



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

Minnesota Division

March 5, 2020

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Margaret Anderson Kelliher
Commissioner of Transportation
Department of Transportation
MS 120, Transportation Building
St. Paul, Minnesota 55155

Re: Finding of No Significant Impact
Metro Transit Gold Line Bus Rapid Transit
From Downtown St. Paul to Woodbury
In Ramsey and Washington Counties, Minnesota

Dear Commissioner Margaret Anderson Kelliher:

Enclosed is a Finding of No Significant Impact (FONSI) as requested by Marni Karnowski's February 20, 2020, letter. The proposed project consists of constructing a 10-mile transit way paralleling I-94 that will connect Saint Paul with the suburban cities of Maplewood, Landfall, Oakdale, and Woodbury. An anticipated right-of-way agreement requiring Federal Highway Administration (FHWA) approval is the primary FHWA nexus to the proposed project.

This Finding concludes that the project will not significantly impact the human or natural environment.

A Notice of Availability of the FONSI must be sent to Federal, State, and local government agencies that are likely to have an interest in the undertaking; and to the State intergovernmental review contacts. It is encouraged that agencies which commented on the Environmental Assessment (or requested to be informed) are advised on the project decision, the disposition of their comments and proved a copy of the FONSI.

 PHILIP J FORST
2020.03.05
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FHWA

Philip Forst
Environmental Specialist

Enclosures

PJF

cc: 1 MnDOT – Moynihan – debra.moynihan@state.mn.us
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1 FHWA – Campbell – joe.w.campbell@dot.gov
1 FTA - Greep – Anthony.greep@dot.gov

**U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION
MINNESOTA DIVISION
FINDING OF NO SIGNIFICANT IMPACT**

Right of Way Use Agreement
For Metro Transit Gold Line Bus Rapid Transit
In the Cities of St. Paul, Maplewood, Landfall, Oakdale, and Woodbury
Ramsey and Washington Counties, Minnesota

Whereas, the proposed action is an element of an undertaking sponsored by the Metro Transit title 'Gold Line Bus Rapid Transit', for which the Federal Transit Administration (FTA), serving as the lead federal agency, has issued a Final Environmental Assessment (EA) on September 26, 2019, and later issued a Finding of No Significant Impact (FONSI) on January 17, 2020.

The FTA invited the Federal Highway Administration (FHWA) to participate as a Cooperating Agency in the development of an EA for the Gold Line Bus Rapid Transit Project. The FHWA agreed to be a Cooperating Agency. As permitted by 23 CFR 771.121 (c), the FHWA has reviewed the FTA's EA and subsequent FONSI with the intent of adopting select elements of the environmental review and issuing a separate decision document. This separate National Environmental Policy Act (NEPA) decision document is necessary for FHWA to take an approval action on a right-of-way (ROW) agreement which allows a portion of I-94 ROW to be used for construction and maintenance of the Gold Line Bus Rapid Transit.

The proposed FTA project would construct an approximate 10-mile dedicated transitway in Ramsey and Washington Counties that, generally, would parallel Interstate 94. The transitway requires the use of both privately-owned land and I-94 ROW. The primary FHWA nexus to the FTA project is that the use of I-94 ROW and airspace require FHWA approval of a ROW agreement. FHWA participation in the project development process led to a determination that an FHWA Interstate Access Request is not required for the current FTA preferred alternative.

After independent evaluation of (1) the need, environmental issues, impacts, and mitigation measures contained in the Final EA, (2) its review of substantive comments and responses, and (3) other agency determinations including the Minnesota Department of Transportation's (MnDOT) request to issue a FONSI on behalf of Metro Transit, the FHWA finds that:

The proposed FHWA action (the scope of the anticipated FHWA-approved ROW agreement) as described in the body of this FONSI and described in the FTA EA will not have significant impacts to the human or natural environment. Furthermore, the FTA documentation largely incorporated FHWA's comments as a Cooperating Agency and meets the analysis required for the FHWA environmental process.

The FHWA has sufficient evidence and analysis to determine that an Environmental Impact Statement is not required. The FHWA takes full responsibility for the accuracy,

scope, and content of the portions of the EA adopted for the proposed project. Mitigation associated with the impacts of proposed project as described in the FTA EA, the appendices to the FTA FONSI, this FONSI, and any subsequent permit actions needed for the project, will be delivered during final design and construction.

The FTA FONSI (Appendix C, Table C-1) makes a general commitment to maintain adequate minimums of horizontal and vertical clearance (aka ‘navigational window’) at the bridges crossing I-694 at 4th Street and crossing I-94 at Bielenberg Drive. Since the issuance of the FTA FONSI, the two navigational windows have been established. These navigation windows are relative to existing I-694 and I94 plan and profile. This FONSI (Appendix A) and the final FHWA-approved ROW agreement will include those defined navigational windows. The navigation windows are necessary to accommodate known and reasonably foreseeable projects at these locations that will ensure adequate operation of the Interstate for the traveling public and reliable freight operation on the primary east-west freight route through the Twin Cities. A minimum vertical clearance of 17’4” over existing I-94 profile at Bielenberg Drive will ensure a minimum 16’6” vertical clearance exists after the overlay project currently programmed in the 2023 STIP. The 17’4” comes from the required minimum vertical clearance of 16’6” plus an assumed 10” unbonded concrete overlay. If MnDOT elects to raise the existing I-94 profile at Bielenberg Drive (in addition to the depth the programmed overlay project will add) and/or have a thicker overlay, the Gold Line Project will need to accommodate any profile raise and overlay depth so a minimum vertical clearance of 16’6” remains after the overlay project. I-694 mainline at 4th Street already has an overlay in place at the time of this FONSI. Maintaining a minimum 16’6” vertical clearance over existing I-694 profile at 4th Street and the above required minimum vertical clearance at I-94/Bielenberg will ensure both areas continue adequate operation as regional and nationwide freight routes that include oversize/overweight vehicles. The navigation windows defined in Appendix A of this document are taken to be commitments necessary to be delivered during Gold Line design and construction. Failure to fulfill the commitments will result the FHWA undertaking (overlay on mainline I-94 currently programmed for 2023) and any mainline I-694 project that would include reconstruction/replacement/overlay) of the pavement in the 4th Street area being deemed ineligible for reimbursement with FHWA obligation authority.

Appendix A (“Navigational Window” Commitments on I-694 at 4th Street and I-94 at Bielenberg Drive) and Appendix B (the January 17, 2020, FTA FONSI and the February 20, 2020, MnDOT request letter) are hereby incorporated into this FONSI by reference.

FHWA hereby adopts the elements of the September 2019 FTA EA relevant to the execution of the anticipated FHWA-approved ROW agreement and the operation of the Interstate System.

This FONSI is subject to reevaluation if significant changes occur in the final design or if construction is delayed. Furthermore, the application of this FONSI is limited to the scope for

the work as outlined in MnDOT's February 20, 2020, letter requesting partial adoption of the Metropolitan Council and FTA EA. Any additional changes to the scope of the FHWA ROW agreement are subject to additional review and determinations in distinct National Environmental Policy Act processes.

 WILLIAM R LOHR
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FHWA -06'00'

William Lohr, P.E.
Field Operations Team Leader

March 5, 2020

Date

List of Appendices	
Appendix	Title
A	“Navigational Window” Commitments on I-694 at 4 th Street and I-94 at Bielenberg Drive
B	MnDOT Request for Adoption of Metropolitan Council and FTA Environmental Assessment of the Gold Line Bus Rapid Transit Project, As It Pertains to the Right-of-Way Use Agreement on I-94 and I694 (February 20, 2020)

Appendix A

“Navigational Window” Commitments on I-694 at 4th Street and I-94 at Bielenberg Drive

Appendix B

MnDOT Request for Adoption of Metropolitan Council and FTA Environmental Assessment of the Gold Line Bus Rapid Transit Project, As It Pertains to the Right-of-Way Use Agreement on I-94 and I694 (February 20, 2020)

February 20, 2020

Mr. Wendall Meyer
FHWA Division Administrator
380 Jackson Street
Galtier Plaza, Suite 500
St. Paul, MN 55101-4802

SUBJECT: Request for adoption of Metropolitan Council and FTA environmental assessment of the Gold Line Bus Rapid Transit project, as it pertains to the Right-of-Way for Use Agreement on I-94 and I-694

Dear Mr. Meyer:

The purpose of this letter is to request FHWA's adoption of the Federal Transit Administration's (FTA) and Metropolitan Council's environmental assessment of the Gold Line Bus Rapid Transit project, as it pertains to the Right-of-Way for Use Agreement on I-94 and I-694, and to request FHWA to issue a Finding of No Significant Impact (FONSI) for the Gold Line project.

Description of Gold Line Bus Rapid Transit Project

This project is a planned 9- to 10-mile transitway in Ramsey and Washington counties in the eastern part of the Twin Cities Metropolitan Area (see Figure 1). The Project generally would operate parallel to Interstate 94 (I-94) and would better connect downtown Saint Paul with the suburban cities of Maplewood, Landfall, Oakdale and Woodbury.

The Metropolitan Council advanced the design and environmental evaluation for the Locally Preferred Alternative (LPA) which is Alternative 1, and includes Alignments A1, B, C and D3. In 2018, following the 2016 adoption of the LPA, the Corridor Management Committee (CMC) requested a second Build Alternative for study that modified Alignment A of the LPA, and the FTA and Council agreed to its full evaluation in the EA/EAW. Both Alternatives are illustrated in Figure 2.2-1.

MnDOT is providing I-94 and I-694 Right-of-Way (ROW), through a ROW Use Agreement per 23 CFR 710-405 and 23 CFR 810. Figures 3 – 29 illustrates the area the Gold Line will use MnDOT ROW in Appendix A.

Project Schedule and Funding

The project's planned letting date is Spring of 2022. Construction will start in 2022 and be completed by 2024.

The EA/EAW was published October 7, 2019. The comment period ended November 6th, 2019. The Met Council and FTA is planning to complete the Environmental Decision Document in January of 2020.

Environmental review process for the Met Council Gold Line Bus Rapid Transit Project

FTA and Met Council used an Environmental Assessment (EA)/ Environmental Assessment Worksheet (EAW) to gather public and agency comments on the project. The EA was prepared to comply with both the National Environmental Policy Act (NEPA) and the Minnesota Environmental Policy Act (MEPA). Met Council's web-site for the EA can be found at: <https://www.metrotransit.org/gold-line-ea>

The *Metro Gold Line Bus Rapid Transit Project EA/EAW* for the Met Council's project was released for agency and public review and comment on October 7, 2019 with a Notice of Availability published in the EQB Monitor. Three open house meetings to answer questions about the EA/EAW were held on the dates and locations listed below:

- Tuesday, October 22, 2019 – East Side Learning Hub at Harding High School
- Wednesday, October 23, 2019 - Landfall Community Center
- Monday, October 28, 2012 – Gold Line Project Office - 121 7th Place East, Suite 102, Saint Paul

Agency and public comments received during the comment period from October 7th, 2019 to November 6th, 2019 were considered in the development of the FTA Environmental Decision Document.

The Finding of No Significant Impact was signed January 17, 2020. The document incorporates responses to public and agency comments on the Environmental Assessment, the Final Programmatic Agreement regarding compliance with Section 106 (historic properties), and the Section 4(f) finding regarding the use of properties protected under Section 4(f) (parks, trails and parks and recreation facilities). This document was provided to the public on the project website (<https://www.metrotransit.org/gold-line-ea>) or hard copy upon request.

