State of Wisconsin DEPARTMENT OF NATURAL RESOURCES 101 S. Webster Street Box 7921 Madison WI 53707-7921

Scott Walker, Governor Daniel L. Meyer, Secretary Telephone 608-266-2621 Toll Free 1-888-936-7463

TTY Access via relay - 711



November 28, 2017

DNR Project No. DC-0187

Mr. Steve Steinhoff, Deputy Director Capital Area Regional Planning Commission City County Building, Room 362 210 Martin Luther King Jr. Blvd. Madison, WI 53703

Subject: Amendment Request - Village of Waunakee, Resolution DC-2017-19

Dear Mr. Steinhoff:

We have completed our review of the subject sewer service area amendment request submitted to the Capital Area Regional Planning Commission (CARPC) on September 7, 2017 with a subsequent public hearing held on October 12, 2017. This amendment involves modification of environmental corridors in the Village of Waunakee to accommodate a brownfields redevelopment for a new Waunakee Library. The Department hereby approves this amendment noting the recommendations by CARPC staff and the steps required for state level permits and additional approvals. CARPC technical experts have carefully provided detailed recommendations articulated in the <u>linked staff analysis</u>.

The Village of Waunakee has worked eight years to remediate and redevelop the 6.34-acre former industrial site which will now serve as the location of the new library, and which is contiguous with McWatty Park, a 2.1-acre neighborhood park adjoining Six Mile Creek, at the east end of the Village's historic downtown business district one block north of Main Street. This unique amendment changes the corridor to accommodate a new public library building at the former Waunakee Alloy Casting Corporation site located at 201 N. Madison Street in the Village of Waunakee.

This redevelopment site is located just 125 feet north of Six Mile Creek, which is designated an Exceptional Resource Water. In 2016, total phosphorus was found at levels exceeding water quality standards which formed the basis of its listing on the DNR's 303(d) Impaired Waters list. Riparian corridors for Six Mile Creek are important for aquatic health and integrity and the DNR recommends following through with the considerations and recommendations stated in the CARPC Resolution. The amendment modification is visually depicted in the attached map.

This amendment is a formal update to the state's Areawide Water Quality Management Plan and the Dane County WQM Plan and will be forwarded to the US Environmental Protection Agency to meet the requirements of the Clean Water Act of 1987 (Public Law 92-500 as amended by Public Law 95-217) and outlined in the federal regulations 40 CFR, Part 35. This review is an integrated analysis action under s. NR 150.20 (2) (a) 3., Wis. Adm. Code. By means of this review, the Department has complied with ch. NR 150, Wis. Adm. Code, and with s. 1.11, Wis. Stats. The approval of this sewer service area amendment does not constitute approval of any other local, state, or federal permit that may be required for sewer construction or associated land development activities.

Appeal Rights:



Wisconsin statutes and administrative rules establish time periods within which requests to review Department decisions must be filed. For judicial review of a decision pursuant to sections 227.52 and 227.53, Wis. Stats., a party has 30 days after the decision is mailed, or otherwise served by the Department, to file a petition with the appropriate circuit court and serve the petition on the Department. Such a petition for judicial review must name the Department of Natural Resources as the respondent.

To request a contested case hearing pursuant to section 227.42, Wis. Stats., a party has 30 days after the decision is mailed, or otherwise served by the Department, to serve a petition for hearing on the Secretary of the Department of Natural Resources. All requests for contested case hearings must be made in accordance with section NR 2.05(5), Wis. Adm. Code, and served on the Secretary in accordance with section NR 2.03, Wis. Adm. Code. The filing of a request for a contested case hearing does not extend the 30 day period for filing a petition for judicial review.

Sincerely,

Timothy R. Asplund

Monitoring Section Chief

**Bureau of Water Quality** 

cc:

Village of Waunakee

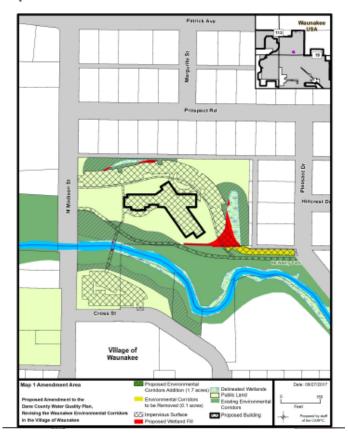
Mike Sorge – DNR – SD

Greg Searle – DNR WQ/3

Andrew Simek - DNR - LS/8

Lisa Helmuth – DNR – WQ/3

Map 1 – Amendment Area





210 Martin Luther King Jr. Blvd. Room 362 Madison, WI 53703 Phone: 608-266-4137 Fax: 608-266-9117 www.CapitalAreaRPC.org info@CapitalAreaRPC.org

