



7 Environmental Justice

This chapter describes the proposed METRO Blue Line Light Rail Transit (BLRT) Extension project's compliance with applicable federal regulations for environmental justice (EJ). This chapter includes the Metropolitan Council's (Council) review of the regulatory context and methodology, identification of minority and/or low-income populations (that is, EJ populations), an overview of public outreach strategies and activities to engage EJ populations in the project planning process, an assessment of impacts that would affect EJ populations, and a project-wide EJ finding.

7.1 Regulatory Context and Methodology

7.1.1 Regulatory Context

The analyses presented in this chapter were prepared in compliance with the Presidential Executive Order (EO) 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* (February 11, 1994); the US Department of Transportation's (USDOT) *Order to Address Environmental Justice in Minority Populations and Low-Income Populations* [USDOT Order 5610.2(a), May 2, 2012]; and the Federal Transit Administration's (FTA) Circular FTA C4703.1, *Environmental Justice Policy Guidance for Federal Transit Administration Recipients* (FTA, 2012).

As outlined in FTA Circular 4703.1, USDOT and FTA are required to make EJ part of their mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of programs, policies, and activities on minority populations and/or low-income populations (collectively, *environmental justice populations*). FTA includes incorporation of EJ and non-discrimination principles into transportation planning and decision-making processes and project-specific environmental reviews.

Furthermore, USDOT Order 5610.2(a) sets forth the USDOT policy to consider EJ principles in all USDOT programs, policies, and activities. It describes how the objectives of EJ are integrated into planning and programming, rulemaking, and policy formulation. This chapter addresses only impacts to minority and low-income populations that would be caused by the proposed BLRT Extension project, because the No-Build Alternative would not directly or indirectly change existing conditions of the surrounding environment.



7.1.2 Methodology for the Environmental Justice Analysis

The framework for the EJ evaluation incorporated in this chapter is based on FTA Circular 4703.1, described above, which outlines a methodology that addresses EO 12898 including both a robust public participation process and an analytical process with three basic steps:

1. Determine whether there are EJ populations potentially affected by the project.
2. If EJ populations are present, consider the potential effects of the project on the EJ population, including any disproportionate high and adverse effects.
3. Determine whether any adverse effects could be avoided, minimized, or mitigated.

7.1.2.1 Environmental Justice Study Area and Data Sources

A geographic information systems (GIS) platform was used by the Council to identify a half-mile buffer¹ around the proposed BLRT Extension project. Year 2010 US Census data were used to quantify minority populations at the block level, the smallest geographic unit for which race and ethnicity data are available. For the analysis of minority populations, each census block that is completely within or intersects the buffer is included in the study area.

American Community Survey (ACS) 2009–2013 data were used by the Council as a primary source for mapping and quantifying low-income populations at the block group level, also the smallest geographic unit for which low-income population data are available. For the analysis of low-income populations, each census block group that intersects or is completely within the half-mile buffer is included in the study area.

7.1.2.2 Method for Identifying Minority and Low-Income Populations

As defined in *FTA Circular 4703.1* (page 6), persons of minority status include those who are:

- American Indian or Alaska Native, which refers to people having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment
- Asian, which refers to people having origins in any of the original peoples of the far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam
- Black or African American, which refers to people having origins in any of the Black racial groups of Africa
- Hispanic or Latino, which includes persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race
- Native Hawaiian or Other Pacific Islander, which refers to people having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands

¹ One half-mile is the industry standard for the maximum distance people prefer when walking to a station. FTA uses one-half-mile catchment areas around transitway stations to measure population and employment in the station areas. Use of the half-mile buffer for this EJ analysis is consistent with corridor demographic measurements throughout the EIS.



As defined in *FTA Circular 4703.1*, a low-income person is one whose median household income is at or below the US Department of Health and Human Services' poverty guidelines.² Poverty levels are defined at the national level and vary by the number of persons in a family and the age of the family members.

In addition to the use of US Census data, the Council further identified the presence of minority and/or low-income populations in the study area identified through an extensive public engagement program as part of the National Environmental Policy Act (NEPA) process; interviews and outreach as part of the *Bottineau Transitway Health Impact Assessment (HIA)* (Hennepin County, 2013); and data analysis, outreach, and research as part of Bottineau Boulevard (County Road 81) station-area pre-planning. See **Section 7.3** for more information on these efforts.

7.1.2.3 Method for Determination of Impacts to Minority and Low-Income Populations

The project-wide EJ finding is based on whether the proposed federal action (the proposed BLRT Extension project) would result in disproportionate and high adverse impacts to EJ populations. Based on FTA guidance, when making the final project-wide EJ finding in this chapter, FTA considered the following criteria:

- Would the proposed BLRT Extension project's adverse impacts be predominantly borne by EJ populations?
- Would adverse impacts to EJ populations be appreciably more severe or greater in magnitude than those suffered by non-EJ populations?
- What would be the effect of the proposed BLRT Extension project's offsetting benefits when considering these impacts?
- What would be the effect of mitigation measures that would be incorporated into the proposed BLRT Extension project and any other enhancements or betterments that would be provided in lieu of mitigation when considering these impacts?

² US Department of Health and Human Services. 2013 Poverty Guidelines. aspe.hhs.gov/poverty/13poverty.cfm.



7.2 Environmental Justice Populations in the Study Area

This section describes the minority and low-income populations identified within the study area, based on the methodology described above.

7.2.1 Minority Populations

The racial composition of the study area, as well as Hennepin County, the Twin Cities Metropolitan Area, and the State of Minnesota, is shown in **Table 7.2-1**. Minorities comprise populations that identify as Latino/Hispanic, Black/African American, Asian, and Other (American Indian, Alaska Native, Native Hawaiian, Other Pacific Islander, Some Other Race, or Two or More Races). The study area has a higher percentage of minority populations (48.4 percent) than the State of Minnesota (16.9 percent), the seven-county Twin Cities Metropolitan Area (23.7 percent), and Hennepin County (28.3 percent). Brooklyn Park is the municipality along the proposed BLRT Extension project corridor with the greatest percentage of minorities (51.0 percent).

Figure 7.2-1 maps the percentage of minority populations in the proposed BLRT Extension project study area by census block. **Figure 7.2-2 through Figure 7.2-5** map the percentage of specific minority groups by census block (Black, Asian, Latino, and other, respectively). As the figures show, the study area contains several neighborhoods with more than half their population comprising minorities, most notably near the proposed Van White Boulevard, Penn Avenue, Plymouth Avenue, 63rd Avenue, and 85th Avenue stations.

The census data are useful for gaining preliminary information about minority communities in the study area; however, community engagement efforts have provided additional information on study area populations. For example, information has been obtained by the Council on specific neighborhoods in the study area comprising recent Somali, Ethiopian, Hmong, and Lao immigrants.



Table 7.2-1. Minority Populations by State, Region, County, and Study Area

Geography		Total Population	Non-Hispanic				Hispanic/Latino (All Races)	All Minority Groups
			White	Black/African American	Asian	Other ¹		
Minnesota	Population	5,303,925	4,405,142	269,141	212,996	166,388	250,258	898,783
	%	100%	83.10%	5.10%	4.00%	3.10%	4.70%	16.90%
Seven-county Twin Cities Metropolitan Area	Population	2,849,567	2,173,218	234,334	182,496	91,961	167,558	676,349
	%	100%	76.30%	8.20%	6.40%	3.20%	5.90%	23.70%
Hennepin County	Population	1,152,425	826,670	134,240	71,535	42,304	77,676	325,755
	%	100.00%	71.70%	11.70%	6.20%	3.70%	6.70%	28.30%
Minneapolis	Population	382,578	230,650	69,971	21,399	20,485	40,073	151,928
	%	100.00%	60.30%	18.30%	5.60%	5.35%	10.45%	39.70%
Golden Valley	Population	20,594	16,897	1,550	872	805	470	3,697
	%	100.00%	82.10%	7.50%	4.20%	3.90%	2.30%	17.90%
Robbinsdale	Population	14,121	10,842	2,082	317	404	476	3,279
	%	100.00%	76.80%	14.70%	2.20%	2.90%	3.40%	23.20%
Crystal	Population	22,361	16,315	2,541	1,109	872	1,524	6,046
	%	100.00%	73.00%	11.35%	4.95%	3.90%	6.80%	27.00%
Brooklyn Park	Population	76,781	37,622	19,274	11,712	3,061	5,112	39,159
	%	100.00%	49.00%	25.10%	15.20%	4.00%	6.70%	51.00%
Study area	Population	63,087	32,539	17,099	5,560	2,870	5,019	30,548
	%	100.00%	51.60%	27.10%	8.80%	4.50%	8.00%	48.40%

Source: US Census Bureau 2011 Decennial Census, Table P9: Hispanic or Latino, and Not Hispanic or Latino by Race

¹ "Other" includes people who identify as American Indian, Alaska Native, Native Hawaiian, Other Pacific Islander, Some Other Race, or Two or More Races.