Current Status of the ROW Use Agreement between FHWA/MnDOT/Met Council

Since April 2019, the Gold Line BRT Project Office (GPO) has been in discussions with FHWA and MnDOT on the process for FHWA to formally review and concur with the Gold Line BRT project as it relates to use of a portion of the I-94 ROW for transit purposes. Following is a timeline of relevant meetings and discussions that have occurred to date:

- April 15, 2019 – kickoff meeting was held with GPO, MnDOT Metro ROW, and FHWA to provide a project overview and discuss the FHWA approval process and ROW use agreement structure.
- May 7, 2019 – second meeting was held with GPO, MnDOT Central Office (CO) of Land Management, and FHWA to further discuss the agreement structure and whether it should be an agreement, lease, limited use permit, etc.
- June 24, 2019 – a third meeting was held with GPO, MnDOT CO Land Management, MnDOT's Chief Counsel's Office, and MnDOT Metro ROW to further discuss the type of agreement as well as key issues to include in the agreement, coordination with the Metropolitan Council and FHWA, and a timeline for completion.

- July 9, 2019 – fourth meeting was held with GPO and MnDOT Metro ROW to further discuss a process and responsibilities for developing a draft agreement that would then be shared with the Metropolitan Council and FHWA.
- September 24, 2019 – a letter was sent from GPO to FHWA updating the FHWA on the schedule for development of the ROW use agreement, noting that prior to FHWA’s concurrence with the ROW use agreement, a federal action in the form of a Finding of No Significant Impact (FONSI) is needed for environmental clearance of the Gold Line project by FHWA. For FHWA to initiate the federal action for the Gold Line project and subsequently complete review of and concurrence with the ROW use agreement, Metro Transit must make a formal request to FHWA to use a portion of I-94 for transit purposes. The letter served as Metro Transit’s formal request to use a portion of I-94 ROW for the Gold Line BRT project. FHWA recipients of this letter included Wendall Meyer, Phil Forst, and Joe Campbell, see Appendix B.

Summary of MnDOT Involvement and Engagement on the Gold Line Bus Rapid Transit (GBRT) Project 2018-2019

MnDOT and Met Council’s Gold Line team have had extensive coordination. MnDOT has two Metro District liaison staff dedicated to transit project development and coordination with the interdisciplinary units within Metro. The following bullets highlight the various processes and groups that have worked together on the Gold Line project over the past two years.

1. Issue Resolution Teams (IRT) and Design Advancement and Refinement Teams (DART). IRTs began in early 2018 to help resolve several specific issues and develop the scope of the project. IRTs transitioned to DARTs in early 2019 as the project transitioned from issue resolution to design advancement. There are separate teams for St. Paul, Maplewood, Oakdale/Landfall, Woodbury, Stormwater, and Ownership & Maintenance. MnDOT has representation on all of these teams. MnDOT participants primarily include personnel from East and North Area Management and Transit Advantages. In all, there have been 132 IRT and DART meeting in 2018 and 2019.
2. Technical Advisory Committee (TAC). The TAC generally meets on a monthly basis, with cancellations as warranted, and is comprised of city engineers and planners, county engineers, MnDOT, Metro Transit, Federal Highway Administration. The purpose of the TAC is to provide technical input, identify strategies to avoid, minimize, and mitigate impacts, and provide technical recommendations to the Corridor Management Committee. MnDOT is represented on TAC by Area Management and Transit Advantages personnel. There have been 13 TAC meetings in 2018-2019.
3. Project Management Team (PMT). The PMT meets weekly and discusses issues and project advancement. The PMT is made up of key GBRT leadership, counties, Metro Transit, and MnDOT. MnDOT is represented by the Gold Line Manager of Design and Construction (a MnDOT employee), and MnDOT’s Director of the Metro District Transit Section. There have been 85 PMT meetings in 2018-2019.

4. Strategic Management Team (SMT). The SMT generally meets monthly as needed. It reviews progress and advises on project decisions pertaining to critical path items. The SMT serves as strategic advisors to the PMT and project partners. The SMT is made up of senior staff from Ramsey and Washington Counties, the Metropolitan Council Director of Transportation Services, Metro Transit Manager of BRT Projects, and senior MnDOT staff. MnDOT representation has ranged from the Director of the Metro District Transit Section level to the District Engineer level. There have been 13 SMT meetings in 2018-2019.
5. Corridor Management Committee (CMC). The CMC meets monthly as required, and is comprised of mayors, city council members, county commissioners, Metropolitan Council Chair, business and community representatives, and Metro Transit and MnDOT senior staff. The purpose of the CMC is to advise the Metropolitan Council and Ramsey and Washington Counties on the design and construction of GBRT. MnDOT representation on CMC has been at the Area Manager or Deputy District Engineer level. There have been 12 CMC meetings in 2018-2019.
6. Stand alone meetings with function areas. There have been numerous standalone meetings between GPO and various MnDOT functional areas, including CO Bridge, CO Geometric Design, Metro Traffic, Metro RTMC, Metro Water Resources, Metro State Aid, and others.
7. Right of Way Preservation Meetings. In the summer of 2018, a series of six meetings were held with GPO staff and MnDOT representatives from Transit Advantages, Transit Section, Area Management, Maintenance, Traffic, Water Resources, Design, and CO Geometrics. This group was assembled to review and modify Gold Line concepts, concentrating on pinch points, to assure impacts to MnDOT are minimized.
8. MnDOT reviews of Environmental Assessment (EA). MnDOT has been identified as a Cooperating Agency by the Federal Transit Administration. As such, MnDOT has reviewed the draft EA as part of Cooperating Agency review in 2019, in addition to commenting during the formal 30-day public comment period.
9. Formal plan reviews. MnDOT provided formal comments on the 15% plan in February, 2019. MnDOT will also be given the opportunity to review and provide comments at the 30%, 60%, and 90% levels.
10. MnDOT Layouts. GPO staff worked with MnDOT to segment GBRT into 13 MnDOT layouts. The 13 layouts are either Level 1 or Level 2, and are being submitted, reviewed, and approved by the MnDOT Layout Advisory Committee. The Chair of the LAC was also a member of the Right of Way Preservation team that met in the summer of 2018, so in addition to his regular Chair duties for the LAC, he also cross checks the layouts with the findings from the Right of Way Preservation effort.
11. MnDOT staff embedded in Gold Line Project Office. Several MnDOT staff are embedded in the Gold Line Project Office (GPO) and, in addition to their Gold Line-specific responsibilities,

identify issues that may be important or impactful to MnDOT. Marc Briese works full-time in the GPO and serves in a leadership role as the Manager of Design and Construction. He is involved in discussions with Metro Transit leadership and other GBRT Project leadership and represents MnDOT perspectives and identifies MnDOT concerns. Ed Sanderson works roughly half time in GPO and serves, in addition to other duties, serves as a the MnDOT Liaison. He identifies issues that may be of interest to or impactful to MnDOT and works to resolve issues accordingly. Lee Williams and other MnDOT right of way staff work full- and part-time in GPO and work directly with the design team on setting up right of way needs, while adhering to state and federal acquisitions requirements.

MnDOT review of FTA/Met Council EA, pertaining to the Gold Line project and MnDOT ROW Use Agreement along I-94 and I-694

MnDOT Metro District and Office of Environmental Stewardship staff reviewed the Gold Line EA/EAW as it pertains to the proposed ROW Use Agreement. Table 1 below lists EA environmental issue sections pertaining to the areas for which MnDOT and FHWA will issue a ROW Use Agreement to share the ROW on I-94 and I-694.

There was one item of environmental review that did not meet the adequacy which is performed on FHWA projects. During the MnDOT wildlife ecologist's review of the EA documents provided, a consultation process deviation was identified for how MnDOT, on behalf of FHWA, reviews projects for impacts to the federally endangered rusty-patched bumble bee (*Bombus affinis*; RPBB). Specifically, the project will be impacting roadside vegetation within an area U.S. Fish and Wildlife Service (USFWS) identified as a High Potential Zone (HPZ). Recent research found that RPBB does use roadside habitat in the Twin Cities Metro, and will forage on non-native flowering species ([Evans et al. 2019](#)). MnDOT has also completed surveys for RPBB in roadside areas and documented their presence in areas of the Twin Cities and southeast Minnesota, including areas dominated by non-native and noxious weeds (MnDOT unpub. data). As a result of these findings, MnDOT typically makes a determination of *may affect, not likely to adversely affect* and seeks USFWS concurrence for the RPBB when disturbing areas of low to moderate quality vegetation beyond the inslope of the roadway (i.e., beyond the first ~ 15' of the roadway shoulder).

This was brought to the attention of the FTA. A consultation letter was sent to USFWS on 11/1/2019 to remedy the issue. This new information relative to the use of areas dominated by non-native and noxious weeds was unavailable to FTA at the time of the initial consultation with USFWS. As a result of the new information, FTA has made a revised determination of "may affect, not likely to adversely affect" for the RPBB, as the Project will be disturbing areas of low- to moderate-quality vegetation beyond the inslope of the roadway. FTA requested concurrence from the USFWS on this determination for the RPBB. USFWS concurrence letter is located in **Appendix E of the FTA FONSI**. Consultation with USFWS local field office will continue as design advances to further minimize and reduce the potential for conflict to RPBB during the active season. Mitigation for the RPBB is outlined in the Biological Environment of the **FTA FONSI Appendix C**. Field surveys will be coordinated with USFWS to further refine potential impacts to RPBB. The resulting concurrence and mitigation meets the adequacy of work that is performed on FHWA projects.

The EA discussion on Cumulative Impacts did not identify future implications to using MnDOT ROW and its effects of sharing drainage and limiting expansion of I-94 on the north side of the corridor within the current ROW. It was requested by MnDOT Water Resources staff that all drainage infrastructure for treatment and rate control of the Gold Line be outside of MnDOT ROW. Drainage traveling south onto MnDOT ROW will be cost sharing in the maintenance of MnDOT's existing drainage structures based on contributing volume. If water quality regulations change or expansion of I-94 is necessary there are cumulative impacts. Additional ROW would be necessary outside of the existing footprint of I-94 which would impact other land uses.

The Gold Line project has had extensive conversations with MnDOT regarding the proposed design. These conversations included but were not limited to Issue Resolution Teams (IRTs), Technical Advisory Committee (TAC) meetings, and MnDOT staff embedded within the Gold Line project team, as described above on pages 4 and 5. The purpose of these teams was to ensure critical design elements were addressed pertaining to safety and operations of the impacted MnDOT jurisdiction. Gold Line plans were carried out to 15% design and will require additional reviews and approvals in accordance MnDOT Highway Design standards in the 30%, 60%, 90% and 100% design reviews. These reviews center around safety of the proposed designs as well as conflicts with MnDOT investment priorities.

The I-694/I-494/I-94 system interchange is located between the 4th Street Bridge and the Bielenberg Bridge, illustrated on Figure 1 in **Appendix A**. The proposed I-94 ROW the Gold Line would share is illustrated on Figures 23 and 25, respectively in **Appendix A**. MnDOT has a current study underway to analyze the future needs of this interchange. Due to the close proximity of these proposed new bridges and potential limiting effects to the system interchange, MnDOT and FHWA has requested that the commitment to place bridge piers such that proposed improvements on I-94 would not be precluded under the 4th Street Bridge and the Bielenberg Drive Bridge be documented in the FTA FONSI. This commitment has been generally documented in the Traffic section of Table C-1 in **Appendix C of the FTA FONSI**. The navigational windows for accommodating I-94 both horizontally and vertically into the foreseeable future for the Gold Line new bridges have been established and will be part of the FHWA FONSI and the final ROW agreement. The agencies will continue to coordinate as the design advances through the Project Development and Engineering phases.

