

**FEDERAL TRANSIT ADMINISTRATION  
REGION V**

**Finding of No Significant Impact and 4(f) Determination**

**Project:** Central Corridor Light Rail Transit Project – Construction of Three Infill Stations

**Applicant:** Metropolitan Council

**Location:** City of St. Paul, Ramsey County, Minnesota

**Purpose and Need**

The Central Corridor Light Rail Transit Project (LRT) is 10.9 miles long (9.7 miles of new alignment, 1.2 miles on shared alignment) and consists of 20 Central Corridor Light Rail Transit (LRT) stations – 15 new stations and five shared with the Hiawatha LRT. The Project will connect Minneapolis and St. Paul, and also includes the below-grade infrastructure for three infill stations in St. Paul. The above-grade construction of these stations was not included in the Project because of concerns by the Project sponsors regarding the impact of inclusion of the stations on the Project's Cost Effectiveness Index (CEI), which is used to determine if a project qualifies for federal funding.

Originally, a Record of Decision for this project was issued by the Federal Transit Administration (FTA) on August 18, 2009. The decision was based on the Central Corridor Light Rail Transit Project Final Environmental Impact Statement (FEIS) and Section 4(f) Evaluation published in June 2009. The proposed action covered by the ROD was for the implementation of 10.9 miles of light rail and building 15 new stations and the below-grade infrastructure for three future infill stations in St. Paul. A Section 106 Programmatic Agreement (PA) was included as an attachment to the ROD. The PA was signed by FTA, Advisory Council on Historic Preservation, Minnesota Historic Preservation Office, Metropolitan Council, Preservation Alliance of Minnesota, Prospect Park and East River Road Improvement Association, Historic St. Paul, St. Louis King of France Church, Central Presbyterian Church, St. Paul Heritage Preservation Commission, and the City of St. Paul. The PA provided mitigation measures for the design of specific stations and LRT elements for the project.

Subsequent to the issuance of the ROD, Metropolitan Council (MC) proposed to include the above-grade construction of the three infill stations. The three infill stations are located in the City of St. Paul between Snelling Avenue and Rice Street. This area is referred to as the Midway East segment. A mix of land uses is found in Midway East. Although University Avenue is predominately a commercial corridor, including small businesses, large regional shopping centers, small and large office and medical buildings, commercial warehouses, and automobile sales and service businesses, residential uses also exist on the Avenue, including some single-family homes. The Midway East segment also contains the highest concentrations of minority

populations. This area also has some of the highest rates of households and persons living in the Central Corridor LRT Project area.

The work includes all above-ground station features including: concrete platforms; overhead canopies and windscreens; communications conduit, wiring, and devices; electrical conduit, wire, and fixtures; railings; benches, leaning bars and trash receptacles; signage and ticket vending machines. The stations also will be tied into the system-wide communications and signals duct bank. The total duration for construction at the station location areas would be approximately six months. The addition of above-grade elements for the infill station is not anticipated to add to the total construction duration of the Project.

Because of the inclusion of the above-ground elements for the three stations, MC conducted an Infill Stations Environmental Assessment (EA) that evaluated the Project to ensure that the inclusion of these stations would not cause negative environmental impacts.

### **Alternatives Considered**

In order to address the Project's overall goals, particularly the goals of providing a cost-effective alternative to automobile travel and increased mobility for people living and working in the corridor, two alternatives were evaluated. The No Build Alternative, defined as construction of the Project as defined in the FEIS (which includes construction of below-grade infrastructure for three potential infill stations in the Midway East segment), and a Build Alternative, defined as construction of above-grade stations at one or more of the three potential infill stations in the Midway East segment at Western Avenue, Victoria Street, and Hamline Avenue.

### **Agency Coordination and Public Opportunity to Comment**

The Infill Stations Environmental Assessment (EA) was made available for public review on January 11, 2010. Two public hearings on the EA were held on January 27, 2010. Notifications of the EA and the public hearings appeared in area newspapers and were sent to stakeholders in the project corridor including local, regional, and state agencies. The EA was made available for viewing online and at area libraries prior to the public hearings. The hearings were attended by approximately 26 individuals. The public had an opportunity to review and comment on the EA from January 11 through February 10, 2010. During the public comment period, 61 comments were submitted by 17 individuals or organizations via stenographer record, e-mails, or letters. All comments have been addressed and a copy of the comments and associated responses is included in the EA. Copies of complete transcripts of both public hearings also are included in the EA. A summary of all comments and responses is included in Appendix A.

### **Environmental Effects and Mitigation**

MC will construct the three infill stations in accordance with the design features and mitigation measures for the other stations in the Midway East segment, as detailed in the ROD and the FEIS. This Finding of No Significant Impact (FONSI) only addresses measures as a result of the

EA and the revised preferred alternative. A list of the mitigation measures applicable to the three infill stations are detailed in the EA and are attached hereto as Appendix B.

### **Section 4(f) Determination**

Because no Section 4(f) properties are found within the vicinity of the three infill stations, and because construction of the above-grade elements of the potential infill stations would not require any additional right-of-way, their construction has no potential to use any Section 4(f) protected property. No additional use of Section 4(f) properties, beyond those documented in the ROD, are anticipated to occur with implementation of the Build Alternative; therefore, no additional mitigation beyond that committed to in the ROD is required.

### **Environmental Findings**

FTA served as the lead agency under the National Environmental Policy Act (NEPA) for the project. MC will construct the Project in accordance with the design features and mitigation measures presented in the ROD as issued by FTA in August 2009. MC prepared the EA in compliance with NEPA, 42 U.S.C. § 4321 et. seq., and with FTA's regulations, 23 C.F.R. Part 771. FTA has made an independent evaluation of the EA. The EA discusses the potential impacts of the project (i.e., the above-grade construction of the three stations) so that FTA may determine whether significant adverse impacts (DEQ 1508.27) are probable. If such a determination were made, an Environmental Impact Statement would need to be prepared.

After reviewing the EA and supporting documents, including public comments and responses made thereof, the FTA finds under 23 C.F.R. 771.121 that the proposed project (i.e., the above-grade construction of the three stations), with the mitigation to which MC has committed, will have no significant adverse impact on the environment. The record provides sufficient evidence and analysis for determining that an Environmental Impact Statement (EIS) is not required. This Finding of No Significant Impact (FONSI) only addresses environmental mitigation measures resulting from construction of above-grade elements of the three infill stations, as identified in the EA.

The FTA also finds, in accordance with Federal Transit Law at 49 U.S.C. §5324(b), that an adequate opportunity to present views was given to all parties with a significant economic, social, or environmental interest, that the preservation and the enhancement of the environment, and the interest of the community in which the project is located were considered.

In accordance with Section 106 of the National Historic Preservation Act, the FTA has determined that the Project does not result in any additional historical properties being affected from what was proposed in the FEIS dated June 2009.



Marisol R. Simón, Regional Administrator  
Federal Transit Administration

2-26-2010

Date

**APPENDIX A – SUMMARY OF COMMENTS AND RESPONSES**

## CENTRAL CORRIDOR INFILL STATIONS EA COMMENTS AND RESPONSES

No.	Subject*	Commenter	Group/ Affiliation	Comment	Response
<b>PUBLIC HEARING No. 1 January 27, 2010, 11:00 a.m., Hallie Q. Brown Community Center</b>					
1 A	G, S	Allan Lovejoy (for Mayor Christopher Coleman of St. Paul)	City of St. Paul, transportation planner	<p><i>[Read letter submitted in writing from Mayor Coleman of St. Paul]</i> My staff has advised me of the adequacy of the environmental assessment and that no additional mitigation is needed should these stations be constructed, and I concur that no additional mitigation is needed.</p> <p>The City has consistently and strongly supported the installation of these stations. As early as 2001, the community and city representatives recommended consideration of these three station locations for inclusion in the base LRT project.</p>	Comments noted.
1 B	E			<p>In the review and response on the draft Environmental Impact Statement of May 24th, 2006, the City not only recommended inclusion into the project but committed to doing station area plans for each one. Those plans are currently underway.</p>	<p>The Metropolitan Council supports and is actively participating in the City of St. Paul's Station Area Planning efforts. The city is preparing station area plans for all three infill stations. All mitigation actions committed to in the FEIS will be implemented.</p>
1 C	F			<p>In 2008, as a response to the aforementioned community concerns, the Metropolitan Council agreed to inclusion of all subsurface improvements needed at these three station locations as part of the base LRT project, and subsequently, in 2009, the city agreed to fund the above grade improvements for one of the stations. Finally, with the changes in federal policy with regard to the project scope, it appears that the project may now be able to incorporate all three stations into the base project.</p>	<p>The Metropolitan Council supports the City of St. Paul's funding commitments to construction of one of the three infill stations.</p>
2 A	S, C	Andrea Lubov	Jewish Community Action member of Stops for Us Coalition	<p><i>[Comments also submitted in writing.]</i> I can't begin to tell you how happy the other members of the coalition and I are that these three missing stops are going to be part of the line when it opens. But this promises only a very important first step in creating a light rail transportation link that will serve the community that will be most disrupted by its construction.</p> <p>We have listened to the Met Council tell us that the line needs to be built on time and on budget, and we have responded that the line also needs to serve the community, and a rail line that is only on time and on budget will not fulfill that purpose.</p>	<p>Comment Noted.</p> <p>Construction impacts are addressed in various sections of the EA under "Build Alternative - Other Issues Noted" or "Effects Noted" (for example, see Section 3.1.2, p. 3-4 of the EA). All mitigation actions committed to in the FEIS will be implemented.</p>

No.	Subject*	Commenter	Group/ Affiliation	Comment	Response
2 B	T, EJ			If bus service is reduced and parking disappears, these businesses will suffer, and economic collapse will be the unintended consequence of the hoped-for development.	Transportation impacts are addressed in Chapter 6.0 of the EA. Section 6.3 of the FEIS addresses on-street parking impacts. All mitigation actions committed to in the FEIS will be implemented.
2 C	T, C, MM, H			We've come a long way, but to achieve a light rail that meets the needs of the people it is supposed to serve, we need to mitigate the disruption of construction by providing low cost business loans, adding off-street parking, continuing the present level of service of the No. 16 bus, and develop more affordable housing.	See responses to comment 2 A (construction) and comment 2 B (transit and environmental justice, on-street parking) above. Section 6.3 of the FEIS addresses on-street parking impacts. All mitigation actions committed to in the FEIS will be implemented. The Metropolitan Council has awarded grants for affordable housing in the Central Corridor Project area. In 2008, the Council authorized a \$1,000,000 loan to assist the City of St. Paul with land acquisition along the Central Corridor devoted to affordable housing. In 2009, the Metropolitan Council approved \$448,800 for asbestos abatement at a vacant nursing home on Lexington Parkway North near the future CCLRT line. The building will be converted into 48 supportive apartments for people who have been homeless for a long time.

