10.0 INDIRECT IMPACTS

The Council on Environmental Quality (CEQ) regulations (40 CFR 1508.7) distinguish between direct and indirect effects as follows:

- Direct effects are caused by an action and occur at the same time and place as the action.
- Indirect effects, sometimes referred to as secondary impacts, are reasonably foreseeable effects caused by the action that occur later in time or farther in distance. Indirect 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 FEIS discuss direct impacts resulting from the I-94/TH 10 Interregional Connection Preferred Alternative; this chapter will discuss potential indirect impacts resulting from the proposed project.

The Draft EIS reported the potential for indirect impacts as a result of the proposed project related to the following:

- Impacts of potential land development that may occur at the proposed local access interchange of TH 24 with the Interregional Connection
- Impacts of improvements planned for I-94 and TH 10 that will be completed as separate projects in the future

This chapter will evaluate the potential for indirect impacts due to implementation of the Preferred Alternative.

10.1 AFFECTED ENVIRONMENT

10.1.1 TH 24 Interchange

As identified in the CEQ regulations, indirect impacts may include growth-induced development or a change in land use patterns. Because the proposed project is an Interregional Corridor Connection with only one local access point, it is not expected to induce growth in the study area, and overall growth in the study area is anticipated to remain the same whether or not the project is implemented. Mn/DOT has met with the communities in the project area to review their planned future land use and development trends. As discussed in Chapter 5 of this FEIS (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 Project Area*). These communities have indicated that the projected growth is anticipated with or without the addition of a new river crossing and Interregional Connection. None of the communities indicated an intent to reduce growth if the proposed project was not implemented.

10.1.2 I-94 and TH 10 Improvements

As described in Chapters 2 and 4 of this FEIS, IRC management/improvement plans have been prepared by Mn/DOT for the I-94 and TH 10 corridors in the project 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 proposed Interregional Corridor Connection (proposed project that is the subject of this FEIS). The TH 10 corridor will be converted to a four-lane freeway from the proposed Interregional Corridor Connection north through St. Cloud, with local access interchanges on TH 10 at locations identified in the TH 10 corridor study. The I-94 and TH 10 corridor plans identify concepts for these IRC corridors without identifying the location of the Interregional Connection. While the termini of future improvements on I-94 and TH 10 will be affected by the location of the Interregional Connection, these improvements will be needed regardless of where the Interregional Connection is constructed. Furthermore, if an Interregional Connection is not built between I-94 and TH 10, then the improvements to these roadways would be linked to the existing alignment of TH 24. Therefore, the future improvements to I-94 and TH 10 are considered separate and independent projects and will undergo independent environmental reviews as individual improvements are undertaken on these corridors.

10.2 ENVIRONMENTAL CONSEQUENCES

10.2.1 TH 24 Interchange

The relative amount of development in the project area has been anticipated to be the same regardless of whether the Interregional Corridor is implemented. However, the construction of the TH 24 local access interchange (proposed as part of the Preferred Alternative) could result in the planned growth to occur in a slightly different configuration than previously anticipated. For example, implementation of the Preferred Alternative could result in commercial development occurring in the vicinity of the TH 24 local access interchange, rather than at some other location in the community. The Preferred Alternative could also affect the timing of communities' planned development. If proposed developments are not in place by the time the proposed project is constructed, the construction of the Preferred Alternative could accelerate the timing of development in the immediate vicinity of the local access interchange at TH 24. The land in the vicinity of the interchanges with I-94 and TH 10 will not be directly accessible from the Interregional Connection, I-94 or TH 10 so this land would not likely be viewed as more attractive for development.

Based upon discussions with the affected communities, local land use controls are considered adequate to manage any potential development in the TH 24 interchange area. The community is very supportive of a local access interchange at the proposed location as it is needed for provision of emergency services. In addition, this interchange will provide convenient access to the downtown areas of Clearwater and Clear Lake, thus reducing circuity for local trips needing to access the Interregional Connection. Therefore, no substantial or adverse indirect impacts are anticipated due to the TH 24 local access interchange construction.

10.2.2 I-94 and TH 10 Improvements

Because the future I-94 and TH 10 improvement projects are independent of the proposed Interregional Connection, no indirect impacts are anticipated for this project. The DEIS reviewed potential impacts of the I-94 and TH 10 corridor improvements for the purposes of comparing the four corridor alternatives and the No-Build Alternative. Since each of the four corridor alternatives would connect to I-94 and TH 10 at different locations, the length and costs of these improvements varied for each alternative. These inputs were included in the overall benefit cost analysis of the alternatives. The Preferred Alternative (DEIS Alternative C) was the most efficient alternative with respect to generating benefits and minimizing costs and impacts.

Any impacts of these separate actions are not seen as "indirect impacts;" rather, they are addressed as part of the cumulative impacts associated with the project (see Chapter 11 of this FEIS). Detailed study of the I-94 and TH 10 corridor improvements will be performed as part of separate environmental documentation processes when each improvement project is proposed for implementation.

10.3 MITIGATION

Local governments have the ability to control development impacts through their local land use plans. They 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 project area and have several tools in place that, if implemented, would minimize indirect impacts to land use. While implementation of the Preferred Alternative is not anticipated to substantially influence the type, intensity or location of most development, ongoing local planning efforts are being updated to reflect its implementation. As discussed in Section 5.2 of this FEIS, the City of Clearwater's 1999 Land Use Plan encourages development of highway service and local/regional businesses along TH 24 to accommodate potential changes associated with the Preferred Alternative's bypass of the downtown business district. Both the Cities of Clear Lake and Clearwater are currently updating their Comprehensive Plans; these updates will reflect the implementation of this proposed project.

In addition to local land use controls, 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
  - Minnesota Wetland Conservation Act
  - MPCA Clean Water Act 401 Certification
  - U.S. Army Corps of Engineers Section 404 Permit
- MPCA NPDES Construction Permit

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