Figure 7.2-1. Minority Populations in the Study Area

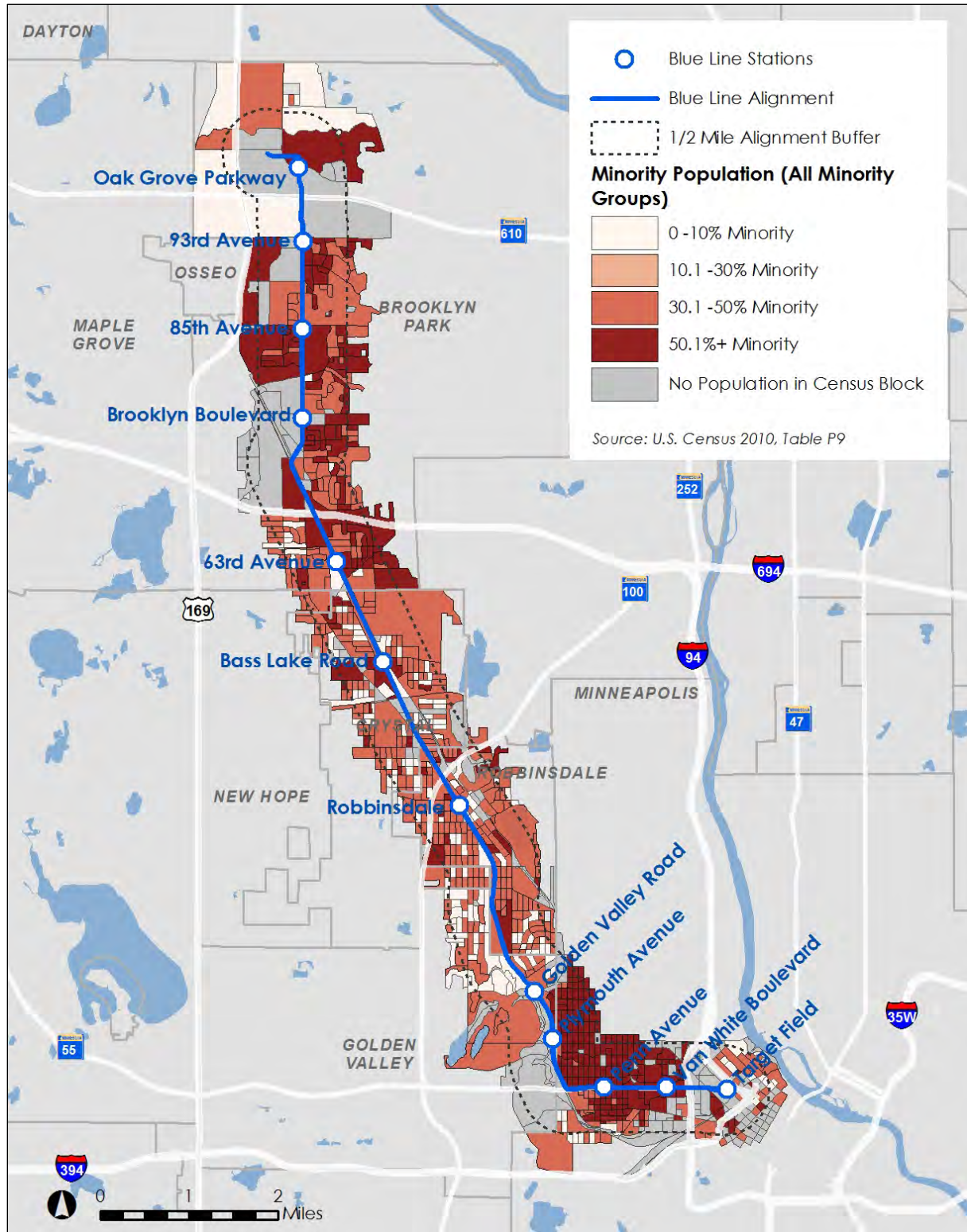


Figure 7.2-2. Black/African American Populations in the Study Area

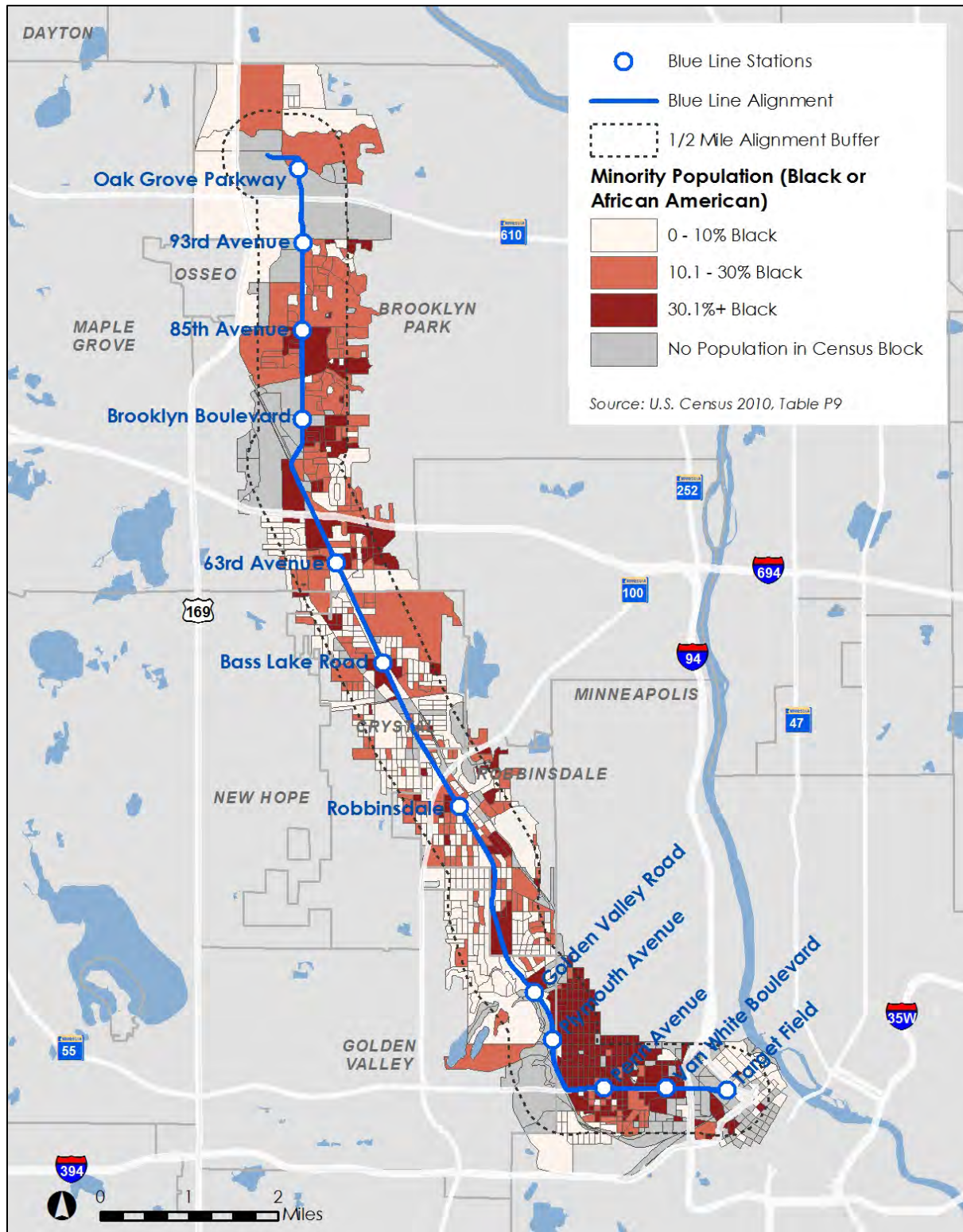




Figure 7.2-3. Asian Populations in the Study Area

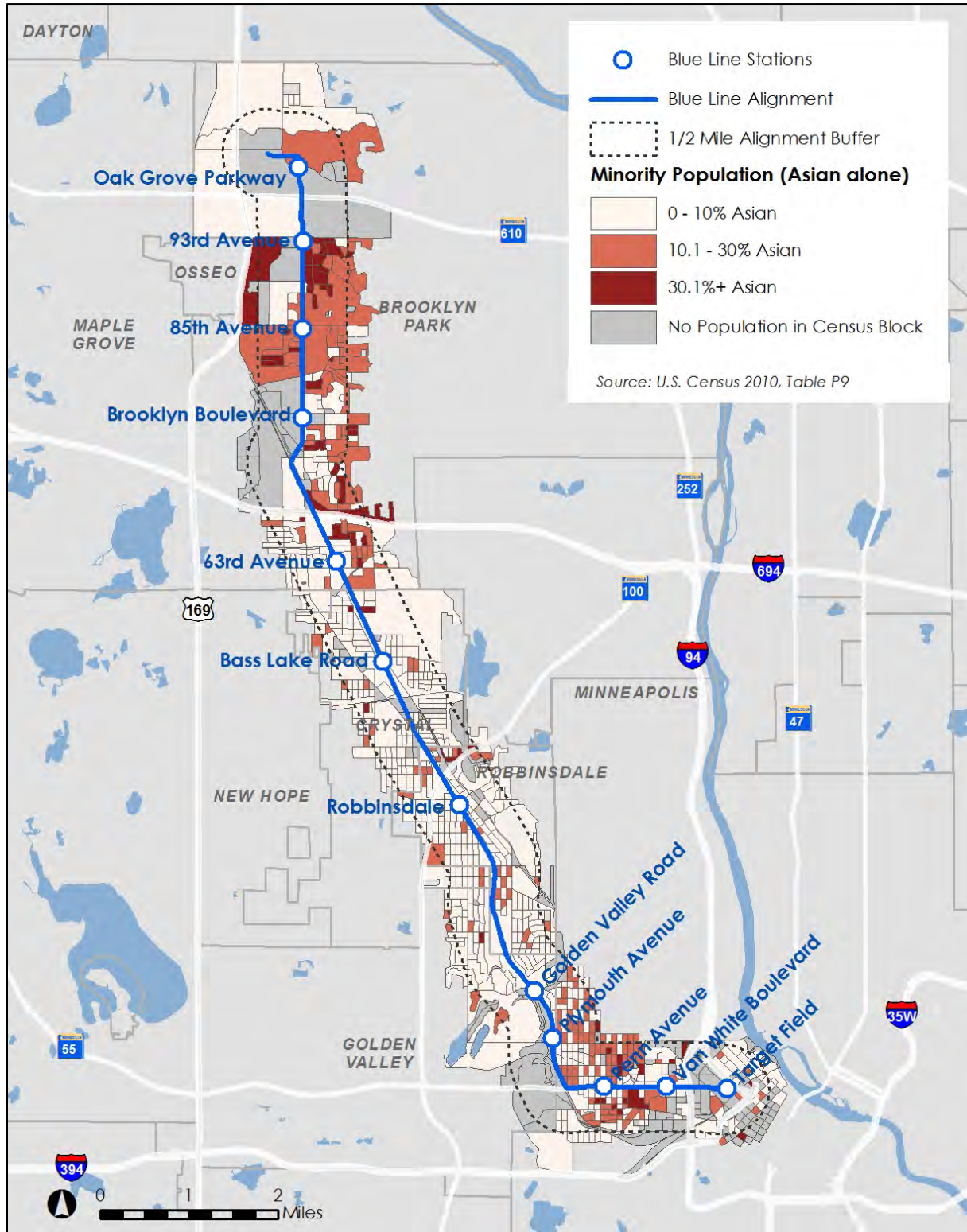




Figure 7.2-4. Hispanic/Latino Populations in the Study Area

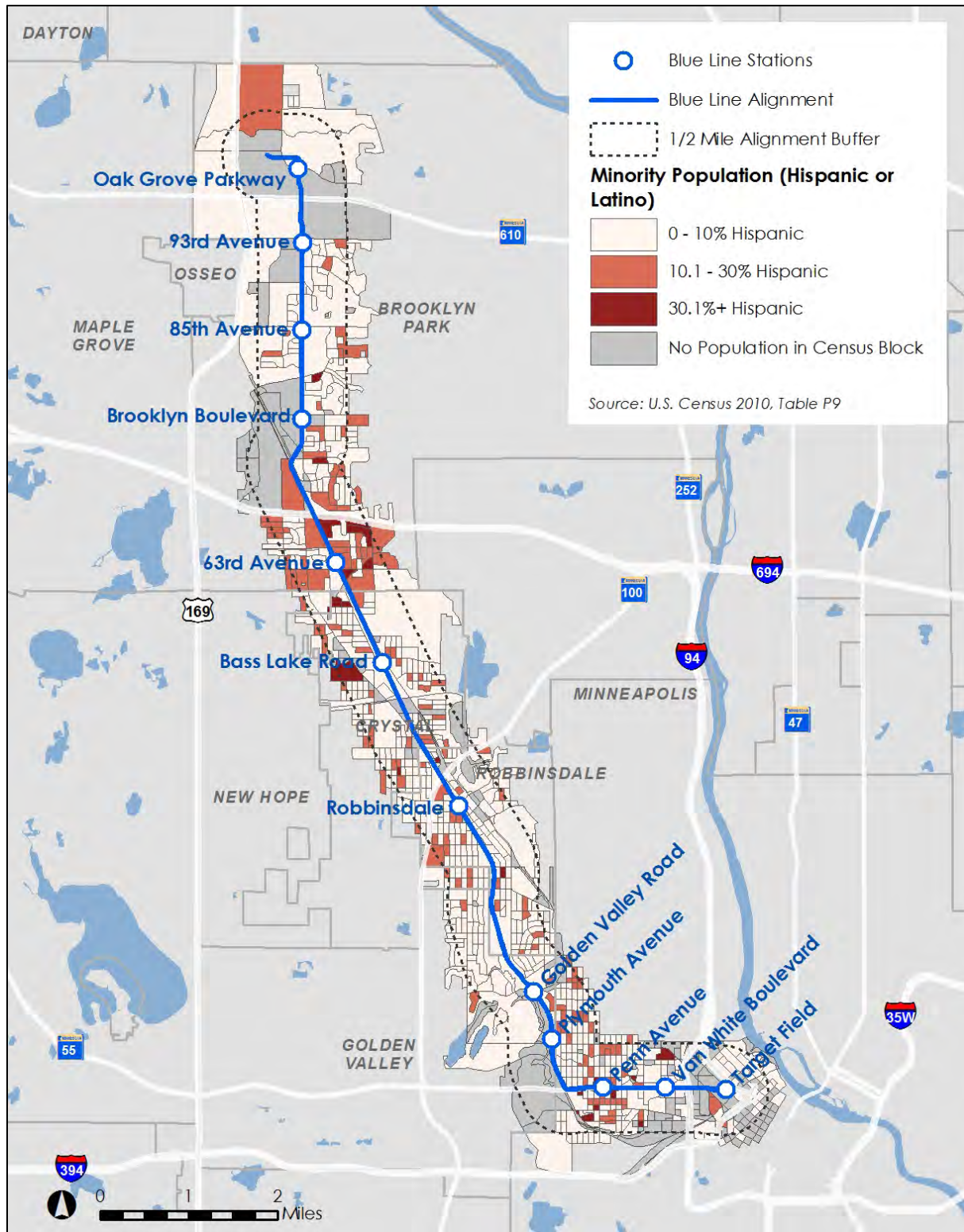
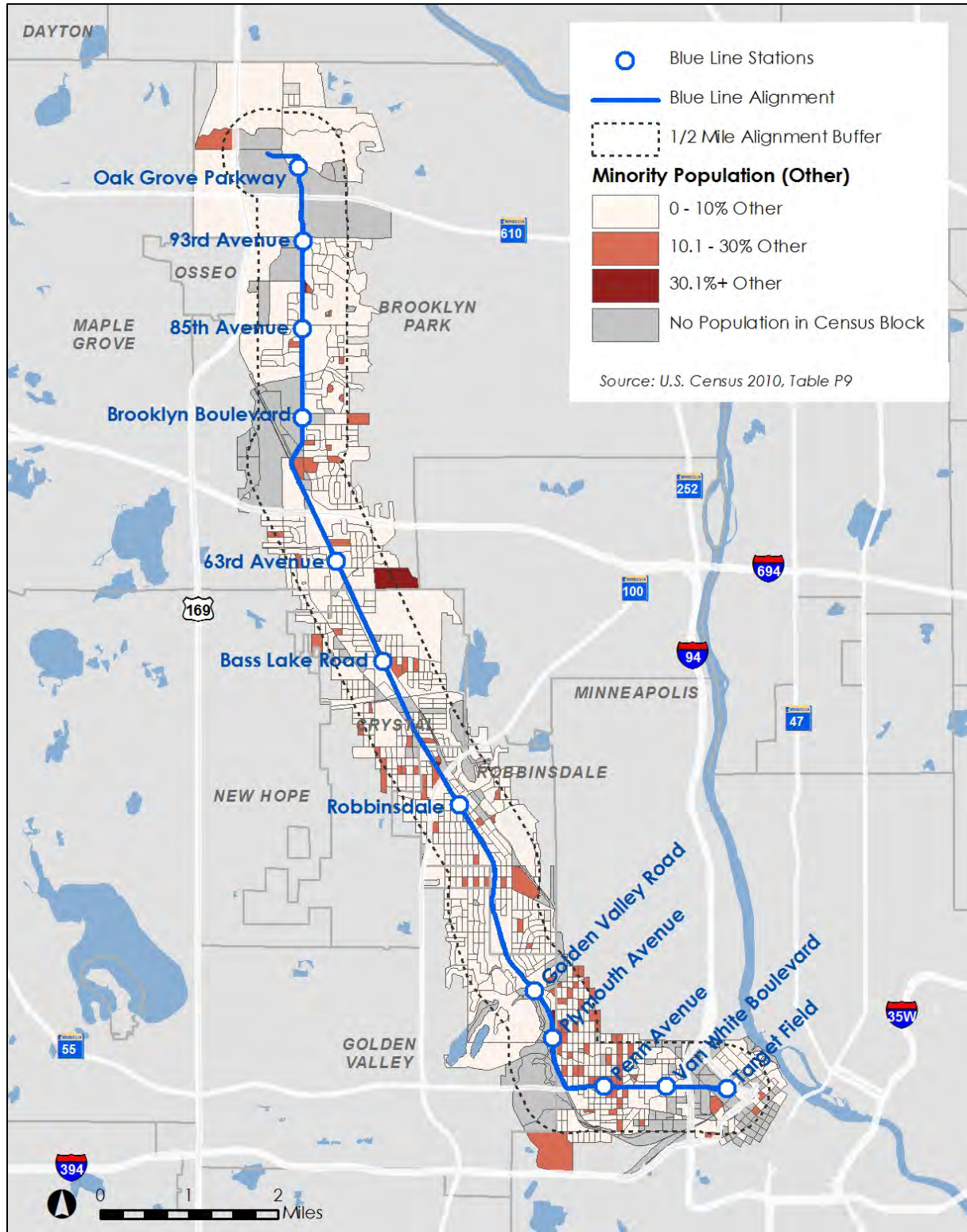




Figure 7.2-5. Other Minority Populations in the Study Area





7.2.2 Low-Income Populations

Table 7.2-2 shows the percentages of low-income individuals (that is, those with household income below the federally established poverty level) in the study area, Hennepin County, the Twin Cities Metropolitan Area, and the State of Minnesota.

