

CITY OF SPRINGFIELD, OREGON

DEVELOPMENT AND PUBLIC WORKS



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July 17, 2014

Dustin Woods, Operations Engineer
Federal Highway Administration
530 Center Street, N.E., Suite 420
Salem, OR 97301

Re: Classification, Franklin Boulevard Project

Dear Mr. Woods:

This letter and the Draft CE Closeout Document are intended to serve as the basis for justification that the Franklin Boulevard Project qualifies as a Categorical Exclusion subsection (d), or CE(d), of Federal Highway Administration, DOT – 23 CFR 771 and of the National Environmental Policy Act of 1969 (NEPA). Your concurrence on this classification means that the Project may proceed to design and construction; the preparation of an Environmental Assessment or Environmental Impact Statement will not be required.

This letter contains three sections: Section 1 defines the Project Area and termini, describes the existing roadway, and describes the Project's purpose and elements. Section 2 provides the basis for determining that the Project qualifies for and may be processed as a CE(d)(1), including the applicable requirements and why the Project's impacts are not significant. Section 3 describes the public outreach conducted in the development of the Project.

1. PROJECT DESCRIPTION

Project Area and Termini

Figure 1 shows the Project Area. Figure 2 shows the Project location within the City of Springfield. As the figures show, the Project Area is located in the southwest corner of Springfield, adjacent to Eugene. Figure 3 shows the Project Corridor. The Project Corridor's western terminus is a location on Franklin Boulevard/Highway 126B at approximately M.P. 0.33 (approximately 1/4-mile east of I-5). The Project Corridor's eastern terminus is on the approaches to the Main Street and South A Street Bridges over the Willamette River, at approximately M.P. 1.2, immediately east of the intersection of Franklin Boulevard and McVay Highway. These termini are the limits of the proposed improvements to Franklin Boulevard called for by the City of Springfield's comprehensive plan.

Existing Roadway

Franklin Boulevard is a principal east-west artery connecting downtown Eugene, the University of Oregon, and downtown Springfield. Franklin Boulevard is the main arterial through the Glenwood area, which comprises the Project Area, and the area south to Interstate-5 (I-5). The EmX bus rapid transit (BRT) service, which connects downtown Eugene and downtown Springfield, travels along Franklin Boulevard. The roadway is a five-lane arterial with minimal access control, substandard and disjointed sidewalks, limited pedestrian crossings, BRT stops with shelter coverage, and no bicycle lanes or paths. Figure 4 is a typical cross-section of the existing conditions on Franklin Boulevard in the Project Area. Figure 5 shows a photo of typical conditions. The right of way varies from 70 to 75 feet in width. Bicyclists currently use the outside of the right lane or the sidewalks; there are no shoulders. Stormwater from the facility is not

treated before it is discharged to the Willamette River. The existing roadway in the Project Area is under the jurisdiction of the Oregon Department of Transportation (ODOT) and is part of the National Highway System. The City of Springfield is currently in the process of taking over jurisdiction from ODOT. It is anticipated that the jurisdictional exchange will be complete by the end of August 2014. McVay Highway will remain under ODOT jurisdiction.

Figure 1. Project Area



Figure 2. Project Location

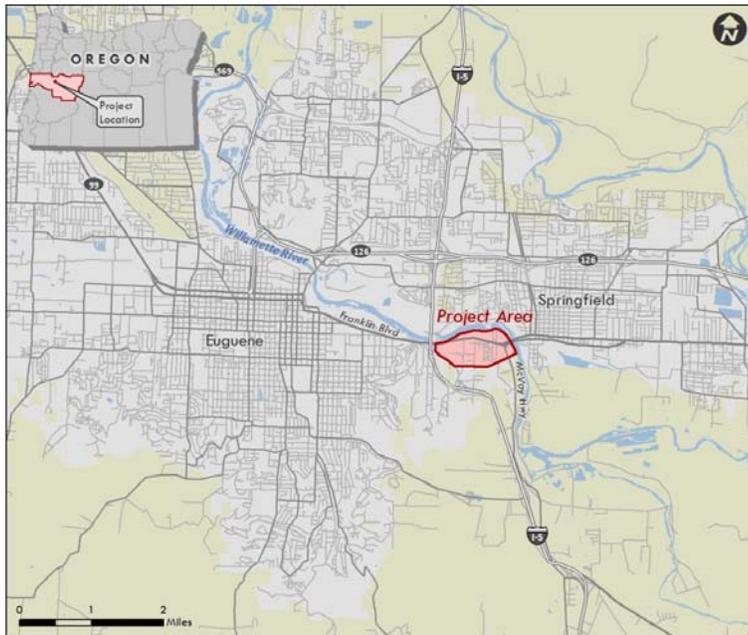


Figure 3. Project Corridor

Western Half of Project Corridor



Eastern Half of Project Corridor



Figure 4. Typical Cross-Section of Existing Conditions

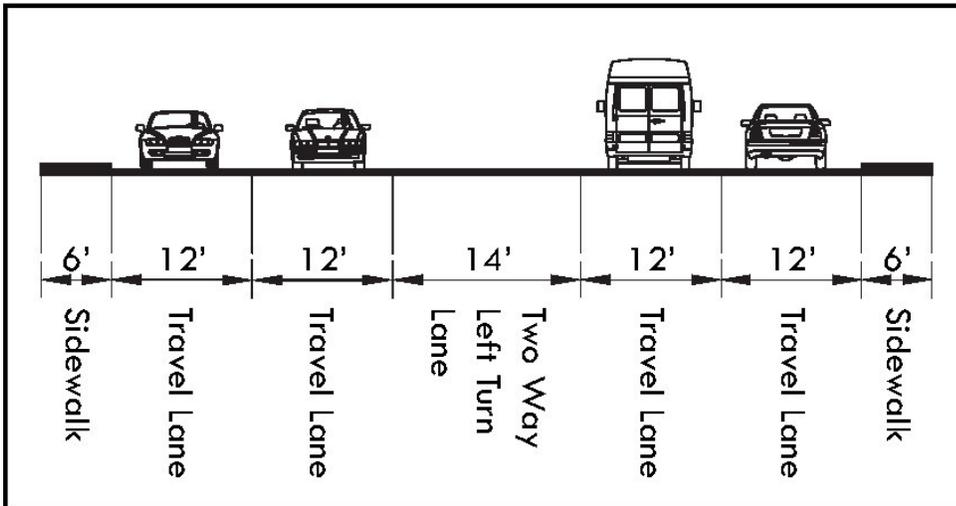


Figure 5. Existing Conditions on Franklin Boulevard



Project Purpose

The purpose of the Project is to modernize Franklin Boulevard to implement and accommodate improvements called for by the City of Springfield's comprehensive plan. The Project is expected to transform Franklin Boulevard into a modern multi-way boulevard that accommodates all urban travel modes, including cars, trucks, walking, bicycling, and transit, and improve overall roadway operations.

