



Appendix A-8: Draft Section 4(f) and Section 6(f) Evaluation

This Draft Section 4(f) and Section 6(f) Evaluation was prepared for the Project in accordance with 49 United States Code (USC) § 303 and 23 USC § 138. It is being published with the Supplemental Final Environmental Impact Statement for review for 45 calendar days following publication. Copies of the Draft Section 4(f) and Section 6(f) Evaluation have been provided to the Officials with Jurisdiction over the affected Section 4(f) properties and to the United States Department of the Interior.

The review period for the Draft Section 4(f) Evaluation will serve as the opportunity for public comment regarding the park and recreation area Section 4(f) properties where the Federal Transit Administration (FTA) has determined that the park and recreational activities will not be adversely affected by the project; therefore, a *de minimis* impact determination is appropriate. Public comments received regarding these properties will be considered prior to finalizing impact determinations. These park and recreational properties include:

- College Park
- North Hennepin Community College athletic fields
- Tessman Park
- Wirth/Victory Memorial Pkwy Regional Trail

A Final Section 4(f) and Section 6(f) Evaluation and Section 4(f) Finding will be published with the Amended Record of Decision following the public comment period and will include comments received and responses.

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A-8. Draft Section 4(f) and Section 6(f) Evaluation

8.1 Introduction

The Council, in partnership with Hennepin County, proposes to construct a 13.4-mile light rail extension of the Blue Line, connecting the Cities of Brooklyn Park, Crystal, Robbinsdale, and Minneapolis. The Council will be seeking funding from FTA for the Project.

This report provides documentation necessary to support determinations as required by 49 USC § 303, originally enacted as Section 4(f) of the Department of Transportation Act of 1966 and referred to as “Section 4(f).” Section 4(f) states FTA cannot approve the use of publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance, or land of an historic site of national, State, or local significance unless FTA determines that there is no feasible and prudent alternative to the use of land and all possible planning to minimize harm resulting from the use has been accomplished. The Project would result in *de minimis* use of nine Section 4(f) resources and a direct use (greater than *de minimis* use) of two additional Section 4(f) resources.

This report also addresses Section 6(f) of the LWCF Act of 1965 (Section 6(f)) and Minn. Stat. 85.019, which establishes the Minnesota DNR Outdoor Recreation Grant Program. Section 6(f) of the LWCF Act requires that an area acquired or developed with LWCF assistance be continually maintained in public outdoor recreation use unless the Secretary of the Interior, via the National Park Service, approves substitution per 54 USC § 200305(f). The Project would require temporary construction activities in parkland that has received funds from these programs.

8.2 Section 4(f) Framework

This Section 4(f) documentation has been prepared in accordance with 49 USC § 303; the FTA Standard Operating Procedure (SOP) No. 18, Section 4(f) Evaluations;¹ and the FHWA Section 4(f) Policy Paper.² The FTA Section 4(f) SOP is based on the FHWA policy paper.

The Section 4(f) Policy Paper states that FTA cannot approve a transportation project that uses a Section 4(f) property unless FTA determines that:

- there is no feasible and prudent avoidance alternative to the use of land from the Section 4(f) property, and the action includes all possible planning to minimize harm to the property resulting from such use (see Section 8.2.1); or
- the use of the Section 4(f) 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 on the property (see Section 8.2.2).

Section 4(f) protects the following properties of local, state, or national significance:

- Publicly owned, publicly accessible parklands and recreational areas;
- Public wildlife/waterfowl refuges, regardless of public access; and
- Historic properties that are either listed, or are eligible for listing in, the NRHP regardless of ownership, including archaeological sites that are important for preservation in place.



8.2.1 Section 4(f) “Use” Definition

“Use” of Section 4(f) property includes:

- **Direct Use.** A direct use of a Section 4(f) property occurs when property is permanently incorporated into a proposed transportation project. This may occur as a result of partial or full acquisition of a fee simple interest, permanent easement, or temporary easement, unless the temporary easement meets the criteria for an exception (see Section 8.2.3 below).
- **Temporary Use.** A temporary use of a Section 4(f) property occurs when there is a temporary occupancy of property that is considered adverse in terms of the preservation purposes of Section 4(f).
- **Constructive Use.** A constructive use of a Section 4(f) property occurs when a transportation project does not incorporate land from the resource, but the proximity of the project results in impacts so severe that the protected activities, features, or attributes that qualify the resource for protection under Section 4(f) are substantially impaired.

8.2.2 De Minimis Use – 23 USC § 138(b)

A *de minimis* use is defined as follows:

- For parks, recreation areas, and wildlife and waterfowl refuges, a *de minimis* use is one that would not adversely affect the features, attributes, or activities qualifying the property for protection under Section 4(f), and the OWJ has concurred with this determination after there has been a chance for public review and comment (See 23 USC § 138 (b)(3)).
- For historic sites, a *de minimis* use means that FTA has determined, in accordance with Section 106 of the NHPA (54 USC § 304108), that no historic property is affected by the Project, or the Project would have “no adverse effect” on the property in question. The Section 106 consulting parties must be engaged and the OWJ (SHPO) must be notified that FTA intends to make a *de minimis* finding based on the concurrence with the “no adverse effect” determination. This is usually done in the effect determination letter sent to the OWJ for concurrence.

8.2.3 Exceptions to Section 4(f) Approval Requirements

Section 4(f) approval requirements do not apply to certain resources and conditions, including the following:

- Archaeological sites that are in or eligible for the NRHP when:
 - FTA concludes that the archeological resource is important chiefly because of what can be learned by data recovery and has minimal value for preservation in place. This exception applies both to situations where data recovery is undertaken and where FTA decides, with agreement of the OWJ, not to recover the resource; and
 - The OWJ over the resource has been consulted and has not object to FTA’s finding.
- National Historic Trails unless the trail is listed in the NRHP;
- Trails, paths, bikeways, and sidewalks that are part of the local transportation system and which function primarily for transportation; and
- Transportation enhancement activities or mitigation measures that are solely for the purpose of preserving or enhancing an activity, feature, or attribute that qualifies the property for Section 4(f) protection and the OWJ agrees.
- In addition, a temporary occupancy of property does not constitute use of a Section 4(f) resource when all the following conditions are satisfied:
 - The duration must be temporary and less than the time needed for construction of the project without change in ownership of the land;
 - Scope of the work must be minor with minimal changes to the Section 4(f) property;



- There are no anticipated permanent adverse physical effects or interference with the protected activities, features, or attributes of the property on either a temporary or permanent basis;
 - The land being used will be fully returned to a condition at least as good as that which existed prior to the project; and
 - There is a documented agreement of the OWJs over the Section 4(f) resource regarding the above conditions.
- If all of the conditions are not met, then the temporary occupancy is considered a use.

8.3 Description of the Project

8.3.1 Background

FTA issued a ROD for the Project in 2016 based on the METRO Blue Line Extension Final EIS and published a Final Section 4(f) Evaluation and an Amended Draft Section 6(f) Evaluation with the 2016 ROD. Subsequent to the issuance of the ROD, negotiations to secure needed right-of-way to allow construction of the Project in a freight rail right-of-way were unsuccessful, and the Project was modified through a route modification and design development process that resulted in the current Project Alignment.

The current Project Alignment was evaluated in a 2024 Supplemental Draft EIS, which identified only *de minimis* use of Section 4(f) resources. As a result, a Section 4(f) Evaluation was not published with the Supplemental Draft EIS. Since publication of the Supplemental Draft EIS, SHPO has determined that the modified Project would result in adverse effects on two historic resources in the Project's APE. This Section 4(f) Evaluation has been prepared to address the use of these historic resources and comprehensively evaluates the potential for use of all Section 4(f) resources affected by the Project.

A Memorandum of Agreement (MOA) between the Federal Transit Administration and the Minnesota Historic Preservation Office Regarding the METRO Blue Line Extension Light Rail Transit Project, Hennepin County, Minnesota was executed on August 23, 2016, and amended on September 20, 2022. The MOA outlines the process for changing the APE because of substantive changes to the design, completing additional historic property identification and evaluation, assessing effects on newly identified historic properties or new effects on previously identified historic properties, and identifying measures to avoid, minimize, and mitigate adverse effects on historic properties. This Draft Section 4(f) Evaluation is being published with the Supplemental Final EIS as an appendix to Chapter 8 to evaluate the Project and document compliance with the Project's Section 106 MOA. FTA has resolved the Project's adverse effects on historic resources through consultation with SHPO and consulting parties in accordance with Stipulation XIV of the MOA and will amend the MOA to reflect additional mitigation measures.

8.3.2 Purpose and Need

The purpose of the Project is to provide transit service that will satisfy the long-term regional mobility and accessibility needs for businesses and the traveling public and support the economic development goals and objectives of local, regional, and statewide plans.

8.3.3 Project Alignment and Components

The Project is proposed to run 13.4 miles generally northwest from Downtown Minneapolis, connecting North Minneapolis, the City of Robbinsdale, the City of Crystal, the City of Brooklyn Park, and surrounding communities to new opportunities and destinations. The Project would be an extension of the METRO Blue Line and would also connect to the METRO Green Line in Downtown Minneapolis. From the northern terminus in the City of Brooklyn Park, the Build Alternative includes a center-running LRT guideway on W Broadway Ave between Oak Grove Pkwy and approximately 73rd Ave N, running southeast in the median of CR 81 through the Cities of Crystal and Robbinsdale to North Minneapolis. Between Lowry Ave and Knox Ave in North Minneapolis, the center-running



guideway would continue on CR 81 before heading east on N 21st Ave, crossing over I-94, and running south on Washington Ave, southwest on 10th Ave, and southeast on 7th Ave to reach Target Field Station.

The Project would include 13 LRT stations, three park-and-rides (surface lots and parking garages), the OMF, and ancillary facilities. In the City of Minneapolis, the Project would convert two streets to transit malls with improved bicycle and pedestrian access, where general traffic would be redirected to adjacent roadways. The Project would include construction of a grade-separated interchange at Bass Lake Rd, roadway reconstructions with limited roadway expansion, and construction of new bridges (see Table A8-1 and Figure A8-1).

Table A8-1 Project Description by City

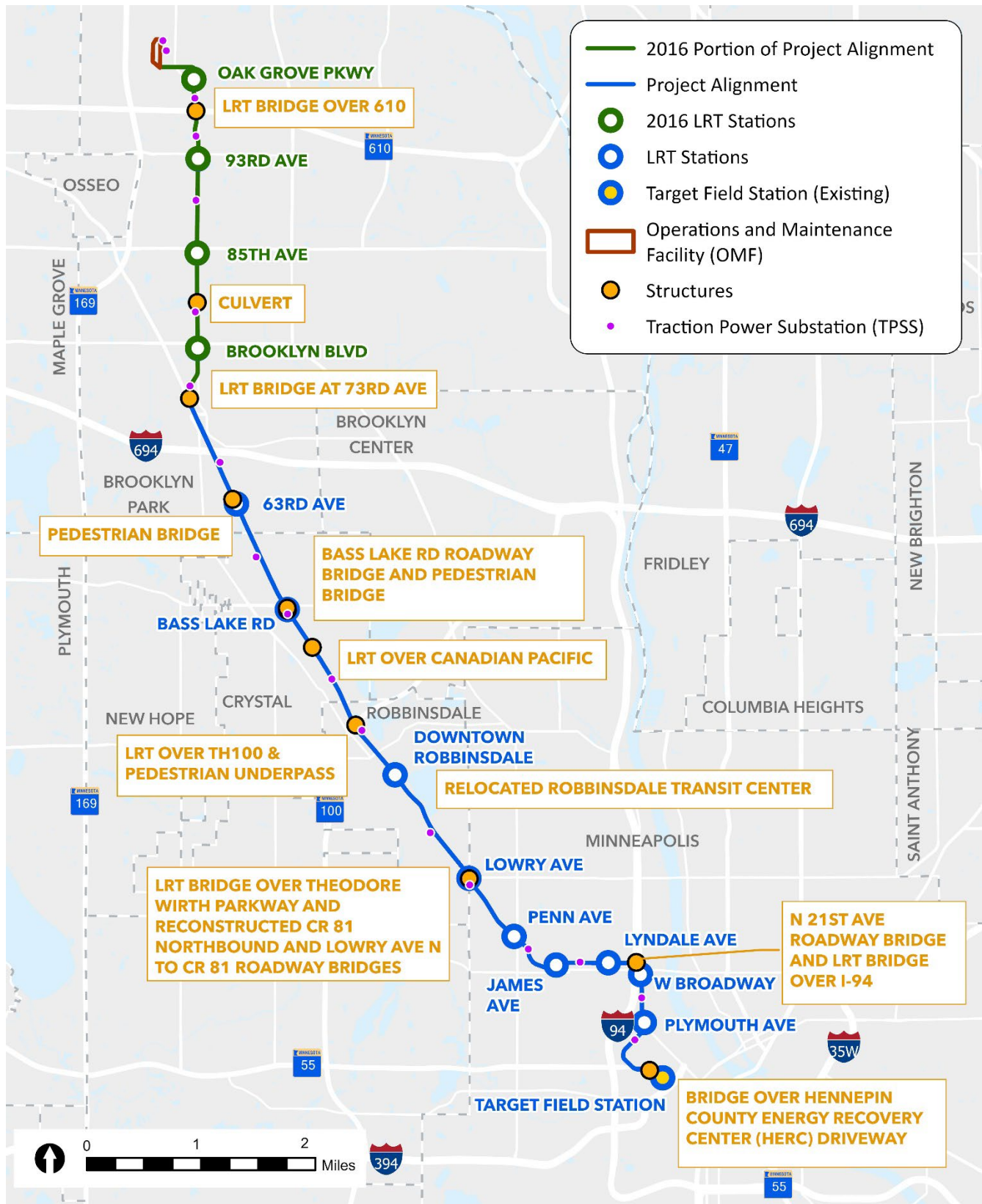
City	Alignment	Stations	Other Features
Brooklyn Park	Center running along W Broadway Ave (CR 103) from north of TH 610 to about 73rd Ave N, then transitioning to the median of CR 81	<ul style="list-style-type: none"> ■ Oak Grove Pkwy ■ 93rd Ave N ■ 85th Ave N ■ Brooklyn Blvd ■ 63rd Ave N 	<ul style="list-style-type: none"> ■ OMF north of Oak Grove Pkwy Station ■ Park-and-ride facility at Oak Grove Pkwy Station ■ Bridge from W Broadway Ave to CR 81 ■ Pedestrian bridge at 63rd Ave N Station
Crystal	Center running along CR 81	<ul style="list-style-type: none"> ■ Bass Lake Rd 	<ul style="list-style-type: none"> ■ Interchange at Bass Lake Rd with four through lanes ■ Park-and-ride facility adjacent to station
Robbinsdale	Center running along CR 81	<ul style="list-style-type: none"> ■ Downtown Robbinsdale ■ Lowry Ave (this station serves the Cities of Robbinsdale and Minneapolis) 	<ul style="list-style-type: none"> ■ Park-and-ride facility in the City of Robbinsdale downtown area (U.S. Bank site) ■ Relocated Robbinsdale Transit Center ■ Reconstruction of CR 81/Lowry Ave intersection ■ New roadway bridges; Lowry Ave N to CR 81 and reconstructed CR 81 northbound ■ New LRT bridge over grade-separated Theodore Wirth Pkwy ■ At-grade Lowry Station ■ Signalized intersection with CR 81 for Lowry Ave N and Oakdale Ave N



City	Alignment	Stations	Other Features
Minneapolis	<ul style="list-style-type: none"> ■ Center running along W Broadway Ave between Lowry Ave and Knox Ave ■ Transitions to N 21st Ave east of Knox Ave; tracks on the south side of N 21st Ave ■ Crosses I-94 on a new N 21st Ave bridge ■ Turns south to be center running along Washington Ave ■ Turns southwest to follow 10th Ave, then turns southeast on 7th Ave to Target Field Station 	<ul style="list-style-type: none"> ■ Lowry Ave (this station serves the Cities of Robbinsdale and Minneapolis) ■ Penn Ave ■ James Ave ■ Lyndale Ave ■ W Broadway Ave ■ Plymouth Ave 	<ul style="list-style-type: none"> ■ See Robbinsdale, above, for Lowry Ave Station features ■ Reconstruction of W Broadway Ave between Knox Ave N and Lyndale Ave N ■ Enhanced pedestrian and bicycle accommodations along cross streets connecting W Broadway Ave and N 21st Ave ■ New LRT and roadway bridges connecting N 21st Ave across I-94 ■ Transit/pedestrian/bicycle mall on 10th Ave between Washington Ave and N 5th St ■ Pedestrian/bicycle mall on N 21st Ave between I-94 and James Ave N



Figure A8-1 Project Alignment and Components





8.4 Identification of Section 4(f) Properties

No wildlife and/or waterfowl refuges or archaeological sites that warrant protection under Section 4(f) were identified.

8.4.1 Parks, Recreational Areas, Wildlife and Waterfowl Refuges

Various methods were used to identify publicly owned parks, recreational areas, and wildlife and waterfowl refuges near the Project and to assess the potential use of those properties. Resources located more than 350 feet from the Project Alignment were assumed to experience no potential for use. Maps, aerial photography, and local comprehensive plans were reviewed and field visits and coordination with local jurisdictions supported the identification of Section 4(f) properties. The Council identified 17 parks and recreational areas within the 350-foot study area which are listed in Table A8-2 and shown in Figure A8-2 and Figure A8-3.

Table A8-2 Parks and Recreational Areas in the Study Area

Property Name	Property Type	Location	Official with Jurisdiction	Section 4(f) Qualifying Description ^{b,d}
Park property adjacent to Rush Creek Regional Trail ^a	Park	Located north of, and parallel to, 101st Ave N between Elm Creek Park Reserve in Hennepin County and Coon Rapids Dam Regional Park in Anoka County; travels through Oak Grove Park in Hennepin County	TRPD	232.8-acre public park (6.4-mile multi-use trail)
Oak Grove Park ^c	Park	Located east of Winnetka Ave N and north of Oak Grove Pkwy, at 10251 Zane Ave N	City of Brooklyn Park	68-acre public park
College Park	Park	8233 W Broadway Ave (located west of W Broadway Ave, between 82nd Ave N and N College Park Dr)	City of Brooklyn Park	5.9-acre public park
North Hennepin Community College (NHCC) athletic fields	Recreational property	7411 85th Ave N (located east of W Broadway Ave, between N College Park Dr and Candlewood Dr)	NHCC	23-acre athletic fields on campus
Tessman Park (identified as Unnamed Park in 2016 Final EIS)	Park	Located south of NHCC Park and east of W Broadway Ave	City of Brooklyn Park	16.2-acre public park
Crystal Lake Regional Trail (CLRT)	Trail	3769 Crystal Lake Blvd (located in northeast quadrant of 35th Ave N and CR 81)	TRPD	8.6-mile multi-use trail
Trail in southwest quadrant of CR 81 and Bass Lake Rd	Trail	Trail from Becker Park to Wilshire Blvd	City of Crystal	1.5-mile multi-use trail
Becker Park ^{a, c}	Park	6225 56th Ave N (located in southwest quadrant of CR 81 and Bass Lake Rd and adjacent to the west side of the BNSF railway)	City of Crystal	12.2-acre public park
Graeser Park (park property) ^c	Park	4400 Lakeland Ave N (located north of TH 100 at CR 81)	City of Robbinsdale	1.8-acre public park
Twin Lakes Boat Launch Park	Park	CR 81 south of TH 100	TRPD	2.1-acre boat launch (public park)



Property Name	Property Type	Location	Official with Jurisdiction	Section 4(f) Qualifying Description ^{b,d}
Spanjers Park	Park	Located south of Lake Dr, between Lakeview Ave N and Lake Rd	City of Robbinsdale	4.5-acre public park
Lakeview Terrace Park/Crystal Lake Boat Ramp	Park	3769 Crystal Lake Blvd (located in northeast quadrant of 35th Ave N and CR 81)	City of Robbinsdale	26.0-acre public park
Wirth/Victory Memorial Pkwy ^c Regional Trail	Park	Victory Memorial Dr: About 2.8 miles from Lowry Ave north to 45th Ave N, then east to Webber Pkwy Theodore Wirth Pkwy: About 1.3 miles from Golden Valley Rd to Lowry Ave (northwest corner of Minneapolis and eastern Robbinsdale)	MPRB	About 4.1-mile linear public park with multi-use trails (165 acres)
North Commons Park	Park	1801 N James Ave (located southwest quadrant of Golden Valley Rd and N James Ave)	MPRB	25.7-acre public park
Cottage Park	Park	2100 N James Ave (located southeast quadrant of N Ilion Ave and N James Ave)	MPRB	0.5-acre public park
2105 Girard Ave N and associated parcels	Undesignated recreational property	2105 Girard Ave N	MPS	2.0-acre grassed area with playground equipment
North Loop Park	Park	Located along 3rd St N between 7th Ave and 8th Ave	MPRB	0.6-acre public park

^a Section 4(f) resource where FTA’s preliminary determination has not changed since the publication of the 2016 ROD.

^b All listed parks are publicly owned, publicly accessible, and of local significance.

^c Property developed with LWCF grant assistance or Outdoor Recreation Grant Program funding (Section 6(f) properties).

^d All acreages in this table are approximate.



Figure A8-2 Park Resources: Northern Portion of the Project Alignment

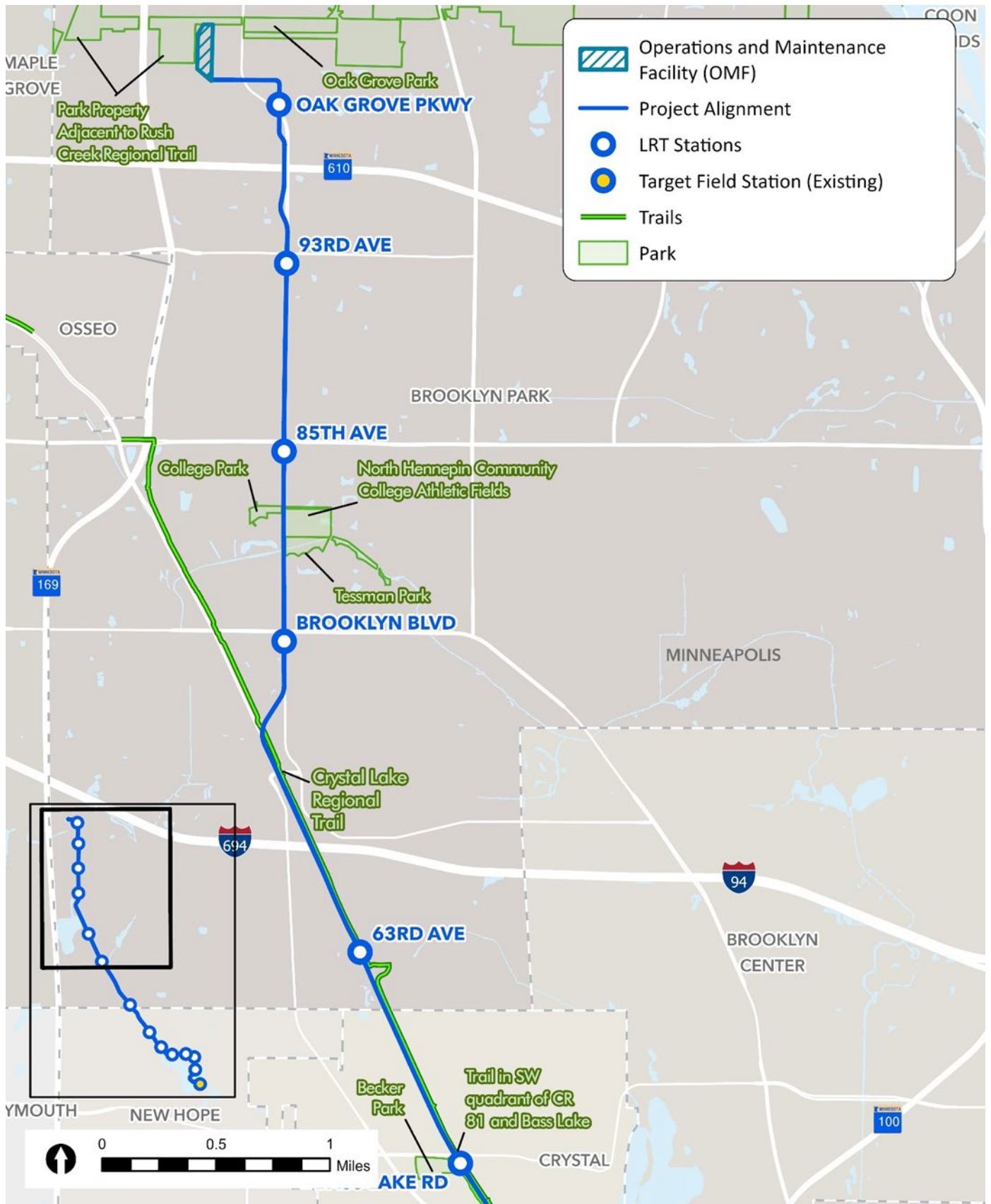




Figure A8-3 Park Resources: Southern Portion of the Project Alignment





8.4.2 Historic Properties

The study area for the Section 4(f) evaluation of historic resources is the APE defined under Section 106 of the NHPA as “the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist.” The APE was defined in consultation with the SHPO consistent with Stipulation I of the MOA. The Council identified 21 historic architectural properties in the APE (see Table A8-3, Figure A8-4, and Figure A8-5).

Table A8-3 Historic Properties within the APE

Property Name	Property Type	Location	Official with Jurisdiction	Section 4(f) Qualifying Description ^b
Minneapolis & Pacific Railway Historic District (Soo Line) ^a	Historic	City of Crystal	SHPO	Eligible for NRHP
Graeser Park (historic property)	Historic	4400 Lakeland Ave N (located north of TH 100 at CR 81), Robbinsdale	SHPO	Eligible for NRHP; 7.1 acres
West Broadway Ave Residential Historic District ^a	Historic	W Broadway Ave, between 42nd Ave N and TH 100, Lakeland Ave N to BNSF right-of-way, Robbinsdale	SHPO	Eligible for NRHP; 10.3 acres
Hennepin County Library, Robbinsdale Branch	Historic	4915 42nd Ave N, Robbinsdale	SHPO	Listed in NRHP; 0.3 acre
Guaranty State Bank of Robbinsdale	Historic	3700 W Broadway Ave, Robbinsdale	SHPO	Eligible for NRHP; 0.6 acre
Grand Rounds Historic District (Theodore Wirth Pkwy Segment ^a and Victory Memorial Dr Segment)	Historic	Cities of Minneapolis and Robbinsdale	SHPO	Eligible for NRHP; 165 acres
Pilgrim Heights Community Church	Historic	3120 Washburn Ave N, Minneapolis	SHPO	Eligible for NRHP; 1.3 acres
All Pets Animal Clinic	Historic	2727 W Broadway Ave, Minneapolis	SHPO	Eligible for NRHP; 0.2 acre
Forest Heights Addition Historic District	Historic	Bounded by 26th Ave N, Penn Ave N, Golden Valley Rd, and Humboldt Ave N, Minneapolis	SHPO	Eligible for NRHP; 151.9 acres
North Community YMCA	Historic	1711 W Broadway Ave, Minneapolis	SHPO	Eligible for NRHP; 1.5 acres
Durnam Hall	Historic	927 W Broadway Ave, Minneapolis	SHPO	Eligible for NRHP; 0.1 acre
Reno Land and Improvement Company Addition Historic District	Historic	2102-2134 Lyndale Ave N, Minneapolis	SHPO	Eligible for NRHP; 1.4 acres
Sundseth Undertaking/ Sundseth-Anderson Funeral Home	Historic	2024 Lyndale Ave N, Minneapolis	SHPO	Eligible for NRHP; 0.7 acre



Property Name	Property Type	Location	Official with Jurisdiction	Section 4(f) Qualifying Description ^b
Franklin Co-Operative Creamery Association North Side Complex (including Plant, Garage, and Barn)	Historic	2108 Washington Ave N and 2017 2nd St N, Minneapolis	SHPO	Eligible for NRHP; 1.9 acres
Control-Data Institute and Control Data – Northside Manufacturing Plant	Historic	1001 Washington Ave N and 277 12th Ave N, Minneapolis	SHPO	Eligible for NRHP; 5.5 acres
Northwestern National Bank – North American Office	Historic	615 7th St N, Minneapolis	SHPO	Eligible for NRHP; 1.0 acre
Osseo Branch, StPM&M Historic District	Historic	Cities of Minneapolis, Golden Valley, Crystal, Robbinsdale, Brooklyn Park, and Osseo	SHPO	Eligible for NRHP
Minneapolis Warehouse Historic District ^a	Historic	Bounded by 1st Ave N, 1st St N, 10th Ave, and 6th St, Minneapolis	SHPO	Listed in NRHP; 116.6 acres
Cameron Transfer & Storage Building	Historic	756 4th St N, Minneapolis	SHPO	Listed in NRHP; 0.2 acre (building only)
StPM&M/GN Historic District (Minneapolis) ^a	Historic	City of Minneapolis	SHPO	Eligible for NRHP
Saint Anthony Falls Historic District	Historic	Generally bound by 2nd St on the west side of the river; south of Plymouth Ave N and Marshall St NE on the northwest, including all of Nicollet Island; University Ave SE on the east side of the river; and 10th Ave S/6th Ave SE on the southeast, Minneapolis	SHPO	Listed in NRHP; 484.3 acres

^a Section 4(f) resource where FTA’s preliminary determination has not changed since the publication of the 2016 ROD.

^b All acreages in this table are approximate.



Figure A8-4 Architecture/History APE and Historic Sites: Northern Portion of the Project Alignment

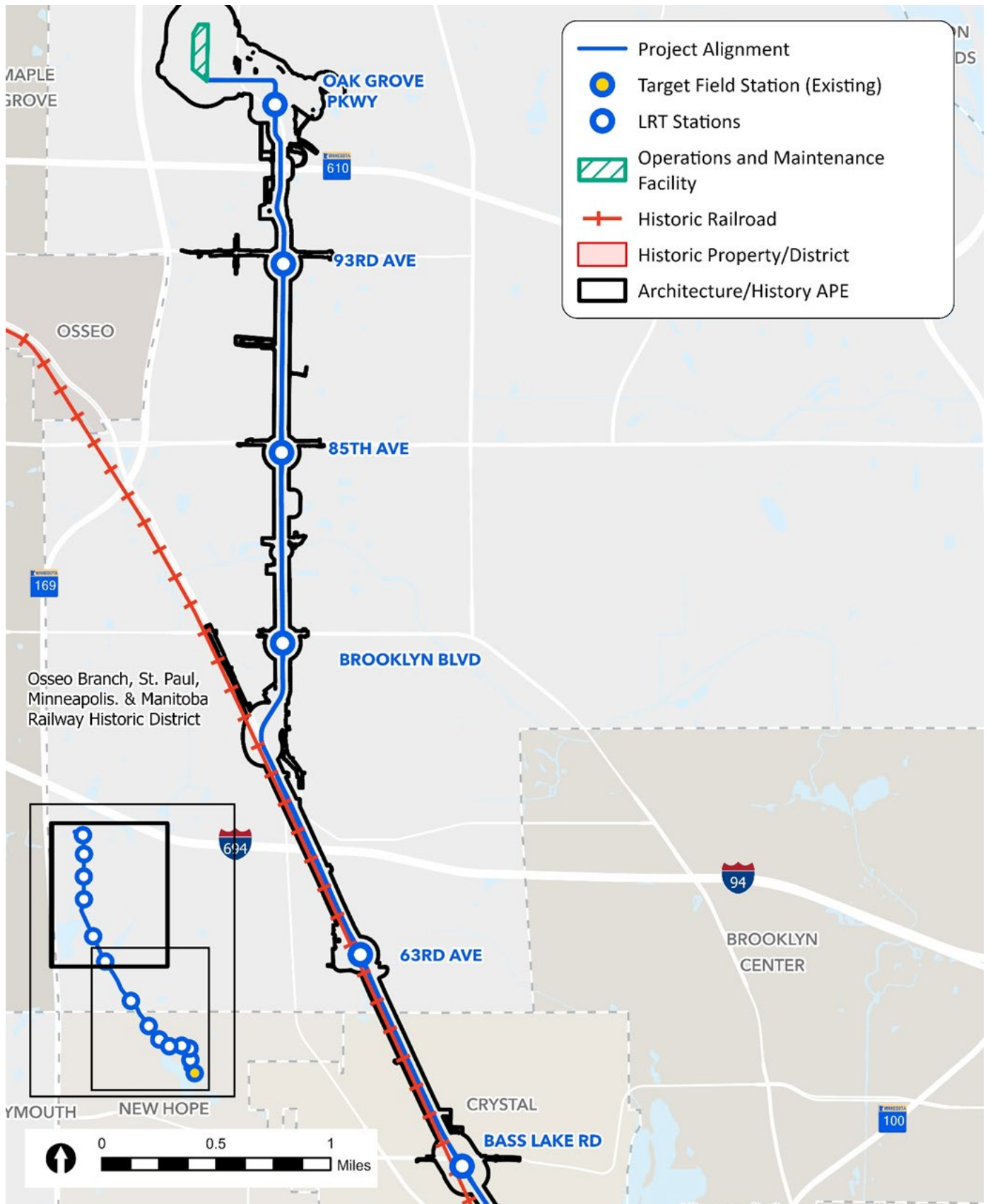
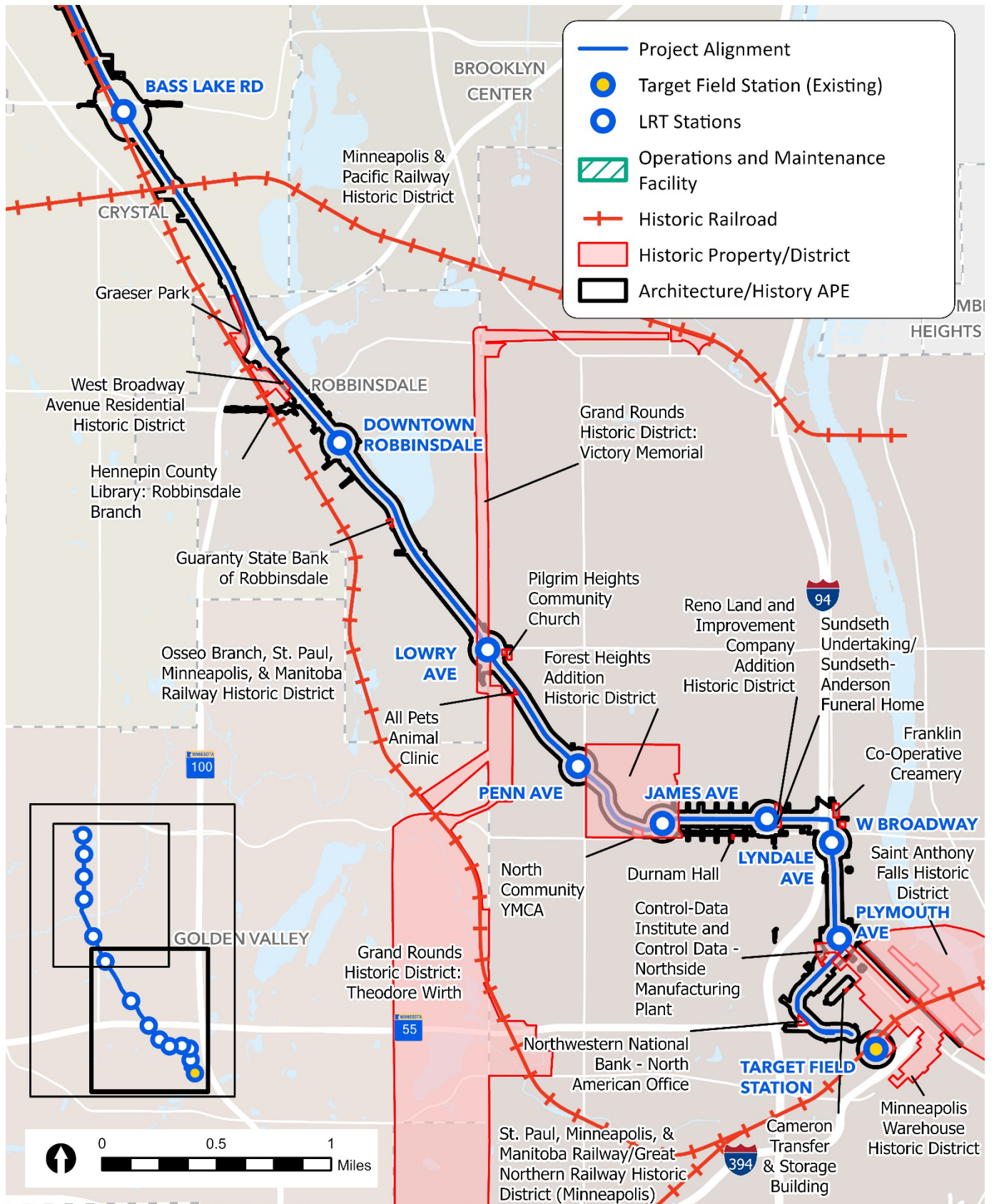




Figure A8-5 Architecture/History APE and Historic Sites: Southern Portion of the Project Alignment





8.5 Description and Use of Section 4(f) Properties

The following sections describe use of Section 4(f) properties. Property acquisition would be needed in areas along the Project Alignment where the right-of-way is too narrow to accommodate the LRT infrastructure, and the bicycle and pedestrian lanes planned as part of the Project. Property ownership boundaries and construction limits of disturbance shown in the Conceptual Engineering Drawings (see Appendix A-E) were evaluated to determine the potential for a Section 4(f) direct use (greater than *de minimis* use) and temporary occupancy. Based on the analyses in the Supplemental Final EIS, FTA has determined that constructive use of Section 4(f) resources would not occur since the Project would not result in effects so severe that the protected activities, features, or attributes that qualify the resources for protection under Section 4(f) would be substantially impaired.

