APPENDIX G

Environmental Justice Plan and Preliminary Analysis





US 51 (Stoughton Road) North Study

Environmental Justice Plan & Preliminary Analysis

August 2023

EXECUTIVE SUMMARY

ENVIRONMENTAL JUSTICE

The Wisconsin Department of Transportation (WisDOT) and Federal Highway Administration (FHWA) recognizes the importance of implementing environmental justice into project development efforts. The key law and executive order and policy directives behind environmental justice assessment requirements are Title VI of the Civil Rights Act of 1964 and Executive Order 12898 issued by President Clinton in 1994.

Title VI of the Civil Rights Act of 1964 prohibits intentional discrimination, as well as disparate impact discrimination, on the basis of race, color and national origin in programs and activities receiving federal financial assistance.

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, signed by the President on February 11, 1994, directs Federal agencies to take the appropriate and necessary steps to identify and address disproportionately high and adverse effects of federal projects on the health or environment of minority and low-income populations to the greatest extent practicable. The Executive Order states, to the extent practicable and permitted by law, that neither minority populations nor low-income populations may receive disproportionately high or adverse effects as a result of a proposed federal actions.

The Presidential Memorandum accompanying EO 12898 focuses Federal attention on the environmental and human health conditions in minority and low-income communities, enhances efforts to assure nondiscrimination in Federal programs affecting human health and the environment and promotes meaningful opportunities for access to public information and for public participation in matters relating to minority and low-income communities and their environment.

Executive Order 14096, *Revitalizing Our Nation's Commitment to Environmental Justice for All*, signed by the President on April 21, 2023, supplements EO 12898 to address environmental justice. EO 14096 directs Federal agencies to identify, analyze and address disproportionate and adverse human health and environmental effects (including risks) and hazards of federal activities, including those related to climate change and cumulative impacts of environmental and other burdens on communities with environmental justice concerns.

FHWA Memorandum, "Guidance on Environmental Justice and NEPA", 2011, outlines the process to address environmental justice during the NEPA review, including documentation requirements, as well as detailing elements and steps to be followed. This guidance applies to all NEPA classes of action and requires the following steps:

- Identify existing minority populations or low-income populations
- Explain coordination with access to information and participation of environmental justice populations
- Identify disproportionately high and adverse effects (if applicable) on environmental justice populations

To determine if adverse effects will have disproportionately high and adverse effects on minority or low-income populations, the NEPA document must evaluate whether the adverse effect is predominately borne by a minority or low income population, or if the affect suffered by the minority or low income population will be appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the general population and whether practicable mitigation measures or alternatives exist that would avoid or reduce the disproportionately high and adverse effects on minority or low-income populations.

In accordance with FHWA Order 6640.23A "Actions to Address Environmental Justice in Minority Populations and Low-income Populations", FHWA should take into account mitigation and enhancement measures that avoid or minimize impacts on minority and low-income populations, offsetting the benefits and/or impacts of other system elements. Projects with disproportionately high and/or adverse effects on minority or low-income populations will only be carried out if further mitigation measures or alternatives that would avoid or reduce the disproportionately high and adverse effects are not practicable.

ENVIRONMENTAL JUSTICE ANALYSIS AND PLAN

The US 51 (Stoughton Road) North Study Environmental Justice Analysis and Plan reflects WisDOT and FHWA's interest in environmental justice for stakeholders affected by or interested in the planning and implementation of the US 51(Stoughton Road) North Study. The purpose of this document is threefold. The document presents:

- A plan for identification of environmental justice populations within US (Stoughton Road) 51 North corridor study boundary based on demographic data
- An assessment methodology of impacts to existing environmental justice populations in the study boundary
- A public engagement plan for environmental justice populations in the study area

This document provides a preliminary environmental justice population analysis through identifying existing environmental justice populations in the study corridor. The next step is to analyze adverse or beneficial impacts to minority or low-income populations in those areas compared with populations that are not minority or low-income specific to alternatives considered. These impacts (direct, indirect and cumulative) will be documented thoroughly in the US 51 (Stoughton Road) North Corridor environmental document.

WisDOT used data available from the United States Census Bureau to identify potential environmental justice populations in the US 51 (Stoughton Road) North study area. A series of maps and tables provide an overview of the various social and economic groups present in the study corridor. The preliminary environmental justice analysis includes three study bands to identify potential environmental justice populations in the study corridor:

- A Study Area Boundary
- A 0.25-mile Buffer Boundary (from study boundary)
- A 0.5-mile Buffer Boundary (from study boundary)

WisDOT obtained 2021 American Community Survey (ACS) demographic information for each corridor noted above. To serve as a point of comparison, demographic information from the following entities was obtained:

- A 0.5-mile Buffer Boundary
- Dane County
- State of Wisconsin

Preliminary analysis on the presence of low-income, minority and other populations within these specific geographic proximities is found in this document. There are environmental justice populations found throughout the US 51 (Stoughton Road) North corridor and concentrated within certain portions of the study area. This document identifies these areas while the environmental document will discuss specific impacts to these environmental justice populations.

Data was pulled from 2021 ACS 5-year tables and summarized in this document. The following is an overview:

- Minority populations: minorities made up about 35 percent of the population within the 0.5-mile buffer boundary of US 51. The greatest population of minorities identify as African American (13.2%), followed by Hispanic (12.4%), Two or More Races (5.2%) and Asian (3.6%), of the total population.
- Median household income: the median household income within a 0.5-mile buffer boundary of the corridor is \$61,185. This was lower than the median household income for Dane County (\$77,221) and for the state of Wisconsin (\$67,125). For comparison purposes, the 2021 HHS guideline a four-person household considered to be living in poverty had a total income less than \$26,500.

July 2023

• Poverty levels: the percentage of total persons living in poverty in the 0.5-Mile buffer boundary of the corridor was 12.5%. This is slightly higher than the total persons living in poverty in Dane County (10.0%) and slightly higher than the state of Wisconsin (10.5%).

OUTREACH

In addition, this document lists the neighborhood and community groups and other organizations the study team will reach out to as part of this study. The study team will contact and arrange to meet with these stakeholders to inform them of the study, solicit relevant input on the study and to equip them with information regarding public involvement meetings and other opportunities for their membership to provide input on the study. Post-meeting follow-up will include database additions for mailed and electronic newsletters to keep stakeholders informed of the project status and timeline.

July 2023

CONTENTS

1.0	Pur	oose a	nd Goals of the Environmental Justice Analysis and Plan	1-1			
	1.1.	Enviro	onmental Justice Background	1-1			
	1.2.	Purpo	se of Environmental Justice Analysis and Plan	1-2			
	1.3.	Goals		1-2			
2.0	Prel	iminar	y Analysis	2-3			
	2.1.	Enviro	onmental Justice Populations	2-3			
	2.2.	Enviro	onmental Justice Analysis Areas	2-4			
3.0	0 Proposed Methodology						
4.0	Env	ironme	ental Justice Preliminary Analysis	4-1			
	4.1.		nology				
	4.2.	Gener	ral Population	4-1			
	4.3. Race and Ethnicity						
		4.3.1.	White/Caucasian Population	4-3			
		4.3.2.	Minority Population	4-3			
		4.3.3.	Minority Population Breakdown	4-7			
		4.3.4.	African American Population	4-9			
		4.3.5.	Hispanic Population	4-10			
		4.3.6.	Two or More Races Population	4-11			
		4.3.7.	Asian Population	4-12			
	4.4.	Low-Ir	ncome Populations	4-13			
		4.4.1.	Median Household Income	4-13			
		4.4.2.	Poverty	4-15			
5.0	Out	reach		5-1			
6.0	Env	ironme	ental Justice Staff Resources	6-1			
7.0	Time	elines,	Activities and Deliverables	7-1			
8.0	Ten	tative I	Methods of Evaluation of Environmental Justice Plan Effectiveness	8-1			