Project Elements

The Project proposes to reconstruct Franklin Boulevard as a modernized facility with four travel lanes, four roundabouts and associated bus turn-out lanes, bus stops, bike lanes, landscaped medians, sidewalks, and local access lanes (depending on location). Figure 6 illustrates the Project's footprint and improvements along Franklin Blvd. Figures 7 through 9 show the three cross-sections in Figure 6 at a larger scale. The West Cross-Section, Glenwood Boulevard to Henderson Avenue (Figure 7), includes two travel lanes in each direction, designated bike lanes on both sides, a central median, and sidewalks on both sides buffered from the roadway by landscaped medians. The Middle Cross-Section, Henderson Avenue to Mississippi Avenue (Figure 8), includes these same elements as well as local access roads on both sides, separated from the through traffic lanes by landscaped medians. The local access road on the south side includes one travel lane and parallel parking. The local access road on the north side includes one travel lane and angled parking. The East Cross-Section, Mississippi Avenue to McVay Highway (Figure 9), is the same as the middle cross-section, except that it does not include a local access road on the south side. The Project includes four two-lane roundabouts at the intersections of Franklin Boulevard with Glenwood Boulevard, Henderson Avenue, Mississippi Avenue, and McVay Highway.

The City of Springfield currently has a mix of federal, state, and local funds to construct an initial phase of the Project, from McVay Highway to Mississippi Avenue (the east section illustrated in Figure 9). Subsequent phases will likely be funded through a similar combination of sources.

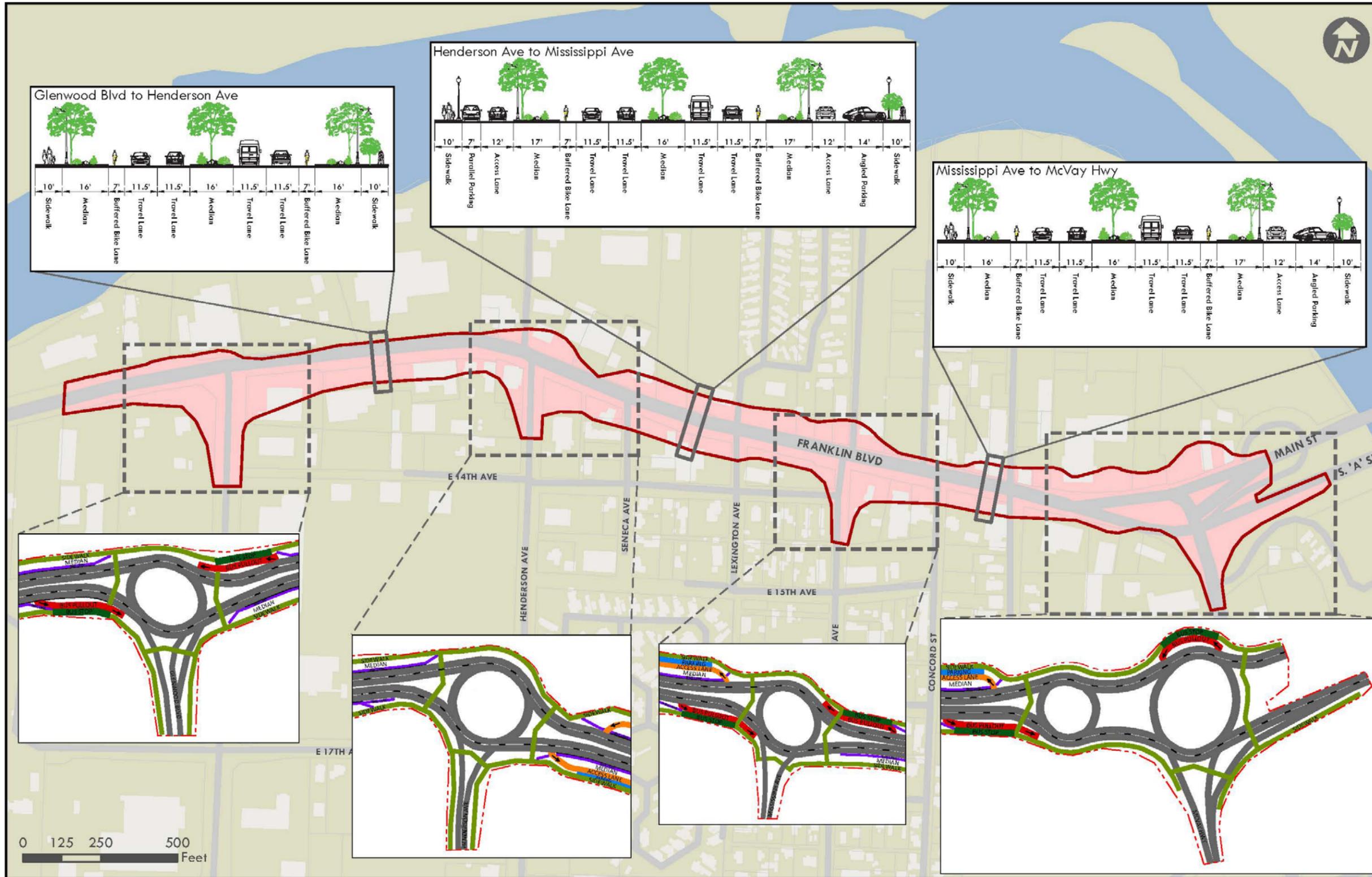


Figure 7. West Cross-Section, Glenwood Boulevard to Henderson Avenue (128 Feet Wide)

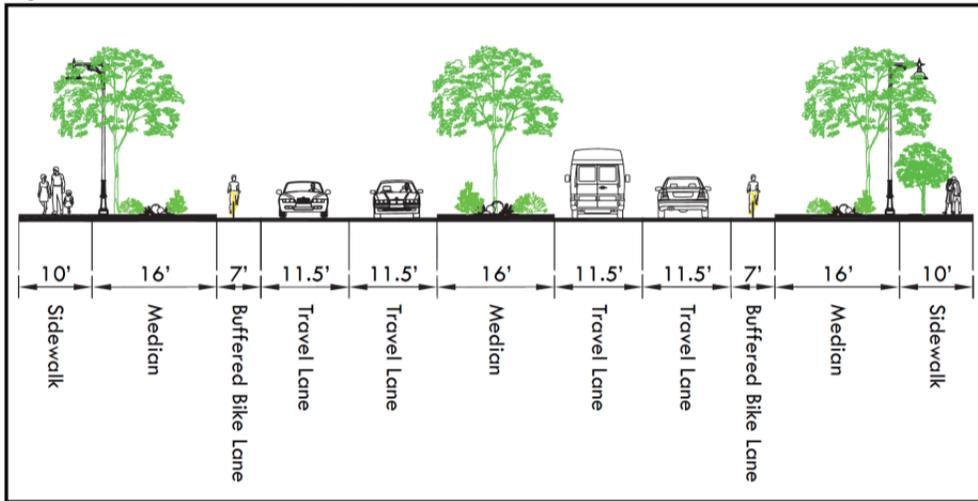


Figure 8: Middle Cross-Section, Henderson Avenue to Mississippi Avenue (175 Feet Wide)

