

Appendix B. Agency Correspondence

Correspondence Included in Appendix B

From	To	Date	Subject
Federal Agencies			
U.S. Environmental Protection Agency, Kathy Triantafillou	Federal Highway Administration (FHWA) Bethaney Bacher-Gresock	12/16/22	Cooperating Agency status acceptance
U.S. Environmental Protection Agency, Elizabeth Pelloso	FHWA, Bethaney Bacher-Gresock and Wisconsin Department of Transportation Southwest Region (WisDOT SW Region), Dan Schave	8/16/23	EIS Scoping comments
U.S. Environmental Protection Agency, Krystle Z. McClain	FHWA, Lisa Hemesath and WisDOT SW Region, David Schmidt	2/29/24	Agency Concurrence Point 1
U.S. Environmental Protection Agency, Krystle Z. McClain	FHWA, Lisa Hemesath and WisDOT SW Region, David Schmidt	4/30/24	Agency Concurrence Point 2
U.S. DOT FHWA	Tribal Chairs and Tribal Historic Preservation Officers	12/9/22	Tribal coordination invitation
Forest County Potawatomi Historic Preservation Office, Benjamin Rhodd	WisDOT SW Region, David Schmidt	2/9/24	Tribal coordination
USDOI NPS Ice Age Scenic Trail	FHWA, Bethaney Bacher-Gresock	8/10/23	Agency coordination
USDOI NPS Ice Age Scenic Trail	WisDOT SW Region, David Schmidt	5/15/24	Agency Concurrence Point 2
U.S. Army Corps of Engineers	WisDOT SW Region, Frank Pritzlaff	2/7/23	Cooperating agency coordination
U.S. Army Corps of Engineers	WisDOT SW Region, David Schmidt	2/26/24	Agency Concurrence Point 1
U.S. Army Corps of Engineers	WisDOT SW Region, David Schmidt	5/7/24	Agency Concurrence Point 2
Natural Resources Conservation Service U.S. Department of Agriculture. Jeffrey Deniger, Resource Soil Scientist	HNTB Corporation, Zach Zopp	1/25/24	Farmland Conversion Impact Rating Form Review for Columbia County
Natural Resources Conservation Service U.S. Department of Agriculture. Jeffrey Deniger, Resource Soil Scientist	HNTB Corporation, Zach Zopp	1/25/24	Farmland Conversion Impact Rating Form Review for Dane County

From	To	Date	Subject
Natural Resources Conservation Service U.S. Department of Agriculture. Jeffrey Deniger, Resource Soil Scientist	HNTB Corporation, Zach Zopp	1/25/24	Farmland Conversion Impact Rating Form Review for Juneau County
Natural Resources Conservation Service U.S. Department of Agriculture. Jeffrey Deniger, Resource Soil Scientist	HNTB Corporation, Zach Zopp	1/25/24	Farmland Conversion Impact Rating Form Review for Sauk County
Natural Resources Conservation Service U.S. Department of Agriculture. David Gundlach	HNTB Corporation, Caron Kloser	3/1/24	Wetland Reserve Program (WRP) coordination
Natural Resources Conservation Service U.S. Department of Agriculture. David Gundlach	HNTB Corporation, Caron Kloser	3/7/24	Wetland Reserve Program (WRP) coordination
Farm Service Agency, U.S. Department of Agriculture. Ian H. Krauss Agricultural Program Specialist	HNTB Corporation, Zach Zopp	2/22/24	Conservation Reserve Program (CRP) coordination
State Agencies			
Wisconsin Department of Natural Resources	WisDOT SW Region, Brian Taylor	12/12/22 – 1/12/23	Participating agency coordination
Wisconsin Department of Natural Resources	WisDOT SW Region, Dan Schave	8/17/23	Comments on NOI
Wisconsin Department of Natural Resources, Andy Barta, Eric Heggelund, Environmental Analysis & Review Specialists	WisDOT SW Region, Frank Pritzlaff	10/17/23	Response to Information Request
Wisconsin Department of Natural Resources	WisDOT SW Region, David Schmidt	2/14/24	Agency Concurrence Point 1
Wisconsin Department of Natural Resources	WisDOT SW Region, David Schmidt	5/2/24	Agency Concurrence Point 2
Wisconsin Department of Agriculture, Trade, and Consumer Protection	WisDOT SW Region, Frank Pritzlaff	12/12/22 - 12/19/22	Participating agency coordination
Wisconsin Department of Agriculture, Trade, and Consumer Protection	WisDOT SW Region, David Schmidt	2/9/24	DATCP Concurrence Statement

From	To	Date	Subject
Wisconsin Department of Agriculture, Trade, and Consumer Protection	HNTB Corporation, Zach Zopp	2/23/24	Conservation Reserve Enhancement Program (CREP) coordination
Wisconsin Department of Agriculture, Trade, and Consumer Protection, Kirsten K Biefeld	WisDOT SW Region, David Schmidt	4/30/24	Agency Concurrence Point 2
Local Agencies			
Village of DeForest, Bill Chang, Administrator	WisDOT SW Region, Dan Schave	8/14/23	Comments on Alternatives
Village of DeForest, Bill Chang, Administrator	WisDOT SW Region, Jennifer Kobryn	1/3/24	Review of plans for proposed improvements
Greater Madison MPO, William Schaefer, Planning Manager	WisDOT SW Region, Frank Pritzlaff	1/24/23	Participating agency coordination
Greater Madison MPO		5/1/24	Resolution Agency Concurrence Point 2
City of Wisconsin Dells, Edward E. Wojnicz, Mayor, Sarah L. Brown, City Clerk Treasurer		7/27/23	Resolution recommending alternatives
Village of Lake Delton, John Webb, Village President, Tim McCumber, Administrator-Clerk-Treasurer		8/14/23	Resolution supporting the I-39/90/94 Corridor Study
City of Madison Office of the Mayor, Satya Rhodes-Conway, Mayor	WisDOT SW Region, Dan Schave and Colleen Harris	7/28/23	Preliminary Alternatives, staff comments and recommendations
City of Madison Transportation Commission		2/13/24	Resolution endorsing improvement of pedestrian and bicycle connectivity
City of Madison Department of Transportation, Thomas W. Lynch, Director of Transportation	WisDOT SW Region, David Schmidt	2/13/24	Agency Concurrence Points 1 and 2
WisDOT SW Region, David Schmidt	City of Madison Department of Transportation, Thomas W. Lynch	2/28/24	WisDOT Response on Agency Concurrence Points 1 and 2
City of Madison Department of Transportation, Thomas W. Lynch, Director of Transportation	WisDOT SW Region, David Schmidt	5/14/24	Agency Concurrence Point 2 Resolution
Sauk County Highway Department, Patrick Gavinski, Highway Commissioner	WisDOT SW Region, James Oettinger	2/14/24	County H Interchange

From	To	Date	Subject
Sun Prairie Committee of the Whole		3/19/24	Meeting Minutes documenting motion carried to support the DOT selection of Alternative 1 layout and added general purpose lane.
Capital Area Regional Planning Commission	WisDOT SW Region, David Schmidt	5/3/24	Agency Concurrence Point 2



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

12/16/2022

REPLY TO THE ATTENTION OF:

Mail Code R-19J

Bethaney Bacher-Gresock
Federal Highway Administration - Wisconsin Division
525 Junction Road, Suite 8000
Madison, Wisconsin 53717

**Re: EPA Cooperating Agency Invitation Request for the Proposed Interstate 39/90/94
Corridor Study, Dane and Columbia Counties, Wisconsin**

Dear Ms. Bacher-Gresock:

The U.S. Environmental Protection Agency (EPA) Region 5 received a letter from the Wisconsin Department of Transportation (WisDOT), dated December 12, 2022, inviting EPA to become a Cooperating Agency for the above-referenced project. This letter serves as EPA's acceptance of Cooperating Agency status, as defined in the Council of Environmental Quality regulations at 40 CFR Part 1501.6.

As a Cooperating Agency, to the extent that staff capacity and resources allow, EPA will (1) review draft documents in accordance with our authority under the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act (CAA), and (2) participate in meetings and site visits. EPA will not assist in preparing NEPA documents or other project materials. We request that the Federal Highway Administration (FHWA) and WisDOT provide at least two-weeks advanced notice of the times and dates of all meetings/conference calls and prior to submittal of documents for our review. We also request a 30-day window for EPA's review and comment on early coordination materials. Please provide electronic copies of all materials and refrain from sending paper copies. EPA retains its independent review and comment authority under Section 309 of the CAA. Additionally, EPA retains its right to review and comment during the U.S. Army Corps of Engineers' Clean Water Act Section 404 permitting process.

Thank you for inviting EPA to serve as a Cooperating Agency for this project. We welcome the opportunity to discuss the contents of this letter. You may contact Mike Sedlacek, lead reviewer for this project, at 312-886-1765 or sedlacek.michael@epa.gov.

Sincerely,

Kathy Triantafillou
Acting NEPA Section Supervisor
Tribal and Multi-media Programs Office
Office of the Regional Administrator

cc: Frank Pritzlaff, Wisconsin Department of Transportation, Southwest Region



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

August 16, 2023

VIA ELECTRONIC MAIL ONLY

Bethaney Bacher-Gresock
Environmental Manager
Federal Highway Administration
525 Junction Road
Madison, Wisconsin 53717

Dan Schave, P.E.
Project Supervisor
Wisconsin Department of Transportation
2101 Wright Street
Madison, Wisconsin 53704

RE: EIS Scoping: I-39/90/94 Improvements from US 12/18 (Beltline) in Madison to US 12/WIS 16 Interchange in Wisconsin Dells, Dane, Columbia, Sauk and Juneau Counties, Wisconsin

Dear Ms. Bacher-Gresock and Mr. Schave:

The U.S. Environmental Protection Agency (EPA) has reviewed the Federal Highway Administration's (FHWA) and Wisconsin Department of Transportation's (WisDOT) Notice of Intent – Additional Information dated July 2023, the I-90 Madison to Tomah Needs Study (Study) dated January 2022, and the Corridor Needs Report (Report) dated January 2022, for proposed improvements to 67 miles of Interstate 39/90/94 (I-39/90/94) in Dane, Columbia, Sauk, and Juneau Counties, Wisconsin. EPA's comments are provided in accordance with our responsibilities as a Cooperating Agency in the National Environmental Policy Act (NEPA) process (40 CFR Part 1501.8), our authorities under NEPA, the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

FHWA and WisDOT are planning to prepare an Environmental Impact Statement (EIS) to evaluate potential improvements to provide reliable and safe travel on I-39/90/94 between US Highway (US Highway) 12/18 in Madison and US 12/Wisconsin State Highway (WIS) 16 in Wisconsin Dells. The EIS will also evaluate I-39 from its split with I-90/94 (the I-39 I-90/94 Split) to Levee Road near Portage. The study corridor is 67 miles long. WisDOT's Report evaluated existing and future conditions (e.g., traffic, safety, pavement, and resiliency) along the I-39/90/94 corridor. The Report serves as the basis for development of the I-39/90/94 Corridor Study purpose and need and range of alternatives.

I-39/90/94 is a multi-lane interstate with 15 interchanges and more than 100 bridges, traveling through the urban/suburban Madison metropolitan area at the south end of the corridor, while the northern portion of the corridor is characterized by rural and natural resource land uses and the Wisconsin Dells. This corridor is part of Wisconsin's "backbone system," a network of highways connecting major population and economic regions of the state, and is relied on for its tourism accessibility, employment access, and freight mobility.

Based on our review of the Study and Report, we offer comments regarding: (1) alternatives, (2) environmental justice and community engagement, (3) children's health, (4) air quality, greenhouse gas emissions and climate change, (5) bridge demolition and construction noise, (6) historic, architectural, archaeological and cultural resources, (7) terrestrial resources, (8) Federally-listed species, (9) aquatic resources, (10) cumulative impacts analysis, and (11) agency consultation. Please find EPA's detailed comments enclosed. Our comments are intended to inform development of the forthcoming EIS.

Please send electronic copies of future NEPA documents pertaining to this project to R5NEPA@epa.gov. If you would like to discuss the contents of this letter further; please contact Kathy Kowal, lead reviewer for this project, at kowal.kathleen@epa.gov. Ms. Kowal is also available at 312-353-5206.

Sincerely,

**ELIZABETH
PELLOSO** Digitally signed by
ELIZABETH PELLOSO
Date: 2023.08.16
11:20:44 -05'00'

for

Krystle Z. McClain, P.E.
NEPA Program Supervisor
Tribal and Multimedia Programs Office

Enclosures: *EPA's Detailed Comments for I-39/90/94 from US 12/18 (Beltline) in Madison to
US 12/WIS 16 Interchange in Wisconsin Dells
Construction Emission Control Checklist*

ccs: Kyle Zibung, U.S Army Corps of Engineers
Sarah Quamme, U.S. Fish and Wildlife Service
Andrew Barta, Wisconsin Department of Natural Resources

EPA's Detailed Comments

I-39/90/94 from US 12/18 (Beltline) in Madison to US 12/WIS 16 Interchange in Wisconsin Dells, Dane, Columbia, Sauk and Juneau Counties, Wisconsin
August 16, 2023

Alternatives

Section 3 of the Study describes the alternatives under consideration, Section 4 summarizes the preliminary range of impacts from mainline and interchange alternatives, and Section 5 summarizes the screening matrix used to determine alternatives carried forward for continued study.

Recommendations for the Draft EIS: We recommend the Draft EIS address the following:

- provide clear explanation for elimination of any alternatives. EPA recommends augmenting elimination criteria to include impacts to residences and commercial properties;
- discuss how alternatives carried forward would address problems identified (e.g., traffic, geometric design of the roadway, pavement conditions, and resiliency) along the corridor, including any potential shortcomings;
- discuss the necessity of rebuilding the I-94/WIS 30 interchange and the US 151/High Crossing Boulevard interchange, which are approximately one mile apart. Explain how safety concerns will be addressed for two interchanges in close proximity as well as what land uses are served by the two interchanges, including cumulative impacts;
- explain how users will access US 51 if access is removed from North American Lane and Daentl Road. Discuss impacts (e.g., noise, air quality, etc.) from using alternative routes to access US 51;
- explain how proposed improvements to 60th Street (US 12/WIS 16 Alternative 1 – Diamond Interchange) will improve safety when compared to the current configuration which appears to provide better line-of-site with fewer natural resource impacts;
- discuss whether Transportation Demand Management (TDM) and Transportation System Management Operations (TSMO) will be retained as a hybrid to alternatives carried forward for consideration;
- discuss advantages and disadvantages of proposed changes (e.g., replacing traffic signals with free flow loop ramps) in terms of safety, congestion, air quality, etc.);
- discuss how each alternative would address expected level of service (LOS) through the project's proposed design year (2050). Provide a clear explanation of the comparisons between average and peak future and existing forecasts shown in the I-90 Madison to Tomah Needs Study (page 6);
- discuss how proposed alternatives address regional transit and rail investments identified in the Connect Greater Madison Regional Transportation Plan for 20501 (Plan). Discuss how measures identified in the Plan can be included in Build Alternatives;
- discuss how regional growth is factored into traffic forecasts and the alternatives. In particular, discuss reasonably-foreseeable projects (eg, residential/commercial/industrial development particularly in the southern half of the corridor near Madison) and the effect on traffic forecasts;
- discuss how the alternatives minimize residential/commercial relocation, to the extent practicable;
- explain impacts to traffic using the corridor during construction. Discuss whether traffic will be routed to other roadways, whether alternate route(s) can handle additional vehicles, expected LOS on alternative routes, and additional impacts (e.g., increased air and noise impacts); and

¹ <https://www.greatermadisonmpo.org/planning/documents/FullPlan-ConnectRTP-web.pdf>

- clearly explain all terms that may be unfamiliar to readers (e.g., collector-distributor lanes, modernization, etc.) and ensure all topics are explained in plain language.

Environmental Justice Impacts / Community Engagement

To promote environmental justice (EJ), Executive Order 12898: *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations* requires Federal agencies to identify and address disproportionately high and adverse impacts of all programs, policies, and activities on low income and/or minority populations. EPA encourages the use of EJSCREEN² as a useful first step in highlighting locations that may be candidates for further analysis. The tool can help identify potential community vulnerabilities by calculating EJ Indexes and displaying other environmental and socioeconomic information in color-coded maps and standard data reports (e.g., pollution sources, health disparities, critical service gaps, climate change data). EJSCREEN can also help focus environmental justice outreach efforts by identifying potential language barriers, meeting locations, tribal lands and indigenous areas, and lack of broadband access. For purposes of NEPA review, EPA considers a project to be in an area of potential EJ concern when the area shows one or more of the twelve EJ Indexes at or above the 80th percentile in the nation and/or state. However, scores under the 80th percentile should not be interpreted to mean there are definitively no EJ concerns present.

While EJSCREEN provides access to high-resolution environmental and demographic data, it does not provide information on every potential community vulnerability that may be relevant. The tool's standard data report should not be considered a substitute for conducting a full EJ analysis, and scoping efforts using the tool should be supplemented with additional data and local knowledge. Also, recognizing the inherent uncertainties with screening level data, and to help address instances when the presence of EJ populations may be diluted (e.g., in large project areas or in rural locations), EPA recommends assessing each block group within the project area individually and adding an appropriate buffer around the project area. Please see the EJSCREEN Technical Documentation³ for a discussion of these and other issues.

Recommendations for the Draft EIS: EPA acknowledges the mention of WisDOT's EJ Analysis and Plan (Plan), which inventories income and race information from the most recent U.S. Census data and the most recent American Community Survey. We recommend the Draft EIS address the following while noting the following information may be useful as FHWA/WisDOT determines impacts, mitigation, and outreach efforts:

- identify the presence of low-income and/or minority communities within the project areas that could experience impacts from the proposed project(s). Disclose demographic information. For initial screening, use EPA's EJSCREEN mapping tool. Use census-tract-level information to initially help locate communities with EJ concerns;
- describe past activities and future plans to engage low-income, minority, and non-English speaking populations, and the surrounding community in the environmental review and planning phase, and, if the project commences, during construction;
- evaluate the impacts (adverse and beneficial) of project proposals on low-income and/or minority communities and sensitive populations (e.g., children, people with asthma, elderly communities, etc.);

² <https://www.epa.gov/ejscreen>

³ <https://www.epa.gov/ejscreen/technical-information-about-ejscreen>

- compare project impacts on low-income and minority populations with an appropriate reference community to determine whether there may be disproportionate impacts (e.g., consider risk of exposure to hazardous/toxic materials associated with the project construction, and noise impacts)
- identify measures to: 1) ensure meaningful community engagement; 2) minimize adverse community impacts; and 3) avoid disproportionate impacts to communities with EJ concerns. The Draft EIS should describe how individuals and communities were provided a meaningful voice in the project's development. The Draft EIS should also clearly document how FHWA/WisDOT have ensured full, fair, and meaningful public participation;
- compare the demographics of residents in the project area with the expanded demographics of the individuals (e.g., highway users, business owners, etc.) who would benefit from the proposed project to assist in considering the potential for disproportionate impacts. Include demographic data for Dane, Columbia, Sauk and Juneau Counties as well as the State of Wisconsin.⁴
- In addition to considering air quality and noise impacts, consider the risk of exposure to hazardous/toxic materials associated with project construction and operation;
- incorporate and discuss the latest EJ resources⁵ to appropriately engage in meaningful, targeted, community outreach, analyze impacts, and advance environmental justice through NEPA implementation. Resources to aid agencies when conducting EJ analyses include:
 - the Federal Interagency Working Group on Environmental Justice's Promising Practices for EJ Methodologies in NEPA Reviews⁶; and
 - Executive Order 13985 requiring agencies to take a heightened focus on justice and equity issues⁷;
- describe future plans to engage minority/low-income populations, and the surrounding communities in the environmental review and planning phase, and, if the project commences, during construction. FHWA/WisDOT may find the Community Guide to EJ and NEPA Methods⁸ useful when designing methods to engage in meaningful, targeted, community outreach, analyze impacts, and advance environmental justice through NEPA implementation;
- discuss the cumulative impacts from climate change on public health for communities in the project area. Studies have shown that communities with EJ concerns may have less adaptive capacity and are thus more prone to disproportional impacts from climate change. See EPA's report "Analyses of the Effects of Global Change on Human Health and Welfare and Human Systems"⁹;
- include FHWA/WisDOT's analyses and conclusions regarding whether the Proposed Action may have disproportionately high and adverse impacts on low income or minority communities, as specified in CEQ's Environmental Justice Guidance;¹⁰
- describe measures that will be taken to avoid, minimize, or mitigate impacts any disproportionate impacts to communities with EJ concerns and impacts to other sensitive populations;
- use conclusions on the potential for disproportionate impacts to inform project decisions, including mitigation;

⁴ EPA is not suggesting additional data collection; we recommend use of available data.

⁵ EJ and NEPA resources available at <https://www.epa.gov/environmentaljustice/environmental-justice-and-national-environmental-policy-act>

⁶ The Promising Practices Report is a compilation of methodologies gleaned from current agency practices identified by the NEPA Committee concerning the interface of environmental justice considerations through NEPA processes. See <https://www.epa.gov/environmentaljustice/ej-iwg-promising-practices-ej-methodologies-nepa-reviews>

⁷ See E.O. 13985 on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government and E.O. 12898 on Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.

⁸ <https://www.energy.gov/nepa/articles/community-guide-environmental-justice-and-nepa-methods>

⁹ <http://cfpub.epa.gov/ncea/cfm/recordisplay.cfm?deid=197244>

¹⁰ CEQ's Environmental Justice Guidance Under the National Environmental Policy Act. See Section III, Part C-4.

https://www.epa.gov/sites/default/files/2015-02/documents/ej_guidance_nepa_ceq1297.pdf?VersionId=78iNGtdwSTz5E2x.H0aHq.E96_Tphbgd

- if unavoidable relocations will occur, discuss whether fair market value will be assessed at the highest point of value to protect owner wealth;
- clearly indicate benefits and impacts that would be realized by communities living in the project area (e.g., construction and operational air pollution and noise) while project benefits would be experienced by a larger population who live and work outside the project area but use the corridor; and
- identify locations for properly designed vegetative barriers within the project corridor. Public health concerns related to near-road air quality are an important environmental issue, given the established science linking adverse health effects to populations spending significant amounts of time near high-traffic roads¹¹. Research indicates that roadways generally influence air quality about 500-600 feet downwind, particularly roads with significant truck traffic. Properly designed vegetation barriers (i.e., strategically placed evergreen trees meeting specific depth and height specifications) can be used to reduce exposure to near-road air pollution, either alone or in combination with solid noise-reduction fences or barriers. In addition to air quality benefits, roadside vegetation can also improve aesthetics, increase property values, reduce heat, control surface water runoff, and reduce noise pollution. As such, EPA recommends FHWA/WisDOT evaluate whether locations where sensitive receptors live, work, and play (e.g., schools, childcare centers, hospitals, elder-care facilities), might especially benefit from a vegetated buffer. Additional considerations can be found in: *Recommendations for Constructing Roadside Vegetation Barriers to Improve Near-Road Air Quality*,¹² *Near Roadway Air Pollution and Health: Frequently Asked Questions*,¹³ and *Vegetation Barrier Toolkit for Schools and Communities*.¹⁴ Consider vegetated barriers in addition to the already-proposed noise walls. EPA is available to assist if necessary;
- use conclusions on the potential for disproportionate impacts to inform project decisions, including mitigation;
- if unavoidable relocations will occur, discuss whether fair market value will be assessed at the highest point of value to protect owner wealth; and
- clearly indicate benefits and impacts that would be realized by communities living in the project area (e.g., construction and operational air pollution and noise) while project benefits would be experienced by a larger population who live and work outside the project area but use the corridor.

Children's Health

Recommendations for the Draft EIS: We recommend the Draft EIS address the following:

- indicate how the proposed project incorporates Executive Order 13045: *Protection of Children From Environmental Health Risks and Safety Risks*, which directs each Federal agency to make it a high priority to identify and assess environmental health and safety risks that may disproportionately affect children and ensure that policies, programs, activities, and standards address these risks, and
- commit to a construction traffic management plan to ensure that trucks hauling materials and heavy machinery avoid areas where children congregate, when possible. Construction traffic should be routed away from schools, daycare facilities, and parks; crossing guards should be used

¹¹ Health Effects Institute, 2010. Traffic-related air pollution: a critical review of the literature on emissions, exposure, and health effects. HEI Special Report 17. Health Effects Institute, Boston, MA

¹² https://cfpub.epa.gov/si/si_public_file_download.cfm?p_download_id=528612

¹³ <https://www.epa.gov/air-research/near-roadway-air-pollution-and-health-frequent-questions>

¹⁴ <https://chicagorti.org/resources/vegetation-barrier-toolkit-for-schools-and-communities/> - EPA collaborated on this document, which takes EPA research and puts in a more user-friendly form. This document provides a step-by-step guide to developing vegetative barriers for air quality, including all stages of design, species selection, planting, maintenance, and community engagement.

when such areas cannot be avoided. In addition to air quality benefits, careful routing may protect children from vehicle-pedestrian accidents.

Air Quality and Mitigation

Recommendations for the Draft EIS: We recommend the Draft EIS address the following:

- discuss current air quality in Dane, Columbia, Sauk and Juneau Counties;
- identify and discuss construction and operation air quality impacts that could result from the proposed project. We recommend quantifying estimates of construction emissions and identifying sensitive receptors (residences, schools, etc.) that would be impacted;
- assess the use of vegetative barriers to reduce the movement of roadway air pollution into adjacent neighborhoods for build alternatives.¹⁵ EPA research has demonstrated that well-planned vegetative barriers can reduce exposure to roadway air pollution by up to 50 percent, and the combination of a solid fence with vegetation can result in the greatest protection while still following safety and line-of-sight requirements.¹⁶ EPA would appreciate the opportunity to discuss use of vegetation to reduce pollution exposures. Please contact Kathy Kowal to connect with EPA scientists specializing in vegetative barriers for air quality benefits;
- commit to applicable measures from the enclosed *Construction Emission Control Checklist* that would minimize exposure;
- per Executive Order 13045 on Children's Health,¹⁷ pay particular attention to worksite proximity to places where children live, learn, and play, such as homes, schools, and playgrounds. Construction emission reduction measures should be strictly implemented near these locations to be protective of children's health¹⁸; and
- require completion of a construction traffic management plan that ensures trucks hauling materials and heavy machinery avoid areas where children congregate within adjacent neighborhoods, when possible. Route construction truck traffic away from schools, daycare facilities, and parks, if applicable, and use crossing guards when such areas cannot be avoided. In addition to air quality benefits, careful routing may protect children from vehicle-pedestrian accidents.

Greenhouse Gas Reduction (GHG) and Climate Change

Recommendations for the Draft EIS: We recommend the Draft EIS address the following:

- fully quantify and disclose emissions from the proposed action. Consider the following when analyzing emissions:
 - Executive Order 14008: *Tackling the Climate Crisis at Home and Abroad* states, states "The United States and the world face a profound climate crisis. We have a narrow moment to pursue action...to avoid the most catastrophic impacts of that crisis and to seize the opportunity that tackling climate change presents.";

¹⁵ Vegetative barriers are strategically-sited trees and shrubs, with rows preferably 3 meters tall and 4 meters thick, without any gaps in foliage between trees, running parallel to the roadway. Use of coniferous tree species is critical because they keep their needles year-round.

¹⁶ Expressways generally influence air quality within 500-600 feet; it is therefore most important to assess sites for barriers where there are residences, schools, playgrounds, and other places people gather within 500-600 feet of a roadway. See EPA's Near Roadway Air Pollution and Health: Frequently Asked Questions https://www.epa.gov/sites/default/files/2015-11/documents/420f14044_0.pdf

¹⁷ <https://www.epa.gov/children/executive-order-13045-protection-children-environmental-health-risks-and-safety-risks>

¹⁸ Children may be more highly exposed to contaminants because they generally eat more food, drink more water, and have higher inhalation rates relative to their size. Also, children's normal activities, such as putting their hands in their mouths or playing on the ground, can result in higher exposures to contaminants as compared with adults. Children may be more vulnerable to the toxic effects of contaminants because their bodies and systems are not fully developed and their growing organs are more easily harmed.

- the U.S. Global Change Research Program’s National Climate Assessment provides data and scenarios that may be helpful in assessing trends in temperature, precipitation, and frequency and severity of storm events.¹⁹ The proposed project would release GHG emissions during construction from trucks hauling materials, workers’ vehicles and operation of construction equipment as well as during roadway use;
- federal courts have consistently held that NEPA requires agencies to disclose and consider climate impacts in their reviews, including impacts from GHG emissions. On January 9, 2023, the Council on Environmental Quality’s (CEQ) *National Environmental Policy Act Guidance on Consideration of Greenhouse Gas Emissions and Climate Change*²⁰ was published in the Federal Register. CEQ issued this interim guidance to assist Federal agencies in assessing and disclosing climate impacts during environmental reviews. The guidance responds to Executive Order 13990: *Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis*, which directed CEQ to review, revise, and update CEQ’s 2016 emissions guidance. The 2023 interim guidance is effective immediately and should be used to inform the reviews of new proposed actions. CEQ indicated that agencies should use this interim guidance to inform the NEPA review for all new proposed actions and may use it for evaluations in process, as agencies deem appropriate, such as informing the consideration of alternatives or helping address comments raised through the public comment process. The Draft EIS should clearly discuss how the interim guidance was applied, as appropriate, to ensure robust consideration of potential climate impacts, mitigation, and adaptation issues;
- estimate and disclose the social cost of greenhouse gases (SC-GHG) from the proposed action. Consider the following:
 - estimates of the social cost of greenhouse gases (SC-GHG²¹) are informative for assessing the impacts of GHG emissions. SC-GHG estimates monetize the societal value of changes in GHG emissions from actions that have small, or marginal, impacts on cumulative global emissions. Estimates of the social cost of carbon (SC-CO₂) and other greenhouse gases (e.g., social cost of methane (SC-CH₄)) have been used for over a decade in Federal government analyses. Quantification of anticipated GHG releases and associated SC-GHG comparisons among all alternatives (including the No Action Alternative) within the Draft EIS can inform project decision-making and provide support for implementing all practicable measures to minimize GHG emissions.

Emissions & SC-GHG Disclosure and Analysis

- quantify reasonably-foreseeable direct (e.g., construction) and indirect (e.g., off-site material hauling and disposal) GHG emissions;
- use SC-GHG estimates to consider the climate damages from net changes in direct and indirect emissions of CO₂ and other GHGs from the proposed project. To do so, EPA recommends a breakdown of estimated net GHG emission changes by individual gas, rather than relying on CO₂-equivalent (CO₂e) estimates, followed by monetizing the climate impacts associated with each GHG using the corresponding social cost estimate (i.e., monetize CH₄ emissions changes expected to occur with the social cost of methane (SC-CH₄) estimate for emissions).²² When applying SC-

¹⁹ Information on changing climate conditions is available through the National Climate Assessment at: <http://nca2018.globalchange.gov>
²⁰ <https://www.federalregister.gov/d/2023-00158>

²¹ EPA uses the general term, “social cost of greenhouse gases” (SC-GHG), where possible because analysis of GHGs other than CO₂ are also relevant when assessing the climate damages resulting from GHG emissions. The social cost of carbon (SC-CO₂), social cost of methane (SC-CH₄), and social cost of nitrous oxide (SC-N₂O) can collectively be referenced as the SC-GHG.

²² Transforming gases into CO₂e using Global Warming Potential (GWP) metrics, and then multiplying the CO₂e tons by the SC-CO₂, is not as accurate as a direct calculation of the social costs of non-CO₂ GHGs. This is because GHGs differ not just in their potential to absorb infrared radiation over a given time frame, but also in the temporal pathway of their impact on radiative forcing and in their impacts on physical endpoints other than temperature change, both of which are relevant for estimating their social cost but not reflected in the

GHG estimates, just as with tools to quantify emissions, disclose assumptions (e.g., discount rates) and uncertainties associated with such analysis and the need for updates over time to reflect evolving science and economics of climate impacts; and

- compare and disclose GHG emissions and SC-GHG across alternatives to inform decision-making.

Resilience and Adaptation

- large storm events are occurring with increasing frequency and intensity in the Midwest due to climate change. Describe changing climate conditions (i.e., temperatures and frequency and severity of storm events) and assess how such changes could impact the proposed project and the environmental impacts of the proposed project and alternatives. Consider increases in frequency and severity of storm events, flooding, and periods of high heat (e.g., more severe/frequent flooding). Discuss how stormwater infrastructure could be designed to help ensure public health and safety in addition to decreasing impacts to aquatic resources (e.g., capture and filtration of runoff). We strongly encourage committing to on-site green stormwater management via use of bioswales, permeable pavement, rain gardens, retention ponds, and/or over-sized culverts or bridges, as applicable, in the Draft EIS;
- consider climate-resilient solutions based on equity and inclusivity to reduce vulnerability for everyone. Consider solutions that boost resilience while improving livelihoods, accessibility, and social and economic well-being. Solutions could include adding green spaces in urban areas and investing in low-carbon transportation networks. Such solutions can also promote other local benefits by mitigating the effects of urban heat islands, reducing air pollution, and strengthening community interaction; and
- describe climate resilience and adaption considerations for 1) construction plans; 2) emergency planning; 3) stormwater management; and 4) maintenance and monitoring of the roadway.

Reduction and Mitigation

- identify practices to reduce and mitigate GHG emissions. Some chronic medical conditions can increase an individual's risk of illness and death when facing climate change-related impacts, particularly exposure to heat and poor air quality;
- consider ways to reduce heat island effects from increased pavement (e.g., increase tree canopy, include vegetated barriers to reduce air and noise impacts);
- analyze best available control strategies, while considering low-income and minority populations, and sensitive environmental and health receptors, such as children; and
- engage people with diverse backgrounds and experiences as well as non-English speakers to make effective use of the community's experience to expand on climate-related considerations that can inform NEPA decisions.

Bridge Demolition

Recommendations for the Draft EIS: We recommend the Draft EIS address the following:

- Commit to testing existing bridge infrastructure to determine if lead paint is present. If lead paint is verified, EPA recommends the use of contractors trained and certified to conduct lead-abatement activities and apply appropriate lead-safe work practices. Specific mitigation measures might include, but are not limited to:

GWP. See the Interagency Working Group on Social Cost of Greenhouse Gases' February 2021 *Technical Support Document: Social Cost of Carbon, Methane, and Nitrous Oxide Interim Estimates under Executive Order 13990* for more discussion and the range of annual SC-CO₂, SC-CH₄, and SC-N₂O estimates currently used in Federal benefit-costs analyses.

- bridge deconstruction in a way that does not drop debris into water bodies (e.g., Mirror Lake);
- containment, end-of-workday cleanup and proper storage of debris and waste;
- placement of barriers to prevent lead dust from leaving from the site;
- use of personal protective equipment by workers;
- protocols for entering and exiting the work area and the posting of warnings signs; and
- all other relevant or applicable federal environmental regulations should apply, including the Occupational and Safety Hazard Administration's lead in construction standards.

Construction Noise and Vibration

Recommendations for the Draft EIS: We recommend the Draft EIS address the following:

Noise and Vibration Impacts

- identify residences and other sensitive receptors that would potentially be impacted by construction noise and vibration. Include residences, cultural and religious gathering spots, schools, day care centers, senior housing, community centers, medical facilities, and offices, among others. Assess how the project would impact such receptors;
- assess whether low-income and minority residences could experience disproportionate noise and vibration impacts during construction, and if so, whether mitigation is justified. For mitigation, if any residences are particularly close to pile driving or other highly impactful activities during construction, consider whether the option for temporary housing may be warranted or limiting time windows when certain equipment can be used; and
- provide a plan for giving residents sufficient warning of noise and vibration-intensive activities.

Staging

- include exhibits showing the location of proposed staging areas;
- show locations of proposed access roads and associated impacts. We recommend the least amount of habitat disturbance (e.g., tree removal). A discussion concerning mitigation – voluntary or permitted – associated with access and staging should also be included;
- discuss the transport of necessary materials, anticipated number of transport vehicles traveling to the construction area each day, etc.;
- include best management practices typically employed to minimize construction impacts to air quality, water resources, soil (e.g., sediment and erosion control methods), and other regulated resources during this type of project; and
- include a spill management plan.

Construction Debris

- discuss the potential for reuse and/or recycling of existing pavement, which can preserve valuable landfill capacity;
- discuss the potential for replacing carbon-intensive Portland Cement in concrete; and
- consider practices applicable from EPA's Sustainable Management of Construction and Demolition Materials webpage²³ and Large-Scale Residential Demolition webpage.²⁴ Use these resources to help identify environmentally-sensitive activities associated with road construction and develop contract language for bid packages with specific technical requirements to improve environmental results.

²³ <https://www.epa.gov/smm/sustainable-management-construction-and-demolition-materials>

²⁴ <https://www.epa.gov/large-scale-residential-demolition>

General Mitigation Opportunities

Recommendations for the Draft EIS: We recommend the Draft EIS address the following:

- include a factsheet of all protective measures required for project construction (e.g., idling time limits, speed limits for construction trucks, and dust suppression). Include a telephone number residents can call if contractors are not following required practices and distribute the factsheet to the surrounding communities; and
- discuss how users will be informed of construction periods, paying special attention to tourists who use the corridor to visit the Wisconsin Dells during annual tourist seasons.

Historic, Architectural, Archaeological, and Cultural Resources

Recommendations for the Draft EIS: We recommend the Draft EIS address the following:

- discuss results of consultation with the State Historic Preservation Officer under Section 106 of the National Historic Preservation Act to determine if the project area and any proposed staging areas contain historical or archaeological resources, including properties that are listed on the National Register of Historic Properties or eligible for listing; and
- determine potential impacts, if any, to historic properties within the project area.

