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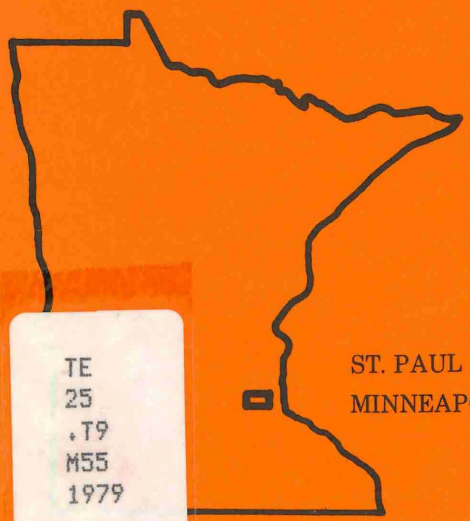
NSPORTATION
FEDERAL HIGHWAY ADMINISTRATION

FINAL ENVIRONMENTAL IMPACT STATEMENT FOR INTERSTATE 494

FROM 24th AVE. IN BLOOMINGTON TO THE MISSISSIPPI RIVER BRIDGE IN SOUTH ST. PAUL



ST. PAUL
MINNEAPOLIS

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PREPARED BY

DEPARTMENT OF TRANSPORTATION
STATE OF MINNESOTA

FHWA - MN - EIS - 77-03-F

Federal Highway Administration

Region 5

Minnesota Project I-494

State Projects 1985, 1986, 2785

Interstate Highway 494 in Hennepin and Dakota Counties, Minnesota

From 24th Ave. in Bloomington to the Mississippi River Bridge in South St. Paul

ADMINISTRATIVE ACTION

FINAL

ENVIRONMENTAL IMPACT STATEMENT

AND

FINAL 4 (f) STATEMENT

U S DEPARTMENT OF TRANSPORTATION

Federal Highway Administration

Minnesota Department of Transportation

Division of Highways

Submitted pursuant to 42 USC 4332(2) (C),

23 USC 128(a), 49 USC 1653(f) and

Minnesota Statutes 116D.01 et seq

September 13, 1978
Date

for Kermit K. McRae
Deputy Commissioner
Bureau of Policy and Planning
Minnesota Department of Transportation

January 23, 1979
Date

/S/ Philip O. Russell for
/S/ W. G. Emrich
Director
Office of Environment and Design
FHWA, Region V

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SUMMARY SHEET

(1) FEDERAL HIGHWAY ADMINISTRATION ACTION FOR:

Draft (X) Final EIS

(X) Final 4(f) Statement

(2) ADDITIONAL INFORMATION ABOUT THIS PROPOSAL AND STATEMENT AVAILABLE FROM:

District Director
Mn DOT, Division of Highways — District 9
3485 Hadley Avenue North
P.O. Box 2050
North St. Paul, MN 55109

Division Administrator
Federal Highway Administration
Suite 490, Metro Square Building
St. Paul, MN 55101
612-725-7001

(3) DESCRIPTION OF PROPOSED ACTION:

The proposed action provides for the construction of the only uncompleted section of the I-494/694 beltline route that encircles the Twin Cities metropolitan area. This section will be approximately 11 miles long and will pass through the cities of Bloomington, Eagan, Mendota Heights, Inver Grove Heights, Sunfish Lake and South St Paul.

The proposed section of I-494 will be a 6-lane divided freeway. It will begin near 24th Ave. in Bloomington and extend eastward to the Mississippi River Bridge in South St. Paul. Existing sections of I-494 on each end of the project will be reconstructed to fit the new 6 lane proposal. These sections will either be constructed concurrent with this proposal or under a separate action.

Also proposed is reconstruction on some of the existing highways that will intersect with proposed I-494. These are as follows:

TH 5 from I-494 to 1.3 miles north.

TH 55 from about 0.5 mile north of I-494 to the junction of TH 49.

TH 49 from Mendota Heights Road to the south junction of TH 55.

TH 110 from TH 52 to I-494.

Other adjacent or intersecting roads in the project area that are affected by the construction of I-494.

(Fig 5-2, p 57 shows the location and termini of the proposed actions).

(4) ACTIONS REQUIRED BY OTHER FEDERAL AGENCIES:

US Coast Guard Permit (for proposed bridge over the Minnesota River)

US Corp of Engineers (Sections 10 and 404 Permits)

Heritage Conservation and Recreation Service (6[f] involvement — proposed ponding area in Fort Snelling State Park).

(5) PURPOSE AND NEED FOR THE PROPOSAL:

The proposed section of I-494 will complete the circumferential route of I-494, providing the final link in the portion which extends near the southern border of St. Paul and Minneapolis.

Included in the immediate project area are the third largest business district in the Metropolitan Area and other high activity centers such as the Minneapolis-St. Paul Airport and the South St. Paul Stockyards. Dakota County, the county in which most of the proposed work will fall, is the fastest growing county in the state. The proposed corridor will pass through a part of the county which has a heavy concentration of major industries. The highway improvements in this proposal will help provide more efficient transportation routes for the area.

(6) 4(F) AND 6(F) INVOLVEMENT

Proposed I-494 will pass between two portions of Fort Snelling State Park (FSSP). Although the proposed highway will be constructed on land which the Division of Highways (DH) owns, the drainage plan for the proposed highway requires the construction of a sedimentation pond on park land.

Constructing the pond in FSSP constitutes a 4(f) involvement because the park is a publicly-owned recreation area and wildlife and waterfowl refuge of state and local significance. It's a 6(f) involvement because the Minnesota Department of Natural Resources (DNR) has used Land and Water Conservation Funds (LAWCON Funds).

Fort Snelling State Park is the site of the Fort Snelling and Mendota Historic Districts. Proposed I-494 will have no involvement with the two districts, however. Also, the Minnesota Historical Society has analyzed the proposed I-494 corridor for historic, archaeological, architectural, and cultural sites which are on or eligible for inclusion on the National Register of Historic Places. The Society found no such sites along the corridor. (See letter from The Minnesota Historical Society in Section X, Coordination, p 129.)

(7) THE PROPOSED ACTION WILL HAVE THE FOLLOWING ENVIRONMENTAL IMPACTS:

a. Provide a direct route through the project area for regional and interstate motorists and improve travel conditions for local motorists.

b. Divert traffic away from several congested highways, thereby reducing the accident potential and fuel consumption.

c. Help the local communities to reach their development goals.

d. Remove about 46 homes, 4 businesses and about 1406 acres of land (912 acres of this already acquired).

e. Change the landscape, and remove wetlands, vegetation, and wildlife habitat.

f. Introduce noise into a new corridor. Under Alt B3, the Selected Alternate, 41 residentials uses cannot be attenuated.

g. Intrude visually on new areas.

SUMMARY SHEET (CONT)

(8) ALTERNATES:

The DEIS considered the No-Build Alternate (Alt) and three design alternates in the Preferred Corridor — Alt B1, B2, and B3. It also discussed a Historical Alternate, Alt A. Subsequent to an evaluation of the comments received on the DEIS and the Location — Design Public Hearing for the proposed highway (August 25, 1977), *Alt B3 was chosen as the Selected Alternate.*

Alt B1 included I-494, a relocated section of TH 55, and improvements on existing TH's 5, 55, 49, and inplace I-494 in South St. Paul.

Alt B2 was in essence a staging of Alt B1. Under Alt B2, all the highway improvements of Alt B1 would have been made, with the exception of the relocated section of TH 55.

The Alt B2 design would have allowed for the addition of TH 55, but the actual construction would not have occurred until the need developed.

The Selected Alternate. Alt B3 excludes the relocated section of TH 55 and any provision for its construction in the future. It includes all the other improvements of Alt B1. The reasons for choosing Alt B3 as the Selected Alternate are as follows: (1) It impacts 21 less acres of wetland and removes 185 less acres of undeveloped land, six less residences, and one less farmstead than Alts B1 and B2, (2) New — and lower — traffic forecasts indicate that the lesser design of Alt B3 (mainly the exclusion of the relocated section of TH 55) would be adequate, and (3) Alt B3 is consistent with the transportation plan of the Metropolitan Council, Regional A-95 Clearinghouse.

(9) STATE GOVERNMENT AND MULTI-STATE RESPONSIBILITIES:

a. The Federal controls associated with this action will not cause any impact on the State government.

b. This action will have no effect on adjacent states or on any multi-state responsibilities.

(10) MISSISSIPPI RIVER CORRIDOR CRITICAL AREA:

Two sections of proposed I-494 will fall within the Mississippi River corridor critical area. The Minnesota Environmental Quality Board, in their response to the DEIS, indicated that the project appears to be consistent with the interim development regulations that pertain to an urban open space (near the Minnesota River) and a urban diversified district (in South St. Paul).

(11) PROJECTIONS

Population, employment, and traffic projections for the year 2000 in this report are, unless otherwise noted, based on outdated Metropolitan Council (MC) data. Revised MC projections and new (and lower) traffic numbers will serve as a basis for the I-494 design.

(12) COMMENTS ON THE DRAFT EIS WERE REQUESTED FROM THE FOLLOWING AGENCIES AND PUBLIC GROUPS:

U.S. Department of Defense
*U.S. Department of Agriculture
*U.S. Department of the Army
Corps of Engineers, St. Paul District
*U.S. Department of Housing and Urban Development
*U.S. Department of Commerce
U.S. Department of Health, Education and Welfare
*U.S. Department of Interior
*U.S. Department of Transportation
*Second Coast Guard District
Federal Railroad Administration
*Federal Aviation Administration
Urban Mass Transportation Administration
Advisory Council on Historic Preservation
*Council on Environmental Quality
*Environmental Protection Agency
Federal Energy Administration
*Federal Power Commission
Minnesota Department of Agriculture
Minnesota Department of Health
Minnesota Department of Water Resources Board
*Minnesota Energy Agency
Minnesota Department of Economic Development
*Minnesota Environmental Quality Board
*Minnesota Historical Society
*Minnesota Department of Natural Resources
*Minnesota Pollution Control Agency
*Minnesota State Planning Agency
*Metropolitan Council (A-94) Clearinghouse
*Metropolitan Transit Commission
Metropolitan Airport Commission
*Metropolitan Waste Control Commission
*Dakota County
Hennepin County
*City of Bloomington
*City of Eagan
*City of Mendota Heights
*City of Sunfish Lake
*City of Inver Grove Heights
*City of South St. Paul
*City of Apple Valley
*City of Burnsville
*City of West St. Paul

*Indicates agencies that responded to the DEIS

INTRODUCTION

Need: Bases For The Proposed Action

History, Development, And Current Status

NEED: BASES FOR THE PROPOSED ACTION

Passage of the Interstate Highway Acts of 1944 and 1956 established a 41,000 mile system of new highways throughout the United States, connecting forty-two state capitals and 90% of all cities with more than 50,000 population. The routes of two of these Interstate highways, designated as Interstates 35 and 94, pass through the Minneapolis-St. Paul area (Fig 1-1).

Interstate 35 is a north-south route which originates in Laredo, Texas and terminates in the Duluth, Minnesota, area. Through the Minneapolis-St. Paul area, I-35 divides into two sub-routes. One, I-35W, passes through the Minneapolis area. The other, I-35E, passes through St. Paul.

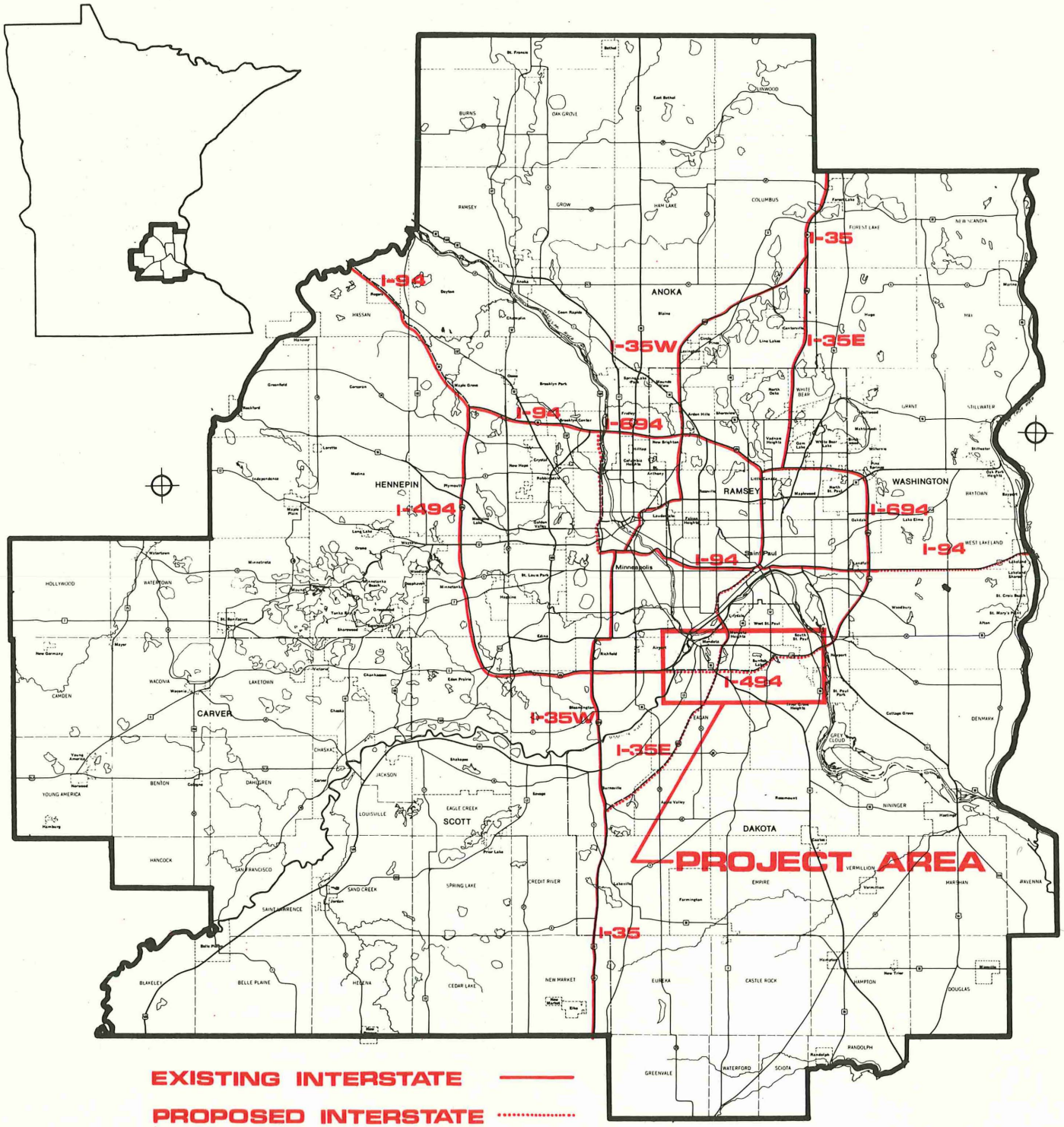
Beltline Route, I-694 & I-494

Interstate 94 begins in Billings, Montana at an intersection with I-90 and terminates just north of Detroit, Michigan. Within the Minneapolis-St Paul area, I-94 (going eastward) enters at the northwest corner and splits into three routes. Two of these routes form a circumferential route around the central cities — I-694 going north and I-494 south. Known as the beltline route, they eventually tie in again on the east side of the metropolitan area with I-94, which passes near the central business districts (CBD) of Minneapolis and St. Paul.

The beltline route allows through traffic from I-94 and I-35 to skirt the two CBD's and the residential streets of the core metropolitan area. Also, the route carries traffic to the high activity centers and suburban residential areas along the periphery of the metropolitan area. The proposed section of I-494 will complete the beltline route providing the final link in the portion which extends through Hennepin and Dakota Counties, near the southern border of St. Paul and Minneapolis.

The corridor location shown in Fig 5-1 (see p 51) as the Preferred Corridor was the only location considered for this final link of I-494. Earlier studies considered alternative locations but found them unacceptable to the local cities and ineffective in meeting the transportation needs of the area (see Alternates, Introduction, p 50). Subsequently, the cities and Dakota County developed their comprehensive plans, basing them on the Preferred Corridor. Also, the Metropolitan Council (MC)[1] has included proposed I-494 in the transportation plan which it developed for the region, placing the highway in the same corridor as the preferred corridor (see Function Classification Plan, Fig 1-3, p 13). Another major factor in restricting the proposed route to the Preferred Corridor is the location of the termini of the completed sections of I-494 in Bloomington and So St Paul. Both are well defined and were built as part of the design that placed the proposed highway in the corridor shown as the proposed route.

[1] The MC is the designated planning coordinator, A-95 Clearinghouse, and 3C Planning Agency for the St Paul-Minneapolis Metro Region.



INTERSTATES THROUGH ST. PAUL-MPLS AREA

FIGURE 1-1

Improved Section of T.H. 55

Trunk Highway (TH) 55, two lanes over most of its length, connects Minneapolis and the farming and industrial areas in southeastern Minnesota. It passes through the major industrial areas of Eagan and Mendota Heights and through the proposed I-494 and I-35E interchange area. (See Fig 1-2, Existing Highways, p 7.)

The DEIS considered two design alternates — Alt B1 and B2 — that included a relocated section of TH 55. The projected growth in the project area and the resultant high traffic forecasts were bases for the inclusion of the relocated section of TH 55. Subsequent to the publication of the DEIS and the Design Public Hearing. (August 25, 1977), the MC issued new population, employment, and housing projections that resulted in lower traffic forecast for the TH 55 corridor. The new forecasts indicate that TH 55, although it will still become a high-volume corridor, will no longer need to be relocated.*

Inplace TH 55 through the project area will need some improvements, however. The existing section, averaging 9.4 access points per mile, will not be able to handle the existing and forecasted volumes without serious congestion and safety problems. Plans are to construct two additional lanes, turn lanes, and bridges across proposed I-494 and I-35E. The section that will undergo construction extends from about 0.6 miles north of proposed I-494 to the junction of TH's 55 and 49 (see Fig 2-1, Proposed Highway Construction, p 21). These improvements will help accommodate the projected traffic volumes. Also, they will help coordinate TH 55 with proposed I-494 and the remaining highways in the project area.

Transit Considerations

This EIS doesn't consider a separate alternate for transit. The MC and the Metropolitan Transit Commission (MTC)[2], agencies that would decide on a transit alternate, consider proposed I-494 essential to any mode of transit in the proposed corridor. Transit plans (1990) for the region and project area include I-494. (See Transit Plans, p 12.)

Following in this section is a discussion of the bases for the proposed action. These are as follows:

(1) The existing and proposed heavy trip generators in project area.
(2) The deficiencies on existing highways in the project area, particularly on the link between completed sections of I-494.
(3) The proposed highway's function in the regional transportation system.

*The relocated section was never part of the MC's Transportation Plan. See Discussion on pages 12 and 56.

[2] The MTC owns and operates the metropolitan transit system and is responsible for developing and implementing the transit system for the region.

LOCAL GENERATORS

EXISTING

The concentration of industries and businesses in the project area combine to make it one of the major traffic generators in the State. Located here are a number of large employment centers (about 60,000 persons work in the project area and surrounding communities) plus a number of companies with large shipping and receiving operations. The So St Paul stockyards, for example, handled over 300,000 trucks in 1974, more than any other single location in Minnesota. Truck traffic from the remaining major industries in the project area (some 40 in the Eagandale Industrial Park alone) adds significantly to this total. Currently, the traffic entering or leaving the project area from the east and west must use the existing link between completed sections of I-494 — TH 110, the Mendota Bridge (TH 55), and TH 5.

PROPOSED

Development planned for the project area will mean a considerable increase in vehicular trips in the project area. An estimated 25,000 to 30,000 persons will work in the Eagandale Industrial Parks (near proposed I-494) after its full development. A major diversified center planned for Eagan (near the industrial parks) will contain office, shipping, residential, and possibly medical space. Having all these, it will also attract a large number of vehicular trips, from both outside and within the immediate project area. Thus, traffic to the industrial park and the diversified center will increase the need for a new bridge crossing and for highways with more capacity.[3]

Although new development in Bloomington won't be as extensive as in northern Dakota County, some development will occur. One area of undeveloped land is near 24th Ave. and proposed I-494. Construction of a multi-use complex is presently underway here. The complex will have residential units as well as office space and commercial facilities. Nearby, the Minneapolis-St. Paul International Airport (under the jurisdiction of the Metropolitan Airports Commission) plans major expansion. Currently, the 3,000-acre airport employs about 16,000. With this new development and the existing development farther west along I-494 — plus the Metropolitan Sports Complex — Bloomington and the surrounding area will continue to be one of the highest traffic generators in the Metropolitan region. As with northern Dakota County, the area is highly dependent on the I-494 beltline as an east-west transportation route.

[3] For additional discussion of future trip patterns in the project area, see the Transportation Planning Report for I-494, prepared by the Transportation Planning Unit, District 9 Resource Section, Mn DOT, Division of Highways.

Development plans and attendance projections for Fort Snelling State Park and the Minnesota Zoological Gardens (just south of Eagan) also increases the need for proposed I-494. According to officials of Fort Snelling State Park, about 754,000 people visited the park in 1974. Currently, the park is undergoing improvements, which include the development of an extensive trail system and the restoration of the Fort Snelling and Mendota Historic Districts. Park officials estimate that attendance in 1980 will be about 2 million. The Zoological Gardens, a 460-acre facility, which opened in May 1978, will have about 1.3 million visitors annually (2.2 million by 2000). About 60% of these will come from the Minneapolis-St. Paul area. The main route for visitors coming to the park from the suburbs east, southeast, and northeast of St. Paul will be I-494. Zoo visitors coming from the same general area will use I-494 to reach I-35E, then continue south.

DEFICIENCIES ON PROJECT AREA HIGHWAYS[4]

EXISTING I-494 LINK

T.H. 110

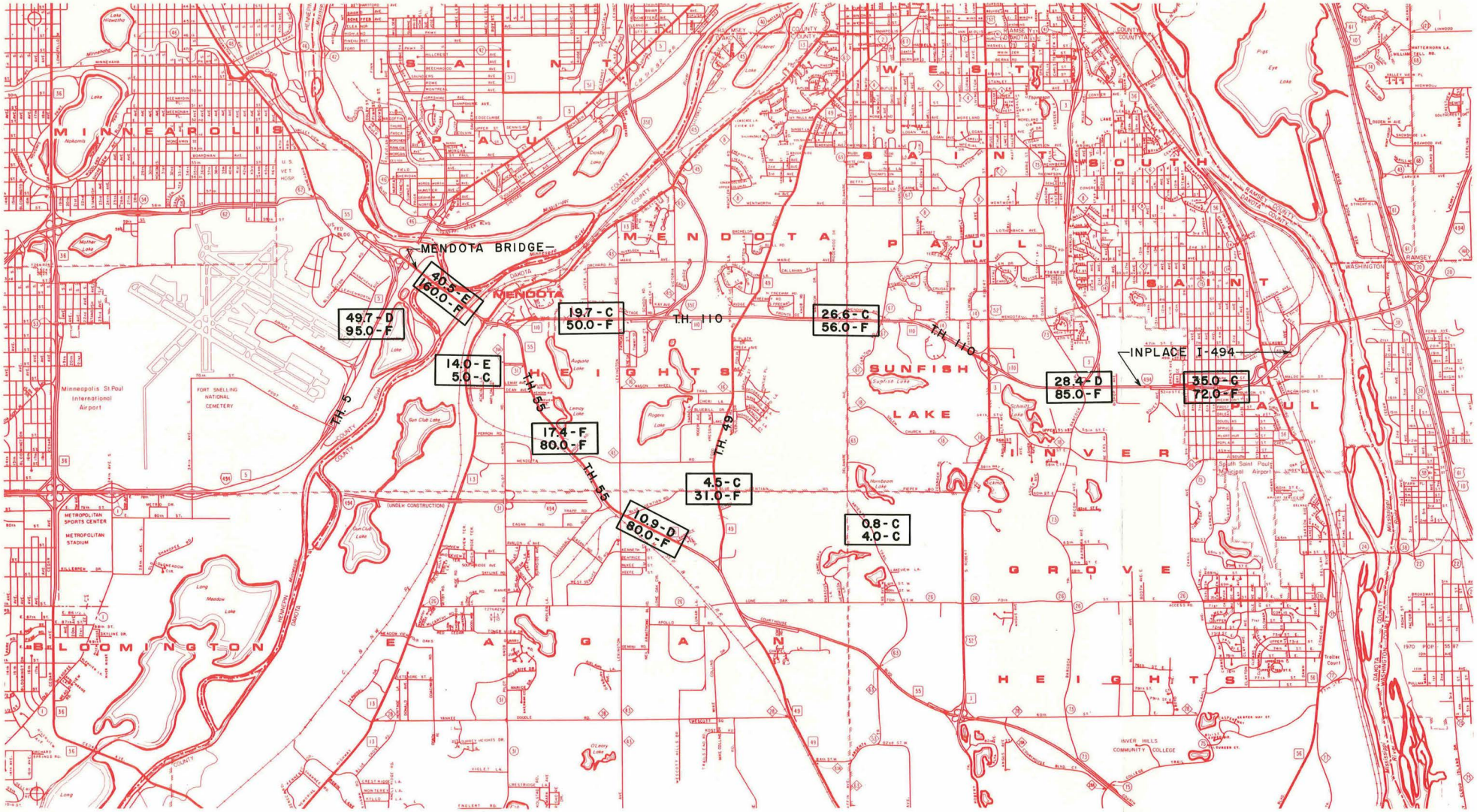
Three highways serve as the link between the completed sections of I-494 (see Fig 1-2, p 7): TH's 110 and 5 and the Mendota Bridge (TH 55). Trunk Highway 110 is a 4-lane expressway. Although theoretically functioning at level of service C[5] with a steady flow of traffic most of the time, TH 110 approaches undesirable levels of service during rush hours. Between TH 13 and 7th Av in So St Paul, it carries about 20,000 to 28,000 vehicles a day. With only partial access control, it averages 6.1 access points per mile and has five major crossroads with signal lights.

From 1972 to 1975, the 5.9 mile section of TH 110 from TH 55 in Mendota to I-494 in So. St. Paul had an average of 2.31 accidents per million vehicle miles (PMVM). This is about the average on similar 4-lane highways in District 9*and somewhat above the average of 1.69 PMVM on divided highways with controlled access (other than freeways) in rural areas throughout the nation. (The latter figure comes from a study by Solomon, titled, "Accidents on Main Rural Highways Related to Speed, Driver, and Vehicle," BPR, USSPC, July 1964.)

[4] Information summarized in this section comes from the Transportation Planning Report for I-494 in Hennepin and Dakota Counties, Mn DOT, Division of Highways, Transportation Planning Unit, Oakdale, Mn, September 1976.

[5] The Level of Service concept is a way of evaluating traffic flows. Levels A and B are best (free flowing traffic), C is acceptable, D is unstable but still passing, E is very unstable (stopping can occur), and F is completely jammed. Generally, motorists began to sense congestion at D.

* District 9 of the Minnesota Department of Transportation, Division of Highways, encompasses the eastern part of the Twin Cities Metro Area. It includes Chisago, Dakota, Ramsey, Washington, and parts of Anoka, Goodhue, and Pine Counties.



KEY

Average Daily Traffic 1974 (in 1000's)

Level of Service 1974

000.0-X
000.0-X

2000 (in 1000's)

2000

LEVEL OF SERVICE

C - Acceptable Flow
D - Unstable, but Acceptable
E - Unstable, Some Possible Stopping
F - Jammed

EXISTING HIGHWAYS

N

0 2000 4000

INTERSTATE 494

FIGURE 1-2

Table 1-1 gives the accident rates for approach vehicles at main intersections along TH 110. The intersection at TH 55, 110, and 13 (the approach to the Mendota Bridge) has the highest rate (5.13). The accident rate at this intersection is consistently among the highest in District 9, the number of accidents ranking either first or second. A recent study of high-volume, signalized intersections in District 9 showed an average rate of 1.9 accidents per million approach vehicles.

TABLE 1-1

ACCIDENT RATES
AT MAIN TH 110 INTERSECTIONS

INTERSECTIONS Along TH IIO	ACCIDENT RATE Per Million Approach Vehicles
TH 13-55	5.13
Lexington Ave. (CR 43)	1.46
Dodd Road (TH 49)	2.53
Delaware Ave. (CSAH 63)	1.23
TH 52/3	2.24
Babcock Trail (CSAH 73)	2.08

Mendota Bridge

The Mendota Bridge (TH 55) — 4 lanes, constructed in 1926 — is one of two bridges between northern Dakota County and Hennepin County.[6] Average daily traffic (ADT) on the bridge totals about 40,500 vehicles (1974). Level of service is E, which means the traffic volume on the bridge is at capacity and the flow is unstable with frequent delays.

TH 5

The section of TH 5 proposed for lane additions in this proposal has an ADT of about 49,700 vehicles with a level of service D. It has an average accident rate of 2.7 PMVM, somewhat higher than the average of 2.0 PMVM on other freeways in the Metropolitan Area.

[6] The Cedar Av Bridge, the second bridge, is about 5 miles south of the Mendota Bridge and 3 miles south of the proposed I-494 bridge. It serves a north-south movement; the Mendota Bridge serves northwest-southeast and east-west movements.

I-494

The section of inplace I-494 in So St Paul proposed for reconstruction in this proposal, designed in 1955 and built in 1960 (traffic design year of 1975), is one of the oldest stretches of interstate in the metropolitan region. Although capable of carrying present volumes, it does have some safety deficiencies. By present standards, the acceleration lanes are inadequate and weaving distances are too short (near the Concord Street interchange). Although the accident rate of 2.4 PMVM is only slightly higher than similar highways in the Metropolitan region, the high speed and virtually outmoded design may have been a factor in some of the serious accidents that have occurred along the section (166 injuries and 14 deaths over a ten-year period).

TH 55

Trunk Highway 55 is a 2-lane rural highway from TH 110 to TH 49 and a 4-lane expressway southeast of TH 49 (see Fig 1-2, p 7). It connects the rural and developing areas of Dakota County with Minneapolis and its southeastern suburbs. Initially, the highway permitted fairly high-speed movements and provided access to adjacent homes, farms, and fields without the two functions conflicting. As the years passed, however, more development occurred, increasing the local access function and creating a conflict in the local and through traffic movements. This trend is continuing in the project area, particularly in the industrial parks near the proposed I-494 corridor. Presently, the highway averages about 9.4 access points per mile through the project area.

FUTURE CONDITIONS

Although construction of proposed I-494 would mean an immediate alleviation to traffic congestion and an improvement in traffic safety on project area highways, projections indicate that it will be even more essential to good transportation in the area and region by the year 2000. With the exception of Sunfish Lake, the cities in the project area will remain high on the list of those experiencing marked growth. The closeness of the project area to St. Paul and Minneapolis, the convenience of the railroad line and trunk highways leading into it, the excellent suitability of the land for building, and the Metropolitan Council's (MC) designation of it as an urban service area [7] with a high development potential — all are points which will continue to attract developers to the area.

Projections indicate almost intolerable travel conditions on Project Area highways by 2000 if I-494 is not built. Desire Volumes[8] on the Mendota Bridge could be almost 3 times its capacity. Trunk Highway 110 will also have serious overloads with volumes ranging from 30,000 to 85,000 a day, or 20% to 100% above its capacity as a 4-lane expressway. Similar increases will occur on TH 5. Also, even if this proposal isn't implemented, the section of I-494 in So St. Paul will require at least two additional lanes plus interchange revisions before the year 2000 to operate well during rush hours.

[7] An area that's either receiving or is designated to receive (by the Metropolitan Council) improvements necessary for urban development.

[8] Theoretical volumes of traffic that would want to use the highway.

FUNCTIONAL CLASSIFICATION AND TRANSIT PLAN

HIGHWAY SYSTEM

Proposed I-494 is part of the transportation system planned for the seven-county metropolitan region, called the Functional Classification Plan (FCP). (Figure 1-3 shows that part of the plan in the Project Area.) Interstate 494's role in the plan is that of a principal arterial, a high-speed highway with fully controlled access.

Other major highways in the Project Area included in the FCP are proposed I-35E[9] and TH's 36 and 3, both freeways. The plan also includes other county State Aid and Trunk Highway improvements in the Project Area. All the cities in the Project Area — with the exception of Sunfish Lake — consider the FCP important to their economic growth (indicated by their comprehensive plans). Dakota and Hennepin Counties also take this position. The counties and the municipalities have formulated their comprehensive plans on the basis that the highway improvements (including I-494) would be made.

The highway plan is the product of years of planning. Participants included the MC, DH, FHWA (Federal Highway Administration) and various counties and municipalities in the seven-county metropolitan region. A number of major studies figured in the planning, some exclusively transportation, others transportation and environmental.[10] None of the studies suggested changes in the locations proposed for the interstate highways. Rather, the studies which came later substantiated the conclusions of the earlier ones: The interstate highways and other freeways, located as proposed from the late 1950's and 1960's, would play a vital role in the regional transportation plan.

Interstate Study Committee

More recently, the State of Minnesota initiated another study of the Interstate system in the Metro area. During 1975, the State Legislature passed a bill which directed the Metropolitan Council, the Council's Transportation Advisory Board, and the city councils of the affected cities to review the unfinished sections of the Interstate System in the seven-county Metropolitan region. The legislature directed that a committee be formed to aid in the study.

[9] The Draft EIS for I-35E was circulated for comment in June 1976. The Final EIS was circulated in August 1977.

[10] The following two studies are examples of the major studies that helped formulate the system: Wallace, McHarg, Roberts, and Todd. An Ecological Study of The Twin Cities Metropolitan Area. Philadelphia, PA 1969 and A Summary Report of Travel In The Twin Cities Metropolitan Area, Metropolitan Council, St. Paul, Mn 1974.

Following 26 weekly meetings, the committee, called the Interstate Study Committee, recommended completion of six of the seven unfinished Interstate links. Interstate 494 in this proposal was one of the segments recommended for completion. The resolution urged that I-494 be built along the currently proposed corridor. Following are some of the conditions which the Committee said should govern the construction:*

A) That I-494 in this area be a minimum 6-lane facility.
B) That there be complete, full interchange facilities between 494 and 35E.
C) That the direct interchange between TH 55 and the 494-35E facilities be de-emphasized with access provided by local minor arterial routes.
D) That Highway 55 be retained in its present alignment for a long-term basis, thereby eliminating the dual/dual interchange design.
E) That planning for a second Mississippi River Bridge at So St Paul be continued to accommodate future traffic needs.
F) That the basic design solution in the corridor be generally based on the first stage development proposal as presented by the Division of Highways during the course of these sessions,[11] with special emphasis on concerns of all communities.
G) That all construction shall be accomplished in a manner so as to provide maximum concern for the impact of noise, vibrations, air, and water pollution on contiguous properties throughout the corridor.

The MC and the Council's Transportation Advisory Board passed similar resolutions in support of building I-494.

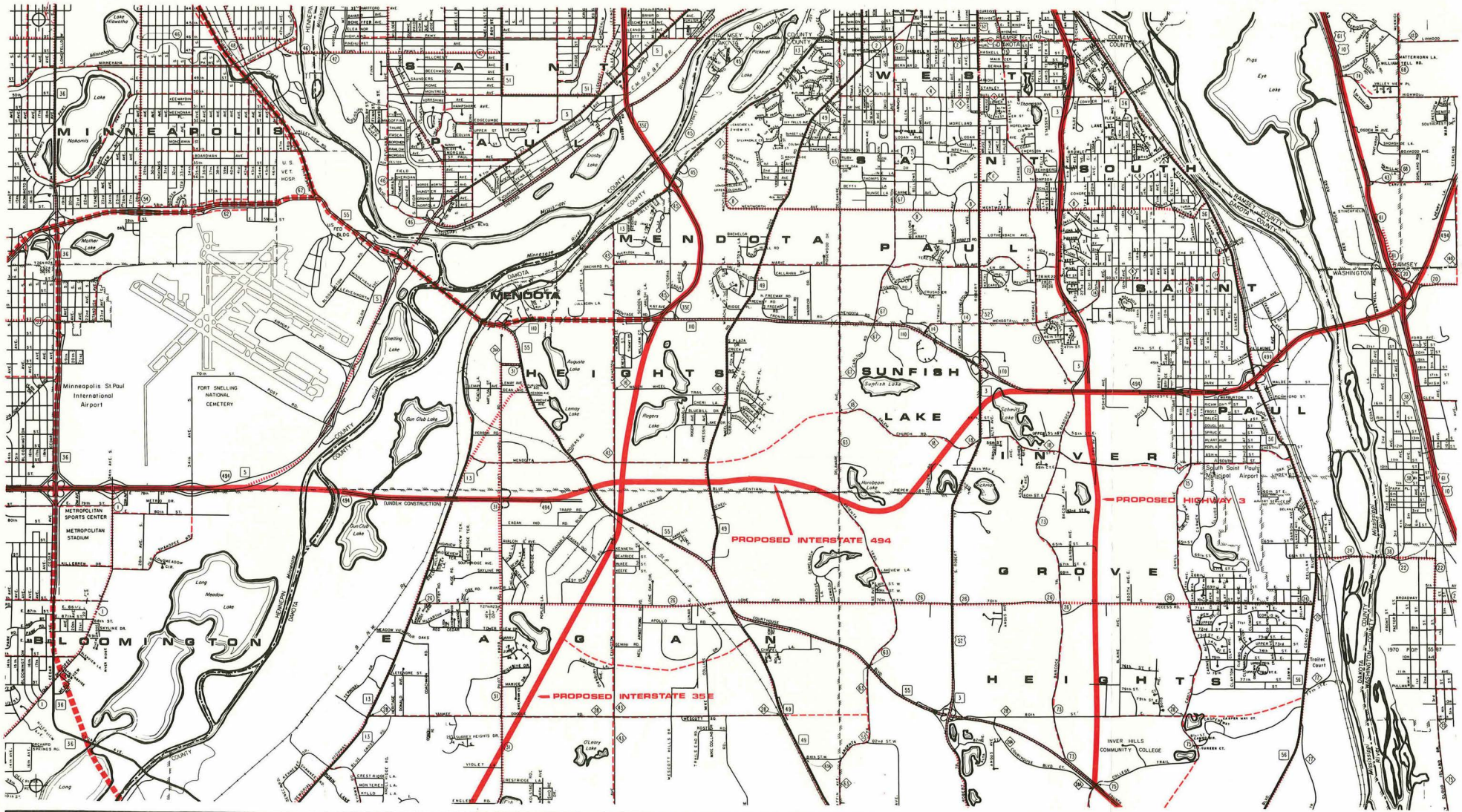
TRANSIT PLANS

In addition to the highway plans, the MC has also developed a 1990 Transit System Plan for the region that includes I-494. The Plan shows express transit in mixed traffic for downtown service on Proposed I-494 from TH 61 (just east of the Mississippi River Bridge in Newport) to TH 3. It also shows transfer points at the junction of proposed Interstates 494 and 35E. The Metropolitan Transit Commission, the other agency responsible for transit planning in the region, has suggested the use of metered freeway ramps with exclusive lanes for buses.[12] Thus, it appears that buses in mixed traffic will most likely be the mode of transit used on I-494, at least in the near future.

* Taken from recommendations on the uncompleted interstate segments in the Twin Cities Metropolitan Area, Metropolitan Council, St Paul, Mn, Jan 1976, p 48.

[11] This design was similar to Alternate B3.

[12] Included in a letter from Doug Kelm, Chairman, Metropolitan Transit Commission to the Interstate Study Committee, September 5, 1975.



SOURCE: Metropolitan Functional Classification Plan (map) Approved By The Transportation Advisory Board on 1-21-76

FIGURE 1-3

HISTORY, DEVELOPMENT, AND CURRENT STATUS

LOCATION HEARINGS

Public Hearings on December 13, 1956, August 12, 1958, November 4, 1963, and December 3, 1970, established basic roadway locations for this segment of I-494. On September 28, 1959, and December 18, 1963, the Bureau of Public Roads, now known as the Federal Highway Administration (FHWA), approved the location of the corridor. A combined Location and Design Hearing was held on August 25, 1977.

JOINT PLANNING

After the earlier hearings, the Division of Highways (DH) and other state and local agencies began making decisions relating to the proposed highway. Back in the early 1960's, when the DH was considering acquiring land in the Minnesota River Valley for the proposed I-494 crossing, the Department of Conservation[13] (DOC) wanted additional land in the Minnesota River Valley in the vicinity of the proposed I-494 crossing for Fort Snelling State Park. Part of the property which the DOC wanted could only be obtained through condemnation proceedings. The DOC (along with the Minnesota Department of Administration) entered into an agreement with the DH to jointly acquire 465 acres, with the DH exercising its power of eminent domain.[14]

Of the 465 acres acquired, the DH retained ownership of 16 acres, the amount needed for the I-494 crossing through the river valley. The DH transferred the remaining 449 acres to the DOC (with reimbursement from the DOC). This acreage is now part of Fort Snelling State Park.

During this period, the DH began acquiring right-of-way in Eagan, Mendota Heights, and Inver Grove Heights. About 412 acres were acquired at a cost of nearly 5 million dollars. When new federal environmental laws necessitated a delay in completing the acquisitions, the cities reserved the corridor through special zoning. Figure 6-2, p 77, shows the R/W acquired for I-494 thus far plus other R/W under DH ownership through previous highway construction (west of the Minnesota River near the Airport and east in the project area in Inver Grove Heights and So St Paul).

[13] Now the Department of Natural Resources

[14] The right of a government to take, or to authorize the taking of, private property for public use, with just compensation being given to the owner.

PROBLEMS AND OBJECTIONS

On September 20, 1973, the Minnesota Public Interest Research Group (MPIRG), a quasi-public organization, announced that it was suing the Federal Highway Administration and the DH in an attempt to prevent construction of I-494. Joining MPIRG in the suit were the Dakota County Environmental Protective Association and the Convent and Academy of the Visitation (in Mendota Heights).

Basic points of contention in the suit were as follows —

— that all but one of the Contracts for I-494 through Hennepin and Dakota Counties have been awarded.

— that the DH was planning to let the one remaining contract.

— that, in general, the building of another highway in the Twin Cities was inappropriate.

The outcome of the suit was a court stipulation which stated that, with the exception of the two contracts in force west of Pilot Knob Road and the work necessary for the preparation of an EIS, the DH would not engage in any activity which would further the development or construction of the project.[15]

CURRENT STATUS

The DH has completed some work on proposed I-494. The Federal Highway Administration (FHWA) had given location and design approval (and later approved an environmental assessment) on the section of I-494 from the Minnesota River to the Chicago, Milwaukee, St Paul, and Pacific Railroad (CMSTPP). In 1971, the DH awarded contracts for this section. Work included the placing of a sand blanket in the flood plain and the grading and preparation of a roadbed from the east bank of the Minnesota River to just west of the proposed I-494 and I-35E interchange. This work was completed in 1973. Contracts cannot be awarded on the remainder of proposed I-494 until after the necessary additional hearings, reports, and approvals. Construction on I-494 and the other highways in the proposal could start in 1979. The work could be completed in 1983.

[15] The Division of Highways, acting in accord with federal regulations, was already fulfilling the requirements of this stipulation.

THE PROPOSED ACTION

Location

Description

INTRODUCTION

This Section discusses Alt B3 — the Selected Alternate — and the reconstruction proposed for other highways in conjunction with proposed I-494. It was selected as the Build-Alternate because it removes 187 less acres of undeveloped land than B1 and B2 and impacts 21 less acres of wetland. Also — based on new and lower traffic projections — the lesser design of B3 is adequate for this section of the I-494 and I-694 belt-line route. Another reason for selecting B3 was that it is agreeable to the MC.

LOCATION

The project area is south of St Paul and Minneapolis, in Dakota and Hennepin Counties. Between the termini in Bloomington and So St Paul, the proposed route passes through the Minnesota River Valley and the cities of Eagan, Mendota Heights, Sunfish Lake, and Inver Grove Heights.

Dakota and Hennepin Counties are part of the 7-county metropolitan (metro) region of St Paul and Minneapolis, Minnesota (See Fig 1-1, p 3) Ramsey and Hennepin Counties, the locations of St Paul and Minneapolis (Twin Cities), form the core of the 7-county metro region. Clustered around these are the five remaining counties — Anoka, Carver, Dakota, Scott, and Washington. The seven counties have a total land area of 1,899,520 acres. About 904,433 acres (47.2%) of this area is in urban use. Population of the 7-county metro region is 1,874,612 (1970 census).

DESCRIPTION

This proposal includes the following highway improvements:

New construction of about 10.2 miles of I-494

Reconstruction of 1.3 miles of Inplace I-494 in So St Paul

Reconstruction of about 1.8 miles of TH 55, 3.5 miles of TH 49, and 1.3 miles of TH 5

NEW CONSTRUCTION

I-494

The section of I-494 proposed for new construction begins at 24th Av So in Bloomington and ends at 7th Av in So St Paul. It will be basically 6 lanes and will have a depressed median, rural design. Design speed will be 70 mph. The section of I-494 includes a 6-lane bridge over the Minnesota River, just under a mile long (4380 ft.), and major interchanges at proposed I-35E, TH's 5, 49, 110, 3 and Concord St. The design may include an additional local-access interchange between TH 49 and Delaware Av. The Metropolitan Council's new projections will determine this need.

RECONSTRUCTION

I-494 in So. St. Paul

The section of inplace I-494 in So St Paul proposed for reconstruction extends from 7th Av to the Mississippi River. This section of interstate highway has been in operation since 1962. Reconstruction here basically consists of widening the highway from the present 4 lanes to 6 lanes.

South St Paul plans to construct a new road east of Concord St. Called the Industrial Penetrator Road, the road will provide a direct connection between I-494 and the stockyards and a proposed grain terminal. Plans are to remove the existing interchange at Farwell Av and I-494 and construct an interchange at the site of the Industrial Penetrator Road. If this construction occurs before the reconstruction of Inplace I-494 (in So St Paul), the interchange will include provisions for the additional lanes along I-494 and for the necessary ramp connections.

(See discussion of additional highway work in So St Paul under Other Highway Construction).

Existing T.H.s 55, 49 and 5

TH's 55, 49, and 5 will also undergo reconstruction. This reconstruction work will coordinate the TH's with the proposed link of I-494 and with the other highway and street improvements proposed for the project area. Termini for these highways are as follows:

TH 55 — from about 0.5 miles north of proposed I-494 to the south junction of the TH's 49 and 55

TH 49 — from just north of Mendota Heights Rd. to the southeast junction of TH's 49 and 55

TH 5 — from proposed I-494 to about 1.3 miles north.

OTHER HIGHWAY CONSTRUCTION

The project area and nearby communities have been the focal point of a number of transportation studies and proposals for new and reconstructed highways. Aside from the construction proposed in this FEIS, highways under study or construction are as follows: The Mendota Bridge Intersection and TH 13, in Mendota Heights; TH 36 (Cedar Av), from Bloomington to Apple Valley (just south of Eagan); I-35E, in Eagan and Mendota Heights; and in So St Paul, Concord St (TH 56), an interchange at inplace I-494 at Concord St, and the mississippi River Bridge. (See Fig 2-1).

Mendota Bridge Intersection and TH 13

The basic problem at the Mendota Bridge Intersection is that three high-volume highways — TH's 13, 110, and 55 — all intersect in a relatively confined area on the same level. This intersection is at its theoretical capacity. The traffic flow is unstable and frequent stopping occurs. A signal light controls traffic at this intersection, and traffic back-ups are common during rush hours and periodically throughout the day.

The section of TH 13 south of the Mendota Bridge Intersection is also close to theoretical capacity. A 2-lane highway, it carries about 15,000 vehicles per day.

Currently, plans are to start reconstruction on the Mendota Bridge Intersection and TH 13 in 1980. The reconstruction will also include TH 55, from TH 110 to just north of the proposed I-35E and I-494 interchange. Although this work will have a definite relationship to proposed I-494 and must be correlated with it to an extent, it's a separate action, and all requirements will be met apart from this proposal.

I-35E

The Final EIS[1] for a section of I-35E from Burnsville (south west of Eagan) to TH 110 in Mendota Heights was circulated in August 1977. This section will have a major interchange with proposed I-494. Construction started in May 1978. Plans are to have another section of I-35E extend north from TH 110 into St Paul. Location for this section hasn't been determined.

TH 36

Trunk Highway 36 runs north and south, basically through Bloomington, Eagan, Burnsville, and Apple Valley. It interchanges with inplace I-494 in Bloomington, just west of 24th Av . The reconstruction of TH 36 began in December 1976 and should be completed around 1981. The highway will be upgraded from 2 to 6 lanes. Construction will include a new bridge over the Minnesota River. The Final EIS[2] for TH 36 was circulated in 1976.

TH 3

Trunk Highway 3 is located at the eastern part of the project area. It serves mainly as a connection between St Paul and Inver Grove Heights and the cities and farming communities in southeastern Minnesota (via TH 52). The section of TH 3 from St Paul to TH 110 was opened to traffic in 1976. Environmental studies are underway for the unconstructed section south of TH 110.

Concord St, Interchange at Concord St and I-494, and Mississippi River Bridge

The City of South St Paul is currently reconstructing a section of Concord St (TH 56), upgrading it from 2 lanes to 4. This section of highway extends north and south of inplace I-494. It passes through So St Paul's Central Business District and part of it's industrial area.

The interchange at Concord St and I-494 will be reconstructed, also under a separate proposal. The interchange will be designed to accommodate the current widening along Concord St and the future reconstruction of I-494.

Construction of a new bridge over the Mississippi River in So St Paul is also being considered. Currently, a 4-lane bridge carries I-494 traffic across the Mississippi River. Because of the limited capacity of this bridge and the amount of traffic that the new development proposed for the project area (including highways) will generate, plans are to construct a new 6-lane bridge at the I-494 crossing.

Tentatively, the construction of the Concord St and I-494 interchange is scheduled for early 1979. Construction of the Mississippi River Bridge will occur somewhat later.

[1] Report Number: FHWA-MN-EIS-76-04-F. Approval Date: 11 August 1977

[2] Report Number: FHWA-MN-EIS-74-4-F. Approval Date: 31 March 1976.

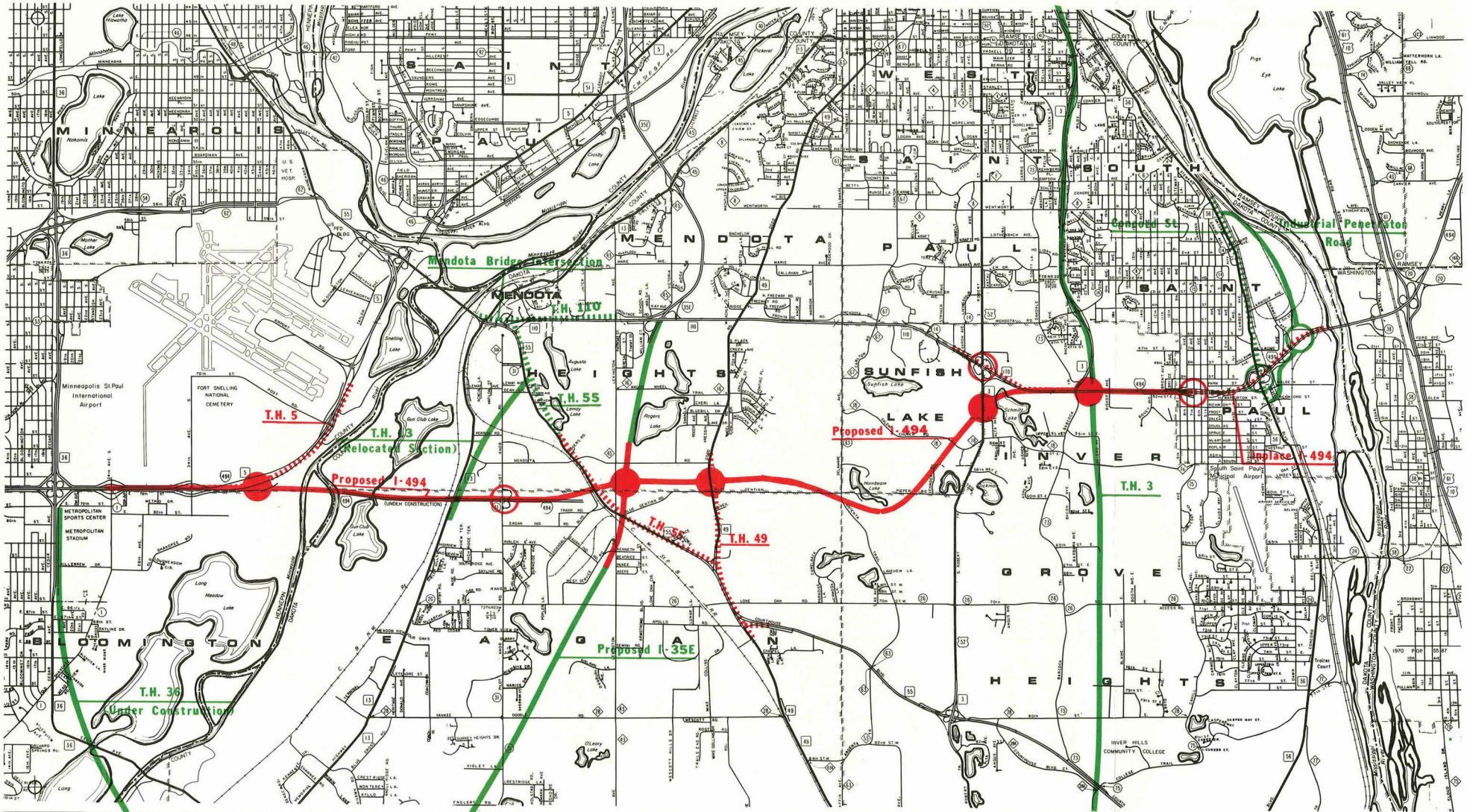

Mendota Bridge Intersection
T.H. 110
T.H. 5
T.H. 13
(Relocated Section)
Proposed I-494
(UNDER CONSTRUCTION)
T.H. 55
T.H. 55
T.H. 49
Proposed I-35E
T.H. 36
(Under Construction)
Proposed I-494
Replace I-494
T.H. 3
Concord St.
Industrial Penetration Road
Minneapolis St.Paul International Airport
FORT SNELLING NATIONAL CEMETERY
METROPOLITAN SPORTS CENTER
METROPOLITAN STADIUM
MINNEAPOLIS
SAINT PAUL
MENDOTA
MENDOTA HEIGHTS
SUNFISH LAKE
LILYDALE
SOUTH SAINT PAUL
INVER GROVE HEIGHTS
BLOOMINGTON
EAGAN
INVER HILLS COMMUNITY COLLEGE
South Saint Paul Municipal Airport
OTHER HIGHWAY CONSTRUCTION
NEW CONSTRUCTION
NEW INTERCHANGE
RECONSTRUCTION
RECONSTRUCTED INTERCHANGE
CONSTRUCTION RELATED TO PROPOSED I-494
PROPOSED HIGHWAY CONSTRUCTION
N
0
2000
4000
INTERSTATE
494

Figure 2-1

SOCIAL, ECONOMIC, AND ENVIRONMENTAL CONTEXT OF THE AREA

Natural Features

Social And Economic Setting

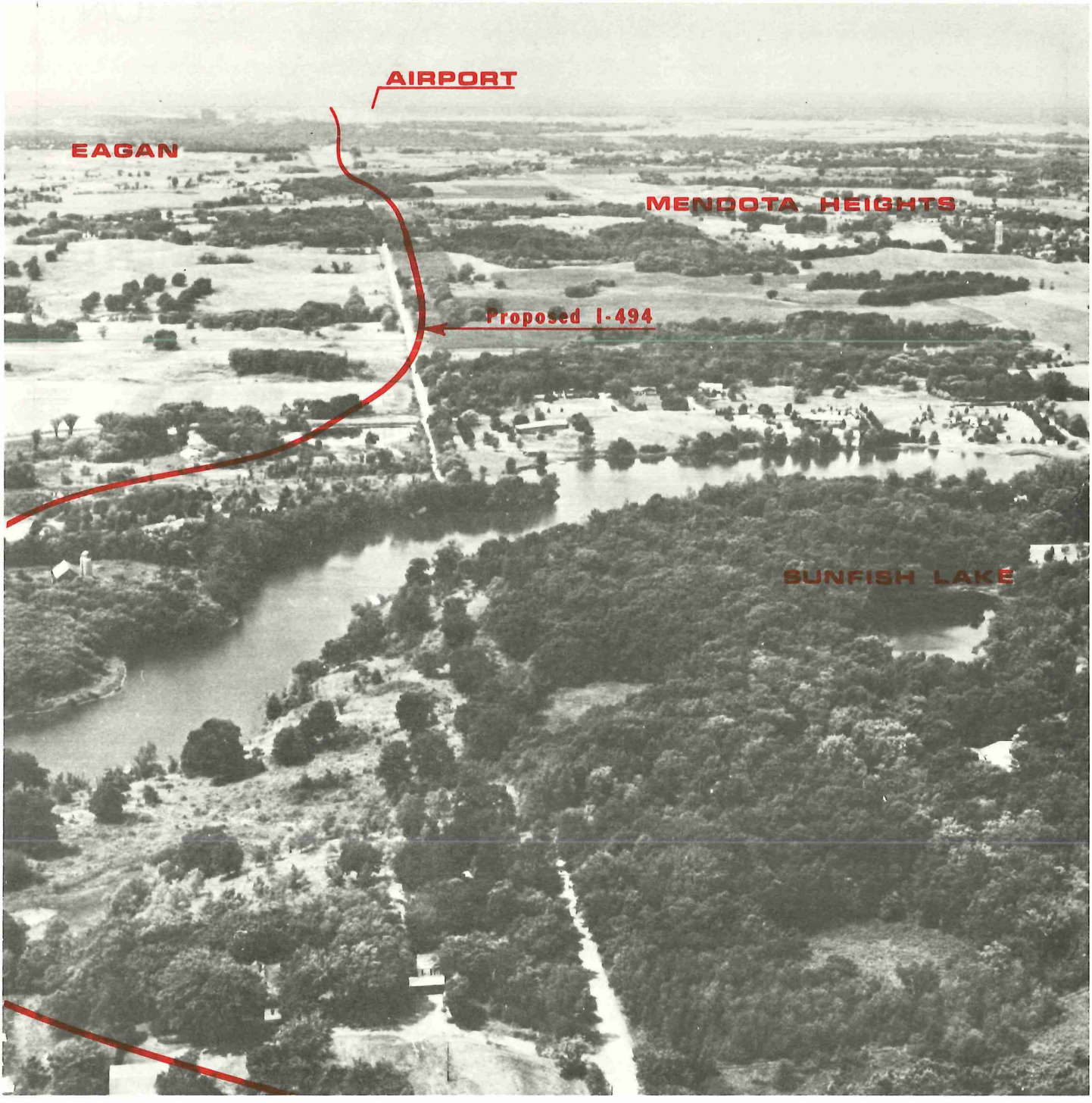


FIGURE 3-1 PORTION OF PROJECT AREA. Looking west from Hornbeam Lake in the city of Sunfish Lake. Line indicates approximate location of I-494

SECTION III THE SOCIAL, ECONOMIC AND ENVIRONMENTAL CONTEXT OF THE AREA

INTRODUCTION

The Project Area — lying entirely within the Metropolitan Urban Service Area — is undergoing rapid changes from rural to urban uses. With Bloomington and So St Paul, the change is largely history, having been accomplished for at least a decade or so. With the remaining project area cities and other cities in Dakota County, however, the change is still taking place. Thus far, the cities, although growing rapidly, have preserved the pleasing natural features of the area. Consequently, the interspersion of open space, modern residential areas, commercial centers, and industrial parks makes the project area unique.

Following in this section is a description of the project area. The divisions and sub-divisions are as follows:

NATURAL FEATURES

Climatological Data	Hydrology	Wetlands Wildlife
Geology	Vegetation	Fish Resources

SOCIAL AND ECONOMIC SETTING

Population, Housing, and Employment	Tax Base
Community Services	Recreational and Cultural Facilities

NATURAL FEATURES — CLIMATOLOGICAL DATA

The US Weather Bureau at the Mpls-St Paul International Airport is the official station for recording climatological conditions in the project area. Compiled data shows that the coldest month is January, with mean daily maximum and minimum temperatures of 22.4 and 2.3 degrees (°F). The warmest month is July, with mean daily maximum and minimum temperatures of 83.9 and 60.7 degrees.

The average annual precipitation in the project area is 24.78 inches. (Included in this figure is an average annual snowfall of 40.3 inches). June is the wettest month, with 4.00 inches of precipitation, and January the driest, with .70 inches. Nearly 64% of the average annual precipitation occurs from May to September.

GEOLOGY

TOPOGRAPHY AND SOILS

The topography in the project area varies from gently rolling in the west in Bloomington (Hennepin Co) to rugged and more pronounced in the east in northern Dakota County. Situated between the eastern and western sections is the broad expanse of the Minnesota River Valley, which on the average is about 1.5 mile wide through the project area. West and east of the river valley soils are mainly sand and gravel, with some clayey and silty soils, covered by a veneer of sandy loam. In the river valley, some areas are exclusively peat; others are silt and a mixture of peaty and sandy loam.

The geologic profile (Fig. 3-2) depicts the general relationship of the proposed grade to the soil bedrock, and ground water. The profile begins at 24th Av in Bloomington and terminates at 7th Av in So St Paul.

UNUSUAL FEATURES

With the exception of a rock quarry and gravel pit, the project area has no unusual geologic features. The rock quarry, located east of the Minnesota River in the floodplain, about 2500 ft. north of the proposed I-494 alignment, is not being worked at present. Years ago, however, several homes in the area were built with rock from the quarry. The gravel pit, located in the northeastern section of Sunfish Lake, fairly close to the proposed alignment, isn't being worked either. Most of the desirable material has been removed from the pit.

ERODIBLE SLOPES

The project area has only a few small strips of erodible slopes. Two small strips are in the flood plain east of the Minnesota River, one north and one south of Proposed I-494. Several other strips are inland in scattered locations. None are in the path of Proposed I-494, however.

HYDROLOGY

GROUNDWATER

The project area has two distinct ground water conditions: The Jordan-Prairie du Chien Potentiometric Surface and the Near Surface Water Table. The Jordan acquifier, the major source of water for the metro region, is in the Jordan sandstone, about 600 ft down. The Near Surface Water Table is the level at which water would be encountered in a shallow drill hole or well. Springs, lakes, and swamps in the project area generally are the surface expression of the Near Surface Water Table. Some limited zones of perched water, held up or ponded by impermeable soil, may occasionally be found above the water table, however.

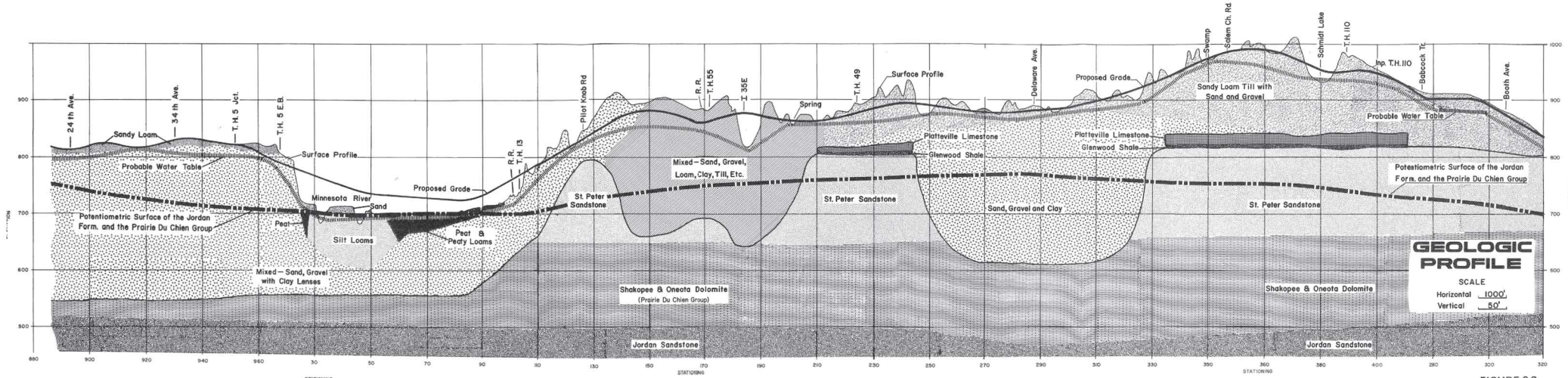

24 th Ave.
34 th Ave.
T. H. 5 Jct.
T. H. 5 E.B.
Sandy Loam
Probable Water Table
Surface Profile
Potentiometric Surface of the Jordan Form. and the Prairie Du Chien Group
Minnesota River
Sand
Peat
Silt Loams
Proposed Grade
Peat & Peaty Loams
Mixed – Sand, Gravel with Clay Lenses
R. R.
T. H. 13
Pilot Knob Rd
St. Peter Sandstone
Shakopee & Oneota Dolomite
(Prairie Du Chien Group)
Jordan Sandstone
R. R.
T. H. 55
I 35E
Mixed – Sand, Gravel, Loam, Clay, Till, Etc.
Spring
T. H. 49
Surface Profile
Platteville Limestone
Glenwood Shale
St. Peter Sandstone
Sand, Gravel and Clay
Shakopee & Oneota Dolomite
Jordan Sandstone
Delaware Ave.
Proposed Grade
Platteville Limestone
Glenwood Shale
St. Peter Sandstone
Swamp
Salem Ch. Rd.
Sandy Loam Till with Sand and Gravel
Schmidt Lake
T. H. 110
Inp. T.H. 110
Babcock Tr.
Booth Ave.
Probable Water Table
Potentiometric Surface of the Jordan Form. and the Prairie Du Chien Group
GEOLOGIC PROFILE
SCALE
Horizontal 1000'
Vertical 50'
ELEVATION
STATIONING
880
900
920
940
960
30
50
70
90
110
130
150
170
190
210
230
250
270
290
310
330
350
360
380
400
280
300
320
500
600
700
800
900
1000

FIGURE 3-2

WATERCOURSES AND WATERBODIES

The project area has two major watercourses and a number of water bodies. The watercourses are the Minnesota River, located in the west near Bloomington and Eagan, and the Mississippi River, located along the perimeter of the project area in the east, near So St Paul and Inver Grove Heights. Principal waterbodies in the project area are Lemay, Rogers, Hornbeam, Horseshoe, and Schmidt Lakes. In addition to these, the project area has a number of wetlands. Because of the lay of the land, little of the runoff in the project area reaches the two watercourses through direct surface runoff. Most of it goes into the lakes, ponds, and marshes.

GROUNDWATER RECHARGE AREAS

Groundwater recharge areas are mainly in the southern portion of Eagan, Inver Grove Heights, and Bloomington. A small recharge area does extend up into Mendota Heights. The remaining recharge area is in the floodplain.

VEGETATION

The existing vegetation in the project area consists of wooded land, grass areas in open fields, and grassy marsh areas. Grass areas and open fields are the most common, much of the land having been grazed or farmed at one time. Now — the agricultural use abandoned — the land has reverted to meadow or brush. The project area has a substantial amount of wooded land, most of which is in the southern portions of Eagan, Inver Grove Heights, and Bloomington. The southern edge of Mendota Heights and the southern section of Sunfish Lake also have fairly extensive woodland areas. Much of the marsh land in the project area is in the floodplain. However, many small marsh areas are located inland in northern Dakota County.

WETLANDS

The Proposed Corridor passes through two general areas of wetlands — the bottomland and upland wetlands. The environmental value of the wetlands is somewhat dependent upon their location.

BOTTOMLAND WETLANDS

The wetlands in the Minnesota River floodplain, the bottomland wetlands, are especially valuable. Near the I-494 crossing, the floodplain is about 1½ mile wide. The river is flanked on both sides by large flats of cattail and sedge marsh interspersed with open ponds and bottomland hardwood.

