Docusign Envelope ID: CC827560-6F4B-8454-82E1-AC3BAFA79957

INFORMATION FOR RE-EVALUATION OF ENVIRONMENTAL DOCUMENT VALIDITY

Wisconsin Department of Transportation
12/2025

PROJECT ID: 1130-63-01
PROJECT NAME: Interstate 41 (I-41)
PROJECT TERMINI: WIS 96 Interchange to County F Interchange

ORIGINAL PROJECT ID (if different from ID above): 1130-63-00

STATE OF WISCONSIN
DEPARTMENT OF TRANSPORTATION

DocuSigned by:
Kurt Peters
FCF5B3D3677F4B4...

Kurt Peters, PDS Manager — September 21, 2026 Date

DocuSigned by:
Barry Paye
3F13953827A84D7...

Barry Paye, Bureau of Technical Services Director — September 21, 2026 Date

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL HIGHWAY ADMINISTRATION

Wisconsin Division

DocuSigned by:
Lisa Hemesath
350B49535D004A1...

Lisa Hemesath, Environmental Program/Project Specialist — September 21, 2026 Date

1. PURPOSE OF THIS RE-EVALUATION

This re-evaluation has been prepared in accordance with the requirements of the following documents as applicable; Federal Highway Administration Environmental Impact and Related Procedures 23 CFR 771; Federal Highway Administration Technical Advisory T 6640.8A; the Wisconsin Environmental Policy Act; Wisconsin Administrative Code Chapter Trans 400 and the policy of WisDOT to evaluate the status of a project's environmental documentation prior to authorization of each major project development step.

Elements considered in the re-evaluation are:

- Changes in scope, design of the project or funding
- Changes in laws, rules, codes
- Changes to the existing environment
- Changes to project impacts and mitigation

Before beginning preparation of this re-evaluation document, consultation must occur between the preparer, the Region Environmental Coordinator, the Environmental Process and Documentation Section liaison and FHWA (if federal funding or a federal action is involved) to ensure a re-evaluation is applicable, and is so, what information should be included and the level of public involvement required.

Has this consultation occurred? ☒ Yes ☐No

2. ORIGINAL ENVIRONMENTAL DOCUMENT TYPE AND PROJECT TERMINI

☐ Draft ER ☐ Final ER ☒ EA ☒ FONSI ☐ Draft EIS ☐ Final EIS ☐ ROD ☐ Latest Re-evaluation

☐ Other, describe:

Approval Date of Original Environmental Document: 11/18/2021

Approval Date(s) of Previous Re-evaluation(s): 11/14/2023, 2/16/2024

Termini of Original Environmental Document: WIS 96 Interchange to County F Interchange (See **Figure 1**)

Termini of This Re-evaluation (Study Area): WIS 96 Interchange to County F Interchange – no change to original termini

Original Environmental Document and Subsequent Re-evaluations

The I-41 Project (Project) proposes to address safety and operational issues along a portion of I-41 in Brown and Outagamie Counties. Currently, the 23-mile section of I-41 between WIS 96 in Outagamie County and County F in Brown County is congested, has multiple geometric and operational deficiencies and the infrastructure is reaching the end of its useful life. An environmental assessment (EA) was prepared for the Project and a finding of no significant impact (FONSI) was issued in 2021, which selected the 6-lane modernization alternative. This document re-evaluates the 2021 EA/FONSI because progress on final design activities has changed impacts previously reported. The scope of the Project has not changed since the 2021 EA/FONSI. **Figure 1** shows the project area, project limits and the interchanges that are included in the project scope, and **Figure 2** shows the relationship between the project area and the Brown County South Bridge Connector project (see **Prior Scope** section below for details).

WisDOT completed a re-evaluation and Environmental Impact Update Memo on November 14, 2023 (2023 Re-evaluation). The 2023 Re-evaluation documented Endangered Species Act (ESA) consultation with the US Fish and Wildlife Service (USFWS) for the Northern Long-Eared Bat (NLEB) and Tricolored Bat (TCB) and addressed the reclassification of NLEB from threatened to endangered as well as the proposed listing of the TCB as endangered. It also identified avoidance and minimization measures required due to the updated USFWS consultation on the project corridor, consistent with WisDOT Facilities Development Manual (FDM) chapter 20-40 and 23 Code of Federal Regulations (CFR) 771.129.

On February 16, 2024, WisDOT completed another re-evaluation for the Project (2024 Re-evaluation), using the Information for Re-evaluation of Environmental Document Validity template. The 2024 Re-evaluation described changes in the project design, impacts and environmental commitments since the 2021 EA/FONSI based on the project advancing further in the design process. Design changes affected the I-41 mainline and auxiliary lanes, slopes and grading, bridges and culverts, drainage and stormwater facilities, interchanges and other project elements.

The 2021 EA/FONSI and the most recent (2024) Re-evaluation are available on the project website under the Resources Section: https://i41project.wisconsindot.gov/.

This re-evaluation (2026 Re-evaluation) describes changes in design, impacts and environmental commitments for the Project since the approval of the 2021 EA/FONSI that were not evaluated in the 2023 or 2024 Re-evaluations.

3. PROPOSED ACTION	YES	NO
Have there been any changes to the following since the approval of the original environmental document:		
• The project scope?	☐	☒
• The project design?	☒	☐
• The project funding sources?	☐	☒
• The project delivery or construction schedule?	☒	☐

Describe changes:

Prior Scope

The project scope described in the 2021 EA/FONSI included reconstructing approximately 23 miles of I-41 and nine existing interchanges along the corridor, constructing one new interchange at Southbridge Road and improving WIS 441 from the I-41 system interchange to County OO. Along I-41, the Project included reconstructing the existing four-lane facility to six lanes with three 12-foot travel lanes in each direction, 12-foot inside and outside shoulders and a concrete median barrier. Auxiliary lanes and collector-distributer roads were proposed where warranted along with improvements to drainage and stormwater management facilities and adding new noise barriers. The Project included reconstructing the Wrightstown Safety and Weight Enforcement Facility (SWEF), constructing a new Outagamie County salt shed and resurfacing three WisDOT park-and-ride lots. The 2024 Re-evaluation included the addition of a southbound auxiliary lane from Capitol Drive to Lynndale Drive along Rifle Range Road that was not included in the 2021 EA/FONSI.

The Project also served as the tier 2 environmental analysis and NEPA documentation for a section of the Brown County South Bridge Connector (SBC) from the County F/County EB intersection on the west to Lawrence Drive on the east, including the new I-41/Southbridge Road interchange. WisDOT obtained a permit for stream and wetland impacts for the new interchange and I-41 mainline, and Brown County obtained a permit for stream and wetland impacts for the sections of South Bridge Road east and west of the interchange. Brown County is responsible for ongoing construction of the sections of South Bridge Road east and west of the interchange. A tier 1 EIS was approved for the SBC on October 16, 2020, and separate tier 2 environmental analyses for other sections of the SBC are being led by either Brown County or WisDOT.

Changes in this Re-evaluation

No changes to the project scope are proposed under this 2026 Re-evaluation. The primary focus of this Re-evaluation is additional analysis and coordination for the construction of a salt shed for the Outagamie County Highway Department at 1313 Holland Road in Appleton. While the salt shed was included in the project scope described in the 2021 EA/FONSI, further progress in final design and construction resulted in the need for updated analysis and coordination, specifically for wetland impacts and National Historic Preservation Act (NHPA) Section 106 compliance. This Re-evaluation also describes routine updates in coordination, impact analysis and mitigation commitments for several other resources, reflecting updates since the 2021 EA/FONSI and the 2023 and 2024 Re-evaluations. The topics addressed in this Re-evaluation are listed below and described in further detail in the corresponding sections of the re-evaluation template.

- Updated impact analysis and coordination for the Outagamie County salt shed
- Updated consultation and commitments for state and federal threatened and endangered species and migratory birds
- Updated wetland and waterway impacts (including SBC sections under the permit obtained by Brown County)
- Updated permits
- Stakeholder coordination on community sensitive design (CSD) features
- A minor update to WisDOT's noise policy and design changes considered for three proposed noise walls
- Public and business outreach regarding pedestrian access at the WIS 47 interchange during construction
- Coordination with the Outagamie County Drainage Board regarding project impacts
- Design and impact analysis for proposed grading at Little Chute Pond System (requested by Town of Little Chute)

This 2026 Re-evaluation will focus on the environmental consequences of changes that have occurred since the 2024 Re-evaluation, but the 2023 and 2024 Re-evaluations may be referenced as necessary for details on other changes to the project design, impacts, affected environment and applicable requirements since the 2021 EA/FONSI.

The 2021 EA/FONSI projected the start of construction in 2025, and construction is now underway, though some construction activities commenced in fall 2024. Since the completion of the 2021 EA/FONSI and the 2023 and 2024 Re-evaluations, WisDOT has developed a more detailed construction schedule which is posted on the project website. The construction schedule generally shows construction activity occurring throughout the project corridor from fall 2024 through the end of 2029, and detailed maps and schedules are available for planned 2026 and 2027 construction activities.

The total project cost estimate in the 2021 EA/FONSI was $1.25 billion in 2024 dollars, and the current project cost is estimated at $1.25 billion in the year of expenditure (through the end of 2029) based on the March 2026 Project Financial Plan Update completed by WisDOT.

4. PURPOSE AND NEED	**YES**	**NO**
Have there been any changes to the project purpose and need since the approval of the original environmental document including changes or updates to underlying analyses such as traffic data, crash data or infrastructure condition?	☐	☒

Briefly describe the purpose and need in the original approved document:

The purpose of the of the Project included in the 2021 EA/FONSI is to provide a safe, reliable highway that meets interstate standards and addresses existing safety and operational deficiencies. In addition, the purpose of the project addresses the outdated SWEF to allow it to operate effectively with proposed improvements to I-41.

The need for transportation improvements on I-41 is based on a combination of the following factors:

- **Safety**: high crash rates
- **Capacity**: Existing and future traffic operations
- **Roadway Deficiencies**: pavement condition, bridge condition, and roadway design deficiencies
- **System Linkage**
- **Outdated SWEF**

If 'YES' is checked, describe the changes or updates:

The 2024 Re-evaluation included updates to traffic and crash data since the 2021 EA/FONSI, but the overall purpose and need factors remain unchanged, and no changes to the purpose and need factors have occurred since the 2024 Re-evaluation. The original and updated data detailing the project needs can be viewed in the environmental documents posted on the project website.

5. AFFECTED ENVIRONMENT & ENVIRONMENTAL CONSEQUENCES

Identify if there have been any changes in the affected environment or project impacts from those identified in the original approved environmental document. For each 'YES', describe the change and include a statement regarding whether or not the change will result in a new significant impact not identified in the original document. If the change results in a new significant impact, supplemental or new environmental documentation is required. Include any supporting analysis, studies or comparison maps as an attachment to this document. Summarize all changes on the Re-evaluation Impact Comparison Matrix and indicate any changes to commitments on the Updated Environmental Commitments Document. If the resource is not present in the study area, put an "X" in the "NO" box and no further information is needed.

A. Affected Environment Changes	**YES**	**NO**
Have there been any changes in the affected environment within or adjacent to the project area that could affect any impact categories (e.g. transportation infrastructure, protected resources, land use plans, etc.)?	☒	☐

Describe changes:

Changes to the affected environment are minimal and relate primarily to recently updated ranges for two species in the project area. USFWS updated the rusty patched bumblebee (*Bombus affinis*) (RPBB) high potential zone (HPZ) in March 2025, May 2025 and March 2026. The March 2025 revision to the HPZ added a 3-mile section of overlap between the project area and the HPZ and the May 2025 revision added an additional 1.2 miles of overlap. The March 2026 revision resulted in no changes to the HPZ within the project area. Prior to the March and May 2025 updates,

USFWS had not identified the HPZ within the project area, and the USFWS biological opinion (BO) from January 17, 2024, did not address the RPBB. On July 14, 2025, USFWS updated the range of the eastern prairie fringed orchid (*Platanthera leucophaea*) (EPFO) with an extent similar to the updated RPBB HPZ described above. WisDOT amended their consultation with USFWS in April and September 2025 to account for these changes, and USFWS concurred in a "May Affect, Not Likely to Adversely Affect" determination for RPBB and EPFO based on the updated information. USFWS concurred that impacts to the RPBB are considered discountable because much of the corridor is poor nesting habitat, low-quality foraging habitat or had been disturbed prior to the nesting season, deterring the species from being present during construction. Similarly, USFWS concurred that impacts to the EPFO were discountable since the corridor is heavily disturbed by the original highway construction making it unsuitable habitat. See Section N for additional details on updated analyses and consultation for state and federal threatened and endangered species since the 2021 EA/FONSI and subsequent re-evaluations. This change does not result in a new significant impact that was not identified in the 2021 EA/FONSI or subsequent re-evaluations.

B. Law, Regulation and Policy Changes	YES	NO
Have there been any changes to laws, regulations and policies that could affect any impact categories?	☒	☐

Describe changes:

On August 15, 2024, WisDOT updated their policy related to funding source eligibility of CSD elements.

On November 26, 2024, USFWS announced a proposal to designate critical habitat for the federally endangered RPBB. If critical habitat is designated, WisDOT will resolve ESA compliance prior to let, as appropriate. Construction activities for this project will not take place until WisDOT, in coordination with FHWA, satisfies ESA compliance for the RPBB critical habitat.

On December 12, 2024, USFWS proposed to list the monarch butterfly (*Danaus plexippus*) as a threatened species and designate critical habitat for the species under Section 4(d) of the ESA. Once the butterfly is listed, WisDOT will request that the conference opinion issued with the January 17, 2024, Biological Opinion be adopted by USFWS to satisfy ESA Section 7 compliance.

On January 20, 2025, President Trump signed Executive Order (E.O.) 14148 – Initial Rescissions of Harmful Executive Orders and Actions and E.O. 14154 – Unleashing American Energy. These E.O.s revoked E.O. 14096 – Revitalizing Our Nation's Commitment to Environmental Justice for All (April 21, 2023). Subsequently on January 21, 2025, President Trump signed E.O. 14173 – Ending Illegal Discrimination and Restoring Merit-Based Opportunity. This E.O. revoked E.O. 12898 – Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (February 11, 1994). On February 25, 2025, the Council on Environmental Quality (CEQ) published an Interim Final Rule removing the CEQ's National Environmental Policy Act (NEPA) implementing regulations, effective April 11, 2025 (90 FR 10610). On January 8, 2026, CEQ published a Final Rule, effective upon publication, adopting the interim final rule without changes (91 FR 618). As a result of these actions, all federal environmental justice requirements and CEQ's NEPA regulations are revoked and no longer apply to the federal environmental review process. The Federal Highway Administration (FHWA), Federal Transit Administration (FTA) and Federal Railroad Administration (FRA) joint NEPA regulations (23 CFR part 771) and the agencies' Interim Final Guidance, titled "Section 139 Environmental Review Process: Efficient Environmental Reviews for Project Decision making and One Federal Decision" (December 17, 2024) do not require an environmental justice analysis.