Of the 17 parks/recreational areas in the study area, FTA has determined that no use would occur at 13 properties; the temporary occupancy exception conditions would be met at 7 of those properties and the remaining 6 properties are not within the Project’s construction footprint. At the remaining 4 parks/recreational areas, FTA has preliminarily determined that the Project would result in *de minimis* impacts (see Section 8.5.1).

Of the 21 historic properties in the APE, no use would occur at 14 properties; the temporary occupancy exception conditions would be met at 7 properties and the remaining 7 properties are not within the Project’s construction footprint. At the remaining 6 historic properties, the Project would result in *de minimis* impacts at 5 and Section 4(f) use at 2 historic properties (see Section 8.5.2).

Table A8-4 summarizes the Section 4(f) findings made by the Council and FTA. The description and use of Section 4(f) parks and recreation areas, and historic properties, are described in detail in Sections 8.5.1 and 8.5.2, respectively.

Table A8-4 Use of Section 4(f) Properties

Section 4(f) Property	Property Type	Official with Jurisdiction	Direct Use	<i>De minimis</i> Use	No Use
Park property adjacent to Rush Creek Regional Trail ^a	Park	TRPD			Yes, temporary occupancy
Oak Grove Park ^{b, d}	Park	City of Brooklyn Park			Yes
College Park ^a	Park	City of Brooklyn Park		Yes	
NHCC athletic fields ^d	Recreation property	NHCC		Yes	
Tessman Park (identified as Unnamed Park in 2016 Final EIS) ^a	Park	City of Brooklyn Park		Yes	
CLRT	Trail	TRPD			Yes, temporary occupancy
Becker Park ^{a, b, d}	Park	City of Crystal			Yes, temporary occupancy
Trail in southwest quadrant of CR 81 and Bass Lake Rd ^d	Trail	City of Crystal			Yes, temporary occupancy
Graeser Park (park property) ^b	Park	City of Robbinsdale			Yes
Twin Lakes Boat Launch Park	Park	TRPD			Yes, temporary occupancy
Spanjers Park ^d	Park	City of Robbinsdale			Yes
Lakeview Terrace Park/Crystal Lake Boat Launch	Park	City of Robbinsdale			Yes, temporary occupancy
Wirth/Victory Memorial Pkwy ^c Regional Trail	Park	MPRB		Yes	



Section 4(f) Property	Property Type	Official with Jurisdiction	Direct Use	De minimis Use	No Use
North Commons Park	Park	MPRB			Yes
Cottage Park	Park	MPRB			Yes
2105 Girard Ave N and associated parcels ^d	Undesignated recreation property	MPS			Yes, temporary occupancy
North Loop Park ^d	Park	MPRB			Yes
Minneapolis & Pacific Railway Historic District (Soo Line) ^a	Historic	SHPO			Yes
Graeser Park (historic property)	Historic	SHPO			Yes, temporary occupancy
West Broadway Ave Residential Historic District ^a	Historic	SHPO		Yes	
Hennepin County Library, Robbinsdale Branch ^a	Historic	SHPO			Yes, temporary occupancy
Guaranty State Bank of Robbinsdale ^d	Historic	SHPO			Yes
Grand Rounds Historic District (Theodore Wirth Pkwy Segment and Victory Memorial Dr ^a Segment)	Historic	SHPO			Yes
Pilgrim Heights Community Church	Historic	SHPO			Yes
All Pets Animal Clinic ^d	Historic	SHPO			Yes, temporary occupancy
Forest Heights Addition Historic District ^d	Historic	SHPO	Yes		
North Community YMCA ^d	Historic	SHPO		Yes	
Durnam Hall ^d	Historic	SHPO			Yes, temporary occupancy
Reno Land and Improvement Company Addition Historic District ^d	Historic	SHPO		Yes	
Sundseth Undertaking/Sundseth-Anderson Funeral Home ^d	Historic	SHPO		Yes	
Franklin Co-Operative Creamery Association North Side Complex ^d	Historic	SHPO			Yes, temporary occupancy
Control-Data Institute and Control Data – Northside Manufacturing Plant ^d	Historic	SHPO		Yes	
Northwestern National Bank – North American Office ^d	Historic	SHPO	Yes		
Osseo Branch, StPM&M Historic District ^{a, d}	Historic	SHPO			Yes



Section 4(f) Property	Property Type	Official with Jurisdiction	Direct Use	De minimis Use	No Use
Minneapolis Warehouse Historic District ^{a, d}	Historic	SHPO			Yes, temporary occupancy
Cameron Transfer & Storage Building	Historic	SHPO			Yes
StPM&M/GN Historic District (Minneapolis) ^a	Historic	SHPO			Yes
Saint Anthony Falls Historic District	Historic	SHPO			Yes, temporary occupancy

See Section 8.2 for definitions of the potential types of Section 4(f) uses.

^a Section 4(f) resource listed in 2016 ROD.

^b Property developed with LWCF Act grant assistance (Section 6(f) properties).

^c Property developed with Outdoor Recreation Grant Program funding assistance.

^d Section 4(f) resource has been added or use determination has changed since the 2024 Supplemental Draft EIS.

8.5.1 Publicly Owned Parks and Recreational Areas

This section describes the parks and recreational areas in the study area and provides the rationale for the FTA’s preliminary Section 4(f) use determinations.

8.5.1.1 Park Property Adjacent to Rush Creek Regional Trail

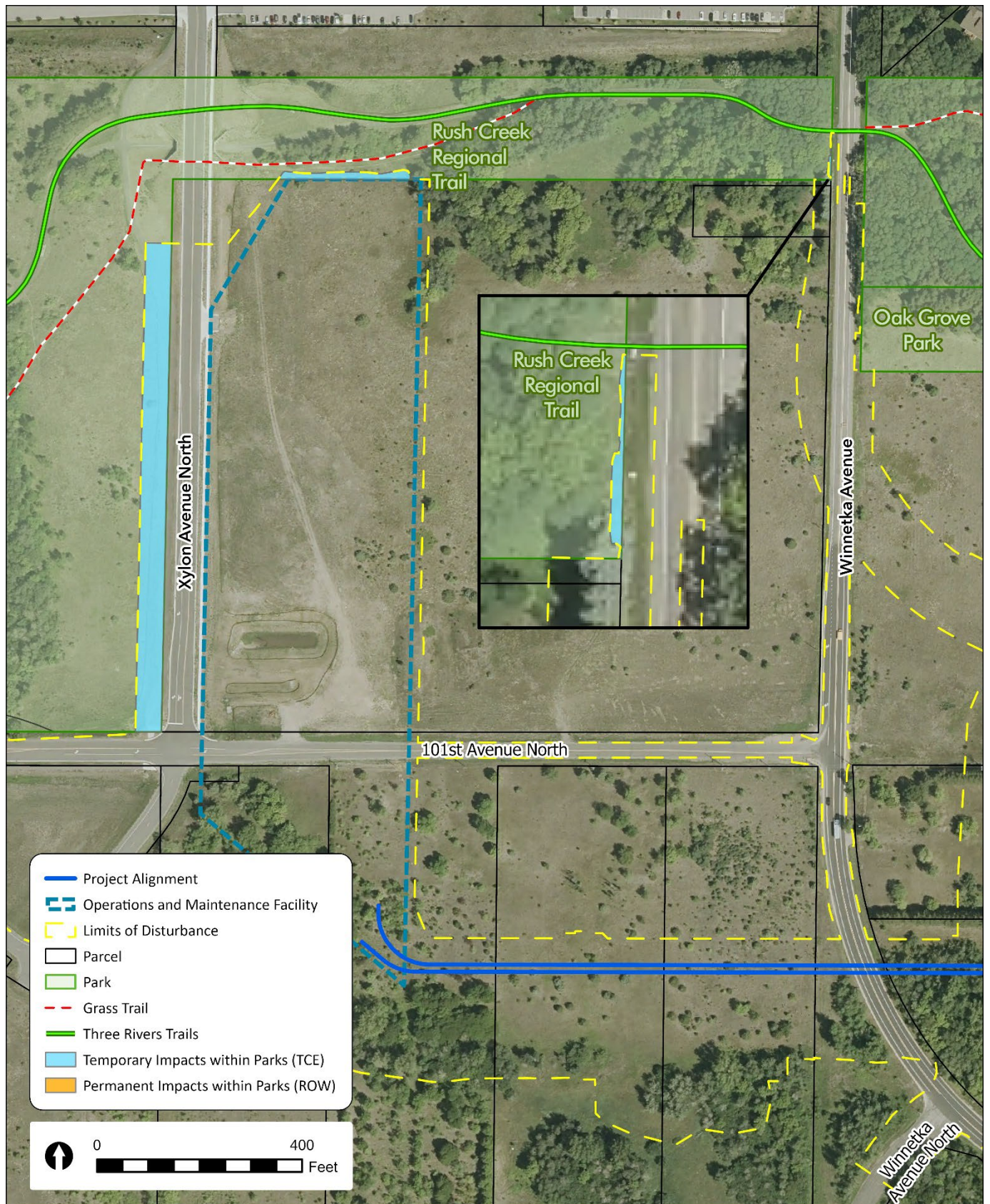
The Rush Creek Regional Trail extends approximately 6.4 miles between Elm Creek Park Reserve (Hennepin County) and Coon Rapids Dam Regional Park (Anoka County). The green space surrounding the Rush Creek Regional Trail is located north of, and generally parallel to, 101st Ave N in the City of Brooklyn Park and is approximately 233 acres. The park is on both sides of Xylon Ave N and Winnetka Ave N. The trail also travels through Oak Grove Park in the City of Brooklyn Park. Two multi-use trail properties lie within the property boundary of the park—the primary trail is a 10-foot-wide multi-use paved trail and a secondary turf trail is situated south of and roughly parallel to the paved trail. The park property and both the trails lie within property owned and maintained by TRPD.

The Project would require the temporary incorporation of 1.19 acres of the park property into the transportation right-of-way (see Figure A8-6). Temporary easements on the west side Xylon Ave N would be acquired for the realignment of the 101st Ave N and Xylon Ave N intersection and grading, construction of a fence on the north side of the OMF, and on the west side of Winnetka Ave for grading. No recreational amenities are in this portion of the park, and the park would remain open through the approximate 12-month construction period. A connection to the Rush Creek Regional Trail would be constructed at Winnetka Ave N. Construction activities would include grading work to match adjacent roadway elevations. All areas of the park property that would be affected by construction activities would be restored to existing conditions or better, and restoration plans would be developed and implemented in consultation with TRPD. The park property and trail would continue to be accessible to the public during construction.

FTA has determined that the temporary occupancy exception conditions would be met at this park, and no Section 4(f) use would result from Project implementation. The duration to realign the intersection and build the fence would be less than the time needed for Project construction, no change in ownership of the land would occur, the nature and magnitude of the changes would be minimal, no interference of protected activities would occur, and the land used would be fully returned to a condition at least as good as existing conditions.



Figure A8-6 Park Property Adjacent to Rush Creek Regional Trail





8.5.1.2 Oak Grove Park

Oak Grove Park is located east of Winnetka Ave N and north of Oak Grove Pkwy at 10251 Zane Ave N in the City of Brooklyn Park (see Figure A8-6). The park was developed using LWCF Act grant assistance; therefore, Section 6(f) also applies to this park (see Section 8.10.1 for discussion of Oak Grove relative to LWCF concerns). The 68-acre park has a turf field, horseshoe court, playground, trails, picnic area and pavilion, and restrooms. The park is under the jurisdiction of the City of Brooklyn Park.

The Project would not result in temporary or permanent incorporation of land from Oak Grove Park and the proximity of the Project would not result in impacts so severe that the protected activities, features, or attributes that qualify the resource for protection under Section 4(f) are substantially impaired. Construction activities in proximity to the park include the reconstruction of Winnetka Ave.

Existing bicycle, pedestrian, and vehicular access to Oak Grove Park would be maintained under the Project. Although the sound of the LRT system could be audible from park, the park property is not considered a sensitive noise receptor based on FTA criteria. The Project would not result in changes to the park's setting and visitors' visual experience through the introduction of the Project Alignment south of the park and the OMF west of the park.

Based on this information, FTA has determined that there would be no Section 4(f) use of Oak Grove Park as a result of Project implementation.

8.5.1.3 College Park

College Park is located west of W Broadway Ave and between 82nd Ave N and N College Park Dr in the City of Brooklyn Park. The 6-acre park has a playground, skating rink (winter), picnic pavilion, and park activity building. The park is under the jurisdiction of the City of Brooklyn Park. The Project would require the permanent incorporation of 0.05 acre (0.8 percent of the park property) and temporary incorporation of approximately 0.03 acre of College Park into the transportation right-of-way (see Figure A8-7). This permanent acquisition and temporary easement would be required for construction of the center-running LRT along W Broadway Ave and the paved right-in, right-out point of access from W Broadway Ave. Construction activities would include grading along this approximately 200-foot-long segment of roadway and construction of the access driveway over an approximate 12-month period.

The portion of park property to be permanently acquired to allow for construction of the Project is green space adjacent to the roadway and does not contain recreational amenities. All areas of the park property that would be affected by construction activities would be restored to existing conditions or better, and restoration plans would be developed and implemented in consultation with the City of Brooklyn Park. The park would remain accessible to the public throughout construction. Temporary construction activities would limit access to the park from W Broadway Ave; park patrons would need to access the park from the trail connecting to N College Park Dr or 82nd Ave N during construction adjacent to the park. Council staff would coordinate with park staff from the City of Brooklyn Park to coordinate the schedule for construction activities. Uses related to temporary changes to access would be mitigated by development of a Construction Communication Plan, which would include advance notice of construction activities. There would be no change in ownership of the park land that would be temporarily occupied.

Based on this information, FTA has determined that use of this park qualifies as a *de minimis* impact since the Project would not adversely affect the features, attributes, or activities qualifying the property for protection under Section 4(f).



Figure A8-7 College Park





8.5.1.4 North Hennepin Community College Athletic Fields

NHCC is located east of W Broadway Ave and south of 85th Ave N in the City of Brooklyn Park (see Figure A8-8). The two athletic fields are located at the southern boundary of the college campus and occupy the area east of W Broadway Ave, south of Campus Park Dr, and north of Tessman Park. The athletic fields are approximately 23 acres and contain softball, baseball, and soccer fields along with a trail along W Broadway Ave. The athletic fields are under the jurisdiction of NHCC.

Based on the current level of design, the Project would result in the permanent incorporation of 0.53 acre (2.3 percent of the park property) and a temporary easement of approximately 1.46 acres on the property. This permanent acquisition and temporary easement would be required for construction of the center-running LRT along W Broadway Ave, trail reconstruction, and floodplain mitigation (with potential tree removal). Construction activities would include grading work to match adjacent roadway elevations, trail construction, and drainage/water resources facilities.

The portion of property to be permanently acquired to allow for construction of the Project is adjacent to the ball fields and contains benches and fencing. The Project would necessitate moving or replacing the benches. The property would still be accessible to the public throughout construction, although access to the property from W Broadway Ave would be closed during construction activities adjacent to the property. Patrons would need to access the NHCC athletic fields from 85th Ave N using campus roads. Council staff would coordinate with staff from the college regarding the schedule for construction activities. Uses related to temporary changes to access would be mitigated by development of a Construction Communication Plan, which would include advance notice of construction activities.

The construction activities on the property would consist of grading work to match adjacent roadway elevations, reconstruction the trail adjacent to W Broadway Ave, and floodplain work. The areas of the property that would be affected by construction activities would be restored to existing conditions or better, and restoration plans would be developed and implemented in consultation with NHCC.

Based on this information, FTA has determined that use of this park qualifies as a *de minimis* impact since the Project would not adversely affect the features, attributes, or activities qualifying the property for protection under Section 4(f).

8.5.1.5 Tessman Park (Referred to as Unidentified Park in the 2016 Final EIS)

Tessman Park is located directly south of NHCC in the City of Brooklyn Park and extends east of Candlewood Dr N along Shingle Creek to Tessman Dr. The approximately 16-acre passive-use park consists of open-space grasslands, woodlands, wetlands, and a playground. An existing trail along the north side of Shingle Creek traverses through the park between W Broadway Ave and Candlewood Dr N and also between Hampshire Ave N and Tessman Dr. The park is under the jurisdiction of the City of Brooklyn Park.

The Project would require permanent incorporation of 0.14 acre (0.9 percent of park property) and a temporary easement of approximately 2.02 acre at Tessman Park (see Figure A8-9). Permanent acquisition and temporary easements would be required for construction of the center-running LRT along W Broadway Ave, culvert and turtle crossing for Shingle Creek under W Broadway Ave, trail reconstruction, and floodplain mitigation (possibly including tree removal). Construction activities would include grading work to match adjacent roadway elevations, trail construction, and drainage/water resources facilities. Access to the park and trail from W Broadway Ave would be closed during an approximate 12-month construction period. Park patrons would need to access Tessman Park from the trail connection at Candlewood Dr east of the Project. There would be no change in ownership of the park land that would be temporarily occupied.



Figure A8-8 North Hennepin Community College Athletic Fields





Figure A8-9 Tessman Park





The portion of park property to be permanently acquired for the Project includes wooded green space without recreational amenities. The construction activities on the park property would consist of grading work to match adjacent roadway elevations, construction of the culvert and turtle crossing under W Broadway Ave, reconnection of the trail, and tree removal for floodplain work. All areas of the park property that would be affected by construction activities would be restored to existing conditions or better, and restoration plans would be developed and implemented in consultation with the City of Brooklyn Park.

Based on this information, FTA has determined that use of this park qualifies as a *de minimis* impact since the Project would not adversely affect the features, attributes, or activities qualifying the property for protection under Section 4(f).

8.5.1.6 Crystal Lake Regional Trail

CLRT is generally parallel to and east of CR 81 between the Elm Creek Park Reserve and Memorial Pkwy, both located in Hennepin County. In the Project area, the trail travels through the Cities of Brooklyn Park, Crystal, and Robbinsdale. The 8.6-mile-long, multi-use trail uses a combination of a 10-foot-wide multi-use paved trail and local roads. The trail is on property owned by Hennepin County, the City of Brooklyn Park, the City of Crystal, and the City of Robbinsdale and is maintained by TRPD. TRPD is the OWJ over CLRT.

The Project would temporarily use CLRT for approximately 0.2 mile (900 linear feet) in the City of Brooklyn Park, 0.6 mile (3,315 linear feet) in the City of Crystal, and approximately 0.3 mile (1,410 linear feet) in the City of Robbinsdale (see Figure A8-10). In the City of Brooklyn Park (see Figure A8-11), there are three separate sections of the trail that would require temporary closures: along CR 81 at 71st Ave N, along CR 81 at the westbound I-94 ramps, and the connecting trail south of the eastbound I-94 entrance ramp. In the City of Crystal (see Figure A8-12), there are two separate sections of the trail that would require temporary closures: along CR 81 between Crystal Airport Rd and Wilshire Blvd and at the CR 81/47th Ave N intersection. In the City of Robbinsdale (see Figure A8-13), there are four separate sections of the trail that would require temporary closures: at the CR 81/47th Ave N intersection, along Lakeland Ave N south of 40th Ave N to the cul-de-sac in Lakeview Terrace Park, the connecting trail to 36th Ave N, and along Lakeland Ave N from Zenith Ave N to York Ave N. These temporary closures are required for reconstruction of portions of the multi-use paved trail and local roads. Detours would be provided to maintain trail connectivity.

A permanent route modification would occur to the CLRT near the Bass Lake Rd Station in the City of Crystal. The trail would be realigned from its current location on the east side of Bottineau Blvd between Lakeland Ave N and Bass Lake Rd. The new alignment would put the trail at sidewalk-grade along Lakeland Ave N, Colorado Ave N, and Brunswick Ave until it resumes its current alignment south of Bass Lake Rd. The new alignment places users next to local streets with lower vehicle speeds and volumes. This realignment is to accommodate the interchange at Bass Lake Rd and Bottineau Blvd. If this alignment is constructed prior to the interchange no detour would be needed for approximately 1,460 linear feet of the existing trail in the City of Crystal. However, if construction sequencing does not allow for the realignment to be constructed before the interchange construction, a detour would be provided.

The portions of CLRT to be temporarily occupied during construction would be restored to existing conditions or better, and restoration plans would be developed and implemented in consultation with TRPD. There would be no permanent impacts or change in ownership of CLRT.

The duration of the construction activities for any portion of CLRT is estimated to be approximately 12 months. The nine segments of CLRT to be temporarily closed will not all be closed and detoured at the same time. FTA and the Council would post notices regarding the temporary closures and designated detour routes on the TRPD website and at the specific trail segments affected.



FTA has determined that the temporary occupancy exception conditions would be met at this park, and no Section 4(f) use would result from Project implementation. The duration to construct the improvements would be less than the time needed for Project construction, no change in ownership of the land would occur, the nature and magnitude of the changes would be minimal, no interference of protected activities would occur, and the land used would be fully returned to a condition at least as good as existing conditions.



Figure A8-10 Crystal Lake Regional Trail (Figure 1 of 6)

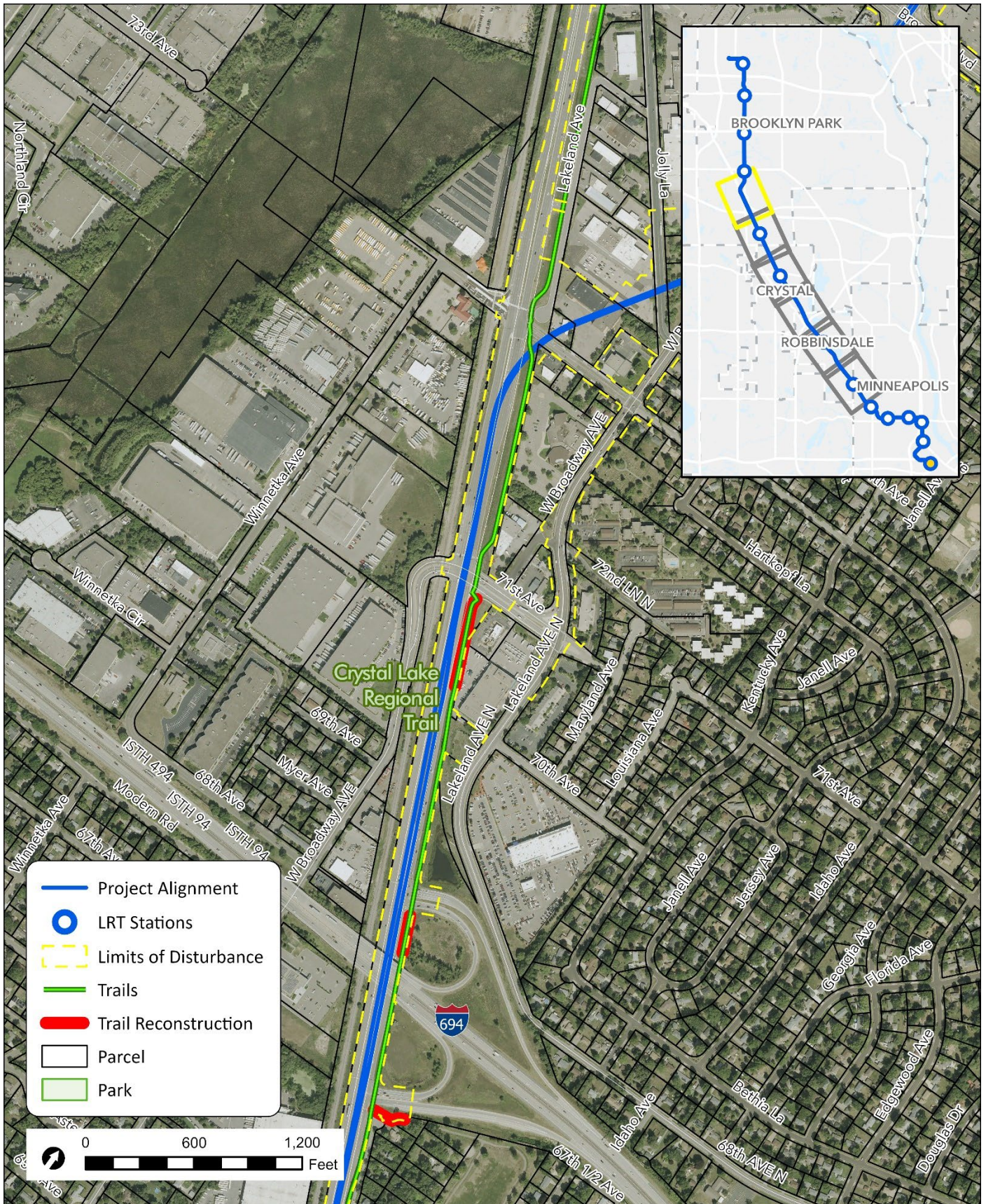




Figure A8-10 Crystal Lake Regional Trail (Figure 2 of 6)





Figure A8-10 Crystal Lake Regional Trail (Figure 3 of 6)

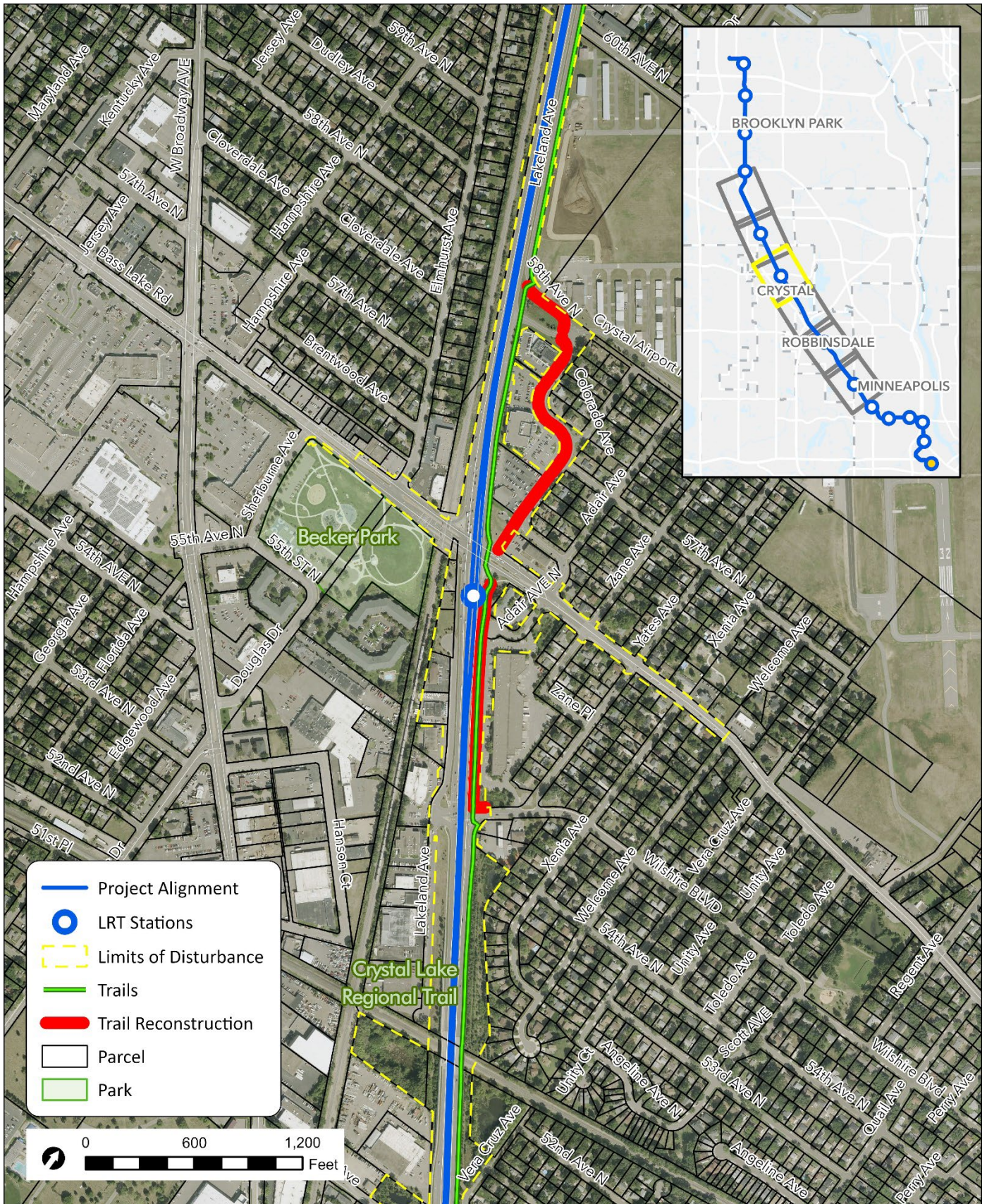




Figure A8-10 Crystal Lake Regional Trail (Figure 4 of 6)





Figure A8-10 Crystal Lake Regional Trail (Figure 5 of 6)





Figure A8-10 Crystal Lake Regional Trail (Figure 6 of 6)

