

**NOUPT/Loyola Avenue Streetcar  
New Orleans, Louisiana**

**Finding of No Significant Impact (FONSI)**

**by the**

**U.S. Department of Transportation**

**Federal Transit Administration**

The Federal Transit Administration (FTA) has determined, in accordance with 23 CFR §771.121, that the proposed New Orleans Union Passenger Terminal (NOUPT)/Loyola Avenue Streetcar Project will have no significant adverse impacts on the environment.

This Finding of No Significant Impact (FONSI) is based on the NOUPT/Loyola Avenue Streetcar Environmental Assessment (EA), issued in August 2010 and incorporated by reference, other documents and attachments as itemized in this FONSI and the findings herein. The EA and these other documents have been independently evaluated by the FTA and determined to accurately discuss the project purpose, need, environmental issues, impacts of the proposed project, and appropriate mitigation measures. It provides sufficient evidence and analysis for determining that an Environmental Impact Statement is not required.



Date

11/24/10

Robert Patrick  
Region 6 Administrator  
Federal Transit Administration

**FEDERAL TRANSIT ADMINISTRATION  
REGION 6**

**Finding of No Significant Impact**

**Project:** NOUPT/Loyola Avenue Streetcar Project  
**Applicant:** Regional Transit Authority  
**Project Location:** New Orleans, Orleans Parish, Louisiana  
**FTA Grant No:** LA-78-0001-00

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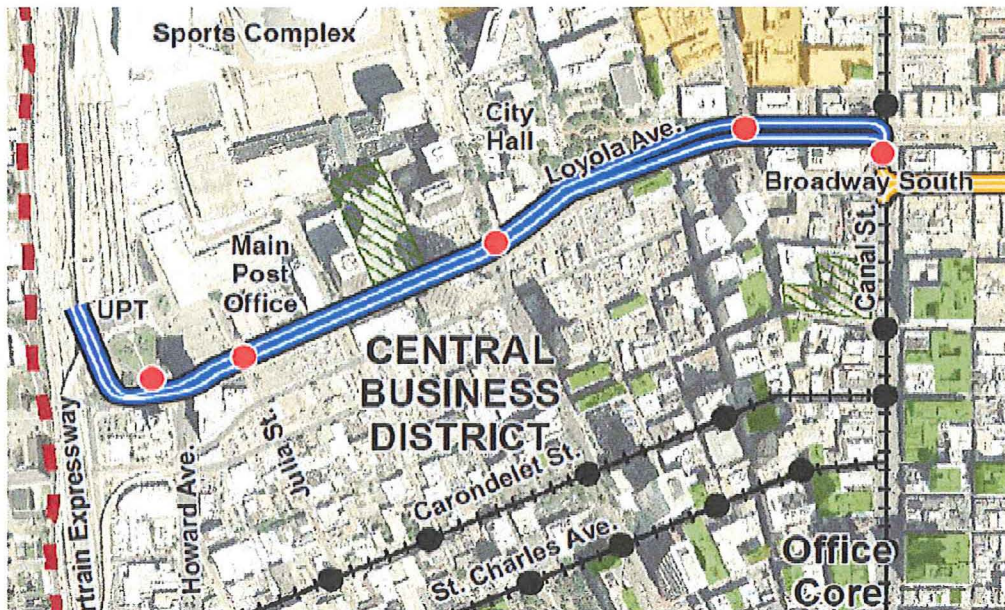
**Introduction**

This document provides the basis for a determination by the Federal Transit Administration (FTA), U.S. Department of Transportation, of a Finding of No Significant Impact (FONSI) for the NOUPT/Loyola Avenue Streetcar Project (Project) proposed by the Regional Transit Authority (RTA) in New Orleans, Louisiana. This determination is made in accordance with the National Environmental Policy Act of 1969 (NEPA) (42 U.S.C. §4332 *et seq.*), as amended.

The RTA completed an Alternatives Analysis (AA) and Conceptual Engineering in June, 2009, to evaluate transit service improvements in the Central Business District (CBD) and improved connection to the French Quarter in New Orleans, Louisiana. Several alignment options were identified and studied during the AA. Three corridors were identified: the New Orleans Union Passenger Terminal (NOUPT)/Loyola Avenue corridor; the Convention Center Boulevard corridor; and the French Quarter/North Rampart Street corridor. The NOUPT/Loyola Avenue corridor was adopted as the Locally Preferred Alternative (LPA) by the RTA Board of Commissioners in June, 2009, and this action was updated in the adopted New Orleans Transportation Improvement Plan in August, 2009.

## **Proposed Project**

The NOUPT/Loyola Avenue Streetcar line will run between the New Orleans Union Passenger Terminal and Canal Streetcar line, traveling mostly in the lanes adjacent to the median on Loyola Avenue to connect to the Canal Streetcar line at Canal Street/North Rampart Street (see map below). Documentation of Preliminary Engineering results is contained in the Advanced Preliminary Engineering Report, dated June 2010, and submitted as part of the current project documentation to the FTA.



## **Alignment**

The NOUPT/Loyola Avenue streetcar line is a 0.8 route mile (1.6 track mile) double-tracked alignment operating between the NOUPT and Canal Street, where a connection with the existing streetcar system is made. The alignment begins at the NOUPT, located at 1001 Loyola Avenue, south of Howard Avenue. The specific location of the NOUPT stop is located in the Earhart surface parking lot south of Bienville Plaza in an area that is proposed to be redeveloped as a multimodal transit (bus and streetcar) transfer facility. From the parking lot, the alignment enters the median of Loyola Avenue, where a transition is made between Howard Avenue and Julia Street to the two inside travel lanes of Loyola Avenue adjacent to the median. A storage track approximately 500 feet in length is located between the two tracks near the Julia Street intersection. The alignment occupies the left-hand travel lane in both directions along Loyola Avenue and Elk Place to Canal Street, where track connections are made to the Canal Streetcar line in both directions.

## **Trackway**

The NOUPT/Loyola Avenue Streetcar line includes two tracks with trains operating at grade in both directions. The tracks would be located on either side of the median, in the left-hand travel lane within the street right-of-way. The trackway is in shared travel lanes in mixed traffic.

### **Stations**

Streetcar stations include 60'foot long, low-level concrete platforms located in the median, with shelters, benches, and electronic information kiosks. Four station stops are proposed on Loyola Avenue for this streetcar line: 1) at the NOUPT; 2) at Julia Street (near side of intersection in both directions); 3) at Poydras Street (near side of intersection in both directions); and 4) at Tulane Avenue (north side of street in both directions). The proposed station locations are further detailed in the Advanced Preliminary Engineering Report.

### **Vehicles**

The Proposed Action will use vehicles that are part of the existing fleet of replica streetcars that operate on the Canal Street and Riverfront lines. The RTA has full capability to assemble streetcar vehicles in the Agency's shop, and will provide all vehicles needed for the service expansion, with no degradation to the availability of sufficient vehicles for use on the existing lines. The track and systems infrastructure on the Loyola Avenue portion will be fully compatible with the connecting lines, allowing the existing vehicle fleet to operate on the new project.

### **Traffic Signals**

Existing traffic signalization will be modified at the intersection of Loyola Avenue and Howard Avenue and at the intersection of Elk Place and Canal Street to accommodate streetcar turning movements. The traffic signal plans are included in the Traffic Operations and Analysis Report, Appendix C of the EA.

### **Traction Power Substations**

No new traction power substations will be constructed as part of the Loyola Avenue project. The existing substation at the RTA maintenance facility on Canal Street will provide the necessary power to the project.

### **Maintenance and Storage Facility**

The existing RTA maintenance and storage facility will serve the vehicles used on the NOUPT/Loyola Avenue Streetcar project. No new maintenance facility construction will occur.

### **Agency Coordination and Public Opportunity to Comment**

- The Public Involvement Program (PIP) provided an effective tool in implementing an active engagement approach, and providing an open, proactive, and participatory process for the public, affected agencies, and others to become partners with the Project Team. The PIP utilized a variety of consensus-building tools to engage the public and to assure it had opportunities to participate. At the inception of the EA/PE study, the PIP prepared for the EA was updated, and sent to FTA for review.
- At the inception of the EA, an Agency Coordination Plan was developed, many agencies and public organizations were invited to comment and participate in the project study. Information regarding the PIP and report can be found in Appendix F of the EA.
- The Draft EA was published in August 2010. The 30-day public comment period began October 11, 2010 and ended November 11, 2010. The legal advertisement for the EA ran in the *Times-Picayune* on October 11, 2010. The stakeholder database was sent electronic mail notification of the availability of the EA and its Appendices on the RTA's website. Copies of the EA were sent to 8 individuals, agencies, and tribes. Copies were also available at the New Orleans Public Library on

Loyola Avenue, the New Orleans RTA's offices, the New Orleans Regional Planning Commission's office, the City of New Orleans, and FTA's office.

