RECEIVED 1301 NW 40th St.

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1301 NW 40th S Vancouver, Wa 98660

Columbia River Crossing Project C/o Heather Gundersen, Environmental Manager 700 Washington Street, Suite 300 Vancouver, WA 98660

Dear Ms Gundersen;

N-024-001 The following are the comments of the Lincoln Neighborhood Association (LNA) on the Columbia River Crossing (CRC) Draft Environmental Impact Statement (DEIS). The LNA has been involved in numerous meetings with CRC Staff, Vancouver City Staff and other Neighborhood Associations in Vancouver during the past year. We have conducted a survey of the 1500 households in the LNA with responses back from over 10% of the households in the LNA. Our Transportation Committee has met many times to prepare materials for LNA meetings, interview CRC and Vancouver Transportation Department staff about the project, develop the household survey and prepare LNA position statements such as these comments. We would like to thank the CRC and City Staff members for their help and expertise in reviewing the project alternatives, especially the alternatives with the most impact on our neighborhood.

N-024-002 In 1998 the LNA submitted our Neighborhood Action Plan to the City and the Vancouver City Council accepted it at that time. The following three paragraphs are from that Plan

Lincoln is a neighborhood with a long history. A place of homes, schools, churches, and some businesses. Lincoln is a neighborhood of people which are long-time residents and new comers; apartment dwellers and home owners; singles, young families and homes with teen-agers, empty nesters, and senior citizens; and we are all individuals, entitled to our own aims, ways, peace, and safety.

The neighborhood is primarily single family in nature and represents a mature urban neighborhood with tree lined streets although some multifamily apartments reside in the neighborhood as well. The portion of the neighborhood next to the railroad tracks supports light and medium industrial uses. The neighborhood supports a variety of housing styles and ages from new sub-divisions such as Columbia Crest to homes built in the 1930's. There are commercial interests in the neighborhood such as two small markets, various office buildings including Washington State Department of Transportation, and medical and dental offices.

Discovery Middle School and Lincoln Elementary are situated within the neighborhood. Lincoln Elementary has many recreational amenities such as tennis courts, soccer fields and a playground. There are two additional open spaces; a small neighborhood park called Hidden Park and another small area located to the east of Washington Street yet undeveloped. Hidden Park has deferred maintenance needs such as a sign and deteriorating play equipment.

N-024-001

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Thank you for taking the time to submit your comments on the I-5 CRC DEIS.

N-024-002

Neighborhoods often define themselves and strengthen their identities through the development of neighborhood plans, which is why they are discussed in Chapter 3 (Section 3.5) of the DEIS and in the CRC Neighborhoods and Population Technical Report (2008). These plans are formally adopted by neighborhood associations recognized by the City. When the DEIS was written, every neighborhood in the project area had an adopted plan, except for Rose Village, Columbia Way and East Columbia. Although not a neighborhood plan, The Hayden Island Plan, adopted by the City of Portland August 19, 2009, includes goals, objectives, proposed comprehensive plan and zoning changes, and an implementation strategy.

While some plan goals may be unique to a certain neighborhood, other goals are common to many communities. These plans have been reviewed to determine community resources and the priorities of different communities. Neighborhood plans were also used in the determination of light rail as the preferred transit mode. The plans have also provided the project team with guidance throughout the refinement of final design as described in Chapter 3 (Section 3.5) of the FEIS.

