

# Determination of No Adverse Effects Madison East-West BRT

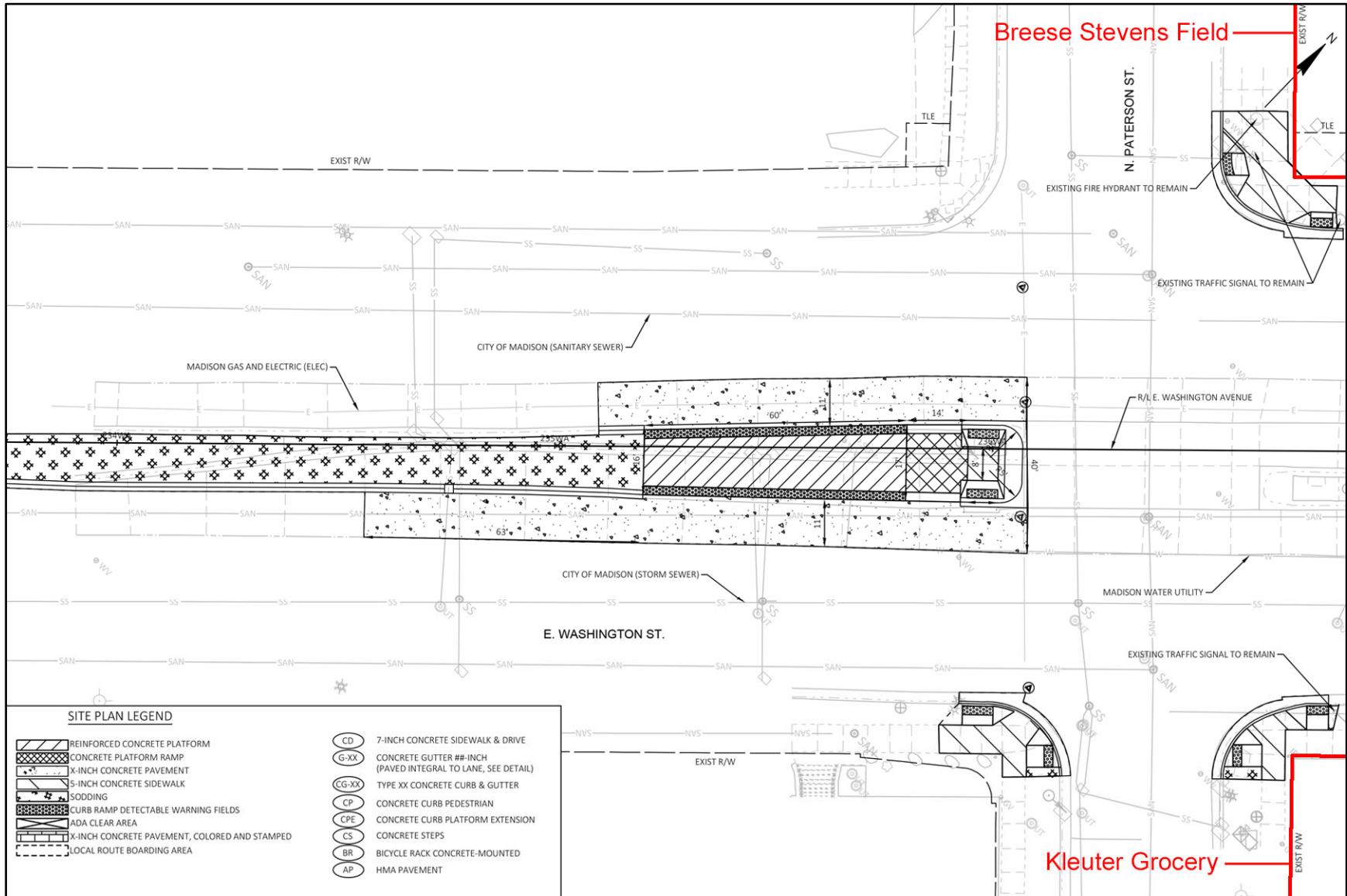


Figure 36. E. Washington Avenue at Paterson Street – Plan View of Proposed Median Station  
In Vicinity of Breese Stevens Field and Kleuter Wholesale Grocery Warehouse

# Determination of No Adverse Effects Madison East-West BRT

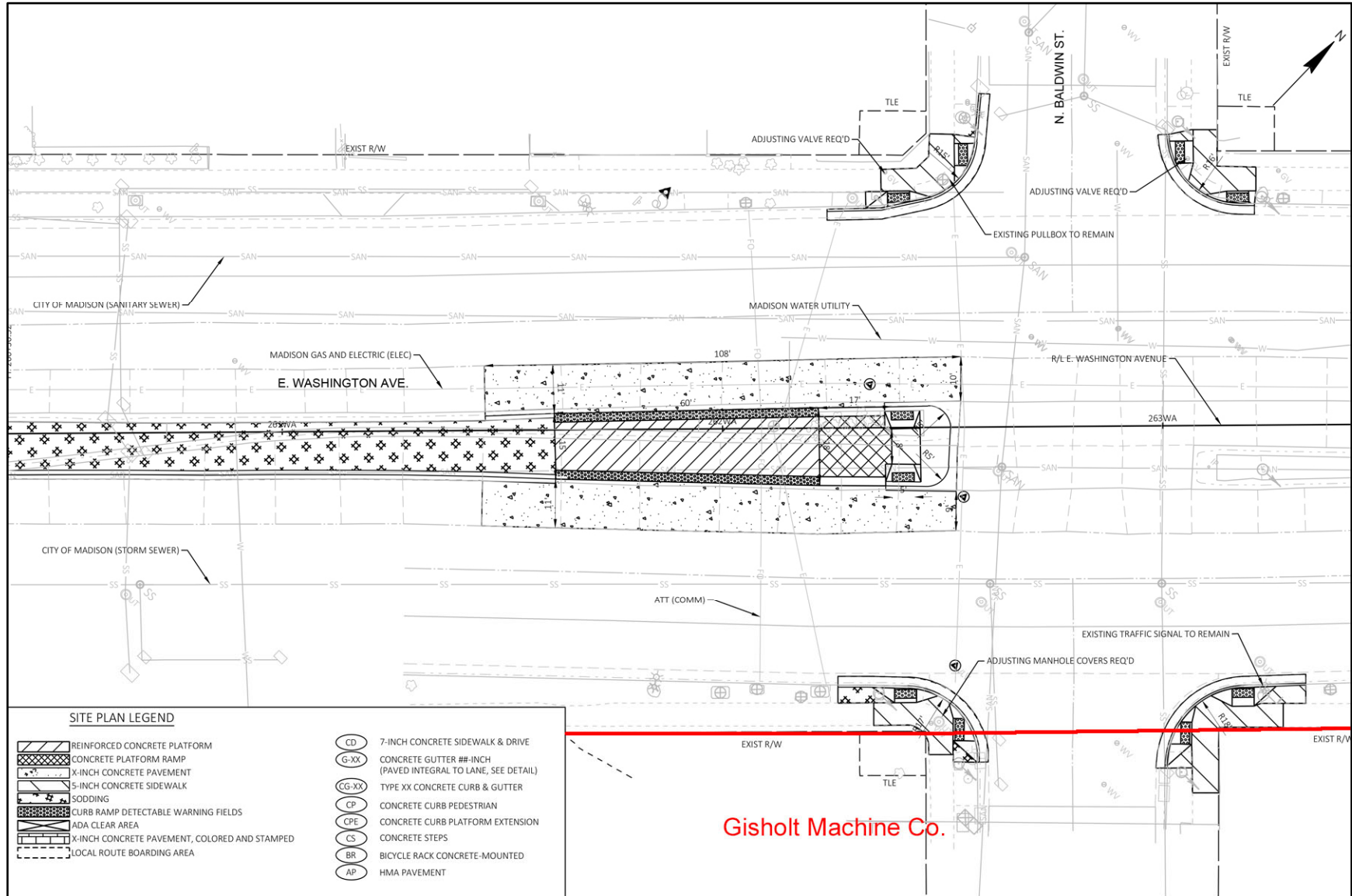


Figure 37. E. Washington Avenue at Baldwin Street – Plan View of Proposed Median Station  
In Vicinity of Gisholt Machine Company

Determination of No Adverse Effects  
Madison East-West BRT



Figure 38. E. Washington Avenue at Baldwin Street, View South – Existing  
*Gisholt Machine Company in Background*

Determination of No Adverse Effects  
Madison East-West BRT



Figure 39. E. Washington Avenue at Baldwin Street, View South – Proposed Median Station  
*Gisholt Machine Company in Background*



**Determination of No Adverse Effects  
Madison East-West BRT**



Figure 41. E. Washington Avenue at 4<sup>th</sup> Street, View North – Existing  
*Madison East High School in Background*

