3.8 Environmental Justice

3.8.1 Introduction and Summary

This section contains a description of the methods used to identify minority and low-income populations and evaluate potential environmental justice issues. The discussion includes long-term implications for environmental justice communities related to development of the Central Corridor LRT project, along with short-term construction impacts and potential mitigation measures.

In determining compliance with Title VI of the Civil Rights of Act of 1964 and the intent of Executive Orders 12898 and 13166, along with the USDOT Final Order on Environmental Justice, and FTA Circular 49 CFR 21.5, this analysis examines whether the Preferred Alternative provides transit service equity, whether minority or low-income populations are disproportionately exposed to the adverse effects associated with the project's development, and whether these communities have had the opportunity to participate in activities related to planning the project.

3.8.2 Legal and Regulatory Context

Environmental justice in the context of transportation project development began with the issuance of Executive Order 12898 "Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations" on February 11, 1994. This order requires federal agencies to "Identify and address disproportionately high and adverse human health or environmental effects of federal policies, programs, and activities on minority and low-income populations." Key provisions of the order include:

- To the greatest extent practicable and permitted by law, each Federal agency shall
 make achieving environmental justice part of its mission by identifying and addressing,
 as appropriate, disproportionately high and adverse human health or environmental
 effects of its programs, policies, and activities on minority populations and low-income
 populations [Subsection 1-101].
- Each Federal agency shall conduct its programs, policies, and activities that substantially affect human health or the environment, in a manner that ensures that such programs, policies, and activities do not have the effect of excluding persons (including populations) from participation in, denying persons (including populations) the benefits of, or subjecting persons (including populations) to discrimination under such programs, policies, and activities, because of their race, color, or national origin [Subsection 2-2].
- Each Federal agency shall work to ensure that public documents, notices, and hearings relating to human health or the environment are concise, understandable, and readily accessible to the public [Subsection 5-5 {c}].

The United States Department of Transportation (USDOT) issued its *Final Order on Environmental Justice* on April 15, 1997 [DOT Order 5610.2, "Environmental Justice" (April 15, 1997)]. This document provides guidance to state agencies receiving USDOT funding on implementing environmental justice requirements pursuant to Executive Order 12898. The Minnesota Department of Transportation (MnDOT) issued *Hear Every Voice: a Guide to Public Involvement at MnDOT*, which contains the *Environmental Justice Draft Guidance*, along with the USDOT regulations, and suggested guidance for engaging non-traditional transportation stakeholders in June 1999. In accordance with these guidelines, a public

involvement plan was developed and implemented for the Central Corridor LRT project (see Chapter 11, Public and Agency Coordination and Comments).

The Central Corridor LRT project's public involvement activities have included extensive and intentional efforts to engage environmental justice communities, informing residents about the project and providing opportunities for participation in the project's evaluation, planning, alternative development, station locations development activities, and environmental issues. These efforts have included public presentations to and meetings with minority community groups and civic organizations, public open houses and general information sessions, stakeholder meetings, small group and one-on-one meetings, diversity training and strategies to engage non-traditional stakeholders. Regular meetings have occurred with groups such as the National Association for the Advancement of Colored People (NAACP), the Urban League, the St. Paul African American Leadership Council (AALC), the Listening House Homeless Shelter, Union Gospel Mission, Berean Church, and Central Towers Assisted Living among several other community groups, churches and organizations. The Community Outreach Staff include several persons fluent in languages spoken by community residents for whom English is a second language. Interviews and public service announcements were also made in local and regionally broadcast ethnic media outlets including, print, television and radio programs in Somali, Hmong, Vietnamese, Thai, and Spanish. Media outlets have included the Minnesota Spokesman Recorder, Hmong Today, Hmong Times, African News Journal, Asian American Press, the Minnesota Women's Press, Vietnamese Broadcasting of Minnesota, along with Hmong and Somali local television news programs. Details about when, where, with whom, and what was discussed at the outreach meetings conducted by the project are provided in Appendix F.

In addition to considering minority and low-income populations, Executive Order 13166 entitled "Improving Access to Services for Persons with Limited English Proficiency," issued on August 11, 2000, establishes the compliance standards for Federal agencies and recipients of Federal funding to provide services to those persons for whom English is not their primary language. On May 13, 2007, the Federal Transit Administration issued an Advisory Circular entitled "Title VI and Title VI-Dependent Guidelines for Federal Transit Administration Recipients," reaffirming the requirements set forth in EO 12898 and EO 13166. As described in the Title VI Circular issued by the FTA, the finding of environmental justice impacts consists of the following steps:

- 1. A description of the low-income and minority population within the study area affected by the project, and a discussion of the method used to identify this population (e.g., analysis of Census data, minority business directories, direct observation, or a public involvement process).
- 2. A discussion of all adverse effects of the project both during and after construction that would affect the identified minority and low-income populations.
- A discussion of all positive effects that would affect the identified minority and lowincome population, such as an improvement in transit service, mobility, or accessibility.
- 4. A description of all mitigation and environmental enhancement actions incorporated into the project to address the adverse effects, including, but not limited to, any special features of the relocation program that go beyond the requirements of the Uniform Relocation Act and address adverse community effects such as separation or cohesion issues; and the replacement of the community resources destroyed by the project.

5. A discussion of the remaining effects, if any, and why further mitigation is not proposed.

The following discussion of environmental justice effects related to the implementation of the Central Corridor LRT Preferred Alternatives is consistent with the procedures as discussed in the Title VI circular (FTA C 4702.1A, page IV-4) and as part of assessing the impacts of the Central Corridor LRT project to environmental justice populations consistent with Executive Order 12898 and the USDOT's Final Order on Environmental Justice as issued April 15, 1997.

3.8.3 Identifying Protected Populations in the Study Area

This section contains a description of the methodology used to identify minority or low-income populations. This section also provides an analysis and discussion of Limited English Proficiency (LEP) populations living within the project area, pursuant to the guidelines set forth in Executive Order 13166, which requires federal agencies, programs and activities to identify any need for services to those persons who, by virtue of national origin, "are limited in their English proficiency (LEP)" in order to ensure nondiscrimination on the basis of national origin and the meaningful participation and access to those public services.

Determining the presence of low-income, minority, and Limited English Proficiency (LEP) populations in the Central Corridor was done through an analysis of Census data. The analysis considered several population characteristics as they pertained to minority and low-income populations including total population and households, population by age, race and ethnicity, individual and household income, poverty, and housing status. Additional social factors were considered including vehicle accessibility, English language proficiency, and disability status.

As described in the USDOT Final Order on Environmental Justice (Federal Register, Vol. 62, No. 72), minority populations are defined in the following ways: Black (a person having racial origins in any of the black racial groups of Africa), Hispanic (a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race), Asian American (a person having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands), or American Indian and Alaskan Native (a person having origins in any of the original people of North America and who maintains cultural identification through tribal affiliation or community recognition). Lowincome persons have an individual or household income at or below the Department of Health and Human Services poverty guidelines. A "population" of low-income or minority persons is defined as a group of people who live in geographic proximity, and if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected.

For the purposes of the Central Corridor LRT project's analysis of environmental justice impacts, the area for assessing the presence of protected populations was defined as one-half mile on either side of the proposed alignment, or the "walkshed" area for the Central Corridor. Furthermore, a comparison geographic area at the County level (Hennepin and Ramsey) was established as part of the identification of protected populations.

