

From: [Brodzeller, James](#)
To: [Von Holdt, Crystal L - DNR](#)
Subject: RE: Epic mitigation
Date: Friday, May 17, 2024 12:45:05 PM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[Dane Co LWRD Public Comments_Epic W River Rd Proposal.pdf](#)

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Hi Crystal,

Our comment letter is attached. Thanks in advance for your consideration.

I'll keep you apprised of our work with Epic/AECOM environmental on amendments to the river restoration design.



James Brodzeller

Watershed Coordinator

5201 Fen Oak Drive #208, Madison, WI 53718

Cell: (608) 212-5011 | [website](#)



From: Von Holdt, Crystal L - DNR <Crystal.VonHoldt@wisconsin.gov>
Sent: Wednesday, May 15, 2024 1:25 PM
To: Brodzeller, James <Brodzeller.James@danecounty.gov>
Subject: RE: Epic mitigation

Hi James,

I am happy to receive comments through end of day on May 19th!

We are committed to service excellence.

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

Crystal vonHoldt

[Pronouns: she/her]

Phone: (920) 410-3181

Crystal.vonHoldt@wisconsin.gov

From: Brodzeller, James <Brodzeller.James@danecounty.gov>
Sent: Wednesday, May 15, 2024 12:11 PM
To: Von Holdt, Crystal L - DNR <Crystal.VonHoldt@wisconsin.gov>
Subject: RE: Epic mitigation

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Thanks for the info, Crystal. Just to confirm, if we submit comments by close of business on the 19th they'll still be considered? Or do they need to be submitted by the 18th?



James Brodzeller
Watershed Coordinator

5201 Fen Oak Drive #208, Madison, WI 53718

Cell: (608) 212-5011 | [website](#)



From: Von Holdt, Crystal L - DNR <Crystal.VonHoldt@wisconsin.gov>
Sent: Wednesday, May 15, 2024 7:29 AM
To: Brodzeller, James <Brodzeller.James@danecounty.gov>
Subject: RE: Epic mitigation

Good morning James,

Thanks for reaching out! It is always good to reconnect with our partners – inside and outside the agency! I have attached the email recently sent to Epic with details of what is to be purchased for fulfilling the state's wetland compensatory wetland mitigation requirement. I appreciate your question as it reminded me to upload this into the public record so you can now find it within the public record and viewable online at

<https://permits.dnr.wi.gov/water/SitePages/DocSetView.aspx?DocSet=WP-IP-SC-2024-13-X02-29T09-12-36&Loc=undefined>.

And yes!! I started a few weeks ago in Kyle's vacated position for Policy Coordinator but am still taking care of some workload from my previous role among various other workload needs our program has due to understaffing. Feel free to reach out anytime you have questions but please remember if you have any additional comments to submit for the Epic project public comment period, it ends on May 19th.

Thank you!

We are committed to service excellence.

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

Crystal vonHoldt

[Pronouns: she/her]

Waterways Program Policy Coordinator

Division of External Services

Wisconsin Department of Natural Resources

2984 Shawano Avenue, Green Bay WI 54313-6727

Phone: (920) 410-3181

Crystal.vonHoldt@wisconsin.gov



dnr.wi.gov



From: Brodzeller, James Brodzeller.James@danecounty.gov
Sent: Friday, May 10, 2024 4:36 PM
To: Von Holdt, Crystal L - DNR Crystal.VonHoldt@wisconsin.gov

Subject: Epic mitigation

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Hi Crystal,

Glad we could connect last night at the Epic hearing, always nice to chat. Could you send me that email from Army Corps with the mitigation/credit purchase breakdown? Just out of personal curiosity, not ammunition 😊.

I see your title changed in the staff directory. Did you take McLaughlin's old position? If so, congrats on the new gig.

Hope all's well off the clock.



James Brodzeller

Watershed Coordinator

5201 Fen Oak Drive #208, Madison, WI 53718

Cell: (608) 212-5011 | [website](#)



Sent Securely via TLS from County of Dane by **Proofpoint**

Sent Securely via TLS from County of Dane by **Proofpoint**

Sent Securely via TLS from County of Dane by **Proofpoint**

May 17, 2024

Wisconsin Department of Natural Resources
C/O Crystal Von Holdt
2984 Shawano Ave
Green Bay, WI 54313-6727
[sent electronically]

Dear Ms. Von Holdt:

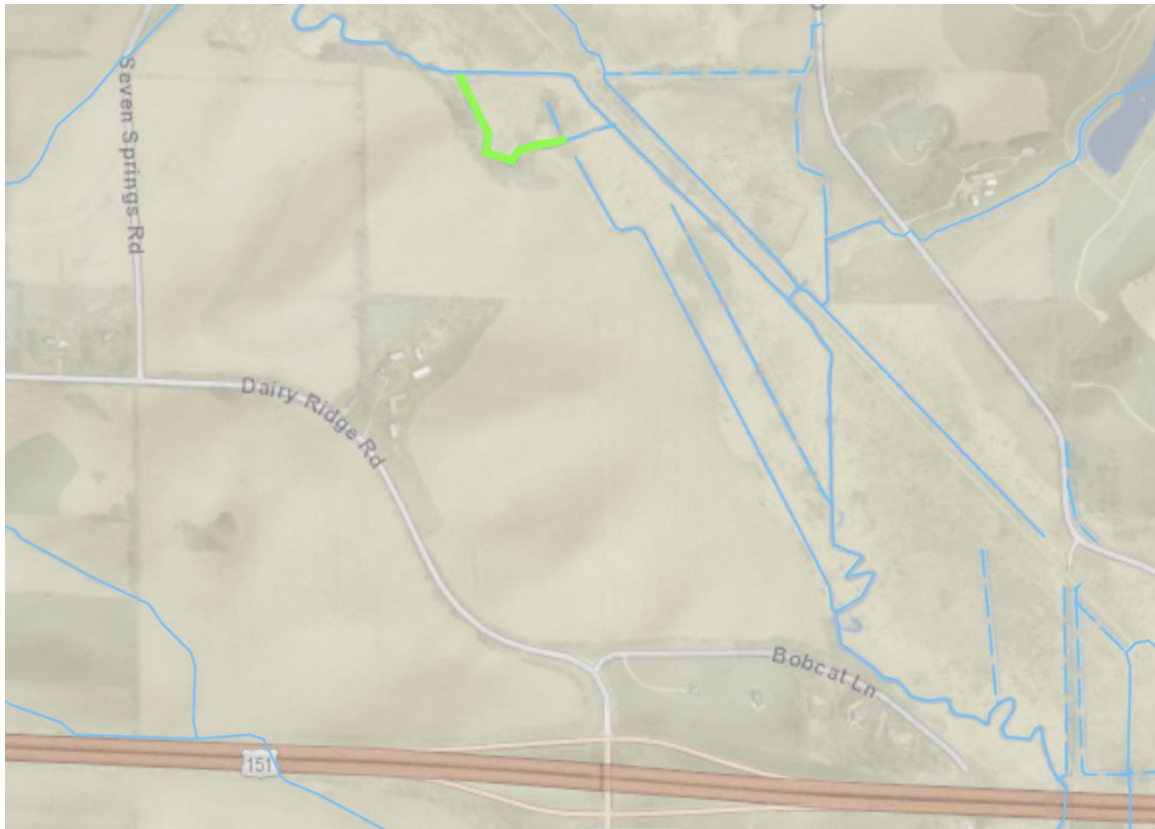
On behalf of the Dane County Land & Water Resources Department (LWRD), we appreciate the opportunity to provide comments on Epic System Corporation's proposed wetland fill for the West River Road project and restoration of the Upper Sugar River (IP-SC-2024-13-00581, 00582, and 00583). We acknowledge the Department's diligent review of the proposal and encourage strong consideration of the following. The recommendations stem from a cohort of local natural resource practitioners, including LWRD staff, who have been working collectively with the Upper Sugar River Watershed Association for many years to monitor and inform restoration throughout the watershed.

This section of the Sugar River valley is a well-known, long-monitored and publicly-important natural resource area in terms of the river itself and surrounding wetlands. The Upper Sugar River has been and continues to be a cold-water success story with respect to the rebounded fishery and water quality. The reach from Valley Rd up to Bobcat Ln houses the best trout fishery in the entire system according to data from a [2021 DNR Fisheries report](#) in terms of natural reproduction and angler-preferred sized fish. There have been multiple documented occurrences of endangered/threatened/special concern flora and fauna, such as the Blanding's turtle (*Emydoidea blandingii*). Despite historic development from the railroad and ongoing expansion of the Epic campus, areas of high-quality sedge meadow/fen remnants remain in that part of the river valley.

While LWRD shares concerns about the potential forecasted and unforeseen environmental, aesthetic and public use impacts from the proposed road/bridge, we understand DNR's limited authority and duty to follow rules in applicable statutes and administrative code. Cognizant of those limitations and for the reasons highlighted above, in addition to the project being adjacent to the Sugar River Wildlife Area (owned and managed by Dane County), LWRD focuses advisement on the following protective measures to be incorporated into the plans or as conditions of any issued permits:

Stormwater Controls. Do not allow drains/culverts through the bike trail bed that convey water from north to south. The trail bed has been protecting (for 170 years) the few remaining high-quality wetlands on the southwest side of the trail from sediment/nutrient laden runoff from uplands to the north, while the river intercepts agricultural runoff from the south and west.

