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of Transportation
**Federal Transit
Administration**

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September 11, 2026

Sharyn LaCombe, Senior Director
MetroRapid BRT Planning & Design, Cincinnati Metro
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RE: Environmental Review Approval for SORTA's Reading Road Bus Rapid Transit Project

Dear Sharyn:

The Federal Transit Administration (FTA) has evaluated environmental review documents submitted by the Southwest Ohio Regional Transit Authority (SORTA) for the proposed Reading Road Bus Rapid Transit (BRT) project. FTA finds that the project meets the criteria for a National Environmental Policy Act (NEPA) categorical exclusion in accordance with 23 CFR § 771.118(c)(9) - Assembly or construction of facilities that is consistent with existing land use and zoning requirements (including floodplain regulations) and uses primarily land disturbed for transportation use, such as: Buildings and associated structures; bus transfer stations or intermodal centers; busways and streetcar lines or other transit investments within areas of the right-of-way occupied by the physical footprint of the existing facility or otherwise maintained or used for transportation operations; and parking facilities. The project will be an undertaking requiring federal approval.

The Southwest Ohio Regional Transit Authority (the grantee) is proposing a 9.2-mile Reading Road BRT with 13 stations that will connect the Cincinnati Riverfront (The Banks) and the downtown with the University of Cincinnati in Uptown and destinations north on Reading Rd to the northern terminus in Roselawn. The project will utilize a mixture of dedicated bus lane configurations to provide service along the route. Stations will feature improved bicycle and pedestrian facilities, raised platforms for level boarding, shelters, and real-time information and fare payment infrastructure. The project will also include the acquisition of 12 new 60-foot articulated buses.

The environmental records reviewed by FTA consisted of a Documented Categorical Exclusion (DCE) checklist dated August 2026, and additional supporting information. On November 22, 2024, in accordance with 36 C.F.R. Part 800 – Protection of Historic Properties and the National Historic Preservation Act (NHPA), FTA provided the Ohio State Historic Preservation Office (SHPO) with the Area of Potential Effect (APE). On November 12, 2025, FTA provided the National Register of Historic Properties (NRHP) eligibility determinations; and an effects assessment finding of No Adverse Effects to SHPO. Additional information was provided to

Environmental Review Approval for SORTA's Reading Road Bus Rapid Transit Project

SHPO on April 17, 2026. The SHPO provided its concurrence in correspondence on May 15, 2026.

The use of any Federal funds for this project is contingent upon further review and approval by FTA is any of the following conditions arise:

- Discovery of cultural artifacts
- Discovery of prehistoric or historic archaeological artifacts or human remains during construction, demolition, or earthmoving activities; and
- Encounter hazardous materials.

This NEPA determination applies only to the proposed project as described in the DCE checklist and supporting materials. Any changes to the proposed project which could result in significant environmental impacts not outlined in the DCE checklist, including the disclosure of new information or previously unidentified environmental concerns, will require a re-evaluation of this proposed project under NEPA.

This confirmation of a categorical exclusion does not provide FTA commitment that future Federal funds will be approved for this proposed project. Any costs incurred under FTA pre-award authority must meet all Federal requirements prior to those costs being incurred in order to retain eligibility of those costs for future FTA grant assistance.

If you have further questions regarding this determination, please contact Anshu Singh at 312-353-4344 or anshu.singh1@dot.gov.

Sincerely,

**ANTHONY WILLIAM
GREEP**

Anthony W. Greep
Director, Office of Planning & Program Development

 Digitally signed by ANTHONY
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cc: Susan Weber, FTA
Anshu Singh, FTA
Dan Digiuseppe, FTA



Metro Rapid: Reading Road Bus Rapid Transit Project

Final Documented Categorical Exclusion

September 2026



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A. Project Description

After a multi-year process of community input on corridor locations, station design, and infrastructure, Cincinnati Metro (Metro) introduced a Bus Rapid Transit (BRT) system: Metro Rapid. The approximately 9.2-mile Metro Rapid Reading Road BRT Project (Project) will be the first BRT corridor implemented in the Metro service area and will connect the Cincinnati Riverfront (The Banks) and the downtown with the University of Cincinnati in Uptown and destinations north on Reading Road to the northern terminus in the Roselawn neighborhood (Figure 1 and Appendix A). Uptown is a collection of neighborhoods immediately north of downtown, roughly between Interstate I-71 and I-75.

BRT vehicles will carry passengers between 13 stations and riders will have access to the converging Metro routes in downtown Cincinnati where timed transfers take place at the Government Square transit hub. In addition, riders will be able to connect to the City of Cincinnati Connector (streetcar), connect to many of the Transit Authority of Northern Kentucky (TANK) bus routes, and TANK's Southbank Shuttle that circulates amongst the Cincinnati, Covington, and Newport downtown business districts and the riverfront entertainment and sports venues.

Moving north, the Project will serve The Banks and portions of the central business district, popular Over-the-Rhine and Findlay Market destinations on the north side of the downtown Cincinnati and then proceed up Vine Street to provide service to the University of Cincinnati, the Corryville neighborhood, and the Uptown District. The Uptown District includes several key transit generators, including the Cincinnati Veteran Affairs Medical Center, University Hospital, and Cincinnati Children's Hospital. As the route continues north, the Project will serve the dense urban neighborhoods in Avondale, North Avondale, Paddock Hills, Bond Hill, and Roselawn.

For transit, Reading Road is the main north-south travel route and most heavily used corridor in Hamilton County. Eleven fixed-route bus routes, including one limited-stop "MetroPlus" route, are currently active in the Project corridor. Route 43, which primarily operates on Reading Road, is currently the highest ridership fixed route in the Metro local route system. BRT service will introduce more frequent trips to popular stops, while its legacy bus routes will ensure local service continues.

The Project is proposed to share a partial alignment with the Metro Rapid Hamilton Avenue BRT Project, another project under consideration for funding through Small Starts, between The Banks and the University of Cincinnati, where the alignments are proposed to split. The Hamilton Avenue BRT Project, which is currently planned to be completed after the Project, will continue from the University of Cincinnati to the Northside Transit Center and then further north to the Hilltop Plaza terminus and will be funded and evaluated independently under the National Environmental Policy Act, as amended.

The Project will utilize a variety of dedicated bus lane configurations to facilitate rapid and reliable service along the route. From The Banks to the University of Cincinnati, a distance of approximately 3 miles, there will be a mix of business access & transit (BAT) lanes, a shared transit lane with the Cincinnati Connector (streetcar), and a mixed traffic lane up the Vine Street hill. The 6.2 miles north of the University of Cincinnati to the Roselawn terminus will operate in BAT or mixed traffic lanes (Figure 2).

Project stations will feature improved bicycle and pedestrian facilities, raised platforms for level boarding, shelters, and real-time information and fare payment infrastructure. The Project will also include the acquisition of 12 new, 60-foot articulated clean diesel BRT vehicles, including ten vehicles for peak service and two spares.

Figure 1. Reading Road Project Map: Alignment and Stations

READING ROAD BRT

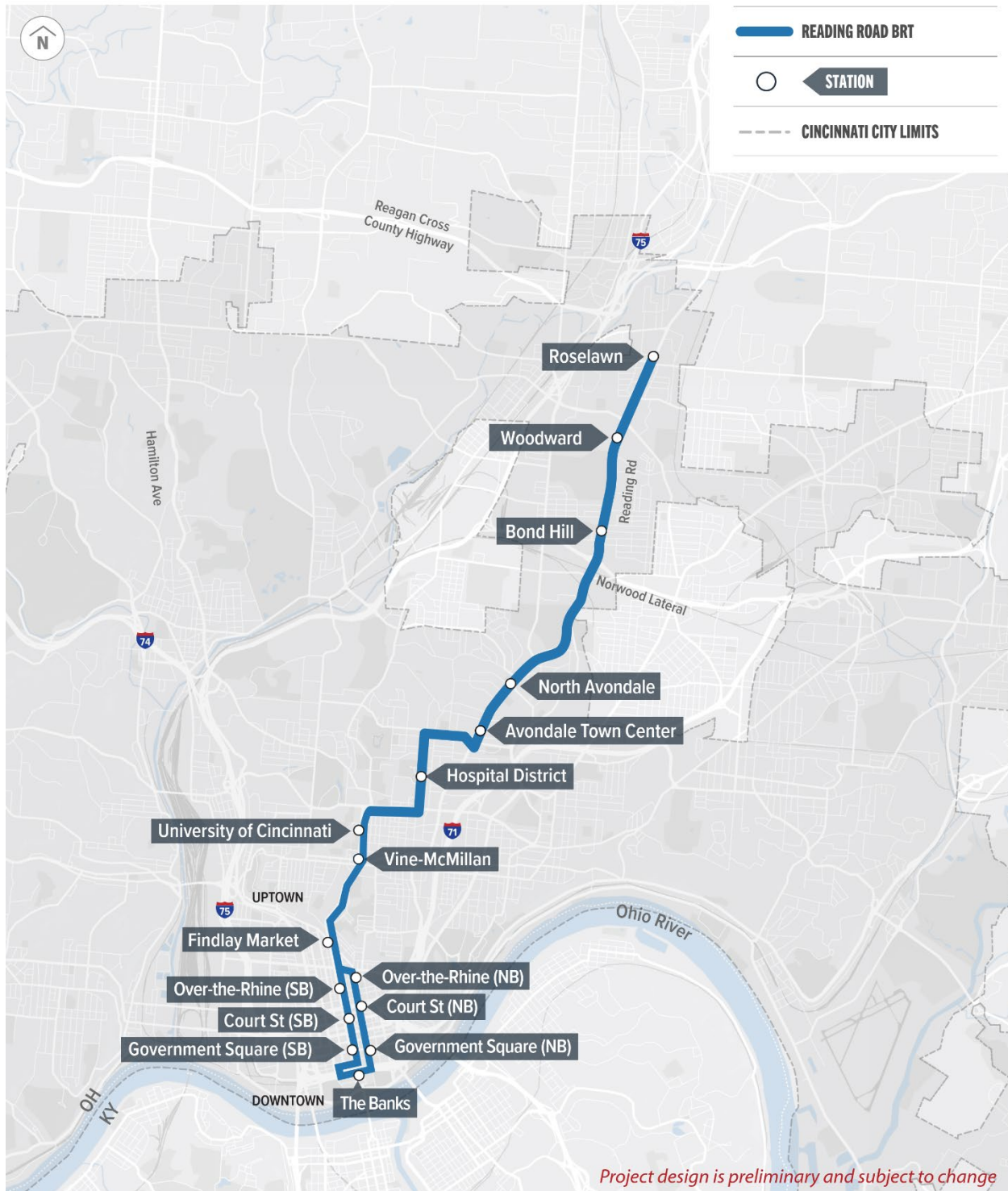
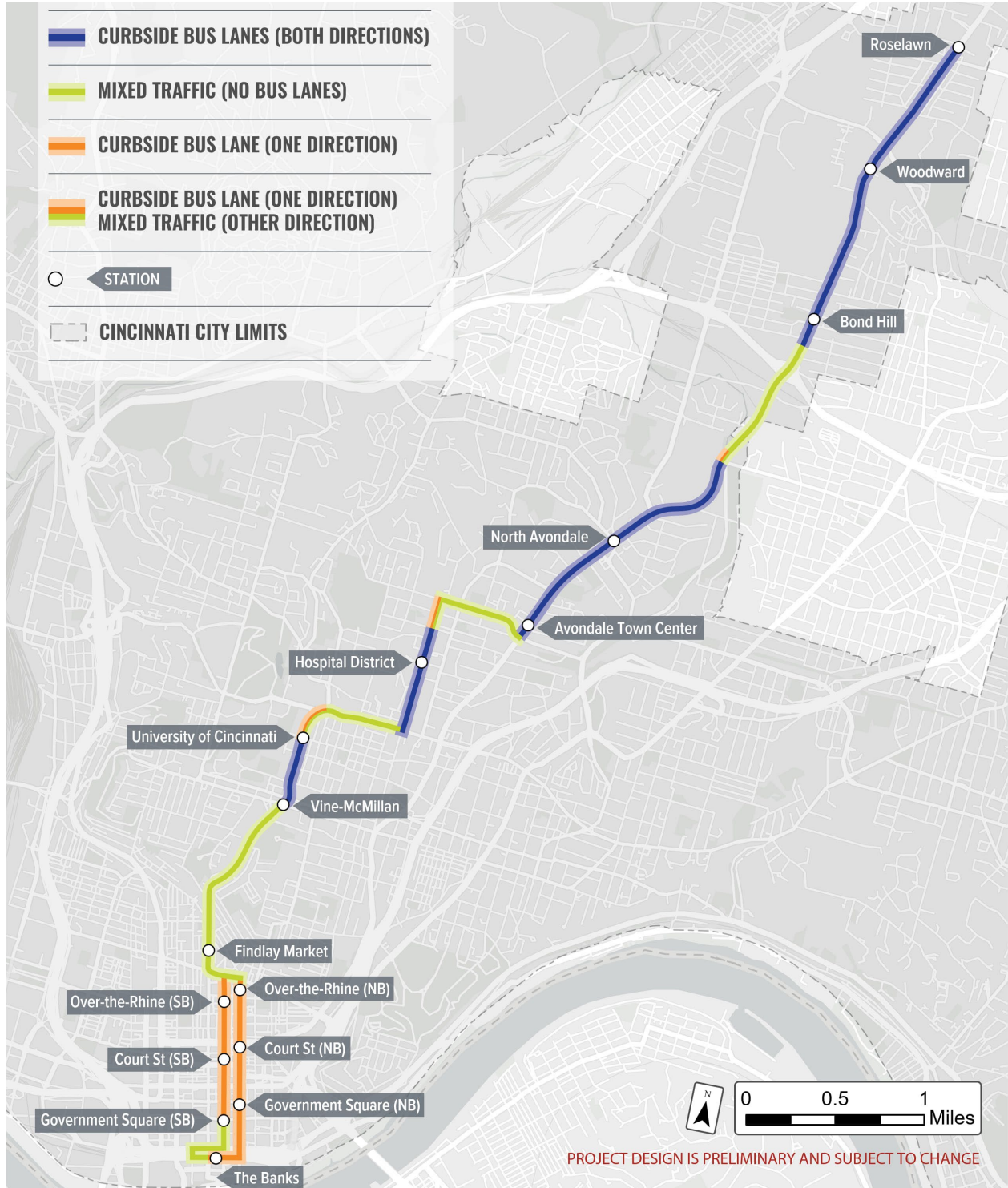


Figure 2. Reading Road Alignment Configuration



I. BRT Operations and Lane Configurations

The Project will operate seven days per week for 20 hours per day, between 5:00 am and 1:00 am. Service frequency includes:

- 20 minutes between 5:00 AM – 6:00 AM
- 10 minutes between 6:00 AM – 8:00 PM
- 15-30 minutes between 8:00 PM – 1:00 AM
- 15-30 minutes on weekends and Holidays

The BRT vehicles will be low-floor, articulated clean diesel buses. These vehicles will feature low floors and be designed to facilitate precision docking at stations which will help minimize the amount of time needed for boarding and alighting. They will further accommodate high passenger loads, wheelchair positions, and on-board bike storage.

II. Stations

Table 1 presents the station locations for the Project, listed from south to north. Where BRT service operates on one-way paired streets (Walnut and Main streets in downtown Cincinnati and Over-the-Rhine), the separate northbound and southbound platforms are denoted but for the purpose of tabulating the number of stations along the Project, the paired locations are treated as one station.

Station typologies are groupings of stations that share common characteristics. These groupings allow for the development of policies that address the needs of each station area. During the development of station locations and typologies, the design team reviewed numerous characteristics of the Project corridor, including:

- Community and stakeholder engagement
- Environmental reviews
- Station design requirements
- Safety analysis
- Systems and signalization
- Parking analysis
- Zoning districts
- Physical constraints and utilities

As a result, Project designers sought to develop typologies that accommodate the setting around each station area and minimize the feeling of intrusion into the area. Additionally, station platform design elements are based on characteristics of the John A. Roebling Suspension Bridge, an iconic structure over the Ohio River within the region.

