

Dresbach Bridge (Bridge #5900) Project

SP 8503-46

Is the Minnesota Department of Transportation (Mn/DOT) following the National Environmental Policy Act (NEPA) process for the Dresbach Bridge crossing?

Yes. Mn/DOT has held multiple meetings with the public, project stakeholders, and resource agencies. The NEPA process has produced a focused purpose and need statement, developed a reasonable range of alternatives, considered the merits of those alternatives, considered interests of resource agencies, impacts to environmentally sensitive areas (such as the Upper Mississippi Wildlife Refuge), and the interest of other entities in the project area.

Another question that has been raised regards proceeding into final design while the NEPA process is still ongoing. Limited aspects of final design may be executed during the NEPA process when there is a need to better distinguish the environmental impacts among multiple alternatives under consideration. Mn/DOT elected to initiate final design prior to completion of the NEPA process. The resources expended on final design prior to completion of the NEPA process are done at Mn/DOT's risk. Mn/DOT did consult with the Minnesota Division Office. The Minnesota Division Office considered the nature of the project at that time: the coordination Mn/DOT had undertaken with the public and resource agencies, the lack of controversy surrounding the project, the diligence demonstrated in incorporating avoid-minimize-mitigate into decisions, and the amount of time in which we expected to see a NEPA document for processing and public comment. We did not foresee a gap of more than a few months between the time final design was initiated and having a formal public comment period.

The resources expended on final design prior to completion of the NEPA process may not be used as a reason to accept/reject an alternative or discard new information pertinent to the NEPA decision-making process.

Mn/DOT has documented the considerations and decisions of the project development process in the EA that will be released to the public for review and comment. Substantive comments will be considered prior to finalizing the NEPA process.

In summary, Mn/DOT is following the NEPA process for the Dresbach Bridge crossing.

Is Mn/DOT meeting the requirements of the NEPA process for public participation?

Yes. Mn/DOT held public meetings on March 3, 2008, and November 6, 2008. The Federal requirements for public involvement are outlined in 23 CFR 771.111(h). FHWA promotes early and continuous public involvement as well as a public hearing (or the opportunity for a public

hearing). Approximately one year of project development time (post-2008) was expended to resolve I-90/TH 61 interchange design issues on the Minnesota side.

The EA is currently being circulated for signature among the state agencies before being submitted to the Minnesota Division of FHWA for processing. If the FHWA finds the EA to be adequate, it will be signed and made available for public review and comment (30 days minimum). A public hearing may be held no sooner than 15 days after the EA is made available to the public. The early public meetings, the EA public comment period, and the public hearing during the EA comment period are adequate to fulfill the Federal requirements for public involvement.

What is FHWA's position regarding the proposed project's consideration of bicyclists and pedestrians?

The FHWA is satisfied with Mn/DOT's consideration of bicycle/pedestrian accommodations for the Dresbach Bridge project to date. Any reconsideration of the project scope to include bicycle/pedestrian accommodations along the I-90 corridor would happen as part of digesting public and agency comments in response to the EA.

A March 24, 2008, letter from the La Crosse Area Planning Committee (LAPC) to Mn/DOT outlined the discussion from a March 5, 2008, Dresbach Bridge Rehabilitation Technical Advisory Committee regarding bicycle accommodations. The letter outlined WisDOT concerns about including bicycle and pedestrian accommodations along I-90 as well as a 2004 La Crescent Bicycle and Pedestrian Plan recommendation (supported by the LAPC) to focus on the Wagon Wheel Trail as the preferred link between Wisconsin and Minnesota. The following are excerpts from the LAPC letter:

| *“Two local groups, the House County Trails Group and the LAPC Bicycle/Pedestrian Committee, agreed at March meetings that accommodations through the I-90/TH61 intersection to the Root River Trail in Houston County, and to La Crosse in Wisconsin are more important than a bikeway on I-90 and are “the desirable way to go.”*

| *“Noting the recommendations in current plans, the agreement of local advocacy groups, and the concerns of WisDOT, the LAPC Policy Board voted, on March 19, 2008, to support the recommendation that Mn/DOT concentrate on safety bicycle and pedestrian accommodations through the I-90/TH 61 intersection to La Crescent before considering a bikeway on the Dresbach Bridge.”*

LAPC passed a resolution in May 2010 indicating support of a bicycle/accommodation along the I-90 corridor between Minnesota and Wisconsin.

The current 2035 Coulee Regional Bicycle Plan maps (e.g. Maps 4-1, 4-4) do not indicate actual construction of a bicycle/pedestrian facility between Minnesota and Wisconsin. There are also no programmed projects to construct a bicycle/pedestrian facility between Minnesota and Wisconsin in or along the I-90 corridor.

The LAPC and local bicycle/pedestrian groups were supportive of not having a bicycle/pedestrian accommodation along the I-90 corridor between Wisconsin and Minnesota when the Dresbach Bridge NEPA process started. The May 2010 LAPC resolution supporting inclusion of bicycle/pedestrian accommodation along the I-90 corridor occurred after the project progressed to the point of having a preferred alternative in the draft EA. The remaining points of discussion (prior to release of the EA to the public) pertained to interchange geometric issues on the Minnesota side of the project. The public and interested stakeholders will have an opportunity to provide comments in response to an EA anticipated to be released this summer.

The United States Department of Transportation complete streets policy requires that walking and bicycling be *considered* as part of a project. The complete streets policy does not require the NEPA process to formally have an alternative(s) that accommodates walking and bicycling or that every project incorporate a walking/bicycling component. A need to include walking and bicycling accommodations must be established on a project-by-project basis.

The physical inclusion of a portion of a bicycle/pedestrian trail along the I-90 corridor would require:

- (1) The NEPA process to document a need for bicycle/pedestrian accommodation, determine alternatives of how bicyclists/pedestrians would move between Minnesota to Wisconsin, evaluate the environmental impacts associated with the alternatives, and determine if the need justifies the environmental impacts.
- (2) The Dresbach bridge project to construct a portion of a bicycle/pedestrian facility with independent utility and logical termini.

Even if walking and bicycling accommodations are established as a project need, the negative environmental impacts may not justify fulfilling the established need.