with the City through Engineering to address utility impacts within Alston Avenue.

Comment ID	Comment	Comment Response
36-7	6.All relocated water mains must be sized such that the fire flow requirements of the existing uses are met.	Comment noted. All utility relocations and other utility work will be completed in accordance with all Federal, State, and local requirements. GoTriangle will coordinate with the City through Engineering to address the potential for utility impacts.

Comment ID	Comment	Comment Response
36-8	1.1,200 parking spaces are proposed at the Alston Avenue Station, an increase of 220 from the FEIS/ROD. The Alston Station must serve the nearby neighborhood in addition to the park-and-ride lot. We would like to see less surface parking at the station and more attention to making the station a neighborhood hub and amenity. The proposed station orientation does not lend itself well to redevelopment of the surface parking lots. We request further investigation of alternative site plans for the Alston Station during Project Engineering.	GoTriangle will coordinate with the City of Durham during Engineering on final designs for the Alston Avenue Station and parking area.

Comment ID	Comment	Comment Response
36-9	2.Spillover parking near the NCCU Station is a concern for the City. The City already maintains a Controlled Residential Parking Area around NCCU. Http://durhamnc.gov/DocumentCenter/Home/View/4431 The station is likely to attract more parking to the area. We expect that GoTriangle will partner with the City and NCCU to address parking concerns caused by the station.	As noted in the Combined FEIS/ROD Table ROD-1, GoTriangle will work with the municipalities to develop appropriate mitigation measures if spillover parking becomes a concern.