

**MEMORANDUM**

TO: Mitch Anderson, PE  
County Engineer

Jodi Teich, PE  
Assistant County Engineer

FROM: Brett Danner

DATE: September 20, 2011

SUBJECT: SOUTHWEST BELTWAY SCOPING DOCUMENT  
S.P. 73-684-003  
PROJECT CLOSE-OUT MEMORANDUM

The purpose of this memorandum is to document the project history, project need, alternatives identification, and major issues that were identified during the Southwest Beltway Project scoping process from 2007 to 2009.

**PROJECT DESCRIPTION**

The following section includes the project location description, project need and alternatives identification as documented in the Scoping Decision Document (SDD) (participating agency review draft, August 2009).

Project Location

The Southwest Beltway Project includes 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 Area in Stearns County, Minnesota. The Southwest Beltway project 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 (see attached Figure 1).

The cities of St. Joseph and Waite Park are expected to expand towards one another – the City of St. Joseph is expanding to the east and northeast and the City of Waite Park is expanding to the west and south. At the middle and southern portions of the project area, the cities of Waite Park

and St. Joseph are currently separated from one another by St. Joseph Township. At the north end of the project area, the City of St. Joseph is currently separated from the City of St. Cloud by St. Joseph Township and St. Wendel Township. Both cities of Waite Park and St. Joseph have annexation agreements with St. Joseph Township. For the purposes of this study, these annexation areas in St. Joseph Township are referred to as the Waite Park growth area and St. Joseph growth area, respectively.

## **PROJECT NEED**

Travel demand forecasts were completed using the travel demand model developed and approved by the St. Cloud Area Planning Organization (APO) for use in the St. Cloud Metropolitan Area. Travel demand forecasts were completed for future year 2030 conditions and future conditions beyond year 2030 under the No-Build scenario to evaluate the future travel demands within the Southwest Beltway project area. These travel demand forecasts are based on population, employment, and land-use forecasts over an approximate 20-year planning horizon to year 2030. Future year 2030 conditions represent land use and socioeconomic forecasts based on the APO's 2030 Transportation Plan. Land uses in the APO's 2030 Transportation Plan are tied to local comprehensive land use plans, as well as other factors, and distributed throughout the APO's planning area based on year 2030 demographic forecasts. Future conditions beyond year 2030 assume full build-out of planned land uses for the growth areas of Waite Park and St. Joseph based on the comprehensive land use plans for both cities.

Details regarding the purpose and need for the project are described in Section 2.4 of the *Southwest Beltway Scoping Document* (November 2008). The basic transportation need for the proposed project is to serve forecast increases travel demand within the southwest St. Cloud Metropolitan Area as summarized below:

1. Trip Distribution/Daily Travel Patterns: Approximately 81,000 daily vehicle trips (trip ends to or from the growth area)<sup>1</sup> are forecast to have origins and destinations in the Waite Park growth area under future year 2030 conditions. Approximately 440,000 daily vehicle trip ends are forecast to come from or are destined to the Waite Park growth area based on planned, future land uses beyond year 2030. Of these vehicle trip ends, nearly 50 percent, or approximately 208,000 vehicle trip ends, are internal trip ends originating from and destined to points within the Waite Park growth area.

Approximately 150,000 daily vehicle trip ends are forecast to have origins and destinations in the St. Joseph growth area under future year 2030 conditions. Approximately 164,000 daily trip ends are forecast to come from or are destined to the St. Joseph growth area based on planned, future land uses beyond year 2030. Of these vehicle trip ends, nearly 30 percent, or approximately 45,900 vehicle trip ends, are

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<sup>1</sup> Trips are produced by or attracted to a particular travel analysis zone, depending upon the type of trip (e.g., home/work trip). Each trip has two ends. A trip end is the beginning or end point of a particular trip.

internal trip ends originating from and destined to points within the St. Joseph growth area.

2. Existing Transportation System: While the existing transportation system accommodates trips entering, exiting, and passing through the St. Cloud Metropolitan Area, or accommodates trips on the periphery of the project area, there is no continuous east-west transportation facility between TH 23 and TH 15, and no continuous north-south transportation facility between TH 23 and CSAH 4/133, to service the forecast increase in trips within the project area.
3. Serve Forecast Travel Demand: Based on the forecast increase trip generation, daily travel patterns, and the travel movements supported by the existing transportation system, there is a need to provide transportation infrastructure improvements that will serve the future increase in travel demand within the Waite Park and St. Joseph growth areas.