It is observed that the documentation of the ROW that the Gold Line will share with Mn/DOT and FHWA is not described or illustrated in the EA. The ROW Use Agreement is only listed in the Permits Table. The benefit of sharing this land, which is currently zoned and used as transportation, is not clarified. This reduces the need for the Gold Line Project to acquire residential, park or commercial property. In addition, the EA does not clarify how the ROW Use Agreement will potentially affect the future expansion on I-94. The public open house events did have poster boards clearly noting these items, see Figures 3-29 in **Appendix A**. The ROW proposed for use was illustrated on the project plan sheet layouts. The tradeoffs of using the ROW was also noted on a poster board. Those attending the open house events will have a better understanding of the ROW Use Agreement than is described in the EA.

The remaining environmental review for the Gold Line project has been found adequate by MnDOT staff. The following Table 1 provides a summary of the issue item as described in the EA with any necessary follow up items in the FONSI. The table states that it meets the level of documentation and or clearance that would be expected for a FHWA project.

Future FHWA Undertakings for Gold Line – Noise Analysis

The Gold Line project is not a Type I project under 23 CFR 772. This is a proposed transit-only project that meets the following criteria, and therefore is not considered a multimodal project for purposes of 23 CFR 772:

1) Lead Agency: The Federal Transit Administration (FTA) is the lead agency in the National Environmental Policy Act (NEPA) process and FHWA is not a co-lead. The FHWA's limited participation is as a cooperating agency.

2) Project Purpose: The main transportation purpose of the Project, as stated in the purpose and need statement of the NEPA document, is transit-related and not highway-related.

3) Funding: No Federal-aid highway funds are being used to fund the project.

This Project is not required to follow the noise regulations related to 23 CFR 772 as long as the project continues to meet the three criteria listed above. Specifically, portions of the Project may not be broken out or added to the project that would use FHWA funding or trigger an FHWA undertaking.

Table 1- EA Review of and summary of MnDOT review

Environmental Issue	Location in EA (Section - page #)	Reviewer	Summary of impacts:
Purpose and Need	1.0	All	<p>Purpose and Need Informational item. Need based on ridership of area bus service, the current inability to provide service to existing population and future growing population. Adequate information provided to justify the need.</p>
Alternatives	2.0	Jon Solberg Ryan Coddington Sheila Kauppi	<p>Alternatives Evaluated several alternatives. Table 2.1-1 illustrates the development process from Corridor Study to selection of the Preferred Alternative. Alternative 1 discussed on page 2-6 is the locally preferred alternative.</p> <p>Adequate information to describe the process and proposed alternatives.</p> <p>The Preferred Alternative does not describe how it proposes to use MnDOT ROW through a Use Agreement, which is a large portion of the proposed alternative’s location. The only identification of this is in the Permit Table, stated as Right-of-Way Permit with MnDOT</p> <p>The open house will remedy the clarification necessary on this item.</p>

Environmental Issue	Location in EA (Section - page #)	Reviewer	Summary of impacts:
Right-of-Way	3.4.2	Ben Klismith	Right-of-Way The EA provided a summary of acquisitions outside of MnDOT ROW. The Preferred Alternative will have 35 partial parcel acquisitions and 2 full parcel acquisitions. The Council would acquire property and relocate all eligible businesses in accordance with the Uniform Relocation Act and Minnesota Statutes Chapter 117. Adequate information for ROW discussion.

Environmental Issue	Location in EA (Section - page #)	Reviewer	Summary of impacts:
Historical/ Archaeological Impact	3.4.3	Kristen Zschomler	<p>Historical/Archaeological Impact</p> <p>FTA designated the MnDOT Cultural Resources Unit (CRU) to work directly with MnSHPO on FTA’s behalf, with FTA remaining responsible for designating consulting parties and making all findings and determinations pursuant to 36 CFR Part 800⁻¹. FHWA designated FTA as the lead agency for Section 106 for this project.</p> <p>The FTA, Council, MnDOT CRU and the MnSHPO consulted with other consulting parties to prepare a Section 106 Programmatic Agreement (PA) for the Project. FTA requested input from the public on the draft PA through the EA public comment process. The FONSI in Appendix C of this document includes the signed PA in Appendix B of the FONSI. The PA establishes roles and responsibilities for implementation and includes processes for identifying and evaluating properties for the NRHP, assessing effects on historic properties, and resolving any adverse effects. The PA also spells out design development and review processes and requirements for protecting historic properties during Project construction. The FTA, Council and MnSHPO has executed the PA since completion of the public comment period on the EA and has included this in FTA’s environmental decision document for the Project. FTA, with assistance from MnDOT CRU, will then assess effects of the Project on historic properties that are listed in or are eligible for inclusion in the NRHP and implement the remaining terms of the executed PA.</p> <p>The FTA and MnDOT CRU identified to date a total of 29 properties within the Project’s architecture/history and archaeological APEs. All identified sites are architecture/history properties. No NRHP-listed or -eligible archaeological properties have been identified within the Project’s archaeological APE. The 29 architecture/history properties identified within the Project’s APE include four historic districts, 19 properties that are individually eligible for or listed in the NRHP, and six properties that are both individually listed or eligible for the NRHP and listed or eligible as a contributing element to a historic district.² Per the terms of the executed PA, the FTA and MnDOT CRU will continue to conduct surveys to identify architecture/history properties in areas added to the architecture/history APE, as well as in previously surveyed areas that will be 50 years of age or older at the initiation of Project construction, that may be affected by the Project.</p> <p>Continued on next page</p>

Environmental Issue	Location in EA (Section - page #)	Reviewer	Summary of impacts:
Continued Historical/ Archaeological Impact	3.4.3	Kristen Zschomler	<p>Per the terms of the executed PA, the Project will also continue to survey the areas added to the archaeological APE to identify potential archaeological sites that may be affected by the Project. If FTA determines the Project would have an adverse effect on a historic property, FTA will consult with MnSHPO and other consulting parties per the terms of the executed PA to consider avoidance, minimization and/or mitigation measures to resolve the adverse effect.</p> <p>The FTA and MnDOT CRU have not identified any historic properties in the Project's architecture/history and archaeological APEs that the Hazel Street Station Option or the Dedicated Guideway Option at Hadley Avenue and 4th Street would affect. As the executed PA is implemented, if these options would affect an identified historic property, FTA will consult with MnSHPO and other Section 106 consulting parties per the terms of the executed PA to consider the effects and avoidance, minimization and/or mitigation measures to resolve adverse effects.</p> <p>FTA followed the terms of any active MN FHWA/consulting party Section 106 agreements (e.g. tribal) applicable to this undertaking.</p> <p>Adequate information for the Section 106 PA process, potential impacts and mitigation.</p>

¹ "Participants in the Section 106 Process", Title 36, CFR, Sec. 800.2. 2004. Available at: https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=0729a2beb9368a20c60d354433ceb95e&mc=true&n=pt36.3.800&r=PART&ty=HTML#se36.3.800_12. Accessed March 2019.

² The 19 properties identified as individually eligible for or listed in the NRHP includes four properties being treated as eligible for the NRHP for the purposed of completing the Section 106 process for the Project.

Environmental Issue	Location in EA (Section - page #)	Reviewer	Summary of impacts:
Environmental Justice	3.4.6 pages: 3-25	Lisa Elliott	<p>Environmental Justice</p> <p>This section summarized the Project’s anticipated long-term and short-term impacts to environmental justice populations within the Project area in compliance with federal requirements. No short-term or long-term anticipated disproportionately high or adverse effects to environmental justice populations for the Preferred Alternative. The analysis provided Table 3.4.4 illustrating the percentage of minority communities is higher than the study area compared to Ramsey County, Washington County, City of Maplewood, City of Land fall, City of Oakdale, and City of Woodbury. These results were not discussed in the text or in the FONSI. The resulting mitigation addressing construction impacts for the project is as follows:</p> <ul style="list-style-type: none"> • Signage directing business patrons to streets where parking is available • Ongoing and transparent outreach program to inform business owners and residents of construction activities • Implement construction staging to minimize short-term impacts • See Section 3.6.1.8 (“Visual Quality and Aesthetics”) for mitigation measures • See Section 3.6.1.15 (“Noise and Vibration”) for mitigation measures <p>Adequate information for Environmental Justice analysis, review process and proposed mitigation.</p>
Floodplains	3.5.2.1 pages 3-36 thru 3-41	Nick Tiedeken	<p>Floodplains</p> <p>The Build Alternative 1 is anticipated to impact floodplains with a minimum of 4,842 cubic yards of fill, and potential additional fill at BC-25X and BC-25. Mitigation will be provided for the fill and permitted through the appropriate regulatory agency (see Section 3.9). The Project Proposer will further evaluate measures to minimize these impacts as the Project design advances during the Project Development and Engineering phases. The Project proposer does not anticipate impacts to floodways, based on current data. (Noted on page 3-39)</p> <p>Mitigation:</p> <ul style="list-style-type: none"> • Replacement storage required for impacts at Alignments C and D3 • Coordinate mitigation requirements during Engineering Phase with Ramsey Washington Metro Watershed District through permitting processes • Review model and compensatory storage for each area to avoid a net increase in impacts and/or the potential for flooding outside of the Project area

Environmental Issue	Location in EA (Section - page #)	Reviewer	Summary of impacts:
			<p>MnDOT typically fills out a Floodplain Assessment form that will ensure meeting Executive Order 11988 Floodplain Management and Minnesota Statute 103F.101 – 103F.155. Based on the analysis performed in the EA, location of the floodplain impact and required permits with the regulatory agencies this impact analysis is adequate.</p>
<p>Surface Waters – Wetlands</p>	<p>3.5.2.2 pages 3-42 thru 3-46</p>	<p>Nick Tiedeken Katie Heinz</p>	<p>Surface Waters – Wetlands The EA states that Build Alternative 1 is anticipated to impact a total of 2.652 acres of surface waters. Possible measures to avoid or minimize these impacts will be evaluated as the Project design advances during the Project Development and Engineering phases. Mitigation:</p> <ul style="list-style-type: none"> • Project-related impacts to surface waters avoided and minimized to the extent possible • Engineering Phase will incorporate, where feasible, additional avoidance and minimization measures, which could include constructing steeper inslopes, broken backslopes, and treating stormwater prior to discharge • Stormwater ponds are proposed in upland areas, if feasible • Mitigation through the purchase of credits from state-managed wetland bank, rather than pursue on-site replacement of surface waters due to limited available space conducive to creating surface water • Potential wetland replacement based on current rules and regulations and 2.602 acres of impact would be: <ul style="list-style-type: none"> ▸ 5.20 acres replaced (minimum 2:1 ratio) ▸ 6.50 acres replaced (potential 2.5:1 ratio) <p>The Permit Table 4.3-1 identifies the following permits:</p> <ul style="list-style-type: none"> • Section 404 Wetland Permit – USACE • Public Waters Permit – DNR • Joint Application Form for Activities Affecting Water Resources in Minnesota – MN BWSR • Application for Drainage Permit - MnDOT • Section 401 Water Quality Certification - MPCA • Wetland Conservation Act Wetland Replacement Plan Approval – Cities of Saint Paul, Maplewood and Woodbury, Washington Conservation District, and CRWD and RWMWD <p>Adequate information has been provided for the identification, mitigation and permitting for Surface Waters – Wetlands.</p>