Table 1. Metro Rapid Reading Road BRT Station Locations (south to north)

Station	Street	Cross Street
The Banks	Second Street	Between Vine and Walnut streets
Government Square Southbound/ Government Square Northbound	Walnut Street/ Main Street	5 th Street/ 6 th Street
Court Street Southbound/ Court Street Northbound	Walnut Street/ Main Street	9 th Street/ 9 th Street
Over-the-Rhine Southbound/ Over-the-Rhine Northbound	Walnut Street/ Main Street	14 th Street/ Orchard Street
Findlay Market Southbound/ Findlay Market Northbound	Vine Street	Elder Street/ McMicken Avenue
Vine-McMillan	Vine Street	Calhoun Street
University of Cincinnati	Jefferson Avenue	University Avenue
Hospital District	Burnet Avenue	Albert Sabin Way
Avondale Town Center	Reading Road	Lexington Avenue and Lee Avenue
North Avondale	Reading Road	Dana Avenue

Station	Street	Cross Street
Bond Hill Southbound/ Bond Hill Northbound	Reading Road	California Avenue/ Adina Avenue
Woodward	Reading Road	Midpointe Crossing entrance road
Roselawn	Reading Road	Northwood Drive

III. Infrastructure Improvements

Approximately twenty-seven (27) lane miles of existing roadway will be milled, resurfaced, and striped, in addition to the construction of 0.75 lane miles of widening to facilitate dedicated lanes and the reconstruction or replacement of approximately 1.8 miles of sidewalk. No substantial areas of full-depth pavement reconstruction are anticipated as part of the project. Existing pavement condition evaluations will be conducted in detailed design.

a. Traffic Signals and Turning Movements

There are 88 signalized intersections impacted by the Project:

- 44 signalized intersections from The Banks to Martin Luther King Drive
- 44 signalized intersections on the remaining areas of the Project

There will be active signal priority for BRT vehicles at the following intersections featuring queue jumps:

- 2nd and Main streets
- Main and 6th streets
- Burnet and Northern avenues
- Reading Road and Valley Shopping Center.

Signal modifications, improvements, and additions would occur in areas where mid-block left turns would be restricted by implementation of the Project as a mitigation measure for motorist access.

Transit Signal Priority (TSP) will be utilized at signalized intersections where need is determined. New signal controllers will be included, if needed, to accommodate TSP at the intersections.

B. Project Purpose and Need

In the spring of 2020, Hamilton County voters approved a sales tax levy of 0.8 percent which provided a new funding source for Metro. As a result, Metro developed its Reinventing Metro ¹plan, offering the Greater Cincinnati region bold, new transit innovations that will help grow the regional economy and better connect the community to jobs, education, health care, and entertainment.

The Reinventing Metro plan calls for transit improvements that will positively impact Hamilton County by accomplishing the following:

- 26 routes with more frequent service.
- 18 routes with longer service hours.
- 8 new routes.
- 8 route alignment changes.
- 7 routes with 24-hour service on major corridors.
- Service every 20 minutes or better on major routes, every day.
- Crosstown service every 30 minutes or better during the day, every day.
- More weekend service.
- Access service improvements.
- Additional new transit centers and park & ride locations.
- More new buses with free Wi-Fi, charging ports and other amenities.
- More suburban job connectivity with new demand-response service.
- BRT corridors offering faster travel through limited-stop service.

¹ <https://www.go-metro.com/reinventing-metro/>

In June 2023, Metro approved a Planning Study/Alternatives Analysis which examined four corridors for future BRT development. The study was designed to determine which corridors within Metro's service areas should be developed as the region's first BRT service and other corridors that would receive enhancements in the short term with development as BRT lines in the future. As a result of the planning study, in January 2023, Metro announced that Reading Road would be the first to receive BRT service.

As identified in the Planning Study/Alternatives Analysis, the Project will address travel speed and reliability and increase ridership and mode share.

Improve travel speed and reliability

Existing bus service along Reading Road is often slow and unreliable. Operating on a four-lane urban arterial roadway, the average bus speed is below 15.0 mph. Slow speeds and unreliability are attributed to heavy auto and truck traffic and turning movements along the Project, double parking and stopped delivery vehicles, frequent uncoordinated traffic signals, short bus stop spacing, lengthy dwell times as passengers climb steps and pay fares on-board, and the lack of priority treatments for buses. Trips on the bus can also be crowded with standees, further slowing the boarding and alighting process at stops and affecting on-time performance.

Increase Ridership and Mode Share

Improved speeds and reliability will enhance the experience for existing riders and help Metro attract new riders to transit, leading to a higher transit mode share. Passenger amenities provided at stations (by replacing minimal facilities with shelters, seating, and protected waiting areas) will also enhance the experience and attract new riders.

C. Project Location

The Project runs along portions of Cincinnati's central business district, Over-the-Rhine, Mt. Auburn, Clifton Heights-University Heights-Fairview (CUF), Corryville, the Heights, Avondale, North Avondale, Paddock Hills, Bond Hill, and Roselawn neighborhoods by way of Main Street, Vine Street, Jefferson Avenue, Martin Luther King Drive, Burnet Avenue, Forest Avenue, and Reading Road. The Project is wholly contained within Cincinnati city limits in Hamilton County (Figure 1).

D. Metropolitan Planning and Air Quality Conformity

The Project is currently included as part of the Fiscal Year 2026-2029 Transportation Improvement Program (TIP) amendment adopted on April 10, 2025 and amended on May 14, 2026. It is referenced in the TIP as 112095². This documentation indicates that emissions projected to occur from the Project would conform with applicable air quality requirements for the region.

E. Land Use and Zoning

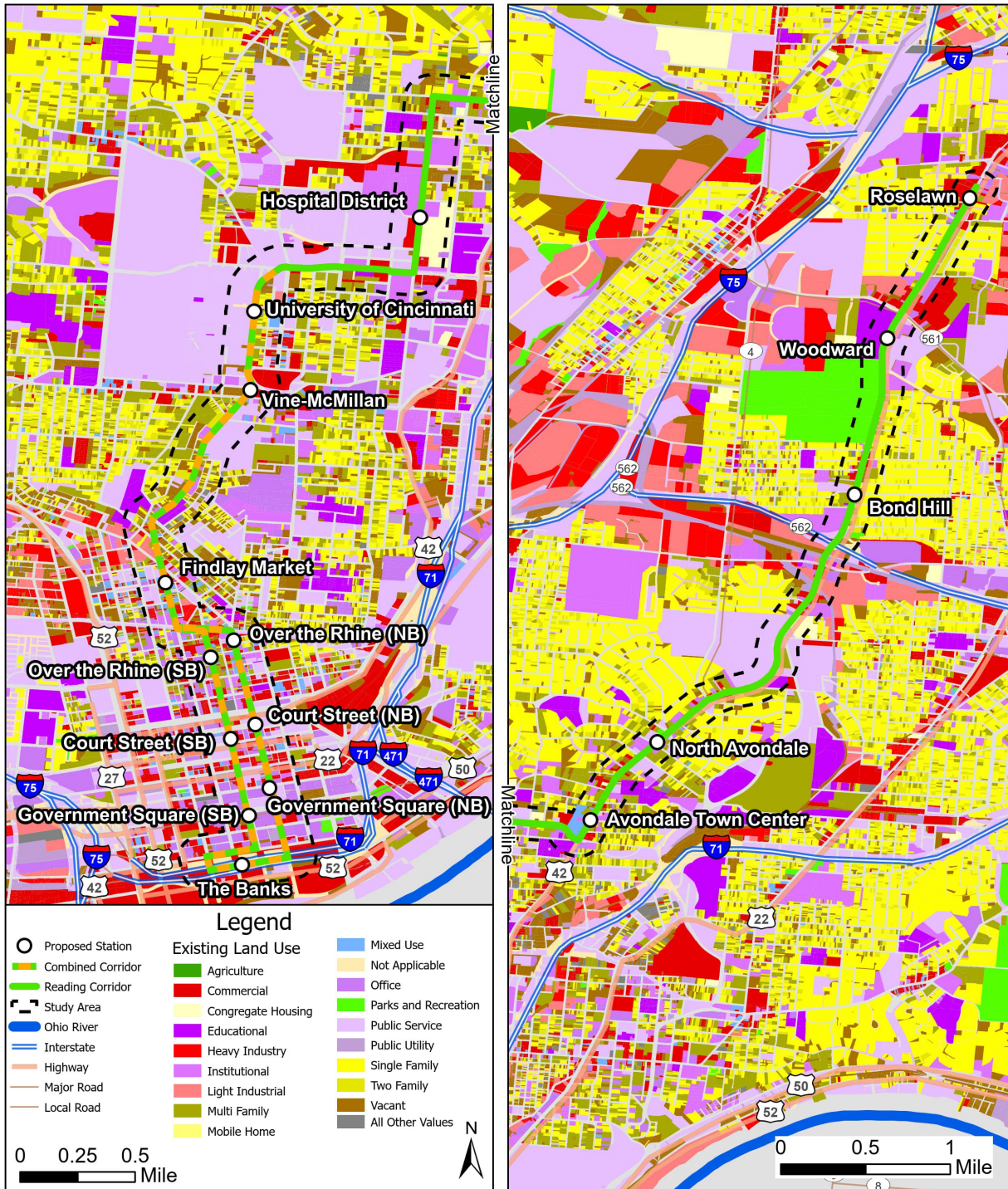
Land use and zoning conditions were reviewed to determine if the Project would have any impacts or benefits on the area as well as to examine its compatibility with the land use vision along the Project corridor. The Project would receive support from a mix of relatively high-density residential, commercial, and institutional land uses over the majority of the Project. Along the designated route, commercial uses are distributed in clusters in the central business district, Over-the-Rhine, Uptown, Avondale, and Roselawn, serving as the employment hubs and/or retail centers. Institutional uses are concentrated in Uptown, while open space and industrial uses are also scattered along the route. Figure 3 shows existing land uses along the Project.

I. Existing Land Uses

At the southernmost portion of the Project corridor, downtown and the Uptown area in Cincinnati are the region's two largest employment and activity centers, with tens of thousands of jobs and the focus point for significant regional travel for jobs, medical services, education, retail, sports, recreation, and entertainment.

² Fiscal Year 2026-2029 Transportation Improvement Program. <https://www.oki.org/transportation/transportation-improvement-program-tip/>

Figure 3. Existing Land Use



Source: CAGIS, 2025.

The Project area directly serves several major medical centers, including University Medical Center and Cincinnati Children's Hospital Medical Center, along with related facilities and institutions. In addition, development of an Innovation District in this area is currently underway.

In between downtown and Uptown, Over-the-Rhine is a densely populated residential, commercial and dining/entertainment area, anchored by Findlay Market, a regional food and entertainment destination. North of the Uptown area, the Project area is primarily residential through the Avondale, North Avondale, Paddock Hills, Bond Hill, and Roselawn neighborhoods. Interspersed along the way are a series of neighborhood business districts. Two of the largest are the Avondale Town Center, which was recently redeveloped as a mixed-use center, and the Roselawn business district. In between, in the vicinity of Reading Road and Summit Avenue is a commercial zone that includes the Woodward Career Technical High School and Midpointe Crossing, a large mixed-use development planned on a currently vacant site.

II. Future Land Uses and Zoning

As a result of recommendations in Plan Cincinnati³ (2012), form-based code policies were adopted in 2024 through Connected Communities. Connected Communities outlines how the City of Cincinnati should grow to encourage future public transit and drive innovation and future ready projects while improving and maintaining existing infrastructure. Implementation of form-based codes encouraging mixed land uses, higher density development (such as transit-oriented development), and pedestrian-oriented design that is conducive to facilitating transit ridership. Higher density, mixed-use development and more affordable housing are encouraged along areas of Reading Road.

Cincinnati City Council passed the Connected Communities Ordinance in June 2024 to enact several policy changes related to land use to help Cincinnati grow into a more accessible, people-focused, diverse, healthy, and connected community for all. Specific to the Project, this ordinance establishes new land use policies and zoning code process improvements designed to increase density and housing along the Project and other transportation corridors. New zoning designations identified in the ordinance include Neighborhood Business Districts, Middle Housing, and Transportation Corridor.

For the Transportation Corridor, the ordinance permits two-family, three-family, and four-family uses, eliminates parking requirements, requires accessory surface parking facilities to be located in the rear, eliminates minimum lot-area-per-dwelling-unit regulations except in single family zoning districts, and permits the height of new structures to exceed the maximum height of the underlying zoning districts by an additional 12 feet, except in single-family zoning districts. The ordinance designates the entire length of the Project area as a Transportation Corridor apart from downtown Cincinnati. The ordinance also permits transit stops in front and side yards.

Neighborhood Business Districts permits two-family, three-family, and four-family uses, relaxes parking requirements, requires accessory surface parking facilities to be in the rear, and eliminates minimum lot-area-per-dwelling-unit regulations except in single-family districts. The following Neighborhood Business Districts are located along the Project, from south to north:

- Over-the Rhine Main Street - served by the Over-the-Rhine and Findlay Market stations.
- Clifton Heights - served by the Vine-McMillan station.
- Corryville - served by the University of Cincinnati station.
- Avondale - served by the Hospital District and Avondale Town Center stations.
- North Avondale - served by the North Avondale station.
- Bond Hill - served by the Bond Hill and Woodward stations.
- Roselawn - served by the Roselawn station.

Middle Housing permits two-family, three-family, and four-family uses, relaxes parking requirements, and requires accessory surface parking facilities in the rear.

3 <https://www.cincinnati-oh.gov/sites/planning/assets/2012%20-%20Plan%20Cincinnati.pdf>

The Project is consistent with future land use and zoning policy and is not anticipated to have any adverse environmental impacts.

F. Traffic Impacts

As the first BRT route implemented by Metro, the Project would improve reliability and travel time, relative to existing transit service, by introducing dedicated and BAT lanes as well as opportunities to allow the BRT vehicles within mixed traffic. BAT lanes are semi-dedicated lanes for BRT vehicles that also allow limited use by general purpose traffic turning at driveways or signalized intersections. Dedicated bus lanes allow BRT vehicles to operate along an exclusive lane to improve speed, reliability and service quality. Mixed traffic areas are locations where the BRT vehicles operate in the same lanes as general-purpose traffic. Several different lane configurations throughout the Project area were evaluated, and the identified configurations identified in Table 2 minimize potential impacts to the existing roadway network, while maximizing BRT efficiency with dedicated lanes or BAT lanes.

Additionally, the Project will include curb modifications at several intersection corners but have minimal impacts to existing pavement width. TSP is planned along the route to improve transit performance at traffic signals. The TSP would monitor on-coming BRT vehicles and provide extra green time or a dedicated signal phase, if required, to allow for travel through the intersection.

As stated previously, the Project is proposed to share an alignment with the Metro Rapid Hamilton Avenue BRT Project between The Banks and the University of Cincinnati, where the alignments are proposed to split at Martin Luther King Drive. The traffic analysis summarized below addresses traffic conditions for both the Project and the Hamilton Avenue BRT Project between the Banks and the University of Cincinnati (Martin Luther King Drive). The Traffic Memorandum is provided in Appendix B.

