

6

Environmental Justice

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Acronyms/Abbreviations

ACS	American Community Survey
BNMC	Buffalo Niagara Medical Campus
CEQ	Council on Environmental Quality
DEIS	Draft Environmental Impact Statement
EO	Executive Order
FTA	Federal Transit Administration
LRT	light-rail transit
NEPA	National Environmental Policy Act
NFTA	Niagara Frontier Transportation Authority
NYSDEC	New York State Department of Environmental Conservation
SEQRA	State Environmental Quality Review Act
UB	University at Buffalo
U.S. DOT	United States Department of Transportation

6 Environmental Justice

This chapter considers whether minority populations and/or low-income populations (referred to herein as environmental justice populations) would experience potential adverse environmental or health impacts from the Proposed Action and whether such impacts would fall disproportionately on those populations. Federal agencies are required to identify disproportionately high and adverse effects of their actions on environmental justice populations. Where such effects are identified, federal agencies are to identify mitigation for those effects and conduct outreach to the affected populations to seek their input on the impacts and mitigation. A similar analysis is required pursuant to New York State Department of Environmental Conservation policy guidelines where a proposed action requires a permit from that state agency.

As described in Chapter 1, “Project Description”, the Proposed Action will be the subject of a future application by the Niagara Frontier Transit Metro System, Inc. (Metro), a wholly-owned subsidiary of the Niagara Frontier Transportation Authority (NFTA) for federal funds administered through the Federal Transit Administration (FTA) or other federal sources to cover a portion of the Proposed Action’s capital costs. Therefore, this DEIS is intended to be compliant with the substantive environmental review requirements of the National Environmental Policy Act of 1969 (NEPA) (42 U.S. Code § 4321 et seq.) and implementing regulations of the Council on Environmental Quality 40 CFR Parts 1500–1508), the Federal Highway Administration/Federal Transportation Authority (23 CFR Part 771), and applicable federal rules, regulations, and executive orders, in addition to the New York State Environmental Quality Review Act (SEQRA). This chapter is intended to satisfy applicable environmental justice analysis requirements arising under federal and state guidelines.

6.1 REGULATORY CONTEXT

6.1.1 Federal

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (EO 12898), directs federal agencies to take the appropriate and necessary steps to identify and address disproportionately high and adverse environmental effects of federal agency actions (including transportation projects) on the health or environment of minority populations and low-income populations to the maximum extent practicable and permitted by law. The documents that establish policies and procedures for transportation agencies to use in complying with EO 12898 include the following:

- *Environmental Justice Guidance under the National Environmental Policy Act* (Council on Environmental Quality (CEQ), 1997) (referred to as CEQ guidance) established guidance on integrating environmental justice objectives in project development. The CEQ oversees the federal government’s compliance with EO 12898 and NEPA; federal agencies may supplement this guidance with more specific procedures tailored to their particular program or activities.

- *Updated Environmental Justice Order 5610.2(a): Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*¹ (U.S. Department of Transportation (U.S. DOT), May 2012) (referred to as the U.S. DOT Order) provides detailed procedures for identifying environmental justice populations, determining disproportionately high and adverse effects to the targeted populations, and stipulating specific measures to address instances of disproportionately high and adverse effects.
- *FTA Circular 4703.1, Environmental Justice Policy Guidance for Federal Transit Administration Recipients* (August 2012) (referred to as the FTA Circular) provides guidance for incorporating environmental justice principles into the environmental review process that is consistent with the CEQ guidance and U.S. DOT Order and addresses the following three guiding principles of environmental justice:
 - Avoid, minimize, or mitigate disproportionately high and adverse human health and environmental, social, and economic effects on minority and low-income populations.
 - Ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.
 - Prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations.

The principles of environmental justice reflected in the orders and guidance document are directly related to Title VI of the Civil Rights Act of 1964, which prohibits discrimination on the basis of race, color, and national origin. In accordance with this act, a program, policy, or activity that will result in a disparate impact to one of these protected classes may be carried out only if (1) the funding recipient can demonstrate a substantial legitimate justification for the program, policy, or activity; and (2) there are no comparably effective alternative practices that would result in less disparate impacts.

6.1.2 State

The New York State Department of Environmental Conservation (NYSDEC) Commissioner Policy 29, Environmental Justice and Permitting (March 2003) (referred to as CP-29) provides guidance for incorporating environmental justice concerns into NYSDEC environmental permit review. For projects undergoing review under SEQRA, CP-29 calls for the following:

- Identify the potential environmental impacts of the proposed project.
- Use census data to determine if areas that may be affected by the project are environmental justice areas.
- Evaluate the additional burden of any adverse environmental impact on the potential environmental justice area.
- Where a project has the potential for adverse impact to environmental justice areas, develop and implement an enhanced public participation plan to keep the public informed about the project. Present information in an easy-to-read, understandable format, using plain language and, when

¹ This order updates U.S. DOT's original Environmental Justice Order, which was published April 15, 1997.

appropriate, translate public notice materials into languages other than English for comprehension by non-English speaking stakeholders.

6.2 METHODOLOGY

This environmental justice analysis is consistent with the guidance and methodologies set forth in the CEQ guidance, U.S. DOT Order, FTA Circular, and CP-29 and involved six basic steps:

1. Identify the area where the Proposed Action could cause impacts, i.e., the study area (Section 6.1.3).
2. Identify environmental justice areas in the study area using census data regarding race, ethnicity, and poverty status for the census block groups in the study area, supplemented by other sources, to identify minority and low-income populations (Section 6.2).
3. Identify the Proposed Action’s potential adverse effects and benefits (Section 6.4.1).
4. Evaluate the Proposed Action’s potential adverse effects and benefits on minority and low-income populations relative to its effects on non-minority and non-low-income populations to determine whether the Proposed Action would result in disproportionately high and adverse effects on minority or low-income populations (Section 6.4.2).
5. If disproportionately high and adverse effects on minority or low-income populations would result, determine the following (Section 6.5):
 - Are there practicable mitigation measures or alternatives that would avoid or reduce the disproportionately high and adverse effects?
 - Does a substantial need for the action exist, and would other reasonable alternatives either have other adverse impacts that are more severe or involve increased costs of extraordinary magnitude?
6. Where minority and low-income populations are present in the study area, conduct outreach targeted to those populations (Section 6.6).

6.2.1 Study Area and Data Sources

The study area for the environmental justice analysis encompasses the area most likely to experience impacts during construction and operation of the Proposed Action. The study area for the environmental justice analysis includes the area that is: 1) within a one-half-mile radius of a proposed station; and 2) within a one-quarter-mile radius on either side of the Proposed Action alignment outside of proposed station areas (the same study area is used for most of the other evaluations in this Draft Environmental Impact Statement [DEIS]). Census block groups that fall either wholly or partly within these distances are included in the study area. As shown in Table 6-1, 14 census tracts with a total of 33 census block groups are in the study area.

Table 6-1. Block Groups in the Study Area

Municipality	Census Tract	Block Groups
City of Buffalo	46.01	3, 4
	46.02	1
Town of Tonawanda	79.02	2
	79.04	1, 2, 3
	80.01	2, 3, 4, 5
	80.03	1, 2, 3, 5
Town of Amherst	91.06	2
	91.09	1, 2
	91.10	1
	91.12	1
	91.15	1, 2
	92	1, 2, 3, 4
	93.01	1, 2, 3, 4, 5
	93.02	2, 3

Source: U.S. Census Bureau.

Data from the U.S. Census Bureau’s 2013–2017 American Community Survey (ACS) five-year estimates were used to identify minority and low-income populations at the block group level. In addition to the census, other data sources were used to confirm the location of minority and low-income populations, including field visits, community meetings and interviews, and a desktop review of revitalization and planning efforts within the study area.

