



TO: Mayor and Council

FROM: Howard S. Lazarus, City Administrator

CC: Tom Crawford, CFO
Derek Delacourt, Community Services Area Administrator
Jen Grimes, Senior Infrastructure Lead
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Missy Stults, Sustainability and Innovations Manager

SUBJECT: Council Agenda Responses

DATE: September 4, 2018

AC – 3 - Memorandum from City Administrator: Crosswalk Streetlight Implementation - August 30, 2018

Question: What is the definition of "sufficiently lit crosswalk?" Can you reference crosswalk illumination standards? (Councilmember Bannister)

Response: The City currently requires lighting for uncontrolled crosswalks to be designed in accordance with Federal Highway guidance for nighttime visibility. Street light assets meet the guidance set forth in the *IESNA American National Standard Practice for Roadway Lighting (RP-8-14)*. Street light placement is based on the guidance provided in FHWA's [Informational Report on Lighting Design for Midblock Crosswalks](#). The focus on new street light locations for uncontrolled crosswalks is to provide positive contrast lighting to illuminate the pedestrian for improved visibility to approaching motorists.

Question: Is this crosswalk illumination or does it include a streetlight in the area?
(Councilmember Bannister)

Response: This lighting is for streetlights at uncontrolled crosswalks only.

Question: Does the crosswalk lighting extend a few feet beyond the roadway to illuminate a pedestrian standing in the curb ramp? (Councilmember Bannister)

Response: The primary focus is to illuminate pedestrians while they are in the roadway and in the crosswalk. The ramp benefits from lighting as well but this isn't the primary focus.

Question: Is the lighting source located away from trees and other vegetation that may reduce crosswalk illumination, as it does at the mid-block crosswalk on Huron east of State? (Councilmember Bannister)

Response: Yes, it is the intent of to place the lights where they will have the most impact and away from obstructions.

CA-2 – Resolution Authorizing Sanitary Sewer Capital Recovery Charges for 3122 Geddes Ave. (\$25,954.00)

CA-3 – Resolution Authorizing Sanitary Sewer Capital Recovery Charges for 3151 Geddes Ave. (\$25,954.00)

CA-4 - Resolution Authorizing Sanitary Sewer Capital Recovery Charges for 3125 Geddes Ave. (\$25,954.00)

Question: How was the interest rate for the financing calculated? (Councilmember Warpehoski)

Response: Interest is calculated per City of Ann Arbor Code 1:571 (3) (b): "For sanitary sewer capital recovery charges or single lot assessments for sanitary sewer capital recovery charges, the rate of interest to be charge thereon shall not exceed 1% per annum above the interest rate for the most recent competitively sold and unsubsidized bond issued to finance similar water supply system improvements."

Question: Is 15 years the maximum duration for financing the recovery charges?
(Councilmember Warpehoski)

Response: Yes. The number of installments allowed by City Code is covered in 1:275 (2).

Question: Are other users eligible for this kind of extended capital recovery financing? For example, I heard from the owners of a brewery that opened in the Fifth Ward that they

were caught off guard with the capital recovery changes and the burden of paying them prior to opening the business was a serious cash flow challenge, but it was a cost they could have better accommodated had there been a way to pay off the charges post-opening as revenue came in. (Councilmember Warpehoski)

Response: Yes. City Code 1:275 (1) states that “It shall be the policy of the city to permit special assessments and single lot assessment for local public improvements, and single lot assessments for water capital recovery charges and sanitary capital recovery charges to be paid in installments.”

Question: What accommodations are available for low income or fixed income homeowners annexed into the City and needing to pay high recovery fees like this? (Councilmember Warpehoski)

Response: There are no special accommodations available for low or fixed income homeowners in City Code. They are eligible for the same plans as discussed above. However, since the charge will be included on future tax billing, the resident may be able to defer the tax payment as far out as April 30 of the following year it is charged, if eligible. Also, staff is investigating if Washtenaw County Community Development is able to provide assistance in some way.

CA-9 - Resolution to Ratify the Issuance of an Emergency Purchase Order to Sutphen Corporation for the Repair of Ann Arbor Fire Department Tower 1 by the City Administrator (\$79,392.35)

Question: The incident clearly shows the value of Fire response to accidents. Why, though, do we dispatch the tower truck to incidents like this rather than an engine or other vehicle that has a long capital cost, lower operational cost, and more redundancy within our fleet? (Councilmember Warpehoski)

Response: The fire department is working to adjust our responses to the freeway for the very reasons cited. Ideally, we would like to deploy a trailer-mounted attenuator (similar to what MDOT uses for their work crews) on our freeway responses. We have submitted a staffing proposal to the union that does not increase our fleet or FTE count and would allow for the response of this type of vehicle. Ideally, we would try this concept for 90-days by renting an attenuator.

Question: Regarding CA-9, I understand the City may have recourse and will explore its ability to recover some/all of the repair cost from the owners of the semi-truck or the two passenger vehicles that struck the apparatus – can you please provide an update on the cost recovery effort? (Councilmember Lumm)

Response: The City is awaiting information from the prosecutor’s office, as well as specific cost detail regarding the repairs. Once we have more complete information, we will file a claim with the insured’s carrier.

CA-13 - Resolution to Approve a Work Order with Microsoft Corporation to enter one year of Premier Support (\$50,000.00)

Question: Regarding CA-13, the cover memo references “Premier Support” which implies an elevated level of support over the basic/normal. If that’s accurate, is Premier Support what we have now and what does it give us over the standard support level? (Councilmember Lumm)

Response: We are renewing Premier Support as something that we have maintained for several years. Benefits of the Premier Support agreement included a dedicated Technical Account Manager available to escalate and oversee support incidents, proactive services designed to help us better leverage our Microsoft products and investments, and health check services to help us correct configurations to optimal best practices.

Premier Support allows us to interact with more senior level support technicians that can often improve resolution times when issues occur where working with support is warranted.

CA-15 - Resolution to Authorize a Municipal Street Lighting Purchase Agreement with DTE Energy and to Appropriate Funds for the Conversion of 378 - DTE Owned Mercury Vapor Street Lights to LED (\$65,354.00) (8 Votes Required)

Question: Q1. The cover memo uses the phrase “these remaining streetlights” which suggests these 378 being converted are the only mercury vapor lights left in the City. Is that correct? If not, how many are left and do we have a sense when full conversion will be completed? (Councilmember Lumm)

Response: These are all of the remaining mercury vapor lights (note: we still have high pressure sodium DTE fixtures)

Question: Q2. This conversion was not in the FY19 budget so why is it now being proposed? (Councilmember Lumm)

Response: This was mostly due to DTE’s schedule. After the FY19 budget process, they informed the City that they had additional capacity to move forward with converting the conventional streetlight fixtures to LEDs so we began working with them to find which conversion would make the most financial sense. We didn’t anticipate them having the time in their schedule to make these changes this fiscal year, hence why they weren’t originally budgeted.

Question: Q3. The City has a dedicated fund for “energy projects”. Why wouldn’t that fund be the source of funding for this conversion? (Councilmember Lumm)

Response: The energy fund is managed by the Office of Sustainability & Innovations (fund 0002), which is used to make loans to other departments for energy efficiency improvements. Once the loan is made, the department makes annual payments back to the energy fund with the savings accrued through the project. In the case of these streetlight conversions, the general fund was preferred as it allows us to make a lump sum payment as opposed to an annual payment, which would increase annual operating costs.

CA-18 - Resolution to Approve a Lease Agreement between the City and Solo Aviation Inc. for Office Space Located at the Ann Arbor Municipal Airport

Question: Shouldn’t this be an 8-vote item under section 14.3 of the City Charter? (Councilmember Warpehoski)

Response: Thank you for catching this. The file has been updated to reflect an 8-Vote requirement.

CA-19 - Resolution to Approve a Grant Contract with the Michigan Department of Transportation for Work Related to the Environmental Assessment Study for the Safety Extension of Runway 6/24 at the Ann Arbor Municipal Airport (\$279,100.00)

CA-20 - Resolution to Approve a Professional Services Agreement between the City and Mead & Hunt Inc. for Work Related to the Environmental Assessment Study for the Safety Extension of Runway 6/24 at the Ann Arbor Municipal Airport (\$275,592.01)

CA-21 - Resolution to Approve a Reimbursement Agreement with the Federal Aviation Administration for Work Related to the Environmental Assessment Study for the Safety Extension of Runway 6/24 at the Ann Arbor Municipal Airport (\$27,914.50)

Question: Q1. I recognize that as noted in the cover memo to CA-19, “The requested action in no way approves any construction or bidding to make any changes to the runway.” Can you also please confirm that if the FAA issues a Finding of No Significant Impact once the EA is completed, but the City does not choose to proceed, that the City is not liable to reimburse any or all of the federal grant funds? (Councilmember Lumm)

Response: The grant funds under consideration by Council this evening, and those previously approved by Council, are specific to the environmental assessment of the proposed safety extension of runway 06/24. Completion of that assessment process will ensure that the City has no liability for repayment of federal grant funds. Upon completion of the environmental assessment, if the City decides not to move forward on

the proposed runway extension project, there is no liability for repayment of federal grant funds.

Question: Can you provide a chronology of the efforts taken in pursuit of the runway extension? (Councilmember Eaton)

Response: A memorandum was provided to City Council from the City Administrator's Office on August 29, 2018 that provided a history of the environmental assessment efforts for the proposed project. This memorandum is also included on tonight's agenda as Item AC-2.