According to the Fair Housing equity assessment conducted by the Council in 2014 (*Choice, Place and Opportunity: An Equity Assessment of the Twin Cities Region*; metro council.org/Planning/Projects/Thrive-2040/Choice-Place-and-Opportunity.aspx?source=child) (FHEA) (Council, 2014), poverty in suburban and rural areas has increased by 85 percent since 1990. The racial composition of the residents living in poverty has also changed over the last 20 years. In the most recent data in the report, over half of the region’s residents living in poverty were people of color. Areas of concentrated poverty³ usually suffer from high crime and tend to have schools with lower test scores and graduation rates. These factors have an undermining effect on people’s physical and mental health. Areas of concentrated poverty in the region are shown in **Figure 7.2-6**.

The study area has a higher percentage of low-income populations (18.7 percent) than the State of Minnesota (11.5 percent), the seven-county Twin Cities Metropolitan Area (11.0 percent), and Hennepin County (12.8 percent). Minneapolis is the municipality in the study area with the greatest percentage of low-income populations (22.5 percent).

Table 7.2-2. Low-Income Populations by State, Region, County, and Study Area

Geography	Measure	Total Population	At or above Poverty Level	Low Income (below Poverty Level)
Minnesota	Population	5,223,936	4,625,545	598,391
	%	100%	88.50%	11.50%
Seven-county Twin Cities Metropolitan Area	Population	2,842,338	2,530,403	311,935
	%	100%	89.00%	11.00%
Hennepin County	Population	1,148,765	1,001,939	146,826
	%	100.00%	87.20%	12.80%
Minneapolis	Population	373,744	289,668	84,076
	%	100.00%	77.50%	22.50%
Golden Valley	Population	20,125	18,758	1,367
	%	100.00%	93.20%	6.80%
Robbinsdale	Population	13,996	12,463	1,533
	%	100.00%	89.00%	11.00%
Crystal	Population	22,143	20,196	1,947
	%	100.00%	91.20%	8.80%
Brooklyn Park	Population	76,417	66,990	9,427
	%	100.00%	87.70%	12.30%
Study area	Population	89,075	72,443	16,632
	%	100.00%	81.30%	18.70%

Source: US Census Bureau American Community Survey 2009 –2013 5-Year Estimates, Table C17002: Ratio of Income to Poverty Level in the Past 12 Months (US Census Bureau, 2014)

³ The term *area of concentrated poverty* refers to census tracts where at least 40 percent of residents have a family income below 185 percent of the federal poverty threshold. As context, 185 percent of the poverty level for a typical family of four in 2013 was \$44,093.



Figure 7.2-6. Areas of Concentrated Poverty 2010–2014

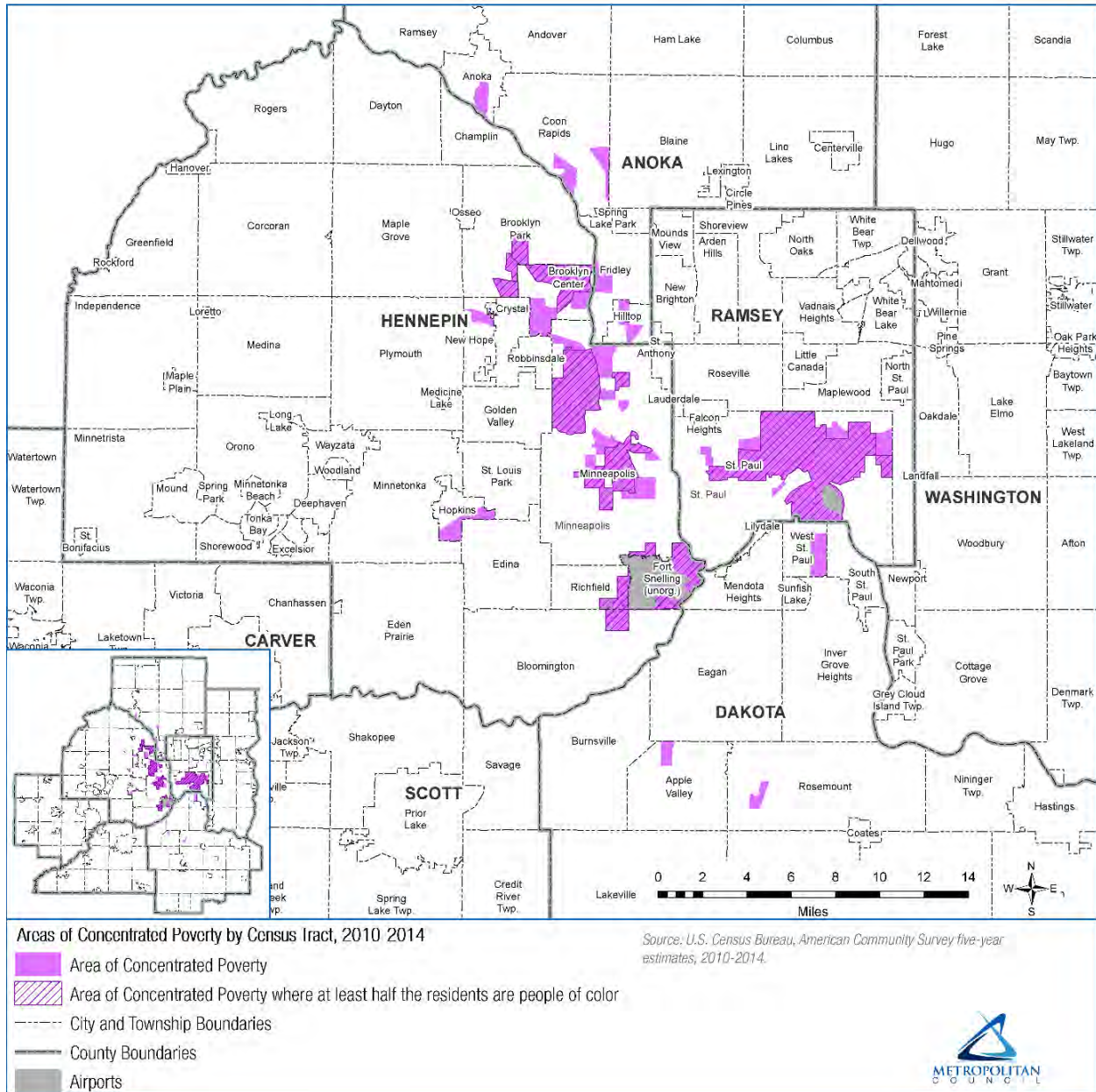
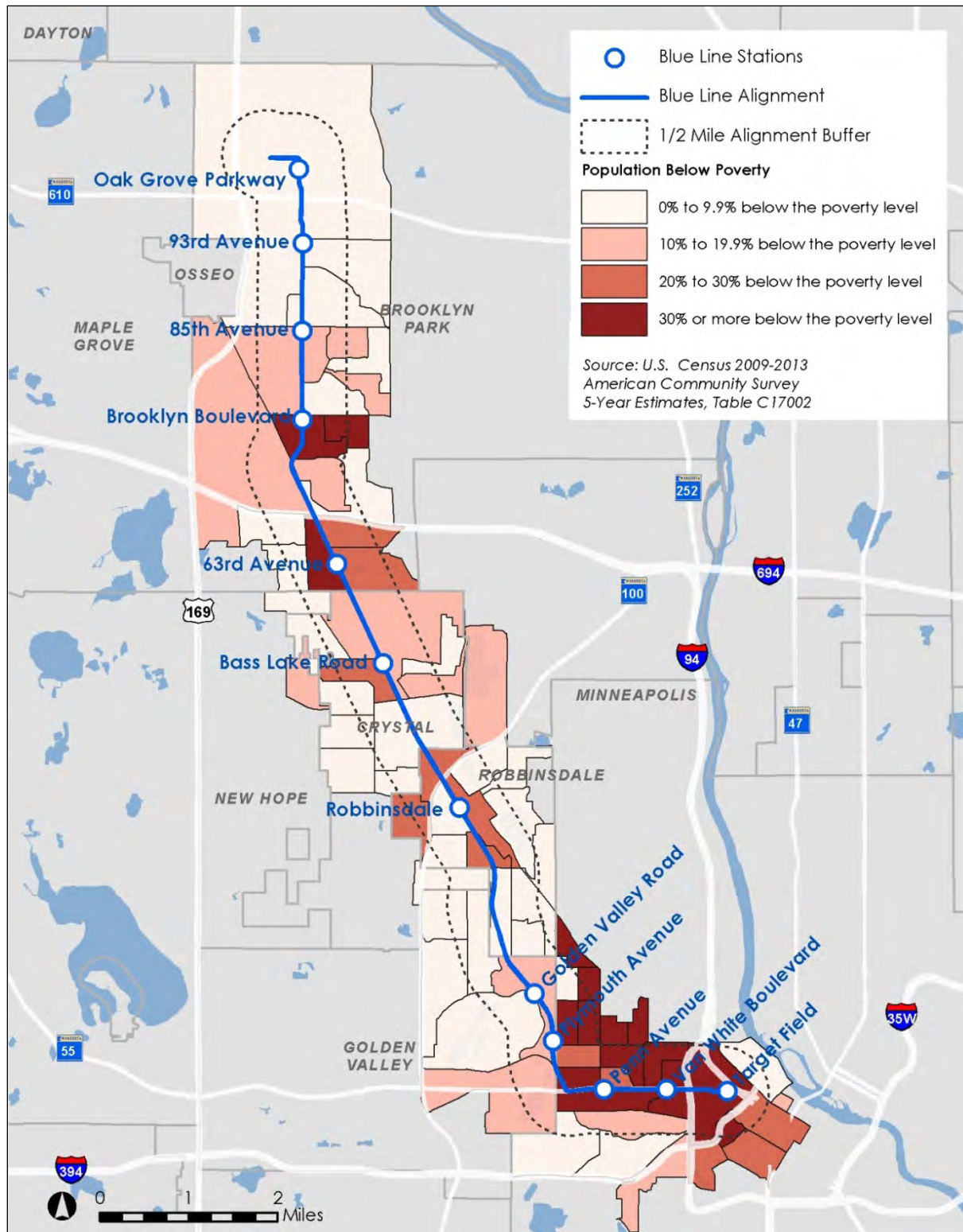


Figure 7.2-7 shows the concentrations of low-income residents in the study area by census tract block group. As the figure shows, low-income populations are located throughout the study area. Areas with more than 30 percent low-income residents include the Van White Boulevard, Penn Avenue, Plymouth Avenue, 63rd Avenue, and Brooklyn Boulevard stations. Through outreach activities described in Section 7.4, lower-income apartment complexes in the study area, even if in an otherwise predominantly higher-income neighborhood, have been identified, engaged in the proposed BLRT Extension project, and considered in the EJ analysis.

Figure 7.2-7. Low-Income Populations in the Study Area





7.3 Public Engagement

While the US Census and ACS are useful tools to help characterize a neighborhood or other geographic region, they are not comprehensive and do not incorporate the communities' views on the composition of their neighborhoods and potential issues of concern. The proposed BLRT Extension project's extensive outreach program has helped to identify communities, neighborhoods, and groups with minority and low-income status outside the purview of census analysis from early in the planning process. **Chapter 9 – Consultation and Coordination** of this Final Environmental Impact Statement (Final EIS) includes a summary of the outreach activities for the proposed BLRT Extension project.

NEPA-phase public involvement has included targeted outreach to EJ communities identified through the census analysis, as well as follow-up communications and outreach to newly identified EJ populations. For the proposed BLRT Extension project, public outreach has been an iterative process, initiated by meetings and events to get to know the communities and include additional organizations, businesses, individuals, and other community groups into the fold as the proposed BLRT Extension project progressed. Initial mapping to identify minority and low-income populations has aided in the identification of neighborhoods within the proposed BLRT Extension project study area that would benefit from enhanced, pro-active, and non-traditional outreach. The sections that follow describe the outreach activities during the Draft Environmental Impact Statement (Draft EIS) and Final EIS phases to identify EJ populations and actively engage them in the proposed BLRT Extension project.

7.3.1 Overview of Early Outreach Activities

During the initial project planning and Draft EIS phase of the proposed BLRT Extension project, in 2011 and 2012, outreach focused on established neighborhood groups, community leaders, and private organizations comprising and connected to low-income and minority communities in the project study area. These efforts included the following:

- **Corridors of Opportunity grantee organizations.**⁴ The Corridors of Opportunity Initiative awarded grants to place-based organizations that work with underrepresented communities to educate and organize communities around transit corridor decision-making, planning, and implementation opportunities important to them. Ten Corridors of Opportunity grantee organizations have engaged minority and low-income populations located in the proposed BLRT Extension project area, including African Career, Education, and Resource, Inc., La Asamblea de Derechos Civiles, Asian Economic Development Association, Asian Media Access, Centro de Trabajadores Unidos en la Lucha, Cleveland Neighborhood Association,

⁴ Corridors of Opportunity is a broad-based initiative to accelerate the build out of a regional transit system for the Twin Cities while advancing economic development and ensuring that people of all incomes and backgrounds share in resulting opportunities. Corridors of Opportunity is funded by a 3-year, \$5-million Sustainable Communities grant from the federal Department of Housing and Urban Development, in partnership with the Department of Transportation and the Environmental Protection Agency. Since grant funds will expire at the end of 2013, the Initiative has created a Community Engagement Steering Committee to evaluate and recommend improvements to existing community engagement structures so that best practices continue beyond the life of Corridors of Opportunity to future transitway projects.



