

From: [Jim Schumacher](#)
To: [Kovacevich, Caree C CIV USARMY CEMVP \(USA\)](#); [Von Holdt, Crystal L - DNR](#); mcdavid.alaina@epa.gov
Cc: [Isaac Schrock](#); [Bliesner, Brian](#); [Billmeyer, Jess](#)
Subject: MVP=2004-0035-CCK, Epic Systems Corporation
Date: Thursday, May 9, 2024 7:17:04 AM
Attachments: [12040873_env.pdf](#)
[Epic response to EPA comment_20240508.docx](#)
[240509 US Army Corp response Signature page.pdf](#)

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

All, please find Epic Response to your inquiry.

Allie McDavid your contact for meeting availability is Isaac Schrock ischrock@epic.com

Jim Schumacher

Epic Facilities

jschumac@epic.com

m608-209-1777

d608-777-0118



U.S. Army Corps of Engineers
St. Paul District
ATTN: Caree Kovacevich
332 Minnesota Street, Suite E1500
St. Paul, Minnesota 55101

Re: MVP=2024-0035-CCK, Epic Systems Corporation

Dear Ms. Kovacevich,

Thank you for forwarding the April 29, 2024, letter from the U.S Environmental Protection Agency (EPA) regarding the subject project. We understand that both US Army Corps of Engineers (USCOE) and EPA play an important role in protecting the waters of the United States. We appreciate the opportunity to respond to EPA's comments and clarify the work done to date. Epic prioritizes the environment and part of our company's responsibility is to protect the valuable natural resources within our site. This project will allow Epic to continue to be successful and will be a net benefit to the Sugar River watershed.

We believe many of the issues identified in the EPA letter are a result of the project still being early in the design process. Our experience on other projects affecting the environment is that as the design plans evolve the requested details will become available.

This permit application covers three distinct actions. First, is the roadway/bridge work that addresses a specific traffic and safety need. Second is a buried casing crossing that provides for future utilities. Lastly, the permit covers the restoration of the Sugar River that re-meanders a channelized section from the early 1900's. Submitting these together will ensure stream alignment construction is coordinated, by tying it to the roadway crossing aspect of the project and not in a separate project or application. Restoring the stream is a voluntary effort above and beyond any required roadway wetland impact mitigation and is not being proposed for compensatory mitigation related to any impacts of the roadway project or for the establishment of a stream mitigation bank.

The stream restoration component can be seen in Alternative 3.2 Exhibit 3.2-3 in the Alternatives Analysis_00581_00582_00583.pdf.

Compensatory mitigation for impacts related to the roadway crossing and utility corridors are being achieved by wetland bank credits. Details on these impacts can be found:

- Roadway crossing (Alternative 3.2 Exhibit 3.2-5 between dashed black line)
- Utility corridors (Alternative 3.2 Exhibit 3.2-4)

The project team is coordinating with the WDNR on which wetland bank these credits will be purchased from. The mitigation table for these aspects of the project are provided under the email on the WDNR website:

- RE_ Please review_ Compiled mitigation table - Epic wetland impacts.msg.

More details on the purpose of the restoration can be found in the Practicable Alternative Analysis (PAA) document (Alternative Analysis_ River Crossing_00581_00582_00583.pdf).

Note all references are the file names found on the WDNR Permit application website:

[WDNR Permit Link](#)

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

For the very specific concerns in the EPA letter, we have identified and numbered each specific issue followed by our detailed response. After each numbered issue we included text from the EPA letter that further clarifies the requested action.

Issue 1 Direct Impacts

404 applications contain information about project design/details on their location within aquatic resource.

- **provide more detailed construction plans showing the work within Sugar River, including the location and quantity of rip rap as well as proposed BMPs and sediment and erosion controls.**
- **provide a map that more clearly depicts the areas of disturbance and their associated aquatic resource impacts.**

RESPONSE:

The plans submitted are at a 30% level. Detailed erosion control and BMP implementation is typically added to the plans at 90% design. We will be using the design development process to refine our impacts and listen to feedback from the resource agencies and implement recommendations whenever possible. The submitted preliminary structure plans have detail on the riprap limits adjacent to each bridge pier and within the Sugar River. The stream realignment plan shows the BMP concepts and areas of disturbance.