Utilize Relic River Channel. Subsurface exploration performed by Fish Creek Restoration in 2021 revealed the abandoned river channel highlighted in green below as the only section of the valley with firm, coarse substrate (gravel) from the river's historic flow paths. The channel realignment should reactivate this section of river to re-expose this native channel material. Coarse substrate provides ideal spawning and egg incubation habitat for trout, as well as being the preferred conditions for macroinvertebrate production, which are important for ecological health of a river system and the primary food source for trout. There are also substantial springs/groundwater discharge points along the western edge of the valley at that location. Shifting the proposed channel realignment into this historic meander would reintroduce a nearly direct input of groundwater to the river to help buffer rising water temperatures that pose a threat to water quality and life cycles of trout and other cold-water species.



Optimize Natural Materials and Natural, Dynamic Features. Lunker structures as proposed undoubtedly provide overhead cover for adult trout, but haven't been used in Wisconsin stream restorations for many years after observing equal or better success with alternative large wood practices like root wads. In addition to fish habitat, root wads also provide better bank stability and erosion control with a large portion of the structure being keyed into the bank. Replacing lunker structures with alternative large wood practices is recommended.

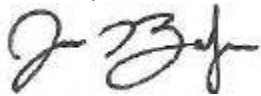
In an effort to mimic natural processes in this section of the river, based on downstream reference reaches, meanders could be tightened at some locations and sinuosity increased to induce undercut banks, another preferred holding area for trout. The well-connected floodplain and dense vegetation/root structure in riparian wetlands allows undercut banks to form and stay in place, and would add habitat diversity.

Off-Channel Wetlands and Channel Form Diversity. Inclusion of adjacent wetland features like scrapes and ephemeral ponds with large wood or micro-topography aid flood abatement, provide refugia for aquatic species during overbank flows and serve as habitat for amphibians, waterfowl and migratory birds. These features should be strategically integrated into the restoration with these ecosystem services in mind, and can be constructed in areas of invasive/undesirable vegetation to improve floristic quality. Opportunities also exist to expand diversity of the channel in terms of pool depth, width depth ratio, riffle characteristics, pool-to-pool spacing and other physical attributes to promote robust river evolution.

Woody Vegetation Control. While some portions of the wetlands within and adjacent to the river corridor slated for restoration have a natural tree/shrub component, areas such as the sedge meadow remnant immediately southwest of the Military Ridge Trail would benefit from removal of undesirable trees/shrubs and recurring use of prescribed fire.

In closing, LWRD commends Epic for the voluntary addition of the river restoration as part of mitigating impacts from the proposed roadway infrastructure, but feels more can be done to maximize the environmental and public benefits from the overall project.

Sincerely,

A handwritten signature in black ink, appearing to read 'J Brodzeller', written in a cursive style.

James Brodzeller
Watershed Coordinator

From: tuckinky@bellsouth.net
To: [Von Holdt, Crystal L - DNR](#)
Subject: Public Comments for 00581 00582 00583
Date: Friday, May 17, 2024 3:45:28 PM
Attachments: [Public Comment 00581 00582 00583.pdf](#)

**CAUTION: This email originated from outside the organization.
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Crystal,
Please find attached our public comment for the Sugar River bridge in Verona.
If you have any questions or the document does not open correctly, please let me know.
Thank you.
Jo Tucker
tuckinky@bellsouth.net

Date: May 17, 2024
To: STATE OF WISCONSIN DEPARTMENT OF NATURAL RESOURCES
Attention: Crystal Von Holdt, via email
Subject: Public Comment
Wetland Impacts, Stream Realignment, and Waterway Crossing
Docket Numbers IP-SC-2024-13-00581, 00582, and 00583

The purpose of this letter is to comment on the Epic-proposed bridge over the Sugar River and its wetlands in the Town of Verona. I oppose the application and believe DNR should not approve it:

1. The application was submitted by Epic Systems Corporation as landowner. The proof of ownership document indicates existing roadways in the area are not owned by Epic and the Military Ridge State Trail is owned by DNR. Ownership of the MRST by DNR implies ownership by the citizens of Wisconsin. Who speaks for the citizens? The public hearing attendees spoke overwhelmingly against this project.
2. The Military Ridge State Trail will be directly and substantially affected by this project. It's one thing to have underpasses for the 18/151 expressway near Verona, but to add an obstruction of the now-unimpeded view in the area will significantly degrade the MRST experience. Organizations which publish information about the MRST use descriptions like, "the route journeys through the open countryside of the Upper Sugar River Watershed." The Alternative Analysis Section 4.1 is wrong when it says the "arch bridge will provide a visually appealing profile to adjacent landowners and users of the sugar River and MRST." On this point alone, the permit should be denied.
3. The Sugar River valley is one of the most beautiful and significant natural resources in this area. The State should serve as a steward of the river valley, not participate in its development, especially when that development serves only the interests of a private corporation.
4. The Alternatives Analysis was insufficient and based on a selection of alternatives that did not include many other possibilities, including those that would serve the purpose of avoiding wetland impacts and being more sustainable. This road/bridge project is a major impact proposed only to facilitate Epic expansion and get Epic employees to work with less wait time. Many other alternatives could have been analyzed, including mass transit, ride-sharing, staggered work shifts, remote work, park and ride, and combinations of the above. Those of us who live in the area and have been adversely affected by the constant expansion and associated traffic observe that most vehicles carry only one occupant. Epic has the clout to change this.
5. A major project designed to serve the interests of a private corporation, especially when it affects public and protected lands, should be subject to a regional review for numerous impacts like:
 - a. Dark sky protection: vehicle lights, street lights, and brightly lit buildings have already degraded the night sky; we should work to improve this, not degrade it further.
 - b. Habitat destruction and division: the Sugar River is a bird haven and wildlife corridor, which will surely be affected by the road and bridge.
 - c. Noise pollution
 - d. Viewshed destruction
6. The public hearing conducted by DNR was insufficient. The stated purposes (DNR letter to Epic dated April 12, 2024) were to "gather additional facts to help gauge the possible environmental impacts" and "be a public informational hearing where members of the public can learn more

about the proposed activity." The information presented at the hearing was so brief and incomplete that no informed opinion could be made; several commenters at the meeting expressed concerns about this. Sending people to the DNR website to review the multitudes of documents there was a cop-out; something informative should have been presented at the hearing.

Jo and Herman Tucker
3020 Shady Oak Lane
Verona, WI 53593
608.845.7876

From: [Southern Wisconsin Trout Unlimited](#)
To: [Von Holdt, Crystal L - DNR](#)
Cc: [Topf Wells](#); stevemusser@msn.com; henry.nehlslowe
Subject: Comments on Epic Corporation's Pending Application to Fill Wetlands and Restore the Sugar River
Date: Saturday, May 18, 2024 5:35:41 AM
Attachments: [SWTU Comments on Sugar River, Epic Proposed Bridge Wetland Work, 05 18 2024.pdf](#)

**CAUTION: This email originated from outside the organization.
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Dear Ms. Von Holdt,

Please accept the attached comments from the Southern Wisconsin Chapter of Trout Unlimited (SWTU) regarding the Epic Corporation's request to fill wetlands and restore the Sugar River, in Dane County, Wisconsin (IP-SC-2024-13-00581, 00582, 00583).

Sincerely,
Henry Nehls-Lowe, Secretary
Southern Wisconsin Chapter of Trout Unlimited



May 18, 2024

Crystal VonHoldt
Waterways Program Policy Coordinator
Division of External Services
Wisconsin Department of Natural Resources
2984 Shawano Avenue, Green Bay WI 54313-6727

Dear Ms. Von Holdt,

Please accept these comments from the Southern Wisconsin Chapter of Trout Unlimited (SWTU) regarding the Epic Corporation's request to fill wetlands and restore the Sugar River (IP-SC-2024-13-00581, 00582, 00583).

While SWTU appreciates the dynamic role Epic plays in our local economy, respects Epic's environmental ethic, and acknowledges the DNR's careful review of the project, we believe that Epic's proposal to build a road and bridge in this wetland and over the Sugar River has not received as full a review and the opportunity for public comment as it should have. Moreover, Epic's proposed mitigation and restoration are inadequate.

By way of background, SWTU has a long history in helping to preserve, protect, and improve the Sugar River. Over the last 10-15 years we have raised over \$50,000 dollars and volunteered hundreds of hours to restore key segments of the river in Dane County's Davidson, Falk-Wells, and Basco Wildlife properties along the river. In addition, we have contributed thousands of dollars and dozens of hours to similar projects on Badger Mill Creek, a key tributary of the Sugar. Besides work on the stream itself we have supported and directly worked to improve such habitats as prairies and oak savannas, including the extensive and difficult removal of invasive vegetation. We have done so because the Sugar River is an excellent and improving trout fishery with good public access in Wisconsin's most rapidly growing metropolitan area. Our projects have also improved public access to the river for walkers and paddlers.