Tables

Table 1: Population Demographics, Race and Ethnicity	4-4
Table 2: Median Household Income (USD)	4-13
Table 3: Population Demographics, Percent of Persons in Poverty	4-15
Table 4: Language Proficiency (Population Who Speak English Less Than "Very Well")	5-1
Table 5: Community Organization Outreach	5-3
Table 6: Neighborhood Association/Municipal Outreach	5-7
Table 7: Business Outreach	5-7
Table 8: Environmental Justice Staff Resources	6-1
Table 9: Timeline and Deliverables	7-1
Figures	
Figure 1: Study Location Map	2-5
Figure 2: US 51 (Stoughton Road) North Study Areas	2-6
Figure 3: Total Population in US 51 (Stoughton Road) North Corridor	4-2
Figure 4: US 51 (Stoughton Road) North: White Population Alone (Not Hispanic or Latino)	4-5
Figure 5: US 51 (Stoughton Road) North: Percent Minority Population	4-6
Figure 6: Minority Breakdown	4-7
Figure 7: Percent African American Population Within 0.5-Mile Buffer Around Study Boundary	4-9
Figure 8: Percent Hispanic Population Within 0.5-Mile Buffer Around Study Boundary	4-10
Figure 9: Percent Two or More Races Population Within 0.5-Mile Buffer Around Study Boundary	4-11
Figure 10: Percent Asian Population Within 0.5-Mile Buffer Around Study Boundary	4-12
Figure 11: US 51 (Stoughton Road) North, Median Household Income	4-14
Figure 12: Persons Below Poverty Level in US 51 (Stoughton Road) North	4-16
Figure 13: Limited English Proficiency (Population Who Speak English Less Than "Very Well")	5-2

1.0 Purpose and Goals of the Environmental Justice Analysis and Plan

This US 51 (Stoughton Road) North Environmental Justice Analysis and Plan identifies and describes environmental justice populations and stakeholders within the US 51 (Stoughton Road) North study area. The plan is provided to conduct an analysis to determine if there are disproportionately high and adverse effects of the study being borne by environmental justice populations. The results of this detailed analysis will be presented in the US 51 (Stoughton Road) North environmental document.

1.1. Environmental Justice Background

Title VI of the Civil Rights Act of 1964 prohibits intentional discrimination, as well as disparate impact discrimination, on the basis of race, color and national origin in programs and activities receiving federal financial assistance.

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, signed by the President on February 11, 1994, directs Federal agencies to take the appropriate and necessary steps to identify and address disproportionately high and adverse effects of federal projects on the health or environment of minority and low-income populations to the greatest extent practicable. The Executive Order states, to the extent practicable and permitted by law, that neither minority populations nor low-income populations may receive disproportionately high or adverse effects as a result of a proposed federal actions.

The Presidential Memorandum accompanying EO 12898 focuses Federal attention on the environmental and human health conditions in minority and low-income communities, enhances efforts to assure nondiscrimination in Federal programs affecting human health and the environment, and promotes meaningful opportunities for access to public information and for public participation in matters relating to minority and low-income communities and their environment.

Executive Order 14096, *Revitalizing Our Nation's Commitment to Environmental Justice for All*, signed by the President on April 21, 2023, supplements EO 12898 to address environmental justice. EO 14096 directs Federal agencies to identify, analyze and address disproportionate and adverse human health and environmental effects (including risks) and hazards of federal activities, including those related to climate change and cumulative impacts of environmental and other burdens on communities with environmental justice concerns.

FHWA Memorandum "Guidance on Environmental Justice and NEPA", 2011, outlines the process to address environmental justice during the NEPA review, including documentation requirements, as well as detailing elements and steps to be followed. The memorandum supplements FHWA Technical Advisory T 6640.8A, 1987, which provides guidance for documenting the potential social, economic and environmental impacts considered in the selection and implementation of highway projects. This guidance applies to all NEPA classes of action and requires the following steps:

- Identification of existing minority populations or low-income populations
- Explanation of coordination, access to information and participation of environmental justice populations
- Identification of disproportionately high and adverse effects (if applicable) on environmental justice populations

As part of the environmental document, WisDOT and FHWA will complete an environmental justice analysis to determine whether the proposed project has the potential to incur disproportionately high and adverse effects upon minority populations or low-income populations. FHWA Order 6640.23A "Actions to Address Environmental Justice in Minority Populations and Low-Income Populations" provides definitions as follows:

- Adverse effects are defined in FHWA Order 6640.23A as the totality of significant individual or cumulative human health or environmental effects, including interrelated social and economic effects, which may include, but are not limited to the following: bodily impairment, infirmity, illness, or death; air, noise and water pollution and soil contamination; destruction or disruption of man-made or natural resources; destruction or diminution of aesthetic values; destruction or disruption of community cohesion or a community's economic vitality; destruction or disruption of the availability of public and private facilities and services; vibration; adverse employment effects; displacement of persons, businesses, farms, or nonprofit organizations; increased traffic congestion, isolation, exclusion, or separation of minority or low-income individuals within a given community or from the broader community; and the denial of, reduction in, or significant delay in the receipt of, benefits of FHWA programs, policies, or activities.
- Disproportionately high and adverse effects on low-income populations and minority populations is defined in FHWA Order 6640.23 as follows: (1) the effect is predominately borne by a minority population and/or a low-income population; or (2) the effect will be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low-income population.

If the high and adverse impacts are found to be borne disproportionately by low-income populations and minority populations, an analysis must examine mitigation measures, offsetting benefits and impacts of other system elements in accordance with FHWA Order 6640.23A, "Actions to Address Environmental Justice in Minority Populations and Low-Income Populations", issued in 2012.

1.2. Purpose of Environmental Justice Analysis and Plan

The US 51 (Stoughton Road) North Environmental Justice Analysis and Plan identifies a set of goals, recommended target audiences and proposed deliverables. The plan also defines criteria to identify and communicate with minority persons and low-income persons located within the study area, as well as strategies to assess impacts and mitigate potential adverse impacts on those populations. Analysis will include close coordination with public outreach efforts and will document communication between WisDOT and leaders, groups and individuals representing minority groups and low-income groups within the study area. Information, results of analyses and feedback received from stakeholders will be documented and provided to the study team throughout the process.

1.3. Goals

Specific goals of the US 51 (Stoughton Road) North Environmental Justice Analysis and Plan include:

- Identifying and locating minority populations and/or low-income populations within the study area¹.
- Conducting outreach and building open lines of communication to engage minority and low-income stakeholders in discussion to identify interests, questions, concerns and obtain feedback into the proposed study design.

The environmental justice analysis includes an outreach component and thus becomes closely tied with the Public Involvement effort². The US 51 (Stoughton Road) North study team anticipates that the efforts outlined in this plan will enhance the Public Involvement process and encourage interested parties to share ideas, expectations and concerns for the study and future WisDOT studies or projects, resulting in the best possible integrity of the study and well-being of all stakeholders.

¹ Minority populations and low-income populations are two distinct population categories. Executive Order 12898 applies to both categories independent of one another.

² See US 51 Stoughton Road Public Involvement Plan

Results of this analysis and plan will assist the study team in determining if potential disproportionately high and adverse human health and environmental impacts may occur as a result of the US 51 (Stoughton Road) North study. This analysis will be included as part of the environmental document.

This represents an initial look at demographic composition of the study area. Additional demographic data may be required, or the same data may be gathered for a larger area after the study's area of effect is better understood. This will be determined during initial outreach to environmental justice groups and as the initial range of alternatives are developed and evaluated.

2.0 Preliminary Analysis

2.1. Environmental Justice Populations

In order to meet specific requirements outlined in Executive Order 12898³, WisDOT will conduct a preliminary analysis of the various demographic groups located near the study corridor and will include focused communication through outreach in the following general demographic groups. To determine the presence of minority and low-income populations in the study area, WisDOT used localized block group data supplemented by the study team's public involvement plan and other relevant data sources.

