

10.0 SECONDARY IMPACTS

The Council on Environmental Quality (CEQ) regulations (40 CFR 15888.8) distinguish between direct and indirect effects. Direct effects are caused by an action and occur at the same time and place as the action. Indirect effects, or secondary impacts, are reasonably foreseeable effects caused by the action that occur later in time or farther in distance. Secondary impacts may include effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems. Chapters 4 – 9 of this DEIS discuss direct impacts resulting from the I-94/TH 10 Interregional Connection project. This chapter will discuss secondary impacts resulting from the proposed project.

There is the potential for secondary impacts as a result of the proposed I-94/TH 10 Interregional Connection project. As identified in the CEQ regulations, secondary impacts may include growth induced development or a change in land use patterns. The proposed project would not induce growth in the study area, as overall growth in the study area is anticipated to remain the same whether or not the proposed project is implemented (see Section 10.1.1). However, the proposed project could result in a change in the location of new development, thus creating a localized change in land use patterns with resulting effects on local natural resources. These effects would differ for each alternative and are addressed in Section 10.1.

The outcome (i.e., preferred alternative) of the I-94/TH 10 Interregional Connection EIS process will also indirectly affect the location of improvements planned for the I-94 and TH 10 corridors as noted in Section 4.2. Improvements planned for the I-94 and TH 10 corridors are not part of the I-94/TH 10 Interregional Connection project and would be implemented as independent improvement projects. The secondary impacts of the I-94 and TH 10 improvements for each of the DEIS alternatives are compared in Section 10.2.

10.1 SECONDARY IMPACTS RELATED TO LAND USE

10.1.1 Affected Environment

Mn/DOT has met with the communities in the study area to review their planned future land use and development trends. As discussed in Chapter 5, Section 5.1.1.1, most of the communities in the study area anticipate substantial growth within the next 40 years (see Table 5.3 *2040 Population Projections for Cities and Townships in the Study Area*). These communities have indicated that the projected growth is anticipated with or without the addition of a new river crossing and none of the communities indicated an intent to reduce growth if the proposed project was not implemented.

As the land use and development trends for communities in the study area are planned with or without the I-94/TH 10 improvements, consideration of secondary impacts to land use and development focused on how the proposed project might influence or change what is already being planned.

10.1.2 Environmental Consequences

The relative amount of development in the study area is anticipated to be the same no matter what alternative (Alternative A, B, C, D or the No-Build) is chosen as the preferred alternative. However, the construction of any of the four Build Alternatives could result in the planned growth already identified by the communities to occur in a slightly different configuration than currently identified. For example, implementation of any of the Build Alternatives could result in commercial development occurring in the vicinity of local access to the new interregional connection, rather than at some other location in the community. Land located near the local interchanges associated with Alternatives B and C, would also likely be viewed as attractive locations for commercial and residential development as the land would be more accessible to the new interregional connection, TH 10 and I-94. The area south of the I-94/interregional connection interchange at Alternative B would also be viewed as an attractive location for development as this area would be accessible from I-94 and the interregional connection. Similarly, the area north of the Alternative D/TH 25/TH 10 interchange would have improved access to the interregional system and be more attractive for development. The land in the vicinity of the I-94/interregional connection interchange associated with Alternatives A, C and D, would not be directly accessible from I-94 or the interregional connection and would thus not likely be viewed as attractive for development. The same is true for land in the vicinity of the TH 10/interregional connection interchange associated with Alternatives A, B and C, as these areas would not be directly accessible from TH 10 or the interregional connection.

As discussed in this chapter's introduction, secondary impacts can result in changes to local patterns of land use, which in turn can result in secondary impacts to local natural resources (i.e., wildlife, wetlands, farmland, etc.). As discussed in the previous paragraph, land adjacent to the local interchanges associated with Alternative B and C, the I-94/interregional connection interchange at Alternative B and the Alternative D/TH 25/TH 10 interchange could become more attractive for development as a result of increased access to those areas. These areas have been reviewed to determine if there are any sensitive natural resources in the vicinity of these interchanges that could be affected by "higher density" development. No sensitive natural resources areas were identified that would be impacted by these secondary impacts.

