MDT
Montana Department of Transportation
2701 Prospect Avenue
PO Box 201001
Helena MT 59620-1001

Jim Lynch, Director
Brian Schweitzer, Governor

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AUG 11 2011
ENVIRONMENTAL

August 10, 2011

Kevin L. McLaury
Division Administrator
Federal Highway Administration
585 Shepard Way
Helena, MT 59601-9785

MASTER FILE COPY

Attention: Alan Woodmansey

Subject: Categorical Exclusion
IM 90-9(116)506
BATTLEFLD INT FLD REPR/MT11-1
CN 7730 000

This is to request approval of this proposed project as a Categorical Exclusion (CE) under the provisions of 23 CFR 771.117(d), and the Programmatic Agreement as signed by the Montana Department of Transportation (MDT) and the FHWA on April 12, 2001. A copy of its Preliminary Field Review Report/Scope of Work Report (August 5, 2011) is attached. This proposed action also qualifies as a CE under ARM 18.2.261 (Sections 75-1-103 and 75-1-201, MCA).

The following form provides the documentation required to demonstrate that all of the conditions are satisfied to qualify for a Programmatic Categorical Exclusion Approval (PCE) as initially agreed by the (former) MONTANA DEPARTMENT OF HIGHWAYS (MDOH) and the FHWA on December 6, 1989. (Note: An " X " in the "N/A" column is "Not Applicable" to, while one in the "UNK" column is "Unknown" at the present time for this proposed project.)

NOTE: A response in a box will require additional documentation for a Categorical Exclusion request in accordance with 23 CFR 771.117(d).

	YES	NO	N/A	UNK
1. This proposed project would have (a) significant environmental impact(s) as-defined under 23 CFR 771.117(a).	☐	☒	☐	☐
2. This proposed project involves (an) unusual circumstance(s) as described under 23 CFR 771.117(b).	☐	☒	☐	☐
3. This proposed project involves one (or more) of the following situations where:				
A. Right-of-Way, easements, and/or construction permits would be required.	☐	☒	☐	☐

	YES	NO	N/A	UNK
1. The context or degree of the Right-of-Way action would have (a) substantial social, economic, or environmental effect(s).	☐	☒	☐	☐
2. There is a high rate of residential growth in this proposed project's area.	☐	☒	☐	☐
3. There is a high rate of commercial growth in this proposed project's area.	☐	☒	☐	☐
4. Work would be on and/or within approximately 1.6 kilometers (1± mile) of an Indian Reservation.	☒	☐	☐	☐
5. There are parks, recreational, or other properties acquired/improved under *Section 6(f)* of the *1965 National Land & Water Conservation Fund Act* (16 USC 460L, *et seq.*) on or adjacent to proposed the project area.	☐	☒	☐	☐
The use of such *Section 6(f)* sites would be documented and compensated with the appropriate agencies. (*e.g.*: MDFWP, local entities, etc.).	☐	☐	☒	☐
6. Are there any sites either on, or eligible for the National Register of Historic Places with concurrence in determination of eligibility or effect under *Section 106* of the *National Historic Preservation Act* (16 USC 470, *et seq.*) by the State Historic Preservation Office (SHPO), which would be affected by this proposed project.	☐	☒	☐	☐
7. There are parks, recreation sites, school grounds, wildlife refuges, historic sites, historic bridges, or irrigation that might be considered under *Section 4(f)* of the 1966 *US DEPARTMENT OF TRANSPORTATION Act* (49 USC 303) on or adjacent to the project area.	☐	☒	☐	☐
a. The proposed project would not impact the site(s), so a 4(f) evaluation is not necessary.	☐	☐	☒	☐
b. De minimis finding(s) is/are necessary for this project.	☐	☐	☒	☐
c. "Nationwide" Programmatic *Section 4(f)* Evaluation forms for these sites are attached.	☐	☐	☒	☐
d. This proposed project requires a full (*i.e.*: DRAFT & FINAL) *Section 4(f)* Evaluation.	☐	☐	☒	☐
B. The activity would involve work in a streambed, wetland, and/or other waterbody(ies) considered as "waters of the United States" or similar (*e.g.*: "state waters").	☐	☒	☐	☐

