

From: [Stouder, Heather](#)
To: [Cleveland, Julie](#)
Cc: [Parks, Timothy](#)
Subject: FW: opposition to Edgewood sports facilities plan
Date: Tuesday, December 1, 2020 12:04:05 PM

From: David Gulisano <dgulisano@gmail.com>
Sent: Tuesday, December 1, 2020 12:03 PM
To: Stouder, Heather <HStouder@cityofmadison.com>; All Alders <allalders@cityofmadison.com>; Mayor <Mayor@cityofmadison.com>; Evers, Tag <district13@cityofmadison.com>
Subject: opposition to Edgewood sports facilities plan

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Dear Madison Alders, Ms. Stouder, and Mayor Rhodes-Conway,

We are writing to you to express our opposition regarding Edgewood High School's plans for their sports stadium/facilities. More than a year ago, many Madison residents and groups voiced their concerns regarding the plans Edgewood High School had to expand the use of their stadium to include more games, including night time use with lights and amplified sound. As residents of the neighborhood, we were very worried about the impact that these changes would have on the parking/traffic, pedestrian safety, noise levels, property values, and wildlife/environment in close proximity of the stadium. As recently as May, the Madison Plan Commission voted 7-1 *against* Edgewood High moving forward with their plans, recognizing that Edgewood's plans would likely have substantial negative impacts on the neighborhood and surrounding areas.

The approval Edgewood now seeks - DESPITE previous long-standing and strong opposition by the Plan Commission and many Madison residents, neighbors, and groups including environmental groups alarmed about the environmental impact on nearby Lake Wingra and the UW Arboretum - raises the same problems that Edgewood's previous stadium expansion attempts raised: a schedule of 25 games in the regular season, plus an unspecified number of postseason night games, plus unlimited lighted nighttime practices until 7:00 PM and unlimited day games, plus usage based on "[their] needs," starting in 2022-2023 and beyond continues to have major negative implications for the area residents and environment.

What was true seven months ago when the Madison Plan Commission made their overwhelmingly clear decision to vote down Edgewood's stadium plans still stands true now: an increased number of Edgewood stadium events with traffic, noise and lights will have a very meaningful impact on the safety, environment, and livability of the neighborhood surrounding Edgewood - a neighborhood where we live with our family. Having recently survived a year of Monroe Street construction detours through our neighborhood, the residents of this area keenly understand what increased traffic looks like and the impact it has on our quality of life and the safety impact it has on our families. Parking is already a routine challenge in this area on a typical day between the parking for West High, Edgewood, and the use of Camp Randall in the fall -- it is hard to envision where more parking will get pushed for vehicles associated with even more events (and no limits to how many) at

the Edgewood stadium. Several Madison environmental groups have expressed their concern regarding the impact the resulting traffic, light pollution and noise could have on the nearby environment, and our family shares this concern.

Quite frankly, we are shocked and disgusted that a private school's desire to have fancier sports facilities (this is not a NEED but a WANT) should outweigh the significant potential negative impact that these facilities will have on thousands of families and the surrounding environment. It is equally despicable that Edgewood High feels that it is acceptable to *AGAIN* try and push through their stadium agenda while so many others in this city and in our world are distracted by the chaos and tragedy of a global pandemic. Nothing we have heard proposed by Edgewood so far sufficiently addresses our family's concerns in these areas, therefore we remain opposed to Edgewood's proposed sports facility plans.

Thank you for your time and consideration of our concerns,
Rebecca Minsley and David Gulisano
431 Virginia Terrace

Sent: Monday, November 30, 2020 8:23 PM

To: Planning <planning@cityofmadison.com>; Evers, Tag <district13@cityofmadison.com>; Mayor <Mayor@cityofmadison.com>; heatherstouder@cityofmadison.com; All Alders <allalders@cityofmadison.com>; yael Gen <mizgen@gmail.com>

Subject: Edgewood Stadium, please upload to Legistar #60646

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Dear Planning Commission,

We write again to oppose Edgewood High School's request to appeal the Commission's decision of last spring. It is apparent that Edgewood has not taken to heart the suggestion by the Commission that it determine the adverse impacts of daytime sound before moving to install sound and lighting for nighttime events. Edgewood continues to press forward for its desired outcomes and apparently will continue to do so into the future. The only way that the neighborhoods can retain quality of life around Edgewood is to be constantly responding to Edgewood's efforts to get what it wants over the long term. Because of numerous actions on the part of the High School to ignore or go around requests of and agreements with the neighborhoods, we have no faith that Edgewood will stick to their proposals for the future of the stadium. Proposals Edgewood has made in the past are already being expanded in their current proposal. We believe that if the Commission accepts their appeal, there will continue to be efforts on Edgewood's part to modify, adjust, expand, and overturn limits. We fully expect that the school would continue to add games and events to their schedule and would eventually accept payment from other groups to use the stadium beyond the limits set on the school.