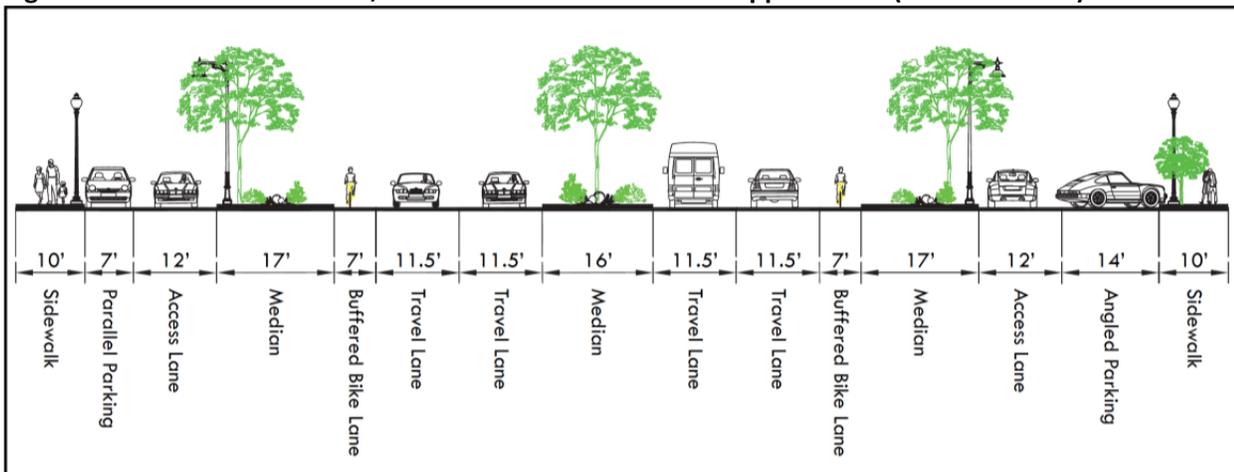
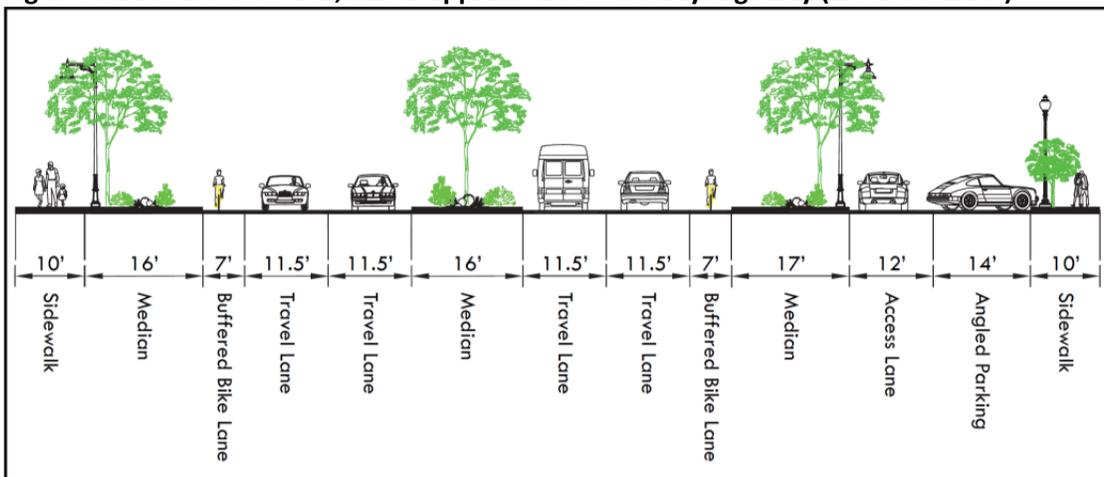


Figure 9. East Cross-Section, Mississippi Avenue to McVay Highway (155 Feet Wide)



2. BASIS FOR DETERMINATION THAT THE FRANKLIN BOULEVARD PROJECT QUALIFIES FOR A CATEGORICAL EXCLUSION

This section describes how the Project meets the FHWA requirements governing Categorical Exclusions (23 CFR 771.117, subsection (d)).

Applicable FHWA Requirements

The requirements are in Sections 771.117(a) and 771.117(d) of Title 23 of the Code of Federal Regulations. Section 771.117(a) states:

Categorical exclusions (CEs) are actions which meet the definition contained in 40 CFR 1508.4, and, based on past experience with similar actions, do not involve significant environmental impacts.

They are actions which:

- 1) do not induce significant impacts to planned growth or land use for the area;
- 2) do not require the relocation of significant numbers of people;
- 3) do not have a significant impact on any natural, cultural, recreational, historic or other resource;
- 4) do not involve significant air, noise, or water quality impacts;
- 5) do not have significant impacts on travel patterns; or
- 6) do not otherwise, either individually or cumulatively, have any significant environmental impacts.

40 CFR 1508.4, which is an administrative rule of the Council on Environmental Quality, defines a CE as “a category of actions which do not individually or cumulatively have a significant effect on the human environment” and that has been found to have no such effect by a Federal agency.¹

Section 771.117(d) allows CEs. It states:

Additional actions which meet the criteria for a CE in the CEQ regulations (40 CFR 1508.4) and paragraph (a) of this section may be designated as CEs only after the FHWA approval. The applicant shall submit documentation which demonstrates that the specific conditions or criteria for these CEs are satisfied and that significant environmental effects will not result. * * *

The Project most resembles the example actions listed in 771.117(d)(1), which reads, “Modernization of a highway by resurfacing, restoration, rehabilitation, reconstruction, adding shoulders, or adding auxiliary lanes (e.g., parking, weaving, turning, climbing).” The City of Springfield is proposing to process the action using this designation.