	YES	NO	N/A	UNK
1. Conditions set forth in *Section 10* of the *Rivers and Harbors Act* (33 USC 403) and/or *Section 404* under 33 CFR Parts 320-330 of the *Clean Water Act* (33 USC 1251-1376) would be met.	☐	☐	☒	☐
2. Impacts in wetlands, including but not limited to those referenced under Executive Order (E.O.) #11990, and their proposed mitigation would be coordinated with the US Army Corps of Engineers and other Resource Agencies (Federal, State and Tribal) as required for permitting	☐	☐	☒	☐
3. A 124SPA Stream Protection Authorization would be obtained from the MDFWP?	☐	☒	☐	☐
4. There is a delineated floodplain in the proposed project area under FEMA's Floodplain Management criteria.	☐	☐	☒	☐
The water surface at the 100-year flood limit elevation would exceed floodplain management criteria due to an encroachment by the proposed project.	☐	☐	☒	☐
5. Tribal Water Permit would be required.	☐	☒	☐	☐
6. Work would be required in, across, and/or adjacent to a river which is a component of, or proposed for inclusion in Montana's Wild and/or Scenic Rivers system as published by the US Department of Agriculture, or the US Department of the Interior.	☐	☒	☐	☐
The designated National Wild & Scenic River systems in Montana are:				
a. Middle Fork of the Flathead River (headwaters to South Fork confluence).	☐	☐	☒	☐
b. North Fork of the Flathead River (Canadian Border to Middle Fork confluence).	☐	☐	☒	☐
c. South Fork of the Flathead River (headwaters to Hungry Horse Reservoir).	☐	☐	☒	☐
d. Missouri River (Fort Benton to Charles M. Russell National Wildlife Refuge).	☐	☐	☒	☐
In accordance with *Section 7* of the *Wild and Scenic Rivers Act* (16 USC 1271 – 1287), this work would be coordinated and documented with either the Flathead National Forest (Flathead River), or US Bureau of Land Management (Missouri River).	☐	☐	☒	☐

	YES	NO	N/A	UNK
C. This is a "Type I" action as defined under 23 CFR 772.5(h), which typically consists of highway construction on a new location or the physical alteration of an existing route which substantially changes its horizontal or vertical alignments or increases the number of through-traffic lanes.	☐	☒	☐	☐
1. If yes, are there potential noise impacts?	☐	☐	☒	☐
2. A Noise Analysis would be completed.	☐	☐	☒	☐
3. There would be compliance with the provisions of both 23 CFR 772 for FHWA's Noise Impact analyses and MDT's Noise Policy.	☒	☐	☐	☐
D. There would be substantial changes in access control involved with this proposed project.	☐	☒	☐	☐
If yes, would they result in extensive economic and/or social impacts on the affected locations?	☐	☐	☒	☐
E. The use of a temporary road, detour, or ramp closure having the following conditions when the action(s) associated with such facilities:				
1. Provisions would be made for access by local traffic, and be posted for same.	☒	☐	☐	☐
2. Adverse effects to through-traffic dependant businesses would be avoided or minimized.	☒	☐	☐	☐
3. Interference to local events(*e.g.*: festivals) would be minimized to all possible extent.	☒	☐	☐	☐
4. Substantial controversy associated with this pending action would be avoided.	☒	☐	☐	☐
F. Hazardous wastes /substances, as defined by the US Environmental Protection Agency (EPA) and/or the Montana Department of Environmental Quality (MDEQ), and/or (a) listed "Superfund" (under *CERCLA* or *CECRA*) site(s) are currently on and/or adjacent to this proposed project.	☒	☐	☐	☐
All reasonable measures would be taken to avoid and/or minimize substantial impacts from same.	☒	☐	☐	☐
G. The Montana Pollutant Discharge Elimination System's conditions (ARM 16.20.1314), including temporary erosion control features for construction would be met.	☒	☐	☐	☐
H. Permanent desirable vegetation with an approved seeding mixture would be established on exposed areas.	☒	☐	☐	☐