Table 2. Project Lane Configuration by Location

Approximate Locations	BRT Configuration	Approximate Distance (mile)*
2nd Street – Race to Vine streets (westbound)	Mixed Traffic	0.07
2nd Street – Vine to Main streets (westbound)	Curbside BAT	0.19
Walnut – 5th Street to 3rd streets (southbound)	Mixed Traffic	0.13
Main Street – 2nd to Liberty streets (northbound) Walnut Street – 5 th to Liberty streets (southbound)	Curbside BAT	1.79
3rd Street – Walnut to Race streets (eastbound)	Mixed Traffic	0.17
Race Street – 3rd to 2nd streets (southbound)	Mixed Traffic	0.05
Liberty Street – Main to Vine streets (eastbound and westbound)	Mixed Traffic	0.31
Vine Street – Liberty to McMillan streets (northbound and southbound)	Mixed Traffic	3.08
Vine Street – McMillan to Calhoun streets (northbound)/ Calhoun to McMillan streets (southbound)	Curbside BAT Mixed Traffic	0.04/ 0.05
Jefferson Avenue - Calhoun Street to Martin Luther King Drive (northbound and southbound)	Curbside BAT	0.9
Martin Luther King Jr Drive – Jefferson to Burnet avenues (eastbound and westbound)	Mixed Traffic	1.19
Burnet Avenue – Martin Luther King Jr Drive to Northern Avenue (northbound and southbound)	Curbside BAT	1.18
Burnet Avenue – Northern Avenue to Forest Avenue (northbound and southbound)	Mixed Traffic/ Curbside BAT	0.18/ 0.17
Forest Avenue – Burnet Avenue to Reading Road (eastbound and westbound)	Mixed Traffic	1.05
Reading Road – Forest Avenue to Victory Parkway (eastbound and westbound)	Curbside BAT	3.13

Approximate Locations	BRT Configuration	Approximate Distance (mile)*
Reading Road – Victory Parkway to Paddock Hills Recreation Center (northbound/southbound)	Mixed Traffic/ Curbside BAT	0.12/ 0.11
Reading Road – Paddock Hills Recreation Center to Berkley Avenue (northbound and southbound)	Mixed Traffic	1.43
Reading Road – Berkley Avenue to Stonybrook (northbound and southbound)	Curbside BAT	3.85
Reading Road – Stonybrook to Terminus (northbound)/ Stonybrook to Terminus (southbound)	Mixed Traffic/ Curbside BAT	0.08/ 0.11

*Distance includes lane miles (i.e. includes each direction)

I. Vehicular Traffic

Traffic operations for the Project were evaluated using a traffic rating system called Level of Service (LOS). LOS ratings are measured in terms of average delay per vehicle, where delay is a measure of driver discomfort, frustration, fuel consumption, and lost travel time. LOS A is a free-flowing operating condition, and LOS F has the longest delays. LOS D or better is considered acceptable in most urban settings, though LOS E is sometimes considered acceptable at high-volume locations. Based on coordination with the City of Cincinnati Traffic Engineering Transportation & Engineering Department (DOTE), the department responsible for the construction, maintenance and preservation of the City's transportation network, LOS was determined to be acceptable if LOS was the same or better than the existing LOS, or if it was LOS D or better (Appendix B).

A traffic analysis was conducted for the AM and PM peak hours using Synchro modelling software to assess impacts to general purpose traffic associated with the Project. Synchro is a traffic engineering program used to simulate traffic operations under the Project and optimize conditions including signal timing, if appropriate. The construction of the Project is anticipated to start in 2026 and be completed in 2028.

Based on the traffic analysis, only six of the intersections impacted by the Project result in overall intersection LOS E or F during peak hours:

- Reading Road and Section Road currently operates at LOS E in the AM peak period and LOS F in the PM peak period; with the Project it is expected to operate at LOS B during the AM and LOS E during the PM peak hours.
- Reading Road and Tennessee Avenue currently operates at LOS D in the AM peak hours and LOS F in the PM peak hours; under the Project it is expected to operate at LOS F during both peak hours.
- Reading Road and Clinton Springs currently operates at a LOS F during both the AM and PM peak hours; under the Project, it is anticipated to operate at a LOS F during both the AM and PM peak hours.
- Jefferson Avenue and University Avenue currently operates at LOS B in the AM and PM peak hours; under the Project it is expected to operate at LOS E in the PM peak hour.
- Jefferson Avenue/Vine Street and William Howard Taft Road currently operates at LOS B in the AM and PM peak hours; under the Project, it is expected to operate at LOS E in the PM peak hour.
- Vine Street and McMillan Street currently operates at LOS B in the AM and PM peak hours; under the Project, it is expected to operate at LOS E in the PM peak hour.

With the Project, six of the 88 signalized intersections do not meet the acceptable standard of LOS D or better as indicated above. Metro and the Cincinnati DOTE will continue to coordinate and evaluate options to mitigate impacts on those six intersections during final design (Appendix B). Traffic analysis and signal timing optimization will be implemented with the Project. With these, the traffic analysis results determined that 82 of the 88 intersections would operate at the same or better than existing LOS or with a LOS D or better. As a result, the Project would not be adversely detrimental to the overall corridor.

II. Parking

There are currently approximately 1,041 on-street parking spaces along the Project corridor and approximately 182 spaces would be removed as a result of the Project. Additional coordination between Metro and the DOTE during detailed design may reduce the number of spaces impacted by the Project. For areas where parking stalls are not marked, the number of available spaces was calculated using the total length of the block and subtracting non-parking areas, like driveways, and divided by the length of a typical vehicle (20 feet). Across most of the area, parking would remain readily available after the Project (Table 3 and Appendix A).

In the downtown, parking lost as a result of the Project could be absorbed on adjacent side streets. It should be noted that approximately 23 spaces in downtown are removed to provide two continuous through lanes as requested by the DOTE.

For the Project, one area of parking concern was identified: Reading Road from Lexington Place to Avondale Avenue. Because of these concerns, additional analysis was completed. An inventory of existing on-street parking along the route was taken to determine the impact of displaced parking spaces due to the Project (Appendix C). The section of Reading Road evaluated currently prohibits parking between 3:00 PM to 6:00 PM weekdays, identified for parking observations included the intersections of Lee Place/Lexington Avenue to Greenwood Avenue/Burton Avenue and from Lenox Place to Avondale Avenue. Parking observations were performed during late-night hour (November 12, 2024) and midday peak hour (November 13, 2024). During the midday peak hour (11:00 AM-12:00 PM), three runs were performed. Between the Lee Place/Lexington Avenue to Greenwood Avenue/Burton Avenue segment of Reading Road, approximately 77 parking spaces are available for which 3 were seen to be occupied during the midday peak and 13 occupied during late night hours. This brings the parking utilization to a maximum of approximately 17%. From Lenox Place to Avondale Avenue, approximately 12 parking spaces are available. During the midday peak, one vehicle was parked and during the late-night period, three vehicles were observed increasing the utilization to a maximum of approximately 25%. The observed parking data indicates that there would be enough available parking spaces along Reading Road or side streets to accommodate desired parking demand.

Table 3. Parking Impacts along the Project

Roadway	Side	From	To	Type (Paid or Free)	Approximate Spaces Available (#)	Spaces Removed (#)
E 3rd St	South	Vine Street	Race Street	Paid (Metered)	19	-
E 3rd St	South	Walnut Street	Vine Street	Paid (Metered)	15	-
E 3rd St	South	Main Street	Walnut Street	Paid (Pay to Park)	8	-
E 3rd St	North	Main Street	Sycamore	Free	8	-
Main St	West	3 rd Street	4 th Street	Paid (Metered)	6	-
Main St	Both	6 th Street	7 th Street	Paid (Metered), Free	14	9*
Main St	Both	7 th Street	8 th Street	Free or Paid to Park	11	2*
Main St	Both	8 th Street	9 th Street	Combination (Metered + Pay to Park)	10	3*
Main St	Both	9 th Street	Central Parkway	Paid (Metered)	13	7
Main St	East	Central Parkway	12 th Street	Free	7	-
Main St	Both	12 th Street	13 th Street	Combination Free and Paid (Metered)	14	-
Main St	Both	13 th Street	14 th Street	Paid (Metered and Pay to Park))	29	-
Main St	Both	14 th Street	Liberty Street	Paid (Metered)	10	4

Roadway	Side	From	To	Type (Paid or Free)	Approximate Spaces Available (#)	Spaces Removed (#)
Walnut St	East	3 rd Street	4 th Street	Paid (Metered)	8	8
Walnut St	East	4 th Street	5 th Street	Paid (Metered)	15	12
Walnut St	Both	5 th Street	6 th Street	Free	5	-
Walnut St	Both	6 th Street	7 th Street	Free and Paid (Metered)	25	-
Walnut St	East	8 th Street	9 th Street	Free	4	4*
Walnut St	Both	9 th Street	Central Parkway	Free/Paid (Metered)	15	5*
Walnut St	Both	Central Pkwy	12 th Street	Free or Paid (Metered)	11	-
Walnut St	Both	12 th Street	13 th Street	Paid (Metered)	30	-
Walnut St	Both	13 th Street	14 th Street	Combination Permit Parking Only; Paid (Pay to Park)	39	-
Walnut St	Both	14 th Street	Liberty Street	Paid (Pay to Park)	35	5
E 5th St	North	Vine Street	Walnut Street	Free	8	-
E Liberty St	Both	Vine Street	Main Street	Paid (Metered)/Pay to Park	28	-
Vine St	West	Liberty Street	Green Street (west)/Glanker Street (east)	Paid (Metered)	25	
Vine St	Both	Green Street (west)/ Glanker Street (east)	Elder Street	Paid (Metered)	29	5
Vine St	Both	Elder Street	McMicken Avenue	Free	17	2
Vine St	East	McMicken Avenue	Clifton Avenue	Free	19	-
Vine St	East	Clifton Avenue	Mulberry Street	Free	4	-
Vine St	East	Mulberry Street	St. Joe Street	Free	24	-
Vine St	East	St. Joe Street	Thill Street	Free	31	-
Vine St	West	McMicken Avenue	Polk Street	Free	100	-
Vine St	Both	Thill Street	Hollister Street	Free	33	-
Vine St	West	Polk Street	Hollister Street	Free	18	-
Vine St	Both	Hollister Street	McMillan Street	Free	32	-
Jefferson Ave	Both	Corry Street	Charlton Street	Combination Free and Paid to Park	27	-
Jefferson Ave	West	Charlton Street	Daniels Street	Paid	15	-
Jefferson Ave	East	Daniels Street	University Avenue	Free	3	1
Jefferson Ave	East	University Avenue	Martin Luther King Drive	Free	7	-
Martin Luther King Dr	South	Euclid Avenue	Eden Avenue	Free	20	-
Martin Luther King Dr	South	Ahrens Street	Euclid Avenue	Free	7	-
Burnet Ave	East	Martin Luther King Drive	Goodman Avenue	Free	2	2

Roadway	Side	From	To	Type (Paid or Free)	Approximate Spaces Available (#)	Spaces Removed (#)
Burnet Ave	West	Goodman Avenue	Albert Sabin Way	Free	9	-
Burnet Ave	East	Kasota Street	Catherine Street	Free	13	13
Burnet Ave	East	Erkenbrecher Avenue	Northern Avenue	Free	6	6
Burnet Ave	West	Northern Avenue	Rockdale Avenue	Free	5	5
Burnet Ave	Both	Rockdale Avenue	Forest Avenue	Free	19	19
Forest Ave	Both	Burnet Avenue	Harvey Avenue	Free	28	-
Forest Ave	Both	Harvey Avenue	Washington Avenue	Free	51	-
Forest Ave	Both	Washington Avenue	Reading Road	Free	40	-
Reading Rd	East	Lexington Avenue	Mann Place	Free	10	10
Reading Rd	East	Mann Place	Glenwood Avenue	Free	10	10
Reading Rd	West	Glenwood Avenue	Gholson Avenue	Free	7	7
Reading Rd	East	Gholson Avenue	Fred Shuttlesworth Circle	Free	23	23
Reading Rd	East	Fred Shuttlesworth Circle	Glenwood Avenue/Burton Avenue	Free	8	8
Reading Rd	East	Lenox Place	Avondale Avenue	Free	12	12
				Totals	1,041	182

*= Parking taken to provide two continuous through lanes as requested by the DOTE. Additional coordination between Metro and the DOTE during detailed design may reduce the parking impacts in these areas.

G. CO Hot Spots

Carbon Monoxide (CO) regional conformity requirements in Ohio ended on Friday, March 7, 2014. According to 40 Code of Federal Regulations (CFR) 93.102(b)(3), a transportation conformity determination applies to maintenance areas through the last year of a maintenance area's approved Clean Air Act section 175A(b) maintenance plan, unless the applicable implementation plan specifies that the provisions of this subpart shall apply for more than 20 years. Therefore, regional transportation conformity requirements no longer apply in Ohio. Additionally, the Project is not anticipated to create a CO hotspot or exacerbate CO air quality concerns because it would increase transit use while improving traffic flow.

Recent trends in CO concentrations across the state have dramatically improved as demonstrated by the attainment status of Ohio. As such, project level CO hot-spot analyses using MOVES3 and CAL3QHC emission and dispersion models are no longer required in Ohio.

H. PM2.5 and PM10 Hot Spots

The US Environmental Protection Agency, (https://www3.epa.gov/airquality/urbanair/sipstatus/reports/oh_areabypoll.html, accessed 03/15/2025) indicates Hamilton County is currently classified as in attainment for particulate matter (PM). As such, the area already conforms to the applicable PM standards and does not require a PM conformity analysis. The Project is not likely to be considered a project of concern for PM. Additionally, as a transit enhancement project, which falls under CFR 93.126 Table 2, it is exempt from a hot-spot analysis.

I. Historic Resources

Since the FTA is providing funding for the Project, it is subject to compliance with the National Historic Preservation Act (NHPA) of 1966, as amended (54 U.S.C. § 300101 et seq.) and its implementing regulations (36 CFR 800). Specifically, Section 106 of the NHPA requires FTA as the lead federal agency to take into account the effects of its undertakings on historic properties.

Per Section 106 requirements, the lead federal agency, in consultation with the State Historic Preservation Office (SHPO), determines the area of potential effect (APE). The APE is defined in Section 106 of the NHPA as “the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties if any such properties exist.” The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.

Additional technical documentation regarding historic resources and effects determinations can be found in Appendix D.

I. Area of Potential Effects

For the Project, the APE consists of construction limits and a buffer of the adjacent modern parcel lines around those and permanent right-of-way acquisition. As much of the Project would not result in new above ground elements, most of the proposed work is preliminarily expected to result in no adverse visual effects to any Historic Properties that may be adjacent. However, the Project includes the addition of BRT stations. Each of those locations were assessed for potential adverse effects to surrounding Historic Properties. The APE includes a 150-foot buffer around each of the new above ground elements at each location. As a primarily visual effects buffer, this APE takes into account those resources that are adjacent to station locations, within the immediate block, or somewhat further in areas where visibility extends further than the street level of a given block. The APE was submitted for review and comment to the Ohio Historic Preservation Office (OHPO) and consulting parties in March 2025 and no comments were received.

II. Historic Architectural Resources

Data was requested from the OHPO Online Mapping System to determine what, if any, historic resources were present within the APE and supplemented with field reviews. Ohio History Inventory (OHI) forms were requested from OHPO which aided in determining any recommendations. The Ohio Department of Transportation’s Information Mapping System (TIMS) Historic Bridge database was utilized to determine if there were any historical-era bridges within the APE. Bridge Inventory and Appraisal forms were acquired for each identified bridge as it noted a build date and its Ohio Department of Transportation eligibility evaluation. A review of each resource was conducted online and in the field to determine extant resources and confirm addresses/locations. Each resource was photographed and evaluated.

Table 4 identifies local landmarks identified in the Cincinnati Area Geographic Information System (CAGIS) Open Data Hub within the APE. Most of these resources are adjacent to the Project but are not within a particular station location’s APE. The only exception is the Traction Building [0302-2016] which lies at the southeast corner of the Government Square southbound station. The undertaking will not have an adverse effect on any of these resources since right-of-way acquisition is not anticipated.

Table 4. Local Landmarks Within the APE

Reference #	Name	Location	Associated Resource #
Not Applicable (n/a)	The Reading	3700 Reading Road	National Register of Historic Places (NRHP): MP100006851
0452-1985	Citadel of the Salvation Army	114 8 th Street	OHI# HAM0205244
0452-1985	Underwriters Salvage Corps	110-112 8 th Street	NRHP: 82003589
0452-1985	St. Louis Church	29 8 th Street	n/a
0257-2016	Brunswick-Balke-Collender Building	130-132 6 th Street	NRHP: SG100000568/ OHI# HAM0835344
0256-2016	Reakirt Building	126-128 6 th Street	NRHP: SG100000569/ OHI# HAM0835244

Reference #	Name	Location	Associated Resource #
0302-2016	Traction Building	432 Walnut Street	NRHP: SG100001270/ OHI# HAM0178844
n/a	Mercantile Building	414 Walnut Street	NRHP: SG100006914/ OHI# HAM0171644
0134-2016	First National Bank Building	101 4 th Street	NRHP: SG100000570/ OHI# HAM0165844
0029-201	Union Central Life Annex	301 Vine Street	OHI# HAM0554144

The CAGIS Open Data Hub also indicated portions of three Local Historic Districts occurring within the APE. All three of these have individual BRT stations within or adjacent to their areas (Table 5).