1) “Do Not Induce Significant Impacts to Planned Growth or Land Use for the Area”

The Project will support the growth and planned land uses in the area called for by the Eugene-Springfield General Plan, referred to as MetroPlan, which is the City of Springfield’s comprehensive plan. The Project will not constrain or otherwise induce significant impacts to planned growth or land use for the area. The

¹40 CFR 1508.4 states:

Categorical exclusion means a category of actions which do not individually or cumulatively have a significant effect on the human environment and which have been found to have no such effect in procedures adopted by a Federal agency in implementation of these regulations (§1507.3) and for which, therefore, neither an environmental assessment nor an environmental impact statement is required. An agency may decide in its procedures or otherwise, to prepare environmental assessments for the reasons stated in §1508.9 even though it is not required to do so. Any procedures under this section shall provide for extraordinary circumstances in which a normally excluded action may have a significant environmental effect.

Glenwood Refinement Plan, which is the part of MetroPlan applicable to the area, specifically calls for the modernization elements of the Project.² The City's Transportation System Plan, also part of Springfield's comprehensive plan, includes the Project and was premised on forecasts of population and employment in the area based on planned land uses called for by the comprehensive plan. This means the Project purposefully supports the land use in the City's comprehensive plan. As required by the Transportation Planning Rule, which is part of the State of Oregon's Statewide Planning Program, the City of Springfield will undertake a review and approval process for the Project, including citizen involvement, public notice, and a hearing. As part of the process, the City will adopt minor amendments to the Glenwood Refinement Plan to conform it to the Project design, as analyzed in this letter.³

2) "Do Not Require the Relocation of Significant Numbers of People"

The Project will not require the relocation of any residents. The Project will not displace any residences.

3) "Do Not Have a Significant Impact on Any Natural, Cultural, Recreational, Historic or Other Resource"

Natural Resources

The Project area is urbanized and contains no wetland, streams or waterways. There is no critical habitat for listed terrestrial species. The Willamette River supports four ESA-listed species: bull trout, Chinook salmon, steelhead trout, and Oregon chub. Stormwater runoff from the project will be infiltrated or treated prior to being released to the Willamette River; runoff is currently discharged directly to the Willamette without treatment (see the discussion of water quality under #4 "Do Not Involve Significant Air, Noise, or Water Quality Impacts," below).^{4,5} An ESA Determination of No Effect for species under the jurisdiction of the U.S. Fish & Wildlife Services has been drafted. For species under the jurisdiction of the National Marine Service (NMFS), ODOT will carry out consultation with NMFS under the ODOT-FHWA Programmatic Endangered Species Act Consultation on the Federal-Aid Highway Program. If the Project is reclassified as an environmental assessment, a biological assessment will be prepared..

Historic and Cultural Resources

There are two resources in the Project Area that are potentially eligible for listing on the National Register of Historic Places (NRHP), Bridge #1223 on Main Street spanning the Willamette River was previously determined eligible for listing on the NRHP as part of the Historic Highway Bridges of Oregon Thematic Resources grouping in 1985. Bridge #1223 is just east of the Project Corridor and will not be impacted. Project surveys and investigations found one historic resource in the Project Corridor, the Myrmo and Sons property, eligible for the NRHP. The Project is designed to avoid any direct impact on Bridge #1223 and the Myrmo & Sons property. Potential indirect impacts include the sidewalk, planter strip, and traffic modifications, which will be limited to existing right-of-way (ROW). Two Finding of Effect forms have been completed to determine potential impacts to these resources.^{6,7} No adverse effects to these two historic properties were identified.

The project is located in a highly urbanized and disturbed area. The proposed Project activities are unlikely to impact significant archaeological resources within areas already disturbed by construction along

² City of Springfield, Glenwood Refinement Plan, 2012, p. 60.

³ Memorandum to Kristi Krueger, City of Springfield, Land Use Issues in the Project Environmental Classification, Franklin Boulevard Project, March 12, 2014.

⁴ Endangered Species Act Determination of No Effect, Franklin Boulevard Project, Draft, March 11, 2014.

⁵ Memorandum to Kristi Krueger, City of Springfield, Special Status Fish and Wildlife Species and Habitats, Franklin Boulevard Project, December 18, 2013.

⁶ Cultural Resources Survey Report for the Franklin Boulevard Project, January 2014.

⁷ Section 106 Programmatic Agreement Memo, Franklin Blvd: I-5 Bridge to McVay Hwy., December 3, 2013.

Franklin Boulevard. However, an archaeological survey with shovel probing will be conducted in the open, unpaved areas located in the eastern portion of the APE adjacent to the Willamette River below and to the north and south of the aforementioned bridges, should design plans call for construction in those areas.

ODOT's internal review of the findings resulted in the following determination: the Project would have no or minimal potential to cause adverse effects to historic properties. The findings from the archaeological and historic resource investigations will be provided to the Oregon State Historic Preservation Office and applicable tribes and consultation regarding the identification and evaluation of historic properties and project effects to historic properties will be completed consistent with the National Historic Preservation Act.

Recreational Resources

The Project Area contains no parks. The Willamalane Park and Recreation District operates a seasonal miniature golf facility adjacent to Franklin Boulevard. Project right of way acquisition will not displace the facility, but will reduce the area of play by about 2,000 square feet, which is about 3 percent of the total. Under an FHWA policy paper,⁸ the facility is not subject to Section 4(f) because there is no element of public ownership. While the Willamalane Park and Recreation District is a governmental body, it holds no property interest in the facility, long-term or otherwise. It does not lease the facility from the private landowner. Instead, it operates the facility under a management agreement, a provision of which entitles the landowner to terminate the management agreement with 60 days of advance notice.

Other Resources

The project is located in a highly urbanized and disturbed area. The Project will have a positive impact on visual resources because the landscaped medians and other features will improve the appearance of the roadway. No adverse impacts on other resources have been identified.

4) "Do Not Involve Significant Air, Noise, or Water Quality Impacts"

Air Quality

The Project will not involve significant impacts to air quality and will not cause or exacerbate an exceedance of the National Ambient Air Quality Standards (NAAQSs). The Project is expected to improve air quality by replacing three traffic signals with roundabouts, which will reduce motor vehicle idling, fuel consumption, and air pollutant emissions, and by facilitating use of walking, bicycling, and transit as alternatives to private automobile travel. The Project is in an attainment area for all NAAQSs⁹ and is listed in the current conforming RTP (project 802 on p. 3-21) and TIP (project 17217 on p. 19). An indirect source permit from the Lane Regional Air Protection Agency will not be required.¹⁰ However, hot spot analyses for particulate matter 10 micrometers in diameter or smaller (PM₁₀) will be required.

Noise

Project improvements will shift through-traffic lanes closer to residences and remove some structures located along Franklin Boulevard that may provide shielding to nearby residences. Therefore a traffic noise study will be needed. If traffic noise levels are found to exceed the ODOT Noise Abatement Criteria, mitigation measures will be evaluated. Feasible and reasonable mitigation measures will be incorporated into the Project design. Construction noise from the Project could result in temporary higher noise levels from equipment operation. The project will comply with the City of Springfield's noise ordinance.