1. Roadway Plans – Plans and Specifications_00581_00582_00583.pdf
2. Structure Plans – Bridge Plans_00581_00582_00583.pdf
3. Stream Realignment – Sugar River Stream Realignment_00581_00582_00583.pdf
4. Stream Restoration Design Report – Stream Restoration Design_00581_00582_00583.pdf

The areas of disturbance shown are a conservative approach at the 30% design level. Our goal is to further reduce the disturbance area as design progresses. The reasoning for submitting 30% plans for this permit application is to obtain approval for the crossing location of the trail and river. This decision is important for the design outside of the floodplain/wetland areas.

Issue 2 Secondary Impacts

Impacts to an aquatic ecosystem associated with the discharge of dredged or fill material, but do not result from the actual placement of the dredged or fill material.

- **discuss and account for potential secondary impacts to the Sugar River, its adjacent wetlands, and the Sugar River Wildlife Area from the proposed work.**

RESPONSE:

Roadway Crossing

As mentioned, this project is still in the early stages of design and exact locations of stockpiles are not yet determined. However, the stockpiles will be stored outside of the wetland/floodplain area and will have erosion control practices (i.e., silt fence or erosion logs) established along all downstream sides of the stockpile to prevent sediment export in aquatic resources. Stockpiles in place for longer than 14 days will either be temporarily seeded, or a polymer soil stabilizer will be applied to the stockpile. Material that is excavated as part of the bridge crossing shall be hauled offsite to be used as fill for the road section outside of the wetlands and floodplain.

The stormwater best management practices (BMPs) will be installed outside of the wetland/floodplain area. Stormwater conveyance features such as grassed swales, filter strips, and storm sewer will be used to limit the amount of wetland disturbance to route water to treatment. The BMPs and any discharge into the wetland area will be designed to provide water quality control before discharging into the protective area of the wetland. Thermal control will be provided via grassed swales, infiltration basins, or rock cribs before entering the wetlands.

Visible flagging or markings will be provided to indicate the areas of temporary or permanent disturbance as defined by the project to ensure construction is kept within these limits.

Stream Restoration/Realignment

In relation to the voluntary restoration of the Sugar River, a restoration process has been proposed to reduce and control ecosystem impacts associated with excavated/dredged materials. A new, relocated channel will be excavated in winter to avoid watershed flows and stabilized with various bank treatments and vegetation restoration methods. These details can be found:

- Sheet PD-SR-01 of the "Sugar River Stream Realignment_00581_00582_00583.pdf"
- Described on pages 5-11 and 5-12 of the "Stream Restoration Design_00581_00582_00583.pdf"

Cut materials will be stored outside of the floodplain areas where erosion control practices will be established to prevent sediment export in aquatic resources. These locations are shown:

- Sheet EC-SR-01 of the "Sugar River Stream Realignment_00581_00582_00583.pdf"

During this period, the existing, active channel will remain untouched. After at least one full growing season of plant root establishment and bank treatment settling, upstream channel flows will be routed into the new channel and the old, channelized segment will be backfilled and restored back to the wetland area it was prior to the early 1900's channelization of the river.

More details of both aspects of the project can be found in the project narrative (Project Narrative_00581_00582_00583.pdf) and the PAA document.

Issue 3 Cumulative Impacts

Changes in an aquatic ecosystem attributable to the collective effect of a number of individual discharges of dredged or fill material.

-evaluate how the proposed project, in conjunction with previous, current, and future operations within the watershed, may affect the physical, chemical, and biological integrity of adjacent and downstream aquatic resources including the Sugar River.

