

City of Madison, Wisconsin

AN AMENDED
SUBSTITUTE
RESOLUTION _____

Providing the Wisconsin Department of Transportation with the City of Madison's comments on the Draft Environmental Impact Statement (DEIS) for the Verona Road/West Beltline Highway Project.

PRESENTED 5-18-04
REFERRED Long-Range Transportation Planning Commission, Pedestrian, Bicycle, Motor Vehicle Commission, Transit and Parking Commission, Plan Commission, Board of Public Works
REREFERRED Above (7-6)

REPORTED BACK JUL 06 2004; SEP 07 2004

Drafted By: Bradley J. Murphy, Planning Unit Director

ADOPTED X POF _____

Date: August 30, 2004

RULES SUSPENDED _____

PUBLIC HEARING _____

Fiscal Note: Although the project will have significant fiscal implications, no expenditure is required to convey the City comments on the Environmental Impact Statement via this Resolution.

APPROVAL OF FISCAL NOTE IS NEEDED
BY THE COMPTROLLER'S OFFICE
Approved By

Comptroller's Office

Sponsors: Mayor David J. Cieslewicz
Ald. Ken Golden

AMENDED SUBSTITUTE 61822
RESOLUTION NUMBER _____
ID NUMBER 36137

WHEREAS the Wisconsin Department of Transportation (WDOT) has prepared a Draft Environmental Impact Statement (DEIS) to address the long-term needs of the Madison area's West Beltline Highway and Verona Road as the first step in planning for long-term infrastructure investments within this area; and

WHEREAS the DEIS includes three major focus areas, including:

- The segment of the U.S. Highway 151 corridor centering on the Verona Road interchange and Verona Road south to County Trunk Highway PD;
- The U.S. Highway 12/14 (West Beltline Highway) corridor from the U.S. Highway 14 (University Avenue) interchange to the Todd Drive interchange; and
- The U.S. Highway 12/14 crossings (interchanges and grade-separated crossings) between U.S. Highway 14 and Todd Drive; and

WHEREAS the Wisconsin Department of Transportation has conducted a planning process which included a large technical committee comprised of representatives from the affected municipalities; formed an advisory committee comprised of elected officials and representatives from the affected neighborhoods; partially funded the preparation of a draft physical improvement plan for the Allied-Dunn's Marsh-Belmar Neighborhood; and

worked closely with City agencies and policy makers throughout the “needs assessment” process and DEIS process dating back to the beginning of the process in 1997.

WHEREAS the DEIS acknowledges that the Verona Road/West Beltline project will have several impacts on surrounding neighborhoods, and the DEIS outlines mitigation measures proposed to avoid, minimize or mitigate the negative impacts. The City appreciates the open and inclusive process used to prepare the DEIS, the financial participation of WisDOT in the preparation of the Draft Allied Dunn’s Marsh Physical Improvements Plan, and the extensive outreach efforts made to engage the community during the development and evaluation of the alternatives. Furthermore, the City of Madison acknowledges the efforts that WisDOT has made toward minimizing and mitigating the negative impacts.

NOW THEREFORE BE IT RESOLVED that the Madison Common Council hereby endorses the submittal of the attached comments on the DEIS entitled “Summary Comments on the Draft Verona Road/West Beltline Highway Environmental Impact Statement” dated May 25, 2004 and further specifically requests the Wisconsin Department of Transportation to integrate ~~include~~ these comments in the Final Environmental Impact Statement (FEIS), commit to the implementation of ~~along with~~ the following specific recommendations, and where noted, enter into a formal agreement with the City to ensure adequate implementation.

- **U.S. Highway 151/Verona Road from U.S. Highway 12/14 (the West Beltline Highway) to County Trunk Highway PD.**

The requirements of Executive Order 12898 (Environmental Justice) have not been adequately addressed by the current DEIS. **However, the requirements of Executive Order 12898 (Environmental Justice) can be adequately addressed if the final EIS, final project design, and final implementation plan (including improvements to the Allied/Dunn’s Marsh neighborhood), includes all of the recommendations contained in this resolution.**

The requirements of Executive Order 12898 state that federally funded projects shall identify and address, as appropriate, disproportionately high and adverse human health or environmental effects on minority populations or low-income populations, including the inter-related social and economic effects. The DEIS indicates that the project “results in several impacts having disproportionately high and adverse effects on minority or low-income populations in the Allied-Dunn’s Marsh Neighborhood.” “Disproportionately high and adverse effects include residential relocations, business relocations, neighborhood access changes, and parkland changes.” The DEIS also states that “these changes will affect minority and low income populations more than the non minority and non low-income population because a large minority and low-income population resides in the neighborhood areas surrounding the corridor.” The depressed freeway portion of the project - which at this time includes the construction of a 30-foot deep depressed freeway with walls, fencing and 55 mile-per-hour traffic - **will could** significantly increase the psychological and physical isolation of neighborhoods separated by the freeway. The DEIS acknowledges the physical isolation of the Allied Dunn’s Marsh neighborhood.

