



ILLINOIS
TERMINAL
EXPANSION

AT THE YARDS
CHAMPAIGN

Environmental Justice Technical Memorandum

Illinois Terminal Expansion at the
Yards

Champaign-Urbana Mass Transit
District

Champaign, Illinois

October 2020



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Technical Memorandum

1.0 Purpose of Memorandum

The Champaign-Urbana Mass Transit District, as project sponsor to the Federal Transit Administration (FTA) proposes to renovate and expand Illinois Terminal to improve safety and accessibility, increase capacity, enhance livability, and advance local economic development goals.

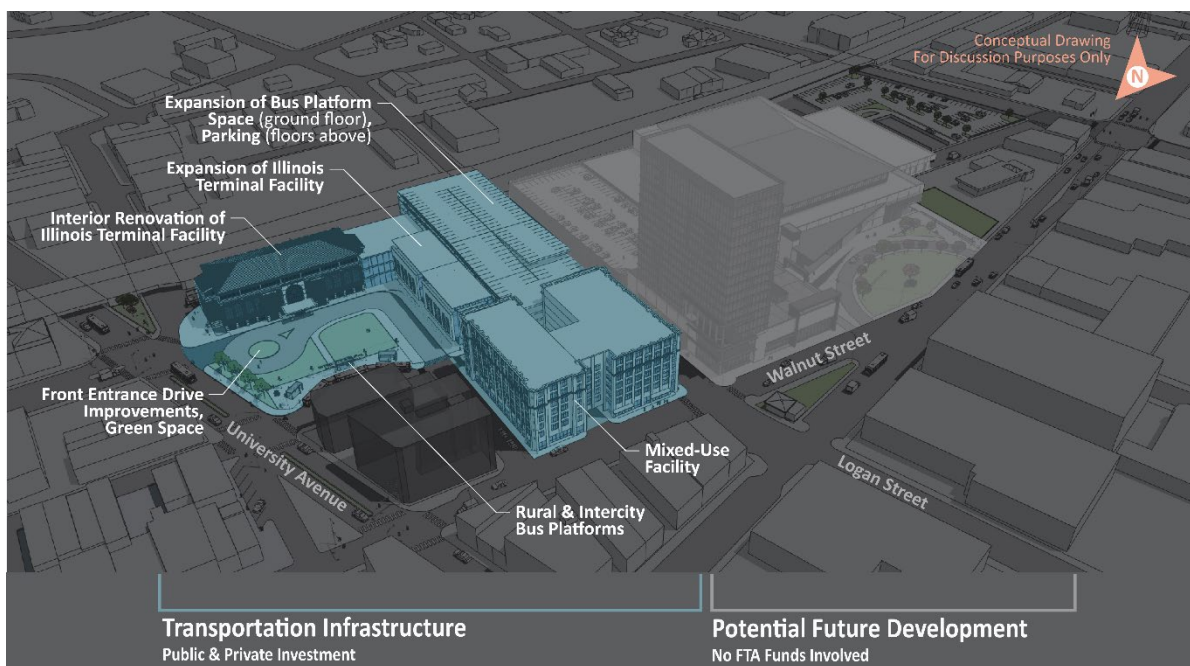
This memorandum describes the potential impacts of the proposed Illinois Terminal Expansion Project (Project) on Environmental Justice (EJ) populations present near the Project Area in Champaign County, Illinois. An EJ population is defined as minority and low-income by federal regulations and the State of Illinois' Environmental Justice Act includes elderly populations. The intent of this analysis is to determine whether EJ populations would experience adverse impacts disproportionately to non-EJ populations.

