



**CITY OF SAINT PAUL**  
*Melvin Carter, Mayor*

*25 West Fourth Street  
Saint Paul, MN 55102*

*Telephone: 651-266-6626  
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Date: November 18, 2019  
To: Heritage Preservation Commission  
From: George Gause  
Re: Consultation and Comment for Metro Transit Rush Line Bus Rapid Transit Area of Potential Effects (APE)

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### **Background**

The Federal Transit Administration (FTA) in cooperation with Metro Transit and the Metropolitan Council is proposing the Rush Line Bus Rapid Transit (BRT) Project that is a proposed 14-mile bus transit route with stations between Union Depot in Saint Paul and downtown White Bear Lake.

The FTA initiated the consultation process under the regulations for Section 106 of the National Historic Preservation Act (NHPA) on July 1, 2018. The HPC requested consulting party status to participate in the concurrence with the survey and evaluation findings and with the determination of effect, if any, the project will have on National Register of Historic Places (NRHP) properties or those determined to meet the criteria for listing on the NRHP.

The Area of Potential Effect (APE) parameters has been set after consultation with the Advisory Council for Historic Preservation. The HPC has 30 days to comment (November 29<sup>th</sup>, 2019)

### **HERITAGE PRESERVATION COMMISSION COMMENTS**

The HPC serves as an advisory body to the Mayor and City Council on municipal heritage preservation matters. Chapter 73.04(1) states the HPC shall review and comment on plans and studies which relate to the historic and architectural heritage of the city.

### **STAFF RECOMMENDATION**

Heritage Preservation and City staff have concern that more detail has not been show for the three proposed Lowertown platforms. Our last comments to the Minnesota Department of Transportation alerted them that there could be an adverse impact to the historic district.

*Union Depot Station Wacouta Street Platform  
Union Depot Station Sibley Street Platform  
5<sup>th</sup>/6<sup>th</sup> Street Station 5<sup>th</sup> Street Platform*

*The above station platforms could have an adverse impact on Lowertown Historic Local, State and National District and efforts to minimize impacts of the station design should be made.*

- *The size of the station should not to block views in the district.*
- *Station materials and design/ornamentation: metal should have a dark finish, ornamentation should not conflict with the historic character of the district, lighting should be directed downward, signage should be minimal and historically appropriate.*

MDOT responded to our comments:

*The two BRT stations proposed for Lowertown will be built by Gold Line, but will be designed to accommodate both projects. The City has provided input on both stations. The 15% plans are included in the Gold Line Environmental Assessment, which is currently out for public comment (available on the Project website). Moving forward, the forthcoming Gold Line Section 106 Programmatic Agreement requires additional consultation to inform the design.*

### **SUGGESTED MOTION**

I move that the HPC concurs with the Area of Potential Effect submitted for the Rush Line Bus Rapid Transit are reiterate that additional review and consultation will be required for the three proposed Lowertown Historic District platforms for Rush Line and Gold Lined as per presented testimony, submitted documentation and information provided in the staff report.

**Date:** September 27, 2019

**To:** William Wheeler, Federal Transit Administration, Region 5  
Elizabeth Breiseth, Federal Transit Administration, Region 5

**From:** Barbara Howard

**Re: METRO Rush Line Bus Rapid Transit Project Area of Potential Effects Parameters**

### Rush Line Bus Rapid Transit

The Rush Line Bus Rapid Transit (BRT) Project (Project) is a proposed 14-mile transit route between Saint Paul and White Bear Lake. It includes 21 stations that would serve the communities of Saint Paul, Maplewood, Vadnais Heights, Gem Lake, White Bear Township, and White Bear Lake. Approximately 75 to 80 percent of the route will be in dedicated transit lanes or business access and transit (BAT) lanes, with service every 10 minutes during rush hours and every 15 minutes other times. Park-and-rides are proposed as part of the project at the Highway 36, Maplewood Mall Transit Center, and County Road E stations. The analysis and design of this transit route is being led by Ramsey County.

The Project may receive funding from the United States Department of Transportation, Federal Transit Administration (FTA) and, therefore, must comply with the National Environmental Policy Act of 1969, as amended, and Section 306108 (previously and hereinafter referred to as Section 106) of the National Historic Preservation Act (54 United States Code [USC] 300101 et seq.), and its implementing regulations, 36 Code of Federal Regulations [CFR] 800. The Project is also subject to other applicable federal and state mandates such as the Minnesota Historic Sites Act, Minnesota Field Archaeology Act, and Minnesota Private Cemeteries Act.

The FTA has delegated authority to the Minnesota Department of Transportation's (MnDOT) Cultural Resources Unit (CRU) to complete many aspects of the Section 106 process on its behalf for the Project, including preparing Section 106 documentation, analyses, and recommendations to inform FTA determinations. This memorandum has been prepared to help support a draft Area of Potential Effects (APE) for the Project.

### Introduction

Although the information presented within this document is based on parameters previously developed for the Gold Line BRT Project, conversations with FTA and within MnDOT CRU staff suggest several changes from past precedent:

- Based on recent guidance provided by the Advisory Council on Historic Preservation, FTA has delineated a single APE for all project effects rather than two APEs based on the type of property expected to be found or the anticipated effect (i.e., direct or indirect).
- The table outlining the parameters for indirect effects allows for greater discretion in adjusting the APE based on specific project elements and onsite conditions.

We recognize the APE may need to be expanded or contracted as the engineering and design work advances. The parameters outlined below will serve as a starting point for CRU analysis in order to recommend any future APE modifications to FTA.

## Effects Analysis

The Rush Line BRT has the potential for both direct and indirect effects to historic properties resulting from activities associated with BRT construction and operation. Potential physical effects include those related to acquisition, ground-disturbing activities, and alterations to existing properties. Additional direct effects may include vibration, noise, visual effects, and changes in traffic. Indirect effects may include potential development catalyzed near station areas. Each of these potential types of effects is discussed below in relation to project elements.

As part of considering whether there is potential for noise and vibration impacts throughout the corridor, MnDOT CRU has reviewed FTA's screening distances for noise and vibration for busway and BRT projects and for specific bus facilities (*Transit Noise and Vibration Impact Assessment Manual*, September 2018). Due to their rubber tires and suspension systems, buses do not typically cause ground-borne noise or vibration concerns as part of bus operations. Noise analysis conducted to date indicates that potential noise impacts from the operation of the electric bus fleet will be limited to the roadway right-of-way. However, temporary noise and vibration as a result of construction activities is possible, as noted in descriptions, below.

## Running Ways and Guideways

In addition to operating in mixed traffic within existing roadway limits, the Rush Line BRT anticipates operating along new dedicated guideways, on new dedicated transit lanes along existing streets, and along new BAT lanes within existing road rights-of-way.

Bus traffic will operate at speeds ranging from 5 miles per hour (mph) to 50 mph, depending on location and the type of running way in use. In downtown Saint Paul, buses will primarily operate up to 25 mph in mixed traffic and in dedicated transit lanes. Outside of downtown Saint Paul, buses will operate between 25 and 40 mph in areas where they operate in mixed traffic and in dedicated transit lanes. On the dedicated guideways along Phalen Boulevard and within the Ramsey County Regional Railroad Authority (RCRRA) Corridor, buses will operate at speeds up to 45 mph. Finally, along TH 61, buses will operate in BAT lanes and mixed traffic up to the posted speeds of 40-50 mph. The introduction of new bus traffic has been considered throughout, with careful consideration given to areas where bus traffic is operating on new dedicated guideways and where there is a high volume of existing traffic.

Physical effects will be minimal where existing road limits (i.e., curb-to-curb) will incorporate mixed traffic or a dedicated bus lane without extensive construction. Other segments of the corridor may require realignment or minor expansion of the road limits both within and outside of the existing rights-of-way, increasing the limits of disturbance and the potential for temporary construction noise and vibration. The dedicated guideway and a few segments of the corridor where dedicated bus lanes are proposed will require more intense earthmoving and construction activities resulting in temporary noise and vibration. The majority of the dedicated guideway is along the RCRRA Corridor, which has extant fill embankments up to 30 feet above the surrounding ground level in some areas, increasing the potential extent of visual effects. This corridor is the former corridor for the Lake Superior & Mississippi Railroad (LS&M; RA-SPC-6064), portions of which have previously been considered eligible for listing on the National Register of Historic Places.

## Stations

There are 21 stations proposed along the route, including modifications to two existing stations. In addition to the physical effects of ground disturbance and the temporary noise and vibration effects associated with proposed construction, BRT stations will introduce new elements along the project corridor visible to properties within sight lines of these facilities. New stations will typically include one or two platform(s), which are anticipated to be 80 to 100 feet long, with 60-foot platforms in some locations due to site constraints. Typical stations also include off-board fare collection, above-ground shelters, wheelchair ramps, and amenities such as lighting, benches, bike racks, trash receptacles, security systems, and signage. The Project team is working with communities to determine whether additional amenities are desired and can be incorporated into the Project design. These may include designated vehicle drop-off/pick-up zones, bicycle lockers and tune-up stations, landscaping, and other design features. Modifications to existing platforms are proposed at the Maplewood Mall Transit Center (opened in 2013; MnSHPO No. 2010-1249) and at the St. Paul Union Depot (RA-SPC-5225, listed on the National Register in 1974 with a boundary expansion in 2014).

Please note that with the exception of certain features proposed for the Union Depot Station, the platforms associated with Union Depot (including the Union Depot bus deck, the southbound platform at Wacouta Street, and northbound platform at Sibley Street) and the 5<sup>th</sup>/6<sup>th</sup> Street Station coincide with platforms currently proposed and being reviewed under Section 106 as part of the Gold Line BRT Project (MnSHPO No. 2014-0398). The Rush Line-specific design features proposed for the Union Depot Station will be included as part of this Project review, which will also consider the cumulative effect of the additional increased bus traffic for these areas. The Rush Line Project team is coordinating with the Gold Line Project team on design throughout this area.

Transit-oriented development (TOD) around station areas has the potential to affect historic properties, as well. In general, transit is merely a catalyst for redevelopment, so most TOD is considered an indirect effect. Actual redevelopment opportunities are based on global market conditions and local economic stability as well as established land use policies and zoning ordinances. Through their station area planning process, Ramsey County is conducting analysis and preparing recommendations for communities to use in local planning efforts. Communities may or may not formally adopt those recommendations. As station area planning documents are prepared, MnDOT CRU will review them to make recommendations to FTA about any potential need to adjust the APE based on community adoption of station area plans.

## Park-and-Ride Facilities

Two new park-and-ride facilities are being considered as part of the Project. An existing surface parking lot near the County Road E Station may be modified to set aside a dedicated parking area for the Project (approximately 70 parking spaces). At the Highway 36 Station, a new parking lot and/or parking structure (up to 3 stories and 550 parking spaces) is being considered, as well as a potential trail head and rain garden. In addition, an existing park-and-ride facility located at the Maplewood Mall Transit Center (opened in 2013; MnSHPO No. 2010-1249) is proposed to be used for the Rush Line BRT project; no increase in parking capacity is currently proposed. In addition to the physical effects of ground disturbance and the temporary noise and vibration effects associated with construction and/or modification of park-and-ride facilities, permanent effects may include visual effects due to structural elements, paving, and lighting, and changes to existing traffic patterns.

### Grade Separation Structures

Reactivating the RCRRA ROW with motorized vehicles requires consideration of the busway's intersections with existing roadways and trails. In many cases, signalized intersections are anticipated. However, the Project is currently proposing seven (7) grade separation structures. In addition to the physical effects of ground disturbance and the temporary noise and vibration effects associated with construction, which may include pile driving, these bridges will introduce (or reintroduce where bridges were once located) visual elements to properties within the sight lines of the structures. These visual elements may include the bridge itself, as well as associated approaches, pedestrian or bicycle facilities, lighting, retaining walls, and landscaping. In addition to the seven (7) grade separation structures, an extant underpass within the RCRRA ROW is proposed for closure. As project designs are developed, MnDOT CRU will review the size and the methods of construction for bridges and retaining walls to make recommendations to FTA about any potential need to adjust the APE.

### Roadways, Parking Lots, Pedestrian Accommodations, and Bicycle Facilities

Street and intersection improvements have the potential to result in both the physical effects of ground disturbance and temporary noise and vibration effects associated with construction. Changes to existing and introduction of new signalized intersections may result in changes to traffic. In addition to shifting the Bruce Vento Trail within a portion of the LS&M Railroad Corridor to accommodate the dedicated guideway, at-grade and grade-separated intersections with other recreational trails and pedestrian and bicycle facilities are being considered. The physical effects of ground disturbance and the temporary noise and vibration effects associated with construction are considered, along with the visual effects on the surrounding properties. Although project maps illustrate potential future expansion of the Bruce Vento Trail by Ramsey County, since expansion of the trail is not being caused by the proposed Project, only the realignment of the trail directly related to the current Project is being considered as part of the APE delineation.

### Utilities, Borrow/Fill Areas, and Floodplain/Stormwater/Wetland Mitigation Areas

In addition to the physical effects of ground disturbance and temporary noise and vibration associated with construction, utilities, borrow/fill areas, and floodplain/stormwater/wetland mitigation areas may have visual impacts to surrounding properties. MnDOT CRU will review these elements as they are added to, and better defined within, the Project scope and make recommendations to FTA about any potential need to adjust the APE.

### Land Acquisition

Proposed land acquisition may include partial or full parcel acquisition. Land proposed for acquisition and any other areas of ground disturbing activity associated with land acquisition will be included within the APE. The potential effects of specific project elements proposed for the acquired parcels are considered as appropriate.

