

Trowbridge, David

From: George Perkins [geoperkins@yahoo.com]
Sent: Friday, December 10, 2010 6:35 PM
To: Trowbridge, David
Subject: Verona Road / US Hwy 151 SDEIS comments for City of Madison
Attachments: CommentsVeronaRoadSDEIS.pdf

David,

The first time I sent this I had mistyped your e-mail address. So I am re-sending. This is in reference to the Verona Rd agenda item on the 12/9/2010 LRTPC meeting. I also sent this to my city alder (and cc'd the rest of the council). Thank you for your service to Madison,

Sincerely, George Perkins

The proposed Verona Road upgrade price tag is too high, and it is shrugged off as a "normal" cost of transportation. The design is business-as-usual, giving priority to vehicle speed and traffic volume, at considerable cost and with negative consequences for the environment and the social fabric of our neighborhoods.

After reading the Wisconsin DOT SDEIS I conclude nine points. Here is a summary:

1. There is a philosophical disconnect (between "life" and "engineering") in the plan.
2. Individual choices (to not travel to the destination at all, to consolidate trips, to live closer to the destination, etc.) require no highway construction. This behavior would save state tax payers over \$520 million.
3. The plan needs more and increased cross connections over and under. Make them beautiful and livable and an asset to be enjoyed. Ideally the U.S. Highway 151 would disappear altogether, leaving a friendly, walkable residential street grid.
4. Details for the construction during stage 2 (overpass at County Highway PD) are missing and need further clarification.
5. Transportation Demand Management (TDM) is given inadequate emphasis and the comparison is faulty. TDM, if funded at a comparable level to construction, would solve more problems than it is credited to do.
6. Numerically the \$502 million cost translates into \$6.75/ trip (by one calculation) and \$0.58/ trip (by another). These differing results are not in agreement, so the actual cost estimates must be equally faulty. By another measure, the project will cost \$84 per trip-second of increased traffic volume.
7. The SDEIS discounts Madison Metro as unable to reduce traffic volume on this freeway. However, if Madison Metro was given \$502 million I bet we'd have a pretty terrific non-SOV solution.
8. The SDEIS discounts light rail as unable to reduce traffic volume on this freeway. For \$502 million a light rail from Verona to Shorewood Hills (connecting to an east-west light rail) would dramatically reduce SOV volumes. The plan ignores this apples-to-apples comparison, choosing instead to compare apples-to-oranges and assume only the east-west light rail.
9. Insufficient planning has gone into what will happen during construction (detours, closures, etc.). Past examples of poor planning for detours by WI DoT on US Hwy 12/18 at Rimrock Road created barriers and unsafe routes for pedestrians and bicyclists. These factors need to be identified in advance.

Attached is a detailed evaluation of the above points.

This \$502 million two mile expressway doesn't even solicit a yawn from the vocal minority interested in reducing the size of government and decreasing taxes. And there are billions more planned for road expansion. The silence from the "tea-bagger" faction is deafening.

In comparison, light rail in the region or high speed rail between Milwaukee and Madison draws howls of protest from the right-wing of the political divide even though the cost of any proposed rail project is less than a single expressway interchange or interstate expansion.

The city of Madison should oppose the current plan for US Hwy 151 / Verona Road and request revisions requiring a sustainable transportation solution.

Sincerely,

George Perkins
442 Toepfer Avenue
Madison, WI 53711

Introduction

"Comments on the SDEIS are encouraged from all members of the public and are due by Friday, December 17, 2010." <http://www.dot.wisconsin.gov/projects/d1/verona/index.htm>

These are comments on the supplemental and draft environmental impact statement (SDEIS/DEIS) reports for the Dane County US 18/151 (Verona Road) corridor. I provide them in three parts: priorities, specifications and omissions.

The proposed Verona Road upgrade price tag is too high (\$502 million), and it is shrugged off as a "normal" cost of transportation. The design is business-as-usual, giving priority to vehicle speed and traffic volume, at considerable cost and with negative consequences for the environment and the social fabric of our neighborhoods.

There is a philosophical disconnect (between "life" and "engineering") in the SDEIS/DEIS assumptions so it is difficult to comment the SDEIS/DEIS since the points would be moot if natural life were the priority (instead of the "conventional" preferences for steel, concrete, and fossil fuel consumption). However, I have taken the time (in parts 2-3, which follow) to point out errors in specificity and detail that are present in the SDEIS/DEIS.

By George J. Perkins
Madison, WI
December 5, 2010.

