

**SOUTHWEST LIGHT RAIL TRANSIT PROJECT  
(METRO GREEN LINE EXTENSION)**  
Section 106 Memorandum of Agreement



**Quarterly Report No. 21  
(June 1, 2021 – August 31, 2021)**

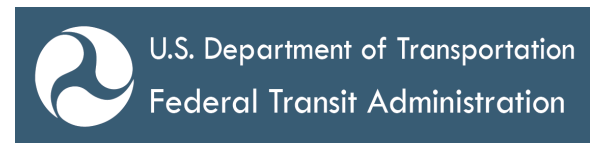
**Prepared by:**

Minnesota Department of Transportation  
395 John Ireland Boulevard  
Saint Paul, Minnesota 55155-1899



**On behalf of:**

Federal Transit Administration  
Region V  
200 West Adams Street, Suite 320  
Chicago, IL 60606



and

Metropolitan Council  
Southwest LRT Project Office  
6465 Wayzata Boulevard, Suite 500  
St. Louis Park, MN 55426



September 2021

# Introduction

The Southwest Light Rail Transit (LRT) (METRO Green Line Extension) Project (Project) is an approximately 14.5-mile long extension of the METRO Green Line (Central Corridor LRT). The line will operate from downtown Minneapolis through the communities of St. Louis Park, Hopkins, Minnetonka, and Eden Prairie, passing in close proximity to Edina. The project includes 16 new stations, a new rail support facility in Hopkins, an expansion of the existing Franklin Operation and Maintenance Facility in Minneapolis, approximately 2,500 additional park-and-ride spaces, accommodations for passenger drop off, bicycle and pedestrian access, and new or restructured local bus routes connecting stations to nearby destinations.

The Project sponsor, the Metropolitan Council, may receive funding from the Federal Transit Administration (FTA) and permits from the United States Army Corps of Engineers (USACE) to construct the Project. Therefore, the Project is a federal undertaking and must comply with Section 306108 (previously Section 106 and hereinafter referred to as Section 106) of the National Historic Preservation Act of 1966, as amended (54 United States Code § 306108) and its implementing regulations, 36 Code of Federal Regulations (CFR) Part 800 et. seq. In accordance with 36 CFR Part 800.2(a)(2), the USACE has recognized FTA as the lead federal agency responsible for fulfilling their collective responsibilities for the Project under Section 106.

Pursuant to 36 CFR Part 800 et. seq., FTA, with assistance from the Minnesota Department of Transportation Cultural Resources Unit, consulted with the Minnesota Historic Preservation Office and other interested parties to define an Area of Potential Effect (APE), conduct surveys to identify and evaluate historic properties within the APE for the National Register of Historic Places, assess effects of the Project on historic properties, and resolve adverse effects. The measures FTA agreed to implement as part of the Project to avoid, minimize, and mitigate adverse effects on historic properties are documented in the *Memorandum of Agreement between the Federal Transit Administration and the Minnesota Historic Preservation Office Regarding the Southwest Light Rail Transit (METRO Green Line Extension) Project, Hennepin County, Minnesota (MOA)*, which was executed on June 21, 2016.

This quarterly summary report was prepared to meet the reporting requirements of MOA Stipulation X.A. It provides an itemized listing of all measures required to implement the terms of the MOA, identifies actions FTA has taken during the reporting period to implement those measures, and includes a timetable of activities proposed for implementation within the following reporting period. It also identifies any problems or unexpected issues encountered during the reporting period, any proposed scheduling changes, any disputes and objections submitted or resolved as part of FTA's efforts to carry out the terms of the MOA, and any changes recommended in implementation of the MOA.

# Acronyms and Abbreviations

The following is a list of commonly used acronyms and abbreviations that may be found in the reporting table in the Implementation Efforts section of this report.