The City of Madison does not support the free flow alternative concept as currently proposed. In particular, the City believes that the free flow alternative, as currently proposed, will have disproportionately high and adverse human health and environmental effects on minority and low-income populations - including the inter-related social and economic effects. The most significant negative impacts associated with the free flow alternative affect neighborhoods in the southeast quadrant of the interchange (Allied Drive, Dunn’s Marsh, Belmar, Marlborough Heights, Crawford Heights and Chalet Gardens), an area which generally contains a much higher level of minority and low-income residents than the City as a whole.

The City staff “Summary of Comments on the DEIS” from May 25, 2004, and the recommendations outlined below, comment extensively on the impacts described within the DEIS and highlight those recommendations that the City believes the Wisconsin Department of Transportation must commit to in the Final Environmental Impact Statement (FEIS) in order to address these concerns. In particular, recommendations 1, 2, 4, 6, 7, 10, 11, 12 ~~and 13 and 17~~ all are intended to mitigate the negative effects of the free flow alternative on neighborhoods in the southeast quadrant of the interchange, an area the DEIS indicates contains much higher levels of minority and low-income residents than the City as a whole.

The City’s specific recommendations, outlined below, will more adequately address the negative effects of the free flow alternative on the psychological and physical isolation of neighborhoods in the southeast quadrant, the reduced transit access to the neighborhood, reduced safety and emergency vehicular accessibility to and from the neighborhood, the loss of housing within the neighborhood and the loss of businesses serving and employing neighborhood residents. While the DEIS outlines some mitigation measures proposed to avoid, minimize or mitigate the negative impacts, the recommendations listed below - and commitments from the Department to implement them – are specifically intended to further mitigate negative effects on residents within the southeast quadrant, and would allow WisDOT to fully address the environmental justice requirements of Executive Order 12898, building upon their efforts to-date.

~~(previous #1) The requirements of Executive Order 12898 (Environmental Justice) have not been adequately addressed; in particular, the disproportionately high and adverse human health and environmental effects directed toward minority and low income populations, including the inter-related social and economic effects of the free flow alternative. The most significant negative impacts associated with the free flow alternative effect neighborhoods in the southeast quadrant of the interchange (Allied Drive, Dunn’s Marsh, Belmar, Marlborough Heights, Crawford Heights and Chalet Gardens), an area which generally contains a much higher level of minority and low income residents than the City as a whole.~~

~~The City of Madison does not support the freeway concept as currently proposed. The City requests the WDOT to cover the depressed freeway between Summit and Williamsburg Way. The DEIS contains no information which evaluates this alternative, its costs and the opportunities to mitigate the negative impacts associated with the construction of a 30 foot deep depressed freeway with walls, fencing and 55 mile an hour traffic which will significantly increase the psychological and physical isolation of neighborhoods separated by the freeway. The FEIS must include an evaluation of this alternative, including the consideration of covering portions of the depressed highway to further reduce noise impacts, to create additional land for development, to provide opportunities for additional landscaped open space and parklands above the tunnel, and to significantly improve the visual and physical connections between neighborhoods east and west of U.S. Highway 151.~~

*Note: Where indicated with ** below, the City of Madison requests that a formal implementation agreement be entered into with WisDOT, to ensure adequate implementation.*

1. ** The City requests WisDOT to cover the depressed freeway between Summit and Williamsburg Way. As part of the FEIS, the City requests that WisDOT fully evaluate the feasibility of covering this part of the depressed freeway, in order to further mitigate the negative impacts associated with the freeway alternative. The DEIS currently contains no information pertaining to the evaluation of this alternative, including the costs and opportunities to mitigate

the negative effects associated with the construction of a 30-foot deep depressed freeway with walls, fencing and 55 mile-per-hour traffic (which will increase the physical and psychological isolation of neighborhoods separated by the freeway).

The City of Madison requests that the FEIS include an evaluation of this alternative (including an evaluation of the covering of portions of the depressed freeway, if the depressed freeway is not completely covered). Covering significant portions of the depressed freeway is intended to further reduce noise impacts in the area, create additional land for development, provide opportunities for additional landscaped open space and parklands above the covered roadway, and to significantly improve the visual and physical connections between neighborhoods east and west of U.S. Highway 151.