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N-024-002	Two objectives from that Plan are to
	1, Avoid construction of intrusive, out-of-scale structures in the neighborhood. While this neighborhood has a great diversity of styles of buildings, over-sized and overly tall structures are definitely out of place here. Such buildings are a threat to the general appearance of the neighborhood and to property values.
	2. New parks and recreational facilities that are accessible, easily seen and safe for neighbors of all ages should be developed. Seek access to and development of water department green spaces on Washington Street for use as a neighborhood park.
	Our comments on the DEIS are based on these elements that show the long-term commitment we have to livability of our neighborhood.
N-024-003	When we started our involvement in this process a year ago, CRC staff was informing us that a park and ride lot on the Washington State Department of Transportation (WSDOT) property in the LNA would be on 17 acres with potential for 4,000 spaces. At a LNA meeting in August 2007, this proposal was not supported by about 73% of those polled in the 134 people in attendance. Reasons put forward were:
	Size, (Largest on West Coast)
	 Traffic impacts on the Neighborhood,
	 Safety impacts on five pre-school to high school facilities surrounding the park and ride site. (these include the school at the Presbyterian Church, Lincoln Elementary School, Discovery Middle School, Vancouver School of Arts and Academics, and Our Lady of Lourdes School.)
	 Design criteria for such a large park and ride lot were not provided.
N-024-004	Since that time we have requested many times to have a discussion about the specific rationale that is being used to determine the need for park and ride lots and parking spaces required for the dedicated high capacity transit (HCT) to work. We have been provided with a range of parking space numbers from 900 to 2400 during the year. At no time have we been provided with the criteria used to select these numbers. The DEIS does not provide any discussion of the specific rationale or design criteria used to size the proposed park and ride lot options. In fact, in order to
N-024-005	find even the proposed size of park and ride lots we have had to look at the Traffic and Transit Technical reports. This has made it very difficult for us to comment in any specific way on what the LNA would support or accept as mitigation for impacts on our neighborhood.
N-024-006	Our comments on park and ride lot sizing and what we would expect for mitigation are based on Exhibit 18, Full-Length and MOS Northern Terminus Option LRT Representative HCT Mode. We have used this exhibit to focus our concerns, but any HCT alternate selected during the process of developing a Locally Preferred Alternative and/or the Final Environmental Impact Statement (FEIS) should take into consideration these comments.
	The number of park and ride spaces shown in Exhibit 18 range from 1250 to 3218 for the four HCT terminal alternatives presented. The Lincoln Park and Ride lot for Vancouver Full Length LRT alternative would be 1800. The Clark College LRT MOS would be 1100. Such a wide range of numbers implies an equally broad range of criteria for sizing the lots. CRC staff have told us that park and ride lot sizing depends on increasing the population density of an area to

2 of 9 N-024-003

Preferences for specific alternatives or options, as expressed in comments received before and after the issuance of the DEIS, were shared with local sponsor agencies to inform decision making. Following the close of the 60-day DEIS public comment period in July 2008, the CRC project's six local sponsor agencies selected a replacement I-5 bridge with light rail to Clark College as the project's Locally Preferred Alternative (LPA). These sponsor agencies, which include the Portland City Council, Vancouver City Council, TriMet Board, C-TRAN Board, Metro Council, RTC Board, considered the DEIS analysis, public comment, and a recommendation from the CRC Task Force when voting on the LPA.

With the LPA, new bridges will replace the existing Interstate Bridges to carry I-5 traffic, light rail, pedestrians and bicyclists across the Columbia River. Light rail will extend from the Expo Center MAX Station in Portland to a station and park and ride at Clark College in Vancouver. Pedestrians and bicyclists would travel along a wider and safer path than exists today.

The CRC project modeled how drivers would access the three proposed Park and Ride lots in Vancouver during the morning peak commute. Two of the three Park and Rides – Clark College and SR-14 – are located adjacent to major thorough fares (I-5 and SR 14). The Mill Plain Park and Ride, though not adjacent to I-5 or a state route, is located between two major arterials, Mill Plain and Fourth Plain Boulevards. This modeling confirmed the majority of drivers (70%-95%) would access the Park and Rides from major roads including I-5, SR 14, SR 500, Mill Plain and Forth Plain.

For a more detailed description of highway, transit, and bicycle and pedestrian improvements associated with the LPA, see Chapter 2 of the FEIS.

