ENVIRONMENTAL EVALUATION OF FACILITIES DEVELOPMENT ACTIONS

Wisconsin Department of Transportation (WisDOT)
DT2094 1/2016

BASIC SHEET 1 – PROJECT SUMMARY

Project ID 8915-01-01 Construction ID 8915-00-70	Project Termini WIS 178 – County K	Funding Sources *(check all that apply)* ☐ Federal ☒ State ☒ Local Estimated Project Cost and Funding Source (state and/or federal). Year of Expenditure (YOE) dollars include delivery cost. $4,700,000 in 2019 dollars $5,000,000 in 2022 dollars
Route Designation *(if applicable)* County TT National Highway System (NHS) Route ☐ Yes ☒ No	Nearest Community Towns of Eagle Point and Arthur	Real Estate Acquisition Portion of Estimated Cost (YOE) $6,000 in 2019 dollars $6,350 in 2022 dollars
Project Title Chippewa River Bridge B090965	Section / Township / Range S2/T30N/R7W S3/T30N/R7W	Utility Relocation Portion of Estimated Cost (YOE) $0 in 2019 dollars $0 in 2025 dollars
County Chippewa County		
Bridge Number(s) *(if applicable)* B-09-0965	For an ER, indicate the date funding was authorized to begin preliminary engineering. For an EA, indicate the date the Process Initiation Letter was accepted by FHWA. 3/19/2014	

Right of Way Acquisition	Acres
Fee	0.117
TLE	0.005
PLE	

Functional Classification of Existing Route (FDM 3-5-2)	Urban	Rural
Freeway/Expressway	☐	☐
Principal Arterial	☐	☐
Minor Arterial	☐	☐
Major Collector (WIS 178)		☒
Minor Collector		☐
Collector	☐	
Local (County TT, County K, 180th Ave)	☐	☒
No Functional Class	☐	☐

WisDOT Project Classification (FDM 3-5-2)	
Resurfacing	☐
Pavement Replacement	☒
Reconditioning	☐
Expansion	☐
Bridge Rehabilitation	☐
Bridge Replacement	☒
"Majors" Project (there are both state and federal majors)	☐
SHRM	☐
Reconstruction	☒
Preventive Maintenance	☐
Safety	☐
Other – Describe:	☐

☐ FHWA Draft Type 2c Categorical Exclusion (CE)/WisDOT Draft Environmental Report (ER). **No significant impacts indicated by initial assessment.**
☐ FHWA/WisDOT Draft Environmental Assessment (EA). **No significant impacts indicated by initial assessment.**

(Print – Preparer Name, Title, Company/Organization) (Date – m/d/yy)

(Signature – Director, Bureau of Technical Services) (Date – m/d/yy)

(Signature, Title) (Date – m/d/yy)
☐ Region ☐ Aeronautics ☐ Rails & Harbors

(Signature, Title) (Date – m/d/yy)
☐ FHWA ☐ FAA ☐ FTA ☐ FRA

☒ FHWA Final Type 2 Categorical Exclusion (CE)/WisDOT Final Environmental Report (ER). It has been determined **no significant impacts will occur** and a Public Hearing is not required.

After reviewing and addressing substantive public comments, updating the Draft CE/ER or Draft EA and coordinating with other agencies, it is determined this action:

☐ **Will NOT significantly affect** the quality of the human environment. This document is a Final CE/Final ER.
☐ **Will NOT significantly affect** the quality of the human environment. This document is a Final EA/Finding of No Significant Impact.
☐ **Has potential to significantly affect** the quality of the human environment. Draft Environmental Impact Statement (EIS) required.

Nathan Guequierre, Senior Planner, AECOM (08/24/20)
(Print – Preparer Name, Title, Company/Organization) (Date – m/d/yy)

Matthew Thornsen, PE
NW Region Local Program Project Manager

Scott J. Lawry 8-31-2020
(Signature – Director, Bureau of Technical Services) (Date – m/d/yy)

(Signature, Title) (Date – m/d/yy)
☒ Region ☐ Aeronautics ☐ Rails & Harbors

(Signature, Title) (Date – m/d/yy)
☐ FHWA ☐ FAA ☐ FTA ☐ FRA

BASIC SHEET 2 – TABLE OF CONTENTS, ABBREVIATIONS/ACRONYMS, DOCUMENT DESCRIPTION

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2. Abbreviations and Acronyms

ADT	Average Daily Traffic
AIS	American Indian Studies
County	County Trunk Highway
DATCP	Department of Agriculture, Trade and Consumer Protection
DfC	Document for Consultation
DNR	Department of Natural Resources
EO	Executive Order
ER	Environmental Report
FDM	Facilities Development Manual
FHWA	Federal Highway Administration
MOA	Memorandum of Agreement
NBI	National Bridge Inventory
NBIS	National Bridge Inspection Standards
NEPA	National Environmental Policy Act
NRCS	Natural Resources Conservation Service
SHPO	State Historic Preservation Office
STSP	Standardized Special Provisions
USACE	United State Army Corps of Engineers
USCG	United State Coast Guard
USFWS	United State Fish and Wildlife Service
WEPA	Wisconsin Environmental Policy Act
WIS	Wisconsin State Trunk Highway
WisDOT	Wisconsin Department of Transportation

3. Environmental Document Statement

This environmental document is an essential component of the National Environmental Policy Act (NEPA) and Wisconsin Environmental Policy Act (WEPA) project development process, which supports and complements public involvement and interagency coordination.

The environmental document is a full-disclosure document which provides a description of the purpose and need for the proposed project, the existing environment, analysis of the anticipated beneficial or adverse environmental effects resulting from the proposed action and potential mitigation measures to address identified effects. This document also allows others the opportunity to provide input and comment on the proposed action, alternatives and environmental impacts. Finally, the environmental report provides the decision maker with appropriate information to make a reasoned choice when identifying a preferred alternative.

1. Purpose and Need

A. History

The Cobban Bridge is a two-span Pennsylvania overhead truss type structure and is the oldest structure of its kind in Wisconsin. The bridge (formerly the Yellow River Bridge), was originally constructed in 1908, just north of Chippewa Falls. Between 1916 and 1918, the Wissota Dam was constructed four miles downstream of the bridge, putting its original site under water. During the winters of 1916 and 1917, the bridge was dismantled and hauled 15 miles upstream to its current location, see figure 1 below for bridge location overview. New foundations were built, and the bridge was erected in its new location in 1918 and 1919.

The current bridge was closed in August 2017 after an inspection revealed the bridge was no longer structurally sound. While open, the bridge carried County TT across the Chippewa River in central Chippewa County, midway between Jim Falls and Cornell (see Exhibit 1 – Project Location Map). The existing bridge has an overall length of 486 feet and a clear roadway width of 15 feet. The Cobban Bridge is a single-lane bridge with a wooden deck that, prior to its closure, carried local traffic over the Chippewa River. See figure 2 below for an image of the Cobban Bridge. The structure was rehabilitated in 1995, consisting of new substructure units, two new stringers (beams under the deck), and a new deck. Since then, miscellaneous maintenance and repair work was undertaken in the years prior to the bridge's closing.

Figure 1: Cobban Bridge Location Overview

B. Purpose

The purpose of this proposed action is to address a long-term safe and efficient link in the Chippewa County Highway transportation system for crossing of the Chippewa River between WIS 178 and County K, while being sensitive to the natural and cultural resources of the area. The purpose is also to meet the traveling public's needs while providing the most economical life-cycle cost (process of estimating money spent on an asset over the course of its useful life).

C. Need

The need for the proposed action is summarized as follows (for a complete discussion of the need, please see Exhibit 2 – Location Study Report):

- Identified Structural Deficiencies and presence of fracture critical members
- Identified Functional Deficiencies
- System Linkage Deficiencies

Figure 2: Cobban Bridge - 2014

a. Structural Deficiencies

Although this project does not include Federal funds, FHWA's evaluation standards were used as relevant for consistency. FHWA has an established sufficiency rating formula to provide a method of evaluating highway bridge data by calculating four separate factors to obtain a numeric value which is indicative of a bridge sufficiency to remain in service. The result of this method is a percentage in which 100 percent would represent an entirely sufficient bridge and zero percent would represent an entirely insufficient or deficient bridge. The formula considers the structural adequacy, functional obsolescence and level of service.

Ratings below 50 percent warrant replacement. Cobban Bridge has a current rating of 31.1 percent. If not replaced, the bridge will continue to deteriorate and will eventually fail. The bridge was closed to all traffic in August 2017 due to safety concerns. The Cobban Bridge remains closed at this time. The Cobban Bridge will be removed as part of the project regardless of other actions due to these safety concerns.

The primary considerations in classifying structural deficiencies are the bridge component condition ratings. The National Bridge Inventory (NBI) database contains ratings on three primary components of a bridge: the deck (the primary surface used for transportation), superstructure (supports the deck and transfers the load of the deck and traffic to the supports), and substructure (the foundation of the bridge and transfers loads of the structure to the ground). Condition ratings are assigned for these primary components during safety inspections by the bridge inspector to describe the existing, in-place status of a component. Bridge inspectors assign condition ratings by evaluating the severity of the deterioration or disrepair and the extent it has spread through the component being rated. They provide an overall characterization of the general condition of the entire component being rated and not an indication of localized conditions.

Components are rated on a scale of 0 to 9, with 0 meaning "failed condition, beyond corrective action" and 9 meaning "superior to present desirable criteria." Ratings of 3 or 4 are categorized as "poor" condition generally, and ratings of 1 or 2 are considered "severe." If one element of a bridge receives a condition rating of four or less, the bridge is considered structurally deficient. Prior to its closure, the superstructure of the Cobban Bridge was rated 4, or "Serious." Prior to closure, the bridge was posted for a maximum load of six tons and also a five mile per hour

speed limit. Both of these restrictions were due to the structural deficiencies currently present at that time. In addition, the bridge has fracture critical members, meaning that the failure of one component will cause the collapse of the entire bridge. Although the presence of fracture critical members in a bridge is not a structural deficiency, it does warrant concern due to age and deterioration. Additionally, including fracture critical members in a bridge is no longer a current design practice.

b. Functional Deficiencies

Any bridge classified as structurally deficient is excluded from the functionally obsolete category. The existing Cobban Bridge would otherwise meet the NBI's criteria to be functionally obsolete because of the deck geometry.

