



7 Environmental Justice and the Justice40 Initiative

Below is a summary comparing the impacts and mitigation in the 2016 Alignment with the Project Alignment.

Table 7-1 Comparison of Impacts and Mitigation - 2016 Alignment and Project Alignment

Resource	Did FEIS/ROD Identify an Impact and Mitigation?	Do the Proposed Modifications Change the Impacts to this Resource?	Do the Proposed Modifications Change the Mitigation?	Section Where Additional Information can be Found
Environmental Justice	Yes, disproportionately high and adverse effects due to displacements of 5 businesses mitigated through the Uniform Act and continued outreach to environmental justice populations.	Increased impacts due to displacement of community facilities, businesses and residents, and noise impacts and adverse effects on community character.	Yes, mitigation measures will be developed in coordination with affected environmental justice communities and reflected in the Supplemental Final EIS.	7.4

This chapter describes the Project’s compliance with applicable federal requirements for EJ and the Justice40 Initiative, which seeks to address decades of underinvestment in disadvantaged communities. This chapter includes the Council’s review of the regulatory context and methodology; identification of BIPOC¹ and low-income populations (collectively, EJ communities) and disadvantaged communities. A summary of the public outreach strategies that engaged EJ communities and disadvantaged communities in the Project planning process is also provided along with feedback received. An initial assessment of potential impacts and mitigation measures that would occur in EJ areas is provided. This chapter also addresses how the Project supports the key objectives of the Justice40 Initiative, which are to increase affordable transportation options that connect people to jobs, fight climate change, and improve access to resources and quality of life in communities.

7.1 Regulatory Context

This section describes the context and methodology used to identify EJ communities, assess Project-related impacts and benefits, and determine whether disproportionately high and adverse effects on EJ communities would result from Project implementation. This section also reviews the context and methodology used to identify disadvantaged communities in accordance with Justice40 Initiative interim guidance.

7.1.1 Environmental Justice

The analyses presented in this chapter were prepared in compliance with Presidential Executive Order (EO) 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* (Feb. 11, 1994); FTA’s Circular FTA C 4703.1, *Environmental Justice Policy Guidance for Federal Transit Administration Recipient* (July 17, 2012); USDOT’s *Order to Address Environmental Justice in Minority Populations and Low-Income Populations* (USDOT Order 5610.2(c), May 16, 2021); CEQ’s *Environmental Justice Guidance Under the National Environmental Policy Act* (December 1997); and EO 14096, *Revitalizing Our Nation’s Commitment to Environmental Justice for All* (April 2023).



7.1.1.1 Executive Order 12898

EO 12898 requires each federal agency to “make achieving EJ part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human-health or environmental effects of its programs, policies, and activities on minority populations and low-income populations.” It also directs federal agencies to develop agency-wide EJ strategies to implement EJ requirements; avoid disproportionately high and adverse effects; ensure the full and fair participation by all potentially affected communities; and prevent the denial of, reduction in, or significant delay in the receipt of benefits by EJ communities.

7.1.1.2 FTA C 4703.1

As outlined in FTA C 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 EJ communities. FTA includes incorporation of EJ and non-discrimination principles into transportation planning and decision-making processes and project-specific environmental reviews.

7.1.1.3 USDOT Order 5610.2(c)

USDOT Order 5610.2(c) is a guidance document that updates the policies and procedures for addressing EJ in USDOT programs, activities, and services from previous iterations, which are USDOT Order 5610.2, USDOT Order 5610.2(a), and USDOT Order 5610.2(b). The previous orders established policies and procedures for ensuring nondiscrimination in USDOT programs and activities and compliance with Title VI of the Civil Rights Act of 1964 and EO 12898. The updated and revised Order 5610.2(c) 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. The order ensures fair treatment and meaningful involvement of all people, regardless of race, ethnicity, income, national origin, or educational level, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.

7.1.1.4 CEQ EJ Guidance under NEPA

The CEQ guidance includes six principles for EJ analysis to determine any disproportionately high and adverse human-health or environmental effects to low-income and BIPOC, and tribal populations and provides guidance on the identification of EJ communities using reference geographies.

7.1.1.5 EO 14096

EO 14096 reaffirms EO 12898 on EJ and highlights the need for advancing EJ by implementing and enforcing environmental and civil-rights laws, addressing climate change, preventing pollution, and cleaning up legacy pollution. This EO prioritizes an equitable and inclusive economy that provides workforce training, jobs, and access to nature. The EO also emphasizes the importance of engaging and collaborating with disadvantaged communities to address adverse conditions and ensuring that they do not face additional disproportionate burdens or underinvestment. EO 14096 expands on the definition of EJ communities used in EO 12898 to include not just low-income and BIPOC populations, but also those geographies that have a significant proportion of people who have low incomes or are otherwise adversely impacted by persistent poverty or inequality. EJ communities include urban and rural areas and areas within the boundaries of tribal nations and United States territories, and geographically dispersed and mobile populations, such as migrant farmworkers. EO 14096 also discusses the legacy of racial discrimination and segregation, redlining, exclusionary zoning, and other discriminatory land use decisions or patterns as the source of EJ concerns for various communities. Some examples of these harmful legacy decisions include placement of polluting industries, hazardous-waste sites, landfill locations, and the routing of highways and other transportation corridors in ways that divide neighborhoods.



7.1.1.6 EO 13045

EO 13045, *Protection of Children from Environmental Health Risks and Safety Risks*, directs each federal agency to prioritize assessing environmental health and safety risks that may disproportionately affect children and ensure that policies, programs, activities, and standards address these risks. The EO defines environmental health and safety risks as those that “are attributable to products or substances that the child is likely to come in contact with or ingest (such as the air we breathe, the food we eat, the water we drink or use for recreation, the soil we live on, and the products we use or are exposed to).”

7.1.2 Justice40 Initiative

The Justice40 Initiative, established as a requirement of Section 223 of EO 14008, *Tackling the Climate Crisis at Home and Abroad* (January 2021), is a federal government effort to deliver at least 40 percent of the overall benefits from certain federal investments to disadvantaged communities that are marginalized, underserved, and overburdened by pollution. The Justice40 Initiative’s investment areas, including clean energy, energy efficiency, and clean transit, are especially relevant in the context of transportation, where Justice40 provides an opportunity to address gaps in transportation infrastructure and public services.

Through Justice40, USDOT identifies and prioritizes projects that benefit rural, suburban, tribal, and urban communities facing barriers to affordable, equitable, reliable, and safe transportation. USDOT seeks to advance projects that will create proportional impacts to all populations in a project area, remove transportation-related disparities, and increase equitable access to project benefits, consistent with EO 13985, *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government* (January 2021) and EO 14091, *Further Advancing Racial Equality and Support for Underserved Communities Through the Federal Government* (February 2023). USDOT also seeks to award projects that address equity and EJ issues, particularly for communities that have experienced decades of underinvestment and are most impacted by climate change, pollution, and environmental hazards, consistent with EO 14096. Through Justice40, USDOT will also assess the negative impacts of transportation projects and systems on disadvantaged communities and will consider whether meaningful public involvement is taking place throughout a project’s life cycle.

To support Justice40, CEQ was directed to develop a new tool, called the Climate and Economic Justice Screening Tool (CEJST), to identify disadvantaged or underserved communities in the United States. The tool has an interactive map and uses data sets that are indicators of burdens in eight categories—climate change, energy, health, housing, legacy pollution, transportation, water and wastewater, and workforce development—which collectively define the disadvantaged communities. To respect tribal sovereignty and self-government and to fulfill federal trust and treaty responsibilities to tribal nations, land within the boundaries of Federally Recognized Tribes is designated as disadvantaged on the map.

Designed to complement the CEJST, USDOT’s Equitable Transportation Community (ETC) Explorer is an interactive web application that uses 2020 census tracts and data to explore the cumulative burden that communities experience as a result of underinvestment in transportation in the following five components: Transportation Insecurity, Climate and Disaster Risk Burden, Environmental Burden, Health Vulnerability, and Social Vulnerability.



7.2 Methodology

This section describes the methodology used to identify EJ communities, , and disadvantaged communities; assess benefits and adverse effects; and avoid, minimize, or mitigate any disproportionately high and adverse effects on EJ communities in accordance with relevant guidance:

1. **Identify EJ and disadvantaged communities:** Collect recent data on race, ethnicity, national origin, income, tribal governments, and seasonal and migrant workers in a study area that considers the potential for direct and indirect impacts related to the Project and apply FTA methodology to identify EJ communities. Use the CEJST and USDOT ETC Explorer tool to identify disadvantaged communities. Describe how the disadvantaged communities have been affected by lack of transportation investments and options and/or harmed by past transportation decision making.
2. **Solicit input from EJ communities:** Through targeted outreach to potentially affected low-income and BIPOC populations, identify transportation needs and concerns about the Project to inform Steps 3, 4, and 5.
3. **Evaluate adverse and beneficial effects:** Analyze whether the Project would create adverse impacts to EJ communities in the near, medium, or long term, and identify measures that would avoid, minimize, or mitigate adverse impacts. Describe the Project benefits, who would receive them, and how the Project's benefits would create positive outcomes that would reverse how a community is experiencing disadvantage through increasing affordable transportation options, improving safety, reducing pollution, improving connections to good-paying jobs, fighting climate change, and/or improving access to resources and quality of life.
4. **Identify disproportionately high and adverse effects:** Determine whether adverse effects are borne predominantly by EJ communities, and if these effects are more or greater than those effects borne by the general population.
5. **Reevaluate mitigation measures:** If adverse effects would be borne predominantly by EJ communities and are more or greater in magnitude than the adverse effect that would be suffered by the general population, consult with the community to identify measures to avoid, minimize, or mitigate the impacts. Determine whether the mitigation measures are practical. Practical mitigation measures are those that are effective and do not create other adverse effects that are more severe; feasible in terms of implementation and operation; and cost effective, while maintaining the financial viability of the project.
6. **Reevaluate disproportionately high and adverse effects and document decision:** If practical mitigation measures have been identified, reevaluate whether adverse effects borne by EJ communities are appreciably more severe or greater than those effects borne by non-EJ communities.

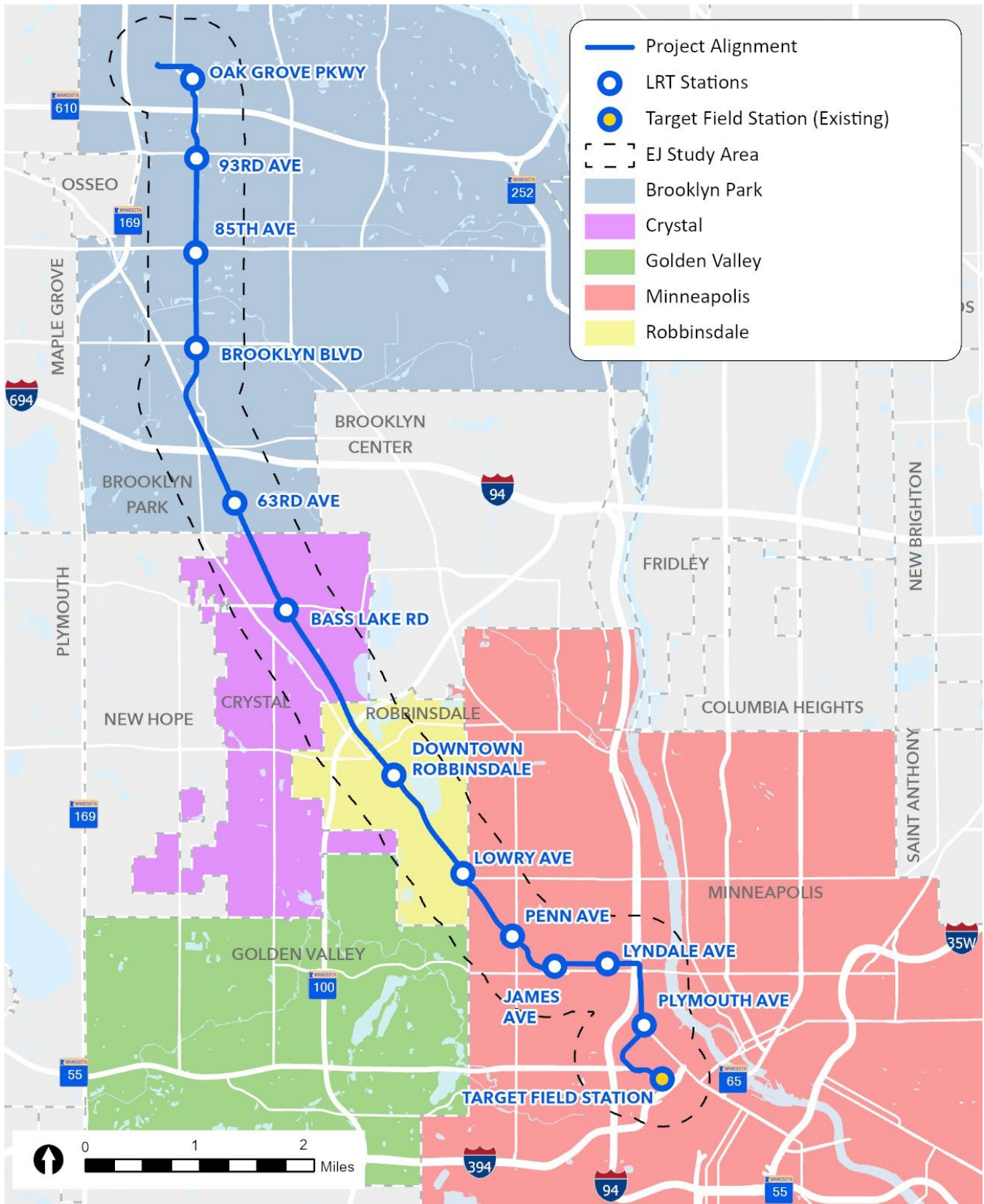
In accordance with USDOT guidance, determinations of disproportionately high and adverse effects include taking into consideration mitigation and enhancement measures and all off setting benefits to the affected EJ communities, and the relevant number of similar existing system elements in non-EJ communities. If mitigation is not possible, FTA encourages grantees to involve the EJ community in identifying acceptable alternatives, such as betterments or enhancements to the community.²

7.2.1 Identification of Low-Income and BIPOC Populations (EJ Communities)

To identify low-income and BIPOC populations, data were collected for all census tract block groups or blocks, depending on census data availability, which lie completely or partially within the EJ study area. The EJ study area is defined by a one-half-mile buffer around the Project Alignment³ (see Figure 7-1). To identify disadvantaged communities, census tracts that are identified as overburdened and underserved in the Justice40 CEJST and USDOT ETC Explorer tools and lie completely or partially within the EJ study area were mapped.



Figure 7-1 EJ Study Area





In addition to the use of census data, the Council identified the presence of BIPOC and/or low-income populations in the EJ study area through an extensive public engagement process (see Section 7.3). This engagement started with the development of the Draft EIS for the 2016 Alignment, continued through the route modification process, and will continue through the environmental phase of the Project. More details about the public outreach and engagement process and phases for this Project are available in Chapter 9.

7.2.1.1 Identification of Low-Income Populations

As defined in FTA C 4703.1, a low-income population means any readily identifiable group of low-income persons who live in geographic proximity and, if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who would be similarly affected by a proposed FTA program, policy, or activity. Given direction from FTA staff for this Project, low-income is defined as individuals whose income is equal to or less than 200 percent of the federal poverty level for the year 2021.⁴

Guided by MnDOT’s Transportation Project Development Process (TPDP) EJ methodology⁵ the Council identified low-income EJ communities by establishing a threshold to identify census block groups for which the concentration of low-income persons is meaningfully greater as compared to the percentage of Hennepin County households meeting the low-income definitions. “Meaningfully greater” is defined in the TPDP as 10 percentage points or higher than the Hennepin County percentage of low-income population, which is 20 percent.⁶ Therefore, a 30 percent low-income threshold is used in this analysis. Census block groups with a low-income population greater than 30 percent were identified as EJ populations. Year 2021 U.S. Census American Community Survey (ACS) 5-year estimate data were used to quantify low-income communities in the EJ study area at the block group level.

In general, the EJ study area has a high percentage of low-income individuals, those whose income is equal to or less than 200 percent of the federal poverty level for the year 2021,⁷ as compared to the Hennepin County, the Twin Cities metropolitan area and the state of Minnesota (see Table 7-2).

Table 7-2 Low-Income Populations in the Study Area

Geography	2021 Total Population	2021 Percentage Low-Income Population
Study Area	26,174	37.27%
Reference Geographies		
City of Brooklyn Park	85,247	25.7%
City of Crystal	23,143	18.3%
City of Robbinsdale	14,522	26.2%
City of Minneapolis	425,091	33.2%
Hennepin County	1,270,283	20.1%
Twin Cities metropolitan area	3,136,376	21.6%
Minnesota	5,670,472	22.7%

Source: U.S. Census ACS 5-Year Estimate (2017–2021); Esri Demographics (2022).



