

WisDOT Position Paper

for the

American Transmission Company's

Dane County Reliability Project

Proposed Transmission Facility using the Madison Beltline Corridor

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1. Introduction

The American Transmission Company (ATC) is proposing a 345-kilovolt transmission facility between its West Middleton and Rockdale substations in Dane County, and has developed three route alternatives for an in-depth study. Of these routes, one has been identified by the Wisconsin Department of Transportation (WisDOT) to impact the State Trunk Highway System in such a manner that warrants discussion and evaluation with regards to highway safety, operation, and future improvement, and hence the purpose of this position paper. That route alternative proposes the use of WisDOT highway right-of-way (R/W) along the Madison Beltline (USH 12). In addition, various segments of USHs 14, 18, and 151 also run concurrently with USH 12 in the project corridor.

2. Background

WisDOT and ATC met several times during the summer of 2006 to discuss the Beltline as a route alternative for ATC's proposed facility, including numerous details related to:

- Potential pole locations
- Construction techniques
- Facility maintenance and inspections
- Work zone traffic control
- Access during and after construction
- Other utility impacts
- Motorist delay during construction and maintenance
- Future WisDOT costs that would be borne by ATC
- Facility relocation in relation to future Beltline operational improvements (mainline expansion, interchange improvements, and collector-distributor road system construction and improvements)

As an outcome of that effort, WisDOT has documented several issues that have significant impacts to the viability of the Beltline should the transmission facility be placed along this freeway corridor. Consequently, WisDOT has **serious concerns** about the use of certain segments of the Beltline as proposed by ATC. However, WisDOT feels that there may be some Beltline segments that, in conjunction with other recognized ATC potential routes, could be viable for its project.

3. Summary of WisDOT's Main Concerns

WisDOT's main concerns related to the overall Beltline corridor use are:

A. R/W Use and Expansion

The existing Beltline R/W is a very valuable and very limited commodity, especially in the Verona Road to South Towne Drive area. This limited R/W creates an uncertain future for operational improvements with regards to potential high-cost public impacts if ATC's facility conflicts with a highway project. The ATC proposal assumes that most future pole moves would be accommodated in the existing R/W or may fit within what WisDOT needs to buy for operational improvements. However, there are several locations where those improvements would require ATC to either acquire its own new R/W, bury its facility within the R/W, or compensate WisDOT for substantially higher road construction costs to remain aboveground in the R/W.

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For example, the UW Arboretum is most likely unavailable as a source of new R/W, and the existing Beltline R/W adjacent to the Arboretum is nearly filled by existing roadways and utilities. In the Todd Drive to Rimrock Road section, addressing highway operational improvements would most likely require ATC facility relocation and consequently the acquisition of high-cost R/W from businesses that completely line both sides of the highway. These costs would be borne by the public no matter if ATC or WisDOT had to pay for them.

ATC may have to bury its facility as a result of highway operational improvements. Since this is an uncertain event with an undefined scope, ATC has not presented a contingency plan or discussed details of new costs for what could end up as significant additional costs to WisDOT, ATC or both. WisDOT also understands that constructing a portion of the transmission facility underground requires significant space and equipment to accomplish the transition from overhead to underground and vice-versa.

Assumptions have been made by ATC about the ability to obtain easements in the event future highway operational improvements require full utilization of WisDOT R/W. Those assumptions may not be realistic and should not be relied upon without fully evaluating the potential to obtain useful easements.

B. Protective Crash Devices

In several constrained areas where ATC proposes poles within the existing freeway clear zone, the installation of crashworthy barriers or some other protective crash device would also be required. Any type of fixed obstacle in the clear zone, including crashworthy barriers, creates a **new** crash hazard for an errant motorist who otherwise might be able to safely regain control or stop. In addition, these devices introduce new costs for installation as well as routine repair and maintenance each time they are hit. Those costs would be an obligation of the permit holder (ATC) since the devices are only needed to protect motorists from ATC's facility.

WisDOT expects the number of crashes and the crash-induced delay for motorists to both increase because of the barriers. Barriers may create additional costs for snow removal that, if necessary, would also be an obligation of ATC. Barriers also diminish the availability of distress lanes for disabled vehicles, incident response, and law enforcement use. ATC anticipates approximately 7,000 feet (1.3 miles) of beam guard or concrete barrier wall would be required to install the facility along the Beltline as proposed. Furthermore, WisDOT standards would likely require an additional 7,000 feet to eliminate gaps between closely spaced barrier segments. Estimated costs for motorists and maintenance can be reasonably estimated based on current engineering techniques, and WisDOT can assist with developing those costs upon request.