Minority – a person who is:

- African American (having origins in any of the black racial groups of Africa)
- Hispanic or Latino (of Mexican, Puerto Rican, Cuban, North American, or other Spanish culture or origin, regardless of race)
- Asian American (having origins in any of the original peoples of East or Southeast Asia, the Indian subcontinent, or the Pacific Islands)
- American Indian (having origins in any of the original people of North America and who maintains cultural identification through tribal affiliation or community recognition)
- Hawaiian Native or other Pacific Islander (people having origin in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islanders)
- Caucasian and any combination of the above

Low-income – is defined as a household income at or below poverty thresholds. According to the U.S. Census Bureau, a family is considered in poverty if their income is lower than the poverty threshold for that family. For example, in 2021, the U.S. Census Bureau set the poverty threshold for a family of four, with two children under the age of 18, to a total family income of less than \$27,479 (U.S. Census Bureau 2022)⁴.

Other population groups not protected under the Executive Order or Environmental Justice but potentially affected by the proposed action:

Persons with disabilities (Americans with Disabilities Act Amendment Act)⁵

³ Executive Order 12898

⁴ Income data is collected by the American Community Survey (ACS) in the year preceding the U.S. Census Bureau publication. The ACS tracks local economic conditions annually rather than on a decennial basis like the U.S. Census. The U.S. Department of Health and Human Services (HHS) annually publishes poverty guidelines to determine financial eligibility for certain programs. The HS guidelines are a simplification of the U.S. Census Bureau's poverty thresholds for use for administrative purposes; for instance, determining financial eligibility for certain federal programs. According to the HHS guideline, in 2021 a household containing four persons was considered to be living in poverty if the total income of the family was less than \$26,500.

⁵ Americans with Disabilities Act Amendment Act

- Elderly (Age Discrimination Act)⁶
- Limited English Proficiency (Executive Order 13166)⁷
- Children⁸
- · Persons with no access to a personal vehicle

2.2. Environmental Justice Analysis Areas

The US 51 (Stoughton Road) North study area includes approximately 5.5 miles of US 51 from WIS 30 (South limit) to I-39/90/94. (**Figure 1**).

The preliminary environmental justice analysis includes three study bands to identify potential environmental justice populations in the study corridor:

- A Study Area Boundary
- A 0.25-mile Buffer Boundary (from the study boundary)
- A 0.5-mile Buffer Boundary (from the study boundary)

Figure 2 shows the location of the study bands listed above.

July 2023 2-4

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⁶ Age Discrimination Act

⁷ Executive Order 13166

⁸ Executive Order 13045

Figure 1: Study Location Map

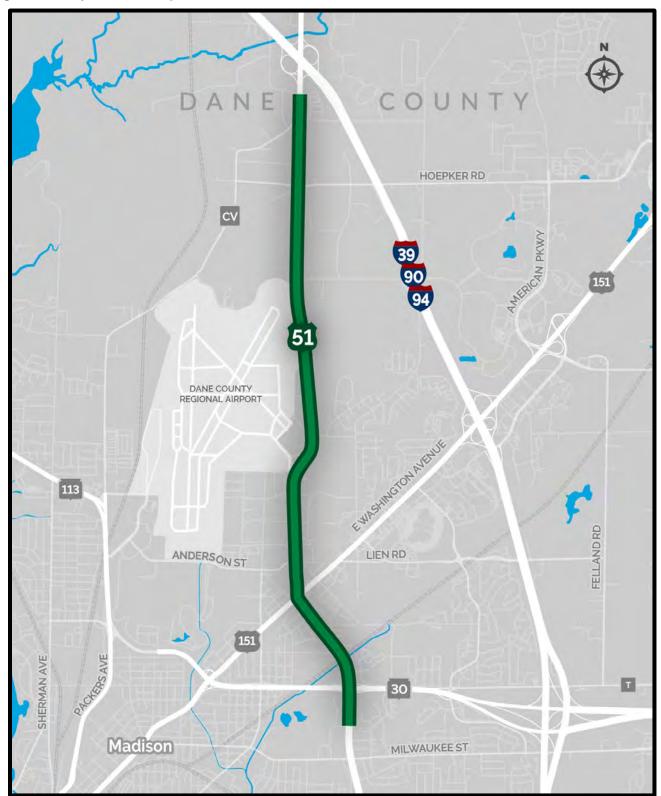
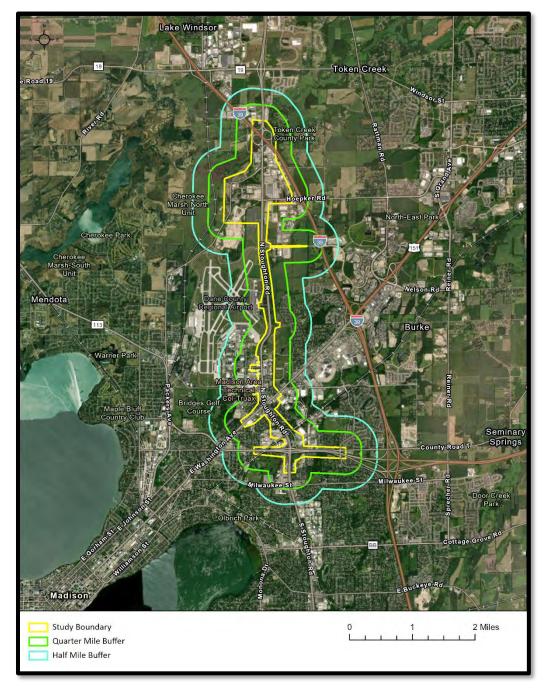


Figure 2: US 51 (Stoughton Road) North Study Areas



3.0 Proposed Methodology

The US 51 (Stoughton Road) North corridor is surrounded by many different and distinct communities, neighborhoods and organizations; thus, the pool of stakeholders is large and diverse. Census information will initially be analyzed to determine stakeholder make-up and best identify and assess their needs. WisDOT's preliminary analysis will include but not be limited to identifying the following within the study limits:

- Low-income stakeholder census tracts
- Low-income rental property locations
- Minority populations
- Businesses
- Community organizations
- Preferred contact person at each identified local government
- Schools
- Cemeteries

The environmental justice analysis will include a demographic profile of stakeholders, including 2021 ACS data and documentation of issues and concerns raised by various stakeholders. Stakeholders who are not located directly within the limits designated for analysis may be identified through the Public Involvement process. Due to the interconnectedness between environmental justice and public involvement, the environmental justice analysis may incorporate considerations of issues raised as part of the public involvement effort where appropriate.

While the primary objective of the environmental justice analysis is to assess the disproportionate impacts to certain populations resulting from proposed actions, it is important that the analysis also provides information on low-income and minority populations so that alternatives which address recurring community-wide problems can be developed. This approach includes both a qualitative and quantitative process of gathering stakeholder input on the potential impacts of alternatives identified during the environmental process, as well as data gathering using various demographic and economic data resources available at the regional, state and federal levels.

The environmental justice analysis will be completed in five phases as summarized below. This document will address Phase I (identify and describe stakeholders within the US 51 (Stoughton Road) North Corridor); while the other four phases will be completed as part of environmental document development and discussed in the environmental document.

Phase I - Identify and describe stakeholders within the US 51 Stoughton Corridor

- 1. Develop a base map of the defined limits of the environmental justice study area.
- Overlay the base map with the recommended initial distance of one-half mile, either direction of the study corridor, to identify the range of potential schools, residences and other stakeholders within the environmental justice study area.
- Determine the presence and estimate the size of the minority populations and/or low-income populations within the recommended initial distance.
- 4. Identify and give a brief demographic description of the minority populations and/or low-income populations within the environmental justice corridor limits and initial half-mile radius.
- Where appropriate, identify and give a brief description of communities within study limits.
- 6. Where appropriate, develop a community profile to include applicable and/or appropriate:
 - a. Neighborhood boundaries
 - b. Demographic information

- Economic data
- d. Other pertinent data

Areas of interest to the environmental justice analysis will be identified through part of the PI team's outreach specialists and socioeconomic analysis efforts. These efforts include identification and consideration of the location and nature of neighborhoods and residents within the study limit, a brief overview of the local social history of the communities within the area and the land use plans.