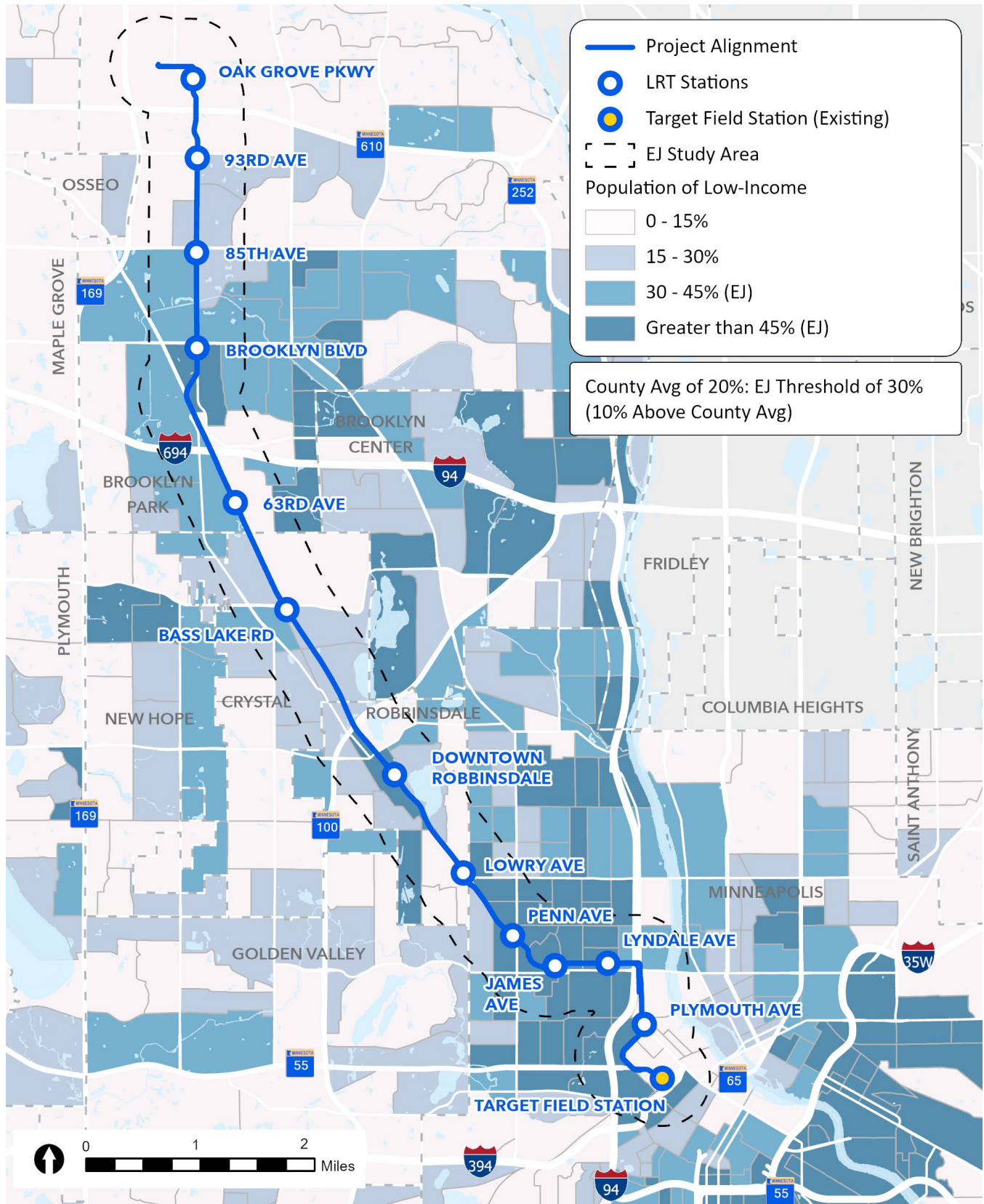
The spatial distribution of low-income EJ populations (those block groups that exceed the 30 percent low-income EJ threshold) is shown in Figure 7-2. Low-income EJ populations are present throughout the Project area and in all cities along it, with a higher percentage around the station areas of Brooklyn Blvd, City of Robbinsdale downtown area, and Lowry Ave. Within the City of Minneapolis, low-income populations are relatively evenly dispersed on both sides of the Project area but located primarily on the west side of I-94.

In addition to low-income populations identified through census analysis, an unhoused population resides in Hennepin County, which includes youth experiencing homelessness. However, no homeless encampments have been identified in the EJ study area at the time of publication.

Locations of income-restricted housing also help to identify where low-income populations live at a more granular level than census analysis provides. As a part of the Anti-Displacement Working Group (ADWG) process, Hennepin County assessed locations of housing subsidized by the federal government and the State and local programs that maintain units with affordable rents as well as the use of housing choice vouchers in the EJ study area (see Figure 7-3 and Figure 7-4). As described in the Blue Line Extension Anti-Displacement Recommendations report prepared by CURA for Hennepin County, subsidized housing is more densely located in the City of Minneapolis with relatively small developments (1 to 19 units), while the City of Crystal has several larger subsidized housing developments. The Cities of Robbinsdale and Brooklyn Park have much lower concentrations of subsidized housing units. Use of housing choice vouchers is more concentrated in the Cities of Minneapolis and Brooklyn Park than in the Cities of Robbinsdale and Crystal.



Figure 7-2 Low-Income Populations in the Study Area



Source: U.S. Census ACS 5-Year Estimate (2017–2021); Esri Demographics (2022).



Figure 7-3 Subsidized Housing (2020) in the EJ Study Area

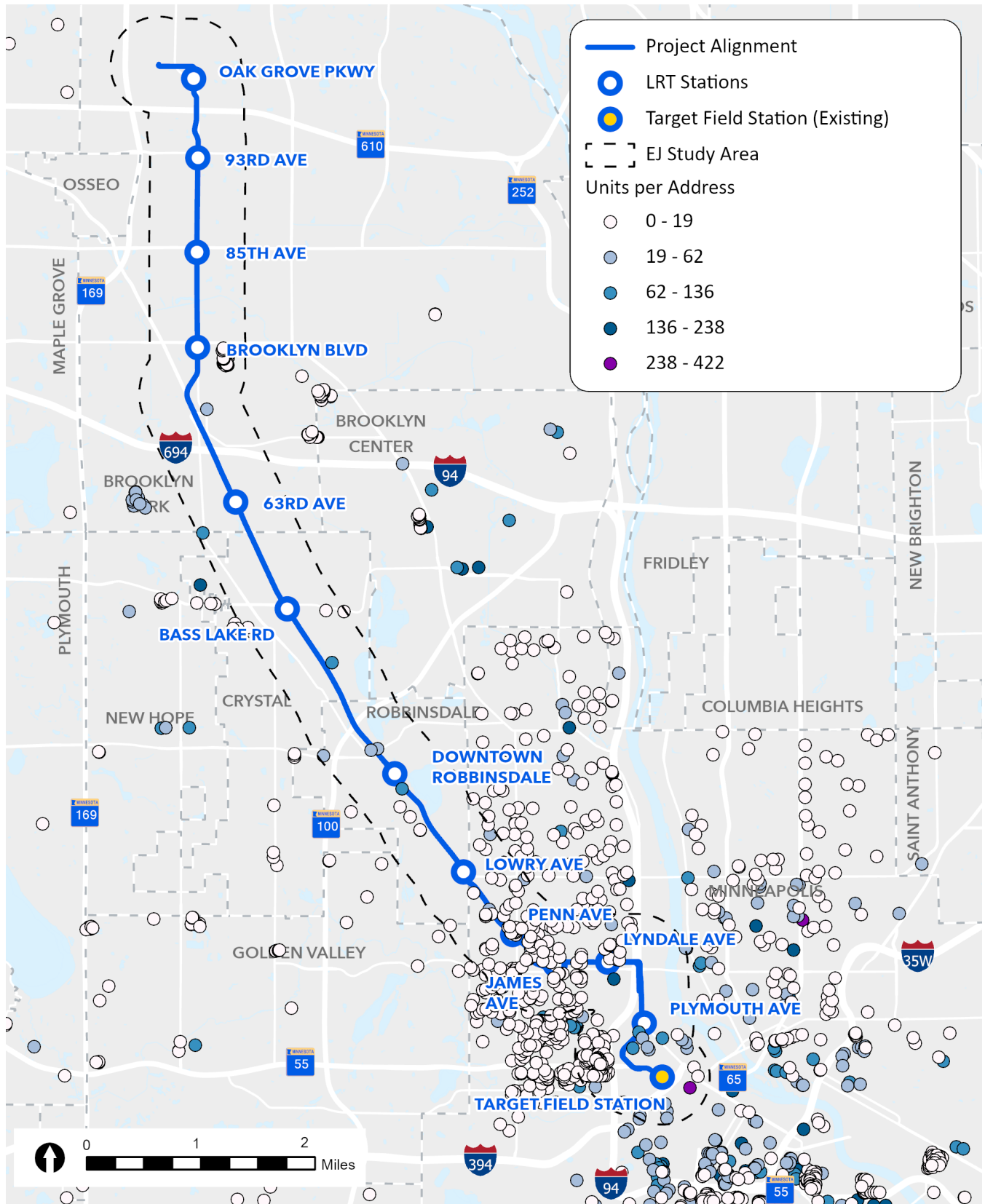
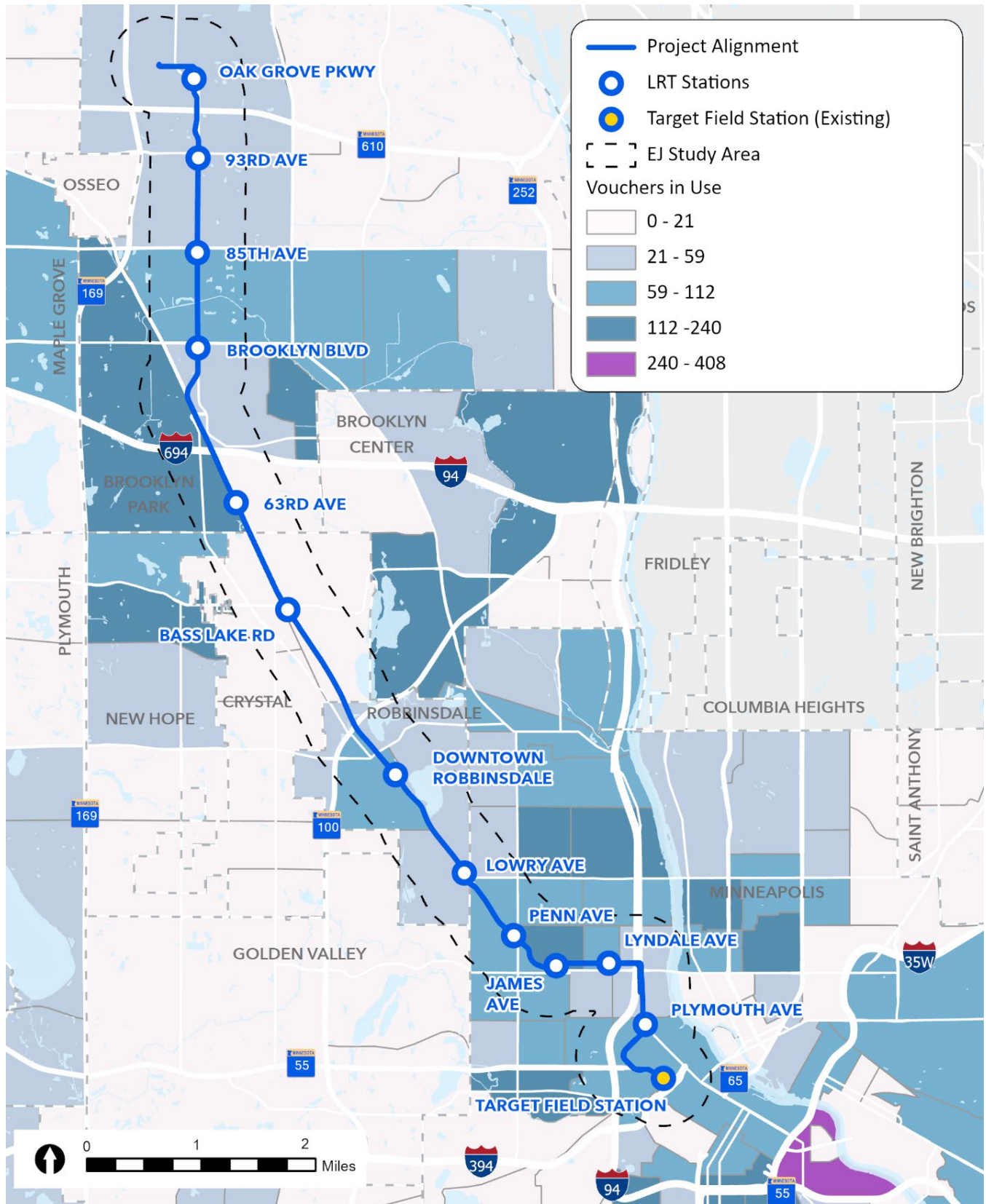




Figure 7-4 Housing Choice Voucher Use (2021) in the EJ Study Area





7.2.1.2 Identification of BIPOC Populations in the EJ Study Area

As defined in FTA C 4703.1, a BIPOC population is any readily identifiable group or groups of BIPOC persons who live in geographic proximity, and if circumstances warrant, geographically dispersed or transient persons such as migrant workers or Native Americans who would be similarly affected by a proposed USDOT program, policy, or activity. BIPOC persons include (1) Black: a person having origins in any of the Black racial groups of Africa; (2) Hispanic or Latino: a person of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race; (3) Asian American: a person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent; (4) American Indian and Alaskan Native: a person having origins in any of the original people of North America or South America (including Central America), and who maintains cultural identification through tribal affiliation or community recognition; or (5) Native Hawaiian and Other Pacific Islander: a person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

CEQ guidance indicates that BIPOC populations should be identified where either (1) the BIPOC population of the affected area exceeds 50 percent or (2) the BIPOC population percentage of the affected area is meaningfully greater than the BIPOC population percentage in the general population or other appropriate unit of geographic analysis. For this EJ analysis, a conservative threshold of 45 percent BIPOC population is used, which is 10 percentage points or higher than the BIPOC population threshold of Hennepin County and thus meaningfully greater than the BIPOC population percentage in the general population or other appropriate unit of geographic analysis as outlined in item (2) above (see Table 7-3).⁸

Table 7-3 BIPOC Populations in the EJ Study Area and Reference Geographies

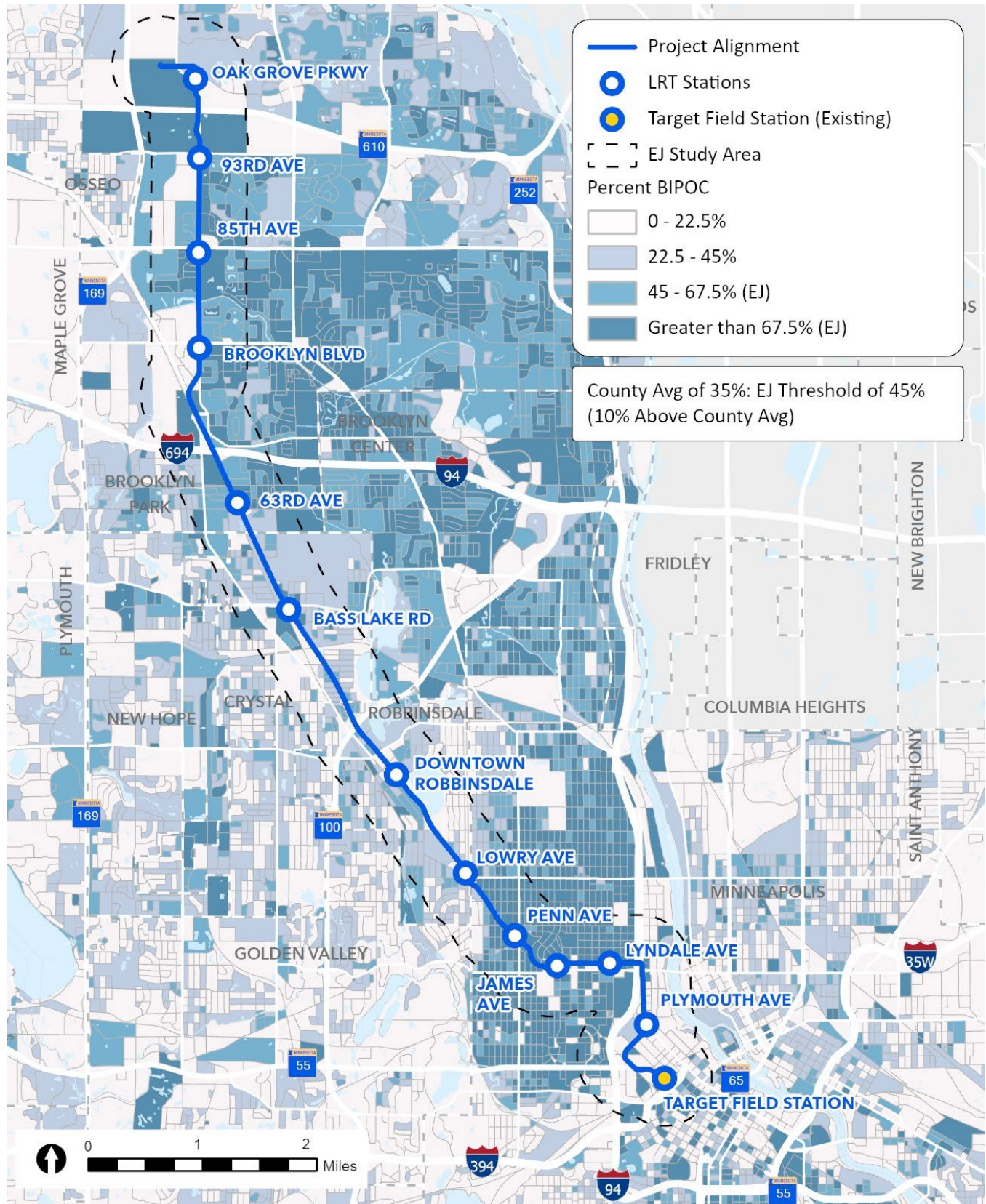
Geography	2020 Total Population	2020 Percent BIPOC Population
Study Area	63,361	60.04%
Reference Geographies		
City of Brooklyn Park	86,478	61.2%
City of Crystal	23,330	33.7%
City of Robbinsdale	14,646	33.0%
City of Minneapolis	429,954	41.9%
Hennepin County	1,281,565	34.4%
Twin Cities metropolitan area	3,163,104	31.2%
Minnesota	5,706,494	23.7%

Source: 2020 Decennial Census.

BIPOC populations are located along the entire Project area (see Figure 7-5). In the cities along the Project Alignment north of the City of Minneapolis, BIPOC populations are distributed more on the east side of the Project area. BIPOC populations are prevalent throughout the study area in the City of Minneapolis except in the area east of I-94.



Figure 7-5 BIPOC Populations in the Study Area



Source: 2020 Decennial Census.



As described in Section 7.3, the Blue Line Extension Engagement Team conducted several rounds of public engagement with targeted outreach to EJ communities. This engagement, and the Blue Line Extension Engagement Team’s resulting knowledge of the Project area and communities and populations surrounding it, led to the identification of more specific locations of BIPOC populations. Table 7-4 summarizes specific BIPOC populations by location identified through the public engagement process. These populations were subsequently engaged through partnership with local organizations and engagement strategies as described in Section 7.3.

Table 7-4 Specific BIPOC Populations by Location

Community	City of Brooklyn Park	City of Crystal	City of Robbinsdale	City of Minneapolis	Notes
Immigrant-owned small businesses, primarily Liberian	✓	✓			
Immigrant and refugee community	✓	✓	✓	✓	
Black/African immigrants	✓	✓	✓	✓	
Black business owners	✓	✓	✓	✓	Especially along W Broadway Ave
Latinx community	✓	✓	✓	✓	
Asian community	✓	✓	✓	✓	
Asian-owned small businesses	✓	✓	✓	✓	
Lao community	✓	✓		✓	
Community members of various racial and ethnic backgrounds	✓	✓	✓	✓	

Source: U.S. Census ACS 5-Year Estimate (2017–2021); Esri Demographics (2022).