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N-024-007	levels that sustain the need for HCT. While this comment is not in the DEIS or technical reports it is the only criteria we have been provided with for this project.							
N-024-008	Since there is no discussion of criteria for park and ride lots in the DEIS and related studies that we could find we have reviewed various state transportation department and local jurisdiction documents containing criteria for lot size and access considerations Two of these are representative of the ones we have reviewed. They are the Massachusetts Design Manual Chapter 12 (MA) and the Park and Ride Selection and Design Criteria, Maricopa Association of Governments, Phoenix, Arizona (AZ). A few selections from these documents are attached at the end of our comments for better understanding of our position.							
N-024-009	Our conclusions about the size of park and ride lots that would be acceptable to the LNA are as follows:							
N-024-010	 Size of the CRC HCT park and ride lots should be limited to the standard size lot noted in MA and AZ documents of between 300 and 500 spaces. This size limitation is based on site access requirements that require entrances and exits at least 300 feet from any intersection (MA) to an absolute limit of 150 feet from other intersections (AZ). This size limitation is based on requirements that no parking space require a user to walk more than 300 feet to the bus or light rail station. This size limitation is based on our understanding that vehicular access to the Lincoln Park and Ride lot will only be on Main Street. This size limitation is based on our request that a portion of the WSDOT property at the Lincoln Park and Ride Lot will be used as a park. This size limitation is based on the comment on page 3-417 that construction close to the City of Vancouver well field could increase possible contamination of the City well field. A smaller park and ride lot would reduce this risk. 							
N-024-010	during the past year. A copy of an earlier letter and poll results that we have submitted is attached and should be included in the record of this DEIS.							
N-024-011	While it may be true that the overall project will reduce air emissions from vehicles, we do not believe that will be the case at 39 th and Main streets where queuing will be up to 1,100 feet and level of service will be F for up to 2 hours. (Exhibit 6-29 Traffic Technical Report) This is another consideration for having smaller park and ride lots. We are concerned about the impact of having potentially two park and rides (the WSDOT property as a terminus and the Kiggins property as a satellite lot) and HCT on our neighborhood streets. While Main Street would be widened, causing the loss of businesses, traffic capacity on Main would be reduced. This will impede local traffic needing access to homes and services, including schools, and will lead to a dramatic increase of traffic on neighboring streets.							
N-024-012 N-024-013	We are concerned that there are statements in the DEIS at several points that if a proposed alternative does not exceed impacts of the no action alternative then no mitigation for the impact well be considered. For instance, it is noted that Columbia Street should become an arterial street as a result of actions taken in the no action alternative. So any impact of the proposed							

N-024-004

Thank you for your comment. The park and ride lot which you are referencing is no longer under consideration as a part of the CRC project.

N-024-005

The level of detail in the DEIS was intended to inform the public and other stakeholders with relevant information in order to understand the impacts and trade-offs associated with various alternatives. While some readers felt that the DEIS did not have enough detail, others felt that it was too long and detailed. For those who wanted more detail, the DEIS referred them to the technical reports that informed the analysis presented in the DEIS. These were made available on CD and on the project web site, as well as in hard copy. For those who felt that the DEIS was too detailed, an executive summary was distributed along with the DEIS and made available separately in hard copy and on the project website.

Public open houses and numerous public meetings were also held to provide opportunities for public participation. Additionally, the project team attempted to respond to questions about the location of certain information in the DEIS during the DEIS comment period. Staff, with the help of the Community and Environmental Justice Group, also developed a reader friendly table of contents and DEIS guide, to help individuals locate the information most important to them, develop and submit comments on the DEIS, and to understand next steps. Both of these documents were distributed with DEIS materials as inserts, and were available on the project website.

N-024-006

Thank you for taking the time to submit your comments on the I-5 CRC DEIS.

alternative would not be mitigated. We expect that no action means no action. Therefore N-024-013 changes to the designation of Columbia Street should be mitigated for as a result of this proposal.

N-024-014 We look forward during the next few years to working with the CRC and/or successor agencies in developing mitigation for this project.

Sincerely. Parc Howard Dave Howard Vice Chair Lincoln Neighborhood Association

Ken Becker, Transportation Committee Chair Lincoln Neighborhood Association

CC: Vancouver City Council Dean Lookingbill Jeff Hamm

Attachments

N-024-007

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Thank you for your comment.

N-024-008

Thank you for your comment.

N-024-009

Thank you for your comment. Preferences for specific alternatives or options, as expressed in comments received before and after the issuance of the DEIS, were shared with local sponsor agencies to inform decision making.

N-024-010

Thank you for taking the time to submit your comments on the I-5 CRC DEIS.

N-024-011

Thank you for your comment. The terminus for the light rail alignment was chosen as Clark College with the associated park and ride located at that terminus. Light Rail is no longer proposed for Main Street or anywhere in the Lincoln Neighborhood.

