FEDERAL HIGHWAY ADMINISTRATION

FINDING OF NO SIGNIFICANT IMPACT

For

IOWA 58
FROM U.S. 20 TO GREENHILL ROAD

NHSX-U-58-1(91)--8S-09

CEDAR FALLS, BLACK HAWK COUNTY, IOWA

The FHWA has determined that this project will not have any significant impact on the human and natural environment. This Finding of No Significant Impact (FONSI) is based on the attached Environmental Assessment which has been independently evaluated by the FHWA and determined to adequately and accurately discuss the need, environmental issues, impacts of the proposed project and appropriate mitigation measures. It provides sufficient evidence and analysis for determining that an Environmental Impact Statement is not required. The FHWA takes full responsibility for the accuracy, scope and content of the attached Environmental Assessment.

1/25/16
Date

Michael LaPietra
For FHWA

DESCRIPTION OF THE PROPOSED ACTION

The Proposed Action consists of the improvement of Iowa Highway 58 (IA 58) from U.S. Highway 20 (U.S. 20) north to Greenhill Road in Cedar Falls (Black Hawk County, Iowa). The improvement would include limiting at-grade access to IA 58 by adding one or more interchanges to the corridor which would be located at Viking Road, Greenhill Road, and reconfiguring the U.S. 20 interchange. In order to construct these interchanges and associated ramps, the pavement of IA 58 would be reconstructed. In a couple of locations, the alignment of IA 58 would be shifted slightly.

U.S. 20

With future traffic projections, it is anticipated that a system interchange will be needed to efficiently accommodate forecasted traffic volumes. This system interchange would also provide vehicle access to at-grade properties and Ridgeway Avenue. This interchange would be constructed in the future when traffic and funding warrants so in the meantime, interim improvements are proposed. The interim improvements at Ridgeway Avenue propose to add dual left-turn lanes for IA 58 southbound and northbound traffic. A designated right-turn lane would be added on IA 58 north of Ridgeway Avenue. Portions of IA 58 would be reconstructed to add these turn lanes.

Another proposed interim improvement would be at the U.S. 20 interchange. One of the heaviest traffic patterns is from IA 58 southbound to U.S. 20 eastbound. Therefore, it is proposed to add dual turn lanes from IA 58 onto the eastbound U.S. 20 entrance ramp and construct a two-lane entrance ramp onto U.S. 20. The attached Environmental Assessment (EA) provides more description and maps of the proposed improvements.

Viking Road

The Preferred Alternative for this location is a single point interchange, with IA 58 traveling under Viking Road. One new bridge on Viking Road would be necessary as part of the interchange. A slight shift to the east in the IA 58 alignment would occur near Viking Road.

Viking Road would be reconstructed west of Nordic Drive to east of Andrea Drive. Dual left-turn lanes would be added as well as right-turn lanes to accommodate traffic. Dual turn lanes would be added on Viking Road at Andrea Drive. A portion of Andrea Drive would be reconstructed to add turn lanes north and south of the intersection with Viking Road. Maps and more detail regarding the Viking Road interchange is in the attached EA.

Greenhill Road

The Preferred Alternative for this location is a single point interchange, with IA 58 traveling over Greenhill Road. This interchange would require two new bridges on

IA 58. Right- and left-turn lanes would be added on Greenhill Road. IA 58 mainline would be reconstructed through this area in order to go over Greenhill Road and match grade with the interchange ramps. More information and maps of this interchange area are in the attached EA.

NOTICE OF ENVIRONMENTAL ASSESSMENT AVAILABILITY

Notification of the availability of the Environmental Assessment (EA) was forwarded to local, state and federal agencies on September 16, 2015. Notice for availability of the EA was published on September 30, 2015, in the Waterloo-Cedar Falls Courier newspaper. Advertisement of public hearing was published in the Waterloo-Cedar Falls Courier newspaper on October 23, 2015. Notice of the public hearing was also included on the Iowa DOT website at www.iowadot.gov/pim and the city of Cedar Falls website at: www.cedarfalls.com.

PUBLIC HEARING SUMMARY AND COMMENT PERIOD

A Public Hearing was held for this project on October 27, 2015, in Cedar Falls, Iowa. There were 84 persons present at the October 27, 2015, Public Hearing held at the Cedar Falls Public Works Building. Displays of the EA graphics, including the Preferred Alternative at each intersection, were available for viewing. The hearing began with an open forum session where attendees could ask questions and express concerns and was followed by a formal presentation in which several persons had questions and comments. There were three comment letters left during the hearing, and eleven letters were received following the hearing. Closing date for comments on the Public Hearing and EA was November 12, 2015.

