

ILLINOIS  
TERMINAL  
EXPANSION

AT THE  
YARDS  
CHAMPAIGN

# Environmental Assessment

Illinois Terminal Expansion at the Yards  
Champaign-Urbana Mass Transit District

*Champaign, Illinois*

May 2021



# Illinois Terminal Expansion at The Yards

## ENVIRONMENTAL ASSESSMENT

Prepared by:

United States Department of Transportation

Federal Transit Administration (FTA)

and

Champaign-Urbana Mass Transit District (MTD)

Pursuant to:

National Environmental Policy Act of 1969, as amended, 42 USC § 4321 et seq.; Council on Environmental Quality regulations, 40 CFR Part 1500 et seq.; Federal Transit Laws, 49 USC Chapter 53; Environmental Impact and Related Procedures, 23 CFR Part 771, a joint regulation of the Federal Highway Administration and Federal Transit Administration implementing National Environmental Policy Act and Council on Environmental Quality regulations; Section 106 of the National Historic Preservation Act of 1966, 16 USC § 470(f); Section 4(f) of the Department of Transportation Act of 1966, as amended, 49 USC § 303; Section 6(f)(3) of the Land and Water Conservation Fund Act of 1965, 16 USC § 4601-4 et seq.; Clean Water Act, as amended, 42 USC § 1251 et seq.; Clean Air Act, as amended, 42 USC § 7401 et seq.; Endangered Species Act of 1973, as amended, 16 USC § 1531 et seq.; Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, 42 USC § 4601 et seq.; Executive Order No. 12898 (Federal Actions to Address Environmental Justice in Minority and Low-Income Populations); Executive Order No. 13166 (Improving Access to Services for Persons with Limited English Proficiency); Executive Order No. 11988 (Floodplain Management); and other applicable federal laws and procedures.

This document also complies with all relevant laws and procedures of the State of Illinois.

**KELLEY BROOKINS**

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# Table of Contents

---

1. Introduction .....	1
1.1. Project History .....	1
1.2. Project Description .....	1
1.3. Project Location .....	2
1.4. Project Schedule .....	3
1.5. Comments on the Environmental Assessment.....	4
2. Purpose and Need for the Illinois Terminal Expansion .....	6
2.1. Purpose of the Project .....	6
2.2. Need for the Project .....	6
3. Alternatives .....	11
3.1. No Build Alternative.....	11
3.2. Build Alternative .....	12
4. Environmental Resources, Impacts, and Mitigation Measures .....	17
4.1. Environmental Issue Areas Requiring No Further Evaluation.....	17
4.2. Transportation .....	18
4.3. Land Use Compatibility .....	28
4.4. Neighborhoods and Community Resources .....	35
4.5. Land Acquisitions and Relocations .....	39
4.6. Economics .....	41
4.7. Visual Resources and Aesthetics.....	44
4.8. Cultural Resources .....	47
4.9. Environmental Justice .....	51
4.10. Safety and Security .....	59
4.11. Utilities .....	61
4.12. Water Resources, Geology, and Soils .....	63
4.13. Hazardous Materials .....	67
4.14. Noise and Vibration .....	75
4.15. Air Quality .....	82
4.16. Threatened and Endangered Species .....	84
4.17. Indirect and Cumulative Effects.....	86

5. Section 4(f) Evaluation .....	92
5.1. Legal/Regulatory Context and Methodology .....	92
5.2. Existing Conditions.....	93
5.3. Environmental Impacts .....	93
5.4. Measures to Avoid or Minimize Harm .....	94
5.5. Conclusion.....	94
6. Public Involvement and Agency Coordination .....	95
6.1. Public Outreach.....	95
6.2. Environmental Justice Outreach .....	96
6.3. Agency Coordination.....	97
7. Preparers .....	98
8. References.....	100

## Figures

---

Figure 1. Illinois Terminal Expansion Project .....	2
Figure 2. Illinois Terminal Expansion Project Area.....	3
Figure 3. Project Schedule.....	4
Figure 4. Crashes near the Illinois Terminal (2005 – 2019).....	7
Figure 5. Site Layout for First Floor of Illinois Terminal Expansion .....	13
Figure 6. Site Layout for Second Floor of Illinois Terminal Expansion .....	13
Figure 7. Second Floor Pedestrian Connections .....	14
Figure 8. Site Layout for Illinois Terminal Expansion .....	15
Figure 9. Universal Transfer Platform and Driveway Utilization.....	20
Figure 10. Total Weekday Local and Intercity Buses at Illinois Terminal (15-Minute Intervals) .....	20
Figure 11. Parking Lots within or adjacent to Project Area .....	22
Figure 12. Parking Lot Relocation .....	25
Figure 13. Temporary Bus Staging during Construction .....	27
Figure 14. Existing Land Use.....	30
Figure 15. Parcel Ownership .....	31
Figure 16. Downtown Future Land Use .....	32

Figure 17. Community Resources within 0.25 mile of the Project Area ..... 36

Figure 18. View from University Avenue Looking South..... 46

Figure 19. View from Walnut Street and Logan Street, Looking North ..... 46

Figure 20. Architectural Resources Survey Results - Overview ..... 50

Figure 21. Minority Population in the Study Area ..... 54

Figure 22. Low Income Population within Study Area ..... 56

Figure 23. Storm and Sanitary Sewer Facilities ..... 61

Figure 24. Mahomet Designated Sole Source Aquifer and Community Water Supply Wells ..... 65

Figure 25. Historical Uses of Project Area..... 69

Figure 26. Illinois Terminal Expansion Project and The Yards Private Development ..... 89

# Tables

---

Table 1. Joint Development Mixed-Use Structure Conceptual Plan Programming ..... 16

Table 2. Average Daily Traffic (ADT) Volumes..... 23

Table 3. Illinois Terminal Expansion Project Proposed Additional Traffic – Weekday PM Peak Hour ..... 24

Table 4. Community Profile for Champaign County and Study Area ..... 37

Table 5. Quantified Benefits of Build Alternative, 2023 to 2040 ..... 42

Table 6. Race within the Study Area ..... 53

Table 7. Population by Income to Poverty Level Ratio ..... 55

Table 8. Elderly and/or Disabled Population ..... 57

Table 9. Noise Land Use Categories ..... 77

Table 10. Federal and State Threatened or Endangered Species ..... 84

Table 11. Present and Reasonably Foreseeable Future Projects..... 87

Table 12. Scope of Illinois Terminal Expansion Project and Proposed Private Development South of Logan Street..... 89

Table 13. Indirect and Cumulative Impacts ..... 90

Table 14. Social Media Engagement for Virtual Public Meeting..... 96

# Appendices

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Appendix A. Transportation Technical Memorandum

Appendix B. Benefit-Cost Analysis

Appendix C. Illinois Terminal Architectural Survey

Appendix D. Environmental Justice Technical Memorandum

Appendix E. Phase I Environmental Site Assessment and Phase II Environmental Site Assessment

Appendix F. Noise and Vibration Technical Memorandum

Appendix G. Threatened and Endangered Species Consultation and Species Lists

Appendix H. Public and Agency Outreach Materials

# Abbreviations and Acronyms

Abbreviation/Acronym	Definition
ACS	American Community Survey
ADA	Americans with Disabilities Act
ADT	Average Daily Traffic
APE	Area of Potential Effects
ASTM	American Society for Testing and Materials
BCA	Benefit-Cost Analysis
BMP	Best Management Practices
CAA	Clean Air Act
C-CARTS	Champaign County Area Regional Transportation System
CCRPC	Champaign County Regional Planning Commission
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CN	Canadian National
CO	Carbon Monoxide
CREC	Controlled Recognized Environmental Condition
CUUATS	Champaign Urbana Urbanized Area Transportation Study
CWA	Clean Water Act
dBA	A-weighted decibels
DNR	Department of Natural Resources
DOT	Department of Transportation
EA	Environmental Assessment
EcoCAT	Ecological Compliance Assessment Tool
EJ	Environmental Justice
EO	Executive Order
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
FHWA	Federal Highway Administration
FONSI	Finding of No Significant Impact
FTA	Federal Transit Administration
FY	Fiscal Year
GHG	Greenhouse Gas
GIS	Geographic Information System
HREC	Historic Recognized Environmental Condition
ILCS	Illinois Compiled Statutes
IPaC	Information for Planning and Consultation
ITE	Institute of Transportation Engineers
L <sub>dn</sub>	Day-Night Average Sound Level
LEP	Limited English Proficiency
L <sub>eq</sub>	Equivalent average sound
LOS	Level of Service
LRTP	Long Range Transportation Plan

Abbreviation/Acronym	Definition
LUST	Leaking Underground Storage Tank
L <sub>v</sub>	Vibration Velocity Level
MMP	Materials Management Plan
MSAT	Mobile Source Air Toxics
MTD	Champaign-Urbana Mass Transit District
MTP	Metropolitan Transportation Plan
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NFA	No Further Action
NFR	No Further Remediation
NHPA	National Historic Preservation Act
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
PCB	Polychlorinated biphenyls
PCP	Pentachlorophenol
PPV	Peak Particle Velocity
PTASP	Public Transportation Agency Safety Plan
RCRA	Resource Conservation and Recovery Act
READY	Regional Alternative for Developing Youth
REC	Recognized Environmental Condition
SHPO	State Historic Preservation Office
SIP	State Implementation Plan
SVOC	Semi-Volatile Organic Compound
TIF	Tax Increment Financing
TRB	Transportation Research Board
U.S. DOT	United States Department of Transportation
USC	United States Code
USDA	United States Department of Agriculture
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	Underground Storage Tank
VdB	Vibration Decibels
VOC	Volatile Organic Compound



# 1. Introduction

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The Federal Transit Administration (FTA), as the lead federal agency, and the Champaign-Urbana Mass Transit District (MTD), as the local project sponsor, jointly prepared this Environmental Assessment (EA) to assess the potential social, economic, and environmental impacts of the proposed Illinois Terminal Expansion Project (Project) in Champaign County, Illinois.

## 1.1. Project History

Located in the heart of downtown Champaign, Illinois, Illinois Terminal is the primary community transportation hub for the region. It serves ten local routes for MTD, intercity bus service for five rural transit agencies and three intercity bus services. A true multi-modal facility, Illinois Terminal is also home to Champaign's Amtrak station and is heavily utilized by transit users, bicyclists, and pedestrians. The facility features indoor and outdoor passenger waiting areas as well as commercial space. The commercial space has been fully leased out since the facility opened in 1999.

As service by MTD and other bus service operators grew, Illinois Terminal began to see capacity constraints. In 2015, MTD completed an expansion study to identify feasible options to expand Illinois Terminal to meet both current and projected growth through 2035. The 2015 Expansion Study also examined market value of MTD properties in Downtown Champaign, outlined financing strategies to increase the value of the Illinois Terminal property, and recommended an implementation strategy for expansion.

In 2017, MTD began discussions with a local developer and the City of Champaign about coordinating the facility improvements at Illinois Terminal with planned private investment in this area. The parties agreed that a partnership in the form of a Joint Development would best maximize planned investments and integrate transit and transit-supportive improvements.

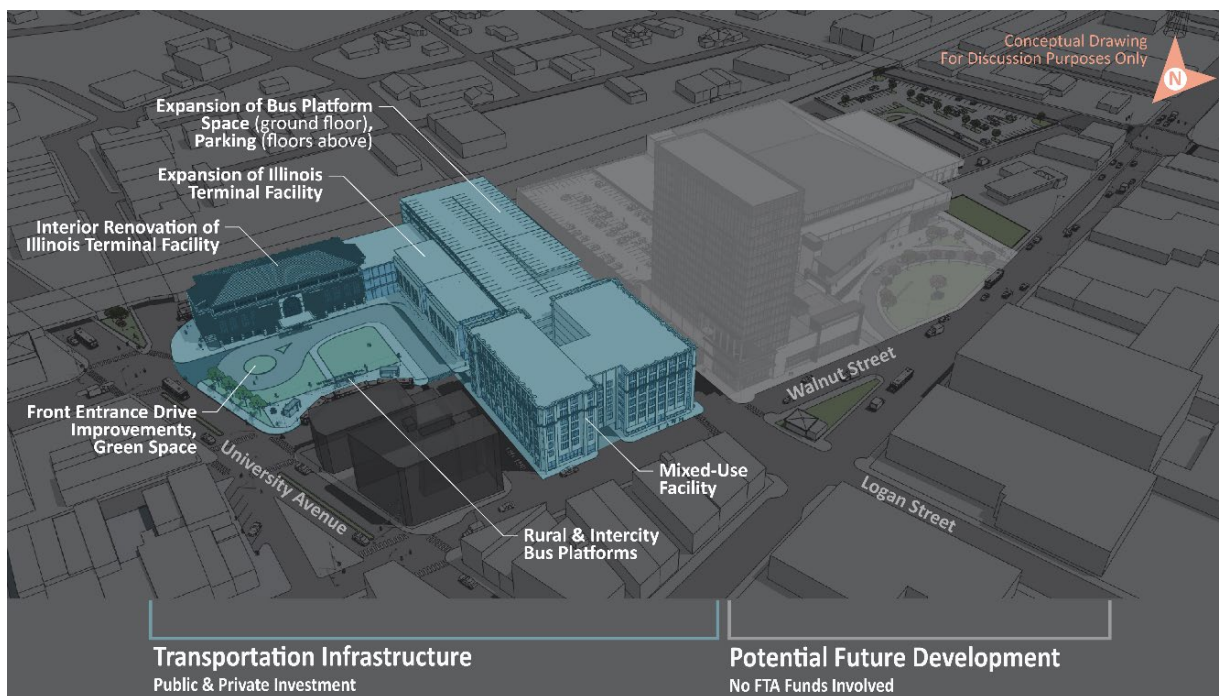
The Illinois Terminal Expansion joint development initiative would include transit uses and private development within the expanded facility. A Joint Development Agreement between MTD and a private developer would be executed in accordance with FTA's definition of joint development (49 U.S.C. § 5302(3)(G)) and requirements outlined in FTA Circular 7050.1B. The Joint Development application would be reviewed and approved by FTA to ensure compliance with the statutory criteria.

## 1.2. Project Description

FTA awarded MTD a Section 5339 Bus and Bus Facilities grant in 2019 and Urbanized Area Formula 5307 funding to complete the Illinois Terminal Expansion Project evaluated in this EA. Illustrated in blue on Figure 1, the proposed Project includes:

1. Expansion of bus platforms, including dedicated space for rural and intercity services;
2. Construction of controlled pedestrian access to bus platforms and visibility improvements;
3. Interior renovation and expansion of the Illinois Terminal and waiting areas;
4. Construction of a mixed-use structure that connects to Illinois Terminal and includes bus platforms, waiting areas, expanded leasable space, residential units, and a parking deck that supports these uses; and
5. Land acquisition.

**Figure 1. Illinois Terminal Expansion Project**



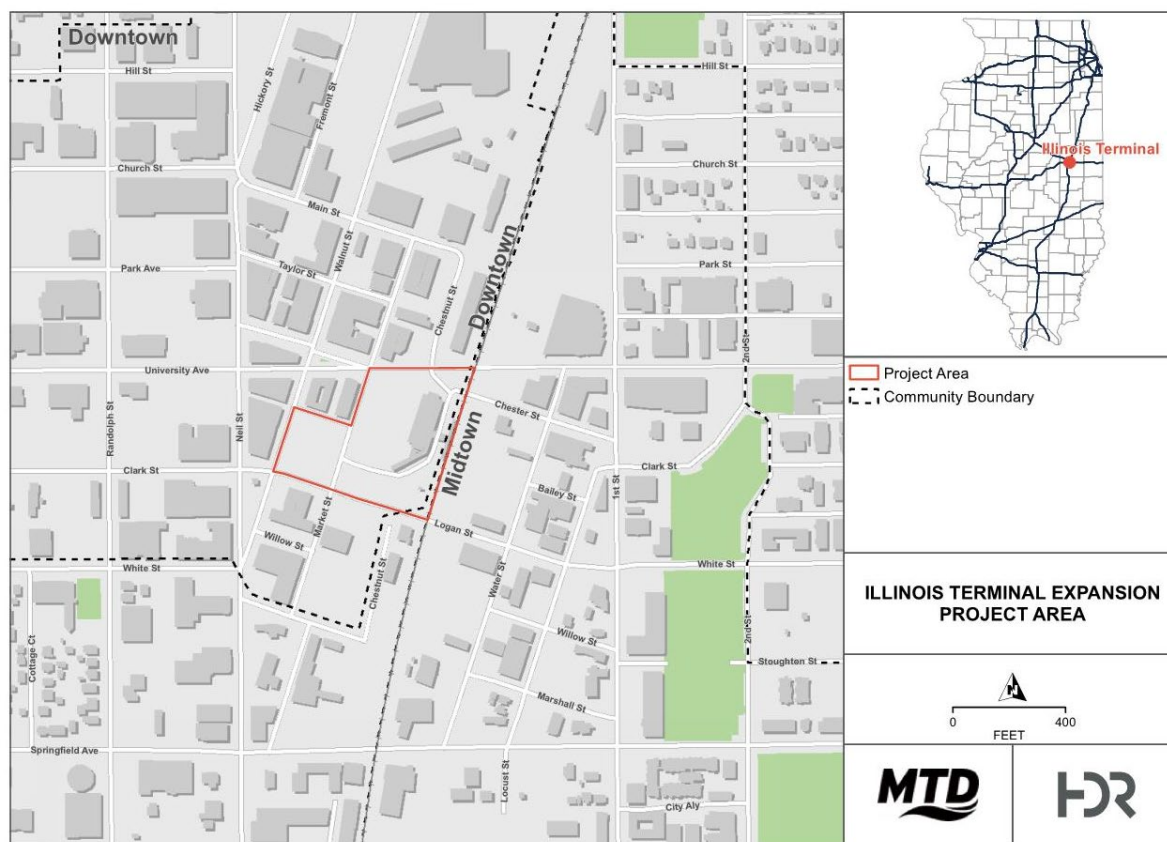
The mixed-use structure would be constructed with public and private funding. A portion of the mixed-use structure would be dedicated private residential units and retail space. Under the Joint Development project, FTA funding would potentially contribute to the site preparation, utilities, building foundations, walkways, pedestrian and bicycle access, streetscape improvements, safety and security equipment, and construction of the shell of the mixed-use structure, which would include space for commercial uses. Only private funding would be used to complete the interior build-out (or outfitting) of any private commercial or residential elements.

The area shown in Figure 1 is collectively referred to as “The Yards.” However, the area south of Logan Street, shown in grey, would be completed as a separate private project and is not included as part of the proposed Project evaluated in this EA. Information relating to potential future development south of Logan Street is included for informational purposes and to evaluate cumulative effects.

## 1.3. Project Location

Illinois Terminal is located at 45 East University Avenue in downtown Champaign, Illinois. The proposed Project limits are depicted on Figure 2 and defined by University Avenue to the north, the Canadian National (CN) railroad tracks to the east, Logan Street to the south, and Walnut Street to the west.

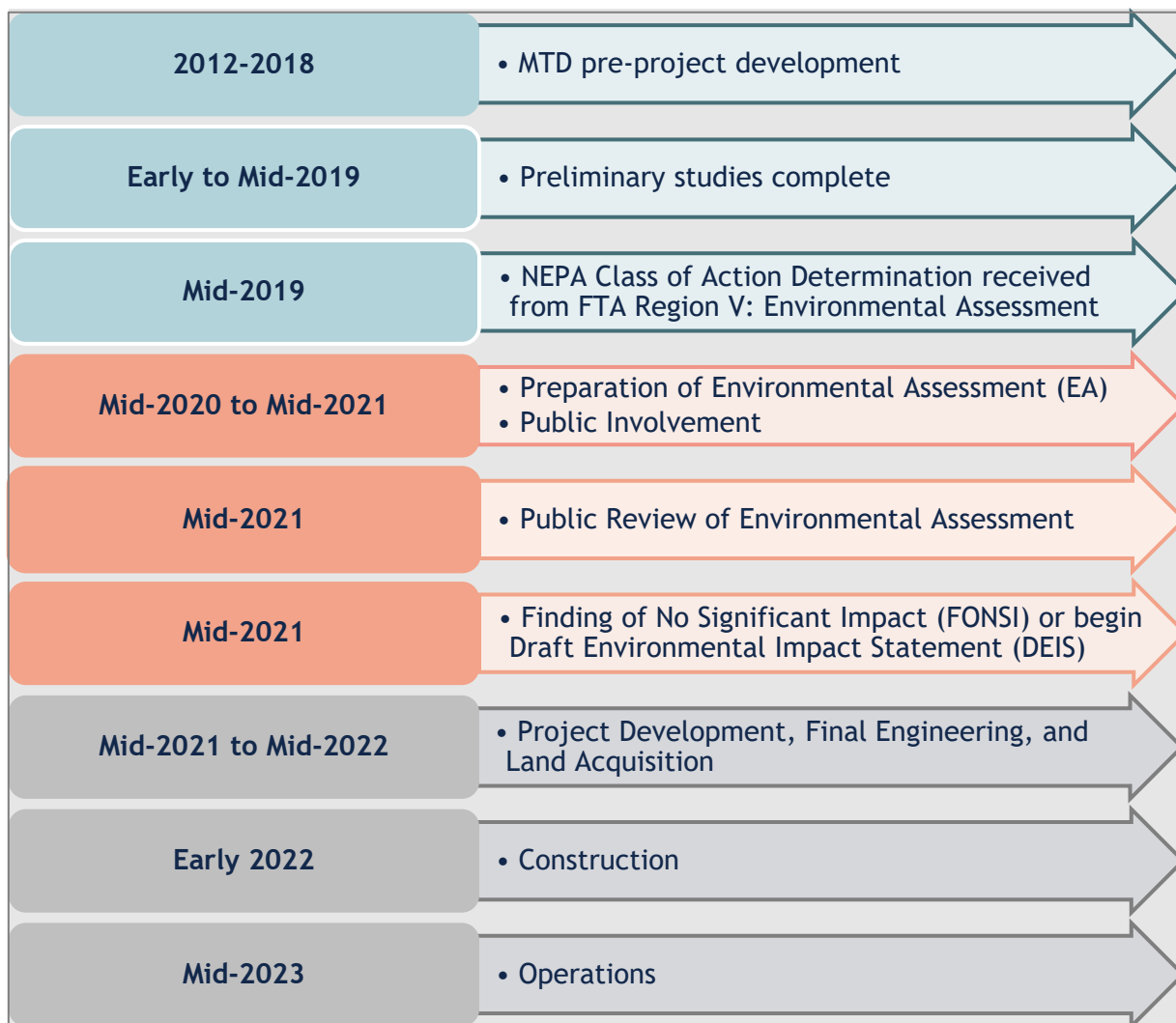
**Figure 2. Illinois Terminal Expansion Project Area**



## 1.4. Project Schedule

The feasibility of expanding Illinois Terminal was studied from 2012 to 2015 and resulted in a strategy to expand and accommodate future ridership and investment in the downtown area. The EA process began in mid-2020 and is anticipated to be completed in mid-2021. Construction is anticipated in early 2022, with operations to begin in mid-2023. The anticipated schedule is shown in Figure 3.

**Figure 3. Project Schedule**



## 1.5. Comments on the Environmental Assessment

Comments on this Environmental Assessment may be submitted in writing or made verbally by calling (217) 384-8188 during the public comment period. A Notice of Availability of the Environmental Assessment will be published in the News Gazette and on [www.mtd.org](http://www.mtd.org) on June 1, 2021. The Environmental Assessment and supporting documents will be available on the project website at [www.ITETheYards.com](http://www.ITETheYards.com). Hard copies will be available for review at the Customer Service desk at Illinois Terminal and at the Champaign Public Library located at 200 W. Green Street, Champaign, IL 61820. A self-paced online presentation will be posted at [www.ITETheYards.com](http://www.ITETheYards.com) to provide a summary of the Environmental Assessment.

**Comments must be received by July 1, 2021.**

Written comments should be sent to Jane Sullivan via email or US mail:

Email: [ITE@ITETheYards.com](mailto:ITE@ITETheYards.com)

US Mail: Champaign-Urbana Mass Transit District, 1101 E. University Ave., Urbana, Illinois 61802

## 1. Introduction

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Following the close of the comment period, FTA and MTD will consider the comments submitted. Based on the information contained in the Environmental Assessment and comments received, FTA will determine whether the proposed Project would have a significant effect on the human environment that would warrant preparation of an Environmental Impact Statement (EIS). If FTA decides that there are no significant effects, it will issue a Finding of No Significant Impact (FONSI). The determination will be made available to the public and all who submit comments on the EA.

The following person may be contacted for additional information regarding this proposed Project:

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1101 E. University Ave.  
Urbana, Illinois 61802  
217.384.8188  
[ITE@ITETheYards.com](mailto:ITE@ITETheYards.com)

## 2. Purpose and Need for the Illinois Terminal Expansion

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MTD is proposing to expand and improve its Illinois Terminal in downtown Champaign, Illinois (see Figure 1). Located at University Avenue and Market Street, Illinois Terminal is the primary intermodal transportation hub for the region, serving the cities of Champaign, Urbana, Savoy, surrounding rural areas, and the University of Illinois at Urbana-Champaign. Frequent public transit service connects Downtown Champaign, Midtown Champaign, and Campustown with daytime, evening, and weekend service.

### 2.1. Purpose of the Project

The purpose of the Project is to expand Illinois Terminal on parcels north of Logan Street in downtown Champaign. The Project would:

- Improve safety and accessibility for passengers by reducing platform congestion, controlling access to bus platforms, separating transportation modes, and increasing visibility.
- Increase the capacity of bus platform space, passenger waiting areas, and commercial space.
- Enhance quality of life by meeting demand for improved access to the community and region, providing efficient land use, increased transit use, and improved connectivity.
- Advance local economic development goals by capturing value associated with joint development.

### 2.2. Need for the Project

The Project is needed for the four key reasons described below.

#### Need #1: Safety Concerns for Transportation Operators and Passengers

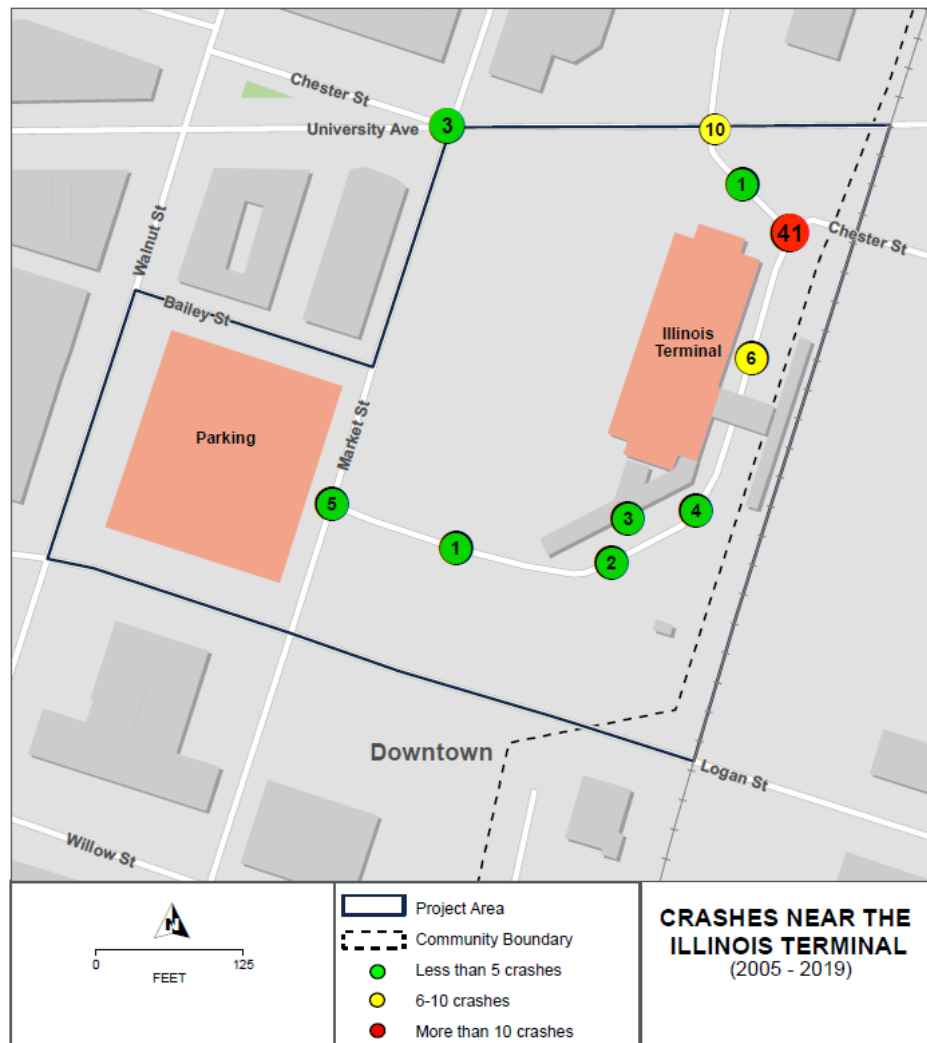
- Local, rural, and intercity bus service providers do not have dedicated platform space and must share MTD's 11 platforms, creating operational and safety challenges. These three transportation modes—local transit, intercity bus services, and rural transit providers—are constantly negotiating the insufficient platform space. Due to the shortage of bus platforms available at Illinois Terminal, some rural and intercity buses utilize other areas of the Terminal's campus, such as the interior parking lot, for boarding purposes; this puts pedestrians, bicyclists, commuters, and automobile occupants at risk.
- Currently, passengers walk in front of, behind, and in-between buses to board double-parked buses at non-platform locations. MTD employees often escort passengers between buses and across the driveway to enhance safety. Additionally, some passenger boarding takes place in parking lots and from curbs that are not designed for passenger boarding.
- Today, an area in the center of the main parking lot is dedicated for taxi cab pickup. There is currently no dedicated space for ride share, and these operators typically utilize any open space

## 2. PURPOSE AND NEED

in the main parking lot, reducing available parking and increasing congestion in front of the Terminal building.