6.2.2 Identifying Minority Population

As defined in the guidance, *minority* includes persons who are American Indian and Alaska Native, Asian, Black or African American, Hispanic or Latino, and Native Hawaiian and other Pacific Islander. In addition, this environmental justice analysis also considers minority population to include persons identified as being either “some other race” or “two or more races” in the census data.

The guidance documents, including the FTA Circular, define *minority population* as a readily identifiable group or groups of minority persons who live in geographic proximity, and if circumstances warrant, geographically dispersed or transient persons who would be similarly affected by a proposed project. CEQ guidance identifies minority populations if (1) the minority population of the affected area exceeds 50 percent; or (2) the minority population percentage of the affected area is meaningfully greater than the minority population percentage in the general population or other appropriate unit of geographic analysis. For this analysis, the percentage of Erie County’s minority population (24 percent) was used as the primary statistical reference area to identify minority populations within the study area.

6.2.3 Identifying Low-Income Population

As defined in the guidance, *low income* means a person whose median household income is at or below the U.S. Department of Health and Human Services poverty guidelines. *Low-income population* means a readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed/transient persons who will be similarly affected by a proposed project. The FTA Circular notes that grantees are encouraged to use a locally developed threshold or a percentage of median income for the area, provided that the threshold is at least as inclusive as the U.S. Department of Health and Human Services guidelines. For this analysis, U.S. Census Bureau poverty data was used, which provides the basis for the U.S. Department of Health and Human Services poverty guidelines.² Using Erie County as the statistical reference area, block groups with a percentage of individuals living below the poverty level of greater than 15 percent are considered low-income communities.

6.3 EXISTING CONDITIONS

This analysis identifies census block groups in the study area where a higher proportion of minority and/or low-income people are present than in the larger area. These areas are environmental justice areas. The larger area used for comparison, called the statistical reference area, is Erie County. In addition, information on the overall study area, the municipality in which the block group is located (Buffalo, Tonawanda, or Amherst), and New York state, is also presented. Table 6-2 presents minority and income data for these larger geographic areas.

Table 6-2. Reference Area Race and Economic Characteristics

Area	Total Population	Race and Ethnicity						Economic Profile	
		White	Black	Asian	Other	Hispanic	Total Minority	Median Household Income	Below Poverty Level
Study Area	43,680	69.2%	8.8%	14.6%	2.5%	5.0%	30.8%	\$48,983	18.7%
City of Buffalo	259,574	44.0%	36.3%	5.2%	3.2%	11.3%	56.0%	\$34,268	30.9%
Town of Tonawanda	73,044	88.3%	4.1%	2.0%	2.0%	3.7%	11.7%	\$55,936	8.6%
Town of Amherst	125,024	78.7%	6.2%	8.9%	2.5%	3.7%	21.3%	\$72,459	10.8%
Erie County	923,995	75.9%	13.0%	3.4%	2.4%	5.2%	24.1%	\$54,006	14.9%
New York State	19,798,228	55.9%	14.4%	8.3%	2.6%	18.8%	44.1%	\$62,756	15.1%

Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates; Tables B03002, B17021, and B19013.

Note: The racial and ethnic categories are as follows: White: White alone - not Hispanic or Latino; Black: Black or African American alone - not Hispanic or Latino; Asian: Asian alone - not Hispanic or Latino; Other: American Indian, Alaska Native, Native Hawaiian, Other Pacific Islander, some other race, two or more races - not Hispanic or Latino; Hispanic: Hispanic or Latino - persons of Hispanic origin may be of any race.

As shown in Table 6-2, Buffalo has a large minority population (about 56 percent) compared to both Erie County and New York state (about 24 percent and 44 percent, respectively). By contrast, the suburbs to the north of Buffalo have fewer minorities (approximately 12 percent for Tonawanda and 21 percent for Amherst). The percentage of minority populations in the study area block groups overall is approximately 31 percent.

² The U.S. Census Bureau provides updated poverty thresholds annually, which vary by the number and age of adults and the number of children under age 18 in the family unit.

In terms of poverty status, Buffalo has a relatively large number of people living below the poverty level (about 31 percent) compared to Erie County and New York state (both at around 15 percent). By contrast, the suburbs to the north of the city have lower poverty rates (about 9 percent for Tonawanda and 11 percent for Amherst). The study area block groups (as a whole) have about 19 percent of the population living below the poverty level.

Table 6-3 presents population characteristics for each of the block groups in the study area, based on 2013-2017 ACS data. Shading and bold font in the table indicate an environmental justice community. As shown there, the study area had a total population of 43,680 in 2017. Overall, about 30.8 percent of residents were minority, which is a higher percentage than that of Erie County (approximately 24 percent) but lower than New York State (approximately 44 percent). An estimated 14.6 percent of the population identified themselves as Asian, comprising the largest minority race/ethnicity cohort. Of the 33 individual block groups in the study area, 17 block groups had more than 24 percent minority residents and therefore are considered environmental justice populations. The three block groups in Buffalo, two of the 12 block groups in Tonawanda, and 12 of the 18 block groups in Amherst are considered environmental justice populations because of their minority population. Figure 6-1 shows these block groups.

Approximately 18 percent of the study area population lived below the poverty level. Of the 33 block groups, 12 had more than 15 percent of the population living in poverty and therefore are considered to be low-income communities for this environmental justice analysis. Two of the three block groups in Buffalo, two of the 12 block groups in Tonawanda, and eight of the 18 block groups in Amherst had a greater population of population living in poverty than the statistical reference area of Erie County. Figure 6-2 shows these block groups.

Figure 6-3 shows the locations of the 17 block groups identified as environmental justice communities, where the percentages of minority population and/or those living below the poverty level are greater than in Erie County. Most of these block groups are located north and east of the Niagara Falls Boulevard but generally south of Ellicott Creek and North Forest Road in Amherst. Most block groups west of Niagara Falls Boulevard and those north of Ellicott Creek/North Forest Road are not environmental justice communities based on the established thresholds. Additional data sources in these areas did not reveal small or localized environmental justice populations.