Appraisal ratings are the primary criteria used in the classification of functional deficiencies because they are the best way to evaluate a bridge in relation to the level of service the bridge provides on the highway system on which the bridge is located. The appraisal ratings compare the existing conditions with the current standards used for highway bridge design.

The deck geometry of the existing Cobban Bridge has an Appraisal Rating of 2, due to the narrow, one-lane, width. The Appraisal Rating of 2 results in a functional deficiency that would classify the bridge as functionally obsolete if the bridge wasn't already classified as structurally deficient. Cobban Bridge is currently posted as functionally deficient due to its single lane, narrow clear width, and substandard 12-foot vertical clearance that prevents trucks and large farm equipment from utilizing the structure.

The Cobban Bridge is functionally below current standards in other ways as well. Table 1 compares Cobban Bridge's current functional deficiencies to the Wisconsin Department of Transportation's (WisDOT) current design standards found in the FDM 11-15 Attachment 1.17 Modernization Design Criteria for County Trunk Highways Functionally Classified as Local Roads.

Table 1
Functional Deficiencies

Item	Existing	Current Design Standards
Posted Speed Limit	5 MPH	55 MPH
Clear Width	15'	30'
Design Loading	6 Tons (posted)	Minimum 36 Tons*
Vertical Clearance	12'-0"	14'-9"-15'-3"

* HL-93 (AASHTO vehicle load standard for highways)

c. System Linkage/Social Demands

Prior to its closure, The Cobban Bridge was an important link connecting WIS 178 and County K across the Chippewa River. The next river crossings are WIS 64, six miles north in Cornell or County Y, six miles south in Jim Falls. Because the bridge is closed and the bridge is an important link, emergency services, law enforcement, school buses, farmers, local residents, and tourists are limited to crossing the Chippewa River elsewhere. Below are examples of the public's restricted usage of this bridge.

1. Fire trucks are forced to cross the Chippewa River 7 miles to the north (10 minute travel time) at Cornell or 6 miles to the south (8 minute travel time) at Jim Falls.

2. for ambulances and law enforcement, the fastest route from the nearest ambulance service (in Cornell) to the nearest hospital (in Chippewa Falls) is WIS 178 on the west side of the river. The Cobban Bridge was a critical crossing location for those in need of medical services on the east side of the river.

3. School buses are not able to cross at this location, leading to increased costs and mileage, including an additional bus route.

4. Farmers are limited in their ability to move farm equipment from one side of the river to the other with bridge closure, leading to increased costs and mileage.

5. Road construction and highway maintenance equipment are unable to cross at this location, resulting in longer haul routes.

2. Summary of Alternatives

For a complete description of Alternatives, please see Exhibit 2 – Location Study Report.

The scoping stage of this project was completed in two screenings. At the end of each screening, alternatives were presented to the public for comment. Table 2 schematically summarizes the project's alternative development process.

Table 2. Alternative Development Process Schematic

Preliminary Alternatives	Screening #1	Detailed Study Alternatives Development	Screening #2	Preferred Alternative
No Build	→	No Build		
Rehabilitation Alternative 1	✗			
Rehabilitation Alternative 2	✗			
Rehabilitation Alternative 3	✗			
Build Alternative 1	→	Alternative 1		
		Alternative 1B		
Build Alternative 2	✗			
Build Alternative 3	→	Alternative 3	→	Alternative 3: Existing Location
Build Alternative 4	✗			
Build Alternative 5	→	Alternative 5		

1 Preliminary Alternatives shown to the public on September 8 & 9, 2014 (PIM #1 and 2)
2 Detailed Study Alternatives and Preferred Alternative presented on January 5 & 6, 2016 (PIM #3 and 4)

A. Description of Preliminary Alternatives

In an effort to explore all the alternatives to best meet the traveling public's needs while remaining sensitive to the area's natural and cultural resources, several preliminary alternatives were considered. They can be broken down into three main categories:

- No Build
- Bridge Rehabilitation
- New Bridge

No Build

If Cobban Bridge were to remain in place with no improvements the bridge would become a high-risk liability to Chippewa County, due to the bridge's deterioration and risk for failure. Therefore, included in the no build alternative is the removal of Cobban Bridge and existing causeway. With this alternative, the bridge would not be replaced and surrounding roadways of WIS 178, County K and County TT would remain the same.

Bridge Rehabilitation Alternatives

As part of this study, three rehabilitation strategies were considered. Each rehabilitation alternative attempted to maintain the historical integrity of Cobban Bridge while also meeting the purpose and need of this project. The typical sections of the bridge rehabilitation alternatives can be seen in Exhibit 3 – Typical Sections.

Rehabilitation Alternative 1: Rehabilitate Existing Bridge as a Pedestrian Structure

The first rehabilitation alternative considered was repurposing Cobban Bridge to be used as a pedestrian structure and then construct a new vehicular bridge parallel to the existing structure between WIS 178 and County K.

Rehabilitation Alternative 2: Widen structure to Two Lanes Maintaining Historical Integrity

Currently, Cobban Bridge is a single lane bridge and is 15 feet wide. To meet current geometric design standards, County TT would need to be designed for a bridge width of 30 feet. Rehabilitation Alternative 2 considered widening the existing bridge to meet current design standards at a width of 30 feet from the existing 15 feet. With this alternative, the existing bridge's substandard vertical clearance would not be addressed.

Rehabilitation Alternative 3: One Lane Pairs

A third alternative would be to rehabilitate the Cobban Bridge to carry one-way traffic while maintaining its current geometry. A second single lane bridge would then be built adjacent to the Cobban Bridge to facilitate traffic in the opposite direction. Independent two-way traffic is necessary in order to meet the purpose and need of this project. Similar to Alternative 2, the vertical clearance of the structure would not be changed as a result of the rehabilitation. The roadway would continue to be posted for a maximum vehicle height of 12 feet.

Build Alternatives

As part of this study, five preliminary build alternative corridors were considered. The typical sections of the build alternatives can be seen in Exhibit 3 – Typical Sections. A map displaying the five alternatives can be seen in Exhibit 4 – Preliminary Alternatives Overview Map.

Build Alternative 1: 180th Avenue/County TT

Alternative 1 would involve replacing the Cobban Bridge about 1,300 feet south of the existing bridge and would join 180th Avenue on the west side of the river to County TT on the east side of the river. A close up of this alternative can be seen in Exhibit 5 – Preliminary Alternative 1 Map.

Build Alternative 2: Just South of Existing

Alternative 2 would involve replacing the Cobban Bridge about 40 feet south of the existing bridge and would provide a crossing between WIS 178 on the west side of the river and County K on the east side of the river. WIS 178 would be shifted 200 feet to the west at the bridge intersection and County K would be realigned to be straight. The Old Abe State Trail would be realigned to cross County K farther south. A close up of this alternative can be seen in Exhibit 6 – Preliminary Alternative 2 Map.

Build Alternative 3: At Existing Location (Preferred Alternative)

Alternative 3 would involve replacing the Cobban Bridge at the current location and would provide a crossing between WIS 178 on the west side of the river and County K on the east side of the river. This alternative utilizes the existing causeway. The limits of reconstruction on the east side of the river would extend to the County K intersection, stopping before the Old Abe State Trail. A close up of this alternative can be seen in Exhibit 7 – Preliminary Alternative 3 Map.

Alternative 4: Just North of Existing

Alternative 4 would involve replacing the Cobban Bridge about 70 feet north of the existing bridge and would provide a crossing between WIS 178 on the west side of the river and County K on the east side of the river. WIS 178 would be shifted 200 feet to the west at the bridge intersection and County K would be realigned to be straight. The Old Abe State Trail would be realigned to cross County K farther south. A close up of this alternative can be seen in Exhibit 8 – Preliminary Alternative 4 Map.

Alternative 5: County R/200th Avenue

Alternative 5 would involve replacing the Cobban Bridge about two miles north of the existing bridge and would join County R on the west side of the river and 200th Avenue on the east side of the river. 234th Street would be joined to 200th Avenue. A close up of this alternative can be seen in Exhibit 9 – Preliminary Alternative 5 Map.

B. Comparison of Preliminary Alternatives

Impacts were calculated along the corridor for each of the proposed alternatives. Impacts include: project length, construction cost, farms potentially affected, wetlands impacted, area from farm operations, total land impacted, relocations, potentially eligible historic properties, archaeological sites, and if the Old Abe State Trail is affected. Construction costs do not include removal of the existing bridge or existing causeway, which will be required for the No Build Alternative and some of the New Build Alternatives. However, removal costs will be consistent among all of those alternatives. The estimates for bridge removal range from $1,000,000 to $3,000,000. The existing causeway removal would be approximately $200,000. The impacts of each preliminary alternative are summarized below in Tables 3 and 4.

No Build

The no build alternative would be the least expensive. However, this alternative would not address the project's purpose and need. The no build alternative was carried forward to the detailed study alternatives phase of the project for a baseline comparison.