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2 D	PT, H, MM			<p>Gentrification of the area surrounding the University Avenue corridor is a bigger issue than the Metropolitan Council seems to realize. Gentrification has both positive and negative consequences.</p> <p>On the positive side, in the last 25 years, the area has become a home to a number of ethnic businesses that have collectively done a great job of beginning to revitalize the area, and that development can be enhanced if the Central Corridor light rail is built right.</p> <p>On the negative side, as property values rise, residents could be forced out of their homes as rent and property taxes rise. This is another area that needs mitigation. The area needs more affordable housing to replace housing units that will be lost, and we need a property tax moratorium in the area for present property owners. To discourage land speculation, any moratorium should not be passed on to people acquiring property after an agreed-upon date. All new housing construction must contain affordable units.</p>	<p>Property taxes and special assessments are outside the authority of the Metropolitan Council. The Metropolitan Council has awarded grants for affordable housing in the Central Corridor Project area. In 2008, the Council authorized a \$1,000,000 loan to assist the City of St. Paul with land acquisition along the Central Corridor devoted to affordable housing. In 2009, the Metropolitan Council approved \$448,800 for asbestos abatement at a vacant nursing home on Lexington Parkway North near the future CCLRT line. The building will be converted into 48 supportive apartments for people who have been homeless for a long time.</p>
2 E	EJ			<p>As a community, we need to protect the disadvantaged communities that will bear the greatest negative consequences of what can be a wonderful project and that will provide opportunities for the whole metropolitan area.</p>	<p>Environmental Justice populations and impacts are addressed in Section 3.1.5 of the EA. All mitigation actions committed to in the FEIS will be implemented.</p>
3 A	S	Anne White, Chair	District Councils Collaborative	<p><i>[Comments also submitted in writing by letter.]</i> My name is Anne White. I'm the chair of the District Councils Collaborative of Saint Paul and Minneapolis, which has been working with a broad coalition of community members and organizations for more than three years to ensure that the Central Corridor project includes stations at Western, Victoria and Hamline. So it's an especially sweet moment to testify on the Environmental Assessment of the three missing stations, following the announcement on Monday by Secretary of Transportation Ray LaHood that the three stations will be built as part of the project, so that people can get on the train every half mile at the eastern end of University Avenue when the rail line opens for business in 2014.</p>	<p>Comments noted.</p>

No.	Subject*	Commenter	Group/ Affiliation	Comment	Response
3 B	EJ, IC, C, T			<p>We are pleased that the Environmental Assessment acknowledges the importance of transit equity and recognizes, I quote, "...that the Project must adequately meet the needs of the transit-dependent populations living in proximity to the infill stations," end quote. However, since this Environmental Assessment is limited to analyzing the added impacts of building the above-ground stations, it doesn't provide any new analysis of cumulative impacts on environmental justice populations beyond what is offered in the Final Environmental Impact Statement, which we consider inadequate, as detailed in our FEIS testimony.</p> <p>Additional analysis is still needed to identify and quantify cumulative impacts on environmental justice populations due to LRT construction, loss of parking and gentrification. Mitigation strategies and other solutions must be developed to ensure that all can share in the benefits of the project.</p>	<p>See responses to comment 2 A (construction) and comment 2 E (environmental justice) above. Also see response to comment 2 B (transportation - targeted transit service plan), on-street parking above. Indirect and Cumulative Impacts are addressed in Chapter 8 of the EA.</p>
3 C	MM, EJ			<p>In line with the Met Council's commitment, reiterated in the Environmental Assessment, and I quote again, "to working toward resolution of community concerns that don't rise to the level of state or federal standards of adverse impacts," we urge the Met Council to work with project partners and the community to develop interdisciplinary programs with strategic investments to minimize displacement and offer wealth-building opportunities to impacted environmental justice populations. Local units of government are critical to this initiative and should be a full partner along with community-based organizations and potentially the foundation community. We may also find a good partner for this work in the new FTA-HUD-EPA Partnership for Sustainable Communities, which was set up precisely to help address these kinds of complex, multi-agency issues.</p>	<p>The Met Council has been and will continue to be an active partner with jurisdictions and agencies representing the Central Corridor communities in planning for and implementing strategies to achieve local development visions.</p>
3 D	T			<p>Another Met Council commitment we are pleased to see reiterated in the Environmental Assessment is to prepare a targeted transit service plan for the environmental justice community, to be completed at least six months before beginning revenue service operations, and we appreciate the provision for community input in the planning process for this and developing, quote, "measures of need as expressed by and as tailored for this transit-dependent community." This will help ensure that the neighborhoods at the eastern end of University Avenue have access to a choice of transit options that best serve their needs.</p>	<p>Section 6.1.1 of the EA addresses transit impacts, including bus service in the corridor. All mitigation actions committed to in the FEIS will be implemented. See response to comment 2 B (Transportation - targeted transit service plan) above.</p>



No.	Subject*	Commenter	Group/ Affiliation	Comment	Response
4	S	Jackie Cooper	aide to Ramsey County Commissioner Toni Carter	My name is Jackie Cooper and I'm the aide to Ramsey County Commissioner Toni Carter. She is here, but something occurred that needed her attention. But she wanted me to convey to you that she appreciates the hard efforts and work of the community, first and foremost, the Stops coalition, the District Councils Collaborative, Rondo, and if I'm forgetting any others, forgive me. But they worked arduously and hard and were very committed to making sure that this was a celebration, and I think we can really celebrate the fact that the three stops are going to happen; and I know for me, as a Rondo resident, I am thrilled.	Comments noted.
<b>PUBLIC HEARING No. 2 January 27, 2010, 6:00 p.m., Halile Q. Brown Community Center</b>					
5 A	H, PT	Bill Lemman	Jewish Community Action	We're a member of the transportation equity Stops for Us coalition, which represents a total of 67 constituency-based and/or citizen participation organizations. We're also part of this coalition that's been meeting for over a year that is also community based, and the city is part of it, too, to insure that there will be affordable housing along the Corridor; and I guess mostly what I'd like to talk about in the short time I have is that we know probably most – that there will be people who buy properties for development, and I think it's real important to take into consideration the necessity of keeping the housing that's there, affordable housing that exists on the Corri – the Corridor, to continue having affordable housing. We also know that we're going to need more affordable housing, and what better place to put it than along an LRT line where people can easily access job opportunities.	Comments noted. See responses to comments 2 C (affordable housing) and 2 D (property taxes) above.
5 B	E, H			There – these new developments hopefully will be, with the help of the city, mixed income developments, maybe even mixed use with businesses on the side; and I think when we're talking – I know that today is mostly about the stations that have been added, which we fought for a long time, and now, of course, they're actually going to happen. But even as part of that, when the stations are built, where they're going to be built, how they're going to be built, and the access for people is real important for people who have no other way of getting around other than walking. So I think we need to always keep in mind the affordable housing.	Comments noted. See responses to comment 1 B (economic development and station area planning) and comment 2 C (affordable housing) above.
5 C	P			And the last thing I'd like to say is that it's great to have something like this where you hear what people say, but so often government agencies have the idea that they know what's best for people, and they listen to what people say but tend to ignore it, and you're going to hear a lot of people from a lot of different organizations talk about what's needed on the Corridor, and I think that it's real important to take that into consideration, that if you really want to know what's best for the people along the Corridor, ask the people along the Corridor, don't tell people what is best for them, listen to them and work with them.	Public participation is a requirement of the National Environmental Policy Act (NEPA) for preparation of environmental documents. The public participation process efforts and the opportunities it provides are detailed in Chapter 11 of the FEIS and summarized in Chapter 9.0 of the EA. The public hearings and 30-day comment period for the EA are part of this process.

No.	Subject*	Commenter	Group/ Affiliation	Comment	Response
6	S	David Greene	Isaiiah (church coalition)	So we've been working with the Stops for Us coalition for three years or more, quite a long time, on these stations; and the first thing I want to do is give some thanks where — where it's greatly deserved, first for Ramsey County for funding this Environmental Impact Study, the Met Council and the staff for expediting this — this process, and the Federal Transit Administration and the U.S. Department of Transportation, particularly Secretary LaHood and Administrator Rogoff for taking the leadership in making the changes necessary to allow these stations to go forward.	Comments noted.
6B	T			The three stations will certainly improve the equity of access on Central Corridor. However, the planned reduction in Route 16 frequency is unacceptable. The elderly, the disabled, parents with small children, lots of other people find walking even a quarter mile a real challenge; and now that the rules have been changed, cost effectiveness has been given what we believe is its proper role in project evaluation, we should as a community be able to make the choice to maintain or increase that Route 16 frequency to make sure that our most transit-dependent communities have the same access that they do today.	See response to comment 2 B (transportation - targeted transit service plan) above.
6 C	T, PT			Including the three stations is very positive, but it also adds some challenges. We're going to need more north/south connecting bus service, we need a real concrete plan for circulators and shuffling people to those stations, and the community development impacts that are going to come with those stations need to be mitigated to avoid gentrification and displacement of current residents.  We'll be submitting more complete comments in writing. <b>[No written comments received within comment period.]</b>	See responses to comment 2 B (transportation - targeted transit service plan) and comment 2 D (property taxes) above. Also see response to comment 1 B (economic development and station area planning) above.
7 A	S	John Slade	MICAH (Metropolitan Interfaith Council on affordable Housing)	<b>[Comments also submitted in writing - no copy received]</b> We applaud the recent actions to build the three missing stations.	Comment noted.