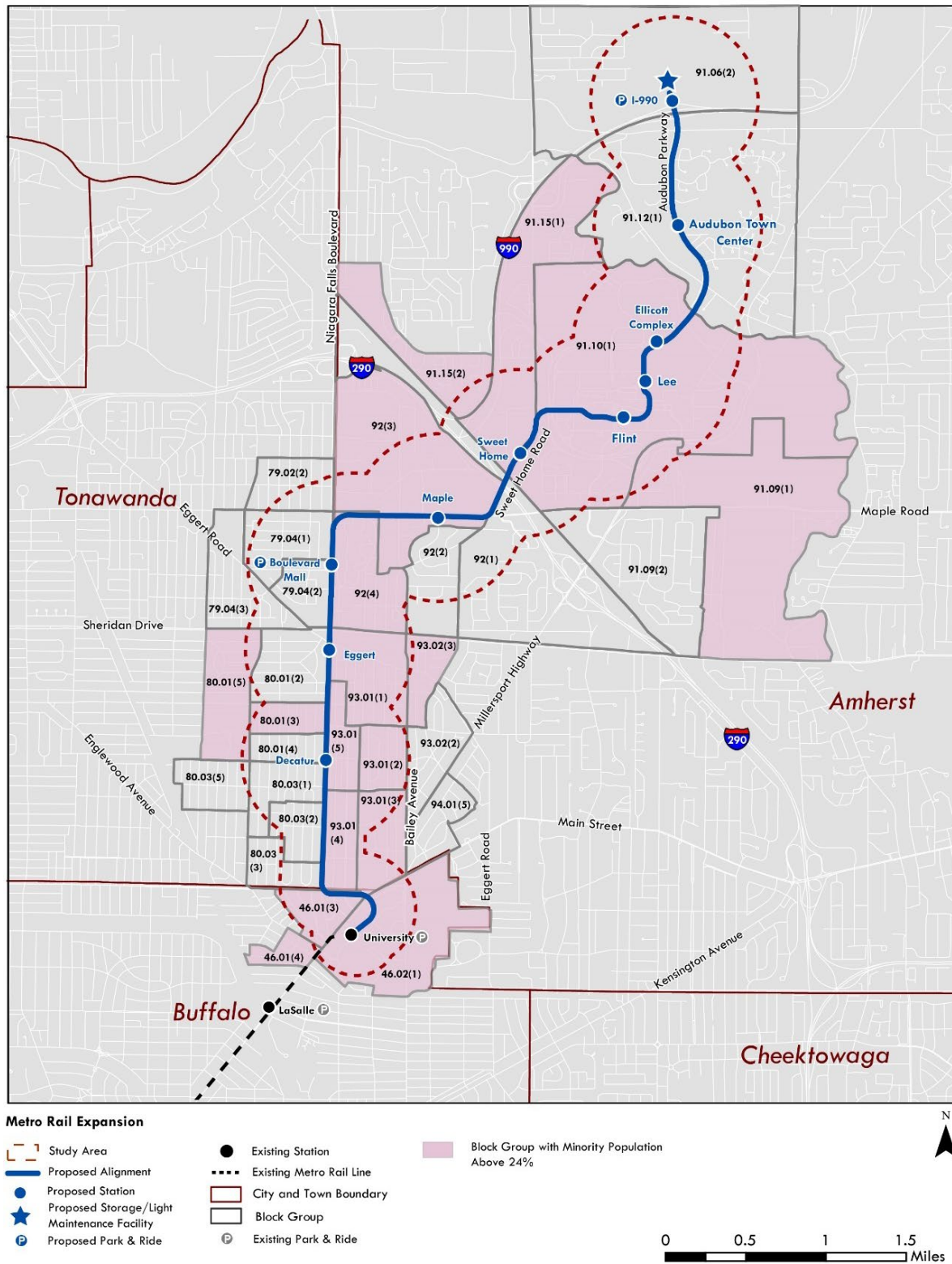
Table 6-3. Environmental Justice Study Area – Race, Ethnicity, and Poverty

Census Tract	Block Group	Total Population	Race and Ethnicity					Total Minority	Below Poverty
			White	Black	Asian	Other	Hispanic		
CITY OF BUFFALO									
46.01	3	1,140	71.6%	5.9%	16.8%	2.2%	3.6%	28.4%	29.0%
46.01	4	719	38.9%	26.8%	31.4%	1.0%	1.8%	61.1%	52.6%
46.02	1	1,111	36.9%	17.7%	28.4%	1.5%	15.5%	63.1%	11.8%
Buffalo Total		259,574	44.0%	36.3%	5.2%	3.2%	11.3%	56.0%	30.9%
TOWN OF TONAWANDA									
79.02	2	543	94.3%	3.0%	0.0%	0.0%	2.8%	5.7%	0.0%
79.04	1	1,410	96.7%	0.9%	0.9%	0.1%	1.4%	3.3%	1.8%
79.04	2	548	100.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
79.04	3	1,420	89.6%	0.6%	6.3%	0.4%	3.1%	10.4%	6.8%
80.01	2	1,299	80.2%	0.8%	16.2%	0.0%	2.9%	19.8%	4.8%
80.01	3	914	66.7%	24.5%	0.0%	2.5%	6.2%	33.3%	15.7%
80.01	4	489	88.3%	0.0%	0.0%	0.0%	11.7%	11.7%	0.0%
80.01	5	1,135	61.5%	20.1%	0.0%	0.0%	18.4%	38.5%	18.2%
80.03	1	961	93.3%	1.5%	0.0%	5.2%	0.0%	6.7%	11.9%
80.03	2	796	91.1%	0.0%	0.0%	2.3%	6.7%	8.9%	8.6%
80.03	3	860	88.1%	0.0%	4.1%	0.0%	7.8%	11.9%	0.0%
80.03	5	1,015	88.3%	3.1%	0.7%	2.2%	5.8%	11.7%	5.1%
Tonawanda Total		73,044	88.3%	4.1%	2.0%	2.0%	3.7%	11.7%	8.6%
TOWN OF AMHERST									
91.06	2	2,114	91.3%	1.6%	3.6%	0.4%	3.2%	8.7%	10.7%
91.09	1	1,339	63.6%	7.1%	22.7%	1.3%	5.2%	36.4%	12.1%
91.09	2	1,869	89.1%	1.5%	8.2%	0.8%	0.4%	10.9%	4.5%
91.10	1	5,843	53.0%	11.1%	22.2%	2.9%	10.8%	47.1%	70.6%
91.12	1	3,028	85.5%	2.3%	5.7%	2.2%	4.4%	14.5%	13.4%
91.15	1	2,708	42.3%	13.1%	37.6%	4.0%	2.9%	57.7%	55.8%
91.15	2	1,366	45.6%	2.9%	45.1%	5.8%	0.7%	54.4%	43.5%
92	1	1,390	97.1%	0.0%	2.9%	0.0%	0.0%	2.3%	4.0%
92	2	698	94.6%	5.4%	0.0%	0.0%	0.0%	5.4%	7.0%
92	3	1,022	48.0%	18.4%	21.5%	8.7%	3.3%	52.0%	39.2%
92	4	870	35.1%	8.9%	48.9%	1.4%	5.9%	64.9%	38.9%
93.01	1	1,015	68.3%	4.4%	19.4%	5.7%	2.2%	31.7%	11.3%
93.01	2	829	58.8%	25.4%	14.0%	1.8%	0.0%	41.3%	10.7%
93.01	3	1,409	35.8%	14.4%	45.0%	4.1%	0.9%	64.2%	46.3%
93.01	4	949	69.6%	12.3%	1.0%	3.2%	14.0%	30.5%	2.0%
93.01	5	1,207	51.5%	40.0%	1.0%	2.0%	5.5%	48.5%	42.6%
93.02	2	1,146	81.1%	8.4%	0.0%	10.6%	0.0%	18.9%	5.0%
93.02	3	518	67.0%	19.1%	3.7%	9.5%	0.8%	33.0%	31.3%
Amherst Total		125,024	78.7%	6.2%	8.9%	2.5%	3.7%	21.3%	10.8%
STUDY AREA TOTAL		43,680	69.2%	8.8%	14.6%	2.5%	5.0%	30.8%	18.7%
ERIE COUNTY		923,995	75.9%	13.0%	3.4%	2.4%	5.2%	24.1%	14.9%
NEW YORK STATE		19,798,228	55.9%	14.4%	8.3%	2.6%	18.8%	44.1%	15.1%

Source: U.S. Census Bureau, 2013-2017 American Community Survey 5-Year Estimates; Tables B03002 and B17021.