**Determination of No Adverse Effects  
Madison East-West BRT**

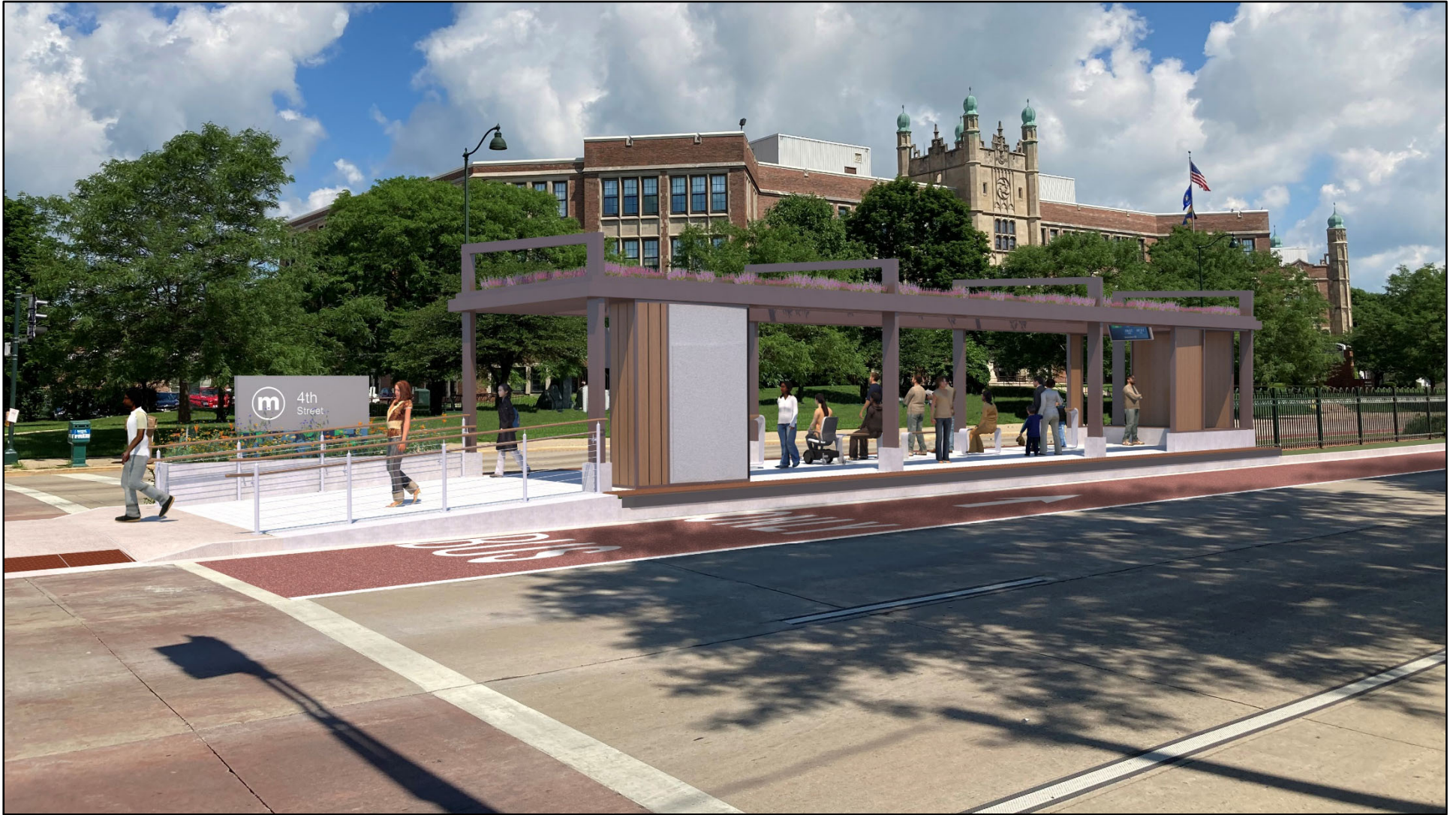


Figure 42. E. Washington Avenue at 4<sup>th</sup> Street, View North – Proposed Median Station  
*Madison East High School in Background*

**Determination of No Adverse Effects  
Madison East-West BRT Project**

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**APPENDIX B**

**Consulting Party Meeting Summaries**

**Consulting Party Comments and Responses**

**Landmarks Commission Staff Reports**





U.S. Department  
of Transportation  
**Federal Transit  
Administration**

REGION V  
Illinois, Indiana,  
Michigan, Minnesota,  
Ohio, Wisconsin

200 West Adams Street  
Suite 320  
Chicago, IL 60606-5253  
312-353-2789  
312-886-0351 (fax)

May 6, 2021

[Name]

[Title]

[Company/Organization]

[Address]

[City, State, Zip]

RE: Section 106 Consulting Party Invitation – Madison East-West Bus Rapid Transit (BRT) Project,  
Madison, WI

Dear [Name of Recipient]:

The Federal Transit Administration (FTA) in cooperation with the City of Madison (the city) is proposing the Madison East-West Bus Rapid Transit (BRT) Project in Madison, WI. FTA and the city will be preparing a documented Categorical Exclusion pursuant to 23 CFR 771.118 (c)(9) to evaluate the environmental impacts of the project. As part of its responsibilities under 36 CFR § 800 – Protection of Historic Properties and the National Historic Preservation Act (NHPA), FTA is initiating a Section 106 Consultation Process for the Project.

The Project's locally preferred alternative (LPA), as adopted in January 2021, is an approximately 15-mile east-west BRT route that will run along E. Washington Avenue, around Capitol Square, through the University of Wisconsin-Madison campus, and along University Avenue and Mineral Point Road to Junction Rd. It will be an on-street system with buses operating in a combination of mixed traffic and both center running and side running bus lanes, with running way improvements such as limited stops, transit signal priority, and other various intersection improvements. The BRT route will have a total of between 30 and 32 station locations and terminate to the east near the intersection of E. Washington Avenue and East Springs Boulevard and to the west off Mineral Point Road near the Madison Beltline. A map of the LPA is included with this letter and additional information about the project can be found at: [www.cityofmadison.com/metro/routes-schedules/bus-rapid-transit](http://www.cityofmadison.com/metro/routes-schedules/bus-rapid-transit). Additional enclosures include area of potential effects (APE) memos for architecture-history and archaeology resources.

Section 106 of the *National Historic Preservation Act* requires federal agencies to take into account the effects of their undertakings on historic properties. This process involves efforts to identify historic properties potentially affected by the undertaking, assess its effects, and seek ways to avoid, minimize or mitigate any adverse effects on historic properties. In accordance with 36 CFR § 800.2(c), you are invited to participate in the Section 106 process as a Consulting Party. As part of the process, the project team will work through a three-step process with consulting parties to:

**Consulting Party Invitation Letter - May 2021**  
*Section 106 Consulting Party Invitation*  
*Madison East-West BRT Project, Madison, WI*

1. Identify historic properties that could be potentially affected by the project;
2. Assess project effects on these resources; and
3. If there are adverse effects, develop ways to avoid, minimize, or mitigate adverse effects on historic properties.

Participation in this process is voluntary and open to anyone “with a demonstrated interest in the effect of the undertaking on properties listed on or eligible for listing on the National Register of Historic Places.” This may include property owners, business owners, historic preservation groups, neighborhood associations, or others who are interested in historic resources and preservation. Additional information about the consultation process is available online at <http://www.achp.gov/citizensguide.html>.

Your timely response to this invitation will greatly help us incorporate your concerns into project development. For that purpose, we respectfully request that you complete the enclosed Project Consultation Options Form and forward it to FTA within 30 days of receipt of this letter. If you have questions or comments related to the proposed project, please contact Elizabeth Breiseth of the FTA Regional Office at the address above, by telephone at 312-353-4315 or by email at [elizabeth.breiseth@dot.gov](mailto:elizabeth.breiseth@dot.gov).

