

Representative Mark Pocan  
Assembly District 78  
Wisconsin State Legislature  
Madison, Wisconsin

Dear Representative Pocan:

Congratulations on passing the biennial budget, and to the Democratic party officials for bringing railcar manufacturing jobs to Wisconsin in your contract with Talgo. Wisconsin is showing great leadership in the development of new regional rail service as part of the Midwest High Speed Rail Initiative.

On July 2, I emailed to your office a PDF outlining a concept for locating Madison's new Amtrak station entitled "Yahara Station." Today, July 20, I meet with your chief of staff to discuss this concept. I understand that it is current policy to support WisDOT's recommendation that the new Madison station be located at the Dane County airport, and that this policy was first developed in the 2000 "Milwaukee-Madison Passenger Rail Corridor Study," written by consultants at HNTB Corporation. I followed that process and the subsequent resolution by the City of Madison to pursue a two-station strategy: one at the airport for trains connecting to St. Paul, and a downtown station for trains terminating in Madison.

At the time, I felt that Madison officials were failing to consider the potential of the station located on Pennsylvania Avenue, which was rated by the study as a close second to the airport in its final tabulation based on a set of criteria. In fact, the Pennsylvania Avenue station rated higher than the airport for, what I consider, crucial criteria: pedestrian and bicycle access, access to bus routes, and redevelopment opportunities calling it the "Best opportunity" of any of the sites studied, including Monona Terrace or the Milwaukee Road (Kohl Center) station locations in the downtown.

In terms of the Environmental Assessment completed in 2004, the Pennsylvania Avenue and airport stations have nearly identical evaluations, because the train would operate on the same mainline track. However, it should be noted that the EA stops short of the airport property, deferring to the environmental report for planned airport reconstruction, which is now complete. The EA and supporting letters from the DNR and other jurisdictions note the presence of wetlands at the airport, which would be impacted by station construction.

The new concept for a Yahara Station is in some ways a variation of the Pennsylvania Avenue site, and many of the evaluation criteria used in the 2000 study and the 2004 EA would be very similar for the Yahara Station site, which is directly to the north of Burr Jones Field, and bounded by E. Johnson St., First St., E. Washington Ave., and the Yahara River. Yet, there are also important differences and advantages to be gained by considering this site over the Pennsylvania Ave. site: It has much better visibility on major arterials, most importantly E. Washington, better pedestrian and bicycle access, and more redevelopment opportunities. While 'Penn Station' was rated higher than the airport on these criteria, its location is constrained by the WSOR railyard directly west, by the lack of connecting streets, and potential for new development in this industrial area.

Before considering a direct comparison between the airport and Yahara Station, it may be useful to consider the original basis for the consultant's recommendation of the airport. The following excerpt from the report shows which criteria were decisive, and which were not factors in the

recommendation. Underlines are added for emphasis; my comments are added in brackets and italics.

**Except from 2000 "Milwaukee-Madison Passenger Rail Corridor Study" with comment.**

**9.0 CONSULTANT'S RECOMMENDATION**

Based on the evaluation of the criteria, Alternative 3 [*airport*] ranks the highest with a score of 130, followed by Alternative 4 [*Pennsylvania Ave.*] with a score of 123. Alternative 2 ranked third, with a score of 120; Alternative 1 ranked fourth, with a score of 106, and Alternative 5, the Kohl Center Alignment, scored the least points, with a score of 93.

The top two alternatives (Alternatives 3 and 4) use the same 1st Street. alignment but use different station locations. Thus, the differential in points is attributable to the station location. The airport location gets its higher score for the following reasons: it will not require land acquisition for parking or require business relocations; it has a low capital implementation cost and can be implemented easily; it's close to the airport and can share available services; the synergistic effect of having both passenger rail and the airport passengers in the same location will assure support of the best passenger services, and it has a good chance of any of the alternatives in developing into a multi-modal facility.

*[Note that the main reason for recommending the airport is there is no need to acquire land from private owners or relocate businesses, which was required for the 'Penn Station.' Yet, as we all know, WisDOT routinely, constantly, and with much persistence acquires land for highways and expressways, including perhaps hundreds of acres to expand I-94 between Milwaukee and Chicago. Why is acquiring two or three (the report is unclear) small properties and relocating one business such an impediment to locating a major transportation facility?*

*In regard to the idea of the airport being a good place for a multimodal facility, its is on the very edge of north Madison, with only a single access road, and one bus route. The potential for transfers from train to plane, or visa versa, are very low; probably no more than a handful of transfers a day, and some days no transfers at all. Will Amtrak riders from Watertown or Oconomowoc or Brookfield (the only stations between Milwaukee and Madison) look to ride the train to catch a flight out of Dane County airport? Perhaps a few from Watertown, but the other two cities are more likely to look to Mitchell Field. Future riders from Tomah, or Wisconsin Dells, or Portage may choose Dane County. The most important mode for accessing a train is by walking, followed by taxi, bike, or bus. Accessing the train by flying to it should not be considered a priority, or what most planners would consider as a needed part of a multimodal transfer facility.]*

The consultant, therefore, has selected Alternative 3 as its recommendation for the following reasons.

