State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
2984 Shawano Ave.
Green Bay, WI, 54313

Tony Evers, Governor
Karen Hyun, Ph.D., Secretary
Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711

November 24, 2025

IP-SC-2024-13-00581, 00582, and 00583

Epic Systems Corporation
Attn: Jim Schumacher
1979 Milky Way
Verona, WI 53593
[sent electronically]

RE: Amendment to Permit for Stream realignment, Bridge crossing, and Wetland Impacts, in the Town of Verona, Dane County

Dear Jim Schumacher:

We have reviewed your request to amend permit IP-SC-2024-13-00581, 00582, and 00583, which is to construct a bridge crossing over, impact wetlands adjacent to, and conduct a stream restoration (realignment) project on the Sugar River, located in the SE 1/4, NE 1/4, Section 18, Township 06N, Range 08E, Town of Verona, Dane County.

Your request is approved with certain conditions and limitations. Attached is a copy of the Permit Amendment containing new conditions, along with a copy of your original permit which is still in effect unless otherwise noted.

If you have any questions about this permit amendment, please call me at (920) 410-3181 or you can reach me by email at Crystal.VonHoldt@wisconsin.gov.

Sincerely,

Crystal Von Holdt
Waterway Program Policy Coordinator

Email CC:
Caree Kovacevich, USACE Project Manager
Roger Lane, Dane County Zoning Administrator
Holly Licht, City of Verona Clerk
Sarah Gaskell, Town Verona Planner/Administrator
Jake Donar, DNR Conservation Warden
Kyle Neeve, Tyler Tkachuk, and Zach Larson, AECOM
Shelly Allness, DNR Secretary's Director – South Central Region
Brian Cunningham, DNR Regional Waterway/Wetland Supervisor
Kyle Olivencia, DNR Fisheries Biologist
Michael Sorge, DNR Water Resources Supervisor
Camille Bruhn, DNR Water Resources Specialist
Laura Spears, DNR Stormwater Specialist
Eric Heggelund, DNR Environmental Analysis & Review Specialist
Will Disser, DNR Water Management Engineer
Pam Rood, DNR Facilities and Lands Financial Assistance Specialist
Kaylin Helm, DNR Real Estate Program
Kevin Swenson, DNR State Property Supervisor
Andy Paulios, DNR Wildlife Biologist

STATE OF WISCONSIN **PERMIT AMENDMENT**
DEPARTMENT OF NATURAL RESOURCES **IP-SC-2024-13-00581, 00582, and 00583**

PERMIT AMENDMENT

Jim Schumacher of Epic Systems Corporation, 1979 Milky Way, Verona, WI 53593 is hereby granted under Sections Ch 30.123, Ch 30.195(1), and Ch 30.208, Wisconsin Statutes, an amendment to permit number IP-SC-2024-13-00581, 00582, 00583, which authorized the permittee to construct a bridge crossing over, impact wetlands adjacent to, and conduct a stream restoration (realignment) project on the Sugar River, located in the SE 1/4, NE 1/4, Sec. 18, T. 06N, R. 08E, Town of Verona, Dane County. This is an approved amendment to modify for alternatives to timber mats, work that can take place during sensitive seasonal timeframes, and modifications for temporary causeway construction. The applicant is bound by the conditions of the original permit and by any conditions of this amendment.

AMENDED PERMIT CONDITIONS

1. All original permit conditions remain in effect, except where modified by the amended permit conditions below.

FINDINGS OF FACT

1. Jim Schumacher on behalf of Epic, 1979 Milky Way, Verona, WI 53593, filed an application with this Department on 02/29/2024, under sections Chs 30.123, 30.195(1), 30.208, and 281.36, Wis. Stats., to construct a bridge crossing over, impact wetlands adjacent to, and conduct a stream restoration (realignment) project on the Sugar River located in the SE 1/4, NE 1/4, Sec. 18, T. 06N, R. 08E, Town of Verona, Dane County.

2. Jim Schumacher was granted Permit Number IP-SC-2024-13-00581, 00582, and 00583 in December 2024. The purpose of this project is to address traffic growth, safety, and emerging and forecasted operational deficiencies on both US 18/151, between the W. Verona Avenue/Epic Lane and the County Trunk Highway (CTH) G/Dairy Ridge Road interchanges, and along CTH PD in the City and Town of Verona. Verona is one of Wisconsin's fastest growing communities (per US Census data, the population grew by over 30% between 2010 and 2020) and so the volume of traffic has reflected the growth of this community. The project consists of a proposed (currently) private roadway and bridge crossing over the Sugar River and the state trail connecting US 18/151 to Epic Campuses from the southwest along with wetland impacts for installing a utility crossing. The project proposes 3.85 ac of temporary and 9.78 permanent wetland impacts. Approximately one mile of stream relocation and restoration is proposed to be done as part of this project to bring the Sugar River back to the natural meandering as well as an additional 6.56 ac of farmed wet meadow to be restored (by means of no mow and wetland seed mix) and 3.53 ac of restoring an upland buffer along the edge of existing wetlands.

3. Consultants from AECOM filed a request on behalf of Jim Schumacher (Epic Systems Corporation) to amend the original permit on 11/10/2025 to modify design details and timing of activities authorized by the permit issued on December 3, 2024.

4. The Department has determined that the proposed amendment to the permit will not affect the Findings of Fact and Conclusions of Law of the original permit. A copy of the original permit is attached to this amendment.

CONCLUSIONS OF LAW

1. The Department has authority under the above indicated Statutes and Administrative Codes to issue a permit for the construction and maintenance of this project and under the foregoing Findings of Fact to issue an order granting the permit amendment requested.

2. The Department has complied with Section 1.11, Wisconsin Statutes, and NR 150, Wisconsin Administrative Code.

Dated at the Northeast Region Headquarters, Wisconsin on November 24, 2025.

STATE OF WISCONSIN DEPARTMENT OF NATURAL RESOURCES
For the Secretary

By:
Crystal Von Holdt
Crystal Von Holdt
Waterway Program Policy Coordinator

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
2984 Shawano Ave.
Green Bay, WI, 54313

Tony Evers, Governor

Telephone 608-266-2621
Toll Free 1-888-936-7463
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December 3, 2024

IP-SC-2024-13-00581 and 00582

Epic Systems Corporation
Attn: Jim Schumacher
1979 Milky Way
Verona, WI 53593
[sent electronically]

RE: State Waterway Ch 30 Permits to construct a bridge over and realignment of the Sugar River

Dear Mr. Schumacher:

The Department of Natural Resources has completed its review of your application for a permit to construct a bridge over and to realign a section of the Sugar River located in the SE 1/4, NE 1/4, Section 18, Township 06, Range 08E, Town of Verona, Dane County. You will be pleased to know your application is approved.

I am attaching a copy of your permit, which lists the many important conditions that must be followed to protect water quality and habitat. A copy of the permit must be posted for reference at the project site. Please read your permit conditions carefully so that you are fully aware of what is expected of you. Please note you are required to submit photographs of the completed project within 7 days after you've finished construction. This helps both of us to document the completion of the project and compliance with the permit conditions. Your next step will be to notify me of the date on which you plan to start construction and again after your project is complete.

If you have any questions about your permit, please call me at (920) 410-3181 or email Crystal.VonHoldt@wisconsin.gov.

Sincerely,

Crystal Von Holdt
Waterway Program Policy Coordinator

Email CC:
Caree Kovacevich, USACE Project Manager
Roger Lane, Dane County Zoning Administrator
Holly Licht, City of Verona Clerk
Sarah Gaskell, Town Verona Planner/Administrator
Jake Donar, DNR Conservation Warden
Kyle Neeve, Tyler Tkachuk, and Zach Larson, AECOM
Shelly Allness, DNR Secretary's Director – South Central Region
Brian Cunningham, DNR Regional Waterway/Wetland Supervisor
Kyle Olivencia, DNR Fisheries Biologist
Michael Sorge, DNR Water Resources Supervisor
Camille Bruhn, DNR Water Resources Specialist
Laura Spears, DNR Stormwater Specialist
Eric Heggelund, DNR Environmental Analysis & Review Specialist
Will Disser, DNR Water Management Engineer
Pam Rood, DNR Facilities and Lands Financial Assistance Specialist
Kaylin Helm, DNR Real Estate Program
Kevin Swenson, DNR State Property Supervisor
Andy Paulios, DNR Wildlife Biologist

STATE OF WISCONSIN
DEPARTMENT OF NATURAL RESOURCES

BRIDGE CROSSING & STREAM REALIGNMENT PERMIT
IP-SC-2024-13-00581 and 00582

Application of Jim Schumacher on behalf of Epic Systems Corporation (Epic) is hereby granted under Sections Ch 30.123, Ch 30.195(1), and Ch 30.208, Wisconsin Statutes, to construct a bridge crossing over and to realign a section of the Sugar River located in the SE 1/4, NE 1/4, Section 18, Township 06, Range 08E, Town of Verona, Dane County, subject to the following conditions:

PERMIT

1. You must notify Crystal Von Holdt at phone (920) 410-3181 or email Crystal.VonHoldt@wisconsin.gov before starting construction and again not more than 5 days after the project is complete.

2. You must complete the project as described **on or before 12/03/2027**. If you will not complete the project by this date, you must submit a written request for an extension prior to expiration of the initial time limit specified in the permit. Your request must identify the requested extension date. The Department shall extend the time limit for an individual permit or contract for no longer than an additional 5 years if you request the extension before the initial time limit expires. You may not begin or continue construction after the original permit expiration date unless the Department extends the permit in writing or grants a new permit.