- There have been 76 crashes in the past 15 years at Illinois Terminal as shown in Figure 4 (MTD 2020a). Four crashes involved bicyclists or pedestrians. The most common crash types are rooted in spatial limitations of Illinois Terminal, where two or more buses are serving the same platform, forcing buses to navigate the space around each other. Most of these crashes involve one bus passing another, the passing bus clipping the stationary bus or damaging the side mirrors.

**Figure 4. Crashes near the Illinois Terminal (2005 – 2019)**



### Need #2: Facility Capacity Limitations

- Since the opening of Illinois Terminal in 1999, the number of routes serving the facility has increased by 30% and peak utilization has grown by 50%.
- Illinois Terminal is currently operating beyond its design capacity of 11 buses, causing reliability issues such as schedule adherence and traffic obstruction. MTD makes universal transfers at



## 2. PURPOSE AND NEED

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key points during the day. Illinois Terminal currently manages up to 18 buses at a time, requiring riders to board double-parked buses in the parking lot and at existing platforms. Additionally, if a layover is necessary at this location, operators must drive around the block so that they are not blocking a platform. Based on projected 20-year growth rate, the facility will need to accommodate approximately 23 buses simultaneously.

- Passenger waiting facilities for MTD, Amtrak, intercity bus, and rural bus patrons in this location are insufficient for their current use. On typical Thursday, Friday, and Sunday evenings during University sessions, there are up to 300 people waiting in Amtrak's 1,962 square foot waiting area, which was designed for approximately 98 passengers. There is also an increase in passengers waiting for intercity buses on weekends and holidays, due to the high use by university students.
- Amtrak ridership at Illinois Terminal increased 4.2 percent from 172,877 passengers in 2015 to 180,427 passengers in 2019. The Long Range Transportation Plan (LRTP) goal is for a five percent increase in ridership by 2020 (CUUATS 2019). Due to the COVID-19 pandemic, public transit demand has been down across the country. Social distancing requirements were implemented and Amtrak service across the country has been reduced, all of which hampered Amtrak's ability to meet the 2020 goal. Preliminary ridership results for Amtrak Fiscal Year 2020 show a 38 percent decrease in annual ridership on the Illini/Saluki route from 2019 levels (Amtrak 2020). While it is unknown how long it will take for ridership to return to pre-pandemic levels, Amtrak service at Illinois Terminal will be restored to pre-pandemic service levels in May 2021 and Amtrak has implemented a number of on-board safety measures and ticket promotions to increase ridership, including buy one, get one free ticket sales. As ridership begins to recover, it is anticipated the Amtrak waiting areas will again be at, or over, capacity on weekends and holidays.
- Illinois Terminal is revenue-neutral, with rental incomes supporting the operation and maintenance of Illinois Terminal. Fully leased since opening, with no room for expansion. Current tenants include Amtrak, READY Program, a banquet facility and caterer, sandwich shop, and an Illinois State Senator's Office. READY Program is an alternative school serving students in the urbanized and rural area and has leased space at Illinois Terminal for 15 years. Approximately 50 READY students take MTD or rural services to school each day. The multimodal downtown location is ideal for the READY Program and it has requested additional space for classrooms, offices, restrooms, a multipurpose room, lockers, parking, and expanded kitchen space. There is no room for this educational program to grow within Illinois Terminal today.

### Need #3: Planning for Sustainable Growth and Development

- Champaign is one of the fastest growing cities in Illinois and the population of Champaign County is projected to increase by 15 percent by 2040 (CUUATS 2013).
- Total bus ridership at Illinois Terminal is expected to increase by 81,675 riders a year by 2036, or an increase of 4.2 percent (MTD 2019b).



## 2. PURPOSE AND NEED

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- Increased activity around Illinois Terminal associated with population growth has created heavy demand for transportation services. Resources accessible from Illinois Terminal using MTD fixed-route bus service include University of Illinois at Urbana-Champaign, 20 medical facilities, 16 parks, and other community resources such as YMCA, employment and training centers, and social security office.
- Approximately 85% of employment in the Champaign-Urbana area is accessible from Illinois Terminal using MTD fixed-route bus service.
- The transit dependent population within the City of Champaign, City of Urbana, and Village of Savoy has increased 1.8 percent between 2010 and 2018, with 15.9 percent of the population reporting no access to a vehicle (ACS 2018).
- Nearly 70% of MTD's ridership is composed of University of Illinois students, faculty, and staff. University of Illinois enrollment in 2020 was 52,000 students – the highest in the history of the university. In addition, there are more than 12,000 employees at the University (academic professionals, civil service, and faculty members). Most of these employees live within the MTD service area in Champaign, Urbana, or Savoy.
- The need for capital investment and opportunities for development is increasing, as evidenced by several recent developments within the MTD service area and the future proposed private development south of Logan Street.
- Illinois Terminal is surrounded by large swathes of under-utilized properties, including surface parking and dilapidated buildings, which are cut off from the rest of the downtown district by a high-traffic arterial road, University Avenue. City planning documents propose infill development to proactively promote redevelopment of surface parking lots, which would expand the core downtown district south of University Avenue. A multimodal facility co-located with commercial, residential, and mixed uses to expand the core downtown district to the south would result in efficient land use, economic development, increased transit use, and improved connectivity. This reduces the need for parking, reduces congestion, and improves safety, accessibility, and quality of life.

### Need #4: Local Economic Development Interest

- Since it opened in 1999, Illinois Terminal has been pivotal in creating a new direction for downtown Champaign and providing opportunity for nearby rural areas. It is located within the Downtown Tax Increment Financing (TIF) District and is adjacent to a federally designated Opportunity Zone. Illinois Terminal is within 1.2 miles of six additional Opportunity Zones.
- The Illinois Terminal Expansion Project is a joint development initiative between public and private entities, demonstrating shared risks and responsibilities. The Illinois Terminal Expansion Project leverages the private investment to increase value and improve the quality of life for the community.
- There is growing demand for retail, office space, and access to multimodal transportation, as identified in the regional comprehensive plan.

## 2. PURPOSE AND NEED

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- A City-owned surface parking lot at Illinois Terminal is used for paid public parking for all downtown patrons, including Illinois Terminal visitors, and is typically at capacity. As development continues, there will be greater demand for general parking in the Project Area, thereby requiring additional parking to support current and future Illinois Terminal users.

## 3. Alternatives

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This chapter summarizes the alternatives for the proposed Project. One Build Alternative and the No Build Alternative have been carried forward for evaluation in this EA.

MTD conducted a Pre-Project Development Study from 2012 to 2015 that resulted in the development of a phased expansion plan, documented in the 2015 Illinois Terminal Expansion Study. The expansion plan identified in the Illinois Terminal Expansion Study was reviewed by the City of Champaign City Council at public work sessions and resulted in the selection of a locally preferred Build Alternative. Preliminary studies to evaluate the feasibility of the project were conducted and discussed at four public work sessions attended by City Council, MTD staff, representatives from private developers, and members of the public. Six project goals were established to evaluate the transit investment and evaluate refinements to the locally preferred Build Alternative. These goals are consistent with the Purpose and Need identified in Chapter 2, and include:

- Increasing the use of transit and its efficiency and attractiveness for all users;
- Developing and selecting an implementable and community-supported project;
- Contributing to the improvement of regional equity, sustainability and quality of life;
- Improving sustainable travel options;
- Enhancing connectivity of the corridor to the regional transportation network;
- Supporting sustainable growth; and
- Improving public safety.

### 3.1. No Build Alternative

The No Build Alternative is a required alternative as part of the NEPA environmental analysis and is used for comparison purposes to assess the relative benefits and impacts of implementing the proposed Project. The No Build Alternative would not upgrade or expand Illinois Terminal nor would it allow MTD to leverage private investment to increase value and improve quality of life for the community. The No Build Alternative is identified as the “Business as Usual” scenario in the travel modeling and includes potential future private development south of Logan Street. Operational crowding of buses and passenger crowding on platforms and within the waiting areas would continue to increase as the community grows, development in the downtown area progresses, and demand for public transportation rises. Safety of passengers would continue to be a concern for MTD and users of Illinois Terminal as buses compete for platform space, queue on local streets, and load and unload passengers at non-platform areas in parking lots and at double-parked locations.

The No Build Alternative would not meet the needs for the Project.

### 3.2. Build Alternative

The proposed Project limits are depicted on Figure 2. The potential private development proposed south of Logan Street is not included in the Build Alternative but will be considered as part of the cumulative effects analysis in Section 4.17. The Build Alternative would renovate the Illinois Terminal building, expand the Illinois Terminal building (referred to as the mixed-use structure) on existing surface parking lots to the south and southwest, and reconfigure the site layout for better operations and safety.

As discussed in Section 1.2, the following physical elements would be included and are discussed in more detail as outlined below:

1. Expansion of bus platforms, including providing dedicated space for rural and intercity services;
2. Construction of controlled pedestrian access to bus platforms and visibility improvements;
3. Interior renovation and expansion of the Illinois Terminal and waiting areas;
4. Construction of a mixed-use structure that connects to Illinois Terminal and includes bus platforms, waiting areas, expanded area for leasable space, residential units, and a parking deck that supports these uses; and
5. Land acquisition.

#### 3.2.1. Expanded Platforms and Separation of Transportation Modes

The Build Alternative would create dedicated platforms for up to three rural and intercity vehicles along Market Street in front of the Illinois Terminal building, as shown in Figure 5. A bus bay would be created along Market Street to remove the buses from traffic; this would lower the number of crashes that are experienced on Market Street. Pedestrian crossings would be provided to allow for safe access across the circular drive to the rural and intercity platforms along Market Street and at Market Street and Bailey Street.

In addition to the three new rural and intercity bus platforms on Market Street, the Build Alternative would increase the number of platforms for dedicated MTD service from 10 to 19, with total capacity for 23 buses. The four existing platforms behind Illinois Terminal are able to accommodate five buses and would remain in their current configuration. Fifteen new dedicated MTD bus platforms would be constructed south of Illinois Terminal and north of Logan Street, shown in Figure 5. The new MTD platforms would be constructed on an existing surface parking lot and would be on the ground floor of a new mixed-use structure, discussed in detail in Section 3.2.4.

**Figure 5. Site Layout for First Floor of Illinois Terminal Expansion**



Source: Ratio Architects 2019

The majority of taxi and ride share service use at Illinois Terminal is by Amtrak rail passengers. The Build Alternative improves traffic circulation in front of Illinois Terminal by moving taxi and rideshare traffic to a dedicated space on the second floor of the mixed-use structure (Figure 6).

**Figure 6. Site Layout for Second Floor of Illinois Terminal Expansion**



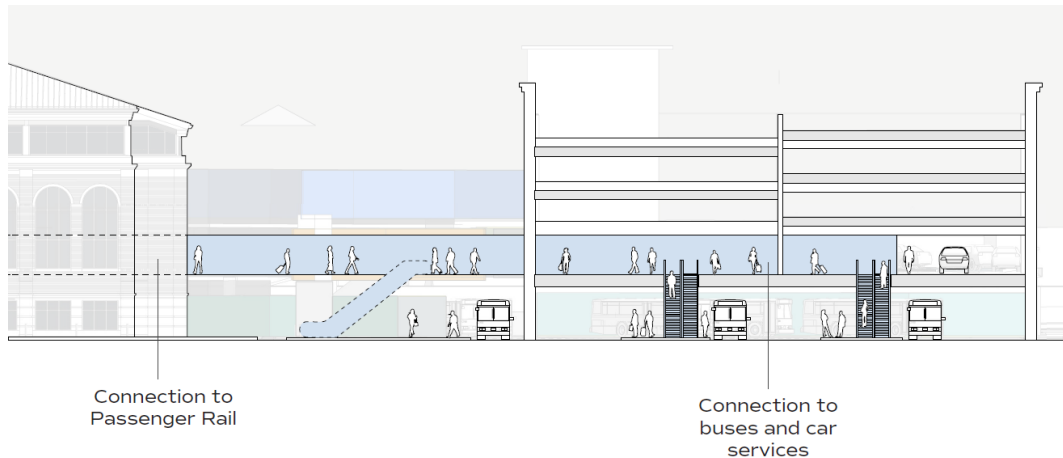
Source: Ratio Architects 2020

### 3.2.2. Pedestrian and Access Improvements

Highly visible crosswalks would be carefully positioned on the ground floor of the mixed-use structure for pedestrians crossing lanes of bus traffic to enter/exit island platforms (see Figure 5). Abundant lighting in the platform area would be implemented. Pedestrian-activated flashing beacons at the crosswalks would be incorporated as a design feature within the Project Area. Barriers would be installed on the back side of platforms, forcing passengers to utilize the crosswalk as it would be the only entrance/exit to the platform on the ground floor. These features would provide MTD bus operators with an improved ability to anticipate where the potential hazards might be while serving the Illinois Terminal platforms.

Illinois Terminal currently has an elevator and stairs to access floors 2 through 4, including Amtrak passenger rail. As shown in Figure 6 and Figure 7, second floor access would be provided to outer island platforms and rideshare/taxi pickup and drop-off. Vertical circulation elements (stairs and elevators) would facilitate access between Illinois Terminal and the new MTD platforms without the need to cross the bus drive (Figure 6). Escalators would also be installed near the Amtrak passenger rail connection (Figure 7). All improvements to Illinois Terminal and the mixed-use structure would be compliant with guidelines of the Americans with Disabilities Act of 1990. Universal design principals would be incorporated to the extent feasible.

**Figure 7. Second Floor Pedestrian Connections**



Source: Ratio Architects 2017

Note: Elevators not shown.

#### 3.2.3. Interior Renovation of the Existing Illinois Terminal and Waiting Areas

Under the Build Alternative, the interior of the Illinois Terminal would be renovated to accommodate connections to the mixed-use structure and platforms to the south, provide additional passenger waiting areas, and expand tenant spaces. The READY School space on the third floor, CityView Event and Meeting Center on the fourth floor, and other existing office space would be retained in their current configurations. The READY School space on the first and second floor of the Illinois Terminal would be moved to the third floor of the mixed-use structure. Renovations to the interior of the existing Illinois Terminal building would provide the following:

- Expansion of the Amtrak waiting room to accommodate more than 200 passengers;
- Up to 17,000 square feet in amenity and leasable space; and
- Up to 1,750 square feet of bus waiting areas to accommodate 115 passengers.



### 3.2.4. Mixed-Use Structure

The mixed-use structure would be constructed on three parcels located north of Logan Street between Walnut Street and the Canadian National railroad tracks. As a joint development structure, FTA funding would be used to construct the building shell, including the bus platforms, transit-serving passenger amenities, MTD tenant space, and parking. The interior build-out of private development space for retail and residential uses within the mixed-use structure would be privately funded as part of the joint development agreement. Interior build-out related to transit and transit-serving passenger amenities would utilize FTA funding.

East of Market Street, the mixed-use structure would be five floors and would include a parking deck with approximately 374 parking spaces for use by Illinois Terminal passengers and employees, the public, taxi and ride share services, and residents of the private development. See Figure 8 for the full site layout and Table 1 for a listing of conceptual-level programming.

It is anticipated that 195 spaces of the total 374 spaces in the mixed-use structure would be for transit and transit-supportive uses. Approximately 17 spaces would be marked as reserved for MTD and police parking, Zipcar, and taxi/ride share. Approximately 126 prepay visitor spaces would be available for transit riders, multi-day parking, visitors to Illinois Terminal, and the general public. The parking deck would be managed by the City of Champaign, similar to the existing West parking lot at Illinois Terminal. Multi-day parking would be controlled through check-in procedures at Illinois Terminal. Approximately 179 parking spaces will be allocated to residential use.

**Figure 8. Site Layout for Illinois Terminal Expansion**



**Table 1. Joint Development Mixed-Use Structure Conceptual Plan Programming**

Floor	Use	Floor Area (sq. ft.)
1	Transit Amenity	2,160
	Retail	18,650
	15 bus platforms	7,285
	MTD Common	550
	MTD Waiting	2,650
	Retail “Back of House” (storage and employee break rooms)	5,735
2	MTD (leasable space)	8,250
	MTD Common	4,150
	Taxi and Rideshare pickup/drop-off	2,800
	Residential*	27,000
3	MTD (leasable space - READY School)	8,650
	Parking**	34,000
	Residential*	27,000
4	Parking	40,000
	Residential *	27,000
5	Parking	40,000
	Residential *	27,000
6	Residential *	27,000
7	Residential *	27,000

\*The interior build-out of the private development would be funded separately from the Illinois Terminal Expansion Project

\*\*Parking space allocation is discussed in Section 4.2.3.



## 4. Environmental Resources, Impacts, and Mitigation Measures

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This chapter describes existing conditions and the impacts of both the No Build Alternative and the Build Alternative (construction and operations) described in Chapter 3. Sections 4.2 through 4.17 present the existing environmental setting conditions as it exists today, a description of the major considerations and laws or regulations governing the analysis, methods used for evaluating the environmental impacts, and anticipated temporary construction and permanent environmental impacts from the No Build and Build Alternatives. Where adverse impacts are noted, measures to avoid or minimize impacts are discussed.

To assess the direct and indirect impacts of the Build Alternative, an important distinction is made between the geographic areas that are analyzed. The **Project Area** is defined as the outermost boundary of where ground disturbance would occur and location where permanent infrastructure is proposed. The **Study Area** is a 0.25-mile buffer around the **Project Area** to determine direct impacts related to neighborhoods and community resources, socioeconomics, and environmental justice (EJ) and indirect effects. The **Area of Potential Effect (APE)** is a specific term used in cultural resource analysis to determine adverse effects on historic properties. It considers properties within a 0.25-mile radius of the Project Area that would have clear sightlines of the proposed Project.

The following environmental resource areas are addressed in this Chapter:

- Transportation
- Land Use
- Neighborhoods and Community Resources
- Land Acquisitions and Relocations
- Socioeconomics
- Environmental Justice (EJ)
- Visual Resources
- Cultural Resources
- Noise and Vibration
- Safety and Security
- Utilities
- Water Resources, Geology, and Soils
- Hazardous Materials
- Air Quality
- Threatened and Endangered Species
- Indirect and Cumulative Impact

### 4.1. Environmental Issue Areas Requiring No Further Evaluation

Based on agency and stakeholder coordination, database searches, site visits and analysis, the following resources were not found within the Project Area and are not further evaluated for the reasons below:

- Surface waters – No surface waters are present within the Project Area, therefore, there would be no impacts and further discussion will not be carried forward in this analysis.
- Floodplain Management under Executive Order (EO) 11988, Executive Order 13690, and U.S. DOT Order 5650.2, Floodplain Management and Protection – According to FEMA 17019C0426D, the Project Area is within Zone X, Area of Minimal Flood Hazard. There would be no impacts and further discussion will not be carried forward in this analysis.

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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- Wetlands under EO 11990 Protection of Wetlands of 1977 – There are no wetlands in the Project Area, therefore, there would be no impacts and further discussion will not be carried forward in this analysis.
- Navigable waterways under Section 10 of the Rivers and Harbors Act (RHA) of 1899 - There are no navigable waterways in the Project Area, therefore, there would be no impacts and further discussion will not be carried forward in this analysis.
- Coastal zones per the Coastal Zone Management Act (CZMA) of 1972. The Project Area is not within a coastal zone. There would be no impacts or potential conflict with the Coastal Zone Management Act, therefore, further discussion will not be carried forward in this analysis.
- Unique farmlands under the Farmland Protection Policy Act (FPPA) of 1981. The Project Area is a developed, urbanized area and no Prime or Unique farmlands are present. There would be no impacts or potential conflict with the Farmland Protection Policy Act, therefore, further discussion will not be carried forward in this analysis.
- Section 6(f) resources under the Land and Water Conservation Act (LWCA) of 1965 – There are no Section 6(f) resources in the Project Area, therefore, there would be no impacts and further discussion will not be carried forward in this analysis.

### 4.2. Transportation

This section summarizes the existing transportation system and the potential impacts of the proposed Project on the transportation system. For additional detail, see the Transportation Technical Memorandum attached as Appendix A.

#### 4.2.1. Legal/Regulatory Context and Methodology

MTD conducted a transportation analysis in compliance with current FTA guidelines, NEPA regulations (42 USC § 4321 et seq.), and the Fixing America's Surface Transportation Act (Pub. L. 114–94). MTD also reviewed local traffic studies and regional models to understand the existing transportation network and other planned or programmed projects in the Project Area. These resources included the Champaign-Urbana Urbanized Area Transportation Study (CUUATS) Long Range Transportation Plan 2045 and Sustainable Choices 2040, City of Champaign's transportation and community plans, and parking and traffic memoranda prepared for a larger development area that includes the proposed Project. In light of COVID-19 and atypical traffic levels, traffic data collected in 2019 and information from a 2019 Traffic Impact Analysis was used to complete a review of traffic impacts.

Using Champaign County Regional Planning Commission's (CCRPC) traffic projections, 2019 traffic and parking technical reports, and calculating anticipated demand, MTD assessed potential temporary and permanent impacts to the transportation system, including construction and permanent impacts to Illinois Terminal, transit service, traffic patterns, parking, and pedestrian and bicycle accessibility. An impact would be considered adverse if it resulted in permanent or temporary loss of parking spaces, reduced roadway capacity, increase in travel for motorized or non-motorized users, inability to access the Illinois Terminal, or a decrease in safety. In the event of an adverse impact, MTD identified

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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measures to minimize or mitigate impacts to meet the guidelines of the jurisdictional agencies' policies.

### 4.2.2. Existing Conditions

As the regional transportation hub, Illinois Terminal supports the following local, rural, and intercity bus service and Amtrak passenger rail service:

Fixed Route Services:

- MTD – 11 local routes
- Greyhound – 13 daily buses<sup>1</sup>
- Danville Mass Transit – 8 daily buses
- Peoria Charter – 14 daily buses<sup>1</sup>
- Champaign-County Area Rural Transit System (C-CARTS) – 4 daily buses
- Amtrak – 6 daily trains
- Burlington Trailways - 10 daily buses<sup>1</sup>

On-Demand Services:

- Piattran
- Burlington Trailways: Charter bus service
- C-CARTS

Within the Project Area, MTD operates 11 local routes, with weekday service hours at Illinois Terminal from 5:57 a.m. to 12:55 a.m. Saturday service hours at Illinois Terminal span from 6:07 a.m. to 12:55 a.m. and Sunday service hours from 8:52 a.m. to 12:41 a.m. Service frequencies vary by route and time of day.

### On-Site Circulation

Currently, buses enter the Illinois Terminal site from the north at the access drive from Chester Street, south of University Avenue. Bus circulation is clockwise around the building to exit the site at the access drive along Market Street. Bus platforms are located on the east and south sides of the Illinois Terminal building.

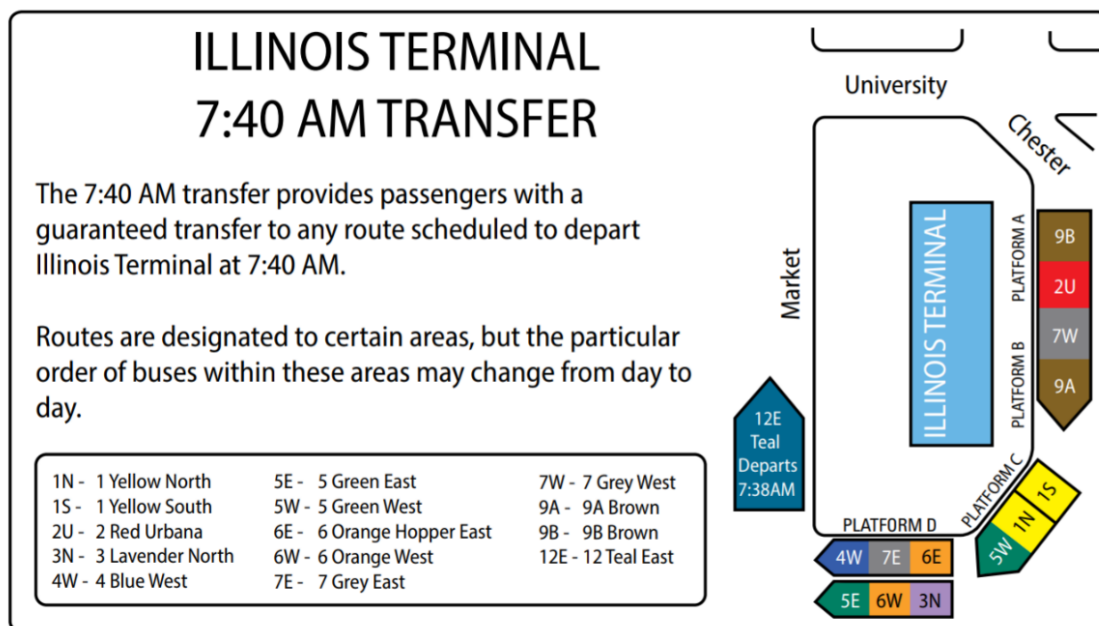
Illinois Terminal is currently operating over capacity. Illinois Terminal has 11 bus platforms (including one island platform with capacity for 1 bus) as originally constructed. Buses use the curb along Market Street and double-park at 3 platforms for additional space (see Figure 9). Since construction of the Terminal in 1999, the available platforms are also used by intercity buses and rural transit services, which add an additional 39 buses a day at Illinois Terminal.

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<sup>1</sup> Daily counts reflect pre-pandemic service levels. Service is expected to be restored to pre-pandemic levels as ridership returns.

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

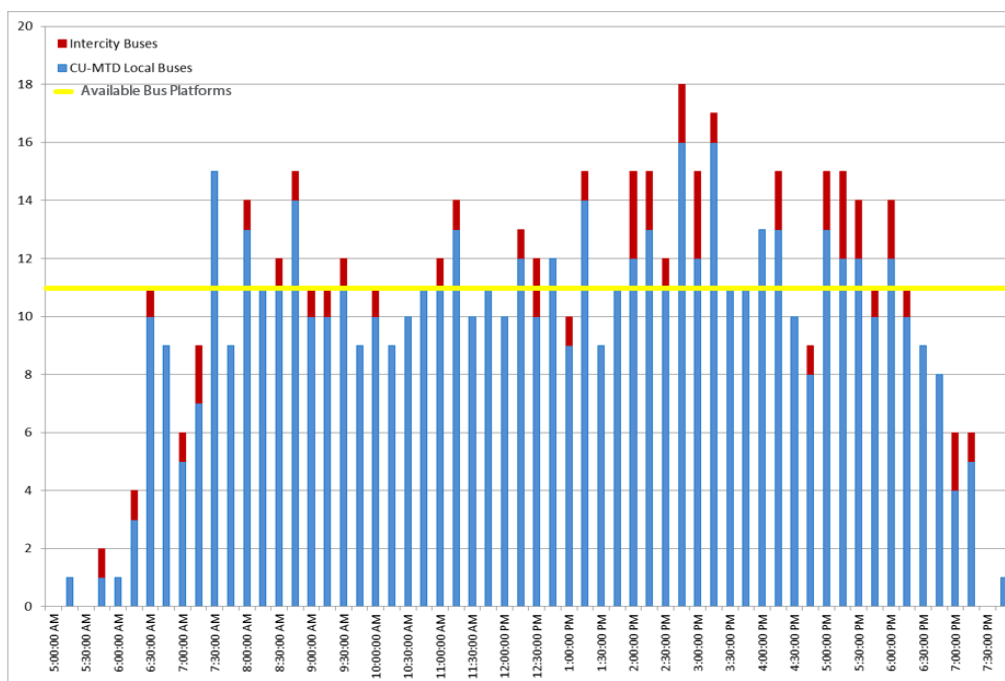
**Figure 9. Universal Transfer Platform and Driveway Utilization**



Source: MTD 2020

The result of the demand and limited space is that there are 23 fifteen-minute periods where the demand for a platform exceeds the 11 platforms provided, demonstrating that the existing facility is over capacity 46 percent of the time from 6:30 am to 7:00 pm. In addition, the demand for the current 11 platforms is either met or exceeded 70% of the time during the same time period. Figure 10 shows the number of buses at the Illinois Terminal during a typical weekday.

**Figure 10. Total Weekday Local and Intercity Buses at Illinois Terminal (15-Minute Intervals)**



## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

The result of this demand is congested bus staging where buses stack and block Chester Street and University Avenue, at times creating safety issues. From 2004 to 2019, there were 41 crashes at the bus entrance to the Illinois Terminal at its intersection with Chester Street involving MTD buses (See Figure 4). The over-capacity condition also forces transit riders to walk between or around buses in unmarked areas as shown in Photo 1.



**Photo 1. Passengers navigate through buses to board at non-platform locations.**

Illinois Terminal has a taxi stand that accommodates 8 taxis and is served by approximately 38 taxi companies. There is currently no dedicated space for ride share services, such as Uber and Lyft, so these operators typically utilize any open space in the parking lot in front of the Illinois Terminal (West Lot).

There are 64 bike spaces within the Illinois Terminal site, with 32 double sided racks located on the west side of the Illinois Terminal building, near a bicycle repair station. The remaining bicycle parking is located south of the building, near the canopy for the bus platforms. Bicyclists need to cross sidewalks or the parking lot when entering the site to get to the bicycle parking rack, increasing the likelihood of crashes with vehicles.

