

# **WisDOT Project I.D. 1206-07-03, SPES-F NH 04 U.S. Highway 18/151 Verona Road/Beltline: City of Madison Comments**

Note: SECOND REVISION per Dunn’s Marsh Neighborhood Association (DMNA) comments of 12-8-10 and 12-11-10, and comments provided by Transit and Parking Commission, Pedestrian-Bicycle-Motor Vehicle Commission, Parks Commission and Long Range Transportation Planning Committee. It should be noted that the Allied-Dunn’s Marsh Neighborhood Association (ADMNA) concurs with the DMNA comments.

*Note:* The following comments ~~were initially have been~~ compiled by the City of Madison, Planning Division, City Engineering Division, Traffic Engineering Division, and Metro Transit.

## **Differences Between Verona Road DEIS (2004) and SDEIS (2010)**

The major difference between the 2004 and 2010 documents pertains to the staging of roadway improvements in the Verona Road/West Beltline corridor, and the impacts on neighborhoods in the Verona Road/West Beltline vicinity. The most significant difference between the SDEIS and the original DEIS is that WisDOT has now identified near-term construction projects – including the single-point interchange at the intersection of Verona Road and the West Beltline – that should forestall the need for Stage 3 improvements for 20 years or more after completion of the Stage 1 improvements. The current SDEIS includes the depressed freeway within the Stage 3 portion of the project. WisDOT has indicated that it will re-evaluate impacts and mitigation measures at that time. The WisDOT should work closely with the City of Madison in completing this evaluation at that time and should formally commit to this re-evaluation in the Final Environmental Impact Statement for the project.

A concern of the City of Madison regarding the Verona Road project (expressed in 2004, as part of the original DEIS) were the requirements of Executive Order 12898, which 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. At that time, WisDOT proposed the construction of a depressed freeway (with walls, fencing and 55 mile-per-hour traffic) as part of the first phase of construction. At that time, the original Draft EIS indicated that this portion of 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” (which include residential relocations, business relocations, neighborhood access changes, parkland changes, and increased psychological and physical isolation of neighborhoods separated by the freeway).

WisDOT is now proposing a staging of the preferred alternative to address current needs and to put off the need for the Stage 3 improvements. The SDEIS indicates on page ES-8 that property acquisitions, for example that are not needed until the full freeway conversion can remain so that existing businesses and residents not needed for stages 1 and 2 can remain and continue to serve the residing business or residence.

The Dunn’s Marsh Neighborhood Association and Allied-Dunn’s Marsh Neighborhood Association have expressed strong concerns about the proposed improvements in Stage 1, and subsequent stages. Concerns have also been expressed about the health impacts of living in close proximity to transportation corridors like Verona Road. The DMNA/ADMNA has asked for a re-evaluation of the roadway improvements and a consideration of all alternatives to address the transportation needs of the area, including means to bypass intercity traffic around the urban area (such as south and north reliever facilities). Facilities and services to improve mass transit – including park-and-ride lots, bus rapid transit/BRT facilities (including a BRT transit corridor or easement,

shared lanes, bus pullout areas, etc.) should also be evaluated. Express bus service and future passenger rail service should be components of the alternative approaches to be evaluated.

The City ~~acknowledges the appreciates the open and inclusive~~ process used to prepare the SDEIS and to respond to City of Madison concerns. The City of Madison also acknowledges the extensive ~~outreach~~ efforts made to engage the community during the development and evaluation of the alternatives, and the efforts that WisDOT has made toward minimizing and mitigating the negative impacts. At the same time, WisDOT should understand that the Verona Road SDEIS is a very complicated project that requires individuals to put out extraordinary effort to become highly informed (and be able to question and comment in a meaningful way). The DMNA/ADMNA has commented that, in some cases, the public participation process did not allow adequate time to comment, and the process used at the Public Hearing made some residents feel disrespected.