~~(previous #2) The City requests the FEIS to include an evaluation of the potential impacts of reducing the design speed of the curves to allow a ramp speed limit of 45 miles per hour.~~

2. The City requests that the FEIS include complete documentation of WisDOT's interchange design evaluation (including the full range of interchange design options considered and dismissed prior to the release of the DEIS), and the impacts of these options on the other quadrants. One of the options evaluated and documented should be reducing the design speed of the curves in the southeast quadrant of the interchange, to allow a ramp speed limit of 45 miles per hour.
3. ****** The FEIS should include the construction of the Raymond Road crossing of U.S. Highway 151 on an alignment consistent with that shown in the Draft Allied-Dunn's Marsh-Belmar Physical Improvement Plan dated May 6, 2004, which aligns the crossing with Thurston Lane.
4. ~~If the depressed freeway between Summit and Williamsburg Way is not completely covered, the width of the Raymond Road, Williamsburg Way and Summit Crossing must be a minimum of 175 feet in order to incorporate improvements which will result in attractive plaza like connections between neighborhoods east and west of the freeway, incorporating wide pedestrian sidewalks, bicycle lanes, adequate areas for pedestrian amenities including pedestrian level lighting and landscaping, in addition to the travel lanes.~~
5. The City requests the FEIS to include an evaluation of the potential to eliminate the frontage road in the southeast quadrant extending from Raymond Road to Summit.
6. If the freeway facility is covered, the Southwest Bicycle Path should be integrated into that design in a manner that maintains the best access for users of the path. In addition, the City request that WisDOT evaluate all pertinent accessibility issues (including access to the Allied Drive and commercial districts in that area), design options, screening possibilities, or other features in order to minimize the feeling of isolation on the Southwest Bicycle Path facility.
7. The City requests WisDOT to investigate the pedestrian/bicycle crossing at its current Williamsburg Way location.
8. ****** The FEIS should include a commitment by the WDOT to fully participate in the costs to redevelop the Madison plaza commercial center to transform this unsuccessful shopping center into a mixed-use commercial and residential area, including the extension of Summit Avenue to Red Arrow Trail. These commitments should be incorporated into a development agreement which will be made part of the FEIS.

9. ** The City recommends that the WDOT commit to the redevelopment of the Madison Plaza commercial center, the early acquisition of some residential and commercial properties and the construction of replacement housing within the center. The FEIS should evaluate alternatives to the standard WDOT relocation process to include early acquisitions of properties and commit funding to provide replacement housing well in advance of the actual construction schedule. This commitment should be in the form of a development agreement between the City of Madison and WDOT which adequately mitigates these impacts and becomes a commitment in the FEIS.
10. ** The City requests the construction of noise barriers within the locations identified in the DEIS with the noise barrier in the southeast quadrant located in conformance with the Draft Allied Drive-Dunn's Marsh-Belmar Physical Improvement Plan dated May 6, 2004. The frontage road south of the noise barrier should also be constructed north of Britta Parkway (a City of Madison park).
11. ** The City supports the mitigation measures for area parks which are included in the DEIS, including the commitment to improve Belmar Park and Marlborough Park and the possible expansion of Doncaster Park.
12. ** The FEIS must commit to a high level of urban streetscape improvements along all reconstructed streets and a high level of landscaping between the freeway, and local arterial streets and between the local arterial streets and frontage roads. All fencing of the freeway must be of high aesthetic quality and adequately screened. Architectural/aesthetic treatments and textures should be applied to all concrete structures associated with bridges, crossings, walls of the depressed freeway, noise barriers and all above ground structures. Entrance features and public art should be incorporated into the project.
13. The FEIS should recognize and acknowledge the negative impact on market values and the appreciation of properties and structures scheduled for acquisition and demolition/relocation. The FEIS should acknowledge the negative economic effects of stagnating market values and appreciation resulting from the likely diminished property maintenance which will occur between the time the FEIS is approved and acquisition occurs.
12. The FEIS should evaluate the changes in response times for safety and emergency service agencies and Madison Metro which would result from the closing of the Seminole Highway ramps.
13. ** The FEIS should commit to mitigate the negative impacts associated with disruptions to the transit routing and potential loss of service in parts of the neighborhood east of Verona Road.
14. The DEIS does not adequately address the secondary impacts from the freeway alternative. These impacts will include additional development further from the urban core, additional vehicle miles of travel that otherwise would not occur, and increased reliance on the automobile. The DEIS also does not include enough information on the origins and destinations of travel trips south of Highway PD. Additional information must be provided to adequately consider the types of trips utilizing the Verona Road corridor, and the split between regional trips and local trips, and the external to external, external to internal and internal to internal trips along this corridor. The City requests that WisDOT provide the definition/clarification of the three types of trips addressed, e.g., regional, metropolitan and local. This information should be provided to local

units of government and the public participation process should consider this additional critical information prior to the FEIS being approved.