#### Resolution CARPC No. 2017-19

Recommending to the Wisconsin Department of Natural Resources Amendment of the Dane County Water Quality Management Plan by Revising the Environmental Corridors in the Waunakee Urban Service Area in the Village of Waunakee

WHEREAS, the Capital Area Regional Planning Commission (CARPC) is a duly created regional planning commission under Wis. Stat. § 66.0309; and

WHEREAS, the CARPC has an agreement with the Wisconsin Department of Natural Resources (WDNR) to provide water quality management planning assistance to the WDNR; and

WHEREAS, the CARPC has adopted, reaffirmed, and recommended amendment of the *Water Quality Management Plan for Dane County*; and

WHEREAS, said plan delineates urban and limited service areas and environmental corridors as amended through July 2017; and

WHEREAS, the Village of Waunakee has requested an amendment to the Environmental Corridor boundaries in the Waunakee Urban Service Area; and

WHEREAS, a staff analysis of the proposed amendment has been prepared, which indicates that the amendment is consistent with the water quality standards under Wis. Stat. § 281.15.

NOW, THEREFORE, BE IT RESOLVED that in accordance with Sec. 208 of Public Law 92–500, the Capital Area Regional Planning Commission recommends the amendment of the *Dane County Water Quality Management Plan* by revising the Environmental Corridors boundaries in the Waunakee Urban Service Area as shown on the attached map.

The recommendation for approval of this amendment is based on the Village's submitted proposal and conditioned on the Village of Waunakee's commitment to pursuing the following:

- Obtain a wetland general permit from the Wisconsin Department of Natural Resources and, if necessary, the U.S. Army Corps of Engineers for the proposed 7,320 square feet of wetland fill.
- Submit a detailed stormwater management plan for CARPC staff review and approval (in conjunction with DCL&WCD staff) for the amendment area. The stormwater management plans shall meet the requirements of the Village of Waunakee (Chapter 109) and Dane County (Chapter 14) stormwater ordinances.
- 3. Develop and implement a riparian buffer restoration and vegetation management plan for the site, with the Village responsible for maintenance in perpetuity.
- 4. The restored riparian buffer, wetlands, and stormwater management facilities shall be designated as environmental corridors.

5. Stormwater runoff from all impervious surfaces shall be directed to one of the proposed stormwater management facilities prior to discharging to the wetlands or Six Mile Creek, to the extent feasible.

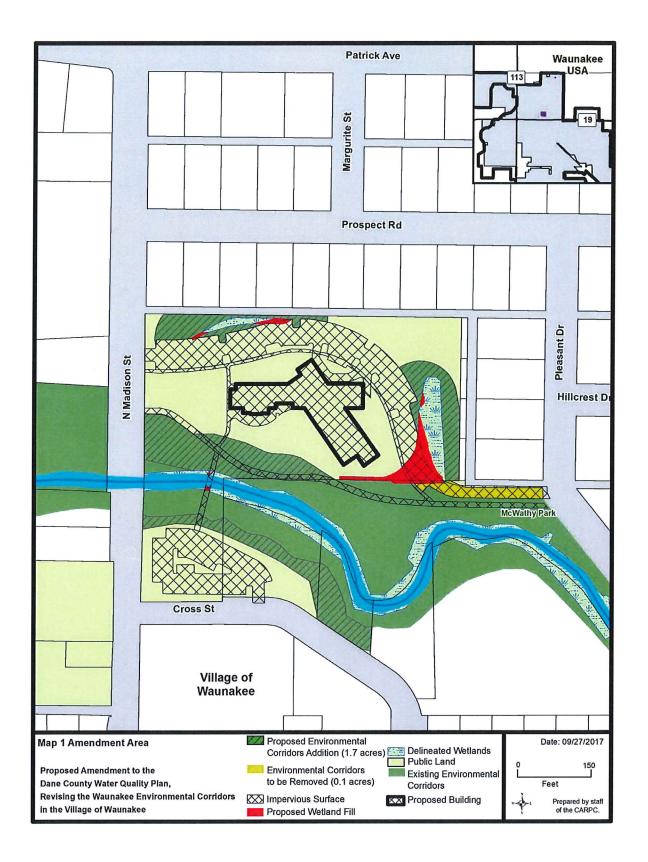
It is also recommended that the Village of Waunakee pursue the following measures:

- 1. Consider expanding the riparian buffer restoration plan for the site to include the south side of Six Mile Creek.
- 2. Consider using permeable pavement for the shared use path, access drive, and/or parking spaces, where appropriate based on groundwater depths.
- 3. Encourage the responsible use of deicers at the site as part of the WI Salt Wise Partnership.