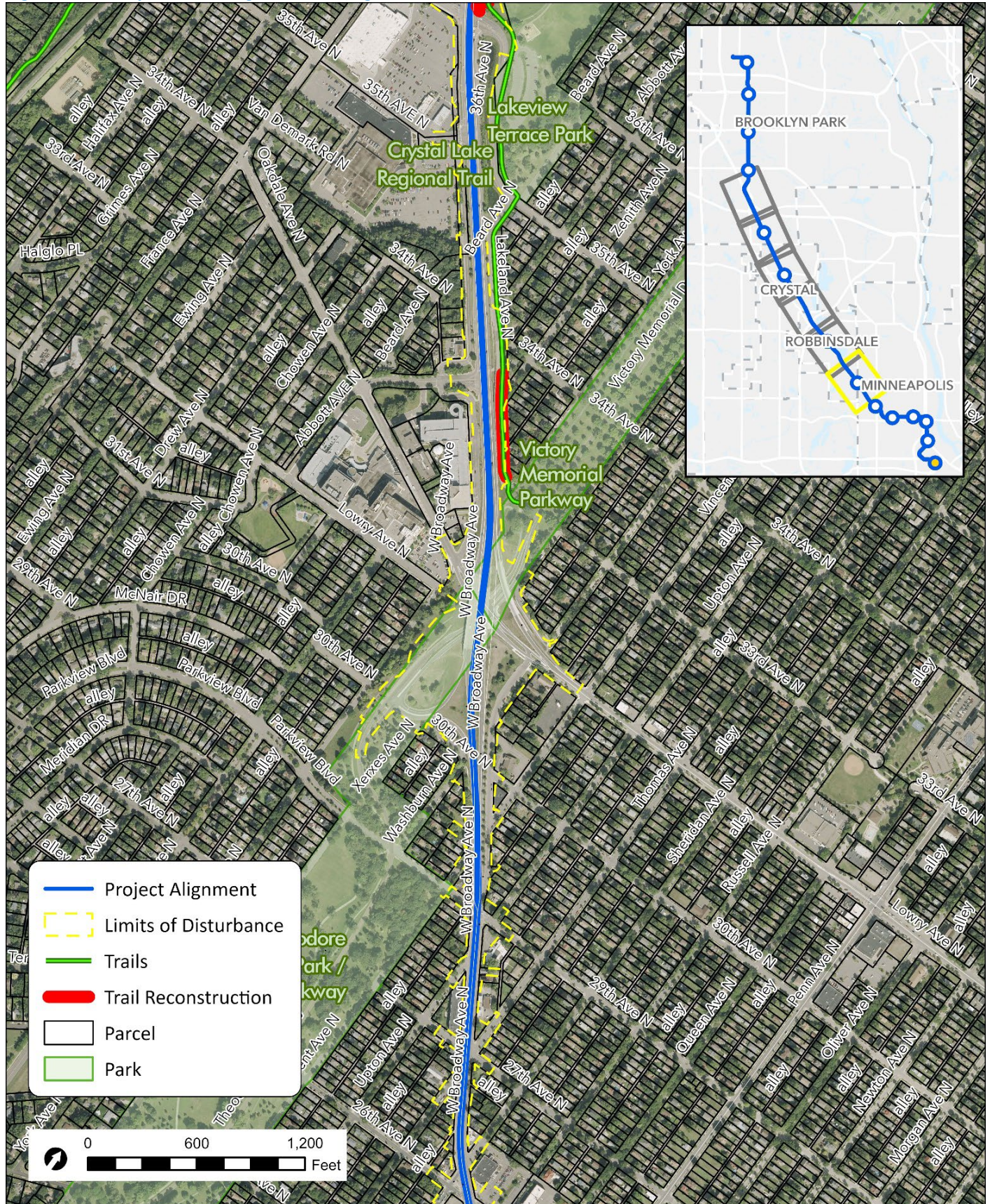




Figure A8-11 Use of Crystal Lake Regional Trail in the City of Brooklyn Park





Figure A8-12 Use of Crystal Lake Regional Trail in the City of Crystal

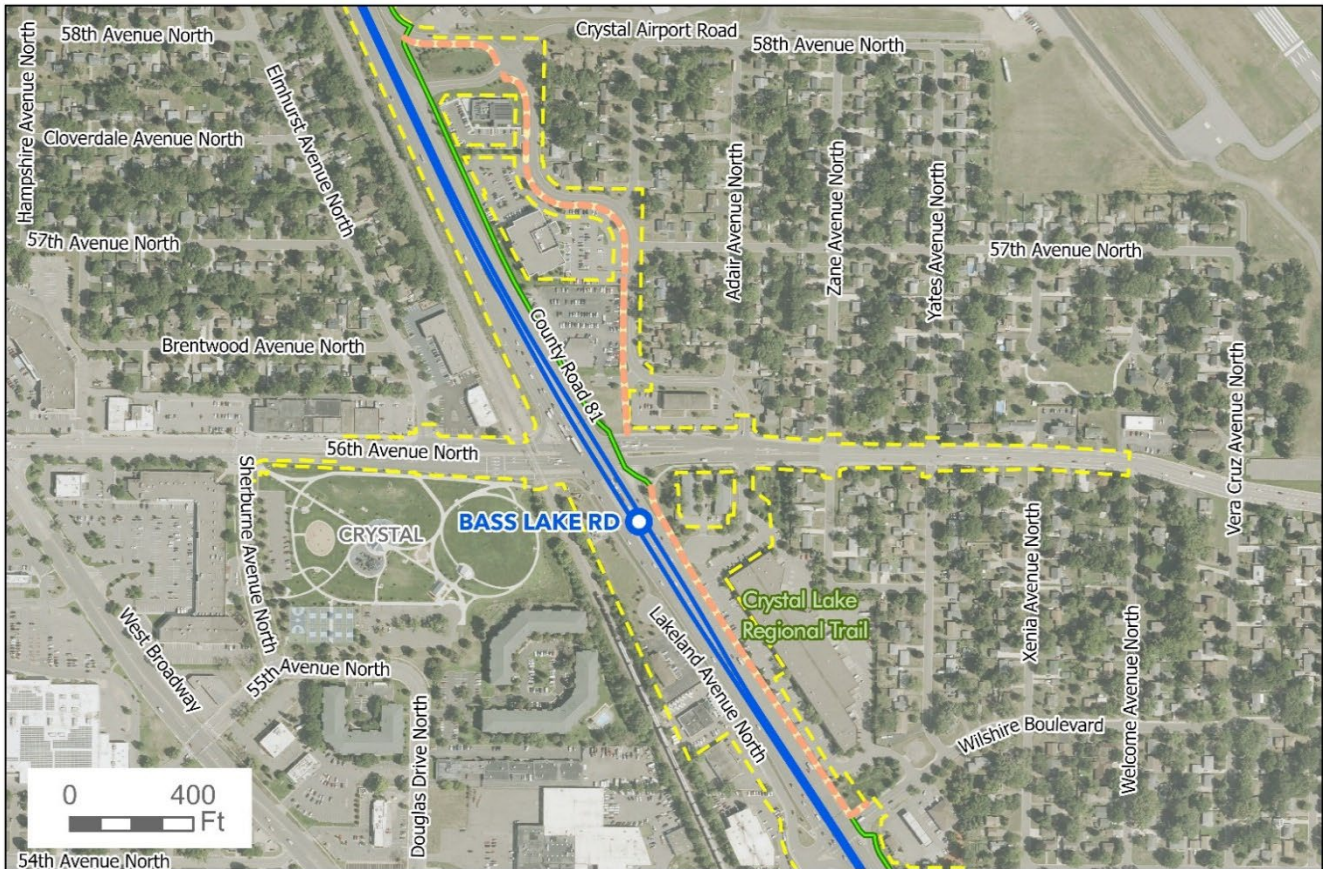




Figure A8-13 Use of Crystal Lake Regional Trail in the City of Robbinsdale (Figure 1 of 2)

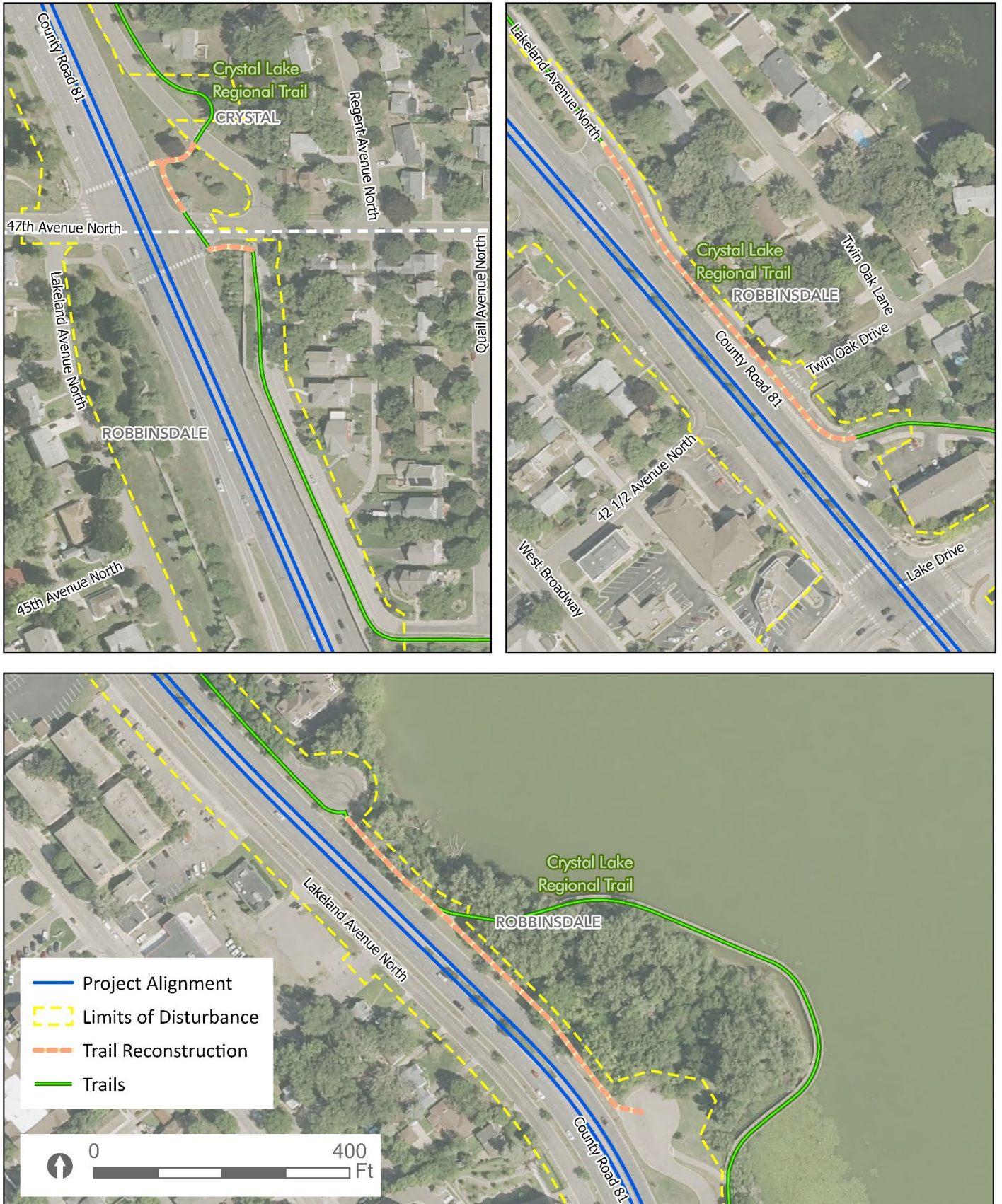




Figure A8-13 Use of Crystal Lake Regional Trail in the City of Robbinsdale (Figure 2 of 2)





8.5.1.7 Becker Park

Becker Park, owned and operated by the City of Crystal, is located in the southwest quadrant of CR 81 and Bass Lake Rd in the City of Crystal. This 12.2-acre park contains walking and biking paths; a skating rink (winter); tennis, pickleball, and basketball courts; a playground; a splash pad; and a shelter structure. Playground replacement equipment was purchased in 2018 using LWCF Act grant assistance; therefore Section 6(f) also applies to this park (see Section 8.10.1 for discussion of Becker Park relative to LWCF concerns). The eastern border of the park abuts the existing rail property west of the Project Alignment. Becker Park is accessible by automobile via two existing parking lots located off Sherburne Ave and Douglas Dr. Pedestrian and bicycle access is also provided through connections to local sidewalks and off-street trails.

The Project would require temporary occupancy of 0.04 acre of parkland (see Figure A8-14). A temporary easement would be acquired to reconstruct a portion of the trail at the intersection of CR 81 and Bass Lake Rd and to reconstruct the sidewalk ramp and relocate signal poles for a U-turn feature at Bass Lake Rd and Sherburne Ave. In the vicinity of the park, a bike route would be added along Bass Lake Rd from Yates Ave to CR 81, increasing access to Becker Park. Construction activities in the park would occur over a period of less than 6 months. All areas of the park that would be affected by construction activities would be restored to existing conditions or better, and restoration plans would be developed and implemented in consultation with the City of Crystal. The park would be accessible to the public during construction.

FTA has determined that the temporary occupancy exception conditions would be met at Becker Park and no Section 4(f) use would result from Project implementation. The duration to construct the improvements would be less than 6 months (the time needed for Project construction), no change in ownership of the land would occur, the nature and magnitude of the changes would be minimal, no interference of protected activities would occur, and the land used would be fully returned to a condition at least as good as existing conditions.

8.5.1.8 Trail in Southwest Quadrant of CR 81 and Bass Lake Rd

The trail in the southwest quadrant of CR 81 and Bass Lake Rd is located west of CR 81 and south of Bass Lake Rd in the City of Crystal east of the rail property. The 1.5-mile recreational trail and sidewalk connects Becker Park to the City of Robbinsdale. The existing 10-foot-wide trail extends from Becker Park to Lakeland Ave N where it connects to a sidewalk that parallels CR 81 and continues south to the City of Robbinsdale (47th Ave N) paralleling CR 81. The trail and sidewalk are on property owned by Hennepin County and the City of Crystal, are maintained by the City of Crystal, and are open to the public.

The Project would result in temporary closure of approximately 0.4 mile of the trail/sidewalk in the City of Crystal to reconstruct portions of the trail and sidewalk to maintain trail connectivity (see Figure A8-15). Construction activities would occur over an approximate 12-month period and include grading and paving. All areas of the trail that would be affected by construction activities would be restored to existing conditions or better, and restoration plans would be developed and implemented in consultation with the City of Crystal. Construction activity may require a detour for the trail at certain times. Council staff would coordinate with park staff from the City of Crystal to coordinate the schedule for construction activities. Uses related to temporary changes to access would be mitigated by development of a Construction Communication Plan, which would include advance notice of construction activities and any required detours.

FTA has determined that the temporary occupancy exception conditions would be met at the trail in the southwest quadrant of CR 81 and Bass Lake Rd, and no Section 4(f) use would result from Project implementation. The duration to construct the improvements would be less than the time needed for Project construction, no change in ownership of the land would occur, the nature and magnitude of the changes would be minimal, no interference of protected activities would occur, and the land used would be fully returned to a condition at least as good as existing conditions.

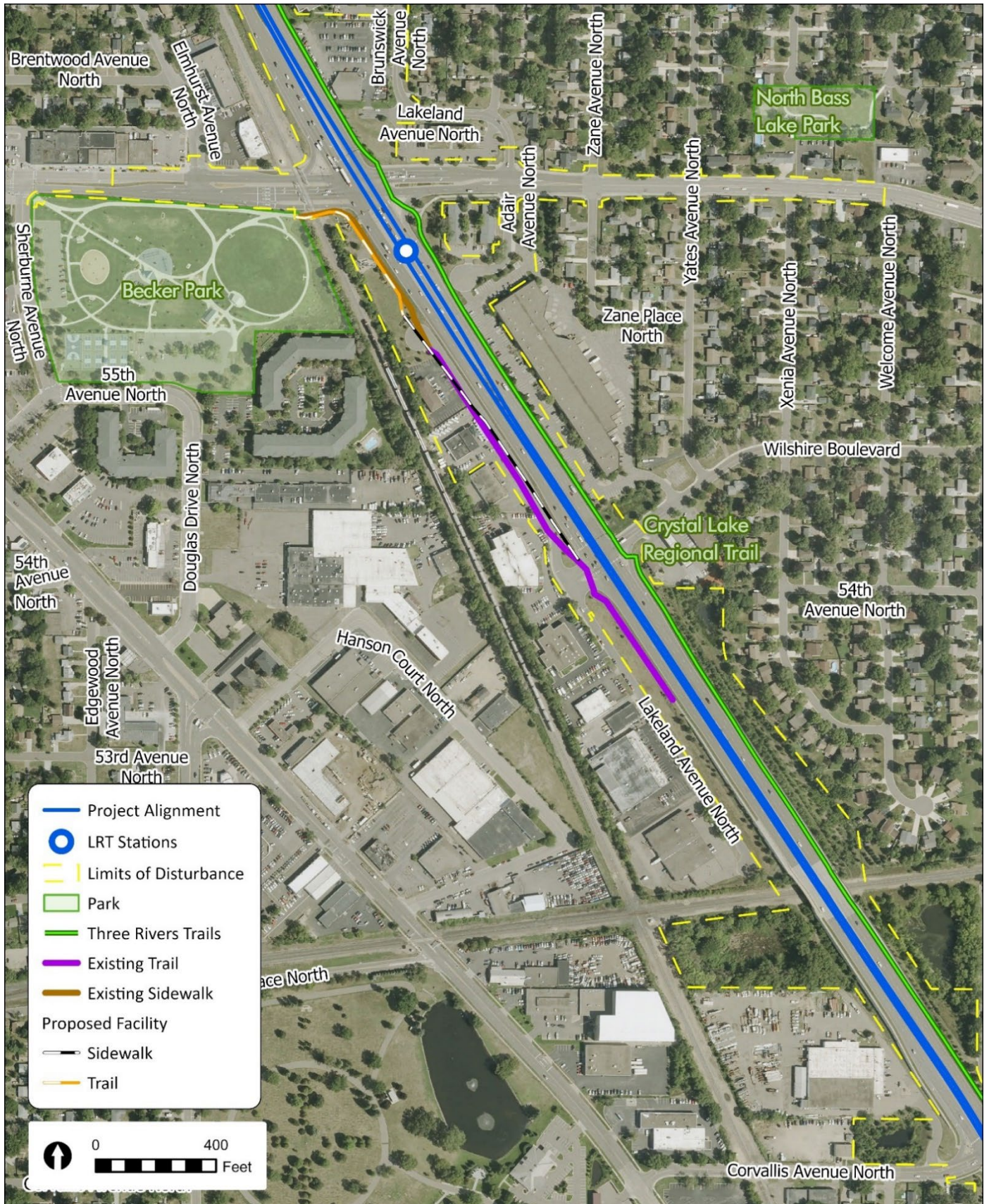


Figure A8-14 Becker Park





Figure A8-15 Trail in Southwest Quadrant of CR 81 and Bass Lake Rd





8.5.1.9 Graeser Park (Park Property)

Graeser Park, owned and operated by the City of Robbinsdale, is located west of CR 81 and north of TH 100 in the City of Robbinsdale; this 1.8-acre park includes a picnic area (see Figure A8-16). The park was developed using LWCF Act grant assistance; therefore, Section 6(f) also applies to this park (see Section 8.10.1 for discussion of Graeser Park relative to LWCF concerns). Because the park is a publicly owned, publicly accessible park of local significance, Graeser Park is considered by FTA to be a Section 4(f) protected property.

The Project would not result in permanent or temporary incorporation of land from Graeser Park, and the proximity of the Project would not result in impacts so severe that the protected activities, features, or attributes that qualify the resource for protection under Section 4(f) are substantially impaired. Existing bicycle, pedestrian, and vehicular access to the park would be maintained under the Project. Although the sound of the LRT could be audible from within the park, the park is not considered a sensitive noise receptor based on FTA criteria. The Project would result in changes in the park's setting and visitors' visual experience through the introduction of the Project Alignment east of the park. The visual changes and uses would not alter or impair the overall use or function of Graeser Park.

Based on this information, FTA has determined that there would be no Section 4(f) use of Graeser Park as a result of Project implementation.

8.5.1.10 Twin Lakes Boat Launch Park

Twin Lakes Boat Launch Park is located east of CR 81 and south of TH 100 in the City of Robbinsdale. The 2.1-acre park includes a boat launch, CLRT, and a connecting trail that travels under CR 81 (maintained by TRPD). Twin Lakes Boat Launch Park is accessible by automobile from CR 81 and Lake Dr via Lakeland Ave N. The park is under the jurisdiction of TRPD.

The Project would require a temporary easement of 0.81 acre of land from Twin Lakes Boat Launch Park (see Figure A8-17). This temporary easement would be required for construction of drainage/water resources facilities and access road reconstruction. An extension of the MnDOT-owned bicycle/pedestrian culvert under CR 81 and reconstruction of a portion of the connecting trail (maintained by TRPD) under W Broadway Ave would be constructed, requiring temporary closure of the connecting trail. A detour for the connecting trail would be provided to maintain connectivity. CLRT (discussed in Section 8.5.1.6) would be maintained.

The portion of the Twin Lakes Boat Launch Park to be temporarily occupied during construction consists of an open grassy area and the access road, which would be restored to existing conditions or better, and restoration plans would be developed and implemented in consultation with TRPD. There would be no permanent impacts or change in ownership of Twin Lakes Boat Launch Park. The park, including the boat ramp and access to the boat ramp, would continue to be accessible to the public during construction.

FTA has determined that the temporary occupancy exception conditions would be met at this park, and no Section 4(f) use would result from Project implementation. The duration to construct the improvements would be less than the time needed for Project construction, no change in ownership of the land would occur, the nature and magnitude of the changes would be minimal, no interference of protected activities would occur, and the land used would be fully returned to a condition at least as good as existing conditions.



Figure A8-16 Graeser Park (Park Property)





Figure A8-17 Twin Lakes Boat Launch Park





8.5.1.11 Spanjers Park

Spanjers Park is located south of Lake Dr between Lakeview Ave N and Lake Rd in the City of Robbinsdale. The 4.5-acre public park is located approximately 300 feet east of the Project Alignment (see Figure A8-18). Park amenities consist of a softball field. CLRT runs along the eastern edge of the park. The park is under the jurisdiction of the City of Robbinsdale. Because the park is a publicly owned, publicly accessible park of local significance, Spanjers Park is considered by FTA to be a Section 4(f) protected property.

The Project would not result in a permanent incorporation or temporary occupancy of land from Spanjers Park and the proximity of the Project would not result in impacts so severe that the protected activities, features, or attributes that qualify the resource for protection under Section 4(f) are substantially impaired. Existing bicycle, pedestrian, and vehicular access to the park would be maintained under the Project. Although the sound of the LRT system could be audible from within the park, the park is not considered a sensitive noise receptor based on FTA criteria. The Project could result in changes in the park's setting and visitors' visual experience through the introduction of the Project Alignment one block west of the park. The visual changes and uses would not alter or impair the overall use or function of Spanjers Park.

Based on this information, FTA has determined that there would be no Section 4(f) use of Spanjers Park as a result of Project implementation.

8.5.1.12 Lakeview Terrace Park/Crystal Lake Boat Launch

Lakeview Terrace Park is located east of CR 81 and north of 35th Ave N in the City of Robbinsdale. The 26.0-acre park is at the south end of Crystal Lake. Park amenities include athletic fields, a playground, a picnic area, a walking path, CLRT, and the Crystal Lake boat launch. Lakeview Terrace Park is accessible by automobile via two existing parking lots located off CR 81/Lakeland Ave N and 36th Ave N/Lakeland Ave N. Pedestrian and bicycle access is also provided through connections to local sidewalks and off-street trails. The park is under the jurisdiction of the City of Robbinsdale. Because the park is a publicly owned, publicly accessible park of local significance, Lakeview Terrace Park is considered by FTA to be a Section 4(f) protected property.

The Project would require a temporary easement of approximately 0.8 acre of park property (see Figure A8-19) to construct the center-running LRT along CR 81 and transportation and drainage/water resources facilities. Construction activities would occur over a period of approximately 12 months and include grading work to match adjacent roadway elevations and for drainage/water resources facilities.

The portion of park property to be temporarily occupied during construction includes land with green space, a walking path, a multi-use trail (CLRT), and a road to the boat launch. The park amenities including the athletic fields, playground, walking path, and picnic area would not be affected. The road to the boat launch would be accessible to the public throughout construction and a detour route would be provided to maintain trail connectivity (see Section 8.5.1.6 for a discussion of CLRT). The Project includes a southbound left-turn lane to improve access to the boat launch road. The portion of the park to be temporarily occupied during construction would be restored to existing conditions or better, and restoration plans would be developed and implemented in consultation with the City of Robbinsdale.

FTA has determined that the temporary occupancy exception conditions would be met at this park, and no Section 4(f) use would result from Project implementation. The duration to construct the improvements would be less than the time needed for Project construction, no change in ownership of the land would occur, the nature and magnitude of the changes would be minimal, no interference of protected activities would occur, and the land used would be fully returned to a condition at least as good as existing conditions.



Figure A8-18 Spanjers Park





Figure A8-19 Lakeview Terrace Park/Crystal Lake Boat Launch





8.5.1.13 Wirth/Victory Memorial Pkwy Regional Trail

Wirth/Victory Memorial Pkwy Regional Trail is approximately 165 acres and features recreational open space, low-volume vehicular traffic on parkways, parking areas, and multi-use trails including CLRT and Grand Rounds Trail. Centrally located in the Regional Parks System within the Cities of Minneapolis, eastern Robbinsdale, and Golden Valley, this 4.1-mile linear park is located between Golden Valley Rd and 45th Ave N, bounded on the east by Webber Pkwy. The park is a part of the Minneapolis Grand Rounds Scenic Byway loop, a 50-mile long, 4,662-acre system of parks and parkways that encircles most of the City of Minneapolis. The park is under the jurisdiction of MPRB. Theodore Wirth Pkwy and Victory Memorial Dr within the Wirth/Victory Memorial Pkwy Regional Trail are NRHP-eligible components of the Grand Rounds Historic District; however, the area impacted by the Project was determined a non-contributing element of the historic district and is discussed in Section 8.5.2.6.

The park portion of Wirth/Victory Memorial Pkwy Regional Trail north of Lowry Ave along Victory Memorial Dr (designated as Victory Memorial Dr) was developed using DNR Outdoor Recreation Grant Program funding assistance and is discussed in Section 8.10.2 and is maintained by MPRB. There are existing Hennepin County and City of Minneapolis right-of-way easements at CR 81/Oakdale Ave/Lowry Ave for the transportation use, which encompasses the bridges, roadways, and retaining walls that are currently in place (see Figure A8-20). The Hennepin County and City of Minneapolis transportation easements encompass approximately 6.5 acres of the park.

The Project's proposed LOD overlap approximately 8.0 acres of the park, and temporary closures of portions of the park, parkways, and trails would be required during construction (see Figure A8-21). Theodore Wirth Pkwy, Victory Memorial Dr, and Grand Rounds Trail would be lowered to avoid an at-grade crossing of the LRT tracks. Lowry Ave would be elevated to avoid an at-grade crossing of the LRT tracks and would connect on structure at a signalized intersection with CR 81 and Oakdale Ave. Portions of the Theodore Wirth Pkwy and Victory Memorial Dr, along with Grand Rounds Trail, would be realigned to accommodate the Project. The primary Project elements (LRT tracks, station, and associated infrastructure) would be constructed at grade between the elevated northbound and southbound lanes of CR 81 occupying approximately 6.4 acres of the 6.5-acre Hennepin County and City of Minneapolis transportation easements.

The realignment would require an additional 1.6 acres of temporary construction easement from park property outside the Hennepin County and City of Minneapolis transportation easements. This realignment would remove the southbound CR 81 exit ramp and the intersection of Lowry Ave/Oakdale Ave from Theodore Wirth Pkwy and separate the grades of Theodore Wirth Pkwy, Victory Memorial Dr, and Grand Rounds Trail from the LRT tracks. The intersection of CR 81, Oakdale Ave, and Lowry Ave will be realigned north and elevated over the LRT tracks. These design elements would reduce the impervious surface within the park boundary. The existing paved areas that are no longer in use within the park boundary would be replaced with green space that would be available for recreational activities. The trail network throughout this area of the park would be maintained and enhanced with connections to the neighborhoods and the at-grade Lowry Ave Station. The Lowry Ave Station would provide additional access to the park for new and existing users for recreation, including transit customers. Modifications to a retaining wall west of Xerxes Ave and within the City of Minneapolis transportation easement would be required to accommodate the realignment of Memorial Pkwy.

Construction sequencing and scheduling would be developed in consultation with MPRB. Trail access would be maintained during construction, and detours would be provided when temporary trail closures occur.

A portion of the realigned parkway to the east, outside of existing park boundaries, would be within the Hennepin County transportation easement. As mitigation for the changes within the park property, the property underlying the parkway would be acquired and transferred to MPRB ownership, resulting in approximately 3.8 acres of new park property near the station. The Council would work closely with Hennepin County to transfer this property to MPRB within the transportation easement.



Figure A8-20 Wirth/Victory Memorial Pkwy Regional Trail Boundaries and Transportation Easements

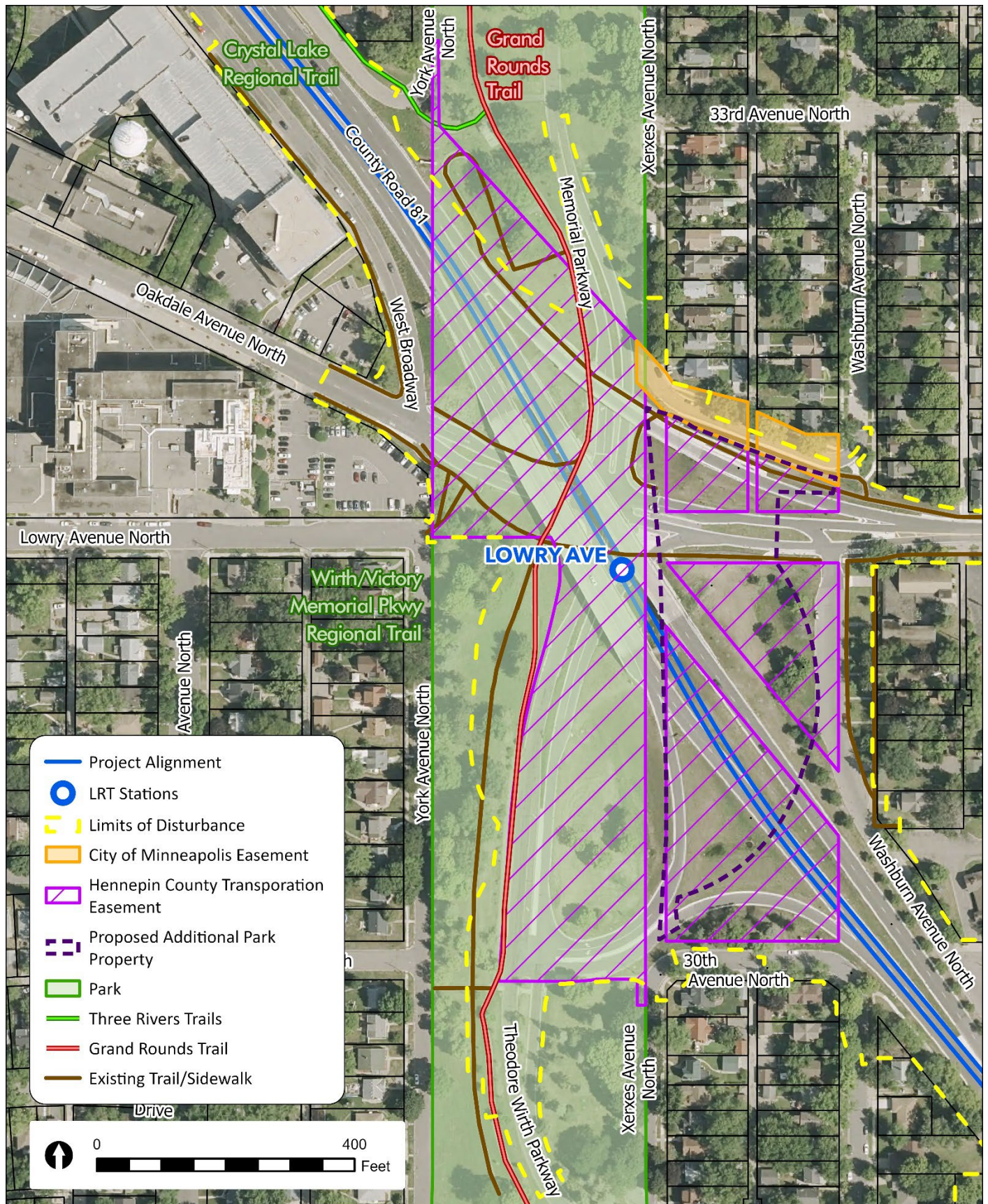




Figure A8-21 Wirth/Victory Memorial Pkwy Regional Trail





The portions of the Wirth/Victory Memorial Pkwy Regional Trail to be temporarily occupied during construction would be restored to existing conditions or better, and restoration plans would be developed and implemented in consultation with MPRB. There would be no change in ownership of the Wirth/Victory Memorial Pkwy Regional Trail. The realignment of the parkway and new trail connections, together with the LRT and LRT station, would maintain existing trail access while improving access to the park for those who may not have access by car but who would use LRT.

The duration of the construction activities for Wirth/Victory Memorial Pkwy Regional Trail is estimated to be approximately 36 months. The park would be generally accessible to the public throughout construction, although access to portions of the park, parkways, and trails would be temporarily closed. and park patrons would need to access Wirth/Victory Memorial Pkwy Regional Trail from York Ave N on the west side of the park and from Xerxes Ave N on the east side of the park. Staging and detour plans would be reviewed with MPRB. Uses related to temporary changes to access would be mitigated by development of a Construction Communication Plan, which would include advance notice of construction activities and required detours.

Based on this information, FTA has determined that use of Wirth/Victory Memorial Pkwy Regional Trail qualifies as a *de minimis* impact since the Project would not adversely affect the features, attributes, or activities qualifying the property for protection under Section 4(f).

8.5.1.14 North Commons Park

North Commons Park is located in the southwest quadrant of Golden Valley Rd and N James Ave in the City of Minneapolis. The 25.7-acre public park is located approximately 300 feet south of the Project Alignment (see Figure A8-22). Park amenities include baseball, football, soccer, and softball fields; basketball and tennis courts; a biking path; a skating rink (winter); a picnic area; a playground; a wading pool; a walking path; and a water park. The park is under the jurisdiction of MPRB. Because the park is a publicly owned, publicly accessible park of local significance, North Commons Park is considered by FTA to be a Section 4(f) protected property.

The Project would not result in permanent or temporary incorporation of land from North Commons Park and the proximity of the Project would not result in impacts so severe that the protected activities, features, or attributes that qualify the resource for protection under Section 4(f) are substantially impaired. Existing bicycle, pedestrian, and vehicular access to North Commons Park would be maintained under the Project. Although the sound of the LRT system could be audible from within the park, the park is not considered a sensitive noise receptor based on FTA criteria. The Project could result in changes in the park's setting and visitors' visual experience through the introduction of the Project Alignment one block north of the park. The visual changes and uses would not alter or impair the overall use or function of North Commons Park.

Based on this information, FTA has determined that there would be no Section 4(f) use of North Commons Park as a result of Project implementation.



Figure A8-22 North Commons Park





8.5.1.15 Cottage Park

Cottage Park is located in the southeast quadrant of N Ilion Ave and N James Ave in the City of Minneapolis. The 0.5-acre public park is located approximately 300 feet north of the Project Alignment (see Figure A8-23). Park amenities include a playground. The park is under the jurisdiction of MPRB. Because the park is a publicly owned, publicly accessible park of local significance, Cottage Park is considered by FTA to be a Section 4(f) protected property.

The Project would not result in permanent or temporary incorporation of land from Cottage Park, and the proximity of the Project would not result in impacts so severe that the protected activities, features, or attributes that qualify the resource for protection under Section 4(f) are substantially impaired. Existing bicycle, pedestrian, and vehicular access to the park would be maintained under the Project. Although the sound of the LRT system could be audible from within the park, the park is not considered a sensitive noise receptor based on FTA criteria. The Project could result in changes in the park's setting and visitors' visual experience through the introduction of the Project Alignment one block south of the park. The visual changes and uses would not alter or impair the overall use or function of Cottage Park.

Based on this information, FTA has determined that there would be no Section 4(f) use of Cottage Park as a result of Project implementation.

8.5.1.16 2105 Girard Ave N and Associated Parcels

2105 Girard Ave N and associated parcels are located west of Girard Ave N and south of N 22nd Ave in the City of Minneapolis, west of the MPS administration building. The 1.9-acre grassed area is bordered by an alley on the west and N 21st Ave on the south and has a fence around the land. Amenities include playground equipment and basketball hoops. Pedestrian access is provided through two openings in the fence along Girard Ave N. The property is under the jurisdiction of MPS, and while not designated formally as a park, is accessible to the public for recreation purposes.

The Project would require a temporary easement of approximately 0.08 acre at the south edge of 2105 Girard Ave N and associated parcels to construct the LRT along N 21st Ave (see Figure A8-24). This portion of the property, which would be temporarily occupied for a period of approximately 12 months, is green space adjacent to the roadway. Playground equipment and basketball hoops are located more than 150 feet from temporary easement area. All areas of the property that would be affected by construction activities would be restored to existing conditions or better, including replacing the existing fence affected by construction activities. Restoration plans would be developed and implemented in consultation with MPS. The property would continue to be accessible to the public during construction, and there would be no permanent changes to the property.