Sincerely,

**JASON M  
CIAVARELLA**

Digitally signed by JASON M  
CIAVARELLA  
Date: 2021.05.07 07:34:09 -05'00'

Jay Ciavarella  
Director, Office of Planning and Program Development

ecc: Elizabeth Breiseth, FTA  
William Wheeler, FTA  
Justin Stuehrenberg, City of Madison

Enclosures: Section 106 Consulting Parties Form  
LPA Map  
Madison BRT Archaeology APE Memo  
Madison BRT Architecture-History APE Memo

**Project Consultation Options Form**

City of Madison, Historic Preservation Planning

**Project:** Madison East-West BRT Project, Madison, WI

**For each project, please check the appropriate response. Use the back of this form or additional sheets if you wish to make comments:**

<b>Project</b>	Our organization is interested in participating in this project as a consulting party. <b>Further consultation is requested.</b>	Our organization has no interest associated with this proposed project and <b>further consultation is not required.</b>
Madison East-West BRT Project	<input type="checkbox"/>	<input type="checkbox"/>

**If you have chosen to continue consultation, please indicate the manner in which you wish to do so:**

Mail (Address):

Phone:

Fax:

e-mail:

Other: (please describe)

City of Madison, Historic Preservation Planning designated contact for this proposed project:

\_\_\_\_\_ Phone: \_\_\_\_\_

NAME, TITLE (Please print)

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

**Please respond within 30 days of the date of the letter.**

**Please return Via Email by scanning to:** [elizabeth.breiseth@dot.gov](mailto:elizabeth.breiseth@dot.gov)

**Via Fax to:** 312-886-0351 **Attention:** Elizabeth Breiseth

**Via Mail to:**

Elizabeth Breiseth, Federal Transit Administration, Region V  
200 West Adams Street, Suite 320  
Chicago, IL 60606-5253

## Consulting Party Invitation Letter - Contact List

Native American Tribe	Contact Name	Address 1	Address 2	City	State	Zip	Email Address
Bad River Band of Lake Superior Chippewa Indians of Wisconsin	Edith Leoso, THPO	PO Box 39		Odanah	WI	54861	<a href="mailto:thpo@badriver-nsn.gov">thpo@badriver-nsn.gov</a>
Forest County Potawatomi Community of Wisconsin	Michael LaRonge, THPO	8130 Mish ko Swen Drive	PO Box 340	Crandon	WI	54520	<a href="mailto:michael.laronge@fcpotawatomi-nsn.gov">michael.laronge@fcpotawatomi-nsn.gov</a>
Ho-Chunk Nation	William Quackenbush, THPO	PO Box 667		Black River Falls	WI	54615	<a href="mailto:bill.quackenbush@ho-chunk.com">bill.quackenbush@ho-chunk.com</a>
Lac Vieux Desert Band of Lake Superior Chippewa Indians	Daisy McGeshick, THPO	PO Box 249		Watersmeet	MI	49969	<a href="mailto:daisy.mcgeshick@lvd-nsn.gov">daisy.mcgeshick@lvd-nsn.gov</a>
Prairie Band Potawatomi Nation	Hattie Mitchell, THPO	16281 Q Road		Mayetta	KS	66509	<a href="mailto:hattiemitchell@pbpnation.org">hattiemitchell@pbpnation.org</a>
Prairie Island Indian Community Minnesota Mdewakanton Sioux	Noah White, THPO	5636 Sturgeon Lake Road		Welch	MN	55089	<a href="mailto:noah.white@piic.org">noah.white@piic.org</a>
Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin	Marvin Defoe, THPO	88455 Pike Road		Bayfield	WI	54814	<a href="mailto:marvin.defoe@redcliff-nsn.gov">marvin.defoe@redcliff-nsn.gov</a>
Sac and Fox Nation of Missouri in Kansas and Nebraska	Gary Bahr, Vice Chairperson	305 N. Main Street		Reserve	KS	66434	<a href="mailto:gary.bahr@sacandfoxks.com">gary.bahr@sacandfoxks.com</a>
Sac and Fox Nation of Oklahoma	Chris Boyd, Historic Preservation Officer	920883 S Hwy 99 Bldg A		Stroud	OK	74079	<a href="mailto:chris_boyd@sacandfoxnation-nsn.gov">chris_boyd@sacandfoxnation-nsn.gov</a>
Sac and Fox of the Mississippi in Iowa	Jonathan Buffalo, NAGPRA Rep.	349 Meskwaki Road		Tama	IA	52339	<a href="mailto:adminast.council@meskwaki-nsn.gov">adminast.council@meskwaki-nsn.gov</a>
<b>Other Individuals/Organizations Contacted</b>							
Dane County Historical Society	Richard Bernstein, Office Manager	3101 Lake Farm Road		Madison	WI	53711	<a href="mailto:danecountyhistory@gmail.com">danecountyhistory@gmail.com</a>
Historic Madison, Inc.	Mark Gajewski	PO Box 2721		Madison	WI	53701	<a href="mailto:mkgajewski@aol.com">mkgajewski@aol.com</a>
Madison Trust for Historic Preservation	Kurt Stege, President	PO Box 296		Madison	WI	53701	<a href="mailto:info@madisonpreservation.org">info@madisonpreservation.org</a>
UW-Madison, Historic Preservation Planning	Daniel Einstein	30 N. Mills Street, 4th Floor		Madison	WI	53715	<a href="mailto:daniel.einstein@wisc.edu">daniel.einstein@wisc.edu</a>
Madison Landmarks Commission	Heather Bailey, Staff Liaison						<a href="mailto:landmarkscommission@cityofmadison.com">landmarkscommission@cityofmadison.com</a> <a href="mailto:hbailey@cityofmadison.com">hbailey@cityofmadison.com</a>
Hill Farms Association	Mike Lawton, Chair						<a href="mailto:milawton@boardmanclark.com">milawton@boardmanclark.com</a>
Capitol Neighborhoods, Inc.	Eli Judge, President	P.O. Box 2613		Madison	WI	53701	<a href="mailto:info@capitolneighborhoods.org">info@capitolneighborhoods.org</a> <a href="mailto:president@capitolneighborhoods.org">president@capitolneighborhoods.org</a>
State Street Business Owner	Carmelo Alfano						<a href="mailto:calfano@gmail.com">calfano@gmail.com</a>
Mullins Group	Sue Springman						<a href="mailto:sue@mullinsgroup.com">sue@mullinsgroup.com</a>

## Madison East-West BRT Project Section 106 Consulting Parties Meeting

### Record

Meeting Date: **Tuesday, September 14, 2021**

Time: **10:00 AM – 11:30 AM**

Location: Zoom

1. Introductions and Meeting Purpose  
*Facilitator Adele Hall, SRF Consulting Group*

Adele Hall asked all participants to introduce themselves. Attendance at the start of the meeting included Mike Cechvala, Graham Carey (City of Madison); Heather Bailey (Madison Landmarks Commission); Greg Rainka (Commonwealth Heritage Group); Elizabeth Breiseth (Federal Transit Administration); Mark Buechel (National Park Service); Kimberly Cook (State Historic Preservation Office); Mike Lawton, Joe Keyes (Hill Farms Neighborhood Association); Sue Springman (Mullins Group); Carmelo Alfano (business owner on State Street); Adele Hall, Eavan Moore (SRF Consulting Group, Inc.)

They were joined partway through the meeting by two other Hill Farms residents, Russell (last name not given) and Dave Tobin.

2. Project Overview  
*Mike Cechvala, City of Madison*

Mike Cechvala briefly described the origins and status of the East-West BRT project. Bus Rapid Transit is designed for speed and efficiency. The three new color-coded lines (Red, Green Line, Blue) would speed up travel across the city. Related to BRT, a transit network redesign is occurring. The outcome of that process will determine whether BRT will serve the West Transfer Point shown on the map.

The project originated with planning studies around 2013; it received the city's authorization to proceed in 2017. It is currently in the project development phase, finishing up 30 percent design and conducting environmental analysis. Construction is scheduled to start in 2023.

### Q&A

Sue Springman asked for clarification on which trips would be faster, as BRT does not reach everywhere in the city. Mike Cechvala explained that the City can model average trip times throughout the city. BRT would substantially increase access throughout the city – people directly on the corridor would benefit most, but anybody will benefit from transferring to a system that gets across town faster. Right now, people transfer from one local bus to another, perhaps a third. Local buses stop frequently and wait in traffic. The city is hearing that the longest trips across town are simply too long.

## Consulting Party Meeting #1 Summary - 9/14/2021

### 3. Overview of the Section 106 Process

*Greg Rainka, Commonwealth Heritage Group*

Greg Rainka explained that all federally funded, permitted, or licensed projects must include consideration of effects to historic properties. In this case, the federal agency is the Federal Transit Administration (FTA). Two questions must be answered: Does the proposed project have any effect on a historic property? And if so, will those effects be adverse?

A historic property is one listed on or eligible for the National Register of Historic Places. The criteria for evaluation include association with significant events, people, architecture, or archaeological information. Historic integrity includes the setting, materials, location, workmanship, design, feeling, and association.

The area that is reviewed is known as the project's "Area of Potential Effects" (APE). FTA determines the APE in consultation with the State Historic Preservation Office (SHPO). The SHPO concurred with the East-West BRT APE in May 2021.

There are four steps to the Section 106 process. From a consulting party point of view, Step 1 is when they are first notified. Step 2 includes identifying historic properties. The project is currently transitioning into Step 3, assessing effects on historic properties. Step 4 is the resolution of adverse effects on historic properties. This could end with an agreement document of some type, outlining stipulations of what needs to be done to resolve those adverse effects.

### Q&A

Mike Lawton asked to see the APE, noting that the neighborhood association was not part of defining it. He also asked that meeting materials be sent out well in advance in future; receiving them this morning did not afford enough time for review.

Adele Hall answered that the APE would be shown in an upcoming segment of the presentation. The project team can also send out materials further in advance of meetings. She added that participants should feel free to review materials after the meeting and send follow up comments.

Mark Buechel noted that the Wisconsin State Capitol is a National Historic Landmark in the corridor, which involves a higher level of significance/protection.