3.8.4 Existing Conditions

This section identifies the minority, low-income, and special populations potentially affected by construction of the Preferred Alternative.

3.8.4.1 Minority Populations

Persons responding to Census 2000 self-identified their race based on a perception of racial identify. Ethnicity is defined as the classification of a population that share common characteristics such as ancestry, religion, traditions, culture, language, tribal or national origin.

Table 3.8-1 shows the total population and percent of total population by identified racial or ethnic heritage, as defined by U.S. Census Bureau in 2000, for Hennepin and Ramsey Counties compared with the one-half mile study area in the Central Corridor. Compared to Hennepin and Ramsey Counties, the Central Corridor study area has a greater percentage of ethnic minorities.

Race/Ethnicity	Hennepin County		Ramse	y County	Central Corridor Study Area	
	Number of Persons	Percentage of Total	Number of Persons	Percentage of Total	Number of Persons	Percentage of Total
White (Non-Hispanic)	898,921	80	395,406	77	64,573	54
Black or African- American	99,943	9	38,900	8	24,121	20
Hispanic or Latino ^a	45,439	4	26,979	5	8,310	7
Asian	53,555	4	44,836	9	15,101	13
All Others ^b	63,781	6	31,893	6	6,933	6
Total ^c	1,116,200	100	511,035	100	119,038	100

Table 3.8-1. Population and Percent of Total Population by Identified Racial or Ethnic Heritage

Source: U.S. Census Bureau, Census 2000 Summary File 1 (SF 1), 2001

As Table 3.8-1 outlines above, in 2000 there was a small majority of non-Hispanic white persons living in the Central Corridor study area. However, ethnic minority populations comprise a significant portion of study area population (46 percent), and account for a higher total minority population percentage than Hennepin County (19 percent) and Ramsey County (23 percent) (excluding the Hispanic or Latino category). Within the study area, the Black or African-American population represents the largest ethnic minority group next to non-Hispanic Whites with the Asian community being the next largest ethnic community group.

Figure 3.8-1 shows the locations of minority populations by Census block group within the study area. Although distributed throughout the study area, the highest concentrations of minority populations are located along University Avenue from Rice Street to Snelling Avenue. Minority populations also represent a significant portion of the downtown St. Paul population. In Minneapolis, the Cedar-Riverside neighborhood located just east of Downtown Minneapolis is home to a concentration of ethnic minorities, comprised primarily of recent Somali and East African immigrants. As shown by the data, minority populations of African-Americans and Somali or other East African immigrants are also higher near the Hubert H. Humphrey Metrodome and in

^a By Census Bureau definition, the ethnic category "Hispanic or Latino" includes persons of any race.

^b The category "All Others" includes American Indian and Alaska Native, Native Hawaiian and other Pacific Islander, "some other race," and persons who identified themselves as being of two or more races.

^c The final totals for number of persons and percentage of totals in the counties exclude the Hispanic or Latino ethnic category to avoid double counting. When the columns are summed including the Hispanic or Latino ethnic category, the total number of persons is higher than the stated final total, and the percentage of total is greater than 100%.

the Elliot Park neighborhood of Minneapolis. Native American populations are highest along Franklin Avenue between the Franklin Avenue Hiawatha LRT station and Interstate 35W.

3.8.4.2 Low-Income Populations

Low-income populations were identified through an examination of U.S. Census block group level data for one-half mile on each side of the proposed alignment. Consistent with the definition of low-income established by the USDOT Final Order on Environmental Justice, persons living in poverty within the study area of the Central Corridor were identified in order to determine any adverse impacts as a result of construction and operation of the Preferred Alternative. In addition, an expanded analysis identifying low-income populations included households within the project area whose median household income is 80 percent or less than the county median. The study area traverses portions of both Ramsey and Hennepin Counties. Ramsey County, the county with the lower median household income level, was used for the calculation. Table 3.8-2 compares income characteristics of the Central Corridor with Hennepin and Ramsey Counties.

In 2000, the median household income of Ramsey County was \$45,722 and 80 percent of this value is \$36,577. Therefore for the purposes of this study, households with incomes below \$36,577 were defined as low income. Within the study area, 64 Census block groups were identified as having median incomes below \$36,577 annually. The Census Bureau identifies approximately 33,719 households within these 64 block groups (U.S. Census Bureau, 2000).

Characteristic	Hennepin County		Ramsey County		Study Area	
	Population	Percentage of Total County Population	Population	Percentage of Total County Population	Population	Percentage of Total Study Area Population
Persons Below Poverty Level ^a	90,384	8.3	52,673	10.6	27,338	22.9
Median Household Income	\$51,711		\$45,722		\$29,912 ^b	

Table 3.8-2 2000 Income Characteristics

Source: U.S. Census Bureau, Census 2000 Summary File 3 (SF 3), 2001.

^a U.S. Census Bureau Poverty Definition: "Following the Office of Management and Budget's (OMB) Statistical Policy Directive 14, the Census Bureau uses a set of income thresholds that vary by family size and composition to determine who is in poverty. If a family's total income is less than the family's threshold, then that family and every individual in it is considered in poverty. The official poverty thresholds do not vary geographically, but they are updated for inflation using Consumer Price Index (CPI-U). The official poverty definition uses money income before taxes and does not include capital gains or non-cash benefits (such as public housing, Medicaid, and food stamps)."

This figure represents the weighted average of median incomes for the Census block groups located within the Central Corridor LRT study area. A weighted average was used because median household incomes for Census block groups within the corridor varied. In order to determine the median household income for the entire corridor, the total number of households in each Census block group were weighted against the median household incomes for the block group, and averaged across the entire number of households in the study area. The final figure was rounded to the nearest whole dollar value.