Phase II – Identify and define the socio-economic factors of communities along the corridor

Pursuant to WisDOT's policy and procedures, analysis of the socio-economic factors requires an analysis that extends beyond quantifiable aspects to non-quantifiable aspects such as a community's values and history.

Analysis of socio-economic factors will be addressed as part of the environmental assessment (EA) and will include from this effort, but not to be limited to: neighborhood and community cohesion, regional economic impacts and public and private development plans.

Phase III - Identify and assess issues, concerns of Environmental Justice and stakeholder populations within the corridor study area

- Using information gathered from public involvement and information collected above, WisDOT will identify and describe issues of concern or controversy within the minority communities and low-income communities.
- Using the range of alternatives, data collected, issues identified and described, WisDOT will identify effects
 to minority populations and low-income populations resulting from the reasonable alternatives developed
 and presented at the public information hearings.

Phase IV – Analysis of impacts to minority populations and/or low-income populations

Assess whether effects to the minority populations and/or low-income populations are beneficial or adverse. Review considerations include:

- Are the effects proportionate or disproportionate to those experienced by non-minority and/or non-low-income populations?
- Are the effects direct, indirect or cumulative?
- Are there any disproportionately high and adverse effects that are predominantly borne by minority populations and low-income populations?
- What are the comparative effects experienced by minority or low-income populations and are they more severe or greater in magnitude than the adverse effects suffered by non-minority?
- Are any of the minority populations protected under Title VI of the 1964 Civil Rights Act, which prohibits discrimination on the basis of race, color or country of origin?
- Consider the Age Discrimination Act or Americans with Disabilities Act.

Provide data, support and brief analysis for consideration in the development of the environmental document. Review discussion of the potential mitigation and enhancement efforts to address disproportionately high and adverse effects to environmental justice populations

Phase V - Environmental Justice link to Public Involvement

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The environmental justice component is closely related to public involvement on the US 51 (Stoughton Road) North Study corridor, as the study's communication efforts will strive to ensure the full and fair participation of minority populations and low-income groups to provide input to the study team. Public Involvement continues to serve a vital role to educate citizens about the transportation development process and increase the likelihood of implementation of an alternative through informed consent from all groups.

4.0 Environmental Justice Preliminary Analysis

4.1. Terminology

The terminology used in this document is intended to have the same definitions used in the census and ACS. Terms used such as "Hispanic", "family" and "poverty" have the same meaning as used in the census.

The following figures describe demographic and economic data provided in the 2021 ACS. A census block is the smallest geographical unit used by the United States Census Bureau to collect and tabulate data from the decennial census. Census blocks are used to aggregate data on race, ethnicity and income. A census block group is a compilation of census blocks. A census tract is a larger geographical unit that is made up of several census block groups. Census tracts are typically more diverse than census blocks or block groups. Census tracts are used by the Census Bureau to report data on social, economic and demographic characteristics at a local level, such as poverty rates, educational attainment and housing affordability.

For race and ethnicity categories, census blocks were used. For economic categories, census blocks were used when data was available and tracts when block data was not available. The following figures and tables display actual counts and percentages of select populations within each census block.

4.2. General Population

Figure 3 shows the total population of each census block. The land use within a 0.5-mile buffer around the study boundary contains large portions of agriculture, recreation, vacant space and transportation (airport).

Lake Windsor Token Creek State Road 19 Windsor St Token Oreek County Park Cherokee Marsh-North Unit North-East Par Cherokee Marsh-South Unit Welson Rd @ Demo County Regional Aliport Mendota 113 Burke Madison Area Treaminal S Ocil-Tiruex Warner Park Maple Bluff Country Club D Ave County Road 7 Sprin Milwaukee St Vilwaukee St Door Creek Park Olbrich Park Cottage Grove Rd ВВ Study Boundary **Total Population** Quarter Mile Buffer Less than 850 2 Miles Half Mile Buffer 851 - 1249 Municipal Boundaries 1250 - 1749 1750 - 2499 2500 - 4500

Figure 3: Total Population in US 51 (Stoughton Road) North Corridor

4.3. Race and Ethnicity

Population by race was taken from data indicating race alone (2021 ACS Table B02001). It should be noted that 'Hispanic' is an ethnic group and not a race category and is expressed separately from race in the data. Thus, those who identify as Hispanic have a racial identity (White, African American, etc.) in addition to an ethnic identity as Hispanic. Total minority population was calculated as the sum of all non-white race groups.

Demographics within the three bands – study boundary, 0.25-mile buffer boundary and 0.5-mile buffer boundary, have been identified and compared to the demographics of Dane County and the State of Wisconsin. The data depicted below (**Table 1**) represent various sub-groups of the population.

Compared to the state of Wisconsin and Dane County, US 51 (Stoughton Road) North has a minority population about 15 percentage points higher in the 0.5-mile boundary around the study area. The minority population is made up of 13.2% African American, 12.4% Hispanic, 5.2% Two or More Races and 3.6% Asian

4.3.1. White/Caucasian Population

The following exhibit provides data on the White/Caucasian population in and near the US 51 (Stoughton Road) North study area.

Figure 4 illustrates where white populations live within the study corridor. The census blocks with the highest percentage of white population alone are scattered in both the southern and northern portions of the 0.5-mile buffer study area.

4.3.2. Minority Population

The following exhibit provides data on the minority population in and near the US 51 (Stoughton Road) North study area.

Figure 5 illustrates where minority populations live within and near the study corridor. A higher percentage of the population identifies as a minority in the southern half of the study area. In contrast, less than 10% of the population located north of I-39/90/94 identify as a minority population.

Table 1: Population Demographics, Race and Ethnicity

	Study I	Boundary	0.25-Mile	Boundary	0.5-Mile	Boundary	Dane (County	State of '	Wisconsin
	Count	%	Count	%	Count	%	Count	%	Count	%
Population	2,684	100.0%	8,743	100.0%	15,454	100.0%	555,474	100.0%	5,871,661	100.0%
White	1,766	65.8%	5,621	64.3%	10,096	65.3%	434,318	78.2%	4,705,965	80.1%
Minority	918	34.2%	3,122	35.7%	5,357	34.7%	121,156	21.8%	1,165,696	19.9%
African American	350	13.0%	1,260	14.4%	2,047	13.2%	27,528	5.0%	364,446	6.2%
American Indian	1	0.0%	7	0.1%	22	0.1%	1138	0.2%	39,457	0.7%
Asian	83	3.1%	263	3.0%	561	3.6%	33,102	6.0%	165,139	2.8%
Native Hawaiian Pacific Islander	1	0.0%	4	0.0%	6	0.0%	193	0.0%	2,395	0.0%
Other	0	0.0%	1	0.0%	5	0.0%	1,786	0.3%	12,531	0.2%
Two or More	175	6.5%	494	5.7%	801	5.2%	20,244	3.6%	157,130	2.7%
Hispanic	308	11.5%	1,093	12.5%	1,915	12.4%	37,165	6.7%	424,598	7.2%

Lake Windsof Token Creek State Road 19 Windsor St Cherokee Marsh-North Unit Cherokee Park Welson Rd 🕷 Mendota Dane County Regional Airport Burke 113 Warner Park Madison Area Technical Col-Truax Maple Bluff Seminary Springs Milwaukee St Door Creek Park Olbrich Park Madison Percent Population White Alone Study Boundary Less than 25% 0.5 1 1.5 2 Miles Quarter Mile Buffer 25 - 44% Half Mile Buffer 45 - 64% I Municipal Boundaries 65 - 89% Above 90%

Figure 4: US 51 (Stoughton Road) North: White Population Alone (Not Hispanic or Latino)