Table 5. Local Historic Districts Within the Study Area

Reference #	District Name	Location
0380-2019	Bella Vista Historic District	Bounded by parcels immediately adjacent to Bella Vista Street
0539-1984	Main Street Historic District	Roughly bounded by parcels immediately adjacent to Main Street between East Court Street and 6 th Street
0538-1984	Court Street Historic District	Roughly bounded by parcels immediately adjacent to Plum Street, West Court Street, East Court Street, and Sycamore Street

III. National Register of Historic Places

There are 30 individual NRHP listings within the APE (Table 6). Seven of these resources lie within the immediate vicinity of a station (Table 6). The remaining individual listings are within the APE but not a station location. The Project would not have an adverse effect on any of the NRHP-listed historic properties. Right-of-way acquisition is also not anticipated.

Table 6. Individual NRHP Listings in APE and Vicinity of Stations

Resource Name	Location	NRHP Reference #	Criteria	Station Location
St Aloysius Orphanage	4721 Reading Road	12000835	A	N/A
The Alameda Flats	3580-3586 Reading Road	14000293	A & C	N/A
Poinciana Flats	3522 Reading Road	14000294	A & C	Avondale Town Center
The Crescent	3719 Reading Road	14000336	A & C	N/A
A. E. Burckhardt House	400 Forest Avenue	80003038	C	N/A
Walter Field House	3725 Reading Road	80003053	C	N/A
Grace Church	3626 Reading Road	82003581	C	N/A
The South Crescent Arms	3700 Reading Road	MP100006851	A & C	N/A
Isaac M Wise Temple-Center	3771 Reading Road	SG100003527	A & C	North Avondale
Edward Hart House	818 Glenwood Avenue	SG100008694	B	N/A
Union Trust Building	36 4 th Street	08000802	C	N/A
Hotel Metropole	609 Walnut Street	09000443	A	N/A
United States Post Office and Court House	100 5 th Street	15000184	C	Government Square (Southbound)
Old St. Mary's Church, School and Rectory	123 3 th Street	76001439	A & C	N/A
Tyler Davidson Fountain	5 th Street	79001854	C	N/A
Gwynne Building	602 Main Street	79001856	C	Government Square (Northbound)

Resource Name	Location	NRHP Reference #	Criteria	Station Location
Alms and Doepke Dry Goods Company	222 E Central Parkway	80003035	C	N/A
Theodore Krumberg Building	1201 Main Street	82001467	C	N/A
Nathaniel Ropes Building	917 Main Street	82003585	C	Court Street (Northbound)
Underwriters Salvage Corps	110-112 8 th Street	82003589	A	N/A
Young Women's Christian Association of Cincinnati	898 Walnut Street	82003591	A & C	Court Street (Southbound)
Main and Third Street Cluster	300-302, 304-306 Main Street and 208-210 3 rd Street	83001984	A & C	N/A
Main-Third Street Grouping	208-210 3 rd Street and 300-318 Main Street	83004654	C	N/A
Courtland Flats	117-121 Court Street	84001046	C	N/A
Formica Corporation-Crystal Arcade-Contemporary Arts Center Building	120 4 th Street	RS100007941	C	N/A
Brunswick-Balke-Collender Building	130-132 6 th Street	SG100000568	A & C	N/A
Reakirt Building	126-128 6 th Street	SG100000569	C	N/A
First National Bank Building	105 4 th Street	SG100000570	C	N/A
Traction Company Building	432 Walnut Street	SG100001270	C	Government Square (Southbound)
Mercantile Library Building	414 Walnut Street	SG100006914	A & C	N/A

There are three NRHP Historic Districts within the APE (Table 7). Only the Over-the-Rhine Historic District (83001985) has station locations within its boundaries: both northbound and southbound Findlay Market stations and both northbound and southbound Over-the-Rhine station.

Table 7. NRHP Districts Within the APE

Reference #	District Name	Location	Criteria	Date
15000326	West Fourth Street Historic District (+Boundary Increase)	309 Vine Street	A & C	2015
88000078	East Fourth Street Historic District	123, 127, and 135--137 4 th Street	C	1988
83001985	Over-the-Rhine Historic District	Roughly bounded by Dorsey, Sycamore, Liberty, Reading, Central Parkway, McMicken Avenue and Vine Street	A & C	1983

IV. Previously Evaluated – NRHP-Eligible Resources

A review of the SHPO Determination of Eligibility (DOE) files indicated a 36 DOE markers within the APE. Thirteen of these resources lie within the immediate vicinity of a station location. The Project will not have an adverse effect on any of these NRHP-Eligible Historic Properties (DOE resources), no right-of-way acquisition is anticipated.

Table 8. Previously Evaluated NR-Eligible Resources

Resource Name/ Function	Location	Resource #	NRHP Eligibility Criteria	Station
Professional Office	1029 Court Street	DOE 2459	C	Court Street (Northbound)
Commercial	41 Court Street	DOE 1423	C	Court Street (Southbound)
Commercial	39 Court Street	DOE 1422	C	Court Street (Southbound)
Commercial	37 Court Street	DOE 1421	C	Court Street (Southbound)
Commercial	33-35 Court Street	DOE 1419	C	Court Street (Southbound)
Commercial	31 Court Street	DOE 1417	C	Court Street (Southbound)
Commercial	1432 Main Street	DOE 3101 & 3102	A, B, D	Over-the-Rhine (Northbound)
Public Library	3566 Reading Road	DOE 3256	A & C	Avondale Town Center
Residential/ Commercial	3800 Reading Road	DOE 1841	C	North Avondale
Park	3821 Reading Road	DOE 1843	C	North Avondale
Residential/ Commercial	3886 Reading Road	DOE 2106	C	N/A
Residential/ Commercial	3870 Reading Road	DOE 1845	C	N/A
Residential/ Commercial	3850 Reading Road	DOE 1842	C	N/A

The SHPO data also included Federal Tax Credit (FTC) files, which indicate that a resource has been determined Eligible for the NRHP. There are 130 FTC markers within the APE (Appendix D). Twenty-one of these resources lie within the immediate vicinity of a station location. The Project will not have an adverse effect on any of these NRHP-Eligible Historic Properties (FTC resources) and no right-of-way acquisition is anticipated.

V. Unevaluated - Ohio Historic Inventory Resources

A review of the OHI resources did not indicate any properties within the Project. However, there are 232 OHIs within the APE Investigation Area. These resources are indicative of Cincinnati's urban growth from the early-nineteenth century to the present. Some of these resources have been demolished. There are 36 of these resources within the immediate vicinity of a station. While the project will have No Effect on any existing OHIs, right-of-way acquisition is not anticipated.

VI. Historic Resources - Effects Assessment

Based on the evaluation completed for the Project, on April 17, 2026, FTA determined the Project would have no adverse effects on NRHP resources or those resources eligible for listing in the NRHP. OHPO concurred with the findings of No Adverse Effect on May 15, 2026. Additional documentation regarding historic resources can be found in Appendix D.

VII. Archaeological Resources

The Ohio Historic Preservation Office online GIS indicated one previously recorded archaeological site within a portion of the Project construction limits. HA0002 was an open, Prehistoric, Middle Woodland site. It is located in the downtown portion of the literature review Project area and assumed to have been entirely

removed by the development of Cincinnati over many generations. On April 17, 2026, FTA determined the Project would have No Adverse Effect. SHPO concurred with the findings on May 15, 2026.

J. Visual Quality

The Project area generally consists of a mix of commercial and residential land uses within an existing local and regional roadway network, typical of the urban and suburban communities that encompass the Project. As such, the Project would not result in substantive changes to the landscape or viewshed proximate to the rights-of-way. The introduction of stations could result in potential viewshed considerations and was the focus of the impact analysis. New stations have been sited in proximity to major activity and employment centers, residential areas, and at intervals consistent with BRT operations.

The design elements for stations includes:

- Shelters: Weather protection, seating, lighting, and information displays.
- Platforms: Safe and accessible boarding areas, with clear markings and paving.
- Signage and Wayfinding: Clear and consistent information displays, route maps, and destination information.
- Lighting: Adequate and energy-efficient lighting for safety and security.
- Landscaping: Low impact plantings to improve aesthetics and air quality.

Station typologies are groupings of stations that share common characteristics. These groupings allow for the development of policies that address the needs of each station area. During the development of station locations and typologies for the Project, numerous characteristics of the Project area were reviewed and identified, including:

- Community and stakeholder engagement.
- Environmental reviews.
- Station design requirements.
- Safety analysis.
- Systems and signalization.
- Parking analysis.
- Zoning districts.
- Physical constraints and utilities.

As a result, the Project designers developed typologies that accommodate the setting around each station area and minimize the feeling of intrusion into the area to the greatest extent feasible. The context-sensitive design for station areas is important for creating functional, safe, and welcoming spaces. For the Project, the context-sensitive design means tailoring the design to the specific needs and characteristics of the surrounding environment, considering factors such as:

- Location and Setting
 - Downtown Core – emphasizing high capacity, efficient passenger flow, and integration with other transit modes (streetcar and local bus service). This area focuses on minimizing pedestrian congestion and providing clear wayfinding, consideration of vertical integration with the urban skyline.
 - Residential Neighborhoods - Minimizing noise and visual intrusion while providing safe and well-lit pedestrian access. This considers the needs of children, seniors, and people with disabilities while integrating the station into the current aesthetic of the neighborhood.
 - Suburban Areas – emphasizing park-and-ride facilities, bicycle parking, and connections to local bus routes. This area focuses on consideration of weather protection, comfortable waiting areas, and addresses concerns related to isolated parking lots.
- User Needs and Demographics - Includes review of accessibility, safety, comfort and information and wayfinding.
- Existing Transportation Network – this includes accommodation of intermodal connections, traffic flow, and potential future growth opportunities.

By considering these factors, the Project can create station areas that are not only functional and efficient but also contribute to the overall visual quality of the surrounding environment. As a result, views to and

from the Project are not anticipated to materially change, as these built elements would be visually consistent in the context of existing Project area conditions. A visual rendering representative of a Project neighborhood station is provided in Figure 4.

Figure 4. Rendering of the Avondale Town Center Station.



K. Noise

Existing noise sources in the Project area include traffic on local roadways and highways, railroad traffic, aircraft overflights, and local community activities. The existing ambient sound levels vary by location, depending on the proximity to local roadways, and are generally typical of urban and suburban environments near busy arterial roadways. Existing noise levels were estimated at a distance of 15 feet from the Project to the nearest building using Annual Average Daily Traffic (AADT) for the Project (Appendix E). The General Noise Assessment formulas for highway/transit sources given in the FTA Manual were used, including a reference Sound Exposure Level (SEL) of 74 A-weighted decibels (dBA)⁴ for automobiles and BRT vehicle speeds of 20 miles per hour (mph) from The Banks to Martin Luther King Drive and 30 mph from Martin Luther King Drive to Roselawn based on posted speed limits and anticipated maximum operating speeds. These calculations resulted in estimated existing noise levels of 63 to 64 dBA along the Project area. The estimated existing noise levels were then used to compute the corresponding “moderate” impact criteria and associated screening distances, or the distance from the roadway within which noise levels might exceed the given limits, for FTA Land Use Categories 1, 2 and 3.

The following AADTs were used:

- From The Banks to Martin Luther King Drive: 6,839 daytime vehicles, 1,000 nighttime vehicles, and 671 peak hour vehicles.
- From Martin Luther King Drive to Roselawn: 17,762 daytime vehicles, 2,225 nighttime vehicles, and 1,767 peak hour vehicles.

⁴ dBA is a unit of measurement for sound levels that approximates how the human ear perceives sound.

Specific input conditions in the noise screening model included the following:

- Source reference noise level for diesel buses of 82 dBA SEL at 50 feet and 50 mph.
- BRT vehicle maximum operating speeds of 20 mph when operating in downtown and 30 mph when operating from Marter Luther King Drive to Roselawn Per the FTA Manual, conservative estimates for speed such as maximum design or operating speeds anticipated are appropriate at this stage of analysis to estimate worst-case noise levels⁵.
- The weekday operating schedule for the BRT vehicles results in 172 daytime buses and 32 nighttime buses.

The weekday operating schedule for Metro's fixed route 43 will include a reduction by approximately 66% of existing fixed route bus service between The Banks in downtown and Roselawn.

The primary source of noise at stations is idling buses; however, the noise levels generated by idling buses are not expected to greatly contribute to Project noise levels as bus idling will be at a minimum for BRT service and existing buses will be reduced by two-thirds of existing service. FTA Land Use Category 2 noise-sensitive properties along the Project, including downtown, include single-family and multi-family residential properties, other congregate housing, hospitals, and hotels or motels. FTA Land Use Category 1 noise-sensitive spaces exist at the Aronoff Center for the Arts (Aronoff) in downtown. Category 3 noise-sensitive properties in the Project area include parks, schools, places of worship, libraries, theaters, and museums.

Bus operations would not be altered with the No Build Alternative, and would therefore result in no change to existing noise levels.

The screening distances were calculated for the Project using general noise assessment calculations, project specific data inputs, and the moderate and severe impact thresholds identified in FTA's Noise and Vibration Impact Guidance Manual. The screening distances by each FTA Land Use Category and the number of noise receptors are shown in Table 9. The table also includes the estimated existing noise level compared to the calculated Project noise levels to the nearest building.

Properties were identified based on parcel data and an aerial review of the Project (Appendix E). Land Use Category 2 properties were included where the nearest building facade fell within the distance to moderate impact. Multi-family residential properties are included in the Land Use Category 2 counts and may include multiple units not counted in this inventory. Mixed use buildings are also included in the Land Use Category 2 counts where residential use is expected on the upper floors. As shown in Table 9, predicted project noise levels are above the potential moderate noise impact threshold at Category 2 properties from the Banks to Martin Luther King Drive along Vine Street. The moderate impact threshold to residential buildings identified along the Project area was calculated within 2 to 23 feet of existing roadways depending on Project section, where the BRT vehicles will be in operation and existing fixed route service operates (Appendix E).

The general noise assessment identified the potential for an increase in noise levels from the Project that fall just into the moderate noise impact range identified in FTA's Transit Noise and Vibration Impact Assessment Manual and did not estimate any noise impacts within the severe range (Appendix E). The noise contours in these moderate impact range typically reach the front of the buildings. Based on the assessment completed for the Project, there is potential for moderate noise impacts. A detailed noise assessment will be completed during final design to confirm potential impacts and, if needed, mitigation once a refined operating plan is finalized and more detailed engineering and design is completed. Potential mitigation options could include asphalt pavement treatments, vehicle modifications or building insulation for receptors with moderate impacts.

⁵ FTA Transit Noise and Vibration Impact Assessment Manual, FTA Report No. 012, page 39.

Table 9. Noise Screening Distances and Potential Noise Impacts

Project Location	FTA Land Use Category	Estimated Distance to Nearest Building to Project	Estimated Existing Noise Nearest Building	Estimated Project Noise Level Nearest Building	Project Noise Level Threshold for a Moderate Impact	Moderate Impact Criterion Project Distance Screen Distance (ft)	Number of Buildings within a range for impacts
The Banks to Martin Luther King Drive	1	15	63	59	60	<15	0
	2	15	63	62	60	23	24
	3	15	63	59	65	<5	0
Martin Luther King Drive to Roselawn	1	15	64	59	60	<15	0
	2	15	64	62	60	20	3
	3	15	64	59	65	<5	0

Note: No severe noise impacts were identified.

L. Vibration

For projects that involve rubber-tired vehicles, such as a BRT project, vibration impact is unlikely except in unusual situations which can include vibration-sensitive land uses near expansion joints, speed bumps, uneven road surfaces, or buses operating in or very close to a vibration sensitive building such as a research facility or hospital (FTA Manual). If these scenarios do not exist on a BRT project, then the vibration screening procedure does not need to be conducted, and no vibration impacts would be expected for the Project.

Because the Project involves rubber-tired vehicles, a vibration screening assessment would only be conducted under unusual circumstances, as described above. There are possible vibration-sensitive buildings along the Project, including medical facilities at Cincinnati Children's Hospital and performance halls at the Aronoff. However, these properties include large masonry buildings, so adding additional rubber-tired vehicles to an existing roadway that is already in use by other buses and trucks would not significantly increase the vibration levels above those already experienced at these locations.

Operational vibration impacts are not expected due to the Project.

M. Acquisitions & Relocations Required

The Project would not displace any businesses or residences. Access to businesses and residences would be maintained during construction and coordinated by Metro and the construction contractor. The Project would require both partial permanent right-of-way acquisition from properties and temporary construction easements (Appendix F). The partial permanent acquisition of these properties is not anticipated to limit the existing or future uses of the parcels. A total of approximately 0.93 acre of new permanent right-of-way would be required for the Project (Table 10). Following construction, property acquired for the Project would become part of the City of Cincinnati public transportation right-of-way. Through detailed design, Metro will continue to minimize the amount of right-of-way needed for the Project. Approximately 0.63 acres of temporary construction easements would be needed for construction. Following construction, the temporary easements would revert back to their current uses.