APE	Area of Potential Effect
BNSF	Burlington Northern Santa Fe Railway
COR	Change Order Request
Council	Metropolitan Council
CRU	Cultural Resources Unit
FTA	Federal Transit Administration
GN	Great Northern Railway
HPC	Heritage Preservation Commission
LRT	Light Rail Transit
MHPR	Minnesota Historic Property Record
MnDOT	Minnesota Department of Transportation
MnHPO	Minnesota Historic Preservation Office
MOA	Memorandum of Agreement
MPRB	Minneapolis Park and Recreation Board
NRHP	National Register of Historic Places
OMF	Operations and Maintenance Facility
Project	Southwest Light Rail Transit/METRO Green Line Extension
Q1	Quarter of the year, in this example, the First Quarter
RSF	Rail Support Facility
SCADA	Supervisory Control and Data Acquisition
SOI	Secretary of the Interior
StPM&M	St. Paul, Minneapolis & Manitoba Railroad
TPSS	Traction Power Substation(s)
WPA	Works Progress Administration

# Implementation Efforts

This is quarterly report No. 21 prepared under the terms of the Project MOA and covers the reporting period from June 1, 2021, through August 31, 2021.

Table 1. MOA Implementation

MOA Action Item	Implementation Schedule	Implementation Status
<b>Stipulation I. Project Design Development</b>		
<ul style="list-style-type: none"> <li>• Design Review - SOI's Standards for the Treatment of Historic Properties</li> </ul>	On-going through completion of the 100% Plans, anticipated schedule: Q3 2016-2022	On-going, also see Stipulations II, III, VI and VII, XII and Table 2: StPM&M / GN Historic District Measure I
<ul style="list-style-type: none"> <li>• Design Review – Non-SOI's Standards for the Treatment of Historic Properties</li> </ul>	On-going through completion of the 100% Plans, anticipated schedule: Q3 2016-2022	On-going, also see Stipulations II and XII
<b>Stipulation II. Pre-Construction Design Review</b>		
<ul style="list-style-type: none"> <li>• Review of 90% Plans<sup>1</sup></li> </ul>	<ul style="list-style-type: none"> <li>• General Project: Q3 2016</li> <li>• Project modifications related to the Council's Agreements with BNSF: anticipated Q2-Q4 2018, also see Stipulation III and Table 2: StPM&amp;M / GN Historic District Measure I</li> <li>• Project modifications related to Franklin OMF expansion, Hopkins RSF, and combined bid packages: anticipated Q3 2018-Q4 2020, also see Review of 100% Plans</li> </ul>	<p>In process.</p> <ul style="list-style-type: none"> <li>• Completed August 2016 for Project as a whole.</li> <li>• Project modifications <ul style="list-style-type: none"> <li>○ Project modifications required by and related to the Council's Agreements with BNSF: Completed January 2019. Also see Stipulation III and Table 2: StPM&amp;M / GN Historic District Measure I.</li> <li>○ Completed October 2020. Also see Review of 100% Plans below and Stipulation III.</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>• Review of 100% Plans</li> </ul>	<p>To be completed prior to the start of Project construction, but will be completed in stages as 100% Plans for different Project construction packages are completed, anticipated schedule: Q4 2016-Q1 2022</p> <ul style="list-style-type: none"> <li>• Civil: Q4 2016-Q1 2017</li> </ul>	<p>In process.</p> <ul style="list-style-type: none"> <li>• Civil 100% Plans: Completed February 2017.</li> <li>○ Review of Addenda: Completed August 2018.</li> </ul>

<sup>1</sup> In accordance with MOA Stipulation II, MnDOT CRU and FTA identified two scope changes and several Civil Construction addenda items that necessitated revision of the Project's Archaeological and Architecture/History APEs. One of these scope changes included the expansion of the existing Franklin OMF. The Hopkins OMF, included in the scope when FTA issued its Section 106 final determination of effect for the Project on November 10, 2015, was removed. The Hopkins site will include a rail support facility (RSF). Operations and maintenance functions previously included at Hopkins OMF will be accommodated at the existing Franklin OMF that was originally constructed to serve the METRO Blue Line. Franklin OMF will require modifications to increase capacity and expand. The size of the OMF will not change. The Franklin OMF expansion was previously part of the Blue Line Extension LRT Project (SHPO #2011-3773). Franklin OMF was transferred from the Blue Line Extension LRT Project to the Southwest Line Rail Transit Project in Q4 2018.