We respectfully submit that Epic's project should be the subject of an Environmental Impact Statement. If approved without adequate delineation and analysis of alternatives, approval would set a bad precedent for other projects in this area with large disruptions of wetlands. The river and surrounding wetlands are critical natural resources in a rapidly urbanizing county. While some of the wetlands are degraded, they still serve important functions. Some are extremely high quality and deserve the highest degree of protection. All should be the subject of an intense and publicly available analysis to ensure that any harm is avoided or limited to the greatest possible degree. Finally, as should have become apparent at the hearing,

the public has not had a sufficient opportunity to learn about and comment on this proposal. Taken individually or collectively, these factors call for the DNR to conduct an EIS.

Several expert conservationists, conservation organizations, and Dane County have reviewed this proposal and its mitigation and restoration measures diligently and offered thoughtful, detailed suggestions for improving those practices. SWTU strongly supports those suggestions and respectfully asks that, if the DNR issues a permit for this project, it will incorporate those as permit conditions.

More specifically, SWTU recommends and requests:

Stream restoration should avoid the use of LUNKERs and employ techniques involving the use of natural materials such as wood and brush and bank shaping. These are key features of DNR stream restorations over the last 5 or so years.

Access of the stream to its floodplain should be improved wherever possible, again an important component of the state of the art stream restorations in southern Wisconsin.

While re-meandering the stream is commendable, that work should restore the stream to its original meanders and channels whenever possible. Doing so will re-create the best possible habitat for trout and other aquatic life.

The high quality sedge meadow should be afforded absolute protection.

Finally, Epic proposes to improve public access for one class of river users, paddlers. SWTU supports that improvement. Epic should, however, improve access to anglers, birders, and hikers by granting or selling a permanent, public access easement along the Sugar River. We don't know if the DNR can include that as a permit condition. If it cannot, it can certainly urge Epic to provide such access. Doing so would complement the years of effort and millions of dollars spent by Dane County, the DNR (via the Stewardship Program), and conservation organizations including SWTU to make the Sugar River accessible to and enjoyable by the public. Such an action would also be a much appreciated act of good faith to the public on the part of Epic.

Thank you for your consideration of these requests.

Sincerely,



Henry Nehls-Lowe, Secretary
Southern Wisconsin Chapter of Trout Unlimited
swisconsintu@gmail.com

cc: Steve Musser, President, SWTU
Topf Wells, Vice-President, SWTU

From: [D&K Wolf](#)
To: [Von Holdt, Crystal L - DNR](#)
Subject: IP-SC-2024-13-00581, 00582, and 00583 Epic Wetland Bridge
Date: Saturday, May 18, 2024 10:27:14 AM

**CAUTION: This email originated from outside the organization.
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Good Morning

Earlier in January I had contact with you, via email, regarding the placement of a bridge over the wetlands west of Verona in conjunction with a connector road to Country View from Dairy Ridge Road.

Due to a family emergency in Texas I was unable to be part of the public meeting a week ago in the Town of Verona.

According to recent information it appears the DNR has already approved the destruction of our wetland so the only thing remaining issue is the location of the bridge.

I discovered that there are two options as to the location. As this connector will be a major route from the Hwy G and 18/151 interchange I would hope that the route chosen would be the southern route which places the bridge closer to the main interchange. This would provide a safer and more manageable route for heavy traffic. Also, it would divert traffic from a residential area which is located on Dairy Ridge Road and Seven Springs which is where the other planned routes would be located.

Any help you can provide towards the location of the bridge providing a safer and speedier connector route as opposed to a scenic drive through the country side would be appreciated. This connector will have heavy traffic not only by Epic employees but also the general public trying to get from Hwy G to Hwy PD.

I apologize for the late response.

Thank you for your time and consideration regarding this matter.

Douglas Wolf

7822 Dairy Ridge Road
Verona, WI 53593

From: [R Bouffler](#)
To: [Von Holdt, Crystal L - DNR](#)
Subject: Proposed bridge over Sugar River
Date: Saturday, May 18, 2024 4:47:24 PM

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Hello Crystal,

I want to voice my main concern and why I oppose Epic's proposed 4 lane bridge over the Sugar River in Verona.

The community of Verona and surrounding areas, users of our beautiful and treasured Sugar River and precious wildlife are not being considered with this proposal. The ONLY beneficiary of this proposal is Epic and its employees!