N-024-012

Mitigation includes a variety of measures intended to avoid impacts, minimize impacts, and compensate for impacts that cannot be avoided. Most mitigation measures address specific impacts, and many are developed in response to specific regulatory requirements. Even with this level of specificity, there is some flexibility to evaluate the full collection of mitigation measures in a larger context. For example, the proposed stormwater management approach has been evaluated for its potential benefits not only to water quality, but also to fish, wildlife and aesthetics. Similarly, the project has worked closely with regulatory

N-024-015 Sources used for Lincoln Neighborhood Association comments on Draft Environmental Impact Statement for Columbia River Crossing Project.

Source Massachusetts Highway Design Manual Chapter 12:

Site Access/Egress: Separate driveway exits and entrances should be provided, preferably on different streets if possible. The entrance driveway should be on the upstream side of the traffic flow nearest the lot, and the exit driveway on the downstream side. There should be at least one exit and one entrance for every 500 parking spaces provided. All exits and entrances should be designed according to the criteria in Chapter 6 (At Grade Intersections). These criteria include capacity, corner sight distance, turning radii, and exclusive left- and right-turn lanes on the intersecting highway or street. An exit or entrance for a park-and-ride lot should desirably be at least 300 feet from any other intersection.

Source: Selection and Design Criteria Maricopa Association of Governments Phoenix, Arizona

Capacity

Park-and-Ride lot capacity is initially determined by analyzing the present and projected population, existing and projected transit rider ship and travel characteristics of the area to be served and the use of other park-and-ride lots in the area. Lots usually have 300 to 600 stalls, but exceptions in both directions are possible. Land availability can be a factor affecting the ultimate capacity of any given lot. As a rule of thumb, one acre can accommodate 90 to 100 autos in a park-and-ride configuration. Capacity should also be sited in response to customer needs or demands.

Vehicle Parking

Park-and-Ride parking aisles should be perpendicular to the passenger waiting area. It is recommended that parking spaces be at 90-degree angles and served by two-way aisles no more than 400 feet long. Bus patrons would have a maximum walk of 300 feet. This parking layout allows vehicles to circulate in the parking area away from the passenger waiting area. Motorists would approach a parking space generally driving towards the waiting area, park, and then continue walking in that direction to the passenger waiting area. The reverse movement would occur for people leaving the buses. This circulation pattern minimizes conflicts between pedestrians and motorists.

General Vehicle Access

Vehicles may access the parking area by at least one two-way driveway located away from the passenger waiting area. Vehicles can circulate within the lot away from the pedestrians, thereby minimizing conflicts between vehicles and pedestrians.

A sufficient number of entrances and exists should be provided so that the volume per lane does not exceed 250 vehicles per hour where sufficient street frontage exists. The number of entrances agencies to identify habitat mitigation measures that address not only the project's impacts on habitat, but also the larger context of how project mitigation could provide even greater benefit to fish and wildlife by addressing watershed-level priority mitigation. The inherent purpose of mitigation is to address specific unavoidable adverse impacts of the project but this has not prevented the project from developing an integrated mitigation package.

N-024-013

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By its definition, the No-Build alternative is meant to illustrate the environmental effects and performance of not implementing the CRC build alternatives. Therefore, it would not be a No-Build alternative if it included any of the CRC proposed improvements. However, No-Build does include all other actions that are separately planned, including the other elements of the regional transportation plan and the metropolitan transportation plan, as well as actions planned by the City of Vancouver, the City of Portland, or other parties. Also, a variety of alternatives that did not include substantial highway related improvements were included in the early screening analysis for CRC and were dropped because they were unable to meet the purpose and need of the proposed action.

N-024-014

Since the Draft EIS public comment period, CRC staff have attended several meetings of the Lincoln Neighborhood Association. In addition, a member of the neighborhood association served on the Vancouver Working Group. Mitigation strategies were discussed during at least one these neighborhood association meeting and during some of the deliberations of the Vancouver Working Group.

N-024-015

The sources and assumptions used are noted.

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N-024-015 and exists should match circulation requirements. Wherever a park-and-ride lot has more than 300 parking stalls, at least two exits should be provided.

Access/Egress

The best alternative, which will both intercept automobile traffic and minimize interference to local traffic flow, will be evaluated at each site. Evaluation criteria should include consideration of traffic safety, minimization of traffic congestion, convenience for bus patrons, and impact on local land use.

Locating a facility on the right side for traffic inbound on a two-way arterial will allow most users to make a right turn into the lot, thus eliminating the hazard of crossing an opposing traffic stream. It is likely that maximizing the accessibility for the inbound trips will be more effective in attracting users than improving the flow for the exiting evening traffic.