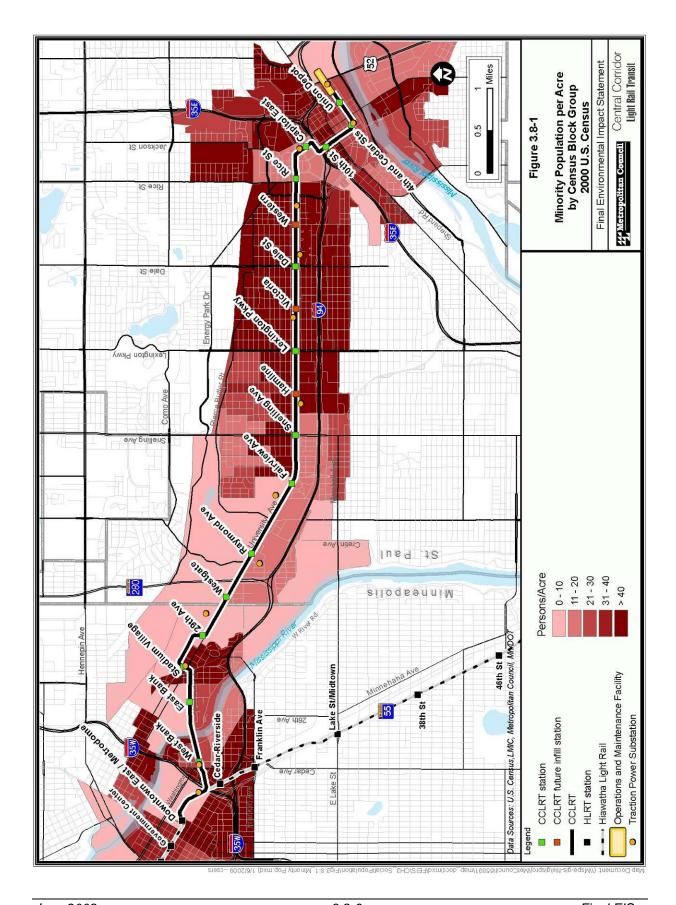


Figure 3.8-2 displays the distribution of median household incomes for the study area. Areas with significantly lower incomes are predominantly located north, south, and west of downtown St. Paul. Along the corridor, median household incomes are also relatively low in the Midway East segment, with incomes moderately rising in the Midway West segment. Low-income populations are also located on the southeast side of Downtown Minneapolis, particularly the Elliot Park neighborhood south of the Downtown East/ Metrodome Hiawatha LRT station. Median household incomes rise in select Census block groups paralleling the river in Downtown Minneapolis, an area that has recently seen significant residential and some commercial development. Incomes are lowest surrounding the University of Minnesota. Relatively few households are located within the Census block groups that surround the University of Minnesota. The primary form of housing on the campus is dormitories populated by students for select periods of time. Students typically comprise a lower-income group, and that group is reflected in the data (Figure 3.8.3).

3.8.4.3 Other Populations

Additional social and demographic factors often play a role in determining transit dependency. Although the 2000 Census contains a wealth of social data that could be considered part of any analysis, age, disability, language proficiency, and access to a personal vehicle were selected as demographic characteristics for consideration as part of this analysis.

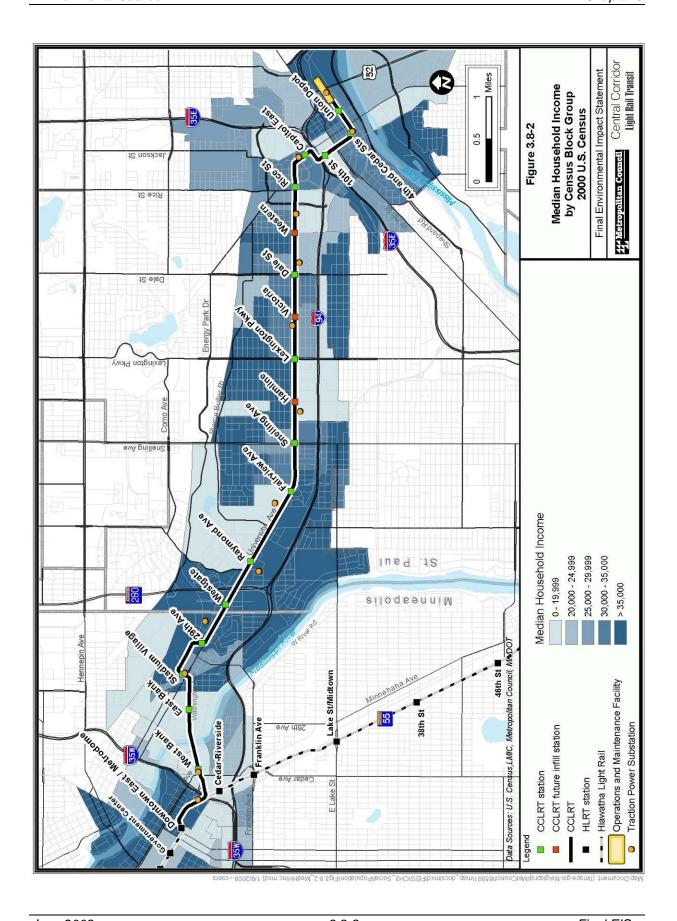
Age

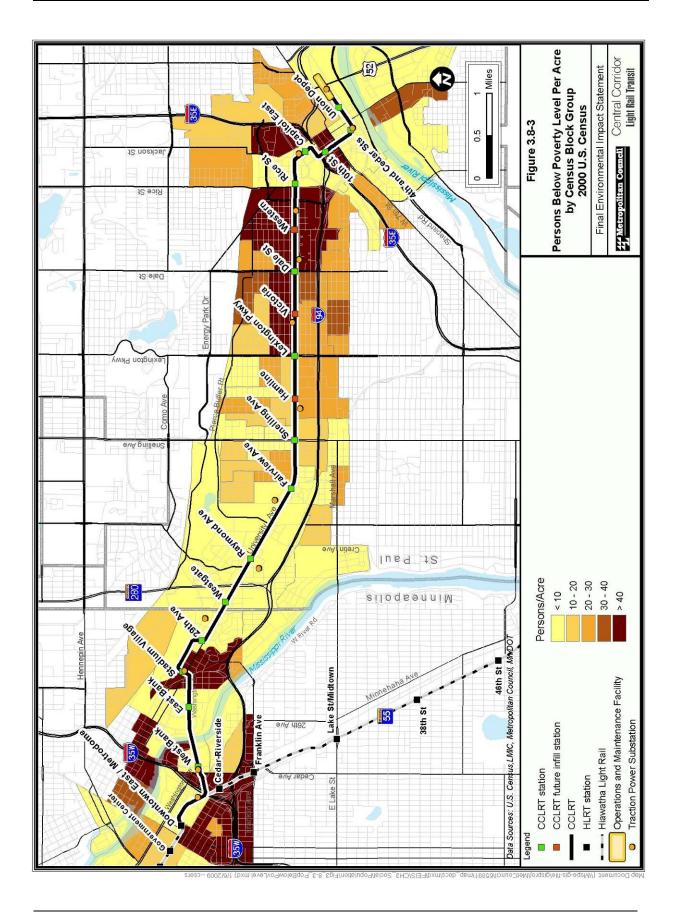
Age has a direct impact on a person's mobility, and as such, can play a determining factor in transit ridership. Adolescent populations must cope with driving age restrictions, and are dependent upon others for transportation Elderly populations may not have access to vehicles, may not wish to drive, or may be physically incapable of operating a vehicle. Transit service provides independence and mobility for both of these populations. Table 3.8-3 displays the age and percentage of population by age for the study area compared to Hennepin and Ramsey Counties. According to the data, the 2000 Census indicates that the majority of residents in the study area are between the ages of 18 and 64.

Age Cohort **Hennepin County Ramsey County** Study Area Percentage **Number of** Number Percentage Number Percentage Persons of Total of of Total of of Total **Persons Persons** Under 18 267,319 24 130,629 26 24,405 21 Years 18 to 64 726,998 65 320,854 83,772 70 63 Years 65 Years 121,883 11 59,552 10,861 9 12 and Over Total 1,116,200 100 511.035 100 119.038 100

Table 3.8-3 Age and Percentage of Population

Source: U.S. Census Bureau, Census 2000 Summary File 1 (SF 1), 2001.