3. **This permit does not authorize any work other than what you specifically describe in your final revised application and plans submitted 9/18/2024, and as modified by the conditions of this permit**. If you wish to alter the project or permit conditions, you must first obtain written approval of the Department.

4. Before you start your project, you must first obtain any permit or approval that may be required for your project by local zoning ordinances and by the U.S. Army Corps of Engineers. You are responsible for contacting these local and federal authorities to determine if they require permits or approvals for your project. These local and federal authorities are responsible for determining if your project complies with their requirements.

5. Upon reasonable notice, you shall allow access to your project site during reasonable hours to any Department employee who is investigating the project's construction, operation, maintenance, or permit compliance.

6. The Department may modify or revoke this permit for good cause, including if the project is not completed according to the terms of the permit or if the Department determines the activity is detrimental to the public interest.

7. **You must post a copy of this permit at a conspicuous location on the project site, visible from the waterway**, for at least five days prior to construction, and remaining at least five days after construction. You must also have a copy of the permit and approved plan available at the project site at all times until the project is complete.

8. Your acceptance of this permit and efforts to begin work on this project signify that you have read, understood, and agreed to follow all conditions of this permit.

9. **You must submit a series of photographs to the Department, within one week of completing work on the site**. The photographs must be taken from different vantage points and depict all work authorized by this permit.

10. You, your agent, and any involved contractors or consultants may be considered a party to the violation pursuant to Section 30.292, Wis. Stats., for any violations of Chapter 30, Wis. Stats., or this permit.

11. Construction shall be accomplished in such a manner as to minimize erosion and siltation into surface waters. Erosion control measures (such as silt fence and straw bales) must meet or exceed the technical standards of ch. NR 151, Wis. Adm. Code. The technical standards are found at: http://dnr.wi.gov/topic/stormwater/standards/const_standards.html.

12. All equipment used for the project including but not limited to tracked vehicles, barges, boats, hoses, sheet pile and pumps shall be de-contaminated for invasive and exotic viruses and species prior to use and after use. The following steps must be taken every time you move your equipment to avoid transporting invasive and exotic viruses and species. To the extent practicable, equipment and gear used on infested waters shall not be used on other non-infested waters.
    a. **Inspect and remove** aquatic plants, animals, and mud from your equipment.
    b. **Drain all water** from your equipment that comes in contact with infested waters, including but not limited to tracked vehicles, barges, boats, hoses, sheet pile and pumps.
    c. **Dispose** of aquatic plants, animals in the trash. Never release or transfer aquatic plants, animals, or water from one waterbody to another.
    d. **Wash your equipment** with hot (>140º F) and/or high-pressure water, -- OR -- Allow your equipment to **dry thoroughly for 5 days**.

STREAM RELOCATION & BRIDGE CROSSING CONDITIONS

13. Since the Sugar River is a navigable waterway and classified trout stream, construction must take place during low water periods and no in-water construction can take place between September 15th and May 15th of each calendar year to protect fish spawning, movement, and egg incubation periods.

14. This project site has high potential to contain suitable habitat (marshes/wetlands, agricultural landscapes, and woodlands) for the Rusty Patched Bumble Bee (RPBB). The following are recommended (voluntary) follow-up actions for best management practices (BMPs) during construction of the project to ensure protection of the Rusty patched bumble bee:
    a. Use native trees, shrubs, and flowering plants in landscaping.
    b. Provide plants that bloom from spring through fall (Wisconsin Native Plant Species List: https://p.widencdn.net/tanvm9/NH0936).
    c. Remove and control invasive plants in any habitat used for foraging, nesting, or overwintering.

15. This project site has potential to contain suitable habitat for the Big Brown & Tricolored Bats. Tree removal occurring as part of this project is covered for take by the *Cave Bat Broad Incidental Take Permit* and there are no required actions for this species. However, it is recommended that special consideration be given to keeping snags or dying trees intact within the project site (if present) particularly between June 1st and August 15th annually during construction.

16. Construction disturbances are to be planned during times of the year with lower flows and receded groundwater levels, if possible. Construction shall follow the planned fall-winter period for optimal construction activities. In all cases, low-pressure-tired or track driven machinery should be used along with bog mats once the ground is frozen to limit vegetation and soil impacts.

17. Phasing of the stream realignment work shall begin with off-line construction of the newly relocated channel, then move to stabilization. The new channel shall be stabilized with vegetative cover established before diverting stream flow from the pre-existing channel into the new reconstructed, meandered stream channel.
    a. Clay plugs reinforced with toe wood (root balls) with overlayed sod mats will be installed on the downstream side of each intersection between the new and “old” channels in the floodplain.
    b. Excavated materials from the channel excavation work will be used for backfilling of “old” channels and these areas will be stabilized.

18. Disposal and stockpiling (temporary and permanent) of any material associated with this project cannot be placed in wetland, floodplain, or below the ordinary high-water mark (OHWM) of any navigable waterway off-site or on-site unless specifically authorized by this permit and identified in the final plans.

19. The design and dimensions of the new channel meanders must be in accordance with the approved and final revised plans submitted on 9/18/2024.

20. The new channel's banks must be stabilized before it is opened to receive stream flow. To minimize erosion, the downstream end of the new channel must be opened first. Once the stream flow is passing through the new channel, the existing channel can be filled. The upstream and downstream end of the fill in the old channel must be protected from erosion in accordance with the final revised plans submitted on 9/18/2024 and approved by this permit.

21. The old channel must be filled with the excavated wetland material from the new channel and placed in reverse order as it was excavated to ensure the wetland topsoil is placed last (on top of the backfill). Backfilling of the old channel must not exceed the surrounding ground elevations so as to not create raised areas or berms. The top of this fill must be stabilized in accordance with the final revised plans submitted on 9/18/2024.

22. Any temporary or permanent stockpiles will have silt fence or similar erosion control practices placed along all downslope/downstream sides of the stockpiles. Stockpiles in place for more than 14 days will be either temporarily seeded or a polymer soil stabilizer applied to the stockpiled material.

23. Heavy equipment must not be used below the ordinary high-water mark during construction or for maintenance.

24. Maintenance activities may not result in the discharge or deposition of materials (for example paint, sand or abrasives, metal, or chemicals) into the stream or wetlands.

25. The bridge shall be maintained in good repair by the Owner. The Owner must periodically inspect the bridge for accumulated debris and must remove any restriction of flow. This material must be deposited at an upland location and outside of mapped floodplains. You assume all responsibility and liability for a direct or indirect damage caused or resulting from the presence of the bridge and hold the State of Wisconsin, and its employees, harmless.

26. Your bridge must provide adequate navigational clearance between the lowest invert elevation of the bridge span and the ordinary high-water mark.

27. Associated development planned in conjunction with this project (such as construction site grading or filling, for example) must conform to floodplain regulations and local zoning ordinances.

28. Use of highly visible construction fencing (or similar) shall be installed to completely surround the three existing and identified archaeological sites and between wetlands authorized for disturbance and

wetlands **not** authorized for disturbance to ensure these areas remain undisturbed and intact during all phases of construction.

29. Before construction commences, the project is required to obtain other relevant and required local, state, and federal permits such as (but not limited to) DNR Real Estate permits, DNR stormwater construction site permit coverage (for WPDES compliance), local floodplain zoning permits or approvals, etc.

30. If there are planned wastewater discharges to waters of the state, coverage under a Wisconsin Pollutant Discharge Elimination System (WPDES) wastewater general permit shall be obtained prior to the discharge. The approval process for WPDES wastewater general permits may take up to 30 days. Contact the regional wastewater specialist (Reece Matheson, (414) 345-0852, reece.matheson@wisconsin.gov) or go to https://dnr.wisconsin.gov/topic/Wastewater/GeneralPermits.html for more information.

31. A full complete copy of plans and the permit are to be provided to each contractor working on the project.

32. Erosion control measures must be in place at the end of each working day and must be inspected and any necessary repairs or maintenance performed after every rainfall event exceeding 1/2 inch and at least once per week. After the site is 80% stabilized or prior to or at the direction of the Department, all temporary erosion control measures must be removed and disposed of properly.

FINDINGS OF FACT

1. Jim Schumacher on behalf of Epic, 1979 Milky Way, Verona, WI 53593, filed an application with this Department on 02/29/2024, under sections Chs 30.123, 30.195(1), and 30.208, Wis. Stats., to construct a bridge crossing over and to realign a section of the Sugar River located in the SE 1/4, NE 1/4, Sec. 18, T. 06N, R. 08E, Town of Verona, Dane County.