A transcript of the hearing has been prepared and forwarded to the Federal Highway Administration (FHWA). The transcript, which is a separate written document, is available to anyone by request through the Iowa DOT Office of Location and Environment, Public Hearing Section.

AGENCY COMMENTS

Two agencies responded to the EA notification and distribution. Letters from the Environmental Protection Agency and Iowa Department of Natural Resources appear in Appendix A of this Finding of No Significant Impact. Responses to these agency comments are shown in Table 1 below.

TABLE 1
SUMMARY OF AGENCY COMMENTS

Date	Agency and Comment	Response
September 22, 2015	**Iowa Department of Natural Resources** • No state or federal funds were used at parks in the vicinity of the project.	• No Response Necessary

Date	Agency and Comment	Response
November 4, 2015	**U.S. Environmental Protection Agency** • The EA did not consider greenhouse gas (GHG) emissions and how the preferred alternative might improve or degrade air quality.	• One of the problems the IA 58 Corridor Project is to solve is traffic congestion. Long queues cause traffic to idle waiting for signal changes. Although Iowa is in attainment from an air quality standpoint, the addition of interchanges on this corridor will reduce the amount of idling traffic by allowing through traffic to travel unimpeded and local traffic to have shorter wait times at signals. From a GHG standpoint, traffic will be moving through the corridor more efficiently, which should help with fuel efficiency. Further, this project is improving an existing facility so that very minor amounts of right-of-way would be acquired that are not already developed. Only minimal impacts to undeveloped land are anticipated. The efficiency of the traveling public should offset the removal of any carbon sinks (such as trees or other vegetation) within this project.

CHANGES FOLLOWING PUBLICATION OF THE EA

Noise

Following publication of the EA, it was determined that the truck traffic percentage of 2 percent used in the noise analysis was too low, and that 5 percent trucks better reflects current and future traffic conditions. Therefore, the noise analysis was rerun using 5 percent trucks.

Additional information on the noise analysis method and the Iowa DOT Noise Policy is presented in the attached EA. Noise levels were predicted using the Federal Highway Administration Traffic Noise Model (TNM) software, version 2.5, for 2013 Existing Conditions and 2040 No-Build and Build Conditions for the same 83 representative receptors used in the EA.

Table 2 lists the predicted noise levels obtained from the reanalysis using 5 percent trucks. Receptors in which there is a noise impact are shown in dark shaded boxes. The differences between the noise levels presented in the EA and those in the reanalysis using 5 percent trucks presented in Table 2 never exceed two decibels, with the analysis using 5 percent trucks generally being slightly noisier.

TABLE 2
PREDICTED NOISE LEVELS, USING 5% TRUCKS

Receptor	NAC	Existing (2013) Noise Level	Predicted No-Build (2040) Noise Level	Difference Between Existing and No-Build	Build Condition Design Year (2040) Noise Levels	Difference Between Existing and Build Condition Noise Levels
Greenhill Road Interchange Area						
R01	66	55	57	2	61	6
R02	66	55	57	2	62	7
R03	66	55	57	2	62	7
R04	66	55	57	2	62	7
R05	66	55	57	2	62	7
R06	66	55	58	3	62	7
R07	66	55	57	2	62	7
R08	66	56	58	2	62	6
R09	66	56	58	2	62	6
R10	66	56	59	3	62	6
R11	66	56	59	3	62	6
R12	66	57	59	2	62	5
R13	66	58	60	2	62	4
R14	66	59	61	2	62	3
R15	66	59	61	2	62	3
R16	66	59	62	3	62	3
R17	66	60	62	2	63	3
R18	66	61	63	2	63	2
R19	66	63	65	2	65	2
R20	66	64	66	2	66	2
R21	66	65	67	2	67	2
R22	66	66	68	2	68	2
R23	66	67	69	2	69	2
R24	66	65	67	2	67	2
Q1	66	57	60	3	60	3
Q2	66	58	60	2	61	3
Q3	66	59	61	2	61	2
Q4	66	59	61	2	61	2
Q5	66	60	62	2	62	2
Q6	66	60	62	2	62	2
Q7	66	60	62	2	62	2
Q8	66	59	62	3	62	3
Q9	66	60	62	2	62	2

