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January 3, 2014

Mr. Myron S. Pakush
District Deputy Director District 12
Ohio Department of Transportation
5500 Transportation Blvd.
Garfield Heights, OH 44125

Dear Mr. Pakush:

This letter is in response to a Nov. 14, 2013 letter from Kenneth Westlake, Chief of USEPA's NEPA Implementation Section, to Noel Mehlo Jr., Environmental Program Manager of the FHWA's Ohio Division, regarding the USEPA's EC-2 rating of the Opportunity Corridor Draft Environmental Impact Statement.

In particular, we would like to provide input to two specific recommendations outlined in the USEPA response. The first is "that ODOT coordinate further with GCRTA, the city of Cleveland, and HUD to consider TOD [Transit Oriented Development] opportunities that could be specifically linked to this proposed roadway." In the second, the USEPA recommends "the FEIS should identify which, if any, rail transit station or bus routes will be eliminated, re-located, or added along the project corridor."

To that end, All Aboard Ohio, a nonprofit association of rail and transit passengers, requests ODOT to consider analysis of the following in the Final Environmental Impact Statement:

- Relocate the East 79th Red Line station to near East 89th Street, in the vicinity of Buckeye Road and Woodland Avenue, as recommended in the Dual Hub Transitional Analysis adopted by GCRTA et al (see diagrams attached).
- Lengthen the East 105th-Quincy Red Line station platform to accommodate 3-car trains and add a station pedestrian entrance from the east side of a widened East 105th Street (see diagram attached).
- Partner with the City of Cleveland and the affected CDCs on TOD planning and zoning, including making available a basket of incentives to developers for providing a dense mix of land uses within a half-mile radius of both stations.

Guidance for addressing many of these issues exists in the Dual Hub Transitional Analysis of 1995, adopted by GCRTA, the City of Cleveland, Federal Transit Administration and NOACA as the Preferred Investment Strategy for this corridor, which included improvements to the existing Red Line rapid transit in today's Opportunity Corridor. Recommendations of the Transitional Analysis were since substantially implemented as the HealthLine BRT, but also includes one of four Red Line station relocated closer to ridership generators and station-area development opportunities. Ground was broken in October for the lone station relocation – the Little Italy-University Circle station, to be moved from Euclid-East 120th.

All Aboard Ohio asks ODOT, GCRTA, City of Cleveland and HUD to carefully consider relocating the East 79th Red Line station to the East 89th area – preferably a site between Buckeye Road and Woodland Avenue. We concur with the Dual Hub Transitional Analysis that the East 89th site offers much more opportunity for future growth in ridership compared to the current East 79th Red Line station. We see little or no hope for transit-supportive development in the vicinity of the East 79th station, which GCRTA staff has considered either rebuilding or possibly closing due to low ridership.

The lack of hope for transit-supportive development at the East 79th Red Line site is because former Van Dorn Iron Works parcels were recently acquired by Orlando Baking Co. on the west side of East 79th and a subsidiary of Kuhnle Brothers Trucking Inc. on the east side. We fully support continued rail transit service to the East 79th corridor at the Blue/Green Line station where future development is more likely.

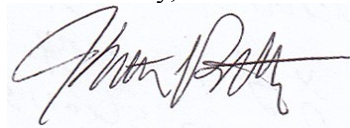
In contrast to the East 79th Red Line station area, there are more substantial residential areas to the north of a possible East 89th station site. Also, given the smaller parcel sizes, vacant lands and layout of streets in the vicinity of a potential station site between Buckeye and Woodland, we believe there are TOD opportunities in this area with the engagement of the affected community development corporations. The station can be an important gateway to the former Hungarian Hill neighborhood which offers some important assets, namely St. Elizabeth Church and the Kenneth L. Johnson Recreation Center.

Farther east, the East 105th-Quincy station was rebuilt a few years ago with a short, one-car platform and an access point on to Quincy. With plans for the Opportunity Corridor coming into focus, this station can be expanded to capitalize on a widened East 105th Street via a platform lengthened to accommodate 3-car trains (see attached diagram) and new pedestrian access from the improved East 105th Street.