C. Underground Facility Impacts

One approach to overcoming some physical constraints in the corridor would be to construct all or portions of ATC's facility underground. WisDOT understands that an underground facility is technically feasible. The economic feasibility would need further analysis. There are certain issues that affect the transportation use of the corridor that would remain a concern if a choice were made to construct the facility underground:

1) Additional motorist delay

ATC assumes that frontage or local road lane closures would be necessary during the construction of an underground facility. This would add substantial motorist delay for two to three days for every 300 feet of underground construction, but it is not clear what that would correspond to as far as total hours of motorist delay cost. WisDOT anticipates that the motorist delay cost would be substantial, and the impacts would be far greater if any lane closures were needed on the Beltline.

2) Future facility relocation

ATC has suggested that due to the relatively substantial capital cost of constructing an underground transmission facility, once it has been constructed, there would be very little flexibility in adjusting, shifting, or overall moving it, as relocation costs would be prohibitive. This could prove problematic as the future operational improvements of the Beltline are not defined, and could be limited, or impacted by the decision of the location for ATC's underground facility.

3) Use of Beltline median

While the location within the Beltline R/W least susceptible for relocation due to future capacity expansion would be the median of the highway, this location would also be expected to create unacceptable impacts for motorists during initial construction due to permanent lane closures needed, bridge pier avoidance, and other constructability issues. It would also have the highest risk of causing future motorist disruption and delay. Besides the appearance of having limited feasibility, it is not currently allowed under WisDOT's *Utility Accommodation Policy*. An exception to this *Policy* would be required from the Federal Highway Administration before a longitudinal median installation would be allowed.

D. Construction Work Zone Impacts to Motorists

Current ATC estimates assume 146 poles would be necessary from USH 14 (Middleton) to Interstate 39/90 if the entire North Route (Beltline alternative) were selected. This means construction work zones would be needed for:

- Soil borings and site clearing
- Excavation and installation of the pole bases. Each base needs one full working day to complete. Since the poles are spaced 400 to 600 feet apart on average, it is conceivable that each pole may need its own work zone. When possible, a single work zone may be able to encompass several poles.
- Pole erecting. This operation takes slightly less than one full working day. Similar to the previous item, each pole location may need its own work zone.
- Pulling the lines and attaching them to the poles
- Restoration, cleanup, and access to work areas

Not every work zone would have a direct impact on Beltline traffic, but most would have some level of impact. Typically, a minimum shoulder closure on the Beltline would be needed to ensure safe operations and a buffer from daily traffic, so there is a continued expectation of passing traffic. On local and frontage roads, lane closures with flagging

operations may be required. Work zones impact the flow of traffic along a highway, and have the potential to cause major delays during peak hours and possible smaller impacts and delays during off-peak hours.

E. Direct Facility Access from Highway or Interchange Ramps

There is only one segment that proposes continued access to a number of poles along the corridor. There are, however, several pole locations that would require access via interchange ramps. When access is required for maintenance and other purposes, WisDOT will require lane and shoulder closures along the access points, which will affect the highway capacity and create obstacles for motorists. However, as previously discussed for construction, maintenance could also be restricted to nighttime operations thus further reducing motorist delay but likely increasing maintenance costs for ATC.

F. Federal Highway Administration (FHWA) Coordination

Coordination with FHWA may be required if any Beltline segment of the proposed ATC facility was approved for construction. FHWA may want to provide input on the aspects of the project that could impact the existing Beltline operations, as well as the potential for future operations.

G. Additional Public Costs

Consideration of transmission route alternatives should include ATC's identification of costs that would be incurred by the public, especially motorist delay related to facility construction, as well as added costs to WisDOT for Beltline operational improvements and maintenance as necessitated by ATC's facility. Estimated costs for motorist delay can be reasonably estimated based upon current engineering techniques, and WisDOT can assist with developing those costs upon request.