FTA has determined that the temporary occupancy exception conditions would be met at this property, and no Section 4(f) use would result from Project implementation. The duration to construct the improvements would be less than the time needed for Project construction, no change in ownership of the land would occur, the nature and magnitude of the changes would be minimal, no interference of protected activities would occur, and the land used would be fully returned to a condition at least as good as existing conditions.

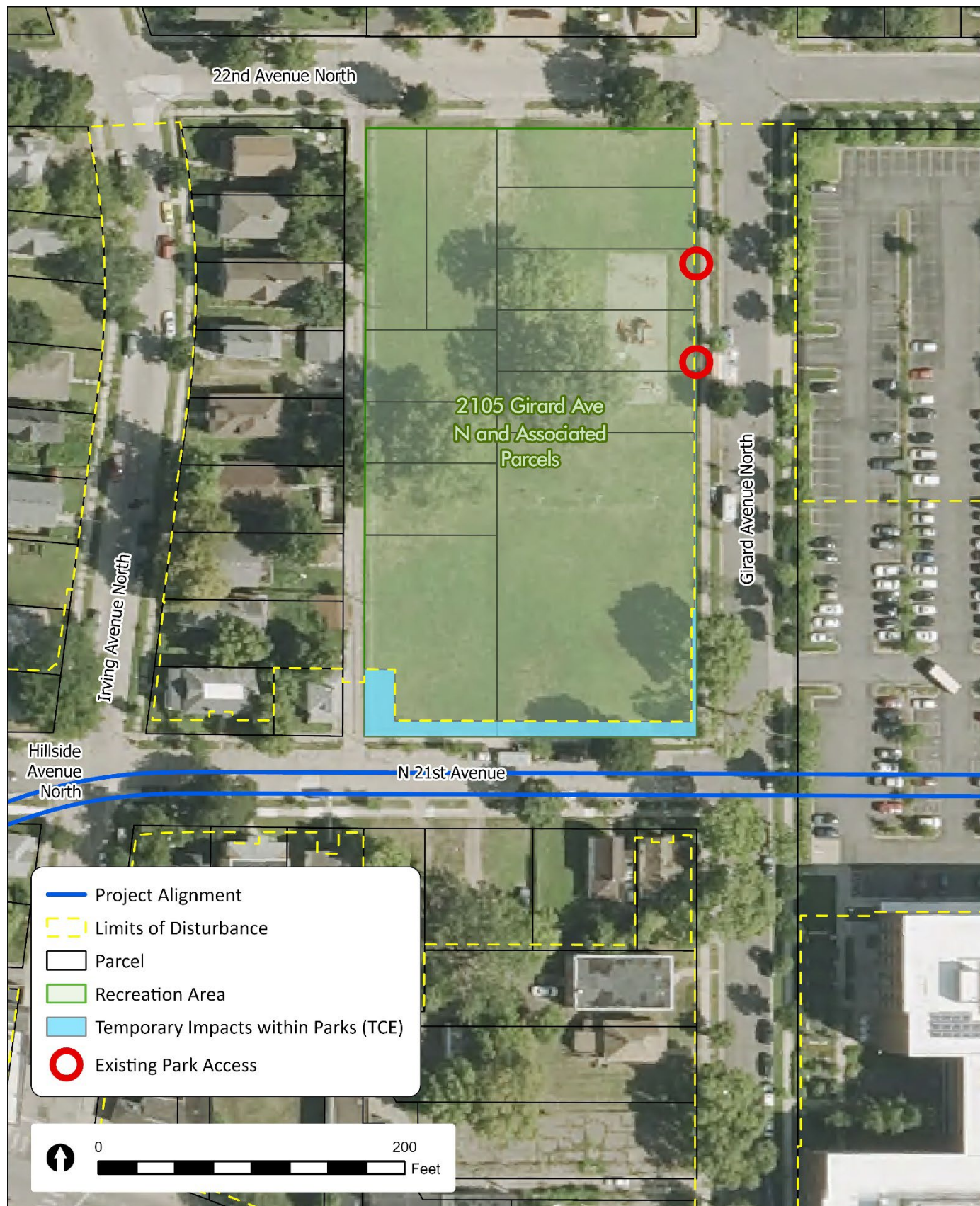


Figure A8-23 Cottage Park





Figure A8-24 2105 Girard Ave N and Associated Parcels





8.5.1.17 North Loop Park

North Loop Park is located along 3rd St N between 7th Ave and 8th Ave in the City of Minneapolis. The 0.6-acre public park is located approximately 900 feet south of the Project Alignment and 100 feet south of a new roadway (see Figure A8-25). In 2021, North Loop Park was funded by MPRB and is currently open green space. The park is under the jurisdiction of MPRB.

The Project would not result in permanent or temporary incorporation of land from North Loop, and the proximity of the Project would not result in impacts so severe that the protected activities, features, or attributes that qualify the resource for protection under Section 4(f) are substantially impaired. Existing bicycle, pedestrian, and vehicular access to the park would be maintained under the Project. Although the sound of LRVs could be audible from within the park, the park is not considered a sensitive noise receptor based on FTA criteria. The Project could result in changes in the park's setting and visitors' visual experience through the introduction of the Project Alignment two blocks north of the park. The visual changes and uses would not alter or impair the overall use or function of North Loop Park.

Based on this information, FTA has determined that there would be no Section 4(f) use of North Loop Park as a result of Project implementation.

8.5.2 Historic Properties

This section describes the historic properties in the study area and provides the rationale for the FTA's preliminary Section 4(f) use determinations.

8.5.2.1 Minneapolis & Pacific Railway Historic District (Soo Line)

The Minneapolis & Pacific Railway Historic District (Soo Line) is located in the City of Crystal. This historic district is eligible for listing in the NRHP under Criterion A. Based on the current level of design, the Project would not result in permanent or temporary incorporation of land from the Minneapolis & Pacific Railway Historic District (Soo Line). The roadway bridges spanning over the historic district would be reconstructed to incorporate the Project LRT facilities.

A Section 106 finding of No Adverse Effect has been made with respect to the Project impacts at the Minneapolis & Pacific Railway Historic District (Soo Line). Based on the Section 106 finding of No Adverse Effect, FTA has determined that no Section 4(f) use pursuant to this Section 4(f) property would result from Project implementation.

8.5.2.2 Graeser Park (Historic Property)

Graeser Park is located in the City of Robbinsdale and is eligible for listing in the NRHP under Criterion C. The historic property is 7.1 acres. Based on the current level of design, the Project would require a temporary easement of approximately 2.58 acres of the Graeser Park historic property (see Figure A8-26). This would be necessary to allow for grading associated with the southbound CR 81 to southbound TH 100 ramp improvements, sidewalk improvements, and construction of two BMPs. This temporary easement would be located in an area of the property where the features likely to be used do not define the historic character of the property.

A Section 106 finding of No Adverse Effect has been made with respect to the Project impacts at Graeser Park (historic property). Based on the Section 106 finding of No Adverse Effect, FTA has determined that a temporary occupancy exception would apply, and no Section 4(f) use would result from Project implementation.



Figure A8-25 North Loop Park

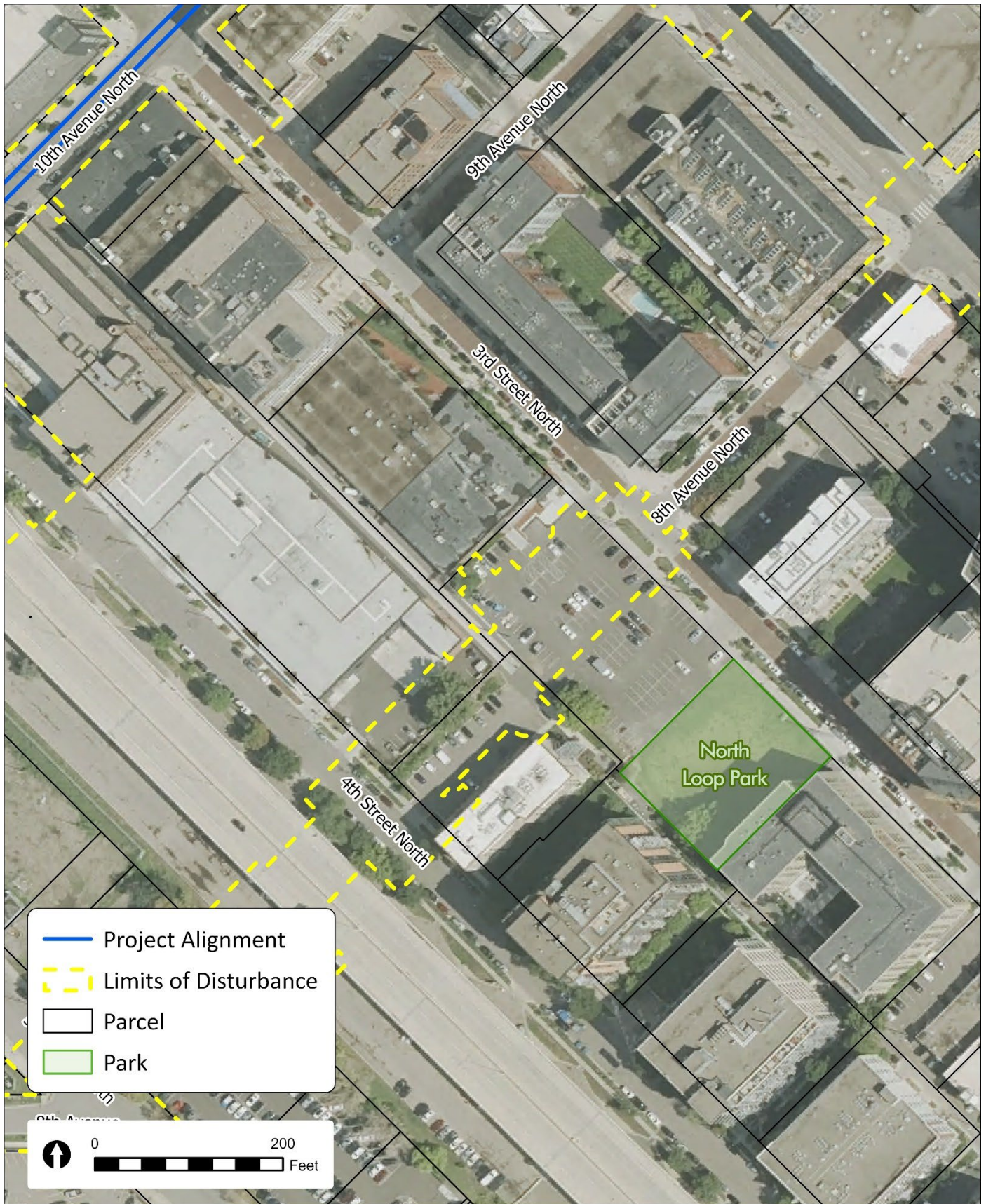
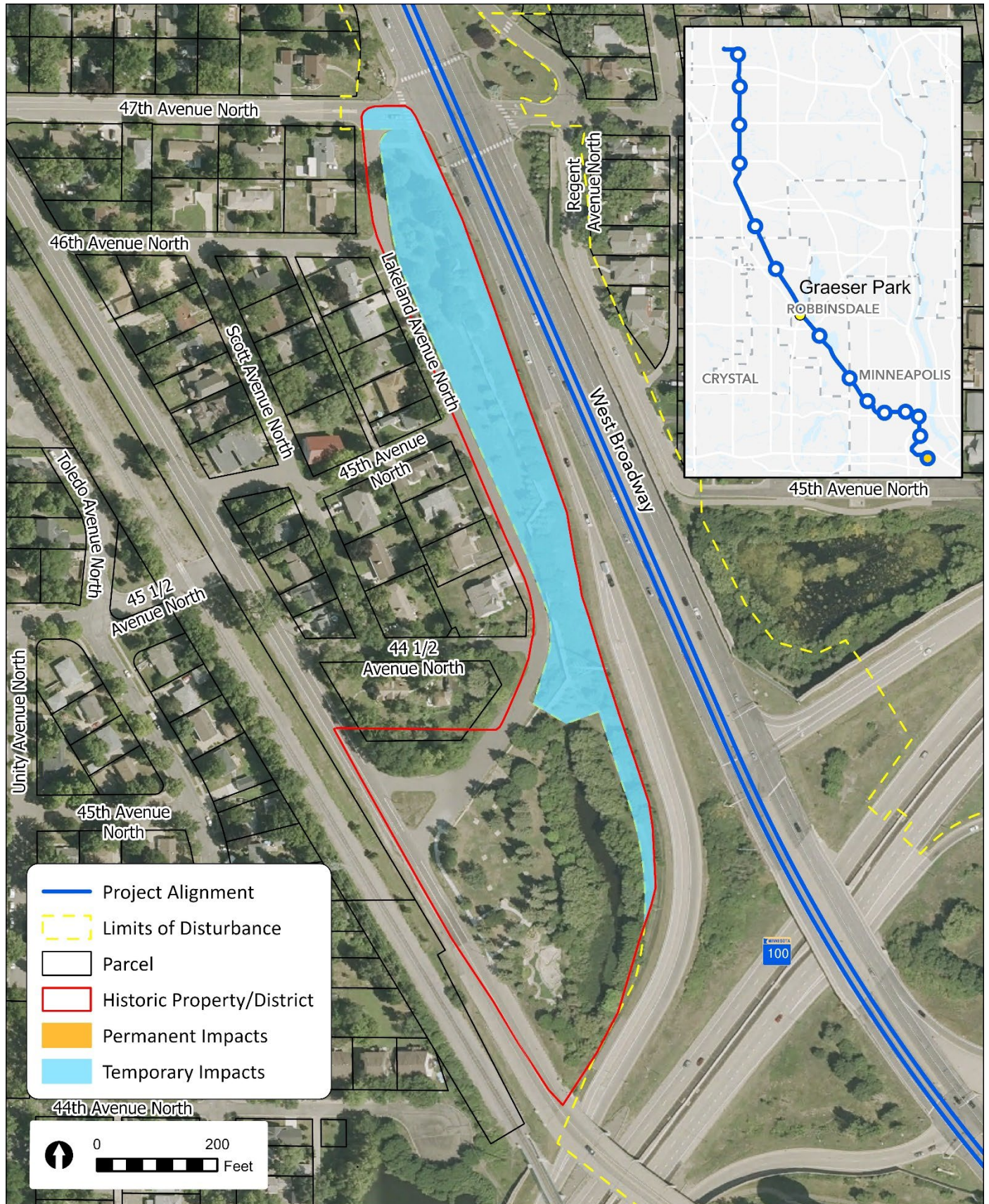




Figure A8-26 Graeser Park (Historic Property)





8.5.2.3 West Broadway Ave Residential Historic District

The West Broadway Ave Residential Historic District is located in the City of Robbinsdale along W Broadway Ave between 42nd Ave N and TH 100, from Lakeland Ave N to the BNSF right-of-way. The West Broadway Ave Residential Historic District is eligible for listing in the NRHP under Criterion A. The historic district is 10.3 acres. Based on the Project's current level of design, the Project would result in a permanent incorporation of approximately 0.10 acre of land from the historic district (1.0 percent of district) and 0.01 acre of temporary easement. This would be necessary to allow for roadway realignment and sidewalk improvements (see Figure A8-27).

A Section 106 finding of No Adverse Effect has been made with respect to the Project impacts at the West Broadway Ave Residential Historic District. Based on the Section 106 finding of No Adverse Effect, FTA has determination that a *de minimis* use pursuant to this Section 4(f) property would result from Project implementation due to the permanent incorporation of land

8.5.2.4 Hennepin County Library, Robbinsdale Branch

The Hennepin County Library, Robbinsdale Branch is located in the City of Robbinsdale at 4915 42nd Ave N and is currently operated as Robbin Gallery (an art gallery). This historic property is listed in the NRHP under Criterion A. The historic property is 0.3 acre. The Project would require a temporary easement of approximately 0.01 acre from the Hennepin County Library, Robbinsdale Branch (see Figure A8-28). This temporary occupancy would be required to allow for in-kind reconstruction of the property (sidewalks, curb, lot regrading) adjoining 42nd Ave N associated with the roadway improvements including a quiet zone-ready intersection. Construction activities would include roadway reconstruction.

Construction activities would not interfere with the public accessing the building. Council staff would coordinate with gallery staff to identify timing of certain activities that should be considered when setting the schedule for construction. Uses related to temporary changes to access would be mitigated by development of a Construction Communication Plan, which would include advance notice of construction activities and highlighting sidewalk closures and detour routes. Restoration plans would be developed and implemented in consultation with SHPO. There would be no permanent change to the historic building as a result of Project actions.

A Section 106 finding of No Adverse Effect has been made with respect to the Project impacts at the Hennepin County Library, Robbinsdale Branch. Based on the Section 106 finding of No Adverse Effect, FTA has determined that a temporary occupancy exception would apply, and no Section 4(f) use would result from Project implementation.

8.5.2.5 Guaranty State Bank of Robbinsdale

The Guaranty State Bank of Robbinsdale is located in the City of Robbinsdale at 3700 W Broadway Ave. This historic property is eligible for listing in the NRHP under Criterion C. The historic property is 0.6 acre. Based on the current level of design, the Project would not result in permanent or temporary incorporation of land from the Guaranty State Bank of Robbinsdale (see Figure A8-29).

A Section 106 finding of No Adverse Effect has been made with respect to the Project impacts at the Guaranty State Bank of Robbinsdale. Based on the Section 106 finding of No Adverse Effect, FTA has determined that no Section 4(f) use pursuant to this Section 4(f) property will result from Project implementation.



Figure A8-27 West Broadway Ave Residential Historic District





Figure A8-28 Hennepin County Library, Robbinsdale Branch

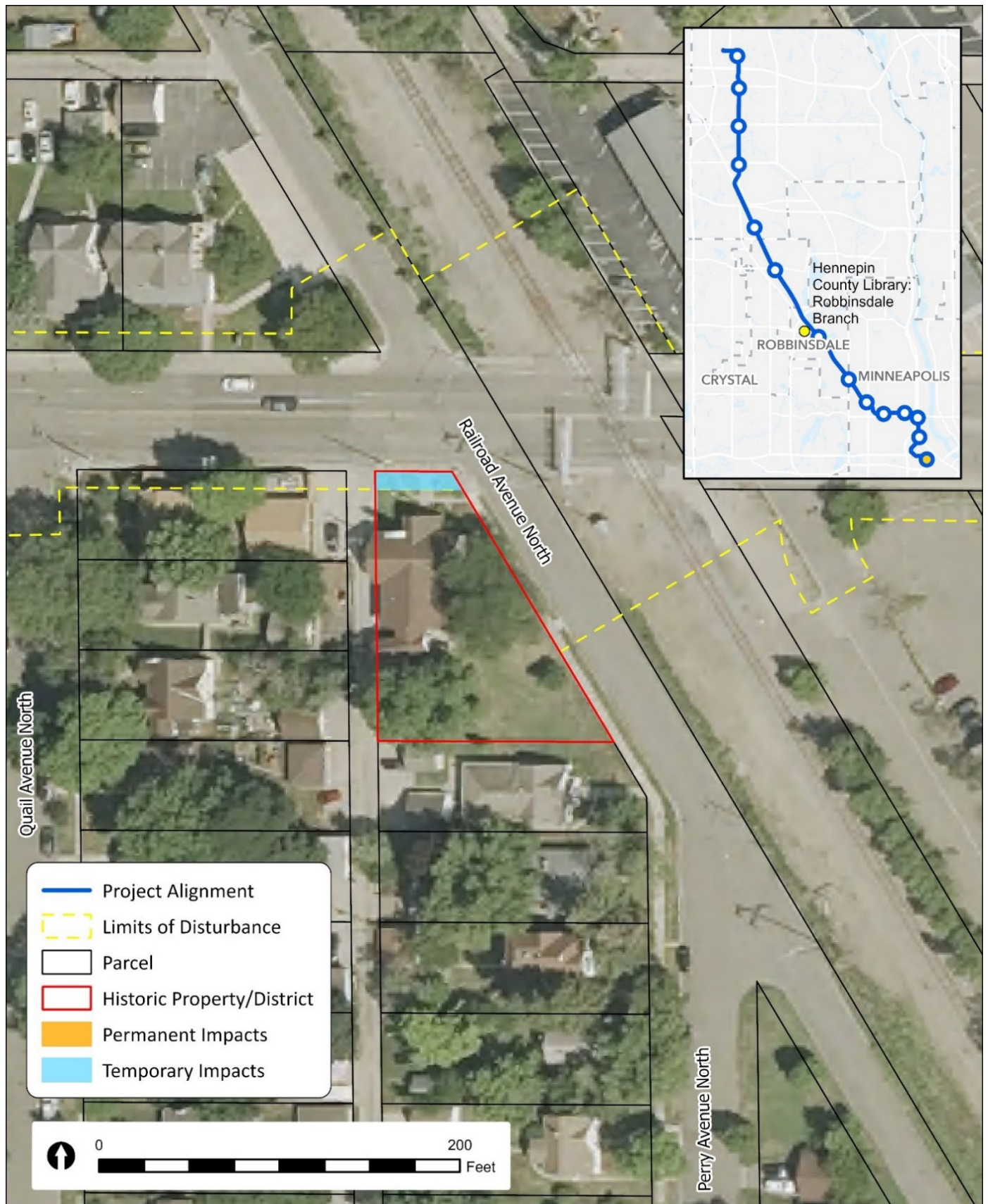
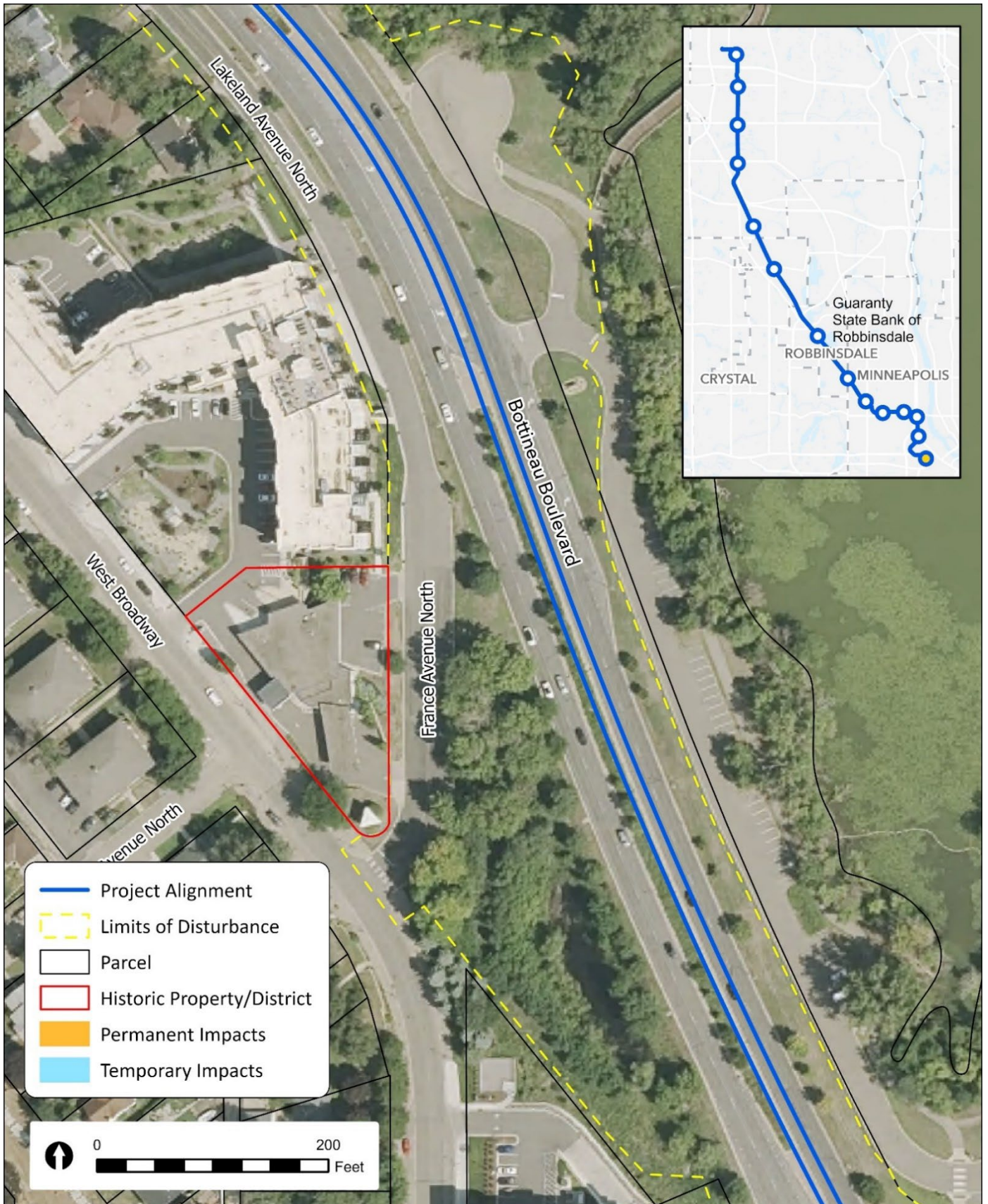




Figure A8-29 Guaranty State Bank of Robbinsdale





8.5.2.6 Grand Rounds Historic District (Theodore Wirth Pkwy Segment and Victory Memorial Dr Segment)

The Grand Rounds Historic District (Theodore Wirth Pkwy Segment and Victory Memorial Dr Segment) is located in the Cities of Robbinsdale and Minneapolis. The Grand Rounds Historic District is eligible for listing in the NRHP under Criteria A and C.

The Grand Rounds Historic District (Theodore Wirth Pkwy Segment and Victory Memorial Dr Segment) includes Hennepin County and City of Minneapolis right-of-way easements at CR 81/Oakdale Ave/Lowry Ave for the transportation use, which encompasses the bridges, roadways, and retaining walls that are currently in place (see Figure A8-20). A non-contributing segment of the Grand Rounds Historic District crosses the Project (see Figure A8-30). This portion of the historic district is 165 acres.

Based on the current level of design, the Project would not result in a permanent incorporation of land from the Grand Rounds Historic District (Theodore Wirth Pkwy Segment and Victory Memorial Dr Segment). The LRT elements of the Project would be constructed within 6.4 acres of the Hennepin County and City of Minneapolis transportation easements over a portion of the Grand Rounds Historic District (Theodore Wirth Pkwy Segment and Victory Memorial Dr Segment).

An additional 1.6 acres of temporary easement would be required outside the Hennepin County and City of Minneapolis transportation easements within the historic district. Because the Project would be in a non-contributing segment of the Grand Rounds Historic District (Theodore Wirth Pkwy Segment and Victory Memorial Dr Segment), it is not considered to be a temporary occupancy of property.

A Section 106 finding of No Adverse Effect has been made with respect to the Project impacts at the Grand Rounds Historic District. Based on the Section 106 finding of No Adverse Effect, FTA has determined that no Section 4(f) use pursuant to this Section 4(f) property would result from Project implementation.

8.5.2.7 Pilgrim Heights Community Church

The Pilgrim Heights Community Church is located in the City of Minneapolis at 3120 Washburn Ave N. This historic property is eligible for listing in the NRHP under Criterion C. The historic property is 1.3 acres. Based on the current level of design, the Project would not result in permanent or temporary incorporation of land from the Pilgrim Heights Community Church (see Figure A8-31). The Lowry Ave Station would be constructed between 250 and 400 feet west of Pilgrim Heights Community Church.

A Section 106 finding of No Adverse Effect has been made with respect to the Project impacts at the Pilgrim Heights Community Church. Based on the Section 106 finding of No Adverse Effect, FTA has determined that no Section 4(f) use pursuant to this Section 4(f) property would result from Project implementation.

8.5.2.8 All Pets Animal Clinic

The All Pets Animal Clinic is located 2727 W Broadway Ave in the City of Minneapolis. The All Pets Animal Clinic is eligible for listing in the NRHP under Criterion C. The historic property is 0.2 acre. The Project would require a temporary easement of approximately 0.11 acre from the All Pets Animal Clinic (see Figure A8-32). This temporary occupancy would be required to allow for Project elements (LRT tracks, station, and associated infrastructure), roadway reconstruction, and sidewalk improvements.

A Section 106 finding of No Adverse Effect has been made with respect to the Project impacts at the All Pets Animal Clinic. Based on the Section 106 finding of No Adverse Effect, FTA has determined that a temporary occupancy exception would apply, and no Section 4(f) use would result from Project implementation.



Figure A8-30 Grand Rounds Historic District (Theodore Wirth Pkwy Segment and Victory Memorial Dr Segment)