Environmental Issue	Location in EA (Section - page #)	Reviewer	Summary of impacts:
Stormwater and Water Quality	3.5.2.3 pages 3-47 thru 3-48	Bryce Fossand	<p>Stormwater and Water Quality Summary of Impacts:</p> <ul style="list-style-type: none"> • New and reconstructed impervious area: • 73 acres under baseline • 78 acres under Dedicated Guideway Option at Hadley Avenue and 4th Street • Disturbed soils combined with Project area runoff could potentially erode soil surfaces and drainageways, form gullies and deposit sediment in adjacent waterbodies • Without temporary BMPs (required through permitting process), these activities could destabilize slopes and affect water quality <p>Long Term Mitigation Measures:</p> <ul style="list-style-type: none"> • Based on Capitol Region and Ramsey-Washington Metro watershed districts' rules mitigation measures are required for all Project-related new and reconstructed impervious surfaces • Primary and secondary sites to demonstrate the Project's ability to meet regulatory requirements will be carried forward • Complete more hydrologic modeling of current and proposed conditions to more accurately assess if additional rate-control measures required • Use BMPs to remove total suspended solids (TSS) • Implement additional stormwater pollution control devices as needed to meet the watershed districts' requirements for TSS removal and pretreatment for filtration/infiltration systems • Erosion-control measures, dewatering and establishment of final surfaces, activities would be designed to meet the various agencies' requirements and would be included in construction documents • Special consideration given to regionally significant ecological areas <p>Short Term Mitigation Measures:</p> <ul style="list-style-type: none"> • Apply temporary BMPs (required through the permitting process), to prevent construction activities from destabilizing slopes and adversely affecting water quality • Locate temporary retaining walls or soil berms in small, isolated area to minimize wetland fill <p>Permits noted above in the Wetland Section. Adequate information has been provided for the identification, mitigation and permitting for Stormwater and Water Quality.</p>

Environmental Issue	Location in EA (Section - page #)	Reviewer	Summary of impacts:
Hazardous Materials, Pollution Prevention and Solid Waste	3.5.3 pages 5-38 thru 5-43	Jim Deluca	<p>Hazardous Materials</p> <p>A Phase I Environmental Site Assessment (ESA) was completed for the Project in 2018 and a Phase II ESA in 2019. For Build Alternative 1, the Phase I ESA identified a total of 111 sites within the Project's potential limits of disturbance that have risk for contamination: 45 high-risk sites; 46 medium-risk sites and 20 low-risk sites.</p> <p><u>Mitigation:</u></p> <ul style="list-style-type: none"> • Enroll in the MPCA Brownfield Program • Obtain approvals for any contamination management and clean-up plans • Land acquired that contains hazardous or regulated material, removal or clean-up will be addressed as outlined in the Response Action Plan (RAP) or Construction Contingency Plan (CCP) that will be developed for the Project prior to construction. • Develop RAP to mitigate contamination • Develop CCP as part of RAP to manage discovery of previously unknown contamination during construction • Develop spill prevention, control and countermeasure plan to address proper handling, treating, storing and disposing of solid wastes, petroleum products, and other regulated materials/wastes construction uses or generates • Assess site for asbestos-containing materials, lead-based paint, other regulated materials/wastes before demolition of structures <p>Adequate information has been provided for the identification, mitigation and permitting for Hazardous Materials, Pollution Prevention and Solid Waste</p>

Environmental Issue	Location in EA (Section - page #)	Reviewer	Summary of impacts:
Biological Environment (Federal State Listed T&E Species Endangered Species and Wildlife Habitat)	3.5.4 pages 3-50 thru 3-52	Chris Smith	<p>Biological Environment (Federal Endangered Species and Wildlife Habitat)</p> <p>The EA evaluates potential Project-related impacts to the northern long-eared bat (NLEB) and the rusty patched bumble bee (RPBB). The Project scope would not produce impacts to the Mississippi River or its tributaries; therefore, the resource analysis excludes the four mussel species.</p> <ul style="list-style-type: none"> • NLEB: The Project’s bridge work and tree removal <i>may effect but is not likely to adversely affect</i> the northern long-eared bat; however, the Project falls within the scope and will adhere to the criteria of the Programmatic Biological Opinion for Transportation Projects, which requires consultation with USFWS. • RPBB: Project will impact roadside vegetation within an area USFWS has identified as a High Potential Zone <i>may affect, not likely to adversely affect</i> <p>The Section 7 concurrence verification letters sent to USFWS is adequate for the northern long-eared bat and the rusty-patched bumble bee. Avoidance and minimization measures identified by IPaC during consultation are consistent with the consultation practices of MnDOT on behalf of FHWA.</p>

Environmental Issue	Location in EA (Section - page #)	Reviewer	Summary of impacts:
State Listed T&E Species	3.5.4 page 3.51	Peter Leete	<p>The Project could have the potential to produce impacts to the following three state-listed species; however, based on the analysis results, the Project proposer does not anticipate the Project would impact them. Due to the resource study area's urbanized location, and its low-quality, primarily roadway-adjacent terrestrial and wildlife habitat, it is not anticipated Build Alternative 1 would produce long-term impacts to threatened or endangered species. See separate pdf for attached DNR correspondence.</p> <ul style="list-style-type: none"> • Kitten-tails: No observation records place the species within the potential area of disturbance; therefore, Project-related impacts to the population of kitten-tails are not anticipated. • Peregrine falcon: Several observation records place the species in the Mississippi River corridor, nesting on buildings and structures around Saint Paul; however, after further reviewing the resource study area and preferred nesting areas for peregrine falcons, Project-related impacts to the species are not anticipated. • Blanding's turtle: No observation records place the species within the potential area of disturbance; therefore, Project-related impacts to the population of Blanding's turtles are not anticipated. <p><u>Mitigation:</u></p> <p>Wildlife habitat</p> <ul style="list-style-type: none"> › Implement DNR-established standard construction BMPs, as needed, to protect Blanding's turtles › BMPs would be used to lessen impacts to terrestrial and aquatic habitats › Stabilize areas disturbed by construction with interim and final erosion- and sediment-control measures that include seeding plans to inhibit spread of invasive species or noxious weeds <p>Peter commented that native seed species should be used for any turf reestablishment. This has been identified in the FONSI noted above in the summary.</p> <p>Adequate information has been provided for the identification and mitigation for State listed Threatened and Endangered Species.</p>

Environmental Issue	Location in EA (Section - page #)	Reviewer	Summary of impacts:
Noise	3.6.1.14 Pages 3.56	Natalie Ries	<p>Construction Phase Noise and Vibration</p> <p>Potential for temporary construction-related noise or vibration impacts.</p> <p><u>Mitigation</u></p> <ul style="list-style-type: none"> • Meet requirements of local noise ordinances • Prepare detailed noise and vibration control plan to mitigate short-term construction noise and vibration. Key elements include: <ul style="list-style-type: none"> › Contractor's specific equipment types › Schedule and methods of construction › Maximum noise and vibration limits for each piece of equipment with certification testing › Prohibitions on certain types of equipment and processes during the nighttime hours without variances › Identification of specific sensitive sites near construction sites › Methods for projecting construction noise and vibration levels › Implementation of noise and vibration control measures where appropriate › Acoustic shielding requirements for jackhammers, chainsaws and pavement breakers › Methods for responding to community complaints <p>The Federal Transit Administration (FTA) is the lead agency for this project and the Gold Line EA has assessed noise in accordance with guidelines specified in the FTA's Transit Noise and Vibration Impact Assessment guidance manual. This analysis is provided in Appendix A, Technical Report 5 of the EA.</p> <p>The Project will impact MnDOT's existing noise barriers (walls and berms) at 10 locations along the proposed project corridor. The existing noise mitigation measures that are being impacted by the Project must be replaced in-kind so that the noise reduction they are providing remains the same. In order to demonstrate that the existing MnDOT noise mitigation is being replaced in-kind, a noise assessment using FHWA's Traffic Noise Model (TNM) was completed as part of the Gold Line EA. The results of this analysis indicate that the relocated noise barriers can be designed to the same effectiveness as the existing barriers. This analysis is provided in Appendix A, Technical Report 5, Attachment A-5-3 of the EA.</p>

Environmental Issue	Location in EA (Section - page #)	Reviewer	Summary of impacts:
Noise Continued		Natalie Ries	<p>The Gold Line project is not a Type I project under 23 CFR 772. This is a proposed transit-only project that meets the following criteria, and therefore is not considered a multimodal project for purposes of 23 CFR 772:</p> <p>1) Lead Agency: The Federal Transit Administration (FTA) is the lead agency in the National Environmental Policy Act (NEPA) process and FHWA is not a co-lead. The FHWA's limited participation is as a cooperating agency.</p> <p>2) Project Purpose: The main transportation purpose of the Project, as stated in the purpose and need statement of the NEPA document, is transit-related and not highway-related.</p> <p>3) Funding: No Federal-aid highway funds are being used to fund the project.</p> <p>This Project is not required to follow the noise regulations related to 23 CFR 772 as long as the project continues to meet the three criteria listed above. Specifically, portions of the Project may not be broken out or added to the project that would use FHWA funding or trigger an FHWA undertaking.</p>
(Air Quality) CO Intersection Dispersion Results	Appendix A – Tech Report 5	Natalie Ries	The EA does not have a separate Air Quality section but does address air quality in the Cumulative Impacts section 3.7. The Tech Report was reviewed and it adequate for identifying impacts and mitigation.

Environmental Issue	Location in EA (Section - page #)	Reviewer	Summary of impacts:
Section 4(f) Resources	3.8 pages 3-64 thru 3-77	Deb Moynihan	<p>Section 4(f) Resources</p> <p>Of these 16 public parks or recreation resources identified in the study area, the Project impacts one parkway and surrounding park space (Johnson Parkway), one park (Menomini Park) and one multi-use trail on Bielenberg Drive. For the remaining 13 resources, it is determined that there would not be a permanent use, temporary occupancy or constructive use of these Section 4(f) resources. The Project proposer coordinated with local agencies (formally termed Officials with Jurisdiction, or OWJs) to review impacts to the parks and recreation areas and to obtain input on the preliminary determinations of Section 4(f) use with de minimis impacts. Final letters from the OWJ will come after the EA comment period. In total there are three separate de minimis determinations, see determinations noted at the end of impacted park discussion.</p> <p><u>Summary of Impacts:</u></p> <ul style="list-style-type: none"> ▸ Johnson Parkway – minor amount of permanent and temporary easements for guideway, sidewalks, storm sewer pipe and access for routine stormwater facility maintenance ▸ Menomini Park – stormwater facility and access road ▸ Multi-use trail in Woodbury- minor alignment shift within public right of way ▸ Temporary closure of Johnson Parkway and regional trail (approximately 90 days) ▸ Temporary closure of Menomini Park trail; construction of access road (one construction season) ▸ Temporary closure of multi-use trail in Woodbury (one construction season) <p><u>Mitigation:</u></p> <ul style="list-style-type: none"> • Grade slopes to match into the existing landform at Johnson Parkway • Restore landscaping in disturbed park space to preconstruction condition • Restore trails to preconstruction condition • Reseed new pond within Menomini Park • Detour Menomini Park trail and Johnson Parkway regional trail to local streets • Notify public about closures and detours in advance • Minimize construction duration