Entrances and exits should be located, with regard to adjacent intersections, so that signal control of the exit could reasonably be installed at a later time if necessary. Storage for vehicles entering from the street and adequate queue storage for exiting vehicles should be planned.

Entrances and exits should be at least 150 feet apart and not closer than 150 feet to a public intersection, all measured curb to curb. However, 350 feet is desirable in both instances. Access spacing will be based on jurisdiction standards. Whenever a park-and-ride lot has more than 300 parking stalls, at least two entrance drives and two exit drives should be provided. As a guide, the volume per lane should not exceed 300 vehicles per hour. It is desirable for park-and-ride lots with capacities greater than 1,000 parking stalls to have entrance and exit points to two or more adjacent streets in order to allow for uncongested traffic dispersal. The intersection capacities of entrances and exits from the roadway system should be computed for all lots and an adequate

level of service provided in the design.

Landscaping

Landscaping for any park-and-ride facility serves a number of purposes. It not only adds to the aesthetic quality of the project, but it also serves to mitigate climatological factors. Landscaping can also help create the project's unique identity and serve to screen the project from adjacent uses. Landscaping should be designed in such a manner so that hiding places for persons engaged in criminal activity will be minimized. Use of low ground covers and trees with high canopies balance visibility, security, site design and buffering. Landscaping can provide an effective means for establishing pedestrian paths and walking patterns within the site.

1 Plant materials should complement the design and character of the surrounding community.

Native species, which are drought resistant and require low maintenance, should be used to the maximum extent possible.

3. Shade provided by trees allows opportunity for solar protection without a closed interior environment. Upon maturity, trees can lower temperatures in shaded areas at least 10 degrees.

N-024-015

4. Trees also provide climate enhancement in an arid region by shading pavement and reducing heat gain as well as the carbon content of the air.

5. Shade trees are an important landscape element due to the fact that they provide canopy protection without obstructing visibility.

6. Low shrubs and ground covers may be used in moderation as long as they do not obstruct visibility through the site.

7. Properly selected plant materials may require less maintenance than structures.

8. For trees located in an urban paved environment, the minimum exposed soil dimensions around the tree should be 10 feet by 10 feet. This is required to maintain a greater survival rate and ensure that trees reach full maturity.

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This letter was submitted seperately as a comment on the DEIS. Please see N-003 for responses to the comments in this letter.

N-024-016 Lincoln Neighborhood Association c/o 203 West 34th Street Vancouver WA 98660 May 14, 2008 City Council & Columbia River Crossing Agency Vancouver WA 98660

The Vancouver Lincoln Neighborhood Association has had numerous neighborhood meetings in the past year, focused on the CRC, with its representatives, and City of Vancouver Transportation Department staff, to help us understand the project and its potential impact on our neighborhood.

LNA has surveyed its residents for feedback on current options for the Columbia River Crossing and mass transit as an aid for the City Council to understand our position as a neighborhood. Attendees at our April meeting were surveyed in person, and subsequent input was requested through our newsletter, with the option of on-line or paper surveys. 159 respondents representing 152 households responded. The complete results are attached.

Most (65%) of the respondents prefer a replacement bridge. Most prefer LRT to BRT, but a small percentage oppose light rail under any circumstances. A large majority prefer a terminus outside of Lincoln neighborhood due to concerns for existing neighborhood disruption, traffic issues, and security concerns. If a Lincoln lot is used, most prefer a small footprint with a park. If HCT is routed through Uptown Village, most prefer it to be not entirely on Main. Overall, we prefer an alignment that preserves our neighborhood quality of life.

The surveying involved a great amount of work by volunteers, well aided by city staff. The similarity between results at the meeting and online/paper survey gives us confidence that these results are representative of the approximately 1500 households in our neighborhood. As a neighborhood, our primary desire would be to see that any changes that must occur only enhance its character and quality, rather than detract from it. We see the changes brought by a parking facility, mass transit, or significant realignment of our transportation systems as substantially changing the neighborhood character. We may individually differ as to our support or opposition to this project but as a neighborhood we want an active role in defining how it will occur and what mitigation is possible. We look forward to working together with you on making this happen and would appreciate a response soon as to how you see that occurring. Please consider carefully the impact on our neighborhood, and opinions of your constituents, when evaluating your options.