As has been indicated by WisDOT, prior to the implementation of the Stage 3 improvements, additional information will be developed as part of a future environmental evaluation process for the Stage 3 alternative. It is important that such potential impacts be carefully reviewed at that time, which could be 20 years or more after the completion of Stage 1 improvements. As noted above, the City of Madison is not making many specific, detailed recommendations on the Stage 3 improvements proposed at this time.

In the interim, the City of Madison would like to provide some comments on the Stage 3 alternative as information to help guide the future evaluation of Stage 3 improvements in future planning activities. These comments are provided on page 10, under the heading “Stage 3 Improvements in the SDEIS”. The City of Madison looks forward to working with WisDOT and fully participating in these future planning activities.

### **Street System**

*General Comments:* The City would like to point out that, although access to businesses and residences along Verona Road may become more circuitous (primarily due to the design of the new jug handle intersection and grade separations), the roadway design elements have numerous positive impacts as well. Traffic safety and traffic flow are greatly improved with the new design, and connectivity is improved between the east and west sides of Verona Road. Bicycle and pedestrian travel are also enhanced with the connectivity improvements provided in the roadway design.

At the same time, it should be noted that the jug handle design – which is needed to extend the life of the single-point interchange – causes some indirection and may make the crossing of Verona Road (to access businesses and the neighborhoods) less direct. In particular, the project’s final design process should address concerns about the design of the Atticus Way frontage road and the ability of pedestrians to cross the street (to access businesses). Issues to be addressed in the final design process should include sight lines, additional and faster automobile traffic in the area and the placement of pedestrian crosswalks.

1. Page ES-2 recognizes the need to enhance non-motorized transportation in the project’s Purpose and Need, which the City of Madison fully supports.
2. ~~2.~~Page ES-3, para. D, Neighborhood Connectivity (Transit/Non-motorized Travel). This paragraph includes a little about vehicular connectivity but nothing about either transit or non-motorized travel. The City of Madison strongly supports the need for connectivity among transit and non-motorized transportation modes, and urges WisDOT to integrate such connectivity into the final design of the project and include some mention of the improvements that are being included in this section.

## Pedestrian and Bicycle Connectivity

*General Comment:* Careful attention needs to be paid to the directness and safety of pedestrian facilities across Verona Road in the Verona Road/Beltline interchange area and the jug handle area including signal timing, pedestrian island design, and conflicts with motor vehicle movements. Proper bike lane design and placement needs special attention in the jug handle area as well. Wherever the plan shows a pedestrian crosswalk, if a staged crossing is anticipated for pedestrians, it is important that the median refuge island be sufficiently wide for pedestrian safety and comfort.

3. ES-5, Stage 1: WisDOT should work closely with the City of Madison during the final design process to ensure that pedestrian and bicycle access is safely accommodated in the area near the new jug handle underpass of Verona Road. There will be heavy vehicular traffic using the underpass and on the jug handle roads, since these facilities replace the left turns onto Verona Road. There needs to be (a) a separate, two-way bicycle path located in the jug handle underpass, (b) good, safe connections to the streets and sidewalks, and (c) well-designed on-street bike facilities to make this intersection workable – and to ensure safe access to Walgreen’s and other area businesses. Given the changes in access - which will preclude left turns from Verona Road/USH 151 to Summit - it will be important that guide and directional signage be developed, to help facilitate wayfinding for local streets and businesses located in the vicinity of (and adjacent to) Verona Road.
4. ES-5, Stage 2: WisDOT should work with the City of Madison and the City of Fitchburg, during the final design process, on the design of the bicycle facilities in the area of CTH PD and Verona Road. The existing bike path along Verona Road should be maintained south to CTH PD. The main route, however, should be rerouted to the rail corridor to the east of Verona Rd and a new crossing of CTH PD should be created. Maintain the underpass of Verona Road near Williamsburg Way. Consider connecting the frontage road cul-de-sac south of Williamsburg Way on the east side of Verona Road to the Cannonball Trail as a last resort, if the current Military Ridge crossing of CTH PD is not feasible. The connection between the Military Ridge Bicycle Trail and Cannonball Path across CTH PD should also be accommodated, not as an alternative to, but in addition to the path along Verona Road. The crossing of CTH PD, if at-grade, should have actuated signals. If the crossing is grade-separated, it should include connections to the bicycle lanes on CTH PD. The DMNA/ADMNA prefers grade-separated bicycle crossings of CTH PD/McKee Road for all trail crossings: Military Ridge, Cannonball, and the Badger State Trail (Southwest Commuter Path). The final design process should carefully evaluate grade-separated crossings, as well as a grade-separated bicycle/pedestrian crossing of Verona Road and its frontage roads (located at the Beltline interchange area). An additional grade-separated crossing of Verona Road south of CTH PD should also be considered to make a safer connection to the bike trails east of Verona Road. In addition, consider providing a direct bicycle connection from Nesbitt Road to the CTH PD intersection with Verona Road (in Stage 2).

