

Appendix M. Environmental Justice Plan



I-39/90/94 Corridor Study

Environmental Justice Plan & Preliminary Analysis

June 2024

Wisconsin Department of Transportation

EXECUTIVE SUMMARY

The Interstate (I) – 39/90/94 Corridor Study Environmental Justice Plan and Analysis identifies and describes environmental justice populations and stakeholders within the I-39/90/94 Corridor Study boundaries. The main purpose of the plan and analysis is to determine if environmental justice populations would bear disproportionately high and adverse study effects. The results of this analysis will be presented in the I-39/90/94 Corridor Study Environmental Impact Statement.

ENVIRONMENTAL JUSTICE

The Wisconsin Department of Transportation (WisDOT) and Federal Highway Administration (FHWA) recognize the importance of implementing environmental justice into project development efforts. Title VI of the Civil Rights Act of 1964 and Executive Orders 12898 and 14096 are the key law and policy directives behind environmental justice assessment requirements. Title VI of the Civil Rights Act of 1964 prohibits intentional discrimination, as well as disparate impact discrimination, on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.

Executive Order 12898 directs federal agencies to take the appropriate and necessary steps to identify and address disproportionately high and adverse effects of federal projects on the health or environment of minority and low-income populations to the greatest extent practicable. Executive Order 14096 broadens the scope of Executive Order 12898 and offers agencies specific guidance on how to take environmental justice-related concerns into consideration while fulfilling their statutory mandates, including under the National Environmental Policy Act (NEPA). The order also expands communities of concern to all with environmental justice concerns, including individuals with limited English proficiency (LEP) and individuals with disabilities.

To determine if adverse effects will have disproportionately high and adverse effects on minority or low-income populations, the NEPA document must evaluate whether the adverse effect is predominately borne by a minority or low income population, or if the affect suffered by the minority or low income population will be appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the general population and whether practicable mitigation measures or alternatives exist that would avoid or reduce the disproportionately high and adverse effects on minority or low-income populations. Projects with disproportionately high and/or adverse effects on minority or low-income populations will only be carried out if further mitigation measures or alternatives that would avoid or reduce the disproportionately high and adverse effects are not practicable.

ENVIRONMENTAL JUSTICE PLAN AND PRELIMINARY ANALYSIS

The I-39/90/94 Corridor Study Environmental Justice Plan and Preliminary Analysis reflects WisDOT and FHWA's interest in environmental justice for stakeholders affected by or interested in the planning and implementation of the study. The environmental justice analysis will be completed in five phases. This document will address Phase I commitments including:

- o A plan to identify environmental justice populations and stakeholders in one-half mile of the proposed study limits shown in Figure 1.
- o Methodology to assess impacts to environmental justice populations in one-half mile of the proposed study limits.
- o A public engagement plan for environmental justice populations that live in the vicinity of the study.

The remaining four phases will be completed as part of the environmental document development and discussed in the environmental document. After the preliminary environmental justice population analysis is complete, the study team will evaluate whether the study may cause adverse or beneficial impacts to minority or low-income populations. The study team will compare those potential impacts to non-environmental justice populations, to determine if the impacts disproportionately effect minority or low-income populations. The study team will also evaluate alternatives that could mitigate any impacts. Direct, indirect and cumulative impacts will be documented in the I-39/90/94 Corridor Study Environmental Impact Statement (EIS).

Providing environmental justice groups full and fair participation in the study is another key component of the study's environmental justice outreach plan and public involvement strategy. Efforts to communicate and engage with environmental justice groups will continue through the study's completion.

Potential environmental justice populations in the vicinity of the I-39/90/94 Corridor Study were identified using United States Census Bureau data. A series of maps and tables provided herein give an overview of the various social and economic groups present in and in the vicinity (i.e., one-half mile analysis buffer) of the proposed study limits. The preliminary analysis included an analysis of environmental justice populations within one-half mile of the study limits as shown in Figure 2.

Results from the preliminary analysis have shown low-income populations and minority populations reside within the I-39/90/94 Corridor Study one-half mile analysis buffer and concentrate within certain regions. This document will detail those environmental justice populations and identify where they reside.

OUTREACH

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

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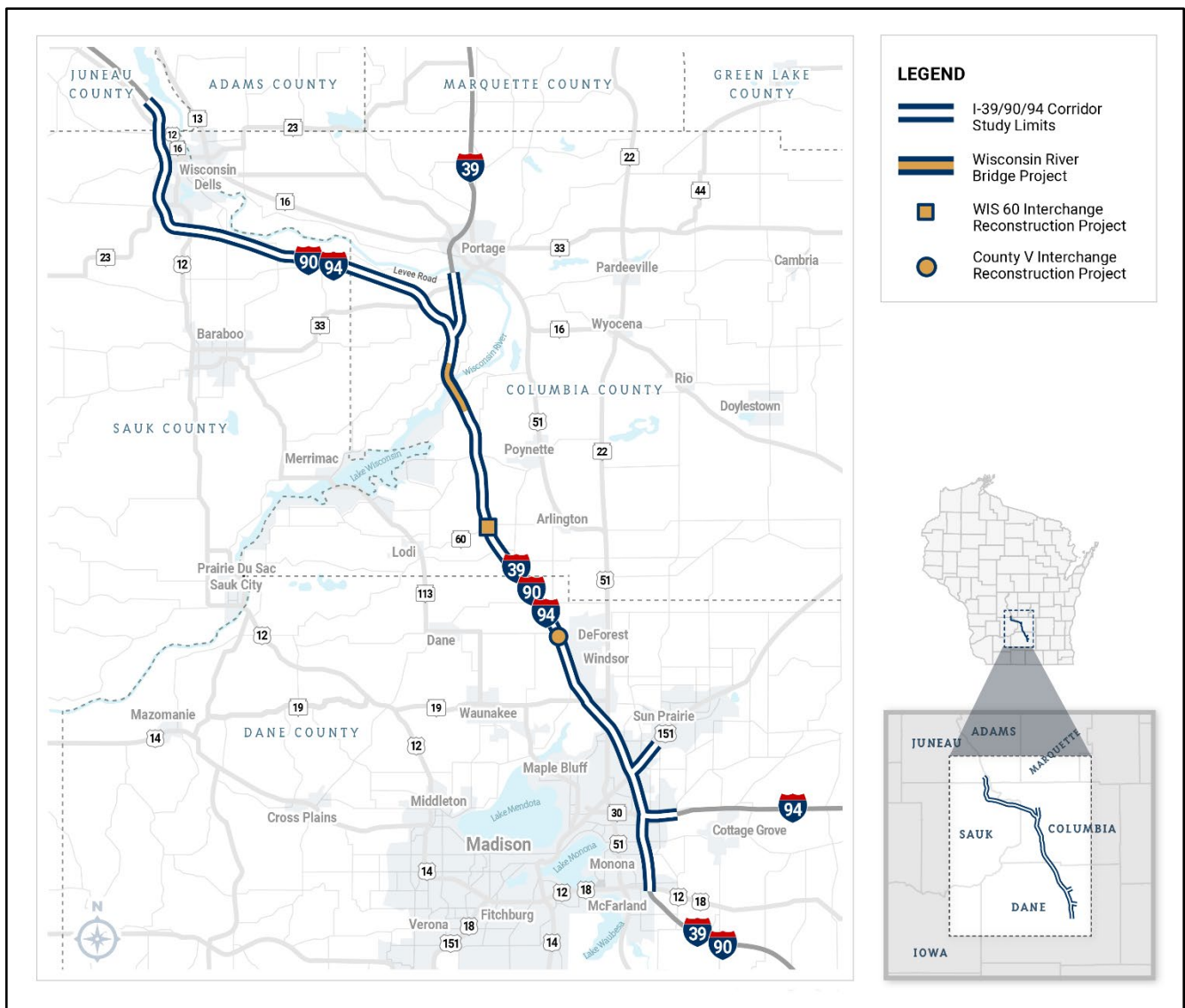
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1. Introduction

WisDOT and FHWA are conducting the I-39/90/94 Corridor Study between US Highway (US) 12/18 in Madison and US 12/Wisconsin State Highway (WIS) 16 in Wisconsin Dells, as shown in Figure 1. The study will also evaluate I-39 from its split with I-90/94 (I-39 I-90/94 Split Interchange) to Levee Road near the city of Portage. The study corridor is about 67 miles long and travels through Dane, Columbia, Sauk and Juneau counties. As a critical route for recreational travel and freight transport, the I-39/90/94 corridor is of vital importance to the economic health of the region and state. WisDOT’s environmental study of the I-39/90/94 corridor will focus on existing and future traffic demands, safety issues, and aging and outdated corridor infrastructure.

This I-39/90/94 Corridor Study Environmental Justice Plan and Preliminary Analysis identifies and describes environmental justice populations and stakeholders within and in the vicinity (one-half mile) of the I-39/90/94 Corridor Study limits. The plan analysis helps determine if there are disproportionately high and adverse effects of the project being borne by environmental justice populations. The results of this analysis will be presented in the I-39/90/94 Corridor Study EIS.

Figure 1: Study Corridor Geographic Location



2. Regulatory Context

Federal agencies are directed to incorporate environmental justice into their mission by developing strategies to analyze and mitigate negative impacts on minority, low-income, LEP and disabled populations. The US Department of Transportation (US DOT) and FHWA have provided a framework for integrating environmental justice into transportation decision-making. The I-39/90/94 Corridor Study environmental justice analysis addresses all federal requirements and guidance including:

- o **Title VI of the Civil Rights Act of 1964 (42 U.S.C. §§ 2000d – 2000d-7)**¹
 - o Title VI prohibits intentional discrimination, as well as disparate impact discrimination, on the basis of race, color, and national origin in programs and activities receiving federal financial assistance.
- o **Executive Order 12898: Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (1994)**²
 - o Executive Order 12898 serves as the basis for environmental justice implementation across all federal agencies within the executive branch. The order directs federal agencies to take the appropriate and necessary steps to identify and address disproportionately high and adverse effects of federal projects, policies and activities on the health or environment of minority and low-income populations to the greatest extent practicable. Environmental justice analyses must also be included in the NEPA process. Opportunities for minority and low-income communities to access public information and participate in the federal action must also be provided.
- o **Executive Order 14096: Revitalizing Our Nation’s Commitment to Environmental Justice for All (2023)**³
 - o Executive Order 14096 broadens the scope of Executive Order 12898 and offers agencies specific guidance on how to take environmental justice-related concerns into consideration while fulfilling their statutory mandates, including under NEPA. The order expands communities of concern to all with environmental justice concerns, including individuals with LEP and individuals with disabilities. Agencies are also required to identify and analyze disproportionate and adverse human health and environmental effects, including risks, cumulative impacts and effects related to climate change.
- o **US DOT Order 5610.2(c): Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (2021)**⁴
 - o The order reaffirms US DOT’s policy to consider environmental justice principles – separate from Title VI – in all US DOT programs, policies and activities. The order is a continuation of US DOT’s Environmental Justice Strategy and ensures disproportionately high and adverse effects to minority or low-income populations are identified and addressed through environmental justice analyses conducted as part of federal transportation planning and NEPA provisions. The order also describes specific measures to address instances of disproportionately high and adverse effects and sets forth relevant definitions.

¹ *Civil Rights, 42 U.S.C. § 2000d*. <http://www.gpo.gov/fdsys/pkg/USCODE-2010-title42/pdf/USCODE-2010-title42-chap21-subchapV.pdf>. Accessed 30 Jan. 2024.

² Executive Order 12898. 1994. <https://www.archives.gov/files/federal-register/executive-orders/pdf/12898.pdf>. Accessed 30 Jan. 2024.

³ Executive Order 14096. 2023. <https://www.federalregister.gov/documents/2023/04/26/2023-08955/revitalizing-our-nations-commitment-to-environmental-justice-for-all>. Accessed 30 Jan. 2024.

⁴ US DOT. 2021. Order 5610.2(c). <https://www.transportation.gov/sites/dot.gov/files/2021-08/Final-for-OST-C-210312-003-signed.pdf>. Accessed 30 Jan. 2024.