The Build Alternatives could also affect the timing of the communities' planned development. If the proposed development is not already in place by the time the proposed project is constructed, the construction of the project could accelerate the timing of development in the immediate vicinity of access points to the system.

10.1.3 Mitigation

Local governments have the authority to avoid, minimize and mitigate secondary impacts to land use. Through their local land use plans, local governments can guide where development will be allowed and where land should be preserved. Local governments also retain control over the intensity and type of development through exercise of their zoning and subdivision regulatory authority.

Local governments have the authority and responsibility for making land use decisions in the study area and have several tools in place that if implemented would minimize secondary impacts to land use. As such, the I-94/TH 10 Interregional Connection improvements are not anticipated to substantially influence the type, intensity or location of development over what is already planned for and expected to occur with or without the proposed improvements.

Although no sensitive natural resources were identified as likely to experience secondary impacts as a result of land use changes that may result from the I-94/TH 10 Interregional Connection project, there are several regulations, permitting and approval processes in place that emphasize minimization of development impacts, including:

- Minnesota Environmental Quality Board regulations, which require environmental analysis and documentation for larger projects (e.g., residential and commercial developments).
- State and federal wetland permits and approvals, including:
 - MnDNR Public Waters Permit
 - MPCA Clean Water Act 401 Certification
 - U.S. Army Corps of Engineers Section 404 Permit
- MPCA NPDES Construction Permit

10.2 SECONDARY IMPACTS OF I-94 AND TH 10 SYSTEM IMPROVEMENTS

10.2.1 Affected Environment

As described in Chapters 2 and 4, IRC management/improvement plans have been prepared by Mn/DOT for the I-94 and TH 10 corridors in the study area. These plans indicate that I-94 is planned to be converted to a six-lane facility from the TH 25 interchange in Monticello north to the location of the interregional connection interchange (either A, B, C or D). For the No-Build Alternative, the six-lane section on I-94 would extend north to the existing TH 24 interchange. The TH 10 corridor would be converted to a four-lane freeway from the interregional connection (either A, B, C or D)—or for No-Build, from north of the existing TH 24 intersection at TH 10—north through St. Cloud, with local access interchanges on TH 10 at locations identified in the TH 10 corridor study (or in the case of Alternative D, based on input from TAC representatives). Although the I-94 and TH 10 corridor plans identify concepts for these IRC corridors, the I-94/TH 10 Interregional Connection alternatives (No-Build and Build) would each result in different needed improvements to I-94 and TH 10 to conform to the IRC visions for these two highways (see Figures 4.1 through 4.1-D), resulting in different system construction costs and environmental impacts. Thus, although the I-94 and TH 10 corridor improvements are considered separate independent projects, these fiscal and environmental impacts could be considered as secondary impacts resulting from the proposed I-94/TH 10 Interregional Connection project.

10.2.2 Environmental Consequences

10.2.2.1 Fiscal Impacts

The I-94 and TH 10 system improvement construction costs would be considered ‘secondary’ to the costs for construction of each of the four Build Alternatives, since they would be implemented as independent improvement projects for the I-94 and TH 10 corridors. However, since these regional system costs would vary among DEIS Alternatives (Build and No-Build), an estimate of the relative costs for the regional system improvements was developed to allow for comparison of overall system costs among the DEIS Alternatives. Table 4.5 in Chapter 4 summarizes the regional system costs for each alternative. This table also includes the construction cost of each of the I-94/TH 10 Interregional Connection alternatives.

10.2.2.2 Environmental Impacts

Detailed study of the I-94 and TH 10 corridor improvements will be performed during separate environmental documentation as each improvement project is proposed for implementation. However, in order to make an “order of magnitude” estimate of the potential secondary impacts resulting from these future improvements for each of the alternatives under study in this DEIS (Build and No-Build), this section includes a general environmental analysis of the anticipated “footprint” areas for these improvements. The corridor improvements identified for I-94 are anticipated to occur within the highway’s existing right of way, thus there was no need to analyze the environmental impacts of these roadway improvements. The analysis of impacts along the TH 10 corridor assumed that the TH 10 system improvements shown in Table 10.1 and in Figures 4.1 through 4.1-D would be associated with each DEIS alternative.

