

Transit Facilities “Checklist”, Guidance and Circulars:
If Using Federal Funds for Any Phase of Work
FTA, Region IV

Preface

The purpose of this “checklist” is to offer a potential grantee seeking Federal funds for any phase of work for a transit facility a “*point of departure*” for researching and understanding the ***myriad Federal requirements for developing a facility***. The checklist is not meant to over-simplify a complicated *real estate, environmental review, public involvement and oversight process* but to offer insights to potential grantees on the areas and issues the grantee will encounter due to Federal rules and regulations adopted over many years. The purpose of these regulations is in part to protect the public, ensure environmental impacts are considered, involve the public in the process and make good and informed investment decisions while minimizing conflict. (NOTE: please also see SAFETEA-LU, Section 6002 for additional information).

Long Range Transportation Plan (LRTP), Metropolitan and State Transportation Improvement Plans (MTIP and STIP)

If the transit facility project is within an urbanized area, please make sure the project is included in the Metropolitan Planning Organization’s (MPO) Long Range Transportation Plan (LRTP) as well as the Metropolitan and State Transportation Improvement Program (MTIP and STIP). Please note that the MTIP and STIP are ***fiscally constrained*** program documents and inclusion of a project in the MTIP may be a matter of negotiation and *funding priority vis-à-vis many other possible projects*. Second, please make sure to have the MPO (if applicable) place the project and appropriate phases within the MTIP; and make sure the state has placed the appropriate phase of the facility in the STIP:

- For example, if using FTA funds for Preliminary Engineering, site selection, land acquisition, site improvements and/or construction please include the phase of work and funding amount (approximate) in the MTIP and STIP
- NOTE: FTA looks to *STIP documentation* as part of the application process
- STIP program pages and approval dates are required as part of the TEAM grant application and must be entered in TEAM (not the MTIP documentation)
- Finally, if within an air quality non-attainment or maintenance area please note Clean Air Act compliance provisions under FTA Circular C 9300.1 a 10-01-98. The MPO’s LRTP will need to be in compliance with the Statewide Implementation Plan (SIP) and relevant motor vehicle emissions budgets (approved by EPA).

Project Feasibility

Identify ***the demand for and the feasibility of a Transit Facility*** to support your funding request and site selection process. Consider the level of due diligence needed to determine feasibility as well as the necessary environmental reviews:

- Consider and/or complete a *detailed scope of work and/or a study* to determine potential sites and the feasibility of such sites for the intended use.

- If you procure consultant services for a study and/or for environmental reviews and documentation, make sure you ***advertise, take competitive proposals in a fair and open procurement and document the “how/why”*** of selection. For example, is the consultant experienced in such studies/scopes/environmental reviews and is the experience well documented, are the items of work and schedules reasonable? Is the consultant flexible and open to public involvement and outreach? Is the budget for the work reasonable? Will additional services likely be needed and are hourly rates well documented? NOTE: Additional services may be likely as a result of Federal reviews or public input and should be anticipated in the study/documentation budget. If an EA or an EIS is being sought, can the consultant document the number and types of NEPA projects completed and the satisfactory award of Records of Decision (ROD) from FTA?

- Determine the proposed uses and develop a site plan and building facility layout to determine if parking, access and circulation are adequate given setbacks within local ordinances.
- Evaluate ***access, floodplain, drainage, sewer and retention issues, topography and grading issues, facility linkages and economic factors such as likely fair market value (FMV) and eventual public ownership***. Determine the site’s suitability for construction of a transit facility and the approximate costs of constructing the desired improvements. Determine the impact of adding impermeable surfaces (asphalt, etc.) and the levels of run-off/retention when considering the site’s suitability. Identify local comprehensive plan, land use and ***zoning (commercial/industrial vs. residential zoning for example)***; and note if the site is zoned for the proposed use? For example, will the site need to be re-zoned and has the re-zoning been completed prior to NEPA documentation?
- Please document any ***public involvement*** in the process of site selection. Make sure there is a level of public involvement consistent with the Participation Plan of the cognizant MPO which can be documented. Public involvement meetings during the course of your study should be considered and you may also want to advertise and hold meetings at the MPO level to get public input and document comments. For example, is the public generally supportive of the facility use and proposed location or is there considerable opposition?