2. The purpose of this project is to address traffic growth, safety, and emerging and forecasted operational deficiencies on both US 18/151, between the W. Verona Avenue/Epic Lane and the County Trunk Highway (CTH) G/Dairy Ridge Road interchanges, and along CTH PD in the City and Town of Verona. Verona is one of Wisconsin's fastest growing communities (per US Census data, the population grew by over 30% between 2010 and 2020) and so the volume of traffic has reflected the growth of this community. The project consists of a proposed (currently) private roadway and bridge crossing over the Sugar River and the state trail connecting US 18/151 to Epic Campuses from the southwest along with wetland impacts for installing a utility crossing.
    a. The bridge crossing will result in 3.85 ac of temporary and 9.78 permanent wetland impacts. The bridge crossing has a width of 87.25ft wide with a length of 903.08ft from east to west bank of the river valley. The bridge provides 2 travel lanes in each direction with each lane being 11ft wide. The bridge crossing includes a pedestrian path along the south side of the bridge. The bridge includes 9 spans spaced 95ft apart. Each pier supporting the spans for the bridge across the valley floor is 4.25ft wide and a buried footing. The spans are designed intentionally to create a clear span over Sugar Creek and over the Military Ridge State Trail (MRST).
    b. Within the footprint of the bridge crossing is a planned utility crossing that will allow utilities to extend east/west across the river valley. There are areas where this northern utility crossing will overlap with the impacts of the bridge piers (which result in a permanent wetland impact at each pier location). In the spanned bridge sections, the installation of the northern utility crossing will create a temporary impact since after the utility is installed, the ground will be restored to wetland.
    c. Approximately one mile of stream relocation and restoration is proposed to be done as part of this project to bring the Sugar River back to the natural meandering. The stream realignment will result in 14.36 acres of temporary wetland disturbances to excavate the new stream channel

meander and then use the excavated wetland material to backfill the current straightened stream channel. This will restore wetlands in the straightened stream channel. Access with use of timber mats is considered a temporary impact to wetlands and is included in this calculation of temporary impacts.

d. The existing 11.26 acres of high-quality sedge meadow wetland community on the southwest side of the MRST will remain intact with efforts to ensure this community continues to thrive as a high-quality wetland type. The sedge meadow is immediately adjacent to the Sugar River Wildlife Area.
e. An additional 6.19 acres of farmed wet meadow on the northeast side of the MRST is to be restored (by means of no mow and wetland seed mix) and coupled with an adjacent 3.53 acres of non-wetland restoration to establish an upland buffer along the edge of existing wetlands.

3. The stream restoration will return the existing straightened stream channel to the 1930s natural meander alignment. This will recreate approximately 1 mile of stream channel designed with a pool-and-riffle system along with in-channel habitat features (root wads) and natural bank stabilization using excavated and salvaged wetland sod mats. Historic ditch scars will be backfilled with excavated wetland material and eleven (11) ditch plugs will be installed to divert the stream flow into the new channel meanders. Some areas of straightened ditch channel may remain as "overflow" areas or backwater areas to create a diverse riparian community. The new meander streambanks will be stabilized using excavated wetland sod mats and toe-wood designs to incorporate natural on-site materials in the restored stream channel.

4. While the project site overlaps with and/or occurs within 1 mile of the Rusty Patched Bumble Bee (RPBB) High Potential Zone and contains suitable habitat, marshes/wetlands, agricultural landscapes, and woodlands, for the bee, there is no federal nexus for federal authority for the taking prohibition per the federal Endangered Species Act (ESA).

5. The applicant contracted UW-Milwaukee Cultural Resource Management (CRM) to complete a Phase 1 Archaeological Survey for the proposed West Road project in July 2024. The CRM report documents three archaeological sites encountered: 47DA0852, 47DA0853, and newly identified site 47DA1609 Sugar River Wetland Scatter. Sites 47DA0852 and 47DA1609 Sugar River Wetland Scatter do not meet the criteria listing on the National Register of Historic Places (NRHP) and so no additional investigations were conducted for those two sites. Site 47DA0853 showed evidence of a Late Archaic component and met the criteria for listing on the NRHP. Avoidance of Site 47DA0853 was recommended and is reflected the plans so no further investigation is necessary. The final plans designed and authorized by this permit includes avoidance of all three archaeological sites during construction and land-disturbing activities.

6. The proposed project includes a *Natural Channel Design* (NCD) approach to restore natural stream stability, establish floodplain connectivity, and to create aquatic habitat by reconfiguration of the stream using NCD principles and techniques (see National Engineering Handbook Part 654 Chapter 11 (USDA-NRCS 2007) and Applied River Morphology, Wildland Hydrology (Rosgen 1996). This approach uses principles of fluvial geomorphology and is founded on a scientific understanding of natural, stable river systems. Improvements to the surrounding floodplain riparian buffer and stream will help improve habitat and water quality, reduce bank erosion, and support the creation of a self-sustaining and resilient channel.

7. The state's Wastewater Program conveyed coverage for the applicant's project under the Wisconsin Pollutant Discharge Elimination System (WPDES) Dewatering General Permit (WI-0049344-05-0) on February 28, 2024. If there are additional planned wastewater discharges to waters of the state from the applicant's transportation project (e.g., additional dewatering, discharges from dredged materials), additional coverage under a WPDES general permit must be obtained prior to the discharge. For questions about obtaining coverage under a WPDES general permit, contact the Reece Matheson [phone (414) 345-0852, email reece.matheson@wisconsin.gov] for the WPDES Dewatering General Permit (WI-

0049344-05-0) or Susan Eichelkraut [phone (414) 897-5714, email susan.eichelkraut@wisconsin.gov] for the WPDES Carriage and Interstitial Water from Dredging Operations General Permit (WI-0046558-06-0). Additional information is available online at https://dnr.wisconsin.gov/topic/Wastewater/GeneralPermits.html.

8. The Sugar River in Dane County is a Class 2 trout stream supporting a brown trout population with some natural reproduction and recruitment but supplementally stocked by Wisconsin DNR. The stream receives annual stocking of 2000 large fingerling trout. During a survey assessment in 2020 and 2021 it was observed that the habitat in the Sugar River was of variable quality and in areas with better habitat and higher amounts of cover for fish, there were more and larger trout. The report of this assessment recommended habitat improvement to increase natural recruitment of brown trout. The report also recommends protecting groundwater and riparian areas in sensitive areas of the watershed to promote brown trout natural recruitment. The report is available online at https://dnr.wisconsin.gov/sites/default/files/topic/Fishing/DaneSugarRiver20202021Watershed.pdf.
    a. The Stream Natural community for the Sugar River in the project area is cool cold mainstem and the following fish species were observed during the 2021 surveys: Brown trout, white sucker, mottled sculpin, creek chub and shorthead redhorse.

9. The proposed disturbance area has been field reviewed and surveyed for rare species habitat presence, suitability, and habitat types. The project area was documented as potentially containing suitable habitat for the white lady's slipper orchid and eastern prairie white fringed orchid identified by previous surveys in 2023. Earlier survey work was completed outside of the optimal identification periods of the orchids, so an additional field survey was performed on June 25, 2024, by Heartland Ecological Group to further assess species presence or absence. This field survey date falls within the late blooming/fruiting period of both orchids. Potential habitat areas previously identified were assessed using meander surveys. Neither of the orchids were observed within potential habitat areas.

10. The consultant (AECOM) documented that the project is expected to cause a floodplain impact (an increase to the *Base Flood Elevation*, or BFE). Since the increase is limited to property owned by the applicant, the applicant is not required to acquire flooding easements or complete other legal arrangements since any anticipated rise in the BFE will solely impact the applicant's property (or properties). The application submitted included a floodplain memo mentioning that the applicant intends to apply for a *Conditional Letter of Map Revision* (CLOMR). Obtaining a CLOMR is not required by FEMA until the cumulative impact of all projects in Zone A results in a rise greater than 1.0 foot. Based on communications with both Dane County and the City of Verona, there's an expectation that development pressure in this area will continue to increase with time, so obtaining a CLOMR is a proactive approach by the applicant.

11. Temporary and permanent erosion control measures will be implemented on this project in accordance with WDNR Technical Standards. Soil stockpiles will be stored outside of the wetland/floodplain area and will have silt fence or erosion logs placed along all downstream sides of stockpiles. Stockpiles in place for longer than 14 days will be either be temporarily seeded or a polymer soil stabilizer will be applied to the stockpiled soil. The stormwater best management practices (BMPs) will be installed outside of the wetlands. 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 (TSS) 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.

12. 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.

13. The Sugar River was channelized likely around the turn of the 20th century as the watershed's landcover was being converted from native habitats to agriculture. The combination of land cover conversion and channelization of the river has all but eliminated ecological functions related to hydrologic, hydraulic,

geomorphic, physio-chemical and biological processes. In addition, the Sugar River is a classified cold-water trout stream with special significance regionally.

a. For the proposed stream restoration portion of the project, at least 3,800 linear feet of existing channelized river channel will be converted to 5,600 linear feet of meandering channel based on a survey of stable reference reach of the Sugar River located south of US 18/151.
b. There were two springs identified as part of the Sugar River. The spring locations can be seen on the stream realignment plans and the proposed connection to the stream. The proposed stream re-meandering will intercept these springs which will allow them to be connected to the main channel.
c. The project goals for Alternative 3.2's stream restoration:
    i. Exceed current regulatory requirements of the roadway crossing project.
    ii. Provide ecological functional lift of the Sugar River related to hydraulics, geomorphology, physiochemistry and biology.
    iii. Effect positive impacts on social values of the valley related to ecosystem restoration: natural, healthy open spaces for foot and bike traffic along the MRST, enhanced kayaking/canoeing, wildlife viewing and fishing.
    iv. Increase the quality of the floodplain wetlands in the Sugar River Valley.
d. An overview of the Sugar River restoration values:
    i. Proposed 5,600 linear feet of restored re-meandered river channel (measured as centerline distance, which is 3.97 acres of surface area within the river valley) .
    ii. Proposed 11,200 linear feet of streambank restoration including fish and macroinvertebrate habitat features (in-channel wood and cover) such as toe-wood with sod mats and cedar tree revetments.
    iii. Proposed 1.27 acres of restored floodplain wetland types where abandoned ditch scars currently exist as open water.
    iv. Proposed 1.88 acres of restored floodplain wetlands where channelized portion of Sugar River currently exists.
    v. Proposed 14.12 acres of temporary wetland impacts in order to complete the restoration.