- One Hundred and Six (106) individuals, agencies, and tribes received the Notice of Availability (NOA), as did the RTA Board of Commissioners, the Commissioners of the City of New Orleans, the City of New Orleans Planning Advisory Board.

### **Written Comments and Responses on the EA**

Appendix B to this FONSI includes the four written comments received during the 30-day public comment period of the EA and responses to each one. On November 18, 2010, RTA and FTA received a support letter from the New Orleans City Council (see Appendix I of the EA).

### **Mitigation Measures to Minimize Harm**

RTA will implement all mitigation measures to which the EA commits and will coordinate with other public agencies on design issues related to the project as stipulated in the EA. FTA will require in the funding agreement with RTA that all committed mitigation be implemented. FTA will require that RTA include in its Project Management Plan (PMP) a process for ensuring the implementation of all mitigation commitments. Mitigation commitments contained in the EA will be implemented and monitored by RTA through quarterly updates of the Mitigation Monitoring Program, Appendix A, or by other means presented in the PMP and approved by FTA. The FTA finds that with the implementation of these mitigation measures, the RTA will have taken all reasonable, prudent, and feasible means to avoid or minimize impacts from the proposed action.

### **DETERMINATIONS AND FINDINGS**

#### **National Environmental Policy Act (NEPA) Finding**

FTA served as lead agency under NEPA for the project. RTA, with FTA oversight, prepared an EA in compliance with NEPA, 42 U.S.C. Section 4321 et.seq., and with FTA's implementing NEPA regulation at 23 CFR Part 771. The EA analyzes and describes the project's potential significant impacts.

RTA conducted an AA in 2009. Subsequently, RTA conducted the EA in 2009-2010. FTA reviewed preliminary versions of the EA. The EA was issued in September 2010. The EA found that the project's construction and operation would cause no significant adverse environmental effects that would not be mitigated. This would apply to all applicable environmental elements including Air Quality; Land Use and Zoning, Environmental Justice, Social Impacts, Transportation, Noise, Geology and Soils, Hazardous Materials, Water Resources, Biological Resources, Visual Quality, Cultural Resources, Recreation and Section 4(F) Resources, Safety and Security, and Public Services and Utilities.

After carefully considering the EA, its supporting documents, and the public comments and responses, **FTA finds under 23 CFR 771.121 that the proposed project, with the mitigation to which the RTA has committed during Final Design, Construction and Operation, will have no significant adverse impacts on the environment.** The record provides sufficient evidence and analysis for determining that an EIS is not required.

### **Environmental Justice Findings**

Executive Order 12898 provides that “each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority and low-income populations.” The U.S. Department of Transportation order implementing the Executive Order similarly requires FTA and FHWA to explicitly consider human health and environmental effects related to transit projects that may have a disproportionately high and adverse effect on minority and low-income populations. It also requires them to implement procedures to provide “meaningful opportunities for public involvement” by members of these populations during project planning and development. (DOT Order, as published at 62 FR 18377 on April 15, 1997)

RTA performed an environmental justice analysis as part of the EA. The analysis indicates that the proposed project would likely have beneficial effects on minority and low-income populations by providing convenient and affordable transportation opportunities throughout the CBD. Based on that analysis, **FTA finds that the construction and operation of the NOUPT/Loyola Avenue Streetcar Project would not have disproportionately high and adverse effects on low-income or minority populations.**

### **Hazardous Materials Findings**

A Phase I Environmental Site Assessment (ESA) of the project area concluded that the Union Passenger Terminal within the Project limits is a potential source of contamination. Instead of a Phase II Site Assessment, Environmental Construction Monitoring (ECM) will be implemented, along with a Soil Management Plan or Contaminated Media Management Plan (CMMP).

The RTA’s responsibility for remediation costs is governed by Louisiana Revised Statute 30:2286.1, which outlines the submission and approval of a voluntary remedial action plan that will be approved by the Louisiana Department of Environmental Quality (LDEQ). The mitigation procedures listed in Appendix A were agreed upon with LDEQ in August 2010, see correspondence in Appendix I of the EA.

### **Transportation and Traffic Findings**

A traffic impact analysis and pedestrian mobility analysis was conducted for twelve intersections on the project alignment. The analysis found that intersection operations would not be impacted as a result of Project implementation, as the level of service at each intersection remains acceptable at each intersection during the 2012 Build scenario. Operations deteriorate at the intersections of Loyola Avenue/Elk Place and Canal Street and Canal Street and Rampart Street during the 2022 Build condition. However, operations can be improved with signal timing optimization which is typically completed on a routine basis as traffic volumes change along the corridor.

**With the traffic-related mitigation described in Appendix A, FTA finds that the local roadway system is adequate to support safe and efficient operations of the proposed streetcar line, as well as automobile traffic.**

### **Noise and Vibration Findings**

The noise and vibration impact assessment for the NOUPT/Loyola Avenue line follows the procedures in the FTA guidance manual.<sup>1</sup>

**Operational Noise Impacts:** The primary noise source along the Loyola Avenue corridor is existing traffic on Loyola Avenue and Canal Street. Ambient noise measurements at representative sites were performed at six sites: one long-term site (LT-1) and five short-term sites (St-1 through ST-5).

Noise impact analysis for streetcar operations on regular tracks was evaluated for 19 (three Category 1, seven Category 2 and nine Category 3) sensitive receivers. No noise impacts are predicted from streetcar operations on regular tracks.

Wheel squeal noise impact analysis was performed for five sensitive receivers located close to the curved tracks. Moderate noise impacts from wheel squeal are predicted for four sensitive receivers as follows: Loew's State Theater, Saenger Theater, 1201 Canal Street Condos and the Woolworth Building.

Wheel squeal noise usually can be controlled by (1) applying a friction modifier to the railhead and/or the wheel tread, (2) applying lubricant to the gauge face of the rail or the wheel flange, or (3) optimizing the wheel and rail profiles. It will sometimes require more than one of these measures to fully control wheel squeal.

**Operational Vibration Impacts:** The vibration assessment for the streetcars include: (1) vibration from the normal operation of the streetcars on regular track, (2) vibration amplification at special track work, and (3) an adjustment factor to account for coupling loss at the soil/building interface and potential vibration amplification due to resonances of building structures.

The FTA vibration thresholds do not specifically account for existing vibration. It is relatively rare that rubber-tired vehicles such as buses and trucks will generate perceptible ground vibration unless there are irregularities in the roadway surface, such as potholes or wide expansion joints. However, measurements of existing vibration along the proposed project corridor show that the traffic-generated groundborne vibration often exceeds 70 VdB in the Loyola corridor. In addition, sensitive receivers on Canal Street already experience vibration from the Canal Streetcar line.

Groundborne noise and vibration impacts from streetcar operations are predicted at the Saenger Theater and the Loew's State Theater. Impacts at both theaters are due to the proximity to special track work. The use of a "well-designed" flange-bearing frog with a minimum ramp length of two feet at the crossovers should be sufficient to eliminate the predicted vibration impacts from streetcar operations. The use of this type of frog has been incorporated into the track design of the Loyola Avenue corridor.

One potential concern is historic buildings and other cultural resources that may be fragile and particularly susceptible to damage from ground motions. Several historic buildings and other resources have been identified along the alignment. However, none of the structures appear to be unusually fragile. Therefore, the vibration assessment of these structures is based on the current use of the building.

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<sup>1</sup> Federal Transit Administration Office of Planning and Environment, *Transit Noise and Vibration Impact Assessment Guidance Manual*, Document FTA-VA-90-1003-06, May 2006.

**Construction Noise and Vibration:** Similar to other major infrastructure projects, construction would require use of heavy equipment that generates relatively high noise and vibration levels. Specific measures to be employed to mitigate construction noise impacts will be developed by the final design contractor and presented in the form of a Noise Control Plan.