Edgewood has not demonstrated that there would not be negative impacts on the neighborhood by use of sound or lighting of its field, and it has not proposed mitigating measures to limit those impacts. We request that the Plan Commission reject the school's appeal of the Commission's previous decision, and we encourage the Plan Commission to advise the school that the field remain a practice field only.

Sincerely yours,

Janet and Doug Laube
2025 Jefferson Street
Madison, WI 53711

One block from Edgewood campus, two blocks from practice field

From: [Stouder, Heather](#)
To: [Cleveland, Julie](#)
Cc: [Parks, Timothy](#)
Subject: FW: Please uphold the Plan Commission's decision on stadium lights
Date: Tuesday, December 1, 2020 11:37:59 AM

From: David Leeper <daveleeper@gmail.com>
Sent: Tuesday, December 1, 2020 11:37 AM
To: Stouder, Heather <HStouder@cityofmadison.com>; All Alders <allalders@cityofmadison.com>; Mayor <Mayor@cityofmadison.com>; no new stadium info <nonewstadiuminfo@gmail.com>; Evers, Tag <district13@cityofmadison.com>
Subject: Please uphold the Plan Commission's decision on stadium lights

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Dear Alders,

I ask you to please uphold the Plan Commission's decision denying lights for the Edgewood stadium.

I live on Terry Place- one block removed from the EHS practice field. I have been a neighbor for over 25 years and have always respected and appreciated Edgewood as a neighbor. This is becoming more and more difficult.

I don't know how many more times I need to write or participate in community and government forums to protect our neighborhood, but Edgewood High School's withdrawal from the master plan and request for lights is an important issue that will affect our neighborhood for generations so I do not plan to give up. People come to Wingra Park at night to observe meteor showers and other dark-sky events; children, and elders, like myself, often go to bed early; the corner of Monroe and Woodrow is simply not the right place to build a stadium.

You know the history. In 2015 the EHS promised they would never play games or ask for lights- because it would never be accepted by the neighborhood. They were right. The Plan Commission was created to decide difficult development issues like the EHS request and they have decided- unanimously- that the lighted stadium is bad for our neighborhood and bad for Madison.

I ask you to support this decision. Not only will you be protecting a neighborhood, park, and lake, you will be supporting the Plan Commission in its very difficult work. Unless you want to decide every difficult and divisive issue yourselves, you need to respect the Commission and support its decisions.

It is time to stop this bad idea once and for all. You may be tempted to think it will all be over if you just give EHS what they want- but it won't. Lights and games at the corner of Monroe and Woodrow will lead to years of struggle and hostility, and it does not have to be this way.

I hope you will vote to support the Plan Commission and deny the EHS request for lights.

Thank you,

Dave Leeper

Attorney David D. Leeper
Leeper Law and Mediation
(608) 238-7177
daveleeper@gmail.com

From: [Stouder, Heather](#)
To: [Cleveland, Julie](#)
Cc: [Parks, Timothy](#)
Subject: FW: Edgewood Request
Date: Tuesday, December 1, 2020 2:33:38 PM

-----Original Message-----

From: Gail <gail_glasser@yahoo.com>
Sent: Tuesday, December 1, 2020 2:28 PM
To: All Alders <allalders@cityofmadison.com>; Mayor <Mayor@cityofmadison.com>; Evers, Tag <district13@cityofmadison.com>; Stouder, Heather <HStouder@cityofmadison.com>
Cc: Ethan Brodsky <ethan.brodsky@gmail.com>
Subject: Edgewood Request

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Edgewood High School's Mission Statement: Edgewood, a Catholic high school, educates the whole student for a life of learning, service and personal responsibility through a rigorous academic curriculum that embraces the Sinsinawa Dominican values of Truth, Compassion, Justice, Community and Partnership.

It's hard to see that mission or stated values in the combative proposals being pursued. Moderate, respectful provisions have been suggested by neighborhood associations to no effect. Let's hold out for mission-statement-consistent efforts.

Sent from my iPhone

From: [Stouder, Heather](#)
To: [Cleveland, Julie](#)
Cc: [Parks, Timothy](#)
Subject: FW: the new Edgewood proposal
Date: Tuesday, December 1, 2020 2:07:33 PM

From: Susan O'Leary <orfam1@gmail.com>
Sent: Tuesday, December 1, 2020 1:48 PM
To: All Alders <allalders@cityofmadison.com>; Mayor <Mayor@cityofmadison.com>; Evers, Tag <district13@cityofmadison.com>; Stouder, Heather <HStouder@cityofmadison.com>
Subject: the new Edgewood proposal

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Dear alders,

Thank you for the time you spend and the commitment you all make and have made to our city by serving as alders.