October 12, 2017	
Date Adopted	

Larry Palm, Chairperson

Kris Hampton, Secretary





210 Martin Luther King Jr. Blvd. Room 362 Madison, WI 53703 Phone: 608-266-4137 Fax: 608-266-9117 www.CapitalAreaRPC.org info@CapitalAreaRPC.org

September 12, 2017

## NOTICE OF PUBLIC HEARING October 12, 2017

Consideration of Recommendation
to the Wisconsin Department of Natural Resources on
Amendment of the Dane County Water Quality Plan
by Revising the Environmental Corridors
in the Waunakee Urban Service Area
in the Village of Waunakee

PLEASE TAKE NOTICE that the Capital Area Regional Planning Commission will hold a public hearing convening at 7:00 p.m. on October 12, 2017, in Room 351, City County Building, 210 Martin Luther King Jr. Blvd., Madison, WI, for the purpose of consideration of an amendment to the *Dane County Water Quality Plan* revising the environmental corridor boundaries in the Waunakee Urban Service Area, as requested by the Village of Waunakee. The proposed environmental corridor amendment is located at a new public library site, redevelopment of the former Waunakee Alloy Casting Corporation site, located at 201 N. Madison Street in the Village of Waunakee. The proposed access drive would reduce the vegetated buffer for Six Mile Creek below the 75 foot minimum width adopted in the environmental corridor policies and criteria of the *Dane County Water Quality Plan*. The Village is also seeking DNR approval to fill 7,320 square feet of newly identified wetlands on the property as well as provide a reduced buffer for those wetlands. The application request and staff analysis report will be posted on the CARPC website at <a href="https://www.CapitalAreaRPC.org">www.CapitalAreaRPC.org</a>.

For information or questions, contact Mike Rupiper at MikeR@CapitalAreaRPC.org or 608-266-9283.

E-mailed to: Chris Zellner, Village President, Village of Waunakee

Todd J. Schmidt, Administrator/Economic Development Director, Village of Waunakee

Tim Kiefer, District 25, Dane County Board of Supervisors

City, Village and Town Clerks Joe Parisi, Dane County Executive Paul Soglin, Mayor, City of Madison

Jerry Derr, President, Dane County Towns Association

Jon Hochkammer, President, Dane County Cities and Villages Association

Scott McDonell, Dane County Clerk

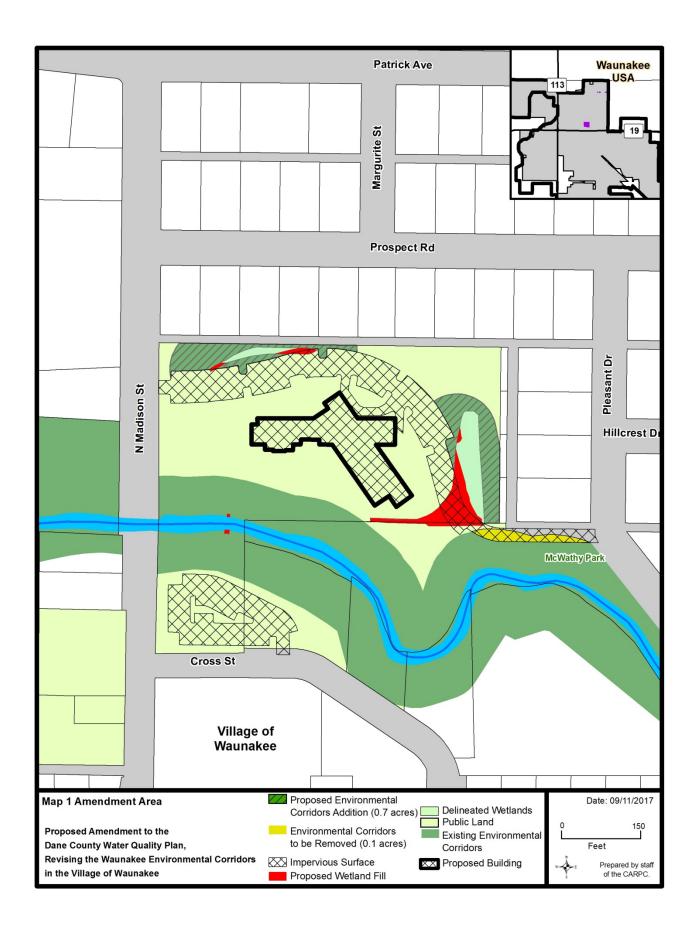
Sharon Corrigan, Chair, Dane County Board of Supervisors