RESPONSE:

The Wisconsin Department of Transportation (WisDOT) projects along USH 18/151 completed an environmental document, showing the environmental commitments to be provided. Please see attached PDF (12040873_env.pdf) for this document.

An effort was made to minimize future cumulative impacts to the extent possible. This includes installing steel casing pipes for potential future sanitary sewer and watermain lines now when areas are disturbed instead of a second disturbance in the future. As noted in the PAA document two installation methods were identified and discussed. The PAA represents the more conservative approach. This permit request is only for the impacts occurring now and the limits shown in the PAA. Any future development (e.g. buildings) would need the associated permit approval at the time of implementation.

Issue 4 Avoidance and Minimization

Applicant has not demonstrated that the project proposed is the LEDPA.

Verona Ave Interchange

- **provide additional information to support their assertion that Alternative 1 would not provide the necessary traffic capacity.**
- **discuss other ways to design the West Verona Avenue interchange that may alleviate traffic concerns, including adding additional north/south lanes or a median U-turn crossover.**
- **review the Federal Highway Administration's *Signalized Intersections: Informational Guide (2004)* to help determine the most efficient design for the US 18/151 and West Verona Avenue intersection.**

RESPONSE:

Extensive traffic analysis has been performed for this area. This includes specific analysis at Verona Interchange with US 18/151. This location, the main entrance from the freeway to the Epic site, has experienced significant operational and safety issues. With the potential for continued Epic growth, the Verona Ave Interchange was identified as a major concern.

The design team completed a comprehensive alternative development process that developed numerous concepts that were vetted and screened using a robust engineering analysis. Alternative 1 as designed included a two-lane exit at the US 18/151 & W. Verona Avenue interchange. Northbound traffic would use two free-flow lanes through a tunnel under Verona Avenue. By providing a tunnel under the current intersection, traffic would avoid a significant capacity constraint. Even with the free-flow movement, significant operational and safety concerns remain or are created. The tunnel's capacity and therefore Alternative 1 is limited by the traffic volumes entering via the existing 2-lane freeway. The safety concerns of the tunnel alternative included tight geometry forcing difficult merging movements and continued long queues that extended onto the freeway.

Other intersection concepts were explored but none could provide the safety and operations needed to handle the peak hour traffic volumes attributed to 25,000 employees. Some of the problems identified included safety concerns from downstream merging/weaving, limited capacity of highways feeding the interchange, and queuing of traffic resulting in back-ups on high-speed US 18/151. More discussion of the safety concerns of US 18/151 queue backup can be found in the PAA document.

The primary conclusion from this process was that a second access point from USH 18/151 to the Epic campus is needed. Creating a second access point from US 18/151 would alleviate the bottle neck at the W. Verona Avenue interchange and improve the safety of the transportation network.

The traffic capacity and safety needs for the secondary access point were coordinated with WisDOT, Dane County, and the City of Verona.

Alternative Bridge Designs

- **explore an alternative that lengthens the proposed bridge to avoid impacting these wetland areas. Should consider the cost of mitigation for impacts to aquatic resources compared to any additional construction costs due to this new alternative.**

RESPONSE:

Clear spanning the entire river and floodplain is not feasible. The floodplain is about 1300 feet wide. This is longer than the longest spans on Golden Gate bridge. PAA permanent impacts include any impacts to the wetland from shading under the structure. Because of this, lengthening the bridge or changing the structure type to try to span the wetlands/floodplains would not reduce permanent impacts as currently calculated. A girder bridge would reduce the number of piers in the wetland but would not reduce the shaded structure area. In reviewing the structure types, the precast arch option had lower overall lifecycle cost, which did not add any additional shaded area underneath the structure. The precast arch option width of the opening is wide enough to accommodate the stream's main channel. In addition, the precast arch option would have an open bottom as showed in the bridge plans (Bridge Plans_00581_00582_00583.pdf). The stream restoration portion of the project will provide ecological functional lift of the Sugar River related to hydraulics, geomorphology, physiochemistry and biology.