I am sorry to be writing to you again about the Edgewood stadium proposal as I think there are much more important things for you to be attending to in these times than another proposal about the stadium.

I live on West Lawn Avenue, very close to Edgewood High School. I believe compromise and working together are important for people who live and otherwise spend time in a neighborhood. Our neighborhood committee that was meeting with Edgewood came up with a plan that would allow Edgewood to install lights, but instead of working together with residents, Edgewood is proposing to you a 'compromise' plan that actually *increases* the number of games they want played in the stadium - with no shift in their plan for lights.

Edgewood has broken trust with our neighborhood over and over on this issue. They should not be asking you to overturn the 7-1 vote by the Plan Commission.

Please ask them to work in good faith with their neighbors. Please reject their appeal tonight.

Thank you.

Susan O'Leary

From: [Stouder, Heather](#)
To: [Cleveland, Julie](#)
Cc: [Parks, Timothy](#)
Subject: FW: legistar #60646 re EHS appeal
Date: Tuesday, December 1, 2020 2:06:14 PM

From: Dianne Jenkins <jenkins2125@gmail.com>
Sent: Tuesday, December 1, 2020 2:00 PM
To: Evers, Tag <district13@cityofmadison.com>; All Alders <allalders@cityofmadison.com>
Cc: Stouder, Heather <HStouder@cityofmadison.com>
Subject: legistar #60646 re EHS appeal

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Please consider the following in your deliberations about the Edgewood High School appeal of the 5/11/20 Plan Commission decision regarding its application for lights on its athletic field (legistar file #60646).

First, in considering a CUP application, the City is not bound to simply requiring compliance with ordinances; otherwise the conditional use process would be effectively meaningless. In addition to the City's noise ordinances 24.04 and 24.08, the Approval Standards for a Conditional Use Permit (CUP) effectively constitutes a separate noise ordinance, which Edgewood's application does not meet.

Second, Subchapter 28J of the Zoning Code, Supplemental Regulations (specifically 28.151) is relevant and should be applied to this application, as it allows for conditions to be imposed that address the unique characteristics of certain land uses. According to this regulation, neighborhood requests for limitations on noise and lighting are legitimate.

Common Council members may recall that both the Supplemental Regulations and the CUP Approval Standards generally have been applied in a conditional use context involving outdoor recreation (or outdoor eating). There are examples of decisions in which staff has recommended and the Plan Commission has granted a conditional use permit for outdoor recreation facilities conditioned on there being no amplified sound, including no music – whether amplified or ambient.

1. Applicable noise ordinances

Edgewood asserts it has met the city's noise ordinance requirements (24.04 and 24.08). However, the Approval Standards in fact constitute another and separate "noise ordinance" that allows, indeed requires, consideration of noise impacts and the imposition of noise limits as needed.

While city ordinances 24.08 and 24.04 may be helpful in understanding the City's policy concerns re noise impacts and noise pollution, they aren't a substitute for the requirement that the Approval Standards for a CUP be met - the former because not all noise sources are covered by that ordinance

and the latter because the Madison Police Department appears to have decided that it would forego enforcement of the ordinance if the use were permitted as a CUP (per email correspondence between MPD and Matt Tucker).

2. Supplemental Regulations (28.151)

Outdoor recreation is covered in the zoning code by supplemental regulations in 28.151 (c):
“The site shall be designed in such a way as to minimize the effects of lighting and noise on surrounding properties. Hours of operation may be restricted and noise and lighting limits imposed as part of the conditional use approval.”

This ordinance is most relevant to Edgewood’s application, as it addresses neighbor concerns about negative impacts of both noise and lighting on surrounding properties. Edgewood has proposed minimal restrictions on hours of operation; the neighborhood has proposed restrictions on both noise and light. The Plan Commission decision provides Edgewood an opportunity to engage in substantive discussions with the neighborhood to arrive at a mutually beneficial agreement that provides a way forward while minimizing negative impacts of noise and lights on the surrounding area.

Please uphold the Plan Commission decision and direct the applicant to work with the neighborhood associations representing surrounding properties to arrive at a mutually beneficial outcome.