Harrison Neighborhood Association on behalf of the Transit Equity Partnership, Masjid An-Nur, Metropolitan Interfaith Coalition on Affordable Housing, and Northside Residents Redevelopment Council. Chapter 7 of the Bottineau Transitway Draft EIS (March 2014) provides more information on the involvement of these organizations in the proposed BLRT Extension project and the partnership they provided in identifying and engaging EJ populations early in project development.

- **Community Advisory Committee.** The Bottineau Transitway Community Advisory Committee (CAC), comprising residents and key business and institutional representatives from each city, have met for several years to share information and provide input on the proposed BLRT Extension project. Meetings are open to the public and meeting dates, locations, and materials have been available on the website for the proposed BLRT Extension project.
- **Community Events and Meetings.** Project staff has been active participants in project-related events sponsored by several community and neighborhood organizations, including roundtable discussions, panel discussions, project tours, media appearances, and others. Chapter 7 of the *Bottineau Transitway Draft EIS* provides more information on these events.

Project communications were extensive and broad-reaching through the Draft EIS phase, as staff utilized the following methods to disseminate information to the public and project stakeholders:

- The proposed BLRT Extension project's email-based list serve, which had nearly 950 recipients at the time
- Hardcopy newsletters, posters, and flyers to community gathering places along the proposed BLRT Extension project corridor
- Notification of Corridors of Opportunity grantee organizations of all project meetings
- By-request distribution of project informational materials and exhibits
- Distribution of meeting announcement flyers door to door in several Minneapolis neighborhoods

Several public open house meetings were held along the proposed BLRT Extension project corridor, including general project open houses (June 2011), Scoping open houses (January 2012), site- or issue-specific open houses (2011/12), and open houses sponsored by Corridors of Opportunity organizations (2011/12). In addition to traditional open houses, project staff provided many opportunities for public input to the project until release of the Draft EIS in 2014, such as:

- Project-specific website, email, and phone lines throughout project planning.
- Staff participation in dozens of one-on-one meetings with individuals, business owners/managers, organizations, and agencies in the proposed BLRT Extension project corridor.
- Partnership with staff preparing the *Bottineau Transitway Health Impact Assessment*, including one-on-one interviews with stakeholder organizations, such as Lao Assistance, Summit Academy, Asian Economic Development Association, Northwest Hennepin Human Services Council, Healthy Together Northwest Network, North Point Health and Human Services Center, Harrison Neighborhood Association, Neighborhood Hub, Jordan Neighborhood, Transportation Equity Partnership, African Career, Education, and Resource, Inc., and Redeemer Center for Life.



The diversity of project meetings, materials, and information sources resulted in the involvement of EJ communities in many different ways, including:

- Corridors of Opportunity organizations, neighborhood organizations, and advocacy groups organized their own BLRT Extension project meetings and used their contacts and networks to attract new participants and make the most of opportunities related to the proposed BLRT investment.
- Members of many EJ communities served on the CAC for the project, and they have helped to share project information within their communities.
- Throughout the Draft EIS phase, members of EJ communities met with project staff to express and resolve individual property or business issues related to the project.
- Project meetings and open houses were consistently held in EJ communities to facilitate attendance by members of EJ communities at these meetings.

7.3.2 Draft EIS Public Meetings and Comments

In May 2014, four public meetings were held along the proposed BLRT Extension project corridor at the University of Minnesota Urban Research and Outreach-Engagement Center, Golden Valley City Hall, Brooklyn Park City Hall, and Crystal Community Center. The Draft EIS document and several copies of the executive summary and comment forms were provided, a flyover simulation video was featured, and attendees were provided the opportunity to fill out comment forms, ask questions of project staff, view exhibit boards, and access information on other initiatives in the proposed BLRT Extension project corridor. Meeting attendees were provided an opportunity to offer verbal testimony regarding the Draft EIS, and translators were offered in the meeting notifications.

The public was notified of the meetings in a variety of ways, including: project and Hennepin County websites, emails to contact list, press releases, Federal Register and Minnesota Environmental Quality Board (EQB) *Monitor* publications, partnership with corridor cities and community groups providing notices, and hard copy notices and documents at local libraries and government offices.

A wide range of perspectives were shared through public testimony and comments obtained during and following the meetings. In total, 1,252 comments were received during the public review period, 76 of which were recorded verbally or written on comment cards at the public meetings.



7.3.3 Final EIS–Phase Focused Environmental Justice Outreach Activities

In January 2015, outreach events began for the Final EIS phase of the proposed BLRT Extension project with a number of community meetings to re-connect with the corridor communities and share project information. Through these meetings, as issues were discussed and the proposed BLRT Extension project outreach team learned more about the communities and project details were refined, the branches of outreach expanded and additional community organizations, neighborhood associations, businesses, and other groups were included.

The BLRT Extension project outreach team developed a strategy to focus its Final EIS–phase efforts on individual communities and property owners by dividing the proposed BLRT Extension project corridor into three segments (Brooklyn Park; Crystal, Robbinsdale, and Golden Valley; and Minneapolis), each with a different population base and set of project concerns. The BLRT Extension project outreach leader for each segment was selected based on knowledge and understanding of the segment, and outreach efforts focused in each segment were tailored to the communities involved.

Table 7.3-1 summarizes the major EJ issues addressed during the development of the Final EIS. These issues were identified from comments received on the Draft EIS and through outreach conducted. (See **Chapter 9** and **Appendix G** for non-EJ issues noted in comments received on the Draft EIS.)

As the table shows, commenters had concerns about access to parks and recreation facilities, the loss of housing with the proposed BLRT Extension project, transit-dependent population access to the new light rail transit (LRT) service, economic development opportunities with the proposed BLRT Extension project, potential increase in property values resulting in displacement of low-income residents, outreach strategies to engage underrepresented communities, and safety along Olson Memorial Highway (Trunk Highway [TH] 55). These concerns helped inform and guide the level and type of outreach and analysis to be included in the Final EIS. The table also shows the proposed BLRT Extension project actions in response to the concerns.



Table 7.3-1. Major Environmental Justice Issues Addressed during Final EIS Development

Area of Concern	Major Issues	Project Actions	Comment Received on Draft EIS?
Parks and Recreation	Economically disadvantaged youth of color would lose access to the healthier outdoor environment with diminished recreational experience in area parks.	Outreach team has enhanced coordination efforts and dissemination of project information with local community groups to discuss project effects, including no permanent impacts to recreational facilities in parks, and park enhancements such as new trails and improved accessibility to parks.	Yes
Acquisitions and Relocations	Concern over loss of housing with project, particularly with Alignment D2 (see Chapter 2) along Penn Avenue.	BLRT Extension project does not result in full property acquisitions or relocation of residents, avoiding the residential impacts of Alignment D2.	Yes
Transit	Transit-dependent populations in isolated low-income communities would not have access to the new LRT service, for example, residents in North Minneapolis near the D2 alignment.	New LRT service would be part of an integrated transit system, with feeder bus service connecting transit-dependent neighborhoods to proposed BLRT stations and complementary arterial bus rapid transit (BRT) along Penn Avenue to provide north Minneapolis neighborhoods with enhanced transit service.	Yes
Economic Development	Interest in equitable economic development opportunities near station locations for local residents.	Station Area Planning activities are considering public input in local development policies that would create economic development opportunities and guide land use.	Yes
	Concern over adverse impact on lower income populations due to increased property values near transit stations, resulting in the involuntary displacement of low-income residents.	The Council has an active affordable-housing program to help cities maintain a viable proportion of affordable housing in Metro Area cities. Outreach staff coordinating with Station Area Planning teams and local cities to share these concerns.	Yes
Public Engagement	Project should pro-actively engage underrepresented groups, particularly those who cannot attend meetings.	The outreach team has continued to work with the communities along the proposed BLRT Extension project corridor, partnering with local community groups and agencies, as well as often going door to door to speak to local residents.	Yes



The following organizations were engaged during the Final EIS phase, supporting minority groups and/or lower income individuals. Many of these organizations are members of the Blue Line Coalition, a group serving and representing low- to moderate-income people and various communities of color along the proposed BLRT Extension project corridor. Their mission is to enhance the community-based power and leverage that power in advancing local and regional equity, and strengthening healthy, safe communities.

- African American Leadership Forum⁵
- African Career, Education & Resource, Inc.⁵
- Afrifest Foundation
- Alliance for Metropolitan Stability⁵
- Asian Economic Development Association⁵
- Asian Media Access⁵
- Black Women in Business Alliance
- Brooklyn Area Ministerial Association
- Bryn Mawr Neighborhood Association
- Center for Asians and Pacific Islanders⁵
- Center for Urban & Regional Affairs
- Centro de Trabajadores Unidos en Lucha
- Cleveland Neighborhood Association
- City of Lakes Community Land Trust⁵
- Cycles for Change
- Global Fatherhood Foundation
- Harrison Neighborhood Association
- Heritage Park Neighborhood Association⁵
- HIRE MN
- Lao Assistance Center of Minnesota⁵
- La Asamblea de Derechos Civiles
- Masjid An-Nur⁵
- Metropolitan Consortium of Community Developers
- Metropolitan Interfaith Council on Affordable Housing⁵
- Minneapolis Regional Labor Federation
- Minneapolis Urban League
- Minnesota African Women's Association
- Native American Community Development Institute⁵
- Neighborhood Development Corporation
- Neighborhoods Organizing for Change
- North Hennepin Community College
- Northside Residents Redevelopment Council⁵
- Northwest Human Service Council
- Organization of Liberians in Minnesota
- Redeemer Center for Life
- Summit Academy OIC⁵
- Umunne Cultural Association
- Wayman AME Church
- Yes, Inc. (formerly Pro USA, Inc.)

The BLRT Extension project outreach team led or participated in over 170 events with members of the public and local stakeholders between January 7, 2015, and December 28, 2015, including a variety of committee/board meetings (for example, CAC, Business Advisory Committee, Blue Line Coalition), meetings with community organizations and neighborhood groups, project Open Houses, Station Area Planning meetings, and individual meetings with property owners and other interested persons.

In addition, outreach staff participated in a number of events sponsored by others, staffing tables or booths, distributing project information, and taking comments. Also, in January 2015, the Council's BLRT Extension Project Office (BPO) opened in the central part of the proposed BLRT Extension project corridor in the City of Crystal near the proposed Bass Lake Road Station. In addition to the

⁵ Member of Blue Line Coalition



BPO being a shared space for staff working on the proposed BLRT Extension project, the BPO has hosted many outreach efforts and meetings with members of the public.

The outreach events occurred throughout the Final EIS phase, and feedback received from the meeting or event attendees was recorded and shared with the proposed BLRT Extension project team and considered in the refinement of the proposed BLRT Extension project and analysis of its environmental and social impacts. This iterative process engaged a wide cross-section of the study area, including every EJ community identified through initial US Census Bureau demographic data, as well as those identified through the outreach process. Through the outreach process the Council outreach staff identified a West African community in Crystal, a Liberian community in Brooklyn Park, and an Oromo community in Brooklyn Park. A summary of these outreach events is provided in **Table 7.3-2**.

Table 7.3-2. Summary of Final EIS–Phase Outreach Events

General Location	Number of Outreach Events	Type(s) of Meetings/Events						
		Meetings with Property Owners	Meetings with Community/Business Organizations	Participation in Other Community Events	Committee, Council, or Board Meetings	Project Open Houses	Station Area Planning Meetings	Meetings with Other Interested Individuals/Groups
Downtown / Olson Memorial Highway	2		X	X				
North Minneapolis	7		X	X	X		X	
Van White Boulevard Station area	20	X	X	X	X	X		X
Plymouth Avenue Station area	1			X				
Golden Valley – other	5		X		X	X		
Golden Valley Road Station area	5	X	X			X		X
Robbinsdale – other	3					X	X	
Robbinsdale Station area	11	X	X			X		X
Crystal – other	12	X			X	X	X	
Bass Lake Road Station area	5	X		X		X		
BLRT Extension Project Office ¹	19	X	X		X			X
Brooklyn Center	13		X		X			
Brooklyn Park – other	6	X	X	X				
Brooklyn Park civic area	21	X			X		X	X
63rd Avenue Station area	2	X		X				
Brooklyn Blvd. Station area	13	X	X			X		X
85th Avenue Station area	9		X	X		X	X	X
93rd Avenue / Oak Grove Parkway Station areas	6	X	X	X				
Outside proposed BLRT Extension project corridor	11		X		X			X

¹ Events occurring at BLRT Extension Project Office are not counted with Bass Lake Road Station area.



7.4 Environmental Justice Impacts Analysis

The FTA Circular (August 2012) defines a disproportionately high and adverse effect on human health or the environment to include an adverse effect that:

- Is predominantly borne by a minority population and/or a low-income population,
- Will be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low-income population

The FTA Circular (Section 2.C.2, *Determining Whether Adverse Effects are Disproportionately High*) states that, in making determinations regarding disproportionately high and adverse effects on minority and low-income populations, mitigation and enhancement measures that would be implemented and all offsetting benefits to the affected minority and low-income populations may be taken into account. This is particularly important for public transit projects because they often involve both adverse effects (such as short-term construction impacts and increases in bus traffic) and positive benefits (such as improved transportation options and connectivity, or overall improvement in air quality).

All environmental categories were reviewed to identify those environmental categories that would not result in any adverse effects, based on the analysis described in **Chapters 3 and 4** of this Final EIS. The environmental categories with no adverse effects identified were not considered for additional EJ analysis due to having no adverse effects and thus no potential for disproportionately high and adverse effects to EJ populations. Environmental categories that would result in adverse effects were retained to determine if and to what extent these adverse effects would affect EJ populations (that is, have the potential to be disproportionately high and adverse or predominantly borne by EJ populations). **Table 7.4-1** includes all environmental categories and shows whether each requires additional EJ analysis. The rationale for the selection of these categories is also provided.