Mary Kolar, Chair, Dane County Zoning and Land Regulation Committee

Patrick Downing, Chair, Dane County Environment and Nat'l Resources Committee

Jenni Dye, Chair, Dane County Personnel and Finance Committee

Rebecca Power, Chair, Dane County Lakes and Watershed Commission Lyle Updike, Vice Chair, Dane County Lakes and Watershed Commission Susan Jones, Coordinator, Dane County Lakes and Watershed Commission Al Matano, Chair, Madison Area Transportation Planning Board Bill Schaefer, Manager, Madison Area Transportation Planning Board Todd Violante, Dane County Department of Planning and Development Michael Mucha, Director and Chief Engineer, MMSD Laura Hicklin, Interim Director, Dane County Land and Water Resources Dept. Charles Hicklin, Dane County Controller Robert Phillips, City Engineer, City of Madison Tom Heikkinen, General Manager, Madison Water Utility James Kuehn, WisDOT Diane Paoni, WisDOT Bruce Rheineck, WDNR Greg Searle, WDNR Fitchburg Service Center Sharon L. Gayan, WDNR Lisa Helmuth, WDNR Central Office Tim Asplund, WDNR Central Office Curt Sauser, Sewer Connections and Extensions, MMSD



# Staff Analysis of a Proposed Amendment to the Dane County Water Quality Plan, Revising the Environmental Corridors of the Waunakee Urban Service Area in the Village of Waunakee

### 1. Background and Existing Conditions

The proposed project is a new public library building at the former Waunakee Alloy Casting Corporation site located at 201 N. Madison Street in the Village of Waunakee (see Maps 1 and 2). The project site is approximately 9 acres in size and is bounded by Six Mile Creek to the south, a residential alley and residential homes to the north, Madison Street to the west and Pleasant Drive and residential homes to the east. The Amendment Area is included within the original Urban Service Area delineated for Waunakee in 1977, by Res. DCRPC No. 174. Environmental corridors were first delineated and adopted for the Waunakee Urban Service Area in 1984. At that time, the environmental corridors in this area were delineated based on Six Mile Creek, the associated floodplain, and the park (see Map 3). Buffer widths were limited in some instances due to existing development. No wetlands were identified in the original environmental corridor delineation.

After more than 60 years in operation as a metal foundry and casting company the company closed in 2009. It left a legacy of soil contamination and vacant buildings. With financial assistance from the USEPA to remove mercury and PCB contaminants, it is being redeveloped to become the new Waunakee Public Library. Six Mile Creek, located approximately 125 feet south of the proposed facility, is designated an Exceptional Resource Water in this area by DNR. In 2016 it was also added to DNR's 303(d) Impaired Waters list for total phosphorus; although, the available biologic data did not indicate impairment.

On April 19th and June 9th of 2017, Scott Taylor of Taylor Conservation, LLC performed wetland delineations within a 10-acre area of land encompassing the site and a stretch of Six Mile Creek (see Map 4). Four wetlands were identified: the low-lying margins of the stream banks (Wetland 1); an existing stormwater basin on the south side of the creek (Wetland 2); and two depressions in the industrial site (Wetlands 3 and 4). A total of approximately 1.75 acres of wetlands were delineated (1.3 acres of riparian wetlands; 0.2 acre stormwater basin, and 0.25 acres in the industrial site depressions). Only the stream bank wetlands (Wetland 1) are included in the existing mapped Environmental Corridors. The Army Corps of Engineers and the Wisconsin Department of Natural Resources hold legal jurisdiction over wetlands and regulate

development activities associated with these resources. The stormwater basin (Wetland 2), which was constructed, is considered to be an artificial wetland and is not similarly regulated.

The Wisconsin Wetlands Inventory (WWI) identifies tree-dominated wetlands (T3K) along Six Mile Creek. The industrial site wetlands were not identified in the WWI data. Differences between the WWI and field-identified wetland boundaries reflect the greater accuracy of field methods over the interpretation of wetland boundaries from aerial photographs, which is the method used in the WWI, as well as the tendency for wetland vegetation to establish itself over time in drainage ditches and low lying areas. The mapped wetland boundaries closely match the field-identified wetland boundaries along the river.