Question: How much has been spent, in local, state, and federal funds, on the environmental assessment at the airport, prior to this grant? (Councilmember Eaton)

Response: Local funding in the amount of \$9,913.00 has come from the City's Airport Fund. The state has contributed \$56,262.00 in funding from the Michigan Department of Transportation, Office of Aeronautics. The federal contribution in the amount of \$330,325.00 has come from the FAA's Airport Improvement program. All funding has come from fees paid by users of aviation industry services

Question: Please provide a copy of the 2017 FAA comments "that required an updated noise study, wildlife hazard assessment, and wetlands assessment." (Councilmember Eaton)

Response: A copy of the February 2017 comments from the FAA and the detailed comment matrix are attached. This document resulted in a series of conference calls between the FAA, City and State of Michigan to determine which comments were warranted and what expectations the FAA had for the revisions to the environmental assessment document.

Question: Could this \$279,100 Grant Contract be used to assess the environmental impact of the existing airport, instead of the runway extension? (Councilmember Bannister)

Response: The proposed grant contract, approved by the Michigan Aeronautics Commission, is specifically designated for the evaluation of potential environmental impacts for the proposed safety extension of runway 06/24. It cannot be used for other purposes.

Question: MDOT-Aero maintains a list of consulting firms in Michigan that are qualified to complete this type of work. Did the City offer this contract for competitive bid to companies on the MDOT list of firms? If not, why not? (Councilmember Eaton)

Response: The City did not competitively bid this contract from the list of MDOT-Aero firms. MDOT-Aero usually rotates airport environmental assessment work between the qualified firms on their list after getting feedback from the airport on their needs and preferences. In this case, the airport, MDOT-Aero and the FAA discussed the firms

best qualified to complete the revisions from MDOT-Aero's list and determined that Mead & Hunt was the most qualified. Since the environmental assessment work is not starting fresh from the beginning but revising and updating an existing document, the parties agreed a firm with robust resources like Mead & Hunt would be beneficial. In addition, Mead & Hunt was one of the few firms that had experience with the new noise model required by the FAA. This apparently is the first use of this noise model by a Michigan airport.

Question: Q2. On CA-21, the cover memo suggests indicates the City "can" be reimbursed 95% of the actual costs by MDOT. Is that reimbursement at the discretion of MDOT or just a matter of applying for it? (Councilmember Lumm)

Response: The airport receives non-primary entitlement funds through the Airport Improvement Program each year for eligible projects. The reimbursement to the City for 95% of the actual costs of an FAA Reimbursement Agreement is an eligible project under that program. The reimbursement to the City, which would be through a grant contract which must be approved by the Michigan Aeronautics Commission, is more a matter of just applying for it.

Question: Q3. Assuming all the resolutions are adopted by Council, what is the projected timeline for completion of the updated EA including the 3rd public hearing and public comment period? Is this (like the train station) a 30-day public comment period? (Councilmember Lumm)

Response: The Consulting Engineer anticipates an approximately nine month period from the notice to proceed to complete the draft environmental assessment and have it available for public and agency comments, including the public hearing. Two important components to meeting that schedule are approval by City Council at tonight's meeting and reasonable response time from the FAA. Delay in approving the contract may cause the Engineer to miss the window of opportunity to complete the wetlands assessment this fall, which would push back the overall schedule. The FAA has requested to review the Engineer's findings as they complete various sections of the document. Significant delays in their response may impact the schedule as well. The public comment period is a 30-day period like the train station.

B-1 – An Ordinance to Amend Section 5.17.3G of Chapter 55 (Unified Development Code) of Title V of the Code of the City of Ann Arbor (Medical Marijuana Provisioning Center Location Restriction) (Ordinance No. ORD-18-21)

Question: Regarding B-1, the agenda does not show a public hearing on this item. Second reading was postponed at the August 23rd meeting and I thought that public hearings were continued when second readings of ordinances are postponed – am I missing something? (Councilmember Lumm)

Response: The public hearing was held and closed at the August 23 Council meeting.

Question: If approved, would this 1000 feet restriction be more than the restrictions the City places on a drugstore/pharmacy and a liquor store/bar and other places that sell tobacco? (Councilmember Bannister)

Response: Yes.

Question: Has any estimate been made of the new annual tax revenue that the City might receive from dispensaries that could be used to support schools, roads and local government? (Councilmember Bannister)

Response: No.

B-2 – An Ordinance to Amend the Zoning Map, Being a Part of Section 5:10.2 of Chapter 55 of Title V of the Code of the City of Ann Arbor, Zoning of 6.4 Acres from C1A/R (Campus Business Residential District) WITH CONDITIONS to C1A/R WITH CONDITIONS (AS AMENDED), 1140 Broadway Rezoning, (CPC Recommendation: Approval - 9 Yeas and 0 Nays) (Ordinance No. ORD-18-24)

Question: Please show us how the reciprocal easement effectively enforced the .9 parking spaces per unit lot split across three parcels. It appears the condo parcel physically contains more parking and there is no enforcement to assure the lot split remains in compliance with the parking requirement as required. (Councilmember Bannister)

Response: The easement would ensure that each parcel would continue to have access to the required parking. The easement will ensure for example that parcel B can maintain access to parking provided on parcel A. City Code provides for such arrangements.

Question: FEMA suggested the city have language to protect itself for future maintenance costs. Where is that addressed? (Councilmember Bannister)

Response: This is addressed through the authority to enforce CLOMR-F requirements through the Michigan Building Code and through the requirement included on the site plan.

Question: The development documents still call this a mixed use urban village and will enshrine that language legally. That creates a precedent with three parcels at 0%, 0%, and 3% commercial being called mixed use. This language should be removed. (Councilmember Bannister)

Response: The development still includes mixed uses, as it is site planned as a single development. It is not necessary to remove this language.

Question: Roundabout: May we have a copy of the third party consultant's evaluation report? Were pedestrians and cyclists addressed in this report? (Councilmember Bannister)

Response: The result of the analyses for the roundabout are attached to this email. The file "Revised TIS Review Comments 6-21-17 Response.pdf" provides a response to the various design scenarios proposed (page 3, item G).

G. Broadway Street and Proposed Site Driveway-Intersection Alternatives

13. *The all-way stop, three-way stop, roundabout and signalize options shows vehicles waiting to make the left turn from westbound Broadway Street to southbound Plymouth Road backing up through the intersection/roundabout.*

The SimTraffic analysis outputs, which show the average of five simulation runs conducted for each analysis scenario, display a 95th percentile queue length on this approach of 103 feet and 180 feet (4-8 vehicles) during the AM and PM peak hours, respectively. It is possible that occasional short periods of vehicle queues could extend through the intersection on an isolated single signal cycle basis, the capacity at the signalized intersection of Plymouth Road and Broadway Street will also be efficiently utilized by the constant adjustments of the SCOOT adaptive signal system. Overall, any of the three options (traffic signal control excluded) for traffic control at this intersection will operate acceptably, with the roundabout providing the best option.

Additional comments were made by the transportation engineers in Traffic Reviews #5 and #6 – which include consideration for the bicycle and pedestrian accommodations as part of the project (note: not all comments are not directly related to the roundabout but rather access to the site in general).

Question: Regarding B-2, can you please explain why staff believes the proposed new condition that only this site plan can be constructed is in the City's best interests and should be accepted? If it is not accepted, but the revised condition on height limits is accepted, what would be the major parameters in terms of height, mass, FAR, parking, setbacks etc for future site plans on this C1A/R (with conditions) zoned site(s)? (Councilmember Lumm)

Response: Staff believes that the proposed new condition is desirable as codifies the expected development plan which was approved by City Council. This ensures for example that residential uses be included, where they would not be required by the C1A/R Conditional Zoning alone. Based on the voluntary nature of conditional zoning, it is not appropriate for City Council to unilaterally select among offered conditions in a piecemeal form. The proposed petition should be considered in its entirety. Without this amendment, all of the standard requirements of the C1A/R would apply.

C-1 – An Ordinance to Amend Section 9:106. - Periodic Fire Safety Inspections Required, of Chapter 111 of Title IX of the Ann Arbor City Code

Question: Regarding C-1, the cover memo indicates the ordinance changes are to “reflect current inspection practices” which sounds like more clean-up and alignment than substantive change. Is that an accurate assessment or are there any changes in inspection frequency for any building types and if so, how will those owners be notified of the change? (Councilmember Lumm)

Response: Correct, this is more of a clean-up and alignment with actual practices than a substantive change. This matter was actually brought forth during meetings with business owners to discuss the revised inspection rates, which went into effect July 1, 2018.

Question: Also on C-1, do we have any benchmark data with regard to frequency of inspections in other similar sized cities and/or University communities? (Councilmember Lumm)

Response: No, we do not have benchmark data with other university communities.

DC-1 - Resolution Confirming Next Steps in Community Participation and Engagement in Developing the City Budget and Spending Priorities

Question: What other costs (including internal staff time costs) are necessary “to adopt the Priority Based Budgeting (PBB) approach”? (Councilmember Warpehoski)

Response: The recommended direction for the PBB initiative is to just utilize the survey portion of the process at this time. Staff estimates the survey, as expanded by direction in Council’s resolution, will require approximately 1 week of staff time between now & Dec. 1st. This estimate is comprised of:

- Survey Design (3 full days – includes 2 meetings with the vendor, data preparation, and a meeting with available Council members.
- Survey Roll-out (1/2 day) – due to the limited time before the Dec. 1st deadline, as well as existing staff resources presently being focused on the FY2020/2021 budget preparation, most of the survey outreach efforts will need to be electronic in nature.
- Data Collection and Analysis – negligible staff time is needed during this phase since PBB would be performing most of the work.
- Development of Final Report (1.5 days) – this includes reviewing the final report, discussing alignment with city resources, and preparing a presentation for Council.