Terrestrial Habitat

Recommendations for the Draft EIS: We recommend the Draft EIS address the following:

- include exhibits showing natural habitats that would be temporarily or permanently disturbed as a result of each alternative;
- disclose estimated acreage of terrestrial impacts for each alternative; and
- consider voluntary tree mitigation on a one-to-one basis for native trees removed during construction. Consultation with the Wisconsin Department of Natural Resources (WDNR) or local park districts would likely provide options for tree planting.

Noxious and Non-Invasive Species (NNIS)

Recommendations for the Draft EIS: We recommend the Draft EIS address the following:

- discuss standard best management practices (e.g., washing construction equipment) that will be used to eliminate the spread of NNIS into, as well as out of, the project area; and
- address measures to control or eradicate existing populations of NNIS, ideally before earthmoving activities begin.

Federally-Listed Threatened and Endangered Species

Recommendations for the Draft EIS: We recommend the Draft EIS address the following:

- disclose the results obtained from using U.S. Fish and Wildlife Service's (USFWS) project planning tool (iPAC) to streamline the environmental review process.²⁵ Correspondence sent to and from the resource agencies regarding consultation efforts, and information on the status and results of those consultation efforts, should be included in the Draft EIS's appendices;

²⁵ <https://ecos.fws.gov/ipac/>

- discuss coordination in compliance with the Fish and Wildlife Coordination Act (Act);²⁶ and
- address potential affects to aquatic organisms from proposed alternatives and whether any seasonal restrictions are or will be required.

Wetlands, Waterways, and Aquatic Resources

Recommendations for the Draft EIS: We recommend the Draft EIS address the following:

Wetlands, Streams, and Floodplains

- provide a summary of regulated water resources within the project boundary and include the wetland delineation undertaken for the project;
- provide exhibits illustrating the location of nearby wetlands, streams, and floodplain, as applicable, for each alternative;
- discuss existing conditions and determine the extent of water resource impacts expected to occur to these resources for each alternative;
- describe both direct (e.g., permanent fill), indirect (e.g., changes in hydrology), and temporary (e.g., temporary construction impacts) impacts for each alternative;
- in addition to identifying aquatic resources and potential impacts, apply sequencing established by the Clean Water Act (CWA) Section 404(b)(1) Guidelines, namely, avoidance first, followed by demonstration of impact minimization, and mitigation for unavoidable impacts. The CWA Section 404 (b)(1) guidelines call for the Least Environmentally Damaging Practicable Alternative (LEDPA) to be selected to address impacts to wetlands, streams, and other waters of the United States. If applicable, the Draft EIS should include a discussion of proposed mitigation for unavoidable, minimized stream or aquatic impacts; and
- disclose and analyze potential permanent, temporary, direct, indirect and cumulative impacts to all aquatic resources.

Water Quality

- include information concerning water quality within the project area based on the WDNR's Clean Water Act Section 303(d) list of impaired waterbodies. For each waterbody listed on the 303(d) list, discuss what impairments are precluding the meeting of water quality standards and analyze how the proposed project could potentially affect the waterbody's listing (both positively and negatively);
- describe how proposed bridge designs to span Mirror Lake will minimize impacts to the waterbody (e.g., during construction, collecting and filtering stormwater); and
- disclose best practices for protecting water quality during project construction.

Stormwater

- include information on drainage design, including information on stormwater management, which may consist of stormwater basins for water quality treatment and rate control. Consider recent storm events (e.g., past 10-20 years) which may be greater than current regulatory requirements to account for changes in precipitation due to climate change;
- provide exhibits illustrating the potential locations of stormwater basins; and
- discuss whether scupper drains will be used to collect stormwater runoff from the bridges, and where such drainage will be directed.

²⁶ 16 U.S.C. §§661-666c; PL 85-624. The Act requires agencies consult with USFWS and state wildlife agencies concerning the conservation of wildlife resources where the water of any stream or other water body is proposed to be controlled or modified by a Federal agency or any public or private agency operating under a Federal permit.

Cumulative Impacts Analysis

Recommendations for the Draft EIS: We recommend the Draft EIS address the following:

- summarize corridor development;
- disclose and analyze potential direct, indirect, and cumulative impacts²⁷ to resources in the project areas, considering that highway development in the project area has a lengthy history;
- consider cumulative disproportionate environmental burdens faced by residents living near the project area when deciding on appropriate project mitigation measures, including accounting for and minimizing further displacement;
- consider the community's history of cumulative and disproportionate impacts. In particular, additional pavement and a changing climate with above-average hot days can increase ground ozone formation, exacerbating incidences of asthma for those with a history of exposure to air pollution; and
- consider reasonably-foreseeable impacts as a result of induced growth along or adjacent to the project area (e.g., at controlled access points, near the East Washington extension, along Hoepker and Portage Roads, etc.). Regional or county-wide smart growth or land use plans should inform the discussion of induced growth and cumulative impacts.

Agency Coordination

Recommendations for the Draft EIS: We recommend the Draft EIS address the following:

- the Report indicates WisDOT convened meetings of the Citizens Advisory Committee and Technical Advisory Committee in 2022. The Draft EIS should discuss how members were selected for each committee and whether members are representative of the corridor, particularly urban areas;
- the Report indicates WisDOT met with WDNR in 2022 to initiate early discussions focused on flooding events and sensitive environmental stewardship lands in the Pine Island Wildlife Area and with the U.S. Fish and Wildlife Service (USFWS) regarding the Baraboo River Waterfowl Production. We look to the Draft EIS to include comments from WDNR and USFWS regarding proposed alternatives, impacts, and proposed mitigation;
- summarize coordination with the U.S. Army Corps of Engineers regarding proposed alternative, impacts to aquatic resources, and proposed mitigation;
- summarize coordination with Indian tribes identified with environmental or cultural resources along the corridor; and
- include a list of all Federal, state, and local permits that will be required to undertake the preferred alternative. For all environmental impact categories requiring coordination with other Federal or state agencies, EPA recommends copies of both your letters to those agencies, as well as the responses from those agencies, be provided as appendices to the Draft EIS.

Additional Information

Recommendations for the Draft EIS: We recommend the Draft EIS address the following:

- include an explanation of all technical terms and utilize plain language; and

²⁷ Cumulative impacts are those that result from the proposed action's incremental impacts when these impacts are added to the impacts of other past, present, and reasonably-foreseeable future actions, including those under the control of other entities. This information could assist efforts to avoid, minimize, and mitigate adverse impacts, especially with communities with environmental justice concerns.

- demonstrate how FHWA/WisDOT have utilized the following databases to obtain environmental information related to the project area:
 - EnviroMapper²⁸: <https://www.epa.gov/waterdata/waters-watershed-assessment-tracking-environmental-results-system>
 - Envirofacts²⁹: <https://www3.epa.gov/enviro/facts/multisystem.html>
 - EJSCREEN: <https://www.epa.gov/ejscreen>
 - NEPAassist: <https://www.epa.gov/nepa/nepassist>
 - 303(3) Listed Impaired Waters: <https://www.epa.gov/exposure-assessment-models/303d-listed-impaired-waters>
 - National Ambient Air Quality Standards status: <http://www.epa.state.oh.us/dapc/general/naaqs.aspx>

²⁸ The Watershed Assessment, Tracking & Environmental Results System (WATERS) unites water quality information previously available only from several independent and unconnected databases.

²⁹ Includes enforcement and compliance information.

Construction Emission Control Checklist

Diesel emissions and fugitive dust from project construction may pose environmental and human health risks and should be minimized. In 2002, EPA classified diesel emissions as a likely human carcinogen, and in 2012 the International Agency for Research on Cancer concluded that diesel exhaust is carcinogenic to humans. Acute exposures can lead to other health problems, such as eye and nose irritation, headaches, nausea, asthma, and other respiratory system issues. Longer term exposure may worsen heart and lung disease.¹ We recommend FHWA/WisDOT consider the following protective measures and commit to applicable measures in the Draft EIS.

Mobile and Stationary Source Diesel Controls

Purchase or solicit bids that require the use of vehicles that are equipped with zero-emission technologies or the most advanced emission control systems available. Commit to the best available emissions control technologies for project equipment to meet the following standards.

- On-Highway Vehicles: On-highway vehicles should meet, or exceed, the EPA exhaust emissions standards for model year 2010 and newer heavy-duty, on-highway compression-ignition engines (e.g., long-haul trucks, refuse haulers, shuttle buses, etc.).²
- Non-road Vehicles and Equipment: Non-road vehicles and equipment should meet, or exceed, the EPA Tier 4 exhaust emissions standards for heavy-duty, non-road compression-ignition engines (e.g., construction equipment, non-road trucks, etc.).³
- Low Emission Equipment Exemptions: The equipment specifications outlined above should be met unless: 1) a piece of specialized equipment is not available for purchase or lease within the United States; or 2) the relevant project contractor has been awarded funds to retrofit existing equipment, or purchase/lease new equipment, but the funds are not yet available.

Consider requiring the following best practices through the construction contracting or oversight process:

- Establish and enforce a clear anti-idling policy for the construction site.
- Use onsite renewable electricity generation and/or grid-based electricity rather than diesel-powered generators or other equipment.
- Use electric starting aids such as block heaters with older vehicles to warm the engine.
- Regularly maintain diesel engines to keep exhaust emissions low. Follow the manufacturer's recommended maintenance schedule and procedures. Smoke color can signal the need for maintenance (e.g., blue/black smoke indicates that an engine requires servicing or tuning).
- Where possible, retrofit older-tier or Tier 0 nonroad engines with an exhaust filtration device before it enters the construction site to capture diesel particulate matter.
- Replace the engines of older vehicles and/or equipment with diesel- or alternatively-fueled engines certified to meet newer, more stringent emissions standards (e.g., plug-in hybrid-electric vehicles, battery-electric vehicles, fuel cell electric vehicles, advanced technology locomotives, etc.), or with zero emissions electric systems. Retire older vehicles, given the significant contribution of vehicle emissions to the poor air quality conditions. Implement programs to encourage the voluntary

¹ Carcinogenicity of diesel-engine and gasoline-engine exhausts and some nitroarenes. *The Lancet*. June 15, 2012

² <http://www.epa.gov/otaq/standards/heavy-duty/hdci-exhaust.htm>

³ <https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-nonroad-engines-and-vehicles>



REGION 5

CHICAGO, IL 60604

February 29, 2024

VIA ELECTRONIC MAIL ONLY

Lisa Hemesath
Environmental Protection Specialist
Federal Highway Administration, Wisconsin Division
525 Junction Road
Madison, Wisconsin 53717

David Schmidt, Project Manager
Wisconsin Department of Transportation
Southwest Region Madison Office
PDS Dane 2 Unit
2101 Wright Street
Madison, Wisconsin 53704

Re: Concurrence Point 1: I-39/90/94 Corridor Study, Dane, Columbia, Sauk, and Juneau Counties, Wisconsin

Dear Ms. Hemesath and Mr. Schmidt:

The U.S. Environmental Protection Agency (EPA) received Federal Highway Administration's (FHWA) January 12, 2024, concurrence request concerning the Alternatives to be Carried Forward for Detailed Study in the National Environmental Policy Act (NEPA) document for the aforementioned project. This letter provides EPA's response pursuant to our authorities under NEPA, the Council on Environmental Quality's (CEQ) NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

FHWA and the Wisconsin Department of Transportation (WisDOT) are considering potential reliability and safety improvements on Interstate 39/90/94 (I-39/90/94) between United States (US) Highway 12/18 in Madison and US 12/Wisconsin State Highway 16 in Wisconsin Dells. The study is also considering improvements along I-39 from its split with I-90/94 to Levee Road near Portage.

The study corridor is 67 miles long and consists of multi-lane interstate with 15 interchanges and over 100 bridges. The corridor passes through the largely urban/suburban Madison metropolitan area on the south end of the corridor, whereas the northern portion of the corridor is characterized by rural and natural resource land uses including the Wisconsin Dells.

In 2014, FHWA and WisDOT began two EIS studies for the corridor: Madison to Portage and Wisconsin Dells to Portage. In 2015, FHWA converted both projects to Tier 1 EISs due to project complexity and funding limitations. The Tier 1 EISs would have identified individual projects that could be

implemented with project-specific tiered environmental documents based on need and funding availability. FHWA and WisDOT canceled both Tier 1 EISs in Spring 2017 “due to recent and on-going reprioritization of major transportation projects.” Subsequently, WisDOT published a Corridor Needs Report in January 2022, which evaluated existing and future conditions along the I-39/90/94 corridor to be addressed in the current corridor study. This evaluation included traffic, safety, pavement and structure analyses. The Corridor Needs Report served as the basis for development of the I-39/90/94 study Purpose and Need document and the preliminary range of alternatives.

EPA reviewed the following documents when evaluating FHWA and WisDOT’s requests for NEPA concurrence points:

- Technical Memorandum—Alternatives Screening Analysis (January 2024);
- Technical Memorandum—Draft Impact Analysis Methodology Report (January 2023); and
- Coordination Plan for Agency and Public Involvement (January 2024).

These documents provided a summary of the range of alternatives considered, the screening processes, identified alternatives recommended for further study in a future Draft Environmental Impact Statement (Draft EIS), and a summary of preliminary environmental impacts for the alternatives to be carried forward for detailed analysis in the Draft EIS.

The Technical Memorandum—Alternatives Screening Analysis document identified the following alternatives to be carried forward for further analysis in a future Draft EIS:

Mainline or Interchange	Alternative
I-39/90/94 Freeway	Modernization Plus Added General-Purpose Lane
	Modernization Hybrid
I-94/WIS 30 Interchange	Full Modernization #2
Proposed New Milwaukee Street Interchange	Partial Cloverleaf
USH 151/High Crossing Boulevard	Directional
Proposed New Hoepker Road Interchange	Shifted Diamond
US 51 Interchange	Partial Cloverleaf
WIS 19 Interchange	U-Ramp
County V Interchange	<i>No Build; interchange constructed by others as a separate project</i>
County CS Interchange	Diamond
I-39 I-90/94 Split Interchange	Low Build
WIS 33 at I-39 Interchange	Diamond
WIS 33 at I-90/94 Interchange	Partial Cloverleaf
US 12 Interchange	Diverging Diamond
WIS 23 Interchange	Diamond
WIS 13 Interchange	Split Diamond
	Trumpet
US 12/WIS 16 Interchange	Diamond

EPA concurs with the alternatives recommended for further study under NEPA. Due to the potential impacts proposed to aquatic resources under the identified alternatives, the project will require an individual Clean Water Act Section 404 permit. EPA wishes to emphasize that as the project design evolves, we expect further avoidance and minimization of proposed impacts as part of a comprehensive alternatives analysis consistent with the Clean Water Act 404(b)(1) Guidelines. In order to carry out a sufficient alternatives analysis under the Clean Water Act Section 404, a field delineation of aquatic resources will be necessary to adequately evaluate aquatic resource impacts within all alternative project corridors.

We look forward to continued coordination regarding the proposed project. Please send an electronic copy of future NEPA documents to R5NEPA@epa.gov. If you would like to discuss the contents of this letter further, please contact Kathy Kowal, lead reviewer for this project, at kowal.kathleen@epa.gov. Ms. Kowal is also available at 312-353-5206.

Sincerely,

**KRYSTLE
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Krystle Z. McClain, P.E.
NEPA Program Supervisor
Environmental Justice, Community Health, and
Environmental Review Division

Cc: Bethaney Bacher-Gresock, FHWA



REGION 5
CHICAGO, IL 60604

April 30, 2024

VIA ELECTRONIC MAIL ONLY

Lisa Hemesath
Environmental Protection Specialist
Federal Highway Administration, Wisconsin Division
525 Junction Road
Madison, Wisconsin 53717

David Schmidt, Project Manager
Wisconsin Department of Transportation
Southwest Region Madison Office
2101 Wright Street
Madison, Wisconsin 53704

Re: Concurrence Point 2: I-39/90/94 Corridor Study, Dane, Columbia, Sauk, and Juneau Counties, Wisconsin

Dear Ms. Hemesath and Mr. Schmidt:

The U.S. Environmental Protection Agency (EPA) received Federal Highway Administration's (FHWA) April 1, 2024, concurrence request concerning the recommended preferred alternative to be carried forward for detailed study in the National Environmental Policy Act (NEPA) document for the aforementioned project. This letter provides EPA's response pursuant to our authorities under NEPA, the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

FHWA and the Wisconsin Department of Transportation (WisDOT) are considering potential reliability and safety improvements on Interstate 39/90/94 (I-39/90/94) between United States (US) Highway 12/18 in Madison and US 12/Wisconsin State Highway 16 in Wisconsin Dells¹. Improvements along I-39 from its split with I-90/94 to Levee Road near Portage are also being considered as part of this study.

EPA reviewed the following documents when evaluating FHWA and WisDOT's request for concurrence regarding the recommended preferred alternative:

- Preferred Alternatives Memorandum (April 2024); and
- Coordination Plan for Agency and Public Involvement (April 2024).

¹ The study corridor is 67 miles long and consists of multi-lane interstate with 15 interchanges and over 100 bridges. The corridor passes through the largely urban/suburban Madison metropolitan area on the south end of the corridor, whereas the northern portion of the corridor is characterized by rural and natural resource land uses including the Wisconsin Dells.

These documents provided a summary of a flood minimization study to reduce flood risk where I-39 and I-90/94 travel through the Wisconsin and Baraboo River floodplains as well as the recommended preferred alternative developed using the Alternatives Screening Analysis (January 2024),

The Preferred Alternatives Memorandum identified the following recommended preferred alternative to be carried forward for further analysis in a future Draft EIS:

Mainline or Interchange	Alternative
I-39/90/94 Freeway	Modernization Plus Added General-Purpose Lane
I-94/WIS 30 Interchange	Full Modernization #2
Proposed New Milwaukee Street Interchange	Partial Cloverleaf
USH 151/High Crossing Boulevard	Directional
Proposed New Hoepker Road Interchange	Shifted Diamond
US 51 Interchange	Partial Cloverleaf
WIS 19 Interchange	U-Ramp
County V Interchange	<i>No Build; interchange constructed by others as a separate project</i>
County CS Interchange	Diamond
I-39 I-90/94 Split Interchange	Low Build
WIS 33 at I-39 Interchange	Diamond
WIS 33 at I-90/94 Interchange	Partial Cloverleaf
US 12 Interchange	Diverging Diamond
WIS 23 Interchange	Diamond
WIS 13 Interchange	Trumpet
US 12/WIS 16 Interchange	Diamond

On April 24, 2024, FHWA and Wisconsin Department of Transportation (WisDOT) hosted a field visit attended by members of EPA’s review team along with representatives from the Wisconsin Department of Natural Resources. As a result of visiting select locations along the corridor, discussing the proposed project with attendees, and reviewing the above-mentioned documents, EPA concurs with the recommended preferred alternative.

As a result of the April 24th field visit, EPA offers the following to aid in the development of the Draft EIS:

New Interchanges at Milwaukee Street and Hoepker Road

EPA recommends information pertaining to municipalities’ requests for interchanges at these locations as well as reasonably-foreseeable development (indirect impact) should be included in the Draft EIS.

Rebuilding Interchanges at US 51, WIS 33, WIS 23, WIS 13, and US 12/WIS 16

EPA recommends including a robust explanation regarding why these interchanges are recommended to be re-built without substantial deviation from the existing footprint (e.g., to correct line-of-sight problems, new design standards, etc.) should be included in the Draft EIS.

County Road V

Recognizing proposed changes at this location will likely be privately-funded, EPA recommends analysis of impacts along the corridor include this reasonably-foreseeable project. At a minimum, this project should be included in the cumulative impacts analysis in the Draft EIS.

Aquatic Impacts

EPA recommends a robust discussion covering minimization of impact (e.g., working in the median from Pine Island to the Dells, etc.) and proposed mitigation for wetlands and stream impacts should be included in the Draft EIS.

Due to the potential impacts proposed to aquatic resources under the identified alternatives, the project will require an individual Clean Water Act Section 404 permit. EPA wishes to emphasize that as the project design evolves, we expect further avoidance and minimization of proposed impacts as part of a comprehensive alternatives analysis consistent with the Clean Water Act 404(b)(1) Guidelines. In order to carry out a sufficient alternatives analysis under the Clean Water Act Section 404, a field delineation of aquatic resources will be necessary to adequately evaluate aquatic resource impacts within all alternative project corridors.

We look forward to continued coordination regarding the proposed project. Please send an electronic copy of future NEPA documents to R5NEPA@epa.gov. If you would like to discuss the contents of this letter further, please contact Kathy Kowal, lead reviewer for this project, at kowal.kathleen@epa.gov. Ms. Kowal is also available at 312-353-5206.

Sincerely,

**KRYSTLE
MCCLAIN**

Krystle Z. McClain, P.E.
NEPA Program Supervisor
Environmental Justice, Community Health, and
Environmental Review Division

 Digitally signed by KRYSTLE
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Cc: Bethaney Bacher-Gresock, FHWA

From: [Bacher-Gresock, Bethaney \(FHWA\)](#)
To: [Caron Kloser](#); [Joel Brown](#)
Subject: FW: Invitation to become Participating Agency on FHWA - WisDOT I-39/90/94 Corridor Study
Date: Friday, December 9, 2022 2:25:28 PM
Attachments: [2022-12-09 FHWA Participating Agency Invite.pdf](#)

Bethaney Bacher-Gresock | (p)608-662-2119

From: Bacher-Gresock, Bethaney (FHWA) <Bethaney.Bacher-Gresock@dot.gov>

Sent: Friday, December 9, 2022 11:34 AM

To: MikeW@badriver-nsn.gov; thpo@badriver-nsn.gov; ned.danielsjr@fcpotawatomi-nsn.gov; benjamin.rhodd@fcp-nsn.gov; Kevindupuis@fdlrez.com; JillHoppe@fdlrez.com; marlon.whiteeagle@ho-chunk.com; bill.quackenbush@ho-chunk.com; pahhaitty@iowanation.org; karinda.eden@bia.gov; louis.taylor@lco-nsn.gov; brian.bisonette@lco-nsn.gov; bbisonette@lco-nsn.gov; jjohnsonsr@ldftribe.com; ldftthpo@ldftribe.com; jim.williams@lvd-nsn.gov; alina.shively@lvd-nsn.gov; Chairman@mitw.org; dgrignon@mitw.org; thill7@oneidanation.org; Oneida_THPO@oneidanation.org; josephrupnick@pbpnation.org; sduryea@pbpnation.org; hattiemitchell@pbnation.org; jody.johnson@piic.org; noah.white@piic.org; chris.boyd@redcliff-nsn.gov; marvin.defoe@redcliff-nsn.gov; edwina.buffalo-reyes@redcliff-nsn.gov; tiauna.carnes@sacandfoxks.com; gary.bahr@sacandfoxks.com; chief@sacandfoxnation-nsn.gov; chris.boyd@sacandfoxnation-nsn.gov; adminast.council@meskwaki-nsn.gov; director.historic@meskwaki-nsn.gov; robert.vanzile@scc-nsn.gov; michael.laronge@scc-nsn.gov; shannon.holsey@mohican-nsn.gov; thpo@mohican-nsn.gov; williamr@stcroixojibwe-nsn.gov; wandam@stcroixojibwe-nsn.gov; thpo@stcroixtribalcenter.com

Cc: Bacher-Gresock, Bethaney (FHWA) <Bethaney.Bacher-Gresock@dot.gov>; Helmrick, Michael - DOT <Michael.Helmrick@dot.wi.gov>; Pritzlaff, Frank J - DOT <Frank.Pritzlaff@dot.wi.gov>; Taylor, Brian F - DOT <BrianF.Taylor@dot.wi.gov>

Subject: Invitation to become Participating Agency on FHWA - WisDOT I-39/90/94 Corridor Study
Dear Tribal Chairs (and copy to THPOs):

The purpose of this email and attached letter is to:

1. **Invite your Tribe to become a Participating Agency and provide you with information on a transportation project that the Federal Highway Administration (FHWA) and Wisconsin Department of Transportation (WisDOT) are undertaking on the I-39/90/94 corridor in Dane, Columbia, Sauk, and Juneau counties, Wisconsin. Please respond by January 9, 2023.**

Your acceptance as a Participating Agency does not imply that your Tribe supports any proposed improvements, only that you are open to providing us with input on the project.

This invitation is separate and distinct from the Section 106 of the National Historic Preservation Act (Section 106) consultation process. WisDOT sent a letter to the Tribal Historic Preservation Officer (THPO), or designated cultural resources contact, as part of the Section 106 process on June 20, 2022. Should your Tribe wish, FHWA will initiate formal Tribal consultation.

2. **Invite you to attend an agency coordination meeting on January 30, 2023 from 10:30 AM CST – 12:00 PM CST.** The meeting link is provided within this email and will also be forwarded to you as a separate email appointment.

Subject: I-39 Agency Coordination Meeting

When: Monday, January 30, 2023 10:30 AM-12:00 PM (UTC-06:00) Central Time (US & Canada).

Microsoft Teams meeting

Join on your computer, mobile app or room device

[Click here to join the meeting](#)

Meeting ID: 290 406 308 729

Passcode: 5xGd2j

[Download Teams](#) | [Join on the web](#)

Or call in (audio only)

[+1 608-571-2209,,952869317#](#) United States, Madison

Phone Conference ID: 952 869 317#

[Find a local number](#) | [Reset PIN](#)

Bethaney Bacher-Gresock

Environmental Manager & FOIA Liaison

FHWA - Wisconsin Division Office

City Center West

525 Junction Road, Suite 8000

Madison WI 53717

(p)608-662-2119

From: Schmidt, David - DOT (DTSD) <David2.Schmidt@dot.wi.gov>
Sent: Friday, February 9, 2024 12:57 PM
To: Rhodd, Benjamin
Cc: Kobryn, Jennifer - DOT; Nicholas Bennett; Helmrick, Michael - DOT; Taylor, Brian F - DOT; Cloud, Lynn - DOT; Kaliszewski, Katherine N - DOT; Joel Brown; Coughlin, Amy - DOT; Rumschlag, Samuel J - DOT; Caron Kloser
Subject: RE: I-39/90/94 Corridor Study Coordination Point 1

External Email: Use caution when clicking on links, replying, or opening attachments.

Hello Mr. Rhodd,

Thank for your interest in the I-39/90/94 Corridor Study! I have reviewed your questions with the study team and our responses are below in [blue text](#).

- Will there be additional lands acquired to fulfill the highway designs as presented? And if so, to what degree or amount of land will need to be purchased to accommodate for design requirements?
 - [Yes, the build alternatives would require some additional right-of-way. The alternatives screening report shared with agencies has some information about anticipated additional right-of-way associated with the various alternatives. The information is preliminary as design is ongoing. The DRAFT EIS will include a discussion of additional right of way needs.](#)
- Are multi-acre lay-down, equipment, and/or supply yards being established (off ROW) for use during this endeavor? And thirdly, if aggregate is needed for phases of this effort, where will the aggregate be coming from? And finally, have those aggregate pits been surveyed for cultural resources as an extenuating component of this project?
 - [It is too early in the study process to define lay-down areas and aggregate needs. That information will become available as the project proceeds into final design. Aggregate borrows and waste sites are determined by the contractor and approved by the department. Part of the approval process for a borrow site is a cultural resources review. Non-commercial waste sites will also have a cultural resource review if the contractor proposes using one for the project.](#)
- [Regarding cultural resources, WisDOT will continue to coordinate through the section 106 process with all 106 stakeholders. Additionally, in the event of any inadvertent discoveries, WisDOT will follow all the appropriate historic preservation laws and regulations, i.e., State Statue 157.70, Section 106, 36CFR800 and the Section 106 Delegation PA.](#)

Last week we held our 3rd public involvement meetings (PIM) for the I-39/90/94 Corridor Study. We encourage you to visit our website at <https://tinyurl.com/I399094Study> to provide additional comments, view materials from last week's Public Involvement Meetings (PIM) and subscribe for future updates.

Thank you for your questions and please reach out to me should you have additional questions or concerns.

Sincerely,

David Schmidt, P.E. | Project Manager

Wisconsin Department of Transportation (DTSD)
Southwest Region Madison Office
PDS Dane 2 Unit
Phone: 608-246-3867
Cell: 608-516-9041
David2.Schmidt@dot.wi.gov



Schedule:

Monday – Thursday: 7:30 am to 5:00 pm
Friday: 7:30 am to 11:30 am
Tuesdays and Wednesday in the Office

From: Benjamin Rhodd <Benjamin.Rhodd@fcpsnsn.gov>
Sent: Wednesday, January 17, 2024 1:40 PM
To: Schmidt, David - DOT (DTSD) <David2.Schmidt@dot.wi.gov>
Subject: RE: I-39/90/94 Corridor Study Coordination Point 1

**CAUTION: This email originated from outside the organization.
Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Mr. Schmidt,

Pursuant to consultation under Section 106 of the National Historic Preservation Act (1966 as amended) the Forest County Potawatomi Community (FCPC), a Federally Recognized Native American Tribe, reserves the right to comment on Federal undertakings, as defined under the act inclusive of licensing, permitting or use of federal funds by a delegated agency.

Thank you for the information concerning the development of an EIS. While I took some time to look at the alternatives presented and the descriptions contained herein, as with many THPO's I am sure, is a query that would alleviate much of our concerns. The query is: will there be additional lands acquired to fulfill the highway designs as presented? And if so, to what degree or amount of land will need to be purchased to accommodate for design requirements? Secondly, are multi-acre lay-down, equipment, and/or supply yards being established (off ROW) for use during this endeavor? And thirdly, if aggregate is needed for phases of this effort, where will the aggregate be coming from? And finally, have those aggregate pits been surveyed for cultural resources as an extenuating component of this project?

The FCPC HPO requests to remain as a consulting party to this project.

As a standard caveat sent with each proposed project reviewed by the FCPC THPO, the following applies. In the event an Inadvertent Discovery (ID) occurs at any phase of a project or undertaking as defined, and human

remains or archaeologically significant materials are exposed as a result of project activities, work should cease immediately. The Tribe(s) must be included with the SHPO in any consultation regarding treatment and disposition of an ID find.

Thank you for protecting cultural and historic properties and if you have any questions or concerns, please contact me at the email or number listed below.

Respectfully,

Ben Rhodd, MS, RPA, Tribal Historic Preservation Officer
Forest County Potawatomi
Historic Preservation Office
8130 Mish ko Swen Drive, P.O. Box 340, Crandon, Wisconsin 54520
P: 715-478-7354 C: 715-889-0202 Main: 715-478-7474
Email: Benjamin.Rhodd@fcp-nsn.gov
www.fcpotawatomi.com

From: Schmidt, David - DOT (DTSD) <David2.Schmidt@dot.wi.gov>
Sent: Friday, January 12, 2024 10:03 AM
Cc: Caron Kloser <CKloser@HNTB.com>; Bennett, Nicholas <nbennett@hntb.com>; Kobryn, Jennifer - DOT <jennifer.kobryn@dot.wi.gov>; Helmrick, Michael - DOT <Michael.Helmrick@dot.wi.gov>; Taylor, Brian F - DOT <BrianF.Taylor@dot.wi.gov>; Schmidt, David - DOT (DTSD) <David2.Schmidt@dot.wi.gov>; Colleen Harris <Colleen.Harris@exp.com>; Justin M. Arndt, PE <jarndt@kapurinc.com>; Webb, Charlie/MKE <Charlie.Webb@jacobs.com>; Andreas, Brian <Brian.Andreas@strand.com>; Jeff Held <Jeff.Held@strand.com>; Joel Brown <joelbrown@hntb.com>; James Robinette <jrobinette@hntb.com>; DOT SWR Interstate Study <DOTSWRInterstateStudy@dot.wi.gov>
Subject: I-39/90/94 Corridor Study Coordination Point 1

Hello,

As Cooperating and Participating agencies, I am inviting you to our first formal Concurrence Point for the I-39/90/94 Corridor Study. In our prior communications with you in April 2022, we shared the study's Purpose and Need Summary, a Range of Alternatives summary, Draft Coordination Plan and Impact Analysis Methodology. At that time, we shared our expected combined concurrence point for both Purpose and Need and the Range of Alternatives after FHWA published the Notice of Intent given our prior informal coordination meetings.

On July 18, 2023, FHWA published the Notice of Intent to prepare an Environmental Impact Statement. This announcement formally began the process to prepare an EIS. I am submitting materials for formal review and concurrence in accordance with 23 United States Code (U.S.C.) 139. You can use this link [documents](#) to review the following:

- Purpose and Need Summary (previously reviewed March 2023)
- Coordination Plan (previously reviewed March 2023 – includes updated EIS and review schedules)
- Impact Analysis Methodology (previously reviewed March 2023)
- Alternatives Screening Analysis (new – update of Range of Alternatives Summary previously reviewed March 2023). The Alternatives Screening Analysis describes the range of alternatives considered and those alternatives WisDOT will further evaluate in the EIS.

Also as part of your review, I request your concurrence on the schedule as presented in the Coordination Plan. You will note the schedule shows Concurrence Point #2 for the Preferred Alternative beginning April 1, 2024 and concluding May 1, 2024.

You are also invited to an online Agency Coordination meeting on January 31, 2024 at time 10-11:30 a.m. We will review the alternatives advanced for further study in the EIS and discuss any preliminary comments or questions you may have. Please use the Teams link below to join the meeting.

I kindly request your concurrence by February 14, 2023.

Sincerely,

David Schmidt, P.E. | Project Manager

Wisconsin Department of Transportation (DTSD)

Southwest Region Madison Office

PDS Dane 2 Unit

Phone: 608-246-3867

Cell: 608-516-9041

David2.Schmidt@dot.wi.gov



Schedule:

Monday – Thursday: 7:30 am to 5:00 pm

Friday: 7:30 am to 11:30 am

Tuesdays and Wednesday in the Office

Microsoft Teams meeting

Join on your computer, mobile app or room device

Click here to join the meeting

Meeting ID: 231 748 892 585

Passcode: DMW5Mi

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+1 608-571-2209,,990428553# United States, Madison

Phone Conference ID: 990 428 553#

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United States Department of the Interior

NATIONAL PARK SERVICE

Ice Age National Scenic Trail
8075 Old Sauk Pass Road
Cross Plains, Wisconsin 53528



1.A.2(IATR)

August 10, 2023

Bethaney Bacher-Gresock, Environmental Manager, FHWA
525 Junction Road, Suite 8000
Madison, WI 53717; email: bethaney.bacher-gresock@dot.gov; 608-662-2119.

RE: NOI for EIS on I-39/90/94 in Dane, Columbia, Sauk, and Juneau counties, WI

Dear Ms. Bacher-Gresock

The National Park Service (NPS) Ice Age National Scenic Trail (NST) appreciates the opportunity to comment on the recently issued Notice of Intent (NOI) that an environmental impact statement (EIS) will be prepared to study potential improvements to 67 miles of Interstates 39, 90, and 94 (I-39/90/94) in Dane, Columbia, Sauk, and Juneau counties, Wisconsin. The Ice Age National Scenic Trail (Ice Age NST) traverses the proposed project study area (I-39/90/94 corridor) at several locations. This project may directly impact the Ice Age National Scenic Trail (NST) which is administered by the National Park Service (NPS) in partnership with the Wisconsin Department of Natural Resources (DNR), Ice Age Trail Alliance, and other partners along its 1200-mile length.

The specific road crossings of the Ice Age NST from South to North in the proposed project area are as follows: Sauk County on I-90/94 where Schepp Rd crosses under the Highway. This is the first location on the Eastern Bifurcation of the Ice Age NST in the project area where Trail hikers cross; Columbia County on I-39 where Levee Rd crosses under the Highway. This is the second location on the Eastern Bifurcation of the Ice Age NST in the project area where Trail hikers cross; Sauk County on I-90/94 where County Road H and Old US 12 crosses under the Highway. This is the first location on the Western Bifurcation of the Ice Age NST in the project area where Trail hikers cross; Juneau County on I-90/94 where the Ice Age NST connector along US 12/16 and 60th St align along the Highway. This is the second location on the Western Bifurcation of the Ice Age NST in the project area where Trail hikers pass in or near the project area. In summary, four potential locations in, or adjacent to, the proposed project area are included for evaluation.

The I-39/90/94 EIS will evaluate the potential social, economic, and environmental impacts/effects resulting from the implementation of the Build and No Build alternatives. FHWA and WisDOT will seek input from the public and agencies during the EIS development process regarding the effects of the project. The Ice Age NST would request the following be considered during the planning and implementation of the project. Determine if or to what extent the project will affect the three trail crossings and one adjacent section of trail at Highway 12/16. Where the Ice Age NST is in the project area, determine if 4f and or 6f consultation would be required. With regards to the trail and trail crossings in the I-39/90/94 project, maintaining safe access for hikers of the Ice Age NST during all phases of the project would be paramount. If this is not feasible at the current locations, then determine a reasonable temporary trail re-route working with Ice Age NST personnel to establish. It is the overall goal of the Ice Age NST during the project, to maintain safe and consistent trail access for hikers at each trail crossing location in the project area.



We appreciate the opportunity to provide these comments. Please contact us at 608-798-8700 or eric_gabriel@nps.gov if you have any questions.

Sincerely,

ERIC GABRIEL Digitally signed by ERIC GABRIEL
Date: 2023.08.10 08:53:40 -05'00'

Eric Gabriel, Superintendent, Ice Age National Scenic Trail

cc:

Dan Schave, PE, Project Supervisor, WIDOT

daniel.schave@dot.wi.gov

Kevin Thusius, Ice Age Trail Alliance

kevin@iceagetrail.org

Andrew Hanson III, Wisconsin Department of Natural Resources

andrew.hanson@wisconsin.gov

From: Gabriel, Eric J <Eric_Gabriel@nps.gov>

Sent: Wednesday, May 15, 2024 3:33 PM

To: Schmidt, David - DOT (DTSD) <David2.Schmidt@dot.wi.gov>

Subject: Re: [EXTERNAL] I-39/90/94 Concurrence Point #2

CAUTION: This email originated from outside the organization.

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David, I reviewed the documents in the link below. I appreciate the opportunity to remain involved as you work through your planning process.