To achieve this, a pedestrian access point could be provided on the east side of the East 105th Street bridge which is where the original station access point was prior to the rebuilding and relocation of the station to Quincy. We similarly envision that health-care related development, along with supportive activities such as housing, retail and offices for medical and educational facilities from neighboring University Circle, may spread southward along East 105th toward the Red Line station. We urge the station be designed to provide direct pedestrian/bicycle access to the East 105th corridor and the city's land use plan for this corridor support pedestrian/bicycle-friendly routes and environments.

All Aboard Ohio believes these suggestions are consistent with the framework of the recommendations made by the USEPA to ODOT and GCRTA. We believe they are also consistent with the Dual Hub Corridor Transitional Analysis land use planning being carried out by the City of Cleveland, GCRTA and CDCs at other rapid transit stations to support a growing interest in low-mileage lifestyles and improved access to jobs and neighborhood services. We therefore urge ODOT to consider their inclusion in its FEIS and funding plan for the Opportunity Corridor. Thank you for your consideration.

Sincerely,

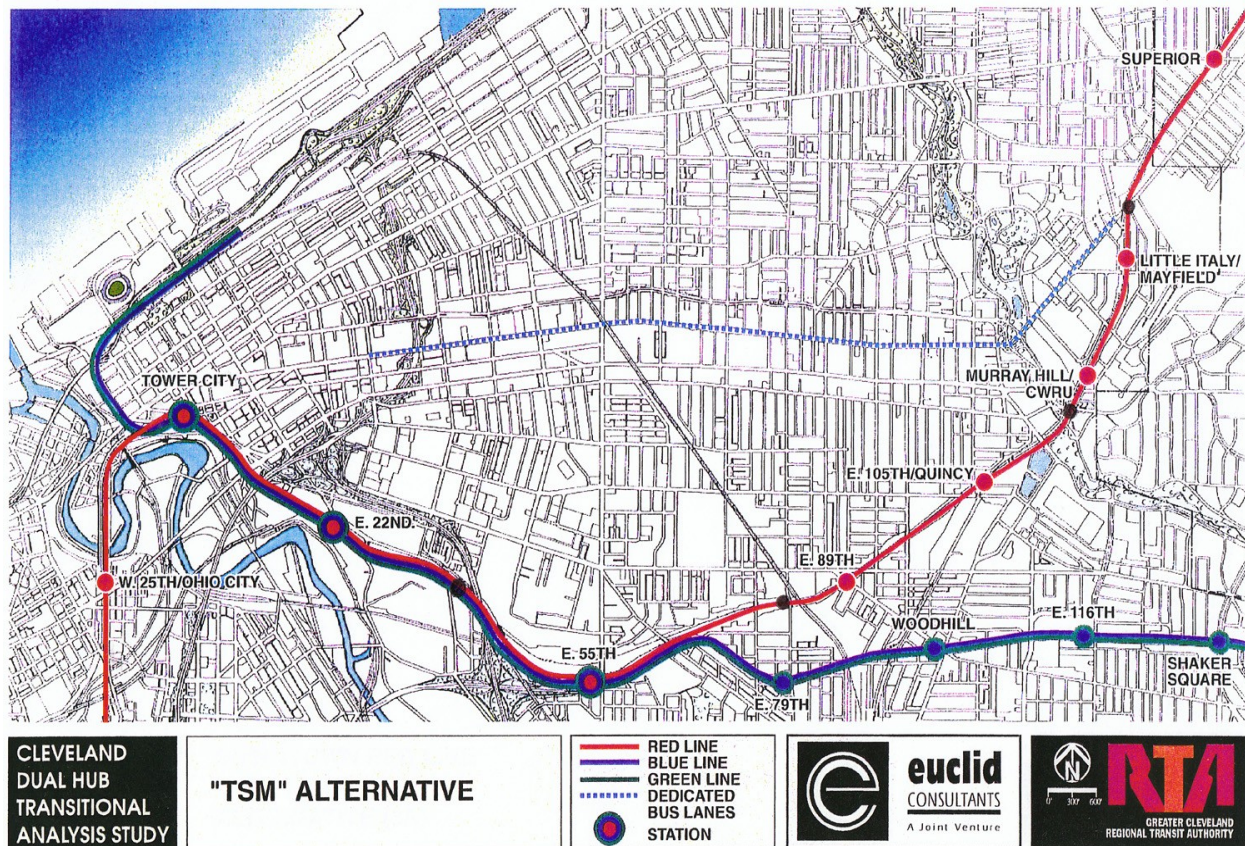
A handwritten signature in black ink, appearing to read 'Ken Prendergast', is written over a light blue rectangular background.