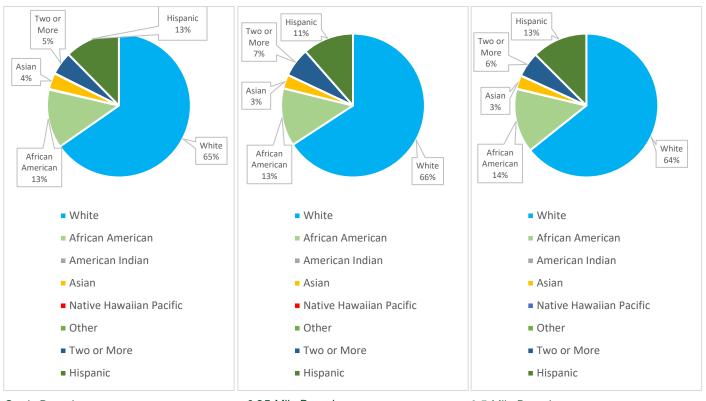
Lake Windsor 19 Token Oreek 19 State Road 19 Whiteores: Token Creek County Park Cherokee Marsh-North Unit Hoepker Rd North-East Park Cherokee Park 151 Cherokee Marsh-South Unft Welson Rd Mendota 113 Burke Warner Park Maple Bluff Country Club Seminar County Road T Springs Milwaukee St Door Oreek Park Olbrich Park Cottage Grove Rd ВВ Brokeye Rd Study Boundary Percent Minority Population including Hispanic or Latino Quarter Mile Buffer
Half Mile Buffer Less than 10% 2 Miles Municipal Boundaries 10 - 19% 20 - 40% 40 - 60% Above 60%

Figure 5: US 51 (Stoughton Road) North: Percent Minority Population

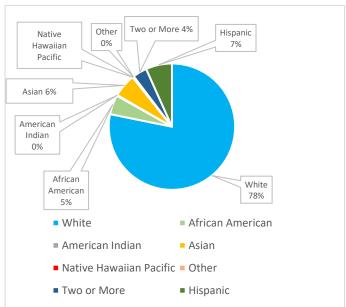
4.3.3. Minority Population Breakdown

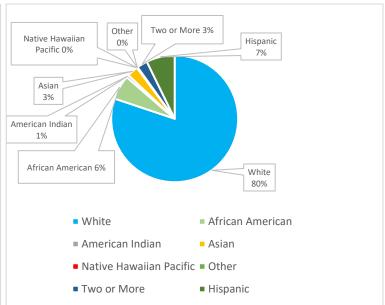
Figure 6 illustrates the breakdown of race location in the study boundary, 0.25-mile buffer boundary and 0.5-mile buffer boundary around the study area boundary. Race and ethnic groups mapped include the following: Hispanic, African American, Two or More Races and Asian. American Indian, Native Hawaiian Pacific Islander and Other races are not depicted due to their population making up less than 0.5% of the study area population.

Figure 6: Minority Breakdown



Study Boundary 0.25-Mile Boundary 0.5-Mile Boundary





Dane County

State of Wisconsin

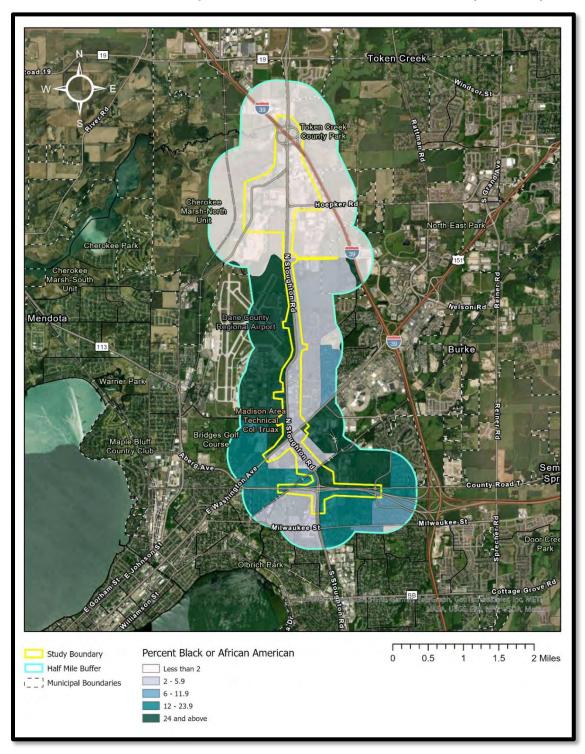
The 0.5-mile buffer boundary is utilized for community breakdowns throughout this plan as populations within the 0.5-mile buffer boundary are likely users of the US 51 study corridor. Within the 0.5-mile buffer boundary of the US 51 study corridor, minorities made up about 35% of the population in 2021. The greatest population of minorities identify as African American (13.2%) followed by Hispanic (12.4%), Two or More Races (5.2%) and Asian (3.6%). Less than 0.5% of the population is Native Hawaiian Pacific, American Indian, or Other.

Below is a summary, using ACS 2021 census data, on the location of minority populations within 0.5-mile buffer as seen on **Figures 7 – 10**.

- There is a high percentage of African Americans living west of the corridor between E Washington Ave and Hoepker Road and also east of the corridor between WIS 30 and E Washington Ave. Less than 2 percent of the population is African American north of the Dane County Regional Airport.
- A moderate percentage of Hispanics live east of the corridor between E. Washington Ave and Hanson Rd.
 There is also a high percentage of Hispanic population in the census block from north of E Washington Ave to Anderson St. west of US 51.
- Populations that identify as two or more races are scattered in the southern portion of the corridor area, south of Hoepker Rd.
- Asian populations are scattered throughout the 0.5-mile buffer around the study area boundary.

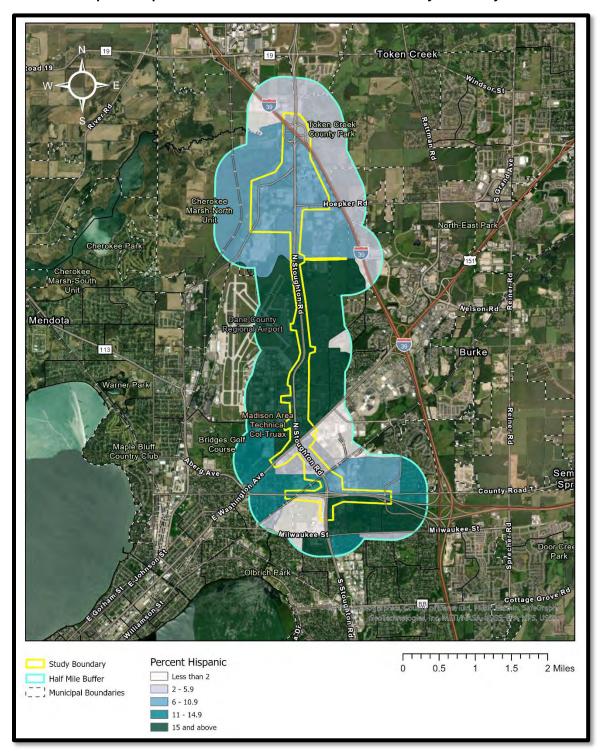
4.3.4. African American Population

Figure 7: Percent African American Population Within 0.5-Mile Buffer Around Study Boundary