### Operations and Maintenance Facilities (OMFs)

No new OMFs are currently planned as part of the Project. The East Metro Garage (opened in 2001; MnSHPO No. 1999-1621) may be used for Rush Line BRT maintenance and may receive interior modifications to accommodate the electric bus fleet. Any potential noise or vibration due to construction is anticipated to be limited to the current land parcel. If OMFs are added to the Project scope or if additional exterior changes are proposed to the East Metro Garage, MnDOT CRU will review them to make recommendations to FTA about any potential need to adjust the APE. Potential effects

might include the physical effects of ground disturbance, temporary noise and vibration effects associated with construction, and visual effects due to structural elements, paving, and lighting.

**APE Parameters**

General parameters and rationale for the development of the APE are listed below. The APE as delineated includes all ground disturbing activities within the anticipated limits of disturbance (LOD) for the project. The LOD includes all areas of proposed construction activities, other potential ground-disturbing activities associated with construction (such as staging/storage/borrow excavation), and proposed land acquisition. The entirety of the public right-of-way (ROW) within the RCRRA/LS&M corridor is incorporated into the LOD in order to accommodate the extensive modifications proposed to shift the Bruce Vento recreational trail and construct dedicated BRT guideway. The APE parameters also consider all other potential direct or indirect effects, including physical, auditory, atmospheric, or visual impacts to historic properties or their settings, and cumulative and reasonably foreseeable effects caused by the Project.

In certain project areas, the parameters have been modified during APE delineation to account for the known size and scale of proposed structures, anticipated construction methods, the potential for obstructed or unobstructed views to or from the project, or anticipated traffic impacts or development pressures. As planning and design advance and project details are further defined, the APE will continue to be reassessed by MnDOT CRU to account for project effects that are not known or fully understood at this time. MnDOT CRU will make recommendations to FTA about any potential need to adjust the APE.

Project Element	APE and Rationale
Running Ways and Guideways	
New dedicated guideway	All properties within 250 feet of the guideway centerline(s) [or the construction limits/LOD, where appropriate] to account for potential physical effects, visual effects, above-grade elements (e.g., lighting, trees, signage, etc.), new bus traffic on a current recreational trail, and temporary noise/vibration during construction. This may be increased or decreased depending on onsite conditions, anticipated visibility of the guideway and related BRT traffic, and the presence of intervening landscape features or buildings.
BRT operating in mixed traffic and on new dedicated transit lanes (including business access and transit BAT lanes)	All properties within 125 feet of the guideway centerline(s) [or the construction limits/LOD, where appropriate] to account for potential physical effects, visual effects, changes in traffic, and temporary noise/vibration during construction. Where appropriate, this may be decreased to the construction limits/LOD where proposed construction will be limited to repainting, repair, and/or mill and overlay of existing pavement.










Project Element	APE and Rationale
<b>Stations and Park-and-Ride Facilities</b>	
New stations and Park-and-Ride Structures	All properties within 250 feet of the parcel's perimeter [or the construction limits/LOD, where appropriate] to account for potential physical effects, visual effects, new traffic, and temporary noise/vibration during construction. This may be modified in response to future station area planning, depending on local adoption of Project recommendations.
Modifications to existing stations and park-and-ride structures	For minor modifications, such as reconfiguration or reconstruction of existing station platforms and minor exterior alterations to existing structures, all properties within the parcel's perimeter [or the construction limits/LOD, where appropriate] to account for potential physical effects and temporary noise/vibration during construction. For additions or extensive exterior modifications, all properties within 175 feet of the parcel's perimeter [or the construction limits/LOD, where appropriate] to account for potential physical effects, visual effects, new traffic, and temporary noise/vibration during construction. This may be increased if the modification results in a substantial increase in height or footprint.
New surface parking facilities with bus traffic or modifications to existing surface parking facilities to accommodate buses (surface parking facilities without bus traffic, below)	All properties within 175 feet of the parcel's perimeter [or the construction limits/LOD, where appropriate] to account for potential physical effects, visual effects, new traffic, and temporary noise/vibration during construction.
<b>Bridges and Grade-Separation Structures</b>	
New bridge locations or replacements proposed for the same location (no pile driving)	All properties within 250 feet of the parcel's perimeter [or the construction limits/LOD, where appropriate] to account for potential physical effects, visual effects, new traffic or changes in existing traffic, and temporary noise/vibration during construction.
New bridge locations or replacements proposed for the same location (pile driving)	All properties within 600 feet of the parcel's perimeter [or the construction limits/LOD, where appropriate] to account for potential physical effects, visual effects, new traffic or changes in existing traffic, and temporary noise/vibration during construction.
Modifications to existing bridges resulting in no substantial increase in size (no pile driving)	All properties within 175 feet of the structure [or the construction limits/LOD, where appropriate] to account for potential physical effects, visual effects, and temporary noise/vibration during construction. This may be decreased to the construction limits/LOD where proposed construction will be limited to minor repairs and/or mill and overlay of existing roadway surface over bridges.

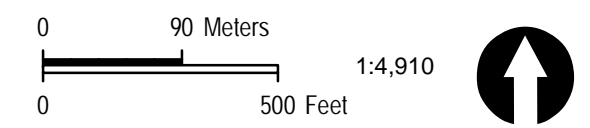
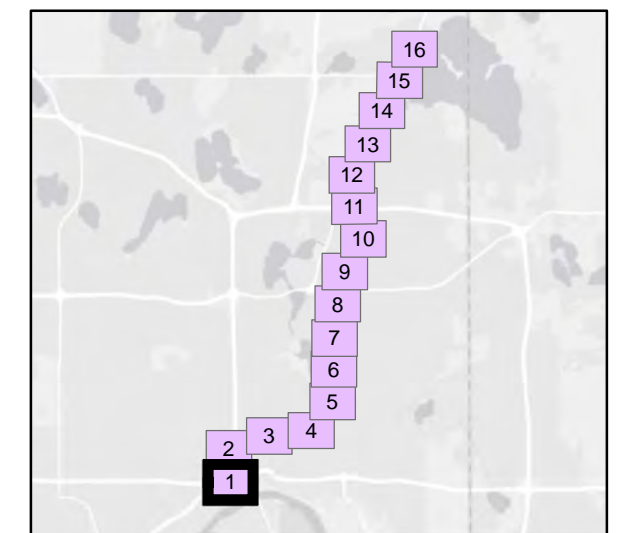
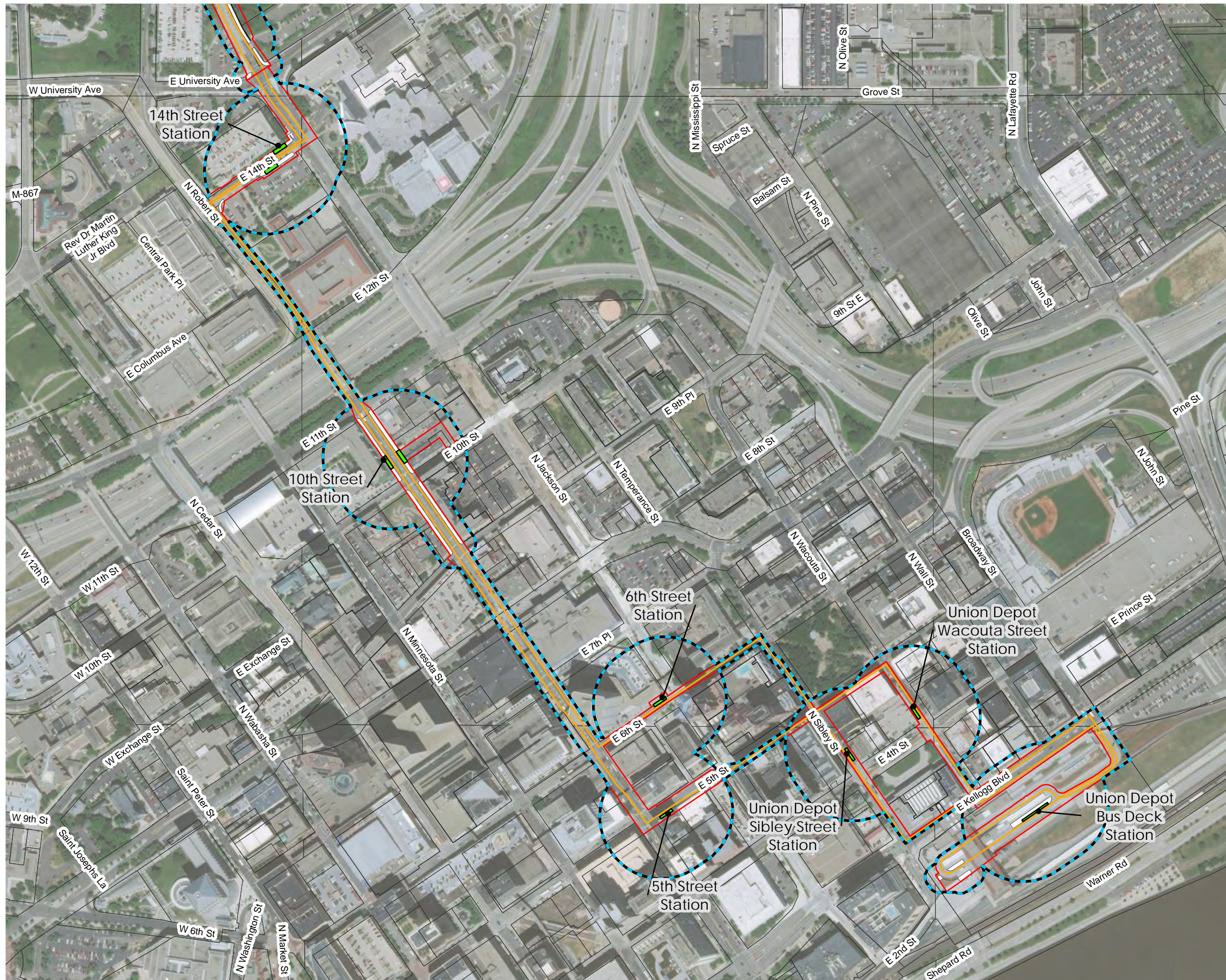


Project Element	APE and Rationale
Retaining walls (no pile driving)	All property within 100 feet of the construction limits/LOD to account for physical effects, temporary noise/vibration during construction, and potential visual effects. This may be increased or decreased depending the change in grade and the method of construction.
<b>Adjacent/Intersecting Roadways, Parking Lots, and Pedestrian/Bicycle Facilities</b>	
Minor modifications, including mill and overlay, of existing roadways within existing paved roadway limits (i.e., curb to curb).	All properties within the construction limits/LOD to account for physical effects and temporary noise and vibration effects during construction.
New and relocated/realigned roadways not within existing paved roadway limits	All properties within 125 feet of the perimeter of the construction limits/LOD to account for temporary and permanent noise and vibration effects, new traffic, and permanent visual effects.
New surface parking facilities, modifications to existing surface parking facilities, and new access roads (surface parking facilities to accommodate park-and-ride or bus traffic, above)	All property within 125 feet of the construction limits/LOD to account for physical effects and potential visual effects of above-grade elements (e.g., security and pedestrian-scaled lighting, trees, signage, etc.), new traffic, and temporary noise/vibration during construction. For modifications to existing surface parking facilities, this may be decreased to the construction limits/LOD where proposed improvements will be limited to repainting, reconfiguration not impacting access, and/or mill and overlay of existing pavement.
New pedestrian/bicycle facilities, including pedestrian (ADA) ramps, sidewalks, and trails	All property within 50 feet of the construction limits/LOD to account for physical effects, temporary noise/vibration during construction, and potential visual effects.
Above-grade amenities (e.g., pedestrian-scaled lighting, trees, signage, etc.)	All property within 100 feet of the construction limits/LOD to account for physical effects, temporary noise/vibration during construction, and potential visual effects.
<b>Utilities, Borrow/Fill Areas, and Floodplain/Stormwater/Wetland Mitigation Areas</b>	
Below ground utilities (no pile driving)	All property within 25 feet of the construction limits/LOD to account for physical effects and temporary noise/vibration during construction.
Above ground utility lines other than high-voltage transmission lines (no pile driving)	All property within 125 feet of the parcel's perimeter [or the construction limits/LOD, where appropriate] to account for physical effects, potential visual effects, and temporary noise/vibration during construction.
Borrow/Fill areas	
Floodplain/stormwater/wetland mitigation areas	
<b>Land Acquisition</b>	
Partial or full parcel land acquisition	All property within the full parcel perimeter. Modifications to the acquired land will be handled in other Project Elements within this table

Project Element	APE and Rationale
Operations and Maintenance Facilities (OMF)	
OMF (new)	All properties within 0.25 miles (2,640 feet) from the parcel perimeter to account for physical effects, permanent visual effects, and noise/vibration during construction and operation.
Modifications to existing OMFs	For interior modifications and/or minor exterior alterations to buildings, all properties within the parcel's perimeter [or the construction limits/LOD, where appropriate] to account for potential physical effects and temporary noise/vibration during construction. For additions or extensive exterior modifications, all properties within 175 feet of the parcel's perimeter to account for potential physical effects, visual effects, new traffic, and temporary noise/vibration during construction. This may be increased if the modification results in a substantial increase in height or footprint.