Question: How would this affect the next 2-year budget planning cycle? (Councilmember Warpehoski)

Response: The results of the survey should be available for Council's December Retreat. Depending on how it is received, a budget request for additional funding (approx. \$60k one time and \$30k recurring) could be considered during the development of the FY2020/2021 financial plan. If approved, that would provide resources to perform the other phases of the PBB methodology in the summer/fall of 2019.

Question: Is there adequate time to retool our budget process? (Councilmember Warpehoski)

Response: Only the survey portion of the process is recommended at this time. The rest of the PBB process would not be available during the FY2020 budget development. If additional funding is approved in the FY2020 budget, additional PBB information would be available during the FY2021 budget development.

DC-2 – Resolution to Direct that the City Administrator and City Planning Commission Evaluate Rezoning of Certain Properties Along South Ashley Street and Properties in the Area of Davis Avenue, Hoover Avenue, Edgewood Place, Wilder Place, and Main Street

Question: Regarding DC-2, the first whereas clause indicates that “City Council has received requests from property owners to evaluate rezoning.” While I recognize the benefits of rezoning these properties consistent with the Master Plan recommendations of single and two-family use, I’m wondering what the process and rules are with regard to rezoning areas/multiple properties. Do all property owners need to formally request the rezoning? What if some object? Can the city initiate re-zoning (if so, under what circumstances) or does rezoning have to be owner-initiated? Can you please provide some clarification on the process/rules? (Councilmember Lumm)

Response: Rezoning can be initiated by City Council, the Planning Commission, or property owners. This applies to individual or areas comprising multiple properties. The City Council can rezone property with or without the concurrence of property owners, so long as the prescribed procedures are followed.

DB-4 - Resolution to Approve Second Amendment to Articles of Incorporation of the Economic Development Corporation of the City of Ann Arbor

Question: Regarding DB-4, is there some specific activity being contemplated by the EDC/A2 that is prompting this request and if so, can you please elaborate a bit on what that is? (Councilmember Lumm)

Response: There is no specific activity prompting this request.

**Federal Aviation Administration
Great Lakes Region
Detailed Comments on the Draft Environmental Assessment
For
Ann Arbor Municipal Airport
February 2017**

1. The EA needs to be written in compliance with new FAA Order 1050.1F, especially Chapter 3, Affected Environment and Environmental Consequences. Since this section is essentially the heart of the EA and provides the analysis upon which the FONSI would be based, it is imperative that this section is written in accordance with FAA's latest NEPA implementing regulation, Order 1050.1F. Significant changes between old Order 1050.1E and new Order 1050.1F pertain to impact categories and in order for this EA to properly evaluate anticipated impacts resulting from implementation of the proposed action, the new order must be followed. The sponsor's rationale for not following Order 1050.1F is that the EA has been in process since 2009 and that "no change in content" would result from following the new Order; this is inaccurate for the following reasons. As the sponsor stated in their January 2017 Notice of Public Information Meeting for the draft EA that "the original 2010 EA has been revised and updated" such a claim cannot be made if the document does not adhere to Order 1050.1F. Furthermore, if the EA was revised in accordance with Order 1050.1F there certainly would be changes in content, as impact categories have changed. As this EA will be issued as a substantially new draft to the public, it must adhere to the requirements of new Order 1050.1F. Further, provide documentation that the surrounding and or existing conditions have not changed and update all correspondence with Agencies to verify that there are still no impacts that might rise to a level of significance.
2. A new wetlands survey and coordination with the proper authorities must be completed. The last field survey was conducted in 2009; a new survey would provide updated affected environment information to determine the extent of anticipated impacts. This in turn would provide the basis for permit applicability and extent and type of mitigation requirements. The sponsor's insistence to "complete a real-time field review of project areas to confirm the presence of wetlands, or lack thereof, during project design" (i.e. post-NEPA) goes against the spirit, logic, and requirements of NEPA and CEQ implementing regulations.
3. The document does not contain a proper discussion of the State Block Grant Program (SBGP). Such a discussion is important for the reader to distinguish between the listed Federal, state, and local proposed actions. It is important for the reader to be able to understand sources of funding, sponsor role, and extent of FAA involvement and how it differs from non SBGP projects.
4. Purpose and Need Statement. The statement is not concise and is incomplete in establishing a purpose and need. This chapter does not provide clear justification for all of the issues that were included in the chapter. Additionally other considerations are presented but are not fully incorporated into the P/N chapter (and/or other chapters of the EA). Having a well-defined purpose and need

statement along with adequate justification is critical in establishing the objectives that are used in identifying and developing the feasible alternatives.

5. The discussion indicating FAA will provide environmental approval to allow SBGP funds to be eligible for projects is inaccurate. This statement is direct opposition to the FAA's Advisory Circular (AC) 150/5100-21 State Block Grant Program. The AC for SBGP clearly indicates that the SBGP state will provide the environmental approval to allow for SBGP funds to be for eligible projects. Only SBGP funds are being used therefore the State has the responsibility to provide environmental approval. There is no Federal approval required for this proposed action in terms of funding.

6. Use of B-II Small Aircraft for Design. It's not clear to the reader how the B-II Small vs. B-II Large distinction is derived. The documents analysis of user surveys results in a determination that the B-II Small is the critical aircraft, however it's not clear how this determination is made as the user surveys also indicate that there are almost an equal number of B-II Large aircraft operations, compared to B-II Small aircraft (on average 52% Small vs 48% Large). B-II Large ops are not sufficiently taken into account or discussed, nor are the smaller sized A-I/B-I operations. The impact to B-II Small users is also not clear. Additional information and analysis of B-II Large and A-I/B-I operations would provide certainty that the B-II Small is the appropriate aircraft for use in design since both B-II Small and B-II Large operations are individually less than the 500 threshold for regular use. Incomplete information may lead readers to infer that B-II large critical aircraft are using the airport regularly, yet it doesn't appear to have been included in this environmental review (e.g. noise).

7. Noise analysis. A reevaluation was conducted in 2014 on the 2009 noise modeling results. The document arrives at the conclusion that the 2009 contours are still valid. This reevaluation is based on the existence of the same fleet mix and decrease in operations. The EA will need to provide clear documentation the fleet mix currently using the airport is representative of 2009 analysis. This is required to demonstrate the noise contours are accurate. The EA does not have a noise contour map for year 2022/23 (5 years after implementation). Recommend strong consideration be given to run the AEDT model to establish the noise contours.

8. Safety – Line of Sight - The document briefly discusses a line of sight issue at Taxiway A1 (not visible from the ATCT), also identified as Hotspot 1, as a benefit of the project (Purpose and Need Chapter). The document needs to go further in discussing the issue and/or how the proposed action will improve or resolves the issue.

9. The DEA indicates a goal is to allow the "majority of critical aircraft to safely operate at their optimum capabilities without weight restrictions," and references Paragraph 103 of FAA Advisory Circular 150/5325-4B, Runway Length Requirements for Airport Design. This paragraph states, "The design objective for the main primary runway is to provide a runway length for all airplanes that will regularly use it without causing operational weight restrictions." That same document would only justify a runway length of 4,200. The EA does not provide sufficient justification to illustrate the need for the length identified. What are the current "optimum capabilities and weight restrictions" impacts

experienced by the aircraft regularly using the runway? Provide examples of local factors that explain the current and expected usage of the airport. These factors should support the assumption that forecasted growth will return to the airport rather than the historic trend over the past 15 years.

10. Forecast. The document uses the FAA Terminal Area Forecast (TAF) and MDOT State Aviation System Plan Forecast to justify consistency and growth in the number of B-II Small operations; however, the DEA does not discuss how the forecasts are developed nor the assumptions made to substantiate growth. It's important for the reader to fully understand how the forecast is developed. Providing discussion on how the forecasts were developed prevents the potential misunderstanding or misuse of the forecast by illustrating how they're applicable to current local conditions.

11. Decrease in Operations at ARB. The general trend over the past 15 years has been a decrease in B-II operations at ARB (there have been some years where ops are constant). However the document does not provide an evaluation to account for the significant decrease in operations in the early 2000's and 2007-2009. The absence of explanation puts into doubt the validity of the forecasted growth as the TAF is based primarily on time series analysis and historic trends. Providing explanation of potential reasons for one-off decreases provides contrast to the historic data's decrease over time.