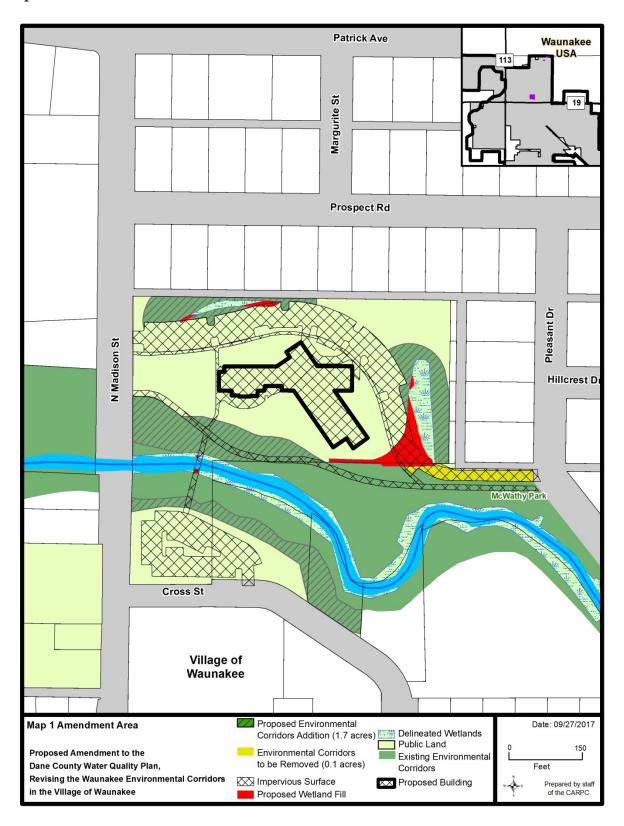
The riverside wetlands (Wetland 1) are the bottoms of steep stream banks and flat benches just above the ordinary high water mark of the river. The industrial site wetlands (Wetland 3 and Wetland 4) occupy small depressions. The stormwater basin wetland (Wetland 2) is a deep, steep-sided basin with inlet and outlet pipes. The wetlands are dominated by broad-leaved cattails, and reed canary grass in the ground layer; by red osier dogwood, silver maple, green ash and box elder in the sapling/shrub layer; and by silver maple, box elder and black willow in the tree layer. The stormwater basin contains open water and cattails.

The industrial site wetlands and stormwater basin wetlands chief water source is surface runoff from surrounding developed areas. The streamside wetlands' chief water source is overspill from Six Mile Creek. All of the wetlands probably saturate in the spring and throughout the year following rainy periods. Wetlands 1, 3, and 4 exhibit medium wetland quality and susceptibility to stormwater runoff, whereas Wetland 2 exhibits poor wetland quality and low susceptibility to stormwater runoff.

The un-mowed industrial site uplands are dominated by garlic mustard, Kentucky bluegrass, tall fescue, and Canada goldenrod in the ground layer; and by box elder and cottonwood in the sapling and tree layers. The mowed turf uplands are dominated by Kentucky blue grass and tall fescue. The upper stream bank uplands are dominated by garlic mustard and white avens in the ground layer; by box elder and honeysuckle in the sapling/shrub layer; and by box elder and in the tree layer.

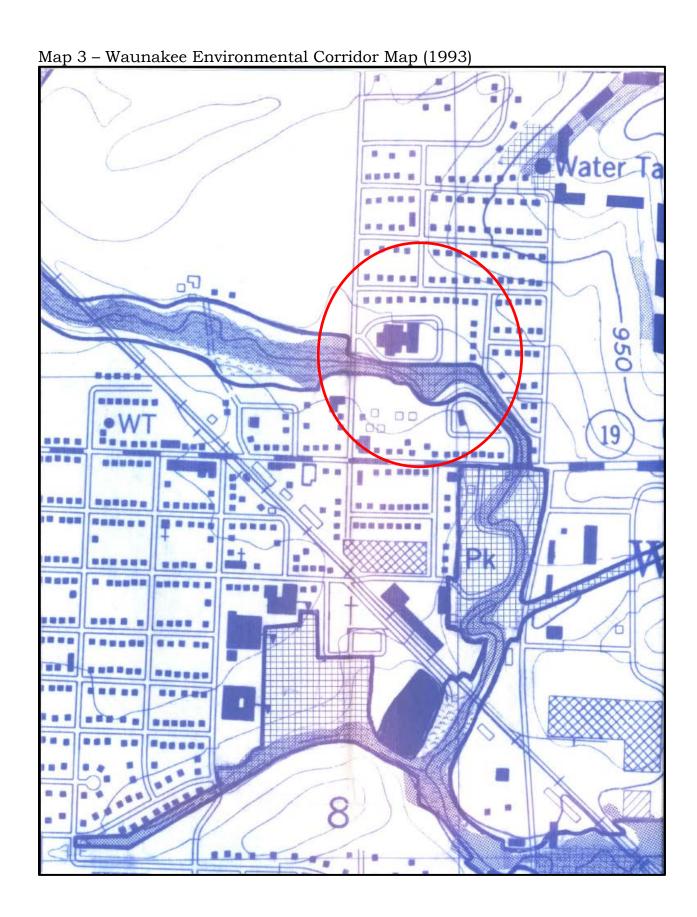
Soils borings taken at the site indicate a depth to water table ranging from 2.5 to 8 feet. Seasonal fluctuations in the water table of up to several feet should be expected.