Table 7.4-1. Environmental Categories Requiring Additional Environmental Justice Analysis

Environmental Category	EJ Analysis Required (yes/no)	Rationale
Transit Conditions – Section 3.1	Yes	Public comments on Draft EIS about transit access
Freight Rail Conditions – Section 3.2	No	No adverse impacts with construction-phase mitigation
Vehicular Traffic – Section 3.3	No	No adverse impacts with construction-phase mitigation
Pedestrians and Bicyclists – Section 3.4	No	No adverse impacts with construction-phase mitigation
Parking – Section 3.5	No	No adverse impacts with mitigation (construction and operating phases)
Aviation – Section 3.6	No	No adverse impacts
Land Use Plan Compatibility – Section 4.1	No	No adverse impacts
Community Facilities/Community Character and Cohesion – Section 4.2	No	No adverse impacts with construction-phase mitigation
Parks and Recreation – Section 4.2 and Chapter 8	Yes	Public comments on Draft EIS about park access
Displacement of Residents and Businesses – Section 4.3	Yes	Displacements of businesses may disproportionately affect EJ populations
Cultural Resources – Section 4.4	No	No Adverse Effect with mitigation
Visual/Aesthetics – Section 4.5	Yes	Impacts can be mitigated, but may disproportionately affect EJ populations
Economic Effects – Section 4.6	No	No adverse impacts
Safety and Security – Section 4.7	No	No adverse impacts with construction-phase mitigation
Utilities – Section 5.1	No	No adverse impacts with construction-phase mitigation
Floodplains – Section 5.2	No	No adverse impacts with operating-phase mitigation
Wetlands – Section 5.3	No	No adverse impacts with mitigation (construction and operating phases)
Geology, Soils, and Topography – Section 5.4	o	No adverse impacts with construction-phase best management practices (BMPs)
Hazardous Materials Contamination – Section 5.5	No	No adverse impacts with construction-phase mitigation
Noise – Section 5.6	Yes	Operating-phase impacts may disproportionately affect EJ populations
Vibration – Section 5.7	No	No adverse impacts, with mitigation (construction and operating phases)
Biological Environment – Section 5.8	No	No adverse impacts, with mitigation (construction and operating phases)
Water Quality and Stormwater – Section 5.9	No	No adverse impacts, with mitigation and BMPs (construction and operating phases)
Air Quality/Greenhouse Gas Emissions – Section 5.10	No	No adverse impacts with construction-phase mitigation and BMP; long-term benefit to greenhouse gases offsets construction-phase impacts



Table 7.4-1. Environmental Categories Requiring Additional Environmental Justice Analysis

Environmental Category	EJ Analysis Required (yes/no)	Rationale
Energy – Section 5.11	No	No adverse impacts
Indirect Impacts: Economic Effects – Section 6.2.2.6	Yes	Public comments on Draft EIS about economic development effects on property values

The following sections provide a description of additional EJ analysis for the six environmental categories identified as having potential for disproportionately high and adverse effects predominantly borne by EJ populations, including a summary of the EJ finding for each of the environmental categories evaluated. These EJ findings assess whether the anticipated impacts of the environmental categories evaluated would likely result in disproportionately high and adverse impacts on minority and low-income populations. This assessment includes consideration of offsetting benefits the proposed BLRT Extension project would have on minority and low-income populations, as well as consideration of mitigation measures identified throughout this Final EIS. The proposed BLRT Extension project’s final project-wide EJ finding is included in [Section 7.5](#).

7.4.1 Transit

7.4.1.1 Transit Access

Access to transit and alternative modes of transportation is most critical to populations that have limited or no access to personal vehicles. As [Table 7.4-2](#) shows, 13.2 percent of the households in the study area do not have access to a vehicle. In Hennepin County, 10.1 percent of the households do not have access to a vehicle. The EJ communities with concentrations of no-vehicle households near the proposed LRT stations would receive a benefit from the proposed BLRT Extension project by having easy access to destinations throughout the regional network.

Throughout the development of the Alternatives Analysis and the Draft EIS, the public and project stakeholders expressed concern about the North Minneapolis EJ community’s access to the proposed BLRT Extension project (then referred to as Alternative B-C-D1). Many stakeholders commented at meetings and on the Draft EIS that the other similar alternative considered, Alternative B-C-D2, would provide the EJ community in North Minneapolis with better access to the LRT since it would extend along Penn Avenue and would be more centrally located within this EJ community. The Policy Advisory Committee selected Alternative B-C-D1 as the locally preferred alternative over Alternative B-C-D2 because it would result in significantly less property and neighborhood impacts, improved travel time, greater cost-effectiveness, and less disruption of roadway traffic operations (see [Section 2.4](#) for more detail on the process for selecting the locally preferred alternative). The Draft EIS found that Alternative B-C-D2 had the potential for long-term disproportionately high and adverse impacts to EJ communities, including 105 residential displacements, 270 net parking spaces lost, changes in community character, and visual quality impacts from the introduction of LRT on a relatively narrow roadway. The disproportionately high



and adverse impacts to EJ populations outweighed the benefits of this alternative. The selected Alternative B-C-D1 (the proposed BLRT Extension project) would provide transit access to EJ populations without the associated impacts to EJ populations in North Minneapolis.

Since the selection of Alternative B-C-D1 (the proposed BLRT Extension project), the Penn Avenue corridor in North Minneapolis has been incorporated by the Council into a proposed BRT line known as the C Line. The proposed C Line and stations would be adjacent to the proposed BLRT Extension project corridor and would directly serve the high concentration of EJ populations in the North Minneapolis community. The proposed C Line supplements the proposed BLRT Extension project by providing a similar level of enhanced transit service and access to downtown Minneapolis to the populations that would have been served by the D2 alignment studied in the Draft EIS.

The proposed C Line BRT service would supplement existing Route 19. Presently, travel time on Route 19 from downtown Minneapolis to the Brooklyn Center Transit Center is approximately 46 minutes, and the C Line BRT would make the trip in approximately 35 minutes (Metro Transit, 2015). The C Line would include 10-minute headway during peak times, train-like features (pre-pay), enhanced station amenities (real-time departure signage and maps), enhanced security, and specialized vehicles.

During the development of the Final EIS, the Council evaluated the need to include both Plymouth Avenue and Golden Valley Road stations in the proposed BLRT Extension project (see [Section 2.5](#), Technical Issue 4). The issue of whether to include both stations was of particular concern to the EJ community because the Plymouth Avenue Station would serve the adjacent EJ population in North Minneapolis. In response to input from the public and other stakeholders, both stations are included in the proposed BLRT Extension project.



Table 7.4-2. Vehicles Available per Household by State, Region, County, and Study Area

Geography		Total Households	Households with No Vehicle Available	One Vehicle	Two or More Vehicles
Seven-county Twin Cities Metropolitan Area	Total	1,131,621	90,372	368,248	673,001
	%	100.00%	8.00%	32.50%	59.50%
Hennepin County	Total	481,263	48,771	174,647	257,845
	%	100.00%	10.10%	36.30%	53.60%
Minneapolis	Total	165,438	30,064	70,249	65,125
	%	100.00%	18.20%	42.50%	39.40%
Golden Valley	Total	8,685	416	2,970	5,299
	%	100.00%	4.80%	34.20%	61.00%
Robbinsdale	Total	5,999	756	2,236	3,007
	%	100.00%	12.60%	37.30%	50.10%
Crystal	Total	9,133	585	3,201	5,347
	%	100.00%	6.40%	35.00%	58.50%
Brooklyn Park	Total	26,342	1,922	7,856	16,564
	%	100.00%	7.30%	29.80%	62.90%
Study area	Total	36,317	4,808	14,303	17,206
	%	100.00%	13.20%	39.40%	47.40%

Source: US Census Bureau American Community Survey 2009 –2013 5-Year Estimates, Table B25044: Tenure by Vehicles Available (US Census Bureau, 2014)

To meet the needs of the region, including the transit-dependent populations identified above, Metro Transit, the region’s transit service provider, has an existing network of urban local bus routes and suburban express bus routes, light rail, and commuter rail, providing connectivity throughout the Twin Cities area.

Metro Transit intends to implement a comprehensive Regional Transitway System by 2040 that would include, in addition to the proposed BLRT Extension project, the following planned services:

- **Green Line Extension (LRT) / “Southwest LRT”** –14.5-mile extension of the existing Green Line (“Central Corridor LRT”) that would provide additional service to the growing communities of Minneapolis, St. Louis Park, Hopkins, Minnetonka, and Eden Prairie.
- **Orange Line (Bus Rapid Transit [BRT])** –17-mile METRO Orange Line BRT service on Interstate Highway 35W (I-35W) that would connect Minneapolis, Richfield, Bloomington, and Burnsville.
- **Red Line Extension (BRT) / “Cedar Avenue Transitway”** – extension of the existing Red Line BRT that would add an additional five stops to the south of the existing termination at the Apple Valley Transit Station.
- **Gold Line (BRT) / “Gateway Corridor”** – 12-mile BRT line connecting downtown St. Paul with its eastern suburbs including Woodbury and Lake Elmo.



Metro Transit is also planning an Arterial BRT Program that would include BRT services along urban corridors with existing high-ridership bus routes, as described below:

- **A Line BRT (“Snelling BRT”)** – BRT service along Snelling Avenue, Ford Parkway, and 46th Street, connecting to the Blue Line at 46th Street, and serving a commercial corridor.
- **C Line BRT (“Penn Avenue BRT”)** – BRT line connecting Downtown Minneapolis with the Brooklyn Center Transit Center along Olson Memorial Highway and Penn Avenue, serving the North Minneapolis neighborhood.

Moreover, Metro Transit would modify existing bus routes to be most efficient after implementation of the proposed BLRT Extension project, reducing redundancy and maximizing connectivity. The 2040 Feeder Bus Plan, currently under development, would extend the reach of accessibility to the Blue Line beyond just those within the vicinity of the proposed stations, but also along each of these feeder lines. The service areas of the feeder bus routes would also include EJ populations that would benefit from the proposed BLRT Extension project.

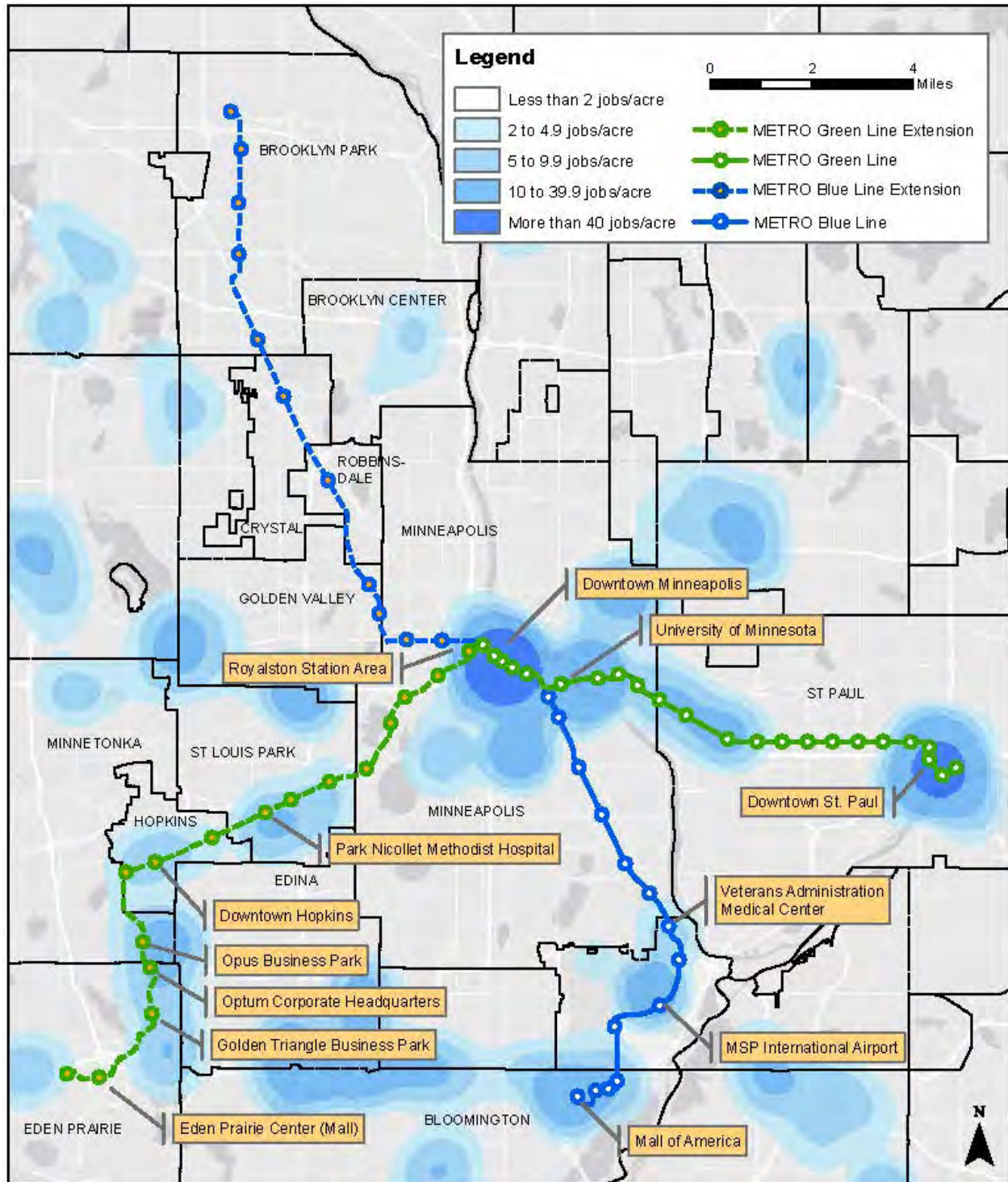
7.4.1.2 Transit Connectivity

The workforce in the Twin Cities region is distributed among Downtown Minneapolis, Downtown St. Paul, the Mall of America/Minneapolis–St. Paul International Airport area, and a number of other employment centers, as shown in **Figure 7.4-1**. Areas in darker shades of blue show denser concentrations of jobs per acre, and these areas are located predominantly along existing and planned LRT lines.