Table 3
Comparison of Impacts – No Build/Preliminary Rehab Alternatives

Comparison Factor	No Build	Rehab 1: Pedestrian Bridge*	Rehab 2: Widen Bridge	Rehab 3: One Way Pairs
Project Length (Lane Miles)	0	N/A	0.6	0.8
Construction Cost: ($Mil)	$0	N/A	>$15	>$13
Farms Affected	0	N/A	2	2
Wetland (Acres)	0	N/A	0	1.0
Area From Farm Operations Required (Acres)	0	N/A	2.4	3.8
Other Area Converted to Right of Way (Acres)	0	N/A	3.6	6.2
Total Land Impacted (Acres)	0	N/A	6	10
Relocations	0	N/A	1	2
Potentially Eligible Historic Properties (not including Cobban Bridge)	0	N/A	0	2
Archaeological Sites	0	N/A	3	2
Old Abe State Trail Affected	No	N/A	No	Yes

*This alternative was determined to not be feasible, therefore impacts were not calculated. See Exhibit 10, Structure Rehab Report for details.

Table 4
Comparison of Impacts – Preliminary New Build Alternatives

Comparison Factor	1 (180th)	2 (South)	3 (Existing)	4 (North)	5 (200th)
Project Length (Lane Miles)	1.2	0.8	0.6	0.8	1.1
Construction Cost: ($Mil)	$7.0	$5.1	$3.5	$5.9	$7.4
Farms Potentially Affected	3	2	2	2	4
Additional Wetland (Acres)	0.8	1.0	0	0.8	1.0
Area From Farm Operations Required (Acres)	3.8	3.8	2.4	3.5	9.4
Other Area Impacted (Acres)	8.2	5.2	3.6	6.5	3.6
Total Land Impacted (Acres)	12	9	6	10	13
Relocations	5	1	1	2	1
Potentially Eligible Historic Properties (not including Cobban Bridge)	1	1	1	2	0
Archaeological Sites	1	2	3	2	2
Old Abe State Trail Affected	Yes	Yes	No	Yes	No

Bridge Rehabilitation

The Rehab Alternatives are considerably more expensive than any of the New Build Alternatives due to the age, deterioration and design of the Cobban Bridge. The Cobban Bridge is in a state of deterioration that results in the need for large portions of the bridge to be replaced. Some of these components are no longer made, leading to increased cost to fabricate replacement components. In addition, the rehabilitation methods are complicated, requiring considerable disassembly. The historical integrity of the existing structure would be difficult if not impossible to maintain. For these reasons, all three rehabilitation alternatives were dismissed. See Exhibit 10 – Structure Rehab Letter Report for a detailed analysis of rehabilitation strategies considered.

New Build Alternatives

In summary, the New Build Alternatives were analyzed and the decision to move forward with Alternatives 1, 3, and 5 was made based on the comparison of impacts, system linkage, and feedback from the community. Alternatives 1 and 5 are best for system linkage. Alternative 3 is the most cost effective and causes the fewest impacts to the natural and social environments. Alternatives 2 and 4 were dismissed because their performance was similar to Alternative 3, but their environmental impacts were greater.

C. Description of Detailed Study Alternatives

The detailed study alternatives are described below. For all of the alternatives, the existing Cobban Bridge would be demolished and the associated costs to remove the bridge are included in the construction cost estimates. For alternatives 1, 1b, and 5, the existing causeway would also be removed and the associated costs for that are included in the construction cost estimates. Also, all of the alternatives have an assumed structure depth of 7’-0” with a freeboard vertical distance of 2’-0” above the 100-year flood elevation. The following detailed

study alternatives are illustrated in Exhibit 11 – Detailed Study Alternatives Overview Map.

- Alternative 1: 180th Avenue/County TT (spans over Old Abe State Trail)
- Alternative 1b: 180th Avenue/County TT (at grade crossing with Old Abe State Trail)
- Alternative 3: At Existing Location (**Preferred Alternative**)
- Alternative 5: County R/200th Avenue

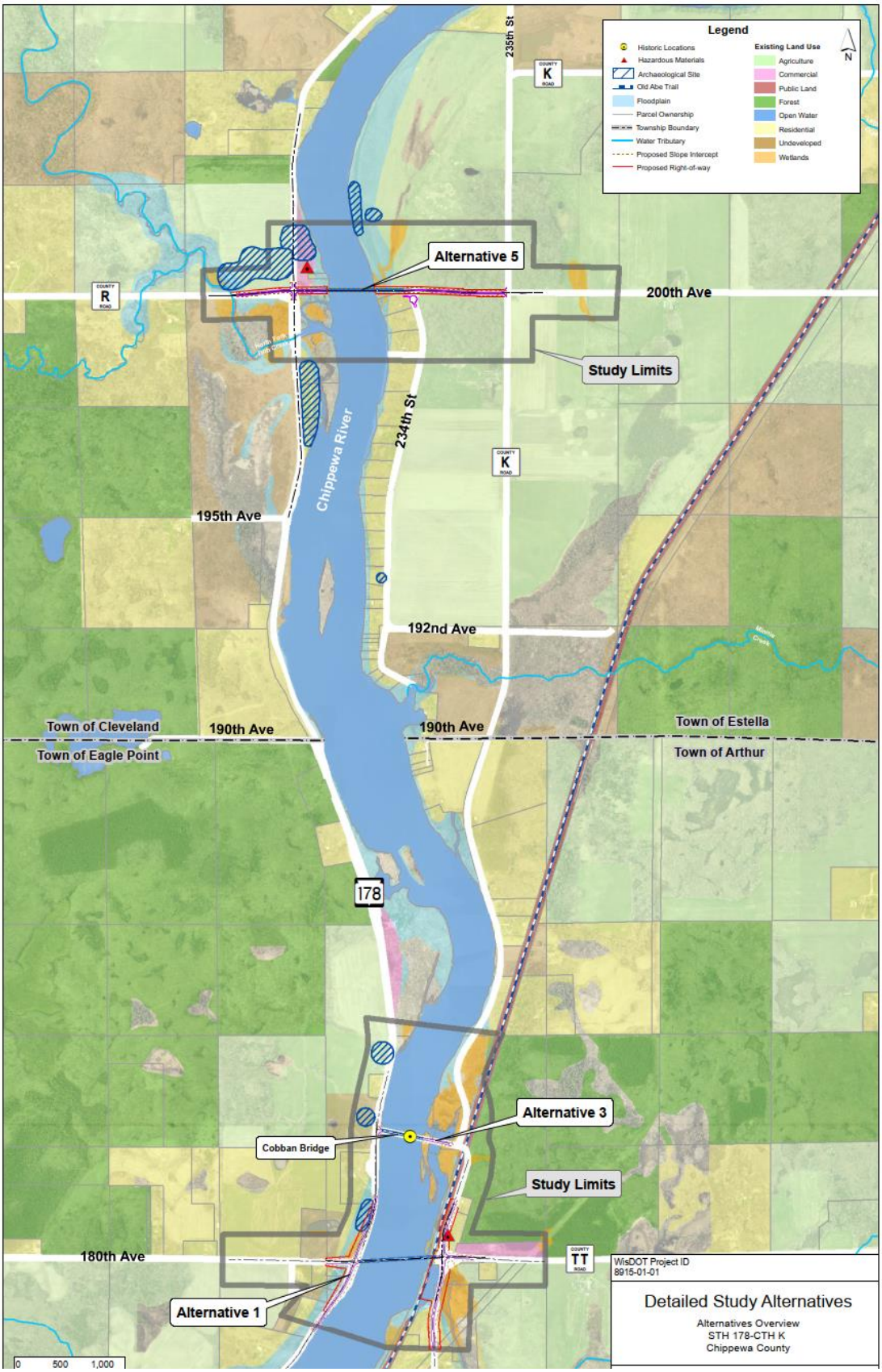

Figure 3: Alternative Location Map

Alternative 1: 180th Avenue/County TT

During the detailed study phase of this project, Alternative 1 was refined from the preliminary version in order to reduce the overall environmental impacts. Alternative 1 would still involve replacing Cobban Bridge about 1,300 feet south of the existing bridge and would join 180th Avenue on the west side of the river to County TT on the east side of the river. However, the bridge would span over the Old Abe State Trail with a clearance of twelve feet, which necessitates raising of County K to intersect with County TT.

Beam guard will be incorporated into the roadway design along both sides of the causeway for County K and along the east side of WIS 178. Beam guard would be used to minimize impacts to the Chippewa River along the proposed causeway and the east side of WIS 178. The inclusion of beam guard reduces impacts because it allows the use of steeper slopes which minimizes the overall footprint of the project. WIS 178 would be realigned to the west to better accommodate the proposed County TT/180th intersection and to avoid impacts to the river. The bridge would also be raised 12 feet to accommodate the 7'-0" structure depth and 2'-0" freeboard above the 100-year flood elevation.

The limits of reconstruction were changed to extend north of the 180th Avenue/ WIS 178 intersection 600 feet, south of the intersection 700 feet, and west 400 feet from the river's edge. The limits of reconstruction on the east side of the river would extend north of the County TT/County K intersection 700 feet, south of the intersection 1,100 feet, and east 500 feet from the river's edge. The estimated cost to construct Alternative 1 was increased from $7 million to $11.2 million. Alternative 1 can be seen in Exhibit 12 – Detailed Alternative 1 Map.

Alternative 1B: 180th Avenue/County TT

Alternative 1B was added during the detailed study to consider another option for crossing the river at this location, with the goal of minimizing impacts. Similar to Alternative 1, Alternative 1b involves replacing Cobban Bridge about 1,300 feet south of the existing bridge and would join 180th Avenue on the west side of the river to County TT on the east side of the river.

WIS 178 would be realigned to the west to provide more room between the intersection and the river in order to avoid impacting the river. WIS 178 would also be raised at the County TT intersection 12 feet to accommodate the 7'-0" structure depth and 2'-0" freeboard above the 100-year flood elevation. The limits of reconstruction on the west side of the river would extend north of the intersection 600 feet, south of the intersection 700 feet, and west 400 feet from the river's edge.