Map 1 – Amendment Area

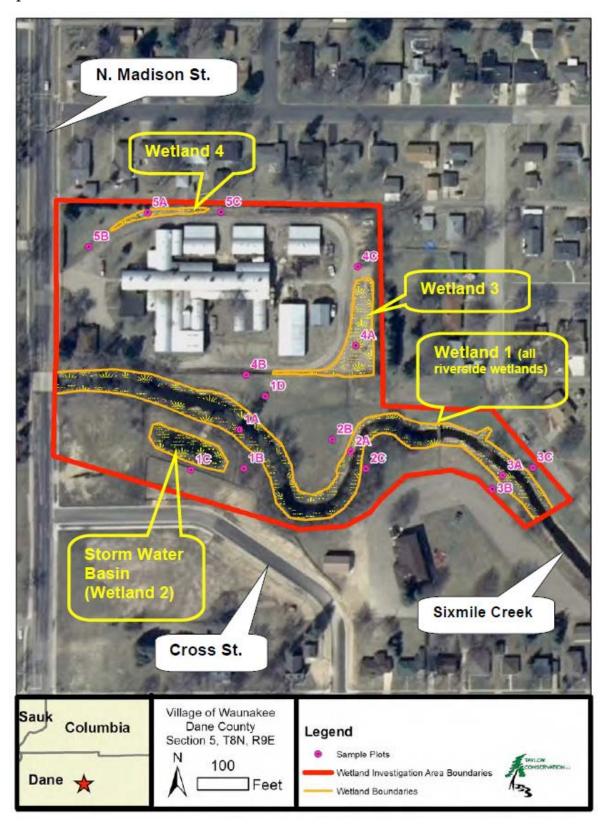


Map 2 – Aerial





Map 4 – Delineated Wetlands



#### 2. Description of the Proposal

The Village of Waunakee has been working for the past eight years to remediate and redevelop the 6.34-acre former industrial site. The site for the new library is located contiguous with McWatty Park, a 2.1-acre neighborhood park adjoining Six Mile Creek, at the east end of the Village's historic downtown business district one block north of Main Street. The Village proposes to integrate and improve both sites to achieve the following benefits:

- Redevelopment of a previously contaminated brownfield site
- A natural and civic amenity to enhance the Village's Central Business District, which includes new residential units in its downtown area
- Walking, biking and vehicle access to the library from both N.
   Madison St. and Pleasant Dr., to optimize access and user safety from both directions
- Completing a segment of a planned off-street trail along Six Mile Creek through the Village, connecting more neighborhoods with a safe walking/biking route
- Restoring shoreland buffer strips near the Creek by replacing mowed turf grass with native prairie and wetland species (see Map 5)
- Removing an underutilized basketball court and replacing an aging playground
- Decreasing the imperviousness of the site from 46 to 36 percent

In order to complete the necessary improvements, the Village is requesting a variance to the adopted policies and criteria for Environmental Corridors in order to perform the following actions:

- Grading within 30' of wetlands in some areas
- Reducing wetland buffers below a 75' width in some areas

According to the Village, access to Pleasant Dr. on the east side of the proposed development requires a driveway through McWatty Park on land currently occupied by a basketball court and playground, both of which are within the currently mapped Environmental Corridor. The Village requests an amendment to the Water Quality Management Plan to allow grading and reduced wetland buffers in the Environmental Corridor as shown in Map 6.

The grading will direct all runoff from the impervious surfaces to be conveyed to stormwater facilities prior to release to Six Mile Creek. This includes the multi-use path that is within the environmental corridor.