Receptor	NAC	Existing (2013) Noise Level	Predicted No-Build (2040) Noise Level	Difference Between Existing and No-Build	Build Condition Design Year (2040) Noise Levels	Difference Between Existing and Build Condition Noise Levels
Cedar Prairie Trail						
CP1	66	57	60	3	62	5
CP2	66	55	58	3	62	7
CP3	66	57	59	2	63	6
CP4	66	58	60	2	61	3
CP5	66	60	62	2	63	3
El Dorado Heights Park						
EH1	66	60	62	2	64	4
EH2	66	57	59	2	64	7
EH3	66	56	59	3	64	8
EH4	66	56	59	3	64	8
EH5	66	56	58	2	64	8
EH6	66	56	59	3	64	8
EH7	66	56	59	3	63	7
Begin Viking Road Interchange Area						
R25	66	59	61	2	61	2
R26	66	59	61	2	61	2
R27	66	59	62	3	62	3
R28	66	59	61	2	61	2
R29	66	58	60	2	60	2
R30	71	64	66	2	66	2
R31	71	65	67	2	67	2
R32	71	66	68	2	68	2
R33	71	67	69	2	69	2
R34	71	66	68	2	68	2
R35	71	66	68	2	68	2
R36	71	66	68	2	68	2
R37	71	64	67	3	66	2
R38	66	63	66	3	67	4
R39	71	66	68	2	67	1
R40	71	60	62	2	63	3
R41	71	64	66	2	66	2
R42	71	65	68	3	66	1
R43	71	67	69	2	70	3
R44	71	64	66	2	65	1
R45	71	67	69	2	69	2
R46	71	66	69	3	69	3

Receptor	NAC	Existing (2013) Noise Level	Predicted No-Build (2040) Noise Level	Difference Between Existing and No-Build	Build Condition Design Year (2040) Noise Levels	Difference Between Existing and Build Condition Noise Levels
R47	71	64	68	4	66	2
R48	71	60	63	3	62	2
R49	71	59	62	3	62	3
R50	71	63	66	3	66	3
R51	71	67	70	3	70	3
End Viking Road Interchange Area						
R52	71	53	56	3	56	3
R53	71	60	63	3	58	-2
R54	66	62	65	3	59	-3
R55	71	61	64	3	61	0
R56	66	59	62	3	64	5
R57	66	60	63	3	63	3
R58	71	61	64	3	61	0
R59	66	56	57	1	58	2
R60	66	59	61	2	65	6
R61	66	56	59	3	60	4
R62	66	54	56	2	58	4

Existing Conditions

Using the 5 percent truck standard, two existing condition receptors approach the Noise Abatement Criteria (NAC) and are considered to be impacted as defined by Iowa DOT's Traffic Noise Policy. This represents an increase of one impacted receptor over the 2 percent trucks scenario.

No Build Alternative

Using the 5 percent truck standard, under the No Build Alternative, noise levels in 2040 are predicted to be approximately 1 to 4 dBA higher than the existing noise levels. Of the 83 sensitive receivers in the Study Area, five residential properties, one park/picnic area, and no businesses would approach or exceed the NAC under the No Build Alternative. No receptors would experience a substantial increase (defined by the Iowa DOT Traffic Noise Policy as an increase of at least 10 dBA over existing conditions) in highway traffic noise under this alternative. Under Iowa DOT's Traffic Noise Policy, only the five residences and one park/picnic area are considered to be impacted, an increase of two impacted receptors over the 2 percent trucks scenario.

Preferred Alternative

Using the 5 percent truck standard, under the Preferred Alternative, noise levels in 2040 using 5 percent trucks are predicted to range between -3 dBA lower and 8 dBA higher than the existing noise levels. Of the sensitive receivers in the Study Area, five residential properties, one park/picnic area, and no businesses would approach or exceed the NAC under the Preferred Alternative. No receptors would experience a substantial increase (defined by the Iowa DOT Traffic Noise Policy as an increase of at least 10 dBA over existing conditions) in highway traffic noise under this alternative. Under Iowa DOT's Traffic Noise Policy, five residences and one park/picnic area are considered to be impacted, an increase of two impacted receptors over the 2 percent trucks scenario.