No.	Subject*	Commenter	Group/ Affiliation	Comment	Response
7 B	EJ, MM			<p>We have some concerns that we'd like to raise at this time.</p> <p>As of today, the Environmental Impact Statement still says there is no disparate impact on the communities on the eastern end of the line. We think there are disparate impacts, some serious ones, that need mitigations.</p>	<p>See response to comment 2 E (environmental justice) above.</p> <p>All mitigation actions committed to in the FEIS will be implemented. The potential adverse effects of the Central Corridor Light Rail Transit (CCLRT) project including the three infill stations are identified and analyzed in the FEIS and EA. These documents indicate that there are no "high and adverse" effects on minority and/or low income populations. Moreover, the detailed analysis demonstrates that (1) the potential adverse effects are not predominantly borne by a minority or low income population (the potential adverse effects are shared by all populations along the proposed route, including non-minority and non-low-income populations); and (2) the potential adverse effects suffered by the minority or low-income populations are not appreciably more severe or greater in magnitude than the adverse effects that will be suffered by other populations along the proposed route.</p> <p>Moreover, the substantial benefits that will accrue to the minority, low-income, and transit dependent populations more than offset nearly all of the potential adverse impacts of the CCLRT project. Among other benefits, the project will provide increased transit access to employment and activity centers, significant travel time savings, and the creation of jobs through new development along the route.</p>
7 C	E, EJ			<p>While the University of Minnesota has labs that might be shaken by the rail and Minnesota Public Radio has studios that might be shaken by the rail, the communities of color and low income that this project runs through are going to be shaken as well. Neighborhood stability and connection will be impacted negatively by this project, and we are very concerned over the negative impact of gentrification. We define these as the involuntary economic pressures that displace current residents and change the neighbor – the nature of neighborhoods.</p>	<p>See response to comment 2 E (environmental justice) above. All mitigation actions committed to in the FEIS will be implemented. Also see response to comment 2 C (affordable housing) and response to comment 1 B (economic development and station area planning) above.</p>
7 D	PT, MM			<p>We are a part of the Save Our Homes coalition, and we are calling for mitigation to protect current residents, both homeowners and renters, from rail-related increases to property taxes and rents. We are calling for a Save Our Homes Community Fund, which would pay the difference between a baseline tax rate and the gentrification-impacted tax rate for all homes and participating resident properties, resident rental properties between Prior and the State Capitol, one-half mile north and south of University Avenue.</p> <p>We're calling for this to be funded by the project budget with a match from the City of St. Paul. We suggest that this be available to homeowners at or below 80 percent of the area median income, and landlords who agree to a 15-year rent stabilization compact, pegged to citywide rent increases.</p>	<p>See response to comment 2 D (property taxes and special assessments) above.</p>

No.	Subject*	Commenter	Group/ Affiliation	Comment	Response
8 A	PT, S	Rena Moran	St. Anthony Neighborhood Development Corporation, Rondo community organizer, Summit University Planning Council Board member, homeowner	<p>And so I stand here today as a homeowner, concerned about the impact that – you know, it was just the construction of LRT comes into the community and the impact it will have on homeowners and increased property taxes, but there is so much more – you know, we add these three additional stops, fantastic, the LRT, fantastic. But the impact that it can have on not only property taxes is special assessments and those who live closest to those new stops.</p> <p>We are a community of people who are really transit dependent, but we are also a community of people at a – a certain means of income, and really believe that because of that, that the impact socially, economically can really, as John says – well, I'm also a – I'm a leader in that Save Our Homes campaign, just as people who are residents, renters and homeowners who recognize that when transit comes to our community the impact it has on current residents, and really feel that either we are going to be forced to move because of rising property value. You know, our income is not going to change, but surely property taxes will and assessments. People will be either going to foreclosure as they try to save themselves and their homes, and this is not really more about the stations or the infills but more about sustaining families, how do we do this project so that it's not going to impact our community members, and sustain families. Thank you.</p>	Comments noted.
9 A	SS	Keith W. Swan	corridor resident, and fiancée of Evelyn Randle, a corridor homeowner	<p>Unfortunately, I'm unemployed, and my concern is that, one, that when the light rail goes through that there will be a safety issues concern. My concern is about the young people, the elderly and the handicapped being injured along the light rail.</p>	<p>Safety and Security are addressed in Section 3.2.3. of the EA, and are addressed in detail in Section 3.7 of the FEIS. Section 3.7.5 of the FEIS describes mitigation commitments for the LRT, which will also apply to construction and operation of the infill stations, as described in the EA. The safety measures address impacts to LRT users, area residents, visitors, and construction workers, and provide for implementation of the Safety and Security Management Plan adopted by the Metropolitan Council in 2008.</p>
9 B	H			<p>My other concern is that jobs, sustaining affordable housing for the cor – in the Corridor.</p>	<p>See response to comment 2 C (affordable housing) above.</p>
9 C	T			<p>Another concern is parking. Is there going – displaced homes for people because of parking, because I know there's going to be no longer parking on University Avenue, and I think it will be unfair for the people that live on the north and south end of those – of the light rail that have to be displaced from their homes so they can make parking space.</p> <p>There's plenty empty lots, there's buildings that could probably be – that are not worth saving that could be taken out to provide parking, and people that live east and west of those stops shouldn't have to pay parking fees because of the light rail.</p>	<p>See response to comment 2 B (transit and environmental justice, on-street parking) above.</p> <p>Section 6.3 of the FEIS addresses on-street parking impacts. All mitigation actions committed to in the FEIS will be implemented.</p>

No.	Subject*	Commenter	Group/ Affiliation	Comment	Response
10 A	PT	Roger Banks	Research and policy analyst, State Council of Black Minnesotans	<p>Within that particular context, the Young Sister Moran hit on a very critical issue for us, and that is taxation, and what has happened historically with the implementation of particular programs, and I'll cite the community benefits agree – not the community benefits, but the community block grant programs that were around about 15 years ago, whatever.</p> <p>The way that that was implemented in St. Paul made it very difficult for the residents. They were forced to relocate from this particular area, principally because of the tax evaluation of the properties, et cetera, and the ability to not be able to pay those taxes; and so what we're concerned about is while the statements, the impact statements from our perspective are – are static, what we need is ongoing analysis regarding the overall impact that these – this kind of project will have on the taxation, taxes of our people in this – the residents of this particular – I'm saying this because when this happened historically is that we have been pretty much – that – that taxes have been used as a mechanism for relocation;</p>	See responses to comment 2 D (property taxes) and comment 1 B (economic development and station area planning) above.
10 B	C, MM, EJ (jobs)			<p>You know, for example, in the employment sector, one of the things that we want to know is how many residents by – by ethnicity, get jobs in this particular project and what's the nature of those kind of jobs, how many – what did this do relative to – to populations becoming members of unions, because the whole range of particular kinds of jobs that are going to be available are union construction jobs, union technicians, et cetera; and so we need to know that the people from this community are benefiting and have some mechanism for moving upward. Because what's happening now is that, from my perspective, all they're doing for the community is planning for low-level jobs; and, you know, if we're going to stay in this neighborhood, we're going to be able to need the kind of jobs and the kind of education and – and employment opportunities that lead to upward – significant upward mobility for our residents.</p>	Short-term (construction-related) employment is addressed in Section 5.2.1 of the EA, and long-term (operations-related) employment is addressed in Section 5.2.2 of the EA. Met Council has established DBE and workforce goals and collaborated with a variety of groups including members of the PBHRC. The result of this collaboration was two African American workforce events on October 14, 2009 with over 250 in attendance.
11	PT, E	Evelyn Randle	Corridor homeowner, business owner	<p>After listening to Mr. Banks speak, I'm not only a homeowner, but I also own a business, and my concern is about the small businesses in this community.</p> <p>It's good that the light rail is going to generate more people coming in the community, but my concern is will the taxes be so high that the mom-and-pop shops get lost and will we have to move our businesses?</p> <p>So that's my concern, not only as a homeowner, but as a business owner, I'm concerned about the small businesses being able to stay in the community.</p>	See responses to comment 2 D (property taxes) and comment 1 B (economic development and station area planning) above.

No.	Subject*	Commenter	Group/ Affiliation	Comment	Response
<b>WRITTEN COMMENTS RECEIVED DURING COMMENT PERIOD, January 9 - February 10, 2010</b>					
12 A	S	Emily Jane Seru	Corridor resident	[Comment received by e-mail] As a Frogtown resident (825 Charles Avenue) who lives and works on University Avenue in Saint Paul, I am a strong supporter of building all three additional stops along the corridor. It seems to me that with all the investment we are putting into the line, including building the understructure for the additional stops, it makes sense that we complete the job and build all three stations at Western, Victoria and Hamline.	Comments noted.
12 B	T			In addition to the many studies that have shown that the communities to be impacted with these stations being left out are the poorest, most racially diverse along the line with the highest ridership, I also want to paint the picture from my own life experience.  I take the number 16 bus many mornings to work on the corner of University and Victoria. My husband and I share a car, he is in graduate school at the University of Minnesota and also takes the #16 two to three times a week. We have a 10 month old son. The number 50 would be a more direct and quicker route, but to get the #50 express bus I would have to walk about a half a mile. Now this does not seem like a long walk if you have in mind Minnesota in the fall or summer with nothing to carry, and I am in my 30's. However, when you imagine the cold winds of the past few weeks, and a bunch of books, laptop, lunch, breast pump, and workout clothes that I must take with me everyday, the walk starts to seem pretty long and hard. I wait for the 16 bus instead even if it takes me a bit longer to get to work. On many occasions this winter, while waiting for the #16, I have thought about the three little old ladies who live on my block. None of them have cars, all of them live alone. They all do their shopping using the #16 bus. I never see them in the winter time. They have food delivered to them. I think about what it would be like for them to have fewer busses stopping at Victoria and University, and to have the train run right on past us to the Lexington or Dale stops. It makes my reasons for wanting a stop on Victoria trivial compared to how it could benefit them, especially if we cleared the ice and snow from the sidewalks and corners!	See response to comment 2 B (transportation - targeted transit service plan) above. Section 6.1.1 of the EA addresses transit impacts, including bus service in the corridor. All mitigation actions committed to in the FEIS will be implemented.
13 A	S	Joan Vanhala	Coalition Organizer, Alliance for Metropolitan Stability (AMS)	[Comment received by letter] The inclusion of the full build out of the three infill stations into the Central Corridor LRT project is a great step forward towards racial equity for this major transportation infrastructure investment.	Comments noted.