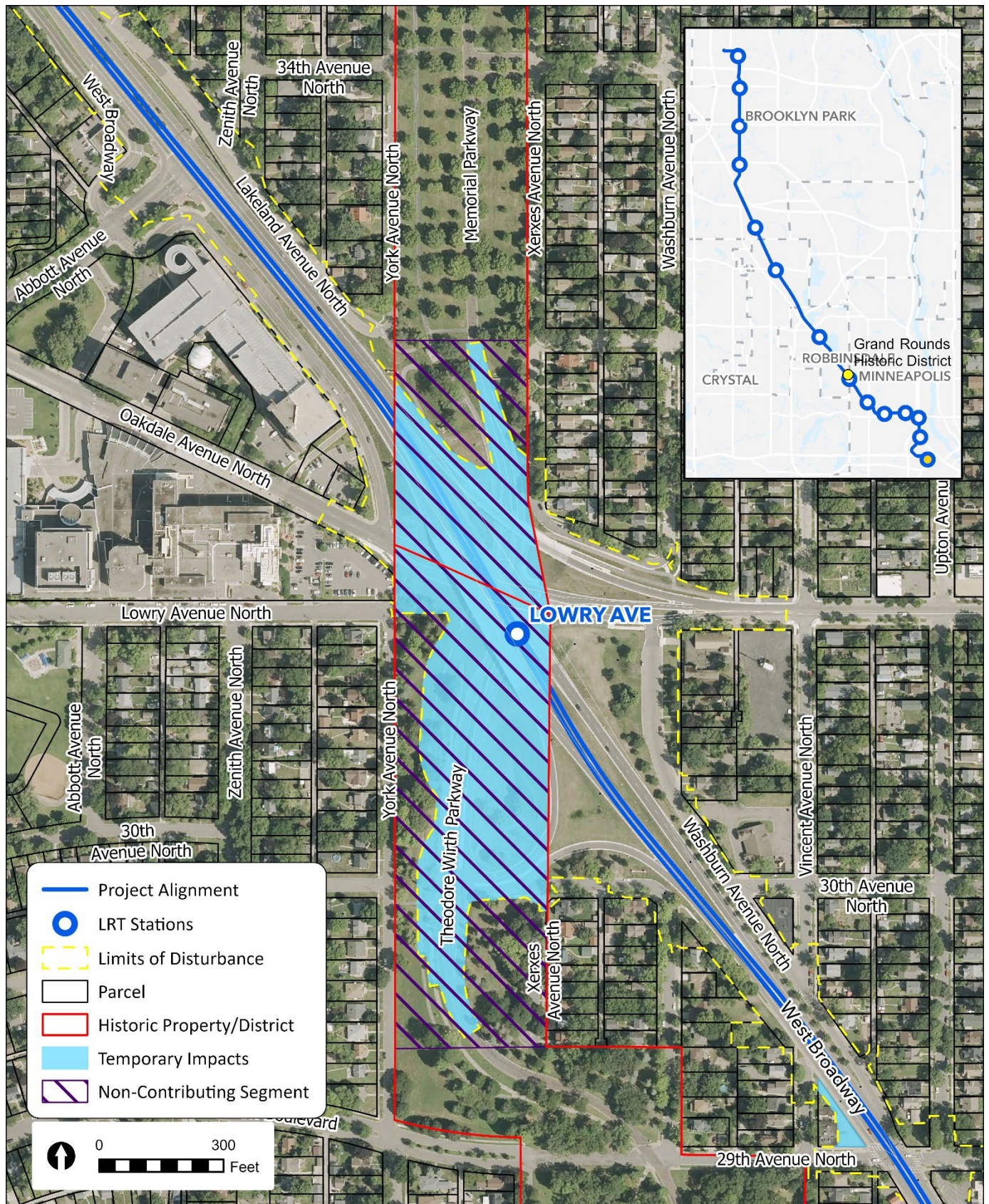




Figure A8-31 Pilgrim Heights Community Church

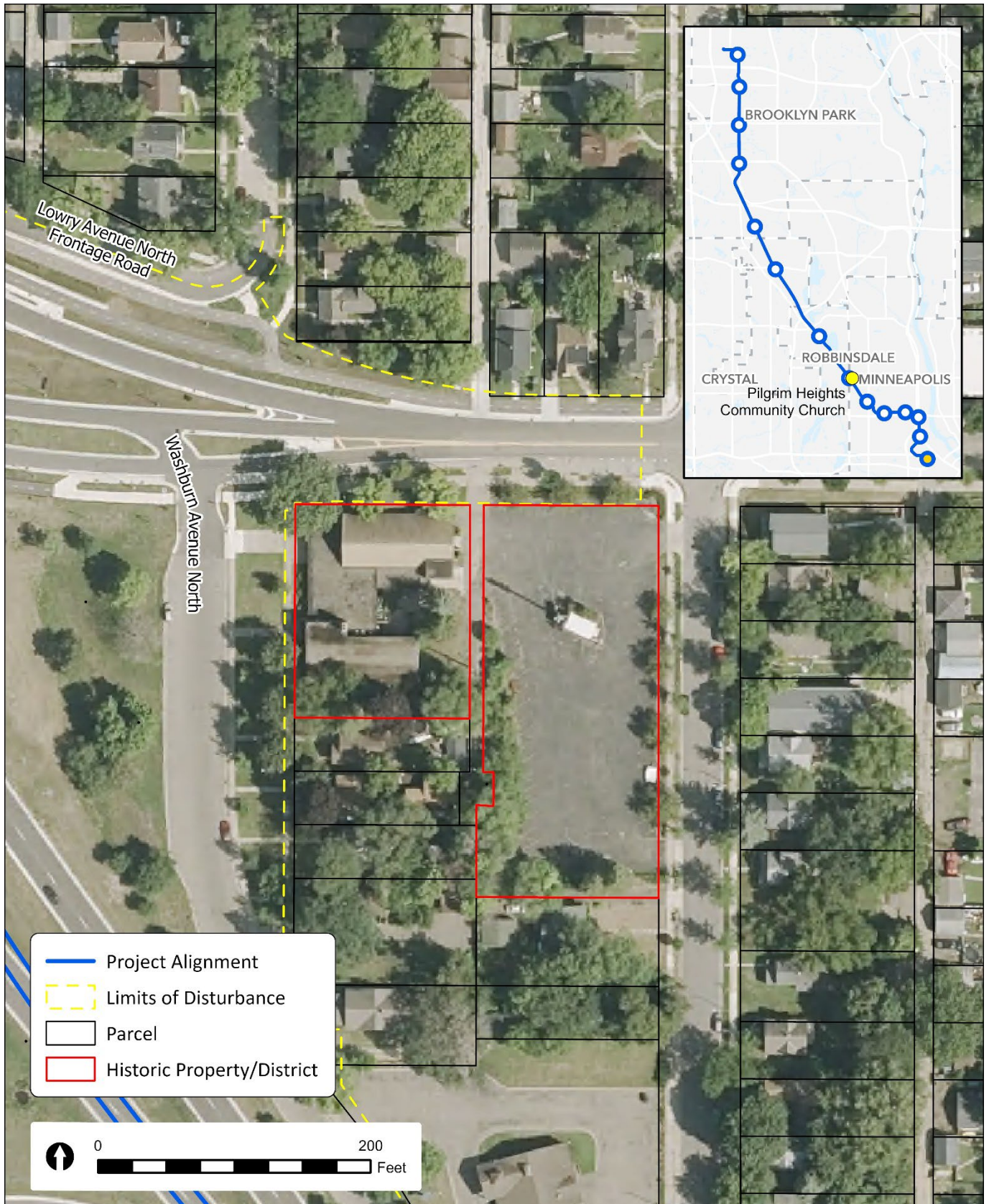
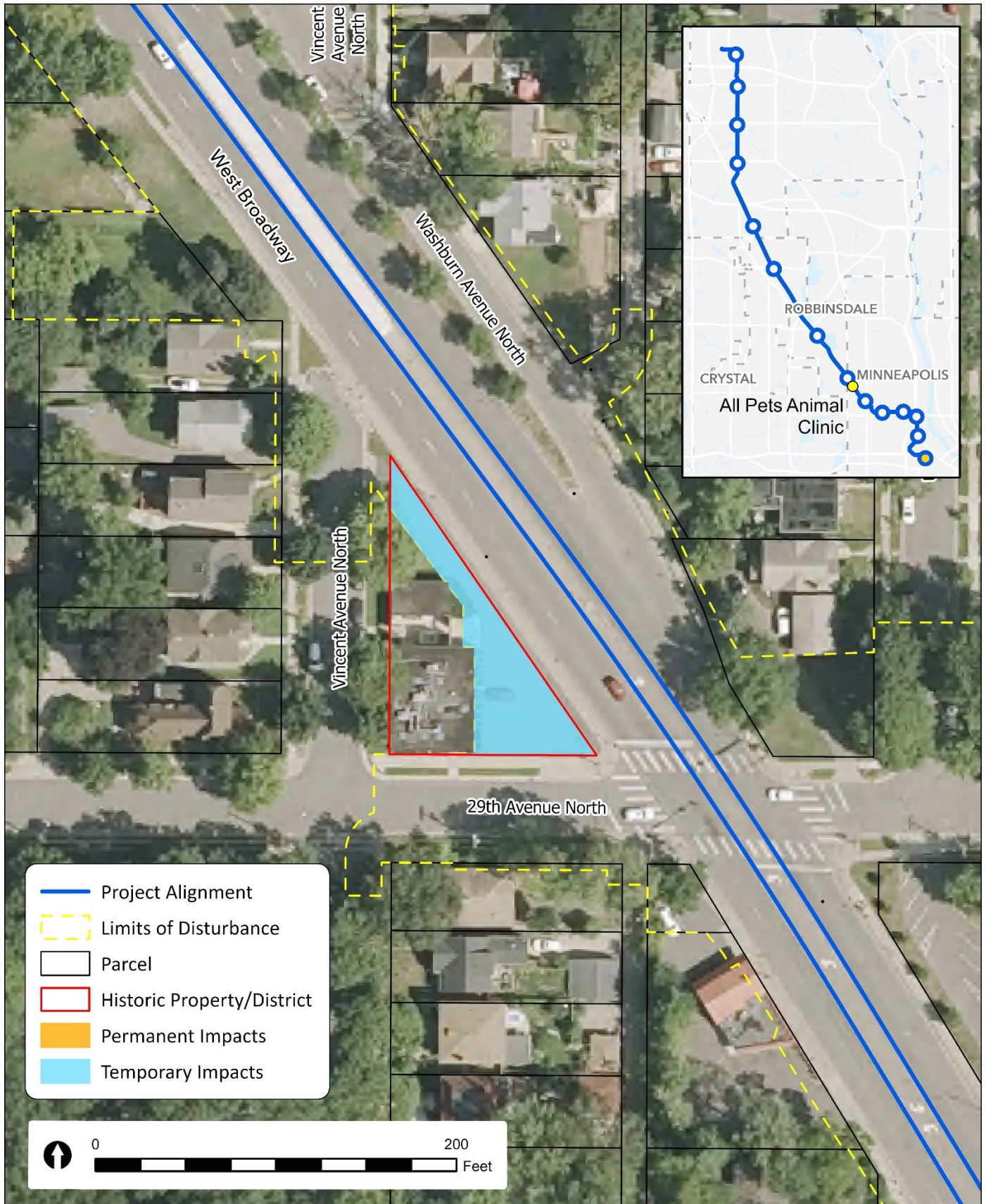




Figure A8-32 All Pets Animal Clinic





8.5.2.9 Forest Heights Addition Historic District

The Forest Heights Addition Historic District is located in the City of Minneapolis and is bounded by 26th Ave N, Penn Ave N, Golden Valley Rd, and Irving Ave N. The Forest Heights Addition Historic District is eligible for listing in the NRHP under Criteria A, B, and C. The historic district is 151.9 acres.

Based on the Project's current level of design, the Project would result in a permanent incorporation of nine properties within the historic district (approximately 2.29 acres, or 1.5 percent of the historic district), four of which are contributing to the significance of the historic district, and 2.11 acres of temporary easement (see Figure A8-33). This would be necessary to allow for Project elements (LRT tracks, station, and associated infrastructure), roadway reconstruction, and sidewalk improvements.

A Section 106 finding of Adverse Effect has been made with respect to the Project impacts at the Forest Heights Addition Historic District. Construction of the Project would occur for 0.64 mile along W Broadway Ave between Penn Ave N and approximately one-half block east of Irving Ave N in the City of Minneapolis within the Forest Heights Addition Historic District. Permanent incorporation of approximately 2.29 acres results from the need to construct the James Ave Station, LRT tracks, and other infrastructure between W Broadway Ave and N 21st Ave. Permanent incorporation includes acquisition and removal of four contributing historic properties totaling 0.47 acre. An additional 2.11 acres of the Forest Heights Addition Historic District would be directly impacted with temporary easements for construction access and staging.

Due to the physical destruction of part of the historic district (nine properties, four of which are contributing) and visual effects, the Project would significantly affect the Forest Heights Addition Historic District's integrity of setting, design, materials, and workmanship. Therefore, the Project would limit the historic district's ability to convey its historic significance under Criteria A, B, and C and would result in an adverse effect on the Forest Heights Addition Historic District.

Based on the Section 106 finding of Adverse Effect, FTA has made a preliminary determination that a Section 4(f) direct use (greater than a *de minimis* use) pursuant to this Section 4(f) property would result from Project implementation. The Council evaluated alternatives that avoid the use of this property to determine whether any would be feasible and prudent. The alternatives analysis is presented in Section 8.7. Measures to minimize harm to this property are described in Section 8.8.

8.5.2.10 North Community YMCA

The North Community YMCA is located in the City of Minneapolis at 1711 W Broadway Ave. The North Community YMCA is eligible for listing in the NRHP under Criterion A. The historic property is 1.5 acres. The Project would require permanent incorporation of approximately 0.05 acre of land from the North Community YMCA (3.4 percent of the property) and 0.17 acre of temporary easement (see Figure A8-34). This would be necessary to allow for Project elements (LRT tracks, station, and associated infrastructure), roadway reconstruction, and sidewalk improvements.

A Section 106 finding of No Adverse Effect has been made with respect to the Project impacts at the North Community YMCA. Based on the Section 106 finding of No Adverse Effect, FTA has determined that a *de minimis* use pursuant to this Section 4(f) property would result from Project implementation due to the permanent incorporation of land.

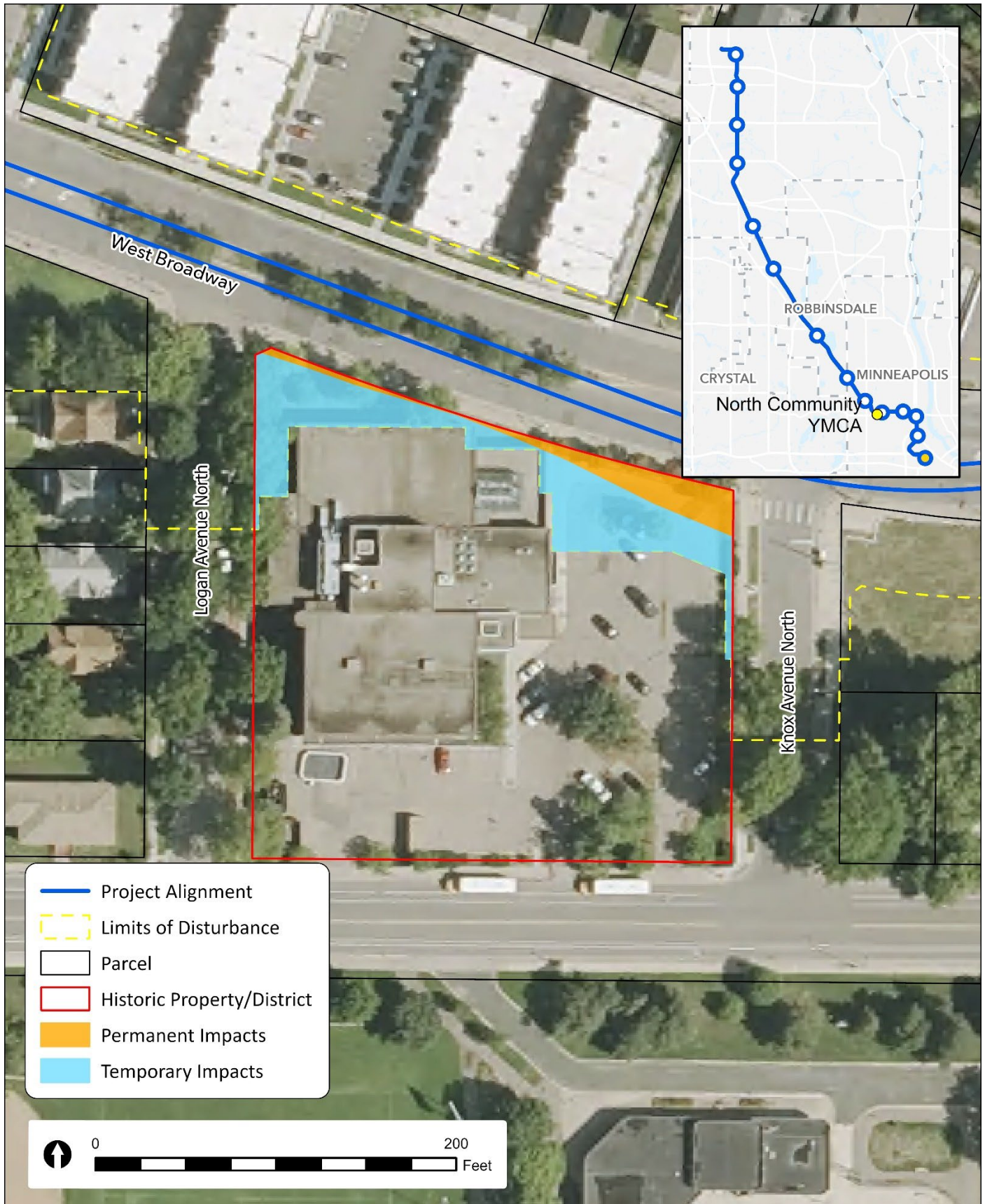


Figure A8-33 Forest Heights Addition Historic District





Figure A8-34 North Community YMCA





8.5.2.11 Durnam Hall

Durnam Hall is located in the City of Minneapolis at 927–931 W Broadway Ave. This historic property is eligible for listing in the NRHP under Criterion A. The historic property is 0.1 acre. The Project would place the LRT facilities approximately 400 feet from Durnam Hall on N 21st Ave and result in the temporary occupancy of less than 0.001 acre of property from Durnam Hall during construction (see Figure A8-35). This would be necessary to allow for roadway reconstruction and sidewalk improvements.

A Section 106 finding of No Adverse Effect has been made with respect to the Project impacts at Durnam Hall. Based on the Section 106 finding of No Adverse Effect, FTA has determined that a temporary occupancy exception would apply, and no Section 4(f) use would result from Project implementation.

8.5.2.12 Reno Land and Improvement Company Addition Historic District

The Reno Land and Improvement Company Addition Historic District is located in the City of Minneapolis along Lyndale Ave N between N 21st and N 22nd Ave. The Reno Land and Improvement Company Addition Historic District is eligible for listing in the NRHP under Criterion C. The historic district is 1.4 acres.

Based on the current level of design, the Project would result in a permanent incorporation of approximately 0.02 acre of land from Reno Land and Improvement Company Addition Historic District and 0.15 acre of temporary easement (see Figure A8-36). This would be necessary to allow for Project elements (LRT tracks, station, and associated infrastructure), roadway reconstruction, and sidewalk improvements. Impacts to the existing structure at 2102 Lyndale Ave N would be avoided, but the current level of design is not refined enough to show this in detail and includes the property in the LOD for grading.

A Section 106 finding of No Adverse Effect has been made with respect to the Project impacts at the Reno Land and Improvement Company Addition Historic District. Based on the Section 106 finding of No Adverse Effect, FTA has determined that a *de minimis* use pursuant to this Section 4(f) property would result from Project implementation due to the permanent incorporation of land.

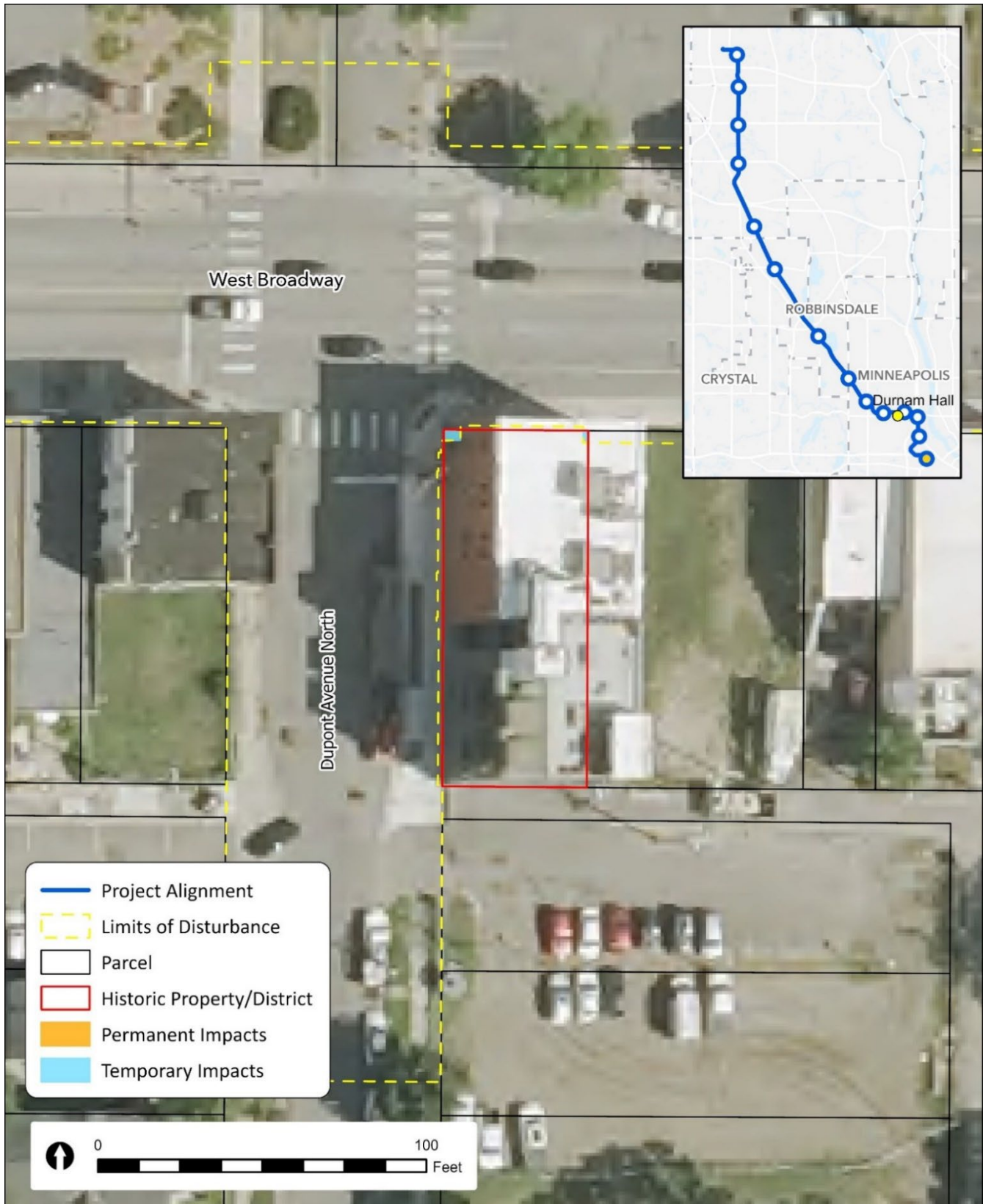
8.5.2.13 Sundseth Undertaking/Sundseth-Anderson Funeral Home

The Sundseth Undertaking/Sundseth-Anderson Funeral Home is located in the City of Minneapolis at 2024 Lyndale Ave N. The Sundseth Undertaking/Sundseth-Anderson Funeral Home is eligible for listing in the NRHP under Criterion C. The historic property is 0.7 acre. Based on the current level of design, the Project would result in a permanent incorporation of less than 0.001 acre of land from Sundseth Undertaking/Sundseth-Anderson Funeral Home and the temporary occupancy of 0.04 acre of property from Sundseth Undertaking/Sundseth-Anderson Funeral Home during construction (see Figure A8-37). This would be necessary to allow for Project elements (LRT tracks, station, and associated infrastructure), roadway reconstruction, and sidewalk improvements.

A Section 106 finding of No Adverse Effect has been made with respect to the Project impacts at the Sundseth Undertaking/Sundseth-Anderson Funeral Home. Based on the Section 106 finding of No Adverse Effect, FTA has determined that a *de minimis* use pursuant to this Section 4(f) property would result from Project implementation due to the permanent incorporation of land.



Figure A8-35 Durnam Hall



Note: The aerial and building footprint were captured with different orthophotograph methodologies. The result is a visual building lean and/or distortion in the aerial, while the historic property outline shows the true footprint.



Figure A8-36 Reno Land and Improvement Company Addition Historic District

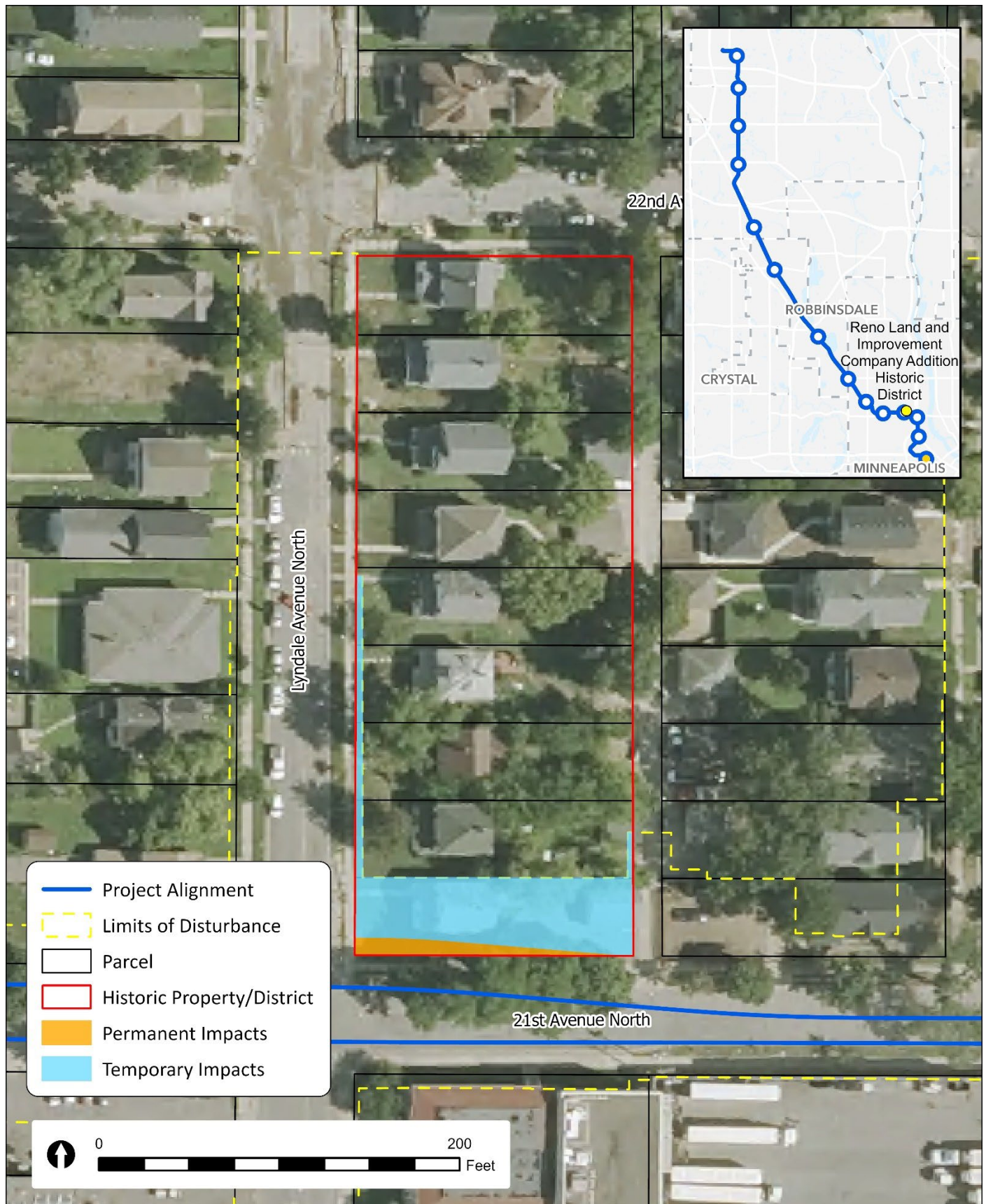
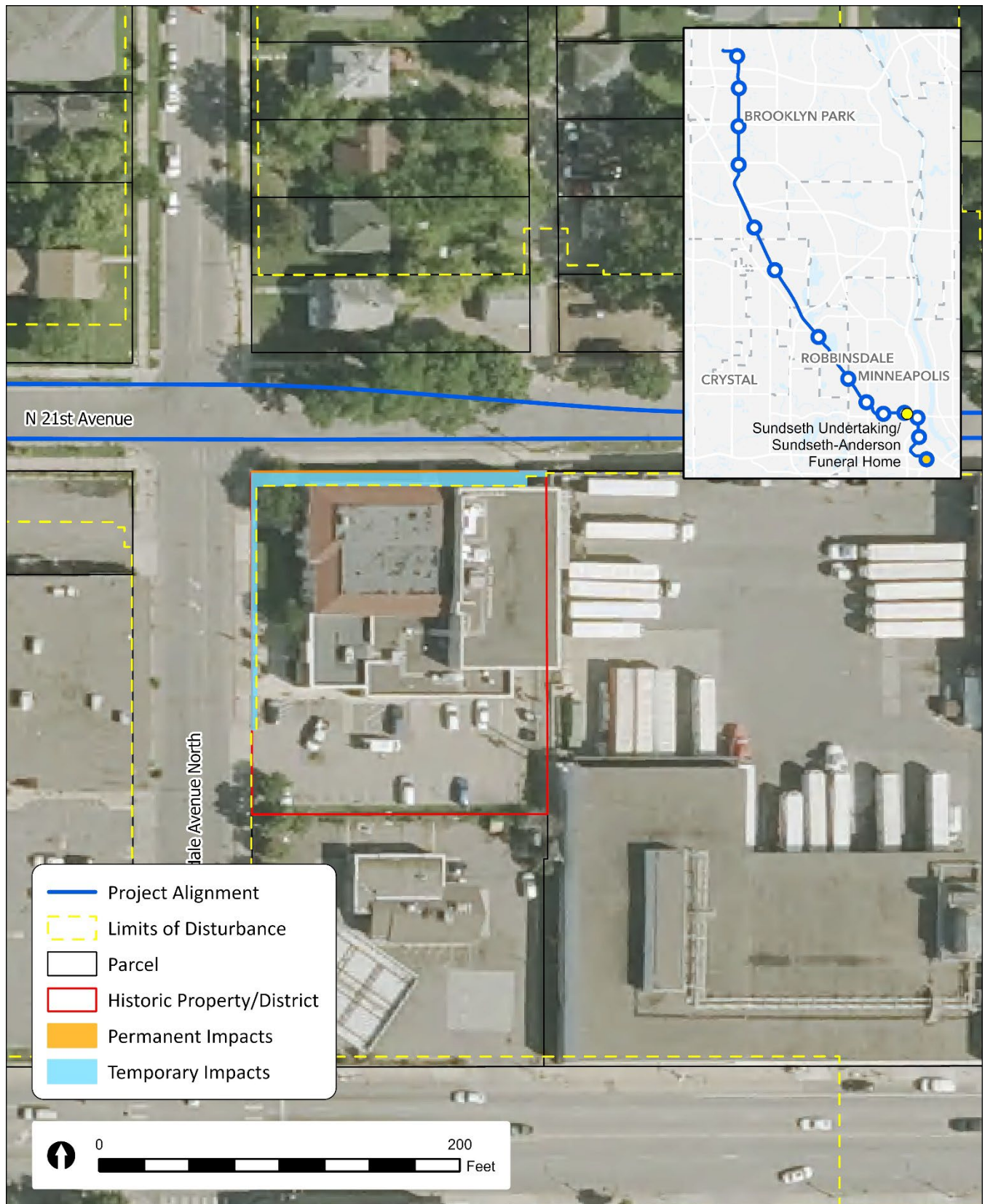




Figure A8-37 Sundseth Undertaking/Sundseth-Anderson Funeral Home



Note: The aerial and building footprint were captured with different orthophotograph methodologies. The result is a visual building lean and/or distortion in the aerial, while the historic property outline shows the true footprint.



8.5.2.14 Franklin Co-Operative Creamery Association North Side Complex

The Franklin Co-Operative Creamery Association North Side Complex includes two discontinuous parcels, the Franklin Co-Operative Creamery Association North Side Plant at 2108 Washington Ave N and a garage and barn at 2017 2nd St N in the City of Minneapolis. This historic property is eligible for listing in the NRHP under Criterion A. The historic property is 1.9 acres. Based on the current level of design, the Project would result in the temporary occupancy of 0.01 acre of property from the Franklin Co-Operative Creamery Association North Side Complex during construction (see Figure A8-38). This would be necessary to allow for Project elements (LRT tracks and associated infrastructure), roadway reconstruction, and sidewalk improvements.

A Section 106 finding of No Adverse Effect has been made with respect to the Project impacts at the Franklin Co-Operative Creamery Association North Side Complex. Based on the Section 106 finding of No Adverse Effect, FTA has determined that a temporary occupancy exception would apply and that no Section 4(f) use would result from Project implementation.

8.5.2.15 Control-Data Institute and Control Data – Northside Manufacturing Plant

The Control-Data Institute and Control Data – Northside Manufacturing Plant is located in the City of Minneapolis at 1001 Washington Ave N and 227 12th Ave N. The Control-Data Institute and Control Data – Northside Manufacturing Plant is eligible for listing in the NRHP under Criterion A. The historic property is 5.5 acres. Based on the Project's current level of design, the Project would result in a permanent incorporation of approximately 0.42 acre of land from the Control-Data Institute and Control Data – Northside Manufacturing Plant (7.6 percent of the property) and 1.32 acres of temporary easement (see Figure A8-39). This would be necessary to allow for Project elements (LRT tracks, station, and associated infrastructure), roadway reconstruction, and sidewalk improvements.

A Section 106 finding of No Adverse Effect has been made with respect to the Project impacts at the Control-Data Institute and Control Data – Northside Manufacturing Plant. Based on the Section 106 finding of No Adverse Effect, FTA has determined that a *de minimis* use pursuant to this Section 4(f) property would result from Project implementation due to the permanent incorporation of land.

8.5.2.16 Northwestern National Bank – North American Office

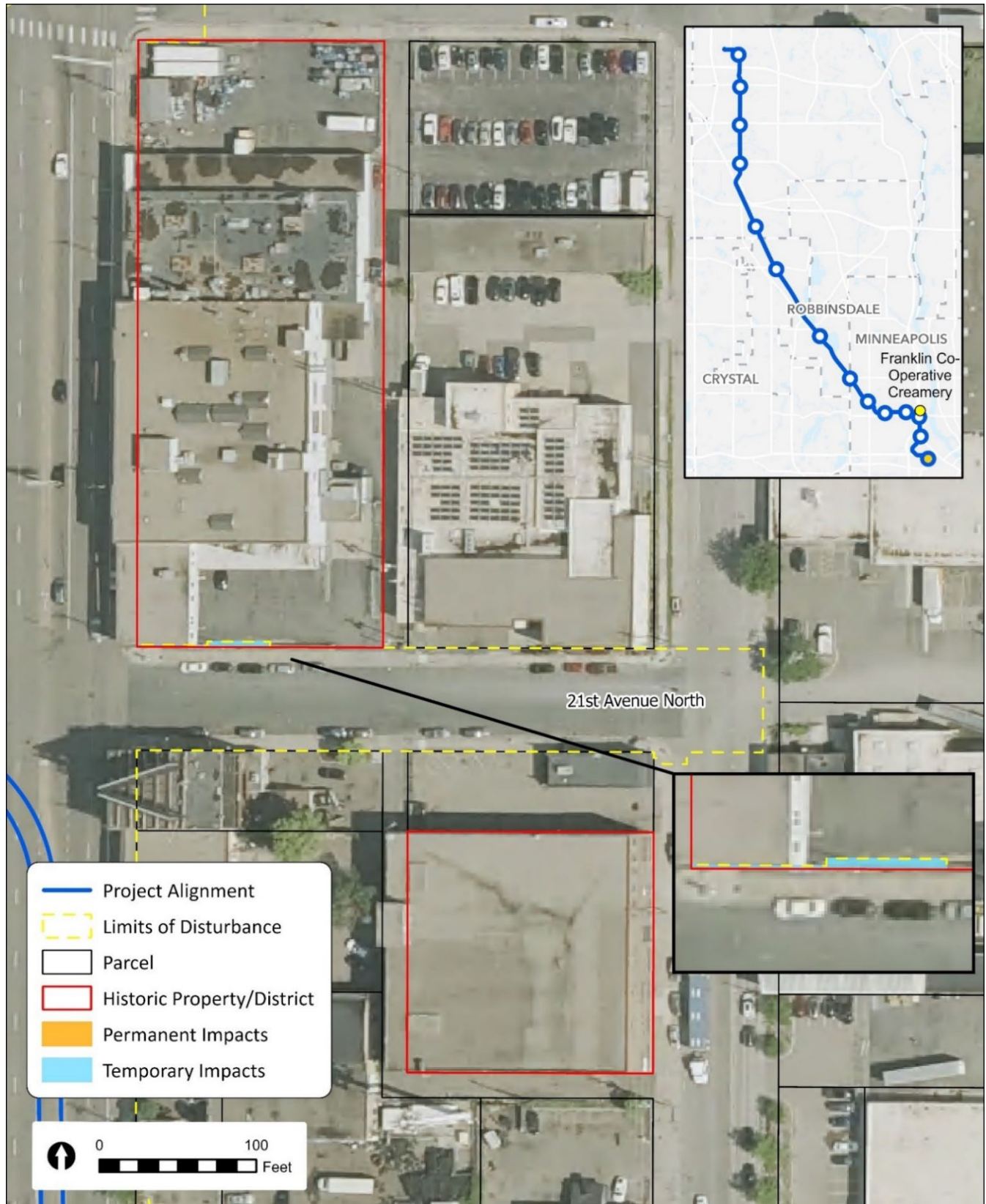
The Northwestern National Bank – North American Office is located in the City of Minneapolis at 615 7th St N and is currently operated as a Wells Fargo Bank. The Northwestern National Bank – North American Office is eligible for listing in the NRHP under Criterion A. The historic property is 1.0 acre. Based on the Project's current level of design, the Project would result in a permanent incorporation of the entire property (1.0 acre, or 100 percent of the property) from the Northwestern National Bank – North American Office (see Figure A8-40) with the loss of all buildings on the property. This would be necessary to allow for Project elements (LRT tracks and associated infrastructure), roadway reconstruction, and sidewalk improvements.

A Section 106 finding of Adverse Effect has been made with respect to the Project impacts at the Northwestern National Bank – North American Office. Permanent incorporation of the entire property with loss of all buildings would be required to construct the LRT tracks, boulevard, sidewalks, and bikeways along 7th St N and roadway reconstruction, and bikeway and sidewalk connections along N 7th St N and Oak Lake Ave. Permanent incorporation includes acquisition and removal of all buildings totaling 1.0 acre.

Based on the Section 106 finding of Adverse Effect, FTA has made a preliminary determination that a Section 4(f) direct use (greater than a *de minimis* use) pursuant to this Section 4(f) property would result from Project implementation. The Council evaluated alternatives that would avoid the use of this property to determine whether any would be feasible and prudent. The alternatives analysis is presented in Section 8.7. Measures to minimize harm to this property are presented in Section 8.8.



