

DRAFT SCOPING DECISION DOCUMENT

SOUTHWEST BELTWAY PROJECT

**Future County State Aid Highway 84
Stearns County, Minnesota**

**Stearns County
Minnesota Department of Transportation
Federal Highway Administration**

November 2008

SRF No. 0076050

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1.0 INTRODUCTION

This Draft Scoping Decision Document (DSDD) has been prepared as part of the federal National Environmental Policy Act (NEPA) and state environmental review processes (Minnesota Environmental Policy Act, (MEPA) to fulfill requirements of 42 USC 4321 et. seq., 23 USC § 139, and Minnesota Rules Chapter 4410.2000. The DSDD is distributed to federal, state and local agencies and the public to provide an opportunity for review and comment prior to the preparation of a Scoping Document Decision (SDD). A 30-day comment period will begin when the availability notice for the DSDD is published in the Minnesota Environmental Quality Board (EQB) *Monitor*. A Scoping Meeting will be held during the 30-day comment period (as required by Minnesota Rules Chapter 4410.2100 Subpart 3), which will provide an opportunity for the public to comment on the DSDD.

A final scoping decision will be made by Stearns County, in consultation with the Minnesota Department of Transportation (Mn/DOT) and Federal Highway Administration (FHWA) after the public scoping meeting and at the end of the 30-day comment period. Following completion of the scoping process, an Environmental Impact Statement (EIS) will be prepared in accordance with the findings of the SDD.

This DSDD describes the purpose of and need for the proposed action; the process followed in the development and evaluation of alignment alternatives; the potential social, economic, and environmental impacts and discussion of the methodology that will be used to address each issue in the EIS.

2.0 PROJECT DESCRIPTION

The proposed action is the construction of a new minor arterial roadway connecting County State Aid Highway (CSAH) 4/CSAH 133 to Trunk Highway (TH) 15 within the southwest St. Cloud Metropolitan Area¹ in Stearns County, Minnesota (Southwest Beltway Project). The study area is bordered by CSAH 4 and CSAH 133 on the north, I-94 on the south, TH 15 on the east, and CR 121 and the existing City of St. Joseph municipal limits on the west.

The primary purpose of the Southwest Beltway Project is to identify a safe and efficient minor arterial transportation corridor within the southwest St. Cloud Metropolitan Area that can be preserved for future use in an area of planned growth that:

- Enhances mobility by providing a north-south arterial connection between CSAH 4/CSAH 133 and TH 23, and an east-west arterial connection between TH 23 and TH 15.
- Enhances connectivity to existing regional corridors (CSAH 133, CSAH 75, TH 23 and TH 15) within the west and southwest St. Cloud Metropolitan Area.
- Supports the economic and social needs for the growing west and southwest St. Cloud Metropolitan Area by providing infrastructure support and accessibility for the planned growth areas of the communities of St. Joseph and Waite Park.

¹ The St. Cloud Metropolitan Area consists of the cities of Sartell, Sauk Rapids, St. Cloud, St. Joseph, and Waite Park, as well as Haven, Le Sauk, Minden, St. Augusta, St. Joseph, St. Wendel, and Sauk Rapids townships (*St. Cloud Area Joint Planning District Plan*, May 2000). The southwest portion of the St. Cloud Metropolitan Area is defined as the cities of St. Joseph and Waite Park, and portions of St. Joseph Township northeast of I-94. See Section 3.0.

The objectives described above establish the basic transportation purpose of and need for the proposed project. The proposed project would also address other transportation objectives including providing adequate capacity to meet future transportation demand, accommodating other travel modes, and consistency with adopted plans.

The need to provide an arterial roadway within the southwest St. Cloud Metropolitan Area has been recognized since the 1980s. A corridor study completed in 2001 further examined the role of and need for an arterial roadway to serve future transportation demand within the southwest greater St. Cloud Metropolitan Area.

3.0 PROJECT COST, FUNDING SOURCE, AND SCHEDULE

Planning-level cost estimates for the Southwest Beltway project are described in the St. Cloud APO's 2030 Transportation Plan. These cost estimates assume construction costs of \$2 million per mile and right of way costs of \$1 million per mile. Engineering and construction administration cost estimates were assumed to be 20 percent of the project cost. This cost estimate does not include improvements associated with the crossing of the BNSF Railway lines near TH 23 and CSAH 75. Stearns County will work with BNSF Railway to determine the appropriate type of crossing (at-grade vs. grade-separated) during design and construction.