Table 10. Estimated Right-of-way and Acquisition Summary

Use	Temporary Right-of-Way Requirements (Acres)	Permanent Right-of-Way Requirements (Acres)
Residential	0.01	0.01
Commercial	0.61	0.88
Industrial	0.02	0.03
Total	0.63	0.93

The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (49 CFR 24) (URA) will apply to the Project and Metro will follow the URA. No offers or appraisals will occur until after NEPA documentation has been approved by the FTA.

N. Hazardous Materials

Analysis of the Project identified potential sources of hazardous material (HazMat) impacts within existing right-of-way and on adjacent property that may be acquired. These sites of concern, which have previously or currently contained hazardous materials and/or waste, still have the potential to contain HazMat contamination.

The evaluation was completed to identify potential sources of contamination within the Project area using Ohio's Regulatory Property Search (ORPS) tool and Project plans. Additionally, on February 17, 2025, a field reconnaissance was conducted to visually and physically observe the sites of concern and the immediate vicinity for potential evidence and/or practices that could be determined to be a risk. No outlier low or high-risk properties other than the properties identified by ORPS were observed.

From the database review, 240 sites of concern were identified along the Project, twelve are listed as Underground Storage Tanks (USTs) or Leaking USTs (LUST), 14 are classified as Resource Conservation and Recovery Act (RCRA) sites, one is a Spills, and two are Non-NPL sites. Note that a property can be listed under multiple databases. A listing of these sites and mapping are documented in Appendix G. Based on the information available, these sites have a low to high potential for contamination concerns associated with the Project.

Excavation required for pavement reconstruction and/or addition of sidewalks would be typically limited to only include the top three to five feet below the current ground surface. No adverse impacts are anticipated, however, if during construction, contamination is identified, steps will be taken to ensure that proper personal protective equipment (PPE) is used and proper disposal of any contaminated soil or construction debris will occur, in accordance with federal, state, and local regulations.

Table 11 identifies potential sites of concern and summary recommendations for properties along the Project.

O. Social Impacts and Community Disruption (Community Character)

Data were reviewed for socioeconomic conditions and resources within a 500-foot buffer of the Project centerline. The Project will provide enhanced transit services from downtown Cincinnati to Uptown and Roselawn. The Project would run within or adjacent to neighborhood areas in Cincinnati, Hamilton County, including downtown, Over-the-Rhine, Mount Auburn, CUF, the Heights, Corryville, Uptown, Avondale, North Avondale, Paddock Hills, Bond Hill, and Roselawn.

The neighborhoods listed above are within census tracts that are wholly or partially within the Project area (all within Hamilton County, Ohio). The demographic profile within these census tracts shows a total population of 69,556 within the Project area, based on the 2022 5-year American Community Survey (ACS) estimates. The female population is 49.6% and the male population is 50.4% of the total population within the census tracts within the Project. In comparison, the State of Ohio has a female and male population of 50.6% and 49.4%, respectively. Hamilton County has a female and male population of 51.4% and 48.6%, respectively.

Table 11. Sites of Concern along the Project

Project Parcel ID #	ORPS Address (Description)	Impact Area (acres) (Temporary/ Permanent)	Database(s)	Construction Activity	Recommendation
239/240	2 nd and Vine Street (no address)	0/0	Resource Conservation and Recovery Act (RCRA)	Station Construction	No additional analysis. The station is above the Transit Center on Second Street which is on structure; there is a lack of potential soil/groundwater contamination
236-238	38 Fountain Square Plaza	0/0	Non-National Priority List (NPL) Superfund Site, RCRA, Large quantity Generator (LQG)	Roadway resurfacing in area	The Project station was co-located with the Cincinnati Connector south of 5th Street. Pavement resurfacing would have minimal excavation within the existing transportation right-of-way (curb lines). No additional work is anticipated near Project Parcels 236-238. No additional concerns have been identified.
235	550 Main Street (Peck Federal Building)	0.013/0	Underground Storage Tank (UST), Leaking UST (LUST)	Station and sidewalk	File review of ORPS Facility #31010658 identified inactive underground storage tanks were removed from the Project parcel with a No Further Action (NFA) by the Ohio Environmental Protection Agency (OEPA) issued for the address location. While a temporary construction easement (0.013 acre) is needed for the station and American with Disabilities Act (ADA) sidewalk curb ramps, no soil disturbance is anticipated on the parcel. Project work would occur above existing basement vaults which extend under the sidewalk between the building face and Main Street.
234	800 Vine Street (Cincinnati & Hamilton County Public Library)	0/0	UST, LUST, RCRA Small Quantity Generator (SQG), Ohio Spills (SPILLS)	Road Resurfacing	File review of ORPS Facility #31008310 identified underground storage tanks that had been removed from the site and a NFA was issued by OEPA. ORPS also indicated two gasoline tanks, removed in 1994. No additional concerns have been identified.
233	1000 Main Street (Hamilton County Courthouse)	0/0	UST, LUST, RCRA	Road Resurfacing	File review of ORPS Facility #31005741 identified underground storage tanks removed from the site, one gasoline tank removed in 1993, and a NFA issued by OEPA. No additional areas of concern have been identified.

Project Parcel ID #	ORPS Address (Description)	Impact Area (acres) (Temporary/ Permanent)	Database(s)	Construction Activity	Recommendation
143	3200 Burnet Avenue (UC Health)	0.015/0.056	UST, LUST, RCRA-LQG	Sidewalk replacement and station	File review of ORPS Facility #3100807 indicates a combination of inactive and active underground storage tanks. The site is associated with UC Health, and no additional areas of concern have been identified. Additionally, review of USEPA's Enforcement and Compliance History Online (ECHO) website did not identify any violations at the site.
127-132	3425 Burnet Avenue and 3443 Burnet Avenue (Vacant Lots)	0/0.001	UST, LUST, RCRA-SQG	Roadway Resurfacing and Sidewalk	File review for ORPS Facility #31002020 indicates underground storage tanks were removed in 1996 and a NFA was issued. No additional concerns have been identified. Additionally, the Cincinnati Planning Commission has approved a development for this parcel that includes 300 apartments, parking garage, and commercial development with construction beginning in the summer of 2026.
114-124	405 Rockdale Avenue (Vacant Lots)	0/0	UST, LUST	Sidewalk	File review of ORPS Facility #31004526 indicates closure of underground storage tanks with a NFA issued by OEPA. No additional areas of concern have been identified.
113	400 Rockdale Avenue (Vacant Lots)	0/0	RCRA-SQG	Sidewalk	No additional analysis required due to low potential for soil/groundwater contamination
60-63	3916 Reading Road (Vacant Lot)	0.006/0.006	LUST	Sidewalk	File review of the ORPS orphan site indicates closure of underground storage tanks with a NFA. No additional areas of concern have been identified.
59	4500 Reading Road (PKI, Inc – Powder Kote Industries)	0/0	RCRA	Sidewalk replacement	No additional analysis required due to low potential for soil/groundwater contamination
56	4517 Reading Road (VIP Smoke Shop)	0/0	RCRA-SQG	Sidewalk replacement	No additional analysis required due to low potential for soil/groundwater contamination
55	Reading Road (No Address)	0/0	UST, LUST, RCRA-SQG	Roadway	No temporary or permanent right-of-way is required from or near the parcel. No additional concerns have been identified.
54	4531 Reading Road (Talbert House)	0/0	RCRA	Sidewalk Replacement	No additional analysis required due to low potential for soil/groundwater contamination.

Project Parcel ID #	ORPS Address (Description)	Impact Area (acres) (Temporary/ Permanent)	Database(s)	Construction Activity	Recommendation
53	4545 Reading Road (BP Gas Station)	0/0	UST, LUST, RCRA-SQG	Sidewalk and driveways	Review of ECHO did not identify any violation of the site. File review of ORPS Facility #31001515 indicates that petroleum releases occurred in 1991 and 2003 and cleanup is on-going. Active underground tanks occur on the parcel and no additional areas of concern have been identified.
17-18	1810 Seymour Road (Taco Bell and former Gas Station)	0/0	UST, LUST, RCRA	Curb ramp/ sidewalk replacement	File review of ORPS Facility #31000074 indicates that all tanks have been removed for the site and a NFA has been issued. No additional area of concern has been identified. The current use of the site is a Taco Bell restaurant
6	7539 Reading Road (RUBIX Food & Gas)	0/0	UST	Curb ramp/ sidewalk replacement	File review for ORPS Facility #31000204 is listed as currently in use with no concerns identified.

Population density along Reading Road is among some of the highest in Hamilton County. The highest densities in the Project area are in neighborhoods between downtown, Over-the-Rhine, and Uptown (Figure 5). These areas are also some of the highest employment areas in Cincinnati. Other high population densities along the Project area are in the Avondale and Bond Hill neighborhoods and near the northern terminus of the Project in Roselawn.

The median age for the census tracts within the Project area is 32.9 years, compared to Hamilton County at 38.1 years. The Project area has a minority population of 54.6%, low-income population of 45.5%, and limited English-speaking population of 0.4%. Hamilton County has a minority population of 36.6%, low-income population of 29.5%, and limited English-speaking population of 0.6%.

Within the Project, 91.8% of persons in the workforce are employed, compared to 95% in Hamilton County. Within the Project, 57.9% of people drive alone to work. Of those who do not use a personal vehicle to commute, 7.7% carpool, 6.3% take public transportation, 14.4% walk, 0.5% bicycle, 1.7% use another method, and 11.5% work from home. For comparison, in Hamilton County, 73.7% of people drive alone to work, 7.7% carpool, 2.8% take public transportation, 2.7% walk, 0.1% bicycle, 1.2% use another method, and 11.8% work from home. This data indicates that people within the Project area utilize different methods of commuting when compared to the county.

I. Community Resources

There are several community resources in the Project area. Community resources include recreational facilities, schools, libraries, governmental facilities, emergency resources, hospitals and doctor offices, and religious institutions (Figure 6 and Table 12).

Figure 5. Population Density

READING ROAD BRT

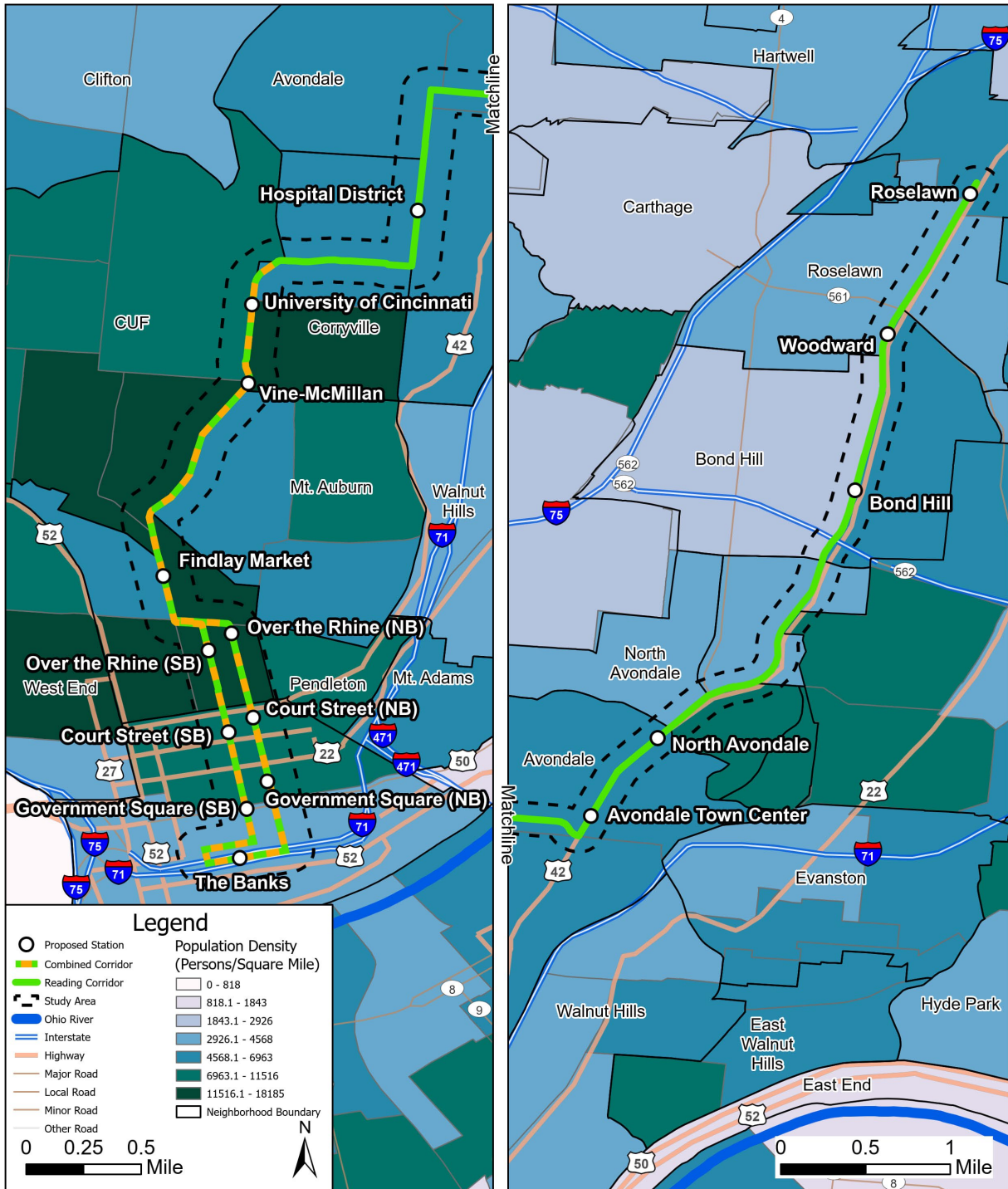
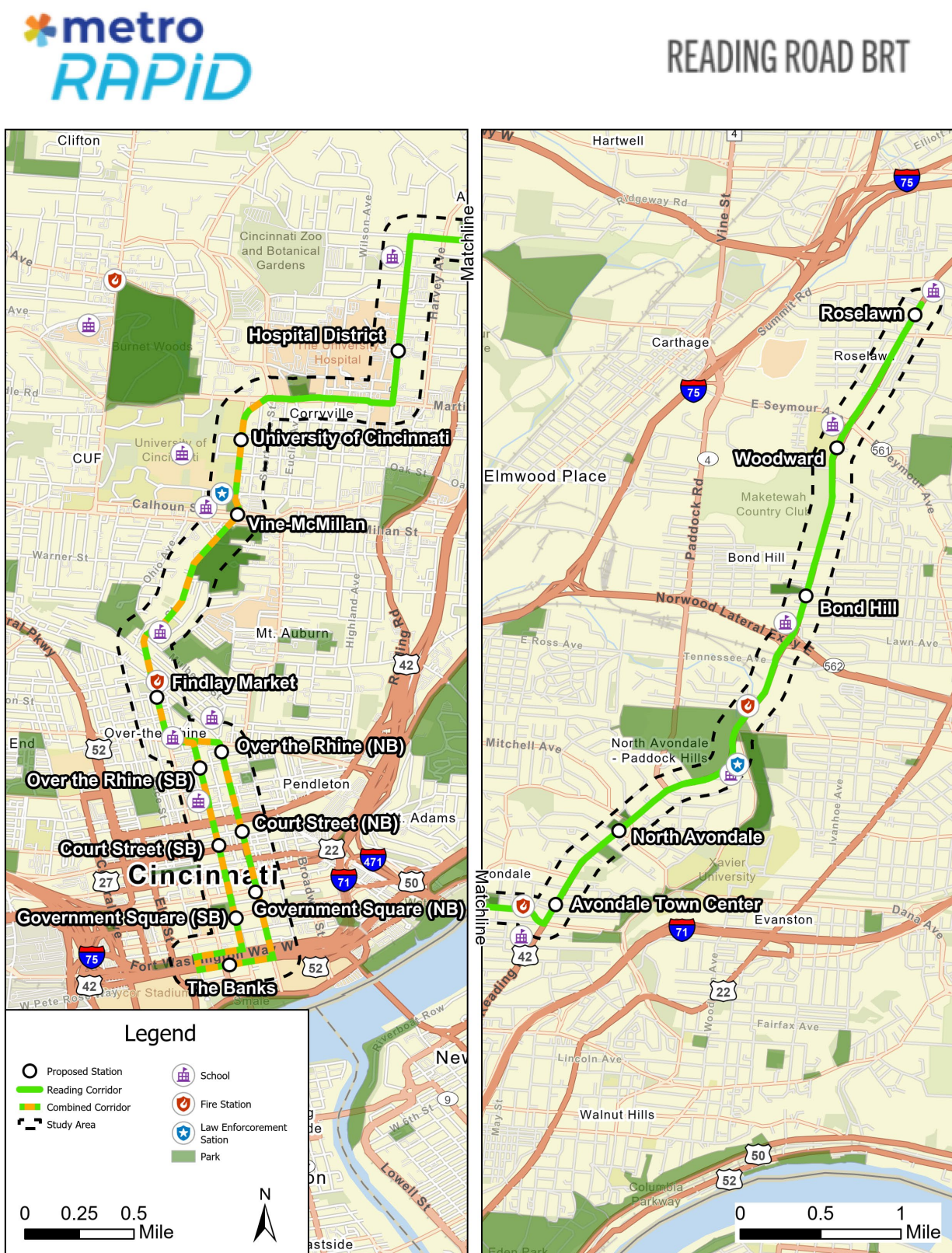