EJ communities are comprised of not just those individuals who live in the EJ study area, but also include businesses owned or operated by EJ individuals. They also include important community and cultural resources and destinations, including restaurants, shops, and other businesses that serve EJ communities within the EJ study area. The Blue Line Extension Engagement Team collected input from community groups along the Project area to identify important community and cultural resources and businesses and to gain a more granular understanding of BIPOC populations in the EJ study area. These community and cultural resources include places like grocery stores, and childcare facilities and are shown by city along the Project Alignment (see Chapter 4).

The community and cultural resources shown in the Cities of Brooklyn Park, Crystal, Robbinsdale, and Minneapolis were collected for the African immigrant community and the Asian community in 2021 and are a subset of the community facilities described in Chapter 4. In the City of Minneapolis, additional community and cultural resources were identified through a survey of businesses in the W Broadway Ave business corridor in November 2022 during which the Blue Line Extension Engagement Team asked owners if they identified as an EJ business. Those that indicated “yes” are included in the community and cultural resources information in Chapter 4 along with the locations collected from the African immigrant community and the Asian community in 2021. The W Broadway Ave Business District is particularly important as a hub of Black wealth and commerce and requires detailed consideration in terms of Project impacts and benefits. Additional ongoing outreach in other parts of the Project area will continue to inform locations of EJ businesses.



7.2.1.3 Identification of Households with High Housing Cost Burdens

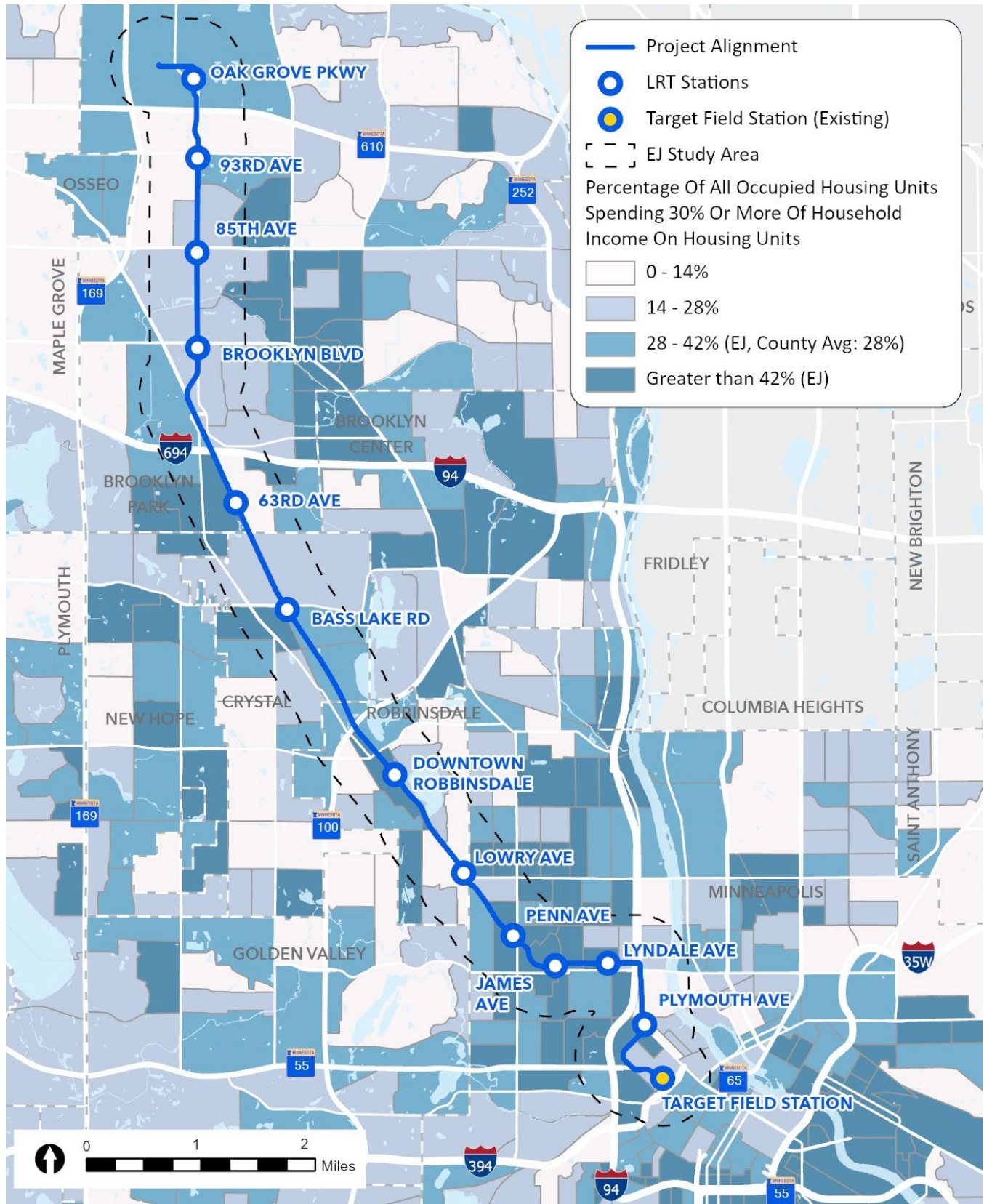
The distribution of high housing cost–burdened households (rented or owned) in the EJ study area is shown on Figure 7-6. Approximately 69 percent of the households in the study area are considered high housing cost–burdened, meaning that they spend 30 percent or more of their household income on housing as defined by the U.S. Census.⁹ High cost-burdened households are present throughout the EJ study area and are concentrated around the Oak Grove Pkwy Station; the 63rd Ave N Station; the Downtown Robbinsdale Station; and along much of the Project Alignment in the City of Minneapolis, particularly around the Penn Ave, James Ave, and Lyndale Ave Stations. While the majority of households in the EJ study area are burdened by housing costs, renters are more heavily burdened by housing costs than households who own their homes.¹⁰

7.2.1.4 Identification of Population with Limited English-Speaking Abilities

The distribution of population with limited English-speaking abilities in the EJ study area is shown on Figure 7-7. Individuals with limited English proficiency compose around 5 percent of the households in the EJ study area, which is a higher rate than local, regional, and state reference geographies. Populations with limited English proficiency are concentrated south of the Brooklyn Blvd Station, the Bass Lake Rd Station, the Downtown Robbinsdale Station, and along much of the Project Alignment in the City of Minneapolis, particularly adjacent to the James Ave and Lyndale Ave Stations.



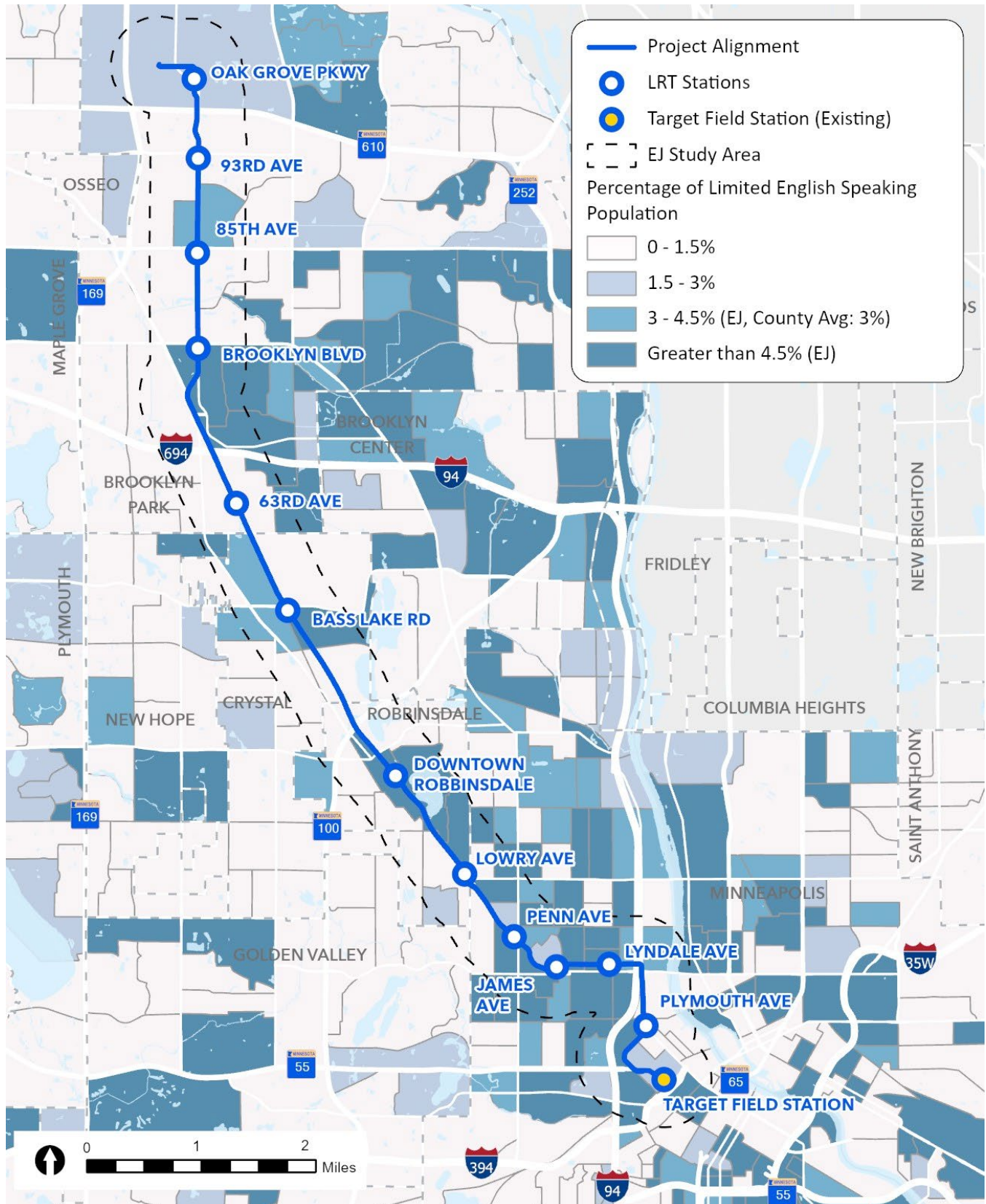
Figure 7-6 Households with High Housing Cost Burden in the Study Area



Source: U.S. Census ACS 5-Year Estimate (2017–2021); Esri Demographics (2022).



Figure 7-7 Limited English Proficiency Populations in the Study Area





7.2.2 Identification of Disadvantaged Communities in the EJ Study Area

Disadvantaged communities were identified in the EJ study area using the Justice40 CEJST and USDOT ETC Explorer screening tools. The disadvantaged areas identified by the CEJST and ETC Explorer tools are also designated as Transportation Equity Priority (TEP) Areas by the City of Minneapolis.¹¹ The City of Minneapolis TEP Areas are determined at the census tract level using a five-tiered ranking system that considers race, income, lack of concentrated affluence, vehicle availability, commute times, land temperature, and population density. The City of Minneapolis uses TEP Areas to “help shape investments, infrastructure, operations, maintenance or other transportation work and decisions citywide.”

7.2.2.1 Justice40 CEJST Disadvantaged Communities

The census tracts identified in the Justice40 tool¹² are shown in Figure 7-8. The tool highlights disadvantaged communities across all 50 states, the District of Columbia, and the United States territories. Communities are considered disadvantaged if they are in census tracts that meet the thresholds for at least one of the tool’s categories of burden (climate change, energy, health, housing, legacy pollution, transportation, water and wastewater, and workforce development) or if they are on land within the boundaries of Federally Recognized Tribes.¹³

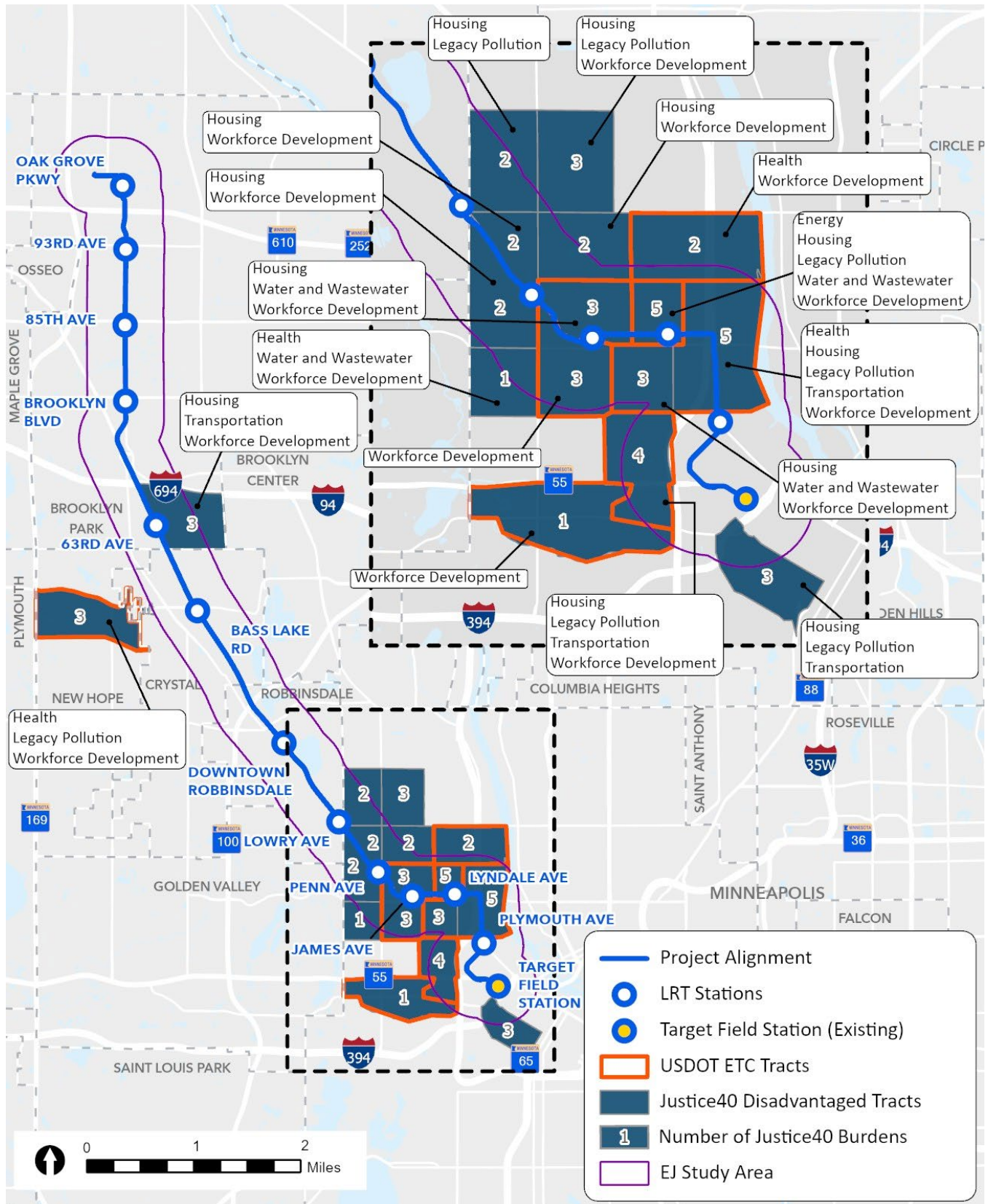
There are a total of 39 census tracts within the EJ study area and 17 (44 percent) of them are identified as disadvantaged by the Justice40 tool. Of the total 17 disadvantaged tracts, 15 are in the City of Minneapolis, concentrated in the southern end of the EJ study area. The remaining two disadvantaged tracts are located in the Cities of Brooklyn Park and New Hope. These census tracts exceed thresholds for one or more of the following burdens (see Figure 7-8):

- **Energy:** are at or above the 90th percentile for energy cost or particulate matter equal to or less than 2.5 microns in diameter (PM_{2.5}) in the air and are at or above the 65th percentile for low income
- **Health:** are at or above the 90th percentile for asthma, diabetes, heart disease, or low life expectancy and are at or above the 65th percentile for low income
- **Housing:** have experienced historical underinvestment or are at or above the 90th percentile for housing cost, lack of green space, lack of indoor plumbing, or lead paint and are at or above the 65th percentile for low income
- **Legacy pollution:** have at least one abandoned mine land or Formerly Used Defense Sites or are at or above the 90th percentile for proximity to hazardous waste facilities, proximity to Superfund sites (National Priorities List [NPL]), or proximity to Risk Management Plan (RMP) facilities and are at or above the 65th percentile for low income
- **Transportation:** are at or above the 90th percentile for diesel particulate matter exposure, transportation barriers, or traffic proximity and volume and are at or above the 65th percentile for low income
- **Water and wastewater:** are at or above the 90th percentile for USTs and releases or wastewater discharge and at or above the 65th percentile for low income
- **Workforce development:** are at or above the 90th percentile for linguistic isolation, low median income, poverty, or unemployment and have more than 10 percent of people ages 25 years or older whose high school education is less than a high school diploma

The EJ study area does not contain any land within the boundaries of Federally Recognized Tribes.



Figure 7-8 Disadvantaged Communities in the EJ Study Area





7.2.2.2 USDOT ETC Explorer Disadvantaged Communities

The USDOT ETC Explorer provides additional information about disadvantaged communities that are experiencing transportation disadvantage and transportation insecurity. The five components—Transportation Insecurity, Health Vulnerability, Environmental Burden, Social Vulnerability, and Climate and Disaster Risk Burden—are calculated by summing the ranked normalized indicators for each component. The result is a composite score for each component. USDOT considers a census tract to be experiencing disadvantage if the overall index score places it in the 65th percentile (or higher) of all U.S. census tracts. The 65th percentile cutoff was chosen for consistency with CEJST, which prioritizes tracts at the 65th percentile or above for CEJST’s low-income indicator and was verified as the appropriate cutoff for the ETC Explorer through sensitivity analyses.