MOA Action Item	Implementation Schedule	Implementation Status
	<ul style="list-style-type: none"> <li>○ Addenda: Q3 2017-Q3 2018</li> <li>○ Project Modifications related to the Council's Agreements with BNSF: anticipated Q3 2018-Q4 2018, also see Stipulation III and Table 2: StPM&amp;M / GN Historic District Measure I</li> <li>○ CORs: anticipated Q4 2018-2022</li> <li>• Systems and Tunnel Facilities: Q1 2017-Q3 2020</li> <li>• Hopkins RSF: anticipated Q4 2021</li> <li>• SCADA: Q3-Q4 2020</li> <li>• Kenilworth Corridor Landscape: anticipated 2022</li> <li>• WPA Walls: anticipated Q1-Q2 2017, also see Stipulation VII</li> <li>• Franklin OMF: Q3 2020-Q4 2020</li> </ul>	<ul style="list-style-type: none"> <li>○ Review of the 100% Plans for Project modifications required by and related to the Council's Agreements with BNSF as required by the mitigation plan for the StPM&amp;M / GN Historic District: Completed April 2019. Also see below, Stipulation III and Table 2: StPM&amp;M / GN Historic District Measure I.</li> <li>• WPA Walls: Completed April 2017, also see Stipulation VII.</li> <li>• Systems and Tunnel Facilities: Completed September 2020.</li> <li>• Franklin OMF Expansion and SCADA: Completed October 2020.</li> <li>• Kenilworth Corridor Landscape: In process, on hold.</li> <li>• See Stipulation XII for a summary of CORs reviewed during the reporting period.</li> </ul>
<b>Stipulation III. Resolution of Additional Adverse Effects</b>	As needed during duration of MOA implementation (Q2 2016-Q2 2026)	
• StPM&M / GN Historic District	Q4 2017-Q2 2018	Completed, Mitigation Plan implementation in process. Also see Stipulation II and Table 2: StPM&M / GN Historic District Measure I.
• Properties in Areas Added to the APE	As needed: anticipated Q4 2018-Q4 2020	Saloon/The Joint (HE-MPC-05085) and Warehouse/The Cabooze (HE-MPC-19116) Assessment of Effects: Completed October 2020
<b>Stipulation IV. Construction Protection Plan</b>		
• Construction Protection Plan	To be completed prior to the start of Project construction, anticipated schedule: Q3 2018-Q4 2018 <ul style="list-style-type: none"> <li>• Revisions: Q4 2018-Q1 2019</li> </ul>	Completed March 2019. Plan originally completed in April 2017 and revised in Q1 2019. Also see Stipulation XII.
• Vibration Management and Remediation Monitoring Reporting		
○ Pre-Construction Survey Reporting	To be completed prior to the start of Project construction, anticipated schedule: Q2 2019-2022	In process. Inspection survey work is complete and report review and revisions are ongoing.
○ Post-Construction Survey Reporting	On-going during Project construction, to be completed in the quarter following completion of Project construction, anticipated timeframe: Q1 2020-2022	Not started

MOA Action Item	Implementation Schedule	Implementation Status
○ Construction Vibration Monitoring	On-going during Project construction, anticipated timeframe Q2 2019-2022.	On-going. Construction vibration monitoring conducted during this reporting period includes: <ul style="list-style-type: none"> <li>• Minneapolis &amp; St. Louis Railway Depot: Active monitoring, no recorded exceedances of vibration limit.</li> <li>• Kenilworth Lagoon (GRHD) WPA retaining walls: Active monitoring, no recorded exceedances of vibration limit.</li> <li>• Chicago, Milwaukee, St. Paul &amp; Pacific Railroad Depot: No active monitoring, no high vibration activities nearby.</li> <li>• Peavey-Haglin Experimental Concrete Elevator: No active monitoring, no high vibration activities nearby.</li> </ul>
<b>Stipulation V. Archaeological Sites 21HE0436 and 21HE0437</b>		
• Phase III Data Recovery	To be completed prior to the start of Project construction in the vicinity of Sites 21HE0436 and 21HE0437, completed February 2021	Completed February 2021. Data recovery fieldwork was completed on June 22, 2018. The Council and MnDOT CRU reviewed the first draft of the report in Q2 2019. MnDOT CRU completed the second draft review in October 2020 and FTA completed its review of the report in January 2021. While not a requirement of the MOA, the final report was submitted to consulting parties on February 22, 2021. No MnHPO review is required.
<b>• Interpretation of Archaeological Sites</b>		
○ Draft Interpretative Plan	Q2-Q3 2016	Completed May 2016
○ Final Interpretative Plan	To be completed after completion of Phase III Data Recovery, anticipated schedule: Q2 2020- Q4 2021	In process. MnHPO provided comments on the draft interpretative plan on May 27, 2016. The City of Minneapolis and Minneapolis HPC provided comments on June 10, 2016. To the extent feasible, the Council incorporated these comments into the final interpretative plan. The revised interpretative plan that included Phase III Data Recovery information was submitted for MnHPO and consulting parties for review on April 22, 2021. MnHPO agreed that the interpretative plan submittal was sufficient on June 3, 2021.
○ Installation of Interpretation at Royalston Station	To be installed after the Final Interpretative Plan is approved and finished before Project construction is completed, anticipated timeframe: Q3 2021-2022	Not started
○ Website to Interpret Sites 21HE0436 and 21HE0437	To be developed after the Final Interpretative Plan is approved and completed prior to initiation of revenue service operations, anticipated timeframe: Q3 2021-2023	Not started