No.	Subject*	Commenter	Group/ Affiliation	Comment	Response
13 B	EJ			<p>The Environmental Assessment states "the long-term and short-term adverse impacts disproportionately borne by minority and low-income populations would be the same as those identified in the FEIS". At the Alliance we continue to assert the environmental justice communities are impacted disproportionately. The Central Corridor LRT project must include more accurate and in depth assessment of the impacts on the environmental justice communities within the Midway East Segment.</p>	<p>The potential adverse effects of the Central Corridor Light Rail Transit (CCLRT) project including the three infill stations are identified and analyzed in the FEIS and EA. These documents indicate that there are no "high and adverse" effects on minority and/or low income populations. Moreover, the detailed analysis demonstrates that (1) the potential adverse effects are not predominantly borne by a minority or low income population (the potential adverse effects are shared by all populations along the proposed route, including non-minority and non-low-income populations); and (2) the potential adverse effects suffered by the minority or low-income populations are not appreciably more severe or greater in magnitude than the adverse effects that will be suffered by other populations along the proposed route.</p> <p>Moreover, the substantial benefits that will accrue to the minority, low-income, and transit dependent populations more than offset nearly all of the potential adverse impacts of the CCLRT project. Among other benefits, the project will provide increased transit access to employment and activity centers, significant travel time savings, and the creation of jobs through new development along the route.</p>
13 C	EJ			<p>DCC also states "Title VI analysis identifies the entire corridor as a low income, high minority area and therefore determines that, with the exception of three blocks near Western Avenue, the project imposes no disproportionate impacts, and requires no mitigation for the Environmental Justice neighborhoods at the eastern end of University Avenue. A refined analysis would disclose additional geographic pockets where low-income or minority populations are concentrated and inform development of appropriate mitigation." The Stops for Us mapping project based on the census block group level clearly shows that there is a specific concentrated area for minority and low income populations in the Midway East Section. See map attached at the end of this document.</p>	<p>See response to comment 13 B (environmental justice) above.</p>

No.	Subject*	Commenter	Group/ Affiliation	Comment	Response
13 D	T			The Metropolitan Council's commitment to "a full analysis of these effects... as part of completing the targeted transit service plan required as mitigation for environmental justice impacts identified in the FEIS" provides the prime opportunity to conduct a more detail assessment. We recommend that the Metropolitan Council, along with its project partners the city of St. Paul and Ramsey County Regional Rail Authority, enhance this targeted transit plan by working with the community to develop an in-depth analysis of the environmental justice communities as called for by the Concerned Asian Business Owners (CABO) and the Preserve and Benefit Historic Rondo Committee (PBHRC) in their civil rights complaints.	See response to comments 2 B (transportation - targeted transit service plan) and 13 B (environmental justice) above.
13 E	EJ, MM			We also assert that the Metropolitan Council has been remiss in its responsibility to address the environmental justice communities' concerns and in its responsibility to facilitate solutions with the appropriate governmental bodies. Although the Metropolitan Council has argued that the subject of these solutions are outside its jurisdiction, as the project manager it is nevertheless the Metropolitan Council's responsibility to lead comprehensive efforts to construct a Central Corridor LRT line that benefits all communities. With this level of community partnership, we believe the Central Corridor LRT project can be a model for effective transportation investments in this transitional time of federal policy change.	See response to comments 2 D (Metropolitan Council authority) and 13 B (environmental justice) above.
13 F	IC, T			As referenced in the Record of Decision, the "U.S. EPA recommended specific plans for loss of on-street parking; completion of the three additional stations at Hamline Avenue, Victoria Street and Western Avenue, and continued discussions with the Rondo community about cumulative impacts of the project on community cohesion and function." In the EA, the Metropolitan Council supports its commitment in the FEIS "to working toward resolution of community concerns that don't rise to the level of state or federal standards of adverse impacts." With the addition of the three missing stations into the project, the time is overdue for the Metropolitan Council to act on these other two U.S. EPA recommendations.	See response to comment 2 B (transportation - targeted transit service plan) above. The City of St. Paul completed its Central Corridor Development Strategy (CCDS), which "establishes a vision and set of strategies for how the Central Corridor should grow and change over the next 25-30 years in response to the LRT investment" (City of St. Paul, 2007). Consistent with the CCDS and the other Central Corridor stations, station area land use plans for the three potential infill stations at Western Avenue, Victoria Street, and Hamline Avenue have been under development by the City of St. Paul since Fall 2009 and are expected to be completed prior to construction of the above-grade elements of the stations.
13 G	H, T, EJ			During this transitional time of federal transportation policy, the Central Corridor Community Agreement Coordinating Committee provides the foundation for the future equitable development of the Central Corridor LRT. Its community principles and recommendations include community engagement; livability and cohesion; equitable development and affordable housing; transportation equity; equitable workforce goals; support and growth of small businesses; and environmental sustainability. These recommendations are more specifically expanded on in an 84 page draft community statement.	See responses to comments 2 B (transportation - targeted transit service plan), 2 C (affordable housing), and 2 E (environmental justice) above.



No.	Subject*	Commenter	Group/ Affiliation	Comment	Response
13 H	S, T, C, PT, H, CC			<p>It is possible to address the EJ communities' issues. In fact, much of the work to address the adverse impacts of the Central Corridor LRT in EJ communities has begun through the efforts of the city of St. Paul. We see the key issues to be addressed from both civil rights complaints to be:</p> <ul style="list-style-type: none"> <li>• Insufficient data and analysis</li> <li>• Transit access: Inclusions of the 3 additional stations and retain existing bus service.</li> <li>• Loss of on-street parking for businesses</li> <li>• Residential parking impacts</li> <li>• Small business retention during and post construction</li> <li>• Small business development opportunities</li> <li>• Displacement of renters and homeowners</li> <li>• Creation of new affordable housing opportunities</li> <li>• Mitigation of division and isolation of existing communities</li> <li>• Creation of job opportunities for current residents especially minorities and low income</li> <li>• Neighborhood livability</li> </ul>	See responses to comments 2 A (construction), 2 B (transportation - targeted transit service plan, 2 C (affordable housing), 2 D (Metropolitan Council authority), and 13 F (station area planning) above.
13 I	S			<p>In closing we would like to say a sincere thank you to Secretary LaHood, FTA Administrator Peter Rogoff, the city of St. Paul, Counties Transit Improvement Board, and the Central Corridor Funders Collaborative for realizing the hard work of the Stops for Us coalition and providing the means necessary to include the three stations at Hamline, Victoria, and Western in the Central Corridor LRT project.</p>	Comment noted.
14 A	S, P	Kenneth A. Westlake, Supervisor, NEPA Implementation, Office of Enforcement and Compliance Assurance	U.S. Environmental Protection Agency, Region 5	<p><i>[Comment received by letter]</i> EPA has previously participated in scoping and review of the NEPA documents for this project, including our July 28, 2009 comment letter on the project Final Environmental Impact Statement (FEIS). We commend your agency and the Metropolitan Council for developing and refining the Central Corridor Project. One goal of the NEPA process is to bring public information and insights to project planning. The present EA is evidence that the NEPA process has contributed significantly to this project.</p>	<p>Comment noted.</p> <p>The public participation process efforts and the opportunities it provides are detailed in Chapter 11 of the FEIS and summarized in Chapter 9.0 of the EA. See response to comment 5 C above.</p>
14 B	V			<p>We concur with the EA's conclusion that the aboveground superstructures for the three additional stations will not significantly impact the communities and environment beyond those impacts already addressed in the FEIS and Record of Decision for the below-grade infrastructures. We support the proposed efforts to work with the local communities related to these stations in designing the streetscapes for each setting.</p>	<p>Section 3.6.6 of the FEIS details mitigation commitments required for construction of the LRT line. All mitigation committed to in the FEIS will be implemented. See response to comment 13 F (station area planning) above.</p>

No.	Subject*	Commenter	Group/ Affiliation	Comment	Response
15 A	S	Sarah E. Huelskoetter	corridor resident	<i>[Comment received by letter]</i> Please make the three infill stations on the Central Corridor a reality. The stops at Hamline, Victoria, and Western Avenues are crucial for me and my neighbors.	Comment noted.
15 B	PT, T			Although they will not negate the damage that rising property costs and lost on-street parking will do to the businesses and families in my neighborhood, the three proposed infill stations will alleviate some of the extra stress that the reduced bus service will bring.  I work on University Avenue by the Capitol, and frequently use the 16 bus to get to work, or to shop in the Midway, which has the closest Target, post office (on Federal St. and Concordia), and Cub Foods to our house. I am young. I often walk to work, and if I have to walk half a mile to the light rail with my arms full of groceries, I probably can. However, the group of developmentally disabled adults that live next door certainly can't, and neither can my very elderly neighbor on the other side.	See responses to comment 2 D (property taxes) and 2 B (transportation - targeted transit service plan) above. All mitigation actions committed to in the FEIS will be implemented
15 C	S, IC			We need these infill stations. Please help us to avoid repeating the devastation to the Rondo neighborhood. Thank you for your time and for the work you do.	Comment noted. See response to comment 3 B (indirect/cumulative) above.
16 A	S, F	Carol Swenson, Executive Director	District Councils Collaborative	<i>[Comment received by letter]</i> The DCC is pleased to see an Environmental Assessment (EA) of above ground construction of stations at Western Avenue, Victoria Street, and Hamline Avenue as part of the Central Corridor Light Rail Transit (CCLRT) Project. The DCC identified the absence of these stations as a primary community concern throughout the National Environmental Policy Act (NEPA) review of the proposed CCLRT project. We are delighted that the Federal Transit Administration, the Metropolitan Council, and other Central Corridor Project Partners have responded to this concern and are clearing the path for full construction of these stations as part of the project scope. We also would like to acknowledge the Ramsey County Regional Rail Authority who provided funding to complete the Environmental Assessment.	Comments noted.  The Metropolitan Council supports Ramsey County Regional Rail Authority's funding commitment to complete the Environmental Assessment.