Along the proposed BLRT Extension project corridor, key employment and other destinations include Target Headquarters, North Memorial Medical Center, a number of colleges (for example, Rasmussen College – Brooklyn Park Campus, North Hennepin Community College, Hennepin Technical College, Minnesota International University), shopping centers (for example, Park Square Shopping Center, Crystal Shopping Center, Wal-Mart Super Center), and several other public and community facilities.

In addition to the destinations described above, the proposed BLRT Extension project would provide a one-seat ride that would connect riders to downtown Minneapolis, Viking Stadium, the VA Medical Center, Minneapolis–St. Paul International Airport, and the Mall of America. Numerous other key destinations are available with a transfer to the Green Line, including downtown St. Paul, University of Minnesota, and a number of other public and health facilities, business parks, and shopping centers.

Figure 7.4-1. Twin Cities Regional Job Concentrations Served by Light Rail





7.4.1.3 Finding

The area served by the proposed BLRT Extension project would benefit substantially from implementation of the proposed BLRT Extension project. The proposed BLRT Extension project would serve the EJ community in North Minneapolis by including stations at Van White Boulevard, Penn Avenue, and Plymouth Avenue in the proposed BLRT Extension project area and would connect with the proposed C Line BRT along Penn Avenue. The new light rail line would provide connections with existing bus routes, LRT lines, BRT lines, and commuter rail, as well as transit services planned for the future. For transit-dependent populations, which are often low-income and minority populations, the enhanced transit connectivity provides greater access to employment opportunities, services, shopping, and recreation.

Not only are no adverse impacts anticipated during the operation of the proposed BLRT Extension project, but the benefits are substantial for EJ populations. Therefore, the proposed BLRT Extension project *will not have a disproportionately high and adverse impact on EJ populations related to transit.*

7.4.2 Parks and Recreation

7.4.2.1 Construction-Phase (Short-Term) Impacts

The construction of the proposed BLRT Extension project may result in temporary modifications to roadways and/or pedestrian or bicycle facilities that would change park access patterns. Construction may also result in temporary noise, vibration, and air quality impacts at parks proximate to construction activities.

In addition to potential short-term access; noise, vibration, and air quality impacts might affect parks; temporary easements from Theodore Wirth Regional Park (TWRP) would be required to construct the proposed BLRT Extension project guideway north of Olson Memorial Highway where it transitions from the street right-of-way to the BNSF Railway (BNSF) rail corridor. TWRP is located adjacent to an EJ area, but any impacts from construction would be temporary and occur in limited areas of this large park.

Construction of the proposed BLRT Extension project would require temporary occupancy of both Sohacki Park: Mary Hills Management Unit for grading, and Sohacki Park: Sohacki Management Unit for construction access and staging. Also, a temporary occupancy of Becker Park would be needed to reconstruct the sidewalk/trail from the park to the Bass Lake Road Station which may temporarily impact park facilities and recreation opportunities. The proposed BLRT Extension project would restore these parks to pre-construction conditions; moreover, the proposed BLRT Extension project would include enhancements to Sohacki Park to mitigate for the temporary occupancy.

All construction impacts are temporary and no adverse construction-phase impacts resulting from the proposed BLRT Extension project are identified; therefore, there is no potential for any high and adverse construction impacts to be disproportionately borne by EJ populations.



7.4.2.2 Operating-Phase (Long-Term) Impacts and Benefits

Operating-phase effects on EJ populations are discussed below for parks that serve EJ populations near parks or serve as destinations for EJ populations using the proposed BLRT Extension. The proposed BLRT Extension project includes stations that are located within a half mile or less of many parks. Most of these are small parks with limited facilities and are more likely to serve populations that live near these parks than to be a destination point for proposed BLRT Extension project riders. However, there are some larger parks, such as TWRP and Sochacki Park, that are destinations for regional populations and their location in proximity to the proposed BLRT Extension project, particularly the Plymouth Avenue and Golden Valley Road stations, allows transit-dependent populations to access them more easily. All parks along the proposed BLRT Extension project corridor are described in greater detail in [Section 4.2](#).

Theodore Wirth Regional Park

The proposed BLRT Extension project borders the eastern boundary of TWRP within an existing BNSF rail corridor. The proposed BLRT Extension project would require permanent easements from TWRP; however, these easements are not anticipated to impact park facilities or recreational use.

Some of the TWRP walking trails and cross country ski trails are near the proposed BLRT Extension project alignment. Deciduous trees currently provide some visual screening of the existing rail corridor; their buffering effect would be reduced as a result of leaf loss during the winter months. Recreational users of the park during these months may see elements of the proposed BLRT Extension project not visible during spring and summer months; however, these effects would be borne by both EJ and non-EJ users of the park.

In addition, the existing TWRP trail that runs adjacent to Bassett Creek near Plymouth Avenue would be relocated to the west and out of the BNSF right-of-way. Enhanced trail connections providing greater levels of connectivity with the regional trail system and the proposed Plymouth Avenue Station are being considered. The proposed BLRT Extension project includes a trailhead at the eastern corner of the proposed Golden Valley Road Station park-and-ride and the new Golden Valley Road bridge would be designed to accommodate a new trail connection under the bridge between TWRP and Sochacki Park: Mary Hills Management Unit and Sochacki Park: Sochacki Management Unit.

The proposed BLRT Extension project would improve access to TWRP not only for those living within the vicinity of the park, but also for regional users, including transit-dependent EJ populations, via the Plymouth Avenue and Golden Valley Road stations. The changes to the trail system would not impact the community, which includes a low-income neighborhood with a high percentage of minorities (predominantly African-American/black) to the east of the park.



Sochacki Park: Mary Hills Management Unit / Sochacki Park: Sochacki Management Unit / Glenview Terrace Park / South Halifax Park

Sochacki Park: Mary Hills Management Unit, Sochacki Park: Sochacki Management Unit, South Halifax Park, and Glenview Terrace Park are located north of TWRP in the cities of Golden Valley and Robbinsdale. Sochacki Park: Mary Hills Management Unit (City of Golden Valley) and Sochacki Park: Sochacki Management Unit (City of Robbinsdale) are located on the western side of the existing BNSF tracks (proposed BLRT Extension project corridor) and connected by a meandering trail system. Glenview Terrace Park (City of Golden Valley) and South Halifax Park (City of Robbinsdale) are located on the eastern side of the tracks. These parks are located in areas of high concentrations of EJ populations.

The proposed BLRT Extension project would require a very small permanent easement from Glenview Terrace Park at its western edge; however, the active uses of the park are well buffered from this area by a ravine and wooded area and would not be noticeably affected. This impact to the park property would not impact users of the park.

For all four parks, increased transitway operations would have no direct impact on the recreational features of the parks and minimal impact on the enjoyment of the park for users closer to the rail corridor. The trail connecting Sochacki Park: Mary Hills Management Unit and Sochacki Park: Sochacki Management Unit generally parallels the existing rail corridor, with deciduous vegetation providing some visual screening. The recreational experiences of this park resource may be lessened because of the effects of increased transitway operations and change in setting.

As noted above, construction of the proposed BLRT Extension project would require temporary occupancy of Sochacki Park in addition to subsequent restoration of this amenity to at least as good as its pre-construction condition with added enhancements. The long-term enhancements to the park would include a trail connection between Sochacki Park and TWRP with a tie-in to the Bassett Creek Regional Trail, and a paved trail that extends to the northern park entrance, all in accordance with the Sochacki Park Conceptual Master Plan. See **Chapter 8** of this Final EIS for more details. These enhancements would improve the recreational functions of the park for all users, including the EJ populations in nearby communities.

Finally, construction of the proposed BLRT Extension project would require closing the existing informal and prohibited crossings of the BNSF track at Sochacki Park. Fences or other barriers to discourage pedestrian crossings would be necessary in these locations to preserve pedestrian safety near the LRT and freight tracks. In lieu of this prohibited crossing, users would be able to safely cross between Sochacki Park and Glenview Terrace Park or between Sochacki Park and South Halifax Park via pedestrian improvements at the Golden Valley Road Station to the south or via the reconstructed 36th Avenue bridge to the north about three-quarters of a mile south of the Robbinsdale Station. While the two options create an indirect path for park users than directly crossing over the BNSF tracks, it allows for a safe and secure access to both users of the parks and to the railroads and transit operations.



Triangle Park / Lee Park

Triangle Park is located just south of the proposed Robbinsdale Station and Lee Park is located approximately 0.4 mile from the Robbinsdale Station, both in areas with concentrations of EJ populations. Lee Park is bordered by the BNSF rail corridor on the east, with fencing providing a barrier between the rail corridor and the park. The fencing is expected to remain, thereby providing a barrier between park activities and transitway operations. Triangle Park is located adjacent to the proposed BLRT Extension project alignment, and the perimeter of the park is bounded by chain-link fencing. Neither park would be affected by the proposed BLRT Extension project. Moreover, the proximity of these parks to the Robbinsdale Station would improve access to the parks by local and regional EJ populations.

Becker Park

Becker Park is a 12.4-acre park in the City of Crystal that provides amenities and programs that serve as resources not only for users in the local neighborhood but also for visitors outside of the area (Hennepin County, 2013). The park is located directly west of the proposed Bass Lake Road Station, east of the BNSF and LRT tracks, and in the vicinity of high percentages of EJ populations.

The proposed BLRT Extension project includes pedestrian improvements on Bass Lake Road that would connect the station with Becker Park. For safety reasons, the proposed BLRT Extension project would also include fencing along the eastern boundary of the park that would provide a barrier to the existing railroad and the transit station. South of Bass Lake Road, the proposed BLRT Extension project also includes improved pedestrian crossings of the LRT tracks at West Broadway Avenue (County State-Aid Highway 103; about 1 mile south of the Bass Lake Road Station) and Corvallis Avenue (about two-thirds of a mile south of the Bass Lake Road Station), further increasing accessibility of the park to users. Becker Park would not be adversely impacted with the proposed BLRT Extension project; however, improved access and connectivity would be a benefit for all users, including local and regional EJ populations.

7.4.2.3 Finding

Data from the Metropolitan Regional Parks and Trails 2008 survey presented in the *Bottineau Transitway HIA* (Hennepin County, 2013) shows that the majority of visitors to the Metropolitan Regional Park and Trail system access these facilities by car, truck, recreational vehicle (RV), or van. For populations that do not live close enough to walk to these parks and have limited vehicle access, these parks and the low-cost opportunities for physical activity they offer may be out of reach. Improved transit service to the parks in the study area would increase physical activity accessibility for EJ populations.

The permanent easements from park properties required with the proposed BLRT Extension project would not result in impacts to park users, and the proximity of the parks to the rail corridor and transitway operations would not substantially affect the enjoyment of the parks. Therefore, the proposed BLRT Extension project *will not have a disproportionately high and adverse impact on EJ populations related to parks and recreation.*



7.4.3 Displacement of Residents and Businesses

7.4.3.1 Effects on Businesses

Property acquisitions would affect 291 properties in the study area, including residential (207 partial acquisitions, one full acquisitions), commercial (42 partial and 11 full acquisitions), industrial (18 partial and two full acquisitions), and public land (10 partial acquisitions). The partial acquisitions most commonly involve a strip of land needed to widen an existing transportation right-of-way. No residences would be displaced; however, 10 businesses would be displaced as described in **Table 7.4-3**.⁶

Table 7.4-3. Business Displacements and Environmental Justice Owner Status

Location	Name of Displaced Business or Property	EJ Owner or Tenant?	Serving EJ Community?
4740 42nd Avenue North, Robbinsdale	Sawhorse	No	Yes
4719 42nd Avenue North, Robbinsdale	EMI Audio	No	Yes
4165 Hubbard Avenue North, Robbinsdale	Northside Oriental Market	Yes – owner/tenant	Yes
4900 West Broadway Avenue, Crystal	Steve O’s Restaurant	No	Yes
5501 Lakeland Avenue North, Crystal	Schrader Building – office building with 4 tenants	Yes – tenant	Yes
7308 Lakeland Avenue North, Brooklyn Park	American Furniture Mart	No	Yes
7300 Lakeland Avenue North, Brooklyn Park	Modern Dental Studio	Yes – owner	Yes

Based on the extensive public outreach as described in **Section 7.4**, and as shown in the table, some of the businesses are minority-owned. As described in more detail in **Section 4.3**, loss of private property would be mitigated by payment of fair market compensation and provision of relocation assistance in accordance with the Uniform Relocation Act. For these non-residential displacements, the following would be provided to both EJ and non-EJ business operators:

- Relocation advisory services
- Minimum 90 days written notice to vacate prior to requiring possession
- Reimbursement for moving and reestablishment expenses

⁶ The full acquisitions listed do not necessarily match the number of displacements, since several of the full acquisitions are vacant parcels that are zoned commercial or residential. A vacant parcel is counted as an acquisition in the category that matches how the parcel is zoned, but is not counted as a displacement since there is no residence or business to be displaced.



7.4.3.2 Effects on Employees and Customers

In addition to the property and business owners, displacement of businesses also has the potential to affect employees and customers of these establishments. All businesses that would be displaced are located within or adjacent to EJ areas, and thus may have minority or lower-income employees and/or customers. As described above, displaced businesses would be provided assistance with relocation and reestablishment expenses. Employees of each of the businesses may be minority or lower-wage hourly workers that would potentially have a longer or different commute to the new business site after the relocation or may opt for alternate employment. The potential effects of the displacement of businesses with the proposed BLRT Extension project on their customers are described below.