**With the mitigation commitments (see Appendix A) to which the RTA has committed, FTA concludes that no noise and vibration impacts are predicted from the operation and construction of the NOUPT/Loyola Avenue Streetcar line. The noise and vibration created by this project will have no significant adverse impacts on the environment.**

### Air Quality Conformity

The Clean Air Act and its amendments (CAA) establish National Ambient Air Quality Standards (NAAQS) for four transportation-related pollutants – carbon monoxide (CO), respirable particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub> which are particulate matter smaller than 10 micrometers and 2.5 micrometers in diameter, respectively), nitrogen dioxides (NO<sub>2</sub>), and ground-level ozone (generated by reactions of volatile organic compounds).

Under federal regulations, areas that violate ambient air quality standards are designated as nonattainment areas. A State Implementation Plan (SIP) must be developed to bring these areas into attainment. The Federal Clean Air Act Amendments of 1990 require that transportation plans, programs and projects in nonattainment areas conform to the appropriate SIP. SIP conformity involves eliminating or reducing the severity and number of violations of the NAAQS and achieving attainment of those standards.

Based on the Environmental Protection Agency's Green Book last updated on their website on Wednesday, January 6, 2010, the state of Louisiana is in attainment for all National Ambient Air Quality Standards for criteria pollutants, with the exception of ozone in the five parish area that includes the city of Baton Rouge (information verified April 8, 2010).

The New Orleans urbanized area (the location of the Proposed Action), which includes four parishes, Jefferson, Orleans, St. Bernard and St. Charles, was designated as an air-quality maintenance area for ozone in accordance with the Clean Air Act Amendments in 1995. However, the four parishes comprising the New Orleans maintenance area under the 1-hour standard were redesignated as being in attainment of the 8-hour ozone standard in EPA's final designation rule on April 30, 2004 (69 FR 23858). Attainment of the 8-hour standard for ozone in the New Orleans Standard Metropolitan Statistical Area (SMSA) was based on three consecutive years of air-quality monitoring data which demonstrated compliance with the NAAQS for all criteria pollutants.

The project would neither increase the frequency of or severity of any existing violation of the CO standard, nor create a new violation of CO standards. **At both the regional and "project" level, the project conforms with the SIP and meets all requirements of the state and federal clean air acts.**

### Floodplain Findings

Protection of floodplains and floodways is required by Executive Order 11988, Floodplain Management; US DOT Order 5650.2, Floodplain Management and Protection. Although the proposed project lies within the 100-year floodplain, the floodplain does not function, as the area within the project corridor is under "pump and levee" and, therefore, a permit is not anticipated.



**FTA finds that no adverse impacts to any 100-year floodplains or floodways would occur as a result of the proposed project.**

### **Wetlands Findings**

The proposed project is located within the Coastal Zone as defined by Act 361, La. R.S. 49:214.21 *et seq.*, of the State and Local Coastal Resources Management Act (SLCRMA) and depicted on the Louisiana Coastal Zone boundary Map (2002). A Coastal Use Permit is required for construction within the coastal zone. Coastal Use Permits are administered through the Coastal Management Department of the Louisiana Department of Natural Resources.

Project-specific guidelines have been developed to regulate projects within the coastal zone. These guidelines, as defined in Louisiana Coastal Resources Program Regulations (LCRPR 43:1), were developed to prevent deterioration of the coastal zone environment. Guidelines pertaining to the proposed streetcar alternative include: Subsection 701, all uses; Subsection 705, linear facilities; Subsection 711, surface alterations; and Subsection 717, uses that result in the alteration of waters draining into coastal waters. The project is consistent with the Louisiana Coastal Zone Management regulations.

No wetlands or water would be crossed by the proposed project. Because of the urbanized nature of the study area, no biologically important areas would be affected. The proposed project would comply with all guidelines within relevant subsections of the LCRPR. Additionally, best management practices would be implemented to further avoid and minimize impacts within the coastal zone. No mitigation will be required. **FTA finds that the project meets the federal wetlands requirements described above.**

### **Endangered Species Act Findings**

The Endangered Species Act of 1973, as amended (ESA), intends to protect threatened and endangered species and the ecosystems on which they depend. The ESA requires a federal agency to ensure that any action it authorizes, funds or carries out is not likely to jeopardize the continued existence of any listed species or result in direct mortality or destruction or adverse modification of critical habitat of listed species. This requirement is fulfilled under section 7 of the ESA by review of the proposed actions and consultation with the appropriate agency responsible for the conservation of the affected species. If necessary, mitigation will be required to avoid jeopardizing listed species or their habitat.

The Louisiana Department of Wildlife and Fisheries database of threatened and endangered species was reviewed to determine the presence of protected species in the project area. Four of the five species listed are aquatic and thus will not be impacted by the Proposed Action. The fifth species, the Bald Eagle, has shown a strong resurgence in recent years longer and is no longer federally protected.

Suitable habitat for the bald eagle does not exist within the project corridor. Although observation of this species in the outlying wetlands areas of New Orleans is possible, the study area does not provide foraging or nesting habitat for the bald eagle. Consequently, the proposed project would have no effect on the bald eagle.

The Proposed Action will not directly impact and threatened or endangered species therefore no mitigation is required. **FTA finds that the project meets requirements related to the Endangered Species Act described above.**

### **Safety Compliance**

The RTA is committed to the safety of its customers and the community it serves. RTA will be required by the FTA to establish a System Safety Certification Plan (SSCP), which will begin during Final Design phase of this project. All safety commitments for the project are summarized in Appendix A, Mitigation and Monitoring Plan.

### **Americans with Disabilities Act Compliance**

The RTA will design, build and maintain pedestrian paths, sidewalks, crossings, etc., that are compliant with the Americans with Disabilities Act (ADA) and will be inspected and will adhere to applicable City, State, and Federal ADA regulations.

### **Section 106 Compliance**

Section 106 of the National Historic Preservation Act of 1966, as amended, requires the review of federally assisted projects for impacts to districts, sites, buildings, structures, and objects listed in, or eligible for inclusion in, the National Register of Historic Places. Federal agencies must coordinate with the State Historic Preservation Officer (SHPO) and the Tribal Historic Preservation Officer (THPO) of potentially affected Federally-recognized Native American Indian Tribes to make this determination. The Advisory Council on Historic Preservation (ACHP) has established procedures for the protection of historic and cultural properties in, or eligible for, the National Register (36 CFR Part 800).

The Cultural Resources Assessment prepared for this project revealed that the NOUPT/Loyola Avenue Streetcar project has the potential to impact various historic properties. These are two National Register of Historic Places (NRHP) Districts (NRD)—the Lower Central Business District (CBD) and the Vieux Carré (French Quarter), which is also a National Historic Landmark (NHL); one NRHP listed property—the Saenger Theater; one NRHP eligible property—NOUPT; and one NRHP eligible object—the Molly Marine statue.

Based on the current findings, the Loyola corridor streetcar project will have no adverse effects on the NRDs, the individual properties, or the object. Vibration and noise studies have concluded that any adverse impacts from construction of the streetcar line can be mitigated to eliminate any adverse effects on the historic districts or properties. The vibration and noise studies further found that operation of the streetcar will have no adverse effect on historic resources. Archaeological monitoring is recommended along that portion of North Rampart Street between Canal and Iberville Streets where the remains of the French fortifications (Redoubt de Borgogna) may be intact. The SHPO, federally recognized Native American Indian Tribes (Chitimaca, Choctaw, and Tunica-Biloxi), as well as the National Park Service (NPS) have been contacted as part of the consultation and review process under Section 106 of the National Historic Preservation Act (NHPA), as amended. The SHPO has reviewed the technical report of the cultural resources assessment. The SHPO has concurred with the finding of no adverse effect in a letter dated November 19, 2010, contained in Appendix I of the EA. The SHPO's request that special measures be taken to protect the "Molly Marine" statue is included in Appendix A, Mitigation Monitoring Plan. The SHPO's requests have been incorporated into the final report of the Cultural Resources Assessment, contained in Appendix G of the EA.

Based on the cultural resources analysis and coordination with the THPOs, SHPO, and NPS, **FTA finds that the project could have construction-related effects on identified cultural or historic resources. Commitments that will be followed during Final Design, Construction and Operations are included in this FONSI in Appendix A. FTA finds that the Section 106 coordination and consultation requirements for this project have been fulfilled.**

#### **Section 4(f) Findings**

Section 4(f) of the Department of Transportation Act of 1966, codified at 49 U.S.C. §303, and as implemented by FTA's regulation at 23 C.F.R. Part 774, prohibits the use of land from publicly owned parks, recreation areas, wildlife or waterfowl refuges, or historic sites for any federally funded transportation program, unless a determination is made that: (1) there is no feasible and prudent alternative to using such land; and (2) the program or project includes all possible planning to minimize harm to the land resulting from its use.