The census tracts identified in the ETC tool as transportation-disadvantaged are shown above in Figure 7-8. Of the 39 census tracts that intersect with the EJ study area, eight tracts (20 percent) are identified as disadvantaged by the ETC tool. Of the total eight disadvantaged tracts, seven are in the City of Minneapolis, concentrated in the southern end of the EJ study area. Notable burdens identified in the ETC tool for the eight census tracts compared to national averages include the following:

- **Transportation cost burden:** 80th percentile ranking
- **Housing cost burden:** 87th percentile ranking
- **Environmental burden:** 87th percentile ranking
- **Social vulnerability:** 90th percentile ranking
- **Asthma prevalence:** 73rd percentile ranking
- **200 percent poverty line:** 91st percentile ranking
- **Unemployment:** 81st percentile ranking
- **Limited English proficiency:** 81st percentile ranking

7.2.2.3 Description of Past Harms

Geographically, certain communities in the City of Minneapolis have a history of disinvestment, discriminatory policies, and transportation decision making that has harmed EJ communities. Past harms are acknowledged in the *City of Minneapolis Racial Equity Framework for Transportation* (March 2023)¹⁴ and include:

- **Redlining:** divestment of North Minneapolis, permitting of industrial uses in communities with majority BIPOC populations through systems such as the Home Owner’s Loan Corporation (HOLC) map (i.e., redlining)
- **Racial covenants:** restrictive clauses that prevented BIPOC households from accessing homeownership opportunities
- **Land acknowledgements:** Dakota land and genocide of Indigenous Peoples, slavery, and colonization
- **Freeway development:** the development of the highway and interstate system through North Minneapolis, which resulted in the displacement of residents and businesses and the removal of entire neighborhoods

Redlining

BIPOC communities have historically experienced disinvestment in the Project area and within the Twin Cities metropolitan area as a region, particularly related to property ownership. Redlining was a practice spurred by the federally funded HOLC in the early 20th century. North Minneapolis was especially affected by the practice, and as a result did not receive the same level of economic investment as neighborhoods in other parts of the City of Minneapolis with higher concentrations of white residents (see Figure 7-9). Redlining involved classification of neighborhoods in major U.S. cities into levels of “desirability” based largely on the proportion of white residents: neighborhoods where white residents dominated were assigned favorable classifications, and neighborhoods with concentrations of people of color and Jewish residents were assigned “declining” or “hazardous” classifications (demarcated by yellow and red lines on maps). Many banks used the HOLC classifications to justify the denial of housing loans and homeowners’ insurance to residents in “declining and hazardous” neighborhoods, resulting in



inequitable rates of home ownership and wealth. Legislation in 1968¹⁵ and 1977¹⁶ forced increased transparency in lending, which brought an end to the use of HOLC neighborhood classifications.

Racial Covenants

Racially restrictive covenants were clauses written into the deeds of homes and property that forbade the sale of the property to some or all nonwhite racial groups, explicitly barring BIPOC residents from owning certain properties based on race. Homes with racially restrictive covenants were often appraised and sold at higher prices than similar homes without these restrictive covenants. The practice of drafting and enforcing racially restrictive covenants was outlawed in 1948, but the discriminatory language remains in many property deeds today. The Mapping Prejudice Project¹⁷ at the University of Minnesota reports that, on average, homes in the Twin Cities metropolitan area that historically had an enforceable racially restrictive covenant still retain 14 percent higher value over homes that did not have racial covenants.¹⁸ Some concentrations of homes with historically enforceable racial covenants are located along the Project Alignment in the Cities of Robbinsdale and Crystal (see Figure 7-10).

Land Acknowledgements

Minnesota was home to Dakota communities for countless generations. In 1851, Dakota chiefs were forced to sign a treaty and cede all land in Minnesota except for two strips of land on both sides of the Minnesota River. Following the Dakota War of 1862, the State proclaimed all Dakota people illegal within its boundaries and enforced extermination policies. Today, there remain four federally recognized Dakota tribal oyate (nations): the Shakopee Mdewakanton, Prairie Island Indian Community, Upper Sioux Community, and Lower Sioux Indian Community. About 4,000 Dakota people reside in Minnesota, with only an estimated 8 fluent speakers of the Minnesota Dakota language remaining.¹⁹ The long history of systemic oppression is still felt today, as thousands of Dakota remain as refugees and Dakota communities in Minnesota have high rates of substance abuse, mental-health disorders and incarceration, and low rates of high school graduation.

Freeway Development

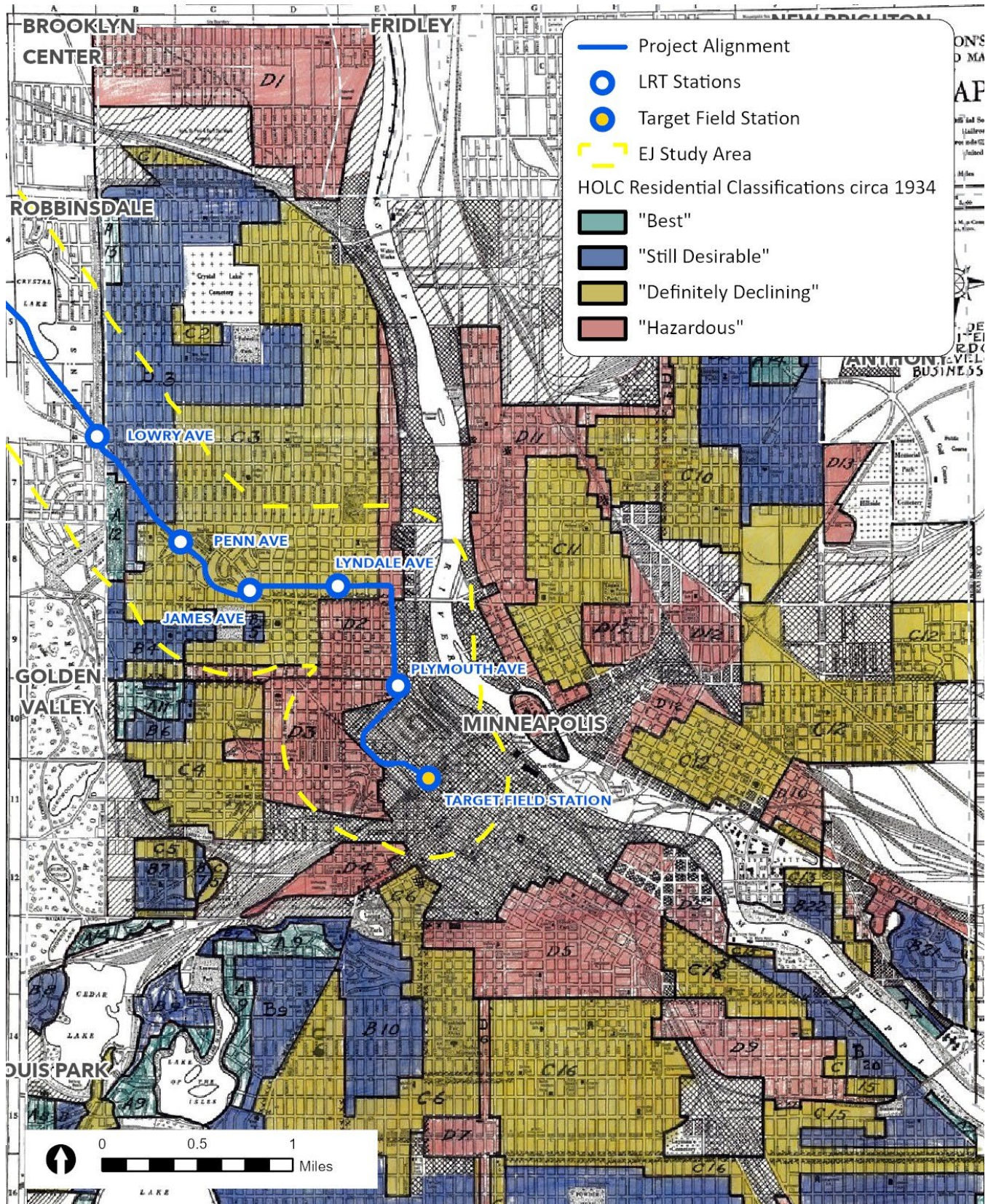
Past transportation decisions contribute to the harm experienced by EJ communities and disadvantaged communities located in the EJ study area. I-94 in the Twin Cities Metropolitan Area was constructed in the 1960s. While the new interstate successfully connected the major Cities of Minneapolis and St. Paul, like many interstate projects in urbanized areas it was constructed through impoverished neighborhoods or neighborhoods without political power. As a result, many homes and businesses were removed and neighborhoods along I-94 became disconnected.²⁰

TH 55 and CR 81 have similar histories, as noted by community groups and residents during Project-related outreach (see Section 7.3). TH 55 is a six-lane highway that divides the Near North and Harrison neighborhoods in the City of Minneapolis. The speed limit on the highway is 40 mph, crossing locations are poorly regulated, and it is identified as a high-injury crash street. The intersection of Lyndale Ave N and TH 55 has the highest crash rate in all of the City of Minneapolis. The construction of the highway divided a thriving Black and Jewish cultural community along 6th Ave N that was home to dozens of homes, shops, businesses, and music venues. The community is advocating for much-needed traffic safety improvements along TH 55,²¹ which would have been implemented as part of the 2016 Alignment.

CR 81, between the Cities of Robbinsdale and Minneapolis border and US 169 in the City of Brooklyn Park, was constructed between the late 1940s and 1950s. According to residents, subsequent roadway improvement projects have required several property acquisitions that have adversely affected the community.



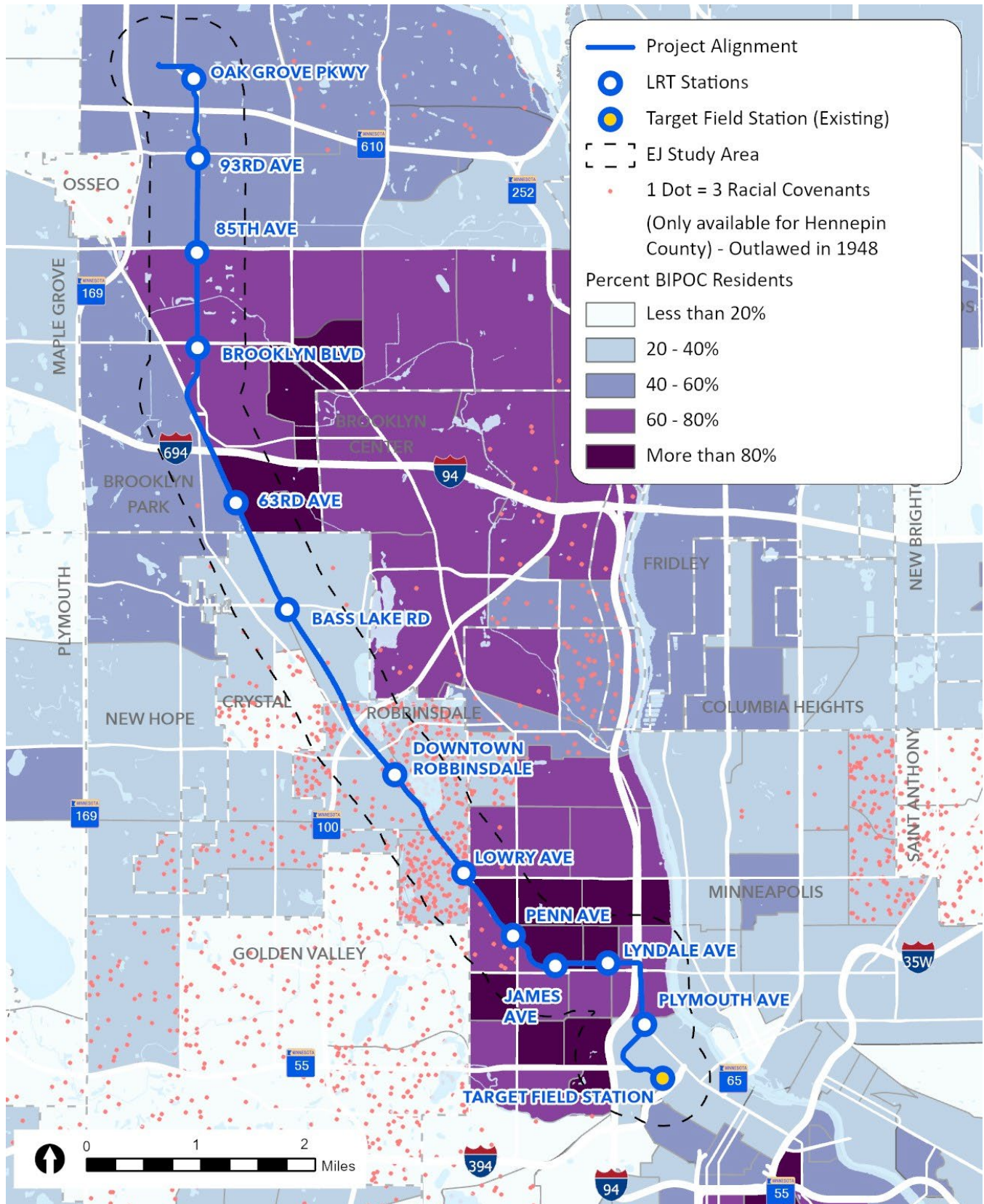
Figure 7-9 Prevalence of Redlining in the Project Area



Source: Metropolitan Council, "Historic Home Owners' Loan Corporation Neighborhood Appraisal Map" (Minnesota Geospatial Commons) (accessed September 2022).



Figure 7-10 BIPOC Residents in the Project Area and Racially Restrictive Covenants in Hennepin County



Source: U.S. Census ACS 2015–2019, University of Minnesota, Metropolitan Council.



7.2.3 Identification of Populations That Rely on Transit

When compared to non-low-income and non-BIPOC populations, more low-income and BIPOC populations rely on transit to meet their basic travel needs. Additionally, those who are too old to drive, are disabled, or who lack access to a car often have few or no mobility options.

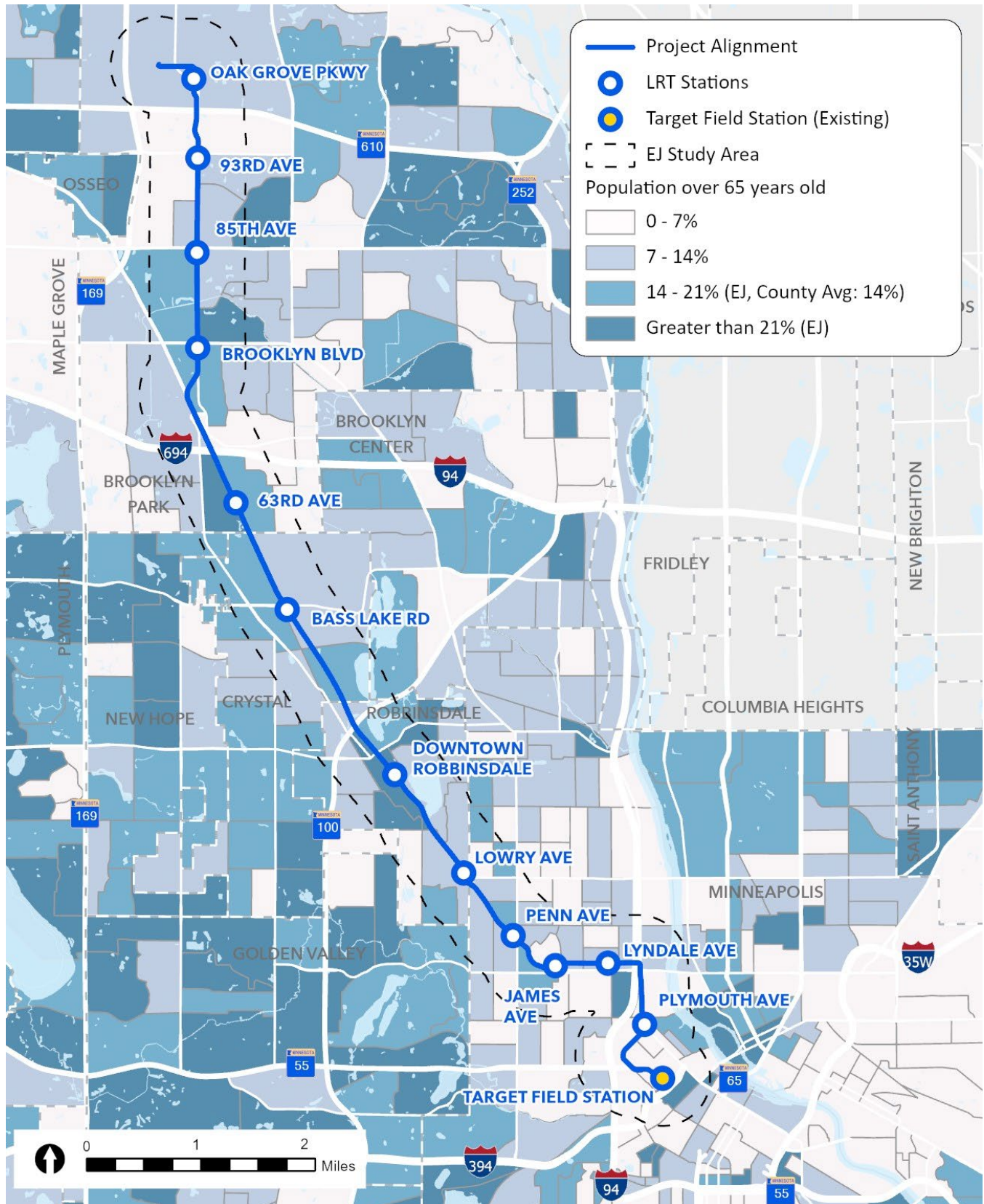
The distribution of seniors (age 65 and above) in the EJ study area is shown on Figure 7-11. Seniors compose approximately 12 percent of the EJ study area population and are present throughout the EJ study area. Areas with higher concentrations of seniors are located east of the 85th Ave N and Brooklyn Blvd Stations, west of the 63rd Ave N Station in the City of Brooklyn Park, and southwest of the Downtown Robbinsdale Station.

The distribution of households with at least one person with a disability in the EJ study area is shown on Figure 7-12. Overall, approximately 26 percent of the households in the EJ study area are home to at least one person with a disability, which is greater than the Hennepin County average (12 percent). Populations with a disability are relatively high adjacent to the Brooklyn Blvd and 63rd Ave N Stations in the City of Brooklyn Park; south of the Downtown Robbinsdale Station; and along much of the Project Alignment in the City of Minneapolis, particularly the Penn Ave, James Ave, and Lyndale Ave Stations.

