



U.S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION IX  
Arizona, California,  
Hawaii, Nevada, Guam  
American Samoa,  
Northern Mariana Islands

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Mr. Scott Smith, CEO  
Valley Metro  
101 North First Avenue, Suite 1300  
Phoenix, AZ 85003

**FEB 05 2019**

Re: Environmental Assessment and Finding  
of No Significant Impact for the Proposed  
Northwest Phase II Light Rail Extension  
Project

Dear Mr. Smith,

Based on our review of the Environmental Assessment, dated September 5, 2018, the Federal Transit Administration (FTA) has issued a Finding of No Significant Impact (FONSI) for the proposed Northwest Phase II Light Rail Extension Project. A copy of the FONSI is enclosed.

The FONSI and supporting documentation should be made available to affected government agencies and the public and should be posted on the project website. A Notice of Availability for the FONSI should be published in local newspapers and should also be provided directly to affected government agencies, including State intergovernmental review contacts established under Executive Order 12372.

Please note that the standard terms and conditions of the grant contract will require Valley Metro to undertake the mitigation actions identified in the Environmental Assessment and FONSI.

Thank you for your cooperation in meeting the requirements of the National Environmental Policy Act. If you have any questions about our review, please contact Dominique Kraft, Community Planner, at (415) 734-9469 or [dominique.kraft@dot.gov](mailto:dominique.kraft@dot.gov).

Sincerely,

  
for Ray Tellis  
Regional Administrator

Enclosure

## **Finding of No Significant Impact**

**Grant Applicant:** Valley Metro

**Project:** Northwest Phase II Light Rail Extension

**Project Location:** City of Phoenix, Maricopa County, Arizona

Valley Metro in cooperation with the Federal Transit Administration (FTA) prepared the September 2018 Environmental Assessment (EA) for the Northwest Phase II Light Rail Extension Project (the “Project”) pursuant to requirements of the National Environmental Policy Act (NEPA) of 1969 (42 United States Code [USC] 4321 et seq.), the Federal Public Transportation Law (49 USC Chapter 53), the Clean Air Act (42 USC 7401 et seq.), the Clean Water Act (33 USC 1250 et seq.), the National Historic Preservation Act (54 USC 300101 et seq.), Section 4(f) of the Department of Transportation Act of 1966 (49 USC 303 and 23 USC 138) and its implementing regulations in 23 Code of Federal Regulations [CFR] 774, the Endangered Species Act of 1973 (16 USC 1531–1544), Executive Order (EO) 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations), EO 11988 (Floodplain Management), and EO 11990 (Protection of Wetlands). This Finding of No Significant Impact (FONSI) hereby incorporates the EA by reference.

### **Description of the Project**

Valley Metro, in coordination with the City of Phoenix, proposes to construct the Northwest Phase II Light Rail Extension Project. The Project would extend light rail service approximately 1.5 miles northwest from the existing Valley Metro light rail line at Dunlap and 19th Avenues to Metrocenter on the western side of Interstate 17 (I-17). The light rail alignment would travel west along Dunlap Avenue from 19th Avenue to 25th Avenue, where it would turn north and continue along 25th Avenue, crossing the Arizona Canal and Arizona Canal Diversion Channel (ACDC) and then continuing north to Mountain View Road, where it would turn west. At Mountain View Road just west of 25th Avenue, the alignment would begin transitioning to an aerial structure and cross I-17 on a new bridge. After crossing I-17, the alignment would turn north and terminate with an elevated station just north of Cheryl Drive and over the southbound I-17 frontage road.

The Project would build three new light rail stations along the route: at Dunlap Avenue/25th Avenue, Mountain View Road/25th Avenue and Metrocenter. The Project would use light rail vehicles similar to those currently used in the Valley Metro system, powered by an overhead catenary system (overhead power lines). The current bus transit center located in the southwestern quadrant of Metrocenter would be relocated adjacent to the Metrocenter light rail station and park-and-ride to provide for more convenient transfers between rail and bus. The relocated transit center would convert the Souper Salad restaurant building (10005 North Metrocenter Parkway) into part of the transit center.

The Project would include two new park-and-ride facilities at Mountain View Road/25<sup>th</sup> Avenue light rail station and at Metrocenter. The park-and-ride facility located near the Mountain View Road/25th Avenue light rail station would add approximately 179 spaces to the Rose Mofford Sports Complex. Of these 179 spaces, roughly 146 spaces would make up the park-and-ride lot shared by Rose Mofford Sports Complex users and transit users. An additional 33 spaces would be added to the southern end of the existing dog park parking lot and would be provided for sports

complex users only. The second park-and-ride facility would provide approximately 260 parking spaces in the Metrocenter parking lot adjacent to the Dillard's department store.

The Project would replace the two bridges on 25th Avenue over the Arizona Canal and ACDC. The new bridges would be wider to accommodate traffic and bicycle lanes and the light rail bidirectional track. The Project would also require construction of an elevated structure to allow the light rail vehicles to cross over the I-17 freeway to access Metrocenter. The guideway would transition from at grade to an elevated structure on Mountain View Road just west of 25th Avenue and then transition to a bridge crossing over the freeway into Metrocenter west of I-17.

The Project would maintain existing traffic lane capacities on all streets that it traverses, including Mountain View Road, I-17 and the I-17 frontage roads (North Black Canyon Highway) over which the elevated structure would cross.

The Project requires the acquisition of right-of-way (ROW), including the relocation of three businesses to accommodate the light rail guideway, stations, traction power substations and signal buildings. Section 2.2.2 of the EA provides a more detailed description of the Project.

### **Alternatives Considered**

The EA evaluated two alternatives: a No-Build Alternative, which describes future transportation facilities and services in 2040 if the Project were not built, and a Build Alternative (the Project), described above. The EA identifies the Project as the Preferred Alternative.

The No-Build Alternative is defined as the existing transit and roadway/highway system plus programmed (committed) transportation improvement projects as part of the Maricopa Association of Governments (MAG) *Regional Transportation Plan* (RTP) and corresponding Transportation Improvement Program (TIP) by 2040, along with any City-programmed transportation or transportation infrastructure improvements. Under the No-Build Alternative, the Project corridor would remain in its current state for the foreseeable future, and no construction would occur other than what has been previously programmed.

### **Outreach and Public Opportunity to Comment**

The EA was released for public review on September 20, 2018, and remained available for review until October 22, 2018. The Notice of Availability of the EA and notice for the public meeting was issued in local newspapers including the *Arizona Republic* and *La Voz* (Spanish language). The EA was also announced in news releases and media advisories in both Spanish and English, distribution of over 4,700 bilingual door hangers throughout the corridor and through emails to more than 367 Project stakeholders. Copies of the EA were made available for viewing at the Cholla Library at Metrocenter. The EA was posted on the Valley Metro website at: <https://www.valleymetro.org/northwest2>.

A public meeting was held at College America on October 4, 2018. During the review period of the EA, FTA and Valley Metro received fourteen comments at the public meeting, one comment by electronic submittal, and one comment received in the mail from the Hopi Tribe. The comments received do not require any revisions to the EA. Comments pertained to support for the project, suggestions for safety and security measures, station design, bicycle and pedestrian connections, the elevated end of line station, and concerns for small businesses. A list of comments received during the public review period of the EA and responses to those comments are included in Attachment A.

## **Determinations and findings**

Valley Metro, in cooperation with FTA, prepared an EA in September 2018 to evaluate the environmental impacts of the Project pursuant to requirements of NEPA, as codified in 23 CFR 771.119 and 23 USC 139. FTA served as the federal lead agency under NEPA. The findings required by Federal environmental laws and Executive Orders are outlined below.

### *Air Quality Conformity*

The Project satisfies the U.S. Environmental Protection Agency's transportation conformity requirements for air quality under 40 CFR Part 93. In June 2017, MAG prepared an air quality conformity analysis for the Fiscal Year 2018–2022 TIP and the 2040 RTP and its amendment. The Northwest Phase II Light Rail Extension Project is included in the TIP and the 2040 RTP and its amendment. On September 27, 2017, the MAG Regional Council indicated that the 2040 RTP and its amendment complied with the air quality provisions of the State Implementation Plan (SIP) for achieving the National Ambient Air Quality Standards and adopted the 2040 RTP and its amendment. In October 2017, the Federal Highway Administration and FTA issued a finding of air quality conformity for the TIP and 2040 RTP, as adopted by MAG.

The Project was determined not to be a project of air quality concern consistent with 40 CFR 93.123(b)(1). Therefore, a hot-spot analysis for particulate matter (PM<sub>2.5</sub> and PM<sub>10</sub>) was not required. A project-level carbon monoxide (CO) screening (hot-spot analysis) was completed for the Project, as documented in Section 3.7.3 of the EA. The Project involves an electrically powered light rail line and would not operate vehicles that contribute to diesel particulate matter emissions. The Project would not cause or contribute to any new violation of any air quality standard in any area; increase the frequency or severity of any existing violation of any standard in any area or delay timely attainment of any standard or any required interim emission reductions or other milestones in the area. FTA finds that the Project would not result in a significant impact on air quality.

### *Section 106 of the National Historic Preservation Act*

In accordance with Section 106 of the National Historic Preservation Act (54 USC 300101 et seq.) and its implementing regulations at 36 CFR Part 800, FTA, in coordination with Valley Metro and the City of Phoenix Historic Preservation Office, defined an area of potential effect (APE). The Arizona State Historic Preservation Office (SHPO) concurred with the delineation of the APE on July 10, 2017 (Attachment B). A literature and records search was conducted and no known archaeological sites or traditional cultural properties were recorded within the APE.

FTA and Valley Metro initiated consultation with Native American tribes and other parties on February 9, 2017. They were provided an opportunity to share information or concerns regarding potential impacts on prehistoric sites, sacred sites and/or traditional cultural properties consistent with 36 CFR 800.2 and 36 CFR 800.4. In their letter dated, September 26, 2018, the Hopi Tribe acknowledged FTA and Valley Metro's efforts for ongoing consultation and identification of cultural resources. They commented that if any cultural features or deposits or Native American human remains or funerary objects are encountered during project activities that consultation with SHPO and reporting occur as required by law (See Attachment A for a summary of the Hopi Tribe's comment letter and a response to their comment).