- o **US DOT Guidance:** Guidance to Federal Financial Assistance Recipients Regarding LEP (2005)⁵
 - o US DOT guidance directs recipients of federal assistance to provide persons with LEP meaningful access to their programs and activities, according to Title VI regulations of the Civil Rights Act of 1964. Recipients of federal assistance are also required to conduct an individual assessment that balances the following four factors: (1) *The number or proportion of LEP persons eligible to be served or likely to be encountered by a program, activity, or service of the recipient or grantee;* (2) *the frequency with which LEP individuals come in contact with the program;* (3) *the nature and importance of the program, activity, or service provided by the recipient to people's lives;* and (4) *the resources available to the recipient and costs.*
- o **FHWA Order 6640.23A:** Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (2012)⁶
 - o FHWA Order 6640.23A describes the policies and procedures FHWA uses to comply with Executive Order 12898. Furthermore, the order reaffirms FHWA's longstanding policy to ensure nondiscrimination in federally funded activities. FHWA should take into account mitigation and enhancement measures that avoid or minimize impacts on minority and low-income populations, offsetting the benefits and/or impacts of other system elements. If the high and adverse impacts are found to be borne disproportionately by low-income populations and minority populations, an analysis must examine mitigation measures, offsetting benefits and impacts of other system elements.
 - o The order also includes definitions for the following environmental justice terms used to quantify the level of impact to environmental justice populations:
 - **Adverse effects:** *The totality of significant individual or cumulative human health or environmental effects, including interrelated social and economic effects, which may include, but are not limited to the following: bodily impairment, infirmity, illness, or death; air, noise, and water pollution and soil contamination; destruction or disruption of man-made or natural resources; destruction or diminution of aesthetic values; destruction or disruption of community cohesion or a community's economic vitality; destruction or disruption of the availability of public and private facilities and services; vibration; adverse employment effects; displacement of persons, businesses, farms, or nonprofit organizations; increased traffic congestion, isolation, exclusion, or separation of minority or low-income individuals within a given community or from the broader community; and the denial of, reduction in, or significant delay in the receipt of, benefits of FHWA programs, policies, or activities.*
 - **Disproportionately high and adverse effects on low-income populations and minority populations:**
An adverse effect that:
 - (1) *is predominately borne by a minority population and/or a low-income population;* or
 - (2) *will be suffered by the minority population and/or low-income population and is appreciably more severe or greater in magnitude than the adverse effect that will be suffered by the non-minority population and/or non-low-income population.*

⁵ US DOT. 2005. *Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons.* <https://www.transportation.gov/sites/dot.gov/files/2020-01/Guidance%20to%20Federal%20Financial%20Assistance%20Recipients%20Regarding%20LEP%20-%200508.pdf>. Accessed 15 November 2023.

⁶ FHWA. 2012. *Actions to Address Environmental Justice in Minority Populations and Low-Income Populations.* <https://www.fhwa.dot.gov/leqsregs/directives/orders/664023a.cfm>. Accessed 16 November 2023

o **FHWA Guidance: Guidance on Environmental Justice and NEPA (2011)**⁷

- o FHWA guidance outlines the process to address Environmental Justice during the NEPA review, including documentation requirements, as well as detailing elements and steps to be followed. The memorandum supplements FHWA Technical Advisory T 6640.8A, 1987, which provides guidance for documenting the potential social, economic and environmental impacts considered in the selection and implementation of highway projects.⁸ This guidance applies to all NEPA classes of action and requires the following steps:
 - Identification of existing minority populations or low-income populations
 - Explanation of coordination, access to information and participation of environmental justice populations
 - Identification of disproportionately high and adverse effects (if applicable) on environmental justice populations

3. Purpose

3.1. Environmental Justice Analysis

WisDOT and FHWA will complete an environmental justice analysis, as part of the EIS, to determine whether the I-39/90/94 Corridor Study has the potential to incur disproportionately high and adverse effects upon minority populations or low-income populations.

If high and adverse impacts are found to be borne disproportionately by low-income populations and minority populations, an analysis must examine mitigation and enhancement measures that avoid or minimize impacts, offsetting benefits and/or impacts of other system elements. Projects with disproportionately high and/or adverse effects on environmental justice populations will only be conducted if further mitigation measures or alternatives that would avoid or reduce the disproportionately high and adverse effects are not practicable.

3.2. Preliminary Analysis

The I-39/90/94 Corridor Environmental Justice Plan and Preliminary Analysis identifies a set of goals, recommended target audiences and proposed deliverables. The plan also defines criteria to identify and communicate with minority persons and low-income persons located within the one-half mile analysis buffer, as well as strategies to assess impacts and mitigate potential adverse impacts on those populations.

A one-half mile analysis area was selected to capture the characteristics of populations most likely to experience daily construction related effects resulting from build alternatives. Persons and businesses closer to the corridor may experience a higher degree of direct effects from the build alternatives, while those farther away would likely experience less direct, but more indirect effects. WisDOT may evaluate minority and low-income populations closer than one-half mile during later phases of the environmental justice analysis.

Analysis will include close coordination with public outreach efforts and will document communication between WisDOT and leaders, groups and individuals representing minority groups and low-income groups within the one-half mile analysis buffer. Information, results of analyses and feedback received from stakeholders will be documented and provided to the study team throughout the process.

⁷ FHWA. 2011. *Guidance on Environmental Justice and NEPA*. https://www.environment.fhwa.dot.gov/env_topics/ej/guidance_ejustice-nepa.aspx? gl=1*w3n8jz* qa*MTE4ODUwMDk3NS4xNjkxNjAyNjM3* qa VW1SFWJKBB*MTcwMDA3MjUwMy4yMi4xLjE3MDAwNzQxMzUuMC4wLjA. Accessed 15 November 2023.

⁸ FHWA. 1987. *Guidance for Preparing and Processing Environmental and Section 4(f) Documents*. https://www.environment.fhwa.dot.gov/legislation/nepa/guidance_preparing_env_documents.aspx. Accessed 15 November 2023.

4. Goals

Goals of the I-39/90/94 Corridor Environmental Justice Plan and Preliminary Analysis include:

- o Identifying and locating minority populations and/or low-income populations within a study area of one-half mile surrounding the proposed study limits.⁹
- o Conducting outreach and building open lines of communication to engage minority and low-income stakeholders in discussion to identify interests, questions, concerns and obtain feedback into the proposed project design.

The Environmental Justice Plan and Preliminary Analysis includes an outreach component and thus becomes closely tied with the public involvement effort.¹⁰ The I-39/90/94 corridor study team anticipates that the efforts outlined in this plan will enhance the public involvement process and encourage interested and potentially affected parties to share ideas, expectations and concerns for the study and future WisDOT projects.

Preliminary analysis results will assist the study team in determining if potential disproportionately high and adverse human health and environmental impacts may occur as a result of the I-39/90/94 Corridor Study. This preliminary analysis will be included as part of the EIS.

5. Analysis Methodology

For the study to achieve its primary purpose, the environmental justice analysis must provide information on minority and low-income populations. While the primary objective of the environmental justice analysis is to assess adverse effects and determine if there are disproportionately high and adverse effects to minority populations and low-income populations resulting from proposed actions; it is important that the analysis also provides information on low-income and minority populations. With this information, WisDOT can develop alternatives to address any recurring study related community-wide problems. Demographic and economic data at the regional, state and federal levels will be obtained from resources described in Section 5.3. Data from the US Census Bureau will initially be analyzed to determine stakeholder make-up and best identify and assess their needs.

The I-39/90/94 Corridor is surrounded by many different and distinct communities, neighborhoods and organizations. The pool of environmental justice stakeholders is also large and diverse. The study team will use both qualitative and quantitative processes to gather stakeholder input on the potential impacts of design alternatives identified during the environmental process, as well as data gathering using various demographic and economic data resources available at the regional, state and federal levels.

The preliminary analysis will include, but not be limited to, identifying the following within the project limits:

- o Low-income populations
- o Minority populations
- o LEP populations
- o Community organizations and businesses significant to environmental justice
- o Preferred contact person at each identified local government

⁹ *Minority populations and low-income populations are two distinct population categories. Executive Order 12898 applies to both categories independent of one another.*

¹⁰ *See I-39/90/94 Corridor Study Public Involvement Plan.*

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

5.1. Environmental Justice Populations

Pursuant to Executive Order 12898, WisDOT conducted a preliminary analysis of the various demographic groups located near the study corridor. The analysis included focused communication and outreach to environmental justice groups. The study team used US Census block group data, supplemented by the study team's extensive public involvement program, and other relevant data sources to determine the presence of minority and low-income populations in the one-half mile analysis buffer.

Demographic terms used in the analysis are defined below and are consistent with FHWA 6640.23A and US Census Bureau definitions. Demographic terms include the following:

Minority – a person who is:

- o **Black or African American:** *having origins in any of the Black racial groups of Africa;*
- o **Hispanic or Latino:** *of Mexican, Puerto Rican, Cuban, South American or other Spanish culture or origin, regardless of race;*
 - o Hispanic is an ethnic group, not a race and is expressed separately from race in US Census Bureau data. Persons identifying as Hispanic also have a racial identity (e.g., White, Black, Asian, etc.).
- o **Asian American:** *having origins in any of the original peoples of the Far East or Southeast Asia, the Indian subcontinent;*
- o **American Indian and Alaska native:** *having origins in any of the original people of North America, South America, and who maintains cultural identification through tribal affiliation or community recognition;*
- o **Hawaiian Native or other Pacific Islander:** *having origin in any of the original peoples of Hawaii, Guam, Samoa or other Pacific Islanders; or*
- o **Two or more races:** *people who chose to provide two or more races*

Minority Population: *any readily identifiable groups of minority persons who live in geographic proximity, and if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed FHWA program, policy, or activity.*

Low-income: *a person whose median household income is at or below the Department of Health and Human Services (HHS) poverty guidelines.¹¹*

Low-income Population: *any readily identifiable group of low-income persons who live in geographic proximity, and, if circumstances warrant, geographically dispersed or transient persons – such as migrant workers or Native Americans – who would be similarly affected by a proposed FHWA policy or activity.*

Limited English Proficiency: *individuals who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English can be limited English proficient, or “LEP,” and, therefore, are entitled to language assistance under Title VI of the Civil Rights Act of 1964 with respect to a particular type of service, benefit, or encounter.⁵*

¹¹ US Department of Health and Human Services. 2023. HHS Poverty Guidelines for 2023. <https://aspe.hhs.gov/poverty-guidelines>. Accessed 31 Jan. 2024.

Disability - with respect to an individual means:¹²

- o *a physical or mental impairment that substantially limits one or more major life activities of such individual;*
- o *a record of such an impairment; or*
- o *being regarded as having such an impairment*

Other population groups not protected under the Executive Order 12898, Executive Order 14096 or agency policy, but may be potentially affected by the proposed action:

- o Elderly (Age Discrimination Act)¹³
- o Children¹⁴
- o Persons with no access to a personal vehicle

5.2. Analysis Phases

The environmental justice analysis will be completed in five phases as summarized below. This document will address Phase I. The other four phases will be completed as part of EIS development and discussed in the EIS.

5.2.1. Phase I – Identify and Describe Stakeholders Within the One-half Mile Analysis Buffer

1. Develop a base map of the defined limits of the proposed corridor (Figure 1).
2. Define the environmental justice study area by overlaying the proposed study limits with a one-half mile analysis buffer (Figure 2). Identify the range of potential environmental justice stakeholders within the one-half mile analysis buffer.
3. Determine the presence and estimate the size of the minority populations and/or low-income populations within the one-half mile analysis buffer, including populations with limited English proficiency (LEP).
4. Identify and give a brief demographic description of the minority populations and/or low-income populations within the one-half mile analysis buffer.
5. Where appropriate, identify and give a brief description of communities within the one-half mile buffer.
6. Where appropriate, develop a community profile to include applicable and/or appropriate neighborhood boundaries, demographic information, economic data and other pertinent data.

Areas of interest to the environmental justice analysis will be identified through part of the public involvement team’s outreach specialists and socioeconomic analysis efforts. These efforts include identification and consideration of the location and nature of neighborhoods and residents within the one-half mile analysis buffer, a brief overview of the local social history of the communities within the area and land use plans.