## **ALTERNATIVES IDENTIFICATION**

The No-Build Alternative and three Southwest Beltway Build Alternative alignments were identified for future study in the SDD. The three Build Alternative alignments are summarized below and illustrated in the attached Figure 2.

### 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.

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.

### 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.

#### 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.

#### Design Considerations for Future Study

The following design considerations were identified in the SDD for study in the future Environmental Impact Statement (EIS):

- Use of the existing CR 121 bridge over the Sauk River (i.e., no bridge reconstruction) versus reconstruction of this existing bridge under the West Corridor Alternative.
- Construction using the St. Joseph 20th Street corridor or a new roadway corridor alignment to the east of 20th Street and consideration of transportation system spacing needs under the West Corridor Alternative.
- Access considerations along existing 28th Avenue under the East Corridor Alternative. Industrial and commercial/office land uses with multiple direct driveway access points are located along 28th Avenue in Waite Park.
- Design and reconstruction of the existing CSAH 133 corridor from the point where the Build Alternative corridor alignments intersect with the existing CSAH 133 roadway and the CSAH 4/144 intersection.
- At-grade versus grade separated crossings of the BNSF Railway tracks north of CSAH 75 and the BNSF Railway tracks north of TH 23.
- Intersection control (e.g., roundabout, at-grade signalized, interchange) at the Southwest Beltway/TH 23 intersection.

### Southwest Beltway Design Criteria

Design criteria that were identified by the Project Management Team (PMT) and Advisory Committee (AC) during the Southwest Beltway scoping process are identified below in Table 1.

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

<b>Segment</b>	<b>Functional Classification</b>	<b>Design Speed</b>	<b>Typical Section</b>	<b>Trails</b>	<b>Access</b>	<b>ROW</b>
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

### **PROJECT HISTORY**

#### Scoping Document and Draft Scoping Decision Document

The following list identifies major milestones completed for the Southwest Beltway Scoping Document and Draft Scoping Decision Document (SD/DSDD).

- A project kick-off meeting was held with Minnesota Department of Transportation (MnDOT) State Aid and Federal Highway Administration (FHWA) staff on August 27, 2007. The purpose of this meeting was to review the SAFETEA-LU process requirements for starting the EIS process. Cooperating and participating agencies were identified and the content of the Coordination Plan was discussed.
- The notice of intent regarding the preparation of the Southwest Beltway EIS was published in the Federal Register (Vol. 73, No. 4) by FHWA on January 7, 2008.
- The SD/DSDD was distributed for participating agency review in March 2008. The 30-day participating agency review period started on March 19, 2008 and concluded on April 21, 2008. A participating agency meeting was held on March 26, 2008 at the Stearns County Public Works Building. Comments were received from the following participating agencies: Environmental Protection Agency (EPA), Natural Resources Conservation Service (NRCS), U.S. Army Corps of Engineers (Corps), Minnesota Department of Agriculture, Minnesota Department of Natural Resources (DNR), MnDOT, Sauk River Watershed District, and Stearns County Environmental Services.

- Two open house meetings were held during preparation of the SD/DSDD:
  - An open house meeting was held August 8, 2007 at the Waite Park City Hall (19 13th Street North, Waite Park). The purpose of this public meeting was to provide information on the project, highlight initial findings regarding project purpose and need, highlight potential environmental issues identified within the study area, and describe the alternatives development process.
  - An open house meeting was held November 14, 2007 at the Waite Park City Hall. The purpose of this public meeting was to provide updated information on the project, provide updated findings regarding project purpose and need, and to highlight the alternatives screening and development process completed to date.
- Focus group meetings were conducted concurrent with open house meetings in August and November 2007. 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 notice of availability for the SD/DSDD was published in the Minnesota Environmental Quality Board (EQB) *Monitor* on December 15, 2008. The 30-day comment period for the SD/DSDD began on Monday, December 15, 2008 and concluded on Wednesday, January 14, 2009.
- A public scoping meeting was held on January 7, 2009 as required by Minnesota Rules Chapter 4410.2100 Subpart 3. The public scoping meeting was held at Waite Park City Hall.