Offsite Alternatives

- **provide offsite alternatives and describe each alternative and details why each site is not feasible as part of a revised alternatives analysis.**

RESPONSE:

Offsite locations remote to Verona do not meet Epic's needs. We develop software to help people get well, help people stay well, and help future generations stay healthier. More than 305 million patients currently have a record in Epic. Our software makes it possible for each of those patients to have a single, comprehensive medical record that informs and is informed by their health experiences. The goal is higher quality, more personalized care that's simpler for patients, medical professionals, and everyone who makes healthcare happen.

The development of our software, with those goals in mind, requires frequent in-person collaboration to ensure the best outcomes. Locating staff in remote locations to Verona would reduce the ability to collaborate effectively and could negatively impact outcomes as a result.

Epic has invested significantly in the Verona area. In addition to the land we have purchased, we have also dedicated many improvements to the City and State without asking for any public contribution. Improvements include state highways, county highways, city roads, town roads, sanitary lift stations, city wells, water/sanitary infrastructure, dedication of land for future city parks, and much more. These dedications were made in good faith to our city, recognizing how our growth can impact the community.

They were also made with growth of Epic in mind through close collaboration with the City and County. Offsite locations would not make use of the significant resources Epic has already invested in Verona in anticipation of our continued growth.

Epic hosts many events throughout the year. We all gather monthly as an entire company for an event called 'home day' where we focus on our corporate goals and mission. We also host visitors, trainees, and guests at our Verona campus daily – there could be 1,000 visitors on any given day. Those visitors will always be destined for our Verona campus and will continue to grow. We host two large healthcare conferences annually – XGM and UGM – where upwards of 7,000 additional visitors join us in Verona to collaborate and improve healthcare. Those conferences will always be hosted at our Verona campus.

Issue 5 Compensatory Mitigation

Mitigation plan is lacking sufficient detail

- **provide a plan that complies with subpart J of the Guidelines**
- **propose credit ratios for permanent impacts and provide a rationale for the mitigation ratios proposed**
- **provide a complete mitigation plan and include it as part of a revised 404 Application for review by the Agencies**

Need for realignment of portion of Sugar River is unclear/no formal mitigation plan is included

- **justify the need for the extent of stream impacts proposed. If these stream impacts are needed to fulfill the overall project purpose, the EPA recommends the Applicant consider compensatory stream mitigation**
- **review the *St. Paul District Stream Mitigation Procedures* when determining the appropriate compensatory stream mitigation needed to offset impacts to the Sugar River.**

RESPONSE:

Wetland Mitigation Summary forms were completed for both the roadway/bridge crossing and the south utility crossing. The roadway/bridge crossing mitigation information was completed within the WDNR online ePermitting webpage while the south utility crossing had a separate mitigation form attached to the application. WDNR staff compiled a table of wetland impacts and is using the confirmed numbers for permit and mitigation documents (for credit purchase).

Both Wetland Mitigation Summary forms indicated that the proposed compensatory mitigation to be done by a mitigation bank credit purchase. The ratios for both permanent and temporary impacts are determined by WDNR. The complete mitigation plan is compiled by the WDNR and has not been provided yet.

WDNR References:

1. <https://dnr.wisconsin.gov/sites/default/files/topic/Wetlands/WetlandCompensatoryMitigationGuidelines.pdf>
2. <https://dnr.wisconsin.gov/topic/Wetlands/mitigation/bankingRegistry.html>

Using the WDNR Permit link previously mentioned, the following documents can be referenced.

1. Copy of the WDNR online ePermitting webpage form: WRAPP_00581_00582_00583.pdf
2. South utility crossing mitigation form: Mitigation Summary Form_00581_00582_00583.pdf
3. Exhibits documenting the wetland impacts: Alternatives Analysis_00581_00582_00583.pdf

4. Email correspondence with WDNR on permit and mitigation documents: RE_ Please review_ Compiled mitigation table - Epic wetland impacts.msg

The voluntary Sugar River Restoration element of work is a comprehensive restoration of the hydrologic, hydraulic, and geomorphic ecological functions for this trout stream. The sole need for this work is for the ecological restoration of historic impacts to the Sugar River. It is not related to mitigation of any roadway/bridge crossing impacts to wetlands in any way. We are proposing this work for the sake of ecological restoration to be performed at similar time of the roadway crossing to minimize the construction related impacts.