Environmental Issue	Location in EA (Section - page #)	Reviewer	Summary of impacts:
Section 4(f) Resources Continued	3.8 pages 3-64 thru 3-77	Deb Moynihan	<p>The Gaps analysis concentrated on the two Section 4(f) resources bordering I-94 (Johnson Parkway and Menomini Park). Both of these Section 4(f) resources were determined to have de minimis impacts. The EA identifies the Section 4(f) property features, attributes, and activities in consultation with the Official with Jurisdiction. The EA demonstrates that the proposed project, after accounting for avoidance, minimization, and mitigation, would not adversely impact the activities, features, and attributes that qualify the property for Section 4(f) protections. The EA provides a description of the preliminary de minimis determination with concurrence of the OWJ.</p> <p>The FONSI provides letters of concurrence from the City of St. Paul and the City of Woodbury, see Appendix D of the FONSI.</p> <p>The only possible setback for the project would be if impacts to Johnson Parkway (which is part of the Grand Rounds) ends up with an adverse effect finding by SHPO, which would trigger Section 4(f) on the historical side. The document appropriately discusses that as a possibility.</p> <p>The EA is adequate in identifying the Section 4f process, impacts and proposed mitigation.</p>
Indirect Effects	3.7 page 3-58	Deb Moynihan	<p>Indirect Effects</p> <p>The EA focused on the community, natural environment and increased traffic and parking demand. It identified that new development near stations has potential to impact the built and natural environment; displace residents due to rising property values; increase traffic congestion and parking demand.</p> <p>The EA does not identify that as a result of use of I-94 right of way, future expansions of the interstate will be limited to the south side. However, this was identified at the Open House events. The combination of the EA and Open House provides for adequate identification of Indirect Effects.</p>

Environmental Issue	Location in EA (Section - page #)	Reviewer	Summary of impacts:
Cumulative Impacts	3.9 page 3-61	Deb Moynihan	<p>Cumulative Impacts</p> <p>Cumulative impacts</p> <ul style="list-style-type: none"> ▪ Potential impacts to transportation system, land use and natural environmental <p>Long Term Mitigation</p> <ul style="list-style-type: none"> • Local, state and federal regulations are in place to minimize potential cumulative effects • Mitigation for direct impacts will further minimize the potential for cumulative impacts <p>Cumulative effects are lacking in terms of future expansion for I-94. Any future expansion of the roadway or necessary from reasonably foreseeable future actions appears to be adequate for considering impacts to the I-94 right of way.</p>
Public and Agency Involvement	4.0 starting on page 4-1	Jon Solberg Adam Josephson Sheila Kauppi Deb Moynihan	<p>Public Engagement</p> <p>Public engagement focused on building understanding of the Project and providing opportunities for involvement. Key messages helped build public awareness of the Project's purpose and need (see Chapter 1. Purpose and Need). Engagement with environmental justice communities was also a focus for engagement activities. Project meeting locations, formats and materials have involved environmental justice communities in the Project area (see the Community and Social Resources Technical Report for additional information). Examples of efforts to engage environmental justice communities include:</p> <ul style="list-style-type: none"> • Project fact sheets translated in Hmong, Karen, Somali and Spanish languages

Environmental Issue	Location in EA (Section - page #)	Reviewer	Summary of impacts:
Public and Agency Involvement Continued	4.0 starting on page 4-1	Jon Solberg Adam Josephson Sheila Kauppi Deb Moynihan	<ul style="list-style-type: none"> • Members of environmental justice communities served on the Community Advisory Committee and continue to serve on the CBAC and have become knowledgeable and invested stakeholders in the Project • Meetings held in neighborhoods to discuss design advancement that resulted in: <ul style="list-style-type: none"> ▸ A new traffic signal proposed at the intersection of the I-94 westbound ramp and Mounds Boulevard to provide a pedestrian crossing and improve pedestrian safety ▸ Changes to the street, guideway, and station design avoid loss of on-street parking spaces ▸ Project design adjustments made east of Conway Street and west of Etna Street in Saint Paul to avoid acquisition of apartment buildings that would have displaced hundreds of residents, including minority residents and residents with Section 8 vouchers ▸ New pedestrian connections included to the TH 61 interchange with I-94 ▸ Change to operate BRT in mixed traffic along Hudson Boulevard in Landfall <p>The Project Proposer conducted the three neighborhood meetings among residents in the following areas, which all include environmental justice populations, where additional input would be valuable in the advancement of the Project design:</p> <ul style="list-style-type: none"> • Mounds Boulevard and Maria Avenue residents, focusing on a station located at Mounds Boulevard or Maria Avenue • Hudson Road residents, focusing on BRT in a dedicated guideway or in mixed traffic

Environmental Issue	Location in EA (Section - page #)	Reviewer	Summary of impacts:
			<ul style="list-style-type: none"> White Bear Avenue and Ruth Street residents, focusing on a station located at Hazel Street or Van Dyke Street <p>Project staff also conducted door-knocking activities in two Saint Paul neighborhoods in which the Project was considering options for station locations at either Mounds Boulevard or Maria Avenue, and at either Van Dyke Street or Hazel Street. These efforts notified residents of upcoming neighborhood meetings, and Project staff gathered input from those unable to attend the meetings about their preferences for the station options.</p> <p>The Project proposer provided adequate public and agency involvement for the selection of a preferred alternative to publishing the EA.</p>

Permits

The table below lists permits needed for the project.

Permit/Approval	Jurisdiction(s)
Federal Approvals	
Environmental Decision Document	FTA, FHWA
Section 4(f) Determination	FTA, Department of Interior as applicable
Section 106 PA	FTA, Advisory Council on Historic Preservation
Right-of-Way Use Agreement	FHWA
Section 404 Wetland Permit	USACE
Endangered Species Act, Section 7 Determination	USFWS
Minnesota State Approvals	
Public Waters Work Permit	DNR
Water Appropriation Permit	DNR
Joint Application Form for Activities Affecting Water Resources in Minnesota	Minnesota Board of Water and Soil Resources
Section 106 PA	MnSHPO
Right-of-Way Permit	MnDOT
Application for Drainage Permit	MnDOT
Application for Utility Accommodation	MnDOT

Permit/Approval	Jurisdiction(s)
on Trunk Highway Right-of-Way	
Application for Miscellaneous Work on Trunk Highway Right-of-Way	MnDOT
National Pollutant Discharge Elimination System Permit	MPCA
Section 401 Water Quality Certification	MPCA
Noxious Weed Management Plan	Minnesota Department of Agriculture
Local Approvals	
Environmental Decision Document for State-Required Environmental Process	Council
Road Crossing/Right-of-Way Permits	Washington and Ramsey counties, and Cities of Saint Paul, Maplewood, Landfall, Oakdale and Woodbury
Building Permits	Cities of Saint Paul, Maplewood, Landfall, Oakdale and Woodbury
Erosion/Sediment Control/Grading Permits	Cities of Saint Paul, Maplewood, Oakdale and Woodbury, and CRWD, RWMWD and South Washington Watershed District
Wetland Conservation Act Wetland Replacement Plan Approval	Cities of Saint Paul, Maplewood and Woodbury, Washington Conservation District, and CRWD and RWMWD

Conclusion

MnDOT requests FHWA's adoption of the FTA and Met Council's environmental assessment of the Gold Line Bus Rapid Transit project, as it pertains to the Right-of-Way for Use Agreement on I-94 and I-694, and to request FHWA to issue a Finding of No Significant Impact (FONSI) for the Gold Line project.

Documents submitted in support of the FONSI are listed below:

- Signed FTA FONSI (attached)
- Final Met Council and FTA Gold Line EA (Electronic copy only - reference link: EDMS Doc number 7499636)
- Public hearing transcript (FONSI Appendix A - Electronic copy only - reference link: EDMS Doc number 7500045)
- Final Programmatic Agreement (FONSI Appendix B - Electronic copy only - reference link: EDMS Doc number 7500045)
- Mitigation Commitments (FONSI Appendix C - Electronic copy only - reference link: EDMS Doc number 7500045)
- Section 4(f) Concurrence Letter (FONSI Appendix D - Electronic copy only - reference link: EDMS Doc number 7500045)
- U.S. Fish and Wild Life Service Concurrence Letter (FONSI Appendix E - Electronic copy only - reference link: EDMS Doc number 7500045)
- Final Findings of Facts and Conclusions from the Met Council (FONSI Appendix F - Electronic copy only - reference link: EDMS Doc number 7500045))
- Ad and affidavit for the public hearing and EA (EA Appendix F - Electronic copy only - reference link: EDMS Doc number 7500045))

Sincerely,



Marni Karnowski
Chief Environmental Officer
Director, Office of Environmental Stewardship

2/20/2020
Date

Cc:

Jon Solberg – MnDOT Metro Planning, Program Management and Transit Director
Deb Moynihan – CO Office of Environmental Stewardship
Dale Gade – MnDOT Metro Project Controls