Thank you,

Eric Gabriel

Superintendent

Ice Age National Scenic Trail

8075 Old Sauk Pass Road

Cross Plains, WI 53528

Office: 608-798-8690 Mobile: 360-854-8316

From: Schmidt, David - DOT (DTSD) <David2.Schmidt@dot.wi.gov>

Sent: Monday, April 1, 2024 1:24 PM

Cc: Schmidt, David - DOT (DTSD) <David2.Schmidt@dot.wi.gov>; Kobryn, Jennifer - DOT <jennifer.kobryn@dot.wi.gov>; Helmrick, Michael - DOT <Michael.Helmrick@dot.wi.gov>; Taylor, Brian F - DOT <BrianF.Taylor@dot.wi.gov>; Cloud, Lynn - DOT <Lynn.Cloud@dot.wi.gov>; Kaliszewski, Katherine N - DOT <katherinen.kaliszewski@dot.wi.gov>; Justin M. Arndt, PE <jarndt@kapurinc.com>; Charlie.Webb@jacobs.com <Charlie.Webb@jacobs.com>; Brian.Andreas@strand.com <Brian.Andreas@strand.com>; jeff.held <jeff.held@strand.com>; ckloser@hntb.com <ckloser@hntb.com>; Bennett, Nicholas <nbennett@hntb.com>; Joel Brown <joelbrown@hntb.com>; James Robinette <jrobinette@hntb.com>; DOT SWR Interstate Study <DOTSWRInterstateStudy@dot.wi.gov>

Subject: [EXTERNAL] I-39/90/94 Concurrence Point #2

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Hello,

As a follow up to Concurrence Point 1 for the I-39/90/94 Corridor Study, we are now at Concurrence Point 2, which is to request concurrence on WisDOT's recommended preferred alternative.

You can use this link <https://wisdot.box.com/s/gx7khnpxkxtp7qudjw34uc24ox5flq> to review the following:

- Preferred Alternatives memo. The memo references the Alternatives Screening Analysis previously reviewed during Concurrence Point 1. I am sending that document along for your reference.
- Coordination Plan (revised). The plan updates include updated contact information and schedule.

You will note the schedule shows Concurrence Point #2 for the Preferred Alternative beginning April 1, 2024 and concluding May 1, 2024.

I kindly request your concurrence by May 1.

Sincerely,

David Schmidt, P.E. | Project Manager

Wisconsin Department of Transportation (DTSD)

Southwest Region Madison Office

PDS Dane 2 Unit

Phone: 608-246-3867

Cell: 608-516-9041

David2.Schmidt@dot.wi.gov

wisconsindot.gov





DEPARTMENT OF THE ARMY
U. S. ARMY CORPS OF ENGINEERS, ST. PAUL DISTRICT
332 MINNESOTA STREET, SUITE E1500
ST. PAUL, MN 55101-1323

February 7, 2023

Regulatory File No. MVP-2023-00063-KDZ

Frank J. Pritzlaff, P.E.
WisDOT Southwest Region–Madison Office
2101 Wright Street
Madison, Wisconsin 53704 2583

Dear Mr. Pritzlaff:

This is in response to your December 12, 2022, letter requesting the U.S. Army Corps of Engineers-St. Paul District Regulatory Division be a cooperating agency for the planning and development of an Environmental Impact Statement (EIS) for the I-39/90/94 Corridor Study between US Highway (US) 12/18 in Madison and US 12/Wisconsin State Highway (WIS) 16 in Wisconsin Dells. It is our understanding that the Federal Highway Administration (FHWA) in cooperation with the Wisconsin Department of Transportation (WisDOT) will be the lead federal agency for initiating the National Environmental Policy Act (NEPA) processes for development of the EIS and public hearings.

It appears that the proposed project(s) would include the deposition of dredged or fill material into waters of the United States (WOTUS) subject to the Corps of Engineers' jurisdiction under Section 404 of the Clean Water Act (Section 404). Section 404 regulations require permit applicants to demonstrate that regulated adverse impacts to WOTUS have been avoided and minimized to the maximum extent practicable, and to compensate for any remaining unavoidable adverse impacts.

We agree to serve as a cooperating agency in preparation of this EIS. We will also uphold our agency responsibilities under the One Federal Decision and Executive Order 13807, to ensure that one EIS and Record of Decision prepared by FHWA will also meet our environmental review requirements. As a cooperating agency, we will provide input regarding the project purpose and need, as well as the evaluation of alternatives. We will also provide input on the impact assessment methodologies for wetlands and other aquatic resources, compensatory mitigation, and comments on the draft and final EIS's. However, please be aware that we do not have the resources to conduct specific environmental analyses beyond the scope of our Section 404 permit review process. We understand that this acceptance will be further codified and our role further identified during subsequent preparation of a Cooperating Agency Agreement.

We appreciate your cooperating agency invitation and look forward to continued coordination on the project. If you have any questions, contact me in our Stevens Point office at (651) 290-5877 or kyle.d.zibung@usace.army.mil. In any correspondence or inquiries, please refer to the Regulatory number shown above.

Sincerely,

Kyle Zibung
Lead Project Manager

Copy electronically furnished to:
Ms. Bethaney Bacher-Gresock, FHWA (Bethaney.Bacher-Gresock@dot.gov)
Mr. Brian Taylor, WisDOT (brianf.taylor@dot.wi.gov)



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, ST. PAUL DISTRICT
332 MINNESOTA STREET, SUITE E1500
ST. PAUL, MN 55101-1323

February 26, 2024

Regulatory File No. MVP-2023-00063-KDZ

David Schmit, P.E.
WisDOT Southwest Region–Madison Office
2101 Wright Street
Madison, Wisconsin 53704 2583

Dear Mr. Schmidt:

We have completed our review of the draft Purpose and Need statement prepared for the Environmental Impact Statement (EIS) for the I-39/90/94 Corridor Study between US Highway (US) 12/18 in Madison and US 12/Wisconsin State Highway (WIS) 16 in Wisconsin Dells. The study will also evaluate I-39 from its split with I-90/94 (I-39 I-90/94 split) to Levee Road near Portage. The study corridor is 67 miles long and travels through Dane, Columbia, Sauk and Juneau counties.

We concur with the draft Purpose and Need statement. Based on the information provided to the Corps, the Purpose and Need statement would satisfy CWA Section 404 review requirements. The purpose of the I-39/90/94 Corridor Study is to address existing and future traffic demands, safety issues, aging and outdated infrastructure and corridor resiliency. In addition, we concur with the Alternatives Screening Analysis (January 2024) and also the Draft Impact Analysis (January 2023) with the following comment: Section 5 in the Draft Impact Analysis describes the general methodologies for assessing impacts to waters resources and floodplains. We recommend incorporating the procedures found in Section 2 of the St. Paul District Stream Mitigation Procedures Version 1.0 for evaluating stream impacts and functional loss. This document can be obtained at:

https://www.mvp.usace.army.mil/Portals/57/docs/regulatory/Mitigation/MVP_Stream_Mitigation_Procedures_version_1.pdf?ver=mV5VYSnslcFh2RvRNq50Ew%3d%3d

Please continue to coordinate with our agency as you proceed with drafting the Environmental Impact Statement. If you have any questions, contact me in our Stevens Point office at (651) 290-5877 or via email at: kyle.d.zibung@usace.army.mil. In any correspondence or inquiries, please refer to the Regulatory number shown above.

Sincerely

Kyle Zibung
Lead Project Manager

cc:

Bethaney Bacher-Gresock, FHWA (Bethaney.Bacher-Gresock@dot.gov)
Brian Taylor, WisDOT (brianf.taylor@dot.wi.gov)



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, ST. PAUL DISTRICT
332 MINNESOTA STREET, SUITE E1500
ST. PAUL, MN 55101-1323

May 7, 2024

Regulatory File No. MVP-2023-00063-KDZ

David Schmit, P.E.
WisDOT Southwest Region–Madison Office
2101 Wright Street
Madison, Wisconsin 53704 2583

Dear Mr. Schmidt:

We have completed our review of the I-39/90/94 Concurrence Point #2: Preferred Alternatives Memorandum (April 1, 2024 Memo) describing alternatives that will be evaluated in the Draft Environmental Impact Statement (DEIS) for the I-39/90/94 Corridor Study between US Highway (US) 12/18 in Madison and US 12/Wisconsin State Highway 16 in Wisconsin Dells. The study will also evaluate I-39 from its split with I-90/94 (I-39 I-90/94 split) to Levee Road near Portage. The study corridor is 67 miles long and travels through Dane, Columbia, Sauk and Juneau counties.

We concur with the Summary of Recommended Preferred Alternatives presented in the April 1, 2024 Memo and selection of the Modernization Plus Added General-Purpose Lane and Modernization Hybrid Alternatives for further study in the DEIS.

Please continue to coordinate with our agency as you proceed with drafting the Environmental Impact Statement. If you have any questions, contact me in our Stevens Point office at (651) 290-5877 or via email at: kyle.d.zibung@usace.army.mil. In any correspondence or inquiries, please refer to the Regulatory number shown above.

Sincerely

Kyle Zibung
Lead Project Manager

cc:
Bethaney Bacher-Gresock, FHWA (Bethaney.Bacher-Gresock@dot.gov)
Brian Taylor, WisDOT (brianf.taylor@dot.wi.gov)

January 25, 2024

Zach Zopp
Environmental Planner IV
Planning and Technical Services
Phone 608-807-3144
Email zzopp@hntb.com
HNTB CORPORATION
10 W Mifflin Street | Madison, WI 53703

SUBJECT: Farmland Protection Policy Act (FPPA)

PROJECT I.D: Interstate 39/90/94 Corridor Study, Columbia County, Wisconsin.

I have reviewed the Farmland Conversion Impact Rating form submitted with your email dated 01/19/2024, with respect to the requirements of the Farmland Protection Policy Act for the above referenced project. Since this project falls under the exemptions listed below, no further action is necessary on your part to comply with its requirements.

523.10 Lands Covered by the Act

B. Lands Not Subject to Provisions of FPPA

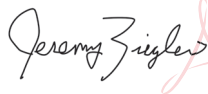
(1) Lands that receive a combined score of less than 160 points from the LESA criteria

523.11 Activities Covered by the Act

E. Other Exemptions

(1) Small acreages (i.e., 10 acres or less per linear mile or 3 acres where there is a project for an existing bridge or interchange) where a statewide, local, or tribal LESA system has been approved by the state conservationist. Acreage includes both direct and indirect conversions. These exemptions are to avoid new construction and encourage improvements to existing linear projects, such as highways.

Sincerely,



Digitally signed by
JEREMY ZIEGLER
Date: 2024.01.29
10:48:40 -06'00'

Jeremy Ziegler
Area 4 Resource Soil Scientist
451 West North Street
Juneau, WI 53039
Office: 920-386-9999 Ex. 3022
Govt cell: 920-210-9007
Email: jeremy.ziegler@usda.gov

Cc:

January 25, 2024

Zach Zopp
Environmental Planner IV
Planning and Technical Services
Phone 608-807-3144
Email zzopp@hntb.com
HNTB CORPORATION
10 W Mifflin Street | Madison, WI 53703

SUBJECT: Farmland Protection Policy Act (FPPA)

PROJECT I.D: Interstate 39/90/94 Corridor Study, Dane County, Wisconsin.

I have reviewed the Farmland Conversion Impact Rating form submitted with your email dated 01/19/2024, with respect to the requirements of the Farmland Protection Policy Act for the above referenced project. Since this project falls under the exemptions listed below, no further action is necessary on your part to comply with its requirements.

523.10 Lands Covered by the Act

B. Lands Not Subject to Provisions of FPPA

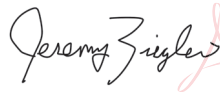
(1) Lands that receive a combined score of less than 160 points from the LESA criteria

523.11 Activities Covered by the Act

E. Other Exemptions

(1) Small acreages (i.e., 10 acres or less per linear mile or 3 acres where there is a project for an existing bridge or interchange) where a statewide, local, or tribal LESA system has been approved by the state conservationist. Acreage includes both direct and indirect conversions. These exemptions are to avoid new construction and encourage improvements to existing linear projects, such as highways.

Sincerely,



Digitally signed by JEREMY
ZIEGLER
Date: 2024.01.29 12:56:32
-06'00'

Jeremy Ziegler
Area 4 Resource Soil Scientist
451 West North Street
Juneau, WI 53039
Office: 920-386-9999 Ex. 3022
Govt cell: 920-210-9007
Email: jeremy.ziegler@usda.gov

Cc:

January 25, 2024

Zach Zopp
Environmental Planner IV
Planning and Technical Services
Phone 608-807-3144
Email zzopp@hntb.com
HNTB CORPORATION
10 W Mifflin Street | Madison, WI 53703

SUBJECT: Farmland Protection Policy Act (FPPA)

PROJECT I.D: Interstate 39/90/94 Corridor Study, Juneau County, Wisconsin.

I have reviewed the Farmland Conversion Impact Rating form submitted with your email dated 01/19/2024, with respect to the requirements of the Farmland Protection Policy Act for the above referenced project. Since this project falls under the exemptions listed below, no further action is necessary on your part to comply with its requirements.

523.10 Lands Covered by the Act

B. Lands Not Subject to Provisions of FPPA

(1) Lands that receive a combined score of less than 160 points from the LESA criteria

523.11 Activities Covered by the Act

E. Other Exemptions

(1) Small acreages (i.e., 10 acres or less per linear mile or 3 acres where there is a project for an existing bridge or interchange) where a statewide, local, or tribal LESA system has been approved by the state conservationist. Acreage includes both direct and indirect conversions. These exemptions are to avoid new construction and encourage improvements to existing linear projects, such as highways.

Sincerely,

JEFFREY
DENIGER

Jeff Deniger
Area 3 Resource Soil Scientist
26136 Executive Lane Suite 105
Richland Center, WI 53581
Office: 608-647-8874 ex116
Govt cell: 608-219-9326
Email: jeff.deniger@wi.usda.gov

 Digitally signed by JEFFREY
DENIGER
Date: 2024.01.25 14:21:49
-06'00'

Cc: Jon Field, District Conservationist, NRCS, Mauston

January 25, 2024

Zach Zopp
Environmental Planner IV
Planning and Technical Services
Phone 608-807-3144
Email zzopp@hntb.com
HNTB CORPORATION
10 W Mifflin Street | Madison, WI 53703

SUBJECT: Farmland Protection Policy Act (FPPA)

PROJECT I.D: Interstate 39/90/94 Corridor Study, Sauk County, Wisconsin.

I have reviewed the Farmland Conversion Impact Rating form submitted with your email dated 01/19/2024, with respect to the requirements of the Farmland Protection Policy Act for the above referenced project. Since this project falls under the exemptions listed below, no further action is necessary on your part to comply with its requirements.

523.10 Lands Covered by the Act

B. Lands Not Subject to Provisions of FPPA

(1) Lands that receive a combined score of less than 160 points from the LESA criteria

523.11 Activities Covered by the Act

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(1) Small acreages (i.e., 10 acres or less per linear mile or 3 acres where there is a project for an existing bridge or interchange) where a statewide, local, or tribal LESA system has been approved by the state conservationist. Acreage includes both direct and indirect conversions. These exemptions are to avoid new construction and encourage improvements to existing linear projects, such as highways.

Sincerely,

JEFFREY
DENIGER

 Digitally signed by JEFFREY
DENIGER
Date: 2024.01.25 14:19:08
-06'00'

Jeff Deniger
Area 3 Resource Soil Scientist
26136 Executive Lane Suite 105
Richland Center, WI 53581
Office: 608-647-8874 ex116
Govt cell: 608-219-9326
Email: jeff.deniger@wi.usda.gov

Cc: Jon Field, District Conservationist, NRCS, Mauston

From: Gundlach, David - FPAC-NRCS, WI <david.gundlach@usda.gov>
Sent: Friday, March 1, 2024 3:04 PM
To: Caron Kloser <CKloser@HNTB.com>; Olson, Stephaney - FPAC-NRCS, WI <stephaney.olson@usda.gov>; Qualy, Laurel - FPAC-NRCS, WI <laurel.qualy@usda.gov>
Cc: Kobryn, Jennifer - DOT <jennifer.kobryn@dot.wi.gov>; Schmidt, David - DOT (DTSD) <David2.Schmidt@dot.wi.gov>; Helmrick, Michael - DOT <Michael.Helmrick@dot.wi.gov>; Taylor, Brian F - DOT <BrianF.Taylor@dot.wi.gov>; Nicholas Bennett <nbennett@HNTB.com>; Zach Zopp <zzopp@HNTB.com>; James Robinette <jrobinette@HNTB.com>; DOT SWR Interstate Study <dotswinterstatestudy@dot.wi.gov>
Subject: RE: [External Email]I-39/90/94 Study WRP coordination ENV AGC

External Email: Use caution when clicking on links, replying, or opening attachments.

Caron and Friends,

Attached is a memo from my engineer, Kyle Wedel, explaining the results of his investigation into the potential impacts to Wetland Reserve Easement infrastructure as a result of the proposed reconstruction of the interstate/interchange.

Please let me know if you need any additional information regarding the NRCS Baraboo River wetland easements.

Dave

David Gundlach | Assistant State Conservationist - Easements | Wisconsin State Office - Madison
Cell 608-751-5276



Date: February 29, 2024
From: Kyle Wedel, State Agricultural Engineer
Madison, WI
To: Dave Gundlach, Assistant State Conservationist- Easements
Madison, WI
Subject: Baraboo River WRP
Columbia County, WI

This memo is in response to the I-39 interstate corridor being adjusted and raising the 100-year flood event by 0.70 in the WRP easement area.

It is uncertain whether raising the flood elevation of the Wisconsin River by 0.70 in the WRP easement area will have a negative impact to the easement infrastructure. In the original design process, it was determined that the Baraboo River would overtop the infrastructure in a 10-year storm event while the Wisconsin River would not overtop the infrastructure in the 10-year storm event. As a result, no models developed by the NRCS illustrate a relationship between the Wisconsin River and the WRP easement infrastructure.

The I-39 interstate east of the WRP easement was overtopped by a 100-year storm event in 2008. The interstate is approximately 4' higher than the WRP easement infrastructure. It is assumed, the Wisconsin River would overtop the easement infrastructure in the 100-year storm event if not already overtopped from the Baraboo River. The increase in the flood elevation will not affect the WRP easement infrastructure. However, the internal water level when the river overtops the infrastructure may cause failure.

At the upstream end of the infrastructure the Baraboo River dike has a breach. This allows the river at lower flood elevations to move into the WRP easement pooling area. This fills the pooling area up. When the Baraboo River overtops the infrastructure, the water level on the inside and outside of the infrastructure are equal. This allows the infrastructure to be overtopped without failing or erosion damage. It is believed when the Wisconsin River backs up the I-39 bridge over the Baraboo River restricts the flow of the Baraboo River causing it to mimic the Baraboo River flooding scenario mentioned above. If the I-39 bridge is expanded or Wisconsin/Baraboo River is allowed to freely pass through the I-39 section modeling is needed to determine the impact on the WRP infrastructure.

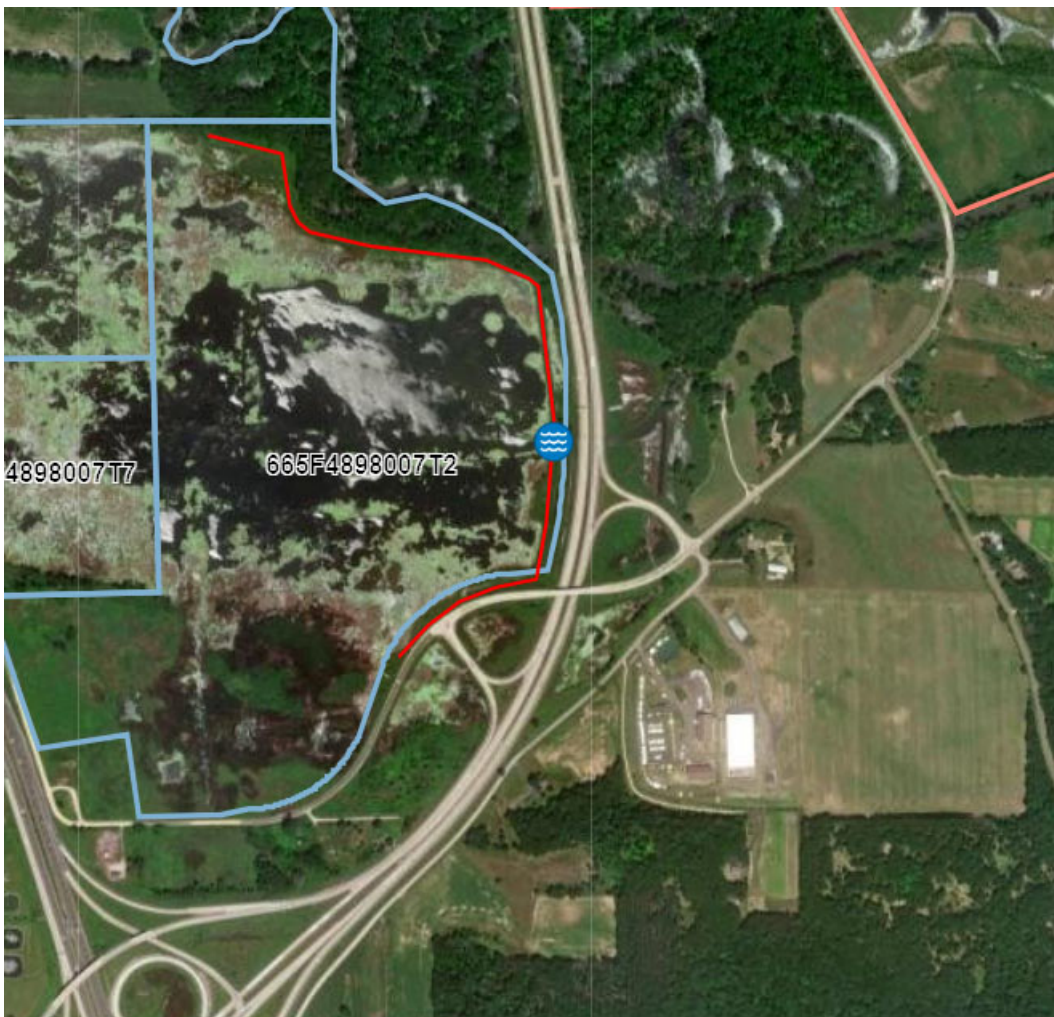
In addition, this WRP infrastructure is classified under the Wisconsin DNR large dam. The DNR should be contacted for any additional permitting, modeling, etc. that they may require as part of these changes.

Connie Sutton

From: Gundlach, David - FPAC-NRCS, WI <david.gundlach@usda.gov>
Sent: Thursday, March 7, 2024 8:24 AM
To: Caron Kloser; Olson, Stephaney - FPAC-NRCS, WI; Qualy, Laurel - FPAC-NRCS, WI
Cc: Kobryn, Jennifer - DOT; Schmidt, David - DOT (DTSD); Helmrick, Michael - DOT; Taylor, Brian F - DOT; Nicholas Bennett; Zach Zopp; James Robinette; DOT SWR Interstate Study; Barta, Andrew H - DNR; Heggelund, Eric P - DNR; Peterson, Bill; Bedford, Timothy; Elise Ibendahl
Subject: RE: [External Email]I-39/90/94 Study WRP coordination ENV AGC

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The DNR map location is definitely erroneous. As you suggested, the WRP embankment and pool area are located west of I-39. See screenshot below:



I do not believe NRCS has any further concerns with the project as proposed. Unless you all have other items that warrant discussion, I think we're good to go.

David Gundlach | Assistant State Conservationist - Easements | Wisconsin State Office - Madison
Cell 608-751-5276

From: Caron Kloser <CKloser@HNTB.com>

Sent: Wednesday, March 6, 2024 10:35 AM

To: Gundlach, David - FPAC-NRCS, WI <david.gundlach@usda.gov>; Olson, Stephaney - FPAC-NRCS, WI <stephaney.olson@usda.gov>; Qualy, Laurel - FPAC-NRCS, WI <laurel.qualy@usda.gov>

Cc: Kobryn, Jennifer - DOT <jennifer.kobryn@dot.wi.gov>; Schmidt, David - DOT (DTSD) <David2.Schmidt@dot.wi.gov>; Helmrick, Michael - DOT <Michael.Helmrick@dot.wi.gov>; Taylor, Brian F - DOT <BrianF.Taylor@dot.wi.gov>; Nicholas Bennett <nbennett@HNTB.com>; Zach Zopp <zzopp@HNTB.com>; James Robinette <jrobinette@HNTB.com>; DOT SWR Interstate Study <dotswrinterstatestudy@dot.wi.gov>; Barta, Andrew H - DNR <Andrew.Barta@wisconsin.gov>; Heggelund, Eric P - DNR <Eric.Heggelund@wisconsin.gov>; Peterson, Bill <bill.peterson@fws.gov>; Bedford, Timothy <Timothy.Bedford@jacobs.com>; Elise Ibendahl <Elise.Ibendahl@jacobs.com>

Subject: RE: [External Email]I-39/90/94 Study WRP coordination ENV AGC

Hello Dave,

Thanks for your team's timely review and comments. I am copying USFWS and WDNR for awareness as well.

I first wanted to confirm the location of the infrastructure on the WRP easement.

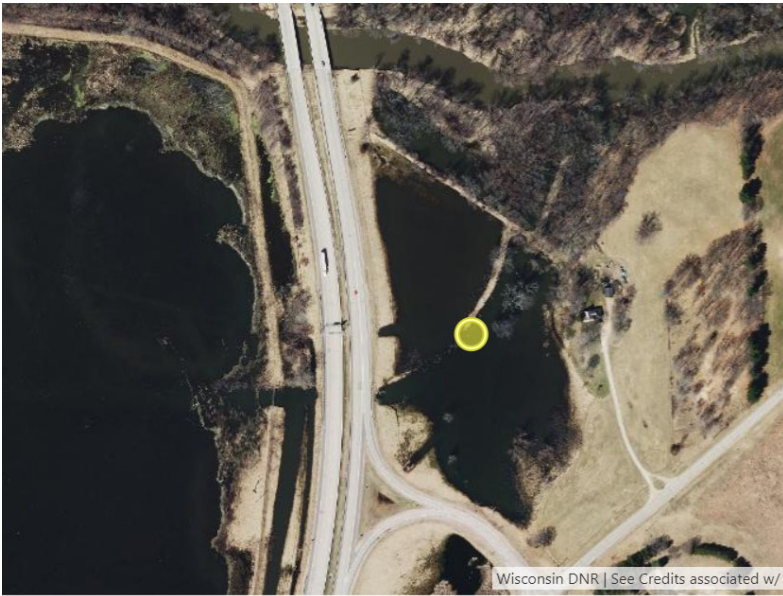
Our team reviewed Dam Safety Inventory site for the WRP: <https://apps.dnr.wi.gov/dam/Dam/Detail/5513>

When you go to the map tab it shows up on the east side of I-39, see screenshot below. But wondering if this is an error. The listed normal storage is 310 ac-ft and the ponded area shown to the east of I-39 in the screenshot is roughly 4 acres. The ponded area west of I-39 is >100 acres better matching the listed storage area. Additionally the memo references "I-39 interstate east of the WRP..." so we believe the WRP is what our team has been calling the wetland flow control structure and that is included in the 2D model developed for this area.

The first thing to note is that the project anticipates 0.70 ft of water surface rise during the 100-year event based on the Wisconsin River regulatory model, not the Baraboo River regulatory model. This is because the regulatory definition of the 100-year event excludes the Caledonia Levee on the South side of the Wisconsin River and this area is flooded and I-39 significantly overtopped by the Wisconsin River. Only in the event of a 50-year flood or greater and the failure of the Caledonia Levee would we anticipate a water surface increase on the WRP infrastructure.

For all flood events on the Baraboo River, raising I-39 and widening the Baraboo River bridge would decrease the frequency of WRP infrastructure inundation and when overtopped would route water in the same manner as described for the current condition. Raising I-39 further protects the WRP infrastructure from failure during the 100-year event, no overtopping immediately downstream of the WRP occurs, as it did in 2008.

As information, we have presented the findings from the flood minimization studies to both USFWS and WDNR and would be glad to set up a call with all agencies to further discuss.



Regards,

Caron Kloser AVP

Urban Development and Planning

Tel (414) 410-6776 Cell (414) 975-2030 Email ckloser@hntb.com

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250 E. Wisconsin Avenue, Suite 2000 | Milwaukee, WI 53202 | hntb.com

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From: Gundlach, David - FPAC-NRCS, WI <david.gundlach@usda.gov>

Sent: Friday, March 1, 2024 3:04 PM

To: Caron Kloser <CKloser@HNTB.com>; Olson, Stephaney - FPAC-NRCS, WI <stephaney.olson@usda.gov>; Qualy, Laurel - FPAC-NRCS, WI <laurel.qualy@usda.gov>

Cc: Kobryn, Jennifer - DOT <jennifer.kobryn@dot.wi.gov>; Schmidt, David - DOT (DTSD) <David2.Schmidt@dot.wi.gov>; Helmrick, Michael - DOT <Michael.Helmrick@dot.wi.gov>; Taylor, Brian F - DOT <BrianF.Taylor@dot.wi.gov>; Nicholas Bennett <nbennett@HNTB.com>; Zach Zopp <zzopp@HNTB.com>; James Robinette <jrobinette@HNTB.com>; DOT SWR Interstate Study <dotswrinterstatestudy@dot.wi.gov>

Subject: RE: [External Email]I-39/90/94 Study WRP coordination ENV AGC

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Caron and Friends,

Attached is a memo from my engineer, Kyle Wedel, explaining the results of his investigation into the potential impacts to Wetland Reserve Easement infrastructure as a result of the proposed reconstruction of the interstate/interchange.

Please let me know if you need any additional information regarding the NRCS Baraboo River wetland easements.

Dave

David Gundlach | Assistant State Conservationist - Easements | Wisconsin State Office - Madison
Cell 608-751-5276

From: Caron Kloser <CKloser@HNTB.com>

Sent: Thursday, February 15, 2024 11:52 AM

To: Olson, Stephaney - FPAC-NRCS, WI <stephaney.olson@usda.gov>; Gundlach, David - FPAC-NRCS, WI <david.gundlach@usda.gov>; Qualy, Laurel - FPAC-NRCS, WI <laurel.qualy@usda.gov>

Cc: Kobryn, Jennifer - DOT <jennifer.kobryn@dot.wi.gov>; Schmidt, David - DOT (DTSD) <David2.Schmidt@dot.wi.gov>; Helmrick, Michael - DOT <Michael.Helmrick@dot.wi.gov>; Taylor, Brian F - DOT <BrianF.Taylor@dot.wi.gov>; Nicholas Bennett <nbennett@HNTB.com>; Zach Zopp <zzopp@HNTB.com>; James Robinette <jrobinette@HNTB.com>; DOT SWR Interstate Study <dotswinterstatestudy@dot.wi.gov>

Subject: [External Email]I-39/90/94 Study WRP coordination ENV AGC

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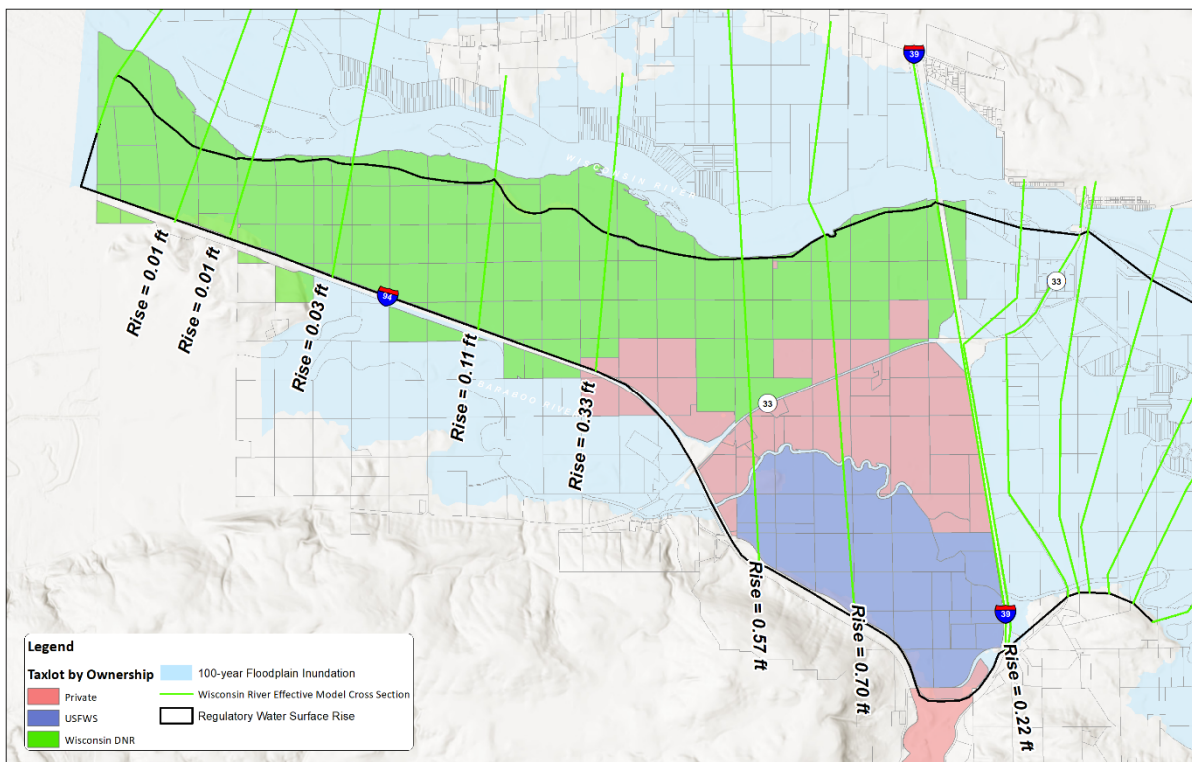
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1012-05-03 ENV AGC

Hello Stephaney, Laurel and David,

Again, thanks for your time to meet regarding NRCS easements and how they intersect with the I-39/90/94 corridor study. Per discussion, I am forwarding requested information.

1. Here is the potential surface water rise in the 100-year floodplain with proposed improvements to raise the Interstate and widen the I-39 Baraboo River crossing to 500 feet. Please forward information about easements on both USFWS and private properties for our team to review. Zach and I will follow up regarding GIS files of the map below.



2. Here is figure showing potential impacts at USFWS property. Red line shows permanent fee acquisition (east of WIS 33), yellow is temporary easement during construction. The temporary easement at Cascade Mountain Road is needed to reconstruct road as shown.



3. This is an image shared with USFWS regarding potential changes in the 100-year surface water elevation at existing USFWS structures.



Caron Kloser AVP

Urban Development and Planning

Tel (414) 410-6776 Cell (414) 975-2030 Email ckloser@hntb.com

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From: [Zach Zopp](#)
To: [DOT SWR Interstate Study](#)
Cc: [Caron Kloser](#); [Connie Sutton](#)
Subject: FW: [External Email]I-39/90/94 Corridor Study - CRP Coordination
Date: Monday, February 26, 2024 2:41:07 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)

1012-05-03 ENV AGC

For the file

Zach Zopp

Planning and Technical Services

Phone 608-807-3144 [Teams](#) Email zzopp@hntb.com

From: Krauss, Ian - FPAC-FSA, WI <Ian.Krauss@usda.gov>
Sent: Thursday, February 22, 2024 7:15 AM
To: Zach Zopp <zzopp@HNTB.com>
Cc: Caron Kloser <CKloser@HNTB.com>; Kobryn, Jennifer - DOT <jennifer.kobryn@dot.wi.gov>
Subject: RE: [External Email]I-39/90/94 Corridor Study - CRP Coordination

External Email: Use caution when clicking on links, replying, or opening attachments.

There is currently no CRP in the floodplain elevation area.

Ian H. Krauss

Agricultural Program Specialist

Wisconsin State Office



8030 Excelsior Drive, Suite 100, Madison, WI 53717

p: 608-662-4422 x129

e: ian.krauss@usda.gov | w: www.fsa.usda.gov/state-offices/Wisconsin/index

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From: Zach Zopp <zzopp@HNTB.com>
Sent: Wednesday, February 21, 2024 3:52 PM
To: Krauss, Ian - FPAC-FSA, WI <Ian.Krauss@usda.gov>

Cc: Caron Kloser <CKloser@HNTB.com>; Kobryn, Jennifer - DOT <jennifer.kobryn@dot.wi.gov>
Subject: RE: [External Email]I-39/90/94 Corridor Study - CRP Coordination

Hi Ian,

Thank you for reviewing CRP contracts within the corridor study area.

Would it be possible for FSA to indicate if the contracts are within either 1) the area expected to see changes to the floodplain elevation or 2) general new right-of-way adjacent the mainline corridor?

Zach Zopp

Planning and Technical Services

Phone 608-807-3144 [Teams](#) Email zzopp@hntb.com

From: Krauss, Ian - FPAC-FSA, WI <ian.Krauss@usda.gov>
Sent: Wednesday, February 21, 2024 11:22 AM
To: Zach Zopp <zzopp@HNTB.com>
Cc: Caron Kloser <CKloser@HNTB.com>; Kobryn, Jennifer - DOT <jennifer.kobryn@dot.wi.gov>
Subject: RE: [External Email]I-39/90/94 Corridor Study - CRP Coordination

External Email: Use caution when clicking on links, replying, or opening attachments.

Good morning Zach,

It appears there currently overlap on three CRP contracts where there will be expected disturbance to the cover - based on current enrollment and the parcel map you shared.

