AECOM DIN 01770

TITLE VI EQUITY ANALYSIS
RAIL OPERATIONS AND MAINTENANCE FACILITY

Durham-Orange Light Rail Transit Project

GO Triangle

November 2015

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List of Acronyms and Abbreviations

Acronym/Abbreviation	Definition
C.F.R.	Code of Federal Regulations
CHT	Chapel Hill Transit
DEIS	Draft Environmental Impact Statement
DHA	Durham Housing Authority
D-O	Durham-Orange
D-O LRT	Durham-Orange Light Rail Transit
EJ	Environmental Justice
FTA	Federal Transit Administration
I-40	Interstate 40
LEP	Limited English Proficiency
LRT	Light rail transit
LRV	Light rail vehicle
NAACP	National Association for the Advancement of Colored People
NC	North Carolina
NCCU	North Carolina Central University
NCRR	North Carolina Railroad
NEPA	National Environmental Policy Act of 1969
NHC	New Hope Creek
PAC	Partners Against Crime
ROMF	Rail operations and maintenance facility
Title VI	Title VI of the Civil Rights Act of 1964
Triangle Transit	Research Triangle Regional Public Transportation Authority d/b/a Triangle Transit d/b/a Go Triangle
UNC	University of North Carolina
US	United States
U.S.C.	United States Code
VA	Veteran Affairs

1. Purpose and Summary

The Research Triangle Regional Public Transportation Authority d/b/a Triangle Transit d/b/a GoTriangle (Triangle Transit), in cooperation with the Federal Transit Administration (FTA), is preparing a Draft Environmental Impact Statement (DEIS) pursuant to the National Environmental Policy Act (NEPA) to evaluate the proposed Durham-Orange Light Rail Transit (D-O LRT) Project, a high-capacity transit improvement in the Research Triangle region within the Durham-Orange (D-O) Corridor between Chapel Hill and Durham.

As part of this project, a Rail Operations and Maintenance Facility (ROMF) would be constructed to perform maintenance functions associated with the operation of the light rail system. The selection of a location to construct the ROMF is required.

Title VI of the Civil Rights Act of 1964 (Title VI) provides that "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." See 42 U.S.C. § 2000d

This Title VI analysis was conducted pursuant to FTA Circular 4702.1B, Title VI Requirements and Guidelines for Federal Transit Administration Recipients (2012), which requires an equity analysis to ensure that the location of a maintenance, storage, or operation facility is selected without regard to race, color, or national origin.

Title 49 of the Code of Federal Regulations (C.F.R.) Section 21.9(b)(3) states, "In determining the site or location of facilities, a recipient or applicant may not make selections with the purpose or effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination under any program to which this regulation applies, on the grounds of race, color, or national origin; or with the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the Act or this part."

Title 49 C.F.R. Part 21, Appendix C, Section (3)(iv) provides, "The location of projects requiring land acquisition and the displacement of persons from their residences and businesses may not be determined on the basis of race, color, or national origin."

The purpose of this fixed facility analysis is to assess the equity impacts of the five (5) ROMF alternatives evaluated during the New Starts Project Development Phase to demonstrate that selection of a preferred ROMF location is in accordance with Title VI and the implementing guidelines provided in FTA Circular 4702.1B.

2. Background

The purpose of the proposed D-O LRT Project is to provide a high-capacity transit service within the D-O Corridor between Chapel Hill and Durham, along the NC 54, I-40, US 15-501, Erwin Road, and NC 147 transportation corridors, that improves mobility, increases connectivity through expanding transit options, and supports future development plans.

2.1 Triangle Transit

Triangle Transit would operate the proposed light rail system in addition to its current public transportation services. The transit agency complies with Title VI and all related statutes. Its Title VI policies are discussed further in this section.

2.1.1 Organization

Triangle Transit currently operates the regional public transportation system (bus and shuttle service, paratransit services, ride matching, vanpools) and provides commuter resources and an emergency ride home program in the Raleigh-Durham-Chapel Hill area of North Carolina. Triangle Transit manages Durham's bus and paratransit services (GoDurham) and is also home to the GoTransit Regional Information Call Center.

2.1.2 Title VI Policies

Triangle Transit has developed policies and procedures in order to satisfy all aspects of Title VI and other federal and state laws, regulations, policies, and guidance. These policies are designed to ensure that no persons are denied the benefits of or subjected to discrimination on the grounds of race, color, national origin, sex, age, or disability under any program or activity implemented by Triangle Transit that receives federal financial assistance. These policies also provide for meaningful access to programs for persons with Limited English Proficiency (LEP).

Triangle Transit provides public notice of its policy to uphold and assure full compliance with Title VI and all related statutes on the agency's website (www.triangletransit.org). Information regarding Triangle Transit's Title VI policies and the procedures available for filing grievances associated with Title VI can be found in English and Spanish at http://triangletransit.org/title-vi. Triangle Transit's Title VI policies and procedures are also available upon request.

2.2 D-O LRT Project Planning

The D-O Corridor was identified as a high priority transit corridor in the 1990s due to rapid growth within the corridor. The D-O Corridor includes the University of North Carolina at Chapel Hill (UNC), Duke University, downtown Durham, and eastern Durham.

The proposed D-O LRT Project is a new light rail line roughly extending from southwest Chapel Hill to east Durham and connecting educational, medical, employment, and other important activity centers, park-and-ride lots, the Durham Amtrak Station, and the Durham Station. It would include approximately 17 miles of light rail service serving 17 stations.

2.2.1 Alternatives Considered

A No Build Alternative and Build Alternatives were evaluated for the proposed D-O LRT Project. The No Build Alternative serves as the basis of comparison for the Build Alternatives. These Build Alternatives include a NEPA Preferred Alternative and Project Element Alternatives (**Figure 2-1**). Project Element Alternatives include alignment alternatives for the Little Creek crossing and the New Hope Creek

Alternative	Description
No Build Alternative	Basis of comparison for the build alternatives
Build Alternatives:	
NEPA Preferred Alternative	Alternative recommended by the DEIS
Project Element Alternatives	Alternatives studied in detail but not recommended

crossing, alternative locations for the ROMF, and an alternative station location at the Duke/Durham Veterans Affairs (VA) Medical Centers.