One of the differences between Alternative 1 and 1b is that Alternative 1b would cross at-grade with the Old Abe State Trail which allows for minimal work to be done to County K. A 225-foot causeway is necessary to match the existing trail. As a result, a 12-foot wide box culvert would be added to minimize impacts to the river. In order to minimize impacts by using steeper slopes, Beam guard would be incorporated into the roadway design along both sides of the causeway for County TT and along the east side of WIS 178. The limits of reconstruction on the east side of the river would extend north of the intersection 200 feet, south of the intersection 300 feet, and east 500 feet from the river's edge. This alternative is illustrated in Exhibit 13 – Detailed Alternative 1b Map.

In addition to the impacts previously listed in Table 4, causeway impacts were also calculated and included: width of causeway at water level, quantity of causeway fill above water, and quantity of causeway fill below water as shown in Table 5 below.

Table 5
Alternative 1B Causeway Impacts

Factor	Impacts
Width of Causeway at Water Level	115 ft. (max)
Quantity of Causeway Fill Above Water Level	6,200 CY
Quantity of Causeway Fill Below Water Level	77,800 CY

Alternative 3: At Existing Location (Preferred Alternative)

During the detailed study, Alternative 3 was refined from the preliminary version to minimize overall environmental impacts by adding beam guard along the causeway. Alternative 3 would involve replacing the Cobban Bridge at the current location and would provide a crossing between WIS 178 on the west side of the river and County K on the east side of the river. This alternative utilizes the existing causeway.

The limits of reconstruction were changed based on refinements. The limits of reconstruction on the west side of the river would extend to the WIS 178 intersection, and on the east side of the river would extend to the County K intersection, stopping before the Old Abe State Trail. Therefore, there would be no construction impacts to WIS 178 or County K. Included in the roadway design is beam guard being placed along both sides of the causeway to minimize impacts to the Chippewa River. The beam guard allows for steeper ditch slopes, which reduces the overall footprint of the proposed improvements, therefore minimizing alternative impacts to wetlands and the river. Exhibit 14 – Detailed Alternative 3 Map depicts this alternative.

Alternative 5: Chippewa County R/200th Avenue

Alternative 5 was refined from the preliminary version to minimize the overall environmental impacts by moving the alternative slightly northward along the west side of the river. Alternative 5 would involve replacing Cobban Bridge about two miles north of the existing bridge and would join County R on the west side of the river and 200th Avenue on the east side of the river. The limits of reconstruction were changed since the preliminary alternatives were developed.
On the west side of the river the project limits would extend north of the WIS 178/ County R intersection 100 feet; south of the intersection 100 feet; and 700 feet to the west of the intersection.

The bridge would match grade at WIS 178 and the proposed improvements extend westward several hundred feet past the river's edge to the top of the eastern slope. This is due to the steepness of the slope and the amount of fill that would be required if the bridge ended sooner. County R would be realigned to avoid impacts to the wetland.

The limits of reconstruction on the east side of the river would extend to the east to the intersection of County K and 200th Avenue. Therefore, there would be no construction impacts to County K. In addition, the 234th Street cul-de-sac would be shifted south so as not to be connected to 200th Avenue. Alternative 5 can be seen in Exhibit 15 – Detailed Alternative 5 Map.

D. Comparison of Detailed Study Alternatives

Impacts were calculated for each of the detailed study alternatives. Impacts include: project length, construction cost, farms potentially affected, wetlands, area from farm operations, total land impacted, residential and business relocations, potentially eligible historic properties, archaeological sites, and if the Old Abe State Trail would be affected. Construction costs include removal of the existing bridge, which will be required for all of the Detailed Study Alternatives. Removal costs will be consistent among all alternatives. The options for removal ranged in costs from $1,000,000 to $3,000,000. The removal option chosen would be to use explosives, which was estimated to cost $1,000,000. Construction costs for Alternatives 1, 5, and 1b also include removal of the existing causeway, estimated at $200,000. The impacts of each alternative are summarized below in Table 6.

Comparison Factor	**1 (180th)**	**1b (180th)**	**3 (Existing) Preferred**	**5 (200th)**
Project Length (Lane Miles)	0.9	0.7	0.2	0.7
Construction Cost: ($Mil)	$11.2	$7.6	$4.7	$7.4
Farms Potentially Affected	2	1	0	2
Additional Wetland (Acres)	2.6	2.2	0	0.1
Potential Farmland (Acres)	0.6	0.5	0	3.1
Other Area Impacted (Acres)	1.9	1.0	0.117	0.8
Total Land Impacted (Acres)	2.5	1.5	0.117	3.9
Relocations	3	1	0	1
Potentially Eligible Historic Properties (not including Cobban Bridge)	0	0	0	0
Archaeological Sites	0	0	0	0
Old Abe State Trail Affected	Yes	Yes	No	No

No Build

The no build alternative would not address the project's purpose and need. Therefore, this alternative was dismissed from further consideration.

Alternative 1: 180th Avenue/County TT

Alternative 1 meets the purpose and need of the project and provides a direct link between 180th Avenue and County TT. To provide waterway clearance and to avoid the Old Abe State Trail, an extended bridge would be required for this alternative. More relocations are required with this alternative than the others. In general, the public was not in favor of this alternative. This alternative requires the most right-of-way to be acquired and impacts 2.6 acres of wetland. Alternative 1 is also the most costly alternative ($11.2 Million). Because of these impacts, this alternative was dismissed from further consideration.

Alternative 1B: 180th Avenue/County TT

Alternative 1B meets the purpose and need of the project and also provides a direct link between 180th Avenue and County TT. To provide waterway clearance and to create an at-grade crossing of the Old Abe State Trail, additional wetlands and waterway would need to be filled in along the proposed causeway. A concrete box culvert would be added to minimize floodway impacts. Alternative 1B would require one residential relocation. No archaeological sites would be impacted with this alternative. Initially, Alternative 1B was considered the preferred alternative, but on revisiting costs and impacts associated, it was determined that despite the reduction of impacts offered by Alternative 1b, there are other alternatives that meet purpose and need with fewer impacts and which are more prudent options. For these reasons this alternative was dismissed from further consideration.

Alternative 3: At Existing Location (Preferred Alternative)

Alternative 3 meets the purpose and need of the project. Alternative 3 is the most cost-effective build alternative and minimizes the overall environmental impacts because Alternative 3 utilizes the existing causeway. Since the limits of the project stop before the Old Abe State Trail, Alternative 3 avoids impacting the Old Abe State Trail. Alternative 3 has also been a preferred alternative of the public and agencies. Due to the community support, prudent construction costs, fewer relocations, no wetland impacts and less overall impacts than other alternatives, Alternative 3 is the preferred alternative.

Alternative 5: Chippewa County R/200th Avenue

Alternative 5 meets the purpose and need of the project and provides a direct link between County R and 200th Avenue. Alternative 5 also minimizes wetland impacts due to the anticipated piers in the waterway, and avoids the Old Abe State Trail. The Chippewa River's floodway and floodplain are wider at this location compared to the existing bridge location, so the bridge length is longer and the estimated construction cost ($7.4 million) is therefore higher than Alternative 3. There are more farms impacted compared to the other build alternatives, and Alternative 5 requires 3.9 acres of highway right-of-way acquisition. Because other alternatives meet the project's purpose and need with fewer impacts, this alternative was dismissed.

3. Description of Proposed Action

Alternative 3: At Existing Location was selected as the Preferred Alternative. Alternative 3 can be seen in Exhibit 16 – Preferred Alternative 3 Map.

If Alternative 3 is approved, the existing Cobban Bridge would be removed, including piers and abutments. The proposed structure would utilize the existing causeway and would consist of a 6-span bridge located on the existing bridge alignment. The new superstructure is composed of 3-span prestressed girder to the east and 3-span haunched concrete slab to the west. There would be a total of five piers constructed in the river. The piers would be constructed using either a barge or a temporary causeway, to be determined by the contractor.

Alternative 3 proposes to address the structural and functional limitations of the existing bridge, to improve circulation for area travelers, school buses, emergency vehicles, and large farm equipment. Additionally, Alternative 3 received support from the public and local government.

Alternative 3 would minimize impacts to natural resources, would have no impacts to agricultural operations, would require no relocations, and would avoid impacts to the Old Abe State Trail. At 30% design completion, the Preferred Alternative was determined to have no impacts to wetlands and would require the least amount of real estate acquisition. (Impacts will be confirmed during final design and all state and federal permitting would be finalized before construction.) Additionally, Alternative 3 would not impact sensitive archaeological sites. The Preferred Alternative would adversely impact a historically significant resource – the existing Cobban Bridge. Through an extensive consultation process, activities were identified to mitigate this impact, and which would be implemented as part of the project. These proposed mitigation efforts are documented in a Memorandum of Agreement consistent with the requirements of Section 106 of the National Historical Preservation Act.

4. Construction and Operational Energy Requirements

Energy consumption related to highway projects pertains to construction and operation. Construction energy is that required in raw materials and equipment to build or maintain the highway. Operational energy is the direct consumption of fuel by vehicles using the roadway. Fuel usage is affected by types of vehicles, roadway grades, and the geometric characteristics, speed, congestion and queuing caused by high traffic volume and intersection stop conditions.

The energy requirements of the detailed study alternatives are similar between the new locations but alternative 3, at existing location has less energy consumption due to less concrete work. Although construction energy is greater for the detailed study alternatives when compared to the no-build alternative, exertion of this energy now would save on operational energy of vehicles that currently cannot use the existing bridge and have to travel an additional six miles to the next river crossing. The addition of wider, safer shoulders allowing bicyclists and pedestrians to share the road would also save on the consumption of fuel.

5. Land Use Adjoining the Project and Surrounding Area

Land use surrounding the project area is predominantly agricultural, along with transportation and some limited residential uses.

6. Planning and Zoning

The proposed action is consistent with local planning and zoning. The Cobban Bridge reconstruction project is listed in on page 36 of Chippewa County's Capital Improvement Plan 2013-2017. The Cobban Bridge reconstruction project is listed on WisDOT's 2019 – 2022 final

STIP on page 282. The parcels adjacent to the proposed action are zoned for agriculture and conservation.