Lincoln Neighborhood Association

Jenny Brown, President

24-i916 May 2	936 Neighborhood Association ay 2008 Transportation Survey Results		Meeting		line	Pa	Paper		Combined	
41.110	about we do with the substant bold 0	-		-			-			
	should we do with the existing bridge?	1000	-	-	-		1	in mark	-	
	ice the I-5 Interstate bridge with a new bridge	67%	28	74%	53	50%	21	65%	10	
b. Add	new bridge for southbound; use the old ones for northbound	31%	13	22%	16		19	31%	48	
c. Rebu	Id the existing bridges; do not add new capacity of any type	2%	42	4%	3	5%	2	4%	15	
2) How	often per week do you drive to Oregon?	-	-				-			
	han once per week	21%	9	24%	17	40%	17	27%	43	
	nes per week	40%	17	19%	14	23%	10	26%	41	
	nes per week	21%	9	21%	15	14%	6	19%	30	
	iore times per week	17%	7	36%	26	23%	10	27%	43	
9.3011	iore times per week	100%	42	100%		100%	43	100%	15	
connec	e as well as the best example you can think of, could light rail ing Vancouver to Portland be acceptable?		1						1	
a. Yes		73%	30	93%	68	67%	30	81%	128	
b. No		27%	11	7%	5	33%	15	19%	31	
_		100%	41	100%	73	100%	45	100%	159	
	should we recommend for mass transit on the bridge only?									
a. LR (lig		69%	27	78%	57	45%	19	67%	103	
	pus rapid transit)	26%	10	21%	15	45%	19	29%	44	
	ss transit of any type	5%	2	0%	0	5%	2	3%	4	
	ommendation	0%	0	1%	1	5%	2	2%	3	
		100%	39	100%	73	100%	42	100%	154	
	ass transit north of the bridge at this location:									
	College area	33%	14	29%	21	34%	13	31%	48	
	s Bowl area	.7%	3	7%	5	0%	0	5%	8	
c. Park 8	Ride on WSDOT site (Lincoln: Main & 40 ^m area)	10%	4	12%	9	0%	0	8%	13	
d. Downi	own somewhere	10%	4	5%	4	5%	2	7%	10	
e. Anywit	ere outside my neighborhood	2%	1	1%	1	13%	5	5%	7	
	e it north beyond city limits	38% 100%	16	45%	33 73	47%	18	44% 100%	67 153	
		100.76	42	100%	15	100%	30	100%	100	
6) If park	ing is at WSDOT, we prefer:					-	-			
	e surface level lot; the best blended landscaping we can develop	13%	5	13%	9	11%	4	12%	18	
	level lot using less land; more green space, preferably a park	26%	10	61%	43	49%	17	48%	70	
c. Size m	atters; as small as possible, regardless of configuration	62% 100%	24 39	27%	19	40%	14 35	39% 100%	57	
7) 14/1-1				-						
	s my greatest concern with parking at WSDOT site?	160/	P	000/	24	0.10/	0	000/	20	
	y; increased crime	15%	6	33%	24	21%	6	26%	36	
	traffic and pedestrian	10%	4	5%	4	4%	1	6%	9	
	and pedestrian volume	26%	10	19%	14	18%	5	21%	29	
	ion of existing neighborhood	36%	14	23%	17	29%	8	28%	39	
	egress roads to facility	5%	2	19%	14	29%	8	17%	24	
f. Other		8%	3	0%	0	0%	0	2%	3	
		100%	39	100%	73	100%	28	100%	140	
	is to continue north to Fourth Plain or beyond, should it:		1.11							
	oth directions of traffic on Main	8%	3	13%	9	11%	4	1.1%	16	
	oth directions of traffic on Broadway	59%	22	39%	27	36%	13	43%	62	
c. Have o	ne direction of traffic on Main and one on Broadway	32%	12 37	49%	34 70	53%	19 36	45%	65 143	
		1,9496.00	ser	1.919.70		1999 (8	40	10070	. 40	
	we even have a neighborhood position on this subject?					-	-	-		
	ade by those who participated in the process	93%	38	89%	63	98%	43	92%	144	
b. No		7%	3	11%	8	2%	1	8%	12	
		100%	41	100%	71	100%	44	100%	156	