Thank you,
Dianne Jenkins
1802 Monroe Street
Madison, WI 53711

From: [Stouder, Heather](#)
To: [Cleveland, Julie](#)
Cc: [Parks, Timothy](#)
Subject: FW: Proposed Edgewood Stadium
Date: Tuesday, December 1, 2020 1:27:06 PM

From: J MacDonald <consider.walking@gmail.com>
Sent: Tuesday, December 1, 2020 1:26 PM
To: Evers, Tag <district13@cityofmadison.com>
Cc: All Alders <allalders@cityofmadison.com>; Mayor <Mayor@cityofmadison.com>; Stouder, Heather <HStouder@cityofmadison.com>
Subject: Proposed Edgewood Stadium

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Tag Evers – District 13
Re: Proposed Edgewood football stadium
12/1/20

Dear Alder Evers -

Last week I went for a quiet stroll by Lake Wingra around sunset. I have lived on the corner of Vilas and Edgewood Avenues for seventy years and have done this many times before. It is a lovely walk. The efforts of many people over the years have kept the shore of this little lake grassy and wooded. It has a peaceful country feel. My walk was serene until a loud public announcement from some event at Edgewood came booming down through the trees and across the water. The mood was shattered.

I was reminded again of what will happen to our lovely park if Edgewood succeeds in building their football stadium. The Edgewood campus is on the shore of Lake Wingra. In fact the shoreline is only about 1300 feet from the location of the proposed stadium. There are many places where if you stand looking in one direction you will see the proposed stadium and if you turn around you are looking at the lake. Edgewood plans a conventional stadium public address system. The volume needed to penetrate the screams of football fans will certainly carry for many blocks. It will reach Wingra Park, only two blocks away, and carry out across the lake. The peace and tranquility of Vilas Park will be destroyed repeatedly, week after week, by the strident monologue of a football announcer.

Lake Wingra has become very popular for canoeing and kayaking. During the summer it is not unusual to see 20 or 30 small boats on the lake at dusk. People quietly paddle and drift watching the sun set and the stars come out. The Edgewood stadium will end this. Not only will the silence

be broken by the voice of the football announcer but the stars will be diminished as well. Edgewood proposes to put arena style lighting for the stadium at the top of 80 foot towers. In their plans the lights will not even be directed down to minimize light scatter. These towers are only 1300 feet from the lake and they will wash the sky with their light. In the future what has been a pristine quiet lake may seem more like part of a noisy amusement arcade.

I urge you to reject this stadium proposal one last time. This is the project that keeps coming back. The neighborhood has rejected it repeatedly through petitions and letter writing. This plan was rejected by the Madison Plan Commission in a seven to one vote. The Commission found it would impair or diminish the use, value, and enjoyment in the neighborhood. But the paid staff at Edgewood keeps searching for a way to circumvent the desires of the neighborhood and the Plan Commission. They bring back what is essentially the original plan again and again. Their repeated attempts have wasted the time of far too many people.

I urge you to reject this stadium proposal one final time.

James MacDonald

From: [Stouder, Heather](#)
To: [Cleveland, Julie](#)
Cc: [Parks, Timothy](#)
Subject: FW: Uphold the Plan Commission's decision, Vote NO on Edgewood's lighting application #60646
Date: Tuesday, December 1, 2020 12:56:26 PM

From: Nicol, John L. <JOHN.L.NICOL@leidos.com>
Sent: Tuesday, December 1, 2020 12:56 PM
To: All Alders <allalders@cityofmadison.com>
Cc: Stouder, Heather <HStouder@cityofmadison.com>
Subject: Uphold the Plan Commission's decision, Vote NO on Edgewood's lighting application #60646

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Dear Common Council,

I am desperately pleading with you to vote against adding Stadium lights to the Edgewood field for the following logical reasons that are supported by the Madison City code.

First the city staff did not really do an analysis of the code impacts and violations created by the adding lights to allow late night noise to penetrate surrounding residences. As an engineer with over 30 years of experience, their "Analysis" section is not really analysis but simply their personal belief based on a lack of true analysis. They did not even bring up the sound studies that have been done on the impact to the community which is a key consideration of the code compliance and the need to ensure the following needed code Standard be met:

3. The uses, values and enjoyment of other property in the neighborhood for purposes already established will not be substantially impaired or diminished in any foreseeable manner.

Sound studies have shown that the residences near the stadium WILL be **substantially impaired** by the broadcasting of the sporting events until 11PM. Imagine trying to eat dinner and have a conversation (let alone trying to get your young child to bed) with the constant blaring of some sports announcer making sure you know that some team just scored a goal, touchdown, or gained 4 yards on the play. Even as a life-long sports person, I would find this torturous 15+ times each year! The city code **24.08 - NOISE CONTROL REGULATION** pertains directly to the violation that approving these lights and subsequent use of the sound system into the night. It clearly indicates that "the policy of the City to prevent...excessive noise which may jeopardize the public health, safety, or welfare or which would cause harm to the property values..." Besides impacting the health and welfare of the neighbors, it is very clear that this type of stadium sound system noise well into the night will significantly **harm property values** (and taxes collected) for the homes near the Stadium. That includes the one that my wife and I own at 2354 West Lawn.