There are three parks directly adjacent to the Loyola Avenue corridor:

**Cancer Survivors Park:** opened in 1995 by Parkway Partners and the City of New Orleans is located on the Loyola Avenue roadway median at Poydras St. The Cancer Survivor's Park is approximately 14,860 square feet in area.

The proposed use of the parkland by the Proposed Action is limited to replacement of the eight existing light poles, which are located along the edges of the median. The new poles are designed to support the catenary system and provide the same amount of light as is present in the park now. Note that there are no plans to excavate for additional poles. The existing poles are a sufficient distance from the monuments and columns that there will be no impacts to these by the proposed replacement. Also, it is important to note that the existing light poles are not directly associated with the park, but are the standard modern light poles found throughout the City of New Orleans and other urban areas.

The direct use of Cancer Survivor's Park does not affect its use or enjoyment and, pursuant to 23 C.F.R. §774.3(b), is therefore considered to be a *de minimis* impact. As such, no additional mitigation is required beyond what is proposed for the *de minimis* impact finding.

**Duncan Plaza:** a 6.8 acre park, is the open space that lies in the New Orleans Civic Center area on Loyola Avenue between Gravier and Perdido Streets. It is adjacent to the Louisiana State Office Building and the Louisiana Supreme Court and just across Gravier from the Main Library.

There is no direct or constructive use of Duncan Plaza, so no mitigation is required.

**Elk's Place Park:** is a small park (approximately 0.83 acre) located in the median between Tulane Avenue and the first block of Basin Street. The park includes two monuments to honor women in the military and a number of marble/ granite markers inset in the walkway down the center of the median. The markers commemorate important dates in Louisiana and New Orleans.

The proposed streetcar station stops at Tulane Avenue will be located within Elk's Place Park just north of the intersection of Loyola Avenue and Tulane Avenue, in the direction of Canal Street. The platform for southbound (toward NOUPT) streetcars would be located on the near side of the Tulane Avenue intersection, and the platform for northbound (toward Canal Street) streetcars would be located on the far side of the intersection.

The proposed use of Elk's Place parkland occurs at the western edge of the park. The proposed stops will flank the existing marble dedication marker. The proposed plan includes leaving the existing marker in place and restoring the walkway down the center of the park. The stops are designed in such a manner as to avoid damaging the existing oak trees that line the median.

The direct use of Elk's Plaza does not affect its use or enjoyment and, pursuant to 23 C.F.R. §774.3(b), is considered to be a *de minimis* impact. As such, no additional mitigation is required beyond what is proposed for the *de minimis* impact finding.

The proposed project would also have a *de minimis* impact on Section 4(f) historic sites in the immediate area of the project.

**FTA finds that the proposed project will either have no impact or have a *de minimis* impact on publicly owned parks, historic sites, or recreational resources protected by Section 4(f) of the DOT Act of 1966.**

#### ENVIRONMENTAL FINDING


The following documents are attached and incorporated by reference as part of this FONSI:

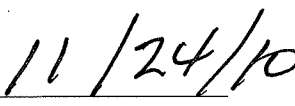
- Appendix A: Mitigation and Monitoring Plan
- Appendix B: EA Comments and Responses

Based on the Environmental Assessment and its associated supporting documents, the Federal Transit Administration finds pursuant to 23 CFR 771.121 that there are no significant impacts on the environment associated with the development and operation of the proposed NOUPT/Loyola Avenue Streetcar project.

In addition, in accordance with the provisions of 49 USC 5324(b), FTA finds that—

- (i) an adequate opportunity to present views was given to all parties having a significant economic, social, or environmental interest in the project, as detailed in Chapter 5 and Appendix F of the EA and in Appendix B of this FONSI;
- (ii) the preservation and enhancement of the environment and the interest of the community in which the project is located were considered; and
- (iii) no significant adverse environmental effect will result from the project, and all reasonable steps have been taken to minimize the adverse effects, as detailed in the EA and summarized in Appendix A of this FONSI.

  
Robert Patrick  
Regional Administrator

  
Date

### **Mitigation and Monitoring Plan**

The mitigation measures and other project features that reduce adverse impacts, to which FTA and RTA committed in the EA, are summarized in the following table. This summary table is provided in the FONSI to facilitate the monitoring of the implementation of the mitigation measures. However, the EA provides the full description of all mitigation measures that are included in the Project. RTA will establish a program for monitoring the implementation of the mitigation measures as part of its Project Management Plan.

RTA is prohibited from eliminating or altering any of the mitigation commitments identified in the EA for the Project without express written approval by FTA. In addition, any change to the Project that may involve new or changed environmental or community impacts not considered in the EA must be reviewed in accordance with FTA environmental procedures (23 CFR Part 771). RTA will immediately notify FTA of any change to the Project that differs in any way from what the EA states. If a change is needed, the FTA will determine the appropriate level of environmental review (i.e., an environmental assessment of the change), and the NEPA process for this supplemental environmental review will conclude with a separate NEPA determination, or, if necessary, an amendment of this FONSI.

No.	Impact/Mitigation Measure	Implementation & Monitoring	Responsible Party	Timing
1	<p><u>Vibration Impacts</u></p> <p>Ground-borne noise and vibration from streetcar operations are predicted to exceed the FTA impact threshold at Loew's State Theater and Saenger Theater.</p>	<p>A qualified engineer will conduct a pre-construction survey of all fragile historic buildings along the Loyola corridor including the UPT building, Molly Marine and other monuments located at Elks Place Park. The survey will include inspection of building foundations and structural elements and documentation of the existing conditions. All recommendations from the survey shall be implemented during construction.</p> <p>Well-designed flange-bearing frogs with 2 ft 1 in long ramps are included in the technical specifications for all special trackwork along the project corridor.</p>	RTA	Final Design, Construction
2	<p><u>Noise Impacts</u></p> <p>Noise impacts are predicted at four sensitive receivers due to wheel squeal noise from the curves where the Loyola Avenue line connects to the Canal Streetcar line. The predictions assume the worst case with substantial noise from wheel squeal.</p>	<p>A wheel squeal noise control plan will be included in the technical specifications for operations and maintenance of the project. The specifications will require either a system to apply friction modifier to the rail head or wheel tread, or equipment to apply lubricant to the gage face of the rail or the wheel flange to reduce wheel squeal noise at all curves that have a radius that is less than 400 ft.</p>	RTA	Final Design, Construction, Operations
3	<p><u>Section 106/Cultural Resources</u></p> <p>The Cultural Resources Assessment prepared for this project revealed that the NOUPT/Loyola Avenue Streetcar project has the potential to impact various historic properties. These are two National Register of Historic Places (NRHP) Districts (NRD)—the Lower Central Business District (CBD) and the Vieux Carré (French Quarter), which is also a</p>	<p>The Union Passenger Terminal Station Stop design must be coordinated with SHPO at 60%, 90% and 100% design stage, so that the OCS, canopies, and signage is designed in such a manner to blend with the building's symmetry and existing canopies and signage.</p> <p>If it is anticipated that depth of construction disturbance will substantially exceed the</p>	RTA, SHPO	Final Design, Construction