**TABLE 10.1
TH 10 SYSTEM IMPROVEMENTS ASSUMED FOR SECONDARY IMPACTS
ASSESSMENT**

Roadway Improvements	DEIS Alternative				
	No-Build	A	B	C	D
Miles of new frontage road	15	13	15	15	21
Number of new interchanges	3	2	3	3	5

The list of resources to be assessed as part of the secondary impact analysis included those most directly affected by the TH 10 improvements, including: right of way acquisition, farmland, wetlands, threatened/endangered species, Section 4(f)/6(f) properties, cultural resources, access and land use.

Right of Way Acquisition, Farmland and Wetland Impacts

The TH 10 corridor improvements associated with each of the DEIS alternatives would result in varying amounts of additional right of way acquisition. Table 10.2 identifies the estimated total secondary right of way acquisition impacts for TH 10 corridor improvements for each of the DEIS alternatives, as well as the approximate amount of secondary farmland and wetland impacts.

**TABLE 10.2
SECONDARY IMPACTS OF THE TH 10 CORRIDOR IMPROVEMENTS**

Secondary Impacts (acres) ⁽¹⁾	DEIS Alternative				
	No-Build	A	B	C	D
Right of way acquisition	372	285	372	372	572
Wetlands	23	28	23	23	33
Farmland ⁽²⁾	349	257	349	349	539

⁽¹⁾ Includes only secondary impacts, therefore, this calculation does not include the impacts of the proposed I-94/TH 10 Interregional Connection.

⁽²⁾ For this level of analysis, land uses that were not wetland were assumed to be farmland.

Threatened/Endangered Species Impacts

The planned TH 10 corridor improvements area was reviewed for the presence of listed federal and state threatened and endangered species. The bald eagle (*Haliaeetus leucocephalus*) and the gray wolf (*Canis lupus*) are identified as federally-listed threatened species within Sherburne County (which encompasses the TH 10 corridor). The habitat for the bald eagle is identified as mature forest near water and the habitat for the gray wolf is identified as northern forested areas. As neither of these habitats is located along the TH 10 corridor, no impacts to these federally-listed species are anticipated as a result of the TH 10 corridor improvements.

The MnDNR Natural Heritage database was reviewed for state-listed threatened and endangered species along the TH 10 corridor. The loggerhead shrike (*Lanius ludovicianus*) is identified as a state-listed threatened species in the vicinity of the study area. It is unknown at this time whether or not the proposed improvements would impact the loggerhead shrike. The study area would need to be reviewed/surveyed prior to final design and construction to see if this species is located within the proposed roadway improvement areas. If the species is identified within the vicinity of the proposed improvements, Mn/DOT would work with the MnDNR to establish appropriate avoidance, minimization and mitigation measures.

Section 4(f)/6(f) and Cultural Resources Impacts

Impacts to Section 4(f)/6(f) properties and cultural resources were also considered as part of the secondary impacts analysis. The Sand Prairie Wildlife Management Area is the only possible Section 4(f) property within the study area that would be impacted by the planned TH 10 corridor improvements. As shown in Figure 6.4-A, this property is located at the northern

end of the study area and is east of TH 10. A portion of this property lies directly adjacent to TH 10 and would be impacted by the construction of a frontage road identified as part of the TH 10 corridor improvements. The frontage road would require approximately 15 acres of land from this property. The same TH 10 corridor improvements have been identified for all of the DEIS alternatives (Build and No-Build Alternatives) for this area. Thus, all of the DEIS alternatives could result in secondary impacts to the Sand Prairie Wildlife Management Area.