14. The goals of the proposed stream restoration include:
    a. Additional resource benefits by means of a voluntary stream restoration element,
    b. Provide ecological functional lift of the Sugar River related to hydraulics, geomorphology, physiochemistry and biology,
    c. Effect positive impacts on social values of the valley related to ecosystem restoration: natural, healthy open spaces for foot and bike traffic along the MRST, enhanced kayaking/canoeing, wildlife viewing and fishing, and
    d. Increase the quality and connection of the floodplain wetlands within the Sugar River Valley.

15. The Department has completed an investigation of the project site and has evaluated the project as described in the application and plans.

16. A public informational hearing was held on May 9, 2024, for an in-person opportunity to provide oral and/or written comments as part of the public comment period. The written comments provided during the hearing and during the comment period are part of the permit record as well as the audio recording of the informational hearing. The list below is not exhaustive but does include some of the topics generally mentioned during the public comment period regarding public concerns:
    a. The Sugar River valley is a valued resource of the community in terms of the river itself and surrounding wetlands. The Upper Sugar River reflects a cold-water success story due to the rebounded fishery and water quality.
    b. The original proposed LUNKER structures were urged by the community to be removed from the plans and replace with natural materials such as root wads. Root wads provide improved bank stability and erosion control, and the applicant made that adjustment based on public comments.

c. Community comments focused on maintaining connection between the stream to its floodplain. The final revised plans propose to restore the stream channel from the current straightened alignment to the natural meander alignment as seen in the early 1930s aerial imagery. The preferred (and proposed) bridge design is a design that meets local floodplain regulations as well.
d. The community requested the stream be restored to its original meanders and channels whenever possible to restore trout and aquatic habitat.
e. The comments also mentioned the higher quality wetland communities within the larger river valley wetland complex. The applicant's plans include maintaining the high-quality sedge meadow wetland community as intact (not to be disturbed) and will be part of a wetland enhancement plan to ensure this sedge meadow community continues to thrive.
f. The public comment period brought to light the groundwater seeps/springs on the western river valley bank where the bridge crossing meets the valley side. This information was shared with the applicant and the plans were revised to leave the seeps/springs intact and able to continue flowing with the flow continuing to reach the stream channel.

17. The Sugar River is a navigable water and classified trout stream (and no bulkhead exists at the project site).

18. The proposed project, if constructed in accordance with this permit will not adversely affect water quality, will not increase water pollution in surface waters and will not cause environmental pollution as defined in s. 283.01(6m), Wis. Stats.

19. The proposed project will result in temporary and permanent impacts to wetlands if constructed in accordance with this permit. See #IP-SC-2024-13-00583 for wetland-related application and permit documents.

20. The Department of Natural Resources has determined that the agency's review of the proposed project constitutes an integrated analysis action under s. NR 150.20(2), Wis. Adm. Code. The Department has considered the impacts on the human environment, alternatives to the proposed projects and has provided opportunities for public disclosure and comment. The Department has completed all procedural requirements of s. 1.11(2)(c), Wis. Stats., and NR 150, Wis. Adm. Code for this project.

21. The Department of Natural Resources and the applicant have completed all procedural requirements and the project as permitted will comply with all applicable requirements of Sections 30.123, 30.195(1), and 30.208, Wis. Stats., and Chapters NR 102, 103, and 320 of the Wis. Adm. Code.

    The applicant was responsible for fulfilling the procedural requirements for publication of notices under s. 30.208(5)(c)1m., Wis. Stats., and was responsible for publication of the notice of pending application under s.30.208(3)(a), Wis. Stats., or the notice of public informational hearing under s.30.208(3)(c), Wis. Stats., or both. S. 30.208(3)(e), Wis. Stats., provides that if no public hearing is held, the Department must issue its decision within 30 days of the 30-day public comment period, and if a public hearing is held, the Department must issue its decision within 20 days after the 10-day period for public comment after the public hearing. S. 30.208(5)(bm), Wis. Stats., requires the Department to consider the date on which the department publishes a notice on its web site as the date of notice.

22. The newly relocated stream channel is considered navigable and public as a result of this authorization and project. The newly relocated stream channel is considered navigable for local zoning purposes and local permits/approvals are required for work proposed within the shoreland zone of this waterway.

23. The bridge structure and stream relocation will not materially obstruct navigation because the project components have been designed and plan to be constructed to maintain historic and current recreational

uses of the creek (such as paddling uses, for example) and the Military Ridge State Trail (MRST). The stream relocation will maintain stream flow capacity while adding length by restoring the historic natural stream meanders and enhanced with in-channel aquatic habitat features.

24. The bridge structure and stream relocation will not be detrimental to the public interest because the project components have been designed and plan to be constructed to maintain historic and current recreational uses of the creek (such as paddling uses, for example) and the Military Ridge State Trail (MRST). The stream relocation will maintain stream flow capacity while adding length by restoring the historic natural stream meanders and enhanced with in-channel aquatic habitat features.

25. The bridge structure and stream relocation will not materially reduce the flood flow capacity of a stream because the new realigned meandering stream channel has been designed to accommodate the stream flow capacity.

26. The activity will not cause environmental pollution as defined in s. 299.01(4), Wis. Adm. Code.

27. No material injury will result to the riparian rights of any riparian owners of real property that abuts any water body that is affected by the activity.

CONCLUSIONS OF LAW

1. The Department has authority under the above indicated Statutes and Administrative Codes, to issue a permit for the construction and maintenance of this project.

2. The Department has complied with s. 1.11, Wis. Stats.

NOTICE OF APPEAL RIGHTS

If you believe that you have a right to challenge this decision, you should know that the Wisconsin statutes and administrative rules establish time periods within which requests to review Department decisions shall be filed. For judicial review of a decision pursuant to sections 227.52 and 227.53, Wis. Stats., you have 30 days after the decision is mailed, or otherwise served by the Department, to file your petition with the appropriate circuit court and serve the petition on the Department. Such a petition for judicial review shall name the Department of Natural Resources as the respondent.

To request a contested case hearing of any individual permit decision pursuant to section 30.209, Wis. Stats., you have 30 days after the decision is mailed, or otherwise served by the Department, to serve a petition for hearing on the Secretary of the Department of Natural Resources, P.O. Box 7921, Madison, WI, 53707-7921. The petition shall be in writing, shall be dated and signed by the petitioner, and shall include as an attachment a copy of the decision for which administrative review is sought. If you are not the applicant, you must simultaneously provide a copy of the petition to the applicant. If you wish to request a stay of the project, you must provide information, as outlined below, to show that a stay is necessary to prevent significant adverse impacts or irreversible harm to the environment. If you are not the permit applicant, you must provide a copy of the petition to the permit applicant at the same time that you serve the petition on the Department.

The filing of a request for a contested case hearing is not a prerequisite for judicial review and does not extend the 30-day period for filing a petition for judicial review.

A request for contested case hearing must meet the requirements of section 30.209, Wis. Stats., and sections NR 2.03, 2.05, and 310.18, Wis. Admin. Code, and if the petitioner is not the applicant the petition must include the following information:

1. A description of the objection that is sufficiently specific to allow the department to determine which provisions of this section may be violated if the proposed permit or contract is allowed to proceed.
2. A description of the facts supporting the petition that is sufficiently specific to determine how the petitioner believes the project, as proposed, may result in a violation of Chapter 30, Wis. Stats;.
3. A commitment by the petitioner to appear at the administrative hearing and present information supporting the petitioner's objection.

If the petition contains a request for a stay of the project, the petition must also include information showing that a stay is necessary to prevent significant adverse impacts or irreversible harm to the environment.

Dated at the Northeast Region Headquarters, Wisconsin on December 3, 2024.

STATE OF WISCONSIN DEPARTMENT OF NATURAL RESOURCES
For the Secretary

By:
Crystal Von Holdt
Crystal Von Holdt
Waterway Program Policy Coordinator

State of Wisconsin
DEPARTMENT OF NATURAL RESOURCES
2984 Shawano Ave.
Green Bay, WI, 54313

Tony Evers, Governor

Telephone 608-266-2621
Toll Free 1-888-936-7463
TTY Access via relay - 711

WISCONSIN
DEPT. OF NATURAL RESOURCES

December 3, 2024 IP-SC-2024-13-00583

Epic Systems Corporation
Attn: Jim Schumacher
1979 Milky Way
Verona, WI 53593
[sent electronically]

RE: State Wetland Individual Permit for the proposed wetland impacts in the Town of Verona, Dane County

Dear Mr. Schumacher:

The Department of Natural Resources has completed its review of your application for a permit authorizing temporary and permanent wetland impacts for the "West Road" bridge crossing project. This project is to address traffic growth, safety, and emerging and forecasted operational deficiencies on both US 18/151, between the W. Verona Avenue/Epic Lane and the County Trunk Highway (CTH) G/Dairy Ridge Road interchanges, and along CTH PD in the City and Town of Verona. Verona is one of Wisconsin's fastest growing communities (per US Census data, the population grew by over 30% between 2010 and 2020) and so the volume of traffic has reflected the growth of this community. The project consists of a proposed (currently) private roadway and bridge crossing over the Sugar River and the state trail connecting US 18/151 to Epic Campuses from the southwest along with wetland impacts for installing a utility crossing. The project plans revised in July 2024 propose 3.30 ac of temporary and 7.44 permanent wetland impacts. Approximately one mile of stream relocation will be completed to restore the Sugar River's natural meanders as well as restoration of 6.19 ac of farmed wet meadow, establishing an area 3.53 ac in size as an upland buffer along the edge of existing wetlands, and maintenance/management to maintain the intact 11.26 ac sedge meadow wetland community as a high-quality sedge meadow wetland type.