2.0 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



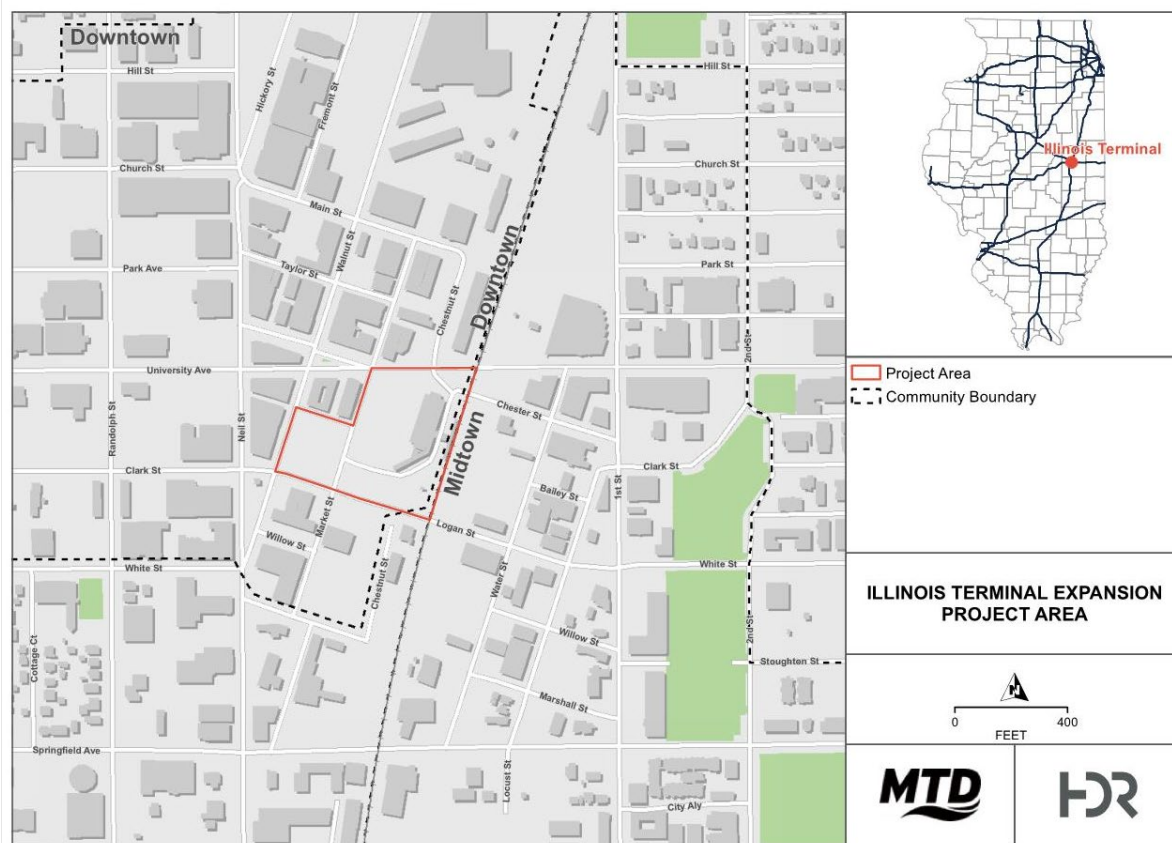
Source: Ratio Architects 2020

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.

Illinois Terminal is located at 45 East University 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



Source: HDR 2020

3.0 Legal/Regulatory Context and Methodology

The analyses presented in this memorandum 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)
- USDOT 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).
- EO 13166, Improving Access to Services for Persons with Limited English Proficiency
- 415 ILCS 155, Environmental Justice Act

As outlined in FTA Circular 4703.1, USDOT 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 Project.
2. If EJ populations are present, consider the potential effects of the Project on the EJ population, including any disproportionately high and adverse effects.
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 also 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 takes into account 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.
- Indirect impacts would be caused by the 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. A Study Area encompassing an 0.25-mile radius of the Project Area was assessed for potential indirect or cumulative impacts on EJ populations affected by the proposed Project.

4.0 Existing Conditions

4.1. Race and Ethnicity

There are 4,529 people living within the Study Area. As shown in Table 1, 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.