There is no debate that adding lights to the Edgewood Stadium WILL change the fabric and nature of the surrounding quiet neighborhood. Because we care about the neighborhood and our neighbors, we have great empathy for the 100+ families that live close to Edgewood. It does not take that much empathy to understand the great stress that the large noise late into the night from the Stadium will cause on these families. Many of the surrounding residences are smaller homes perfect for families with smaller children. These children go to bed well before 10 or 11PM.

Sports DOES NOT trump families and their neighborhood. Edgewood talks about how they are trying to use sports to teach the whole person. I have done many sports my whole life. The key tenant of good sportsmanship is to not injure someone else, just to win the game. This is exactly what Edgewood is trying to do. Win their game while hurting the families that live nearby.

Thanks for your consideration of my perspective. Please act to maintain the Madison code and sustain strong, quiet neighborhoods in Madison. It is what makes our city great. So please vote to reject Edgewood's selfish move to put up stadium lights and undermine the neighborhood they occupy.

And Thank You for your service to our community!

John Nicol
2354 West Lawn (Rental property)
1901 Commonwealth (Primary residence)

Please upload my letter to Legistar #60646

-----Original Message-----

From: Ethan Brodsky <ethan.brodsky@gmail.com>

Sent: Tuesday, December 1, 2020 5:21 PM

To: Evers, Tag <district13@cityofmadison.com>; All Alders <allalders@cityofmadison.com>

Cc: Stouder, Heather <HStouder@cityofmadison.com>

Subject: [URGENT] #60646: RE: New statement by Edgewood's sound consultant

This is regarding agenda item 4 tonight, file #60646, Edgewood High School's appeal of the Plan Commission's denial of their application for a conditional use permit to install stadium lights and begin nighttime use of their athletic field. Please ensure that it is put into the legislative record.

On December 1 at approximately 4 PM, a new document was posted into the Legistar file for this issue, titled "Rick Talaske's planned 1 December 2020 presentation regarding sound matters."

That document can be found here:

https://urldefense.proofpoint.com/v2/url?u=https-3A_edgewoodhs.ss13.sharpschool.com_UserFiles_Servers_Server-5F106488_File_Facilities_Edgewood-5FHigh-5FSchool-5FNoise-5FStudy-5F2019.pdf&d=DwIDCQ&c=byefhD2ZumMFFQYPZBagUCDuBiM9Q9twmxaBM0hCgII&r=2MtVRMew_bcHyGAP7ZqJik2RkvN6isg5tYWi4sfcfw0&m=OZRz5xdos8Q5gtpZUeSFoDJK5u5Sa3E-2AqWwTuh_d4&s=ED727IEEUjtcLRs3ZWFuuepLkn9YlpCQ_u4E11LuxyU&e=

This is written by the same acoustical consultant that was hired by Edgewood to perform the noise study that they entered into the legislative record in January 2019, a study which I pointed out at the time included numerous errors.

https://urldefense.proofpoint.com/v2/url?u=https-3A_madison.legistar.com_View.ashx-3FM-3DF-26ID-3D6968376-26GUID-3D293A6B63-2DC00B-2D4F1F-2DA2C7-2D98AA2137C2D3&d=DwIDCQ&c=byefhD2ZumMFFQYPZBagUCDuBiM9Q9twmxaBM0hCgII&r=2MtVRMew_bchYGAP7ZqJik2RkvN6isg5tYWi4sfcfw0&m=OZRz5xdos8Q5gtpZUeSFoDJK5u5Sa3E-2AqWwTuh_d4&s=InbmXlrnT3cKOKl-YlyiZs7QIHoc1fBHLZAIiSBQfw&e=

I have included my contemporaneous comments on this study at the end of this message.

Regarding the statement entered into the record today, I will note the following. Please forgive any errors, as the time constraints here have prevented me from subjecting this letter to my usual level of review.

* The document reports that "Measurements for two hours were performed at the three locations noted on Figure 1. * Ambient noise levels ranged from 50.6 to 63.2 dBA. * Peak sound levels ranged from 68.5 to 75.8 dBA". It does not identify the time of day at which these readings were taken. The January 2019 report identifies that as being "late afternoon hours" but does not specify the exact time of day. Presumably these readings were then taken during rush hour, as they are substantially higher than many measurements taken at other times. Also note that they shows differences of ~15 dB between locations in some bands, and Leqs varying over 12 dB, then "averages" these measurements together in what appears to be mathematically incorrect manner to come up with a single figure. The consequence of this is that the report dramatically overstates ambient

(background) sound levels in the neighborhood, claiming that they are far louder than they actually are. Every other study and report has put the typical ambient nighttime noise level in the neighborhood in the ~42-47 dB range.