Best,

Ian H. Krauss
Agricultural Program Specialist
Wisconsin State Office



Farm Service Agency
U.S. DEPARTMENT OF AGRICULTURE

8030 Excelsior Drive, Suite 100, Madison, WI 53717

p: 608-662-4422 x129

e: ian.krauss@usda.gov | w: www.fsa.usda.gov/state-offices/Wisconsin/index

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From: Zach Zopp <zzopp@HNTB.com>

Sent: Thursday, February 15, 2024 3:47 PM

To: Krauss, Ian - FPAC-FSA, WI <ian.krauss@usda.gov>

Cc: Caron Kloser <CKloser@HNTB.com>; Kobryn, Jennifer - DOT <jennifer.kobryn@dot.wi.gov>

Subject: RE: [External Email]I-39/90/94 Corridor Study - CRP Coordination

Ian,

8:30am works for us, I'll send out a Teams invitation shortly. Right of way acquisitions will vary across the corridor. I've attached shapefile packages to show you the extent of proposed new right of way across Dane, Columbia, Sauk, and Juneau Counties.

The build alternatives may also increase the flood elevation near where I-39 splits from I-90/94 in Columbia County. We can explain more about this at tomorrow mornings meeting.

Thank you,

Zach Zopp

Planning and Technical Services

Phone 608-807-3144 [Teams](#) Email zzopp@hntb.com

From: Krauss, Ian - FPAC-FSA, WI <ian.krauss@usda.gov>

Sent: Thursday, February 15, 2024 3:15 PM

To: Zach Zopp <zzopp@HNTB.com>

Cc: Caron Kloser <CKloser@HNTB.com>

Subject: RE: [External Email]I-39/90/94 Corridor Study - CRP Coordination

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Let's plan for tomorrow morning, I'll only be around for the morning portion (7 AM to 10 AM). We have a Federal Holiday Monday and I'll be out of office for a training all day Tuesday. Do you have any idea how wide the construction will be? Roughly how far in from the road are we looking? I can try to pull some data on it.

Ian H. Krauss

Agricultural Program Specialist

Wisconsin State Office



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8030 Excelsior Drive, Suite 100, Madison, WI 53717

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From: Zach Zopp <zzopp@HNTB.com>
Sent: Thursday, February 15, 2024 2:25 PM
To: Krauss, Ian - FPAC-FSA, WI <ian.Krauss@usda.gov>
Cc: Caron Kloser <CKloser@HNTB.com>
Subject: [External Email]I-39/90/94 Corridor Study - CRP Coordination

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Ian,

WisDOT is performing a transportation improvement study along a 67-mile stretch of I-39/90/94 between US 12/18 in Dane County and US 12/WIS 16 in Juneau County. The study also includes I-39 from its split with I-90/94 to Levee Rd near the City of Portage. Attached you'll find map showing the general study area.

Transportation improvements are anticipated to require linear strip takings along the mainline and additional new right-of-way for the reconstruction of interchanges.

Would you have availability tomorrow or early next week to begin the coordination process to determine whether the study has the potential to impact any CRP agreements?

My schedule is flexible tomorrow (Friday) and next week Monday or Tuesday.

Thank you,

Zach Zopp

Environmental Planner IV
Planning and Technical Services
Phone 608-807-3144 [Teams](#) Email zzopp@hntb.com

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From: [Taylor, Brian F - DOT](#)
To: [Barta, Andrew H - DNR](#)
Cc: [Heggelund, Eric P - DNR](#)
Subject: RE: I-39/90/94 Corridor Study Cooperating Agency Invitation and Coordination Meeting
Date: Thursday, January 12, 2023 6:55:33 PM
Attachments: [image001.png](#)

Yep, that works !

Thanks,

Brian

From: Barta, Andrew H - DNR <Andrew.Barta@wisconsin.gov>
Sent: Thursday, January 12, 2023 10:03 AM
To: Taylor, Brian F - DOT <BrianF.Taylor@dot.wi.gov>
Cc: Heggelund, Eric P - DNR <Eric.Heggelund@wisconsin.gov>
Subject: FW: I-39/90/94 Corridor Study Cooperating Agency Invitation and Coordination Meeting

Good Morning Brian,

Please see Matt's message below. Let us know if that is sufficient or if DOT needs something else from us. I look forward to working with you on this project and hopefully getting out in the field soon for some reviews!

Andy

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Andy Barta

Phone: 608-235-2955

andrew.barta@wisconsin.gov

From: Matrise, Matthew J - DNR <Matthew.Matrise@wisconsin.gov>
Sent: Thursday, January 12, 2023 9:59 AM
To: Barta, Andrew H - DNR <Andrew.Barta@wisconsin.gov>; Heggelund, Eric P - DNR <Eric.Heggelund@wisconsin.gov>
Subject: RE: I-39/90/94 Corridor Study Cooperating Agency Invitation and Coordination Meeting

Thank you for the reminder on this, I fully support our role as a participating agency at this stage for the aforementioned project. I do not believe anything formal is required, but I will ask Jenny next time we speak on 1/20, but in the meantime please feel free to utilize this email as confirmation of our current role.

Many thanks,

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Matt Matrise

Phone: (262) 933-5233

Matthew.Matrise@wisconsin.gov

From: Barta, Andrew H - DNR <Andrew.Barta@wisconsin.gov>
Sent: Thursday, January 12, 2023 9:19 AM
To: Matrise, Matthew J - DNR <Matthew.Matrise@wisconsin.gov>
Subject: FW: I-39/90/94 Corridor Study Cooperating Agency Invitation and Coordination Meeting

FYI

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Andy Barta

Phone: 608-235-2955

andrew.barta@wisconsin.gov

From: Taylor, Brian F - DOT <BrianF.Taylor@dot.wi.gov>

Sent: Tuesday, January 10, 2023 4:29 PM

To: Heggelund, Eric P - DNR <Eric.Heggelund@wisconsin.gov>; Barta, Andrew H - DNR <Andrew.Barta@wisconsin.gov>

Subject: RE: I-39/90/94 Corridor Study Cooperating Agency Invitation and Coordination Meeting

Evening Guys !

The project team would like an official email from Matt as official notification that WDNR will be a participating agency for the I39/90/94 (Wisconsin Dells-Madison) major.

Thank you,

Brian

From: Taylor, Brian F - DOT

Sent: Friday, January 6, 2023 3:44 PM

To: Heggelund, Eric P - DNR <Eric.Heggelund@wisconsin.gov>

Subject: RE: I-39/90/94 Corridor Study Cooperating Agency Invitation and Coordination Meeting

Hey Eric !

I think I need an official response from Matt ccing you and Andy stating that it has been received and that WDNR will be a participating agency.

Thanks and have a great weekend !

Brian

From: Heggelund, Eric P - DNR <Eric.Heggelund@wisconsin.gov>

Sent: Friday, January 6, 2023 2:33 PM

To: Taylor, Brian F - DOT <BrianF.Taylor@dot.wi.gov>

Subject: RE: I-39/90/94 Corridor Study Cooperating Agency Invitation and Coordination Meeting

Hey Brian,

Since you sent this over to the team, I'll assume we don't need to send another response – letter or email. Let me know if you think we should.

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Eric Heggelund

Phone: (608) 228-7927

eric.heggelund@wisconsin.gov

From: Taylor, Brian F - DOT <BrianF.Taylor@dot.wi.gov>

Sent: Monday, January 02, 2023 7:52 PM

To: Heggelund, Eric P - DNR <Eric.Heggelund@wisconsin.gov>

Cc: Barta, Andrew H - DNR <Andrew.Barta@wisconsin.gov>

Subject: RE: I-39/90/94 Corridor Study Cooperating Agency Invitation and Coordination Meeting

Evening Guys !

Thanks for the heads up. I have forwarded to the project team.

Brian

From: Heggelund, Eric P - DNR <Eric.Heggelund@wisconsin.gov>

Sent: Tuesday, December 20, 2022 1:31 PM

To: Taylor, Brian F - DOT <BrianF.Taylor@dot.wi.gov>

Cc: Barta, Andrew H - DNR <Andrew.Barta@wisconsin.gov>

Subject: RE: I-39/90/94 Corridor Study Cooperating Agency Invitation and Coordination Meeting

Hi Brian,

We have discussed this internally with Matt and are going to be a participating agency rather than a cooperating agency. We can send a response to the email stating that, but wanted to let you know first. Since you are out until January, we will wait a couple weeks to respond.

Cheers,

Eric

We are committed to service excellence.

Visit our survey at <http://dnr.wi.gov/customersurvey> to evaluate how I did.

Eric Heggelund

Phone: (608) 228-7927

eric.heggelund@wisconsin.gov

From: Wisconsin DOT <admin@pima.wisconsindot.gov>
Sent: Monday, December 12, 2022 11:24 AM
Subject: I-39/90/94 Corridor Study Participating Agency Invitation and Coordination Meeting
Attachments: I-39_90_94_Corridor_Study_-_Agency_Coordination_Meeting.ics; 2022_12_12_Interstate_State-Fed-Agency_PA_invite_DATCP.pdf



I-39/90/94 Corridor Study

Hello,

Your agency is invited to become a Participating Agency for the I-39/90/94 Corridor Study in Dane, Columbia, Sauk and Juneau Counties, Wisconsin. The attached letter provides additional information about the study and the Participating Agency's role.

You are also invited to an online Agency Coordination meeting on January 30, 2023 where we will provide more information on the study purpose and need, the range of alternatives, and anticipated preliminary impacts. A calendar invitation is attached for your convenience or a link to the meeting is provided below.

I-39/90/94 Agency Coordination Meeting - Monday, January 30th, 2023, beginning at 10:30 a.m.

- For video and audio: Access the meeting via your web browser, Teams app, or mobile device using the following link: [Click here to join the meeting](#)
- For audio-only: Call into the meeting by phone. You will hear the presentation and may ask questions. The conference call number is (608) 571-2209, and enter conference ID is 952 869 317#

Should you have any questions about the study, please contact me via e-mail at Frank.Pritzlaff@dot.wi.gov. Please remember to respond to our invitation to be a Cooperating Agency by January 11, 2023, and I look forward to meeting you on January 30.

Sincerely,



Frank J. Pritzlaff P.E.

Project Manager

I-39/90/94 Corridor Study

✉ Frank.Pritzlaff@dot.wi.gov

📞 (608) 246-3803

Unfortunately, this email is an automated notification, which is unable to receive replies. For questions, comments, or concerns, please email Frank Pritzlaff directly at Frank.Pritzlaff@dot.wi.gov. Thank you!



8-17-23

Daniel Schave
Wisconsin Department of Transportation – SW Region
2101 Wright Street
Madison WI 53704

Subject: Comments on Notice of Intent to Prepare an EIS

I-39/90/94
Madison – Wisconsin Dells
Dane, Columbia, Sauk, Juneau Counties

Dear Mr. Schave:

The Wisconsin Department of Natural Resources (DNR) has reviewed the Notice of Intent to prepare an Environmental Impact Statement for a proposed highway project: Madison to Wisconsin Dells, Wisconsin as published to the Federal Register on 7-18-23 and the Additional Information Document provided.

From the published notice of intent, the Preliminary Purpose and Need for the proposed action is as follows:

“The purpose of the I-39/90/94 study is to address existing and future traffic demands, safety issues, aging and outdated corridor infrastructure, and corridor resiliency. The need for proposed improvements sets the stage for developing and evaluating possible alternatives. Traffic volumes and congestion are increasing, impacting travel reliability. Heavy recreational, commuting and freight traffic uniquely affect traffic operations in the study corridor. Recreational traffic occurs typically on Fridays and Sundays in the summer. Crashes at many locations along the study corridor exceed the statewide average crash rate. Congestion and geometric/design deficiencies contribute to elevated crash rates. Pavement maintenance projects are anticipated in 24 of the next 30 years somewhere in the study corridor, which presents ongoing travel delay and congestion for daily commercial and recreational traffic. There are 113 structures in the I-39/90/94 study corridor. 84 structures will be over 50 years old in the year 2030. In addition to aging structures, many bridges do not meet current vertical and lateral design standards. Flood events in 2008 and 2018 caused partial or full interstate closures, impacting corridor resilience. Closures disrupt vital connections for commerce and emergency services. The closures cause substantial indirection for detoured traffic, causing congestion and delays on alternate routes. The study's purpose and need statement may be revised based on the consideration of public and agency comments.’

Alternatives:

The Wisconsin Department of Transportation (WisDOT) will Analyze and consider several different alternatives to determine how well they address the study purpose need. Additional screening criteria will consider environmental impacts, public and agency input, and cost. Alternatives under current consideration range from no improvements to several iterations of build alternatives detailed further below.

No Build Alternative

This alternative assumes no improvements to the I-39/90/94 mainline or interchanges outside of already scheduled projects (STH 60 interchange, Wisconsin River Bridges). This alternative does not meet the purpose or need of this study however it will be retained as a baseline to compare other impacts to.

Transportation Demand Management/Transportation System Management and Operations Alternative

This alternative considers strategies to reduce personal vehicular traffic, shift travel to alternative routes or times, and to better maximize existing transportation's facilities' capacity. Some examples include park-and-rides, ramp metering, reversible lanes, and crash investigation sites. While these options alone do not meet the purpose and need of this study, they can be incorporated into other alternatives to further improve the interstate corridor.

Off Alignment (East Reliever)

A previous study evaluated four alternatives for an off alignment route east of the current interstate highway corridor. WisDOT has eliminated this alternative from further study due to greater impacts and negative public reaction. The DNR agrees with this decision and sees little value in further consideration of this alternative.

Spot Improvements

This alternative retains the existing interstate configuration and only includes spot safety improvements such as addressing interchanges with high crash rates and priority bridge replacement. As this does not meet the study purpose and need, this alternative will not be considered in this study.

Freeway Modernization

WisDOT will continue to evaluate three Build modernization alternatives that would reconstruct the freeway to modern design standards whenever possible. Under the modernization alternatives, WisDOT will consider safety first; replace deteriorating pavement, bridges and culverts; move all ramp movements to the right, eliminating lefthand entrances and exits; improve ramp lengths and bridge clearances; expand shoulders; improve roadway curves, lighting and signage; consider opportunities to add bike and pedestrian facilities; and add noise walls where feasible and reasonable. WisDOT will also consider implementing strategies to improve operations, including Collector-Distributor (C-D) Lanes, Managed Lanes, and/or Auxiliary Lanes in each of the modernization alternatives (see Figure 3-1). All the modernization alternatives are generally within the existing right of way but depending on specific site conditions and alternative design, additional impacts outside the right of way could occur. These Build alternatives will be evaluated as additional data on purpose and need and other screening factors, such as impacts to natural and cultural resources, are developed. In the vicinity of the I-39 I-90/94 Split, where the interstate mainline has been impacted by prior flood events, all modernization alternatives include a combination of profile adjustments and waterway crossing design to reduce flood risk.

Expected Impacts to be Evaluated:

The EIS will evaluate the potential social, economic, and environmental impacts/effects resulting from the implementation of the Build and No Build alternatives. FHWA and WisDOT will seek input from the public and agencies during the EIS development process regarding the effects of the project. WisDOT identified preliminary impacts of alternatives, which is provided in the NOI Additional Information document. The following key resources and issues have been identified for evaluation in the EIS and supporting technical studies:

- Wetlands and Waters of the United States
- Floodplains
- Section 4(f) and/or Section 6(f) Public Lands
- Section 4(f) and/or Section 106 Historic Resources
- Threatened and Endangered Species
- Right of Way Acquisition and Relocations
- Farmland and Agricultural Impacts
- Noise
- Environmental Justice

While the above list is broad enough to cover a wide range of potential impacts, DNR anticipates WisDOT will follow the Cooperative Agreement procedures to address any other resource issues or concerns that are identified while developing the study.

Additionally, DNR submits that water quality (stormwater) considerations be included in the above list. The Transportation Construction General Permit (TCGP) could be added to the list of anticipated permits and authorizations as well. NR 151 water quality standards as required under the TCGP should be considered when evaluating project alternatives, particularly at new and reconfigured interchanges.

Continued Coordination:

The DNR has accepted a participating agency status through the development of this EIS and looks forward to continued coordination through the study process and project design.

If you have any questions, please contact the offices below:

Madison to STH 60:

STH 60 to Wis Dells:

Eric Heggelund, Transportation Liaison
3911 Fish Hatchery Road
Fitchburg, WI 53711
(608) 228-7927
eric.heggelund@wisconsin.gov

Andy Barta, Transportation Liaison
3911 Fish Hatchery Road
Fitchburg, WI 53711
(608) 235-2955
andrew.barta@wisconsin.gov

Sincerely,

Andy Barta

Environmental Analysis & Review Specialist

cc: Brian Taylor – WisDOT REC
Peter Fillipi – WisDOT SWEC
Sam Kube – WisDOT SWEC
Eric Heggelund – DNR
Caron Kloser - HNTB
Bethany Bacher-Gresock – DOT
Kyle Zibung – USACE
Sarah Quamme - USFWS



10-17-2023

Frank Pritzlaff
WisDOT SW Region
2101 Wright Street
Madison, WI 53704

Subject: I-39/90/94 EIS Response to Information Request

Project I.D. 1012-05-03
Interstate 39/90/94
(USH 12/18 – WIS 16/USH 12)
Dane/Columbia/Sauk/Juneau Counties

Dear Mr. Pritzlaff:

The Wisconsin Department of Natural Resources (DNR) has received the information you provided for the Interstate 39/90/94 Environmental Impact Study (EIS) development project. According to your proposal, the purpose of this project is to address existing and future traffic demands, safety issues and aging and outdated corridor infrastructure. WisDOT will evaluate a range of alternatives in the EIS. Anticipated alternatives could include travel demand management, spot reconstruction improvements and modernizing the highway through reconstruction that may or may not include capacity expansion.

Preliminary information for the project corridor has been reviewed by DNR staff for the project under the DNR/DOT Cooperative Agreement. These comments are provided as requested to assist in development of the EIS. We may provide additional and more specific comments during project development phases according to the DNR/DOT Cooperative Agreement.

Public Lands:

There are several public natural and recreational areas located near or adjacent to the highway within the study corridor. Some of these areas have been identified by WisDOT as potentially being impacted by various alternatives under consideration in this study. Many public properties have state and federal encumbrances that require additional coordination prior to any impacts. In many cases, these processes are lengthy and it is advised to avoid and minimize all impacts and begin coordination regarding unavoidable impacts as early as possible. WisDOT has requested information regarding these properties, including funding sources, encumbrance information and coordination requirements. Due to the sheer number of properties impacted and complexities of a detailed funding source look-up, DNR real estate has provided a high level screening to identify broad funding sources that could impact DOT's project schedule. An additional detailed screening will occur at the project level initial review request to ensure accuracy.

Land and Water Conservation Fund (LWCF) Lands – Section 6(f) Coordination:

There is property within the project limits that is encumbered with Federal LWCF funds in which we have a legal interest in. We will need to coordinate with our Grants staff and the National Park Service on the Section 6(f) conversion process. Typically, lands converted from a recreational use must be replaced with property of equal market value, acreage, and recreational value.

- Mirror Lake State Park - Land and Water Conservation Funds have been used on this property. Additionally, DNR park staff believe there are scenic easements on some private parcels adjacent to the park.
- Rocky Arbor State Park - Land and Water Conservation Funds have been used on this property.
- Hulbert Creek Fishery Area - Land and Water Conservation Funds have been used on this property.

US DOT Section 4(f) Coordination:

The U.S. Dept. of Transportation “Section 4(f)” process applies to federally funded transportation projects that impact specific properties (e.g. public parks, wildlife refuges, and recreation areas) as well as properties where Pittman-Robertson or Dingle-Johnson funds have been expended. There is property within the project limits that is a specific type of property and/or where federal funds have been expended and is owned by DNR [property name]. If it is determined the project will affect certain portions of this property, early coordination with WDNR will be necessary under the Section 4(f) review process to evaluate the significance of potential impacts on the uses and management of this property.

The Pine Island Wildlife area has a multitude of different funding sources used on various parcels. Additional details can be found in the attached map and spreadsheet below.



PinelsMap_FedInter Fed_Interest_FeeTitl
est.pdf e_Pinelsland.xlsx



Glacial Drumlin Trail extension under I39/90/94

This is a proposed trail extension that would construct a “missing link” for the local and regional trail network by connecting the City of Madison and the Capital City Trail to the WDNR managed Glacial Drumlin State trail and communities to the east. This project has not been constructed but it is expected to be completed prior to any construction project on the interstate through the area. Some alternatives included in the EIS may result in temporary closures to the trail to build bridges over the top of this trail.

Wetlands:

WisDOT consultants have conducted wetland delineations for the EIS study area and submitted reports to DNR detailing location and description of wetlands identified along the corridor. We have completed preliminary desktop reviews of the provided wetland delineation reports. Although we did not identify any major concerns with the methodology or results of the studies, further project review and follow up field evaluations with WisDOT would likely be needed to provide additional comments or complete delineation review. It should be noted that wetland delineation concurrence is typically considered valid for up to five years. After that time period, it is often necessary to conduct additional field work to verify

wetland boundaries. Since it is likely to be several years prior to any potential detailed project development, we may want to conduct field verification of wetlands closer to project design review, if necessary. We believe that it would be reasonable to use the wetlands as identified in these delineations for evaluations of project alternatives in the EIS.

Natural Heritage Inventory

To assist with the development of the EIS, DNR and WisDOT have begun early coordination regarding Natural Heritage Inventory (NHI) threatened, endangered and special concern species identified as potentially occurring near the corridor. DNR has provided WisDOT with a list and general location information for species identified during a review of the NHI database. WisDOT consultants have initiated review for potential NHI species habitat along the corridor. Further coordination and surveys for NHI species may be useful to assist with EIS development. There may be subsequent coordination and survey requirements for NHI species during project development phases.

Waterway Crossings and Resources

The below represent a high level overview of waterway crossings that may be impacted by this project. Specific details such as in-water work restriction dates will be addressed through the project design phase.

Dane County

Pennito Creek – warm-water; impaired (total phosphorus)

Door Creek – warm-water; impaired (total phosphorus)

West Branch Starkweather Creek – warm-water; impaired (chronic aquatic toxicity, PFOS, contaminated fish tissue, chloride, total phosphorus).

Token Creek – Cool-warm mainstem; portions are Class III trout stream; General condition is considered good.

Yahara River – warm-water fishery; general condition is considered good and supports a good warm-water sport fishery as far upstream as Deforest.

Columbia County

Rowan Creek – Class II trout stream, General Condition is considered Excellent.

Baraboo River – Warm water sport fishery and Canoe Trail, impaired (total phosphorus)

Sauk County

Dell Creek (Mirror Lake) – Warm Water sport fishery, ERW

Spring Brook – Cool headwater forage fishery, General Condition is considered Good

Hulbert Creek – Class I & Class II trout water, ERW, General Condition is Considered Good

Aquatic Connectivity at Road-Stream Crossings:

The coordination and implementation process for aquatic connectivity at road-stream crossings is described in an attachment to the DNR/DOT Cooperative Agreement. We recommend following the procedures described in this attachment during project planning and design to review aquatic organism passage and stream connectivity. When appropriate, DNR may be able to assist WisDOT in field

reviews of specific crossings to identify concerns that may be addressed by projects on the corridor. Initial structure reviews by consultants may also assist in identifying areas of concern.

Invasive Species:

Roadways and travel corridors are known to be significant vectors leading to the spread of invasives species. DOT consultants have surveyed and evaluated the project corridor for threatened or endangered species as well as documenting areas of invasive species. While developing this EIS, consideration should be given to how this project may spread these species and ways to mitigate that spread. Additionally, opportunities to address populations of invasives species should be addressed as well. Special consideration should be given to species listed as Prohibited under NR 40.

<https://dnr.wisconsin.gov/topic/invasives/classification>

Native seeding and planting:

In order to provide habitat for pollinator species as well as enhance local floral communities, we recommend utilizing native seeding and screening/living snow fence to the extent practicable. Native seeding is especially important in areas adjacent to quality habitat features such as state parks, wildlife areas, and state natural areas.

Floodplains:

The Surface Water Data Viewer (SWDV) indicates that there are special flood hazard areas (e.g., mapped floodplain areas) within the project limits. Proposed temporary or permanent changes in these regulated floodplain areas require that DOT coordinate with the appropriate zoning authority. Examples of floodplain encroachments include but are not limited to: changes to waterway crossings; culvert extensions; changes to road surface elevations and/or side-slopes; temporary causeways; temporary structures; general fill. To ensure compliance with the DOT/DNR Cooperative Agreement [floodplain attachment](#), and intent of Wis. Admin. Code, Chapter NR116, please copy the DNR Transportation Liaison when project related floodplain impact information is shared with the appropriate zoning authority.

Storm Water Management & Erosion Control:

For projects disturbing an acre or more of land erosion control and storm water measures must adhere to the Wisconsin Pollutant Discharge Elimination System Transportation Construction General Permit (TCGP) for Storm Water Discharges. Coverage under TCGP is required prior to construction. WisDOT should apply for permit coverage by submitting a Notice of Intent (NOI) prior to, or when requesting Final Concurrence. Permit coverage will be issued by DNR with the Final Concurrence letter after design is complete and documentation shows that the project will meet construction and post-construction performance standards. For more information regarding the TCGP you can go to the following link, and click on the "Transportation" tab: <https://dnr.wi.gov/topic/Sectors/Transportation.html>

During the EIS and project design phases, pay particular attention to the post construction standards required under the TCGP through NR 151. Based on the information provided so far, it appears some project areas will require a change from a rural cross section to an urban stormwater conveyance (concentrated flow with curb and gutter or barrier wall). These changes will require the appropriate TSS reduction as outlined in NR 151. Final concurrence requests should include documentation describing compliance with applicable NR 151 post construction stormwater treatment standards.

Other:**Access to Dekorra Wildlife Area**

DNR respectfully asks that a gated access to the DNR owned lands west of the rest area be included in this project. This access could be comparable to the access currently provided to the Town of Dekorra parcel north of the rest area. Access would be for DNR staff only to conduct property management

activities such as habitat improvements and prescribed burns. Currently, property access from CTH V is often hampered by wet conditions that make it difficult or impossible to access with equipment needed to safely perform operations during the appropriate times. Access from the rest area would allow DNR staff to manage the property and habitats safely and effectively. Preferred gate locations are shown in the attached PDF however we are open to other options that best fit DOT's needs.



Possible Gate
Locations if installed

The above comments represent the DNR's early concerns for the proposed EIS development, as requested. Further comment will be granted after further review of project plans, Erosion Control Plan, Wetland Impact Tracking Form, Special Provisions, NOI for the TCGP, and additional coordination if necessary. If any of the concerns or information provided in this letter requires further clarification, please contact this office.

Sincerely,

Andy Barta

Andy Barta
Environmental Analysis & Review Specialist

Eric Heggelund

Eric Heggelund
Environmental Analysis & Review Specialist

cc: Brian Taylor – WisDOT
Caron Kloser - HNTB
Charlie Webb – Jacobs
Jeff Held - Strand
Daniel Schave – WisDOT



February 14, 2024

David Schmidt
WisDOT Project Manager
SW Region Field Office
2101 Wright Street
Madison, WI 53704

Subject: **Agency Coordination Point #1:**
Purpose and Need, Coordination Plan, Impact Analysis Methodology and Alternatives
Screening Analysis
Project I.D. 1012-05-01
IH-39/90/94 Corridor Study
Madison Beltline Interchange EIS
Dane, Columbia, Sauk and Juneau Counties, WI

Dear Mr. Schmidt,

We have received the information that you provided on January 12, 2024, regarding the Interstate Highway 30/90/94 Corridor EIS project. The Federal Highway Administration (FHWA) and the Wisconsin Department of Transportation (WisDOT) are investigating alternatives to address the existing and future traffic demands, safety issues, aging and outdated infrastructure and corridor resiliency of the interstate corridor in Dane, Columbia, Sauk and Juneau counties. The submittal includes a statement on the Purpose and Need with supporting and background information, the Coordination Plan, Impact Analysis Methodology and Alternatives Screening Analysis.

The Wisconsin Department of Natural Resources (DNR) has jurisdiction and special expertise with respect to environmental impacts involved in the proposed project and will provide input throughout the environmental process. As a policy, we will review and provide comments and point out concerns, but we cannot grant concurrence until the DEIS is complete and released for public comment. We have reviewed the submitted documents and as requested, have the following comments regarding the Purpose and Need, Coordination Plan, Impact Analysis Methodology and Alternatives Screening Process.

Purpose and Need:

The stated purpose of the study is to address existing and future traffic demands, safety issues, aging and outdated infrastructure and corridor resiliency. Several needs for the project have been identified including traffic demands, northbound and southbound weaving, overcapacity ramps, safety needs, pavement condition, bridge condition, and corridor flooding. The need and the objectives for the proposed action are further described in the submitted documentation. We agree that the purpose and need for the project have been adequately addressed in the Purpose and Need submittal. We have no further comments or concerns with the purpose and need of this study.

Coordination Plan:

The purpose of the coordination plan for the Interstate 39/90/94 Corridor Study is to communicate how and when the FHWA and WisDOT, as lead agencies, will coordinate public and agency participation and comment in the environmental review process for this project. The communication must ensure that environmental information is available to public officials and citizens before decisions are made or actions are taken. We have reviewed the document including the coordination plan schedule and the defined agency roles and responsibilities. The DNR will review and provide input and expertise on the EIS as a participating agency. When requested, we will provide written documentation that the information to-date is adequate, so that the project can be advanced to the next stage. As stated, this does not imply that the project has been approved or that we would be released from our obligation to consider the fully developed project as well as public input. Additionally, DNR will provide further comments and project review during subsequent project phases such as design and construction. We appreciate the opportunity to comment and provide input throughout the corridor study process and look forward to working with the lead agencies on this project.

Impact Analysis Methodology:

The purpose of the IAM report is to communicate and document the approach that the Lead Agencies will use in analyzing impacts of the proposed project and alternatives. The DNR, as a participating agency with jurisdiction and expertise over many of the environmental resources identified in the IAM, will coordinate with the lead agencies regarding environmental resources that may be impacted by the project. We will review environmental reports, such as wetland delineations, and will participate in discussions regarding resource impact as well as avoidance and mitigation measures. We agree that the methodology described in the document follows acceptable practice for this type of study. Below we provide comments on additional information or discussion that could be included in the study:

Upland Habitat/Wildlife Impact

The study may consider utilizing county GIS and/or regional planning commission (ex. CARPC) GIS environmental corridor information as an additional resource to identify potentially important upland and wildlife habitat. The project analysis should consider opportunities to minimize impacts or improve connectivity of environmental corridors.

Stormwater and Total Maximum Daily Load (TMDLs)

The project should consider including discussion regarding any post-construction stormwater impacts and treatment requirements under likely applicable regulations. The study is located within or close to approved TMDL areas, including the Wisconsin River TMDL, the Rock River TMDL and the Upper Fox – Wolf TMDL. Analysis and consideration should be given to impacts or requirements associated with the TMDLs and/or other elements of the WisDOT stormwater management program such as the WisDOT Transportation Separate Storm Sewer System (TS4) permit. Additionally, previous interdepartmental coordination has identified the Mirror Lake area as a location that would be addressed in this EIS. Consideration should be made to reduce the potential for highway runoff to negatively impact Mirror Lake.

Alternatives Screening Analysis:

The alternatives screening process identifies and eliminates certain alternatives that the lead agencies believe do not address one of the study's needs including existing and future travel demands, safety, pavement needs, bridge needs and corridor resiliency. WisDOT is advancing alternatives that they consider meeting the study purpose and need. The screening process provides a ranking system to identify if alternatives were better or worse than meeting objectives and also identified preliminary environmental impacts and costs relative to each other. We do not have concerns with the methodology described to screen alternatives. In addition, we do not have specific comments on the alternatives carried forward for future analysis. We may review and provide comment on environmental impacts of alternatives as requested during future phases of the study and during project design phases.

Thank you for the opportunity to participate in the planning stages of this project. If any of the concerns or information provided in this letter requires further clarification, please contact Eric Heggelund at 608-228-7927 or eric.heggelund@wisconsin.gov or Andy Barta at 608-235-2955 or andrew.barta@wisconsin.gov.

Sincerely,

Eric Heggelund

Eric Heggelund
Environmental Analysis & Review Specialist

Andy Barta

Andy Barta
Environmental Analysis & Review Specialist

cc:
Brian Taylor, WisDOT REC
Caron Kloser, HNTB



5-2-2024

David Schmidt, WisDOT Project Manager
Wisconsin Department of Transportation
Southwest Region – Madison Office
2101 Wright Street
Madison WI 53704

Subject: I-39/90/94 Corridor Study – Concurrence Point 2

Recommended Preferred Alternatives

I-39/90/94

Dane, Columbia, Sauk, & Juneau Counties

Dear Mr. Schmidt:

Thank you for the opportunity to review and provide comment on the recommend preferred alternatives memo and coordination plan for the I-39/90/94 corridor study. This study aims to address aging infrastructure and capacity on the I-39/90/94 corridor between Madison and the Wisconsin Dells. Additionally WisDOT is studding options to address high water and flooding concerns at the I-39 and I-90/94 interchange near Portage, sometimes referred to as the Petro Interchange. The Wisconsin Department of Natural Resources has reviewed the preferred alternatives pursuant to the WisDOT/Wis DNR Cooperative Agreement and NR. 150. The below represent the DNR agency comments to WisDOT and FHWA on this study.

Summary of Recommended Preferred Alternatives

Freeway/Interchange	Recommended Preferred Alternative
I-39/90/94 Freeway	Modernization Plus Added General-Purpose Lane
I-94/WIS 30 Interchange	Full Modernization Alternative #2
Milwaukee Street Interchanged (Proposed New)	Partial Cloverleaf
US 151/High Crossing Boulevard Interchange	Directional
Hoepker Road Interchange (Proposed New)	Shifted Diamond
US 51 Interchange	Partial Cloverleaf
WIS 19 Interchange	U-Ramp
County V Interchange	No Build

County CS interchange	Diamond
I-39 & I-90/94 Split Interchange	Low Build
WIS 33 Interchange at I-39	Diamond
WIS 33 Interchange at I-90/94	Partial Cloverleaf
USH 12 Interchange	Diverging Diamond
WIS 23 Interchange	Diamond
WIS 13 Interchange	Trumpet
USH 12/WIS 16 Interchange	Diamond

New Interchanges: Milwaukee Steet and Heopker Road

The DNR recommends information regarding secondary impacts be included in the Draft EIS. Any local or regional development plans that could be associated with the new interchanges would be good documentation of potential and foreseeable development resulting from this project.

Stream Impacts and Mitigation

The DNR recommends details regarding the quantity and quality of potential impacts to streams and aquatic ecosystems be documented within the Draft EIS. Additionally, opportunities for stream mitigation projects that could be incorporated into the project should be included as well. For example, opportunities for the project to replace culverts and crossings that currently hinder aquatic organism passage could be seen as providing a functional lift to the affected resources.

Stormwater Post-Construction Standards

DNR recommends details regarding the preliminary stormwater management plan be included in the draft EIS. The preliminary plant should address the post-construction treatment standards required throughout the project area. Post Construction standards should comply with NR 151 standards as required through the TCGP and TS4 permit.

The Wisconsin Department of Natural resources concurs with carrying the preferred alternatives forward for additional study within the EIS. The preferred alternatives balance the project needs and purposes with environmental impacts and the DNR has no specific concerns with advancing any of the preferred alternatives at this time. The Department looks forward to continued coordination and addressing the environmental impacts through our standard coordination process as outlined by the WisDOT/WisDNR Cooperative agreement.

If you have any questions, please contact this office at the contacts listed below.

Sincerely,

Andy Barta

Andy Barta
Environmental Analysis & Review Specialist
STH 60 to Northern Terminus

Eric Heggelund

Eric Heggelund
Environmental Analysis & Review Specialist
Southern Terminus to STH 60

cc: Jennifer Kobryn – WisDOT
Michael Helmrick – WisDOT
Brian Taylor – WisDOT
Caron Kloser – HNTB
Joel Brown - HNTB

From: [Pritzlaff, Frank J - DOT](#)
To: [Zopp, Zach P - DATCP](#)
Cc: [Schave, Daniel L - DOT](#); [Wisconsin DOT](#); [Bacher-Gresock, Bethaney](#); [Smith, Katy A - DATCP](#); [Taylor, Brian F - DOT](#); [Caron Kloser](#)
Subject: RE: I-39/90/94 Corridor Study Participating Agency Invitation and Coordination Meeting
Date: Monday, December 19, 2022 3:05:44 PM

Thanks Zach. We appreciate DATCP's participation and look forward to meeting you and discussing the corridor on January 30th.

Merry Christmas and Happy New Years to you and your family!

[Frank J. Pritzlaff, P.E.](#)

WisDOT - Southwest Region
Project Manager
Major Studies/PDS
frank.pritzlaff@dot.wi.gov
(O) 608-246-5443
(M) 608-419-4520



From: Zopp, Zach P - DATCP <zach.zopp@wisconsin.gov>
Sent: Monday, December 19, 2022 2:09 PM
To: Pritzlaff, Frank J - DOT <Frank.Pritzlaff@dot.wi.gov>
Cc: Wisconsin DOT <admin@pima.wisconsin.gov>; Bacher-Gresock, Bethaney <Bethaney.Bacher-Gresock@dot.gov>; Smith, Katy A - DATCP <Katy.Smith@wisconsin.gov>
Subject: RE: I-39/90/94 Corridor Study Participating Agency Invitation and Coordination Meeting

Frank,

The Agricultural Impact Statement Program, as part of the WI Department of Agriculture, Trade, and Consumer Protection, agrees to participate on the Interstate 39/90/94 Corridor Study with the WI Department of Transportation. I will attend the upcoming coordination meeting on January 30, 2023.

Please also cc'd Katy Smith on future Department level communications regarding this project.