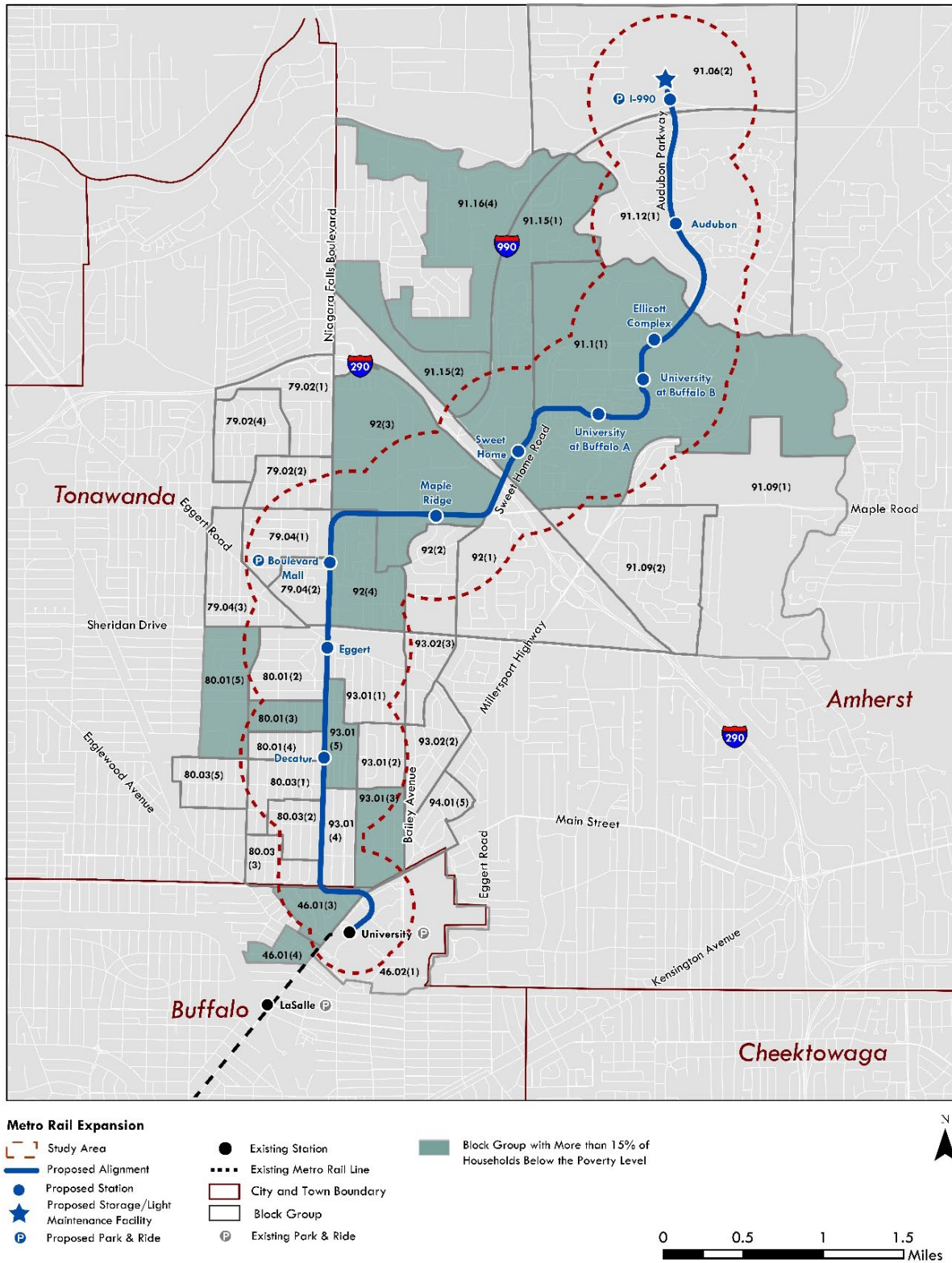
 Notes: **Shading and bold font** indicate an environmental justice community. The racial and ethnic categories are as follows: White: White alone - not Hispanic or Latino; Black: Black or African American alone - not Hispanic or Latino; Asian: Asian alone - not Hispanic or Latino; Other: American Indian, Alaska Native, Native Hawaiian, Other Pacific Islander, some other race, two or more races - not Hispanic or Latino; Hispanic: Hispanic or Latino - persons of Hispanic origin may be of any race.

Figure 6-1. Minority Population within the Study Area



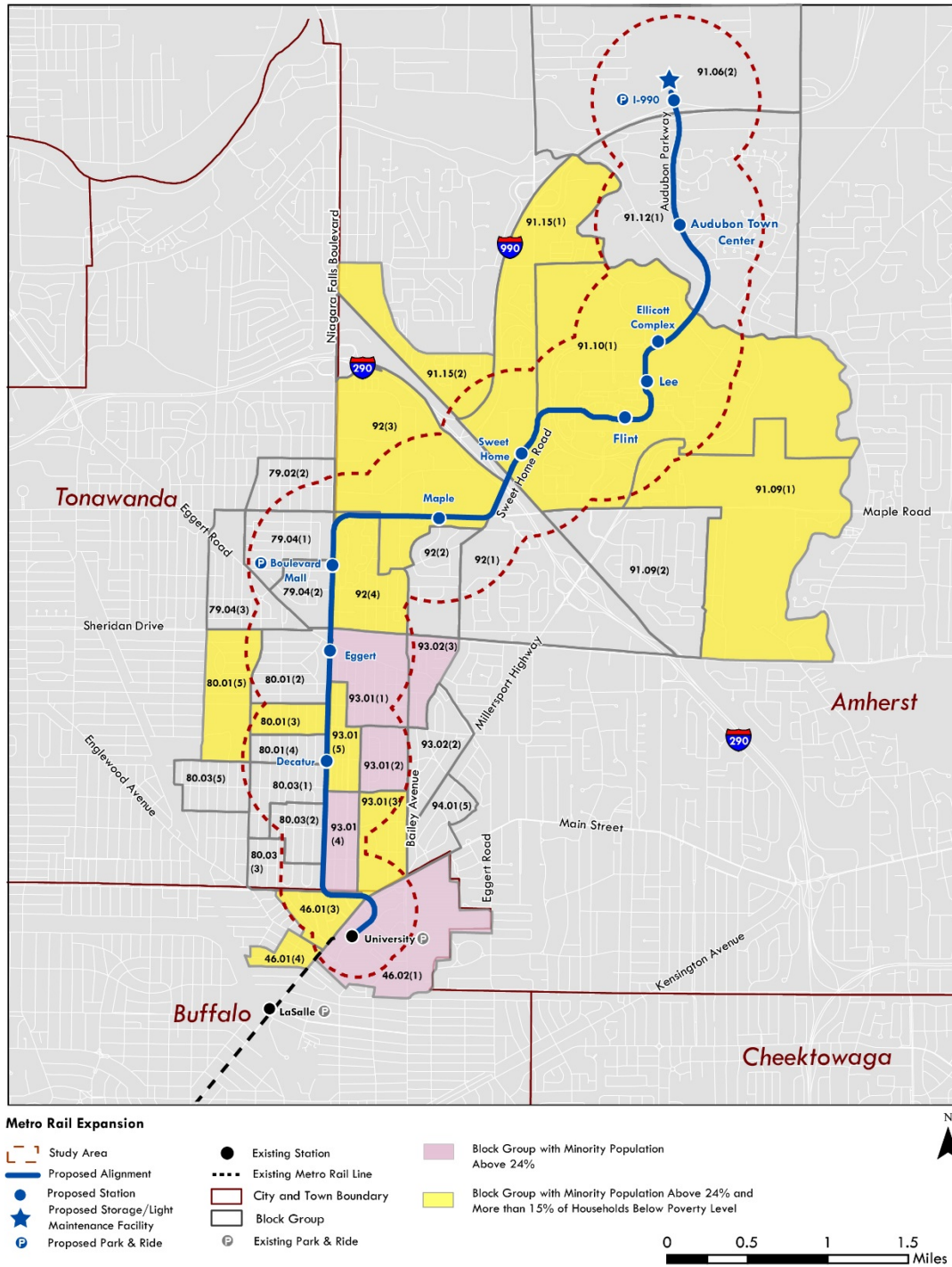
Source: U.S. Census Bureau, ACS 2013-2017.