Again, we appreciate the opportunity to respond to these issues. We hope that this spirit of cooperation can continue as we work together to make this a successful project. We would appreciate the chance to meet with the USCOE and EPA to better explain and discuss the analysis done on this project. We suggest including WisDNR, Dane County, and the City of Verona in this meeting. A virtual meeting in the next few weeks would be the most effective way to ensure that EPA's comments are addressed and determine if any analysis is missing. Please contact Isaac Schrock (Epic) regarding a follow-up meeting. He can be reached at ischrock@epic.com or 608-777-2094.

Sincerely,

Epic

James S Schumacher
Senior Director of Facilities

If you have any questions regarding these comments, please contact Allie McDavid at mcdavid.alaina@epa.gov or 312-886-7236.

Enclosure: WisDOT Environmental Document ("12040873_env.pdf")

CC: Crystal vonHoldt (Crystal.vonHoldt@wisconsin.gov)

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Sincerely,

Epic



James S Schumacher
Senior Director of Facilities

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Enclosure: WisDOT Environmental Document ("12040873_env.pdf")

CC: Crystal vonHoldt (Crystal.vonHoldt@wisconsin.gov)

Categorical Exclusion Checklist (CEC)

04-05-2023

Wisconsin Department of Transportation

Project Summary

Project Design ID 1204-08-03	Project Route or Facility US 18/151	Funding Sources (<i>check all that apply</i>) <input type="checkbox"/> Federal <input checked="" type="checkbox"/> State <input checked="" type="checkbox"/> Local
Construction ID 1204-08-73/74	Project Termini County G to WIS 69	Estimated Total Project Cost (design, construction, real estate, etc). Include delivery cost in Year of Expenditure (YOE). \$11,000,000 in 2023 dollars
County Dane	Township and/or Nearest Municipality City of Verona	
National Highway System (NHS) Route <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Section / Township / Range Section 20 and 21 / T6N / R8E	Real Estate Acquisition Portion of Estimated Cost (YOE) \$500 in 2023 dollars
		Utility Relocation Portion of Estimated Cost (YOE) 0 in 2023 dollars

Project Title US 18 Mont Horeb – Madison CTH G to STH 69		Number of Relocations: Residential 0 Business 0 Other 0	
Section 4(f): <input type="checkbox"/> No Section 4(f) <input checked="" type="checkbox"/> Exception to Section 4(f) <input type="checkbox"/> De Minimis Section 4(f) <input type="checkbox"/> Programmatic Section 4(f) <input type="checkbox"/> Individual Section 4(f) Evaluation	Bridge Number(s) (<i>if applicable</i>) B-13-403 B-13-52 B-13-383 B-13-573 C-13-111	Right of Way Acquisition	Acres
		Fee	0
		Permanent Limited Easement (PLE)	0
		Temporary Limited Easement (TLE)	1.17
		Highway Easement (HE)	0