Sincerely,

Zach Zopp
Agricultural Impact Statement Program Manager
Bureau of Land and Water Resources - Division of Agricultural Resource Management
WI Department of Agriculture, Trade and Consumer Protection
608-224-4650
zach.zopp@wisconsin.gov

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From: Schmidt, David - DOT (DTSD) <David2.Schmidt@dot.wi.gov>
Sent: Friday, February 9, 2024 12:54 PM
To: Caron Kloser; Nicholas Bennett; Kobryn, Jennifer - DOT
Subject: FW: DATCP Concurrence Statement - I-39/90/94 Corridor Study

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fyi

David Schmidt, P.E. | Project Manager

Wisconsin Department of Transportation (DTSD)

Southwest Region Madison Office

PDS Dane 2 Unit

Phone: 608-246-3867

Cell: 608-516-9041

David2.Schmidt@dot.wi.gov



Schedule:

Monday – Thursday: 7:30 am to 5:00 pm

Friday: 7:30 am to 11:30 am

Tuesdays and Wednesday in the Office

From: Biefeld, Kirsten K - DATCP <kirstenk.biefeld@wisconsin.gov>
Sent: Friday, February 09, 2024 10:51 AM
To: Schmidt, David - DOT (DTSD) <David2.Schmidt@dot.wi.gov>
Subject: DATCP Concurrence Statement - I-39/90/94 Corridor Study

Hi David,

In reviewing the shared documents (Purpose and Needs Summary, Coordination Plan, Impact Analysis Methodology, Alternatives Screening Analysis) for the I-39/90/94 Corridor Project, WI DATCP as a participating agency does not have any comments, edits, or suggestions in regards to how these documents are written or the process being used to forward corridor design alternatives for further study. Regarding the project, DATCP will prepare and submit an Agricultural Impact Statement before April 22, 2024 as we complete an analysis of the project's potential agricultural impacts.

Let me know if you need more information or for us to share this in a different format.

Thank you,
Kirsten

Kirsten Biefeld

Pronouns: She/her/hers

Agricultural Impact Statement (AIS) Program Manager and Land Conservation Specialist

Division of Agricultural Resource Management

Wisconsin Department of Agriculture, Trade & Consumer Protection

kirstenk.biefeld@wisconsin.gov

608-224-4650

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From: [Zach Zopp](#)
To: [DOT SWR Interstate Study](#)
Cc: [Caron Kloser](#); [Connie Sutton](#)
Subject: FW: I-39/90/94 Corridor Study - CREP Coordination
Date: Monday, February 26, 2024 2:42:12 PM
Attachments: [image005.png](#)

1012-05-03 ENV AGC

For the file

Zach Zopp

Planning and Technical Services

Phone 608-807-3144 [Teams](#) Email zzopp@hntb.com

From: Smith, Katy A – DATCP <Katy.Smith@wisconsin.gov>
Sent: Friday, February 23, 2024 10:55 AM
To: Zach Zopp <zzopp@HNTB.com>
Cc: Caron Kloser <CKloser@HNTB.com>; Biefeld, Kirsten K - DATCP <kirstenk.biefeld@wisconsin.gov>
Subject: RE: I-39/90/94 Corridor Study - CREP Coordination

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Hi Zach,

Thanks for chatting this morning about CREP. As discussed, the CREP enrollment information, like CRP, has privileged status. A review of records indicates that the statement below is accurate for the impacted agricultural areas and for the broader floodplain area provided to Brian Loeffelholz on February 16th. As a matter of clarification to reconcile what you heard from me this morning and FSA last week, the 2 agreements discussed in the yellow sentence are in the 100 year floodplain, but just outside of the projected area of impact within the floodplain.

Here's a tentative draft of information that may be included in the AIS pertaining to CREP:

The CREP program pays eligible agricultural landowners enrolled within the program to install filter strips along waterways or to return continually flooded fields to wetlands while leaving the remainder of the adjacent land in agricultural production. To be eligible for CREP payments, a recipient must have agricultural lands in crop production that are within 150 ft of a stream or water body or 1,000 ft from a grassland project area (DATCP, 2019). CREP enrollment information is privileged to the USDA, Cooperators, such as the Department, and program participants. A review of the Department's CREP records indicate that as of February 2024, the Project will abut or encroach upon two effective CREP agreements. Construction activities for the Project may directly or indirectly increase the occurrence of stormwater runoff, erosion and sedimentation on lands in the project corridor. Additionally, changes to elevation of the Project area in a floodplain may affect the hydrology of surrounding areas and impact two nearby CREP agreements within the 100-year floodplain. The effective status of CREP agreements and new enrollment is subject to change

between the time of this analysis and any proposed construction activity.

The Department advises WisDOT to:

- work with landowners to identify effective CREP agreements prior to any construction or site disturbance activities.
- make a Freedom of Information Act (FOIA) request to USDA-FSA (FSA) within 12 months of and expected construction or site disturbance activities for information regarding the location of effective CREP agreements to facilitate planning for how to mitigate impacts to enrolled lands and if termination to any part of an effective contract (CRP-1) is necessary
- consult with the Department prior any construction or site disturbance activities to determine if any CREP easements with expired federal contracts will be impacted by the project corridor

If any portion of the CRP-1 contract is terminated by USDA-FSA, the corresponding area under the state CREP agreement must also be terminated. Termination of any part of a CREP agreement requires repayment of any funds issued to the landowner under the terms of the agreement.

Please let us know if you need any additional information or clarification at this time.

Thank you,

Katy Smith

608-224-4621

Katy.Smith@wisconsin.gov

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From: Zach Zopp <zzopp@HNTB.com>

Sent: Friday, February 16, 2024 11:24 AM

To: Loeffelholz, Brian C - DATCP <Brian.Loeffelholz@wisconsin.gov>

Cc: Mockert, Susan S - DATCP <Susan.Mockert@wisconsin.gov>; Smith, Katy A – DATCP <Katy.Smith@wisconsin.gov>; Caron Kloser <CKloser@HNTB.com>; Kobryn, Jennifer - DOT <jennifer.kobryn@dot.wi.gov>

Subject: RE: I-39/90/94 Corridor Study - CREP Coordination

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Brian,

A short call Tuesday afternoon at 2pm would work well for us. I'll send out a Teams invite shortly.

The provided data includes potential floodplain impacts that were not included in the original agricultural impact notification (AIN). We're working to prepare an updated AIN package to re-notify DATCP of the floodplain impacts.

Thank you,

Zach Zopp

Environmental Planner IV
Planning and Technical Services

Phone 608-807-3144 [Teams](#) Email zzopp@hntb.com

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From: Loeffelholz, Brian C - DATCP <Brian.Loeffelholz@wisconsin.gov>

Sent: Friday, February 16, 2024 8:35 AM

To: Zach Zopp <zzopp@HNTB.com>

Cc: Mockert, Susan S - DATCP <Susan.Mockert@wisconsin.gov>; Smith, Katy A – DATCP
<Katy.Smith@wisconsin.gov>

Subject: RE: I-39/90/94 Corridor Study - CREP Coordination

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Zach –

Sure, happy to look to see if there are any CREP sites along the way. The AIS team asked me recently as well. Its on my to-do's.

I am available next Tues afternoon if you need to discuss.

Hope all is well with you and your family,

Brian C. Loeffelholz

Conservation Reserve Enhancement Program Manager/ Land Use & Conservation Specialist/ GIS Analyst

Bureau of Land & Water Resources - Division of Agricultural Resource Management

WI Department of Agriculture, Trade, and Consumer Protection

2811 Agriculture Drive

Madison, WI 53708

608-224-4632

brian.loeffelholz@Wisconsin.gov

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From: Zach Zopp <zzopp@HNTB.com>
Sent: Thursday, February 15, 2024 2:21 PM
To: Loeffelholz, Brian C - DATCP <Brian.Loeffelholz@wisconsin.gov>
Cc: Caron Kloser <CKloser@HNTB.com>; DATCP Ag Impact Statements <datcpagimpactstatements@wisconsin.gov>
Subject: I-39/90/94 Corridor Study - CREP Coordination

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Hi Brian,

WisDOT is performing a transportation improvement study along a 67-mile stretch of I-39/90/94 between US 12/18 (Dane County) and US 12/WIS 16 in Juneau County. The study also includes I-39 from its split with I-90/94 to Levee Rd near the City of Portage. Attached you'll find map showing the study area. This is the same study the AIS program was notified of earlier this January.

Transportation improvements are anticipated to require linear strip takings along the mainline and additional new right-of-way for the reconstruction of interchanges.

Would you have availability tomorrow or early next week to begin the coordination process to determine whether the study has the potential to impact any CREP agreements or perpetual easements?

My schedule is flexible tomorrow (Friday) and next week Monday or Tuesday.

Thank you,

Zach Zopp

Environmental Planner IV
Planning and Technical Services
Phone 608-807-3144 [Teams](#) Email zzopp@hntb.com

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From: Wisconsin DOT <admin@pima.wisconsindot.gov>
Sent: Monday, December 12, 2022 10:24 AM
To: Zopp, Zach P - DATCP zach.zopp@wisconsin.gov>
Subject: I-39/90/94 Corridor Study Participating Agency Invitation and Coordination Meeting



I-39/90/94 Corridor Study

Hello,

Your agency is invited to become a Participating Agency for the I-39/90/94 Corridor Study in Dane, Columbia, Sauk and Juneau Counties, Wisconsin. The attached letter provides additional information about the study and the Participating Agency's role.

You are also invited to an online Agency Coordination meeting on January 30, 2023 where we will provide more information on the study purpose and need, the range of alternatives, and anticipated preliminary impacts. A calendar invitation is attached for your convenience or a link to the meeting is provided below.

I-39/90/94 Agency Coordination Meeting - Monday, January 30th, 2023, beginning at 10:30 a.m.

- For video and audio: Access the meeting via your web browser, Teams app, or mobile device using the following link: [Click here to join the meeting](#)
- For audio-only: Call into the meeting by phone. You will hear the presentation and may ask questions. The conference call number is (608) 571-2209, and enter conference ID is 952 869 317#

Should you have any questions about the study, please contact me via e-mail at Frank.Pritzlaff@dot.wi.gov. Please remember to respond to our invitation to be a Cooperating Agency by January 11, 2023, and I look forward to meeting you on January 30.

Sincerely,



Frank J. Pritzlaff P.E.
Project Manager
I-39/90/94 Corridor Study
✉ Frank.Pritzlaff@dot.wi.gov
☎ (608) 246-3803

Zach Zopp

From: Schmidt, David - DOT (DTSD) <David2.Schmidt@dot.wi.gov>
Sent: Tuesday, April 30, 2024 12:01 PM
To: Caron Kloser; Nicholas Bennett; Zach Zopp
Cc: Kobryn, Jennifer - DOT
Subject: FW: I-39/90/94 Concurrence Point #2

External Email: Use caution when clicking on links, replying, or opening attachments.

Fyi....

David Schmidt, P.E. | Project Manager

Wisconsin Department of Transportation (DTSD)
Southwest Region Madison Office
PDS Dane 2 Unit
Phone: 608-246-3867
Cell: 608-516-9041
David2.Schmidt@dot.wi.gov
wisconsindot.gov



From: Biefeld, Kirsten K - DATCP <kirstenk.biefeld@wisconsin.gov>
Sent: Tuesday, April 30, 2024 11:43 AM
To: Schmidt, David - DOT (DTSD) <David2.Schmidt@dot.wi.gov>
Subject: RE: I-39/90/94 Concurrence Point #2

Hi David,

In reviewing WisDOT's recommended preferred routes and coordination plan for the 1-39/90/94 Corridor Project, WI DATCP as a participating agency does not have any comments, edits, or suggestions in regards to how these documents are written or the process being used. Regarding the project, DATCP has submitted AIS 4472 regarding the I-39/90/94 Corridor Study in which all the alternatives previously recommended for further study were, except those regarding

County V as we had not been provided data for this interchange design alternative within the AIN. DATCP provided agricultural mitigation practice suggestions within Section 5 of the AIS.

Let me know if you need more information or for us to share this in a different format.

Thank you,
Kirsten

Kirsten Biefeld

Pronouns: She/her/hers

Agricultural Impact Statement (AIS) Program Manager and Land Conservation Specialist

Division of Agricultural Resource Management

Wisconsin Department of Agriculture, Trade & Consumer Protection

kirstenk.biefeld@wisconsin.gov

608-224-4650

Please fill out our [customer survey](#) to help us improve. Thank you!

From: Schmidt, David - DOT (DTSD) <David2.Schmidt@dot.wi.gov>

Sent: Monday, April 1, 2024 1:24 PM

Cc: Schmidt, David - DOT (DTSD) <David2.Schmidt@dot.wi.gov>; Kobryn, Jennifer - DOT <jennifer.kobryn@dot.wi.gov>; Helmrick, Michael - DOT <Michael.Helmrick@dot.wi.gov>; Taylor, Brian F - DOT <BrianF.Taylor@dot.wi.gov>; Cloud, Lynn - DOT <Lynn.Cloud@dot.wi.gov>; Kaliszewski, Katherine N - DOT <katherinen.kaliszewski@dot.wi.gov>; Justin M. Arndt, PE <jarndt@kapurinc.com>; Charlie.Webb@jacobs.com; Brian.Andreas@strand.com; jeff.held <jeff.held@strand.com>; ckloser@hntb.com; Bennett, Nicholas <nbennett@hntb.com>; Joel Brown <joelbrown@hntb.com>; James Robinette <jrobinette@hntb.com>; DOT SWR Interstate Study <DOTSWRInterstateStudy@dot.wi.gov>

Subject: I-39/90/94 Concurrence Point #2

Hello,

As a follow up to Concurrence Point 1 for the I-39/90/94 Corridor Study, we are now at Concurrence Point 2, which is to request concurrence on WisDOT's recommended preferred alternative.

You can use this link <https://wisdot.box.com/s/gx7khnpzkxtp7qudjw34uc24ox5flq> to review the following:

- Preferred Alternatives memo. The memo references the Alternatives Screening Analysis previously reviewed during Concurrence Point 1. I am sending that document along for your reference.
- Coordination Plan (revised). The plan updates include updated contact information and schedule.

You will note the schedule shows Concurrence Point #2 for the Preferred Alternative beginning April 1, 2024 and concluding May 1, 2024.

I kindly request your concurrence by May 1.

Sincerely,

David Schmidt, P.E. | Project Manager

Wisconsin Department of Transportation (DTSD)

Southwest Region Madison Office

PDS Dane 2 Unit
Phone: 608-246-3867
Cell: 608-516-9041
David2.Schmidt@dot.wi.gov
wisconsindot.gov

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VILLAGE OF DEFOREST

120 S STEVENSON STREET
 DEFOREST, WI 53532
 PHONE (608) 846-6751
 WWW.VIDEFORST.WI.US

Wisconsin Department of Transportation
 Southwest Region Office
 2101 Wright Street
 Madison, WI 53704

Dear Dan Schave,

The Village of DeForest has reviewed Wisconsin Department of Transportation's ("WisDOT") plans for proposed improvements to the Interstates 39/90/94 adjacent to and through the Village of DeForest. We thank you for the opportunity to respond.

Overall, we agree with WisDOT plans to improve this major transportation corridor which link many communities together and is a conduit to the state of Wisconsin's robust tourism economy. There are different impacts at each of the Village of DeForest's exit points that have led us to the following recommendations. Each will be discussed starting with the southernmost portion of the interstate that bisects DeForest and moving north.

- 1) Highway 51 Alternate 2 is our preferred plan, particularly with consideration for the improvement of a roundabout at the intersection of Highway 51, Williamsburg Way, and Metro Drive. This is a dangerous intersection, with 3 fatalities plus additional crashes in the area, that could use upgrades to improve overall safety and flow. The Village of DeForest has planned and partially built an interior road network to provide alternate traffic routes to the State highways in this area. We anticipate the final piece of this internal network will be completed in the near future as development occurs on the lands west of Highway 51 and south of Highway 19. We are also requesting that WisDOT consider a bike or pedestrian trail along the eastern side of Highway 51.
- 2) Highway 19 interchange is the most challenging and we understand the complexity of improvements. We support alternative number 3 with the addition of a bike/ped trail along the north side of Highway 19. Additional multi-family and commercial business development is planned for the west side of I 39/90/94. This area is contained within a tax increment district, and we expect to see it fully built out before 2036. We feel that alternative number 3 with the north multi-use trail provides for the most efficient flow of traffic by bypassing the rail crossing, makes accessing the interstate safer, and provides a vital link between the different uses in this region through the trail connection and new traffic pattern.
- 3) The Highway V interchange is the latest area to see an increase in demand for growth. The Village has recently annexed over 300 acres in this area and is in the process of amending the tax increment district to include a majority of the annexed lands. This includes lands adjacent to the recently proposed Buc-ees development. The Village anticipates that this new regional destination and the ancillary developments thereafter will redefine this interchange and

therefore will require a significant upgrade of the Highway V interchange to handle the increased traffic. We are uncertain if WisDOT is aware of all the proposed developments that will occur west of the interstate. We strongly recommend Alternate 2 and a diverging diamond interchange. The Village will be extending sewer facilities to this new area of DeForest this year. We believe that Buc-ees's track record of success for attracting complementary businesses will further increase traffic demands and the existing businesses around the interstate and Highway V that support Wisconsin's vital tourism industry demands an enhanced at this interchange.

4) Other considerations:

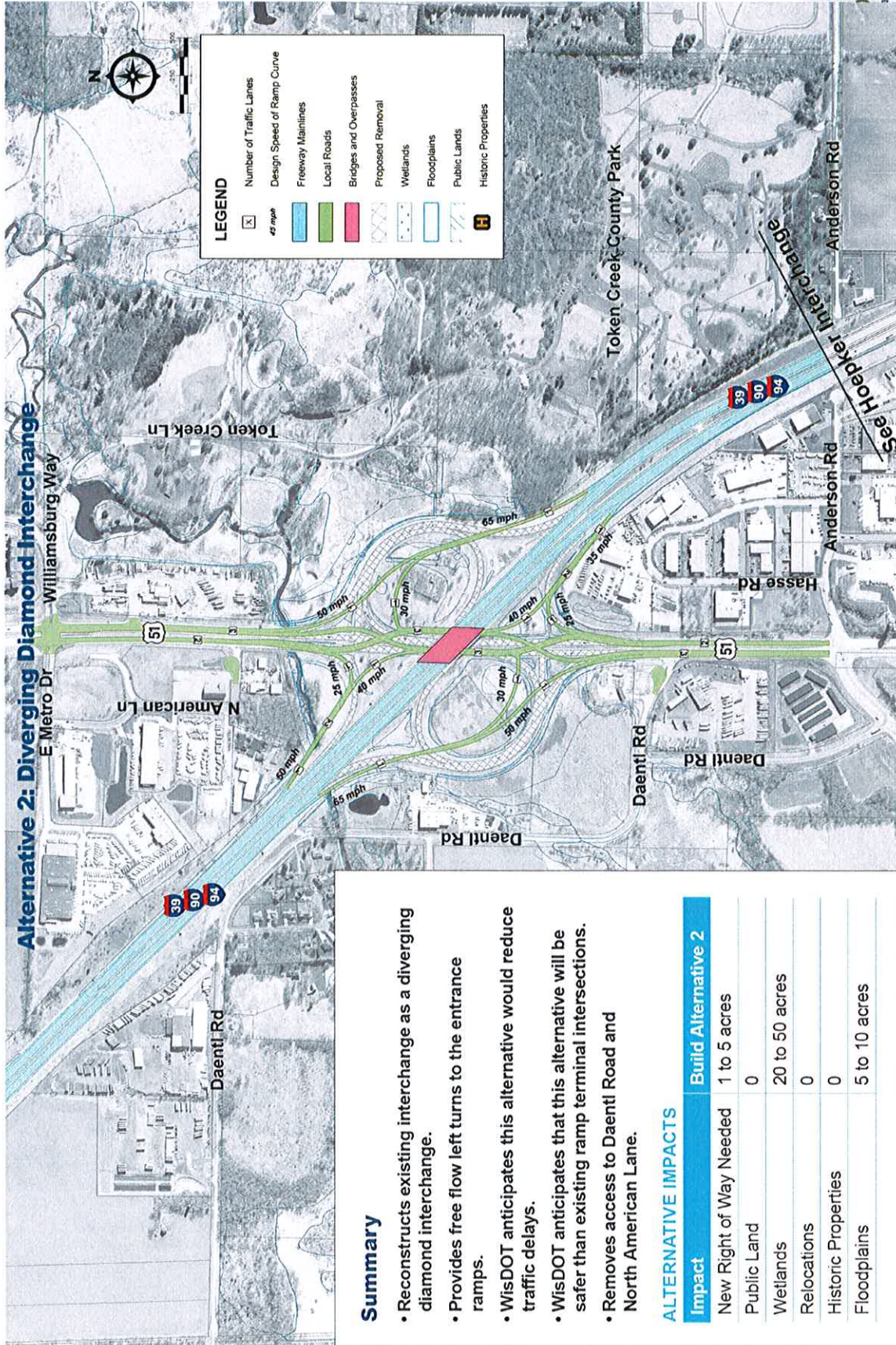
- Daentl Road Interstate Crossing via bridge. This area (currently in the Town of Burke) has approximately 20 residences and a proposed new business development that could include up to 1,000,000 square feet of light industrial facilities. There is currently a Cooperative Plan between the Village of DeForest, Burke, Madison, and Sun Prairie that expires in 2036. Upon the expiration of the Cooperative Plan, this area will automatically attach to the Village. There is currently only one way in and out of the area over the Token Creek. This area we be even more limited with the improvements at the Highway 51 interchange. So, a bridge crossing over the interstate to Pepsi Way would provide an alternative access point to this area greatly enhancing safety and overall traffic flow. This would also alleviate traffic congestion at the Highway 51 and Highway CV intersection.
- Daley Road was bisected by the interstate many years ago. With the increased development pressure to the west side (as stated above for the Highway V interchange), reconnecting this road with an overpass will lessen the local traffic on Highway V and provide for better traffic circulation.
- River Road Bridge over the interstate could be either removed or raised to mitigate the conflict that bridge seems to encounter. Should the bridge be removed, River Road could be extended north and connect into Cuba Valley Road.

We have attached supporting documentation for the various interchanges. We also plan to work on a comprehensive traffic impact analysis for Highway V. We can provide additional information and support that WisDOT may request. We thank you for taking your time to consider the Village of DeForest's needs as one of the fastest growing communities in Dane County.

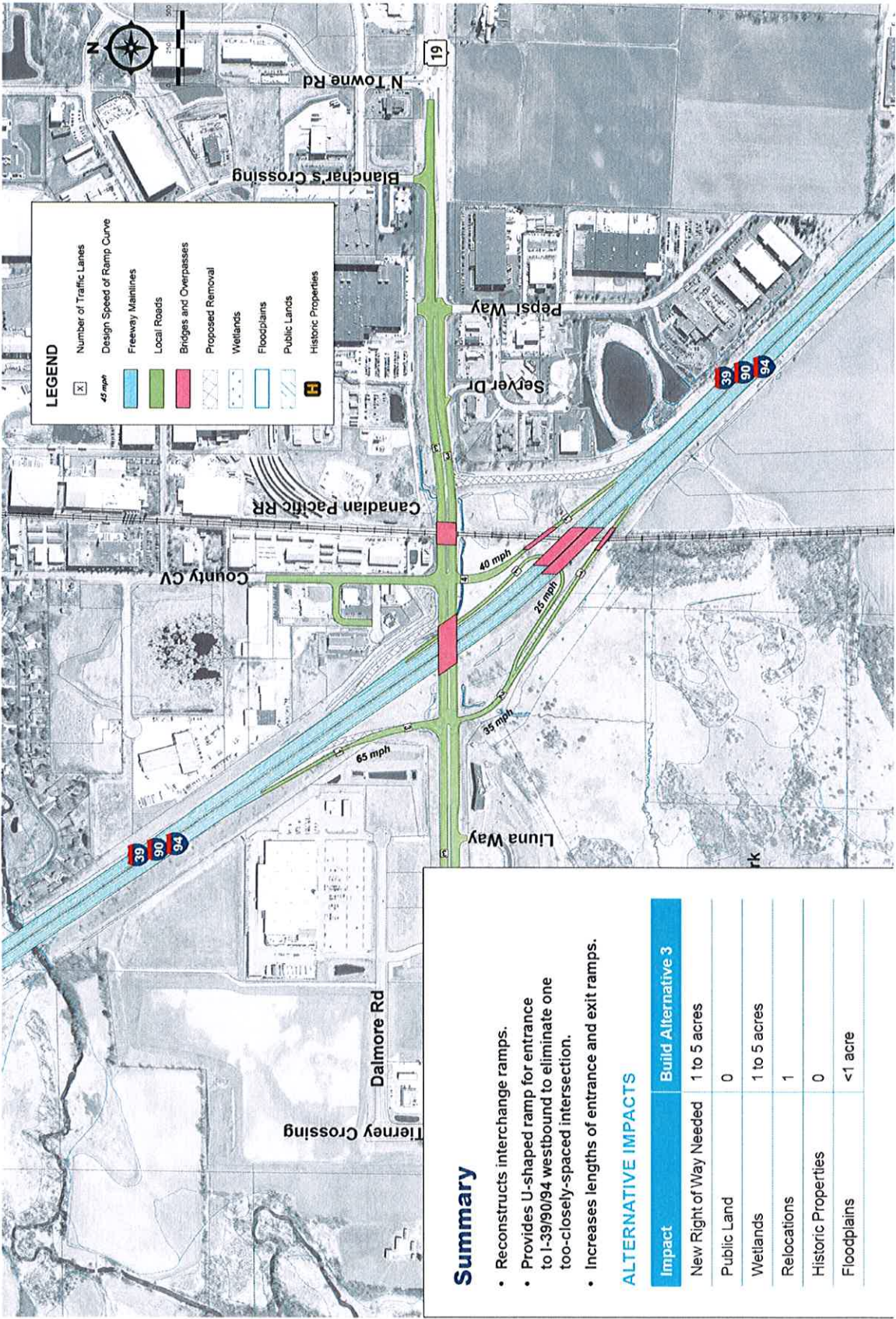
Sincerely,



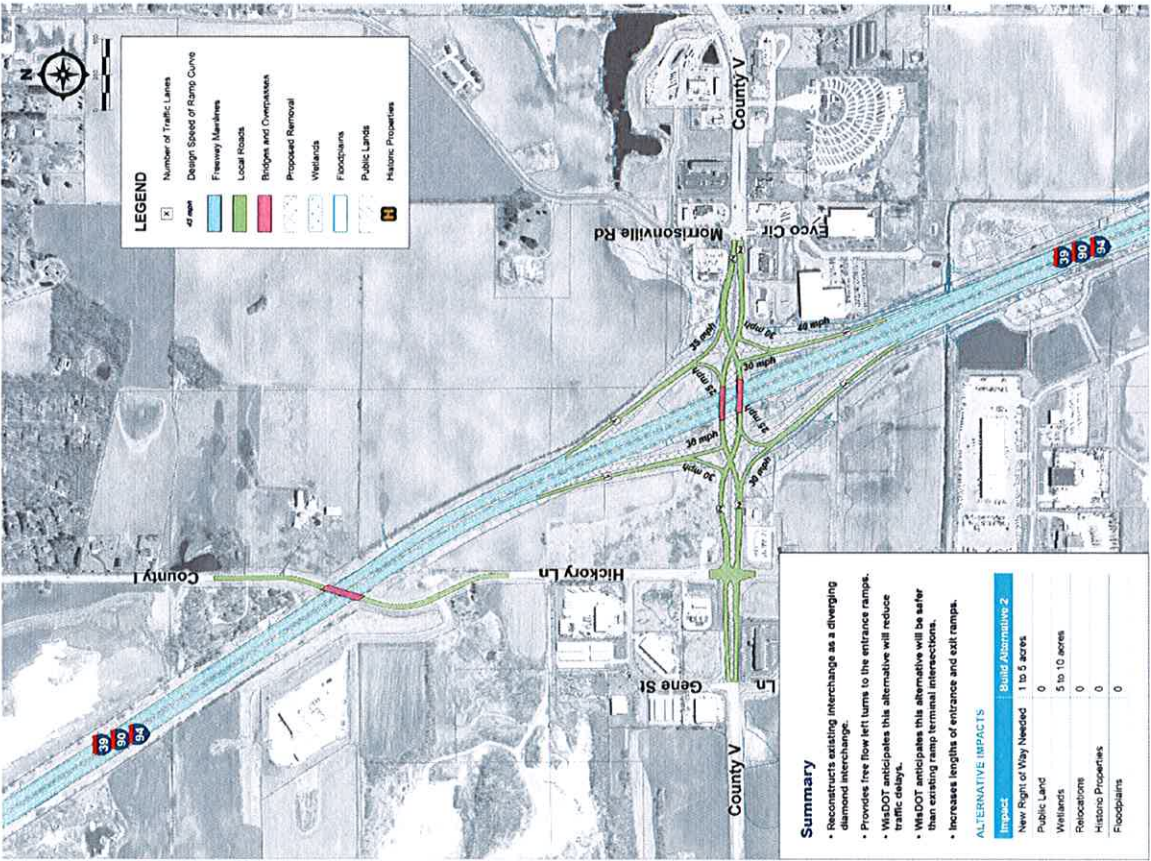
Bill Chang
Village of DeForest Administrator

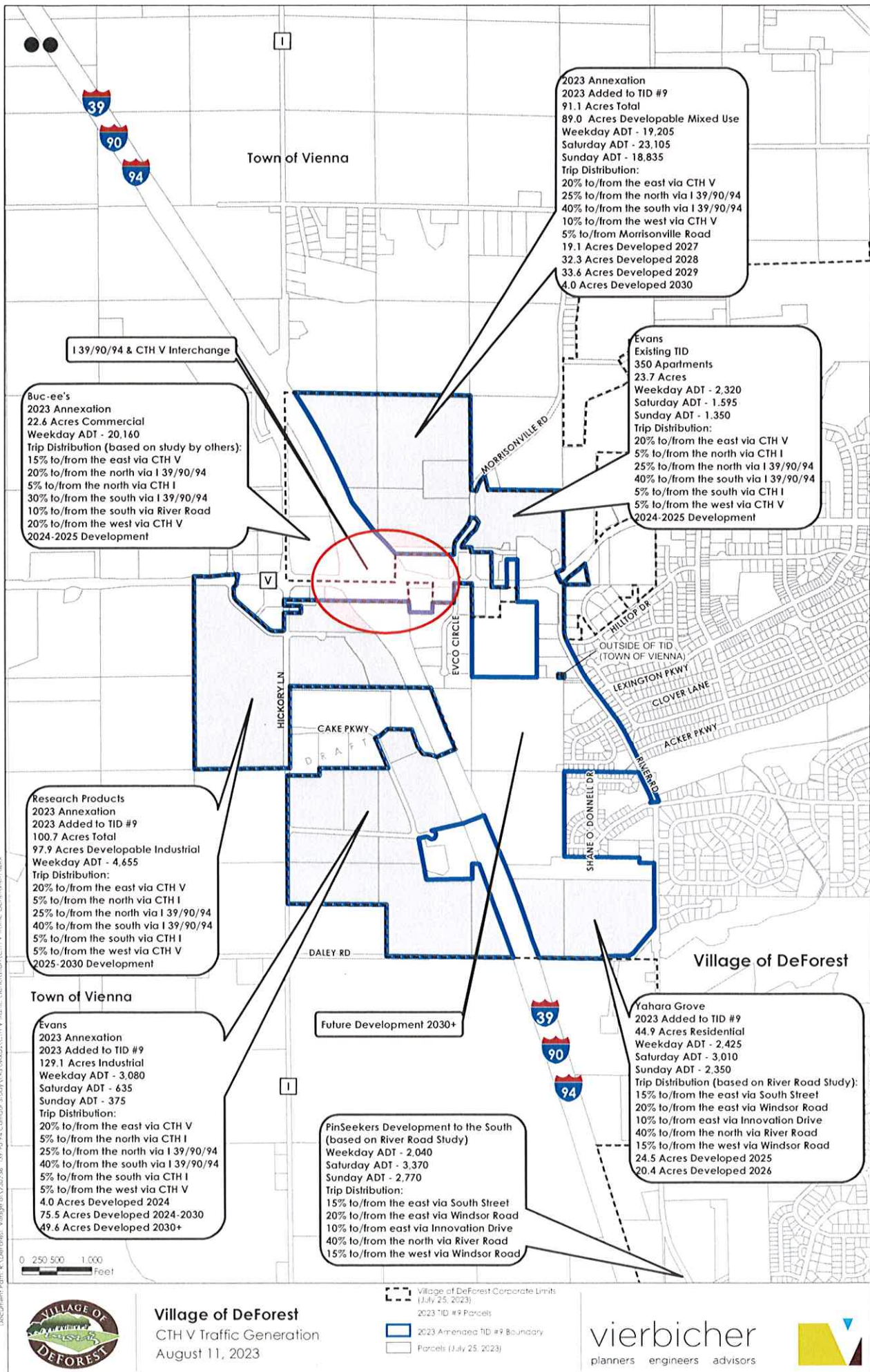


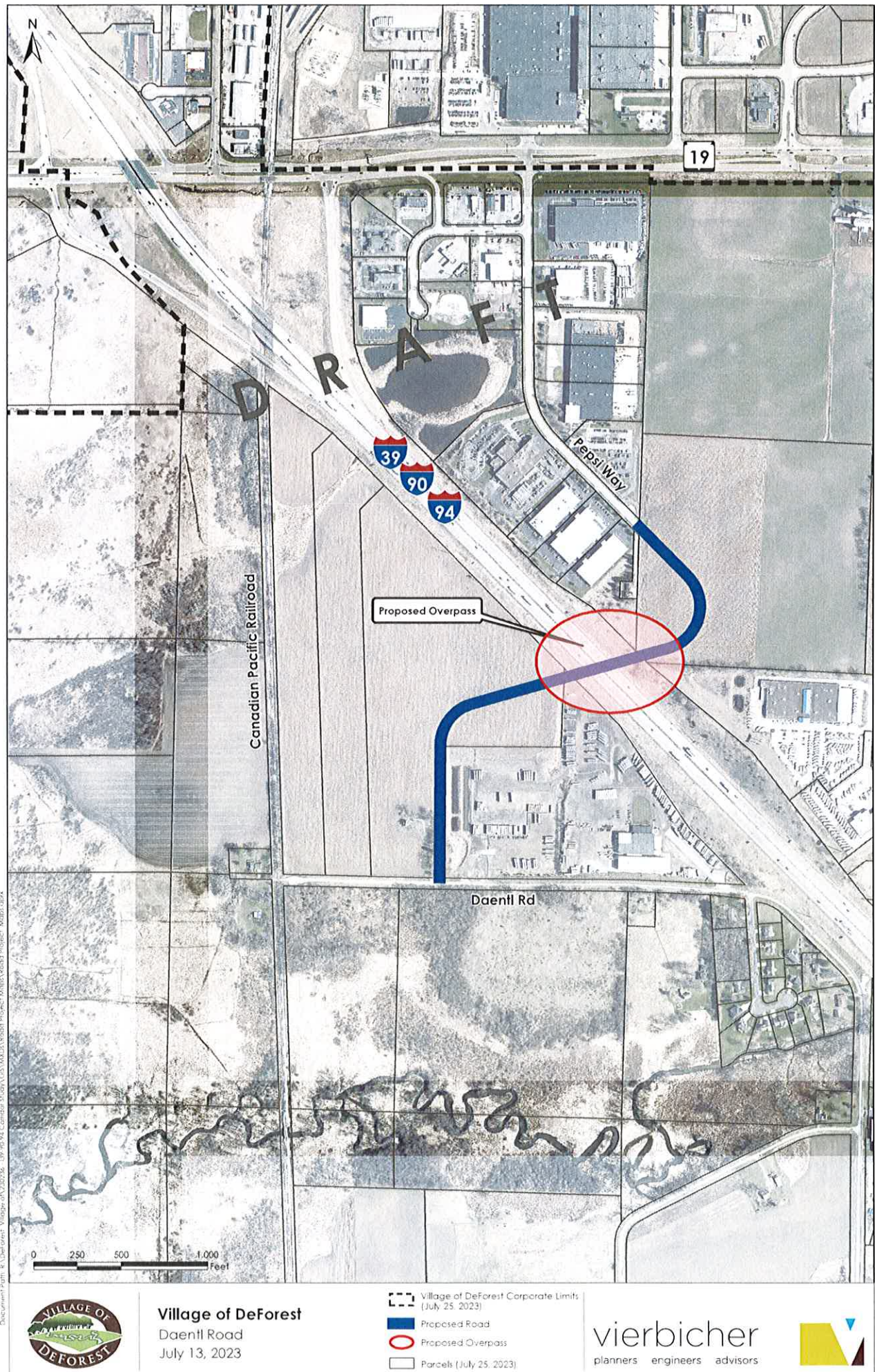
- Alternative #3:
U-Ramp w/ WIS 19
Over Railroad
- Reduces signalized intersections from four to two by moving NB on ramp to a u-ramp and NB off ramp to align with County CV
 - Elevates WIS 19 over railroad & I-39/90/94
 - Adds WIS 19 capacity (3 lanes each direction)
 - Commercial relocation at WIS 19 and County CV