- **Sawhorse** is a design and building company specializing in residential home remodeling throughout the Twin Cities. Given the nature of this enterprise, it is unlikely that EJ populations use and rely on this business more than non-EJ populations. The business serves the entire Twin Cities area and potential relocation to another neighborhood would not substantially impact its customer base. Therefore, the displacement of Sawhorse would not result in disproportionately high and adverse impacts to EJ populations.
- **EMI Audio** provides lighting and audio/visual rental equipment, as well as design, sales, installation, repair, and service of audio equipment. Given the nature of this enterprise, it is unlikely that EJ populations use or rely on this business more than non-EJ populations.
- **Northside Oriental Market** is a relatively small grocery store specializing in Asian foods. The displacement of this enterprise has the potential to impact the EJ community it serves.
- **Steve O's Restaurant** is a local bar and restaurant serving traditional American barbeque and grill cuisine, serving the residents of the EJ community in which it is located as well as other patrons.
- **The Schrader Building** is a 14,000-square-foot, two-story office building with multiple suites. The building is owned by ALS Properties and their headquarters currently occupies a portion of the building. The property tenants consist of the following businesses:
 - **Hart Custom Homes / ALS Properties / Venture Real Estate Services** own the Schrader Building. This company sells, transports, and installs manufactured homes and also develops and manages manufactured housing communities throughout the Midwest. Given the nature of this enterprise, residents of the EJ community in which it is located may utilize this business.
 - **United Staffing, Inc.** is a minority-owned business with headquarters in Bloomington, Minnesota and locations throughout the country that helps connect businesses with employees. Given the nature of this enterprise, the EJ community in which this business is located may rely on this business.
 - **Andrew C. Frasier, CPA** provides personal financial and tax guidance to individuals and businesses and may serve the EJ community in which it is located.
 - **Brianna's Hair Studio** provides hair care services, specializing in ethnic hair styling and care and serves the EJ community in which the business is located.



- **American Furniture Mart** sells pre-owned, hotel liquidation, closeout, and discontinued furniture for discounted prices and may serve the EJ community in which the business is located.
- **Modern Dental Studio Inc.** provides dental services to patients and may serve the EJ community in which it is located.

7.4.3.3 Finding

- As described above, both EJ and non-EJ business and property owners would be compensated consistent with state and federal requirements. The Council shall identify relocation sites by working with the business owners through the right-of-way acquisition process. Relocation sites shall be considered based on the business owners' preferences to retain their client base and/or continue to serve a similar population. Relocation expenses shall be considered consistent with state and federal requirements. Therefore, the required property acquisitions *will not be disproportionately high and adverse on EJ business owners* displaced with the proposed BLRT Extension project.
- Since it is unknown at this time whether businesses would relocate within the same community, the result of the displacements of the five businesses noted above may have the potential for disproportionately high and adverse effects on EJ populations in the communities currently served by the businesses. The specific businesses cited above that likely have a predominantly minority and/or low-income clientele include: Northside Oriental Market; American Furniture Mart; Unified Staffing, Inc. (tenant of Schrader Building); Hart Custom Homes (owner and tenant of Schrader Building); and Brianna's Hair Studio (tenant of Schrader Building). For impact on the communities served by the displaced businesses, the Council shall provide notices to the affected EJ community with the business' new location (if a suitable relocation was identified) with transit options to access the new business location, and/or other options to meet their needs. Since it is unknown at this time whether businesses would relocate within the same community, the result of the displacements of the five businesses noted above would have the potential for disproportionately high and adverse effects on EJ populations in the communities currently served by the businesses.



7.4.4 Visual/Aesthetics

7.4.4.1 Construction-Phase (Short-Term) Impacts

Visual impacts from construction of the proposed BLRT Extension project may include the temporary presence of heavy equipment, transport and delivery of construction materials and equipment, pedestrian and traffic control measures and detours, and other construction activities such as the use of staging areas. Staging areas would be restored to pre-project conditions after completion. Particularly noticeable construction activities to sensitive viewer groups, in areas with concentrated EJ populations, include:

- The reconstruction of the Olson Memorial Highway Bridge over Interstate Highway 94 (I-94) to create adequate width for the transitway would be highly visible to travelers along I-94 and Olson Memorial Highway.
- Construction work at TWRP, Sochacki Park, South Halifax Park, Rice Lake Park, and Sochacki Park: Mary Hills Nature Area, particularly the reconstruction of the westbound Olson Memorial Highway bridge over the BNSF rail corridor, would likely be perceived as undesirable and not consistent with users' anticipated recreational experience.
- The reconstruction of the BNSF bridge over TH 100 to create adequate width for the transitway would be highly visible to travelers along northbound TH 100. Where the transitway passes along residential neighborhoods, the construction activity would likely be perceived as more visually disruptive to these typically peaceful residential settings.

Implementation of mitigation measures would help to reduce the impacts of construction of the proposed BLRT Extension project on sensitive viewer groups in the proposed BLRT Extension project area. Mitigation measures during construction include limiting pre-construction clearing, preserving existing vegetation wherever possible, revegetating after construction, avoiding locating staging areas adjacent to high-sensitivity receptors, and minimizing light disturbance during construction.

7.4.4.2 Operating-Phase (Long-Term) Impacts

Project implementation would not result in a substantial change to the visual character of the study area as a whole. The majority of visual quality changes resulting from the proposed BLRT Extension project described in [Section 4.5](#) is considered "neutral" (either before or after mitigation). However, substantial visual effects (either substantially altered views or adversely impacted visual features) would occur in some areas:

- **Boulevard and median trees along Olson Memorial Highway west of I-94 in the City of Minneapolis:** Visual impacts to the Olson Memorial Highway center median would be substantial, as young trees would need to be removed for the transitway alignment. After the transitway is constructed in the center median, there would not be adequate space for new trees. However, trees at the highway edges would remain and continue to support the "gateway" appearance of the study area.



- **Theodore Wirth Regional Park in the City of Golden Valley:** Visual impacts to TWRP would be substantial since views to the BNSF right-of-way may be opened up by grading and vegetation thinning for the transitway. Additional features, such as catenary wires, support poles, tracks, and light rail vehicles, would add visual intrusions to the perceived “natural” character of the park, beyond the existing railroad and overhead utilities.
- **Bassett Creek and Bassett Creek Lagoon in the City of Golden Valley:** Visual impacts to Bassett Creek and Bassett Lake would be substantial. Project features would add visual intrusions to the perceived natural character of the parks beyond the existing railroad and overhead utilities.
- **Sochacki Park, South Halifax Park, Rice Lake, and Mary Hills Nature Center:** Visual impacts to these parks would be substantial. Similarly to TWRP, the additional features of the transitway would add visual intrusions to the perceived natural character of the parks.
- **Green Boulevard on west side of West Broadway Avenue between 47th Avenue and TH 100 in the cities of Robbinsdale and Crystal:** The construction of the transitway would require the removal of some mature trees and reduce the width of the green space separating the roadway and railroad. Visual effects would be substantial.
- **Bass Lake Road Station Area in the City of Crystal:** The proposed pedestrian bridge over Bottineau Boulevard would be a prominent visual feature, altering the viewshed at this location and resulting in substantial effects to visual quality. However, the new structure would not be out of character with the varied land uses (retail, commercial, transportation, etc.) at this location.
- **LRT corridor between Bass Lake Road Station and 62nd Avenue in the City of Crystal:** Between the proposed Bass Lake Road Station and the proposed 63rd Avenue Station in the City of Crystal, many existing residences already have a partial or full view of the existing rail corridor. Existing vegetation provides visual screening of the existing BNSF rail corridor and would also provide visual screening of the proposed LRT vehicles. However, in order to construct the proposed LRT alignment, vegetation removal, such as tree clearing, is proposed for portions of the BNSF right-of-way. Impacts on visual quality would be substantial.
- **63rd Avenue Station Area in the City of Brooklyn Park:** The proposed 63rd Avenue park-and-ride and pedestrian bridge over the BNSF rail corridor would be prominent visual features, altering the viewshed at this location and resulting in substantial effects to visual quality. However, the new structures would not be out of character with the varied land uses (retail, commercial, transportation, etc.) at this location.
- **73rd Avenue/Bottineau Boulevard Area:** While the proposed BLRT Extension project is designed to minimize impacts on land uses/private property, the proposed 73rd Avenue/Bottineau Boulevard bridge would result in the acquisition of commercial property to the south of the Brooklyn Boulevard Station. The new bridge would be a prominent visual feature, altering the viewshed and resulting in substantial effects to visual quality. However, the new bridge would not be out of character with the varied land uses (retail, commercial, transportation, etc.) at this location.
- **Rush Creek Regional Trail and Area:** The proposed Operations and Maintenance Facility (OMF) would be a prominent visual feature, altering the viewshed along the Rush Creek Regional Trail near the northern terminus of the proposed BLRT Extension project alignment. The new facility



would introduce a large structure to an otherwise minimally developed area. Further, the new OMF would alter views for recreational users, resulting in substantial effects to visual quality.

At locations where adverse visual effects are anticipated, mitigation measures include minimizing operational night lighting (minimizing glare and illumination of areas in the immediate vicinity of the proposed BLRT Extension project while maintaining lighting for safety and security) and screening project facilities using landscaping or walls consistent with applicable local policies and compatible with the character of the neighborhood to screen sensitive receptors and soften visual changes.

7.4.4.3 Finding

Based on a review of the distribution of project-related visual quality impacts throughout the study area and after the consideration of visual quality mitigation to be implemented by the proposed BLRT Extension project, the visual quality impacts are not disproportionately borne by EJ populations or appreciably more severe than those suffered by the non-EJ populations. Therefore, the proposed BLRT Extension project *will not have a disproportionately high and adverse impact on EJ populations related to visual quality.*

7.4.5 Noise

7.4.5.1 Construction-Phase (Short-Term) Impacts

Elevated noise levels from construction activities are, to a degree, unavoidable for this type of project. The proposed BLRT Extension project would require that construction equipment be properly muffled and in proper working order. While the proposed BLRT Extension project construction contractors are exempt from local noise ordinances, they will comply with applicable local noise restrictions and ordinances to the extent that is reasonable. Advanced notice would be provided to affected communities of any planned abnormally loud construction activities. It is anticipated that night construction may sometimes be required to minimize traffic impacts and to improve safety; however, construction would be limited to daytime hours as appropriate.

Excessive noise-generating activities, such as construction of retaining walls and bridges, would occur at multiple locations in the study area in both EJ and non-EJ areas. The primary means of mitigating noise from construction activities is to require the contractors to prepare a detailed Noise Control Plan. Key elements of the Plan would include:

- Contractor's specific equipment types
- Schedule and methods of construction
- Maximum noise limits for each piece of equipment with certification testing
- Prohibitions on certain types of equipment and processes during the nighttime hours without local agency coordination and approved variances
- Identification of specific sensitive sites near construction sites
- Methods for projecting construction noise levels
- Implementation of noise control measures where appropriate
- Methods for responding to community complaints



Temporary adverse impacts to noise levels resulting from the proposed BLRT Extension project would be experienced by those living within close proximity to the proposed BLRT Extension project alignment, particularly where retaining walls and or bridges would be constructed due to pile driving.

7.4.5.2 Operating-Phase (Long-Term) Impacts

With the proposed BLRT Extension project and prior to mitigation, there would be 368 moderate and 623 severe noise impacts at residential and institutional locations along the proposed BLRT Extension project alignment. The majority of the noise impacts are due to the sounding of LRT horns at at-grade crossings, primarily those shared with existing freight operations.

The primary mitigation measure would be the implementation of Quiet Zones⁷ at the shared at-grade crossings. This would eliminate the LRT horn sounding and would have the added benefit of eliminating the freight horns as well. With the implementation of Quiet Zones at all FRA-shared at-grade crossings, the number of noise impacts would be reduced to 175 moderate noise impacts and 120 severe noise impacts. At residences where residual noise impacts would remain after the implementation of the Quiet Zones, wayside devices, noise barriers, interior testing would be used for mitigation, as shown in **Table 5.6-7** in **Chapter 5** of this Final EIS. Should any of the municipalities decide not to apply to FRA for Quiet Zones, this decrease in moderate and severe noise impacts would not be achieved and residual noise impacts would not be mitigated. With the proposed mitigation measures, the majority of residential noise impacts would be eliminated. In the few locations where moderate and severe noise impacts would still occur, both EJ and non-EJ populations reside nearby (see **Table 5.6-7** for residual noise impacts with mitigation in the cities of Minneapolis, Golden Valley, and Robbinsdale).

7.4.5.3 Finding

Based on a review of the distribution of proposed BLRT Extension project-related moderate and severe noise impacts throughout the study area (see **Table 5.6-7**) and after the consideration of noise mitigation to be implemented by the proposed BLRT Extension project, the residual noise impacts are not disproportionately borne by EJ population or appreciably more severe than those suffered by the non-EJ population. Therefore, the proposed BLRT Extension project *will not have a disproportionately high and adverse impact on EJ populations related to noise.*

⁷ Quiet Zones are locations, at least one-half mile in length, where the routine sounding of horns has been eliminated because of safety improvements at at-grade crossings, including modifications to the streets, raised median barriers, four quadrant gates, and other improvements designed and implemented as a part of the proposed BLRT Extension project and consistent with Quiet Zone readiness. Horns are sounded in emergency situations at these locations. Municipalities must apply to FRA for approval of Quiet Zones.



7.4.6 Indirect Impacts and Cumulative Effects

Potential indirect impacts on EJ populations could result from increased development and redevelopment in the station areas. While not every station area is likely to see significant change in the short-term, those where demand for new development is stronger would be likely to experience increased property values and corresponding increases in rents and real estate taxes. While these impacts would be experienced by all populations in the study area, low-income persons may experience them to a greater extent and, particularly if they rent rather than own property, more likely as an adverse impact (**Figure 7.4-2**).

The Hennepin County Bottineau LRT Community Works program was established in 2014 to leverage the proposed BLRT Extension project by partnering with cities along the proposed BLRT Extension project corridor to help plan for and implement critical changes “beyond the rails.” The County is currently actively leading a Station Area Planning effort to help the community take advantage of the new transit investment in parallel with, but not as part of, the proposed BLRT Extension project. By providing an opportunity for dialogue among station-area residents, members of the business community, agency staff, and elected/appointed officials, the planning effort aims to create short- and long-term visions for the neighborhoods within 0.5 mile of each station. The community-based planning process examines the community’s goals and priorities, develops an overall vision for the station areas, and recommends actions for cities, agencies, and communities to consider moving forward (Hennepin County, 2015).