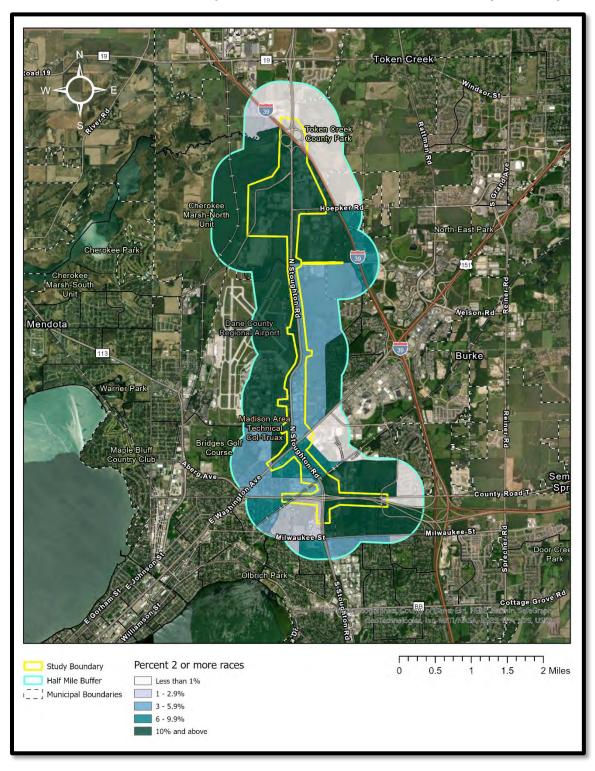
4.3.5. Hispanic Population

Figure 8: Percent Hispanic Population Within 0.5-Mile Buffer Around Study Boundary



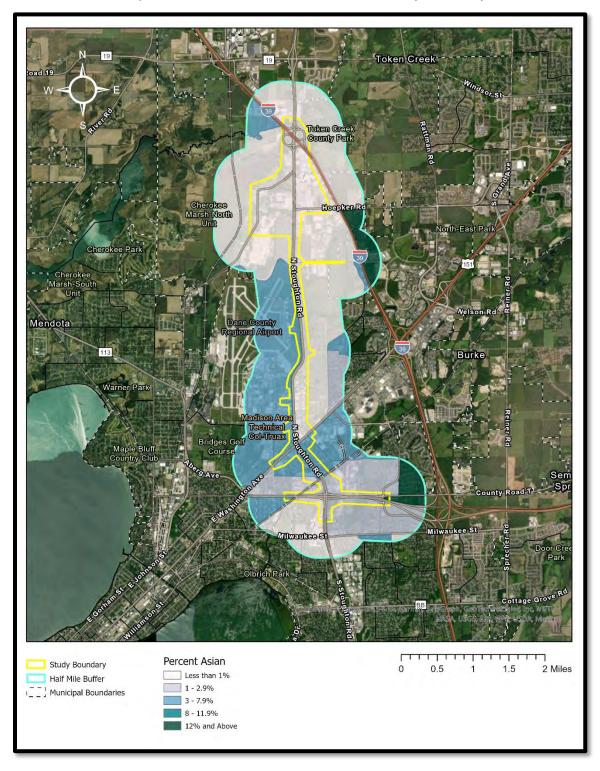
4.3.6. Two or More Races Population

Figure 9: Percent Two or More Races Population Within 0.5-Mile Buffer Around Study Boundary



4.3.7. Asian Population

Figure 10: Percent Asian Population Within 0.5-Mile Buffer Around Study Boundary



4.4. Low-Income Populations

Two indicators of low-income populations were analyzed in full because they directly account for income level or poverty in a given area. They include:

- Median Household Income
- Poverty

Several other indicators of low-income populations were analyzed to supplement the above indicators. These supplemental indicators demonstrate characteristics of low-income populations without specifically accounting for income level or poverty. They include:

- Families receiving public income assistance
- Families below poverty level
- Immigrant populations
- Household characteristics
- Transportation
- · Persons with disabilities
- Housing Characteristics
- Educational Attainment

Data for low-income indicators is provided at the census tract level. The census tract is the smallest geographical entity for which income data is collected. Low-income indicator data was collected from the 2021 ACS 5-year estimates, where applicable.

4.4.1. Median Household Income

The median household income within the 0.5-mile buffer boundary of the corridor is \$61,185. **2** below depicts median household income levels for the study boundary, 0.25-mile boundary, 0.5-mile boundary, Dane County and the state of Wisconsin. The median household income within the 0.5-mile boundary is less than the median household income for the state of Wisconsin (by ~\$6,000) and Dane County (by ~\$16,036). **Figure 11** illustrates the median household income within the study corridor.

Table 2: Median	Household Income	(USD)
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	Study Boundary		0.5-Mile Boundary	Dane County	State of Wisconsin
Median Household Income	\$ 61,713	\$ 59,862	\$ 61,185	\$ 77,221	\$ 67,125

Lake Windsor 19 Token Creek 19 State Road 19 Windsor St Cherckee Marsh-Iorii Unit North-East Park Cherokee Park 151 -Cherokee Marsh-South Unit Welson Rd a Mendota 113 Burke Warner Park Maple Bluff Country Club Seminary County Road T Springs E Wash Door Greek Park Olbrich Park E Buckeye Rd Median Household Income Study Boundary 0 - 35,000 2 Miles Quarter Mile Buffer 35,001 - 60,000 Half Mile Buffer 60,001 - 85,000 Census Tract/Block Group Boundaries 85,001 - 120,000 Municipal Boundaries 120,001 - 250,000

120,001 - 250,000

*2021 ACS Median household income data missing. Estimated based on 2018-2020

Median Household Income data. 35,000 - 60,000*

Figure 11: US 51 (Stoughton Road) North, Median Household Income

4.4.2. Poverty

The U.S. Department of Health and Human Services (HHS) annually publishes poverty guidelines to determine financial eligibility for certain programs. The HHS guidelines are a simplification of the U.S. Census Bureau's poverty thresholds for use for administrative purposes; for instance, determining financial eligibility for certain federal programs. According to the HHS guideline, in 2021 a household containing four persons was considered to be living in poverty if the total income of the family was less than \$26,500. By comparison, in 2021, the U.S. Census Bureau set the poverty threshold for the same family of four to a total family income of less than \$27,479 (U.S. Census Bureau 2022). The Census Bureau's Poverty Guidelines were used for this analysis.

Table 3 depicts number persons in poverty for the study boundary, 0.25-mile boundary, 0.5-mile boundary, Dane County and the state of Wisconsin. The percentage of the population in poverty in each of the study boundaries is slightly higher than the Dane County and state average.

Table 3: Population Demographics, Percent of Persons in Poverty

	Study E	Boundary	0.25-M Bound		0.5-Mile Bounda	-	Dane Co	unty	State of Wi	sconsin
	Count	%	Count	%	Count	%	Count	%	Count	%
Population	1,240	100.0%	4,041	100.0%	7,099	100.0%	236,036	100.0%	2,401,818	100.0%
Poverty	165	13.3%	521	12.9%	885	12.5%	23,523	10.0%	251,251	10.7%

Figure 12 illustrates where persons below the poverty level are located within the study corridor. The highest rates of poverty are scattered throughout the southern portion of the study area.

⁹ Income data is collected by the American Community Survey (ACS) in the year preceding the U.S. Census Bureau publication. The ACS tracks local economic conditions annually rather than on a decennial basis like the U.S. Census. The U.S. Department of Health and Human Services (HHS) annually publishes poverty guidelines to determine financial eligibility for certain programs. The HS guidelines are a simplification of the U.S. Census Bureau's poverty thresholds for use for administrative purposes; for instance, determining financial eligibility for certain federal programs. According to the HHS guideline, in 2021 a household containing four persons was considered to be living in poverty if the total income of the family was less than \$26,500.

19 Token Creek Whidson 80-Token Oreek County Perk Hoepker Rd Oherdree Marsh-Florth Unt 1 [51] Choops or Re North-Bast Park Cherokee Park Cherokee Mersh-South Unit Medecon Rd Dame County Regional Alipert ndota 113 Burke Warner Park Madisun Area Bridges Co Course Maple Bluff Country Qu ABOND AVO E Westerd to Day County Road T Milwankee St Milwauk e St Dog ERE, Garmin, **Gerego (Cros)** . USGS, PPA-NPS, USDA Study Boundary

Quarter Mile Buffer Percent of Persons in Poverty Less than 10% 2 Miles 10.1 - 20% Half Mile Buffer _ | Municipal Boundaries

Figure 12: Persons Below Poverty Level in US 51 (Stoughton Road) North

5.0 Outreach

As outreach efforts are conducted, study materials will be translated to include populations with Limited English proficiency as appropriate. A breakdown of languages spoken within a 0.5-mile buffer of the study area are identified in **Table 4**. **Figure 13** identifies locations of Limited English Proficiency (LEP) populations. ¹⁰ Preliminary coordination with community organizations identified below in **Table 5**, as well as others identified throughout study development will help inform the study team on translation needs prior to outreach events.