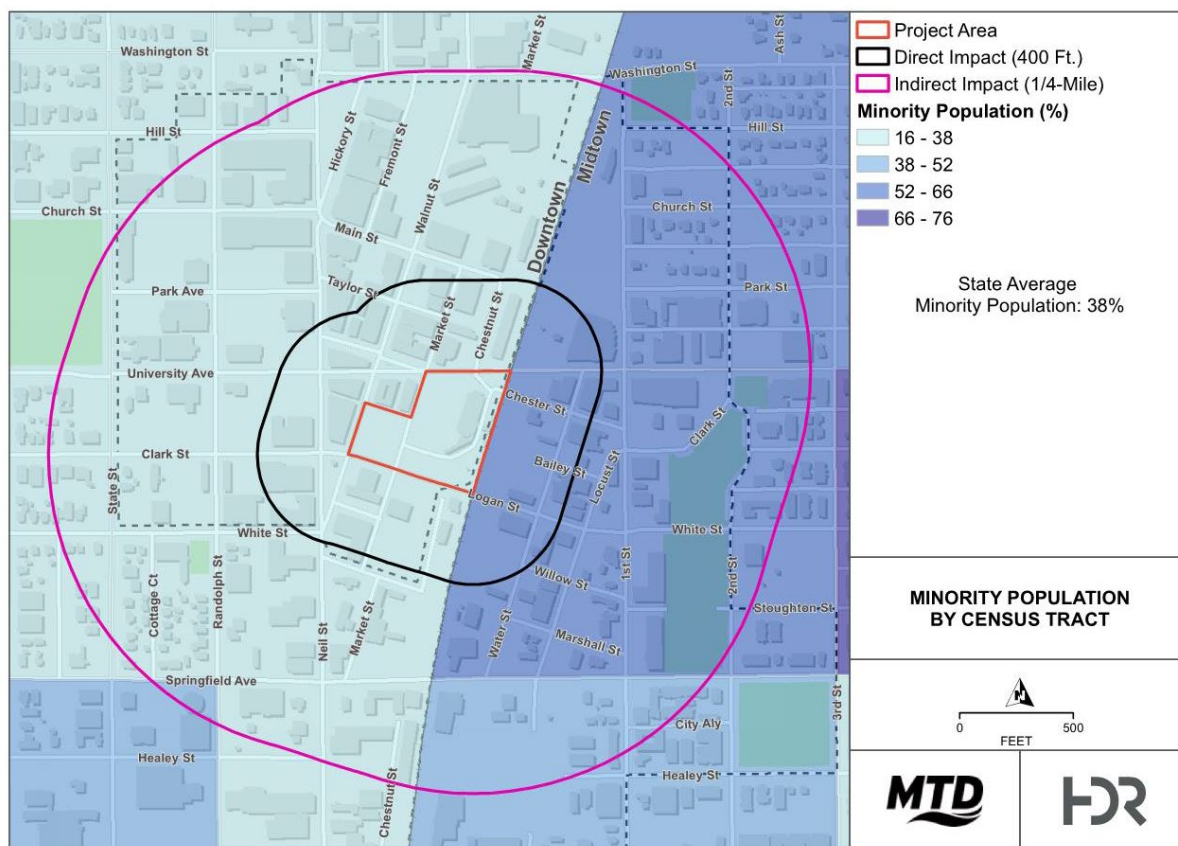
Table 1. Race within the Study Area

Race/Ethnicity	Total Population	Percent of Total Population
Total Population	4,529	100.00%
Not Hispanic or Latino:	4,163	91.9%
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%
Hispanic or Latino:	366	8.1%
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:	-	-
Minority (Non-White)	2,095	46.3%
Non-minority (White, Not Hispanic or Latino)	2,434	53.7%

Source: U.S. Census Bureau, 2018 ACS 5-Year Estimates

Geographically, minority populations within the Study Area are not dispersed equally. Figure 3 shows the distribution of the minority population throughout the Study Area. 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 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 six 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 2 buildings currently being renovated as a mixed-use development that would ultimately include 10 market rate apartments, restaurant, and outdoor gathering space.