## Carling Drive/Freeport Road Underpass Connection

5. ES-4 and Figure 2.5-18 for Stage 1: WisDOT should work closely with the City of Madison to carefully design the potential connection of Carling Drive and Allied Drive north to Freeport Road. The additional street crossing would provide for better east/west connectivity across Verona Road while maintaining adequate routing options for Metro Transit Buses. However, the new street crossing has a number of design challenges, including relocating the adjacent bike path, directing traffic toward streets with poor vertical geometry, and safety challenges for connecting to the Southwest Bicycle Path. This connection will result in additional points of conflict between motorists and bicyclists, which do not exist today. The City of Madison and WisDOT should work carefully to design the intersection in a manner that minimizes these impacts, but does not eclipse the benefits of improved connectivity that this street would provide to the neighborhood. The new Freeport Road street ~~erossing~~ connection has also encountered opposition from some of the neighborhoods in the area. The City of Madison looks forward to working with WisDOT during

the final design process to resolve these issues and provide the safest crossing opportunity possible in that area, for all modes of transportation. It is acknowledged that this crossing may be necessary during Stage 1 construction. The City looks forward to working with WisDOT and affected neighborhoods to evaluate the impacts of this temporary crossing, and determine whether or not the crossing should become permanent or be removed.

6. ES-4 and Figure 2.5-18 for Stage 1: The extension of Carling Drive to Allied Drive appears to remove the existing pedestrian connection from Carling Drive to the Raymond Road intersection, and it is essential that this connection be maintained. If WisDOT intends to have the proposed section of Carling Drive serve as the bike connection replacing the existing off road path, than it is essential that a sidewalk be constructed on the easterly side of Carling Drive to serve pedestrians. As an alternative, the existing bike path could be relocated. The City also urges WisDOT to also maintain the existing intra-block pedestrian connection from the bike path to Allied Drive.

#### Frontage Roads

7. The City of Madison supports the accommodation of bicycle lanes along all frontage roads.
8. The City of Madison recommends the selection of Option B, as the frontage road redesign alternative in the southeast quadrant of the Beltline/Verona Road intersection. This option does not re-route the frontage road to Britta Parkway. The City also supports to use of landscaping, vegetation, green space and architectural treatments, in order to mitigate the impacts of building relocations in the area.
9. With the elimination of the existing traffic signal at the intersection of USH 151 and Summit (except for providing a signal for inbound 151 at the Avalon Village right turn lane), three new signalized intersections are created (noted below). The City feels that it is important that the State operate and maintain these signals, and they not become a local expense.
  - Summit and the south frontage road;
  - Summit and Freeport Road; and,
  - Summit and the north frontage road.