APPENDIX A – FIGURES



FIGURE 1.1-1: METRO GOLD LINE BUS RAPID TRANSIT PROJECT

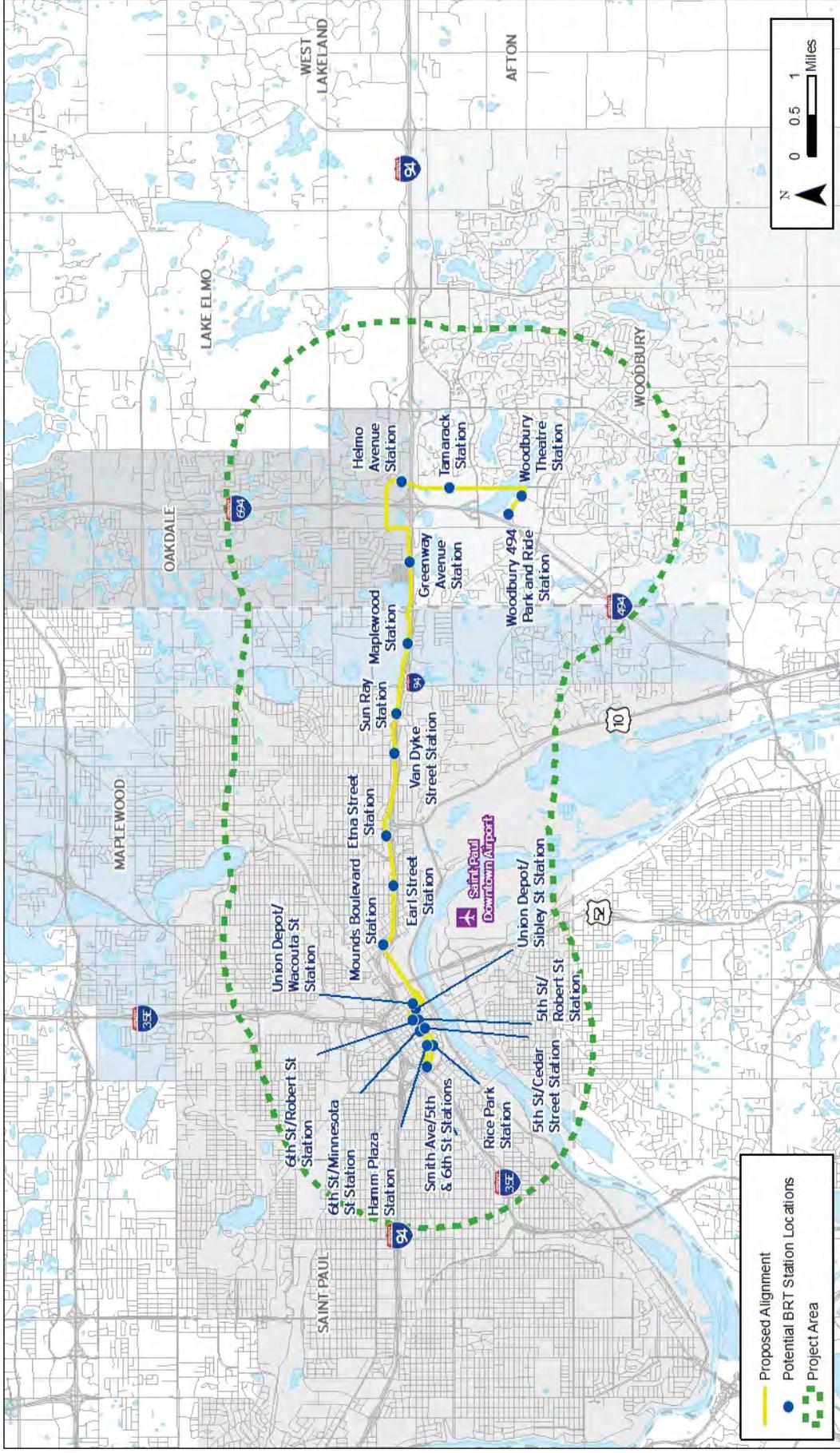




FIGURE 2.2-1: PROJECT BUILD ALTERNATIVES EVALUATED IN THE ENVIRONMENTAL ASSESSMENT

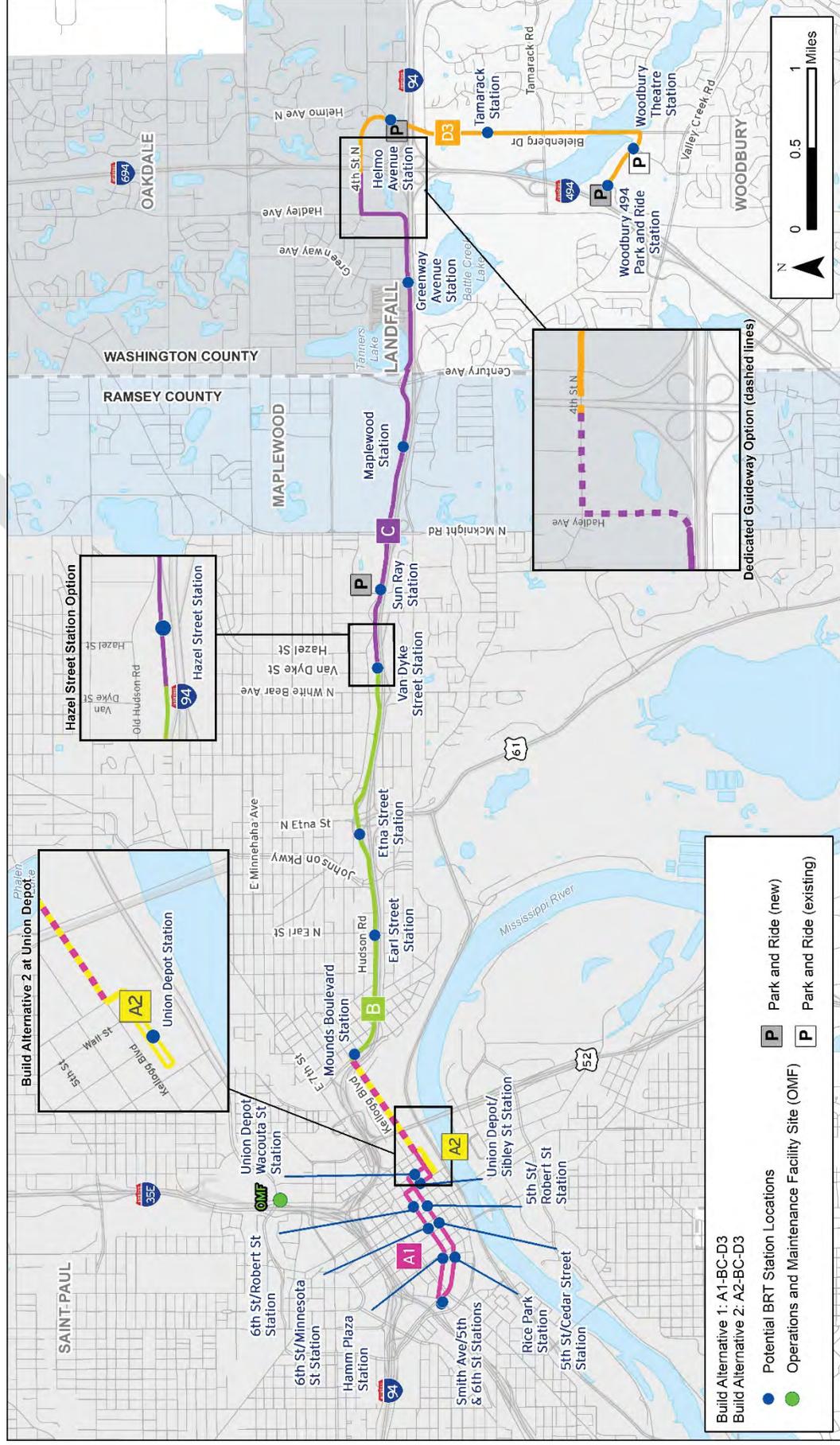
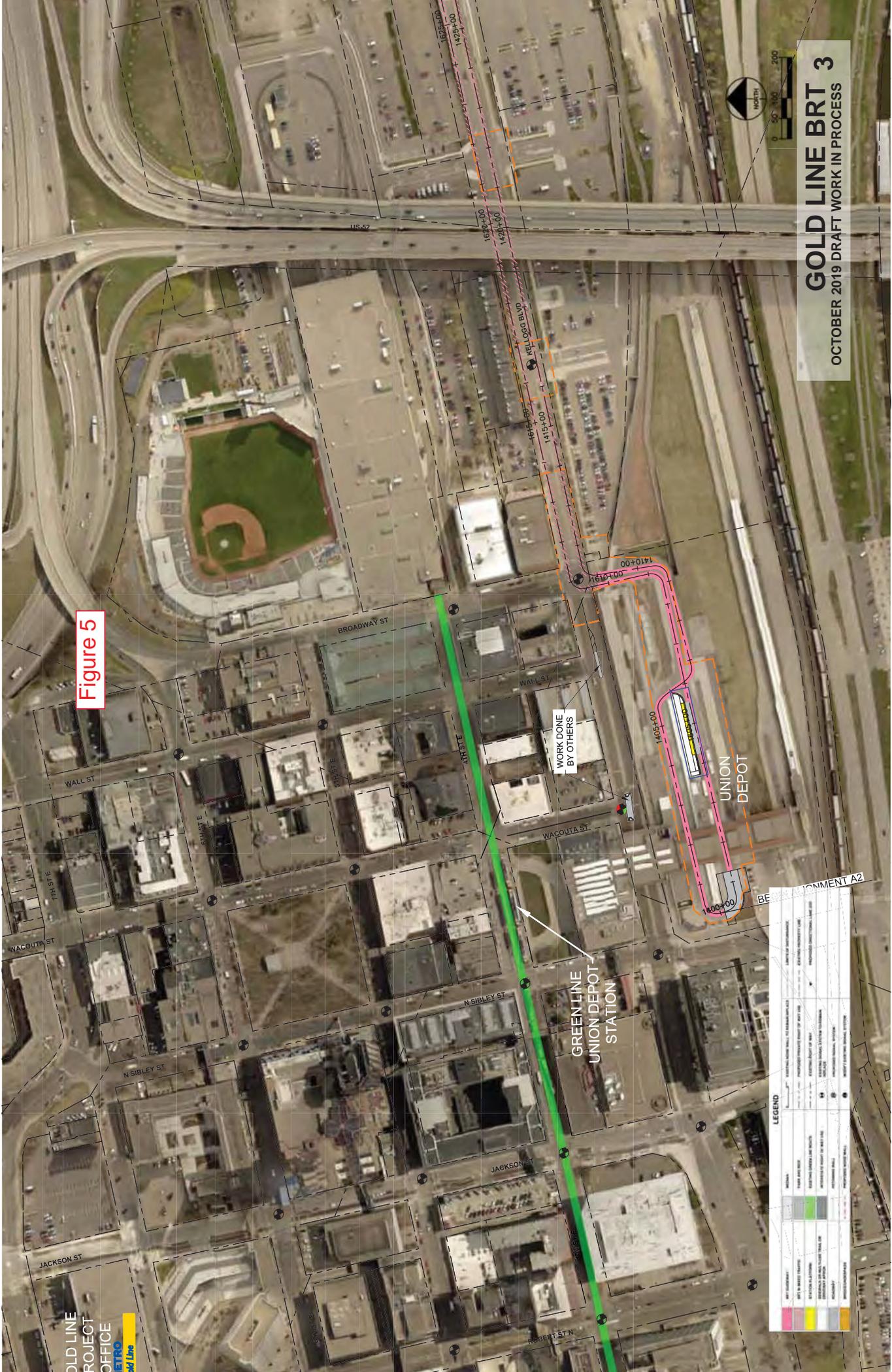


Figure 5



GOLD LINE BRT 3
OCTOBER 2019 DRAFT WORK IN PROCESS

GREENLINE
UNION DEPOT
STATION

WORK DONE
BY OTHERS

UNION
DEPOT

LEGEND

SYMBOL	DESCRIPTION	NOTES
[Pink Box]	EXISTING BRT	
[Green Line]	PROPOSED BRT	
[Yellow Box]	EXISTING STATION	
[Green Box]	PROPOSED STATION	
[Blue Box]	EXISTING DEPOT	
[Pink Box]	PROPOSED DEPOT	
[Orange Box]	EXISTING ROAD	
[Red Box]	PROPOSED ROAD	
[Black Circle]	EXISTING TRAFFIC SIGNAL	
[Black Circle]	PROPOSED TRAFFIC SIGNAL	
[Black Circle]	EXISTING LIGHT RAIL	
[Black Circle]	PROPOSED LIGHT RAIL	
[Black Circle]	EXISTING BUS STOP	
[Black Circle]	PROPOSED BUS STOP	
[Black Circle]	EXISTING BIKEWAY	
[Black Circle]	PROPOSED BIKEWAY	
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[Black Circle]	PROPOSED PATH	
[Black Circle]	EXISTING UTILITY	
[Black Circle]	PROPOSED UTILITY	
[Black Circle]	EXISTING TREE	
[Black Circle]	PROPOSED TREE	
[Black Circle]	EXISTING LANDSCAPE	
[Black Circle]	PROPOSED LANDSCAPE	
[Black Circle]	EXISTING FENCE	
[Black Circle]	PROPOSED FENCE	
[Black Circle]	EXISTING SIGN	
[Black Circle]	PROPOSED SIGN	
[Black Circle]	EXISTING LIGHT	
[Black Circle]	PROPOSED LIGHT	
[Black Circle]	EXISTING SOUND WALL	
[Black Circle]	PROPOSED SOUND WALL	
[Black Circle]	EXISTING WALL	
[Black Circle]	PROPOSED WALL	
[Black Circle]	EXISTING CURB	
[Black Circle]	PROPOSED CURB	
[Black Circle]	EXISTING SIDEWALK	
[Black Circle]	PROPOSED SIDEWALK	
[Black Circle]	EXISTING BIKEWAY	
[Black Circle]	PROPOSED BIKEWAY	
[Black Circle]	EXISTING PATH	
[Black Circle]	PROPOSED PATH	
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[Black Circle]	PROPOSED CURB	
[Black Circle]	EXISTING SIDEWALK	
[Black Circle]	PROPOSED SIDEWALK	