The floodplain supports a variety of plant wildlife and plant communities. Most notable of the plant communities are the "perched bogs" which contain orchids and other unusual plants. Only a few of the perched bogs are known to remain. One of these is north of I-494 near TH 13 in the vicinity of the proposed sedimentation pond. The DH, in consultation with the Minnesota Department of Natural Resources, selected a site for the pond which would not impact the bog area. Thus, proposed I-494 will not impact the plant communities.

Because these bottomlands are included in Fort Snelling State Park and the proposed Minnesota River Valley National Wildlife Refuge they also have recreational, scientific, and cultural values.

UPLAND WETLANDS

The wetlands in the upland areas east of the Minnesota River are not as valuable as those in the floodplain. These are smaller and occur in scattered, isolated pockets. They are not of major importance for recharging the deep aquifiers used for municipal water supplies. They may be important for maintaining the near-surface water table, however. Most of these wetlands are privately owned.

Between TH 49 and TH 52, the wetlands are especially numerous and occur in many sizes and types. For example, one square mile in this area contains 33 wetland basins. The wetlands are intermixed with farmland, grassland, and wooded areas.

WILDLIFE

While it is uncommon to find wildlife in predominantly urban areas, portions of the study area are prime wildlife habitat. The wetlands and the sizeable, well-vegetated open space and undeveloped land in the Minnesota River Valley and in areas of Eagan, Sunfish Lake, and Inver Grove Heights gives wildlife good protection from human activity. Within the immediate project area — the area contiguous to the corridor in the proposal — the Minnesota River Valley is the best wildlife habitat. In the river valley are deer and an abundance of small game, songbirds, and waterfowl. In the eastern portion of the study area — in northern Dakota County — urbanization has caused a shift in the wildlife population and only smaller animals, songbirds, and some waterfowl remain. No species of wildlife listed as threatened or endangered by the US Fish and Wildlife Service (Federal Register, Vol. 42, No. 135, July 1977) are known to reside within the project area.

INHABITANTS OF THE WETLANDS

The following list of mammals, amphibians, and reptiles are probable inhabitants of the wetlands that are proposed to be filled. They have been found in similar habitats in Hennepin and Dakota Counties.

Of these, only one species — the snapping turtle — appears in the "Special Publication No. 104" that lists species in need of special consideration. The snapping turtle is listed in the publication as a Species of Special Interest.

Mammals which depend on the wetland habitat in the project area:

1. Boreal red-backed vole
2. Meadow vole
3. Muskrat
4. Beaver
5. Masked shrew
6. Pygmy shrew
7. Short-tailed shrew
8. Cottontail rabbit
9. Red fox
10. Raccoon
11. Long-tailed weasel
12. Short-tailed weasel
13. Striped skunk
14. Spotted skunk

(Taken from Vegetation, Land Use and Wildlife Assessment, prepared by Office of Environmental Services, Division of Highways, June 1976).

Amphibians and reptiles which depend on the wetland habitat in the project area:

1. Leopard frog
2. American toad
3. Swamp tree frog
4. Green frog
5. Fox snake
6. Plains garter snake
7. Common garter snake
8. Snapping turtle
9. Painted turtle
10. Smooth green snake
11. Milk snake
12. Spring soft-shelled turtle

(Taken from Reptiles and Amphibians of Minnesota by W. J. Breckenridge, 1970 3rd printing, The University of Minnesota Press, Minneapolis.)

THE RIVER VALLEY

The river valley (floodplain) supports a variety of wildlife. The wetlands and mixture of vegetative covers and types, along with limited activity, makes it ideal habitat for waterfowl, small animals, and deer. Present in the valley are ducks, geese, egrets, herons, and terns. In addition to the small animals that inhabitat the wetlands in the floodplains, a herd of deer is resident in the valley year-round. Various estimates have set the number of deer in the herd at up to 500.

THE UPLAND WETLANDS

The interspersion of wetlands, farmlands, wooded areas, and grassland in the uplands provide a diversity of habitat for wildlife. Nesting game-birds such as pheasants, blue-winged teal, mallards, and wood ducks are common. Other wildlife in these areas include herons, grebes, blackbirds, hawks, songbirds, mink, muskrat, skunks, and raccoons.

FISH RESOURCE

Despite the number of water bodies in the project area, the combined fish population is small. The ponds and lakes in northern Dakota County lack the depth to winter fish. The Minnesota River has 24 species of fish in the section of the river valley near the proposed I-494 crossing, most species are present in low numbers. Carp is the prevalent species, accounting for about 42% of the total fish population. Others include gizzard shad (37%), sheepshead (6%), white bass (3%), northern redhorse (2%). Carp-sucker, sauger, northern pike, crappie, catfish and short-nose gar make up the remaining percentage.

SOCIAL AND ECONOMIC SETTING — POPULATION, HOUSING, EMPLOYMENT

POPULATION

From 1960 to 1970, the population of the 7-county Metro Area increased by 349,315, going from 1,525,297 to 1,874,612 (See Table 3-1). More than half of this increase occurred in the suburban areas. During this period, the population of Dakota County almost doubled, going from 78,303 to 139,808. (This was about 18% of the total increase in the metro region.) By 1972, the county had more than doubled its 1960 population, reaching 166,683. This high percentage of growth made Dakota County the fastest growing county in the State. Most of this growth occurred in the northern part of the county, in the project area and surrounding communities.

Projections indicate that this trend will continue (See Table 3-2). By the year 2000, Dakota County's population will be about 400,000, or around 13% of the Metro region total. The projections also indicate that, as in the past, the urban centers of the north will receive most of this growth. Again, this is because these cities have excellent land and are highly suitable for development, are close to St. Paul and Minneapolis, and are all within the area designated for growth.

Similarly, Bloomington (Hennepin Co.) has experienced rapid growth. From 1960 to 1970, Bloomington's population increased by 60%, going from about 50,000 to 80,000. Much of this growth can be attributed to the residential expansion that accompanied the build-up of industrial and commercial facilities along existing I-494, not only in Bloomington but in Edina, Richfield, at the Airport, and at Fort Snelling. Another reason for the growth is the proximity of Bloomington to Minneapolis. (Interstate 35W connects Bloomington to the central business district of Minneapolis.)

TABLE 3-1

AREA POPULATION, EMPLOYMENT AND HOUSEHOLDS

LOCATION	POPULATION		EMPLOYMENT		HOUSEHOLDS	
	1960	1970	1960	1970	1960	1970
Bloomington	50,498	81,970	7,789	43,955	12,035	21,816
Airport		624	7,870**	14,888		105**
Eagan	3,331	10,398	94	5,915	832	2,607
Mendota Heights	5,028	6,165	281**	1,254	1,260**	1,553
Sunfish Lake	181	269	1**	50	51**	67
Inver Grove Heights	6,466	12,148	531**	2,083	1,583**	2,837
South St. Paul	22,032	25,016	11,343	8,364	6,268	7,515
Minneapolis	482,867	434,400	274,190	290,324	165,791	161,080
St. Paul	313,413	309,866	172,756	186,759	98,698	104,095
Metropolitan Area	1,525,297	1,874,612	628,800	853,137	475,505	573,771

* Airport projections are for dwelling units

** Estimates

Source: Metropolitan Council

TABLE 3-2

AREA POPULATION, EMPLOYMENT AND HOUSEHOLD PROJECTIONS

LOCATION	POPULATION PROJECTIONS			EMPLOYMENT PROJECTIONS			HOUSEHOLD PROJECTIONS		
	1980	1990	2000	1980	1990	2000	1980	1990	2000
Bloomington	78,700	81,800	84,000	61,000	68,000	75,000	26,500	30,300	31,300
Eagan	20,400	36,000	46,500	14,000	19,000	24,000	7,050	13,350	17,250
Mendota Heights	7,800	9,000	11,000	2,500	4,500	6,500	2,200	3,000	3,700
Sunfish Lake	350	450	700	100	150	200	100	150	250
Inver Grove Heights	17,500	24,000	29,200	5,000	7,500	10,000	5,300	8,000	10,000
So. St. Paul	22,800	22,000	21,700	8,000	9,000	9,000	7,700	8,000	8,100
Minneapolis	375,000	375,000	380,000	280,000	280,000	285,000	164,000	171,500	174,000
St. Paul	277,000	270,000	275,000	185,000	185,000	185,000	109,400	112,000	114,000
Metropolitan Area	2,031,000	2,260,000	2,470,000	1,060,000	1,190,000	1,340,000	717,000	853,000	935,000

Source:
"Metropolitan Council News", April 27, 1977, approved 1977

Characteristics of Population

The median level of income and housing values is somewhat higher in the project area than in the rest of the region. Median income in the project area is $13,012 as compared to the metro region average of $11,682. The median value of homes in the project area is $24,247; the metro region average $21,500.

(The foregoing figures are from the 1970 Census of Population and Housing, US Dept of Commerce. A Metropolitan Council publication, titled "State of the Region: The Twin Cities Metropolitan Area," published in Feb. 1977, indicates that in the metro region the median family income and the median value of single family homes increased substantially since the 1970 census. From 1970 to 1975, the median family income increased by about 34.8%, the median value of single family homes by 38.5%. Thus, as of 1975, the median family income in the project area would have been about $17,550, the median value of homes about $33,582. The metro region averages would've had similar increases.)

The project area has only a small percentage of minority and foreign born. These aren't concentrated in any one area.

Table A-1, in the appendix, depicts the overall characteristics of project area residents and compares to them to the remainder of the metro region (1970 figures.)

Figure A-1, in the appendix, shows the locations of the data zones.

HOUSING

Housing starts in the metro region, like the population growth, have been higher in the suburban areas than in the core cities, Minneapolis and St Paul. Again, the areas with the greatest increase have been the 2nd and 3rd ring suburbs, areas which start about 6 miles from the core of the metro region and extend for another 8 to 9 miles. The cities in the project area are among these. With the exception of Sunfish Lake, all the cities in the project area will have a substantial increase in dwelling units. Sunfish Lake's comparatively small land area and large lot subdivisions will restrict its increase.

EMPLOYMENT

Employment growth in the project area has been commensurate with the population and dwelling unit growth. Thus far, the highest numerical increases have occurred in Bloomington, which increased by about 26,000 jobs in the ten years from 1960 to 1970. Eagan had the highest percentage increase, however, going from 94 to 5,915. By 1973, Eagan's total had climbed past 10,000.[1] Another area of high increase has been the airport, which went from 7,460 to 14,888. Projections indicate that by the year 2000, the combined employment in the project area will be about 9% of the metro region total. (Similar increases have occurred in and are projected for the surrounding communities, areas that are also dependent on I-494 as a transportation route, at least in part.)

[1] Dakota County In Perspective, Dakota County Planning Department, Hastings, Mn.

TAX BASE

Table 3-3, gives the assessor's estimated market value and assessed value of property in the different cities and school districts in the project area. (Proposed I-494 will affect these cities and districts in varying degrees. See discussion in Section VI, Direct Impacts, Right-of-Way, p 75).

TABLE 3-3

	SCHOOL DISTRICT*				
	6	196	197	199	271
ASSESSOR'S MARKET VALUE	$178,537,919	$310,417,509	$370,964,388	$130,066,855	$1,060,071,238
ASSESSED VALUATION	$62,704,182	$110,010,436	$138,580,569	$45,789,190	$397,769,266
% ASSESSED VALUATION IS OF ASSESSOR'S MARKET VALUE	35.12%	35.44%	37.36%	35.20%	37.52%
GOVERNMENT UNIT TAX RATE IN MILLS	72.51	AH 52.48 ANH 54.48 NA 64.48	AH 42.14 ANH 44.14 NA 54.14	AH 43.73 ANH 45.73 NA 55.73	54.014

	Bloomington	Eagan	Mendota Heights	Inver Grove Heights	Sunfish Lake	South St. Paul	Dakota County
ASSESSOR'S MARKET VALUE	$1,062,662,739	$217,190,930	$87,912,412	$144,952,899	$5,795,603	$179,628,549	$1,720,798,237
ASSESSED VALUATION	$404,379,612	$80,862,765	$32,000,467	$50,609,786	$2,170,859	$63,134,353	$618,383,873
% ASSESSED VALUATION IS OF ASSESSOR'S MARKET VALUE	38.05%	37.23%	36.40%	34.92%	37.46%	35.15%	35.94%
GOVERNMENT UNIT TAX RATE IN MILLS	14.418	196A** 86.75 196NA 96.75 197A 76.41 197NA 86.41 197AWD 76.92 197NAWD 86.92	197A 79.27 197NA 89.27 197A/WD 79.78 197NA/WD 89.78	196A 90.98 196NA 100.98 197A 80.64 197NA 90.64 197/196NA 89.92 199A 82.23 199NA 92.23	197A 72.73 197NA 82.73	199A 199NA 99.95 6 116.73 6/199 119.53	19.44

A - Agriculture
AH - Agricultural Homestead
ANH - Agricultural Non-Homestead
NA - Non-Agricultural
WD - Watershed District

REAL ESTATE TAX BASE
1975 (PAYABLE IN 1976)

* For location of School District, see Figure 3-3

COMMUNITY SERVICES

Figure 3-3, p 37 , shows the community services in the project area — police and fire departments, churches, schools, community centers, libraries, hospitals, and shopping centers (Bloomington's police department and city hall are outside the project area). Except for Sunfish Lake, each city has its own police and fire department. Generally the city hall in each city functions as community centers. Only Bloomington and So St Paul have libraries. Residents of Mendota Heights, Eagan, Sunfish Lake and Inver Grove Heights either use the county's library in Burnsville (south of Eagan) or receive services from the county's mobile unit. So St Paul is the only city in the project area with hospital services. The remaining cities depend on Minneapolis, St Paul, Edina or So St Paul for hospital services. Eagan plans to have medical facilities sometime in the near future (See Section IV, Land Use Planning, p 44).

RECREATIONAL AND CULTURAL FACILITIES

EXISTING

The project area contains two major recreational and cultural facilities — Fort Snelling State Park and the Metro Sports Complex. These are important not only to the immediate area but to the metro region, the State, and, to an extent, the nearby cities in adjacent states.

Fort Snelling State Park

Fort Snelling State Park encompasses about 2500 acres (Fig. 3-4 p40). It extends from the confluence of the Minnesota and Mississippi Rivers to about one mile south of the proposed I-494 bridge over the Minnesota River, an overall distance of about 4.7 miles. The park serves a number of conservational and recreational uses. Also, the major portions of the Fort Snelling and Mendota Historic Districts are within the park.

The park's location in the picturesque Minnesota River Valley enhances its conservational and recreational uses. The heavy vegetation, the marsh areas, and the several lakes make it an ideal wildlife habitat. Accordingly, the Minnesota Department of Natural Resources (DNR) has designated two areas within the park as wildlife sanctuaries. For recreational uses, the park contains an extensive trail system, a swimming area (Snelling Lake), and a large picnic area.

Both the Fort Snelling and Mendota Historic Districts have a number of sites important to Minnesota's History. Among the principal points of interest are old Fort Snelling and the Home of Henry Sibley, Minnesota's first governor (Mendota Historic District).

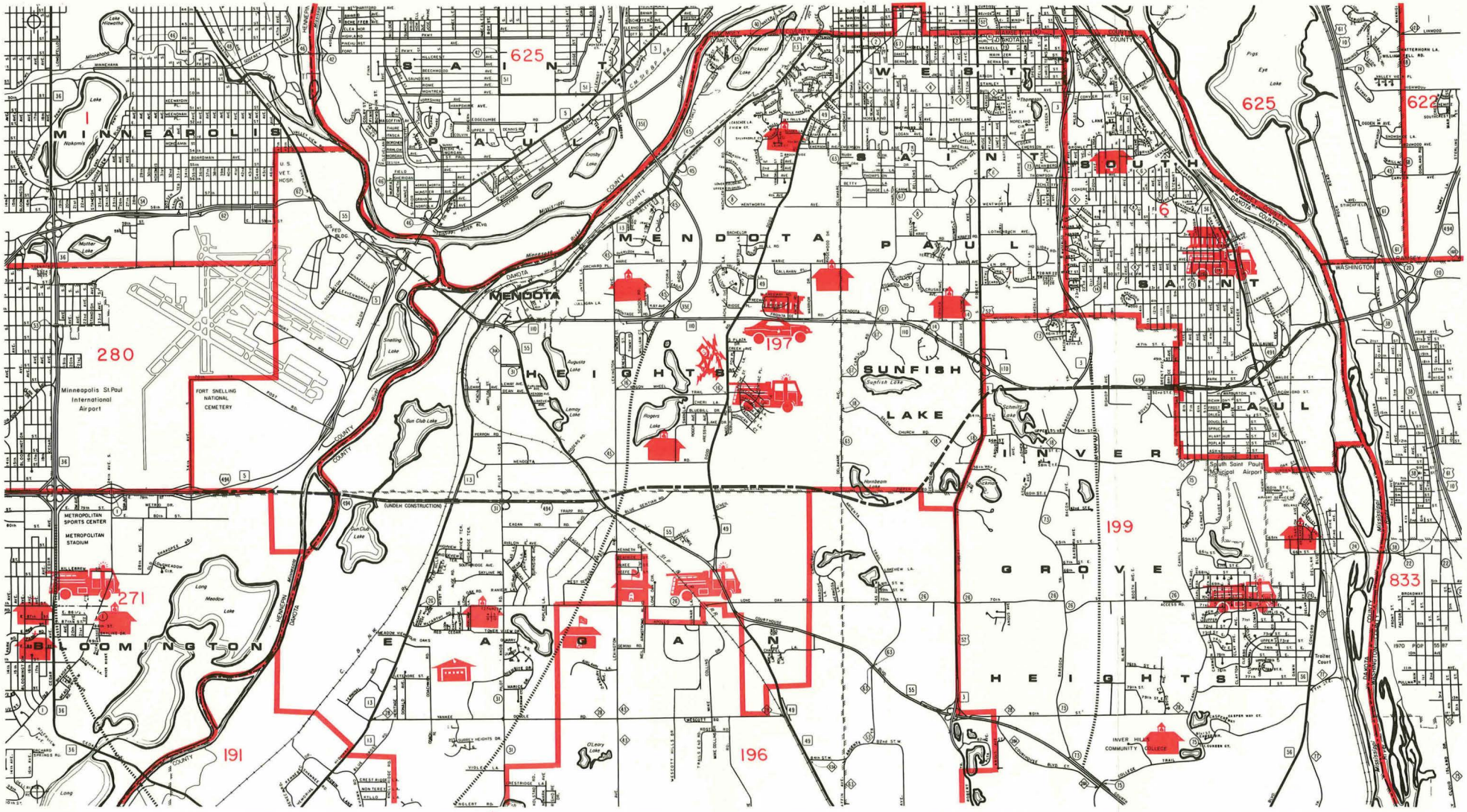

MINNEAPOLIS
SAINT PAUL
WEST SAINT PAUL
SOUTH SAINT PAUL
MENDOTA
MENDOTA HEIGHTS
SUNFISH LAKE
INVER GROVE HEIGHTS
BLOOMINGTON
EAGAN
625
280
197
199
833
271
191
196
494
Minneapolis St.Paul International Airport
FORT SNELLING NATIONAL CEMETERY
METROPOLITAN SPORTS CENTER
METROPOLITAN STADIUM
South Saint Paul Municipal Airport
INVER HILLS COMMUNITY COLLEGE
(UNDER CONSTRUCTION)
POLICE DEPARTMENT
HOSPITAL
POST OFFICE
CITY HALL
SCHOOL
CHURCH
FIRE STATION
PUBLIC WORKS
CITY GARAGE
COMMUNITY SERVICES
AND
SCHOOL DISTRICTS
N
0
2000
4000
INTERSTATE
494

FIGURE 3-3

Metro Sports Complex

The Metro Sports Complex is the scene of professional sporting events the year round. The complex consists of a stadium and an arena. Home of the Minnesota Vikings, Twins, Kicks and North Stars, the complex also hosts other events such as basketball, tennis, circus and ice shows. One of the most important highways leading to the complex is the I-494 beltline route. No other major east-west highways lead to the area.

PROPOSED

Two facilities — One, the Minnesota Valley National Wildlife Refuge, and the second, the Minnesota Zoological Gardens — will be important to the region, state, and possible the nearby cities in the surrounding states. The wildlife refuge, designated in 1976, could consist of about 6,600 acres, located in 4 units. The first unit would be just south of the proposed I-494 crossing through the river valley (The other three would be farther southwest). Preserved for its wildlife and aesthetic resources, the refuge would be for educational, recreational, and conservational purposes.

The Zoological Garden, located just south of Eagan will total about 460 acres. Designed for year-round use, the Zoo opened in May 1978. It will be the largest facility of its kind in the upper midwest. A 700-acre park will adjoin the zoo on the north and east.

MISSISSIPPI RIVER CORRIDOR CRITICAL AREA

In 1976, the Governor of Minnesota, through executive order, designated the Mississippi River Corridor a Critical Area. Development within the corridor must take place in an environmentally sensitive manner and be consistent with certain predetermined uses. The Minnesota Environmental Quality Board (MEQB) is responsible for administering interim development regulations until the individual communities have approved the Mississippi River Corridor plans.

Two sections of proposed I-494 fall within the critical area: The section that extends through the flood plain adjoining the Minnesota River, and the section that extends from Concord St to the Mississippi River Bridge in So St Paul The project appears to be consistent with the interim development regulations that pertain to an urban open space (near the Minnesota River) and urban diversified district (in So St Paul). The MEQB, in their response to the DEIS, agreed with this conclusion.

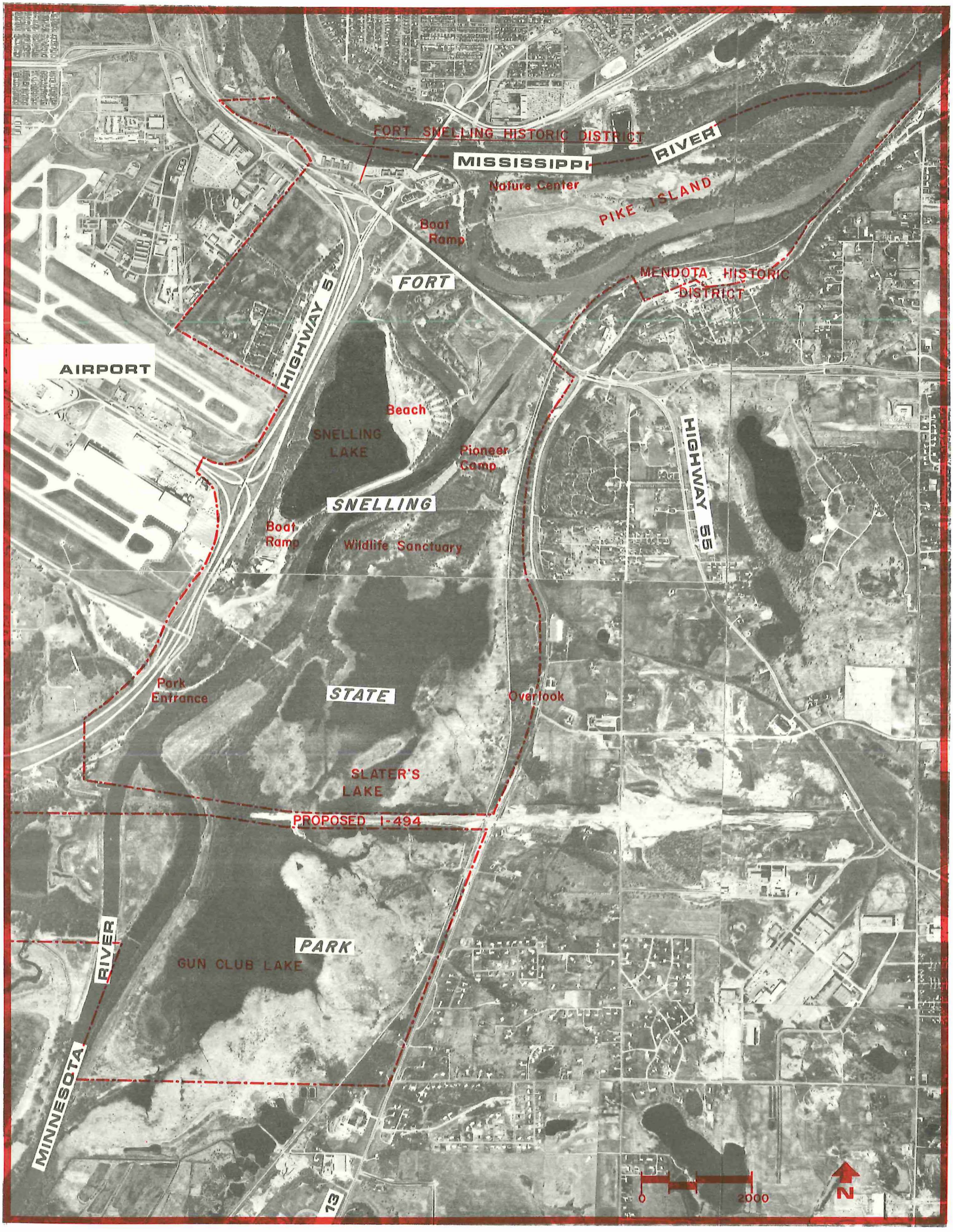

FORT SNELLING HISTORIC DISTRICT
MISSISSIPPI RIVER
Nature Center
PIKE ISLAND
Boat Ramp
MENDOTA HISTORIC DISTRICT
FORT
HIGHWAY 5
AIRPORT
Beach
SNELLING LAKE
Pioneer Camp
HIGHWAY 55
SNELLING
Boat Ramp
Wildlife Sanctuary
Park Entrance
STATE
Overlook
SLATER'S LAKE
PROPOSED I-494
PARK
GUN CLUB LAKE
MINNESOTA RIVER
13
0
2000
N

FIGURE 3-4

LAND USE PLANNING

INTRODUCTION

REGIONAL COMPREHENSIVE PLANNING

The Metropolitan Council (MC) is responsible for the control of growth on the metropolitan level. In an effort to guide the local units of government on decisions affecting metropolitan systems and regional development, the MC has prepared a development guide. Called the Metropolitan Council Development Guide, it deals with most all aspects of development and related problems — sewers, transportation, open space and parks, criminal studies, housing, development framework, and others.

DEVELOPMENT FRAMEWORK CHAPTER

The chapter on Development Framework defines the concept of Metropolitan Urban Service Area (MUSA). The MUSA line (Fig 6-1, p 73) outlines that portion of the Metropolitan Area in which government agencies should support urban development and/or redevelopment. The Metropolitan Council's long-range planning indicates that expansion of the Urban Service Limit should involve the following areas:

Existing Urban Service Area — this portion of the Metropolitan Area has metropolitan sewer service available, has good highway access, transit service, and most municipal services. Development and redevelopment in the well-serviced areas are of high priority.

Additions to the Urban Service Area, 1975-1980 — these areas are planned to receive metropolitan system improvements, particularly transportation and sewer service, during the latter half of the decade.

Additions to the Urban Service Area, 1980-1990 — these areas are contiguous to the built-up area and are the next logical place for urban development to take place. They will require investment in metropolitan sewer and transit service and highway facilities as well as substantial investments in municipal and school district facilities and services.

Freestanding Growth Centers — these are small cities that have been designated as growth centers so that metropolitan investments can be concentrated in a limited number of rural centers. These small cities can absorb urban growth and offer an alternative to living in large cities, suburbs, or scattered housing tracts in rural areas.

Proposed I-494

The I-494 project area lies well within the MUSA line. Of those areas close to the central business districts of Minneapolis and St. Paul, the project area is one of the least developed. Many developers cite the inadequate transportation system as a major reason for the slow growth. Proposed I-494 is one of several highway projects in the area designed to help improve the transportation system (see Other Highway Construction , p 19). The MC has endorsed the completion of I-494 as being consistent with comprehensive planning in the Metropolitan area.

Proposed I-494 is a feature of the land use plans of all the cities in the project area. One of the oldest plans — Mendota Height's — dates back to 1959. All the plans show I-494 in the same corridor as in this proposal. The cities indicate a definite correlation between their development plans and proposed I-494 (as well as the remainder of the highways in the Functional Classification System: see p 11), indicating varying degrees of dependence on the highway. Dakota County also shows proposed I-494 in both its comprehensive and thoroughfare plans.

RECENT LAND USE LEGISLATION

LAND PLANNING ACT OF 1974

In 1974, the Minnesota Legislature passed a land-planning act that gave the MC some new authority over development in the Metropolitan area. Called the Land Planning Act of 1974, it requires each municipality to comply with the MC's guideline for development, open space, parks, sewers, and transportation (including airports and highways). Under the terms of the law, the MC had until 1 July 1977 to prepare, adopt, and transmit the plans to the local units of government. These have until 1980 to update existing land use plans or prepare new ones.

The Land Planning Act requires each municipality in the seven-county area to designate in its land use plan the existing and proposed location, intensity and extent of use of land and water for agricultural, residential, commercial, and other public and private uses. In addition, there must be a housing element that contains standards, plans, and programs to meet existing and projected local and regional housing needs. The housing element must include official controls and planning to promote the availability of land for the development of low and moderate income housing. Some of the project area municipalities, such as Mendota Heights, are currently in the process of updating their comprehensive land use planning maps.

EXISTING AND PROPOSED LAND USE

EXISTING LAND USE

The predominant land use along the proposed Interstate 494 route through the project area is industrial and to a lesser extent commercial (Fig 4-1). The exception to this is in Sunfish Lake, which is residential throughout. The largest industrial areas are in Bloomington, Eagan, and South St. Paul. By comparison, Mendota Heights and Inver Grove Heights have only a small amount of industrial development at present. The individual industries in Mendota Heights are fairly large, however.

Bloomington

East Bloomington is principally an industrial and business area, consisting of a number of office parks. The concentration of companies here makes this the third largest business district in the region, behind the CBD's of Minneapolis and St. Paul. In this area also is the Metropolitan Stadium and the Metropolitan Sport Center, hosts to professional teams from most all the major league sports. Surrounding the sports complex are numerous commercial establishments — hotels, motels, eating and drinking establishments. Just north and east of the complex, adjoining a section of proposed Interstate 494 and Trunk Highway 5, is the Minneapolis-St. Paul International Airport — Wold Chamberlain field — the largest airport in the upper midwest. The 3,000-acre airport employs about 16,000 people.

Airport

Eagan

Eagan has a large industrial park in the northern section of the city, near the proposed Interstate 494 and Interstate 35E interchange. This industrial park has about 47 major companies. Most of the park's growth occurred from 1966 to 1970, during which time it expanded from 460 acres to 1240. South in Eagan, near Trunk Highway 13 and Cedar Avenue is another industrial area. Most of Eagan's commercial facilities are in this area also.

South St Paul

Most of the industrial and commercial development in So St Paul is located along Concord Street, a north-south street that interchanges within the section of inplace Interstate 494 proposed for reconstruction just west of the river crossing. Several major industries are located here, including the stockyards, and its associated industries. The stockyards, largest in the upper midwest, is the terminal market point for 20 states, handling about 3,000,000 head of livestock annually.

PROPOSED LAND USE

Bloomington

Figure 4-2 is a composite of the proposed land use plans of the cities in the project area. Several of the cities show increased industrial and commercial development. Bloomington's eastern area, that portion of the city in the vicinity of proposed I-494, will experience only moderate growth. This will occur in an area of undeveloped land just south of proposed I-494 and east of the sports complex. Zoned industrial, the land is the planned site for Apple Tree Square, an office complex. Construction of the complex is presently underway. When complete, the complex will have office space, commercial facilities, and residential units.

Airport

The Metropolitan Airports Commission plans major expansion of their present handling capacity at the Minneapolis-St. Paul International Airport. An important element of the planned expansion is completion of area freeways including I-494 and its interchange with TH 5. Projections indicate that the expansion will result in about 100,000 cars at the airport daily. (In 1974, daily activities resulted in 29,080 cars daily.)*

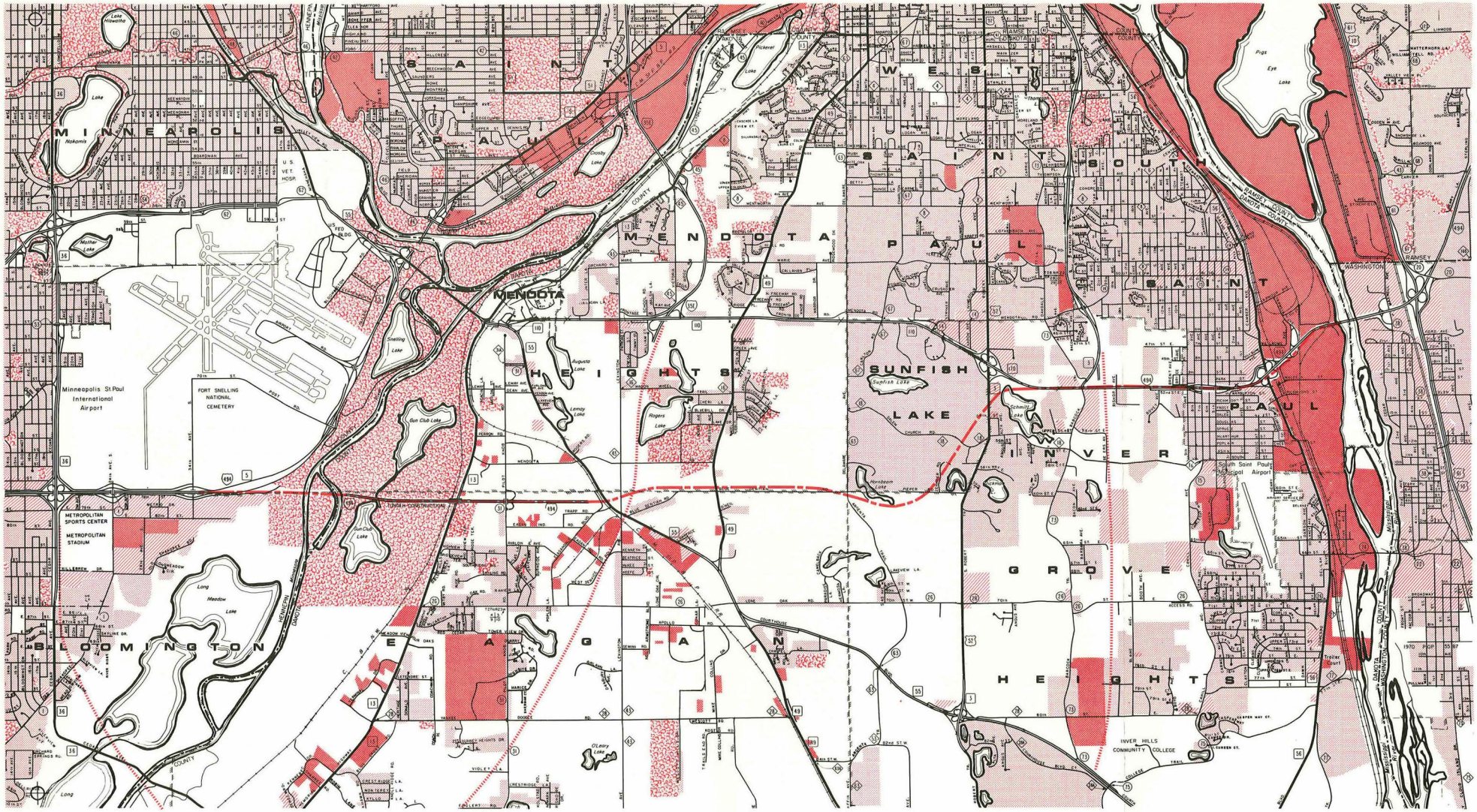
Eagan

Eagan's proposed land use plan includes the major diversified center and the industrial park near the proposed I-494 and I-35E interchange. The diversified center will have a variety of stores and offices and medical, institutional and recreational facilities. Also, the center might have residential units. Eagan's proposed land-use plan also allows full development of the Eagandale industrial park, located in the vicinity of the proposed diversified center. Presently, 1240 of the 2700 acres are developed.

South St. Paul
Mendota Heights
Inver Grove Heights
Sunfish Lake

South St. Paul is a well established city and is near the saturation point in its development. It does plan significant changes in its commercial district along Concord Street a north-south street which interchanges with inplace I-494. Also, it plans extensive redevelopment in the industrial area near inplace I-494. Most of the development in Inver Grove Heights and Mendota Heights will continue to be residential although both cities plan limited industrial expansion. Most of Mendota Heights' industrial expansion will occur just north of proposed I-494 near County Road 31 (Pilot Knob Road). Sunfish Lake's Land Use Plan calls for continued residential usage.

* From the Summary Report for Minneapolis-St Paul International Airport Master Plan Study, Minneapolis-St Paul Metropolitan Airports Commission, August 1976.



RESIDENTIAL
COMMERCIAL
INDUSTRIAL
OPEN SPACE

EXISTING LAND USE

N

0 2000 4000

INTERSTATE 494

FIGURE 4-1

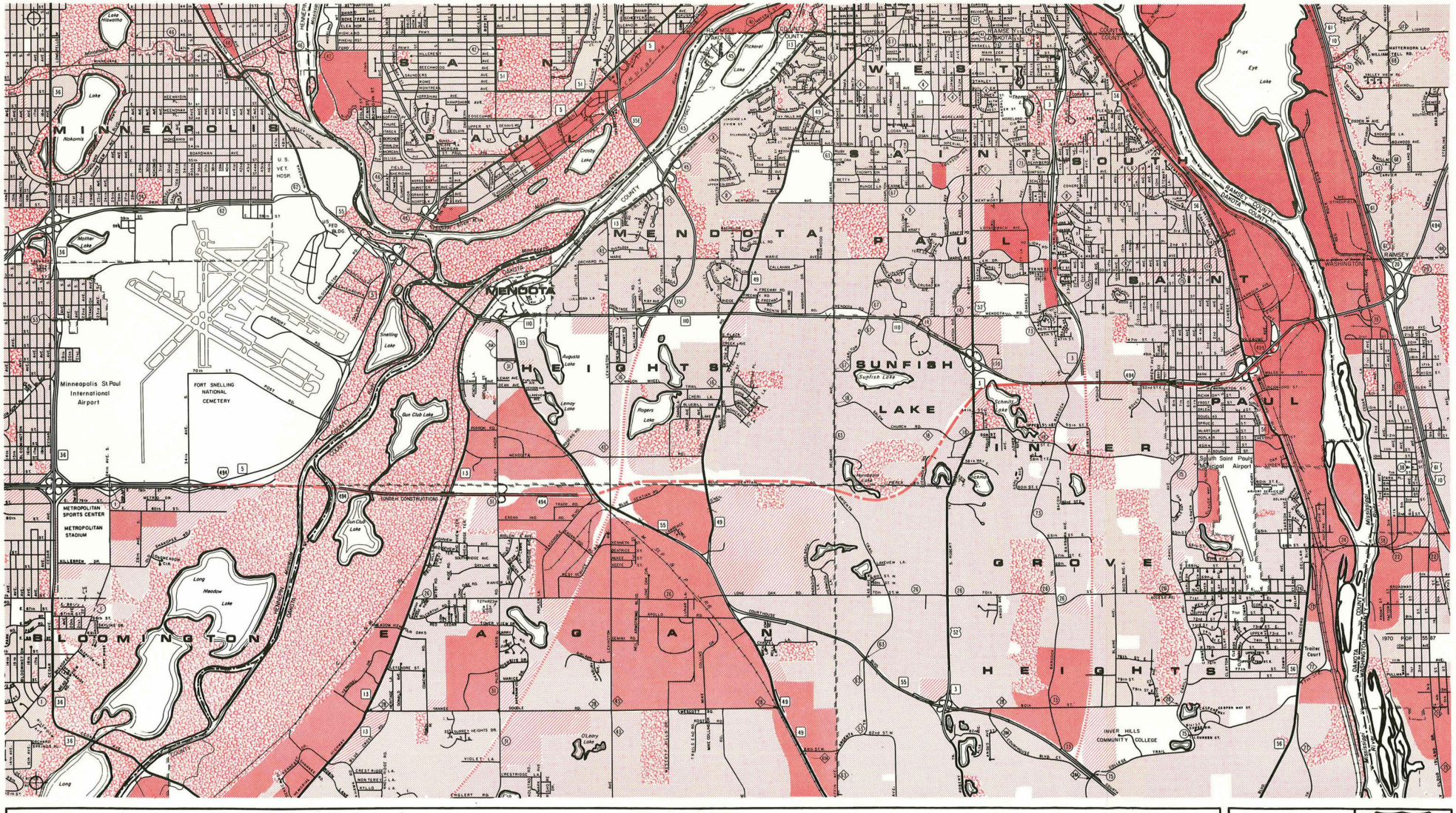

MINNEAPOLIS
SAINT PAUL
WEST SAINT PAUL
SOUTH SAINT PAUL
MENDOTA
MENDOTA HEIGHTS
SUNFISH LAKE
INVER GROVE HEIGHTS
EAGAN
BLOOMINGTON
Minneapolis St.Paul International Airport
FORT SNELLING NATIONAL CEMETERY
METROPOLITAN SPORTS CENTER
METROPOLITAN STADIUM
South Saint Paul Municipal Airport
INVER HILLS COMMUNITY COLLEGE
(UNDER CONSTRUCTION)
RESIDENTIAL
COMMERCIAL
INDUSTRIAL
OPEN SPACE
PROPOSED LAND USE
N
0
2000
4000
INTERSTATE
494

FIGURE 4-2

ALTERNATES

Introduction

Alternate A
(Historical Alternate)

The Selected Alternate
(Alternate B3)

Alternatives Considered
(Design Alternates B1 and B2
And The No-Build)

INTRODUCTION

A proposed corridor location for I-494 was first documented in 1955 as part of an Interstate Study which the Bureau of Public Roads[1] conducted. The study, titled "General Locations of National System of Interstate Highways," suggested locations for the interstates. (The suggestions were not intended to be binding on the states and communities and were merely general concepts.) In this study, proposed I-494 through the project area followed the corridor shown as A in Fig 5-1. Shortly after this study, a study which a consultant firm conducted for the Division of Highways (DH) placed the corridor in the location shown as B in Fig 5-1.[2] The public hearing of December 12, 1956, reviewed the latter location.

The DH presented corridors A and B and another corridor, C, at a public hearing on August 12, 1958 (See Fig 5-1). At the request of the local communities, the DH continued their studies through two more public hearings — on November 3, 1963, and December 3, 1970. From these, the DH developed the corridor location shown as the Preferred Corridor in Fig 5-1.

The alignment for the Preferred Corridor ran close to that of B and C, with some changes. One change was a shift in the alignment to avoid Hornbeam Lake in the City of Sunfish Lake; another was a shift to reduce the encroachment on Schmidt Lake in Inver Grove Heights. Also, the Preferred Corridor followed the boundary line between Mendota Heights and Eagan. From 24th Av in Bloomington to the vicinity of TH 55, the location remained the same as in the earlier corridor locations considered.

The communities and agencies involved were satisfied with these changes, and eventually all the communities approved the Preferred Corridor.[3] The DH proceeded to purchase R/W, and the communities developed their comprehensive plans based on this location for I-494.

In July, 1977, the Draft Environmental Impact Statement (DEIS) for the project was circulated. The DEIS discussed Alt A, the Historical Alternate, and three design alternates within the Preferred Corridor — Alt B1, B2 and B3. It also discussed the No-Build Alternate.

The general public, local municipalities, and appropriate agencies and organizations were given opportunities to review and comment on the DEIS. These opportunities included an informal open house and a location — design public hearing, both on August 25, 1977, in Mendota Heights. A 51-day comment-period — from the hearing to October 15, 1977 — allowed additional time for submitting written statements.

[1] Now Federal Highway Administration

[2] O. L. Kipp, "Interstate Route Location in St Paul and Minneapolis Metropolitan Area," (Consultant Report, 1956).

[3] Sunfish Lake, in a letter to the DH (September 29, 1972), withdrew its support of the Preferred Corridor, after having approved it at the December 3, 1970, public hearing.

CORRIDORS CONSIDERED

N

0 1000 2000

INTERSTATE 494

FIGURE 5-1

Comments received at the hearing and during the comment-period again indicated strong support for the Preferred Corridor (the B corridor). Of the 459 people, agencies and organizations expressing a preference, 425 favored the B corridor, 15 favored other corridors, and 19 preferred the No-Build Alternate (See Table A-2, p 211, Appendix). Also a large number of those responding indicated a preference for the B2 design. However, Alt B3 was selected as the Build-Alternate, for the reasons outlined in the discussion on the selected alternate in this section.

Following in this section is a discussion of Alt A and the Selected Alternate (B3), and a summary of the remaining alternatives considered in the DEIS — Alts B1, B2, and the No-Build.

ALTERNATE A (HISTORICAL ALTERNATE)

The DEIS discusses Alt A as a historical alternate because it was the first corridor location considered for I-494, and the possibilities of locating the proposed highway along this corridor has been discussed in meetings occasionally through the years.

From 24th Av in Bloomington to TH 55 in Eagan, Alt A follows the same corridor as the Preferred Corridor, (see Fig 5-1, p 51). Then, swinging north, it runs alongside proposed I-35E to TH 110. From the interchange of I-35E and TH 110, Alt A follows inplace TH 110 eastward to 7th Av in So St Paul, where reconstruction of inplace I-494 will begin.

The design for proposed I-494 within the Alt A corridor would include the bridge over the Minnesota River and interchanges at 24th Av, TH 5, CSAH[4] 31, proposed I-35E, and TH's 49, 52, 3, 56 (Concord St), and a proposed industrial road east of Concord St.

Alternate A had several advantages over the other alternates considered. These were as follows —

— Alt A required less new right-of-way. Total acres under Alt A would have been 700 as compared to 1594 under Alts B1 and B2 and 1406 under B3. This means that about 287 remaining acres would have had to be acquired under Alt A[5], under Alts B1 and B2, 679 remaining acres would have to be acquired; under Alt B3, about 494 acres.

— Alt A would have required less undeveloped land. The undeveloped land which the Preferred Corridor requires would be left in its natural state until some other form of development uses it. This would mean that the unused land would continue to provide vegetation, water and other resources for wildlife and human enjoyment. Also, with a large part of the Alt A corridor being on existing alignment (TH 110), the visual intrusion would not have been as great.

[4] County State Aid Highway

[5] 912 acres have been acquired (see Fig 6-2, p 77). 412 acres of this is along the western and eastern parts of the proposed route where Alts A, B1, B2, and B3 have a common location.

— Although Alt A would have taken 7 more commercial businesses and industries than the alternates in the Preferred Corridor, it would have taken 19 less residences and farmsteads than Alt B3, the Selected Alternate, and 26 less than Alts B1 and B2.

The disadvantages with Alt A were as follows —

— Alt A would create several negative economic impacts in Mendota Heights. Running I-494 adjacent to I-35E and along TH 110 through Mendota Heights would remove a large amount of the City's residential and commercial properties. In addition, land from one developed and one undeveloped city park would be required as well as land and an estimated six greens from the Mendakota Country Club.

— The section of Alt A along TH 110 would be counter to the comprehensive plans of Mendota Heights, West St Paul, and Sunfish Lake. TH 110 functions as a major thoroughfare for these communities, collecting local traffic from existing north-south routes. The local streets which Mendota Heights proposes will places an even heavier dependence on TH 110 as a local-access thoroughfare.

— Upgrading TH 110 in Mendota Heights to freeway standards would force the city to change its pattern of development. For one thing, the city would have to make some major changes in its existing and proposed street system and create new access routes. Also, a freeway along TH 110 would mean that all through traffic would remain on this route in addition to local traffic. From 10 to 12 lanes would be needed to accommodate the projected volumes.

— Traffic associated impacts would be much greater if TH 110 were to carry I-494 traffic because of the different functions the two routes serve. TH 110 carries short trips and provides local access (now 6.1 access points per mile). Upgraded to a freeway for I-494, it would have one access per mile and would carry longer trips at higher speeds. This change in function would be contrary to the Functional Classification Plan the Metro Council has developed (see FCP, p 11).

— Alt A would adversely affect the existing and proposed development in Eagan. This corridor wouldn't provide good access to the industrial parks of Eagan.

Because the disadvantages seem to outweigh the advantages, Alt A has been the least favored of the corridor locations considered through the years. Most all local and regional planning has centered around the Preferred Corridor. (At the 1972 Public Hearing, the counties and local communities were unanimous in their preference of the Preferred Corridor.)

Thus, because of the present development patterns, the planned land uses, and the strong historical commitment to the Preferred Corridor, Alternate A has been dismissed from further consideration.

THE SELECTED ALTERNATE (ALTERNATE B3)

REASONS FOR SELECTION

Alternate B3 — The Selected Alternate — is one of three design alternates within the Preferred Corridor that were considered in the DEIS and at the Public Hearing. The reasons for selecting Alt B3 as the build-alternate were as follows —

— It will have less of an impact on undeveloped land and wetland areas than Alts B1 and B2. Alternate B3 removes 185 less acreages of undeveloped land and impacts 21 less acres of wetland.

— It will take six less residences and one less farmstead than Alts B1 and B2.

— It's more consistent with the MC's "Functional Classification Plan," the transportation plan for the region, than either B1 or B2. Although the MC's plan places I-494 on the Preferred Corridor, it doesn't include the relocated section of TH 55 (as Alts B1 and B2 would have).

— It should help to slow growth in the areas southeast of the project area, outside, or on the fringe of, the Metropolitan Urban Service Area (MUSA).* Under Alts B1 and B2, the relocated section of TH 55 might have induced development in these areas.

— It's more consistent with future funding capabilities. Alt B3, costing about $80 million (1977 estimate), is about $20 million less than B1 and B2.

CONSTRUCTION PROPOSED

The details of the highway construction proposed under Alt B3 appear on pages 18 and 19 of Section II, the Proposed Action. Briefly, Alt B3 will include the following construction —

— About 10.2 miles of new construction for I-494 and 1.3 miles of reconstruction on Inplace I-494 in So St Paul.

— Reconstruction of sections of TH's 5 (near the Airport), 49, and 55. This reconstruction work will coordinate the TH's with proposed I-494 and other highway and street improvements in the project area.

FUNCTIONAL ASPECTS

Interstates 494 (and 35E) will provide high levels of mobility through the project area to all parts of the metropolitan region and beyond. They will not provide direct land access to the existing and planned industrial and commercial development in Eagan and Mendota Heights, however. A short stretch of TH 49 — and possibly an interchange near Delaware Av — will have to provide this access. Under Alt B1 and B2, a relocated section of TH 55 would have also provided access to this development (eliminating the need for an interchange near Delaware Av). This possibility is excluded under Alt B3, however, as it does not include the relocated section of TH 55.

Traffic movements from the interstates to inplace TH 55 and access to the development near the proposed I-494 and I-35E interchange will be via three indirect routes. Access points for two of these routes will be at Pilot Knob Road (from I-494) and at Lones Oak Road (from I-35E). The third route would be via a local-access interchange at TH 49, from I-494.

* Areas with, or designated to receive, public facilities: highway improvements, water, sewer, and other utilities.

SECT V ALTERNATES

The overall design of the project will be dependent upon the most recent MC population, employment, and Housing projections and the resultant traffic forecasts.* If the new forecasts indicate the need, the design might provide a fourth access point via a local-access interchange just west of Delaware Av. It might also include a shift in a short section of TH 49 to allow proper interchange spacing. Also, the B3 design will most likely result in a smaller interchange at the I-494 and I-35E crossing. This reduction will come as a result of not constructing the relocated section of TH 55 and not providing space for its future construction (see Discussion in B1 and B2). Local considerations and needs, as expressed in continual coordination with the municipalities in the project area, will also influence the design.

ALTERNATIVES CONSIDERED

The DEIS considered two other Design Alternates — B1 and B2 — and the No-Build. Like Alt B3, Alts B1 and B2 were within the Preferred Corridor, the B corridor. All alternates — including the No-Build — were given equal consideration, and B3 wasn't chosen until after evaluating the comments received on the DEIS and the Location-Design Public Hearing.

ALTERNATES B1 AND B2

The design of Alternates B1 and B2 have several similarities. These are as follows —

— Each alternate has a basic 6-lane construction of I-494.

— Each proposes the same improvements on inplace TH 55, TH's 5 and 49, and inplace I-494 in So St Paul.

— Each has the same limits of construction on proposed I-494, TH's 55 (inplace), 5, 49, and inplace I-494 in So St Paul. (Termini for this construction is the same as that proposed in the Selected Alternate, Alt B3. See pages 18 and 19 of Section 11, the Proposed Action.)

Basic differences between Alt B1 and B2 are as follows —

— Alt B1 includes a relocated section of TH 55. The inplace section of TH 55 would be improved for local access.

— Alt B2 is in essence a long term staging of Alt B1. Initially, I-494 would be constructed, along with the improvements on TH's 55 (inplace), 49, and 5, and inplace I-494 in So St Paul. The relocated section of TH 55 wouldn't be constructed initially, but the design of the I-35E and I-494 interchange would have provisions for its construction at later date, when growth in the project area required it. Also, the right-of-way necessary for its construction would be purchased.

* Figures that could be used to determine traffic forecasts did not become available until early 1978. Mn DOT is in the process of developing new traffic forecasts from the new projections.

ALTERNATE B3

N

0 1000 2000

INTERSTATE 494

FIGURE 5-2

MINNEAPOLIS - ST. PAUL INTERNATIONAL AIRPORT
MISSISSIPPI RIVER
FORT SNELLING STATE PARK
MINNEHAHA CREEK
INTERSTATE 494
PROPOSED INTERSTATE 494
HIGHWAY 5
HIGHWAY 13
PROPOSED INTERSTATE 35E
HIGHWAY 55
HIGHWAY 49
HIGHWAY 110
HIGHWAY 52
HIGHWAY 56
PROPOSED HIGHWAY 3
PROPOSED HIGHWAY 55
NEMDOTA HEIGHTS RD
BLUE GENTIAN RD
LEXINGTON RD.
DELAWARE AVE.
SALEM CHURCH RD.
CHORDALE AVE.
24th AVE.
70th ST. W.
YANKEE DOODLE RD.
PILOT KNOB RD
ARGENTA
ALTERNATE B1
INTERSTATE 494

FIGURE 5-3

ALTERNATE B2

N

0 1000 2000

INTERSTATE 494

FIGURE 5-4

Under Atl B1, entry from the interstates into the industrial parks or to the proposed major diversified center, in the vicinity of the proposed I-494 and I-35E interchange, would be via the relocated section of TH 55 to TH 49 and Lone Oak Road. (It would also include the indirect access points discussed in the section on Alt B2.) Movement between the interstates and inplace TH 55 would also be via the relocated section of TH 55 and TH 49. The relocated section of TH 55 would also provide access to the major traffic generators and a through traffic by-pass around the congestion caused by local traffic and multiple direct access points on existing TH 55.

Initially, Alt B2 — not having the relocated section of TH 55 — would provide only indirect access to the development near proposed I-494 and I-35E. This would be via access points at Pilot Knob Road (from I-494), Lone Oak Road (from I-35E), and TH 49 (from I-494). Once upgraded Alt B2 would provide the same access as Alt B1.

THE NO-BUILD

Adopting the No-Build Alternate would mean not constructing the proposed section of I-494. This does not mean that other proposed highway improvements would not be made in the vicinity. Also, minor safety and capacity improvements might be made to existing highways such as TH 110. These could include (but would not be limited to) the addition of turning lanes, traffic signals, frontage roads, new surfaces and improved shoulders.

REASONS FOR DISMISSAL

The Build Alternatives — B1 and B2 — were dismissed from consideration for the following reasons:

Alts B1 and B2

— These alternates would remove 187 more acres of undeveloped land and impact 21 more acres of wetland than Alt B3.

— They would remove an additional six residences and one farmstead.

— Revised projections for the local cities and the Metropolitan Region and the resultant traffic forecasts indicate the more complicated design of Alts B1 and B2 (in particular the relocated section of TH 55) won't be needed.

— Because of the inclusion of (or provision for) the relocated section of TH 55, both Alts B1 and B2 were inconsistent with the MC's transportation plans for the area and region.

— Because of the large amount of land required for their construction, these alternates were less acceptable to some of the local cities.

— The potential for development in the southeastern areas (near TH 55) beyond the Metropolitan Urban Service Area line would be greater under Alts B1 and B2 than B3. Thus, these alternates would be inconsistent with the MC's effort to restrict development to the MUSA area.

The No-Build

The No-Build Alternate was dismissed from considerations for the following reasons —

— Under the No-Build, deficiencies on the area highways would still exist because the improvements made would not satisfy the traffic demands of this cooridor. The existing and projected traffic forecasts indicate the need for a 6-lane freeway.

— The No-Build would be contrary to the region's planned transportation system.

— The No-Build would result in negative impacts on the planned development in the Project Area.

COMMENTS ON IMPACTS

DIRECT

The discussion on the probable impacts of the proposed improvements in the DEIS (Section VI) was based primarily on Alts B1 and B2, since Alt B1 would have had the greatest impact on the area and Alt B2 — when upgraded to include TH 55 — would eventually have had the same impact as Alt B1. The Selected Alternate, Alt B3, will have less of an impact on vegetation and wildlife and will require less right-of-way because no provisions will be made for relocating the section of TH 55.

SECONDARY

More development might have occurred in the vicinity of the proposed I-494 and I-35E interchange under Alt B1 and Alt B2 (in its Final Stage) than under B3, mainly because of the additional traffic movements that Alt B1 would have allowed in this area.

4(f) AND 6(f) INVOLVEMENT

The Selected Alternate, Alt B3, will require 18 acres of land for a pond and drainage ditch in Fort Snelling State Park, located in the Minnesota River Valley just south of St Paul and Minneapolis, Mn. (All of the build alternates for I-494 would have required land for a pond.) The proposed pond and drainage ditch will constitute a 4(f) and LAWCON 6(f) involvement. (A 4(f) involvement occurs when a project requires the use of any land from a historic site or publicly owned land from a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance. A 6(f) involvement occurs when the impacted area has used Land and Water Conservation funds — LAWCON — in its development, as is the case in Fort Snelling State Park.)

The Minnesota Department of Natural Resources, jurisdictional agency for the park, will retain ownership of the 18-acre ponding area. Mn DOT will obtain from the DNR a permanent easement for the ponding area and a temporary construction easement for an additional 12 acres. Under a maintenance agreement, Mn DOT will dredge the pond to remove sedimentation and perform skimming for floating debris, when necessary. Mn DOT will also establish a program for monitoring the water quality of the pond. (See the Final 4(f) Statement, Replacement Lands, p 230.)

Designed to serve as a sedimentation basin, the proposed pond is one of many that the DH's Hydraulic Section developed as part of a drainage plan for proposed I-494. (Ponds serving other drainage areas are located elsewhere along the proposed route.) Originally, Mn DOT had planned to locate the pond north of I-494. During the preparation of the DEIS, Mn DOT agreed to a request from DNR to locate the pond south of I-494. The DNR wanted to share the pond for the runoff from a trail center it had planned to construct in the area. Subsequent to the circulation of the DEIS, the DNR informed Mn DOT of their decision to move the trail center about 2.5 miles south of the I-494 crossing.

Since the pond is no longer needed for runoff from the trail center, the location north of I-494 is more suitable for proposed I-494's drainage plan. The proposed drainage plan for I-494 maintains current drainage patterns. Currently, the runoff from a section of Eagan's industrial area and TH 13 enters the floodplain just north of I-494. If the pond were located south of I-494, a drainage pipe would have to be placed through the inplace roadbed and embankment (placed in 1973). The extensive excavation required to place the pipe would mean additional impacts in the floodplain, since the fill has become stabilized and the embankment naturalized with vegetation. This shift in location was agreeable to the DNR, USFWS, and the Corps of Engineers (meeting on May 9, 1978, see Wetlands, Coordination with other Agencies, p 101).

The construction of the pond should result in only minimal impacts on the park and flood plain. An existing road leads from TH 13 into the area of the park where the proposed pond will be located. The Minnesota Department of Natural Resources (DNR), jurisdictional agency for the park, has used this road as a haul road in the past, and the Division of Highways (DH) will probably use it during the construction of the pond. The DNR placed fill in the ponding area several years ago, so the ground is fairly stable and should not require any fill to support construction equipment. Should it develop that some areas will require fill for stability, the fill will be removed or allowed to remain in place, whichever the DNR prefers.

Proposed I-494 will pass between sections of the park on land which the DH acquired in 1966 in a joint acquisition with the Minnesota Department of Conservation[7] (see Section I, Joint Planning, p 15). Of the 465 acres acquired, the DH retained 16 acres — enough for the I-494 crossing. The DH did not retain the land needed for the proposed pond and ditch because preliminary design plans were not sufficiently developed at the time of the joint acquisitions. Thus, drainage and other detailed construction requirements were not known.

An alignment change to avoid the park is not feasible and prudent because the park stretches nearly 4.7 miles north to south and proposed I-494 will cross it at about the central section.

(See the Final 4(f) Statement accompanying this FEIS).

PROBABLE IMPACTS

Introduction

Probable Impacts Of The Proposed Action

Probable Impacts Of The No Build

INTRODUCTION

Prior to and during the preparation of this report, specialists from the DH gathered and evaluated data on the natural, cultural, and economic resources in the project area and in the Metropolitan region. These were specialists from soils, geology, hydraulics, landscape architecture, forestry, wildlife biology, economics, and transportation. The data which the specialists gathered has been compiled into a number of sub-reports (a list of reports used follows each section in the division titled "References"). These reports served as bases for the following discussion of the impacts which would most likely result from the No-Build Alternate and from the implementation of this proposal. The discussion appears in the following two sections:

Probable Impacts of the Proposed Action
Probable Impacts of the No-Build

The discussion on the probable secondary and direct impacts of the proposed action is categorized as follows:

SECONDARY IMPACTS

Industrial and Commercial Development

Population and Dwelling Units

Resources

Vegetation and Wildlife

Traffic

Community Services

Central Districts

DIRECT IMPACTS

Social and Economic

Air and Noise

Open Space and Aesthetics

Vegetation

Wildlife

Wetlands

Flood Plain

Flood Hazard Evaluation

Water Quality

Construction

PROBABLE IMPACTS OF THE PROPOSED ACTION- SECONDARY IMPACTS[1]

Several considerations are important in assessing the secondary impacts of I-494:

(1) One is the importance the project area cities place on completing the Functional Classification Plan (FCP- See p 11). The cities in the project area consider the entire system important to development in the area, although one highway may mean more to a particular city than another.

(2) Another important consideration is the method which the Metropolitan Council (MC) and local municipalities used to make employment, population, and dwelling unit projections. These projections are predicated on the assumption that the FCP will be completed and that the industrial, commercial, and residential development will occur.

(3) A third consideration is the MUSA[2] designation which the MC has given the project area. This designation means that in its overall regional planning, the MC considers the project area suitable for urban growth and has designated the area to receive public facilities: Highway improvements, water, sewer, and other utilities. The cities in the project area either have these facilities or plan to construct them.

(4) The proposed highway improvements have been planned for since 1958. Most of the cities in the project area have made substantial expenditures of capital in anticipation of their completion, including street, sewer, and water improvements. Also, a number of major developers have built or bought land in the area under the assurance that the proposed highway improvements would be made. (See additional discussion in Impacts Of The No-Build, p 119).

INDUSTRIAL AND COMMERCIAL DEVELOPMENT

Proposed I-494 and the related highway improvements will mean increased industrial, commercial, and residential development for several of the cities in the project area. The principal areas of new development will be in Eagan. Mendota Heights and Inver Grove Heights will also experience a substantial amount of development.

Eagan plans full development of the Eagandale Industrial Park, located in the vicinity of the proposed I-494 and I-35E interchange. Overall, the park contains 2700 acres (1240 acres are developed) and will constitute about 70% of Eagan's industrial development on completion. Eagan also proposes a major diversified center for this area. The multi-use center will occupy about 100 acres. It will contain 1.6 million sq. ft. of shipping space, 2.0 million sq. ft. of other development (office and shopping space), an 800-bed hospital, and about 2,000 units of apartments.

[1] Page 74 lists the reports that serve as basis for the discussion in this section.

[2] Metropolitan Urban Service Area

According to Eagan, proposed I-494 will generate about 33% of the development planned for this area.[3] It's very likely, however, that some of the development is dependent on the completion of I-35E, proposed to run north-south through Dakota County. Either way, whether totally or partially dependent on I-494, this development is planned for and considered essential for the economy of the area and region.

Some industrial and commercial development will occur in Mendota Heights and Inver Grove Heights, although it will be much less than that in Eagan. Most of Mendota Heights industrially and commercially zoned land is near the proposed I-494 and I-35E interchange. Several companies are in the area already; most of the land (about 200 acres) is undeveloped, however. Inver Grove Heights has only a small amount of existing and proposed industrial and commercial facilities. This development, although somewhat dependent on proposed I-494, is more dependent on proposed TH 3 and existing TH 56 (Concord St).

POPULATION AND DWELLING UNITS

The industrial, commercial, and highway development in the project area will cause an increase in the population and in the number of dwelling units. Table 6-1 shows the past, current, and projected population, employment, and dwelling units within a five-mile radius of the Eagandale industrial and commercial area. Although not all the growth will be attributed to development in the Eagandale area, this development will undoubtedly be the major influence. A small percentage of the growth will probably occur through individuals and families migrating to the area from the central areas, independent of the industrial and commercial development.

TABLE 6-1

PAST, CURRENT AND PROJECTED GROWTH
WITHIN FIVE MILES OF EAGANDALE CENTER

YEAR	EMPLOYMENT	DWELLING UNITS	POPULATION
1960	51,107	58,685	203,310
1970	89,014	72,630	230,877
1980	119,754	84,534	268,219
1990	134,594	105,697	304,892
2000	158,429	116,472	352,731

NOTE: This table doesn't reflect the new Metropolitan Council projections (October 1977).

3 From a December 1972, letter from the City of Eagan, on file at the DOT office, Oakdale, Mn.

MAJOR IMPACT ON RESOURCES

New development in the project area (including dwelling units) will mean a major impact on the regions' natural resources: energy, water, and undeveloped land. Energy and water consumption will increase, and new demands will be placed on the sewage disposal system. Because this growth has been planned for, this impact will be much less than in an area where scattered, unguided growth occurs, however. The area's energy needs have already been considered in the overall projected needs for the metro region in the coming decades; the metropolitan sewer system has been extended to the area; and the cities have carefully considered the need for ample open space in the future (for example, Eagan plans to increase its land devoted to open space and recreational use from 2400 to 4500 acres).

VEGETATION AND WILDLIFE

Urbanization of the project area will have major affects upon the remaining natural vegetation and wildlife. The landscape in the area will change greatly if the cities in the project area develop as planned.

In the areas adjacent to the proposed route (the Preferred Corridor), the existing landscape is generally rural. From the west bank of the Minnesota River Valley to South St Paul, farmlands, woodlands, grasslands, lakes, and wetlands dominate the landscape. Only scattered pockets of light industrial and low-density residential development occur in the area. With the extensive development planned, the area will change from a rural to an urban-suburban landscape. Most of the natural vegetation that remains will be in parks, around stormwater retention ponds, and along the roadsides.

The rate — and possibly the extent — of urbanization in the local cities is dependent upon completion of I-494 and the other highways proposed for construction in the area(see p 18).Thus, a portion of the vegetation and wildlife habitat lost to urbanization will be as a result of I-494's secondary impact.

Proposed I-494's secondary impact upon vegetation and wildlife will probably exceed its direct impact. Its likely, however, that the project area would eventually be fully developed and this vegetation and wildlife habitat lost even if the highway was never built.