Planning-level cost estimates for the Southwest Beltway, as described in Exhibit 5I of the APO *2030 Transportation Plan*, are estimated at approximately \$24.5 million (2005 dollars).

The DEIS will include more detailed preliminary construction cost estimates for the alternatives to be evaluated in the DEIS (see Section 6.3).

Total project cost (construction; right of way; engineering) for the Southwest Beltway Project was estimated for future year of construction. These estimates were based on planning-level total project cost estimates developed as part of the St. Cloud APO *2030 Financial Plan Amendment*. An inflation factor of 2.05 was assumed when estimating future costs. The Southwest Beltway was divided into three segments for purposes of identifying future project costs as described below:

1. TH 15 to CR 137. This segment is identified as a fiscally-constrained project for the year 2024-2030 planning period. Total project cost for year 2027 construction (mid-year of planning period) is estimated at \$12.3 million (2027 dollars).
2. CR 137 to TH 23: This segment is identified as an illustrative project in the financial plan amendment (beyond 2030). Total project cost for construction beyond year 2030 is estimated at \$8.7 million (2030 dollars).
3. TH 23 to CSAH 133: This segment is also identified as an illustrative project in the APO financial plan amendment (beyond 2030). Total project cost for construction beyond year 2030 is estimated at \$29.3 million (2030 dollars).

No specific funding source has been identified for the Southwest Beltway Project at this time. Future funding for the project is anticipated from a combination of federal, state, and local funds. The specific contribution amount from each of these three funding sources has not been identified.

The following lists the anticipated schedule for completion of project activities:

Federal Notice of Intent	Fall 2007
Draft Scoping Decision Document	Fall 2008
Public Scoping Meetings	Winter 2009
Scoping Decision Document	Spring 2009
Draft EIS	2009 – 2010
Draft EIS Public Hearing	2010
Identification of Preferred Alternative	2010
Final EIS	2011
Stearns County Adequacy Determination	2012
FHWA Record of Decision (ROD)	2012
Corridor preservation	2012 – ongoing
Final Design and Construction	Dependent upon funding availability

4.0 RESPONSIBLE GOVERNMENTAL UNIT AND PROJECT MANAGER

The FHWA is the lead Federal agency under NEPA. Mn/DOT, as the direct recipient of Federal funds for the project, is a joint lead agency under NEPA. Stearns County, as project sponsor ultimately responsible for design and construction of the proposed project, and as the sub-recipient of Federal funds, is also a joint lead agency under NEPA.

Stearns County is the project proposer and Responsible Governmental Unit (RGU) under Minnesota Rules Chapter 4410.0500 for the purposes of this DSDD, and for the EIS, with respect to State environmental review requirements.

The contact persons for FHWA and Stearns County are listed below.

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5.0 ALTERNATIVES TO BE STUDIED IN THE DEIS

In addition to the No-Build Alternative, three Build alternative alignments are proposed to be studied in the DEIS. A final decision regarding the number of alternatives will be made based on input received from the public and agencies during the scoping period, and any additional studies to be completed on the impacts of the alternatives, if necessary. The alternatives currently proposed to be studied in the DEIS are described in the following sections and illustrated in Figure 1.

5.1 No-Build Alternative

The No-Build Alternative includes regional transportation improvements identified in the St. Cloud APO fiscally constrained network. The No-Build Alternative does not meet the transportation needs of the project. The No-Build Alternative does not provide a connection between CSAH 75, TH 23, and TH 15, and does not respond to the infrastructure needs in the planned growth area between St. Joseph and Waite Park. The No-Build Alternative will be carried forward into the DEIS as per NEPA and MEPA procedures as a baseline comparison for the other DEIS alternatives.