Ann Arbor Municipal Airport (ARB), Ann Arbor Michigan - Draft Environmental Assessment FAA Combined Comment Matrix
--February 2017--

Comment Number	Section Number	Paragraph	FAA Comment	MDOT Comment Resolution (Oct 2016)	FAA Response (Feb 2017)
3	1.3 & 1.4	all	The intro and background sections are discussing the State Standards. What are the Federal Requirements, in addition to the State reqs? Critical Aircraft (1.5.1) & use of runway. Aircraft Activity (1.5.2) and Characteristics/Recommendations (1.5.3) all need to be in the background section before purpose and need section. Info in P & N needs to be in the background section	On April 21 2015 the FAA-Region provided a 2011 Environmental Assessment from Bolingbrook's Clow International Airport, as an example for MDOT-AERO to follow while re-organizing and revising this draft. AERO put significant effort into modeling this draft after the Bolingbrook example and believes the content is consistent. The draft EA was revised to try and clarify the issue raised here, yet remain consistent with the example previously provided.	The FAA provided the Bolingbrook Clow International Airport EA as a representative example of a document for the State to use as a guide to preparing the Draft EA for Ann Arbor. The FAA is prepared to discuss its applicability to this document with the State in the upcoming meetings.
4	1.3	6	Need a discussion of the SBGFP so that the reader is better able to understand the division of proposed actions between state and Federal	Revised draft EA	The document does not contain a proper discussion of the State Block Grant Program (SBGFP). Such a discussion is important for the reader to distinguish between the listed Federal, state, and local proposed actions. It is important for the reader to be able to understand sources of funding, sponsor role, and extent of FAA involvement and how it differs from non SBGFP projects.
11	1.4	all	The purpose and needs statement should be complete and concise This would include stating the problem that is looking to be addressed. A statement of overall safe and efficient and usable is a general statement and should be lightened up to reflect the discussion that follows. It is confusing on why the line of sight issue is singled out in the statement. Consider revising this statement.	On April 21 2015 the FAA-Region provided a 2011 Environmental Assessment from Bolingbrook's Clow International Airport, as an example for MDOT-AERO to follow while re-organizing and revising this draft. AERO put significant effort into modeling this draft after the Bolingbrook example and believes the content is consistent. The draft EA was revised to try and clarify the issue raised here, yet remain consistent with the example previously provided.	Purpose and Need Statement. The statement is not concise and is incomplete in establishing a purpose and need. This chapter does not provide clear justification for all of the issues that were included in the chapter. Additionally other considerations are presented but are not fully incorporated into the PIN chapter (and/or other chapters of the EA). Having a well-defined purpose and need statement along with adequate justification is critical in
14			This paragraph is general in nature. A runway of 4,300 feet would allow without load restrictions... why 4,300's, why not 4,500, 5,000, or 10,000. The paragraph should instead define the runway length needs of the aircraft regularly using the runway, including haul lengths and loads rather than suddenly put out that 4,300 ft. would satisfy it.	As explained in Section 1.5.3, The FAA recommended runway length of 4,200 feet at ARB was obtained by calculation following the methodology referenced in Chapter 2 of FAA Advisory Circular "50150325-4B", "Runway Length Requirements for Airport Design," a publication that is used nationally by the agency. The methodology and figures referenced in this section of the AC result in recommended runway lengths that are airport-specific, and they can vary by hundreds of feet from site to site, depending on the specific airport elevations and mean daily maximum temperatures used in the calculations. For example, if a representative higher-elevation airport in the Denver area had an elevation of 5,000 feet MSL, interpolation of Figure 2-2 of Chapter 2 of the AC shows that a runway length of approximately 5,000 feet in length would be recommended for the same B-II Small category of critical aircraft in Michigan, airport elevations at our public-use airports only range from 578 feet to 1,622 feet MSL. The AERO runway length recommendation of 4,300 feet is a statewide standard for all airports in the state with category B-II critical aircraft classifications, as identified in Table 40 of the Michigan Airport System Plan (MASP). Since airport elevations and mean maximum temperatures do not vary significantly from airport to airport in Michigan, as opposed to many other states, AERO uses a single runway length recommendation for all airports of the same critical aircraft classification. The reason that the preferred alternative in the draft EA references a runway length of 4,300 feet is that this length meets both FAA and AERO runway length recommendations for critical aircraft in the B-II Small category	The response still does not appear to identify how the 4,300 ft was determined or why a longer runway is not necessary (given the operations by B-II large aircraft). This is the first time 4,300 ft. is discussed in the document. The documents analysis of user surveys results in a determination that the B-II Small is the critical aircraft, however it's not clear how this determination is made as the user surveys also indicate that there are almost an equal number of B-II Large aircraft operations, compared to B-II Small aircraft (on average 52% Small vs 48% Large). B-II Large ops are not sufficiently taken into account or discussed, nor are the smaller sized A-IPB operations. The impact to B-II Small users is also not clear. Additional information and analysis of B-II Large and A-IPB operations would provide certainty that the B-II Small is the appropriate aircraft for use in design since both B-II Small and B-II Large operations are individually less than the 500 threshold for regular use. Lack of additional information may lead readers to infer that a future B-II large critical aircraft is coming, yet has not been environmentally reviewed (e.g. noise)
15	1.5.1	5	The example seems to be an extreme case, how often does this user use the airport and what type of B-II aircraft is it? Why do they base at ARB instead of another close airport if they cannot use the aircraft to it's max capability above 40 degree F?	This user flies approximately 200 operations from ARB annually in Cessna 560 Excel jet. The user's business is based in Ann Arbor and the proximity to the airport provides convenience and a significant time savings over other local airports	Recommend identifying in this section that an analysis was completed to determine that a 4,300 ft. runway was identified as the preferred length. Add reference that more detailed discussion is in section 1.5.3.
16	1.5.1	8	"Part 135 operators must reduce the useable length of the runway by anywhere from 20-35% based on runway conditions" has this quote been verified through citation to the actual Part 135?	The corporate pilot quotation regarding Part 135 operators has been verified to 14 CFR 135.385 paragraphs (b) and (f)	The Cessna Citation 560XL Maximum Takeoff Weight (MTOW) is 16,800 lbs. Above the 12,500 lbs threshold used for runway length calculation. Though it is true that this is also a B-II aircraft like the King Air 200, the Citation user is going to have a vastly different runway experience than the King Air pilot. If the quote is going to be included, then it should clearly identify the type of aircraft as larger than the critical aircraft and the benefits of the 4,300 ft runway to their ops, even though they may need a longer runway.
	1.5.1	1			Include a footnote indicating the citation location

19	1.5.3	FAA	<p>Clarify why 4,200' (AC 150/5325-4B) would not support the Purpose and Need (P&N) as opposed to the requested 4,300'.</p> <p>Clarify whether the category B-II Small Aircraft requires a runway length of up to 4,300, or do the larger B-II airplanes require this length? The Small B-II may be on the lower end of the spectrum?</p>	<p>As explained in section 1.5.3 of the draft EA, utilization of current FAA runway design standards results in a recommended runway length of 4,200 feet at ARB. Utilization of current AERO runway design standards results in a recommended runway length of 4,300 feet. Although the recommendations are very similar, the reason that 4,300 feet was referenced in the draft EA in meeting the purpose and need is that it meets both the FAA and AERO current standards for runway length recommendations based on the critical aircraft category of aircraft. Revised draft EA</p>	<p>Clarify what the FAA standards are and justify versus what justification is for the 4,300 foot runway. The FAA guidelines appear to only support a 4,200 foot runway.</p>
22	1.5.3	4	<p>Clarify why User-Survey Reports were heavily relied upon? Why not TAF and Tower Counts? TAF was very close to accurate, however it is not logical to conclude (quantitative to qualitative) that ops will increase, because TAF may not always support constant increase. (Justify, e.g. is there a new coach that may boost attendance for Michigan games which will increase probability of increased attendance/travel?)</p>	<p>The reason that User Survey Reports were relied upon in this study is that they distinguish between the various aircraft makes and models, while the TAF and Tower Counts do not. From the various make and model information, aircraft approach categories, design groups, weight classifications (large vs. small), and critical aircraft categories can be determined. The TAF shows total numbers of forecasted operations, but the distinction of aircraft makes or models. The Tower Counts show historical numbers of total operations, but no distinction of aircraft makes or models. All three data sources (user surveys, TAF reports, and Tower Count reports) are useful for different aspects of analysis and forecasting, and all of these sources were used appropriately in this study. As stated in paragraph 1.5.4, the current TAF (which is prepared by FAA personnel and updated annually) forecasts continually increasing operations at ARB from year 2014 through year 2040, and the current MASP (which is prepared by MDOT personnel and updated periodically) also forecasts similar numbers of continually increasing operations through year 2030.</p>	<p>It's not clear how the B-II Small vs. B-II Large distinction is derived. The documents analysis of user surveys results in a determination that the B-II Small is the critical aircraft, however it's not clear how this determination is made as the user surveys also indicate that there are almost an equal number of B-II Large aircraft operations, compared to B-II Small aircraft (on average 52% Small vs 48% Large). B-II Large ops are not sufficiently taken into account or discussed, nor are the smaller sized A-IB-I operations. The impact to B-II Small users is also not clear. Additional information and analysis of B-II Large and A-IB-I operations would provide certainty that the B-II Small is the appropriate aircraft for use in design since both B-II Small and B-II Large operations are individually less than the 500 threshold for regular use. Incomplete information may lead readers to infer that B-II large critical aircraft are using the airport regularly, yet have unexplainably not been included in this environmental review (e.g. noise).</p>
23	1.5.4	8 (last) several			<p>Top of page 13 discussion on User Surveys and bottom of page 17; there is still no actual justification for the extension other than that it is for B-II category aircraft.</p>