### Traffic

A traffic study was completed in August 2019 to estimate and analyze the potential traffic impacts of the proposed Project and potential future development by others south of Logan Street. Intersection operations are measured in accordance with the 2010 Highway Capacity Manual and reported as Level of Service (LOS) using a scale of LOS A (best) to LOS F (worst). LOS is a measurement of vehicle delay during typical weekday peak hours (morning and afternoon) that reflects the experience of the motorist. LOS C and better is considered acceptable. LOS D on arterial streets can be acceptable in more urbanized areas. According to the August 2019 traffic study, the City of Champaign considers LOS D during peak hours to be acceptable (Clark Dietz 2019). Based on the 2019 study, the existing LOS at the intersections surrounding Illinois Terminal of University Avenue at Market Street, University Avenue at Chestnut Street, and Logan Street at Market Street all operate at LOS B.

### Parking

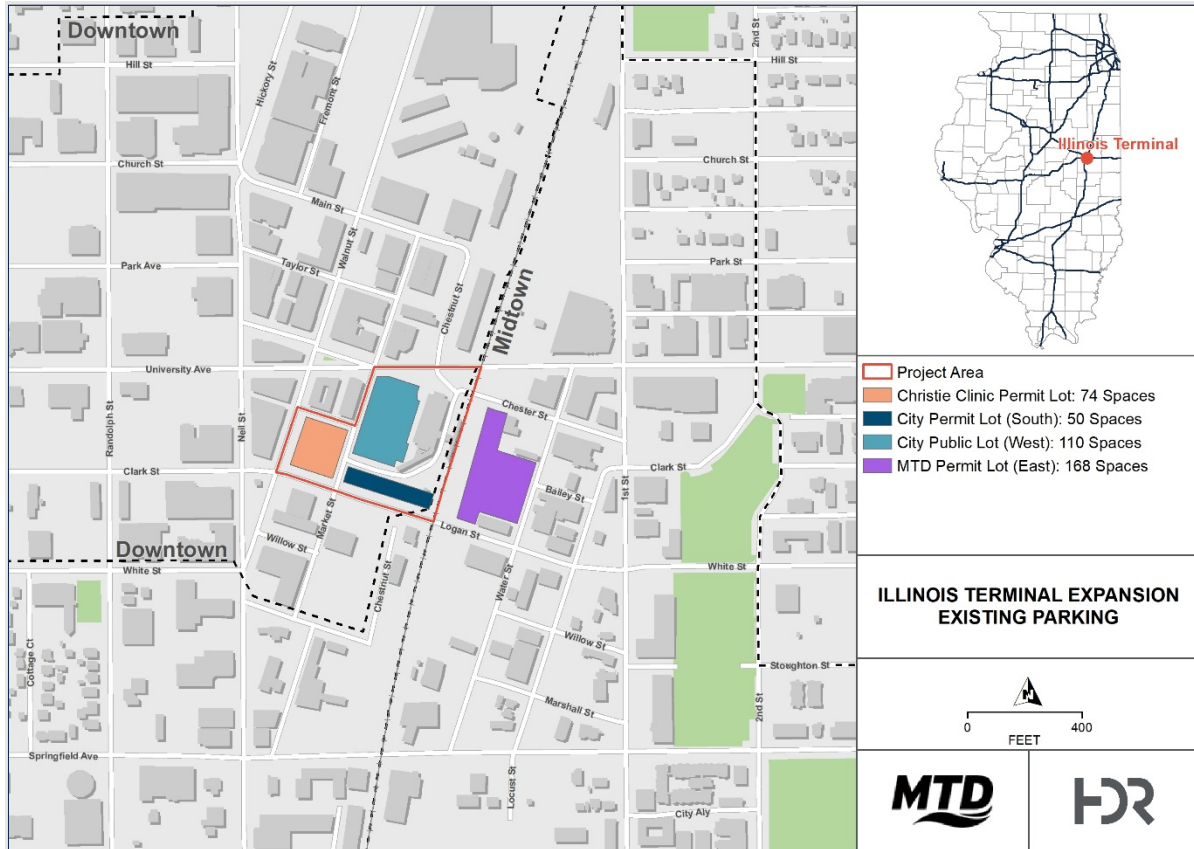
There are three parking lots in the Project Area and one MTD parking lot immediately adjacent to Illinois Terminal, as shown in Figure 11, and listed below.

- City of Champaign West parking lot. Located in front of Illinois Terminal, the West parking lot has 110 spaces and is near its capacity during typical weekdays. The West lot has spaces for prepay hourly and prepay multi-day public parking, ADA spaces, as well as reserved spaces for MTD, Zipcar, taxis, police, and the Subway sandwich shop.
- City of Champaign South parking lot. This lot is permit-only with 52 spaces. Permits are available to the general public through the City of Champaign and its employees. It is currently at 75 percent capacity.

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

- Christie Clinic. This is a privately owned, permit-only lot and is not available to the general public. It has 74 spaces for Christie Clinic employees and is considered at capacity.
- MTD East Lot. The East lot is outside of the Project Area but serves Illinois Terminal. It is a permit-only lot with 168 spaces used by Amtrak, Illinois Terminal tenants, MTD employees, and City of Champaign employees. It typically has available parking spaces during the day as confirmed by the MTD.

**Figure 11. Parking Lots within or adjacent to Project Area**



### 4.2.3. Environmental Impacts

As part of its long-range transportation plan model, CCRPC developed 2045 traffic projections for a “Business as Usual” scenario (No Build) and Preferred Scenario (includes the Build Alternative) for roadways adjacent to the Project Area. The proposed Illinois Terminal Expansion Project was considered in the Preferred Scenario by applying increased employment and households within the Illinois Terminal traffic analysis zone; however, no changes were applied to the street network. Table 2. summarizes the traffic volumes for the existing and two future conditions and provide the basis for the traffic analysis.



## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

**Table 2. Average Daily Traffic (ADT) Volumes**

Segment	2015	No-Build 2045	Build 2045
University Avenue from Neil Street to First Street	16,700	20,200	20,800
Walnut Street from Neil Street to University Avenue	7,500	9,000	9,500
Neil Street from Walnut Street to University Avenue	8,000	10,300	11,100
First Street from Springfield Avenue to University Avenue	5,600	6,500	6,700

### No Build Alternative

Under the No Build Alternative, neither additional bus or parking capacity would be added at Illinois Terminal. Safety improvements for pedestrians, vehicles, and buses would not be constructed. As the demand to provide service for a growing population increases, adding bus service and traffic to the Illinois Terminal site would constrain circulation and further reduce safety. Without additional platforms, more congestion on the surrounding street network would be expected as buses queue and traffic volumes increase. The increase in congestion would create a higher potential for crashes involving buses, especially at the high-crash intersection of Chester Street and the entrance to Illinois Terminal, as shown on Figure 4. Vehicle crashes between other vehicles and pedestrians would also be expected to increase. If space limitations to accommodate additional bus service and meet future demands is not addressed, existing safety concerns would continue. The transit system would become less reliable as buses navigate for space and dwell times increase.

### Build Alternative

#### *Permanent Impacts*

#### **Proposed Circulation**

The buses for the MTD and the other service providers would continue to enter the Illinois Terminal site from Chester Street and exit onto Market Street as they presently do. To access Illinois Terminal, pedestrians and bicyclists would continue to use the adjacent street sidewalk roadway and sidewalk system that includes designated crosswalks. Bike racks would continue to be provided adjacent to the Illinois Terminal building.

There are proposed improvements to the site that would benefit pedestrian, bicycle, and vehicular interaction. Safety barriers are proposed in the MTD bus loading area along the platforms to encourage pedestrians to cross at designated locations in the mixed-use facility. Crossing areas within the Project Area would be further enhanced with flashing pedestrian signage to alert buses of pedestrians crossing. Entrance and exit points for vehicles would be designed using appropriate standards and computer software so that vehicles remain in the roadway. Lastly, all pedestrian crosswalks would be designed with reflective material, making these areas more visible to vehicles on the roadway.

#### **Traffic**

Trips generated by the Illinois Terminal Expansion Project were developed from data provided by MTD, the Institute of Transportation Engineer's (ITE) Trip Generation Manual, and the portions of the 2019 traffic technical report that reference the Illinois Terminal Expansion Project. Table 3 identifies

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

the anticipated traffic generated by each of the Illinois Terminal Expansion Project components during the weekday PM Peak Hour.

**Table 3. Illinois Terminal Expansion Project Proposed Additional Traffic – Weekday PM Peak Hour**

Land Use	In	Out	Total
Illinois Terminal Building Expansion	35	45	80
Expanded Bus Service	14	14	28
Private Development North of Logan Street	170	119	289
Total	219	178	397

The August 2019 traffic study was performed for the City of Champaign for potential future private development located both north and south of Logan Street, and evaluated intersections surrounding Illinois Terminal. The traffic generated by the potential future private development is included in the 2045 Build Alternative. The 2019 traffic study concluded that all intersections would operate at an acceptable LOS C or D during the weekday PM Peak Hour in 2045, which is the anticipated peak period generator of traffic for Illinois Terminal. (As previously discussed, LOS D is allowable by the City of Champaign.) The Illinois Terminal traffic shown in Table 3 is calculated to be approximately 66% of the traffic from the 2019 traffic study. Since the traffic generated by the Illinois Terminal Expansion Project would be less than that of the larger development analyzed in the 2019 study, the adjacent roadway network would be able to accommodate the increase in traffic from the Illinois Terminal Expansion Project. See Appendix A, *Transportation Technical Memorandum*, for more details on the traffic analysis.

### *Market Street*

With the proposed parking garage entrance/exit on Walnut Street, these vehicles would not interact with either the bus traffic exiting onto Market Street or the intercity bus platform area on Market Street north of Bailey Street, which would reduce potential conflicts and crashes with buses. Pedestrian crosswalk enhancements are proposed at the Market Street/Bailey Street intersection, which would provide a safety benefit for pedestrians and bicyclists.

### *Bailey Street*

Bailey Street would continue to be open to all roadway users. The east leg at its intersection with Market Street would provide access into the Illinois Terminal pick-up/drop-off area adjacent to the building as it does today. With the parking lot adjacent to the Illinois Terminal removed, it is anticipated that less traffic would use the Bailey Street intersection with Market Street, further enhancing vehicle, pedestrian, and bicycle safety at the Illinois Terminal entrance.

There would be no permanent adverse impacts to the transportation network as a result of the Build Alternative.



## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

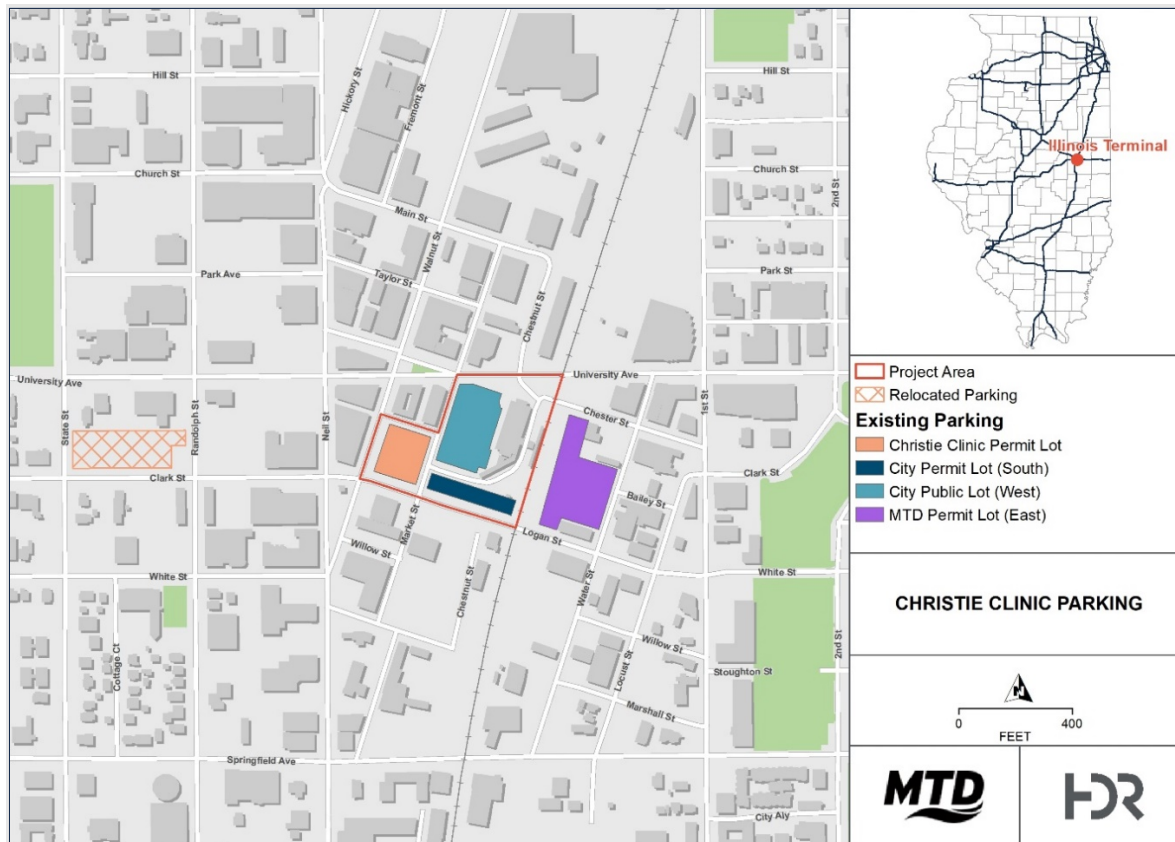
### Parking

#### *Parking Relocation*

The existing three parking lots that are within the Project Area (West, South and Christie Clinic) and the MTD East parking lot provide a total capacity of 402 parking spaces. Parking would be relocated as follows:

- City of Champaign West parking lot. The West lot would be repurposed and 106 of the 110 existing parking spaces would relocate to the parking deck in the proposed mixed-use structure. Details on the anticipated space allocations are provided below. The remaining four loading spaces would be maintained in the repurposed West lot area.
- City of Champaign South parking lot. The currently permitted spaces in the South lot would relocate to the parking deck. The eastern section of the mixed-use structure would be constructed on this lot.
- Christie Clinic. Vehicles in the Christie Clinic parking lot (74 spaces) would be relocated to a parking lot located two blocks west of the existing lot (see Figure 12) that would be purchased by Joint Development partner, Core Spaces. The western section of the mixed-use structure would be constructed on this lot.
- MTD East Lot. Amtrak parking (23 spaces) that is currently allocated in the East lot would move to the parking deck. There would be no ground disturbance, modifications, or parking capacity added to the MTD East parking lot as part of the proposed Project.

**Figure 12. Parking Lot Relocation**



## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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### *Parking Deck Space Allocations*

The proposed parking deck would include 374 parking spaces. Approximately 17 spaces would be reserved spaces for MTD, police, Zipcar, and taxi and ride-share services. It is anticipated that 126 transit-supportive spaces would be available any time, similar to the current availability at the existing West parking lot. Approximately 52 monthly permit spaces would be available to visitors to Illinois Terminal and the general public on evenings and weekends. The parking deck would include the following parking space allocations:

- Transit and transit-supportive spaces (195 spaces)
  - MTD/police short term: 9 spaces
  - Zipcar: 2 spaces
  - Taxi and ride share: 6 spaces
  - Illinois Terminal multi-day: 40 spaces
  - Public hourly: 74 spaces
  - Public permit: 52 spaces
  - ADA spaces at Illinois Terminal: 7
  - Illinois Terminal tenant: 5 spaces
- Residential (179 spaces)

Like the current operations of the West lot, the prepay hourly and multi-day public parking included in the parking deck would be managed by the City of Champaign. Spaces reserved for transit and residential uses would be marked and times of enforcement would be posted.

### *Construction Impacts*

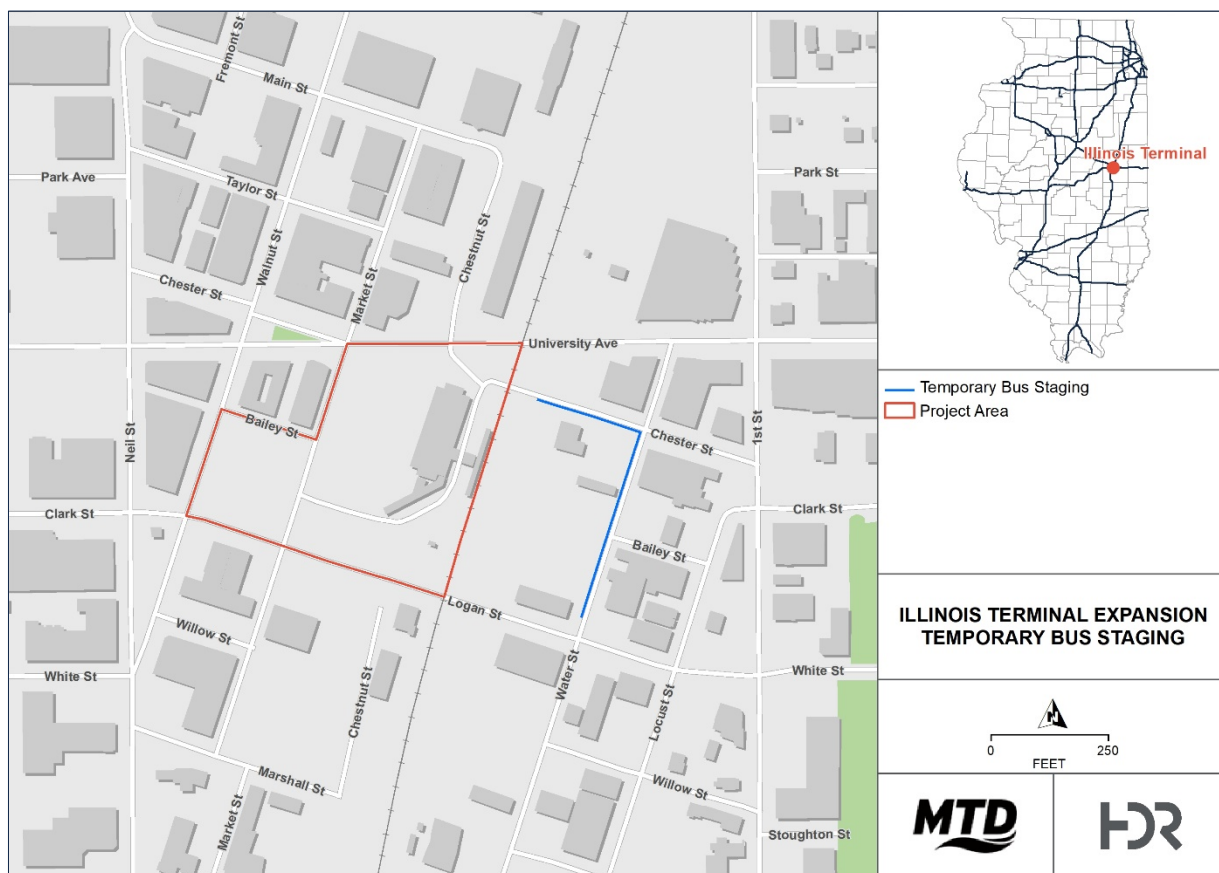
Construction of the Illinois Terminal expansion would cause temporary traffic impacts to the existing parking system, buses, and pedestrians.

### **Circulation**

During construction of the Illinois Terminal expansion, buses would be unable to circulate around the Illinois Terminal building until the parking structure is completed to a point where buses would be allowed to exit onto Market Street. During this time, temporary bus platform locations would be located along the south side of Chester Street between the railroad tracks and Water Street and along the west side of Water Street south of Chester Street. See Figure 13 for the location of temporary bus staging during construction.

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

Figure 13. Temporary Bus Staging during Construction



### Pedestrians and Bicyclists

Access to Illinois Terminal building would be maintained for non-motorized users during construction. Signage for pedestrians and bicyclists would be provided to help navigate through the construction area when construction staging disrupts the current route.

### Bailey Street Access

It is anticipated that Market Street would be closed between Logan Street and Bailey Street during a majority of the construction time. Access to Bailey Street would need to be maintained at all times, as buildings north of Bailey Street rely on it for access and emergency response. Construction documents will specify that staging operations on Bailey Street must provide at least 20-foot width to accommodate at least one-way traffic.

### Parking Impacts

The 52 parking spaces in the City of Champaign South lot would be unavailable during the construction of the proposed parking garage and relocated to nearby City owned parking lots and metered spaces. According to the 2019 parking survey, the City of Champaign's existing parking lots have the capacity to satisfy the parking demand during construction. Through careful construction planning and staging, the ADA parking space total would be maintained during construction in the

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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West parking lot until such time that the new ADA parking spaces are available in the new garage and are fully accessible. In addition, ADA parking spaces in the East lot are sufficient when buses are staged temporarily along Chester Street and Water Street.

### 4.2.4. Measures to Avoid or Minimize Harm

During construction, a phased approach would be used to minimize disruption to Illinois Terminal parking, transit providers, bicyclists, and pedestrians. For example, constructing the parking structure south of Illinois Terminal building before reconstructing the West parking lot into a drop-off loop drive would help to maintain adequate parking spaces during construction. The Contractor would be required to prepare a Construction Traffic Management Plan in coordination with MTD to identify construction phasing and associated circulation in the Project Area. Notifications to area businesses, residents, and patrons of the Illinois Terminal would occur before and during construction phases to minimize impacts experienced for daily users of the area. MTD and the contractor would coordinate with emergency response services, the City of Champaign, adjacent businesses, riders, and the general public about any detours, closures, or temporary parking impacts.

To address the circulation of the transit providers during construction, temporary bus platforms would be located along Chester Street and Water Street east of the Illinois Terminal. Impacts to parking during construction will be offset by the availability of nearby City parking lots. Purposefully planned construction staging would maintain ADA parking spaces during construction in the West parking lot until such time that the new ADA parking spaces are available in the new garage and are fully accessible. In addition, ADA parking spaces in the east lot are sufficient when buses are staged temporarily along Chester Street and Water Street.

Pedestrian and bicyclist impacts during construction will be mitigated through the use of guide signs directing them how to access the Illinois Terminal during different construction stages. Impacts to Bailey Street will be offset by providing at least one-way access during construction.

The Build Alternative would result in permanent transportation benefits by providing sufficient bus platforms to meet current and future demands. The provision of additional bus platform areas, additional bus bays, the separation of intercity buses from MTD buses, a dedicated area for taxi/rideshare companies, and a parking garage for patrons all have a positive impact on the safety of Illinois Terminal. These new amenities will greatly reduce conflicts between different motorized users and will also improve the safety for non-motorized users.

While traffic would operate at an acceptable LOS C or D during the weekday PM Peak Hour after construction, it is recommended that traffic signals be re-optimized after construction to assist with the additional and shifting traffic related to the proposed improvements to the Illinois Terminal.

## 4.3. Land Use Compatibility

This section reviews the compatibility of the proposed Project with existing and planned land uses, local planning goals and principles, and zoning regulations for the Project Area.

### 4.3.1. Legal/Regulatory Context and Methodology

CUUATS is the transportation entity of the Regional Planning Commission and the Metropolitan Planning Organization that defines regional planning principles. The City of Champaign regulates land

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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use planning, zoning regulations, and development review for the Project Area. MTD conducted an analysis to determine whether the proposed Project would cause adverse land use impacts. This analysis included review of existing land use plans, zoning maps, and desktop observations of the Project Area to determine consistency of the proposed Project with the goals and policies presented in the regional and local land use plans.

The following policy and regulatory documents and ordinances were reviewed:

- City of Champaign
  - 2006 Downtown Plan
  - 2011 Champaign Tomorrow Comprehensive Plan
  - 2016 Redevelopment Plan and Project Downtown Fringe TIF District
  - 2020 Code of Ordinances, Chapter 37 Zoning
- CUUATS
  - 2014 Long Range Transportation Plan: Sustainable Choices 2040

A land use impact could occur if the proposed Project is:

- Incompatible with surrounding land uses;
- Encourages land use and development inconsistent with local plans, goals, and objectives; or
- Inhibits allowable development that might otherwise have occurred.

### 4.3.2. Existing Conditions

#### Existing Land Use

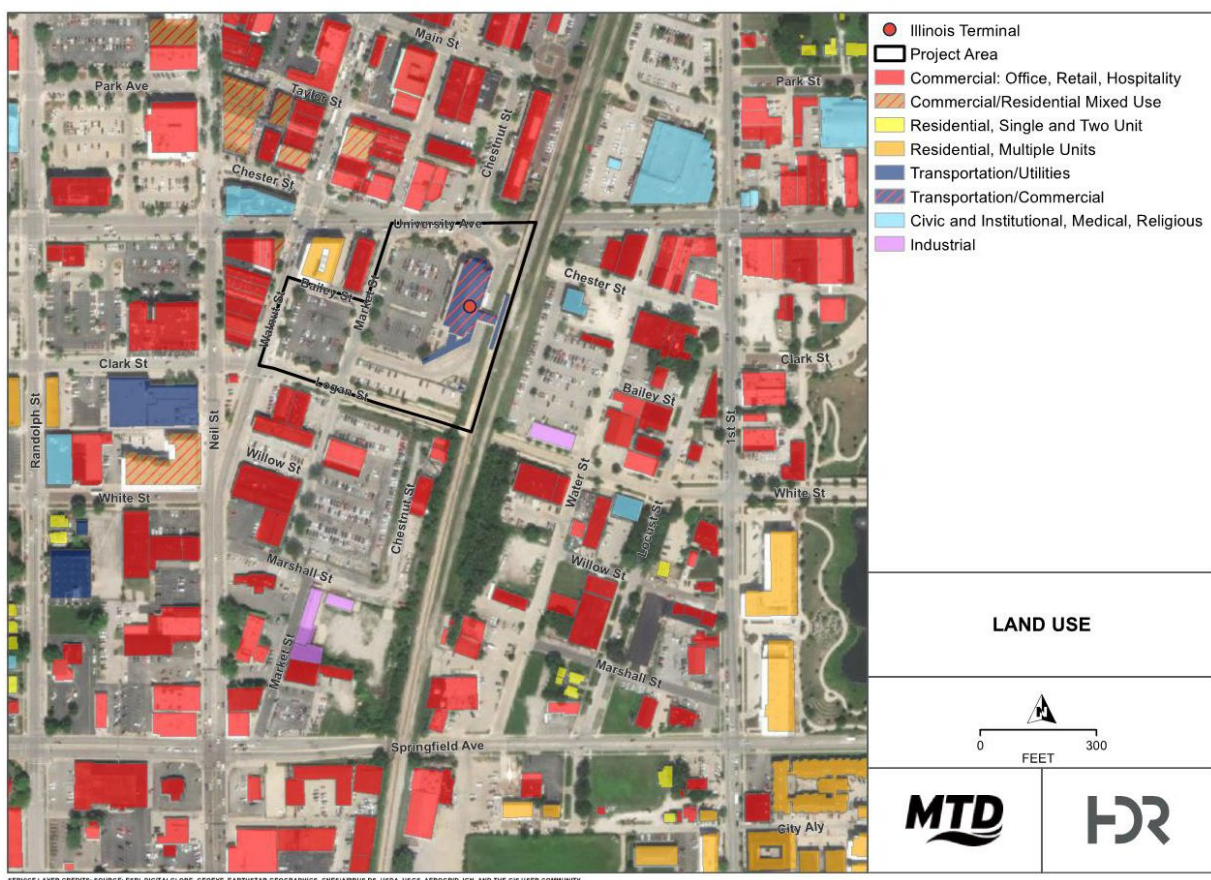
The location of the proposed Project is in downtown Champaign, in an area at the edge of the denser downtown core where surface parking lots have been a substantial part of the use in recent decades. Three of the four parcels that comprise the Project Area are currently used as surface parking lots. Uses on the blocks surrounding the Project Area are a mix of retail, residential, small industrial, civic, and office, operating in long-established older structures. On the north side of University Avenue, across from Illinois Terminal, there is a mix of restaurants, pubs, and boutique retail stores and personal service businesses in renovated industrial and commercial buildings, including a historic train station. Some of these buildings were designed with first floor commercial space and residential apartments on floors above. Figure 14 illustrates existing land use in the Project Area.

There are two properties on the southeast corner of Walnut and University that are immediately adjacent to the Project Area. The building at 16 East University is a six-story structure currently used for residential, providing apartments for seniors. The second property, at 41 East University, is the historic Illinois Traction Building, which is houses a mix of retail and office uses.



## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

Figure 14. Existing Land Use

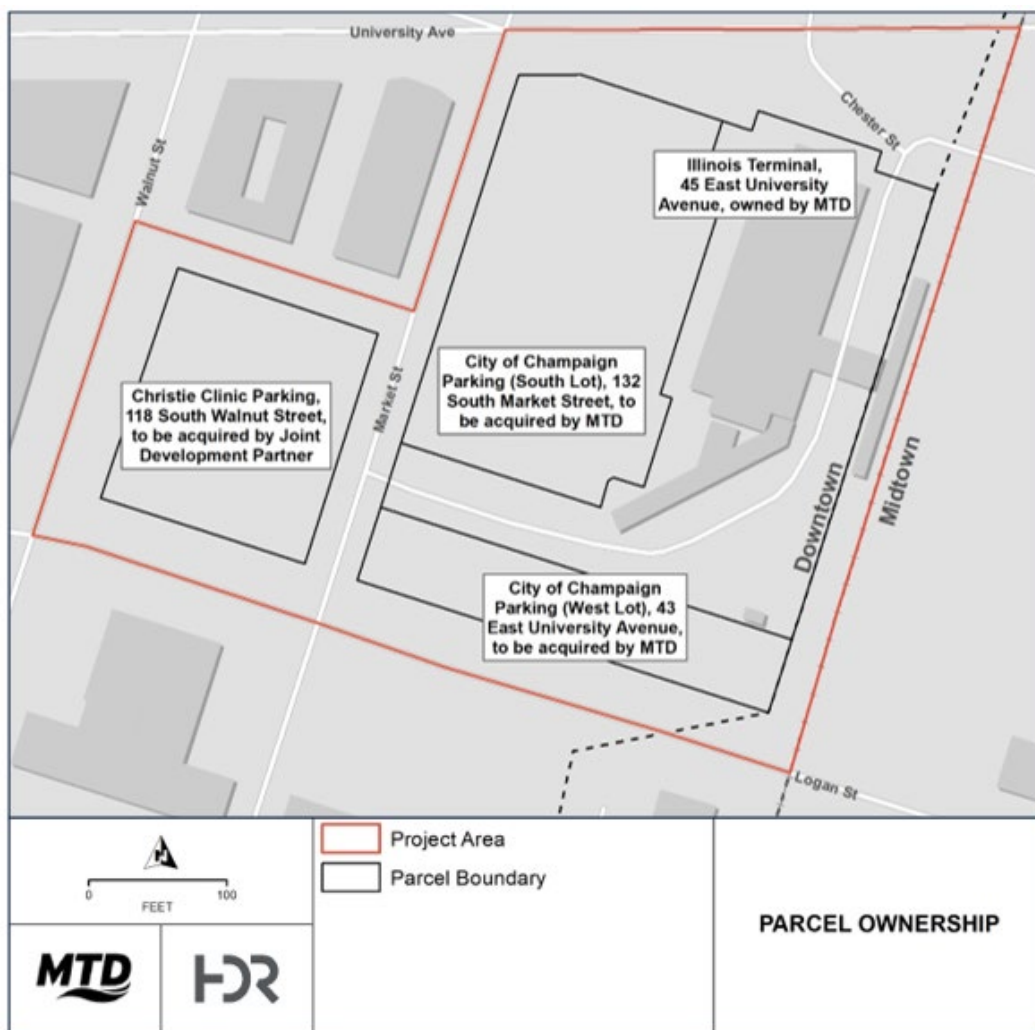


The four parcels that comprise the Project Area are described below and shown on Figure 15.

1. 118 South Walnut Street (APN 42-20-12-480-005) is a private parking lot reserved for use by a nearby medical clinic (one block to the west of the Project Area). This parcel is under contract for acquisition by the private joint development partner. This property forms a small block bounded by Walnut Street, Logan Street, Bailey Street, and Market Street.
2. 101-118 South Market Street (43 East University Avenue) (APN 42-20-12-448-008) is owned by the City of Champaign and used as a paid public parking lot in front of the Illinois Terminal.
3. 132 South Market Street (APN 42-20-12-484-010) is owned by the City of Champaign and used as a permit parking lot.
4. 45 East University Avenue (APN 42-20-12-484-009) is owned by MTD and includes the terminal building, which has a mix of retail, office, educational, and transportation in the interior space, and the busway and bus bays.

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

Figure 15. Parcel Ownership



The existing land uses within the Project Area are Illinois Terminal and surface parking. Providing transit access to the downtown area and transfers to MTD's service area, Illinois Terminal helps to reduce traffic volume and allows for a more compact and denser development pattern. It is also a gateway to the University of Illinois campus and is utilized by students making both daily trips to campus and longer journeys across the state and region on intercity buses and Amtrak. The Illinois Terminal building was designed with a waiting area for Amtrak passengers and other leasable space, some of which supports the needs of travelers with convenience food and other retail.

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

### Planned Land Use

The City of Champaign has land use planning and zoning jurisdiction over the Project Area and surrounding area. The 2011 Champaign Tomorrow Comprehensive Plan identifies Downtown, Campustown, and Midtown as the City's core. It notes that the core "flourishes with investment in infrastructure, infill development and coordinated leadership" and indicates that incentive programs will leverage public resources to spur a greater investment of private resources. The Build Alternative is consistent with the following goals in the Comprehensive Plan:

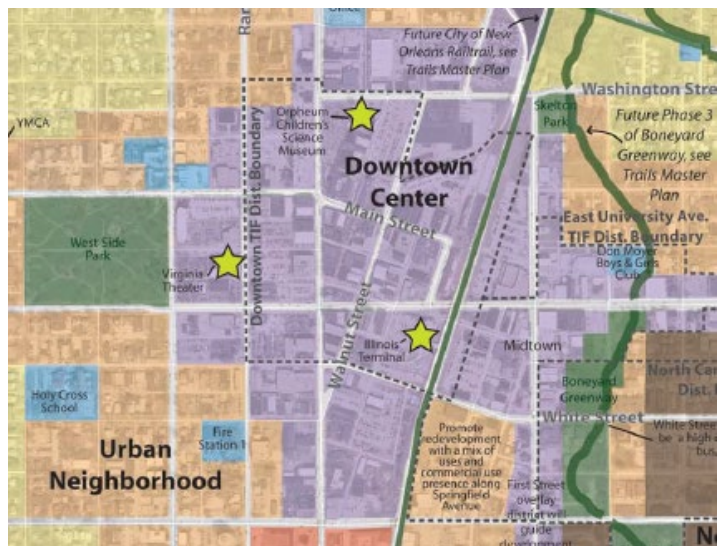
- Package and expand existing policies and programs that promote infill development.
- Reduce local greenhouse gas emissions through the reduction of vehicle miles traveled and the use of renewable energy and active transportation.
- [s]upport the local efforts... for high speed rail.

The future land use map in the comprehensive plan shows the Project Area as part of the 'Downtown Center' future land use category, shown in purple on Figure 16. The proposed Project is consistent with the land use plan for the downtown area, which includes infill development, high density with a vertical mix of residential and office uses above ground floor commercial uses, with emphasis on walkability and transit, pedestrian, and bicycle access.

The City of Champaign Downtown Plan (2006) includes numerous policies, guidelines, and goals that the Build Alternative supports, including the following:

- Create public open space in front of Illinois Terminal;
- Prioritize pedestrian safety and walkability for the transportation system Downtown;
- Implement action on intersections with the highest frequency of pedestrian/vehicular conflicts, including University Avenue and Market Street;
- Promote access to Downtown by modes other than automobiles;
- Increase use of transit;
- Develop taxi cab stands Downtown;
- Proactively promote redevelopment of surface parking lots; and
- Construct public parking structures in locations based on the future assumptions of growth and development and consider public/private ventures with large scale development projects for construction.

Figure 16. Downtown Future Land Use



Source: 2011 Champaign Tomorrow Comprehensive Plan



## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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The Project Area is within a City of Champaign Downtown Fringe TIF District and is consistent with the goals of the City's 2016 Redevelopment Plan and Project Downtown Fringe TIF District, which include:

- Providing for the implementation of economic development and redevelopment strategies that benefit the City and its residents;
- Encouraging positive and feasible redevelopment of underutilized facilities;
- Creating new jobs and retaining existing jobs for the City and area residents; and
- Providing public infrastructure improvements within the proposed redevelopment plan area to promote redevelopment efforts.

### Zoning

The Build Alternative is consistent with current zoning for the property under the City of Champaign's Code of Ordinances, Chapter 37 Zoning (2020). The Project Area parcels are currently zoned as Central Business Downtown District (CB2). Sec. 37.62.1 of the zoning ordinance says:

*The primary purpose of the Central Business Downtown District is to provide for high density retail, service, office, and hotel development along with housing, parking, and institutional uses. This district is most suitable for Champaign's downtown core. This District has high intensity uses in terms of scale of buildings, traffic that is generated, size of businesses, and hours of operation. This district is designed to accommodate all types of businesses as well as residents who wish to live in an urban environment. Due to its central location, diversity of transportation options, and the challenges parking requirements impose on urban development, this district allows individual property owners to determine the necessity of providing on-site parking. This district supports the continued growth of Downtown Champaign as a regional attraction with a strong public realm.*

The Build Alternative is consistent with the purpose of the CB2 district. The current land uses at Illinois Terminal and surface parking lots as well as the Project's proposed use for an expanded multimodal facility are permitted in this district. Permitted uses in the CB2 district include: freestanding parking structures, intermodal transportation facility, office, restaurant and retail uses.

The CB2 zoning also lists Provisional uses that the zoning may allow if the proposed Project has the approval of the City. A multifamily residential use would be Provisional and included as part of the private development in the mixed-use facility, subject to requirements of Section 37-264.3. The proposed Project, in its current iteration, is consistent with the Zoning Ordinances site development standards regarding building height, street frontage, setback, and site layout for parking and access. The minimum height in the CB2 is 20 feet and the maximum height is 115 feet, both of which are met by the Build Alternative. The proposed parking structure includes retail space fronting on the public street, in accordance with the requirements in the CB2 zone (Sec. 37-198.3) that prohibits ground level parking in front of the primary or secondary façade of a building.

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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### 4.3.3. Environmental Impacts

#### No Build Alternative

Under the No Build Alternative, the proposed Project would not be constructed and no impacts on current land use or zoning would occur. The CUUATS Long Range Transportation Plan (LRTP) includes the proposed Project as a priority infrastructure project in its fiscally constrained list of capital investments; Transportation Improvement Program FY 2019-2022 Updated May 31, 2019 includes the Illinois Terminal Expansion Project in its list. Also, the LRTP Sustainability Choices 2040 plan recognizes the Illinois Terminal Expansion as a vision/illustrative project. Therefore, by definition, the No Build Alternative would be inconsistent with the LRTP.

#### Build Alternative

##### *Alteration of Land Use Patterns*

##### **Permanent Impacts**

The Build Alternative would expand and reconfigure Illinois Terminal and would alter the current land use pattern. The main alteration of the current use is the replacement of surface parking with new infill development and open space. The Build Alternative is permitted and consistent with the City's land use plans and zoning. The Build Alternative is compatible with surrounding land use and supports allowable development. Therefore, the proposed Project would not result in an adverse land use impact.

##### **Construction Impacts**

Given the availability of space within the Project Area and proximate MTD properties that could be offered to the contractor for construction activities, staging, equipment, and materials storage, construction of the Build Alternative would not impact land use patterns during construction.

##### *Compatibility with Existing and Planned Land Uses*

##### **Permanent Impacts**

The proposed Project is fully consistent with existing and planned land uses.

##### **Construction Impacts**

The proposed Project could have some short-term impacts to existing businesses during construction, as some traffic and customers may avoid the area. No businesses or individuals would be displaced during construction because the proposed Project is primarily on property currently used for surface parking lots.

### 4.3.4. Measures to Avoid or Minimize Harm

The proposed Project has been coordinated with the City of Champaign following local development plans. No changes in zoning are necessary for the proposed Project. The residential component of the proposed Project is a provisional use that requires City approval. MTD and the contractor would work closely with the Downtown business community to communicate with the public about construction

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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zones, parking, and the maintenance of traffic plans to minimize the revenue impact on existing businesses.

### 4.4. Neighborhoods and Community Resources

This section discusses the proposed Project's impacts on the surrounding neighborhood, community, and businesses. The analysis considers the surrounding community character and cohesion; mobility; and community resources, such as schools, parks, and religious centers within the Study Area.

#### 4.4.1. Legal/Regulatory Context and Methodology

Following the U.S. DOT Community Impact Assessment Manual (U.S. DOT 1996), the analysis considers the following types of impacts of the proposed Project:

- Community Character and Cohesion – Impacts from commercial and residential displacements and changes in land use, visual/aesthetics, noise levels, and population/demographics. Community character includes attributes and features that make the community unique. Community cohesion is a quality of a geographic area where segmentation of the area would reduce its desirability to current and future residents.
- Mobility – Overall community impacts of changes in transportation options, station access, travel patterns, parking, physical barriers, and access for emergency service providers.
- Community Resources – Impacts on key facilities in the Study Area that play an important role in shaping and defining the community, such as landmarks, parks, community centers, and other places that serve as focal points or provide community services.

The community and business impact analysis involves creating demographic and community profiles and identifying key community resources within the Study Area (previously defined as a 0.25 mile buffer around the Project Area). Transit planners commonly use a 0.25mile radius to represent the distance that transit users are willing to walk to access a transit station. Key community resources include public facilities that fulfill a social function or provide services to a community, such as: schools, libraries, religious centers, emergency services providers, and recreational areas. Private facilities that provide services to a community, such as: private schools, hospitals, and nursing homes, may also be key community resources.

Impacts to businesses are evaluated by identifying commercial areas, existing multi-modal access, potential displacements, and potential impacts during and after construction. Mitigation measures are proposed to offset identified impacts, with an emphasis on community and transit-supportive solutions to address permanent and temporary construction impacts.

#### 4.4.2. Existing Conditions

The Study Area is in downtown Champaign, which features an urban environment that includes the following community resources, which are also depicted in Figure 17.

1. Illinois National Guard Recruiting Office
2. Boneyard Greenway
3. Daily Bread Soup Kitchen

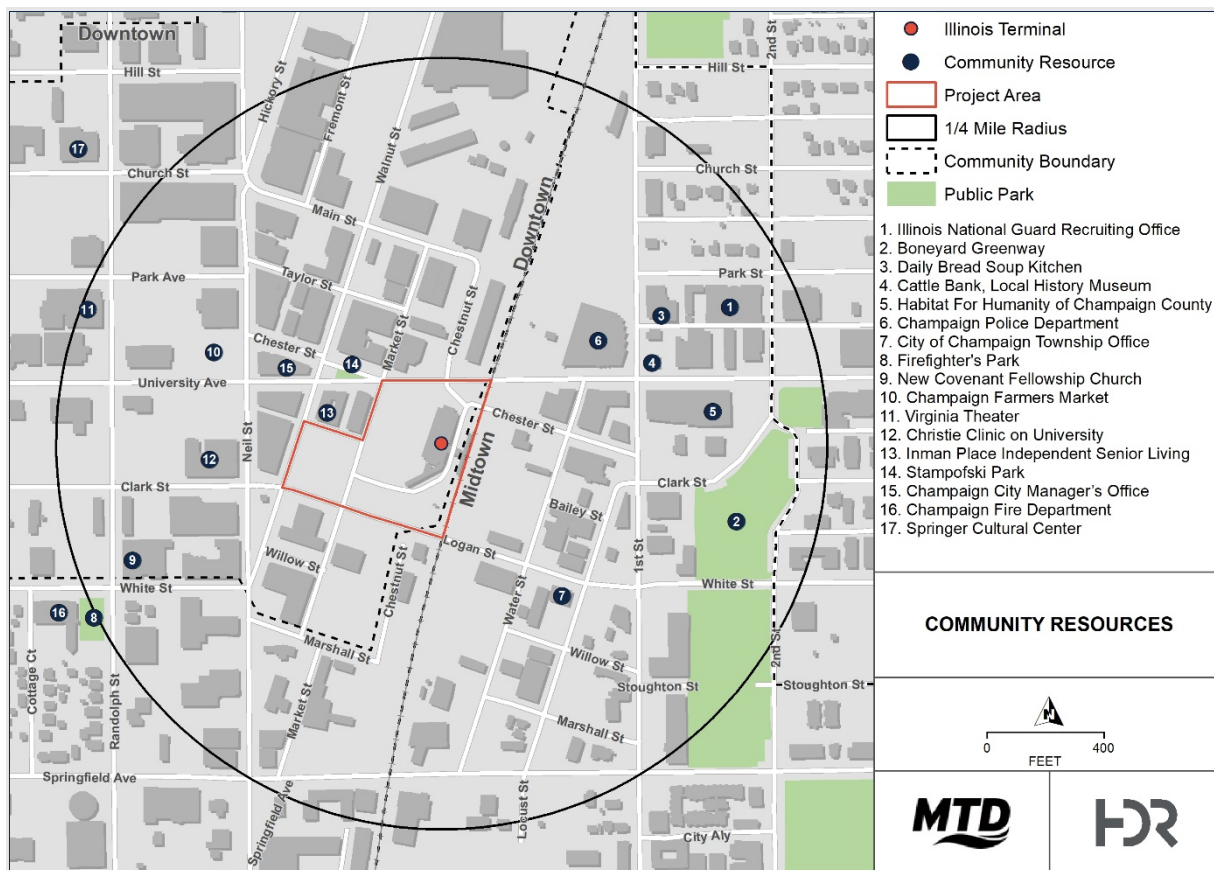
## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

4. Cattle Bank, Local History Museum
5. Habitat For Humanity of Champaign County
6. Champaign Police Department
7. City of Champaign Township Office
8. Firefighters Park
9. New Covenant Fellowship Church
10. Champaign Farmers Market
11. Virginia Theater, Performing arts center
12. Christie Clinic on University
13. Inman Place Independent Senior Living
14. Stampofski Park
15. Champaign City Manager's Office

Just outside of the 0.25-mile area are:

16. Champaign Fire Department
17. Springer Cultural Center

**Figure 17. Community Resources within 0.25 mile of the Project Area**



## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

Table 4 provides a community profile of the area within a 0.25mile radius of the Project Area, the City of Champaign, and Champaign County.

**Table 4. Community Profile for Champaign County and Study Area**

Parameter	Champaign County	City of Champaign	Block Groups within 0.25Mile of Project Area
Population 2018 (number of persons)	209,983	88,033	4,529
Households 2018 (number of households)	84,290	34,532	2,117
Employment 2018 (%) (employment/population ratio)	59.3	55.9	58.1
Minority 2018 (%)	25.1	38.9	46.3
Low Income (%)	36.7	37.2	33.5
Elderly 2018 (%)	11.9	11.2	4.0
Owner-Occupied Households 2018 (%)	54.2	45.3	11.8
Median Home Value 2018 (\$)	174,000	163,600	132,050
Average Household Size 2018 (number of persons)	2.31	2.33	2.02
Median Gross Rent per Month 2018 (\$)	815	884	913
Transit Dependent (%)	6.4	6.6	13.8
Average Commute Time 2018 (minutes)	17.8	15.0	16.1

Sources: U.S. Census Bureau 2018 ACS 1-Year Estimates and 2018 ACS 5-Year Estimates

### 4.4.3. Environmental Impacts

The following sections summarize the potential neighborhood and community impacts of the No Build and Build Alternative.

#### No Build Alternative

Under the No Build Alternative, no construction activities would occur and therefore, there would be no direct neighborhood, community, or business impacts. The benefits associated with increased accessibility to transit and improved regional connectivity would not be realized.

#### Build Alternative

##### *Permanent Impacts*

There would be no commercial or residential displacements as part of the Build Alternative. The Project Area is at the southern end of the urbanized downtown area and includes surface parking lots that would be converted to a mixed-use facility that would include 179 residential units, retail, and a parking deck.

The Build Alternative would not divide an existing community or interrupt community cohesion; rather it would extend the urban downtown core southward to encourage additional infill that would eventually create a walkable, cohesive connection to the Midtown neighborhood to the southwest which is shown as “Urban Neighborhood” in Figure 16.

No changes are proposed as part of the Project that would interfere with residents’ ability to interact, participate in local organizations, or access and use public facilities. The proposed Project would be constructed on existing surface parking lots and the relocation of the parking spaces to the parking

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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deck and nearby surface lot would not result in difficulty accessing and using public facilities. An increase in operational noise associated with the Build Alternative is not anticipated and the proposed Project would not interfere with the ability of residents to interact in the community.

The mixed-use structure is compatible with the existing environment because it is of a similar scale to the neighboring Inman Building and would be only a single floor taller. The new visual element would not substantially change the character of the community. The building's façade would be designed to be visually compatible with the surrounding community.

The Build Alternative would improve the safety and accessibility of Illinois Terminal by delivering controlled pedestrian access, visibility improvements, and separation of transportation modes. In addition, the Build Alternative would improve the quality of life by allowing local residents, rural populations, and visitors to more easily access existing and planned community resources. Rural transportation services will more easily bring passengers into downtown area, where they can utilize affordable transit to access healthcare, education, and employment needs, and patronize local businesses. Resources directly accessible from Illinois Terminal using MTD fixed-route bus service include 20 medical facilities, 16 parks, and other community resources such as YMCA, employment and training centers, and social security. All roads would remain open to traffic after construction and there would be no impact to emergency response providers.

There would be no change in access to the immediately adjacent senior living facility, businesses or any community facility within the Study Area. Public parking would be available in the parking deck within the mixed-use structure, at street meters, and at other nearby City-owned parking lots.

Proposed impacts on the community and region from the proposed Project would be beneficial because it would enhance the provision of reliable transportation to a wide range of residents utilizing public transportation to access jobs, healthcare, and recreational activities. Onsite wayfinding associated with the proposed Project would also more meaningfully connect Illinois Terminal with the surrounding community, making the transit system more accessible to new or inexperienced riders. Approximately 85% of jobs in the Champaign-Urbana community are accessible from Illinois Terminal via MTD fixed route services or rural transit fixed route services (Champaign County Economic Development Corporation 2018). Furthermore, 2018 census data indicates that 13.8% of households in the Project Area are zero-vehicle households. Approximately 4% of the Project Area's population are included in the senior population, with an age of 65 and above, and 7% of individuals have a disability (U.S. Census Bureau 2018). Seniors and disabled individuals are especially in need of access to a reliable transportation system and would benefit from improved access and reliability to the MTD system.

### *Construction Impacts*

Construction activities associated with the Build Alternative could result in temporary impacts on the surrounding neighborhoods, communities, and businesses, including intermittent noise, vibration, dust, utility disruptions, detours, altered access to some businesses, temporary transit platforms, reduced parking availability, visual and aesthetic changes from construction, changes in emergency vehicle routing, construction vehicle emissions, and increased truck traffic.

Construction would take place on the current Illinois Terminal parcel and properties acquired to accommodate the expanded site for the proposed Project. Temporary detours or road closures may



## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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occur but would have minimal impact on community resources because alternate routes would be provided in the immediate area to ensure access during construction.

### 4.4.4. Measures to Avoid or Minimize Harm

Before construction, MTD would develop a construction outreach plan to include specific techniques to communicate with neighborhoods and businesses to prepare for construction. Methods of communication about upcoming construction may include a Construction Update section on the Project website, email alerts, and/or social media posts. In addition to traffic, visual, noise, and vibration mitigation outlined in Sections 3.2, 3.4, 3.7, and 3.14, MTD would manage construction stages with the contractor to maintain access and provide alternate access to business, residential, and community facilities with temporary access changes during construction. During construction, the Project contractor would implement construction best management practices (BMP) to plan for the following:

- maintenance of access;
- traffic control;
- access to businesses in the construction area;
- erosion and dust control;
- maintenance of equipment; and
- noise and vibration.

MTD would work with local governments and emergency response providers to ensure safe mobility would be maintained within the Project Area, including reasonable traffic plans, safe pedestrian-friendly crossings, and accessibility to businesses.

## 4.5. Land Acquisitions and Relocations

This section describes the MTD expansion needed for the proposed Project, including acquisition of property.

### 4.5.1. Legal/Regulatory Context and Methodology

The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (“Uniform Act,” 42 USC § 4601, et seq.), mandates that relocation services and payments be made available to eligible residents, businesses, and nonprofit organizations displaced as a direct result of any project undertaken by a federal agency or with federal financial assistance. An impact is considered adverse under NEPA if housing, people, and businesses are displaced as a direct cause of the Project. The Illinois Code of Civil Procedure, 735 ILCS 30, Article 10, sets forth the procedure for acquiring property through eminent domain.

Under 49 CFR § 24.101(b)(2), real property acquisition requirements identified in the Uniform Act do not apply to acquisitions completed by an agency or its project partner when the agency or partner does not have authority to acquire property by eminent domain and it completes the following steps:

- (i) Prior to making an offer for the property, clearly advises the owner that it is unable to acquire the property if negotiations fail to result in an agreement; and
- (ii) Informs the owner in writing of what it believes to be the market value of the property.



## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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While no specific NEPA thresholds exist for assessing displacement impacts, compliance with the Uniform Act includes provisions for uniform and equitable treatment of persons displaced from their homes or businesses by establishing uniform and equitable land acquisition policies to address impacts.

### 4.5.2. Existing Conditions

The Build Alternative Project Area sits on four parcels. One of these parcels is currently owned by MTD, two are owned by the City of Champaign, and one is owned by Christie Management Company Inc. (see Figure 15). The three parcels that are not owned by MTD are currently being utilized as surface parking lots (see Figure 11).

### 4.5.3. Environmental Impacts

The following sections summarize the potential displacement and relocation impacts of the No Build and Build Alternatives.

#### No Build Alternative

The No Build Alternative would not result in acquisition or transfer of any properties.

#### Build Alternative

##### *Permanent Impacts*

Transfer of the City-owned properties to MTD will be completed through execution of an Intergovernmental Agreement. Acquisition of the Christie Management Company's surface parking lot would be completed by MTD's joint development partner, Core Spaces. The displaced parking from the acquisition of this parcel would be accommodated at a parking lot west of the Project Area, in coordination with the business owner (see Figure 12). MTD's joint development partner does not have eminent domain authority and the Uniform Act does not apply for the purchase of the Christie Clinic lot pursuant to 49 CFR § 24.101(b)(2). No housing, people, or businesses would be displaced as a result of the proposed Project and there would be no relocation of personal property.

##### *Construction Impacts*

During construction, MTD would offer the contractor existing MTD property for construction activities, staging, equipment, and materials storage. The exact area of each property needed for the Build Alternative would be determined as part of the engineering phase of the Project and may be adjusted based on the contractor's means and methods to construct the Project. But, no land is anticipated to be acquired, even temporarily, during construction.

### 4.5.4. Measures to Avoid or Minimize Harm

There would be no adverse impacts related to land acquisition; therefore, no avoidance, minimization, or mitigation measures would be required.

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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### 4.6. Economics

This section provides an overview of potential economic effects from the expansion of the Illinois Terminal, as proposed in the Build Alternative. A Benefit-Cost Analysis (BCA) is included in Appendix B and summarized here.

#### 4.6.1. Legal/Regulatory Context and Methodology

MTD conducted an analysis to determine whether the proposed Project would cause adverse impacts to economic development. FTA's draft *Guidelines for Preparing Environmental Assessments* (UMTA C 5620.1) and Environmental Resources Guidance identifies an economic development impact as one that could occur if the proposed Project causes:

- Direct or indirect taxation changes, or
- Substantial displacements of businesses and individuals, defined in this analysis as those of a magnitude that would preclude relocation in the immediate area because of a lack of available real estate, disruption of business activities, or impacts that would influence regional construction costs.

MTD and its joint development partner have completed several economic impact studies since 2015. In 2019, a BCA was prepared in support of the U.S. DOT BUILD grant application, using BCA standards set forth by the U.S. DOT Benefit-Cost Analysis Guidance for Discretionary Grant Programs. The capital costs of the Illinois Terminal compared to the quantified benefits for travel time savings for existing bus riders, cost benefits for new bus riders, reductions in crashes within the Project Area, and increased real estate property values were examined in the BCA. See Appendix B for additional information.

#### 4.6.2. Existing Conditions

The Project Area is within a City of Champaign Downtown Fringe TIF District and is consistent with the goals of the City's 2016 Redevelopment Plan and Project Downtown Fringe TIF District. The proposed Project will utilize TIF funds intended to support projects that improve market conditions, upgrade utilities and infrastructure, provide incentives for building renovations, and help prepare land for redevelopment.

MTD, as an agency, generates a direct annual economic benefit of approximately \$35 million and 432 jobs (TischlerBise 2015). Illinois Terminal itself is a revenue neutral facility with fully leased office space that pays for the facility's operational costs. The MTD's expansion and improvement of the transit center is especially important to the market within a half-mile radius of the Project Area because more than a quarter of the households do not own cars and another half have only one vehicle. The near balance of jobs and residents supports this low auto ownership, as residents can live and work within this geography.

The City of Champaign and Champaign County have a joint Enterprise Zone to promote job growth, spur reinvestment in declining areas, grow the tax base, and encourage infill development and reinvestment of existing building stock. Programs include Targeted Neighborhood Improvement, Affordable Multifamily Housing, Employment Expansion, Historic Structure Rehabilitation, and

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

Tourism Development. The most common and locally utilized incentives include sales tax exemption on building materials and property tax abatements.

The business mix in the downtown core is a mix of restaurants, entertainment, retail, services, and civic services. Approximately 55% of the businesses in the downtown and midtown areas surrounding the Project Area are restaurant and retail establishments. In 2016, restaurants and bars in the downtown core generated nearly \$37 million in food and beverage sales. Financial and real estate services and professional practices make up 16% of businesses and 12% are institutional uses. Most businesses in the immediate Project Area are locally owned. Vacancy rates in 2018 were less than 5% for office and retail space ready for tenants (Business Districts, Inc. 2018).

### 4.6.3. Environmental Impacts

#### No Build Alternative

The No Build Alternative would not facilitate economic growth in the region that is anticipated as a result of the development of improved transportation and would not adequately support transportation needs associated with private development planned in the downtown area.

#### Build Alternative

##### *Permanent Impacts*

The Build Alternative would include renovation of the existing terminal building, expansion of the facility with a connected mixed-use structure, front entrance improvements, green space, and expanded bus platforms. These transit-related elements would provide quantified value benefits of \$65.3 million from 2023 through 2042 through travel time savings for existing bus riders, cost benefits for new bus riders, reductions in injury crashes and property damage-only crashes within the Project Area, and increased real estate property value, as detailed in Table 5. The travel time savings with the Build Alternative is estimated to be 96,633 person-hours per year. Over a 20-year period, safety improvements would prevent 6 injuries and 95 property damage crashes.

**Table 5. Quantified Benefits of Build Alternative, 2023 to 2040**

Benefits	Value
Travel time savings for existing riders	\$11,738,873
General cost savings for induces riders	\$160,479
Safety benefits	\$309,435
Real Estate Property Value Creation (Office)	\$34,491,964
Real Estate Property Value Creation (Retail)	\$4,904,840
Residual Value	\$8,647,836
Total Benefits	\$65,251,059

The Build Alternative would transform existing underutilized properties that primarily consist of surface parking lots into a development that would generate new property tax revenue through new and expanded leases at the Illinois Terminal and the private development in the mixed-use structure. Because the privately-owned parcel would be acquired by the joint development partner and City-

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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owned parcels would be transferred to MTD ownership, no adverse changes in taxation policy or levels would occur as a result of the proposed Project.