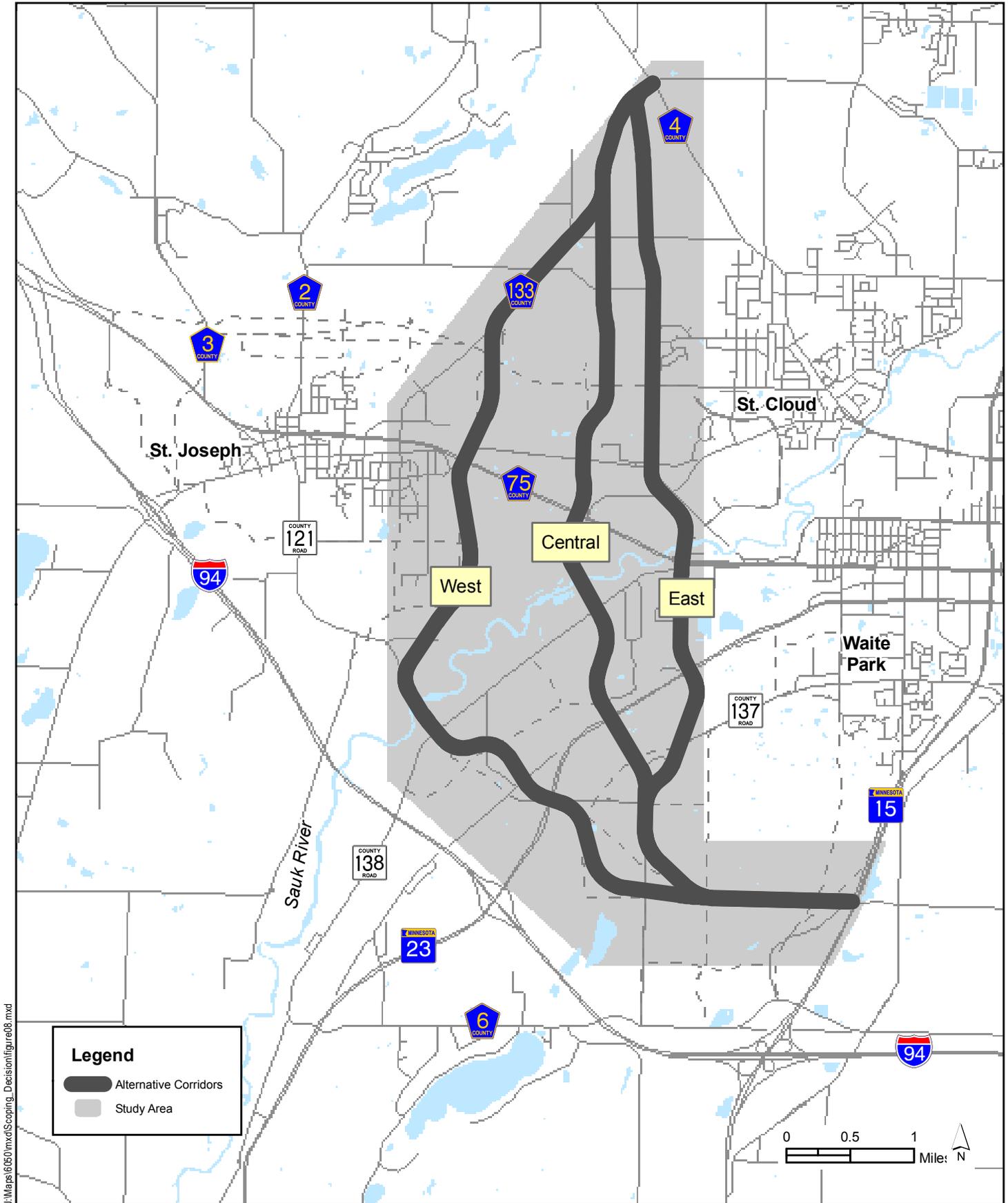
5.2 Build Alternative Alignments

The alternatives described below correspond to the alignments shown in Figure 1. These alignments represent efforts to identify corridors with unique characteristics that connect CSAH 75, TH 23 and TH 15, and attempt to avoid and minimize social, economic, environmental, and transportation system impacts with respect to known constraints in the study area.

It should be noted that the Build Alternative alignments (West, Central, and East Corridors) share a common segment between TH 23 and TH 15 south of Quarry Park. Just east of CR 137, the West Alternative continues to the west, whereas the Central and East Alternatives curve to the northwest. The Central and East Build Alternatives each utilize a segment of the existing CR 137 roadway in the City of Waite Park.