Rush Line BRT  
 Ramsey County, Minnesota

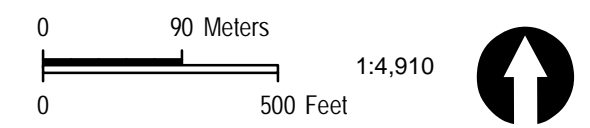
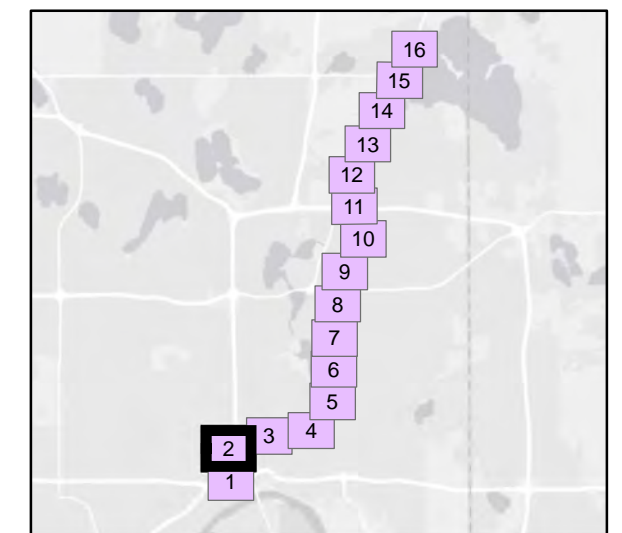
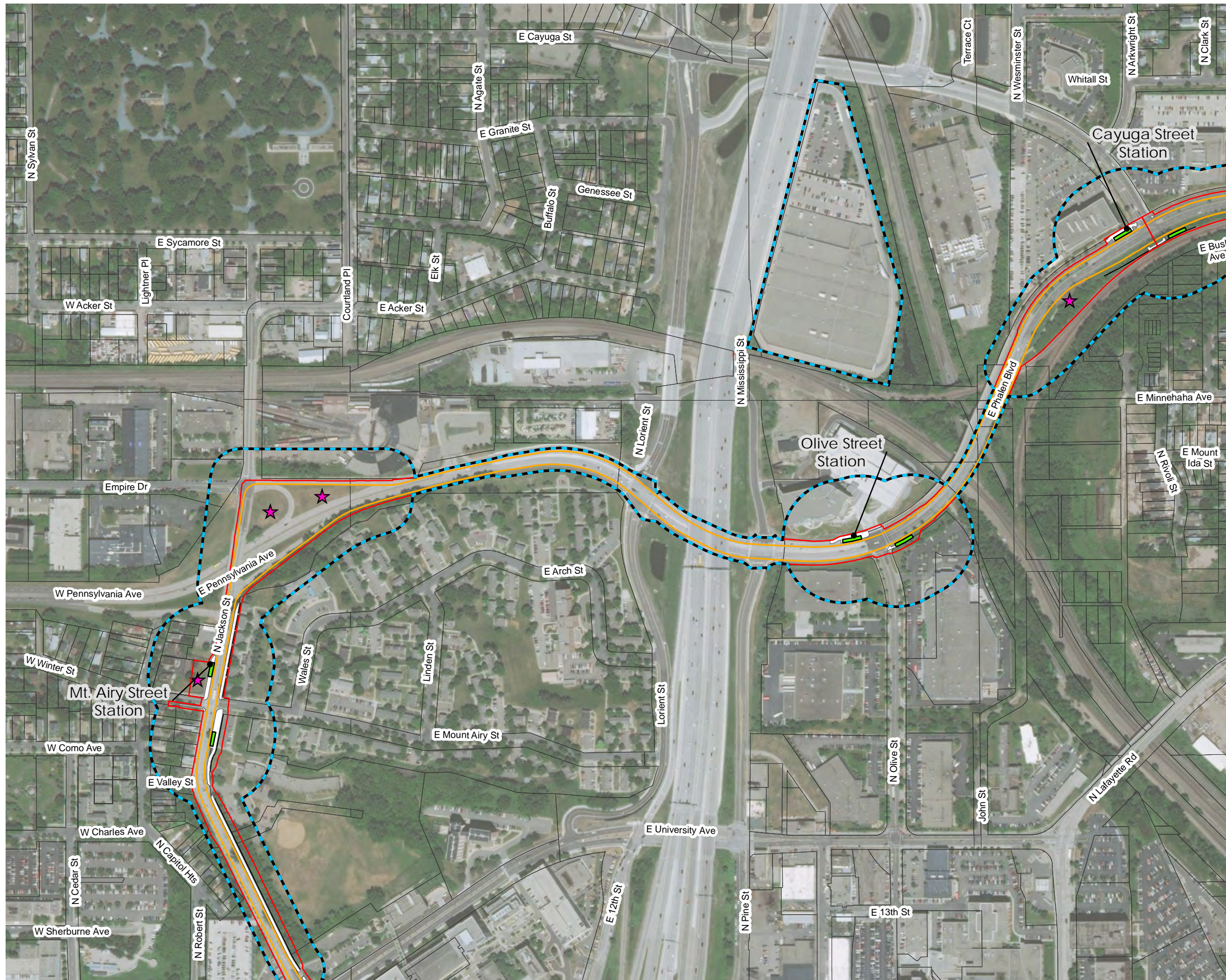
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-  Alignment (7/15/19)
-  Station Platforms (7/15/19)
-  Bridges (9/19/19)
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-  Potential Linear Stormwater (BMP) Sites (9/20/19)
-  Trails and Sidewalks (9/24/19)
-  Retaining Walls (9/24/19)