Construction Management Handbook

Please see the web link below for the ***construction management handbook***:

http://www.fta.dot.gov/documents/Construct_Proj_Mangmnt_CD.pdf

Environmental Documentation

- FTA *planning dollars from 5303 and 5307 programs* may be used to fund the provision of NEPA documentation (NOTE: if done, please include reference in the Unified Planning Work Program (UPWP) of the relevant MPO as applicable).
- In order to apply for capital dollars under either the 5307 or 5309 programs, NEPA documentation (also see Categorical Exclusion as indicated in 23 C.F.R. 771.117, below) needs to have been submitted for review by FTA **prior to making a grant application in TEAM** for a capital expenditure.
- The purposes of developing the environmental document include: 1) to protect the natural and social environment; 2) to lead a lay reader through the National Environmental and Policy Act (NEPA) process so that the lay reader can reasonably be expected to understand the logic of this evolutionary process which may have led to the recommended alternative/solution; and 3) to protect the federal and local agency using public funds.
- In addition, the primary reason for NEPA and all its various documents is to arrive at “***good decisions by the parties***” involved. By making an attempt at obtaining the necessary input from the interested and affected parties, we can make better public funding decisions. *Taking “shortcuts”, dismissing possible alternatives without examination and making “simplistic or wrongful assumptions” might result in a flawed environmental document*, which can result in legal delays and other consequences.
- In anticipating and ultimately completing the environmental review and the relevant document, please determine the *type, scope and scale* of the facility and its level of *potential adverse risk* and develop a scope of work for the needed level of environmental review. Please consider ***the class of action*** (emphasizing level of potential adverse impact, degree of certainty with respect to that potential adverse impact, assessment of local accord or discord with the action which together make up the potential risk).
- If procuring consultant services for the environmental documentation, please prepare a detailed scope of work which thoroughly anticipates the myriad issues, alternatives, public comments and re-writes which may be undertaken in the NEPA process and the possibility of additional services.
- A brief synopsis of each of the three types of environmental reviews or “classes of action” are provided as follows:
 - **Categorical Exclusion (23 C.F.R. 771.117)**: Categorical Exclusions (CE’s) are granted for actions that do not individually or cumulatively involve significant social, economic or environmental impacts. The

projects listed in 23 C.F.R. 771.117 involve little or no construction and involve minimal or no effects off-site. The regulation gives a list of the types of projects that are categorically excluded. Once FTA has determined that a CE applies, it may act on the application for financial assistance.

- **Environmental Assessment (23 C.F.R. 771.119):** FTA may require an applicant for financial assistance to prepare an Environmental Assessment (EA) when the significance of the environmental impact is not clearly established. An EA can result in either a Finding of No Significant Impact (23 C.F.R. 771.121) (FONSI) requiring no further environmental evaluation, or identification of potentially significant impacts requiring the applicant to conduct an Environmental Impact Statement (EIS).
 - **Environmental Impact Statement (23 C.F.R. 771.123 et. seq.):** Depending on the nature of the proposed project, FTA may immediately require applicants to develop an Environmental Impact Statement (EIS), or request an EIS based on the outcome of an EA. In either case, the EIS requires that a substantial technical analysis and public review process be conducted to evaluate project alternatives, identify potential social, economic and environmental impacts of the project and designate methods to avoid or mitigate these impacts. **Successful completion of an EIS results in FTA signing a Record of Decision (ROD).** Once FTA has signed a ROD, the applicant can proceed with the project and its various phases of work having completed NEPA and FTA may act on the application for Federal assistance.
- Please note that neither the physical magnitude nor the cost of the project alone are indicators of what the class of action should be--it is the **degree of adverse impact and environmental risk** that point to the class of action. The size and/or the cost of the project do not by themselves determine the class of action.
 - Consider the **alternatives and their relative environmental impacts**. For example, transfer and storage facilities and bus and maintenance facilities may be considered **Categorical Exclusions** by FTA as follows:
 - **Categorical exclusions (CE's)** are often granted by FTA with written documentation provided by the grantee to FTA for actions that do not individually or cumulatively involve significant social, economic or environmental impacts; and for projects listed in 23 C.F.R. 771.117, including:
 - new bus storage and maintenance facilities,
 - rehab or reconstruction of bus storage and maintenance facilities,
 - bus transfer facilities and rail storage facilities, and
 - “Hardship” (to the seller) land acquisition, among others.