No.	Subject*	Commenter	Group/ Affiliation	Comment	Response
16 B	T, EJ			<p>We are pleased that the Environmental Assessment acknowledges the importance of transit equity and recognizes "... that the Project must adequately meet the needs of the transit dependent populations living in proximity to the infill stations." However, we note that the EA provides no new analysis of impacts on environmental justice populations over and above what is offered in the Final Environmental Impact Statement and concludes that environmental justice communities will be minimally impacted by the project.</p> <p>The DCC maintains its previous position that, barring a more robust analysis, it is premature to arrive at this conclusion. As put forth in civil rights complaints filed by Concerned Asian Business Owners and Preserve and Benefit Historic Rondo Committee, additional analysis is still needed to identify and quantify impacts on environmental justice populations due to LRT construction, loss of parking, gentrification, and other factors affiliated with light rail transit projects.</p>	<p>See response to comment 2 B (transportation - targeted transit service plan) above. All mitigation actions committed to in the FEIS will be implemented. See response to comment 13 B (environmental justice) above.</p>
16 C	IC, EJ			<p>The Environmental Protection Agency, in its comments on the FEIS, which are referenced on page 7 of the Record of Decision, also calls for ongoing conversations with environmental justice communities about "cumulative impacts on community cohesion and function." (The Environmental Justice Toolkit developed by the Baltimore Region Environmental Justice in Transportation Project with assistance from the U.S. Environmental Protection Agency and the Federal Highway Administration offers one example of the type of rigorous analysis and community involvement needed in Central Corridor — <a href="http://www.scribd.com/doc/9272794/Environmental-Justice-Toolkit-Volume-1">http://www.scribd.com/doc/9272794/Environmental-Justice-Toolkit-Volume-1</a>.)</p>	<p>See responses to comments 3 B (indirect/cumulative) and 13 B (environmental justice) above.</p>

No.	Subject*	Commenter	Group/ Affiliation	Comment	Response
16 D	EJ, MM			<p>Mitigation strategies and other solutions to alleviate negative impacts on environmental justice communities must be developed to ensure that all can share in the benefits of the project. In the EA, the Met Council reiterates its commitment "to working toward resolution of community concerns that don't rise to the level of state or federal standards of adverse impacts." In keeping with this commitment, we urge the Met Council to work with project partners and the community to develop interdisciplinary programs with strategic investments to minimize displacement and offer wealth-building opportunities to impacted environmental justice populations.</p> <p>Local units of government are critical to this initiative and should be full partners along with community based organizations and potentially the foundation community. We may also find a partner for this work in the new FTA-HUD-EPA Partnership for Sustainable Communities, which was set up to help address these kinds of complex, multi-agency issues.</p> <p>Finally, over the past year, community members, small businesses, organizations, and local units of government have been engaged in a process that we believe will result in a Central Corridor Community Agreement(s). This agreement(s) is intended to provide the framework and vehicle in which solutions to community concerns can be implemented and all partners can be held accountable. The Met Council has been invited to be a part of this initiative as it continues to move forward and has shown preliminary interest.</p>	See responses to comment 2 B (transportation - targeted transit service plan), 2C (FTA-HUD-EPA), and 13 F (station area planning) above.
16 E	T			<p>Another Met Council commitment we are pleased to see reiterated in the Environmental Assessment is to prepare a targeted transit service plan for the environmental justice community, to be completed at least six months before beginning revenue service operations. We appreciate the provision for community input in the planning process and in developing "measures of need as expressed by and as tailored for this transit-dependent community." This will help ensure that the neighborhoods at the eastern end of University Avenue have access to a choice of transit options that best serve their needs.</p>	See response to comment 2 B (transportation - targeted transit service plan) above. All mitigation actions committed to in the FEIS will be implemented.
16 F	S			<p>In conclusion, we would like to express our hope that, with the inclusion of the three stations and the development of strategies to help residents and businesses remain in place, the Central Corridor will truly be a model for future transportation projects, as Secretary LaHood said at his Central Corridor press conference on Monday, January 25, 2010.</p>	Comments noted.

No.	Subject*	Commenter	Group/ Affiliation	Comment	Response
17 A	S	Vic Rosenthal	Jewish Community Action	<i>[Comment received by email]</i> The inclusion of the full build out of the three infill stations into the Central Corridor LRT project is a great step forward towards racial equity for this major transportation infrastructure investment.	Comments noted.
17 B	EJ			The Environmental Assessment states "the long-term and short-term adverse impacts disproportionately borne by minority and low-income populations would be the same as those identified in the FEIS". At the Alliance we continue to assert the environmental justice communities are impacted disproportionately. The Central Corridor LRT project must include more accurate and in depth assessment of the impacts on the environmental justice communities within the Midway East Segment.	See response to comment 13 B (environmental justice) above.
17 C	EJ			DCC also states "Title VI analysis identifies the entire corridor as a low income, high minority area and therefore determines that, with the exception of three blocks near Western Avenue, the project imposes no disproportionate impacts, and requires no mitigation for the Environmental Justice neighborhoods at the eastern end of University Avenue. A refined analysis would disclose additional geographic pockets where low-income or minority populations are concentrated and inform development of appropriate mitigation." The Stops for Us mapping project based on the census block group level clearly shows that there is a specific concentrated area for minority and low income populations in the Midway East Section. See map attached at the end of this document.	See response to comment 13 B (environmental justice) above.
17 D	T			The Metropolitan Council's commitment to "a full analysis of these effects... as part of completing the targeted transit service plan required as mitigation for environmental justice impacts identified in the FEIS" provides the prime opportunity to conduct a more detail assessment. We recommend that the Metropolitan Council, along with its project partners the city of St. Paul and Ramsey County Regional Rail Authority, enhance this targeted transit plan by working with the community to develop an in-depth analysis of the environmental justice communities as called for by the Concerned Asian Business Owners (CABO) and the Preserve and Benefit Historic Rondo Committee (PBHRC) in their civil rights complaints.	See response to comments 2 B (transportation - targeted transit service plan) and 13 B (environmental justice) above.

No.	Subject*	Commenter	Group/ Affiliation	Comment	Response
17 E	EJ, MM			We also assert that the Metropolitan Council has been remiss in its responsibility to address the environmental justice communities' concerns and in its responsibility to facilitate solutions with the appropriate governmental bodies. Although the Metropolitan Council has argued that the subject of these solutions are outside its jurisdiction, as the project manager it is nevertheless the Metropolitan Council's responsibility to lead comprehensive efforts to construct a Central Corridor LRT line that benefits all communities. With this level of community partnership, we believe the Central Corridor LRT project can be a model for effective transportation investments in this transitional time of federal policy change.	See response to comments 2 D (Metropolitan Council authority) and 13 B (environmental justice) above.
17 F	IG, T			As referenced in the Record of Decision, the "U.S. EPA recommended specific plans for loss of on-street parking, completion of the three additional stations at Hamline Avenue, Victoria Street and Western Avenue, and continued discussions with the Rondo community about cumulative impacts of the project on community cohesion and function." In the EA, the Metropolitan Council supports its commitment in the FEIS "to working toward resolution of community concerns that don't rise to the level of state or federal standards of adverse impacts." With the addition of the three missing stations into the project, the time is overdue for the Metropolitan Council to act on these other two U.S. EPA recommendations.	See response to comment 2 B (transportation - targeted transit service plan) and 13 F (station area planning) above.
17 G	H, T, EJ			During this transitional time of federal transportation policy, the Central Corridor Community Agreement Coordinating Committee provides the foundation for the future equitable development of the Central Corridor LRT. Its community principles and recommendations include community engagement, livability and cohesion; equitable development and affordable housing; transportation equity; equitable workforce goals; support and growth of small businesses; and environmental sustainability. These recommendations are more specifically expanded on in an 84 page draft community statement	See responses to comments 2 B (transportation - targeted transit service plan), 2 C (affordable housing), and 2 E (environmental justice) above.

No.	Subject*	Commenter	Group/ Affiliation	Comment	Response
17 H	S, T, C, PT, H, CC			<p>It is possible to address the EJ communities' issues. In fact, much of the work to address the adverse impacts of the Central Corridor LRT in EJ communities has begun through the efforts of the city of St. Paul. We see the key issues to be addressed from both civil rights complaints to be:</p> <ul style="list-style-type: none"> <li>• Insufficient data and analysis</li> <li>• Transit access: Inclusions of the 3 additional stations and retain existing bus service.</li> <li>• Loss of on-street parking for businesses</li> <li>• Residential parking impacts</li> <li>• Small business retention during and post construction</li> <li>• Small business development opportunities</li> <li>• Displacement of renters and homeowners</li> <li>• Creation of new affordable housing opportunities</li> <li>• Mitigation of division and isolation of existing communities</li> <li>• Creation of job opportunities for current residents especially minorities and low income</li> <li>• Neighborhood livability</li> </ul>	<p>See responses to comments 2 A (construction), 2 B (transportation - targeted transit service plan, 2 C (affordable housing), 2 D (Metropolitan Council authority), and 13 F (station area planning) above.</p>
17 I	S			<p>In closing we would like to say a sincere thank you to Secretary LaHood, FTA Administrator Peter Rogoff, the city of St. Paul, Counties Transit Improvement Board, and the Central Corridor Funders Collaborative for realizing the hard work of the Stops for Us coalition and providing the means necessary to include the three stations at Hamline, Victoria, and Western in the Central Corridor LRT project.</p>	<p>Comment noted.</p>
18	EJ, E, MM, H, PT	Thomas F. DeVrince	Bonner and Borhart, LLP; Representing the Preserve and Benefit Historic Rondo Committee (PBHRC)	<p>I note that [the EAI provides essentially no additional analysis other than to rely on the Final Environmental Impact Statement ("FEIS") for the Central Corridor LRT project. I do not believe the EA is sufficient because it has all to the shortcomings of the FEIS. Accordingly, I hereby incorporate by reference both the Title VI complaint filed by PBHRC (see supporting correspondence dated May 20, 2009), as well as PBHRC's comments of July 27, 2009 on the EIS.</p>	<p>See responses to comments 2 B (transportation - targeted transit service plan), 2 C (affordable housing), and 13 B (environmental justice) above. All mitigation actions committed to in the FEIS will be implemented.</p>

**\*Subject Key:**

- AD - Real Estate Acquisitions and Displacements
- C - Construction
- CC - Community Cohesion
- E - Economic Development/Station Area Planning
- EJ - Environmental Justice
- F - Funding
- G - General
- H - Affordable Housing
- M - Miscellaneous
- MM - Mitigation Measures
- NV - Noise/Vibration
- P - Public Participation
- PT - Property Values and Taxes
- S - Support for Project
- SS - Safety and Security
- T - Transportation (transit service, parking)

No.	Subject*	Commenter	Group/ Affiliation	Comment	Response
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HP - Historic Resources and Parklands

V - Visual/Aesthetics

IC - Indirect and Cumulative impacts



**APPENDIX B – APPLICABLE MITIGATION COMMITMENTS  
FROM CCLRT RECORD OF DECISION**

# ***CENTRAL CORRIDOR INFILL STATIONS ENVIRONMENTAL ASSESSMENT Mitigation Monitoring Program***

The mitigation measures and other project features that reduce adverse impacts, to which FTA and the Metropolitan Council committed in the Final EIS and which are applicable to the Infill Stations EA, are summarized in the table below. The complete mitigation monitoring program for the CCLRT Project is found in the Record of Decision (ROD), a copy of which was included as an appendix of the Infill Stations EA.