	<p>National Historic Landmark (NHL); one NRHP listed property—the Saenger Theater; one NRHP eligible property—NOUPT; and one NRHP eligible object—the Molly Marine statue.</p> <p>Based on the current findings, the Loyola corridor streetcar project will have no adverse effects on the NRDs, the individual properties, or the object. Vibration and noise studies have concluded that any adverse impacts from construction of the streetcar line can be mitigated to eliminate any adverse effects on the historic districts or properties. The vibration and noise studies further found that operation of the streetcar will have no adverse effect on historic resources.</p>	<p>anticipated general disturbance level of 36 in (91.4 cm) (e.g., during utilities relocation), then archaeological data recovery should be considered in those areas where the city fortifications are likely preserved (e.g. Rampart between Canal and Iberville).</p> <p>The locations of individual improvements (e.g. stops, shelters, and utility relocations) requiring substantial subsurface disturbance (i.e., greater than 1 m sq and deeper than the documented depth of previous disturbance) should be evaluated, and if the potential for significant remains exists, monitored by an archaeologist during construction.</p> <p>Per SHPO, the contractor will be required to erect an immobile hurricane-type fence around Molly Marine monument per site boundary map. A qualified arts conservator with experience in outdoor monuments will be consulted to consider any additional measures that should be taken for the Molly Marine monument prior to construction.</p> <p>An archaeologist should remain “on call” during construction on the chance that unanticipated cultural remains are encountered.</p>		
4	<p><u>Transit Route Modifications</u></p> <p>For short-term changes to bus routes during construction, information may be posted at bus stops, depending on the distance of the detour, number of stops removed from service, etc. Detours will also be placed on RTA’s website and updated weekly.</p> <p>The proposed long-term modifications to bus routes include</p>	<p>For routes permanently changed, RTA will follow standard procedures for service changes. .</p> <p>The RTA conducts triennial reviews to determine performance on all operating lines. At any point that a determination is made wherein any changes longer than 180 days to an existing route or a new route is to be</p>	RTA	Construction, Operations

	<p>integrating the existing fixed route system with the streetcar system, re-structuring local routes in the network, eliminating duplicating service and branches, creating new routes, and establishing safe transferring environments.</p> <p>Service modifications will be required to integrate the existing fixed route system into the final network.</p>	<p>established the RTA will publish notices not more than 10 days or less than 5 days of a public hearing concerning a route change or establishment. At the public hearing a presentation of any change will be made and followed up with a public comment section will be held. Any interested party has 7 days from the public hearing date to provide comments on the change. The change will then be presented to the Board of Commissioners who will then approve, or disapprove. If the Board of Commissioners approve the change and the change affects Orleans Parish the Board Adopted resolution will be submitted to the New Orleans City Council.</p>		
<p>5</p>	<p><u>Section 4(f) Resources</u></p> <p>There are three parks directly adjacent to the Loyola Avenue corridor: Elks Place Park, Cancer Survivors Park, and Duncan Plaza.</p> <p>The direct use of Cancer Survivor’s Park does not affect its use or enjoyment and is considered to be a <i>de minimis</i> impact. As such, no additional mitigation is required beyond what is proposed for the <i>de minimis</i> impact finding.</p> <p>There is no direct or constructive use of Duncan Plaza, so no mitigation is required.</p> <p>The direct use of Elk’s Plaza does not affect its use or enjoyment and is considered to be a <i>de minimis</i> impact. As such, no additional mitigation is required beyond what is proposed for the <i>de minimis</i> impact finding.</p> <p>The proposed project would also have a <i>de minimis</i> impact</p>	<p>Mitigation Required at Cancer Survivor’s Park: the RTA will remove the eight existing light poles and place the catenary support poles in the same holes. The existing poles are a sufficient distance from the monuments and columns that there will be no impacts to these by the proposed replacement centenary/light poles. Every care should be taken to minimize destruction of the surrounding foliage. The construction in the park will require permitting by the Department of Parks and Parkways and must follow the guidelines established by them.</p> <p>Mitigation Required at Elks Place Park: the RTA will leave the existing markers in place and to restore the walkway down the center of the park should be followed. The stops are designed to avoid damaging the existing oak trees that line the median. The Elk’s Place</p>	<p>RTA</p>	<p>Final Design, Construction</p>



	<p>on Section 4(f) historic sites in the immediate area of the project.</p>	<p>Park Station Stop should be coordinated with the City of New Orleans Department of Parks and Parkways at 60%, 90% and 100% design stages, so that the impact to trees may be avoided. The construction in the park will require permitting by the Department of Parks and Parkways and must follow the guidelines established by them.</p>		
<p>6</p>	<p><u>Hazardous Materials</u> A Phase I Environmental Site Assessment (ESA) of the project area concluded that the Union Passenger Terminal within the Project limits is a potential source of contamination. Instead of a Phase II Site Assessment, Environmental Construction Monitoring (ECM) will be implemented, along with a Soil Management Plan or Contaminated Media Management Plan (CMMP). The RTA's responsibility for remediation costs is governed by Louisiana Revised Statute 30:2286.1, which outlines the submission and approval of a voluntary remedial action plan that will be approved by the Louisiana Department of Environmental Quality (LDEQ).</p>	<p>During Final Design, the RTA will develop a soil management plan also referred to as a Contaminated Media Management Plan (CMMP) to be implemented for construction at the New Orleans Union Passenger Terminal, and will send this soil management plan to Louisiana DEQ for final approval prior to conclusion of Final Design activities. All components of the CMMP will be written in accordance with state, local and federal guidelines including Part 40 of the Code of Federal Regulations (CFR) 260-268, and 29 CFR 1910.120. Consultation with the Louisiana DEQ in August, 2010 has resulted in the following procedures that must be followed during construction: RTA must test excavated soil from the NOUPT site. The excavated soil must be stored in rolloff boxes, and hazardous waste characterization and testing must be performed. Testing must be performed on a composite sample from the rolloff box and consist of at least the characteristically hazardous waste tests of reactivity and toxicity characteristics</p>	<p>RTA, LA DEQ</p>	<p>Final Design, Construction</p>

		<p>based on the Toxicity Characteristic Leaching Procedure, Method 1311.</p> <p>Should test results indicate the presence of contaminants, the RTA must use these results to obtain disposal authorization from the proposed receiving landfill.</p> <p>Based on the need to test the excavated soil prior to disposal, the Louisiana DEQ has determined that if any of the excavated soils are determined to be hazardous waste, confirmatory samples from the excavation/construction area would need to be taken and compared to the Risk Evaluation/Corrective Action Program (RECAP) standards, which are based on total analyses, rather than leachate analyses. If results are above the limiting RECAP standards, the Louisiana DEQ will require delineation and evaluation of the site.</p>		
7	<p><u>Traffic and Transportation Impacts</u></p>	<p>The RTA will prepare implement a traffic control plan with input from the City of New Orleans Department of Public Works (DPW), and will include on-going coordination efforts between the city and residents and businesses before, during, and after construction.</p> <p>Modification of the traffic signal at the intersection of Loyola Avenue and Howard Avenue to signalize the inbound and outbound streetcar movement from the NOUPT. The insertion of a separate transit phase will be necessary to accommodate safe movement of</p>	RTA, DPW	Final Design, Construction, and Operations

		<p>the streetcar across the intersection.</p> <p>Restriping of the northbound and southbound approaches to the intersection of Loyola Avenue and Common Street to provide one left turn lane and two through lanes. In addition, the signal timing and phasing will need to be modified to provide permitted/protected northbound and southbound left turns with lead-lag operation.</p> <p>Restriping of the northbound approach to the intersection of Elk Place and Canal Street to provide an exclusive streetcar lane and three through lanes. The restriping will require the relocation of the existing near side bus stop on this approach. In addition, the insertion of a separate transit phase in the signal will be necessary to facilitate the inbound and outbound streetcar movements.</p> <p>The insertion of a separate transit phase in the signal at the intersection of Canal Street and Rampart Street will be necessary to facilitate inbound and outbound streetcar movements.</p>		
8	<p><u>Safety- Specific Locations</u></p> <p>Whenever possible, the RTA will design pedestrian paths to avoid crossing or passing through streetcar tracks, vehicular access drives, and parking areas.</p>	<p>RTA will identify where pedestrian crossings occur and will mark them with standard pavement markings and signs. Sight distance at crosswalks, intersections, and streetcar crossings will conform to AASHTO Guidelines.</p>	RTA	Final Design, Construction