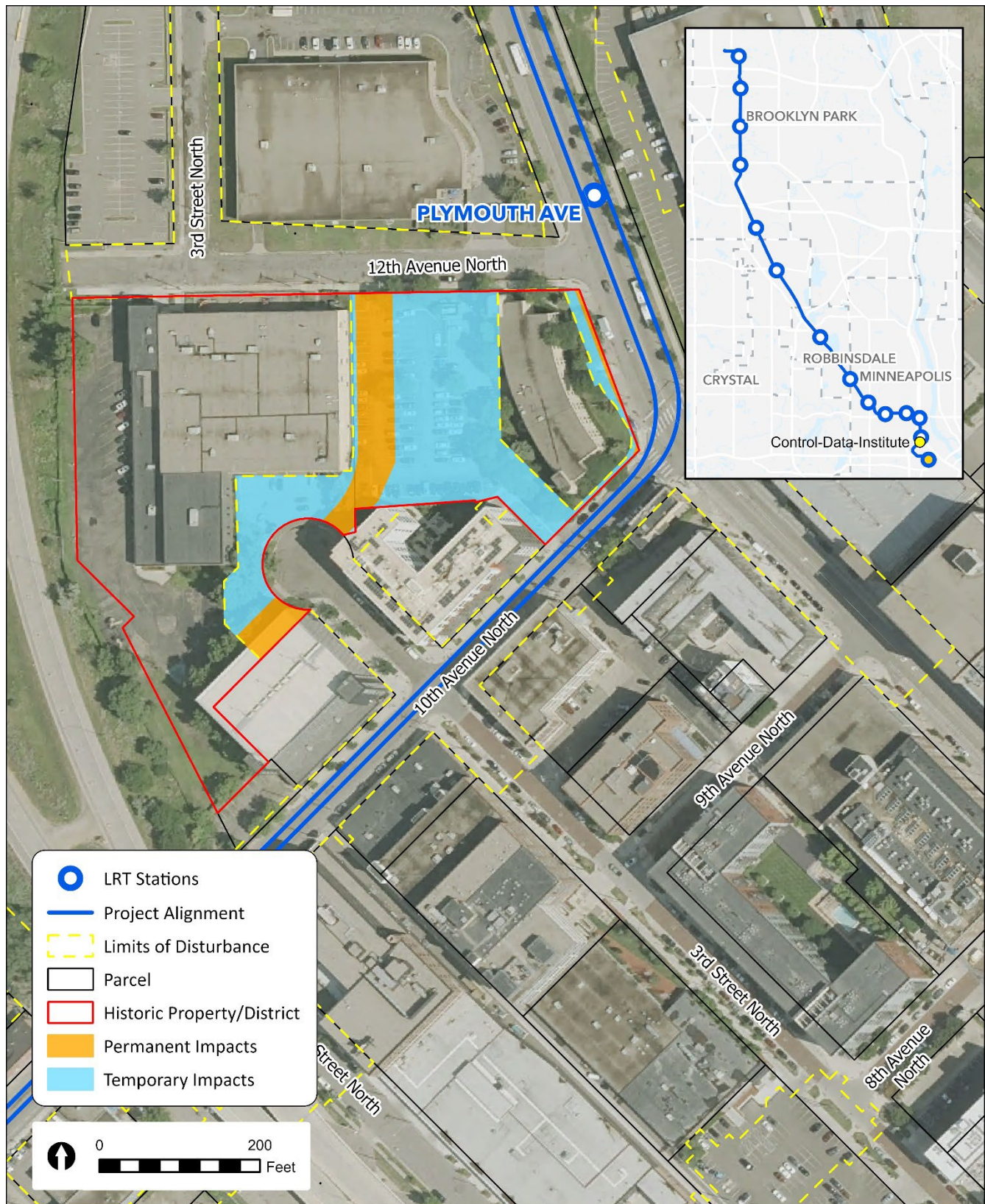
Figure A8-38 Franklin Co-Operative Creamery Association North Side Complex



Note: The aerial and building footprint were captured with different orthophotograph methodologies. The result is a visual building lean and/or distortion in the aerial, while the historic property outline shows the true footprint.



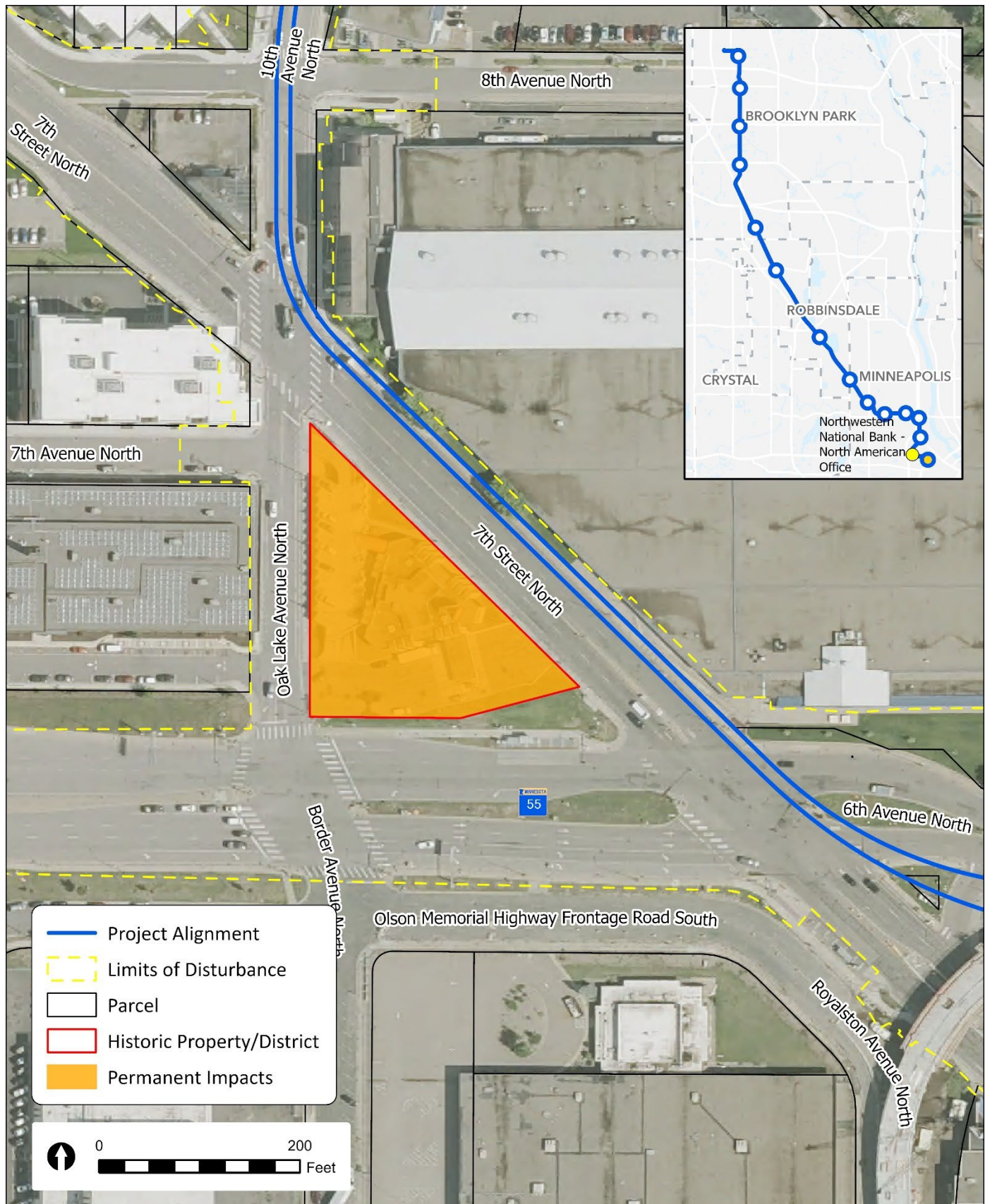
Figure A8-39 Control-Data Institute and Control Data – Northside Manufacturing Plant



Note: The aerial and building footprint were captured with different orthophotograph methodologies. The result is a visual building lean and/or distortion in the aerial, while the historic property outline shows the true footprint.



Figure A8-40 Northwestern National Bank – North American Office





8.5.2.17 Osseo Branch, St. Paul Minneapolis & Manitoba Railway Historic District

The Osseo Branch, StPM&M Historic District is an approximately 13-mile-long segment of rail line that is generally 100 feet wide from the City of Minneapolis to the City of Osseo, including the Cities of Brooklyn Park, Crystal, and Robbinsdale. The Osseo Branch, StPM&M Historic District is eligible for listing in the NRHP under Criterion A. Based on the current level of design, the Project would not result in permanent or temporary incorporation of land from the Osseo Branch, StPM&M Historic District.

A Section 106 finding of No Adverse Effect has been made with respect to the Project impacts at the Osseo Branch, StPM&M Historic District. Based on the Section 106 finding of No Adverse Effect, FTA has determined that no Section 4(f) use pursuant to this Section 4(f) property would result from Project implementation.

8.5.2.18 Minneapolis Warehouse Historic District

The Minneapolis Warehouse Historic District, located in the City of Minneapolis, is bounded by 1st Ave N, 1st St N, 10th Ave, and 6th St. This historic district is listed in the NRHP under Criteria A and C. The historic district is 116.6 acres. Based on the current level of design, the Project would result in the temporary occupancy of 3.91 acres of property from the Minneapolis Warehouse Historic District during construction (see Figure A8-41). This would be necessary to allow for Project elements (LRT tracks, station, and associated infrastructure), roadway reconstruction, and sidewalk improvements.

A Section 106 finding of No Adverse Effect has been made with respect to the Project impacts at the Minneapolis Warehouse Historic District. Based on the Section 106 finding of No Adverse Effect, FTA has determined that a temporary occupancy exception would apply, and no Section 4(f) use would result from Project implementation.

8.5.2.19 Cameron Transfer & Storage Building

The Cameron Transfer & Storage Building is located in the City of Minneapolis at 756 4th St N. This historic building is listed in the NRHP under Criterion C. The historic building is 0.2 acre. Based on the current level of design, the Project would not result in permanent or temporary incorporation of land from the Cameron Transfer & Storage Building (see Figure A8-42).

A Section 106 finding of No Adverse Effect has been made with respect to the Project impacts at the Cameron Transfer & Storage Building. Based on the Section 106 finding of No Adverse Effect, FTA has determined that no Section 4(f) use pursuant to this Section 4(f) property would result from Project implementation.

8.5.2.20 St. Paul Minneapolis & Manitoba Railway/Great Northern Railway Historic District (Minneapolis)

The StPM&M/GN Historic District is located in the City of Minneapolis. This historic district is eligible for listing in the NRHP under Criterion A. Based on the current level of design, the Project would not result in permanent or temporary occupancy of property from the StPM&M/GN Historic District during construction.

A Section 106 finding of No Adverse Effect has been made with respect to the Project impacts at the StPM&M/GN Historic District. Based on the Section 106 finding of No Adverse Effect, FTA has determined that no Section 4(f) use pursuant to this Section 4(f) property would result from Project implementation.



Figure A8-41 Minneapolis Warehouse Historic District

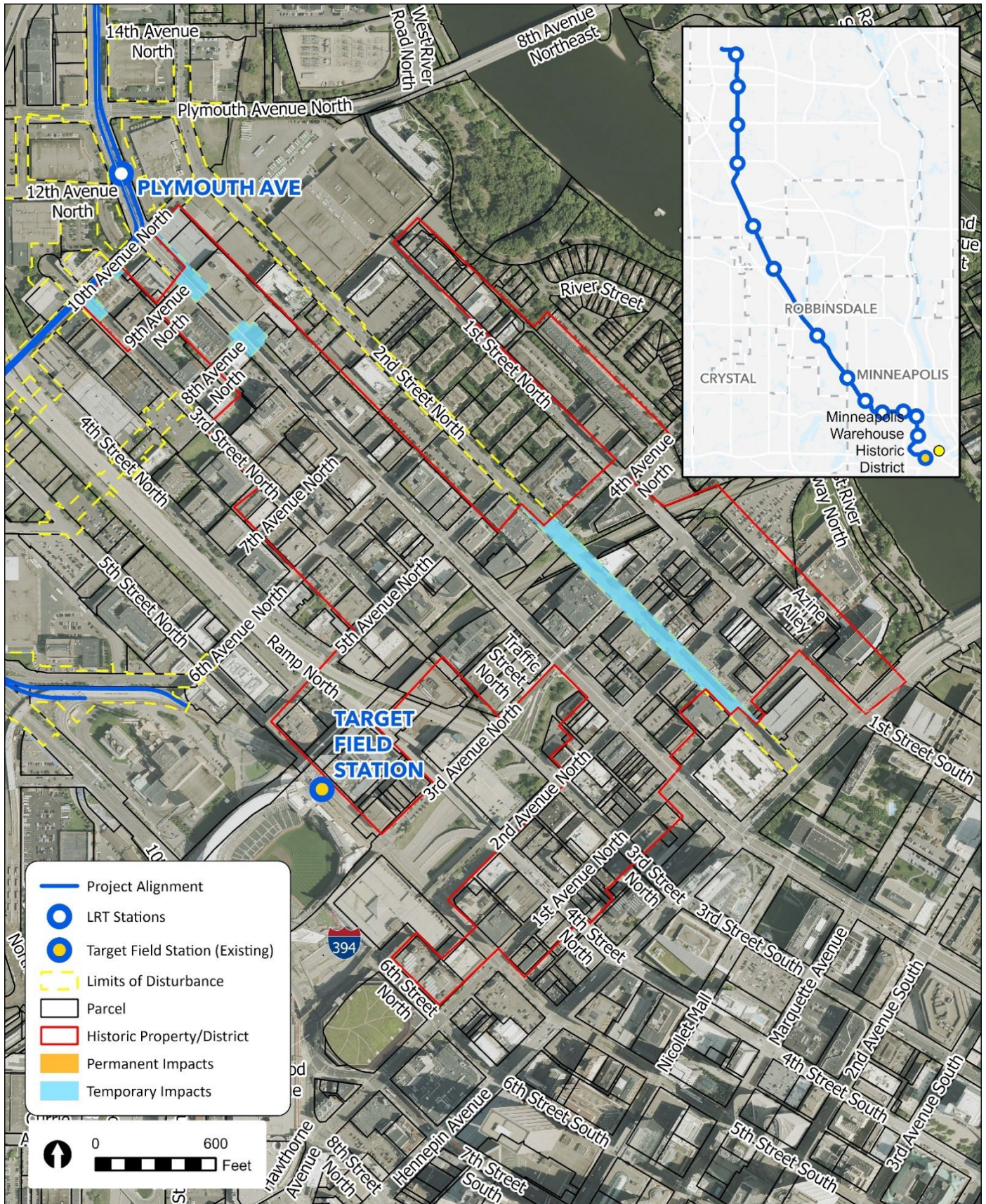




Figure A8-42 Cameron Transfer & Storage Building



Note: The aerial and building footprint were captured with different orthophotograph methodologies. The result is a visual building lean and/or distortion in the aerial, while the historic property outline shows the true footprint.



8.5.2.21 Saint Anthony Falls Historic District

The Saint Anthony Falls Historic District, located in the City of Minneapolis, is generally bound by 2nd St on the west; south of Plymouth Ave N and Marshall St NE on the north, including all of Nicollet Island; University Ave SE on the east; and 10th Ave S/6th Ave SE on the south/southeast. This historic district is listed in the NRHP under Criteria A, C, and D. The historic district is 484.3 acres. Based on the current level of design, the Project would result in the temporary occupancy of 3.64 acres of property from the Saint Anthony Falls Historic District during construction (see Figure A8-43). This would be necessary to allow for roadway restriping along 2nd Ave between 10th Ave N and Hennepin Ave.

A Section 106 finding of No Adverse Effect has been made with respect to the Project impacts at the Saint Anthony Falls Historic District. Based on the Section 106 finding of No Adverse Effect, FTA has determined that a temporary occupancy exception would apply, and no Section 4(f) use would result from Project implementation.

8.6 De Minimis Impacts

After considering minimization measures and the required coordination process described in 23 USC § 138, FTA may find that a use will result in only a *de minimis* impact to a Section 4(f) resource. The requirements of Section 4(f) are satisfied if it is determined by the FTA that a transportation project would have only a *de minimis* impact on the Section 4(f) resource.

The Council would implement the following standard mitigation measures at all affected properties:

- Financial compensation for the loss of property in accordance with the Uniform Act and based on fair market appraisal;
- Avoidance, conservation, and replacement of protected trees wherever practical;
- Implementation and monitoring of BMPs during construction to minimize noise, vibration, and dust levels;
- Maintenance of bicycle and pedestrian traffic via detour routes around construction sites; and
- Restoration of construction sites to a condition at least as good as that which existed prior to construction.

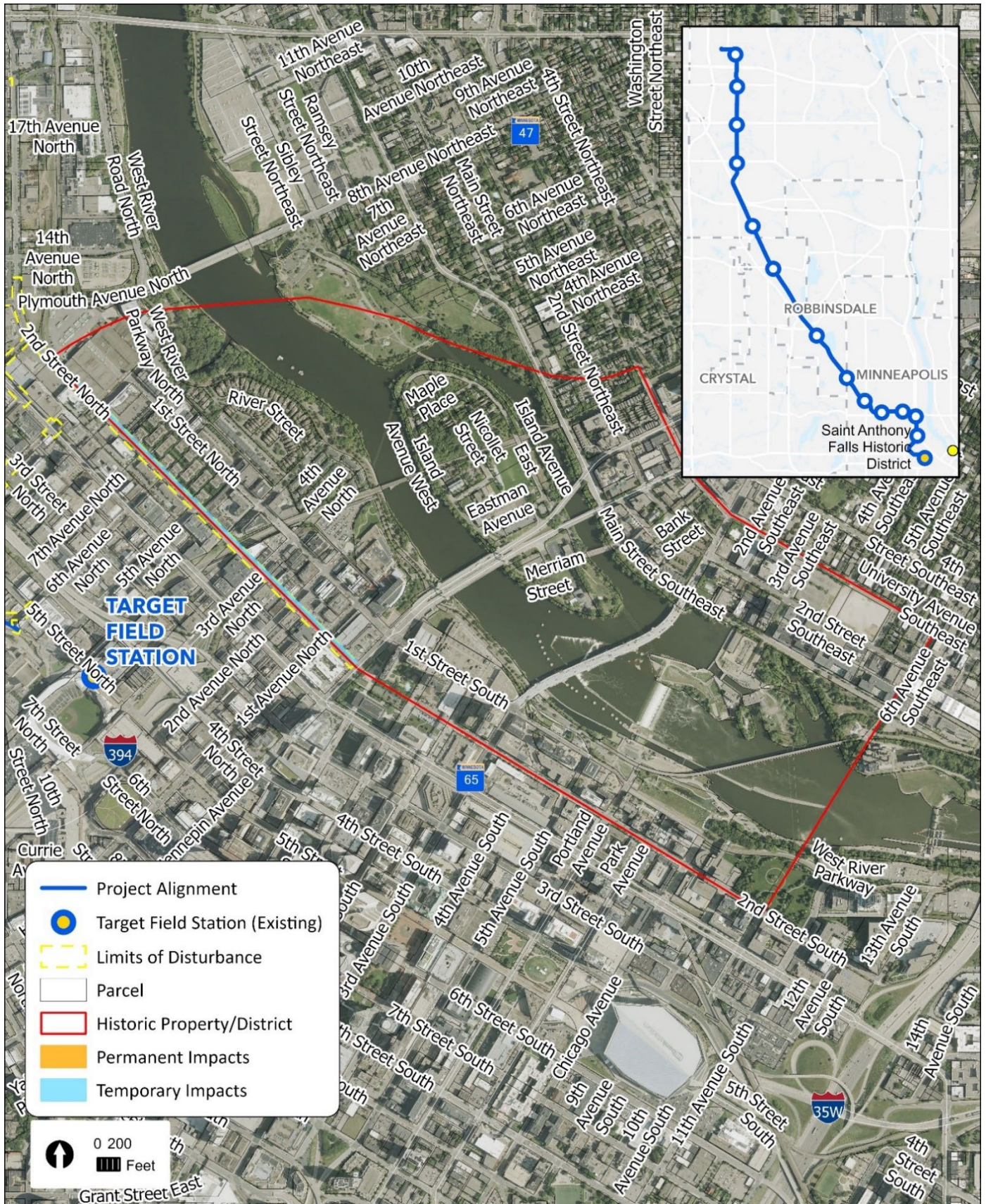
Based on the measures to minimize potential adverse effects, FTA has made preliminary determinations of *de minimis* impact for the following nine properties:

- College Park
- NHCC athletic fields
- Tessman Park
- Wirth/Victory Memorial Pkwy Regional Trail
- West Broadway Ave Residential Historic District
- North Community YMCA
- Reno Land and Improvement Company Addition Historic District
- Sundseth Undertaking/Sundseth-Anderson Funeral Home
- Control-Data Institute and Control Data – Northside Manufacturing Plant

FTA has coordinated with the OWJs responsible for these resources regarding the intent to make *de minimis* use determinations. After publication, the public will have a 30-calendar-day period to provide comment on the Draft Section 4(f) and Section 6(f) Evaluation. FTA will seek written concurrence from the OWJs that the project will not adversely affect the activities, features, and attributes that qualify the property for protection under Section 4(f) and make final determinations on *de minimis* use of these resources after review of public comments on this document. FTA will publish a Final Section 4(f) and Section 6(f) Evaluation with the Amended ROD.



Figure A8-43 Saint Anthony Falls Historic District





8.7 Avoidance Alternatives Analysis

Avoidance alternatives are analyzed for Section 4(f) resources when the use of the resource is greater than *de minimis* use. The Project would require Section 4(f) direct use (greater than *de minimis* use) on the following two historic properties:

- **Forest Heights Addition Historic District:** Acquiring nine properties (2.29 acres) within the historic district (1.5 percent of district), four of which are contributing to the significance of the historic district.
- **Northwestern National Bank – North American Office:** Acquisition of historic property (1.0 acre, or 100 percent) and loss of all buildings on site. The historic significance of this property is related to a historic event.

Before approving the use of Section 4(f) property, FTA must determine that there is no feasible and prudent alternative that avoids such use. A feasible and prudent avoidance alternative avoids using Section 4(f) property and does not cause other severe problems of a magnitude that substantially outweighs the importance of protecting the Section 4(f) property. An alternative is infeasible if it cannot be built as a matter of sound engineering judgment. An alternative is not prudent if:

1. It would compromise the project to a degree that it is unreasonable to proceed with the project in light of its stated purpose and need;
2. It would result in unacceptable safety or operational problems;
3. After reasonable mitigation, it would still cause:
 - a. Severe social, economic, or environmental effects;
 - b. Severe disruption to established communities;
 - c. Severe, disproportionate effects on low-income or minority populations; or
 - d. Severe effects on environmental resources protected under other federal statutes.
4. It would result in additional construction, maintenance, or operational costs of an extraordinary magnitude;
5. It would cause other unique problems or unusual factors; or
6. It would involve multiple factors in 1 through 5 above that, while individually minor, could cumulatively cause unique problems or effects of extraordinary magnitude.

FTA evaluated a No-Build Alternative, Enhanced Bus Alternative, and a Deep Tunnel Alternative in the Section 4(f) Evaluation published in 2016 and found that, while feasible, they would not be prudent alternatives. The No-Build and Enhanced Bus alternatives would not meet the purpose and need for the Project, and the Deep Tunnel Alternative would have construction costs of an extraordinary magnitude and excessive impacts on residential property. In addition, a BRT Alternative was evaluated in the Bottineau Transitway Alternatives Analysis and was eliminated from consideration because the forecast total ridership was estimated to be approximately 25 percent lower than LRT, connections from BRT to other transit modes/facilities would be less convenient than LRT, and BRT would not have the capacity to handle event crowds as well as LRT. BRT offers high frequency service and includes a dedicated guideway and several amenities including off-board ticketing, multipoint vehicle access, and articulated vehicles. The footprint of a BRT Alternative would be similar to that of LRT and would not avoid Section 4(f) use of or the contributing resources to the Forest Heights Addition Historic District. As a result, the BRT Alternative does not qualify as an avoidance alternative.

The Council evaluated modifications to the design, including reducing the cross-sectional width and shifting the alignment to avoid the use of the five Section 4(f) properties (the Northwestern National Bank – North American Office building and the four contributing resources of the Forest Heights Addition Historic District). Routing the LRT alignment on different streets was also considered.

The sections below identify and evaluate the avoidance alternatives.



8.7.1 Design Modifications

Two avoidance alternatives were identified to avoid use of the Northwestern National Bank – North American Office property.

- Avoidance Alternative 1 – Elimination of the SB Bus Lane at Northwestern National Bank – North American Office
- Avoidance Alternative 2 – Eastward Alignment Shift at Northwestern National Bank – North American Office

Within the Forest Heights Addition Historic District, the Council evaluated shifting the alignment and eliminating or relocating the stations to avoid use of the four contributing resources. However, due to the prevalence of contributing resources in the Forest Heights Addition Historic District and the complex roadway configuration, design modifications would not avoid the use of Section 4(f) resources. The Project Alignment in the Forest Heights Addition Historic District represents a least harm alternative. The design modifications evaluated to avoid use of Northwestern National Bank – North American Office and the Forest Heights Addition Historic District’s contributing resources are further described below.

8.7.1.1 Northwestern National Bank – North American Office

The Northwestern National Bank – North American Office property is a triangular parcel bounded by Olson Memorial Highway to the south, Oak Lake Ave to the west, and N 7th St to the northeast. The bank building fronts N 7th St and the Northwestern National Bank – North American Office parking structure and ramps front Oak Lake Ave (see Figure A8-44).

The Project improvements would extend approximately 17 feet into the Northwestern National Bank – North American Office property along N 7th St into the transportation right-of-way to accommodate multi-modal Project improvements designed in accordance with the City of Minneapolis Street Design Guidelines (see Figure A8-45, Figure A8-46, and Figure A8-47):

- 28 feet LRT guideway
- 13 feet southbound bus only lane
- 24 feet for north- and southbound traffic thru lanes
- 13 feet north- and southbound boulevards between traffic and bikeway
- 12 feet for north and southbound bikeway and sidewalk

The proposed cross-section for N 7th St must accommodate a 28-foot LRT guideway, southbound bus only lane, southbound thru lane, northbound thru lane, boulevards, and a bikeway and sidewalk on each side of 7th St. Avoidance Alternative 1 includes elimination of the southbound bus only lane. However, traffic analysis shows that the bus lane is required to mitigate traffic impacts to the south- and northbound thru lanes. The boulevards, bikeways, and sidewalks on each side of N 7th St align with the City’s Street Design Guidance. Reducing the cross-section to eliminate the bus lane would have significant traffic impacts along N 7th St. Converting the bikeway and sidewalk on each side of the roadway to a reduced width shared used path was not acceptable to the City of Minneapolis and would not meet minimum design criteria. In addition, eliminating the boulevards (buffers between the traffic lanes and bikeways) results in an overall 9-foot reduction in width because a 4-foot buffer must be provided between traffic lanes and bikeways. Implementation of shared use paths in lieu of separate sidewalks and bikeways would reduce the cross-sectional width by 4 feet. This does not achieve the required 17-foot reduction required to avoid impacts to the Northwestern National Bank – North American Office parcel.

Avoidance Alternative 2 includes shifting the horizontal alignment by 17 feet to the east, adjacent to the Metro Transit Heywood Garage. However, a shift further east is not practicable adjacent to the Metro Transit Heywood Garage without impacting the existing fire egress doors and impacting ADA-accessible routes from N 7th St to the Metro Transit Lost and Found. In summary, the baseline geometry of the facilities required along N 7th St created an unavoidable impact to the Northwestern National Bank – North American Office Building.



Figure A8-44 Northwestern National Bank – North American Office Location

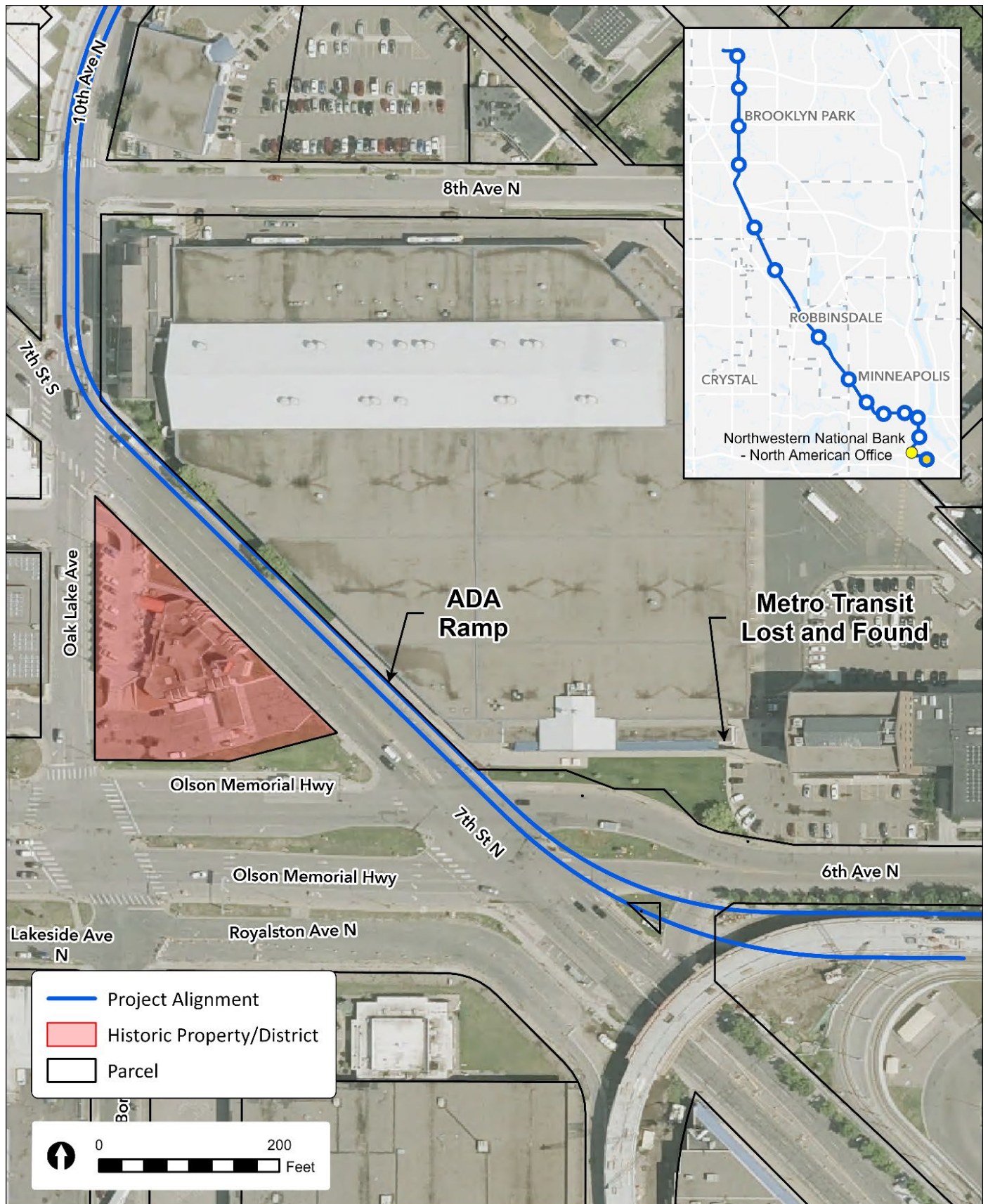




Figure A8-45 Project Alignment at Northwestern National Bank – North American Office

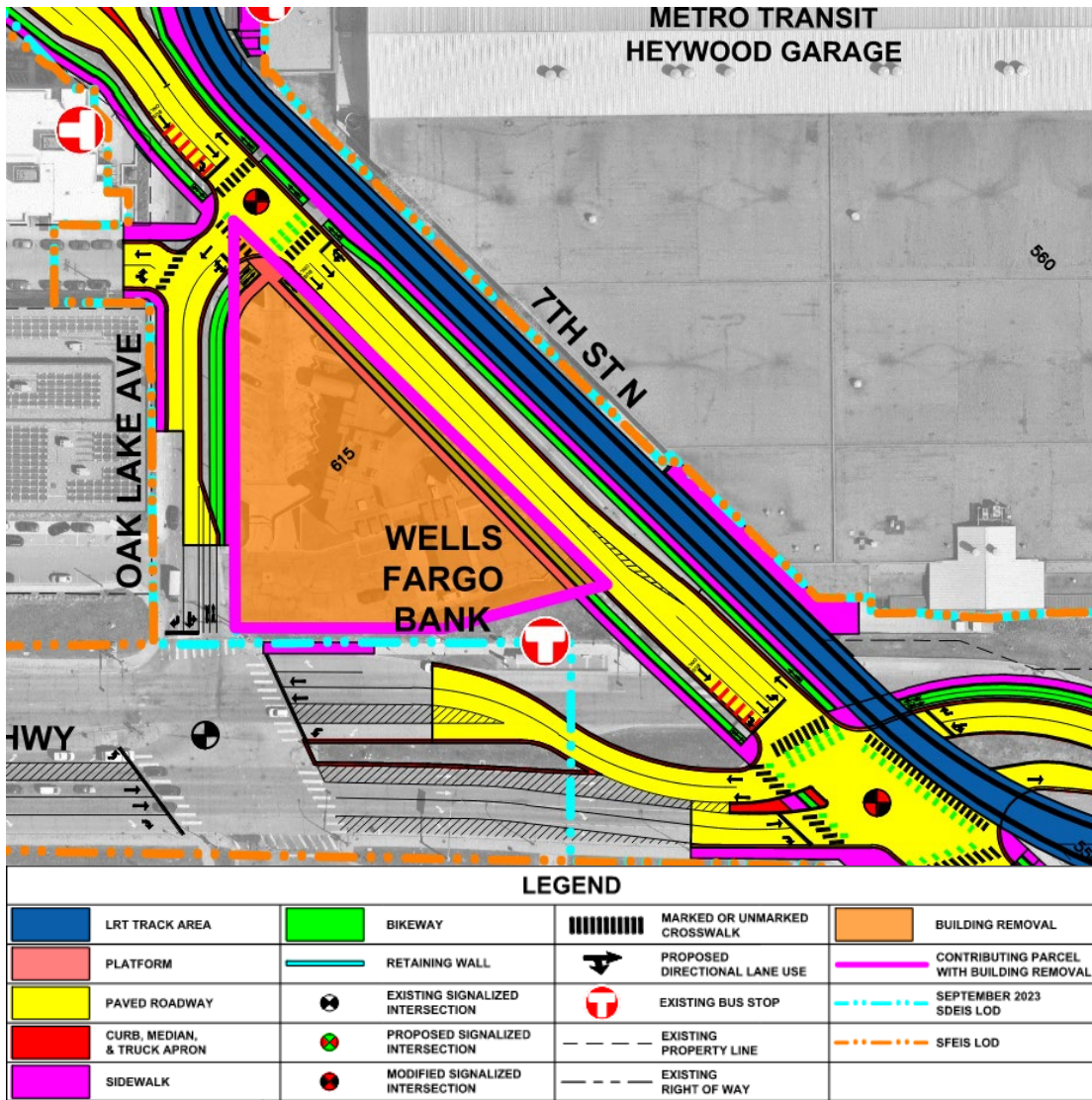


Figure A8-46 Project Cross-Section at Northwestern National Bank – North American Office