#### Scoping Decision Document

The participating agency review draft of the SDD was distributed for agency review in August 2009 (see attached distribution list). The 30-day participating agency review period began on August 7, 2009 and concluded on September 11, 2009. Comments were received from three participating agencies (see attached agency correspondence): EPA, DNR, and Minnesota Department of Agriculture.

Several substantive comments were identified in the comments received from the EPA. One specific comment regarding the disposition of agency comments is presented below.

EPA previously provided comments on the Scoping Document & Draft Scoping Decision Document (SD/DSDD) (dated March 2008) for this project in our April 21, 2008, letter to Mr. Mitchell Anderson, Stearns County Engineer. We recommend that our April 21, 2008, letter and this current letter be included in the final SDD document and in the future EIS.

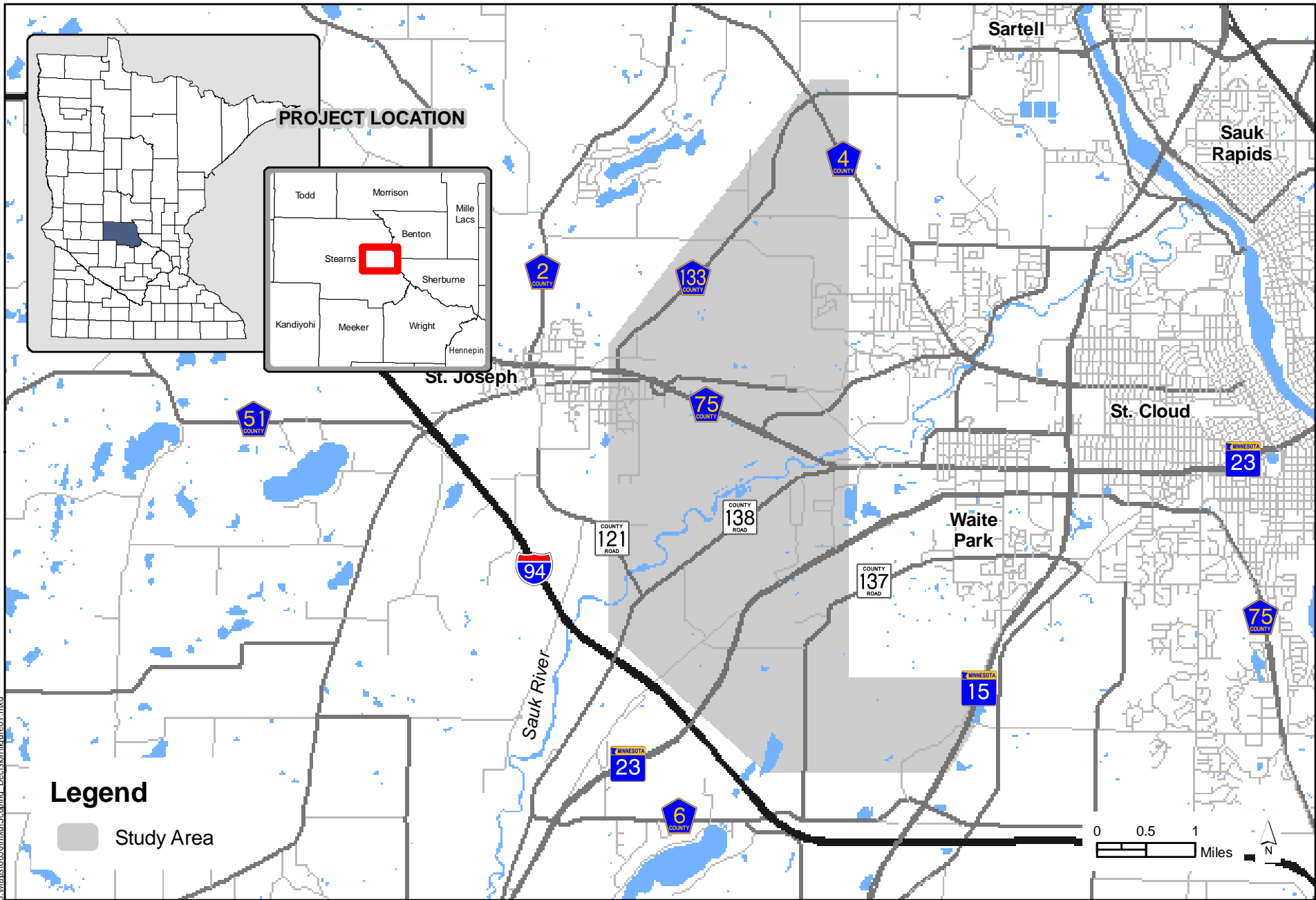
It is common practice that agency comments received during an agency review period on an environmental document (e.g., scoping document, EIS) be taken into consideration during preparation of the final environmental document. However, it is not standard practice to include letters received during an agency review period and formal responses in the final environmental document. MnDOT State Aid and FHWA staff was consulted regarding the above comment from EPA. FHWA staff agreed to consult with EPA and the disposition of comments received on the agency review draft would be clarified prior to publication of the SDD.