The distribution of households with no vehicle in the EJ study area is shown on Figure 7-13. Nearly 33 percent of the households in the study area are zero-car households, which is substantially greater than the Hennepin County and State averages. Zero-car households are present throughout the EJ study area and are concentrated to the east of the 93rd Ave N, Brooklyn Blvd, and 63rd Ave N Stations in the City of Brooklyn Park; southwest of the Downtown Robbinsdale Station; and along nearly the entire Project Alignment in the City of Minneapolis.



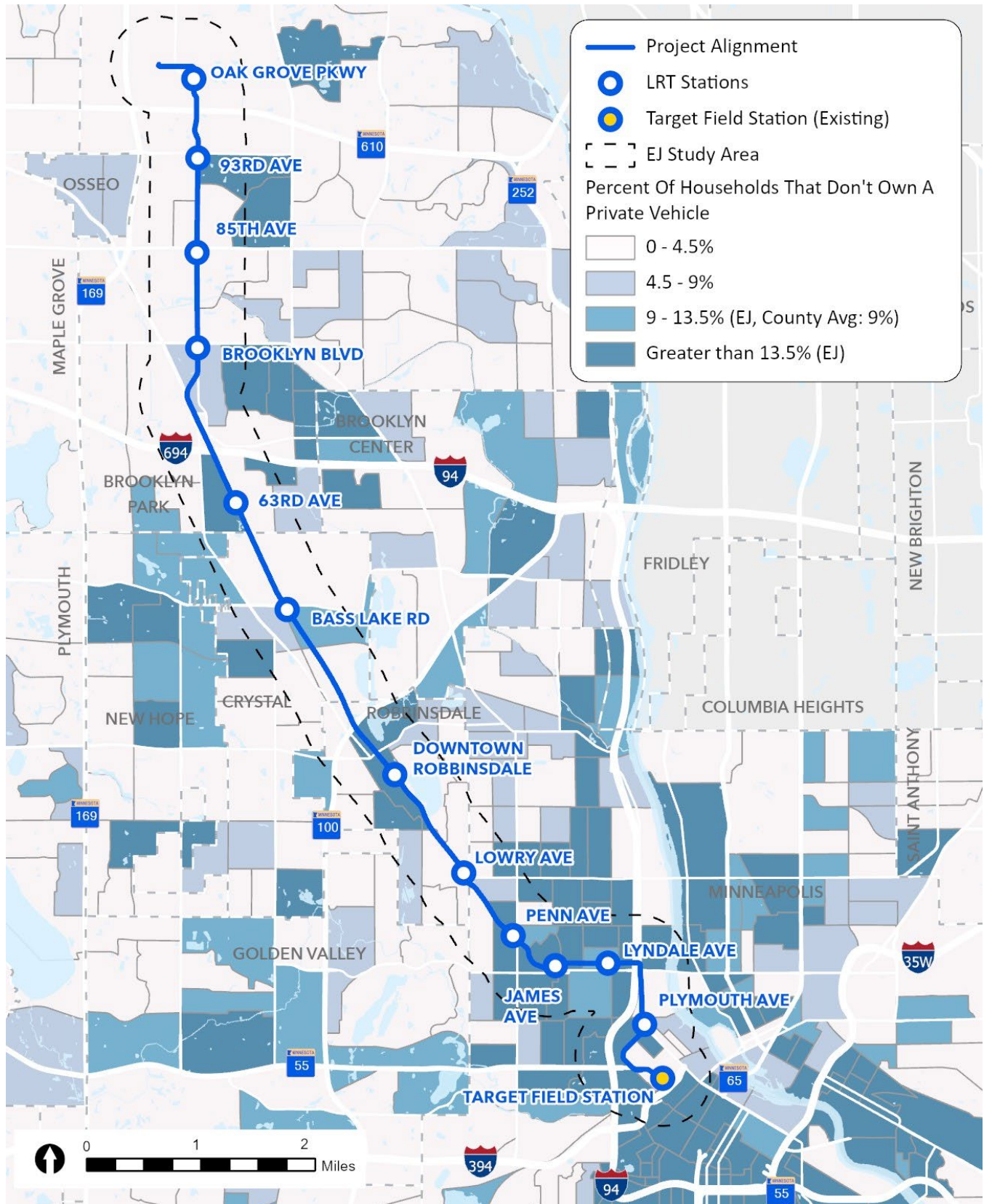
Figure 7-11 Senior Populations (65+) in the EJ Study Area



Source: U.S. Census ACS 5-Year Estimate (2017–2021); Esri Demographics (2022).



Figure 7-13 Households with No Vehicle in the EJ Study Area



Source: U.S. Census ACS 5-Year Estimate (2017–2021); Esri Demographics (2022).



7.3 Public Outreach and Engagement with EJ Communities

To appropriately identify and address EJ concerns related to the Project, the Council conducted substantial outreach and engagement with affected communities over the last several years throughout the Project area. The Project area is defined as the service area for the Project. During the environmental review process for the 2016 Alignment, the Council met with and engaged dozens of community groups and individuals to understand how the Project may affect neighborhoods, families, and individuals along the 2016 Alignment and near LRT stations. Those engagement activities are documented in the EIS published in 2016. Outcomes of this early outreach were valuable in identifying the Build Alternative analyzed in this Supplemental Draft EIS document.

Four alignment options had been identified for analysis as described in Chapter 2 and the Appendix to Chapter 2. These alignment options routed the Project along W Broadway Ave through the W Broadway Ave Business District and down Lyndale Ave in the Lyn Park neighborhood in the City of Minneapolis. Both W Broadway Ave and the Lyn Park neighborhood are important parts of the Black community in the City of Minneapolis, representing concentrations of Black wealth and culture in the City of Minneapolis. Because of concerns regarding potential negative impacts of the Project to these areas and the desire of the community for the Project to not be located along W Broadway Ave and Lyndale Ave, the Project team identified the Build Alternative analyzed in this Supplemental Draft EIS document. A detailed description of alternatives previously considered is presented in Chapter 2.

The Council has continued outreach activities, focusing on EJ communities and disadvantaged communities through the redefinition of the Project and incorporated public comments and concerns into the planning process. To enhance understanding and representation of EJ communities in the study area through the current environmental review process, various engagement strategies and initiatives conducted by the Council since 2020 have identified specific populations and groups of people that are EJ and/or disadvantaged communities. In addition, the issues and benefits that these EJ communities and disadvantaged communities perceive related to the Project were reviewed and incorporated into the EJ impact analysis summarized in Section 7.4.

Through the development of revised Project alternatives during the route modification process that followed the EIS for the Project in 2016, the Blue Line Extension Engagement team worked collaboratively with community members and collected feedback from the community on how the public outreach and engagement process should change and improve moving forward. A full summary of this feedback is available in Chapter 9. Key results from this feedback regarding outreach and engagement with EJ and disadvantaged communities included the following:

- Emphasize low-income people and communities of color by developing culturally specific approaches to engagement.
- Address preventing displacement, recognizing that this is a community priority.
- Select consultants to work together as a cohort coordinating their communications and outreach across their focused communities, complementary services, and areas served.
- Incorporate a communications plan that uses culturally based media for Project communications. EJ populations are less likely to receive Project information shared through standard communications channels and outlets.
- Acknowledge that online surveys can be a useful tool, but they do not reach low-income populations and communities of color as well as other approaches do.
- Move at the speed of trust:
 - Recognize that low-income populations and communities of color have had stressful impacts from COVID-19 and the George Floyd uprising.
 - Refresh and build sustainable, responsive relationships.
 - Use community-trusted communication systems.



This community input led to the development and implementation of the following strategies for engagement that focused on EJ and disadvantaged communities in the route modification phase of the Project starting in 2020.

7.3.1 Engagement Strategies to Reach EJ and Disadvantaged Communities

In addition to more traditional methods like community meetings, door knocking, surveys, and an interactive online map, the Project engagement team designed and employed the following strategies intentionally to reach EJ and disadvantaged communities in the Project area.

7.3.1.1 Community Cohorts

Since 2014, the Blue Line Extension Engagement Team has contracted with local community organizations to carry out engagement activities like community meetings, pop-ups, and driveway talks with their networks. These groups of community organizations, referred to as “Community Cohorts,” have gone through several rounds and iterations of membership and activity since their initiation in 2014. Current Community Cohort members include the following:

- A Mother’s Love
- Asian Media Access Inc.
- Encouraging Leaders
- Juxtaposition Arts
- Lao Assistance Center of Minnesota
- Liberian Business Association
- Pueblos de Lucha y Esperanza
- Northside Economic Opportunity Network
- West Broadway Coalition

Community Cohort member organizations meet regularly to share engagement strategies, report community feedback, and share strategies for further engagement and are a key method for reaching EJ and disadvantaged communities in the Project area.

7.3.1.2 Anti-Displacement Working Group

Following engagement for the route modification process in 2020, the community raised concerns regarding displacement of existing businesses, community members, and culture throughout the Project area. The community member-based ADWG was formed to study and recommend strategies to prevent displacement and to maximize benefits of the Project to area residents and businesses. CURA at the University of Minnesota Twin Cities facilitated the ADWG. CURA solicited applications for ADWG members representative of the communities in the Project area. The ADWG ultimately comprised CURA, Project area community and business representatives, and government and philanthropic representatives for a total of 26 ADWG members.

In addition to monthly public meetings, the ADWG hosted five day-long workshops between May 2022 and February 2023. Each workshop focused on a single topic or activity:

- Lessons from the existing Blue and Green Line LRT projects
- Housing displacement
- Business and cultural displacement
- Compiling recommendations
- Finalizing recommendations



CURA led these workshops and provided qualitative and quantitative research findings. The ADWG developed recommendations related to policies and programs to minimize displacement in the Project area and to maximize benefits of the Project for existing residents and businesses. Input and support from community, government, nonprofit, and philanthropic organizations informed both the workshops and recommendations.²²

The Blue Line Extension Anti-Displacement Recommendations report,²³ published in April 2023, summarizes the work of the ADWG as well as the recommendations generated from this process. The report lists desired outcomes of any anti-displacement strategies—these are not policy recommendations but rather a guiding framework for the outcomes of any anti-displacement strategies that are implemented. The following policies and programs recommended by the ADWG are possible policies that will achieve the recommended outcomes of the ADWG; more details about the outcomes and the listed program and policy recommendations can be found in the Blue Line Extension Anti-Displacement Recommendations report:

- Mandatory relocation assistance
- Tenant opportunity to purchase
- Limiting investor purchasing/corporate ownership
- Land disposition policy
- Right to return
- Rent stabilization
- Commercial and residential land trusts
- Financial resources for organizing/the right to organize
- Zero- to low-interest loans
- Small-business grants/small-business support
- Workforce programs
- Naturally occurring affordable housing (NOAH) preservation
- Inclusionary zoning
- Universal basic income/guaranteed basic income
- Right to counsel
- Tenant screening reform
- Cultural placekeeping/placemaking

The report notes that these recommendations, while thoughtfully and rigorously considered, will need to be refined by governments, philanthropies, and other organizations to determine feasibility become actual policy. The ADWG provides next steps for implementation of its recommendations, one of which is to align anti-displacement research and recommendations with the Project’s mitigation measures.

The ADWG recommends the following actions:

- Creation of a regional group to continue the conversations about Project area-wide implementation of anti-displacement policies and strategies
- Creation of local government groups to receive the recommendations of the ADWG and to begin bringing recommended policies through official policymaking processes
- Creation of dedicated regional anti-displacement funding to support policy implementation, organizing efforts, and other anti-displacement strategies
- Alignment of anti-displacement research and recommendations with the Project’s mitigation measures
- Development of a Project area-wide supported anti-displacement policy agenda for the 2024 state legislative session



7.3.1.3 Artist-Led Engagement

To build on previous artist-led engagement conducted for the 2016 Alignment, this engagement strategy was reactivated to find an alternative alignment for the Project in July 2022. Cultivate Arts works with local artists to engage communities in the Project area to build artist capacity, demonstrate arts and placemaking tools, and activate the creative economy. Cultivate Arts led 31 culturally representative arts-based engagement events in communities along the Project area. The events, centered around music, dance, paint, photography, and interactive art installations, educated communities on the Project, while informing a Project area-wide plan for long-term public art. Through these efforts, Cultivate Arts engaged more than 5,000 residents from a diverse range of ages and cultural backgrounds.²⁴

7.3.1.4 EJ Comment Map

The Council launched an online EJ Comment Map to which community members can add spatial points within the study area where EJ individuals live, work, are served, or gather as well as any EJ concerns these communities and locations may have about the impacts of the Project. The purpose of the comment map was to gather input on EJ communities and issues in the study area beyond what can be identified using census and other data. The comment map was launched in September 2023 and was shared with members of the Community Cohort and members of the Blue Line Coalition (BLC) to contribute to and to share within their networks to collect additional input.

7.3.2 Summary of Public Outreach and Engagement with EJ Communities

The initial route and engagement principles were developed in early 2020, and the route modification engagement phase began in December 2020 using the strategies described above to reach EJ communities. Overall, between December 2020 and January 2024, the Blue Line Extension Engagement team conducted 284 engagement events aimed at EJ communities and reached 10,927 attendees. Maps of EJ-specific engagement events layered over EJ communities are provided in Figure 7-14 and Figure 7-15. These figures represent only in-person engagement events. Many outreach and engagement events designed to reach EJ communities occurred virtually because of COVID-19 pandemic restrictions on public gatherings in 2020 through 2022. These virtual events are not represented in the figures.

Table 7-5 and Table 7-6 summarize the engagement strategies employed to reach EJ and disadvantaged communities and the community organizations, respectively, and events the Blue Line Extension Engagement team partnered with to provide engagement services tailored to EJ and disadvantaged communities.



Figure 7-14 Engagement Events in BIPOC EJ Communities, December 2020 through January 2024

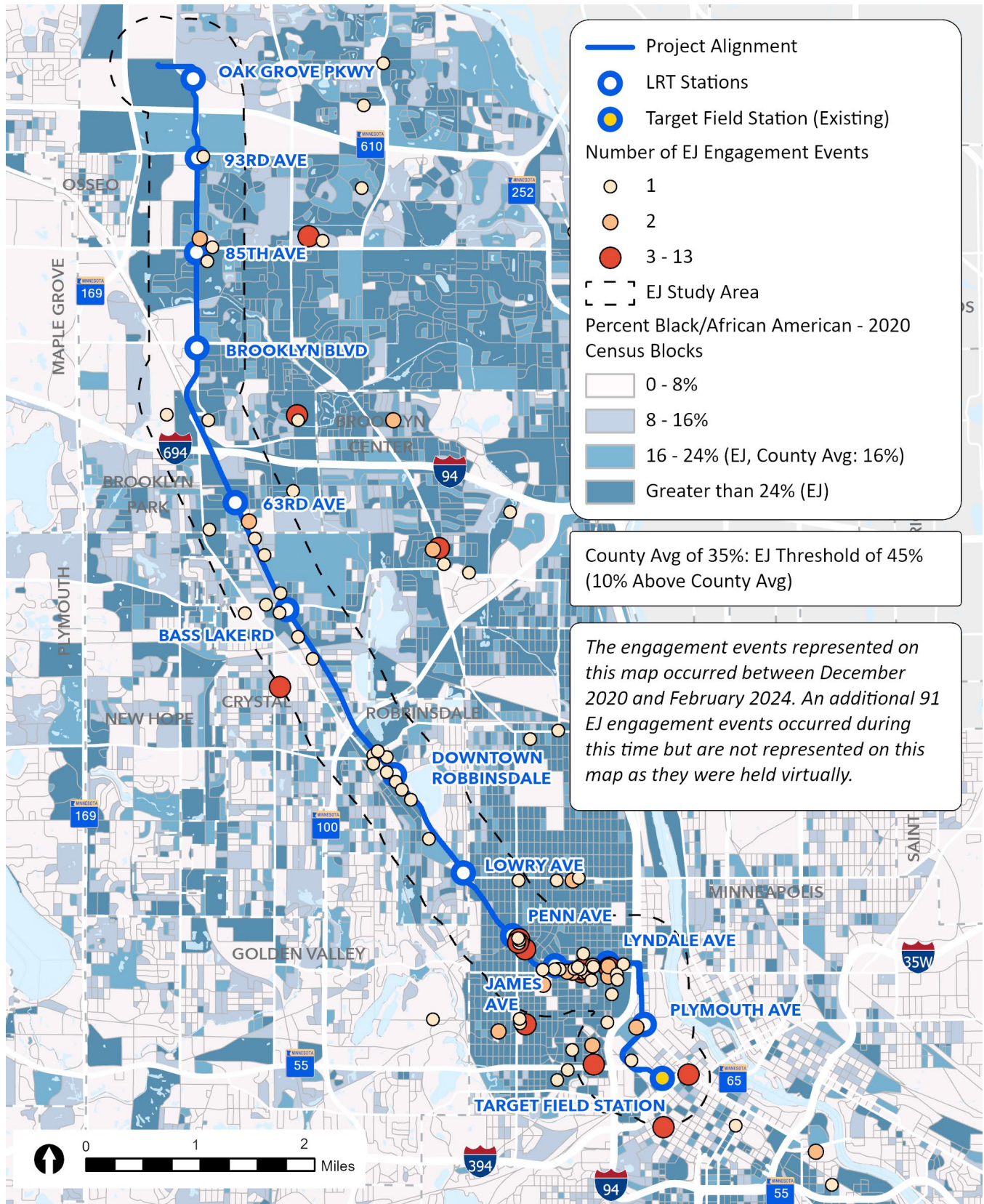




Figure 7-15 Engagement Events in Low-Income EJ Communities, December 2020 through January 2024