5.2.2. Phase II – Identify and Define Socioeconomic and Environmental Factors Along the Corridor

Pursuant to WisDOT’s policy and procedures, analysis of socioeconomic factors requires an analysis that extends beyond quantifiable aspects to non-quantifiable aspects such as a community’s values and history. Gathering values from affected communities provides opportunity to ensure equitable actions have been considered in development of transportation alternatives. Analysis of socioeconomic and environmental

¹² *Federal Register*. 2016. Amendment of Americans with Disabilities Act Title II and Title III Regulations to Implement ADA Amendments Act of 2008. <https://www.federalregister.gov/documents/2016/08/11/2016-17417/amendment-of-americans-with-disabilities-act-title-ii-and-title-iii-regulations-to-implement-ada>. Accessed 31 Jan. 2024.

¹³ See Appendix #8: Age Discrimination Act, accessed November 2022, Age Discrimination Act

¹⁴ Executive Order 13045

factors will be addressed as part of the EIS and will include from this effort, but not to be limited to: neighborhood and community cohesion, regional economic impacts and public and private development plans.

5.2.3. Phase III – Identify and Assess Issues and Concerns of Environmental Justice Stakeholder Populations in the One-half Mile Analysis Buffer

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

5.2.4. Phase IV – Analysis of Impacts to Environmental Justice Populations

Assess, through both qualitative and quantitative processes, whether effects to minority and/or low-income populations are beneficial or adverse.

Review considerations include:

- o Are the effects proportionate or disproportionate to those experienced by non-minority and/or non-low-income populations?
- o Are the effects direct, indirect or cumulative?
- o Are there any disproportionately high and adverse effects that are predominantly borne by minority and/or low-income populations?
- o What are the comparative effects experienced by minority and low-income populations and are they more severe or greater in magnitude than the adverse effects suffered by non-minority?
- o Are any of the minority populations protected under Title VI of the 1964 Civil Rights Act, which prohibits discrimination on the basis of race, color or country of origin?
- o Consider the Age Discrimination Act or Americans with Disabilities Act.
- o Provide data, support and brief analysis for consideration in the development of the EIS. Review discussion of the potential mitigation and enhancement efforts to address disproportionately high and adverse effects to environmental justice populations

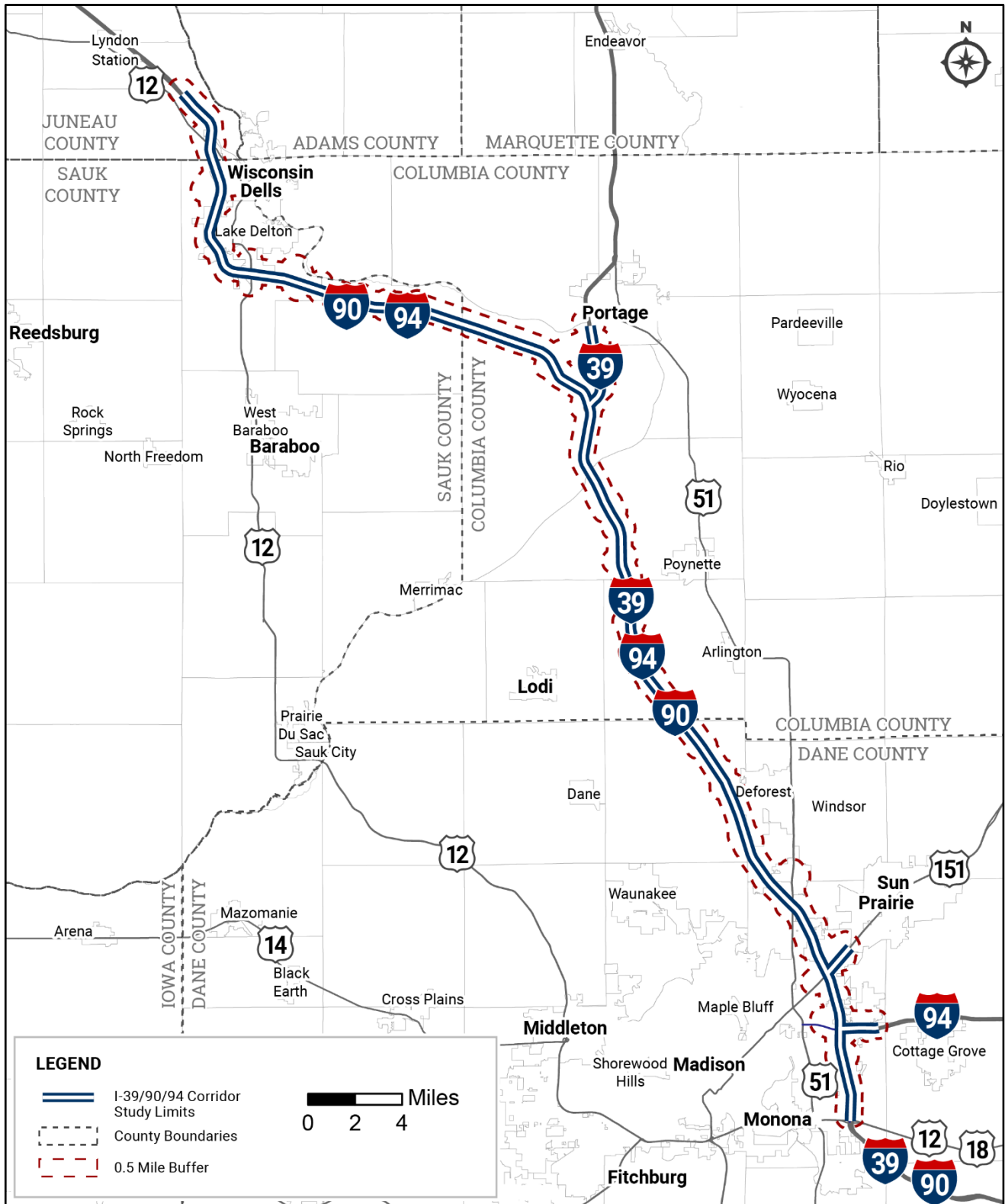
5.2.5. Phase V – Environmental Justice Link to Public Involvement

Public involvement serves a vital role in educating citizens about the transportation development process. Public involvement also increases the likelihood an alternative can be implemented through informed consent from all groups. As the I-39/90/94 Corridor Study's environmental justice analysis is tied to public involvement, the study's communication efforts will strive to ensure the full and fair participation of minority populations and low-income groups.

5.3. Environmental Justice Study Area

The I-39/90/94 Corridor Study environmental justice study area is comprised of a one-half mile analysis buffer surrounding the proposed I-39/90/94 study limits as seen in Figure 2. For baseline comparisons to the one-half mile analysis buffer, demographic information was obtained from Dane, Columbia, Sauk and Juneau counties, and the State of Wisconsin.

Figure 2: I-39/90/94 Corridor One-half Mile Analysis buffer



5.4. Data Sources

Data from the US Census Bureau, American Community Survey (ACS) 2017-2021 5-Year Estimates were used to determine minority, low-income, LEP and disabled populations at the state, county, city and one-half mile analysis buffer levels. The ACS is an ongoing survey providing data on age, sex, race, family and relationships, income and benefits, health insurance, education, veteran status, disabilities, where people live and work, modes of transportation, and the cost of essential goods. In general, ACS estimates describe the average characteristics of population and housing over a period of time.

The proportion of each US Census Bureau census geographic unit intersecting the one-half mile buffer was included in the analysis. ACS census block group data was used for analyses of race, ethnicity and income when available; otherwise, census tract was used as noted. A census block is the smallest geographical unit used by the US Census Bureau to collect and tabulate data from the decennial (i.e., ten year) census. A census block group is a compilation of census blocks. A census tract is a larger geographical unit that is made up of several census block groups. Census tracts are typically more diverse than census blocks or block groups. US Census Bureau uses census tracts to report data on social, economic and demographic characteristics at a local level.

The US Department of Health and Human Services (HHS) annually publishes poverty guidelines to determine financial eligibility for certain programs. According to HHS, a family is considered in poverty if their income is lower than the poverty threshold for their family size. In 2021, a family of four would be considered in poverty if the family's total income was less than \$26,500. HHS guidelines are a simplification of the US Census Bureau's poverty thresholds for use for administrative purposes; for instance, determining financial eligibility for certain federal programs. Therefore, US Census Bureau 2021 poverty guidelines were used, in place of HHS poverty guidelines, to set the poverty threshold for this analysis.

Stakeholders not located directly within the area designated for analysis may be identified through the public involvement process. Due to the interconnectedness between environmental justice and public involvement, the environmental justice analysis may incorporate considerations of issues raised as part of the public involvement effort where appropriate.

6. Environmental Justice Preliminary Analysis

6.1. Summary of Findings

This section provides a summary of Phase 1 environmental justice analysis findings for the I-39/90/94 Corridor Study. The one-half mile analysis buffer is a mix of highly urbanized areas around the Madison metropolitan area and rural landscapes to the north of Madison. Populations are most concentrated in block groups located in the Madison metropolitan area, the city of Portage and near Wisconsin Dells. Figure 3 shows the total population of each Census block group.

Within the one-half mile analysis buffer, minority populations make up 23.8% of the total population. The largest minority populations in the one-half mile analysis buffer – as a percent of the total population – identify as Black or African American (7.9%), Hispanic (6.5%) and Asian American (5.9%).

Median annual household income within the one-half mile analysis buffer is \$76,993, this is about \$10,000 greater than the median household income for the State of Wisconsin. The percentage of families living in poverty in the one-half mile analysis buffer was 3.8%. This was 2.8% less than the percentage of families in poverty for the State of Wisconsin (6.6%). Populations in the northern portions of the one-half mile analysis buffer and in the city of Madison near the I-39/90/94 mainline had comparatively lower median household incomes and higher percentages of families living below the poverty threshold.

6.2. Race and Ethnicity

Demographics within the one-half mile analysis buffer have been identified and compared with the demographics and economics of Dane, Columbia, Sauk, and Juneau counties and the State of Wisconsin, as shown in Table 1.

6.2.1. Minority Population

The total minority population within the one-half mile analysis buffer makes up 23.8% of the total population (Table 1). Total minority population is the sum of all non-white race groups. The percentage of minorities in the one-half mile analysis buffer is higher than the reference counties and the state of Wisconsin (19.9%). In fact, minorities in the one-half mile analysis buffer occur at more than double the rate as compared to Columbia, Sauk and Juneau counties. Figure 4 illustrates where minority populations are located in and near the I-39/90/94 one-half mile analysis buffer.

In general, minority populations comprise a higher percentage of the total population in the US Census block groups around the Madison metropolitan area and near the Wisconsin Dells. The top three minority populations in the one-half mile analysis buffer identify as Black or African American (7.9%), Hispanic (6.5%) and Asian American (5.9%). Hawaiian Native or other Pacific Islander and Other make up less than 0.5% of the minority population and may not be further depicted in this analysis.

Individual races and ethnicities were also observed to cluster in specific locations in the vicinity of the I-39/90/94 corridor in the Madison metropolitan area and the Wisconsin Dells. The following will describe key minority demographics in these two areas.

Madison Metropolitan Area Minority Population

Minority population demographic characteristics observed along the I-39/90/94 corridor in the Madison area:

- o Individuals identifying as Black or African American tended to reside in greater concentrations (above 15%) near the USH 151 Interchange, I-94/WIS 30 Interchange and around the Dane County airport (Figure 6).
- o Individuals identifying as Hispanic tended to reside in greater concentrations (above 15%) near the I-94/WIS 30 Interchange and around the Dane County Regional Airport (Figure 7).
- o Individuals identifying as Asian American tended to reside in greater concentrations (above 15%) around the I-94/WIS 30 Interchange (Figure 8).

Wisconsin Dells Minority Population

Minority population demographic characteristics observed along the I-90/94 corridor in the Wisconsin Dells area:

- o Individuals identifying as Black or African American tended to reside in greater (greater than 5%) concentrations on the eastern side of the corridor between Mirror Lake and Lake Delton (Figure 9).
- o Individuals identifying as Hispanic tended to reside in greater concentrations (greater than 10%) on the eastern side of the corridor along the Sauk County side of the Wisconsin Dells (Figure 10).
- o Individuals identifying as Asian American tended to reside in greater concentrations (above 5%) on the southeast side of the corridor (Figure 11).