During the timeframe of this coordination between FHWA and EPA (2009 to 2010), FHWA implemented a policy regarding the National Environmental Policy Act (NEPA) and fiscal constraints. In summary, this policy stipulated that for FHWA to participate in the NEPA process and approve an environmental document under NEPA, a substantial financial contribution towards a project must be included in a fiscally constrained plan. At the time the Southwest Beltway SDD was prepared, no specific funding source had been identified, although a portion of the Southwest Beltway corridor from TH 15 to CR 137 was identified in the *2030 St. Cloud APO Transportation Plan* as a fiscally-constrained project for the year 2024-2030 planning period. Following consultation with FHWA, it was determined that the project would not meet fiscal constraint requirements to proceed through the NEPA process, and the Southwest Beltway scoping process was terminated in summer 2011.

BTD/gjd

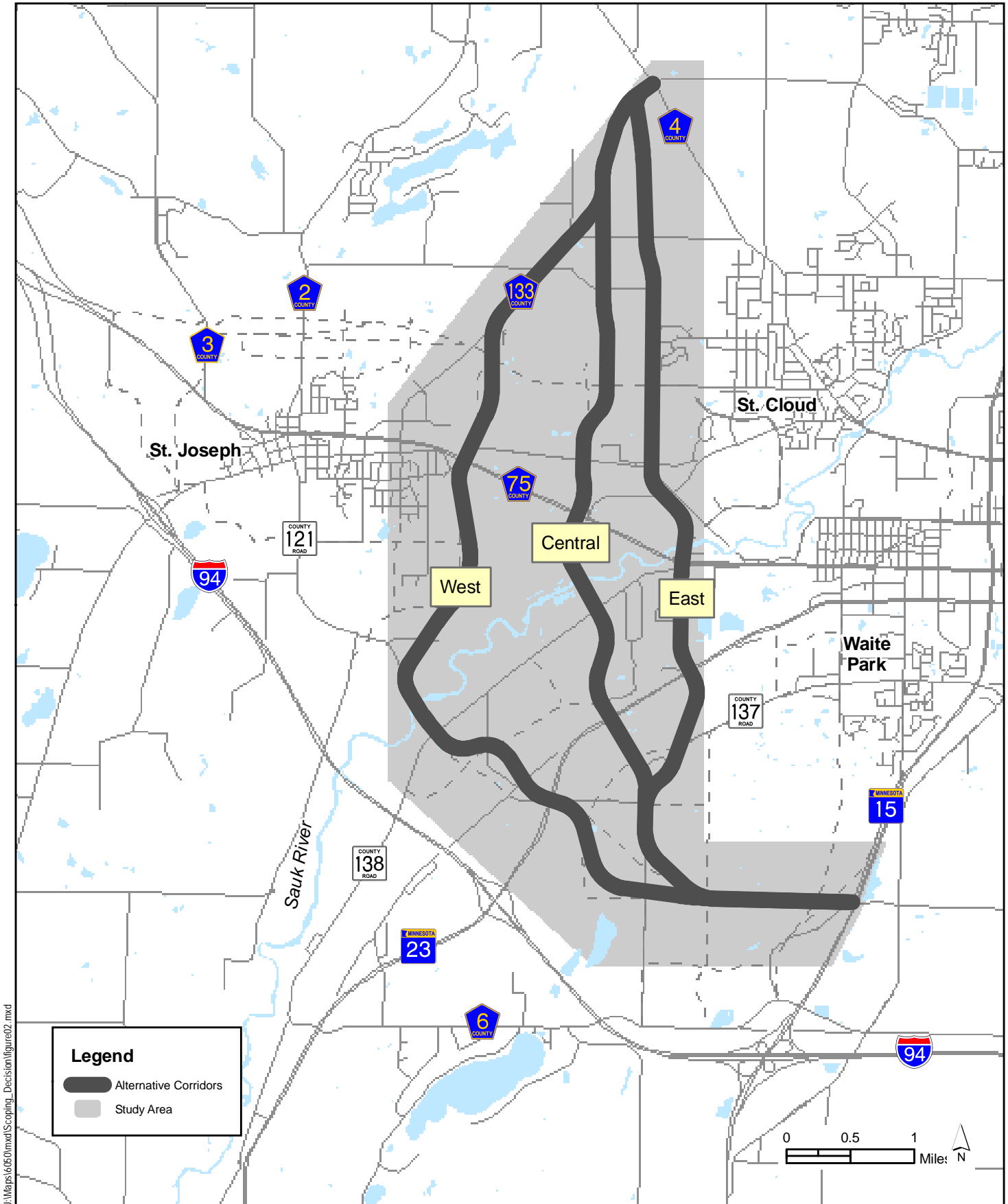
Attachments: Figure 1 (Area and Project Location Map)  
Figure 2 (Build Alternatives to be Evaluated in EIS)  
Scoping Decision Document Agency Distribution List  
Agency Comments (Draft Scoping Decision Document)