TRAFFIC

The new development in the project area will mean increased traffic on some of the county highways and local streets. Again, the municipalities have planned for these increases. Mendota Heights has already made substantial street improvements, basing the changes on the expected development and on the proposed highway plan for the region; two Functional Classification Plan changes are underway in So St Paul; Eagan and Inver Grove Heights also propose street changes, also basing them on the proposed development. Dakota County also proposes major changes on a number of county highways in conjunction with the overall development in the project area.

The Mississippi River Bridge in So St Paul will also receive an increase in traffic as a result of new development in the project area (and region). Traffic projections indicate that only a relatively small increase will occur as a direct result of proposed I-494, however. Under either of the design alternates, traffic volumes in the year 2000 would be about 97,000 vehicles per day (see Appendix, Figures A2 and A3, p 209). Under the no-build, traffic volumes in the year 2000 would be about 94,000 vehicles per day.

Thus, under either the No-Build or Build alternates, traffic volumes will exceed the capacity of the present 4-lane bridge and construction of a bridge with a larger capacity will be necessary. The local municipalities and the DH are currently studying the possibilities of constructing a new bridge sometime in the 1980's.

COMMUNITY SERVICES

The new development in the project area and the increased population growth will necessitate new and expanded community services: schools, fire and police departments, and possibly library services. Most all the cities indicate some provisions for these expanded services in their comprehensive plans. With the increased tax base that the new development will bring, such expansions should be accomplished without difficulty. The need for expanded services won't be for sometime yet, however — probably 5 to 10 years after completion of the highway improvements in the area.

One positive benefit of this proposal to community services will be improved access to hospitals for residents in northern Dakota County. Proposed I-494 will provide better access to hospitals in Edina, Minneapolis, and So St Paul.

CENTRAL BUSINESS DISTRICTS

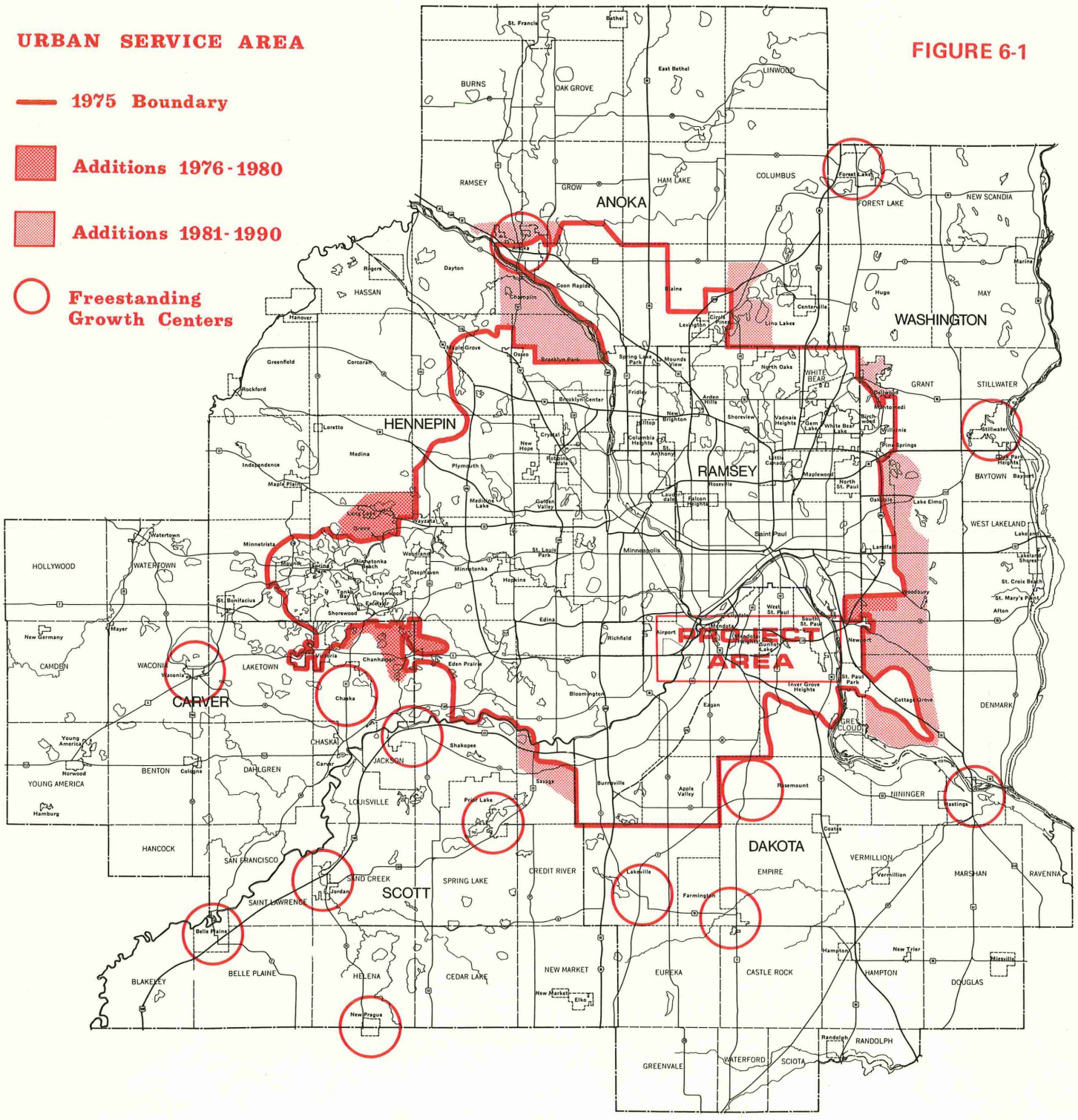
The proposed section of I-494 and the development which it will induce in the project area won't negatively effect the central business districts (CBD's) of downtown St. Paul and Minneapolis. Retail business in the CBD's declined in the 1960's and early 1970's and increased in the outlying areas, principally along the beltline route.[4] The CBD's have begun to reestablish themselves economically, however, this time as parent professional centers, serving as government, finance, insurance, and transportation headquarters, not only for the region but for the whole upper midwest. Also, a number of newly constructed high-density apartment buildings (with others proposed) have established the CBD's as important residential areas.

The planned I-494 route goes through an area which is rapidly becoming urbanized, but which is now partially rural. Thus, the urban sprawl and urban development issue are important to this project, because new major roadways can either be caused by or be a cause of urban sprawl. The concept of an urban service area and a rural service area has been advanced in the current Development Framework Chapter of the Metropolitan Development Guide in attempt to cope with the urban sprawl pattern.

The Metropolitan Council (MC) does have some control over a number of factors effecting development. The MC is using these tools in an attempt to contain growth within a Metropolitan Urban Services Area (MUSA). Figure 6-1 shows the current and future MUSA areas and boundaries.

The proposed section of I-494 is well within MUSA. The MC and the area communities are thus planning for growth to occur in this area. I-494, as a major area transportation facility, will serve the area as a necessary development tool, much as sewers and zoning do.

[4] This decline in the Twin Cities was similar to a nation-wide trend which occurred in the same decade. The decline was less in cities with beltways than in cities without beltways. For actual statistical comparisons, see page 46 of the Northern Dakota County I-494 Economic Report, prepared by the Mn DOT, Division of Highways, Oakdale, Mn.


URBAN SERVICE AREA
1975 Boundary
Additions 1976-1980
Additions 1981-1990
Freestanding Growth Centers
FIGURE 6-1
ANOKA
HENNEPIN
RAMSEY
WASHINGTON
CARVER
SCOTT
DAKOTA
PROJECT AREA
BURNS
OAK GROVE
LINWOOD
COLUMBUS
FOREST LAKE
NEW SCANDIA
RAMSEY
GROW
HAM LAKE
HASSAN
MAY
GRANT
STILLWATER
BAYTOWN
WEST LAKELAND
HOLLYWOOD
WATERTOWN
CAMDEN
WACONIA
LAKETOWN
CHASKA
JACKSON
DAHLGREN
BENTON
YOUNG AMERICA
LOUISVILLE
HANCOCK
SAN FRANCISCO
SAND CREEK
SPRING LAKE
CREDIT RIVER
SAINT LAWRENCE
BELLE PLAINE
BLAKELEY
HELENA
CEDAR LAKE
NEW MARKET
EUREKA
CASTLE ROCK
EMPIRE
VERMILLION
MARSHAN
RAVENNA
HAMPTON
DOUGLAS
DENMARK
NININGER
GREENVALE
WATERFORD
SCIOTA
RANDOLPH
Minneapolis
Saint Paul

REFERENCES

The Eastern Area Plan, (Bloomington Planning Commission, Bloomington, Mn, October 1972).

Land Use Development Guide, (Eagan Planning Commission, Eagan, Mn, January 1974).

Northern Dakota County Socio-Economic Report, Resource Section, Socio-Economic Unit, (Mn/DOT, Division of Highways, Oakdale, Mn, June 1976).

Transportation Planning Report for I-494, Resource Section, Transportation Planning Unit, (Mn/DOT, Division of Highways, Oakdale, Mn, September 1976).

Metropolitan Council of the Twin Cities Area, Metropolitan Development Guide, (St. Paul, Mn, September 1975).

Comprehensive Plan for Mendota Heights, (Village of Mendota Heights, Mn, October 1959).

Comprehensive Development Plan, (Village Planning Commission, Inver Grove Heights, Mn, 1967).

Sunfish Lake Comprehensive Plan (City of Sunfish Lake, Mn, September 1975).

PROBABLE IMPACTS OF THE PROPOSED ACTION– DIRECT IMPACTS.

This section discusses the significant direct (primary) impacts most likely to occur from the implementation of this proposal. The sub-reports used as bases for this discussion are listed on p 118.

SOCIAL AND ECONOMIC

Social

Because the proposed highway improvements will be constructed on corridors reserved for the purpose, they will have a minimum of negative impacts on existing development in the project area. Some negative impacts will occur through right-of-way (R/W) acquisitions. Another negative impact may occur as a result of the visual intrusion of the highway. Basically, the primary positive impacts will be increased mobility, reduced distribution costs, and savings in fuel and travel time.

Right of Way

Table 6-2 gives the general tax information for the cities in the project area and I-494's impact on their tax revenue. Initially, the impact of I-494's R/W acquisitions will be negative because the proposed action will take land and buildings off of the cities' tax rolls. Alternates B1 and B2 would remove 1594 acres of land. Alternate B3 will remove approximately 188 acres of land less than Alternates B1 and B2 or approximately 1406 acres (see Table 6-3). Alternate B3 will remove about 46 residences and 4 businesses. (B1 and B2 would remove an additional 6 residences plus 1 farmstead). The largest losses (dollars) will occur in Eagan, Mendota Heights, and Bloomington. Eventually, new taxes from the planned development will more than compensate for the tax losses sustained through R/W acquisitions.

About 912 of the 1406 acres needed for I-494 have been acquired (see Fig 6-2, p 77). Table 6-4, p 76 , shows the location and type of the remaining 494 acres. Of this total, 408 acres will come from Eagan, Mendota Heights, and Inver Grove Heights.

TABLE 6-2 IMPACTS ON AREA REAL ESTATE TAXES

	TAX BASE BY CITY					
	BLOOMINGTON	EAGAN	MENDOTA HEIGHTS	INVER GROVE HEIGHTS	SUNFISH LAKE	SOUTH ST. PAUL
ASSESSOR'S MARKET VALUE	1,062,662,739.	217,190,930.	87,921,412.	144,952,899.	5,795,603.	179,628,549.
ASSESSED VALUATION	404,379,612.	80,862,765.	32,000,467.	50,609,786.	2,170,859.	63,134,353.
ESTIMATED ASSESSED VALUATION OF RIGHT-OF-WAY	228,126.	560,443.	336,854.	263,036.	25,787.	29,002.
PERCENTAGE OF TOTAL TAX BASE AFFECTED BY RIGHT-OF-WAY	0.1%	0.7%	1.1%	0.5%	1.2%	0.1%

Relocation

Because of the availability of homes, rental units, and undeveloped land in the project area, relocation of families and businesses should not be a problem. Table 6-5, lists the homes offered for sale in the project area in April 1976. For comparison, table 6-6 lists the price range of the homes that still must be acquired. This list is representative of available homes during recent years and, in all probability, is indicative of the future market, barring an extreme local or nation-wide cutback in construction.

Three of the businesses can be relocated in the same general area. These are the following: A service station at 4680 So Robert Trail, a commercial building at Upper 52nd St and Booth Av, and a steel warehouse at 2550 Dodd Road. The fourth business, the Advance Terrazzo and Tile Company, can also be relocated in the area, as it is located near considerable acreage of undeveloped industrial land. Relocating the businesses should not result in any major impacts on the level of services, products, and employment provided to the local communities.

TABLE 6-3 ESTIMATED RIGHT-OF-WAY REQUIREMENTS FOR ALTERNATE B-3 (IN ACRES)**

USE	BLOOMINGTON	M.A.C. AND FORT SNELLING *	EAGAN	MENDOTA HEIGHTS	INVER GROVE HEIGHTS	SUNFISH LAKE	SOUTH ST. PAUL	TOTAL	PERCENT OF TOTAL
NEW RIGHT-OF-WAY TO BE PURCHASED	18.41	10.44	146.30	140.76	121.12	49.63	7.38	494.04	35.13
PREVIOUSLY ACQUIRED RIGHT-OF-WAY			164.48	174.95	51.87	20.41		411.71	29.27
PUBLIC ROADS AND STREETS			18.27	13.92	26.51	5.68	1.64	66.02	4.69
PRESENT HIGHWAY RIGHT-OF-WAY	22.75	129.29	22.35	36.72	100.99	16.78	105.81	434.69	30.91
TOTAL	41.16	139.73	351.40	366.35	300.49	92.50	114.83	1406.46	100.00

* Indicates the Airport and Fort Snelling Business District

TABLE 6-4 PRESENT LAND USE OF REQUIRED RIGHT-OF-WAY FOR ALTERNATE B-3 (IN ACRES)**

PRESENT LAND USE	BLOOMINGTON	*M.A.C. AND FORT SNELLING	EAGAN	MENDOTA HEIGHTS	INVER GROVE HEIGHTS	SUNFISH LAKE	SOUTH ST. PAUL	TOTAL	PERCENT OF TOTAL
AGRICULTURE			78.31	82.87	76.76	40.75		278.69	56.41
INDUSTRIAL			44.54	17.15	0.90		5.14	67.73	13.71
COMMERCIAL	7.16		1.37		5.48		0.60	14.61	2.96
RESIDENTIAL	11.25		20.39	16.70	37.93	3.98	1.50	91.75	18.57
TAX EXEMPT		10.44	1.69	24.04	0.05	4.90	0.14	41.26	8.35
TOTAL	18.41	10.44	146.30	140.76	121.12	49.63	7.38	494.04	100.00

* Indicates the Airport and Fort Snelling Business District

** Approximately 185 acres more would be needed for Alternates B1 and B2 (111 acres more in Eagan, 56 in Mendota Heights, and 18 in Inver Grove Heights).

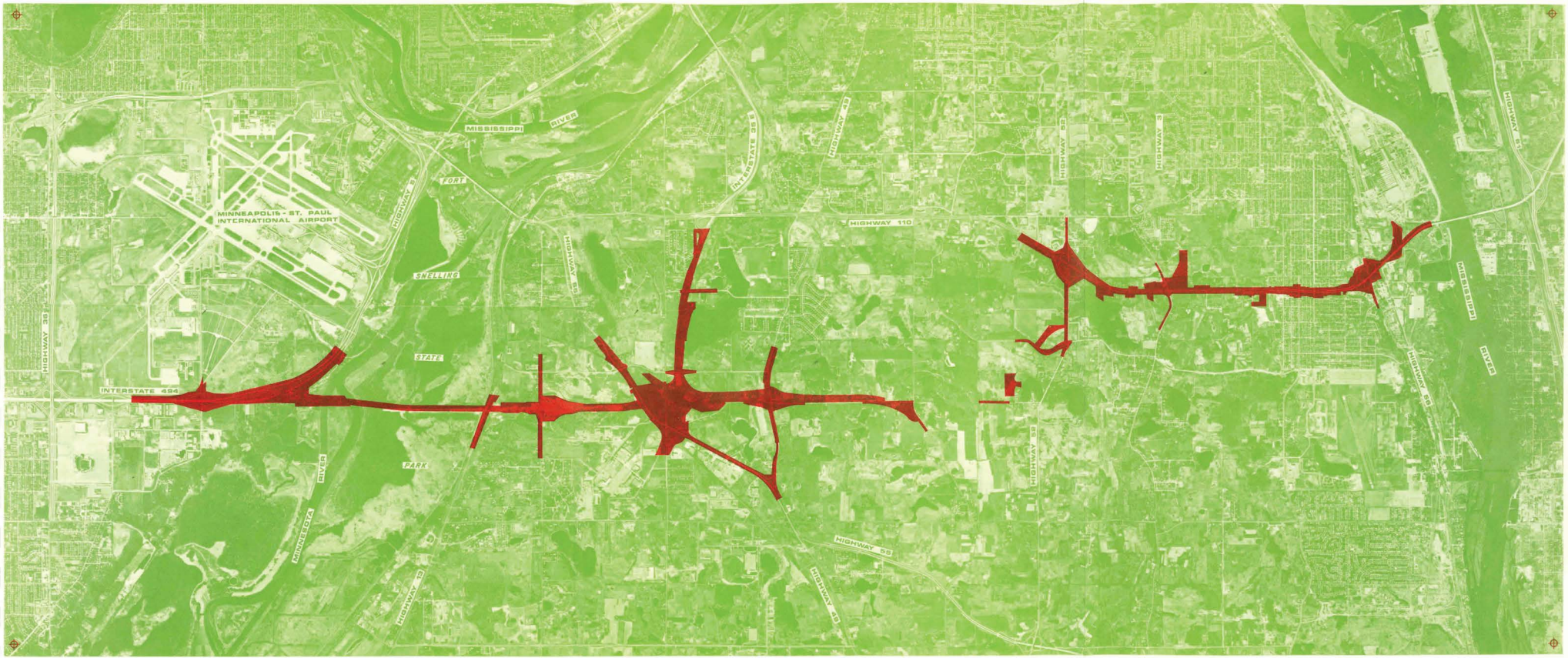

MISSISSIPPI RIVER
FORT
SNELLING
STATE
PARK
MINNEAPOLIS - ST. PAUL INTERNATIONAL AIRPORT
INTERSTATE 494
HIGHWAY 55
HIGHWAY 110
HIGHWAY 62
HIGHWAY 77
HIGHWAY 35
HIGHWAY 52
HIGHWAY 61
MINNESOTA RIVER
MISSISSIPPI RIVER
STATE OWNED RIGHT-OF-WAY
N
0
1000
2000
INTERSTATE
494

FIGURE 6-2

The DH's (Division of Highway's) District 9 Relocation Office, located at 3485 Hadley Av No, No St Paul, MN, will be responsible for providing the relocation services for this project. Personnel from the Relocation Office will assist the persons displaced as long as necessary to reestablish them in homes. Relocation benefits will include replacement-housing differential, moving costs, closing costs, interest differential, and appraisers fees, if any.

The Relocation Office will ensure that all persons will be relocated into decent, safe, and sanitary housing within their financial means, without regard to race, color, or national origin. (The proposed action doesn't impact any residential areas of minority or ethnic groups). Listed below are some of the DH's methods of securing housing information:

a. Newspapers
b. Personal contacts with realtors
c. Visual inspection of neighborhoods for privately listed homes
d. Completed city-wide MLS listings
e. Listings of Veteran Administrations and Federal Housing Administration
f. Personal contact with apartment complex managers
g. The Apartment Guide of the Twin Cities

TABLE 6-5 AVAILABLE HOUSING

PRICE RANGE IN THOUSANDS OF DOLLARS	LOCATION OF AVAILABLE HOUSING					TOTAL
	MENDOTA & DAKOTA CO.	MENDOTA HTS. AND EAGAN	SOUTH ST. PAUL	INVER GROVE HEIGHTS	BLOOMINGTON EAST	
0 to 10	1			1	1	.3
11 to 20			11		1	12
21 to 30			15	10	10	35
31 to 40	9	10	22	9	41	91
41 to 50	24	5	6	7	33	75
51 to 60	14	7	5	2	5	33
61 to 70	9	7	2	1	3	22
71 to 80	5		1	1		7
81 to 90	6	2	1		3	12
91 to 100	4	1		1	1	7
Over 100	7	3	1	1	4	16
TOTAL	79	35	64	33	102	313

* Multiple Listing Service (Data from Dakota County and Minneapolis Board of Realtors)

TABLE 6-6 PRICE RANGE OF HOUSES TO BE ACQUIRED

PRICE RANGE IN THOUSANDS OF DOLLARS	LOCATION OF HOMES TO BE ACQUIRED						TOTAL
	BLOOMINGTON	EAGAN	MENDOTA HEIGHTS	INVER GROVE HEIGHTS	SUNFISH LAKE	SOUTH ST. PAUL	
0 to 15				1		3	4
15 to 19						3	3
20 to 24		1	2	1	1		5
25 to 29		3	3	3			9
30 to 34			2	4			6
35 to 39		3	2	1			6
40 to 44		4	1				5
45 to 49		4		2			6
50 and above	1	2	4	1			8
TOTALS	1	17	14	13	1	6	52*

* Alt B-3 will take 6 less residences and 1 less farmstead.

Community Cohesion

None of the construction in this proposal will affect community cohesion. The highway construction will either occur on existing alignment or close to community boundary lines. Thus, the construction won't divide major residential areas, interrupt walk patterns, or separate community service facilities from residential area. Also, most all local street systems will be maintained, although some impedance to travel will occur during the actual construction. Alternate travel routes will be developed, however.

Residential Areas

Most of the residential units along or near the proposed I-494 route are in scattered locations, in small groups. This is because the residential areas weren't built around ethnic groups, shared behavioral patterns, or activity centers such as nearby commercial -business strips. Rather, they were built around physical amenities such as large lots, open space, and greenery.

Generally, this pattern of residential development continues throughout most of Eagan, Mendota Heights, Sunfish Lake, and Inver Grove Heights. Each city has only a limited amount of dense residential development. Bloomington and So. St. Paul have the most dense residential areas of all the project area cities. Only one small area in So. St. Paul will receive any significant impact from I-494, however. This area would still have a noise impact after construction if noise barriers weren't used.

Economic Loss

It's unlikely that homeowners in the project area will suffer economic loss because of the proposed highway improvements, for two reasons. First, the highway improvements occur in largely undeveloped areas. As pointed out in the previous discussion, the only large concentration of homes along any of the routes proposed for improvement is in So. St. Paul, south of inplace I-494. Because the reconstruction here will be along existing alignment with a minimal increase in right-of-way, the proposed improvement should have little or no impact on the value of homes in the area. Elsewhere, the nearest any of the highway improvements come to a group of homes is I-494 near Horseshoe Lake in Sunfish Lake.

The second reason that homeowners in the project area should experience little or no economic loss is the overall attractiveness of the area and the convenience of the location to the rest of the metropolitan region. The open space, greenery, and large lots should continue to keep the property values high. For the most part, the proposed highway improvements will not detract significantly from these natural features. Rather, because they will improve transportation locally and to the rest of the region, the improvements should be an enhancement. (Sunfish Lake makes a similar observation on page 14 of its Comprehensive Plan. It speaks of the boundaries — after the construction of proposed I-494 — as generally being major thoroughfares, giving residents "isolation as well as accessibility...").

Psychological Reactions

Psychological reactions to highways generally occur when strong feelings against the construction of a highway exists in a particular area. The anticipated visual intrusion of the highway or the threat of displacement might bring about psychological reactions. Such reactions may have developed in some residents in the immediate project area as planning for the improvements has progressed.

Proposed I-494 will displace several homes with large properties in Mendota Heights. This displacement occurs in a scenic area, this particular one spanning about a mile. In Sunfish Lake, proposed I-494 passes close to a small group of homes (near Horseshoe Lake). Here, and elsewhere in the general area, residents could possibly be sensitive to the construction of the highway and consider it a definite intrusion.

Little can be done to mitigate the effects of this kind of reaction. Homeowners displaced will receive relocation benefits and fair-market prices for their property. Also, the proposed highway will have noise walls and landscaping where necessary. In all probability, however, these measures will do little to ease some residents' feeling of loss. Residents place a high value on the aesthetic appeal of the area, and some will consider the highway an unwanted intrusion no matter what measures the DH uses to mitigate harm. For residents displaced, the one consolation might be the availability of land in other scenic areas in the immediate project area and throughout much of Dakota County.

Economic Impacts

The improvements in this proposal will be beneficial to existing development in the project area. The proposed segment of I-494 will complete the beltline route, eliminating the circuitous route of the TH 5-Mendota Bridge-TH 110 link. This will result in reduced distribution costs to companies in the project area with large shipping and receiving operations. Also, it will mean savings in travel time and fuel for those motorists commuting to work daily along the present route.

About 47% of the respondents to a survey which the DH conducted in the project area * indicated that the completion of I-494 would mean an increase in business for them, mainly because they would be able to save the extra mileage and travel time required to travel the present route. Similarly, the President of the Livestock Market Institute of So. St. Paul, in an appearance before the Interstate Study Committee, said that the completion of I-494 and I-35E would mean a 30% increase in business for the stockyards (a 550 million dollar a year business).

Motorists commuting to work along the present circuitous route have to spend considerable time in stop and go movements during rush hours and periodically through the day. The eastern approach to the Mendota Bridge, where TH's 13, 55, and 110 intersect, is a recurrent problem area. Back-ups at time range from 1 to 2 miles. About 23,500 of the 35,000 daily eastbound vehicular trips across the bridge are motorists traveling from Bloomington and the nearby cities to northern Dakota County. With I-494 complete, these motorists will save considerable money, fuel, and time by taking the proposed I-494 bridge into northern Dakota County.

AIR AND NOISE

Air Analysis

The analysis of the air quality in the project area followed the US Environmental Protection Agency's "Guidelines For Air Quality Maintenance Planning and Analysis, Volume 9, Evaluating Indirect Sources" screening process and AP42, Supplement 5. The Volume 9 screening process provides peak one-hour and eight-hour average carbon monoxide (CO) levels at selected receptor sites along the highway. Estimated amounts of CO used in the analysis are the totals of the ambient concentrations and the emissions from generated traffic (amounts computed based on the forecasted ADT).

Volume 9 uses emission factors based on EPA, AP42, Supplement 5, with a 1975 background concentration of 1.0 (ppm). As federal CO emission standards tighten, and as more vehicles are equipped with efficient emission control devices, CO levels will be lowered. The vehicle mix of 88% autos and 12% lightduty trucks, as used in Volume 9, is considered appropriate for this air study. The correction factors were reduced to 0.9 for 1976, 0.4 for 1980, 0.3 for 1985, and 0.2 for 1990 and beyond. Weather factors used in the air analysis were as follows: (1) wind speed 1 meter per second, (2) wind direction of 10^{o} (angle) to the roadway at each receptor site, (3) 8 hour persistence factor of 0.6, and (4) stability D.

* Resource Section, Socio-Economic Unit, Northern Dakota County Economic Report, (Mn DOT, Division of Highways, Oakdale, Mn, June 1976).

The analysis determined that the maximum CO concentrations at the four receptor sites will be within both the Federal and Minnesota Ambient Air Quality Standards (See Table 6-7 and Fig. 6-3, p 84). Federal Standards allow a maximum of 35 ppm of CO for a one-hour period and 9 ppm for an eight-hour period. State Standards allow 30 ppm for a one-hour period and 9 ppm for an eight-hour period.

The DH computations show that the highest CO concentrations will occur at Receptor No. 4, located at 5th Ave. in So. St. Paul. In a one-hour period, the highest concentration will be 6.3 ppm; in an eight-hour period, 2.0 ppm. These computed levels depict the concentrations under the worst traffic and weather conditions.

State Implementation Plan

The proposed action complies with the FHWA Air Quality Guidelines for transportation system planning, both at the state and metropolitan levels. On September 27, 1976, the FHWA approved the Air Quality Report for I-494. On the basis of the air quality study, both the FHWA and the DH considers the proposed action consistent with the State Transportation Plan for air quality.

Locally, the proposed action is part of the overall metropolitan transportation plan as developed by the Metropolitan Council. The FHWA and the Urban Mass Transportation Administration, after consultation with the Minnesota Pollution Control Agency and the Environmental Protection Agency, has certified the planning process for the transportation plan.

TABLE 6-7 CARBON MONOXIDE CONCENTRATIONS* FOR PEAK HOUR AND 8-HOUR PERIOD (For Alternate B1)**

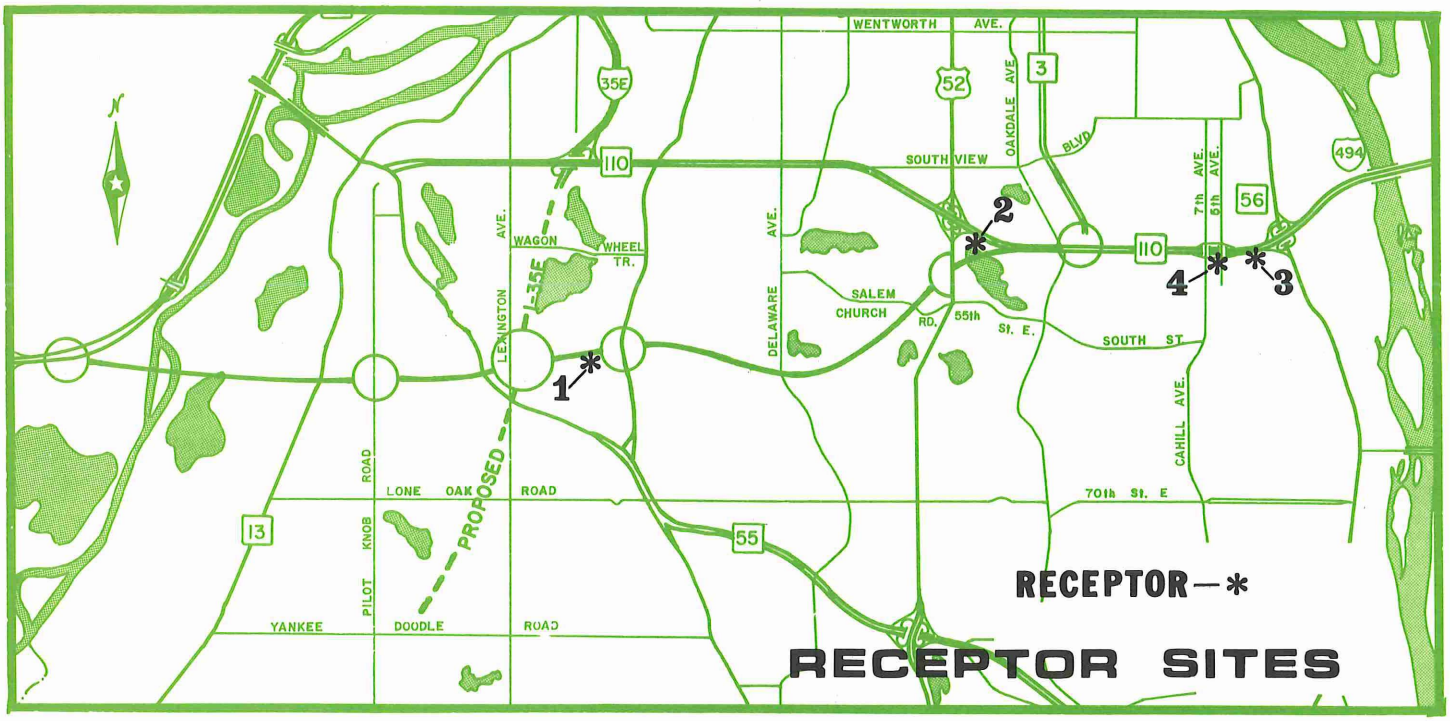
RECEPTOR	ALTERNATE	1975 & 1976		1980		1985		2000	
		1 hr.	8 hr.	1 hr.	8 hr.	1 hr.	8 hr.	1 hr.	8 hr.
1	Build			3.1	1.4	2.3	1.1	1.9	0.8
	No-Build								
2	Build							1.7	0.6
	No-Build	8.3	3.0	5.0	1.7	4.8	1.4	4.2	1.4
3	Build			3.3	1.4			4.8	0.7
	No-Build	7.4	3.2	3.5	1.3			4.1	0.9
4	Build			6.3	1.6			5.4	1.0
	No-Build								

Note: Interim year air quality predictions are not provided due to the low levels obtained from the design year (2000).

* In parts per million. See Air Quality Report for I-494 (Mn DOT, Division of Highways, Oakdale, Mn, September, 1976) for complete analysis information.

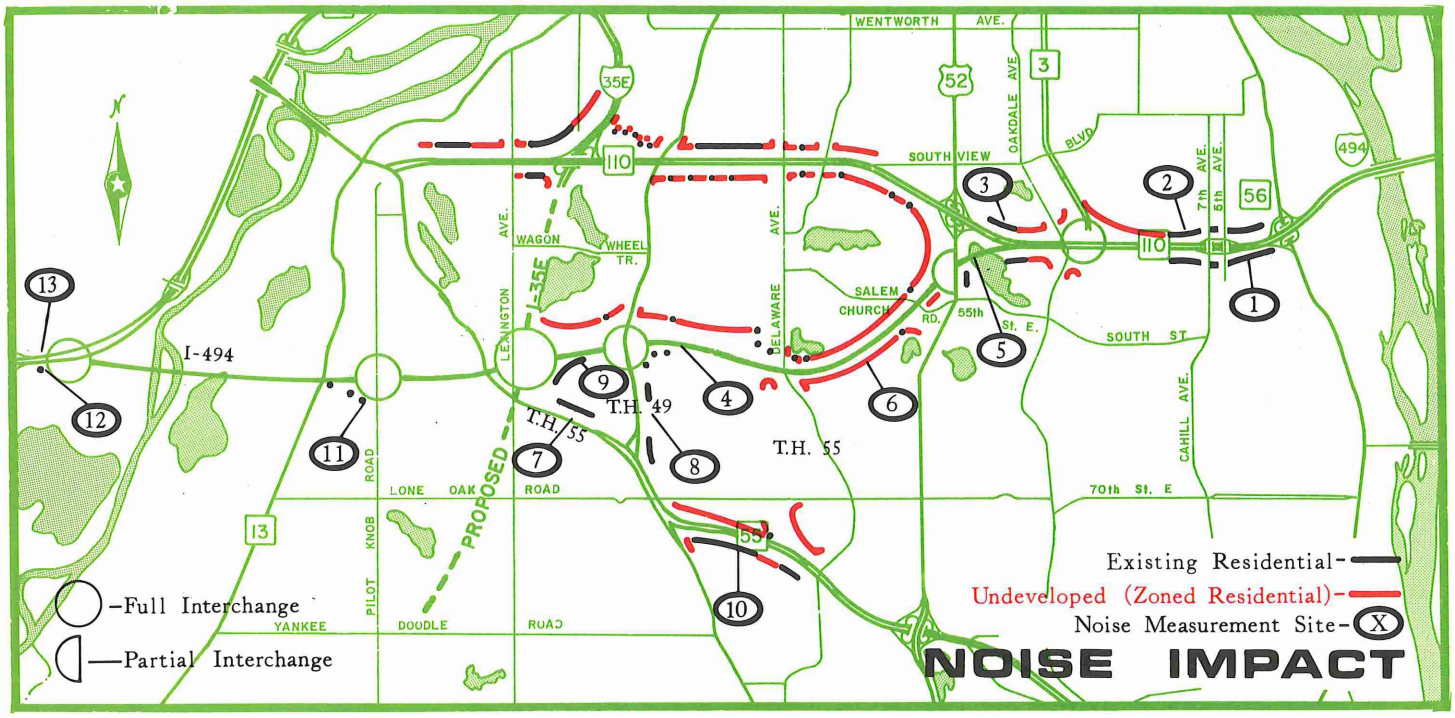
** Alternates B2 and B3 will be less

FIGURE 6-3



Note: Distances from receptor sites to mixing cell are as follows: Site 1 (to frontage road), 50 ft (15 m); Site 2 (measured to R/W line because of great distance from roadway to nearest receptor), 100 ft, or 30m; Site 3, 154 ft (47m); Site 4 (to frontage road), 33 ft (10m).

FIGURE 6-4



Noise Analysis

Table 6-8, summarizes the existing and predicted noise levels at receptor sites along the Preferred Corridor and the other highways proposed for improvement. Fig 6-4, p 84, shows the land use and location of the sites.

Method Used

Analysts from the DH used field measurements to determine existing noise levels. For future noise levels, they used the year 2000 estimated traffic volumes and the method given for computing noise levels in the National Cooperative Highway Research Program, Reports 117 and 144. Computed noise levels are for the peak traffic hour, 4 to 5 PM — the noisiest traffic hour of the day.

Airport Influence

The Metropolitan Airport Commission's publication "Master Plan for the Minneapolis-St. Paul International Airport" contains present and future noise impacts (from aircraft) on land uses adjacent to portions of the proposed I-494 corridor. The year 1982 is the target date for improved noise conditions resulting from aircraft improvements and changes in approach angles.

One residential area containing three homes is currently impacted by aircraft noise and would be impacted by proposed I-494 (see Fig 6-4, Noise Measurement Site 11). Other adjacent land tracts are zoned light industry, which is a compatible land use.

TABLE 6-8 NOISE IMPACTS ON RESIDENTS BEFORE AND AFTER ABATEMENT

SITE NUMBER	EXISTING NOISE LEVELS	ALTERNATE B1				ALTERNATES B2 & B3			
		PREDICTED NOISE LEVEL WITHOUT ABATEMENT (YEAR 2000)	NUMBER OF RESIDENCES AFFECTED BEFORE ABATEMENT	ABATEMENT POSSIBLE TO OR BELOW L_{10} 70 dBA*	RESIDENCES IMPACTED AFTER ABATEMENT BY A LEVEL GREATER THAN L_{10} 70 dBA	PREDICTED NOISE LEVEL WITHOUT ABATEMENT (YEAR 2000)	NUMBER OF RESIDENCES AFFECTED BEFORE ABATEMENT	ABATEMENT POSSIBLE TO OR BELOW L_{10} 70 dBA*	RESIDENCES IMPACTED AFTER ABATEMENT BY A LEVEL GREATER THAN L_{10} 70 dBA
1	73	76	32	Yes	None	76	32	Yes	0
2	73	76	42	Yes	None	76	42	Yes	0
3	74	77	12	Yes	None	77	12	Yes	0
4	50	73	4	(A)	4	70	4	(A)	4
5	65	73	3	(B)	3	73	3	(B)	3
6	50	70	7	(A)	7	70	7	(A)	7
7	71	68	0	Not Needed	0	74	9	(B)	9
8	71	71	4	(B)	4	74	4	(B)	4
9	50	74	12	Yes	0	71	12	Yes	0
10	70	73	3	(B)	3	73	11	(B)	11
11	67	73	3	(A) (C)	3	73	3	(A) (C)	3
12	70	73	4	Yes	0	73	4	Yes	0
13	74	77	1	Yes	0	77	1	Yes	0
Totals			127		24		144		41

* State Standards: L_{10} 65 dBA, daytime; L_{10} 55 dBA, nighttime, see page 86.

(A) Abatement may be feasible but necessary information is not yet available.

(B) Abatement is not feasible due to uncontrolled access.

(C) Abatement is not feasible due to Airport Noise.

Noise Impacts

Based on forecasted traffic volumes for the year 2000, future noise levels will exceed the federal guidelines of L_{10} 70 dBA[5] up to 350 ft from the proposed highways median centerline. Under Alt B1, 127 residential uses[6] would be subjected to a noise impact; under Alt B2, 144. Alt B1 would affect less residential uses than Alt B2 and B3 because inplace TH 55 would have less traffic under Alt B1 (with the relocated section of TH 55) than under Alts B2 and B3 (without the relocated section). This increase in traffic under Alts B2 and B3 would result in a noise impact at Noise Measurement Site 10 (see Fig 6-4, p 84). Adequate attenuation, to or below the L_{10} 70 dBA noise level, is possible and will be provided at all but 24 residential units under Alt B1 and 41 under Alts B2 and B3 (See Table 6-8, p 81).

Included in the residential units that cannot be attenuated are four residences at Site 4 and seven at Site 6 (Fig 6-4) for which attenuation might be possible. Sites 4 and 6 extend over a 1.5 mile section of proposed I-494. The residences along this stretch are in scattered locations, and the feasibility of providing noise abatement for these isolated locations requires additional detailed study. During this detailed study, consideration will be given to providing attenuation through the use of mounding. Noise walls may be added if mounding is determined to be impractical.

The DH's Noise Unit is presently preparing overall abatement plans. Our overall design will attempt to reduce traffic noise levels to the State standards for residential land use (L_{10} 65 dBA, daytime; L_{10} 55 dBA, nighttime — see State Noise-Level Standards, Table A-4, p 212). In some areas it may be necessary to request an exception to Federal or State standards, or both (see Table 6-8, p 85). When completed the abatement plans will be presented to local officials and affected residents.

Included with the plans will be an assessment for undeveloped lands adjacent to the proposed highway improvements, with recommendations when appropriate. The assessment will include maps depicting future noise levels, for the local officials use in their land-use planning. Coordination with local officials will continue throughout the development of the project. In addition to this measure, project area cities — like all cities, counties, and regional development commissions in Minnesota — have received copies of the "The Audible Landscape," a Federal Highway Administration Publication. This handbook provides guidance for land-use planning, plat layout, and building design for compatible development near traffic noise.

Noise from construction activity isn't expected to be a problem. Although some unique receptors (Visitation Academy and Convent and St. Mark's School, for example) are in the immediate project area, none are close enough to be affected by construction noises. The DH will require the contractor to comply with applicable local and State laws and ordinances during construction.

5 Noise is most commonly measured in a unit called decibels and weighted on the A scale. L_{10} 70 dBA means that the 70 decibel noise level can be exceeded 10% of the time.

6 Residential uses include picnic areas, recreation areas, playgrounds, active sports area, certain types of parks, residences, motels, hotels, public meeting rooms, schools, churches, libraries, and hospitals.

The Environmental Protection Agency (EPA) and the Minnesota Pollution Control Agency (MPCA) were asked to review both Noise and Air Quality Reports for I-494. The EPA responded to both reports, stating that "Based on these two reports, we do not anticipate any adverse environmental impacts regarding air quality and noise." The MPCA responded only to the Air Quality Report stating that "this project is not inconsistent with the State Implementation Plan,"(See EPA letter, p 131; MPCA letter, p 130).

OPEN SPACE AND AESTHETICS

The proposed highway project will have a positive impact upon access to designated open space areas.

Open Space

Proposed I-494 will be beneficial to both Fort Snelling State Park and the Minnesota Zoological Garden. When complete, it will provide a direct route to the park for a large number of residents in the Metro Region. According to park officials about 754,000 people visited the park in 1974. Park officials estimate that attendance at the park in 1980 will be about 2,000,000.

The main route for the visitors from the suburbs east, southeast, and northeast of St Paul will be the I-494 and I-694 beltline. Without the proposed link of I-494, this traffic will have to take the existing route TH 110, the Mendota Bridge and TH 5. Avoiding this route will not only benefit these motorists through savings in time and fuel, but it will also help to lessen traffic congestion along the route.

The Minnesota Zoological Garden, which opened in May 1978 will also benefit from proposed I-494. About 60% of the projected annual visitors to the Zoo will come from the Minneapolis-St Paul Area. The majority of the visitors from St Paul will get to the Zoo via proposed I-35E through Eagan. Again, as with the visitors to Fort Snelling State Park, visitors from the suburbs east, southeast, and northeast of St Paul will use I-494 to reach I-35E.

Aesthetics

The major aesthetic impacts of the project will be the removal of vegetation and water bodies (lakes and wetlands).

Six woodlots will be partially or totally removed by the project.

Eight wetlands will be totally removed, seven will partially be filled in, several may be used as ponding areas.

Minimization of Harm

Various measures will be taken to minimize adverse visual impacts.

1. Preservation of vegetation on the right-of-way especially in interchange areas. The following are the best areas to do this —
   — 35E and I-494 interchange
   — I-494 and Trunk Highway 49
   — Between Schmidt Lake and TH 52 and TH 110.
   — TH 3 and TH 110.

2. Bridge Aesthetics. The I-494 motorist will travel under 17 bridges along this route. This means he will see a bridge every 30-40 seconds. Since the bridges are viewed in quite rapid succession,they will be designed to visually complement one another. Clear span bridges will be visually more acceptable than center pier bridges.

A bridge study model for the Minnesota River crossing will be made since it has extreme high visibility from the park and possibly from the FWS Refuge.

3. Noise Barrier/retaining wall aesthetics. Noise barriers and retaining walls will be designed to be attractive and complementary. Their design will be coordinated with the bridges. Mn/DOT's office of Environmental Affairs will prepare a visual study and design guide. Detail designers for I-494 will use the guide as an aesthetic handbook.

4. Preservation of wetlands and creation of highway Ponding Areas.

   Ponding areas along the route will be designed to offer visual diversity, both in slope and in size. Wooded areas will be avoided as areas for ponding sites wherever possible. Ideally, ponding areas should be located adjacent to wooded areas. This provides for a scenic setting as well as offering ideal wildlife habitat. The siting of wildlife on or adjacent to the right of way is an extremely important visual amenity.

   The wetlands that are used for storm water drainage will be graded if necessary to ensure that emergent vegetation will grow near the shoreline. The emergent vegetation will give the wetlands a natural appearance and offer good wildlife habitat.

   Some trees may be lost along the shores of flooded wetlands. Some of the dead trees will be left to allow nesting and perch sties for wildlife. The remaining trees will be removed if they appear unsightly or are a safety hazard.

Table 6-9, gives the total acreage of the different land types included within the proposed highway right-of-way. The proposed right-of-way encompasses 32 acres of lake, river and wetlands, 113 acres of woodland, 680 acres of openland, 100 acres of developed land and 145 acres of existing highways.

TABLE 6-9 LAND TYPES

LAND TYPE	APPROXIMATE ACREAGE	PERCENT OF RIGHT-OF-WAY
River	5	0.5
Lake	5	0.5
Wetland	22	2.1
Woodland	113	10.6
Openland	680	63.5
Developed	100	9.3
Roads	145	13.5
Total	1,070	100.0

All of the land within the highway right-of-way will not be displaced or altered by the proposed project. About 85 percent of the right-of-way will be disturbed during construction. Also, the total acreage of land types in Table 6-9 includes the inplace section of roadbed from the east bank of the Minnesota River to just west of the proposed I-35E interchange. The grading and roadbed on this section was completed in 1973. The roadsides have been seeded and now support a permanent cover of grassy vegetation. This section of roadway also contains some woods and wetlands that were not displaced by the original construction. Most of this natural vegetation and the grassed roadside will not be disturbed when the project is finished.

VEGETATION

The major impact of the proposed project upon vegetation will be the removal of parts of several large woodlands. Overall, woodlands comprise only about 10 percent of the right-of-way. These are a remnant of the vast hardwood forext and oak savanna that once occupied the metro-area. As such, these woodlands have ecological, recreational, and esthetic values. Six large areas will be impacted. These are at the following locations:

1. Between the west bank of the Minnesota River and TH 5.
2. On the island in the Minnesota River.
3. Between the east bank of the Minnesota River and the highway embankment in Gun Club Lake.
4. At the proposed interchange of I-494 and I-35E.
5. About ¼ mile east of TH 49.
6. Northwest of Horseshoe Lake.

Elsewhere the proposed project passes through mostly grassland exposing trees to excessive evaporation of soil and plant moisture.

Trees not removed outright may still be lost through exposure, wind throw, changes in soil moisture, compaction of soil around roots, and injuries caused from impacts from construction equipment. Some trees in wooded areas bisected by the highway may experience increased growth rates. This will be due to increased sunlight and increased photosynthesis resulting from less competition because of clearing activities. On the other hand, deep cuts through woodlands may result in decreased tree growth by exposing trees to excessive evaporation of soil and plant moisture.

Another problem associated with highway construction is the introduction of salt into the environment through highway drainage. During the winter, the DH will use salts for ice control on the highways in this proposal. Information available indicates that salt can have a detrimental effect on soil and vegetation in near roadside areas.

The effects of salt on vegetation is generally insignificant beyond 30 feet from the edge of the pavement, as most salt remains in the snow along the roadway shoulders. Within this 30 feet, heavy salt concentrations can occur, mainly because the water volume is usually small and only limited flushing occurs.

Salt concentrations are more of a danger to plant species than to animals, as plants can't readily expel excess salt. Grassy plants adjust more readily to higher salt concentrations than do woody plants and, therefore, are more tolerant of de-icing salts. Injury to woody plants occurs either by the plants direct contact with salt sprays or by the plants absorbing the salt into its root system.

Minimization of Harm

Three techniques will be used to minimize impacts to vegetation. These are preservation, repair and landscaping. Tree removal will be kept to a minimum in the six large woodlands and elsewhere along the right-of-way where large valuable trees occur. Trees will only be removed where necessary for construction purposes and for conformance with safety standards for clear zones. Where practical natural vegetation will be preserved in medians and interchange islands, Figure 6-6 shows a conceptual plan for vegetation preservation in the I-494 and I-35E interchange area. The exact location of the areas of natural vegetation which will be preserved cannot be determined until detail design of the project is done. Before construction the DH will prepare an Environmental Design Guide which will include a plan that identifies the specific areas of vegetation that can be preserved.

Where injuries to trees occurred during construction tree wounds will be trimmed and dressed to prevent disease. Trees which have suffered root damage will be pruned to balance above ground tree size with the loss in root size.

The DH will also landscape the right-of-way to restore some of the lost vegetation. Trees and shrubs will be planted to help provide a visually pleasing right-of-way for motorists and to minimize the impact of the project upon nearby residents. Landscape work in the vicinity of Schmidt Lake will be more involved than elsewhere along the route. In addition to plantings here, the landscape plan will include a walkway and bike trail (see discussion on Schmidt Lake, p 101).

(See Impact on Water Quality, Steps to Minimize Harm, p 109, for a Discussion of the Minimization of Harm from Salt.)

WILDLIFE

The direct impacts of the proposed project upon wildlife includes the following —

- permanent loss of wildlife habitat (paved for highway).
- conversion of more productive wildlife habitats (woodlands, brush marsh) to less productive wildlife habitat (grasslands, ponding areas).
- formation of a partial barrier to animal movements.
- disturbance of animal behavior patterns by increased noise and activity.
- increase mortality of wildlife because of roadkills.

These impacts will result in a decline in the population levels of most wildlife species within the project area. The decline for each species will be in a proportion equal to or somewhat greater than the quantity of their habitat destroyed. Those species of wildlife which require wetlands or woodlands to exist will be impacted more than other wildlife species because the wetland woodland habitats are in relatively low supply.

The highway project itself should not cause the total elimination of any local wildlife populations. Since man has been present in the project area for many years, only those species of wildlife which are tolerant of man's activities remain in the area. These populations of animal are capable of adapting to the presence of the freeway. However, some species will be eliminated from the project area when the surrounding lands are fully developed.

No federally listed species of threatened or endangered wildlife are known to reside within the project area.

The completed freeway will have some positive value as wildlife habitat. Some natural vegetation in the right-of-way will be left undisturbed during construction. This vegetation will be protected from future development and will retain much of its original habitat value. The freeway will also create new edge vegetation in cuts through dense hardwood stands and the grassed roadsides and landscape plantings of trees and shrubs have habitat value for certain species of wildlife.

The overall loss of wildlife caused by the proposed project is probably insignificant on a countywide scale. The loss is possibly a significant inroad upon the wildlife resources left within the project area.

Minimization of Harm

Several measures will be taken to minimize wildlife impacts.

Deer

The occurrence of some deer-car collisions must be expected after construction of the highway, especially along forested areas and in the Minnesota River Valley. Studies have shown that deer frequently jump right of way fences to cross highways even though safe passages are available. The frequency of highway-wildlife mortality is usually highest for a few years following construction and then declines somewhat as wildlife populations adjust to the traffic.

The Minnesota River bridge has been designed so that it does not block movements of deer along the valley floor the new bridge will span enough of the floodplain to allow the deer continued freedom of movement along both sides of the river.

According to the manager of Fort Snelling State Park (interview, April 1975), the inplace roadway embankment and sand blanket blanket placed in 1972 has not obstructed animal movement. The herd of deer which winters in the park has always moved along the more stable ground near the river channel. In the several years since the roadway embankment and sand blanket has been in place, the deer have continued to winter in the park. Also, no noticeable change has occurred in the diversity and number of smaller animals that inhabit or migrate to the wildlife refuge north of proposed I-494.

On the east side of the floodplain a heavily vegetated travel-lane will be developed to channel deer movements. Natural tree regeneration and tree and shrub plantings will be used to create a dense cover of vegetation along the east side of the valley (see Fig 6-5). Deer moving along the east edge of the valley should seek this vegetated travel lane. Their movements will then be funneled beneath the I-494 roadway under the TH 13 bridge. This will reduce roadkills of deer by keeping the deer from crossing over the roadway along the fill section in the valley.

Small Animals

In the wooded sections of the river valley brush piles will be provided along the righ-of-way. The brush piles will be made from trees and shrubs cleared for new construction.

When safety permits dead standing trees will be preserved in the river valley. These "snag" trees will provide nesting, feeding and perching sites for wildlife.

Vegetation along the roadsides in the river valley and adjacent to wetlands or wooded areas will be kept in a natural, unmowed condition and, thus, will blend in with the surrounding landscape. This grassy vegetation will provide nesting cover for pheasants, ducks, and other wildlife.

Waterfowl

Ponding areas will be designed with flat slopes and irregular shorelines to restore wetland habitat (see Wetlands, p 99). Depending upon drainage conditions, it may be possible to upgrade some lowsvalue wetlands for waterfowl by increasing water levels.

WETLANDS

The major impact upon wetlands will result from construction of the roadway embankment. Part of or all of 15 wetland basins will be displaced (see Fig 6-5, p 93). Embankment construction involves excavating the muck and peat down to stable mineral soil. Then the excavated portion of the wetland is filled with gravel and sand to the desired roadbed elevation. The resulting impacts are as follows —

- drainage and removal of vegetation and topsoil from wetlands
- interference of water movement through the wetlands with possible loss of seepage flow into ground water
- loss of a diversity of habitat through change in vegetation composition.

Table 6-10 lists the total size of each wetland basin, the area of each basin that will be displaced, the proportion of each basin that will be displaced and the wetland type of each basin, as defined in the U.S. Fish and Wildlife Service's Circular 39, Shaw and Fredine 1971.

MINNEAPOLIS - ST. PAUL INTERNATIONAL AIRPORT
MISSISSIPPI RIVER
FORT SNELLING STATE PARK
MINNEHAHA CREEK
INTERSTATE 494
HIGHWAY 110
HIGHWAY 55
HIGHWAY 62
HIGHWAY 77
HIGHWAY 35
INTERSTATE 35E
HIGHWAY 13
HIGHWAY 5
HIGHWAY 100
HIGHWAY 169
HIGHWAY 212
HIGHWAY 41
HIGHWAY 52
HIGHWAY 65

- PONDING AREAS
- IMPROVABLE WETLANDS
- PRESERVED WETLANDS
- WOODLOTS REMAINING AFTER CONSTRUCTION

NATURAL RESOURCES PRESERVATION & ENHANCEMENT

N

0 1000 2000

INTERSTATE 494

FIGURE 6-6

In summary, approximately 21.1 acres of wetland would be displaced by embankment construction. This includes 0.5 acres of Type II wetland, 6.5 acres of Type III, 5.5 acres of Type IV, 7.6 acres of Type V and 1.0 acres of Type VI. Of the 15 basins affected, eight will be totally displaced, seven partially.*

Construction activity may temporarily impact the 7 partially-displaced wetlands and any wetlands located immediately adjacent to the project corridor. Sedimentation, turbidity and changes in water level may occur during the construction work. This will result in a temporary loss and alteration of some plant and animal life. Once construction is complete, the sedimentation and turbidity will return to normal conditions, water levels will stabilize and new plant and animal populations will be re-established.

The 21.1 acres of wetland displaced is about 4.9% of the 425 acres of wetlands (90 basins) in a 8000 ft corridor along the proposed route, 3% of the 700 acres in the project area (165 basins), and 0.13% of the 16,000 acres in Dakota County.

TABLE 6-10 IMPACT ON WETLANDS (SEE FIGURE 6-5)

BASIN	TOTAL AREA	APPROXIMATE AREA DISPLACED	PERCENT DISPLACED	WETLAND TYPE
A	0.1 acres	0.1 acres	100%	III
B	1.2	0.5	42	II
C	1.0	1.0	100	VI
D	1.0	1.0	100	III
F	2.0	1.0	55	IV
F	0.8	0.8	100	III
G	1.2	0.3	25	III
H	1.5	0.9	60	IV
I	2.3	1.3	57	IV
J	1.0	1.0	100	IV
K	50.0	4.8	10	V
L	1.2	1.2	100	IV
M	3.8	2.8	74	V
N	1.8	1.8	100	III
O	2.5	2.5	100	III
Totals	71.4 acres	21.1 acres	30%	

* Wetland Types: Type I, Overflow Basin; Type II, Fresh Meadows; Type III, Shallow Marsh; Type IV, Deep Marsh; Type V, Lakes; Type VI, Shrub Swamp; and Type VII, Wooded Swamp.

Another important impact upon wetlands will result from the construction of stormwater retention ponds for highway runoff. The Division of Highways (DH) has identified 11 potential sites on which ponding areas for highway runoff may be constructed. Runoff froms the highway will also drain into two proposed municipal ponding areas known as Eagan ponds FP-1 and IP-5. The two Eagan ponds and the 11 proposed highway ponds are shown on Fig 6-6, p 95 . Table 6-11 lists the type of land on which each highway pond would be built and the location and approximate size of each pond.

Using wetlands as stormwater retention ponds would have both negative and positive impacts. The addition of highway runoff may limit the potential wildlife productivity of high value marsh areas such as Type III, IV, and V wetlands. The stormwater runoff would result in greater fluctuation of water levels of flow rates and altered chemical composition of waters through increases in dissolved salts, nutrients and heavy metals. Drainage from the highway will also result in an increase in the amount of surface runoff entering the wetlands and a decrease in the diversity of habitat through loss of emergent marsh vegetation. On the other hand, adding water to low-surface wetlands such as Type I, II, and VI would have beneficial value because it could possibly upgrade them to Type III, IV, or V wetlands.

TABLE 6-11 PONDING AREA SITES

LOCATION	LAND TYPE AFFECTED	APPROXIMATE SIZE OF PONDING AREA
1. Eastern Floodplain	Woodland	1.5 acres
2. Western Floodplain	Type II & III Wetland	15.0 acres
3. Just east of Delaware North of I-494	Type IV Wetland	1.5 acres
4. Just east of Delaware South of I-494	Type III & IV Wetland	3.5 acres
5. Just west of Horseshoe Lake	Openland	3.0 acres
6. Southwest Quadrant of TH 110 & Robert St. interchange	Type III & IV Wetland	7.0 acres
7. Southeast Quadrant of TH 110 & Robert St. interchange	Open land	1.5 acres
8. Severed portion of Schmidt Lake north of I-494	Type V Wetland	1.0 acre
9. Northeast Quadrant of I-494 & TH 3 intersection	Type III Wetland and Open land	8.0 acres
10. Trailer Court pond (Expansion of existing highway pond)	Openland	3.0 acres (dry pond)
11. Just east of Mississippi River Bridge	Type II & III Wetland	3.0 acres

A positive impact resulting from using wetlands for stormwater retention will be their protection from future development. Since the project area is changing from rural to urban use, many of the wetlands in the region might eventually be filled for development. Acquiring and using the wetlands for stormwater retention will at least save them from total destruction.

The DH will enhance the wildlife productivity of the ponds by constructing them with moderate side slopes so that they will be conducive to the growth of acquatic vegetation and, thus, be good habitat for waterfowl. These ponds will provide an additional benefit by controlling flooding and improving water quality for areas downstream from the basins. They will also serve as containment areas should an oil spill occur.

The exact size, number, and location of the ponding areas that will be built can't be determined at this time. This information won't be available until the final design of the project is completed. Constructing all the proposed ponds would result in about 12 acres of new Type V wetlands in upland areas. It would also change the water quality and levels, size, and productivity of about 33 acres of existing Type II to V wetlands. With the proper design, most of the ponding areas should provide favorable habitat for wildlife.

Alternatives to Miss Wetlands

A shift to either the north or south would require substantially more wetlands. A sand blanket, placed to support equipment during the construction of the proposed bridge, and the roadway embankment are already in place at the currently proposed crossing. (This work was completed in 1973, under previous location and design approval from the Federal Highway Administration). Moving the alignment would mean reconstructing the sand blanket and embankment. This reconstruction — north or south — would impact about 45 acres of additional wetlands (Gun Club or Slaters Lake and the surrounding marsh land. See Fig 3-4, p 40). Also, it would mean an additional 4(f) and 6(f) involvement, since Fort Snelling State Park lies north and south of the currently proposed crossing. A shift in alignment would impact about 32 additional acres of wetlands farther east in Dakota County. Thus, a total of about 77 acres of wetland would be impacted with an alignment shift, compared to 21 acres under Alt B3, the Selected Alternate.

A shift in alignment would also result in a loss of the land already purchased for the proposed highway. About 900 acres of land have been acquired along the Preferred Corridor, most of it prior to 1970 (see State Owned Right-of-Way, Fig 6-2, p 77). Shifting the alignment would mean new acquisitions in an area of existing residential, industrial, and commercial development. A large amount of undeveloped industrial and commercial land would also be impacted.

Minimization of Harm

The DH will use the following measures to mitigate wetland impacts —

- Incorporate design features that will minimize harm.
- Use construction features that will minimize harm.
- Improve some existing wetlands.
- Replace wetlands
- Protect wetlands

The following list of proposed minimization projects will be investigated and will be implemented if they prove practicable.

1. Several design features will be used to minimize wetland encroachment. In cut or fill sections the standard slope for roadside banks is a 6:1 slope. Where wetlands are adjacent to the roadway, these slopes will be steepened beyond the traffic recovery area to reduce wetland displacement. It may also be possible to make minor adjustments in the horizontal and vertical alignment of the roadway to reduce wetland involvement. Fig 6-6, p 95, shows a conceptual plan of a possible design modification of the TH 3 and I-494 intersection which may be used to reduce wetland displacement.

2. Various construction features will be incorporated to minimize sedimentation of wetlands. Mulch, sod and temporary grasses will be used on exposed slopes which drain into wetlands to control erosion. Where conditions warrant, straw bales, slope drains, dikes and sediment basins will be used in drainage ways leading to wetlands. Rip-rap and sod will be used as a permanent means of erosion control in problem areas.

3. About nine acres of wet meadow, shallow marsh, and shrub swamp areas along the highway corridor will be improved for wildlife. These wetlands now lack sufficient water levels to be top quality habitat for wildlife. They will be upgraded to deep marshes by impounding highway runoff in them. This would also improve water quality since marsh ecosystems are capable of removing several highway related pollutants from runoff waters. The DH has identified eight wetland basins along the corridor which have potential for improvement. These are shown on Fig 6-5, p 93.

4. Some new wetland basins will be created. As indicated in the discussion on stormwater retention ponds, up to 12 acres of new wetland may be created in upland areas. Also, some additional acres of new wetland will be created in the existing wetlands proposed to be used as ponding areas. Some of these wetlands could be expanded in size with the addition of highway runoff.

5. Several wetlands along the highway corridor are located partially within or directly adjacent to the proposed highway right-of-way. The wetlands could be protected from future development by purchasing a wide enough right-of-way to include them within the highway corridor. Six wetlands, totaling 5 acres, shown on Fig 6-5 are being considered for partial or complete purchase. These wetlands were selected on the basis of their wildlife productivity and scenic attributes. Some of the wetlands being considered for purchase could also be used for ponding.

Coordination with Other Agencies

The DH will work with the Minnesota DNR to formulate mitigation measures where wetlands are involved. It will also continue its coordination with the US Fish and Wildlife Service (USFWS).

Representatives from the DNR and the USFWS have made field inspections of the I-494 project with the DH and Federal Highway Administration. Field walks with the DNR on the I-494 project date from 1973 to 1978. The USFWS was involved in several field walks with the DH from 1976 to 1977, the last one occurring in October 1977.

Since January 1977, the Hydraulics Engineer from the DH's District 9 Office and the Regional Hydrologist from the DNR have met monthly to discuss and resolve any problems that might result fromsthe impact of highway construction on wetlands, lakes, and rivers in District 9*. The proposed construction of I-494 has been an integral part of these discussions.

The DH met with the DNR, USFWS and Corps of Engineers on May 9, 1978 to review proposed I-494's impact on wetlands and the proposed mitigation measures. Letters from the DNR and USFW commenting on the impacts and mitigation measures appear in Section X, Coordination, p 137 and 138.

SCHMIDT LAKE

Proposed I-494's impact on Schmidt Lake will require a Section 404 Permit fromsthe US Corps of Engineers. Also, the DH will have to renew its permit from the DNR for the encroachment into Schmidt Lake. Issued in 1972, this permit expired in March 1977. The DH will obtain these permits and comply with the requirements.

Schmidt Lake is the only lake which would be encroached upon by the proposed project. The highway will pass near two other lakes — Hornbeam and Horseshoe — but will not encroach upon them. Constructing the roadway embankment and placing a sand blanket in the Minnesota River flood plain resulted in the filling of a portion of Gun Club Lake (in 1973). The remaining construction in the floodplain will not result in any additional encroachment into the lake.

Schmidt Lake is a 62.9 acre lake, located near the intersection of Robert Street (TH 52) and TH 110. Proposed I-494 passes through the northwest corner of the lake, filling in 4.75 acres. Roadbed embankment construction requires 4.25 acres of water surface. The slopes extend an additional 0.5 acres in the lake below water level. In addition, the roadbed severs 1.0 acres from the lake. After the roadbed construction and the 1.0 acres severance it will measure 58.15 acres. (The lake is 7 ft. at its deepest point).

Proposed I-494's passage through Schmidt Lake won't increase significantly the lake's potential for flooding. Normal elevation of the lake is 937.5. A recent study determined that in times of heavy runoff, intermittent water retention up to elevation 940 could be tolerated for short periods without causing appreciable damage to surrounding property.

* Approximately the eastern half of the metropolitan area.

Adding the fill for the section of highway will reduce the acre-feet of storage capacity in the lake only minimally. Should a major storm cause flooding, an overflow ditch will carry the overflow from the lake to a pond to the east near TH 3 (see Fig. 6-10, Drainage Map, p 111). From there, the overflow would go to the Mississippi River.

History and Characteristics

The lake dates from the turn of the century when local farmers formed it by filling a drainage ditch leading from a large low-area.

An eight hundred acre watershed is the main source of water for the lake. Water enters from direct runoff and through a high water table in the surrounding land. In the early years, the watershed was cultivated farmland. Now, however, various developments have replaced most of the farmland. Although some open land is still in the area, only one farm remains.

Recreational use of the lake is limited. Because of the poor quality of the water (turbid-unpleasant odor), the lake has never been used for swimming. It sees some use, however, for canoeing and ice skating. Although some minnows and bullheads are present, the shallowness of the lake results in winter freeze-out, not permitting the build-up of game fish populations.

Aside from serving as a watershed basin, Schmidt Lake's importance is in the aesthetic value to area residents. Construction of apartment buildings near the lake has not changed the basic land features. The land around the lake is still gently rolling with some tree growth.

Development around the lake follows an urban pattern. Twenty-nine acres on the west side of the lake have been developed into a semi-luxury multi-family housing project, totaling 320 units. Construction is underway on 528 units — eventually to span about 30 acres on the east side of the lake. An additional 9 acres on the west side (near the north end) is zoned commercial. (Street construction in the developed area aligns with the off-ramp of proposed I-494 at Robert St.)