5.2.1 West Corridor Alternative

The West Corridor Alternative is located in the western portion of the study area closest to the City of St. Joseph. The north-south alignment of the West Corridor Alternative ties in to the existing CSAH 133 alignment in northeast St. Joseph. The West Corridor extends south of CSAH 133 parallel to the St. Joseph 20th Avenue corridor, and crosses CSAH 75 near the 88th Avenue/Ridgewood Road intersection. The north-south alignment of West Corridor Alternative would utilize the existing CR 121 river crossing over the Sauk River.



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Build Alternatives to be Analyzed in DEIS

Southwest Beltway Draft Scoping Decision Document
 SP 73-684-03
 Stearns County

Figure 1

The West Corridor Alternative east-west alignment between TH 23 and TH 15 would cross TH 23 at Bel Claire Road, approximately one mile northeast of I-94. The West Corridor Alternative would terminate at a future TH 15/33rd Street South interchange.

Several design elements are under consideration for West Corridor Alternative. These design elements would be discussed at the start of the EIS process as part of design and traffic engineering studies. These design elements include:

- Use of the existing CR 121 bridge over the Sauk River (i.e., no bridge reconstruction) versus reconstruction of this existing bridge with the West Corridor Alternative;
- Construction using the St. Joseph 20th Street corridor or a new roadway corridor alignment to the east of 20th Street (i.e., system spacing requirements);
- At-grade versus grade separated crossings of the BNSF Railway tracks north of CSAH 75 and the BNSF Railway tracks north of TH 23. Stearns County will coordinate with BNSF Railway to determine the appropriate type of crossing at these locations;
- Intersection control (e.g., roundabout, at-grade signalized, interchange) at the Southwest Beltway/TH 23 intersection; and
- Design and reconstruction of the existing CSAH 133 corridor from the point where the West Corridor Alternative ties in to the CSAH 133 roadway and the CSAH 4/144 intersection.

5.2.2 Central Corridor Alternative

The Central Corridor Alternative is located in the middle portion of the study area between the City of St. Joseph and the City of Waite Park. The north-south alignment of the Central Corridor Alternative ties in to the existing CSAH 133 alignment in St. Wendel Township approximately one mile southwest of the CSAH 4/133 intersection, and approximately two miles northeast of the CSAH 75/133 intersection. The Central Corridor Alternative crosses CSAH 75 near the CSAH 134 intersection, and continues south to the Sauk River. The Central Corridor Alternative crossing of the Sauk River is approximately 0.7 miles southwest of the existing CSAH 75 bridge over the Sauk River, and approximately 1.5 miles northeast of the existing CR 121 bridge over the Sauk River.

The Central Corridor Alternative intersection with TH 23 is located approximately 1.7 miles northeast of I-94 at Julip Road. South of TH 23, the Central Corridor Alternative utilizes the existing CR 137 alignment before turning east along the south boundary of Quarry Park. The Central Corridor Alternative would terminate at a future TH 15/33rd Street South interchange.

Design elements are also under consideration for Central Corridor Alternative. These design elements would be discussed at the start of the EIS process as part of design and traffic engineering studies. These design elements include:

- At-grade versus grade separated crossings of the BNSF Railway tracks north of CSAH 75 and the BNSF Railway tracks north of TH 23. Stearns County will coordinate with BNSF Railway to determine the appropriate type of crossing at these locations; and

- Intersection control (e.g., roundabout, at-grade signalized, interchange) at the Southwest Beltway/TH 23 intersection.
- Design and reconstruction of the existing CSAH 133 corridor from the point where the Central Corridor Alternative ties in to the CSAH 133 roadway and the CSAH 4/144 intersection.

5.2.3 East Corridor Alternative

The East Corridor Alternative is located in the eastern portion of the study area closest to the City of Waite Park. The north-south alignment of East Corridor Alternative ties in to the existing CSAH 133 alignment in St. Wendel and Le Sauk Townships adjacent to the CSAH 4/133 intersection. The East Corridor Alternative follows the City of St. Cloud/St. Joseph Township boundary to the Sauk River. The East Corridor Alternative crosses the Sauk River approximately 0.2 miles northeast of the existing CSAH 75 bridge over the Sauk River. The East Corridor Alternative crosses CSAH 75 near the CR 138 intersection, and continues south along the 28th Avenue corridor.