- See the *Categorical Exclusion (CE checklist)* at the **end of this document** to consider if your documentation for a proposed CE submittal is adequate.
- NOTE: The presence of “unknown impacts” from development and construction of a transit facility for example, may result in the requirement that the grantee produce a **documented CE** report or study with written documentation beyond that provided by the checklist to be reviewed as to sufficiency by FTA. This is especially true in the case of a land or property assembly where a phase one or two environmental *site* assessment (as differentiated from a NEPA Environmental Assessment) may be required to determine the likelihood of the presence of any contamination. As a general rule, FTA does not provide grants to remove contamination. The presence of contamination should be thoroughly researched in the process of completing the documented CE report.
- Review the appropriate environmental requirements in various circulars on the FTA web site. For example, please see FTA Circular C 9300.1 A 10-01-98 from the FTA Capital Projects circular:

- b. Projects That May Have an Environmental Impact. A second group of bus category projects involve more construction and greater potential for off-site impacts. Examples are new construction or expansion of bus terminals and transfer facilities, bus storage and maintenance garages, office facilities, and transit centers with park-and-ride facilities. For these projects, the grant applicant must prepare environmental documentation with appropriate technical analysis to support a categorical exclusion, if appropriate, or a finding of no impact (FONSI), depending on the scope and magnitude of the probable environmental impacts.

Experience has shown that many construction projects can be built and operated without causing impacts if they are carefully sited in areas with compatible, non-residential land use where the primary access roads are adequate to handle the additional bus traffic. FTA may approve the designation of these construction projects as categorical exclusions if the grant applicant provides documentation which clearly demonstrates that the conditions stated above are met and that no adverse effects will result. Grant applicants should refer to the list of categorical exclusions requiring FTA approval contained in the joint FHWA/FTA environmental regulations.

For any project not meeting the conditions for a categorical exclusion, the grant applicant must prepare an Environmental Assessment (EA) which documents the impacts of the proposed project and considers alternatives to the proposed site or design. An EA is subject to public comment.

If environmental impacts are identified for a bus category project, an Environmental Impact Statement (EIS) will be required. For example, the new construction or extension of a separate roadway for buses or high-occupancy vehicles which is not located within an existing highway right-of-way normally requires an EIS.

Federal regulations place limitations on project development while the NEPA process is being conducted. Grant applicants should refer to Chapter VI; paragraph 7 in which the limitations are discussed.

- c. Clean Air Act Compliance. In nonattainment and maintenance areas, federally assisted transportation projects must comply with the conformity requirements of the Clean Air Act Amendments of 1990. In order to receive

Federal funding, transportation plans, programs, and projects must be found to conform to applicable state implementation plans (SIPs) for air quality. The proposed bus improvement must be included in a current long-range plan and transportation improvement program (TIP), which have been determined to conform to the SIP.