2.2.2 NEPA Preferred Alternative

The NEPA Preferred Alternative would generally follow NC 54, I-40, US 15-501, and the North Carolina Railroad (NCRR) Corridor into downtown Durham and east Durham, as shown on **Figure 2-2**. The alignment would begin at UNC Hospitals, parallel Fordham Boulevard, proceed east along NC 54, travel north along I-40, parallel US 15-501 before turning east toward the Duke University campus along Erwin Road, and then follow the NCRR Corridor parallel to NC 147 through downtown Durham, before reaching its eastern terminus near Alston Avenue. The alignment would consist of at-grade alignment, fill and cut sections, and elevated structures.

The NEPA Preferred Alternative includes the C2A Alternative in the Little Creek section of the alignment, the NHC 2 Alternative in the New Hope Creek section, the Trent/Flowers Drive Station Alternative location for the Duke/VA Medical Centers Station, and the Farrington Road ROMF.

Figure 2-1: NEPA Preferred and Project Element Alternatives

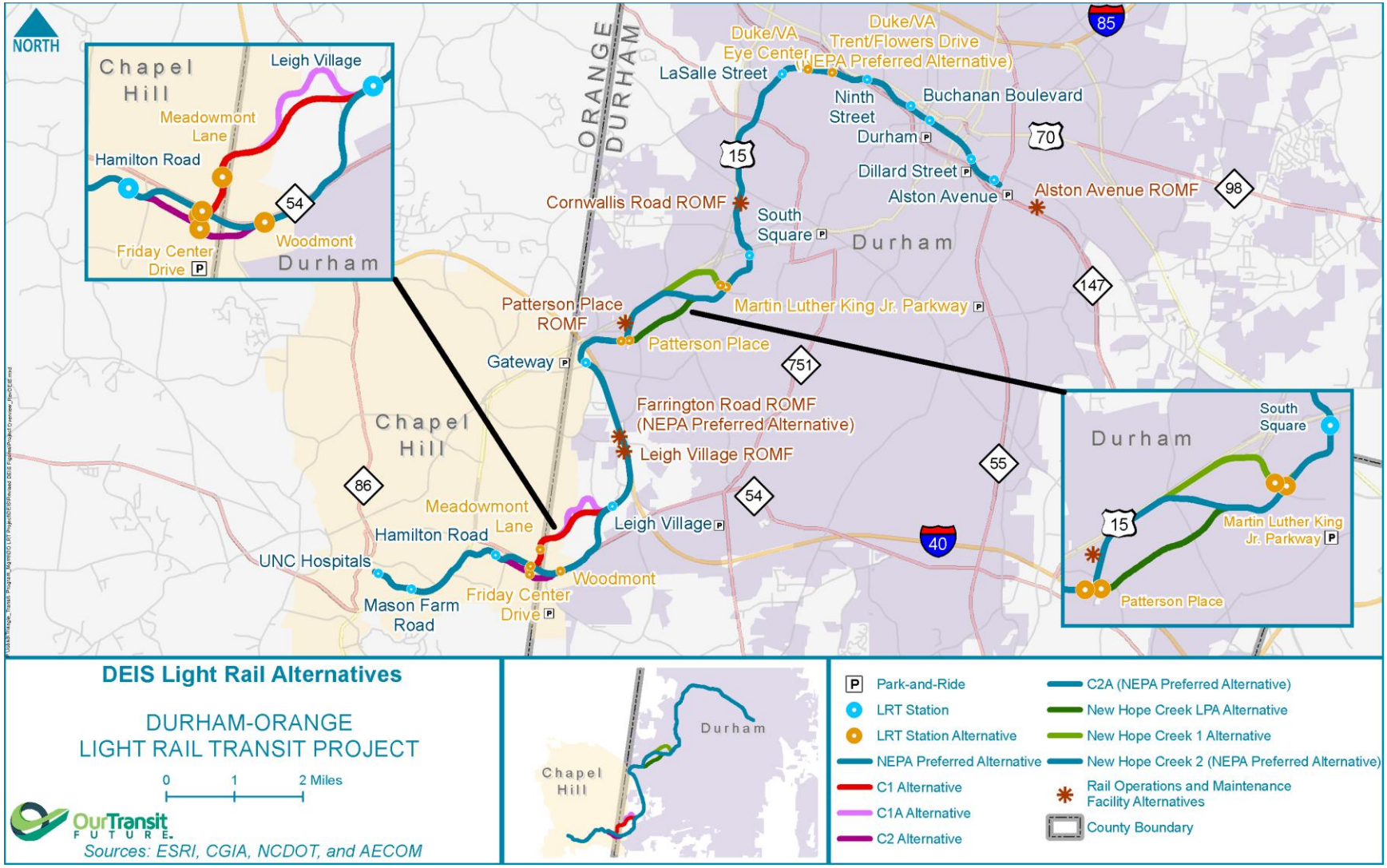
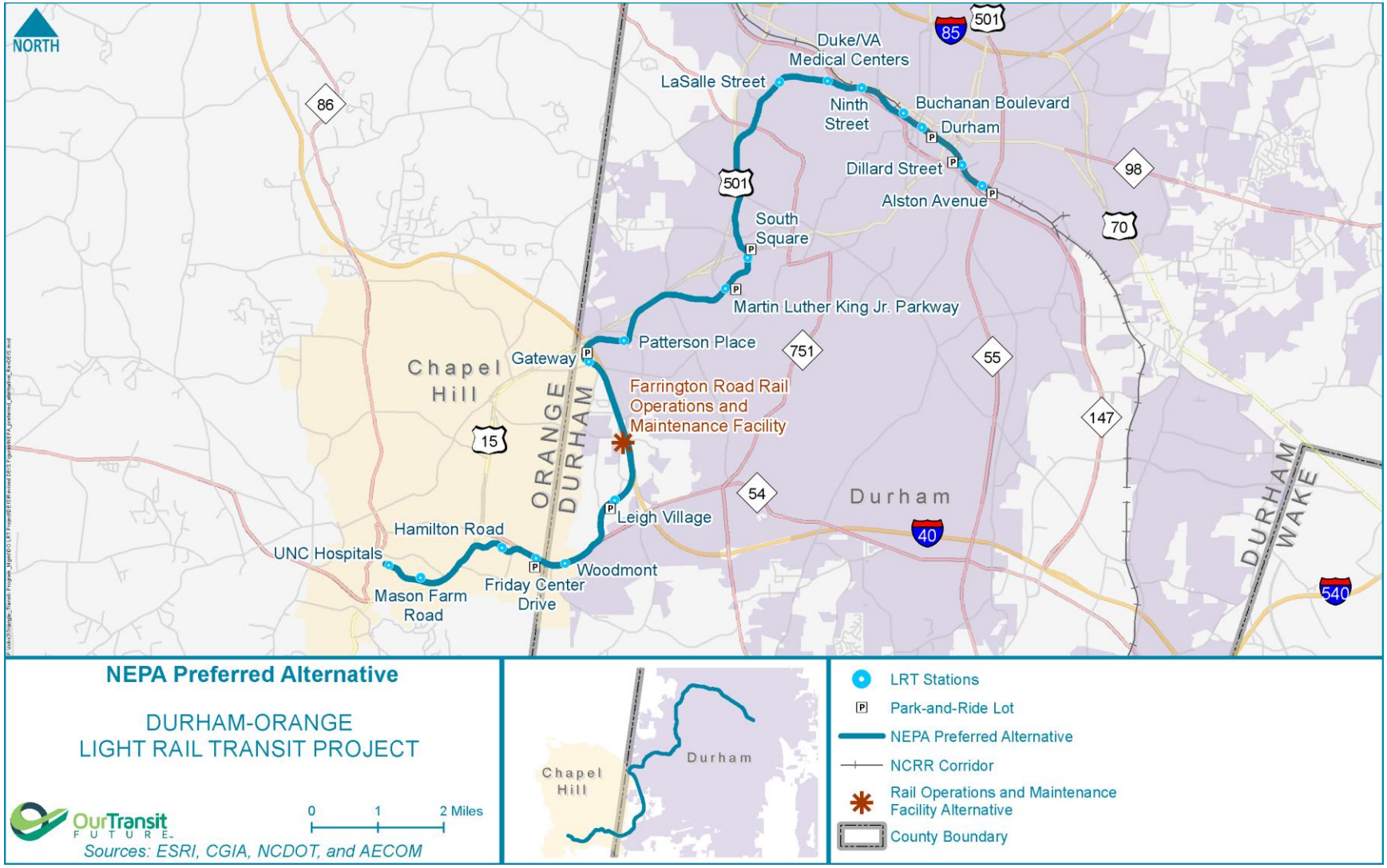