Figure 6-2. Low-Income Population within the Study Area



Source: U.S. Census Bureau, ACS 2013-2017.

Figure 6-3. Environmental Justice Populations within the Study Area



Source: U.S. Census, ACS 2013-2017.

6.4 FUTURE WITHOUT THE PROPOSED ACTION

In the No Action condition, construction of the Proposed Action would not occur. The existing Metro Rail would not be extended and mobility for study area residents and accessibility to the key destinations in the Proposed Action corridor—the University at Buffalo (UB) campuses, Buffalo Niagara Medical Campus (BNMC), Buffalo Central Business District, business parks, and the Buffalo waterfront—would not be improved. Benefits would not accrue to the environmental justice communities that reside in the Metro Rail service area, which includes Buffalo, or the environmental justice communities identified in the Proposed Action corridor. As indicated in Chapter 1, “Project Description,” residents in the corridor rely heavily on transit. The transit-dependent populations, which include low-income and minority communities, would not benefit from reliable, fast, and frequent service to expanded employment opportunities or educational, recreational, shopping, and cultural destinations. In addition, no new light-rail transit (LRT) stations would be added to the Proposed Action corridor that would attract new transit patrons or encourage economic activity at businesses nearby.

6.5 PROPOSED ACTION

The methodology presented in the FTA Circular involves identifying benefits and adverse effects that would result from a proposed action on the overall population and those that would result to minority and/or low-income populations, and then determining whether adverse effects would be disproportionately high and adverse on the environmental justice population. Section 6.4.1 of this chapter summarizes the benefits and adverse effects of the Proposed Action on the overall population and Section 6.4.2 describes which of those benefits and impacts would occur on environmental justice populations and whether the adverse impacts would fall disproportionately on environmental justice areas.

6.5.1 Benefits and Impacts of the Proposed Action and Measures to Avoid, Minimize, and Mitigate Impacts

The Proposed Action would benefit the communities it serves with an expanded Metro Rail service area with ten new stations. Eight of the new stations would be in or adjacent to environmental justice communities. Residents in the study area rely heavily on transit, and the Proposed Action would provide expanded LRT service with more reliable, frequent, and higher capacity service than currently offered by bus service in the corridor. As described in Chapter 1, “Project Description,” the purpose of the Proposed Action is to provide a fast, reliable, safe, and convenient transit ride in the Metro Rail Expansion corridor, linking established and emerging activity centers along the existing Metro Rail line in Buffalo with existing and emerging activity centers in Amherst and Tonawanda. The Proposed Action would better serve existing rail and bus riders; attract new transit patrons; improve connections to/from Buffalo, Amherst, and Tonawanda; and support local and regional land use planning, redevelopment, and other economic development opportunities. Additionally, the Proposed Action would improve livability by increasing mobility and accessibility in communities throughout the Proposed Action corridor. Table 6-4 presents a summary of the benefits and adverse effects of the Proposed Action on the human environment, based on the analyses presented in other chapters of this DEIS, as well as measures to be implemented to avoid, minimize, or mitigate adverse effects.

Table 6-4. Summary of Benefits and Adverse Effects of the Proposed Action on the Human Environment

Environmental Area	Benefits and Adverse Effects	Measures to Avoid, Minimize, or Mitigate Adverse Effects
Land use, zoning, and community character	<ul style="list-style-type: none"> ▪ Shift in use of some properties where acquisition could be needed ▪ Stations would be compatible with surrounding land uses, underlying zoning, and would support existing and future development in the station areas, particularly retail and business activities, and would serve as a focus for future growth ▪ Proposed Action would be consistent with and would support future land use plans along the Proposed Action corridor ▪ Changes to existing operations and future planning for the UB North Campus 	<ul style="list-style-type: none"> ▪ NFTA would evaluate sustainability measures for incorporation into station designs ▪ Station area plans would be formally adopted and implemented ▪ Tonawanda and Amherst may elect to adjust zoning along the corridor in the future ▪ NFTA would continue to coordinate with UB
Socioeconomic conditions	<ul style="list-style-type: none"> ▪ Proposed Action would support future plans for increased development in the study area that would result in an increase in population, housing, and employment ▪ Loss of tax revenues from private properties acquired for the Proposed Action offset by long-term increase in property values (and resulting taxes) ▪ New permanent jobs in operations and maintenance for the Proposed Action and additional earnings from operations and maintenance expenditures. 	<ul style="list-style-type: none"> ▪ None
Potential property acquisitions and displacements	<ul style="list-style-type: none"> ▪ Acquisition of private property could be required for new stations, proposed widening of Niagara Falls Boulevard, and tunnel portal: <ul style="list-style-type: none"> – Potential full acquisition of 15 properties (2 residential, 10 commercial, 1 parking lot, 2 vacant) – Potential partial acquisition of 148 properties – Potential acquisition of easement property rights from additional properties ▪ Potential displacements: <ul style="list-style-type: none"> – 3 residences at 2 residential properties – 10 businesses ▪ Reductions in existing parking on private property as a result of required road widening on Niagara Falls Boulevard and Maple Road 	<ul style="list-style-type: none"> ▪ Measures developed and incorporated during conceptual design to limit the required right-of-way ▪ All property acquisition, displacement, and relocation to be performed in accordance with federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, FTA Circular 5010.1D, and New York State laws
Community facilities and utilities	<ul style="list-style-type: none"> ▪ No direct effects on community facilities ▪ Benefits to community facilities from increased transit access 	<ul style="list-style-type: none"> ▪ Continued coordination between NFTA and emergency service providers to ensure that design reflects needs of emergency services ▪ Signal designs for the Proposed Action to ensure that efficient emergency services are not impeded

Table 6-4. Summary of Benefits and Adverse Effects of the Proposed Action on the Human Environment (continued)

Environmental Area	Benefits and Adverse Effects	Measures to Avoid, Minimize, or Mitigate Adverse Effects
Visual resources	<ul style="list-style-type: none"> ▪ Changes in visual character along the alignment from the new tracks within existing roadways; new stations within and adjacent to existing roadways; right-of-way widenings; overhead electric wires and associated support poles; new tunnel portals in roadway; new substations; and the new light maintenance/storage facility 	<ul style="list-style-type: none"> ▪ Integration of art in the Proposed Action's design through FTA's Art in Transit Program ▪ Use of best-practices principles to minimize light pollution at stations related to duration and usage, brightness, orientation, directionality, form, and fixtures
Historic and cultural resources	<ul style="list-style-type: none"> ▪ Potential effects to historic resources pending the State Historic Preservation Office (SHPO) concurrence on eligibility ▪ Potential for effects to areas that may contain buried archaeological resources 	<ul style="list-style-type: none"> ▪ Consultation with SHPO regarding potential effects and mitigation ▪ If further design for the Proposed Action indicates disturbance of areas where archaeological resources may be located, additional investigation to be conducted
Parks, recreation areas, and open spaces	<ul style="list-style-type: none"> ▪ No direct effects on parks, recreation areas, or open spaces ▪ Benefits to parks, recreation areas, and open spaces from increased transit access 	<ul style="list-style-type: none"> ▪ See discussion of noise mitigation later in this table
Transportation: Traffic Operations	<ul style="list-style-type: none"> ▪ Some intersection operations improved and some deteriorated; increase in the number of individual traffic movements operating at Level of Service E or F for all time periods compared to the No Action condition. 	Design incorporates improvements to avoid impacts, including operation and capacity changes: <ul style="list-style-type: none"> ▪ New left turn lane northbound on Niagara Falls Boulevard at Longmeadow Drive ▪ Moved alignment into the northwest corner of the Boulevard Mall to avoid interaction with the intersection of Niagara Falls Boulevard and Maple Road ▪ Additional northbound through lane on Sweet Home Road at Maple Road ▪ Underground alignment through the intersection of Sweet Home Road and Maple Road ▪ Signalization of John James Audubon Pkwy / Sylvan Pkwy intersection ▪ Use of signal coordination and connected signals to allow the Metro Rail vehicles to operate without stopping at intersections while satisfying vehicular demand in at least one direction while the light-rail passes