Public Hearing

Minnesota State Law requires a permit from the Commissioner of the Department of Natural Resources (DNR) before any change can be made in the cross-section of any public waters in the State. On July 27, 1971 the DH applied for a permit to route proposed I-494 through Schmidt Lake. Because of the magnitude of the overall job and the degree of public interest, the Commissioner ordered a public hearing on the application. Date and location of the hearing was November 4, 1971, in the Council Chambers, Village of Inver Grove Heights, Minnesota.

On March 7, 1972, the Commissioner of DNR granted the permit. Bases for the final decision were the testimonies and evidence presented in the hearing, and the DNR's own analysis of the project. From these, the DNR concluded that highway safety and transportation needs would be substantially sacrificed if the proposed route were changed. Also, it concluded that the land use and comprehensive plans of most of the surrounding communities would be upended — at a high cost to the communities.

Requirements of Permit

The permit carried several requirements. The Division of Highways (DH) had to take deep soil borings to determine if the lake was suitable for dredging. This requirement was set aside.

Another requirement was that the DH landscape the highway embankment nearest the lake. The landscaped embankment would allow the public limited use of the space as a walkway or bike trail. The third requirement was that the DH exercise strict control over the construction to ensure optimum protection against damage to the environment. The DH will comply with these requirements.

Additional Permits Required

Prior to the construction of I-494 through Schmidt Lakes, a Section 404 permit will be required from the US Corp of Engineers.

Impact on Schmidt Lake

The impact of the runoff from proposed I-494 on the plant and algae life in Schmidt Lake will be minimal, primarily because runoff from the nearby highways and developed areas already enters the lake. Thus, the plant and algae life have adjusted to the pollutants in highway runoff. A second reason that the impact will be minimal is the comparatively small amount of new runoff that will drain from I-494 into Schmidt Lake. Other than the approximately 560 ft section of the highway that will pass through the lake, the drainage plan for proposed I-494 won't divert any additional watershed area into the lake.

The major impact of I-494 on Schmidt Lake will be in the placing of the fill for the roadbed. Filling operations will destroy the aquatic vegetation in the fill area and will suspend sediment in the water, possibly eliminating or inhibiting some plant and algae growth in other areas of the lake for a short time. Eventually, the sediment will settle out and the turbidity level will return to normal (the lake has a high turbidity). In time — because of the shallowness of the lake and the penetration of sunlight to the lake bottom — plant and algae growth outside the actual fill area should also return to normal.

Minimization of Harm

One means of keeping these impacts localized will be to keep the construction area separate from the rest of the lake by means of a Curtain. This would be an actual curtain of special material suspended on the top with flotation gear and anchored to the lake bottom. The curtain would be left in place until the fill operations are completed.

Another possible means of minimizing impact would be to create a band of marshy vegetation along the shoreline of the road embankment. This vegetation would provide habitat for the waterfowl and wading birds which use Schmidt Lake and would make the area more natural appearing. Suitable growing conditions for marshy vegetation could be provided by making the embankment slopes beneath the waters surface very gentle to create a shallows out from the edge of the shoreline. (See Fig 6-7, p 104). Establishing vegetation along the embankment would also help to protect the banks from erosion.

Placement of additional fill material into Schmidt Lake would be necessary to provide shallows along the embankment. This would have to be approved under DNR's permit since it may conflict with DNR's policy to minimize displacement of Public Waters. The shallows would require that an additional acre of the lake be filled.

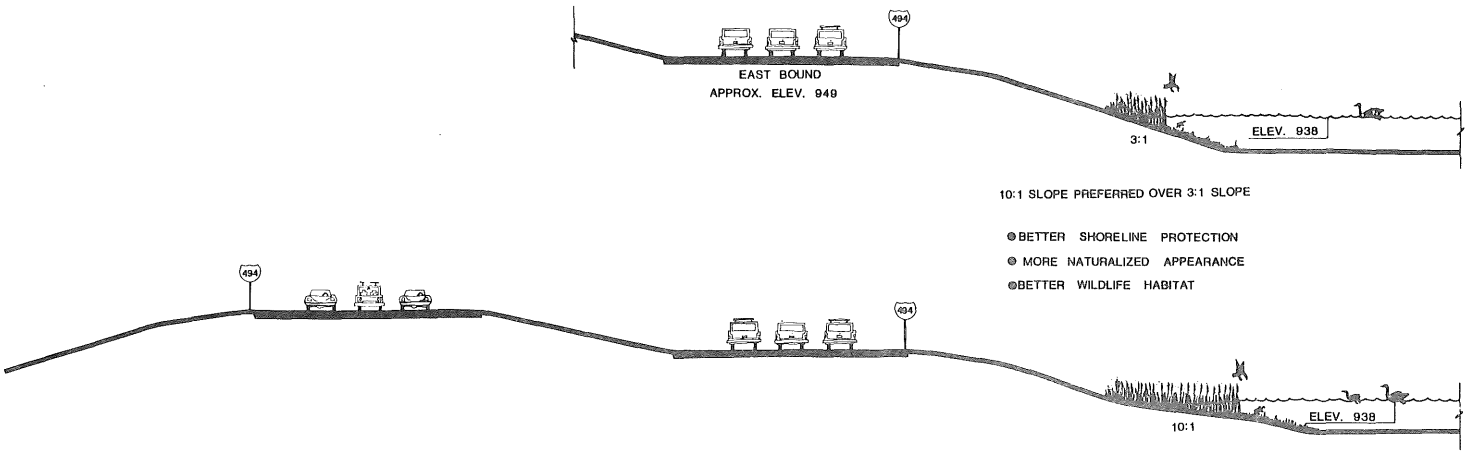


FIGURE 6-7 EARTH FILL ALTERNATIVES FOR SCHMIDT LAKE

FLOODPLAIN

The low level areas adjoining a river is known as a flood plain. A flood plain is subject to flooding during periods of peak water flows. In the vicinity of the proposed I-494 bridge over the Minnesota River, the flood plain is about 1.5 miles wide.

Proposed I-494's impact on the flood plain should be minimal. Some work has been done in the flood plain under contracts awarded prior to the EIS requirement. The Department has placed sand blankets east and west of the river and a roadway embankment east of the river to TH 13, completing the work in 1973. (See History, Development, and Current Status, p 15).

The sand blanket, which will serve as a support for construction equipment, is about 174 feet wide throughout, with an average depth of 10 feet. Placing the sand blanket didn't require any excavation, as it was placed on the marshy surface soil and allowed to work down to stable sub-soil.

The roadway embankment is about 0.7 miles long. Unlike the sand blanket, placing the embankment required extensive peat and swamp excavation, to a depth of 30 feet in some places. All excavated material was used later as slope dressing along the roadway embankment.

A representative of the Minnesota Department of Natural Resources (DNR) inspected the site frequently during construction and periodically afterwards. According to the manager of Fort Snelling State Park (which extends the breadth of the flood plain) the construction has caused little if any environmental harm. Little or no siltation has occurred from the sand blanket of roadway embankment.

According to the park manager (interview, April, 1975), the most significant negative impact of the proposed construction on the flood plain will be a visual one. The presence of the bridge and highway will detract from the natural appearance of the flood plain. Park users most directly effected by the view of the bridge and highway will be those using the trail centers which the DNR proposes for both sides of the river south of proposed I-494. Both centers will be several hundred feet from proposed I-494, but the trails will pass under the bridges.

Minimization of Harm

Although little can be done to minimize the visual impact of the bridge and highway on the flood plain (Fig 6-8, p 106), certain aspects of the park's development plans and the bridge design will help compensate for their presence. For one thing, proposed development plans for the park places areas of most intense use closer to the north end of the park. Thus, most visitors to the park will have only a long range view of the bridge and highway. Another favorable aspect is the way in which the bridge allows the trail system to pass underneath. Fig 6-9, p 106, is an artist's concept of the trail under the eastern end of the bridge.

FLOOD HAZARD EVALUATION

The US Geological Survey has established the elevation of a 100-year flood in the vicinity of the proposed I-494 crossing at 715.3 and the flood-protection elevation at 716.2.

Calculations indicate that the proposed I-494 bridge across the Minnesota River will create a swellhead [7] of .13 foot. This is within the 0.50 foot limit which the DNR, the controlling agency, has established.

The I-494 bridge across the Minnesota River will require permits from the following:

1. US Coast Guard
2. US Corp of Engineers
3. Minnesota Department of Natural Resources
4. Lower Minnesota Watershed District
5. The City of Bloomington
6. The City of Eagan

All permit requirements will be complied with prior to construction.

[7] A damming effect on the water that the bridge and fills would have it the time of flooding. Its measured in ft of elevation.

FIGURE 6-8

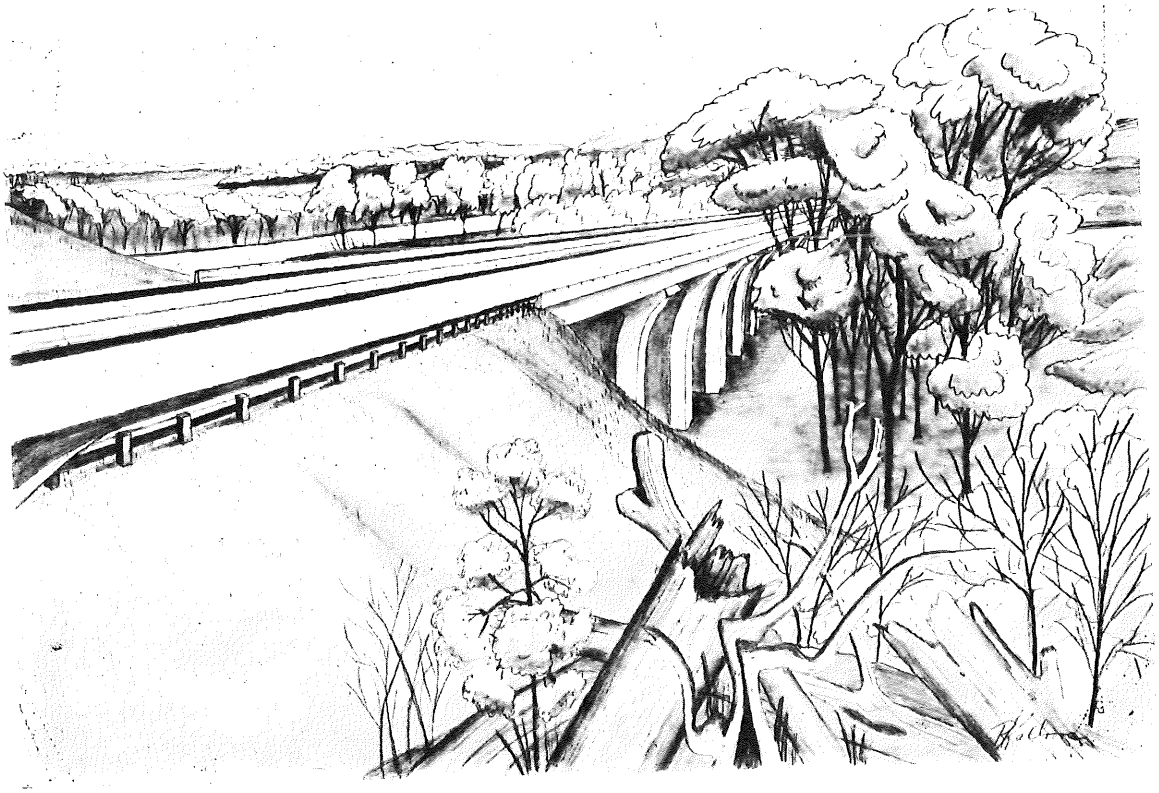


FIGURE 6-9

WATER QUALITY

This section discusses the impacts that proposed I-494 will have on the water quality in the project area. The most significant impacts will occur on the Minnesota River and Schmidt Lake — on the Minnesota River because of the construction of the bridge and the large quantity of runoff that will eventually reach the river, on Schmidt Lake because of I-494's passage through the lake. For the remaining lakes and most of the remaining ponds, the impact will be minimal. The proposed drainage plan won't divert any additional drainage areas into Hornbeam or Horseshoe Lake or the Mississippi River in So St Paul. Proposed I-494 won't impact any private or public wells. The geologic study for I-494 indicated that no shallow wells are within 200 feet of the alignment. Also, the study showed that no minicipal water supply sites are close to proposed I-494.

Salt Concentrations and Turbidity

The chart below gives the existing water quality in the Minnesota and Mississippi Rivers and in several of the lakes in the project area. The remaining lakes aren't listed here because data on them hasn't been compiled. The chart lists only turbidity and chloride levels because these are most commonly associated with highway drainage. (For a more complete chemical analyses, see the water quality report for I-494, listed in the references on page 118).

	Mississippi River at St. Paul, Minnesota	Minnesota River at Fort Snelling State Park, St. Paul, Minnesota	Hornbeam Lake	Horseshoe Lake	Schmidt Lake
Turbidity In Jackson Units	4 to 30	3 to 100	3 to 13	2 to 5	0 to 6
Concentrations of Chloride in parts per Million	9.1 to 16	14 to 50	3.6 to 5.6	16 to 24	47 to 87

Table 6-12, p 108, gives the analysis of chloride concentrations in the lakes after the construction of proposed I-494. With present methods of predicting the amount of salt in highway runoff that reaches water bodies, these figures can only be considered estimates. More precise figures will be available through the water monitoring program recently instituted in the project area. The water-monitoring program is discussed in the Minnesota River, Minimization of Harm, p 110.

The Minnesota Polution Control Agency (MPCA) has established standards for permissible concentrations of effluents that disposal systems can discharge into rivers and lakes. These disposal systems are called "point sources." For the rivers and lakes in the project area, permissible concentrations from point sources are as follows:

Turbidity	25
Dissolved Salts	700 ppm
Total Salinity	1,000 ppm
Sodium	60% of total cations

(The MPCA standards lists other chemicals not shown here. See MPCA rules and regulations for water pollutuion control).

Mn DOT contacted the MPCA during the preparation of the FEIS regarding the runoff that will leave sedimentation basin Number 2 (Fig 6-10, p 111). Although the MPCA considers the discharge a point source they will not require Mn DOT to obtain a National Pollution Discharge Elimination System permit because the distribution of ponds in the proposed drainage plan and the final sedimentation pond should allow significant settling out and permit periodic clean-up for removal of particles.

TABLE 6-12 ESTIMATED SEASONAL INCREASES IN MEAN SALT CONCENTRATIONS DUE TO CONSTRUCTION

LAKE	DRAINAGE AREA (SQ MI)	LANE MILES	SALT CONCENTRATIONS (mg/l)	
			WATERSHED RUNOFF	LAKE
GUN CLUB	1.43	1.89	111	8
SLATERS	1.17	11.93	853	541
ROGERS	0.92	4.67	340	38
HORNBEAM	0.08	1.51	1580	87
HORSESHOE	0.12	1.62	1130	121
SCHMIDT	1.40	18.62	1113	431

The MPCA has also established the criteria for the classification of intrastate waters. Some of the waterbodies and watercourses—including those in the project area—haven't been categorized as yet. For those not yet specifically categorized, one or more of the following classifications apply:

2B (Fisheries & cool or warm water sports, commercial fisheries)
2C (Rough fish, aquatic recreation)
3B (General industrial purposes with a moderate degree of treatment, except food processing)
3C (Industrial cooling or materials transport)
4A (Irrigation, without adverse effects on crops)
4B (Livestock and wildlife, without injurious effects)
5 (Navigation and waste disposal)
6 (Others)

The proposed action will not cause any classification changes of the waterbodies and watercourses in the project area.

DEICING SALT

Deicing salt is 90% or more sodium chloride by weight. Runoff from highways will seasonally have high concentrations of sodium chloride, which discharges into lakes, streams and wetlands. While it is impossible to precisely estimate chloride concentrations, it is possible to roughly determine worst case concentrations in runoff and area lakes (see Table 6-12).

Sodium chloride is the least harmful of water pollutants. Only in high concentrations is sodium chloride toxic to fish and wildlife. Lethal effects were noted on fish when concentrations of 8000 mg/1 were reached, on fish fry at concentrations of 3800 mg/1 and on invertebrates at 3000 mg/1. Adverse effects have been noted on fish eggs at concentrations of 2000 mg/1 and can be expected on wildlife at concentrations greater than 3000 mg/1. Lower concentrations of chlorides can effect the species composition of aquatic plants. Intolerant hardwater species have not been found in concentrations over 50 mg/1, while only tolerant hardwater plant species have been found in concentrations over 150 mg/1. No information is available as to the upper concentration limits of these plants. Area lakes are dominated by tolerant hardwater plants.

Table 6-12 gives worst case concentrations and assumes that all road salt applied in the watershed will enter that lake. This will not occur and actual concentrations will be less. There should be no significant impact to wildlife and aquatic biota as a result of the use of highway deicing salt.

Minimization of Harm

Until less harmful de-icers are developed, limiting the amount of salt applied to the highways will be the most effective means of minimizing the possible impacts of salt on lakes and wetlands. The Division of Highways has instituted a program under which it has attempted to cutback on the amount of salt used on highways in the State without sacrificing the safety of motorists. Since 1970, this program has resulted in a 42% decrease (5-year average) in the amount of salt used on highways in the St. Paul-Minneapolis area. In keeping with this program, the DH will apply salt on I-494 at the minimum amount that safety will allow.

The drainage system proposed for I-494 (Fig 6-10, p 111) will be another way of minimizing the effects of salt on the water quality in the project area. The ditches and storm sewers (along with lift pumps where necessary) will keep water moving through the drainage system. This will provide a flushing action and prevent a build-up of salt in the ponds.

In the flood plain, the natural springs and periodic floods will give some additional protection against the build-up of salt concentrations. High-water data obtained over a 20-year period, from 1951 to 1971, indicates that the Minnesota River and adjacent lakes flooded over 16 times. Therefore, during this time, floodwaters flushed lakes in the flood plain an average of 3 out of every 4 years.

The Minnesota River

This proposal could have three possible impacts on the quality of the water in the Minnesota River — introduce sediment and salt through drainage, introduce chemicals and oils through spills, and introduce sediment and erosion during construction. (See Construction, p 114, for discussion of the latter).

Minimization of Harm

The distribution of ponds in the drainage system will allow most sediments to settle out of the runoff prior to its discharge into the two rivers. The design of Sedimentation Basins 1 and 2 will allow longer periods of retention and permit additional settling out of sediments and periodic clean-up. To help insure that the water leaving these ponds meets local, state, and federal standards, the water in these ponds will be monitored periodically. The ponds will be constructed with moderate side slopes so that they will be conducive to the growth of aquatic vegetation, and, thus, be good habitat for waterfowl.

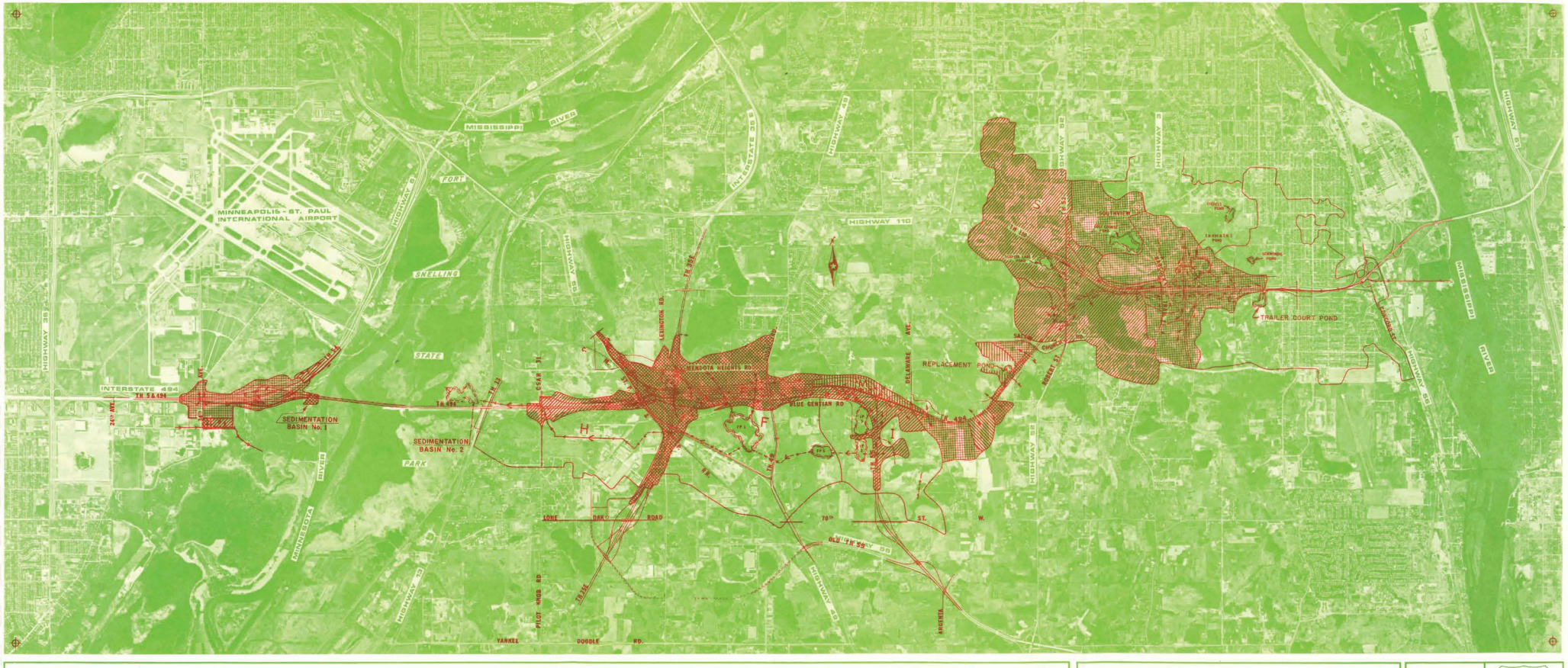
A water-monitoring program recently started in the metro region should make possible a close watch on the chloride levels in the two rivers. The United States Geological Survey (USGS), in cooperation with other agencies (including the DH), has started a program of monitoring the water quality in the rivers and in selected lakes and ponds in the project area. The USGS has monitoring stations on the Minnesota River in Fort Snelling, and on the Mississippi River in Inver Grove Heights. Thus far, the amount of chloride in the rivers at both locations and in the lakes has been below 100 ppm. De-icing chemicals from the highways in this proposal should raise the chloride level very little, if any at all. Actual effects can't be determined, however, until after the USGS compares post- and pre-construction readings.

Sedimentation Basins 1 and 2 (See Fig 6-10, p 111)will also serve as containment areas should an oil spill occur. Drainage from the proposed bridge over the Minnesota River and flood plain won't be contained in these basins, however. Instead, the runoff will be carried into downspouts that are connected to the bridge piers. The downspouts will discharge the runoff onto splash blocks at ground level. From there, it will follow the natural drainage of the area under the bridge.

A major chemical or oil spill is not likely to occur on the bridge over the river and flood plain because of the relatively flat horizontal and vertical curvature proposed for the bridge. If a spill should occur, it is the responsibility of the transport company to notify the MPCA and arrange for corrective measures to be taken. Depending on the magnitude of the spill, MPCA may send inspectors to survey the spill and recommend the implementation of clean-up procedures.

Ground Water

Since most of alignment is underlain by plastic (clayey) soils rather than granular, most precipitation will have a tendency to runoff rather than penetrate into the underlying water tables (see discussion on soils, p 26). Therefore, very little water is actually added to the ground water storage through direct penetration. The lakes and wetlands are the major areas of recharge to these underlying water tables.



DRAINAGE

N

0 1000 2000

INTERSTATE 494

FIGURE 6-10

The soils underlying the alignment immediately outside the Minnesota River Valley (on both sides) are predominantly granular and will accept water and transmit it to underlying water tables. However, because of the proximity of this portion of the alignment to the river, the near-surface water table gradient is steeply sloped towards the river on both sides of the valley (see Geologic Profile, Fig 3-2, p 27). Therefore, even through this portion of the alignment is technically over recharge areas, in reality very little water is actually added to storage, as most of it moves underground towards the valley and then into the river.

Since most of the soils beneath the alignment are somewhat clayey, zones of reduced permeability may be encountered. These more impermeable zones could cause some localized perched ground water; however, drainage of these pockets will be rapid and won't adversely effect the overall ground water pattern.

Flows to Lakes, Wetlands, and Wells

Principal lakes in the project area are Gun Club, Lemay, Rogers, Hornbeam, Horseshoe, and Schmidt Lakes. Gun Club Lake, a spring fed lake, is located in the flood plain near the Minnesota River, just south of where proposed I-494 will cross. The roadway fill and embankment for the section of highway through the flood plain has been in place since 1973. This construction hasn't had any impact on the level of the lake.

The sections of alignment adjacent to Lemay, Hornbeam, and Horseshoe Lakes are above the lake levels and the water table. Therefore, proposed I-494 won't effect the flow of ground water to these lakes. A portion of the proposed I-494 and I-35E interchange will be about 500 feet away from Rogers Lake and will be below the level of the lake. A detailed study of Rogers Lake and the surrounding water table concluded that the interchange will neither drain the lake nor interfere with ground water recharge to it.

The highway construction will not effect the underground supply of water to wells. Wells in the project area bottom at a much greater depth than the highway excavation. (No wells are within 200 ft. of the alignment.)

Effects of Fertilizers and Pesticides

The DH uses granular fertilizers to re-establish ground cover disturbed during construction. Fertilizers promote a dense, vigorous turf in a short time, minimizing erosion and conserving moisture for plant use. The fertilizers used are mixtures of nitrogen, phosphorous, and potassium. The exact kind and rate of application depends on the deficiencies of the soil and the food requirements of the ground cover.

Some damage to the environment from fertilizers could occur when the fertilizer leaches out of the topsoil under conditions of heavy moisture. Theoretically, the fertilizers, with the aid of surface drainages, can work its way into the ground water. The leaching only occurs, however, when more fertilizer is present than what the soil and plant life can use.

The DH uses herbicides, fungicides, and pesticides on turf, plants, and trees within the highway right of way. Herbicides used are 2 and 4-D, and 2, 4, and 5-T — all formulated into an anti-drift emulsion.

Minimization of Harm

As nearly as possible, the DH uses only the amount of fertilizers that the topsoil and ground cover requires. Thus, only a small amount of leaching occurs. For the leaching that does occur, a covering of mulch applied after the fertilizer confines it to local areas. In using herbicides, the Department sprays only problem areas. Use of invert sprayers helps eliminate wind drift. Not spraying on days of high wind velocity and using invert sprayers also helps eliminate drifting.

CONSTRUCTION

A number of impacts might occur during the actual construction of I-494 and the other highways in this proposal (aside from direct impacts on vegetation, wildlife, and land). These might be pollution of the air and water, erosion, and disruption to local traffic. This section discusses how these impacts might occur and the measures that would be taken to minimize harm.

In the Flood Plain

A substantial amount of the work in the flood plain has been done already, under contracts let prior to the determination of the need for an EIS (see History, Development, and Current Status, p 15, and Flood Plain, p 104).The bridge across the Minnesota River is the remaining major construction in the flood plain.

A sand blanket, for supporting the equipment during the bridge construction, has already been placed. Also, the roadway embankment — extending for .7 miles, from about just east of the Minnesota River to TH 13 — is already inplace. Placing the sand blanket and roadway embankment resulted in little or no negative impacts (see discussion on p 87). With the sand blanket already in place, very little additional haul-road or sand-island work is contemplated.

Because of the high water table in the flood plain, construction of the piers for the bridge could mean contamination of groundwater through sedimentation and erosion. Coffer dams will be constructed, however, and de-watering techniques used to minimize any harm.

Suitable special provisions will be included in the contract to insure that the pumped water and excavated material from the coffer dams will not adversely affect the river. Coffer dams will not be constructed in the main river channels.

The type of bridge structure and the method used to erect it will determine the necessity of falsework bents. Thus, far, the type of bridge structure hasn't been determined.

Any falsework placed in the river will be subject to US Coast Guard Regulations. Special Contract Provisions will require the contractor to adhere to these regulations. The pier locations and plans for the proposed bridge shall be approved by the Commandant, US Coast Guard (33 USC Section 525).

During construction, potentially harmful materials such as gasoline and oil will be kept in confined areas outside the floodway* to prevent any spillage from entering the water bodies.

(For discussion on Schmidt Lake, see Schmidt Lake, p 101).

Elsewhere

All applicable regulations of pollution control and fish and wildlife agencies relating to the prevention and abatement of pollution shall be complied with during hauling and construction operations. The Minnesota Department of Transportation's construction specifications require the contractor to become familiar with local conditions and regulations before starting construction.

Construction operations, including operations in borrow pits or waste disposal areas and the construction of haul roads, shall be scheduled and conducted so as to minimize soil erosion and prevent silting or muddying of public waters.

Frequent fording of live streams with hauling equipment will not be permitted. Temporary bridging will be used where an appreciable number of stream crossings are necessary. Waterways will be cleared as soon as possible after construction.

Ordinances regarding working hours — or types of construction that can be performed during certain hours — sometimes vary from city to city. Contractors will be required to comply with these regulations.

Unrecorded Archaeological

The Minnesota Historical Society (MHS) surveyed the I-494 project for archaeological remains in 1968, 1969, 1970, and 1975. The MHS concluded that the proposed action will have no affect upon any properties possessing historical, architectural, archaeological, or cultural value that are included in — or are eligible for inclusion in — the National Register of Historical Places (see Section X, Coordination, Minnesota Historical Society's letter, p 129).

If construction operations uncover any unrecorded archaeological remains, the Minnesota Department of Transportation's construction specifications require that the contractor restrict or suspend operations in the immediate area of the discovery until the State Historical Society can study the discovery, determine its value, and develop a method of preserving it.

Borrow Pit Treatment

Although excavated material will be used on the project whenever possible, sites outside of the construction limits may be needed for obtaining additional fill material. Upon completion of the project, these sites will be left neat and in as near a natural condition as possible. Restoration will include cleaning, shaping, replacement

* An elevation that the Minnesota Watershed District has established as 1 ft above the 100-year flood level.

of topsoil, and establishment of vegetative cover on all areas disturbed by construction operations.

Construction Plants

If a hot mix paving plant or similar operation is required for this project, local air pollution requirements will be adhered to. Water containing sediment from aggregate wash operations will be treated to the extent that the final sediment content will meet the specified effluent standards that the Minnesota Pollution Control Agency has set. All necessary permits will be obtained and complied with. Wash water or wastes from concrete mixing operations will not be allowed to enter live streams. All applicable regulations of pollution control and fish and wildlife agencies relating to prevention and abatement of pollution shall be complied with in the performance of the contract work.

Pollution Control During Construction

Precautionary measures will be utilized during the construction of this project to prevent air and water pollution. Controls over contractor's construction operations will be provided by the Division of Highways' "Standard Specifications for Highway Construction" and other regulations in effect at the time of construction. Additional controls relating to the prevention of air and water pollution will be included in the contract.

The contractor will be required to incorporate all permanent erosion control features into the project at the earliest practicable time. Temporary pollution control measures will be used to correct conditions that develop during construction that were not foreseen during the design stage; that are needed prior to installation of permanent erosion control features; or that are needed temporarily to control erosion that develops during normal construction practices, but are not associated with the permanent control features on the project. Some examples of temporary control devices are mulches, slope drains, dikes, sediment basins, and turf establishment. Temporary grasses will be quick growing species suitable to the area, that will provide temporary cover but will not later compete with the grasses sown for permanent cover.

Where erosion is likely to be a problem, clearing and grubbing operations will be so scheduled and performed that grading operations and permanent erosion control features can follow immediately thereafter if the project conditions permit; otherwise, temporary erosion control measures may be required between successive construction stages.

The engineer will limit the area of excavation, borrow and embankment operations in progress commensurate with the contractor's capability and progress in keeping the finish grading, mulching, seeding, and other such permanent erosion control measures current in accordance with the accepted schedules. Should seasonal limitations make such coordination unrealistic, temporary erosion control measures will be taken immediately to the extent feasible and justified. For example, if river bridging work is stopped for the winter, the exposed cuts or fills for approaches will be riprapped to protect against erosion during spring runoff and resulting high water.

The engineer may increase or decrease the amount of surface area of erodible earth material that may be exposed at one time by clearing and grubbing, excavation, borrow, and embankment operations, as determined by his analysis of project conditions. For example, two separate areas could be opened simultaneously if two fleets of equipment were available.

Disruptions to Traffic

Construction work will probably cause some disruptions to local traffic patterns. Since the project will extend over a long area (froms 24th Av to the Mississippi River, about 11.5 miles), the actual construction will probably be done under several separate contracts. The construction will be scheduled in such a manner that alternate routes around construction areas can be developed. Vehicular access to adjacent properties will be maintained during construction.

The Minnesota Department of Transportation's "Standard Specifications for Highway Construction" requires contractors to conduct their operations in a way that will cause the least obstruction to traffic. Contractors are also required to provide for the safety of the general public as well as residents abutting the highway. When necessary, contractors will provide temporary facilities to serve pedestrian travel over or through obstructions at public walkways. Open excavations will be fenced off and posted with warning signs.

Contractors are required to give the chiefs of the local fire and police departments sufficient notice to arrange for routing of emergency vehicles before it becomes necessary to blockade a street. They must also keep them informed as to the status and removal of street blockades affecting emergency travel. Access to fire hydrants will not be obstructed without the approval of the local fire chief.

The Independent School District No 197, St. Thomas Academy (and Visitation Academy), and the Metropolitan Transit Commission (MTC) have bus routes in the project area. These are as follows —

— Independent School District: TH's 13, 49, 52, 55; and County Roads 18 (Salem Church Road), 31 (Pilot Knob Road), 43 (Lexington Av), 63 (Delaware Av), and Blue Gentian Road.

— St. Thomas Academy: All stops are north and northwest of the proposed highway, in St Paul and Minneapolis.

— MTC: Along TH 13 and Lexington Av

Disruptions will occur to the school district's routes along TH's 49, 55, County Road's 18, 43, 63, and Blue Gentian Rd. All the disruptions will not occur at one time, and only one — the Lexington Av route — will be permanent. After construction, Lexington Av will not extend through the I-494 and I-35E interchange area. This will also result in an impact on the MTC's route along Lexington Av. St Thomas Academy's routes will not be impacted.

The School District and the MTC could possibly maintain the Lexington Av route by using TH 55 to pass through the interchange area, entering, or exiting from, Lexington Av in the vicinity of the interchange.

The proposed construction should not mean any increase in costs for either the school district's or the MTC's bus operations in the project area.

REFERENCES

Geology and Groundwater Data for I-494, Office of Materials, Central Office, Mn DOT, Division of Highways, St. Paul, MN, September 1974.

I-494 Water Quality Report, District 9 Hydraulics Section, Mn DOT, Division of Highways, Oakdale, MN, August 1976.

Drainage Report for I-494, Central Office Hydraulics Section, Mn DOT, Division of Highways, St. Paul, MN, April 1974.

Right of Way Study for I-494, District 9 Right of Way Section, Mn DOT, Division of Highways, Oakdale, MN, August 1976.

Noise Analysis Report for I-494, District 9 Resources Unit, Mn DOT, Division of Highways, Oakdale, MN, July 1976.

Air Analysis Report for I-494, District 9 Resource Unit, Mn DOT, Division of Highways, Oakdale, MN, August 1976.

Vegetation Land Use Wildlife Assessment for I-494, Office of Environmental Services, Mn DOT, Division of Highways, St. Paul, MN, June 1976.

IMPACTS OF THE NO-BUILD ALTERNATE

The No-Build Alternate would have a number of impacts upon the project area and region. It would affect (1) the local and regional transportation system; (2) industrial and commercial development; (3) residential development; (4) the tax revenues in several of the municipalities; and (5) joint DH and municipal planning.

ON TRANSPORTATION SYSTEM

The No-Build Alternate would increase the highway improvement and maintenance costs for the counties and local municipalities. In many cases, county highways and local municipal streets would have to be up-graded to accommodate the traffic from the companies already in the study area. The proposed county highway and local street systems, designed to complement the proposed interstates, would have to be revamped. This would result in a considerable upending to several of the municipalities' street plans.

The No-Build Alternate would be contrary to the region's planned transportation system. In northern Dakota County, the completed and proposed sections of I-494 and I-35E and TH's 110, 55, 49, 52, 3 and 56 form part of the proposed transportation system. The system has as its basis the principle of well-spaced arterials sharing the traffic load. Incomplete links on one segment of the system means traffic complications on completed portions elsewhere. Complications already exist on the study area roads which combine to serve as the links between the completed portions of I-494 (see Deficiencies on Project Area Highways, p 6).

With the No-Build Alternate, congestion on study area roads will increase. As the suburbs northeast and east in the metropolitan area become more industralized and heavily populated, the number of workers commuting through the beltline corridor will increase proportionately. (Plans are already underway for industrial parks and regional centers in these areas.) Additional residential areas in the northeastern and eastern suburbs will also mean an increase in travel to the high activity centers — the sports complex, the Fort Snelling State Park, and the Airport — across the Minnesota River near Bloomington.

ON INDUSTRIAL AND COMMERCIAL DEVELOPMENT

Of the No-Build's negative impacts on the planned development in the project area, that on industrial and commercial development would be greatest. An adequate transportation system is a primary prerequisite for the establishment of an industrial park or a major diversified center. For example, Eagan has planned their industrial parks to be serviced from all directions by major highways, including proposed Interstates 494 and 35E. Eagan estimates that as much as 1/3 of its planned industrial development would not occur if the interstates are not built.

This reduction would mean a substantial financial loss for Eagan. Eagan has installed its water and sewer system in the proposed industrial park areas, basing the capacity of the system on the existing and proposed land use levels. A large drop in the eventual number of connectors to the system would mean a considerable drop in user revenue. This drop would impair the city's ability to meet yearly bond service charges. The city and county would also sustain a substantial tax-revenue loss.

ON RESIDENTIAL DEVELOPMENT

In Mendota Heights and Inver Grove Heights, the effects of the No-Build Alternate will be somewhat different. Both cities have zoned a large amount of land residential and only a small amount industrial and commercial, considerably less than Eagan. The excellent topography and location of both cities makes them highly desirable for residential development. Thus far, however, only a small amount of the available residential land in both cities has been developed.

The No-Build alternate would have a negative effect on proposed residential development in both cities. Although most residents in the region are aware of the excellent quality of life that northern Dakota County offers, they are also aware of the complicated traffic problems on the highways in this section of the county. The traffic tieups and accidents on the Mendota Bridge, TH 55, and TH 110 are common, as are the high number of fatalities on I-494 near the Mississippi River. These conditions will be deterrents to residential expansion, should the No-Build alternate be adopted.

OTHER CONSIDERATIONS

Maintaining Semi-Rural Atmosphere

Adapting the No-Build would mean limiting the amount and rate of development in northern Dakota County. Little future development in Eagan, Mendota Heights, and Inver Grove Heights would mean the preservation of the semi-rural atmosphere.

Lower Land Values

The No-Build alternate would mean lower land values in Northern Dakota County, mainly in the industrial parks of Eagan, Mendota Heights, and Inver Grove Heights. The demand for land would be less. This in turn would mean slower land appreciation rates.

No Immediate Tax Loss

On a short term basis, the no-build would be beneficial to local tax rolls. Existing property would continue as sources of tax revenue.

No Visual Intrusion

The No-Build alternate would mean the absence of the visual intrusion that would result from the new highway.

No Noise & Air Pollution

The no-build would mean the absence of noise and air pollution along the preferred corridor. It's important to note, however, that some of these impacts would merely transfer to existing highways, mainly TH's 55, 5, and 110. Under the No-Build condition on these existing highways, noise levels are predicted to increase by from 3 to 5 dBA over the existing levels. Approximately 155 existing residential units would be affected by this increase. Air quality would generally improve on existing highways in the project area due to changing emission standards for road vehicles. (See Table 6-7, p 83).

No Impact on Wetlands, Undeveloped Land

The 680 acres of openland, 113 acres of woodland, and 32 acres of lakes, rivers, and wetland impacted under Alt B3 would not be impacted under the No-Build. Thus, the water quality and habitat value of these areas would be preserved. Higher traffic volumes on TH 110 as a result of the No-Build could lead to higher pollutant concentrations and have an effect on the water quality, however.

THE PROBABLE ADVERSE EFFECTS WHICH CANNOT BE AVOIDED

SECTION VII THE PROBABLE ADVERSE EFFECTS WHICH CANNOT BE AVOIDED

This Section reiterates the probable adverse impacts which can't be mitigated to acceptable levels. (Section VI, Probable Impacts, discusses these impacts in more detail).

The proposed construction will impact 15 wetlands, displacing eight totaly and seven partially.. The 15 wetlands total 71.4 acres. Of these, 21.1 acres (30%) will be filled. Ponds constructed for highway drainage will provide 12 acres of new wetland, however. Thus, the net loss in wetlands will be about 9.1 acres. The habitat value for wildlife and the aesthetic value of these 9.1 acres will be lost.

Additional unavoidable adverse effects of the proposal will be the impact on 113 acres of woodland and 680 acres of openland.[1] A companion loss will be the reduction of wildlife habitat.

Another unavoidable impact will be the 41 residences that may not be protected with noise abatement measures. (See Noise Impacts, p 86).

[1] The acreage falls within the highway right of way; it's difficult, however, to compute in the preliminary planning stages how much of this will actually be lost through construction — perhaps a little more than half.

THE RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES OF MAN'S ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

Short Term Effects

Long Term Effects

SECTION VIII SHORT TERM USES VS LONG TERM PRODUCTIVITY

SHORT TERM EFFECTS

Short term effects of the proposed action would include the displacement of homes and businesses and the disruption of established access patterns for drivers. The proposed action will alter topography and remove some vegetation and wildlife habitat. A short term loss in the tax base of the communities involved will occur as a result of right-of-way acquisitions.

LONG TERM EFFECTS

Long term effects of the action would include a decrease in traffic congestion and improved accessibility for the area. This, in turn, will encourage residential, commercial and industrial growth and provide people with a wider array of cultural, social, economic and employment opportunities.

New tax base created by the expected growth will more than offset the short term losses due to right of way acquisition. This will be a long term benefit to the communities involved, especially Eagan and Mendota Heights.

Completed I-494 will help eliminate the traffic tieups at the approach to the Mendota Bridge and also remove some of the traffic from TH's 110 and 5. The improved transportation route will be economically beneficial to both the local and Metropolitan Area.

IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

Land Commitment

Surface Resources

Manpower And Materials

SECTION IX IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

LAND COMMITMENT

Highway facilities commit land to a use that is difficult to change or reverse. The land that will be used for this project will be considered permanently committed to a transportation corridor.

SURFACE RESOURCES

Surface resources such as trees, forage, animal habitat, developed and undeveloped land etc. will generally be irreversibly committed to the project.

MANPOWER AND MATERIALS

The manpower, money, fuel and construction materials used in the design, construction and maintenance of the facility, will be irretrievable.

COORDINATION

The Division of Highways (DH) prepared the Alternate B1 and B2 design in 1971. Since then the DH has shown the design at frequent meetings with the public and private sectors of the communities involved, both at the DH Office in Oakdale, Mn, and locally in some of the communities in the project area. Some of the formal showings of the alternates were as follows:

Informational Meeting, 12 March 1974, Eagan City Hall (21 attending)
Informational Meeting with Northern Dakota County Chamber of Commerce, 29 October 1974
Informational Meeting and Public Hearing for Proposed I-35E, Metcalf Jr. High, City of Eagan, 22 July 1976 (about 500 attending)
Informational Meeting and Public Hearing for Proposed I-494, Henry Sibley Sr. High, Mendota Heights, 25 August 1977, (about 850 attending).

Coordination on the metropolitan level has included meetings with representatives of the Metropolitan Council (MC), the area's A-95 Clearinghouse and 3C Planning Agency, and the Interstate Study Committee, formed in 1975 to review and study unfinished sections of the Interstate System in the Metro region. Other coordination includes the following:

Meetings and field walks with the Minnesota Department of Natural Resources (numerous meetings, from inception of highway planning to 1978) Contact with Minnesota Historical Society and the Minnesota Pollution Control Agency (see Leters in this section. Meetings with the US Department of Fish and Wildlife Service (several meetings, 1976-1978) Contact with the Heritage, Conservation, and Recreation Service, US Dept of Housing and Urban Development, US Department of Agriculture, US Corp of Engineers, US Coast Guards and US Environmental Protection Agency.

A meeting of the DH and US Fish and Wildlife Service (USFWS) on February 1978 dealt with the proposed Minnesota Valley National Wildlife Refugee (MVNWR). A portion of the area proposed for the MVNWR is located immediately south of the proposed I-494 crossing in the western portion of the Minnesota River Valley. The best method of including highway needs (not just I-494) in the comprehensive plans for the MVNWR was one of the main issues discussed. Since neither the DH nor the USFWS has obtained land for their proposals in this area, another purpose of the meeting was to ensure that no conflicts develop in the agencies' planning or land acquisitions. The DH and USFWS plan additional coordination on these issues.

During the early coordination, the US Corps of Engineers (USCE) and the US Coast Guard (USCG) reviewed preliminary copies of the Draft and Final EIS's for I-494. Both agencies suggested that certain information be added to the DEIS, and the USCG suggested a minor change in the FEIS. These suggestions were considered in the Draft and Final EIS's. Letters from the USCE and USCG appear on pages 132, 133, 135, and 136 of this section

The USCG indicated in their comments that naviagation span piers for the bridge over the Minnesota River should be located out of the water. Details of the pier locations will be worked out through additional coordination with the involved agencies, including the USCG. All navigational requirements will be met.

MINNESOTA HISTORICAL SOCIETY
690 Cedar Street, St. Paul, Minnesota 55101 • 612-296-2747

13 February 1976

Mr. C. P. Kachelmyer
Preliminary Design Engineer
612E Highway Building
St. Paul, Minnesota 55155

Dear Mr. Kachelmyer:

RE: S.P. 1985, 1986, 2285 (T.H. 494)
From 24th Ave. So. In Bloomington
To Mississippi River at South
St. Paul. In Bloomington,
Eagan, Mendota Heights, Sunfish
Lake, Inver Grove Heights and
South St. Paul

Both the Survey and Planning section and the Highway Archaeology section of the Minnesota Historical Society have reviewed the project described above pursuant to the State Historic Preservation Officer's responsibilities under the National Historic Preservation Act of 1966, Executive Order 11593, and Advisory Council Procedures 36 CFR 800.

This review analyzed the project area for the existence of historic, archaeological, architectural, and cultural sites which are on or are eligible for inclusion on the National Register of Historic Places. Neither sites on nor sites eligible for inclusion on the Register have been found in the area. Therefore, no sites within the jurisdiction of any of the laws and regulations mentioned above will be affected by the proposed project.

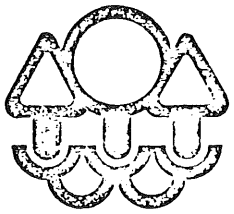
So as to avoid any later questions I am anxious particularly to point out that neither the Mendota Historic District nor the Fort Snelling Historic District will be affected by the highway described above.

Thank you for your continued attention to historic preservation values in your planning process.

Sincerely,

Russell W. Fridley
State Historic Preservation Officer

RWF/fr



Minnesota Pollution Control Agency

November 12, 1976

Mr. Jim Harrington
Commissioner
Department of Transportation
Highway Building, Room 411
St. Paul, Minnesota

Dear Mr. Harrington:

The staff of the Division of Air Quality has reviewed the Air Quality Report for I-494 from 24th Avenue South to the Mississippi River. Within the scope of this analysis, this project is not inconsistent with the State Implementation Plan.

Thank you for the opportunity to review this Report. If you have any questions, please contact Brad Beckham (296-7358).

Sincerely,

Peter L. Gove
Executive Director

PLG:es

1935 West County Road B2, Roseville, Minnesota 55113
Regional Offices • Duluth / Brainerd / Fergus Falls / Marshall / Rochester / Roseville
Equal Opportunity Employer

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

NOV 29 1976

Mr. L. V. Pearson
Acting Road Design Engineer
State of Minnesota
Department of Highways
St. Paul, Minnesota 55155

Dear Mr. Pearson:

We have completed our review of the Air Quality and Noise Reports for I-494 from 24th Avenue in the City of Bloomington to the Mississippi River in the City of South St. Paul, Hennepin and Dakota Counties, Minnesota. Your letters of October 6, 1976, requested our views and comments on the adequacy of these documents and the environmental impact of the proposed project.

Both the air quality and noise report contain sufficient information to assess the environmental impact of the project. Based on these two reports, we do not anticipate any adverse environmental impacts regarding air quality and noise. The construction of the proposed highway segment should improve the air quality in the metropolition area by providing a bypass around the Twin Cities central business district. In regard to the noise impacts, we suggest the communities through which this highway segment passes zone land adjacent to the highway for noise tolerant uses. Land use planning should be done in anticipation of the highway's construction in order to preclude adverse impacts upon residential development. The consideration of noise barriers for areas where development has occurred is encouraged and supported by this Agency.

We appreciate the opportunity to review these two documents. If you have any questions in regard to our comments, please contact Mr. Bill Franz at 312-353-2307.

Sincerely yours,

Gary A. Williams

Gary A. Williams
Chief,
Environmental Review Section

DEPARTMENT OF THE ARMY
ST. PAUL DISTRICT. CORPS OF ENGINEERS
1135 U. S. POST OFFICE & CUSTOM HOUSE
ST. PAUL. MINNESOTA 55101

REPLY TO
ATTENTION OF:
NCSCO-S(SF 77-196)

2 May 1977

Mr. Fred Behrens
Federal Highway Administration
Suite 490, Metro Square Building
St. Paul, Minnesota 55101

Dear Mr. Behrens:

The following comments are in reply to your letter dated 14 April 1977 with attached pre-draft environmental impact statement (EIS) for proposed construction of Interstate Highway 494 in Hennepin County and reconstruction of a portion of Trunk Highway 55 in Dakota County.

1. Section 10 and 404 permits will be required for the proposed project.

2. We concur that the Federal Highway Administration serve as the lead agency for the development of the EIS.

3. As a result or our review of the pre-draft EIS, we recommend:

Impacts of the Proposed Action

a. The discussion should identify species of wildlife other than waterfowl and gamebirds (e.g., amphibians, reptiles, and mammals) which depend on the wetland habitat which is proposed to be filled.

b. Do the affected wetlands and uplands provide habitat for any of the species, especially reptiles and amphibians, listed in the Minnesota Department of Natural Resources "Special Publication No. 104" on species in need of special consideration?

c. The discussion of Schmidt Lake should be expanded to include impacts on its hydrological characteristics and present and potential uses.

Alternatives to the Proposed Action

a. In the draft EIS, the aerial photographs for all alternatives should locate all fills in wetlands and lakes, and for bridge crossings of waterways.

b. The reader's understanding of the factors involved in selecting the preferred alternative would be aided by a summary table comparing the acreages, land use types, and wildlife habitat affected by each alternative.

We look forward to receiving the draft EIS for review.

Sincerely,

Wm. L. Goetz

WM. L. GOETZ
Chief, Construction-Operations
Division

DEPARTMENT OF TRANSPORTATION
UNITED STATES COAST GUARD

MAILING ADDRESS:
(obr)
COMMANDER
SECOND COAST GUARD DISTRICT
FEDERAL BLDG
1520 MARKET ST
ST LOUIS, MO 63103
Tel. 314-425-4607
FTS 279-4607

16590/3.9 MinnR
23 May 1977

Mr. E. Dean Carlson
Division Administrator
U. S. Department of Transportation
Federal Highway Administration, Region V
Suite 490, Metro Square Building
St. Paul, MN 55101

Re: S.P. 2785-116, Bridge No. 9217, Federal Project No. 494-4(24)241, I-494 over the Minnesota River, Mile 3.9, near Fort Snelling, Minnesota

Dear Mr. Carlson:

This is in reply to your letter of 22 April 1977 forwarding copies of the preliminary Draft Environmental Impact/Section 4(f) Statement for the referenced project.

As you know, the Minnesota Highway Department application for an extension of time is being held in abeyance pending receipt of the Final Environmental Impact/Section 4(f) Statement. This Statement must be submitted with the application for an extension of the time for starting and completing this project. This is the only Coast Guard Permit action required.

Our review of the preliminary Draft Statement indicates that more information is needed concerning the environmental impact of constructing the proposed bridge. The probable impact of procedures for constructing cofferdams, sand islands, haul roads, falsework bents and similar temporary structures should be discussed.

Since the plans for the bridge were approved several years ago by the Corps of Engineers, navigation on the Minnesota River has increased significantly. Therefore, we believe that the navigation span piers should be located out of the water at moderate to high river stages.

We would point out that in the interest of marine safety, the probability of a tow colliding with a bridge pier cannot be overemphasized since the consequence of such accident could result in loss of life, fire or pollution. Further, we believe that bridges should be constructed so as to present the least possible hazard to navigation.

We would be pleased to accept the Federal Highway Administration as lead agency for this project.

The opportunity to comment on the proposed project is appreciated.

Sincerely,

S. W. THOROUGHMAN
Chief, Bridge Branch
Second Coast Guard District
By direction of the District Commander

UNITED STATES DEPARTMENT OF AGRICULTURE
SOIL CONSERVATION SERVICE

SUBJECT: LIM - Prime and Unique Agricultural Lands DATE: May 11, 1977

TO: Mr. Richard E. Luhrsen
Project Manager
Minnesota Department of Transportation
District 9
3485 Hadley Avenue North, Box 2050
North St. Paul, Minnesota 55109

I have reviewed the information sent to me in regard to the land classification on project 319 S.P.1985 I-494 4 (f) and 6 (f) involvement Fort Snelling State Park and find that there is no Prime or Unique Agricultural land in the project area. Therarea is all in wildlife land and is part of the Minnesota River Flood Plain.

Sincerely,

Jerome E. Schwarz

Jerome E. Schwarz
District Conservationist
U,S, Soil Conservation Service
Townsedge Shopping Center
Farmington, Minn. 55024

DEPARTMENT OF THE ARMY
ST. PAUL DISTRICT, CORPS OF ENGINEERS
1135 U. S. POST OFFICE & CUSTOM HOUSE
ST. PAUL, MINNESOTA 55101

REPLY TO
ATTENTION OF:

NCSED-ER

25 July 1978

John S. Bowers
Assistant Division Administrator
and Engineering Coordinator
U.S. Department of Transportation
Federal Highway Administration
Region 5
Suite 490, Metro Square Building
St. Paul, Minnesota 55101

Dear Mr. Bowers:

Per your request of 28 June 1978, we have reviewed the preliminary final environmental impact statement on the proposed 11-mile completion of I-494. We find that our earlier comments have been adequately addressed and have no additional comments at this time.

Thank you for the opportunity to review this statement. We look forward to receipt of the final environmental impact statement and to continued close coordination.

Sincerely,

Roger G. Fast

ROGER G. FAST
Chief, Engineering Division

DEPARTMENT OF TRANSPORTATION
UNITED STATES COAST GUARD

MAILING ADDRESS:
COMMANDER (obr)
SECOND COAST GUARD DISTRICT
1430 OLIVE STREET
ST. LOUIS, MO 63103

Tel. 314-425-4607
FTS 279-4607

16590/3.9 Minn R

JUL 10 1978

Mr. John S. Bowers
Assistant Division Administrator
and Engineering Coordinator
Federal Highway Administration, Region 5
Suite 490, Metro Square Building
St. Paul, MN 55101

Re: I-494-4( ), Mile 3.9, Minnesota River

Dear Mr. Bowers:

Thank you for forwarding two copies of the preliminary Final Environmental Impact Statement for proposed Federal aid Project I-494-4( ). We have reviewed the Statement; the following paragraphs will comment on our area of interest.

Minnesota's application for a Coast Guard Bridge Permit should be accompanied by two copies of the Final 102(2)(c)/4(f) Statement.

It is suggested that the paragraph at the top of page 113 be changed to read:

> Any falsework placed in the river will be subject to approval of the U. S. Coast Guard. Special Contract Provisions will require the contractor to adhere to the conditions of approval.

The reason for this suggested change is that U. S. Coast Guard Regulations are the regulations that regulate the Coast Guard and do not pertain to falsework.

We believe that the statement: "MnDOT will determine the width of the channel and location of the piers using the procedures outlined in the "FHWA Technical Advisory, T5140.2, February 17, 1978. Subject: Navigation Channel Width in Bends." that is proposed for inclusion on page 113 is inappropriate and misleading. The statement that the U. S. Coast Guard has endorsed the methodology presented in FHWA Technical Advisory, T5140.2 is incorrect. Retraction of that statement has been requested by the Coast Guard. It would be appropriate to change your proposed statement to read, "The location and plans of the proposed bridge shall be approved by the Commandant, U. S. Coast Guard (33 USC Section 525)". The U. S. Coast Guard is the federal agency charged with responsibility for providing navigational input into environmental impact statements for federal projects. Therefore, if the "Steps to Minimize Harm" section of the EIS is to properly reflect steps to be taken to minimize harm to prospective navigation, we suggest reference to our letter of 23 May 1977, page 131 of the EIS, which represents the navigational input into the Draft EIS.

We will not need to review the pre-Final Section 4(f) Statement.

The opportunity to review this preliminary Final EIS is appreciated.

Sincerely,

S. W. THOROUGHMAN
Chief, Bridge Branch
Second Coast Guard District
By direction of the District Commander

United States Department of the Interior
FISH AND WILDLIFE SERVICE
IN REPLY REFER TO:
St. Paul Field Office
538 Federal Building and U.S. Court House
316 North Robert Street
St. Paul, Minnesota 55101

31 MAY 1978

Charles E. Burrill, District Director
Minnesota Dept. of Transportation - District 9
3485 Hadley Ave. North, Box 2050
North St. Paul, Minnesota 55109

Dear Mr. Burrill:

This letter is in reference to the May 9, 1978 meeting held to review proposed I-494's impacts on wetlands and vegetation in Dakota County and to discuss the mitigation measures proposed by the Department of Transportation (DOT). It was requested that the Fish and Wildlife Service provide a written evaluation of the impacts of construction and mitigation measures developed to offset resultant negative effects on natural resources.

Any alignment of I-494 through Northern Dakota County would adversely affect wetland basins and existing woodlots by the grading needed for roadway and right of way construction. Therefore construction design should minimize impacts on the Minnesota River floodplain, upland woodlots and wetland basins to provide protection, insofar as possible, for existing resources.

At the May 9, 1978 meeting it was indicated that approximately 113 acres of woodland would be removed and 22 acres of wetlands Type II-VI (U.S. FWS Circular 39) would be filled for I-494 construction. Although a substantial acreage of productive wildlife habitat is still affected, we note that these figures are lower than those originally presented in the Draft Environmental Impact Statement. Several construction features to mitigate for wetland and woodland habitat loss have been developed by the DOT, Office of Environmental Affairs. These construction features reflect some of the recommendations made in our review of the DEIS. Inclusion of the features the Office of Environmental Affairs developed for mitigation would result in a project acceptable to the Fish and Wildlife Service. These design features for mitigation are:

1. Improving 12 acres of wetlands Type II and VI to Types III and IV by increasing the amount of standing water in the wetland basin.

2. Creating an additional 17 acres of wetland habitat by proper construction of ponding areas for highway runoff.

3. Protecting a 5 acre wetland by including the entire basin in the highway right-of-way.

4. The use of design features where I-494 impinges on Schmidt Lake to encourage development of emergent vegetation more suitable for wildlife use. Reference to this activity should be changed from wetland creation to shoreline habitat enhancement.

5. Vegetative planting between the railroad track and Highway 13 to encourage deer use of this area as a travel lane and discourage crossing the newly constructed I-494 in the Minnesota River Valley.

6. Placing brush piles from shrubs cleared during construction in the right-of-way of the Minnesota River Valley to provide cover for wildlife.

7. Using prairie grass within the right-of-way of I-494.

In the view of the Fish and Wildlife Service, the project will comply with Executive Orders 11988 and 11990 if the above measures are incorporated into the final design.

These comments have been prepared under the authority of and in accordance with provisions of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C.661 et seq.) and are consistent with the intent of the National Environmental Policy of 1969. Please keep us informed as project plans develop.

Sincrerely,

Richard F. Berry

Richard F. Berry
Field Office Supervisor

STATE OF
MINNESOTA
DEPARTMENT OF NATURAL RESOURCES
Metro Region Waters, 1200 Warner Road, St. Paul, MN 55106

June 27, 1978

Mr. John Sandahl
Minnesota Dept. of Transportation
District 9
3485 Hadley Avenue North
North St. Paul, MN 55109

RE: 494 Wetland Evaluation

Dear Mr. Sandahl:

I have reviewed the proposed wetland evaluation and mitigation measures with the various disciplines and provide the following comments for your consideration:

A. We basically concur with the analyses of wetland types and acreages to be impacted by the freeway construction.

B. The mitigation measures to be implemented would appear to result in equal or greater waterfowl habitat areas by virtue of the increased number of Type IV and V wetlands. The actual design of such basins will significantly dictate the habitat value of each. Providing fringe aquatics, islands, and fringe upland in the final design will maximize habitat.

C. Schmidt Lake. The mitigative measures for the filling of portions of the lake were addressed during the original permit hearing. However the dredging measures proved unfeasible, therefore other measures must be considered.

The special sloping you advocate may permit additional fringe emergence, of benefit to the lake to recover some past vegetation. However portions of the basin will still be filled and another area isolated from the main body. These areas will no longer serve their intended resource purposes. As such, the following should be evaluated for consideration:

1. The flood storage requirements for the basin and the degree of storage reduction resulting from the filling; alternatives to storage replacement.

2. Analyses of the potential for "mud wave" development during filling for roadway as well as side slope embankment fill and means to be implemented to eliminate or minimize same.

3. The lake may have a potential for aeration thereby improving the public benefits to the lake and mitigating to a great degree the adverse impacts from filling.

In summary, we believe the impacts to existing wetlands will be mitigated equal to or greater than what exists presently if proper design and construction is implemented. The mitigation to Schmidt Lake should be analyzed further and will be detailed during the DNR permitting process.

If you have any questions please advise.

Yours truly,

Ronald D. Harnack,
Regional Hydrologist

RDH:ls

COMMENTS AND RESPONSES

SECTION XI COMMENTS AND RESPONSES

INTRODUCTION

The Draft Environmental Impact Statement (DEIS) for proposed I-494 was circulated in July 1977. Mn DOT held an informal open house and a location-design public hearing on the project in Mendota Heights on August 25, 1977. These gave the general public, local municipalities, and appropriate agencies and organizations an opportunity to review and comment on the DEIS. A 51-day comment-period (from August 25 to October 15) allowed additional time for submitting written statements.

Following in this section is a summary and disposition of substantive socio-economic, environmental, and other comments received at the public hearing and during the comment-period. Letter-designations key substantive comments to our response. The categories and page numbers of the comments appear on the following page.

SECT XI COMMENTS AND RESPONSES (CONT)

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PART A COMMENTS RESULTING FROM THE 25 AUGUST 1977 PUBLIC HEARING

1. RECEIVED AT HEARING

The following is a summary of the substantive comments received at the Public Hearing. Comments are in italics. The response to the comment follows immediately in regular type.

A. *That homeowners whose land and property are taken be fairly and adequately compensated by the Department of Transportation.*

Mn DOT will pay fair-market value to all homeowners (and owners of businesses) whose land and property proposed I-494 takes as required by the Federal Uniform Relocation Act of 1970. When eligible, persons displaced will receive replacement-housing differential, moving costs, closing costs, interest differential, and appraisers fees.

B. *That the Draft Environmental Impact Statement was defective in that it did not consider the overall cumulative effects of the proposed action and therefore the public hearing was not a valid public hearing.*

As the DEIS pointed out, the proposed section of I-494 is part of the Functional Classification Plan (FCP), the transportation system planned for the seven-county St Paul-Minneapolis Metropolitan Region. The need for I-494's construction and the effects resulting from its construction are considered at both the system and local levels. The forecasted traffic volumes, the air analysis, and the population, employment, and dwelling unit projections presented in the DEIS were based on the assumption that all the highways in the FCP will be completed; thus, these were considered at the system level. At the local level, the EIS discussed both the direct and secondary impacts, including the proposals impact on existing and proposed development, traffic volumes, and community services.

Some of the other highways proposed for construction in the FCP also require an EIS. These statements have been prepared, or will be, for each project individually.

Federal Regulations (FHPM 7-7-5) require State Highway agencies to hold, or provide an opportunity for, a corridor and design public hearing on a Federal-Aid highway project when the following occur —
— Its on a new location.
— It has substantial social, economical, or environmental effect.
— It essentially changes the layout or function of connecting roads or streets.

The public hearing for I-494 provided an opportunity for Mn DOT to present information on the project to the public (and to give the public opportunity to comment). Mn DOT accomplished this through an informational meeting that preceded the hearing and through a slide presentation given during the hearing. The sub-reports and graphics that served as basis for the DEIS were on display at the informational meeting and throughout the hearing. Mn DOT personnel were on-hand to answer questions.

The slide presentation, which included a narration, summarized information from the DEIS and the sub-reports. (These reports presented a detailed analysis of the proposals affect on social, natural, and economic resources — including the proposed highway's function in, and importance to, the regional and local transportation system and comprehensive plans. They were summarized in the DEIS.)

C. *That the interchange of I-494 with Pilot Knob Road should not be included in this project but rather an interchange should be provided at Trunk Highway 13.*

Subsequent to the public hearing, Mn DOT (at the request of the City of Eagan) made a study of the feasibility of construction an interchange at TH 13 and I-494 rather than one at Pilot Knob Road. As part of the study, Mn DOT drew a design of an interchange at TH 13 and considered such points as the following —

— Social, economical, and environmental impacts.
— How well an interchange at TH 13 would function in the overall transportation plan.
— Cost (about $2,150,000 for the property acquisition and construction at TH 13 as compared to $100,000 for completing the construction at Pilot Knob Road).
These points were discussed in several public meetings with Eagan and Dakota County officials and area residents. In a meeting on March 8, 1978, Mn DOT presented its conclusion: Locating an interchange at TH 13 rather than Pilot Knob Road would not be consistent with good highway design nor would it be compatible with existing and proposed local planning and transportation needs. Also, an interchange at TH 13 rather than Pilot Knob Road would probably result in truck traffic using several residential streets that connect to TH 13 (Lone Oak Road, Highview Av, and Mendota Heights Rd) to reach the industrial parks. An interchange at TH 13 would also require some encroachment on the bluff of the Minnesota River, which is part of the Mississippi River Corridor Critical Area, and would take land from the Lost Spur Country Club's Golf Course and remove two residences. An interchange here might also encourage development in the critical areas.[1]

D. *That Alternate A be given further consideration.*

See the Discussion on Alternate A in E of the Responses to Dayton, Herman, and Graham (p 156).

E. *That something be done with the roadway system on the east end of the Mendota Bridge.*

Mn DOT has developed a preliminary design for the intersection of TH's 13, 10 and 55 in the area immediately east of the Mendota Bridge. Environmental studies are underway, and plans are to start the reconstruction in 1980. (See Discussion on p 19 .)

F. *Opposition to having I-35E rerouted along I-494 to the Lafayette Freeway (TH 3) if I-35E in St Paul is not built. Therefore, I-35E issue must be resolved.*

See A of Responses to Inver Grove Heights (p 199).

G. *Construct mass transit facilities parallel to the highway development with park and ride provisions.*

The Metropolitan Council (MC) and the Metropolitan Transit Commission (MTC), agencies responsible for transit decisions, consider buses operating in mixed traffic with preferential treatment at points of access and egress where necessary adequate for I-494. Mn DOT has been working with the MTC to develop policies and procedures for the construction and maintenance of park and ride sites (see A in Responses to MTC, p 187).

H. *Opposition to Not providing an interchange at I-494 and Pilot Knob Road.*

See C.