Part 1: Priorities

If one were to review the role of civil engineer, we could agree that improving the status of humankind is the ethical imperative of the profession. Persons are improved not when their automobile moves through a 2.2 mile stretch of highway faster, but rather when they breathe and enjoy a happy and natural life.

Who, after all, is this freeway "improvement" for? It is for people (that is to say, individual persons). People who naturally exist, breathe, converse, learn and grow within the social fabric and environment we call "life".

From our origins we walked (or otherwise used muscles), then harnessed animals to use their muscles, then ultimately replaced the animals with devices that burned fossil fuels for transport and other work. We are therefore historically and evolutionarily most concerned about our bodies (muscles) and immediate surroundings. These are the true values of people and where we draw satisfaction in life. As politicians, planners, engineers and students, the basis for our service to humankind is then to enable the most basic of human needs: to exist and breathe. The priority of the Verona Road freeway project therefore needs to keep this in mind: the project will ultimately provide support to meet needs and wants of individual people, but most essentially at a scale perceived from the perspective of a human person's respiration and pace. This is

the true natural order of things.

The natural order when translated to a transportation project is as follows:

1. Safety
2. Social and Environmental Factors
3. Cost
4. Traffic Volume
5. Traffic Speed

It is perplexing that the SDEIS/DEIS concludes something different, prioritizing the project this way:

1. Traffic Speed
2. Traffic Volume
3. Safety
4. Social and Environmental Factors
5. Cost

So in other words, the SDEIS/DEIS has first assumed that all traffic must travel at speed for a projected volume. Once those parameters are set, then it has been a matter of weighing designs that meet the speed and volume requirements, modifying slightly to mitigate for safety with social and environmental concerns (given a small weight) and, finally, to attempt to reduce overall cost (which it turns out is ridiculously expensive). If the project were to be designed with natural human needs as priority, then safety, social and environmental factors and cost would come before speed and volume.

This long introduction brings me to my first comment about the SDEIS/DEIS: It is that a project that is upside-down and backwards in its priorities and sensibilities. Instead, if the Wisconsin Department of Transportation delivered what society asked, it would build our transportation systems to be safe and kind to the social and natural fabric we call life. Only then would engineers consider what could be done, given a budget, to handle a higher volume of motor vehicles at greater speeds.

Part 2: Specifications

"2-mile section of Verona Road" ... "average intersection delays exceeding 100 seconds per vehicle..." P. ES-3

It just doesn't matter! I cannot fathom how 100 seconds is being taken so seriously. Is 100 seconds really an issue worth so much consideration and discourse? I can imagine several much more important issues which do merit extensive discussion and debate on how to best encourage a happier life. Namely, to avoid a commute trapped in a steel and plastic cage.

Individual choices (to not travel to the destination at all, to consolidate trips, to live closer to the destination, etc.) require no highway construction. Or alternatively, consider the cost of a 100-second delay to all travelers and ask, "Does this really matter?" Is it worth over \$500 million to create a concrete temple to a

faster commute which saves 100 seconds?

"[N]eighborhood connectivity is improved by extending Carling Drive, which provides an additional connection between Allied Drive and the Nakoma Heights area. Stage 1 will also provide two new connections underneath Verona Road, one connecting Carling Drive to Freeport Road and one connecting the west frontage road with the east frontage road near Summit Road (as part of the jug-handle)." ... "The Beltline bridge pedestrian overpass structures just east and west of the Verona Road/Beltline interchange will remain and the structure to the east is replaced during Stage 1 and improved to meet current standards..." P. ES-12

If a person's breath and pace are truly important, then it is the neighborhood connectivity that needs the greatest priority. It should benefit from traffic calming measures (none of which are proposed), and new inviting gateways of beautiful landscaping, sculpture, enveloping tree canopies that spread gracefully over the streets. The pedestrian-bicycle overpasses must have connections to paths (on both sides of the freeway) and destinations for walkers and bicycles (the Southwest Commuter Bike Path already does this, but could be enhanced by offering better east-west connections).

The concentrated flow of high speed motor vehicles through and between the neighborhoods is like a knife in their hearts. If neighborhood connectivity is an actual goal of the project, then YES!, let's have more and increased cross connections over and under. Make them beautiful and livable and an asset to be enjoyed. Those enumerated in the plan are inadequate. More and better-designed interconnections are required. Ideally the U.S. Highway 151 would disappear altogether, leaving a friendly, walkable residential street grid. Any progress toward that ideal is the responsible plan. Anything less lacks vision and is ultimately immoral and a failure.