6.2.2. White Population

Populations identifying as White alone, comprise most (76.2%) of the one-half mile buffer, as shown in Table 1. In the central and north-central portions of the I-39/90/94 study corridor, over 90% of the population identifies as White alone as seen in Figure 5. In the city of Madison, Dane County, the percentage of the population identifying as White alone varies from less than 25% to greater than 90%, depending on block group.

The following table and figures describe demographic and economic data provided from the US Census 2021 ACS. For race, ethnicity and economic categories, Census block groups were the geographic entity used, unless otherwise noted. Actual counts and percentages are displayed for select populations within each Census unit for the analysis area.

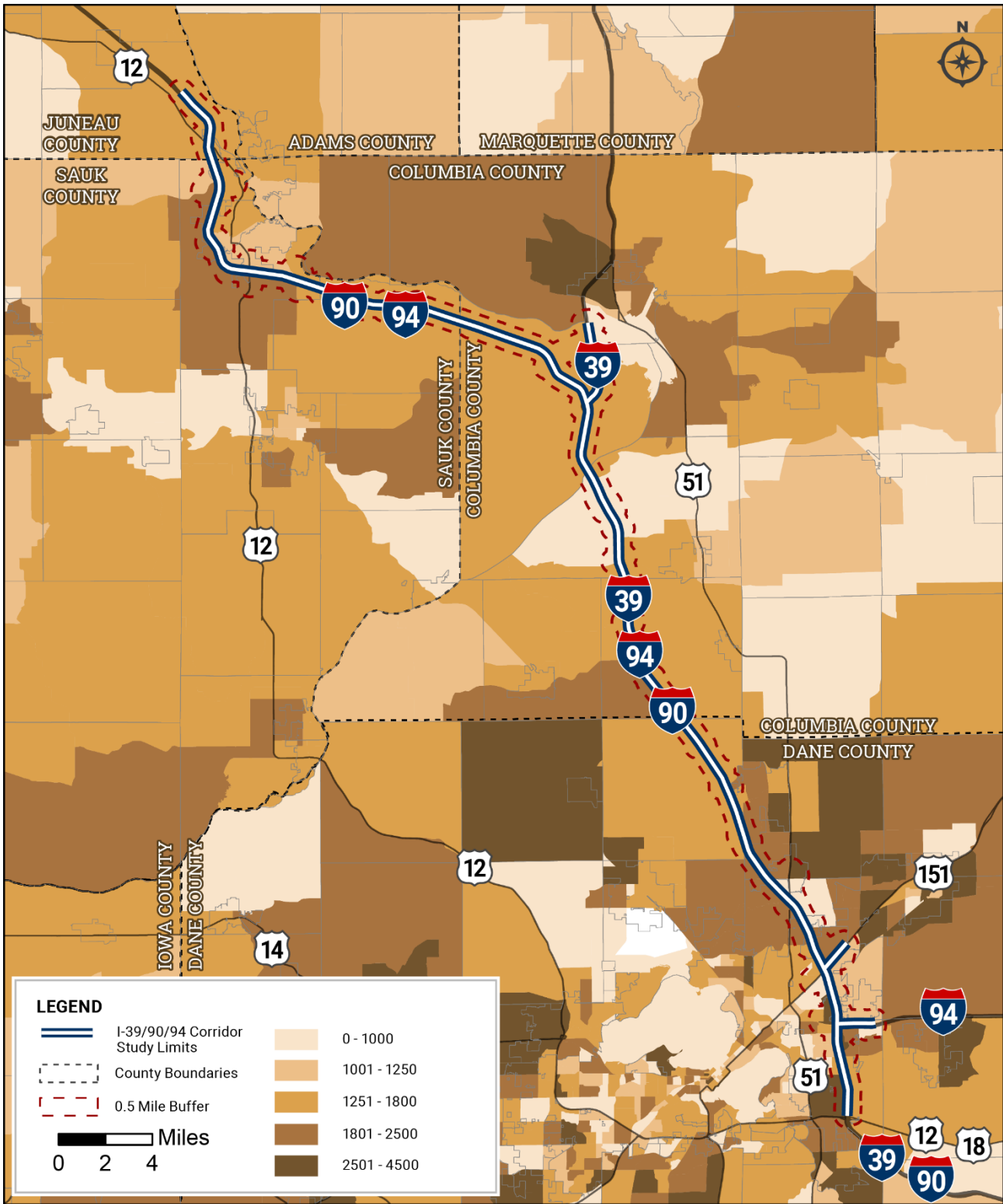
6.2.3. Demographic Break Down

Table 1: I-39/90/94 Population Demographics, Race and Ethnicity

	One-half Mile Analysis Buffer		Dane County		Columbia County		Sauk County		Juneau County		State of Wisconsin	
	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%
Population	47,508	100.0	555,474	100.0	58,219	100.0	65,428	100.0	26,595	100.0	5,871,661	100.0
White	36,219	76.2	434,318	78.2	53,306	91.6	58,743	89.8	23,904	89.9	4,705,965	80.1
Minority	11,289	23.8	121,156	21.8	4,913	8.4	6,685	10.2	2,691	10.1	1,165,696	19.9
Black or African American	3,763	7.9	27,528	5.0	1,008	1.7	524	0.8	627	2.4	364,446	6.2
American Indian	143	0.3	1,138	0.2	169	0.3	749	1.1	194	0.7	39,457	0.7
Asian American	2,789	5.9	33,102	6.0	512	0.9	316	0.5	143	0.5	165,139	2.8
Native Hawaiian Pacific Islander	23	0.0	193	0.0	5	0.0	0	0.0	7	0.0	2,395	0.0
Other	64	0.1	1,786	0.3	33	0.1	69	0.1	11	0.0	12,531	0.2
Two or More	1,461	3.1	20,244	3.6	989	1.7	1,353	2.1	836	3.1	157,130	2.7
Hispanic	3,048	6.5	37,165	6.7	2,197	3.8	3,674	5.6	873	3.3	424,598	7.2

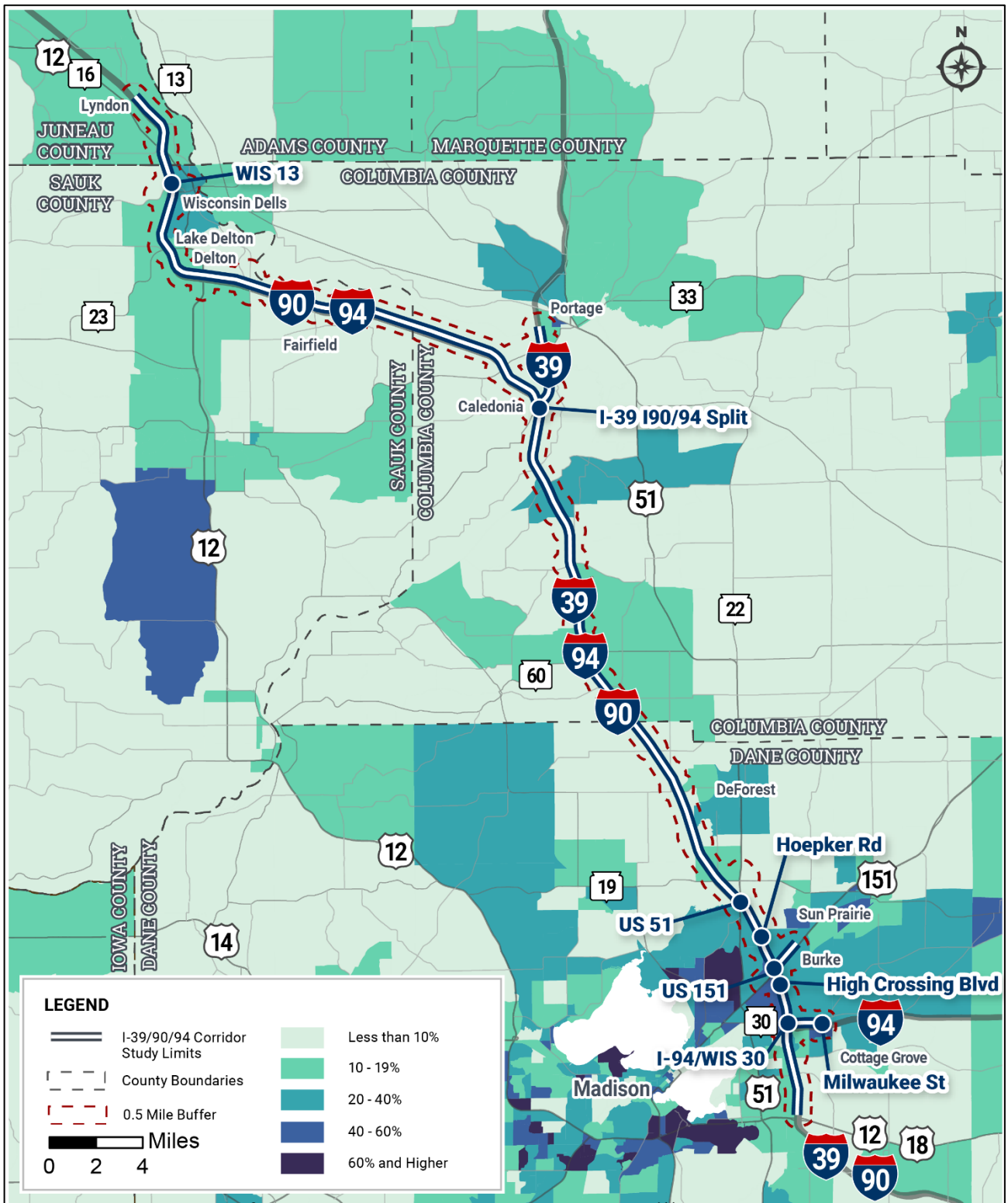
Source: US Census, 2021 ACS 5-Year (2017-2021) Data

Figure 3: Total Population in I-39/90/94 Corridor



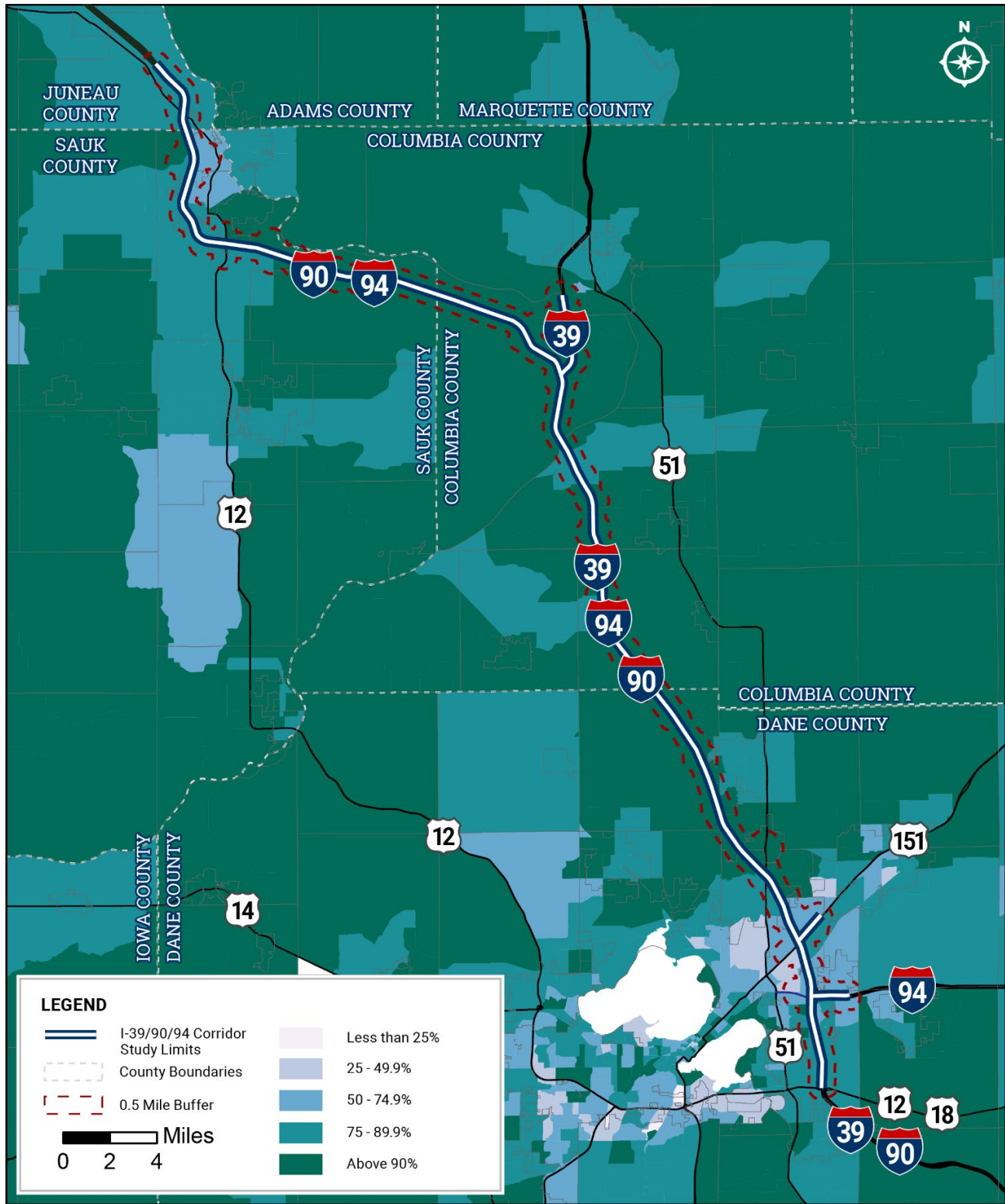
Source: US Census, 2021 ACS 5-Year (2017-2021) Block Group Level Data