My question to the DNR is, how can you justify compromising the health, safety and peace of the Sugar River when this proposal when it is not serving the greater good?

Regards,
Rachel Bouffler
2753 Prairie Circle
Verona

Sent from my iPhone

From: [Henry Mongrain](#)
To: [Von Holdt, Crystal L - DNR](#)
Subject: Epic Systems bridge comment
Date: Saturday, May 18, 2024 6:28:29 PM

**CAUTION: This email originated from outside the organization.
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Ms. Von Holdt,

I am writing to you to share my comments on Epic Systems' project to construct a four-lane bridge near the Upper Sugar River. As an Epic employee and public transit commuter, I encourage Epic and the Wisconsin government to invest in lower-impact methods of transportation such as bus rapid transit and light rail before moving forward with this large and potentially environmentally damaging project that caters to the needs of single occupancy automobiles. Expanding car infrastructure will only encourage more private vehicle use, eventually eliminating any benefits from increased capacity.

I urge you to discourage this project and collaborate with Epic to develop less destructive long-term alternatives.

Thank you,

Mr. Henry Mongrain, E.I.T.
(he/him/his)

From: [Sam Nush](#)
To: [Von Holdt, Crystal L - DNR](#)
Subject: Concern for wetlands area
Date: Sunday, May 19, 2024 8:47:25 AM

**CAUTION: This email originated from outside the organization.
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hello,

I am an avid bicyclist living in Blue Mounds. I saw [channel 15's story](#) on the new 4 lane bridge set to be constructed in Verona. I bike from Blue Mounds to Madison almost weekly, and that portion of the military ridge state trail is by far the most beautiful in the entire route. Without fail, I always see cranes, deer, turtle, or other creatures right off the trail, and it is always my favorite section to ride through. Just last week, I saw three deer right where that proposed bridge is going to go. The rest of military ridge state trail is great, but you are always close enough to homes, roads, or fencing that you don't really see wildlife anywhere else. I think the new bridge is going to destroy the best part of the trail. Wildlife is not going to stick around with this construction, and riding the bike trail will forever be a worse experience for it.

Coincidentally, I also work at Epic, which is the requesting company for the bridge. I would rather we maintain the wetlands than build more roads for campus. I just wanted to share my thoughts before the comment period ended.

Thank you for protecting Wisconsin's dwindling wetlands!

Sam Johnson

From: [Adam Maus](#)
To: [Von Holdt, Crystal L - DNR](#)
Subject: Public comment by Friends of Military Ridge Trail on Epic Systems Corp., Sugar River Crossing, Project # IP-SC-2024-13-00581, 00582, and 00583
Date: Sunday, May 19, 2024 3:11:23 PM
Attachments: [FMRT-public-comment-epic-bridge-2024.pdf](#)

**CAUTION: This email originated from outside the organization.
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Dear Crystal,

I am attaching a public comment on behalf of the Friends of Military Ridge Trail.

If you have any trouble opening the attached PDF, you can also find it on the Friends' website at: <https://www.friendsofmilitaryridgetrail.org/uploads/6/1/3/5/61359193/fmrt-public-comment-epic-bridge-2024.pdf>

Thank you,
Adam Maus



FRIENDS OF MILITARY RIDGE TRAIL

PO Box 373, Mt. Horeb WI 53572
info@friendsofmilitaryridgetrail.org
www.FriendsofMilitaryRidgeTrail.org
A volunteer, non-profit, non-stock organization



Dear Committee,

We of the Friends of the Military Ridge State Trail would like to submit the following public comment on the proposed bridge project proposed by Epic over the Military Ridge State Trail, the Sugar River, and wetland in the Sugar River Valley.

We first became aware that the project had reached a stage where decisions would be made on the permitting on 4/24/24 when Nathan Lockwood of D'Onofrio Kottke and Associates emailed us the letter about the public hearing on 5/9/24. A few members attended the hearing and reported the information shared at our monthly meeting.

Overall, the group has been disappointed by the lack of clarity on the project and details on the alternatives considered. Our organization caters to over 200,000 trail users annually and is an indirect stakeholder in this project but we cannot in good conscience make a decision for or against this project since we have not been provided adequate information on it.

We would hope that the Department of Natural Resources takes this comment as a sign that there are many others in this position and that the public needs more time and information to understand why this bridge is the single best option. Epic Systems could do more to embrace a partnership with the Department and impacted stakeholders to find a solution that will benefit everyone.

We thank you for your time and consideration.