cc: Scott Mareck, St. Cloud APO  
Cathryn Hanson, St. Cloud APO  
Brian Shorten, SRF Consulting Group  
Project File



Area and Project Location Map

Figure 1



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### Build Alternatives to be Analyzed in DEIS

Figure 2

# Agency Distribution List

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## **Stearns County Southwest Beltway Project S.P. 73-684-03**

### **Participating Federal, State, and Local Agencies**

- FHWA (lead Federal agency)
- Mn/DOT State Aid (joint lead agency)
- Stearns County Public Works (joint lead agency)
- Federal Agencies:
  - Corps of Engineers
  - Environmental Protection Agency
  - US Fish and Wildlife Service
  - Natural Resources Conservation Service
- State Agencies:
  - Department of Natural Resources
  - Pollution Control Agency
  - Department. of Agriculture
  - Board of Soil and Water Resources
  - Mn/DOT District 3 (Trunk Highway)
  - Public Utilities Commission
- Local Government:
  - St. Cloud Area Planning Organization
  - Sauk River Watershed District
  - Stearns County Environmental Services
  - Stearns County Soil and Water Conservation District
  - City of Sartell
  - City of St. Cloud
  - City of St. Joseph
  - City of Waite Park
  - City of Rockville
  - Le Sauk Township
  - St. Joseph Township
  - St. Wendel Township



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

SEP 08 2009

SEP 14 2009

REPLY TO THE ATTENTION OF:

E-19J

Jodi Teich  
Assistant County Engineer  
Stearns County Public Works  
P.O. Box 246  
St. Cloud, Minnesota 56302

Re: EPA Comments on the *Scoping Decision Document (Participating Agency Review Draft)*,  
*Southwest Beltway Project, Future County State Aid Highway 84, Stearns County,*  
*Minnesota* dated August 2009.

Dear Ms. Teich:

The United States Environmental Protection Agency, Region 5 (EPA) received the SRF Consulting Group's August 7, 2009, memo with the above referenced participating agency review draft Scoping Decision Document (draft SDD). The memo identifies that the preparation of the Federal Highway Administration (FHWA) National Environmental Policy Act (NEPA) Environmental Impact Statement (EIS) for this current proposal is not anticipated to begin until 2010. We offer the following comments on the documentation in the draft SDD and proposed future EIS for FHWA, Minnesota Department of Transportation (MnDOT) and Stearns County's consideration prior to preparing the final SDD.

EPA previously provided comments on the Scoping Document & Draft Scoping Decision Document (SD/DSDD) (dated March 2008) for this project in our April 21, 2008, letter addressed to Mr. Mitchell Anderson, Stearns County Engineer. We recommend that our April 21, 2008, letter and this current letter be included in the final SDD document and in the future EIS.