The Build Alternative would not result in a permanent disruption of business activities, nor would it permanently affect regional construction costs. The Build Alternative could result in economic development opportunities, enhanced by potential redevelopment at adjacent sites. Potential redevelopment could create new, denser land uses near transit, consistent with zoning allowances and local plans. The Build Alternative would provide public and community benefits through improved access to existing amenities, improved regional mobility, and by supporting economic development in the downtown core. Land values could increase over current conditions due to the improved reliability and accessibility to transit service. New incremental property tax revenue would go towards the Downtown Fringe TIF fund. The Build Alternative is consistent with existing economic development and capital improvement plans that apply to the Project Area and surrounding area.

As development increases over a twenty-year period, the net positive impact increases. Infill development within the downtown core requires less capital infrastructure than new development outside the downtown area. The existing market and higher value multi-family housing units creates a positive net impact (City of Champaign 2010). Through a variety of reinvestment tools, downtown has experienced renewed interest and growth. Renovation of upper floors and new construction has brought housing back to downtown, reinforcing commerce in the area. Infill parcels surrounding downtown have potential to be urban neighborhoods, creating new housing choices.

The mixed-use structure would increase the economic competitiveness of downtown, with new apartments and enhanced access to transit bringing additional people and business to area establishments. A 2018 Downtown Champaign Mixed-use Development Market Potential and Existing Business Impact study (Appendix B) identified potential impacts of a mixed-use development on the local economy. The study identified a number of markets, including a pedestrian-oriented market, a 5-minute drive (10-minute bicycle ride) market, and a destination market. The study determined that while the existing market could support more restaurants and services in the downtown core, adding more employees and visitors would significantly improve the market. The 2018 study further emphasized the importance of high functioning transit and new construction to attract successful companies to the downtown core and spur additional housing, jobs and retail, which this project would facilitate.

### *Construction Impacts*

Construction would take place primarily within the Project footprint; however, there could be temporary disruptions to businesses and properties in the surrounding blocks. This could be due to road detours, sidewalk closures, intermittent noise disturbance and dust conditions; these types of disruptions could have a temporary negative revenue impact on existing businesses.

The proposed Project would create construction jobs during the one-year construction period. Indirect job growth would also be created across sectors supporting construction, including trade, architectural, truck transportation, and restaurants in the area. The average annual compensation for all jobs created during the construction period is project to be \$46,700 (Friedman 2019)

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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### 4.6.4. Measures to Avoid or Minimize Harm

Working closely with the downtown business community will be critical to minimizing the revenue impact on existing businesses during construction. Before construction, MTD would develop a construction outreach plan to include specific techniques to communicate with neighborhoods and businesses to prepare for construction. Methods of communication about upcoming construction may include a Construction Update section on the Project website, email alerts, and/or social media posts.

### 4.7. Visual Resources and Aesthetics

This section discusses the physical improvements of the proposed Project that would result in changes to the surrounding visual environment within the Project Area.

#### 4.7.1. Legal/Regulatory Context and Methodology

NEPA requires federal agencies to examine the impacts of federal actions on visual resources. In addition, Section 106 of the National Historic Preservation Act of 1966 (NHPA), 16 USC Section § 470(f) requires that federal agencies take into consideration the effects on historic properties. Section 4(f) of the U.S. Department of Transportation Act of 1966 require that visual impacts be considered to protect public and private historical sites, public parks, recreational areas and wildlife and waterfowl refuges. 36 CFR § 60.3(d) and 23 CFR Part 138.

For the purposes of this analysis, MTD assessed visual and aesthetic impacts first by identifying the Project Area's visual resources, including sensitive views, categories of potential viewers of both existing and potential future visual resources, and any Project-related changes to important visual features.

Visual resources are prominent features such as parks and open spaces; landmark structures or districts; and natural resources such as vegetation, wetlands and other natural features within the proposed Project Area. Such resources define the overall visual quality of an area and the context for determining potential visual impacts of a proposed project. The evaluation focuses on whether and how the proposed Project Area's visual quality would be altered with the proposed Project and whether any anticipated change would be generally positive or would degrade the existing essential visual character or context of the surrounding community areas.

NEPA does not identify thresholds for visual impacts. For the purposes of this analysis, an impact would be adverse if it resulted in one of more of the following:

- A substantial change in the community's visual character that would degrade the existing visual character or quality of a site and its surroundings;
- A major incompatibility with the context or character of the area (that is, a project feature would contrast strongly with its surroundings);
- Incompatibility with community goals; or
- Extensive remodeling of buildings or their surrounding area that are not compatible with the character of the area.

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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Information for this evaluation was drawn from aerial photographs, Google Earth, photographs of the proposed Project Area, field observation, and applications filed for National Register of Historic Places (NRHP) and Historic Landmark Districts (Appendix C). The visual impacts of any Project-related changes were compared to the existing terrain and viewshed to determine if mitigation should be proposed. Mitigation measures are identified where it is determined that adverse visual impacts would be likely.

### 4.7.2. Existing Conditions

The Illinois Terminal opened in 1999 in the center of downtown Champaign. This transportation hub features indoor and outdoor passenger waiting areas, as well as commercial space. There is onsite parking, as well as bus platforms outside of the building. The landscape is urban with a small, treed and landscaped area to the north. The Illinois Terminal Building, parking lots, and bus platforms characterize the Project Area. Surface parking lots and small industrial buildings are located to the south and an urban downtown core is located to the north and east.

Two NRHP listed properties are identified adjacent to the north and west, and ten additional buildings and a historic Landmark District are within the APE, as described in Section 4.8.

### 4.7.3. Environmental Impacts

#### No Build Alternative

As the No Build Alternative would not result in changes to the Project Area's visual resources or quality, there would be no visual impacts in the future without the proposed Project.

#### Build Alternative

##### *Permanent Impacts*

Elements of the proposed Project that would alter the visual environment include new bus platforms on Market Street, green space in front of the Illinois Terminal Facility, and the seven-story mixed-use structure. The proposed improvements are in context with the overall area and would not result in: 1) a substantial change in the community's visual character that would degrade the existing visual character or quality of the site and its surroundings, or; 2) a major incompatibility with the context or character of the area. The proposed Project is compatible with community goals of infill development, higher density, and additional green space, and the mixed-use structure is compatible with the urban character of the area .

Visual representations of the height and massing of the proposed Project elements (mixed-use structure and new bus shelters on Market Street) are shown in blue in Figure 18 and Figure 19. The conceptual designs are for illustrative purposes only and do not represent final designs of the new structure or façade.



## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

**Figure 18. View from University Avenue Looking South**

*Conceptual drawing for illustrative purposes only, does not represent final design or façade of mixed-use structure*



Source: Ratio 2020

**Figure 19. View from Walnut Street and Logan Street, Looking North**

*Conceptual drawing for illustrative purposes only, does not represent final design*



Source: Ratio 2020

The Build Alternative may block or alter views to the south from adjacent viewers to the west and north. The visual changes would be most perceivable to the residents of the Inman Place, as the location is directly adjacent to the Project Area. However, because the proposed Project is an



## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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expansion of existing transit infrastructure, the overall visual character and atmosphere of the Project Area would remain largely the same. The most visible element of the proposed Project is the seven-story mixed-use structure, which would introduce a new residential use within the Project Area, consistent with community goals of infill development. The mixed-use structure would be constructed according to the City of Champaign's zoning standards and may include landscaping; lighting; and/or using building construction materials, colors, and architectural styles consistent with Project surroundings. MTD would coordinate directly with Inman Place administration about the proposed Project. Visual impacts to historic properties are discussed in Section 4.8.

### *Construction Impacts*

Construction of the proposed Project would result in temporary impacts on the surrounding visual environment because of construction work zones and equipment. Construction would primarily take place within the existing Illinois Terminal Building, on property acquired for the proposed Project, or on temporary construction easements immediately adjacent to the Project Area. Construction would be for a limited duration.

### **4.7.4. Measures to Avoid or Minimize Harm**

The proposed Project would not result in permanent adverse impacts to the visual character or aesthetics of the area; therefore, no avoidance, minimization, or mitigation measures would be required.

## **4.8. Cultural Resources**

This section provides an overview of the potential cultural resources effects of the Illinois Terminal as proposed in the Build Alternative. More information can be found in the *Architectural Resources Investigation for the Illinois Terminal Expansion Project* in Appendix C.

### **4.8.1. Legal/Regulatory Context and Methodology**

The NHPA requires federal agencies to examine the impacts of federal actions on cultural resources (54 USC § 300101 et seq.). As the lead federal agency for the Project, the FTA has determined that the proposed Project will be a federal undertaking as defined in 36 CFR Part § 800.16(y), and that it is a type of activity that has the potential to cause effects on historic properties. Therefore, Section 106 of the NHPA of 1966 54 USC § 306108, applies.

A reconnaissance-level survey and NRHP eligibility evaluation of architectural resources (buildings, structures, districts, and objects) that are 45 years old or older (constructed in 1975 or earlier) within the APE was conducted. In accordance with the procedures related to the identification of historic properties described in the implementing regulations at 36 CFR Part 800, FTA determined the APE for the proposed Project, which is generally a 0.25-mile radius around the Project Area. During the field survey, the initial APE was reduced in certain areas because the proposed Project would not be visible from a particular area.

Prior to fieldwork, initial background research was conducted through the state's Historic and Architectural Resources Geographical Information System (HARGIS) to compile a list of previously identified historic properties within a 0.25-mile radius of the Project. To ascertain the presence of locally designated landmarks, the City of Champaign's Planning and Development Department list of

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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local landmarks was also consulted. Historic aerial photographs made available online by the City of Champaign were then used to determine the presence of historic-age architectural resources (45 years of age or older) in the APE that had not been previously evaluated for NRHP eligibility or locally designated.

The reconnaissance survey was conducted in accordance with the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation and guidelines established by the IL SHPO. Fieldwork for the survey was conducted August 3–5, 2020. The survey was conducted entirely from the public right-of-way.

Cultural resources—including buildings, structures, objects, sites, and districts—were evaluated for NRHP eligibility using the NRHP Criteria for Evaluation as defined in 36 CFR § 60.4. To be listed in, or considered eligible for, the NRHP, a cultural resource must typically be 50 years or older and meet at least one of the four following criteria:

1. The resource is associated with events that have made a significant contribution to the broad pattern of history (Criterion A);
2. The resource is associated with the lives of people significant in the past (Criterion B);
3. The resource embodies distinctive characteristics of a type, period, or method of construction; represents the work of a master; possesses high artistic value; or represents a significant and distinguishable entity whose components may lack individual distinction (Criterion C);
4. The resource has yielded, or may be likely to yield, information important in prehistory or history (Criterion D).

To accommodate the proposed Project's potential construction timeline, a 45-year standard was applied for this architectural resource investigation.

In addition to meeting at least one of the above criteria, a cultural resource must also retain sufficient integrity to convey the significance of the resource. Integrity is composed of location, design, setting, materials, workmanship, feeling, and association. Integrity is defined as the authenticity of a resource's historic identity, as evidenced by the survival of physical characteristics it possessed in the past and its capacity to convey information about a culture or group of people, a historic pattern, or a specific type of architectural or engineering design or technology.

Location refers to the place where an event occurred, or a resource was originally built. Design considers such elements as plan, form, and style of a resource. Setting is the physical environment of the resource. Materials refer to the physical elements used to construct the resource. Workmanship refers to the craftsmanship of the creators of a resource. Feeling is the ability of the resource to convey its historic time and place. Association refers to the link between the resource and a historically significant event or person.

Cultural resources meeting these standards (age, eligibility, and integrity) are termed "historic properties" under the NHPA. Sites, buildings, structures, or objects that are not considered individually significant may be considered eligible for listing in the NRHP as part of a historic district.

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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According to the NRHP, a historic district possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects that are historically or aesthetically united by plan or physical development (36 CFR § 60.3(d)).

### 4.8.2. Existing Conditions

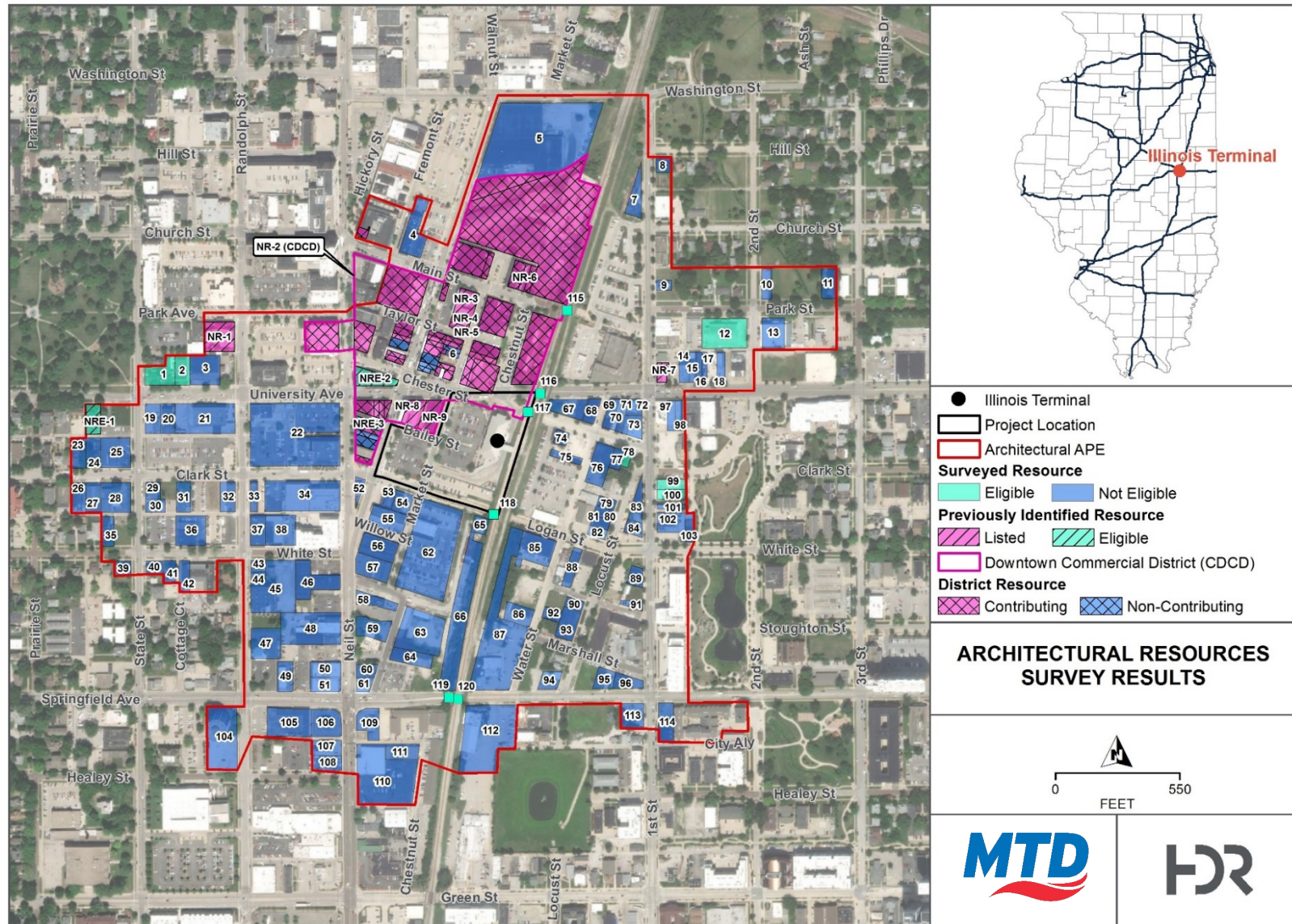
State and city records indicated 12 previously designated historic properties in the APE. The Champaign Downtown Commercial District (NR-2), includes 54 contributing resources, 36 of which are in the APE. See Figure 20 for the locations of the Architectural Resources Survey results.

Of the 175 historic-age resources identified in the APE, 55 had been previously evaluated for NRHP eligibility. The current survey evaluated a total of 120 historic-age resources. Historic functions include: 78 commercial, 17 residential, 6 industrial, 6 rail-related, 3 religious, 3 healthcare, 2 government, 1 social, and 4 unknown.

As a result of the survey, four previously unevaluated resources are recommended individually eligible for NRHP listing: the Champaign Armory at 109 East Park Street (Resource 12); the Roland Building at 75 East Chester Street (Resource 78); a commercial building at 202 South First Street (Resource 99); and a commercial building at 206 South First Street (Resource 100).

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

Figure 20. Architectural Resources Survey Results - Overview





## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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### 4.8.3. Environmental Impacts

#### Permanent Impacts

Regarding the potential effects of the Project on the historic properties in the APE, the proposed Project is located in an urban setting in the vicinity of several four- and five-story-plus buildings in the downtown area. While the proposed Project would add a new visual element in the setting (a mixed-use building seven stories tall, approximately 70 feet high), none of the historic properties in this investigation, either previously identified or those recommended eligible for NRHP listing as part of this investigation, identifies setting as a character-defining feature. The expansion of the Illinois Terminal and the construction of a maximum seven-story, mixed-use building would not impact the ability of any of the historic properties in the APE to convey historic or architectural significance. Based on the results of the investigation, the FTA has made a finding of no adverse effect to historic properties pursuant to 36 CFR § 800.5. SHPO concurred with this finding on March 24, 2021. See Architectural Resources Investigation for the Illinois Terminal Expansion Project and SHPO concurrence letter provided in Appendix C.

#### Construction Impacts

Construction of the proposed Project has the potential to have temporary, intermittent noise and vibration impacts to nearby historic properties during construction. Equipment used to move soil and other earthen materials are often the loudest construction noise sources. Construction would primarily take place within the existing Illinois Terminal Building and within the Project Area itself.

### 4.8.4. Measures to Avoid or Minimize Harm

There would be no permanent adverse effects to historic properties as a result of the proposed Project. With mitigation proposed in Section 4.14.4, there are no projected temporary impacts to historic properties due to noise or vibration during construction of the Project.

## 4.9. Environmental Justice

This chapter includes a discussion of applicable federal Environmental Justice (EJ) regulations and guidelines, describes the methods used in defining EJ populations, and discusses approaches for outreach to EJ populations. This chapter summarizes an analysis of EJ populations within the Study Area, defined as within a 0.25-mile radius of the Project Area, to determine if the Project would cause potential disproportionately high and adverse effects on EJ populations, and a discussion of how such disproportionate effects may be minimized or mitigated. See Appendix D, *Environmental Justice Technical Memorandum* for more detail.

### 4.9.1. Legal/Regulatory Context and Methodology

The analyses presented in this section were prepared in compliance with the following EOs, regulations, and guidance:

- EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (February 11, 1994),
- U.S. DOT Order 5610.2(a), Order to Address Environmental Justice in Minority Populations and Low-Income Populations (May 2, 2012),
- Circular FTA C4703.1, Environmental Justice Policy Guidance for Federal Transit Administration Recipients (FTA 2012),

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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- EO 13166, Improving Access to Services for Persons with Limited English Proficiency, and
- 415 ILCS 155, Environmental Justice Act.

As outlined in FTA Circular 4703.1, U.S. DOT and FTA are required to make EJ part of their mission by identifying and addressing disproportionately high and adverse human health or environmental effects of their actions on minority and low-income populations to the greatest extent practicable and permitted by law. EO 12898 seeks the "fair treatment and meaningful involvement of all people regardless of race, color, sex, national origin, or income with respect to the development, implementation and enforcement of environmental laws, regulations, and policies" (U.S. Environmental Protection Agency [EPA] 2015).

Meaningful involvement means that: 1) potentially affected community residents have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health; 2) the public's contribution can influence the regulatory agency's decision; 3) the concerns of all participants involved will be considered in the decision-making process; and 4) the decision makers seek out and facilitate the involvement of those potentially affected.

The framework for the EJ evaluation incorporated in this EA is based on FTA C4703.1, described above, which outlines a methodology that addresses EO 12898 including both a robust public participation process and an analytical process with three basic steps:

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

The term "minority" and "low-income" are defined by FTA Circular 4703.1. "Minority" includes persons who are American Indian/Alaska Native, Asian, Black/African American, Hispanic/Latino, and Native Hawaiian and other Pacific Islander. Guidance from the U.S. Environmental Protection Agency indicates that EJ populations may be present when the minority population in the defined study area is greater than 50 percent or is meaningfully greater than the minority population percentage in the general population. The Illinois Environmental Protection Agency (IEPA) defines minority EJ status as greater than twice the state average (38%) for the current American Community Survey (ACS) 5-year estimate. "Low-income" populations are defined as household incomes at or below the Department of Health and Human Services (DHHS) poverty guidelines. The 2020 DHHS poverty guidelines for a family of four is \$26,200 per year. The IEPA defines low income EJ status for individuals as greater than twice the state average (13.1%) for the current ACS 5-year estimate.

U.S. Census ACS census tract data was used to identify the percentage of disabled and/or elderly individuals within the Project Area. A desktop review of the Study Area was conducted to identify assisted living and senior living communities.

The analysis for both temporary construction and permanent impacts considers direct impacts and indirect or cumulative impacts on EJ populations based on the following factors:

- Direct impacts would be permanent, result from implementation of the proposed Project, and occur at the same time and place (40 CFR § 1508.8). A direct impact distance of 400 feet was applied. This distance was applied based on expected direct impacts from construction and implementation of this Project in an existing mixed urban setting.

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

- Indirect impacts would be caused by the proposed Project but are separated from direct impacts by time and/or distance and include induced growth and related environmental impacts, such as changes to land use patterns, population density or growth rates, and related impacts on air quality, water and other natural systems. Cumulative impacts would be those that result from the incremental impact of the proposed Project when added to other past, present, and reasonably foreseeable future actions, regardless of what agency or person undertakes such other actions. The Study Area was assessed for potential indirect or cumulative impacts on EJ populations affected by the proposed Project. Indirect and Cumulative Impacts are reviewed in Section 4.18.

### 4.9.2. Existing Conditions

There are 4,529 people living within the Study Area (ACS 2018). As listed in Table 6 and discussed in Appendix D, the most prevalent race is White (53.7 percent). Of the total population living within the Study Area, 46.3 percent are an EJ population. The two largest minority populations are Black/African American (18.3 percent) and Asian (17.4 percent). The state minority average is 38 percent.

**Table 6. Race within the Study Area**

Race/Ethnicity	Total Population	Percent of Total Population
<b>Total Population</b>	<b>4,529</b>	<b>100.00%</b>
<b>Not Hispanic or Latino:</b>	<b>4,163</b>	<b>91.9%</b>
White alone	2,434	53.7%
Black or African American alone	828	18.3%
American Indian and Alaska Native alone	-	-
Asian alone	787	17.4%
Native Hawaiian and Other Pacific Islander alone	-	-
Some other race alone	27	0.6%
Two or more races:	87	1.9%
Two races including Some other race	-	-
Two races excluding Some other race, and three or more races	87	1.9%
<b>Hispanic or Latino:</b>	<b>366</b>	<b>8.1%</b>
White alone	322	7.1%
Black or African American alone	16	0.4%
American Indian and Alaska Native alone	-	-
Asian alone	-	-
Native Hawaiian and Other Pacific Islander alone	-	-
Some other race alone	28	0.6%
Two or more races:	-	-



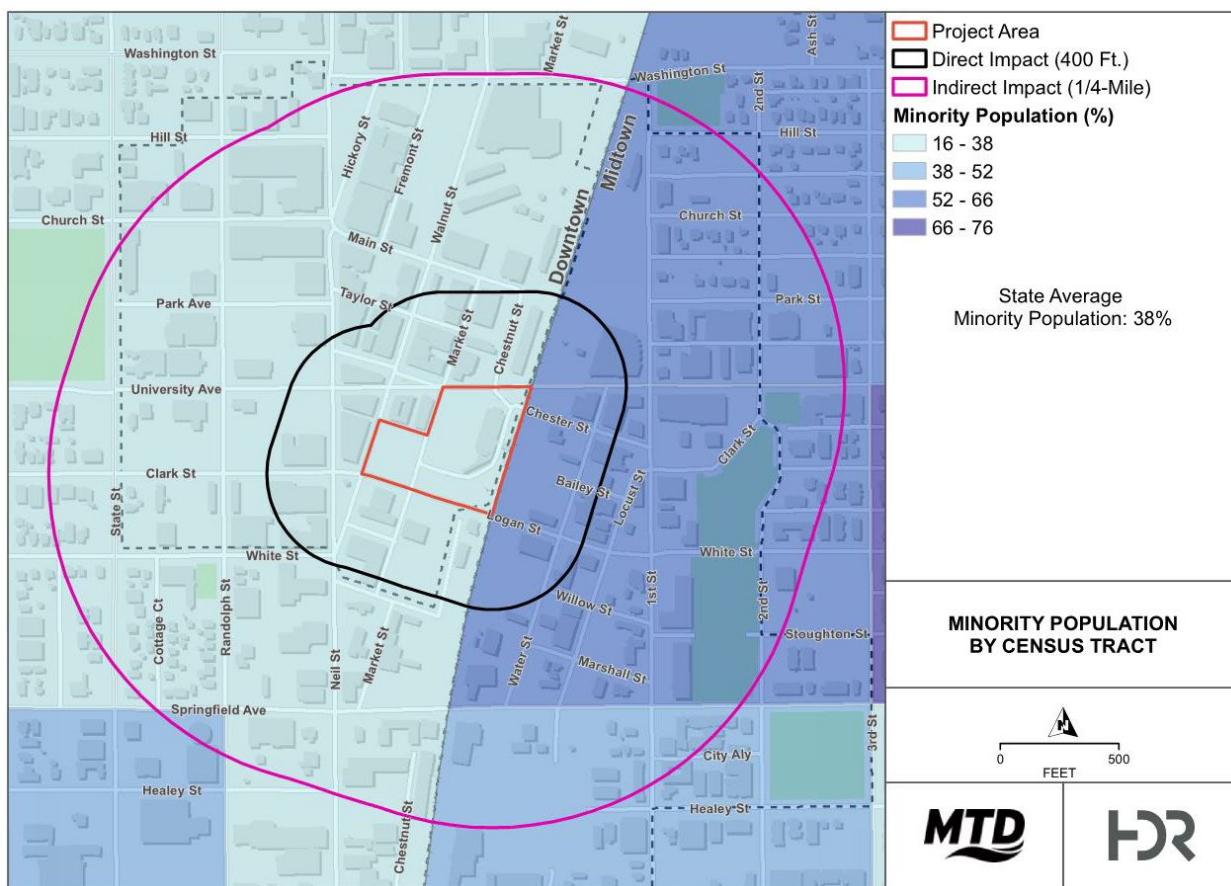
## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

Race/Ethnicity	Total Population	Percent of Total Population
Minority (Non-White)	2,095	46.3%
Non-minority (White, Not Hispanic or Latino)	2,434	53.7%

Source: US Census 2019 ACS 5-year Estimates

Geographically, minority populations within the Study Area are not dispersed equally (see Figure 21). Higher percentages of minority individuals are located east of the Project Area; however, few residences are located within the area of direct impact. Land uses to the east of the Project Area within the 400-foot area of direct impact include civic, industrial, and commercial uses. Within the area of direct impact east of the Project Area, it is estimated that there are fewer than eight residential units, with some apartments on the upper level of two commercial buildings and a loft-style furnished apartment building with four units marketed to students. There are also two buildings currently being renovated as a mixed-use development that would ultimately include ten market rate apartments, restaurant, and outdoor gathering space.

**Figure 21. Minority Population in the Study Area**



Incomes within the Study Area vary widely, as shown in Table 7. Within the Study Area, 38.7 percent of the population have incomes that are below the poverty threshold and would be considered an EJ population because this percentage is more than double the state average of persons in poverty (13.1 percent) and is higher than the Champaign County's average of 19.2 percent.