⁸ FHWA, [Section 4\(f\) Policy Paper, July 20, 2012, pp. 6 and 29.](#)

⁹ Memorandum to Kristi Krueger, City of Springfield, Air Quality, December 9, 2013.

The Willamette River does not currently meet water quality standards (the 303(d) list) for temperature, dioxin, dissolved oxygen, e-coli, iron, manganese, and mercury. Landscaped medians and roundabouts will substantially reduce impervious surface area in the Project Area. Impervious surface *within public ROW* will increase from 9 acres with the existing roadway to 15 acres with the Project. However, the Project will result in a net reduction in total impervious surface within the area by 2 acres. Measuring impervious surface both within and outside the existing ROW, while the Project will convert an estimated 2 acres of pervious surface to impervious surface, it will also convert an estimated 4 acres of impervious surface to pervious surface. This will reduce stormwater runoff. Stormwater runoff from Franklin Boulevard is now collected through a curb, gutter, inlet, and catch basin system and discharged directly to the Willamette River *without treatment*. Stormwater from virtually all of the land the Project will convert to public ROW now either infiltrates or runs off untreated. The project will either eliminate stormwater discharges from public ROW to the Willamette River through infiltration or the stormwater will be treated prior to discharge. The feasibility of complete elimination of discharges to the Willamette River will be examined during project design.

5) “Do Not Have Significant Impacts on Travel Patterns”

The Project is not expected to alter the role of Franklin Boulevard as a principal east-west route for local travel between downtown Eugene and downtown Springfield. Installation of roundabouts will not alter the traffic pattern, but will eliminate signalized intersections and facilitate traffic flow. The Project will be designed to achieve an LOS of C or better in the design year, capacity will be adequate to accommodate existing traffic volumes and traffic volumes from planned future population and employment growth. Improvements to pedestrian, bicycle, and transit facilities are expected to increase travel by these modes.

6) “Do Not Otherwise, Either Individually or Cumulatively, Have Any Significant Environmental Impacts”

Right of Way

The Project will acquire approximately 7 acres, consisting of all or portions of 56 parcels owned by 31 separate property owners. The 7 acres represents 14 percent of the 50-acre total size of all the affected parcels and 11 percent of the 63-acre total area of all parcels that front on Franklin Boulevard in the project limits. Easements, if needed, will be determined in the design process.

Business Relocations and Displacements

The Project will relocate or displace 19 businesses.

- All businesses relocated by the Project will be eligible for financial relocation assistance required by the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Uniform Act).
- For all businesses relocated by the Project, the City of Springfield will comply with Section 1200 of the Glenwood Urban Renewal Plan, which states:

The [Springfield Urban Renewal] Agency will provide relocation assistance to all persons or businesses displaced temporarily or permanently by project activities. Those displaced will be given assistance in finding replacement facilities. All persons or businesses which may be displaced will be contacted to determine such relocation needs. They will be provided information on available housing or space and will be given assistance in moving. All relocation activities will be undertaken and payments made in accordance with the requirements of ORS 281.045-281.105 and any other applicable laws or regulations.

Relocation payments will be made as provided in ORS 281.060. . . Payment for moving expenses will be made to residents and businesses displaced. Additional assistance the City of Springfield will provide to relocating businesses includes:

- help with finding locations for new buildings or business operations in Springfield or surrounding communities, including on land or in buildings currently owned by the City;
 - assistance in negotiations to purchase property;
 - financial assistance with system development charges;
 - help with providing needed infrastructure to enable use of a property;
 - assistance with property appraisals;
 - financial assistance for environmental clean-up of new sites using EPA Brownfields Assessment Grants for Level 1 and 2 property assessments;
 - acting as ombudsman for development projects;
 - help in navigating local development processes and solving development issues; and
 - help to obtain grants, loans, and other local, state, and federal assistance, including a wide range of available loan programs for local businesses through Cascades West Financial Services, the Neighborhood Economic Development Corporation, and local banks.
-
- The relocation of the displaced businesses will have a limited effect on the customer bases of the businesses because of the market areas and types of businesses displaced. Based on survey results (See Appendix A) for the displaced businesses, all have market areas that are the metropolitan area, the state, or the region (Oregon, Washington, California, and Idaho). Because customers are located throughout the metropolitan area or beyond, this reduces the importance of the business's location within the project area. A related characteristic of the businesses is that, with the exception of the Buy-2 convenience store, the businesses are either in the category of destination retail sales and service (e.g., auto sales or service) or customers do not visit the location to conduct business (e.g., contractors). The effects on business patronage will depend on the business, where it is relocated, and how much it relies on signage, and reliance on drive-by traffic exposure versus other types of advertising.
 - The metropolitan area has an ample supply of available real estate to which displaced businesses could relocate. For the five categories of space occupied by one or more of the 19 displaced businesses, Table 1 lists the number of displaced businesses that use the space type and the number of properties available in that category as listed with a real estate broker for lease or sale as of May 21, 2014. For the general retail, light industrial, and auto repair/restoration/services categories, the number of listings substantially exceeds the number of displaced businesses in that category. The number of listings for properties suitable for auto sales is the same as the number of displaced auto sales businesses. However, in 2015, the City of Springfield and Lane County are expected to adopt amendments to their comprehensive plans and zoning codes to revise allowed uses along a 6-mile segment of Springfield's Main Street to encourage redevelopment. Allowed uses will include auto sales, as well as auto repair. This will increase the number of properties available for relocation. The landscaping supply business no longer occupies the property where it was located at the time of the business survey. The property is now rented to a similar business that has other locations in the metropolitan area.

Table 1. Commercial Property in Metropolitan Area Available for Lease or Sale

Category of Space Occupied by Displaced Business	Number of Displaced Businesses	Available Commercial Property		
		For Lease	For Sale	Total
General Retail	7	51	6	57
Light Industrial	4	34	8	42
Auto Sales	4	2	2	4
Auto Repair, Restoration, and Services	3	7	3	10
Landscaping Supplies	1	2	0	2

Notes: Properties included were available on May 21, 2014.

Source: LoopNet Premium Searcher, <http://www.loopnet.com>.

- Approximately 90% of the businesses that will be relocated or displaced rent their space from a property owner and therefore are susceptible to relocation or displacement for reasons independent of the Project. The City of Springfield has made multiple revisions to the design of the Project to minimize business displacement. This has reduced the number of relocations or displacements by one-third. Table 2 compares the number of businesses the Project will relocate or displace to the number under two conceptual designs the City previously considered.