Outreach on the US 51 (Stoughton Road) North Study area will be ongoing. Preliminary groups and stakeholders have been identified in **Table 5**, **Table 6** and **Table 7** below; this is a living list and will be updated throughout the duration of the study. Study staff will contact and arrange to meet with identified stakeholders to inform them of the study, solicit information and input on the study and to equip them with information regarding upcoming public involvement meetings and other opportunities to provide input about the study.

Table 4: Language Proficiency (Population Who Speak English Less Than "Very Well")

Population	Count	Percent of Population
Spanish	559	3.82%
Indo European	39	0.27%
Asian Pacific Island	140	0.96%
Other	12	0.08%

Source: American Community Survey, 2017-2021 5-Year Data, U.S. Census Bureau

A voluntary survey will be utilized to collect information specific to participants demographics. A hard copy version of the survey will be available at outreach meetings, a postage paid envelope will be provided for return following the meeting. The survey will also be available digitally. Participants will have an opportunity to scan a QR code to provide information via their mobile device. Devices will be available at public involvement meetings for individuals to utilize if they do not have their own device available.

Vital public involvement meeting materials will be translated to both Hmong and Spanish. The language list will be expanded if necessary to engage populations as outreach to community organizations occurs throughout study development. It will also be expanded if a request is received from the public prior to a public involvement meeting. Hmong and Spanish speaking interpreters will be available during public involvement meetings for the study.

Post-meeting follow-up will include database additions for mailed and electronic newsletters to keep everyone informed of the study status and timeline.

¹⁰ Executive Order 13166

2021 ACS 5-Year ⊐ Miles Population Who Speak English Less than "Very Well" 0.5 2 Study Boundary Less than 1% Half-Mile Buffer 1% - 4.9% □ Municipal Boundaries = 5% - 9.9% ■ 10% and above

Figure 13: Limited English Proficiency (Population Who Speak English Less Than "Very Well")

Table 5: Community Organization Outreach

Organization	Address	Name	Contact
Greater Madison Chamber of Commerce	1 S Pinckney St., Suite 330, Madison, WI 53701	Zach Brandon	608-433-1946 zach@madisonbiz.com
Madison Black Chamber of Commerce	2222 S. Park St., Madison, WI 53713	Camille Carter	608-729-1238 madisonblackchamber.com
Wisconsin Latino Chamber of Commerce	PO Box 259851, Madison, WI 53725-9851	Johnathan Delgado	608-712-3522 ext. 1002 info@lccwi.org
Hispanic Chamber of Commerce	1021 W. National Ave., Milwaukee, WI 53204		414-643-6963 hccwtoday@hccw.org
NAACP	PO BOX 44366, Madison, WI 53744	Gregory Jones	naacp36ab@gmail.com
Latino Health Coalition	PO BOX 731, Madison, WI 53701		
Hmong Chamber of Commerce	2881 Commerce Park Dr., Fitchburg, WI 53719	Maysee Her	414-645-8828
Hmong Institute	4402 Femrite Drive, Madison, WI 53716	Peng Her	608-628-3901 Peng.her@thehmonginstitute.org
Wisconsin Tibetan Association	1502 Parkside Drive, Madison, WI 53714		608-285-2098 wistibculturalcenter@gmail.com
Victory Hmong Alliance Church	602 Acewood Boulevard, Madison, WI 53714		608-224-1646 Victoryhmongwi@gmail.com
Madison Housing Authority	215 Martin Luther King Jr Blvd #161, Madison, WI 53703	Larry Kilmer	(608) 264-2305 Ikilmer@cityofmadison.com
Dane County Housing Authority	6000 Gisholt Dr #203, Monona, WI 53713	Karyn Knaak	608-224-3636 ext 023 kknaak@dcha.net
Access To Independence, Inc.	3810 Milwaukee Street, Madison, WI 53714	Jason Beloungy	608-242-8484 Info@accestoind.org jasonb@accesstoind.org
Catholic Charities	702 South High Point Road, Madison, WI 53719	James Debilzen	608-826-8000 ccharities@ccmadison.org

Catholic Multicultural Center	1862 Beld Street,	Andy Russell	608-441-3248
wulticultural Center	Madison, WI 53713		andy@cmcmadison.org
Centro Hispano-	810 West Badger Road,	Karen	608-255-3018
Madison	Madison, WI 53713	Menendez Coller	info@micentro.org
Area Agency on	2865 N. Sherman Ave.,	Sridevi Mohan	608-261-9930
Aging - Dane County Human Services	Madison, WI 53704		thoni@co.dane.wi.us
African Association of Madison	P.O. Box 1016, Madison, WI 53701-1016	Ray A. Kumapayi	raykumapayi@gmail.com
Northside Planning	1219 North Sherman	Justin	608-204-7015
Council	Avenue, Madison, WI 53704	Markofski	director@northsideplanningcouncil.org
Outreach LGBTQ+	2701 International Lane,	Steve Sarkey	steves@lgbtoutreach.org
Community Center	Madison, WI 53704		608-255-8582
Asian Wisconzine	303 Whispering Pines Way, Fitchburg, WI 53713	Heidi Pascual	Heidipascual2016@yahoo.com
African Center for	6314 Odana Road,	Aliko Songolo	608-5292-0066
Community Development	Madison, WI 53719	-	info@africancentermadison.org
Community Action	4101 E Towne Blvd,	Amber Duddy	608-237-1255
Coalition	Madison, WI 53704		cac@cacscw.org
Joining Forces for	9 Straubel Court,	Michael Bruce	608-335-7817
Families – Dane County	Madison, WI 53704		bruce@countyofdane.com
Senegambia	1921 Northport Dr #5,		608-298-7720
Women's Association	Madison, WI 53704		info@harambeevillage.org
Harambee Village	2423 American Lane,	Tia Murray	608-298-7720
Doulas	Madison, WI 53704		tia@harmbeevillage.org
Families Back to the Table	2001 Zeier Road, Madison, WI 53704	Lisa Burrell	608-209-5114
City of Madison	214 MLK Jr Blvd. 3rd	Jim O'Keefe	608-266-6520
Community Development Office	Floor Madison, WI 53703	2	jokeefe@cityofmadison.com
City of Madison	210 MLK Jr Blvd. #523	Norman D.	608-266-4910
Department of Civil Rights	Madison, WI 53703	Davis	Ndavis@cityofmadison.com