Functional Classification of Existing Route (FDM 4-1-10 & 4-1-15)	Urban		Rural		WisDOT Project Improvement Strategy and Type (FDM 3-5 & FDM 11-1 attachment 10.1)	
					Improvement Strategy – Improvement Type	
Freeway/Expressway	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Perpetuation – Preservation/Restoration	<input type="checkbox"/>
Principal Arterial	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Perpetuation – Resurfacing	<input type="checkbox"/>
Minor Arterial	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Perpetuation – Pavement Replacement	<input type="checkbox"/>
Major Collector	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Perpetuation – Bridge Rehabilitation	<input type="checkbox"/>
Minor Collector	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Perpetuation – Bridge Preventative	<input type="checkbox"/>
Local	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Rehabilitation – Preservation/Restoration	<input type="checkbox"/>
No Functional Class	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Rehabilitation – Resurfacing	<input type="checkbox"/>
Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Rehabilitation – Pavement Replacement	<input type="checkbox"/>
Is any part of a 23 CFR 667, Facilities Repeatedly Requiring Repair and Reconstruction (F4R) site within the Project Termini: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (reference information link is below) (https://wisconsindot.gov/Pages/doing-bus/local-gov/astnce-pgms/highway/f4r.aspx) If "Yes" is checked, the project's alternative analysis must comply with FDM 3-22					Rehabilitation – Reconstruction	<input type="checkbox"/>
Environmental Process Start Date: July 6, 2023					Rehabilitation – Bridge Rehabilitation	<input type="checkbox"/>
Name of Individual/ Firm Preparing this Form: Kayla Janowski, AICP / AECOM Technical Services, Inc.					Rehabilitation - Bridge Replacement	<input type="checkbox"/>
					Modernization - Expansion	<input type="checkbox"/>
					Preventative Maintenance	<input type="checkbox"/>
					State Majors	<input type="checkbox"/>
					Other – Describe: Widening for auxiliary lanes and interchange ramps only	<input checked="" type="checkbox"/>

23 CFR 771.117(c) or (d) or Trans 400 WI Admin Code Project Type Number and Text: (c) (26) Modernization of a highway by resurfacing, restoration, rehabilitation, reconstruction, adding shoulders, or adding auxiliary lanes (including parking, weaving, turning and climbing lanes), if the action meets the constraints in paragraph (e) of this section.

WisDOT Region Environmental Coordinator (REC) or Central Office BTS-EPDS Staff:
I certify that I meet the requirements for staff who review and recommend approval of Categorical Exclusion (CE) actions, specified in the FHWA – WisDOT CE Programmatic Agreement (CE-PA). I further certify that I have reviewed this document and agree with the determination that the proposed project and resultant impacts meet the definition of a CE as described in 23 CFR 771.117(a) & (b) and will not result in significant environmental impacts. I recommend this CE for approval.

Brian Taylor
Brian Taylor

Digitally signed by Brian Taylor
Date: 2024.01.04 13:26:06 -06'00'

Print – Name and Affiliation	Signature	(Date – m/d/yy)
<p>WisDOT Region or Central Office Project Manager or BTS-EPDS Staff Member: I certify that I am familiar with this proposed project and its impacts and that the information contained in this document is accurate and can be relied upon for documentation decisions. I further certify that the mitigation measures and commitments proposed herein will be incorporated into the project plans and contract documents. If this CE is a type delegated to WisDOT for approval under the CE-PA, I approve this CE. If this CE is a type retained for approval by FHWA, I recommend this CE for approval.</p>		
Kevin Drunasky		Digitally signed by Kevin Drunasky DN: C=US, E=kevin.drunasky@dot.wi.gov, O=WisDOT, CN=Kevin Drunasky Reason: I am approving this document Date: 2024.01.04 14:17:45-06'00'
Print – Name and Affiliation	Signature	(Date – m/d/yy)

FHWA Approval

This CEC has been prepared for a CE listed in 23 CFR 771.117(d) that has not been delegated to WisDOT for approval by FHWA through the CE-PA, Section VI. B. 1. WisDOT has consulted with FHWA per CE-PA Section VII. A. 3 and determined a CEC is acceptable documentation for the proposed action. FHWA must review and approve this CEC prior to WisDOT proceeding with final design, acquisition of right of way or construction. FHWA approves this CE.

(Signature)

(Date)

This template may be used for National Environmental Policy Act (NEPA) documentation and/or Wisconsin Environmental Policy Act (WEPA) CE documentation.