Noise Abatement

According to the Iowa DOT Traffic Noise Policy, noise abatement must be considered and evaluated for feasibility and reasonableness if traffic noise impacts are identified. For this reason, noise barriers were evaluated for the Build scenario to determine if noise levels could be "feasibly" and "reasonably" reduced. The concepts of feasibility and reasonableness are discussed in the Iowa DOT Traffic Noise Policy.

Two noise barriers were modeled in TNM attempting to reduce noise levels at impacted receptors: 1) using a noise wall to provide a 750-foot southerly extension of the existing noise berm at the north end of the project; and 2) a 1,450-foot noise wall to protect a small park and picnic area located at the end of South Main Street. The analyses for these barriers were run assuming 5 percent trucks.

In the case of the northern barrier (Barrier #1), it was determined that not enough space was present to extend the berm itself south. For this reason, a noise wall was used to extend the berm south to the approximate location of the existing Cedar Falls Mayors Pedestrian Bridge. In addition to the five impacted noise receivers in this area (Receivers R20 through R24), ten (10) additional other receivers, not considered impacted by noise under Iowa DOT's Noise Traffic Policy, were included in the barrier analysis to determine if they would receive a significant noise reduction as a result of noise wall construction.

In the case of the southern barrier (Barrier #2), it was determined that, based on a park frontage length of approximately 350 feet and a residential frontage length of approximately 85 feet (typical for residences located near the park), four receivers would be required to adequately represent noise levels in the park for the purpose of a barrier analysis. All four receivers would be impacted under the Preferred Alternative.

The noise barrier analyses presented in Tables 3 and 4 show that each of the proposed barriers were somewhat effective in providing significant noise reduction; i.e., at least a +5 dBA reduction for a majority of impacted receptors.

TABLE 3
BARRIER ANALYSIS #1:
BERM EXTENDED WITH WALL, USING 5% TRUCKS,
SE QUADRANT OF GREENHILL/IA 58 INTERSECTION

	Barrier Height, Ft.						
	10	12	14	16	18	20	22
Noise Reduction, dBA							
R19	0	1	2	3	4	4	5
R20	1	2	3	5	6	6	7
R21	2	3	5	6	7	8	9
R22	3	4	6	8	8	9	***10***
R23	4	5	7	8	9	***10***	***10***
R24	1	3	4	5	6	6	6
Q1	0	0	0	0	1	1	2
Q2	0	0	1	1	2	3	3
Q3	0	0	1	1	2	3	3
Q4	0	0	1	2	3	3	4
Q5	0	1	2	2	4	4	5
Q6	0	1	2	2	4	4	4
Q7	0	1	2	2	4	4	4
Q8	0	1	2	2	3	3	4
Q9	0	1	1	1	2	2	2
Total Barrier Cost	$187,557	$225,067	$262,580	$300,093	$337,604	$375,116	$412,627
No. Benefited Receptors	0	1	3	5	5	5	7
Cost/Ben. Receptor	**#N/A**	**$225,067**	**$87,527**	**$60,019**	**$67,521**	**$75,023**	**$58,947**

Notes:

Cost calculations based on a barrier length of 750 feet and a unit cost of $25/Sq Ft.

Benefited receptors shown on dark background.

Receptors meeting design goal shown in bold italics.

TABLE 4
BARRIER ANALYSIS #2:
CITY PARK AT END OF SOUTH MAIN, USING 5% TRUCKS

	Barrier Height, Ft.						
	10	12	14	16	18	20	22
Noise Reduction, dBA							
R38	2	4	5	7	8	***10***	***10***
R38a	4	6	7	9	***10***	***12***	***12***
R38b	3	5	6	8	9	***11***	***11***
R38c	3	5	6	8	9	***11***	***11***
Total Cost	$367,672	$441,206	$514,739	$588,273	$661,807	$735,342	$808,877
No. Benefited Receptors	0	3	4	4	4	4	4
Cost/Ben. Receptor	**#N/A**	**$147,069**	**$128,685**	**$147,068**	**$165,452**	**$183,836**	**$202,219**

Notes:

Cost calculations based on a barrier length of 1,450 feet and a unit cost of $25/Sq Ft.

Benefited receptors shown on dark background.

Receptors meeting design goal shown in bold italics.