### 4. Section 106 Surveyed Properties and Results

*Greg Rainka, Commonwealth Heritage Group*

Greg Rainka demonstrated the mapping done to identify parcels within the APE, which was defined as the 100-foot radius around each station location. On Mineral Point Road, the APE includes all properties adjacent to a planned shared-use path associated with the project. Additional properties were added to a few other locations as well.

## Consulting Party Meeting #1 Summary - 9/14/2021

### Q&A

Mike Lawton asked about the station at Rosa Road and Mineral Point Road which is in the Hill Farms Neighborhood. Greg Rainka said that while that station may be in the neighborhood, it is not in the National Register historic district, though Garner Park is.

Mike Lawton asked if any other single-family residences along Whitney Way were included. He said that it seemed a narrow, cramped interpretation of the affected area.

Greg Rainka answered that the marked parcels are located where the median-running stations will be constructed.

Mike Lawton noted that the project is doing construction in other areas as well. Mike Cechvala answered that the only change elsewhere would be pavement markings. There are some changes at Whitney/Sheboygan, so those parcels have been marked.

Mike Lawton asked whether the final agreement would stipulate construction only in specific locations.

Elizabeth Breiseth (FTA) said that the consulting parties would be re-engaged if the design changed. The process would not be totally restarted, but people would be alerted to the change and the APE would be adjusted if needed.

Mike Lawton asked again about the residences near the path on Mineral Point Road. Greg Rainka said that the entire historic district was being considered, but the greenspace path is what falls within the APE. Mike Lawton said it seemed inconsistent not to include those residences.

Returning to the subject of Whitney Way, Mike Lawton asked whether the project team had anticipated that the Regent Street station area will become a transfer point, with more traffic and more parking on Regent Street. Mike Cechvala answered that this station would likely serve no more than the BRT and one to two other intersecting routes.

Mike Lawton said that people would drive in to use the bus, noting that neighbors have observed this at Regent and Eau Claire before. He questioned why only houses near the station were included when houses down Regent Street could be affected by parking. He also expressed concern that the neighborhood would be affected by redevelopment attracted by BRT.

Mike Cechvala asked whether there was a deadline for comments to be submitted. Elizabeth Breiseth asked for comments to be submitted October 1 if possible, so that there would be time to consider and address them in the reports to be submitted in early November.

Mike Lawton said that he would need to present to a neighborhood association committee. Elizabeth asked when he could reasonably expect to provide written comments. Mike estimated three weeks, and she said that would be fine.

Mark Buechel commented that normally when you impact the edge of a district, the entire district is in the APE. There is a similar project in Milwaukee, and the entire historic district is included in the APE.

## Consulting Party Meeting #1 Summary - 9/14/2021

Greg Rainka answered that the district is in the APE, and they can show those maps as well.

Mike Lawton then suggested removing the slide with individually-marked parcels and showing the whole area.

Adele noted that the map with historic district boundaries is coming up later in the presentation.

Joe Keyes said that he wanted to reiterate Mike Lawton's point about the park-and-ride. He lives three houses away from the Regent/Whitney Way intersection, and there are already people using Regent as a park-and-ride for a couple of houses on either side. If things go as the mayor intends – with everyone encouraged to use BRT by the lane and speed reductions on Whitney Way – then more people will park there. He also suggested looking at Buffalo Drive and Greenlake Pass to see the effects of parking. Finally, he agreed with Mike that the marked parcels on the map should be expanded.

At this point, Joe Keyes had to leave and there were two newcomers. Adele asked them to introduce themselves. Dave Tobin lives in Hill Farms and is interested in this topic. He would like to see the results of a traffic study showing the impacts of the Whitney Way lane reduction, 460 new residential units at Westgate Mall, and another large number of units at Madison Yards.

### 5. Station Design Process

*Mike Cechvala, City of Madison*

Mike Cechvala discussed the design competition that led up to the proposed station design. The prize was set at \$10,000 – cost-effective for the city and meaningful for the winner. 67 submissions were received; 50 made it past the initial screening for practicality and completeness; 23 made it past the architectural review for buildability; and the Urban Design Commission chose a winner in May 2021. The project team is now in the process of refining the winning design for construction. The intention is to have a uniform design for all stations, to the extent possible, for both aesthetic and practical reasons. The green roof in the winning design is being analyzed to see if it is practical.

### Q&A

Mike Lawton asked for the State Street version of the station. Adele Hall answered that would be in the next segment of the presentation.

Mark Buechel said he was leery of design competition results because the design tends to be highly visible, and construction near historic properties should be minimal, simplistic, and transparent. They should blend in. He asked if that was considered during the process. He also remarked that having stations look alike isn't always what's best. The identity of a location should be considered. Since the design has already been chosen, what will happen if this ends up being a visual effect – would the process start all over again?

Mike Cechvala responded that was a consideration in looking at applicants' designs: how they could be modified in historic neighborhoods.



## Consulting Party Meeting #1 Summary - 9/14/2021

Mike Lawton asked if the station design is considered midcentury modern. Mark Buechel said no, it's 2021. It's 'New Urbanism' if anything. Mike Lawton noted that the Hill Farms historic designation is midcentury modern. Mark Buechel pointed out that it would violate standards to make new construction look historic when it is not.

### 6. Effects

*Greg Rainka, Commonwealth Heritage Group*

Greg Rainka moved on to a location-by-location discussion of Section 106 effects, beginning with the University Hill Farms Historic District. This area was mostly platted by 1959 and most buildings were constructed by 1964. It represents a unique collaboration between the university and the City to meet the housing needs of a rapidly growing city. Its integrity remains high, and it includes many good examples of midcentury modern architecture. The district includes "contributing resources" that are historical as well as non-contributing resources that are not, but that are included to maintain continuous boundaries.

There are contributing resources adjacent to four proposed median station stations: Mineral Point Road at Whitney Way, Whitney Way at Regent Street, Sheboygan Avenue at Eau Claire Avenue, and Sheboygan Avenue at Segoe. There is also a new traffic signal proposed at the intersection of Whitney Way and Sheboygan.

Mike Lawton asked if there were planned signal changes at any other locations. Mike Cechvala answered that there would be a new signal at Segoe and Sheboygan. Any other changes would be to timing; at most, a phase would be inserted.

Greg Rainka showed a site plan of the Regent Street station. Upon a request from Mike Lawton, he confirmed that there would be no property acquisition on Regent. There just need to be ramps constructed to line up with crosswalks.

Mike Lawton asked for the dimensions of the station structure. The project team was able to tell him that the minimum width is 12 feet, this location would be 13 feet, and the length would be 60 feet. They did not recall the exact roof height.

Mike Lawton asked about the State Street station. Mike Cechvala answered that it would be 50 feet long, adding the bus is 60 feet long but the front and rear door are about 50 feet apart.

Mike Lawton asked about lighting. Mike Cechvala said there would be some level of pedestrian scale lighting and security cameras. Mike Lawton asked if details would be provided, such as candle power at so many feet, noting that the neighborhood requests this level of detail from developers. Mike Cechvala said he did not know.

Greg Rainka then presented a rendering of the median station at Regent Street. He noted that renderings were only produced for the most sensitive locations, as every rendering has an associated cost. The rendering shows a fairly open platform that could potentially include transparent glass panels in the middle section.

## Consulting Party Meeting #1 Summary - 9/14/2021

Mike Lawton asked what the wood-like material would be, and whether it would be durable. Mike Cechvala agreed that durability was the goal and said that the exact material had not been determined.

Mike Lawton asked about the metal structures – would they be impervious to rust, or would the bolts end up dripping rust down the side? He also asked whether the rooftop metal structures were structurally necessary or purely aesthetic. Mike Cechvala answered that the metal was part of the design approved by the Urban Design Commission. He believes that they are there for aesthetics, not structure.

Mike Lawton asked whether there would be people lining up at ticket kiosks. Mike Cechvala answered that the details are in development. Fare payment will be account based, and there will be a validator on each bus door. There will probably be a fare kiosk at the station so that people can add value to their accounts. There will not be roaming fare inspectors.

Mike Lawton asked about security measures. Mike Cechvala said there would likely be cameras and likely would not be an emergency phone.

The next stations shown were Sheboygan at Segoe, where buses operate in mixed traffic; University Avenue at East Campus Mall (the Bascom Hill Historic District); and State Street (State Street Historic District).

At State Street, Carmelo Alfano asked about the remaining sidewalk width after the platform and shelter are constructed. He said that sidewalks were widened in the late 70s and early 80s for pedestrian use, and now bus shelters are taking that space away.

Mike Cechvala said that the sidewalks would not be narrowed. The station would encompass the terrace between sidewalk and street.

Carmelo noted that on Saturdays and other busy days, pedestrians use every part of the sidewalk, including the terrace.

Sue Springman asked about snow removal. Mike Cechvala answered that it is a constant struggle. “We send crews out to clear stops constantly,” he said. The snowmelt system embedded in the concrete at each station will help. Sue said, “When we have a big snow event, I see a huge problem here. I see it already around the city.” She said that sometimes pedestrians have to climb over snowbanks. She also commented on intersection safety. State Street is very narrow and has a great deal of pedestrian traffic – it needs that for business success. Creating these stations, especially on corners where it is most dangerous, has the potential to cause problems.