The East Corridor Alternative intersection with TH 23 is located approximately 2.4 miles northeast of I-94 at 28th Avenue. The East Corridor Alternative continues south of TH 23 along the proposed 28th Avenue extension to CR 137 (programmed for construction in 2008). The East Corridor Alternative utilizes the existing CR 137 alignment before turning east along the south boundary of Quarry Park. The East Corridor Alternative would terminate at a future TH 15/33rd Street South interchange.

Several design elements are under consideration for East Corridor Alternative. These design elements would be discussed at the start of the EIS process as part of design and traffic engineering studies. These design elements include:

- At-grade versus grade separated crossings of the BNSF railroad tracks north of CSAH 75 and the BNSF railroad tracks north of TH 23. Stearns County will coordinate with BNSF Railway to determine the appropriate type of crossing at these locations;
- Access considerations along existing 28th Avenue. Industrial and commercial/office land uses are located along existing 28th Avenue in Waite Park. This segment of existing 28th Avenue includes multiple direct driveway access to/from 28th Avenue; and
- Intersection control (e.g., roundabout, at-grade signalized, interchange) at the Southwest Beltway/TH 23 intersection.

5.3 Build Alternative Design Criteria

The Project Management Team (PMT), along with input from the Advisory Committee (AC) (see Section 7.0), identified design criteria to guide development of the Build Alternative alignments in the DEIS. These design criteria were based on St. Cloud APO access management guidelines, *Stearns County Highway Department Access and Right-of-Way Width Guidelines* (2001), and basic engineering principles. The design criteria were sub-divided into the north-south segment between CSAH 4/133 and TH 23 and the east-west segment between TH 23 and TH 15. A parkway-like design was identified for the north-south segment between CSAH 4/133 and TH 23 because this is the primary growth area between the cities of St. Joseph and Waite Park. A rural section design for the east-west segment between TH 23 and TH 15 was identified by the PMT and will be evaluated in the DEIS.

The Build Alternative design between TH 23 and the Sauk River could include an area that transitions from an urban to rural typical section design. This typical section transition area will be evaluated with the Build Alternative design in the DEIS.

The design criteria that will guide Build Alternative design in the DEIS is identified in Table 1.

**TABLE 1
SOUTHWEST BELTWAY: BUILD ALTERNATIVE DESIGN CRITERIA**

Segment	Functional Classification	Design Speed	Typical Section	Trails	Access	ROW
North-South (CSAH 133 to TH 23)	Minor Arterial	45-50 mph	4-lane urban parkway divided	Separated bike and pedestrian trail on one side	½ mile (minimum) controlled intersection	150 feet
East-West (TH 23 to TH 15)	Minor Arterial	45-50 mph	4-lane rural divided	Separated bike and pedestrian trail on one side	½ mile (minimum) controlled intersection	220 feet or 150 feet

6.0 ISSUES TO BE ADDRESSED IN THE DEIS

Based on information received during the scoping study, the following areas of environmental concern will require special studies (separate reports) in the EIS to better determine the extent of impacts related to the proposed alternatives:

- Cultural Resources
- Parks and Recreational Areas
 - Section 4(f) Evaluation and Section 6(f) Involvement (if necessary)
- Traffic Forecasts and Operations Analysis

The following issues are of concern for the project. The EIS will provide a detailed analysis of impacts for each of these social, economic, or environmental concerns, but no separate reports will be generated. Coordination of these issues with the appropriate regulatory agency will occur during preparation of the EIS.

- Project Cost and Funding
- Joint Development Measures
- Transportation Impacts
 - Intermodal Transportation
 - Access Impacts
- Social and Economic Impacts
 - Social Impacts (Neighborhood and Community Facilities and Community Cohesion)
 - Land Use Impacts
 - Environmental Justice
 - Economic Impacts

- Physical Environmental Impacts
 - Air Quality
 - Traffic Noise
 - Farmland Impacts
 - Hazardous Materials and Contaminated Sites
 - Visual Quality/Visual Impacts
- Natural Environmental Impacts
 - Vegetation
 - Threatened and Endangered Species and Natural Communities
 - Fish and Wildlife Impacts
 - Geology
- Water Resources
 - Surface Water/Water Quantity and Quality/Stormwater Management
 - Floodplain Impacts
 - Groundwater Impacts
 - Wetland Impacts
 - Water Body Modification
- Right of Way Acquisition and Relocation
- Indirect Effects Analysis
- Cumulative Effects Analysis

The following issues are of less concern (relative to the issues identified in Section 6.2) for the proposed project. The EIS will identify impacts, including analysis in accordance with Federal and State requirements where appropriate. However, major impacts are not anticipated with each of these areas.