ATC proposes off-peak construction times, but with Beltline traffic volumes well over 100,000 vehicles per day, even during these off-peak times, frequent and lengthy motorist delays would likely be encountered if lane closures and other work zones were allowed. WisDOT feels that this would be unacceptable to the public.

A potential solution to reduce motorist delay would be restricting ATC to do the majority of its work at night. Recently, WisDOT completed improvements to the Beltline/Todd Drive interchange and frontage roads. A majority of that work, including lane closures and utility work, was accomplished at night. WisDOT feels that there will be extra ATC construction costs associated with nighttime work (estimated at 10%) based upon the Beltline/Todd Drive project. There will also be some motorist delay costs that may need to be accounted for associated with nighttime construction.

4. Details of Specific Beltline Impacts

For discussion of specific Beltline impacts, the highway was divided into the following segments:

- USH 14 (Middleton) to USH 18/151 (Verona Road)
- USH 18/151 (Verona Road) to South Towne Drive
- South Towne Drive to Interstate 39/90

A. USH 14 (Middleton) to USH 18/151 (Verona Road)

This segment also includes the short section of USH 14 from the Middleton substation to the Beltline. In general, there is enough WisDOT R/W to allow for anticipated improvements to USH 14, future Beltline operational improvements, and accommodation of the ATC facility with limited and tolerable impacts on the clear zone. Discussions with ATC have already resulted in adjustments to the proposed pole locations from the Middleton Substation to the Beltline to minimize impacts to future improvement needs on USH 14.

Accommodation of ATC's facility along USH 14 would be expected to cause some additional complications for future highway improvements as lines may be temporarily in the way of cranes and other equipment when at-grade intersections are converted to grade separations (interchanges and overpasses) in the future. Those operations could result in construction delays and additional costs to WisDOT as well as motorist delay on USH 14. Along the Beltline segment from USH 14 to USH 18/151 (Verona Road), this area is capable of accommodating the ATC facility with relatively minor impacts to motorists. This segment could be utilized as part of another ATC route that runs on a corridor along Verona Road south of the Beltline. The other Beltline segments do not lend themselves to be used independently to complete ATC's overall project as part of a hybrid solution.

Of the three segments of the Beltline corridor, this segment is best able to accommodate ATC's facility. WisDOT's specific concerns in this segment include:

- Added lanes or ramp configuration changes at interchanges could require future relocation of poles, but the probability of significant impacts to the facility is low.
- Construction timing and staging to repair any structures along this corridor may require temporary deactivation of the facility. Coordinating this activity may cause construction delays and higher costs to WisDOT.
- ATC's proposed pole locations include a limited number of sites that encroach upon the highway clear zone. These locations would require installation of a crashworthy barrier to protect the facility and motorists. These features involve additional costs for installation, operation, and maintenance that would be borne by ATC. The encroachments also increase risk to motorists. Addressing these encroachments requires additional coordination, but could probably be easily mitigated.
- ATC needs to have access to the facility for construction and maintenance. Access from the freeway or interchange ramps is generally not allowed as safety risks and motorist delays are unacceptable. ATC would need to investigate obtaining access from adjacent lands prior to WisDOT permit approval.

B. USH 18/151 (Verona Road) – South Towne Drive

This segment is by far the most challenging for ATC's proposed project.

WisDOT has extremely limited R/W, and future Beltline operational improvement options are already limited as the area is substantially developed right up to the existing R/W. Any level of future WisDOT work that would adjust the cross-section of the roadway would impact virtually all of the proposed poles in this segment. This area

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would be the most difficult for ATC if they were required to move its facility off WisDOT R/W based on the existing development. WisDOT has **serious concerns** about the use of this segment by ATC's facility because:

- Existing commercial development is numerous and crowded, so acquisition costs for additional land would be very high, whether needed for WisDOT work, ATC moves, or both.
- This segment has tightly spaced interchanges. Most also have substandard design features, so improvements to them could be significant from a cost perspective.
- The need to address highway capacity deficiencies in this segment is higher than in the other portions of the proposed route, and is expected to result in changes to the highway and interchanges that would impact the proposed ATC facility. Existing traffic volumes reaching 130,000 vehicles per day magnify any impacts to motorists along this segment because of the sheer volume and the high potential for delay for any service interruptions. This area has the highest probability for impacts to the ATC facility and poles of any of the three Beltline corridor segments.
- The UW Arboretum area causes severe complications due to its protected environmental status. WisDOT's R/W is currently constrained through that area, and ATC's facility would only further complicate WisDOT's ability to fit additional roadway features into the R/W where needed. If WisDOT were to expand the highway and require moving the ATC facility outside the highway R/W, it is unlikely ATC would be able to accomplish acquisition of R/W from the Arboretum. This would create a huge problem for the viability of the facility along the corridor, and could require a new alignment of the ATC facility. It could also mean that WisDOT would have to redesign its highway improvements to accommodate ATC's facility at a higher cost to WisDOT, which would be borne by ATC.
- R/W constraints in this segment leave little (if any) opportunity to erect an overhead transmission facility within the R/W while locating poles outside the highway clear zone. This would result in extensive use of crashworthy barriers to protect motorists and the transmission facility. This is **very undesirable** for WisDOT given the added hazard to motorists created by the barriers as opposed to preserving the highway clear zone, which provides safe recovery areas for errant vehicles. This accommodation would devalue the investment in the highway that was designed to protect safety through the preservation of that clear zone.

Use of barriers would also create concerns for highway operational activities such as incident response/management and snow removal since the barriers would constrain the area available for disabled vehicles, law enforcement stops, and snow storage. Any barriers used to mitigate the loss of clear zone would require a large amount of additional maintenance with ATC being obligated to pay for those costs. There are also motorist costs (e.g., property damage and injury) for vehicles that would hit a barrier in addition to the motorist delay associated with the required repair and maintenance efforts for the barriers. Highway maintenance workers are also put at-risk every time they would need to repair damaged barriers. WisDOT does not allow unprotected hazardous objects in the clear zone on high-volume

freeways to ensure a safe and cost effective highway corridor for the motorist. A clear zone unobstructed by hazardous objects or protective devices is always the safest product. Thus, beam guard and other hazard protection barriers are used, but only as a last resort for these types of highways.

C. South Towne Drive – Interstate 39/90

ATC's proposed facility along this segment would have very few impacts to the transportation function of the Beltline east of South Towne Drive if the facility could be located in the marsh area south of the Beltline. This ensures that the facility is far enough away from the highway to not impact WisDOT for any possible future expansion or construction. That potential depends on the ability of ATC to satisfy environmental requirements for that location.

Other WisDOT concerns include:

- ATC's plans require DNR approval to locate a number of poles in the marsh area south of the Beltline between South Towne Drive and USH 51 (Stoughton Road). No contingency plan has been presented if the DNR does not grant a permit. So additional impacts to the Beltline could result (as well as costs), but are unknown at this time.
- This is the only segment where ATC's proposed maintenance and construction would result in direct access from the mainline Beltline shoulder to the poles. This is highly undesirable from a safety perspective. Traffic volumes in this segment are relatively high and use of the Beltline for access would create motorist delays that WisDOT feels would be unacceptable to the public as well as creating additional safety hazards to motorists associated with congestion and backups when such access occurs. It is expected that this would be significantly reduced if the work were done during off-peak travel hours or at night.
- Unlike the USH 14 (Middleton) to USH 18/151 (Verona Road) segment, this section holds no independent value without traversing WisDOT's most impacted segment, Verona Road to South Towne Drive. The segment west of Verona Road could be utilized as part of other alternate routes identified that would run south of the Beltline at Verona Road.

5. USH 18/151 (Verona Road) Corridor Analysis: Beltline – CTH PD

The PSC has requested that ATC provide an analysis of underground options along a section of Verona Road from the Beltline to CTH PD. The section of Verona Road would be part of a hybrid route for ATC that connects the northern route (using the Beltline from USH 14 to Verona Road) with the middle route. WisDOT's comments address both aboveground and underground installations.

WisDOT is currently studying the Verona Road corridor from CTH PD to the Beltline and through to Nakoma Road. A preferred design alternative has not yet been selected and a reevaluation of alternatives in the draft environmental impact statement is underway. No matter what improvement is eventually selected, it is highly likely to include capacity expansion and a substantial change to some or all of the vertical alignment of Verona

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Road. Other changes could include a median barrier and a local road system on both sides of the corridor. Additional R/W will likely be needed as well. The environmental impact statement has not been finalized and construction funding has not been budgeted, but WisDOT's expectation is that these major changes will occur in the next 15-20 years and would almost certainly impact all utility facilities along the entire corridor.