Russell commented via chat: “As bus riding family, Sue brings up a lot of good points.”

At this point, the meeting had reached its scheduled ending time of 11:30 AM. Adele Hall asked if participants could stay for another 15 minutes.

Sue Springman asked about the Capitol Square station. She commented that the rendering ruins the view of the Capitol from across the street. She also asked whether there would be benches in the

## Consulting Party Meeting #1 Summary - 9/14/2021

stations, whether they would be heated, and what problems were anticipated with people sleeping there. Mike Cechvala answered that the stations would replace existing shelters. There is a tradeoff; you want to make them attractive for 15 minutes but not all night. They have not decided on heating.

In the interest of time, Adele asked that the remainder of the meeting focus on Section 106 impacts. There will be other opportunities to address other aspects of the project.

The next station shown was East Washington Avenue at Baldwin. The contributing resource adjacent to this station is the Gisholt Machine company building.

Sue Springman commented that this is currently a very unsafe corner, particularly with drivers turning. She asked whether safety improvements were planned for the intersection. Mike Cechvala answered that the eastbound left turn would be removed to fit the platform. He agrees that there is potential to look at safety improvements, especially traveling north-south on Baldwin.

Finally, the proposed station on East Washington Avenue at Fourth Street is adjacent to the Neo-Gothic Madison East High School. Sue expressed concerns about safety here as well. The median fence that the station would partly replace is there because students have been killed running across the street. She said she hoped there would be safety measures there, and Mike Cechvala agreed that that was a consideration at this location.

### 7. Closing and Next Steps

A late-arriving participant named Andrea Olson asked via chat whether the presentation would be shared online after the meeting. The project team agreed it could be uploaded to the city's website.

Sue Springman asked how to follow up with more questions and comments. Adele answered that directions would be included when the meeting summary is emailed out in a few days. Sue Springman asked whose meeting this was – Adele or the city? Adele answered that all BRT project meetings are coordinated together.

Sue Springman asked whether there had been any discussion of the economic impact of BRT. There are national statistics cited, but nothing local. Mike Cechvala answered that they are working on that, noting that City staff looks to examples around the country because there are no other BRT systems in Madison. Every city and corridor is different, but generally speaking BRT shows positive impacts for employment access and shopping.

Sue said that she asked out of concern about the impacts downtown. She is not convinced that BRT will benefit State Street and Capitol Square.

In addition to emailing comments, the next opportunity to participate in the project more generally will be Wednesday, September 29, at 6 PM on Zoom. Further meetings will be scheduled in October; see <https://www.cityofmadison.com/metro/routes-schedules/bus-rapid-transit/community-engagement> for updates. Heather Bailey also noted via chat that the Madison Landmarks Commission will be reviewing the project at a public meeting on September 20.

**Carmelo Alfano Comments and Responses**

Carmelo Alfano Comment	Project Team Response
<p>I feel there has been very limited opportunities for public comment regarding Section 106. From the Section 106 Process Standard Operation Procedures document available on the FTA website, “FTA must provide the public with an opportunity to comment on the undertaking and its effect on historic properties.”</p>	<p>The BRT project and alignment have had public involvement and engagement since the <a href="#">2013 Madison Transit Corridor Study</a>. Downtown routing was studied with public engagement in 2019/2020 and continues as design progresses. There have been few comments/concerns regarding historic properties received to date.</p> <p>This is early in the Section 106 process where the APE has been identified and resources have been inventoried, but project effects have not been determined.</p>
<p>I am hoping the FTA can provide more information regarding the type and level of public involvement required based on the nature and complexity of the undertaking, its effects, and the likely interest of the public in those effects. Again, per the Section 106 Process document, “for a CE, FTA Regional staff, in coordination with the project sponsor, will need to make other arrangements to provide the public with sufficient time and information to gather meaningful comments (e.g., posting Section 106 related information on the project sponsor’s website for 30 days) because there is not a NEPA public involvement requirement for CEs”. I feel information has not been shared in a timely manner to gather meaningful comments.</p> <p>For example, I find it unacceptable that documents were provided to consulting parties on the morning of the Madison East-West BRT Project Section 106 Meeting. This did not provide a sufficient amount of time for consulting parties to review the information and engage in a meaningful discussion with SRF Consulting and the City of Madison representatives.</p>	<p>The BRT public involvement process has been broad, and will continue to seek public input. Since project kickoff in December of 2018, there have been 31 public and committee meetings, with another 17 meetings with special groups. Much of this involvement was formative in the routing for the Locally Preferred Alternative (LPA). The project will continue to present information and gather input through project development.</p> <p>In spring/summer of 2021, the project began Section 106 investigations, with a consulting parties meeting in September, 2021. Section 106 materials were forwarded to consulting parties prior to the initial meeting, and 3.5 weeks were provided for comments. An additional consulting parties meeting is currently being scheduled for early December to discuss Section 106 effects.</p>
<p>Last-minute communication and a lack of transparency have been recurring issues between community members interested in Madison’s Metro Rapid and the City of Madison. For example, The City of Madison Landmarks Commission had a recent meeting with Section 106 as an agenda item. There were two documents for the meeting; one of which was 500 pages. As a consulting party, I did not receive notice from the City’s consultants or the City’s BRT project managers. I was made aware of the meeting and the documents by my Alderman 10 minutes before the meeting started. If I would have known of the meeting, I could have prepared and reviewed the document and let the City know of the error the consultants made in showing a bus stop in the wrong location on State Street. I would have also been able to better participate in the meeting along with other consulting parties that participated at the previous meeting.</p>	<p>The BRT project has regularly presented to City Boards, Commissions, and Committees (BCCs) since 2019, with roughly 15 presentations to BCCs in the last two years. This has helped to disseminate project information. Each BCC has its own notification process, largely using the City of Madison legistar and posting of agendas.</p> <p>Many of the public engagement presentations are located on the project website: <a href="https://www.cityofmadison.com/metro/routes-schedules/bus-rapid-transit/community-engagement">https://www.cityofmadison.com/metro/routes-schedules/bus-rapid-transit/community-engagement</a>. With key project documents located on the project website here: <a href="https://www.cityofmadison.com/metro/routes-schedules/bus-rapid-transit/project-documents">https://www.cityofmadison.com/metro/routes-schedules/bus-rapid-transit/project-documents</a>. Recordings of most of the BCC presentations are available in legistar - <a href="https://madison.legistar.com/Calendar.aspx">https://madison.legistar.com/Calendar.aspx</a>. Project staff will continue to post information in an effort to increase transparency.</p> <p>The purpose of the BRT Landmarks Commission presentation on September 20 was to introduce the project, as they also are a consulting party under Section 106. The Landmarks Commission did not have an actionable item nor make a formal comment at this September meeting. Following the meeting it was discovered that one of the State Street station visuals was incorrect. This was corrected on September 22.</p> <p>The Determination of Effects Report will be available to the public on November 24, subject to FTA review and approval.</p>