Area of Potential Effect  
 As Revised on 10/7/2019










**Rush Line BRT**  
**Ramsey County, Minnesota**

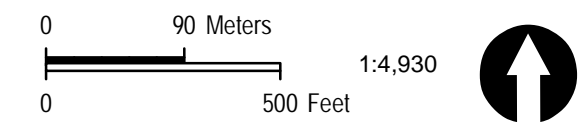
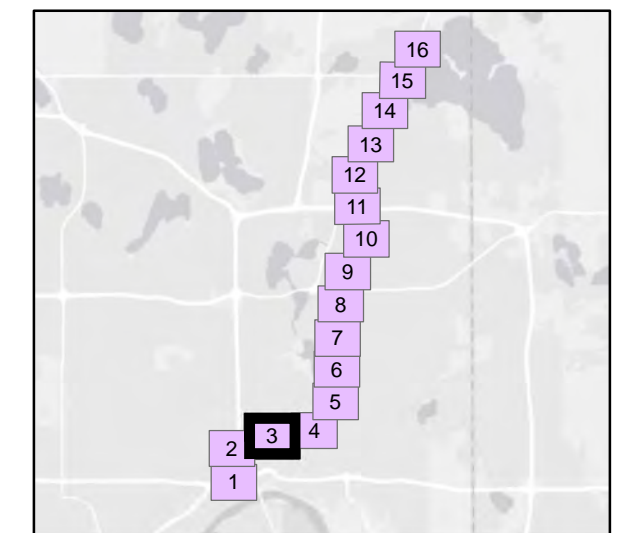
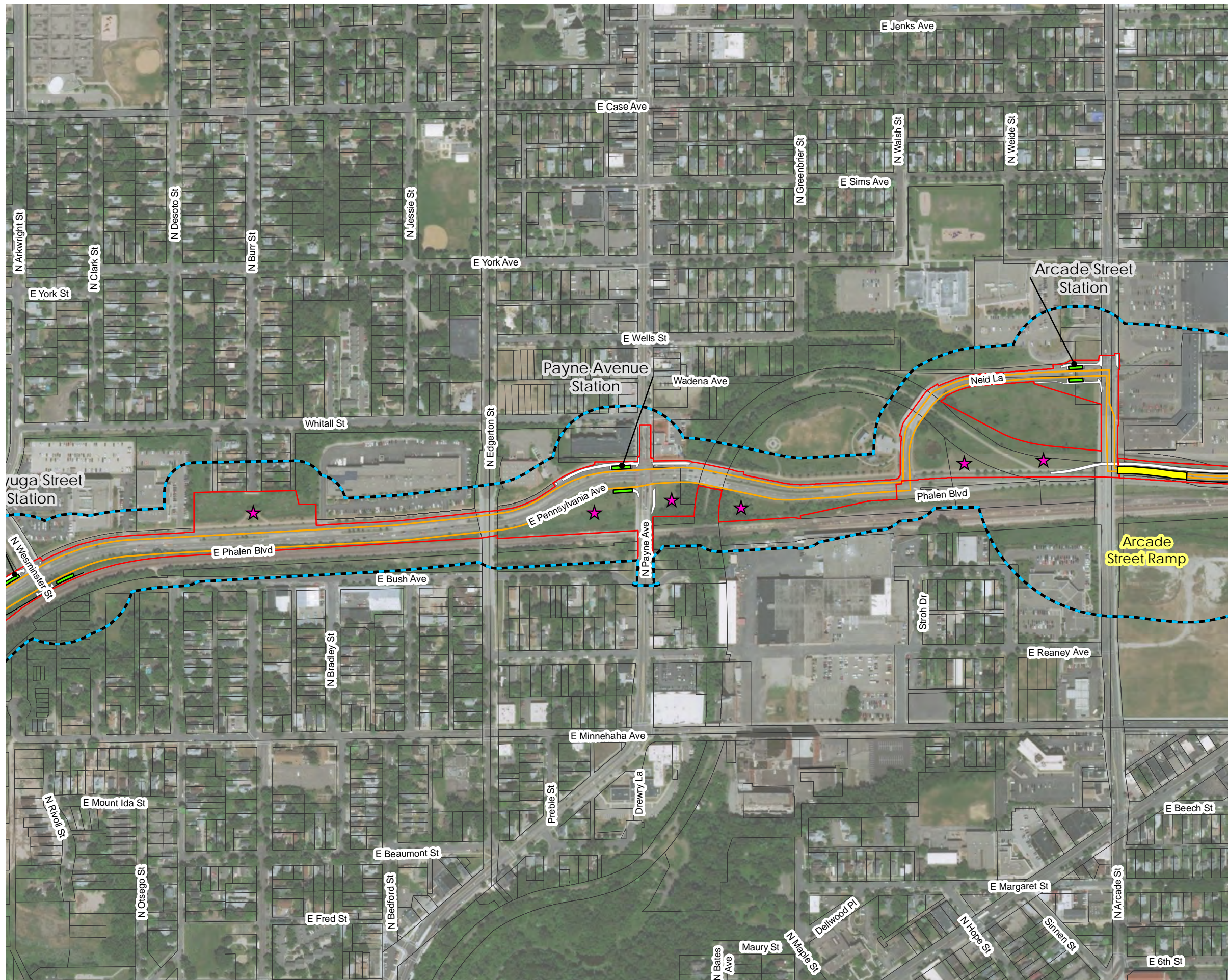
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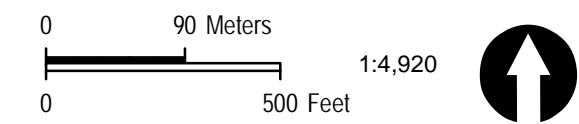
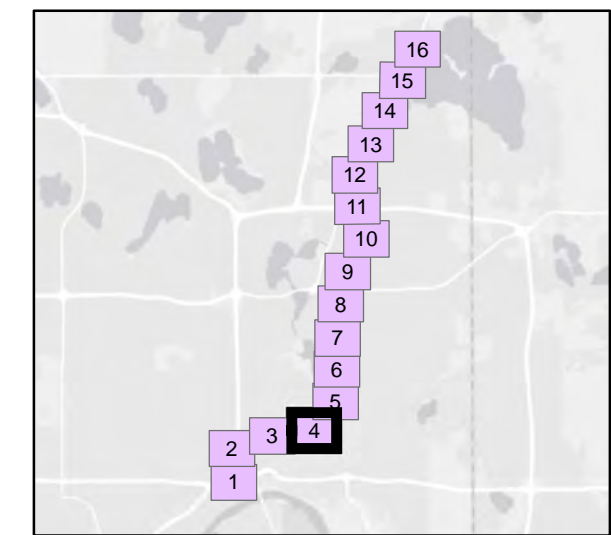
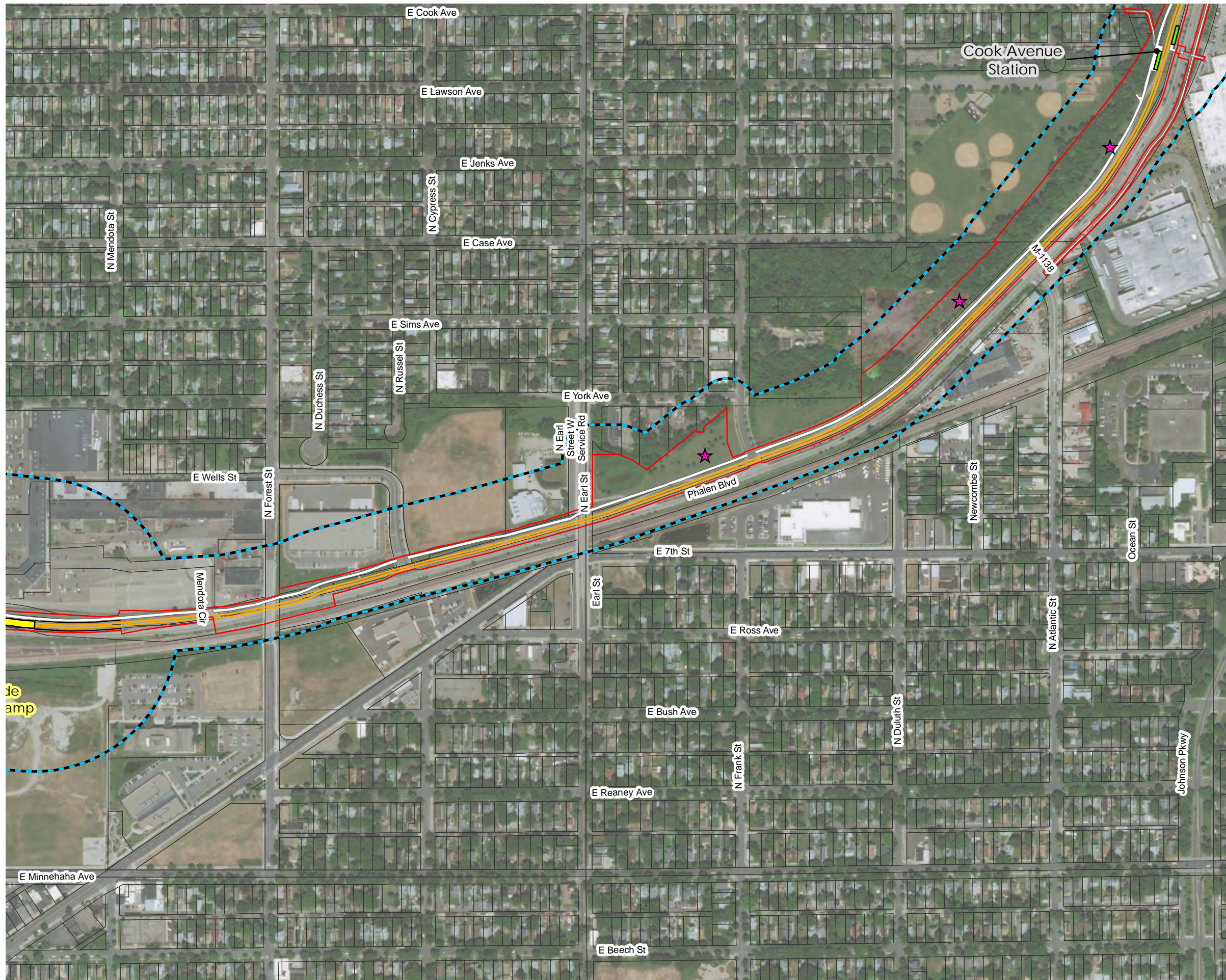
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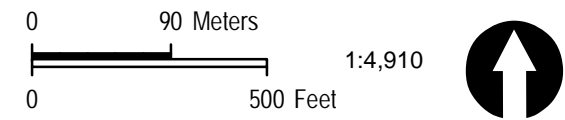
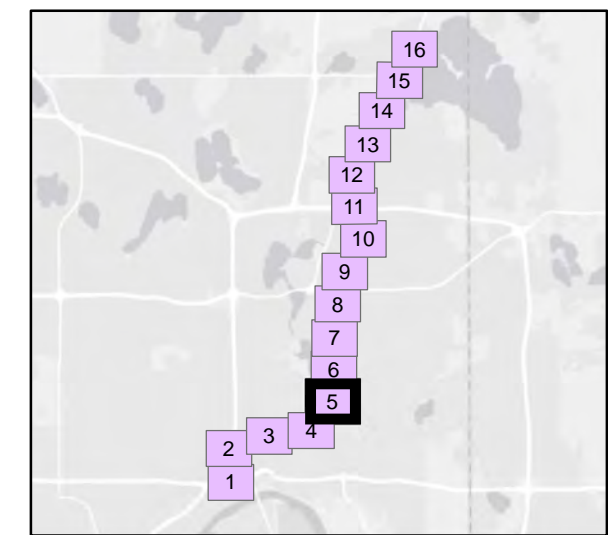
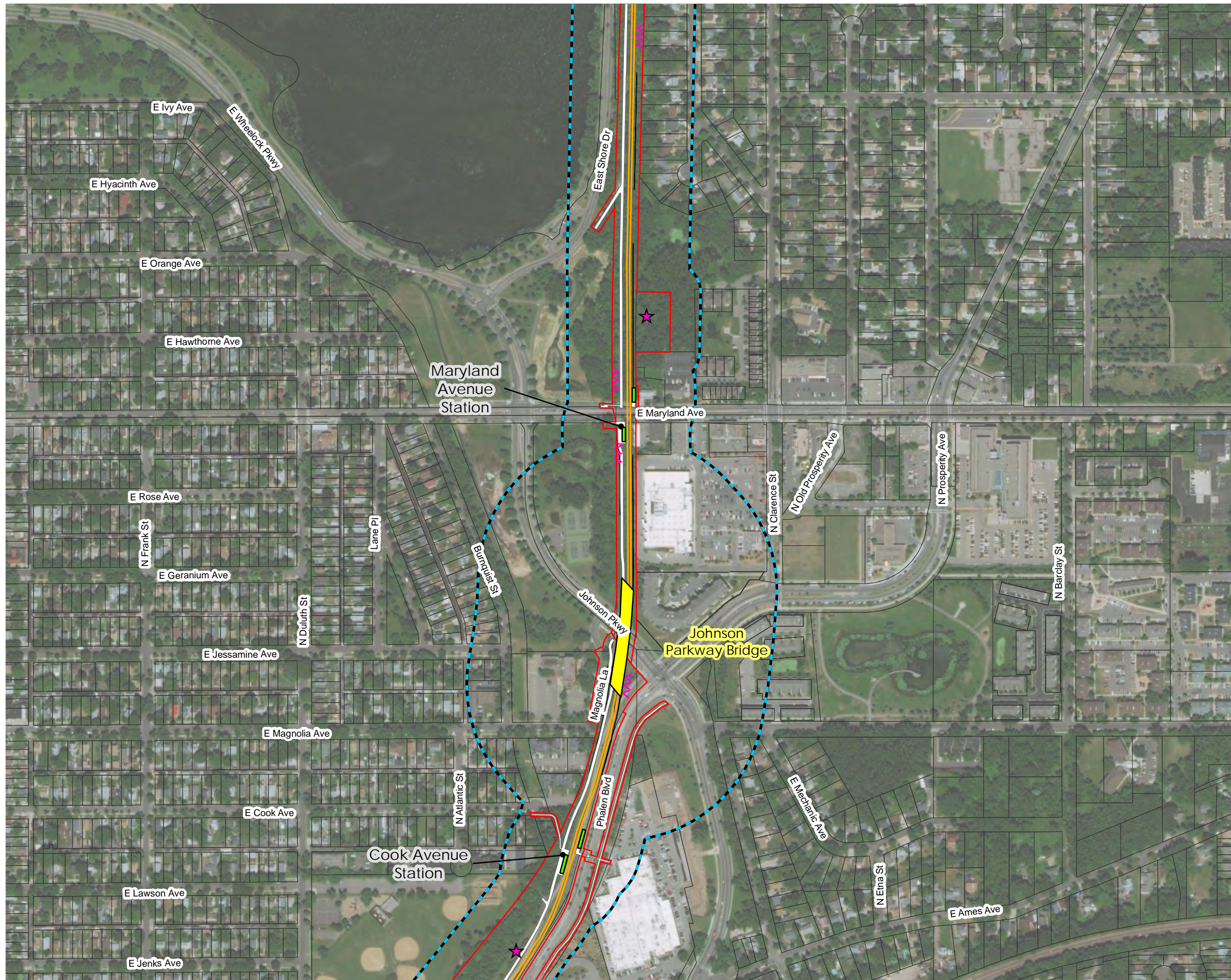
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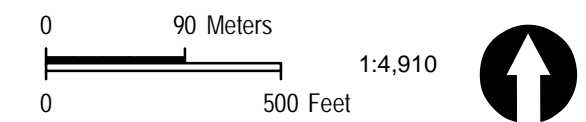
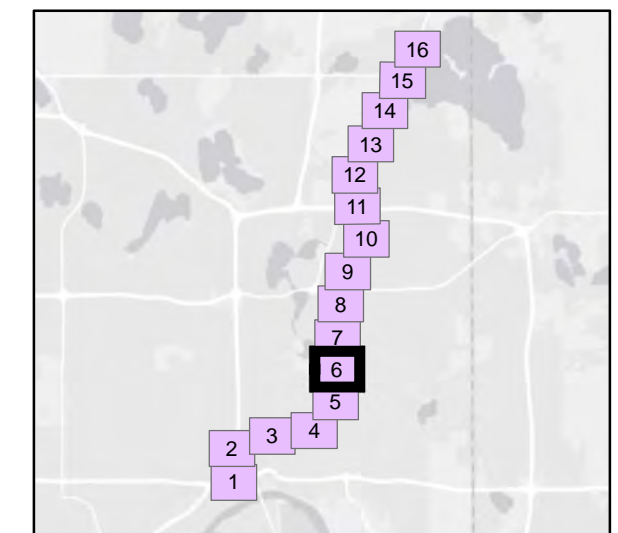
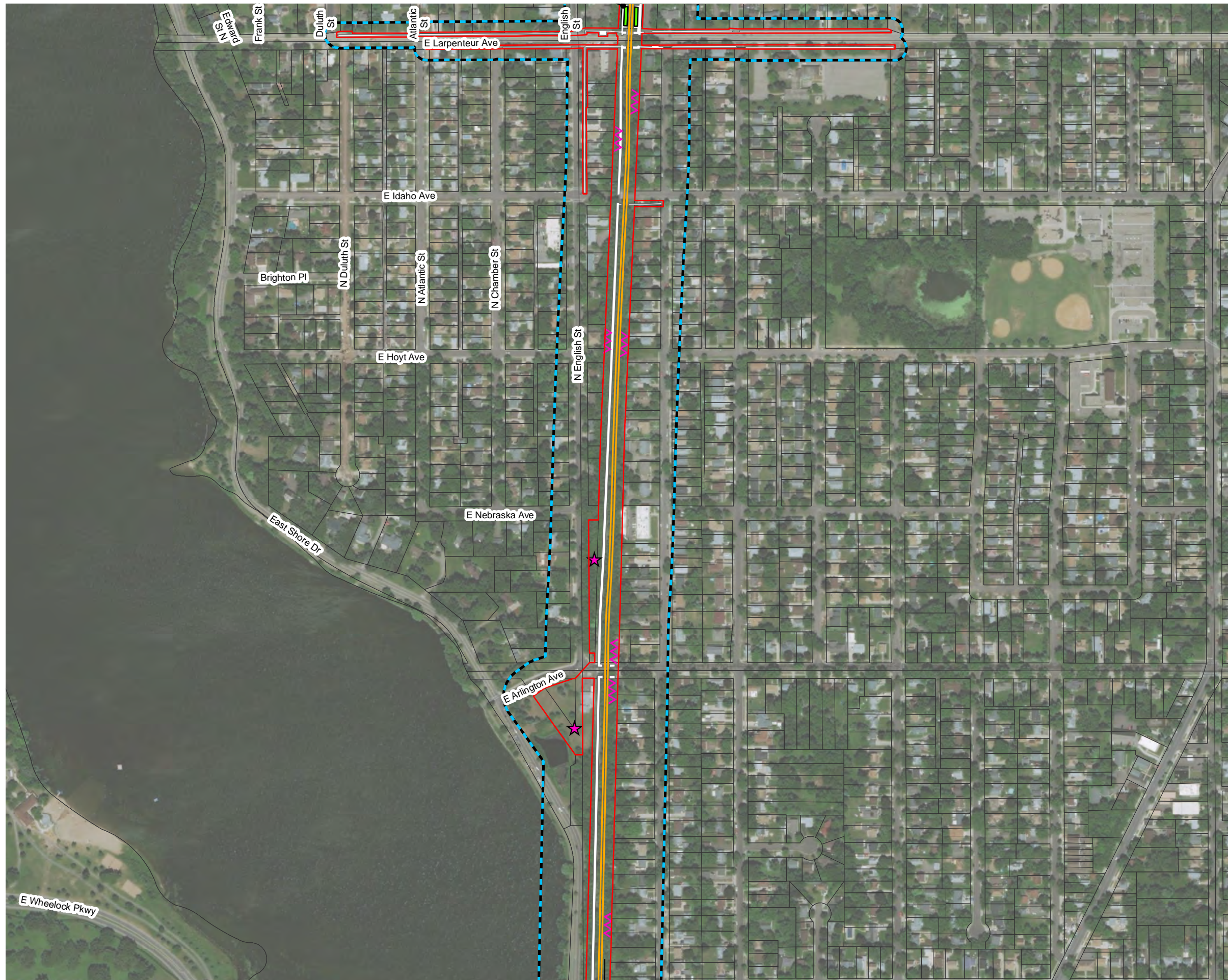
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Ramsey County, Minnesota