Figure 2-2: NEPA Preferred Alternative



2.3 ROMF Criteria and Alternatives

The ROMF includes a complex of train washing and maintenance buildings, storage tracks, employee parking, and a stormwater pond. The facility would be equipped to perform daily cleaning and repair activities on the light rail vehicles (LRV) as they enter and leave revenue service. To ensure operational safety and reliability, scheduled service and maintenance inspections would be performed in this facility. The desirable size for a ROMF site is 15 to 25 acres.

2.3.1 ROMF Location Criteria

As part of the Alternatives Analysis, the Leigh Village, Farrington Road, Patterson Place, and Cornwallis Road ROMF alternatives were identified based on sufficient acreage and length to accommodate the required functions, grading that could accommodate a ROMF, and other issues related to operations and functionality. The Alston Avenue ROMF Alternative was not initially considered as a potential ROMF site by Triangle Transit. However, due to a request from the City of Durham and after initial evaluation by Triangle Transit to ascertain the reasonableness of this site, the Alston Avenue ROMF Alternative was carried forward for further study in the DEIS.

The following basic functions were identified as requirements for the ROMF:

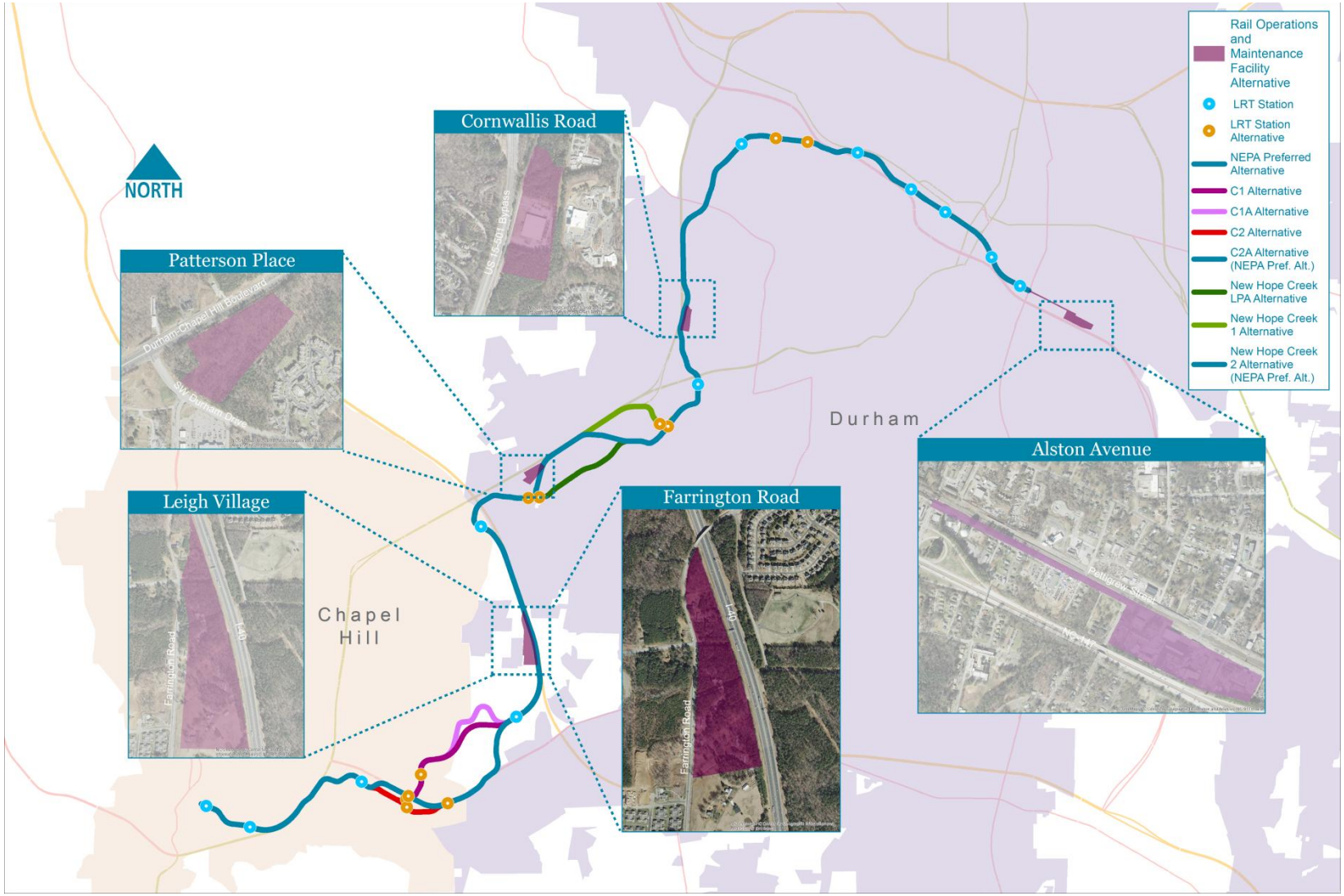
- Storage of a minimum of 15 LRVs, which includes 3 spares. Each LRV was assumed to be a low-floor articulated unit between 90 and 95 feet in length and up to 9 feet in width.
- Storage tracks to be double-ended and capable of storing trains in one, two or three car lengths.
- Storage tracks will have paved access areas between alternating storage tracks for access to vehicles for cleaning and inspection. Designs are based on 20-foot track centers where access areas are provided allowing 11-foot clearance between vehicles and 15-foot track centers in unpaved areas where catenary poles would be placed between tracks.
- Rail access to and from the mainline in either direction with crossovers between the mainline tracks located on the mainline at either end of the yard.
- Maintenance of Equipment activities.
- Transportation Employee activities to be provided for:
  - Maintenance of Way and Signals, Power, and Communications functions
  - Traction power Substation