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

**Table 7. Population by Income to Poverty Level Ratio**

Ratio of Income to Poverty Level	Block Groups within Study Area		State of Illinois	
	Total	Percent of Total Population	Total	Percent of Total Population
<b>Total Population</b>	4,505	100%	12,523,283	100%
Under .50	1,348	29.9%	753,709	6.0%
.50 to .99	396	8.8%	881,894	7.0%
1.00 to 1.24	314	7.0%	515,668	4.1%
1.25 to 1.49	205	4.6%	504,434	4.0%
1.50 to 1.84	307	6.8%	721,667	5.8%
1.85 to 1.99	297	6.6%	307,825	2.5%
2.00 and over	1,638	36.4%	8,838,086	70.6%
<b>Low-Income</b>	1,744	38.7%	1,635,603	13.1%
<b>Non-Low-Income</b>	2,761	61.3%	10,887,680	86.9%

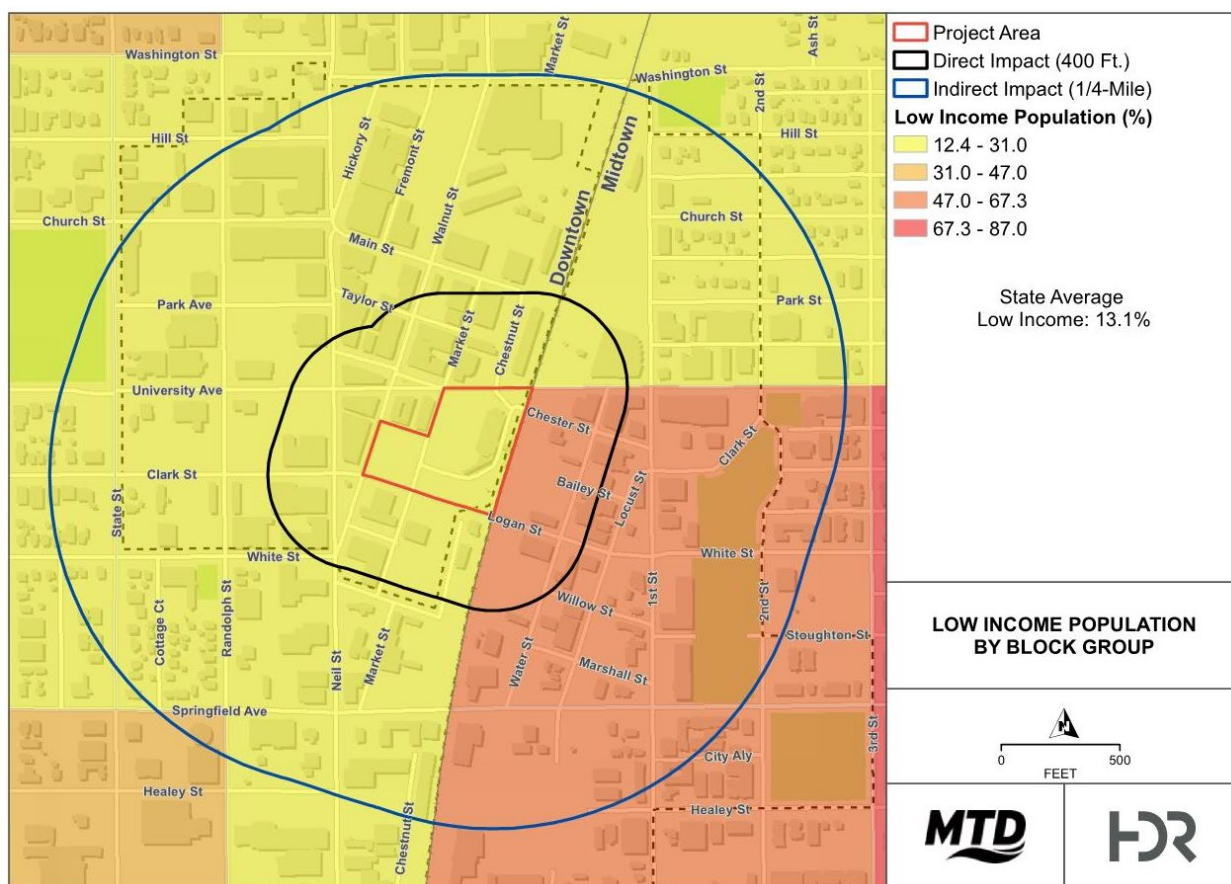
Source: US Census 2019 ACS 5-year Estimates

As shown in Figure 22, low income populations are more concentrated to the east of the Project Area. As noted with the minority population distribution, there are fewer than eight residential units within the direct impact area, to the east of the Project Area. While the block groups within the Study Area to the east include more than 40 percent of persons below the poverty level, census data show that 100 percent of the residents are renters and between the ages of 20 and 29. Considering the large supply of off-campus student housing in this area, residents are likely students of the nearby University of Illinois.

College students are not typically defined as a low income EJ community because, as compared to the general population, they are more likely to have access to financial support in the form of grants, scholarships, or other financial resources and may not need to generate income during college years. The U.S. Census Bureau notes that the inclusion of off-campus students in poverty determinations has a statistically significant effect on local poverty rates and may not accurately reflect the presence of vulnerable populations. In Champaign, inclusion of off-campus student housing in poverty determinations increased the poverty rate by 11.4 percent city-wide (U.S. Census Bureau 2017). Low income persons located west of the CN Railroad tracks within the area of direct impact make up 16.8 percent of the population, which is not appreciably higher than the State of Illinois' low income population of 13.1 percent.

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

Figure 22. Low Income Population within Study Area



A point-in-time survey was conducted in January 2020 by the Continuum of Service Providers to the Homeless and determined that there are 140 individuals experiencing homelessness across Champaign County, including an undefined number of individuals in the downtown Champaign area. Coordination with the Continuum of Service Providers to the Homeless revealed that there were no individuals experiencing homelessness identified as staying within the Project Area; however, there are services, such as the Canteen Run, that periodically sets up space south of Logan Street to distribute supplies and meals to those in need.

Census data was reviewed to identify the percentage of elderly and/or people with a disability within the Study Area, both of which are lower than the state average, as shown in Table 8. Individual block groups each have fewer elderly and/or disabled populations than the State of Illinois. A desktop review of senior and assisted living communities identified the following two developments to be included in this analysis:

- The Inman Place Independent Living and Senior Facility is immediately adjacent to the Project Area, within the area of direct impact.
- Eden Supportive Living Champaign is a 100% ADA-accessible apartment community for young adults searching for accessible housing with support services. It is located outside the area of direct impacts, but within the Study Area.

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

**Table 8. Elderly and/or Disabled Population**

Population	Within the Study Area	State
	Percent of Total Population	Percent of Total Population
Elderly (Age 65+)	5.6	11.2
Disability	6.1	7.7

Source: US Census 2019 ACS 5-year Estimates

### 4.9.3. Environmental Impacts

As indicated in Figure 21 and 22, census blocks within the Study Area include minority and low-income EJ populations. There are no defined minority or low-income EJ populations within the area of direct impact. There are approximately 60 households with seniors immediately adjacent to the Project Area and a community with accessibility adaptations within the Study Area. The following sections summarize the potential for disproportionate impacts and benefits of the proposed Project.

#### No Build Alternative

Under the No Build Alternative, no construction activities would occur and therefore, there would be no adverse impacts. The benefits associated with increased safety and accessibility to reliable transit, economic development and employment, and improved regional connectivity to employment and educational centers would also not be realized.

#### Build Alternative

##### *Permanent Impacts*

Within the area of direct impact, traffic, pedestrian, and bicycle circulation would be improved with the Build Alternative. The safety and transportation benefits would be shared by the community and surrounding EJ populations within the Study Area. The entire community would enjoy safer access and pedestrian circulation at the Illinois Terminal, increased reliability, and enhanced access to transit to access community facilities, major activity centers, health services, and employment.

There would be no impacts to, or displacement of, community facilities or parks in the area of direct impact. There would be perceivable visual changes to the Project Area once built, however, the resulting visual impacts are expected to be compatible with the inherent, established character and scale of the surrounding environment to the largest extent possible. The visual changes would be more perceivable to the senior residents of the Inman Place, as the location is directly adjacent to the Project Area. MTD would coordinate directly with Inman Place administration about the proposed Project.

The 2018 Illinois EPA Air Quality Index for the Metropolitan Area shows 77.5 percent of days were measured as having Good air quality, 21.4 percent were measured as “Moderate”, and 1.1 percent were considered “Unhealthy for Sensitive Groups.” The Project Area is in an attainment area for transportation-related air pollutants, the Build Alternative complies with the State Implementation Plan (SIP) for attaining and maintaining the National Ambient Air Quality Standards (NAAQS) and complies with the conformity requirements of the Clean Air Act (CAA). There would be no permanent impacts to EJ populations related to air quality.

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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Operational impacts of the Build Alternative as it relates to hazardous materials are expected to be minor and would be minimized by operating under a health and safety program. There would be no adverse impact to the surrounding EJ populations.

The Project Area is in a disturbed urban area and there would be no impacts to geology, soils, water resources, wetlands, floodplains, or threatened and endangered species.

### *Construction Impacts*

The Build Alternative would result in temporary construction impacts on downtown and midtown neighborhoods surrounding the Project Area. No disproportionately high and adverse impacts to minority and low income EJ populations due to construction are anticipated, because impacts would be temporary and experienced by EJ and non-EJ communities alike. However, the Inman Place Independent Living and Senior Facility and those in the area experiencing homelessness would experience direct temporary impacts related to noise, vibration, dust, and air quality, which would be mitigated as discussed in in Section 4.14.4. Construction activities for the Build Alternative would last up to approximately 12 months.

### **4.9.4. Measures to Avoid or Minimize Harm**

During the design of the proposed Project, MTD will coordinate with the City of Champaign, emergency response providers, and the directors of Inman Place, and Champaign County Continuum of Service Providers to the Homeless to discuss the proposed Project and construction.

The contractor will be required to develop a construction outreach plan to include specific techniques to communicate with neighborhoods, businesses, and the Champaign Urbana Canteen Run to prepare for construction. Methods of communication about upcoming construction may include a Construction Update section on the Project website, email alerts, and/or social media posts. In addition to traffic, visual, noise and vibration mitigation outlined in Sections 4.2, 4.7, and 4.14, MTD would manage construction stages with the contractor to maintain access and provide alternate access to business, residential, and community facilities with temporary access changes during construction. MTD would work with the Champaign Urbana Canteen Run to temporarily relocate supply distribution, if needed. As discussed in Section 4.4, Neighborhoods and Community Resources, the Project contractor would be required to prepare a plan for construction that outlines construction BMPs to be employed, including the following:

- maintenance of access,
- traffic control,
- access to businesses in the construction area,
- erosion and dust control,
- maintenance of equipment,
- noise and vibration, and
- guidelines included in USEPA's Construction Emissions Control Checklist.

MTD would also work with local governments and emergency response providers to ensure safe mobility would be maintained within the Project Area, including reasonable traffic plans, safe pedestrian-friendly crossings, and accessibility to businesses.



## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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### 4.10. Safety and Security

This section describes the general safety and security considerations related to the design and operation of the proposed Project. Safety includes all incidents within MTD property. Potential safety hazards include crashes, fires, property damage, injuries, and fatalities. Security refers to freedom from harm resulting from intentional acts or circumstances.

#### 4.10.1. Legal/Regulatory Context and Methodology

Transportation providers that receive federal financial assistance under 49 USC § 5307, Urbanized Area Formula Program, are required to meet safety and security standards and regulations set forth in the FTA's Public Transportation Agency Safety Plan (49 CFR Part 673) and National Public Transportation Plan.

The impacts for the proposed Project are assessed in this section by identifying the following:

- Whether adequate provisions for safe and secure operations would be made with the introduction of the Build Alternative;
- Whether the Build Alternative would alter existing patterns of vehicular, transit, and/or pedestrian accidents, and what design features would be included to avoid, minimize, or mitigate these accidents; and
- Whether the Build Alternative would improve safety and security compared to the existing conditions in the Project Area.

#### 4.10.2. Existing Conditions

MTD's Public Transportation Agency Safety Plan (PTASP) was adopted in June 2020 and provides guidance on MTD-specific policies and procedures, including safety management policies, performance targets, risk management, safety assurance, safety promotion, and documentation. A Safety Advisory Committee participates in formal processes to identify hazards, risks, mitigations, and monitoring. Safety training is provided to all employees and are linked to safety goals and targets. In addition, MTD's Quality and Environmental Policy commits to continual improvement by providing reliable, safe, secure, and environmentally responsible service.

Safety performance is measured annually, and performance targets are submitted to CUUATS and Illinois Department of Transportation after a Yearly Safety Review. Public safety and security in the Project Area are provided by the Champaign Police department, Fire Department, and emergency response units of the City of Champaign, as well as MTD's security staff.

The PTASP also provides the framework for ensuring passenger and employee safety on MTD property. The plan details safety actions and functions to be observed by all MTD employees along with facility maintenance and inspection guidelines. Safety actions include regular inspection and audits of stations and other facilities as well as detailed audit and reporting procedures followed by MTD.

#### 4.10.3. Environmental Impacts

##### No Build Alternative

Under the No Build Alternative, safety improvements for pedestrians, vehicles, and buses would not be constructed. As service continues to increase to better serve a growing population, congestion and



## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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constrained circulation at Illinois Terminal would worsen and impact traffic flow on University Avenue and Chester Street. More crashes would be expected to occur.

### Build Alternative

#### *Permanent Impacts*

The Build Alternative would enhance safety measures, security systems and procedures similar to those currently used by MTD to protect passengers, employees, and the surrounding community. The proposed Project would offer a safer transportation system by reducing platform congestion, controlling and dedicating areas to bus platforms, separating the various modes of transportation offered, and making visibility improvements, as discussed below.

Each bus or transit vehicle would have a dedicated platform with designs for passenger boarding and controlled cross walks for exiting and entering the platforms. Pedestrians will be directed to cross in marked and lit crosswalks. Barriers would be constructed to keep pedestrians from crossing in front of and behind buses at outdoor platform locations. In addition to accessing platforms at the ground level, passengers accessing buses at the outer platforms in the mixed-use structure would be able to cross over the platforms on the second floor of Illinois Terminal and use stairs or an elevator to board buses on the first floor. Taxi and rideshare passenger pick-up and drop-off would be separated from other traffic at the Illinois Terminal, with a dedicated location on the second floor of the mixed-use structure.

MTD, as the owner and operator of Illinois Terminal, follows safety and security policies that establish minimum requirements for facilities based on local, state, and federal codes or standards, including those for fire protection, building codes, American National Standards Institute standards, and American Society for Testing and Materials International standards. The design of the Build Alternative would meet the following minimum objectives:

- Design for minimum hazard through the identification and elimination of hazards through the use of appropriate safety design concepts;
- Use fixed, automatic, or other protective safety devices to control hazards that cannot be eliminated;
- Use warning signals and devices if neither designs nor safety devices can effectively eliminate or control an identified hazard; and
- Provide special procedures to control hazards that cannot be minimized by the aforementioned devices.

The Build Alternative would have a beneficial impact to safety and security.

#### *Construction Impacts*

Construction of the Build Alternative would require traffic detours, passenger boarding at temporary locations, and passenger circulation through active construction zones. The potential for hazards could be temporarily increased.

### 4.10.4. Measures to Avoid or Minimize Harm

The Contractor would be required to prepare a Construction Traffic Management Plan in coordination with MTD, City of Champaign Public Works Department, and emergency responders to identify construction phasing, maintenance of traffic, maintenance of access, and associated circulation on the Project site for vehicles, pedestrians, and bicyclists. Pedestrian detours would be provided, with signage,

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

fences, and handrails, as needed. Public use areas involving sidewalks, entrances to Illinois Terminal, and lobbies would be protected with appropriate barricades and adequate visibility. Doors, corridors, and areas to be used by the public would be kept clear and appropriate warnings, signs, and instructional safety information would be posted, as needed. The contractor would be required to maintain good housekeeping standards during construction.

### 4.11. Utilities

This section identifies potential impacts of the No Build and Build Alternatives on existing public utilities.

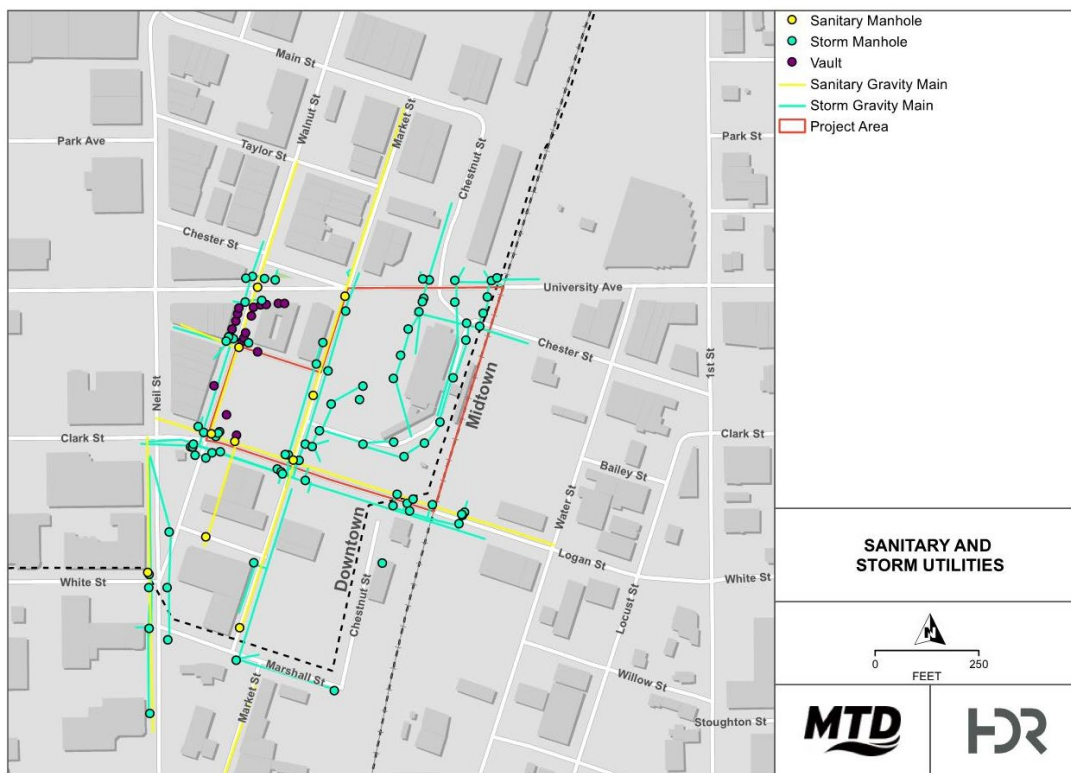
#### 4.11.1. Legal/Regulatory Context and Methodology

MTD reviewed municipal utility information provided by the City of Champaign, as well as preliminary information included in the 2015 Illinois Terminal Expansion Study to identify the presence of utilities within the Project Area and potential relocations or adjustments that could be required.

#### 4.11.2. Existing Conditions

The City of the Champaign and Urbana-Champaign Sanitary District provides utility services including storm and sanitary sewer infrastructure within their service boundaries. Municipal utility infrastructure is typically located within the street right-of-way. Stormwater lines run along University Avenue, Chester Street, and Market Street, with pipes connecting into the West parking lot immediately west of Illinois Terminal (see Figure 23). A 96-inch municipal storm sewer runs along the south side of Logan Street near the Project Area.

**Figure 23. Storm and Sanitary Sewer Facilities**



## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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Municipal sanitary gravity mains are present on Market Street and Logan Street. The City of Champaign conducted a Sanitary Sewer Feasibility Study in August 2018 to determine available capacity and potential system deficiencies of existing infrastructure. The existing sanitary sewer on Market Street was determined to be at or near capacity (Clark Dietz 2018), as virtually the entire downtown area is served by a single 12-inch diameter sanitary sewer. Conveyance problems originate from redevelopment that is occurring within and around the downtown area, which is effectively increasing sanitary sewer flows without increasing the size of the downstream sewer system. The Fiscal Year 2020/2021 Adopted Financial Plan for Community Services includes a capital project for the South Downtown Sanitary Sewer Project regardless of whether the proposed Project is constructed. The Sanitary Sewer Project is identified as a goal and initiative for the City's Economic Development Department and design is progressing. MTD will continue to work with the City and Core Spaces as design progresses. Additional funding is being pursued by the City of Champaign for construction of the Sanitary Sewer Project.

Illinois American Water is the City of Champaign's water service provider, with infrastructure located within the Project Area. A 12-inch municipal main for domestic water and fire service is located on Logan Street.

Ameren is the gas and electric provider for the City of Champaign. There are overhead electric distribution lines throughout the Project Area along Market Street, Logan Street and University Avenue. The utility poles in the right-of-way support the electric lines and other utilities including telephone, cable and fiber optic wires. There are existing overhead primary feeders on poles, beginning north of University Avenue, running along the west sidewalk of this property, turning west along Bailey Street, and crossing Walnut Street. A natural gas main is present on Logan Street.

Telecommunication providers include AT&T, Xfinity, Gargoyle Technologies, Inc., Jab Wireless, Inc., King Street Wireless, L.P. and Seaport/CWB iTV3. An iTV3 manhole is located on the north side of the Project Area and City fiber is located within the Project Area.

### 4.11.3. Environmental Impacts

#### No Build Alternative

Under the No Build Alternative, construction of the Project would not occur and there would be no impacts to utilities.

#### Build Alternative

##### *Permanent Impacts*

Coordination with affected utilities will commence with all significant utility facility owners within the potential area of impact during Project design. Utilities that anticipate removal, relocation, or upgrades will be identified. It is anticipated that with the City of Champaign's Sanitary Sewer Project and a mixed-use structure design that would adhere to the Illinois Energy Code that mandates durable, energy-efficient building systems, utility capacities would be sufficient to accommodate the proposed Project. Modifications to utilities will be coordinated with service providers to ensure disruptions are minimal. No permanent utility impacts are expected.

##### *Construction Impacts*

There may be temporary utility disruptions during utility relocations.

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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### 4.11.4. Measures to Avoid or Minimize Harm

The design architect and contractor would be required to coordinate complete utility locations and include utilities on construction plans. Coordination with the City of Champaign and the various utility companies will be conducted to identify any utility relocation agreements required.

The contractor would be required to provide affected utility customers advance notice of any planned utility disruptions.

### 4.12. Water Resources, Geology, and Soils

This section describes the existing conditions of water quality and stormwater, groundwater, and geology and soils in the Project Area. This section also discusses the potential impacts of the Build Alternative as well as the mitigation measures that MTD proposes to offset any Project-related impacts on water resources.

#### 4.12.1. Legal/Regulatory Context and Methodology

##### Water Quality and Stormwater

Section 303(d) of the Clean Water Act (33 USC § 1251 et seq.) requires states to publish a list of waterways every two years that are not meeting their designated uses because of excess pollutants (i.e., impaired waters). The 303(d) list is based on violations of water quality standards (33 USC § 1313). At the state level, Illinois EPA determines which waterways should be included in such a list.

Water resources in the Project Area were identified using the U.S. Geological Survey (USGS) 7.5-minute series quadrangle topographic maps, local USGS National Hydrography Datasets, USFWS National Wetland Inventory maps, lists of impaired waters prepared by the Illinois EPA under Section 303(d) of the CWA, and publicly available aerial photographs.

##### Groundwater

The Safe Drinking Water Act (42 USC § 300f, et seq.) protects the quality of public drinking water and its sources and establishes wellhead protection areas. The Safe Drinking Water Act requires states to develop a wellhead protection program to protect public water supplies from pollution. In Illinois, Illinois EPA administers the wellhead protection program. In addition, public water supplies are protected through the Illinois Groundwater Protection Act (P.A. 85-0863, 1987).

The U.S. EPA's Sole Source Aquifer Program authorizes review of federally-funded projects that are located over aquifers to identify public health risks. The CCRPC and Illinois EPA were consulted to determine the types of groundwater systems in the Project Area and whether the Build Alternative is subject to U.S. EPA review under the Sole Source Aquifer program.

##### Geology and Soils

Federal, state, and local governments may impose special restrictions on land use or land treatment based on soil properties. The following regulations and agencies may require permits to protect soil and geological resources during construction and/or operation of a proposed Project.

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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- Federal:
  - River Basin Activities (Natural Resources Conservation Service (NRCS)) General Manual Tile 150, Part 405)
  - CWA (33 USC § 1251 et seq.), Section 404 Permit
  - EO 11988, Floodplain Management (3 CFR § 117 [1978])
  - Watershed Protection and Flood Prevention Act (Public Law 566) National Watershed Manual
  - U.S. Department of Agriculture (USDA), Soil and Water Conservation Districts, Conservation Reserve Enhancement Program
- State:
  - Illinois EPA
  - Illinois DNR

MTD assessed soil characteristics and geological features and resources in the Project Area using a published online soil survey, surficial geology maps, and online mapping services provided by USDA-NRCS.

Using the USDA-NRCS Web Soil Survey, MTD determined suitabilities and limitations for use for all soil units in the Project Area. This determination resulted in ratings of “not limited,” “somewhat limited,” or “very limited” for the suitability of shallow excavations, as explained below (USDA-NRCS 2016):

- Not Limited: The soil has features that are very favorable for the specified use. Good performance and very low maintenance can be expected.
- Somewhat Limited: The soil has features that are moderately favorable for the specified use. The limitations can be overcome or minimized by special planning, design, or installation. Fair performance and moderate maintenance can be expected.
- Very Limited: The soil has one or more features that are unfavorable for the specified use. The limitations generally cannot be overcome without major soil reclamation, special design, or expensive installation procedures. Poor performance and high maintenance can be expected.

### 4.12.2. Existing Conditions

#### Water Quality and Stormwater

The most recent Section 303(d) List of Impaired Waters is from 2018. There are no waterways or wetlands located within the Project Area, however runoff from the site is a tributary to Boneyard Creek, which is listed as impaired for copper, dissolved oxygen, and phosphorus.

#### Groundwater

The Mahomet Aquifer is a major source of groundwater for the East Central Illinois region underlying 15 counties, including parts of Champaign County. While parts of the Mahomet Aquifer system were designated as a sole source aquifer by the U.S. EPA in 2015, the Project Area is outside the designated limits of the Mahomet Aquifer (see Figure 24).

The Project Area is not located within a wellhead protection area and the Project Area is over 4,000 feet away from the nearest community water supply wells, as shown on Figure 24.







## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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The Project Area is situated within the Dissected Till plain of the Central Lowland physiographic province of the State of Illinois. The uppermost geologic formation underlying the soils at the subject property is the Pennsylvanian Age Tradewater formation. The Tradewater formation comprises the underlying stratigraphy and consists mostly of shale with some limestone and coal beds.

Within the proposed Project Area, MTD determined that the existing soil composition contains 100 percent urban land soil characteristics. This soil type does not have a suitability and limitation rating. The Urban Land designation indicates that more than 90 percent of the original soils have been disturbed or covered by paved surfaces, buildings or other structures.

According to information obtained from previous subsurface investigations (45 East University Avenue), the underlying subsurface consists of organic clay from the ground surface to approximately 3 feet below ground surface and lean clay with some sand and gravel from 3 to 24 feet below ground surface. Groundwater was reportedly encountered between 4 and 12 feet below ground surface.

### 4.12.3. Environmental Impacts

The following section summarizes the potential impacts to water quality and stormwater, groundwater, and geology and soils from the No Build and Build Alternatives.

#### No Build Alternative

The No Build Alternative would not result in adverse permanent or temporary impacts to water quality and stormwater, groundwater, and geology and soils in the Project Area.

#### Build Alternative

##### *Permanent Impacts*

##### **Water Quality and Stormwater**

The Project Area is a tributary to Boneyard Creek, an impaired waterway. Water quality to this receiving stream could be further impacted by increased sediment as a result of construction activities and other pollutants typically found in urban stormwater runoff from parking lots and transportation land uses. However, the proposed Project would be constructed on areas already disturbed and impervious, and would create a negligible amount of additional impervious area. Therefore, long term water quality impacts are not anticipated.

##### **Groundwater**

A review of Illinois EPA's Source Water Assessment Program web mapping tool shows that the Project Area is not within a wellhead protection area nor a designated sole source aquifer. The proposed project will not likely result in discharges or impacts to the water table. In addition, the proposed Project will be connected to city water and sewer lines and will not need new groundwater appropriations.

The Project Area is currently on developed, urban land containing streets, parking lots, and buildings. The proposed project would not create a significant amount of additional impervious area, and therefore would not further inhibit groundwater recharge.

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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### Geology and Soils

There would be no permanent impacts to natural soils in the Project Area as the land is covered by streets, parking lots, buildings, and other structures of urban areas. The underlying geology would not be affected.

### Construction Impacts

Construction impacts associated with the Build Alternative would be limited to potential occurrences of sediment runoff that would not affect groundwater but may further affect the water quality of Boneyard Creek, the surface receiving water. Post construction impacts would be diminished in quality and any minor detection of hydrocarbons or metals would attenuate in the soil before reaching groundwater but may affect surface water. MTD would develop erosion and sediment control plans that incorporate BMPs to avoid or minimize construction-related impacts to groundwater.

#### 4.12.4. Measures to Avoid or Minimize Harm

Because the Project Area is greater than one acre, MTD and its contractor would obtain Construction Stormwater General Permit from the Illinois Environmental Protection Agency in compliance with the National Pollutant Discharge Elimination System and would adhere to any conditions laid out in the permits to minimize impacts to water resources during construction.

Impacts to water quality would not be anticipated after implementation of BMPs during construction and adherence to permit conditions. These would include: implementing BMPs during construction, including preparing an erosion control plan and a stormwater management plan, installing silt and drift fences, informing contractors of areas that must be avoided during construction, and requiring an environmental specialist to be on site during construction, among other requirements.

### 4.13. Hazardous Materials

This section discusses the potential for encountering hazardous materials during proposed Project construction and implementation. Hazardous materials may include: petroleum products, pesticides, organic compounds, heavy metals, asbestos-containing materials, lead paint, or other compounds that would harm human health or the environment (ASTM E1527-13). The nature and extent of contamination can vary widely; early detection, evaluation, and determination of appropriate remediation of hazardous materials are essential. Information in this section is derived from the *Phase I Environmental Site Assessment* and *Phase II Environmental Site Assessment* included in Appendix E.

#### 4.13.1. Legal/Regulatory Context and Methodology

Federal and state laws have been established for the protection of human health and the environment. At the federal level, the regulations include the Resource Conservation and Recovery Act (RCRA)(42 USC § 82); the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)(42 USC § 103); the Superfund Amendments and Reauthorization Act (SARA)(42 USC § 9601 et seq.); the Clean Air Act (CAA)(42 USC § 7401 et seq.); the Toxic Substances Control Act (TSCA)(15 USC § 2601 et seq.); and the Occupational Safety and Health Act (OSHA)(29 USC § 15).

At the state level, regulations and programs are administered by the Bureau of Land within the Illinois Environmental Protection Agency.

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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The Phase I Environmental Site Assessment (ESA) was conducted in general conformance with ASTM International (ASTM) E1527-13, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (ASTM International 2013). The purpose of the Phase I ESA was to identify Recognized Environmental Conditions (REC) and to provide information for use in evaluating the potential impacts of RECs on the proposed Project. RECs can also be defined as controlled RECs (CRECs). Historical RECs (HRECs) are conditions that are no longer considered a REC for a given property. RECs, CRECs, and HRECs are defined in further detail below:

A **REC**, as defined by ASTM E1527-13, is the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. De minimis conditions are not RECs. A de minimis release, as defined in ASTM E1527-13, is a release that generally does not pose a threat to human health or the environment and that generally would not be the subject of an enforcement action if it were brought to the attention of appropriate government agencies.