I. *Opposition was expressed to the I-494/Robert Street interchange.*

TH 52 (South Robert Street) is a very important North-South Minor Arterial Highway. The proposed half-diamond interchange at TH 52 will allow freeway access to and from the west on I-494. The complimentary access to and from the east is provided at the TH 110-TH 52 interchange.

The half-diamond interchange ramps at TH 52 and I-494 are each expected to carry about 5,000 vehicles per day. If the half-diamond were eliminated these vehicles would have to divert to very circuitous routes (via local streets and county roads) to reach other land access interchanges at TH 49 or perhaps one just west of Delaware Av, if it is constructed. This would place a heavy burden upon the local road system and on the other interchanges which will already be very busy. The traffic added to the local road system would add to the environmental impacts that they already have.

[1] On 20 June 1978, Eagan's city council passed a resolution approving the location of the interchange at Pilot Knob Road.

J. I-494 should be built in the TH 110 and TH 55 corridors.

See Discussion on the TH 110 and TH 55 corridors in E of Responses to Dayton, Herman, and Graham, p 155.

K. I-494 should have a maximum of 3 interchanges.

The number and location of interchanges along I-494 will depend on the expected desire of motorists to make certain movements between proposed I-494 and existing and proposed highways in the project area. What movements the motorists will desire depends largely on existing and expected traffic patterns and existing and proposed development.

L. Pedestrian and bike trail system on the 494 bridge.

Mn DOT and the Department of Natural Resources (DNR) are currently discussing the possibility of a pedestrian and bike trail on the I-494 bridge. If included as part of the design, the trail will be separate from the roadway. (Since proposed I-494 will use federal funds, the design and construction of the trail would be subject to FHWA approval.)

M. Provide access at TH 13, TH 55 and Lexington Av.

Access at these points would not be consistent with the overall design.

Interchange spacing requirements along I-494 will not allow interchanges to be built at both TH 13 and CSAH 31 (Pilot Knob Road). (See Response to Comment C for additional discussion on locating an interchange at TH 13 or Pilot Knob Road.)

Interchanging I-494 with TH 55 and Lexington Av is physically impossible due to the proximity of the two roads to one another and to proposed I-35E which interchanges with I-494 right in this same area.

N. Concerned that Schmidt Lake will serve as a sounding board and amplify road noise across the lake.

Although noise carries over bodies of water, it isn't actually amplified. Residences on the south shore of Schmidt Lake will not be subjected to traffic noise from I-494 above the L 65 dBA State standards.

2. RECEIVED SUBSEQUENT TO HEARING

A total of 206 letters[2] commenting on the proposed highway construction were received from private citizens, businesses and organizations after the public hearing of 25 August 1977. The number in each category were as follows —
— 137 from private citizens
— 55 from businesses
— 14 from organizations

Of the 206 letters received, only three opposed the construction (one of these, because it's primarily commenting on the DEIS, appears in this section on p 160). The remaining 203 letters all support the construction of the proposed section of highway.

Following in this section is a summary of the 137 letters received from private citizens and the 55 received from businesses. Also included are copies of the 14 letters received from the organizations. The letters from private citizens and businesses were summarized rather than printed because of the large number received. The letters from the organizations were printed because there were only a few (although they represent a considerable number of individuals or businesses).

A. SUMMARY OF LETTERS FROM CITIZENS AND BUSINESSES

A summary of the comments of the 137 letters from private citizens is as follows: 74 favored Alt B2; 59 favored the construction but did not indicate a preference of alternates; one favored a corridor further south (utilizing existing TH 55); one was opposed to proposed I-494 encroaching on Schmidt Lake; one requested early acquisition of his home; and one, displeased with the EIS, requested time for further study (appears on p 160).

Basically, these letters (137) had similar complaints about the problems on, or caused by, the existing road system. The complaints and the number of letters containing them are as follows: congested roadways (108); wasted travel time (52), wasted fuel (51), problems in commuting (39); unsafe travel conditions (34), additional costs (17); pollution (13); and frustration (67).

All 55 responses from businesses supported the completion of I-494. Thirty-seven of those responding expressed a preference for constructing Alt B-2. The remaining 18 did not indicate a preference.

The 55 respondents complained of the following problems with the existing roadway system: congestion (42); safety (23); wasted travel time (21); restricts or delays property development (19), wastes fuel (17), slows or causes problems in commuting to service areas (27), causes income losses (9); creates pollution (7), and increases travel costs (5).

[2] These letters are included in the totals in Table A-2, Alternate Preferences, p 211.

B. LETTERS FROM ORGANIZATIONS

Urban Council on Mobility
33 East Wentworth Avenue, West St. Paul, Minn. 55118 * 457-1757

October 14, 1977

District 9 - MN/DOT, Division of Highways
3485 Hadley Avenue North
P.O. Box 2050
North St. Paul, Minnesota 55109

Re: Minnesota Project I-494
State Projects 1985, 1986, 2785

Dear Sirs:

The Urban Council on Mobility favors the earliest possible completion of Interstate 494, the above referenced project, along the Preferred Corridor Alternate B-2.

The need for completion of our interstate system in this area has been apparent for over 20 years, but instead of results in the solution to our transportation problems, we have experienced 20 years of red tape, bureaucratic bungling, indecision, excuses, procrastination, and delays in relation to freeway construction in Dakota County.

The Urban Council on Mobility is a citizen based organization of over 2500 members and has conducted extensive research on transportation facilities and planning in this area. We have concluded and proven that there are substantial environmental, economic, and social benefits that accrue to all through the completion of adequate transportation corridors.

Bridge bottlenecks on I-35W, the Cedar Avenue Bridge, the Mendota Bridge, and heavily congested Highways 13, 110, 55, 49, 3, 56 and Cedar Avenue were, and are, eroding our quality of life by causing high accident rates, wasted gas, excessive pollution, and wasted time. Our neighborhood streets are being inundated with traffic which should be using the freeways, and would be, if the freeways were constructed.

The solution to these problems rests in completing Cedar Avenue, I-35E, and I-494, and the Urban Council on Mobility is dedicated to that cause.

Our trunk highways, county, and local roads were not designed to carry the traffic that is being forced upon them today due to the incompletion of our interstate system. It is unsafe, and in many cases impossible, for people to get out of their driveways for long periods. We have had people killed while trying to get mail from their mailboxes.

The St. Paul Dispatch of August 19, 1975 headlined "Dakota Traffic Accidents Up 84%, County Called 'Hazardous Area'." The Dakota County Traffic Engineer said, "When that happens it's a sure sign that a road system's saturation point has been reached.

A Minneapolis Star, February 11, 1975, article headlined, "Dakota Road Damage High, Patrol Light" and showing a picture of the I-494 and T.H. 56 (Concord Street) interchange quoted the Highway Development's Senior Research Analyst for the Highway Patrol as saying that Northern Dakota County has more accidents than any other Highway Patrol station in the state.

Accident rates in our area are as high as 15.22 accidents per million vehicle miles, while the average freeway accident rate is only 1.02.

WE DO NOT LIKE THESE ODDS!!

The Minnesota Institute of Traffic Safety has computed the economic loss of auto accidents in Dakota County for the year 1975 (the latest year for which figures are available) at $22,131,080. We know the years 1976 and 1977 will show increased losses as will subsequent years until we have adequate roads. Far too many families have suffered the loss of loved ones, severe injuries, and property damage.

It is CRIMINAL to continue this carnage when we have it within our power to provide safer, more efficient transportation corridors such as Cedar Avenue, I-35E, and I-494. Twenty years of studying these highways is extremely excessive. It is time to get about the job of constructing.

There are a small few who continue to make demands for more studies. These small few are using the well intentioned planning process as a mischievous tool for their selfish interests to stop these necessary roads or to push them into someone else's area. Eleven people have been killed in our area since December of 1976. Many others have been seriously injured. Those persons responsible for delay in the construction of our safer roads should be held accountable to the victims and their families.

Each of our roads is designed to handle a certain corridor contribution. The road system breaks down and will not function efficiently if any corridor is forced to take the traffic assigned to another. An example of that is I-35W. It was not designed to handle the Cedar Avenue or the I-35E corridors and it will not function properly until those corridors are built. Fortunately, through the efforts of the Urban Council on Mobility, Cedar Avenue is under construction and is expected to be completed by 1980. The Final EIS on I-35E in Dakota County was just approved on August 11th this year, and construction contracts are to be let this Fall. Completion of I-35E in Dakota County is expected between 1981 and 1983.

The Draft Environmental Impact Statement on Interstate 494 discusses four alternate plans. The Urban Council on Mobility supports Alternate B-2 in the Preferred Corridor. It is, in essence, the first phase of Alternate B-1. What it does is this; it provides interchange with I-35E and I-494 but does not relocate T.H. 55 or interchange with it. It does allow for the relocation and interchange with T.H. 55, if and when the demands on T.H. 55 would warrant it. We emphasize "if and when". If the need to upgrade and relocate T.H. 55 never presents itself, the system can remain as B-2, but if it is evident in the future T.H. 55 and the B-2 interchange need expanding to handle the demands, we will then have the land and the capability to do it without disrupting and relocating additional people and businesses. Land values will be going nowhere but up, so that future land costs will add millions of tax dollars to the expanded project.

A classic example of short-sightedness is the T.H. 100 Western Beltline through Edina. No provision had been made for what should have been an obvious need for future expansion. The expansion costs were exorbitant, and the disruption and relocation of businesses and families that built along the original T.H. 100 was not only expensive, but traumatic. We should learn from that experience, and prevent that from happening here. The small additional right-of-way we would acquire under Alternate B-2 is the best insurance policy we could get if Alternate B-1 is needed in the future. If it is not needed, that additional land can serve as an open space buffer.

Any delay in the construction of our needed roads had a tremendous impact on the costs. Historically, construction costs have been increasing at a rate of 14% per year; and due to increased petroleum costs, we had a 35% increase in one year. We can only build one-half the roads today for the same dollars we could have built the whole roads two years ago. It is costing between $1½ million to $3 million per month to delay these freeways. Add to this, added fuel costs and travel loss due to congestion, and the total costs skyrocket.

There has been an effort on the part of some people in St. Paul to have a section of I-35E, which has been planned along the Pleasant Avenue Corridor, routed through Dakota County instead. This group has proposed that I-35E traffic be routed along either I-494 or T.H. 110 to the Lafayette Freeway and into St. Paul. Here again, we have an attempt to force an additional traffic corridor contribution onto a corridor not designed or built to handle it. We in Dakota County have accepted the I-35E and Lafayette Freeways, and now I-494, and we feel very strongly that St. Paul should accept theirs.

In 1970 the population of Dakota County was 139,808. Our 1976 estimated population was 184,113, an increase of over 44,000. The Metro Council's latest population estimates show explosive growth in Dakota County:

1980 - 199,800
1990 - 273,250
2000 - 328,900

Although the design period for our highways is for only 20 years, we are really establishing our corridors for 100 years or more. We know of no place in Minnesota where we have ever overbuilt a highway. It has always been the reverse. As you can see from these projections, at the end of the 20 year design period of I-494, we are expected to have a Dakota County population of 328,900 which is 189,092 more than our 1976 population of 139,808.

In summation then, the Urban Council on Mobility supports Alternate B-2 along the Preferred Corridor, because it provides for our needs now and keeps the options open for upgrading if the future demands warrant it.

Sincerely,

John J. Klein
Project Director

CITY OF APPLE VALLEY
RESOLUTION NO. 1977-207

COMMENTS ON DRAFT EIS STATEMENT FOR I-494.

WHEREAS, the City Council of the City of Apple Valley has reviewed the draft EIS Statement for I-494, and

WHEREAS, road improvements in Northern Dakota County have for a number of years been planned in accordance with a very desirable timetable, but construction has often been delayed considerably beyond original projections, and

WHEREAS, Commercial and residential development in Northern Dakota County has been proceeding based on plans for installation of new roads, including the I-494 freeway, and

WHEREAS, the delays in the construction of the I-494 freeway have resulted not only in significantly increased construction costs of the road itself, but also the economic impact on Northern Dakota County business and residential property owners has been significant.

NOW, THEREFORE, BE IT RESOLVED by the City Council of the City of Apple Valley that the City Council hereby unanimously supports construction of I-494 between the Minnesota River and the Mississippi River.

BE IT FURTHER RESOLVED that the City Council support alternate B-2 which is in essence a long term staging of alternate B-1 where I-494 would be constructed without relocated Trunk Highway 55, but would include design and right of way provisions to do so in the future.

BE IT FURTHER RESOLVED that the City Council supports construction of an interchange at the intersection of I-494 and County Road #31 as being in the best interest of the City of Apple Valley.

BE IT FURTHER RESOLVED that copies of this Resolution be forwarded to the Minnesota Department of Highways as Apple Valley's official comments on the I-494 Draft IES, to the Dakota County Board of Commissioners, to the City of Eagan, and to the Urban Council on Mobility.

ADOPTED this 13th day of October, 1977.

s/
W. E. Branning, Mayor

ATTEST:

s/
Mary E. Mueller, Deputy City Clerk

CLERK'S CERTIFICATE

I, MARY E. MUELLER, Deputy City Clerk of the City of Apple Valley, hereby certify that the above Resolution is a true and correct copy of a Resolution adopted by the City Council on October 13, 1977.

Mary E. Mueller
Mary E. Mueller, Deputy City Clerk

northern dakota county
CHAMBER OF COMMERCE
SUITE 101 • 33 E. WENTWORTH AVE. • PHONE: 457-4921 • WEST ST. PAUL, MINNESOTA 55118

August 26, 1977

Charles E. Burrill, P.E.
District Engineer
Minnesota Department of Transportation
3485 Hadley Ave. North
Box 2050
North St. Paul, MN 55109

Dear Mr. Burrill

Enclosed is the Resolution of the Northern Dakota County Chamber of Commerce as read at the Public Hearing, held August 25, 1977 at Henry Sibley High School.

Sincerely

NORTHERN DAKOTA COUNTY
CHAMBER OF COMMERCE

Robert L. Hanson
Executive Secretary

Enc.: Resolution on I-494

SERVING: EAGAN • MENDOTA • MENDOTA HEIGHTS • WEST ST. PAUL

northern dakota county
CHAMBER OF COMMERCE
SUITE 101 • 33 E. WENTWORTH AVE. • PHONE: 457-4921 • WEST ST. PAUL, MINNESOTA 55118

August 25, 1977

RESOLUTION

WHEREAS, the Board of Directors of the Northern Dakota County Chamber of Commerce representing businesses in Eagan, Mendota, Mendota Heights and West St. Paul has reviewed the draft Environmental Impact Statement for Interstate 494, and

WHEREAS, The Northern Dakota County Chamber of Commerce has supported the completion of adequate transportation corridors in Northern Dakota County, and

WHEREAS, The Northern Dakota County Chamber of Commerce strongly supports those that do not want I-35E rerouted onto 494 and 3 thus becoming I-35E corridor through St. Paul, which means the legislative enacted moritorium on I-35E in St. Paul must be lifted, and

NOW THEREFORE BE IT RESOLVED that the Northern Dakota County Chamber of Commerce support the completion of I-494 from 24th Avenue in Bloomington to the Mississippi River in South St. Paul as soon as possible through cooperative effort of the communities involved, and so we do not foreclose on future options we support the concept of Alternate B2 at this time.

NORTHERN DAKOTA COUNTY
CHAMBER OF COMMERCE

R. F. (Pete) Noerboon
President

SERVING: EAGAN • MENDOTA • MENDOTA HEIGHTS • WEST ST. PAUL

Central Livestock

HOME OFFICE SOUTH ST. PAUL, MINN. 55075
PHONE 612-451-1844 – 612-451-1828

CLA CENTRAL LIVESTOCK ASSN INC COB CENTRAL LIVESTOCK ORDER BUYING CCS CENTRAL COMMODITY SERVICES

September 26, 1977

Dist. 9 - MN/DOT
Division of Highways
3485 Hadley Avenue North
P.O. Box 2050
North St. Paul, Mn. 55109

Re: Minn. Project I-494
State Projects 1985, 1986, 2785

Gentlemen:

The Central Livestock Association is a livestock marketing cooperative with headquarters in South St. Paul. We have approximately 125,000 livestock producer-members residing in a seven-state area, approximately 80% of which are in the State of Minnesota. Our members are served by livestock truckers and shipping associations scattered throughout this area.

It is extremely important to our members and patrons that I-494 be completed as planned. The present roads are not adequate to service in and out of this area and because of congestion cause inefficient use of truck transportation, truckers' time, and greater than necessary shrinkage of livestock in transit.

As President of Central Livestock Association, we would hope that all efforts would be made to successfully complete the I-494 system and, therefore, improve the highway accessibility of the important South St. Paul market for our livestock-producer members.

Sincerely yours,

K. R. Lehman,
President & General Manager

KRL:hv

DIRECTORS
NORMAN CHRISTIANSON CHAIRMAN — ROBERTS WIS. — R. C. CROCKETT TREASURER — LANGDON N. D. — JAY O. SCHULTZ — BISMARCK N. D.
HARRY MOLENAAR 1ST VICE CHAIRMAN — ARTHUR MINN. — CHARLES GILSTAD — FOSTON, MINN. — KENNETH WALDEN — CARLYLE MINN.
RALPH SOUDER 2ND VICE CHAIRMAN — RUDD IOWA — CLYDE HAHN — BILLINGS MONT. — CHESTER GULKSON — BATH N. D.
DONOVAN RUESINK SECRETARY — SPRING VALLEY MINN. — CALERNE OLSON — PARKERS PRAIRIE MINN.
MANAGEMENT
FRANCIS ANDERSEN VICE PRESIDENT COB — KIEFFER R. LEHMAN PRESIDENT & GENERAL MANAGER — SOUTH ST. PAUL MINN. — KEITH A. AHO VICE PRESIDENT CCS
DON KAUFMEIER VICE PRESIDENT CLA — R. W. (BUD) KURTENBACH ASST. SEC. TREASURER

SOUTH ST. PAUL

Livestock Market Institute

THIRD FLOOR EXCHANGE BUILDING • SOUTH ST. PAUL, MINNESOTA 55075 • (612) 459-2991

September 29, 1977

District 9 - MN/DOT, Division of Highways
3485 Hadley Avenue North
P.O. Box 2050
North St. Paul, MN 55109

RE: Minnesota Project I-494
State Projects 1985, 1986, 2785

Gentlemen:

The South St. Paul Stockyards is the largest Stockyard in the world based both on land size (over 100 acres) and volume of livestock marketed annually (over 3 million head).

In terms of transportation, this means that over 275,000 trucks per year deliver livestock to the South St. Paul market from our five state market area. Additionally, over 150 large potbelly trucks haul livestock from the South St. Paul market to packing plants throughout the United States as well as a few foreign countries.

In terms of dollars, the South St. Paul market represents a substantial impact on economic conditions in the State of Minnesota. Over $550 million per year are paid out to livestock producing customers who sell through our market each year.

We strongly support the earliest possible completion of Interstate Highway 494 and Alternate B-2 because transportation is the most vital element effecting our future as the World's Largest Stockyards.

We conservatively estimate that we could increase our business from 10-20% annually with the completion of I-494 and I-35E in Dakota County. A great share of this increase in business would come from out of the State of Minnesota and primarily the northern tier counties of Iowa. I don't feel it is necessary to go into great detail about what effects this increase in business would do to the economic stability of the agricultural industry in Minnesota.

South St. Paul has been a transportation dependent industry for most of its history and shows indication of substantial growth. The volume of truck transportation that is generated from companies like the stockyards, Armours, F.O.K., Sun Star Foods, Cenex, Armstrong Truck Lines, Lenertz Truck Lines, South St. Paul Feed, Inc., and many other large distribution companies, results in more truck traffic than any other single location in Minnesota and must have modern, efficient freeways to move goods.

Again, and I can not emphasize this enough, the earliest possible completion of I-494 and Alternate B-2 is strongly supported by the South St. Paul industrial community.

Sincerely,

Steven G. Loeding
Executive Director

SGL/jms

AL TAUTEN — LARRY TAUTEN — FRANCIS "Bud" BAUER — DENNIS MORTENSON
TOM ECKER — KENNY LAWRENCE — ANDY KAHLHAMER

THE HAAS LIVESTOCK SELLING AGENCY, Inc.

SERVING LIVESTOCK SHIPPERS SINCE 1882
EXCHANGE BUILDING SOUTH ST. PAUL, MINN. 55075 TELEPHONE 451-6801

October 11, 1977

District 9 MN/Dot, Division of Highways
3485 Hadley Avenue North
P.O. Box 2050
North St. Paul, Minnesota 55109

Re: Minnesota Project I-494
State Projects 1985,1986,2785

Gentlemen:

Since we are the largest independent selling agency on the So. St. Paul market we have an opportunity to talk to many of the truckers and producers from the southeastern part of the state. There isn't a day that we don't have at least one complaint about some of the congestion they encounter in coming to So. St. Paul with their livestock. For that reason we strongly support the completion of I-494, Alternate B-2.

Sincerely,

The Haas Livestock Selling Agency, Inc.

By:

Phone 224-9445

Saint Paul Building and Construction Trades Council

411 Main
LABOR TEMPLE, ~~AUDITORIUM~~ STREET
SAINT PAUL, MINNESOTA 55102

September 27, 1977

AFFILIATED UNIONS
•
ASBESTOS WORKERS No. 34
BOILER MAKERS No. 647
BRICKLAYERS No. 1
BRICKLAYERS, MASONS & PLASTERERS No. 9
CABINET MAKERS & MILLMEN No. 1252
CARPENTERS No. 87
CARPENTERS No. 957
CEMENT MASONS No. 560
ELECTRICAL WORKERS No. 110
ELEVATOR CONSTRUCTORS No. 9
GENERAL DRIVERS No. 120
GLAZIERS No. 1324
HOD CARRIERS & LABORERS No. 132
IRON WORKERS No. 512
LATHERS No. 483
LINOLEUM WORKERS No. 596
MARBLE & STONE SHOPMEN No. 91
MILLWRIGHTS No. 548
OPERATING ENGINEERS No. 49
PAINTERS No. 61
PILE DRIVERS No. 1847
PIPEFITTERS No. 455
PLASTERERS No. 20
PLUMBERS No. 34
ROOFERS No. 96
SHEET METAL WORKERS No. 76
SIGN PAINTERS No. 880
SPRINKLER FITTERS No. 417
TERRAZZO WORKERS No. 5
TERRAZZO WORKERS HELPERS No. 107
TILE LAYERS No. 18
TILE LAYER HELPERS No. 34

District 9 - MN/DOT, Division of Highways
3485 Hadley Avenue North
P.O. Box 2050
North Saint Paul, Minnesota 55109

Re: Minnesota Project I-494
State Projects 1985, 1986, 2785

The Saint Paul Building and Construction Trades Council and its 31 affiliated Local Union, representing 12,000 Building Tradesmen living and working in the metropolitan area, support the completion of I-494, Alternate B-2.

The Saint Paul Building and Construction Trades Council has work jurisdiction in the counties of Ramsey, Dakota, Washington, Chisago, and Pine.

With a substantial amount of construction work being done in Dakota County, our members living in other Counties need the freeways to travel to and from their jobs.

Sincerely,

RICHARD C. RADMAN, Secretary

Associated General Contractors of Minnesota
CONTRACTORS BUILDING TOMORROW TODAY
45 East Eighth Street, St. Paul, Minnesota 55101 • Tel. (612) 291-1102

WILLIAM H. GARY
Manager

President
JOHN A. WOODHALL JR
Wallmar

Secretary-Treasurer
CHRIS J. WOODS
Minneapolis

Building Division
Vice President
NICHOLAS G. SIMONS
Minneapolis
Director
HERBERT C. KEPPEN
Duluth
Director
C. E. SHEEHY, JR.
St. Paul

Highway Division
Vice President
WILLIAM H. BLATTNER, JR.
Avon
Director
CHARLES E. BROWN
North Mankato

Heavy Division
Vice President
JOHN C. ELLISON
Minneapolis
Director
RICHARD M. FERRON
Hopkins

Subcontractor Division
JAMES H. OLSON
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National Directors
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CHARLES P. McGOUGH
D. K. SORY
RAY A. JOHNSON
PRESTON C. HAGLIN
JOHN A. WOODHALL JR
WARREN B. WOODRICH

October 4, 1977

District 9 - MN/DOT, Division of Highways
3485 Hadley Avenue North
P. O. Box 2050
North St. Paul, Minnesota 55109

Gentlemen:

I could have written this letter on a different letterhead, because it might be expected that in my official capacity as Manager of AGC of Minnesota, I favor construction of I-494, Alternate B-2.

However, as a resident of the St. Paul area, and driving almost daily on state highways, I am a very strong proponent, personally, of completion of I-494 and all our interstate routes.

My opinion is that I waste more than two hours weekly moving from St. Paul toward Rochester, Burnsville, Faribault, Albert Lea, Austin and other areas south and west of St. Paul.

We were promised these completed freeways by our elected officials several years ago, and have sat in long lines of traffic on Mendota Bridge, Cedar Avenue, 135W and other places wasting fuel and time because of these highway routes not being completed.

There is no secret that completion of this route at this time will cost more than 50% more than if they had been built on time... and that every month we wait, the cost will continue to rise.

The downtown St. Paul area (where my office is located) suffers a lack of business because the routes across the river and to other interstates are over crowded. We should all be concerned with assisting our capitol city grow and prosper by making it easier to shop and work there.

Sincerely,
William H. Gary

WHG:mw

MINNESOTA MOTOR TRANSPORT ASSOCIATION — TRUCKS SERVE EVERYONE IN EVERY COMMUNITY —

September 27, 1977

District 9 - MN/DOT, Division of Highways
3485 Hadley Avenue North
P.O. Box 2050
North St. Paul, Minnesota 55109

Re: Minnesota Project I-494
State Projects 1985, 1986, 2785

Gentlemen:

On behalf of the Minnesota Motor Transport Association, a trade association of over 250 members including motor carriers of freight and passengers, and suppliers to these motor carriers, we wish to express our support for completion of the Interstate System in Minnesota, especially those segments in the Twin City/metropolitan area which can greatly facilitate vehicle movement in densely populated areas.

One of these is I-494, Alternate B-2. Traffic congestion adversely affects the quality of our air, and causes the inefficient consumption of fuels available in Minnesota. Even more important, however, is the issue of highway safety. All available evidence clearly indicates that the Interstate System has made a significant contribution to reduced highway deaths and injuries. Each day's delay in the completion of our Interstate network exacts a price that we simply cannot -- and should not -- be willing to pay.

In conclusion, I can say without exception, that on the basis of safety, energy conservation, environmental concerns plus the transportation costs that invariably result from older, less efficient highways, the members of the Minnesota Motor Transport Association are united in their plea that the various projects leading to the completion of I-494 be carried out in as timely a fashion as possible.

Sincerely,

James N. Denn
Executive Vice President

kab

321 UNIVERSITY AVENUE · GRIGGS-MIDWAY BLDG · ST. PAUL, MINN. 55104 · AREA CODE 612 646-7351

CMS

CHARLES M. SLOCUM, C. L. U.
7900 Xerxes Avenue S.
Minneapolis, Minnesota 55431
(612) 831-0505

August 30, 1977

State Highway Department
State Highway Building
St. Paul, MN 55101

Gentlemen:

The Dakota Development Association is made up of approximately two-hundred (200) business firms located in Dakota County. We strongly urge immediate action on the completion of I-494. This is one of the last links in the interstate system as pertains to Minnesota and it has already been delayed for too long. Dakota County Development would support Alternate B-2, including design and right-of-way provisions for the ultimate relocation of trunk highway 55. This seems to make the most sense from the stand-point of the costs and the benefit ratios.

Yours very truly,

Charles M. Slocum
President
Dakota County Development
Association

Consultants for Executive Compensation,
Tax Planning, Pensions, Profit-Sharing and Group Plans

SAINT THOMAS ACADEMY | 949 MENDOTA HEIGHTS ROAD • SAINT PAUL • MINNESOTA • 55120 • TEL (612) 454-4570 •

September 26, 1977

District 9 - MN/DOT, Division of Highways
3485 Hadley Avenue North
P.O. BOX 2050
North St. Paul, Minnesota

Gentlemen:

I would like to let you know my position on Minnesota Project I-494. It would seem that we have been fooling around, delaying long enough--too long--on this needed project. I want to state that I favor

the completion of I-494, Alternative B-2.

There seem to be ample reasons for completion of this project. The obvious and painful congestion on the Mendota, Cedar Avenue and Lexington Bridges in this area is not in the realm of projection. Time wasted, gas consumed and tempers flaring is simply an everyday reality, not to mention the growing accident rate.

Our school was located out here in Mendota Heights for several reasons, one of which was the proposed system of new highways. Most of those highways lie still in the vacant roadways on which they were planned.

Please hear the citizens who NEED the roads, rather than the few loud do-gooders who live in their ivory towers.

sincerely,
John Pilaczynski, O.M.I., Ph.D.
the Rev. John Pilaczynski, OMI

EX UMBRIS IN VERITATEM

83 West California
Saint Paul, Minnesota 55117

September 27, 1977

District 9 - MN/DOT, Division of Highways
3485 Hadley Avenue North
P.O. Box 2050
North Saint Paul, Minnesota 55109

Re: Minnesota Project I-494
State Projects 1985, 1986, 2785

Gentlemen:

The Metropolitan Sports Facilities Commission has selected Eagan and Bloomington as possible sites for a new Sports Stadium.

The completion of I-494 is crucial to this project.

I support the earliest possible completion of I-494, Alternate B-2, so that its completion may coincide with the opening of the new Sports Facility at either the Eagan or Bloomington site.

Sincerely,

Richard C. Radman

RICHARD C. RADMAN
Member of the Metropolitan Sports Commission

Southeast Metropolitan Area
Chamber of Commerce
230 North Concord Street
South St. Paul, Minnesota 55075
(612) 451-2266

September 29, 1977

District 9 - MN/DOT
Division of Highways
3485 Hadley Avenue North
P. O. Box 2050
North St. Paul, Minnesota 55109

RE: Minnesota Project I-494
State Projects 1985, 1986, 2785

Gentlemen:

The Board of Directors of the Southeast Metropolitan Area Chamber of Commerce strongly supports the early completion of I-494, Alternate B-2. It is felt that completion of I-494 will be beneficial to all of South St. Paul . . . the residents and the business community.

Many people are being adversely affected by traffic congestion on our overly crowded highways, i.e. Trunk Highway 13, 49, 52, 55, 56 and 110. This causes loss of time, wasted gas, unnecessary pollution and high accident rates. Our local streets and county roads are being inundated with traffic which the freeways would be carrying if they were built, thereby eroding the quality of life in our neighborhoods.

We have all endured inadequate roads much too long and it is urged by our Board of Directors that an early completion date for I-494 be set.

Sincerely,

John C. Fleming
President

JCF/sn

BOARD OF COUNTY COMMISSIONERS
DAKOTA COUNTY, MINNESOTA

Date August 16, 1977 Resolution No. 5

Motion by Commissioner Kennedy *-- Seconded by Commissioner* Streefland

BE IT RESOLVED, that the Dakota County Board of Commissioners support the completion of the construction of Interstate 494 in Dakota County,

AND BE IT FURTHER RESOLVED, that the Dakota County Board of Commissioners not support any particular alignment of Interstate 494 in Dakota County because it had no opportunity to examine the documents available on the established corridor.

	YES	NO
Scully	X	
Stassen	X	
Kennedy	X	
Hollenkamp		X
Streefland	X	

State of Minnesota } ss.
County of Dakota }

I, *C. D. Onischuk*, duly elected, qualified and acting County Auditor of the County of Dakota, State of Minnesota, do hereby certify that I have compared the foregoing copy of a resolution with the original minutes of the proceedings of the Board of County Commissioners, Dakota County, Minnesota, at their session held on the 16th day of August 1977, now on file in my office, and have found the same to be a true and correct copy thereof.

Witness my hand and official seal at Hastings, Minnesota, this 18th day of August, 1977

C. D. Onischuk
County Auditor

Hospitality
Industry Education Committee

Headquarters:
2001 University Ave.
St. Paul, Minn. 55104
Phone: 647-0107

October 3, 1977

District 9 - MN/DOT, Division of Highways
3485 Hadley Avenue North
P.O. Box 2050
North St. Paul, MN 55109

Re: Minnesota Project I-494
State Projects 1985, 1986, 2785

Gentlemen:

Completion of the interstate system is vital to the Twin Cities and Minnesota.

A year ago I remember a newspaper account quoting a study that I-35W, particularly that section from downtown Minneapolis south, was obsolete or at the very least overburdened.

When I-35W was completed between downtown Minneapolis to Highway 36 in Roseville, the alleviation of morning and evening traffic on I-94 between Highway 280 and downtown Minneapolis was immediate and effective.

For the record, the Minnesota Hotel, Resort, and Restaurant Associations are on record for completion of the interstate system.

Sincerely,

Chum Bohr

W.J. "Chum" Bohr
Executive Vice President

WJB:llh

Past Presidents—A. J. Fandrl, E. A. Knutson, J. C. Bernhard, Forrest Tetter, John Kalland, L. A. Sullivan, Bruce Dolby, Gordon Fenner, Norman Hoxton, Sr. Carl Jensen, Lou Midler, Russell Klein, Michael Dorr, Wallace Peters, Warren Nagel, Frank Schneider, Jr., and Dr. William Chopp

ASSOCIATION OF COMMERCIAL CLUBS, Inc.

"United action for a Better Saint Paul"

Charles A. Rauschnot SAINT PAUL, MINNESOTA

William P. Konopatzki	~~Jack Shade~~	Catherine Piccolo	Vern W. Martin	Michael Dorr, *Secretary*
President	*1st Vice President*	*2nd Vice President*	*Treasurer*	880 Rice St. (55117) 489-2640

Sept. 27, 1977

MN/DOT Division of Highways
3485 Hadley Avenue North
P. O. Box 2050
North St. Paul, Minn. 55109

Dear Sir:

I am writing this letter to let you know that the Association of Commercial Clubs voted in favor of the completion of I 94 Freeway and Bridge along alternate B-2, and 35E in Dakota County, Ramsey County in St. Paul and also I 94 in St. Paul. We are also in favor of keeping I 94 straight into Hudson Wisc.

Traffic congestion on our existing bridges such as the Wendota, Cedar Avenue, I-35W, Lexington, Lafayette, etc.

Traffic congestion on our overcrowded highways such as Trunk Highways 13, 49, 52, 55, 56, 110, etc.

Loss of time, wasted gas, unnecessary pollution, mental anguish, unsafe roads, high accident rates due to inadequate roads and bridges.

Our local streets and county roads are being inundated with traffic which the freeways would be carrying if they were built, thereby eroding the quality of life in our neighborhoods.

Increased costsof operation, production, shipping and receiving. Employee productivity, safety, absenteeism, mental attitude after fighting traffic.
How all this relates to the increased cost of your product and how this added cost must be passed on to the consumer.
How your company's expansion or the location of supporting businesses is being held up pending safe, adequate roads.
What this means to our economy, unemployment, taxes, etc.

Yours for the early completion of safe, adequate transportation corridors.

Sincerely, Charles A. Rauschnot

Como Commercial Club	Grand Ave. Business Assn.	North End Improvement Club	Central St. Paul Com'l Club
North End Business Club	East 7th Area Business Assn.	Snelling Avenue Com'l Club	Selby District Com'l Club
Riverview Improvement	Capitol City Com'l Club	West Seventh Businessmen	Smith-Dodd Businessmen Assn.
Hazel Park Commercial Club	Rice District Merchants & Professional Mens Assn.		Payne Ave. Business Assn.

dayton, herman & graham attorneys at law 800 Midland Bank Building Minneapolis MN 55401
Charles K. Dayton/John H. Herman/Kathleen M. Graham/Philip W. Gells/James A. Payne (612) 339-7611

October 14, 1977

Commissioner Jim Harrington
Minnesota Department of Transportation
Transportation Building
St. Paul, Minnesota

Re: Interstate Highway 494
in Hennepin and Dakota Counties, Minnesota,
from 24th Avenue in Bloomington to the
Mississippi River Bridge in South St. Paul,
FHWA-MN-EIS-77-03-D, Minnesota Project I-494,
S.P. 1985, 1986, 2785

Dear Commissioner Harrington:

This letter sets forth the comments of the Dakota County Environmental Protective Association concerning the draft environmental impact statement (DEIS) prepared by the Minnesota Department of Transportation and the Federal Highway Administration on the above-captioned project. These comments are submitted pursuant to the National Environmental Policy Act (42 U.S.C. §§ 4321 et. seq.) and the Minnesota Environmental Policy Act (Minn. Stat. (1976) §§ 116D.01 et. seq.) and regulations of the Minnesota Environmental Quality Council (MEQC 21 et. seq.).

A

1. THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FAILS TO DEMONSTRATE ANY NEED FOR THE PROPOSED FREEWAY.

As with many road building projects, the DEIS predicates the need for completion of I-494 on anticipated industrial, commercial, and residential development in northern Dakota County. The DEIS specifically cites the proposed industrial complex in Eagan and the closeness of the proposed freeway to the Minneapolis/St. Paul International Airport, the Metropolitan Sports Complex in Bloomington, Fort Snelling, Fort Snelling State Park, and the Minnesota Zoological Garden in Apple Valley. The EIS also cites population and employment projections published by the Metropolitan Council in 1975. Despite the superficial appearance of documenting the assumed need for the freeway with empirical data, it is

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clear that the proposed completion of I-494 in Dakota County is premised upon a circular and logically deficient argument and upon data which are now widely recognized as being outdated.

A. Projected future development does not justify construction of I-494.

The DEIS repeatedly states that construction of I-494 in northern Dakota County is required to serve anticipated commercial and industrial development along and adjacent to the planned right-of-way. (DEIS, pp. 5, 44, 66.) As evidence of this supposedly causal relationship, the DEIS notes that the comprehensive plans of Eagan, Mendota Heights, Inver Grove Heights, and to some extent Sunfish Lake, all presuppose construction of the freeway increased commercial and industrial development (DEIS, p. 44; fig. 4-2). Yet the DEIS later states that much of the future economic growth of northern Dakota County will not occur unless this segment of I-494 is completed. On page 42, in discussing land use planning in the project area, the DEIS states:

> . . . the project area is one of the least developed. Many developers cite the inadequate transportation system as a major reason for the slow growth.

Elsewhere, the DEIS states that the city of Eagan estimates that one-third of its future development depends upon the completion of I-494 (DEIS, p. 66). The DEIS also cites projections of the Metropolitan Council and local municipalities concerning employment, population, and dwelling units are predicated on the assumption that all freeways in the Metropolitan area, including I-494, will be completed. (DEIS, p. 65). It is clear that the DEIS bases the future demand for transportation in this area upon projections concerning employment, housing, and traffic. Yet, it is equally apparent that these projections are based upon the assumption that I-494 will be completed. The "need" for the proposed freeway is thus based upon future industrial and commercial development, which will occur only if the freeway is constructed.

Oddly, the DEIS recognizes the obvious circularity of this argument by noting that "new major roadways can either be caused by or be a cause of urban sprawl." (DEIS, p. 68.) Such classic "bootstrapping" threatens the soundness of the transportation planning process. This is particularly the case where, as here, the proposed facility will be constructed over previously undeveloped land and will have a major impact upon natural resources. By failing to establish any independent empirical data demonstrating that a new freeway is required, the DEIS demonstrates again that the decision

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to build a road is dictated by the economic desires of private interests, not by sound transportation planning principles. It is clear that the only "need" for this freeway is the need of private economic interests in northern Dakota County to secure adequate transportation facilities so they can harvest the fruits of the their speculative real estate acquisitions and investments. Such a "need" does not justify the expenditure of substantial sums of public monies and the ruination of what the DEIS itself call a "unique" area. (DEIS, p. 25.)

B. The factual bases for the projections of future traffic are out of date.

B

The DEIS cites the proximity of proposed I-494 to the Metropolitan Sports Complex in Bloomington, Fort Snelling, Fort Snelling State Park, and the Minnesota Zoological Garden in Apple Valley as requiring access that can be only provided by construction of I-494 as proposed. This argument omits any discussion of the substantial chance that the new stadium facility will be constructed in downtown Minneapolis, thus alleviating a substantial traffic demand to and from east Bloomington. The construction of the new zoo in Apple Valley, now scheduled for completion in early 1978, will depend upon north/south access via I-35E and Cedar Avenue, both of which intersect with present segments of I-494 in Bloomington or with T.H. 5 in St. Paul. There is no need for additional east/west access in northern Dakota County to serve the zoo.

C

Similarly, the census data cited in the EIS to support future traffic projections are no longer valid. Recent projections of the Metropolitan Council indicate that the DEIS projections of population, employment, and traffic for northern Dakota County are too high. For example, the projected population for the city of Eagan in the year 1990 has been reduced from 52,200 (DEIS, Table 3-2) to 36,000 with the number of jobs reduced from 25,8000 to 19,000 and the number of households in 1990 reduced from 17,350 to 13,350. Similar reductions have been made for Mendota Heights, where the projected 1990 population has been reduced from 14,500 to 9,000, projected number of jobs from 6,800 to 4,500, and the number of households from 4,800 to 3,000. Similar reductions occur for Apple Valley, Inver Grove Heights, Sunfish Lake, and South St. Paul. The magnitude of these changes -- approaching almost one-third reduction in some cases -- seriously impugns the confident assertion of the DEIS that future traffic demands necessitate construction of I-494. Rather, the recent changes indicate a clear need for a reexamination of this premise and a further analysis and closer scrutiny of alternatives discussed elsewhere in these comments.

C. There is no need for a freeway designed to handle traffic at 70 mph when federal law permits a maximum 55 mph.

D

It is difficult to imagine why a freeway must be designed to handle speeds up to 70 mph when federal law permits a maximum speed of only 55 mph (23 U.S.C. § 154). The 55 mph speed limit was adopted as an energy conservation measure, and there is no reason to assume that such limits will not prevail for many years to come. Yet, the DEIS unquestioningly assumes that a 1960's style, 6-lane freeway is necessary to handle the traffic of the 1980's. More analysis is obviously needed.

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3. THE DEIS FAILS TO DISCUSS ALTERNATIVES TO THE PROPOSED ACTION.

A fundamental purpose of preparing an environmental impact statement is the thorough exploration of alternatives to the proposed action. Yet the DEIS on I-494 dismisses in a few paragraphs the so-called "historic alternative" and fails to discuss any other corridor or alignment except what it admits are merely "design" alternatives in a single corridor. Several viable alternatives have been omitted.

A. Highway 55 Alternative.

An obvious alternative which the EIS fails to discuss involves routing I-494 down the present location of T.H. 55 and crossing the Mississippi River at approximately 80th Street South. This alternative would make greater use of existing highways and corridors, as required by 23 U.S.C. § 101(b), and would involve substantially less adverse impact on the surrounding environment. Moreover, such a rerouting would coincide with already-announced plans to construct a bridge south of the present bridge at Newport. I-494 could then be continued up the present route of U.S. 61 to connect with in-place I-494 at Newport. While adding some additional mileage to the length of the so-called "belt line freeway", this alternative substantially reduces adverse environmental impact while providing the same transportation facilities as provided by the proposed action. Such an alternative should clearly have been included in the DEIS.

B. The Historic Alternative: T.H. 110.

A second alternative which is discussed in the EIS is the use of T.H. 110, the so-called historic alternative. Despite the fact that the DEIS attempts to enumerate the advantages and disadvantages of this alternative, it is clear that the rejection of this alternative is based upon the same

faulty logic as is the argument for construction of I-494 in the proposed corridor. The principal disadvantages of alternate A are (1) the creation of "several negative economic impacts in Mendota Heights", (2) conflicts with the comprehensive plans of Mendota Heights, West St. Paul and Sunfish Lake, (3) conflict and function between I-494 and present T.H. 110; and (4) in adverse effect upon the existing and proposed development in Eagan. Of the four reasons given, two cite adverse economic impacts upon Eagan and Mendota Heights. Again,the conclusion that the freeway ought to be built serves as the premise for the argument supporting its construction.

In addition, the analysis of alternative A fails to determine whether impacts would be less using alternative A. There is no attempt to inventory the impact on natural resources by using alternative A. Since a major transportation facility already exists in the corridor, the natural resource impacts would obviously be dramatically lower than any of the three other alternatives discussed in the DEIS. The DEIS does not subject alternative A to the searching inquiry required under both NEPRA and MEPA.

C. Construction of a different highway facility.

The DEIS incorrectly includes "other proposed highway improvements" in the so-called no-build alternative. (DEIS, p. 62.) Thus, the DEIS attempts to hide another deficiency: the failure to analyze the probable impacts of construction of a road facility which is not an interstate freeway. As briefly mentioned in the DEIS on page 62, such alternates might include "the addition of turning lanes, traffic signals, frontage roads, new services and improved shoulders." Other alternatives include additional lanes, straightening, and the like. Given the lowered population projections for this area (see above, p. 3), there is a substantial probability that the upgrading of existing roads may be sufficient to handle any increased traffic volume. At the very least, an analysis of these alterntaives is necessary to assess more fully the propriety of the decision to build a full-scale freeway.

D. The EIS incorrectly assesses the impacts of the no-build alternative.

The only concrete criticism of the no-build alternative contained in the DEIS is the statement that failure to complete I-494 "would be contrary to the region's planned transportation system." (DEIS, p. 103.) The other criticisms

do not withstand vigorous analysis. The DEIS states that development of the northeast and east Metropolitan suburbs will generate more traffic through the "belt line corridor". This statement has no factual support and is merely a conclusory affirmation of the popular notion that more people means more roads. Additional data is obviously required before one may so easily assume that increased development of Lake Elmo, Oakdale, and similar suburbs requires construction of a six-lane freeway and a massive interchange in northern Dakota County. Similarly, the DEIS incorrectly concludes that failure to build the road would "have a negative effect on proposed residential in both cities." This statement is based upon traffic tie ups on the Mendota Bridge, T.H. 55, and T.H. 110. The DEIS implies without so stating that present river crossings are inadequate. Such a statement ignores the construction of a new bridge at Cedar Avenue by approximately 1980. Moreover, the completion of I-35E through Dakota County should also assist the river crossing problem.

The only concrete adverse impact of the no-build alternative identified in the EIS is the adverse impact upon residential, commercial, and industrial development in Dakota County. For example, the EIS notes that "Eagan estimates that as much as one-third of its planned industrial development if the interstates are not built." (DEIS, p. 103.) The EIS also indicates that residential development in Mendota Heights and Inver Grove Heights has been inhibited by the failure to build I-494. It is evident that the only harm resulting from the failure to build I-494 is the denial of profits to the real estate speculators. The DEIS correctly notes that the no-build alternative would "mean the absence of noise and air pollution along the preferred corridor." The DEIS also indicates that approximately 150 homes would experience an increase in noise from L_{10}3dBA to L_{10}5dBA if T.H. 110 were used. However, such an increase is insignificant compared with the increases of as much as L_{10}8dBA to L_{10}20dBA projected for certain receptor sites along the proposed corridor. The DEIS identifies other advantages of the no-build alternative, such as keeping large amounts of lands on the tax rolls, preventing visual intrusion caused by construction of the new highway, and reduction in air pollution. Matched against these advantages is the single conclusion that failure to build I-494 will adversely affect development in northern Dakota County.

Under Minnesota law, such reasoning cannot support abandonment of the no-build alternative. The Minnesota Environmental Rights Act places an affirmative burden upon state agencies to avoid conduct which threatens the environment with pollution, impairment, or destruction, so long as there is a feasible and prudent alternative. More importantly, MEPA states that "Economic considerations alone shall not justify such conduct." (Minn. Stat. (1976) § 1160.04 Subd. 6.) As the DEIS clearly indicates, only economic considerations have been raised as a defense to the logic otherwise supporting the no-build alternative. The exclusive reliance of the DEIS draftsmen on economic considerations squarely contravenes state law and renders the EIS wholly inadequate.

3. THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FAILS TO FULLY AND ACCURATELY DESCRIBE THE PROBABLE IMPACT OF THE PROPOSED ACTION.

A. The EIS fails to adequately assess the adverse impact of noise.

The EIS states that anticipated noise levels from the freeway will range from L_{10}68 dBA to L_{10}77dBA without abatement. Such noise levels clearly exceed the state standards contained in Minnesota Pollution Control Agency regulation NPC 2, which limits noise at the boundary of the receptor property for residences to L_{10}65dBA from 7 o'clock a.m. until 10 o'clock p.m. and L_{10}55 dBA from 10 o'clock p.m. to 7 o'clock a.m. The DEIS cites the state standard of L_{10}65dBA in an obscure footnote, but fails to state that a variance is required from the MPCA before construction of the freeway may commence. The DEIS makes the conclusory statement that abatement of the noise is possible and that "the proposed highway will have noise walls and landscaping where necessary." (DEIS, p. 78.) The DEIS does not discuss the extent of the amelioration provided by such noise reduction facilities, nor does it appear from the DEIS that such facilities will succeed in complying with the state regulations cited above. Such an omission is critical, since figures 4-1 and 4-2 show that a substantial amount of land presently undeveloped is intended for residential development. Moreover, the DEIS admits that the freeway has a "rural" design, despite the fact that the principal argument for its construction is the increasing urbanization of northern Dakota County. This inconsistency highlights the need for a thoroughgoing analysis of the noise impacts and the efficacy of proposed mitigating measures. The mere reference in Table 6-8 to "abatement" is insufficient.

The DEIS also attempts to minimize the adverse noise impact by listing the number of homes presently affected by predicted noise levels. However, Table 6-8 containing these calculations is grossly misleading, since predicted noise levels are given for the year 2000 and the number of houses affected is based on present statistics. If the development predicted for this area occurs, the number of residences affected by construction of the freeway will increase substantially beyond the meager figures listed in Table 6-8. Such an omission typifies the statistical contortions used to justify construction of the freeway along the proposed corridor. Such an analysis does not fullfil the obligation of the preparer under either the Minnesota Environmental Policy Act or the National Environmental Policy Act.

B. The draft Environmental Impact Statement fails to consider the environmental impact of predictable increased future development.

Great portions of the environmental impact statement are used to describe the industrial and residential development that would occur as a result of the construction of I-494. Yet no where does the EIS address the adverse environmental impact of such development. Such an omission is a plain violation of MEQC 30(D)(6), which requires that an EIS contain information concerning "the relationship between local short term uses of the environment and the maintenance and enhancement of long term productivity, including the environmental impact of predictable increased future development of an area if the action is implemented." In the instant case, it is clear that construction of I-494 will induce a great deal of commercial, industrial, and residential development in northern Dakota County. The draft EIS is fatally deficient in its failure to discuss these impacts.

Among impacts which will result from this development are increased air pollution resulting from increased automobile traffic, increased noise pollution, additional destruction of wildlife habitat and wetlands, and similar effects. It is apparent from a comparison of figures 4-1 and 4-2 that a large amount of presently undeveloped land will be devoured by the predicted future development induced by construction of I-494. The large amount of land which will be newly developed indicates that such impacts will be substantial and that they cannot be ignored in considering the impacts of constructing the freeway.

This is particularly the case with respect to the Eagan industrial park located at the proposed interchange of I-494 and I-35E. There is no effort made in the EIS to catalog the types of industries which will locate in this park.

Table 4-2 indicates that substantial additional residential construction will occur. Yet, the EIS does not indicate whether sewers are in place to serve such development or whether other community services are adequate. At page 67, the DEIS notes only that "most all the cities indicate some provision for these expanded services in their comprehensive plans." No effort is made to describe the extent of these provision or to estimate the adequacy of presently proposed community services.

SUMMARY AND CONCLUSION. The DEIS fails to document a need for the proposed construction of I-494. The principal reason advanced for this construction of the freeway is the economic betterment of the community of northern Dakota County; such an argument is circular and contravenes the Minnesota Environmental Policy Act. The DEIS fails to examine other corridors, design alterntaives, and does not properly analyze the no-build alternative. The DEIS fails to properly assess the adverse environmental impact of the proposed freeway, particularly the impact of noise on residences adjacent to the freeway.

The DEIS contrasts sharply with the standards for such documents set forth by the United States Court of Appeals in the Silva v. Lynn, 482 F.2d 1282 (1st Cir. 1973):

> "The 'detailed' statement required by Section 4332 (2) (C) [102(2)(C)] serves at least three purposes. First, it permits the court to ascertain whether the agency has made a good faith effort to take into account the values NEPA seeks to safeguard. To that end it must 'explicate fully its course of inquiry, its analysis and its reasoning.' Ely v. Velde, 451 F.2d 1130, 1139 (4th Cir. 1971); [citing cases] Second, it serves as an environmental full disclosure law, providing information which Congress through the public should have concerning the particular environmental costs involved in a project. To that end it 'must be written in language that is understandable to non-technical minds and yet contains enough scientific reasoning to alert specialists to particular problems within the field of their expertise.' Environmental Defense Fund v. Corps of Engineers, 348 F. Supp. 916, 933 (N.D. Miss. 1972). It cannot be composed of statements 'too vague, too general and too conclusory'. Environmental Defense Fund v. Frohlke, 473 F.2d 346, 348 (8th Cir. 1972). Finally, and perhaps most substantially, the requirements of a detailed statement helps insure the integrity of the process of decision by precluding stubborn problems or serious criticism from being swept under the rug. A conclusory statement 'unsupported by empirical or experimental data, scientific authorities, or explanatory information of any kind' not only fails to crystallize issues, Natural Resources Defense Council v. Grant, 355 F. Supp. 280, 287 (E.D.N.C. 1973), but 'affords no basis for a comparison of the problems involved with the proposed project and the difficulties involved in the alternatives.' Monroe County Conservation Council v. Volpe, 472 F.2d 693, 697 (2d Cir. 1972). Moreover, where comments from responsible experts or sister agencies disclose new or conflicting data or opinions that cause concern that the agency may not have fully evaluated the project and its alternatives, these comments may not simply be ignored. There must be good faith, reasoned analysis in response."

Judged by this standard the DEIS is clearly inadequate and must be extensively revised before this project can be commenced.

Respectfully submitted,

DAYTON, HERMAN & GRAHAM

Philip W. Getts
Attorneys for the Dakota County
Environmental Protective Association

PWG:jab

RESPONSE TO DAYTON, HERMAN, AND GRAHAM

A

The need for I-494 was not based entirely on existing and proposed development in the project area, although I-494 is one of the important elements of the northern Dakota County roadway system (I-35E, TH 3, and the Mendota Bridge-TH 55-TH 110 intersection are the others). The proposed link also has broad metropolitan and interstate significance.

As part of the belt-line route, the proposed highway will serve major urban travel by helping to distribute traffic to and from key traffic generators in the metropolitan area. Consisting largely of truck traffic and daily commuter trips, this regional traffic constitutes about 65% of the traffic using this section of the belt-line route. The "through" traffic movement, though small by comparison (35%), is also an important aspect of travel on this section of the route, since it involves a high percentage of trucks transporting essential goods and produce. By using the belt-line route, the through traffic is able to by-pass the urban centers. This is true for traffic entering the region on both I-35 and I-94.

Development in areas where growth is planned for and guided can not be properly termed "urban sprawl." The term urban sprawl is appropriate when extensive development occurs in undeveloped areas without prior planning, creating the need for a skeletal system or roadways, sewers, water connections, and other utilities. In this respect, a major roadway in an undeveloped area, because it can trigger development, can be the cause of urban sprawl.

As the DEIS indicated, the project area is well within the Metropolitan Urban Service Area (MUSA), areas which have — or are designated to receive — public service facilities. (The Metropolitan Council has estimated that the region will save about $2 billion dollars in expenditures for public facilities by restricting growth to MUSA areas. Restricting growth to MUSA areas will also mean considerably less of an impact on natural resources.) Dakota County and most of the cities in the project area want and, with the MC's approval, are planning for the projected development. Since I-494 is an integral part of this comprehensive planning, its Mn DOT's responsibility to participate in the planning for — and to develop — the proposed highway.

The Metropolitan Sports Complex, Fort Snelling, Fort Snelling State Park, and the Minnesota Zoological Garden are all served (or will be served) by major highways. Some of the highways serve these facilities directly, others indirectly. For the zoo, although I-35E and Cedar Av will provide the north-south access, I-494 will help provide access from the east and west to I-35E and Cedar Av.

B Although the Metropolitan Sports Commission has considered several possible locations for the stadium, they have not chosen a definite location for it as yet. Locations discussed have included downtown Minneapolis, Eagan, and the current site. As we have indicated, however, the stadium is only one of many major facilities in the project area. If it's relocated, other generators remain, the principal ones being the airport and the industrial parks and commercial centers near the inplace and proposed sections of I-494. It's the work and business-related trips that these facilities generate, that create the primary transportation demand for I-494. Therefore, moving the Sports Complex out of Bloomington will neither change the need for, nor the design of, I-494.

The MC's newest (and lower) population and employment estimates for the I-494 project area are being incorporated into new traffic forecasts. The new projections appear on p 33.

C Although the new projections indicated that a lesser design for I-494 would be adequate, they still indicated a definite need for proposed I-494. The selection of Alt B3 as the build-alternate rather than Alts B1 and B2 was based in part on the new projections.

(In their response to the DEIS, the MC stated the following: "New population, household, and employment forecasts will be adopted later this year [1977] which should be used for planning purposes. Their implication is that the I-494 area will continue to be a relatively high growth area as the EIS assumes but in absolute terms the amount of growth will be somewhat less than assumed. In other words, the trend is the same as before but the amount of increase has become smaller.")

The 70 mph design speed is independent of the posted speed limit. Under current law the posted speed limit will be 55 mph.

Design speed is based on safety features such as sight distances over a hill or around a curve. With the posted limit at 55 mph, the longer sight distances and other safety standards of the 70 mph design speed will provide a greater margin of safety than would be possible with a 55 mph design speed.

D The flatter grades and reduced curvature of the 70 mph design speed will allow a smoother flow of traffic movement and will increase the operating efficiency of vehicles by reducing fuel consumption, tire wear, and other operating costs.

Reducing the design speed would not necessarily result in a reduction of the number of lanes required, as traffic volumes determines the number of lanes. Neither would it necessarily reduce the amount of right-of-way required. Although the flatter grades of a higher design speed may require more earthwork, and thus wider construction limits, the increased curvature of a lower design speed may result in a longer roadway between endpoints.

(In a policy statement on the design speed for highways and the nationwide 55 mph speed limit, the American Association of State Highway and Transportation Officials states that ", . .even though operational traffic speeds and speed limits have been reduced, design speeds and other design standards [should] not be reduced.")

The discussion on Alternate A was intended only to show why it was dismissed from consideration as a feasible and prudent alternative early in the planning. The viable alternatives were the design alternates within the Preferred Corridor. As the DEIS indicated, the Preferred Corridor is the product of years of planning and has the approval of the MC and most of the cities in the project area.

E In response to your comment, we have made a table comparing the preferred corridor with Alt A — the Historic Alternate — and the alternate that you've designated the "Highway 55 Alternate" (see Table 11-1, p 156). We've also made a line drawing of the Highway 55 Alternate, using your description of the corridor location (Fig 11-1).

TABLE 11-1*
COMPARISON OF IMPACTS
Alt A, Alt B, TH 55

OPTION	ALT A	ALT B	T.H. 55
Total Area (in acres)	861	716	837
Open land (1)	517 (3)	432	420
Roads	172	105	127
Developed land (2)	133	89	171
Woodland	32	66	66
Wetland	7	16	41
River (4)			12
Lake		8	
# Woodlands	9	15	22
# Wetlands	7	14	15

* From 24th Av in Bloomington to the I-494 and I-35E interchange, Alt A, Alt B, and TH 55 would run on the same alignment and would have the same impacts. These impacts are not included in this table. Impacts shown in the table occur from the interchange eastward to the Mississippi River.

#Woodlands and #wetlands (bottom of table) indicate actual number of woodlands and wetlands impacted.

(1) Open land includes undeveloped area, openfields, agricultural lands, highways and railroad rights of way, and golf course.

(2) Developed land includes commercial and residential areas but excludes all roads except residential streets and driveways.

(3) This acreage includes 46 acres of the Mendota Country Club.

(4) Construction on Alts A & B is assumed to stop at the west end of the Mississippi River Bridge. If the construction is extended into T.H. 61 (east of the Mississippi River Bridge), 10 acres of the river would be impacted under both alternates.

E

We do not consider Alt A a good location for the proposed section of I-494 for the following reasons —
— It's contrary to the MC's transportation plan for the region (see Fig 1-3, Functional Classification Plan, p 13).
— It's contrary to the comprehensive plans of Dakota County and all the cities in the Project Area.
— It would create severe negative economic and traffic associated impacts on Mendota Heights, Mendota, and West St Paul.
— It would not provide good access to the industrial parks in Eagan.
— It would negate nearly 20 years of planning to locate this section of I-494 along the Preferred Corridor.

We don't consider the "Highway 55 Alternate" a good location for the proposed section of I-494 for the following reasons —
— It's contrary to the Metropolitan Council's Transportation Plan for the region (see Fig 1-3, Functional Classification Plan, p 13).
— It's contrary to the comprehensive plan of Dakota County and all the cities in the project area.
— It negates nearly 20 years of planning to locate this section of I-494 along the Preferred Corridor.
— It's indirect, will entail much higher construction costs, and will cause much more severe impacts on the natural and manmade environment than Alt B3, the Selected Alternate. This alternate would remove about 105 more residences and 44 more businesses than B3. It impacts 32 more acres of wetland and 116 more total acres than B3.
— It would cause major disruptions to development in the cities of St Paul Park and Newport, neither of which, to our knowledge, have planned for a interstate through its city.

ALTERNATE A

PREFERRED CORRIDOR (ALTERNATE C)

T.H. 55 ALTERNATE

ALTERNATE A

T.H. 55 ALTERNATE

PREFERRED CORRIDOR

N

0 2000 4000

INTERSTATE 494

FIGURE 11-1

Mn DOT's studies and those of the MC's Interstate Study Committee indicated that I-494 through this area should be a six-lane freeway. Preliminary reports indicate that the new traffic forecasts (based on the new projections), although lower than those used in the studies for the DEIS, are still sufficiently high enough to require a six-lane freeway through the proposed corridor.

The No-Build Alternate (TH 5-Mendota Bridge-TH 110 link) cannot safely and efficiently accommodate the existing or projected traffic volumes. Extensive reconstruction would have to be done on the Mendota Bridge and TH 110. Even then, an acceptable standard of efficiency and safety could not be achieved, considering the number of major highways that converge in this area and the high volumes of traffic projected for the highways.

F

As the DEIS pointed out, the Mendota Bridge frequently has stopped traffic conditions as a result of congestion, and the accident rates along the section of highway just east of the bridge, along the Mendota Bridge Intersection, ranks among the highest in the metropolitan region. The projected traffic volumes indicate inoperable conditions along this section without proposed I-494 to pick-up the east-west, belt-line traffic.

The preliminary design has been developed to resolve the traffic problems at the Mendota Bridge Intersection (p 19 of the DEIS). The design conforms to the MC's Functional Classification Plan (FCP) and has been developed in consultation with the local communities and Dakota County. A basic assumption of this design is that the system of highways in the FCP would be completed, including the proposed section of I-494.

This design includes some reconstruction of TH 110 (from Lexington Av to existing TH 13), TH 13 (a relocated section from Lemay Av to proposed I-494), and TH 55 (from TH 110 to just north of the proposed I-35E and I-494 interchange). No upgrading is planned for the Mendota Bridge or for the section of TH 110 between Lexington Av and TH 52. Any major upgrading of these highways would be contrary to the current and future functions that the MC has designated for them (see Fig 1-3, FCP, p 13).

Although adopting the no-build would mean less of an impact on wetlands and undeveloped land, it would mean an increase in air and noise pollution, since a much larger amount of traffic would be faced with the stop-and-go situations along the existing link (TH 5-Mendota Bridge-TH 110). More residences would be directly impacted by these increases. Under the No-Build, 155 residential uses would be impacted by noise as compared to 41 under Alt B3.

G

Our analysis of the Alternates considered a number of impacts in addition to the environmental and economic ones. As we have indicated, the affects of the alternates on comprehensive planning was a major consideration. But safety was also an important consideration in the analysis. The continued use of the existing corridor as the link between the completed section of I-494 would mean continuing to subject the motoring public to traffic conditions that have a high potential for accidents. As the DEIS indicated, accident rates along sections of this link consistently rank among the highest in the Metropolitan Area.

Although the range of noise impacts will extend to L_{10} 77 dBA, our noise abatement plan will attempt to reduce traffic noise levels to L_{10} 65 dBA, the State daytime standard for residential uses. Where this is not feasible — because of the difficulties involved in constructing mounds or walls for some small, isolated residential uses — Mn DOT will request a variance from Federal or State Standards, or both. The EPA reviewed our noise report for proposed I-494 and indicated that they did not expect any adverse noise impacts from the proposal.

H

The Federal Highway Administration (FHWA) does not require noise abatement measures for land that is undeveloped on the date of public knowledge of the project, unless one of the following situations exist: "the development was planned, designed, and programmed before the highway studies and there is firm evidence that the development has been only temporarily delayed, or the development is planned, designed, and programmed during the highway project planning and design; there is a very high probability of the development being constructed; and the developer has considered the noise impacts to the extent reasonable and practicable." (From Federal-Aid Highway Manual, Vol 7, Chp 7, Sec 3. Transmittal 192, 14 May 1976).

H The FHWA does, however, encourage highway agencies to assist local communities in planning for compatible development in undeveloped areas near highways. Mn DOT will do this by consulting with the local agencies and communities about our noise-abatement plans as the project develops. We will furnish the communities with an assessment of noise impacts along the corridor and, when appropriate, make recommendations for land-use in these areas.

The land-use controls of the local municipalities and the MC will be the determining factors in preserving the natural environment in the project area. Most of the cities recognize the need for planned, guided growth, particularly since the area is one in which extensive growth is likely to occur. Thus far, development has occurred without the destruction of the natural environment, as evidenced by the numerous wetlands and wooded areas that remain.

Generally, Mn DOT, in conjunction with the MC, can estimate the magnitude and types of development and the resultant trip generations (number of vehicles per day) that will occur in a given area. These estimates are based largely on development that has occurred in similar areas in the region under similar conditions. But we have no way of identifying the particular industries that will locate in an area, particularly in a large park like the Eagandale Industrial Park. In some instances, local municipalities and developers know that certain companies will locate in an area because of prior contacts and commitments. Usually, however, the municipalities and developers do not know who the occupants of a large industrial park will be until a short time before the actual development occurs, and then largely on a one-by-one basis.

As the DEIS indicated, not constructing I-494 would mean a reduction in the development likely to occur in the project area. Considerable development would still occur, however, resulting in much larger volumes of traffic on existing roads and a corresponding increase in congestion — thus the reason for the MC, Dakota and Hennepin Counties, and the local municipalities including the proposed section of I-494 in the systems of roads planned for the area.

The MC and the project area cities have considered community services and energy, water, and sewer needs, and have deemed them feasible to meet, as indicated by their inclusion of the area in the urban service area.

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR I-494

Sherman K. Headley
Rt. 24
South Saint Paul, Mn. 55075

10/11/77

INTRODUCTION

Although I have previously deplored the limited amount of time accorded me, an others, to examine the Draft Environmental Impact Statement in regard to the proposed route of I-494, I feel that I must at least express some initial views in regard to the Draft EIS.

There is one major, over-riding fault with this Statement. You have used it negatively whereas it should be, or should have been, used in a positive manner. This approach, more than any other fault in the Statement, lays the whole Draft EIS open to challenge.

HIGHWAY #110

Twenty-seven years ago (1) the Department of Highways proposed a corridor along present Highway 110. It was a logical route since the Highway Department owned the right of way along the proposed route. A Nowhere in the present Draft EIS is detailed the political force or the population shift which dictated the move away from that corridor which the Department felt was the appropriate one in 1955. The "Advantages of Alt A" shown on page 53 of the Draft EIS do not address themselves to these matters nor do those "Disadvantages of Alt A" detailed on page 54.