2.3.2 Alternatives Considered

A total of five alternative locations were considered for the ROMF as illustrated on **Error! Reference source not found.**:

- Leigh Village ROMF
- Farrington Road ROMF
- Patterson Place ROMF
- Cornwallis Road ROMF
- Alston Avenue ROMF

Figure 2 3: Rail Operation and Maintenance Facility (ROMF) Alternative Sites



2.3.3 NEPA Preferred Alternative

After detailed evaluation and consideration of all potential ROMF sites, the Farrington Road ROMF site was determined to be the superior site and was included in the NEPA Preferred Alternative. The following were the primary reasons for the selection of the Farrington Road ROMF site:

- It is located on a long straight section of track, which accommodates cross-overs well for access to the yard and access to cross-overs is provided through the yard.
- It is the largest acreage of the five (5) ROMF sites studied.
- The site is reasonably flat making preparation of the site for construction easier.
- Effective screening buffers can be provided around the site.
- The site would have no adverse effects to historic resources.
- It has the lowest cost of all alternative ROMF locations.

The differentiating benefits and impacts for each ROMF alternative in comparison to the Farrington Road ROMF are summarized in

Table 2-1.

Table 2-1: ROMF Alternatives – Differentiating Benefits and Impacts

ROMF Alternative	Differentiating Benefits and Impacts	DEIS Recommendation
Leigh Village	▪ Part of the site is currently occupied by the National Register-eligible Walter Curtis Hudson Farm.	**The Leigh Village ROMF Alternative is not recommended for further consideration as the NEPA Preferred Alternative.** The Leigh Village ROMF Alternative would permanently use National Register of Historic Places-eligible Walter Curtis Hudson Farm. When compared against the other ROMF alternatives, there are other viable alternatives that would avoid this resource.
Patterson Place	▪ Smallest of the five alternatives considered. ▪ Not compatible with the NHC 1 and NHC 2 Alternatives because its location conflicts with the existing track alignment of these two alternatives.	**The Patterson Place ROMF Alternative is not recommended for further consideration as the NEPA Preferred Alternative.** The selection of NHC 2 as a component of the NEPA Preferred Alternative precludes the selection of this ROMF alternative.
Cornwallis Road	▪ In order to access the ROMF site and yard, a rail vehicle would exit from the main LRT alignment and travel along a long segment of single track, which could result in	**The Cornwallis Road ROMF Alternative is not recommended for further consideration as the NEPA Preferred Alternative.**

ROMF Alternative	Differentiating Benefits and Impacts	DEIS Recommendation
	delays to service. ▪ Does not have space necessary to allow for trains to turn around in the yard. ▪ Trains would have to enter from either side of the building which could pose a safety risk to operators and maintenance staff. ▪ Physical constraints preclude vehicle fleet or system expansion. ▪ More impacts to roadways. ▪ More consistent with land use plans. ▪ More impacts to community resources. ▪ Less impact to water resources than NEPA Preferred Alternative (Farrington Road). ▪ Higher anticipated capital cost.	Although this alternative would result in fewer overall impacts to water resources than the NEPA Preferred Alternative (Farrington Road), this alternative may result in adverse impacts to community resources. In addition, the NEPA Preferred Alternative would allow for a superior yard layout from an operational perspective, whereas the Cornwallis Road ROMF site would require operational compromises and higher operations and maintenance costs.
Alston Avenue	▪ More consistent with land use plans. ▪ No impacts to natural and water Resources. ▪ Less desirable light rail operations because trains would enter and exit from one direction. ▪ The Alston Avenue ROMF Alternative would introduce two high risk and eight medium risk sites for hazardous material to the project. ▪ More acquisitions, relocations, and displacements. ▪ Located in an active industrial area and would displace multiple businesses with between 150 and 250 existing jobs. ▪ Highest anticipated capital cost. ▪ Located within an EJ area.	**The Alston Avenue ROMF Alternative is not recommended for further consideration as the NEPA Preferred Alternative.** Although this alternative would not require rezoning, it would introduce several risks to both the project schedule and budget, associated with the potential of hazardous materials remediation and relocation of businesses. It also has the potential to result in net loss of employment within the D-O Corridor if the existing businesses that would be displaced could not be relocated within the D-O Corridor. This alternative has the highest capital cost of all of the alternatives considered in this DEIS.