Figure 3. Minority Population within the Study Area



4.2. Income and Poverty

Incomes the Study Area vary widely, as shown in Table 2. 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.

Table 2. Population by Income to Poverty Level Ratio

Ratio of Income to Poverty Level	Block Groups within the Study Area		State of Illinois	
	Total	Percent of Total Population	Total	Percent of Total Population
Total Population	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%
Low-Income	1,744	38.7%	1,635,603	13.1%
Non-Low-Income	2,761	61.3%	10,887,680	86.9%

Source: U.S. Census Bureau, 2018 ACS 5-Year Estimates

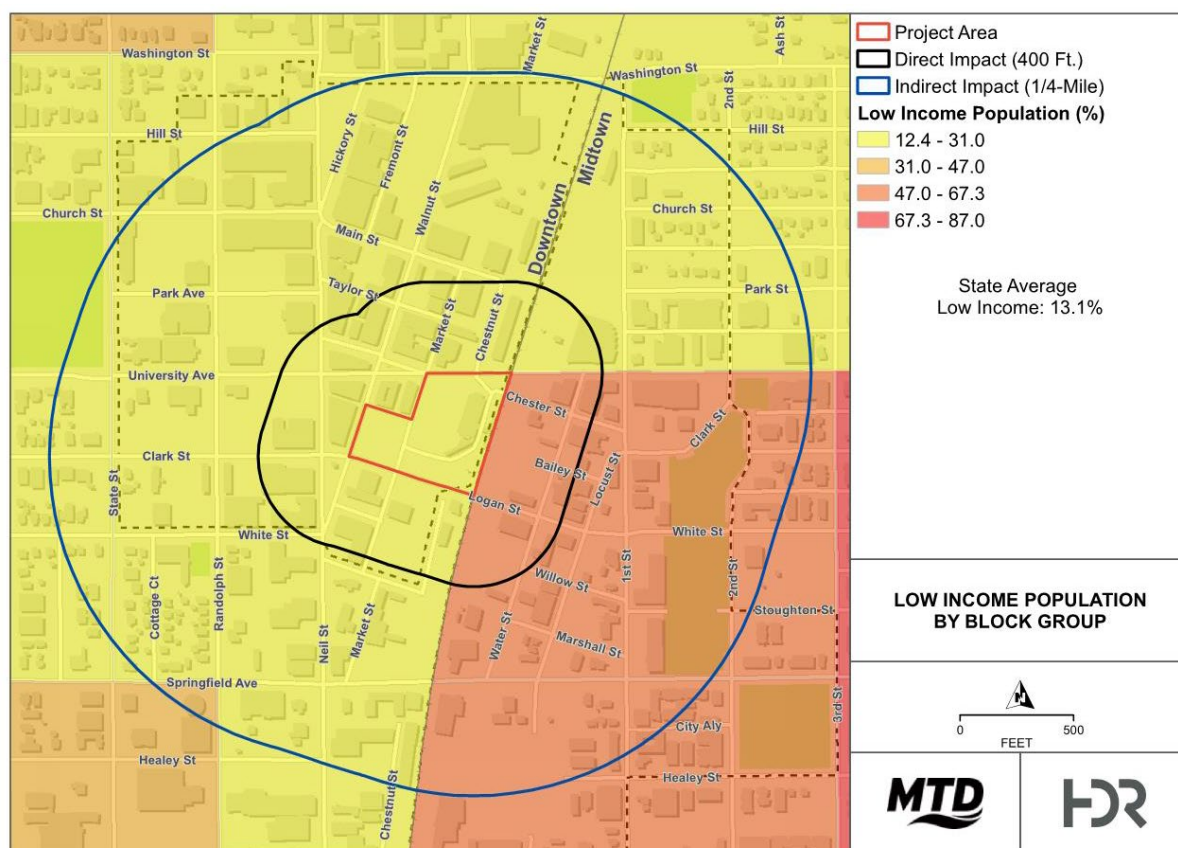
As shown in Figure 4, low income populations are more concentrated to the east of the Project Area. As noted with the minority population distribution, there are fewer than eight residential units within the of direct impact areas, to the east of the Project Area. While the block groups within Study 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, indicating that the residents in this area 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.