On March 19, 2025, May 12, 2025, and March 26, 2026, USFWS updated the RPBB high potential zones, indicating where the presence of the species should be presumed for ESA Section 7 purposes.

On April 11, 2025, USFWS released memorandum M-37085 to implement E.O. 14154 which restored previously vacated memorandum M-37050, which concluded that the prohibitions of the Migratory Bird Treaty Act do not apply to the accidental or incidental taking or killing of migratory birds.

In June 2025, the Wisconsin Department of Natural Resources (WDNR) and U.S. Army Corps of Engineers (USACE) release their Wisconsin Mitigation Guidelines Version 2 for wetland mitigation, which WisDOT subsequently incorporated in an August, 5, 2025, update to the WisDOT/WDNR Cooperative Agreement Wetland Mitigation Attachment. The Version 2 guidelines updated wetland types and mitigation ratios.

On July 3, 2025, FHWA, FTA and FRA published an interim final rule to modify their joint NEPA regulations (23 CFR 771) to be consistent with the removal of NEPA regulations previously issued by CEQ, the amendments to NEPA included in the Fiscal Responsibility Act of 2023 and amendments regarding efficient environmental reviews included in the Infrastructure Investment and Jobs Act of 2021.

On July 14, 2025, USFWS updated the range of the EPFO.

On August 15, 2025, WisDOT adjusted the noise barrier reasonableness threshold in their noise policy, consistent with their practice of periodically reviewing and adjusting the reasonableness criteria based on actual costs to construct noise barriers.

On June 1, 2026, USFWS published a final rule designating critical habitat for the RPBB, effective on July 1, 2026. The I-41 Project does not overlap the RPBB critical habitat.

The 2024 Re-evaluation summarized other law, regulation and policy changes that occurred since the 2021 EA/FONSI. This 2026 Re-evaluation summarizes new changes since the approval of the 2024 Re-evaluation. None of these changes resulted in a new significant impact that was not identified in the 2021 EA/FONSI or subsequent re-evaluations.

C. Land Use, Transportation and Other Plans

	YES	NO
Have there been any changes to the following since the approval of the original environmental document:		
• The State Transportation Improvement Program or other state plans?	☒	☐
• The Regional Land Use Plan, Region Transportation Plan, Transportation Improvement Program?	☒	☐
• Local land use or transportation plan(s)?	☒	☐
• The potential for the project to have reasonably foreseeable effects on land use or transportation facilities?	☐	☒

Describe changes:

The 2021 EA/FONSI determined that implementing the Project was consistent with state, regional and local plans. In the 2024 Re-evaluation, state, regional and local plans were reviewed for changes made after the 2021 EA/FONSI, which resulted in a determination that the proposed design remained consistent with the plans. For this 2026 Re-evaluation, the plans were reviewed again, revealing that a majority of the plans reviewed for the 2021 EA/FONSI have an update underway or complete. Changes since the versions originally reviewed are noted below in **Table 1** along with comments on project consistency with those plans. Based on this review, the Project remains consistent with statewide, regional and local plans. None of the changes to the plans resulted in a new significant impact that was not identified in the 2021 EA/FONSI or subsequent re-evaluations, and no changes to future land use or reasonably foreseeable effects are anticipated.

Table 1: Status of State, Regional and Local Plans and Project Consistency with Plans

Name of Plan	Update Status	Comments on Consistency
WisDOT Statewide Transportation Improvement Program	Original: 2021-2024 Updated: 2025-2028	The project remains listed in the most recent version of the program with multiple entries for utility and construction activities as IH 041 Appleton – De Pere with project IDs 1130-63-xx, -64-xx, -65-xx, -66-xx and -67-xx.
Appleton/Fox Cities Metropolitan Planning Organization Transportation Improvement Program	Original: 2021-2024 Updated: 2025-2028	The project remains in the most recent version of the program with multiple entries for construction activities as IH 41 Expansion, Appleton – De Pere with project ID 252-22-052.
Transportation Improvement Program for the Green Bay Metropolitan Planning Area	Original: 2022-2025 Updated: 2025-2028	The project remains in the most recent version of the program with multiple entries for construction activities as I-41 Expansion with project IDs 158-21-014, -015, -027 and -028.
Green Bay Metropolitan Planning Organization 2045 Long-Range	Original: 2045 Updated: 2055 (October 2025)	The plan identifies the I-41 expansion project from Scheuring Road in De Pere to WIS 96 in Appleton,

Transportation Plan		including the new Southbridge Road interchange and addition of I-41 travel lanes, as part of the future transportation system.
East Central Wisconsin Regional Comprehensive Plan 2030 (2008)	2045 update underway	The plan specifies that WisDOT and the Metropolitan Planning Organization (MPO) should plan to expand the capacity of I-41 from four to six lanes from Appleton to Green Bay. The plan mentions high crash rates along the roadway.
Outagamie County Comprehensive Plan 2040 (2020)	No update completed	Implementation of the I-41 project is consistent with this plan.
Outagamie County Farmland Preservation Plan	Original: 2011 Updated: 2023-2033	The plan documents that I-41 improvements will make traveling into Outagamie County more accessible and provide efficiencies in distribution of agricultural goods and services.
Outagamie County Outdoor Recreation and Open Space Plan	Original: 2014-2018 Updated and replaced by Comprehensive Outdoor Recreation Plan (2022-2026); 2027-2031 update underway	Implementation of the I-41 project is consistent with this plan.
Brown County Comprehensive Plan	Original: 2007 Updated: 2023 (2040 horizon)	The plan identifies the new I-41 interchange as part of the South Bridge Connector Project. Implementation of the I-41 project is consistent with this plan.
2040 Brown County Sewage Plan (2015)	No update completed	Implementation of the I-41 project is consistent with this plan.
2017-2027 Brown County, WI Farmland Preservation Plan Update	No update completed	Implementation of the I-41 project is consistent with this plan.
Brown County Parks and Outdoor Recreation Plan	Original: 2017-2022 Updated and replaced by Comprehensive Outdoor Recreation Plan 2023-2028	Implementation of the I-41 project is consistent with this plan.
Fox Cities 2030 Sewer Service Area Plan Update	Original: 2006 (2030 horizon) Updated: 2023 (2040 horizon)	Implementation of the I-41 project is consistent with this plan.
Town of Grand Chute Comprehensive Plan	Original: 2010-2030 Updated: 2022-2042	The plan documents the need for continued collaboration with WisDOT to implement the I-41 corridor reconstruction project.
Town of Grand Chute Comprehensive Outdoor Recreation Strategy	Original: 2018 Updated and replaced by Comprehensive Outdoor Recreation Plan 2024-2028	Implementation of the I-41 project is consistent with this plan.
City of Appleton Comprehensive Plan 2010-2030	Original: 2010-2030 Updated and replaced by Plan Appleton (December 2025)	Implementation of the I-41 project is consistent with this plan.
City of Appleton Comprehensive Outdoor Recreation Plan 2019-2023	Original: 2019-2023 Update: 2025-2030 (December 2025)	Implementation of the I-41 project is consistent with this plan.
Village of Little Chute Comprehensive Plan 2016-2036	No update completed	Implementation of the I-41 project is consistent with this plan.
Village of Little Chute Comprehensive Outdoor Recreation Plan	Original: 2016 Updated: 2022-2026	Implementation of the I-41 project is consistent with this plan.
City of Kaukauna Comprehensive Plan (2013)	No update completed	Implementation of the I-41 project is consistent with this plan.
City of Kaukauna Recreation and Open Space Master Plan 2019-2024	Original: 2019-2024 Updated and replaced by 2025-2030 Comprehensive Outdoor Recreation Plan	Implementation of the I-41 project is consistent with this plan.
Village of Wrightstown Comprehensive Plan (2016)	No update completed 2025 update underway	Implementation of the I-41 project is consistent with this plan.
2018 Town of Wrightstown Comprehensive Plan Update	No update completed	Implementation of the I-41 project is consistent with this plan.
Town of Lawrence Comprehensive Plan	Original: 2016 Updated: 2024	Implementation of the I-41 project is consistent with this plan.
Town of Lawrence Parks & Outdoor Recreation Plan (an element of the Comprehensive Plan)	Original: 2016 Updated: 2024	Implementation of the I-41 project is consistent with this plan.
City of De Pere 2010 Comprehensive Plan Update	No update completed 2025 update underway	Implementation of the I-41 project is consistent with this plan.

City of De Pere Comprehensive Outdoor Recreation Plan	Original: 2018-2023 Updated: 2024-2029	Implementation of the I-41 project is consistent with this plan.

D. Right of Way Changes

	YES	NO
Have there been any changes to the following since the approval of the original environmental document:		
• The right of way requirements for the project (in final design or construction)?	☒	☐

Describe changes or any right of way that has already been acquired:

The 2024 Re-evaluation described an increase in the planned right of way taking for the project from the approximately 93 acres originally included in the 2021 EA/FONSI to 131.5 acres. The increased taking resulted from progress in final design and design modifications at intersections and interchanges requested by local municipalities.

For this 2026 Re-evaluation, the estimated right of way taking decreased relative to the 2024 Re-evaluation with current totals as follows:

- Fee: 87.9 acres
- Temporary Limited Easement (TLE): 12.9 acres
- Permanent Limited Easement (PLE): 2.2 acres
- Total area permanently converted (Fee + PLE): 90.1 acres

Factors contributing to the decrease include continued design progress resulting in narrowed strip takings throughout the corridor, and the possible inclusion of TLE in the right of way total reported in the 2024 Re-evaluation. The current project design, existing right of way, new right of way and easements are shown in **Appendix A**. There have been no substantive changes to these factors since the 2024 Re-evaluation that have the potential to result in a new significant impact not already evaluated in the 2021 EA/FONSI or subsequent re-evaluations.

E. Social and Cultural Impacts

	YES	NO
Have there been any changes to the following since the approval of the original environmental document:		
• The number of residential acquisitions/relocations required?	☐	☒
• The project's effect on neighborhoods or community cohesion?	☐	☒
• The project's effect on travel patterns and accessibility (e.g., vehicular, commuter, bicycle or pedestrian)?	☐	☒
• The project's effect on schools, recreation areas, churches, businesses, police and fire protection, etc.?	☒	☐
• The project's effects on the elderly, handicapped, non-drivers or transit-dependent?	☐	☒
• Has the U.S. Census been updated?	☒	☐
• Unresolved project issues or concerns of an Indian Tribe?	☐	☒

Describe changes for each 'YES' above including any acquisitions that have already occurred:

The 2024 Re-evaluation provided status updates and described minor changes to residential acquisition/relocations, temporary construction impacts to travel patterns, an impact to a recreational trail/parkland parcel, new U.S. Census data and updated coordination with American Indian Tribes. Refer to Section F. Demographics Impacts for additional details on the Census updates.

During spring 2025, WisDOT conducted additional analysis with pedestrian counts and coordination with residents and businesses near the WIS 47/Richmond Street interchange specific to the impacts of closing WIS 47 to pedestrians and vehicles beginning in spring 2026 for construction of a new diverging diamond interchange. On May 21, 2025, WisDOT sent a letter to affected residents and businesses seeking feedback on the closure and alerting recipients to an existing alternate route approximately 2 miles in length using Capitol Drive, Gillett Street and Evergreen Drive. Business owners and employees who were contacted indicated a generally low level of concern about potential impacts to nonmotorized users, with many noting the importance of being able to communicate with their customers about alternate routes prior to and during construction. WisDOT will continue coordination with residents, businesses, local officials, first responders and other key stakeholders on access changes and alternate routes at WIS 47 and other areas of the Project as construction proceeds.

In early 2026, WisDOT circulated an amended tribal notification with minor updates to the Project's area of potential effects (APE); no tribes replied. See Section H below for additional details on updates to historic and archaeological resources.

There have been no substantive changes to these factors since the 2024 Re-evaluation that have the potential to result in a new significant impact not already evaluated in the 2021 EA/FONSI or subsequent re-evaluations.

F. Demographics Impacts	YES	NO
Has the demographic makeup of the project area changed since the original environmental document was signed?	☐	☒

If 'NO', describe the methodology(ies) to make this determination:

The 2024 Re-evaluation included updated demographic information for the Project based on updates to the US Census American Community Survey 5-year estimates for minority, low income and limited English proficiency populations in the study area. While the updated information showed minor changes in the percentage of residents in those populations in various municipalities throughout the study area, it demonstrated that the overall makeup of those populations remains generally consistent with the 2021 EA/FONSI. In addition, the Project remains consistent with the requirements of Title VI of the Civil Rights Act of 1964, which requires that no person, because of race, color or national origin, be excluded from participation in, denied the benefits of or in any other way be subjected to discrimination under any program or activity receiving Federal assistance. There have been no substantive changes to these factors since the 2024 Re-evaluation that have the potential to result in a new significant impact not already evaluated in the 2021 EA/FONSI or subsequent re-evaluations.

If 'YES', have there been any changes to the following since the approval of the original environmental document:		
• The project's potential for adverse effects on any demographic group?	☐	☐

If 'YES', describe changes, including any changes to previously proposed mitigation and/or environmental commitments:

G. Economic and Farmland Impacts	YES	NO
Are there businesses or farmlands in the study area?	☒	☐
If 'YES', have there been any changes to the following since the approval of the original environmental document:		
• The number of business acquisitions/relocations required?	☐	☒
• The project's potential to have adverse economic impacts on the regional and/or local economy, such as the effects of the project on development, tax revenues and public expenditures, employment opportunities, accessibility, and retail sales?	☐	☒
• The project's potential to have adverse effect on established businesses or business districts?	☐	☒
• The project's impact on farmland or farming operations?	☒	☐

Describe changes, including any changes to previously proposed mitigation and/or environmental commitments:

Compared to the 2021 EA/FONSI, the 2024 Re-evaluation documented a slight decrease in the number of planned acquisitions from business properties (from 93 to 80), a notable increase in the number of farms affected (from 25 to 52) and a slight increase in the projected acquisition of agricultural lands (from 65.68 acres to 70 acres). These changes primarily reflect modifications in strip takings from businesses and farms based on progress in final design. In addition, the number of agricultural parcel impacts noted in the 2024 Re-evaluation increased due to advancement in the design of stormwater retention ponds along the corridor (the 2021 EA/FONSI factor sheets did not include ponds in the agricultural impact estimates). After coordination on the changed impacts, the Wisconsin Department of Agriculture, Trade, and Consumer Protection (DATCP) determined that a new Agricultural Impact Statement (AIS) was not required.