3. Analysis Methodology

This Title VI analysis for the ROMF alternative sites was conducted using American Community Survey 5-year estimate (2007-2011) data at the block group level. The block group level was chosen for this analysis because it provides a more localized perspective than would the census tract level.

Minority, low-income, and LEP populations were identified in the block groups touched by the five ROMF alternative sites. These populations were then compared to the D-O LRT Project Study Area (**Table 3-1**) and shown on **Error! Reference source not found.**. The study area is defined by eight evaluation areas: UNC Campus, east Chapel Hill, Leigh Village, US 15-501 Corridor, Duke West Campus and Medical Center, Old West Durham/Duke East Campus, downtown Durham, and east Durham.

This analysis was conducted to ensure that a ROMF alternative is selected without regard to race, color, or national origin.

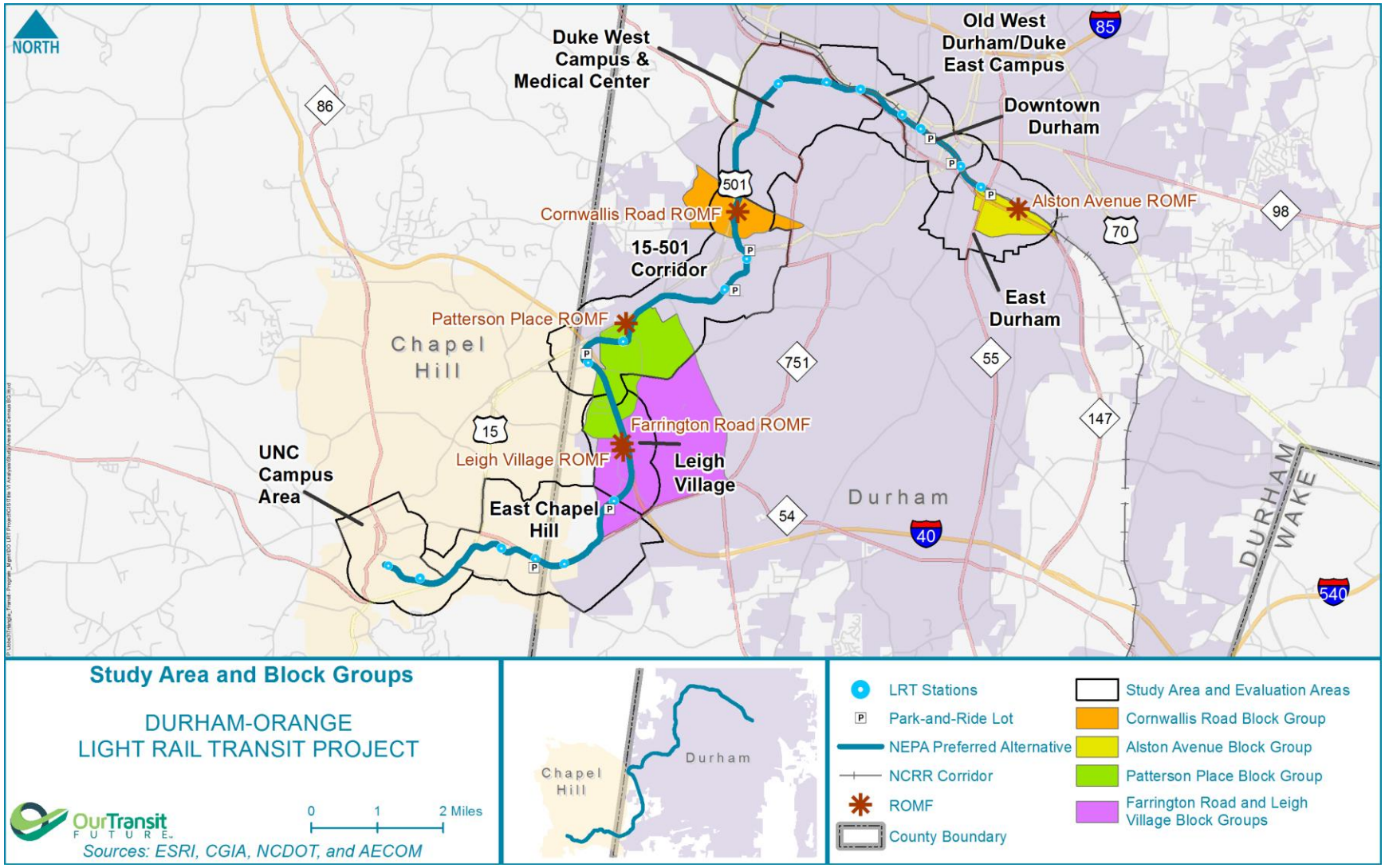
Table 3-1: Demographics at ROMF Alternative Sites

Area	Geography	Population	Minority	Low-Income	Limited English Proficiency
Leigh Village ROMF	Block Groups 2 and 3, Census Tract 20.18	5,322	1,626[b] (31%)	1,148 (22%)	230[b] (5%)
Farrington Road ROMF[a]	Block Groups 2 and 3, Census Tract 20.18	5,322	1,626[b] (31%)	1,148 (22%)	230[b] (5%)
Patterson Place ROMF	Block Group 2, Census Tract 20.18	2,923	1,050 (36%)	1,086 (37%)	136 (5%)
Cornwallis Road ROMF	Block Group 2, Census Tract 20.17	1,692	257 (15%)	32 (2%)	26 (2%)
Alston Avenue ROMF	Block Group 2, Census Tract 14	1,990	1,990 (100%)	1,416 (71%)	57 (5%)
Study Area	D-O LRT Project Study Area	60,300	30,753 (51%)	25,929 (43%)	10,854 (18%)
State	North Carolina	9,418,736	3,243,959 (34%)	2,425,105 (26%)	429,297 (5%)

[a] Farrington Road ROMF is included in the NEPA Preferred Alternative.

[b] During the public outreach process, it was determined that two out of six property owners at the Leigh Village and Farrington Road ROMF sites are minorities. Spanish is the primary language for one of the two minority property owners.