### Summary Table of Impacts and Mitigation Measures

Impact/Mitigation Measure	Implementation and Monitoring	Responsible Party	Timing
<p><b>Long-Term (Operations) Impacts</b></p> <p><b>Land use:</b>                      The Central Corridor LRT (CCLRT) project is expected to have the following impacts:</p> <ul style="list-style-type: none"> <li>Existing development trends would continue.</li> <li>In downtown St. Paul, a new center of activity would be created surrounding the 4<sup>th</sup> and Cedar Streets station.</li> <li>In downtown St. Paul, the location of the operations and maintenance facility (OMF) may affect nearby residential and commercial development due to its reuse of the Diamond Products building, which will prevent a portion of this property from being redeveloped.</li> <li>The placement of traction power substations (TPSS) and signal bungalows is required along the corridor.</li> </ul> <p><b>Mitigation measures:</b></p> <ul style="list-style-type: none"> <li>Façade treatments and provisions for street front retail space at the OMF will help ensure that surrounding residential and commercial uses are enhanced.</li> </ul> <p>See Section 3.1 of the Final Environmental Impact Statement (FEIS) for details on impacts and mitigation measures.</p>	<ul style="list-style-type: none"> <li>In recognition of the stress new development may place on housing costs and opportunities for low income populations, the Metropolitan Council has partnered with Minnesota Housing and the Family Housing Fund to establish a new Land Acquisition for Affordable New Development (LAAND) Initiative. In November 2008, the Council authorized up to \$3.6 million in loans to help some metro-area cities buy land now for affordable housing in the future. Of the \$3.6 million, \$1.0 million will go to help with land acquisition for affordable housing near the CCLRT alignment along University Avenue.</li> <li>The access ramps to Washington Avenue from I-35W have been refined to limit impacts to development opportunities near the Cedar-Riverside community, and to enhance transit-oriented development potential.</li> <li>TPSS impacts will be reduced through restricting their sites to underutilized parcels such as surface parking lots. Five of the 13 TPSS are located at the OMF or near LRT stations and these TPSS will be seen as a part of the main transportation system.</li> </ul>	<p>Metropolitan Council</p>	<p>Final design</p>

Impact/Mitigation Measure	Implementation and Monitoring	Responsible Party	Timing
<p><b><u>Community facilities:</u></b> The following impacts have been identified:</p> <ul style="list-style-type: none"> <li>• Access impacts and on-street parking impacts including at community facilities.</li> </ul> <p><b><u>Mitigation measures:</u></b></p> <ul style="list-style-type: none"> <li>• The Metropolitan Council has mitigated access impacts to the fullest possible extent. For example:                             <ul style="list-style-type: none"> <li>• Metropolitan Council has been in consultation with Central Presbyterian Church to develop an agreement to provide daily access to the south church entrance, and special, but limited, access to the north church entrance.</li> <li>• At the U of M Transit/Pedestrian Mall, private vehicles will be diverted to adjacent roadways by information signs.</li> </ul> </li> </ul> <p>The Metropolitan Council will continue to work with the City of ST. Paul and affected property owners and tenants for parking measures as identified in the FEIS.</p>	<ul style="list-style-type: none"> <li>• Alternate routes, additional traffic signals, and modifications to traffic lanes will help minimize the impact of additional traffic on local streets near the Transit/Pedestrian Mall.</li> <li>• Emergency vehicles will have access to the Transit/Pedestrian Mall maintaining existing access to critical health facilities. Metropolitan Council will install directional signs directing automobile traffic to alternate routes.</li> <li>• All fire stations will have surmountable curbs installed by Metropolitan Council.</li> <li>• A surmountable curb will allow special event access for St. Louis King of France and Central Presbyterian churches from 10<sup>th</sup> Street.</li> </ul>	<p>Metropolitan Council</p>	<p>Final design</p>
<p>See Section 3.2 of the FEIS for detailed information about impacts and mitigation measures.</p> <p><b><u>Displacements and relocations:</u></b> Operation of the CCLRT requires a mix of permanent acquisition of portions of both public and private properties, utility easements, and property access closures.</p> <ul style="list-style-type: none"> <li>• Three privately owned properties would be taken in their entirety.</li> </ul>	<p>The Minnesota Department of Transportation (Mn/DOT), acting for the Metropolitan Council, will acquire all lands, easements, and other property rights required for the CCLRT. Although some lands will be acquired through fee purchase, other property will be acquired through temporary or permanent easements.</p>	<p>Metropolitan Council, MnDOT</p>	<p>Final design</p>

Impact/Mitigation Measure	Implementation and Monitoring	Responsible Party	Timing
<ul style="list-style-type: none"> <li>• Permanent private takings on 63 parcels would range in size from five square feet to 249,599 square feet (7.65 acres).</li> <li>• Permanent use (property within project construction limits) of existing public property would impact 42 parcels ranging from 500 square feet to 157,645 square feet (26.67 ac).</li> <li>• Three utility easements would be required on private property together with two easements on public property.</li> <li>• Twenty-four accesses, 15 private and 9 public, would be affected by project construction.</li> </ul> <p><b>Mitigation measures:</b></p> <ul style="list-style-type: none"> <li>• Where private property is to be acquired, the Metropolitan Council, with the assistance of MnDOT, will acquire that property in full compliance with the Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended (42 U.S.C. Sec. 4601 et seq.), and 49 CFR Part 24. FTA Circular 5010.1D dated November 1, 2008, as amended, will apply to CCLRT real estate acquisitions.</li> </ul> <p>See Section 3.3 of the FEIS.</p>			

Impact/Mitigation Measure	Implementation and Monitoring	Responsible Party	Timing
<p><b><u>Archaeological and Historic resources:</u></b>                      In consultation with the Minnesota State Historic Preservation Officer (MnSHPO) and other parties, an Area of Potential Effect was defined for the project and historic properties listed in or eligible for the National Register of Historic Places were identified. Since a determination on all effects on historic properties could not be made at the time the NEPA process would conclude, the FTA, the Advisory Council on Historic Preservation and MnSHPO developed and executed a Programmatic Agreement to assess effects on historic properties and to identify measures to avoid, minimize, or mitigate adverse effects.</p> <p><b><u>Mitigation measures:</u></b></p> <ul style="list-style-type: none"> <li>Metropolitan Council will comply with the stipulations contained in the CCLRT Programmatic Agreement.</li> </ul> <p>See Section 3.4 of the FEIS for detailed information about impacts. A copy of the Programmatic Agreement is included in Attachment A.</p>	<ul style="list-style-type: none"> <li>The CCLRT Programmatic Agreement commits to reporting to all consulting parties on a quarterly basis details on how measures stipulated in the Agreement are being implemented.</li> </ul>	Metropolitan Council	Final design
<p><b><u>Visual and Aesthetic conditions:</u></b>                      The project is expected to have the following impacts:</p> <ul style="list-style-type: none"> <li>Overhead Contact System (OCS), LRT tracks, TPSS, stations, and other system elements will add new visual elements to the streetscape.</li> <li>A new bridge will be constructed over I-35W to provide a connection of CCLRT to the existing Hiawatha LRT line.</li> <li>The OMF will reuse a portion of the existing Diamond Products Building.</li> </ul>	<ul style="list-style-type: none"> <li>The overall impact on the visual environment along University Avenue would be positive because the Preferred Alternative, described in the FEIS, will include a complete rebuilding of the street, curbs, and sidewalks.</li> <li>The Metropolitan Council hired artists and established station art committees to develop and install station art reflecting the culture and character of the adjacent community.</li> <li>The Preferred Alternative includes installing improved pedestrian crossings at signalized</li> </ul>	Metropolitan Council	Final design

Impact/Mitigation Measure	Implementation and Monitoring	Responsible Party	Timing
<p><b>Mitigation measures:</b></p> <p>Although the elements listed above would be designed and constructed to maintain visual consistency with existing transportation uses, specific design elements will be incorporated during final design to mitigate potential effects.</p> <ul style="list-style-type: none"> <li>• To the extent practicable, stations will be designed to ensure compatibility with its setting.</li> <li>• Where TPSS placement will alter visual quality, the Metropolitan Council will work with the respective neighborhoods and business districts to develop appropriate screening.</li> <li>• Measures for façade improvements on the southern and western edges of the Diamond Products building (the OMF site) will be taken, identifying and installing treatments that fit the character of the surrounding neighborhood.</li> <li>• Existing boulevard trees removed due to the construction of the CCLRT will be replaced consistent with local ordinances.</li> </ul> <p>See Section 3.6 of the FEIS for details about impacts and mitigation.</p>	<p>intersections, and installing non-signalized pedestrian crossings at many of the other street intersections.</p>		

Impact/Mitigation Measure	Implementation and Monitoring	Responsible Party	Timing
<p><b><u>Environmental justice:</u></b>                      The Central Corridor LRT FEIS included an analysis of environmental justice impacts of the project in compliance with Title VI of the Civil Rights Act of 1964 and the intent of Executive Orders 12898 and 13166, along with the USDOT Final Order on Environmental Justice and FTA Circular 49 CFR 21.5. This analysis identified the presence of minority and low-income populations and the effects of the project borne by these populations. Impacts of the CCLRT project which are not completely off-set by other benefits have been identified for three census blocks near Western Avenue. These three census blocks could experience a decrease in overall transit service.</p> <p><b><u>Mitigation measures:</u></b></p> <ul style="list-style-type: none"> <li>Metropolitan Council has committed to preparing a targeted transit service plan for the affected environmental justice community identified in the Title VI analysis of proposed service changes for the CCLRT. This plan will also provide for community input into the process and measures of need as expressed by and as tailored for this transit-dependent community.</li> <li>This plan will be completed at least six months prior to CCLRT beginning revenue service operations and will be implemented concurrent with the start of LRT service.</li> <li>The Metropolitan Council has committed to working toward resolution of community concerns that don't rise to the level of state or federal standards of adverse impacts.</li> </ul> <p>See Section 3.8 of the FEIS for details about impacts and mitigation.</p>	<ul style="list-style-type: none"> <li>Off-setting benefits of the Central Corridor LRT project have been identified for all but three census blocks near Western Avenue.</li> <li>Mitigation of impacts not offset by identified project benefits is committed to by the Metropolitan Council to address decreases in access to transit service experienced in isolated areas along the Central Corridor.</li> </ul>	<p>Metropolitan Council</p>	<p>Final design</p>