15. The City requests WisDOT to identify the transit alternatives that were considered in the Verona Road Corridor.
16. The City request WisDOT to provide to the Common Council and Long Range Transportation Commission available information as it related to emissions and pollution (specifically ozone impacts).
17. ** The FEIS should commit to improvements in the Allied Drive neighborhood area beyond the normal policy of one quarter mile from the corridor to help mitigate impacts to this neighborhood from the project and to help meet the Department's Environmental Justice obligations in the neighborhood.

- **U.S. Highway 12/14 (the West Beltline Highway) from Todd Drive to U.S. Highway 14**

1. The City of Madison supports Alternative A ~~B~~ (the ramp meters and auxiliary lanes ~~and a third lane added in each direction~~) provided that adequate right-of-way is maintained to accommodate future high capacity transit service along the corridor.
2. ** The City requests that the FEIS include an acknowledgement that the WDOT will construct noise barriers between Verona Road and Mineral Point Road if requested by the City of Madison.
3. The FEIS should include a complete listing of the plans considered during the preparation of the FEIS, including the City's Peripheral Area Development Plan and all adopted neighborhood development plans.
4. ** The FEIS must include a commitment to address aesthetic improvements along the U.S. Highway 12/14 corridor and include a high level of aesthetic treatment and context sensitive architectural design and landscaping for all investments made along the corridor.
5. ** The DEIS recognizes that the West Beltline Highway is both a major transportation facility serving the Madison Metropolitan Area and, at the same time, a major barrier which has prevented the construction of a fully-connected and integrated grid system of local collector and arterial urban streets to serve the greater west side. As such, additional crossings of the West Beltline Highway must be committed to as part of the FEIS and the Beltline itself will need to be fully utilized to accommodate metropolitan traffic. The DEIS indicates that the Mineral Point Road interchange will be reaching capacity and that improvements will be needed. The FEIS must provide a commitment by the Wisconsin Department of Transportation to participate in an area-wide long-range regional study of Beltline interchanges, in particular, the Mineral Point Road interchange and west side major arterial and collector streets to explore all options to meet the transportation needs of the area, including the consideration of grade separated intersections and additional Beltline crossings.
6. ** The City requests that the Junction Road Overpass be considered a part of this project vs. a stand-alone enhancement project.

7. The City requests WisDOT to conduct a traffic modeling evaluation of the freeway alternative, one modeling the removal of the Summit ramps and one model run leaving them in, and ensure that the traffic modeling effort includes a larger geographic area (which includes local streets in the vicinity).
8. The FEIS must fully analyze the impacts of the project on roadways connecting the Beltline Highway to the downtown Central Business District.
9. The City requests WisDOT to evaluate all of the traffic impacts caused by the freeway alternative and the additional lanes proposed for the West Beltline. In particular, the traffic impacts on the Beltline (between Rimrock Road and Mineral Point Road) and other roadways in the Mineral Point Road area should be evaluated.
10. ** The City notes in its review of the DEIS that USH 12/14 between Old Sauk Road and Mineral Point Road is proposed for auxiliary ramp lanes in both directions; however, noise issues related to this segment have not been addressed. The City requests WisDOT to expand the extent of its noise analysis and include noise mitigation in the FEIS Document. Specifically, any lane additions, including auxiliary ramp lane additions, be reviewed for noise impacts and mitigation measures provided and committed to.

- **U.S. Highway 12/14-Additional Crossings of the Beltline**

1. ** The City of Madison supports the additional grade separated crossings of the Beltline identified in the DEIS. The following priority should be placed on these projects:
 - a. Watts Road extension under the Beltline connecting to Research Park Boulevard.
 - b. Wal-Mart to West Towne crossing.
 - c. Struck Street crossing.
 - d. D'Onofrio Drive crossing.

The FEIS must commit to undertake detailed follow-up studies of the Beltline crossings (including an evaluation of the traffic impacts the new crossings will have on area local streets), and should prioritize these crossings for construction prior to the Verona Road/West Beltline Highway interchange project. These crossings should be funded by the WDOT.

2. ** An additional study of the Mineral Point Road/West Beltline Highway interchange as part of the follow-up study mentioned under the previous section, should be committed to in the FEIS.
3. ** The FEIS should acknowledge the impacts on the Madison Metro transit system as outlined in the attached comments, and should commit to mitigating these impacts.
4. The City requests WisDOT to conduct an evaluation of reconnecting Hammersley as an east-west connector, including an evaluation of all the impacts on the Southwest Bicycle Path.