<p>24</p>	<p>1.5.4</p>	<p>The paragraph indicates that the TAF is used to project forecasted operations to 2040. Does the airport have a locally developed forecast to compare this to? Does the airport understand how the TAF was developed and if it's really a good indicator of B-II linerant ops?</p>	<p>While the airport does not have a locally developed forecast, the current FAA-developed TAF as well as the current MDOT-developed MASP both show continually increasing operations at ARB from present date at least through the year 2030. It is logical to conclude that all categories of aircraft that use the airport would show some increase in their annual operational numbers as part of the overall increase in activity. But even if Category B-II operations remained at the level of the 538 annual operations that were documented in year 2014, and the entire increase in operations was attributed solely to increased activity by the smaller categories of aircraft (highly unlikely - especially if the runway is extended to 4,300 feet in length as proposed), the justification for the proposed project would still be substantiated both presently and through future years.</p>	<p>There appears to be a disconnect as to how the TAF applies to local conditions at the airport in the DEA. The document uses the FAA Terminal Area Forecast (TAF) and MDOT State Aviation System Plan Forecast to justify consistency and growth in the number of B-II Small operations; however, the DEA does not discuss how the forecasts are developed nor the assumptions made to substantiate growth. It's important for the reader to fully understand how the forecast is developed. Providing discussion on how the forecasts were developed prevents the potential misunderstanding or misuse of the forecast by illustrating how they're applicable to current local conditions.</p>
<p>25</p>	<p>1.5.4</p>	<p>It is logical to conclude that operations by B-II category aircraft and larger will also increase beyond the 551 that were documented in 2014. Table 1-1 indicates that the 5-year trend from 2010 to 2014 is a steady or downward trend in B-II ops. Why is it logical to believe B-II ops will increase given the history of ops at the airport? - does the 551 include just B-II aircraft or B-II and larger as indicated in the paragraph? - How many of the 551 ops by B-II aircraft are by the representative King Air 200 or aircraft with 10 or more passenger seats?</p>	<p>Changes made and clarification added to Section 1.5.4 as requested. A table has also been added to User Survey Report No. 4 (Exhibit 1 of Appendix A-4 of the draft EA) which clarifies the number of annual operations conducted in 2014 by specific aircraft models and groupings (B-II, B-III, and C-III). As a result of preparing the table and analyzing and categorizing the operations of specific aircraft models, the operations performed exclusively by category B-II aircraft have been revised to 538 instead of the 551 that were mentioned in the previous draft of the EA. Total of 544 annual operations were performed by the combined B-II and Larger categories of aircraft. The text in Section 1.5.4 as well as numbers shown in Table 1-1 have been revised accordingly. In answer to FAA's question regarding a "steady or downward trend in B-II ops" from year 2010 to 2014: Table 1-1 of the draft EA does show minor fluctuations in the levels of estimated annual B-II operations during this time frame, from a low of 537 to a high of 600. These numbers were based on the minor fluctuations in total operations that occurred during the same time frame. The trend is not a steady downward trend as FAA suggests, but rather the numbers fluctuate both downwards and upwards. The numbers are also relatively close to each other, as opposed to being drastically different. The severe and multi-year economic recession that originated in 2009 likely played a role in the minor fluctuations of the total operations at ARB during the time frame in question, and as a result the minor fluctuations in the number of estimated B-II operations. Since the TAF (which is prepared by FAA personnel) shows that Total Annual Operations at ARB are forecasted to increase every year beyond year 2014, it is logical to conclude that operations by B-II category aircraft will also increase beyond the 538 that were documented in 2014. As noted in the text of revised Section 1.5.4 of the draft EA, even if B-II category operations do not increase in the future, but remain the same as in year 2014 (very unlikely if total operations are increasing), justification for the proposed runway extension would still be substantiated through the year 2040.</p>	<p>It appears that the document does not address why B-II aircraft operations have historically been steady or declined. Please add wording as to why it is believed that B-II operations will grow besides only referencing the TAF and MASP. Referencing the TAF and MASP only could lead the reader to believe that the growth identified in the TAF and MASP are the only aspects analyzed. In other words, add a description of why the TAF is relevant to the local conditions.</p>
<p>26</p>	<p>1.5.4</p>	<p>These numbers have been calculated based on the percentage of actual B-II operations to actual Total Operations. Why wasn't flight aware and FAA data used to determine actual usage by B-II aircraft over more years? Was FAA or Flight Aware data compared to the Airport User Survey data used for 2007, 2009, and 2014?</p>	<p>Changes made and clarification added to Section 1.5.4 as requested. In answer to FAA's questions, FlightAware data was used in the determination of B-II operations for survey data years 2007 and 2009, and FAA's Traffic Flow Management System Counts (TFMSC) data was used in the determination of B-II operations for survey data year 2014. This is clearly explained in User Survey Report Nos. 2, 3, and 4 (see Appendices A-2, A-3, and A-4 of the draft EA). Also, Exhibit 1 in each of these three reports shows a listing of the specific B-II category aircraft that were included in these</p>	<p>Please provide further clarification on why the 2014 data is best used to determine future B-II operations rather than using a larger subset of data (i.e. 5 year average).</p> <p>We recommend adding a comparison of the 2014 data used to a 5 year average to determine which is a better representation of operations to carry forward.</p>

28	1.6	2	<p>...as it does not currently meet the FAA design objectives" Recommend that all references to "FAA design objectives" be removed... the purpose should not be to meet FAA design objectives or put the onus on the FAA causing the runway length, but their user need for the longer runway.</p> <p>Clarity that 150' is being removed from the northeast end of the runway and added to the southwest end. Runway is being extended by 795'; please label the taxiway and/or delineate why it is being extended by 945' if the new runway portion will be 795' once the 150' is newly constructed.</p>	<p>Excerpt directly from Purpose and Need. The Purpose of the proposed actions is to provide facilities at ARB that fully accommodate the operational requirements of critical aircraft currently using the airport, while at the same time enhancing safety. Revised draft EA as appropriate</p> <p>Revised draft EA (addressed by Comment #35)</p>	<p>The Purpose and Need section no longer identifies "FAA design objectives." The 2nd para in Section 1.6 still includes this term.</p>
37	1.6	bullets 1, 2, 3	<p>This bullet needs to be removed. There are no AIP funds being sought or provided for this proposed action</p>	<p>State Apportionment and Non-primary entitlements are AIP funds</p>	<p>There will be unavoidable short-term impacts associated with the Preferred Alternative however, they are heavily outweighed by the positive impact the project will have on the operation and safety of ARB and its role in the community....p.36" Please clarify in the text if the runway is being demolished completely and rebuilt (new)</p>
44	1.7.1	3			<p>The discussion indicating FAA will provide environmental approval to allow SBGP funds to be eligible for projects is inaccurate. This statement is direct opposition to the FAA's Advisory Circular (AC) 150/5100-21 State Block Grant Program. The AC for SBGP clearly indicates that the SBGP state will provide the environmental approval to allow for SBGP funds to be for eligible projects. Only SBGP funds are being used therefore the State is has the responsibility to provide environmental approval. There is no Federal approval required for this proposed action in terms of funding.</p>
new	1.7.2		<p>The section labeled, "Other considerations" should be included in the purpose and needs section. These issues kept separate from the statement objectives makes it difficult to have a clear purpose and need statement and to recognize these as part of the project</p>	<p>On April 21 2015 the FAA-Region provided a 2011 Environmental Assessment from Bolingbrook's Cow International Airport, as an example for MDOT-AERO to follow while re-organizing and revising this draft. AERO put significant effort into modeling this draft after the Bolingbrook example and believes the content is consistent. The draft EA was revised to try and clarify the issue raised here, yet remain consistent with the example previously provided</p>	<p>New Comment: Insert bullet point under state actions. "The completion and approval of the EA and FONSI would result in the unconditional approval of the ALP."</p> <p>Purpose and Need Statement. The statement is not concise and is incomplete in establishing a purpose and need. This chapter does not provide clear justification for all of the issues that were included in the chapter. Additionally other considerations are presented but are not fully incorporated into the PIN chapter (and/or other chapters of the EA). Having a well-defined purpose and need statement along with adequate justification is critical in establishing the objectives that are used in identifying and developing the feasible alternatives</p>
45	1.8	all	<p>The proposed shift would enhance operational safety, and possibly prevent a runway incursion, by expanding the view of the hold area and parallel taxiway to ATCT personnel. Therefore, please clarify, does this shift cause other operational issues with the existing Northeasternmost hangar apron view still blocked from ATCT line of sight? How will aircraft taxi to the Southeast hangar section? - is 150 ft enough of a shift to remove the hot spot?</p>	<p>With the proposed shift of the A1 connector from Alpha Taxiway to Runway 06/24 to the southwest, the Line of Sight issue will be significantly improved. Aircraft entering the Movement Area from Echo, Delta and Charlie (east facing hangars only) will still have limited visual oversight by controllers. This will be a significant improvement over current conditions where all aircraft using the taxiway hold area of Runway 24 are in a restricted visibility area. The existing Delta taxiway from the southeast hangars will be shifted to the southwest as well under the proposed project. This will allow them full access from Runway 06/24 to the southeast hangar area with full visual access from the control tower. The proposed 150' shift will significantly improve the safety of ground operations of taxiing aircraft. While some visual restrictions for aircraft originating from the northeastern most T hangars will remain, it will be up the FAA to determine if this area should still be designated as a "hot spot."</p>	<p>This is good information and should be added to the document to emphasize how the line of sight issue will be physically improved. Discussion on further coordination with FAA on reviewing the "Hot Spot" after the runway shift should be included as the FAA Airport surface hot spot airport diagrams indicate that HS 1 is due to the "intersection of Two A1/A not visible from the center-Purpose and Need Statement. The statement is not concise and is incomplete in establishing a purpose and need. This chapter does not provide clear justification for all of the issues that were included in the chapter. Additionally other considerations are presented but are not fully incorporated into the PIN chapter (and/or other chapters of the EA). Having a well-defined purpose and need statement along with adequate justification is critical in establishing the objectives that are used in identifying and developing the feasible alternatives.</p>
50	1.8.1	1	<p>How old is the ATCT? Is it due for a modernization or rehab that might cause it to be beneficial to move it?</p>	<p>The ATCT was constructed in the mid-1970's and the attached office structure was constructed around 2003. The ATCT exterior was rehabbed within the last 5 years. The Airport is unaware of any pending plans for additional modernization or rehab</p> <p>Revised draft EA</p>	<p>We recommend adding this information in the document</p>
51	1.8.1	4	<p>Delete "disruption of Airport Traffic Control operations"</p>		<p>It appears that this comment was not addressed. This phrase was asked to be deleted, as FAA AT would not be disrupted in any manner - even temporarily - if the tower was to be relocated.</p>
53	1.8.1	4	<p>Justify the slope gradient based on page 2 of the AC 150/5325 (10) Effective Runway Gradient</p>	<p>The justification of the slope gradient based on page 2 of the AC 150/5325 (10) Effective Runway Gradient will be accomplished once detailed design is performed on the preferred alternative</p>	<p>if the gradient is at a certain number does that effect the size of the planes that can land? Please state so within the text.</p>
	1.8.2	5			