The project will impact wetlands along Sugar River, located in the SE 1/4, NE 1/4, Section 18, Township 06, Range 08E in the Town of Verona, Dane County. You will be pleased to know your application is approved.

I am attaching a copy of your permit, which lists important conditions that must be followed to protect water quality and habitat. A copy of the permit must be posted for reference at the project site. Please read your permit conditions carefully so that you are fully aware of what is expected of you. Take note of the requirement to submit photographs of the completed project within 7 days after you've finished construction. This helps both of us to document the completion of the project and compliance with the permit conditions.

Your next step will be to notify me of the date on which you plan to start construction and again after your project is complete. If you have any questions about your permit, please call me at (920) 410-3181 or email me at Crystal.VonHoldt@wisconsin.gov.

Sincerely,

Crystal Von Holdt
Waterway Program Policy Coordinator

Email CC: Caree Kovacevich, USACE Project Manager
Roger Lane, Dane County Zoning Administrator
Holly Licht, City of Verona Clerk
Sarah Gaskell, Town Verona Planner/Administrator
Jake Donar, DNR Conservation Warden
Kyle Neeve, Tyler Tkachuk, and Zach Larson, AECOM
Shelly Allness, DNR Field Integration Leader – South Central Region
Brian Cunningham, DNR Regional Waterway/Wetland Supervisor
Kyle Olivencia, DNR Fisheries Biologist
Michael Sorge, DNR Water Resources Supervisor
Camille Bruhn, DNR Water Resources Specialist
Laura Spears, DNR Stormwater Specialist
Eric Heggelund, DNR Environmental Analysis & Review Specialist
Will Disser, DNR Water Management Engineer
Pam Rood, DNR Facilities and Lands Financial Assistance Specialist
Kaylin Helm, DNR Real Estate Program
Kevin Swenson, DNR State Property Supervisor
Andy Paulios, DNR Wildlife Biologist

STATE OF WISCONSIN **WETLAND INDIVIDUAL PERMIT**
DEPARTMENT OF NATURAL RESOURCES **IP-SC-2024-13-00583**

Application of Jim Schumacher on behalf of Epic Systems Corporation (Epic), is hereby granted under Section 281.36, Wis. Stats., and 33 U.S.C.S. Sect. 1341 (CWA Sect. 401), to impact wetlands located at SE 1/4, NE 1/4, Section 18, Township 06N, Range 08E, Town of Verona, Dane County, subject to the following conditions:

PERMIT

1. You must notify Crystal vonHoldt at phone (920) 410-3181 or email Crystal.VonHoldt@wisconsin.gov before starting construction and again not more than 5 days after the project is complete.

2. You must complete the project as described **on or before 12/03/2027**. If you will not complete the project by this date, you must submit a written request for an extension prior to expiration of the initial time limit specified in the permit. Your request must identify the requested extension date. The Department shall extend the time limit for an individual permit or contract for no longer than an additional 5 years if you request the extension before the initial time limit expires. You may not begin or continue construction after the original permit expiration date unless the Department extends the permit in writing or grants a new permit.

3. This permit does not authorize any work other than what you specifically describe in your application and final revised plans dated 9/18/2024, and as modified by the conditions of this permit. If you wish to alter the project or permit conditions, you must first obtain written approval of the Department.

4. You are responsible for obtaining any permit or approval that may be required for your project by local zoning ordinances and by the U.S. Army Corps of Engineers before starting your project.

5. Upon reasonable notice, you shall allow access to your project site during reasonable hours to any Department employee who is investigating the project's construction, operation, maintenance, or permit compliance.

6. The Department may modify or revoke this permit for good cause, including if the project is not completed according to the terms of the permit or if the Department determines the activity is detrimental to the public interest.

7. You must **post a copy of this permit at a conspicuous location on the project site**, visible from the waterway, for at least five days prior to construction, and remaining at least five days after construction. You must also have a copy of the permit and approved plan available at the project site at all times until the project is complete.

8. Your acceptance of this permit and efforts to begin work on this project signify that **you have read, understood, and agreed** to follow all conditions of this permit.

9. You must **submit a series of photographs** to the Department, within one week of completing work on the site. The photographs must be taken from different vantage points and depict all work authorized by this permit.

10. You, your agent, and any involved contractors or consultants may be considered a party to the violation pursuant to Section 30.292, Wis. Stats., for any violations of Chapter 30, Wis. Stats., or this permit.

11. Construction shall be accomplished in such a manner as to minimize erosion and siltation into surface waters and wetlands. All erosion control measures shall meet or exceed the Department approved technical standards listed under subchapter 3 of ch. NR 151, Wis. Adm. Code. The technical standards are found at https://dnr.wi.gov/, keyword "storm water technical standard".

12. All equipment used for the project including but not limited to tracked vehicles, barges, boats, hoses, sheet pile and pumps shall be de-contaminated for invasive and exotic viruses and species prior to use and after use. The following steps must be taken every time you move your equipment to avoid transporting invasive and exotic viruses and species. To the extent practicable, equipment and gear used on infested waters shall not be used on other non-infested waters.
    a. **Inspect and remove** aquatic plants, animals, and mud from your equipment. 2. **Drain all water** from your equipment that comes in contact with infested waters, including but not limited to tracked vehicles, barges, boats, hoses, sheet pile, and pumps.
    b. **Dispose** of aquatic plants, animals in the trash. Never release or transfer aquatic plants, animals, or water from one waterbody to another.
    c. **Wash your equipment** with hot (140 degrees F) and/or high-pressure water, - OR - Allow your equipment to **dry thoroughly for 5 days**.

13. Final site stabilization requires the re-establishment of vegetation with non-aggressive, native species and should not contain invasive species (such as Reed Canary Grass, *Phalaris arundinacea*).

14. The excavation of the northern and southern crossing utility trenches must be done in layers and placed back in the trench in the same orientation as it was removed.

15. The wetland at the northern and southern crossing utility trenches must be restored to its original topographic elevations. No mounding or excess fill is allowed unless specified in this permit.

16. You are not allowed to temporarily or permanently stockpile excavated or fill material in the wetland outside of the authorized wetland impact areas identified in the final revised plans. Disposal or placement of excess material cannot be located in wetland, floodplain, in areas of concentrated flow, or below the *ordinary high-water mark* (OHWM) of any navigable waterway unless included in this permit authorization and plans.

17. For areas of temporary wetland impacts, you must survey the vegetation types on an annual basis for three years within the wetland boundary for any growth of non-native exotic species. If exotic species are identified, you must submit a remediation plan to eradicate the exotic species to the Department for written approval and must implement the plan within 90 days of Department approval.

18. During construction, the use of highly visible construction fencing (or similar) is required to completely surround the existing archaeological site (located between station 15+00 and 20+00) and used to create a visual separation (barrier) between wetlands authorized for disturbance and wetlands **not** authorized for disturbance to ensure these areas remain intact during all phases of construction.

19. For elements of the project that require the use of tracking mats, these mats are to be completely removed when construction is finished.

20. This project site has potential to contain suitable habitat for the Big Brown & Tricolored Bats. Tree removal occurring as part of this project is covered for *take* by the *Cave Bat Broad Incidental Take Permit* and there are no required actions for this species. However, it is recommended that special consideration be given to keeping snags or dying trees intact within the project site (if present) particularly between June 1st and August 15th annually during construction.

21. To minimize soil disturbance and vegetation impacts during saturated ground conditions in Spring, construction is to take place between Fall through Winter annually for optimal construction activities.
    a. Low-pressure-tired or track driven machinery shall be used along with bog mats (timber mats) during frozen ground conditions to limit vegetation and soil impacts.

22. All disturbed areas outside of the newly excavated channel realignment shall be de-compacted, seeded with native, local genotype seed specific to the wetland types disturbed (specified within the planting plan) and treated with certified clean straw to be disked into the topsoil.

23. Temporary and permanent soil stockpiles will have silt fence or similar erosion control practices installed along all downstream sides of the stockpiles. Stockpiles in place for more than 14 days are to be either temporarily seeded or a polymer soil stabilizer applied to the stockpiled soil.

24. As proposed for streambank stabilization of the new stream channel alignment, the sod mats will be cut from the wetland surface during construction and beneficially used as bank cover to establish natural vegetation for bank protection. All contractors working on this project are to closely monitor sod mats and ensure the roots of the sod mat do not get dried out and wind burned which would ultimately kill the vegetation (sod mat).

25. A full complete copy of plans and the permit are to be provided to each contractor working on the project.

26. Erosion control measures must be in place at the end of each working day and must be inspected and any necessary repairs or maintenance performed after every rainfall event exceeding 1/2 inch and at least once per week. Appropriate and proper erosion control practices are to be season-specific and designed for successful establishment of vegetation even when seeding is conducted during non-growing season timeframes.
    a. After the site is 80% stabilized or prior to or at the direction of the Department, all temporary erosion control measures must be removed and disposed of properly.