#### Midvale/Beltline/single-point urban interchange (SPUI)/Seminole Highway area

10. The City of Madison prefers to have a direct sidewalk connection between the ramps under the SPUI, and urges WisDOT to consider this type of crossing option as part of the final design process. At this time, the Stage 1 exhibit shows some misdirection. As also noted under "Pedestrian and Bicycle Connectivity", WisDOT should (as part of the final design process) evaluate and strongly consider a grade-separated bicycle/pedestrian crossing of Verona Road and its frontage roads (located at the Beltline interchange area). Note: One option to be considered would be to construct an overpass of Verona Road north of the Beltline to function as a pedestrian crossing on the northern leg of the single point intersection. Connect the overpass on the west side to the mall and possibly to Hammersley Road. On the east side, connect the overpass to a sidewalk extending from Doncaster Drive through property vacated for the reconstruction. Doncaster could then be signed as a bike route to the Whenona Drive overpass of the Beltline. The idea would be to create a continuous ped/bike connection from the Hammersley connector of the Southwest Path to the Whenona Drive overpass of the Beltline. In addition, tighter curve radii should be considered at the SPUI, to help slow traffic (and improve pedestrian safety).

11. Detailed plans for lighting under the Beltline bridge need to be finalized and formalized, and the City looks forward to working with WisDOT and affected neighborhoods on the development of these plans.

12. A median opening is shown, between the SPUI and the intersection of Nakoma Road and Midvale Boulevard. The City would like to ensure that this median opening is intended to serve a remaining driveway to the Dorn Hardware site. It is important that traffic not queue back from the SPUI and create a multiple threat crash condition where northbound left-turn traffic crosses queued southbound vehicles and is struck by southbound right-turn traffic in the outside lane. In addition, there are currently two driveways to the Dorn Hardware/Strip mall from Hammersley Road. WisDOT should work with the City of Madison to clearly identify how these accesses will be affected, as part of the Stage 1 improvements.
13. The project's final design process needs to carefully consider the traffic operations along Midvale Boulevard. The City is particularly interested to review the operations at the intersection of Nakoma Road and Midvale Boulevard, given the anticipated increases in turning volumes (which may result from the closure of the Dorn Hardware driveway from the westbound Beltline on-ramp). In addition, given that Verona Road north of the SPUI is being widened, the potential impacts on the closely-spaced intersections of Nakoma Road/Midvale Boulevard and Nakoma Road/Doncaster Drive need to be fully understood, and mitigation measures identified. WisDOT should work closely with the City of Madison to conduct detailed traffic operations planning for that area.

### **Property Acquisitions**

*General Comment:* The proposed property acquisitions, although regrettable, appear necessary to accommodate the preferred alternative. The City acknowledges WisDOT's efforts with business and residential relocations and the development of mitigation measures.

### **Aesthetic Treatments, Landscaping and Green Space**

1. The City appreciates WisDOT's commitment to providing aesthetic treatments throughout the project area, including vegetation, green space and architectural treatments. Specifically, the Supplemental Final Environmental Impact Statement must commit to a high level of urban streetscape improvements along all reconstructed streets. All fencing must be of high aesthetic quality and adequately screened. Architectural/aesthetic/artistic treatments and textures should be applied to all concrete structures associated with bridges, crossings, noise barriers and all above ground structures. Entrance features and public art should be incorporated into the project, where appropriate. The City of Madison urges WisDOT to hire an architect, landscape architect, and to include a public artist on the project's final design team. In addition, WisDOT should consult with affected neighborhood associations, as part of this design process.
2. The City feels that it is important that WisDOT expand the green space between the frontage roads and the Beltline, and between the frontage roads and Verona Road (where possible). The City of Madison is hopeful that the additional property acquisition will make this possible. In addition, the City requests that WisDOT consider, in the southwest quadrant, measures to improve the aesthetics between the frontage road and Beltline - such as a narrow planter or specific architectural treatments. In general, terraces should provide for a minimum of 8 feet of grass between the sidewalk and the curb and gutter (and more is desirable). In addition to improving the overall appearance, these measures will provide adequate space for healthy trees and separation for pedestrians. The final design process should evaluate frontage road aesthetic design. In particular, the DMNA/ADMNA has stated that moving the frontage roads further into the neighborhood to expand green space between them and the Beltline should be accompanied – on the neighborhood side of the Beltline frontage road – by attractive vegetation, and berms or sound walls to block traffic noise. Native plants should be considered in the green spaces between the frontage roads and the Beltline, and the

frontage roads and Verona Road. Besides providing aesthetic enhancements (as demonstrated along the Southwest Path), native plants can help with stormwater infiltration.