**Purpose and Need/Alternatives:** In our April 21, 2008, letter we recommended that the final SDD identify the underlying transportation problem/s that need to be solved and include the specific traffic studies (e.g., origin destination studies) that substantiate the need. Currently, we recommend the final SDD and upcoming DEIS provide an updated assessment of purpose and need given that the regional and local land use plans and growth assumptions that were used to project future origin/destination trips and traffic volumes in the 2008 SD/DSDD and current draft SDD are based on economic conditions that do not account for the current major recession since late 2008 and the corresponding significant increases in housing foreclosures and job losses, and significant reductions in new housing starts in the United States. Consequently, the current draft SDD future traffic projections may no longer be relevant for substantiating the purpose and need

for the preservation of a beltway corridor and/or construction of a beltway in the reasonably foreseeable future. An alternative that is comprised of a combination of Transportation Demand Management (TDM) strategies such as bus transit, increased car pooling, pedestrian/bike paths, and staggering work hours might be a viable transportation alternative that would allow for a low-cost, low-impact strategy to address future transportation problems based on the updated transportation need projected. We recommend that such an alternative be included in the range of alternatives to be evaluated in the upcoming EIS. A broader range of alternatives to choose from may result in a preferred alternative that has less adverse impact on the environment than those action alternatives currently proposed.

EPA concurs with most of the issues to be addressed in the DEIS as identified in the draft SDD. However, we also recommend the following issues be addressed and/or be given further consideration in the DEIS.

**Wetlands:** The Section 404(b)(1) Guidelines of the Clean Water Act (CWA) require that wetland areas be avoided unless no practicable alternatives exist and unavoidable wetland losses are compensated. If wetland impacts are unavoidable, the EIS must demonstrate that there are no practicable alternatives available that would avoid or have less wetlands impacts. We continue to recommend that the EIS contain a sufficient level of detailed information concerning the location, type and amount of wetlands that will be directly and/or indirectly impacted by each alternative. The draft SDD identifies that the DEIS will not include the information from field wetland delineations. Consequently, we recommend the DEIS identify the location of all hydric soils in the study area and use that information along with the currently proposed information (e.g., National Wetlands Inventory) to identify and evaluate wetland resources in the study area and potential impacts to those resources from the various DEIS alternatives. We also recommend the DEIS identify farmed wetlands and evaluate the action alternatives potential to impact farmed wetlands.

We appreciate that the DEIS will include a wetland functions and values assessment for all potentially affected wetlands. This information should be used to identify the least environmentally damaging practicable alternative (LEDPA) and will help to identify suitable potential future wetland compensation mitigation sites. We continue to recommend that the DEIS identify potential compensation mitigation areas for potential wetland loss that can not be avoided.

**Climate Change:** The DEIS should identify and discuss how climate change might impact any of the action alternatives over their operable life time. For example, would changes in the timing, intensity and duration of rainfall and snowfall events due to climate change affect the stability and consequently the safety of the roadway bed and bridges? How would such precipitation events impact a proposed roadway's ability to adequately channel and treat stormwater runoff? We recommend that feasible mitigation measures to ameliorate any potential adverse effects to the action alternatives due to climate change be identified in the DEIS. For example, this might include, but is not limited to, extending the length of a bridge across streams

and their associated floodplains to allow for unrestricted floodwater flow during drastic precipitation events and/or increasing the size of storm water detention ponds.

**Wildlife Corridors:** We recommend the DEIS identify and assess the value of all wildlife corridors in the study area. The evaluation and comparison of action alternative impacts should include their impact on wildlife corridors. Mitigation measures, such as bridging across floodplains and/or incorporating wildlife crossings at crucial areas that are identified in consultation with the Minnesota Department of Natural Resources (MnDNR), should be included in the DEIS.

**Vegetation/Forests:** The DEIS should disclose the type and amount of vegetation that would be permanently lost due to each action alternative and the fate of the cut vegetation. We recommend the NEPA document identify and discuss the important functions that trees play in protecting water quality in the immediate watershed, including providing wildlife habitat and carbon sequestration. EPA recommends voluntary mitigation for the loss of these trees. Mitigation might include, but need not be limited to, assisting local, county or state agencies with any on-going or planned forest reclamation projects in the watershed or planting native tree saplings in wetland compensation mitigation buffer areas, if feasible. We recommend the NEPA document disclose whether or not Stearns County will undertake voluntary mitigation for the loss of trees associated with this proposal.