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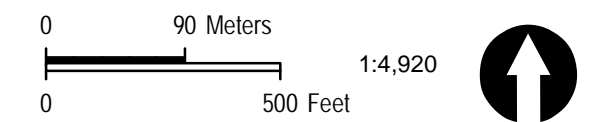
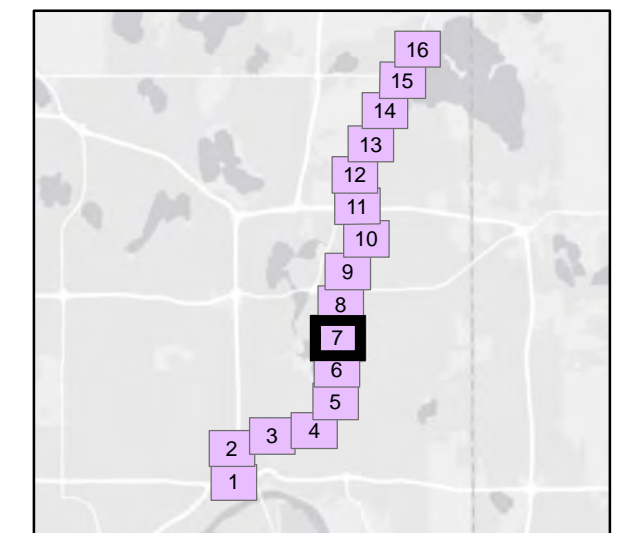
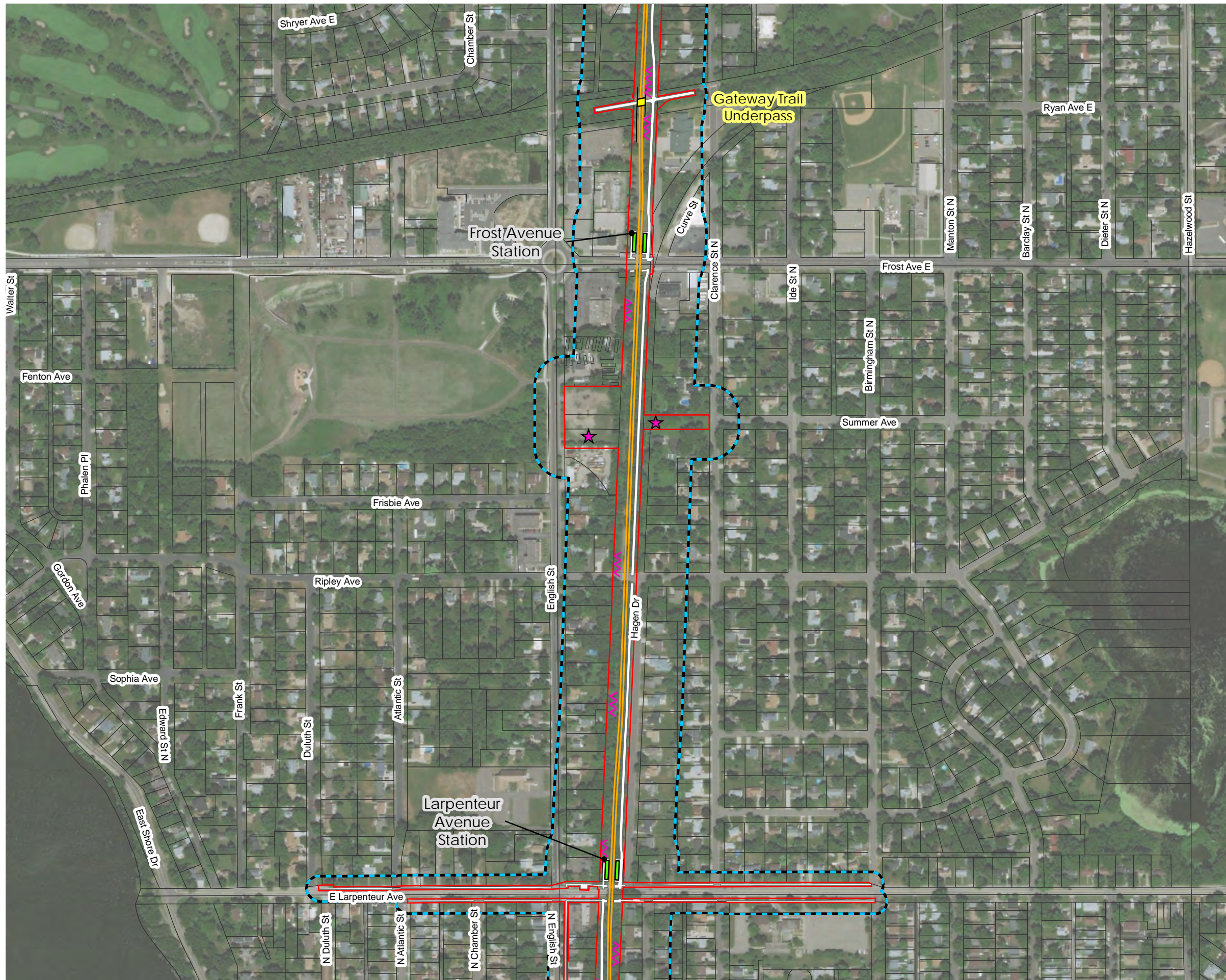


Area of Potential Effect  
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Rush Line BRT  
Ramsey County, Minnesota