Jerry Wilson
President, Friends of Military Ridge State Trail
info@friendsofmilitaryridgetrail.org

From: [mike engel](#)
To: [Von Holdt, Crystal L - DNR](#)
Subject: IP-SC-2024-13-00581, 00582, and 00583
Date: Sunday, May 19, 2024 3:49:57 PM
Attachments: [Engel Comments for Epic Sugar River Wetland IP.pdf](#)

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Please see attached comments for these IPs.

Wisconsin Department of Natural Resources

C/O Crystal Von Holdt

2984 Shawano Ave

Green Bay, WI 54313-6727

Crystal.VonHoldt@wisconsin.gov

Thank you for the opportunity to comment on Individual Permits (IP-SC-2024-13-00581, 00582, and 00583). I have extensively topographically surveyed, walked, biked, and canoed the project reach.

The *Sugar-Pecatonica State of the Basin Report* published by the Wisconsin DNR mentions non-point source pollution, habitat improvement, streambank protection, and the restoration of riparian wetlands (pages 5-10). The report also identifies increased water-based recreational opportunities as an objective. This property ranks 7 out of 9 for the 2020 WI Waterfowl Management Plan. It is located within the Southwest Grassland Project Area, and is in the High Potential Zone for the federally endangered Rusty Patch Bumble Bee.

This project comes during a time of incredible momentum on the Sugar River. Restoration projects and easement purchases are happening on the Sugar River including the county purchased wildlife areas Basco Unit, Falk Wells, Davidson Unit, and Reiner Unit. All of these projects are happening within six miles of the Epic property. This project would be arguably the largest piece of the restoration puzzle on the Sugar River in terms of size and scope.

Should the DNR be approving a 30% conceptual plan for an individual permit that will be a large fill of wetlands in a high quality riparian and wetland area? It makes me very uncomfortable that 70% of the critical details of the projects are not available. A 30% plan is typical to generate cost estimates and communicate with stakeholders. It is not a construction plan. Can the DNR require a 60%, 90% or final plan in order to issue the permit?

Questions that remain for me are:

- Will all 1.5 miles of legacy agricultural ditches be filled to restore wetland hydrology?
- Will crop fields owned by Epic in wetlands or adjacent be planted to permanent cover or at least an adequate buffer to reduce erosion and runoff to the wetlands and streams?
- Will oxbow and off channel wetlands be created to provide habitat for herptiles, dragonflies, and other wildlife?
- Will there be access points for Epic employees to enjoy the area?
- Will there be access points for the public to enjoy the area?
- Can the riparian restoration plan be revised to reflect local knowledge and most up to date restoration techniques? More simply can the DNR Surface Water Grant findings

from 2020 on this reach by multiple stakeholders be more fully incorporated into this plan?

- Can the dead-end of Country View Rd to the Military Ridge Trail be removed as part of this project? It would restore wetland by removing fill and reconnect floodplain. Steve Dickman retired Epic Chief Operating Officer proposed this idea to me when we first met to discuss restoring wetlands on Epic's campus.
- What plans and commitment is there to manage, maintain, and continue to restore the sedge meadow wetland? The site is already in need of fire to discourage invasive trees, shrubs, and Reed canary grass. This large scale disturbance could unbalance the remaining native plant community. Without a strong commitment to maintaining and improving this area it is at great risk of losing its many substantial rare and declining resources.
- The plan to use live stakes in the restoration is completely inconsistent with sedge meadow mitigation or restoration. We do not want shrubs for the health of the sedge meadow, fishing, or boating.
- LUNKERs are a relict technique that need to be removed. They should be replaced with more natural and dynamic materials like root wads.
- The riparian plan mentions Rosgen and Natural Channel Design, but these techniques do not fit a glaciated WI stream. I encourage the use of USGS Dr. Faith Fitzpatrick's work with Wisconsin streams for bankfull. The new channel in the 30% plan seems arbitrary. I highly recommend using the 30% plans submitted by the local conservation team for the 2020 WI DNR Surface Water Grant. These plans used geomorphology, survey data, and historic aerial imagery to more appropriately restore the channel.
- Has or will this project be reviewed in the context of compliance with the Wisconsin Environmental Policy Act (WEPA) and National Environmental Policy Act? The scale and quality of the site merits more than a standard checklist.
- The best location for stream restoration is the preferred bridge location. Shifting the bridge location and/or hosting a design charrette to try to include this historic channel with springs and gravel is badly needed. Ignoring this area is like replacing a 300 year old oak with a two year old nursery stock. Our creations are never as good as natural conditions.