The 2021 EA/FONSI and 2024 Re-evaluation differed in how agricultural impacts were reported – those differences are briefly summarized below to facilitate accurate comparison of the earlier changes in impacts with the changes noted in this 2026 Re-evaluation.

The factor sheets included with the 2021 EA/FONSI identified a total of 60.8 acres of impact to agricultural land. That total included impacts near proposed interchanges at County E, County U, County S and Southbridge Road, but it did not include impacts from planned stormwater retention ponds. The factor sheets also noted that 25 farms would be impacted, which was based on a partial count of impacted parcels. The AIS (#4357) prepared for the I-41 Project during that time identified 65.68 acres of impacts to agricultural land. The AIS included estimated impacts for stormwater retention ponds, but it did not include impacts to agricultural parcels near the Southbridge Road interchange since those were evaluated earlier by DATCP under a different AIS (#3839) for the Brown County South Bridge Connector. Based on the information available at the time of the 2021 EA/FONSI, the total impacts to agricultural land (including proposed stormwater ponds and Southbridge Road interchange) could be estimated as follows:

- Total Area Required from Farm Operations: 114.98 acres (65.68 acres from I-41 AIS parcels + 49.3 acres at Southbridge Road interchange which includes a WisDOT-owned parcel rented as farmland)
- Number of Farms Affected: 33 parcels (25 parcels near interchanges + 7 parcels for stormwater ponds + 1 parcel already owned by WisDOT but rented as farmland that was not included in the AISs)

For the 2024 Re-evaluation, an updated analysis of impacts to agricultural parcels was conducted to support updated coordination with DATCP on whether an AIS addendum would be required to evaluate the changes. The analysis included parcels evaluated in the I-41 AIS as well as relevant parcels from the separate South Bridge Connector AIS. The updated analysis also incorporated agricultural parcels needed for stormwater retention ponds and parcels newly impacted by strip takings. That analysis showed 67.48 acres of impact, but it omitted the 10.5-acre WisDOT-owned parcel leased as farmland in the NE quadrant of the proposed Southbridge Road interchange. The 2024 Re-evaluation also noted impacts to 52 agricultural parcels, but that count included four previously impacted parcels that were no longer impacted after design changes. If all changes in agricultural impacts were considered, the 2024 Re-evaluation could have characterized the changes as a decrease in acres of impacts but an increase in the number of impacted parcels compared to the 2021 EA/FONSI. Based on the information available at the time of the 2024 Re-evaluation, the total impacts to agricultural land could be estimated as follows:

- Total Area Required from Farm Operations: 77.98 acres (31.39 acres from I-41 AIS parcels + 36.09 acres from relevant South Bridge Connector AIS parcels + 10.5 acres for WisDOT-owned parcel)
- Number of Farms Affected: 48 parcels (includes WisDOT-owned parcel and omits parcels no longer impacted)

This 2026 Re-evaluation considered the agriculture parcel data from the previous DATCP coordination update conducted for the 2024 Re-evaluation along with more recent right of way linework based on design advancement since the 2024 Re-evaluation. The updated analysis showed a slight decrease in the overall impacts:

- Total Area Required from Farm Operations: 76.18 acres
- Number of Farms Affected: 47 parcels

The reduction in acquisition of agricultural land compared to the 2024 Re-evaluation and 2021 EA/FONSI occurred through additional design progress resulting in slightly narrowed takings throughout the corridor and complete elimination of impacts to one parcel since the 2024 Re-evaluation. There have been no substantive changes to these factors since the 2024 Re-evaluation that have the potential to result in a new significant impact not already evaluated in the 2021 EA/FONSI or subsequent re-evaluations.

H. Historic Resource/Archaeological/Burial Site Impacts	**YES**	**NO**
Are there historic/archeological resources or burial sites in the study area?	☐	☒
If 'YES', have there been any changes to the following since the approval of the original environmental document:		
• The status of National Register-listed or eligible sites in the project area?	☐	☐
• The conclusions reached in the original environmental document regarding the project's effect on cultural and historical resources?	☐	☐
• The project activities described in consultation or findings letters previously submitted to SHPO or other consulting parties?	☐	☐

Describe changes, including any changes to previously proposed mitigation and/or environmental commitments:

The 2024 Re-evaluation included additional archaeology and architecture/history surveys to evaluate revision of the area of potential effects (APE) to include the increased property acquisition needed to accommodate design changes since the 2021 EA/FONSI. The State Historic Preservation Office (SHPO) concurred in the results of those surveys that the updated Project would have no effect on properties eligible for listing or listed on the National Register of Historic Places.

For this 2026 Re-evaluation, WisDOT conducted additional archaeology research and review for the minor change in the APE resulting from the updated footprint of the Outagamie County Highway Department salt shed and proposed work at the Little Chute ponds. WisDOT found that no previously reported sites were within or directly adjacent to the updated footprint, and the probability of intact cultural deposits was low due to prior disturbance at the sites. In early 2026, WisDOT circulated an amended tribal notification with minor updates to the Project's APE. No replies were received from the tribes or SHPO regarding the project changes. Documentation of the additional assessment and tribal notification is included in **Appendix B**. There have been no substantive changes to these factors since the 2024 Re-evaluation that have the potential to result in a new significant impact not already evaluated in the 2021 EA/FONSI or subsequent re-evaluations.

I. Section 4(f)/Section 6(f)/Other Uniquely Funded Lands	YES	NO
Are there Section 4(f), 6(f) or other uniquely funded lands in the study area?	☒	☐
If 'YES', have there been any changes to the following since the approval of the original environmental document:		
• The status of Section 4(f) properties affected by the proposed action or the project's effects on such properties?	☐	☒
• The determination of whether the project would '"use" land from a Section 4(f) property?	☒	☐
• The status of Section 6(f) or other uniquely funded properties affected by the proposed action?	☐	☒
• The determination of whether the use of a Section 6(f) or other uniquely funded property is a "conversion of use" per Section 6(f) of the LWCFA or other regulation/statute?	☐	☒

Describe changes, including any changes to previously proposed mitigation and/or environmental commitments and attach appropriate Section 4(f) and Section 6(f) documentation:

The 2021 EA/FONSI identified over 20 potential Section 4(f) park and recreation resources within 750 feet of I-41, but there were no Section 4(f) historic or archaeological resources in the Project area. The 2021 EA/FONSI documented that the Project would affect three Section 4(f) recreational resources, with a *de minimis* impact at two Section 4(f) resources (Outagamie County Forest and Prairie Hill Park) and temporary occupancy at one resource (Ballard Road Trail). The 2024 Re-evaluation did not identify changes in the Section 4(f) determinations for the three aforementioned resources. However, during the 2024 Re-evaluation, WisDOT identified one additional Section 4(f) property that would experience a use (Preserve Park, including the Preserve Trail), resulting in an additional *de minimis* determination.

No additional changes to the Project's use of 4(f) resources were identified in this 2026 Re-evaluation, and there have been no substantive changes to these factors since the 2024 Re-evaluation that have the potential to result in a new significant impact not already evaluated in the 2021 EA/FONSI or subsequent re-evaluations.

J. Wetland Impacts	YES	NO
Are there wetlands in the study area?	☒	☐
Are new wetland delineations required?	☒	☐
If 'YES' to either, have there been any changes to the following since the approval of the original environmental document:		
• The project's wetland impacts? *If yes, complete a b and c. Attach resource agency coordination.*	☒	☐

a. Total acres of impact (original/changed): 60.42 acres / 82.72 acres
b. Total acres of temporary impact included in the total acres above (original/changed): 21.49 acres / 6.60 acres
c. Total fill quantities in wetlands (original/changed): 38.93 acres / 76.12 acres

- The project wetland mitigation measures? ☒ ☐

Was a Least Environmentally Damaging Practicable Alternative (LEDPA) determination made? ☒ ☐
If "YES', was the LEDPA determination re-validated? ☐ ☒

Describe changes, including any changes to previously proposed mitigation and/or environmental commitments:

The 2021 EA/FONSI identified permanent impacts to 140 wetlands with combined temporary and permanent impacts totaling 60.42 acres. It was determined that there was no practicable alternative to the proposed construction in wetlands that met the Project purpose and need, and that the Project included all practicable measures to minimize harm done to wetlands from the Project. The 2021 EA/FONSI proposed mitigation of 34.77 acres of permanent wetland impact at a statewide wetland mitigation bank with ratios and acres of compensation to be determined consistent with interagency agreements. Wetlands temporarily impacted by construction would be restored to their previous condition after construction.

The 2024 Re-evaluation documented a number of changes to wetland impacts corridor-wide that occurred after the approval of the 2021 EA/FONSI, resulting from design updates to construction access and staging required to build the roadway, grading required to support the roadway and structures, ditches needed to facilitate drainage of the roadway and other stormwater features. The total proposed wetland impacts in the 2024 Re-evaluation increased to 83.70 acres from the 60.42 acres included in the 2021 EA/FONSI.

Under this 2026 Re-evaluation, temporary and permanent wetland impacts have decreased slightly overall relative to the 2024 Re-evaluation based on further design progress, with total proposed impacts estimated at 82.72 acres. There are impacts to six additional wetlands as compared to the 2021 EA/FONSI. Changes to the salt shed footprint extended beyond the original wetland delineation boundaries, so an additional wetland delineation was completed in May 2025. Details on the permanent and temporary impact acreages from the 2021 EA/FONSI, 2024 Re-evaluation and the current 2026 Re-evaluation are provided in **Table 2**, and changes to wetland impacts under the current design are detailed in the updated Wetland Factor Sheet and accompanying wetland impact tables. Temporary and permanent wetland impacts are also displayed in the **Appendix A** map set.

Table 2: Summary of Changes to I-41 Project Proposed Wetland Impacts

Project Stage	Permanent Wetland Impact (Offsite Mitigation Required)	Permanent Wetland Impact (No Offsite Mitigation)[a]	Temporary Wetland Impact	Total Proposed Impact
2021 EA/FONSI Design	34.77 acres	4.16 acres	21.49 acres	60.42
2024 Re-evaluation Design	70.71 acres	5.51 acres	7.47 acres	83.70
2026 Re-evaluation Design	70.65 acres	5.47 acres	6.60 acres	82.72
Wetlands Impacted by Current Design determined to be under Federal Jurisdiction	49.59 acres	5.31 acres	2.06 acres	56.96 acres
Brown County Portion of South Bridge Connector[b]	0.70 acres	0.17 acres	0 acres	0.87 acres

[a] Impacts in this classification are limited to existing roadside ditches excavated in and draining dry land that do not carry a relatively permanent flow of water. Ditches will be replaced in adjacent proposed roadside where no existing delineated wetlands are present.

[b] Brown County obtained a Section 404 permit and is responsible for construction of the sections of the South Bridge Connector from the County EB/F intersection to the frontage road roundabout west of the Southbridge Road interchange and from the Lawrence Drive intersection to the frontage road roundabout east of the interchange (see **Appendix A** map set). Wetland impacts in these areas have not changed since the 2024 Re-evaluation (the total reported here appears slightly different due to addition errors in the 2024 Re-evaluation).

Wetland impacts were avoided and minimized to the extent practicable, and mitigation will be provided for unavoidable impacts at a WisDOT mitigation bank. WisDOT previously submitted a Section 404 Individual Permit application to the US Army Corps of Engineers (USACE). The Project permit application did not include the portion of the South Bridge Connector roadway being constructed by Brown County as the County is responsible for obtaining their own wetland permit. The USACE determined which wetlands were under federal jurisdiction through the issuance of an Approved Jurisdictional Determination (AJD); wetlands determined to be under federal jurisdiction are also shown in **Table 2**. USACE issued a Section 404 Individual Permit for the Project on February 2, 2024.

Wetland impacts in Outagamie County will be mitigated at the Hope Marsh Phase 2 Mitigation Bank. A total of 58.00 acres of wetland impact will be mitigated at a ratio of 1:1 for a total of 58.00 credits debited from the bank. Wetland impacts in Brown County will be mitigated at the Oneida Mitigation Bank. A total of 12.65 acres of wetland impact will be mitigated for a total of 12.67 credits debited from the bank. Mitigation for the Project totals 70.67 credits for 70.65 acres of Project impacts. Wetland types and mitigation ratios are currently based on Wetland Mitigation Guidelines Version 1 since those guidelines were in effect when the Section 404 permit was issued. These totals do not include impacts from portions of the South Bridge Connector roadway for which Brown County has obtained a permit and is responsible for mitigating (see **Table 2** above for impacts from Brown County sections of South Bridge Connector).

WisDOT will continue coordination with WDNR under the WisDOT-WDNR Cooperative Agreement procedures as additional sections of the project complete final design and advance to final concurrence. Prior to project closeout, in consultation with WDNR and USACE, WisDOT will transition the project to using the updated wetland types and mitigation ratios required under the 2025 update to the WisDOT-WDNR Memorandum of Understanding on Compensatory Mitigation for Unavoidable Wetland Losses Resulting from State Transportation Activities and Wetland Mitigation Guidelines Version 2. WisDOT will also coordinate with USACE as necessary to update the Project's Section 404 Individual Permit and ensure continued compliance with Section 404 requirements. There have been no substantive changes to these factors since the 2024 Re-evaluation that have the potential to result in a new significant impact not already evaluated in the 2021 EA/FONSI or subsequent re-evaluations.

K. Rivers, Streams, Lakes, Springs and Wells Involvement	**YES**	**NO**
Are there rivers, streams, lakes, springs or wells in the study area?	☒	☐
If 'YES', have there been any changes to the following since the approval of the original environmental document:		
• The project's effects on water bodies?	☒	☐
• The project's effects on a navigable water body as defined by USCG (Section 9)?	☐	☒
• The project's effects on Waters of the U.S. as defined by the USACE (Section 404) other than those wetlands described in Item 5.J above?	☒	☐
• The project's effects on Navigable Waters of the U.S. as defined by the USACE (Section 10)?	☐	☒
• The project's effects on a designated Wild and Scenic River or land adjacent to a Wild and Scenic River?	☐	☒
• The project's effects on springs or wells?	☐	☒

Describe changes, including any changes to previously proposed mitigation and/or environmental commitments:

The 2021 EA/FONSI identified 25 waterway crossings with impacts at 22 of the crossings. The surface waters impacted are tributaries to Mud Creek or the Fox River or are one of three named streams (Apple Creek, Ashwaubenon Creek and Hemlock Creek) or their tributaries, several of which the roadway crosses multiple times. The 2021 EA/FONSI proposed replacing and/or extending most culverts, realigning multiple surface waters that run next to existing roadways and constructing a new bridge at Hemlock Creek as part of the South Bridge Connector.