MOA Action Item	Implementation Schedule	Implementation Status
<b>Stipulation VI. Chicago, Milwaukee, St. Paul &amp; Pacific Railroad Depot</b>		
<ul style="list-style-type: none"> <li>• Design measures to avoid adverse effect: relocate crossover tracks in front of depot 3,420' west and shift noise wall in front of depot 240' west</li> </ul>		
<ul style="list-style-type: none"> <li>○ Incorporate design revisions into 90% Plans</li> </ul>	Q2-Q3 2016	Completed August 2016
<ul style="list-style-type: none"> <li>○ Consult on revised design prior to completion of 100% Plans</li> </ul>	To be completed prior to the final 100% Plans, anticipated schedule: Q3 2016-Q1 2017, also see Stipulation II for timeline of completion of 100% Plans for different Project construction packages	Completed October 2016
<ul style="list-style-type: none"> <li>○ Incorporate design revisions into 100% Plans</li> </ul>	To be completed prior to the final 100% Plans, anticipated schedule: Q3 2016-Q4 2019, also see above and Stipulation II for timeline of completion of 100% Plans for different Project construction packages	Completed September 2020. MnDOT CRU will continue to review new CORs as necessary during the next reporting period. See above, below and Stipulations II and XII.
<ul style="list-style-type: none"> <li>• Review of revised design</li> </ul>	See Stipulations II and XII	Completed September 2020. MnDOT CRU will continue to review new CORs as necessary during the next reporting period. Also see above and Stipulations II and XII.
<b>Stipulation VII. Grand Rounds Historic District</b>		
<ul style="list-style-type: none"> <li>• Kenilworth Lagoon Noise Mitigation</li> </ul>		
<ul style="list-style-type: none"> <li>○ Incorporate design into Project Plans</li> </ul>	To be completed prior to the start of Project construction: Q3 2016-Q1 2017	Completed February 2017
<ul style="list-style-type: none"> <li>○ Construct noise mitigation</li> </ul>	To be completed prior to the completion of Project construction, anticipated timeframe: Q2 2020-2021	In process.
<ul style="list-style-type: none"> <li>• Additional design consultation prior to completion of the 100% Plans</li> </ul>	Q3 2016-Q2 2017	Completed June 2017
<ul style="list-style-type: none"> <li>• Kenilworth Lagoon WPA Rustic Style Retaining Walls</li> </ul>		



MOA Action Item	Implementation Schedule	Implementation Status
○ Construction plans	To be completed prior to the start of any Project construction in the vicinity of the WPA walls, anticipated schedule: Q3 2016-Q2 2017, also see Stipulation II	Completed April 2017. Also see Stipulation II.
○ Deconstruction and reconstruction of wall portion under the Project's Kenilworth Crossing and rehabilitation of wall portions beyond the crossing	To be completed prior to the completion of Project construction, anticipated timeframe: Q2 2019-2021	In process, on hold. Wall segments that needed to be deconstructed to build the freight rail bridge were documented and deconstructed in Q3 2019. Documentation and deconstruction of the remaining segment that needed to be removed for LRT bridge construction was completed on Q3 2020. Rehabilitation and reconstruction work will begin after the channel bridges are completed. Also see Stipulation IV.
● Plans for the Grand Rounds Historic District: Canal System		
○ Preservation Plan	To be completed prior to initiation of revenue service operations, anticipated timeframe: 2019-2023	In process. As noted in Quarterly Report No. 14, the MPRB, with collaboration from the Council and assistance from MnDOT CRU, is preparing a preservation plan for the portion of the Grand Rounds Historic District: Canal Segment included within the Cedar Lake-Lake of the Isles Master Plan, intended to meet the requirements of MOA Stipulation VII. Due to the barriers in gathering feedback from a broad audience during Covid-19 in 2020, MPRB extended community engagement through the summer of 2021. The full community engagement summary report will be shared during Community Advisory Committee Meeting on September 9, 2021. At that meeting, the committee will draft a vision and set of guiding principles that will shape draft concept plans that will be created during the next reporting period.
○ Treatments Plan	To be completed prior to initiation of revenue service operations, anticipated timeframe: 2021-2023	Not started
<b>Stipulation VIII. Hopkins Commercial Historic District</b>		
● National Register of Historic Places Nomination	Work on nomination to be initiated within 6 months of MOA execution and completed prior to initiation of revenue service operations, anticipated timeframe: Q4 2016-2021	In process. The draft nomination was submitted to MnHPO and consulting parties for review and on April 13, 2021. MnHPO provided comments on July 16, 2021. MnDOT CRU will submit the draft nomination for State Review Board review in the next reporting period.