ECONOMIC IMPACT

B Notably deficient in this Draft EIS is examination of the economic environmental impact of I-494. The Department of Transportation has made some self-serving references about industrial development if the proposed route is followed, but it has made no economic comments in regard to the economic advantage of the taxpayers in regard to the various alternate routes which are available and which have not been examined. Certainly, the cost of highways has a major impact upon the citizens of Minnesota, and in view of the source of highway funding, upon the citizens of the United States. In the Draft EIS the DOT has examined only minor deviations from its preferred route and has tried to obfuscate the fact that, really, no alternative routes were examined. In view of the economic effect, the report is completely deficient in regard to an examination of the economic impact variations in regard to the proposed

Page Two

route, the route (Alt A) first proposed along Highway 110, and the much-discussed route along Highway 55. Both of the latter routes would seemingly require much less acquisition of land, and both routes would follow the Federal requirement of recycling existing highways whenever possible.

The DOT in the I-494 Draft EIS has addressed itself only to the question of the impact of the proposed route on land developers and industrial or commercial complexes, but it has said nothing about the economic impact, favorable or unfavorable, upon the taxpayer, State or Federal.

B

In Paragraph (4) on Page 54, wherein you speak of the adverse "affect"....and I think you mean "effect"....upon existing and proposed development in Eagan (Dayton's again?), you raise the issue of economic impact but try to lay the big question to rest with only a partial answer. You people have raised the issue, and you must, therefore, cover the whole area and not just those areas wherein you have interest or where influence has been exercised upon you.

The question must be answered: What is the economic impact (not just on commercial/industrial interests) of the three alternate routes....Highway 110, your proposed, and the Southern Route along Highway 55 to the area of 80th Street?

RECYCLING

C

The Draft EIS has in no place addressed itself to what I understand is a requirement that existing Federal and State highways be "recycled" whenever possible. It is my further understanding that Federal laws and regulations require that you examine alternative routes, and I contend that the Draft EIS has not so done.

COMPREHENSIVE PLANS

D

In (2) on page 54 you rather gratuitously allow yourselves to talk about the comprehensive plans of Mendota Heights, West St. Paul, and Sunfish Lake and put the fact that Sunfish Lake changed its plans as an obscure footnote on Page 50. To my knowledge, there is nothing that would prevent Mendota Heights or West St. Paul from changing their comprehensive plans. They were not carried down from the Mount.

Page Three

DEATHS AND ACCIDENTS

E

In Table 1-1 on Page 9 and in Paragraph (3) on page 54, the DOT presents only part of the story of deaths and accidents. The proposed construction runs from river to river, but Table 1-1 fails to show the accident rate between Babcock Trail and the Mississippi River. Further, the Draft EIS is deficient because it does not present projections showing the probably decline in death and accident rates if I-494 is built along the Southern Route (Hiway 55). I speak, of course, of the decline in rates along Highway 110.

HIGHWAY 55

F

It should be pointed out that if the DOT is, indeed, concerned with a positive development in Eagen that there is a more desireable corridor than either Alt A or the misconceived proposed route. It has been adduced many times, but the present Draft EIS not only does not examine it, it just ignores it totally. To me, this appears to be a lack of responsiveness to the many people who have examined this alternate route, but it also appears to be a lack of commonsense and a total disregard of Federal guidelines. The Draft EIS says absolutely nothing about the most desireable route which would best serve that development in Eagan, and that is a corridor along Route 55.

In an exchange of significant and responsive letters with then Governor Anderson, in luncheon conversations with the then Commissioner of Highways, in public hearings, and in conversation with Highway Department officials, I have tried, as have others, to show the wisdom of a route along Highway 55. The important thing here is that there have been many and very substantial presentations to authorities on all levels proposing that route, and the Draft EIS makes not one, single reference to that route. It is my understanding that you have a complete obligation to examine alternative routes, and yet you make no mention, whatsoever, of the route that has been presented to you time and again.

To me, it presents itself as the ideal route. It better serves the community as a whole, including commercial/industrial interests. It would appear to erase most of the political problems.

Page Four

F

One cannot help but feel that you people have been dreadfully remiss in not examining this alternate route and not advising the people in Washington concerned with the distribution of Federal highway funds of this possibility. A little minor deviation here or there from your preferred route cannot be considered, in any way, an examination of alternate routes. Your Draft EIS cannot be accepted, in any respect, as one which has examined all alternatives.

POPULATION PROJECTIONS

G

Table 3-2 (page 33) tells me something that it seemingly has not told you. You have used the projections of the Metropolitan Council, and they show that the greatest population increases by the year 2000 art to the south of your proposed route, and they show a decline in the population of South Saint Paul. Environment to some people may be an absence of roads near their homes, but to the great majority of people, part of the environment in which they live is the ability to get to and from their homes, and yet you propose to build a road which is away from the population growth. Additionally, in incomprehensible manner, you propose to build it to serve better the people of South Saint Paul, the only Metropolitan city projected to show a population decline while people down river, who need a river crossing and better access, are increasing in number.

In addition to Table 3-2, you present two maps following page 44 (Figures 4-1 and 4-2) which support the population distribution point adduced above. Without great study, Figure 4-1, the Existing Land Use, seems to portray conditions today. For so much as it covers, Figure 4-2 seems likely to portray Proposed Land Use, but it is incomplete. To meet the environmental needs of the population, the map is totally deficient. Without extensions to the East and to the South at least another ten or fifteen miles, this map cannot be considered acceptable.

H

Perhaps we should quote here the definition of environment: "Environment is the aggregate of surrounding things, conditions, or influences, esp. as affecting the existence or development of someone or something."

I submit that by not examining the alternate route along existing Highway 55 to 80th Street in light of your own population figures, you have a faulty Draft EIS.

Page Five

COMMERCIAL/INDUSTRIAL

H

These same two maps, Figures 4-1 and 4-2, show not only limited study of the environmental needs (as defined above) of Commercial and Industrial operations, but they seem to give strong evidence that your proposed route is along a line based on ancient research rather than on the best and latest information available.

Could you not better serve Commerce and Industry as shown on your maps by using Highway 55 with a river crossing at or south of 80th Street and connecting to existing 494 east of South Saint Paul via Highway 61 which you are going to upgrade anyway? This would provide far better service to the illustrated Commercial/Industrial areas. Failure to follow such a route lacks positive environmental impact which commerce and industry need and creates negative environmental impact for those people along your proposed route.

As with our comments under Population Projections, Figure 4-2 does not cover enough area to the East and South to get a complete picture.

NOISE

I

Minimal effort appears to have been made, if one may judge by the Draft EIS, to the question of noise. One more qualified than I would have to say whether or not the location and limited number of noise sensors is adequate, but even I can see the the EIS did not deal with the noise generated by aircraft using Minneapolis-St. Paul International Airport. Once again I can look at you maps, and I see that the main airstrips at that airport are in virtually direct alignment with Highway 55. Your map fails to show the aircraft radio beacon located along Highway 55. Your Draft EIS gives no figures whatsoever about the aircraft landings and even noisier takeoffs from Wold-Chamberlain Field, nor is there any indication that you gave any study to those patterns. Why is there no study of a consolidated "noise corridor" combining the noise generated by both aircraft and highway vehicles?

Your noise studies, I believe, should also show what changes there would be in noise levels at the three route locations which should be considered: Highway 110, your proposed route, and the Southern Route. What is the positive/negative effect on the other two locations if 494 is built on any one of the three?

Page Six

ALTERNATE ROUTE STUDIES

J

Your "alternate routes" are but minor variations on the same theme. With a multitude of tables, maps, graphs, and narrative sections you debate these various "alternate routes", but you obviously have not studied Alternate A (Highway 110) to the same extent that you have studied your proposed route, and you have given absolutely no study, whatsoever, to the most logical route, the Southern Route along Highway 55. Am I not correct in thinking that Federal Regulations or Federal Law requires you to give equal study to all alternate routes?

CONCEALED PLANS

K

L

Some reference has been made in this commentary to plans which the DOT reportedly has which would have some effect upon your proposed route for 494, as well as alternate routes, but which are not contained in your draft statement. Do you not have plans, for instance, to modify the intersection at the easterly end of the Mendota Bridge? Would that not change the story told in Table 1-1 on Page 9? Shouldn't that be noted? What other plans do you have for 110 if 494 is built that should be included in the EIS? I believe that you have plans, as mentioned, to upgrade 61 south of South Saint Paul. What effect will that have? Will changes in 110 or 61 (or other changes which are unknown to me) have marked effect upon your EIS? What will an extension of Highway 3 do to your statement? What would be the environmental effect of making the existing 494 bridge at South Saint Paul westbound in all lanes, running the traffic down the extension of 3, with a new bridge at 80th Street all eastbound? Would it change the existing accident rate at the South Saint Paul bridge, a rate which you fail to mention? Do you have any other plans, revealed or concealed, which have any bearing on this section of 494 and a determination of which of the three routes will be used if the road is built? In any court action, under oath, can DOT officials swear that they never discussed the Southern Route? If the answer were "yes" it would be an admission of poor planning, and if the answer were "no" it would be an admission that no environmental study had been made which was complete.

Page Seven

CONCLUSION

M

The Draft Environmental Impact Statement is deficient in itself in examining the DOT's proposed route. It has used it only as a protective device rather than as a positive development of value to the community.

It is further defective and deficient in that it has not examined very logical alternative routes for I-494. Can the DOT really believe that the cursory comments about Highway 110 potentiality are an honest examination of alternative routes? Can no examination of Highway 55 routing be considered to meet Federal requirements that all alternate routes be examined?

The Draft EIS almost completely ignores the economic environmental impact of the proposed and ignored alternate routes. The Statement, therefore, is deficient.

The Statement gives no recognition to the Federal requirement to examine in detail the possible recycling of existing roadbeds, and it is, therefore, again deficient.

In that the Statement details only the past history of only certain portions of the death and accident rates on existing Highway 110, it is further deficient. No comparison is developed on such rates for alternate routes or for existing and future projections for the present bridge at South Saint Paul, for a modified 110, for a modified intersection at the Mendota Bridge, for a modified 61, for the Southern Route, or for any unrevealed plans.

Tables and maps are presented in regard to commercial and industrial use and the spread of population only to try to justify the proposed route, but nothing is brought forth to show how the same exact information could be used to argue even more effectively for the Southern Route.

The Draft Statement is patently deficient in its comments and research on noise pollution.

The Draft EIS cannot be considered complete unless all concealed or unannounced plans for highway development, modification, and resign in contiguous areas are included. They all have substantial impact upon all three possible routes, and without that information, it is impossible for those of us who question the proposed route to see the whole picture. Without that information, it is also impossible for those people who must examine the EIS in official capacity to do their jobs properly.

Page Eight

N

O

Because time for respondents is unduly limited, it has not been possible for me to do a complete response. For instance, in the present situation of oak wilt and Dutch elm disease striking heavily in this area, why does the EIS make no mention of the comparative impact of the percentage decrease in the number of trees and other oxygen producing vegetation that the construction of I-494 will make along the proposed route in comparison with no-build or alternate routes? Why is there no information about a route along Cliff Road? I don't have the time to develop any thoughts about this between now and the deadline for filing comments, but you have had years.

Two things I think that I can rightfully demand. A copy of this statement should be included in the final Environmental Impact Statement, and a copy should immediately be sent as well to all of the parties who voiced no initial and official objection as the Draft was being prepared. Secondly, in view of the extremely limited amount of time which was accorded those who wished to respond to the Draft Statement, I believe that I am entitled to amend and supplement these comments beyond the October 15 deadline. Absence of word from you containing justifiable reasons why this is not possible will, in my consideration, constitute acquiescence.

RESPONSE TO SHERMAN HEADLEY

A As the DEIS indicated, the Alt A corridor was first identified by the Bureau of Public Roads as part of an Interstate Study in 1955. This Study consisted of general concepts and was not intended to be binding on local and State governments (DEIS, p 50). From the late 1950's through 1972, most all the planning for I-494 centered around the Preferred Corridor. Local and Regional comprehensive plans were based on this alignment.

The DEIS did not give a cost comparison between Alt A and the Preferred Corridor because Alt A was not presented as a viable alternate but was considered from a historic standpoint. Based on regional and local comprehensive planning and development, the feasible and prudent alternatives were the design alternatives within the Preferred Corridor.

B Because it requires less land than B3, the Selected Alternate, Alt A would cost less to construct (1977 estimates indicate that Alt B3 will cost about 80 million dollars). Locating the proposed highway along TH 55 would cost considerably more than B3, since this corridor is about 7 miles longer than the Preferred Corridor, and would impact major development along TH 55 and in the central districts of Newport and St Paul Park and would include an additional river crossing. (See Dayton, Herman, and Graham, Response E, p 155).

For proposed I-494, the "recycling issue" (the use of existing highways whenever possible, with improvements if necessary) would apply to the Alternate A consideration. We did not consider Alternate A a viable alternate for the reasons stated in Response A and B above; in Response E to Dayton, Herman, and Graham (p 155); and on page 53 of the DEIS.

Part of the criteria which Federal Regulations have established for the consideration of Alternatives is as follows:

C "This section shall include a discussion, with maps and other visual aids, as appropriate, of the reasonable alternatives studied in detail, including those that might enhance environmental quality or avoid some or all of the adverse environmental effects. Examples of such alternatives include alternate locations and designs, not implementing the proposed action, postponing the action, providing a lower level of service, providing a reduced facility (lanes/design), and an increase or decrease in public transportation." (Federal-Aid Highway Program Manual. Volume 7, Chp 7, Sec 2, Paragraph 19J).

For the reasons indicated in Response C above and in Response E to Dayton, Herman and Graham, Mn DOT considered the design alternates within the Preferred Corridor the viable build-alternates for proposed I-494.

D Mn DOT's policy is to develop highway plans in close coordination with local cities and regional planning agencies. Although Mn DOT can suggest changes if planned land-uses for adjoining land conflicts with an existing or proposed highway, it cannot recommend that cities change their entire comprehensive plans. From a practical standpoint, such a recommendation would probably never be necessary, since most cities in the seven-county metropolitan area have coordinated their plans with the Metropolitan Council (MC), Mn DOT, and other regional agencies. Thus, not only have local comprehensive plans been developed but regional ones as well (the MC's Metropolitan Development Guide, for example).

From 1972 to 1975, the 5.9 mile section of TH 110 from TH 55 in Mendota to I-494 in So St Paul had an average accident rate of 2.31 per million vehicle miles. (DEIS, p 6).

E Mn DOT has no way of predicting what the decline in accident rates would be if I-494 were constructed along TH 55, County Rd 80 and TH 61 through Newport and St Paul Park .

I E One conclusion that might be drawn, however, is that because a highway along this southern route would be more indirect than one along the Preferred Corridor, traffic going to and from Mendota Heights, West St Paul, and So St Paul might be inclined to continue using the existing link. Consequently, the traffic volumes and accident rates along the existing link would be higher than they would be if I-494 is constructed along the Preferred Corridor.

F See Response D above and Response E to Dayton, Herman, and Graham (p 155).

G Although So St Paul's projected population shows a slight decrease, the So St Paul Stockyards and other existing and proposed major industries will continue to make the city one of the major traffic generators in the State. As the DEIS indicated, the proposed section of I-494 and the related construction are needed to imporve traffic flow and safety in this area.

Neither Mn DOT's transportation studies nor the Metropolitan Council's Function Classification Plan or Development Framework Guide indicate a need for a Mississippi river crossing south of the existing I-494 crossing in the Seven-County Metropolitan Area. These studies are based on existing and projected population, dwelling units, and employment figures.

H Figures 4-1 and 4-2, pages 45 and 47, show land-use in the cities that have been involved in the planning for the section of proposed I-494 — Bloomington, Eagan, Mendota Heights, Sunfish Lake, Inver Grove Heights, and So St Paul. The maps depict enough of the cities to allow reviewers to relate existing and proposed development to the proposed section of highway.

Relocating I-494 along the southern route would not provide access for the commercial and industrial development in Mendota Heights, West St Paul, Inver Grove Heights, and So St Paul. Also, it would cause direct impacts on Eagan's existing and proposed industrial and commercial areas. It would also cause severe negative impacts on the residential, commercial, and industrial development in the cities of Newport and St Paul Park, and Cottage Grove (Fig 11-1, p 157), neither of which has planned for an Interstate Highway through its city.

I During the preparation of the DEIS, Mn DOT's District 9 Noise Unit met with the Airport Commission on the issue of noise as it relates to proposed I-494 and existing noise impacts from aircraft in the project area. Information from this meeting appeared in the "Noise Analysis Report for I-494." The material in the DEIS on Airport Influence, p 85 , was summarized from the noise report. As the DEIS indicated, one area containing three homes is currently impacted by aircraft noise and would be impacted by proposed I-494 and, thus, could not be brought to acceptable noise levels because of this double impact (Table 6-8, p 85, site number 11) This impact occurs along a section of highway common to Alt A, the southern route, and the Preferred Corridor. The DEIS also points out that other land tracts adjoining the proposed I-494 alignment and influenced by aircraft noise is zoned light industry, a compatible land use.

For the reasons cited in Response C above and Response E to Dayton, Herman, Graham (p 155), our noise studies were made based on the Preferred corridor and the No-Build.

J See Response B and C above and Response E to Dayton, Herman, and Graham.

K Pages 18 to 20 of the DEIS indicates the construction and reconstruction planned for project area highways, including the improvements on the intersection at the east end of the Mendota Bridge (which includes some reconstruction on TH 110) and the proposed construction of TH 3 south of TH 110.

The City Council of Cottage Grove (Washington County, east of the project area) has reviewed and approved the proposed reconstruction of 5.1 miles of TH 61 in Cottage Grove. This reconstruction upgrades this section of TH 61 from expressway to freeway standards.[1] The proposal has undergone the

[1] Expressway: A divided arterial highway for through traffic with either full interchanges or at-grade intersection.

Freeway: An expressway with full interchanges.

A-95 Review[2] and has been determined consistent with the development framework policies of the Metropolitan Council. On December 1975, Mn DOT (then the Minnesota Highway Department) held a combined location and design public hearing in Cottage Grove on this section of highway.

K As the DEIS indicated (p 11), proposed I-494 is part of the Functional Classification Plan (FCP), the regional transportation plan which the MC, Mn DOT, and cities and counties in the seven-county Metropolitan Area have developed.

The analyses in the DEIS — traffic forecasts, air and noise, projected development — were based on the FCP being completed as planned.

Adopting your suggestion to make the existing I-494 bridge in So St Paul westbound in all lanes and a new bridge crossing at 80th St all eastbound, with proposed TH 3 providing a connection, would not be good highway design, neither from a traffic flow or environmental standpoint. Such an alternate would mean about a three-mile separation between the eastbound and westbound lanes of the highway. Eastbound traffic wanting to reach West St Paul and So St Paul, would have to travel an additional 7 to 10 miles (when compared to Alt B3). Considering the volumes of traffic entering and leaving So St Paul, this additional mileage would mean a considerable increase in energy use.

In all probability, additional lanes would have to be planned for TH's 3 and 61 to accommodate the increase in traffic volumes that would result from routing I-494 along these highways. Currently, plans are for TH's 3 and 61 to each have four lanes. Additional lanes on proposed TH 3 would result in severe social and environmental impacts in Inver Grove Heights, as the cities comprehensive plans have been developed based on 4 lanes for the proposed highway. Similiarly, an interstate through St Paul Park and Newport would create negative impacts, since neither of the cities has planned for an interstate along the route that you propose.

L As the DEIS points out, the Preferred Corridor is the product of years of planning and has the approval of the MC and most of the cities in the project area. On the other hand, the route that you have designated "The Highway 55 Alternate" has not been proposed by any of the regional agencies or local cities. It does not appear in any of Mn DOT's public hearing records or records of meetings with the MC or local cities.

Although Mn DOT's files contains several references to a "TH 55 Alternate", there is no indication that the alternate was ever defined for Mn DOT prior to the August 25, 1977, public hearing. Since the hearing, the alternate was defined in the comments on the DEIS from Dayton, Herman, and Graham (p 152), and in your comments. Response E of the responses to Dayton, Herman, and Graham contains Mn DOT's evaluation of this alternate.

M See preceding Responses

N Response E to Dayton, Herman, and Graham (p 155) contains a table which compares the impacts on Alt A, Alt B, and your suggested southern route, TH 55. As the table indicated, a corridor along the southern route would impact about the same acreage of woodland and 29 acres more of wetland (including river and lakes).

O No additional comments have been received.

[2] The Federal Office of Management and Budget's Circular A-95 established the A-95 Clearinghouse Review. This review evaluates and coordinates highway projects, using as guidelines the objectives stated in Title IV of the Intergovernmental Cooperation Act of 1968: ". . .to maximum extent possible, consistent with national objectives, all Federal Aid for Development Purposes shall be consistent with and further the objectives of State, regional, and local planning." In the Minneapolis-St Paul Area, the Metropolitan Council makes the A-95 Review.

PACKER RIVER TERMINAL, INC.

1303 RED ROCK ROAD • P.O. BOX 3032 • ST. PAUL, MINNESOTA 55165

TELEPHONE:
ST. PAUL 612-735-5440

August 31, 1977

District Engineer
MnDOT, Div. of Highways - Dist. #9
3485 Hadley Ave. No.
Post Office Box 2050
North St. Paul, Minn. 55109

(and)

Division Administrator
Federal Highway Administration
Suite 490 - Metro Square Building
St. Paul, Minn. 55101

RE: DEIS and Prelim 4(f) Document
I-494 & S.P. 1985, 1986, 2785

Gentlemen:

Thank you for the opportunity to respond to the subject DEIS. This letter and comments are submitted for inclusion in the record with respect to the subject projects.

We are in the process of developing and constructing a multi-million-dollar river terminal to effectuate the intermodal exchange of bulk commodities. Our investments in South St. Paul were initiated in early 1974, with the goal of full facilities development by 1980.

I have reviewed the subject EIS in considerable detail, and am concerned that the improvements, suggested to serve the areas in South St. Paul (pages 18, 20, and 21,), have been given somewhat cursory consideration. This gives rise to the immediate fear that these revisions will not be accomplished in concert with the balance of the project and, preferably, immediately.

In this respect, I cite the following:

A
1. You have commented, on page 5, that the South St. Paul Stockyards generates more truck traffic than any other area in the State of Minnesota.
2. Figure 1-2, on page 7, does not appear to evaluate the "level of service" characteristics from the Mississippi River bridge through Concord Street (T.N.56). I have personally observed many occasions where truck traffic to the Stockyards has "backed-up" onto T.H.110. It would seem that the current level of service classification should be "E-Unstable, Some Possible Stopping" at best.

A
3. Table 1-1, on page 9, does not include accident rates at either Concord Street (T.H.56) or Farwell Avenue. The Concord Street interchange area, in particular, is extremely accident prone.

It would be an act of total irresponsibility to treat this segment of the system as lightly as appears in the DEIS.

The EIS also fails to note the potential impact of the proposed project (page 65), and the "no-build" alternative (page 103) on commercial and industrial development in South St. Paul. I can certainly speak to this quite clearly as relates to our terminal development. The proposed project, and its benefits to the overall transportation system in the region, was a major factor in the selection and development of our project on the Mississippi Riverfront, just south of the river bridge, in South St. Paul.

B
The "no build" alternative will result in extreme economic hardship, not only to our operations, but indirectly, to the consumers of this region. The economic importance of efficient terminaling facilities, as they relate to the price of consumer goods in this area, cannot be overlooked. The loss of jobs and tax base to the City of South St. Paul, is also a factor.

C
Our own development is poorly served by the present collector system feeding to T.H. 110, from areas of South St. Paul southerly of the existing facilities. All traffic is forced to Concord Street - a matter of concern to the City, and of grave concern to us. These problems would be almost totally eliminated if the industrial roadway "and related interchange reconstruction, at Farwell Avenue and Concord Street (Figure 2-1, page 21), were to be initiated at the earliest possible date - and certainly not later than the balance of the I-494 improvements. It seems almost more logical that these improvements should preceed the others.

I would hope that these comments do not act to over-ride the main point of this letter, which is to offer our total support of the proposed project, and your efforts to see to it that this most critical segment of roadway be finally upgraded.

Respectfully,

PACKER RIVER TERMINAL, INC.

Thomas J. McMahon, President.

TJM/dab

RESPONSE TO PACKER RIVER TERMINAL

A The level of service on the inplace section of I-494 through So St Paul (from the Mississippi River Bridge to Concord St) is C as Figure 1-2 on p 7 indicates. This analysis does not include the level of service on the ramps of the Concord St and I-494 interchange. Mn DOT is aware of conditions at this interchange, however, and has developed a design that should improve the traffic flow and safety on it. This reconstruction, along with the relocation of the Farwell Av interchange to the site of the Industrial Penetrator Rd, could possible start before the construction of proposed I-494. If not, it will be done at the same time as the proposed section of I-494 (see discussion on p 18).

The accident rate along the section of I-494 through So St Paul is 2.4 per million vehicular miles. This figure did not appear in Table 1-1 of the DEIS (p 9), but it did appear in the text on the page that followed (p 10), in the discussion on Inplace I-494 in So St Paul.

B Although the DEIS did not single out the impacts of the No-Build Alternate on industrial and commercial development in So St Paul, it did point out what not constructing the proposed section of I-494 would mean to existing and proposed industrial and commercial development in the overall project area.

C See Response A

Metropolitan Transit Commission
801 American Center Building St. Paul, Minnesota 55101 612/221 0939

September 13, 1977

Mr James Harrington
Commissioner
MInnesota Department of Transportation
Transportation Bldg
St Paul, MN 55155

FHWA-MN-EIS-77-03-D
DRAFT ENVIRONMENTAL IMPACT STATEMENT
I-494 IN HENNEPIN AND DAKOTA COUNTIES
SP 1985, 1986, and 2785

Dear Commissioner Harrington

You have already received Metropolitan Transit Commission comments on the proposed Interstate 494 from 24th Avenue in Bloomington to the Mississippi River bridge in South St Paul. As your department requested, those comments were rather narrowly confined to transit related matters. Therefore, the broader comments which follow come from me individually--not from the commission or its staff.

Generally, many citizens have pointed to such things as the environmental damage to the river valley. Similarly, one might protest that the claimed economic development will be primarily the result of I-35E completion rather than I-494. Moreover, I suggest that the promotion of urban sprawl in an era of projected petroleum shortages makes little sense.

Instead of discussing such matters however, and on the basis of MN/DOT's assumption that a permanent connective routing of I-494 in this general area is essential to the interstate system, I want to question the basic alignment of the roadway and its consequent expense. The construction cost alone of this interstate connection is nearly $55 million. I am therefore forwarding for your consideration the following propositions:

A

1. Continue the construction of the six lane TH 36 bridge and approaches to relieve today's pressure for river crossing to and from Dakota County;

2. Continue construction plans for the relocation of TH 13, eliminating the at-grade intersection conflict at the east end of the Mendota Bridge, thereby improving traffic flow on that bridge;

B

3. Abandon construction of I-494 from 24th Av in Bloomington to the point of its proposed interchange with I-35E, thus eliminating the very expensive structure spanning the broad Minnesota River valley;

4. Redesignate TH 5, the Mendota Bridge, and TH 110 as the routing for I-494. (For interstate purposes, this now serves as the I-494 connection.)

5. Upgrade the TH 110 expressway to interstate standards;

C

6. a) Under this alternative, continue construction of I-35E from the south through Dakota County to join the completed I-35E section at its present TH 110 terminus, or,

   b) Abandon the proposed I-35E segment from the point of the abandoned I-494 interchange northward to TH 110, and redesignate as I-35E the proposed I-494 segment stretching from the aforementioned interchange to the junction with the TH 3 freeway. Designate the latter freeway as the continuation of I-35E. (Under this alternative, other alignments may be practical to overcome the objections of Sunfish Lake residents.) This alternative is additionally attractive in view of your published comments that the controversial I-35E segment in St Paul is a "non-essential link in the interstate system."

The I-494 segment referred to in proposition 3 has estimated construction costs of between $25 and $30 million exclusive of the I-35E interchange. Moreover, this estimate does not include right-of-way, engineering, or administration.

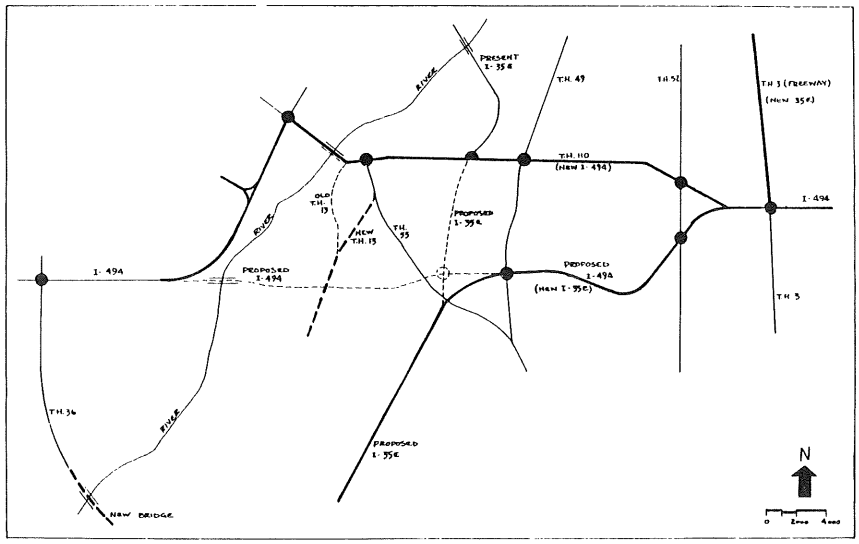
The I-35E segment referred to in proposition 6(b) has estimated construction costs well over $20 million (including the 35/494 interchange), and, again, this does not include right-of-way and engineering.

I request that this letter be made part of the comments on the subject draft EIS. I have attached a conceptual map exhibiting the propositions. I hope that you will direct your staff to give objective consideration to this alternative.

Sincerely

Doug Kelm
Chairman

kw



RESPONSE TO DOUG KELM

A Traffic projections indicate a need for an additional Minnesota River crossing in the project area. The Mendota Bridge will be operating at capacity even after a new interchange system is constructed for TH's 13, 55 and 110.

B Proposed I-494 is part of the region's development plans. The Metropolitan Council, the Council's Interstate Committee and Transportation Advisory Board, the County and the local governments have planned for the highway. These entities are planning on growth and development. The Metropolitan Development Guide encourages development in this area and will attempt to discourage development in areas of less planned urbanization (outside the metropolitan urban services area).

Most of whatever environmental impacts were to be produced by the construction of the proposed 494 river bridge have already occurred. A sand blanket has been constructed on the flood plain west of the Minnesota River channels and all of the excavation, fill and grading of I-494 east of the channels has also been completed. All that is left is the construction of the bridge structure.

The Department of Natural Resources has found the proposed I-494 bridge to be compatible with the surrounding land-use. The proposed highway is also planned for in the DNR's Fort Snelling State Park Management Plan.

C Your suggestions for upgrading TH 110 to a freeway or for routing 35E on TH 3 (Lafayette) is contrary to the MC's transportation plan for the region. Also, the communities adjacent to these roadways (Mendota Heights, West St Paul, Inver Grove Heights, and So St Paul) would more than likely oppose these suggestions (for example, see West St Paul's resolution, p 201).

Metropolitan Transit Commission
801 American Center Building St. Paul, Minnesota 55101 612/221-0939

September 13, 1977

Mr James Harrington
Commissioner
MInnesota Department of Transportation
Transportation Bldg
St Paul, MN 55155

FHWA-MN-EIS-77-03-D
DRAFT ENVIRONMENTAL IMPACT STATEMENT
I-494 IN HENNEPIN AND DAKOTA COUNTIES
SP 1985, 1986, and 2785

Dear Commissioner Harrington

You have already received Metropolitan Transit Commission comments on the proposed Interstate 494 from 24th Avenue in Bloomington to the Mississippi River bridge in South St Paul. As your department requested, those comments were rather narrowly confined to transit related matters. Therefore, the broader comments which follow come from me individually--not from the commission or its staff.

Generally, many citizens have pointed to such things as the environmental damage to the river valley. Similarly, one might protest that the claimed economic development will be primarily the result of I-35E completion rather than I-494. Moreover, I suggest that the promotion of urban sprawl in an era of projected petroleum shortages makes little sense.

Instead of discussing such matters however, and on the basis of MN/DOT's assumption that a permanent connective routing of I-494 in this general area is essential to the interstate system, I want to question the basic alignment of the roadway and its consequent expense. The construction cost alone of this interstate connection is nearly $55 million. I am therefore forwarding for your consideration the following propositions:

A

1. Continue the construction of the six lane TH 36 bridge and approaches to relieve today's pressure for river crossing to and from Dakota County;

2. Continue construction plans for the relocation of TH 13, eliminating the at-grade intersection conflict at the east end of the Mendota Bridge, thereby improving traffic flow on that bridge;

B

3. Abandon construction of I-494 from 24th Av in Bloomington to the point of its proposed interchange with I-35E, thus eliminating the very expensive structure spanning the broad Minnesota River valley;

4. Redesignate TH 5, the Mendota Bridge, and TH 110 as the routing for I-494. (For interstate purposes, this now serves as the I-494 connection.)

5. Upgrade the TH 110 expressway to interstate standards;

C

6. a) Under this alternative, continue construction of I-35E from the south through Dakota County to join the completed I-35E section at its present TH 110 terminus, or,

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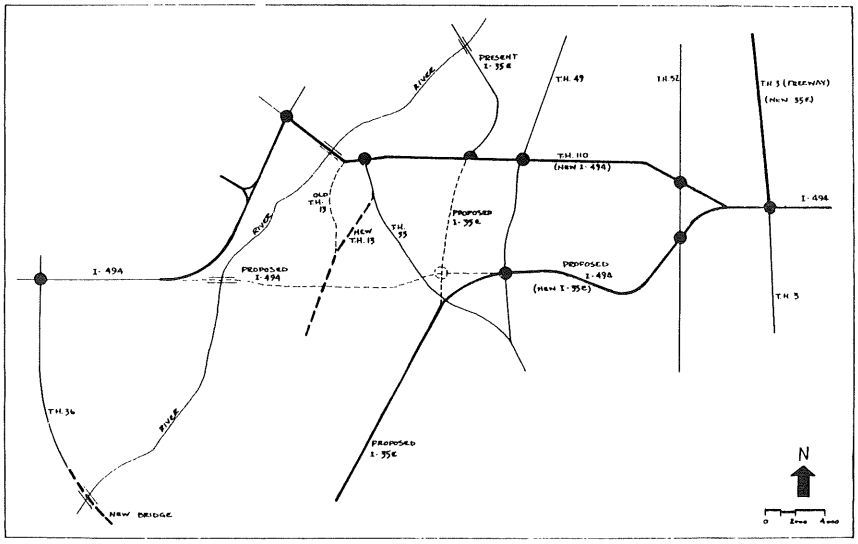
I request that this letter be made part of the comments on the subject draft EIS. I have attached a conceptual map exhibiting the propositions. I hope that you will direct your staff to give objective consideration to this alternative.

Sincerely

Doug Kelm
Chairman

kw



RESPONSE TO DOUG KELM

A Traffic projections indicate a need for an additional Minnesota River crossing in the project area. The Mendota Bridge will be operating at capacity even after a new interchange system is constructed for TH's 13, 55 and 110.

B Proposed I-494 is part of the region's development plans. The Metropolitan Council, the Council's Interstate Committee and Transportation Advisory Board, the County and the local governments have planned for the highway. These entities are planning on growth and development. The Metropolitan Development Guide encourages development in this area and will attempt to discourage development in areas of less planned urbanization (outside the metropolitan urban services area).

Most of whatever environmental impacts were to be produced by the construction of the proposed 494 river bridge have already occurred. A sand blanket has been constructed on the flood plain west of the Minnesota River channels and all of the excavation, fill and grading of I-494 east of the channels has also been completed. All that is left is the construction of the bridge structure.

The Department of Natural Resources has found the proposed I-494 bridge to be compatible with the surrounding land-use. The proposed highway is also planned for in the DNR's Fort Snelling State Park Management Plan.

C Your suggestions for upgrading TH 110 to a freeway or for routing 35E on TH 3 (Lafayette) is contrary to the MC's transportation plan for the region. Also, the communities adjacent to these roadways (Mendota Heights, West St Paul, Inver Grove Heights, and So St Paul) would more than likely oppose these suggestions (for example, see West St Paul's resolution, p 201).

Independent School District No. 197

BOARD OF EDUCATION
Chairman
Mr. Charles R. McDuff
Clerk
Mr. James C. Sherman
Treasurer
Mr. Robert L. Rhodes
Directors
Mr. Peter A. Nasvik
Mr. Robert D. Rufer
Mr. C. Watts Tower, Jr.

1037 Bidwell Street
WEST SAINT PAUL MINNESOTA 55118
(612) 457-1212
Dr Russell D Anderson Superintendent

September 26, 1977

DISTRICT ADMINISTRATION
Assistant Superintendent
Administration and Personnel
Mr. Stanley H. Gustafson
Assistant Superintendent
Mr. Thomas R. Kleppe
Director of Business Affairs
Dr. Donald G. Zahn
Director of Special Services
Mr. Frederick C. Quirk

District Engineer
Minnesota Department of Transportation
District Nine
3485 Hadley Avenue North
Box 2050
North Saint Paul, Mn. 55109

Dear Sir:

The School Board of Independent School District 197, West Saint Paul, has reviewed and discussed at two different meetings, the draft environmental impact statement for Interstate 494 as it affects our school district. In addition, the Board Chairman, Treasurer, Superintendent and Director of Special Services attended the public hearing held at Henry Sibley Senior High School on Thursday, August 25, 1977.

A It is the general opinion of our School Board that the completion of Interstate 494 should take place as soon as possible. There is concern that in determining the location of the highway corridor and interchanges, that the highest possible priority be given to the traffic flow and safety as it affects our students and district residents.

If there is any specific information that you do not already have from our staff on the busing patterns of our School District, we would be very happy to supply the information.

Sincerely,

Charles R. McDuff

Mr. Charles R. McDuff, Chairman
Independent School District 197 School Board

WE ARE A MEMBER OF AN EQUAL OPPORTUNITY COMMUNITY

RESPONSE TO INDEPENDENT SCHOOL DISTRICT NO. 197

A Thank you for your comments. Safety and traffic flow were prime considerations in the development of the proposed system of highways for the project area.

An analysis of proposed I-494's impact on your School District's busing patterns appears on p 117 of the FEIS.

PART C COMMENTS ON DEIS FROM AGENCIES AND LOCAL CITIES

UNITED STATES DEPARTMENT OF AGRICULTURE
FOREST SERVICE
NORTHEASTERN AREA, STATE AND PRIVATE FORESTRY
6816 MARKET STREET, UPPER DARBY, PA. 19082
(215) 596-1671

8430
September 9, 1977

Mr. Leonard Ellis
Design Engineer
Minnesota Department of Transportation
Transportation Building
St. Paul, Minnesota 55155

Refer to: 330; FHWA-Mn-EIS-77-03-D; I-494-4; Bloomington-South St. Paul

Dear Mr. Ellis:

A The section on Minimization of Harm refers to a conceptual landscape plan but describes the methods used only briefly. Landscaping can consist of replacing lost trees and also be an opportunity to increase the variety of views for drivers and residents. Small shrubs, small trees and large trees can form a progression of vegetation from the edge of a road inward, giving a rounded impression rather than a square one. Berries of different colors (viburnums, dogwoods, pyracantha, juniper) add color.

B Where salt has been applied to roadways and is leached to soil under growing plants, powdered gypsum has been used in some states to reduce salt content as much as 76 percent. Soil scientists at the University of Minnesota, and suppliers of gypsum can suggest formulations and application techniques that would reduce the effects of excess salt on grass and under trees.

Thank you for the opportunity to comment on this draft statement.

Sincerely,

for DALE O. VANDENBURG
Staff Director
Environmental Quality Evaluation

RESPONSE TO US DEPARTMENT OF AGRICULTURE

A The discussion on the Conceptual Landscape Plan was actually a brief summary of the material in a "Visual Analysis of Aesthetic Resources", a detailed sub-report which Mn DOT's Office of Enfironmental Affairs prepared for the I-494 study. Considerations like those you mentioned are discussed thoroughly in the report and will be implemented where appropriate during construction.

B We are aware of the research and experiments with powdered gypsum in other states. After considering its use in Minnesota, we have concluded it would have to be confined to relatively short stretches of highway where the need for high concentrations of salt or severe conditions would warrant its use. For this reason, we do not contemplate using gypsum as a substitute for salt, at least not at this time.

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
AREA OFFICE
6400 FRANCE AVENUE SOUTH
MINNEAPOLIS, MINNESOTA 55435

REGION V
300 South Wacker Drive
Chicago, Illinois 60606

March 3, 1978

IN REPLY REFER TO:
5.6CS:WM

Mr. Richard E. Luhrsen, Project Manager
Minnesota Department of Transportation
District 9
3485 Hadley Avenue North, Box #2050
North St. Paul, Minnesota 55109

Dear Mr. Luhrsen:

Subject: 319 S.P. 1985 1-494 Environmental Impact Statement;
4(f) and 6(f) Involvement, Fort Snelling State Park

This will serve to inform you that we have no substantive comments concerning the aforementioned project. Thank you for the opportunity to participate in the E.I.S. process.

Sincerely,

Thomas T. Feeney
Area Office Manager

UNITED STATES DEPARTMENT OF COMMERCE
The Assistant Secretary for Science and Technology
Washington, D.C. 20230
(202) 377-3111

September 14, 1977

Mr. Leonard G. Eilts
Design Engineer
Minnesota Department of Transportation
Transportation Building
St. Paul, Minnesota 55155

Dear Mr. Eilts:

This is in reference to your draft environmental impact statement entitled, "Interstate 494 From 24th Avenue in Bloomington to the Mississippi River Bridge in South St. Paul, Minneapolis." The enclosed comments from the National Oceanic and Atmospheric Administration are forwarded for your consideration.

Thank you for giving us an opportunity to provide these comments, which we hope will be of assistance to you. We would appreciate receiving three (3) copies of the final statement.

Sincerely,

Sidney R. Galler
Deputy Assistant Secretary
for Environmental Affairs

Enclosure - Memo from National Ocean Survey,
August 4, 1977

U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
Rockville, Md. 20852

Date: August 4, 1977

Reply to Attn of:

Subject: DEIS 7708.04 - Interstate 494 From 24th Avenue in Bloomington to the Mississippi River Bridge in South St. Paul, Minneapolis

To: Director, Office of Ecology and Environmental Conservation, NOAA

The National Geodetic Survey does not have any comments on subject draft environmental impact statement, other than the possible impact on monuments of the National Geodetic Control Networks.

Bench marks, triangulation stations, and traverse stations have been established by the National Geodetic Survey in the vicinity of the proposed project. Construction required for the project could result in destruction or damage to some of these monuments. A

The National Geodetic Survey requires sufficient advance notification of impending disturbance or destruction of monuments so that plans can be made for their relocation. The National Geodetic Survey recommends that provision be made in the project funding to cover costs of monument relocation.

Gordon Lill
Deputy Director
National Ocean Survey

RESPONSE TO US DEPARTMENT OF COMMERCE

A Careful attention will be given to monuments during construction, and they will be relocated as you have suggested.

United States Department of the Interior

OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20240

ER-77/738

Dear Mr. Carlson:

This is in response to the request for the Department of the Interior's comments relative to the draft environmental/Section 4(f) statement for I-494, Hennepin and Dakota Counties, Minnesota.

General Comments

The document is generally adequate with regard to its description of resources of concern to this Department and the probable impacts of the proposed project on those resources. The graphics materially aided our review. While it is indicated that considerable coordination has taken place with Federal and State resource agencies, little evidence of this coordination is included in the document. Considering the substantial extent of natural resource involvement in the project and, more specifically, the content of the last sentence in the first paragraph on page 132, we believe that the final statement should include direct evidence of coordination with Federal and State natural resource agencies.

A

Section 4(f) Comments

There appears to be no feasible and prudent alternative to the proposed conversion of 20 to 30 acres of Fort Snelling State Park into a settling pond and associated drainage facilities. However, because of the preliminary nature of the Section 4(f) document and lack of basic information, we cannot yet concur that all possible planning has been considered to mitigate harm to the Section 4(f) lands.

B

Even in this large park we view the difference between 20 acres and 30 acres as substantial. We urge that all means be investigated, including the enlargement of other planned settling ponds in the drainage system, development of additional off-park sites, and maximizing the depths of all sedimentation ponds, in order to minimize the Section 4(f) acreage involved.

C

It is indicated that in addition to serving as part of the drainage plan for proposed I-494, the settling pond will also be available to collect drainage from the proposed Minnesota Department of Natural Resources trail center and parking lot to be constructed nearby in the park. However, there is no evidence presented as to the specific need for such a drainage facility to serve the trail center. The outflow from the pond will drain into and through Gun Club Lake to the Minnesota River. The structural design of the outflow channel should be coordinated with the Minnesota Pollution Control Agency for assurance that the effluent meets the State water quality standards.

D

In addition to the Section 4(f) conflict, the involved parklands are also subject to the provisions of Section 6(f) of the Land and Water Conservation Fund Act (LAWCON), the park having received financial assistance for both acquisition and development (Projects #27 - 00253, 27 - 00317, 27 - 00404, 27 - 00542, 27 - 00711, and 27 - 00748). The statement indicates that the Minnesota Division of Highways and Department of Natural Resources are in the process of negotiating replacement lands for the Section 6(f) lands which would be taken for the project.

Environmental Statement Comments

E

On page 85, it is indicated that over 40 acres of wetlands may be impacted by construction via filling or drainage. These wetlands (Types 1 through 7, U.S. Fish and Wildlife Circular 39) perform needed hydrologic functions and provide habitat for waterfowl and fur-bearing mammals. Because the project will result in the diminution of the quantity and/or quality of these highly productive areas, we urge that comparable wetland areas be acquired. If this proves infeasible, the possibility of improving lower quality wetland basins (Types 1, 2, or 6, U.S. Fish and Wildlife Circular 39) left in the right-of-way to more productive wetlands (Type 3, 4, or 5, U.S. Fish and Wildlife Circular 39) should be investigated. These "improvable" wetlands are identified on page 91 of the statement. The construction of ponding areas or landscaping of borrow pits for use by waterfowl should also be implemented.

On page 87 it is indicated that some work on I-494 has been done in the Minnesota River Valley floodplain prior to the requirement for an environmental statement. Even though some excavation and filling has been accomplished to establish the roadway embankment, the river valley remains as the largest contiguous block of relatively undisturbed wildlife habitat along the highway right-of-way. Several measures should be

F

taken to preserve the floodplain habitat such as: (1) allowing snag trees to be left in the right-of-way to provide cover, nesting holes, and perches for wood ducks and other wildlife; (2) making brush piles from trees and shrubs cleared during construction and placing them in the right-of-way of the river bottom to provide cover for wildlife; and (3) keeping the roadside vegetation in the valley in a natural, unmanaged condition to blend in with the vegetation of the State park.

There is a discussion on page 97 of the impacts of the proposed construction on Schmidt Lake, a 62.9-acre lake that would be reduced by 4.75 acres as a result of I-494 construction. Impacts of added fill on the storage capacity, aquatic vegetation, and water quality are discussed in the statement. The northern end of Schmidt Lake is the only segment of the lake that remains well vegetated with bur, white and red oak, American elm, and boxelder. Construction through this segment of the lake would remove a large percentage of this mature woodland and substantially lower the area's high aesthetic value. Construction designed to avoid encroachment into this lake and its associated vegetation is recommended.

G

The U.S. Fish and Wildlife Service reviews Section 404 permit applications made to the U.S. Corps of Engineers for the discharge of fill material into navigable waters and associated wetlands. Prior to our approval of the proposed activity, the applicant must show that the proposed work will not cause avoidable adverse environmental impacts with respect to the degradation of natural resources. Therefore, all efforts to minimize negative impacts of this project should be a part of the final I-494 construction plan.

Summary Comments

Because of a lack of information relative to size of the settling pond, the potential for minimizing its size through greater reliance on planned and/or potential upstream settling ponds, and a specific proposal relative to the replacement of Section 6(f) lands, we cannot concur at this time with Section 4(f) approval of the subject project. In order to facilitate concurrence of the final Section 4(f) statement, we suggest the Section 6(f) replacement land proposal be closely

H

H

coordinated with the Minnesota Department of Natural Resources and the Bureau of Outdoor Recreation regional office, Federal Building, Ann Arbor, Michigan 48107.

Sincerely yours,

Larry E. Meierotto
Secretary of the Interior

Deputy Assistant

Mr. E. Dean Carlson
Division Administrator
Federal Highway Administration
Suite 490, Metro Square Building
St. Paul, Minnesota 55101

RESPONSE TO US DEPARTMENT OF INTERIOR

A Letters showing coordination with the appropriate agencies have been included in the revisions for the FEIS. These appear on pages 138 and B8.

B The pond size indicated in the DEIS was based on a conceptual design which primarily used existing ground contours to obtain the required volume. After further study, we've determined that an 18-acre pond will provide adequate ponding volume. This smaller pond will have to be deeper than a larger one would, however.

Other planned settling ponds are located too far from the proposed drainage system outlet to provide any reduction in the volume of the pond at the outlet. The pond at the outlet will serve portions of Mendota Heights and Eagan industrial areas as well as portions of I-494 and TH 13. Outside the park, nearby, the hilly terrain wouldn't permit the development of an adequate size pond. Aside from being difficult to construct, a pond in this area couldn't serve the desired function. (See 4(f)Statement,Figures 5 and6, p 226)

C The DNR no longer plans to locate the trail center at the site indicated in the DEIS. Their new location is about 2.5 miles south.

Mn DOT has coordinated with MPCA on the type or outflow that will be used at the outlet from the sedimentation pond. See the revised discussion on p 108 of the FEIS.

D Mn DOT has coordinated the 6(f) replacement proposal with the Minnesota Department of Natural Resources (DNR) and the Heritage, Conservation, and Recreation Service (HCRS). A reference to this coordination and a discussion on the replacement land agreement appears on p 230 of the Section 4(f) Statement accompanying this EIS. Also included in the 4(f) Statement are letters from the DNR and HCRS (pages 232 and 233) that indicate coordination on the agreement.

E See B of Response to EPA (p 178) for Mn DOT's policy on replacing wetlands. Also see revised discussion in FEIS, p 99 , for a listing of the proposed mitigation measures.

Since the circulation of the DEIS, Mn DOT has had additional coordination with the US Fish and Wildlife Service and the Minnesota DNR on the wetland and vegetation impacts and the proposed mitigation measures. Both agencies indicate that the proposed mitigation measures are acceptable to them. (See letters on p 137 and 138 of Section X, Coordination).

Generally, borrow pit sites are leased by the contractor and are rarely under Mn DOT's ownership. The contractor has the option of using whatever sites he chooses, the only Mn DOT imposed requirements being that, in hauling from the site, he conforms to State and local regulations and that he leaves the site restored. The restoration includes cleaning, shaping, and reestablishing topsoil and vegetative covers. It does not include creating ponding areas at the site, however.

F Snag trees and brush piles will be left within the highway R/W in the floodplain after construction. Trees and brush piles will probably be restricted to areas adjacent to the river bridge. Also, where its practical and consistent with safety and maintenance standards, the roadside vegetation will be left in a natural, unmanaged condition or planted with a prairie grass. These mitigation measures will be coordinated closely with the Mn DNR.

G Because of design restraints, existing transportation corridors, and surrounding land uses, an additional shift in the alignment of proposed I-494 to miss Schmidt Lake is not possible. As noted on page 50 of the DEIS, the preferred corridor already indicates a shift in alignment from those previously considered in order to reduce the encroachment on Schmidt Lake.

I G L As pages 99 and 101 of the DEIS indicated, the contractor will be required to incorporate erosion control measures during the construction to minimize harm to the lake. In addition, Mn DOT will landscape the embankment nearest the lake (DEIS, p 98, paragraph 7). Both the erosion control measures and landscaping will be coordinated with the DNR.

H See Response D

DEPARTMENT OF TRANSPORTATION
UNITED STATES COAST GUARD

MAILING ADDRESS
(obx)

Tel. 314-425-4607
FTS 279-4607

16590
16 September 1977

Mr. Leonard G. Eilts
Design Engineer
Minnesota Department of Transportation
Transportation Building
St. Paul, Minnesota 55155

Re: 330 FHWA-MN-EIS-77-03-D Draft Environmental Impact Statement for Interstate Highway 494 in Hennepin and Dakota Counties, Minnesota Project I-494-4( ) State Project 1985, 1986 and 2785 From: 24th Avenue in the City of Bloomington, To: Mississippi River Bridge in the City of South St. Paul

Dear Mr. Eilts:

This is in reply to your letter of 25 July 1977 forwarding a copy of the Draft Environmental Statement for the referenced project.

We have no comment to add to the comments contained in our letter of 23 May 1977 on Page 117 of the referenced statement.

Sincerely,

GLENN F. YOUNG
Captain, U. S. Coast Guard
Chief, Operations Division
By direction of the District Commander

DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION

GREAT LAKES REGION
2300 EAST DEVON AVENUE
DES PLAINES, ILLINOIS 60018

SEP 8 1977

Mr. Leonard G. Eilts
Design Engineer
Minnesota Department of Transportation
Transportation Building
St. Paul, Minnesota 55155

RE: 330 FHWA-MN-EIS-77-03-D

Dear Mr. Eilts:

We have reviewed the Draft Environmental Impact Statement for Interstate Highway 494. While we do not have any environmentally related comments to offer, we would request that further coordination be accomplished with our Airports District Office in Minneapolis on the following two areas:

1. The reconstruction of existing TH5 from I 494 to Post Road.

A

2. The reconstructed interchange located at I 494 and Pilot Knob Road as depicted on Figure 2-1.

We are specifically interested in the heights of all light standards that are either added or relocated, as well as construction equipment in these two areas. This coordination should be accomplished through the filing of FAA Form 7460-1.

Sincerely,

KENNETH A. KRAUS
Environmental Officer, AGL-4.5

RESPONSE TO FEDERAL AVIATION ADMINISTRATION

A Mn DOT will coordinate the use of construction equipment and the lighting plans for the reconstruction of TH 5 and the Pilot Knob Interchange with the Airport's District Office as you have recommended.

FEDERAL POWER COMMISSION
REGIONAL OFFICE
Federal Building, Room 3130
230 South Dearborn Street
Chicago, Illinois 60604

August 10, 1977

Mr. Leonard G. Eilts
Design Engineer
Minnesota Department of Transportation
Transportation Building
St. Paul, Minnesota 55155

Dear Mr. Eilts:

Your Reference: 330 FHWA-Mn-EIS-77-03-D

We have reviewed the Draft Environmental Impact Statement dated June 30, 1977 for Interstate 494 from 24th Avenue in Bloomington to the Mississippi River Bridge in south St. Paul, furnished us with a letter dated July 25, 1977. Our comments are requested.

Comments of this office are made in accordance with the National Environmental Policy Act of 1969 and the August 1, 1973 Guidelines of the Council on Environmental Quality. Our principal concern with developments affecting land and water resources is the possible effect of such developments on bulk electric power facilities including potential hydroelectric developments and on natural gas pipeline facilities.

Since the above noted proposed project apparently would pose no major obstacle to the construction and operation of such facilities, we have no comments on the Draft EIS, and therefore do not request a copy of the final statement.

The foregoing statements are of this office and, therefore, do not necessarily represent the views of the Federal Power Commission.

Thank you for the opportunity to comment on the Draft Environmental Statement.

Very truly yours,

Bernard D. Murphy
Regional Engineer

Herbert R. Rinder
(Acting)

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST
CHICAGO, ILLINOIS 60604

Mr. Leonard G. Eilts
Design Engineer
Minnesota Department of Transportation
Transportation Building
St. Paul, Minnesota 55155

RE: 77-057-424
D-FHW-F40098-MN

Dear Mr. Eilts:

We have completed our review of the Draft Environmental Impact Statement (EIS) for Interstate 494, from 24th Avenue in Bloomington to the Mississippi River Bridge in South St. Paul, Minnesota. Your letter of July 25, 1977, requested our review and comments on the proposed interstate highway. As indicated in the Draft EIS, we have previously commented on the Air Quality and Noise Analysis Reports for this project. We have no objections to the project based upon the air and noise impacts. However, we do have concern about the loss of wetlands and water quality impacts of the project. The following are our Agency's comments on this proposal.

Our concern in regard to wetland impacts is based upon our Wetlands Policy and Executive Order 11990 of May 24, 1977. As written in the Draft EIS, you are also aware of the value and functions of wetland areas. However, as a result of the project between 40 and 60 acres of wetlands will be lost. While the acreage of wetlands impacted is not great when compared to the total acreage within the State of Minnesota, we find the loss of any wetlands significant. The EIS has indicated that some of the wetlands to be taken are prime habitat areas, the remainder are classed as good areas. Since our Agency and other agencies place a significant value on wetland areas, they should be avoided to the greatest extent possible.

A

We realize in some instances (Schmidt Lake in particular), the avoidance of fill operations may be impossible. To offset this loss of wetland areas, we suggest additional wetland habitat be created. The created habitat should be from lands not already classified as wetlands but sufficiently near other wetland areas to be beneficial to wildlife habitat. These created wetlands will also be beneficial to ground water recharge and flood control.

B

The EIS has indicated Schmidt Lake does not have appreciable flooding at the present time. This flood characteristic may change as a result of the 5.85 acre fill and future development in adjacent areas. While an overflow basin will be provided, the Final EIS should assess whether or not the increase in runoff can be absorbed by the overflow basin.

C

Sediment pond 1 appears to be within the flood plain or backwater area of the Minnesota River. The potential for the pond being flooded and having the contaminants enter the Minnesota River should be addressed in the Final EIS. Additional information on the sedimentation ponds should be provided including the frequency of sediment removal, whether or not oil skimmers will be provided, and the detention time of discharges.

D

We have previously commented on the noise impacts of the project. However, 24 residences will receive adverse noise impacts. It appears that noise mitigative measures are not possible at these sites. Since land purchases can be cost shared, consideration should be given to the purchase of these homes.

E

The EIS has indicated that traffic movement will be improved when I-35E is added to the system. Since completion of I-35E appears to involve considerable impacts within the urbanized area of St. Paul its structure may be delayed. It should not be concluded that I-35E will be completed as now planned and the affects on traffic movement assessed accordingly.

F

Based upon the wetland impacts of the project, we have rated the project as ER (environmental reservations). The Draft EIS has been classified as 2 (additional information necessary). The date and classification of our comments will be published in the Federal Register in accordance with our responsibility to inform the public of our views on other agencies' projects.

We appreciate the opportunity to review this Draft EIS. When the Final is filed with the Council on Environmental Quality, please forward 2 copies to us. If you or your staff has any questions in regard to our comments, please contact Mr. William D. Franz at 312-353-2307.

Sincerely yours,

Ronald L. Mustard

Ronald L. Mustard
Acting Chief,
Environmental Review Section

RESPONSE TO ENVIRONMENTAL PROTECTION AGENCY

A The corridor for proposed I-494 is located in a glacial terminal moraine which essentially covers all of the north and northwestern Dakota County. The terrain consists of extensive knob and kettle topography. Wetlands, ponds and small lakes exist in virtually every depression. Location of I-494 to avoid all wetlands is impossible within the context of design constraints and present and proposed municipal development along the corridor. The proposed alignment strikes a balance between these factors, and, in this way, minimizes our wetland impact. (See revised discussion on Wetlands, p 92 to 104).

B Mn DOT's replacement-land policy is restricted to acquisition of lands to replace publicly-owned lands required for highway purposes as specified in Minnesota Statute N. 161.202. The only publicly owned wetlands along the I-494 corridor are located in Fort Snelling State Park. Proposed I-494 will require some land from the park for a proposed ponding area. Discussions with the Minnesota Department of Natural Resources and the Heritage Conservation and Recreation Service have determined that this pond will constitute a 6(f) involvement and will require replacement land. (See discussion on p 64 and in the accompanying 4(f) Statement, p 230).

About nine acres of wetlands adjacent to the I-494 corridor will be used as receptors for highway runoff. These will be acquired and modified or improved as necessary to provide adequate storage capacity. Some of these wetlands are also designated flood retention sites in municipal storm drainage plans and will therefore be preserved in future development plans. Also, up to 12 acres of new wetlands will be created in the upland areas. (See the revised discussion on Wetland Impacts, Minimization of Harm, p 99).

C No overflow basin is proposed at Schmidt Lake. Schmidt Lake has a natural outlet which currently regulates the water level. Further, Schmidt Lake is designated as a significant storm water retention basin in the Inver Grove Heights municipal drainage plan. The system originates in West St Paul and primarily follows the I-494 corridor to the Mississippi River. Considerable ponding is proposed in this system to reduce peak runoff. Mn DOT plans to construct a sizeable pond upstream of Schmidt Lake (part of the Drainage Plan for I-494) to reduce peak flows into the lake to quantities which can adequately be accommodated by available storage capacity in the basin and by its outlet.

C Preliminary computations indicate that loss of existing storage capacity because of the highway fill will not appreciably affect flood levels on Schmidt Lake.

Pond No. 1 will be located on I-494 R/W in the flood-plain under the Minnesota River bridge. The maximum dike height will be approximately at an elevation of 706.0 feet. It will be over-topped by a 10-year frequency discharge on the Minnesota River. It will have no appreciable effect on the 100-year frequency flood stage or bridge backwater at this site.

D Generally our permanent sediment ponds are designed with sufficient storage capacity to limit required clean out during construction to twice a year. A standing pool is usually maintained to provide this storage, reduce emergent vegetation, and enhance its wildlife value. The outlet structure is designed to maintain this pool, provide periodic drawdown for maintenance and provide passive skimming of floatibles. These ponds are designed primarily for the routine precipitation events and storage capacity is limited to the 5-year frequency, 24 hour runoff event. Greater amounts of runoff overflows the ponds in spillways provided for that purpose. Retention time varies and depends on the size of the runoff-events being longer for larger events up to overflow.

E Property acquisition as an ordinary noise abatement measure isn't within the scope of the Federal Highway Administration's regulations (FHPM-7-7-3). If the noise impact is especially severe and conventional abatement measures are unacceptable, this extraordinary measure could be considered on a case by case basis. FHPM 7-7-3 does not define especially severe impacts. This determination must be made by Mn DOT. Any proposal of extraordinary abatement measures must be approved by the regional Federal Highway Administration. With the I-494 proposal, however, the noise analysis indicates that the impacts on those residences where noise abatement is not feasible will not be severe enough to warrant property acquisitions (see Table 6-8, Noise Impact, p 85).

F See A of Responses to Inver Grove Heights (p 199).

MINNESOTA ENERGY AGENCY
720 AMERICAN CENTER BUILDING
150 EAST KELLOGG BOULEVARD
ST. PAUL, MINNESOTA 55101
612-296-5120

September 15, 1977

Mr. Leonard G. Eilts
Design Engineer
Minnesota Department of
Transportation
Room 604, State Transportation Bldg.
St. Paul, MN 55155

Dear Mr. Eilts:

The Energy Agency has reviewed the draft EIS on Interstate Highway 494 in Hennepin and Dakota Counties. The document is clear and very well written.

A The EIS states that transit plans for the project area include express bus service. Will preferential treatment for bus traffic be considered in the design process, as suggested by the Metropolitan Transit Commission?

B The document treats the relationship of the project to induced growth in the project area, which lies entirely within the Metropolitan Urban Service Area. To what extent may completion of the project encourage outward sprawl beyond the project area?

Thank you for the opportunity to comment.

Sincerely,

Karen Cole
Environmental Coordinator

KC/djg

AN EQUAL OPPORTUNITY EMPLOYER

RESPONSE TO MINNESOTA ENERGY AGENCY

A In their response to the DEIS, the Metropolitan Transit Commission (MTC) stated the following:

> ". . . Buses operating in mixed traffic, with provisions, as necessary, for preferential treatment at points of access and egress is adequate on I-494."

Preferential treatment for bus traffic will be considered in the design process, in accordance with MTC's suggestion. Mn DOT will coordinate with the MTC during the design of the project to determine the type of preferential treatment that will be used on I-494.

B It should not encourage urban sprawl at all. The MC controls growth in the region through its Development Framework Guide (DFG). The I-494 project is part of the urban service area, the area in which the MC is encouraging growth. According to the DFG, the MC will use the tools at its disposal to limit growth in areas outside the urban service area.

STATE OF MINNESOTA

ENVIRONMENTAL QUALITY COUNCIL
CAPITOL SQUARE BUILDING
550 CEDAR STREET
ST. PAUL, 55101

September 21, 1977

Mr. Leonard G. Eilts
Design Engineer
MN/DOT
Room 604, State Transportation Building
St. Paul, MN 55155

Re: EQB Critical Areas Staff Review of the Draft Environmental Impact Statement for Interstate 494 in Hennepin and Dakota Counties

Dear Sir:

The Critical Area Staff has reviewed the DEIS for I-494 from Bloomington to South St. Paul for consistency with the Governors Executive Order Designating the Mississippi River Corridor Critical Area. This project lies within this Critical Area at both the Minnesota River Crossing and within South St. Paul. It is the conclusion of the staff that the project is in conformance with the standards and intent of the critical area designation.

The staff has two minor recommendations for changes to the DEIS.

A

1. The summary sheet page vii, number (10), indicates the Minnesota River Corridor Critical Area. This should be changed to read, Mississippi River Corridor Critical Area.

2. The sentence on page 39 indicating that the Minnesota Legislature designated the Critical Area, should be changed to read, the Governor through executive order.

The staff has several additional comments which pertain to further study or design of this section of I-494, but do not necessitate changes in the DEIS.

B

1. MN/DOT should give consideration to roadway and bridge designs which provide for uninterrupted views of the river and river valley for motorists. This issue is raised because numerous existing bridge railing designs block views of amenity areas.

C

2. The Department should obtain necessary local government grading and filling permits as required by the Interim Development Regulations.

3. In developing final engineering plans for this project, specific consideration should be given to the guidelines for construction of transportation facilities within the Interim Development Regulations.

Thank you for this opportunity to comment on this proposed project within the Mississippi River Corridor Critical Area.

Sincerely,

Clifton J. Aichinger
Critical Areas Coordinator

CJA/bjc

RESPONSE TO ENVIRONMENTAL QUALITY COUNCIL

A These corrections have been made in the FEIS.

B A roadway that provides aesthetically pleasing views to motorists is one of the primary concerns of Mn DOT's Office of Environmental Affairs. The consideration you have mentioned will be a feature of our river bridge, to the extent that safety and economic concerns will allow.

C Mn DOT will give consideration to the guidelines for constructing transportation facilities within the Interim Development Regulations. Mn DOT will obtain and comply with all necessary permits.

STATE OF
MINNESOTA
DEPARTMENT OF NATURAL RESOURCES
CENTENNIAL OFFICE BUILDING · ST. PAUL, MINNESOTA · 55155

October 3, 1977

DNR INFORMATION
(612) 296-6157

Leonard G. Eilts, Design Engineer
Mn/DOT
Transportation Building
St. Paul, Minnesota 55155

Re: 330-DEIS for I-494
in Hennepin and Dakota
Counties S.P. 1985, 1986
& 2785

Dear Mr. Eilts:

The Department of Natural Resources has reviewed the above cited document and offers the following comments.

The document states that a DNR Water Resource Permit has been granted in 1972 to cross Schmidt Lake. However this permit has expired in March of 1977 and a new permit will be needed. DNR has always had serious concerns about the "preferred" route because of the Schmidt Lake crossing, and the impact on numerous wetlands. The previous permit carried several requirements of which one, deepening Schmidt Lake by dredging has since then proven to be technically not feasible. Therefore the new permit will contain new mitigation requirements.