Figure 6. Community Resources



Source: CAGIS, 2024

Table 12. Community Resources within 500 feet of the Project

Community Resource	Type	Address
St Aloysius Educational Center	School	4721 Reading Road
Rockdale Academy	School	335 Rockdale Avenue
Rothenberg Preparatory Academy	School	241 E Clifton Avenue
South Avondale School	School	636 Prospect Place
St. Francis Seraph	School	14 Liberty Street
Corryville Catholic	School	108 Calhoun Street
Woodward Career Technical High School	School	7005 Reading Road
Rising Stars at Vine	School	2120 Vine Street
Dohn Community High School - North Campus	School	7710 Reading Road
Dohn Prep Academy - Avondale Campus	School	4100 Reading Road
University of Cincinnati	School/University	2600 Clifton Avenue
Art Academy of Cincinnati	School/University	1212 Jackson Street
Cincinnati Fire Station E05	Fire Station	6 McMicken Avenue
Cincinnati Fire Station E09	Fire Station	4379 Reading Road
Cincinnati Fire Station E32	Fire Station	650 Forest Avenue
Cincinnati Police Department District 4	Police	4150 Reading Road
Cincinnati Children's Hospital Medical Center	Medical Center	3333 Burnet Avenue
University of Cincinnati Medical Center	Medical Center	3188 Bellevue Avenue
UC Gardner Neuroscience Institute	Medical Center	3113 Bellevue Avenue
Hoxworth Center	Medical Center	3130 Highland Avenue
UC Health Medical Office Building East	Medical Center	3131 Harvey Avenue
Ambrose H. Clement Health Center	Medical Center	3559 Reading Road
Hamilton County Courthouse	Government	1000 Main Street
Environmental Protection Agency	Government	26 Martin Luther King Drive
Roselawn Post Office	Government	1730 Section Road
Avondale Post Office	Government	3493 Burnet Avenue
Queen City Post Office	Government	525 Vine Street
Corryville Post Office	Government	2917 Short Vine Street
US Prison Bureau	Government	36 7 th Street #2107
3T Learning Academy LLC 11	Childcare	7523 Reading Road
Amari James Academy of Early Learning - Roselawn Campus	Childcare	7390 Reading Road
Arlitt Child Development Center	Childcare	47 Corry Boulevard
Champion Childcare	Childcare	4410 Reading Road
Childtime Learning Center	Childcare	550 Main Street, Room 1016
Childtime Learning Center	Childcare	312 Walnut Street
Cozy Home Childcare and Learning Center	Childcare	3559 Reading Road
CWFF Child Development Center	Childcare	430 Forest Avenue
Destiny Childcare and Development Center	Childcare	5550 Reading Road
Generation Hope Childcare and Preschool	Childcare	7502 Griffin Drive
Head Start / Early Head Start Life Learning Center	Childcare	1740 Langdon Farm Road
Hirsch Recreation Center	Childcare	3630 Reading Road
Imani Family Center	Childcare	241 Clifton Avenue
Kiddy Kare Learning Center, Inc.	Childcare	4807 Reading Road
Kiddy Kare Learning Center, Inc.	Childcare	1375 Tennessee Avenue
Kidsville Childcare and Development North LLC	Childcare	1730 Tennessee Avenue
Learning Grove - YWCA Greater Cincinnati	Childcare	898 Walnut Street
Learning Grove - Peaslee Early Learning Center	Childcare	215 14 th Street
Nanny's Multilevel Learning Center, Inc	Childcare	3494 Reading Road
The Salvation Army Citadel	Childcare	114 Central Parkway
These Precious Hands Child Development Center	Childcare	3556 Reading Road
YMCA Early Learning Center (Valley)	Childcare	7617 Reading Road
Zion Temple Christian Academy	Childcare	3771 Reading Road
National Underground Railroad Freedom Center	Institutional/Museum	50 Freedom Way
Cincinnati Reds Hall of Fame and Museum	Institutional/Museum	100 Joe Nuxhall Way
Contemporary Arts Center	Institutional/Museum	44 6 th Street
Greater Cincinnati Coalition for the Homeless	Social Servies	11712 th Street

Community Resource	Type	Address
Tender Mercies	Social Servies	27 12 th Street
Hamilton County Job, Child, and Family Services	Social Servies	222 Central Parkway
Women Helping Women	Social Servies	215 9 th Street #7
Catholic Charities Southwestern Ohio	Social Servies	7162 Reading Road Ste 600
Jefferson Avenue Trail	Trail	Parallel to Jefferson Avenue
Vine Street Trail	Trail	Parallel to Vine Street
Piatt Park	Recreation	100 Garfield Place
Seasongood Square	Recreation	3821 Reading Road
Bond Hill Recreation Area	Recreation	1537 Franklin Avenue
Bond Hill Park	Recreation	5790 Anita Place
Sherman Avenue Ballfields	Recreation	1501 Sherman Avenue
Schiller/Hughes Recreation Area	Recreation	1702 Main Street
Rockdale Playground	Recreation	3480 Harvey Avenue
Hirsch Recreation Center	Recreation	3630 Reading Road
Lawn Recreation Area	Recreation	1720 Lawn Avenue
Grant Playground	Recreation	73 E McMicken Avenue
Findlay Playground	Recreation	1823 Vine Street
Paddock Hills Recreation Area	Recreation	4359 Reading Road
Avon Fields Golf Course	Recreation	4081 Reading Road
Marion Triangle	Recreation	3818 Reading Road
Dr. Martin Luther King Jr. Park	Recreation	37370 Reading Road
Fleishmann Gardens	Recreation	524 Forest Avenue
Gallagher Park (Classen Park)	Recreation	2515 Jefferson Avenue
Inwood Park	Recreation	2308 Vine Street
Rice/Loth Playground	Recreation	3021 Short Vine Street
Jackson Hill Park	Recreation	2001 Eleanor Place
Liberty Street Greenspace	Recreation	1328 Pendleton Street
Bellevue Park	Recreation	2191 Ohio Avenue
Ziegler Park	Recreation	1322 Sycamore Street
Milton Kantor Memorial Courts	Recreation	223 E 13 th Street
The Mercantile Library	Library	38 Fountain Square Plaza
Cincinnati & Hamilton County Public Library	Library	800 Vine Street
Avondale Branch Library	Library	3566 Reading Road

No residential or commercial displacements will occur as a result of the Project. Some minor right-of-way may be required from community resource properties fronting the existing Project roadways, however none would be displaced. Some on-street parking spots will be removed as a result of the Project (Table 3). Parking will continue to be available in parking lots or on side streets in commercial and business areas where parking will be removed. Within downtown, permitted uses by eateries and entertainment businesses are located within the existing right-of-way. These uses include outdoor seating and gathering spaces for businesses. Within the Project, there are seven locations with this type of permitted use. However, none are anticipated to be impacted.

In 2020, the Cincinnati Park Board sponsored a study of the urban tree canopy within the city limits. The study showed the overall urban tree canopy of the City was about 40%, but it also highlighted the inequity of urban tree canopy between neighborhoods. Areas with lower tree canopy generally experience increased heat island effect, have reduced stormwater retention, and increased areas of overland flooding. The City of Cincinnati Parks - Urban Forestry (CPUF) program manages public street trees. Coordination of efforts with the CPUF identified concerns of impacts on street trees as a result of the Project.

To analyze impacts, street trees within adjacent to the Project were identified using Geographic Information Systems data, Google aerial mapping and supplemented by project field survey in areas around stations. There are approximately 1,064 trees within this area of the Project. There are approximately 53 street trees that would need to be removed as part of the Project. Metro will continue to coordinate with CPUF throughout detailed design to minimize the amount of tree removal and overall impacts, but also seek opportunities to provide planting areas within medians, where possible. Impacted trees would be mitigated according to the local requirements within the area disturbed by the Project.

Public transportation represents an alternative to car ownership for transit-dependent households within the Project area. Further, improved transit speed and frequency would increase the number of employment and educational opportunities available to residents within the Project.

Potential negative impacts related to the noise, dust, and travel disruptions would be temporary in nature, occurring for the duration of construction. The Project would not adversely affect community cohesion as it does not change access or travel patterns. The Project is not expected to have adverse impacts on the social or community environment.

II. Community Outreach

Metro's community outreach efforts for the Project have included outreach to the diverse communities within the downtown, Uptown, and along Reading Road. Metro has a public engagement plan that prioritizes inclusive participation, engaging diverse stakeholders in ongoing planning and decision-making. Public engagement will continue through project development to engage the community and receive feedback regarding the Project and Metro Rapid.

Since May 2024, Metro has held over 140 community outreach events for the Project and MetroRapid through various methods, including public meetings and workshops; community events; information booths at business locations and community markets; community councils; festivals; neighborhood organizations presentations; and stakeholder meetings. A list of meetings and events held and the number of attendees is provided in Appendix H.

Four rounds of public engagement meetings have been held to date. Each area included opportunities for the public to provide input. In general, the public is supportive of the Project, no substantial controversy was generated from these community engagement efforts to date.

In December 2024, three engagement open houses meetings were held in locations close to the Project stations. Almost 200 people attended the public meetings which were held in an Open House format with an area for sitting and viewing a presentation, an area to view informational boards, and three areas for viewing maps. These meetings and the number of people that attended each meeting were:

- December 2 (Monday) 4:30 PM to 7:30 PM at the Bond Hill Community Center. There were 30 members of the public that participated in the meeting.
- December 3 (Tuesday) from 11:00 AM to 1:00 PM and from 4:00 PM to 7:00 PM at the Downtown Main Library. Approximately 49 members of the public participated during the 11:00 AM to 1:00 PM session, and approximately 69 members of the public participated in the evening session.
- December 4 (Wednesday) from 4:30 PM to 7:30 PM at the College Hill Recreation Center 5545 Belmont Ave Cincinnati, Ohio 45224. Approximately 50 members of the public participated.

During the second round of engagement in early 2025, public engagement activities included BRT Stakeholder Advisory Group meeting, Metro Staff Open Houses, Community Open Houses, and participation in community events and meetings. Just over 1,000 people participated in the 20 different stakeholder and community meetings and other events held between January 13 and March 6, 2025. These meetings and the number of people that attended each meeting were:

- February 12 - 10:00 AM to 11:30 AM at the Cincinnati Museum Center. Twenty-eight (28) stakeholders participated.
- February 13 – Fountain Square (520 Vine Street) from 11:00 AM to 4:00 PM. Feedback on the vehicle was received from 159 participants including Metro Administrative staff.
- February 24 – Avondale Town Center (3539 Reading Road) from 3:00 PM to 7:00 PM. Feedback on the vehicle and station names was received from 60 participants.
- February 25 – Heart of Northside (4222 Hamilton Avenue) from 3:00 PM to 7:00 PM. Feedback on the vehicle and station names was received from 107 participants.
- February 26 – Downtown Library (800 Vine Street) from 11:00 AM to 2:00 PM and from 4:00 PM to 7:00 PM. Feedback on the vehicle and station names was received from 170 participants.

- March 1 & 2 – Mittenfest at Washington Park (1230 Elm Street) from 11:00 AM to 5:00 PM. Feedback on the vehicle was received from 152 participants on Saturday and another 94 participants on Sunday.

Additional BRT engagement opportunities in February 2025 were the launch of the new name for the Metro BRT service and the need to refine the BRT station names.

A third round of public engagement meetings were held in May 2025. The objective of the May 2025 BRT engagement activities was to demonstrate to the public that their suggestions and comments were heard and used to make modifications to the station location and names. Other secondary objectives included announcing the results of the vehicle testing, presenting the Neighborhood Business District Station type, and reiterating the safety and accessibility of the BRT system. These meetings and the number of people that attended each meeting were:

- May 14 (Wednesday) at the Downtown Library, 800 Vine Street, from 11:00 AM to 2:00 PM and again from 4:00 PM to 7:00 PM. There were 136 people who attended these two meetings.
- May 15 (Thursday) at the Bond Hill Recreation Center, 1501 Elizabeth Place, from 3:00 PM to 7:00 PM. There were 41 people who attended the meeting.
- May 16 (Friday) at the College Hill Recreation Center, 5545 Belmont Avenue, from 3:00 PM to 7:00 PM. There were 32 people who attended the meeting.

In the Fall of 2025, public engagement activities included Stakeholder Advisory Group meetings and participation in community events and meetings. A fourth round of public engagement open houses occurred to provide updates on the Project and Metro Rapid updates as well as to solicit feedback. These meetings and the number of people that attended each meeting were:

- September 25 (Thursday) at the University of Cincinnati from 11:00 AM to 1:00 PM and again from 4:00 PM to 6:00 PM. There were 113 people who participated in the meeting.
- September 29 (Monday) at the Avondale Town Center from 4:00 PM to 6:30 PM and was attended by eight people.
- September 30 (Thursday) at the Downtown Public Library from 4:00 PM to 6:30 PM. The meeting was attended by 113 people.
- October 1 (Wednesday) at the College Hill Recreation Center from 4:00 PM to 6:30 PM. The meeting was attended by 28 people.

Additional coordination has occurred throughout 2026. A summary of Public Engagement materials is provided in Appendix H.

P. Environmental Justice

On January 21, 2025, Executive Order 12898 of February 11, 1994 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations) was revoked.

Q. Use of Public Parkland and Recreation Areas

Section 4(f) of the Department of Transportation Act of 1966 prohibits the use of park and recreational lands and wildlife and waterfowl refuges for transportation projects unless there is no feasible and prudent alternative to the use and the project includes all possible planning to minimize harm to the property. The Project corridor was examined to determine the location of such lands.⁶ The Project is located within 500 feet of 20 existing and planned parks, greenways, and trails:

- Ziegler Park
- Piatt Park
- Grant Playground
- Findlay Playground
- Rockdale Playground

⁶ US Department of Transportation Federal Highway Administration: Office of Planning, Environment, and Realty Project Development and Environmental Review. July 20, 2012. Section 4(f) Policy Paper. Washington, DC 20590. Retrieved from <https://www.environment.fhwa.dot.gov/legislation/section4f/4fpolicy.pdf>.

- Jackson Hill Park
- Inwood Park
- Gallagher Park (formerly known as Classen Park)
- Sherman Avenue Recreation Area and Ballfields
- Schiller/Hughes Recreation Area
- Rice/Loth Playground
- Fleishmann Gardens
- Milton Kantor Memorial Courts
- Hirsch Recreation Center
- Dr. Martin Luther King Jr. Park
- Seasongood Square Park
- Marion Triangle
- Avon Fields Golf Course
- Paddock Hills Recreation Area (Dante Evans Brown and Darrell Lane Play Field)
- Bond Hill Recreation Area and Park

Of the parks within 500 feet of the Project, Seasongood Square Park, located on Reading Road between Clinton Spring Avenue and Fred Shuttlesworth Circle, and Paddock Hills Recreation Area (Dante Evans Brown and Darrell Lane Play Field) will require temporary and/or permanent right-of-way. Acquisition from Seasongood Square Park (0.012-acre temporary easement and 0.020-acre permanent) is needed for widening for the stop shelter and boarding. A temporary easement of 0.02-acre will be needed from the Paddock Hills Recreation Area to accommodate construction. An evaluation of Section 4(f) properties is further discussed in Section W.