- Construction Impacts
- Excess Materials
- Soils
- Utility Locations
- Relationship of Local Short-Term Uses Versus Long-Term Productivity
- Irreversible and Irretrievable Commitment of Resources

The following issues will not be addressed in the EIS because they are not relevant to the proposed project.

- Coastal Zone Impacts and Coastal Barriers
- Federal and/or State-Designated Critical Areas
- Wild and Scenic Rivers

7.0 PUBLIC AND AGENCY INVOLVEMENT

Stearns County, as project proposers, along with members of the Project Management Team (PMT), will engage community organizations, area property owners, residents, business owners, and local, county, regional, state and federal agencies in the development of the proposed project. Public and agency involvement is described below. The Agency and Public Coordination Plan is included in Appendix A of the Scoping Document (SD).

7.1 Project Management Team

The PMT consists of staff from Mn/DOT District 3, St. Cloud APO, Stearns County, the City of St. Joseph, and the City of Waite Park. The role of the PMT is to provide the direction to advance the proposed project through this scoping study and the environmental review process. In addition, the PMT provides recommendations for consideration to the Advisory Committee.

7.2 Advisory Committee

The Advisory Committee (AC) includes elected or appointed officials from local government agencies and PMT members. The AC meets at key points in the environmental review process to review study information and provide recommendations. Advisory Committee agencies include:

- Minnesota Department of Transportation District 3
- St. Cloud APO
- Stearns County
- City of St. Joseph
- City of Waite Park
- City of St. Cloud
- City of Sartell
- St. Joseph Township

The roles of the Advisory Committee agencies are identified in the Scoping Public Involvement Plan in the Agency and Public Involvement Plan in Appendix A.

7.3 Cooperating and Participating Agencies

The Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) establishes a new environmental review process for transportation projects developed as environmental impact statements. These requirements are intended to promote efficient project management by lead agencies and enhanced opportunities for coordination with the public and with other Federal, State, local, and tribal government agencies during the project development process. To enhance interagency coordination and ensure that issues of concern are identified, SAFETEA-LU creates a new category of involvement in the environmental review process termed “participating agency.” The intent of the new category is to encourage governmental agencies at any level with an interest in the proposed project to be active participants in the NEPA evaluation.²

² U.S. Department of Transportation. Federal Highway Administration and Federal Transit Administration. November 2006. *SAFETEA-LU Environmental Review Process Final Guidance*.

The following Federal agencies were invited by FHWA to serve as cooperating agencies³ for the project.

- U.S. Army Corps of Engineers
- U.S. Environmental Protection Agency
- U.S. Fish and Wildlife Service

The following Federal, State, and local agencies were invited by FHWA to serve as participating agencies for the project.

Federal Agencies

- U.S. Department of Agriculture, Natural Resources Conservation Service
- Advisory Council on Historic Preservation

State Agencies

- Minnesota Department of Natural Resources
- Minnesota Pollution Control Agency
- Minnesota Department of Agriculture
- Minnesota Board of Soil and Water Resources
- Minnesota State Historic Preservation Office
- Minnesota Department of Transportation (Trunk Highway)

Local Agencies

- Sauk River Watershed District
- Stearns County Soil and Water Conservation District
- Stearns County Environmental Services
- City of St. Joseph
- City of Waite Park
- City of Sartell
- City of St. Cloud
- City of Rockville
- St. Joseph Township
- St. Wendel Township
- Le Sauk Township

The role of Cooperating and Participating Agencies as part of the Southwest Beltway environmental review and project development process is documented in the Agency and Public Involvement Plan in Appendix A of the scoping document.