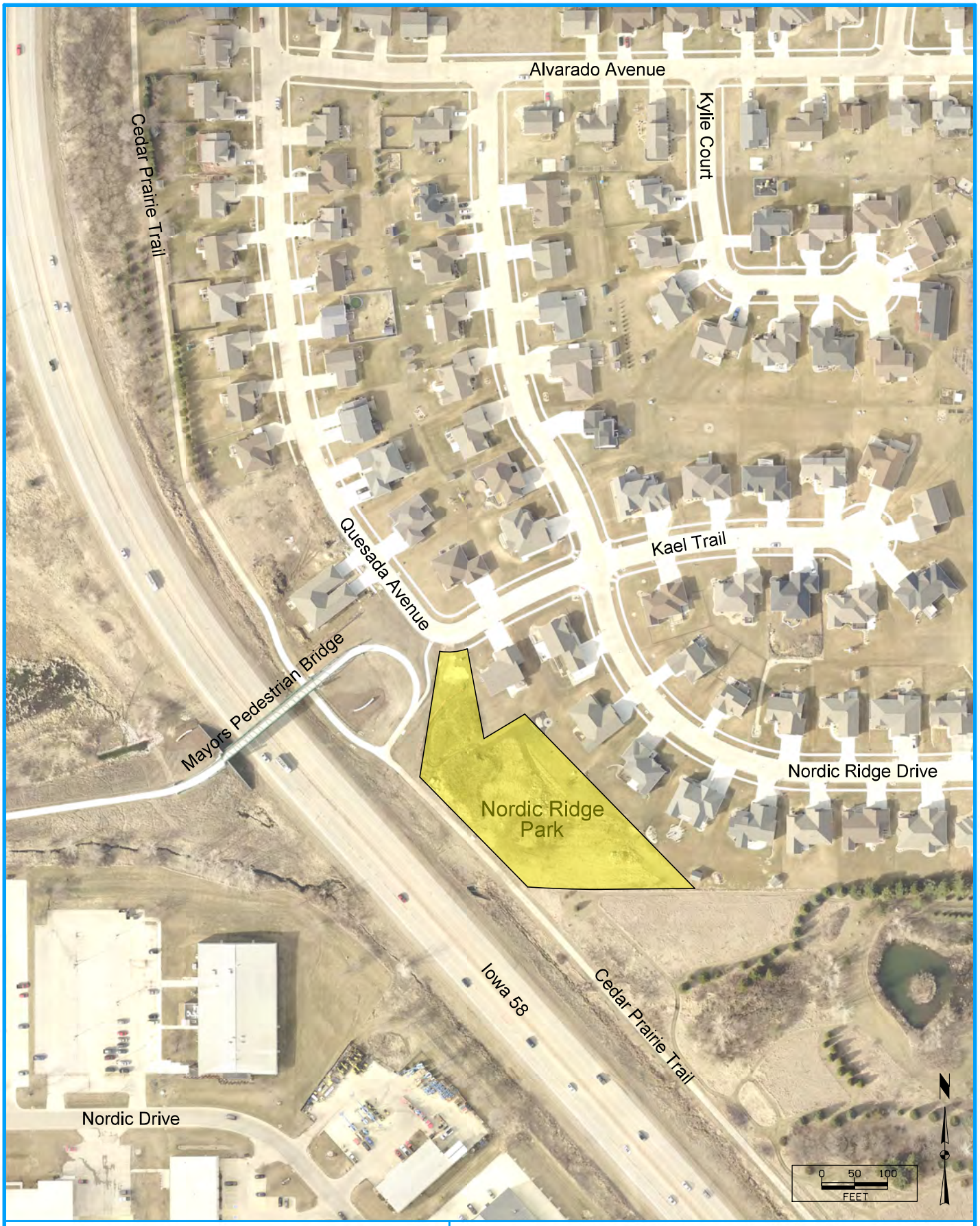
Iowa DOT's noise reduction design goal of 10 dBA for at least one receptor was met for both barrier scenarios. However, the cost of the walls per benefitted receptor exceeded Iowa DOT's cost criteria of $40,000 per benefitted receptor in both cases. Based on the noise analysis performed, there appears to be no feasible and reasonable solutions available to mitigate the noise impacts at the locations identified. Therefore, noise barriers are not recommended for any of the receivers.

Parks

Since completion of the EA, the city has developed an additional park in the vicinity of the project. This new park, Nordic Ridge Park, is 1.53 acres in size and is located just south of the Mayors Pedestrian Bridge on the east side of IA 58 (Figure 1). The park will offer a 16-stall parking lot, restroom, shelter with picnic tables, Cedar Prairie Trail access, security lighting and landscaping. Although it is adjacent to IA 58, it will not be impacted by the roadway construction.