Ken Prendergast,
Executive Director

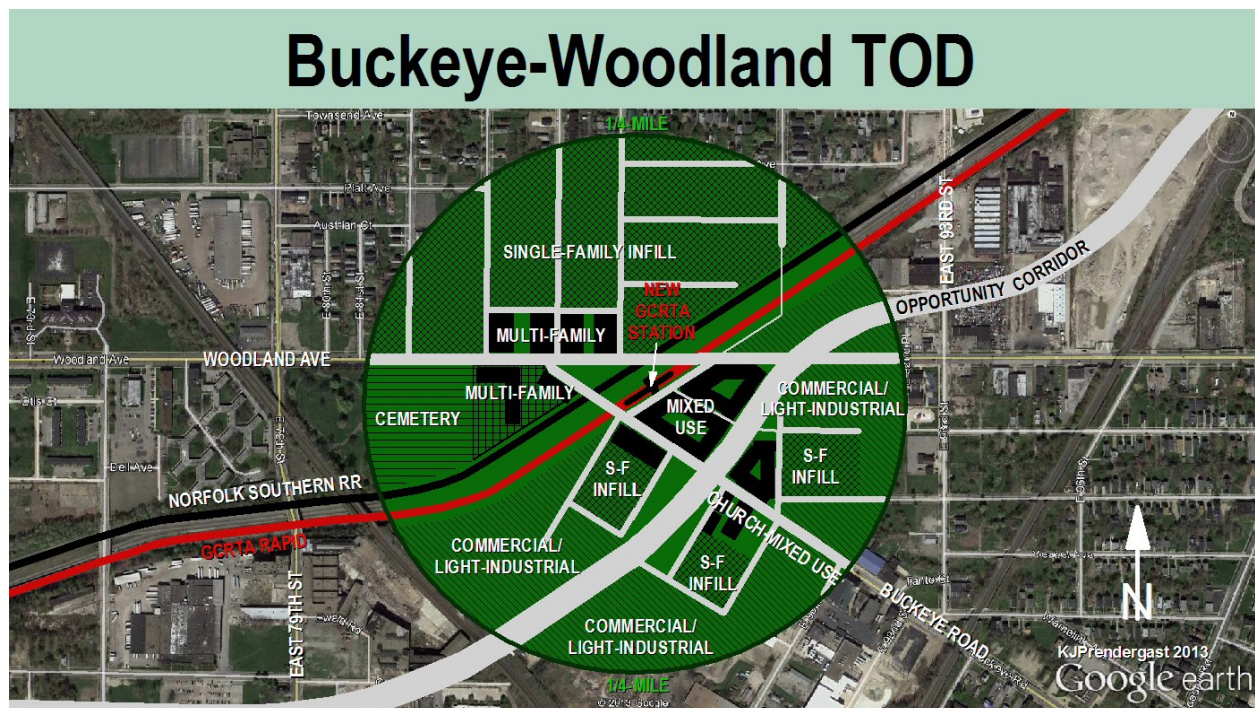
Enc.

Cc: Kenneth Westlake, USEPA
Noel Mehlo Jr., FHWA
Grace Gallucci, NOACA
Joe Calabrese, GCRTA
Robert Brown, CPC
Timothy Tramble, BBC
Vickie Eaton Johnson, FRDC

GCRTA, FTA, NOACA and Cleveland adopted preferred investment strategy for Dual Hub, 1995:



AAO's Transit-Oriented Development concept at relocated East 89th (Buckeye-Woodland) station:



All Aboard Ohio, 2013

AAO station concept: single-level Buckeye-Woodland station with enhanced visibility as platform is only 7-10 feet below surrounding land elevation (but 25 feet lower than existing bridge decks)...



AAO station concept: lengthen East 105th/Quincy station platform to accommodate 3-car trains and restore a station access point on East 105th to serve future development north of station...