Figure 4: I-39/90/94 Corridor: Minority Population



Source: US Census, 2021 ACS 5-Year (2017-2021) Block Group Level Data

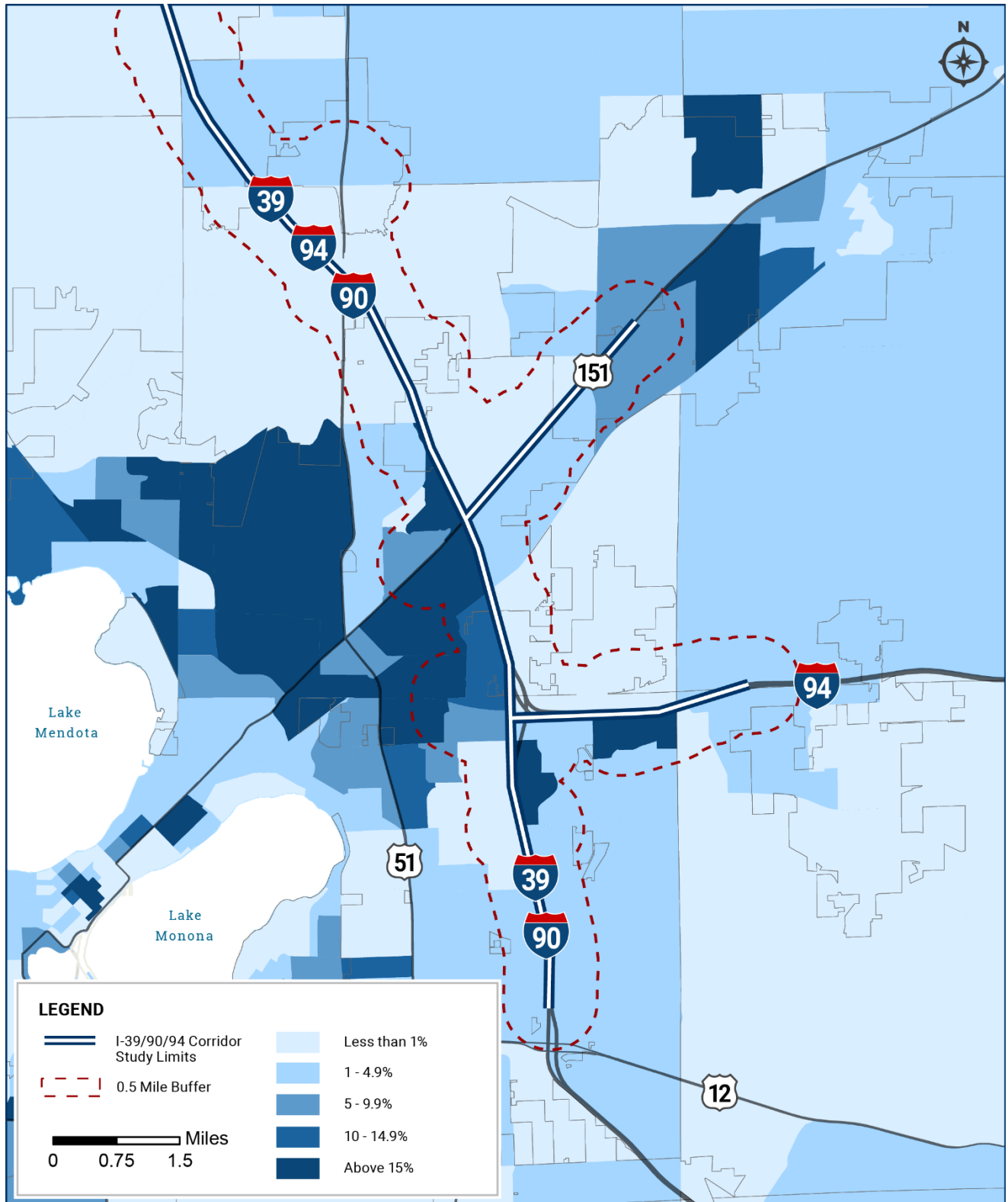
Figure 5: I-39/90/94 Corridor: White Population Alone (Not Hispanic or Latino)



Source: US Census, 2021 ACS 5-Year (2017-2021) Block Group Level Data

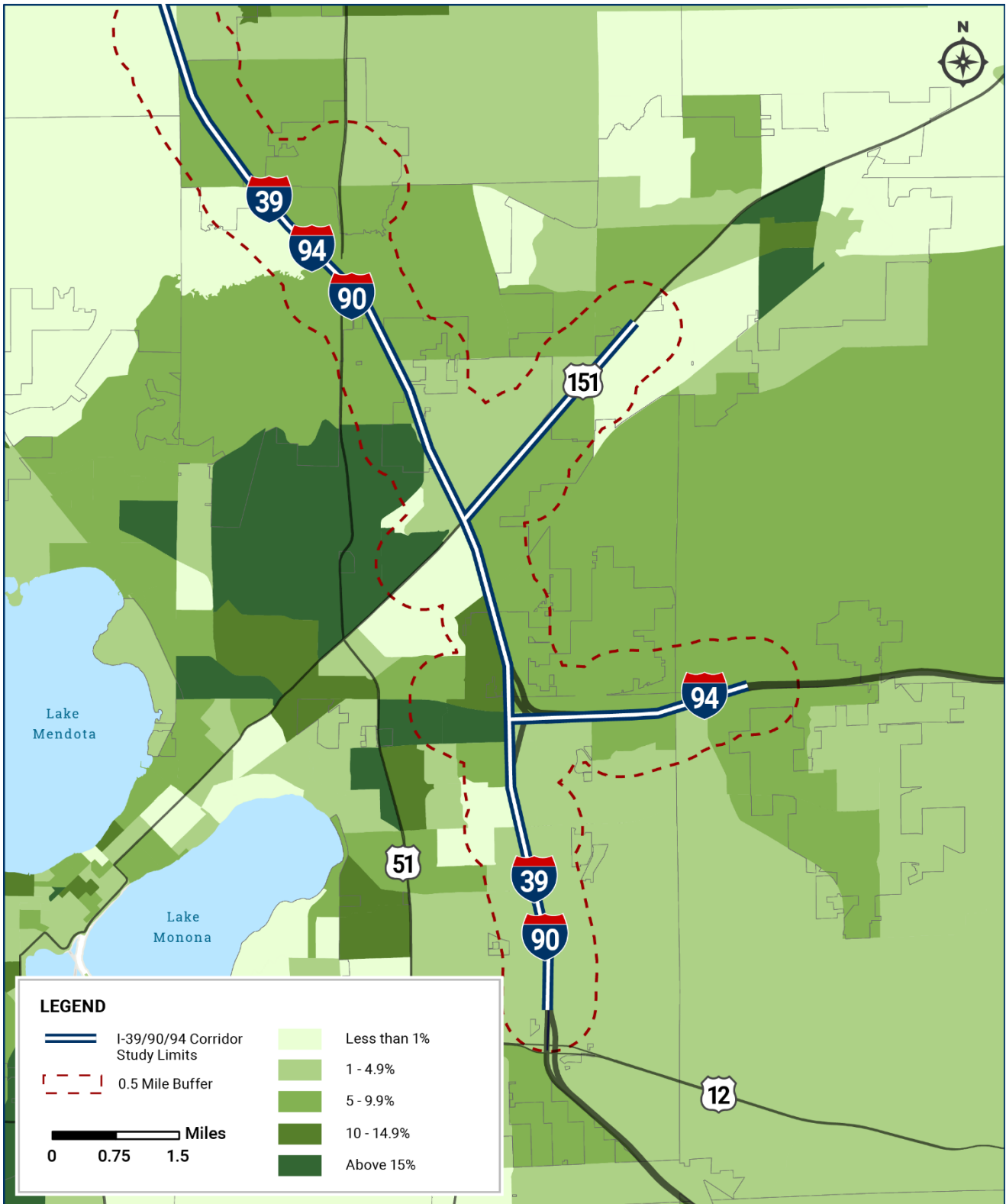
Madison Metropolitan Area Minority Population Figures

Figure 6: Percent Black or African American Population within the One-half Mile Buffer – Madison



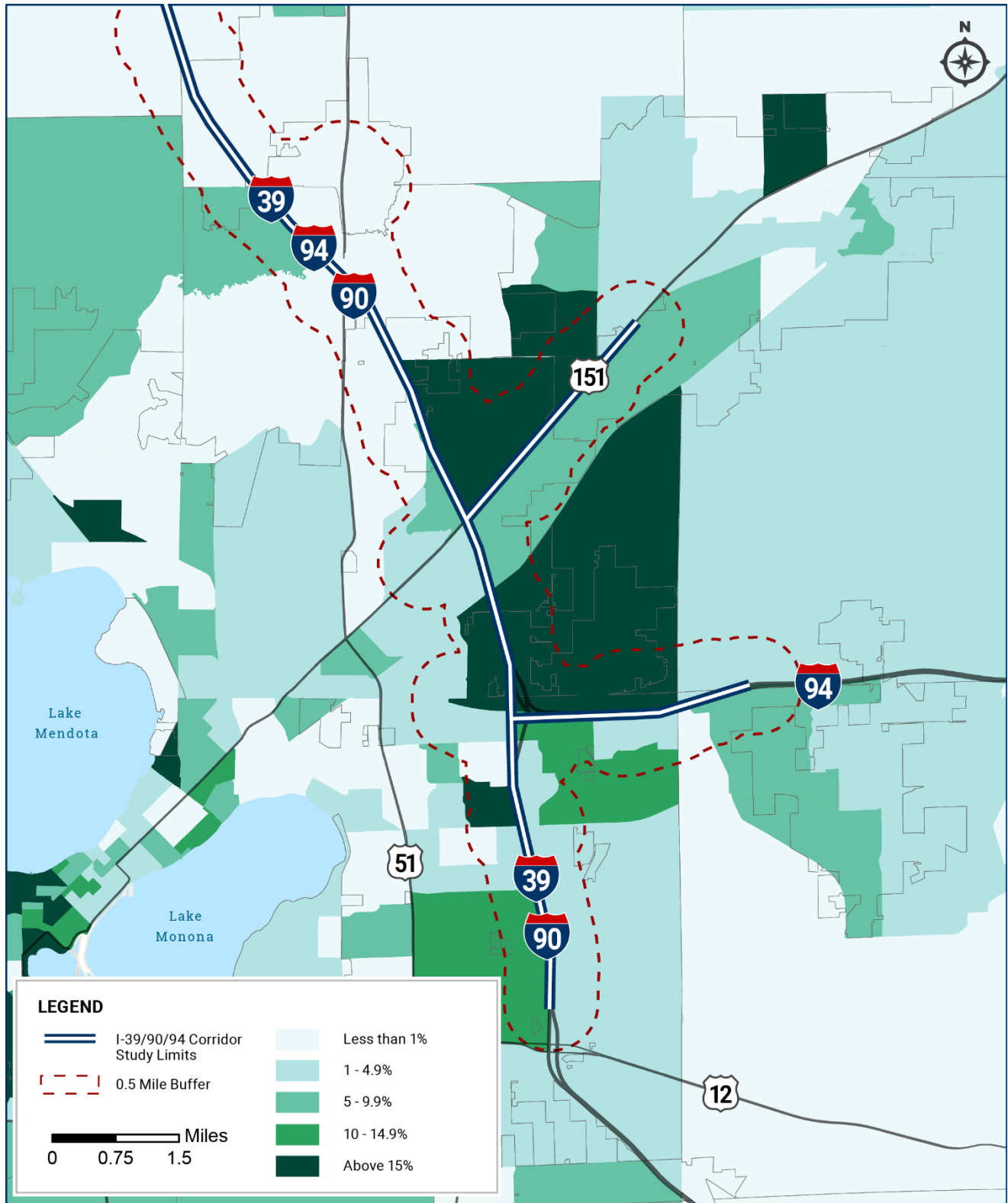
Source: US Census, 2021 ACS 5-Year (2017-2021) Block Group Level Data