7. Indirect Effects and Cumulative Effects

If any of the following boxes are checked, the Pre-Screening Worksheet for EA and ER Projects For Determining the Need to Conduct a Detailed Indirect Effects Analysis found in Appendix A of the WisDOT report titled *Guidance for Conducting an Indirect Effects Analysis* must be completed and attached to this environmental document.

An alternative being carried forward for detailed consideration includes;

- ☐ Economic development as a purpose and need element of the proposed project.
- ☒ Construction of one or more new or additional through lanes.
- ☐ Construction of a new interchange or elimination of an existing interchange.
- ☐ Construction of one or more additional ramps or relocation of a ramp lane to a new quadrant on an existing interchange.
- ☐ Changing an at-grade intersection to a grade-separation with no access or a grade-separation to an at-grade intersection.
- ☐ Construction of one or more additional intersections along the mainline created by a new side road access.
- ☐ One or more new access points along a side road within 500' of the mainline.

☐ None of the above boxes have been checked, it has therefore been concluded that the proposed action will not result in indirect effects or cumulative effects.

☒ The proposed action may result in indirect effects or cumulative effects. The Pre-Screening Worksheet for EA and ER Projects For Determining the Need to Conduct a Detailed Indirect Effects Analysis attached as Exhibit 17 indicates a detailed indirect effects and cumulative effects analysis is not required.

☐ The proposed action may result in indirect effects or cumulative effects. It has been determined that a detailed indirect effects and cumulative effects analysis is required. See for the detailed analysis.

8. Environmental Justice

The proposed action would have both beneficial and adverse effects to all populations. Beneficial effects include improved safety for motorists, enhanced local mobility, and pedestrian and bike accommodations. Adverse effects would be in the form of inconveniences during construction and the proposed acquisition of highway right of way from the adjacent property owners. No disproportionate adverse impacts to low-environmental justice populations are expected to result from the proposed action. Beneficial and adverse effects would be similar for all populations. These include reduced travel, lower travel costs, better access to economic opportunity and improved emergency services.

How was information obtained about the presence of populations covered by EO 12898? *(check all that apply)*	
☒ US Census Data	☐ Survey Questionnaire
☐ Real Estate Company	☐ WisDOT Real Estate
☒ Public Involvement Meeting	☐ Local Government
☐ Official Plan	☒ Windshield Survey*
☐ Human Resources Agency Identify agency: Identify plan, approval authority and date of approval:	
☐ Other – Identify:	

*Conducting only a windshield survey is not sufficient to make a determination regarding whether or not populations are present.

Based on data obtained from the methods above, are populations covered by EO 12898 present in the project area?

a. ☒ No
b. ☐ Yes – Factor Sheet B-4 must be completed.

9. Title VI of the 1964 Civil Rights Act, the Americans with Disabilities Act or the Age Discrimination Act
Indicate whether or not issues have been identified or concerns have been expressed related to Title VI of the 1964 Civil Rights Act, the Americans with Disabilities Act or the Age Discrimination Act.
a. ☒ No – Issues related to the above laws were not identified and concerns were not expressed.
b. ☐ Yes – Issues related to the above laws were identified and/or concerns were expressed.
Explain:

10. Public Involvement

A. Public Meetings

Date (m/d/yyyy)	**Meeting Sponsor** (WisDOT, RPC, MPO, etc.)	**Type of Meeting** (PIM, Public Hearings, etc.)	**Location**	**Approx. Number of Attendees**
9/8/2014	Chippewa County	Local Officials Meeting #1	Cornell City Hall	14
9/8/2014	Chippewa County	Public Involvement Meeting #1	Cornell Elementary School	52
9/9/2014	Chippewa County	Public Involvement Meeting #2	Chippewa County Courthouse	26
1/5/2016	Chippewa County	Local Officials Meeting #2	Cornell City Hall	15
1/5/2016	Chippewa County	Public Involvement Meeting #3	Cornell Middle/High School	86
1/6/2016	Chippewa County	Public Involvement Meeting #4	Chippewa County Highway Department	56
8/28/2017	Chippewa County	Public Involvement Meeting #5	Chippewa County Highway Department	62
12/5/18	Chippewa County	Section 106 Consultation	Chippewa County Courthouse	17
2/27/19	Chippewa County	Section 106 Consultation	Chippewa County Courthouse	15

B. Other methods such as those identified in the Public Involvement Plan and Environmental Justice Plan (if applicable):

A web page on Chippewa County's official website was created and will be maintained throughout the project. http://www.co.chippewa.wi.us/government/highway/cth-tt-cobban-bridge-update. Invitations to each event were mailed to those within the project limits and special interest groups and a news release with the meeting details was advertised before each meeting.

C. Identify groups that participated in the public involvement process. Include any organizations and special interest groups including but not limited to: Native Americans, Cornell School District, Tom's Sales & Service (school bus contractor), Chippewa County Sheriff's Patrol Division, Chippewa County Historical Society, Jim Town Railrunners Snowmobile Club, property owners, and local government

A consulting parties list was developed throughout the project and can be found in the project file.

D. Indicate plans for additional public involvement, if applicable: Coordination with local governments and agencies is ongoing.

11. Briefly summarize the results of public involvement.

A. Describe the issues, if any, identified by individuals or groups during the public involvement process:

Throughout the project, there has been some opposition to removing the existing Cobban Bridge, due to the nostalgia, unique character and aesthetics of the historic structure. The public has enjoyed utilizing and viewing the bridge, as well as having a historic structure. The public also thought the Cobban Bridge drew people to the area. Several people strongly wished that the Cobban Bridge could be saved and turned into a pedestrian bridge. Many others were concerned about the safety and cost to maintain the existing bridge and wanted to see the bridge taken down and replaced with a new, up to current standards structure. The Cornell School District couldn't use the bridge and was in favor of a new bridge. Chippewa County Sheriff's Patrol Division was in favor of a new bridge near the existing location where officers could quickly cut across as opposed to the one lane, 5 mph bridge that would delay them. Some locals were concerned that tractors, emergency medical service vehicles, and fire trucks could not currently use the existing bridge and would like a new bridge that they all could utilize.

Cornell citizens were, in general, opposed to Alternative 5, thinking Alternative 5 was too close to Cornell and would cause people to bypass Cornell completely and would hurt their businesses and economy. A few people thought that the low ADT did not warrant a structure at the current Cobban Bridge location, but the overwhelming majority were in favor of keeping some sort of structure in the area.

B. Briefly describe how the issues identified above were addressed:

Throughout the Public Involvement Meetings, public concerns were documented and analyzed. Rehabilitation options were fully evaluated in an effort to preserve the historic bridge. The results of that research was shared with the public through slides and an explanation by a structural engineer who was also available to answer questions. A comprehensive consultation process, compliant with Section 106 of the National Historic Preservation Act, has resulted in a set of activities to mitigate the impact of removing the historic resource.

Alternative 3 was refined to minimize environmental impacts, acquisitions, and overall cost.

12. Local/regional/tribal/federal government coordination

A. Identify units of government contacted and provide the date coordination was initiated.

Unit of Government (MPO, RPC, City, County, Village, Town, Tribal, Federal, etc.)	**Coordination** Correspondence Attached (Yes/No)	**Coordination Initiation Date** (m/d/yyyy)	**Coordination Completion Date** (m/d/yyyy)	**Comments**
Cornell School District	Yes	5/28/2014	Ongoing	Requested and received comments regarding current and anticipated use of the structure in school bus routes.
Chippewa County Emergency Management	No	5/28/2014	Ongoing	Requested and received comments regarding current and anticipated use of the structure from emergency services personnel.
Cornell Emergency Services	Yes	5/28/2014	Ongoing	
Chippewa County Highway Committee	No	8/21/2014	Ongoing	
Chippewa County Board	No	8/21/2014	Ongoing	

Town of Eagle Point	Yes	8/21/2014	Ongoing	Voted in support of Alternative 3 at 1/18/2016 Town Board Meeting.
Town of Arthur	Yes	8/21/2014	Ongoing	
City of Cornell	Yes	8/21/2014	Ongoing	

See Exhibit 18 – Local Officials Involvement.

B. Describe the issues, if any, identified by units of government during the public involvement process:
The City of Cornell was concerned that Alternative 5 would take away from their business/economy.

The Town of Eagle Point was in favor of Alternative 3, the least expensive of the build alternatives and did not increase vehicular traffic/trucks on 180th Avenue.

C. Briefly describe how the issues identified above were addressed:
Alternative 5 was dismissed from evaluation.

The Town of Eagle Point's concerns were noted and incorporated in the presentations to the Chippewa County Highway Committee and Chippewa County Board Meeting. Alternative 3 was selected as the preferred alternative.

D. Indicate any unresolved issues or ongoing discussions:

None.

13. Public Hearing Requirement

☐ This document is an Environmental Assessment.
- ☐ A Notice of Opportunity to Request a Public Hearing **will be** published, or,
- ☐ A Public Hearing **will be** held.

☒ This document is a Type 2c Categorical Exclusion / Environmental Report.
- ☐ A substantial amount of right-of-way **will** be acquired.
- ☐ The proposed action **will** substantially change the layout or functions of connecting roadways or of the facility being improved.
- ☐ The proposed action **will** have a substantial adverse impact on abutting property.
- ☐ The proposed action **will** have other substantial social, economic, environmental effects.
- ☐ The department has made a determination that a public hearing is in the public interest.

☒ None of the above boxes have been checked, it has therefore been concluded that a Notice of Opportunity to Request a Public Hearing **will not** be published and a Public Hearing **is not** required, or,
- ☐ A Notice of Opportunity to Request a Public Hearing **will be** published, or,
- ☐ A Public Hearing **will be** held.

Note: For federally-funded projects, FHWA signature of this environmental document indicates concurrence with the department's Public Hearing requirement determination.