Disabled Persons

The 2000 Census data indicate approximately 42,734 persons living within the study area identified themselves as having a disability. According to the data, persons with disabilities are distributed throughout the study area, with some noticeable concentrations. This is likely due to the availability of special needs housing facilities for persons with specific disabilities. Persons with disabilities, as defined by the U.S. Census, present a special user group that requires a transit system which is responsive and sensitive to their mobility needs. Metro Transit buses currently traveling in the Central Corridor are accessible for persons with special transportation needs. The Metropolitan Council and Metro Transit currently provide the Metro Mobility transportation service, an ADA-compliant paratransit service for certified riders unable to use regular fixed-route buses. The Hiawatha LRT station platforms and trains allow for easy access and safe travel on-board trains; the Central Corridor stations and trains will provide a similar set of facilities.

Limited English Proficiency

Public transportation serves as a vital means of mobility for many Limited English Proficiency (LEP) persons, particularly new immigrants to a community who may otherwise not have access to a private vehicle. Pursuant to the guidelines established by Title VI of the Civil Rights Act of 1964 and Executive Order 13166 (as outlined above), an analysis of non-English speaking populations and households was conducted to identify concentrations of LEP populations living within the study area. This analysis was conducted in accordance with FTA analysis methods as outlined in "Implementing the Department of Transportation's Policy Guidance Concerning Recipients' Responsibilities to Limited English Proficient (LEP) Persons: A Handbook for Public Transportation Providers," published on April 13, 2007.

Table 3.8-4 details English proficiency for the study area LEP population. The 2000 Census provides data on the number of persons aged 5 and above who self-identified their ability to speak English "very well," "well," "not well," and "not at all." The data displayed in Table 3.8-4 were derived from the Census block groups within the study area, the lowest aggregated statistical level for which this information is publicly available.

Otady Area EET 1 optilations								
	Spanish		European		Asian		Other ^a	
	Number	Percent of Study Area	Number	Percent of Study Area	Number	Percent of Study Area	Number	Percent of Study Area
Speak English "Very Well"	3,295	49.4	2,673	69.5	4,532	36.0	3,074	42.0
Speak English "Well"	1,232	18.5	557	14.5	4,305	34.2	2,581	35.3
Speak English "Not Well"	1,394	20.9	571	14.8	2,722	22.0	1,359	18.6
Speak English "Not At All"	728	11.2	45	1.2	972	7.7	301	4.1
Total	6,649	100	3,846	100	12,531	100	7,315	100

Table 3.8-4 English Language Proficiency by Population 5 Years and Over of Study Area LEP Populations

Among households, the 2000 Census data indicate that 4,876 households within the study area Census block groups are categorized as linguistically isolated or speak English as a second language. The data suggest that 36.1 percent (1,758) of those households primarily are Asian or Pacific language-speaking households, 33.3 percent (1,624) are households that speak some other type of language not categorized by the Census, and 19.7 percent (960) are primarily Spanish-speaking households. Other Indo-European language-speaking households account for 11 percent of the study area, or 534 households.

Non-English speaking households were analyzed with other environmental justice characteristics, and thematic mapping analysis suggests a strong relationship between household income and English proficiency (non-English speaking households are predominantly located in Census block groups where median incomes are typically lower than other block groups in the study area). In these identified areas, special efforts were taken during the Central Corridor LRT planning and preliminary engineering process to engage potentially underrepresented community members, particularly those for whom English may not be their first language. These efforts are detailed in Chapter 11.

Households without Vehicles

The availability of a personal vehicle is strongly correlated with the amount of trips taken and distance traveled. Data from the National Household Travel Survey indicate that persons in households without a vehicle took approximately 1,000 trips in 2001, as compared to households with at least 1 vehicle, which averaged 1,500 person trips for the same year. Households without vehicles made 37 percent of their total trips by foot and 20 percent by some mode of transit service. A strong relationship between household income and vehicle ownership is also observed (USDOT, Bureau of Transportation Statistics and the Federal Highway Administration, 2001 National Household Travel Survey, January 2003).

According to 2000 Census data for the study area, within one-half mile of the proposed LRT alignment, approximately 15,502 households are without an automobile, or approximately 31 percent of all households in the study area. The data suggest that approximately 21,238

Source: U.S. Census Bureau, Census 2000 Summary File 3 (SF 3), 2001.

^a The U.S. Census specifies that "Other" languages include Uralic languages, such as Hungarian; the Semitic languages, such as Arabic and Hebrew; languages of Africa; native North American languages, including the American Indian and Alaska native languages; and some languages of Central and South America.

households (43 percent) have at least one vehicle, and 9,464 households (19 percent) have at least two vehicles. Despite the majority of households within the study area having access to at least one vehicle, thematic mapping indicates that the majority of no-vehicle households are clustered around the downtown areas of Minneapolis and St. Paul. Furthermore, a relationship is established between the Census block groups with the lowest median household incomes and the highest proportion of no vehicle households. Table 3.8-5 provides an analysis of no-vehicle households for the study area compared with no-vehicle households in Hennepin and Ramsey Counties and the Cities of Minneapolis and St. Paul. As evidenced, the proportion of households without a vehicle in the Central Corridor study area is significantly higher than in either the cities or the counties.

Percentage No Vehicle Area No Vehicle Households Households Hennepin County 48,930 11 Ramsey County 23,666 12 Minneapolis 31.991 20 St. Paul 18,866 16 Study Area 15.502 31

Table 3.8-5 No Vehicle Households

Source: U.S. Census Bureau, Census 2000 Summary File 3 (SF 3), 2001.

3.8.5 Conclusions Regarding the Presence of Protected Populations

3.8.5.1 Minority Populations

As summarized in Table 3.8-1, the Central Corridor area generally has higher percentages of minority populations than do the broader Hennepin and Ramsey county areas. As indicated in Figure 3.8-1, predominantly minority areas in the Central Corridor are clustered in the following areas:

- The University/Prospect Park segment of the corridor, specifically in the Cedar-Riverside area of Minneapolis.
- The Midway East corridor segment between Rice Street and Lexington Parkway.
- The Capitol Area corridor segment, most notably near I-35E, which includes the Mt. Airy Homes public housing complex.

3.8.5.2 Low Income Populations

As summarized in Table 3.8-2, the Central Corridor area generally has higher percentages of low-income persons (defined as persons living in poverty according to Department of Health and Human Services guidelines), than do the broader Hennepin and Ramsey county areas. As indicated in Figure 3.8-3, low-income populations are clustered in the following locations:

- The University/Prospect Park segment of the corridor, specifically in the Cedar-Riverside area of Minneapolis.
- The Midway East corridor segment and most especially on the south side of University Avenue between Hamline Avenue and Lexington Parkway, and then between Lexington Parkway and Rice Street.

• The Capitol Area corridor segment and most especially in the area near I-35E, which includes the Mt. Airy Homes public housing complex.

For the purposes of the analysis which follows, the communities identified above as having concentrations of minority and low-income populations were used to identify potential disproportionately high and adverse impacts of the Central Corridor LRT project.

3.8.6 Long-Term Effects

This section describes the long-term effects of the No Build Alternative and the Preferred Alternative on environmental justice issues. As described in Chapter 11, Public and Agency Coordination and Comments, extensive public information and outreach activities were conducted as part of the AA/DEIS and SDEIS process for the Central Corridor LRT project to inform area residents and businesses about the project and provide an opportunity for public comment. These informational and outreach activities, coupled with the public hearings and comment periods, have allowed the public to provide input on the proposed alignment and alternatives, station locations, environmental issues, future development implications, the project planning process, and the selection of the Preferred Alternative. This input has resulted in concurrent planning processes undertaken by the City of St. Paul in the development of the Central Corridor Development Strategy (Urban Strategies, October 2007). This planning process addresses many of the issues and concerns raised by adjacent neighborhoods (see Section 3.1). Additionally, this input influenced the Central Corridor LRT project by assisting in the identification of future stations that will reduce station spacing and create economic opportunities.