Figure 7: Percent Hispanic Population within the One-half Mile Buffer – Madison



Source: US Census, 2021 ACS 5-Year (2017-2021) Block Group Level Data

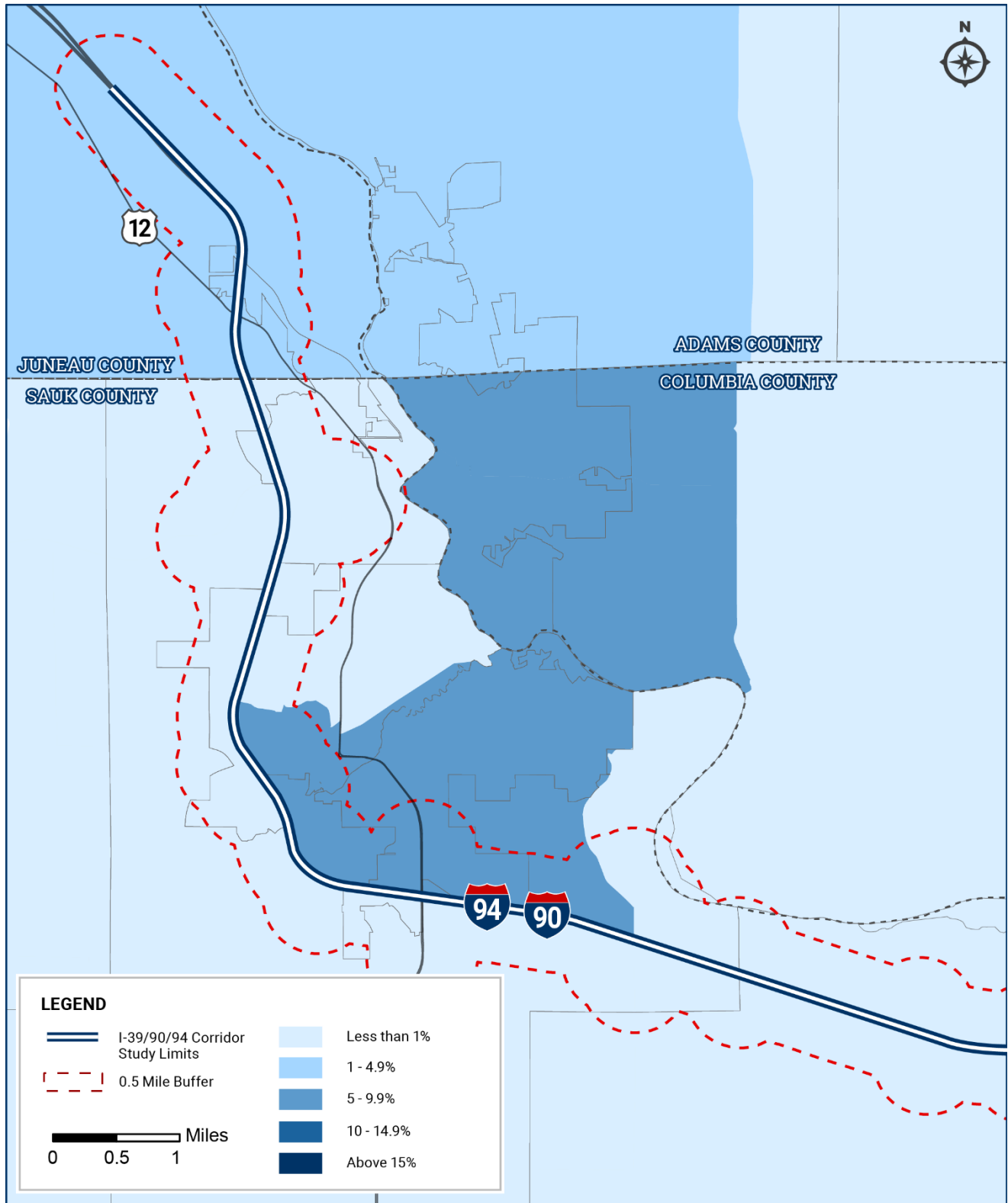
Figure 8: Percent Asian Population within the One-half Mile Buffer – Madison



Source: US Census, 2021 ACS 5-Year (2017-2021) Block Group Level Data

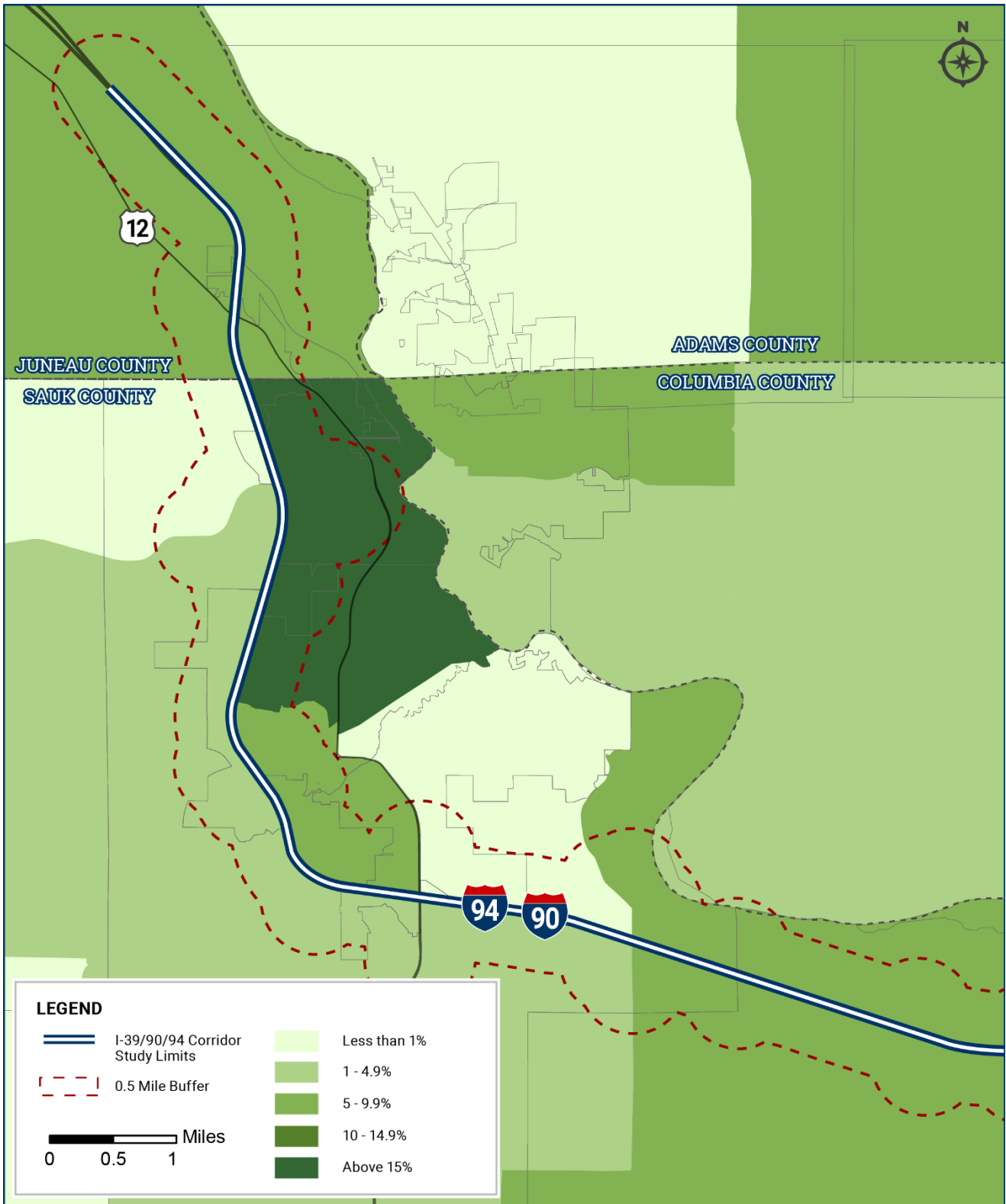
Wisconsin Dells Area Minority Population Figures

Figure 9: Percent Black or African American Population within the One-half Mile Buffer – Wisconsin Dells



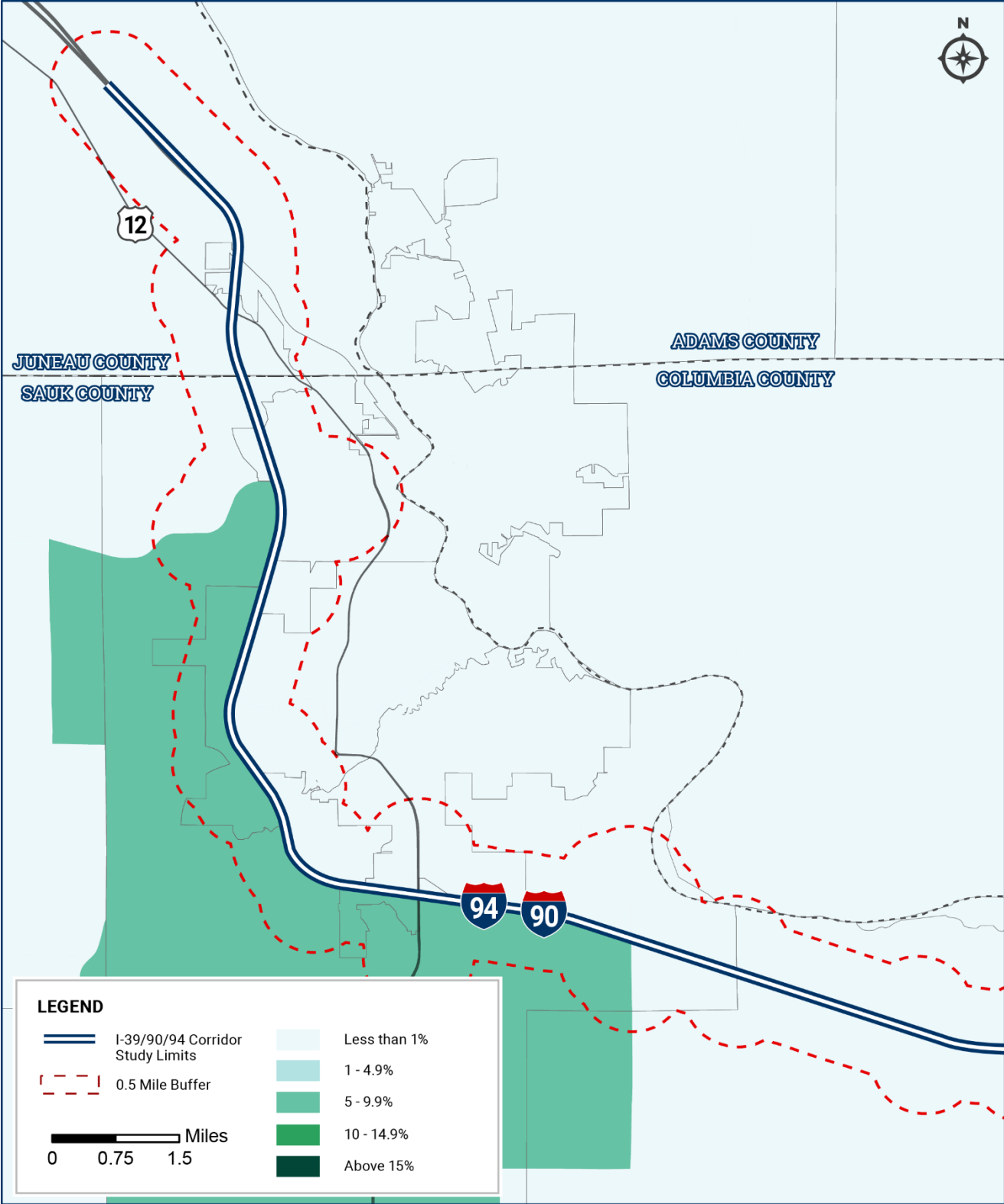
Source: US Census, 2021 ACS 5-Year (2017-2021) Block Group Level Data