It is very likely that this work will be done in stages starting with the portion from Raymond Road north to the Beltline and through to Nakoma Road. It would likely add additional thru lanes and numerous intersection capacity changes at the Beltline, Summit Avenue (Home Depot entrance) and Nakoma Road. This stage would be considered somewhere around 2013-14. It would also be an incremental step to further improvements including free flow ramps to and from the Beltline that would merge into Verona Road south of Raymond Road. The addition of free flow ramps also has no scheduled construction date, but appears to be as far out as 2025 or beyond.

Of all the major Verona Road changes, the one constant in this corridor is the Southwest bike trail. This trail is on an old railroad corridor and crosses under existing Verona Road north of Raymond Road. WisDOT must maintain clearance for trains in the event they would be reintroduced in this area. (Note: this is not likely, but the railroad company still owns the rights to the land if they would choose to reactivate the line). This may be a potential route to run an underground facility to CTH PD as it is very likely not going to change compared to how the Verona Road corridor will likely change.

WisDOT feels the most reasonable option for ATC is to locate its facility on the railroad corridor from the Beltline to CTH PD. The facility could come directly off the Beltline near the pedestrian overpass, or somewhere near the Verona Road/Beltline interchange and then use a portion of Verona Road to reach the railroad corridor. Any utility facility located along Verona Road south of the railroad corridor will almost certainly be in conflict with the future design concepts (including vertical realignment) that WisDOT is considering. So the more the railroad corridor can be used, the less likely there will be impacts to those plans.

Between the Beltline and the railroad corridor along Verona Road, WisDOT probably has some flexibility for the locations and depths necessary for ATC's facility that would be reasonable to accommodate. There does not appear to be a substantial highway impact since the overall vertical alignment will be less likely impacted. But WisDOT would still have concerns about ATC's facility location and depth in this section especially if there would be a need to transition the facility from aboveground to underground.

6. Cost Analysis

ATC has provided WisDOT with cost comparisons for the three routes as well as costs associated with burying the facility along the Beltline **(in millions of dollars and year 2011 present worth)**. The year 2011 was chosen because it would be ATC's construction year. ATC's estimates for construction and anticipated relocation costs are:

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ATC ROUTE	INITIAL CONSTRUCTION COST	POLE RELOCATION COST	TOTAL COST
North (Beltline)	\$ 98	\$16.7 – 26.2**	\$ 114.7 – 124.2**
Middle	\$ 115.3	\$ 0	\$ 115.3
South	\$ 110.0	\$ 0	\$ 110.0
Hybrid of South/Middle	\$ 113.8	\$ 0	\$ 113.8

BELTLINE SEGMENT	INITIAL UNDERGROUND CONSTRUCTION COSTS
Entire Route	\$ 225.8
USH 14 (Middleton) to South Towne Drive	\$ 185.3
Verona Road to South Towne Drive	\$ 104.3
Verona Road to Interstate 39/90	\$ 144.7

ATC took the agreed upon project impact effects to produce the present worth costs for the potential relocation of the poles. **To produce the costs, ATC used a 5% construction cost factor, and an 8.5% discount rate to determine net present worth (NPW) in 2011. WisDOT is concerned that those rates do not accurately represent 2011 NPW, and have shown as the higher end of the range, a 5% discount rate for comparison in the above table. In particular, care needs to be taken in using a realistic discount rate in calculating NPW to allow a fair comparison of alternatives.

The potential pole relocation costs listed with the Beltline route reflect a coordinated effort of WisDOT and ATC representatives to create a “best guess” of which poles would be impacted by future WisDOT Beltline projects and the extent of those impacts. The time frame associated with the affected poles was also considered. The following documents the potential number of poles needing relocation that relates to the costs in the first table:

- 146 total poles would be placed on the Beltline corridor
- 61 poles have 0% risk of being relocated (42%)
- 85 poles have a varying level of risk of being relocated (58%)
- Of the poles that would potentially be relocated
 - 30 poles have a 100% chance of being moved (21% of total poles)
 - 31 poles have a 50% chance of being moved (21% of total poles)
 - 24 poles have a 20% chance of being moved (16% of total poles)