The Project would repurpose Souper Salad Building, formerly the Western Savings and Loan Branch Bank building, as part of the transit center at the Metrocenter light rail station. The Western

Savings and Loan Branch Bank building was determined eligible for the National Register of Historic Places. In their letter dated July 10, 2017 (Attachment 1), SHPO concurred on the determination of eligibility. Alterations to the property would be done in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties [36 CFR Part 68] to ensure that the property retains its historic integrity and ability to convey its historic significance. The City of Phoenix and the SHPO would enter into a preservation covenant to ensure long-term protection of the Western Savings and Loan Branch Bank, and Valley Metro would prepare a National Register of Historic Places nomination for the property.

FTA determined that the Project would result in a no adverse effect to historic properties. In their letter dated October 22, 2018, SHPO concurred with FTA's finding of no adverse effect (See Attachment B).

#### Section 4(f) of the Department of Transportation Act of 1966

As discussed in Section 3.11 of the EA, the Project is located near parks and other historical resources that qualify as Section 4(f) resources under Section 4(f) of the Department of Transportation Act of 1966, codified in 49 USC 303 and its implementing regulations at 23 CFR Part 774. The Project would result in a direct use with *de minimis* impacts to three recreational resources (Rose Mofford Sports Complex, Arizona Canal Trail, and Sun Circle Trail) and one historic resource (Western Savings and Loan Branch Bank), which are considered Section 4(f) resources.

The Project would add approximately 179 parking spaces to the Rose Mofford Sports Complex. Additional project work includes relocation of a driveway into the sports complex, an access road for maintenance and emergency vehicles and a sidewalk. A portion of the existing landscaped buffer fronting 25th Avenue, a landscaped area adjacent to the softball fields and the landscaped area just south of the dog park would be converted into parking. No recreational amenities are within these landscaped areas. These changes would result in a permanent incorporation of land into transportation uses, which is considered a direct use under Section 4(f). In the long term, the Rose Mofford Sports Complex would benefit from the Project through the addition of parking, enhanced transit access to the facility, and improved transportation and pedestrian circulation within the sports complex. The Project would not substantially impair the activities, features or attributes qualifying the Rose Mofford Sports Complex for protection under Section 4(f). Therefore, FTA has determined that the Project would result in a direct use with *de minimis* impacts to Rose Mofford Sports Complex, consistent with 23 CFR 774.17(5). The City of Phoenix owns and manages the Rose Mofford Sports Complex and is considered the agency with jurisdiction over the complex, concurred with the *de minimis* impact finding on October 26, 2018 (Attachment B).

Construction activities at the Rose Mofford Sports Complex would require traffic and access detours to the complex and construction staging areas, which would temporarily reduce parking at the complex. Therefore, the Project would result in a temporary occupancy of this Section 4(f) recreational resource. Access to the sports complex would be maintained during construction. The temporary occupancies would not interfere with the protected activities, features or attributes of the recreational resources. FTA finds that pursuant to 23 CFR 774.13(d), the temporary occupancy is so minimal, it would not constitute as a use. The City of Phoenix concurred on October 26, 2018 (See Attachment B).

The Project would result in a direct use of the Arizona Canal Trail and Sun Circle Trail. The widening of the existing bridges over the Arizona Canal and ACDC would permanently convert small portions (approximately 405 sqft. of the Sun Circle Trail and 810 sqft. of the Arizona Canal Trail) of both trails to a transportation use, as described in Section 3.11.3.2 of the EA. The trails would be on the same, at-grade alignment and would retain their continuity. FTA determined that the impacts to the trails would be *de minimis*.

Construction activities would require closure of portions of the Sun Circle and Arizona Canal Trails at 25th Avenue for a limited period of time for safety reasons, resulting in a temporary occupancy of these two Section 4(f) resources. The temporary occupancies would not interfere with the protected activities, features or attributes of the recreational resources in the long term. The Bureau of Reclamation and Salt River Project own and operate the Arizona Canal and the land in which the Sun Circle Trail and the Arizona Canal Trail are located and are the agencies with jurisdiction. The SRP concurred with the *de minimis* impact finding and that the temporary occupancy of the trails did not result in a use of the resource on October 23, 2018 (Attachment B). The Bureau of Reclamation did not provide any comments and did not provide any objections.

The Project would result in the conversion of the historic Western Savings and Loan Branch Bank (currently the Souper Salad restaurant) into part of the transit center. The permanent incorporation of this property into a transportation use is considered a direct use under Section 4(f). On October 22, 2018, SHPO concurred with the finding of no adverse effect to historic properties under Section 106. Based on the finding of no adverse effect to historic properties under Section 106, FTA has determined that the direct use of the Western Savings and Loan Branch Bank would result in a *de minimis* impact, consistent with 23 CFR 774.17(5).

The Project would not have proximity impacts on an adjacent or near-by Section 4(f) property, after incorporation of mitigation measures, that are so severe that the activities, features, or attributes that qualify the property for protection under Section 4(f) are substantially impaired or diminished. The Project would not change the existing urban visual character in proximity of a Section 4(f) resource and thus, the Project would not substantially impair the aesthetic features or attributes of a Section 4(f) resource. The Project would have no adverse effect to historic properties under Section 106. No noise and vibration impacts were identified at any Section 4(f) resource. The utility and access to the Section 4(f) properties would be maintained and/or improved. Therefore, pursuant to 23 CFR 775.15(f), FTA finds that the Project would not result in constructive use of any Section 4(f) property.

#### Section 6(f) of the Land and Water Conservation Fund (LWCF) Act.

Section 6(f), administered by the Interagency Committee for Outdoor Recreation and the Department of the Interior's National Park Service, pertains to projects that would cause impacts on, or the permanent conversion of, outdoor recreational property acquired with LWCF assistance. The Rose Mofford Sports Complex has received LWCF monies and is, therefore, considered a Section 6(f) resource. The Project would modify the sports complex's parking lot, landscaped areas and sidewalks, but these impacts are not considered conversion to another use under Section 6(f) because the parking for recreational users would not be restricted; rather, more parking would be added or shared and access to recreational amenities would continue. Therefore, FTA has determined that the Project would not result in a conversion of the Rose Mofford Sports Complex, consistent with Section 6(f). The National Park Service concurred with FTA's determination on January 5, 2018 (See Appendix G of the EA).

### Parking

As discussed in Section 3.6.3.2 in the EA, the Project would remove approximately 435 off-street parking spaces in six locations along the Project alignment, most of which would occur at the Metrocenter park-and-ride (386 spaces). In all cases except at Dunlap and 25th Avenue, the loss of parking would not be an adverse impact because the remaining parking would be sufficient, based on City of Phoenix parking requirements. The parking associated with the property on Dunlap Road east of 25th Avenue would be reconfigured to replace all but three parking spaces, resulting in no adverse effect.

### Noise and Vibration

Potential noise impacts from the Project were assessed using noise assessment criteria outlined in FTA's *Transit Noise and Vibration Impact Assessment* (2006). Noise modeling indicated that noise generated by the Project, including traction power substations, would result in moderate impacts at two locations: the San Valiente Apartments and the Acclaim Apartments. The noise level at the San Valiente Apartments would be less than 1 decibel (dB) above the moderate impact level. A less than a 1 dB exceedance of the moderate impact level is negligible, given that a 3 dB change is considered the threshold at which an average listener can detect a change in the noise levels. The noise levels at the Acclaim Apartments would be slightly more than 1 dB (1.2 dB) above FTA's threshold for moderate impact, and the impact is attributable to train bells in the vicinity. Where train bells at stations or crossings cause a 1 dB exceedance, the bells are safety-related and are already at a low-level setting. Therefore, the Project would not result in adverse noise impacts and no mitigation is proposed.

The Project would exceed FTA's vibration impact criteria at one location, the San Valiente Apartments. With implementation of mitigation measures identified in Section 3.8.4 of the EA, the vibration impacts would be reduced to below the FTA's vibration impact criteria and the Project would have no adverse vibration impacts.

### Executive Order 11988: Floodplain Management

Portions of the Project are within the 100-year floodplain associated with the ACDC. The new bridges would span the ACDC and would not modify the ACDC or change the 100-year floodplain or base floodplain elevations; therefore, the Build Alternative would have no impact on the 100-year floodplain. The Project is in an area already developed with impervious surfaces with well-developed drainage infrastructure. It would not increase the risk of flooding. Therefore, FTA finds there would be no significant impact related to floodplains from the Project.

### Clean Water Act and Rivers and Harbors Act

As discussed in Section 3.17 of the EA and pursuant to Section 404 of the Clean Water Act of 1972 (33 U.S.C 1250 et seq. and 40 CFR 230), the Project was evaluated for impacts on waters of the United States (WOUS) under the jurisdiction of the U.S. Army Corps of Engineers. The Project would cross the ACDC, a WOUS, at 25th Avenue. ACDC is not a navigable water as its function is for storm water conveyance. The new bridges on 25th Avenue would span the ACDC, and no temporary or permanent fill would be placed within the channel; therefore, the Project would have no impact on WOUS or navigable waters.

## Endangered Species Act

The Project does not contain suitable habitat for any threatened or endangered species; therefore, FTA finds that the Project would not result in any impacts to federally listed threatened or endangered species. Birds protected by the Migratory Bird Treaty Act likely inhabit the study area and potentially nest in landscaped trees along the Build Alternative route. Some displacement of these species and their nests could occur because of a temporary loss of habitat (i.e., tree trimming/removal) and increased activity in the area during construction. With the implementation of mitigation measures as identified in Section 3.19.4 of the EA, these potential impacts would be minimized. The Project would have no adverse effect to threatened or endangered species.

## Executive Order 12898: Environmental Justice

The potential for disproportionately high and adverse human health or environmental effects on minority and low-income populations was evaluated in the EA in accordance with Executive Order 12898, U.S. Department of Transportation Order 5610.2(a) and FTA's Environmental Justice Circular 4703.1. The Project alignment crosses areas that are predominantly populated with minority and/or low-income persons, but both environmental justice (EJ) and non-EJ populations are present within the Project's effective service area.

As discussed in Section 3.14.2 of the EA, after the implementation of avoidance, minimization, and/or mitigation measures, the Project would have no adverse effects for construction and operation in all environmental topic areas except transportation. These topic areas include but are not limited to air quality, traffic, community impacts, noise and vibration, visual impacts and land use. Therefore, the Project would have no disproportionately high and adverse effects to EJ populations related to these topic areas.