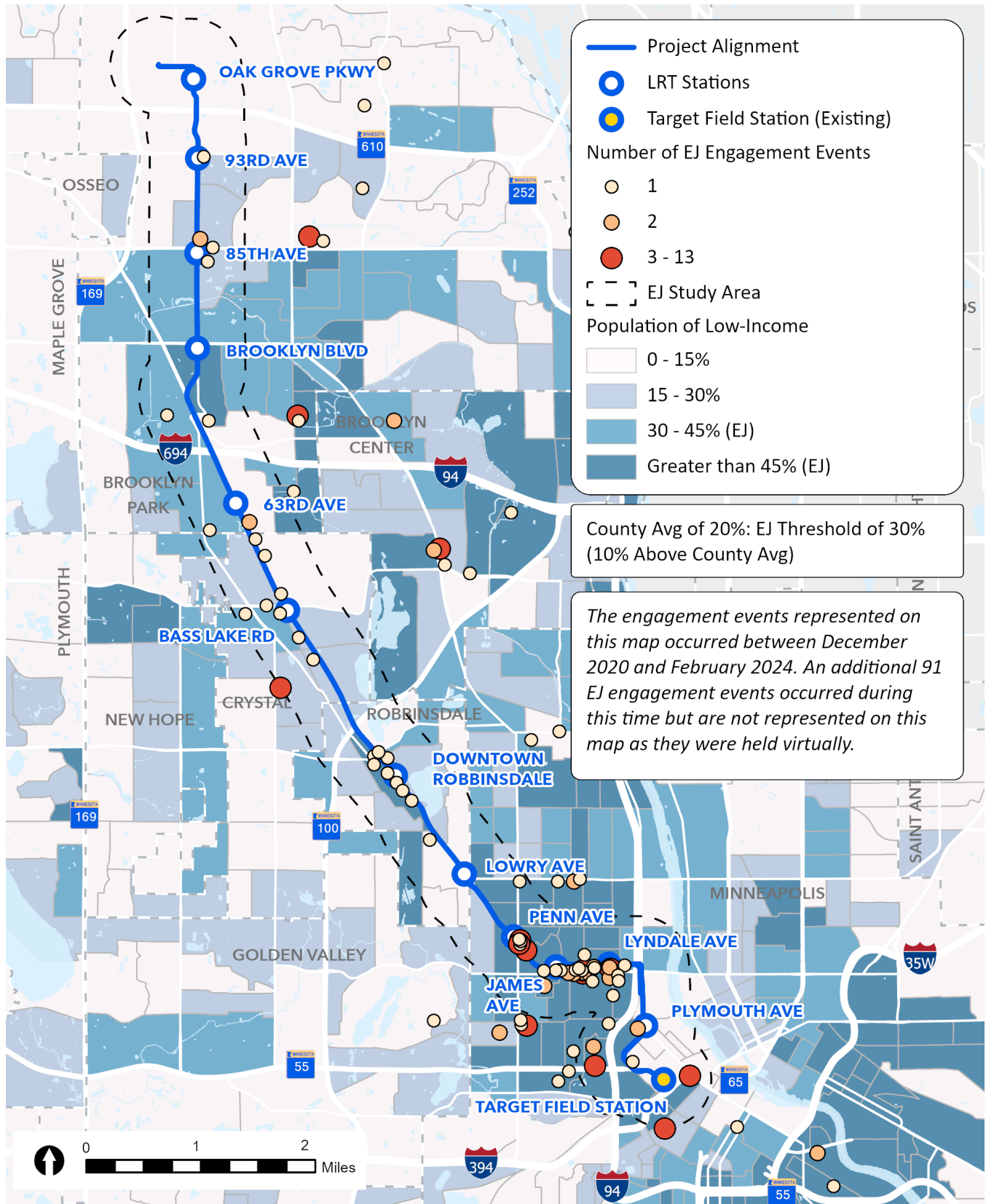




Table 7-5 Engagement Strategies Used to Reach EJ and Disadvantaged Communities

Community	Community Cohort	Cultivate Arts	Community Advisory Committee	Door Knocking	Surveys	Group Presentations	Pop Up Tabling Events	Tour of Proposed Alignment	One-on-One Conversation	Amplification of Project Information on Relevant Channels	Faith - Based Focused Outreach	Translation of Project Materials	Inventory of Businesses
Immigrant-owned small businesses, primarily Liberian	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓
Immigrant and refugee community	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Black/African immigrants	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Black business owners	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓
Latinx community	✓	✓	✓			✓	✓	✓	✓	✓	✓	✓	✓
Asian community	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓
Asian-owned small businesses	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓
Youth experiencing homelessness	✓	✓	✓		✓	✓	✓		✓				
Lao community	✓	✓			✓	✓	✓	✓	✓	✓		✓	✓
Community members of various racial and ethnic backgrounds	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓		✓	✓
Disability community ^a	✓		✓	✓	✓	✓	✓		✓				

^a Transportation Accessibility Advisory Committee.



Table 7-6 Community Organizations Supporting Engagement with EJ and Disadvantaged Communities

Organization	Immigrant-Owned Small Businesses, Primarily Liberian	Immigrant and Refugee Community	Black/African Immigrants	Black Business Owners	Latinx Community	Asian Community	Asian-Owned Small Businesses	Youth Experiencing Homelessness	Lao Community	Community Members of Various Racial and Ethnic Backgrounds	Disability Community
Harrison Neighborhood Association			✓								
Juxtaposition Arts			✓								
Center for Leadership & Neighborhood Engagement			✓								
Encouraging Leaders			✓					✓			
Hawthorne Neighborhood Council			✓								
Jordan Area Community Council			✓								
Northside Residents Redevelopment Council			✓								
West Broadway Business & Area Coalition			✓	✓							
Asian Media Access		✓	✓			✓	✓			✓	
Northside Economic Opportunity Network			✓	✓							
Heritage Park Neighborhood Association		✓	✓								



METRO Blue Line LRT Extension (BLE)

Organization	Immigrant-Owned Small Businesses, Primarily Liberian	Immigrant and Refugee Community	Black/African Immigrants	Black Business Owners	Latinx Community	Asian Community	Asian-Owned Small Businesses	Youth Experiencing Homelessness	Lao Community	Community Members of Various Racial and Ethnic Backgrounds	Disability Community
A Mother's Love			✓								
Liberian Business Association	✓	✓									
CAPI USA						✓					
Pueblos de Lucha y Esperanza		✓			✓						
Transportation Accessibility Advisory Committee											✓
Lao Assistance Center of Minnesota		✓				✓			✓		



As a result of these public engagement activities, the Council learned about issues that are perceived to be related to this Project. A summary of these issues is provided in Table 7-7.

Table 7-7 Summary of EJ Issues and Concerns Received through Public Engagement

Impacted EJ and Disadvantaged Communities in the Study Area	Summary of Concerns
W Broadway Ave Business District, City of Minneapolis	Impacts to parking, businesses, and institutions along W Broadway Ave would negatively impact an important area of commerce, culture, and wealth for the Black community
W Broadway Ave community, City of Minneapolis	Concerns related to loss of historical aspects along W Broadway Ave, especially in North Minneapolis.
W Broadway Ave community, City of Minneapolis	Concerns about the lack of a park-and-ride in their segment of the Project especially when the other Project cities would have them.
W Broadway Ave community, City of Minneapolis	Concerns about traffic operations with the reduction of W Broadway Ave to one lane in each direction. Specific concerns are related to drop-off and pickup of individuals with mobility needs at businesses along W Broadway Ave as well as bus operations.
Twin Cities International School, City of Minneapolis	Concerns about potential impact on children’s learning ability during construction and operation because of noise and vibration. Concerns with children and teacher safety because of an LRT station planned close to the school. Concerns about traffic operations during school bus drop-off and pickup times because of reduced roadway capacity and ability of school buses to route to school. Concerns regarding air particulate pollution on children’s health during the construction phase.
Lundstrom Performing Arts, City of Minneapolis	Concerns about noise and vibration impacting the recording studio and performing-arts center. Lundstrom Performing Arts serves more than 50% EJ clients. Concerns about increased traffic impacting ease of access for the clients to this business. Concerns about dividing the community further and separating Lundstrom Performing Arts from the rest of the community.
N 21st Ave residents, City of Minneapolis	Concerns about noise and property impacts to residential properties along N 21st Ave where the LRT tracks would be as well as concern that businesses are being prioritized over neighborhood residents.
Project area-wide	Support of the Project as it would improve transportation mobility for those reliant on public transportation.



Impacted EJ and Disadvantaged Communities in the Study Area	Summary of Concerns
Heritage Park Neighborhood, City of Minneapolis	Preference for the Project Alignment to go down Lyndale Ave as this route would better serve Heritage Park. Concerns that affluent homeowners in Lyn Park have been better able to influence the outcomes of the Project to be east of I-94.
KMOJ Building, City of Minneapolis	Concerns about property impacts to a building that houses an important radio station for the Black community in the Twin Cities metropolitan area.
City of Brooklyn Park	Concerns about pedestrian access across W Broadway Ave to locations such as North Hennepin Community College, shopping centers, etc.
City of Crystal	Concerns from the Liberian immigrant community about potential increases in property values around the Bass Lake Rd Station.
City of Robbinsdale	Concerns about community character and cohesion in the City of Robbinsdale downtown area.

As described in EO 14096 issued in 2023, harms stemming from the legacy of racial discrimination and segregation, redlining, exclusionary zoning, and other discriminatory land use decisions or patterns are critical to consider when assessing the impacts of this Project to EJ and disadvantaged communities. Through the public engagement activities described in this section, the Council learned about and documented past harms related to these legacy projects in EJ and disadvantaged communities. A summary of these past harms is provided in Table 7-8.

Table 7-8 Feedback on Past Harms from EJ and Disadvantaged Communities

Issue	Summary of Concerns
2016 Alignment through the Harrison and Heritage Park neighborhoods in the City of Minneapolis	The Harrison neighborhood is experiencing residual displacement impacts of development pressures related to the 2016 Alignment. Additionally, public-housing residents were relocated as part of a prior housing redevelopment project, and most have not returned. The Lao community along TH 55 has been particularly affected by this. There is community interest in right-to-return policies to avoid future displacement as well as down-payment assistance to convert BIPOC renters into homeowners, bans on privatization of public units, and adequate pre- eviction notices. Given the history of the Project and feedback received from the community regarding impacts to their neighborhood because of the 2016 Alignment, the Council, partner agencies, and ADWG will address these concerns as part of the anti-displacement initiatives that are ongoing for the Project.
HERC	Concerns about the air quality impacts that North Minneapolis communities have experienced in the past and continue to experience because of HERC's operations. The Hennepin County Board has voted to conduct a feasibility study on closing the HERC.
I-94	Harms suffered by the community because of I-94 construction.
TH 55	Harms suffered by the community because of TH 55 construction.
Expansion of CR 81	Harms suffered by the community because of immigrant-owned business relocations due to expansion of CR 81.



7.4 Analysis of Benefits and Adverse Effects

This section presents an analysis of Project benefits and adverse effects to EJ and Disadvantaged communities. The analysis is informed by the identification of EJ communities presented above and includes mapping and data sources as well as information and knowledge from EJ communities regarding benefits, impacts, and concerns. The Council performed a comparison of Project impacts and benefits to identify remaining adverse impacts that warrant additional steps to avoid, minimize, and mitigate adverse effects to EJ communities.

7.4.1 Project Benefits

Under USDOT Order 5610.2(a), the benefits of a proposed transportation project should be taken into account when determining whether disproportionately high and adverse effects to EJ communities would occur. While the Project is located in Hennepin County, it is an extension of an existing system and would provide regional benefits to the Project area as well as benefits to populations and businesses in the EJ study area. These benefits include improved mobility to employment centers and regional destinations; increased reliance on transit because of travel-time savings, a reliable trip, and improved access; reduction in local pollution and GHGs; safer streets; and short- and long-term job creation. These benefits would not occur with the No-Build Alternative. While all populations within the Project area would realize these benefits, studies have shown that they can accrue to a higher degree for EJ communities. Justice40 benefits are also highlighted below.

7.4.1.1 Improved Mobility to Employment and Regional Destinations

The Project would greatly improve mobility and access in the highly traveled northwest area of the Twin Cities Metropolitan Area, including communities with high numbers of households that rely on transit to get where they need to go every day. The Project would provide a one-seat ride to the Minneapolis-St. Paul International Airport; the Mall of America; and serve the communities of Golden Valley, New Hope, Brooklyn Center, Maple Grove, Osseo, Champlin, and Dayton while passing through and directly serving the Cities of Minneapolis, Robbinsdale, Crystal, and Brooklyn Park.

Several activity centers and community-identified important places are located along the Project Alignment, including the Downtown Minneapolis, the West Broadway Avenue Business District in North Minneapolis, Victory Memorial Park, Downtown Robbinsdale, the Crystal Shopping Center, the City of Brooklyn Park commercial strip, and North Hennepin Community College. In addition, large business-park and mixed-use development areas with potential for substantial employment concentrations are anticipated by 2040 in the City of Brooklyn Park (surrounding the Target North Campus and along US 169 north of TH 610) and the City of Robbinsdale downtown area along W Broadway Ave near 42nd Ave N.

While integrating with other existing and planned transitways, the Project and its 12 LRT stations would connect people and affordable housing to jobs, education, healthcare, culture, and recreation. By coordinating this generational transit investment with strong strategies to build community prosperity and minimize displacement, the Project can help reduce regional disparities and bring transformative benefits to current residents and future generations in the Project area.

Access to transit would improve for all populations within the Project area and in particular for those populations residing within one-half mile of the LRT stations (a walkable distance) of the Project. With improvements in travel reliability, users of the system extension would be able to travel longer distances with fewer transfers, which would result in travel-time savings to employment centers and could allow for new employment opportunities. This benefit is particularly important for those most reliant on transit.



7.4.1.2 Improved Service for Transit-Reliant Communities

The Project would serve and connect communities in the study area as well as the Twin Cities metropolitan area that are likely to use or rely on public transit to meet their transportation needs. Because the LRT would operate in an exclusive right-of-way, it would provide improved on-time performance for riders compared to bus service, which can be affected by increasing traffic congestion. The Project would also improve reliability and frequency to and from regional centers.

As discussed in section 7.2.3, there are higher concentrations of people with disabilities and zero-car households in the study area as compared to Hennepin County, along with concentrated areas of residents older than 65. These populations, along with high concentrations of low-income and BIPOC populations, indicate communities in the study area are transit-reliant and would benefit from the Project.

According to U.S. Census estimates,²⁵ more than 500,000 people live in the municipalities that the Project would directly serve, and an additional 177,000 people live in adjacent municipalities served by local transit connections and park-and-ride locations. As indicated in Chapter 1, the Cities of Osseo and New Hope house a considerably higher percentage of people who are disabled compared to the region at large. The Cities of New Hope, Osseo, and Golden Valley house a considerably higher percentage of people more than 65 years old than the metropolitan area at large. The communities in the Project area also have a higher rate of zero-car households and a much higher rate of renting residents than Hennepin County or the entire Twin Cities metropolitan area. More than half of the renting households in the Project area are housing cost-burdened. More than 30 percent of the households in the Project area meet the census definition of poverty, compared to 19 percent of all households in the metropolitan area.²⁶ Half of the residents in the Project area identified themselves in the 2020 census as BIPOC. Comparatively, the Twin Cities metropolitan area has an average of 27 percent BIPOC residents. In addition to serving transit-reliant communities within the study area, the Project would benefit those communities throughout the Project area and the Twin Cities metropolitan area.

7.4.1.3 Reduction in Local Pollution and Greenhouse Gases

Communities in the Project area endure health burdens related to legacy projects such as highway expansion and historical locating of polluting industries in or near low-income and BIPOC neighborhoods. The Project has the potential to reduce reliance on SOVs by providing an alternative, reliable transit option. The resulting reduction in VMT would reduce emissions in the Project area and would benefit health-burdened populations.

As indicated in Chapter 5, the Project would reduce VMT by 89,600 miles daily in 2040, with an associated reduction in GHG emissions of 114,600 MT. Air toxins, diesel particulate emissions (PM_{2.5}), and other automobile-related pollutants would be reduced, and an annual energy savings of 119 billion Btu would be realized as compared to the No-Build Alternative. These benefits would accrue throughout the region and are particularly important for those disadvantaged communities suffering from high legacy pollution, energy, and health burdens identified in the Justice40 tool, as well as children.

Minneapolis 2040 contains Policy 16, which aims to address the environmental impacts of transportation through reducing “the energy, carbon, and health impacts of transportation through reduced single-occupancy vehicle trips and phasing out of fossil fuel vehicles.” Increasing the availability and attractiveness of public transit is one action step that the City of Minneapolis intends to take to address Policy 16. Additionally, the TAP, which supports the critical transportation component of *Minneapolis 2040*, explains that every effort of the TAP “will support reducing vehicle miles traveled in single occupancy and high carbon vehicles.”²⁷ This will also help the City of Minneapolis achieve its goal of an 80 percent emissions reduction by 2050.²⁸



Plans put in place by Hennepin County also contribute to balancing modal needs and VMT reduction at the local level. Hennepin County identifies the challenge of accommodating projected population growth, the pressure this will place on existing transportation systems, and the need to provide access to alternative modes in its *2040 Comprehensive Plan*.²⁹ Hennepin County also notes that transportation preferences are shifting, and county residents expect “new and diverse mobility options that are affordable and available throughout the county.” Hennepin County also identifies the importance of VMT reduction in its *2040 Comprehensive Plan*. The County aims to reduce VMT from 2.14 billion to 2.06 billion by 2040 by encouraging alternative modes of transportation and shorter commutes.³⁰ The Project would play a critical role in supporting stated goals identified at the local, regional, and state levels to balance transportation modes and reduce VMT.

7.4.1.4 Improved Traffic and Roadway Safety

Traffic safety is a major concern in Hennepin County, which has the highest number of crashes resulting in injury or fatality of any county in the State.³¹ In the City of Minneapolis, 9 percent of the streets accounted for 66 percent of the fatal and severe-injury crashes that occurred between 2017 and 2021. Within the study area in the City of Minneapolis, eight intersections are designated high-injury intersections, and the following are designated high-injury streets: N Lowry Ave, W Broadway Ave, N Lyndale Ave, N Washington Ave, N 7th St, TH 55, N 2nd Ave, and N 1st Ave. Additionally, N Penn Ave, N Fremont Ave, N Emerson Ave, and Hennepin Ave were identified as corridors to monitor.³² The City of Minneapolis reports that Native American and Black residents are disproportionately affected by traffic accidents. Native Americans compose 1 percent of the City of Minneapolis population yet represent 5 percent of those killed in pedestrian and bicycle traffic crashes and 4 percent of people killed in vehicle crashes. Black residents compose 19 percent of the City of Minneapolis population and 26 percent of people killed in vehicle crashes.³³

Public transportation is one of the safest mobility options. There were 134 times more fatalities on highways than on transit in the United States in 2020.³⁴ Public transportation investment and supportive policies increase traffic safety in several ways, including reduced crash risk to travelers who shift from automobile to transit, community-wide crash reductions because of less total auto VMT, and safer traffic speeds. The American Public Transportation Association (APTA) reports, in *The Hidden Traffic Safety Solution*,³⁵ that transit-oriented communities are five times safer because they have about one-fifth the per capita traffic casualty rate (fatalities and injuries) as automobile-oriented communities. Public transit investment cuts a community’s crash risk in half even for those who do not use transit, including children. Transit spurs compact development, which reduces auto VMT and tends to calm traffic.