Figure 3-1: Study Area and Block Groups



3.1 Minority Populations

Minority populations were identified using American Community Survey *Table B03002 Hispanic or Latino Origin by Race.* Minorities are individuals that are not white or Hispanic. This analysis was conducted at the block group level using 2007-2011 5-year estimates.

3.2 Low-Income Populations

Low-income populations are defined as any individual or household with income at or below the U.S. Census poverty thresholds. As suggested by FTA Circular 4702.1B, all individuals whose family income is at or below 150 percent of the poverty line were considered low-income. Low-income populations were identified using American Community Survey *Table C17002 Ratio of Income to Poverty Level in the Past 12 Months.* This analysis was conducted at the block group level using 2007-2011 5-year estimates.

3.3 LEP Populations

LEP populations are defined by FTA Circular 4702.1B as "persons for whom English is not their primary language and who have a limited ability to read, write, speak, or understand English. It includes people who reported to the U.S. Census that they speak English less than very well, not well, or not at all." LEP populations were identified using American Community Survey *Table B16001 Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over*. This analysis was conducted at the block group level using 2007-2011 5-year estimates.

3.4 Similar Facilities

In accordance with FTA Circular 4702.1B, facilities with similar impacts as the ROMF were considered to determine if any cumulative adverse impacts might result. Existing maintenance facilities operated by area transit agencies were included in this analysis:

- Chapel Hill Transit (CHT) Maintenance Facility: 6902 Millhouse Rd., Chapel Hill, NC 27516
- Duke University Maintenance Facility: 616 Wilkerson Ave., Durham, NC 27701
- GoDurham Maintenance Facility: 1820 N Miami Blvd., Durham, NC 27704
- GoTriangle Maintenance Facility: 5201 Nelson Rd., Morrisville, NC 27560
- UNC Chapel Hill Maintenance Facility: Municipal Dr., Chapel Hill, NC 27516

The distances from each maintenance facility to each ROMF are listed in

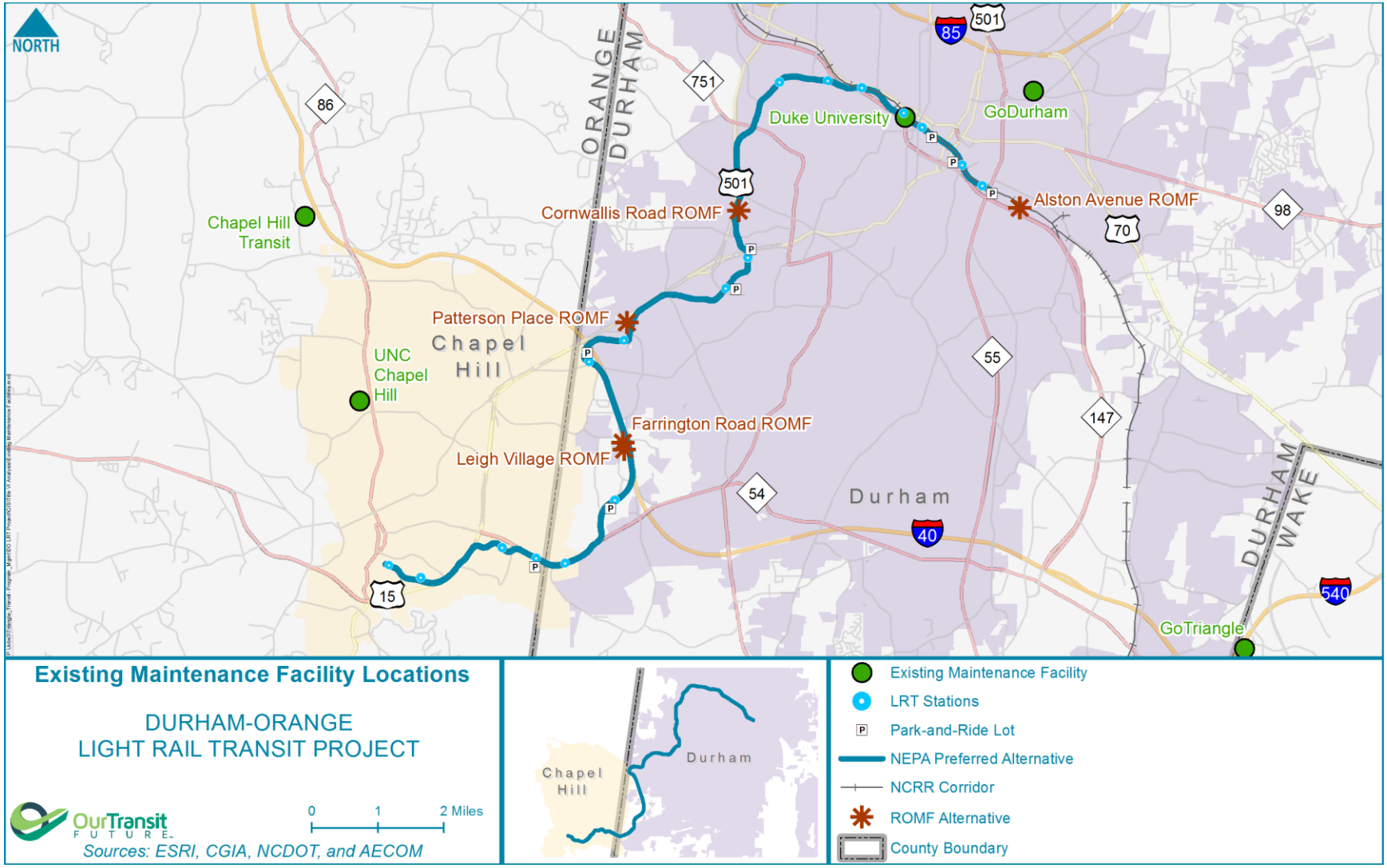
Table 3-2. The distances range from 1.8 to 10.8 miles away from the ROMF alternatives. None of the maintenance facilities share a block group with any of the ROMF alternatives considered as part of the D-O LRT Project. The maintenance facilities in relation to the ROMF alternatives are shown in **Figure 3-2**.