Section 6(f) is included in the Land and Water Conservation Fund (LWCF) Act of 1965, which provides funds and matching grants to federal, state, and local governments to acquire land and water for recreational purposes. Section 6(f) states that those properties acquired or developed with LWCF funds will not be converted to a use other than public outdoor recreation without the approval of the U.S. Secretary of the Department of the Interior, acting through the National Park Service and at the request of the state delegate/state liaison officer. Under the LWCF Act, if there is a conversion of a Section 6(f) resource (in whole, or in part), to a non-recreational use, replacement of the property is required.

One property within the Project area was developed with LWCF assistance. The City of Cincinnati received funding in 1975 for an addition to Fleishmann Gardens, located at 524 Forest Avenue.⁷ Fleishmann Gardens is a 5.47 acres park with landscaped gardens and a stone path leading down steps to an evergreen maze. The Project would not convert any land from this park into another use since no acquisition of land is required at this location. Therefore, no Section 6(f) property would be impacted by the Project.

R. Impacts on Wetlands

The 1977 Executive Order 11990, *Protection of Wetlands*, under the authority of NEPA, and implemented by the U.S. Department of Transportation (USDOT, Order 5600.1A), requires that transportation facilities plan and construct projects to avoid and minimize impacts to wetlands to the fullest extent practicable.^{8,9,10} USDOT Order 5660.1A further requires an analysis of potential project impacts to wetlands. In addition, per Section 404 of the Clean Water Act, infrastructure development that discharges dredge or fill material into wetlands or Waters of the U.S. is regulated by the U.S. Army Corps of Engineers (USACE) and requires permit applications.¹¹

⁷ The Land and Water Conservation Fund, Trust for Public Land. <https://lwcf.tplgis.org/mappast/>. March 2025.

⁸ The President. Executive Order 11990 of May 24, 1977. *Protection of Wetlands*. Federal Register. Vol. 42, No. 26961. Retrieved from <https://www.epa.gov/cwa-404/protection-wetlands>

⁹ National Environmental Policy Act of 1969, as amended (Pub. L. 91 190, 42 U.S.C. 4321-4347, January 1, 1970, as amended by Pub. L. 94 52, July 3, 1975, Pub. L. 94 83, August 9, 1975, and Pub. L. 97 258, § 4(b), Sept. 13, 1982). Retrieved from https://energy.gov/sites/prod/files/nepapub/nepa_documents/RedDont/Req-NEPA.pdf

¹⁰ U.S. Department of Transportation (USDOT). August 24, 1978. Order 5660.1A. *Preservation of the Nation's Wetlands*. Retrieved from <http://www.dot.ca.gov/ser/vol1/sec1/ch1fedlaw/USDOTOrder56601A.pdf>

¹¹ Clean Water Act. 1972. Section 404 (33 U.S.C. 1344). Retrieved from <https://www.epa.gov/cwa-404/clean-water-act-section-404>

Wetland vegetation communities were classified according to the *Classification of Wetlands and Deepwater Habitats of the United States*, commonly referred to as the Cowardin Classification System. Wetlands within the environmental study corridor (ESC) were assessed using the OEPA *Ohio Rapid Assessment Method for Wetlands v. 5.0* (ORAM) to determine the ecological quality and level of disturbance. The ESC is approximately 378.4 acres and is of variable width along the Project (Appendix I, Figure 2). The ESC extends beyond the area necessary to construct the Project in order to evaluate potential impacts from construction and operation of the Project. Streams were identified by the presence of a defined bed and bank, and evidence of an ordinary high water mark (OHWM). No streams, wetlands, or open water features were identified for the Project which was surveyed on October 28, 2024 through field review. The results of the desktop review and field surveys are provided in Appendix I.

According to the National Wetland Inventory (NWI) maps of the Covington, Kentucky, Cincinnati East, Ohio, and Cincinnati West, Ohio quadrangles, there are two mapped NWI features within the ESC (Appendix I, Figure 2). The first is a Palustrine Unconsolidated Bottom, Intermittently Exposed, Excavated (PUBGx) resource mapped within Inwood Park. While mapped in the ESC, this resource would not be impacted by operation or construction of the Project. The other NWI resource mapped in the ESC is a Riverine, Intermittent Stream Bed, Seasonally Flooded (R4SBC) near Victory Parkway (Appendix I, Figure 2) and is associated with Ross Run. In the vicinity of the Project, this resource is captured (in an underground pipe), and will not be impacted by construction or operation.

During environmental surveys for the Project, the ecologists did not identify any wetlands. No impacts to wetland or stream resources are anticipated to result from the Project.

S. Floodplain Impacts

The 1979 USDOT Order 5650.2, *Floodplain Management and Protection*, requires agencies to include detailed floodplain analyses if a project is located within a floodplain.¹² The Federal Emergency Management Agency's (FEMA) Flood Insurance Rate map (FIRM) was reviewed to assess the locations and impact of the project on floodplains.¹³

According to FEMA FIRM Panels 39061C0332F, effective February 16, 2012, and FIRM Panels 39061C0219E, 39061C0229E, 39061C0236E, 39061C0237E, and 39061C0238E, effective February 17, 2010, approximately 4.7 acres of the ESC are within mapped 100-year floodplain areas of the Ohio River and 2.2 acres are within mapped Ohio River floodway, as shown in Appendices A and I. At this location, the Project is on existing structure on Second Street, and no impacts to floodplains are anticipated.

T. Water Quality, Navigable Waterways, & Coastal Zones

The Clean Water Act of 1977, as amended, regulates waters of the U.S. and water quality, while Section 10 of the Rivers and Harbors Act of 1899, as amended (33 USC § 403), regulates navigable waterways.^{14,15} As stated previously, Ross Run near Victory Parkway is a R4SBC mapped NWI resource, however in the vicinity of the Project, it is captured in an underground pipe and will not be impacted by construction or operation.

During environmental surveys for the Project, no streams were identified. Representative photographs of the upland verification data point are provided in Appendix I. Additionally, no ponds or open water habitat were identified for the Project during the field surveys. Additionally, the Project is not within a coastal zone management area.

U. Impacts on Ecologically-Sensitive Areas and Endangered Species

Species that are in danger of becoming extinct or are in danger of becoming extinct within the foreseeable future, along with their designated habitat, are protected under the Endangered Species Act (ESA) of 1973

¹² USDOT. April 23, 1979. Order 5650.2. Floodplain Management and Protection. Retrieved from <https://www.fhwa.dot.gov/engineering/hydraulics/policymemo/order56502.pdf>

¹³ Department of Homeland Security, FEMA Flood Map Service Center. Retrieved from <https://msc.fema.gov/portal>

¹⁴ Clean Water Act. 1972. Section 404 (33 U.S.C. 1344). Retrieved from <https://www.epa.gov/cwa-404/clean-water-act-section-404>

¹⁵ River and Harbor Act of 1899. 33 USC § 401 et seq.

(16 USC § 1531). Section 7 of the ESA requires consultation with the USFWS if a project receiving federal funding may affect listed endangered or threatened species or their designated habitat¹⁶.

An Official Species List was acquired from the USFWS Information for Planning and Consultation (IPaC) web application on March 13, 2026. The Official Species List included nine federal species of concern, including three bat species, five freshwater mussel species, and one federal candidate insect species. It should be noted that candidate species are not provided protection under the ESA. No critical habitat areas occur in the vicinity of the ESC. The Official Species List is included in Appendix J.

Information from the USFWS IPaC has indicated that the ESC is within the range of multiple state and federally protected bat species. The IPaC-generated Consistency Letter indicated an affect determination of “not likely to adversely affect” (NLAA) for the Indiana bat (*Myotis sodalis*), the northern long-eared bat (*Myotis septentrionalis*) and the tricolored bat (*Perimyotis subflavus*) (Appendix J). In addition, based on habitats within the Project area, impacts to other federally listed species are not anticipated (Table 13). USFWS issued a concurrence letter on March 17, 2026 (Appendix J).

Table 13. Listed Species Identified in the ESC

Species	Federal Listing	Habitat Description	Potential Habitat within the ESC	Impact Assessment
Indiana bat (<i>Myotis sodalis</i>)	Endangered	Winter hibernacula are provided by caves and mines. Summer roost habitat typically includes live or dead trees with exfoliating bark, crevices, or cavities that can be used for roosting. Open sub-canopy areas and flight corridors are important to allow maneuvering during foraging. Proximity to water sources provides a greater density of insect prey.	Potentially suitable summer habitat may be provided by individual trees and woodlots.	Based on the USFWS IPaC DKey results, the Project has a USFWS affect determination of NLAA for Indiana bat and northern long-eared bat. In addition, any tree clearing is expected to occur during the October 1 to March 31 inactive season. As a result, no impacts to these species are anticipated.
northern long-eared bat (<i>Myotis septentrionalis</i>)	Endangered			
tri-colored bat (<i>Perimyotis subflavus</i>)	Proposed Endangered			
salamander mussel (<i>Simpsonaias ambigua</i>)	Proposed Endangered	Habitat is typically provided by medium to large rivers where they are found under flat boulders in silt and sand substrates.	Potentially suitable habitat may be provided by Mill Creek.	No in-water work is anticipated; therefore, no impacts are anticipated.
fanshell (<i>Cyprogenia stegaria</i>)	Endangered	This mussel is typically found in medium to large rivers. It buries itself in sand or gravel in deep water of moderate current.		
pink mucket (<i>Lampsilis orbiculata</i>)	Endangered	This mussel is found in mud and sand and in shallow riffles and shoals swept free of silt in major rivers and tributaries.		

¹⁶ Department of the Interior. U.S. Fish and Wildlife Service. 1973. Endangered Species Act of 1973 as Amended through the 108th Congress. Washington, D.C. 20240

Species	Federal Listing	Habitat Description	Potential Habitat within the ESC	Impact Assessment
sheepnose (<i>Plethobasus cyphus</i>)	Endangered	Lives in shallow areas with moderate to swift currents in larger rivers and streams.		
snuffbox (<i>Epioblasma triquetra</i>)	Endangered	Typically found in small to medium-sized creeks and some larger rivers, in areas with a swift current.		
monarch butterfly (<i>Danaus plexippus</i>)	Proposed Threatened	Habitat is generally provided by stands of milkweed in developed and undeveloped areas.	Potentially suitable habitat was not identified within the ESC.	Impacts to this species are not anticipated as a result of the Project.

V. Impacts on Safety and Security

To ensure the safety of all riders, Metro partners with and provides funding for the City of Cincinnati Police Department to monitor buses, bus stops, and areas in and around transit facilities. The BRT buses would be equipped with audio and video surveillance equipment, and could be equipped with a driver barrier, to protect the driver. Additionally, Project station design was completed with reviews by certified professionals with Crime Prevention Through Environmental Design qualifications. As such, safety and security measures would be implemented for the Project, both during construction and following the commencement of operations. No adverse impacts to safety or security are anticipated as a result of the Project.

The Project has the potential to enhance the safety and security of the Project area for all users due to the infrastructure and pedestrian improvements. The BRT stations would include new or restriped crosswalks, enhanced accessibility through sidewalks and ramps, pedestrian signals, and transit signals, where appropriate.

Additionally, for the Project, the City of Cincinnati has developed an ordinance to minimize loitering within transit zones throughout the city and provide law enforcement with the ability to enforce the issue. The ordinance covers areas within the station areas and is modelled on an existing ordinance for the Cincinnati Connector, which allows enforcement against loitering at streetcar zones to ensure public safety.

W. Section 4(f) Evaluation

This section provides documentation necessary to support determinations required to comply with the provisions of Section 4(f) of the Department of Transportation Act of 1966, as amended.

I. Introduction

Section 4(f) of the US Department of Transportation (USDOT) Act of 1966, as amended in 1983 (49 U.S.C. Section 303 and 23 U.S.C 138), was enacted to preserve publicly owned land used for recreation, wildlife, and waterfowl refuges. Section 4(f) properties also include public and private historic resources that are listed in or eligible for inclusion in the NRHP as well as archaeological sites that are listed in or eligible for inclusion in the NRHP and warrant preservation in place.

Section 4(f) stipulated that FTA and other USDOT agencies cannot approve the use of land from publicly owned parks, recreational areas, wildlife and waterfowl refuges, or public and private historical sites unless the following conditions apply:

- There is no feasible and prudent alternative to the use of the land.
- The action includes all possible planning to minimize harm to the property resulting from use.

If no prudent and feasible avoidance alternative exists, only the alternative that causes the least overall harm and includes all possible planning to minimize harm to Section 4(f) properties may be selected (23 CFR 774.3(c)(1)). The following factors are to be considered when conducting the least harm analysis:

- Ability to mitigate adverse impacts to each Section 4(f) property.
- Relative severity of remaining harm, after mitigation, to the protected activities that qualify each property for Section 4(f) protection.
- Relative significance of each Section 4(f) property.
- Views of the officials with jurisdiction over each Section 4(f) property.
- Degree to which each alternative meets the Purpose and Need.
- After reasonable mitigation, the magnitude of any adverse impacts to resources not protected by Section 4(f).
- Substantial differences in costs between the alternatives.

II. Section 4(f) Use Definitions

As defined in 23 CFR 774.17, the “use” of a protected Section 4(f) property occurs when any of the following conditions are met:

Direct Use – A direct use of a Section 4(f) property occurs when property is permanently incorporated into a transportation project. This may occur as a result of partial or full acquisition of a fee simple interest, permanent easement, or temporary easement that exceeds regulatory limits.

Temporary Use – A temporary use of a Section 4(f) property occurs when there is a temporary occupancy of property that is considered adverse in terms of the preservation purposes of the Section 4(f) statute. A temporary occupancy of property does not constitute a use of a Section 4(f) resource when all of the following conditions are satisfied:

- Duration is less than the time needed for construction of the project and there is no change in ownership of the land;
- The nature and magnitude of the changes to the Section 4(f) property are minimal;
- There are no anticipated permanent adverse physical impacts, nor is there interference with the protected activities, features, or attributes of the property on either a temporary or permanent basis;
- The land being used will be fully returned to a condition at least as good as that which existed prior to the project; and
- There is a documented agreement of the official(s) with jurisdiction over the Section 4(f) resource regarding the above conditions.

Constructive Use – A constructive use of a Section 4(f) property occurs when a transportation project does not incorporate land from the resource, but the proximity of the project results in impacts so severe that the protected activities, features, or attributes that qualify the resource for protection under Section 4(f) are substantially impaired (23 CFR 774.15).

III. De Minimis Impacts

The requirements of Section 4(f) are satisfied with respect to a Section 4(f) resource if it is determined by the FTA that a transportation project would have only a “de minimis impact” on the Section 4(f) resource. The provision allows avoidance, minimization, mitigation, and enhancement measures to be considered in making the de minimis determination. The official(s) with jurisdiction (OWJ) over the resource must be notified of the agency’s determination. De minimis impacts are defined in 23 CFR 774.17 as follows:

For parks, recreation areas, and wildlife/waterfowl refuges, a de minimis impact is one that would not adversely affect the features, attributes, or activities qualifying the property for protection under Section 4(f), and the OWJ has concurred with this determination after there has been a chance for public review and comment. OWJ coordination letters are found in Appendix K.

For historic sites, de minimis impact means that the FTA has determined, in accordance with 36 CFR part 800, that either no historic property is affected by the project, or the project would have “no adverse effect” on the property in question.

IV. Description of the Project

The Project will connect The Banks in downtown with the University of Cincinnati in Uptown and destinations north on Reading Road up to the northern terminus in Roselawn. The Project will utilize a mixture of dedicated bus lane configurations to provide service along the route. Project stations will feature improved bicycle and pedestrian facilities, raised platforms for level boarding, shelters, and real-time information and fare payment infrastructure. The Project will also include the acquisition of 12 new, 60-foot articulated buses, including ten buses for peak service and two spares.

V. Description of Section 4(f) Properties

a. Parks, Greenways, and Trails

The Project is located within 500 feet of 20 existing and planned parks, greenways, and trails (Table 14).