A

Furthermore, water resource permits will be required on several crossings of Type III, IV, V, and VI wetlands. Mitigation including erosion control plans must be developed for evaluation at the time of permit application.

B

While alternate A is the least detrimental route in terms of impacts on natural resources and more economical in terms of land acquisition we recognize that highway safety, transportation needs, together with existing land use and comprehensive plans of most surrounding communities would be substantially affected. However, the impacts on natural resources, must not be ignored. For this reason, the new permits for crossing Schmidt Lake and other wetlands on the preferred route will contain conditions requiring replacement in kind or improvement of Type III, IV, V, VI wetlands. The Minnesota Environmental Policy Act (Minn. St. 116D. 04, Subd. 6) supports this position, stating in part:

C

> "No..... permit for natural resources management (shall) be granted where such..... permit has caused or is likely to cause pollution, impairment, or destruction of the air, water, land or other natural resources located within the state so long as there is a feasible and prudent alternative consistent with the reasonable requirements of the public health, safety, and welfare..... economic considerations alone shall not justify such conduct."

AN EQUAL OPPORTUNITY EMPLOYER

D

The courts have supported this legislation. On November 19th 1976 the Minnesota Supreme Court ruled in favor of DNR's denial of a permit on the basis of the above mentioned act regarding a road construction project in the City of White Bear Lake, where feasible alternatives existed for the preferred route, which encroached upon a wetland portion of Birch Lake.

Our Department has in the past expressed preference towards upgrading existing facilities, as for example our position on I-94 in Washington County and TH 10 in Blaine.

E

Further mitigation as discussed in the Vegetation, Land Use, Wildlife Assessment on pages 30-35 should be implemented to the fullest extent. We strongly recommend establishment of prairie vegetation to landscape those portions of the right of way which would otherwise be seeded to a mixture of perennial grasses. Prairie vegetation consists of herbaceous flora and grasses which provide a dense sod and offer numerous benefits such as visual attraction, a diversity of food and nesting cover for wildlife, perennial self-maintenance and erosion control. Since prairie seed mixtures are locally available, we feel it would be an innovative approach to relieve monotonous right of way.

F

If the permit conditions outlined above for wetland replacement and other mitigation measures cannot be met, selection of Alternate A will be necessary. Justification for the preferred corridor, as opposed to Alternate A, should not be solely based upon the need for increased development as the DEIS repeatedly stresses. Indeed such justification has questionable validity under MEPA.

We recognize that development will occur, although we do not advocate or promote the high rate of development indicated in DEIS Table 6-1. Our agency is on record for discouraging the type of development that destroys natural resources in the interests of promulgating urban sprawl into semi-rural areas.

The development of a major freeway in a new corridor can "be a cause of urban sprawl" (p. 68). Historically this has proven to be true, and should not be encouraged. The DEIS stresses economic and social issues and impacts but down-plays or ignores issues and impacts in terms of fish and wildlife resources. These issues should receive equal consideration in light of increasing public interest and concerns.

G

The DEIS indicates, and we concur, that impact on wetlands and other natural resources of northern Dakota County will be significant. Therefore, the final EIS should identify all wetlands within the corridor in regard to location, site type and wildlife habitat value.

H

The document states on page 88, bottom paragraph, that one of the main causes of impact on the Minnesota River will be "the large quantity of runoff that will eventually reach the river." The discussion at this point should quantify how much runoff, as a result of the proposed project, will actually flow into the river, including a discussion on the significance of this impact on the receiving waters.

I

On page 90 you state "Table 6-10 gives the analysis of chloride concentrations entering the lakes." We believe the values given in the table actually represent the salt concentrations of the lakes rather than the runoff into them.

J

The discussion of salt and chloride concentrations in the area lakes after construction and the potential impacts on aquatic plants is incomplete. How much will these concentrations increase as a result of the project?

K

On page 99, the document states that "the plant and algae life have adjusted to the pollutants in highway runoff." Additional salt loading will cause additional adverse effects and already existing pollution does not justify the conclusion that the additional impact of runoff will be minimal.

L

Several other lakes in addition to Schmidt Lake are located in or along the project corridor, such, as Gun Club, Lemay, Rogers, Hornbeam and Horseshoe Lake. The document does not address the potential impact on water quantity and quality related to runoff into these lakes, or if previous degradation from existing highway runoff has occurred. Additional information addressing these concerns should be included.

We will work closely with DOT to mitigate project impacts to the maximum possible.

Sincerely,

Barbara B. Clark

Barbara B. Clark
Assistant Commissioner
Bureau of Planning

BBC:aa:dh

RESPONSE TO DEPARTMENT OF NATURAL RESOURCES

A As in the past, Mn DOT will work with DNR's Regional Hydrologist (and other personnel) to formulate mitigation measures where wetlands are involved, including erosion control measures. Mn DOT will obtain and comply with all necessary permits.

B Although adopting A as the Build-alternate would provide mobility for traffic passing through the area and would mean less of an impact on undeveloped lands and wetlands, it would not be in the best interest of the public safety and welfare of the cities of Eagan, Mendota Heights, Mendota, and West St Paul. Transportation, safety, and traffic congestion problems would remain unsolved for most of these cities (in Eagan and Mendota Heights they would probably be compounded). An off-shoot of these problems would be unnecessary gasoline consumption and possible increases in noise and air pollution, depending on the extent of development.

Also, as the DEIS indicated, Alternate A wouldn't be consistent with the MC's Functional Classification Plan (FCP), the transportation plan for the region. Formulated in cooperation with municipal and county governments in the region, the FCP is an important element of the MC's Development Framework Guide (DFG). Extensive studies, including ecological and resource considerations, were made as bases for the transportation plan as well as for other elements of the DFG. The FCP places the proposed section of highway in the Preferred Corridor.

C Under current Minnesota Law (Minnesota Statute N. 161.202), Mn DOT can only replace land that it takes from publicly-owned land for highway purposes. The only place this occurs is in Fort Snelling State Park for the proposed sedimentation pond. Consequently, except for the ponding area, we will not be able to buy land not contiguous to the highway R/W as replacement lands for wetlands impacted. Wherever possible, Mn DOT will purchase wetland contiguous to the highway R/W if we can include it in our design as part of the drainage plan or for esthetic purposes. (See expanded discussion on wetlands impacts and mitigation measures, p 92 through 104).

D See B

Our discussion on Alternatives to Miss Wetlands (p 99) and Figure 6-6 (p 95), part of the revised wetland discussion, indicate why a shift in the alignment to avoid wetlands is not practicable. A shift to either the north or south would require substantially more wetlands.

Mn DOT held a meeting with the US Corps of Engineers, the US Fish and Wildlife Service (USFWS), and representatives from your office on 10 May 1978 in which proposed I-494's impact on wetlands and the proposed mitigation measures were discussed. Letters from the USFWS and DNR, written in response to this meeting and indicating agreement with the mitigation measures we propose, appear in the Coordination Section on pages 137 and 138.

E The Mitigation Measures listed on page 99 will be implemented to the fullest extent possible.

Consideration will be given to using prairie grass in the landscape plan, where safety and maintenance standards will allow.

F One of the basic purposes of the DFG is to guide development in the Metropolitan Region. Guided, planned growth prevents random, undesirable growth, or what is commonly referred to as "urban sprawl".

Constructing a major roadway in an area where growth is not desired and where it has not been planned for can be a cause of urban sprawl. In this instance, however, major highways (I-494, I-35E, and TH 3) are part of the planned development, metropolitan and local planners having determined that improved transportation routes are essential for the project area.

G These wetlands are identified on pages 95 and 97 of the FEIS.

H Although we could probably estimate the amount of highway runoff, we know of no nationally-accepted method of predicting the amounts of chemicals in the runoff. These predictions involve many variables and unknowns (for example, the amount of precipitation that will occur, whether winters will be severe or mild, which in turn determines the amount of salt required to keep roadways in safe driving conditions; and the movement of salt through the ground and groundwater). We expect, however, that these impacts from proposed I-494 will not be significant.

I We have corrected this reference to read ". . .the analysis of salt concentrations in the lake. . ."

J See H

K We estimate that the amount of runoff entering Schmidt Lake because of I-494 will be minimal and will result in little damage to plant and algae life in and around Schmidt Lake. Using the severed one-acre of the lake as a sedimentation pond should allow some settling out of pollutants prior to the runoff entering the main body of the lake.

L Lemay, Rogers, Hornbeam and Horseshoe Lakes are among the lakes in northern Dakota County that the United States Geological Survey (USGS) has started to monitor for water quality. Since the amount of runoff from the highway reaching these lakes will be only minimal (see delineation of areas in Fig 6-10, p 111), de-icing chemicals from the highway should raise the chloride levels in these lakes very little, if any at all. Mn DOT will continue its coordination with the USGS and the local cities after I-494 is constructed to ensure that chloride and salt concentrations do not exceed permissible levels. (Again, this is unlikely because of the small amount of highway runoff that will be reaching these lakes.)

Gun Club Lake, since it will receive the overflow from Sedimentation Pond No. 2 (see Fig 6-10, p111), will receive a larger quantity of highway runoff. Because of the flushing action and periodic floods in the floodplain, the lake should not have any appreciable build-up of chemicals from the runoff. As the DEIS indicated, flood waters flush lakes in the flood plain an average of 3 out of 4 years. As yet, a monitoring program has not been established for Gun Club Lake.

Minnesota Pollution Control Agency

SEP 02 1977

Kermit K. McRae
Division Director
Transportation Services
Bureau of Policy and Planning
Minnesota Department of Transportation
Transportation Building
John Ireland Boulevard
St. Paul, Minnesota 55155

Re: Draft Environmental Impact Statement
Interstate 494

Dear Mr. McRae:

In response to the Draft Environmental Impact Statement (EIS) and the water quality report for 494 in Bloomington, Minnesota and South St. Paul, comments for inclusion in the Final EIS are as follows:

A 1. The way in which data is presented on page 90 provides little information as to the existing water quality and ,in fact, distorts the data. The water quality information contained in the water quality report prepared by the District 9 Hydraulics Section should be summarized by providing mean concentrations rather than a range of values. Anomalous values that may distort the mean should not be included in the averaging.

B 2. It is unclear how the expected concentrations of chloride were calculated. Available literature would tend to support the information on yearly concentrations ,however, the spring flush could be somewhat different. This is primarily affected by the volume of water considered as dilution water.

C 3. On page 90, the Draft EIS indicates that stormwater runoff is not considered a point source. Stormwater runoff, however, from highway projects generally falls under the category of point sources due to the fact that a discreet conveyance is used from which pollutants are or may be discharged. Generally, point source discharges require National Pollutant Discharge Elimination System (NPDES) Permits. In the Federal Register dated May 22, 1973, however, there is an exemption for uncontrolled discharges composed entirely of stormwater runoff. Uncontrolled discharges of runoff are excluded from the permit requirements unless they are determined to be significant contributors of pollution. As you have indicated, this determination is made by the U.S. Environmental Protection Agency (EPA) or the Minnesota Pollution Control Agency (MPCA).

D 4. On page 93, a discussion of the probable impacts to lakes and wetlands is provided. Due to the fact that there will be a loss of wetlands and lakes as a result of the proposed project, there should be a discussion of the replacement of those resources lossed. A discussion on ponding areas provided for the containment and control of highway effluent is presented in the water quality report and should be included in the EIS. Compensation for those wetlands and lakes lossed, along with information on the amount of wetlands lossed and the amount of compensation provided is important in evaluating the project.

E 5. Mitigation measures are discussed in the water quality report for containment of spilled materials as a result of accidental spills. There should be a discussion on those areas where mitigation is not proposed. It is mentioned on page 97 that if a spill were to occur in an area where natural containment is not possible, an inflatable boom could be dispatched to the scene and used to surround and contain the spilled material. As you know, this can be done only if booms or barriers are readily available and on hand at the time of the spill. It is requested that you provide information on the location of the Minnesota Department of Transportation (MN/DOT) inflatable booms, skimmers, pumps, poly mops or absorbent pads and procedures which will be utilized to employ such mitigation in the event of a spill which reaches waters of the state.

F 6. On page 101, under construction plans, a statement is made that aggregate washwater containing sediments will be treated to concentrations that will be no more than that of the stream in which it will enter. Minnesota Regulations require that discharges of aggregate washwater meet specified effluent standards. Permits are necessary for the discharge of aggregate washwater that require compliance with applicable water quality and effluent standards. The standard specifications for this activity should be modified.

G 7. There should be a discussion of mass transit and other transit alternatives which would result in eliminating or reducing the need and environmental impact of the proposed project. The present transit modes has and will continue to limit growth options for the Twin Cities Metropolitan Area.

H 8. In the summary of the Draft EIS, the discussion on the impact on state government of any federal controls and the multi-state responsibilities are inadequate. There are numerous federal controls that effect state government including federal air, water and noise regulations, National Environmental Policy (NEPA), 4F statements, requirements of FHWA, federal funding, etc. In the area of multi-state responsibilities, the fact that this is an interstate highway effects other states as well as air and water pollution, interstate transportation, the purchase of outstate materials for construction, the use of energy mined, transported and processed outstate, etc.

I If you have any questions, please contact me.

Sincerely,

Curtis J. Sparks
Water Quality Coordinator
Office of Environmental Analysis

CJS:pah

RESPONSE TO MINNESOTA POLLUTION CONTROL AGENCY

A In most of the waterbodies that I-494 will affect, the constituents were measured at several sites over a period of two years. In our estimation, the values obtained are — because of the extremes — more accurately depicted in a range of values than in mean values.

For those desiring it, a more detailed picture of the constituents in these water bodies appears in the "I-494 Water Quality Report." We sent copies of this report to the agencies with expertise in this area (your agency and the Minnesota Department of Natural Resources). We received no adverse comments on the report. This report is available to anyone on request.

B To obtain the data in Table 6-10, "Estimated Salt Concentrations of Area Lakes After Construction," analysts assumed a salt usage of 13 tons per lane mile. This was the average amount used on highways with similar functions and weather conditions as proposed I-494. Runoff factors were 1½ in. seasonal and 4½ in. yearly. No attempt was made to take into account the salt that is retained by plants and soil or that leaches into the groundwater. Thus, the values in Table 6-10 can only be considered rough estimates and are probably higher than what the concentrations will actually be. Most likely, another method of computing would yield different values. (Currently, no nationally approved method of computing concentrations exists).

C Our statement on point source was partially incorrect. We have revised the text to reflect your comment.

D The revised discussion on Wetlands (p 92) contains a Discussion on the Wetlands that I-494 impact and the compensation and mitigation measures that we propose.

Figure 6-10, p 111 depicts the location of ponding areas on the proposed Drainage Plan for I-494. The ponds in the system perpetuate the existing drainage patterns, and certain ones serve as holding ponds or sedimentation basins. The EIS discusses these functions to the extent necessary to assess the impact of the highway runoff. We included a more detailed description of the ponds and their functions in two sub-reports for I-494 — the "Drainage Report for I-494" and the "I-494 Water Quality Report." Again, these reports were made available for review to those agencies with expertise in these areas and are available to anyone on request.

E Mn DOT contacted the MPCA in June 1978 on this issue. The revised text on p110 indicates the current method of handling a spill, as determined in this meeting.

F The FEIS has been corrected. Effluent standards will be met and all necessary permits obtained and complied with

G The proposed highway is consistent with the MC's development plans for the region. And, as we have indicated in the EIS, the MTC, the agency responsible for developing and implementing the transit system for the region, considers proposed I-494 essential for any mode of transit in the proposed corridor.

H State governments are required to follow specified policies, procedures, and design criteria when projects involve federal aid. The overall impact of federal controls on state government is hard to determine because many of the state requirements are more stringent than federal. For example, the state daytime standard for traffic noise levels for residential uses is L_{10} 65 dBA compared to the federal standards of L_{10} 70 dBA. Also, the state requires an indirect source permit (for air quality) and has water quality standards. The AASHTO* standards — the design standards that will be followed on this project — are standards developed with state participation and, thus, cannot be considered entirely federally imposed.

I As far as we can determine, proposed I-494 will not create any problems of air or water pollution for adjacent or distant states.

We can not tell with any degree of accuracy the origin of the interstate traffic that will use the proposed highway (aside from the observations we have made in the DEIS, similar to that in Paragraph 2, p 44). As to other multistate responsibilities, such as the purchase of outstate materials for construction and the use of energy mined and processed in other states — these are options of contractors and can not be determined until the actual time of construction.

*American Association of State Highway and Transportation Officials.

Metropolitan Transit Commission
801 American Center Building St. Paul, Minnesota 55101 612/221-0939

Mr. Harry A. Reed
Deputy Commissioner
Bureau of Policy and Planning
Minnesota Department of Transportation
Transportation Building
St. Paul, MN 55155

RE: FHWA-MN-EIS-77-03-D
Draft Environmental Impact Statement for I-494 in Hennepin and Dakota Counties
Minn. Proj. I-494-4( )
S.P. 1985, 1986 and 2785

Dear Mr. Reed:

We have reviewed the Draft Environmental Impact Statement (EIS) for I-494 from 24th Avenue South in Bloomington to the Mississippi River in South St. Paul and are herewith submitting our comments. Included are general comments regarding this segment of I-494 and more specific comments regarding provisions for transit as part of the design of the proposed facility.

In September 1975 the Metropolitan Transit Commission adopted a report: "Unfinished Portions of the Interstate Highway Systems in the Twin Cities Area - A Position Statement of the MTC." That report supports the completion of I-494 from 24th Avenue to the Mississippi as an "essential connecting Link", but does not endorse a specific alignment or design alternate.

The Metropolitan Transit Commission feels that buses operating in mixed traffic, with provisions, as necessary, for preferential treatment at points of access and egress is adequate on I-494. Consideration for reserving additional right-of-way for transit purposes is only appropriate where doing so does not adversely affect adjacent urban development.

A major park-ride facility is proposed at I-494 and I-35E. The design of this facility should be an integral part of the design of I-494 to assure maximum accessibility and minimum delays for buses and transit patrons; thus, encouraging the use of transit. However, no mention of this facility is made in the statement. This should be corrected in the final version.

A

In reviewing the draft EIS, we do not find a discussion of the impact, both direct and secondary (due to land use changes), I-494 will have on existing and proposed transit and paratransit services, including the cost of providing those services to third and fourth ring suburbs.

B

We also find no discussion of the effect the land uses' changes associated with the highway construction will have on energy use. We feel such an evaluation and discussion should be made and included as part of the Final EIS.

C

In summary, the I-494 Final Environmental Impact Statement should include an evaluation and discussion of the major park-ride facility near I-35E, the secondary effect the highway will have on transit and paratransit services and the cost of providing those services, and an evaluation and discussion of the energy use resulting from changing land uses within Northern Dakota County. All these evaluations are important to a definitive EIP.

Upon its completion, we wish to receive a copy of the Final Environmental Impact Statement.

Sincerely,

Camille D. Andre
Chief Administrator

CDA/DRJ/pjk/19

RESPONSE TO METROPOLITAN TRANSIT COMMISSION

A

Mn DOT has been working with Metropolitan Transit Commission to develop policies and procedures for the construction and maintenance of park and ride sites. Basic questions such as locations, who should construct, who should own, and who should operate have not been resolved.

Although we favor the concept of park and ride sites as a means of reducing future traffic demands, we can not address a specific site on the I-494 project at this time. It seems, however, that we will not be constructing a park and ride site at the interchange of I-494 and I-35E. To be functional, park and ride sites should be constructed at a site with land access, not freeway to freeway access. Mn DOT will coordinate with MTC during the design of the project in order to develop an acceptable park and ride site.

B

The impact that I-494 will have on existing and possible future proposals for transit and paratransit services is difficult to quantify. I-494 could stimulate or require re-routing of local bus service routes, or it could be a cost-effective means of accommodating express buses and some types of paratransit trips. Other transit and paratransit impacts are too dependent on other actions or policies to be that much affected by I-494 or to be discussed in the EIS.

C

Increases in development in the project area, including the area transportation system (of which proposed I-494 is a part), have been planned for. Energy, water, and sewer needs have been considered by the MC during the development of their Development Framework Guide and, deemed feasible to meet. Otherwise, the MC wouldn't encourage development in the area.

METROPOLITAN COUNCIL
Suite 300, Metro Square Building, Saint Paul, Minnesota 55101

MEMORANDUM August 25, 1977

TO: Physical Development Committee &
Transportation Subcommittee

FROM: Transportation Staff (Connie Kozlak)

SUBJECT: Environmental Impact Statement for I-494, Dakota County
Metropolitan Council Referral File 4723

Attached is a staff review of this Environmental Impact Statement for your consideration. A draft was sent to Mn/DOT and the report was revised after Mn/DOT review.

This facility has been previously reviewed by the Council as part of the Transportation Policy Plan and the Interstate Study Report in 1976. The proposal is substantially consistent with metropolitan policies. The major issue appears to be whether there should be a direct interchange between I-494 and TH 55. Previous Council recommendations have been that there is no need for a direct connection and there is nothing in the E.I.S. to suggest that a change in this stance is necessary.

RECOMMENDATION

That this report be forwarded to the Minnesota Highway Department as the official comments of the Metropolitan Council on the draft EIS for I-494 in Dakota County.

Attach.
CK:lh

I. Authority to Review

The passage of the National Environmental Protection Act in 1970 established the requirement that an environmental impact statement (EIS) be written for all major federally-funded projects, including highways. In 1971 the Federal Highway Administration issued guidelines for preparation of highway EIS's. Either an EIS or a negative declaration statement must be prepared on any major highway project which did not have FHWA location approval prior to February, 1971. The draft EIS must be circulated to federal, state and local agencies with jurisdiction by law or special expertise with respect to any environmental impact involved, and these agencies must be given at least 45 days to return their comments. All submitted comments on the draft EIS must then be taken into account in the preparation of the final EIS.

Under state law (M.S. 473.167) the Council, after consultation with the MTC, must approve all controlled access highways as consistent with the policy plan and Development Guide. This approval will be given at the time the Council reviews the final EIS. Action on the referral currently before the committee should be limited to comments which can be used by Mn/DOT to improve the final document, including a determination of consistency with Council policy.

Two segments of this proposal also fall within the Mississippi River Critical Area Corridor and must be reviewed by the Council for its consistency with the interim development regulations.

II. Project Description

In accordance with FHWA guidelines, on July 29, 1977, the Minnesota Department of Transportation submitted for Metropolitan Council review its draft Environmental Impact Statement for I-494 in Dakota County. Comments are requested by September 15, 1977, although a public hearing will be held by Mn/DOT on the EIS on August 25.

I-494 is proposed as a controlled access freeway along a new E-W alignment between existing termini of I-494 in Bloomington and in South St. Paul, running parallel to and south of TH 110 for much of its length (see map). This 10.2 mile section is the only uncompleted portion of the I-494/694 beltline route that encircles the Twin Cities. The section will be a six-lane rural design (wide median) freeway passing through the cities of Bloomington (Hennepin County), Eagan, Mendota Heights, Inver Grove Heights, Sunfish Lake and South St. Paul (all in Dakota County).

This EIS examines three alternates (B1, B2 and B3), all basically on the same alignment (see attached map), in addition to the no-build option and a historical alternate, Alternate A, which, after the Minnesota River crossing, went north on I-35E and then east on TH 110. Alternate B1 includes proposed I-494, a relocated section of TH 55 and improvements to existing TH 5, TH 55, TH 49 and I-494. Alternate B2 is a staged version of B1, including the same improvements as B1 except relocated TH 55. Provision would be made to add this relocation in the future, if needed. Alternate B3 contains the same improvements as B2 except B3 forecloses any provision for a relocated TH 55.

Interchanges on the new segment are proposed for TH 5, Pilot Knob Road, I-35E, TH 49, TH 110/Robert Street and TH 3. Alternate B1 also includes an interchange with TH 55 and Alternate B2 includes provision for such an interchange in the future.

Cost of this facility is estimated by Mn/DOT at about $100 million.

III. Background

Four public hearings were previously held on this segment in 1956, 1958, 1963 and 1970. Proposed I-494 is shown on the land use plans of all the affected cities and Dakota County. The location was approved by the Bureau of Public Roads (predecessor of the Federal Highway Administration) in 1959 and 1963. Location and design were also approved by FHWA on the segment west of the Chicago, Milwaukee, St. Paul and Pacific Railroad (just west of TH 55), and work commenced on this section in 1971. All work on I-494, except preparation of this EIS, was stopped by a stipulation in 1974, the outcome of a lawsuit brought by MPIRG, the Dakota County Environmental Protection Association and the Convent of the Visitation.

Construction cannot recommence until after the necessary additional hearings, reports and approvals, which could be by 1979 with completion of the proposal by 1983. About 900 acres of right-of-way have already been acquired. 679 additional acres are required for Alternates B1 and B2, mostly in Eagan, Mendota Heights and Inver Grove Heights. Approximately 429 additional acres would be required for Alternate B3.

The Metropolitan Council has previously reviewed layouts only for the segment of I-494 from Delaware Ave. east through South St. Paul (Referral 760, 1971). The Council found these layouts consistent with the policies of the Metropolitan Development Guide. It expressed concern about storm water runoff and recommended against a dead end of Salem Church Road at South Robert Street, which had been requested by the residents of Sunfish Lake.

IV. Discussion

A. Development Framework (Bob Mazanec)

I-494 and the communities it affects are well within the Metropolitan Urban Service Area. Therefore, construction of this facility is consistent with Development Framework policies.

As part of the system statement process, Mendota Heights has raised concerns about the functional classification of highways in the area. The City requested reclassification of TH 110 (from an Intermediate to a Minor arterial) and TH 55 (from a Minor to an Intermediate). The classification of I-494 as a Principal Arterial was not questioned, and in fact, was part of the justification for the request on TH 110. Those requests are still being considered by the Council.

New population, household and employment forecasts will be adopted later this year which should be used for planning purposes. Their implication is that the I-494 area will continue to be a relatively high growth area as the EIS assumes, but in absolute terms the amount of growth will be somewhat less than assumed. In other words, the trend is the same as before but the amounts of increase have become smaller.

B. Investment Framework

Most of the discussion of economic impacts in this EIS centers around the tax base growth induced by the road. Because of the long term planning effort and the lack of major corridor revisions, the Dakota County development pattern has occurred in anticipation of the construction. The "fact" of construction may add little to what has already been planned because of the "anticipation." However, in evaluating the economic impact of any major facility an EIS should consider the costs of additional public services or rerouting of planned services or facilities as well as the growth in the tax bases. Of particular importance in this case is the impact on the cost and efficiency of operations of local public safety and street maintenance programs because of the small pieces of Eagan, Mendota Heights, Sunfish Lake and Inver Grove Heights that will be less accessible from the larger parts of those cities? (Additional call time and costs to provide service from the nearest fire/police station should be illustrated.) Can mutual aid contracts be approved that will allow Mendota Heights personnel to service Eagan properties isolated by I-494, etc.? Would some land exchanges be better? Why wasn't the proposed highway designed along the city boundary between Eagan and Mendota Heights? These have not been addressed in the EIS.

A

C. Environmental (Lynne Takemoto)

1. Mississippi River Corridor Critical Area

Two portions of the I-494 project are located within the Mississippi River Corridor Critical Area. The proposed I-494 crossing of the Minnesota River valley forms part of the Critical Area boundary. In South St. Paul I-494 lies within the Critical Area from the Concord Street interchange to the west bank of the Mississippi. Mn/DOT has proposed reconstruction of this interstate segment from 4 to 6 lanes.

The construction and reconstruction of transportation facilities is permitted in accordance with the standards and criteria of the Interim Development Regulations for the Critical Area Corridor. Applicable guidelines deal with the scenic impact of the project and maximization of scenic potential, long-term and construction related impacts on environmentally sensitive areas, and impacts on recreation open space resources.

Crossing the Minnesota River valley, the I-494 bridge will pass through Fort Snelling State Park. The right-of-way was acquired in 1966 and designated for Mn/DOT's use when the surrounding area was purchased for the park. Approximately 20 to 30 acres of additional parkland on the east shore will be needed for a sedimentation pond, drainage pipe, and ditch. These uses will have no impact on park facilities and may be jointly used by DNR in the operation of the park. The continuity of trails and other park uses will be maintained beneath the bridge.

The Mississippi River Corridor Critical Area was so designated by executive order of the Governor of Minnesota, not by the State Legislature, as indicated in the draft EIS.

With respect to impact on environmentally sensitive areas and scenic effect, the proposal is substantially consistent with the Interim Development Regulations.

2. Air Quality

Mn/DOT has conducted an air quality analysis of the project for carbon monoxide (CO) impact. No adverse impacts were noted. Both the MPCA and the U.S. EPA have indicated that the analysis is adequate.

The draft EIS does not consider the potential impacts of other mobile source pollutants - hydrocarbons (HC) and oxides of nitrogen (NO_x). For large scale projects, an assessment of the major mobile source pollutants, CO, HC, NO_x should be standard practice. It is not likely that such an assessment for I-494 would identify adverse air quality impacts. To the contrary, it is possible that elimination of points of congestion and provision of a more efficient transportation system may yield a direct air quality benefit.

3. Natural Resources

The draft EIS has assessed probable impacts on vegetation, wildlife, floodplain areas, water quality and other environmentally sensitive resources. For the most part the analysis is adequate. There are, however, two points which should be clarified in the final EIS.

a. While the analysis of water quality impacts of storm water runoff is adequate, the conclusion of this section seems to imply that storm water runoff is not a significant contributor of pollution unless identified as a "point source." Available research strongly indicates that storm water runoff can be a significant pollutant contributor, regardless of "point source" designation.

b. The draft EIS indicates that the Minnesota Valley National Wildlife Refuge is a proposed federal facility. The Refuge was established by President Ford in 1976.

D. Parks and Open Space (Bob Nethercut)

As stated in the EIS, I-494 was jointly planned and land was jointly acquired with Ft. Snelling State Park. There are no other major impacts in relationship to Parks and Open Space noted in the draft EIS.

E. Transportation

The Metropolitan Council has previously endorsed the completion of I-494 as consistent with metropolitan goals and policies. This endorsement has occurred in previous referral actions, in adopting the Transportation Policy Plan (1976), and in adopting the Interstate Study Report (1976). The Interstate Study Report found, in addition, that this segment is necessary to maintain the integrity of the National Interstate System. This facility was also included in the system statements submitted to the affected municipalities.

The major transportation issue posed in this EIS is the need for a direct intersection of TH 55 with I-494. Alt. B1 contains this direct connection; Alt. B2 contains provision for it in the future. Alt. B3 does not contain either. As is mentioned several times in the EIS, the Metropolitan Council has previously stated that a direct connection is not necessary. The Interstate Study Committee also recommended that TH 55 remain in its present alignment and that a direct interchange between TH 55 and I-494 be de-emphasized, with access provided instead by other minor arterial routes.

B

There is not much detail provided in this EIS on Alternate B3. There is no layout nor traffic volumes presented although these are given for Alternates B1 and B2. Alt. B3 is similar to B2, however, the final EIS should include this detail on Alternate B3 as well. However, the concept of B3, that is, retention of TH 55 on its present alignment with no direct interchange to I-494, appears to be more consistent with Council policy and previous Council action on I-494 than the other 2 alternates.

C

The traffic assignment numbers in this EIS are based on outdated population and employment forecasts. This is understandable since the new forecasts have only recently been completed for preliminary review. However, the more recent forecasts should be used in preparing the actual design of the road.

V. Findings

1. Construction of I-494 in the proposed corridor is consistent with Development Framework policies.

2. Several questions, as detailed in the discussion, regarding economic impact of I-494 are unanswered in the draft EIS.

3. The proposal is substantially consistent with the Interim Development Regulations for the Mississippi River Critical Area.

4. The air quality analysis for CO is adequate. NO_x and HC are not analyzed although it is not likely such an analysis would reveal any adverse air quality impacts.

5. The analysis of impacts on environmentally sensitive resources is adequate except the conclusion of the storm water runoff assessment needs clarification.

6. There are no major impacts on Ft. Snelling State Park, which was planned jointly with I-494, or other parks or recreation open space areas.

7. Construction of I-494 in the proposed corridor is consistent with the Transportation Policy Plan, and is essential to maintain the integrity of the national interstate system.

8. Available data indicates that construction of a direct connection between TH 55 and I-494 is not necessary; neither is the relocation of TH 55.

9. The traffic assignment numbers used in this EIS are outdated although they are adequate for the EIS. More recent numbers should be used for actual design of the facility.

VI. Recommendations

1. It is recommended that Mn/DOT be informed that construction of I-494 is consistent with metropolitan policies and has a high priority in the Transportation Policy Plan.

D 2. It is recommended that Mn/DOT be informed that a direct connection between I-494 and TH 55 does not appear to be necessary.

3. It is recommended that the following changes be made in preparing the final EIS:

E a. The population and employment figures on p. 33 are now outdated. These should be corrected in the final EIS, or at least a date should be added to the Metropolitan Council as "Source" to reflect that they are not the most recent Council projections.

F b. The questions raised in the discussion under Investment Framework should be addressed.

G c. Reference to the Mississippi River being designated a critical area by the state legislature should be corrected to recognize that designation was made by executive order of the Governor of Minnesota.

H d. The conclusion of the storm water runoff section in the EIS should be revised.

I e. The Minnesota Valley Wildlife Refuge was designated in 1976 and should not be referred to as "proposed."

4. It is recommended that the following issues be considered by Mn/DOT in further studies and design of I-494, although they do not necessitate changes in the EIS itself.

J a. The Department should give consideration in designing the Minnesota River Bridge and elevated portions of I-494 in South St. Paul to designs which maintain an uninterrupted view of the river and river valley for motorists and other highway users. This would permit the functioning of these segments as extended scenic overlooks.

K b. In developing detailed engineering plans for I-494 the Department should consider the specific guidelines of the Interim Development Regulations for the construction of transportation facilities.

L c. The Department should obtain local permits for grading and filling as required by the Interim Development Regulations.

M d. The Department should seek to minimize the impact of I-494 on the natural environment of the Minnesota River Valley through appropriate revegetation and screening of the embankment and bridge structures.

e. The latest Metropolitan Council projections of population, households, employment and traffic assignments should be used in preparing detailed designs of this facility.

N 5. It is recommended that future Mn/DOT air quality studies of major highway projects incorporate impact assessments of CO, HC, and NO_x as standard practice.

RESPONSE TO METROPOLITAN COUNCIL

Moving the major traffic flows from the TH 5-Mendota Bridge-TH 110 link to I-494 should lessen police, fire, and ambulance calls on the highway (existing link). Because of the reduction in congestion, we expect a substantial reduction in accidents. Thus, the nearby cities — Mendota Heights and West St Paul — should have considerably less emergency situations to respond to. This should mean a reduction in the expenditures for police, fire, and ambulance calls.

Because proposed I-494 closely follows boundary lines, it will not create the need for additional public services or cause the rerouting of planned services or the relocation of existing or planned facilities in project area cities. The proposed highway will not have a negative impact on the public safety and street maintenance programs. Because of the reduction in congestion on local streets and highways, costs of these operations should be reduced and their efficiency improved.

Proposed I-494 will not render parts of the cities inaccessible to larger parts. In Sunfish Lake, where the only severance occurs, accessibility between separated sections will be maintained. A bridge will carry Salem Church Road (currently a gravel road) over the proposed highway (see Fig 5-2, p 57). A frontage road, proposed to extend from Salem Church Road to Pieper Road (a gravel road south of Salem Church Road), will provide access to the three homes and the western portion of Pieper Road that proposed I-494 would otherwise isolate. Access for maintenance operations on the eastern portion of Pieper Road will be via TH 52, just as now.

A

The proposed highway will follow the Eagan and Mendota Heights boundary. It will not sever small strips of land from the cities. Small areas not taken up by the actual construction will be part of the highway R/W. This will be true of the construction along the whole length of the Eagan-Mendota Heights boundary line. Mn DOT will notify public utility companies and municipalities of any of their properties (pole lines, conduits, gas pipes, water pipes, sewers, and tile lines) located within the highway right-of-way that must be removed or relocated to complete the project. Before starting construction operations adjacent to utility property, Contractors will be required to arrange for the protection of the property and continuation of service to the owners satisfaction.

B Figure 5-2 , p 57) shows a layout of Alt B3. Figure A-3, p 209, gives an estimate of the traffic volume on B3.

C New traffic numbers—based on new population, employment, and dwelling unit projections—will serve as basis for I-494's design.

D Alternate B3, the Selected Alternate, will not include the relocated section of TH 55 or a direct connection between TH 55 and I-494.

E The FEIS contains the updated projections (p 33). For comparison, we have retained the old figures in Table A-3, p 211.

F See Response A

G We have made this correction in the FEIS (p 39).

H Page 108 of the FEIS contains a revised discussion on point source and storm water runoff.

I Mn DOT checked with the USFWS regarding your comment. The Minnesota Valley National Wildlife Refuge has been designated as you state. The boundaries were defined in October, 1976, although some changes might occur if the USFWS has problems in acquiring the property. The reference to the refuge has been changed to read "designated" in the EIS.

J The consideration you have mentioned will be a feature of our river bridge, to the extent that safety and economic concerns will allow.

K Mn DOT will follow Interim Development Regulations in the construction of I-494 and will obtain all necessary permits.

L These considerations are part of our planned mitigation for the river valley (with consideration given to DNR's Park Management plans and our own safety and maintenance policies).

M See Response C

N Future Mn DOT Air Quality studies on major highway projects will include assessments of CO, HC, and NO_X, as you suggest.

August 9, 1977

Mr. John Boland, Chairman
Metropolitan Council
300 Metro Square Building
St. Paul, Minnesota 55101

Dear Mr. Boland:

We have reviewed your copy of the Minnesota Department of Transportation Draft Environmental Impact Statement for I-494 from 24th Avenue in Bloomington to the Mississippi River Bridge in South St. Paul. (Metropolitan Council Referral File No. 4723)

A Our comments to this proposed public improvement relate only to the effect that this improvement has on the location, use, maintenance and accessibility of Metropolitan Waste Control Commission facilities. It would appear that the proposed reconstruction of I-494 between Concord Street and the Mississippi River and the construction of the South St. Paul Industrial Penetrator Road would impact our metropolitan facilities in that area. Therefore, we request that the Minnesota Department of Transportation and the City of South St. Paul coordinate their proposed construction to protect our facilities. Preliminary engineering plans should be submitted to the Commission for review and comment.

We thank you for the opportunity to review and comment on this Draft Environmental Impact Statement.

Sincerely,

Richard J. Dougherty
Chief Administrator

RJD:RAO:bdw

350 METRO SQUARE BLDG.
7TH & ROBERT STREET
SAINT PAUL, MN 55101
612 222-8423

RESPONSE TO WASTE COMMISSION CONTROL

A The reconstruction of I-494 in So St Paul and the eventual construction of the industrial penetrator road should provide improved access to the MWCC's facilities in the area.

As in the past, we will continue to closely coordinate our plans for construction in the area with the City of So St Paul.

Preliminary plans will be submitted to the MWCC for review and comment.

the city of Bloomington minnesota
2215 WEST OLD SHAKOPEE ROAD–55431–(612)881-5811

August 25, 1977

Mr. James Harrington,Director
Minnesota Department of Transportation
Transportation Building
St. Paul, Minnesota 55155

Dear Mr. Harrington:

Enclosed for your information is a copy of Resolution No. 77-120 which was passed and adopted by the City Council of the City of Bloomington, Minnesota, on August 22, 1977.

This resolution is in support of the Draft Environmental Impact Statement for Interstate 494.

If you have any questions regarding this resolution, please contact our office.

Sincerely,

Arthur W. Jensen
City Clerk

cp

Enclosure

AN AFFIRMATIVE ACTION/EQUAL OPPORTUNITY EMPLOYER

RESOLUTION NO. 77-120

A RESOLUTION IN SUPPORT OF THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR INTERSTATE 494

WHEREAS, the City Council of the City of Bloomington has reviewed and discussed the preliminary plans identified as "Layout 15" and the "Draft Environmental Impact Statement for Interstate 494" as prepared by the Minnesota Department of Transportation (MnDOT) for the proposed completion of I-494 between 24th Avenue in Bloomington and the Mississippi River bridge in South St. Paul; and

WHEREAS, on October 2, 1972 the City Council adopted the Eastern Area Plan, which plan incorporated the concept of a completed I-494 and an improved TH 5/I-494 interchange as proposed by MnDOT; and

WHEREAS, on May 10, 1976 the City Council adopted the Interim Comprehensive Plan which incorporated the concept of a completed I-494 and an improved TH 5/I-494 interchange as proposed by MnDOT; and

WHEREAS, the City Council has determined that the proposed completion of the I-494 beltline freeway is in accordance with the adopted Eastern Area Plan and the adopted Interim Comprehensive Plan; and

WHEREAS, documentation and testimony has indicated a need to complete this segment of the I-494 beltline freeway; and

WHEREAS, the existing roadways and bridges currently serving as alternate travel routes through this area are experiencing excessive levels of traffic flow causing frequent periods of congestion on functionally inadequate facilities; and

WHEREAS, the City Council is of the opinion that the proposed completion of I-494 will be of significant benefit to the City of Bloomington and the entire metropolitan area; and

WHEREAS, the City Council has determined that the proposed improvement is in accordance with community need and objectives; and

WHEREAS, the City Council does not find the concept of the proposed improvement in conflict with environmental or land use goals in the community; and

WHEREAS, the City Council encourages the completion of I-494 with high standards of access, with adequate design to carry anticipated traffic loads, with provision for minimizing noise and air pollutant effects, and with provision for minimizing the impact upon the natural environment; and

WHEREAS, the City Council approves the basic corridor and preliminary design plans contained in the Draft Environmental Impact Statement for Interstate 494 as they affect the City of Bloomington with the following recommendations:

A 1. That the final Environmental Impact Statement text and map regarding existing land use in eastern Bloomington be corrected;

L 2. That the final Enviornmental Impact Statement text and maps reflect current status and alignment of TH 36 which is now under construction;

B 3. That this project include those necessary improvements to 24th Avenue, such as bridges, interchange geometrics, and I-494 land upgradings, and be coordinated with Hennepin County and the City of Bloomington and be completed concurrent with the work on I-494;

C 4. That provision for intersection signalization and pedestrian movement at the 24th Avenue and 34th Avenue interchanges be made part of the project;

D 5. That the 34th Avenue eastbound on-ramp to I-494 and TH 5 be of sufficient width to carry three lanes of traffic in the "common" portion of the roadway;

E 6. That I-494 right-of-way and the Minnesota River Valley National Wildlife Refuge acquisitions and development plans be coordinated with particular regard to refuge access and facility locations; and

F 7. That drainage from the western portion of the I-494 bridge be studied in more detail and be submitted with design plans;

and

-2-

G WHEREAS, the City Council further recommends that the City of Bloomington be provided adequate opportunity to review and comment upon all plans and programs relating to right-of-way acquisition, roadway design, erosion and sedimentation control during and after construction, grading and drainage control, noise and air pollution controls, and landscaping prior to their implementation; and

WHEREAS, this matter was discussed at length at a regularly scheduled meeting of the Bloomington Planning Commission which unanimously adopted the provisions embodied by this resolution;

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF BLOOMINGTON IN REGULAR MEETING ASSEMBLED, that the Minnesota Department of Transportation be directed to proceed with construction of I-494 between 24th Avenue in Bloomington and the Mississippi River bridge in South St. Paul within the concept delineated in the proposed corridor as contained in the Draft Environmental Impact Statement for Interstate 494.

BE IT FURTHER RESOLVED, that the City Clerk of the City of Bloomington is hereby directed to forward a copy of this resolution to Charles E. Burrill, District Engineer, Minnesota Department of Transportation, P. O. Box 2050, North St. Paul, Minnesota, 55109, and to James Harrington, Director, Minnesota Department of Transportation, Transportation Building, St. Paul, Minnesota, 55155.

Passed and adopted this 22nd day of August, 1977.

Mayor

Attest:

City Clerk

RESPONSE TO CITY OF BLOOMINGTON

A We attempted to depict the land use in your eastern area as accurately as possible (Figs 4-1 and 4-2). Because of the small scale of our map, we had to exclude some of the fine details. Also, we didn't break our descriptions down as far as the City of Bloomington (for example, we didn't differentiate between single and multi-family residential uses or types of commercial development). Basically, however, we provided the same information. (We contacted your Planning Commission's office during the preparation of the FEIS regarding this.)

B The FEIS reflects the current status and alignment of TH 36 (pages 20 and 21).

C The construction of proposed I-494 will include the necessary improvements at 24th Av and will be coordinated with Hennepin County and the City of Bloomington.

D Provisions for traffic signals and pedestrian movements at these interchanges will be made as appropriate. The design plans for the construction in Bloomington will be coordinated with the City.

E Mn DOT's designers are studying this. Mn DOT will coordinate with the City on this also.

F We're in the process of coordinating our proposals with the US Fish and Wildlife Development plans for the National Wildlife Refuge. We've met with them several times since publishing the DEIS. (See the Discussion on Mn DOT's coordination with USFWS on p 128).

G The construction plans that are submitted to the City for review will include drainage details.

PHONE 454-8100

CITY OF EAGAN
3795 PILOT KNOB ROAD
EAGAN, MINNESOTA
55122

October 11, 1977

Mr. Jim Harrington, Commissioner
Minnesota State Department of Transportation
411 Transportation Building
St. Paul, MN 55155

Dear Mr. Harrington:

Re: F.H.W.A. - M.N.-EIS-77-03-D, Draft Environmental Impact Statement I-494 in Hennepin and Dakota Counties

Enclosed is a copy of a Resolution that was passed by the Eagan City Council at their last regular meeting held on Tuesday, October 4, 1977. The Resolution addresses the City of Eagan's position on the construction and corridor alignment for the proposed I-494.

The City of Eagan is in unanimous support of the construction of I-494 and favors the B-2 corridor alignment. The Eagan City Council is requesting that this Resolution be included as a part of the final Environmental Statement for Interstate 494.

If you have any questions regarding the City of Eagan's position on this proposed interstate construction, please feel free to contact my office at any time.

Sincerely,

Thomas L Hedges

Thomas L. Hedges
City Administrator

skk

enclosure

RESOLUTION

CITY OF EAGAN RESOLUTION SUPPORTING I-494 CONSTRUCTION

WHEREAS, City of Eagan officials have addressed the matter of an east/west freeway for nearly twenty years; and

WHEREAS, the City of Eagan comprehensive plan documents prepared in 1974 reflect the construction of a freeway entitled "I-494" along the northern border of Eagan; and,

WHEREAS, Eagan officials have supported such freeway construction for nearly twenty years; and,

WHEREAS, Eagan officials have addressed the four alternate corridor proposals for the proposed I-494 for the past several years;

NOW THEREFORE BE IT RESOLVED, by the City Council of the City of Eagan that the City Council hereby unanimously supports the construction of I-494 between the Minnesota River and the Mississippi River; and,

BE IT FURTHER RESOLVED, that the City of Eagan supports Alternate B-2, which is in essence a long term staging of Alternate B-1 where I-494 would be constructed without relocated T.H. 55 but would include design and right of way provisions to do so in the future;

A

BE IT FURTHER RESOLVED, that the City of Eagan reserves the opportunity to view with MnDOT staff and officials the option of an interchange at either the intersection of County Road 31 or T.H. 13 to determine which proposal is most suitable for the City of Eagan; and,

B

BE IT FURTHER RESOLVED, that copies of this resolution be forwarded to all concerned parties.

DATED: October 4, 1977

CITY COUNCIL
CITY OF EAGA

ATTEST:

BY: Mayor

City Clerk

CERTIFICATION

I, Alyce Bolke, Clerk of the City of Eagan, Dakota County, Minnesota do hereby certify that the attached is a true and correct copy of Resolution of a Regular meeting of the City of Eagan held on the 4 day of October, 1977.

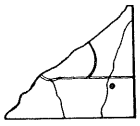
Alyce Bolke
Alyce Bolke, Clerk
City of Eagan

RESPONSE TO CITY OF EAGAN

A As the FEIS indicates (Sec V, Alternates, p 53), Alt B3 was selected as the build-alternate. Alts B1 and B2 were dismissed from consideration because revised projections were lower and indicated that B3 would be adequate for this section of I-494, the inclusion of TH 55 was inconsistent with the Metropolitan Council's transportation plan, and because these alternates have more of an impact on undeveloped land and wetlands than Alt B3.

B Subsequent to the publication of the DEIS and the 25 August 1977 public hearing, Mn DOT made a study in which it considered interchanges at CSAH 31 and TH 13. Mn DOT was involved in several public meetings with the City of Eagan regarding the study. Results of the study are given in the response to Comment C on p 142.

City of Mendota Heights
BANK BUILDING
750 SOUTH PLAZA DRIVE • MENDOTA HEIGHTS, MINNESOTA 55120
TELEPHONE (612) 452-1850



August 18, 1977

Mr. James Harrington
Commissioner of Highways
Department of Transportation
St. Paul, Minnesota 55155

Dear Mr. Harrington:

I am herewith enclosing a copy of a resolution entitled "Resolution Supporting I-494 Construction Concept," which was unanimously adopted by the Mendota Heights City Council on August 16th. This is the stance of the City Council in preparing for the upcoming hearing on the I-494 Environmental Impact Statement.

The Council has asked that a copy of the resolution be submitted to you so that you may be made aware of the Mendota Heights position on this matter.

Very truly yours,,

Orril J. Johnson
City Administrator

OJJ:kms

Enclosure

CITY OF MENDOTA HEIGHTS
Dakota County, Minnesota

RESOLUTION NO. 77-68

RESOLUTION SUPPORTING I-494 CONSTRUCTION CONCEPT

WHEREAS, Mendota Heights officials have addressed the matter of an east/west freeway for nearly twenty years; and

WHEREAS, the Mendota Heights comprehensive plan documents prepared in 1959 reflect the construction of a freeway along the southern border of Mendota Heights; and

WHEREAS, Mendota Heights officials have supported such freeway construction in order to alleviate excess traffic on T.H. 110; and

WHEREAS, Mendota Heights officials have addressed the problems of an I-35E/I-494 interchange for a number of years; and

WHEREAS, these officials have reviewed at least four different interchange proposals for said interchange; and

WHEREAS, Mn/DOT has established a hearing on August 25, 1977 at 7:30 P.M. at the Sibley High School to discuss the merits of a draft environmental impact statement on I-494 between the Minnesota River and the Mississippi River;

NOW THEREFORE BE IT RESOLVED by the City Council of the City of Mendota Heights that the City Council hereby unanimously supports the construction of I-494 between the Minnesota River and the Mississippi River; and

BE IT FURTHER RESOLVED that the findings and conclusions of the Interstate Study Commission in 1976 be supported, to wit:

A 1. That I-494 in this area be a minimum 6-lane facility;

B 2. That there be complete, full interchange facilities between 494 and 35E;

C 3. That the direct interchange between T.H. 55 and the 494-35E facilities be de-emphasized with access provided by local minor arterial routes;

4. That Highway 55 be retained in its present alignment for a long-term basis, thereby eliminating the dual/dual interchange design;

D 5. That planning for a second Mississippi River Bridge at South St. Paul be continued to accommodate future traffic needs;

E 6. That the basic design solutions in the corridor be generally based on the first stage development proposal as presented by the Division of Highways during the course of these sessions, with special emphasis on concerns of all communities;

F 7. That all construction shall be accomplished in a manner so as to provide maximum concern for the impact of noise, vibrations, air, and water pollution on contiguous properties throughout the corridor.

and

BE IT FURTHER RESOLVED, that the City Council supports the concept of Alternate B-3 as described and outlined in the draft Environmental Impact Statement; and

BE IT FURTHER RESOLVED that the Mayor or his representative be directed to appear at the hearing, supporting this proposed construction; and

BE IT FURTHER RESOLVED that copies of this resolution be forwarded to all concerned parties.

Adopted by the City Council of the City of Mendota Heights this 16th day of August, 1977.

CITY COUNCIL
CITY OF MENDOTA HEIGHTS

By Robert G. Lockwood
Robert G. Lockwood
Mayor

ATTEST:

Kathleen M. Swanson
Deputy Clerk

CITY OF MENDOTA HEIGHTS)
COUNTY OF DAKOTA) s.s.
STATE OF MINNESOTA)

I, G.M. Radabaugh, being the duly appointed and Acting City Clerk of the City of Mendota Heights, do hereby certify that the attached Resolution No. 77-68, "RESOLUTION SUPPORTING I-494 CONSTRUCTION CONCEPT," is a true and correct copy of said original resolution on file in my office.

Signed and sealed by my hand this Twenty-fifth day of August, 1977.

G.M. Radabaugh
City Clerk

(SEAL)

RESPONSE TO CITY OF MENDOTA HEIGHTS

A The proposed section of I-494 will have a minimum of six lanes.

B The proposal includes a full interchange between I-494 and I-35E.

C With the selection of Alt B3 as the build-alternate, the proposal will not include the Relocated Section of TH 55. Existing TH 55 will be retained in its present alignment. Access between I-494 and TH 55 will be via local minor arterial routes.

D Mn DOT is continuing plans for a new bridge along I-494 across the Mississippi River.

E The basic design of Alt B3, the Selected Alternate, will be similar to that of the first stage development of the proposal (Alt B2). Mn DOT will continue to coordinate with the local communities as the project develops to determine their concerns and interests.

F Mn DOT's "Specifications for Highway Construction" require contractors to adhere to local regulations regarding noise, vibrations, air, and water pollution during construction. Contractors will use mitigation measures where necessary to minimize social and environmental harm from construction operations. (See discussion on p 116.)

VILLAGE OF *Sunfish Lake* MINNESOTA

October 13, 1977

District Engineer
Minnesota Dept. of Transportation
Division of Highways, District 9
3485 Hadley Ave. No.
P. O. Box 2050
No. St. Paul, Minn. 55109

Dear Sir:

Enclosed herewith please find Resolution passed by the City Council on October 3, 1977 in opposition to the draft of Environmental Impact Statement for Interstate 494.

Yours very truly,

Myra Hamper, Clerk

mlh
Enc.

CITY OF SUNFISH LAKE
COUNTY OF DAKOTA
STATE OF MINNESOTA

RESOLUTION OF CITY COUNCIL
OPPOSING DRAFT ENVIRONMENT IMPACT STATEMENT
FOR INTERSTATE 494

WHEREAS, Sunfish Lake officials have addressed the matter of an East/West freeway for nearly 15 years; and

WHEREAS, Sunfish Lake has opposed the proposed alignment since 1972; and

WHEREAS, Sunfish Lake officials have suggested alternative highway corridors to facilitate the movement of traffic in northern Dakota County; and

WHEREAS, the Chairman of the Planning Commission appeared at the August 25, 1977 hearing at 7:30 p.m. at Sibley High School and orally opposed the current alignment of Interstate 494;

NOW, THEREFORE, BE IT RESOLVED, that the City Council of Sunfish Lake hereby unanimously opposes the construction of Interstate 494 at its current suggested route between the Minnesota River and the Mississippi River; and

BE IT FURTHER RESOLVED, that the Findings and Conclusions for this resolution are as follows:

1. The Draft Environmental Impact Statement for Interstate 494 fails to make a thorough discussion of possible alternative routes in existing corridors;

A

2. The Draft Environmental Impact Statement for Interstate 494 presents no scientific or even unscientific social-economic data setting for the potential impact upon the City of Sunfish Lake by virtue of the bifurcation of twenty percent or approximately twenty families from the whole of the City of Sunfish Lake.

B

3. That generally speaking, the proposed freeway route follows municipal lines and existing highway corridors except through the passage of the City of Sunfish Lake.

4. That the Draft of the Environment Impact Statement for Interstate 494 demonstrates (but without comment) the fact that Hornbeam Lake and Horseshoe Lake (all within the municipal boundaries of the City of Sunfish Lake) will, if the highway bisects them, have a concentration of effluents in excess of Minnesota Pollution Control Agency standards for permissible concentrations.

C

5. The Draft Environmental Impact Statement for Interstate 494 is completely void of any in-depth study of noise, vibration, air and water pollution of contiguous properties throughout the corridor.

D

6. The present alignment of Interstate 494 uses undeveloped land that would continue to provide vegetation, water and other resources for wildlife and human enjoyment rather than existing corridors whether those corridors be noisy (see relationships between airport runways and alignment with Highway 55), industrial (see industrial corridor along Highway 55) and existing highways.

E

BE IT FURTHER RESOLVED, that copies of this resolution be forwarded to all concerned parties.

ADOPTED BY THE CITY COUNCIL OF THE CITY OF SUNFISH LAKE This 3rd day of October, 1977.

Attest:

Myra Hamper, City Clerk

FRED HOMAN, Mayor

RESPONSE TO CITY OF SUNFISH LAKE

A

As the DEIS pointed out, corridor studies were made as early as 1955 and continued on through the public hearings of 1956, 1963, and 1970. Initially, the choice of alignment for the section of the Preferred Corridor from Delaware Av to TH 3 was based primarily on social and environmental considerations. An earlier choice, Alternate B (Fig 5-1, p 51) bisected the City of Sunfish Lake, passing through Hornbeam Lake, and passed through the center of Schmidt Lake in Inver Grove Heights. At the request of the City of Sunfish Lake, and because of the social and environmental disruptions this corridor caused, the corridor was moved south. With this shift, the alignment passed south of Hornbeam Lake and avoided a major severance in Sunfish Lake. The shift in alignment also reduced the encroachment into Schmidt Lake. These changes were acceptable to the cities involved.

At the 1970 Public Hearing, all the cities in the project area indicated a preference for the Preferred Corridor. Subsequently Mn DOT developed for consideration the three alternatives within the Preferred Corridor — Alts B1, B2, B3.

B

Although the proposed highway will separate about twenty homes from the remainder of the city, accessibility between separated sections will be maintained. This separation will not result in any significant social-economic impact on the City of Sunfish Lake. (See discussion in C of responses to the MC, p 190).

C

Although I-494 passes near Hornbeam and Horseshoe Lakes (it doesn't bisect them) it will not have an appreciable effect on either of them. Since the publication of the DEIS, our drainage studies indicate that the elevation of the proposed roadway near Hornbeam Lake is such that the drainage in this area can be directed away from Hornbeam Lake (Fig 6-8 in the DEIS shows a small section of proposed I-494 draining into the lake). Thus, the highway will have no effect on Hornbeam Lake.

Because of an existing agriculture ditch that leads into Horseshoe Lake from the area of proposed I-494, the lake will probably receive a small amount of runoff from the highway. The section of highway draining into the drainage ditch will be about 1,000 ft long. Because of the infrequency of sanding operations, the short section of highway involved, and the retention and percolation that the ditch will allow, the impact on Horseshoe Lake will be minimal.

D

Both the Environmental Protection Agency (EPA) and the Minnesota Pollution Control Agency (MPCA) reviewed the Noise and Air Quality Reports for I-494. The EPA indicated that it didn't expect any adverse impacts to occur as a result of the construction of I-494; the MPCA indicated that it didn't find any inconsistency between the proposal and the State Air Quality Implementation Plan. (See discussion on p 87 of the FEIS.)

The discussion, "Impact on Water Quality," DEIS pages 88-100, was based on three sub-reports — the "I-494 Water Quality Report, the "Geology and Groundwater Data for I-494," and the "Drainage Report for I-494." As the titles indicate, these reports were made exclusively for proposed I-494 and were detailed studies of I-494's impact on rivers, lakes, wetlands, and groundwater. The discussion on the impact on water quality in the DEIS was a summary of the material in these reports.

Page 102 of the DEIS contains references to these reports. They are available to anyone on request. (A copy of the water quality report was sent to the DNR and the MPCA.)

E

We infer from this comment that you favor a corridor along TH 55 similar to the one we discuss in our response to Dayton-Herman (Response E, p 155). As we pointed out in our response to Dayton-Herman, routing proposed I-494 along TH 55 rather than along the selected corridor would be more damaging to the environment, both the natural and man-made.

CITY OF INVER GROVE HEIGHTS
DAKOTA COUNTY, MINNESOTA

RESOLUTION NO. 1822

RESOLUTION REGARDING I-494 AND 1970 RESOLUTION GIVING
CITY APPROVAL OF ORIGINAL PLANS, CITY POSITION

WHEREAS, preliminary plans and a concept for I-494 have been prepared, and

WHEREAS, more information has been made available regarding plans on I-494, and

WHEREAS, final plans have not been completed, and

WHEREAS, the City Council is determined that its positions be transmitted regarding certain aspects of the plans as known thus far.

A THEREFORE BE IT RESOLVED THAT: The City Council is in agreement with the design concept of I-494 but that that concurrence is contingent upon 35E being constructed as originally planned along a route often referred to as Pleasant Avenue Corridor. The entire network is based on an overall plan of which 35E is an integral part. Any attempts to modify or change the concept of 35E will have a profound and disastrous effect upon I-494. Of particular concern is any attempt to divert traffic flows from 35E to the Lafayette Freeway which was never designed or planned to carry the volumes which would occur should there be an alteration of 35E in the overall planning, and

B BE IT FURTHER RESOLVED THAT: The City of Inver Grove Heights cannot support or approve any plan calling for six lanes of traffic on I-494 in Inver Grove Heights unless there are six lanes provided for the river crossing at the Mississippi River between South St. Paul and Newport.

Adopted by the City Council of Inver Grove Heights this 11th day of October 1977.

Eugene Atkins
Mayor

ATTEST:

Ed Kurth
Clerk

RESPONSE TO INVER GROVE HEIGHTS

A The I-35E location and design is unresolved at this time. The MC is currently studying the highway and will prepare an EIS on various alternatives for the uncompleted section.

The MC subjected the Lafayette Freeway to a first-level evaluation as a I-35E corridor to see if it was capable of meeting established federal, state metropolitan, and local transportation goals and policies. This analysis resulted in the Lafayette Freeway being dropped as a possible I-35E corridor because it did not score high enough in meeting the identified transportation goals and policies. Therefore, it will not be included in the I-35E EIS as an alternative corridor.

Until the final design of the highway is known, it will be difficult to estimate the effects on the remaining highways in the Functional Classification Plan, the region's planned system of highways. Diversions to a number of the highways in the system, including I-494 and TH 3, will probably occur. Until 35E is completed, some increase will probably occur on the section of proposed I-494 between the I-494 and I-35E interchange and TH 3 and on the section of TH 3 from proposed I-494 to St Paul.

B Mn DOT is currently considering the possibility of constructing a 6-lane bridge across the Mississippi River (p 20 of the DEIS). This construction will occur somewhat later than I-494, however.

CITY OF
SOUTH ST. PAUL

126 THIRD AVENUE SOUTH
SOUTH ST. PAUL, MINN. 55075

September 12, 1977

Mr. Charles E. Burrill, P. E.
District Engineer
Minnesota Department of Transportation
District Nine
3485 Hadley Ave. No., Box 2050
North St. Paul, Minnesota 55109

re: 319
FHWA-Mn-EIS-77-03-D
Draft Environmental Impact Statement
Interstate 494 in Hennepin & Dakota Counties
Minnesota Project I-494
State Projects 1985,1986 & 2785
from: 24th Avenue in the City of Bloomington
to: Mississippi River Bridge in the City of South St. Paul

Dear Mr. Burrill:

Enclosed is a certified copy of the South St. Paul City Council's resolution dated September 6, 1977 supporting the Minnesota Dept. of Transportation's position for the completion of I-494 to Bloomington. This document is the official position of the City of South St. Paul.

We would like to draw your attention to the last paragraph of the resolution as it pertains to the completion of I-494 between 7th Avenue and the east side of the Mississippi River.

Very truly yours,

Robert G. Simon, P. E.
City Engineer

RGS:it
Encl.

CITY OF
SOUTH ST. PAUL

OFFICE OF CITY RECORDER-TREASURER
451-1287

125 THIRD AVENUE NORTH
SOUTH ST. PAUL, MINN. 55075

South St. Paul, Minnesota

September 6, 1977

Moved by Councilmember Peterson Seconded by Councilmember Buss

RESOLUTION SUPPORTING THE MINNESOTA DEPARTMENT OF TRANSPORTATION FOR COMPLETION OF I-494 FROM SOUTH ST. PAUL TO BLOOMINGTON

WHEREAS, the Minnesota Department of Transportation has prepared and submitted to the City of South St. Paul, the Draft Environmental Impact Statement for comments; and

WHEREAS, the D. E. I. S. addresses itself to the completion of the final link of the Interstate belt system (I-494); and

WHEREAS, I-494 is vital to the economy of South St. Paul; and

WHEREAS, I-494 serves the Industrial, Commercial and Residential needs of the City of South St. Paul; and

WHEREAS, the D. E. I. S. states that the truck traffic generated by the industry in South St. Paul is perhaps the highest in the State of Minnesota; and

WHEREAS, in order to complete the total I-494 project, it will be necessary to extend the construction to the east side of the Mississippi River, including the widening of the Interstate bridge,

NOW THEREFORE, BE IT RESOLVED, that the City Council of South St. Paul supports the Minnesota Department of Transportation in the completion of I-494 between South St. Paul and Bloomington; and

South St. Paul, Minnesota

September 6, 1977

BE IT FURTHER RESOLVED, that the City Council of the City of South St. Paul urgently recommends the inclusion in the I-494 Project the completion of I-494 through the City of South St. Paul, including the reconstruction and relocation of interchanges and the Interstate bridge renovation between 7th Avenue and the east side of the Mississippi River into the City of Newport.

Adopted by the City Council this 6th day of September, 1977.

6 yeas
1 nay-Councilmember Verderosa

/s/ Charles D. McDermott
City Recorder-Treasurer

/s/ Charles A. Michelson
Mayor

CERTIFICATION

I, Charles D. McDermott, City Recorder-Treasurer of the City of South St. Paul and keeper of the records thereof, do hereby certify that the foregoing is a true and correct copy of a resolution duly passed and adopted by the City Council at a regular meeting held September 6, 1977.

City Recorder-Treasurer

SEAL

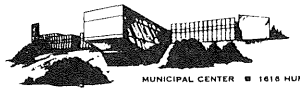
A

RESPONSE TO CITY OF SOUTH ST. PAUL

A

As the DEIS indicates, the inplace section of I-494 through So St Paul is included as part of this proposal. Also included are the reconstruction of the Concord St Interchange and the relocation of the Farwell Av interchange to the site of the proposed Industrial Penetrator Road. This proposal doesn't include any work on the bridge across the Mississippi River Bridge, however. Mn DOT is currently considering the possibility of constructing a new bridge across the Mississippi River. This construction would occur after the proposed section of I-494.

Mn DOT will continue to coordinate its construction plans for this area with the City of So St Paul.



City of
WEST SAINT PAUL

MUNICIPAL CENTER ■ 1616 HUMBOLDT AVE. ■ WEST SAINT PAUL, MINNESOTA 55118
PHONE: 455-9671 EMERGENCY: 455-9681

August 23, 1977

Mr. Merrith Linzie
Assistant District Engineer, Pre Design
3485 Hadley Avenue North
North Saint Paul, Minnesota 55109

RE: 319
FHWA-Mn-EIS-77-03-D
Draft Enviromental Impact Statement for
Interstate 494 in Hennepin and Dakota Counties
Minnesota Project I 494-4( )
State Projects 1985, 1986 and 2785
From: 24th Avenue in the City of Bloomington
To: Mississippi River Bridge in the City of
South Saint Paul

Dear Mr. Linzie:

A At the regular Council meeting of August 22, 1977, The West St. Paul City Council passed the following resolution: "Resolved the City Council of the City of West St. Paul unequivocably opposes any rerouting of Interstate 35 E traffic to Interstate 494 and Highway 3.