Table 3-2: Maintenance Facility Distances (Miles) to ROMF Alternatives

ROMF	GoTriangle Maintenance Facility	UNC Maintenance Facility	CHT Maintenance Facility	Duke Maintenance Facility	GoDurham Maintenance Facility
Farrington Road	9.9	4.1	5.9	6.5	8.2
Leigh Village	9.9	4.1	6.0	6.6	8.2
Patterson Place	10.6	4.2	5.1	5.2	7.1
Cornwallis Road	10.1	6.4	6.6	2.9	4.8
Alston Avenue	7.5	10.4	10.8	2.2	1.8

*All distances on Table 3-2 are measured in miles.

Figure 3-2: Existing Maintenance Facility Locations Operated by Area Transit Agencies



4. Effects on Title VI Populations

The Farrington Road ROMF (NEPA Preferred Alternative), Leigh Village, Patterson Place, and Cornwallis Road ROMF alternatives are located in block groups with lower than the study area averages for minority, low-income, and LEP populations. The Alston Avenue ROMF is located in a block group with higher averages for minority and low-income populations than the study area.

Because the ROMF alternatives - with the exception of the Alston Avenue ROMF - are located in block groups with lower averages for Title VI populations than the study area, disparate impacts to these populations are not anticipated. However, since the minority and low-income populations in the vicinity of the Alston Avenue ROMF are greater than the study area averages, disparate impacts to these populations may occur. Therefore, the Farrington Road ROMF selection associated with the NEPA Preferred Alternative is consistent with Title VI of the Civil Rights Act of 1964.

4.1 Minority Populations

The minority populations within the vicinity of the ROMF alternatives range from 15 percent to 100 percent, compared to 51 percent in the study area. The minority population in the vicinity of the Farrington Road ROMF (NEPA Preferred Alternative) is 31 percent, and in the vicinity of the Alston Avenue ROMF Alternative it is 100 percent. The minority population in the vicinity of the other three ROMF alternatives is less than the study area average.

Conclusion of Effects

The Farrington Road ROMF (NEPA Preferred Alternative), Leigh Village, Patterson Place, and Cornwallis Road ROMF alternatives would not be expected to have disparate impacts on the basis of race, color, or national origin because they are located in block groups with minority populations less than the study area average. The Alston Avenue ROMF may result in disparate impacts to minority populations because it is located in a block group with a minority population percentage greater than the study area average.

4.2 Low-Income Populations

The low-income populations within the vicinity of the ROMF alternatives range from 2 percent to 71 percent, compared to 43 percent in the study area. The minority population in the vicinity of the Farrington Road ROMF (NEPA Preferred Alternative) is 22 percent, and in the vicinity of the Alston Avenue ROMF Alternative it is 71 percent. The low-income population in the vicinity of the other ROMF alternatives is less than the study area average.

The Farrington Road ROMF (NEPA Preferred Alternative), Leigh Village, Patterson Place, and Cornwallis Road ROMF alternatives would not be expected to have disparate impacts on the basis low-income populations because they are located in block groups with low-income populations less than the study area average. However, the Alston Avenue ROMF may result in disparate impacts to low-income populations because it is located in a block group with a low-income population percentage greater than the study area average.

4.3 LEP Populations

The LEP populations within the vicinity of the Farrington Road ROMF (NEPA Preferred Alternative), Leigh Village, Patterson Place, and Alston Avenue ROMF alternatives are 5 percent while the LEP population is

2 percent in the vicinity of the Cornwallis Road ROMF. The LEP population of the study area is 18 percent.

The Farrington Road (NEPA Preferred Alternative) and other ROMF alternatives would not be expected to result in a disparate impact on the basis of national origin because they are all located in block groups with LEP populations less than the study area average.

4.4 Similar Facilities

A survey of existing transit agency maintenance facilities determined that none exist in the vicinity of any of the ROMF alternatives. The distances range from 1.8 to 10.8 miles away from the ROMF alternatives. Furthermore, none of the maintenance facilities share a block group with any of the ROMF alternatives.

No adverse cumulative impacts resulting from similar transit maintenance facilities are expected for any of the ROMF alternatives given the distances between them and the maintenance facilities operated by the area transit agencies.

5. Outreach

For Triangle Transit, education, inclusion, transparency, accountability, and responsiveness have been key principles of the planning process for the D-O LRT Project. The engagement of local residents, business owners, and other stakeholders began with scoping (2012) and is on-going. The outreach program was conducted in accordance with the D-O LRT Project Public Involvement Plan, EO 12898, and guiding principles contained in FTA Circular 4703.1.

The goals of Triangle Transit's public involvement and agency coordination include the following:

- To inform the community and appropriate agencies about the proposed D-O LRT Project and its progress
- To actively seek and integrate participation from the public and appropriate agencies in the decision-making process
- To align project goals with the needs of the community
- To inform affected residents, including low-income and minority populations
- To ensure that the proposed D-O LRT Project meets federal, state, and local requirements for public involvement.

Outreach efforts were designed to provide all community members with equal opportunities to engage in the decision-making process. Many of the proposed D-O LRT Project's public and stakeholder meetings were held in low-income and minority communities. Small group and public meetings/workshops were held throughout the D-O Corridor. The meetings were held on weekdays and weekends, and in different locations at different times of the day, to facilitate attendance by all members of the community (for more information on public outreach, refer to DEIS chapter 9 and to DEIS Appendix I, Environmental Justice Supporting Documentation which are specifically incorporated herein by reference.) Examples of steps taken to ensure equal opportunity access include the following:

- Holding public open houses within a quarter mile of a bus stop within the D-O Corridor
- Attending meetings and events including the following:
  - Small group meetings with the residents of the Oak Creek Village Apartments, a primarily Latino apartment complex near US 15-501 and Garrett Road
  - Staffing a project information booth at Durham's Annual Latino Festival