3.8.6.1 Adverse Effects to Protected Populations

For the purpose of this analysis, adverse effects are defined as major transportation, social, economic, environmental, or human health effects anticipated to result from the Preferred Alternative which exceeded an established federal or state standard. Adverse impacts associated with a project for which no federal or state standards exist encompass a broad range of potential effects, including traffic, parking, transit accessibility, community cohesion, acquisitions and displacements, along with other effects. For some potential adverse effects, such as traffic, long-standing engineering practice and methodologies exist to quantify impacts and their relative level of adversity. For instance, traffic impacts have graded levels of service from "A" through "F." Other potential adverse effects are qualitative in nature, such as community cohesion. A discussion of these effects is also included.

No-Build Alternative

The No-Build Alternative, as described in Chapter 2, includes roadway and bus system improvements along University Avenue and I-94 as specified in the appropriate agency Transportation Improvement Programs (TIP) and 2030 Transportation Policy Plan for which funding has been committed. The current transportation and transit facilities and services, with minimal modifications or expansions, form the basis of the No-Build Alternative. From this analysis, the No-Build Alternative would not cause adverse or disproportionate impacts to the human or environmental health of minority, low-income, or special populations in the Central Corridor. The No-Build Alternative would not lead to major public infrastructure investments and improvements, and development throughout the corridor would continue at the current pace. Mobility benefits that would accrue with changes proposed to the Preferred Alternative would not be realized under the No-Build Alternative.

Preferred Alternative

The project would result in significant capital and economic investments throughout the Central Corridor Study Area, along with major transportation access and mobility improvements for area residents. The Preferred Alternative represents a substantial long-term capital investment in transit in an area with higher-than-average transit dependent populations. Increased transit access to employment and activity centers would benefit all area populations, regardless of socioeconomic status. Minority and low-income communities would not disproportionately experience any high or adverse impacts associated with implementation of the Preferred Alternative except under the transit accessibility criteria, and the entire study area would benefit from this significant public infrastructure investment.

Table 3.8-6 provides a comparison of impacts relative to their location within the corridor and their potential impact to environmental justice communities.

Resource	No Build Alternative	Preferred Alternative	Environmental Justice Communities
Air Quality	No Change to Existing Conditions	Modest Improvements to Air Quality are Expected	Modest Improvements to Air Quality are Expected
Noise	No Change to Existing Conditions	No severe noise impacts - mitigated condition	No severe noise impacts
Vibration	No Change to Existing Conditions	15 structures are adversely effected	5 structures are adversely impacted
Traffic	No Change to Existing Conditions	14 intersections are forecast to operate below LOS D during p.m. peak in 2030	3 intersections are projected to move from LOS D to E or F ratings with implementation of the Preferred Alternative
Parking	No Change to Existing Conditions	Loss of 975 on-street parking spaces	Loss of 339 on-street parking spaces
Transit Accessibility	No Change to Existing Conditions	Overall improvement in transit service	3 Census blocks would experience a decrease in overall transit service
Community Cohesion	No Change to Existing Conditions	No Change to Existing Conditions	No Change to Existing Conditions
Acquisitions and Displacements	No Change to Existing Conditions	Property acquisitions and building removal in downtown St. Paul	No acquisitions or displacements required
Placement of System Components	No Change to Existing Conditions	13 Traction Power Substations Located Along the Corridor	5 Traction Power Substations

Table 3.8-6 Comparison of Effects to Protected Populations

A discussion of these impacts relating to the entire corridor population and identified environmental justice communities is provided below:

Air Quality – Both Hennepin and Ramsey Counties have been designated as maintenance areas for CO and SO₂ by EPA. The air quality data from the monitoring locations nearest the Central Corridor LRT Study Area, including the Preferred Alternative indicate compliance with Minnesota and NAAQS. The Preferred Alternative is included in the current air quality

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conformity determination, and therefore, no project-specific regional analysis is required under Transportation Conformity rules. The Preferred Alternative is not anticipated to result in any adverse or long-term air quality impacts to protected populations. A discussion of impacts to air quality is provided in FEIS Section 4.5.

Noise – Initial results of the noise analysis indicated that 11 severe noise impacts were anticipated in the environmental justice community between Rice Street and Lexington Avenue as a result of the Preferred Alternative's implementation and operation. These impacts were the result of a trackway crossover's placement on University Avenue between Grotto and Avon Streets. However, working with neighborhood residents and area businesses, along with project engineers, the crossover was moved out of this area. Therefore, no severe noise impacts resulting from the project's operation are anticipated. Environmental justice communities are not anticipated to experience any disproportionate or adverse noise impacts as a result of the Preferred Alternative's operation.

Vibration – Potential LRT-induced vibrations were assessed for three different land use categories using FTA's General and Detailed Vibration Assessment methods (FTA, 2006) for the entire CCLRT corridor. Vibration impacts are based on categories of land use. Residential land uses are Category 2 and institutional land uses (which include commercial land uses) are Category 3. Results of the analysis determined that 2 Category 2 vibration impacts and 3 Category 3 vibration impacts in the environmental justice community between Rice Street and Lexington Avenue. Specifically, these impacts were determined between North Grotto and Victoria Streets and attributable to trackway crossovers. As a vibration mitigation measure, Metropolitan Council commits to the relocation of crossovers that were originally proposed to be installed in the EJ neighborhoods. As a result of the relocation commitment, vibration impacts are no longer predicted to occur in the EJ neighborhoods. Results of the vibration analysis and mitigation commitments are provided in Section 4.7.

Traffic – Quantifying adverse effects to traffic resulting from a proposed project is typically done by reporting impacts in terms of levels of service, "A" through "F." Much like grades received in school, "A" indicates the best operations possible, while "F" indicates an intersection that is failing. In urban areas such as the Twin Cities, level of service "D" is understood to indicate an acceptable level of service and level of service "E" indicates an intersection that is approaching its capacity. Level of service "F" indicates an intersection that is operating beyond capacity, or, from a driver's perspective, an intersection where he or she would wait through at least one green cycle before moving through the intersection.

As described more fully in Chapter 6.0 of the FEIS, a total of 14 intersections would be expected to operate at LOS "E" or "F" in the future (2030) as a result of Central Corridor LRT operating. Of these intersections, three are found in the areas identified as having concentrations of environmental justice populations.

- University Avenue and Hamline Avenue: Under existing conditions, this intersection is currently operating at level of service "D" in the p.m. peak hour. In 2014 when Central Corridor LRT begins operating, it is anticipated to continue to operate at level of service "D" and by 2030 it is anticipated to operate at level of service "E" or close to capacity.
- University Avenue and Lexington Parkway: Under existing conditions, this intersection
 is currently operating very close to capacity, at level of service "E" during the p.m. peak
 hour. It is anticipated to operate at level of service "F" in the p.m. peak in 2014, with
 Central Corridor LRT operating.