	YES	NO	N/A	UNK
I. Documentation of an "invasive species" review to comply with both EO #13112 and the *County Noxious Weed Control Act* (7-22-21, MCA), including directions as specified by the county(ies) wherein its intended work would be done.	☒	☐	☐	☐
J. There are "Prime" or "Prime if Irrigated" Farmlands designated by the Natural Resources Conservation Service on or adjacent to the proposed project area.	☐	☐	☒	☐
If the proposed work would affect Important Farmlands, then an AD-1006 Farmland Conversion Impact Rating form would be completed in accordance with the *Farmland Protection Policy Act* (7 USC 4201, *et seq.*).	☐	☐	☒	☐
K. Features for the *Americans with Disabilities Act* (PL 101-336) compliance would be included.	☐	☐	☒	☐
L. A written Public Involvement Plan, would be completed in accordance with MDT's Public Involvement Handbook.	☒	☐	☐	☐
4. This proposed project complies with the *Clean Air Act*'s *Section 176(c)* (42 USC 7521(a), as amended) under the provisions of 40 CFR 81.327 as it's either in a Montana air quality:				
A. "Unclassifiable"/attainment area. This proposed project is not covered under the EPA's September 15, 1997 Final Rule on air quality conformity.	☒	☐	☐	☐
and/or				
B. "Nonattainment" area. However, this type of proposed project is either exempted from the conformity determination requirements (under EPA's September 15, 1997 Final Rule), or a conformity determination would be documented in coordination with the responsible agencies: (Metropolitan Planning Organizations, MDEQ's Air Quality Division, etc.).	☐	☐	☒	☐
C. Is this proposed project in a "Class I Air Shed" (Indian Reservations) under 40 CFR 52.1382(c)(3)?	☐	☒	☐	☐
5. Federally listed Threatened or Endangered (T/E) Species:				
A. There are recorded occurrences, and/or critical habitat in this proposed project's vicinity.	☐	☒	☐	☐
B. Would this proposed project result in a "jeopardy" opinion (under 50 CFR 402) from the Fish & Wildlife Service on any Federally listed T/E Species?	☐	☐	☒	☐

The proposed project would not induce significant land use changes, nor promote unplanned growth. There would be no significant effects on access to adjacent property, nor to present traffic patterns.

This proposed project would not create disproportionately high and/or adverse impacts on the health or environment of minority and/or low-income populations (EO #12898). It also complies with the provisions of *Title VI* of the *Civil Rights Act* of 1964 (42 USC 2000d) under the FHWA's regulations (23 CFR 200).

In accordance with the provisions of 23 CFR 771.117(a), this pending action would not cause any significant individual, secondary, or cumulative environmental impacts. Therefore, the FHWA's concurrence is requested that this proposed project is properly classified as a Categorical Exclusion.

Eric Thunstrom, Date: 8/10/2011
Eric Thunstrom -Project Development Engineer
MDT Environmental Services Bureau

Concur Heidy Bruner, Date: 8/10/11
Heidy Bruner, P.E. - Engineering Section Supervisor
Environmental Services Bureau

Concur _____, Date: 10 AUG 2011
Federal Highway Administration

MDT attempts to provide accommodation for any known disability that may interfere with a person participating in any service, program or activity of the Dept. Alternative accessible formats of this information will be provided upon request. For further information, call 406-444-7228 or TTY (800-335-7592), or call Montana Relay at 711.

Attachment: Preliminary Field Review Report/Scope of Work Report (August 5, 2011)

e-copy (w/o attach.):	Stefan Streeter, P.E.	Billings District Administrator
	Paul R. Ferry, P.E.	Highway Engineer
	Tom S. Martin, P.E.	Chief, Environmental Services Bureau
	Heidy Bruner, P.E.	Environmental Services Bureau
	Suzy Price	Contract Plans Bureau Chief
	Dawn Stratton	Fiscal Programming Section
	Alyce Fisher	Fiscal Programming Section
	Robert Stapley	Right-of-Way Bureau Chief
	Alan Woodmansey, P.E.	FHWA Operations Engineer
	Tom Gocksch, P.E.	Environmental Services
	Montana Legislative Branch Environmental Quality Council (EQC)	

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Montana Department of Transportation
PO Box 201001
Helena, MT 59620-1001

Memorandum

To: Distribution

From: Paul Ferry, P.E.
Highways Engineer

Date: August 5, 2011

Subject: **IM-SFCI 90-9(115)506**
Battlefield Int Fld Repr/MT11-1
UPN 7730000
Project Work Type – 140 – Reconstruction w/o added capacity

Attached is the Preliminary Field Review Report/Scope of Work Report which was approved on __*8/8/2011*_____. We request that those on the distribution review this report and submit your concurrence within two weeks of the approval date.