**Carmelo Alfano Comments and Responses**

Carmelo Alfano Comment	Project Team Response
	<p>A second consulting parties meeting is currently being planned for early December. The report findings will also be presented to the Landmarks Commission at their December 13<sup>th</sup> meeting. It is anticipated that the Commission will include a discussion and potential action regarding the determination of effects.</p>
<p>Area of Potential Effects (APE)</p> <p>The “Area of Potential Effects” (APE) seems too narrow to focus solely on properties within a 100-foot radius of each station, especially in a historic district such as State Street. Will not the entire route be potentially affected with increased bus traffic? Per what was presented in public meetings with the City of Madison, 60’ articulated buses will run down State Street every 2.5 minutes—taking into consideration two-way traffic with routes running every five minutes—once the full Metro Rapid system (East to West and North to South) is implemented. Simple analysis of data provided by the City of Madison shows that buses will stop on State Street 35% more often, totaling 432 stops per day.</p> <p>This is well over the 321 current bus stops per day in 2021, yet Mayor Rhodes-Conway and City of Madison representatives continue to argue there will be 50% less bus traffic once Metro Rapid is operational. I am also skeptical (sic) of this claim as the current Transit Network Redesign for local bus routes is currently in progress and therefore specific information about routes and frequency of buses have yet to be determined. I find this grossly misleading and question whether the information SRF Consulting and the FTA are receiving to work through Section 106 is accurate.</p>	<p>The APE was delineated in consultation with the FTA and is consistent with projects of this type and Wisconsin architecture/history survey standards. The SHPO reviewed the APE and commented that it was appropriate.</p> <p>The following are estimated weekday bus volumes on upper State Street:</p> <ul style="list-style-type: none"> <li>2019: 618</li> <li>2020 (COVID reduction): 468</li> <li>2022 (Some routes moved to West Washington in preparation for BRT): 288</li> <li>2024 (Following BRT and redesign): 368</li> </ul> <p>Compared to 2019, total bus volumes on State Street will be reduced by about 40%. Rush hour bus volumes, which before the pandemic, had frequently bunched causing excessive noise and emissions, will be reduced by 60%. Bus volumes on the 400-600 blocks of State Street will be eliminated entirely, and the total number of bus stops on State Street will be reduced from 10 to 2.</p>
<p>Direct effects—such as physical intrusion for properties directly adjacent to proposed BRT stations, changes in the view of or from a property due to BRT stations and larger buses, and noise/vibrations/visual changes along the entire route—will result as part of the proposed undertaking. Indirect effects, as outlined in the Section 106 Process document as “those caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable”, are also likely to occur.</p>	<p>The environmental document, referred to as a Documented Categorical Exclusion or DCE, will include disclosure of the direct effects of the BRT line—property acquisitions, visual effects, and noise and vibrations—as well as indirect effects such as increased real estate development.</p>
<p>Section 106 Process document, “FTA Regional staff and/or project sponsors may also seek information from organizations or individuals that may have knowledge of historic properties regardless of whether they are a consulting party”. While I recognize this is not a requirement, there are a number of organizations (i.e. Madison’s Central BID, Downtown Madison Inc.) and individuals with understanding of the significance Downtown Madison who could have provided more insight but were not contacted. Additionally, no downtown stakeholders were invited to be consulting parties on the process. Stakeholders, such as myself, had to find out on our own that this opportunity existed.</p>	<p>The public has had opportunities to comment on the project and public involvement continues to be ongoing and an important part of the project during project development.</p> <p>The APE was defined in consultation with the FTA and is consistent with projects of this type and Wisconsin architecture/history survey standards. The SHPO reviewed the APE and commented that it was appropriate.</p> <p>The following organizations and tribes were invited to be consulting parties:</p> <ul style="list-style-type: none"> <li>• Dane County Historical Society</li> <li>• Historic Madison, Inc.</li> <li>• Madison Trust for Historic Preservation</li> </ul>

Carmelo Alfano Comments and Responses

Carmelo Alfano Comment	Project Team Response
<p>Overall, it is my belief that the APE is not sufficient to account for both direct and indirect effects and can be refined as the undertaking or analysis progresses.</p>	<ul style="list-style-type: none"> <li>• UW-Madison, Historic Preservation Planning</li> <li>• Capitol Neighborhoods, Inc.</li> <li>• Hill Farms Neighborhood Association</li> <li>• Bad River Band of Lake Superior Chippewa Indians of Wisconsin</li> <li>• Forest County Potawatomi Community of Wisconsin</li> <li>• Ho-Chunk Nation</li> <li>• Lac Vieux Desert Band of Lake Superior Chippewa Indians</li> <li>• Prairie Band Potawatomi Nation</li> <li>• Prairie Island Indian Community Minnesota Mdewakanton Sioux</li> <li>• Red Cliff Band of Lake Superior Chippewa Indians of Wisconsin</li> <li>• Sac and Fox Nation of Missouri in Kansas and Nebraska</li> <li>• Sac and Fox Nation of Oklahoma</li> <li>• Sac and Fox of the Mississippi in Iowa</li> </ul>
<p>State Capitol Building</p> <p>Regarding the Capitol Square station locations, the renderings presented block views of the Wisconsin State Capitol from across the street. With the State Capitol being listed as a U.S. National Historical Landmark, the historic significance of the building should be carefully considered before making major changes to this area. Both the City of Madison and community members have listed the outer Capitol Loop as an alternative route, and I question why this option isn't being considered. In addition to maintaining the historic character of the Capitol Square, the outer Capitol Loop would result in decreased transit times, with more economic development opportunities, less reroutes, permanent stations, and stations closer to the job density on the south side of the Capitol Square.</p>	<p>The Capitol Square has been historically used by transit for 100 years. The 2019/2020 Downtown Routing Report presents alternatives analysis and evaluation and is available at this link: <a href="https://www.cityofmadison.com/metro/documents/brt/BRTDowntownReport2-Jan2020.pdf">https://www.cityofmadison.com/metro/documents/brt/BRTDowntownReport2-Jan2020.pdf</a>. This report was used as part of the TPPB and Common Council approval of the LPA approval- legistar 59665 <a href="https://madison.legistar.com/LegislationDetail.aspx?ID=4337438&amp;GUID=50EA0677-AA71-42AF-97EE-22850426AF42">https://madison.legistar.com/LegislationDetail.aspx?ID=4337438&amp;GUID=50EA0677-AA71-42AF-97EE-22850426AF42</a> and legistar 63184 <a href="https://madison.legistar.com/LegislationDetail.aspx?ID=4702748&amp;GUID=00D4388B-E237-4C30-A862-664432575BA7">https://madison.legistar.com/LegislationDetail.aspx?ID=4702748&amp;GUID=00D4388B-E237-4C30-A862-664432575BA7</a>. The report evaluated the Capitol Loop (Dayton, Fairchild, Doty, and Webster Streets). It was eliminated from consideration largely because station pairs would be too far apart (0.4 miles). This distance impact to transit riders would be disproportionately borne by disabled, low income, and persons of color. Additional reasons are included in the Downtown Routing report.</p> <p>Effects to the Wisconsin State Capitol are being assessed and considered in accordance with Section 106.</p>
<p>Equity Over Historic Significance?</p> <p>With the Network Transit Redesign in progress, the City's BRT project managers explained at the Community Outreach (BRT 30% Completion) meeting on Wednesday, September 29th that roughly every other bus stop will be eliminated throughout the local network to accommodate Madison Metro Rapid. Why is it acceptable for individuals in far-reaching areas, who already have limited access to Madison Metro, to have to walk even further to a bus stop?</p>	<p>Bus stop consolidation for local routes is not inherently planned in either the BRT project or the Transit Network Redesign study. Metro's standard for bus stop spacing outside BRT corridors is 3/16 to 1/4 mile.</p>
<p>It feels this is a double standard that the City of Madison is pushing "front door access" for stops on State Street and the Capitol Square (at the historically</p>	<p>The Capitol Square and State Street are both historic and current transit corridors with existing bus routes, bus stops, and bus shelters.</p>

Carmelo Alfano Comments and Responses

Carmelo Alfano Comment	Project Team Response
<p>expense of the downtown neighborhood) while other areas will suffer. Again, I question why alternative routes—i.e. station locations at cross streets, such as Johnson at State or Gorham at State—were never seriously considered. Both equity and historic significance could be upheld by an alternative route, maintaining access to the downtown with stops being relocated only feet away without detracting from the pedestrian-focused ambiance of the neighborhood.</p>	<p>Several alternative routes were investigated in the Downtown Routing Report (see link above) The route suggested using Johnson and Gorham Streets, Wisconsin Avenue, the Capitol Loop, and East Washington Avenue was eliminated from consideration partly because of the distance between station pairs (placing a disproportionate burden on transit riders) as well as the circuitous, and unreliable travel times compared to the existing bus routes using State Street and the Capitol Square. The alternate routing would provide longer transit travel times and longer walking distances than what exist today, which is contrary to the purpose and need of the BRT project.</p>
<p>Economic Impact</p> <p>Myself and others have repeatedly questioned the economic impact of Metro Rapid in Madison. National statistics have been cited, but nothing local has been presented. While other cities have shown positive impacts for employment access and shopping/dining/cultural neighborhoods, we feel translating these stories to Downtown Madison becomes tricky for several reasons. To my knowledge, there have not been other pedestrian-focused areas that have added a BRT line, and Madison’s geography and layout provide additional challenges</p>	<p>A briefing of the possible economic effects of BRT was presented at the September 2021 Transportation Planning and Policy Board (legistar 67427) and the briefing paper can be reviewed at this link: <a href="https://madison.legistar.com/View.ashx?M=F&amp;ID=9821634&amp;GUID=DD652AAA-EF92-4211-B6AA-8DE2186C07F7">https://madison.legistar.com/View.ashx?M=F&amp;ID=9821634&amp;GUID=DD652AAA-EF92-4211-B6AA-8DE2186C07F7</a>. Much of this information will be included in the environmental document for this project. References to this information will be incorporated in the Section 106 documentation, which is the focus of this response.</p>
<p>Madison’s downtown is more similar to a small European city than many small American cities. In Europe, transportation runs adjacent to narrow streets with shops and restaurants to provide access for pedestrians while maintaining a space for those to gather. We can understand that adding a dedicated BRT line to a busy downtown street (i.e. Chicago, Seattle) does not significantly impact the feeling of their district, but we beg to differ about the BRT’s impacts on the downtown. Furthermore, with no data to suggest how Metro Rapid will economically impact adjacent areas, why were stakeholders not consulted on their viewpoints/experiences of how BRT will impact their businesses/properties? It seems shortsighted that the City of Madison and SRF Consulting are reaching toward national statistics in cities dissimilar to our own when local stakeholders with years of experience would be able to provide insight.</p>	<p>A briefing of possible economic effects is available at the link referenced above.</p> <p>Within the United States there are examples of successful pedestrian and transit corridors, such as Denver’s 16<sup>th</sup> Street mall.</p>
<p>With no data presented by the City of Madison to support their claim that placing the station on State Street or the Square would provide the best economic growth, I fear that the historic character of State Street will be diminished by routing BRT down our small street. Long-lasting impacts and limited room for future growth should not be taken lightly.</p>	<p>The purpose and need of the project is not economic development, although this could be an ancillary benefit of the project. The project’s purpose is to <i>implement a transit investment that will accommodate anticipated growth in travel demand, support mobility options for all Madison residents, leverage existing transportation infrastructure to improve connectivity, and encourage sustainability transportation and land use patterns that reduce reliance on single-occupant motor vehicle trips.</i></p> <p>State Street is a heavily used public transportation corridor, partially constructed with FTA funds. Generally the project will</p>