 University Avenue and Marion Street: This intersection currently operates at level of service "B" in the p.m. peak hour and is anticipated to operate at level of service "D" which is an acceptable level of service in 2014 when Central Corridor LRT begins operations and at level of service "E" or close to capacity in the year 2030.

The traffic model used to make future assumptions regarding traffic levels of service did presume that mitigations to optimize signal timing were in place as part of forecasting future levels of service. Further mitigation is not being identified as part of the Preferred Alternative. A full discussion of traffic mitigation is found in Section 6.2 of the FEIS.

As discussed above, traffic levels of service are quantified and reported in terms of levels of service, whether for intersections or segments of roadways. However, transportation systems are part of a broader pattern of land use and development opportunities. Traffic improvements, particularly those adding capacity and requiring ROW takings, must be considered in this broader context. The communities adjacent to the Central Corridor have expressed concern about the acquisition of properties, residences, and businesses and the disruption this would cause (see discussion under community cohesion and acquisitions and displacement, below). Improvements required to provide optimal traffic LOS, particularly at the intersection of Lexington Parkway and University Avenue, (the only intersection in the environmental justice community anticipated to operate at LOS E or F during the PM peak periods in 2030), would require capacity improvements including the acquisition of ROW and demolition of existing minority-owned businesses. It is important to note that the failing LOS anticipated at the intersection of Lexington Parkway and University Avenue will not result in other associated negative environmental impacts, such as deteriorating air quality standards.

Although two intersections are anticipated to be operating near capacity in the future (University Avenue and Hamline Avenue, and Marion Street and University Avenue) and one intersection is anticipated to operate over capacity (Lexington Parkway and University Avenue), the adverse impacts associated with providing improved levels of service (requiring ROW and property acquisition) outweigh the benefits of improved traffic flow. The offsetting benefits of increased transit service with the Central Corridor LRT project (as discussed in Section 6.1) are anticipated to address some impacts associated with deteriorating traffic LOS resulting from the Preferred Alternative.

Although increasing overall capacity at intersections with deteriorated LOS is not being considered because of severe ROW impacts, other mitigation strategies are being implemented along the entire corridor to minimize traffic impacts at failing or near-failing intersections (Section 6.2). These strategies include the following:

- Optimization of signal timing splits
- Integration into the coordinated traffic signal systems
- Protected left- and right-turn lanes
- Expansion of turn lanes and/or extension of turning bay lengths.
- New signal phasing on some of the University Avenue cross-streets.

Traffic impacts have been identified at intersections located throughout the corridor. As shown in Table 3.8-6, the impacts are not disproportionately borne by environmental justice neighborhoods. Only three of the 14 intersections anticipated to have LOS D through F with implementation of the Preferred Alternative are located within the environmental justice neighborhoods. Additionally, mitigation strategies and improvements are equitably distributed to these intersections. Therefore, no adverse traffic impacts predominantly borne by minority and/or low-income populations are anticipated.

Parking – Construction of the Preferred Alternative would result in the loss of on-street parking along University Avenue. A detailed discussion of this issue can be found in Section 6.3 of the FEIS.

Overall, 85 percent of on-street parking spaces (975 out of 1,150) will be eliminated due to the Central Corridor LRT project along University Avenue in St. Paul. In the identified environmental justice community between Rice Street and Lexington Parkway, 76 percent of the on-street parking spaces (339 out of 444) will be eliminated. This represents a 30 percent net loss of the on-street parking spaces within the entire corridor. In addition to reviewing aggregate parking loss, the analysis of on-street parking conducted as part of preliminary engineering for the project considered individual businesses in effort to determine impacts based on the availability of off-street parking. Four "hot-spot" areas along University Avenue were identified where mitigation of parking loss would be required. One of these four hot spot areas was located in the environmental justice community between Rice Street and Lexington Parkway, specifically on the northwest corner of Dale Street and University Avenue. Mitigation strategies for the loss of on-street parking have been identified and are summarized in Section 6.3 of the FEIS. There will be no on-street parking lost in the environmental justice community in the Cedar-Riverside area of Minneapolis.

Although there will be on-street parking loss as a result of the Central Corridor LRT project, there will be proportionately less parking lost in the environmental justice areas of the corridor. A further analysis of potential adverse impacts specific to individual business needs identified four areas along the corridor requiring further study and/or mitigation. One of these areas is found in the environmental justice area between Rice Street and Lexington Parkway, at the northwest corner of Dale Street and University Avenue. Since proportionately less parking will be lost in the environmental justice area and since proportionately fewer areas of concern were identified there, no adverse parking impacts predominantly borne by minority and/or low-income populations are anticipated.

There will be no on-street parking lost in the environmental justice community in the Cedar-Riverside area of Minneapolis.

Transit Accessibility – As summarized in Section 3.8.4 above, the Central Corridor project area is highly transit dependent, with approximately 31 percent of all households not having an automobile (Census 2000). As such, the community depends on regular and reliable transit service to meet mobility needs, as expressed in the Purpose and Need statement for the project. During public comment periods and community forums for both the AA/DEIS and the SDEIS, community members expressed concerns regarding planned changes in frequency to the Route 16 bus operating on University Avenue. In addition to changes in service frequency, residents, businesses, and neighborhood organizations have also expressed concerns regarding the spacing of stations, particularly for residents between Rice Street and Lexington Parkway in St. Paul.

In addressing these concerns, the SDEIS examined the social, economic, and environmental impacts of constructing three additional stations at Hamline Avenue, Victoria Street, and Western Avenue in the City of St. Paul. Analysis of the impacts to ridership on the Central Corridor LRT were conducted as part of the analysis. The analysis determined that the addition of these stations would not result in ridership gains, but rather a loss of overall ridership due mostly to the increase in overall travel time. This analysis report is provided in Appendix J of the FEIS. In response to community concerns, the Metropolitan Council has committed funding as part of the Preferred Alternative for the construction of the below-ground infrastructure for these future infill stations to be constructed once funding is identified. The Metropolitan Council intends to construct these stations, which will allow enhanced access to

the surrounding neighborhoods and community. The methodology for this analysis was consistent with the guidelines of the FTA Circular and is also consistent with analysis of service change impacts routinely completed by the Metropolitan Council when changes in transit service are proposed.

In response to community concerns regarding disproportionate impacts from the operation of the Central Corridor LRT, station spacing, and service reduction of the Route 16 bus, the Metropolitan Council completed a detailed Title VI Review (*Central Corridor Title VI Review, 2008*), consistent with FTA Circular 4702.1A guidance issued on May 14, 2007, of the impacts resulting from the proposed changes in transit service. The analysis was conducted using available Census data at the block and block group levels. The analysis determined that construction and operation of the project would lead to increased access to transit services for most of the Census blocks within the identified environmental justice communities. However, 10 Census blocks in the Central Corridor would experience a decrease in transit access. Three of these blocks are located in the identified environmental justice region, located along Western Avenue north and south of University Avenue. This decrease in service is considered an adverse impact that would be disproportionately borne by the identified environmental justice populations. The complete Title VI Review with graphic representations of the Census blocks in question is provided in Appendix I.