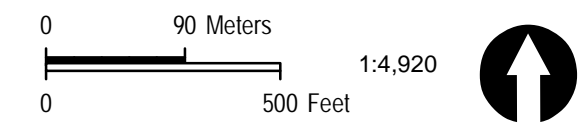
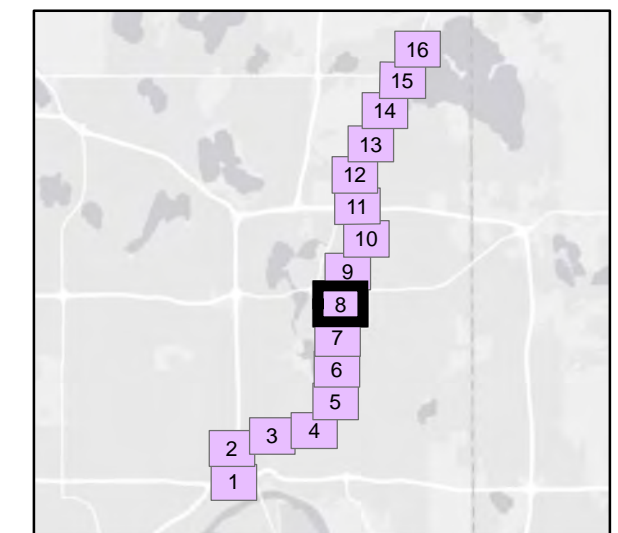
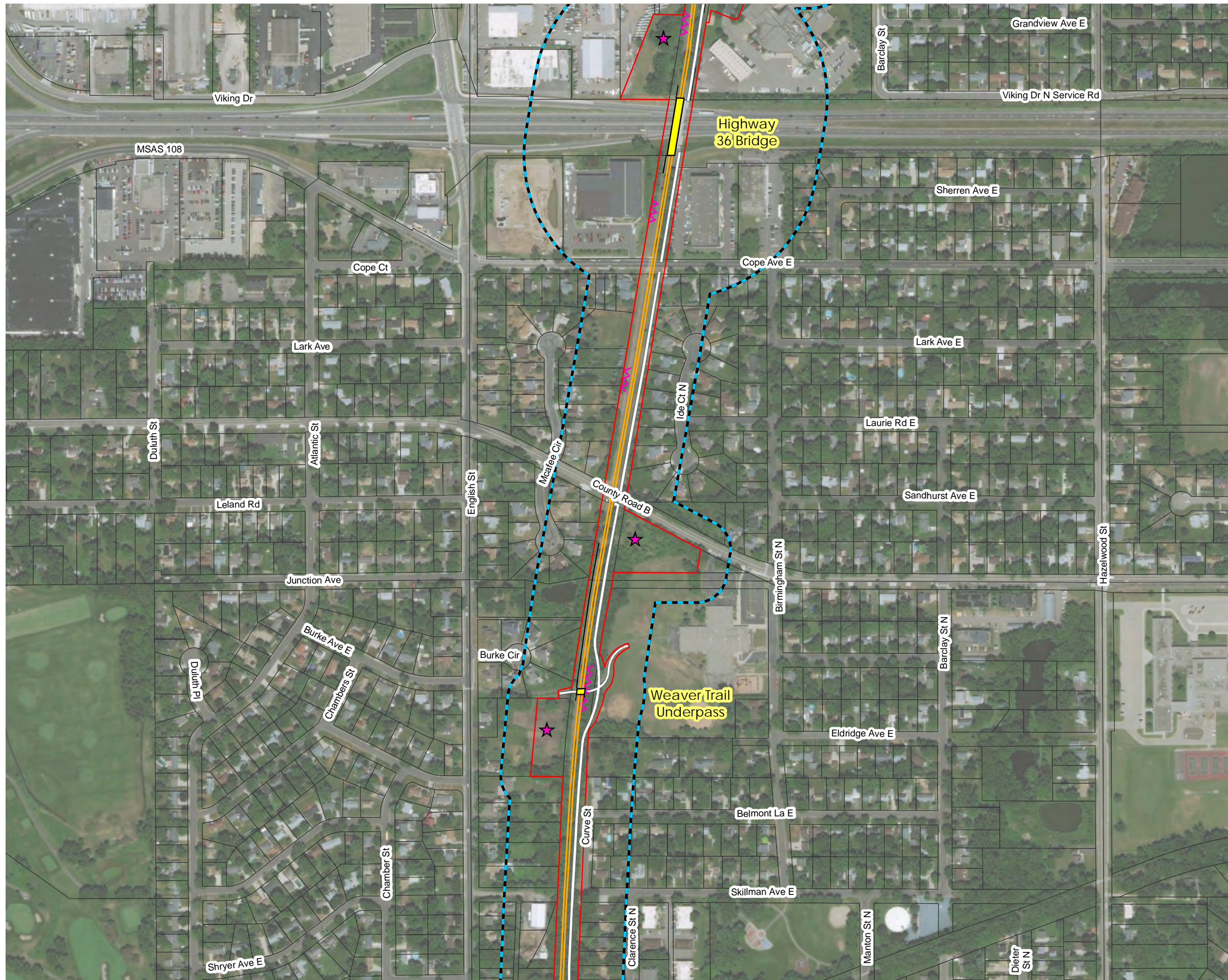
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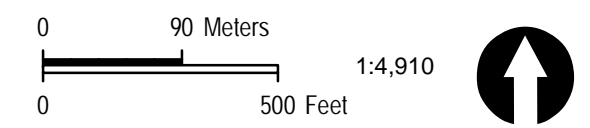
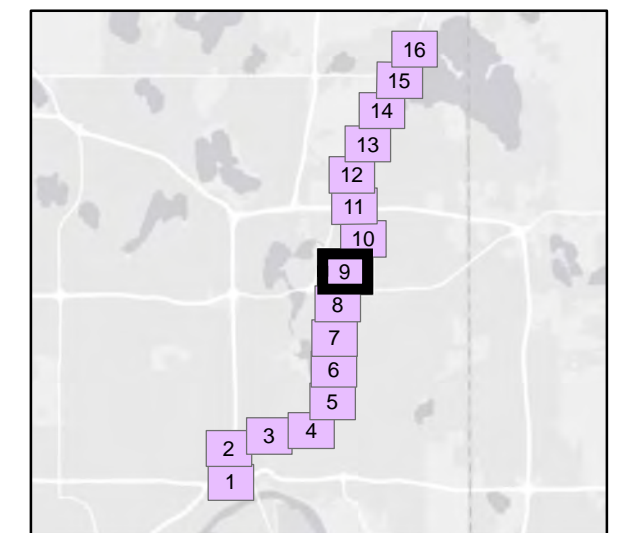
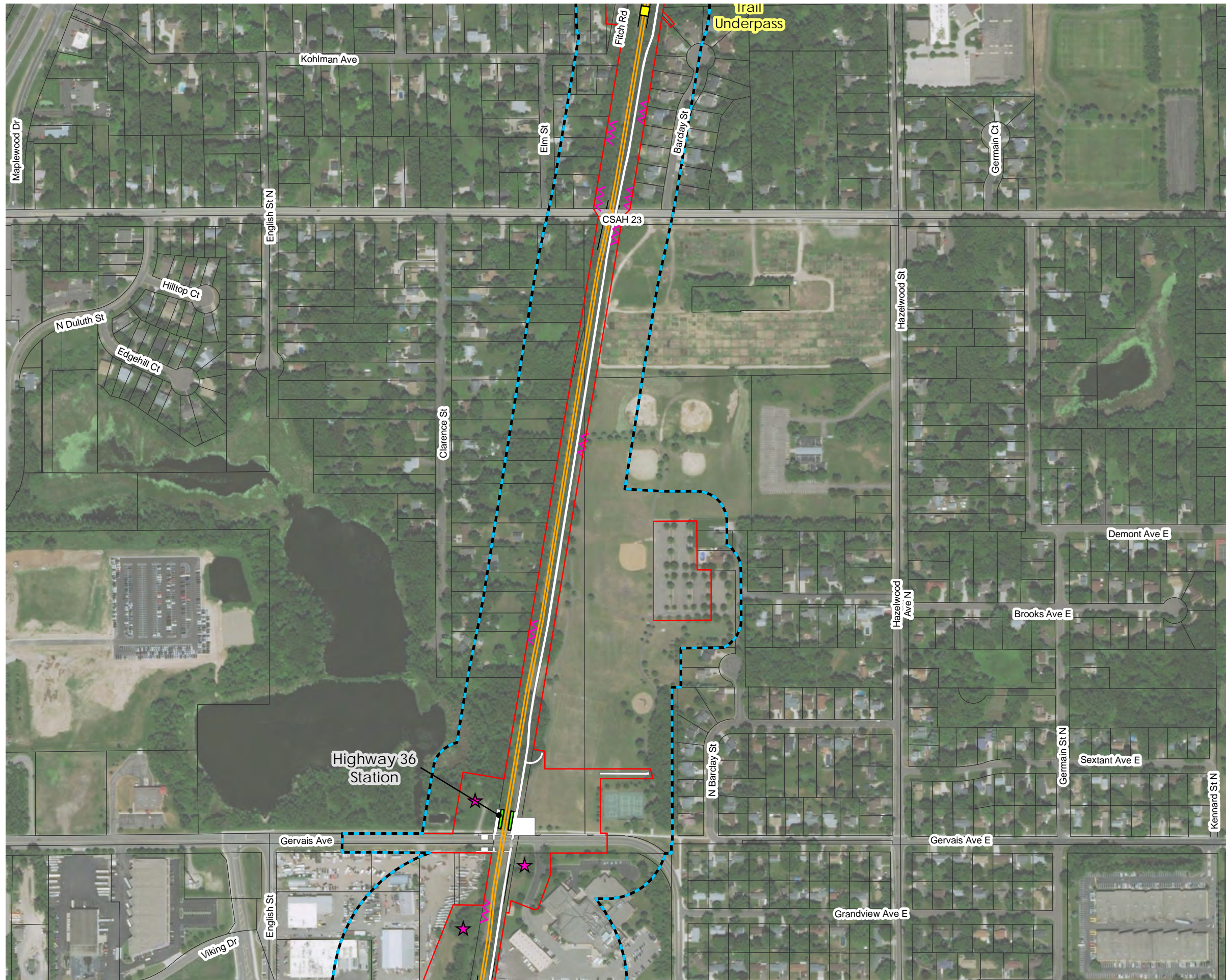
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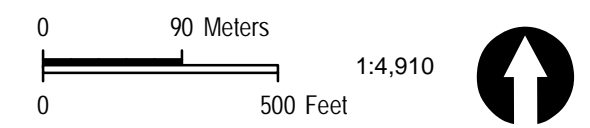
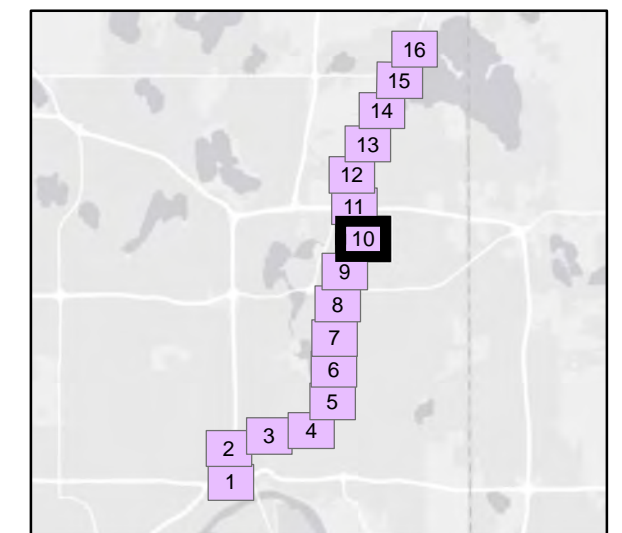
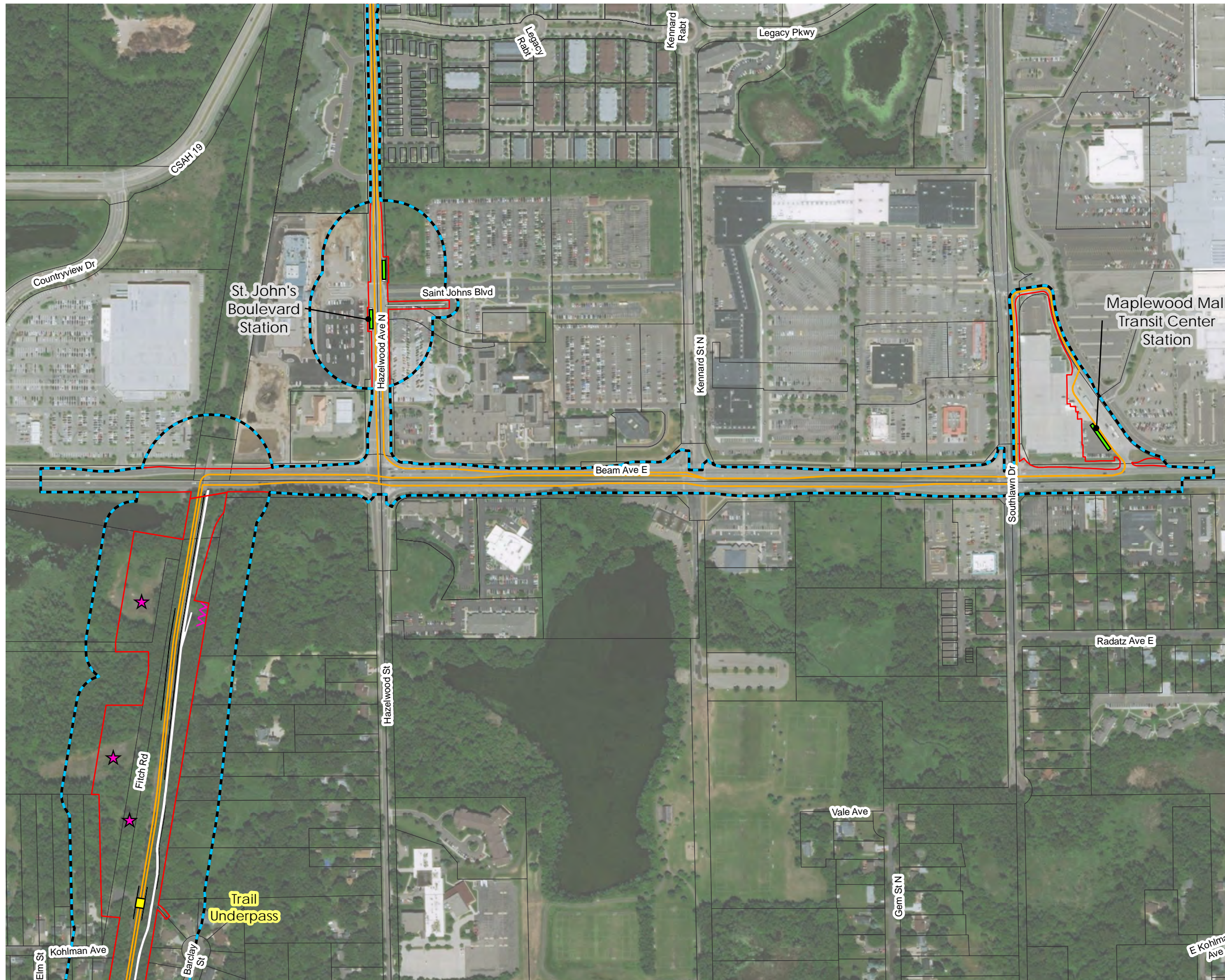
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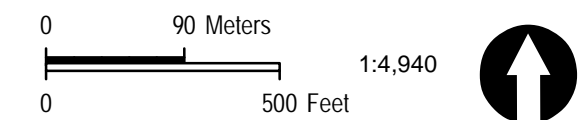
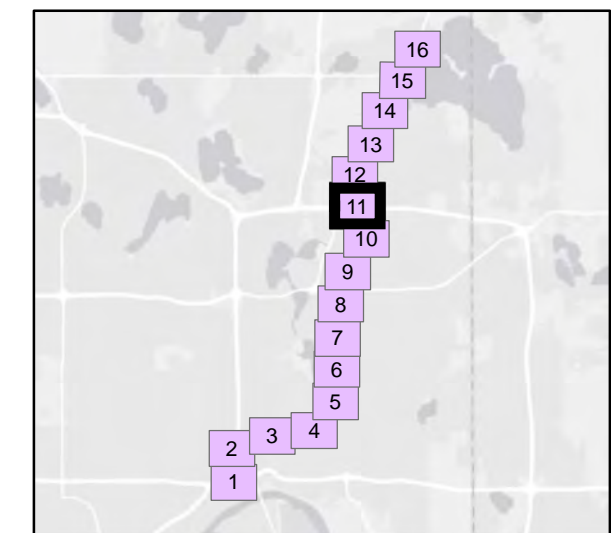
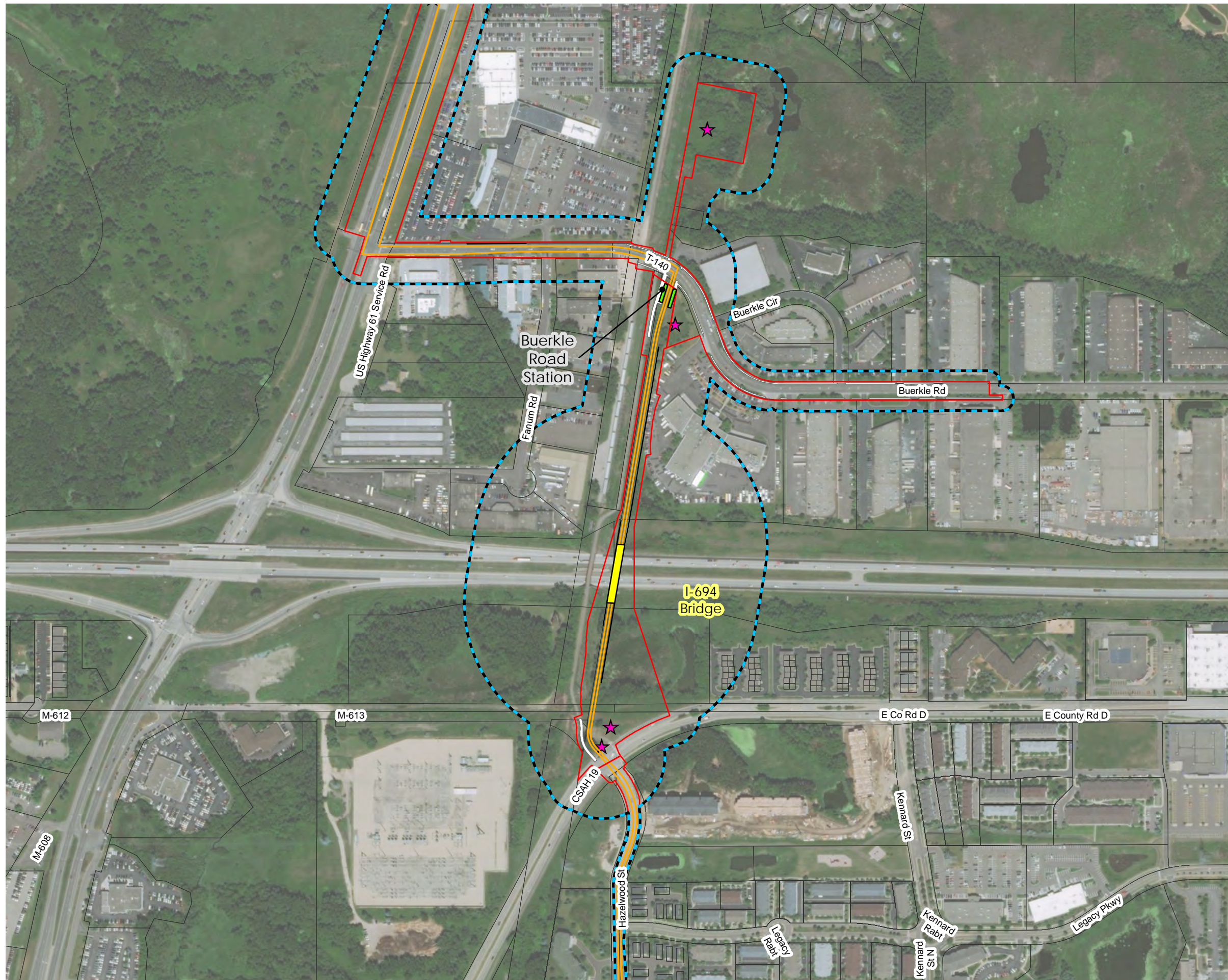
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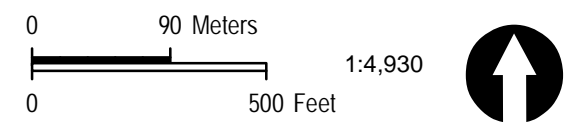
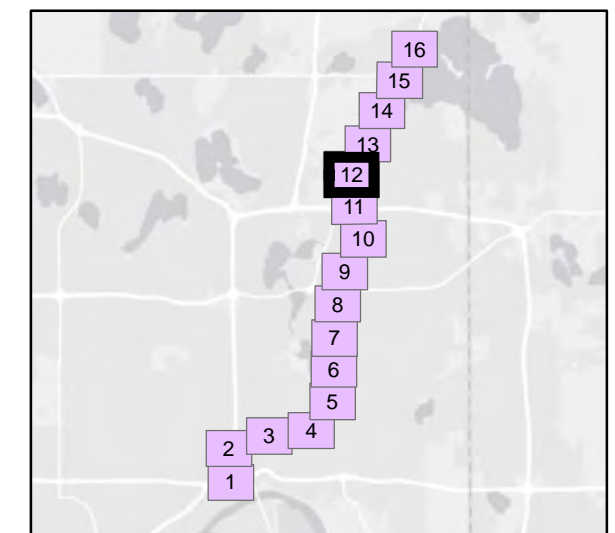
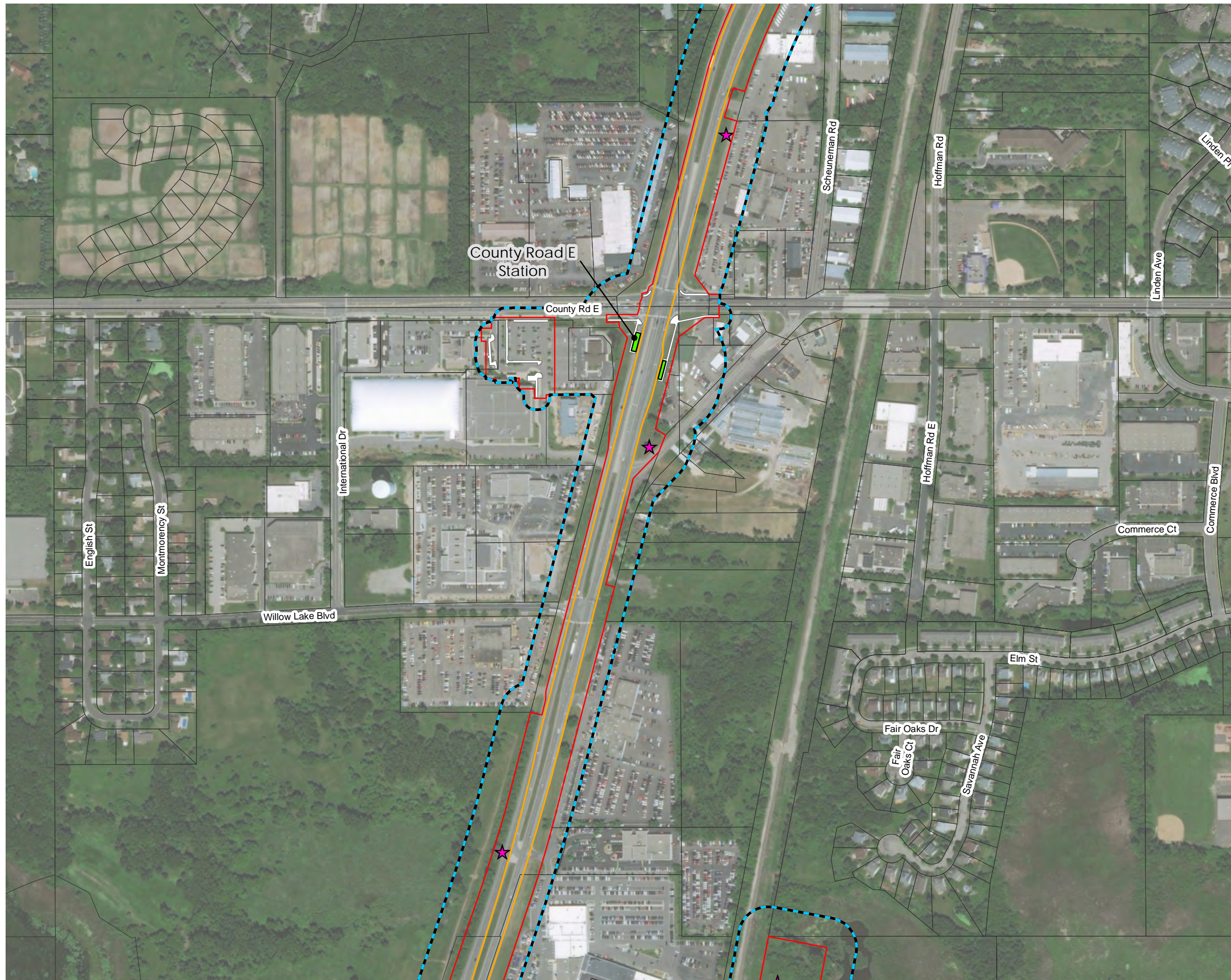
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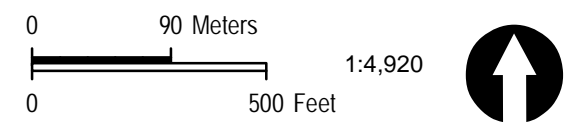
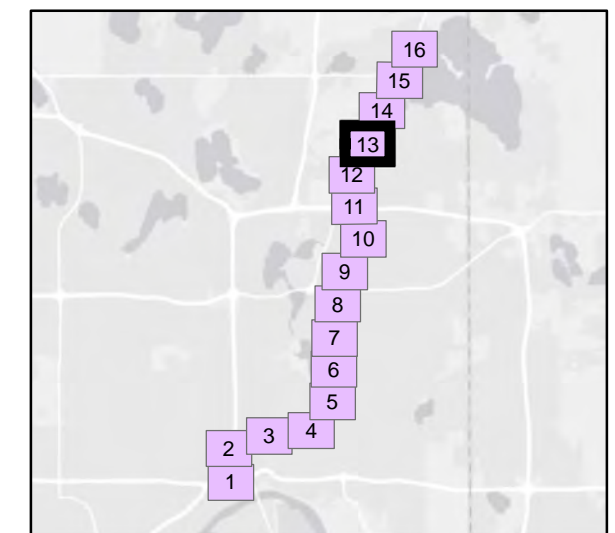
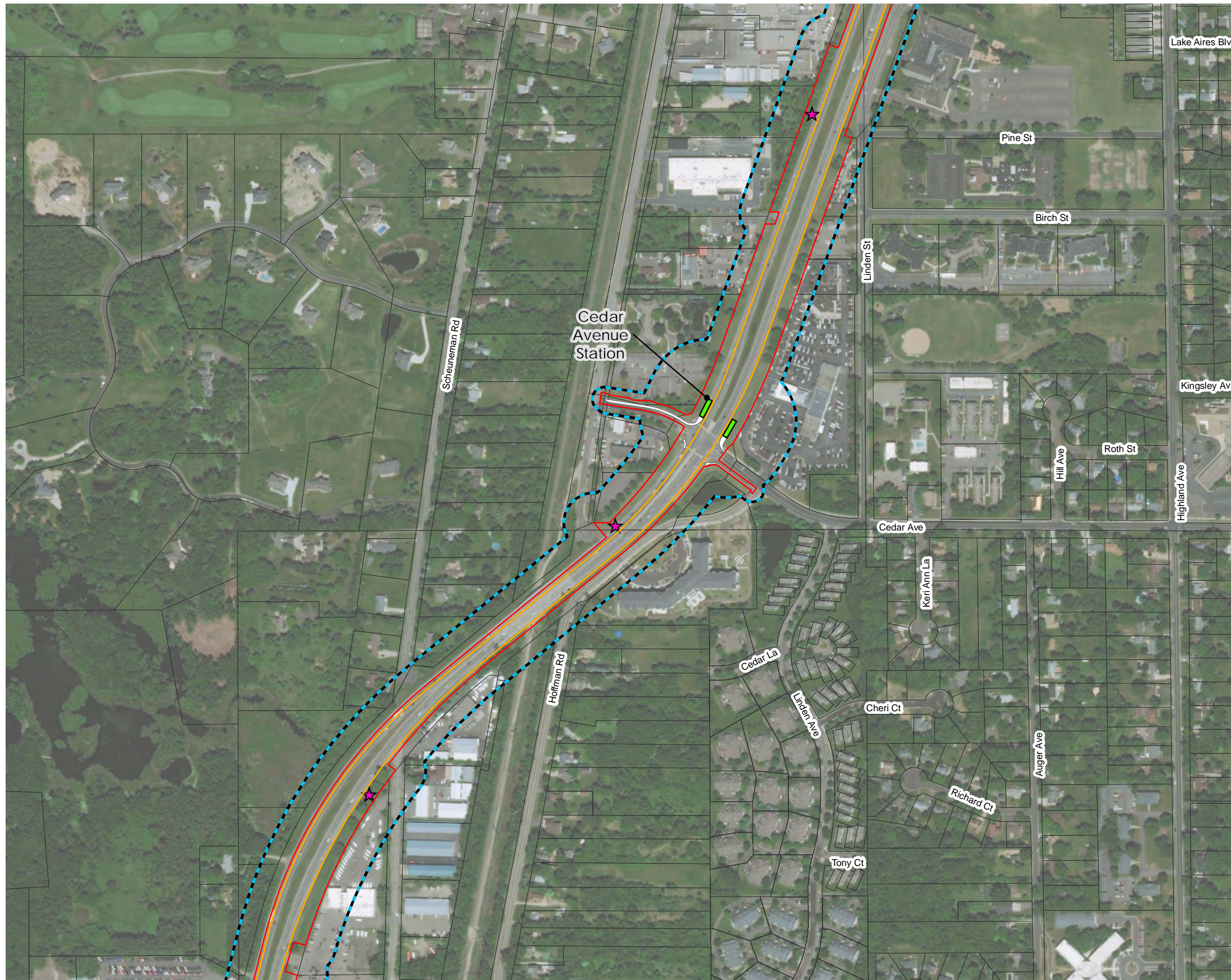
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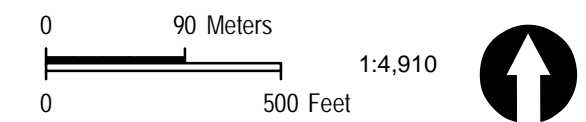
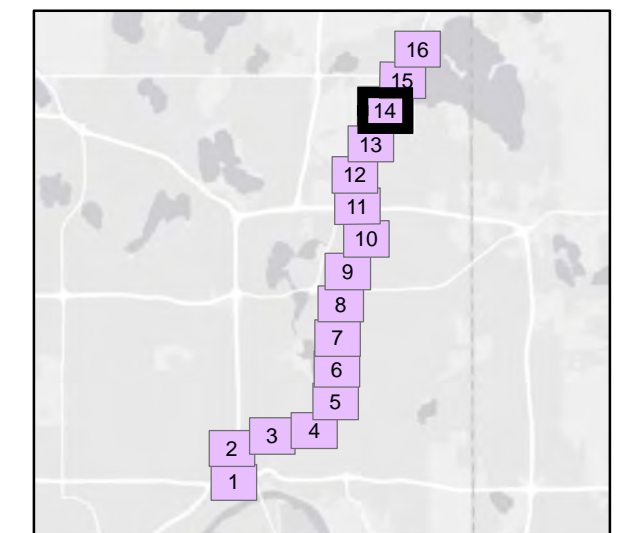
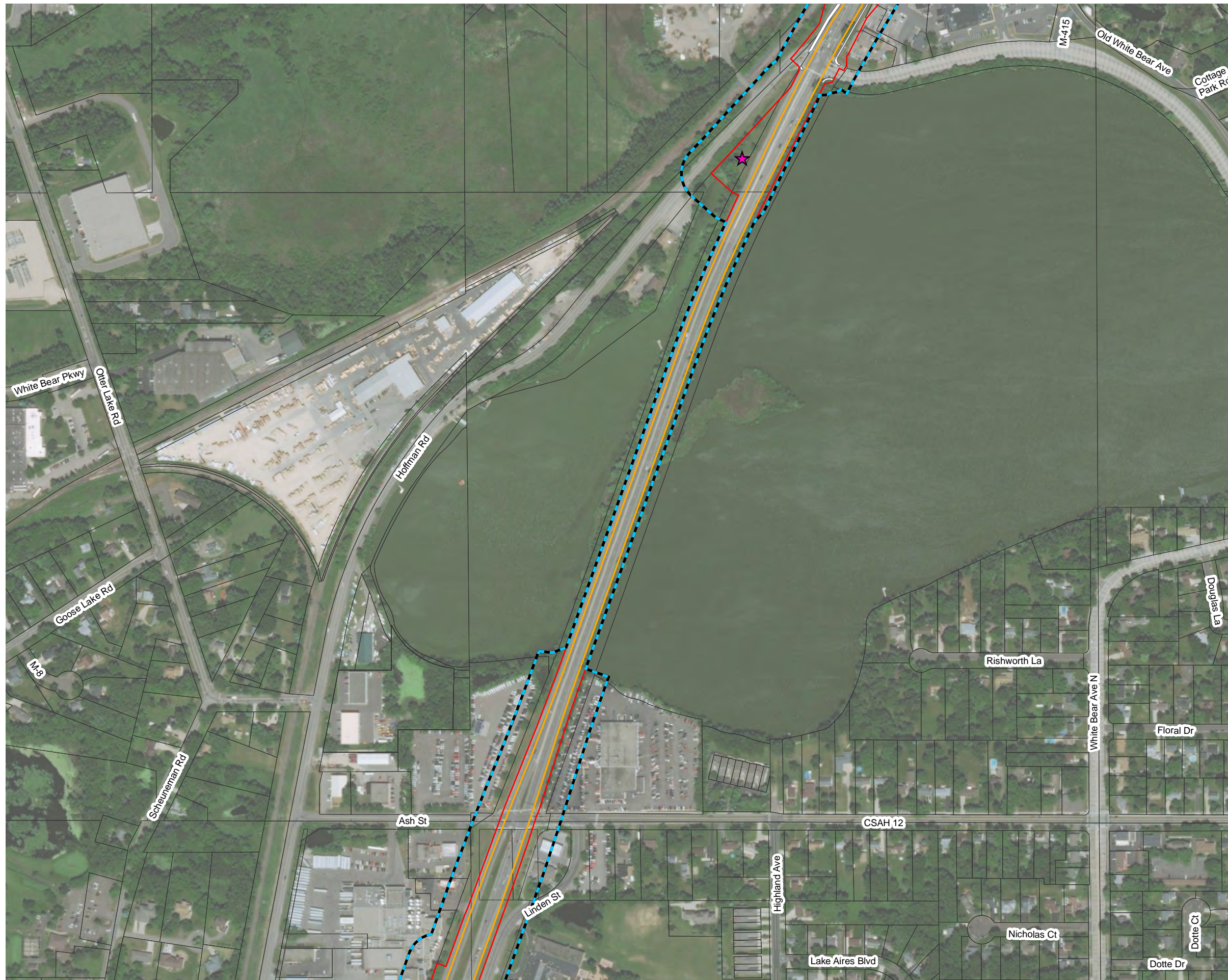
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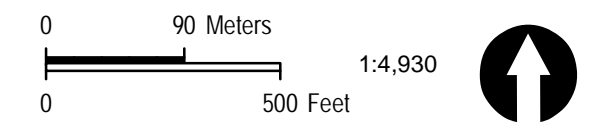
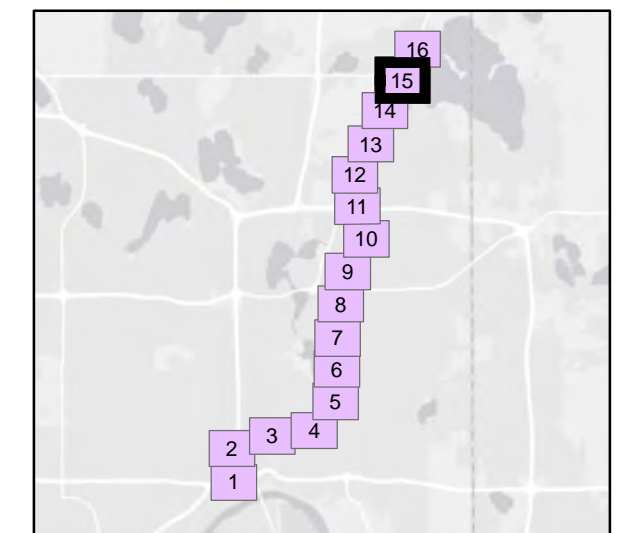
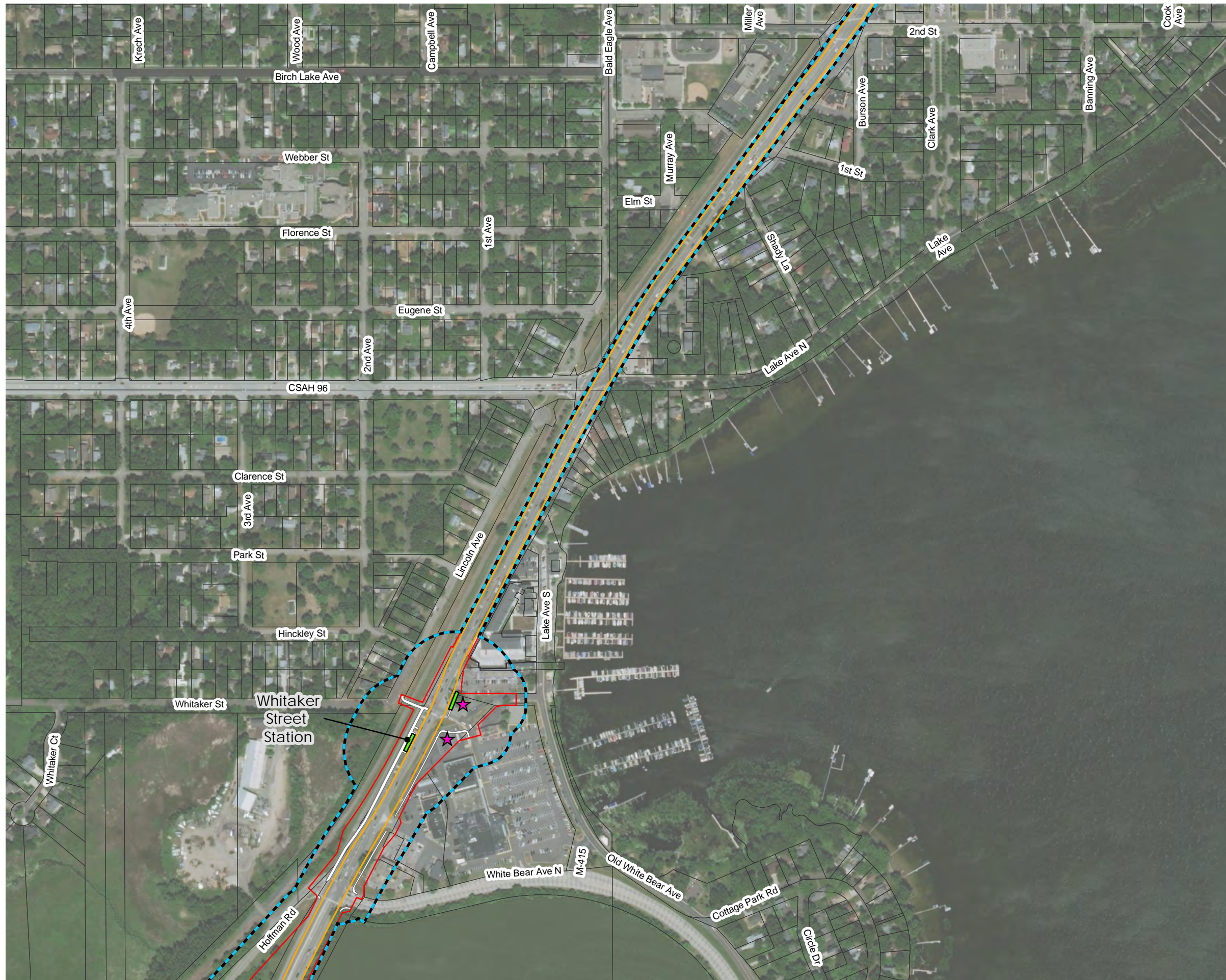