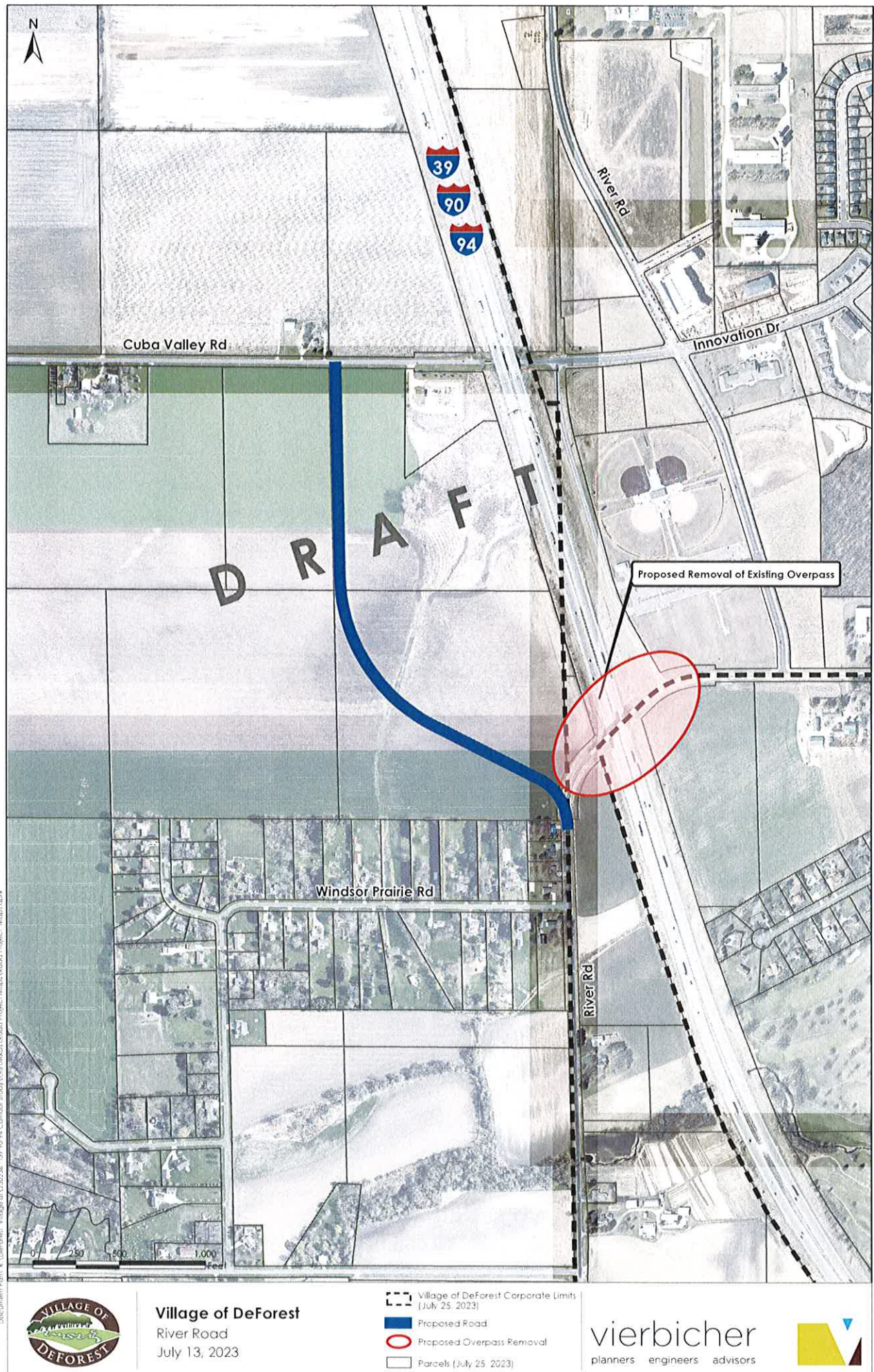


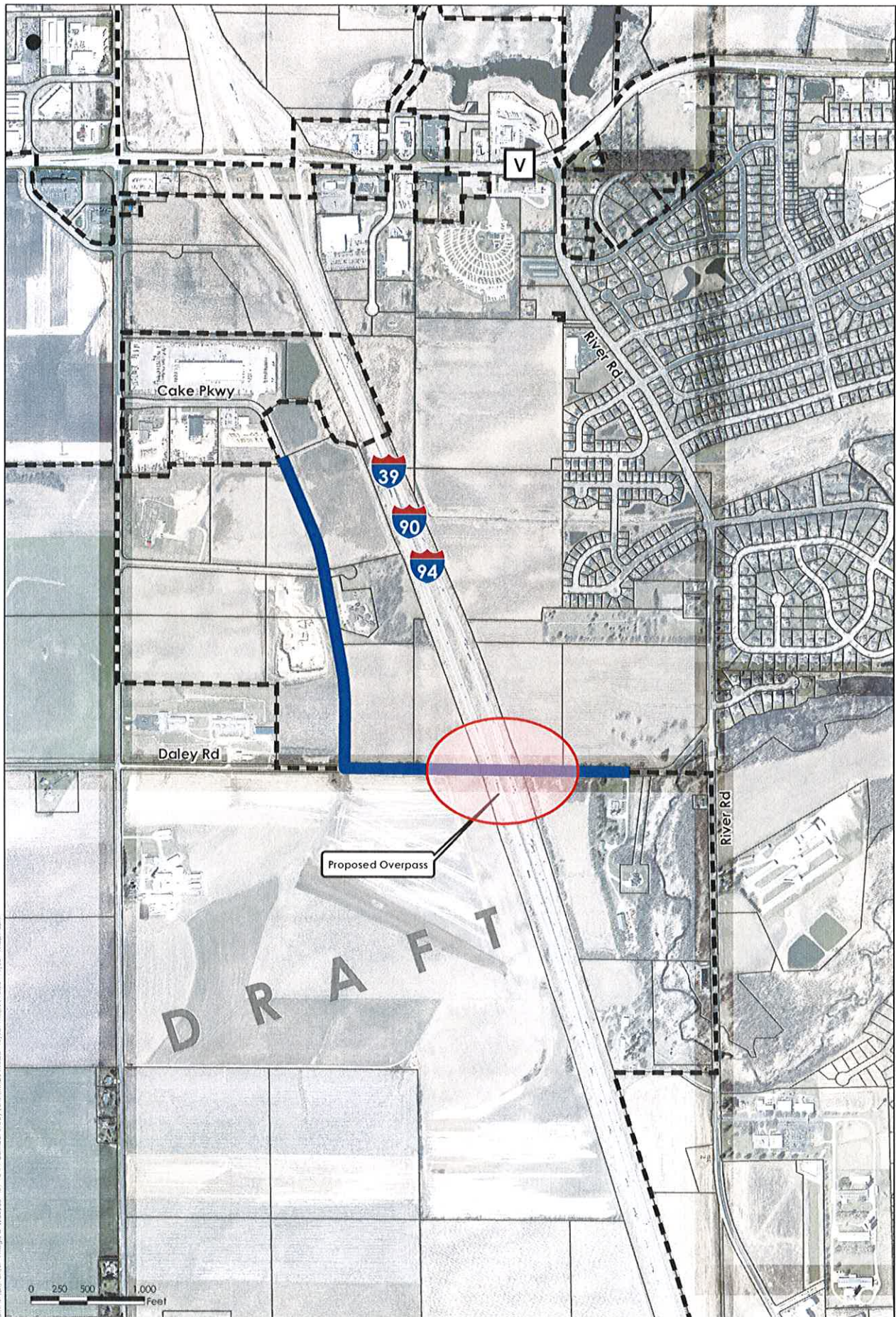
- Alternative #2:**
- Diverging Diamond Interchange**
- Reconstructs the County V interchange as a diverging diamond interchange (DDI)
 - DDI would:
 - Provide free-flow left turns to entrance ramps
 - Reduce traffic delays
 - Provide better safety
 - Increases ramp lengths
 - Would need to construct at least one new bridge over I-39/90/94











Document Path: \\s:\projects\181\DeForest\181-DeForest-Village of DeForest Study\GIS\MapDocs\Road Project\MapDocs\MapDocs.mxd



Village of DeForest
Daley Road
July 13, 2023

- Village of DeForest Corporate Limits (July 25, 2023)
- Proposed Road
- Proposed Overpass
- Parcels (July 25, 2023)

vierbicher
planners engineers advisors





VILLAGE OF DEFOREST

120 S STEVENSON STREET
 DEFOREST, WI 53532
 PHONE (608) 846-6751
 WWW.VI.DEFOREST.WI.US

Wisconsin Department of Transportation
 Southwest Region Office
 2101 Wright Street
 Madison, WI 53704

Dear Jennifer Kobryn,

The Village of DeForest has reviewed Wisconsin Department of Transportation's ("WisDOT") preferred alternative plans for proposed improvements to the Interstates 39/90/94 adjacent to and through the Village of DeForest. We thank you for the opportunity to respond.

Overall, we agree with WisDOT plans to improve this major transportation corridor which link many communities together and is a conduit to the state of Wisconsin's robust business and tourism economy. There are different impacts at each of the Village of DeForest's exit points that have led us to the following recommendations. Each will be discussed starting with the southernmost portion of the interstate that bisects DeForest and moving north.

- 1) While Highway 51 Alternate 2 is our preferred plan, after your presentation to the Village Board on December 5, 2023, we understand the rationale for WisDOT's preferred partial cloverleaf. From a cost perspective as well as movement of traffic this seems like a viable solution. We strongly request the intersection at E. Metro Dr. and Williamsburg Way be improved with signalization of this highly hazardous intersection. The Village has taken great strides in working on internal networks of roads to facilitate local traffic. We anticipate the final piece of this internal network will be completed in the near future as development occurs on the lands east and west of Highway 51 and south of Highway 19. We continue our request that WisDOT consider a bike or pedestrian trail along the eastern side of Highway 51.
- 2) After consideration, we agree WIS 19 U-ramp is the least costly, shortest construction impact and has the least impact to local business. Additional multi-family and commercial business development is planned for the west side of I 39/90/94. This area is contained within a tax increment district, and we expect to see it fully built out before 2036. We feel that alternative number 5 with a diverged east-west Highway 19 ramp will mitigate the railroad impacts. We still would like to see a multi-use trail along the northside of Highway 19 to provide for the connection of pedestrian and bicycle traffic from both sides of the interstate.
- 3) The Highway V interchange has a proposal from Buc-ee's to improve the area with a diverging diamond interchange. This area is the latest to see an increase in demand for growth. The Village has recently annexed over 300 acres in this area and is in the process of amending the tax increment district to include a majority of the annexed lands.
- 4) Other considerations:

- Daentl Road interstate crossing via bridge. We feel this is an important safety component to serve the area. This area currently is only one way in and out, having this crossing enhances safety and overall traffic flow once the area is developed out. We would like to see from WisDOT a cost estimate and proposed timeline for the bridge construction and what the cost share might be, including a draft copy of a cost share agreement for such a project.
- Daley Road was bisected by the interstate many years ago. With the increased development pressure to the west side (as stated above for the Highway V interchange), reconnecting this road with an overpass will lessen the local traffic on Highway V and provide for better traffic circulation. We understand your desire to see how the area will work as development builds and agree that this can be postponed until a later date. To the extent that we can, we would like to preserve funding opportunities through the interstate project in the case it is determined that a bridge is warranted.
- River Road bridge over the interstate could be either removed or raised to mitigate the conflict that bridge seems to encounter. The Village will continue to show the extension of River Road to the north and connect into Cuba Valley Road as a place holder for future growth and private development.
- We also support the expanded travel lane over a flex lane for the interstate along the Village of DeForest. This will provide a safe and efficient corridor as well as cost less over time than a flex lane. We also support the fact that this will not affect our popular athletic complex.

We thank you for taking your time to involve and consider the Village of DeForest's needs as one of the fastest growing communities in Dane County.

Sincerely,


 Bill Chang
 Village of DeForest Administrator

From: [Pritzlaff, Frank J - DOT](#)
To: [Schaefer, William](#)
Cc: [Hoesly, Colleen](#); [Caron Kloser](#); [Taylor, Brian F - DOT](#); [Colleen Harris](#); [Schave, Daniel L - DOT](#)
Subject: RE: Interstate Study
Date: Tuesday, January 24, 2023 2:19:08 PM
Attachments: [image003.png](#)

Thanks much Bill and congratulations on your upcoming retirement!

[Frank J. Pritzlaff, P.E.](#)

WisDOT - Southwest Region

Project Manager

Major Studies/PDS

frank.pritzlaff@dot.wi.gov

(O) 608-246-5443

(M) 608-419-4520



From: Schaefer, William <WSchaefer@cityofmadison.com>
Sent: Tuesday, January 24, 2023 2:07 PM
To: Pritzlaff, Frank J - DOT <Frank.Pritzlaff@dot.wi.gov>
Cc: Hoesly, Colleen <CHoesly@cityofmadison.com>
Subject: Interstate Study

**CAUTION: This email originated from outside the organization.
Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Frank,

I had the invitation to become a participating agency for the Interstate Study on our January 4, 2023 MPO Board meeting agenda. As appropriate and expected, the board approved accepting the invitation. Sorry for the delay in getting back to you on this. Colleen Hoesly from our staff, whom I've copied, is the main contact person for now. I am retiring soon. When a new manager is hired, we will notify you about adding him/her as a contact. Thank you.

Bill Schaefer (he/him)

PLANNING MANAGER

ph: (608) 266-9115

email: wschaefer@cityofmadison.com

GreaterMadisonMPO.org

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Greater Madison MPO 2024 Resolution No. 7
MPO Comments on WisDOT's I-39/90/94 Project Concurrence Point 2- Recommended Preferred Alternative

WHEREAS, the Greater Madison MPO is the designated Metropolitan Planning Organization for the Madison, Wisconsin Metropolitan Area with responsibilities to perform regional transportation planning and programming, in cooperation with the Wisconsin Department of Transportation and Metro Transit, the major transit operator; and

WHEREAS, one of the primary responsibilities of the MPO is to prepare and approve a long-range regional transportation plan in accordance with the Infrastructure Investment & Jobs Act (IIJA), also known as the Bipartisan Infrastructure Bill (23 U.S.C. 104, 134) and implementing U.S. Department of Transportation (DOT) regulations (23 C.F.R. 450); and

WHEREAS, the regional transportation plan is a multi-modal transportation systems plan that defines the goals for the region and specifies policies, projects, and recommendations to help achieve these goals, and also includes the updated Congestion Management Process; and

WHEREAS, the regional transportation plan is intended to guide implementing agencies in development of projects and implementation of other recommendations and supporting actions to guide improvements for all modes of transportation; and

WHEREAS, the Wisconsin Department of Transportation (WisDOT) is undertaking a study of Interstate 39/90/94 from the Beltline to US Highway 12/Wisconsin Highway 16 in Wisconsin Dells; and

WHEREAS, the study corridor includes a nearly 15 mile stretch of Interstate running through the Greater Madison MPO's Planning Area; and

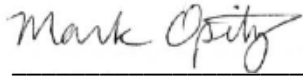
WHEREAS, WisDOT has asked for Concurrence from Participating Agencies on Concurrence Point 2, Identification of the Recommended Preferred Alternative

NOW, THEREFORE, BE IT RESOLVED that the Greater Madison MPO:

1. Remains neutral with the recommendation for the I-39/90/94 freeway of the modernization plus added general purpose lane. While an added general purpose lane on the Interstate is not inconsistent with the MPO's *Connect Greater Madison 2050 Regional Transportation Plan*, concerns still remain with induced demand and community impacts.
2. Concurs with the recommendation at the I-94/WIS 30 (Badger) Interchange of the Full Modernization Alternative #2.
3. Concurs with the recommendation at the US 151/High Crossing Blvd Interchange of the Directional Alternative.
4. Concurs with the recommendation at the US 51 interchange of the Partial Cloverleaf.
5. Concurs with the recommendation at the WIS 19 Interchange of the U-Ramp.
6. Concurs with the recommendation at the Milwaukee St interchange of the Partial Cloverleaf interchange.
7. Concurs with the recommendation at the Hoepker Road Interchange of the Shifted Diamond interchange.

BE IT FURTHER RESOLVED that the Greater Madison MPO makes the following additional comments:

1. Supports Madison's identified priority bike and pedestrian connections.
2. Supports DeForest's requested bike and pedestrian connections.
3. Strongly encourages noise mitigation.
4. Strongly encourages travel demand management (TDM) and transportation system management operations (TSMO) strategies be included as mitigation strategies, including during project construction.



Mark Opitz, Board Chair
Greater Madison MPO

May 1st, 2024

Date Adopted

CITY OF WISCONSIN DELLS
RESOLUTION NO. 5486

BE IT HEREBY RESOLVED by the City of Wisconsin Dells, that based upon the recommendation of the Public Works Committee from their July 10, 2023 meeting;

IT RECOMMENDS alternative #1 (Diamond with realigned CTH H) to State Highway 13 Interchange (Exit 87) & alternative #1 (Split diamond) to State Highway 12/16 Interchange (Exit 85) for the reconstruction of Interstate 90/94.


Edward E. Wojnicz, Mayor

Attest:


Sarah L. Brown, City Clerk/Treasurer

Vote: 5 ayes; 0 nays; 0 abs

Date Introduced: July 17, 2023

Date Passed: July 17, 2023

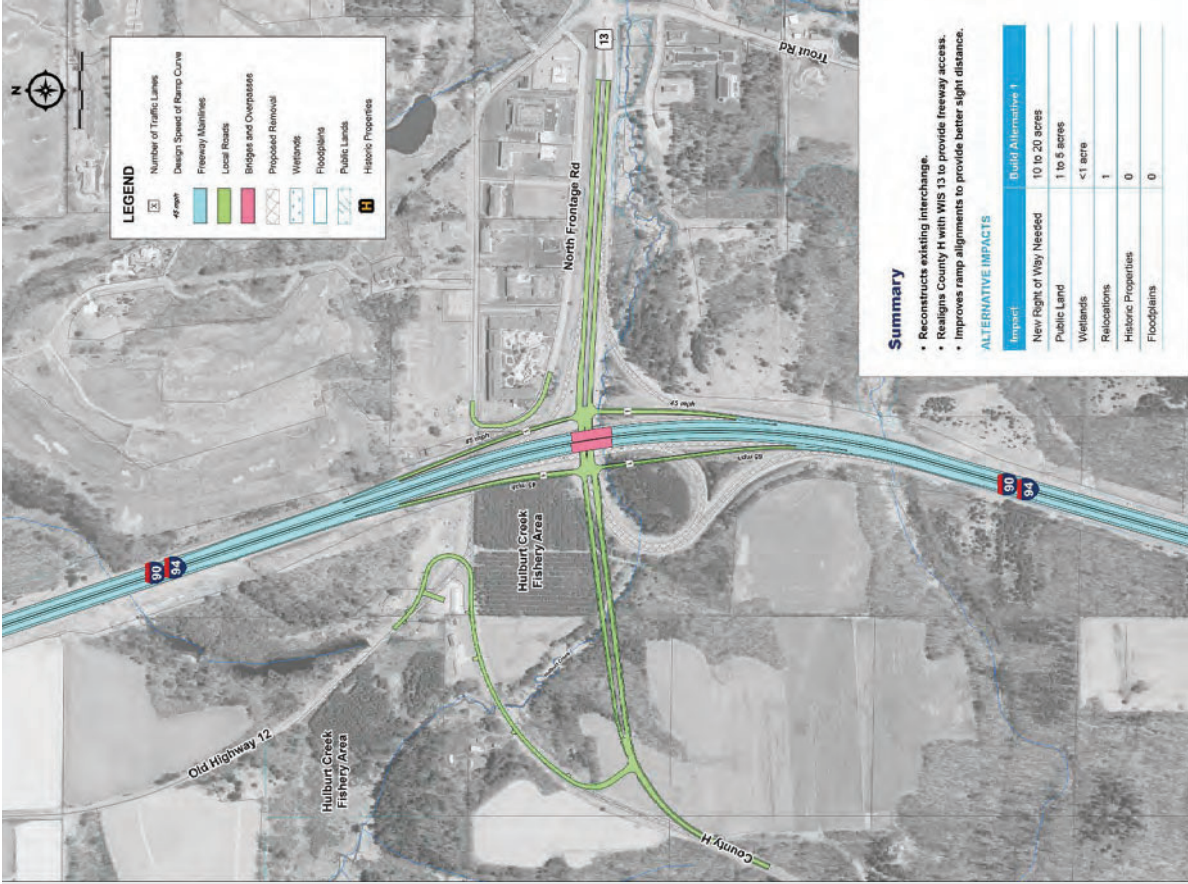
Date Published: July 27, 2023



WIS 13 Interchange

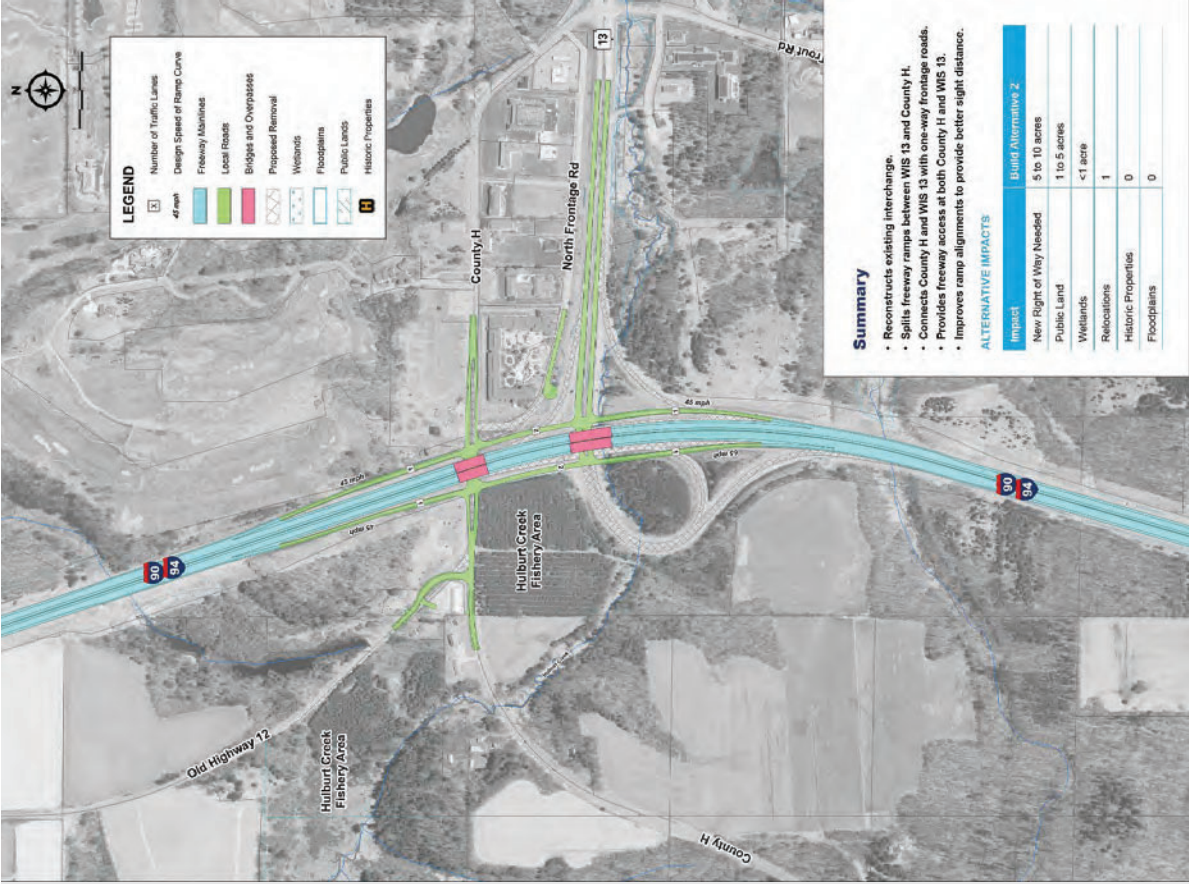
Alternative #1:
Diamond w/ Realigned CTH H

- Desire by local officials to better connect County H to the WIS 13 interchange
- Realign County H to intersect WIS 13 at newly designed diamond IC
- Would impact Hulburt Creek Fishery Area, but would also free up area where current trumpet interchange is located
- No Interstate crossing at existing County H location
- One relocation of out-building of Polynesian Hotel (both alts)



**Alternative #2:
Split Diamond**

- Desire by local officials to better connect County H to the WIS 13 interchange
- Keeps County H in current alignment, but connects County H with WIS 13 using frontage roads on either side of Interstate
- NB on & SB off would be to County H while NB off & SB on would be to WIS 13
- Less impactful real estate needs
- Still frees up real estate where current trumpet interchange is located
- One relocation of out-building of Polynesian Hotel (both alts)

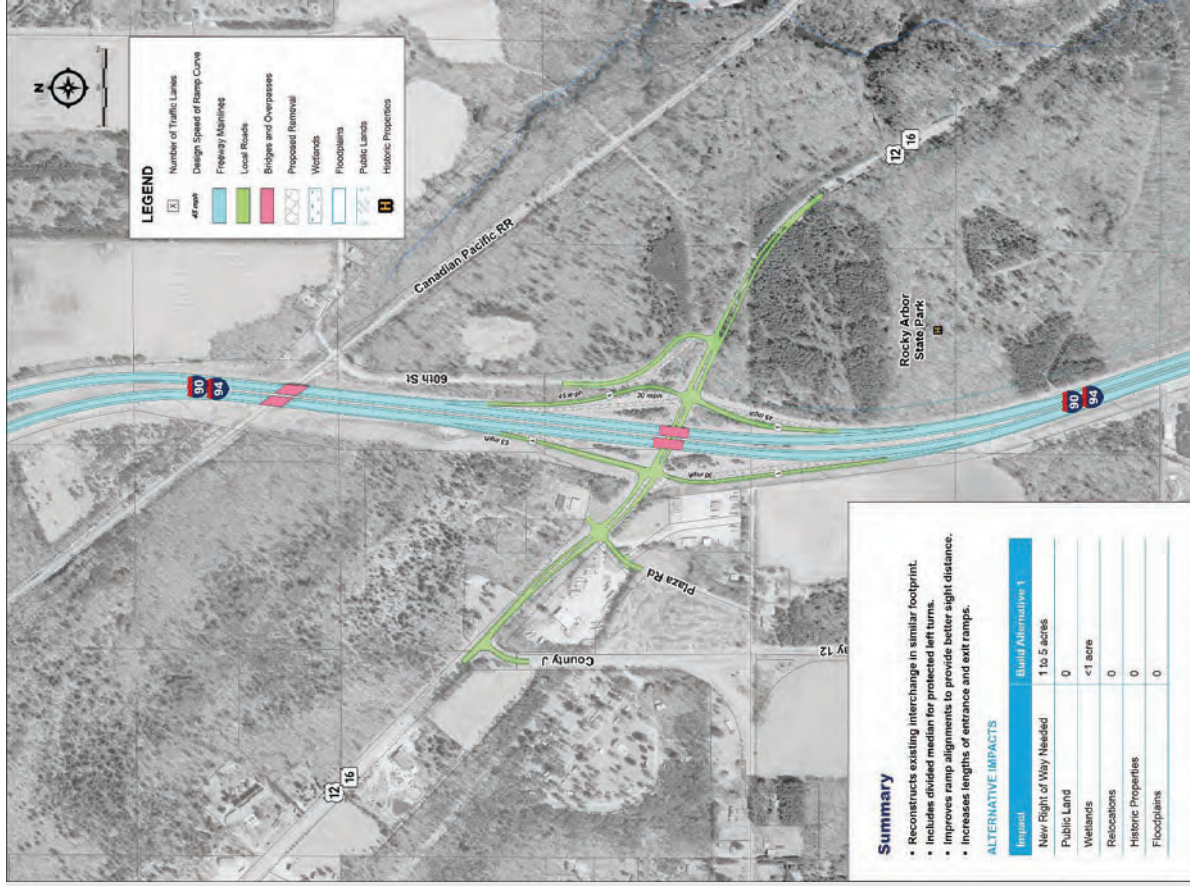




US 12/WIS 16 Interchange

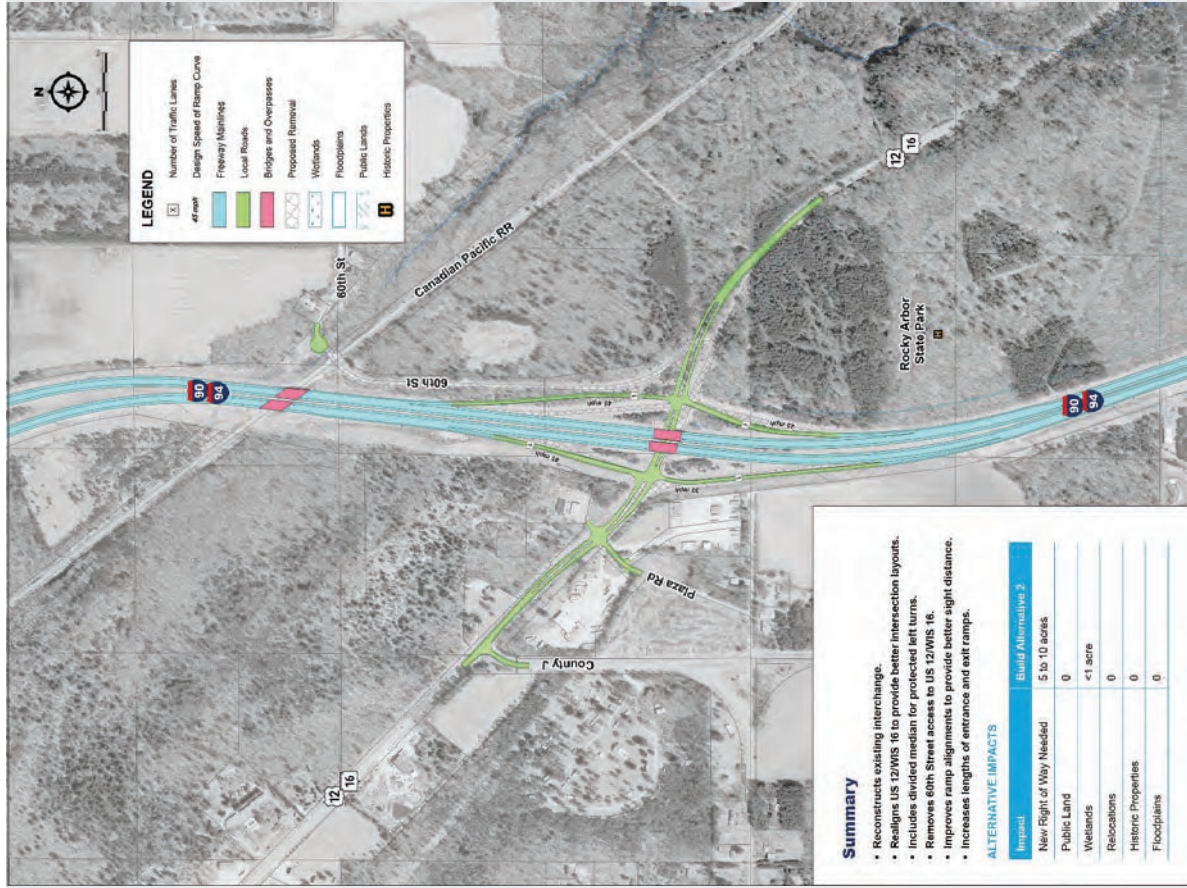
Alternative #1: Diamond

- Both US 12/WIS 16 interchange alternatives are diamond ICs
- This alternative would reconstruct in a similar footprint to the existing interchange
- Divided median provided for protected left turns
- Ramp alignments would be improved to provide better sight distance
- Ramps would be lengthened to provide a greater distance to get up to speed



Alternative #2: **Realigned Diamond**

- This alternative would realign US 12/WIS 16 to provide a less skewed interchange
- Similar to Alternative #1:
 - Divided median provided for protected left turns
 - Ramp alignments would be improved to provide better sight distance
 - Ramps would be lengthened to provide a greater distance to get up to speed
- Would remove access for 60th Street at US 12/WIS 16
 - Poor feedback to date
 - Likely won't move forward



RESOLUTION No. 23-014

RESOLUTION SUPPORTING THE I-39/90/94 CORRIDOR STUDY

WHEREAS, the Wisconsin Department of Transportation (WisDOT) and the Federal Highway Administration (FHWA) are conducting the I-39/90/94 Corridor Study between US 12/18 in Madison and US 12/WIS 16 in Wisconsin Dells; and

WHEREAS, the purpose of the I-39/90/94 Corridor Study is to address existing and future traffic demands, safety issues, aging and outdated infrastructure; and

WHEREAS, WisDOT will identify project needs and evaluate a range of alternatives in an environmental impact statement (EIS). The EIS process, which will include ongoing opportunities for public involvement, will lead to the identification of a preferred alternative; and

WHEREAS, the Village of Lake Delton and Wisconsin Dells has a significant impact on Wisconsin's economy due to increasing visitors resulting in Sauk County becoming the second highest county behind only Milwaukee in Direct Visitor Spending of \$1.6 billion in 2022 according to the Wisconsin Department of Tourism; and

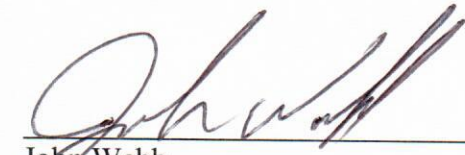
WHEREAS, over 5 million annual visitors to the Wisconsin Dells primarily entering the community via the I-39/90/94 Corridor and is vital to the growth of this significant segment of the local and Wisconsin economies.

NOW THEREFORE, BE IT RESOLVED: The Village Board of the Village of Lake Delton supports the modernization plus added general purpose lanes US 151 through the I-39 Split to US 12/WIS 16.

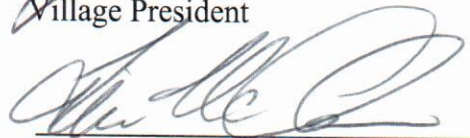
BE IT FURTHER RESOLVED: That the Village Board of the Village of Lake Delton supports the improvement of traffic flows with the Alternative 1: Diverging Diamond Interchanges at the Lake Delton US 12 Interchange and the Lake Delton WIS 23 Interchange.

PASSED AND ADOPTED by the Village Board of the Village of Lake Delton this 14th day of August 2023.

ATTEST:



John Webb
Village President



Tim McCumber
Administrator-Clerk-Treasurer



Office of the Mayor

Satya Rhodes-Conway, Mayor
City-County Building, Room 403
210 Martin Luther King, Jr. Blvd.
Madison, WI 53703
Phone: (608) 266-4611 | Fax: (608) 267-8671
mayor@cityofmadison.com
cityofmadison.com

July 28, 2023

Dan Schave
Colleen Harris
WisDOT SW Region
2101 Wright St
Madison WI 53704

Re: WisDOT I-39/90/94 Corridor Study Preliminary Alternatives

Attached please find staff comments and recommendations regarding alternatives the I-39/90/94 Corridor Study project. They have been endorsed by Madison's Plan Commission and Transportation Commission. I support these recommendations and want to highlight key objectives for the City, which include:

- Moderating speeds on East Washington Ave to increase safety, especially for vulnerable users
- Supporting a human scale, urban land use pattern and encouraging transit oriented redevelopment
- Supporting existing businesses by providing safer access and more visibility
- Providing the opportunity for new interstate access at both Milwaukee Street and Hoepker Road, which would unlock significant development potential in the city and support some of our largest employers
- Mitigating noise levels that could increase with changes to the freeway mainline and interchanges

Overall, the City wants to prioritize creating vibrant places that are welcoming to and created for people (as opposed to vehicles). We look forward to continuing our partnership with the Department as you move through the environmental documentation process.

Sincerely,

Satya Rhodes-Conway
Mayor
Madison, Wisconsin

Cc: Secretary Craig Thompson



Department of Transportation

Thomas Lynch, PE, PTOE, PTP, AICP, Director of Transportation

Madison Municipal Building
215 Martin Luther King Jr Blvd
Suite 109
P.O. Box 2986
Madison, Wisconsin 53701-2986
Phone: (608) 266-4761
Fax: (608) 267-1158

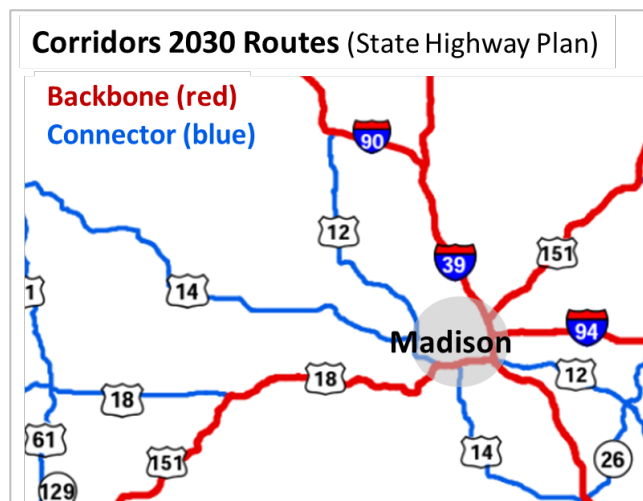
Subject: WisDOT Interstate Study Staff Review w/ Transportation and Plan Commission Comments

Date: July 5, 2023, Revised July 28, 2023

The Wisconsin Department of Transportation (WisDOT) is studying the reconstruction of the Interstate from Madison to Wisconsin Dells, with eventual construction beginning in 2027 that could span a decade. Key objectives for WisDOT will likely include preserving mobility and improving safety on their “Backbone Routes,” shown in the adjacent figure. This also may include providing “system” or freeflow ramps at the Backbone interchanges of I-39-90/I-94 (Badger) and I-90-94/US 151.

The study and subsequent project provides several opportunities for local mobility in the Madison area. This includes:

- An ability to rearrange the US 151 and I-39-90-94 interchange in a way that reduces speeds on East Washington Avenue and provides an urban street connection to the American Center.
- A new Interstate interchange at Hoepker Road, which would provide additional freeway access into the American Center.
- A new interchange at a Milwaukee Street extension with I-94. This interchange is planned in the Sprecher Neighborhood Development Plan and Comprehensive Plan.



This memo provides observations and staff recommendations for this WisDOT study that affects Madison.