The Project would not displace any residential properties, but would require relocation of three businesses for the end-of-line station and transit center. These businesses are not considered central to the community and impacts to these businesses would be mitigated as identified in Section 3.14.2 of the EA. The relocation of the transit center near Metrocenter would occur in an area with a high concentration of EJ populations. However, existing Valley Metro bus routes is available to transport people to the relocated transit center and maintain connectivity with transit services. No adverse effect related to displacements, right of way acquisition or transit service is expected. Therefore, the Project effects would not result in disproportionately high and adverse effects to EJ populations.

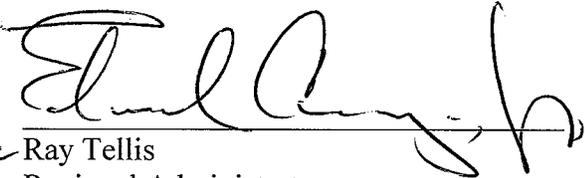
Construction impacts (noise and vibration, air quality, and traffic) would be disproportionately borne by EJ populations; however, majority of the construction activities would occur in areas with no residences. The heaviest construction activity, including the construction of the end-of-line elevated passenger station at Metrocenter, transit center, and park-and-ride facilities, would not directly affect residential areas. Project impacts were compared to Valley Metro's Central Mesa Light Rail Extension (CME) project. For the CME, the temporary construction impacts and associated mitigation measures affected populations within environmental justice and nonenvironmental justice areas. Mitigation measures for the Project would be applied similarly in both EJ and non-EJ communities. Therefore, the Project effects would not result in disproportionately high and adverse effects to EJ populations.

In addition, the EJ communities along the Project corridor would also be the most proximate to the benefits of the project. The benefits include increased transit accessibility as well as improved

traffic circulation, air quality, connectivity to activity and employment centers, and travel times between neighborhoods and businesses within the study area. These transit access and mobility enhancements in EJ communities are considered offsetting benefits. Taking impacts and offsetting benefits into consideration, FTA finds that the Project would not have disproportionately high and adverse human health or environmental effects on minority and/or low-income populations.

### **Environmental Finding**

In accordance with 23 CFR 771.121, FTA finds, based on the analysis, reviews, concurrence letters from applicable resource agencies and mitigation measures described in the EA, that no significant adverse impacts on the environment would result from implementation of the Project and an Environmental Impact Statement is not required. Valley Metro shall implement the mitigation measures and measures to avoid and minimize environmental impacts as listed in Table ES-2 in the Executive Summary and as discussed in Chapter 3.0 of the EA.

  
For Ray Tellis  
Regional Administrator  
Federal Transit Administration, Region IX

Date: 2/5/2019

### **Attachments**

Attachment A: Comments received on the Environmental Assessment and responses to comments

Attachment B: Relevant Correspondence

- Letter from SHPO regarding concurrence on the determination of eligibility for the National Register of Historic Places (July 10, 2017)
- Letter from SHPO regarding concurrence with FTA's finding of no adverse effect on historic resources under Section 106 (October 22, 2018)
- Letter from City of Phoenix Parks and Recreation Department concurring with FTA's determination of *de minimis* impacts to Rose Mofford Sports Complex under Section 4(f) (October 26, 2018)
- E-mail from the Salt River Project, concurring with FTA's determination of *de minimis* impacts to the Arizona Canal Trail and the Sun Circle Trail under Section 4(f) (October 23, 2018)

Attachment A

Comments Received on the Environmental Assessment and Responses to Comments

**NORTHWEST PHASE II LIGHT RAIL EXTENSION PROJECT  
PUBLIC COMMENTS ON THE ENVIRONMENTAL ASSESSMENT**

Valley Metro, in coordination with the FTA, prepared an Environmental Assessment (EA) for the Northwest Phase II Light Rail Extension Project (Project) that evaluated the environmental features and potential impacts on the environment related to the construction and operation of the proposed light rail extension from Dunlap/19th Avenue to Metrocenter Mall . In September 2018, FTA approved the EA for public circulation and comment. Valley Metro and the City of Phoenix initiated a 30-day public review and comment period (September 20 through October 22, 2018) and held a public meeting on October 4, 2018. The EA was available in print and electronically at Cholla Library and the Valley Metro Office and was available for download from Valley Metro’s website: <http://www.Valleymetro.org/northwest2>. The EA will remain on Valley Metro’s website through the duration of the Project.

Valley Metro received 14 comments at the Project’s public meeting, one by electronic submittal, and one written letter. The comments that Valley Metro received do not require any revisions to the EA. Several comments were received pertaining to support for the project, suggestions for safety and security measures, station design, bicycle and pedestrian connections, the elevated end of line station, and concerns for small businesses. The table below provides a response to each comment received. The personal information for the commenters has been redacted.

**TABLE 1: COMMENTS RECEIVED ON THE EA AND RESPONSES TO COMMENTS**

No.	Commenter	Comment	Valley Metro Response to Comment
<b>Community Comments</b>			
<b>Written or Court Reporter Comments at Public Meeting on October 4, 2018</b>			
1	Stan Bates	100% in favor of light rail, but it should have been completed 20 years ago. My biggest issue deals with security and safety on the trains and stations. It must improve significantly with better trained security with at least limited post certification to arrest those who are sleeping on site, using drugs/alcohol, and those panhandlers that impact rider’s willingness to use the system. More cameras are needed for security as well. <u>Do not</u> allow the concept of moving the problem from one area like 19th North to Metrocenter. Deal with the problems rather than make everyone else to solve them for you!	Valley Metro uses contract security officers to provide security and fare inspection services at all light rail stations, park-and-rides, transit centers and trains. Security officers enforce Valley Metro’s code on conduct, conduct fare inspections, enforce civil code compliance, assist passengers through effective customer service and provide system-route information. The train operators and security personnel would be trained to spot potentially suspicious activities and to take appropriate action. The security staff are complemented by sworn police officers functioning in each city who handle the law enforcement response to criminal issues. Valley Metro is committed to training the security officers and other security measures in the design of our stations (See Section 3.16.3.1 <i>Security Protection Safety Services</i> in the EA). Although the security officers do not have arrest authority, they have radio communication with the Phoenix Police Department (PD) and are able to request a

			<p>priority police response as needed and support the PD. Valley Metro has a strong partnership with the Phoenix PD, particularly the Transit Enforcement Unit. Valley Metro regularly works with the Phoenix PD to conduct fare enforcement sweeps at train platforms throughout the city of Phoenix. Phoenix PD has also increased their presence along the light rail. They have enacted an “extra duty” program for officers to work the light rail, outside of their normal duties and have developed a Violence Impact Project that is designed to address the root cause of incidence of violence in Phoenix. The light rail has been and will continue to be part of the area of emphasis for the PD’s Violence Impact Project.</p> <p>Valley Metro also works very closely with the City of Phoenix Neighborhood Services Division. Valley Metro consistently calls the Community Action Response Engagement Services outreach teams to respond to the light rail platforms to assist those who may be homeless or are otherwise in need of social services or neighborhood assistance. Additionally, Valley Metro has created a “Respect the Ride” program that increases our commitment to prevent non-public transit users from loitering on Valley Metro property. Security officers work with the Phoenix Police Department to have non-transit persons removed from the light rail platforms and trains if they don’t have valid transit fare.</p> <p>The design criteria for Valley Metro projects require that light rail stations be designed in accordance with Crime Prevention through Environmental Design guidelines. Also, the light rail vehicles, transit center, park-and-rides and stations would be designed in accordance with the Americans with Disabilities Act. CCTV would be provided at the station platforms, ticket vending machines and park-and-ride facilities. The stations, transit center and park-and-rides would have emergency call boxes that would connect to Valley Metro’s Operations Control Center, which would have direct communication with the City of Phoenix police and fire departments. The U.S. Department of Homeland Security also requires all such facilities to install U.S. Department of Homeland Security-compliant trash cans that are either resistant to explosives or that use an open metal frame and clear bag. For additional information please see Section 3.16 <i>Safety and Security</i> Measures in the EA.</p>
2	Ruthanna Battilana	1. Put in a scramble walk signal at Montebello/19 <sup>th</sup> Avenue. Cars turning while trying to cross from	Thank you for your comments. Although your comments are not specific to the Northwest Phase II Light Rail Extension Project