Figure 10: Percent Hispanic Population within the One-half Mile Buffer – Wisconsin Dells



Source: US Census, 2021 ACS 5-Year (2017-2021) Block Group Level Data

Figure 11: Percent Asian Population within the One-half Mile Buffer – Wisconsin Dells



Source: US Census, 2021 ACS 5-Year (2017-2021) Block Group Level Data

6.3. Low-Income Population

The US Census 2017-2021 5-year ACS includes two indicators of low-income populations – median household income and poverty rates¹⁵. Using these two indicators, the study team accounted for low-income populations in the one-half mile analysis buffer. Data for low-income indicators is provided at the census tract level. The census tract is the smallest geographical unit for which income data is collected.

The EIS will work to evaluate several other indicators of low-income populations to supplement these two indicators. These supplemental indicators demonstrate characteristics of low-income populations without specifically accounting for income level or poverty. They include:

- o Families below poverty threshold
- o Household characteristics
- o Transportation
- o Persons with disabilities
- o Housing characteristics
- o Educational attainment

6.3.1. Median Household Income

Table 2 depicts median household income figures for the one-half mile analysis buffer area, Dane, Columbia, Sauk, and Juneau counties, and the State of Wisconsin. Median household income within the one-half mile analysis buffer is \$76,993, which is greater than the median household income for the State of Wisconsin by about \$10,000. Juneau County has the lowest median household income (\$58,561), which is about \$8,500 lower than the median household income in Wisconsin. Figure 12 illustrates the median household income in the one-half mile analysis buffer.

Table 2: Population Demographics - 2021 Median Household Income

	One-half Mile Analysis Buffer	Dane County	Columbia County	Sauk County	Juneau County	State of Wisconsin
Median Household Income	\$76,993	\$78,452	\$73,786	\$67,702	\$58,561	\$67,080

Source: US Census, 2021 ACS 5-Year (2017-2021) Data

¹⁵ HHS guidelines are a simplification of the US Census Bureau’s poverty thresholds for use for administrative purposes. Therefore, US Census Bureau 2021 poverty guidelines were used, in place of HHS poverty guidelines, to set the poverty threshold for this analysis. According to HHS, in 2021, a family of four would be considered in poverty if the family’s total income was less than \$26,500.

6.3.2. Poverty within the One-half Mile Analysis Buffer

In 2021, the US Census Bureau set the poverty threshold for an individual to a total income of less than \$13,788. The US Census Bureau also adjusts poverty thresholds based on household size, age of householder and number of related children. For example, in 2021, the poverty threshold for a family of four, with two related children under 18-years-old, was a total income of less than \$27,479.

Within the one-half mile analysis buffer, 3.8% of families are living with an income below the poverty threshold, which is 2.8% less than the percentage of families in poverty in the State of Wisconsin (6.6%). Juneau County has the highest family poverty rate of 8.5%, when compared with the other demographic areas quantified. Table 3 depicts the percentage of families living in poverty for the one-half mile analysis buffer, Dane, Columbia, Sauk, and Juneau counties, and the State of Wisconsin.

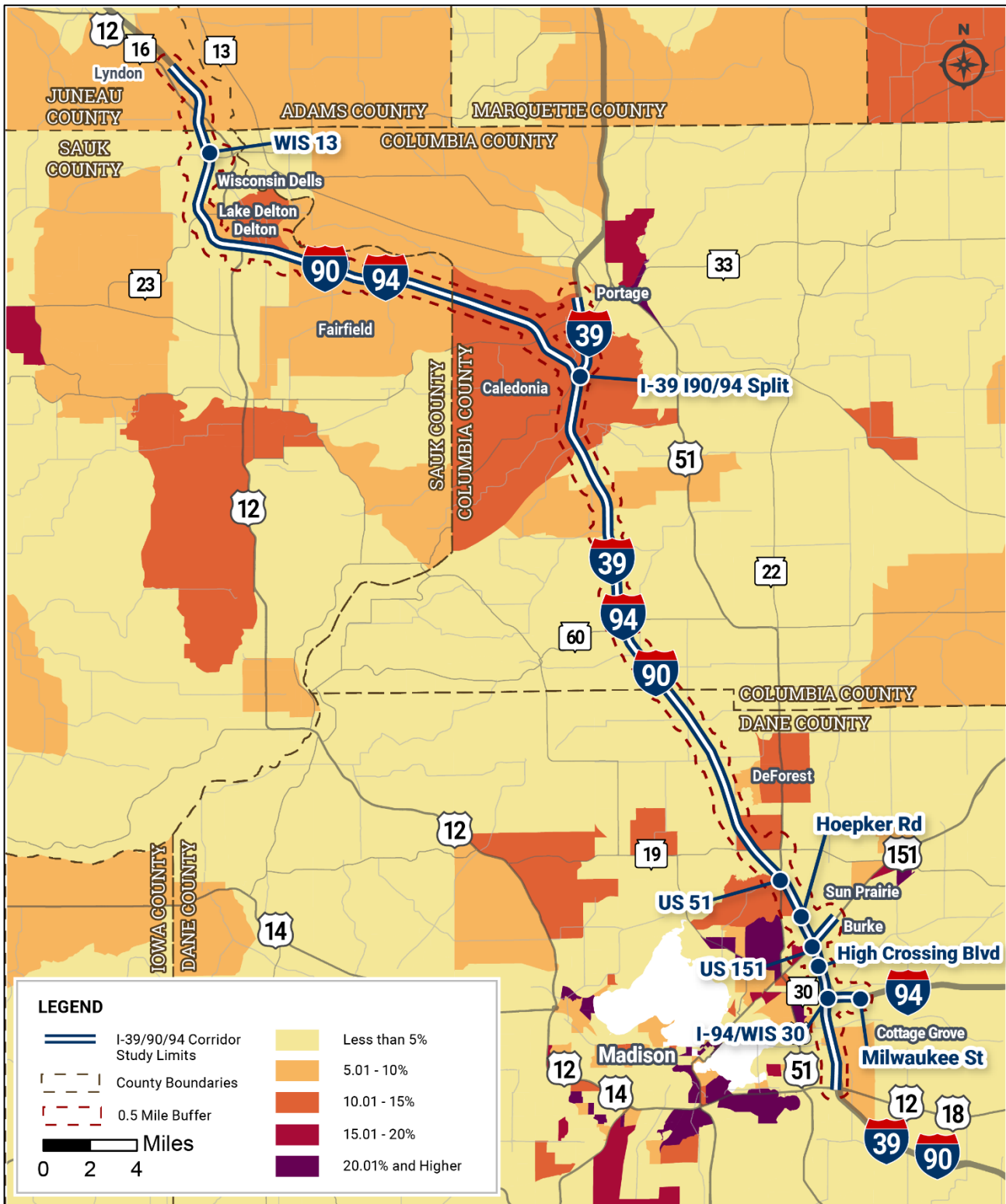
Spatial analysis of the individual poverty rate, as shown in Figure 13, illustrates where families below the poverty threshold are located within the vicinity of the one-half mile analysis buffer. Generally, the northern portions of the one-half mile analysis buffer and within the city of Madison have a greater percentage of families below the poverty threshold. The census blocks containing the greatest percentage of families in poverty (above 20% poverty) within study boundaries are near the city of Portage and to the west of the I-39/90/94 mainline near the city of Madison. The increase rate of poverty in and around the city of Madison also corresponds to the predominance of minority populations, as shown in Figure 4.

Table 3: Population Demographics - 2021 Families in Poverty

	One-half Mile Analysis Buffer		Dane County		Columbia County		Sauk County		Juneau County		State of Wisconsin	
	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%
Families	11,329	100.0	130,549	100.0	15,848	100.0	17,886	100.0	6,540	100.0	1,489,728	100.0
Families in Poverty	434	3.8	6,527	5.0	744	4.7	1,047	5.9	558	8.5	98,820	6.6

Source: US Census, 2021 ACS 5-Year (2017-2021) Data

Figure 13: Families Below Poverty Level



Source: US Census, 2021 ACS 5-Year (2017-2021) Block Group Level Data

7. Environmental Justice Outreach

I-39/90/94 Corridor Study outreach to environmental justice populations is intended to inform and solicit meaningful feedback from environmental justice populations regarding all aspects of the study. Outreach has begun and will continue throughout the duration of the study. Preliminary environmental justice groups and stakeholders have been identified, as shown in Table 5 and Table 6, and will be updated throughout the duration of the project. The study team will contact and arrange to meet with identified stakeholders to inform them of the study, solicit information and input on the study and to equip them with information regarding upcoming public involvement meetings and other opportunities to provide input about the study.

Study materials will be translated to include populations with limited English proficiency as appropriate. Appropriateness will be identified through preliminary coordination with the community organizations identified below, as well as others identified throughout project development. A breakdown of languages spoken within the one-half mile analysis buffer are identified in Table 4. Figure 14 identifies locations of Limited English Proficiency (LEP) populations.¹⁶

Table 4: Languages, Other than English, Spoken within the One-half Mile Analysis Buffer

Population	Count	Percent of Population
Spanish	685	1.44%
Indo European	147	0.31%
Asian Pacific Island	515	1.09%
Other	240	0.51%