The current Project design includes direct impacts at 22 waterway crossings. The two waterway crossings that are being constructed by Brown County as part of the South Bridge Connector project are not anticipated to result in permanent impacts since the new bridge over Hemlock Creek (Waterway S-B-8) clear-spans the creek and the existing culvert at Ashwaubenon Creek (S-C-6) does not require modification for the widening of Southbridge Road (County GV). One structure on a waterway on the north side of County J that had proposed work under the 2021 EA/FONSI was removed from the design of the project in the 2024 Re-evaluation because the limits of work at County J were refined to eliminate the structure from the project area. In addition, the 2024 Re-evaluation identified impacts at one additional waterway crossing (S-A-3) not anticipated to be impacted in the 2021 EA/FONSI. Since approval of the 2021

EA/FONSI, design advancement has determined structure type, width and length for structures crossing navigable waterways. **Table 3** shows work proposed for waterway crossings within the Project area under the 2021 EA/FONSI, the 2024 Re-evaluation and this 2026 Re-evaluation.

Table 3: Waterway Work Proposed for the I-41 Corridor Project

Stream ID	Watershed	Location	Work Proposed under the 2021 EA/FONSI	Work Proposed under the 2024 Re-evaluation	Work Proposed under this 2026 Re-evaulation
Waterway S-A-12	Fox River Appleton	WIS 15/County OO Interchange, south of interchange	Replace and extend culvert ~10 feet	Replace and extend culverts, 11 ft total	Replace and extend culverts, 11 ft total
	Fox River Appleton	WIS 15/County OO Interchange, southwest quadrant of interchange	Replace and extend culvert ~125 feet	Drainage diverted to stormwater pond eliminating the need for culvert; channel fill of 280 feet	Drainage diverted to stormwater pond eliminating the need for culvert; channel fill of 299 feet (updated to reflect slope intercepts)
Waterway S-A-11	Fox River Appleton	I-41 between WIS 15 and WIS 47	Replace culvert	Replace existing culvert with two new culverts under Lynndale Drive and I41; restore 300 feet of stream channel to align with new culverts	Replace existing culvert with two new culverts under Lynndale Drive and I41; restore 264 feet of stream channel to align with new culverts (updated to reflect slope intercepts)
Waterway S-A-10	Fox River Appleton	I-41 between WIS 15 and WIS 47	Replace culvert	Remove culvert and replace with bridge over stream; restore 450 feet of open channel; improve water quality through TSS reduction	Remove existing culvert and realign 129 feet of channel to flow under bridge; restore 450 feet of open channel; improve water quality through TSS reduction
Waterway S-A-9	Apple and Ashwaubenon Creeks	I-41 just east of WIS 47	Replace culvert	Replace and extend culvert, 8 ft total	Replace and extend culvert, 8 ft total
Waterway S-D-3	Apple and Ashwaubenon Creeks	I-41 between WIS 47 and County E (Ballard Road) Interchange, east of Meade Street	Replace culvert	Replace and extend culvert, 40 ft total; avoided impact to 1295 ft of waterway on south side of roadway	Replace and extend culvert, 40 ft total; avoided impact to 1295 ft of waterway on south side of roadway
	Apple and Ashwaubenon Creeks	I-41 crossing west of County E interchange and along north side of I-41 west of County E interchange	Replace culvert, Relocate ~300 feet of the reach to the north	Replace and extend culvert, 36 ft total; relocate 375 feet of the navigable channel on the north side of I-41	Replace and extend culvert, 36 ft total; relocate 21 feet of the navigable channel on the north side of I-41 (updated to reflect slope intercepts)
Waterway S-D-2	Apple and Ashwaubenon Creeks	I-41 between County E (Ballard Road) and WIS 441	Replace and extend culvert ~15 feet	Replace and extend culvert, 30 ft total	Replace and extend culvert, 30 ft total
Waterway S-C-7	Apple and Ashwaubenon Creeks	Reach between French Road and Holland Road	Replace and extend culvert approximately 10 Feet. Relocate ~2,000 feet of the reach to the north	Replace and extend culvert on French Road, 40 ft total; relocate 3960 feet of the navigable channel on the north side of I-41	Replace and extend culvert on French Road, 80 ft total; relocate 4003 feet of the navigable channel on the north side of I-41

	Apple and Ashwaubenon Creeks	Culvert under Holland Road	Replace and extend culvert under Holland Road ~10 feet	Replace and extend culvert, 80 ft total; relocate 250 feet of navigable channel on the north side of I-41 (east of culvert)	Replace and extend culvert, 80 ft total; relocate 580 feet of navigable channel on the north side of I-41 (east of culvert)
	Apple and Ashwaubenon Creeks	I-41 crossing just east of Holland Road	Replace and extend culvert ~10 feet	Replace and extend culvert, 36 ft total; relocate 200 feet of navigable channel on the south side of I-41 (east of culvert)	Replace and extend culvert, 36 ft total; relocate 192 feet of navigable channel on the south side of I-41 (east of culvert)
Waterway S-C-3	Apple and Ashwaubenon Creeks	I-41 between WIS 441 and County N	Replace culvert	Replace and extend culvert, 16 feet total	Replace and extend culvert, 16 feet total
Waterway S-D-1	Apple and Ashwaubenon Creeks	I-41 between County N and WIS 55	Replace and extend culvert ~10 feet	Replace existing single culvert with two culverts and extend 28ft total	Replace existing single culvert with two culverts and extend 28ft total
Waterway S-C-2	Apple and Ashwaubenon Creeks	I-41 between WIS 55 and County J	Replace and extend culvert ~10 feet	Replace and extend culvert, 40 ft total	Replace and extend culvert, 40 ft total
Waterway S-B-5	Apple and Ashwaubenon Creeks	County J (Hyland Avenue) Interchange	Replace and extend culvert ~25 feet	No work on culvert	No work on culvert
Waterway S-B-3 (Apple Creek)	Apple and Ashwaubenon Creeks	I-41 between County U and County S	Reconstruct bridge and replace existing pier in river with one solid shaft 3-foot-wide pier wall the width of the proposed freeway or four 30-square foot piers	Reconstruct bridges and remove existing piers; replace with single span structure with no piers in the waterway	Reconstruct bridges and remove existing piers; replace with single span structure with no piers in the waterway
Waterway S-A-3	Apple and Ashwaubenon Creeks	Reach west of Mid Valley Drive on south side of County S	Replace and extend culvert ~90 feet	Replace and extend culvert, 64 feet total	Replace and extend culvert, 64 feet total
	Apple and Ashwaubenon Creeks	Reach between southbound exit ramp and Mid Valley Drive on north side of County S	Replace and extend culvert ~90 feet	Replace and extend culvert, 68 feet total	Replace and extend culvert, 65 feet total
	Apple and Ashwaubenon Creeks	Reach between Mid Valley Drive and ramp	No work proposed	Relocate 600 ft of navigable waterway, channel will be replaced in-kind to the west of existing location	Relocate 650 ft of navigable waterway, channel will be replaced in-kind to the west of existing location
	Apple and Ashwaubenon Creeks	Crossing under I-41, northbound entrance ramp & southbound exit ramp	Replace and extend culvert ~45 feet	Replace and extend culvert, 70 feet total	Replace and extend culvert, 166 feet total
Waterway S-C-11	Apple and Ashwaubenon Creeks	I-41 crossing south of Little Rapids Road	Replace culvert	Replace and extend culvert under I-41, 5 feet total	Replace and extend culvert under I-41, 7 feet total
Waterway S-C-12 (Ashwaubenon Creek)	Apple and Ashwaubenon Creeks	I-41 between County S and South Bridge Connector	Replace Culvert under I-41	Existing culvert to remain in place; stabilize bank on east side of roadway	Existing culvert to remain in place; stabilize bank on east side of roadway
Waterway S-A-1 (Hemlock Creek)	Apple and Ashwaubenon Creeks	I-41 crossing north of Southbridge Road	Replace culvert	Replace and extend culvert 15 ft on east side	Replace and extend culvert 10 ft on east side

Waterway S-B-8 (Hemlock Creek)[a]	Apple and Ashwaubenon Creeks	South Bridge Connector west of I-41 interchange (County EB)	New bridge will clear-span Hemlock Creek – no permanent impact	New bridge will clear-span Hemlock Creek – no permanent impact	New bridge clear-spans Hemlock Creek – no permanent impact
Waterway S-C-6 (Ashwaubenon Creek)[a]	Apple and Ashwaubenon Creeks	South Bridge Connector east of I-41 interchange (County GV)	Widen Southbridge Road to 4 lanes – no impact	Widen Southbridge Road to 4 lanes – may require culvert modification or replacement	Widen Southbridge Road to 4 lanes; existing culvert can remain unmodified – no impact

[a] Crossing are being constructed by Brown County

Navigable waterways were defined by applying the state definition of navigability as confirmed by WDNR. Channel relocation is proposed for 5875 linear feet of waterways impacted by road footprint expansion. These waterways would be replaced in the new road right of way with channels of similar hydrologic and hydraulic capacity. Channel relocations have met state and federal waterway permitting requirements. This information was submitted to WDNR and USACE for review under Section 404 and 401 of the Clean Water Act and USACE agreed that replacement in-kind of the ditches was appropriate for the impacts to the waterways and that no formal mitigation is required.

Updated Surface Water Factor Sheets describe work in all navigable waterways under the current Project design. A separate factor sheet is provided for each 12-digit Hydrologic Unit Code watershed. The updated waterway impact table provided with the factor sheets reflects the impacts of the current Project design and corresponds to waterways labeled and proposed structures shown in the **Appendix A** map set.

There are no proposed impacts to Section 10 waterways under the current Project design. There are no impacts to Wild and Scenic Rivers or land next to Wild and Scenic Rivers under the current Project design. No springs or wells have been identified that would be impacted by the current Project design. If existing wells are discovered during construction, WisDOT will follow NR 812.26 Wis. Adm. Code for well abandonment. There have been no substantive changes to these factors since the 2024 Re-evaluation that have the potential to result in a new significant impact not already evaluated in the 2021 EA/FONSI or subsequent re-evaluations.

L. Floodplains Impacts	YES	NO
Are there floodplains or floodways in the study area?	☒	☐
If 'YES', have there been any changes to the following since the approval of the original environmental document:		
• The project's encroachment into the 100-year floodplain?	☒	☐
• The project's potential to encroach on a regulatory floodway?	☒	☐
• The project's consistency with local flood protection standards and E.O. 11988?	☐	☒
Was FHWA required to make an Only Practicable Alternative Finding under 23 CFR 650.113?	☐	☒
If 'YES', was the Only Practicable Alternative Finding re-validated?	☐	☐

Describe changes, including any changes to previously proposed mitigation and/or environmental commitments:

Eight surface waters along the Project corridor have floodplains. Surface waters with floodplain encroachments include tributaries to Mud Creek and Apple Creek, Ashwaubenon Creek and Hemlock Creek. The 2021 EA/FONSI reported seven transverse and five longitudinal encroachments of these floodplains, resulting in approximately eight acres of encroachment. Factor sheets completed for the 2021 EA/FONSI stated that the design was not advanced enough to make a detailed determination on the Project's impacts to regulatory floodplains. The 2021 EA/FONSI committed that final design in the regulatory floodplain would be consistent with DNR Floodplain Management NR 116 criteria and would include coordination with the local floodplain zoning authorities (Outagamie and Brown counties). Following the 2021 EA/FONSI, WisDOT completed hydraulic and hydrologic analysis for each area of mapped floodplain within WisDOT's construction limits and determined that no change to the regulatory floodplain would result from Project implementation. The 2024 Re-evaluation reported the results of WisDOT's analysis and included an updated Floodplain Factor Sheet for each area where floodplain is present.

For this 2026 Re-evaluation, there have been no changes to the Project's anticipated impacts to floodplains described in the 2024 Re-evaluation. Areas where the Project intersects regulatory floodplains are shown in the **Appendix A** map set. Floodplain analysis for the Brown County portion of the South Bridge Connector was completed as part of final design. Any required permits or approvals for portions of the project outside of WisDOT project limits are being obtained by Brown County. Regulatory floodplains in those areas are associated with Hemlock Creek and Ashwaubenon Creek. There have been no substantive changes to these factors since the 2024 Re-evaluation that have the potential to result in a new significant impact not already evaluated in the 2021 EA/FONSI or subsequent re-evaluations.

M. Fish and Wildlife Impacts	YES	NO
Is there fish, wildlife or migratory bird species or habitat in the study area?	☒	☐
If 'YES', have there been any changes to the following since the approval of the original environmental document:		
• The project's effects on wildlife or fish species or habitat?	☐	☒
• The project's effect on migratory birds?	☒	☐

Describe changes, including any changes to previously proposed mitigation and/or environmental commitments:

The 2021 EA/FONSI reported no impacts to unique wildlife and habitat within the Project corridor, and the 2024 Re-evaluation reported no new identifications of fish or wildlife species or habitat, and no design changes that would cause impacts to fish or wildlife species or habitat.

Impact avoidance and minimization measures for native fish species for work in waterways has been coordinated with WDNR. To avoid and minimize impacts to native fish species, work that would disturb the bed or banks of waterways would be avoided from March 1 to June 15 for most waterways in the corridor. Work would be avoided from March 1 to May 31 for three waterways (tributaries to Mud Creek) identified by WDNR as having less suitable habitat and use by native fish. Some portions of Apple Creek have time out dates of March 1 to May 15 due to decreased aquatic passage since the stream travels through a series of detention ponds or has steep elevations. These time of year restrictions are detailed in project plans and special provisions for contracts with work in each waterway.

Migratory bird species are known to occur within and near the Project area. During the preparation of the 2021 EA/FONSI, WisDOT updated standard special provisions to prevent establishment of migratory bird nesting on bridges and culverts to comply with the Migratory Bird Treaty Act (MBTA), and WisDOT finalized MBTA Compliance Guidance in March of 2021 as a reference tool for project teams. All Project activities that potentially impact migratory bird species would implement avoidance and minimization measures outlined in the guidance through standard special provisions for migratory bird exclusion at bridges and culverts that would be impacted by the Project and any other potential suitable habitat for migratory bird species as defined in the guidance document. Since the completion of the 2024 Re-evaluation, WisDOT conducted inspections for upcoming construction projects, identified the need for MBTA depredation permits at two bridges and obtained the permits. While the transition from deterring nesting to obtaining depredation permits represents a minor change in the Project's effects on migratory birds, overall, there have been no substantive changes to fish and wildlife impacts since the 2024 Re-evaluation that have the potential to result in a new significant impact not already evaluated in the 2021 EA/FONSI or subsequent re-evaluations. See next section for a discussion of impacts to state- and federally listed threatened and endangered species and habitat.