	<p>rail to parking lot.</p> <ol style="list-style-type: none"> <li>2. More barriers along rails to prevent jay walking across tracks (I see it more and more jay walkers).</li> <li>3. It may be too late but...what about 1 track on S. Central looping around to 7th Street and eventually alternating with a loop to 7th Avenue.</li> <li>4. The artwork at Dunlap looks like vacuum connections – minus the hoses-for the carwash!</li> </ol>	<p>Valley Metro has provided the following responses:</p> <ol style="list-style-type: none"> <li>1. This comment is specific to the Montebello and 19th Avenue intersection which is part of the Valley Metro light rail system, but is outside the Northwest Phase II Light Rail Extension Project. Therefore, this comment is not related to this Project. <p>The intersection at Montebello and 19th Avenue is too wide to efficiently accommodate a pedestrian scramble (a type of traffic signal movement that stops all vehicular traffic allowing pedestrians to cross an intersection at every direction). A pedestrian scramble allows pedestrians to cross the intersection diagonally. Pedestrian scrambles are used when there is a substantial number of pedestrians crossing the street, a condition that does not occur at this location. Therefore, the perceived benefit is offset by the impacts in traffic (travel delays) resulting in all traffic stopping to allow pedestrians to cross the intersection.</p> </li> <li>2. This comment is related to the Project as pedestrians crossing the tracks outside designated areas applies to the entire rail system. <p>Valley Metro design standards require certain features to discourage pedestrians from illegally crossing the tracks and to enhance safety at permitted crossing locations. These features include, but are not limited to, pedestrian signals, lighting and well-marked crosswalks, which would be provided at all crossing locations. Signs would be installed identifying the guideway as a no trespassing zone. The station platforms would be marked with “Do Not Cross Tracks,” and signs to direct pedestrians to the proper crossing location would be incorporated into the Build Alternative design. The station platforms would also have appropriate signs for paid fare zones and demarcation painting/elements to clearly identify the station perimeter. Pedestrians have a responsibility to obey the laws and avoid jaywalking. For additional information, please see Section 3.16, <i>Safety and Security Measures</i> in the EA.</p> </li> <li>3. This comment does not relate to the Northwest Phase II Light Rail Extension Project as this comment is directly related to the South Central Light Rail Extension Project. <p>The comment period for the South Central Light Rail</p> </li> </ol>
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			<p>Project closed on June 13, 2016. While this specific alternative was not evaluated Valley Metro and the City of Phoenix evaluated several alignment alternatives that included going down a portion of 7th Street and 7th Avenue. Both 7th Street and 7th Avenue were eliminated in part because the bridges over the railroad were insufficient to handle the load of light rail vehicles and would need to be replaced at a significant cost and impacts to traffic during construction. In addition, the alignments on 7th Street and 7th Avenue would result in circuitous routing to downtown and result in possible transfers instead of a single seat ride and did not have community support. Refer to Chapter 2 of the South Central Light Rail Extension Project EA).</p> <p>4. Thank you for your comment on the artwork at Dunlap.</p>
3	Rod Fowble – College America	<p>College America is really excited to see this extension of the rail come to life. We believe the rail will help in revitalizing the Metrocenter area. We are also glad that it will help a lot of our students, who have transportation issues, get to our campus more timely and effectively. We look forward to see it. Finish in 2023 and are fully supportive of its development.</p>	<p>Thank you for your comment and for your support of this project.</p>
4	Joseph Carzo	<p>I am the owner of the Outback Steakhouse. I would like to set up a private meeting with the extension team. We (regional manager, Kristine Hogan, President of Outback, Steve Wiegler and V.P. Steve Maulbaum) would like to discuss our concerns for our business.</p>	<p>No adverse impacts to the Outback Steakhouse have been identified. The project team has met with Outback Steakhouse on two occasions, (see Chapter 4 of the EA), but are happy to continue discussing any new concerns or any you feel are unresolved. The project team will work with Outback to set up a meeting and discuss those concerns.</p>
5	Michael Wainscott	<p>Don't let the fear of change stop innovation!! We are moving onward and upward, so shit or get off the pot!!</p>	<p>Thank you for your comment.</p>
6	Leo Ranou	<ol style="list-style-type: none"> <li>1. Is the parking area secure</li> <li>2. Where is the bus stop going</li> </ol>	<ol style="list-style-type: none"> <li>1. The design criteria for Valley Metro projects require that light rail stations be designed in accordance with Crime Prevention through Environmental Design guidelines. The park-and-ride lots will have lighting, closed-circuit television cameras, and emergency call boxes that would connect to Valley Metro's Operations Control Center, which would have direct communication with the City of Phoenix police and fire departments. For additional information please see Section 3.16 <i>Safety and Security Measures</i> in the EA.</li> <li>2. The bus stops along Dunlap Avenue will remain at the same locations as they do today. The existing bus transit center</li> </ol>

			<p>located in the southwest corner of the mall will be relocated adjacent to the Metrocenter light rail station and park-and-ride lot. (See Section 2.2.2.5, Transit Center/Park-and-ride in the EA). There are currently four local bus routes and one RAPID bus route that services the existing transit center (See Figure 2-15, <i>No-Build Alternative Transit Network</i> in the EA). Once the transit center is relocated, route 35 would continue to stop at the existing transit center (See Figure 2-21: <i>Build Alternative Transit Network</i>, in the EA). Passengers of the other bus routes can catch the route 35 bus and transfer to their bus at the new transit center. As the project continues to move forward the City of Phoenix and Valley Metro will reevaluate how the buses circulate within Metrocenter. For additional information on how the buses will work and the transit center see the <i>Transportation</i> subsection under Section 3.14.2.2</p>
7	Lynn Eide	I support light rail coming to Metrocenter. It is frustrating that it is taking so long as I feel the delay is holding up the repurposing of Metrocenter Mall.	<p>Thank you for your comment and for supporting the project. Valley Metro and the City of Phoenix are coordinating with the Federal Transit Administration to move this project forward. Valley Metro is also coordinating with Metrocenter Mall on the design of this Project, specifically the end-of-line station and transit center. The redevelopment of the Metrocenter Mall is separate and independent of this Project as are the schedules for both projects. This extension is scheduled to open in late 2023.</p>
8	Cynthia Malick	I strongly support light rail, however, there should be no elevated trains through residential neighborhoods, not just aesthetically or for privacy, but ultimately safety of the neighborhood.	<p>The elevated portion of the alignment begins on Mountain View Road just west of 25th Avenue and will cross over I-17 and end just north of Cheryl Drive at Metrocenter. The elevated portion does not go through any residential neighborhoods. The nearest homes or apartments are located approximately one-half mile away and would not be effected by the elevated guideway. Figure 2-16 - <i>Build Alternative</i> in Chapter 2 of the EA shows the area of the alignment that is elevated and Figure 3-26 – <i>Residential Land Use and Property Acquisition in the Study Area</i> in Chapter 3 of the EA shows where residential land uses are relative to the Build Alternative.</p>
9	Robert Gutierrez	I am in favor of this project. I believe it will be an asset that will help revitalize Metrocenter. Add bike facilities for the Arizona canal to promote bike ridership and light rail.	<p>Thank you for your comment and for supporting the project. The Arizona Canal and the Arizona Canal Diversion Channel currently have multi-use pathways (including bicycles) that cross 25th Avenue (See Figure 3-4 <i>Bicycle and Multiuse Facilities</i> in Chapter 3 of the EA). This project will install signals at both crossings to provide a safer crossing of 25th Avenue. 25th Avenue has an existing bike lane that will be maintained. The 25th Avenue bike lane connects to the multi-use paths along the</p>

			canals, providing a connection to the light rail station just north of the canals. Please see Section 3.6.3.3 <i>Pedestrians and Bicyclists</i> in the EA
10	Elizabeth Van Zee	Please provide better rain and sun protection for folks waiting for light rail cars.	Providing shelter from the elements is important to Valley Metro and defined in Valley Metro’s Urban Design Guidelines and Light Rail Transit Design Criteria Manual. Valley Metro’s standard light rail station design was developed in a manner to provide the relief from direct sunlight during the summer months and minimize the effect of heat retention. Refinements to station design will occur during final design of the Project.
11	Max McQueen	<p>What measures are being taken to ensure the Metrocenter station does not become grand central station for homeless.</p> <p>Very concerned for small mom and pop businesses along the construction route. My experience is that many will not survive the long construction. The city’s efforts to help affected businesses are woefully inadequate.</p>	<p>The City of Phoenix Neighborhood Services Division has increased its resources for the homeless and shelter less by creating the Community Action Response Engagement Services (C.A.R.E.S.) teams. Valley Metro works closely with C.A.R.E.S. outreach teams along the light rail corridor to encourage people on the street to accept services and resources that will assist to end their homelessness. Valley Metro has also created a “Respect the Ride” program that increases our commitment to prevent non-public transit users from loitering on Valley Metro property. Valley Metro works with the Phoenix Police Department to have non-transit persons removed from the light rail platforms and trains if they don’t have valid transit fare. Please refer to the first comment/response above for additional information on safety and security.</p> <p>There are many factors that contribute to how businesses perform during construction periods, such as the health of the business prior to construction and general strength of the local and national economy. Valley Metro and the City of Phoenix will implement a custom business assistance program designed to serve the specific business within this community throughout construction. The business assistance program will include:</p> <ul style="list-style-type: none"> <li>• Special events</li> <li>• Customized signage</li> <li>• Marketing/social media assistance</li> <li>• Accounting/financial planning</li> </ul>
12	Beth Nicholson	I am concerned with the station that will be at Rose Mofford Park. People will be able to move freely and use the park for activities other than what it was intended for. I am asking for “LOTS” more lighting and fencing to try and keep everyone safe. Regular or more than the regular patrol of the park as a whole would give a little relief on the fear of safety.	The platform and park and ride at Rose Mofford Park will have lighting consistent with what is in existence at platforms and park and rides throughout the light rail system. Platforms and park and rides are well lit and are designed to have clear lines of sight and a high level of visibility. (See Section 3.16.3.1 <i>Security Protection Safety Services</i> in the EA). There will be more lighting at the shared parking area than what occurs there today.

		Walking through the park now can be scary, but with the light rail, things will only get worse.	<p>Valley Metro will work closely with the Phoenix Police Department precinct officers and the Transit Enforcement Unit during the planning and eventual opening of Northwest Extension Phase II.</p> <p>Phoenix PD currently maintains a strong presence in the area surrounding Rose Mofford Park and will monitor the activity at the park once the light rail begins operation. Valley Metro has also created a “Respect the Ride” program that increases our commitment to prevent non-public transit users from loitering on Valley Metro property. Valley Metro works with the Phoenix Police Department to have non-transit persons removed from the light rail platforms and trains if they don’t have valid transit fare. Please see the response to comment #1 and # 11 above for additional information regarding to safety and security.</p>
13	Bo Azemoun	Very much concerned about the effects of the proposed bridge on the visibility of our store signage. Even with being seventeen feet high I fear the structure will block most of our store signage. What can be done to ensure we do not lose our visibility from the freeway? Please advise. Also: to combat the loss of visibility of our building signage from the freeway, I would like to propose a tall enough monument sign that would advertise our business Pawn 1 <sup>st</sup> . Please contact me with regards to the possibility of this or any other solutions you may have for this potential problem for us. Thank you.	The visual effect to Pawn 1 <sup>st</sup> would be similar to the visual effect to the Western Savings and Loan Branch Building (see page 3-87 of the EA) as they are both located west of the I-17 frontage road and only separated by Cheryl Drive. The straddle bent or “open” piers associated with the elevated trackway would allow the buildings/signs to be seen through the openings between the piers and would not block the view entirely. Additionally, the view of the building would remain unobstructed from the I-17 frontage road and Metro Parkway. As project design progresses Valley Metro and the City of Phoenix will work with Pawn 1 <sup>st</sup> and will continue to assess the visibility of business signage.
14	Brenda Morgan	I just kind of really want the ticket area where the Souper Salad thing is-- would really like it to be really, really pretty. Maybe have an Indian influence. You know, like, Indian architects, some western things, but not just western. Some luscious trees and things too, because we don't have just cacti. I kind of want it to look like a really nice variety of we have trees, we have cacti, Indian influence, but I want some music too. Some soft music or some kind of music that is either classical or Indian. I like the Indian flute. Some kind of soothing music. You know, and just to make -- and I want any -- I'd like some nice seating and stuff like that, colorful, and just really beautiful. To show how we -- how Arizona is. And maybe a little cowboys, western, Indians, and things like that. Thank you.	Any alterations to the exterior of the Western Savings and Loan Branch Bank, currently the Souper Salad, must be made in a manner that is sensitive to the historic character-defining features of the building, so that the property can maintain its historic integrity and ability to convey its historic significance. Valley Metro will coordinate with the City of Phoenix Historic Preservation Office as well as with the State Historic Preservation Office with design elements of the transit center and the station. Valley Metro will convey your ideas to the design team members for consideration.