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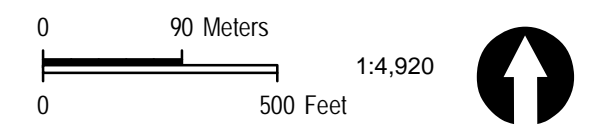
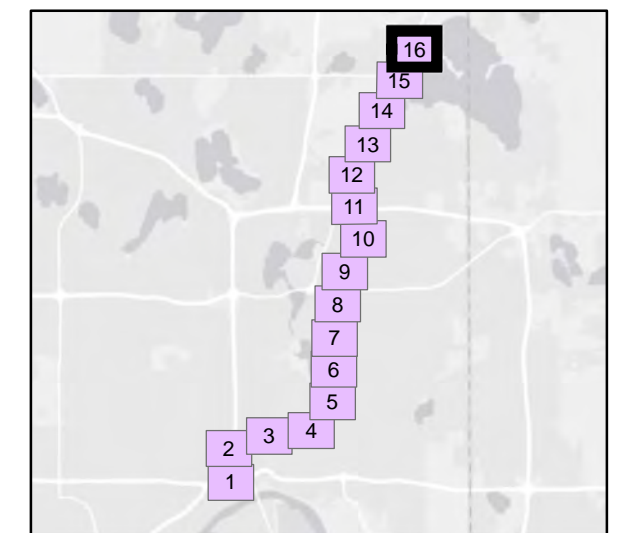
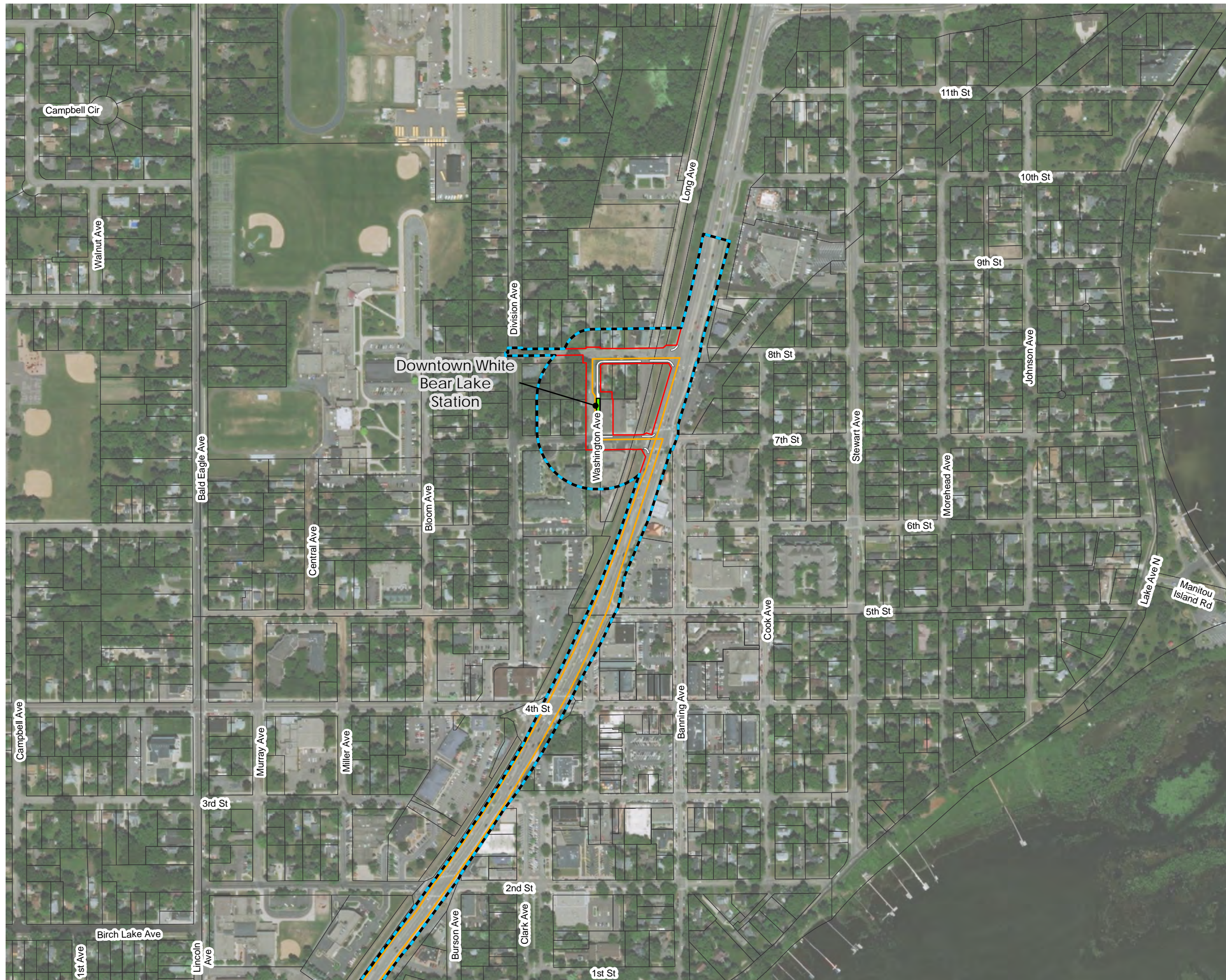
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U.S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION V  
Illinois, Indiana,  
Michigan, Minnesota,  
Ohio, Wisconsin