Figure 6

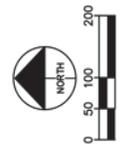
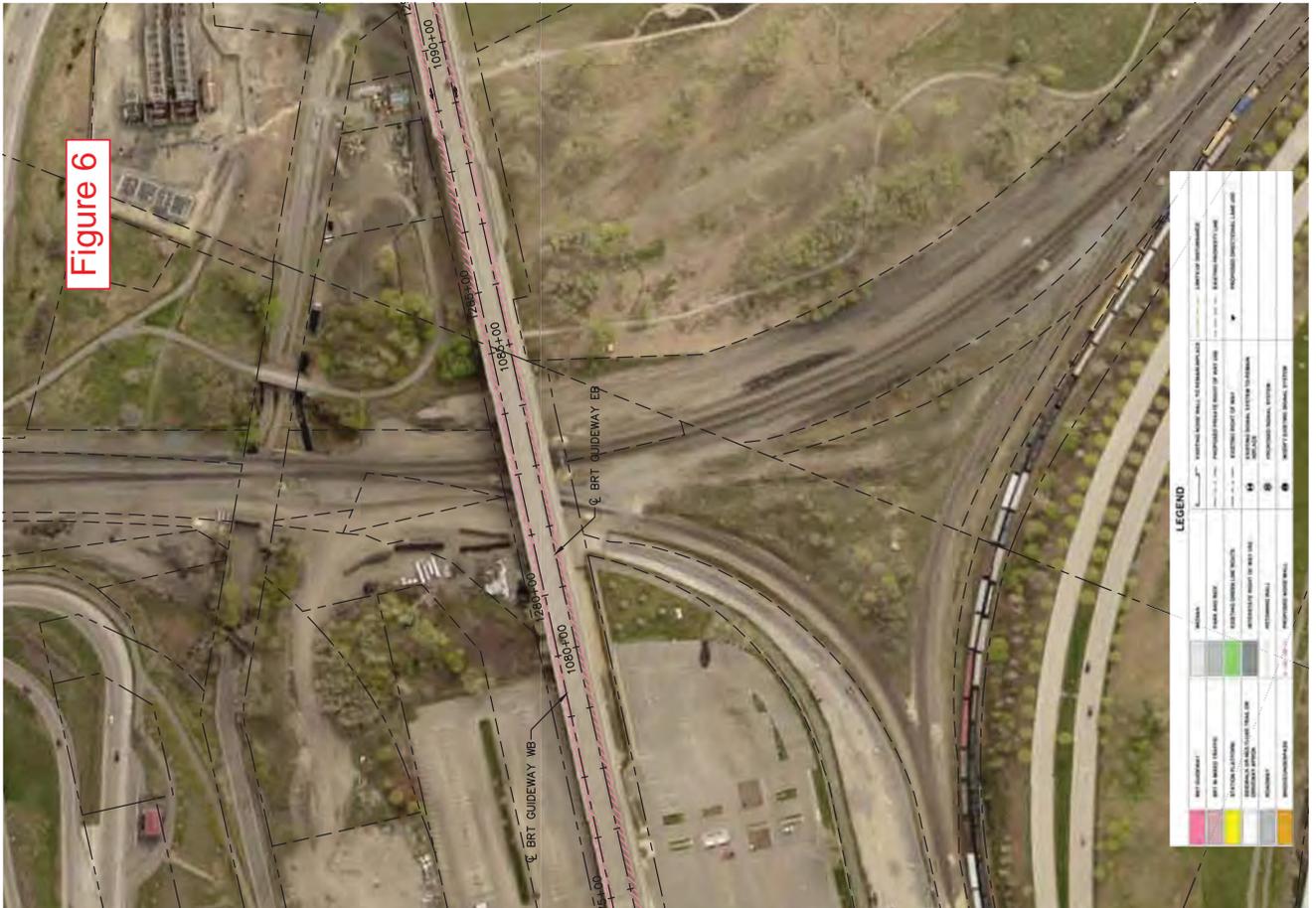
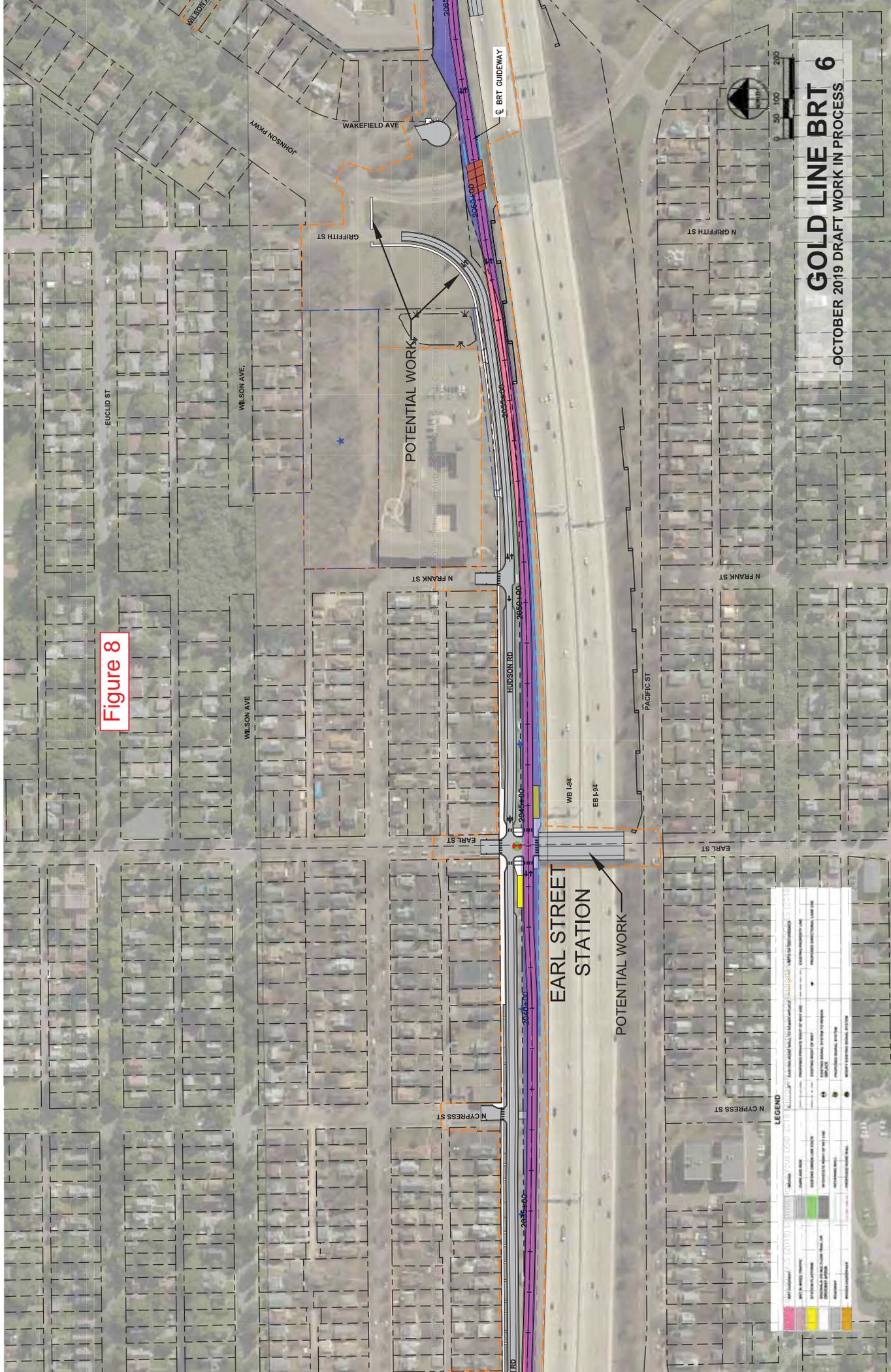


Figure 8



GOLD LINE BRT 6

OCTOBER 2019 DRAFT WORK IN PROCESS

LEGEND	
	STATION (2019) (2018)
	PLATFORM (2019) (2018)
	WORK AREA (2019) (2018)
	CONSTRUCTION AREA (2019) (2018)
	OTHER WORK AREA (2019) (2018)
	SIGNAL (2019) (2018)
	LIGHT RAIL (2019) (2018)
	BRT GUIDEWAY (2019) (2018)
	RIGHT OF WAY (2019) (2018)
	PROPOSED STREET (2019) (2018)
	PROPOSED SIDEWALK (2019) (2018)
	PROPOSED CURB (2019) (2018)
	PROPOSED UTILITY (2019) (2018)
	PROPOSED TREE (2019) (2018)
	PROPOSED LANDSCAPING (2019) (2018)
	PROPOSED LIGHTING (2019) (2018)
	PROPOSED SECURITY (2019) (2018)
	PROPOSED ART (2019) (2018)
	PROPOSED PUBLIC ART (2019) (2018)
	PROPOSED BICYCLE (2019) (2018)
	PROPOSED PEDESTRIAN (2019) (2018)
	PROPOSED WHEELCHAIR (2019) (2018)
	PROPOSED STROLLER (2019) (2018)
	PROPOSED BABY CARRIAGE (2019) (2018)
	PROPOSED SERVICE ANIMAL (2019) (2018)
	PROPOSED OTHER (2019) (2018)