Impact/Mitigation Measure	Implementation and Monitoring	Responsible Party	Timing
<p><b><u>Contribution to Regional Air Quality Goals</u></b></p> <ul style="list-style-type: none"> <li>The project will have no adverse impacts on air quality as a result of CO emissions. See Section 4.5 of the FEIS for details.</li> </ul>	<p>No mitigation is required.</p>	<p>Metropolitan Council</p>	<p>Operation</p>
<p><b><u>Noise</u></b></p> <ul style="list-style-type: none"> <li>There are 16 "severe" Category 2 impacts within the CCLRT project corridor.</li> </ul> <p><b><u>Mitigation measures:</u></b></p> <ul style="list-style-type: none"> <li>Metropolitan Council commits to mitigation of severe noise impacts by moving special trackwork associated with identified impacts to less noise sensitive locations. In locations where this will not address all severe impacts, receiver-based mitigation has been identified. Finally, administrative measures to limit the sounding of high horns to emergency situations have been committed.</li> </ul> <p>See Section 4.6 of the FEIS for details about impacts and mitigation and the statement of required mitigation provided at page 1 of Attachment B.</p>	<p>The "severe" Category 2 impact remaining after mitigation is located at a City of St. Paul fire station in which firefighters sleep during their shift. Because it is used for sleeping, the fire station is categorized as a "residential" land use. Receiver-based mitigation (treatment of windows to increase sound resistance) has been committed to in the FEIS.</p> <p>An agreement with MPR committing to noise and vibration mitigation has been executed and is included in Appendix F1 of the FEIS. Also included in Appendix F1 are commitments made to Central Presbyterian church that address noise and vibration concerns.</p>	<p>Metropolitan Council</p>	<p>Final design, construction, operation</p>
<p><b><u>Vibration:</u></b></p> <ul style="list-style-type: none"> <li>Impacts have been identified to a total of 21 structures along the Central Corridor.</li> </ul> <p><b><u>Mitigation measures:</u></b></p> <ul style="list-style-type: none"> <li>Metropolitan Council commits to mitigation of vibration impacts due to crossovers by moving them to locations where they will not impact sensitive receptors.</li> <li>Metropolitan Council commits to mitigation of wheel-rail vibration with a floating slab at some</li> </ul>	<p>Where installation of treatments below the LRT trackway is being made to mitigate vibrations caused by wheel-rail interface, the Metropolitan Council will test such installations during pre-revenue service and after LRT begins revenue service operations to ensure that mitigations measures are working as specified.</p>	<p>Metropolitan Council</p>	<p>Final design, construction, operation</p>

Impact/Mitigation Measure	Implementation and Monitoring	Responsible Party	Timing
<p>impact locations, or high-resilience track fasteners at other impact locations.</p> <p>See Section 4.7 of the FEIS for details about impacts and mitigation and the statement of required mitigation provided at page 1 of Attachment B.</p> <p><b><u>Transportation:</u></b> The following impacts have been identified:</p> <p><b>TRANSIT</b></p> <ul style="list-style-type: none"> <li>Route 16 – all-day service frequency is modified to 20-minute peak period, 30-minute midday, evening, and weekend service.</li> </ul> <p><b><u>Mitigation measures:</u></b></p> <ul style="list-style-type: none"> <li>Metro Transit would follow standard procedures for route changes and deletions. Metro Transit would communicate service changes along the corridor as part of its community outreach program.</li> </ul> <p><b>PARKING</b></p> <ul style="list-style-type: none"> <li>Parking spaces will be removed in the State Capitol area, along University Avenue between 29th Avenue and Rice Street, and along Washington Avenue.</li> </ul> <p><b><u>Mitigation measures:</u></b></p> <ul style="list-style-type: none"> <li>The Metropolitan Council will work with the City of St. Paul on a Parking Solutions Team to identify parking mitigation strategies.</li> <li>The Metropolitan Council and the City of St. Paul will work with the affected property owners and tenants to maximize parking on and near University Avenue.</li> </ul>	<p>All CCLRT vehicles will be capable of accommodating travelers with bicycles.</p> <p>Reconstruction of the portion of the Hiawatha LRT Bicycle Trail requiring relocation due to CCLRT operations will be concurrent with construction of the Central Corridor LRT.</p>	<p>Metropolitan Council</p>	<p>Final design, construction, operation</p>

Impact/Mitigation Measure	Implementation and Monitoring	Responsible Party	Timing
<p><b>PEDESTRIANS AND BICYCLES</b></p> <ul style="list-style-type: none"> <li>No long-term adverse effects requiring mitigation have been identified.</li> <li>The operation of the Central Corridor LRT will require a portion of the currently HLR T bicycle trail to be relocated just north of its current configuration.</li> </ul>			
<b>Short-Term (Construction) Impacts</b>			
<p><b>Land use</b></p> <p>The following short-term/construction impacts have been identified:</p> <ul style="list-style-type: none"> <li>One skyway bridge in downtown St. Paul will be removed to allow for construction of the diagonal alignment between 4<sup>th</sup> and Cedar Streets and the 4<sup>th</sup> and Cedar Streets Station platform.</li> </ul> <p><b>Mitigation measures:</b></p> <ul style="list-style-type: none"> <li>The project includes funds for a temporary skyway bridge connection to be reconstructed to reconnect the downtown St. Paul skyway system between 4th and 5th Streets. This connection will be permanently restored with redevelopment of this site by the City of St. Paul.</li> </ul>	<ul style="list-style-type: none"> <li>Short-term impacts will be minimized by using standard construction best management practices (BMPs):</li> </ul>	Metropolitan Council	
<p><b>Neighborhoods and Community Facilities</b></p> <p>The following short-term/construction impacts have been identified:</p> <ul style="list-style-type: none"> <li>Inconvenience to patrons of businesses, clients of community facilities, patients of medical clinics and hospitals, and those attending schools and places of worship along the corridor.</li> <li>Where the grid pattern of streets is discontinuous,</li> </ul>	<p>BMPs would be implemented, including the following:</p> <ul style="list-style-type: none"> <li>Work with residents and business-owners to provide an alternate access to their neighborhoods and businesses</li> <li>Maintenance of access for fire stations, hospitals, emergency vehicles, day care, schools, etc.</li> <li>Maintenance of traffic and sequence of construction would be planned and scheduled to</li> </ul>	Metropolitan Council	

Impact/Mitigation Measure	Implementation and Monitoring	Responsible Party	Timing
<p>residents and patrons may experience some delays in gaining access to homes and businesses near construction.</p> <p><b>Mitigation measures:</b></p> <ul style="list-style-type: none"> <li>Residents and patrons, as well as medical and emergency service responders, will be directed to alternate routes to gain access to homes and businesses.</li> </ul>	<ul style="list-style-type: none"> <li>minimize traffic delays and inconvenience.</li> <li>Access to all neighborhoods would be maintained throughout the construction period.</li> </ul>		
<p><b>Acquisitions and Displacements/Relocations</b></p> <p>The following short-term/construction impacts have been identified:</p> <ul style="list-style-type: none"> <li>Temporary construction easements would be required on 173 parcels for installation of project features.</li> <li>Three privately owned parcels would be affected by utility easements.</li> <li>Temporary easements are needed on 10 parcels of public property and two easements for utility work.</li> </ul> <p><b>Mitigation measures:</b></p> <ul style="list-style-type: none"> <li>Impacts related to temporary changes to parking and access will be mitigated by developing a Construction Outreach Coordination Plan during final design. The plan will detail planned activities during construction, partnerships, and specific programs to assist local businesses and residents affected by construction and methods to minimize impacts during construction of the project.</li> </ul> <p><b>Cultural Resources</b></p> <p>The following short-term/construction impacts have been identified:</p>	<p>BMPs would be implemented:</p> <ul style="list-style-type: none"> <li>Work with residents and business-owners to provide an alternate access to their neighborhoods and businesses</li> <li>Maintenance of access for fire stations, hospitals, emergency vehicles, day care, schools, etc.</li> <li>Maintenance of traffic and sequence of construction would be planned and scheduled to minimize traffic delays and inconvenience.</li> <li>Access to all neighborhoods would be maintained throughout the construction period.</li> </ul>	Metropolitan Council	
<p>The following short-term/construction impacts have been identified:</p>	<p>Mitigation for construction related impacts would be implemented as for all other portions of the project. Additional or specific mitigation measures for</p>	Metropolitan Council	

Impact/Mitigation Measure	Implementation and Monitoring	Responsible Party	Timing
<ul style="list-style-type: none"> <li>Temporary vibration, noise, traffic, and visual impacts will affect all NRL and NRE properties, except Minnesota Historical Society (NRL), including parts of Prospect Park Residential HD, University of Minnesota Campus Mall HD, Washington Avenue Bridge, East River Parkway, and Pioneer Hall (all NRE).</li> </ul> <p><b>Mitigation measures:</b></p> <ul style="list-style-type: none"> <li>Metropolitan Council will comply with the stipulations contained in the Central Corridor LRT Programmatic Agreement.</li> </ul> <p>See Section 3.4 of the FEIS and the PA, which is included in Attachment A to this ROD.</p>	<p>construction impacts will be implemented through consultation as specified in the PA (see Attachment A).</p>		
<p><b>Visual/Aesthetic Conditions</b></p> <p>The following short-term/construction impacts have been identified:</p> <ul style="list-style-type: none"> <li>Construction staging areas will be viewable from sensitive uses such as residences and recreational areas.</li> <li>Construction activities would be noticeable to area residents and others traveling through the corridor.</li> <li>Existing trees and vegetation could be injured during construction activity.</li> </ul> <p><b>Mitigation measures:</b></p> <ul style="list-style-type: none"> <li>Metropolitan Council would ensure that construction crews working at night direct any artificial lighting onto the work site to minimize "spill over" light or glare in adjacent residential areas.</li> </ul>	<p>Mitigation for construction-related impacts would be implemented as for all other portions of the project.</p>	<p>Metropolitan Council</p>	