Sincerely yours,

Thomas A. Hoban
City Manager

TAH/bik

"WEST SAINT PAUL IS AN EQUAL OPPORTUNITY COMMUNITY"

RESPONSE TO CITY OF WEST ST. PAUL

A Please see A of Response to Inver Grove Heights, p 199.

City Of Lilydale On The Mississippi

901 SIBLEY MEMORIAL HIGHWAY / LILYDALE, MINNESOTA 55118 / PHONE 455-7681

Robert W. Lindquist — Mayor
John M. Thompson — Councilman
A. J. Leifert — Councilman
Lee Sutton, Jr. — Councilman
John M. Baker — Councilman

Clyde Nelson — Police Chief
Meth Welsch — Treasurer
Gertrude Person — Clerk
Val Anderson — Acting Clerk - Treas

September 27, 1977

District 9 - MN/DOT,
Division of Highways
3485 Hadley Avenue North
P.O. Box 2050
North St. Paul, Minnesota 55109

SUBJECT: Minnesota Project I-494
State Projects 1985, 1986, 2785

Gentlemen:

The City Council of Lilydale passed a resolution sometime back that 35E be completed as originally planned and that I-494 freeway and bridge along Alternate B-2 also be completed at the earliest possible date.

We want to go on record that our council voted as a body on this resolution to help alleviate the congestion on the Mendota Bridge and Highway 13 which affects our community directly. The completion of these routes would greatly reduce our accident rates, unnecessary pollution and go a long way to easing the loss of our natural resources.

Trusting that a favorable decision will be made on this project, we remain

Very truly yours,

CITY OF LILYDALE
R. W. Lindquist
R. W. Lindquist, Mayor

RWL:sf

CITY OF SHAKOPEE

INCORPORATED 1870

129 E. FIRST AVE. 55379

September 27, 1977

District 9 - MN/DOT, Division of Highways
3485 Hadley Avenue North
P.O. Box 2050
North St. Paul, Minnesota 55109

RE: Minnesota Project I-494
State Projects 1985, 1986, 2785

Dear Sir:

It is my understanding that you are currently considering the completion of I-494. On behalf of the City of Shakopee I would like to state our full agreement with the completion of this highway.

Although this highway does not run through Shakopee, it still affects Shakopee directly because it will be another step toward the completion of the highway system in the metropolitan area. Without a good highway system, the residents of Shakopee can not get where they need to and more importantly, businesses and industries located in Shakopee can not serve their customers throughout the metropolitan area. This highway will help in relieving current traffic tie ups on 35W and 13, both of which are essential to Shakopee.

I urge your prompt attention to completing our hgihway system.

Sincerely,

Walter C. Harbeck
Mayor
CITY OF SHAKOPEE

WCH/jsc

The Heart of Progress Valley
An Equal Opportunity Employer

APPENDICES

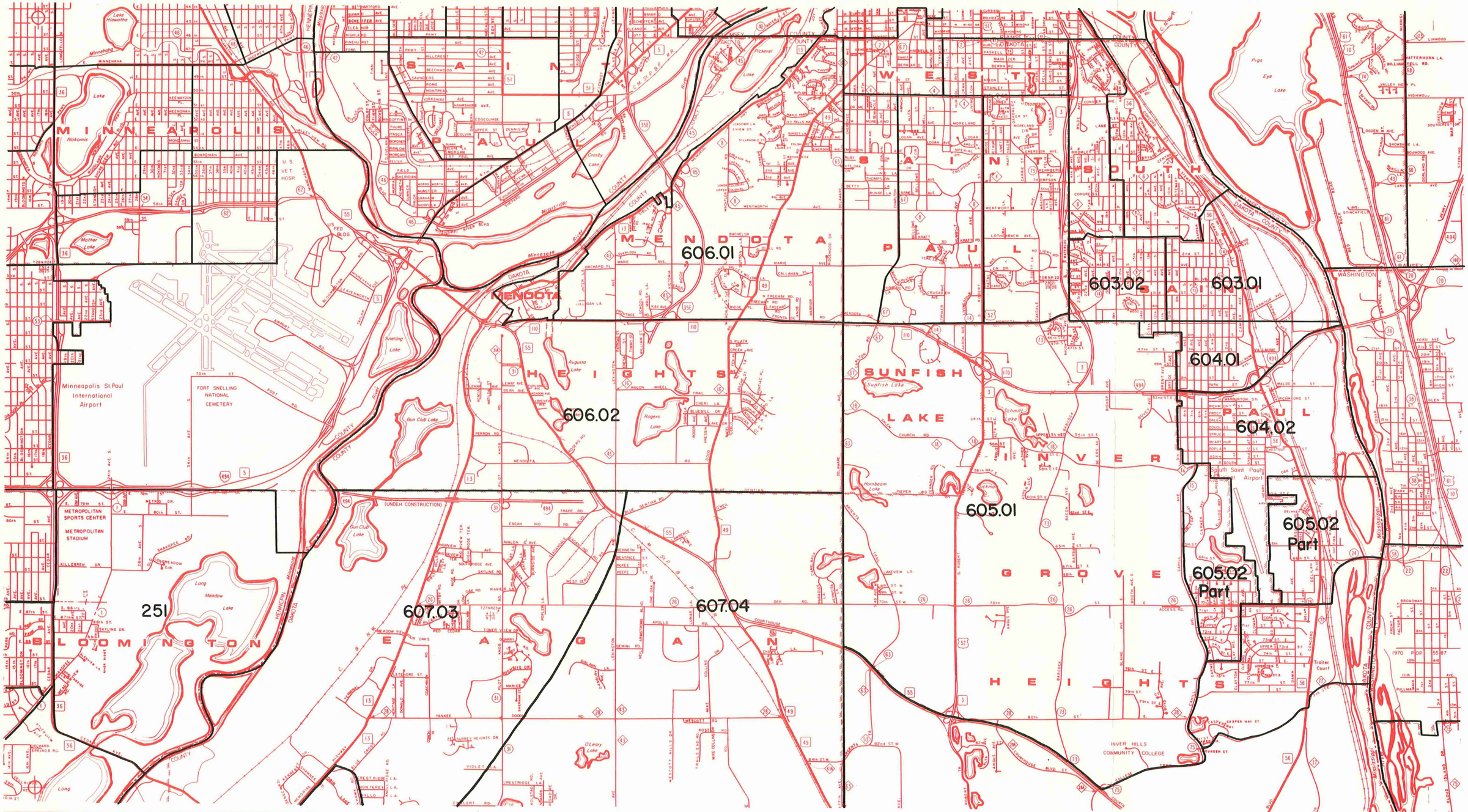
Census Tract Data And Map

Traffic Data

Table A-1

1970 CENSUS TRACTS DATA

CATEGORY	BLOOMINGTON	MENDOTA HEIGHTS		EAGAN		INVER GROVE HEIGHTS AND SUNFISH LAKE		SOUTH ST. PAUL				AVERAGE OF ALL DISTRICTS	DAKOTA COUNTY	HENNEPIN COUNTY	FIVE COUNTY AREA
	251	606.01	606.02	607.03	607.04	605.01	605.02	603.02	603.02	604.01	604.02				
AGE															
% People, Age 65 And Over	3.8	5.2	3.6	3.3	4.0	6.4	1.6	13.5	4.2	6.9	5.6	4.4	9.7	5.2	8.7
% People, Age 5 to 14	16.5	30.3	32.7	28.8	28.3	32.4	42.5	22.6	29.5	23.9	30.9	28.5	19.6	25.8	21.3
RACE															
% Negro	0.2	0.0	0.0	0.4	0.3	0.4	0.0	0.0	0.0	0.0	0.0	0.1	2.1	0.1	1.8
NATIVITY															
% Foreign Stock	13.4	16.2	15.1	15.4	11.1	12.0	6.8	24.6	14.4	21.6	11.8	13.8	19.4	12.8	17.7
EDUCATION															
Median Years of School Completed	12.7	12.8	12.7	12.7	12.5	12.4	12.5	10.9	12.4	12.0	12.1	12.4	12.5	12.5	12.4
% of Persons, Age 25 and Over, Who Are High School Graduates	75.3	79.6	75.0	75.7	69.9	64.0	71.4	42.8	67.0	49.8	54.5	69.7	67.9	68.0	66.1
RESIDENCE															
% of Persons, Age 5 And Over, Living in the Same House for the Last 5 Years	31.0	70.6	67.5	55.8	53.4	60.5	63.7	54.3	65.3	67.3	63.8	57.3	51.0	51.4	52.5
TRANSPORTATION															
% of Workers Using Private Automobiles	88.4	90.0	80.1	85.7	88.4	90.6	86.1	75.5	82.5	80.6	86.3	87.5	78.2	86.4	80.5
% of Workers Using Bus	0.7	6.6	5.2	1.2	0.7	0.4	7.0	8.9	10.2	10.7	7.0	4.2	10.6	3.5	8.9
% of Workers Using Other Means of Transportation	11.0	3.4	14.5	13.0	10.9	8.8	6.9	15.5	7.1	8.6	6.6	8.2	11.2	10.1	10.7
AUTO AVAILABILITY															
% of Households With No Automobile Available	2.1	1.6	1.1	2.9	1.6	5.8	1.4	24.1	6.5	13.1	6.5	4.6	16.9	6.0	14.2
% of Households With 2 or More Automobiles Available	52.4	64.8	64.7	66.5	65.7	51.8	39.1	24.2	41.7	37.0	36.4	53.0	37.8	48.6	38.7
OCCUPATION															
% White Collar Workers	61.2	67.7	64.2	66.5	49.8	51.7	49.8	39.7	58.7	41.6	44.1	55.5	59.2	54.8	56.7
% Blue Collar Workers	38.9	32.3	35.7	33.3	50.2	48.3	50.2	60.2	41.2	58.3	55.9	45.5	40.8	45.2	43.3
INCOME															
Median Family Income	$13,082.	$17,865.	$14,285.	$14,109.	$11,810.	$12,519.	$11,985.	$9.349.	$13,036.	$10,901.	$11.034.	$13,012.	$11,805.	$12,120.	$11,682.
% of Families With Income Less Than $4,000 A Year	5.8	2.1	3.7	3.6	4.3	5.9	4.8	13.4	6.7	7.2	8.4	5.1	8.5	5.5	8.0
% of Families With Income More Than $15,000 A Year	39.4	58.7	44.6	44.4	33.1	28.8	27.0	14.8	33.9	24.4	21.5	36.2	29.7	30.4	28.6
OWNER OCCUPIED HOUSING															
Median No. of Persons Per Dwelling Unit	2.4	3.8	4.0	3.8	3.9	3.8	4.4	2.8	3.8	3.2	3.8	3.7	2.5	3.5	2.8
% Owner Occupied	33.9	93.4	91.3	68.4	85.2	86.4	75.2	50.0	79.9	75.2	73.3	73.5	59.8	74.4	63.2
Median Value of All Specified Owner Units	$28,900.	$32,100.	$25,900.	$30,500.	$24,100.	$24,900.	$21,800.	$16,100.	$22,300.	$17,700.	$19,400.	$24,247.	$21,900.	$23,500.	$21,500.
% Over $25,000 In Value of All Specified Owner Units	64.8	70.2	53.6	68.0	44.7	49.7	20.2	6.5	34.4	6.0	11.5	40.4	35.6	42.8	32.8
RENTER OCCUPIED HOUSING															
Median Rent	$190.	$300.	$118.	$175.	$113.	$122.	$126.	$81.	$133.	$107.	$133.	$152.	$175.	$132.	$121.
AGE OF HOUSING UNIT															
% of Structures Built Since 1950	92.1	72.8	74.2	90.5	75.2	73.2	85.3	19.3	73.9	38.2	73.6	76.0	48.1	70.4	51.0
YEAR MOVED INTO UNIT															
% Moved into Unit Prior to 1950	2.7	11.7	9.4	0.0	0.0	11.6	5.1	21.3	9.7	23.5	11.1	7.8	11.9	10.4	12.2


MINNEAPOLIS
SAINT PAUL
WEST SAINT PAUL
SOUTH SAINT PAUL
MENDOTA HEIGHTS
SUNFISH LAKE
INVER GROVE HEIGHTS
BLOOMINGTON
EAGAN
606.01
606.02
603.02
603.01
604.01
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605.02 Part
607.03
607.04
251
Minneapolis St.Paul International Airport
FORT SNELLING NATIONAL CEMETERY
METROPOLITAN SPORTS CENTER
METROPOLITAN STADIUM
INVER HILLS COMMUNITY COLLEGE
(UNDER CONSTRUCTION)
Lake Hiawatha
Minnehaha Creek
Lake Nokomis
Mother Lake
Snelling Lake
Gun Club Lake
Augusta Lake
Rogers Lake
Crosby Lake
Pickerel Lake
Long Meadow Lake
O'Leary Lake
Schmitt Lake
Sunfish Lake
Hornbeam Lake
Pigs Eye Lake
Mississippi River
Minnesota River
Dakota County
Washington County
U.S. VET. HOSP.
U.S. FED BLDG
Trailer Court
CENSUS TRACT MAP
N
0 2000 4000
INTERSTATE 494

FIGURE A-1

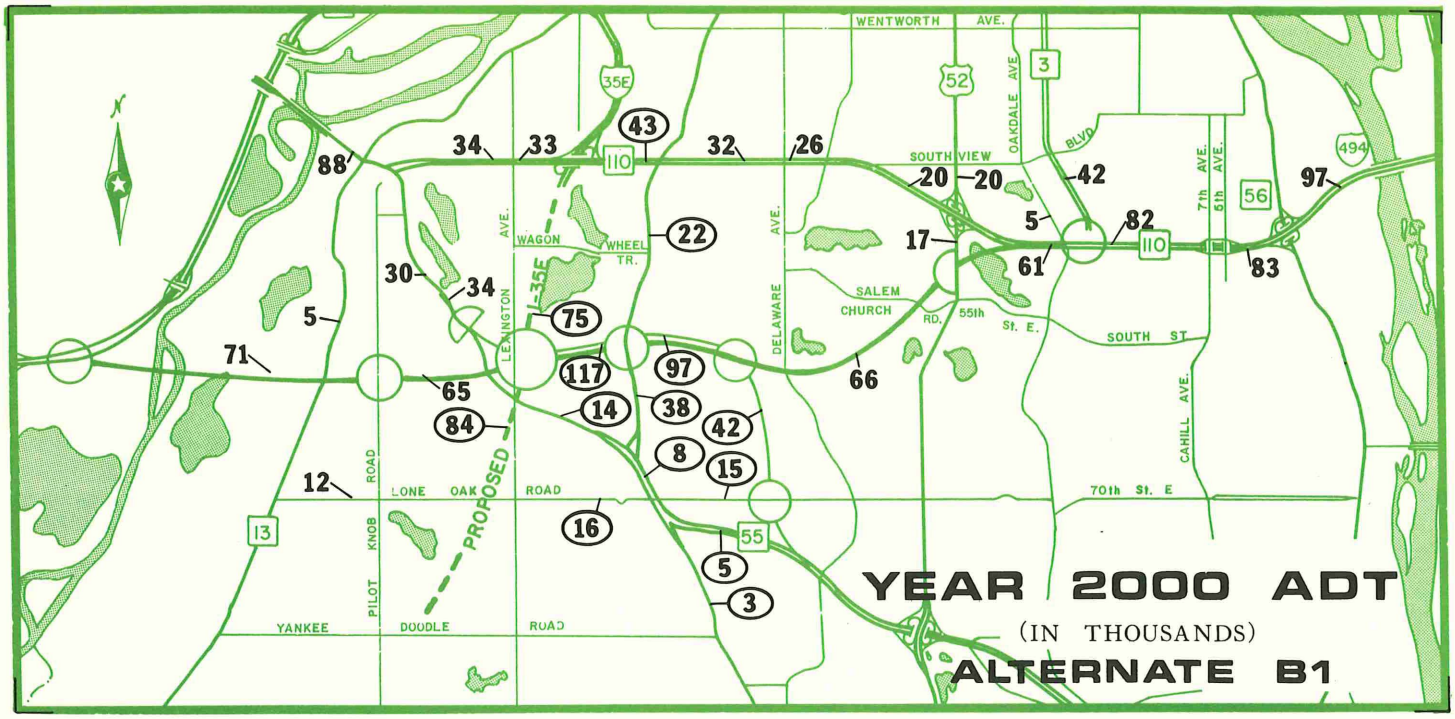

FIGURE A-2

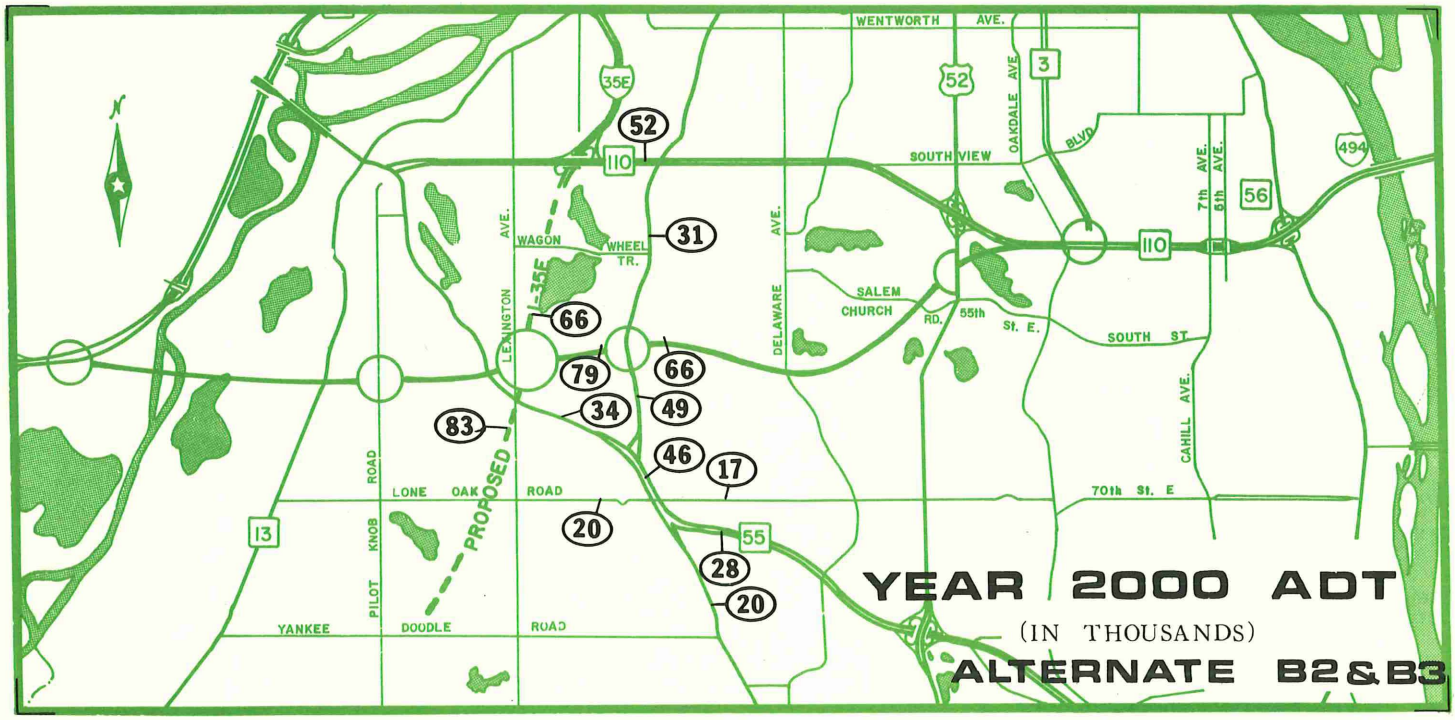

FIGURE A-3

(00) indicates areas where Alternate B2 volumes are different from Alternate B1 volumes. Other volumes (indicated by numbers only on Alternate B1) are the same for both alternates.

TABLE A-2
ALTERNATE PREFERENCES
(Received at hearing and during comment period.)

ALTERNATE PREFERENCE	GOVERNMENT AND AGENCIES	BUSINESSES AND ORGANIZATIONS	CITIZENS	TOTALS
No Build	1		18	19
A Corridor			6	6
B Corridor (No Design Preference)	10	29	163	202
*B Corridor (Modified Design)		1	41	42
B1 Design		1	15	16
B2 Design	4	49	104	157
B3 Design	1		7	8
C Corridor			1	1
Corridor Further South			8	8
Total Responses	16	80	363	459

TABLE A-3
AREA POPULATION, EMPLOYMENT AND HOUSEHOLD PROJECTION
(Figures used in DEIS, prior to 1977 forecasts)

LOCATION	POPULATION PROJECTIONS			EMPLOYMENT PROJECTIONS			HOUSEHOLD PROJECTIONS		
	1980	1990	2000	1980	1990	2000	1980	1990	2000
Bloomington	89,200	93,000	92,500	57,200	65,800	76,800	26,450	30,250	32,350
Airport	838	884	939	22,265	12,351	15,554	106*	106*	106*
Eagan	28,900	52,200	75,200	15,800	25,800	32,500	8,400	17,350	25,300
Mendota Heights	9,700	14,500	21,100	4,300	6,800	9,800	2,730	4,800	7,500
Sunfish Lake	550	1,100	1,700	80	150	200	200	400	600
Inver Grove Heights	22,650	39,700	53,500	6,420	10,350	20,300	6,100	12,400	17,900
South St. Paul	24,900	24,000	23,350	10,350	12,050	13,000	8,200	8,600	8,600
Minneapolis	421,000	432,600	441,900	305,500	322,000	333,500	173,600	183,600	188,250
St. Paul	298,100	304,700	312,700	199,500	213,500	221,500	113,100	119,300	123,300
Metropolitan Area	2,195,000	2,560,000	2,888,000	1,086,000	1,322,000	1,586,000	731,500	904,500	1,050,000

* Airport projections are for dwelling units

Source: Metropolitan Council, December 1975.

TABLE A-4
STATE NOISE-LEVEL STANDARDS (MPCA)

Classification	Land Use	Daytime Noise Level (7 AM to 10 PM)		Nighttime Noise Level (10 PM to 7 AM)	
		L_{10}	L_{50}	L_{10}	L_{50}
NAC-1	Residential	65 dBA	60 dBA	55 dBA	50 dBA
NAC-2	Commercial	70 dBA	65 dBA	70 dBA	65 dBA
NAC-3	Industrial	80 dBA	75 dBA	80 dBA	75 dBA
NAC-4	Vacant Land	No Standard		No Standard	

Note: Additional information and analysis of state noise standards is available in a supplemental document distributed to the Minnesota Environmental Quality Board.

DEPARTMENT OF TRANSPORTATION

FEDERAL HIGHWAY ADMINISTRATION

FINAL

SECTION 4(f)

STATEMENT

FOR INTERSTATE 494

FROM 24th AVE. IN BLOOMINGTON TO THE MISSISSIPPI

RIVER BRIDGE IN SOUTH ST. PAUL

PREPARED BY

DEPARTMENT OF TRANSPORTATION

STATE OF MINNESOTA

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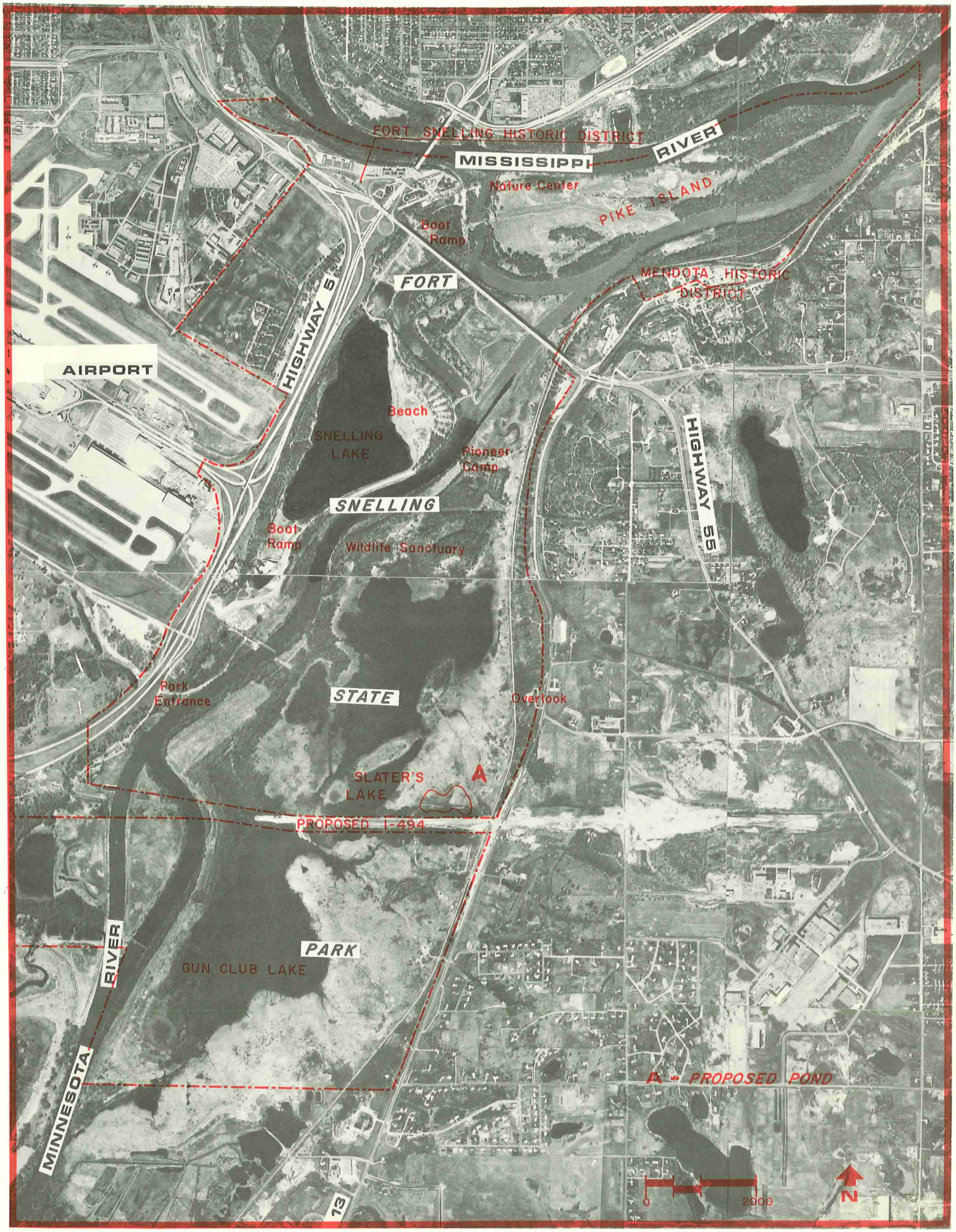

FORT SNELLING HISTORIC DISTRICT
MISSISSIPPI RIVER
Nature Center
PIKE ISLAND
Boat Ramp
FORT
MENDOTA HISTORIC DISTRICT
HIGHWAY 5
AIRPORT
Beach
SNELLING LAKE
Pioneer Camp
HIGHWAY 55
SNELLING
Boat Ramp
Wildlife Sanctuary
Park Entrance
STATE
Overlook
SLATER'S LAKE
A
PROPOSED I-494
PARK
GUN CLUB LAKE
RIVER
MINNESOTA
A = PROPOSED POND
0
2000
N
13

FIGURE 1

INTRODUCTION

THE PROPOSED HIGHWAY IMPROVEMENT

The Federal Highway Administration and the Minnesota Department of Transportation, Division of Highways (DH), proposes the construction of a 10.2 mile section of Interstate (I) 494. The proposed section of highway will complete the I-494 and I-694 beltline route that extends around the metropolitan area of St Paul and Minneapolis. A six-lane highway, it will be located near the southern border of St Paul and Minneapolis and will pass through the cities of Bloomington, Eagan, Mendota Heights, Sunfish Lake, and So St Paul. Termini for the proposed highway will be 24th Av in Bloomington and the Mississippi River Bridge in So St Paul.

The DEIS for proposed I-494 considered three design alternates — Alts B1, B2, and B3 — and the No-Build. In addition, the DEIS discussed a historic alternate, Alternate A. Alternate B1 included the proposed section of I-494, a relocated section of TH 55, and improvements on existing TH's 5, 55, 49; and inplace I-494 in So St Paul (constructed in 1962). Alternate B2 was in essence a staging of Alt B1. Under Alt B2, all the highway improvements of Alt B1 would have been made, with the exception of the relocated section of TH 55. The Alt B2 design would have allowed for the addition of TH 55, but the actual construction would not have occurred until the need developed. Alternate B3 excluded the relocated section of TH 55 and any provision for its construction. It included all the other improvements of Alt B1.

The Selected Alternate

All three design alternates considered fell within the Preferred Corridor, the only corridor location considered a viable location for the proposed section of highway (because of the strong historical commitment to the corridor[1] and the current development patterns in the project area). Subsequent to the evaluation of the comments received on the DEIS and the public hearing, Alt B3 was selected for the following reasons: (1) It impacts 21 less acres of wetland and removes 185 less acres of undeveloped land, six less residences, and one less farmstead than Alts B1 and B2, (2) new — and lower — traffic forecasts indicate that the lesser design of Alt B3 (mainly the exclusion of the relocated section of TH 55) would be adequate, and (3) Alt B3 is consistent with the transportation plan of the Metropolitan Council, Regional A-95 Clearinghouse.

NEED: BASES FOR THE PROPOSED ACTION

The beltline route allows through traffic from I-94 and I-35 to skirt the Minneapolis and St Paul Central Business Districts and the residential streets of the core metropolitan area. Also, the route carries traffic to the high activity centers and suburban residential areas along the periphery of the metropolitan area. In the project area, three highways serve as the link between the completed sections of I-494. Portions of this link are operating at capacity with frequent delays and unstable traffic flows. Also, the accident rates on the approach to the Mendota Bridge consistently ranks among the highest in the metropolitan area.

[1] Hearings on the project date back to 1958.

[2] The designated planning coordinator, A-95 Clearinghouse, and 3C Planning Agency for the St Paul-Minneapolis metropolitan region.

The proposed section of I-494 will replace this link and provide mobility for regional, state, and interstate traffic. It will also serve a number of existing and planned major facilities in the project area. Some of the important existing local development which the proposed highway will serve aree as follows:

The Minneapolis-St Paul International Airport
The Metropolitan Sports Complex
The Fort Snelling State Park
Large Industrial Parks in Bloomington, Eagan, and Mendota Heights
The So St Paul Stockyards (terminal market point for 20 states)

The concentration of industries and businesses in the project area combine to make it one of the major traffic generators in the State. Currently, about 60,000 persons work in the project area and nearby surrounding communities. A large number of companies in the project area have extensive shipping and receiving operations. The So St Paul Stockyards, for example, handled over 300,000 trucks in 1974, more than any other single location in Minnesota. Truck traffic from the remaining major industries in the project area (some 40 in the Eagandale Industrial Park alone) adds significantly to this total.

Development planned for the project area will mean a considerable increase in vehicular trips. Planned development includes major expansion of one of the industrial parks, the Eagandale Center, located in Eagan. Currently, about 1200 fo the park's 2700 acres are developed. Substantial commercial development is also proposed for the Eagandale area. Currently, about 3000 persons work in the industrial park. Once the park is fully developed and the nearby commercial development occurs, from 25,000 to 30,000 persons will work in the general area. Other planned development in the project area includes major expansion of the International Airport and improvements in Fort Snelling State Park.

The MC has endorsed the completion of I-494 as being consistent with comprehensive planning in the metropolitan area. Proposed I-494 is also a feature of the land use plans of all the cities in the project area. The cities indicate a definite correlation between their development plans and proposed I-494, indicating varying degrees of dependence on the highway.

4(F) AND 6(F) INVOLVEMENT

PROPOSED POND IN FORT SNELLING STATE PARK

The proposed section of I-494 will require 18 acres of land for a pond and spillway in Fort Snelling State Park, located in the Minnesota River Valley just south of St Paul and Minneapolis, MN (Fig 1). (All of the design alternates would have required the ponding area). Designed to serve as a sedimentation basin, the proposed pond is one of many that the Division of Highway's (DH) Hydraulic Section developed as part of a Drainage Plan for Proposed I-494. (Ponds serving other drainage areas are located elsewhere along the proposed route). The proposed pond will constitute a 4(f) and a 6(f) involvement.

(A 4[f] involvement occurs when a project requires the use of any land from a historic site or publicly owned land from a park, recreation area, or wildlife and waterfowl refuge of national, state or local significance. A 6[f] involvement occurs when the impacted area has used Land and Water Conservation Funds — LAWCON — in its development as is the case in Fort Snelling State Park.)

Proposed I-494 will pass through the park on land which the Division of Highways (DH) acquired in 1966 in a joint acquisition with the Minnesota Department of Conservations,[3] (DOC). Back in the early 1960's, when the DH was considering acquiring land in the Minnesota River Valley for the proposed I-494 crossing, the DOC wanted additional parkland in the Minnesota River Valley in the vicinity of the proposed I-494 crossing. Part of the property which the DOC wanted could only be obtained through condemnation proceedings. The DOC (along with the Minnesota Department of Administration) entered into an agreement with the DH to jointly acquire 465 acres, with the DH exercising its power of eminent domain.[4]

Of the 465 acres acquired, the DH retained 16 acres — enough for the I-494 crossing. The DH did not retain the land needed for the proposed pond because preliminary plans were not sufficiently developed at the time of the joint acquisitions. Thus, drainage and other detailed construction requirements were not known.

The DH transferred the remaining 449 acres to the DOC (with reimbursement from the DOC). This land is now part of Fort Snelling State Park and is under the jurisdiction of the Department of Natural Resources (DNR). Figures 2 and 3, p 220, show the proposed location of the pond.

[3] Now the Minnesota Department of Natural Resources

[4] The right of a government to take, or to authorize the taking of, private property for public use, with just compensation being given to the owner.

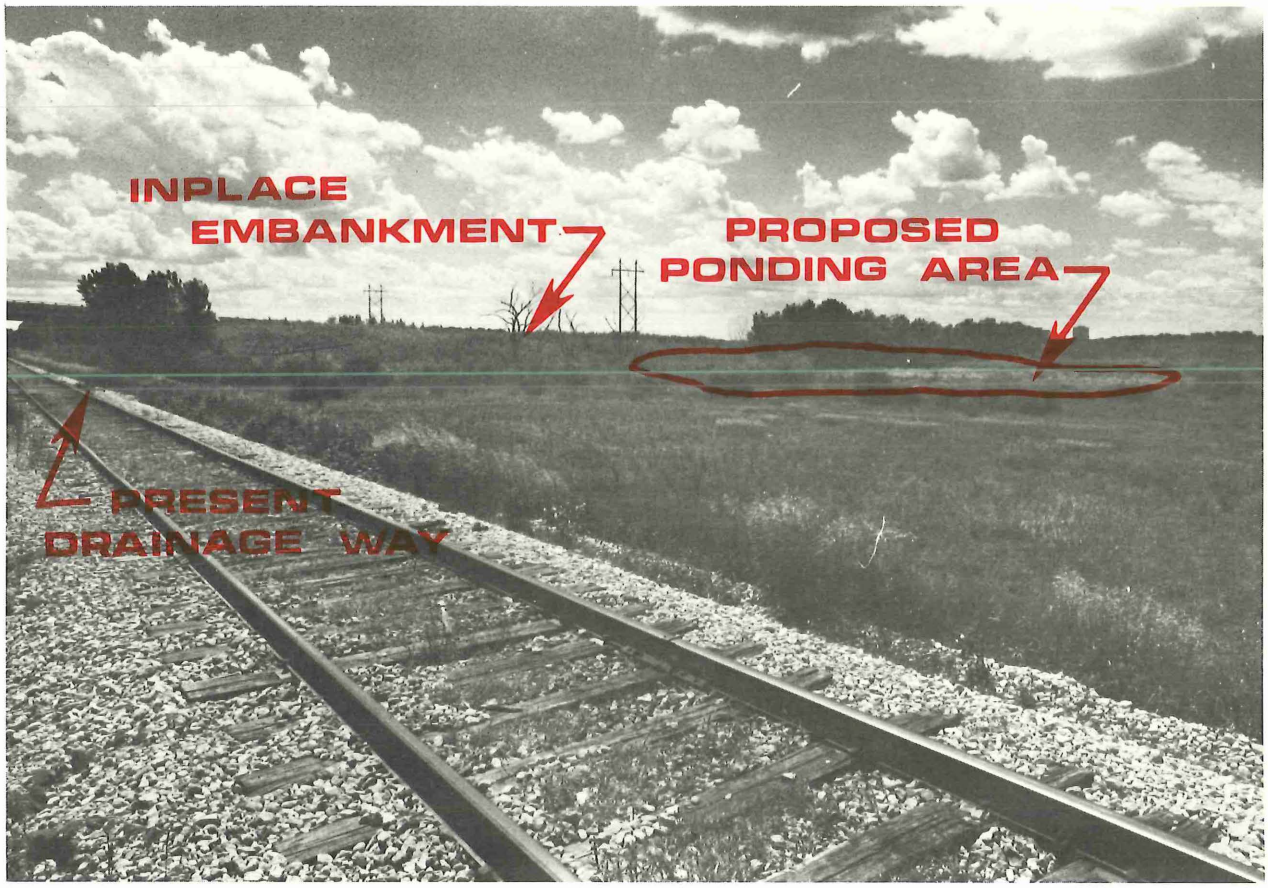
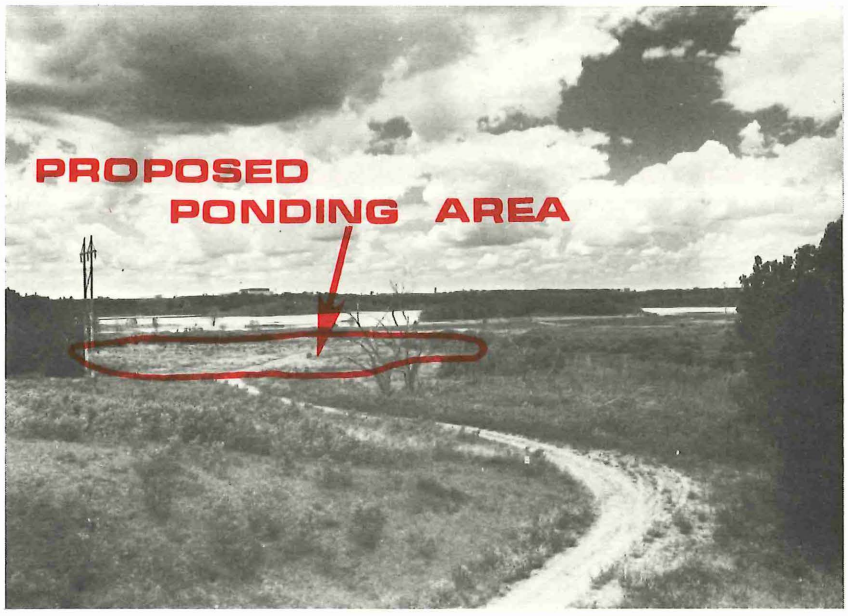


FIGURE 2

Showing ponding area, inplace roadway embankment, and existing drainage culvert.

FIGURE 3



Showing ponding area.

FORT SNELLING STATE PARK

CHARACTER AND USES OF PARK

Fort Snelling State Park encompasses about 2500 acres, extending from the confluence of the Minnesota River to about one mile south of the proposed I-494 crossing. Located within the park are several lakes and ponds and extensive areas of marshes and bogs. The Minnesota River also passes through the park. Some 220 species of birds, mammals, reptiles, and amphibians reside in the park or nearby areas. The Minnesota Department of Natural Resources (DNR) has designated two areas within the park as wildlife habitat (both about one mile north of the proposed ponding area).

The park also serves cultural and recreational uses. The major portions of the Fort Snelling and Mendota Historic Districts are within the park about two miles north of the ponding area. Both Historic Districts have a number of sites important to Minnesota's History. For recreational uses, the park contains a swimming and picnic area (at Snelling Lake) and an extensive trail system.

The swimming and picnic area is on the opposite side of the river about 1.5 miles north of the proposed ponding area. Activities in the vicinity of the pond will be restricted to those that the trail system will allow. (The DNR and Division of Highways coordinated planning for the proposed I-494 crossing and that portion of the trail in the vicinity. Alignment of the trail will allow it to pass under the proposed I-494 river bridge.)

ATTENDANCE AND ACCESS

In 1975, attendance at the park totalled about 600,000. Park officials estimate that by 1980 attendance will be nearly 2 million annually. Access to the park is almost exclusively vehicular. The main entrance is located off of TH 5, just north of the proposed I-494 and TH 5 interchange (across the river valley from the ponding site).

The I-494 beltline route is the only major east-west highway leading to the park. Currently, the portion of the highway leading from the east to the park entrance include the TH 5-Mendota Bridge-TH 110 link. Forecasts for this link indicates extremely congested conditions by the year 2000 if I-494 is not constructed. The proposed section of I-494 will provide a direct access to the main entrance of the park enabling traffic from the east to avoid the current link. The DNR is planning an additional entrance to the park off TH 13, south of proposed I-494.

DEVELOPMENT IN THE PARK

Almost all of Fort Snelling State Park falls in the flood plain. Because of the high water table, the poor drainage and frequency of flooding,[5] and the extensive marsh areas and bogs in the flood plain, development in the park is severely restricted.

[5] From 1951 to 1971, the Minnesota River and adjacent lakes flooded over 16 times.

THE PROPOSED POND

LOCATION

Originally, Mn DOT had planned to locate the pond north of I-494. During the preparation of the DEIS, Mn DOT agreed to a request from DNR to locate the pond south of I-494. The DNR wanted to share the pond for the runoff from a trail center it had planned to construct in the area. Subsequent to the circulation of the DEIS, the DNR informed Mn DOT of their decision to move the trail center near TH 36, about 2.5 miles south of the I-494 crossing.

Since the pond is no longer needed for runoff from the trail center, the location north of I-494 (Fig 1) is more suitable for proposed I-494's drainage plan. The proposed drainage plan maintains current drainage patterns. Currently, the runoff from a section of Eagan's industrial area and TH 13 enters the floodplain just north of I-494. If the pond were located south of I-494, a drainage pipe would have to be placed through the inplace roadbed and embankment (placed in 1973). The extensive excavation required to place the pipe would mean additional impacts in the floodplain, since the fill has become stabilized and the embankment naturalized with vegetation.

DESCRIPTION

Interstate 494's 4(f) and 6(f) involvement with the park — the settling pond and spillway — will require about 18 acres. At present, plans are to have two 60" buried pipes carry the runoff to the pond. A concrete weir will control the outflow, trapping floating debris and allowing for periodic maintenance. The runoff will flow from the weir through a buried pipe and open ditch to Gun Club Lake. From Gun Club Lake, the runoff will move through a natural channel to the Minnesota River.

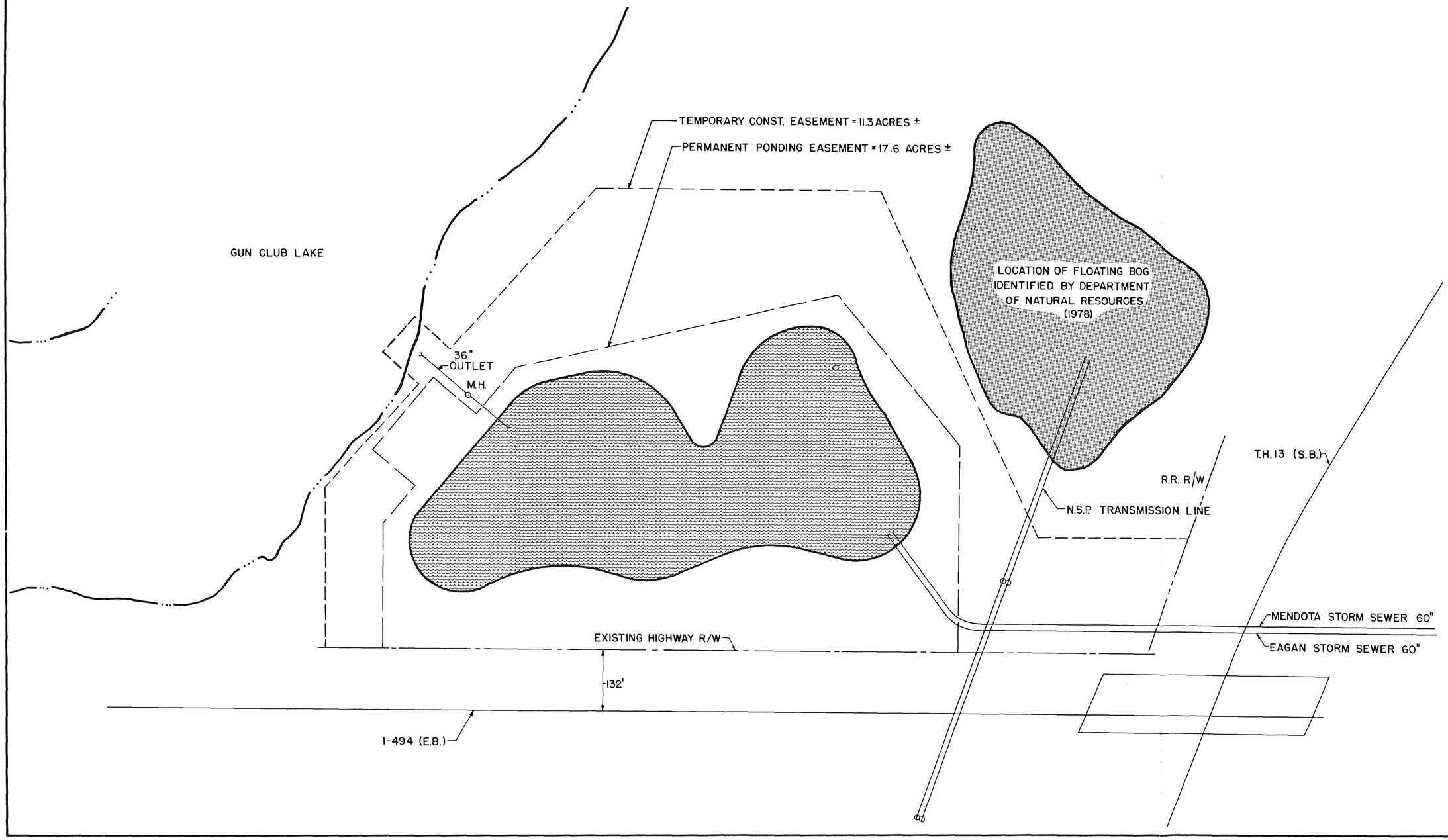
OWNERSHIP AND MAINTENANCE

The Minnesota Department of Natural Resources (DNR) will retain ownership of the 18-acre ponding area. Mn DOT will obtain from the DNR a permanent easement for the ponding area and a temporary construction easement for an additional 12 acres. Under a maintenance agreement, Mn DOT will dredge the pond to remove sedimentation and perform skimming for floating debris, when necessary. Also, Mn DOT will establish a program for monitoring the water quality of the pond.

The DNR must retain ownership of the land because Minnesota Statute 1976, Chapter 85.012, prevents the sale of land dedicated to park use. This statute states, in part, that the land in a State park ". . .shall be perpetually dedicated to such use." This restriction and the 6(f) replacement-land requirement (discussion on p 230) are the only title restrictions on the land.

RELATIONSHIP TO SIMILARLY USED LAND

The location proposed for the pond is in a marsh area. Aside from Snelling and Gun Club Lakes and the Minnesota River, most of the 2500 acres of the park consist of similar marsh areas (see Fig 1 , p 216).



PROPOSED SEDIMENTATION BASIN

N

0 50 100 200

INTERSTATE 494

FIGURE 4

SPECIAL CONSIDERATIONS

The proposed pond will also serve as the sedimentation basin for the runoff from the nearby industrial area in Eagan. Currently, runoff from a portion of this area enters the floodplain without any ponding. Under the proposed drainage plan for I-494, this runoff would flow into the highway drainage system and into the proposed pond.

In addition to being used as a sedimentation basin, the pond should be valuable as habitat for waterfowl, once the new vegetation around its perimeter becomes established. (See Mitigation Measures, p 230.)

ALTERNATIVE TO USE OF 4(F) LANDS

DIRECT RIVER OUTLET

The DH considered an alternative plan for outletting the drainage into the flood plain. This plan would carry the drainage along proposed I-494 within the highway right-of-way and outlet it directly into the Minnesota River.

This alternate plan is undesirable for two reasons: First, placing the pipe would mean disrupting about 4,000 ft of roadway embankment. The embankment, placed in 1972, has become completely stabilized and naturalized. Much of the habitat area lost to small wildlife when the roadway embankment was first placed has been restored. Re-excavation would mean distrubing the vegetation and fill and possibly introducing silt into the flood plain. Second, this method of getting the runoff to the river would not have the advantage of allowing a final ponding of the runoff prior to discharging it into the Minnesota River. The proposed settling pond would allow a periodic skimming for debris and oil prior to the runoff moving into the Minnesota River. The Minnesota Department of Natural Resources (DNR) considers this pond a necessity and may not issue construction permits without its inclusion.

A SEDIMENTATION POND EAST OF TH 13

Most of the terrain immediately east of TH 13 is hilly and would not be suitable for constructing a pond of the size needed (see Figure 5 , p 226). The only site in this area suitable for constructing a final sedimentation pond is at a gravel pit, located about 1000 ft east of TH 13 (see Figure 1, p 216) and just south of proposed I-494. Located in this general area are several residences and a country club.

This area is considerably higher than TH 13. A pond here would require extensive damming. With the potential for failure with dams, this could be unsafe for the nearby development and TH 13. Also, because the potential for extensive flood damage would be greater in this area, a pond here would have to be a flood-retention pond and, consequently, would have to be much larger than the one currently proposed.

FIGURE 5

Looking south along TH 13. I-494 bridge over TH 13 (constructed 1973) in the center background. Ponding area is in the right background. At the left is part of the hilly area east of TH 13.

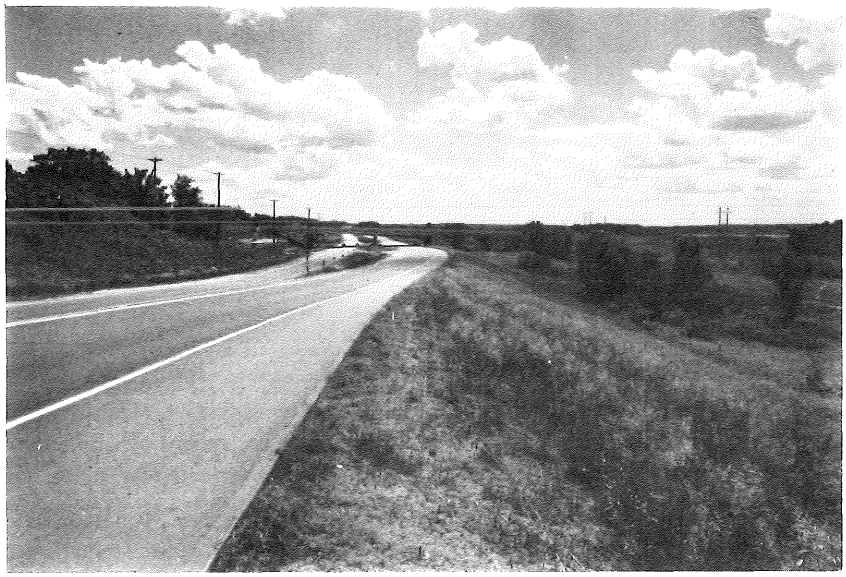


FIGURE 6

Looking toward the hilly area east of TH 13 from north of the I-494 embankment (placed in 1973).

Although this pond would be in a suitable location for receiving the runoff from the Eagandale Industrial Park and a section of I-494, runoff from the industrial park in Mendota Heights and TH 13 north of I-494 would continue to be discharged into the flood plain without retention. The outlets for the drainage from the industrial park in Mendota Heights and TH 13 are about 40 feet below the gravel pit site. Also the runoff from about ¾ of a mile of I-494 could not be ponded. Currently, plans are to bring the drainage from the industrial parks, the Mendota Bridge Intersection, TH 13, and a section of proposed I-494 into the proposed sedimentation pond in Fort Snelling State Park. This pond will be at a low enough elevation to receive the runoff from all the drainage areas.

Also, if the proposed pond were located east of TH 13, a buried pipe would still be needed to carry the runoff from the pond to the river. Placing a pipe within the highway right-of-way to avoid any disruption to the park would result in the impacts noted in "Direct River Outlet" above.

Using other planned settling ponds instead of constructing a sedimentation pond at the outlet would not serve the desired function. Other planned settling ponds are located too far from the proposed system outlet to provide retention for all the highway runoff. Substantial amounts would enter the flood plain without any retention at all.

ALIGNMENT CHANGE

An alignment change to avoid passing through the park is not feasible and prudent. The park stretches nearly 4.7 miles north to south and proposed I-494 will cross it about 1 mile north of the south boundary. Moving the alignment to the north would increase the impact on Fort Snelling State Park since the entire right-of-way crossing in the Minnesota River Valley would require park land. A shift to the north would also impact the Minneapolis-St Paul International Airport and the Fort Snelling National Cemetery.

Shifting the crossing to the south to miss the park would mean serious impacts. This shift would impact about 45 acres of additional wetlands (the Minnesota River and the surrounding marsh land). Also, moving the alignment would result in an impact on the National Wildlife Refuge (See Figure 7, p 228). The US Fish and Wildlife Service is currently in the process of acquiring property within the established boundaries of the refuge.

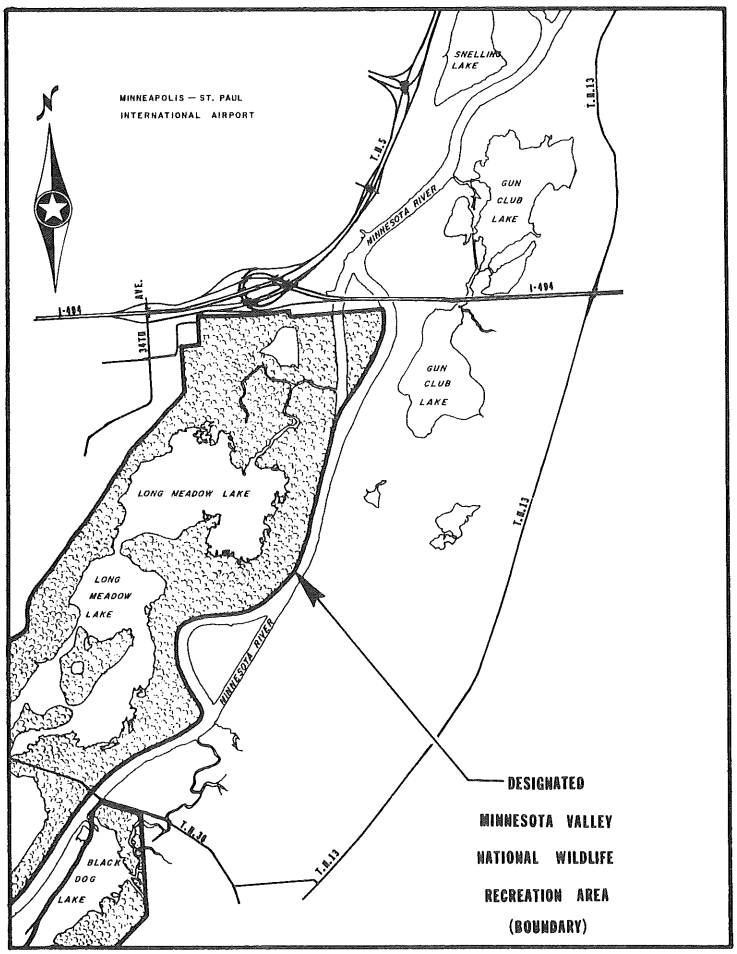
Shifting the alignment south would also impact two commercial and industrial parks — Apple Tree Square in Bloomington and the Eagandale Industrial Park in Eagan. Both of these are immediately south of the proposed alignment and are extensively developed. An alignment shift to the south would also impact a residential area in Eagan, an area between TH 13 and Pilot Knob Road, just south of the currently proposed I-494 alignment. (See Existing Land Use, Figure 8, p 235).

A shift to either the north or south would mean losing the $2.5 million invested in right-of-way acquisitions and construction work implemented under approvals made prior to the EIS process. The DH placed sand blankets east and west of the river and a roadway embankment east of the river to TH 13, completing the work in 1973. The sand blanket, which will serve as a support for construction equipment, is about 174 ft wide throughout, with an average depth of 10 ft. The roadway embankment is about 0.7 miles long. Shifting the alignment would mean reconstructing the sand blanket and roadway embankment.

The proposed I-494 alignment on both sides of the river is a result of years of planning. Hennepin and Dakota Counties and most all the local municipalities have planned for proposed I-494 along the selected corridor, which places the Minnesota River crossing at this location. The alignment is also consistent with the Metropolitan Council's Development Framework Guide. The DNR has also planned for the I-494 crossing at the currently proposed location, as indicated in its "Management Plan for Fort Snelling State Park."

FIGURE 7

Designated Minnesota Valley National Wildlife Recreation Area



NO BUILD

Adopting the No-Build would mean not constructing the proposed section of I-494. This doesn't mean that other proposed highway improvements wouldn't be made in the vicinity. Also, minor safety and capacity improvements might be made to existing highways such as TH 110. These would include (but would not be limited to) the addition of turning lanes, traffic signals, frontage roads, new surfaces and improved shoulders.

Deficiencies on the area highways would still exist because these improvements would not satisfy the traffic demands of this corridor which indicate the need for a 6-lane freeway.

Not constructing the pond is a choice only if I-494 is not constructed and the commercial-industrial development planned for the nearby areas in Eagan does not materilize. A sedimentation basin would be needed in this area for the runoff from this development in Eagan even if one was not needed for proposed I-494.

IMPACTS

DURING CONSTRUCTION

Construction of the pond will be subject to DNR permit. The DNR and the DH have discussed the construction of the proposed pond in several meetings and have determined that it should not result in any significant impact on the flood plain.

Moving construction equipment to the site of the proposed pond should not be a problem. An existing road leads from TH 13 into the area of the park where the proposed pond will be located. The DNR has used this road as a haul road in the past, and the DH will probably use it during the construction of the pond. The ground near the proposed pond is fairly stable and should not require any fill to support construction equipment. Should it develop that some areas will require fill for stability, the fill would be removed or allowed to remain inplace, whichever the DNR prefers.

The construction of the ponding area should not cause a significant increase in noise or air pollution. Noise from construction equipment will only be temporary and should not affect most park users, since the main activity center is about 1.5 miles north of proposed I-494. With the limited amount of construction equipment that will be used in the construction of the pond, the increase in air pollutants in the area will be minimal.

To avoid any impact on the water quality through erosion, excavated material will be contained in protected areas or removed from the floodway.* As a precautionary measure against contamination through spills, gasoline or oil will not be stored in the floodway.

LONG TERM

The long term impact of the proposed pond will be the improvement of the water quality, since the pond will also serve as a sedimentation basin for the runoff from the Eagan industrial area and a section of TH 13.Currently,this runoff enters the floodplain without any retention.

The 18 acres of pond will not be available for unlimited use by the park agency but will provide those uses appropriate for ponding area such as wildlife habitat and visual enjoyment.

* An elevation that the Minnesota Watershed District has established as 1 ft above the 100-year flood level.

MITIGATION MEASURES

LANDSCAPING

The DH will develop a landscape plan for a portion or all of the perimeter of the pond. Emphasis on landscaping will be on the south side, the side nearest proposed I-494 (at the DNR's request). Other areas may be allowed to revegetate naturally, so that the ponding area will blend with the rest of the flood plain. The pond will be close enough to a nearby trail to provide visual enjoyment for trail users.

DESIGN

The pond itself has been designed and located in cooperation with Minnesota Department of Natural Resources to avoid a nearby bog. The pond will have a curvilinear shoreline. To facilitate growth of emerging vegetation along the edges, the bottom of the pond will have a flat area below the normal water line.

The proposed pond, serving as a sedimentation basin, will allow longer periods of retention and permit additional settling out of sediments and periodic skimming for debris and oil. To help insure that the water leaving the pond meets local, state, and federal standards, the water in the pond will be monitored periodically.

Runoff from a nearby industrial area presently entering the park land without ponding can be diverted to the proposed pond prior to discharge to the park land.

REPLACEMENT LANDS

The State of Minnesota, through the Minnesota Department of Natural Resources (DNR), has requested approval for conversion of 18 acres from within the Statutory Boundaries of Fort Snelling State Park for use as ponding area by the Mn DOT. The DNR has guaranteed to the Heritage, Conservation and Recreation Service (HCRS) that the proposed replacement lands will be of at least equal fair market value and reasonable equivalent usefulness. The land value will be based on appropriate appraisals meeting HCRS, Mn DOT, and DNR standards. The HCRS has in their letter dated July 7, 1978 approved this request for conversion of 18 acres of park land, with the requirement that replacement lands be provided by December 31, 1979. In approving the conversion of the 18 acres, the HCRS also approved "The Amendment to the Project Agreement" which deletes the 18 acres from the original tract of land. (See letters from DNR and HCRS on pages 232 and 233).

The Mn DOT and DNR have agreed to this conversion and replacement, recognizing that Mn DOT will obtain permanent ponding easement over the 18 acre ponding area (DNR will retain fee title). The DNR will obtain fee title to the replacement lands. The DNR will provide Mn DOT with a temporary construction easement over the 18 acre ponding area. The DNR will obtain fee title to the replacement lands. The DNR will provide Mn DOT with a temporary construction easement over 12 acres adjacent to the permanent ponding easement and will provide access to Mn DOT for maintenance of the ponding area. Specific replacement lands will be identified as soon as possible and provided no later than December 31, 1979. Appraisals of replaced and replacement land will be completed upon identification of the lands to be utilized for replacement.

COORDINATION

Coordination of the planning for the ponding area included meetings, field-walks, and letter communications with the DNR (see letter on page 232), the US Fish and Wildlife Service, and the HCRS (see letter on page 233), and letter communications with the US Dept of Agriculture (see FEIS, page 134) and the US Dept of Housing and Urban Development. Plans for the proposed pond were generally acceptable. The DNR, jurisdictional agency for Fort

CONCLUSION

On the basis of the Drainage and related studies for proposed I-494, it is the opinion of the Federal Highway Administration, the DH, and the DNR that there is no feasible and prudent alternative to using the parkland for a ponding area. The proposed pond will allow additional retention of the highway runoff, permitting periodic maintenance and cleanup. Also, it will allow containment of the highway runoff in the event of an oil or chemical spill.

All possible planning to minimize harm has been included in this highway proposal.

May 25, 1978

Mr. John Cherry, Regional Director
Heritage Conservation and Recreation Service
Lake Central Region
Federal Building
Ann Arbor, Michigan 48107

Re: LW27-00253 - Fort Snelling State Park - 6(f) Conversion

Dear Mr. Cherry:

Since it has been determined that a Section 6(f) conflict will result from the construction of a Department of Transportation (DOT) settling pond within the statutory boundaries of Fort Snelling State Park, the Minnesota Department of Natural Resources requests approval for the conversion and substitution of replacement land of at least equal fair market value and of reasonably equivalent usefulness.

The action which is proposed is deemed necessary because of the pollution hazard caused by rain water runoff from the freeways and also by commercial industrial waste runoff which flows directly into the Mississippi River. The proposed settling pond will prevent these effluents from reaching the river.

The proposed conversion is in accord with the existing statewide comprehensive outdoor recreation plan.

Attached to this request is a map indicating the location of the Fund-assisted land (18 acres) that is proposed to be taken. The location of the proposed replacement land has not been determined.

The State guarantees that the proposed replacement lands will be of at least equal fair market value and of reasonably equivalent usefulness. The land values will be based upon appropriate appraisals meeting H.C.R.S. standards.

The conversion's impact on recreational values and experiences within the Fund assisted park will be beneficial. The settling pond is expected to remain relatively free of pollutants to the extent that it will provide wildlife habitat. This will be an opportunity for park visitors to observe wildlife nesting spots.

In the event that any serious spills occur in this area the settling pond will act as a catch basin and prevent the pollutants from contaminating the river. This proposal is the only feasible alternative to the potential hazards. If this proposal is not implemented, any serious spills would flow directly into the Mississippi River causing damage that for outweighs the damage that would be done to one localized area.

Upon approval, the DOT will supervise construction and maintain the repair of the site.

Attached to this request are five copies of an amendment to Fort Snelling State Park - Project LW27-00253, and two copies of form Federal 424.

Thank you for your consideration.

Sincerely,

J Kuehn
by G Johnson

Jerome H. Kuehn
Acting Assistant Commissioner

United States Department of the Interior

HERITAGE CONSERVATION AND RECREATION SERVICE
LAKE CENTRAL REGION
ANN ARBOR, MICHIGAN 48107

IN REPLY REFER TO:

G26 Minnesota
27 - 00253, 317, 404
27 - 00542, 711, 748

July 7, 1978

Mr. Jerome H. Kuehn
Acting Assistant Commissioner for Planning
301 Centennial Building, Box 11
St. Paul, Minnesota 55155

Dear Mr. Kuehn:

Your request for conversion of 18 acres of parkland in Fort Snelling State Park to construct a settling pond in conjunction with construction on highway I-494 has been approved.

We have also approved amendment #1 to project 27 - 00253, Fort Snelling State Park, to reduce the project scope by 18 acres and replace the converted land with land of equal fair market value and reasonably equivalent usefulness by December 31, 1979.

Fair market value of the converted land and the land proposed as replacement must be established by appraisal at the time of replacement.

Replacement land should be provided as soon as possible but no later than December 31, 1979.

Sincerely yours,

John D. Cherry
Regional Director

UNITED STATES
DEPARTMENT OF THE INTERIOR
Bureau of Outdoor Recreation

State **Minnesota**

Project Amendment No. **LW27-00253.1**

AMENDMENT TO PROJECT AGREEMENT

THIS AMENDMENT TO Project Agreement No **27-00253.1** is hereby made and agreed upon by the United States of America, acting through the Director of the Bureau of Outdoor Recreation and by the State of **Minnesota**, pursuant to the Land and Water Conservation Fund Act of 1965, 78 Stat. 897 (1964).

The State and the United States, in mutual consideration of the promises made herein and in the agreement of which this is an amendment, do promise as follows:

That the above-mentioned agreement is amended by adding the following:

Scope of the project is reduced by 18 acres to be replaced by land of equal fair market value and of the same reasonable usefulness on or before 12-31-79.

ANY REFERENCE TO THE BUREAU OF OUTDOOR RECREATION (BOR) CONTAINED IN THE AGREEMENT, OR IN ANY ATTACHMENTS INCORPORATED THERETO, SHALL HEREINAFTER BE CONSIDERED A REFERENCE TO THE HERITAGE CONSERVATION AND RECREATION SERVICE (HCRS).

27-037-0000
MN-Dakota-N/A

In all other respects the agreement of which this is an amendment, and the plans and specifications relevant thereto, shall remain in full force and effect. In witness whereof the parties hereto have executed this amendment as of the date entered below.

THE UNITED STATES OF AMERICA

By _____ (Signature)

Assistant Regional Director (Title)

Bureau of Outdoor Recreation
United States Department of the Interior

Date 7/7/78

Approved by _____
Don D. Davison, Director
Parks and Recreation

BOR 8-92a
(Rev. Mar. 1967)

STATE

Minnesota (State)

By _____ (Signature)

Jerome H. Kuehn (Name)

Acting Assistant Commissioner
Department of Natural Resources (Title)

WARREN SPANNAUS, Attorney General

APPROVED AS TO FORM AND EXECUTION

_____
Spec. Asst. Atty. Gen., Dept. of Natural Re...

6/5/78

RESIDENTIAL
COMMERCIAL
INDUSTRIAL
OPEN SPACE

EXISTING LAND USE

N

0 2000 4000

INTERSTATE 494

FIGURE 8