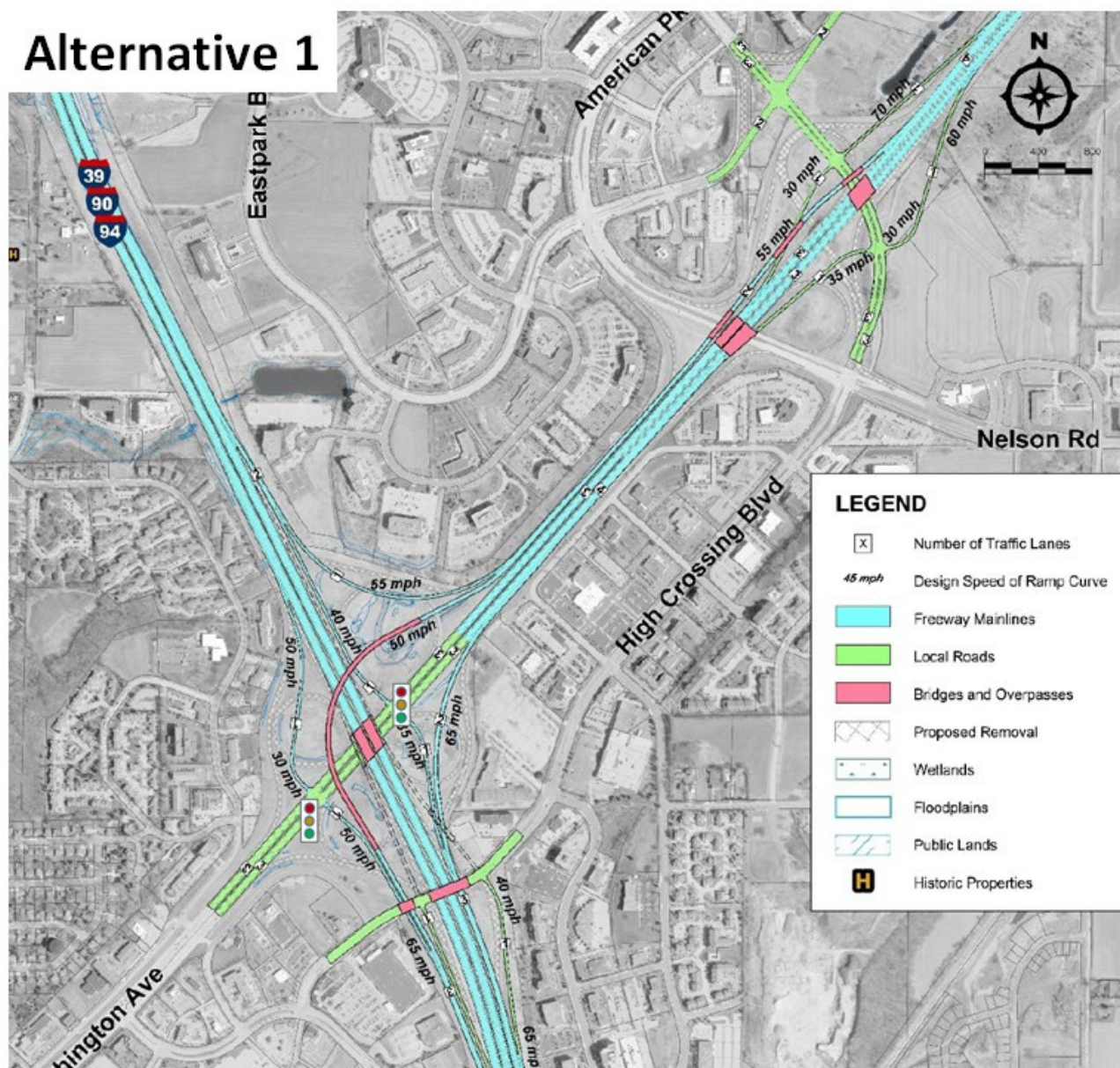
US 151/Interstate Interchange

WisDOT developed five alternatives that generally accomplish their objective of providing system (freeflow) ramps at backbone to backbone connections. The alternatives have many features that can achieve local objectives. Pertinent local objectives include:

1. **Slowing speeds on East Washington Ave.** East Washington Ave is on the City’s High Injury Network, and experienced five pedestrian/bicycle fatalities in 2021. Speed is a primary contributor to fatalities and serious injuries on East Washington. Speed is a concern just west of the interchange where the US 151 freeway transitions to a street, and partial cloverleaf ramps join East Washington Ave. with posted street speeds of between 40 to 55 mph. Alternatives that extend an urban East Washington Ave with signals will help reduce speeds.
2. **Providing an Urban Connection to the American Center.** It is very difficult to access the American Center without using a freeway and it is almost impossible by bike. Providing an urban street connection to the American Center helps connect it to the whole of Madison.
3. **Reducing noise impacts to surrounding properties.** Generally, ramps that are not elevated have less potential to propagate highway noise.

4. **Enhance density/development opportunities.** Madison's area for expansion is finite, and efficient, interconnected land development is a goal of the City's Comprehensive Plan.
5. **Complement Bus Rapid Transit Service** – In this area BRT routing splits between servicing Sun Prairie and servicing the American Center/Hanson Road. Some alternatives enhance BRT connectivity and/or routing.
6. **Generally address entrance concepts contained in the Rattman Neighborhood Development plan.** This plan generally showed an additional connection into the American Center – most probably occurring through an extension of High Crossing to American Parkway. To provide acceptable ramp-to-ramp distances, WisDOT has modified and/or relocated the American Center entrance on several of the alternatives.

Staff Review of US 151/Interstate Alternatives

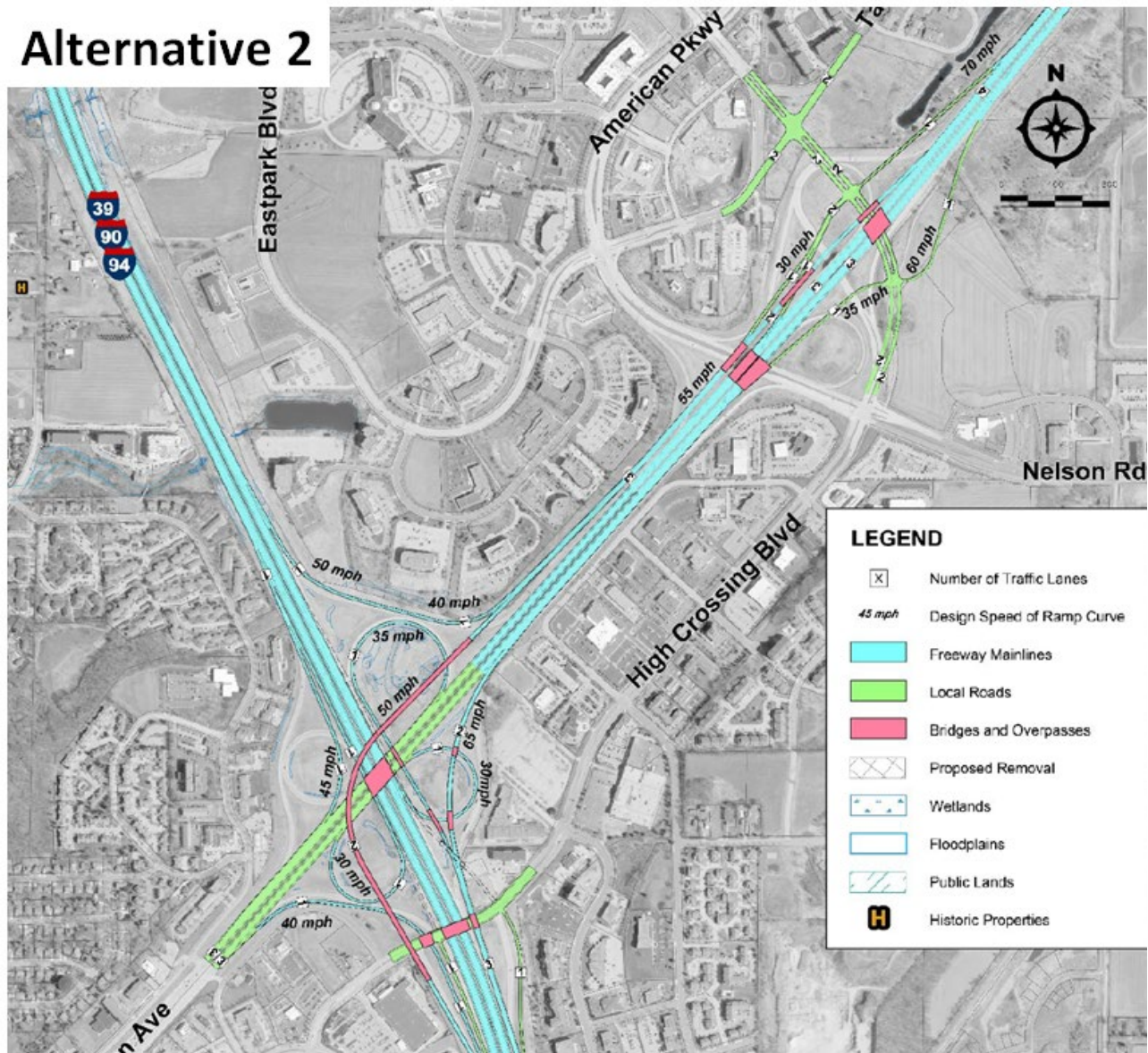


Alternative 1 provides freeflow system ramps for the US 151/Interstate connection. The connection to East Washington Avenue is served with a more traditional diamond interchange with signalized ramp terminals (as opposed to the current cloverleaf interchange). It also relocates the American Center main entrance from American Parkway to American Family Drive.

Alternative 1 Summary of Impacts

1. The signals on the East Washington Ramp terminals would help introduce an urban roadway with slower speeds.
2. There is no urban street connection to the American center with this alternative. Access without a motor vehicle remains difficult.
3. There is one elevated freeflow ramp, which could increase noise impacts.
4. This alternative would not influence density or development opportunities.
5. This alternative would not enhance BRT routing to the American Center.
6. This alternative relocates the US 151 entrance of the American Center from American Parkway to American Family Drive, yet maintains the Nelson Road/American Pkwy entrance from High Crossing Blvd.

Alternative 2

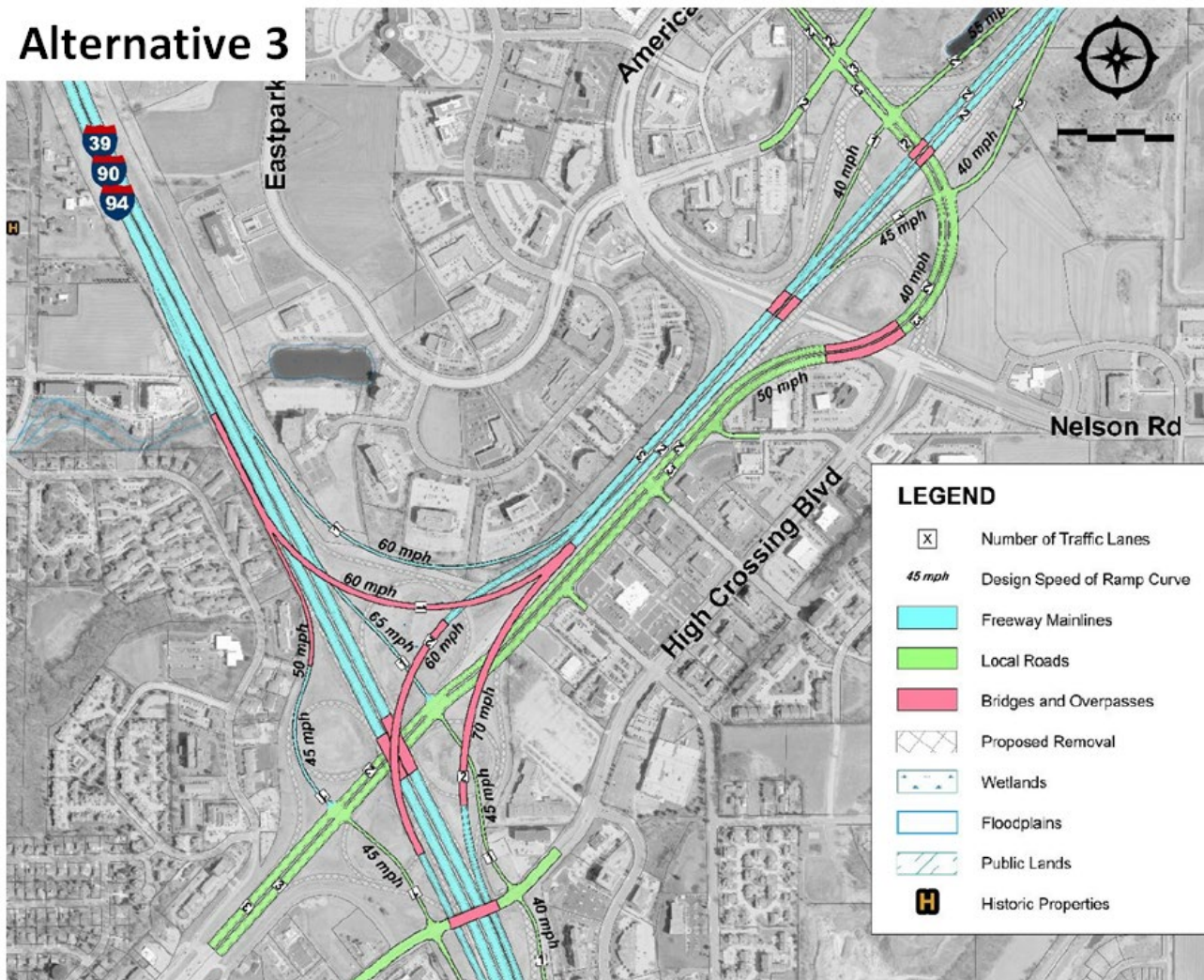


Alternative 2 provides freeflow ramps for the US 151/Interstate movements. East Washington Ave continues to be served by the cloverleaf interchange ramps (without signals). It also relocates the American Center main entrance from American Parkway to American Family drive.

Alternative 2 Summary of Impacts

1. The cloverleaf ramps remain, and East Washington speeds would remain high.
2. There is no urban street connection to the American Center with this alternative. Access without a motor vehicle remains difficult.
3. There is one elevated freeflow ramp, which could increase noise impacts.
4. This alternative would not influence density or development opportunities.
5. This alternative would not enhance BRT routing to the American Center.
6. This alternative relocates the US 151 entrance of the American Center from American Parkway to American Family Drive, yet maintains the Nelson Road/American Pkwy entrance from High Crossing Blvd.

Alternative 3

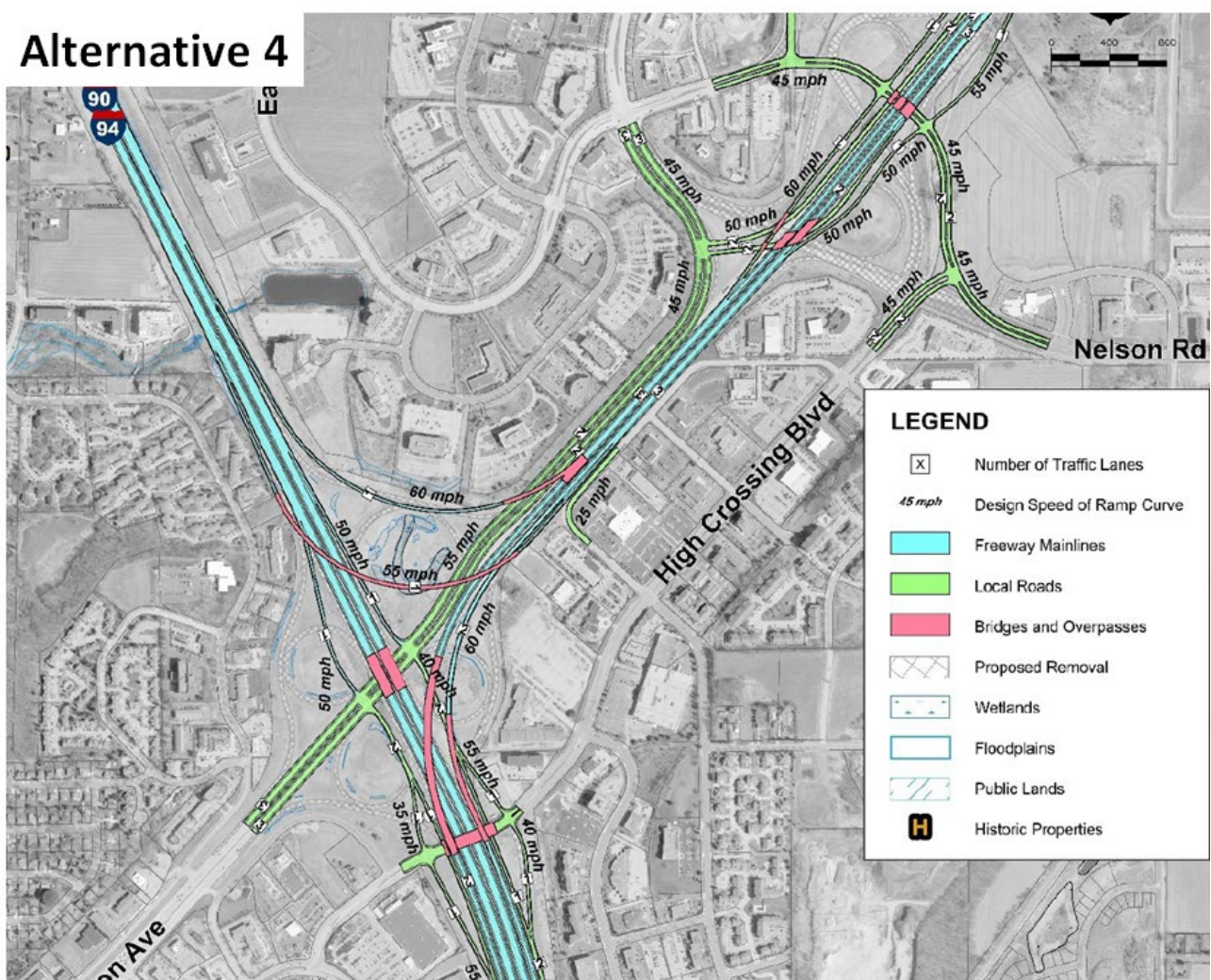


Alternative 3 provides freeflow ramps for the US 151/Interstate movements, including the SW 151 to NW Interstate movement. East Washington Ave would be served through a split diamond interchange with High Crossing Blvd, with signals. It provides a direct urban street connection to the American Center through an extension of East Washington Avenue on top of Wayne Terrace, southeast of the US 151 freeway. It also relocates the American Center main entrance from American Parkway to American Family drive. With this alternative, traffic traveling from Sun Prairie to East Washington Ave would exit on American Family Drive.

Alternative 3 Summary of Impacts

1. The signals on the East Washington Ramp terminals would help introduce an urban roadway with slower speeds. Additionally, the extension of East Washington Ave as an urban street with intersections would help to slow travel speeds east of the Interstate.

2. There is an urban street connection to the American Center with this alternative, which provides direct access for cyclists, pedestrians, and auto users who do not want use the freeway. This helps connect the American Center with the rest of the city. The urban street runs adjacent to the freeway, which could be less comfortable for some users.
3. There are three elevated freeflow ramps, which would increase noise impacts.
4. This alternative could enhance density or development opportunities. The extension of East Washington Ave along Wayne Terrace provides better access and visibility to the High Crossing area. This could create higher and better (denser) uses for the properties between Wayne Terrace and High Crossing.
5. This alternative probably would not affect BRT routing to the American Center. BRT probably would continue on High Crossing to serve the residential areas south.
6. This alternative relocates the US 151 main entrance of the American Center from American Parkway to American Family Drive through a diamond interchange. Access to American Parkway is maintained through High Crossing Blvd.

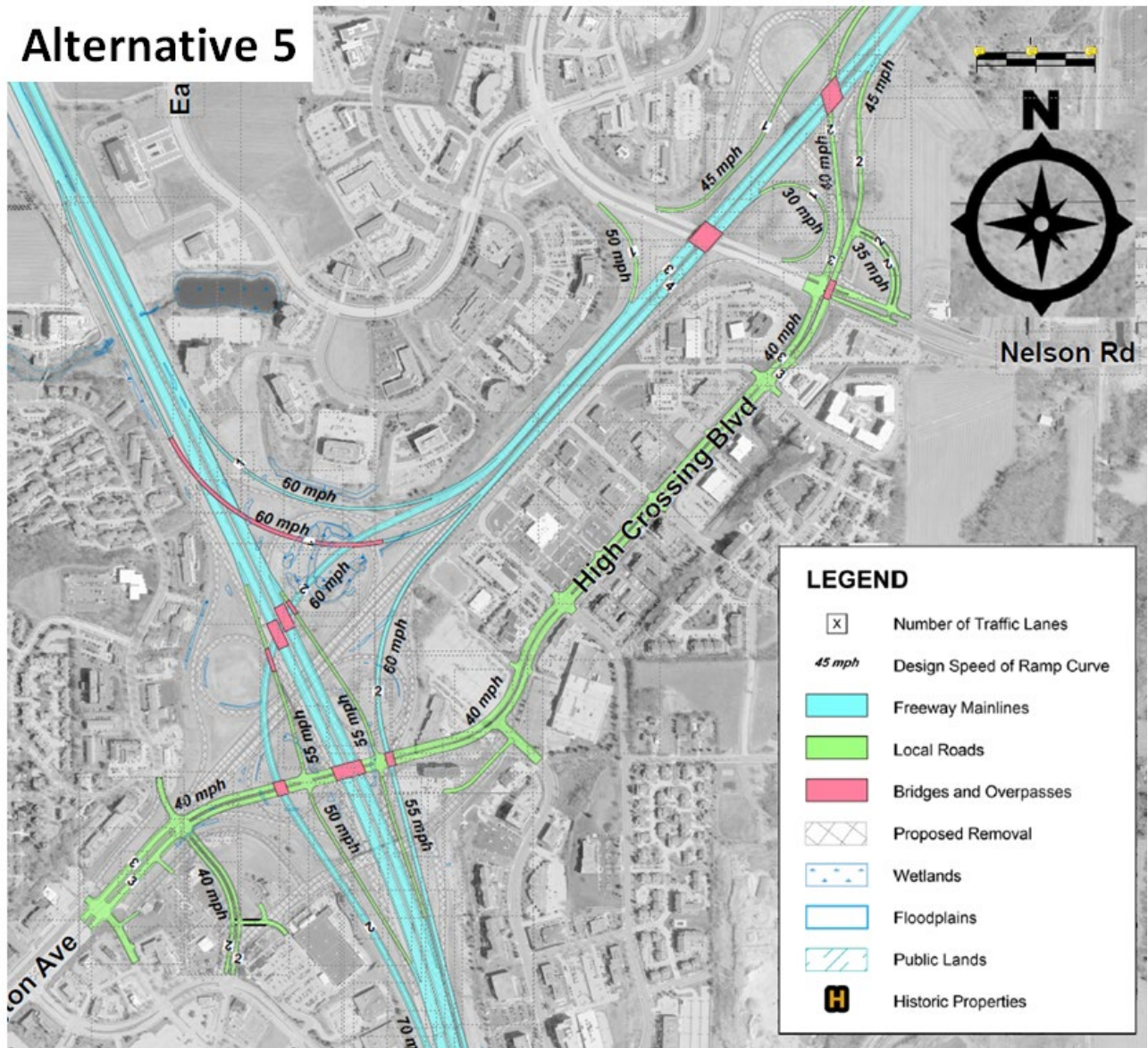


Alternative 4 is similar to Alternative 3 in that it provides freeflow ramps for the US 151/Interstate movements, including the SW 151 to NW Interstate movement and provides a direct urban connection to the American Center. However, the urban street is on the north side of the US 151 freeway and does not connect with any side roads. As with Alternative 3, East Washington Ave is served through a split diamond interchange with High Crossing Blvd, with signals. Alternative 4 does not relocate the American Center main entrance, but does realign Nelson Road to connect with Eastpark Blvd. With this alternative, traffic traveling from Sun Prairie to East Washington Ave would exit on Nelson Road.

Alternative 4 Summary of Impacts

1. The signals on the East Washington Ramp terminals would help introduce an urban roadway with slower speeds. However, the East Washington Ave extension would not provide as much speed moderation because there are no intersections or property accesses. This section of roadway would encourage higher than normal travel speeds.
2. The urban street connection to the American Center provides direct access for cyclists, pedestrians, and drivers who do not want use the freeway. Speeds on the East Washington Ave extension are a concern.
3. There are three elevated freeflow ramps, which would increase noise impacts.
4. This alternative would not enhance density or development opportunities. There is no property access or street intersections off of the extension, therefore the street would serve mainly as a local connection.
7. This alternative probably would have no effect on BRT routing to the American Center. BRT probably would continue on High Crossing to serve the residential areas south.
8. This alternative creates an addition US 151 entrance to the American Center through a modified diamond interchange connection of Nelson Road with Eastpark Blvd. It also provides an option for US 151 travelers to connect directly with the American Parkway/East Washington Ave extension.

Alternative 5



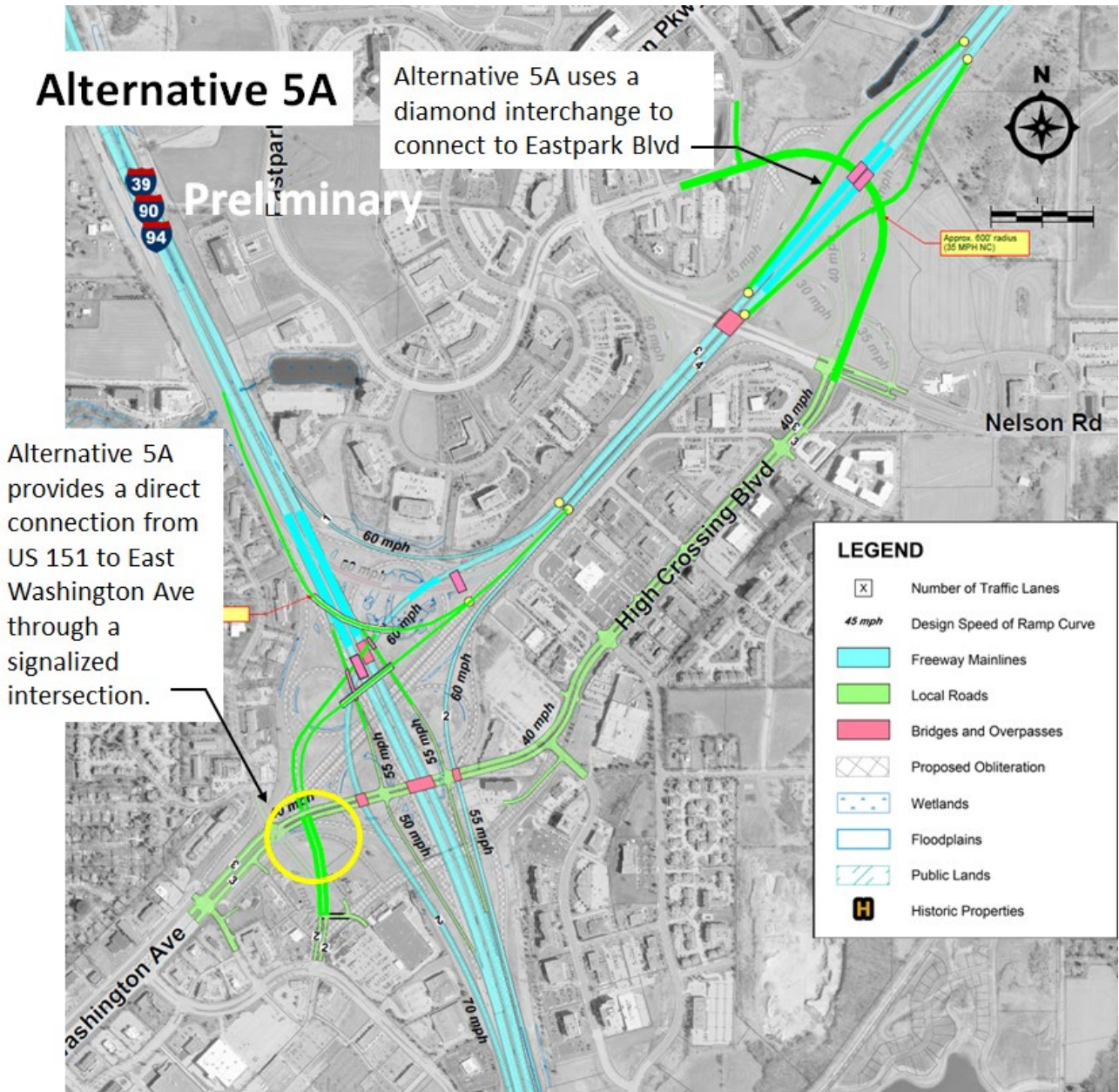
Alternative 5 provides freeflow ramps for the US 151/Interstate movements, including the SW 151 to NW Interstate movement. However, two of the freeflowing ramps are at ground level, and only one is elevated. East Washington Ave. is extended and transitions into High Crossing Blvd before it joins US 151 east of Nelson Road. East Washington Ave/High Crossing would be served through a traditional diamond interchange. Northbound High Crossing joins Nelson Road with a jug handle intersection. The current entrance to the American Center is maintained from both US 151 and local streets (High Crossing Blvd., Nelson Road). With this alternative, traffic traveling from Sun Prairie to East Washington Ave would exit on Nelson Road.

Alternative 5 Summary of Impacts

1. The signals on the East Washington Ramp terminals would help introduce an urban roadway with slower speeds. Additionally, East Washington Ave as an urban street with intersections is extended northeast to Nelson Road/American Family Drive. The use of High Crossing Blvd as an urban street would also help to slow travel speeds, introducing city speeds a full mile east of the Interstate.
2. The urban street connection to the American Center provides direct access for cyclists, pedestrians, and drivers who do not want use the freeway, better connecting the American Center with the rest of the city.
3. There is only one elevated freeflow ramp, and two depressed freeflow ramps. The elevated ramp would increase noise levels, however the two depressed ramps would have lower noise impacts than Alternatives 3 and 4.
4. This alternative would enhance density or development opportunities. High Crossing Blvd is underutilized and has high redevelopment potential. The extension of East Washington Ave onto High Crossing Blvd would provide better access and visibility.
5. This alternative would enhance BRT routing to the American Center. Combining East Washington with High Crossing Blvd eliminates turns and provide a more direct connection to both the American Center and the Sun Prairie Park and Ride.
6. This alternative maintains the current main entrance of the American Center from American Parkway to American Family Drive through a jug handle similar to the current access. An additional access into the American Center is not provided.

Note: WisDOT is proposing expanding High Crossing Blvd. to three lanes in each direction with this alternative. With High Crossing Blvd. currently seeing approximately 15,000-18,000 average weekday traffic, which is low for a road of its size, Staff has encouraged WisDOT to examine traffic projections to see if this alternative requires an expansion of High Crossing Blvd. Similarly, staff has requested further information from WisDOT as to whether the jug handle shown at Nelson Road is needed.

Alternative 5A is a modification to Alternative 5 developed to address some of the traffic diversion effects of Alternatives 3, 4, and 5. By introducing an urban roadway sooner, Alternatives 3, 4 and 5 remove roughly 20,000 to 30,000 vpd from East Washington Avenue and divert this volume to I-39/90/94 and Highway 30. Removing traffic volumes from East Washington Ave could lead to less impactful East Washington/Stoughton Road alternatives from WisDOT's North Stoughton Road study. However, WisDOT may experience challenges in accommodating the diverted traffic on the Interstate and Highway 30.



As with Alternative 5, Alternative 5A provides freeflow ramps for the US 151/Interstate movements, including the SW 151 to NW Interstate movement. Two of the freeflowing ramps are at ground level, and only one is elevated. East Washington Ave. is extended and transitions into High Crossing Blvd before it joins US 151 east of Nelson Road. However, US 151 traffic destined to Central Madison would have the option to connect directly with East Washington Ave. through a signalized intersection. East Washington Ave/High Crossing would be served through a traditional diamond interchange.

Alternative 5A relocates the American Center main entrance to a traditional diamond interchange formed by extending High Crossing Blvd and connecting it to Eastpark Blvd.

Alternative 5A Summary of Impacts

1. The signals on the East Washington Ramp terminals would help introduce an urban roadway with slower speeds. Additionally, East Washington Ave as an urban street with intersections is extended northeast to Nelson Road/American Family Drive. The use of High Crossing Blvd as an urban street would also help to slow travel speeds, introducing city speeds a full mile east of the Interstate.

2. The urban street connection to the American Center provides direct access for cyclists, pedestrians, and drivers who do not want use the freeway, better connecting the American Center with the rest of the city.
3. There is one elevated freeflow ramp, one elevated extension of US 151 to East Washington Ave., and two depressed freeflow ramps. The elevated ramp and US 151 extension would increase noise levels.
4. This alternative would enhance density or development opportunities. High Crossing Blvd is underutilized and has high redevelopment potential. The extension of East Washington Ave onto High Crossing Blvd would provide better access and visibility.
5. This alternative would enhance BRT routing to the American Center. Combining East Washington with High Crossing Blvd eliminates turns and provide a more direct connection to both the American Center and the Sun Prairie Park and Ride.
6. This alternative adds/relocates the main US 151 entrance of the American Center through a diamond interchange with an extension of High Crossing Blvd to Eastpark Blvd. American Parkway still serves as an entrance to the American Center through High Crossing Blvd.

US 151/Interstate Alternative Summary

Objective	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Alt 5A
1. Lower EW Speeds						
2. Urban Connection						
3. Noise/Elevated Ramps						
4. Development/Density						
5. Complement BRT Service						
6. American Center access configuration						

Generally, Alternative 5 accomplishes the greatest number of city objectives and therefore is favored by staff. It provides an urban connection to the American Center by routing East Washington on an underutilized road, and provides opportunity for greater development and density. The number of overhead freeflow ramps is also reduced. One added benefit is the reduction to East Washington Ave volumes prompted by this alternative.

If the diversion impacts are too great with Alternative 5, Alternative 5A satisfies many of the objectives, yet does not have the benefits of reducing traffic volumes on East Washington Ave. If Alternative 5A is selected, many features of Alternative 5 should be preserved, such as:

- An urban connection to East Washington Ave that slows traffic.
- All ages and abilities pedestrian and bicycle connections from East Washington Ave to High Crossing.

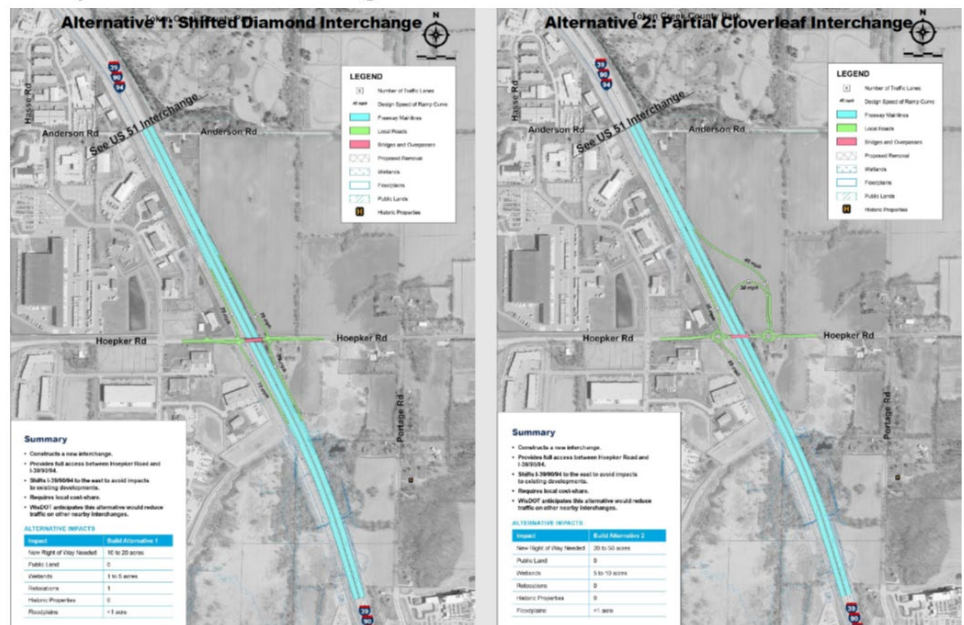
Alternative 3 satisfies some city objectives, and is a reasonable alternative.

Hoepker Interchange

Reconstruction of the Interstate provides the opportunity to evaluate the installation of a new interchange at Hoepker Road. Stakeholders in the American Center have advocated for the installation of a new interchange at Hoepker Road. This interchange is not in the current Pumpkin Hollow Neighborhood Development Plan. It would provide more direct interstate access to employment and regional medical facilities in the American Center. It also would provide access to Sun Prairie's Prairie Lakes retail center via Hoepker Road.

The configuration of a potential interchange, either a standard diamond or partial cloverleaf, will largely be determined by WisDOT traffic modeling.

Hoepker Road Interchange Alternatives



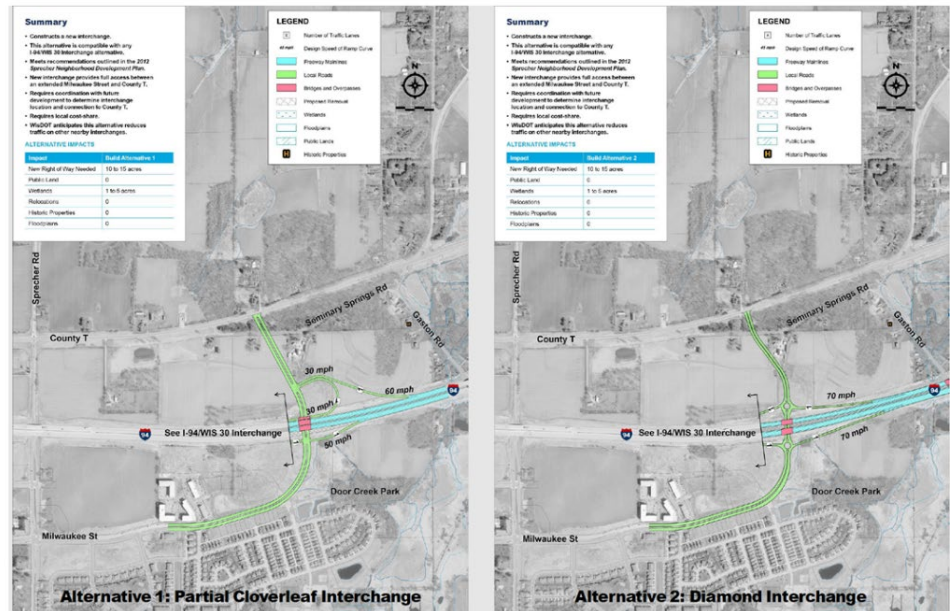
Preliminary Travel Demand Modeling was provided by WisDOT for the 2050 forecast year. If the US 151 Alternative 5 interchange is used as a base, the 2050 modeling indicates that Portage Road south of Hoepker Rd. would see roughly 2000 more vehicles per day (vpd), bringing the total to roughly 4000 vpd. The total daily volume is still well within the capacity of a typical two-lane roadway. Hoepker Road would see greater traffic volume increases, with up to 10,000 vpd being added to Hoepker Road east of the interstate. This would bring Hoepker Road traffic volumes to 20,000 vpd or above, perhaps affecting the capacity need on Hoepker Rd.