Your comments and recommendations are also requested if you do not concur or concur subject to certain conditions. When all personnel on the distribution list have concurred, and the environmental documentation is approved, we will submit this report to the Preconstruction Engineer for approval.

I recommend approval:
Approved _____ Date _____

Distribution:
Stefan Streeter, District Administrator
Kent Barnes, Bridge Engineer
Tom Martin, Environmental Services Bureau Chief
Roy Peterson, Traffic and Safety Engineer
Robert Stapley, Right-of-Way Bureau Chief
Lynn Zanto, Rail, Transit, & Planning Division Administrator
Jake Goettle, Construction Engineering Services Bureau
Matt Strizich, Materials Engineer
Jon Swartz, Maintenance Administrator

cc:
Dawn Stratton, Fiscal Programming Section
Damian Krings, Road Design Engineer
Master Highways file
Rod Nelson, Project Design Manager

e-copies:
Jim Walther, Engineering, Preconstruction Engineer
Lesly Tribelhorn, Highways Design Engineer
Mark Goodman, Hydraulics Engineer
Dave Leitheiser, District Hydraulics Engineer
Bonnie Gundrum, Env. Resources Section Supervisor
Bill Semmens, District Biologist
Tom Gocksch, District Project Development Engineer
Danielle Bolan, Traffic Engineer
Leroy Wosoba, District Traffic Project Engineer
Kraig McLeod, Safety Engineer
Jeff Olsen, Bridge Area Engineer
Matt Strizich, Materials Engineer
Dan Hill, Pavement Analysis Engineer
Cameron Kloberdanz, District Geotechnical Manager
Bryce Larsen, Supervisor, Photogrammetry & Survey
Marty Beatty, Engineering Information Services
Paul Grant, Public Involvement Officer
Jean Riley, Planner
Jake Goettle, Construction Bureau – VA Engineer
Gary Neville, District Preconstruction Manager
Rod Nelson, District Projects Engineer
Brent McCann, District R/W Field Supervisor
Jonell Gillaspie, District R/W Design
Ron Cebuhar, District Field R/W Agent
Bill Henning, District Materials Lab
Walt Scott, R/W Utilities Section Supervisor
David Hoerning, R/W Engineering Manager
Greg Pizzini, Acquisition Manager
Joe Zody, R/W Access Management Section Manager
Paul Johnson, Project Analysis Bureau
Sue Sillick, Research Section Supervisor
Dawn Stratton, Fiscal Programming
Alyce Fisher, Fiscal Programming
Randy Roth, District Maintenance Chief
Aaron Eschler, District Design Supervisor

Montana Department of Transportation
PO Box 201001
Helena, MT 59620-1001

Memorandum

To: Paul Ferry, P.E.
Highways Engineer

From: Gary Neville
District Engineering Services Supervisor

Date: August 5, 2011

Subject: **IM-SFCI 90-9(115)506**
Battlefield Int Fld Repr/MT11-1
UPN 7730000
Project Work Type – 140 – Reconstruction w/o added capacity

Please approve the attached Preliminary Field Review Report/Scope of Work Report.

Approved *Paul Ferry* Date *8/8/11*
Paul Ferry, P.E.
Highways Engineer

The same report is also being distributed under a separate cover as a Scope of Work Report for comments and approval recommendations.

cc (w/attach.):
Damian Krings, Road Design Engineer

Introduction

This project was reviewed as part of a District-wide flood damage analysis field trip on June 20-22, 2011. The following personnel attended the review:

Ryan Dahlke	Highways	Helena
Cameron Kloberdanz	Geotechnical	Helena
Dave Leitheiser	Hydraulics	Helena
Bill Semmens	Environmental	Helena
Aaron Eschler	District Design	Billings
Gary Neville	District Preconstruction	Billings
Randy Roth	Maintenance	Billings

Proposed Scope of Work

The proposed project has been nominated as an emergency project to repair sections of roadway and inslopes that have failed due to flooding of the Little Bighorn River. This repair work will include the following:

- Replace eroded inslopes with CAC on a 6:1 slope, then topsoil and seed
- Along I-90 and the Battlefield Interchange, replace the damaged pavement sections with 1.5' of CAC and 0.50' of PMS
- Where digouts are required, place geotextile and geogrid between the subgrade and CAC
- Mill/fill the intersection of Makawasha Ave. and Bala St. (Frontage Road) to a depth of 0.15' (tracked and paid separately with state funds)
- Overlay the Frontage Road, east of I-90, from RP 1.0 to RP 1.2 to a depth of 0.2' (tracked and paid separately with state funds)
- Repair 2 approaches within the right-of-way off of the west Frontage Road (tracked and paid separately with state funds)
- Replace damaged fencing
- New pavement markings

Purpose and Need

The purpose of this project is to provide repairs to the roadway, slopes, and fencing that was damaged during the recent flooding and heavy rainfall. The intent of the project is to re-establish the roadway to the pre-damaged condition and stabilize the facility as necessary.

Project Location and Limits

The project has multiple locations in Big Horn County: The first has various sites along I-90 from approximately RP 509.6 to RP 511.2; the second is the Makawasha Ave. and Bala St. intersection in Crow Agency; and the final location is the adjacent east frontage road from RP 1.0 to RP 1.2. I-90 is functional classified as a freeway in level terrain with a design speed of 70 mph. This section of I-90 was last reconstructed in 1960 and a mill/fill was done in 2008 with IM 90-9(99)509 from RP 508.7 to RP 516.7.

Work Zone Safety and Mobility

At this time, Level 2 construction zone impacts are anticipated for this project as defined in the Work Zone Safety and Mobility (WZSM) guidance. The plans package will include a Transportation Management Plan (TMP) consisting mainly of a Traffic Control Plan (TCP). A limited Transportation Operations (TO) component and a limited Public Information (PI) component to address delays and detours will also be included in the plan package. These issues are discussed in more detail under the Traffic Control and Public Involvement sections.

Physical Characteristics

The general terrain in this area is level and in a semi-rural location. I-90 crosses the Little Bighorn River at both ends of the project. The horizontal and vertical alignment will be used as-is. The Little Bighorn Battlefield Interchange is within the project limits. This section of I-90 was last reconstructed in 1960 and a mill/fill was done in 2008 with IM 90-9(99)509 from RP 508.7 to RP 516.7. According to the road log, the existing top surfacing width is 38 feet and the typical section contains about 8.6 inches of asphalt surfacing and 19 inches of gravel base. The 2010 Pavement Management System's pavement condition and 2011 treatment recommendations are a Ride 82.5, rut 76.1, ACI 100, and MCI 98.2 with a recommended treatment of do nothing.

No as-built or road log information was available for the frontage road or the Makawasha intersection. However, field measurements and cores were done. The frontage road has a 23' top width with a plant mix depth of 0.4'. The Makawasha intersection width varies from 27' wide to 46' wide and the plant mix depth varies from 0.36' to 0.75'.

Traffic Data

Traffic Data is not available at this time, and likely will not be needed since the intent of the project is to repair the facility to safe operating condition. If it is determined at a later date that traffic data is required, it will be obtained at that time.

Crash Analysis

A crash analysis was not performed due to the intent of the project. We are requesting via this report that the Traffic Safety Section investigate if there are crash clusters or other crash data worth noting within the project limits. If it is determined at a later date that a full crash analysis is required, it will be obtained at that time.

Major Design Features

a. **Design Speed.** The design speed for this project is 70 mph. The posted speed limits within the project 75 mph.
b. **Horizontal Alignment**. The horizontal alignment will be used as-is. No alterations other than repair of the facility will be completed.
c. **Vertical Alignment**. The vertical alignment will be used as-is. No alterations other than repair of the facility will be completed.
   Typical Sections and Surfacing. In areas where the surfacing has failed, a new surfacing section will be constructed. The finished top width will match the existing adjacent sections. The intent is to reestablish the roadway to the pre-damaged condition.

   Here are the Surfacing Section recommendations:

   I-90 digouts will have 0.50 feet of asphalt plant mix on top of 1.5 feet of CAC matching the existing widths. Geotextile and geogrid will be placed on top of the subgrade and below the CAC.