**Carmelo Alfano Comments and Responses**

Carmelo Alfano Comment	Project Team Response
	<p>decrease bus volumes from 2019 conditions, and reduce the number of bus stops (many with shelters) from 10 to 2.</p>
<p>Pursuing a Categorical Exclusion (CE)</p> <p>As the City of Madison is working through a Categorical Exclusion under the environmental process, I have concerns that my comments will not be taken into consideration regarding Section 106 and other components of the environmental review. Once again, I feel it was intentional that the City was not transparent in sharing important information earlier in the process in order to abstain insight from those potentially affected by BRT.</p>	<p>The project continues to gather input and stakeholder comments are an important part of the design effort.</p> <p>The Locally Preferred Alternative largely uses existing transit routing with no significant impacts to the built and natural environments. Right of way acquisition is modest and there are no relocations. With the introduction of electric buses, air and noise impacts are also expected to decrease.</p> <p>For State Street bus volumes decrease, diesel bus volumes decrease, and bus stops are reduced from 10 to 2. Discussion of the significance of the action will be included in the environmental documentation for the project.</p>
<p>In summary, I feel the APE is disappointingly narrow for the scale of Madison's BRT project and seems to diminish the historic significance of Downtown Madison. The City of Madison has lacked transparency and honesty throughout their public process, and I feel that Section 106 has been no exception. The lack of opportunity for public comment on this process, last-minute information sharing, and unclear answers to questions have limited opportunities for meaningful conversations between the City of Madison, SRF Consulting, the FTA, and stakeholders</p>	<p>As mentioned, the APE was delineated in consultation with the FTA and is consistent with projects of this type and Wisconsin architecture/history survey standards. The City seeks to provide transparency in the decisions through public engagement opportunities, the project website, and the City's BCC process. The development of the LPA involved over 31 public and committee meetings, as well as 17 focus groups. A summary of the Phase 2 public involvement process is available at this link:  <a href="https://www.cityofmadison.com/metro/documents/brt/2019_11-04-MadisonBRT-Public-Engagement-Final-Summary-Report_Final.pdf">https://www.cityofmadison.com/metro/documents/brt/2019_11-04-MadisonBRT-Public-Engagement-Final-Summary-Report_Final.pdf</a>.</p> <p>The Common Council's approval of the LPA in March of 2020 (with a revision in January of 2021), solidified the BRT routing. Since then, the focus has been on project development and understanding the effects, including Section 106 impact, of the LPA.</p>
<p>I would like to remind you that the Locally Preferred Alternative (LPA) was approved with no discussion at the very first virtual city meeting held because of COVID-19 pandemic. It was put on the consent agenda, and Alders were led to believe that it needed to be approved quickly to qualify for a Small Starts grant. Our city council, Downtown Madison's Central BID, and Downtown Madison Inc were told that downtown routing would be revisited in a collaborative effort to determine the best and most effective downtown route. Since this spring, Mayor Rhodes-Conway and Madison's BRT project managers regularly tell us that the council has approved this route twice and it's done. I bring this up to convey the miscommunication that has occurred from the beginning of this project.</p>	<p>The LPA was discussed at six board, committee, and council meetings before the COVID crisis, and numerous others during the pandemic.</p> <p>The consent agenda is used to pass items that have been through the referral list and where no objection is raised by an alder. The Common Council passed the LPA on March 31, 2020. Nine months ensued with further interactions with stakeholders to refine the alignment and project details (including center running and west and east terminal). After this effort, the LPA was again passed with revisions on January 5, 2021.</p>
<p>Madison's Metro Rapid does not need to route via State Street and the Capitol Square at the expense of our pedestrian friendly, historic center. State Street became a pedestrian mall in the late 1970s, limiting non-essential traffic and widening sidewalks/terraces to</p>	<p>Prior to the reconstruction of State Street in the mid 2000's, the City went through a 14 month interactive process to develop the current geometry of State Street. The State Street Design Project Oversight Committee met 69 times to evaluate geometric details, and the resulting State Street Design Report is available upon request. Portions of the</p>



## Carmelo Alfano Comments and Responses

<b>Carmelo Alfano Comment</b>	<b>Project Team Response</b>
<p>promote the community and visitors to spend the day downtown. Implementing Metro Rapid on State Street seems contradictory to the entire mission of the street and will undoubtedly affect the historic feeling and association of our downtown. Instead of the sidewalks and terrace being used by pedestrians as intended, Metro Rapid will take away that space, obstruct views, and create new foot traffic patterns throughout State Street.</p>	<p>subsequent State Street reconstruction were funded by FTA monies, establishing the existing transit role of the corridor.</p> <p>The BRT project leaves the State Street geometry unchanged from the design and construction of this report except for the establishment of two stations in the 200 and 300 blocks. The stations will be fully incorporated in the terrace areas of the street and will not reduce pedestrian walkways. The remaining 8 stations/bus stops will be removed with the implementation of BRT.</p>

## Hill Farms Neighborhood Comments and Responses

Hill Farms Neighborhood Comment	Project Team Response
<p>The historical review should include all properties within one half mile of the BRT route within the historic district as this is the area that the Madison planning dept. Is considering for a BRT zoning overlay district using the federal BRT planning grant they received. What is good for the City should be good for us.</p>	<p>The APE was delineated in consultation with the FTA and is consistent with projects of this type and Wisconsin architecture/history survey standards. The SHPO reviewed the APE and commented that it was appropriate. It is based on how a BRT station is likely to affect the contributing factors that make a property or district eligible for the NRHP. Redevelopment pressures, which could include a possible TOD overlay district, would be indirect effects associated with the proposed action. Indirect and cumulative effects will be discussed in the environmental document.</p>
<p>All property on Whitney Way should be studied as the City has already installed no parking signs in support of the BRT on all of Whitney Way.</p>	<p>The No-Parking sign were installed as part of a Vision Zero initiative that included lowering speed limits on numerous roadways throughout the City. Parking was restricted to allow the installation of buffered bike lanes. The buffered bike lane installation is independent of the BRT runningway, has a different purpose and need, and uses a Vision Zero funding source. BRT can operate with or without the buffered bike lanes. This action by the Transportation Commission can be seen in legistar 64987. An August 2021 memo describing the independent utility of the buffered bike lanes is available upon request.</p>
<p>Our neighborhood must be involved in the final design of the bus stations and their related site plans and in considering the spillover effects such as parking and security issues. The City has agreed to change the design on State Street stations, so they should work with us as well.</p>	<p>The BRT project has and will continue to both pursue and consider public input. Further opportunities for comment will continue throughout the project development process. Decisions associated with the project design, including station design, are subject to Madison's Commission, Board, and Council process. Neighborhood requests can be accommodated within that framework.</p>
<p>In particular there should be a written agreement that provides for an enforceable agreement on the station design, site plan, zoning and parking regulations within a quarter or half mile of each station, lighting, signage and security for each station in the historic district. Hill Farms should be a party to the agreement.</p>	<p>BRT stations are a public asset within public right of way serving a public purpose. Neighborhood concerns will be considered within the project development engagement process. The City does not enter into enforceable agreements with neighborhoods on other public infrastructure projects. As mentioned, the neighborhood is able to express opinions and comment within the project's public engagement process which will be considered in the project design. Madison's Commission, Board, and Council process also provides a vehicle for residents to express their concerns.</p>
<p>Our neighborhood has been adversely affected in the past by poor city planning which resulted from parking issues tied to bus patron parking at bus stops in residential neighborhoods. Please have the people doing the study talk to us directly to get the facts about this. We do not want our streets and driveways blocked in the winter and emergency vehicles impaired for example. If the City wants transit centers, they should locate them where there is proper parking.</p>	<p>On-street parking is not a contributing factor to the Hill Farms historic district. In Madison, property owners are not assessed for on-street parking and on-street parking is community asset for use by residents and visitors. On-street parking is sometimes used throughout Madison to support transit uses. Whitney Way is an existing transit corridor with 8 bus stops and about 495 weekly routings (2018). BRT will replace this service and ridership.</p> <p>Where there is a parking shortage, existing Madison General Ordinances (MGO 12.138) provides a process for establishing a residential parking permit program, providing a way for residents to preserve on-street parking where there is a shortage. The Hill Farms neighborhood lies in Areas 20 and 25 of this program and some Hill Farms residents have implemented this on their street.</p>
<p>We reserve the right to supplement these comments in the future. Thanks.</p>	<p>The project team will continue to provide opportunities for public and neighborhood comment throughout the project development process.</p>

## Madison East-West BRT Project Section 106 Consulting Parties Meeting

### Record

Meeting Date: **Thursday, December 9, 2021**

Time: **9:00 AM – 11:00 AM**

Location: Zoom

#### 1. Introductions and Meeting Purpose

*Facilitator Adele Hall, SRF Consulting Group*

Adele Hall asked all participants to introduce themselves. Attendance included Mike Cechvala, Graham Carey (City of Madison); Heather Bailey (Madison Landmarks Commission); Greg Rainka (Commonwealth Heritage Group); Elizabeth Breiseth, Susan Weber (Federal Transit Administration); Mark Buechel (National Park Service); Kimberly Cook (State Historic Preservation Office); Mike Lawton, Joe Keyes (University Hill Farms Neighborhood Association); Sue Springman (Mullins Group); Adele Hall, Eavan Moore (SRF Consulting Group, Inc.)