A determination that this project satisfies the criteria for an FHWA Categorical Exclusion (CE) does not relieve the applicant of the requirement to comply with other laws and regulations including, but not limited to, Section 404 of the Clean Water Act, Section 7 of the Endangered Species Act, Section 106 of the National Historic Preservation Act, and Section 4(f) of the US Department of Transportation Act. Coordination to comply with these other laws may require FHWA involvement. Furthermore, designation of this project as a (c)-listed CE does not relieve the requirement for WisDOT to coordinate with WDNR under the Cooperative Agreement. Any correspondence or documentation used to comply with Federal, State, or Local laws or regulations should be maintained in the project file and provided with this checklist upon request.

I. Fiscal Constraint

Projects identified in the WisDOT Statewide Transportation Improvement Program (STIP) per 23 CFR 450.218(g), which are typically FHWA or Federal Transit Administration (FTA) funded projects, must demonstrate fiscal constraint. In addition, and regardless of funding source, projects defined as regionally significant per 23 CFR 450.104 and 23 CFR 450.218(h), must also demonstrate fiscal constraint.

Indicate whether a project ID for a subsequent phase following design (either a project ID for meaningful right-of-way acquisition or a project ID for construction) is included in the most recent version, or a previous version of the STIP, included in a STIP amendment, or listed in the STIP with a Backlog Advanceable Pilot Program (BAPP) STIP label. One of the boxes must be checked to demonstrate fiscal constraint.

If the proposed project is within a metropolitan planning area, it also must be in the metropolitan planning organization (MPO) Transportation Improvement Program (TIP).

<input type="checkbox"/>	The proposed action is not federally funded with FHWA or FTA funds per 23 CFR 450.218(g), does not require federal approval, and is not considered a regionally significant project. Federal fiscal constraint requirements do not apply.
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Factor	Commitment (If none, indicate N/A)
Business and Economics	An initial construction notification, including a project description and traffic impacts, will be sent to the Region Communication Manager two weeks before the start of the project. The Region Communication Manager will send a press release to local media outlets to notify the public. The WisDOT construction project manager will ensure commitments are met.
Community	An initial construction notification, including a project description and traffic impacts, will be sent to the Region Communication Manager two weeks before the start of the project. The Region Communication Manager will send a press release to local media outlets to notify the public. The WisDOT construction project manager will ensure commitments are met.
Aesthetics	No special or supplemental commitments required.
Agriculture	If the project is modified to impact additional agricultural lands, the DATCP will be re-notified. The WisDOT construction project manager will ensure commitments are met.
Relocations	No special or supplemental commitments required.
Indirect Impacts	No special or supplemental commitments required.
Cumulative Impacts	No special or supplemental commitments required.
Environmental Justice	No special or supplemental commitments required.
Historic Properties	No special or supplemental commitments required.
Burial Sites	No special or supplemental commitments required.
Tribal Lands	No special or supplemental commitments required.
Section 4(f)	Restoration and landscaping of disturbed areas will be completed. The WisDOT construction project manager will ensure commitments are met.
Section 6(f) or Other Specially Funded Lands	Restoration and landscaping of disturbed areas will be completed. The WisDOT construction project manager will ensure commitments are met.
Wetlands	Unavoidable permanent wetland loss (about 0.5 acres) will be mitigated. A PCN will be submitted prior to construction. Project equipment working in the wetland shall be decontaminated for removal of invasive species prior to and after each use by utilizing best management practices to avoid the spread of invasive species as outlined in NR 40, Wis. Adm. Code. The WisDOT Region Environmental Coordinator will ensure fulfillment of the banking commitment. The WisDOT construction project manager will ensure commitments are met.
Surface Water Resources	There shall be no in-stream disturbance between September 15 and May 15, with both dates inclusive of the timeout period. Measures to reduce total suspended solids (TSS) and total phosphorus (TP) by following best management practices to treat stormwater runoff during and post construction to the maximum extent practicable will be implemented and followed. These commitments will be included in the special provisions and the WisDOT Design Engineer and Construction Supervisor will ensure fulfillment of these commitments.
Floodplains	Mapped floodplain exists within the project limits. Proposed temporary widenings or work areas within the mapped floodplain areas will be coordinated with the Dane County Zoning Department. The WisDOT Design Project Manager will ensure fulfillment of this commitment.
Groundwater, Wells and Springs	N/A
Coastal Zones	N/A
Unique Wildlife and Habitat Concerns	N/A