3. In the SDEIS, WisDOT has indicated its intent to involve adjacent residents to a considerable degree in developing context sensitive features, aesthetic treatments, and landscaping during the design phase of the project. The City supports that commitment and looks forward to refining these important project elements as the final design process moves forward. Furthermore, the City proposes that a formal agreement between WisDOT and the City of Madison to ensure the integration of aesthetic treatments into the design of the roadway facility and the proper maintenance of aesthetic features and landscaped green space. The DMNA/ADMNA suggests that the City and WisDOT work with various neighborhood organizations together (at the same time) so as to minimize any differences or friction that could occur if separate meetings are held with the different entities.

### **Storm and Sanitary Sewer**

1. Page 4-159 shows proposed bio-retention basins in the jug-handle. Public sanitary sewer and water main reside in these areas, as well as possible other utilities.
2. Sanitary facilities on the frontage roads may need to be relocated, depending on which option is selected. At a minimum, the City of Madison will need to evaluate the condition of sewer mains to determine rehabilitation strategies prior to the interchange work being completed. There will be varying degrees of sewer work required, depending on the degree of improvements.
3. Page 4-160 discusses the potential for a wet detention basin in Dunn's Marsh. The document states that "Further coordination with officials from the City of Fitchburg and the WDNR is being pursued." The lands for the proposed wet detention basin are owned by the City of Madison Storm Water Utility, and as such coordination with the City of Madison will be necessary. The proposed pond shown in Figure K. 3-2 needs to be coordinated with the City of Madison (not the City of Fitchburg) as Madison are the owners of this piece of land.
4. The proposed wet detention basin in Dunn's Marsh will need to be designed such that it does not interfere with the conveyance channel that carries the runoff discharging from the west. The proposed basin will need maintenance access and an agreement with WisDOT (to maintain the facility, monitor water quality, and ensure that negative impacts on water quality are fully addressed). It should be noted that the DMNA (and Allied-Dunn's March Neighborhood Association) oppose a wet detention basin in Dunn's Marsh, as well as using wooded land for detention. Furthermore, the neighborhood associations request WisDOT to (as part of the final design process) evaluate and comment on the feasibility of storing water under the right-of-way – where it can percolate into the soil naturally. Such a plan would address issues of both quantity and quality of water entering Dunn's Marsh and the entire downstream waterway that flows into the UW Arboretum, and eventually lake Waubesa and beyond.
5. Page 4-161 shows a proposed bio-swale or bio-retention area north of the Beltline and adjacent to the bike path. This area has been prone to periodic flooding, including (less frequently) on the Beltline. The flooding should be reviewed and any design should improve the situation to the extent practical.

## **Traffic Management Planning: Project Construction**

1. The City of Madison urges WisDOT to implement traffic mitigation measures, in order to minimize the amount of traffic that cuts through neighborhoods (both during and after construction. Special attention should be given to the safe flow of traffic along Verona Road, Midvale Boulevard, Seminole Highway and Whitney Way. Specifically, a detailed traffic management and wayfinding plan should be prepared (for use during the construction project) - to help minimize neighborhood cut-through traffic on local streets, accommodate safe traffic flow, ensure safe and convenient access to area businesses and residents, ensure accessibility for ambulance and other public safety vehicles and access to local bus service. Traffic calming measures should be considered in select areas (on local streets) where cut-through traffic is a concern, and could be temporary (during construction) or permanent. WisDOT should consider hiring off-duty law enforcement personnel to provide speed limit enforcement on Whitney Way and Seminole Highway. In addition, WisDOT should evaluate a traffic signal at Sentinel Pass and Seminole Highway, in order to create traffic gaps (for neighborhood traffic access).