N. Threatened and Endangered Species (T&E) Impacts	YES	NO
Are there any federally-listed T&E species or critical habitat in the study area?	☒	☐
Are there any state-listed T&E species in the study area?	☒	☐
If 'YES', have there been any changes to the following since the approval of the original environmental document:		
• The status of listed, proposed or candidate T&E species that will be directly or indirectly affected by the project?	☒	☐
• The status of critical habitat for federally-listed species in the project area?	☒	☐
• The project's effect or the WDNR/USFWS effect finding on listed, proposed or candidate T&E species or designated critical habitat for federally-listed species?	☒	☐

Describe changes, including any changes to previously proposed mitigation and/or environmental commitments:

The 2023 and 2024 Re-evaluations included updates to WisDOT's Endangered Species Act (ESA) Section 7 consultation with the US Fish and Wildlife Service (USFWS) to address changes in project design and impacts, and changes in the listing and status of various species since the 2021 EA/FONSI. For this 2026 Re-evaluation, WisDOT completed further analysis and updated consultation with USFWS regarding the rusty patched bumble bee (*Bombus affinis*) (RPBB) and eastern prairie fringed orchid (*Platanthera leucophaea*) (EPFO). WisDOT also updated the project record to reflect the reclassification of the monarch butterfly (*Danaus Plexippus*) from a candidate species to proposed threatened under the ESA and made progress in fulfillment of a commitment for a state-listed threatened plant.

The updated ESA analysis and consultation address March 2025, May 2025 and March 2026 updates to the RPBB High Potential Zone (HPZ) and the July 14, 2025, updates to the range of the EPFO. The updated analysis and consultation are summarized in the sections below and **Appendix C** includes updated USFWS consultation documentation including:

- Updated USFWS species list
- Updated Minnesota-Wisconsin Endangered Species Determination Key
- Updated RPBB Informal Consultation
- New EPFO informal consultation
- USFWS concurrence with "May Affect, Not Likely to Adversely Affect" determination
- USFWS Biological Opinion (BO) from January 17, 2024

RPBB

USFWS updated the RPBB HPZ in March 2025, May 2025 and March 2026. The 2025 updates resulted in changes to the HPZ within the project area but the 2026 update resulted in no changes in the project area. The revised HPZ overlapped a 3-mile section of the I-41 project corridor, as shown in **Figure 1** of the updated RPBB Informal Consultation in **Appendix C**. Prior to the updated HPZ, USFWS had not identified the RPBB HPZ within the project area and the BO from January 17, 2024, did not address the RPBB. The portion of the project in the RPBB HPZ begins 0.3 miles east of the WIS 47 interchange and continues to the WIS 441 interchange. Land use in this area is mostly single-family residential, except for the WIS 47 interchange and the area between Ballard Road and WIS 441, which are commercial. The north side of I-41 is a mix of single- and multi-family residential, and commercial businesses. Between N. Meade Street and County E (Ballard Road), the Apple Creek Trail runs through open space surrounded by emergent wetlands and surrogate grasslands to the south and agricultural fields to the north and east. Locations outside of the project corridor appear to have more transitional habitat preferred for nesting queens. Suitable nesting habitat may be present outside of the project footprint at greater distances from the interstate such as southwest of the Ballard Road interchange at Appleton Memorial Park and Sheig Center and Gardens. Other suitable nesting habitat could be present outside of the project footprint at the Guardian Life Insurance Co-America complex southeast of the Ballard Road interchange, and the Thrivent complex northwest of this interchange. However, the corridor right of way consists mainly of surrogate grassland in ditches and swales associated ruderal wet meadow and shallow marsh community types.

WisDOT reinitiated informal Section 7 consultation with USFWS for the I-41 project regarding the expansion of the RPBB HPZ under delegated authority from FHWA. WisDOT obtained from USFWS's Information for Planning and Consultation (IPaC) tool an updated Species List on April 8, 2025 (updated again in September 2025). WisDOT also completed the Rusty Patched Bumblebee Range-wide Key found in the Voluntary Implementation Guidance Version 3.3, which generated a "May Affect" determination. USFWS had not yet made the RPBB determination key available through the IPaC tool at the time of this informal consultation.

WisDOT prepared a detailed site review of the I-41 project corridor in relation to the RPBB which determined that the project had a total disturbance in the HPZ of 74.5 acres. 51.2 acres of the total were identified as potentially suitable, but very low-quality habitat due to compacted soils, low vegetative diversity and invasive species prevalence. The remaining 23.3 acres are considered unsuitable habitat due to roadway salt, noise, mowing impacts and invasive phragmites. Based on the findings of the detailed site review, WisDOT requested USFWS concurrence for an effect determination of "May Affect, Not Likely to Adversely Affect" for the RPBB.

On April 11, 2025, USFWS provided concurrence with a determination of "May Affect, Not Likely to Adversely Affect" for the RPBB. USFWS again concurred with the RPBB effect determination on September 29, 2025, after WisDOT updated their informal consultation to include EPFO, described below. USFWS concurred that the I-41 project action area consists of very low-quality nesting and foraging habitat due to soil compaction, proximity to highway noise and salt impacts, regular mowing, invasive species and lack of floral resources to support nests, making it unlikely that the species would occur in these areas. WisDOT has agreed to continue maintenance mowing and that areas already stripped of vegetation will deter feeding and nesting and will encourage project construction activities to avoid bees

during sensitive periods, such as nesting and foraging. WisDOT also committed to initiate sufficient ground disturbance to remove nesting and foraging habitat during the overwintering season, prior to April 15, 2026, in an area associated with project ID 1130-64-73. USFWS updated the RPBB HPZs again on March 17, 2026, which resulted in no changes in anticipated impacts from the Project, so the prior consultation and effect determination remains valid. On June 1, 2026, USFWS published a final rule designating critical habitat for the RPBB, effective on July 1, 2026. The I-41 Project does not overlap the RPBB critical habitat. Updates to the RPBB environmental commitments and an updated Threatened, Endangered and Protected Resource Factor Sheet are provided below.

Monarch Butterfly

The 2021 EA/FONSI identified the monarch butterfly (*Danaus plexippus*) as a candidate species. On January 17, 2024, USFWS issued a BO for the I-41 project. At the time the BO was issued, the monarch butterfly was a candidate species for listing to the ESA. On December 12, 2024, USFWS proposed to list the monarch butterfly as a threatened species with protective regulations under ESA Section 4(d). The status of the monarch butterfly has been revised in the I-41 project environmental record; however, the determination for the monarch butterfly provided within the BO remains valid as documented below.

The BO issued by USFWS January 17, 2024, determined that given the availability of other habitat for the monarch butterfly within and abutting the corridor, this project is unlikely to jeopardize the continued existence of the species. As of December 12, 2024, the monarch butterfly species has been reclassified as proposed threatened under the ESA. Per 16 U.S.C. §1536(a)(4), consultation is only required for proposed species if the actions are likely to jeopardize the continued existence of the species. Since the BO determined that the I-41 project was unlikely to jeopardize the continued existence of the monarch butterfly, no further Section 7 consultation with USFWS is needed at this time.

The updated USFWS Species List and Minnesota-Wisconsin Endangered Species Determination Key for the I-41 project can be found in **Appendix C**, and an updated Threatened, Endangered and Protected Resource Factor Sheet is provided below.

EPFO

The 2021 EA/FONSI did not include consultation or an effect determination for the EPFO since it was not included on the USFWS Species List at that time. On July 14, 2025, USFWS updated the range of the EPFO with an extent similar to the updated RPBB HPZ described above, which resulted in EPFO appearing on the updated USFWS Species List. In July 2025, WisDOT completed a desktop assessment and field verification of habitat suitability for the construction IDs that overlapped the EPFO range. WisDOT's assessment concluded that EPFO presence was unlikely and effects would be discountable due to the heavily disturbed soils (disturbed prior to EPFO range update), presence of invasive species and general low quality of the vegetated areas in the corridor. WisDOT sought concurrence from USFWS in a determination of "May Affect, Not Likely to Adversely Affect" for EPFO, and USFWS concurred in that determination on September 29, 2025, noting that the WDNR Natural Heritage Inventory showed no known EPFO occurrences within a 2-mile buffer of the project limits, see **Appendix C**.

Avoidance and Minimization Measures

Construction of the I-41 project is planned in phases. The Ballard Road interchange portion started construction in April of 2025, and mainline construction is anticipated to start in September of 2026. Actions deterring RPBB foraging and nesting have occurred at the SW and SE quadrants of the Ballard Road interchange construction sites due to utility placement. The ground disturbing work that has already taken place in the overwintering timeframe has helped avoid and minimize impacts come the active season.

Vegetation stripping of all ground disturbance locations is unlikely to be implemented ahead of the 2026 mainline construction. Stripping of vegetation during the overwintering period ahead of the September 2026 construction start times would require bare soil for a duration that would conflict with erosion control best practices. The project will continue the maintenance operation mowing in the corridor. Considering nesting is unlikely in the project areas due to compacted soils, these mowing efforts during the 2026 nesting season are anticipated to help discourage nesting and foraging in the action area. An updated table of I-41 environmental commitments is provided below.

No avoidance or minimization measures are required for the monarch butterfly or EPFO.

State-Listed Species

WisDOT received concurrence from WDNR on September 2, 2025, for the completion of a monitoring plan for a state-listed threatened plant that was required by the incidental take authorization, which fulfilled WisDOT's monitoring requirements. The results of the monitoring report showed mixed results across the relocated clusters, with a few clusters facing challenges from invasive encroachment and animal disturbance. WisDOT coordinated with WDNR on additional voluntary measures outside of the requirements of the incidental take authorization to support the relocated clusters, including planting of associate species and additional management activities to control invasive species encroachment. WisDOT efforts are ongoing to plant associate species and conduct spot stump treatment of invasives. WisDOT is also coordinating with Casaloma Conservancy on the status of the management efforts.

Conclusion

Based on WisDOT's updated analysis and consultation, USFWS concurrence in updated ESA effect determinations and WisDOT's progress in fulfilling commitments for both federal and state-listed species, there have been no substantive changes to these factors since the 2024 Re-evaluation that have the potential to result in a new significant impact not already evaluated in the 2021 EA/FONSI or subsequent re-evaluations.

O. Unique Upland Habitat	YES	NO
Has any unique upland habitat been identified in the study area?	☐	☒
If 'YES', have there been any changes to the following since the approval of the original environmental document:		
• The project's effect on identified unique upland habitat?	☐	☒

Describe changes, including any changes to previously proposed mitigation and/or environmental commitments:

The 2021 EA/FONSI reported no impacts to unique wildlife habitat within the project corridor. Since then, there have been no changes in design, designation of lands or identification of new habitat that have changed the Project's anticipated impacts to unique wildlife habitat. Overall, there have been no substantive changes in impacts to these factors since the 2024 Re-evaluation that have the potential to result in a new significant impact not already evaluated in the 2021 EA/FONSI or subsequent re-evaluations. See previous section for a discussion of impacts to state- and federally listed threatened and endangered species and habitat.

P. Air Quality (Conformity)	YES	NO
Have there been any changes to the following since the approval of the original environmental document:		
• the project's effect on a non-attainment area or maintenance area, which will require a new or revised conformity determination?	☐	☒
• the requirement to perform a hot-spot analysis for mobile source air toxics or $PM_{2.5}$?	☐	☒

Describe changes, including any changes to previously proposed mitigation and/or environmental commitments:

The 2021 EA/FONSI completed a qualitative analysis for Mobile Source Air Toxics (MSATs) because the project included a new interchange connecting an existing roadway with a new roadway (Southbridge Connector Interchange). According to FHWA's 2016 guidance on MSATs analysis in NEPA documents, the project is considered to have low potential MSAT effects, because it serves to improve operations of a highway without creating a facility that is likely to meaningfully increase MSAT emissions, and the project would not create or significantly alter a major intermodal freight facility that involves a significant number of diesel vehicles. FHWA made minor updates to their MSATs guidance in 2023, but the previous project analysis and conclusions remain consistent with the updated guidance.

The results of the analysis found that the project would have low potential for MSAT effects (Tier II). Also, emissions would likely be lower than present levels in the design year because of U.S. EPA's national control programs that are projected to reduce annual MSAT emissions by over 76 percent between 2020 and 2060 (FHWA, 2023). In addition, MSATs would be lower in other locations when traffic shifts away from them. At a regional scale, EPA's vehicle and fuel regulations, coupled with fleet turnover, would cause substantial reductions over time that in almost all cases would cause regionwide MSAT levels to be substantially lower than today. There have been no substantive changes to these factors since the 2024 Re-evaluation that have the potential to result in a new significant impact not already evaluated in the 2021 EA/FONSI or subsequent re-evaluations.

Q. Noise Impacts

	YES	NO
Have there been any changes to the following since the approval of the original environmental document:		
• The project's scope or design that would change the project to or from a Type I project per Procedure 23-10-1 of the WisDOT Facilities Development Manual?	☐	☒
• Factors that influence sound levels as described in Section 23-15 of the WisDOT Facilities Development Manual that would require a revision to the noise analysis completed for the original environmental document?	☒	☐
• Determinations regarding the feasibility and reasonability of mitigation for identified noise impacts?	☒	☐

Describe results of a new noise analysis, identification of new impacts, newly identified noise sensitive receptors or changes in noise abatement measures. If noise abatement was determined feasible and reasonable, identify what public involvement has occurred and explain what public involvement is still required.

The 2024 Re-evaluation included an updated analysis of the final locations of noise barriers determined to be feasible and reasonable, land development and changes in noise sensitive land uses throughout the corridor that occurred after the approval of the 2021 EA/FONSI. The review identified several residential units on Rifle Range Road and other developments in the corridor that were not considered in the analysis completed for the EA/FONSI. The updated analysis completed for the 2024 Re-evaluation also transitioned from the 133 representative noise receptors used in the 2021 EA/FONSI to placing a receptor on every building or noise receiving source, increasing the total to 1,313 receptors. The updated analysis found that Barriers 1 – 6 were still feasible and reasonable and Barriers 1A, 7, and 9 were also feasible and reasonable with cost averaging. Voting by benefitted receptors occurred in late 2023 through early 2024, and for each barrier, a simple majority of votes received was in favor of building the barrier.