"Environmental justice" ... "Installing bike lanes and sidewalks on all frontage road and neighborhood roads being constructed in Stages 1 and 3." P. ES-16

Absent this reference to environmental justice is the plan for construction during stage 2 (overpass at County Highway PD). Improved "complete streets" design and construction of pedestrian and bicycle facilities at the PD crossing is essential. Where are the environmental justice details for stage 2? The (SDEIS/DEIS) cannot be considered final until stage 2 is addressed. Another round of public input on stage 2 will be necessary.

"Through the screening and evaluation process, all nonhighway strategies were determined to be ineffective in addressing the project purpose and need, i.e. lowering traffic volumes or increasing capacity to bring about the required levels of service. A detailed description of how each alternative was evaluated against the purpose and need is described in Appendix A ... Transportation demand modeling showed high transit alternatives, such as that being proposed by the Transport 2020 process, was only able to remove 2 to 3 percent of the traffic from the Beltline. These transit measures removed even less traffic from the US 151 corridor, leaving the current highway congestion and mobility concerns. TDM measures implemented at realistic levels produced similar results." P. 1-11

The transportation demand management (TDM) analysis is flawed because it draws upon false assumptions. The Transport 2020 and other transit plans referenced all fail to address the root causes of the dilemma (prosperity measured by unending consumption and growth coupled with dependency on fossil-fueled motor

vehicles and unsustainable sprawl).

More conventionally, the Transport 2020 and other transit plans all offer solutions based on lack of leadership, lack of funding, and limited vision. If funded at the same rate per mile as the proposed highway project's funding levels, the nonhighway TDM options would have a significant impact. TDM solves capacity problems if actual commitments were proposed to employ them.

As written, the SDEIS/DEIS is a self-fulfilling prophecy. Real TDM solutions that include a vision of simplified, sustainable economies based on electrified rail, denser urban areas coupled with rural agrarian life vs. exurban commuter consumer-oriented existence would envision a far different future for this transportation corridor. In other words, instead of spending \$500 million on a 2.2 mile freeway, we should be creating and planning for a no-fossil fuel, no-commute model of life that is sustainable.

Some may dismiss such thoughts as utopian, but even if the current limited TDM plans were funded at a rate per person-mile as is the Verona Road freeway project, they would be successful far beyond the "realistic levels" noted in the SDEIS/DEIS.

"TDM experiences have shown that TDM programs at individual employment sites can reduce vehicle trips by up to 30 to 40 percent and is very cost-effective. For example, the daily cost of accommodating each additional single occupant vehicle on a crowded highway network is about \$6.75 each way. High occupancy vehicle travel can save substantially." P. A-7

"[T]raffic volumes on sections of Verona Road were 50,750 to 59,300 vehicles per day (vpd), and they are projected to grow to 53,700 to 69,000 vpd by the year 2030." ES-3

"Anticipated Cost in Year of Construction ... \$502.5 Million..." ES-9

It is tragic that portions of the plan's purely numeric analysis seem to be ignored. Even when favorable alternatives exist they have been discarded and discounted. Using the plan's own numbers it is easy to make a case against it in favor of other less costly alternatives.

(I will use the SDEIS/DEIS's numbers to make my points; however if I were to question the plan's figures my arguments would be made ten-fold stronger by including externalized costs associated with ownership and use of a motor vehicle and the corresponding negative impact on society.)

Without so much as stating it, combining these (above, quoted) several statements, the report can be read to conclude mathematically:

Take at face value the \$502,500,000 / \$6.75 each = 74,440,000 trips to pay for the cost of the planned 2.2 miles for reconstructing the freeway. There are expected to be 59,300 trips per day, so it would take $74,440,000 / 59,300 = 1255$ days (3.5 years) for the project to pay for itself. Is there going to be a \$6.75 per trip toll booth included in the project? After 4 or 5 years the toll would then be re-directed towards operations maintenance, presumably. But the SDEIS/DEIS does not address user fees.

Projected cost is \$502,500,000 for 2.2 miles. In year 2030 forecast are 59,300 trips/day * 365 days/year = 21,600,000 trips/year. What is the lifespan of the completed project before major reconstruction? 20 years?

40 years? So $\$502,500,000 / 21,600,000 \text{ trips} = \$58.15/\text{trip-years} / 20 \text{ years} = \1.16 . (Or \$0.58 for a 40 year freeway). The toll just went down! Drop a few quarters in the toll both hopper for 2.2 miles anyone? But the SDEIS/DEIS does not address the obvious user fee opportunity.