Table 2. Potential Relocations or Displacements under Each Conceptual Design

Business/Residence Name	Business/Residence Address	Previously Considered Designs		The Project
		Initial Conceptual Design	Workshop Conceptual Design (2013)	Revised Conceptual Design (2014)
Central Valley Cycle	3690 FRANKLIN BLVD		X	
Ace Trading Co.	3697 FRANKLIN BLVD	X	X	X
Automatic Heat/ Eugene Heating, Inc.	3675 FRANKLIN BLVD	X	X	X
C&M Pump	3619 FRANKLIN BLVD	X	X	X
National Photocopy Corp.	3619 FRANKLIN BLVD	X	X	X
Glenwood Appliance	3629 FRANKLIN BLVD	X	X	X
At Your Service	3629 FRANKLIN BLVD	X	X	X
t3 Tech Solutions	3655 FRANKLIN BLVD	X	X	X
Scothorn Auto Repair	3520 FRANKLIN BLVD		X	
Northwest Auto Group	3540 FRANKLIN BLVD		X	
StoveTec	3400 FRANKLIN BLVD		X	
Oregon Converter Co.	3440 FRANKLIN BLVD	X	X	
Knez Building Materials	3440 FRANKLIN BLVD	X	X	
Summers Car Co./ Summers Investments Inc.	3523 FRANKLIN BLVD	X	X	X
R&S Outdoor Supply	3409 FRANKLIN BLVD	X	X	X
Ramsey-Waite Co.	4258 FRANKLIN BLVD	X		
Westside Classic Buicks	4190 FRANKLIN BLVD	X	X	X
Camp Putt Adventure Golf Park	4006 FRANKLIN BLVD	X	X	
Action Surplus	4000 FRANKLIN BLVD		X	X
Signature Surfaces NW (Nugent Enterprises LLC)	3976 FRANKLIN BLVD		X	
Glenwood Flea Market	3758 FRANKLIN BLVD		X	
Buy 2	4105 FRANKLIN BLVD	X	X	X
Thabet Management Operations	4105 FRANKLIN BLVD	X	X	
A-American	4075 FRANKLIN BLVD	X	X	X
Castle Rock Auto LLC	1415 MISSISSIPPI AVE	X	X	X
Washington Auto Services Inc.	3955 FRANKLIN BLVD	X	X	X
Goofy's Mufflers	3855 FRANKLIN BLVD	X	X	X
Monroe Motors	3815 FRANKLIN BLVD	X	X	X
Eugene Springfield Lock and Safe Co.	3799 FRANKLIN BLVD	X	X	X
Residences (5 apartments)	3787 FRANKLIN BLVD	X		
Big B Tires (Franklin Blvd Location)	3709 FRANKLIN BLVD	X	X	X
U-Haul/ Six Sac Self Storage	4400 FRANKLIN BLVD	X		
DariMart	4215 FRANKLIN BLVD	X	X	
Cash King	4430 FRANKLIN BLVD	X		
Big B Tires (McVay Hwy Location)	4432 FRANKLIN BLVD	X		
Displacements				
<i>Businesses</i>		27	30	19
<i>Residences</i>		5	0	0

X = Would be relocated or displaced under this conceptual design.

Socioeconomic Impacts

The Project's impact on jobs will be limited. The 106 jobs held by employees of the 19 relocated or displaced businesses are 9 percent of all jobs in the Project Area, and most jobs will move to the businesses' new locations within the region.

The relocation or displacement of businesses by the Project would not deprive the neighborhood of important local services. The Project design avoids displacing the DariMart on Franklin Boulevard at Brooklyn Street, which is a convenience store that also sells produce and other groceries. It is important to the neighborhood as the nearest full-service grocery stores are 2 miles from the center of the neighborhood.¹¹ Also, the DariMart has been identified as a community gathering place. Of the 19 businesses the Project will relocate or displace, only one, Buy-2, another convenience store located near the DariMart. This store is not recognized as a community gathering area.

The Project will reduce the impediment to pedestrian and bicycle movement across Franklin Boulevard that the existing roadway creates because of its substandard sidewalks and limited pedestrian crossings. The Project will introduce wide sidewalks separated from through traffic, improved spacing for pedestrian crossings, pedestrian refuges, and slowed traffic.

The improved sidewalks and crosswalks provided by the Project will improve conditions for all pedestrians as well as for the elderly and disabled, higher percentages of whom live in the neighborhood than elsewhere in Springfield and the region. Block Group (BG) 1 of Census Tract (CT) 36 is the U.S. Census Bureau enumeration area most representative of the Project Area. See Figure 10. It has a higher percentage of elderly residents (22 percent) than the City of Springfield and Lane County (12 and 15 percent, respectively).¹² The Project Area includes the 89-space Midway Mobile Manor mobile home park, where residents must be 55 or older. Given the somewhat higher percentage of the elderly in CT 36 BG 1 and Midway Mobile Manor, there may be a comparatively higher percentage of the disabled in the Project Area, but a statistically reliable percentage for CT 36 BG 1 is not available.

Access to businesses will be provided during construction.

Environmental Justice

There is not a readily identifiable group or cluster of minority or low-income persons in the Project Area. The U.S. Census Bureau's 2010 Decennial Census shows that minorities represent a relatively small portion of the population in Lane County, the Eugene-Springfield Metro Area, the City of Springfield, and CT 36 BG 1 (shown in Figure 10). Minorities represent approximately 16.4 percent of the total population in BG 1, which is slightly lower than the minority population of the City of Springfield (19.5 percent), but similar to Lane County as a whole (15.3 percent).¹³ City officials familiar with the Project Area report that it contains no known cluster or dispersed populations of minorities. Additionally, no residents will be displaced by the project.

The Project will likely impact low-income populations by moving the road closer to their residences. However, the impacts will not be disproportionately high and adverse. CT 36 BG 1 has a substantially higher low-income population (27 percent) than the City of Springfield, and Lane County (21 and 19 percent, respectively).¹⁴ The Project Area is thought to have a low-income population of 150 to 300

¹¹ The distances are from 17th Street and Mississippi Avenue to the Market of Choice on Franklin Boulevard in Eugene and the Safeway at Q Street and Pioneer Parkway in Springfield.

¹² Memorandum to Kristi Krueger, City of Springfield, Socioeconomics, February 12, 2014.

¹³ Memorandum to Kristi Krueger, City of Springfield, Environmental Justice, February 12, 2014.

¹⁴ Ibid.

persons.¹⁵ As many as 20 members of this population may live within the Project Corridor. Based on the type, size, and condition of the dwelling units located adjacent to Franklin Boulevard in the Project Corridor, some or all of the estimated 20 occupants may be low-income. As shown in Figure 11, these dwelling units are: five apartment units in a building located directly west of Seneca Avenue, one mobile home in the Ponderosa Mobile Village mobile home park, and four apartment units and a duplex located near the approach to the A Street Bridge on the east end of the Project Corridor. The Project will not relocate or displace any residents, but may increase noise levels at these residences. A traffic noise study will be conducted to analyze potential noise impacts and evaluate mitigation measures. Any feasible and reasonable mitigation measures will be incorporated into the Project design.