Table 6-4. Summary of Benefits and Adverse Effects of the Proposed Action on the Human Environment (continued)

Environmental Area	Benefits and Adverse Effects	Measures to Avoid, Minimize, or Mitigate Adverse Effects
Transportation: Transit	<ul style="list-style-type: none"> ▪ Introduction of new light-rail transit service with 10 new stations that would connect many of the region’s important employment, institutional, shopping, and entertainment centers ▪ Increase of approximately 12,000 riders on Metro Rail system; highest new ridership at University Station, Boulevard Mall, Flint, and Ellicott Complex ▪ Rerouting of three Metro Bus routes and discontinuation of UB shuttle bus service between the UB North and UB South Campuses 	<ul style="list-style-type: none"> ▪ None
Transportation: Parking	<ul style="list-style-type: none"> ▪ New park & ride facilities at Boulevard Mall and I-990 Stations ▪ Reductions in existing parking on private property as a result of required road widening on Niagara Falls Blvd and Maple Road affecting approximately 875 parking spaces; most could be relocated to other portions of the affected properties 	<ul style="list-style-type: none"> ▪ All property acquisition, displacement, and relocation to be performed in accordance with federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, FTA Circular 5010.1D, and New York State laws
Transportation: Pedestrians and Bicycles	<ul style="list-style-type: none"> ▪ New multi-use paths, bicycle lanes, and median refuge areas for pedestrians to be created as part of the Proposed Action ▪ New continuous sidewalks to be provided along both sides of the alignment, filling in existing gaps ▪ Crosswalks with push buttons to activate the “walk” signal and countdown clocks to be provided ▪ ADA improvements to intersections along the corridor 	<ul style="list-style-type: none"> ▪ None

Table 6-4. Summary of Benefits and Adverse Effects of the Proposed Action on the Human Environment (continued)

Environmental Area	Benefits and Adverse Effects	Measures to Avoid, Minimize, or Mitigate Adverse Effects
Noise	<p>Noise levels exceeding FTA impact thresholds resulting from operation of the new transit system:</p> <ul style="list-style-type: none"> ▪ Moderate impacts at certain locations, where noise increases would be barely perceptible ▪ Moderate impact at Lockwood Memorial Library at UB North Campus that would be readily noticeable, but library windows and masonry walls would reduce interior noise levels so that an adverse noise effect would not occur ▪ Moderate and severe impacts at residences within 172 feet of John James Audubon Parkway between Dodge Rd and the Amherst police station 	<ul style="list-style-type: none"> ▪ Noise analysis assumed use of the following to reduce noise levels: <ul style="list-style-type: none"> – All new fleet of rail vehicles along the existing rail line and extension; vehicles to include rail skirts that break the line of sight between wheel-rail contact point and adjacent properties – Signals at entrance and exit of tunnel to produce noise level not greater than 83 dBA at a distance of 50 feet ▪ Additional noise reduction measures, including wayside noise barriers, removal of at-grade crossings, etc., either not feasible or would not provide additional benefit
Vibration	<ul style="list-style-type: none"> ▪ Potential for adverse effects to vibration-sensitive equipment in Bonner Hall, Davis Hall, and Furnas Hall at UB North Campus ▪ Potential adverse vibration impacts and adverse ground-borne noise impacts at the following locations: <ul style="list-style-type: none"> – Residences on Niagara Falls Blvd within 140 feet of underground track – Residences on Niagara Falls Blvd within 165 feet of at-grade track – Residences on the east side of John James Audubon Pkwy between Dodge Rd and the Amherst police station within 160 feet of at-grade track ▪ Potential adverse ground-borne noise impacts at performance hall in Alan Hall at UB South Campus 	<ul style="list-style-type: none"> ▪ Detailed evaluation of vibration effects on sensitive equipment at UB North Campus during later phases of design and implementation of mitigation if impacts identified ▪ Design features to reduce vibration, including resilient fasteners for direct fixation track and resilient rail ties (ballast mats) for ballasted areas ▪ Ongoing preventive maintenance for vehicles and rails to avoid vibration associated with rough or flattened wheels
Air quality	<ul style="list-style-type: none"> ▪ No adverse effects 	<ul style="list-style-type: none"> ▪ None
Hazardous and contaminated materials	<ul style="list-style-type: none"> ▪ No adverse effects 	<ul style="list-style-type: none"> ▪ None

Table 6-4. Summary of Benefits and Adverse Effects of the Proposed Action on the Human Environment (continued)

Environmental Area	Benefits and Adverse Effects	Measures to Avoid, Minimize, or Mitigate Adverse Effects
Construction effects	<ul style="list-style-type: none"> ▪ Construction-related disruption, especially near Main Street shaft site and staging area at Kenmore Ave / Niagara Falls Blvd ▪ Temporary disruptions to access to nearby uses ▪ Adverse effects on local businesses due to access restrictions, loss of parking and landscape, signage removal, traffic congestion, noise, and dust ▪ Need for utility relocations ▪ Disruptions to vehicular, pedestrian, and bicycle traffic ▪ Disruptions to existing bus service ▪ Construction-related noise audible in surrounding areas; noise from construction vehicles on local roadways ▪ For locations near substation construction, noise in excess of FTA impact thresholds, but due to short duration of construction and small magnitude of exceedances, would not constitute an adverse effect ▪ Perceptible vibration associated with construction activities ▪ Potential to encounter contaminated soil or groundwater during construction 	<ul style="list-style-type: none"> ▪ Minimizing parking disruptions ▪ Notifications to businesses of traffic interruptions; potential development of business continuity plans for local businesses ▪ Coordination with emergency service providers to ensure access is maintained ▪ Utility relocation in advance of construction ▪ Use of maintenance and protection of traffic measures ▪ No construction during nighttime hours (10 p.m. – 7 a.m.) ▪ Trucks routed to avoid noise-sensitive land uses wherever possible ▪ Use of low noise construction equipment and lower noise construction methodologies ▪ Vibration monitoring at structures near vibration-intensive construction activity ▪ Use of dust control measures ▪ Further investigation of potentially contaminated sites; appropriate clean-up and remediation during construction
Indirect and cumulative effects	<ul style="list-style-type: none"> ▪ Strong potential for transit-oriented development close to the new stations ▪ The Proposed Action would complement existing land use plans, which call for up to 8.4 million square feet of new commercial and residential space within ½ mile of existing and new Metro Rail stations, once zoning and land use policies are revised to accommodate growth ▪ Positive economic benefits as a result of the increase in jobs and housing ▪ Potential increase in property values close to transit stations that could create a burden for some households and could result in business displacement ▪ Potential for cumulative impacts of new transit system with other developments proposed or planned nearby 	<ul style="list-style-type: none"> ▪ Coordination between NFTA, Amherst, and Tonawanda regarding transit-oriented development along the Proposed Action alignment

6.5.2 Potential for Disproportionately High and Adverse Effects on Environmental Justice Populations

The methodology presented in the FTA Circular involves identifying adverse effects and benefits that would result from a proposed action on the overall population and those that would result to minority and/or low-income populations, and then determining whether adverse effects would be disproportionately high and adverse on the environmental justice population. As defined in the guidance documents, a disproportionately high and adverse effect on an environmental justice population is an adverse effect that is predominantly borne by a minority and/or low-income population, or would be appreciably greater for the minority and/or low-income population than for the non-minority and/or non-low-income population. Effects that could occur as a result of a proposed action could be considered in the context of associated mitigation measures and offsetting benefits when determining whether disproportionately high and adverse effects would occur.