200 West Adams Street  
Suite 320  
Chicago, IL 60606-5253  
312-353-2789  
312-886-0351 (fax)

October 29, 2019

Sarah J. Beimers, Manager  
Government Programs and Compliance  
MN State Historic Preservation Office  
Minnesota Historical Society  
50 Sherburne Ave, Suite 203  
St. Paul, MN 55155

RE: Section 106 Area of Potential Effects; Metro Transit Rush Line, Twin Cities Region,  
Minnesota; SHPO Number 2019-0985

Dear Ms. Beimers:

As part of its responsibilities under 36 CFR § 800 – Protection of Historic Properties and the National Historic Preservation Act (NHPA), the Federal Transit Administration (FTA) initiated Section 106 consultation with your office for the Rush Line Corridor Bus Rapid Transit (BRT) Project (the Project) in the Twin Cities Region, Minnesota on September 5, 2018.

The Ramsey County Regional Railroad Authority (RCRRA), in conjunction with the Metropolitan Council (the grantee) is proposing to build an approximately 14-mile long Dedicated BRT line from downtown St. Paul to White Bear Lake. There will be approximately twenty stations, including Union Depot in downtown St. Paul and the Maplewood Mall Transit Center. Approximately 85%-90% of the route will be dedicated guideway (only buses allowed), with service every 10 minutes during the morning and afternoon commuter peak hours, 15 minutes during non-peak hours, and 30 minutes during late evening hours.

In compliance with Section 106 of the NHPA, and in accordance with the procedures related to the identification of historic properties described in the implementing regulations at 36 CFR § 800, FTA has determined the Area of Potential Effects (APE) for the Project. The enclosed *APE Parameters Memo* provides details related to the APE and rationale for various project elements throughout the corridor. This correspondence serves as documentation of our determination of the APE, pursuant to 36 CFR § 800.4(a)1.

FTA requests you provide any comments on our determination of the APE following your review of the enclosures. Your timely response will greatly help us incorporate your concerns into the development of the project. For that purpose, we respectfully request that you provide comments within 30 days of receiving this correspondence. Thank you in advance for your

assistance on this project. Please contact Bill Wheeler, Community Planner, at 312-353-2639 or [william.wheeler@dot.gov](mailto:william.wheeler@dot.gov) with any questions.

Sincerely,

Jay M. Ciavarella  
Director, Office of Planning and Program Development

cc: Bill Wheeler, FTA  
Elizabeth Breiseth, FTA  
Marisa Merriman, United States Army Corps of Engineers  
Benjamin Orne, United States Army Corps of Engineers  
Barbara Howard, Minnesota Department of Transportation  
Andrew Gitzlaff, Ramsey County Regional Railroad Authority  
Michael Rogers, Ramsey County Regional Railroad Authority  
Charles Carlson, MetroTransit  
Jeanne Witzig, Kimley-Horn  
Bill Dermody, City of Saint Paul  
George Gause, Saint Paul Heritage Preservation Commission  
Michael Martin, City of Maplewood  
Peter Boulay, Maplewood Heritage Preservation Commission  
Nolan Wall, City of Vadnais Heights  
Anne Kane, City of White Bear Lake  
Bill Short, White Bear Township  
Gloria Tessier, City of Gem Lake

Enclosure:  
APE Maps  
APE Parameters Memo