<p>9</p>	<p><u>Station Safety</u> The RTA will design the project to provide good visibility to the public and incorporates <u>Crime Prevention through Environmental Design</u> (CPTED) guidelines. Several design features will intend to enhance safety and security, including open visibility to station platforms, security lighting, motion-sensor lighting, wayfinding signage, context-sensitive seating and other passenger amenities will be incorporated into project design.</p>	<p>RTA will utilize the CPTED guidelines as the basis of the final design of the station stops to include: security lighting, motion sensing light. These will be reviewed through the Fire Life Safety Committee as well as the ADA coordinator.</p>	<p>RTA</p>	<p>Final Design</p>
<p>10</p>	<p><u>Safety – Project Level</u> Develop System Safety Certification Plan RTA Transit Police Unit (TPU) will be responsible for 24-hour daily patrol of the line and project materials and conduct area walk-throughs.</p>	<p>RTA with the final design consultant team and construction management team will prepare and complete the Safety Certification Plan at the completion of the 90% design for the project. The Fire Life Safety committee, Transit Police as well as coordination with other City of New Orleans agencies will be kept appraised and included in the final design through construction.</p>	<p>RTA</p>	<p>Final Design</p>
<p>11</p>	<p><u>Utilities</u> Best management practices will be used to maintain availability of necessary utilities during construction.</p>	<p>Existing utility locations will be surveyed and marked in the project area.</p>	<p>RTA</p>	<p>Final Design, Construction</p>
<p>12</p>	<p><u>Construction Impact (Vibration)</u></p>	<p>Vibration monitoring will be performed by a qualified vibration professional at UPT, Molly Marine, and other monuments located at Elks Place Park during construction. If instantaneous vibration levels exceed a peak particle velocity of 0.12 in/sec (equivalent to an rms vibration velocity of 90 VdB), the contractor will be required to stop construction immediately and will not be allowed to</p>	<p>RTA</p>	<p>Construction</p>

		<p>continue construction until lower-vibration procedures are implemented.</p> <p>The RTA will employ the use of alternative construction procedures to minimize and/or avoid vibration impacts to sensitive structures. These construction procedures could include use of a non-vibrating or sheepsfoot type of roller compactor, including the use of lime or cement stabilization if deemed necessary by the contractor, or recommended by the geotechnical consultant upon review of soil samples. This would be used in place of a vibratory roller. As an alternative to the use of hoe rams, the contractor may sawcut the pavement into pieces and thereby complete extraction of the pavement by lifting with a front-end loader. Cast-in-place drilled shafts may be used as an alternative to pile drivers.</p>		
13	<u>Construction Impact (Noise)</u>	<p>A Noise &amp; Vibration Control Plan for construction will be developed to mitigate potential construction noise impacts at the sensitive receivers.</p> <p>The contractor will be required to implement noise mitigation measures such as use of effective mufflers and installation of temporary sound walls whenever construction will be within 300 ft of sensitive receptors. When construction noise with mitigation will exceed 60 dBA Leq at sensitive receivers or construction activities are planned within 50 ft of the sensitive receivers, the contractor will be</p>	RTA	Final Design, Construction

		required to obtain exemptions from the daytime construction noise limits.		
14	<u>Construction Impact (Air Quality)</u>	<p>Good housekeeping practices, such as wetting or chemically treating exposed earth areas, covering dust-producing materials during transport, and limiting construction activities during high wind conditions, will be employed, to minimize dust impacts.</p> <p>Proper traffic management during the construction period will be implemented to mitigate potential adverse effects, or increases in CO concentrations.</p> <p>RTA will establish staging areas and worker parking located away from sensitive receptors.</p>	RTA	Construction
15	<p><u>Construction Impact (Water Quality and Runoff)</u></p> <p>The RTA's Final Design Consultant will prepare an Erosion and Sediment Control Plan (E&amp;SCP) as part of a "baseline" Storm Water Pollution Prevention Plan (SWPPP) that complies with the requirements of the relevant Storm Water Discharge Construction General Permit. This baseline SWPPP will be included as part of the Project's bid documents (drawings and specifications).</p>	<p>The SWPPP will define and ensure the implementation of practices that will be used to reduce pollutants in storm water discharges associated with construction activity at the construction site, and assure compliance with the terms and conditions of the permit.</p> <p>If unanticipated sources of hazardous or regulated materials were encountered during construction activities, the construction manager or designee will immediately notify RTA. Specific mitigation activities, which address the type, level, and quantity of contamination encountered, will be immediately implemented. The handling, treatment, and disposal of any hazardous materials will occur in full compliance with Federal, state, and local requirements.</p>	RTA	Final Design, Construction

<p>16</p>	<p><u>Construction Impacts (Safety and Security)</u>          The contractor will be required to be familiar with and comply with applicable Federal, state, and local laws, ordinances, and regulations regarding safety and security during construction.</p>	<p>RTA will facilitate pedestrian safety in the vicinity of construction activities through the use of temporary construction fencing and barricades around the construction sites. Access into the construction sites will be controlled.          Some construction will require temporary detours or reduced roadway capacity. Traffic safety maintenance measures will be employed to minimize this risk.</p>	<p>RTA</p>	<p>Construction</p>
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**EA Comments and Responses**

ID #	Name	Contact Method	Summary of Comment	
<b>PUBLIC COMMENTS</b>				
1	Scott Graves	Email to RTA 10/10/10	What about the extension of the Riverfront Streetcar up Elysian Fields and the St. Claude/N. Rampart lines?	Environmental Assessments for the French Quarter to Press St and Elysian Fields extension to the Riverfront Line are under development. Environmental Assessment public comment periods will be held in Spring 2011.
2	James Guilbeau Sierra Club New Orleans Group, Delta Chapter PO Box 19469 New Orleans, LA 70179-0469	Letter to RTA 11/8/10	<p>1. Commented about eliminated alternative route (Howard Avenue to Loyola Avenue).</p> <p>2. Commented that the St. Charles route is listed on the National Register of Historic Places, however, this does not preclude “the permanent and regular operation of non-historic cars in revenue service” on the St. Charles Street (as contrasted with the St. Charles Avenue median).</p>	<p>1. The Lee Circle Connection alternative was considered during the Alternatives Analysis project phase, which was conducted September 2008 to June 2009. This alternative was eliminated because of the cost to relocate a utility vault in the median, possible traffic operations conflicts, and the possible conflict to tie new service into the St. Charles Streetcar Line. See New Orleans CBD/French Quarter Alternative Analysis, page 67 at <a href="http://www.norta.com">www.norta.com</a>.</p> <p>2. There may be possible Section 106 impacts with tying in new service to the St. Charles Streetcar Line. This possibility needs to be researched with the Louisiana State Historic Preservation Officer.</p>