In general, any project expected to have a quantifiable effect on region-wide, transportation-related emissions in an air quality non-attainment area must be included in the regional emissions analysis required for the area's transportation plan and TIP. In addition, some large bus projects (e.g., new inter-modal terminals) must be analyzed for their potential localized impact on air quality. This is normally accomplished as part of the environmental analysis undertaken to comply with the National Environmental Policy Act (NEPA). The FTA Regional Office can provide guidance on how to analyze the localized air quality impacts of various bus projects.

Many bus category projects are exempted from the conformity requirements because they are presumed to have a negligible effect on regional and localized air quality. The grant applicant should refer to the Environmental Protection Agency (EPA) regulations governing the conformity process, for a complete list of exempt projects. There may be cases in which a normally exempt transit project will require an air quality analysis and a conformity determination; hence, the grant applicant should review the proposed project with the FTA Regional Office to decide whether an exemption is appropriate. FTA's exemption determination is usually made in consultation with the agencies responsible for the area's air quality attainment plan.

- When the **environmental impacts are uncertain**, than an Environmental Assessment (EA) may be required. When this is the case, the EA is prepared with relevant documentation to determine the impacts. If there are no, few or minor impacts, than a *Finding of No Significant Impact (FONSI)* will be prepared by the grantee and reviewed by FTA for possible FTA signature
- During the preparation of environmental documentation, if it is determined that **significant environmental impacts** will result, than an Environmental Impact Statement (EIS) must be considered (40 C.F.R. 1508.9).
- The presence of one or more conditions may require **special studies** and the documentation of archaeological, cultural, ecological, historical, parks and water impacts and may further indicate the need for an EIS. The preparation of an EIS or such special studies is beyond the scope of this checklist. (NOTE: Please see the **National Historic Preservation Act, Section 106** and the **Federal Transit Act, Section 4 (f)** for additional information with regard to properties eligible for or on the National Register (in some cases properties 50 years old or older may need to be surveyed for historical significance and projects which impact parkland may need special studies).
- Obtain the review of FTA Region IV of the applicable environmental documentation (CE, FONSI Class III or ROD Class I documentation review) **prior to submitting an application for funds to FTA in TEAM.**

- When the environmental reviews are complete, consider “pinning” the **environmental documentation to a pending application in TEAM** using the “gem clip” feature in TEAM (to attach a scanned document).
- **NOTE: A NEPA document is a Federal document, and while the local sponsor (grantee) may recommend an alternative as the preferred alternative, the Federal sponsor is the ultimate decision maker of the alternative’s appropriateness for Federal funding.**

Intermodal Transportation Facility: Level Boarding & Freight Issues

Level-boarding compatibility issues must be examined in facilities where AMTRAK and commuter rail trains may be using the same platform or facility. AMTRAK and other trains may have different platform and doorway heights and various “low floor” measures of doorways (17.5, 22 or 48 inches on older trains) may create level boarding challenges. Grantees should make contact with the Civil Rights Officer in Region IV if there is a question with regard to level boarding. The *Disability Law Coordinating Council* has written guidance on these level boarding and platform issues on the FTA web site:

http://www.fta.dot.gov/civilrights/ada/civil_rights_3890.html

In addition, *if an intermodal facility is proposed along an existing rail freight line or a proposed high speed rail corridor* (Atlanta to Richmond) than reviews by the Federal Railway Administration (FRA) are required to ensure that freight and passenger rail routes (and potential conflicts) are reviewed. In addition, transit facilities built within a curve may result in a “gap” in excess of that allowed or which can be bridged between the platform and the doorway of the train. Prospective stations have been moved due to this “gap” issue. Care should be taken to consider this station location in light of platform/doorway gaps, level boarding and freight queues. Finally, if an existing heavy rail line is being extended coordination with FTA in regard to level boarding compatibility is critical. Older systems may find fleet replacement and level boarding challenges. *The FRA contact is Dick Cogswell at 202.493.6388.*