Since the approval of the 2024 Re-evaluation, two barriers along the Project corridor, Barrier 1A and Barrier 9, had minor design alterations based on requests from property owners to maintain views of property signage. WisDOT agreed to the requested design alterations because they did not result in a loss of benefit to impact receptors other than to the receptor requesting the change for Barrier 1A. WisDOT also adjusted the noise barrier reasonableness threshold in their noise policy (FDM 23-35) between the development of the noise analysis report for the Project and this 2026 Re-evaluation. Per policy, WisDOT periodically reviews and adjusts the reasonableness criteria based on actual costs of construction for noise barriers in the state. Due to recent increases in costs, the cost criteria identified in WisDOT's noise policy increased to $75.00 per square foot for estimating barrier construction costs, and the reasonableness threshold increased to $125,000 per benefited receptor. The I-41 Project noise report included costs of $30 per square foot and $50,000 per benefited receptor because those were the criteria when the report was prepared. Since the two numbers were adjusted proportionally, the update did not affect which previously identified barriers are or are not determined to be reasonable, but rather it gives a more accurate representation of anticipated construction costs. There have been no substantive changes to these factors since the 2024 Re-evaluation that have the potential to result in a new significant impact not already evaluated in the 2021 EA/FONSI or subsequent re-evaluations.

R. Hazardous Materials or Contaminated Sites

	YES	NO
Have hazardous materials or contaminated sites been identified in the study area?	☒	☐
If 'YES', have there been any changes to the following since the approval of the original environmental document:		
• The status of known or potentially contaminated sites within or adjacent to the existing and/or proposed ROW?	☒	☐
• Any proposed excavation plans adjacent to, or within, a known contaminated site?	☒	☐
• The potential for encountering contamination during construction?	☒	☐
• Have any remediation sites affecting the project been closed with continuing obligations?	☒	☐
• Additional bridge repairs or replacements requiring asbestos inspection?	☐	☒

Describe changes, including any changes to previously identified remediation plans and/or environmental commitments:

The 2021 EA/FONSI completed a Preliminary Phase 1 Hazardous Material Assessment which evaluated a total of 168 sites categorized as follows:

- 150 sites with no further action recommended.
- 5 sites identified for Phase 2 subsurface investigation.

- 9 sites identified for Phase 2.5 subsurface investigation.
- 4 sites identified for coordination with WDNR where industrial byproducts (fly ash) were used as fill.

Bridges in the study area were inspected for asbestos-containing material (ACM), and two bridges were found to contain small quantities of non-friable ACM caulk.

The 2024 Re-evaluation reported the following progress in investigation and coordination for contaminated sites:

- 4 sites completed Phase 2.5 subsurface investigation (one required an excavation management plan for disposal of contaminated soils).
- 10 spill and leaking underground storage tank (LUST) sites with additional investigation to be completed when final design determined the limits of subsurface excavation.
- 1 fly ash site (I-41/WIS 15 interchange) completed WDNR coordination.
- 3 fly ash sites with WDNR coordination pending.

For this 2026 Re-evaluation, the previous Phase 1 Assessment was revisited, and the original number of 168 sites was increased to 173 sites to capture an added site and split up four fly ash sites that had previously been lumped into one site. These sites are currently categorized as follows:

- 165 sites with no additional action needed, based either on the recommendation in the original assessment or subsequent completion of required investigation and/or coordination.
- 2 sites with additional investigation needed near the County S interchange.
- 6 sites with additional obligations/coordination needed (including four fly ash locations and one site identified after the Phase 1 assessment).

WisDOT will coordinate with WDNR for excavation, handling and disposal of any contaminated soil or groundwater to meet state and federal law. Standard special provision 203-005 with bid item 203.0201.s will be included when appropriate in the construction documents, and the contractor would be responsible for completion of the Notification of Demolition and/or Renovation (DNR form 4500-113), as required. Agency coordination for historic use of industrial byproducts (fly ash) is allowed under NR 538.10. In general, WisDOT will reuse material on site following restrictions from NR 538.19. Material that cannot be used on site will be delivered to a landfill. There have been no substantive changes to these factors since the 2024 Re-evaluation that have the potential to result in a new significant impact not already evaluated in the 2021 EA/FONSI or subsequent re-evaluations.

S. Stormwater Impacts

Have there been any changes to the following since the approval of the original environmental document:	YES	NO
• The project's involvement with a public or private drinking water source?	☐	☒
• The project's effect on discharges of stormwater into waters of state?	☐	☒
• The project's effect on a WisDOT Phase I or II stormwater management area?	☐	☒
• Changes to the stormwater management methodologies resulting from project scope or design changes?	☐	☒

Describe changes, including any changes to previously proposed mitigation and/or environmental commitments:

The Project's preliminary design documented in the 2021 EA/FONSI did not include specific locations for stormwater facilities or detail methods to properly drain the roadway and meet water quality requirements for stormwater. Design advancement since the 2021 EA/FONSI has implemented corridor-wide drainage and stormwater treatment facilities, including stormwater ponds and roadside ditches to convey stormwater. The 2024 Re-evaluation documented that final design had determined the location and configuration of stormwater ponds throughout the Project corridor. A corridor-wide water quality report was submitted to WDNR in August of 2023 for review and issuance of Clean Water Act Section 401 Water Quality Certification under the state's regulatory authority, with Water Quality Certification for the Project issued on December 4, 2023.

Since the 2024 Re-evaluation final design for stormwater facilities has continued, but no substantive changes have been made to the location or design of stormwater ponds; **Appendix A** shows proposed locations of stormwater ponds under the current Project design. At the request of the Town of Little Chute, WisDOT completed design and analyzed impacts of minor changes to grading around the Little Chute Ponds. These changes are not required for mitigating project impacts or for total suspended solids (TSS) reduction, and the Town of Little Chute has not currently requested for the changes to be implemented.

WisDOT coordinated with the Outagamie County Drainage Board regarding modifications to an existing culvert in the Vandenbroek Drainage District, and WisDOT representatives attended a public hearing on December 2, 2025, regarding the change. On May 29, 2026, the Wisconsin Department of Agriculture, Trade and Consumer Protection (DATCP) conditionally approved the requested culvert modification (**Appendix D**). WisDOT has met water quality requirements for total suspended solids (TSS) reduction of 40% for all projects areas with existing roadway having capacity expansion, and 80% TSS reduction for areas of new roadway on a new alignment. Brown County will complete water quality requirements related to stormwater design for portions of the South Bridge Connector. There have been no substantive changes to these factors since the 2024 Re-evaluation that have the potential to result in a new significant impact not already evaluated in the 2021 EA/FONSI or subsequent re-evaluations.

T. Construction Impacts	YES	NO
Have there been any changes to the following since the approval of the original environmental document:		
• Temporary degradation of water quality?	☐	☒
• Temporary wetland impacts?	☒	☐
• Temporary stream diversion?	☒	☐
• Temporary degradation of air quality?	☐	☒
• Temporary delays and detours of traffic?	☒	☐
• Temporary impacts on businesses?	☐	☒
• Temporary noise impacts?	☐	☒
• Other construction impacts?	☐	☒

Describe changes, including any changes to previously proposed mitigation and/or environmental commitments:

Changes to temporary impacts to wetlands under the current design as compared to what was proposed in the 2021 EA/FONSI are detailed in the wetland impact table included in the Wetland Factor Sheet and individual wetlands are labeled in the **Appendix A** map set. Temporary impacts to water quality and wetlands would be managed through the Transportation Construction General Permit issued by WDNR for each construction package. In addition, an Erosion Control Implementation Plan (ECIP) will be submitted by contractors for each construction project for review and approval by WisDOT and WDNR. Construction site erosion control would minimize temporary impacts to water quality, wetlands and waterways. All project areas with ground disturbing activities would be inspected for compliance with the project erosion control plan on a weekly basis and after any ½ inch or greater rain event within a 24-hour period. All project areas, including areas of temporary wetland impact would meet 70% vegetative cover permit requirements prior to removal of temporary erosion control devices and closure of permit coverage.

Temporary stream diversion will be managed through construction means and methods including best practices for work in waterways. Site specific plans involving temporary diversion of waterways would be submitted via the contractor's ECIP and reviewed and approved by WDNR and WisDOT on a project basis for structures in or near waterways. Dewatering would follow WDNR technical standard 1061 for pit/trench dewatering and WisDOT standard construction details.

There have been no changes to the temporary degradation of air quality since the 2021 EA/FONSI that would result from implementing the current Project design. The potential impact to construction air quality would be reduced through WisDOT special provisions requiring operation of motorized equipment in compliance with all applicable local, state, and federal laws and regulations. All motorized construction equipment would be required to have mufflers manufactured in accordance with the equipment manufacturer's specifications or a system of equivalent noise-reducing capacity. WisDOT also requires that mufflers and exhaust systems be maintained in good operating condition, free of leaks and holes. Restrictions would also be implemented to limit truck idling time to minimize temporary air quality impacts from construction equipment.

A Transportation Management Plan (TMP) will be prepared for each project on the corridor. Detour routes are provided in case of full roadway closures. Traffic analysis has been completed for intersections with impacts due to detoured traffic. Mitigation measures such as signal retiming, restriping of the intersection and/or turn lanes will be implemented. A Queue Warning System will be implemented as a safety measure for the whole I-41 corridor to make drivers aware of queue times on the interstate mainline and ramps. Business Access routes are planned for affected business in each project area, and truck detour routes are also planned for each project and will be identified based on weight

requirements and ordinances for local road weight and truck restrictions. The TMP planning effort includes coordination with local municipalities and metropolitan planning organizations, law enforcement agencies, emergency responders, transit agencies, schools and major employers to minimize temporary traffic detour impacts.

The 2021 EA/FONSI reported that noise would be generated by construction equipment used to reconstruct the roads as part of the I-41 project and there is no proposed change to construction noise that would result from implementing the current Project design. Typical construction equipment includes dump trucks, graders, cranes, bulldozers, pile-driving equipment and pavement construction equipment. Noise generated by the construction equipment would vary greatly depending on the equipment type and model, mode, duration of operation and specific type of work effort. Typical noise levels may occur in the 75 to 95 decibel (dB) range (at 50 feet). Adverse impacts related to construction noise are anticipated to be localized, temporary and transient. Construction noise would also be minimized during evening hours. No known changes to construction methods that affect the generation of noise have occurred since the 2021 EA/FONSI. WisDOT's Facilities Development Manual Procedure 23-40-1 is adequate to control construction noise and to minimize adverse noise effects resulting from the construction phase of the project. WisDOT Standard Specifications 107.8(6) and 108.7.1 have been included in all proposed construction contracts to control construction noise.

There have been no substantive changes to these factors since the 2024 Re-evaluation that have the potential to result in a new significant impact not already evaluated in the 2021 EA/FONSI or subsequent re-evaluations.

U. Permits and Authorizations	YES	NO
Are permits or other authorizations following environmental documentation approval such as a Section 404 permits for work in waters of the United States required for work in the study area?	☒	☐
If 'YES', have there been any changes to the status of permits and authorizations since the approval of the original environmental document?	☒	☐

Describe changes:

The 2024 Re-evaluation documented WisDOT's progress in obtaining permits and approvals necessary to proceed with construction, including Section 401, Section 404, Transportation Construction General Permits (TCGPs), Section 7 and other approvals; see 2024 Re-evaluation for additional details.

Since the approval of the 2024 Re-evaluation in February 2024, WisDOT has obtained updated Section 7 concurrence from USFWS and two MBTA depredation permits for bridge work. WisDOT has also obtained TCGP approvals and final concurrence from WDNR for the following construction projects:

- Early Fill and South Bridge Connector Frontage Roads, ID 1130-68-81, approved 2/27/2024
- I-41 Mainline, WIS 96 – Railroad Bridge, ID 1130-64-71, approved 6/3/2024
- I-41 Mainline, Railroad Bridge – Lynndale Dr, ID 1130-64-72, approved 6/3/2024
- I-41 Mainline, Railroad Structures, ID 1130-64-87, approved 6/3/2024
- Holland Rd Overpass, ID 1130-66-80, approved 6/6/2024
- Vandenbroek Rd Overpass, ID 1130-66-81, approved 6/6/2024
- Hyland Rd (County J) Interchange, ID 1130-66-78, approved 6/11/2024
- Ballard Rd (County E) Interchange, ID 1130-65-76, approved 9/10/2024
- I-41 Queue Warning System, ID 1130-63-72, approved 10/17/24
- I-41 Mainline Transportation Management Plan, County JJ – Miners Way, ID 1130-67-71, approved 10/24/24
- Buchanan St Overpass, ID 1130-66-82, approved 12/18/2024
- South Bridge Connector Interchange, ID 1130-68-77, approved 1/15/2025
- I-41 Mainline Reconstruct, County JJ – Miners Way, County U, IDs 1130-67-72, -76 & -86, approved 2/11/2025
- French Rd Overpass, ID 1130-65-81, approved 6/18/2025
- I-41 Mainline, Lynndale Dr – Meade St, ID 1130-64-73, approved 10/6/2025
- Richmond St (WIS 47) Interchange, ID 1130-64-77, approved 10/6/2025
- I-41 Mainline, Meade St – Holland Rd, ID 1130-65-71, -72 & -73, approved 2/27/2026
- WIS 441 Mainline, Northland Ave to I-41, ID 1130-65-74, approved 2/27/2026
- WIS 441 Interchange, Fill and Structures, ID 1130-65-78, approved 2/27/2026
- I-41 Mainline, Holland Rd – County JJ, ID1130-66-71 & -72, approved 4/28/26
- WIS 55 Interchange, ID 1130-66-77, approved 4/28/26
- Maloney Rd, ID 1130-66-84, approved 4/28/26

There have been no substantive changes to these factors since the 2024 Re-evaluation that have the potential to result in a new significant impact not already evaluated in the 2021 EA/FONSI or subsequent re-evaluations.

6. COMMENTS AND COORDINATION CONDUCTED	YES	NO
Has public and/or agency coordination occurred since the approval of the original environmental document?	☒	☐

Describe all outreach and coordination efforts conducted for this project since approval of the original environmental document. Discuss pertinent issues raised by the public and other agencies. Attach applicable correspondence and responses. If no additional public involvement was conducted, explain why.

After the completion of the 2021 EA/FONSI, WisDOT conducted additional public involvement and agency coordination to support the updated analyses documented in the 2024 Re-evaluation (see 2024 Re-evaluation for details). Since the completion of the 2024 Re-evaluation, WisDOT has continued agency coordination as necessary, including with WDNR regarding updates to wetland and stream impacts and final concurrence for upcoming construction projects, and with USFWS to update Section 7 informal consultation.