Wildlife and Habitat

Iowa Department of Natural Resources (DNR) responded to an early coordination request with a letter dated November 14, 2014, which was inadvertently left out of the EA. This letter appears in Appendix A. Three species were listed in the DNR letter, including Sweet Indian Plantain (*Cacalia suaveolens*) - state Threatened; Glade Mallow (*Napaea dioica*) - state Special Concern; and Blanding's Turtle (*Emydoidea blandingii*) - state Threatened. A review conducted by qualified biologists (in June 2013 and July 2014) determined there is very limited habitat for Blanding's Turtle and would be



AECOM

Figure 1
Location of Nordic Ridge Park
IA 58 Improvement Corridor
Cedar Falls, Iowa

DECEMBER 2015

Black Hawk County, Iowa
Finding of No Significant Impact

60287018

unlikely to be present so near a highway such as IA 58. Some habitat is present near the IA 58/Greenhill Road intersection that could support the two plant species: Sweet Indian Plantain and Glade Mallow. The preferred alternative at this intersection is a single-point interchange. This interchange type uses minimal right-of-way and, at this time, no impact to potential habitat that could support these species is anticipated.

The Northern Long-Eared Bat (*Myotis septentrionalis*) is a recently protected species. Suitable summer habitat for this species is found along Dry Run Creek on the west side of IA 58. Any tree clearing will need to occur between October 1st and March 31st to avoid impact to them. At this time, it is not anticipated there will be a need for significant tree clearing.

BASIS FOR FINDING OF NO SIGNIFICANT IMPACT (FONSI)

This FONSI documents compliance with NEPA and all other applicable environmental laws, Executive Orders and related requirements.

SPECIAL CONDITIONS ASSOCIATED WITH LOCATION APPROVAL

Right-of-Way

During final design, every effort will be made to minimize the amount of right-of-way needed from adjacent landowners to construct the project. Any relocations or land acquisitions will be made in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended.

Noise Mitigation

Although noise walls are not reasonable, during final design, the city of Cedar Falls and Iowa DOT will consider methods to reduce tire/pavement noise on IA 58 to adjacent properties. Utilizing longitudinal grooving on the pavement may help reduce noise and will be analyzed for use on this project.

Permitting and Approvals

Construction of the project will involve routine permitting. A National Pollutant Discharge Elimination System (NPDES) permit will be obtained during final design of the project. Also, a Section 404 permit will be required for wetland impacts. For any trees to be cleared near Dry Run Creek, they will need to be removed between October 1st and March 31st to avoid impact to Long-eared Bat summer habitat.

Appendix A
Agency Comment Letters

Letters Received in Response to EA:

- Environmental Protection Agency
- Iowa DNR / Budget & Finance Bureau

Letter Omitted From EA:

- Iowa DNR Conservation and Recreation Division

Letters Received in Response to EA

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
11201 Renner Boulevard
Lenexa, Kansas 66219

NOV 4 2015

Ms. Brenda Durbahn, MA
Transportation Planner
AECOM
501 Sycamore Street, Suite 222
Waterloo, Iowa 50703

Dear Ms. Durbahn:

The U.S. Environmental Protection Agency, Region 7, has reviewed the Draft Environmental Assessment prepared by the U.S. Department of Transportation Federal Highway Administration and Iowa Department of Transportation. In accordance with our responsibilities under Section 309 of the Clean Air Act, the National Environmental Policy Act, and the Council on Environmental Quality regulations for implementing NEPA, EPA is providing the following comments:

COUNCIL ON ENVIRONMENTAL QUALITY (CEQ) DRAFT GUIDANCE ON CLIMATE CHANGE DEC 2014: The document does not consider GHG emissions and how the preferred alternative might improve or degrade air quality. EPA recommends calculating to determine whether or not improvements would be made to air quality based on an improved route/interchange access. Information on how to comply with the President and CEQ can be found here: https://www.whitehouse.gov/administration/eop/ceq/initiatives/nepa/ghg-guidance.

In Appendix A, under the Natural Environment Impacts Section, there is reference to Air Quality and it says the project will have no impacts. Unfortunately, there is no discussion in the document that warrants a conclusion of impacts positively or negatively. EPA recommends including an air quality discussion to show how the document arrives at no impacts.