FINDINGS OF FACT

1. Jim Schumacher on behalf of Epic Systems Corporation (Epic), 1979 Milky Way, Verona, WI 53593, filed an application with this Department on 02/29/2024, under section 281.36, Wis. Stats., to impact wetlands located in the SE 1/4, NE 1/4, Section 18, Township 06N, Range 08E, Town of Verona, Dane County.

2. The purpose of this project is to address traffic growth, safety, and emerging and forecasted operational deficiencies on both US 18/151, between the W. Verona Avenue/Epic Lane and the County Trunk Highway (CTH) G/Dairy Ridge Road interchanges, and along CTH PD in the City and Town of Verona. Verona is one of Wisconsin's fastest growing communities (per US Census data, the population grew by over 30% between 2010 and 2020) and so the volume of traffic has reflected the growth of this community. The project consists of a proposed (currently) private roadway and bridge crossing over the Sugar River and the state trail connecting US 18/151 to Epic Campuses from the southwest along with wetland impacts for installing a utility crossing.
    a. The bridge crossing will result in 3.85 ac of temporary and 9.78 permanent wetland impacts. The bridge crossing has a width of 87.25ft wide with a length of 903.08ft from east to west bank of the river valley. The bridge provides 2 travel lanes in each direction with each lane being 11ft wide. The bridge crossing includes a pedestrian path along the south side of the bridge. The bridge includes 9 spans spaced 95ft apart. Each pier supporting the spans for the bridge across the valley floor is 4.25ft wide and a buried footing. The spans are designed intentionally to create a clear span over Sugar Creek and over the Military Ridge State Trail (MRST).

b. Within the footprint of the bridge crossing is a planned utility crossing that will allow utilities to extend east/west across the river valley. There are areas where this northern utility crossing will overlap with the impacts of the bridge piers (which result in a permanent wetland impact at each pier location). In the spanned bridge sections, the installation of the northern utility crossing will create a temporary impact since after the utility is installed, the ground will be restored to wetland.
c. Approximately one mile of stream relocation and restoration is proposed to be done as part of this project to bring the Sugar River back to the natural meandering. The stream realignment will result in 14.36 acres of temporary wetland disturbances to excavate the new stream channel meander and then use the excavated wetland material to backfill the current straightened stream channel. This will restore wetlands in the straightened stream channel. Access with use of timber mats is considered a temporary impact to wetlands and is included in this calculation of temporary impacts.
d. The existing 11.26 acres of high-quality sedge meadow wetland community on the southwest side of the MRST will remain intact with efforts to ensure this community continues to thrive as a high-quality wetland type. The sedge meadow is immediately adjacent to the Sugar River Wildlife Area.
e. An additional 6.19 acres of farmed wet meadow on the northeast side of the MRST is to be restored (by means of no mow and wetland seed mix) and coupled with an adjacent 3.53 acres of non-wetland restoration to establish an upland buffer along the edge of existing wetlands.

3. There are four criteria that the applicant describes as necessary elements to meet the project purpose and need:
    a. Meet operational and safety requirements to handle near-term and long-term forecasted traffic (e.g., secondary access points).
    b. Minimizes net environmental impacts (wetland, floodplain, Military Ridge State Trail (MRST)) while providing better Sugar River access to the public (bike, pedestrians, kayak, trout fishing, etc.).
    c. Meets near and long-term growth plans in the region. Based on Epic's growth history, one important criterion is that a solution be publicly owned and be located on the outside boundary of campus. Northern Lights Road was moved two times between 2005 and 2017, with additional expansion work occurring every couple of years, which causes disruption to City residents and Epic employees and is costly.
    d. Minimize relocation of existing infrastructure (buildings, underground utilities, geothermal, solar fields, etc.).

4. Seasonal peaks in watershed flow and groundwater limit construction timing on this project. Higher flows in late winter and spring, as well as seasonally high ground water, render work in the floodplain infeasible. Construction is proposed during the recommended fall-winter period for optimal construction activities. In all cases, low-pressure-tired or track driven machinery is planned to be used along with bog (timber) mats once the ground is frozen to limit vegetation and soil impacts.

5. The stream restoration will return the existing straightened stream channel to the 1930s natural meander alignment. This will recreate approximately 1 mile of stream channel designed with a pool-and-riffle system along with in-channel habitat features (root wads) and natural bank stabilization using excavated and salvaged wetland sod mats. Historic ditch scars will be backfilled with excavated wetland material and eleven (11) ditch plugs will be installed to divert the stream flow into the new channel meanders. Some areas of straightened ditch channel may remain as "overflow" areas or backwater areas to create a diverse riparian community. The new meander streambanks will be stabilized using excavated wetland sod mats and toe-wood designs to incorporate natural on-site materials in the restored stream channel.

6. While the project site overlaps with and/or occurs within 1 mile of the Rusty Patched Bumble Bee (RPBB) High Potential Zone and contains suitable habitat, marshes/wetlands, agricultural landscapes, and woodlands, for the bee, there is no federal nexus for federal authority for the taking prohibition per the federal Endangered Species Act (ESA).

7. The applicant contracted UW-Milwaukee Cultural Resource Management (CRM) to complete a Phase 1 Archaeological Survey for the proposed West Road project in July 2024. The CRM report documents three archaeological sites encountered: 47DA0852, 47DA0853, and newly identified site 47DA1609 Sugar River Wetland Scatter. Sites 47DA0852 and 47DA1609 Sugar River Wetland Scatter do not meet the criteria listing on the National Register of Historic Places (NRHP) and so no additional investigations were conducted for those two sites. Site 47DA0853 showed evidence of a Late Archaic component and met the criteria for listing on the NRHP. Avoidance of Site 47DA0853 was recommended and is reflected the plans so no further investigation is necessary. The final plans designed and authorized by this permit includes avoidance of all three archaeological sites during construction and land-disturbing activities.

8. The state's Wastewater Program conveyed coverage for the applicant's project under the Wisconsin Pollutant Discharge Elimination System (WPDES) Dewatering General Permit (WI-0049344-05-0) on February 28, 2024. If there are additional planned wastewater discharges to waters of the state from the applicant's transportation project (e.g., additional dewatering, discharges from dredged materials), additional coverage under a WPDES general permit must be obtained prior to the discharge. For questions about obtaining coverage under a WPDES general permit, contact the Reece Matheson [phone (414) 345-0852, email reece.matheson@wisconsin.gov] for the WPDES Dewatering General Permit (WI-0049344-05-0) or Susan Eichelkraut [phone (414) 897-5714, email susan.eichelkraut@wisconsin.gov] for the WPDES Carriage and Interstitial Water from Dredging Operations General Permit (WI-0046558-06-0). Additional information is available online at https://dnr.wisconsin.gov/topic/Wastewater/GeneralPermits.html.

9. Since the proposed project includes construction adjacent and/or over the Military Ridge State Trail (MRST), the applicant is required to apply for and obtain state Real Estate permits with the necessary construction documentations. For questions about obtaining state Real Estate permits, please continue communications with Kaylin Helm with the Department's Real Estate Program. Kaylin can be reached at (608) 444-8059 or by email at Kaylin.Helm@wisconsin.gov.

10. The proposed disturbance area has been field reviewed and surveyed for rare species habitat presence, suitability, and habitat types. The project area was documented as potentially containing suitable habitat for the white lady's slipper orchid and eastern prairie white fringed orchid identified by previous surveys in 2023. Earlier survey work was completed outside of the optimal identification periods of the orchids, so an additional field survey was performed on June 25, 2024, by Heartland Ecological Group to further assess species presence or absence. This field survey date falls within the late blooming/fruiting period of both orchids. Potential habitat areas previously identified were assessed using meander surveys. Neither of the orchids were observed within potential habitat areas.

11. The consultant (AECOM) documented that the project is expected to cause a floodplain impact (an increase to the *Base Flood Elevation*, or BFE). Since the increase is limited to property owned by the applicant, the applicant is not required to acquire flooding easements or complete other legal arrangements since any anticipated rise in the BFE will solely impact the applicant's property (or properties). The application submitted included a floodplain memo mentioning that the applicant intends to apply for a *Conditional Letter of Map Revision* (CLOMR). Obtaining a CLOMR is not required by FEMA until the cumulative impact of all projects in Zone A results in a rise greater than 1.0 foot. Based on communications with both Dane County and the City of Verona, there's an expectation that development pressure in this area will continue to increase with time, so obtaining a CLOMR is a proactive approach by the applicant.

12. Temporary and permanent erosion control measures will be implemented on this project in accordance with WDNR Technical Standards. Soil stockpiles will be stored outside of the wetland/floodplain area and

will have silt fence or erosion logs placed along all downstream sides of stockpiles. Stockpiles in place for longer than 14 days will be either be temporarily seeded or a polymer soil stabilizer will be applied to the stockpiled soil. The stormwater best management practices (BMPs) will be installed outside of the wetlands. 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 (TSS) 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.

13. 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.