Threatened, Endangered and Protected Resources	<p>Vegetation/trees/brush will be removed by April 1, prior to any flowering forb growth. Stripped topsoil will be salvaged and reused. WisDOT will also utilize a special salt tolerant seed (#30 mix) in graded areas in contact with salt contaminated snow (fore slope and ditch bottom). In graded areas on the back slope and other areas where applicable, WisDOT will use a flowering forb mix (WisDOT 70A mix) as well as plant flowering shrubs in areas outside of the clear zone and where applicable.</p> <p>Amphibian and reptile exclusion fencing protocols will be followed to avoid impacts to the Special Concern Species. The fencing will be installed in areas to be disturbed that have wetlands present prior to May 1. Any turtles found within the project area will be moved outside of the project limits.</p> <p>Biodegradable non-netted erosion control matting (e.g. Class I Type A Urban, Class I Type B Urban, or Class II Type C) to be used along stream banks, to avoid animal entrapment.</p> <p>Tree clearing will occur during the inactive season (November 1st – March 31st).</p> <p>Bridge and culvert (4-ft or larger) bat assessments will be completed every two years (originally completed on August 7, 2023) prior to and during construction.</p> <p>If bats are detected on the bridge any time prior to or during construction, the Post Assessment Discovery of Bats at Bridge/Culvert or Structure Form will be submitted to USFWS within two working days of the incident.</p> <p>Any sick, injured, or dead bats (regardless of species) or any other federally listed species located at the project site will be promptly reported to USFWS. Care when handling any of these species will be taken to preserve biological material in the best possible condition and to protect the handler from exposure to diseases, such as rabies. Project personnel are responsible for ensuring that any evidence about determining the cause of death or injury is not unnecessarily disturbed.</p> <p>All personnel working on the project will be made aware of these commitments.</p> <p>To avoid impacts to migratory birds the project will occur between September 1st and April 14th or unoccupied bird nests will be removed during the non-nesting season and barrier netting will be installed prior to April 15th.</p> <p>Stripped topsoil from north side of C-13-111 will be salvaged before culvert extension work begins and reused after culvert extension work is completed, ensuring the existing seed bank will re-establish.</p> <p>These commitments will be included in the special provisions (and plans as applicable) and the WisDOT Design Engineer and Construction Supervisor will ensure fulfillment of these commitments.</p>
Air Quality	No special or supplemental commitments required.
Construction Sound	WisDOT Standard Specifications 107.8(6) and 108.7.1 will be used and followed. WisDOT Design and Construction Project Managers to ensure these commitments are met.
Traffic Noise	No special or supplemental commitments required.
Hazardous Substances, Contamination and Asbestos	N/A
Stormwater	<p>For projects disturbing an acre or more of land, erosion control and storm water measures must adhere to the Wisconsin Pollutant Discharge Elimination System Transportation Construction General Permit (TCGP) for Storm Water Discharges. Coverage under TCGP is required prior to construction. DOT should apply for permit coverage just before the project goes to final PS&E. Permit coverage will be issued by the DNR after design is complete and documentation shows that the project will meet construction and post-construction performance standards. For more information regarding the TCGP you can go to the following link, and click on the “Transportation” tab: https://dnr.wi.gov/topic/Sectors/Transportation.html. WisDOT Design Project Manager to ensure these commitments are met.</p>
Erosion Control	In accordance with TRANS 401, the Contractor is required to prepare an erosion control implementation plan (ECIP) and submit the plan to WisDOT and WDNR for review, at least 14 days prior to the preconstruction conference. WisDOT Construction Project Manager to ensure commitments are met.
Other:	

Other:	
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