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DIRECT EFFECTS 1502.16(a): There was no air discussion. See paragraph above.

CUMULATIVE IMPACTS 1508.7: There was no air discussion. See paragraph above.

We look forward to continuing working with you on this project. If you have questions, please call me at 913-551-7606, or contact Joe Summerlin at 913-551- 7029 or summerlin.joe@epa.gov.

Sincerely,

Joshua Tapp
Deputy Director
Environmental Sciences and Technology Division

Fields of Opportunities

STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
CHUCK GIPP, DIRECTOR

September 22, 2015

Brenda Durbahn
AECOM
501 Sycamore Street, Suite 222
Waterloo, IA 50703

Re: Iowa 58 Viking Road Corridor Environmental Assessment
Cedar Falls, Black Hawk County, IA
NHSX-U-58-1(91)—8S, AECOM #60287018

Dear Ms. Durbahn:

This letter is in response to your request for informatioin on potential park/recreational impacts associated with an Environmental Assessment (AE) for improvements to Iowa 58 from Greenhill Road south through the Hwy 20 Interchange.

The City of Cedar Falls does not have any parks within the vicinity map that has received either State or Federal funds; therefore, no potential park impacts exist for the EA.

The early coordination process is very helpful to our office and the National Park Service as we both are responsible for ensuring state and federal projects remain in outdoor recreation, and conversions are kept to a minimum.

If you have any questions, please contact me at 515-725-8213.

Sincerely,

Kathleen Moench

Kathleen Moench
Budget & Finance Bureau

Letter Omitted From EA

Fields of Opportunities

STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
CHUCK GIPP, DIRECTOR

November 14, 2014

AECOM
Attn: Brenda Durbahn
501 Sycamore Street, Suite 222
Waterloo, IA 50703

RE: Environmental Review for Natural Resources
Iowa 58/Viking Road Corridor Study
Project No. NHSX-U-58-1(91)—8S-07
AECOM Project No. 60287018
Black Hawk County

Dear Ms. Durbahn:

Thank you for inviting Department comment on the impact of this project. The Department has reviewed the Environmental Resources Report prepared August, 14, 2014. The habitat assessment indicated potential habitat for the state-Threatened plant, Sweet Indian Plantain (*Cacalia suaveolens*) and state-Special Concern plant Glade Mallow (*Napaea dioica*) in the riparian wetland bisected by Greenhill Road (Wetlands 1 & 5). The DNR concurs with this assessment and recommends that if these areas cannot be avoided during construction, a survey to determine if these species are present should be conducted.

The report also indicates limited suitable habitat for state-Threatened Blanding's Turtle (*Emydoidea blandingii*) in the project corridor; and concludes the likelihood the turtle is using the area is low due to the disturbed urban nature of the area, close proximity to the existing highway, and distance to known populations. The DNR agrees with this assessment that the project has limited potential to adversely impact this species. However, as a precaution, the DNR recommends avoiding impacts to aquatic habitats in the corridor to further minimize potential adverse impacts to this species should it be present.

Limited potential habitat was also reported for three state-Special Concern butterfly species insect species including the Pipevine Swallowtail (*Battus philenor*), the Dion Skipper (Euphyes dion), and the Purplish Copper (*Lycaena helloides*). The DNR agrees with the assessment that the project is not likely potential to impact these species due to the limited potentially suitable habitat in the project area and the highly urban nature of the existing road corridor. As a precaution, the DNR recommends minimizing impacts to wetland habitats in the corridor to further reduce the potential adverse impacts to these species should they be present.

This letter is a record of review for protected species, rare natural communities, state lands and waters in the project area, including review by personnel representing state parks, preserves, recreation areas, fisheries and wildlife but does not include any comment from the Environmental Services Division of this Department. This letter does not constitute a permit. If listed species or rare communities are found during the planning or construction phases, additional studies and/or mitigation may be required. Other permits may be required from the Department or other state or federal agencies before work begins on this project.

Please reference the following DNR Environmental Review/Sovereign Land Program tracking number assigned to this project in all future correspondence related to this project: 8932.

If you have questions about this letter or require further information, please contact me at (515) 281-8967.

Sincerely,

Kelly Poole
Environmental Specialist
Conservation and Recreation Division

FILE COPY: Kelly Poole
Tracking Number: 8932