Adele gave an overview of the meeting participants and purpose. The City of Madison is the project sponsor. The Federal Transit Administration (FTA) is the lead federal agency. The State Historic Preservation Office (SHPO) advises FTA on Section 106 compliance and provides concurrence. The National Park Service gets involved when there are historic landmarks in corridors. This meeting will provide the consulting parties with an opportunity to review the anticipated effects on historic properties identified as part of Section 106 consultation and come away with an understanding of the project, the historic properties, and how the project may affect them.

#### 2. Refresh: Section 106 Surveyed Properties and Results

*Greg Rainka, Commonwealth Heritage Group*

Greg said that at the first consulting parties meeting in September, the consultation was on Step 2 (identifying historic properties) and moving into Step 3 (assessing effects on historic properties). Today's meeting is focused on Step 3, effects. A draft report detailing effects on historic properties was completed and distributed to consulting parties on November 23.

Greg refreshed the group on the Section 106 process. All federally funded, permitted, or licensed projects must include consideration of effects to historic properties. In this case, the federal agency is the Federal Transit Administration (FTA). The Area of Potential Effect (APE) was defined in May 2021 in consultation with SHPO, who found it appropriate.

A historic property is one listed on or eligible for the National Register of Historic Places. It is primarily an honorary designation, but also provides protection under laws like Section 106. The criteria for evaluation include association with A) significant events, B) people, C) architecture, or D) archaeological

## Consulting Party Meeting #2 Summary - 12/9/2021

information. Historic integrity includes the setting, materials, location, workmanship, design, feeling, and association.

The full list of historic properties identified within the APE includes:

- University Hills Farms Historic District – Listed on the National Register
- Bascom Hill Historic District – Listed on the National Register
- State Street Historic District – Determined eligible for the National Register
- Wisconsin State Capitol – Listed on the National Register and a National Historic Landmark
- Dane County Courthouse/Madison City Hall – Determined eligible for the National Register
- St. Patrick’s Roman Catholic Church – Listed on the National Register
- Breese Stevens Municipal Athletic Field – Listed on the National Register
- Kleuter Wholesale Grocery Warehouse – Listed on the National Register
- Gisholt Machine Company – Determined eligible for the National Register
- Madison East High School – Determined eligible for the National Register

Consulting parties provided verbal comments at the first meeting and two consulting parties provided written comments following the meeting. Greg said that the project team addressed the comments in the text of the draft report and also responded directly to the comments in an appended table.

Greg summarized the project team’s responses to the comments.

- In response to a comment that the APE might be too small, he said that it is consistent with projects of this type, and no comments were received that indicated additional historic properties the team missed. For these reasons, the project team feels the APE was appropriate. Greg noted that when an individual property falls within the APE, the entire district is considered.
- In response to a comment that public engagement was insufficient, Greg said that there have been 31 public and committee meetings since the project kickoff. There are more meetings planned, and information is shared on the project website. Greg asked Mike Cechvala if he had anything to add on this. Mike said no; the City’s formal responses are in the document.
- In response to a comment that alternative routes and stations were not considered, Greg said the project team’s understanding is that there were alternatives considered and investigated before a preferred alternative was selected.
- In response to a comment on parking, Greg said that there is a section in the draft effects report regarding current projects, and that section should answer the parking comment. He noted that one parking removal was part of a Vision Zero safety project, not the BRT project.
- In response to a comment on the City’s proposed transit-oriented development (TOD) zoning, Greg said his understanding was that this is an overlay district intended to support investment in use of public transit. It is anticipated that the effects of the overlay will be most pronounced in

## Consulting Party Meeting #2 Summary - 12/9/2021

areas where no historic properties were identified within the APE. It includes East Washington and Mineral Point Road west of Yellowstone. The City is recommending exclusion of historic districts from the TOD overlay.

### 3. Effects on Historic Properties

*Greg Rainka, Commonwealth Heritage Group*

Greg moved on to discussing the effects documented in the draft report. He reviewed the criteria for adverse effects. Adverse effects under Section 106 occur when an undertaking, such as the BRT project, may directly or indirectly alter characteristics of a historic property that qualify it as eligible for the National Register.

Examples of adverse effects include:

- Physical destruction or removal of a historic property.
- Alteration of a property not consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties.
- Change in the character of the property's use or of physical features within the property's setting that contribute to its significance.
- Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features.

The last two types of effects on the list are relevant to this project.

#### University Hill Farms

This University Hills Farms Historic District is listed under criteria A and C, as it has both historical and architectural significance. It was created by the University of Wisconsin – Madison as a community within a community in order to meet a postwar need for housing. It was mostly platted in 1959 and built by 1964.

The BRT will operate on Mineral Point Road and Whitney Way. Proposed stations at Mineral Point Road and Whitney Way, Whitney Way and Regent Street, and Sheboygan Avenue and Eau Claire Avenue are adjacent to parcels in the district, which means effects to the entire district must be considered.

The proposed Mineral Point Road and Regent Streets stations will be in the median. Another station in the vicinity of University Hill Farms is in the median on Sheboygan Avenue at Eau Claire Avenue, adjacent to the district boundary. There are large apartment complexes there that are contributing resources.

Another proposed station has been moved from Sheboygan Avenue to Segoe Road. It is still in the vicinity of the district, but it is outside the historic boundary and not adjacent to the historic district. The new traffic signals are proposed at the Sheboygan Avenue/Regent Street and Sheboygan Avenue/Segoe Road intersections.

## Consulting Party Meeting #2 Summary - 12/9/2021

Greg showed slides with a design schematic of the planned station at Whitney Way and Regent Street, a photo of existing conditions, and a rendering of the planned station. He pointed out a house in the photo that is a contributing resource, an existing bus stop near the house that consists of a pole, and modern streetlights. The rendering shows the proposed median station with shelter, flanked by red-painted bus only lanes.

Greg described the direct and indirect effects of the Regent Street station as follows:

- Addition of station introduces a new visual element to the streetscape but does not meet the criteria for adverse effect (will not diminish the district's historic integrity/character).
- Whitney Way is an existing transit corridor with eight bus stops and ~495 buses/week. BRT will replace this service. Projected 2024 weekday BRT buses = 128 (down from 156 in 2019).
- Bus patrons are currently parking in the neighborhood.
  - On-street parking is not a contributing factor to the University Hill Farms Historic District.
  - On-street parking is sometimes used throughout Madison to support transit use.
  - Madison General Ordinances provides a process for establishing a residential parking permit program is needed.
- TOD Zoning: City of Madison is considering implementation of TOD zoning in BRT station areas. City staff recommend that the ordinance exclude local and national historic districts.

Mike Lawton asked for the determination by architecture historical experts that the stations will meet the midcentury modern design of the neighborhood. Greg said he did not think the intent was ever to create a station that mimics the look and time period of the district, as creating a false sense of history is frowned upon. It is more beneficial to the district to create a more modern inclusion.

Elizabeth added that the Secretary of Interior standards have guidelines for how to introduce new construction in historic districts. The idea is to design something compatible and not create a false sense of history by mimicking something historic.

Mike said he did not see discussion of that in this document. Greg said he believed there is discussion in there. Mike asked for a page number. Heather Bailey began looking.

Mike asked about an issue in Milwaukee where stations had to be redesigned because they weren't consistent with some historical requirements. Elizabeth said that was correct, the Milwaukee East-West BRT did go back and forth on some shelter designs due to their location in front of some historic properties. They were made more transparent and smaller in scale to allow better visual sightlines to the historic buildings they were adjacent to.

Kimberly said that she is the reviewer for those projects. What her office looks for is that you look past the furniture to experience the historic structure. So they were looking for minimal impact in those examples. It would be the same here. She would caution against adding so much decoration that it interferes with experiencing the district.