**Surface and Ground Water Quality/Hazardous Spills:** The DEIS should identify and discuss the potential for adverse impacts to surface and groundwater resources from accidental spills of hazardous/toxic substances during construction and/or operation of a roadway alternative. We also recommend mitigation measures, such as collection and routing of roadway drainage to detention basins located outside wetlands, streams and/or well head protection areas, be identified in the DEIS. Potential stormwater runoff treatment locations should be identified in the EIS for all roadway corridor alternatives.

**Construction impacts:** The DEIS should identify and discuss construction impacts (e.g., air quality, noise, vibration) especially in relation to determining whether or not there is a potential for a disproportionate impact to environmental justice communities and/or other sensitive receptors, such as children and associated daycare facilities, schools and hospitals. EPA recommends the specific measures (best management practices) that can be undertaken to minimize construction impacts to air quality, noise, vibration, as well as water resources, soils and other regulated resources be identified in the NEPA document.

We recommend the NEPA document identify opportunities for the project proponents to use clean diesel equipment, vehicles and fuels in construction of the project. We recommend the project proponents consider implementing one or more of the following measures when feasible:

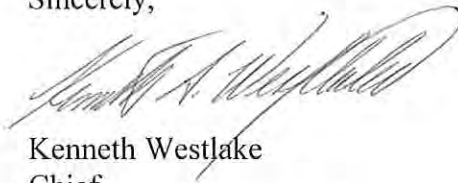
- Reduce emissions of diesel particulate matter (DPM) and other air pollutants by using particle traps and other technological or operational methods. Control technologies, such as traps, control approximately 80 percent of DPM. Specialized catalytic converters (oxidation catalysts) control approximately 20 percent of DPM,

40 percent of carbon monoxide emissions, and 50 percent of hydrocarbon emissions.

- Ensure that diesel-powered construction equipment is properly tuned and maintained, and shut off when not in direct use.
- Prohibit engine tampering to increase horsepower.
- Locate diesel engines, motors, and equipment as far as possible from residential areas and sensitive receptors (e.g., schools, daycare centers, and hospitals).
- Require low sulfur diesel fuel (<15 parts per million), if available.
- Reduce construction-related trips of workers and equipment, including trucks.
- Lease or buy newer, cleaner equipment (1996 or newer model), using a minimum of 75 percent of the equipment's total horsepower.
- Use engine types such as electric, liquefied gas, hydrogen fuel cells, and/or alternative diesel formulations, if feasible.

We appreciate the opportunity to provide our comments on the draft SDD. If you would like to discuss this letter in more detail, please contact Virginia Laszewski of my staff at 312-886-7501 or email her at [laszewski.virginia@epa.gov](mailto:laszewski.virginia@epa.gov).

Sincerely,



Kenneth Westlake  
Chief  
NEPA Implementation Section  
Office of Enforcement and Compliance Assurance

cc: Federal Highway Administration, Galtier Plaza, 380 Jackson Street, Suite 150, St. Paul, Minnesota 55101 (Attention: Cheryl Martin, Environmental Engineer)

Received

AUG 14 2009

August 13, 2009

Jodi Teich  
Assistant County Engineer  
Stearns County Public Works  
PO Box 246  
St. Cloud, MN 56302

RE: Stearns County Southwest Beltway Project  
Scoping Decision Document (Participating Agency Review Draft)  
S.P. #73-684-03 (Future CSAH 84)

Dear Ms. Teich:

Thank you for the opportunity to comment on the Stearns County Southwest Beltway Project Scoping Decision Document (Participating Agency Review Draft). In Section 6.0 "Issues To Be Addressed", the document lists farmland impacts as one of the many issues that will require special study in the EIS. The Minnesota Department of Agriculture (MDA) would like to once again stress the importance of our experience with proposed highway projects through farmland, we have learned that there are numerous impacts that can severely affect farming operations and ag-businesses located along the potential project area. Based on those experiences and the project document, the MDA recommends that the EIS examine the following:

**Restricted Road Access**

It appears that the proposed highway realignments will restrict farm to market road access and possibly remove some at-grade access making it very difficult for field and market access. The connectivity and continuity between the roads intersecting future CSAH 84 is important to maintain.