14. The Sugar River was channelized likely around the turn of the 20th century as the watershed's landcover was being converted from native habitats to agriculture. The combination of land cover conversion and channelization of the river has all but eliminated ecological functions related to hydrologic, hydraulic, geomorphic, physio-chemical and biological processes. In addition, the Sugar River is a classified cold-water trout stream with special significance regionally.
    a. For the proposed stream restoration portion of the project, at least 3,800 linear feet of existing channelized river channel will be converted to 5,600 linear feet of meandering channel based on a survey of stable reference reach of the Sugar River located south of US 18/151.
    b. There were two springs identified as part of the Sugar River. The spring locations can be seen on the stream realignment plans and the proposed connection to the stream. The proposed stream re-meandering will intercept these springs which will allow them to be connected to the main channel.
    c. The project goals for Alternative 3.2's stream restoration:
        i. Exceed current regulatory requirements of the roadway crossing project.
        ii. Provide ecological functional lift of the Sugar River related to hydraulics, geomorphology, physiochemistry and biology.
        iii. Effect positive impacts on social values of the valley related to ecosystem restoration: natural, healthy open spaces for foot and bike traffic along the MRST, enhanced kayaking/canoeing, wildlife viewing and fishing.
        iv. Increase the quality of the floodplain wetlands in the Sugar River Valley.
    d. An overview of the Sugar River restoration values:
        i. Proposed 5,600 linear feet of restored re-meandered river channel (measured as centerline distance, which is 3.97 acres of surface area within the river valley) .
        ii. Proposed 11,200 linear feet of streambank restoration including fish and macroinvertebrate habitat features (in-channel wood and cover) such as toe-wood with sod mats and cedar tree revetments.
        iii. Proposed 1.27 acres of restored floodplain wetland types where abandoned ditch scars currently exist as channelized open water.
        iv. Proposed 1.88 acres of restored floodplain wetlands where channelized portion of Sugar River currently exists.
        v. Proposed 14.12 acres of temporary wetland impacts in order to complete the restoration.

15. The goals of the proposed stream restoration include:
    a. Additional resource benefits by means of a voluntary stream restoration element,
    b. Provide ecological functional lift of the Sugar River related to hydraulics, geomorphology, physiochemistry and biology,
    c. Effect positive impacts on social values of the valley related to ecosystem restoration: natural, healthy open spaces for foot and bike traffic along the MRST, enhanced kayaking/canoeing, wildlife viewing and fishing, and
    d. Increase the quality and connection of the floodplain wetlands within the Sugar River Valley.

16. A public informational hearing was held on May 9, 2024, for an in-person opportunity to provide oral and/or written comments as part of the public comment period. The written comments provided during

the hearing and during the comment period are part of the permit record as well as the audio recording of the informational hearing. The list below is not exhaustive but does include some of the topics generally mentioned during the public comment period regarding public concerns:

a. The Sugar River valley is a valued resource of the community in terms of the river itself and surrounding wetlands. The Upper Sugar River reflects a cold-water success story due to the rebounded fishery and water quality.
b. The original proposed LUNKER structures were urged by the community to be removed from the plans and replace with natural materials such as root wads. Root wads provide improved bank stability and erosion control, and the applicant made that adjustment based on public comments.
c. Community comments focused on maintaining connection between the stream to its floodplain. The final revised plans propose to restore the stream channel from the current straightened alignment to the natural meander alignment as seen in the early 1930s aerial imagery. The preferred (and proposed) bridge design is a design that meets local floodplain regulations as well.
d. The community requested the stream be restored to its original meanders and channels whenever possible to restore trout and aquatic habitat.
e. The comments also mentioned the higher quality wetland communities within the larger river valley wetland complex. The applicant's plans include maintaining the high-quality sedge meadow wetland community as intact (not to be disturbed) and will be part of a wetland enhancement plan to ensure this sedge meadow community continues to thrive.
f. The public comment period brought to light the groundwater seeps/springs on the western river valley bank where the bridge crossing meets the valley side. This information was shared with the applicant and the plans were revised to leave the seeps/springs intact and able to continue flowing with the flow continuing to reach the stream channel.

17. The proposed project will result in temporary and permanent impacts to wetlands if constructed in accordance with this permit. See #IP-SC-2024-13-00581 and #IP-SC-2024-13-00582 for waterway-related application and permit documents for the bridge crossing and stream realignment.

18. The discharge will affect a total of 7.44 acres of wetland for permanent impacts and 3.30 acres of wetland for temporary impacts. The proposed impacts are for the construction of the bridge (roadway) crossing of the Sugar River as well as the temporary impacts associated with the southern utility crossing and the stream restoration (realignment) elements as part of this project.

19. The discharge(s) from the proposed activity will comply with water quality requirements as authorized by this document.

20. The applicant proposed to compensate for wetland losses through mitigation. The Department evaluated the wetland mitigation proposal and determined that on-site mitigation was not feasible, and the purchase of the below mitigation credits could fulfill the compensation obligation. Mitigation for the project was accomplished through the purchase of:
    a. 3.10 shrub carr credits from the Willow Drive Wetland Mitigation Bank
    b. 1.42 sedge meadow credits and 4.12 wet to wet mesic prairie credits from the Johnson Conservancy Wetland Mitigation Bank
    c. 1.64 sedge meadow credits, 0.43 wet to wet mesic prairie credits, and 0.43 shallow marsh credits from the Sugar River Wetland Mitigation Bank.

21. The mitigation plan proposed the total purchase of 11.14 acres of credit to compensate for the original impact of 9.78 acres of permanent wetland loss based for the Alternative 3.2 design (which was revised in July 2024 to reflect a total of 7.44 acres of permanent wetland loss). The applicant voluntarily completed the wetland mitigation compensatory purchase based on the original Alternative 3.2 wetland impact calculations even after the July 2024 revision that reduced the wetland impacts. The credits were

purchased on 10/15/2024 and Affidavits of Bank Credit Purchases were submitted to the Department fulfilling the compensation obligation.

22. No practicable alternative exists which would avoid adverse impacts to wetlands, and the project will result in the least environmentally damaging practicable alternative taking into consideration practicable alternatives that avoid wetland impacts.
    a. Alternative 0 (no build) and Alternative 1 (West Verona Avenue/USH 18/151 Interchange improvements) are projects that would completely avoid wetland impacts. However, these alternatives were eliminated since these alternatives do not meet the project need and purpose (identified in Finding of Fact #3). In these alternative designs, the traffic capacity and safety improvement elements for the highway are not met.
    b. Alternative 2 (bridge crossing in southern-most portion of the river valley) was eliminated due to the layout not meeting the anticipated traffic capacity and safety improvements. Additionally, wetland impacts (10.71 acres of permanent impacts + 2.18 acres temporary impacts) were high with some impacts being located within high quality native wetland community types (such as shrub carr, sedge meadows, and shallow marsh).
        i. Permanent impacts to ruderal (degraded) wetland types = 10.64 ac
        ii. Permanent impacts to native wetland types = 0.07
        iii. Temporary impacts to ruderal (degraded) wetland types = 2.16 ac
        iv. Temporary impacts to native wetland types = 0.02 ac
    c. Alternative 3.1 (bridge crossing in northern-most portion of the river valley) was eliminated due to the wetland impacts (10.32 acres of permanent impacts + 2.00 acres temporary impacts) being located within high quality native wetland community types (such as shrub carr, sedge meadows, and shallow marsh).
        i. Permanent impacts to ruderal (degraded) wetland types = 6.30 ac
        ii. Permanent impacts to native wetland types = 4.02 ac
        iii. Temporary impacts to ruderal (degraded) wetland types = 0.81 ac
        iv. Temporary impacts to native wetland types = 1.19 ac
    d. **Alternative 3.2** – **Proposed Layout** updated in July 2024 (bridge alignment south of the northern-most alignment location to focus wetland impacts within ruderal wetland community types) is the proposed (preferred) layout pursued by the applicant. The overall wetland impact is 7.44 acres of permanent impacts with 2.22 acres of temporary impacts. This layout has the smallest wetland impact overall. The applicant also proposed several resource restoration and enhancement projects to reduce the overall impacts and find a better net balance between impacts and resource benefits. With completing the required compensatory mitigation along with stream restoration, wetland enhancement, and upland buffer establishment elements, this alternative was pursued as the option meeting the avoid/minimize criteria.
        i. Permanent impacts to ruderal (degraded) wetland types = 6.25 ac
        ii. Permanent impacts to native wetland types = 1.19 ac
        iii. Temporary impacts to ruderal (degraded) wetland types = 2.00 ac
        iv. Temporary impacts to native wetland types = 0.22 ac
    e. Alternative 3.3 (bridge crossing in northern-most portion of the river valley realigned to old historic farm access route) was eliminated due to the wetland impacts (9.93 acres of permanent impacts + 2.59 acres temporary impacts) being located within high quality native wetland community types (such as shrub carr, sedge meadows, and shallow marsh).
        i. Permanent impacts to ruderal (degraded) wetland types = 8.13 ac
        ii. Permanent impacts to native wetland types = 1.80 ac
        iii. Temporary impacts to ruderal (degraded) wetland types = 2.13 ac
        iv. Temporary impacts to native wetland types = 0.46 ac

f. Alternative 4 (using existing White Crossing Road) and Alternative 5 (additional roadway along north side of USH 18/151) would both result in wetland impacts. These alternatives are not expected to meet the traffic operations and safety issues so were eliminated.

23. All practicable measures to minimize adverse impacts to the functional values of the wetland have been taken. The proposed layout pursued by the applicant is Alternative 3.2. This alternative was further updated in July 2024 with a bridge design modification that further reduced the wetland impacts from the original Alternative 3.2 impact calculations. The overall wetland impact is 7.44 acres of permanent impacts with 2.22 acres of temporary impacts. This layout has the smallest wetland impact overall. The applicant also proposed several resource restoration and enhancement projects to reduce the overall impacts and find a better net balance between impacts and resource benefits. With completing the required compensatory mitigation along with stream restoration, wetland enhancement, and upland buffer establishment elements, this alternative was pursued as the option meeting the avoid/minimize criteria.