Impact/Mitigation Measure	Implementation and Monitoring	Responsible Party	Timing
<ul style="list-style-type: none"> <li>The Metropolitan Council will develop a plan for protecting existing trees and vegetation.</li> <li>The Metropolitan Council will assess the need for additional landscaping to mitigate potential visual intrusion or privacy vegetation-clearing.</li> </ul>			
<p><b>Water Resources</b></p> <ul style="list-style-type: none"> <li>Construction activities will expose soils and may result in the generation of sediment laden stormwater within the construction area.</li> </ul>			
<p><b>Mitigation measures:</b> Construction BMPs will be used to protect other water resources.</p> <ul style="list-style-type: none"> <li>Inlet protection of catch basins – filters, bio-bags, and catch basin drop filters</li> <li>Excavation silt control – silt fence and bio-bags as appropriate</li> <li>Temporary seeding of open excavations and stockpiles – as appropriate for surface soil areas that remain exposed for several weeks or longer</li> <li>Swales with check dams – surface waterways with periodic check dams for silt removal</li> <li>Temporary paving of area to receive traffic prior to final restoration</li> <li>Infiltration of storm water runoff after removal of heavy sediments</li> <li>Temporary re-routing of storm water away from exposed slopes and stockpiles</li> <li>Vehicle tracking pads to reduce the amount of mud transported offsite</li> </ul>	<ul style="list-style-type: none"> <li>The project will require coordination and permitting from local, state and federal water resource agencies. The proposed project will comply with applicable federal, state, and local regulations and will install BMPs to control and minimize erosion and potential impacts to surface water resources.</li> <li>The project will be monitored under grading permits issued by the Capitol Region Watershed District (CRWD) as well as the cities of St. Paul and Minneapolis.</li> </ul>	Metropolitan Council	

Impact/Mitigation Measure	Implementation and Monitoring	Responsible Party	Timing
<p><b>Air Quality</b></p> <p>Short-term emissions due to construction operations will include emissions from vehicles due to traffic detours, operations of construction vehicles, and fugitive dust generated within the construction site.</p> <p><b>Mitigation measures:</b></p> <p>Emissions due to construction operations for the Preferred Alternative would be mitigated by implementation of BMPs including the following:</p> <ul style="list-style-type: none"> <li>• The contractor would be required to follow Minnesota air quality regulations</li> <li>• A construction traffic control plan would be developed to minimize vehicle emissions due to traffic issues caused by construction activities</li> <li>• Construction, operation, and maintenance vehicles would be maintained to make sure that engines remain tuned and emission-control equipment is functioning properly</li> <li>• No unnecessary idling of vehicles or construction equipment will be allowed.</li> <li>• Fugitive dust will be minimized or avoided by using BMPs</li> </ul>	<p>Air quality issues related to construction activities are subject to Minnesota Pollution Control Agency (MPCA) standards. Best management practices will be implemented to ensure compliance with MPCA standards.</p>		
<p><b>Noise</b></p> <p>The following short-term/construction impacts have been identified:</p> <ul style="list-style-type: none"> <li>• Construction noise impacts from multiple types of machinery (diesel) during the daytime and nighttime</li> </ul>	<p>The noise ordinances of both the cities of Minneapolis and St. Paul are applicable to this project; however both defer to the MPCA noise standards for maximum allowable noise levels.</p>	<p>Metropolitan Council</p>	

Impact/Mitigation Measure	Implementation and Monitoring	Responsible Party	Timing
<ul style="list-style-type: none"> <li>• Potential for some impact pile driving and pavement breaking</li> </ul> <p><b><u>Mitigation measures:</u></b></p> <ul style="list-style-type: none"> <li>• Most construction activities will take place during daytime hours; however, it is possible that some work will have to be performed at nighttime and the Metropolitan Council will require its contractors to use BMPs to minimize intrusive levels of construction noise.</li> <li>• Use well-maintained construction equipment, and effective and well-maintained mufflers or silencers on loud equipment.</li> <li>• Loud construction activities will be prohibited during nighttime in areas near the U of M dormitories, near student housing apartments near the U of M campus, and near residences along University Avenue and on East 4th Street in downtown St. Paul.</li> <li>• Construction noise has potential to interfere with use of Studio M, Studio P, and the Forum at MPR. The scheduling of the construction activities with the potential to interfere with these uses will be coordinated with MPR so as to minimize potential disruptions.</li> <li>• Use of loud construction equipment in the immediate vicinity of St. Louis King of France and Central Presbyterian churches will be coordinated with the churches to ensure minimal disruption of activities inside the churches.</li> <li>• Construction contractors will be required to develop a noise mitigation plan.</li> </ul>	<p>Metropolitan Council commits to coordinating with affected project stakeholders to minimize intrusive construction noise.</p>		



Impact/Mitigation Measure	Implementation and Monitoring	Responsible Party	Timing
<ul style="list-style-type: none"> <li>See also the statement of required mitigation provided at page 1 of Attachment B.</li> </ul> <p><b>Vibration</b> The following short-term/construction impacts have been identified:</p> <ul style="list-style-type: none"> <li>Construction activities with the potential for generating high levels of vibration have been identified and include pile driving, demolition using jackhammers and hoe rams, and operation of heavy tracked equipment such as bulldozers and backhoes.</li> <li>Use of high-vibration construction equipment at distances of less than approximately 0.5 mile from research labs may interfere with use of vibration sensitive equipment.</li> <li>Use of high-vibration construction equipment at distances of less than approximately 1,000 feet from recording studios may interfere with use of the studios.</li> </ul> <p><b>Mitigation measures:</b></p> <ul style="list-style-type: none"> <li>Whenever construction will be performed near U of M research facilities, the MPR studios, or the Fitzgerald Theater, coordination with these entities will take place to minimize potential disruption to building and/or equipment usage.</li> <li>Vibration monitoring is a crucial requirement when construction will be within 150 ft of fragile historic buildings. If vibration from the test approaches or exceeds the limits, the force of the pile driver will be reduced until the vibration amplitudes at all sensitive buildings are below the applicable limit.</li> </ul>	<p>The following measures are recommended to mitigate vibration impacts (see more detail in Section 4.7 of the FEIS).</p> <ul style="list-style-type: none"> <li>A standard pre-construction survey will be performed to document the existing condition of all structures in the vicinity of sites where major construction will be performed.</li> <li>Three sets of vibration limits are recommended for various building types and usages.</li> <li>The contractor will be required to monitor vibration to verify that no construction activities exceed the vibration limits to minimize the potential for damage to structures.</li> <li>Stakeholders will be consulted and notified of the schedule in advance of high vibration construction activities.</li> <li>Where feasible and cost effective, low vibration construction procedures will be required.</li> <li>A Vibration and Noise Management and Remediation Plan (VNMRP) will be developed to address issues related to construction noise and vibration affecting historic properties.</li> </ul>	<p>Metropolitan Council</p>	

Impact/Mitigation Measure	Implementation and Monitoring	Responsible Party	Timing
<ul style="list-style-type: none"> <li>See also the statement of required mitigation provided at page 1 of Attachment B.</li> </ul> <p><b>Transportation</b> The following impacts have been identified: <b>TRANSIT</b></p> <ul style="list-style-type: none"> <li>Some disruption of Route 16 and Route 50 service on University Avenue would occur during construction.</li> </ul> <p><b>Mitigation measures:</b></p> <ul style="list-style-type: none"> <li>Information would be posted at bus-stops. Detour information would also be placed on Metro Transit's web site and updated daily.</li> <li>Metro Transit would follow standard procedures for route changes and deletions.</li> <li>Metro Transit would communicate service changes along the corridor as part of its community outreach program described in Chapter 11 of the FEIS.</li> </ul> <p><b>PEDESTRIANS AND BICYCLES</b></p> <ul style="list-style-type: none"> <li>There will be temporary closures or detours for bike and pedestrian facilities, including a relocation of the Hiawatha LRT trail between 15<sup>th</sup> and 11<sup>th</sup> avenues in Minneapolis.</li> </ul> <p><b>Mitigation measures:</b></p> <ul style="list-style-type: none"> <li>A detour route for the HLRT bicycle trail will be identified and signed during construction.</li> <li>Notifications would be managed according to the traffic management plan developed during final design.</li> </ul>	<ul style="list-style-type: none"> <li>Project outreach coordinators began surveying business and property owners in the spring of 2008 for details on their points of access to help engineers design the line and plan construction. Additional sequencing, along with close coordination with all of the project stakeholders, community groups, and local businesses, will be implemented to effectively deal with and minimize the impacts that may occur.</li> <li>City/county permits will be acquired by project contractors from the appropriate city offices for roadway disruptions and blockages.</li> <li>Maintenance of traffic details will be finalized during final design and may be modified by the contractor with permission from the CCPO and project partners.</li> <li>For construction, specific mitigation will be developed during final design to determine maximum number of lanes closed during peak traffic hours, maintenance and removal of traffic control devices, efficient traffic rerouting measures, and scheduling of construction activities within the roadways for times other than peak traffic periods.</li> <li>The Metropolitan Council and the City of St. Paul will work with the affected property owners and tenants to maximize parking on and near University Avenue during construction periods.</li> </ul>	<p>Metropolitan Council</p>	

Impact/Mitigation Measure	Implementation and Monitoring	Responsible Party	Timing
<ul style="list-style-type: none"> <li>Bicyclists would be notified through signage and public notice that bike lanes are detoured.</li> <li>Where construction activities affect sidewalk areas, special facilities, such as temporary handrails, fences, ramps, barriers, walkways and bridges may be provided for the safety of pedestrians.</li> <li>If crosswalks are temporarily closed, pedestrians will be directed to use alternative crossings.</li> <li>All sidewalk and crosswalk surfaces will meet minimum standards for accessibility and be free of slipping and tripping hazards.</li> </ul> <p><b>PARKING</b></p> <ul style="list-style-type: none"> <li>Some on-street parking facilities will be temporarily unavailable to allow for construction equipment and vehicles to park or be located near construction sites.</li> </ul> <p><b>Mitigation measures:</b></p> <ul style="list-style-type: none"> <li>The Metropolitan Council is working collaboratively with the City of St. Paul on a Parking Solutions Team to identify parking mitigation strategies that will address impacts and mitigation of impacts during construction.</li> </ul>			