It should be noted that there is the potential for structures within the study area to be identified as eligible for listing on the National Register of Historic Places and thus considered to be Section 4(f) properties. Structures along the TH 10 corridor would be investigated in further detail as part of the individual environmental documentation for these improvements to determine if they are eligible for listing on the National Register of Historic Places and if they are in turn considered a Section 4(f) resource. No known Section 6(f) properties were identified within the secondary impacts analysis study area.

Access Impacts

The TH 10 corridor improvements would result in changes in access to and across TH 10 for all the DEIS alternatives as a result of converting TH 10 to a freeway north of the interregional connection, in conformance with the IRC plans. With the TH 10 corridor improvements, all direct access to TH 10 north of the river crossing would be eliminated and consolidated to new interchanges/overpasses. The consolidation of access along TH 10 would help to improve existing safety conditions and decrease delay along the corridor. However, these improvements would also result in access changes for properties and roadways that currently have direct access to/from TH 10. With all of the alternatives (Build and No-Build), the conversion of TH 10 to a freeway facility could create negative impacts for farmers that need to travel back and forth across TH 10 because they farm land on both sides of TH 10; because they live on one side of TH 10 and farm on the other side; or because they need to move farm machinery, fertilizer and/or harvested crops across TH 10.

Of all the DEIS alternatives, including the No-Build, the implementation of Alternative A would result in the fewest changes to existing access along TH 10 as this alternative would result in the shortest segment of TH 10 being converted to a freeway. Alternatives B, C and the No-Build involve the same access impacts along TH 10. Alternative D would result in the greatest amount of access changes to TH 10. For each of the alternatives, the TH 10 system improvements would include the construction of new interchanges/overpasses along TH 10. In addition, all direct access to/from TH 10 between these interchanges would be eliminated and new frontage roads would be constructed to provide existing properties/roadways access to these interchanges and TH 10. Following is a description of the location of the new interchanges/overpasses that would be required as part of the TH 10 system improvements for each alternative.

Alternative A would require the construction of TH 10 system improvements, including two new interchanges along TH 10 – an interchange north of the interregional interchange at approximately CSAH 7 and an interchange south of the interregional interchange at approximately CR 65. Alternatives B, C and the No-Build all involve TH 10 system improvements from St. Cloud to just north of existing TH 24, including the

construction of three new interchanges at approximately CSAH 7, CSAH 3 and CSAH 60. If Alternative D is chosen as the preferred alternative, system improvements to TH 10 would require the construction of five new interchanges at approximately CSAH 7, CSAH 3, CSAH 60, CSAH 20 and 90th Avenue. Trunk Highway 10 system improvements for Alternative D would also include the construction of an overpass at existing TH 24. Based on Clear Lake citizen concerns regarding the negative impacts that would result from the conversion of TH 10 to a freeway facility, including impacts to the city's emergency services crossing TH 10 and impacts to farmers crossing TH 10 to/from the Clear Lake grain elevator, Mn/DOT decided that if Alternative D is chosen as the preferred alternative, a TH 10 overpass at existing TH 24 would be needed as part of the TH 10 system improvements. The proposed overpass would provide safe and more convenient local access across TH 10 for Clear Lake residents.

Land Use Impacts

The construction of the TH 10 interchanges could result in a change in land use development along TH 10. Construction of the TH 10 interchanges could result in planned growth already identified by the communities to occur in a somewhat different configuration than currently planned. Construction of the TH 10 interchanges would result in improved access to the land surrounding these interchanges, which in turn could be viewed as more attractive for development. Conversely, land not adjacent to an interchange may be viewed as less attractive for development.

10.2.3 Mitigation

As discussed previously, separate environmental review and documentation for the I-94 and TH 10 system improvements will be required prior to the implementation of these projects. The environmental documentation for these improvements will identify impacts resulting from the proposed projects, as well as specific mitigation measures to alleviate, minimize or mitigate identified impacts. Further avoidance and minimization of resource impacts for these projects can be identified during the permitting and approval process, including the following permits/approvals:

- MPCA NPDES Construction Permit
- MPCA Clean Water Act 401 Certification
- US Army Corps of Engineers Section 404 Permit
- MnDNR Public Waters Permit
- Minnesota Wetland Conservation Act

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