7.4.1.5 Workforce Development and Job Creation

EJ and disadvantaged communities would benefit from job creation because of the Project. New jobs would be created to operate the system extension and to construct the Project and growth in supply-chain industries and consumer spending would be expected in the region. The benefits that disadvantaged communities receive from job creation related to this Project is a key theme the Council heard during outreach engagement. The community would like to see programs and policies ensuring that EJ communities that live in or near the Project area benefit from the job opportunities resulting from this Project. The Council and Hennepin County will continue to explore Project-specific commitments, which will be included in the Supplemental Final EIS.

7.4.1.6 Justice40

Though redlining and racially restrictive covenants are no longer actively used practices in housing, their legacy continues to influence where BIPOC and white people live in the Twin Cities metropolitan area. The Project has the potential to bring more mobility and economic resilience to communities in North Minneapolis and other neighborhoods that were explicitly barred from mobility and wealth throughout the 20th century. As indicated above, 44 percent of the census tracts that intersect with the EJ study area are designated disadvantaged



communities by the Justice40 CEJST. Seven of the 12 LRT stations would serve populations residing in these disadvantaged communities.

The Project would connect historically disinvested communities with the City of Minneapolis downtown area and adjacent suburbs that are currently experiencing expansions in housing and employment opportunities. The 2040 TPP acknowledges that ensuring that the potentially beneficial effects of a new transit system are equitably experienced takes planning: “[i]mportant prioritizing criteria for transitways include providing access to regional jobs and activity centers..., including historically underrepresented communities and promoting equity through increased access to opportunity.”³⁶ The Just Deeds Project helps property owners remove “shameful and discriminatory language from property titles” by providing free legal and title services. All Project cities are participating in the Just Deeds Project, which can be accessed online at www.justdeeds.org.

7.4.2 Potential Adverse Effects and Mitigation

The environmental topics considered for adverse effects to EJ communities in this Supplemental Draft EIS are listed in Table 7-9. Topics that have potential adverse effects are further described below. Where adverse impacts warrant mitigation after further analysis to avoid or minimize negative impacts, mitigation options will be developed through collaboration with affected communities and identified in the Supplemental Final EIS.

Table 7-9 Review of Potential Adverse Effects by Topic

Environmental Category	Potential Adverse Effects	Discussion
Transit conditions	No	Introduction of LRT service is a benefit to EJ communities; see Section 3.1
Pedestrians and bicyclists	No	See Sections 3.2 and 3.3
Vehicular traffic	No	See Section 3.3
Parking	Yes	Potential adverse effects with removal of on-street parking throughout North Minneapolis; see discussion below in Section 7.4.2.1
Freight rail conditions	No	See Section 3.6
Aviation	No	See Section 3.7
Land use plan compatibility	No	See Section 4.1
Community facilities/community character and cohesion	Yes	Potential adverse effects at Bass Lake Rd Station area in the City of Crystal and N 21st Ave in North Minneapolis; see discussion below in Section 7.4.2.2
Parks and recreation	No	See Chapter 8
Displacement of residents and businesses	Yes	Full acquisition of 37 properties, 100% in EJ communities; see discussion below in Section 7.4.2.3
Cultural resources	No	See Section 4.4
Visual/aesthetics	No	See Section 4.5
Economic effects	No	See Section 4.6
Safety and security	No	See Section 4.7. Specifically related to EO 13045, the project would not result in adverse safety and security impacts and thus no disproportionate impact on children.
Utilities	No	See Section 5.1
Floodplains	No	See Section 5.2
Wetlands	No	See Section 5.3
Geology, soils, and topography	No	See Section 5.4



Environmental Category	Potential Adverse Effects	Discussion
Hazardous-materials contamination	No	See Section 5.5. Specifically related to EO 13045, the project would not result in adverse hazardous materials impacts and thus no disproportionate impact on children.
Noise	Yes	Moderate and severe adverse noise impacts to EJ communities, which could also disproportionately affect children if not mitigated; see discussion below in 7.4.2.4
Vibration	Yes	Adverse vibration impacts to EJ communities, which could also disproportionately affect children; see discussion below in 7.4.2.5
Biological environment	No	See Section 5.8
Water quality and stormwater	No	See Section 5.9
Air quality/GHG emissions	No	See Section 5.10 Specifically related to EO 13045, the project is anticipated to provide air quality and GHG emission improvements in the long term, thus benefitting children in the study area. Construction-phase air quality impacts that would disproportionately affect children are possible but would be mitigated.
Energy	No	See Section 5.11
Indirect and cumulative	Yes	Potential adverse effects of indirect displacement of residents in the City of Minneapolis; see discussion below in Section 0
Construction-related	Yes	Potential adverse effects during construction; see discussion below in Section 7.4.2.7

7.4.2.1 Parking

As discussed in Chapter 3, a total of 746 on-street parking spaces would be eliminated with the Project in North Minneapolis between N Vincent St and N 5th St. From engagement with the community, these on-street parking spaces are critical to supporting small EJ-owned and -operated businesses along W Broadway Ave and tenant parking along the residential street of N 21st Ave. Eliminating these parking spaces could make it more difficult for customers to access their businesses by car, with the potential to lose business. The City of Minneapolis has a Complete Streets policy supporting the prioritization of street space for people walking, bicycling, and using transit above vehicles.

While the City of Minneapolis policy is supportive of parking removal, this parking loss would be predominantly borne by EJ communities in North Minneapolis. Approximately 580 of the 746, or 77 percent, of the parking spaces that would be removed are physically located immediately in or adjacent to EJ communities, and this analysis conservatively assumes that all 746 are used by EJ populations given their proximity to EJ communities. The provision of replacement parking to fully mitigate this impact would be infeasible. However, the Council along with Hennepin County and the City of Minneapolis, are committed to identifying measures to lessen these disproportionate effects. The Council will conduct parking utilization studies and seek to preserve on-street parking through design adjustments, to the extent practical. Through coordination with affected communities, the Council will identify and prioritize critical parking needs and address mitigation on a case by case basis. This effort will prioritize preserving accessible parking at key locations on W Broadway and will identify betterments or enhancements based on the needs of the community. The result of these discussions and mitigation commitments will be presented in the Supplemental Final EIS.



The acquisition of private parking lots would be mitigated through the Uniform Act, which provides for the equitable treatment of persons displaced from their homes and businesses by federal and federally assisted programs. It establishes uniform and equitable land acquisition procedures including compensation at fair market value and relocation assistance at suitable sites in proximity to the existing property. Therefore, the loss of off-street parking is not considered an adverse effect.

7.4.2.2 Community Facilities/Character and Cohesion

This section discusses the adverse effects as well as benefits the Project will have on community facilities, character, and cohesion. As a result of the Project being constructed primarily within the existing right-of-way already designated for transportation, the Project is not expected to divide neighborhoods or communities. Elements of the Project would be added to the Built environment, such as LRT stations, pedestrian walkways, and operational facilities and equipment. These elements would be designed to integrate with the surrounding area to preserve neighborhood character and maintain or improve access to community facilities.

The conversion of N 21st Ave in the City of Minneapolis between the James Ave Station and I-94 to a transit mall would constitute a substantial change in community character for those who live and work along this 10-block section, which is located entirely in an EJ community. This substantial change to N 21st Ave, along with the acquisition of six buildings, resulting in the relocations of seven community amenities, including the Five Points Building, which houses the KMOJ radio station, Morning Star Assembly of God, J&J Furniture store, and Olympic Café, would mean impacts to community character and facilities would be disproportionately borne by EJ communities in the City of Minneapolis.

Feedback from adjacent communities received during the targeted EJ outreach related to community character is discussed below. Mitigation measures for community amenity and cohesion will include collaborating with community members on culturally specific designs.

City of Brooklyn Park

EJ communities in the City of Brooklyn Park have expressed concerns about pedestrian safety and comfort under current conditions when crossing W Broadway Ave and CR 81 at certain locations. Specific issues exist at the 85th Ave N and W Broadway Ave intersection where pedestrians cross from North Hennepin Community College to the commercial amenities on the southeast corner of the intersection, the 76th Ave N and W Broadway Ave intersection where residents from Parkhaven Apartments (east of W Broadway Ave on 76th Ave N) cross on foot to access amenities (Target, Cub, etc.) at the Starlite Center on the west side of W Broadway Ave and at 63rd Ave N where the LRT station is planned to be in the middle of the roadway.

Pedestrian improvements are planned throughout the City of Brooklyn Park with the Project including reconstruction of 33 existing intersections with ADA-compliant pedestrian facilities, nine new ADA-compliant intersections would be added, mostly in the Oak Grove Pkwy Station area, and three new pedestrian roadway crossings would be installed where no crossing currently exists.

At the 85th Ave N and W Broadway Ave intersection vehicle slip lanes would be eliminated and crossing lengths would be reduced. A mid-block crossing would be added between 85th Ave N and Rhode Island Dr, sidewalks would be added along W Broadway Ave and widened along 85th Ave N, and a sidewalk connection to North Hennepin Community College would be added. While these added amenities would improve the experience for pedestrians at this intersection, conditions would still be categorized as “uncomfortable” for people walking at this location.



A new midblock crossing would be added between 76th Ave N and Brooklyn Blvd that would serve Parkhaven Apartment residents accessing the Starlite Center (Target, Cub, etc.) and would improve the crossing experience for people crossing W Broadway Ave on foot at this location.

At 63rd Ave N where the LRT station platform would be located in the middle of the roadway, traffic lanes would be narrowed, and pedestrian and bicycle signage would be added in advance of free right turns to alert drivers. Curb radii would be reduced, which would require drivers to slow down when making turns. These added features would improve the pedestrian experience at this intersection.

An OMF would be constructed near the northern terminus of the system in the City of Brooklyn Park at 101st Ave N and Xylon Ave N, in an area of BIPOC population. The Rush Creek Regional Trail passes through this area just to the north of the proposed OMF location. This area is currently undeveloped, and TH 610 provides a buffer between the site and the residential neighborhoods to the south. Changes to community character in the City of Brooklyn Park would be associated primarily with the reconstruction of this area to accommodate the needs of the OMF site, which would be designed in accordance with future land use plans.

Creation of the OMF would result in changes to visual character and quality from the Rush Creek Regional Trail in this EJ area. To the extent feasible, Project facilities would be sited to avoid locations in proximity to residences, parks, and other sensitive visual receptors. Where avoidance is not feasible, or where greater visual or privacy effects are anticipated to result from the introduction of new physical features of the Project, potential efforts could include screening or softening the view using landscaping or walls where adequate space permits. Potential landscape treatments could be selected for consistency with applicable local policies, consideration for agency maintenance budgets and staffing, and compatibility with the character of the parks and surrounding neighborhoods. Mitigation for visual impacts in this location would be developed during the next phases of design development through architectural design and landscaping in collaboration with the impacted communities.

City of Crystal

In the City of Crystal, the new Bass Lake Rd Station and the associated new CR 81 grade-separated interchange would introduce new visual elements and result in moderate noise impacts. This area contains EJ communities. The Project would result in 14 moderate noise impacts to residential properties in the City of Crystal near the Bass Lake Rd Station and four moderate impacts to single-family residences at 47th Ave N and the CPKC railway. These impacts would occur on five properties, one of which is a 14-unit multifamily residence. Noise impacts result primarily from proximity of the tracks, speed of the train, and bells at the Bass Lake Rd Station. Moderate visual quality impacts would also occur at the Bass Lake Rd Station given the addition of grade-separated bridges over Bass Lake Rd and associated ramps.

To mitigate the visual impacts, the Project would incorporate design features at stations, at aerial structures, and throughout the Project in a manner that would be compatible with the surrounding area and developed in collaboration with the impacted community. Additionally, various urban street design elements could be implemented to increase greenery throughout the Project. Elements such as curb extensions can help to add greenery treatment, slow traffic, and visually and physically narrow the roadway. The Council will solicit input from the public throughout final design to refine station designs, architectural characteristics of elevated structures, landscape plans, cultural placemaking including incorporation of the role of art, culture and heritage, and other design commitments. Specifics will be developed in collaboration with affected communities and will be presented in the Supplemental Final EIS. A summary of potential noise impacts and mitigation is provided below.



City of Minneapolis

The Project would result in adverse impacts to community character along N 21st Ave, benefits to community cohesion, and moderate adverse impacts to community facilities in EJ communities in the City of Minneapolis.

The conversion of N 21st Ave between the James Ave Station and I-94 to a transit mall would constitute a substantial change in community character for those who live and work along this 10-block section, which spans the southern border of the neighborhoods of Jordan and Hawthorne. Given its urban setting, this section of N 21st Ave is relatively quiet and lightly traveled and tree lined. The north side of N 21st Ave is residential between Fremont Ave N and N 4th St and the south side includes residential and back of commercial properties. The residential properties on the north side are mostly single-family homes that front the alleyways perpendicular to N 21st Ave, dividing the city blocks in half. Businesses that line West Broadway occupy the south side of N 21st Ave forming a sharply delineated boundary between the commercial and residential districts. Public access to these businesses faces W Broadway Ave or the intersecting side streets. While a transit mall would provide a pedestrian and bicycle friendly environment by prohibiting general vehicular traffic on the street, and enhanced access to the LRT stations, noise levels at residential properties would increase due to the proximity of the rail line and the train bells that would sound when entering the James Ave and Lyndale Ave Stations (see Section 7.4.2.4). Most of the residential properties have driveways and garages that front onto the alleyways and would access their homes via N 22nd Ave and an alleyway. However, there are residential properties with driveway access from N 21st Ave. Alternate means of access for these properties will be explored as the project design advances. See Appendix A-E for conceptual engineering plans illustrating properties with access changes from N 21st Ave. These Project impacts are considered adverse effects to EJ communities and the Council would identify measures to mitigate the adverse impacts in consultation with the affected community. Potential mitigation options include cultural placemaking/placekeeping through design input; additional connectivity investments; or other enhancements that would offset the impacts to community character. Mitigation measures are under development through coordination with the community and will be presented in the Supplemental Final EIS.

The Project would improve overall community cohesion in the City of Minneapolis. New mid-block pedestrian and bicycle crossings of W Broadway Ave would improve east–west community connectivity near the Lowry Ave and Penn Ave Stations. A new multimodal bridge, which includes accommodations for people walking and bicycling, across I-94 would improve connectivity across the highway that has long been a barrier between North Minneapolis and the rest of the city. Light-rail service from Target Field Station through North Minneapolis would create new community connections throughout North Minneapolis. Vehicular traffic eliminated along N 21st Ave between Irving Ave N and 4th St N would result in traffic moving to W Broadway Ave and access changes along N 21st Ave. Overall, community cohesion would have a net benefit of improving access to people walking and bicycling east/west in parallel with W Broadway Ave.

As described in Section 7.4.2.1, a total of 746 on-street parking spaces would be eliminated with the Project in North Minneapolis between N Vincent St and N 5th St, which would impact access to community amenities for those traveling by vehicle. Off-street parking losses would occur at the Minneapolis Public Schools administration building on W Broadway Ave. Twelve of the community amenities identified in Figure 4-4 in Chapter 4 would require minor permanent acquisitions, including the Salvation Army, Harold Mezile North Community YMCA, and a small urban farm at N 21st Ave and Dupont Ave. These acquisitions would not affect the use, access, or enjoyment of these properties. The Project would also require the acquisition of six buildings, resulting in the relocations of seven community amenities, including the Five Points Building, which houses the KMOJ radio station, Morning Star Assembly of God, J&J Furniture store, and Olympic Café. All acquisitions and relocations would be mitigated through compensation and relocation assistance in accordance with the Uniform Act. Improved transit and bicycle and



pedestrian access is an offsetting benefit to the vehicle parking and acquisition impacts, though additional mitigation is warranted. Additional Project commitments specific to environmental justice communities will be identified in the Supplemental Final EIS after targeted outreach to those most affected. For example, mitigation could include streetscaping improvements, wayfinding, and communication support to help people reach their destinations. This adverse effect would be predominantly borne by the EJ community as summarized above.

7.4.2.3 Displacement of Residents and Businesses

The Project would require land acquisitions and direct displacements along the Project Alignment, including commercial and residential properties. Both non-EJ and EJ communities (including businesses) would experience acquisitions but given the high concentration of EJ communities along the length of the Project Alignment, direct impacts would be predominantly borne by EJ communities, as shown in Table 7-10. All residential relocations and the majority of non-residential relocations for the Project are in EJ areas, with the vast majority in the disadvantaged community of North Minneapolis (Table 7-11).

Efforts to minimize or avoid property acquisitions will continue through final design. Property acquisition activities would occur in accordance with the Uniform Act, as amended, and other laws that establish the process through which the Council may acquire real property through a negotiated purchase or through condemnation.³⁷ Additional measures to support low-income property owners and renters through relocation will be explored as well.

Table 7-10 EJ and Non-EJ Project Property Impacts

Property Location – Within EJ Communities vs All	Parcel Impacts (Acres)	Partial Parcel Impacts (count)	Full Parcel Acquisitions (count)	Relocations (count)	Residential Relocations (count)	Non-Residential Relocations (count)
Property Impacts in EJ Communities	9.7	276	30	31	14	17
All Property Impacts	81.7	303	37	36	14	22
% of Impacts in EJ Communities	11.9%	91.1%	81.1%	83%	100%	77.3%



Table 7-11 Parcel Acquisitions and Relocations by City

City	Parcel Type	Parcel Impacts (acres)	Partial Parcel Impacts (count)	Full Parcel Acquisitions (count)	Relocations (count)	Residential Relocations (count)	Non-residential Relocations (count)
Brooklyn Park	EJ	6.5	143	5	2	0	2
Brooklyn Park	All	67.4	153	5	2	0	2
Crystal	EJ	0.5	4	1	1	0	1
Crystal	All	4.2	10	5	6	0	6
Robbinsdale	EJ	0.7	19	0	1	0	1
Robbinsdale	All	3.1	24	1	1	0	1
Minneapolis	EJ	2	110	24	27	14	13
Minneapolis	All	7.0	116	26	27	14	13

7.4.2.4 Noise

As summarized in Table 7-12, all but two noise impacts associated with the Project are located in EJ communities; therefore, the adverse noise impacts of the Project would be predominantly borne by EJ communities.³⁸ The Project includes long-term noise impacts due to the introduction of LRT into the Project area. The majority of the impacts are due to the proximity of the tracks (wheel/rail interaction) to the sensitive land use, grade crossing bells, and the location of the crossovers.³⁹

Using noise impact criteria for outdoor noise established by FTA, the Council identified moderate noise impacts at four residential properties in the City of Brooklyn Park, five residential properties in the City of Crystal, and two residential properties in the City of Robbinsdale. In total for these cities, up to 28 dwelling units at the affected properties would be affected by noise levels produced by the Project. In the City of Minneapolis, the Council identified moderate noise impacts at 16 residential properties and severe noise impacts at 15 properties. In total in the City of Minneapolis, up to 211 dwelling units would be affected by noise levels that fall in the moderate range and 173 dwelling units would be affected by noise levels that fall in the severe range. The highest increases in noise levels would occur along N 21st Ave, which accounts for eight of the 16 properties with moderate impacts and 10 of the 15 residential properties with severe impacts. Due to the low existing noise levels along N 21st Ave (measured at 55 decibels), the introduction of the Project would be highly noticeable in certain locations, with noise level increases of between 3 to 19 decibels depending on the location.