On-Line			
1	Aaron Mertz	We wholeheartedly support this project, resulting in an end-of-line at Metrocenter that makes more sense than the current Dunlap end-of-line. The Metrocenter terminus will hopefully be a boon to economic development in that area. We hope the project is able to move quickly and finish on (or even ahead of) time.	Thank you for your comment and for supporting the project.
Letter			
1	Hopi Tribe	<p>In a Letter to the FTA dated February 27, 2017, the Hopi Cultural Preservation Office reiterated we are interested in consulting on any proposal in Arizona that has the potential to adversely affect prehistoric sites, and we have consulted on other Valley Metro Projects. We have now reviewed the enclosed environmental assessment and understand a literature review and record searches were conducted and no known archaeological sites were recorded within the area of potential effect, described as a developed urban setting. We also understand most of the area has not been previously surveyed for cultural resources nor is a survey possible, given the lack of surface exposures.</p> <p>Therefore, we appreciate that if any cultural features or deposits are encountered during project activities, these activities will be discounted in the immediate area of the remains, and the State Historic Preservation Office will be consulted to evaluate their nature and significance, and if any Native American human remains or funerary objects are discovered during construction they will be immediately reported as required by law.</p>	<p>We thank the Hopi Tribe for their review of the environmental document and for their comment.</p> <p>Valley Metro has included a measures to avoid and minimize effects to historic resources in the environmental document (See Section 3.10.4 of the EA). There are two particular measures included in the EA that address this comment. The first is that all work will be halted immediately when any unanticipated buried resources are discovered and that SHPO will be consulted. The second addresses the process of notifying the Arizona State Museum, SHPO, the City of Phoenix Archaeologist, and the claimant Native American Tribe(s) for consultation and treatment of any human remains.</p>

Attachment B  
Relevant Correspondence



U.S. Department  
of Transportation  
**Federal Transit  
Administration**

**SHPO - 2014** 0059 (137731)  
ARIZONA STATE HISTORIC PRESERVATION OFFICE

REC'D  
JUL 17 2017

REGION IX  
Arizona, California,  
Hawaii, Nevada, Guam  
American Samoa,  
Northern Mariana Islands

90 Seventh Street  
Suite 15-300  
San Francisco, CA 94103-6701  
(415) 734-9490  
(415) 734-9489 (fax)

Kathryn Leonard  
State Historic Preservation Office  
1100 W. Washington Street  
Phoenix, AZ 85007  
Attention: David Jacobs, Compliance Specialist

RECEIVED  
JUL 3 2017  
ARIZONA STATE HISTORIC  
PRESERVATION OFFICE

JUN 29 2017

Re: Northwest Phase II Project, Phoenix, AZ  
Area of Potential Effect and Eligibility Determination

Dear Ms. Leonard:

Valley Metro in coordination with the City of Phoenix proposes to construct the Northwest Phase II Extension Project (Project) in Phoenix, Arizona. The Project will be a federal undertaking because the Federal Transit Administration (FTA) will be providing financial assistance. This letter initiates consultation with the State Historic Preservation Officer pursuant to Section 106 of the National Historic Preservation Act as amended (36 C.F.R. 800). The FTA is requesting concurrence on the definition of the Area of Potential Effect (APE) and determinations of eligibility for the National Register of Historic Places (NRHP).

**Project Description**

The project is in northern Phoenix, in Maricopa County. The project originates at the existing end-of-line station and park-and-ride lot located on the southwestern corner of 19th and Dunlap Avenues. The Build Alternative alignment continues west along 19th Avenue to 25th Avenue, then extending north on 25<sup>th</sup> Avenue, crossing the Arizona Canal and Arizona Canal Diversion Channel to Mountain View Road. Following the general alignment of Mountain View Road, the trackway crosses I-17 using an aerial structure over the freeway. Once on the western side of the freeway, the trackway would turn north and continue on an aerial structure above the southbound I-17 frontage road for a short distance terminating at an aerial station near Cheryl Drive within Metrocenter. The proposed project also includes relocating the existing transit center from the southwest quadrant of Metrocenter to adjacent to the proposed end-of-line Metrocenter aerial light rail station. Also included are two proposed park-and-ride lots. One would be located on the western side of Metro Parkway north of Cheryl Drive, and the second includes a shared park-and-ride lot at the Rose Mofford Sports Complex on the eastern side of 25th Avenue near Mountain View Road.

**Identification of Area of Potential Effect**

The APE includes properties that may be directly impacted (e.g., physical destruction or disturbance of any or all of the property either by the built project or during construction activities), as well as properties that may be indirectly impacted (e.g., through visual or audible impacts, changes in traffic circulation, or other effects to the environment that would diminish the integrity of a property's surroundings) by project activities. The APE map may be found on page 9 of the Cultural Resources Inventory and Evaluation Report.

The APE includes street right-of-way (ROW) along the proposed alignment of the light rail route. For architectural resources, the APE is generally defined as also including the parcels of land, as defined by the Maricopa County Assessor, immediately adjacent (first tier of properties) to the proposed alignment of the light rail route for the consideration of indirect effects. The APE also includes parcels of land adjacent or near the light rail alignment for staging areas, traction power substations (TPSSs), signal buildings, a transit center, and park-and-ride facilities. For potentially affected parcels of a potential historic district, or group of associated buildings (for example, Metrocenter or a mobile home park), the entire potential district or group complex boundary was included within the APE.

For archaeological resources, the proposed APE includes the proposed right-of-way and any areas of direct ground disturbance during project construction, including areas for staging and temporary construction activities. Because ground-disturbing activities vary along the alignment to accommodate the different project elements the vertical APE varies. The vertical APE for the bridge over I-17 and the aerial station would be approximately 60-80 feet for the pier locations. The vertical APE along the remainder of the alignment would range from 2-8 feet for the guideway and 15-20 feet for the overhead contact system poles that are spaced approximately 100-120 feet apart.

In accordance with 36 CFR §800.4, the FTA is requesting your concurrence with the APE.

### Survey Results

The historic building inventory was performed June 15, 2016. The archaeological survey was performed on August 5, 2016. A records review of cultural resources and past projects within the APE was conducted.

**Historic Resources Summary Table**

<b>Inventory #</b>	<b>Property Name</b>	<b>Address</b>	<b>Type, (Date Built)</b>	<b>Eligibility Status</b>
ACS-1	Metrocenter Mall	9617 N. MetroPkwy	Mall (1973)	<u>Recommended not eligible</u> : Loss of integrity due to insensitive alterations, building demolition, alterations to the plan and design of the original building
ACS-2	Sears, Roebuck & Co. Auto Center	9803 N. Metro Pkwy	Building (1973)	<u>Recommended not eligible</u> : : No contiguous district; not individually significant for planning/ development or architectural design
ACS-3	Western Savings and Loan Branch Bank	10005 N. Metro Pkwy	Building (1975)	<u>Recommended eligible</u> under Criteria A and C: Constructed in 1975 and eligible for its Neo-Expressive architecture, a rare extant architectural type in Phoenix and for its association with Branch Banks in Phoenix.
ACS-4	Broadway Stateman's Club (Auto Club)	9600 N. Metro Pkwy	Building (1973)	<u>Recommended not eligible</u> : Building has been demolished
ACS-5	Royal Palm Mobile Home Park	2050 W. Dunlap Ave.	Building (1969)	<u>Recommended eligible</u> under Criterion A for its association with designed mobile home parks in north Phoenix
HDR-1	Arizona Canal	No address	Canal (1893-1895)	<u>Previously Determined Eligible</u> under Criteria A and C as part of the SRP canal system in Arizona

### Other Consultation Efforts

Valley Metro, in conjunction with FTA, is preparing an Environment Assessment (EA) for the Project pursuant to the National Environmental Policy Act. The EA is evaluating the Build Alternative (LPA) and No-Build Alternative. In conjunction with preparing the EA, potential effects of the project on properties listed in or eligible for the National Register of Historic Places are being considered in accordance with Section 106 of the National Historic Preservation Act. Potential uses of historic resources also are being evaluated pursuant to Section 4(f) of the U.S. Department of Transportation Act of 1966 (49 USC § 303).

FTA and Valley Metro will be sharing results of the cultural resources studies with the consulting parties and Native American groups as the project continues. A summary of outreach efforts and comments from consulting parties and Native American groups may be found in Section 4.5 (starting on page 23) and Appendix A of the Cultural Resources Inventory Report. The following parties were identified as having potential interest in the effect of the proposed undertaking on historic properties:

Phoenix City Historic Preservation Office  
Phoenix Archaeology Office  
Bureau of Reclamation  
Salt River Project  
Ak-Chin Indian Community  
Fort McDowell Yavapai Nation  
Gila River Indian Community

Hopi Tribe  
Pascua Yaqui Tribe  
Salt River Pima-Maricopa Indian Community  
White Mountain Apache Tribe  
Yavapai-Apache Nation  
Tonto Apache Tribe

If you are aware of any additional agencies, organizations, or individuals that could be interested in the effects of the proposed project on historic properties, please provide us with the appropriate contact information.

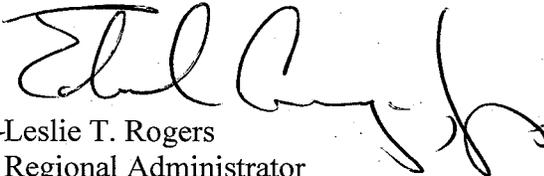
### *determination* Request for Concurrence

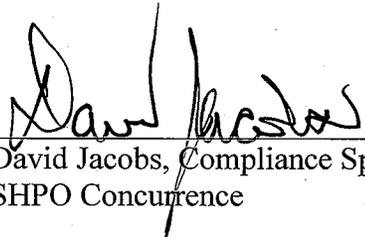
In accordance with 36 CFR § 800.4, the FTA is requesting your concurrence with the revised APE and with finding that the properties listed above are eligible for the NRHP, which you can indicate by signing below, or by providing us your comments. We would appreciate receiving your comments within 30 days of the date of this letter.