## **Air Quality and Noise Mitigation**

1. The document notes that sound walls are a noise mitigation option at several locations. The City would like to confirm that if these sound walls are included in the Final EIS that they will be built. If there is some additional process which is needed to decide if sound walls should be built in these areas WisDOT should work with the City of Madison and State of Wisconsin to identify and carryout this process. WisDOT should also work with the City to identify alternatives for the future use of the Highlander Motel – recognizing that, if the Highlander remains, it will eliminate the potential for sound walls in that area of the southeast quadrant of the Beltline/Verona Road intersection. Both Madison and Fitchburg residents (and the neighborhood associations) desire more sound mitigation than the SDEIS contemplates during Stage 1 and Stage 2 construction. Creative efforts to provide sound mitigation should be pursued by WisDOT in conjunction with the neighborhoods and local governments.
2. The City of Madison urges WisDOT to monitor air quality in adjacent neighborhoods, which should include regular reporting and possibly a monitoring station. The DMNA/ADMNA request that baseline monitoring of air quality be conducted at this time, as well as during and after construction (with regular reporting to the neighborhood).
3. WisDOT should work with the City of Madison to support the weatherization of homes in the area, to help reduce the impacts of noise and air pollution. WisDOT should work with the City of Madison to support the facilitate the use of grants to low-income homeowners, information sharing, and other mechanisms.
4. WisDOT is urged to support the City of Madison and ~~(A)DMNA~~ DMNA/ADMNA, to help secure a grant for Health Impact Assessment for the Verona Road project, and work to implement recommendations.

## **Transit System**

1. ES-15 (Efforts to Minimize and Mitigate Impacts j. Installing bike lanes and sidewalks on all frontage road and neighborhood roads being constructed in Stages 1): The City of Madison would like to ensure that all frontage roads have sidewalk connections to all bus stops, which may result in additional sidewalks at various locations throughout the study area. At a minimum, where continuous sidewalk is not provided, sufficient right of way should be available on both sides of the roadway at intersections and other pedestrian

access points to allow for concrete boarding surfaces and a curb ramp/crosswalk connection from one side of the street to the other.

2. 2-1: Include some mention of the creation of the Regional Transit Authority under the list of coordinating agencies, alternatives and broad transportation strategies.
3. 2-17, Figure 2.5-12: The complete street network north of McKee Road opposite Nesbitt Road is not shown (Kapec Road extends north and intersects Williamsburg and Anton). Kapec Road is incorrectly shown as a dead-end roadway, and Williamsburg/Anton is shown as a T-intersection.
4. 4-78 (B.2 Existing Transportation Modes and Traffic)
  - Note that, effective May 24 of 2009, five distinct route numbers operated within the Beltline/Verona Road area.
  - Route 18 operates all day long seven days a week (530a-1200a weekdays, 630a-1100p weekends).
  - Route 19 operates all day long on weekdays (530a-1130p); Route 55 operates during weekday peak hours only (630a-930a and 430p-730p); Route 56 operates during weekday peak hours only (530a-930a and 330p-630p); Route 59 operates weekends only (700a-1100p)
5. 4-79 & 4-80, Figures B.2-3 & B.2-5: There is an inaccurate portrayal of Routes 18 using the Midvale-Beltline pattern and Route 56.
6. 4-87, Figure B.4.2-6: Metro Transit notes the existing bus stop zone on the east side of Midvale Boulevard, north of the signalized intersection at Hammersley/Nakoma, would appear to occupy the through traffic lane due to expansion of the intersection. This bus stop zone is presently out of the traffic flow of the two adjacent travel lanes and serves as a time stop where buses await their scheduled departure time. The City recommends that this bus stop zone be maintained as distinct from the through travel lanes to avoid conflicts between the parked bus and through traffic.