Figure 13

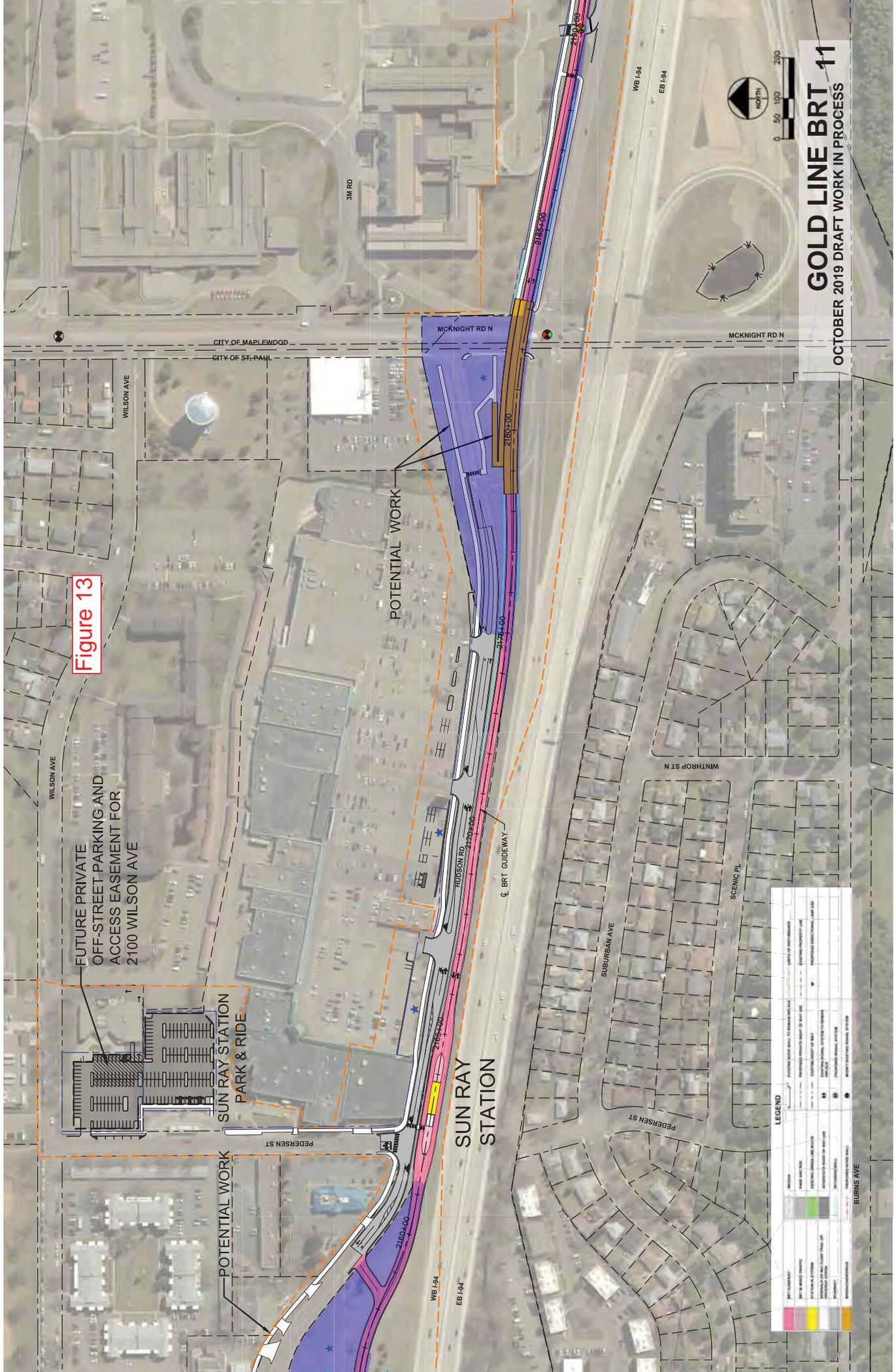
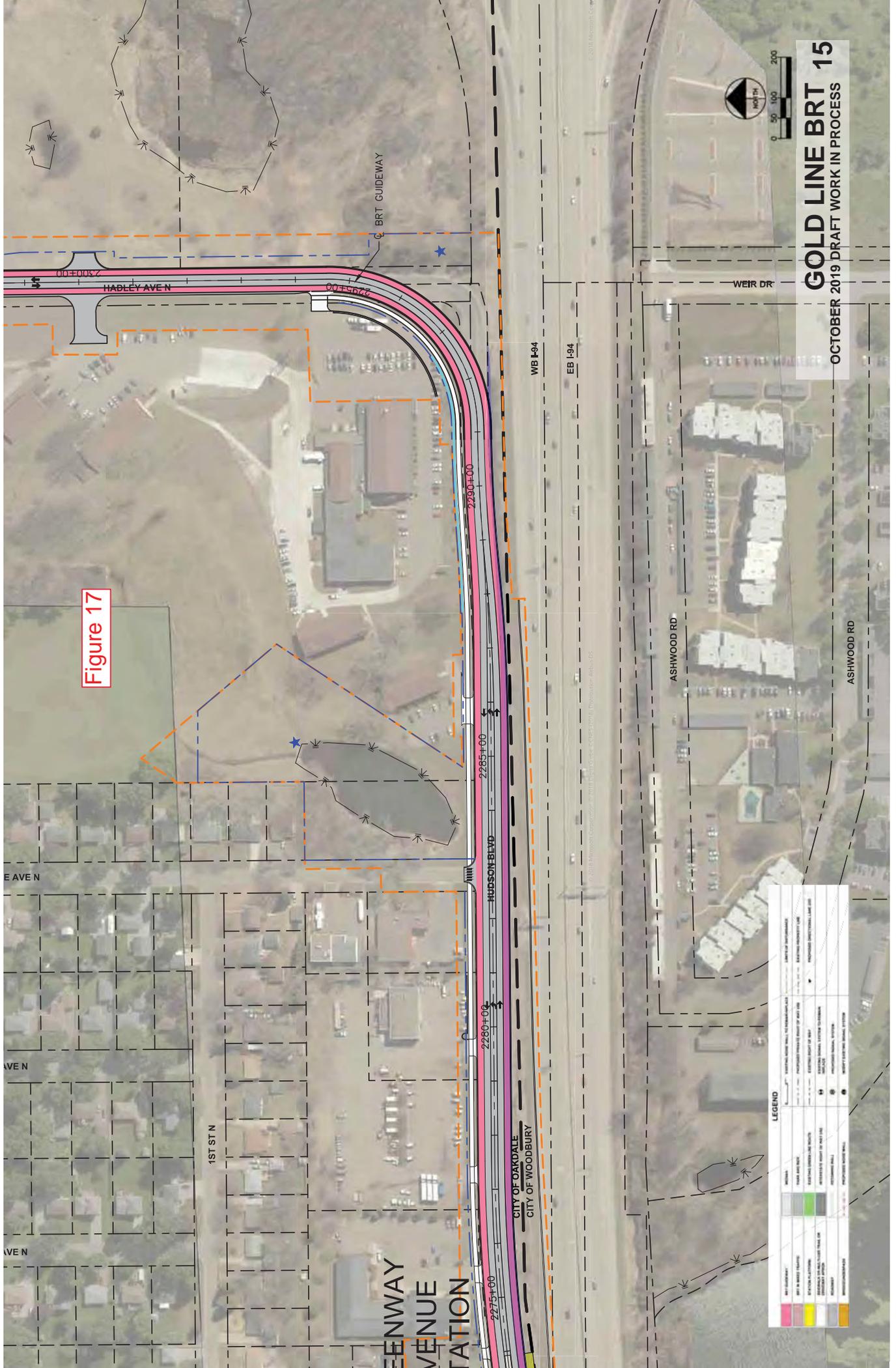


Figure 17



GOLD LINE BRT 15
OCTOBER 2019 DRAFT WORK IN PROCESS

LEGEND

	BRT GUIDEWAY		PROPOSED BRT LANE TO EXISTING LANE		LIMIT OF EXPOSURE
	BRT STATION		PROPOSED TRANSITION OF ROAD USE		EXISTING UTILITY LINE
	EXISTING STATION		EXISTING ROAD OF ROAD		PROPOSED UTILITY LINE
	PROPOSED STATION		PROPOSED TRANSITION TO BRT		PROPOSED UTILITY LINE
	PROPOSED STATION		PROPOSED TRANSITION TO BRT		PROPOSED UTILITY LINE
	PROPOSED STATION		PROPOSED TRANSITION TO BRT		PROPOSED UTILITY LINE
	PROPOSED STATION		PROPOSED TRANSITION TO BRT		PROPOSED UTILITY LINE



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GREENWAY AVENUE STATION

CITY OF OAKDALE CITY OF WOODBURY

HUDSON BLVD

ASHWOOD RD

WEIR DR

HADLEY AVE N

BRT GUIDEWAY

2275+00

2280+00

2285+00

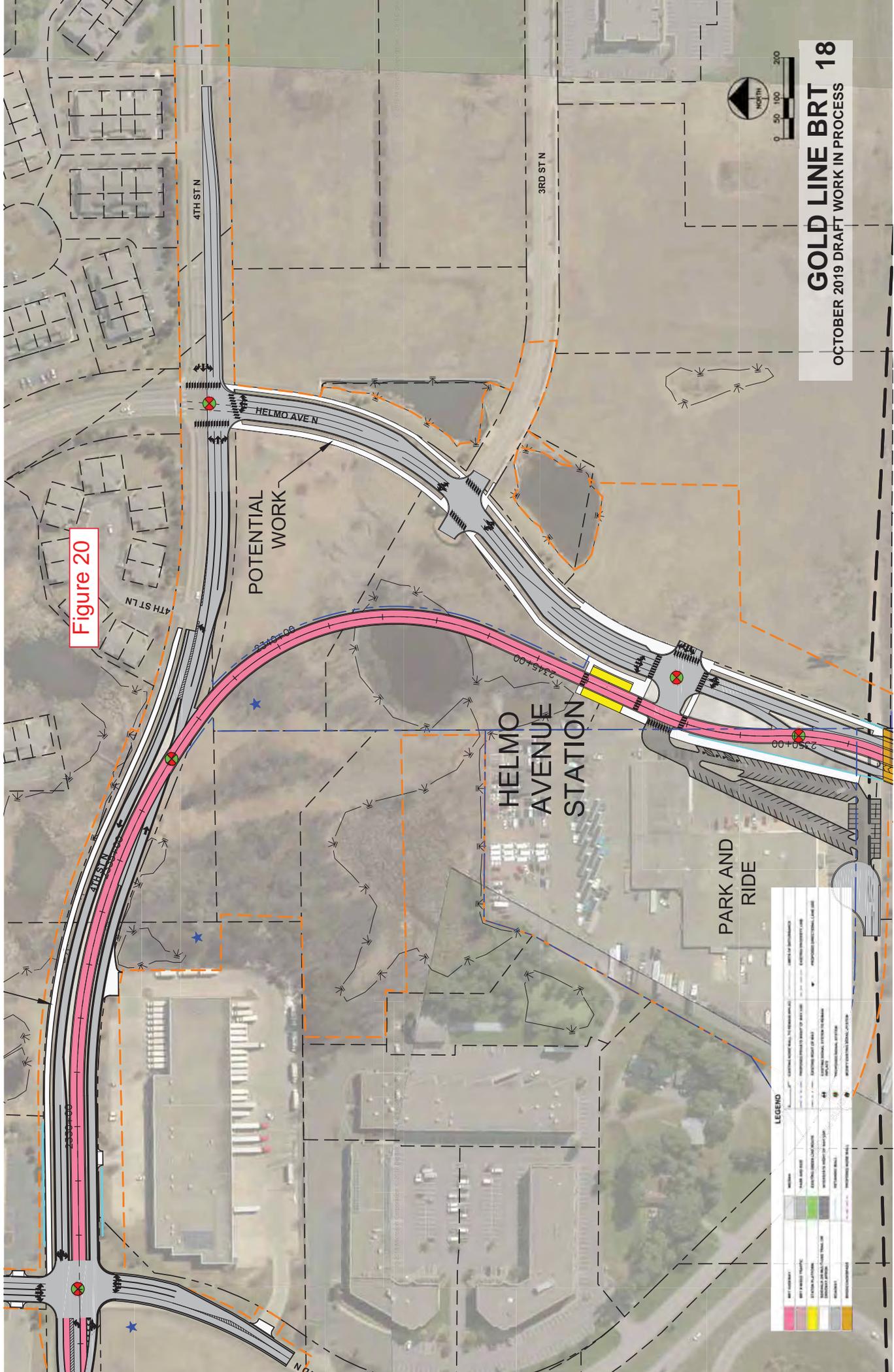
2290+00

WB I-94

EB I-94

ASHWOOD RD

Figure 20



GOLD LINE BRT 18
OCTOBER 2019 DRAFT WORK IN PROCESS

LEGEND

SYMBOL	DESCRIPTION	NOTES
[Pink Line]	BRT ROUTE	INDICATES BRT ROUTE
[Yellow Area]	STATION	INDICATES STATION AREA
[Blue Area]	POTENTIAL WORK	INDICATES POTENTIAL WORK AREAS
[Green Area]	LANDSCAPE	INDICATES LANDSCAPE AREAS
[Grey Area]	EXISTING ROAD	INDICATES EXISTING ROAD AREAS
[Dashed Line]	PROPERTY LINE	INDICATES PROPERTY LINE AREAS
[Red X]	UTILITY	INDICATES UTILITY AREAS
[Blue Star]	STATIONING	INDICATES STATIONING AREAS