The Cultural Resources Inventory and Evaluation Report is enclosed for your review. The report provides the additional information on the APE, surveys conducted, historic properties evaluation, and consultations with Native American Groups and others. The report also includes a preliminary finding of effect upon which you may comment; however, the finding of effect is expected to be submitted to your office following the public review of the EA in an effort to involve the public in accordance with 36 CFR § 800(a)(4) and 36 CFR § 800.8.

Please contact Dominique M. Paukowits, Acting Director of Planning and Program Development, at (415) 734-9469, or dominique.paukowits@dot.gov if you have any questions.

Sincerely,

  
For Leslie T. Rogers  
Regional Administrator

  
David Jacobs, Compliance Specialist  
SHPO Concurrence

10 JULY 17  
Date

Attachments: Cultural Resources Inventory and Evaluation Report

SHPO - 2014 - 0059 (145542)  
 ARIZONA STATE HISTORIC PRESERVATION OFFICE



U.S. Department  
 of Transportation  
**Federal Transit  
 Administration**

REGION IX  
 Arizona, California,  
 Hawaii, Nevada, Guam  
 American Samoa,  
 Northern Mariana Islands

90 Seventh Street  
 Suite 15-300  
 San Francisco, CA 94103-6701  
 415-734-9490  
 415-734-9489 (fax)

Ms. Kathryn Leonard  
 State Historic Preservation Officer  
 Arizona State Parks  
 1100 West Washington  
 Phoenix, Arizona 85007

OCT 22 2018

Re: Northwest Phase II Light Rail Extension  
 Finding of Effect and Notification of  
 Section 4(f) De Minimis Determination  
 SHPO-2014-0059

Dear Ms. Leonard:

The Federal Transit Administration (FTA), in consultation with Valley Metro and the City of Phoenix, is continuing its consultation with the State Historic Preservation Office (SHPO) under Section 106 of the National Historic Preservation Act (NHPA), as amended (36 Code of Federal Regulations [CFR] 800), for the Northwest Phase II Light Rail Extension Project (Project) in Phoenix, Arizona. This letter requests your concurrence on the finding of effect per 36 CFR 800.5. This letter also serves to notify you of determinations under Section 4(f) of the U.S. Department of Transportation Act of 1966, as amended (49 USC 303).

### **Project Description**

The Build Alternative would consist of an approximately 1.5-mile-long extension from its current terminus at Dunlap and 19th Avenues to Metrocenter on the western side of Interstate 17 (I-17). The alignment would travel west along Dunlap Avenue from 19th Avenue to 25th Avenue, where it would turn north and continue along 25th Avenue, crossing the Arizona Canal and Arizona Canal Diversion Channel and then continuing north to Mountain View Road where it would turn west. At Mountain View Road just west of 25th Avenue, the alignment would begin transitioning to an aerial structure and cross I-17 on a new bridge. On the western side of I-17, the alignment would proceed north and terminate at an elevated station north of Cheryl Drive within Metrocenter. The Metrocenter Transit Center, currently in the southwestern quadrant of Metrocenter, would be relocated adjacent to the proposed Metrocenter light rail station. In addition to the Metrocenter station, the Project would include two additional stations, on Dunlap Avenue east of 25th Avenue and on 25th Avenue south of Mountain View Road. Two park-and-rides are also proposed: one at Rose Mofford Sports Complex and another at Metrocenter.

### **Public Participation**

The Environmental Assessment (EA) was circulated for public and agency review and comment from September 20, 2018, through October 22, 2018. In addition, the EA and all the appendices including the Cultural Resources Inventory and Evaluation Report were attached to the EA. A public meeting was held on October 4, 2018, to solicit input on the EA and cultural resources. Valley Metro also sent the EA and appendices to the following Native American Tribes, requesting their review of and comments on the EA and the Cultural Resources Inventory and Evaluation Report:

Ak-Chin Indian Community	Salt River Pima-Maricopa Indian
Fort McDowell Yavapai Nation	Community
Gila River Indian Community	Tohono O'odham Nation
Hopi Tribe	Tonto Apache Tribe
Pascua Yaqui Tribe	White Mountain Apache Tribe
	Yavapai-Apache Nation

Valley Metro received a letter from the Hopi Tribe indicating that should any cultural features or deposits be encountered during construction, then work should be stopped in the immediate area, the SHPO contacted and the remains assessed.

### **Historic Properties and Archaeological Sites**

Your office concurred with the delineation of the area of potential effects (APE) and determination of eligibility on July 10, 2017. No archaeological sites were identified within the APE. Three historic properties were identified within the APE:

- Western Savings and Loan Branch Bank, eligible under Criteria A and C for its Neo-Expressive architecture and association with branch banks in Phoenix
- Royal Palm Mobile Home Park, eligible under Criterion A for its association with designed mobile home parks in north Phoenix
- Arizona Canal, eligible under Criteria A and C as part of the Salt River Project canal system in Phoenix

The Build Alternative would require the acquisition of the Western Savings and Loan Branch Bank. This historic property will be repurposed as a portion of the relocated bus transit center located adjacent to the elevated Metrocenter light rail station. Use of the property is planned in a manner sensitive to the historic character-defining features of the building, and coordination will be maintained with the SHPO and the City of Phoenix Historic Preservation Office to ensure that the property retains its historic integrity and ability to convey its historic significance. Any alterations to the property would be done in accordance with the Secretary of the Interior's Rehabilitation Standards for the Treatment of Historic Properties [36 CFR 800.5(b)] to avoid an adverse effect for the Build Alternative.

To ensure long-term protection of the Western Savings and Loan Branch Bank and that the undertaking will have no direct adverse effect on the historic property, Valley Metro, in coordination with SHPO and the City of Phoenix, will execute a preservation covenant, or similar documentation, restricting future development of the property. In addition, Valley Metro would prepare a National

Register nomination for the Western Savings and Loan Branch Bank. With implementation of the above, the undertaking will not result in a direct adverse effect on the Western Savings and Loan Branch Bank.

The Project will require replacing the 25th Avenue bridges with wider structures spanning the Arizona Canal and the adjacent Arizona Canal Diversion Channel. It will not acquire, modify or demolish any portion of the Arizona Canal; therefore, the undertaking will not result in a direct adverse effect on that property.

Similarly, the Project is located within the street right-of-way adjacent to the Royal Mobile Home Park. The Project will not acquire, modify or demolish any portion of the Royal Mobile Home Park; therefore, the undertaking will not result in a direct adverse effect on that property.

**Section 106 Determination**

FTA has determined that a finding of “no adverse effect” is appropriate for the undertaking on the NRHP-eligible buildings and structures including the Western Savings and Loan Branch Bank where the FTA intends to make a *de minimis* impact determination under Section 4(f).

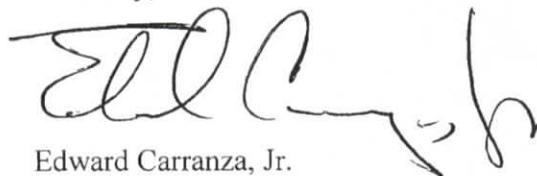
**Notification of Section 4(f) De Minimis Determination**

In addition to Section 106 of the NHPA, FTA must comply with Section 4(f) of the Department of Transportation Act, which is codified at both 49 United States Code (USC) 303 and 23 USC 138.

Consistent with 23 CFR 774.3(b), 23 CFR 774.5(b) and 23 CFR 774.17, FTA intends to make a *de minimis* impact determination for the acquisition of the Western Savings and Loan Branch Bank and are found to have no adverse effect under Section 106. Under those regulations, FTA can make a *de minimis* impact determination based on your written concurrence that the undertaking would have no adverse effect on this historic property under Section 106.

We would appreciate receiving your comments within 30 days of the date of this letter. Please contact Dominique M. Kraft, FTA Region 9 Community Planner, at (415) 734-9469, if you have any questions.

Sincerely,



Edward Carranza, Jr.  
Acting Regional Administrator

- NO ADVERSE EFFECT -

*Mary-ellen wahl 11/6/18*

ARIZONA STATE HISTORIC  
PRESERVATION OFFICE



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October 23, 2018

Inger Erickson  
Parks and Recreation Director  
City of Phoenix  
200 W. Washington Street, 16th Floor  
Phoenix, Arizona 85003

RE: Northwest Phase II Light Rail Extension Project  
De Minimis Impact Finding under Section 4(f)

Ms. Erickson:

The Federal Transit Administration (FTA), in coordination with Valley Metro and the City of Phoenix, is planning the Northwest Phase II Light Rail Extension Project (Project). The Project is 1.5 miles long, extending the existing Valley Metro light rail line from its current terminus at Dunlap and 19th Avenues to Metrocenter on the western side of Interstate 17 – refer to Figure 1. As part of the Project, two potential park-and-rides are proposed, one at the end-of-line adjacent to Metrocenter and the other co-located with Rose Mofford Sports Complex (RMSC) – refer to Figure 2 for the co-located park-and-ride. The purpose of this letter is to request the City of Phoenix's concurrence on a determination of a FTA's *de minimis* impact and temporary occupancy findings for RMSC.

The proposed Project would affect RMSC, a resource protected under Section 4(f) of the Department of Transportation Act of 1966 (49 United States Code § 303). Section 4(f) stipulates that FTA cannot approve the use of land from publicly owned parks and recreation areas, waterfowl and wildlife refuges, or public and private historical sites considered to have national, state or local significance unless there is no feasible and prudent avoidance alternative to the use of that land and the proposed action includes all possible planning to minimize harm to the property resulting from such use. A Section 4(f) resource "use," as defined in 23 Code of Federal Regulations (CFR) § 774.17, occurs:

- (1) When land is permanently incorporated into a transportation facility;
- (2) When there is a temporary occupancy of land that is adverse in terms of the statute's preservation purpose ...; or
- (3) When there is a constructive use of a Section 4(f) property ...

In August 2005, Section 4(f) was revised to simplify the process of approval of projects with minor, or *de minimis*, impacts (that is, direct use). As defined in 23 CFR 774.17(5), a *de minimis* impact on parks and recreation areas is one that would not adversely affect the features, attributes or activities qualifying the property for protection under Section 4(f). The requirements of Section 4(f) would be considered satisfied if it is determined that the project would have only a “*de minimis* impact” on the Section 4(f) resource. The provision allows avoidance, minimization and mitigation or enhancement measures to be considered in making a *de minimis* determination. Projects determined to result in a *de minimis* impact are not required to undergo an analysis of avoidance alternatives, and once the impact on the resource afforded protection under Section 4(f) is determined to be *de minimis*, the Section 4(f) evaluation process is complete.