### **Stage 3 Project Improvements in the SDEIS**

#### **Property Acquisitions**

1. The Supplemental Final Environmental Impact Statement should recognize and acknowledge the negative impact on market values and the depreciation of properties and structures scheduled for acquisition and demolition/relocation as part of the Stage 3 improvements. Furthermore, the City of Madison proposes - as a component of the property acquisitions for the project – that a “real estate/corridor management plan” process be developed, and a formal agreement be entered into with WisDOT. This is necessary to ensure that, certain properties do not fall into disrepair and create additional problems in this sensitive neighborhood. The real estate/corridor management plan should also allow for WisDOT to acquire (and potentially demolish) certain properties early in the project development process.

#### **Stage 3 Bicycle Facilities**

1. ES-7 Stage 3: Figure ES 3-4 should show the existing Badger State Trail, that extends south from the Southwest Path at the Capital City Trail, as this facility is a major bicycle path that extends to the State of Illinois.
2. In the Stage 3 design, there is an option to bring the Southwest Bicycle Path up to Raymond Road and cross 151 on the Raymond Road bridge. The City recommends maintaining the grade separation for bikes [using a](#)



facility that travels up and over Verona Road). This will help minimize and minimizing the conflicts that are inherent when cycle paths cross arterials at-grade.

3. In the Stage 3 design, there is an option to bring the Southwest Bicycle Path up and over the depressed freeway. Given the significant vertical height of this bridge, it is important that it be designed and treated carefully – in order to reduce cyclist and pedestrian discomfort.

### Stage 3 Traffic Circulation

4. WisDOT proposes to eliminate the on- and off-ramps from the Beltline to Seminole Highway, as part of Stage 3 improvements. It is important that redirected traffic be considered in the operation of the signals at Midvale Boulevard and Nakoma Road, and Todd Drive and the frontage roads. The elimination of the ramps should be re-evaluated as part of the Stage 3 planning process. The DMNA/ADMNA has stated that closing the off-ramp to Seminole Highway would be a severe hardship to the Dunn's Marsh neighborhood, and closing the on-ramp to the Beltline (just east of Seminole) would cause congestion at Todd Drive.

### Stage 3 Transit

5. (ES-13, 2. Bicycle/Pedestrian Impacts, Stage 3): WisDOT should carefully re-evaluate pedestrian and bicycle access to transit routes under the one-way pair scenario. Southbound buses between Summit Road and McKee Road would only be able to serve stop locations along the western frontage road, inaccessible to those east of the depressed freeway - except at the widely spaced roadway crossings of Summit, Raymond and Williamsburg.
6. (2-18, Figure 2.5-13): WisDOT should re-evaluate Stage 3 traffic circulation in the Summit intersection area, as part of the Stage 3 planning activities. There could be a possible alternative for westbound traffic on the south frontage road, approaching the Summit intersection from Seminole Highway: Rather than have this westbound traffic (wanting to head south along Summit/Atticus towards Allied) needing to twice cross the one-way northbound traffic flow (first prior to reaching Summit intersection, then again turning left onto Summit/Atticus towards Allied) - instead route this frontage road from Seminole directly into the Summit/Atticus area. This concept would create a T-intersection of Summit at Atticus and the realigned Frontage Road - similar to the geometry on the opposite side of Verona Road by Home Depot. However, the DMNA/ADMNA is opposed to any new thoroughfare through the neighborhood (from Seminole Highway to the Summit intersection).
7. (4-50 & 4-51; 4.6.3.1 Indirect Effect-Evaluation Methodology and Results): The City of Madison would characterize the impacts for Stage 3 as a "moderate impact" to "Transit" for (Table 4.6.3.1), as opposed to "low impact". Metro anticipates greater impacts under Stage 3 with the simultaneous elimination of both access to the Chalet Gardens neighborhood from the west (closure of median break at Verona Road) and the Dunn's Marsh neighborhood from the east (closure of Seminole Highway ramps). In general, the elimination of the ramps at Seminole Highway – including impacts to bus routing and traffic circulation - should be re-evaluated as part of the Stage 3 planning activities.
8. (C. Preferred Alternative Stage 3; d. Physical Isolation of Allied and Dunn's Marsh Neighborhoods): WisDOT should evaluate the isolation of the Chalet Gardens neighborhood, generally between Allied Drive and Verona Road, as part of the Stage 3 planning activities. Only limited access would be available from the west (via the northbound one-way frontage road), leaving the only full access from the east via Lovell, Allied and Atticus.
9. (4-97; B.5.3 Stage 3): The City of Madison notes that Stage 3 (regardless of potential route network changes between now and 2030) would significantly impact access from the west into Chalet Gardens neighborhood,