<p>3</p>	<p>Jacquelyn Brechtel Clarkson, Councilmember-at-Large</p> <p>Susan Guidry Councilmember, District A</p> <p>Stacy Head Councilmember, District B</p> <p>Kristin Gisleson Palmer Councilmember, District C</p> <p>City of New Orleans City Hall, Suite 2W5D New Orleans, LA 70112</p>	<p>Letter to RTA 11/11/10</p>	<p>The submitted Draft Environmental Assessment does not consider the two priorities indentified by the Committee at its hearing, namely:</p> <ol style="list-style-type: none"> <li>1. the drop of a traffic lane along the route and its reservation for streetcars and emergency vehicles,</li> <li>2. realignment of the tracks to be built in the third phase of the project, so that instead of terminating on the Earhart side of the UPT, the line would pass between the UPT Baggage Building and the Loyola Avenue Post Office.</li> </ol> <p>We further submit the detailed comments enclosed as those of the New Orleans City Council's Ground Transportation Committee:</p> <ol style="list-style-type: none"> <li>1. The current track alignment is inconsistent</li> </ol>	<ol style="list-style-type: none"> <li>1. In a coordination meeting on April 14, 2010 with the City of New Orleans, it was agreed that the RTA would proceed with its current design, and that prior to any decision to dedicate a traffic lane to streetcar operations that would remove a traffic lane on Loyola Avenue or N. Rampart/St. Claude Avenue, the City of New Orleans would embark on an area-wide traffic study to encompass the Central Business District to determine whether the loss of a travel lane due to potential dedication of a streetcar-only lane would impact traffic operations. The meeting summary and attendees can be found in Appendix I of the EA.</li> <li>2. The RTA is working to finalize a Cooperative Endeavor Agreement with the City of New Orleans, the New Orleans Building Corporation, and the Regional Transit Authority for the use of the southern side of the New Orleans Union Passenger Terminal site for a streetcar access, eight (8) bus bays with two (2) passenger platforms, four (4) Ready Bus bays, passenger canopies and revisions to existing parking lot fixtures and driveway cuts. The location of the UPT bus/streetcar transfer facility and its use will be finalized through a Cooperative Agreement and Servitude Agreement.</li> </ol>
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			<p>with policies of The Plan/or the 21" Century: New Orleans 2010 (The Master Plan). Where the Master Plan supports the extension of NOUPT Loyola lines, it does not support the current design.</p> <p>2. The project must comply with the "Best Practices of Public Transit" as described in the Master Plan. Point 1 in the best practices checklist box of the Master Plans transportation chapter encourages, whenever possible, that "rail and BRT cars travel in a reserved, dedicated right-of-way or enhanced median with minimal crossings." RTA's plan provides for neither, though the alternative of a dedicated right-of-way could be accomplished with minimal difficulty.</p>	<p>1. The NOUPT/Loyola Avenue Streetcar project has been under study and development since 2008. The Master Plan was adopted in August 2010 and at that time this project was already at 60 percent design. Further, Part 1 of the Master Plan, entitled, "The Force of Law" notes that enforcement specifically concerns land use. This chapter notes, "The Master Plan does not directly govern capital investments made by the state or federal governments, though they typically will consult with local government to make projects consistent with the Master Plan". RTA has consulted with the City Planning Commission, Department of Public Works, and Parks and Parkways departments of the City of New Orleans throughout the project development process. Appendix I includes letters of project concurrence from the above listed city departments.</p> <p>2. The NOUPT/Loyola Avenue Streetcar project has been under study and development since 2008. The Master Plan was adopted in August 2010 and at that time this project was already at 60 percent design. Further, Part 1 of the Master Plan, entitled, "The Force of Law" notes that enforcement specifically concerns land use. This chapter notes, "The Master Plan does not directly govern capital investments made by the state or federal governments, though they typically will consult with local government to make projects consistent with the Master Plan". RTA has consulted with the City Planning</p>
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			<p>3. The EA contains several inaccurate representations, particularly relating to the Master Plan and the proposed draft Comprehensive Zoning Ordinance (CZO). The EA repeatedly suggests a level of coordination with the City Planning Commission staff that did not occur. The RTA cannot self-certify compliance with the Master Plan.</p> <p>4. Failure to comply with the guidelines of the Master Plan could result in litigation by citizen participants, which could cause significant delays or result in the need to start the process over again.</p>	<p>Commission, Department of Public Works, and Parks and Parkways departments of the City of New Orleans throughout the project development process. Appendix I includes letters of project concurrence from the above listed city departments.</p> <p>3. The RTA received a letter of support dated February 25, 2010 for the streetcar program, from the City Planning Commission, signed by Ms. Yolanda Rodriguez. This letter is in the EA Appendix I, along with other letters of support.</p> <p>4. The NOUPT/Loyola Avenue Streetcar project has been under study and development since 2008. The Master Plan was adopted in August 2010 and at that time this project was already at 60 percent design. Further, Part 1 of the Master Plan, entitled, "The Force of Law" notes that enforcement specifically concerns land use. This chapter notes, "The Master Plan does not directly govern capital investments made by the state or federal governments, though they typically will consult with local government to make projects consistent with the Master Plan". RTA has consulted with the City Planning Commission, Department of Public Works, and Parks and Parkways departments of the City of New Orleans throughout the project development process. Appendix I includes letters of project concurrence from the above</p>
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			<p>5. The RTA and its consultant team repeatedly discounted/ignored valuable public input throughout the public participation phase of the project. Unfortunately, the project as designed and further described in the EA does not address many issues previously raised by interested stakeholders in the scoping process.</p> <p>6. The RTA continues to advance a singular alignment rather than considering alternative alignment options. Failure to assess other alternatives, as is best practice and required</p>	<p>listed city departments. The RTA has consulted with interested parties through the conduct of the Public Involvement Program; the public outreach activities are summarized in Appendix F of the EA, "Public Involvement Program Summary Report." The RTA has responded to every written comment received. These comments and responses are noted in the Environmental Assessment in Appendix F.</p> <p>5. The RTA has responded fully to each question, comment, and suggestion raised by the community. These written responses are presented in the EA Chapter 5, in Appendix F of the EA and letters of concurrence from permitting and regulatory agencies are contained in Chapter 4 of the EA. RTA has responded to requests for speedier travel by reducing the number of stops of the NOUPT/Loyola Avenue Streetcar line. RTA developed an Urban Design Guideline manual to accompany this streetcar program expansion, to respond to neighborhood comments for aesthetic improvements and passenger amenities. This Urban Design Manual, found in Appendix A of the EA, is also consistent and compatible with the recommendations and policies of the New Orleans Master Plan, which can be found at <a href="http://www.neworleansmasterplan.org">www.neworleansmasterplan.org</a>.</p> <p>6. RTA's Alternatives Analysis report can be found on RTA's website at <a href="http://www.norta.com">www.norta.com</a>. On June 25, 2009, the Board of Commissioners</p>
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			<p>under NEP A, ensures that additional time will be required. Failure to consider other alternatives is further inconsistent with RTA's publically stated position.</p> <p>7. The project as presently described in the EA documents is inconsistent with specific items agreed upon by the RTA, Councilmember Head, various transit activists, and concerned citizens at a Spring 2010 meeting.</p> <p>8. The stop on the Earhart side of the UPT is in</p>	<p>of the RTA adopted the recommendation for a Locally Preferred Alternative (LPA), consistent with the FTA's Project Development process. On August 11, 2009, the Transportation Policy Committee of the Regional Planning Commission for Jefferson, Orleans, Plaquemines, St. Bernard and St. Tammany Parishes adopted the LPA into the Metropolitan Transportation Plan and into the Transportation Improvement Program unanimously in a 30-0 vote. On August 6, 2009, the New Orleans City Council adopted the LPA for the New Orleans Central Business District/French Quarter Alternative study, which included the Loyola/UPT Howard Avenue project. Copies of these resolutions are included in Appendix I of the EA.</p> <p>7. In a coordination meeting on April 14, 2010 with the City of New Orleans, it was agreed that the RTA would proceed with its current design, and that prior to any decision to dedicate a traffic lane to streetcar operations that would remove a traffic lane on Loyola Avenue or N. Rampart/St. Claude Avenue, the City of New Orleans would embark on an area-wide traffic study to encompass the Central Business District to determine whether the loss of a travel lane due to potential dedication of a streetcar-only lane would impact traffic operations. The meeting summary and attendees can be found in Appendix I of the EA.</p>
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			<p>the wrong place because it cannot tie into the future West Bank, S. Claiborne, or Oretha Castle Haley/Jackson lines-its logical extensions. Even a Howard Avenue line connection would be difficult. This was not even first choice of the RTA and its consultants, but made because RTA encountered resistance from the former CEO of the New Orleans Building Corporation. His concerns were never balanced with the ecological benefits that would result from any alternative realignment.</p> <p>9. With more transit passengers boarding and exiting streetcars, Canal Street Development Corporation's argument that the RTA should avoid situating a major transit stop in the neutral ground of the 1100 block of Canal Street [between the Saenger and (Loews) State Palace Theaters] has not been seriously considered. Proposed solution: Turn the Loyola line right, or river bound, at Tulane Avenue and then left onto an enlarged S. Rampart Street neutral ground (a street configuration that was designed for the OK line years ago), which could then cross Canal into N. Rampart Street. A stop, or stops, could be put on either of these streets.</p> <p>10. Streetcars will regularly make a double, or dog-leg, turn from Elk Place to N.Rampart Street. Turning into the Canal St. line tracks is an acute tum which: 1) causes excessive wear to tracks and switches, and 2) causes excessive wear to the new streetcars' steel tires.</p>	<p>8. The RTA is working to finalize a Cooperative Endeavor Agreement with the City of New Orleans, the New Orleans Building Corporation, and the Regional Transit Authority for the use of the southern (Earhart) side of the New Orleans Union Passenger Terminal site for a streetcar access, eight (8) bus bays with two (2) passenger platforms, four (4) Ready Bus bays, passenger canopies and revisions to existing parking lot fixtures and driveway cuts. The location of the UPT bus/streetcar transfer facility and its use will be finalized through a Cooperative Agreement and Servitude Agreement.</p> <p>9. No additional streetcar stop is planned for this Theatre District vicinity. The RTA design plans do not include a new transfer stop on Canal Street.</p> <p>10. The alignment characteristics require that the streetcar travel from Canal St. to Loyola Ave will be accommodated through two switches and pre-curved track that has been custom-designed for this alignment. The curve characteristics are well within the design criteria for the vehicle</p>
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			<p>11. The Loyola Streetcar extension must be a sensational success by all measures with expedited construction, at or below project costs, with fast and efficient operations. It must serve as a model for new streetcar projects undertaken by the City, the RTA, and the citizens of New Orleans in the second decade of the 21st century.</p> <p>12. The RTA seems to intend to achieve the appearance of success by making some Uptown, all Westbank, and the Airport line bus passengers have to transfer at the UPT to get to Canal Street. We need to achieve success by other more</p>	<p>turn radius. In fact, the switches utilized in the design are normally installed on light rail installations. Maintenance of the track appliances for wear as well as rail/wheel interface were taken into consideration, and duplicates the design that exists throughout the streetcar system.</p> <p>The alignment at this location has been designed to allow for smooth operation of the streetcar vehicles at low speed to minimize wear on both the track and the vehicles tires. No excessive wear is expected on the rail or the vehicle tires at this location due to the reverse turning movement.</p> <p>11. The Department of Transportation's Transportation Investment Generating Economic Recovery (TIGER) Discretionary Grant Program was included in the Recovery Act will require that the project be built within budget and in a timely manner to create jobs and grow the economy. The RTA's construction project cannot exceed the \$45 Million grant award. The project as designed can be built on schedule and within budget, and will operate as a model for new streetcar projects in the City of New Orleans, with state-of-the-art passenger amenities.</p> <p>12. RTA plans to make revisions to the service plan in the summer of 2011 and schedule for public hearings for the service plan in autumn of 2011. The NOUPT/Loyola Avenue line does not</p>
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			<p>straightforward means. If we could eliminate the custom-designed and custom-built transit shelters, we could use that and other realized savings to build the Howard Ave. connection at the outset. At this point, the Superdome and the New Orleans Arena are much more highly used destinations than the UPT. Being able to divert some St. Charles streetcars to a Dome/Arena stop would make the Loyola project much more successful.</p> <p>13. The Loyola Streetcar should pass between the UPT Baggage Building and the Loyola Avenue Post Office (41ft. width), with one stop sheltered by the existing UPT overhang and the other side having a new, small, off-the-shelf shelter with room for a major pedestrian plaza/walkway on that side. From there, the tracks should continue to the side of the New Orleans Arena for a Dome/Arena stop. With this configuration, the tracks could eventually continue onto a ramp crossing the UPT tracks and connect with the HOV/ Transit lanes of the Crescent City Connection, when the Westbank Streetcar line is built. A half- grand junction could be constructed at Loyola and Howard Avenues, going in both directions on Howard to the neutral ground and to the UPT and Arena.</p> <p>14. Two items in the best practices checklist box of the Master Plan's transportation chapter dictate that the UPT stop should be on the Howard Avenue side of the UPT. First, Point 8 provides that "assuring that new routes have good connections to existing city wide systems and regional connections" is critical. Second, Point 10 provides transit planning "requires [a] coordinated planning approach that includes</p>	<p>preclude the future extension to Howard Avenue, if deemed to be technically feasible and if it does not affect the eligibility of the St. Charles streetcar on the National Register, and if funding is identified for the project.</p> <p>13. The RTA is working to finalize a Cooperative Endeavor Agreement with the City of New Orleans, the New Orleans Building Corporation, and the Regional Transit Authority for the use of the southern side of the New Orleans Union Passenger Terminal site for a streetcar access, eight (8) bus bays with two (2) passenger platforms, four (4) Ready Bus bays, passenger canopies and revisions to existing parking lot fixtures and driveway cuts. The location of the UPT bus/streetcar transfer facility and its use will be finalized through a Cooperative Agreement and Servitude Agreement.</p> <p>14. The transit lanes on the Crescent City Connection should not be affected by the NOUPT/Loyola Avenue streetcar project. The NOUPT/Loyola Avenue project supports the goals of the recently adopted New Orleans Master Plan, promoting the downtown, diverse</p>
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			<p>City and community input, advocacy for funding, and step by step implementation." The transit lanes on the Crescent City Connection, as planned, were intended to ascend and descend the bridge to Loyola Avenue before proceeding to Canal Street. Connecting these two transit elements are part of a planned "city wide system" with "regional connections" following a "coordinated planning approach and step by step implementation."</p>	<p>modes of transportation, and preservation of the historic character. As designed, the project would increase the connectivity to Canal Street.</p>
4	<p>Jack Stewart, President Lafayette Square Association 630 Julia Street New Orleans, LA 70130</p>	<p>Letter to RTA 11/11/10</p>	<p>1. The "alternative" being presented for review (of which there is only one and therefore is not an alternative) has a major environmental impact. It is in violation of the Best Practices for Rail and BRT Transit as spelled out in a very clear manner in the Transportation Chapter of the Master Plan for the City of New Orleans.</p>	<p>1. The RTA has followed the FTA's project development process, which consists of the completion of a planning Alternatives Analysis (AA), and selection of a single "build" alternative that would be documented as the recommendation for a Locally Preferred Alternative (LPA). RTA's Alternatives Analysis report can be found on RTA's website at <a href="http://www.norta.com">www.norta.com</a>. Throughout the AA and the NEPA process, the alternatives are compared to an established "no action" or "no build" alternative, as well as a transportation systems management alternative, that consists of improvements that can be implemented without construction of a new fixed guideway facility.</p> <p>On June 25, 2009, the Board of Commissioners of the RTA adopted a LPA, consistent with the FTA's Project Development process. On August 11, 2009, the Transportation Policy Committee of the Regional Planning Commission for Jefferson, Orleans, Plaquemines, St. Bernard and St. Tammany Parishes adopted the LPA into the Metropolitan Transportation Plan and into the Transportation Improvement Program</p>