   The Frontage Road will receive a 0.20' PMS overlay with a 23' top width.

   The Makawasha/Bala intersection will have a 0.15' mill/fill between the curb lines extending beyond the curb radii to the extent of the old surfacing.

d. **Geotechnical Considerations**. In the digout locations, geogrid and stabilization geotextile will be placed between the subgrade and CBC to provide needed stability and separation of the subgrade.

e. **Hydraulics**. We are investigating a long term solution to alleviate the potential for flooding in this area. However, this will not be included in this project. Because of this, a Location Hydraulics Study Report will not be needed for this project.
A new 2' diameter CSP was installed across the frontage road during the flooding and is in good condition.
f. **Bridges.** The Little Bighorn Battlefield Interchange, which includes the bridge over I-90, is within the project limits. No work will be done to the bridge, but beneath the bridge some inslope repair will be required.
g. **Traffic.** No alterations to traffic elements are proposed.
h. **Pedestrian/Bicycle/ADA**. No changes to the existing pedestrian/bicycle/ADA features are proposed. No dedicated pedestrian/bicycle facilities exist.
i. **Miscellaneous Features**. New fence will be required around the southeast and west areas of the Battlefield Interchange due to debris from flooding. Fence will be replaced that has been bent over and/or wire separated. Guardrail warrants will not be evaluated.
j. **Context Sensitive Design Issues**. No context sensitive design elements are proposed.

Other Projects
No other projects are currently planned for letting this federal fiscal year near this project. There are, however, several other emergency repair projects being developed in the Billings District that could be tied for letting with this project.

Location Hydraulics Study Report
A Location Hydraulics Study Report will not be written. No hydraulic needs are anticipated.

Design Exceptions
Due to the limited scope of work, the existing geometrics, and finished top width will be perpetuated. No design exceptions are anticipated at this time.

Right-of-Way
No new right-of-way is necessary.

Access Control
No changes to the access control are proposed.

Utilities/Railroads
RR tracks parallel the interstate on the West side. We will not encroach upon the RR right-of-way to construct this project.
There are a couple of existing underground utility conduits that have been exposed due to erosion on the south side of the Battlefield Interchange. They may need to be relocated. If they are to remain in those locations, the contractor will need to take great care when working there.
There are some water valves and a manhole that will need to be adjusted when resurfacing the Makawasha intersection.

Intelligent Transportation Systems (ITS) Features
There are no ITS solutions proposed.

Survey
No additional survey is needed.

Public Involvement
Public involvement for the project will consist of a notice of an ER project on MDT's web page.

Environmental Considerations
An individual categorical exclusion will be prepared for this project. Because of the time-sensitive nature of the project, this scope of work report is being distributed now. However, the formal scope of work approval will not be completed until the environmental document is completed and approved.

Energy Savings/Eco-Friendly Considerations
No energy savings or eco-friendly considerations have been identified.

Experimental Features
No experimental features are being proposed for this project.

Traffic Control
A Transportation Management Plan (TMP) consisting of a Traffic Control Plan (TCP), a limited Transportation Operations (TO) component and a limited Public Information (PI) component is appropriate for this project. Traffic will be maintained on the roadway and construction will take place under traffic.

Project Management
The Billings District office will be the design lead on this project with Rod Nelson as the Project Design Manager. This project is not under full FHWA oversight.