* The document states that the results of their sound study showed "peak sound levels" ranging from 68.5 dB to 75.8 dB and "average" sound levels of "55dBA to 60 dBA during a football game". It then goes on to state that "The average sound level over a one-hour period will be less than 65 dBA, which we understand is the number referenced within the City of Madison noise ordinance." This shows an error in understanding the city's noise ordinance, which regulates PEAK LEVELS, not AVERAGE LEVELS. MGO 24.08 sets a limit of 65 dBA peak (slow response / 1 s filtering) at residential property lines. Thus this letter acknowledges that the proposal would generate sound levels that the city has deemed to be harmful. This is true even for events with as few as 150 attendees.

* The report disparages other measurements of noise by stating that "Noise measurements not made with calibrated precision sound level meters and taken without a wind screen should be assumed to be inaccurate. This is especially true with measurements made with iPhones, meters from Radio Shack, or similar uncalibrated equipment." Please note that another professional noise study was performed in Fall 2018 by Wise Associates, a well-regarded acoustical firm. They collected measurements were using a "HP 3569A Frequency Spectrum Analyzer and an ACO Pacific ANSI Type 1 microphone/pre-amp, with calibration certified by Scantek, Inc." This is high-end equipment and a far cry from "iPhones and Radio Shack Meters" that Mr. Talaske dismisses. Wise also reported ambient sound levels of 42 dB in the vicinity, based on measurements taken for projects they did for Edgewood College in the 2019-2015 period. I myself also took numerous measurements with an Extech 407736 meter, using a windscreen when wind was present (there is a photo of it in my presentation). While this meter did not receive regular calibrations, it has always shown consistent measurements against other meters that do.

* The report dismisses peak levels of 80 dBA as being not "significant". Peak sound levels of 80 dBA are indeed significant. The fact that they may be 20 dB quieter than an ambulance siren at 50 ft does not make them irrelevant. Who hasn't had to pause conversation as an ambulance passes their house?

* The figures on page 7-8, which Edgewood also uses in their presentation, show "Levels LrD in dB(A)". While LrD is not defined in their presentation or their earlier report, LrD is generally a symbol used to represent the "Yearly averaged daytime sound level", typically used in traffic studies. This is an average level, not a peak level, so their finding that the stadium may cause levels exceeding 60 dB at neighboring homes is not a vindication that the stadium's noise impact will be minimal, but actually a finding that the stadium's noise impact will be substantial, raising the noise in the area around the stadium enormously over the 40-45 dB ambient level that they themselves show in their figures. That's right, they acknowledge the 40-45 dB ambient sound levels themselves in the figure. Their own full report, submitted by Edgewood into the legislative record in January 2019, shows that the peak levels a stadium would cause at these homes would exceed 75 dB. That's far far louder than the 65 dB limit in the ordinance. Even for crowds as small as 150 spectators, they would exceed 65 dB.

The Conditional Use Standards for Approval require that

"The uses, values and enjoyment of other property in the neighborhood for purposes already established will not be substantially impaired or diminished in any foreseeable manner."

by a development and that the application demonstrate this with substantial evidence.

Furthermore, MGO 28J Supplemental Regulations state, in MGO 28.151

"Supplemental regulations are established to address the unique characteristics of certain land uses. The standards and conditions listed for land uses in this chapter are applicable to both permitted uses and uses permitted by conditional use permit, as specified for each zoning district, unless otherwise noted."

...

"Outdoor Recreation .

...

(c) The site shall be designed in such a way as to minimize the effects of lighting and noise on surrounding properties. Hours of operation may be restricted and noise and lighting limits imposed as part of the conditional use approval."

It is clear that this proposed development fails to meet this standard.

The information presented here does not change that.

The denial should stand.

Thank you,

Ethan Brodsky

===== I attach below my original comments on Edgewood's noise study, as submitted in January 2019. =====

Date: Wed, 9 Jan 2019 15:02:16 -0600 (CST)

From: Ethan Brodsky <ethan.brodsky@gmail.com>

To: Heather Stouder <HStouder@cityofmadison.com>,

Timothy Parks <TParks@cityofmadison.com>,

Matt Tucker <MTucker@cityofmadison.com>

Subject: Rebuttal to Edgewood Jan 4 noise study

Message-ID: <alpine.DEB.2.20.1901091424570.1464254@tux-69.cae.wisc.edu>

User-Agent: Alpine 2.20 (DEB 67 2015-01-07)

MIME-Version: 1.0

Content-Type: text/plain; format=flowed; charset=US-ASCII

Ms. Stouder, Mr. Parks, Mr. Tucker -

Yesterday, I was informed of the existence of a document titled "AMBIENT NOISE MEASUREMENTS AND GRANDSTAND NOISE SIMULATION MODEL for EDGEWOOD HIGH SCHOOL GOODMAN ATHLETIC COMPLEX Madison, Wisconsin prepared by TALASKE and TLC Engineering for Professional Audio Designs, Inc. Wauwatosa, WI Issue Date: January 4, 2019". My understanding is that this document was

submitted to the city to support their application for an amendment to their Campus/Institutional Master Plan, and it is just now being circulated among the neighborhood.