Coalition of	210 MLK Jr Blvd.,	Jean Erickson	608-224-0606
Wisconsin Aging Groups	Madison, WI 53703	Joan Enongon	jerickson@cwag.org
Community	1137 N. Sherman Ave.,	Caitlin Cahill	608-620-3010
Support Network, Inc.	Madison, WI 53704		info@VisitCSN.org
Dane County Veterans Service	1709 Aberg Ave. Suite 2	Daniel	608-266-4158
veterans Service	Madison, WI 53704	Connery	connery@countyofdane.com
East Madison Community Center	8 Stauble Ct., Madison, WI 52704	Tom Moen	tmoen@eastmadisoncc.org
Elder Care of Dane	2865 N. Sherman Ave.,	Jennifer	608-240-7460
County, Inc.	Madison, WI 53704	Fischer	fischer@countyofdane.com
Family Support	101 Nob Hill Rd. Suite	Heidi Rossiter	608-237-7630
Resource Center	201, Madison, WI 53713		hrossiter@fscrdane.org
Goodman	149 Waubesa St.,	Latesha	608-241-1574
Community Center	Madison, WI 53704	Nelson	latesha@goodmancenter.org
Jewish Social	6434 Enterprise Ln.,	Kai Yael	608-504-6435
Services	Madison, WI 53719	Gardner Mishlove	kmishlove@jssmadison.org
Latino Academy of Workforce Development	1917 Lake Point Dr., Madison, WI 53713	Carlos Arenas	carlos@latinoacademywisconsin.org
Madison Asian American Business Association	5130 Door Dr., Madison, WI 53705	Aek Ksharty	
Madison Area Chinese Community Organization	23 Ellis Potter Court, Madison, WI 53713		info@madisonchinese.org
Madison Disability Rights & Services Program	210 MLK Jr. Blvd., Madison, WI 53703	Jason Glozier	jglozier@cityofmadison.com
Madison Senior	330 W. Mifflin St.,	Karen Cator	608-266-6290
Center	Madison, WI 53703		seniorcenter@cityofmadison.com
Meister Special Care Transporter	2330 Vondron Rd., Madison, WI 53718	Ron Meister	608-240-0353
Philippine-	PO Box 5013,		608-850-6922
American Association of Madison	Madison, WI 53705		Panama.madison@gmail.com

Project Home –	1966 S. Stoughton Rd.,	Denise	608-246-3737
Madison	Madison, WI 53705	Matyka	outreach@projecthomewi.org
REM Wisconsin III,	2005 W Beltline Hwy	Veronica	608-276-0102
Inc.	Suite 100, Madison, WI 53713	Brown	veronica.brown@SevitaHealth.com
Teamwork	822 Gannon Ave,	Beth Hougen	608-442-8785
Associates Inc.	Madison, WI 53714		beth@teamworkdane.org
The Salvation Army	630 East Washington	Melissa	608-250-2237
	Ave., Madison, WI 53701	Sorensen	Melissa.Sorensen@usc.salvationarmy.org
United Refugee	2132 Fordem Ave.,	Koua Vang	608-256-6400
Services of Wisconsin, Inc.	Madison, WI 53704		kouavang@tds.com
Urban League of	2222 S Park St STE 200,	Ruben L. Anthony, Jr.	608-729-1200
Greater Madison (ULCM)	Madison, WI 53713		info@ulgm.org
Wisconsin Council of the Blind and Visually Impaired	754 Williamson St., Madison, WI 53703	Bob Jacobson	BJacobson@WCBlind.org
YMCA Madison	101 E. Mifflin St.,	Vanessa	608-664-9622
	Madison, WI 53703	McDowell	vmcdowell@ymcamadison.org

Table 6: Neighborhood Association/Municipal Outreach

Neighborhood Association	Location	Name	Contact
Eastmorland Community Association	South of WIS-30, west of corridor	Emily Mixon	emilyemixon@gmail.com
Burke Heights Neighborhood Association	North of WIS-30, east of corridor	Kerry McAllen, Jessi Alter	kmcallen@uwalumni.com jessialter@gmail.com
Mayfair Park Neighborhood	Between Burk Heights Neighborhood and US 151, east of corridor	Hilton Jones	hmjones3@gmail.com
Carpenter- Ridgeway Neighborhood Association	North of US 151, west of corridor	Diane Newlin, Bonnie Melahn	carpenterridgeway@gmail.com ettak7@gmail.com
Truax Neighborhood Association	Between Straubel St and Anderson St, west of corridor	Pat Hadden Chris Hadden	jeffan90@yahoo.com
Town of Burke	Northern Half of study area	PJ Lentz	608-825-8420 Clerk@TownofBurke.com
Village of DeForest	Northern sliver of study area	Calli Lundgren	lundgrenc@vi.deforest.wi.us

Table 7: Business Outreach

Organization	Address	Name	Contact
JX Truck Center	4205 Anderson Rd., Madison, WI 53704	Bud Struntz	608-241-4101 bstruntz@jxe.com
Lakeside International	7243 Manufacturers Dr., Madison, WI 53704	Bill Reilley	608-246-5860 wreilley@lakesidetrucks.com
Skillrud LLC	3585 E. Washington Ave., Madison, WI 53704	John Skillrud	johnskillrud@gmail.com
Wisconsin Aviation	3606 Corben Ct., Madison, WI 53704	Rick Petroff	608-268-5000 rickp@WisAV.com
Fed Ex Ground	3700 Kinsman Blvd., Madison, WI 53704	John Bruer	608-241-5441 jbruere@fedex.com

TA Travel Center	5901 US 51,	Tanya Haigler	608-249-9000
	DeForest, WI 53532		THAIGLER@TA-PETRO.COM
Madison Block and Stone	5813 US Hwy 51, Madison, WI 53704	Jayme Anderson	608-249-5633
			janderson@madisonblockandstone.com
Labcorp Drug	3402 Kinsman Blvd., Madison, WI 53704	Bryan Lawlis	608-442-8200
Development - Madison			participate@labcorp.com
Kwik Trip Corporate	1626 Oak St PO Box 2107, La Crosse, WI 54601	Troy Mleziva	608-792-7443
			TMleziva@kwiktrip.com
Zimbrick of Madison	1601 W Beltline Hwy., Madison, WI 53714	Tom Zimbrick	608-241-5201
			Tom.zimbrick@zimbrick.com
Zimbrick of Madison	1601 W Beltline Hwy., Madison, WI 53714	Bill Schmitz	bill.schmitz@zimbrick.com
Bell Laboratories	3699 Kinsman Blvd., Madison, WI 53704	Sara Knilans	sknilans@belllabs.com
Walmart	ılmart 4198 Nakoosa Trail, James		608-241-8808
Supercenter	Madison, WI 53714	Hanson	james.hanson@walmart.com
County Materials Corporation	3275 Lexington Ave., Madison, WI 53714	Phil Nowak	608-244-1381
			philip.nowak@countymaterials.com
County Materials	3275 Lexington Ave., Madison, WI 53714	Marc Olson	608-244-1381
Corporation			marc.olson@countymaterials.com
		·	

July 2023

6.0 Environmental Justice Staff Resources

Table 8 lists the individuals involved with implementing the Environmental Justice Plan for the US 51 (Stoughton Road) North study:

Table 8: Environmental Justice Staff Resources

Staff	Title	
Jeff Berens, WisDOT	Project Manager	
Mike Helmrick, WisDOT	BTS NEPA Liaison	
Joel Brown, CDMCT*, HNTB Corporation	Section Manager, Environmental Planning	
Ashley Schulze, AECOM	Project Manager	

^{*}Corridor Design Management and Controls Team

7.0 Timelines, Activities and Deliverables

Findings in this preliminary assessment will inform the decision-making process in considering potential effects of the identified alternatives and inform the study team of community issues and concerns.

Initial deliverables drawn from the assessment include, but are not limited to, the deliverables shown in Table 9.

Table 9: Timeline and Deliverables

Deliverables	Timeline	
Public Involvement Plan/update	August 2022/Ongoing	
Conduct Preliminary Outreach (Public Involvement Meeting #1)	October 2022	
Conduct Outreach (Public Involvement Meeting #2 and #3)	Fall 2023 and Spring 2024	
Conduct final outreach to disseminate findings of study (preferred alternative) to community through availability of Environmental Assessment (EA)	Fall 2024	
Stakeholder Database Development	Ongoing	
Media Coordination	Ongoing	
Meeting Handouts and Collateral Materials	Ongoing	

8.0 Tentative Methods of Evaluation of Environmental Justice Plan Effectiveness

- Conduct periodic checks of study status against established deliverables schedule listed in section 7 above
- Conduct public surveys at various times and hold diverse outreach meetings including, small group and online meetings
- Develop clear and measurable goals for the number of meetings, number of stakeholders added to mailing list, number of inquiries and response to inquiries.
- Evaluate comments and requests provided by minority and low-income groups and stakeholders as alternatives are developed