A **CREC**, as defined by ASTM E1527-13, refers to a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls.

An **HREC**, as defined by ASTM E1527-13, refers to a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls.

The Phase I ESA process used to evaluate the Project Area for potential contamination included the following primary components:

- A review of federal, state, and local regulatory databases was conducted to identify listings for the Subject Property (the proposed Project Area) and adjoining properties that currently or have historically handled, stored, transported, released, or disposed of hazardous or regulated materials, as these types of sites are potential sources of hazardous material contamination.
- A review of historical sources such as historical Sanborn® fire insurance maps, topographic and aerial maps, and other sources for the analysis (EDR 2020).
- Interview with person(s) knowledgeable about the Subject Property.
- Site reconnaissance of the Project Area and surrounding properties, noting current land use and site conditions that may indicate the presence of contamination in association with the property.

Due to the potential for impacts determined in the August 2020 Phase I ESA, 16 soil borings were completed at the Christie Clinic parking lot, West parking lot, South parking lot, and Illinois Terminal parcel to further characterize and assess the RECs near the Project Area's proposed construction.

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

### 4.13.2. Existing Conditions

The Phase I ESA identified five RECs and no CRECs in association with the Project Area. Historical uses of the Project Area are illustrated on Figure 25. Additional evaluation of other existing conditions onsite included the identification of one HREC, *de minimis* conditions, and notable environmental conditions.

**Figure 25. Historical Uses of Project Area**





## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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### *Recognized Environmental Conditions (RECs)*

#### **1) Historical Railroad Operations**

The portion of the Project Area east of South Market Street operated historically as a railroad terminal. Several tracks had been installed and removed prior to 1924, and a single track remains in the Railroad Right-of-Way Parcel.

Railroad operations can cause contamination including semi-volatile organic compounds (SVOCs) such as creosote and pentachlorophenol (PCP) from wood preservative, volatile organic compounds (VOCs) from lubricants used to maintain trains, and heavy metals and herbicides from track maintenance. The Project Area's historical use as a railroad terminal is considered a REC.

#### **2) Automobile Repair Garages**

Three automobile repair garages have operated at the Project Area:

- A repair garage in the northwest corner of Christie Clinic Parking Lot operated in 1924.
- A repair garage in the southwest corner of Christie Clinic Parking Lot operated between 1924 and 1958.
- A repair garage in the southeast corner of Christie Clinic Parking Lot operated between 1924 and 1974.

Automobile repair garages are commonly contaminated with petroleum hydrocarbons and VOCs from automotive fluids spilled during repairs, and leaking waste oil storage tanks. Repair garages can also be contaminated with PCBs from leaking hydraulic lifts installed after the mass manufacturing of PCBs in the United States in 1929. The historical presence of three automobile repair garages at the Project Area is considered a REC.

#### **3) Industrial History of the Project Area**

The Project Area has contained several manufacturing facilities, food processing plants, and a lumber yard throughout its history:

- A blacksmith shop and wagon yard were located in the northern portion of Christie Clinic Parking Lot between 1897 and 1909.
- The southern portion of Christie Clinic Parking Lot included a machine shop, a foundry, and a tin shop between 1897 and 1937.
- A cigar factory was located in the southwest portion of Christie Clinic Parking Lot in 1915.
- A dairy plant was located in the southeast portion of Christie Clinic Parking Lot in 1915.
- Illinois Terminal Parcel and University & Market Municipal Parking Lot operated as a lumber yard between 1887 and 1924.
- National Biscuit Co. operated in the southern portion University & Market Municipal Parking Lot in 1915.
- A dairy processing plant was located in the Logan & Market Parcel between 1924 and 1951.

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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The Project Area may have been impacted by the industrial land use, resulting in potential contamination from VOCs (from fuels, lubricants, and solvents), SVOCs (from wood preservatives and nearby combustion), and heavy metals (from manufacturing processes). The historical presence of these industrial uses is considered a REC.

### 4) Historical Gasoline and Oil Storage Building at Illinois Terminal Parcel

A building identified as “Gasoline and Oil Storage” was depicted on a Sanborn Map dated 1924. No additional information as to the type of petroleum storage (above ground storage tank [ASTs] or underground storage tanks [USTs]) associated with the building was provided by the map.

The historical presence of a gasoline and oil storage building may indicate the presence of petroleum contamination at the parcel and could be associated with the USTs removed between 1996 and 1998. The historical presence of the gasoline and oil storage building is considered a REC.

### 5) Historical Aboveground Storage Tanks in eastern portion of Project Area

Several ASTs have been located in the southeastern portion of the Project Area since 1924 until the 1970s. It is possible that these ASTs may have leaked and contaminated the southeastern portion of the Project Area with petroleum hydrocarbons. The historical presence of the ASTs at the Project Area is considered a REC.

#### *Historical Recognized Environmental Conditions (HREC)*

##### **Historical Leaking Underground Storage Tanks**

Fourteen leaking underground storage tanks were removed from the Illinois Terminal Parcel and the University & Market Parking Lot between 1996 and 1998. OSFM reported significant to major soil contamination during the tank excavations.

Illinois EPA issued an NFA/NFR determination in 1997 for thirteen of the leaking underground storage tanks (LUSTs) after meeting remedial action objectives. Remedial action was not required for the fourteenth LUST because it had been taken out of service prior to January 2, 1974.

Petroleum hydrocarbon, VOC, and lead contamination are likely present at the Project Area from the LUST incidents; however, the incidents have been closed by Illinois EPA. The fourteen historical LUSTs and likely remaining contamination at the Project Area is considered an HREC.

#### *De Minimis Conditions*

##### **Historical Hydraulic Elevators**

Several elevators have been present in several historical buildings at the Project Area. Although hydraulic elevators have been common throughout the twentieth century, and hydraulic fluid has historically contained PCBs, all of the elevators observed during the Sanborn Map review were installed prior to the mass manufacturing of PCBs in the United States in 1929. The historical presence of suspect hydraulic elevators at the Project Area is de minimis.



## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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### *Notable Environmental Conditions*

#### **Historical Steam Laundry Facility**

White Star Steam Laundry was located in the southwest portion of the University & Market Municipal Parking Lot in 1909. During the 1900s, steam laundry facilities were named for their method of power, and not their method of cleaning. Additionally, trichloroethylene was not widely used in dry cleaning operations. The historical presence of White Star Steam Laundry is not a REC.

#### **Hydraulic Elevator in the Illinois Terminal Building**

A hydraulic elevator is present inside of the Illinois Terminal Building. Hydraulic fluid no longer contained PCBs when the elevator was installed during the building's construction in 1998. The elevator was observed to be well maintained and does not pose a material threat of release. The presence of the hydraulic elevator at the site is not a REC.

#### **Service Station and Underground Storage Tanks described in LUST Incident Report**

A LUST in 1998 after observing a historical service station and two USTs on a Sanborn Map. None of the Sanborn Maps reviewed during this Phase I ESA depicted a service station or UST within the Illinois Terminal Parcel or the University & Market Parking Lot. A service station with two USTs was depicted in a 1951 Sanborn Map, approximately 130 feet north of the Project Area. BC&A likely misidentified the service station formerly located at 44 East University Avenue as being located within the Project Area. BC&A proceeded with the excavation at University & Market Municipal Parking Lot and did not find any UST or soil contamination. The erroneous report of a historical service station and two USTs, and the resulting incident case is not a REC.

#### **Chemical Storage Areas**

Chemical storage areas observed during the site reconnaissance were well maintained. The presence of the chemical storage areas is not a REC.

#### **Leaking Underground Storage Tanks at Nearby Properties**

LUSTs have been reported to Illinois Emergency Management Agency at 11 East Logan Street in 2007, and 202 South Chestnut Street in 1993. Neither site is upgradient from the Project Area and are unlikely to have affected the environmental quality of the Project Area. These LUST incidents are not RECs.

#### **Phase II ESA Results**

Sixteen soil borings were completed during the Phase II ESA and compared against the Illinois Environmental Protection Agency's (IEPA's) Tiered Approach to Corrective Action Objectives (TACO). Applicable standards for the Project Area are listed in *Section 742. Table B: Tier 1 Soil Remediation Objectives for Industrial/Commercial Properties* of the TACO guidance document. Soil Remediation Objectives in this table include thresholds for ingestion, inhalation, and soil component of groundwater ingestion pathways. A detailed summary of laboratory samples and findings is provided in the Phase II Environmental Site Assessment in Appendix E.

VOCs, PCBs, or herbicides were not detected at concentrations above their respective reporting limits in any of the soil samples collected. Laboratory samples collected from 12 of the soil borings contained SVOCs at concentrations exceeding their respective reporting limits. Nineteen SVOCs were detected at the

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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Project Area. Four SVOCs were detected in two samples exceeding their applicable Soil Remediation Objectives and Migration to Groundwater Guidelines.

The detection of five different polycyclic aromatic hydrocarbons were identified in the northern portion of the Christie Clinic Parking Lot, which was once used for auto repair and an unpaved parking garage during the 1920s.

The detection of mercury in exceedance of its Soil Remediation Objectives for inhalation was identified in the northern portion of the Christie Clinic Parking Lot, the West parking lot, the southeast corner of the Illinois Terminal parcel, and the South parking lot. This may be attributed to the presence of historical fill materials or historical industrial operations.

Groundwater at the Project Area is classified as Class II, which is a general resource groundwater that is limited in quality and/or quantity. The detection of 16 different metals in exceedance of their Class II Migration to Groundwater standards were identified throughout the Project Area. All of the metals were compared to their respective pH Specific Soil Component of Groundwater Ingestion Exposure Route Values with the correct pH value. Selenium was detected in exceedance of its Class II Groundwater Ingestion Exposure Route Values in the eastern portion of the Christie Clinic Parking Lot, the southern portion of the West lot just north of the bus station driveway, and the eastern portion of the South lot.

### 4.13.3. Environmental Impacts

The following discussion summarizes the potential impacts from hazardous materials for the Build Alternative.

#### Permanent Impacts

##### *No Build Alternative*

The No Build Alternative would not encounter any hazardous materials and/or petroleum products since the proposed Project would not be constructed.

##### *Build Alternative*

The Build Alternative would include the operation of the expanded terminal. Minor storage and use of petroleum products, solvents, and other materials for maintenance purposes may occur. The facility may also generate used oil during the course of operation.

Due to the identification of potential sources of volatile contaminants onsite, indoor air quality issues from vapor intrusion could be a concern if high enough concentrations of these contaminants are found in the soil and/or groundwater onsite and left in place.

#### Construction Impacts

##### *No Build Alternative*

The No Build Alternative would not encounter any hazardous materials and/or petroleum products, since the proposed Project would not be constructed.

##### *Build Alternative*

Construction activities for the proposed Project could disturb/uncover existing contamination in the soil and/or groundwater inside the construction footprint. Contaminants located outside the construction

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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footprint could also affect the proposed Project, if migration of contaminants from offsite sources has occurred.

The Build Alternative would require ground disturbance for the construction of the expanded facilities and green space across the site. A total of five RECs were identified on the property.

Contaminants of potential concern include SVOCs and heavy metals. Previous contamination was approved to be left in place by the Illinois EPA. Much of the proposed construction areas are paved in asphalt and concrete. The removal of these impervious surfaces for construction may result in contaminant exposure to construction workers, the general public, and the environment.

### 4.13.4. Measures to Avoid or Minimize Harm

#### Long-Term Operating Effects

##### *No Build Alternative*

The No Build Alternative would still result in minor impacts due to the continued operation of the facility.

##### *Build Alternative*

The operational impacts of the Build Alternative are also expected to be minor. The operation of the expanded facilities mainly includes additional platforms, a multi-level parking garage, mixed-use facility (retail and residential), entrance improvements, and green space. Any additional storage and generation of regulated wastes including oils, greases, solvents, and other waste materials will be disposed of in accordance with state and local guidelines. The facility would continue to operate under a health and safety program that will include provisions for the safe handling, storing, and disposal of regulated materials. In doing so, operational impacts regarding regulated materials are minimized to the extent feasible.

#### Short-Term Construction Effects

##### *No Build Alternative*

The No Build Alternative would not encounter any existing subsurface hazardous materials and/or petroleum products, since disturbance for construction for the proposed Project would not occur.

##### *Build Alternative*

The Build Alternative would require substantial ground disturbance, including the removal of much of the existing impervious surfaces within the Project Area. A total of five RECs and other environmental conditions were identified in the Phase I ESA. Given the varied historical land use on the Project Area, which included many potential sources for contamination, it is likely that contaminated media could be encountered during construction. Therefore, a Phase II ESA was completed to identify areas of known contamination prior to construction. Further characterization of the Project Area may be required as design progresses and locations and methods of footings are determined.

A Materials Management Plan (MMP) for the proposed construction activity would be prepared to properly address material handling and potential disposal in areas identified in exceedance of regulatory standards. The MMP would also address unforeseen contamination that is encountered during construction. The plan will include awareness training and a response plan for engineering and construction crews to properly identify signs of contamination during subsurface activity. Engineering and

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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construction crews would be required to immediately stop work and report the apparent contamination to their supervisor, who would take immediate and appropriate action to protect worker and public safety.

Inactive wells, USTs, or other hazardous materials or wastes could be encountered during planning and construction. If present, they would be properly closed and removed in accordance with state and local requirements. Inactive water wells would be closed so as to not provide a conduit for possible groundwater contamination. If a UST is encountered, it would be removed in accordance with applicable regulatory requirements, and confirmation soil sampling would be conducted to determine if a release had occurred. If hazardous materials or wastes are encountered, the appropriate state regulatory agency would be contacted. Building renovations are proposed for the Illinois Terminal Building, which was constructed in 1998. Based on the age of the building, the presence of asbestos and lead in building materials is unlikely. However, a survey by a qualified contractor will be conducted to verify that these regulated materials are not present prior to construction.

A copy of the Phase II ESA would be provided to the Contractor for review to determine if additional worker safety considerations relating to exposure to contaminated soils needs to be addressed in their Health and Safety Plan.

Prior to construction, MTD would also coordinate with Illinois EPA and enroll in the voluntary clean-up program to address areas of known contamination and request to eliminate the Migration to Groundwater Pathway using pavement as an engineering control.

### 4.14. Noise and Vibration

This section describes the predicted noise and vibration impacts of the proposed Project using the FTA Transit Noise and Vibration Impact Assessment manual. A Noise Screening and General Noise Assessment, as well as a Vibration Screening and General Vibration Assessment were conducted. More information can be found in the *Noise and Vibration Technical Memorandum* in Appendix F.

#### 4.14.1. Legal/Regulatory Context and Methodology

Procedures published by the FTA were used to evaluate the potential for noise and vibration impacts at sensitive receiver locations in the Project Area. The criteria are described in the FTA's 2018 *Transit Noise and Vibration Impact Assessment* (FTA Manual). The guidance sets forth the basic concepts, methods, and procedures for evaluating the extent and severity of the noise and vibration impacts resulting from transit projects.

Noise is "unwanted or undesirable sound," generally measured in terms of loudness. The loudness or magnitude of noise determines its intensity and is measured in decibels (dB). The overall noise level from transit sources is described in A-weighted decibels (dBA). The A-weighted decibel scale was developed to approximate the way the human ear responds to sound levels. Because the decibel is based on a logarithmic scale, a 10-dB increase in noise level is generally perceived as a doubling of loudness, while a 3-dB increase in noise is just barely perceptible to the human ear (FTA 2018).

The equivalent average sound level ( $L_{eq}$ ) is often used to describe sound levels that vary over time, usually a 1-hour period. Using 24 consecutive 1-hour  $L_{eq}$  values, it is possible to calculate daily cumulative noise exposure. A common community noise metric is the Day-Night Average Sound Level (DNL or  $L_{dn}$ ). The  $L_{dn}$  is the 24-hour  $L_{eq}$  but includes a 10-dBA adjustment on noise that occurs during nighttime hours (between

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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10 PM and 7 AM) when sleep interference might be an issue. The  $L_{dn}$  is useful when assessing noise in residential areas, or land uses where overnight sleep occurs (FTA 2018).

The proposed Project would expand an existing bus and train station where a single railroad track currently exists. FTA thresholds for noise and impacts depend on existing noise levels. As existing noise levels increase, the allowed increase in transit noise exposure decreases.

### Noise Assessment Methodology

The noise screening, and general assessment consists of the following general steps:

- Establish the Project Area and identify noise-sensitive receptors
- Evaluate the existing conditions and establish corresponding impact thresholds
- Calculate the noise effects due to the proposed Project
- Identify receptors anticipated to experience moderate or severe noise impacts under the Build Alternative.

The purpose of the noise screening assessment is to determine if there are noise-sensitive land uses located close enough to a proposed Project to require an additional assessment to evaluate the potential for noise impacts. Using the FTA Manual, the project type is selected and the corresponding screening distance for unobstructed line of sight or the presence of intervening buildings is applied. Since this Project does not intend to alter the rail services and the addition of buses will occur whether or not the proposed Project is constructed, neither the trains nor the buses need to be analyzed. However, the Build Alternative would include a net increase of approximately 138 parking spaces within the Project Area that would be directed to a five-floor parking garage. This assessment used the Parking Facilities project type and applied the unobstructed screening distance of 125 feet from the center of the noise generating activity. This analysis assumes that the parking garage structure will shield most of the noise from vehicles using the additional parking spaces. Therefore, the center of the noise generating activity is located at the driveway for the proposed parking garage, from which there is an unobstructed line of sight to locations off-site.

Receptors that are potentially influenced by the noise from the proposed Project are those that are described in land use categories 1, 2, or 3, as shown in Table 9. Noise sensitive receptors were identified by reviewing a combination of available land use-related GIS data; available digital aerial photographs; and other area photography, including publicly available internet imagery. Receptors in the Project Area were identified and categorized for noise sensitivity based on the descriptions in Table 9.

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

**Table 9. Noise Land Use Categories**

Noise Land Use Category	Description of Land Use Category
1	Land where quiet is an essential element of its intended purpose. Example land uses include preserved land for serenity and quiet, outdoor amphitheaters and concert pavilions, and national historic landmarks with considerable outdoor use. Recording studios and concert halls are also included in this category.
2	This category is applicable to all residential land use and buildings where people normally sleep, such as hotels and hospitals.
3	This category is applicable to all land uses with primarily daytime and evening use. Example land uses include schools, libraries, theaters, and churches where it is important to avoid interference with such activities as speech, meditation, and concentration on reading material. Places for meditation or study associated with cemeteries, monuments, museums, campgrounds, and recreational facilities are also included in this category.

Source: FTA 2018

The existing noise environment was estimated using the distances to the roadway and rail, and the population density in accordance with Section 4.4, Step 5 of the FTA Manual. This estimation considered the proximity to University Avenue (located immediately north of the Project Area), the proximity to the intercity rail line (east side of the Project Area), and a population density of 21,009 people per square mile within the Study Area.

Utilizing the FTA General Noise Assessment spreadsheet model, the impact assessment was performed for each receiver by inputting the estimated existing noise, project data, and receiver data. The average number of automobiles per hour was estimated to be 175 during daytime hours and 50 during nighttime hours.

The noise impact thresholds used for the assessment were based on existing noise levels and represent the FTA limits of allowable increase in noise levels. FTA's noise impact thresholds provide the framework for identifying the magnitude of the impact. Impact was determined from the FTA General Noise Assessment spreadsheet model and classified for each receiver as none, moderate, or severe. The moderate impact threshold defines areas where the noise would be noticeable, but might not be sufficient to cause a strong, adverse community reaction. The severe impact threshold defines the noise limits above which a substantial percentage of the population would be highly annoyed by new noise.

### Vibration Assessment Methodology

The proposed Project will only change the number of rubber-tired vehicles accessing the parking spaces and does not include changes to the existing rail line or bus service. FTA does not consider passenger cars to be a source of vibration concerns. Therefore, vibration impact assessment related to operations is not necessary, according to Figure 6-3 in the FTA Manual.

Construction vibration for the proposed project site was assessed using the quantitative methods outlined in section 7.2 of the FTA Manual. Quantitative construction vibration analysis is appropriate for projects involving the use of large construction equipment that may result in building damage or prolonged annoyance.



## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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### 4.14.2. Existing Conditions

#### Noise

One noise-sensitive receptor, Inman Place, was identified and is a Land Use Category 2. Using FTA methods as described above, the existing  $L_{dn}$  is 60 dBA at Inman Place. READY school is a land use Category 3 but is excluded from the operational noise analysis because the location is outside of the noise screening distance of 125 feet from the noise generating activity, which is at the entrance to the parking garage.

#### Vibration

In addition to Inman Place and READY school, there is a radiology clinic that is approximately 200 feet from the western most project boundary that was included in the construction vibration analysis because radiology clinics utilize diagnostic imaging equipment that is sensitive to ground-borne vibration.

### 4.14.3. Environmental Impacts

The following sections summarize the potential noise impacts of the No Build and the Build Alternative.

#### No Build Alternative

There would be no change in noise levels under the No Build Alternative.

#### Build Alternative

##### *Permanent Impacts*

#### Noise

Based on the existing  $L_{dn}$  of 60 dBA, the moderate noise impact threshold is an  $L_{dn}$  of 58 dBA and the severe noise impact threshold is an  $L_{dn}$  of 63 dBA. Results from the noise analysis indicate that the additional parking spaces under the Build Alternative will result in an  $L_{dn}$  of 42 dBA, which is below both the moderate and severe noise impact thresholds. Therefore, project-related noise will not cause noise impacts as defined by FTA.

#### Construction Impacts

The construction noise and vibration assessments used the center of the proposed Project site as the origin for construction noise and vibration calculations.

#### Noise

Construction noise for the proposed Project was assessed according to Section 7 of the FTA Manual. A quantitative construction assessment was used to estimate construction noise because construction is expected to be longer than a month, and noisy equipment would be used. For projects in the early assessment stage, when construction equipment and the schedule are undefined, FTA recommends the general assessment option be used.

The construction equipment most likely to be used during the proposed project was selected for each of the two phases of site development (demolition and construction) based on assumptions made about the existing conditions on-site and the proposed plan. The following scenarios were assessed:

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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- Demolition: A jackhammer and bulldozer will be the two loudest pieces of equipment used to break up existing concrete and asphalt.
- Construction: An impact pile driver and a generator will be the two loudest pieces of equipment.

Using Equation 7-1 from the FTA Manual, individual equipment noise levels were calculated in A-weighted decibels (dBA) for the two loudest pieces of equipment to be used during each proposed project phase. Noise levels were calculated from the center of the proposed project site to the nearest receptors.

There are two construction noise-sensitive receptors identified near the Project Area. One receptor is the READY Program school that leases space inside the existing Illinois Terminal. It was analyzed as a commercial land use, according to the General Assessment Construction Noise Criteria from Table 7-2 in the FTA Manual. The READY Program school is approximately 83 feet from the center of the Project Area.

The other receptor is Inman Place, which is a multi-floor retirement community located across Bailey Street. It was analyzed as a residential land use according to the General Assessment Construction Noise Criteria from Table 7-2 in the FTA Manual. Inman Place is approximately 226 feet from the center of the Project Area.

This set of calculations represents anticipated average noise levels, due to the construction equipment being mobile and presumed to operate anywhere within the proposed project site at a given time. Noise levels of combined equipment were then calculated for each phase using decibel addition for comparison to General Assessment Construction Noise Criteria from Table 7-2 in the FTA Manual.

The resulting noise for the commercial receptor was 85 dBA and 97 dBA for the demolition phase and construction phase, respectively. Noise levels are below the applicable commercial land use criterion of 100 dBA. The resulting noise for the residential receptor was 77 dBA and 88 dBA for the demolition phase and construction phase, respectively. Construction noise levels are projected to be below the applicable residential land use criterion of 90 dBA for daytime.

Therefore, significant adverse impacts from construction noise are not anticipated at either receptor. However, a more detailed assessment of construction noise may be warranted if there are significant changes to the construction equipment, if noise sources are operated for prolonged periods close to receptors, or if construction activities occur during nighttime hours.

Construction activities will be conducted in accordance with City, State, and Federal guidelines, and will use best practices to limit noise, such as limiting construction activities to normal daytime working hours, limiting idling equipment, and additional preventative actions as the construction plan is finalized.

### Vibration

Construction equipment vibration source levels are assessed in terms of peak particle velocity (PPV in/sec) and vibration velocity level ( $L_v$ ; measured in vibration decibels (VdB), which are compared to FTA criteria for building damage and annoyance, respectively. Per the FTA Manual, construction vibration is assessed for each piece of equipment individually using Equation 7-2 for PPV and Equation 7-3 for  $L_v$ . The following scenarios were assessed based on the same assumptions made in the construction noise assessment:

- Demolition: Loaded trucks will be the largest vibrational source.
- Construction: An impact pile driver will be the largest vibrational source.

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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Similar to the general assessment method for construction noise, vibration levels were calculated at the READY Program school and Inman Place. This set of calculations represents the anticipated average vibration levels due to the construction equipment being mobile and presumed to operate anywhere within the proposed project site at a given time.

A second set of calculations was utilized to represent the maximum vibration levels that may be experienced by sensitive receptors near the proposed project site when vibration sources are operating at the closest proposed project site boundary. Inman Place is approximately 40 feet from the Project boundary on Bailey Street. The radiology clinic is approximately 200 feet from the western most project boundary.

FTA's construction vibration criteria from Table 7-5 in the FTA Manual outlines construction vibration criteria for a variety of building types. Although the majority of surrounding receptor buildings appear to be constructed of masonry, they are also likely to contain plaster walls due to their age and are conservatively categorized as Type III buildings for the purpose of damage assessment.

Table 5 in the Noise and Vibration Technical Memorandum presents the construction vibration assessment results and facilitates a comparison with FTA construction vibration criteria for building response and human response to vibration. Comparison of the calculated PPV values to FTA damage assessment criteria values indicates that, on average, when the equipment is operating near the center of the proposed project site, construction vibration from an impact pile driver operating in its upper range would not pose a risk of damage to non-engineered timber and masonry buildings that may have plaster walls. PPV values calculated using the minimum distance of 40 feet indicate that impact pile drivers at a typical to upper range and sonic pile drivers operating in the upper range pose a risk of damage to non-engineered timber and masonry buildings when operated in close proximity to proposed Project Area boundaries; however, a sonic pile driver operating at its typical range would be below the FTA construction vibration criteria for damage.

Comparison of the calculated VdB values to FTA annoyance assessment criteria values indicates that when equipment is operating near the center of the proposed project site, construction vibration would pose a risk of annoyance to people on-site at the Illinois Terminal building, including those at the READY Program school, if an impact pile driver is operated near its upper range, but not its typical range. Additionally, operation of an impact pile driver or sonic pile driver at its upper range at the proposed project site boundaries would result in increased annoyance to the residential receptor 40 feet away. The use of a sonic pile driver at its typical range would not exceed the FTA's annoyance assessment criteria values at 40 feet away.

Using FTA construction vibration assessment methods, the highest project-related construction vibration level is an Lv of 85 VdB from an impact pile driver operating in its upper range at the radiology clinic. This indicates strong potential that construction vibration can interfere with use of sensitive diagnostic imaging equipment at the radiology clinic.

### 4.14.4. Measures to Avoid or Minimize Harm

The need to mitigate Project operational noise and vibration is not necessary since there are no noise impacts, and because ground-borne vibration is not a concern with passenger vehicles using the additional parking spaces. This analysis assumes that the proposed mixed-use building will be designed

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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and constructed to provide indoor noise and vibrational levels that are compatible with overnight sleep and would achieve the FTA's indoor noise and vibration criteria.

Construction noise levels are projected to be just below the FTA's recommended construction noise criterion. A detailed assessment of construction noise may be warranted if there are significant changes to the construction equipment roster or if noise sources are operated for prolonged periods close to receptor buildings.

If impact pile drivers or sonic pile drivers are operated at their upper ranges, potential construction vibration levels could approach or exceed FTA construction vibration criteria posing a risk of damage to non-engineered timber and masonry buildings and could also approach or exceed the vibration tolerances for diagnostic imaging equipment at the radiology clinic.

During final design, MTD and its engineers would consult with the radiology clinic to understand its needs and concerns as it relates to vibration and may decide that a more detailed construction vibration assessment is warranted. Alternatively, MTD would require that the contractor use construction methods and techniques that decrease the amount of vibration experienced at sensitive receptor sites.

At a minimum, MTD will implement the following mitigation measures to minimize the vibration impacts during construction:

- MTD will include noise and vibration performance specifications in construction contract documents that are consistent with City of Champaign ordinances.
- Construction contractors would be required to develop a construction noise and vibration management plan. This may be a singular plan or it may be included in a larger environmental management plan for the construction project. At a minimum, the plan would include the following:
  - Identification of the proposed Project's noise control objectives and potential components;
  - Summary of noise and vibration-related criteria and local ordinances for construction contractors to abide by;
  - Requirement of a pre-construction survey to identify receptors potentially affected by construction noise and vibration and documentation of the pre-construction conditions of particularly susceptible receptors. This would include, at a minimum, the radiology clinic, the READY Program school, and the Inman Place;
  - List of potential mitigation measures, a plan to implement mitigation, and an approach for deciding the appropriateness of mitigation by construction activity and receptor;
  - Identification of methods to minimize noise impacts on adjacent noise-sensitive stakeholders while maintaining construction progress;
  - Plans for coordination with affected project stakeholders to minimize intrusive construction effects; and
  - Process to handle and resolve any noise or vibration-related complaints.

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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### 4.15. Air Quality

This section evaluates the short-term and long-term effects of the proposed Project on air quality. A qualitative analysis was completed to assess potential air quality impacts.