### **Direct Use/De minimis Impact**

The City of Phoenix-owned RMSC is located on the east side of 25th Avenue and north of the Arizona Canal Diversion Channel and is adjacent to the east-side running light rail alignment. The Build Alternative shown in Figure 2 would add approximately 179 parking spaces to the RMSC. One hundred and forty-six spaces would be added to the main parking lot located to the northwest of the softball fields. The other 33 parking spaces would be added to the southern end of the existing dog park parking lot. An area within the RMSC main parking lot would be designated for shared parking. This shared area, located approximately northwest of the softball fields as shown in Figure 2, would be the only place in the sports complex where transit users would be permitted to park and ride light rail. Recreational users could park anywhere, including the designated shared area. The shared parking lot would be made up of a combination of new and existing parking. The existing parking area located adjacent to the proposed shared parking area would need to be reconstructed and restriped. The dog park parking lot would also be reconstructed and restriped because of its shifted location to the east and because of the addition of 33 spaces.

To service the RMSC parking lot and the Project drainage a proposed underground drainage system would be installed east of the proposed Valley Metro guideway eventually intercepting the Arizona Canal Diversion Channel. This system will be on RMSC property from approximately the proposed new driveway in the northern portion of the sports complex to south of the dog park.

The current RMSC driveway (access point) across from Mountain View Road would be permanently closed to allow for more efficient movement of light rail and vehicles through the Mountain View Road and 25th Avenue intersection. A new driveway approximately 250 feet north of the intersection would replace the closed driveway as shown on Figure 2. The driveway access to the softball fields from 25th Avenue for maintenance crews and emergency vehicles would be closed to avoid light rail conflicts with motorists inadvertently using this driveway to access the parking lot. A new road would, however, be added to the landscaped area between the dog park parking lot and the main parking lot, connecting these two parking areas for the first time—improving overall access to and within RMSC. This will also provide access to the softball fields for

maintenance crews and emergency vehicles. Finally, the southernmost dog park parking lot access would be shifted farther south to the end of the 33 added parking spaces and the end of the proposed station - refer to Figure 2.

The additional parking spaces would be added to a portion of the existing landscaped buffer fronting 25th Avenue, to a landscaped area adjacent to the softball fields and to the landscaped area just south of the dog park. No recreational amenities are within the landscaped buffer. The landscaped area between the parking lot and adjacent softball fields would also be converted for transportation use. This area contains a path/sidewalk that connects the parking lot and the recreational amenities on the eastern side of the park. The sidewalk would be relocated approximately 25-feet to the east, adjacent to the softball fields, maintaining the sidewalk between the parking lot and the recreational amenities to the east. This new sidewalk would be constructed to replace the current sidewalk that will be decommissioned. To not interfere with access to any Section 4(f) properties, temporary sidewalks may be necessary and will be in compliance with American with Disabilities Act of 1990. Additionally, the Build Alternative would construct a new sidewalk on the eastern side of 25th Avenue from the park-and-ride lot to across the station as shown in Figure 2. A signal would facilitate pedestrians crossing 25th Avenue to reach the station. The Build Alternative would also require that the dog park parking lot be shifted approximately 25 feet to the east into a landscaped portion of RMSC, resulting in a conversion of the sports complex landscaping to a transportation use. Additional conversions as a result of the light rail alignment would include an approximately 550-linear-foot strip of landscaping from the northern end of the dog park until the alignment turns onto Mountain View Road.

Because the Build Alternative would add approximately 179 parking spaces to the RMSC (approximately 146 would be shared), with the anticipated transit demand, there would be no interference with the availability of parking for recreational users. Furthermore, recreational users would have no parking restrictions; therefore, they would have more parking opportunities than current conditions. During construction, no interference with access to recreational amenities would occur in the RMSC because several alternative paths/sidewalks around the parking lots could be used. For example, pedestrians could cut through the parking lots not under construction to access recreational amenities throughout the park. Additionally, the relocation of the sidewalk from the landscaped area to an area adjacent to the softball fields would occur prior to decommissioning the current path; thus, access would not be impaired. The parking lot would be constructed during the summer, the off-peak season for RMSC when parking demand would be minimal.

RMSC would benefit from the Build Alternative because it would be enhanced through the addition of 179 parking spaces that could be used by recreational users. The designated shared parking area would also be enhanced through the installation of security cameras, an emergency call box and lighting. Access would also be improved by having light rail next to the sports complex. With the exception of the sidewalk, all the proposed changes to RMSC would convert landscaping to a transportation use. In total, 2.2 acres of the 92-acre Rose Mofford Sports Complex would be converted to a

transportation use (2.4 percent). With the exception of the sidewalk relocation, no recreational amenities would be affected. The new or temporary ADA compliant sidewalk(s) would be constructed prior to the existing sidewalk being removed to maintain any recreational activities associated with the sidewalk and to maintain access to recreational amenities the sidewalk connects within the sports complex. Lastly, the installation of the proposed drainage system within RMSC limits would improve the current onsite drainage within the parking area. For these reasons, FTA has determined that the use of the RMSC is a *de minimis* impact.

### **Constructive Use**

A constructive use of a Section 4(f) resource occurs when the transportation project does not incorporate land from the Section 4(f) resource, but the project's proximity impacts are so severe that the protected activities, features or attributes that qualify a resource for protection under Section 4(f) are substantially impaired. For example, a constructive use can occur as a result of an increase in noise levels or restrictions in access, or other impacts that could substantially impair aesthetic features or attributes of the resource.

The Build Alternative would introduce new visual elements such as an at-grade station, elevated trackwork on fill, overhead catenary poles and wires, and a traction power substation. These new elements would be consistent with the existing urban setting around RMSC, so the Build Alternative would not impair the visual setting. There are no noise-sensitive activities at RMSC. Examples of noise-sensitive activities include 1) hearing the performance at an outdoor amphitheater, 2) an urban park where serenity and quiet are significant attributes or 3) sleeping in the sleeping area of a campground. Also, no noise or vibration impacts were identified near RMSC. As described above, post-construction access through RMSC would change. None of the access modifications would interfere with the activities or purposes of Section 4(f) resources associated with the sports complex. In summary, the introduced visual elements of the light rail, noise and vibration, and access modification would not interfere with the activities or purposes of the RMSC; therefore, no constructive use of this Section 4(f) property would occur.

### **Temporary Occupancy**

A temporary use of a Section 4(f) resource occurs when there is a temporary occupancy of the property that is considered adverse in terms of the preservationist purpose of the Section 4(f) statute.

The construction at Rose Mofford Sports Complex would occur over two summers, to coincide with the sports complex's slow season and to avoid any chance of construction going into the sports complex's busy fall season. For two months during the first summer the drainage pipe would be installed – refer to Figure 2 for general layout plan. Over the two-month period, the parking lots, starting at the south end of Rose Mofford Sports Complex, would be closed for a few weeks and then reopened as the pipe

installation in that section of the sports complex is completed. Then as the pipe installation moves north, the next parking lot, or portion of, would be closed, continuing until the installation is complete. Because the remainder of the construction activities would take place the following summer, the disturbed sections of the parking lot would be temporarily paved with asphalt concrete. During installation of the proposed underground drainage system, access to Rose Mofford Sports Complex would be maintained and most parking would be available within a short walking distance (i.e., within approximately 400 feet). No recreational amenities would be impacted.

During the following summer the remainder of the construction activities at Rose Mofford Sports Complex would occur. Construction activities in the designated shared parking area would result in a temporary reduction in parking for park users and a temporary change in how amenities are accessed; particularly those in the southern part of the sports complex because they are closest to the shared parking area.. Additionally, one of the two entrances to the main parking lot would be permanently closed, but a new access would be created.

The temporary occupancy would not constitute a use because the construction activity, as discussed below, would meet all the conditions necessary so that it would not be considered adverse within the meaning of Section 4(f). The scope of the work is minor because the parking lots and accesses such driveways would be restored to a condition that would be better than the original condition. This is realized through improved access, repaving and constructing the other planned improvements to the existing lot. The construction work would last approximately 2 months the first summer and 4 to 6 months the second summer. This time period is considerably less than the total construction duration of 3.5 years. Valley Metro would undertake work in parking lots during the summers when Rose Mofford Sports Complex is closed; day and evening use is generally low because of the high temperatures experienced during summer months.

## **Summary**

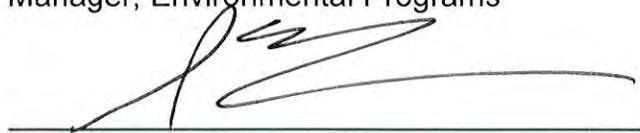
The temporary closure of the parking lots would allow continued use of the recreational resources during construction. Access would be available from parking lots in other areas of the recreational facility. All the pathways/sidewalks linking parking areas and recreational components of the park would remain open, so that no interruption of recreation or interference with access would occur. Therefore, no permanent physical impacts (use) on the Rose Mofford Sports Complex are anticipated, nor would there be interference with the activities or purposes of the sports complex on a permanent or temporary basis. Valley Metro would include information on its website regarding temporary parking restrictions as part of the public outreach process. Additionally, Valley Metro would provide signs at the sports complex regarding temporary parking restrictions. During construction of the modified access locations, Rose Mofford Sports Complex users could use the other entrance to the sports complex, which is approximately 620 feet north of the driveway slated for permanent closure. If you agree with the FTA's *de minimis* and temporary occupancy determinations please indicate

your concurrence by signing on the line provided and returning a copy to Valley Metro within 30 days. If you have general questions or require additional information, please contact me at 602-322-4514 or by email at [rforrest@valleymetro.org](mailto:rforrest@valleymetro.org).