MOA Action Item	Implementation Schedule	Implementation Status
<ul style="list-style-type: none"> <li>Public Education</li> </ul>	To be completed prior to initiation of revenue service operations, anticipated timeframe: 2021	In process. On August 5, 2021 a flyer was sent to property owners notifying owners of public meetings. On July 17, 2021 at Hopkins Raspberry Festival information was provided to the public on the Hopkins Commercial Historic District and National Register nomination. Public education will continue in the next reporting period.
<b>Stipulation IX. Standards</b>		
<ul style="list-style-type: none"> <li>Carry out work pursuant to the MOA in accordance with the <i>SOI's Standards for Archaeology and Historic Preservation</i></li> </ul>	Duration of MOA implementation, anticipated timeframe: Q2 2016-Q2 2026, or earlier if all MOA measures implemented	On-going
<ul style="list-style-type: none"> <li>FTA oversight to ensure that all activities carried out pursuant to the MOA are done by, or under the direct supervision of, historic preservation professionals who meet the <i>SOI's Professional Qualifications Standards</i></li> </ul>	Duration of MOA implementation, anticipated timeframe: Q2 2016-Q2 2026, or earlier if all MOA measures implemented	On-going
<b>Stipulation X. Monitoring and Reporting</b>		
<ul style="list-style-type: none"> <li>Quarterly MOA Implementation Summary Report</li> </ul>	Every 3 months following MOA execution until it expires or is terminated, anticipated schedule: Q3 2016-Q2 2026, or earlier if all MOA measures implemented	On-going. Quarterly summary report for previous reporting period submitted to MnHPO on June 9, 2021. Next quarterly report to be prepared and submitted at end of next reporting period.
<b>Stipulation XI. Coordination with Other Federal Reviews</b>	As needed for the duration of MOA implementation, anticipated timeframe: Q2 2016-Q2 2026, or earlier if all MOA measures implemented	On-going, as needed, no activity during reporting period, also see Stipulation II.
<b>Stipulation XII. Review Process During Construction</b>		
<ul style="list-style-type: none"> <li>Plan for Unexpected Discoveries</li> </ul>	To be developed and included as part of the Construction Protection Plan, anticipated schedule: Q3 2016-Q1 2019 <ul style="list-style-type: none"> <li>Revisions: Q4 2018-Q1 2019</li> </ul>	Completed March 2019. Plan originally completed in April 2017 and revised in Q1 2019. Also see Stipulation IV.
<ul style="list-style-type: none"> <li>Project Modifications</li> </ul>	After the completion of the 100% Plans, through the completion of Project construction, anticipated timeframe: Q2 2019-2023	In process. Civil construction began in May 2019. <ul style="list-style-type: none"> <li>During this reporting period MnDOT CRU reviewed CORs to the 100% Plans to determine potential for changes that would result in a change of effect to a historic property and adherence to SOI's Standards where required. A total of 78 Civil CORs were provided by the Council for potential review, of</li> </ul>