As pointed out in the discussion of employment impacts, the Project's conceptual design was modified to avoid displacing the DariMart, which serves low-income residents, as well as other residents. The only business the Project will displace that primarily serves the local area is Buy2, a convenience store located adjacent to the DariMart; the DariMart can meet convenience needs now met by the displaced business.

In addition, the occupants of these residences and all low-income residents in the Project Area will share in the benefits of the Project, including improved sidewalks, pedestrian crossings, and bus stop access, as well as improved motor vehicle access and safety.¹⁶ The adverse effects of the Project will not be predominantly borne by the low-income population and the adverse effects on the low-income population will not be appreciably more severe or greater in magnitude than the impact on the non-low-income population.

The City of Springfield commits to taking measures to encourage low-income residents of the Project Area to participate in project development. These will include visits by Project staff to the residents of the 12 dwelling units referenced above and one or more gatherings in the neighborhood, with food and entertainment provided; publicized by leaflets delivered door-to-door. Project staff will take notes and otherwise document the views of residents about the Project and proposed mitigation. Project staff will also document the degree to which low-income populations were involved in the decision-making process related to project development, impact analysis and mitigation.

¹⁵ According to the U.S. Census Bureau American Community Survey 2008-2012 5-Year Estimates, 2012, all of CT 36 BG 1 is estimated to have 272 low-income persons living in it, but the margin of error is 122. Most residents of CT 36 BG 1 live within the Project Area.

¹⁶ FHWA, Memorandum, Guidance on Environmental Justice and NEPA. December 16, 2011, http://environment.fhwa.dot.gov/projdev/guidance_ej_nepa.asp

Figure 10. Project Area Census Tract and Block Groups

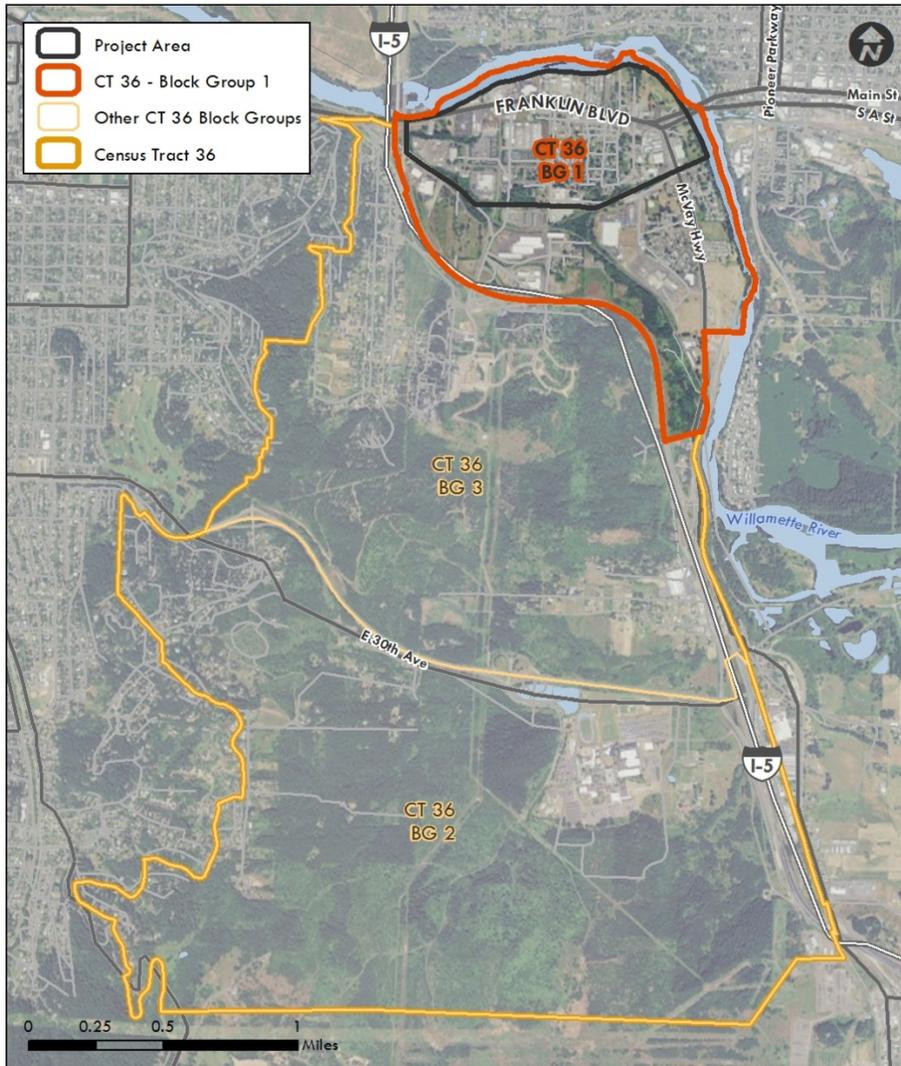
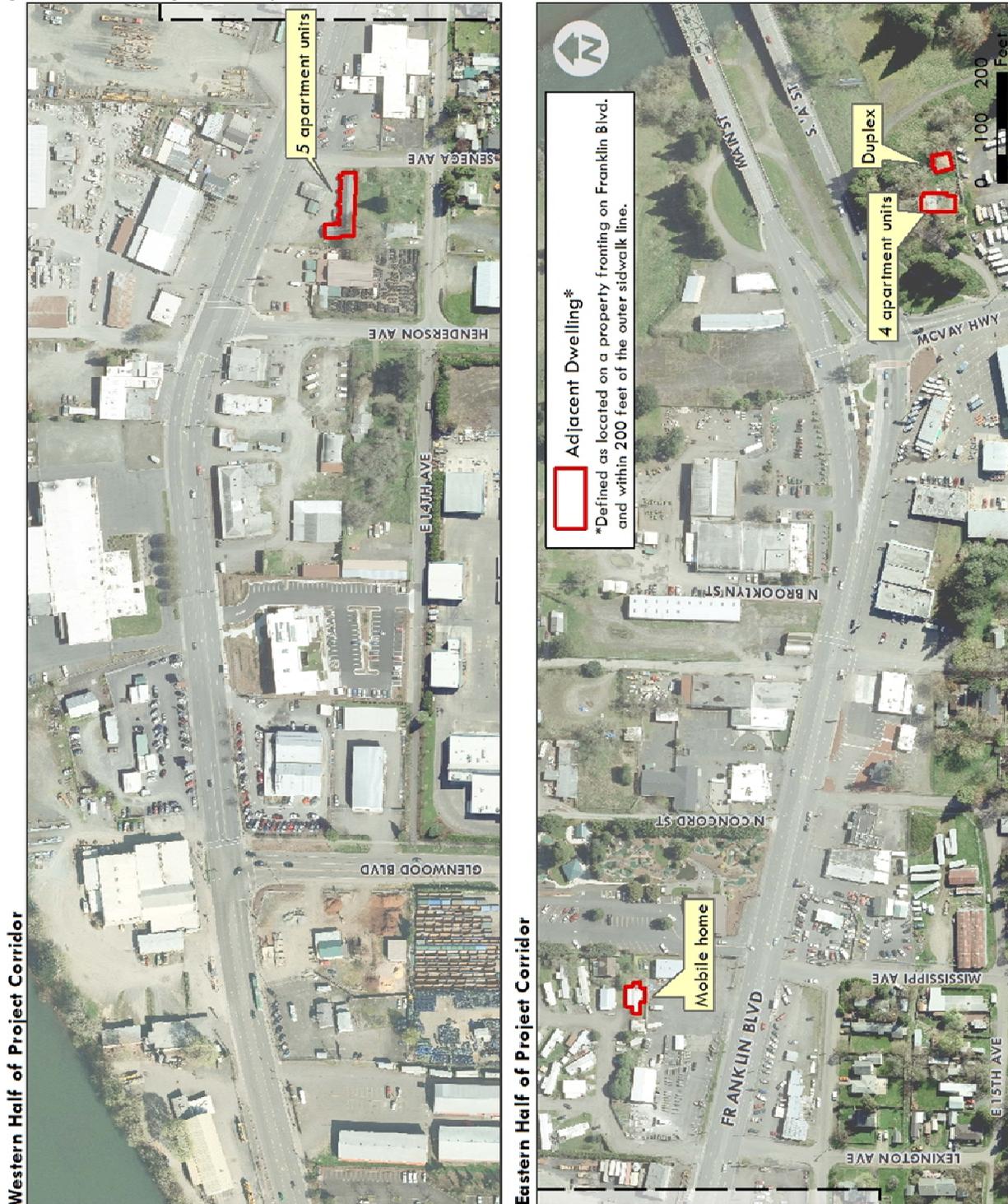