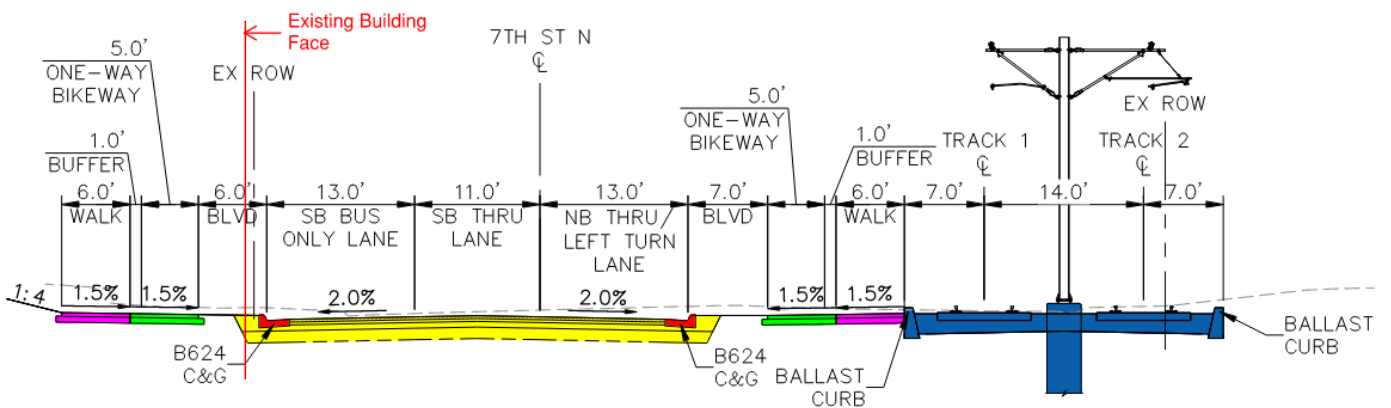
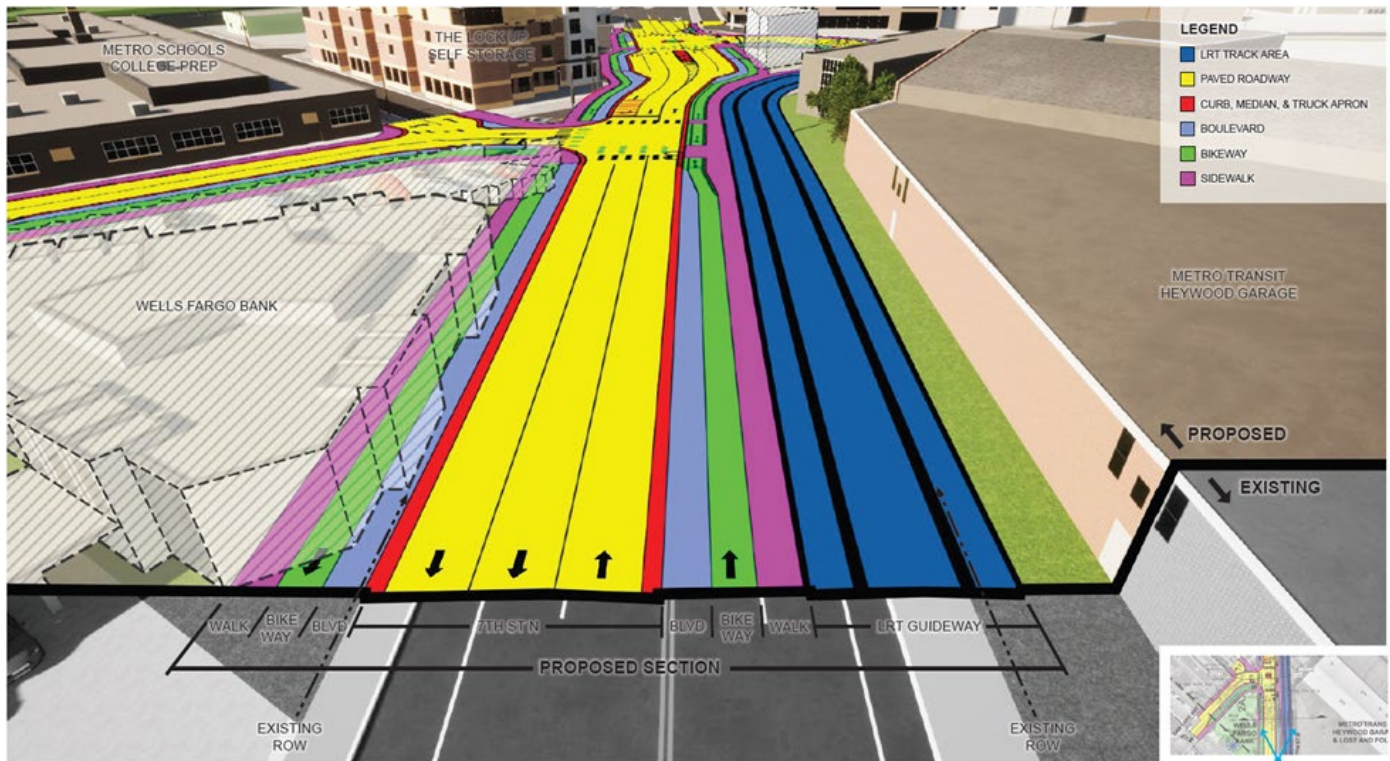




Figure A8-47 Project Corridor at Northwestern National Bank – North American Office



8.7.1.2 Forest Heights Addition Historic District

The Forest Heights Addition Historic District is bounded by 26th Ave N, Penn Ave N, Golden Valley Rd, and Irving Ave N. The existing transportation right-of-way in the historic district includes the roadway and sidewalks up to the face of the buildings on either side, with historic properties on both sides of the road (see Figure A8-48). The Project Alignment minimizes use of Section 4(f) properties in the Forest Heights Addition Historic District through a reduction in traffic lanes (from four existing lanes to one lane in each direction on W Broadway Ave). Despite this design change, the stations on western and eastern end of the district would result in use of the four contributing resources.

Penn Ave Station

The design of LRT facilities along W Broadway Ave through the Penn Ave intersection was one of the most challenging design locations of the Project’s planning efforts since Penn Ave intersects W Broadway Ave at a severe skew (approximately 45 degrees) and includes a fifth leg with McNair Ave. Additionally, the Penn Ave Station is designed to facilitate convenient transfers at the existing METRO BRT C Line station. The existing right-of-way along W Broadway Ave is relatively narrow and includes the roadway and sidewalks up to the face of the buildings, with historic buildings on both sides. Even with narrowing the roadway from four general purpose lanes to two, there was not enough width in the right-of-way to accommodate all needed elements including left turn lanes, which are required for signal phasing and intersection level of service (see Figure A8-49).

The Council evaluated seven options to avoid use of historic properties for the Penn Ave Station including relocating Penn Ave Station to the west and east and a grade-separated LRT. The constrained cross-section at W Broadway Ave and Penn Ave accommodates the width needed for the LRT guideway, emergency access, one lane of vehicular travel, and sidewalks in each direction. The south side of W Broadway Ave has far fewer historic building/business impacts than the north side, which is a nearly continuous row of sidewalk fronting businesses including other contributing parcels. Project guideway shifts to the north would require greater use of historic properties. The



removal of left turn lanes at the intersection, required for proper signal operations, would not avoid use of historic properties.

Shifting the station further west toward 26th Ave would affect multi-modal transfers and have substantial impacts on properties on the west side of W Broadway Ave including commercial and residential buildings along with the same two contributing resources. Shifting the station east of the intersection would require use of the same two contributing resources. A grade-separated station in this location was not advanced due to unacceptable traffic and roadway impacts caused by the structural columns of needed for the aerial guideway. These design options are shown in Attachment A included in this document.

Design efforts focused on track alignments and intersection designs aimed at minimizing building impacts, most notably the two contributing parcels on the south side of W Broadway Ave at Penn Ave. One option that was explored was modifying the Five Points building to setback the first floor. A structural assessment of the building deemed this infeasible.

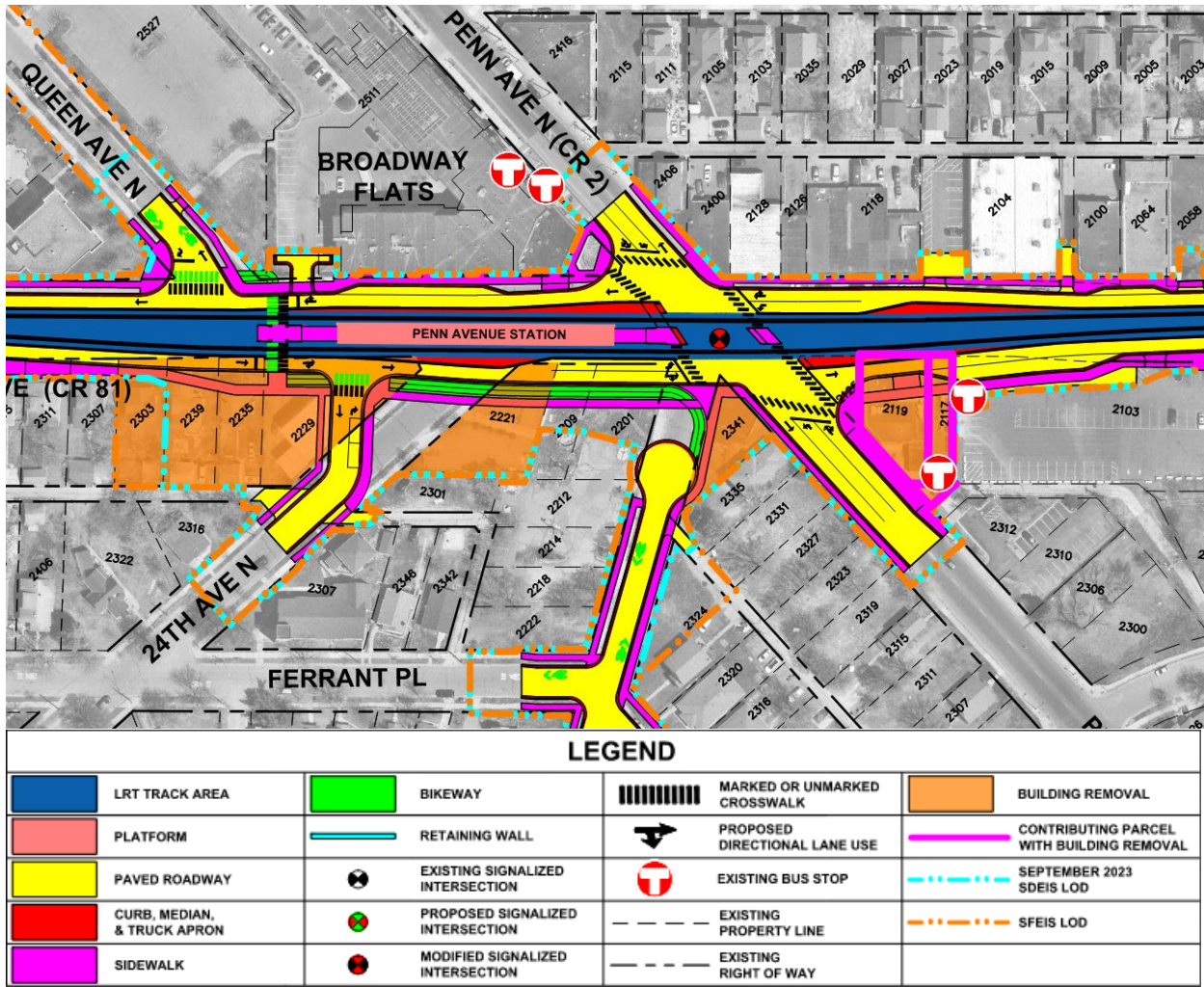


Figure A8-48 Forest Heights Addition Historic District Contributing Resources





Figure A8-49 Penn Ave Station Project Design

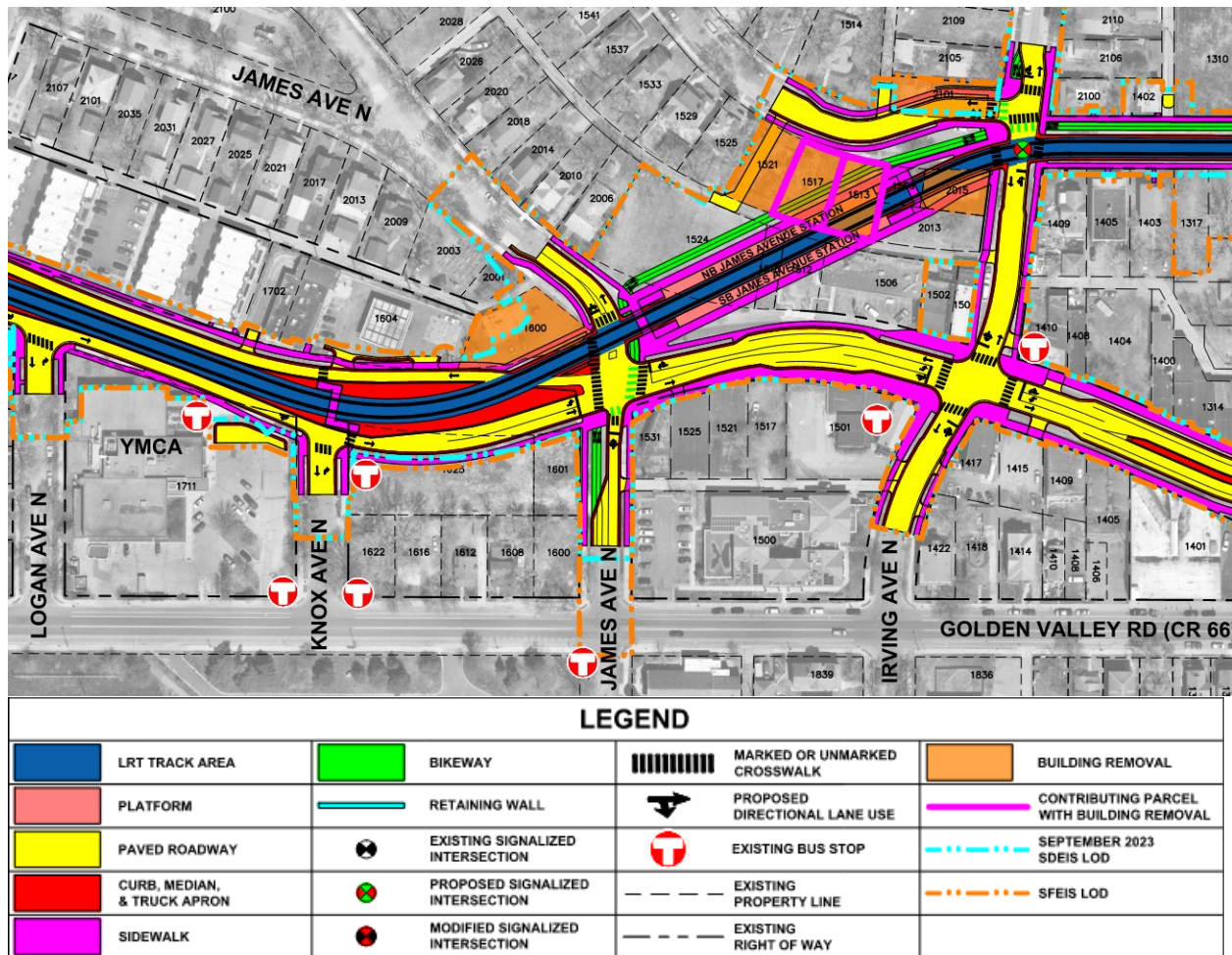


James Ave Station

The James Ave Station directly impacts 1513 and 1517 Hillside Ave N, two contributing resources to the Forest Heights Addition Historic District (see Figure A8-50). The Council evaluated elimination of the station in this location; however, the reduction in the footprint would not be enough to avoid the impacts to 1513 and 1517 Hillside Ave N. The Council also evaluated flattening the curve to avoid use of these two resources. However, this design modification would not eliminate use at 1517 Hillside Ave N but would require use of 1409 N 21st Ave, which is also a contributing resource. Shifting the Project Alignment to the east between Irving Ave N and Girard Ave N, with or without the station, would result in use of 1409 N 21st Ave, 1405 N 21st Ave, 1500 W Broadway Ave, and 1502 W Broadway Ave, which are also contributing resources to the Forest Heights Addition Historic District. Shifting the alignment to the west onto W Broadway Ave would require use of the YMCA, a contributing resource. Design modification drawings for the James Ave Station are presented in Attachment A included in this document.



Figure A8-50 James Ave Station Design



8.7.2 Route Alternatives

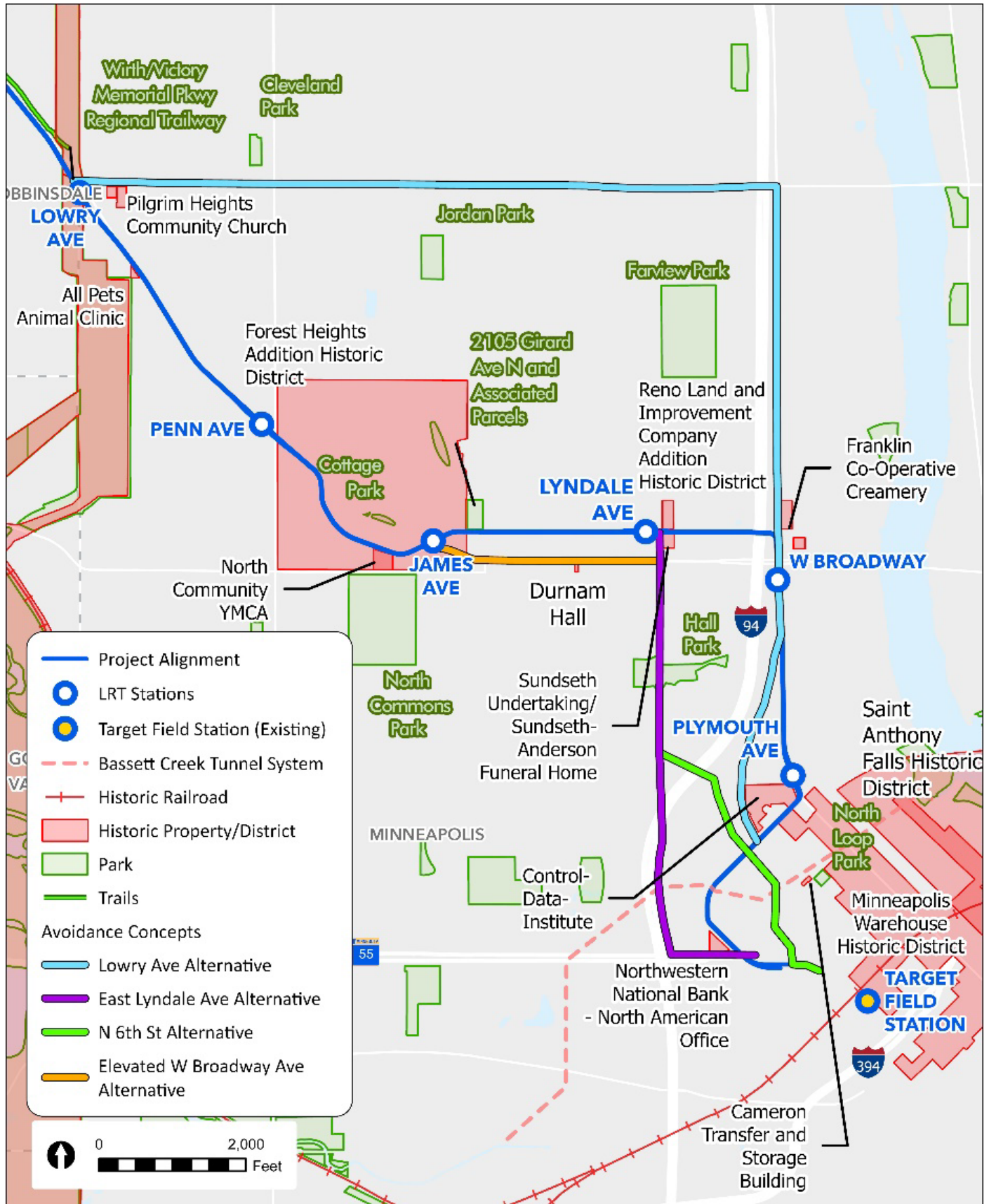
The Council evaluated alternative routes to avoid use of the five historic properties and considered at-grade and grade-separated alignments along these routes (see Figure A8-51). The following Avoidance Alternatives were identified and are discussed below:

- Avoidance Alternative 3 – Olson Memorial Hwy to E Lyndale Ave
- Avoidance Alternative 4 – N 6th St
- Avoidance Alternative 5 – Grade-Separated Alignment on W Broadway Ave
- Avoidance Alternative 6 – Lowry Ave

Avoidance Alternative 6 – Lowry Ave is the only alternative that would avoid use of the five contributing resources affected by the Project Alignment, although it is unknown if it would avoid use of all historic resources since historic property surveys have not been conducted for the Lowry Ave alignment. A combination of Avoidance Alternative 3 or 4, with the grade-separated alignment on W Broadway Ave, would avoid use of Northwestern National Bank – North American Office and 1513 and 1517 Hillsdale Ave N, but the two contributing resources on the western end of the Forest Heights Addition Historic District would still be affected.



Figure A8-51 Avoidance Alternative Concepts





These avoidance alternatives are evaluated for feasibility and prudence in the following section. An at-grade alignment on W Broadway Ave does not constitute an avoidance alternative as it would require use of 1501 W Broadway Ave, 1417 W Broadway Ave, 1409 W Broadway Ave, 1405 W Broadway Ave, 1401 W Broadway Ave, and 1400 W Broadway Ave, which are all contributing resources in the Forest Heights Addition Historic District (see Attachment A included in this document).

8.7.3 Evaluation of Avoidance Alternatives

8.7.3.1 Avoidance Alternative 1 – Elimination of Southbound Bus Only Lane at Northwestern National Bank – North American Office

Evaluation of Feasibility

While elimination of a southbound bus only lane would cause safety and operational issues and be inconsistent with City of Minneapolis policies and plans, FTA and the Council have determined that this alternative would be a feasible avoidance alternative.

Evaluation of Prudence

i. Effectiveness in Meeting Purpose and Need

Determining whether an alternative is prudent requires an assessment of whether or not the alternative would compromise the project to a degree that it is unreasonable to proceed in light of the Project’s stated purpose and need (see Chapter 1). FTA and the Council concluded that, while this alternative would avoid the Northwestern National Bank – North American Office property, it would be inconsistent with City of Minneapolis and Metro Transit plans and policies. The southbound bus lane is required for the METRO BRT D Line, an 18-mile line connecting the Mall of America to the City of Brooklyn Center via South, Downtown, and North Minneapolis. The City of Minneapolis prioritizes walking, biking, and transit over motor vehicles and has established a Complete Streets policy to rebalance its transportation network and provide safe and efficient access to destinations. Based on an assessment of purpose and need, this alternative would not fully meet the long-term regional transit mobility and local accessibility needs while providing efficient, travel-time competitive transit service that supports economic development goals and objectives of local, regional, and statewide plans.

ii. Safety and Operational Considerations

METRO BRT D Line operates with frequent headways on N 7th St (approximately 10 to 15 minute headways). Eliminating the exclusive bus lane would require buses to operate in a single lane of mixed traffic, which would compromise on-time performance and create safety concerns as buses merge into a single lane of mixed traffic. As indicated Chapter 3, the roadways adjacent to the Project Alignment throughout the City of Minneapolis are expected to operate at or above capacity. Elimination of the southbound bus lane would exacerbate traffic congestion and result in unacceptable queue lengths at the intersection of N 7th St and Olson Memorial Hwy.

iii. Social, Economic, Environmental, and Community Impacts

Implementation of shared use paths in lieu of separate sidewalks and bikeways and elimination of the boulevard would be inconsistent with the City of Minneapolis policy of prioritizing walking and biking and providing landscaping and street design consistent with established best practices.

iv. Cost

None identified.

v. Unique Problems or Unusual Factors

None identified.

vi. Cumulative Consideration Factors

A final consideration of prudence takes into account multiple factors that on their own may be considered minor but would cumulatively result in unique problems or project impacts of extraordinary magnitude. Cumulatively, this



avoidance alternative would not fully meet the Project’s purpose and need and would result in adverse effects on safe BRT operations and vehicular traffic in a congested area of Downtown Minneapolis.

Avoidance Alternative Determination

This alternative would avoid use of the Northwestern National Bank – North American Office property and would be feasible but would not be prudent under the criteria defined in Section 8.7 for feasible and prudent avoidance alternatives.

8.7.3.2 Avoidance Alternative 2 – Alignment Shift to the East at Northwestern National Bank – North American Office

Evaluation of Feasibility

While shifting the alignment to the east at Northwestern National Bank-North American Office would cause safety concerns, FTA and the Council have determined that this alternative would be a feasible avoidance alternative.

Evaluation of Prudence

i. Effectiveness in Meeting Purpose and Need

This alternative would meet the Project’s purpose and need.

ii. Safety and Operational Considerations

Shifting the alignment by 17 feet to the east would impact the Metro Transit Heywood Garage and block four fire egress doors on N 7th St and an ADA-accessible ramp from N 7th St to the Metro Transit Lost and Found, rendering the facility unusable in its current configuration. The Project Alignment is also constrained by minimum sight-distance requirements, with the pinch point at the southwest corner of the Heywood Garage. The Project Alignment cannot shift any further to the east in that location without unsafe conditions, violating the sight-distance requirements for LRT and requiring demolition of additional properties (e.g., Lock Up Storage). The intersection at N 7th St and Oak Lake Ave is also a constraining point. The design standards for roadways at this intersection require vehicles to be able to successfully make turning movements at the intersection without tracking outside of their lanes. The skew of this intersection makes those turning movements tight, and realigning the intersection away from the Northwestern National Bank – North American Office property would make the turning movements tighter, which would not comply with safety standards.

iii. Social, Economic, Environmental, and Community Impacts

None identified.

iv. Cost

None identified.

v. Unique Problems or Unusual Factors

None identified.

vi. Cumulative Consideration Factors

None identified.

Avoidance Alternative Determination

This alternative would avoid use of the Northwestern National Bank – North American Office property and would be feasible but would not be prudent under the criteria defined in Section 8.7 for feasible and prudent avoidance alternatives.



8.7.3.3 Avoidance Alternative 3 – Olson Memorial Hwy to E Lyndale Ave

Evaluation of Feasibility

While there are constructability issues with an alignment routed on Olson Memorial Hwy/N 6th Ave and E Lyndale Ave, FTA and the Council have determined that this alternative would be a feasible avoidance alternative.

Evaluation of Prudence

i. Effectiveness in Meeting Purpose and Need

This alternative would meet the Project's purpose and need.

ii. Safety and Operational Considerations

None identified.

iii. Social, Economic, Environmental, and Community Impacts

Residents were opposed to routing the LRT alignment on E Lyndale Ave and through a relatively quiet neighborhood due to concerns over noise, vibration, safety, and adverse effects on neighborhood character and visual quality. It would also likely result in at least a *de minimis* Section 4(f) use of Hall Park.

iv. Cost

None identified.

v. Unique Problems or Unusual Factors

E Lyndale Ave is constructed on a causeway composed of lightweight fill and cable-stayed retaining walls. This system is over 50 years old and is not suitable to support LRT loadings and vibrations. Reconstruction of the retaining walls and roadway (a feeder to I-94) would last for an extended period (likely a minimum of one full construction season or more). Reconstruction of this area would impact a 72-inch stormwater trunk pipe under I-94 at the foot of the retaining walls. The retaining wall work and relocation of the impacted stormwater trunk pipe would require closing several lanes of I-94 for the duration of construction.

vi. Cumulative Consideration Factors

None identified.

Avoidance Alternative Determination

This alternative would avoid use of the Northwestern National Bank – North American Office property and would be feasible but would not be prudent under the criteria defined in Section 8.7 for feasible and prudent avoidance alternatives.

8.7.3.4 Avoidance Alternative 4 – N 6th St

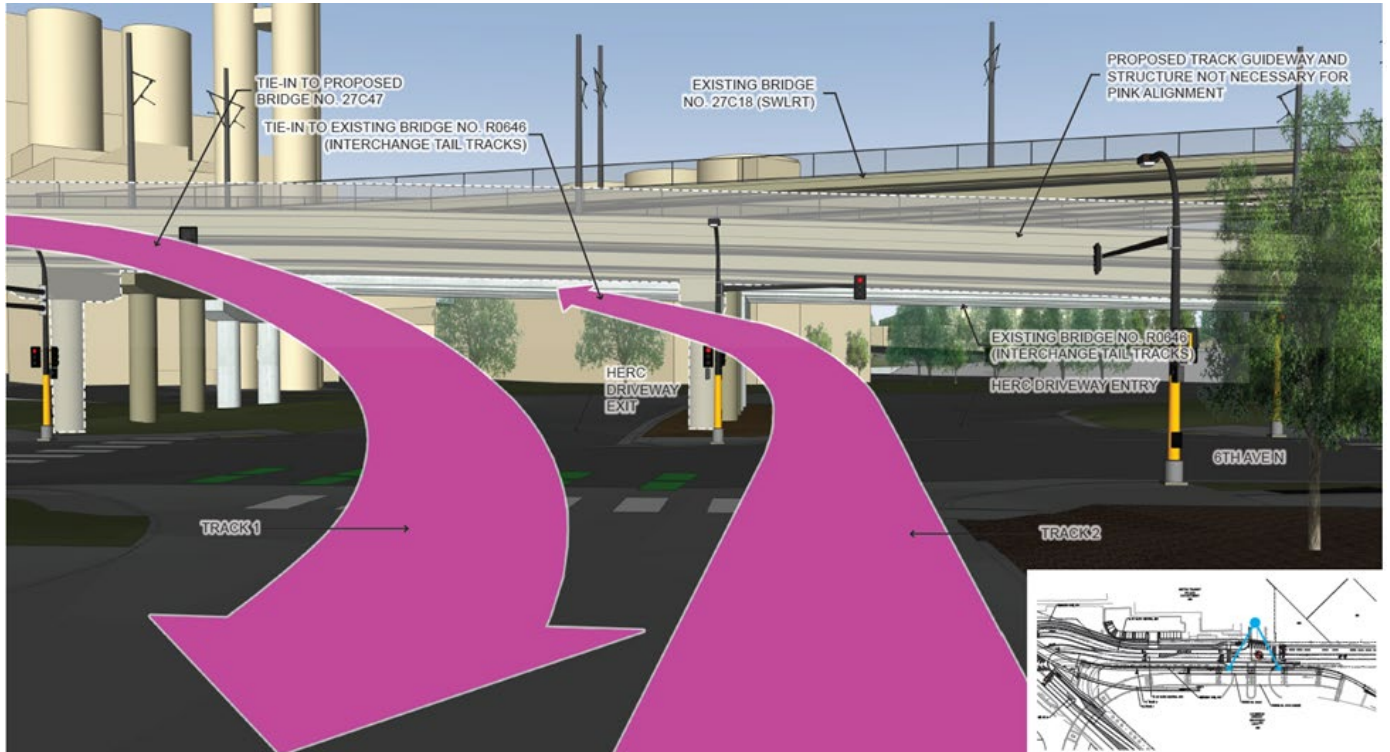
Evaluation of Feasibility

The Northwestern National Bank – North American Office building is located at the intersection of Olson Memorial Hwy (6th Ave N) and N 7th St. This intersection is critical to the design of the proposed guideway because it represents the point where the tracks must transition from at-grade running to aerial to meet the elevation of the existing Target Field Station. Connecting between the two different elevations requires separating the alignments for the inbound and outbound tracks.

The connection at Target Field Station would require an inbound track (Track 2) crossing beneath the Green Line (Existing Bridge No. 27C18) and Interchange Tail Tracks (Existing Bridge No. R0646) prior to making a 90-degree turn toward Target Field Station (see Figure A8-52). The Green Line track elevation is approximately 23 feet above existing grade at the HERC driveway on N 6th St, and the Blue Line inbound track would need to maintain a minimum of 14.5-foot clearance over N 6th St. Minimum clearance requirements between the Blue Line inbound track and the Green Line structure could not be met. The maximum LRT grade is 6 percent, which prohibits consideration of the Blue Line

inbound track elevated above the Green Line, due to the distance between Target Field Station and N 6th St. As a result, FTA and the Council have determined that this alternative could not be built as a matter of sound engineering judgment, and, therefore, it is not a feasible avoidance alternative.

Figure A8-52 N 6th St Connection to Target Field



8.7.3.5 Avoidance Alternative 5 – Grade-Separated on W Broadway Ave

Evaluation of Feasibility

While a number of social, economic, and community concerns have been identified with routing an elevated alignment on W Broadway Ave, the FTA and the Council have determined it could be built as a matter of sound of engineering judgement, and therefore, it would be feasible from an engineering perspective.

Evaluation of Prudence

i. Effectiveness in Meeting Purpose and Need

This alternative would meet the Project’s purpose and need.

ii. Safety and Operational Considerations

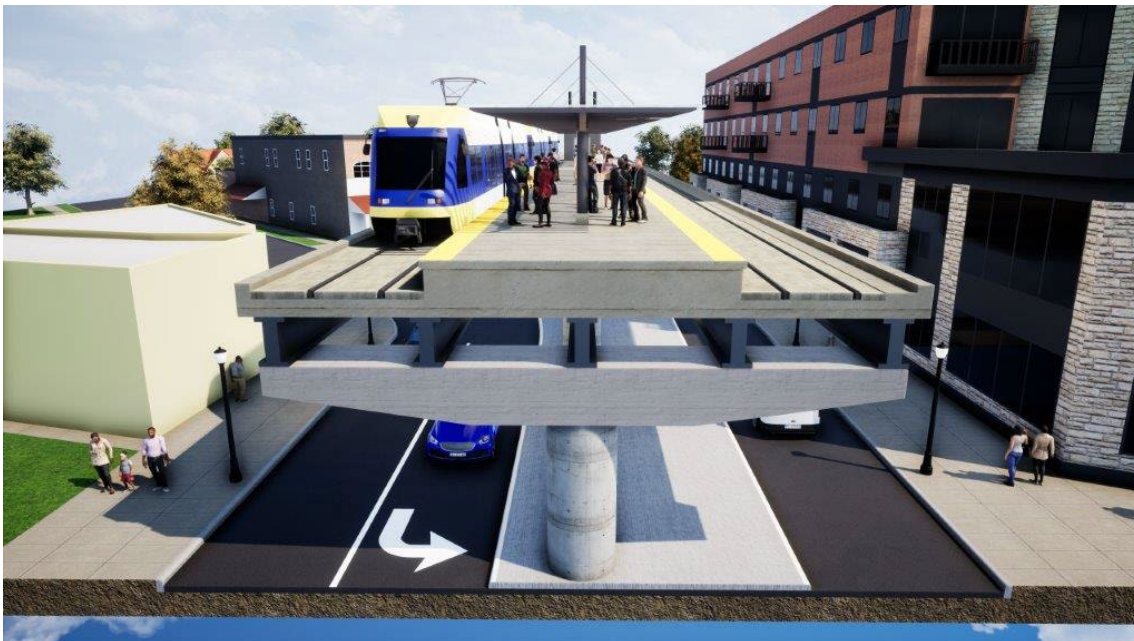
None identified.

iii. Social, Economic, Environmental, and Community Impacts

The elevated guideway and aerial stations would require an extensive series of structural columns in the roadway and result in adverse operational and construction effects on noise, vibration, traffic, parking, and visual quality (see Figure A8-53). Elevated alignments are difficult to integrate into the surrounding community, and aerial stations are not as accessible as at-grade stations. The W Broadway Ave above-grade alignment was evaluated through a public participation process and eliminated from consideration to minimize adverse effects on the W Broadway Business community during construction.