Methods for Analyzing Proposed Service Changes

The geographic extent for analyzing proposed service changes was limited to a one-half mile buffer around the Central Corridor. Census data was used to identify low-income and minority populations at the smallest unit for which data is available – the block level for minority status and the block group level for income. A one-half mile buffer was used around LRT stations as the standard for estimating walking distance access. Examination of peer agencies' rail experiences suggested use of a one-half mile standard and this standard was also suggested by FTA.

Results of Analysis of Service Changes

Low-Income Populations: Results of the Title VI transit service change analysis indicated that transit access will increase for all census block groups within the Central Corridor area of analysis.

Minority Populations: Results of the Title VI transit service change analysis indicated that almost all census blocks in the Central Corridor will have an increase in transit service and capacity. However, three census blocks in the Midway East planning segment, a region predominantly comprised of minority residents are anticipated to experience a decrease in transit service. These three census blocks are located along Western Avenue north and south of University Avenue within the environmental justice community identified for minority populations.

Community Cohesion - Following the publication of the AA/DEIS, numerous public comments were received concerning access and mobility within and particularly across the corridor, with particular concerns raised about the possibility of the LRT creating a physical barrier between neighborhoods on either side of University Avenue. Concerns regarding community cohesion are brought into sharper relief by a sensitive understanding of the history of what was known as the Rondo neighborhood and which encompassed the environmental justice community between Lexington Parkway and Rice Street. The Rondo community, a historically African-American community, was devastated with the construction of Interstate Highway 94 in St. Paul during the 1960s. The stakeholders that are engaged in the planning for the Central Corridor LRT remain committed to ensuring such disproportionate impacts are not borne again by this community.

As part of responding to community concerns about community cohesion, expressed during the AA/DEIS comment period and at other forums for public input to the project, there were a number of accommodations added to the project during preliminary engineering to enhance community cohesion. These included providing for non-signalized pedestrian crossings of University Avenue to ensure that pedestrians will be able to cross University Avenue at virtually every legal crossing that currently exists. A depiction of a typical non-signalized pedestrian crossing and a description of how it would work are included in Section 6.3 of this FEIS.

Not all existing intersections of University Avenue will be provided non-signalized pedestrian crossings. Intersections where these accommodations are not provided are typically three-legged or offset intersections. In all instances, where a non-signalized pedestrian crossing is not being installed, a legal pedestrian crossing is possible within one block. Additionally, the intersections that would not be outfitted with non-signalized pedestrian crossings are intersections that currently do not permit pedestrian crossings. The following intersections currently do not allow pedestrian crossings, and pedestrian crossings will not be permitted with implementation of the Central Corridor LRT:

- Arthur Ave. SE and University Avenue
- 30th Avenue SE and University Avenue
- Clarence Avenue and University Avenue
- Pillsbury Street and University Avenue
- Montgomery Street and University Avenue
- W. Lynnhurst Avenue and University Avenue
- Beacon Street and University Avenue
- Herschel Street and University Avenue
- Pierce Street and University Avenue
- Asbury Street and University Avenue
- Virginia Avenue and University Avenue
- Galtier Street and University Avenue
- Capitol Boulevard and University Avenue
- Rev. Martin Luther King Jr. Boulevard and Robert Street
- Wacouta Street and 4th Street

Out of 15 intersections that will not accommodate pedestrian crossings in the future, the Virginia Avenue and Galtier Street intersections with University Avenue are located within the environmental justice community area between Rice Street and Lexington Avenue. In the case of the Virginia Avenue intersection, a non-signalized crossing is not being installed in order to accommodate the future infill station that will be constructed at Western Avenue. At Galtier Street, a non-signalized pedestrian crossing is not being provided as this is an offset intersection and a pedestrian crossing of University Avenue is available at Marion Street, approximately 200-feet to the east.

With the addition of non-signalized pedestrian crossings, the reconstruction of sidewalks along University Avenue and associated streetscaping elements, impacts to community cohesion

are not anticipated with construction and operation of the Preferred Alternative. Since no adverse impacts are anticipated to community cohesion, there is no potential for impacts to be disproportionately borne by environmental justice populations.

Acquisitions and Displacements - Concerns regarding the acquisition and displacement of businesses and residences as part of the Central Corridor LRT project were expressed frequently by members of the community. The AA/DEIS indicated that approximately 53 land parcels would need to be partially acquired in the environmental justice community between Hamline Avenue and Rice Street. The AA/DEIS determined that no residential or business buildings would need to be acquired. As part of project refinements during preliminary engineering, no residential or business acquisitions are required as a result of the Preferred Alternative in the environmental justice community area; therefore no adverse impacts are anticipated. Since no adverse impacts are anticipated, there is no potential for impacts to be disproportionately borne by environmental justice populations.

Placement of System Components - Concerns were expressed during the SDEIS comment period regarding the placement of traction power substations (TPSS) needed to provide power to the LRT and whether the placement of these resulted in disproportionate impacts to environmental justice populations. There are a total of 12 traction power substations that will be required as part of operating the Central Corridor LRT. Of these, five will be located in the environmental justice communities located along the corridor (one TPSS in the Cedar-Riverside area and four located in the Midway East corridor segment). The location of the TPSS in the Capitol Area segment is not located in an environmental justice neighborhood.

Concerns were expressed during public outreach and comment periods regarding the spacing of traction power substations, particularly in the environmental justice community between Rice Street and Lexington Parkway. Traction power substations are spaced based on several considerations but are generally more closely spaced as more power is required for train operations, an example being when trains must negotiate grade changes.

Along the Central Corridor, traction power substations are, on average, placed approximately 5,000 feet apart. It was noted that the substations in the environmental justice community between Rice Street and Lexington Avenue are more closely spaced. This observation is accurate – the distance from the substation located near Victoria Street to the substation located near Dale Street is approximately 4,000 feet and the distance from the substation located near Dale Street to the substation located near Western Avenue is approximately 3,000 feet. However, the reason for placing the substation near Western Avenue is to accommodate the future infill stations at Victoria Street and Western Avenue. A focus of the SDEIS prepared for the Central Corridor LRT project was to assess the environmental impacts of future infill stations in the environmental justice community and was done in response to comments received during the AA/DEIS comment period. A key policy objective of the Central Corridor Management Committee overseeing the project was to build the Central Corridor LRT to provide all below-ground infrastructure and other system components required in order that these stations can be constructed quickly and efficiently.

The placement of system components is not anticipated to result in any adverse impacts to environmental justice populations. Since no adverse impacts are anticipated, there is no potential for impacts to be disproportionately borne by environmental justice populations.

3.8.7 Offsetting Project Benefits

Construction of the Preferred Alternative is anticipated to produce offsetting project benefits to all communities living adjacent to the Preferred Alternative alignment, impacted by

construction and operation of the line. These benefits include increased transit service, improvements to the existing streetscape environment, and economic benefits.

3.8.7.1 Increased Transit Service

As discussed in Section 6.1, increases in transit service associated with the Preferred Alternative will provide benefits to protected populations living along the corridor. Both minority and low-income populations will see their overall levels of transit service increase by almost half from existing levels. A documented benefit of LRT in the Central Corridor is that it will provide faster, more reliable, more frequent, and higher capacity service for transit riders. In addition, LRT stations will provide safer and more comfortable amenities for passengers waiting to board light rail vehicles than those currently available for bus riders. These amenities include partially enclosed passenger shelters, heating elements, and a station art program that will be reflective of the neighborhood and cultural context within which the LRT station is sited.