as well as pedestrian connectivity to southbound buses - that would be on the opposite side of the depressed freeway between Summit and McKee Road on the one-way frontage road heading that direction. In addition, the possible routing pattern portrayed in Figure B.5.3-1 would increase the average travel distance of the current Route 18 pattern from roughly 7.4 miles to 9.3 miles - implying an infeasible 22 mph average speed over the current 26 minute cycle time between the transfer point locations. Not noted are potential changes on Nakoma at Mohawk just east of the Midvale intersection (identified 4-117, 2. Northeast Quadrant). Metro Transit also currently accesses eastbound Mohawk Road by this service station via southbound Nakoma and making the left turn onto Mohawk just prior to Midvale.

10. Extending Raymond Road into the Allied Neighborhood in Stage 3 would work to address concerns about the isolation of the neighborhood while maintaining routing options for Metro Transit buses. The DMNA/ADMNA opinion is mixed about extending Raymond Road across Verona Road.

### Parks Division and Parks Commission Comments

As the SDEIS states, under Stage 1 of the project, the frontage road along the southeast quadrant of the interchange will be relocated. Option A appears to have minor impacts to Britta Park; Option B would allow Britta Park to remain untouched, so it is the preferred option from a parks perspective. If WisDOT's Frontage Road Option B is selected and the buildings abutting the existing frontage road between Whenona Drive and Niemann Place that currently provide noise and visual screening for Britta Park are removed, it is also recommended that a noise wall between the new frontage road and Britta Park be constructed to reestablish the existing screening. If this is not statutorily possible, it is recommended that a visual barrier be created (potentially earth mound and plantings).

According to WisDOT, Stage 3 of this project will be constructed when operation and safety needs warrant the infrastructure investment; it is anticipated that this will occur near the year 2030. It is recommended that the need for Stage 3 of this project, which would potentially require WisDOT to acquire more than ½ of Britta Park, be reevaluated before its implementation. The loss of any parkland is detrimental to the health and well-being of the citizens of the City of Madison, particularly in this area of the City where there is a lack of neighborhood park facilities. Both Britta Park and DeVolis Park help to fill that gap. At the April meeting where the three options for Stage 3 were presented, Park Commissioners felt that while they would prefer there would be no loss of parkland, the other alternatives identified (rerouting the frontage road on Britta Drive (essentially cutting off the park from the neighborhood), or discontinuing the frontage road which would require traffic to route through the neighborhood) could not be supported.

Mitigation recommendations include, in addition to paying fair market value for parkland and seeking replacement parkland opportunities, adding recreational facilities to DeVolis Park. These will be based on community input and subject to Park Commission approval. These may include, but are not limited to playground equipment and sport court (basketball and volleyball, etc.) facilities. More details regarding these improvements will be provided after community input has been obtained and evaluated, which would occur closer to the implementation of Stage 3 given the projected timing for this stage.

These recommendations are subject to Park Commission approval, both now as well as in the future.