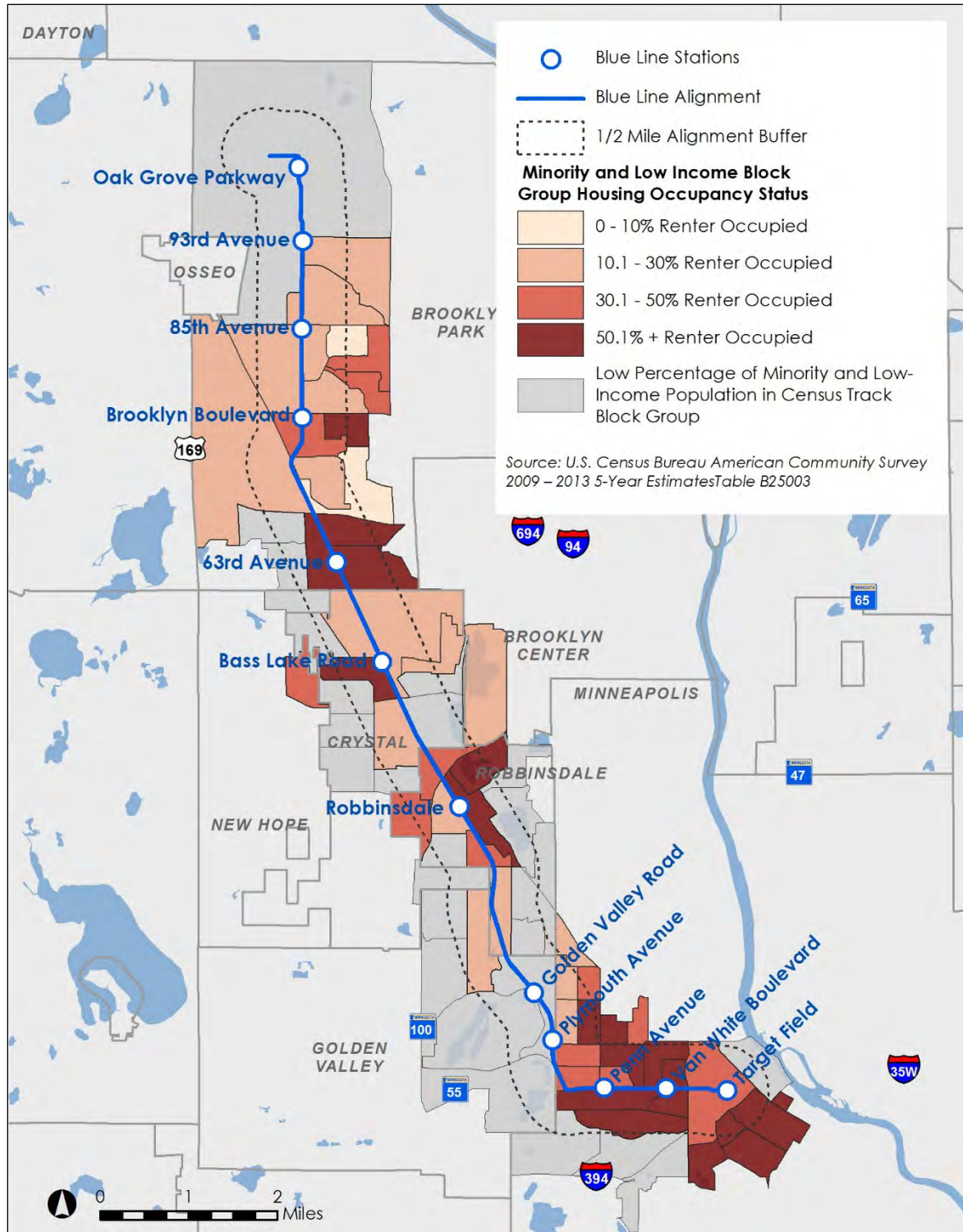
Station Area Planning efforts began in 2014 with the development of Community Working Groups to identify issues and to help define the planning effort moving forward. Open houses were held in November 2014, January 2015, and June 2015 to present and elicit feedback from the public on existing conditions and potential improvements. During the latter part of 2015, design workshops and community meetings were held in the cities of Minneapolis, Golden Valley, Robbinsdale, Crystal, and Brooklyn Park.

Among other things, the Station Area Planning efforts have addressed economic development opportunities near the LRT stations by including recommendations that would strengthen the character and economic viability of the areas while balancing the communities’ concerns for housing options, affordability, and sustainability. While any future development near stations that arise from the station-area plans may potentially increase property values and other costs in the area, the plans would include provisions to maintain a balanced range of housing types, including affordable housing.

Below is a summary of Station Area Planning outcomes related to housing. For more information about Station Area Planning, visit Hennepin County’s Community Works website, www.hennepin.us/residents/transportation/bottineau-community-works.



Figure 7.4-2. Minority- and Low-Income-Renter-Occupied Units (by Census Block Group)





Minneapolis Station Areas. The Minneapolis station areas of Van White Boulevard and Penn Avenue have more than 50.1 percent of low-income- or minority-renter-occupied units. The station-area plans for these stations include preserving existing housing and adding medium to high density market rate housing to balance the high percentage of rental housing. Proposed redevelopment sites are owned by the city of Minneapolis, which allows for stable investment in the community. Station area plans were completed in May 2015 for Minneapolis.

Golden Valley Station Areas. The Golden Valley station areas at Plymouth Avenue and Golden Valley Road are predominantly owner-occupied housing. The station-area plan for Plymouth Avenue identified a variety of new housing types to serve different incomes and different stages of life, while preserving existing housing.

Robbinsdale Station Areas. The downtown Robbinsdale station area has more than 50.1 percent of low-income- or minority-renter-occupied units. The station-area plan shows a desire for diverse housing choices (senior/affordable and apartments) and preserving the unique small town character of downtown.

Crystal Station Areas. The Crystal station area at Bass Lake Road has more than 50.1 percent of low-income- or minority-renter-occupied units. While the station-area plan is still under development, community input throughout the process has identified a demand for more housing around the station area and improving housing choices for the community.

Brooklyn Park Station Areas. The Brooklyn Park station areas at 63rd Avenue north and Brooklyn Boulevard have more than 50.1 percent of low-income- or minority-renter-occupied units in the vicinity. While the station-area plan is still under development, community input throughout the planning process has identified a need for multi-family rental housing, and preserving affordable and diverse housing. The other station areas in Brooklyn Park have predominantly owner-occupied units (85th Avenue, 93rd Avenue, and Oak Grove Parkway).

7.4.6.1 Finding

The proposed BLRT Extension project has the potential to indirectly spur development in the proposed BLRT Extension project corridor particularly around stations. This creates the potential for changes in property values as described above, which can be perceived as either an impact (generally for renters) or a benefit (generally for owners). These potential “pricing-out” impacts (that is, increased rents and decreased affordability for existing residents) can be offset by the decrease in transportation costs. The *HIA* suggests that cities, communities, and developers work together to keep existing and provide new affordable housing options in station areas to ensure that neighborhoods near the transit stations continue to be affordable for low-income households (Hennepin County, 2013). The Council will track new development (commercial, residential, industrial) along the proposed BLRT Extension project as a tool to evaluate new investment and monitor new affordable housing.

The proposed BLRT Extension project outreach staff have worked closely with community organizations whose work is devoted to affordable housing and equitable transitway development. These groups affiliated with the Blue Line Coalition include the City of Lakes Community Land



Trust, African Career, Education & Resource, Inc., Alliance for Metropolitan Stability, Nexus, Harrison Neighborhood Association, African American Leadership Forum, and Summit OIC. Two members of the Blue Line Coalition sit as voting members of the BLRT Extension project Corridor Management Committee. Additionally, many of these groups are represented on the Business or Community Advisory Committees that are integral to the decision-making process.

Hennepin County is proactively working with the cities to consider land use policies and strategies that retain existing affordable housing, minimize teardowns and promote redevelopment of underutilized properties to a mix of housing options. This work is supported in Hennepin County's Station Area Planning effort, which seeks input from the public, including EJ populations, to create a framework for any potential development that aligns with the community's goals and preferences.

Furthermore, the Council has established programs to encourage affordable housing planning and implementation that may offset potential indirect impacts to low-income persons. The findings from the FHEA identified a need to address equity in affordable housing and the policies to address this issue are included in the *Thrive MSP 2040*, Housing Policy Plan (www.metrocouncil.org/Housing/Planning/2040-Housing-Policy-Plan.aspx). The Council's role is to:

- Work with communities to create a mix of housing affordability, including subsidies to strategically locate market-rate housing in areas that lack such options as well as affordable housing in areas that lack affordability.
- Use Livable Communities Act resources to both catalyze private investment in areas of concentrated poverty and attract affordable housing to higher-income areas.
- Work with our partners and stakeholders to identify indicators to measure how projects, supported with Council resources, advance equity, including providing opportunities to residents of areas of concentrated poverty, lower-income households, and people with disabilities.
- Identify and address institutional challenges and barriers, including a lack of funding, to affordable housing development in Suburban, Suburban Edge, and Emerging Suburban Edge locations.
- Encourage private market interest in these targeted areas through transit investments, education, and marketing support to local communities.

To comply with the Metropolitan Land Planning Act and remain consistent with the Housing Policy Plan, the Council requires cities to demonstrate how affordable housing needs can be met in their local comprehensive plan updates. Cities must demonstrate how their comprehensive plan:

- Addresses the future housing need for forecasted growth.
- Acknowledges its allocation for future affordable housing need.
- Guides sufficient land at minimum residential densities of 8 units/acre to support the city's total allocation of affordable housing need.



Table 7.4-4 represents each corridor city’s allocation of affordable housing needed in its next comprehensive plan update. The affordable housing is divided between households earning at or below the area median income (AMI) to at or below 80 percent of the AMI.

Table 7.4-4. Affordable Housing Need Allocation of Corridor Cities, 2021–2030

City	Total Units of Affordable Housing Needed
Minneapolis	3,499
Golden Valley	111
Robbinsdale	76
Crystal	25
Brooklyn Park	583

Source: Metropolitan Council 2015 System Statements
www.metrocouncil.org/Communities/Planning/Local-Planning-Assistance/System-Statements.aspx

The multifaceted effort of county, Council, city, and local stakeholder involvement in creating and preserving affordable housing will provide a strong foundation for serving EJ populations indirectly impacted by the proposed BLRT Extension project. Since the majority of residents near proposed LRT stations own their homes and would perceive a benefit to their property values, and considering the offsetting benefits of proximity to enhanced transit, continued Station Area Planning efforts, and policies in the Housing Policy Plan, the proposed BLRT Extension project *will not have a disproportionately high and adverse impact on EJ populations related to indirect impacts and cumulative effects.*



7.5 Environmental Justice Finding

In summary, the resource-specific conclusions are:

- **Transit** – no disproportionately high and adverse impacts on EJ populations
- **Parks and Recreation** – no disproportionately high and adverse impacts on EJ populations
- **Displacements of Residences and Businesses** – may have a disproportionately high and adverse impacts on EJ populations
- **Visual/Aesthetics** – no disproportionately high and adverse impacts on EJ populations
- **Noise** – no disproportionately high and adverse impacts on EJ populations
- **Indirect Impacts and Cumulative Effects** – no disproportionately high and adverse impacts on EJ populations

While there would be adverse impacts related to the proposed BLRT Extension project, they would affect both EJ and non-EJ populations proportionately for all resource areas evaluated in this EJ analysis, except for business displacements. As discussed in **Section 7.4.3.3**, there may be a disproportionately high and adverse effect on EJ communities that rely on some of the businesses displaced by the proposed BLRT Extension project. The Council is committed to mitigating these impacts. For these businesses, the Council is committed to providing assistance through its partnerships with project-related groups and local community organizations, which may include the proposed BLRT Extensions project's Business Advisory Committee, Blue Line Coalition, Black Women in Business Alliance, Asian Economic Development Association, among others. For each displaced business impact on a community, the Council and its outreach partners will work with the community to provide information regarding the business' new location, transit options to access the new business location, and/or other options to meet their needs.

Both EJ and non-EJ populations in the study area would also benefit from the proposed BLRT Extension project. The following is a list of the benefits to communities in the proposed BLRT Extension project study area:

- Reliable and higher-capacity service for transit riders
- Improved connectivity and access to transit
- Faster travel times along the proposed BLRT Extension project corridor
- Improved pedestrian and bicycle connections and access, particularly in the vicinity of proposed BLRT Extension stations
- Improved access to employment, educational, recreational, shopping, and cultural opportunities
- Improved overall health of the users of the proposed BLRT Extension project with improvements to the parks' trail system, grade-separated crossings, and other safety improvements.



Project-wide Environmental Justice Finding: The Council and FTA recognize that some of the specific impacts of the proposed BLRT Extension project may adversely affect both EJ and non-EJ populations, and additional outreach and coordination with community organizations and the Station Area Planning teams would be necessary to maintain continued engagement with EJ populations as the proposed BLRT Extension project advances. The Council is committed to continued engagement with the Blue Line Coalition which has two voting members on the proposed BLRT Extension project Corridor Management Committee (CMC), and continued engagement with the Business or Community Advisory Committees which are integral to project decision-making.

The Blue Line Coalition members on the CMC voted to approve the revised proposed BLRT Extension project scope and cost estimate. The Blue Line Coalition also issued a resolution supporting the general direction of the design for the proposed BLRT Extension project on November 12, 2015 (see [Appendix D – Agency Coordination](#)). This resolution supported the general direction for design of the proposed BLRT Extension project acknowledging its potential to connect low- and moderate-income populations and communities of color to regional opportunities, expand access to needed services, and its potential to spur development and economic growth to reduce disparities along the proposed BLRT Extension project corridor.

After examining the proposed BLRT Extension project holistically, taking into account the adverse impacts on EJ populations, committed mitigation measures, and benefits to EJ populations, the Council and FTA have concluded that the proposed BLRT Extension project *will not result in disproportionately high and adverse impacts to EJ populations project-wide.*



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