BASIC SHEET 4 – TRAFFIC SUMMARY MATRIX

	ALTERNATIVES/SECTIONS					
	Alternative 3*					
TRAFFIC VOLUMES						
Base Yr. AADT Yr. 2009	260					
Const. Yr. AADT Yr. 2018	270					
Const. Plus 10 Yr. AADT Yr. 2028	300					
Design Yr. AADT Yr. 2038	330					
DHV Yr. 2038	66					
TRAFFIC FACTORS						
K [☐ 30 /☒ 100/☐ 250] (%)	19.8%	%	%	%	%	%
D (%)	60%	%	%	%	%	%
Design Year T (% of AADT)	4.8%	%	%	%	%	%
T (% of DHV)	4%	%	%	%	%	%
Level of Service	A					
SPEEDS						
Existing Posted	5 mph					
Future Posted	35 mph					
Design Year Project Design Speed	40 mph					
OTHER *(specify)*						
P (% of AADT)	45.6%	%	%	%	%	%
K_8 (% OF AADT)	N/A	%	%	%	%	%
Other						

AADT = Annual Average Daily Traffic
K [$_{30/100/200}$] : K_{30} = Interstate, K_{100} = Rural, K_{250} = Urban, % = AADT in DHV
T = Trucks
DHV = Design Hourly Volume
D = % DHV in predominate direction of travel
P = % AADT in peak hour
K_8 = % AADT occurring in the average of the 8 highest consecutive hours of traffic on an average day (required only if CO analysis is required).

*Forecast was completed for only Alternative 3 (Reconstructing the Cobban Bridge at its existing location). The other alternatives did not require a forecast due to the low AADT on the existing Cobban Bridge.

1. Identify the agency that generated the data included in the Traffic Summary Matrix.
   WisDOT Central Office Traffic Forecasting Unit

2. Identify the date (month/year) that the traffic forecast data included in the Traffic Summary Matrix was developed.
   July 2015

3. Identify the methodology and/or computer program(s) used to develop the data included in the Traffic Summary Matrix.
   HCS 2010

4. If a metric other than Annual Average Daily Traffic (AADT) is used for describing traffic volumes such as Average Annual Weekday Traffic (AWDT), explain why a different metric was used and how it compares to AADT.
   N/A

BASIC SHEET 5 – AGENCY AND TRIBAL COORDINATION

Agency	Coordination Required?	Correspondence Attached?	Comments
WisDOT			
Region Real Estate Section	☐ No	N/A	
	☒ Yes	☐ Yes ☒ No	No inhabited houses or active businesses would be acquired.
Bureau of Aeronautics	☒ No	N/A	Coordination is not required. The project is not located within 5 miles of a public or military use airport.
	☐ Yes	☐ Yes ☐ No	Coordination has been completed and project effects have been addressed. Explain:
Railroads and Harbors Section	☒ No	N/A	Coordination is not required because no railways or harbors are in or planned for the project area.
	☐ Yes	☐ Yes ☒ No	Coordination has been completed and project effects have been addressed. Explain:
STATE AGENCY			
Natural Resources (DNR)	☒ Yes	☒ Yes ☐ No	May 15, 2014 – Initial letter was sent to DNR with information regarding the project July 30, 2014 – A letter was received from DNR that identified several concerns: November 6, 2014 – Agency Coordination Meeting #1 November 11, 2014 – A letter was received from the DNR summarizing and providing additional information on what was discussed at the Agency Coordination Meeting: July 28, 2015 – Agency Coordination Meeting #2 August 14, 2015 – An email was received from DNR stating their support of Alternative 5 because it is a practicable alternative with minimum impacts. September 23, 2015 – Agency Coordination Meeting #3 October 22, 2015 – An email was sent to the DNR and USACE with a link to the Location Study Report, highlighting Alternative 1B, then considered the preferred alternative. October 29, 2015 – An email was received from the DNR stating that Alternative 1B was an acceptable alternative from their perspective. October 7, 2016 – An email was sent stating the results for the natural habitat assessments, requesting a database search for the Northern Long Eared Bat, and requesting clarification on a few items in the Initial Review Letter as follows: October 10, 2016 – An email was received from the DNR addressing requests as follows: October 2017 – Call and Letter with DNR updating preferred alternative to Alternative 3 – discussion on concerns including purple wartyback mussel and how to remove existing bridge. DNR agreed explosives could be used to remove bridge. DNR agreed that Alternative 3 would be an acceptable option and with modifications has the least impacts to wetlands and other natural resources. April 22, 2019 – Leah Nicol confirmed after speaking with mussel expert that a mussel survey must be complete before construction and purple wartyback mussel must be relocated if found. The survey requirement would be a commitment for contractor to complete.
State Historic Preservation Office (SHPO)	☒ Yes	☒ Yes ☐ No	August 15, 2016 – SHPO concurred with the project's Section 106 evaluation and directed moving on to Step 4 – Assessing Effects. Signed MOA included as attachment 28.
Agriculture (DATCP)	☒ Yes ☐ No	☒ Yes ☐ No	November 30, 2016 – Initial Coordination letter sent to DATCP. December 2, 2016 – Alice Halpin, DATCP replied with letter stating the determination that an AIS will not be prepared for this project. See Exhibit 21-DATCP Correspondence.

Other (identify) WisDOT Cultural Resources	☒ Yes ☐ No	☒ Yes ☐ No	WisDOT's cultural resources office participated in Section 106 consultation. See the Document for Consultation.
FEDERAL AGENCY			
U.S. Army Corps of Engineers (USACE)	☒ Yes ☐ No	☒ Yes ☐ No	May 15, 2014 - Initial letter was sent to USACE with information regarding the project. USACE was invited to all three agency coordination meetings (November 26, 2014, July 28, 2015, and September 23, 2015) but declined. October 22, 2015 – An email was sent to the DNR and USACE with a link to the Location Study Report, with the Alternative 1B. November 24, 2015 – An email was received from Rebecca Graser (USACE) commenting on the Location Study Report and detailed study alternatives listed therein. USACE requested to be included in any agreements with SHPO. 2017 – USACE sent letter with updated preferred alternative from 1B to Alternative 3. January-December 2019 – USACE coordinated to review the draft MOA. Coordination attached in Exhibit 22-USACE Correspondence.
U.S. Fish and Wildlife Service (USFWS)	☒ Yes ☐ No	☒ Yes ☐ No	May 15, 2014 - Initial letter was sent to USFWS with information regarding the project. June 6, 2014 – A letter was received from USFWS stating • No federally-listed, proposed, or candidate species would be expected within the project area. • Migratory birds nesting on bridges must not be disturbed. • Recommendation that bridges and abutments be designed to allow terrestrial wildlife to pass under bridge without entering the river during normal flow conditions. • There is a potential for bald eagles to be within the project area. Follow guidance on avoiding disturbance of bald eagles. If there is an active bald eagle nest within the project area, contact the USFWS office for further guidance. • A wetland mitigation plan should be developed if wetland disturbance cannot be avoided. See Exhibit 23-USFWS Correspondence.
Natural Resources Conservation Service (NRCS)	☒ Yes ☐ No	☒ Yes ☐ No	December 8, 2016 – Initial Coordination letter and Farmland Impact Rating Form was sent to NRCS. Each site assessment score was below 60, so it is not subject to FPPA (Farmland Protection Policy Act). See Exhibit 24 - NRCS Correspondence.
U.S. National Park Service (NPS)	☐ Yes ☒ No	☐ Yes ☒ No	
U.S. Coast Guard (USCG)	☐ Yes ☒ No	☒ Yes ☐ No	August 16, 2017 – Initial Coordination letter was sent to USCG. September 14, 2017 – Coast Guard responds that they have no jurisdiction over Chippewa River at this location. No further coordination required. See Exhibit 25–USCG Correspondence.
U.S. Environmental Protection Agency (EPA)	☐ Yes ☒ No	☐ Yes ☒ No	Coordination not required for ERs.
Advisory Council on Historic Preservation (ACHP)	☐ Yes ☒ No	☐ Yes ☒ No	
Other (identify)	☐ Yes ☐ No	☐ Yes ☐ No	
SOVEREIGN NATIONS			

American Indian Tribes	☒ Yes	☒ Yes	May 15, 2014 - Initial notification and request for comments concerning historic properties letter was sent to tribes. June 2, 2014 – Letter was received from Lac du Flambeau Band of Lake Superior Chippewa Indians Tribal Historic Preservation Office. Tribes were invited to Public Involvement Meetings held on August 8, 2014 and January 5, 2016. They did not attend. See Exhibit 26-Tribal Correspondence.

BASIC SHEET 6 – ALTERNATIVES COMPARISON MATRIX

All estimates including costs are based on conditions described in this document at the time of preparation in the year of expenditure (YOE). Additional agency or public involvement may change these estimates in the future.