Unfortunately, this document contains a number of technical and legal errors, omissions, and misstatements, which invalidate much of its analysis and conclusions. I will try to detail them here, but due to the highly accelerated time frame that we must deal with, I am only able to briefly summarize my concerns, and must apologize for any errors in my analysis, as I did not have time to subject it to my usual level of review.

The most significant issue is in Section III, "Review of Madison Noise Ordinance", in which the authors cite an obsolete version of the city's noise ordinance, which references limits of 70 dBA at night and 75 dBA during the day. This language appears to be from a version of MGO 24.08 that was passed in September 1974 and is inconsistent with the current ordinance, which imposes a limit of 65 dBA at all times. As many other portions of their analysis were based around demonstrating that noise levels would be under 70-75 dBA, this is a major error that invalidates almost all of their claims of compliance.

To further exacerbate this issue, the authors state in Section V that "the averaging method is not clearly identified within the Noise Ordinance". While this may have been true for the 1974 ordinance, the current regulations specify "fast meter response" for impulsive noises and "slow meter response" for all other noises. These response times are defined by ANSI standard to be 0.125 s and 1.0 second, respectively. Their noise study instead uses a one-hour average and concludes that "The average exposure of residents (LAeq 1-Hour Average) to noise from a typical football game event at the stadium is less than the stated maximum 70 dBA level within the Madison Noise Ordinance". This is wrong on so many levels - not only did they use the wrong limit and the wrong averaging period, but many of the assumptions and calculations that led to that estimate are absent. When noise levels are measured according to the city's standard for regulation instead of by this standard of their own invention, the numbers will be far higher than reported here and far in excess of the city's standard.

The next major issue is in their noise maps at the end of the document. The right figure for each is labeled "LAm_{ax} (Peak)", which is presumably the units with which the numbers labeling the isolines should be interpreted. Unfortunately, this is a self-contradictory unit and demonstrates a lack of understanding among the authors of how noise measurements are defined. LAm_{ax} is defined to be the highest value shown by a noise meter with a specific response function over a period of time. Typically it would instead be written LAF_{max} or LAS_{max}, or L_{max}_A,F, to make it clear what response function was being used. This report not only omits that (is it 0.125 s, 1.0 s, or something else?), but then writes

"(Peak)" afterwards, which introduces confusion as to whether they are actually reporting LAmax ("Maximum Sound Level") or Lpk ("Peak Sound Pressure Level"), which is an instantaneous measurement that is only weakly related to LAFmax, and only relevant in regulating extremely loud impulsive sounds to prevent hearing damage. As these maps are the critical result for determining the area over which stadium noise would exceed city regulations (the one-hour average maps on the left are irrelevant to that), it is essential that we understand what exactly they are showing.

Assuming the maps on the right actually are showing a slow or fast-weighted maximum dBA figure, they demonstrate the implausibility of the model the authors have used to estimate stadium noise. We can see this because Case 101 shows a simulation with "no wall, 150 spectators, 22 players on field, 1 referee's whistle, 2 R2-94 loudspeakers, and 28 pep band musicians", at a point 1.5 m above terrain. It shows a 70 dBA contour running along front-line homes on Monroe Street. On October 11, I took measurements using a noise meter, from the steps of a home at 2310 Monroe Street, at a point roughly that height above ground level, for a JV game at which there were approximately 50 spectators in the stands, the standard number of players on the field, and no band or PA system. During a short period of data collection, I observed a sound level of 68.6 dBA, using fast response time but no peak hold functionality (so the true maximum was likely higher). Tripling the crowd from 50 to 150 would increase this 4.8 dB to 73.4 dB, and there is no question that a band and PA system operating simultaneously would add more than an additional 1.6 dB, pushing this contour over 75 dBA. Measurements of the band alone at Waunakee from distances comparable to homes on Woodrow and Monroe yielded levels of 82 dBA for fast response and 78 dBA for slow response. Even a smaller band would likely be comparable or louder than crowd noise, and the PA system would necessarily need to be louder than the crowd for the crowd to hear it, so realistically we are talking about a 3-6 dB increase in levels, which puts the levels from an event of this size up closer to 80 dBA. It is clear that Edgewood's consultant is underestimating sound levels in this map by at least 5 dBA, and possibly more.