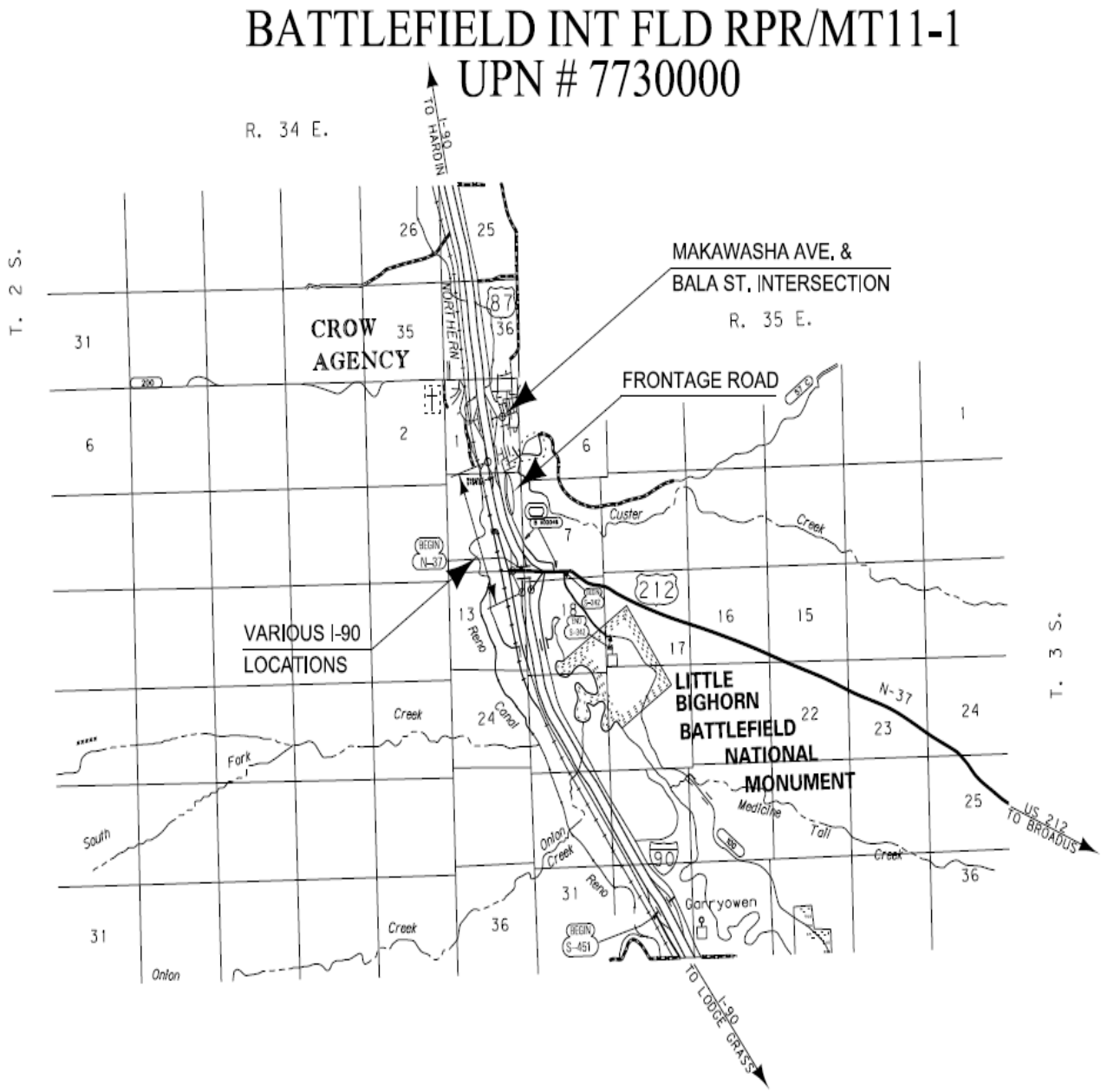
Preliminary Cost Estimate

	Estimated cost	Inflation (INF) (from PPMS)	TOTAL costs w/INF + IDC (from PPMS)
Road Work	187,391		
Traffic Control	30,000		
Subtotal	217,391		
Mobilization (15%)	32,609		
Subtotal	250,000		
Contingencies (10%)	25,000		
Total CN	**$ 275,000**	**$ 36,131**	**$ 341,124**
CE (10%)	**$ 27,500**	**$ 3,613**	**$ 34,112**
TOTAL CN+CE	**$ 302,500**	**$ 39,744**	**$ 375,236**

Note:
The frontage road and the Makawasha & Bala intersection portions of the project will be tracked and paid separately using state funds. The CN for the state funded portion is estimated to be $95,000.
Inflation is calculated in PPMS to the letting date. Inflation based on no letting date in PPMS, the project is planned to be let in September 2011. IDC is calculated at 9.64% as of FY 2012.

Ready Date

A formal Ready Date will not be set, due to the time-sensitive nature and expedited development and schedule. A September 8, 2011 Letting Date has been assigned, and the project is on-track to be delivered accordingly.

Site Map

The project site map is attached.