³ According to the US DOT *SAFETEA-LU Environmental Review Process Final Guidance* (2006), Federal agencies that serve as cooperating agencies are, by definition, also considered participating agencies.

7.4 Public Meetings

An open house meeting was held August 8, 2007 in at the Waite Park City Hall to provide information on the project, highlight initial findings regarding project purpose and need, highlight potential environmental issues identified within the study area, describe the alternatives development process, including alternatives identified in past studies, and to collect comments and feedback from the public.

A second open house meeting was held November 14, 2007 at the Waite Park City Hall to provide updated information on the project, provide updated findings regarding project purpose and need, highlight the alternatives screening and development process to date, and to collect comments and feedback from the public.

Focus group meetings were also conducted in August and November 2007, concurrent with public open house meetings. Focus group meeting attendees included local planning commission members, economic development authority (EDA) members, railroad and electric utility staff, as well as local businesses. The purpose of the focus group meetings was to provide information on the project and collect background information on the study area.

A public scoping meeting will be held during the 30-day public comment period for the SD. The public scoping meeting will present the findings of the SD and the draft SDD. Comments received at the scoping meeting will be considered in the final SDD.

Open house meetings and public hearings will also be held during the DEIS phase of the environmental review process.

7.5 Project Website

A web site has been established at <http://www.co.stearns.mn.us/5834.htm> as a means to distribute project-related information and to announce upcoming public meetings and Advisory Committee meetings. This web site is hosted by Stearns County. The web site will be periodically updated through the project to reflect current project information.

8.0 PERMITS AND APPROVALS

A list of applicable permits and approvals anticipated for the proposed Southwest Beltway project is provided in Table 2.

8.1 Level of Action

The proposed Southwest Beltway Project is considered a Federal Class I action as defined in 23 CFR 771.115(a). As previously noted, FHWA is the lead federal agency for this project. The proposed Southwest Beltway Project also meets the mandatory EIS threshold under Minnesota Rules 4410.4400, subp. 16 (construction of a road on a new location which is four or more lanes in width and two or more miles in length). Stearns County is the RGU for this project.

**TABLE 2
ANTICIPATED PERMITS AND APPROVALS REQUIRED**

AGENCY	PERMIT/APPROVAL
Federal	
Advisory Council on Historic Preservation	<ul style="list-style-type: none"> • Section 106 of the National Historic Preservation Act – Memorandum of Agreement (if needed)
Federal Highway Administration	<ul style="list-style-type: none"> • EIS Approval (draft and final) • EIS Record of Decision (ROD) • Section 4(f) Evaluations (draft and final) (if needed) • Section 106 of the National Historic Preservation Act – Memorandum of Agreement (if needed)
U.S. Army Corps of Engineers	<ul style="list-style-type: none"> • Section 404 of the Clean Water Act – Permit (fill in waters of the U.S.) • Section 10 of the Rivers and Harbors Act – Permit (if needed for construction of bridge over Sauk River) • Section 106 of the National Historic Preservation Act – Memorandum of Agreement (if needed)
State	
Minnesota Department of Transportation	<ul style="list-style-type: none"> • EIS Approval (draft and final) • Plan Review
Minnesota Department of Natural Resources	<ul style="list-style-type: none"> • Protected Waters Permit • Mussel Relocation Permit (if needed for construction of bridge over Sauk River)
Minnesota Pollution Control Agency	<ul style="list-style-type: none"> • Section 401 Water Quality Certification • NPDES Permit
Minnesota State Historic Preservation Office	<ul style="list-style-type: none"> • Section 106 of the National Historic Preservation Act – Memorandum of Agreement (if needed)
Local	
Stearns County	<ul style="list-style-type: none"> • Scoping Decision Document • EIS Approval (draft and final) • EIS Adequacy Determination • Wetland Conservation Act (WCA)
Sauk River Watershed District	<ul style="list-style-type: none"> • Coordination of Grading and Drainage Plans • Watershed District Permit
Stearns County Soil and Water Conservation District	<ul style="list-style-type: none"> • Coordination of Grading and Drainage Plans
Other	
Stearns County and BNSF Railway	<ul style="list-style-type: none"> • Railroad Agreement and/or Permit (if needed for crossings of BNSF Railway tracks near TH 23 and CSAH 75)