		Alternatives/Sections					
PROJECT PARAMETERS	**Unit of Measure**	**No Build[1]**	Alt 1	Alt 1b	**Alt 3***	Alt 5	
Project Length	Miles	0	0.9	0.7	0.2	0.7	
PRELIMINARY COST ESTIMATE (YOE)							
Construction	Million $	1.2	11.2	7.6	4.7	7.4	
Real Estate	Million $	0	0.01	0.01	0.01	0.01	
TOTAL	Million $	1.2	11.2	7.6	4.7	7.4	
LAND CONVERSIONS							
Total Area Converted to ROW	Acres	0	2.5	1.5	0.1	3.9	
REAL ESTATE							
Number of Farms Affected	Number	0	2	1	0	2	
Total Area Required From Farm Operations	Acres	0	0.6	0.5	0	3.1	
AIS Required		☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☐ No
Farmland Rating	Score	43	49	49	43	59	
Total Buildings Required	Number	0	3	1	0	1	
Housing Units Required	Number	0	3	1	0	1	
Commercial Units Required	Number	0	0	0	0	0	
Other Buildings or Structures Required	Number & Type	0	0	0	0	0	
ENVIRONMENTAL FACTORS							
Indirect Effects		☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☐ No
Cumulative Effects		☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☐ No
Environmental Justice Populations		☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☐ No
National Register Eligible Historic Structures in the Area of Potential Effect	Number	1	1	1	1	1	
National Register Eligible Archeological Sites in the Area of Potential Effect	Number	0	0	0	0	0	
Burial Site Protection *(authorization required)*		☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☐ No
106 MOA Required		☒ Yes ☐ No	☒ Yes ☐ No	☒ Yes ☐ No	☒ Yes ☐ No	☒ Yes ☐ No	☐ Yes ☐ No
Section 4(f) Evaluation Required		☒ Yes ☐ No	☒ Yes ☐ No	☒ Yes ☐ No	☒ Yes ☐ No	☐ Yes ☒ No	☐ Yes ☐ No
Section 6(f) Land Conversion Required		☐ Yes ☒ No	☒ Yes ☐ No	☒ Yes ☐ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☐ No
Flood Plain		☐ Yes ☒ No	☒ Yes ☐ No	☒ Yes ☐ No	☒ Yes ☐ No	☐ Yes ☒ No	☐ Yes ☐ No
Unique Upland Habitat Identified		☐ Yes ☒ No	☒ Yes ☐ No	☐ Yes ☒ No	☐ Yes ☒ No	☒ Yes ☐ No	☐ Yes ☐ No
Total Wetlands Filled	Acres	0	2.6	2.2	0	0.1	
Stream Crossings	Number	1	1	1	1	1	
Threatened/Endangered Species		☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No
Noise Analysis Required Receptors Impacted	Number	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☐ No
Contaminated Sites	Number	0	1	0	0	0	

[1]The estimated cost of routine maintenance through the design year should be included in the "Construction" box for the No Build alternative.

*** Preferred Alternative**

BASIC SHEET 7 – EIS SIGNIFICANCE CRITERIA

In determining whether a proposed action is a "major action significantly affecting the quality of the human environment," the proposed action must be assessed in light of the following criteria (1) if significant impact(s) will result, the preparation of an environmental impact statement (EIS) should commence immediately. Indicate whether the issue listed below is a concern for the proposed action or alternative and (2) if the issue is a concern, explain how it is to be addressed or where it is addressed in the environmental document.

1. Will the proposed action stimulate substantial indirect environmental effects?
   - ☒ No
   - ☐ Yes – Explain or indicate where addressed.

2. Will the proposed action contribute to cumulative effects of repeated actions?
   - ☒ No
   - ☐ Yes – Explain or indicate where addressed.

3. Will the creation of a new environmental effect result from this proposed action?
   - ☒ No
   - ☐ Yes – Explain or indicate where addressed.

4. Will the proposed action impact geographically scarce resources?
   - ☒ No
   - ☐ Yes – Explain or indicate where addressed.

5. Will the proposed action have a precedent-setting nature?
   - ☒ No
   - ☐ Yes – Explain or indicate where addressed.

6. Is the degree of controversy associated with the proposed action high?
   - ☒ No
   - ☐ Yes – Explain or indicate where addressed.

7. Will the proposed action be in conflict with official agency plans or local, state, tribal, or national policies, including conflicts resulting from potential effects of transportation on land use and transportation demand?
   - ☒ No
   - ☐ Yes – Explain or indicate where addressed.

BASIC SHEET 8 – ENVIRONMENTAL COMMITMENTS

Attach a copy of this page to the design study report and the PS&E submittal package.

Factor Sheet	**Commitment** (If none, include "No special or supplemental commitments required.")
A-1 General Economics	No special or supplemental commitments required.
A-2 Business	No special or supplemental commitments required.
A-3 Agriculture	No special or supplemental commitments required.
B-1 Community or Residential	No special or supplemental commitments required.
B-2 Indirect Effects	No special or supplemental commitments required.
B-3 Cumulative Effects	No special or supplemental commitments required.
B-4 Environmental Justice	No special or supplemental commitments required.
B-5 Historic Resources	Required mitigation activities stipulated include: 1. Photographic Documentation of the Cobban Bridge. The Chippewa County Project Manager will ensure fulfillment of this commitment. Photographs must be taken before Cobban Bridge is removed. 2. Good Faith Effort to Facilitate Relocation of the Existing Cobban Bridge. The WisDOT Project Manager will ensure fulfillment of this commitment. 3. Permanent Public Historical Display. The Chippewa County Historical Society will ensure fulfillment of this commitment and will begin within three months of the MOA being signed.
B-6 Archaeological/Burial Sites	No special or supplemental commitments beyond STSPs is needed.
B-7 Tribal Coordination/Consultation	The Lac du Flambeau Band of Lake Superior Chippewa Indians Tribal Historic Preservation Office requested notification upon determination of historic or archaeological resources in the project area. The Tribal contact was invited to become a consulting party in the Section 106 consultation; no response was received, and the tribe did not participate. This commitment has been completed.
B-8 Section 4(f) and 6(f) or Other Unique Areas	No special or supplemental commitments required
B-9 Aesthetics	No special or supplemental commitments required.
C-1 Wetlands	No special or supplemental commitments required.

C-2 Rivers, Streams and Floodplains	In order to protect developing fish eggs and substrate for aquatic organisms, all in-stream work that could adversely impact water quality will not be undertaken from March 15th to June 15th. The WisDOT construction Project Manager will monitor and ensure fulfillment of this commitment which will be noted in the construction notes. For work involving waterbodies: All equipment will be properly cleaned and disinfected to address the spread of invasive species and viruses. STSP 107-055 Environmental Protection – Aquatic Exotic Species Control will be followed to reduce the spread of invasive species. The WisDOT construction Project Manager will monitor and ensure fulfillment of this commitment which will be noted in the construction notes. Navigational aids will be placed around the construction area during construction. A Waterway Marker Application and Permit (DNR) along with a local ordinance will be acquired by the WisDOT Construction Project Manager prior to the start of construction. The WisDOT Construction Project Manager will be ensure fulfillment of this commitment. Floodplain permits will be obtained through Chippewa County. The WisDOT Construction Project Manager will ensure fulfillment of these commitments. STSP 203-015, *Removing Old Structure Over Waterway* will be used for this project. The WisDOT construction Project Manager will monitor and ensure fulfillment of this commitment.
C-3 Lakes or other Open Water	No special or supplemental commitments required.
C-4 Groundwater, Wells and Springs	No special or supplemental commitments required.
C-5 Upland Wildlife and Habitat	No special or supplemental commitments required.
C-6 Coastal Zones	No special or supplemental commitments required.

C-7 Threatened and Endangered Species	There is evidence of past migratory bird nesting on the existing structure. The project will utilize measures to prevent nesting only while existing bridge remains standing if work will occur outside of August 30 to May 1. If netting is used, it will be properly maintained and removed as soon as the nesting period is over. The WisDOT construction Project Manager will monitor and ensure fulfillment of this commitment which will be noted in the construction notes. To avoid/minimize potential impact to the Wood Turtle and Blanding's Turtle, exclusion fencing will be installed around the work area according to the Amphibian and Reptile Exclusion Fencing Protocols including: 1. Fencing must be installed prior to any ground disturbance activities 2. Fencing should be installed around the entire disturbance area unless suitable habitat is not present around the entire disturbance area and approach has been received from DNR staff. 3. Exclusion fencing must be installed with the fence stakes placed on the construction side of the fence. 4. Fencing must be at least 24 inches high with at least 4 inches trenched into the soil and at least 20 inches exposed above ground. 5. Fencing should be installed with turn-arounds at ends and at any access openings needed in the fencing in order to redirect animals away from openings. The WisDOT construction Project Manager will monitor and ensure fulfillment of this commitment which will be noted in the construction notes. To avoid/minimize potential impacts to the Lake Sturgeon, in-stream work will be avoided from late April through early June. The WisDOT construction Project Manager will monitor and ensure fulfillment of this commitment which will be noted in the construction notes. Mussel survey will need to take place prior to construction and if purple warty back mussels are present, they must be relocated before construction. The WisDOT Project Manager and the project Environmental Coordinator will coordinate with DNR to ensure fulfillment of this commitment which will be noted in the construction notes.
D-1 Air Quality	No special or supplemental commitments required.
D-2 Construction Stage Sound Quality	No special or supplemental commitments required.
D-3 Traffic Noise	No special or supplemental commitments required.
D-4 Hazardous Substances or Contamination	No special or supplemental commitments required.
D-5 Storm Water	No special or supplemental commitments required.
D-6 Erosion Control	If erosion mat is used along stream beds, biodegradable and non-netted mat will be used. The WisDOT construction Project Manager will monitor and ensure fulfillment of these commitments.
E- Other	Local ordinances regarding navigational aids and slow-no-wake-zones around construction area will be followed. The WisDOT construction Project Manager will monitor and ensure fulfillment of this commitment which will be noted in the construction notes.