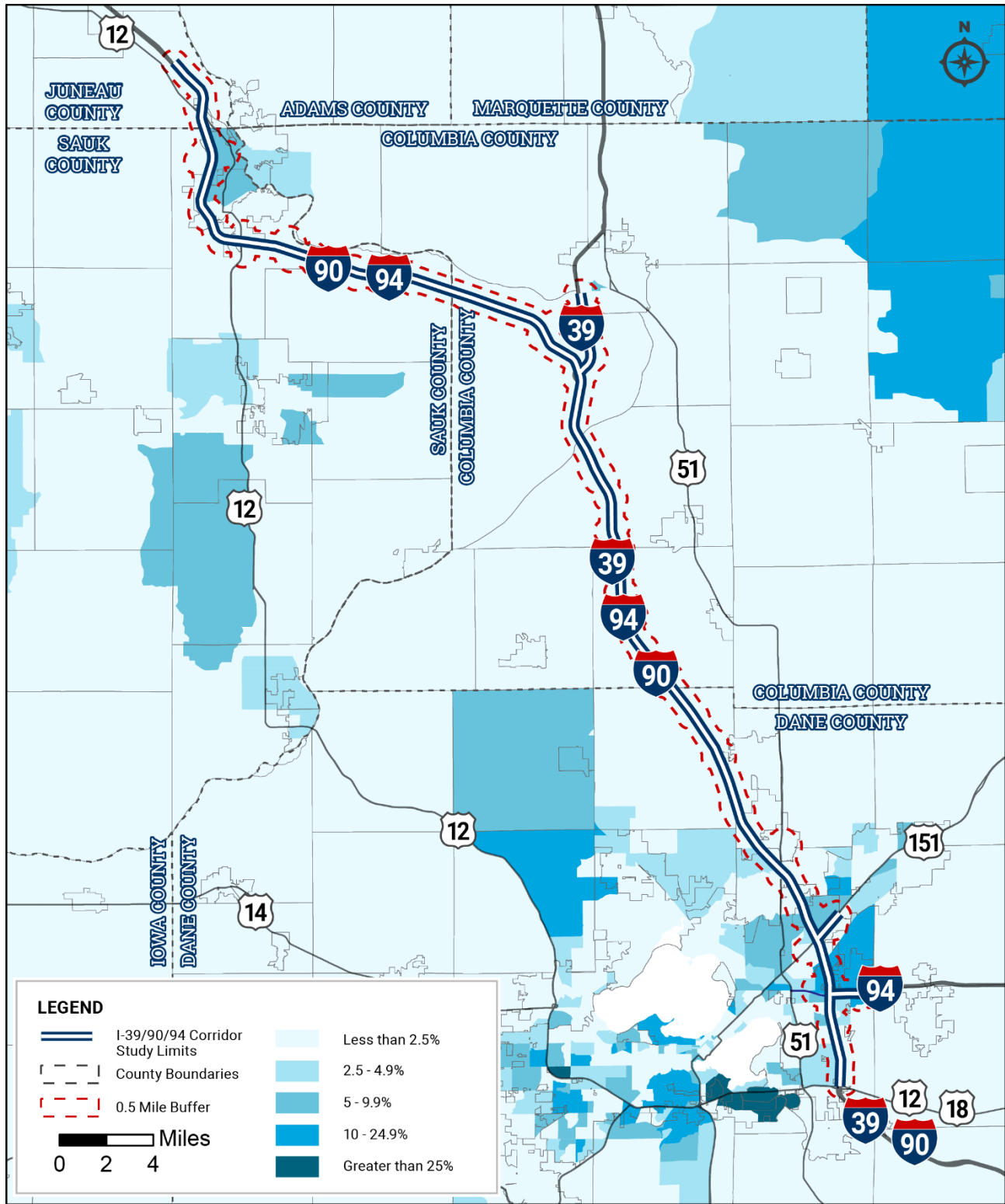
Source: US Census, 2021 ACS 5-Year (2017-2021) Data

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

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

¹⁶ Executive Order 13166

Figure 14: Limited English Proficiency (Population Who Speak English Less Than “Very Well”)



Source: US Census, 2021 ACS 5-Year (2017-2021) Block Group Level Data

Table 5: Community Organization & Neighborhood Association Outreach

Organization	Contact Name	Organization Address
Access To Independence, Inc.	Aceidna Yang	3810 Milwaukee St., Madison, WI 53714
African Association of Madison	Ray A. Kumapayi	P.O. Box 1016, Madison, WI 53701-1016
Area Agency on Aging – Dane County	--	2306 S Park St., Madison, WI 53713
Asian Wisconsin	Heidi Pascual	303 Whispering Pines Way, Fitchburg, WI 53713
Baraboo Acts Coalition	Marcy Huffaker	
Boys and Girls Clubs of Dane County	Tiffany Loomis	5215 Verona Road, Fitchburg, WI 53711
Catholic Charities	James Debilzen	702 S. High Point Rd., Madison, WI 53719
Catholic Multicultural Center	Andy Russell	1862 Beld St., Madison, WI 53713
Central Wisconsin Community Action Council	Fred Hebert	1000 Hwy. 13, P.O. Box 430, Wisconsin Dells, WI 53965
Centro Hispano-Madison	Karen Menendez Coller	810 W. Badger Rd., Madison, WI 53713
City of Madison Community Development Office	Jim O'Keefe	214 MLK Jr Blvd. 3rd Floor, Madison, WI 53703
City of Madison Department of Civil Rights	Norman D. Davis	210 MLK Jr Blvd. #523, Madison, WI 53703
Coalition of Wisconsin Aging Groups	Jean Erickson	210 MLK Jr. Blvd., Madison, WI 53703
Community Action Coalition for South Central Wisconsin	Meghan Mietchen	4101 E. Towne Boulevard, Madison, WI 53704
Community Support Network, Inc.	Caitlin C	1137 N. Sherman Ave., Madison, WI 53704
Dane County Housing Authority	Karyn Knaak	6000 Gisholt Dr #203, Monona, WI 53713
Dane County Veterans Service Office	Daniel Connery	1709 Aberg Ave. Suite 2, Madison, WI 53704
Early Childhood Initiative	--	1632 W. Main St. #4, Sun Prairie, WI 53590
East Madison - Monona Coalition of the Aging	--	4142 Monona Dr., Monona, WI 53716
East Madison Community Center	Veronica Castillo	8 Staubel Ct., Madison, WI 53704
Elder Care of Dane County, Inc.		2865 N. Sherman Ave., Madison, WI 53704
Family Support Resource Center	Heidi Rossiter	101 Nob Hill Rd. Suite 201, Madison, WI 53713
Goodman Community Center	Becky Steinhoff	149 Waubesa St., Madison, WI 53704
Ho-Chunk Housing & Community	Aryka Mrotek	975 Dyer St., Wisconsin Dells, WI 53965
Inspirational Care Madison, LLC	Adetoke Ogunnoiki	7105 Reston Heights Dr., Madison, WI 53718
Jewish Community Center	--	1301 Clara Ave., Wisconsin Dells, WI 53965
Jewish Social Services	Dawn Berney	6434 Enterprise Ln., Madison, WI 53719
Kilbourn Public Library/Community Center	Cathy Borck	620 Elm St., Wisconsin Dells, WI 53965
Latino Academy of Workforce Development	Carlos Arenas	1917 Lake Point Dr., Madison, WI 53713

Organization	Contact Name	Organization Address
Latino Chamber of Commerce of Dane County	Jessica Cavazos	810 W. Badger Rd., Madison, WI 53713
Madison Asian American Business Association	Aek Ksharty	5130 Door Dr., Madison, WI 53705
Madison Area Chinese Community Organization	--	23 Ellis Potter Court, Madison, WI 53713
Madison Black Chamber of Commerce	Camille Carter	2222 S. Park St. Suite 200, Madison, WI 53705
Madison Disability Rights & Services Program	Jason Glozier	210 MLK Jr. Blvd., Madison, WI 53703
Madison Housing Authority	Suzy Stapleton	215 MLK Jr Blvd. #161, Madison, WI 53703
Madison Senior Center	Christine Beatty	330 W. Mifflin St., Madison, WI 53703
Marshall Memorial Hall	--	30 Wisconsin Dells Pkwy. S., Wisconsin Dells, WI
Meister Special Care Transport	Ron Meister	2330 Vondron Rd., Madison, WI 53718
Ohr Yehudah Chadbad	Rabbi Yona Matusof	409 Broadway Ave., Wisconsin Dells, WI 53965
Philippine-American Association of Madison	--	PO Box 5013, Madison, WI 53705
Project Home - Madison	Denise Matyka	1966 S. Stoughton Rd., Madison, WI 53714
REM Wisconsin III, Inc.	Amy Tikkanen	1115 W. Pleasant St. Suite 3, Portage, WI 53901
REM Wisconsin III, Inc.	Veronica Brown	2005 W. Beltline Hwy., Madison, WI 53713
SOPORT	Wayne Houston	615 N. Sherman Ave., Madison, WI 53704
Sunshine Place	Ann Maastricht	18 Rickel Rd., Sun Prairie, WI 53590
Teamwork Associates, Inc.	Beth Hougen	822 Gannon Ave., Madison, WI 53714
The Salvation Army	Melissa Sorensen	630 East Washington Ave., Madison, WI 53701
United Refugee Services of Wisconsin, Inc.	Koua Vang	2132 Fordem Ave., Madison, WI 53704
United Way of Dane County	Karen Soraya Burch	2059 Atwood Ave., Madison, WI 53704
Upham Woods Outdoor Learning Center	Johanna Desprez	N194 County Road N, Wisconsin Dells, WI 53965
Urban League of Greater Madison (ULCM)	Dr. Ruben Anthony	2222 S. Park St. Suite 200, Madison, WI 53705
UW Health East Madison Hospital	Juli Aulik	4602 Eastpark Blvd., Madison, WI
Vera Court Neighborhood Center	Thomas Solyst	614 Vera Ct., Madison, WI 53704
Wisconsin Council of the Blind and Visually Impaired	Bob Jacobson	754 Williamson St., Madison, WI 53703
YMCA Madison	Vanessa McDowell	101 E. Mifflin St., Madison, WI 53703
Wisconsin Family Based Service Association	--	511 E. Adams St., Wisconsin Dells, WI 53965
A Generations Project	--	6309 Saturn Dr., Madison, WI 53718

Table 6: Neighborhood Outreach

Neighborhood Association	Contact Name
Burke Heights Neighborhood Association	Kerry McAllen
	Jessi Alter
Greater Sanburg Neighborhood Association	Kate Pinkston
	Nick Petrulis
North Star Neighborhood Association	Barbara Davis
	Kathryn Premo Mingione
Ridgewood Neighborhood Association	Bob Schaefer
Sprecher East Neighborhood Association	Dave Lytle
	Rik Berghammer

8. Environmental Justice Staff Resources

Table 7 lists the individuals involved with implementing the Environmental Justice Analysis Plan and Preliminary Analysis for the I-39/90/94 Corridor Study:

Table 7: Environmental Justice Staff Resources

Agency	Name	
HNTB	Nick Bennett	Project Manager
HNTB	James Robinette	Deputy Project Manger
HNTB	Caron Kloser	Environmental Lead
De Vor Communications, LLC	Darci Hackbarth	Public Involvement Lead
WisDOT	Dan Schave	Southwest Region Director
WisDOT	Jim Oettinger	Southwest Region PDS Chief
WisDOT	Jennifer Kobryn	Southwest Region PDS Supervisor
WisDOT	David Schmidt	Southwest Region PDS Study Manager
WisDOT	Franco Marcos	Southwest Region PDS Planner
WisDOT	Michael Bie	Southwest Region Communications Manager
WisDOT	Brian Taylor	Southwest Region Environmental Coordinator
WisDOT	Mike Helmrick	BTS Environmental Coordinator

9. Timelines, Activities and Deliverables

Findings in this preliminary assessment will inform the decision-making process in considering potential effects of the identified alternatives and inform the project study team of community issues and concerns. Initial deliverables drawn from the assessment include, but are not limited to, the deliverables shown in Table 8:

Table 8: Timeline, Activities and Deliverables

Task	Description/Objective	Timeline
Citizen Advisory Committee Meeting No. 1	Introduce the Study and the Study team, provide a status update, solicit feedback from the Citizen Advisory Committee and discuss upcoming activities	August 2022 and ongoing updates to the Citizen Advisory Committee
Local Officials Meeting No. 1	Introduce the Study and the Study team, provide a status update and discuss upcoming activities. public involvement meeting No. 1 preview	September 13 and 14, 2022
Public Involvement Meeting No. 1	Introduce the Study and the Study team, provide a status update, solicit feedback from stakeholders and discuss upcoming activities	September 13 and 14, 2022
Local Officials Meeting No. 2	Introduce the Study and the Study team, provide a status update and discuss upcoming activities. Public involvement meeting No. 2 preview	April 6, 2023
Public Involvement Meeting No. 2	Provide a status update, solicit feedback from stakeholders and discuss upcoming activities	April 12 and 13, 2023
Local Officials Meeting No. 3	Provide a status update, identify preferred alternative and discuss upcoming activities. Public involvement meeting No. 3 preview	January 23, 2023
Public Involvement Meeting No. 3	Provide a status update, identify preferred alternative and solicit feedback from stakeholders and discuss upcoming activities	January 30, 31 and February 1, 2024
Public Hearing	Opportunity for the public to provide comment and testimony on the Draft EIS to a panel before all attendees or privately to a court reporter	Summer 2024

10. Tentative Methods of Evaluation of Environmental Justice Analysis Effectiveness

- o Conduct periodic checks of the current project status against established deliverables listed in Section 9.
- o Conduct surveys with the public at various times, using diverse types of outreach meetings, small group meetings and online.
- o Develop clear, measurable goals for the number of meetings, number of stakeholders added to mailing list, number of inquiries and response to inquiries.
- o Incorporate comments and requests from minority and low-income advisory committee participants and neighborhood meetings into the development of the project and proposed project alternative.