3.8.7.2 Improved Streetscape Environment

Construction of the Preferred Alternative will improve the existing pedestrian infrastructure along University Avenue, and improve the safety of pedestrians and bicyclists through implemented design guidelines. The current configuration of University Avenue poses a barrier to pedestrian travel within the corridor. The development of the Preferred Alternative will channel pedestrian movements to crossing locations at intersecting streets, where curb improvements and pedestrian islands within the street will shield pedestrians from both LRT vehicles and automobile traffic. Crossings will still be available throughout the corridor, at both signalized and non-signalized intersections, and the pedestrian channelization is intended to discourage mid-block crossings and improve pedestrian safety. All pedestrian crossings will be designed in accordance with current design standards and ADA requirements to ensure access and mobility for all.

3.8.7.3 Economic Benefits

As defined by the project Purpose and Need statement in Chapter 1, a series of goals and objectives for the corridor were developed, the first of which was to promote economic opportunity and investment. The Preferred Alternative is expected to have positive effects on commercial and residential development. As a result of the project, the surrounding communities would likely see an increase in employment opportunities due to a greater number of commercial and residential businesses along the corridor. This should result in positive economic gains in the form of increased wages and spending. The additional transportation capacity could create competitive advantages for businesses located in the corridor. The City of St. Paul has been engaged in a concurrent planning process for future development along the Preferred Alternative alignment in St. Paul. Adopted as part of the City of St. Paul Comprehensive Plan, Central Corridor Development Strategy seeks to stabilize natural market forces in the neighborhoods adjacent to the Central Corridor and create a set of guidelines for the development, in effort to retain existing businesses located along the corridor. Additionally, the Metropolitan Council's Livable Communities program has allocated up to \$1 million dollars to the City of St. Paul to assist with the purchase of land to be used later for affordable housing near the Preferred Alternative alignment. A description of this program is provided in Section 5.2.

3.8.7.4 Construction Economic Benefits

While it is not the primary intent to benefit the Central Corridor community, the Metropolitan Council's DBE program and the State of Minnesota's workforce goals will provide residual benefits to residents and businesses.

The Metropolitan Council works with a variety of partners on DBE and workforce inclusion efforts. The Council created the Central Corridor LRT DBE and Affirmative Action Joint Committee and the DBE Internal Advisory Committee to support monitoring of compliance and innovation in development of inclusion practices for the Central Corridor LRT project. The Central Corridor LRT DBE and Affirmative Action Committee is comprised of a mix of community advocates and representatives from partner agencies, such as MnDOT, St. Paul, Minneapolis, Ramsey County, Department of Human Rights for Minnesota, and Hennepin County as well as representatives of local business associations such as the Association of Women Contractors, National Association of Minority Contractors, the Black Chamber of Commerce, St. Paul Urban League and the Metropolitan Economic Development Agency. The partners help implement the CCLRT DBE Strategic Plan.

Specific items committed to as part of the Central Corridor LRT DBE Strategic Plan include the following:

- Hold lessons learned workshop with DBE's that participated in the Hiawatha LRT project
- Work with the Central Corridor Project Office in developing DBE requirements for Request for Proposal's (RFP) for the project
- Work with project partners, stakeholders, educational institutes, and nonprofit organizations to provide training opportunities
- Provide training to DBEs
- Provide technical assistance to DBEs and Primes
- Work with appropriate agencies in DBE capacity development

A secondary focus of the joint committee is the implementation of a sound workforce development program that supports training and hiring of residents from the local Central Corridor community.

3.8.8 Short-Term Effects

Construction of the Preferred Alternative would result in several major and minor impacts to adjacent communities. Construction would be phased in order to avoid lengthy impacts to adjacent residents and businesses. Roadway operations and parking, access to businesses, public utility services, pedestrian and bicycle facilities along with short-term impacts to air quality, noise, and vibration are likely to be the most significant impacts experienced by the people and businesses located adjacent to or near the construction zones. These short-term construction effects would not be disproportionately borne by the minority or low-income populations identified along the Central Corridor.

3.8.9 Mitigation

The Preferred Alternative would result in one impact for which the benefits of the project would not offset the impacts. Analysis determined that three Census blocks would experience a decrease in transit service levels as a result of operation of the Preferred Alternative, particularly near Western Avenue in St. Paul. Throughout the public comment periods and

during outreach activities comments have been received regarding the need for increased bus service. .

There is always a need in major construction projects to sensitively address community-expressed needs, some of which can be quantitatively measured but many of which are beyond measure. From this perspective, it should be acknowledged that the perceived need of the community likely would extend beyond the limited areas identified in the Title VI analysis of proposed service changes for the Central Corridor LRT (See Appendix I, Central Corridor Title VI Review).

Mitigation of adverse effects related to decreases in access to transit service will be accomplished through the following action:

• As part of the Central Corridor LRT project, the Metropolitan Council will commit to preparing a targeted transit service plan for the environmental justice community identified in this analysis. This service plan will be based on regional transit service standards and accepted quantitative methods typically used by Metro Transit but will also provide for community input into the process and measures of need as expressed by and as tailored for this transit-dependent community. This plan will be completed at least six months prior to Central Corridor LRT beginning revenue service operations and will be implemented concurrent with the start of LRT service.

3.8.10 Environmental Justice Conclusions

The findings resulting from the environmental justice analysis for minority and low-income populations living within the study area of the Central Corridor LRT are as follows:

- Populations of both minority and low-income persons are present within the Central Corridor LRT area.
- Minority populations are found in the following areas:
- The University/Prospect Park segment of the corridor, specifically in the Cedar-Riverside area of Minneapolis.
- The Midway East corridor segments and most especially between Lexington Parkway and Rice Street.
- Portions of the Capitol Area and most especially in the area near I-35W, which includes the Mt. Airy Homes public housing complex.
- Low-income populations are found in the following areas:
- The University/Prospect Park segment of the corridor, specifically in the Cedar-Riverside area of Minneapolis.
- The Midway East corridor segment and most especially on the south side of University Avenue between Hamline and Lexington and then between Lexington Parkway and Rice Street.
- Portions of the Capitol Area corridor segment and most especially in the area near I-35W, which includes the Mt. Airy Homes public housing complex.

Adverse impacts of the Central Corridor LRT project have been identified. They consist of:

- Traffic LOS at three intersections in the environmental justice areas that will experience levels of service near or over capacity.
- Pascal Street and University Avenue

- Lexington Parkway and University Avenue
- Marion Street and University Avenue
- A decrease in transit service accessibility in some limited blocks in the environmental justice area near Western Avenue in St. Paul.
- Off-setting benefits of the Central Corridor LRT project have been identified.
- Mitigation of adverse effects not offset by identified project benefits is committed to address decreases in access to transit service experienced in isolated areas along the Central Corridor and is anticipated to address this adverse effect.

The required elements for determining of environmental justice impacts as specified within the FTA Title VI Circular have been addressed in this analysis. The Metropolitan Council has committed to mitigating the identified adverse impacts as stated above. The Metropolitan Council has also committed to working toward resolution of community concerns that don't rise to the level of state or federal standards of adverse impacts.