***PM 2.5 Particulate Matter—Non-Attainment Areas
Possible Conformity Determination***

If the proposed transit facility is located within a non-attainment area for particulate matter (PM-2.5), the applicant may need to address ***a project conformity determination for PM-2.5 from diesel exhaust.*** According to 40 C.F.R. 93.123(b)(1)(iv), FTA and EPA may become involved via “interagency coordination” with the applicant. For example, projects of air quality concern with a “significant increase” in diesel buses at transit transfer facilities could result in a “CO hot-spot”. The PM-2.5 non-attainment areas (in or partially in Region IV) include the following areas:

- Atlanta, Birmingham, Chattanooga, Cincinnati-Hamilton, Greensboro, Winston-Salem, High Point, Hickory, Huntington-Ashland, Knoxville, Louisville, Macon or Rome, GA.

Safety and Security Management Plans (SSMP)

For ***major capital projects***, the requirements for a Safety and Security Management Plan (SSMP) are outlined in FTA Circular 5800.1 - Safety and Security Management Guidance. Please review the ***Safety and Security Management Plan Circular 5800.1*** on the FTA web site regarding the new requirements in SAFETEA-LU for new ***major capital projects*** undertaken after August 1, 2007.

Real Estate

- Consider the following ***real estate property acquisition and relocation*** guidance from the following FTA web sites and links:
 - 49 C.F.R Part 24, see below for Uniform Relocation Act and Real Estate requirements for the Federal Government

http://www.fta.dot.gov/planning/planning_environment_5937.html

- Please review section 1.3.3.4 - Real Estate Contracts of the FTA, Best Practices Procurement Manual (BPPM) that deals with the acquisition of Real Property (grantees are urged to obtain and review the BPPM):

http://www.fta.dot.gov/funding/thirdpartyprocurement/bppm/grants_financing_6102.html

Requirements related to the acquisition, use and disposal of real property may be found in the following regulations (see also FTA web site, and type in Circular name or number in the "Search" box:

- a. FTA Circular 5010.1C, Grant Management Guidelines, Chapter II-2 Real Property. This Circular defines the requirements of the Federal Transit Laws that are codified at 49 U.S.C. Chapter 53.
- b. 49 CFR §18.31 Real Property, and 49 CFR Part 24, Subpart B Real Property Acquisition.
- c. FTA Master Agreement (MA (12) Section 19. The acquisition of real property, either by purchase or lease, is not subject to the requirements of FTA Circular 4220.1E. Real property is defined in 49 CFR Section 18.3 as "land, including land improvements, structures and appurtenances thereto, excluding movable machinery and equipment." The acquisition of easements and rights of way are considered real estate acquisitions and the requirements discussed herein pertain to these types of acquisitions.

Real property acquisition, use and disposal is covered by FTA Circular 5010.1C, Chapter II-2; 49 CFR Part 18.31; 49 CFR Part 24 Subpart B; and by the FTA Master Agreement, Section 19.1. It is important that the grantee be familiar with the requirements established by FTA in

Circular 5010.1C, Chapter II-2. This circular establishes procedures to be followed by grantees in the following areas:

- The conduct of Hazardous Waste Site Assessments before acquiring real property.
 - The conduct of an independent appraisal by a certified appraiser.
 - The requirement for a review appraisal of the initial appraisal.
 - FTA review and concurrence requirements related to grantee's offer to buy property.
 - Incidental use of acquired real property as a means to supplement transit revenues.
 - Disposition of excess real property by sale, transfer to other programs.
 - Requirement to prepare excess property utilization plan for real property no longer used for its original purpose.
- Appraisals and review appraisals (“hard copy”) completed by an appraiser will be required and must be completed **prior to preparing an application for funds in TEAM** if property/parcel acquisitions with a value of \$ 500,000 * (as of November 1, 2008) or greater are to be acquired for the facility, as follows:
 - Have **“hard-copy” appraisals and a summary cover letter** from the applicant/grantee) sent to FTA Region IV for FTA headquarters (HQ) review (if acquisition cost > \$ 500,000 per property/parcel)
 - FTA HQ will provide a review memo for sufficiency of documentation to Region IV and FTA Region IV will notify applicant/grantee of results
 - Value determination is not the FTA’s responsibility and approval does not constitute FTA’s agreeing with the value, but only sufficiency
 - FTA Region IV will **not be able to process a grant request** in TEAM for land acquisition unless the **‘hard-copy’ appraisals have first been reviewed** and approved by HQ
 - Appraisals should be dated within six months of the proposed purchase and/or updated accordingly.
 - Other real estate issues should be addressed in the **Project Detail narrative in TEAM when the application is entered in TEAM**, as follows:
 - Is the facility *zoned for transit facility use*? Who will own the facility?
 - Will there be non-transit related retail or other tenants in the facility?
 - If yes, will they pay rent and will be the disposition of rents?
 - Will parking be provided, and if so, will it be adequate for bus and automobile circulation?
 - **NOTE: the facility must be ADA accessible with curbs, ramps and other ADA improvements** and the application should indicate such.

Purchase of Real Estate & “Earmark Funds”

Because of the Uniform Act, appraisal and NEPA requirements, the purchase of property with earmark funds by a grantee that has not completed the numerous Federal actions described herein is **discouraged**. Grantees who try to purchase property with earmarks without completing the Uniform Act, appraisal and NEPA documents are going to find there may be challenges completing the above requirements in proper sequence and may be risking a lapsing earmark (or the possible future use of Federal funds).

Early Acquisition of Real Estate is “At-Risk”

Grantees should understand that “*early acquisition*” of property is “*at risk*” to the grantee and a failure to complete the Uniform Act and appraisal requirements may jeopardize the use of Federal funds on the project. Grantees are strongly urged to respect the appraisal and Uniform Act requirements if there is a chance that Federal funds will be sought for the project.

Use of Land as an In-Kind Match for Federal Funds

- See Circulars/Rules as follows:

Common Grant Rule at 49 CFR 18.24 "Matching or Cost Sharing." (2) FTA's administration of this authority is in FTA C5010.1C, "Grant Management Guidelines," Chapter II, "Management of Real Property, Equipment & Supplies."

Also see 42 U.S.C. 61, Section 4627
<http://www4.law.cornell.edu/uscode/42/4627.html>

Uniform Relocation Assistance and Real Property Acquisition Act

- See also the following on relocation assistance procedures:

The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, may be viewed at: <http://www.fhwa.dot.gov/realestate/act.htm>

The implementing regulations (government-wide) are found in 49 CFR Part 24
<http://a257.g.akamaitech.net/7/257/2422/01jan20051800/edocket.access.gpo.gov/2005/05-6.htm>

Davis-Bacon Wage Rate Determination & Buy America Provisions

Grantees should be aware of the Dept. of Labor wage determination and certification process under the Davis-Bacon Act. Applications in TEAM are routinely sent to the DOL for labor certifications prior to approval. Project facility budgets may need to anticipate Davis-Bacon wage rates and labor reviews. Grantees should also be made aware of *Buy America* provisions when purchasing materials and equipment.

The CE Information “Checklist” is attached on the next page.

* NOTE: Circulars are in process of being updated and will change from time to time.

Date _____

Grant Applicant _____

**INFORMATION REQUIRED FOR PROBABLE
CATEGORICAL EXCLUSION
(SECTION 771.117(d))**

_____ A. **DETAILED PROJECT DESCRIPTION:**

_____ B. **LOCATION (INCLUDING ADDRESS):**

Attach a site map or diagram, which identifies the land uses and resources on the site and the adjacent or nearby land uses and resources. This is used to determine the probability of impact on sensitive receptors (such as schools, hospitals, residences) and on protected resources.