If congestion is costing up to 100 seconds additional wait time per trip and that 59,300 trips per day are expected, the project is not actually being built for travel capacity (59,300 trips/day) but rather to improve each trip by 100 seconds each. Or stated mathematically $100 * 59,300 = 5,930,000 \text{ trip-seconds}$. $\$502,500,000 / 5,930,000 = \$84 \text{ per trip-second}$. Or \$5,040 per hour. The SDEIS/DEIS does not justify this hourly travel rate.

"Madison Metro is starting to implement Intelligent Transportation Systems (ITS) that will improve transit quality and operations. Current ITS applications being investigated and pursued will allow Madison Metro to track bus locations and give customers access to real time information on when their bus will arrive at the bus stop. While these initiatives improve the quality of transit service to the Madison area, they will only incrementally increase transit ridership. Therefore, these initiatives are not expected to substantially affect Beltline or Verona Road traffic volumes or decrease Beltline congestion levels." P. A-9

If Madison Metro were funded at an increased \$6.75 per trip (see above) you can bet they'd design a bus system that would dramatically reduce the need for a new Verona Road U.S. Highway 151 segment. I leave it up to Madison Metro and the new Regional Transportation Authority to comment on how they might use \$500 million to improve transit quality and operations and offset the congestion on a 2.2 mile stretch of any freeway in the area. The SDEIS/DEIS shouldn't dismiss Madison Metro so casually and without actual data to do so.

"The effect of commuter rail or other high capacity transit options to Beltline traffic will be small. Traffic modeling performed by the Regional Planning Commission (RPC) and the MPO indicates that a high capacity transit option traveling through the Isthmus would draw from 1500 to 3600 vehicles per day from the Beltline. This amounts to 2 to 3 percent of the traffic the Beltline currently carries. So while high capacity transit alternatives have merit to addressing some of Madison's transportation challenges, they provide minimal benefit to Beltline traffic and congestion." P. A-10

This is comparing apples and oranges. A light rail from Middleton to the American Family Insurance office complex on the east side through the Isthmus is not the direction of travel on Verona Road / Hwy 151 covered by the SDEIS/DEIS. The question is: how many vehicles would be removed from Verona Road / Hwy 151 if a light rail was constructed between Verona and Shorewood Hills? Especially interesting question if that rail connected to a transportation hub at the intersection of Midvale Boulevard and University Avenue, providing a linkage from the south to the east and west? Why not spend \$500 million constructing the rail right down the median of Highway 151 and up Midvale Boulevard instead? Shouldn't the project be envisioning actual solutions instead of designing a freeway upgrade with minimal benefit?

Part 3: Omissions

There are "at construction-time" details missing. These kinds of details (and I can only hazard a few as they spring to mind) deserve development in an SDEIS/DEIS, a hearing with public comment, and refinement before a FEIS.

The public is left to ad-hoc "solutions" to design and construction problems that arise during the chaos of construction. Surely there are standards and best practices which can be identified in advance? Detours are one such problem which can be addressed now.

A driver of a motor vehicle is considerably less inconvenienced by urban detours than are pedestrians and bicyclists. With this in mind, I have some questions:

1. Where will detours be placed?
2. What existing paths, sidewalks, signals, signage, enforcement, streets and lanes will be upgraded to accommodate the official and unofficial detours?
3. Is there an acceptable detour distance for all transportation users? How does a pedestrian or bicyclist bypass a missing intersection or bridge?
4. Is it fair to remove a pedestrian overpass (for example) and cause that person on foot to walk additional 1/2-miles, 1-miles, or further to reach their destination?
5. What is considered when detours are selected? Safety? Inconvenience? Barriers? Transit options? Pollution? Noise? Rain water runoff?

An entire section of the SDEIS/DEIS seems to be missing! Answers to these, and other construction-time details should be addressed in the SDEIS/DEIS.

An example illustrates my point: I bring these elements up now because they plainly were lost when the details of construction were planned for the Park Street / Highway 12-14-18 / Rimrock Road / Badger Road overpass construction project in 2010. The situation is cruel to the people who live and commute in the area. It is a lesson to be learned from and to not repeat.