The Village has proposed a restoration plan (see Map 5) for the vegetation in the environmental corridor including prairie buffer between the creek bank and the multi-use trail. The width of the buffer will be a minimum of 20 feet wide and up to 80 feet wide along some of the creek. The landscape objectives for the buffer zone include the removal of existing poor quality or invasive trees and the addition of appropriate new plants as follows:

- Trees to create an upper canopy to provide habitat for birds and other wildlife and shade for wetlands
- Shrubs to create a mid-story of vegetation to provide food and cover for wildlife and help prevent erosion
- Herbaceous plants to create an understory and include ferns, wildflowers, and various groundcover plants

The previous industrial site was built prior to the requirements for stormwater management. Redevelopment of the property will require that stormwater management facilities be incorporated into the site. The proposed site is currently split by Six Mile Creek. The north side of the creek will be required to meet redevelopment stormwater standards while the south side will be required to meet new development standards.

A partial green roof along with two wet ponds will meet the required 40% total suspended solids (TSS) removal needed for the redevelopment site. According to the conceptual stormwater modeling the ponds will provide 63 to 80% TSS removal. Oil and grease control is required and may be provided by and oilwater separator. Although not required by the redevelopment standards, some currently undetermined amount of peak rate control and volume control will also occur within these facilities. This will be an improvement over existing conditions, where stormwater runoff enters into the wetlands or creek without treatment. On the south side of the creek, the proposed parking lot will be designed with stormwater facilities that will fulfill the requirements for new development including peak rate control, 90% volume control, and water quality (80% total suspended solids removal and oil & grease control).

Map 5 –Conceptual Restoration Plan



WAUNAKEE PUBLIC LIBRARY 2017 June 26

Map 6 –Conceptual Stormwater and Erosion Control Plan ASSOCIATES, WAUNAKEE LIBRARY త SNYDER 116.0144.30

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#### 3. Consistency and Conflict with Adopted Plans and Policies

On July 17, 2017 the Waunakee Village Administer, acting on behalf of the Village, formally requested a "major change" amendment to the environmental corridors for the site. On September 7th, the Village applied for a general permit from DNR to fill 7,320 sq. ft. (0.17 ac.) of wetland area associated with the industrial site wetlands (Wetland 3 and Wetland 4) to accommodate the access drive. According to a preliminary review by DNR staff, the project will likely receive general permit coverage.

#### **Environmental Corridors**

The Dane County Water Quality Plan outlines policies regarding the delineation and designation of environmental corridors. The Environmental Corridors report, adopted by the Dane County Regional Planning Commission in 1996, and approved by the WDNR in 1997 established the need for a minimum 75-foot vegetative shoreland and wetland buffer. The need for buffer strips is based on the role they play in filtering pollutants from stormwater runoff; protecting stream banks and wetlands from erosion; providing space for the natural meander, shifting, and expansion of streams and wetlands; and protecting the habitat functions of these resource areas. Because of the natural resource functions provided by vegetative buffer strips, any encroachment into the minimum buffer width of 75 feet requires an evaluation of the impacts of the encroachment. This evaluation is performed through the Water Quality Plan amendment process and the requirement for WDNR review and approval.

The Capital Area Regional Planning Commission subsequently adopted Environmental Corridor Policies in February 2008. These policies include:

- Vegetative buffers for wetlands and shorelands (75-feet minimum and excluding impervious surfaces).
- Grading in a wetland vegetative buffer and within 30 feet of the wetland edge, where the buffer has been delineated in environmental corridors, unless the grading is intended to re-establish natural grades or to restore wetland habitat.
- Grading or the installation of stormwater management measures and practices in an environmental corridor should not appreciably reduce or harm the ecological functions of the environmental corridor.

#### Stormwater Management

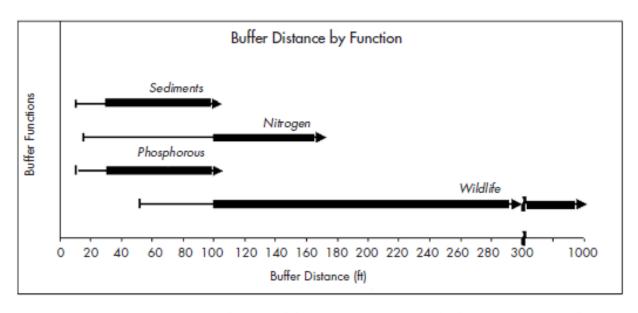
The concept stormwater management plan meets or exceeds the stormwater management requirements in Village of Waunakee (Chapter 109) and Dane County (Chapter 14) ordinances.

#### 4. Impacts or Effects of the Proposal

The proposed development includes a restoration plan for the buffer between the creek bank and the multi-use trail. The proposed mix of trees, shrubs, and herbaceous plants will provide better habitat and water quality compared to the current poor quality or invasive trees and low mowed turf grass.