MOA Action Item	Implementation Schedule	Implementation Status
		<p>which 77 were determined by the Council to not require review due to no potential to effect historic properties. A total of 8 Systems and Tunnel Facilities CORs were provided by the Council for potential review, of which all were determined to not require review due to no potential to effect historic properties. A total of 26 Franklin OMF CORs were provided by the Council for potential review, of which all were determined not the require review due to no potential to effect historic properties.</p> <p>MnDOT CRU will continue to review new CORs during the next reporting period. If MnDOT CRU identifies any substantive changes, it will notify FTA of its findings. If FTA finds the item will result in a change of effect to a historic property, it will notify MnHPO and other consulting parties and will consult as appropriate.</p>
<ul style="list-style-type: none"> <li>Historic Properties Discovered or Unexpectedly Affected as a Result of Project Construction</li> </ul>	As needed during Project construction, anticipated timeframe: Q3 2016-Q2 2026, or earlier if all MOA measures implemented	During this reporting period, MnDOT CRU was notified of two unexpected discoveries of footings from the non-extant Laurel Avenue bridge over the StPM&M / GN yards. Both discoveries are features of the StPM&M / GN Historic District and were documented for inclusion in the MHPR. Also see Table 2, Measure II.
<b>Stipulation XIII. Dispute Resolution</b>	As needed during duration of MOA implementation, anticipated timeframe: Q2 2016-Q2 2026, or earlier if all MOA measures implemented	On-going, as needed, no activity during reporting period
<b>Stipulation XIV. Duration, Amendments, and Termination</b>	As needed during duration of MOA implementation, anticipated timeframe: Q2 2016-Q2 2026, or earlier if all MOA measures implemented	On-going, as needed, no activity during reporting period

Table 2. Adverse Effect Mitigation Plan Implementation

StPM&M / GN Historic District Mitigation Plan Action Item	Implementation Schedule	Implementation Status
<b>Measure I. Project Design Development</b>		
<ul style="list-style-type: none"> <li>Design Review - SOI's Standards for the Treatment of Historic Properties</li> </ul>	On-going through completion of the 100% Plans, anticipated schedule: Q3 2017-2022, also see Table 1: Stipulations I and II	On-going, also see MOA Stipulations I, II, III, VI, VII and XII.
<ul style="list-style-type: none"> <li>Review of 90% Plans</li> </ul>	Project modifications related to the Council's Agreements with BNSF: Q2-Q4 2018	Completed January 2019. Also see MOA Stipulations II and III.

StPM&M / GN Historic District Mitigation Plan Action Item	Implementation Schedule	Implementation Status
<ul style="list-style-type: none"> <li>Review of 100% Plans</li> </ul>	<ul style="list-style-type: none"> <li>Project modifications related to the Council's Agreements with BNSF: Q3 2018-Q2 2019</li> <li>Plans for interpretative element: anticipated, Q2 2020-Q4 2021 also see Measure III</li> </ul>	Completed April 2019. Also see MOA Stipulations II, III and XII.
<b>Measure II. MHPR</b>		
<ul style="list-style-type: none"> <li>Level II MHPR for the StPM&amp;M / GN Historic District (Linden Avenue to 12<sup>th</sup> Street North)</li> </ul>	To be completed prior to the start of any Project construction within and in the vicinity of the StPM&M / GH Historic District, anticipated schedule: Q3 2018-2021, also see Table 1: Stipulation III	In process. Initial fieldwork completed on October 30, 2018. Two features of the StPM&M / GN Historic District were documented during this reporting period. Work on the document will continue during the next reporting period. Also see MOA Stipulation XII.
<b>Measure III. Interpretation of the StPM&amp;M / GN Historic District</b>		
<ul style="list-style-type: none"> <li>Draft Interpretative Plan</li> </ul>	Anticipated schedule: 2021	Not started
<ul style="list-style-type: none"> <li>Final Interpretative Plan</li> </ul>	Anticipated schedule: 2021-2022	Not started
<ul style="list-style-type: none"> <li>Review of 60% Plans for Interpretation</li> </ul>	Anticipated schedule: 2021-2022	Not started
<ul style="list-style-type: none"> <li>Review of 100% Plans for Interpretation</li> </ul>	Anticipated schedule: 2022	Not started
<ul style="list-style-type: none"> <li>Installation of Interpretation</li> </ul>	To be installed after the Final Interpretative Plan is approved and finished before Project construction is completed, anticipated timeframe: 2022-2023	Not started
<ul style="list-style-type: none"> <li>Website to Interpret the StPM&amp;M / GN Historic District</li> </ul>	To be developed after the Final Interpretative Plan is approved and completed prior to initiation of revenue service operations, anticipated timeframe: 2022-2023	Not started