The Badger pedestrian/bicycle overpass traffic did not have a pedestrian or bicycle detour. The unofficial detour is the Rimrock Road bridge. This bridge lacks sidewalks on both sides of Rimrock Road. None of the signals contain pedestrian actuator buttons. South-bound pedestrian/bicycle traffic cannot see the motor vehicle signal lights. And there is no signage or warning indicators to motor vehicles of increased pedestrian or bicycle use. The "detour" is 1-1/2 miles out of the way, a complete barrier to most pedestrian travel. The speed of motor vehicles (coming off or going onto freeway ramps) is so fast as to make the sidewalks and bike lanes hazardous. Freeway interchange projects inconvenience all modes of transportation. Yet somehow the pedestrian and bicyclist was overlooked and omitted from the detour planning on the Park Street / Beltline / Highway 12-14-18 interchange. Had the project included safety upgrades to Rimrock Road for proposed pedestrian / bicycle detours, these problems would have been minimized or avoided.

Regrettably, there is no construction detour plan in the SDEIS/DEIS to assist the public understand construction-time impacts and what upgrades need to be made in advance.

Besides construction-time planning (detours are but the most obvious example), there are other details

omitted from the SDEIS/DEIS (which may be covered by design standards or regulations, but not obvious in their applicability or implementation on Verona Road).

Some of these details are often the most important element from the perspective of a human being on foot or riding a bicycle. So, do not lose sight of these essentials:

1. All signals provided to include pedestrian actuator buttons and crosswalks to be clearly visible to motor vehicles. Can I see what the designers propose so I can comment on it?
2. Sidewalks and crosswalks available on all sides and for all directions of travel?
3. Pedestrian and bicyclist lanes, crossings, refuge islands, etc. visible from all directions?

Conclusion

Thank you for the opportunity to provide input and feedback.



December 9, 2010
Long Range Transportation Committee
• David Trowbridge

Mr Trowbridge,

The Orchard Ridge Neighborhood Association (ORNA) wishes first to echo and emphasize our support for the concerns and positions of our neighborhood friends in Dunn's Marsh, Allied. Meadowood, and Williamsburg Way areas. In particular, we support their concerns about increasing noise, increasing traffic, increasing pollutants, and generally support their concerns that the construction of this corridor will cause significant degradation of the neighborhoods along the Verona and the West Beltline.

The residential areas of Orchard Ridge may not be impacted as immediately and directly as the other neighborhoods bordering on this corridor, at least in the early phases of its development, but, aside from affecting our friends and colleagues in these other neighborhoods, one aspect of the SDEIS plan is of specific concern to us. The Carling Drive/Freeport Road Underpass Connection.

The SDEIS plan does not address, nor mention, any of the concerns raised by ORNA over the years and in the many meetings we have attended on this issue. In particular, we have significant concerns over the potentially (likely?) substantial increase of traffic through the Orchard Ridge residential neighborhood, causing significant degradation of the Orchard Ridge area, and impacting directly the West Beltline Frontage Rd, Freeport Rd, Reetz Rd, Black Oak Dr, Flad Ave and Knox Ln. In particular, the SDEIS does not include traffic studies regarding this underpass as it would affect Orchard Ridge (and concomitantly, Dunn's Marsh and Allied) and which would inform the community, the City and WiDOT of the underpasses' impact.

"The Carling Drive-Freeport Road connection allows residents of the Allied Neighborhood and Nakoma Heights area to travel across (sic) under Verona Road and access other neighborhoods without going through the Summit Road and Verona Road roadway **construction**." ¹(my emphasis)

One may infer from the above quote that this connection was meant to be temporary, during **construction**, perhaps based on the 2004 DEIS and its timeline, and to accommodate ready access to Cub Foods, the grocery store in the area at that time. With the closing of Cub Foods in the spring of 2009, and no replacement grocery store on the horizon, an important purpose for this connection seems to have disappeared. Regardless, however, this connection under the 2010 SDEIS will

¹ SDEIS, Vol 1, page 2-14

not be temporary, but be extant until Phase III planned for 2030, a period of at least 17 years, and will therefore have considerable impact over a prolonged period of time. We strongly urge that the Carling Drive/Freeport Road Underpass Connection be eliminated from the project pending a traffic impact study, and the development of solutions which maintain the quality of the Orchard Ridge neighborhood.

We appreciate and support the City of Madison Comments of 09-Dec-2010 (Comments), section Carling Drive/Freeport Road Underpass Connection, and would request inclusion of Orchard Ridge neighborhood's concerns in the City's comments, City support for an analysis of this proposed connection's impact on Orchard Ridge, and City support for solutions which address these concerns. We would also suggest that last line of paragraph 5 of Comments be modified in part to read:

".... The City of Madison looks forward to working with WiDOT and the affected neighborhoods during the final"

Sincerely yours,

Lawrence Winkler, President

Orchard Ridge Neighborhood Assoc