24. The proposed project will not result in significant adverse impacts to wetland functional values, significant impacts to water quality, or other significant adverse environmental consequences. The proposed project bridge crossing alignment focuses impacts within ruderal (degraded) wetland community types within the larger wetland complex. The bridge crossing is not designed as a complete solid filled footprint on the wetland surface. Rather, the bridge is designed to be elevated and supported with pier-spans to minimize the permanent impact (filled footprint) on the wetland ground. The updated bridge design (as of July 2024) includes a bridge crossing that is 903.08ft in length (from end-to-end approaches). The bridge consists of 9 spans (girders) with 95ft spacing between the piers. The 9 spans cover 855ft of the bridge total length and are supported by 8 piers (with buried footings). Each pier has a 4.25ft wide footprint on the wetland surface (at grade) with a wider footing buried below grade. The piers and spans are designed to provide a clear span section over the Sugar River and over the MRST. The bridge design was adjusted (in July 2024) to account for the seeps/springs on the west river valley bank so that the springs' flow will be maintained and continue to flow into the river channel without obstruction. Within the bridge footprint crossing the river valley, the northern utility crossing will be trenched in as a buried utility. This is considered part of the permanent impact where the utility aligns with the bridge piers and footings impact. The areas of the northern utility crossing that are outside of the pier and footing locations will be a temporary impact and wetlands will be restored. The southern utility crossing will cross the entire river valley (wetlands and the new meandered stream channel). The wetland impacts for this crossing are temporary and wetlands will be restored along the southern utility crossing length with the exception of the new stream channel constructed (which will be maintained as a new meandered stream channel). The southern utility crossing alignment is located partially within the existing farmed wetland field (degraded wetland community type) on the east end of the utility crossing and the west end of the crossing is aligned within a ruderal (degraded) wet meadow wetland community type. Alignments for all proposed project elements are located within ruderal wetland types where practicable and the permanent impact footprints have been reduced to the extent practicable while meeting the project need and purpose.

25. The project's proposed permanent wetland impacts are due to the piers and footings of the bridge spans across the river valley and east side road alignment intersections. The areas at each of the 8 pier locations as well as both east and west abutments are the localized areas of permanent wetland impact. Each pier is 4.25ft wide and extends 87.25ft long (across the 4 lanes – 2 travel lanes in each direction). There is a wider footing buried below ground surface at each of the pier locations. The piers (and subsequent span sections) are intentionally designed to clearly span over the Sugar River and MRST with no structural support elements within the navigable river channel or on the MRST. Where the piers and footings are located in the wetland, the functional values are to be eliminated. Due to the nature of permanent impacts on functional values, the design of the project alignment has focused the majority of

the impacts within areas of existing low-quality wetland plant communities to avoid the higher quality and intact native areas of wetland communities.

26. The applicant owns land on both sides of the navigable waterway and river valley. The applicant has provided information regarding the existing landowner's business plan and continued growth and expansion, the traffic and safety impacts to surface roads and state highways, and considerations to disturbances and safety implications within the surrounding community. The applicant's vision was cushioned with the goal of meeting or exceeding environmental permitting requirements and voluntarily offering a variety of elements in an effort to offset the permanent impacts of the bridge crossing.

27. The project need and purpose was reviewed through the lens of various alternative alignments, locations, configurations, etc. The bridge crossing of the river and river valley has minimized filling and impacts not only to wetlands but to the floodplain, waterway, springs, and recreational opportunities. Secondary impacts include short-term disturbances during active construction. The planned alignment has maximized impacts in areas of ruderal wetland but there are still some impacts planned within smaller areas of native wetland community types. Locations of temporary wetland impacts will be restored to wetland with seeding, plantings, decompaction, and other practices to ensure wetlands and their functional values recover in areas of temporary disturbance.

28. The applicant proposed and committed to several elements in order to better establish a net positive impact. The following additional wetland enhancements as part of the goal for "no net loss" of resource functional value and quality are included in the applicant's project proposal:
    a. Sedge Meadow Maintenance Plan to monitor and maintain the highly native and intact sedge meadow wetland community. This wetland community consists of 11.26 acres of sedge meadow to remain intact (this high-quality wetland type is avoided by all elements of the project design and construction) and will be maintained and improved as a sedge meadow plant community.
    b. Restoration of a currently farmed wetland on the northeast side of the MRST between the trail and the roadway. This farmed wetland field is located just north of the sedge meadow community and across the MRST. This area has been committed to be restored to wetland and additionally expand the restoration along the south side of the roadway to create an upland buffer. The restored wetland field covers 6.19 acres, and the upland buffer will establish 3.53 acres to a protective buffer along this wetland edge.
    c. The applicant proposed plans to complete a large-scale stream restoration project. This proposal will restore the classified trout stream (Sugar River) into the natural stream meanders as seen on the historic aerial imagery from the 1930s. The trout stream has been ditched, channelized, and straightened along with several other ditches established in this area of the wetland as historical attempts to improve drainage. By realigning the stream into the natural meanders, the project design also includes in-stream aquatic habitat features and natural designs for bank stabilization. The abandoned (old) stream channel will be backfilled in some areas and other areas will be restored to diverse wetland/aquatic habitat areas able to receive high water levels and provide restored functional values to this river valley ecological community.

29. The Department has completed an investigation of the project site and has evaluated the project as described in the application and plans.

30. The Department of Natural Resources has determined that the agency's review of the proposed project constitutes an equivalent analysis action under s. NR 150.20(2), Wis. Adm. Code. The Department has considered the impacts on the human environment, alternatives to the proposed projects and has provided opportunities for public disclosure and comment. The Department has completed all procedural requirements of s. 1.11(2)(c), Wis. Stats., and NR 150, Wis. Adm. Code for this project.

31. The Department and the applicant have completed all procedural requirements and the project as permitted will comply with all applicable requirements of Sections 281.36, Wis. Stats. and NR 103, Wis. Adm. Code.

    The applicant was responsible for fulfilling the procedural requirements for publication of notices under s. 281.36(3p)(d)1m., Wis. Stats, and was responsible for publication of the notice of pending application under s. 281.36(3p)(d)1m., Wis. Stats. or the notice of public informational hearing under s. 281.36(3p)(d)1m., Wis. Stats., or both. Section 281.36(3p)(d)1m., Wis. Stats., provides that if no public hearing is held, the Department must issue its decision within 30 days of the 30-day public comment period, and if a public hearing is held, the Department must issue its decision within 20 days after the 10-day period for public comment after the public hearing. Section 281.36(3p)(d)1m., Wis. Stats, requires the Department to consider the date on which the department publishes a notice on its web site as the date of notice.

CONCLUSIONS OF LAW

1. The Department has authority under the above indicated Statutes and Administrative Codes to issue a permit for the construction and maintenance of this project.

2. The Department has complied with s. 1.11, Wis. Stats.

NOTICE OF APPEAL RIGHTS

If you believe that you have a right to challenge this decision, you should know that the Wisconsin statutes and administrative rules establish time periods within which requests to review Department decisions shall be filed. For judicial review of a decision pursuant to sections 227.52 and 227.53, Wis. Stats., you have 30 days after the decision is mailed, or otherwise served by the Department, to file your petition with the appropriate circuit court and serve the petition on the Department. Such a petition for judicial review shall name the Department of Natural Resources as the respondent.

To request a contested case hearing of any individual permit decision pursuant to section 30.209, Wis. Stats., you have 30 days after the decision is mailed, or otherwise served by the Department, to serve a petition for hearing on the Secretary of the Department of Natural Resources, P.O. Box 7921, Madison, WI, 53707-7921. The petition shall be in writing, shall be dated and signed by the petitioner, and shall include as an attachment a copy of the decision for which administrative review is sought. If you are not the applicant, you must simultaneously provide a copy of the petition to the applicant. If you wish to request a stay of the project, you must provide information, as outlined below, to show that a stay is necessary to prevent significant adverse impacts or irreversible harm to the environment. If you are not the permit applicant, you must provide a copy of the petition to the permit applicant at the same time that you serve the petition on the Department.

The filing of a request for a contested case hearing is not a prerequisite for judicial review and does not extend the 30-day period for filing a petition for judicial review.

A request for contested case hearing must meet the requirements of section 281.36 (3q), Wis. Stats., and section NR 2.03, Wis. Adm. Code, and if the petitioner is not the applicant the petition must include the following information:

1. A description of the objection that is sufficiently specific to allow the department to determine which provisions of this section may be violated if the proposed discharge under the wetland individual permit is allowed to proceed.
2. A description of the facts supporting the petition that is sufficiently specific to determine how the petitioner believes the discharge, as proposed, may result in a violation of the provisions of this section.
3. A commitment by the petitioner to appear at the administrative hearing and present information supporting the petitioner's objection.
4. If the petition contains a request for a stay of the project, the petition must also include information showing that a stay is necessary to prevent significant adverse impacts or irreversible harm to the environment.

Dated at the Northeast Region Headquarters, Wisconsin on December 3, 2024.

STATE OF WISCONSIN DEPARTMENT OF NATURAL RESOURCES

For the Secretary

By:

Crystal Von Holdt
Waterway Program Policy Coordinator