Figure A8-53 Grade-Separated on W Broadway Ave



iv. Cost

The elevated guideway would increase Project costs. Construction of an elevated alignment would be approximately three times the cost of the at-grade alignment.

v. Unique Problems or Unusual Factors

None identified.

vi. Cumulative Consideration Factors

None identified.

Avoidance Alternative Determination

This alternative would avoid use of the 1513 and 1517 Hillsdale Ave N and would be feasible but would not be prudent under the criteria defined in Section 8.7 for feasible and prudent avoidance alternatives.

8.7.3.6 Avoidance Alternative 6 – Lowry Ave

Evaluation of Feasibility

While a number of community concerns have been identified with routing the LRT on Lowry Ave, the FTA and the Council have determined it could be built as a matter of sound engineering judgement, and therefore, it would be feasible from an engineering perspective.

Evaluation of Prudence

i. Effectiveness in Meeting Purpose and Need

This alternative would not fully meet the Project’s purpose and need. The Project is needed to effectively address long-term regional transit mobility and local accessibility needs while providing efficient, travel-time-competitive transit service that supports economic development goals and objectives of local, regional, and statewide plans. Based on a review of the Project goals, this alternative would only marginally improve transit access and connection to jobs and regional destinations because it would not serve the W Broadway Business District or support the communities’ development goals.



ii. Safety and Operational Considerations

None identified.

iii. Social, Economic, Environmental, and Community Impacts

The Lowry Ave Route was evaluated through a public participation process and eliminated from consideration since it would not serve the W Broadway Business District. Community members were concerned that the low residential density along the Lowry Ave Route would not support robust LRT ridership and would not provide access to the medical, institutional, and cultural resources on W Broadway Ave. While the Lowry Ave Route may support redevelopment in the long term, it would not support the existing businesses in North Minneapolis.

iv. Cost

Not evaluated.

v. Unique Problems or Unusual Factors

None identified.

vi. Cumulative Consideration Factors

None

Avoidance Alternative Determination

This alternative may avoid use of Section 4(f) resources, but it would not be prudent under the criteria defined in Section 8.7 for feasible and prudent avoidance alternatives.

8.8 Measures to Minimize Harm

In addition to a determination that there is no feasible and prudent alternative that avoids the use of a Section 4(f) resource, FTA may not approve the use of a Section 4(f) resource unless it determines that the proposed action includes all possible planning to minimize harm to the property resulting from such use (23 USC § 138).

In evaluating the reasonableness of measures to minimize harm, FTA will consider the preservation purpose of the Section 4(f) statute and:

- The views of the OWJ over the Section 4(f) property;
- Whether the cost of the measures is a reasonable public expenditure in light of the adverse impacts of the Project on the Section 4(f) property and the benefits of the measure to the property; and
- Any impacts or benefits of the measures to communities or environmental resources outside of the Section 4(f) property.

Before approving the use of Section 4(f) property for the Project, FTA must determine that the Project includes all possible planning to minimize harm. Throughout alternatives development and the NEPA process, the Council has applied the following strategies to avoid, minimize, and mitigate effects on Section 4(f) resources:

- Using existing transportation and utility corridors as much as reasonably feasible to keep additional right-of-way needs to a minimum;
- Coordinating with OWJs to identify Section 4(f) resources to inform design decisions;
- Seeking input from stakeholders and the public regarding the effects of the Project on Section 4(f) resources; and
- Avoiding or reducing effects on Section 4(f) resources using design refinements (see Section 8.7).

FTA and the Council have consulted with SHPO and consulting parties per the terms of MOA Stipulation III to prepare a mitigation plan to resolve the adverse effects to Northwestern National Bank – North American Office and the Forest Heights Addition Historic District.



8.8.1 Northwestern National Bank – North American Office

The construction that is required to accommodate the guideway and Project elements would result in the demolition of the Northwestern National Bank – North American Office and acquisition of the property, approximately 1.0 acre (see Determination of Effects in Appendix A-4). Therefore, mitigation efforts would be the primary measures to minimize harm. During the April 23, 2025, Section 106 Consultation meeting, mitigation measures for impacts to the Northwestern National Bank – North American Office were discussed and agreed upon.

Based on the Section 106 consultation meetings, mitigation measures for impacts to the Northwestern National Bank – North American Office agreed upon by SHPO and the consulting parties will be documented in the Amended MOA. Mitigation could include interpretation and/or historic documentation of the historic property based on the results of the intensive architecture/history evaluation completed for the historic property during the identification stage of the Project, and additional research could be completed to inform the content of the interpretation and/or historic documentation. Interpretation could be incorporated into the design at a station location near the Northwestern National Bank – North American Office property.

8.8.2 Forest Heights Addition Historic District

The construction that is required to accommodate the guideway, stations, and other Project elements would result in the demolition of four contributing properties within the Forest Heights Addition Historic District (see Determination of Effects in Appendix A-4). Therefore, mitigation efforts would be the primary measures to minimize harm. During the April 23, 2025, Section 106 consultation meeting, mitigation measures for impacts to the Forest Heights Addition Historic District were discussed and agreed upon.

Based on the Section 106 consultation meetings, mitigation measures for impacts to the Forest Heights Addition Historic District agreed upon by SHPO and the consulting parties will be documented in the Amended MOA.

Mitigation could include interpretation and/or historic documentation of the historic district based on the results of the intensive architecture/history evaluation completed for the historic district during the identification stage of the Project and additional research that shall be completed to inform the content of the interpretation and/or historic documentation. Interpretation could be incorporated into the design of James Ave station.

Additionally, to minimize the adverse effect on the Forest Heights Addition Historic District, the Project will be designed in accordance with the SOI's Standard for Rehabilitation that requires "the new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment." To the extent feasible, new infrastructure will also be designed in accordance with the SOI's Standard for Rehabilitation that requires that "new additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired." This will help to minimize the adverse effects and minimize harm resulting from the use of Section 4(f) resources.

Based on the summary in this section, FTA has determined that all possible planning to minimize harm to Northwestern National Bank – North American Office and the Forest Heights Addition Historic District will be conducted and implemented through the Blue Line Extension Project's Section 106 process and with the implementation of the Project's Section 106 Amended MOA.

8.9 Section 4(f) Coordination

Section 4(f) requires coordination with OWJs over the findings and determinations described above (see 23 USC § 138). Coordination with the OWJs began during the 2016 environmental review and continued through the design modification process and the Supplemental Draft EIS. Consultation with the SHPO was initiated in 2011, and the MOA, which includes how the Project should address changes to the Project alignment, was executed in 2016 and amended in 2022. FTA has made an adverse effect finding for the Northwestern National Bank – North American



Office and the Forest Heights Addition Historic District. SHPO is currently reviewing these findings. SHPO concurrence will be included in the Amended ROD.

During the development of this Supplemental Final EIS, the Council met with TRPD, MPRB, and SHPO to develop measures to minimize harm and mitigate the Project effects on specific Section 4(f) properties. A date, description, and purpose of the meetings held to develop the Supplemental Final EIS is provided in Table A8-5.

Table A8-5 Coordination with OWJs for the Draft Section 4(f) and Section 6(f) Evaluation

Date	Meeting Type	Meeting Purpose
December 9, 2024	Design coordination	TRPD input on CLRT alignment
February 4, 2025	Design coordination	TRPD input on CLRT realignment west of CR 81 on Brunswick Ave
February 5, 2025	MPRB Board	Lowry Ave Station design
March 3, 2025	Section 106 consulting parties meeting	Review Addendum Assessment of Effects and identified properties in the APE and reviewed Assessment of Effects impacted
April 23, 2025	Section 106 consulting parties meeting	Reviewed mitigation measures

FTA will seek written concurrence from the OWJs that the Project will not adversely affect the activities, features, and attributes that qualify the property for protection under Section 4(f) and make final determinations on *de minimis* use of these resources after review of public comments on this document. Correspondence from the OWJs will be published with the Amended ROD.

DOI will receive the Supplemental Final EIS/Draft Section 4(f) Evaluation. FTA will publish comments and responses on the Draft Section 4(f) Evaluation and the final determinations in the Amended ROD.

8.10 Federally and State-Funded Parks

This section describes the two programs under which parks and recreation areas received funding that would restrict their use: the federal LWCF State and Local Assistance Program and DNR’s Outdoor Recreation Grant Program.

8.10.1 Section 6(f)(3) of the Land and Water Conservation Fund Act

Established by the LWCF Act of 1965 (Public Law 88-578), which is codified as 16 USC § 460, the LWCF State and Local Assistance Program has provided funding for parks and recreational facilities across the United States for more than 50 years. Section 6(f)(3) of the LWCF Act, commonly referred to as Section 6(f), contains provisions to protect federal investments in park and recreation resources and to ensure that the public outdoor recreation benefits achieved through the use of these funds are maintained. Section 6(f)(3) of the LWCF Act states:

No property acquired or developed with assistance under this section shall, without prior approval of the Secretary [of the Interior], be converted to other than public outdoor recreation uses. The Secretary shall approve such conversion only if he finds it to be in accord with the then existing comprehensive Statewide outdoor recreation plan and only upon such conditions as he deems necessary to assure the substitution of other recreation properties of at least equal fair market value and of reasonably equivalent usefulness and location.

In Minnesota, the LWCF Act is administered by DNR. The Director of Parks and Trails at DNR is the State Liaison Officer to the National Park Service for LWCF Act coordination.



A review of the LWCF grants database and consultation with DNR indicate that three properties were developed with LWCF grant assistance within the Project area: Oak Grove Park, Becker Park, and Graeser Park (park property). Oak Grove Park and Graeser Park (park property) would not be used by the Project (see Figure A8-6 and Figure A8-16). After the publication of the 2016 Final EIS and ROD, Becker Park received an LWCF grant in 2018 to reconstruct the park. Becker Park would require a Section 4(f) temporary occupancy exception during construction (see Figure A8-14); however, the duration of the construction activities within Becker Park is estimated to be less than 180 days to conform with the Section 6(f) LWCF temporary non-conforming use constraints. There would be no change in ownership of the Becker Park property that would be temporarily occupied. FTA and the Council would coordinate to obtain approvals for the Section 6(f) LWCF temporary non-conforming use constraints after review of public comments on this document with DNR. FTA will publish a Final Section 4(f) and Section 6(f) Evaluation with the Amended ROD.

8.10.2 Minnesota Department of Natural Resources Outdoor Recreation Grant Program

The Outdoor Recreation Grant Program administered by DNR assists local governments in acquiring park land and developing or redeveloping outdoor recreation facilities. Established in Minn. Stat. 85.019, the program provides matching grants to local units of government for up to 50 percent of the cost of acquisition, development, and/or redevelopment of local parks and recreation areas. Parks and outdoor recreation areas, natural and scenic areas, regional trails, and trail connections are all eligible for funding under this program.

The State Comprehensive Outdoor Recreation Plan, Minnesota's outdoor recreation policy plan, was developed with the input of Minnesota outdoor and natural resource leaders. It establishes outdoor recreation priorities for Minnesota to assist outdoor recreation and natural resource managers, the state legislature, and the executive branch in decision making about the state's outdoor recreation system and sets out criteria for awarding grants consistent with these identified priorities. All applications for funding under the Outdoor Recreation Grant Program are assessed to ensure that the projects are consistent with priorities established in the most recent State Comprehensive Outdoor Recreation Plan.

A review of the DNR database of Grant-Funded Parks and Natural Areas Subject to Permanent Grant Program Requirements indicated that one property that was developed through program funding is located within the Project area: Victory Memorial Pkwy (see above). The segment of the Victory Memorial Pkwy that the grant funding was used on is a minimum of 0.83 mile east of the Project. Coordination has occurred with DNR, concluding with no further need to coordinate, and is documented in Appendix A-9 in this Supplemental Final EIS.

Draft Section 4(f) and Section 6(f) Attachment A

Station Area Designs Considered

Figure 1 Penn Ave Station Shift West (26th Ave Station)

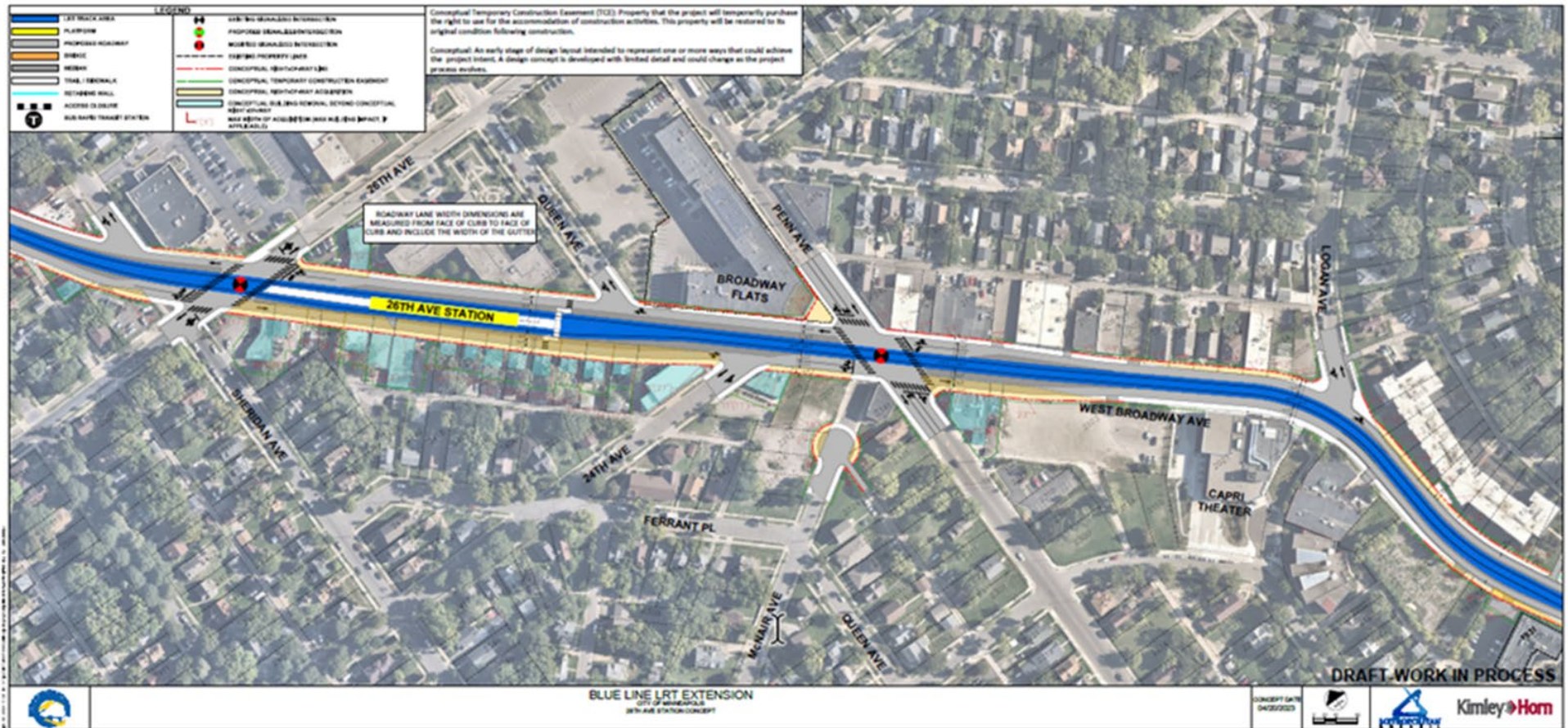


Figure 2 Penn Ave Station Shift East

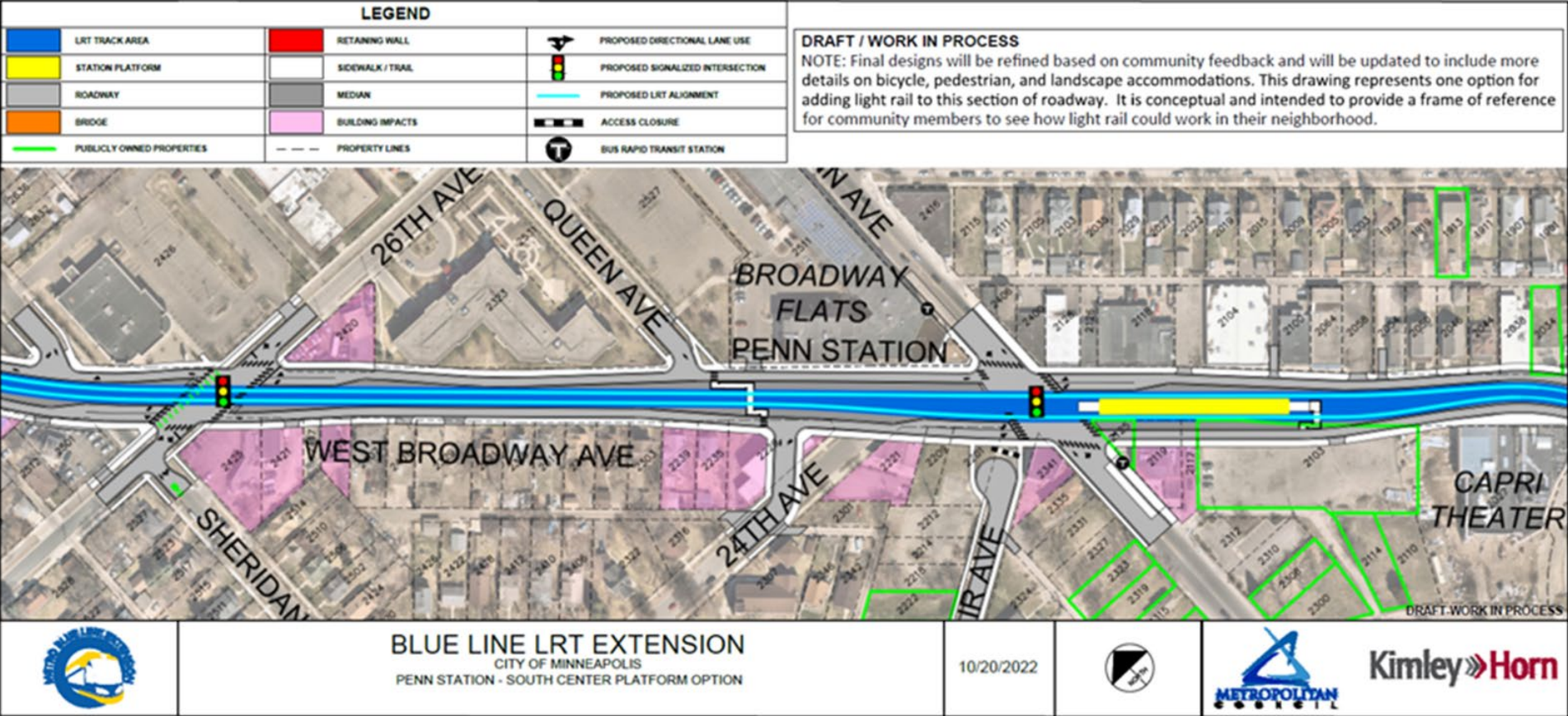


Figure 3 Elimination of James Ave Station

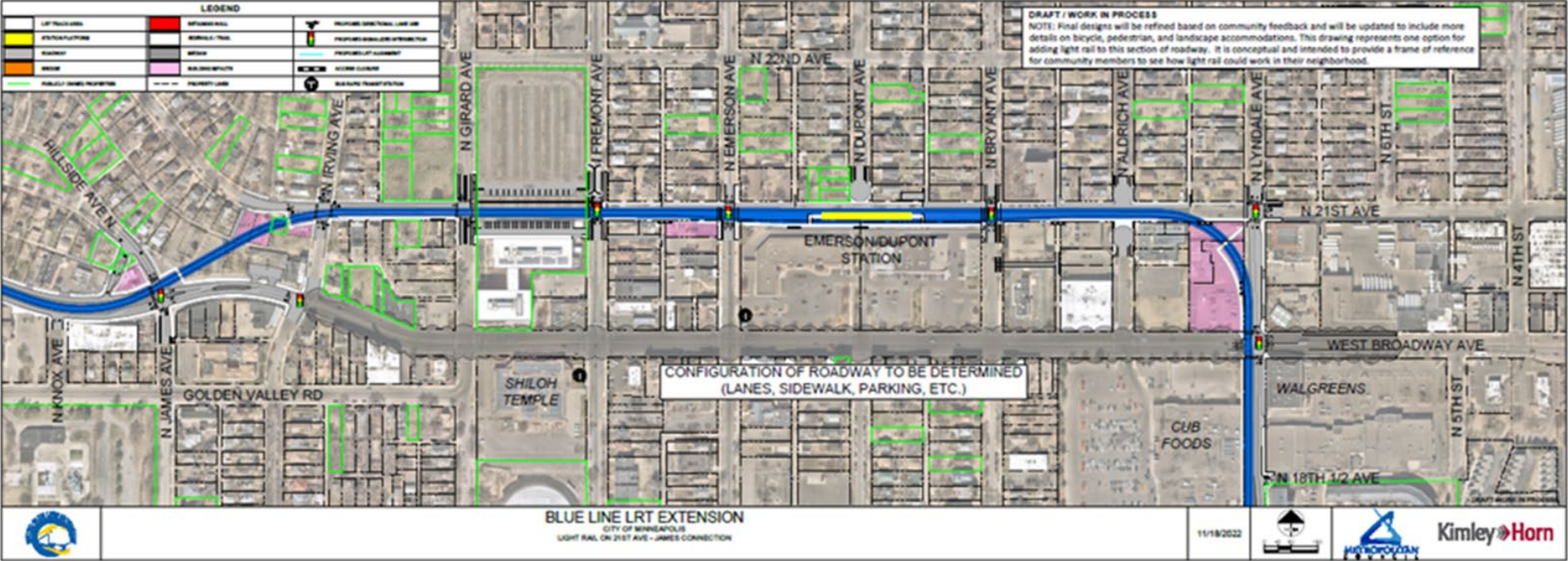


Figure 4 James Ave Connection Flattening Curve



Figure 5 W Broadway Ave Option James Ave Station Shifted East

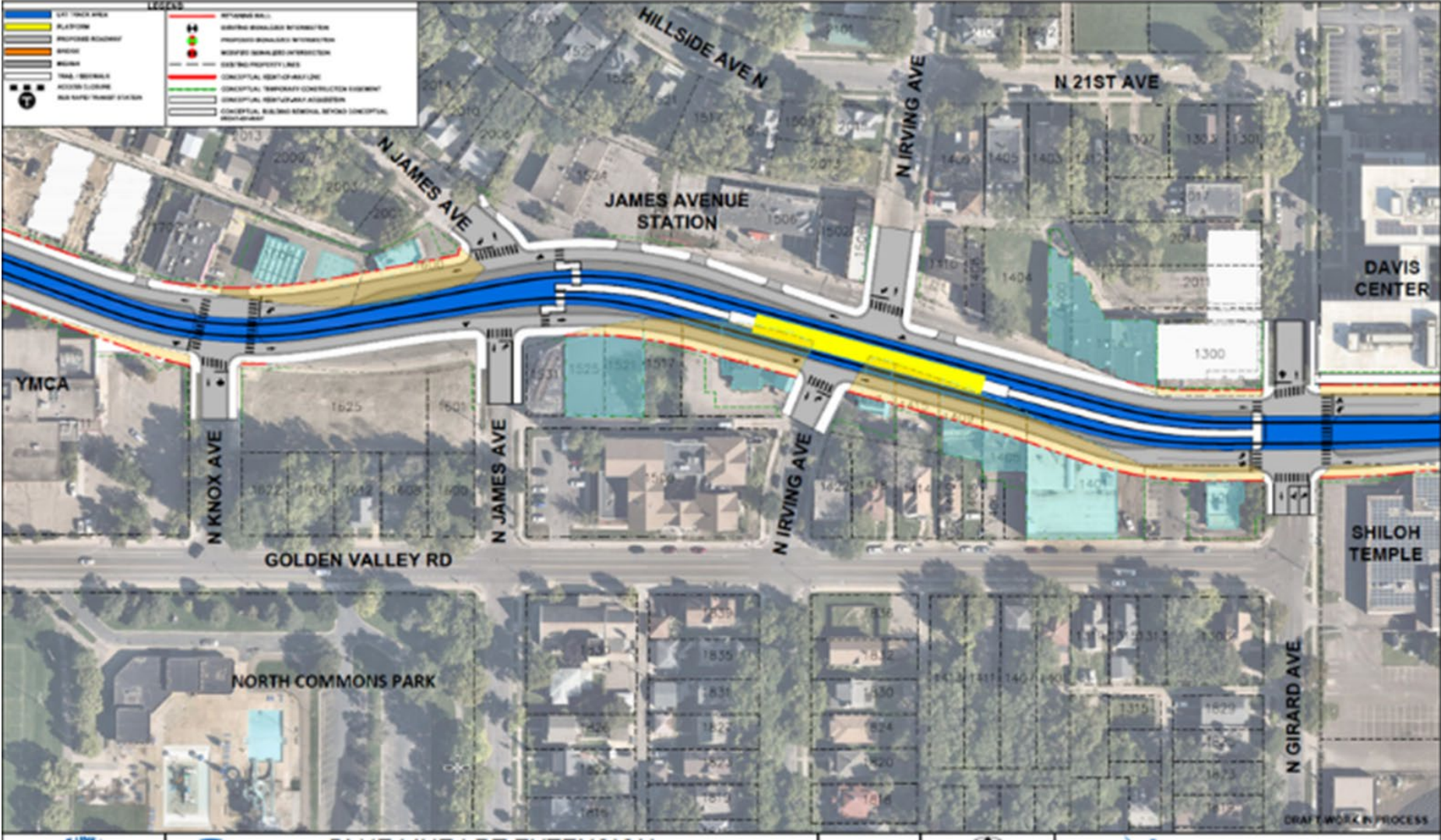


Figure 6 James Ave Station Center Platform

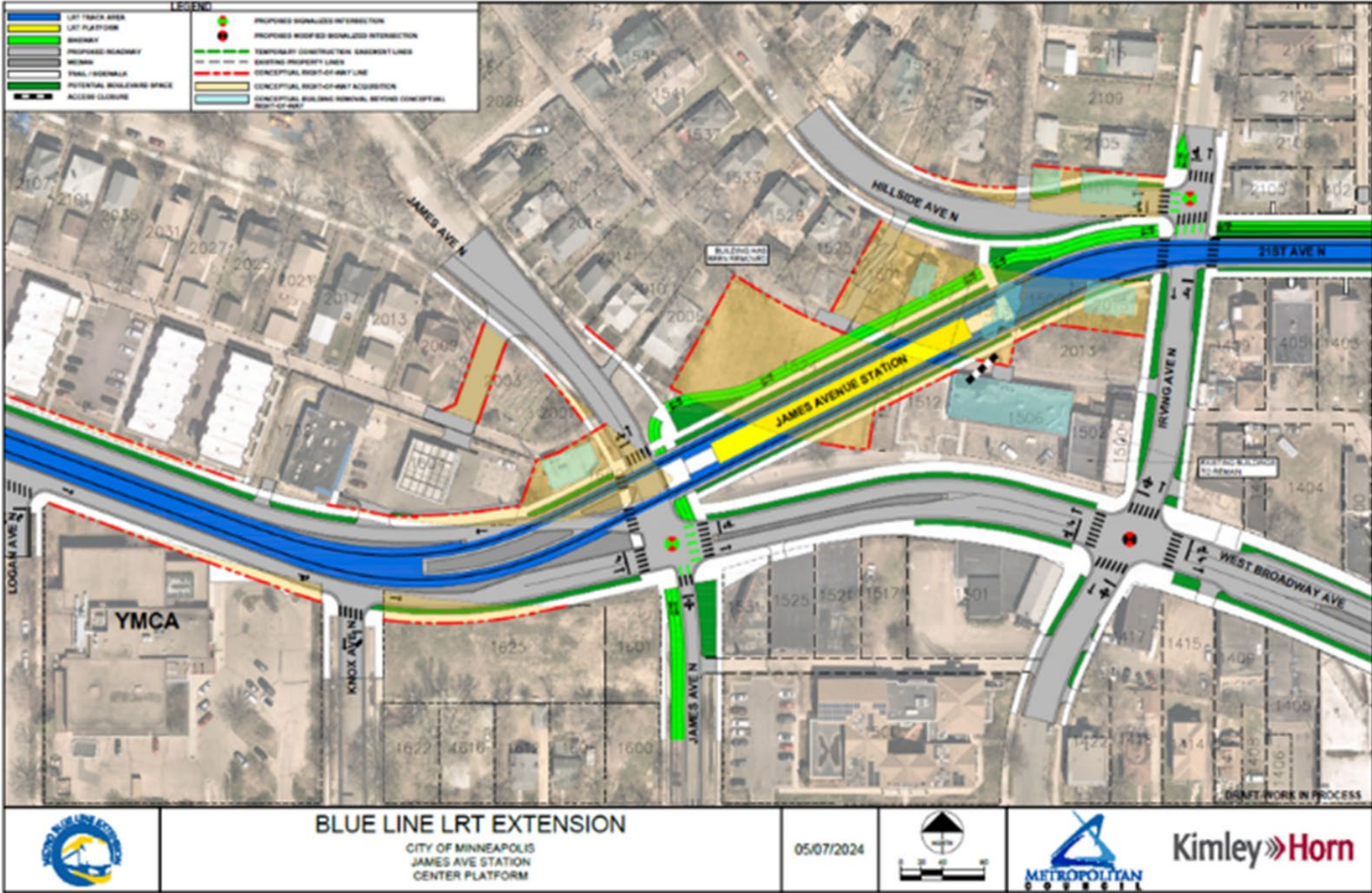
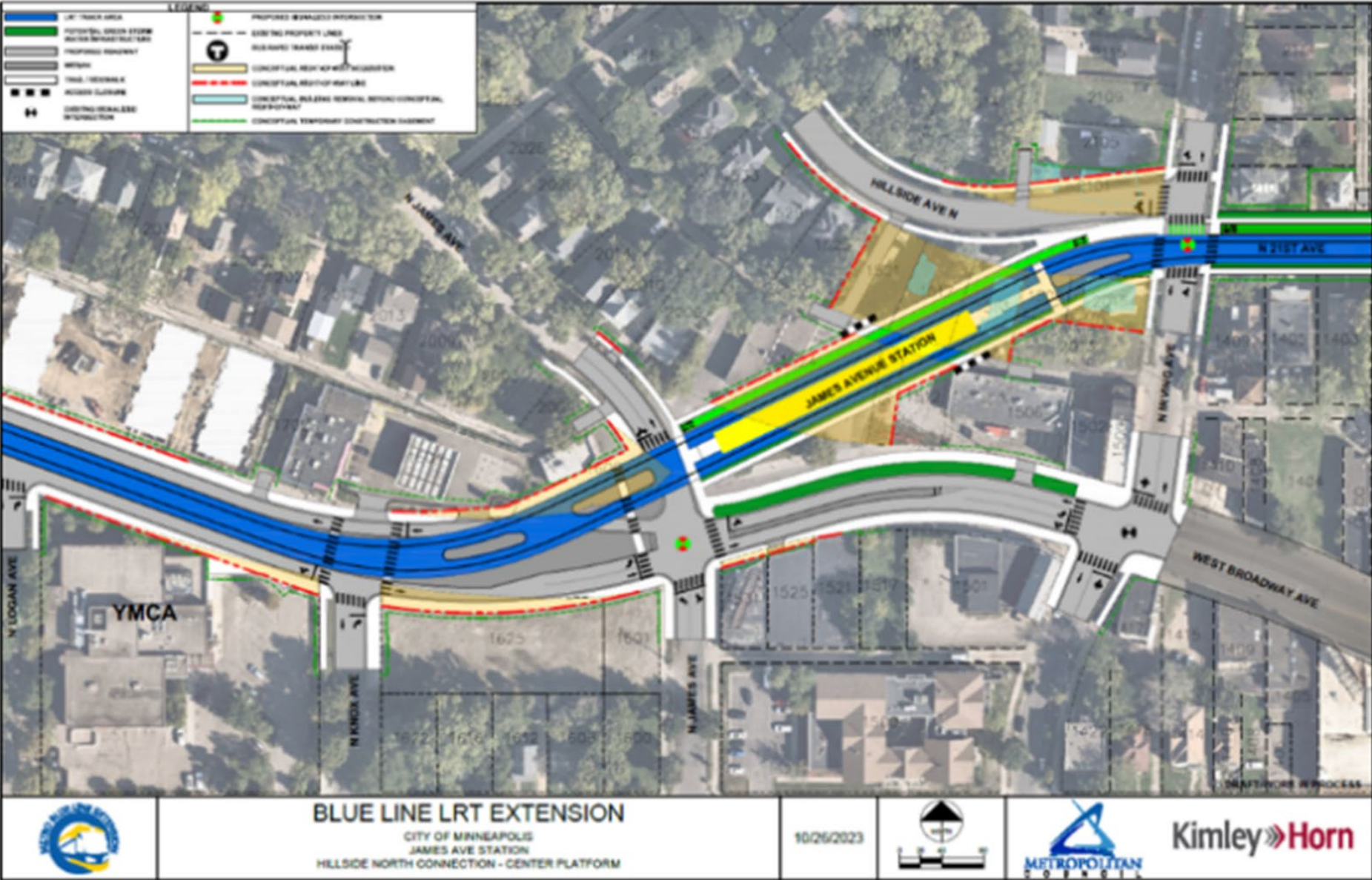


Figure 7 James Ave Station Hillside North Connection – Center Platform



¹ Federal Transit Administration, *Standard Operating Procedure No. 18, Section 4(f) Evaluations* (FTA, 2016)

<https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/SOP%2018.pdf>.

² Federal Highway Administration, “Section 4(f) Policy Paper” (FTA, 2012) <https://www.environment.fhwa.dot.gov/legislation/section4f/4fpolicy.aspx>.