Sincerely,



Robert Forrest  
Manager, Environmental Programs



Signature for City of Phoenix Concurrence

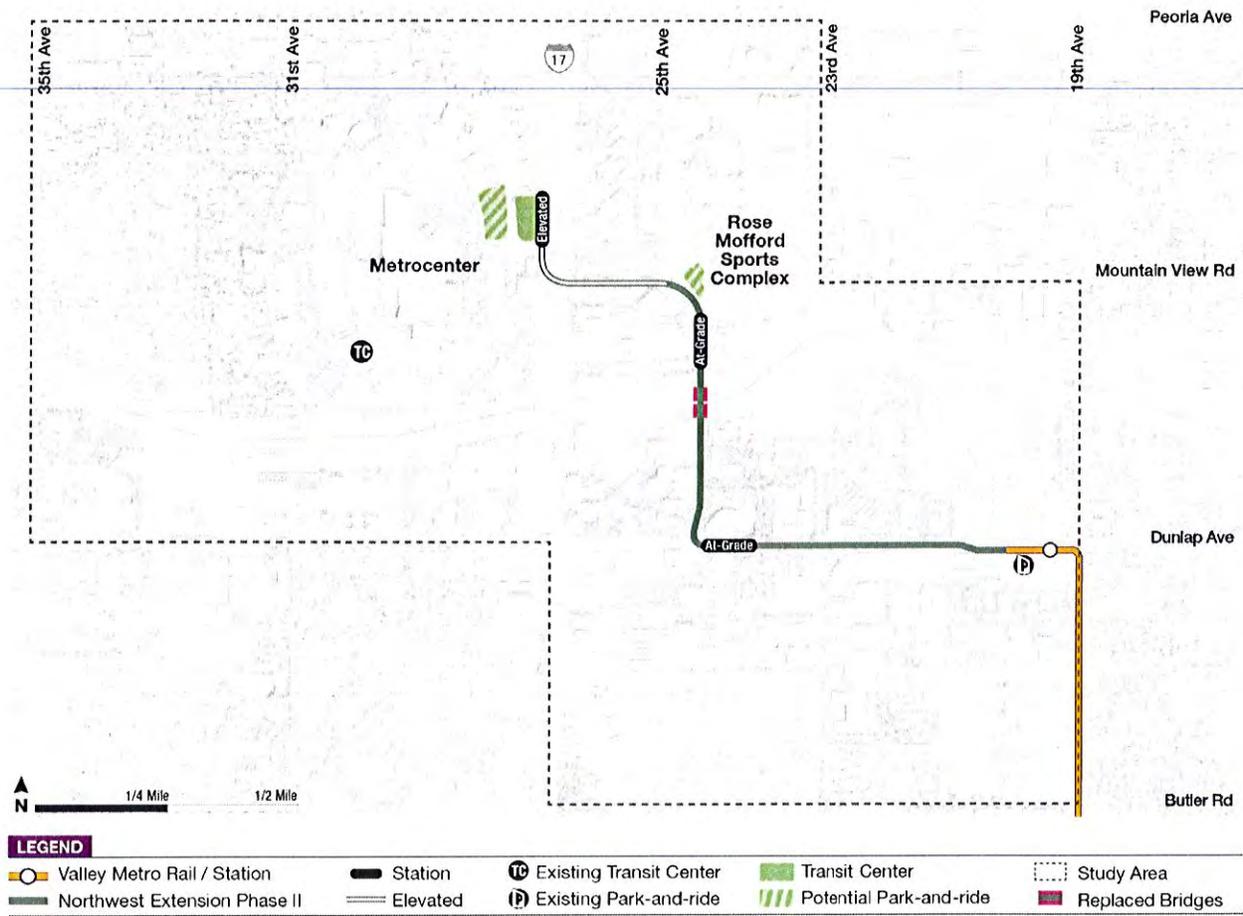
10/26/18  
Date

Enclosures: Figure 1 NWE II Study Area  
Figure 2 RMSC Shared Parking and Other Modifications

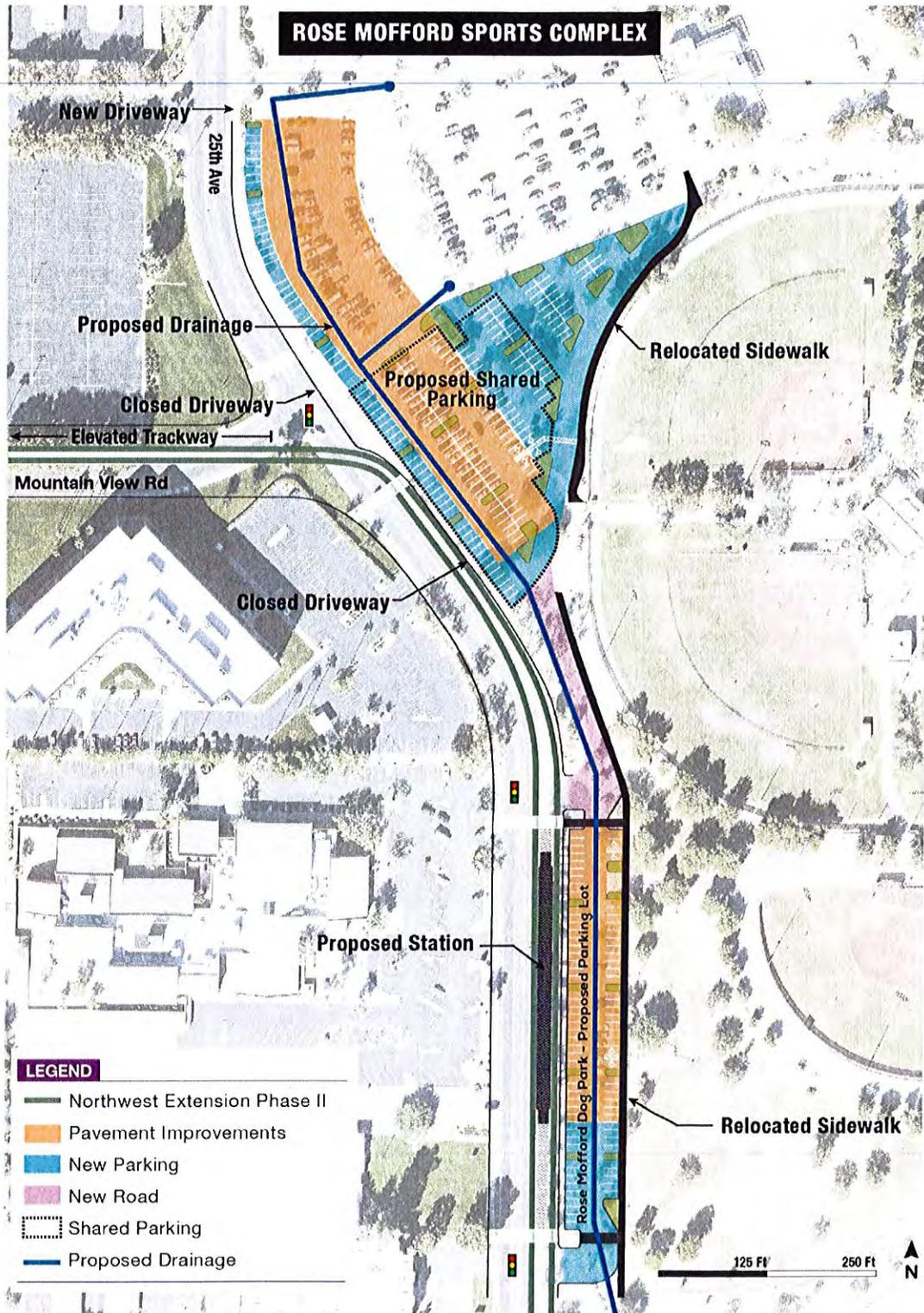
c: Jesus Sapien, City of Phoenix  
Carla Kahn, City of Phoenix  
Steven Williams, City of Phoenix  
Tim Merritt, City of Phoenix



**FIGURE 1: NORTHWEST PHASE II LIGHT RAIL  
 EXTENSION PROJECT STUDY AREA**



**FIGURE 2: ROSE MOFFORD SPORTS COMPLEX SHARED PARKING AND OTHER MODIFICATIONS**



**From:** [Duncan James C \(Jim\)](#)  
**To:** [Unger, Audrey C.](#)  
**Subject:** RE: Northwest Phase II Light Rail Extension Project  
**Date:** Tuesday, October 23, 2018 2:44:40 PM

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SRP concurs on the de minimis finding for this project,

Thank you,

Jim

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**From:** Unger, Audrey C. <Audrey.Unger@hdrinc.com>  
**Sent:** Tuesday, October 23, 2018 2:07 PM  
**To:** Duncan James C (Jim) <Jim.Duncan@srpnet.com>  
**Subject:** Northwest Phase II Light Rail Extension Project

**\*\*\* SRP EXTERNAL EMAIL WARNING: EXERCISE CAUTION WHEN HANDLING UNEXPECTED EMAILS. REPORT ANYTHING SUSPICIOUS. \*\*\***

Good Afternoon Mr. Duncan:

The Federal Transit Administration (FTA), in coordination with Valley Metro and the City of Phoenix, is planning the Northwest Phase II Light Rail Extension Project (Project). The Project is 1.55 miles long, extending the existing Valley Metro light rail line from its current terminus at Dunlap and 19th Avenues to Metrocenter on the western side of Interstate 17. As part of the Project, the two separate concrete bridges on 25th Avenue which span the Arizona Canal and the Arizona Canal Diversion Channel (ACDC) would be removed and replaced with wider bridges spanning the canals to accommodate both light rail and vehicular traffic. The new bridges would be approximately 27 feet wider than what currently exists and would thus convert small portions of the Sun Circle and Arizona Canal Trails (located on top of the canal banks) to a transportation use (that is, the new, wider bridges).

In June of 2018 SRP concurred on a *de minimis* and temporary occupancy finding under Section 4(f) for the Sun Circle and Arizona Canal Trails (additional information is in the original attached letter). The comment period for the Environmental Assessment for the Northwest Phase II Light Rail Extension ended on October 22; no comments on the bridges, canals, or trails were received. Now that the public comment period is over, FTA is asking that SRP reconfirm their concurrence. We'd appreciate it if you could either sign the new letter (only the sent date has changed) or simply respond to this email indicating your concurrence. If you have any additional question, please contact me at [audrey.unger@hdrinc.com](mailto:audrey.unger@hdrinc.com) or at 602.740.4842 or Robert Forrest, Valley Metro Environmental Program Manager at [Rforrest@valleymetro.org](mailto:Rforrest@valleymetro.org) or at 602.322.4514.

Thank you and our apologies for the inconvenience.

**Audrey Unger**, MEP, PMP

*Environmental Sciences and Planning and Real Estate Services  
Cross-Sector Services Manager  
Associate*

**HDR**

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