The stormwater management plan will be required to meet or exceed total suspended solid reduction, peak runoff rates, oil and grease control, and infiltration/stay-on requirements in the Village of Waunakee and Dane County ordinances. This will provide better water quality compared to the current industrial site that was constructed prior to any stormwater management requirements.

The purpose of a vegetated buffer is to provide water quality and wildlife protection functions. The proposed minimum vegetated buffer width of 20 feet is insufficient to provide effective sediment and phosphorus removal. But the proposed stormwater management facilities will provide this stormwater management function. Therefore the proposed buffer width reduction should not have a negative effect on water quality. The proposed buffer width will provide little to no wildlife protection benefits, as is the case with the standard 75 foot buffer. The proposed buffer vegetation, however, will provide a significantly better habitat compared to the current condition of poor quality or invasive trees and low mowed turf grass.



Effective buffer distance for water quality and wildlife protection functions. The thin arrow represents the range of potentially effective buffer distances for each function as suggested in the science literature. The thick bar represents the buffer distances that may most effectively accomplish each function (30 - > 100 feet for sediment and phosphorous removal; 100 - > 160 feet for nitrogen removal; and 100 - > 300 feet for wildife protection. Depending on the species and the habitat characteristics, effective buffer distances for wildlife protection may be either small or large.

Source: Planner's Guide to Wetland Buffers for Local Governments, Environmental Law Institute 2008.

The purpose of the 30 foot no grading setback is to protect the wetland from sedimentation during construction. Effectively implemented erosion control practices can provide the same or a higher level of protection.

#### 5. Alternatives

The Village was required to conduct and submit an alternatives analysis as part of their wetland fill permit application. Their alternatives analysis looked at the feasibility of alternative locations for the library as well as alternative site designs. They determined that the other alternatives were undesirable due to significant additional project costs (at least \$400,000) and other considerations.

#### 6. Controversies, Comments Received, Unresolved Issues

A public hearing has been scheduled for October 12, 2017 to receive testimony on this proposed amendment to the *Dane County Water Quality Plan*. Staff has not received any comments on the proposed amendment as of this writing.

The Village's application for a wetland general permit from the DNR and the U.S. Army Corps of Engineers is still pending as of this writing.

#### 7. Summary and Conclusions

The "major change" to the environmental corridors is located in part of the original urban service area delineation for the Village of Waunakee in 1977. Environmental corridors were first delineated and adopted for the Waunakee Urban Service Area in 1984. At that time, no wetlands were identified.

The following conclusions can be made in support of the proposed amendment:

- The proposed riparian buffer restoration will improve water quality and provide better habitat compared to the current condition.
- The proposed stormwater management plan for the site meets or exceeds the requirements in the Village of Waunakee and Dane County Ordinance.
- The proposed stormwater management plan will improve water quality compared to the industrial site which was constructed prior to any stormwater management requirements.
- The reduced buffer widths and reduced no grading zone will be mitigated by the proposed stormwater management and erosion control plan.

In summary, it is the opinion of CARPC staff that overall the proposed changes on the site will have positive impacts to water quality.

CARPC staff suggests that the Commission recommend this amendment to the *Dane County Water Quality Plan* to WDNR for approval, based on the Village's submitted proposal and conditioned on the Village of Waunakee's commitment to pursuing the following:

- 1. Obtain a wetland general permit from the Wisconsin Department of Natural Resources and, if necessary, the U.S. Army Corps of Engineers for the proposed 7,320 square feet of wetland fill.
- 2. Submit a detailed stormwater management plan for CARPC staff review and approval (in conjunction with DCL&WCD staff) for the amendment area. The stormwater management plans shall meet the requirements of the Village of Waunakee (Chapter 109) and Dane County (Chapter 14) stormwater ordinances.

- 3. Develop and implement a riparian buffer restoration and vegetation management plan for the site.
- 4. The restored riparian buffer, wetlands, and stormwater management facilities shall be designated as environmental corridors.
- 5. Stormwater runoff from all impervious surfaces shall be directed to one of the proposed stormwater management facilities prior to discharging to the wetlands or Six Mile Creek, to the extent feasible.

It is also recommended that the Village of Waunakee pursue the following measures:

- 1. Consider expanding the riparian buffer restoration plan for the site to include the south side of Six Mile Creek.
- 2. Consider using permeable pavement for the shared use path, access drive, and/or parking spaces, where appropriate based on groundwater depths.
- 3. Encourage the responsible use of deicers at the site as part of the <u>WI Salt Wise Partnership</u>.