_____ C. **METROPOLITAN PLANNING & AIR QUALITY CONFORMITY:**

Is the proposed project "included" in the current adopted MPO plan, either explicitly or in a grouping of projects or activities? What is the conformity status of that plan? Is the proposed project, or are appropriate phases of the project included in the TIP? What is the conformity status of the TIP?

_____ D. **ZONING:**

Description of zoning, if applicable, and consistency with proposed use.

_____ E. **TRAFFIC IMPACTS:**

Describe potential traffic impacts; including whether the existing roadways have adequate capacity to handle increased bus and other vehicular traffic.

_____ F. **CO HOT SPOTS:**

If there are serious traffic impacts at any affected intersection, and if the area is non-attainment for CO, demonstrate that CO hot spots will not result.

_____ G. **HISTORIC RESOURCES:**

Describe any cultural, historic, or archaeological resource that is located in the immediate vicinity of the proposed project and the impact of the project on the resource.

_____ H. **NOISE:**

Compare the distance between the center of the proposed project and the nearest noise receptor to the screening distance for this type of project in FTA's guidelines. If the screening distance is not achieved, attach a "General Noise Assessment" with conclusions.

_____ I. **VIBRATION:**

If the proposed project involves new or relocated steel tracks, compare the distance between the center of the proposed project and the nearest vibration receptor to the screening distance for this type of project in FTA's guidelines. If the screening distance is not achieved, attach a "General Vibration Assessment" with conclusions.

_____ J. **ACQUISITIONS & RELOCATIONS REQUIRED:**

Describe land acquisitions and displacements of residences and businesses.

_____ K. **HAZARDOUS MATERIALS:**

If real property is to be acquired, has a Phase I site assessment for contaminated soil and groundwater been performed? If a Phase II site assessment is recommended, has it been performed? What steps will be taken to ensure that the community in which the project is located is protected from contamination during construction and operation of the project? State the results of consultation with the cognizant State agency regarding the proposed remediation?

_____ L. **COMMUNITY DISRUPTION & ENVIRONMENTAL JUSTICE:**

Provide a socio-economic profile of the affected community. Describe the impacts of the proposed project on the community. Identify any community resources that would be affected and the nature of the effect.

_____ M. **USE OF PUBLIC PARKLAND AND RECREATION AREAS:**

Indicate parks and recreational areas on the site map. If the activities and purposes of these resources will be affected by the proposed project, state how.

_____ N. **IMPACTS ON WETLANDS:**

Show potential wetlands on the site map. Describe the project's impact on on-site and adjacent wetlands.

_____ O. **FLOODPLAIN IMPACTS:**

Is the proposed project located within the 100-year floodplain? If so, address possible flooding of the proposed project site and flooding induced by proposed project due to its taking of floodplain capacity.

_____ P. **IMPACTS ON WATER QUALITY, NAVIGABLE WATERWAYS, & COASTAL ZONES:**

If any of these are implicated, provide detailed analysis.

_____ Q. **IMPACTS ON ECOLOGICALLY-SENSITIVE AREAS AND ENDANGERED SPECIES:**

Describe any natural areas (woodlands, prairies, wetlands, rivers, lakes, streams, designated wildlife or waterfowl refuges, and geological formations) on or near the proposed project area. If present, state the results of consultation with the state department of natural resources on the impacts to these natural areas and on threatened and endangered fauna and flora that may be affected.

_____ R. **IMPACTS ON SAFETY AND SECURITY:**

Describe the measures that would need to be taken to provide for the safe and secure operation of the project after its construction.

_____ S. **IMPACTS CAUSED BY CONSTRUCTION:**

Describe the construction plan and identify impacts due to construction noise, utility disruption, debris and spoil disposal, air and water quality, safety and security, and disruptions of traffic and access to property.

The action described above meets the criteria for a NEPA categorical exclusion (CE) in accordance

with 23 CFR Part 771.117 _____.

Applicant's Environmental Reviewer

Date

FTA Grant Representative