54	1, 6, 7	1	Regarding 150/5235 4-B, Figures AC 2-1 and 2-2, an engineer from ARPs stated that the charts support the runway being extended to 4,150 when the temperature is higher than 62.5°. But if the sponsor believes the longer runway is necessary please justify.	The mean daily maximum temperature of the hottest month of the year at ARB is 83.0 degrees F (July). The airport elevation is 839' MSL. When these numbers are factored into Figure 2-2 of FAA AC 150/5235-4B, the resulting recommended runway length is 4,200'. See the draft EA for additional information regarding the FAA recommendation of 4,200' versus the MDOT recommendation of 4,300'. (Section 1.5.3)	Why is there a need for the critical aircraft to be accommodated versus the current conditions? What is the reasoning justification; concern still that the goal is to utilize the large B-I planes? The FAA guidance only supports a runway length of 4,200 feet.
57	1, 8, 4	1	This section is being viewed as part of the justification for the statement. Commerce can not be of the PIN. Otherwise, other commerce alternatives will have to be included. Suggest that this section be removed	On April 21 2015 the FAA-Region provided a 2011 Environmental Assessment from Bolingbrook's Clow International Airport, as an example for MDOT-AERO to follow while re-organizing and revising this draft. AERO but significant effort into modeling this draft after the Bolingbrook example and believes the content is consistent. The items included as "Other Considerations" are not items to justify the proposed project but are other items that will be impacted if the proposed project is constructed. These items are of significant interest or impact that they warrant explanation	Purpose and Need Statement. The statement is not concise and is incomplete in establishing a purpose and need. This chapter does not provide clear justification for all of the issues that were included in the chapter. Additionally other considerations are presented but are not fully incorporated into the PIN chapter (and/or other chapters of the EA). Having a well-defined purpose and need statement along with adequate justification is critical in establishing the objectives that are used in identifying and developing the feasible alternatives.
68	1, 8, 4	1	Line of sight is not listed as an objective. Need to make sure the PIN statement is concise, clearly stated, focus, with justification and objectives. Please provide better clarity/flow when tracking the PIN section	Line of Sight is shown as a "Need" in the revised Purpose & Need section and is consistently addressed in each of the alternative evaluations	Purpose and Need Statement. The statement is not concise and is incomplete in establishing a purpose and need. This chapter does not provide clear justification for all of the issues that were included in the chapter. Additionally other considerations are presented but are not fully incorporated into the PIN chapter (and/or other chapters of the EA). Having a well-defined purpose and need statement along with adequate justification is critical in establishing the objectives that are used in identifying and developing the feasible alternatives.
69	2, 3, 5	1	Clarify that the preferred ALT 3 is to remove 150' from the east end of the runway, (adding back 150' on the west end) plus the adding the 795' and shifting to the southwest.	Revised draft EA	Please clarify if this is demolition of the runway or just a portion
73	2, 4	1	This section needs to use the environmental impact categories specified in FAA Order 1050.1F, paragraph 4-1	The draft EA has been in process continuously since 2009 and significant effort has gone into preparing it in accordance with FAA Orders 1050.1E and 5050.4B. Also as previously mentioned in this comment matrix the FAA-Region provided a 2011 Environmental Assessment from Bolingbrook's Clow International Airport, as an example for MDOT-AERO to follow while re-organizing and revising this draft. It was also prepared in accordance with 1050.1E. Because this change would result in no change to content and the regulatory agencies, tribes and public have previously reviewed the draft EA as is, MDOT-AERO proposes to leave the draft EA unchanged.	Please revise in accordance with original comment. As this EA was intended to be issued as a substantially new draft to the public, it must adhere to the requirements of new Order 1050.1F. The FAA provided the Bolingbrook Clow International Airport EA as a representative example of a document for the State to use as a guide to preparing the Draft EA for Ann Arbor. The FAA is prepared to discuss its applicability to this document with the State in the upcoming meetings.
74	3	all	What about the other noise impacts, such as from construction activities?	Noise associated with construction activities is covered in Construction Impacts category not the Noise category. (Section 3.15) Revised draft EA to clarify.	FAA Order 1050.1F no longer has a separate construction impacts category, so please revise this section accordingly
76	3, 1	1	The title of the methodologies need to be included in the paragraph	They are described in the same section	It appears that this was not included. Please revise.
81	3, 1	1	Preferred Alternative - Please delineate the projection out for the next five years	Revised draft EA. MDOT-Aero reevaluated the 2009 study in 2015 and found it to be substantially valid. (Section 3.1.3)	Per section 11.2 through 11.3 in the 1050.1F Desk Reference, describe the existing conditions (baseline) and the projection or forecast for the next 5 years.
89	4, 3	map	According to the Federal Register EPA 40 CFR Part 81 which was published in January of 2015, using the latest information from 2012 Annual Fine Particulate Matter NAAQS, Washenaw (Livingston, Macomb etc.) County, PM 2.5 is Unclassified attainment. Clarify that the data submitted is correct.	The following is an excerpt directly from the 2014 Michigan Annual Air Quality Report published in June 2015 - All Michigan counties from 2010-2014 met the 1997 annual PM2.5 standard of 15 µg/m3 and the 2006 24-hour PM2.5 standard of 35 µg/m3. The EPA designated Michigan in attainment of these standards in August 2013. In December 2012, the EPA revised the annual primary standard to 12 µg/m3 while the annual secondary standard remained at 15 µg/m3. The primary and secondary 24-hour standard remained as 35 µg/m3. The EPA has not made designations for the 2012 NAAQS revisions; however, PM2.5 concentrations are below 12 µg/m3 throughout Michigan. (DEQ 2016 Attainment Map Appendix C)	Discuss whether the public would be better served with a new AEDT modeling or screen?
90	3, 4	1	In regard to air quality, please provide the data from MDEQ (Do not see in Appendix D - there is a Land and Water Management and Wetlands letter)	Appendix D is specifically for "Early Agency Coordination" documentation. Appendix H is for "Additional Agency Correspondence" and includes the letter from MDEQ to EPA	It appears that this was not updated. Please update per original comment.

96	3.4	4	<p>It is not clear if this area is in a nonattainment area or maintenance area. Also not how this estimate was achieved. What calculations, models and sources were used. The citing of the court case should be removed and CAA regulations should be cited.</p>	<p>Based on the 2014 Annual Air Quality Report all of Michigan is in attainment. The following is an excerpt directly from the 2014 Michigan Annual Air Quality Report published in June 2015: "Michigan ambient NO2 levels have always been well below the NAAQS. Since March 3, 1978, all areas in Michigan have been in attainment for the annual NO2 NAAQS... all monitoring sites have had an annual NO2 concentration at less than half of the 0.053 ppm NAAQS. As such, the DEQ requested a designation of unclassifiable/attainment for the entire state. Unclassifiable/attainment means that there are no air quality measurements that would justify classifying these attainment areas as either serious or moderate nonattainment areas." (DEQ 2016 Attainment Map Appendix C)</p>	<p>Please update with the most recent air quality data</p>
103	3.5.2	4	<p>What about soils? The paragraph also mentions a new water line. Please provide more info on the water line.</p>	<p>The City replaced an existing raw (untreated) water line with a new 30" raw water line in 2010 along the east side of the airport. (Appendix H)</p>	<p>Please provide context for the new water line, as this is the first and only time it is mentioned in the document.</p>
107	3.8	2	<p>Last sentence. This discussion should be expanded. What does the agreement call for? Why does it exist?</p>	<p>This discussion is already included in Section 3.9 Threatened & Endangered Species and Section 4.2 Mitigation Measures.</p>	<p>Since this is the first time this is mentioned in the document, either describe the agreement, with Audubon or reference the section(s) in which it is discussed in greater detail.</p>
108	3.8	4	<p>Third sentence. What does the Audubon society think of this? Were they contacted as part of the EA public outreach process?</p>	<p>Revised draft EA</p>	<p>It appears that this comment was not addressed. Please revise document per original comment.</p>
111	3.9	3	<p>Update letters from 2009 for preferred alternative (Department of Natural Resources have instructions that may have changed)</p>	<p>As soon as this draft EA is finalized, the regulatory agencies will be contacted in writing and given the opportunity to review, comment and/or update their instructions.</p>	<p>Please update before the EA is finalized</p>
112			<p>Update June 2009 survey. As part of the wetlands analysis, was USACE contacted? If so, did they make a jurisdictional determination? Are there any wetlands on the Rwy 06 approach, as the USFWS map depicts a wetland area. What about the removal of the ODALS - will this action impact the wetlands?</p>	<p>Review of available data sources was completed in 2015 and appear largely consistent with what was found in 2009. MDOT-AERO will complete a re-site field review of project areas to confirm the presence of wetlands, or lack thereof, during project design to ensure proper permitting requirements are met. If necessary, in Michigan, the USACE only retains authority over certain wetlands, the USEPA has agreed that MDEQ has compliance responsibilities over all the rest. Both MDOT-AERO and MDEQ have concluded that the wetlands at ARB are not regulated by USACE.</p>	<p>The time to determine the presence of wetlands (and anticipated impacts) is during the NEPA process, not later during design. Although USACE may not have jurisdiction over the wetlands near the runway/airway what about the large wetland near the ODALS is that jurisdictional and will it be impacted by the removal of the ODALS in any way? Also, the 7/22/09 letter from MDEQ states that their findings are valid only until 7/21/12, so it would seem that this needs to be updated.</p>
118	3.10	1	<p>Why is this a separate section, as it is not an impact category?</p>	<p>Hazardous Waste Sites are an impact category under 1050.1E (Addressed by Comment No. 73).</p>	<p>This was referring to section 3.17, not 3.18. Comment remains valid. Please revise in accordance with Order 1050.1E</p>
125	4.2.2	1	<p>What about BMPs for air and water quality?</p>	<p>Addressed in Consequences of Preferred Alternative Sections of their respective impact categories</p>	<p>Although BMPs are mentioned in other sections, it is a good idea to mention them again, as they are a form of mitigation.</p>