WisDOT presented information on community sensitive design (CSD) options to the public and local officials at several meetings since the 2024 Re-evaluation, including Local Officials Meetings on October 10, 2024, September 25, 2025, and February 24, 2026, and Public Involvement Meetings on January 28 and 29, 2025. CSD topics presented included landscaping, use of form liner, structure staining, noise barriers aesthetic treatments and pending CSD policy changes. WisDOT also coordinated with residents and businesses near the WIS 47/Richmond Street interchange to assess concerns about the upcoming closure and detours during construction, and with the Outagamie County Drainage Board and the public (at a public hearing) regarding modifications to an existing culvert. See the corresponding sections above for additional details on public and agency coordination completed in support of this 2026 Re-evaluation.

WisDOT will continue public and agency coordination as necessary as additional sections of the project complete final design and advance through construction. In addition to public and agency outreach relevant to the design changes, WisDOT is also hosting regular public involvement, local official and business meetings to update stakeholders on construction status and schedule, and the project maintains active email/mail distribution lists, a project website and a social media presence. Overall, there have been no substantive changes arising from public and agency coordination since the 2024 Re-evaluation that have the potential to result in a new significant impact not already evaluated in the 2021 EA/FONSI or subsequent re-evaluations.

7. ENVIRONMENTAL RE-EVALUATION DETERMINATION	YES	NO
The supporting information included in this re-evaluation indicates that the original approved environmental decision remains valid.	☒	☐
The changes in the project scope, identification of new significant environmental impacts not previously evaluated, changes to environmental commitments or public controversy identified through the supporting information included in this re-evaluation indicate a new or supplemental environmental document is required. [If 'Yes', consultation with the Region Environmental Coordinator, Local Roads Program Management Consultant or BTS-EPDS Region Liaison and FHWA, as appropriate, is required.]	☐	☒

RE-EVALUATION IMPACT COMPARISON MATRIX

All estimates in the 'Original Document' column including costs are based on conditions described in the original, approved document at the time of preparation in the year of expenditure (YOE). All estimates in the 'Re-evaluation' column, including costs, are based on present conditions described in this document at the time of preparation in the year of expenditure (YOE). Additional agency or public involvement may change these estimates in the future. Attach the Alternatives Comparison Matrix or other summary of impacts table from the original environmental document as an appendix. If other re-evaluations have been done of the original environmental, also attach all previously completed Re-evaluation Impact Comparison Matrixes.

PROJECT PARAMETERS	Unit of Measure	Original 2021 Document	2024 Re-evaluation	This (2026) Re-evaluation	Change Since Original
Year of Expenditure	Year	2024	2024-2027	2024-2029	N/A
Project Length	Miles	23	23	23	No
PRELIMINARY COST ESTIMATE (YOE)					
Construction	Million $	$1,100	$944.1	$1,065.6	-$34.4
Real Estate	Million $	$15	$18.6	$52.5	+$37.5
TOTAL	Million $	$1,250	$1,194	$1,245	-$5
LAND CONVERSIONS					
Total Area Converted to ROW	Acres	93	131.5	90.1	-2.9
REAL ESTATE					
Number of Farms Affected	Number	33	48	47	+14
Total Area Required from Farm Operations	Acres	115	78	76.2	-38.8
AIS Required		☒ Yes ☐ No	☐ Yes ☒ No	☐ Yes ☒ No	New AIS/ Amendment Not Required
Farmland Rating	Score	<60	<60	<60	No
Total Buildings Required	Number	3	3	3	0
Housing Units Required	Number	3	3	3	0
Commercial Units Required	Number	0	0	0	0
Other Buildings or Structures Required	Number & Type	0	0	0	0
ENVIRONMENTAL FACTORS					
Reasonably Foreseeable Effects		☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	No
Adverse Impacts to any Demographic Group(s)		☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	No*
National Register Listed or Eligible Historic Structures Impacted or Potentially Impacted	Number	0	0	0	No
National Register Listed or Eligible Archeological Sites Impacted or Potentially Impacted	Number	0	0	0	No
106 MOA Required		☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	No
Burial Site Protection *(authorization required)*		☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	No
Section 4(f) Evaluation Required		☒ Yes ☐ No	☒ Yes ☐ No	☒ Yes ☐ No	No
Section 6(f) Land Conversion Required		☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	No
Floodplain Impacts		☒ Yes ☐ No	☒ Yes ☐ No	☒ Yes ☐ No	No
Unique Upland Habitat Identified		☐ Yes ☒ No	☐ Yes ☒ No	☐ Yes ☒ No	No
Total Wetlands Filled	Acres	38.9	76.2	76.1	+37.2
Stream Crossings	Number	22	23	22	0
Threatened/Endangered Species		☒ Yes ☐ No	☒ Yes ☐ No	☒ Yes ☐ No	Updated ranges and species
Noise Analysis Required		☒ Yes ☐ No	☒ Yes ☐ No	☒ Yes ☐ No	No
Total Receptors Impacted	Number	133 (representative)	1,313	1,313	N/A
Contaminated Sites	Number	168 total sites 150 sites with no further action needed	168 total sites 153 sites with no further action needed	173 total sites 165 sites with no further action needed	+5 total sites (from splitting previously grouped sites) 8 sites with remaining action

*Note that the matrix prompt in the 2024 Re-evaluation addressed only population presence. Reporting in this updated matrix addresses the level of impact. No changes have occurred.

UPDATED ENVIRONMENTAL COMMITMENTS DOCUMENT

Complete this page and attach a copy to the revised Design Study Report and the PS&E submittal package if project changes have resulted in changes or additions to the environmental commitments identified in the original approved environmental document. All original commitments that remain applicable along with any updated or added commitments should be included in the 'Commitment' column. Indicate which commitments were included in the original document and which commitments are new or updated.

Revisions to the Environmental Commitments provided in the 2024 Re-evaluation are Highlighted in Cyan

Environmental Factor	2021 EA/FONSI Commitments	Current Proposed Design Commitments
General Economics	WisDOT will develop and implement a TMP to ensure reasonably convenient access to all residences, businesses, farm parcels, community services, and local roads during construction. Traffic flow will be maintained during construction to the maximum extent possible. Work will be staged to minimize disruption during the construction period. WisDOT will look into enhanced transit service to mitigate anticipated congestion during construction. WisDOT's Project Manager will ensure fulfillment of this commitment.	No change to commitment. TMP is being developed for each project let package and commitment would be fulfilled. WisDOT's Project Manager will ensure fulfillment of this commitment.
Business	WisDOT will develop and implement a TMP to ensure reasonably convenient access to all residences, businesses, farm parcels, community services, and local roads during construction. Traffic flow will be maintained during construction to the maximum extent possible. Work will be staged to minimize disruption during the construction period. WisDOT will look into enhanced transit service to mitigate anticipated congestion during construction. WisDOT's Project Manager will ensure fulfillment of this commitment.	No change to commitment. TMP is being developed for each project let package and commitment would be fulfilled. WisDOT's Project Manager will ensure fulfillment of this commitment.
Agriculture	The following management and design practices will be implemented to help minimize the agricultural impacts of the Build Alternatives: • Evaluate options during the design phase to minimize farm severances. • Maintain access to farm fields. • Maintain existing surface and subsurface drainage. WisDOT's Project Manager will ensure fulfillment of this commitment.	No change to commitment. Minimization of severances to farms has been implemented through the design phases of the project. Access to farm fields would be maintained and the TMP would address this during construction and commitment would be fulfilled. Existing surface and subsurface drainage would be maintained during construction and WisDOT's Project Manager will ensure fulfillment of this commitment. DATCP provided release from AIS preparation for new agricultural parcels being impacted and changes to impacts to parcels covered under previous coordination.
Community or Residential	WisDOT will develop and implement a TMP to ensure access to residences and community facilities would be maintained during construction. To minimize delays to emergency vehicles, WisDOT will coordinate construction activities, staging, and traffic management plans with local fire, police, and emergency rescue districts. WisDOT's Project Manager will ensure fulfillment of this commitment.	No change to commitment. TMP is under development per construction let package as well as detour plans, staging and traffic control.

	The acquisition and relocation program will be conducted in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 as amended; 49 CFR Part 24; Wisconsin Statutes s. 32.19 – 32.27; and Wisconsin Administrative Code Adm 92. Relocation advisory assistance, benefits, and other resources will be made available to all relocates without discrimination. There are no known age, ethnic, handicapped, or minority characteristics that will require special consideration for any displacement. No unusual requirements are expected that would preclude successful relocation. WisDOT's Project Manager will ensure fulfillment of this commitment.	Residential relocations have been completed. Partial acquisitions required for parcels adjacent to the corridor are in progress. WisDOT's Project Manager will ensure fulfillment of these commitments.
Reasonably Foreseeable Effects	(Included in 2021 EA/FONSI as Indirect Effects and Cumulative Effects Factors) No special provision or supplemental commitments required.	No special provision or supplemental commitments required.
Demographics	(Included in 2021 EA/FONSI as Environmental Justice Factor) WisDOT will continue to provide project materials in Spanish and Hmong during additional design phases and construction. WisDOT will also provide project materials and information for those who cannot access project information via the internet. Coordination will continue with adjacent municipalities, landowners and residents during design and construction to refine mitigation measures for issues including stormwater management, noise walls, and traffic management. WisDOT's Project Manager will ensure fulfillment of this commitment.	No change to commitment. Commitment has been fulfilled through ongoing public information and outreach. Coordination to continue through construction. WisDOT's Project Manager will ensure fulfillment of this commitment.
Historic Resources	No special provision or supplemental commitments required.	No special provision or supplemental commitments required.
Archaeological / Burial Sites	No special provision or supplemental commitments required.	If additional grading at the Little Chute Ponds proceeds to construction, WisDOT will ensure completion of any necessary archaeological surveys.
Tribal Coordination / Consultation	No special provision or supplemental commitments required.	No special provision or supplemental commitments required.
Section 4(f) and 6(f) or Other Unique Areas	Resources with 4(f) de minimis impacts include Outagamie County's County Forest and Town of Grand Chute's Prairie Hill Park. WisDOT will pay fair-market value of the land and improvement taken in accordance with the Uniform Act. WisDOT's Project Manager will ensure fulfillment of this commitment. The mountain bike trails at Prairie Hill Park that would be temporarily impacted during construction would be reestablished after construction. Prior to construction, signage would be posted alerting trail users of the upcoming closure and expected duration of the closure. WisDOT will coordinate with the Town of Grand Chute and	A Section 4(f) de minimis determination was added to the project for proposed impacts to the Preserve Trail on the east side of the South Bridge Connector interchange. Permanent fee acquisition would be used to relocate about 700 feet of the Preserve Trail and dedicated to the city of De Pere when construction is complete. Trees located within the current trail parcel that cannot be avoided will be replaced within the new trail right of way and a trailhead sign would be moved to a new location. When the project is complete, 0.14 acres of land

	Northeast Wisconsin Trails group regarding trail closures during construction. A detour will be required for the Ballard Road Trail and would last several months. A signed detour route will be established for the trail. WisDOT's Project Manager will ensure fulfillment of this commitment.	will be dedicated to the city of De Pere as parkland. WisDOT's Project Manager will ensure fulfillment of this commitment. No changes to other Section 4(f) impacts detailed in the 2021 EA/FONSI or associated commitments.
Aesthetics	Measures to minimize adverse aesthetic impacts will include roadway design features to blend existing landscape, planting, and natural vegetation on the cut and fill slopes. The types of plantings will be determined during final design, and WisDOT will preserve the existing vegetation as much as possible. WisDOT's Project Manager will ensure fulfillment of this commitment.	No change to commitment. Commitments have been completed for the design phase of the project and coordination with municipalities is ongoing for construction delivery of landscaping, plantings and natural vegetation. WisDOT's Project Manager will ensure fulfillment of this commitment.
Wetlands	Where feasible, ditches delineated as wetland adjacent to I-41 that are impacted will be reconstructed adjacent to the new roadway. For wetlands that cannot be avoided, WisDOT will obtain a Section 404 permit (likely an Individual Permit) from the USACE and mitigate the wetland impacts according to federal and state regulations. Wetlands will be mitigated using a Wetland Mitigation Bank. WisDOT's Regional Environmental Coordinator will ensure fulfillment of this commitment.	401 Water Quality Certification for the project was issued by WDNR on December 4, 2023, and a Section 404 Individual Permit was issued by USACE on February 2, 2024. Offsite mitigation for permanent wetland impacts has been fulfilled via credit debits from WisDOT wetland mitigation banks in the same watershed as project impacts. Prior to project closeout, in consultation with WDNR and USACE, WisDOT will transition the project to using the updated wetland types and mitigation ratios required under the 2025 update to the WisDOT-WDNR Memorandum of Understanding on Compensatory Mitigation for Unavoidable Wetland Losses Resulting from State Transportation Activities and Wetland Mitigation Guidelines Version 2.
Rivers, Streams, and Floodplains	In some locations, surface waters will be relocated adjacent to the new roadway. Relocation of surface waters will be designed and constructed per guidance contained in FDM 13-30 Channels and Road Ditches and from regulatory resource agencies, DNR and USACE. Relocated surface waters will mimic the features and aquatic and hydrologic functions of the original locations. They will have a similar cross section, length, elevation, hydraulic capacity, slope and alignment as their original locations. WisDOT will obtain Section 401 water quality certification from DNR and a Section 404 permit (likely an Individual Permit) from USACE for impacts to surface water resources and will continue coordination with USACE and DNR to determine appropriate mitigation. To minimize potential impacts to fish species during the spawning period, in-stream construction in tributaries to Mud Creek and Apple Creek in Outagamie County will be restricted between March 1 and June 15 and in Apple Creek, Hemlock Creek, and tributaries to Ashwaubenon Creek between March 1 and June 15. Appropriate erosion control BMP's must be utilized during construction. WisDOT's Project Manager will ensure fulfillment of this commitment.	Relocated stream channels have been designed to have similar cross section, length, elevation, hydraulic capacity. 401 Water Quality Certification for the project was issued by WDNR on December 4, 2023, and a Section 404 Individual Permit was issued by USACE on February 2, 2024. In Outagamie County, portions of Mud Creek tributaries would avoid in-stream construction between March 1 and May 31 and portions of Apple Creek tributaries would avoid in-stream construction between March 1 and May 15 at the direction of WDNR. All other in-stream work for corridor projects will be avoided between March 1 and June 15. This is documented in project special provisions for each project area with work in a stream channel. Hydraulic analysis was completed for final design of the project for all structures in a regulatory floodplain or any project area with encroachment into regulatory floodplain within WisDOT's