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.

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.

Figure 4. Low Income Population within the Study Area



4.3. Elderly and Disabled Population

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 3. 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.

Table 3. 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

4.4. Conclusion

As indicated in Figure 3 and Figure 4, census blocks within the Study Area include minority and low-income EJ populations. There are not 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, a community with accessibility adaptations, and an undefined number of persons experiencing homelessness within the Study Area.

5.0 Impacts

The following sections summarize the potential for disproportionate impacts and benefits as a result of the proposed Project.

5.1. No Build Alternative

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

5.2. 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 community would enjoy safer access and pedestrian circulation at Illinois Terminal, increased reliability and enhanced access to transit to access community facilities, major activity centers, health services, and employment would benefit the entire community.

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 congruent 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 will coordinate directly with Inman Place administration about the 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 CAA. There would be no permanent impacts to EJ populations related to air quality.

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.

The indirect and cumulative impacts of the Build Alternative would not be disproportionate to the EJ populations within .25 mile of the Project Area. Induced infill and increased density in the Downtown core are not anticipated to result in significant displacements because underutilized surface parking lots and industrial buildings are available for infill developments. Benefits related to economic development, job growth, and a growing visiting population would be dispersed throughout the project area and would be experienced equally by EJ and non-EJ communities. Based on the past, present, and foreseeable future trends, community facilities are not declining resources and long range planning identifies increases in public spaces. No adverse cumulative impacts are anticipated for these resources.

Improvements would result in improved reliability and improved access to community facilities, major activity centers, and employment. Benefits include housing, commerce, and employment opportunities. All populations throughout the Downtown core would experience the benefits of the Build Alternative. Mobility benefits would likely be more important to those passengers with disabilities, low-income populations, and the elderly. Many EJ populations share these characteristics and would likely value the relative importance of mobility improvement to a greater degree than would non-EJ populations, who may have more travel options available. The project would offer all populations, including elderly, minority and low-income populations, safer access to buses, more comfortable amenities, and more reliable service provided by MTD and intercity and rural services and Amtrak. Based on the analysis and the mitigation commitments made by MTD and its Joint Development Partners, the Build Alternative would not result in substantial environmental impacts. As a result, the Build Alternative would also not result in disproportionately high and adverse effects on minority, low-income, aging, or disabled populations.

Construction Impacts

The Build Alternative would result in temporary adverse construction impacts on neighborhoods surrounding the project. No disproportionately high and adverse impacts to minority and low income EJ populations due to construction are anticipated, because impacts would be temporary and would be experienced by EJ and non-EJ communities alike; however, the Inman Place Independent Living and Senior Facility would experience direct temporary impacts related to noise, vibration, dust, and air quality, which would be mitigated. Construction activities for the Build Alternative would last up to approximately 12 months.

6.0 Measures to Avoid or Minimize Harm

During the design of the 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 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 of the Environmental Assessment, 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 the Champaign Urbana Canteen Run to temporarily relocate supply distribution, if needed. During construction, the Project contractor would be required to prepare a plan for construction that outlines construction best management practices (BMP) 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.

As discussed further in Section 4.14, the contractor will be required to prepare a plan to mitigate construction noise and vibration. At a minimum, the plan would include the following:

- Identification of the proposed Project's noise and vibration 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 document the pre-construction conditions of particularly susceptible receptors
- 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
- Process to handle and resolve any noise-related complaints

7.0 Outreach Methods and Summary

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

- 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.

MTD will also conduct direct outreach to the directors of the Inman Place Independent Living and Senior Facility to ensure awareness of the Project and open a dialogue about construction impacts and mitigation.

8.0 References

U.S. Census Bureau. 2018. American Community Survey 5-Year Estimates.