June 21, 2017

VIA EMAIL

Ms. Cynthia Redinger, PE, PTOE
City of Ann Arbor
301 E. Huron St., P.O. Box 8647
Ann Arbor, MI 48107

RE: **Response to Comments**
1140 Broadway Traffic Impact Study-Revised Study
Ann Arbor, Michigan

Dear Ms. Redinger:

Fleis & VandenBrink (F&V) staff has completed this letter in response to the comments provided by the City of Ann Arbor in their review letter dated June 1, 2017, and to the comments provided by the City of Ann Arbor and HRC in their review letters dated June 1 and 2, 2017 respectively and the meeting held on June 12, 2017 to discuss the comments. F&V's responses to these comments pursuant to the conversations and correspondence with HRC and the City of Ann Arbor are summarized herein.

Furthermore, as a general note, the Morningside Lower Town TIS Report and associated Synchro and SimTraffic files have been revised to reflect the comments provided by the City of Ann Arbor and HRC as reproduced herein. To accurately evaluate the study intersections, two sets of analysis Synchro models were developed.

The first set of Synchro analysis files were used to conduct the Highway Capacity Manual (HCM) analysis. The second set of Synchro analysis files were used to run the SimTraffic microsimulation to model the SCOOT adaptive signal system as accurately as possible. Although the SimTraffic analysis software is not capable of adjusting signal phase splits and offsets in real-time like the SCOOT adaptive traffic controllers in use in the City of Ann Arbor at several of the study intersections, optimizing the signal phase splits and offsets at all study intersections to the greatest extent possible allowed for more accurate modeling of projected traffic conditions.

City of Ann Arbor Comments – June 1, 2017

1. *Moore & Pontiac Trail, Westbound Moore approach lane assignment should have shared LT/Thru and RT. Right turn movement does not have STOP control, and enter blocked intersection.*

The Synchro model and the TIS have been updated to reflect these operations.

2. *SB Pontiac Trail approaching Swift should have both lanes continue to SB swift approaching Broadway.*

The Synchro model and the TIS have been updated to reflect this geometry.

3. *Broadway & Plymouth, remove median on south leg; vehicle-lane assignment is incorrect.*

The Synchro model and TIS has been updated to reflect this geometry.

4. *Broadway/Plymouth & Maiden, outbound Broadway should be perm-prot, instead of permissive only; phasing sequence is incorrect.*

The Synchro model and the TIS have been updated to reflect these operations

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5. *Broadway & Swift, SB Swift should be NTOR.*

The Synchro model and the TIS have been updated to reflect these operations

6. *Why the signalized intersections at Fuller & Cedar Bend, and at Fuller & Bonisteel are not analyzed, and skipped to the signalized intersection at Fuller & Glaizer.*

These intersections were added into the model at the request of the City for modeling purposes only. No operational analysis was provided for these intersections nor are they included in the TIS.

7. *What is the design (horizon) year for Fuller/Maiden intersection? Should Lower Town look at least 5-10 years after build-out, as this is a complex development generating more than 300 peak hour trips?*

A five-year horizon (2027) analysis has been completed in the revised TIS.

8. *Maiden & Neilson signal warrant analysis should cover all applicable warrants. Lack of traffic data should not be the reason for not evaluating signal warrant. Pedestrian related signal warrants should also be evaluated.*

Pedestrian-related signal warrants were evaluated; traffic control signalization is not warranted at this location on the basis of peak hour or four-hour pedestrian volumes. The relevant signal warrants are included in the revised TIS.

HRC Comments – June 2, 2017

A. Synchro/SimTraffic Models

1. *Confirm existing operation of Broadway/Maiden Lane intersection and westbound Maiden Lane right turn overlap in the existing Synchro models.*

This right-turn overlap was added at the request of the City. It was also observed during the field review performed at this intersection.

2. *The existing and background PM SimTraffic models freeze up when running.*

This has been corrected in the revised analysis. As noted above, the simulation-specific analysis files are included with the deliverables.

B. Existing with Improvements

3. *An exclusive right turn lane for westbound Maiden Lane to northbound Plymouth Street is recommended in the study; however, this is existing. It appears that an exclusive left turn lane is being recommended by the study. Please clarify.*

The recommendations of the study include the following:

“Construct additional lane to provide a three-lane approach at the westbound Maiden Lane approach (turning north on Plymouth Road). Provide a left turn lane, a through lane, and a right turn lane at this approach.”

4. *During the PM peak hour, the southbound Plymouth Road queues at Broadway Street/Maiden Lane/Moore Street are still unacceptable.*

This has been corrected in the revised analysis. Simulation-specific analysis files are included in the submission package.

C. Background with Improvements

5. *During the PM peak hour, the southbound Plymouth Road and northbound Broadway Street queues at Maiden Lane/Moore Street are still unacceptable.*

This has been corrected in the revised analysis. As noted above, the simulation-specific analysis files are included with the deliverables.

D. Trip Generation

6. *The total new trips in Table 6 should be total trips generated minus the pass-by trips. Please revise.*

This typographical error has been corrected.

7. *Revise the calculated person-trips in Table 8 as rounding is still off.*

A typographical error has been corrected in the table, but the trip generation calculations are correct.

8. *Describe how the pass by trips were included in the modal split trip generation (Table 10).*

The remaining pass-by trips not accounted for in the Vehicular Trips pass-by calculations were assumed to be mid-block pedestrian pass-by trips. This pedestrian pass-by travel pattern involves exiting and re-entering a mid-block sidewalk to reach the retail storefronts; these trips do not appear on the study road network.

9. *The note for Table 10 states that the values have been rounded up to the nearest whole number. This is not always the case.*

Since we are using person-trips, for this study it is important to remember that the modal split trip generation numbers displayed in Table 10 will not add up to the person-trip generation numbers displayed in Table 8 because of the vehicle occupancy rates utilized in the calculations. A single vehicle trip is not equivalent to a single person-trip.

E. Trip Distribution and Assignment

10. *Explain why only pass-by trips were shown entering the parking area south of the Broadway Avenue/W. Site Drive and no new trips were added here.*

While it is reasonable to assume that some new trips may also utilize this parking area, all new trips associated with the retail development were assigned to the site driveways. This created a reasonable composition of both *pass-by* and *new* site-generated retail trips utilizing the storefront parking area and the site driveways.

11. *Existing pass-by trips are not shown leaving any site drives in Figure 5. Please revise.*

The pass-by trips are shown using the parking area directly adjacent to the storefronts.

F. Future with Improvements

12. *During the AM and PM peak hours, the intersection of Plymouth Road/Broadway Street/Maiden Lane/Moore Street has approaches that operate with unacceptable levels of service and delays worse than background with improvements. Provide recommendations for mitigating this increase in delay.*

The intersection capacity has been increased to the maximum reasonable extent allowable. This additional capacity will be efficiently utilized by the constant adjustments of the SCOOT adaptive signal system.

It is also important to note that in general, *Future Conditions with Improvements* operates better than *Background Conditions*, and many movements and approaches currently operating with critical delays and LOS have been mitigated with the proposed improvements, which are warranted under existing conditions. This comparison is shown in Table 14 in the revised TIS.

G. Broadway Street and Proposed Site Driveway-Intersection Alternatives

13. *The all-way stop, three-way stop, roundabout and signalize options shows vehicles waiting to make the left turn from westbound Broadway Street to southbound Plymouth Road backing up through the intersection/roundabout.*

The SimTraffic analysis outputs, which show the average of five simulation runs conducted for each analysis scenario, display a 95th percentile queue length on this approach of 103 feet and 180 feet (4-8 vehicles) during the AM and PM peak hours, respectively. It is possible that occasional short periods of vehicle queues could extend through the intersection on an isolated single signal cycle basis, the capacity at the signalized intersection of Plymouth Road and Broadway Street will also be efficiently utilized by the constant adjustments of the SCOOT adaptive signal system. Overall, any of the three options (traffic signal control excluded) for traffic control at this intersection will operate acceptably, with the roundabout providing the best option.

H. Conclusions

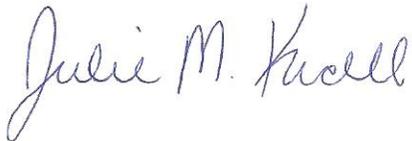
14. *Conclusions number 2 and 10 have contradicting information.*

This has been updated in the revised TIS report.