These noise impacts are considered adverse effects to EJ communities and mitigation measures include a range of options based upon Metro Transit’s Noise Mitigation Approach following FTA guidelines, which is outlined in Chapter 5, Section 5.6. Through final design, the Council would further study the noise effects of the Project and identify specific mitigation measures to reduce or eliminate noise impacts. The Council would consider the following mitigation measures: vehicle noise specifications, vehicle skirts, wheel treatments, under-vehicle absorption materials, restriction of train bell use, sound insulation of impacted properties, vehicle specifications, and special track support systems.



Table 7-12 Summary of Noise Impacts by Municipality

City	Building Type	# of Properties Affected (# of Dwelling Units) – Moderate Impact	# of Properties Affected (# of Dwelling Units) – Severe Impact	Cause of Impact	Impact Located in EJ or Non-EJ Community
Brooklyn Park	Single-family	1	0	Expansion of CR 103, train bells, and wheel/rail interaction.	EJ
Brooklyn Park	Multifamily	3 (12 Dwelling Units)*	0	Expansion of CR 103, train bells, and wheel/rail interaction.	EJ
Brooklyn Park	Institutional	1	0	Expansion of CR 103, train bells, and wheel/rail interaction.	EJ
Crystal	Single-family	4	0	Wheel/rail interaction and speed of train.	EJ
Crystal	Multifamily	1 (14 Dwelling Units)*	0	Wheel/rail interaction and speed of train.	EJ
Crystal	Institutional	0	0	Wheel/rail interaction and speed of train.	N/A
Robbinsdale	Single-family	2	0	Wheel/rail interaction and speed of train.	Non-EJ
Robbinsdale	Multifamily	0	0	Wheel/rail interaction and speed of train.	N/A
Robbinsdale	Institutional	0	0	Wheel/rail interaction and speed of train.	N/A
Minneapolis	Single-family	11	10	Wheel/rail interaction, train bells.	EJ



City	Building Type	# of Properties Affected (# of Dwelling Units) – Moderate Impact	# of Properties Affected (# of Dwelling Units) – Severe Impact	Cause of Impact	Impact Located in EJ or Non-EJ Community
Minneapolis	Multifamily	5 (200 Dwelling Units)*	5 (163 Dwelling Units)*	Wheel/rail interaction, train bells.	EJ
Minneapolis	Institutional	1	0	Wheel/rail interaction, train bells.	EJ

Source: *Noise and Vibration Technical Report*. Cross-Spectrum Acoustics, Inc. 2023.

*Includes total number of dwelling units at the affected properties. Additional noise measurements and analysis will be performed to determine potential impacts at each dwelling unit and the reasonable and feasible mitigation measures that would be implemented.



7.4.2.5 Vibration

Introduction of LRT into the Project area would result in a total of 28 long-term vibration impacts. These vibration impacts would all be in the City of Minneapolis and affect EJ communities and thus vibration impacts would be predominantly borne by EJ communities. Vibration and ground-borne noise impacts that exceed the FTA criteria are considered significant and should be mitigated unless there are no feasible or practical means to do so. Vibration mitigation is applied primarily at the source, generally the track structure, and is dependent on the frequency content of the vibration and any resonances of the materials.

Through final design, the Council will further study the vibration effects of the Project and identify specific mitigation measures to reduce or eliminate vibration impacts. Long-term vibration mitigation is applied at the source, generally the track structure, and depends on the frequency content of the vibration and any resonances of the materials. Vibration mitigation material can include ballast mats, resilient rail fasteners, and other materials.

7.4.2.6 Indirect and Cumulative Effects

Indirect and cumulative effects for the Project center around potential indirect displacement of residents within the Project area. Through public engagement, community members have voiced concerns about the threat of indirect displacement because of new development pressure with a new transit investment. Hennepin County contracted with CURA to conduct research and engagement with the ADWG. See Section 7.3.1.2 for a discussion on this process and recommendations. As noted earlier in this chapter, the report developed by CURA notes that the recommendations, while thoughtfully and rigorously considered, will need to be refined by governments, philanthropies, and other organizations to become actual policy. The ADWG provides next steps for implementation of its recommendations, one of which is to align anti-displacement research and recommendations with the Project's mitigation measures.

The adverse effect of indirect displacement of residents and businesses, which would be borne predominantly by EJ communities, warrants specific mitigation commitments. Refining the ADWG recommendations into mitigation commitments by the Project sponsor is ongoing and will be identified in the Supplemental Final EIS. In addition, exploration of measures and policies to prevent and address displacement will continue within as well as outside of the Project. Measures under consideration as part of the Project include workforce development partnerships and contractor requirements, with the resulting goal of addressing economic disparities by building generational wealth; cultural placemaking/placekeeping to prevent cultural displacement; and a community resource center to provide business marketing support and communication during construction and connect people to available resources.

7.4.2.7 Construction-Related Impacts

Construction-related impacts would affect EJ and non-EJ communities along the Project Alignment. Direct impacts because of Project construction activities could include the following:

- Temporary transportation impacts such as traffic pattern changes and rerouting
- Temporary air quality impacts because of the movement and operation of construction vehicles
- Temporary increases in noise and vibration because of the movement and operation of construction equipment
- Temporary property easements
- Potential impacts to visual quality
- Construction-related temporary business impacts that could temporarily impact profitability

Construction impacts would be temporary and minimized using best construction practices (see Chapters 3, 4, and 5 for traffic, noise, and air quality mitigation commitments, respectively). Prior to construction, a Traffic Management Plan would be developed to address construction-phase impacts on travel; keep traffic, bicycles, and pedestrians



moving safely during construction; provide access to public and private property along the Project Alignment; and provide appropriate wayfinding and other signs for motorists, cyclists, and pedestrians. Road closures would also be limited to nighttime and off-peak periods as much as possible.

Prior to the start of construction, the Council would develop a comprehensive Construction Management Plan that corresponds to construction phasing. The plan would be developed and implemented to identify and address the potential for Project impacts to neighborhood character and cohesion, and to community resources during Project construction activities. Additionally, and related to EO 13045, community members have expressed concern about the impact of construction activities on air quality near the Twin Cities International School. Additional measures to assist businesses owned by or serving EJ communities will be explored in partnership with the community. The Construction Management Plan would include the following information:

- Planned timing of construction activities by construction phase or by neighborhood
- Description of measures for temporary park closures, temporary trail closures, and/or temporary relocation of portions of trails
- Description of how the Council would comply with mitigation measures related to construction, including but not limited to noise and vibration, construction days (i.e., weekday or weekend) and hours (daytime or nighttime), and dust control measures

7.5 Disproportionately High and Adverse Effects

FTA C 4703.1 (Section 2.C.2, Determining Whether Adverse Effects are Disproportionately High) states that, in making determinations regarding disproportionately high and adverse effects on EJ communities, mitigation and enhancement measures that would be implemented and all offsetting benefits to the affected EJ communities may be taken into account.⁴⁰ 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).

As summarized above, both EJ and non-EJ communities would experience adverse impacts and benefits because of the Project. Given the abundance of EJ communities along the Project Alignment, they are likely to both reap the benefit of proximal, accessible transit as well as experience direct adverse impacts such as displacements. Some of these impacts would be borne more predominantly by EJ communities. Public input is required to develop meaningful mitigation measures and enhancements or betterments that will resonate with people who live, work, and have other ties to the community. The Council initiated this coordination effort when the conceptual design was finalized and will continue coordination to develop the final commitments, which will be presented in the Supplemental Final EIS and Amended ROD.

Given the Project details and findings to date and considering both the adverse impacts and benefits on EJ communities, the Project could have disproportionately high and adverse impacts to EJ communities. However, further consideration in accordance with the NEPA process would be needed to assess the potential for this finding in the Supplemental Final EIS. Two critical components of this process—meaningful coordination with EJ-specific communities and affected parties, and identification of mitigation measures to address Project impacts—are required and ongoing prior to making a final determination. These assessments would occur between the Supplemental Draft EIS and the Supplemental Final EIS.



7.6 Conclusion

When making an EJ determination, USDOT Order 5610.2 and FTA C 4703.1 direct project proponents to consider the impacts of a project and who may be affected, then consider the mitigation proposed for these impacts, and finally consider any offsetting benefits to EJ communities. The EJ study area for the Project was defined to identify communities that would be directly affected by the Project. The EJ study area captures communities that would experience both direct and indirect impacts, as well as benefits that the Project would provide. Populations within the EJ study area vary but are predominantly BIPOC, and in some places are predominantly low-income. Concentrations of EJ communities in the EJ study area are higher than in Hennepin County as a whole. The Project would travel along existing transportation corridors, which would minimize the impacts on all communities and make the greatest use of existing transportation infrastructure.

The Project would invest in an area that has experienced a history of systemic racism and disinvestment. The Project would have substantial and beneficial impacts on the utility of the transit network to the community in general and to EJ communities in particular, including the following:

- Improved connectivity, reliability, and access to LRT
- Better transit options linking affordable housing and jobs
- Improved regional mobility
- Improved access to jobs, education, recreation, and medical care
- Improved pedestrian/bicycle facilities, connectivity, and safety
- Decreased VMT of approximately 89,600 per day by year 2040, resulting in beneficial air quality effects
- Decreased energy use, and a system that would support local, regional, and State clean air goals

Impacts to EJ communities because of the operation of the Project would include property acquisitions and displacements, potential roadway crossing delays and removal of some on-street parking, effects on community character, noise and vibration impacts, potential indirect displacement effects, and potential for impacts during Project construction. Where appropriate, the Project has been and will continue to be refined through the NEPA process to avoid or minimize impacts to both the human and natural environments. Environmental avoidance and minimization commitments and committed mitigation measures address operational and construction-related adverse impacts that would affect both EJ and non-EJ communities. Similarly, the potential benefits provided by the Project would be experienced by EJ and non-EJ communities alike, both within the EJ study area and regionally.

Mitigation measures would be provided for impacts uniformly in all areas affected. Mitigation measures would address impacts to affected EJ communities and outreach to affected EJ communities and representatives is occurring as part of the efforts to avoid, minimize, and develop appropriate mitigation. The Council has and would continue to advance participation of BIPOC, low-income, and disadvantaged communities in the Project decision-making process through various strategies.

¹ Given that BIPOC populations represent a majority of residents, rather than a minority, in much of the EJ study area, this document uses BIPOC to refer to FTA's definition of "minority" persons, which includes persons who are American Indian and Alaska Native, Asian, Black or African American, Hispanic or Latino, and Native Hawaiian and other Pacific Islander.

² See [Environmental Justice FAQs | FTA \(dot.gov\)](#), accessed December 6, 2023.

³ A one-half-mile buffer around the entire Build Alternative Alignment was established as the EJ study area given guidance in FTA C 4703.1. One-half mile is also the average distance that users are willing to walk to access transit service and thus a one-half-



mile buffer around the Build Alternative Alignment represents the Project service area, and those who would directly benefit from the Project.

⁴ For reference, the federal poverty level for a family of four in 2021 was \$26,500, meaning that 200 percent of the federal poverty level for a family of four in 2021 was \$53,000.

⁵ [Environmental Justice - Guidance - Project Development - MnDOT \(state.mn.us\)](#)

⁶ This threshold methodology is adapted from the MnDOT’s transportation project development process EJ population identification methodology.

⁷ For reference, the federal poverty level for a family of four in 2021 was \$26,500, meaning that 200 percent of the federal poverty level for a family of four in 2021 was \$53,000.

⁸ MnDOT’s Transportation Project Development Process EJ methodology was used to define “meaningfully greater” and states that an EJ population 10 percentage points or greater than the established reference population is considered meaningfully greater.

⁹ See [Renters More Likely Than Homeowners to Spend More Than 30% of Income on Housing in Almost All Counties](#), accessed May 10, 2024.

¹⁰ CURA prepared for Hennepin County, *Blue Line Extension Anti-Displacement Recommendations* (Hennepin County 2023), <https://metro council.org/Transportation/Projects/Light-Rail-Projects/METRO-Blue-Line-Extension/Anti-Displacement-Efforts.aspx>.

¹¹ See [Racial Equity Framework for Transportation \(minneapolismn.gov\)](#), accessed December 6, 2023.

¹² See [Explore the map – Climate & Economic Justice Screening Tool \(geoplatform.gov\)](#), accessed December 7, 2023.

¹³ See Methodology & Data – Climate & Economic Justice Screening Tool (geoplatform.gov), accessed December 6, 2023.

¹⁴ See [Racial Equity Framework for Transportation](#) (minneapolismn.gov), accessed December 12, 2023.

¹⁵ Fair Housing Act, 42 USC § 3601 et seq. 1968. Accessed Oct. 11, 2022. <https://www.justice.gov/crt/fair-housing-act-1>.

¹⁶ Community Reinvestment Act, 12 USC § 2901 et seq. 1977. Accessed Oct. 11, 2022. <https://www.congress.gov/bill/95th-congress/senate-bill/406>.

¹⁷ Mapping Prejudice. University of Minnesota. Accessed Aug. 17, 2022. <https://mappingprejudice.umn.edu/>

¹⁸ Aradhya Sood, William Speagle, and Kevin Ehrman-Solberg, “Long Shadow of Racial Discrimination: Evidence from Housing Covenants of Minneapolis,” *SSRN*, 2019. https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3468520.

¹⁹ See [The Dakota People | Minnesota Historical Society \(mnhs.org\)](#) and [Dakota of Minnesota | Dakota Wicohan](#), accessed December 7, 2023.

²⁰ MnDOT, *Rethinking I-94 Phase 2 Draft Purpose and Need Summary Report Version 11*, accessed December 6, 2023. [Purpose and Need | Rethinking I-94 — Minneapolis to St. Paul | Let’s Talk Transportation - MnDOT \(state.mn.us\)](#)

²¹ See Bring Back 6th! Transform Olson Memorial Highway (ourstreetsmpls.org), accessed December 7, 2023.

²² All meetings and other resources related to this effort will be available at YourBlueLineExt.org/anti-displacement.

²³ <https://metro council.org/Transportation/Projects/Light-Rail-Projects/METRO-Blue-Line-Extension/Anti-Displacement-Efforts.aspx>.

²⁴ More information is available on the [Your Blue Line Extension website](#).

²⁵ Metropolitan Council, *US Census Data and Census 2020* (Saint Paul: Metropolitan Council, 2020), <https://metro council.org/Data-and-Maps/Research-and-Data/Census-Data.aspx>.

²⁶ The Census definition of poverty applied for residents is income below 185 percent federal poverty threshold or \$45,510 annual income for a family of four in 2017.

²⁷ City of Minneapolis, *Climate Action Plan* (Minneapolis: City of Minneapolis, 2013), <https://www2.minneapolismn.gov/media/content-assets/www2-documents/government/Minneapolis-Climate-Action-Plan.pdf>.

²⁸ City of Minneapolis, *Climate Action Plan* (Minneapolis: City of Minneapolis, 2013), <https://www2.minneapolismn.gov/media/content-assets/www2-documents/government/Minneapolis-Climate-Action-Plan.pdf>.



²⁹ Hennepin County, *Hennepin County 2040 Comprehensive Plan* (Minneapolis: Hennepin County, 2019), <https://www.hennepin.us/2040plan>.

³⁰ Hennepin County, *Hennepin County 2040 Comprehensive Plan* (Minneapolis: Hennepin County, 2019), <https://www.hennepin.us/2040plan>.

³¹ Department of Public Safety, Office of Traffic Safety - Minnesota Motor Vehicle Crash Facts, 2022. <https://dps.mn.gov/divisions/ots/reports-statistics/Documents/2022a-crash-facts.pdf>.

³² City of Minneapolis Street Design Guide Street Type Map. <https://sdg.minneapolismn.gov/street-types/street-type-map>.

³³ See [Safety Data - City of Minneapolis \(minneapolismn.gov\)](#), accessed December 6, 2023.

³⁴ See [APTA-2022-Public-Transportation-Fact-Book.pdf](#), accessed December 6, 2023.

³⁵ See [The Hidden Traffic Safety Solution: Public Transportation \(apta.com\)](#), accessed December 7, 2023.

³⁶ Metropolitan Council, *2040 Transportation Policy Plan* (Saint Paul: Metropolitan Council, 2020), <https://metrocouncil.org/Transportation/Planning-2/Key-Transportation-Planning-Documents/Transportation-Policy-Plan.aspx>.

³⁷ 49 CFR Part 24 Uniform Relocation Assistance and Real Property Acquisition for Federal and Federally-Assisted Programs. FHWA, 2005. <https://www.govinfo.gov/content/pkg/CFR-2012-title49-vol1/pdf/CFR-2012-title49-vol1-part24.pdf>

³⁸ Noise-sensitive land uses include residences and other places where people normally sleep, institutions, and land where quiet is an essential element of its intended purpose.

³⁹ A crossover is a railway track formation that allows a train to cross from one line to another. Gaps in the rails at crossovers generate around 6 dB of increased noise for locations close to the track. If crossovers are located in sensitive areas and cannot be moved, one approach is to use special trackwork, such as spring-rail, moveable point, or flange bearing frogs to eliminate the gap in the rail at the crossover.

⁴⁰ FTA C 4703.1 Environmental Justice Policy Guidance for Federal Transit Administration Recipients. 2012. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_EJ_Circular_7.14-12_FINAL.pdf