All of the effects of the Proposed Action presented in this DEIS and summarized in Table 6-4 would occur in both environmental justice communities and non-environmental justice communities. As shown in Figure 6-3, most of the new alignment for the Proposed Action, including eight of the 10 new stations, would be located within or adjacent to environmental justice communities. The Proposed Action alignment would also be located within or adjacent to areas that are not environmental justice communities: three of the new stations would abut environmental justice communities on the east side of the alignment and communities that are not environmental justice communities on the west, and the two northernmost stations would be wholly within areas that are not environmental justice communities (Figure 6-3). Therefore, the effects of the Proposed Action would occur both to areas that are environmental justice communities and areas that are not. As noted in Table 6-4, NFTA will implement measures to avoid, minimize, or mitigation adverse impacts of the Proposed Action throughout the corridor.

Overall, the Proposed Action would introduce new fast and reliable transit service in the Project corridor, bringing a substantial benefit to the corridor. This benefit would be most notable for low-income residents and employees who are transit-dependent. For these residents and employees in particular, the Proposed Action would greatly improve opportunities for participation of the workforce in the overall regional economy.

The Proposed Action would also be consistent with and supportive of local land use plans and redevelopment in the Project Corridor, which is predominantly within environmental justice areas. This redevelopment in turn would bring additional benefits to the Proposed Action corridor.

Other effects that would occur in environmental justice areas, after accounting for implementation of measures to avoid, minimize, or mitigate adverse effects would include the following:

- Given that most of the Proposed Action corridor is within or adjacent to environmental justice areas, the property acquisitions that could be required for the Proposed Action would also occur predominantly within environmental justice areas. Ten of the 15 potential full property acquisitions and 90 of the 148 potential partial acquisitions required would be in environmental justice communities.
- Changes in visual character would occur for the length of the Proposed Action corridor, including in environmental justice communities and non-environmental justice communities.

- Most of the changes in traffic conditions predicted with the Proposed Action would occur on roadways within or adjacent to environmental justice communities, since most of the Proposed Action corridor is within or adjacent to environmental justice communities. The Proposed Action corridor also abuts and passes through non-environmental justice communities, which would also see changes in traffic conditions as a result of the Proposed Action.
- Improvements to pedestrian and bicycle accommodations, including new on-street bike lanes, continuous sidewalks along both sides of the alignment, and the addition of crosswalks with countdown clocks and pedestrian refuge areas, would be made throughout the corridor.
- Adverse noise impacts on residences close to John J. Audubon Parkway would be in non-environmental justice areas.
- Adverse vibration and ground-borne noise impacts would occur in both environmental justice areas and non-environmental justice areas.
- Adverse effects during construction would occur throughout the Proposed Action corridor, including in environmental justice communities and non-environmental justice communities.

Overall, the Proposed Action would bring substantial benefits to environmental justice communities. It would also result in some temporary (during construction) and permanent (during operation) adverse impacts throughout the Proposed Action corridor. Since the corridor passes through and adjacent to both environmental justice communities and non-environmental justice communities, these effects would not occur disproportionately on environmental justice communities.

6.5.3 Environmental Justice Conclusion

For actions that are found to have a disproportionately high and adverse effect on minority or low-income populations, the U.S. DOT Order requires that these actions be carried out only if the following apply:

1. Further mitigation measures or alternatives that would avoid or reduce the disproportionately high and adverse effect are not practicable. In determining whether a mitigation measure or alternative is practicable, the social, economic (including cost), and environmental effects of avoiding or mitigating the adverse effects would be taken into account.
2. A substantial need for the action exists, based on overall public interest, and alternatives that would have less adverse effects on protected populations (and that still satisfy the need for the project) would have other adverse social, economic, environmental, or human health impacts that are severe, or would involve increased costs of extraordinary magnitude.

While the analysis presented in this chapter concludes that the Proposed Action would not result in disproportionately high and adverse effects on environmental justice populations, the Proposed Action would nonetheless meet the requirements of the U.S. DOT Order relating to mitigation measures and the need for the Proposed Action.

The analysis conducted for the Proposed Action was consistent with NYSDEC's environmental justice policy, CP-29. It identifies the burdens on environmental justice communities in Section 6.4.2 and it describes the enhanced public participation plan NFTA developed to keep the public informed about the Proposed Action.

6.5.3.1 Mitigation

NFTA has incorporated mitigation measures into the Proposed Action, during conceptual design, to avoid or minimize adverse effects of the new transit system where practicable. Additional measures would be taken during construction to mitigate adverse impacts resulting from construction activities. Mitigation measures are summarized in Table 6-4.

6.5.3.2 Need for the Action

Chapter 1, “Project Description,” describes the purpose and need for the Proposed Action. The purpose of the Proposed Action is to provide a fast, reliable, safe, and convenient transit ride in the Proposed Action corridor, linking established and emerging activity centers along the existing Metro Rail line in Buffalo with existing and emerging activity centers in Amherst. The Proposed Action would better serve existing rail and bus riders, attract new transit patrons, improve connections to/from Buffalo, Amherst, and Tonawanda, and support redevelopment and other economic development opportunities. Additionally, the Proposed Action would improve livability by increasing mobility and accessibility in communities throughout the Proposed Action corridor. The need for improved transit service has three main components: (1) to serve increased travel demand generated by recent, pending, and future development; (2) to provide high-quality transit service to key activity centers; and (3) to better serve transit-dependent population segments.

6.6 PUBLIC INVOLVEMENT

As noted in the FTA Circular, a key component of environmental justice is engaging environmental justice populations as part of the transportation planning process. This allows project sponsors to understand the needs and priorities of environmental justice populations and to balance the benefits of a proposed project against its adverse effects. In addition, Title VI of the Civil Rights Act of 1964 and Executive Order 13166 “Improving Access to Services for Persons with Limited English Proficiency,” which was signed on August 11, 2000, states that people with Limited English Proficiency should have meaningful access to federally conducted and funded programs and activities.

NFTA has implemented a robust outreach program that includes substantial targeted outreach to minority and low-income populations. A summary of outreach activities is provided in Appendix C, “Public Outreach and Coordination Report”. Full and fair participation by potentially affected communities was encouraged in accordance with CEQ guidance, the U.S. DOT Order, and the FTA Circular. The key elements of the public outreach program for the Proposed Action are described in this section. The outreach program is intended to target existing Metro Rail riders and residents and workers in the Proposed Action corridor, of which many are located in environmental justice communities.

6.6.1 Outreach for Environmental Review Milestones

SEQRA requires public input prior to preparing a DEIS during the scoping phase for the environmental analysis, and input once a DEIS has been prepared.

6.6.1.1 Scoping

A scoping meeting was held on February 12, 2019 at Sweet Home Middle School in Amherst (within one of the environmental justice communities in the study area) to collect public input on the draft scope of work for the preparation of an environmental impact statement. Email notifications were distributed to elected officials, and parties who signed up via the project website to be on the email distribution list. Notices of the meeting were published in the *Buffalo News*, *KenTon*, and *Amherst Bees*.