If you have any questions or concerns, please contact our office.

Sincerely,

FLEIS & VANDENBRINK ENGINEERING, INC.



Julie M. Kroll, PE, PTOE
Sr. Project Manager

BMH:jmk

Attached:

City of Ann Arbor Comments from June 1, 2017

HRC Comments from June 2, 2017



TO: Alexis DiLeo, Planning and Development Services Unit

FROM: Luke Liu, Project Management Services Unit

DATE: June 1, 2017

SUBJECT: SP17-009 Traffic Review

CC: via TRAKiT

In addition to HRC independent review.

- Moore & Pontiac Trail, Westbound Moore approach lane assignment should have shared LT/Thru and RT. Right turn movement does not have STOP control, and enter blocked intersection.
- SB Pontiac Trail approaching Swift should have both lanes continue to SB swift approaching Broadway.
- Broadway & Plymouth, remove median on south leg; vehicle-lane assignment is incorrect.
- Broadway/Plymouth & Maiden, outbound Broadway should be perm-prot, instead of permissive only; phasing sequence is incorrect.
- Broadway & Swift, SB Swift should be NTOR.
- Why the signalized intersections at Fuller & Cedar Bend, and at Fuller & Bonisteel are not analyzed, and skipped to the signalized intersection at Fuller & Glaizer.
- What is the design (horizon) year for Fuller/Maiden intersection? Should Lower Town look at least 5-10 years after build-out, as this is a complex development generating more than 300 peak hour trips?
- Maiden & Neilson signal warrant analysis should cover all applicable warrants. Lack of traffic data should not be the reason for not evaluating signal warrant. Pedestrian related signal warrants should also be evaluated.

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June 2, 2017

City of Ann Arbor
301 E. Huron St, PO Box 8647
Ann Arbor, MI 48107

Attn: Cynthia Redinger, PE, PTOE, Traffic Engineer

Re: 1140 Broadway
Traffic Impact Study Review

HRC Job No. 20170332

Dear Ms. Redinger:

Hubbell, Roth & Clark, Inc. (HRC) and the City have reviewed the revised Morningside Lower Town Traffic Study conducted by Fleis & Vandenbrink dated May 15, 2017. Our comments are as follows:

≡ Synchro/SimTraffic Models

- ≡ Remove the additional eastbound through lane, east of the dummy node between Fuller Road and Neilson Court.
- ≡ The westbound Moore approach lane assignment at Pontiac Trail should have one shared left turn/through lane and one dedicated right turn lane, the right turn movement is not stop controlled and allow vehicles to enter blocked intersection.
- ≡ Southbound Pontiac Trail approaching Swift Street should have both lanes continue to southbound Swift Street approaching Broadway Street.
- ≡ Remove the median on the south leg of the Broadway Street/Plymouth intersection and correct the vehicle-lane assignment.
- ≡ At Broadway Street/Plymouth and Maiden, outbound Broadway Street should be permissive-protective, instead of permissive only. The phasing sequence is incorrect.
- ≡ Southbound Swift at Broadway should be no turn on red.
- ≡ Include the signalized intersections of Fuller Road/Cedar Bend Drive and Fuller Road/Bonisteel Boulevard in the model.
- ≡ The existing and background PM SimTraffic models freeze up when running.

≡ Existing with Improvements

- ≡ An exclusive right turn lane for westbound Maiden Lane to northbound Plymouth Street is recommended in the study; however, this is existing. It appears that an exclusive left turn lane is being recommended by the study. Please clarify.
- ≡ During the PM peak hour, the southbound Plymouth Road queues at Broadway Street/Maiden Lane/Moore Street are still unacceptable.

≡ Background with Improvements

- ≡ During the PM peak hour, the southbound Plymouth Road and northbound Broadway Street queues at Maiden Lane/Moore Street are still unacceptable.

≡ Trip Generation

- ≡ The total new trips in Table 6 should be total trips generated minus the pass-by trips. Please revise.
- ≡ Revise the calculated person-trips in Table 8 as rounding is still off.
- ≡ Describe how the pass by trips were included in the modal split trip generation (Table 10).
- ≡ The note for Table 10 states that the values have been rounded up to the nearest whole number. This is not always the case.

≡ Trip Distribution and Assignment

- ≡ Explain why only pass-by trips were shown entering the parking area south of the Broadway Avenue/W. Site Drive and no new trips were added here.
- ≡ Existing pass-by trips are not shown leaving any site drives in Figure 5. Please revise.

≡ Future with Improvements

- ≡ Provide a more complete signal warrant analysis at the intersection of Maiden Lane and Nielson Court. Even though 24-hours of data were not collected, the five hours that were can still be applied to all the warrants. Pedestrian related warrants should also be considered.
- ≡ During the AM and PM peak hours, the intersection of Plymouth Road/Broadway Street/Maiden Lane/Moore Street has approaches that operate with unacceptable levels of service and delays worse than background with improvements. Provide recommendations for mitigating this increase in delay.

≡ Broadway Street and Proposed Site Driveway-Intersection Alternatives

- ≡ The all-way stop, three-way stop, roundabout and signalize options shows vehicles waiting to make the left turn from westbound Broadway Street to southbound Plymouth Road backing up through the intersection/roundabout.

≡ Conclusions

- ≡ Conclusions number 2 and 10 have contradicting information.

In addition, the City is requesting a design horizon year of 10 years after build out to be included in the study due to the large size of the development and high number of projected peak hour generated trips.

Ms. Cynthia Redinger, PE, PTOE
June 2, 2017
HRC Job Number 20170332
Page 3 of 3

If you have any questions or require any additional information, please contact the undersigned.

Very truly yours,

HUBBELL, ROTH & CLARK, INC.

Lia Michaels

Lia Michaels, P.E., PTOE
Project Engineer

LFM/lfm

pc: City of Ann Arbor; Luke Liu
HRC; C. Hill-Stramsak, File



TO: Alexis DiLeo, Planning and Development Services Unit

FROM: Cynthia Redinger, Luke Liu, Public Services - Engineering

DATE: September 18, 2017

SUBJECT: SP17-009 Traffic Review

CC: via TRAKiT

The application is approved once the following mitigation need is addressed in transportation impact analysis.

With site-generated trips, the intersection of Maiden Lane & Nielsen Court meets criteria for RRFB to assist servicing non-motorized demand crossing Maiden Lane. Traffic volume on Maiden Lane is very high during commuting peaks that there is no sufficient gap for safe crossing. The intersection of Maiden & Nielsen shall be equipped with a standard traffic signal or RRFB crossing treatment.

Review Memo

To: Alexis DiLeo, Planning and Development Services
Cynthia Redinger, PE, PTOE, Public Services Area – Engineering
From: Luke Liu, PE, PTOE, Public Services Area - Engineering
CC: Via Trakit
Date: August 25, 2017
Re: SP17-009: 1140 Broadway

This application is **not** recommended for approval.

Transportation Impact Analysis:

The applicant's engineer provided responses to the following comments. Several of the comments have not been satisfied at this time.

- Future with Improvements: *Provide a more complete signal warrant analysis at the intersection of Maiden Lane and Nielson Court. Even through 24-hours of data were not collected, the five hours that were can still be applied to all the warrants. Pedestrian related warrants should also be considered.*
 - The applicant's engineer has not completed the work requested. The previously requested analysis shall be submitted as a condition to traffic engineering approval. The requested analysis at the intersection of Maiden Lane and and Nielsen Court will be used to determine if a traffic signal is currently warranted, if conditions nearly meet warrants, or if another type of device is required to support pedestrians and bicyclists crossing Maiden Lane at Nielsen Court. Submittal of signal warrant spreadsheet as an Excel file is required.
- Future with Improvements: *During the AM and PM peak hours, the intersection of Plymouth Road/Broadway Street/Maiden Lane/Moore Street has approaches that operate with unacceptable levels of service and delays worse than background with improvements. Provide recommendations for mitigating this increase in delay.*
 - The applicant's engineer has clarified their analysis results. The resulting proposed conditions analysis results will not meet the requirements established in the City's Land Use Regulations Attachment D. In order to offset this deficiency traffic engineering staff recommends the applicant's mitigation strategy include additional traffic detection to optimize SCOOT signal control operations. The recommended strategy includes motor vehicle detection and bicycle detection

using GRIDSMAART camera at the existing signalized intersections of Broadway & Swift, Broadway & Maiden, Plymouth & Broadway, and Barton & Plymouth.

- Broadway Street and Proposed Site Driveway-Intersection Alternatives: *The all-way stop, three-way stop, roundabout and signalize options shows vehicles waiting to make the left turn from westbound Broadway Street to southbound Plymouth Road backing up through the intersection/roundabout.*
 - The applicant's proposed intersection does not meet the recommendations of the Michigan Access Management Guidebook for corner clearance. While the existing public right of way access, i.e. the old Broadway alignment, has an access point at this location that access point is extremely low volume. The proposed site access will create a scenario with far more trips destined for the existing signalized intersection. The applicant has proposed a roundabout at this location to minimize the negative impacts of the new intersection on the existing signalized intersection. The applicant's engineer has acknowledged that the queuing will occasionally extend between the two intersections creating an undesired condition.

Responses to further staff comments include:

- The engineer's response to these comments does not acknowledge the City's need to review the requests data and analyses in order to ensure a complete transportation system that will be reasonably safe and convenient for all modes of travel. Only the output of some analyses were provided. Please provide source analysis for review as previously requested.