			<p>2. Many alternatives were suggested by many different stakeholders during the series of meetings that were held over the past months. At</p>	<p>unanimously in a 30-0 vote. On August 6, 2009, the New Orleans City Council adopted the LPA for the New Orleans Central Business District/French Quarter Alternative study, which included the Loyola/UPT Howard Avenue project. Copies of these resolutions are included in Appendix I of the EA.</p> <p>Regarding the comment related to the Best Practices of the New Orleans Master Plan, please note that the Master Plan was adopted in August 2010 and at that time this project was already at 60 percent design. Further, Part 1 of the Master Plan, entitled, “The Force of Law” notes that enforcement specifically concerns land use. This chapter notes, “The Master Plan does not directly govern capital investments made by the state or federal governments, though they typically will consult with local government to make projects consistent with the Master Plan”.</p> <p>RTA has consulted with the City Planning Commission, Department of Public Works, and Parks and Parkways departments of the City of New Orleans throughout the project development process. Appendix I includes letters of project concurrence from the above listed city departments.</p> <p>2. The RTA reviewed several alternatives during the AA, including an alternative on S. Rampart Street, which does not have sufficient right-of-way to accommodate new streetcar service</p>
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		<p>least two of these would not have been in violation of the Master Plan had they been considered: 1) a S. Rampart St. alignment running down a transit-only mall street, which formerly had streetcar operation in both directions, existing light standard poles that previously held trolley wires, a significant lack of underground utility vaults, and a graded street elevation perfect for re-installation of streetcars and 2) a Loyola alignment that could have easily avoided the dedicated park problems by narrowing the very wide automobile lanes and the Cancer Survivors Park, and avoiding the Bicentennial Park by turning at Tulane Ave. into the wide 100 block of S. Rampart St. Because these were not even slightly considered as alternatives, we are now having a review of a “no alternatives” alternative, which as presented in the EA is in violation of the Master Plan.</p> <p>3. Why were these repeated suggestions ignored when they were suggested so often and could have created alternatives that were in not in violation of the Master Plan, and, in the case of the S. Rampart St. alternative, considerably cheaper? How did this happen, especially since this planning effort was supposed to have been a planning process done according to FTA standards as outlined in a recent FTA Webinar that I participated in?</p>	<p>without causing removal of on-street parking and property impacts. Splitting the streetcar onto two parallel streets would increase construction costs. Thus it was not developed as a viable option. See New Orleans CBD/French Quarter Alternative Analysis, page 67 at <a href="http://www.norta.com">www.norta.com</a>.</p> <p>The NOUPT/Loyola Avenue Streetcar does NOT affect the dedicated parks in the median. The <u>finding of no adverse effect</u> is documented in letters from the City of New Orleans Parks and Parkways, Louisiana State Historic Preservation Office (SHPO) and the National Park Service in Appendix B “Section 4(f) Statement” and Appendix I of the EA</p> <p>3. The RTA and its consultant team have responded fully to each question, comment, and suggestion raised by the community. These written responses are presented in the EA Chapter 5, in Appendix F of the EA and letters of concurrence from permitting and regulatory agencies are contained in Appendix I of the EA.</p>
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