In addition to the lack of correspondence between their computer-modeled results and actual real-world measurements taken by multiple engineers, their model is suspect because it fails to identify many of the assumptions that went into building it. Spectator noise was merely described as "Each human noise source in the model is based on measured laboratory data for spectral content and directivity of people shouting", with no quantitative metric defining "how loud" those people were "shouting" or reference to the literature or experimental procedure that they used to come up with that number. The same is true for the band - there are no numbers, methodology, or reference to the literature that they may have used to pick out those numbers. For the PA system, they don't even define how the "volume knob" would be set, or what the "estimated amount of time per hour" that they used (not that that is relevant to whether the city's noise ordinance is

exceeded, as that is based on a one-second response time, not a one-hour response time).

If they want this sort of model to be taken seriously, they should use it to simulate noise from existing stadiums, then compare their predictions to actual measurements taken at those stadiums under the same conditions - if they can show correspondence between simulation and reality over a range of the parameter space, then there is validity in trusting their model to accurately predict what would happen should their stadium be built. Absent such evidence of accuracy, the results of the model cannot be trusted.

However, all flaws in their model aside, it is useful to note that Edgewood's consultant has acknowledged, through this report, that not only would a stadium would generate sound levels on neighboring properties that would exceed the city's legal limits, but that that would happen even with a crowd as small as 150 people. Any home within the purple "65-70 dB" contour on the right map in #101 would be so affected. In their 1000-spectator/no-wall scenario in #103, this contour is shown to extend out past Terry Place and West Lawn Avenue. This is an important acknowledgement on their part.

In Section II, the authors discuss measurements of ambient noise levels in the neighborhood, and carefully identify the equipment they used, sampling points, noise levels, and dates, but fail to mention what time the data was collected except to say that it was "late afternoon". Presumably "late afternoon" means "rush hour", since the 51-63 dBA levels they report are far higher than the 42 dBA that others have measured. While a rush-hour ambient baseline would be appropriate for discussing games conducted at rush hour, the loudest games that Edgewood is proposing would start at 7 PM and last until nearly 10 PM, so it is extremely misleading to use rush-hour sound levels as an ambient baseline for these events. In any case, even the exaggerated ambient baseline claimed in their report do not come close to "equaling or exceeding" the levels Edgewood is proposing to generate with their stadium.

In Section V, their observation that noise levels will be below OSHA limits to prevent hearing damage, and "not threatening to the general public" are appreciated, but not relevant, as nobody has been arguing that that is the case - this debate is over a stadium proposed in a residential neighborhood, not a factory where we are trying to protect employee's hearing. We are arguing that the noise would be disruptive, irritating, illegal, and would interfere with the use and enjoyment of our homes, not that it would cause hearing damage. While the 5 dB drop for indoor noise levels with windows open is reasonable, the "30-plus decibels less" they predict with windows closed is enormously in excess of the 20 dB attenuation documented elsewhere. In any case, the city regulates outdoor noise levels on neighboring properties, not indoor levels, so they should

not be able to be issued a variance or exemption on the grounds that "neighbors will be able to tolerate the sound if they close their windows from September through May".

Finally, I would like to note that the concept of erecting a noise barrier is a very recent addition to their proposal, few details have been provided, and there has been little time to fully examine it, but a general rule of thumb for highway noise is that a high-mass noise barrier that blocks direct-line-of-sight to the source will achieve a ~5 dB reduction in the nearfield, and that each meter of additional height above that yields an additional 1.5 dB of attenuation.

Due to the short timeframe, I have not yet been able to fully analyze their site, but some quick modeling shows that, for a 5m tall grandstand (16.4 feet), a wall between 8-9 m (26.2-29.5 ft) would likely be required along Monroe Street to block the direct sound path between the grandstand and front-line homes and achieve a predicted 5 dB reduction, and that achieving a predicted 9.5 dB reduction would thus require an additional 3 m, for a height between 11-12 m (36.1-39.4 ft).

This is substantially higher than what they discuss in their noise report, and my initial renderings of this show it would be a visually enormous structure that is much more imposing than what is implied by Figures 5 and 7. This seems like a substantial alteration to their proposed amendment, and I would be very strongly opposed to letting "Final details on wall construction" be "addressed as part of the architectural review submittal", as Edgewood requests in their letter to Mr. Arntsen on Jan 7.

Noise barriers of this sort only reduce noise over a short distance, typically on the order of 200 feet, so this would only mitigate sound levels for front-line homes and do little or nothing to reduce noise levels that other homes in the neighborhood would be subjected to. Even supposing a 10 dB reduction in noise level from an adequately-sized noise barrier, stadium noise would still be substantially in excess of city regulations over a large area.

I realize that this is very short notice and that you have imminent deadlines of your own, but I hope you will consider this criticism before trusting the analysis and conclusions in their report.

Thank you for your consideration,

Ethan Brodsky