BASIC SHEET 9 – ENVIRONMENTAL FACTORS MATRIX *(check all that apply)*

Factors	Adverse	Benefit	None Identified	Factor Sheet Attached	Note: If the effects on the environmental factor can't be adequately summarized in several sentences, the Factor Sheet for the environmental factor must be included. Effects
A. ECONOMIC FACTORS *Factor Sheet A-1, General Economics, must be included if Factor Sheet A-2 or A-3 is completed.*					
A-1 General Economics	☐	☒	☐	☒	The new bridge will better serve the community by providing more efficient and safer traffic operations.
A-2 Business	☐	☒	☐	☐	This project will benefit businesses by providing an additional Chippewa River crossing, improving access for all users.
A-3 Agriculture	☐	☒	☐	☐	This project will benefit farmers who were unable to utilize the existing Cobban Bridge with farm equipment due to height and width restrictions.
B. SOCIAL/CULTURAL FACTORS					
B-1 Community or Residential	☒	☒	☐	☒	With the improvements, the new bridge and roadway will better serve the community by providing more efficient and safer traffic operations.
B-2 Indirect Effects	☐	☐	☒	☐	See Exhibit 17-Prescreening Worksheet. The project will not have the likelihood to result in significant indirect effects as defined by NEPA.
B-3 Cumulative Effects	☐	☐	☒	☐	The project will not have the likelihood to result in significant cumulative effects as defined by NEPA.
B-4 Environmental Justice	☐	☐	☒	☒	This project will not disproportionately affect any populations covered by EO 12898.
For B-5 through B-8, if any of these resources are present on the project, involve the REC early because of possible project schedule implications.					
B-5 Historic Resources	☒	☐	☐	☒	The Cobban Bridge is determined eligible for the National Register of Historic Places and therefore the project will have an adverse effect on the Cobban Bridge. See Factor Sheet B-5 and Exhibit 20-SHPO Coordination.
B-6 Archaeological/Burial Sites	☐	☐	☒	☐	All archaeological/burial sites were avoided by design therefore there are no adverse effects to archaeological/burial sites.
B-7 Tribal Coordination /Consultation	☐	☐	☒	☐	All archaeological/burial sites were avoided by design. Initial Coordination letters were sent on May 15, 2014.
B-8 Section 4(f) and 6(f) or Other Unique Areas	☐	☐	☒	☐	Not applicable to this project since no USDOT funds are being used on the project.
B-9 Aesthetics	☐	☒	☐	☐	The existing historic bridge will be removed and replaced with a new, larger, up to current design standards structure.
C. NATURAL RESOURCE FACTORS					
C-1 Wetlands	☐	☐	☒	☐	Wetland impacts were avoided through design. At 30% design, it was determined that no wetlands will be impacted.
C-2 Rivers, Streams and Floodplains	☒	☒	☐	☐	The project maintains the existing causeway.
C-3 Lakes or Other Open Water	☐	☐	☒	☐	This project will not affect any lakes or open water.
C-4 Groundwater, Wells, and Springs	☐	☐	☒	☐	This project will not affect any groundwater, wells, or springs.
C-5 Upland Wildlife and Habitat	☐	☐	☒	☐	There are no upland wildlife and habitat concerns with this project.
C-6 Coastal Zones	☐	☐	☒	☐	This project will not affect any coastal zones.
C-7 Threatened and Endangered Species	☒	☐	☐	☒	There may be impacts to threatened or endangered species. See Factor Sheet C-7 and Exhibit 19-DNR Coordination and Exhibit 23-USFWS Coordination.
D. PHYSICAL FACTORS					
D-1 Air Quality	☐	☐	☒	☐	No substantial impacts to air quality are expected.
D-2 Construction Stage Sound Quality	☐	☐	☒	☐	No substantial noise is expected.

D-3 Traffic Noise	☐	☐	☒	☐	No substantial noise is expected.
D-4 Hazardous Substances or Contamination	☐	☐	☒	☐	One contaminated site was identified but will be avoided through design. The project was designed to avoid the contaminated sites. See Factor Sheet D-4.
D-5 Stormwater	☐	☐	☒	☐	No change to the current system.
D-6 Erosion Control and Sediment Control	☐	☐	☒	☐	
E. OTHER FACTORS					
E-1	☐	☐	☐	☐	
E-2	☐	☐	☐	☐	

HISTORIC RESOURCES EVALUATION

Wisconsin Department of Transportation

Factor Sheet B-5

Alternative Alt 3: At Existing Location	Total Length of Center Line of Existing Roadway 0.2 miles Length of This Alternative 0.2 miles
Preferred ☒ Yes ☐ No ☐ None identified	

Section 106 Form or other documentation, with all necessary approvals, must be attached to the Environmental Document for all projects.

1. Parties contacted:

Parties Contacted	Date Contacted	Comments Received		
		No	Yes	Check if Attached
Tribes	5/14/2014		x	☒
Local Officials, landowners, special interest groups (including Chippewa County Historical Society), tribes	8/21/2014 (letter), 9/8-9/2014 (PIM), 12/23/2015(letter), 1/5-6/2016 (PIM)		x	☒
WisDOT Historic Preservation Officer	7/18/2016		x	☐
State Historic Preservation Officer	7/20/2016		x	☐
Consulting Parties	11/2018		x	☒
				☐
				☐
				☐
				☐
				☐

2. Property Name: Cobban Bridge

3. Location: Town of Cobban, Chippewa County

4. Use: Vehicular Bridge

5. Property type:
- ☒ Bridge
- ☐ Building
- ☐ Historic District
- ☐ Other: _____

6. Property Designations:
- ☐ National Historic Landmark (NHL)
- ☒ National Register of Historic Places (NRHP) *not listed, but determined eligible*
- ☐ State Register of Historic Places
- ☐ Local Registry
- ☐ Tribal Registry

7. A Determination of Eligibility (DOE) has been prepared:
- ☐ No - Property is already on NRHP or NHL.
- ☒ Yes - DOE prepared.
- ☐ Other: _____

8. Describe the significance of the structures and/or buildings:

The structure is the last two-span Pennsylvania overhead truss type structure in the State of Wisconsin. It has been determined by the Wisconsin Historical Society to be eligible for the National Register of Historic Places. It has also been acknowledged with a Wisconsin Historical Society Historical Marker and documented by the National Park Service for the Historic American Engineering Record (HAER) – the resulting data being housed at the Library of Congress in Washington, D.C.

9. In compliance with the requirements of Section 106, of the National Historic Preservation Act, the proposed project's effects on the historic property, (e.g., structure or building) have been evaluated in the following report, a copy of which is:

☐ In the project file, or

☒ Attached to this document:

- ☐ Documentation for determination of no historic properties affected (Reported on the Section 106 Review Form).
- ☐ Documentation for determination of no adverse or conditional no adverse effect to historic properties.
- ☒ Documentation for Consultation about adverse effect(s). A Memorandum of Agreement has been completed.
  - ☐ No. Consultation about effects is continuing.
  - ☒ Yes, a copy of the MOA is attached to this document. Summarize MOA stipulations below:
    - Photodocumentation of existing Cobban Bridge prior to demolition
    - Marketing the Cobban Bridge for relocation and/or salvage of bridge elements
    - Permanent historical display near the site of the existing bridge documenting its historical significance

10. Do FHWA requirements for Section 4(f) apply to the project's use of the historic property?

☒ No

- ☒ Project is not federally funded.
- ☐ No right-of-way or Permanent Limited Easements will be acquired from the property and the project will not substantially impair the characteristics that qualify the property for the NRHP.
- ☐ Right-of-way will be acquired from the NRHP property but a *de minimus* finding has been proposed.
- ☐ Other – Explain:

☐ Yes – Complete Factor Sheet B-8, Section 4(f) and 6(f) or other Unique Areas.

THREATENED AND ENDANGERED SPECIES EVALUATION

Wisconsin Department of Transportation

Factor Sheet C-7

Alternative Alt 3: At Existing Location	Total Length of Center Line of Existing Roadway 0.2 miles Length of This Alternative 0.2 miles
Preferred ☒ Yes ☐ No ☐ None identified	

1. Are there any known threatened or endangered species in the vicinity of the project?

☐ None identified

☒ Yes - Identify the species and indicate its status on Federal or State lists:

Species Common Name	Species Scientific Name	Federal Status	State Status	Affected by Project? Y/N
Plants				
Animals				
Bald Eagle	Haliaeetus leucocephalus	Protected	Special Concern	N
Purple Wartyback	Cyclonaias tuberculate	None	Endangered	Y/N (will relocate if present)
Wood Turtle	Glyptemys insculpta	None	Threatened	Y
Lake Sturgeon	Acipenser fulvescens	None	Special Concern	N
Blanding's Turtle	Emydoidea blandingii	None	Special Concern	Y
Northern long-eared Bat	Myotis septentrionalis	Threatened	Threatened	N
Spectaclecase (mussel)	Cumberlandia monodonta	Endangered	None	N
Karner Blue butterfly	Lycaeides melissa samuelis	Endangered	None	N
Gray Wolf	Canis lupus	Endangered	None	N
Other				

2. Explain How a Species Is or Is Not Affected by the Action:

☒ Species Not Affected:

Bald Eagle – No large trees will be removed from March 15 – August 1.
Lake Sturgeon – All in-stream work will be avoided from late April through early June.
Northern long-eared Bat – No critical habitats within project area.
Spectalclecase (mussel) – No critical habitats within project area.
Karner Blue Butterfly – No critical habitats within project area.
Gray Wolf – No critical habitats within project area.

☒ Species Affected:

Purple Wartyback (mussel) – Survey required. Identified populations will be relocated.
Wood Turtle and Blanding's Turtle – installation of exclusion fencing will be placed around the work area, according to the Amphibian and Reptile Exclusion Fencing Protocols.

3. Describe Coordination:

U.S. Fish & Wildlife Service:

☒ Has Section 7 coordination been completed?

☐ No

☒ Yes - Describe mitigation required to protect the federally listed endangered species:

There are no critical habitats for the Northern long-eared bat, Spectaclecase, Karner Blue butterfly or Gray Wolf. To protect the Bald Eagle, no large trees will be removed from March 15 – August 1.

WDNR

☒ Has coordination with DNR been completed?

☐ No

☒ Yes - Describe mitigation required to protect the state-listed species:

To protect the Bald Eagle, no large trees will be removed from March 15 – August 1. To protect the Purple Wartyback, a survey will be performed and identified populations will be relocated. To protect the Lake Sturgeon, all in-stream work will be avoided from late April through early June. To protect the turtles, installation of exclusion fencing will be performed around the work area. There is no critical habitat for the Northern long-eared bat.