#### 4.15.1. Legal/Regulatory Context and Methodology

The Clean Air Act of 1990 (CAA) (42 U.S.C. § 7401 et seq.) and its associated regulations are the basic federal statutes and regulations governing air pollution. The provisions that are potentially relevant to this Project are the National Ambient Air Quality Standards (NAAQS), the Transportation Conformity rule, and mobile source air toxics (MSAT). Each of these provisions is discussed below.

##### *NAAQS*

The CAA requires U.S. EPA to establish NAAQS for pollutants considered harmful to public health and the environment. Primary standards set limits to protect public health. Secondary standards set limits to protect public welfare (U.S. EPA 2016).

U.S. EPA has established NAAQS for six principal pollutants, which are called “criteria” pollutants. These pollutants are carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), ozone (O<sub>3</sub>), lead (Pb), particulate matter at both 10 microns (respirable particulate matter; PM<sub>10</sub>) and 2.5 microns or less (fine particulate matter; PM<sub>2.5</sub>), and sulfur dioxide (SO<sub>2</sub>).

##### *Transportation Conformity Rule*

The Transportation Conformity Rule (40 CFR Part 93, Subpart A) requires that projects that are developed, funded, or approved by U.S. DOT and by metropolitan planning organizations or other recipients of federal funds demonstrate conformity with the State Implementation Plan (SIP) developed pursuant to the CAA. A determination of conformity is made by the metropolitan planning organization and U.S. DOT.

Air quality conformity is a process intended to ensure that FTA funding goes to transit activities that are consistent with the air quality goals set forth in the CAA. Air quality conformity applies to two levels of transportation activity:

- Metropolitan transportation plans (MTPs) and transportation improvement programs (TIPs) developed by metropolitan planning organizations (MPOs) in accordance with the Federal Highway Administration (FHWA)-FTA planning regulation (23 CFR Part 450).
- Projects funded by FTA and located in areas that do not meet (nonattainment areas), or previously have not met (maintenance areas) the National Ambient Air Quality Standards (NAAQS) for a transportation-related pollutant.

##### *MSAT*

In addition to the NAAQS, the CAA requires U.S. EPA to regulate MSAT. MSATs are a subset of air toxics, which include nine compounds emitted from highway vehicles, trucks, buses, and non-road equipment. Diesel particulate matter remains the dominant MSAT of concern for highway and other transportation projects.

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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### 4.15.2. Existing Conditions

The Build Alternative is in the Champaign-Urbana Urbanized Area Transportation Study's (CUUATS) FY 2020-2025 Transportation Improvement Program as Project Number 19-02. The Champaign-Urbana Urbanized Area maintains an overall "attainment status" for all of the NAAQS pollutants.

MTD's 114-bus fleet is 92 percent hybrid and a fleet of 60-foot, zero-emission, hydrogen fuel cell buses are scheduled for deployment beginning in 2021. Increasing the proportion of low and zero emission transit vehicles in MTD's fleet to 100 percent by 2025 is one of the main objectives in the Transportation Improvement Program for 2020-2025 developed by the CUUATS.

### 4.15.3. Environmental Impacts

#### No Build Alternative

Under the No Build Alternative, the dedicated bus platforms and mixed-use facility would not be constructed. Congestion within the Illinois Terminal property and on adjacent streets would worsen as service is added, resulting in more idling vehicles. While replacement of MTD's older diesel fueled fleet buses with diesel-electric hybrid and zero emission models would continue, intercity and rural transit providers with diesel fleets would continue to circle Illinois Terminal and idle, waiting for a boarding location to become available.

#### Build Alternative

##### *Permanent Impacts*

The Build Alternative was evaluated for compliance with state and federal air quality requirements. Because the Project Area is in an attainment area for transportation-related air pollutants, the Build Alternative complies with the SIP for attaining and maintaining the NAAQS and complies with the conformity requirements of the CAA. The Build Alternative would result in an overall beneficial impact on air quality by reducing bus congestion and improving reliability and accessibility of the transit system, thereby attracting new passengers that may otherwise travel by car within the community.

##### *Construction Impacts*

The Build Alternative could result in some temporary impacts on air quality during construction, primarily due to fugitive dust and emissions from diesel construction equipment and trucks. Construction and earthmoving activities could result in localized increases in pollutant concentrations that would persist for the duration of the construction activities near the Inman Place senior living facility, which is adjacent to the Project Area.. Because the Illinois Environmental Protection Agency has strict guidelines for controlling fugitive dust, diesel particulate emissions, and greenhouse gas (GHG) emissions, these impacts would be minimized through implementation of appropriate construction BMPs identified in U.S. EPA's Construction Emissions Control Checklist. Contractors would also be required to employ dust control measures as part of its erosion control permit.

### 4.15.4. Measures to Avoid or Minimize Harm

To reduce adverse air quality impacts during construction, MTD would direct the contractor to follow U.S. EPA's Construction Emissions Control Checklist, prepare and implement a dust control plan, a work-zone traffic management plan, and a strategy to control emissions from diesel-powered equipment. The strategies that could be employed include limiting idling of construction equipment during periods of



## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

inactivity, maintaining construction equipment in proper working condition, and limiting dust-producing construction activities near the Inman Place Building.

### 4.16. Threatened and Endangered Species

This section summarizes the existing federal and state threatened, endangered, and rare species and potential impacts of the proposed Project on these resources.

#### 4.16.1. Legal/Regulatory Context and Methodology

The following laws regulate federal and state listed threatened and endangered species in Illinois:

- Endangered Species Act of 1973 (16 U.S.C. §§ 1531-1544)
- Migratory Bird Treaty Act of 1918 (16 USC §§ 703–712, as amended)
- Illinois Endangered Species Protection Act (520 ILCS 10/)
- Illinois Natural Areas Preservation Act (525 ILCS 30/)

Information in this section is derived from the following reports included in Appendix G:


- Illinois Department of Natural Resources Ecological Compliance Assessment Tool (EcoCAT) for the Illinois Terminal Expansion at The Yards, completed 6/15/2020
- U.S. Fish and Wildlife Service IPaC Resource List for the Project Area, completed 6/15/2020

The abovementioned reports include figures depicting the Project Area investigated for the proposed Project.




#### 4.16.2. Existing Conditions

MTD completed the Illinois DNR EcoCAT and the USFWS IPaC for the Project Area. Four species were identified by the IPaC review as having the potential to occur within the Project Area, as listed in Table 10.

**Table 10. Federal and State Threatened or Endangered Species**

Species	Listing Status	Primary Threats	Photo
Indiana bat ( <i>Myotis sodalis</i> )	Endangered (Federal level)	White nose syndrome Wind farms <sup>1</sup>	 Photo Credit: Ann Froschauer

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

Species	Listing Status	Primary Threats	Photo
Northern long-eared bat ( <i>Myotis septentrionalis</i> )	Threatened (Federal level) Endangered (State level)	White nose syndrome Habitat loss <sup>1</sup>	 Photo Credit: Al Hicks
Eastern Prairie Fringed Orchid ( <i>Platanthera leucophaea</i> )	Threatened (Federal level)	Habitat loss or degradation Collection Pesticides or other pollutants	 Photo Credit: Marlin Bowles
Prairie Bush-clover ( <i>Lespedeza leptostachya</i> )	Threatened (Federal level)	Habitat loss	 Photo Credit: Phil Delphey

Sources:

<sup>1</sup> Boyles et al. 2011

The Project Area is an urbanized area. The existing and future uses of the Project Area include railroad tracks, parking, retail, residential and a bus terminal, which represent a consistent noise disturbance. No suitable habitat for any listed species is located within or adjacent to the Project Area. For the bat species, there is no potential winter habitat (e.g. caves, mines) within the Project Area and the adjacent railroad bridge is unlikely to provide suitable habitat for either listed bat species due to its urban location, light pollution in the area, and lack of roosting trees and foraging areas in the vicinity including upland and riparian woods. There are few trees located within the Project Area and all are urban trees. For the flowering plants, all vegetated areas are landscaped and do not contain appropriate habitat for the listed species.

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

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### 4.16.3. Environmental Impacts

#### No Build Alternative

The No Build Alternative would not change the Project Area's biological resources or quality and would not result in adverse impacts to biological resources.

#### Build Alternative

The Build Alternative would not change the Project Area's biological resources or quality. No adverse permanent or temporary impacts to biological resources would occur as a result of the proposed Project.

### 4.16.4. Measures to Avoid or Minimize Harm

Since no potential habitat exists within the urbanized Project Area, no mitigation measures are proposed.

## 4.17. Indirect and Cumulative Effects

### 4.17.1. Legal/Regulatory Context and Methodology

Indirect effects are defined by the Council on Environmental Quality as follows:

“Effects” include:

(b) Indirect effects, which are caused by the action and are later in time or farther removed in distance but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.

Effects and impacts, as used in these regulations, are synonymous (40 CFR § 1508.8) (1978).

Cumulative impacts are defined as follows:

“Cumulative impact” is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR § 1508.7) (1978).<sup>2</sup>

Additional guidance for this analysis comes from Considering Cumulative Effects under the National Environmental Policy Act (CEQ, 1997), Guidance on the Consideration of Past Actions in Cumulative Effects Analysis (CEQ, 1995), and National Cooperative Highway Research Project Report 466, Desk Reference for Estimating the Indirect Effects of Transportation Projects (TRB, 2002).

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<sup>2</sup> The new regulations adopted by the Council on Environmental Quality define effects more narrowly and limits the analysis of effects to those things that are under the control of the agency and would not have happened without the proposed action. The requirement to analyze cumulative impacts has been repealed. FTA has not issued any guidance on the application of the new rules.

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

Present and reasonably foreseeable future projects within the Study Area are identified in Table 11, including both public and private development projects. Past projects will be addressed in the existing conditions or background analysis conducted for each resource. An assessment will be made within each of the resource areas relative to potential cumulative and indirect effects.

**Table 11. Present and Reasonably Foreseeable Future Projects**

Action	Sponsor	Description	Timing	Potential Impacts
The Yards Private Development	Core Spaces	Hotel and conference center, office, retail, University of Illinois sports arena, practice ice, community ice rink, and parking structure	TBD	Construction, traffic, land use, visual resources, utilities, economics
Midtown Crossing Historic buildings rehabilitation Phase 1, Chester and Water Street, Phase 1, 2, & 3	Cochrane Premier	Historic rehabilitation of commercial structures into retail, residential and event space	2020-2023	Construction, traffic, land use, economic
News-Gazette Distribution Center Redevelopment	Janet Bubin	Adaptive reuse of historic structure with new mixed-use commercial and residential	2022-2023	Construction, traffic, land use, economic
24 East Green Street Multi-use building construction	Green Street Center LT	New 153-unit apartment building with ground-floor retail	2021	Construction, traffic, land use, visual resources, economics
Hotel Aloft Hotel construction 401 North Neil St.	401 North Neil St. LLC	7-story hotel construction	TBD – Development Pending	Construction, traffic, land use, visual resources, economics
Boneyard North Branch 2 upgrade	City of Champaign	Channel enlargement, culvert/bridge reconstruction, and detention upgrades.	2021	Construction, traffic, land use, community resources, water resources

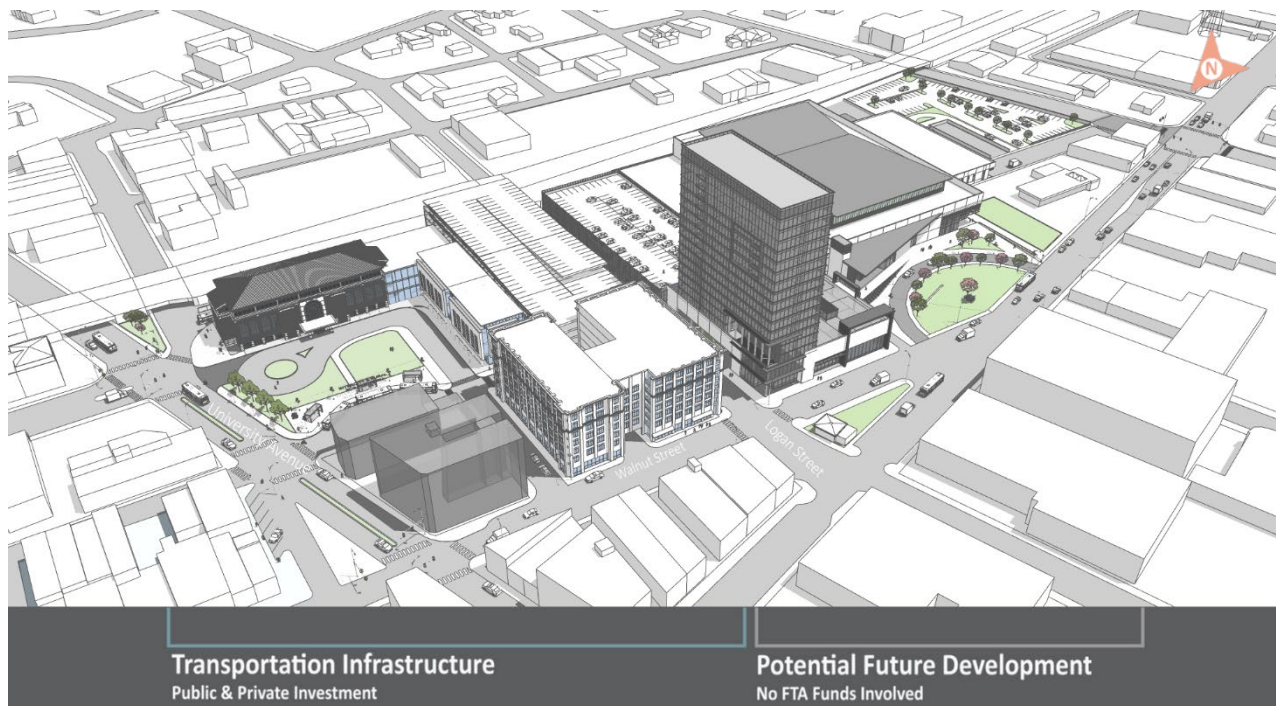
## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

Action	Sponsor	Description	Timing	Potential Impacts
Downtown Plaza upgrades  Neil St and Washington St	City of Champaign	Preliminary design of the Downtown Plaza that includes changes to existing plaza and adding a live event stage	Design: 2020 Construction: TBD	Construction, traffic, land use, visual resources, community resources
Neil Street Reconstruction	City of Champaign	Reconstruct Neil Street between the Church/Main intersection and University Avenue and install new streetscape elements (sidewalk, pavement, curb, street lighting) along the corridor.	Design: 2022-2024 Construction: 2025-2026	Construction, traffic, visual resources
Springfield Avenue Rehabilitation	IDOT	Rehabilitation of Springfield Avenue including designed overlay and ADA improvements from Prospect Avenue to Wright Street.	2021-2025	Construction, traffic

Separate, but related to the Illinois Terminal Expansion Project, the largest regional future development in the City of Champaign is The Yards Private Development, to be completed south of Logan Street, immediately adjacent to the Project Area. The Yards Private Development would be completed by MTD's joint development partner, Core Champaign Hockey, LLC. The Yards Private Development project proposes a hotel and conference center, office tower, residential apartments, University of Illinois sports arena, practice ice, community ice rink, and parking structure, as shown in Figure 26 and detailed in Table 12. The project would be situated on land south of Logan Street, north of Springfield Avenue between Neil Street and the CN Railroad tracks. The Yards Private Development project is projected to provide employment opportunities for residents and increase sales for downtown retail, services and entertainment businesses. The location of The Yards Private Development adjacent to Illinois Terminal will allow local and regional attendees of events at the conference center and area to easily access the events using transit. Design is anticipated in 2022-2023, with construction start dates to be determined.

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

**Figure 26. Illinois Terminal Expansion Project and The Yards Private Development**



**Table 12. Scope of Illinois Terminal Expansion Project and Proposed Private Development South of Logan Street**

Illinois Terminal Expansion North of Logan Street	The Yards Private Development South of Logan Street
24,000 SF Illinois Terminal expansion and renovation	400 space Parking Structure
Expanded bus platforms	180-room hotel
90,000 SF of tenant space	Conference Center capable of hosting up to 1,000 visitors
19,000 SF of retail	5,000 seat multi-use arena
374 space parking structure	Practice Ice Rink with seating for 500
179 Residential units	Community Ice Rink with seating for 500



## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

### 4.17.2. Environmental Impacts

Indirect and cumulative effects of the present and reasonably foreseeable projects are summarized in Table 13.

**Table 13. Indirect and Cumulative Impacts**

Resource Area	Indirect Effects	Cumulative Impacts
Transportation	None expected; Level of Service anticipated to remain at an acceptable level as projected.	Localized increase in traffic and parking, which would be accommodated by private development. Attendees at The Yards Private Development may use available public parking within the Illinois Terminal parking deck.
Land Use	Induced infill development on underutilized parcels to the south and west would increase density, consistent with comprehensive plans.	Positive impact on development; increased density for more efficient land uses and increased cohesion with surrounding areas.
Neighborhoods and Communities	Positive impact on development; induced development to continue cohesive connections to surrounding districts and associated wayfinding would make area more walkable and strengthen cohesion.	Positive impact on development and community resources.
Economics	Positive impact from residential and retail; land values could increase as demand for housing choices close to a multi-modal transit hub grows.	Positive impact from conference center and ice arena, expanded tourism to boost patronage of local businesses and draw more businesses to the area, tax revenue from infill development.
Visual Resources and Aesthetics	Induced infill development to achieve greater density could change visual quality of the area.	Larger scale development and new residential buildings could change visual quality of the area south of Illinois Terminal.
Cultural Resources	None expected	None expected
Environmental Justice	Induced infill development may have a beneficial effect by including affordable housing, development and space for local businesses and incubators.	Positive impact on development.
Safety and Security	None expected	Positive impact on safety and security because of increased activity and human presence.

## 4. ENVIRONMENTAL RESOURCES, IMPACTS, AND MITIGATION

Resource Area	Indirect Effects	Cumulative Impacts
Utilities	None expected	Development in the downtown core would increase demand on sanitary sewer infrastructure.
Water Resources, Geology, Groundwater and Soils	None expected	None expected
Hazardous Materials	None expected	None expected
Noise and Vibration	Temporary minor impacts during construction.	Temporary minor impacts during construction.
Air Quality	None expected	Not expected to jeopardize attainment status.
Biological Resources	None expected	None expected
Construction Impacts	Minor temporary increase in dust, noise, and vibration.	Temporary localized increase in dust, noise, vibration.

## 5. Section 4(f) Evaluation

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### 5.1. Legal/Regulatory Context and Methodology

Publicly owned parks and historic sites (publicly and privately owned) are protected from adverse impacts from federally funded transportation projects under Section 4(f) of the Department of Transportation Act (49 USC § 303). Terms used under this statute and procedures for compliance are prescribed at 23 CFR Part 774 and FTA Standard Operating Procedure 18.

Protections are triggered when a project “uses” a protected resource. “Use” is defined as follows:

Use. Except as set forth in 23 CFR §§ 774.11 and 774.13, a “use” of Section 4(f) property occurs:

- (1) When land is permanently incorporated into a transportation facility;
- (2) When there is a temporary occupancy of land that is adverse in terms of the statute’s preservation purpose as determined by the criteria in § 774.13(d); or
- (3) When there is a constructive use of a Section 4(f) property as determined by the criteria in 23 CFR § 774.15. (23 CFR 774.17).

Section 4(f) applies to historic sites as follows:

(e) In determining the applicability of Section 4(f) to historic sites, the Administration, in cooperation with the applicant, will consult with the official(s) with jurisdiction to identify all properties on or eligible for the National Register of Historic Places (National Register). The Section 4(f) requirements apply to historic sites on or eligible for the National Register unless the Administration determines that an exception under § 774.13 applies. (23 CFR § 774.11(e))

“Constructive use” is defined as follows:

(a) A constructive use occurs when the transportation project does not incorporate land from a Section 4(f) property, but the project’s proximity impacts are so severe that the protected activities, features, or attributes that qualify the property for protection under Section 4(f) are substantially impaired. Substantial impairment occurs only when the protected activities, features, or attributes of the property are substantially diminished.

If there is a use of protected property, the procedures for approval of the project provide as follows:

The Administration may not approve the use, as defined in § 774.17, of Section 4(f) property unless a determination is made under paragraph (a) or (b) of this section.

(a) The Administration determines that:

- (1) There is no feasible and prudent avoidance alternative, as defined in § 774.17, to the use of land from the property; and
- (2) The action includes all possible planning, as defined in § 774.17, to minimize harm to the property resulting from such use; or

(b) The Administration determines that the use of the property, including any measure(s) to minimize harm (such as any avoidance, minimization, mitigation, or enhancement measures)

committed to by the applicant, will have a *de minimis* impact, as defined in § 774.17, on the property (23 CFR 774.3)

The Project Area and its immediate vicinity were reviewed to determine whether any protected properties were present. The presence of any park property was determined visually. The procedure to determine the presence of historic sites or property is described in Section 3.9 of this environmental assessment.

### 5.2. Existing Conditions

#### 5.2.1. Publicly owned Parks

There are no parks located within or immediately adjacent to the Project Area.

#### 5.2.2. Historic Sites

Twelve buildings are listed in the NRHP, and one historic district is listed, which includes 54 contributing resources. Three buildings have been determined eligible for NRHP listing. Four previously unevaluated resources are recommended individually eligible for NRHP listing: the Champaign Armory at 109 East Park Street (Resource 9); the Roland Building at 75 East Chester Street (Resource 75); a commercial building at 202 South First Street (Resource 94); and a commercial building at 206 South First Street (Resource 95). For more detail on historic properties, see the *Architectural Resources Investigation for the Illinois Terminal Expansion Project* in Appendix C.

Regarding the potential effects of the Project on the historic properties in the APE, the Project is located in an urban setting in the vicinity of several five-story-plus buildings in the downtown area. On March 24, 2021, IL SHPO concurred with a finding of ***no adverse effect*** to historic properties pursuant to 36 CFR § 800.5.

### 5.3. Environmental Impacts

#### 5.3.1. Permanent Impacts

##### No Build Alternative

Under the No Build Alternative, the existing parcels and land uses in the Project Area would remain unchanged. There is not potential for a direct, temporary, or constructive use of any Section 4(f) property.

##### Build Alternative

Operation of the Build Alternative would not permanently or temporarily acquire or occupy any Section 4(f) property, therefore, there would be no direct impacts. There would be no use of any historic properties or properties recommended eligible for NRHP listing.

As discussed in Section 4.0, operation of the Build Alternative would not result in noise, vibration, visual, or access impacts that would substantially impair any property protected by Section 4(f). None of the historic properties in the Historic Properties investigation, either previously identified or those recommended eligible for NRHP listing, counts setting as a character-defining feature. The expansion of the Illinois Terminal and the construction of a maximum seven-story, mixed-use building would not impact the ability of any of the historic properties in the APE to convey historic or architectural

significance and a finding of no adverse effect is proposed. There would be no constructive use of any historic properties or those recommended eligible for NRHP listing.

### 5.3.2. Construction Impacts

There would be no substantial impairment of any historic property during construction that would diminish the protected activities, features, or attributes of the property and no use would occur.

### 5.4. Measures to Avoid or Minimize Harm

No mitigation measures are necessary because there would be no use of historic properties protected by Section 4(f).

### 5.5. Conclusion

There would be no “use” of historic properties located within the Area of Potential Effect, as defined in the regulations and guidance adopted to implement Section 4(f) of the Department of Transportation Act.

## 6. Public Involvement and Agency Coordination

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This section describes the public engagement activities MTD has undertaken for the proposed Project. The outreach activities follow MTD's Public Involvement Plan and follows recommendations to inform, consult, and involve the community in the development of the proposed Project.

The following subsections provide a summary of outreach activities completed to date.

### 6.1. Public Outreach

#### 6.1.1. Early Outreach Activities

MTD and the City of Champaign began public discussions about the expansion of Illinois Terminal in 2015 and there were multiple City of Champaign Council public working sessions between 2017 and 2019 discussing the project and potential private partnerships to complete the project and encourage redevelopment in the downtown area, as evidenced in the 2016 Redevelopment Plan and Downtown Fringe TIF District documents. Further outreach was conducted among business owners during development of a Market Study completed in 2018.

#### 6.1.2. Online Public Meeting

Traditionally, public meetings are held in person; however, with public gathering restrictions related to COVID-19, an on-demand virtual option was implemented for the Project's public kickoff. The purpose of the meeting was to present conceptual plans for the expansion of Illinois Terminal and receive comments and questions about the proposed Project. A 15-minute recorded presentation was posted to the Project Website (ITTheYards.com), MTD's YouTube Channel, and Illinois Terminal's dedicated social media channels (Facebook and Twitter). The public was encouraged to submit questions and provide input. The presentation was available for the formal comment period from September 14 through October 14.




A press release was distributed to media outlets on September 15 and postcards were mailed to a stakeholders list. The press release and postcards specified that anyone without internet access could call MTD Customer Service or visit the Customer Service Counter at Illinois Terminal to receive a printout of the presentation and comment forms. A social media campaign with facts about the project and links to the project was implemented during the formal comment period, and a post sharing the video was boosted for five days as a display ad targeting Facebook users living in Champaign, Urbana, and Savoy or within a 25-mile radius of each. The postcard, mailing list press release, news articles, and social media posts are included in Appendix H.

The project advertising and social media campaign resulted in a total reach of approximately 7,500 people. Table 14 outlines the detailed results of the online engagement.



## 6. PUBLIC OUTREACH AND AGENCY COORDINATION

**Table 14. Social Media Engagement for Virtual Public Meeting**

YouTube	Facebook	Twitter
		
<ul style="list-style-type: none"> <li>1 presentation video <ul style="list-style-type: none"> <li>226 views</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>1 presentation video <ul style="list-style-type: none"> <li>219 views exceeding 15 seconds</li> </ul> </li> <li>8 posts with graphics <ul style="list-style-type: none"> <li>Reach (number of unique people who saw Project content): 4,454</li> <li>Engagement (Likes/Comments/Shares): 315</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>8 tweets with graphics <ul style="list-style-type: none"> <li>Impressions (times people saw the tweets): 2,898</li> <li>Engagement (likes, clicks, retweets): 179</li> </ul> </li> </ul>

A total of eight written comments were submitted through the website comment form or the project email address. Additionally, FTA received a telephone call and directed the individual to the Project website. Comments included support for the project, aesthetics of the mixed-use structure, environmental justice and outreach, and safety. Questions submitted related to funding, pickup and drop off locations, landscaping, and funding. Responses to questions were posted on the Project website.

Outreach will continue through publication of the Environmental Assessment.

### 6.2. Environmental Justice Outreach

MTD's goal is to prevent discrimination through the impact of its programs, policies and activities. The following tasks will be undertaken prior to the online public meetings:

- Offer Americans with Disability Act accommodations for virtual outreach advertising.
- Provide requested accommodations upon advance request.
- Provide notice to community- and faith-based organizations, educational institutions, and other organizations to implement public engagement strategies that reach out specifically to members of affected EJ communities.

Approximately 8 percent of individuals within the ½-mile EJ Study Area speak English less than very well, ranging from 2.1 percent to 18.7 percent within individual census tracts.

Translations must be provided in each LEP language group that is 5% or 1,000 people (whichever is less) of the total population eligible to be served. Providing these translations shows compliance and provides a "safe harbor" for transit providers that receive federal funding. Following an evaluation of the Project Area's demographic data related to LEP, it was determined there are no individual LEP language groups within the Project Area Census Tracts that meet the threshold of five percent of the population or 1,000 people. Translated materials will be provided upon request.

## 6. PUBLIC OUTREACH AND AGENCY COORDINATION

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MTD also continues direct outreach to the directors of the Inman Place Independent Living and Senior Facility and Champaign County Continuum of Service Providers to the Homeless to ensure awareness of the Project and coordinate regarding potential construction impacts and mitigation.

### 6.3. Agency Coordination

Agency outreach for the proposed Project included coordination with a variety of federal, state, and local agencies as well as Native American tribes. Outreach efforts were conducted in compliance with NEPA and other applicable regulations, including but not limited to, Section 106 of the NHPA, Section 4(f) of the U.S. Department of Transportation Act of 1966, joint guidance and regulations from FTA and FHWA, and other agency regulations and guidelines.

#### 6.3.1. Federal, State, and Local Agency Coordination

The Project team initiated contact with and solicited feedback from several local officials throughout the EA period. Formal mailings and virtual on-demand outreach was focused on confirming Project understandings at this stage of the project. Local officials were notified and invited to take part in the Project are listed in Appendix H.

#### 6.3.2. Section 106 Coordination

FTA initiated Section 106 consultation with the Illinois SHPO by submitting a draft APE on October 15. After concurrence from the SHPO on the APE, methodology, and a list of consulting parties, FTA formally invited the following consulting parties to participate in Section 106 consultation.

- City of Champaign, Office of the Mayor
- City of Champaign, Council District 1
- City of Champaign, Council District 2
- City of Champaign, Council District 4
- City of Champaign Historic Preservation Commission
- Champaign County History Museum
- Illinois Heritage Association
- Preservation and Conservation Association of Champaign County
- Citizen Potawatomi Nation, Oklahoma
- Forest County Potawatomi Community of Wisconsin
- Hannahville Indian Community, Michigan
- Kickapoo Tribe of Indians of the Kickapoo Reservation in Kansas
- Kickapoo Tribe of Oklahoma
- Menominee Indian Tribe of Wisconsin
- Miami Tribe of Oklahoma
- Osage Nation
- Prairie Band Potawatomi Nation

A response was received from the Miami Tribe of Oklahoma to participate as a consulting party.

# 7. Preparers

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### Organizations and Persons Consulted

Core Spaces: Jonathan Kubow

City of Champaign: T.J. Blakeman

Champaign Urbana Urbanized Area Transportation Study (CCRPC): Shuake Wuzhati and Rafsun Mashraky

U.S. Fish and Wildlife Service (IPaC)

Illinois Department of Natural Resources (EcoCat)

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