At the meeting, NFTA and its consultant team made a presentation about the Proposed Action. Information about the Proposed Action was also available in display boards, a scoping meeting brochure, and a draft scoping document. NFTA's project team members were available to answer questions, and Spanish, Mandarin, and ASL translators were available. Attendees were encouraged to offer feedback by attaching sticky notes to a map rollout, filling out official comment cards, or speaking to a stenographer. Comment cards could also be mailed in after the meeting. The scoping meeting was attended by over 80 members of the public. Attendees left nine comments on the rollout map, 21 completed comment cards, and three comments with the stenographer.

6.6.1.2 Public Review of DEIS

The DEIS was made available to the public on January 24, 2020. NFTA is accepting public comments on this DEIS via the project website, email, and regular mail through March 24, 2020. During the 60-day comment period, public hearings will be held at which members of the public can offer oral testimony on the findings of the DEIS. Written comments will also be accepted.

6.6.2 Public Meetings, Open Houses, and Workshops

NFTA has hosted and will continue to host public meetings, open houses, and workshops to provide information to the public about the Proposed Action and solicit feedback regarding design and environmental effects. These events have been held, and will continue to be held, at a variety of venues throughout the study area, including locations in Buffalo, Tonawanda, and Amherst. See Appendix C, "Public Outreach and Coordination Report" for a full list of outreach activities. As of the publication of this DEIS, three public meetings have been held, as follows:

- December 6, 2018 public open house at Sweet Home Middle School in Amherst to provide the results of the re-evaluation of the Locally Preferred Alternative. The Sweet Home Middle School is located within one of the environmental justice communities in the study area. At this meeting, commenters noted that the Proposed Action would increase access and employment opportunities for non-drivers.
- June 11, 2019 public workshop at UB South Hayes Hall to present various station design concepts, ridership projections, and traffic analysis results. South Hayes Hall is on UB's South Campus, which is an environmental justice area.
- September 24, 2019 public workshop at Sweet Home Middle School to present the concept design plans, updated station design concepts, traffic analysis results, and preliminary environmental analysis and impacts. At this meeting, commenters noted that the Proposed Action would increase access to job recruitment and employment, and therefore would help to address job disparity between the City of Buffalo and its suburbs.

6.6.3 Community Events

In addition to the larger public meetings and open houses, NFTA has held and will continue to hold smaller informal events targeted to the local communities. To reach local community members who might not attend more formal events, “pop-up” events are held at neighborhood locations, such as existing Metro Rail transit stations, supermarkets, and libraries, and at community-based events like fairs and parades. To date, these have included the following:

- February 6, 2019 pop-up event at the existing Metro Rail University Station from 2:30 to 5:30 PM. At this event, NFTA staff and project team members provided information on the project. Materials available included iPads to provide access to the project website, comment cards, project brochures, boards with a map of the Proposed Action, potential benefits of the expansion and a station rendering, as well as information on the upcoming scoping meeting. The meeting was held in the mid-afternoon to evening to accommodate non-traditional work schedules. University Station is at the UB South Campus, which is part of an environmental justice area. An estimated 80 Metro Rail riders were engaged during the event. One comment card was collected at the event and 14 riders signed up to receive additional information on the project.
- June 21, 2019, pop-up event at the existing Metro Rail Allen Medical Campus Station from 4:00 to 6:00 PM. The format of the event included project team members providing information on the Proposed Action. Materials available included comment cards, project brochures, boards with a map of the Proposed Action, history and schedule of the project and a guide to the environmental review process. iPads were available to access to the project website and a station design and connections questionnaire; a raffle with a monthly pass as the prize was used to provide an incentive for participating in the questionnaire. An estimated 30 Metro Rail riders were engaged during the event.
- June 27, 2019, pop-up event at the existing Metro Rail LaSalle Station from 4:00 to 6:00 PM. The format of the event included project team members providing information on the Proposed Action. Materials available included comment cards, project brochures, boards with a map of the Proposed Action, history and schedule of the project and a guide to the environmental review process. iPads were available to access to the project website and a station design and connections questionnaire; a raffle with a monthly pass as the prize was used to provide an incentive for participating in the questionnaire. An estimated 30 Metro Rail riders were engaged during the event.
- July 9, 2019, pop-up event at the existing Metro Rail University Station from 3:30 to 5:30 PM. The format of the event included project team members providing information on the Proposed Action. Materials available included comment cards, project brochures, boards with a map of the Proposed Action, history and schedule of the project and a guide to the environmental review process. iPads were available to access to the project website and a station design and connections questionnaire; a raffle with a monthly pass as the prize was used to provide an incentive for participating in the questionnaire. An estimated 15 Metro Rail riders were engaged during the event.

- July 24, 2019, pop-up event on the Metro 34 bus between University Station and Maple Road from 3:30 to 5:30 PM. This portion of the Metro 34 bus route covers the territory proposed for the new rail expansion's first four new stations, which are each within environmental justice areas. The format of the event included project team members riding the bus and providing information on the Proposed Action. Team members spoke with bus riders, distributed project brochures and encouraged the provision of contact information through a raffle to win a monthly pass. An estimated 80 riders were engaged through the course of the event with 40 riders entering the raffle and providing contact information.
- August 9, 2019 pop-up event at the UB on the Green event at the University at Buffalo South Campus from 5:00 to 8:00 PM. The UB South Campus is contiguous with a census block included in the environmental justice areas. The format of the event included project team members providing information on the proposed Metro Rail expansion. Materials available included comment cards, project brochures, boards with a map of the Proposed Action, history and schedule of the project and a guide to the environmental review process. iPads were available to access to the project website and a station design and connections questionnaire. UB on the Green incentivizes participants to visit vendor tables by providing vendors with raffle tickets for prizes to give to attendees that visit a table. An estimated 60 attendees were engaged during the event.
- August 15, 2019 pop-up event at the Erie County Central Library Annual Book Sale from 2:00 to 4:00 PM. The format of the event included project team members providing information on the proposed Metro Rail expansion. Materials available included comment cards, project brochures, boards with a map of the Proposed Action, history and schedule of the project and a guide to the environmental review process. iPads were available to access to the project website and a station design and connections questionnaire; a raffle with a monthly pass as the prize was used to provide an incentive for participating in the questionnaire. An estimated 10 attendees were engaged in the course of the book sale.
- August 20, 2019 pop-up event at Kenilworth Library from 2:00 to 4:00 PM. The format of the event included project team members providing information on the proposed Metro Rail expansion. Materials available included comment cards, project brochures, boards with a map of the Proposed Action, history and schedule of the project and a guide to the environmental review process. iPads were available to access to the project website and a station design and connections questionnaire; a raffle with a monthly pass as the prize was used to provide an incentive for participating in the questionnaire. An estimated 10 attendees were engaged during the event.

6.6.4 Outreach with Key Stakeholders

NFTA is coordinating with key stakeholders in the project area during design and environmental review. These stakeholders include NFTA customers, municipal representatives, property and business owners, and members of various advocacy groups with a vested interest in the Proposed Action.

To date, stakeholder meetings have included three meetings with local neighborhood associations near the Proposed Action corridor:

- June 27, 2019: Audubon Homeowners' Association
- July 2, 2019: Harford Estates/North Bailey Homeowners' Association
- July 30, 2019: Willow Ridge Civic Association

At these meetings, NFTA staff presented the Proposed Action and responded to questions.

6.6.5 Project Website

NFTA is hosting a project website that provides information on the design and environmental review process and allows public input and comment through comment forms and an interactive project map. The project website is available at: <https://www.nftametrorailexpansion.com/>.

6.6.6 Limited English Proficiency Populations

In addition to low-income and minority populations, the study area has large Spanish- and Chinese Mandarin-speaking populations. The project website is equipped with Google Translate to accommodate community members with Limited English Proficiency.