The City of Madison would be responsible for paying a local cost share associated with interchange construction. Madison has a policy that passes that cost onto benefiting properties through assessments/impact fees. This policy could be revised to include other funding sources. The Neighborhood Development Plan would also need to be modified to reflect land use changes that could occur with a new interchange.

Milwaukee Street Interchange

The I-94 reconstruction also provides an opportunity to construct an interchange off an extension of Milwaukee Street. This interchange has been part of the Sprecher Neighborhood Development Plan for two decades, and is necessary for the commercial/ employment uses in the Neighborhood Development Plan and Comprehensive Plan to be realized. The Milwaukee St interchange could enable a commercial/ employment/ mixed-use node similar to highway frontage projects like Arbor Gate (by Todd Drive) or the “City Center West” area southwest of the Beltline/Old Sauk Road interchange (TDS/Johnson Bank, Deco mixed-use building, etc).

Milwaukee Street Interchange Alternatives



The type of interchange, partial cloverleaf or conventional diamond, will largely be determined by WisDOT traffic modeling.

WisDOT provided preliminary Travel Demand Modeling for the 2050 forecast year. If the US 151 Alternative 5 is used as a base, there would be very modest changes to traffic in the area. Milwaukee St west of Sprecher would see a 10 to 15 percent increase of daily traffic volume. Sprecher Rd south of Milwaukee St. would see less than a 5 percent increase in traffic volume.

An interchange at this location provides new access opportunities for residents in the Sprecher neighborhood, as well as enhancing emergency response times from nearby Fire Station No. 13. With an interchange planned in the Sprecher Neighborhood Development Plan, Milwaukee Street has generally been constructed to accommodate additional traffic in this area. The Common Council adopted a resolution supporting study of a Milwaukee Street interchange in 2017 (see [Legistar #48640](#)).

As with the Hoepker Road interchange, the City of Madison would be responsible for paying a local cost share associated with the interchange. Madison has a policy that passes that cost onto benefiting properties through assessments/impact fees. This policy could be revised to include other funding sources, which for this area could include Tax Increment Financing (TIF)¹.

This is probably the only opportunity in the coming decades to install this interchange. If the city were to decide not to install it, the Neighborhood Development Plan and Comprehensive Plan should be modified to reflect no access to the Interstate system, which would likely mean multifamily residential replacing planned employment.

¹ Note that this would require a change in the assessment policy

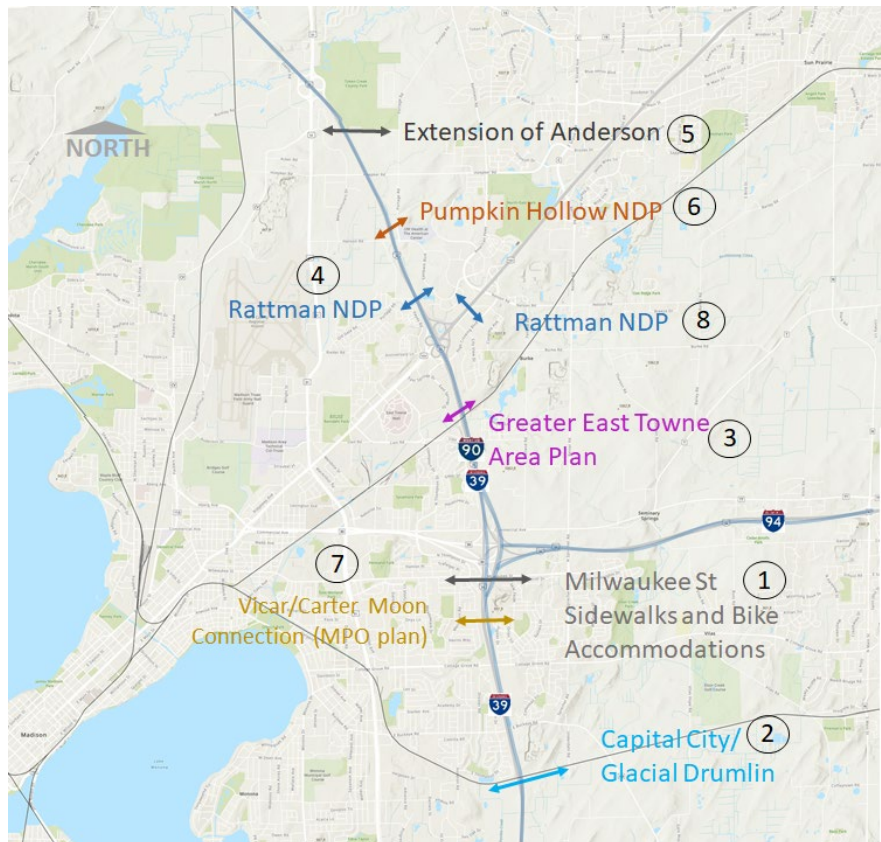
Interstate Mainline Expansion Alternatives

The Interstate facility is under state jurisdiction, and WisDOT has and will favor their objectives for the facility. It is well documented that capacity expansion leads to greater vehicle miles travel with the associated environmental and land use effects. Consequently, Madison favors no capacity expansion. If capacity expansion is incorporated into the preferred alternative, staff recommends advocating for limited measures, such as managed lanes, rather than traditional lane addition.

In all capacity expansion alternatives, staff requests that WisDOT revise its noise policy FDM Chapter 23 (associated with 23 CFR 772.7), which uses a “feasible and reasonable” criteria for noise walls. Many Type 1 highway projects have noise impacts, and noise mitigation is feasible. Yet this policy defines “reasonable” as costing less than \$50,000 per receptor, which often results in noise mitigation not being provided. This places an undue burden for reasonableness in mitigating legitimate noise impacts. For example, with the Beltline Flex Lane project there were over 100 receptors with an impact (66 dbA or greater), yet none of the noise walls investigated satisfied the “reasonable” criteria to warrant noise mitigation walls. If it is reasonable to invest hundreds of millions to expand capacity, the “reasonability” criteria should be adjusted to allow noise mitigation.

Pedestrian and Bicycle Connections

The Interstate forms a barrier between central Madison and its growth areas to the east. The reconstruction of the interstate provides a once in a 40 year opportunity to include crossings that would help ameliorate the barrier the Interstate poses. Most of the neighborhood development plans and area plans recommend pedestrian/bicycle crossings of the Interstate. For some of these connections, the need is high because the Interstate severs existing development. Other connections are not as urgent in that they will serve development planned in the future. Generally, all Interstate crossings for motor vehicles should also provide all ages and abilities bicycle and pedestrian accommodations. For dedicated pedestrian bicycle crossings, the following map indicates requested crossings, and their order of importance. Milwaukee Street, while a motor vehicle crossing, is shown as the first priority because it is of critical importance. The Milwaukee Street bridge has no pedestrian facilities, yet pedestrian volumes are increasing substantially.



Comments from Madison's Plan Commission and Transportation Commission²

The following bullets summarize and paraphrase comments made by Madison's Plan Commission at their meeting on July 10 and the Transportation Commission at their meeting on July 12, 2023

Plan Commission

- Generally commission members supported staff recommendations.

Transportation Commission

- Generally commission members supported staff recommendations
- Many commission members supported providing a more urban connection to the American Center.
- The District 15 Alder supported the connection between Milwaukee and County T associated with the Milwaukee Street interchange.
- One person testified about the difficulty biking on High Crossing Road. Commissioners testified that High Crossing Road should be appropriately sized and the expansion to 6-lanes may not be necessary..
- A couple of commission members expressed concern over increased capacity on the interstate and how that increases Vehicle Miles Traveled.
- An overall summary comment was that any change should not further divide the community.

² Appointed by the Mayor and confirmed by the council. See MGO 33.56 and 28.204



City of Madison

City of Madison
Madison, WI 53703
www.cityofmadison.com

Master

File Number: 81632

File ID: 81632

File Type: Resolution

Status: Passed

Version: 1

Reference:

Controlling Body: TRANSPORTATION COMMISSION

File Created Date : 01/17/2024

File Name: Endorsing and Prioritizing Improvement of Pedestrian and Bicycle Connectivity as Part of the Wisconsin Department of Transportation's I-39/90/94 Study and Reconstruction

Final Action: 02/13/2024

Title: Endorsing and Prioritizing Improvement of Pedestrian and Bicycle Connectivity as Part of the Wisconsin Department of Transportation's I-39/90/94 Study and Reconstruction

Notes:

CC Agenda Date: 01/23/2024

Sponsors: Satya V. Rhodes-Conway, Derek Field, Regina M. Vidaver, Dina Nina Martinez-Rutherford, Amani Latimer Burris And John W. Duncan

Effective Date:

Attachments: Ped-Bike Priorities Map with Network.pdf, Ped-Bike Priorities Map.pdf, Ped-Bike Priorities Summary.pdf, [public] I90 corridor and Commercial Ave crossing.pdf, [public] TC 1-30-2024 comments on multiple agenda items.pdf

Enactment Number: RES-24-00107

Author: Tom Lynch

Hearing Date:

Entered by: ALarson2@cityofmadison.com

Published Date:

Approval History

Version	Seq #	Action Date	Approver	Action	Due Date
1	1	1/17/2024	Ryan Pennington	Approve	2/6/2024

History of Legislative File

Version:	Acting Body:	Date:	Action:	Sent To:	Due Date:	Return Date:	Result:
1	Transportation Department	01/17/2024	Referred for Introduction				
	Action Text: This Resolution was Referred for Introduction						
1	COMMON COUNCIL	01/23/2024	Refer	TRANSPORTATION COMMISSION		01/31/2024	Pass
	Action Text: A motion was made by Currie, seconded by Figueroa Cole, to Refer to the TRANSPORTATION COMMISSION. The motion passed by voice vote/other.						

1	TRANSPORTATION COMMISSION	01/23/2024	Refer	PLAN COMMISSION	02/05/2024	
	Action Text: This Resolution was Refer to the PLAN COMMISSION					
1	TRANSPORTATION COMMISSION	01/31/2024	RECOMMEND TO COUNCIL TO ADOPT - REPORT OF OFFICER			Pass
	Action Text: McCahill moved to RECOMMEND TO COUNCIL TO ADOPT - REPORT OF OFFICER, seconded by Martinez-Rutherford. The motion passed by voice vote/other.					
1	PLAN COMMISSION	02/05/2024	Return to Lead with the Recommendation for Approval	TRANSPORTATI ON COMMISSION		Pass
	Action Text: A motion was made by Mendez, seconded by Spencer, to Return to Lead with the Recommendation for Approval to the TRANSPORTATION COMMISSION. The motion passed by voice vote/other.					
1	COMMON COUNCIL	02/13/2024	Adopt			Pass
	Action Text: A motion was made by Currie, seconded by Figueroa Cole, to Adopt. The motion passed by voice vote/other.					

Text of Legislative File 81632

Fiscal Note

City share of new cross-Interstate/USH 151 pedestrian/bicycle connections would be subject to WisDOT's cost share policy and would involve future annual capital budget.

Title

Endorsing and Prioritizing Improvement of Pedestrian and Bicycle Connectivity as Part of the Wisconsin Department of Transportation's I-39/90/94 Study and Reconstruction

Body

WHEREAS, the Wisconsin Department of Transportation (WisDOT) is undertaking a study of Interstate 39/90/94 from the Beltline to US Highway 12/Wisconsin Highway 16 in Wisconsin Dells; and

WHEREAS, the study corridor includes a nearly 10 mile stretch of Interstate running through the City of Madison; and

WHEREAS, the City of Madison is the largest municipality within the fastest growing region in the State, with the City of Madison Comprehensive Plan projecting that the city will add 115,000 new residents between 2020 and 2050; and

WHEREAS, the Interstate corridor running through the City of Madison has either already urbanized or is expected to urbanize in the coming decades as the city continues to grow; and

WHEREAS, the City's Comprehensive Plan, updated in December 2023, has goals, strategies, and actions that call for compact, interconnected growth, accompanied by an expansion and improvement of the city's pedestrian and bicycle networks; and

WHEREAS, the 2017 Madison in Motion Transportation Plan similarly calls for building and maintaining comfortable and safe pedestrian and bicycle infrastructure, while the City's Complete Green Streets Guide, adopted in January 2023, prioritizes pedestrian, transit, and bicycle infrastructure above automobile infrastructure; and

WHEREAS, the Comprehensive Plan, Madison in Motion Transportation Plan, and more detailed area and neighborhood development plans along the Interstate and US Highway 151 corridor call for a series of pedestrian/bicycle crossings to reduce the substantial impediment to active transportation presented by the highways; and

WHEREAS, encouraging active transportation through a safe and convenient network of sidewalks and shared-use paths is critical to providing alternatives to driving that can help slow the increase in car traffic as the city and region continue to grow; and

WHEREAS, Interstate reconstruction is the opportune time to implement planned shared-use path and pedestrian connections across the Interstate and US Highway 151 in manner that will be far more cost-effective and less disruptive than a series of stand-alone projects; and

WHEREAS, Interstate reconstruction will cost billions of dollars and span more than a decade; and

WHEREAS, inclusion of additional pedestrian and bicycle connections across the Interstate would be a modest expenditure in the Interstate reconstruction project budget, but would represent a significant capital cost to the City of Madison; and

WHEREAS, WisDOT has asked for a prioritization of crossings, and City staff have ranked the importance of the crossings based on existing development and anticipated near-term future development.

NOW, THEREFORE, BE IT RESOLVED that the City of Madison endorses the following pedestrian/bicycle connections for inclusion in WisDOT's Interstate 39/90/94 study in the following priority of importance:

1. Comfortable "All Ages and Abilities" pedestrian and bicycle facilities on the existing Milwaukee Street crossing of the Interstate.
2. Extension of the Capital City and Glacial Drumlin State Trails under the Interstate adjacent to the state-owned railroad line south of Thompson Drive.
3. A shared-use path connection along the state-owned railroad line north of Lien Road (as shown in the Greater East Towne Area Plan).
4. A shared-use path along the north side of E. Washington Avenue and US Highway 151, a concept developed by WisDOT as part of their Interstate Study, to better connect the east and west side of the Interstate in the US 151 area.
5. A shared-use path just north of Hayes Road, connecting Portage Road with Eastpark Boulevard (as shown in the Rattman Neighborhood Development Plan).
6. An "All Ages and Abilities" pedestrian and bicycle connection at Anderson Road across the Interstate (as shown in the Hanson and Pumpkin Hollow Neighborhood Development Plans).
7. A crossing of the Interstate in the vicinity of Hoepker Road (as shown in the Pumpkin Hollow Neighborhood Development Plan).
8. A shared-use path connecting Wayne Terrace to West Terrace Drive across US Highway 151 (as shown in the Rattman and Nelson Neighborhood Development Plans).
9. A shared-use path across the Interstate in the vicinity of Vicar Lane with Carter Moon Pass (as shown in the Madison Metropolitan Planning Organization's Regional Transportation Plan 2050).

BE IT FURTHER RESOLVED, the City requests that any existing or proposed motor-vehicle crossing of the Interstate that is constructed or reconstructed include "All Ages and Abilities" pedestrian and bicycle facilities, and

BE IT FINALLY RESOLVED, the City requests that WisDOT include funding for the above pedestrian and bicycle connections in the project budget so that the negative impacts of a national transportation facility on local mobility and local transportation can be mitigated.



Department of Transportation

Thomas Lynch, PE, PTOE, PTP, AICP, Director of Transportation

Madison Municipal Building
215 Martin Luther King Jr Blvd
Suite 109
P.O. Box 2986
Madison, Wisconsin 53701-2986
Phone: (608) 266-4761
Fax: (608) 267-1158

February 13, 2023

David Schmidt, WisDOT Project Manager
WisDOT SW Region Office PDS Dane 2 Unit

Subject: I-39/90/94 Corridor Study
Concurrence Points 1 and 2

We appreciate the collaborative approach WisDOT has taken with this corridor study. While as a city we may have a different transportation philosophy, Madison staff and policy makers greatly appreciate being able to comment on draft alternatives and work with your team in developing better alternatives.

In your January 12, 2024 email your requested comments and concurrence on concurrence points 1 (Purpose and Need) and 2 (Range of Alternatives).

The City of Madison accepts WisDOT's invitation to be a participating agency.

Concurrence Point 1 – Purpose and Need

The current stated Purpose and Need for the I-39/90/94 Corridor Study is:

The purpose of the I-39/90/94 Corridor Study is to address existing and future traffic demands, safety issues, aging and outdated infrastructure and corridor resiliency.

The City of Madison suggests adding a phrase that includes reducing the barrier the freeway poses to adjacent communities. This is consistent with US DOT objectives, and achieving this part of the Purpose is currently being addressed in the alternatives WisDOT is already proposing as part of the project.

Concurrence Point 2 – Range of Alternatives

The City agrees with the interchange and crossing alternatives being brought forward and is confident in WisDOT's expertise in the screening of the geometric alternatives. The City also appreciates the inclusion of the Managed Lane Alternative in addition to the Capacity Expansion Alternative.

Based on the most recent information provided, the City supports the Hoepker Road interchange, the Milwaukee Road extension interchange, and Alternative 1 of the US 151/I-39/90/94 interchange. We ask that All Ages and Abilities pedestrian and bicycle accommodations be incorporated into all connections and interchanges being constructed.

Other General Comments

The City's philosophy (general planning document objectives) differs from WisDOT in the dismissal of the No-Capacity Expansion Alternative. The Purpose and Need is drafted in a way that limits the evaluation of non-capacity expanding alternatives. In the past 50 years, US transportation investments have focused on motor vehicle mobility while under investing in alternate modes. For example, in Wisconsin's 2023-2025 budget transit funding makes up just 3.6% of WisDOT's budget, with intercity bus and passenger rail just 0.2%¹. This focus on motor

¹ 2023 Act 19

vehicle mobility has more than doubled our VMT per person since 1960, and created traffic fatality rate per resident that is 2 to 3 times the rate of our peer countries².

Despite our differences in philosophy, we value and appreciate the collaboration WisDOT has fostered, and the listening posture WisDOT staff have established. We look forward to further partnership.

Sincerely,



Thomas W. Lynch PE PTOE PTP AICP
Director of Transportation, City of Madison

cc: Mayor Satya Rhodes-Conway
Reuben Sanon, Deputy Mayor
Jim Wolfe, City Engineer
Yang Tao, Traffic Engineering Director

² <https://data.oecd.org/transport/road-accidents.htm>



WisDOT
Southwest Regional Office
Madison Office
2101 Wright Street
Madison, WI 53704



Governor Tony Evers
Secretary Craig Thompson
wisconsindot.gov
Telephone: (608) 246-3800
FAX: (608) 246-7996
Email: swr.dtsd@dot.wi.gov

February 28, 2024

Subject: **Interstate 39/90/94 Corridor Study: Concurrence Points 1 and 2**

Hello Tom,

We received your letter about Concurrence Points 1 and 2. As a study partner, the Wisconsin Department of Transportation values your feedback on these matters.

Regarding Concurrence Point 1 (Purpose and Need), WisDOT is working with municipalities, such as the City of Madison, to improve connectivity for communities adjacent to the study corridor. We look forward to continuing that collaboration.

In reference to Concurrence Point 2 (Range of Alternatives), WisDOT notes your support for the Hoepker Road interchange, the Milwaukee Road extension interchange, and Alternative 1 of the US 151 and I-39/90/94 interchange. We also acknowledge your preference for pedestrian and bicycle accommodations for all ages and abilities to be included in the project scope. As we've discussed, these accommodations would be dependent upon a funding cost share agreement. We appreciate you providing the City of Madison's prioritized list of locations for bicycle and pedestrian accommodations. The current build alternatives provide for or do not exclude future implementation of the requested priority crossings.

WisDOT has taken an expansive approach to this Corridor Study, including analyzing the No-Capacity Expansion Alternative. Impact analysis of that alternative will be included in the Draft Environmental Impact Statement (DEIS).

As I mentioned, WisDOT values the partnership and input of the City of Madison. We look forward to continuing our collaboration.

Sincerely,

David Schmidt

David Schmidt, P.E.

I-39/90/94 Corridor Study Project Manager



Department of Transportation

Thomas Lynch, PE, PTOE, PTP, AICP, Director of Transportation

Madison Municipal Building
215 Martin Luther King Jr Blvd
Suite 109
P.O. Box 2986
Madison, Wisconsin 53701-2986
Phone: (608) 266-4761
Fax: (608) 267-1158

May 14, 2024

David Schmidt, PE

Wisconsin Department of Transportation (DTSD)
Southwest Region Madison Office
2101 Wright Street
Madison WI, 53704

Subject: I-39/90/94 Concurrence Point 2

Attached you will find resolution RES-24-00321 (legistar 82916) stating the City of Madison's concurrence and preferences regarding the preferred alternative. We greatly appreciate the collaborative approach WisDOT has taken on this study as it seeks to improve interstate travel. We also appreciate WisDOT incorporating the introduction of two interchanges into the scope of the study and environmental document.

The City of Madison concurs with all of WisDOT's recommendations within the Madison area except for capacity expansion/CD roads. Philosophically the City believes that the national focus on motor vehicle capacity expansion induces demand and increases vehicle miles traveled. Despite this difference of opinion, the City of Madison acknowledges that I-39/90/94 is under WisDOT's jurisdiction as an Interstate Highway.

The resolution references concerns regarding noise impacts because at the time of introduction the noise modeling results were not available. The WisDOT project team staff has since presented the noise modeling and proposed noise walls to City staff. The analysis and proposals were comprehensive and have allayed fears we have regarding noise impacts.

Sincerely,

A handwritten signature in red ink, appearing to read "Tom Lynch", is written over a horizontal line.

Thomas W. Lynch PE PTOE PTP AICP
Director of Transportation, City of Madison

cc:

Jenny Kobryn

Dan Schave



City of Madison

City of Madison
Madison, WI 53703
www.cityofmadison.com

Master

File Number: 82916

File ID: 82916

File Type: Resolution

Status: Passed

Version: 1

Reference:

Controlling Body: Transportation
Department

File Created Date : 04/09/2024

File Name: Responding to WisDOT's I-39/90/94 Project
Concurrence Point 2

Final Action: 05/07/2024

Title: Responding to WisDOT's I-39/90/94 Project Concurrence Point 2

Notes:

CC Agenda Date: 05/07/2024

Sponsors: Derek Field, Sabrina V. Madison And Jael Currie

Effective Date: 05/13/2024

Attachments: [public] Comments Regarding Agenda item 4.pdf,
[public] Viets.pdf, 2024-04-24 TC I-90-94.v2.pdf,
050624_CC_public_comment.pdf, File 82916 Reg
Report.pdf

Enactment Number: RES-24-00321

Author: Tom Lynch, Director of Transportation

Hearing Date:

Entered by: ALarson2@cityofmadison.com

Published Date:

Approval History

Version	Seq #	Action Date	Approver	Action	Due Date
1	1	4/10/2024	Ryan Pennington	Approve	4/29/2024

History of Legislative File

Ver- sion:	Acting Body:	Date:	Action:	Sent To:	Due Date:	Return Date:	Result:
1	Transportation Department	04/09/2024	Referred for Introduction				
	Action Text: This Resolution was Referred for Introduction						
1	COMMON COUNCIL	04/16/2024	Referred	TRANSPORTATI ON COMMISSION		04/24/2024	
	Action Text: This Resolution was Referred to the TRANSPORTATION COMMISSION						
1	TRANSPORTATION COMMISSION	04/24/2024	RECOMMEND TO COUNCIL TO ADOPT - REPORT OF OFFICER				Pass

Action Text: Director of Transportation Tom Lynch provided verbal reports and, along with Assistant City Engineer Chris Petykowski, was available for questions.

Registrants as follows: Oppose, does not wish to speak; Mike Panten, S Sprecher Rd Support, does not wish to speak; Nicholas Davies, Richard St

Vander Meulen moved to RECOMMEND TO COUNCIL TO ADOPT - REPORT OF OFFICER, seconded by Webber. The motion passed by the following roll call vote:

1	COMMON COUNCIL	05/07/2024	Adopt Unanimously	Pass
	Action Text:	A motion was made by Figueroa Cole, seconded by Duncan, to Adopt Unanimously. The motion passed by voice vote/other.		

Text of Legislative File 82916

Fiscal Note

The City's cost-share of new cross-Interstate/USH 151 pedestrian/bicycle connections would be subject to WisDOT's cost share policy and would involve future capital budgets.

Title

Responding to WisDOT's I-39/90/94 Project Concurrence Point 2

Body

WHEREAS, the Wisconsin Department of Transportation (WisDOT) is undertaking a study of Interstate 39/90/94 from the Beltline to US Highway 12/Wisconsin Highway 16 in Wisconsin Dells; and

WHEREAS, the study corridor includes a nearly 10 mile stretch of Interstate running through the City of Madison; and

WHEREAS, the City of Madison is the largest municipality within the fastest growing region in the State, with the City of Madison Comprehensive Plan projecting that the city will add 115,000 new residents between 2020 and 2050; and

WHEREAS, the Interstate corridor running through the City of Madison has either already urbanized or is expected to urbanize in the coming decades as the city continues to grow; and

WHEREAS, the City's Comprehensive Plan, updated in December 2023, has goals, strategies, and actions that call for compact, interconnected growth, accompanied by an expansion and improvement of the city's pedestrian and bicycle networks; and

WHEREAS, the Comprehensive Plan, Madison in Motion Transportation Plan, and more detailed area and neighborhood development plans along the Interstate and US Highway 151 corridor call for a series of crossings to reduce the substantial impediment to active transportation presented by the highways; and

WHEREAS, WisDOT has asked for Concurrence from Participating Agencies on Concurrence Point 2, Identification of the Recommended Preferred Alternative

NOW, THEREFORE, BE IT RESOLVED that the City of Madison:

1. Concurs with the recommendation at the I-94/WIS 30 interchange of the Full Modernization Alternative 2, with an emphasis on the importance of provide full pedestrian and bicycle accommodations with the reconstruction of the Milwaukee Street bridge over the interstate.
2. Concurs with the recommendation at the Milwaukee St interchange of the Partial Cloverleaf interchange.

3. Concurs with the recommendation at the US 151/High Crossing Blvd Interchange of the Directional Alternative, with an understanding of the installation of signals at the service interchange ramp terminals and the construction of a shared use path through the interchange to American Parkway/Nelson Rd.
4. Concurs with the recommendation at the Hoepker Road Interchange of the Shifted Diamond interchange
5. Concurs with the recommendation at the US 51 interchange of the Partial Cloverleaf.
6. Does not concur with the recommendation for the I-39/90/94 freeway of the modernization plus added general-purpose lane. The City continues to have concerns regarding induced travel demand brought on by capacity expansion and believes the Modernization Hybrid (managed lane) Alternative would have less overall travel demand impact.
7. Discourages the adding of Collector Distributor roads along the mainline. The addition of these roads effectively takes a 6 to 8 lane section of Freeway and converts it into an 12 lane section of freeway.

BE IT FURTHER RESOLVED, the City continues support pedestrian and bicycle crossings and improvements reflected in RES-24-00107 (Legistar 81632) passed on February 13, 2024; and

BE IT FURTHER RESOLVED, the City continues to have concerns regarding noise impacts of the existing and recommended freeway facilities and asks that WisDOT address those impacts;

BE IT FINALLY RESOLVED, the City requests that in addition to motor-vehicle improvements, that federal funding participate in interchange and bicycle/pedestrian improvements subject to WisDOT's cost share policy, reducing cost to both WisDOT and the City of Madison.

From: Patrick Gavinski <Patrick.Gavinski@saukcountywi.gov>
Sent: Wednesday, February 14, 2024 2:10 PM
To: Oettinger, James - DOT <James.Oettinger@dot.wi.gov>
Subject: RE: IH 39/90/94 Study

**CAUTION: This email originated from outside the organization.
Do not click links or open attachments unless you recognize the sender and know the content is safe.**

Jim,

Just following up on our phone conversation. There are currently drainage issues at old 12 and CTH H so I would not recommend lowering CTH H in that area. As far as the split Dimond interchange the committee was not in favor of that. we would prefer that the trumpet is looked at with adequate curves and acceleration/deceleration lengths.

Thanks
Pat



Patrick Gavinski, P.E.
Highway Department | Highway Commissioner
Phone: (608) 355-4380 | Fax: (608) 355-4398
Email: Patrick.gavinski@saukcountywi.gov
Address: 620 Linn St, Baraboo, WI 53913

NOTICE: This e-mail and any attachments may contain confidential information. Use and further disclosure of the information by the recipient must be consistent with applicable laws, regulations and agreements. If you received this e-mail in error, please notify the sender; delete the e-mail; and do not use, disclose or store the information it contains.

From: Oettinger, James - DOT <James.Oettinger@dot.wi.gov>
Sent: Tuesday, February 13, 2024 3:35 PM
To: Patrick Gavinski <Patrick.Gavinski@saukcountywi.gov>
Subject: IH 39/90/94 Study

CAUTION: This email originated from outside of your organization. Do not click links or open attachments unless you recognize the sender's email address and know the content is safe.

Pat, could you give me a call when you have a chance? There seems to be confusion with my study team as for who wants access to IH 90/94 from CTH H. When I ask the question, I was told that Sauk County mentioned it but I can't find anything in writing anywhere. For the WIS 13 interchange, we are going back and forth between a split diamond (provides access to H) and upgrading the existing trumpet.

Wondering what you are hearing that might help my team make a decision. Thanks...Jim

**SUN PRAIRIE COMMITTEE OF THE WHOLE PROCEEDINGS
SUN PRAIRIE, WISCONSIN 53590
MARCH 19, 2024**

Council President Theresa McIlroy was present and presided over the Committee of the Whole Meeting. The meeting was called to order at 5:30 pm in the Council Chambers of the Municipal Building, located at 300 East Main Street, Sun Prairie, WI, 53590.

Present and responding to roll call were the following:

Voting Member:	Steve Stocker, District 1 Council Member
	David Virgell, District 4 Council Member
	Faustina Bohling, District 4 Council Member
	Maureen Crombie, District 3 Council Member
	Brent Eisberner, District 2 Council Member
	Mike Jacobs, District 3 Council Member
	Robert Jokisch, District 2 Council Member
	Theresa McIlroy, District 1 Council Member

Also Present:

Non-Voting Member:	Paul T. Esser, Mayor
	Yessi Arce, Deputy City Clerk
	Aaron Oppenheimer, City Administrator
	Svetha Hetzler, Library Director
	Scott Kugler, Director of Community Development
	Kathleen McDaniel, City Attorney
	Caitlin Stene, Director of Administrative Services
	Tom Veith, Assistant City Engineer
	Rick Wicklund, SPU Superintendent

1. CALL TO ORDER AND ROLL CALL

- Council President McIlroy called the meeting to order at 5:30 p.m.

A. Summary Report

2. APPROVAL OF MINUTES

MOTION: Ald. Stocker (1), Ald. Virgell (2) motion to approve the minutes as presented.

Motion Carried unanimously by voice vote.

A. March 5, 2024

3. CITIZEN APPEARANCES/PUBLIC COMMENT

4. COUNCIL LIAISON/COMMITTEE MEMBER REPORTS

- Alderperson Stocker reported that the Friends of the Sun Prairie Parks will be having a Earth Day Clean Up event on Saturday, April 20th at 9am starting at the Sheehan Park.

5. UNFINISHED BUSINESS

6. NEW BUSINESS

- A. Consideration, discussion, and possible action on 1-39/90/94 study and presentation of latest design option

- David Schmid, Corridor Study Project Manager from the WI DOT was present to answer any questions and presented the latest design option.

MOTION: Ald. Virgell (1), Ald. Eisberner (2) motion to support the DOT selection of Alternative 1 layout and added general purpose lane

Motion Carried unanimously by voice vote.

- B. Presentation and Update regarding Sun Prairie Utilities (SPU) new facility building schedule and bidding process

- SPU Utility Manager Wicklund was present to answer any questions and provided an update about the new facility building schedule and bidding process.

- C. Presentation and Update regarding Sun Prairie Public Library's expansion and renovation construction

- Library Director Hetzler was present to answer any questions and presented an update regarding the Sun Prairie Public Library's expansion and renovation construction.

- D. Consideration, discussion, and possible action on Council Chamber audio upgrades

- Director of Information Technology McDermott was present to answer any questions.

MOTION: Ald. Eisberner (1), Ald. Crombie (2) motion to approve the proposed audio upgrades for Council Chambers and increase the capital borrowing for 2024 by \$64,277 to cover the expenses associated with this project.

Motion CARRIED by the following roll call vote:

Aye: Stocker, Virgell, Bohling, Crombie, Eisberner, Jacobs, Jokisch, McIlroy
Nay: (None)
Abstain: (None)
Absent: (None)

- E. Consideration, discussion, and possible action on proposed Sun Prairie Fire and EMS Study with Wisconsin Policy Forum

MOTION: Ald. Crombie (1), Ald. Stocker (2) motion to approve the proposal with Wisconsin Policy Forum for completion of the Sun Prairie Fire and EMS study and authorize City Administrator to execute agreement.

- City Administrator Oppenheimer provided an overview of the proposed Sun Prairie Fire and EMS Study with Wisconsin Policy Forum.

Motion CARRIED by the following roll call vote:

Aye: Stocker, Virgell, Bohling, Crombie, Eisberner, Jacobs, Jokisch, McIlroy
Nay: (None)

Abstain: (None)

Absent: (None)

7. REPORT OF THE COUNCIL PRESIDENT

- Council President McIlroy provided her report.

8. REPORT OF THE CITY ADMINISTRATOR

- City Administrator Oppenheimer provided his report.

9. REFERRALS

10. ADJOURNMENT

MOTION: Ald. (1) motion to adjourn at 6:47 p.m.

I hereby certify that the foregoing was action of the Common Council on March 19, 2024.

DocuSigned by:

Theresa McIlroy

A6C5EBB8ED46460...

Theresa McIlroy, Council President

DocuSigned by:

Yessi Arce

F88C9F354C4846C...

Yessi Arce, Deputy City Clerk

Minutes approved as distributed at the 4/16/2024 Committee of the Whole.



MEMO

To: David Schmidt, PE, Project Manager, Wisconsin
Department of Transportation (DTSD)

From: Jason Valerius, AICP, Executive Director,
Capital Area Regional Planning Commission (CARPC)

Date: May 3, 2024

Subject: I-39/90/94 Concurrence Point #2

Mr. David Schmidt,

CARPC staff have reviewed the DTSD's Preferred Alternatives memo and revised Coordination Plan for impacts on water resources and consistency with the Regional Development Framework (RDF). The Framework was adopted in 2022 and features development strategies and practices within Dane County that reflect extensive public feedback across the region, like:

- Prioritizing infill development and redevelopment within identified centers and corridors, and
- Utilizing Green Infrastructure and urban tree canopy to enhance living quality and protect surface water quality.

We want to highlight and comment on alternatives for three interchanges related to their consistency with the RDF, wetland impacts, and their potential impact on Environmental Corridor designations managed by CARPC:

1. Milwaukee Street Interchange (Proposed new):

The Regional Development Framework (RDF) shows a Community Center node north of I-94 near this proposed interchange, around the Sprecher Road/ Reiner Rd/CTH T intersection. This reflects the City of Madison's district/neighborhood planning for the area. The compact, mixed-use, transit-supported development envisioned by the City and in the RDF is more certain to be achieved if the area also has good highway access, and for this reason CARPC supports construction of an interchange at Milwaukee Street. The proposed interchange also offers an opportunity to enhance wetland quality adjacent to the area of impact as a mitigation strategy. The selection of the Partial Cloverleaf alternative would impact Environmental Corridors located on the south side of the Interstate within the Central USA, requiring an administrative minor change to Environmental Corridor mapping.

2. **US 151/High Crossing Blvd Interchange:** Alternatives that either divert East Washington as a local street or connect it to High Crossing fit better within the Regional Development Framework, aligning more closely with the Framework's network of centers and corridors. Redirecting or segregating local traffic will better facilitate redevelopment along the corridor and strengthen transit service to that development, especially if aligned south of the highway. Most Environmental Corridors in the area consist of stormwater management facilities. Adjustments to Environmental Corridors may be required.
3. **Hoepker Road Interchange (Proposed new):** The RDF reflects City of Madison plans for this area, including employment growth west of the proposed interchange and neighborhood development to the east. The Shifted Diamond configuration is preferred over a Partial Cloverleaf because it consumes less land that could otherwise support development. There will be some wetland impacts with this interchange, which is an opportunity to mitigate those losses with new or modified wetlands of enhanced quality. Environmental Corridors exist primarily east of the proposed interchange and are comprised of stormwater management areas and open space. Adjustments to Environmental Corridors may be required.

We appreciate the opportunity to provide input and highlight the linkages to land use and water quality. Our transportation investments should always reinforce the quality of our communities as great places to live.

Should you have any questions or require further clarification, please do not hesitate to contact us.

Regards,

A handwritten signature in black ink that reads "Jason Valerius". The signature is fluid and cursive, with the first name "Jason" and last name "Valerius" clearly distinguishable.

Jason Valerius, AICP
Executive Director
Capital Area Regional Planning Commission

CC: Alexandra Andros, Executive Director, Greater Madison MPO
David Pfeiffer, Chair, CARPC