Figure 11. Dwelling Units Adjacent to Franklin Boulevard



3. Public Outreach Efforts

Public outreach has been ongoing throughout the development of the Franklin Boulevard design and the Glenwood Refinement Plan. The Initial Conceptual Design for Franklin Boulevard was developed beginning in 2007 during the Franklin Boulevard Study.¹⁷ A 15-member stakeholder advisory committee (SAC) met 8 times in late 2007 and early 2008. A three-day design workshop was held in August 2007 and included two SAC meetings and a public open house. Several alternative alignments and designs were evaluated. The SAC made a final recommendation during the winter of 2008 and a second public open house was held to review the SAC's recommendation. On March 17, 2008, the Springfield City Council endorsed the Initial Conceptual Design and had it integrated it into the Glenwood Refinement Plan.

The Glenwood Refinement Plan update began in 2009. A Citizen Advisory Committee (CAC) was formed in early 2009 to be an active participant in the development of a vision for the Glenwood area.

In addition, the CAC was advised by a Technical Advisory Committee (TAC) made up of representatives from the City of Springfield and other public agencies that provide public facilities or services in Glenwood.

Other public involvement activities performed during the Glenwood Refinement Plan process included the following:

- an initial direct mailing to all property owners and residents in regular updates to members of an interested parties list;
- a project website;
- a public open house;
- ongoing articles have been published in the Register-Guard newspaper covering the Glenwood Refinement Plan and Franklin Blvd. improvements;
- outreach to specific interest groups, such as the Intergovernmental Housing Policy Board, Springfield Chamber of Commerce Economic Development Committee, and Willamalane Park and Recreation District Board; and
- public work sessions and hearings with the Springfield and Lane County Planning Commissions, Springfield City Council, and Lane County Board of Commissioners.

The Glenwood Refinement Plan update, incorporating the Franklin Initial Conceptual Design, was adopted in 2012.

In late 2013, the City of Springfield conducted door-to-door interviews with all employers in the Project Area, including the businesses along Franklin Boulevard, to obtain information about the business and employment makeup of the corridor and to keep local businesses informed about the current status of the Project. All but two employers cooperated with the survey. Appendix A contains a compilation of the survey results for the displaced businesses, all of which responded to the survey.

In early 2014, the City launched a new Franklin Blvd. project website and performed follow up door-to-door interviews with businesses along Franklin Boulevard to present the latest conceptual design, as presented in this document. The current conceptual design has also been presented at City Council meetings and there have been additional articles in the Register-Guard newspaper.

A public involvement plan has been developed that will guide additional outreach efforts for this phase of the Project beginning in spring 2014, including outreach specifically to low-income, elderly, and disabled populations. The public involvement plan will focus on ongoing, direct communication with Glenwood residents, businesses, and property owners. Public outreach will involve a wide range of efforts, including

¹⁷ <http://www.ci.springfield.or.us/tigergrant/FranklinProjectReport.pdf>

direct mailings, e-mail updates to the Interested Parties list, local media announcements, a Project website, Project posters located at high visibility locations in the Project Area, open houses, updates to the Glenwood Redevelopment Advisory Committee, and in-person meetings with affected property and business owners.

Public involvement efforts will include the following outreach activities specifically targeted at the Glenwood community:

- direct mailings to all business and property owners in the corridor to inform about progress and opportunities;
- individual meetings between the Project team and any businesses directly impacted by the Project to discuss options, clearly outlined process for settlement, leave descriptive materials for consideration, and give contact information for ongoing conversation; and
- open invitations to directly affected community members who wish to receive additional information via an e-update, phone calls, the Project website, and the local media.

In addition, the public involvement plan will include direct outreach to low-income, elderly, and disabled populations in the Project Area through alternative means. Targeted outreach efforts to these groups will include the following activities:

- visits by Project staff to the residents of the 12 dwelling units referenced above in the discussion of Environmental Justice impacts;
- one or more gatherings in the neighborhood, with food and entertainment provided, publicized by leaflets delivered door-to-door;
- co-hosted “coffee & conversation” sessions at Glenwood neighborhood homes;
- Project updates at meetings of the Glenwood Water District Board;
- direct phone calls;
- placement of Project information in the Glenwood Gazette;
- information sharing through Ride Source, LCOG’s Senior & Disabled Services, Meals on Wheels, and area caregivers;
- use of leaflets or mailings for critical information; and
- a dedicated phone line with recorded information message, if feasible.

Very truly yours,

Kristi Krueger, Principal Civil Engineer
City of Springfield Community Development Division,
Development and Public Works Department

APPENDIX A
RESULTS COMPILATION
2013 EMPLOYER SURVEY