	Design has been and will continue to be developed to minimize impacts to floodplains. The need for compensatory storage will be determined once hydrology and hydraulics analyses are conducted. Because there is no history of the floodplain overtopping the existing roadways, it is anticipated that the proposed design can provide the roadway clearance necessary to avoid an increase in the regional flood height. Therefore, because there is a low risk of the proposed design causing an increase in the regional flood height, the hydrology and hydraulic analysis will be completed at a later design stage and will be consistent with DNR Floodplain Management NR 116 criteria and 23 CFR 650 Subpart A. Design of the crossings will aim to convey the regional flood without overtopping the road and not cause an increase in regional flood elevation. Coordination will occur with local floodplain zoning authorities (Brown and Outagamie Counties) if there will be a change in flood elevation. WisDOT's Regional Environmental Coordinator will ensure fulfillment of this commitment.	construction limits. No changes to regulatory floodplain would result from the proposed project. Compensatory storage was included as mitigation at S-D-3, east of Meade Street. Coordination with local floodplain zoning authorities has been completed for the project. Floodplain analysis for the Brown County portion of the South Bridge Connector will be completed as part of final design. Any required permits or approvals for portions of the project outside of the WisDOT project limits will be obtained by Brown County. Regulatory floodplains in these areas are associated with Hemlock Creek and Ashwaubenon Creek. WisDOT's Project Manager will ensure fulfillment of these commitments.
Lakes or other Open Water	No special provision or supplemental commitments required.	One existing private stormwater pond would be impacted by the project east of the WIS 441 interchange. WisDOT would acquire a portion of the pond that is below a structure of the new system interchange. The pond would be widened to the north to replace the existing capacity of the pond. Excavation of accumulated sediment from the pond would adhere to NR 528 standards.
Groundwater, Wells and Springs	No special provision or supplemental commitments required.	No special provision or supplemental commitments required.
Upland Wildlife and Habitat	No special provision or supplemental commitments required.	No special provision or supplemental commitments required.
Coastal Zones	No special provision or supplemental commitments required.	No special provision or supplemental commitments required.
Threatened and Endangered Species	No special provision or supplemental commitments required for federal species or state-listed species in Brown County. One state-threatened plant in Outagamie County may be impacted by the project. As design continues, WisDOT will continue conversations with DNR to explore ways to avoid or minimize impact to the plant. If impact to the plant is unavoidable, WisDOT will work through the incidental take process with DNR and relocate the plant prior to construction to a location agreed upon with DNR. To minimize impacts to populations of the state-listed plant near but outside of the reconstruction limits, WisDOT will aim to maintain a 10-20' buffer of trees between the limits of disturbance and the plant. To avoid impact during construction, WisDOT will clearly mark the	Evidence of bats was found on the I-41 northbound and southbound bridges over Apple Creek and the I-41 southbound bridge over the Soo Line Railroad. These three bridges will be demolished during the hibernation/non-active season (November 1 – March 31). If demolition during the non-active season is not possible, exclusion measures will be implemented to present bats from using the bridge structure prior to and during the active season (April 1 – October 31). Suitable roosting habitat would be maintained within the bridge once construction / replacement is complete. **Avoidance and Minimization Measures (AMMs)** for Northern Long Eared Bat (NLEB) and Tri Colored Bat (TCB) include: **General AMM 1.** Ensure all operators, employees, and contractors working in areas of known or presumed bat habitat are aware of all

	limits of disturbance to protect the plant and its habitat from construction equipment.	FHWA and WisDOT environmental commitments, including all applicable AMMs. **Lighting AMM 1.** Direct temporary lighting away from suitable habitat during the active season. **Lighting AMM 2.** When installing new or replacing existing permanent lights, use downward facing, full cut-off lens lights (with same intensity or less for replacement lighting); or for those transportation agencies using the BUG (Backlight, Uplight, and Glare) system developed by the Illuminating Engineering Society the goal is to be as close to 0 for all three ratings with a priority of "uplight" of 0 and "backlight" as low as practicable. Tree Removal AMM 1. Modify all phases/aspects of the Project (e.g., temporary work areas, alignments) to the extent practicable to avoid tree removal in excess of what is required to implement the Project safely. **Tree Removal AMM 2.** Apply time of year restrictions for tree removal (when bats are not likely to be present), November 1 to March 31 of the calendar year. **Tree Removal AMM 3.** Ensure tree removal is limited to that specified in Project plans and ensure that contractors understand clearing limits and how they are marked in the field (e.g., install bright colored flagging/fencing prior to any tree clearing to ensure contractors stay within clearing limits). **Bridge AMM 2**. For all other bridges, if bridge assessment or P/A surveys suggest presence of a small number of bats (<5 – not a colony), and work is conducted during the active season, the following types of bridge work can generally be conducted with the presence of bats: • Above deck work where construction equipment or materials do not extend to the underside of deck where bats may be located (e.g., materials that may drip down to underside of deck) and does not include percussives (vibration) or noise levels above general traffic (e.g., road line painting, wing-wall work). Below deck work that is conducted away from roosting bats and does not involve percussives or noise level above general traffic (e.g., wing-wall work, some abutment, beam end, scour, or pier repair). • Any other bridge repair, retrofit, maintenance, and/or rehabilitation (which may include activities with percussives) conducted in the evening while the bats are feeding, starting one hour after sunset, and ending one hour before daylight excluding the hours between 10 p.m. and midnight and keep the light localized.

		Reasonable and Prudent Measures (RPMs) the following RPMs are necessary and appropriate to minimize impacts of incidental take of bats: 1. WisDOT will ensure that all of the AMMs are implemented. 1.1 Notify contractors and construction staff of conservation measures and ensure compliance with these measures. 1.2 Bridge/culvert surveys for bats will be conducted a minimum of 24 months before construction activities begin. Construction activities should not begin until after appropriate agencies have been notified of survey results (if not already on-site during the survey). 1.3 Only individuals with authorization to capture bats will capture and handle bats. 1.4 If any AMMs cannot be implemented or require modification, contact the WisDOT project manager for further discussion before proceeding with work. 2. WisDOT and its contractors will ensure that appropriate agencies are notified of construction initiation and completion dates, as well as any unforeseen circumstances. 2.1 Notify the current WisDOT Regional Environmental Coordinator (REC) via email when construction is expected to begin. 2.2 Provide contact information for current WisDOT REC to appropriate on-site staff so WisDOT can immediately notify agencies of any unforeseen or emergency circumstances or request clarification regarding conservation measures or terms and conditions. 2.3 Notify current WisDOT REC via email when construction is complete. 3. Should a dead or injured bat be found during project activities; all contractors will ensure that construction activities cease immediately and that the WisDOT project manager is notified. 3.1 Cease all construction activities if a dead or injured bat is found during project activities and immediately notify the WisDOT project manager and current WisDOT REC via email 3.2 Contactors should be aware that if dead or injured bats are found additional conservation measures to prevent additional injury or mortality throughout the remaining project activities may be required on a project specific basis.

		WisDOT obtained an Incidental Take Authorization from WDNR in May of 2023 and has implemented the conservation plan for the state-listed plant species in accordance with the Authorization which included moving plants that could not be avoided to locations outside of the project area. Efforts to minimize impacts to plants outside of the construction limits should be included in project special provisions for the construction let package in this area, including installing orange construction fencing in areas where the plant is known to be present adjacent to the project area and making contractors aware that areas should not be disturbed. WisDOT has completed their 2-year monitoring commitment for one state-listed plant species. The NHI review will be renewed annually prior to construction to verify there are no new records of eagle nests within 660-feet of the project footprint. If new nests are identified between the time of the Biological Opinion and construction, nest avoidance measures will be implemented, which includes a 660-foot buffer if project activity is visible from the nest, or a 330-foot buffer if project activity is not visible from the nest. If work is to be done within the buffer area, then it is recommended to take place outside of the nesting season (September – December). On September 14, 2022, the U.S. Fish and Wildlife Service announced a proposal to list the Tricolored Bat (*Perimyotis subflavus*) as endangered under the Endangered Species Act. If listed, WisDOT will resolve Section 7 prior to let as appropriate. Construction activities for this project will not take place until WisDOT (in coordination with our lead federal agency) satisfies Endangered Species Act compliance for the TCB. **Monarch Butterfly** On December 12, 2024, the U.S. Fish and Wildlife Service announced a proposal to list the Monarch Butterfly (*Danaus plexippus*) as threatened with a 4(d)rule under the Endangered Species Act. If listed, WisDOT will resolve Section 7 prior to let, as appropriate. Construction activities for the project would not take place until WisDOT (in coordination with FHWA) satisfies Endangered Species Act compliance for the Monarch. **Rusty Patched Bumble Bee** **Avoidance and Minimization Measures** for the RPBB include:

		1. WisDOT has agreed to continue maintenance mowing and that areas already stripped of vegetation will deter feeding and nesting and will encourage that project activities avoid bees during sensitive periods, such as nesting and foraging. WisDOT will initiate sufficient ground disturbance to remove nesting and foraging habitat during the overwintering season, prior to April 15, 2026, in an area associated with project ID 1130-64-73. If RPBB critical habitat is designated, construction activities for affected construction let projects will not proceed until WisDOT, in coordination with FHWA, satisfies ESA compliance for the RPBB critical habitat. On June 1, 2026, USFWS published a final rule designating critical habitat for the RPBB, effective on July 1, 2026. The I-41 Project does not overlap the RPBB critical habitat. WisDOT's Project Manager will ensure fulfillment of this commitment.
Air Quality	The project area is in attainment for all transportation related criteria pollutants. The project would have low potential of mobile source air toxics (MSAT) effects (Tier II). Additional mitigation for this project category is not required according to FHWA's 2016 Updated Interim Guidance on Mobile Source Air Toxic Analysis in NEPA Documents. According to the FHWA's guidance, the project is considered to have low potential MSAT effects because it serves to improve operations of a highway where the AADT is projected to be under 140,000 to 150,000 in the design year or without creating a facility that is likely to meaningfully increase MSAT emissions. See the Air Quality Factor Sheet and its appendixes.	No change to commitment. Project remains consistent with 2023 update to FHWA MSATs guidance. (Commitment was omitted from the 2024 Re-Evaluation)
Construction Stage Sound Quality	Construction sound impacts may occur. WisDOT Standard Specifications 107.8(6) and 108.7.1 would apply. See Factor Sheet for more information.	No change to commitment. (Commitment was omitted from the 2024 Re-Evaluation)
Traffic Noise	This project required a detailed noise analysis. WisDOT anticipates some noise impacts. The future noise level at several receptors would approach or exceed the Noise Abatement Criterion with the Preferred Alternative. At several locations along I-41 a noise barrier was deemed feasible and reasonable for traffic noise mitigation. See attached Factor Sheet for more information.	Noise analyses were updated after the 2021 EA/FONSI and 2024 Re-evaluation. 9 barriers have been determined feasible, reasonable and likely to be incorporated into the project. WisDOT's Project Manager will ensure fulfillment of this commitment. (Commitment was omitted from the 2024 Re-Evaluation)
Hazardous Substances or Contamination	Prior to acquiring properties with known contamination, WisDOT may conduct additional levels of assessment to determine if further action is needed to evaluate impacts to the property's value and or/proposed construction. Any further assessment and remedial actions would be subject to the approval of the appropriate regulatory agencies, WisDOT, and FHWA, as relevant. WisDOT may also conduct additional assessment of fly ash embankments that will be impacted.	Current status of 173 sites currently identified in the project corridor: • 165 sites with no additional action needed. • 2 sites with additional investigation needed near the County S interchange. • 6 sites with additional obligations/coordination needed (including four fly ash locations to be coordinated with WDNR). Remediation and waste management practices to be included in the project special provisions for areas where existing, known

	During the project's real estate acquisition phase, WisDOT will survey all buildings and structures that need to be demolished to determine whether asbestos or lead-based paint is present. All appropriate engineering and regulatory controls will be followed during the handling and disposal of asbestos maintaining materials and lead-based paint. Standard special provision 107-125 shall be included in the construction documents, and the contractor will be responsible for completion of the Notification of Demolition and/or Renovation (DNR form 4500- 113), if required. WisDOT's Project Manager will ensure fulfillment of this commitment.	contamination cannot be avoided would be determined prior to construction activities. WisDOT would coordinate with WDNR for excavation, handling and disposal of any contaminated soil or groundwater to meet state and federal law. Standard special provision 203-005 with bid item 203.0201.s would be included in the construction documents, and the contractor would be responsible for completion of the Notification of Demolition and/or Renovation (DNR form 4500-113), as required. WisDOT's Project Manager will ensure fulfillment of these commitments.
Stormwater	Stormwater management will follow WisDOT/DNR TRANS 401, DNR 151/216, and TS4 requirements. Several best management practice options are under consideration, including, but are not limited to, grass swales, vegetative filter strips, street cleaning practices, sumped inlets (catch basins), biofilters, and detention ponds. These will be evaluated to provide an appropriate measure to manage additional peak flows and total suspended solids loadings from increased impervious surfaces. WisDOT's Regional Environmental Coordinator will ensure fulfillment of this commitment	No change to commitment. Stormwater management would follow WisDOT/DNR TRANS 401, DNR 151/216, and TS4 requirements and these have been detailed in the 401 Water Quality Certification (WQC) submittal. WDNR issued the 401 WQC for the project on December 4, 2023, which noted the phased nature of the upcoming let packages and construction activities, and noted conditions to be met by WisDOT to remain in compliance with the WQC. WisDOT's Project Manager will ensure fulfillment of this commitment.
Erosion Control	No special provision or supplemental commitments required.	No special provision or supplemental commitments required.
Migratory Birds	None	WisDOT will ensure measures to prevent the establishment of migratory bird nests on structures by implementing guidance outlined in Migratory Bird Treaty Act Compliance Guide (wisconsindot.gov). WisDOT obtained depredation permits for work on two structures and will coordinate with USFWS on incidental take or take approved under the FAST Act, when necessary for future construction projects. WisDOT's Project Manager will ensure fulfillment of this commitment.

List of Figures

Figure 1 2021 EA/FONSI Project Location and Limits
Figure 2 2021 EA/FONSI South Bridge Connector Tier 1 and Tier 2 Relationship

List of Factor Sheets

Wetland Factor Sheet (with updated Wetland Impact Tables)
Surface Water Factor Sheet (with updated Waterway Impact Tables)
Threatened, Endangered, and Protected Resources Factor Sheet

List of Appendices

Appendix A Map Set for 2026 Re-evaluation and Current Design
Appendix B State Historic Preservation Office (SHPO) and Tribal Coordination
Appendix C Threatened and Endangered Species Coordination
Appendix D DATCP Coordination