Mike Engel

Biologist

Mik3eng3l@gmail.com

From: [Josh Brown](#)
To: [Von Holdt, Crystal L - DNR](#)
Cc: kelly.r.maynard@gmail.com
Subject: Josh Brown comments on Epic Road Project
Date: Sunday, May 19, 2024 8:53:59 PM
Attachments: [Josh Brown Epic Road Project Comments.pdf](#)

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Hi Crystal,

Attached are my comments for the Epic Road Project. Please let me know any questions and thanks for considering!

Also, is it possible to remove the "comments" you uploaded from me on 5/6? I did not mean for those to be public comments. If they have to be left in the record because I asked you the questions, ok, but they weren't meant to be 'official' comments. This attachment is my comments.

Thanks!
Josh

Hello Crystal,

These comments are in reference to IP#SC-2024-13-00581, -00582, and -00583 related to Epic's new road project. First, I want to acknowledge Epic's willingness to not only complete compensatory wetland mitigation as part of the regulatory process, but also put parts of the Sugar River back into its original channel. My comments here focus on Epic completing more engagement with local experts in order to most minimize impacts and complete the best river and wetland restoration possible. Specific experts I'm referring to include The Prairie Enthusiasts (TPE), Trout Unlimited, US Fish and Wildlife Service, Upper Sugar River Watershed Association, Dane County Land and Water Resources Department, Fish Creek Restoration LLC, and DNR staff from the State Natural Areas, Fisheries, Wildlife and Wetlands programs. I feel that this additional engagement should focus on the following topics:

1. New Road/Bridge Location – Based on comments from TPE and Dane County, it appears that high quality wetland and hydrologic resources could be located to the north and west of Alternative 3.1. TPE Board Member Rich Henderson stated in his #2 comment dated April 26 “There is an intact, high quality sedge meadow/fen/wet prairie wetland complex located 100 yds. NW of the proposed crossing of the floodplain.” In his #3 comment Rich also states “Where the floodplain meets the upland on the SW side where the proposed bridge crossing is shown to start, that whole area has ground water seeps and springs.”

According to Dane County's comment “Subsurface exploration...revealed the abandoned river channel highlighted in green below as the only section of the valley with firm, coarse substrate (gravel) from the river's historic flow paths.” Also “There are also substantial springs/groundwater discharge points along the western edge of the valley at that location.” This green is located just to the north of the west end of Alternative 3.1.

Because of the two above comments, Epic should engage with the local experts mentioned above to consider if Alternatives 2 or 3.2 would cause less damage to the remaining wetlands and result in an improved river restoration. If the experts do recommend Alternatives 2 or 3.2 they should be strongly consider, if they do result in slightly more wetland impact acreage.

2. River Restoration – AECOM's “Sugar River Design Report” appears to use somewhat “old fashioned” restoration techniques that use static features that don't optimize river/floodplain interaction and function. Field surveys dating back to 2021 were completed to inform a possible river restoration before this road project existed. The data from those previous surveys should be reviewed with the local experts that completed the 2021 work to determine the most beneficial river restoration locations and techniques.
3. Wetland Restoration – In addition the river restoration, there is also an immense opportunity to restore wetland hydrology (to the extent possible) around the road project. In the below image, drainage ditches are shown in red which were dug to artificially drain these wetlands for farming. All of these ditches are located on Epic or public property. Epic should again engage with the abovementioned local experts to evaluate the potential for additional hydrologic restoration of the remaining wetlands as part of the road project and river restoration. With

equipment already on site, filling these ditches could provide an efficient and large amount of benefit to the remaining wetlands.



By engaging local experts on the topics above, the development project and restorations can be designed to provide a functional new road for Epic and complete valuable wetland and river restorations which most-minimize the impacts to the Sugar River, its wetlands and watershed, and the Verona community.

Thanks for considering,

Josh Brown

From: [Cheryl Matzinger](#)
To: [Von Holdt, Crystal L - DNR](#)
Subject: Epic Systems bridge construction
Date: Sunday, May 19, 2024 11:11:32 PM

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I'm responding to the proposed 4-lane bridge construction which will pass over the wetlands area, the sugar river & the Military Ridge Bike trail. I was appalled to think that this amazing nature area would be scarred by such a roadway. I've biked this path for over 30 years, specifically enjoying the undisturbed wetland area.

Surely, other options can be found. For example, establish off site parking with shuttle service. I've worked at both SSM Health & Dean Clinics which both used off site parking and/or shuttle service. Likewise, I've worked at UW Hospital as well as on the UW campus which also deal with less than ideal traffic & survive nonetheless.

My husband and I both oppose the current plan.

Cheryl & Martin Matzinger
10 Manchester Court
Madison, WI 53719

Our new address, beginning June 13 will be:
1263 Wild Willow Way
Verona, WI 53593

Sent from my iPad