There are many costs not listed in the table in which WisDOT feels need to be considered to effectively compare ATC's route alternatives. Some of these costs are incurred by the public primarily due to motorist delay and safety impacts associated with higher crash rates, which are attributable to work zone congestion and additional R/W encroachments. These public costs are substantially higher along ATC's North Route than the other routes given the relatively high traffic volumes on the Beltline. The following list summarizes these unaccounted costs:

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- Initial facility construction:
 - Additional construction time needed due to shorter work-time opportunities should WisDOT require nighttime work (more labor and machinery hours required)
 - Higher labor rates and mobilization should WisDOT require nighttime work. WisDOT estimates that these costs could increase by as much as 10%¹
 - Additional crash barriers
- Additional crash barriers:
 - Maintenance and repair (includes routine maintenance and those repairs not recoverable from motorist insurance)
 - Crashes (motorists have more chances to hit the barriers if more are installed)
 - Snow removal (if WisDOT must use specialized equipment to remove snow from the Beltline shoulder because it is unable to effectively plow it over the barriers)
- Motorist delay for:
 - Any construction option (whether aboveground or underground)
 - Crashes (due to the greater likelihood of the additional crash barriers being hit)
 - ATC facility maintenance
- Additional ATC facility maintenance due to:
 - WisDOT requiring work during off-peak times such as evenings, overnight, or early Sunday morning (includes the additional cost of overtime labor)
 - Special access needed from the freeway or ramp shoulder (includes work zone traffic control signs, devices, portable message boards, etc.)
- Future design and construction costs to WisDOT for Beltline operational improvements, which would be borne by ATC, for designing around ATC's facility:
 - If DNR does not grant ATC a permit to use the marsh area in the South Towne Drive to USH 51 (Stoughton Road) area and ATC has to locate on WisDOT R/W
 - If WisDOT is physically constrained by both ATC's facility and not being able to secure additional R/W through the Todd Drive to Rimrock Road area.
 - If ATC has to build underground and WisDOT has to design and construct around ATC's facility, which in all probability would not be relocated

7. Use of Interstate 39/90

ATC's proposed North Route also uses Interstate 39/90 from the Beltline to just northwest of CTH W. WisDOT does not have any serious concerns about this segment at this time.

8. Conclusion

The proposed use of the Madison Beltline for the proposed ATC transmission facility (in conjunction with its Dane County Reliability Project) has numerous challenges throughout the length of the corridor.

¹ Estimate based upon WisDOT's costs for 2006 Beltline/Todd Drive interchange project in Madison.

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In the first segment, USH 14 (Middleton) to USH 18/151 (Verona Road), WisDOT feels these impacts can be minimized to accommodate the needs of both ATC and the future operation and expansion of the highway.

The second segment between USH 18/151 (Verona Road) and South Towne Drive presents the greatest challenges. Although ATC's facility could be accommodated on the Beltline today, it is almost certain that the highway will need future operational improvements in the form of mainline expansion, interchange improvements, and collector-distributor road construction and improvements. The latter is likely needed to maximize capacity and minimize congestion by reducing short trips between closely spaced interchanges.

All of this will be extremely costly. If ATC's facility interferes with Beltline operational improvements, the additional costs of having to move or design around the facility will be borne by ATC (if on WisDOT R/W) or WisDOT (if ATC is outside WisDOT R/W). In either case, it is the public who bears the cost whether through gas taxes and vehicle registration fees or energy bills. There are other costs related to motorist delay, possible relocation of businesses, additional crashworthy devices needed, etc. that must be included. All of these costs and factors must be evaluated by the PSC to determine if it is practical and feasible for use of this segment of the Beltline.

The third segment from South Towne Drive to Interstate 39/90 is similar to the first segment as far as being able to address and minimize WisDOT concerns. The biggest concern would be access to and construction in the marsh and going over the Yahara River, and the DNR would have to approve any permits needed for that operation.

If the second segment cannot be used, the third segment would likely have to be ruled out as well. This is based upon ATC's proposed routes showing a possible hybrid north/middle route that uses the first segment on the Beltline, Verona Road, a few local roads, and then existing ATC R/W. It does not appear practical to attempt to get back to South Towne Drive after leaving the Beltline at Verona Road due to the proximity of ATC's existing R/W.

9. WisDOT Contacts

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