  - Presentation at NC Hispanic Heritage luncheon
  - Staffing a project information booth at El Centro Health Fair
  - Providing Spanish translator at all public open houses and public meetings; also provided at specific events and small group meetings upon request
  - Providing Chinese translator at public open houses and public meetings
  - Media placements in La Conexion, an Hispanic newspaper, and ESPN – Deportes, an American Spanish language digital cable and satellite sports television channel
- Making community visits and holding public meetings in the east Durham and Downtown Durham EJ target areas, including:
  - Durham Armory (location of one public meeting)
  - McDougald Terrace (three community visits)
  - Hayti Heritage Center (location of two public meetings)
  - Coalition for Affordable Housing and Transit (seven meetings)
  - Northeast Central Durham Leadership Council (two meetings)
  - National Association for the Advancement of Colored People (NAACP) Chapel Hill-Carrboro Chapter (one meeting)
  - Durham Housing Authority (DHA) (eight meetings including community visits; project materials distributed to residents at all 15 DHA properties)
  - Durham Station (location of one public meeting, two public open houses)
  - Partners Against Crime (PAC) 1 meeting (one meeting)
  - Durham Compact Neighborhood Design meetings (three meetings)
  - East Durham Residents for Rail (four meetings)
  - East Durham Residents (4 meetings)
  - Oldham Towers Resident Council Meeting (one meeting)
  - John Avery Boys and Girls Club (one meeting and one public open house)
  - East Durham Leaders (one meeting)
  - East Durham Food Council Event (one event)
  - Meeting with North Carolina Central University (NCCU); NCCU has been involved since the Alternatives Analysis phase of the project as part of the Steering Committee)
  - Centerfest Street Festival – Fayetteville Street, attracts east Durham Residents (one event)
  - Old West Durham Block Party (one event)
  - Phoenix Fest (one event)
  - EmPOWERment Inc., a Chapel Hill charity (one meeting)
  - Distributed flyers to the following businesses on Driver and Angier Street to advertise November 2014 public meetings. Also spoke with business owners.
    - Joe's Diner Durham
    - Signature Kutz Barber Shop
    - Samuel & Sons
  - Thomas Poole – NAACP member and previous PAC 1 co-facilitator (one meeting)
  - James Chavis – PAC 1 co-facilitator (five meetings)
  - Jesus Word Church Leadership (two meetings)
  - Distributed flyers to businesses on Driver and Angier Street to advertise November public meetings
- Making community visits and holding public meetings in the north of Erwin Road EJ target area. The meeting was held at Another Broken Egg Café (open house).
- Making community visits and holding public meetings in the US 15-501 Corridor EJ target area:
  - Eno Fellowship (two public meetings)

- Springhill Suites/Marriott (public meeting)
- ITT Technical Institute (two open houses)
- Durham County Library Southwest (open house)
- Oak Creek Village (two community visits)

- Requesting referrals and project publicity from special organizations: Justice United; Durham Congregations, Associations and Neighborhoods; El Centro; and Durham Rescue Mission.

Based on feedback received from EJ communities in the D-O Corridor, a primary point of interest is providing improved access to proposed stations. In east Durham in particular, Triangle Transit is working with communities to plan improved bus infrastructure in advance of the proposed D-O LRT Project as well as bus connections to the proposed D-O LRT stations. **Table 5-1** summarizes some of the major concerns in the EJ communities related to the ROMF locations and the actions that Triangle Transit has taken to address them.

Table 5-1: EJ Community ROMF Concerns Expressed and Triangle Transit Actions/Response

ROMF Alternative	Major Issues/Concerns	Actions/Responses
Cornwallis ROMF	Visual impacts along US 15-501	Triangle Transit would use interdisciplinary design teams to create aesthetic guidelines and standards in the design of project elements. Triangle Transit would integrate facilities with area redevelopment plans, minimize clearing for construction and operation, plant appropriate vegetation in and adjoining the project right-of-way, and use source shielding in exterior lighting at stations and auxiliary facilities.
Alston Avenue ROMF	Concern over business displacements due to selection of the Alston Avenue ROMF site	In addition to Triangle Transit's efforts with the local jurisdictions to develop affordable housing policies, any privately-owned businesses that are displaced by the project will be compensated in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and its implementing regulations (42 U.S.C. § 4601 et seq.; 49 C.F.R. Part 24)
All ROMF Sites	Concern that Triangle Transit is in violation of Title VI of the Civil Rights Act of 1964 and NEPA by not conducting a detailed study of the conceptual alignment, stations, and ROMF sites ▪ Title VI complaint, January 7, 2015 ▪ Appeal of Triangle Transit's Decision Regarding Title VI Complaint, January 26, 2015 ▪ Additional Information for Title VI Complaint and Appeal, February 27, 2015	The EEO office of Triangle Transit conducted a thorough review of the complaint and investigated the allegations. ▪ Response to Title VI complaint, January 20, 2015 (investigation did not find any evidence to support alleged Title VI and NEPA violations) ▪ Response to Appeal of Triangle Transit's Decision Regarding Title VI Complaint, February 10, 2015 (analyses required for Title VI are separate legal requirements from NEPA, and there is no set order for performing the Title VI analyses with respect to NEPA) ▪ Response to additional information and

ROMF Alternative	Major Issues/Concerns	Actions/Responses
	▪ Correspondence regarding Title VI Complaint and Appeal, June 2, 2015	correspondence June 23, 2015 (no requirement for Equity Analysis to be completed during NEPA phase; DEIS will not contain a Title VI Equity Analysis but will include an EJ analysis)

Source: AECOM and Triangle Transit 2015.

6. Conclusion and Basis for Selection of NEPA Preferred Alternative ROMF Site

All alternatives identified and evaluated for the location of the ROMF were selected without regard to race, color, or national origin. Minority, low-income, and LEP populations were evaluated at the census block group level in the vicinities of the five alternatives. The averages for these populations in the vicinity of the Farrington Road alternative (i.e., NEPA Preferred Alternative) are lower than the study area averages. Therefore, disparate impacts to these populations are not anticipated with the selection of the NEPA Preferred ROMF Alternative. A survey of other transit facilities operated by area transit agencies demonstrates that there are no facilities with similar impacts in close proximity to of the Farrington Road ROMF Alternative that would result in adverse cumulative impacts.

Therefore, the selection of the Farrington Road ROMF site as part of the NEPA Preferred Alternative is not expected to result in disparate impacts to Title VI populations. Inclusion of the Farrington Road ROMF site in the NEPA Preferred Alternative is consistent with Title VI of the Civil Rights Act of 1964, Title 49 C.F.R. Part 21, and implementing guidance promulgated by FTA in Circular 4702.1B.