Farmers are highly dependent upon quick and adequate accessibility to main thoroughfares. Restricted access will increase their time, distance and transportation costs, which will directly impact their farming operations. Also, restricted access will displace heavy vehicles and equipment onto roads with weight restrictions.

- The owners of the impacted farms should be consulted to discuss alternatives to lessen the impact. Possible alternatives should address but not be limited to:
  - Owner's suggestions;
  - right of way acquisition to accommodate a frontage road;
  - a change in access to the farmstead; and
  - potential visual/audible impacts to the farmstead.

**Severed, Triangulated or Isolated Farmland**

The impact of severed, triangulated or isolated farmland may be farming remnants that are difficult from a practical standpoint. There may be problems of getting to the field and once there, problems of maneuvering farm equipment on the field. Also, smaller fields that are oddly shaped may be less valuable than fields of typical dimension and

size. All severed, triangulate or isolated farmland should be identified on a map and include acreages for each parcel. Acquisition for loss of productive land should be addressed.

#### **Relocating Livestock Operations**

Indicate if any livestock operations will need to be relocated. Relocating a livestock operation would result in several consequential impacts:

- The controversy surrounding the issue of siting a livestock operation, particularly a hog operation, can make it very difficult for the owner to relocate his/her facility. There are no guarantees that a local governing unit would permit the owner to rebuild, therefore, threatening his/her livelihood. Compensation for any loss of livelihood would have to be addressed.
- Also, livestock operations are often located adjacent to cropland, thereby allowing the owner to spread the hog manure on fields without incurring costs for transporting manure. If the operation is relocated, transportation costs will then be incurred to haul the manure. Costs could be significant depending on where the operation is relocated.

#### **Flooded Fields**

Storm water runoff from the new highways can flood crops. Mitigation should include reparation of severed tile lines and loss of yield due to flooding.

In each of the above cases where a farmstead or ag-business is directly impacted, a memorandum of agreement (MOA), between owner and Mn/DOT should be drafted. The MOA should include specific measures to minimize impacts to the property, and should be included in the final scoping document.

Thank you for the opportunity to prepare comments on the scoping decision document. Please feel free to contact me at (651) 201-6369 or [becky.balk@state.mn.us](mailto:becky.balk@state.mn.us) if you have any questions regarding this matter.

Sincerely,



Becky Balk, Agricultural Land Use Specialist  
Agricultural Development and Financial Assistance Division

Cc: Bob Patton

**Brett Danner - FW: Stearns County Southwest Beltway Project**

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**From:** "Teich, Jodi" <Jodi.Teich@co.stearns.mn.us>  
**To:** "Brett Danner" <bdanner@srfconsulting.com>  
**Date:** 9/2/2009 10:35 AM  
**Subject:** FW: Stearns County Southwest Beltway Project

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FYI. See below.

**Jodi L. Teich, P.E.**  
Assistant County Engineer  
Stearns County Public Works  
455 28th Avenue South  
Waite Park, MN 56387  
Phone: (320) 255-6180  
Fax: (320) 255-6186  
[jodi.teich@co.stearns.mn.us](mailto:jodi.teich@co.stearns.mn.us)

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**From:** Mike [<mailto:Mike@srwdmn.org>]  
**Sent:** Wednesday, September 02, 2009 10:29 AM  
**To:** Teich, Jodi  
**Subject:** Stearns County Southwest Beltway Project

Hello Jodi,

With regards to the DRAFT Southwest Beltway Scoping Decision Document, the Sauk River Watershed would like to thank you for the current information and ask that we be included in any further updates. As always, water quality and environmental impact remain our focus. With a project that includes crossing of the Sauk River, our focus will definitely be on resource protection. As this project is still very early in the developmental stages, the District will continue to monitor progress and looks forward to reviewing the future Scoping Decision and EIS.

Kind Regards,

Michael Hayman  
Ditch/Permit Coordinator

Sauk River Watershed District  
524 4th Street South  
Sauk Centre, MN 56378  
Phone: (320) 352-2231  
Fax: (320) 352-6455  
[Mike@srwdmn.org](mailto:Mike@srwdmn.org)