Table 14. Public Parks and Trails within 500 feet of the Project

Park Name	Managing Entity	Total Area / Length	Area within 500 feet of the Project	Recreational Use
Ziegler Park	Cincinnati Center City Development Corporation	1.25 acres	1.25 acres	Pool Playground Basketball court Table tennis
Piatt Park	Cincinnati Parks	1.75 acres	0.10 acre	Benches/Picnic Tables Paved Walkway Statues
Grant Playground	Cincinnati Recreation Commission	1.23 acres	1.14 acres	Playground Basketball court
Findlay Playground	Cincinnati Recreation Commission	1.41 acres	1.41 acres	Picnic shelter Playground
Rockdale Playground	Cincinnati Recreation Commission	2.17 acres	0.40 acre	Playground Basketball Court Ballfield
Jackson Hill Park	Cincinnati Parks	13.25 acres	0.86 acre	Picnic shelter Playground
Inwood Park	Cincinnati Parks	19.90 acres	10.65 acres	Pavilion Playgrounds Picnic shelter Paved walking path Lake/Water feature
Gallagher Park (Classen Park)	Cincinnati Parks	1.45 acres	1.45 acres	Benches Drinking Fountain Leashed Dogs Welcome Paved Walkway Picnic Tables
Sherman Avenue Recreation Area and Ballfields	Cincinnati Recreation Commission	6.17 acres	4.11 acres	Ballfields
Schiller/Hughes Recreation Area	Cincinnati Recreation Commission	0.31 acre	0.05 acre	Basketball Courts
Rice/Loth Playground	Cincinnati Recreation Commission	0.21 acre	0.08 acre	Playground

Park Name	Managing Entity	Total Area / Length	Area within 500 feet of the Project	Recreational Use
Fleishmann Gardens	Cincinnati Parks	5.47 acres	5.07 acres	Landscaped gardens, the largest ginkgo tree in the state, and a stone path leads down steps to an evergreen maze
Milton Kantor Memorial Courts	Cincinnati Parks	0.20 acre	0.20 acre	Basketball Courts
Hirsch Recreation Center	Cincinnati Recreation Commission	6 acres	4.22 acres	Walking Trail Ballfields Playground
Dr. Martin Luther King Jr. Park	Cincinnati Parks	6.25 acres	3.92 acres	Playground Picnic area
Seasongood Square Park	Cincinnati Parks	2.70 acres	2.70 acres	Benches Paved trails Picnic area Playground
Marion Triangle	Cincinnati Parks	0.16 acre	0.16 acre	Benches Paved walkway
Avon Fields	Cincinnati Recreation Commission	110 acres	25.5 acres	Public golf course
Paddock Hills Recreation Area (Dante Evans Brown and Darrell Lane Play Field)	Cincinnati Recreation Commission	2.25 acres	2.25 acres	Youth ballfield Basketball court
Bond Hill Park and Recreation Area	Cincinnati Recreation Commission	5.07 acres	2.21 acres	Ballfields Pool Basketball court Playground

b. National Register of Historic Places-Listed and Eligible Properties

There are 30 individual NRHP listings within the APE (Table 15). Of those listings, there are 13 NRHP-eligible historic properties within the immediate vicinity of a station location (Table 15).

Table 15. NRHP-Listed Properties within Project APE

Resource Name	Location	NRHP Reference #	Criteria	Station Location
St Aloysius Orphanage	4721 Reading Rd	12000835	A	N/A
The Alameda Flats	3580-3586 Reading Rd	14000293	A & C	N/A
Poinciana Flats	3522 Reading Rd	14000294	A & C	Avondale Town Center
The Crescent	3719 Reading Rd	14000336	A & C	N/A
A. E. Burckhardt House	400 Forest Ave	80003038	C	N/A
Walter Field House	3725 Reading Rd	80003053	C	N/A
Grace Church	3626 Reading Rd	82003581	C	N/A
The South Crescent Arms	3700 Reading Rd	MP100006851	A & C	N/A
Isaac M Wise Temple-Center	3771 Reading Road	SG100003527	A & C	North Avondale
Edward Hart House	818 Glenwood Avenue	SG100008694	B	N/A
Union Trust Building	36 4 th Street	08000802	C	N/A
Hotel Metropole	609 Walnut Street	09000443	A	N/A

Resource Name	Location	NRHP Reference #	Criteria	Station Location
United States Post Office and Court House	100 5 th Street	15000184	C	Government Square (Southbound)
Old St. Mary's Church, School and Rectory	123 13 th Street	76001439	A & C	N/A
Tyler Davidson Fountain	5 th Street (Fountain Square)	79001854	C	N/A
Gwynne Building	602 Main Street	79001856	C	Government Square (Northbound)
Alms and Doepke Dry Goods Company	222 Central Parkway	80003035	C	N/A
Theodore Krumberg Building	1201 Main Street	82001467	C	N/A
Nathaniel Ropes Building	917 Main Street	82003585	C	Court Street (Northbound)
Underwriters Salvage Corps	110-112 8 th Street	82003589	A	N/A
Young Women's Christian Association of Cincinnati	898 Walnut Street	82003591	A & C	Court Street (Southbound)
Main and Third Street Cluster	300-302, 304-306 Main Street and 208-210 3 rd Street	83001984	A & C	N/A
Main-Third Street Grouping	208-210 3 rd Street and 300-318 Main Street	83004654	C	N/A
Courtland Flats	117-121 Court Street	84001046	C	N/A
Formica Corporation-Crystal Arcade-Contemporary Arts Center Building	120 4 th Street	RS100007941	C	N/A
Brunswick--Balke--Collender Building	130-132 6 th Street	SG100000568	A & C	N/A
Reakirt Building	126-128 6 th Street	SG100000569	C	N/A
First National Bank Building	105 4 th Street	SG100000570	C	N/A
Traction Company Building	432 Walnut Street	SG100001270	C	Government Square (Southbound)
Mercantile Library Building	414 Walnut Street	SG100006914	A & C	N/A

VI. Use of Section 4(f) Properties

The following sections describe use of Section 4(f) properties. An assessment has been made as to whether any permanent or temporary occupancy of a property would occur and whether the proximity of the Project would cause any effects (such as access disruption, noise, vibration, or aesthetic) that would substantially impair the features or attributes that qualify the resource for protection under Section 4(f) and, therefore, constitute a use (Table 16). Figures showing the location of potential impacts from the Project are located in Appendix K. The Project is anticipated to have no adverse effect to NRHP-listed or eligible properties in the APE. A de minimis impact would apply to all of the historic sites in the APE.

Table 16. Section 4(f) Uses

Section 4(f) Resource	Estimated Acreage of Use	Impact	Section 4(f) Use
Seasongood Square 3821 Reading Road	0.012-acre temporary easement; 0.020 acre permanent	- Strip right-of-way to accommodate widening of roadway, station and sidewalk - No recreational uses impacted - Potential for temporary closures to pedestrian pathways for construction. Access to park would remain open.	De minimis
Paddock Hills Recreation Area (Dante Evans Brown and Darrell Lane Play Field) 4359 Reading Road	0.02-acre temporary easement	- Reconstruction of driveway and grading behind proposed sidewalk. - No recreational uses impacted - Potential for temporary closure to parking lot for construction.	Temporary Use

VII. Measures to Minimize Harm

While care was taken to keep construction limits within the existing right-of-way, some right-of-way will be required for the Project. In areas of BRT stations, the Section 4(f) properties will be impacted during construction and returned to their current use following construction. Construction areas will be kept to a minimum to allow for continued use of remaining areas of parks during construction.

At Seasongood Square Park, a strip right-of-way acquisition is needed for construction of a new BRT station and boarding area. No recreational uses within the property would be impacted. Therefore, there will only be de minimis impact to Seasongood Square Park as defined under 23 CFR 774.17. At Paddock Hills Recreation Area, a temporary easement will be needed during construction. No recreational use will be impacted. Access to the facility may be limited during construction.

VIII. Coordination

The public was provided the opportunity to review and comment on the potential Section 4(f) uses in Fall 2025. A summary of public outreach is located in Appendix H. Coordination with the Cincinnati Parks, as the OWJ of Seasongood Park, has occurred and is provided in Appendix K. Concurrence from Cincinnati Parks was provided on March 19, 2026 for Seasongood Square Park. Coordination with the Cincinnati Recreation Commission, as the OWJ of Paddock Hills Recreation Area, has occurred and concurrence was provided on April 8, 2026 for the potential use to the Section 4(f) property (Appendix K).

IX. Determination of Section 4(f) Use

A de minimis impact was determined for one Section 4(f) property that will have a use as a result of the Project. Seasongood Square Park would have a strip right-of-way acquisition and no recreational use within the park would be impacted. Cincinnati Parks concurred with the use determination on March 19, 2026.

A temporary occupancy use is recommended for the Paddock Hills Recreation Area property that would be impacted during construction. The public recreational resource would be returned to their existing conditions following construction. The Cincinnati Recreation Commission concurred with the use determination on April 8, 2026.

On April 17, 2026, FTA notified the Ohio Historic Preservation Office that the Project would have no adverse effect to historic sites, including NRHP-eligible and listed properties. The OHPO concurred with the findings on May 15, 2026.

X. Impacts Caused by Construction

Construction would primarily consist of earth removal and hauling, grading, repaving and restriping of lanes, sidewalk improvements, other infrastructure improvements, and placement of shelters and other station features. Construction would primarily occur during daylight hours, accounting for peak travel hours to minimize traffic delays wherever possible.

Construction activities are expected to result in minor temporary effects, which would be mitigated as described in the following sections:

I. Parks and Recreation

Temporary impacts to parks and recreation would occur due to construction for roadway widening and construction of stations and ramps. The impacts are anticipated to only be during construction and facilities will be returned to their existing condition. Access to parks will be maintained during construction.

II. Unanticipated Archaeological or Historic Resources

If any historic or archaeological artifacts are identified during construction Metro will notify FTA within 48 hours. No further construction in the area of the discovery will proceed until the requirements of 36 CFR Section 800.13 have been satisfied. FTA will consult with OHPO and federally recognized Native American tribes, as appropriate, to record, document and evaluate the artifacts eligibility for the NRHP. If necessary, a plan for avoiding, minimizing, or mitigating adverse effects will be developed.

Historic and prehistoric human remains are subject to protection under Ohio Revised Code (ORC) Sections 2909.05 and 2927.11. As such, if human remains are discovered during construction, work in that portion of the Project will stop immediately. The Project Engineer will immediately contact Metro who will coordinate with local law enforcement, the County Coroner, and FTA.

III. Noise and Vibration

a. Construction Noise

Elevated noise levels from construction activities have the potential to disturb and annoy community receptors while construction activities are occurring. For most construction equipment, diesel engines are typically the dominant noise sources. For other activities, such as impact pile driving and jackhammering, noise generated by the actual process dominates. Most of the construction would consist of site preparation, modifying the roadways, and other minor construction that should occur primarily during daytime hours. At some locations, more extensive work could occur. Nighttime work may be required in some locations or for specific activities and would be governed by permit from the City of Cincinnati.

Construction noise predictions at noise-sensitive locations depend on the types of equipment used during each construction phase, the duration of the noise, the time of day or night, the distance from the construction activities to the sensitive receptors, and the land use sensitivity of the receptors. Conducting a construction noise impact assessment requires knowledge of the equipment likely to be used, the duration of its use, and the way it would be used by a contractor. Such detailed information is not available at this stage in the project, so construction noise can only be qualitatively described in this assessment, however, typical equipment that will likely be used include excavators, truck mounted lifts/cranes, portable lifts, bobcats, small dozer, asphalt pavers, concrete trucks, dump trucks, jack hammers, concrete saws, water/tanker trucks, and street sweepers.

Specific construction scenarios would be developed during the preparation of a Construction Noise and Vibration Control Plan, when more information on methods, equipment, and durations is available. For typical roadway construction activities which would be expected for the Project, the potential for construction noise impacts would extend to within several hundred feet from the roadway. However, construction noise mitigation measures are readily available to minimize potentially excessive noise.

b. Construction Vibration

Construction activities can create the potential for damage to nearby structures at close distances due to high impact activities such as pile driving, hoe rams, and vibratory compaction. Most limits on construction vibration are based on reducing the potential for damage to nearby structures. Although construction vibrations are only temporary, it is still reasonable to assess the potential for human annoyance as well.

Conducting a construction vibration impact assessment requires knowledge of the equipment likely to be used, the duration of its use, and the distances to the receptors. Such detailed information is not available at this stage in the project, so construction vibration can only be qualitatively described in this assessment.

As a conservative approach, structural Category III buildings with less competent masonry foundation, horizontal timber framing, and any interior finish has been used to assess the potential for damage from construction vibration. A vibration criterion of 0.20 inches/second PPV or 94 VdB has been used to assess potential damage impact. With no pile driving expected for the project, the highest levels of construction vibration would be generated by vibratory compaction. The potential for damage from this activity would be limited to within 25 feet and the potential for human annoyance would be limited to within 135 feet. All other activities would have shorter vibration screening distances for both the potential for damage and human annoyance.

IV. Safety and Security

To ensure the safety of contractors and the general public, Metro will implement Best Management Practices. This includes limiting access to active construction areas to only required personnel. This would be established through secured fencing and monitoring by construction personnel. Metro would also require an on-site safety plan to be developed, maintained, and implemented by the contractor during construction. This would be critical during areas where deep excavation may occur.

V. Disruption of Utilities

Throughout the Project, existing utilities are present, including underground gas, fiber optic, cable, telephone, electric, water, sanitary sewers, storm sewers, and thermal. In addition, above-ground, electric, telephone, and cable are within the Project limits. Utility relocation at station areas is likely to consist of valves, fire hydrants, utility poles, utility boxes, and vaults. Where utility access is required underneath station areas, utility relocations may be required; however, this work would be short-term in duration. In general, the utility company would install new features prior to tying into the existing service. Prior to the tie-in period, utilities notify impacted customers of the potential short-term disruption of service. Additionally, prior to any utility relocations, utility companies will obtain permits through the City of Cincinnati. The utility relocation permit would specify any restrictions for outages and timing of utility relocation.

For potential utility relocation, all utility companies within the Project limits have been contacted, responses have been received, and their plans are being incorporated into the survey files. In addition, monthly utility coordination meetings have occurred to address relocations.

VI. Disposal of Debris and Spoil

Any material to be disposed of is likely to be the result of site preparation activities, such as demolition materials, vegetation clearance, and general construction debris. There may also be the removal of any soil unsuitable for construction or soil volumes in excess of that needed for facility construction. Responsibility for disposal will be that of the contractor, subject to all applicable regulations and requirements. The construction contractors will follow all applicable laws and regulations concerning the proper disposal of construction debris and spoil.

VII. Access and Distribution of Traffic

During construction, small areas of adjoining parcels at stations may be temporarily impacted by minor ground surface disturbance to accommodate concrete work. Partial road and sidewalk closures may be needed to accommodate construction, although these closures will be temporary and short-term. Access to all properties would be maintained during construction. Detailed maintenance of traffic plans would be developed during final design in coordination with Office of Engineering to ensure safety of all workers and users during construction and to ensure emergency vehicle access is not impeded. Additionally, any parking

spaces temporarily removed during construction would be coordinated with Office of Engineering and the adjoining businesses/residences to minimize the temporary impacts.

VIII. Water Quality and Runoff

Construction activities may adversely affect water quality through erosion and sedimentation. Erosion is usually greater during construction due to the exposed soil during grading and earth-moving operations, although such is expected to be minimal given the developed condition of the Project and the small size of the platforms to be constructed. Temporary soil disturbance during construction will be addressed by compliance with soil erosion and sedimentation control laws and implementing best management practices like hydrodynamic separators.

IX. Air Quality and Dust Control

Construction activities can result in short-term increases in fugitive dust and equipment-related particulate emissions in and around the Project. These potential air quality impacts will be short-term, occurring while demolition and construction work is in progress. The potential for fugitive dust emissions typically is associated with ground clearing, site preparation, grading, stockpiling of materials, on-site movement of equipment, transportation of construction equipment, and during high wind conditions. Dust control techniques that warrant consideration include minimizing track-out of soils onto nearby publicly-traveled roads, reducing speed on unpaved roads, covering haul vehicles, and applying dust suppressants or water to exposed surfaces, particularly those on which construction vehicles travel. Construction specifications will indicate when dust control is needed and the method of control to be used. Vegetation and mulching specifications will be provided in the design plans to minimize impacts during construction. A reference to these provisions will be a part of the Project's contract documents.