Land for the proposed station site is currently available and in use as an airport overflow parking facility. The site can be very easily modified to facilitate rail parking and passenger drop off. **This is important as the project is following a tight implementation schedule.** The amount of parking available will allow for parking demand variations without the need to purchase and develop new land, as would be the case with other locations. Parkers will pay a fee to the airport covering parking costs. Discussions with the Director of the Dane County Regional Airport indicate that this can be achieved.

*[Perhaps this is the most telling statement regarding the consultant's recommendation: WisDOT's tight schedule for implementation. Apparently the idea was to have Amtrak up and operating in Madison by 2004. Well it is now 2009, and service might not start for at least three more years; and yet, the public is being told the same thing: The airport is the best location because WisDOT is in a hurry and other sites might require some action by other jurisdictions, specifically the City of Madison. In the intervening nine years, the City of Madison failed to produce any report or study of its own regarding where the City would like to locate its Amtrak station. Instead, the tug of war between the airport and downtown remained, lax rope to be sure, and now a general agreement to not start that struggle again with federal funds on the line.*

*Also note that WisDOT places high value on having enough parking, and discounts other important modes for accessing the station, which in another location would reduce the need for so many private vehicles to be parked at the station. If the only way to get to the station is by car, then the station needs lots of parking; an implied circular argument, which shows a lack of interest in the current environmental crisis over carbon pollution.]*

In addition to land needed for parking, the airport site location would require land for the terminal. The plan calls for extending and widening the existing bus waiting area to accommodate rail passengers. The needed land is available and would be leased at an estimated \$.50 per square foot per year. This lease cost will be considerably less expensive than purchasing land at the Penn Station location, the next best site. Again, this site is currently available and could be modified within the timeline for implementation. Business relocations will be required at the Penn Station site and could delay the project.

The capital cost for the airport station area is the least expensive of the alternatives. Developing this site will not require a city and/or county financial contribution as is likely at the other station sites, since it is within the \$2 million projected budget. A local contribution needed for other stations may be difficult to obtain and could delay implementation of the project. A \$3,000 annual lease costs is anticipated for the space needed for the terminal at the airport.

The airport station is in close proximity to airport terminal amenities such as a restaurant, rental cars, and taxi services. While these amenities may be provided at other stations they are assured at the airport station. Adding both rail and air passengers in one location insures that good support services will be provided. It is also more likely that a dedicated shuttle to down Madison and the University would be provided with both rail and air passengers located in the same area.

*[Much is made about sharing facilities with the airport, which seems to be focused mainly on rental cars. I have ridden Amtrak dozens of times to a variety of destinations, and I have never once felt the need to rent a car. Other facilities at the airport, such as food and toilets will in fact be quite a distance from the train platform, indeed the station would be about 600 feet, or two blocks, from the airport terminal entrance, and many more steps from available food service and shops, many of which are now behind airport security requiring a boarding pass.*

*In fact, an urban location within the context of the city will provide much better opportunities for train patrons to find food or other services. As for taxis, a train station will attract taxis because of the assured fares, there is no reason to rate the airport higher than any other site on this account.*

*The last point about the potential for a shuttle, or express bus, is repeated often. Indeed, the study seems to imply in a number of ways that the new train station would support the airport, most importantly with this shuttle bus. Yet, if there is a demand for an airport express, why does Madison Metro not provide one*

*now? This line of argument is continued in regard to potential 'commuter rail' service to the airport from the proposed Dane County rail project.]*

The close proximity to the airport will provide Amtrak with an opportunity to create an interlining agreement with an airline carrier. This agreement could be worth hundreds of thousands of dollars annually.

*[The study talks about this interlining agreement with Amtrak, but my understanding is that none of the airlines currently serving Dane County airport participate in this type of agreement with Amtrak. Generating additional revenue for Amtrak, unrelated to train service for our region should not be a factor in station location analysis.]*

Amtrak's long distance train service, the Empire Builder, will be able to use the airport station. Bringing this service to Madison should be a high priority.

*[It seems unlikely that the Empire Builder would need to come to Madison. With the new service, few to no passengers would board the Empire Builder to go east. Transfers at Watertown would allow riders from out west to get to Madison in less than half an hour.]*

This is the only proposed site that is closely linked to another major travel mode and thus sets the stage for a truly multi-modal terminal in Dane County.

*[This statement is just wrong, and one has to ask WisDOT what they mean by "major travel mode." The study is clear that other locations have much better access to Madison Metro bus routes. Walking and biking have to be considered major travel modes. Multimodal facilities are focused on local and intercity bus services, and transfer between rail and bus modes; not on transfers between planes and trains.]*

### **Recognized problems with the recommended airport station site**

Recent articles in *The Capital Times*, including the July 18th edition story on the Talgo purchase, and *Milwaukee Journal Sentinel* reiterate the State's policy to place the station at the airport, and yet, the articles always point out the problems with accessing the airport, and suggest future steps for fixing this problem, including an express bus to downtown, perhaps the proposed Dane County commuter rail going to the airport, and a second station in the downtown. **I believe that these concerns and ideas point out the main problem: The Dane County airport is not a good site for an intercity train station.** I do not believe that Madison should have two Amtrak stations (Chicago has one Amtrak station), because of the costs, confusion, and defusing of the potential economic development that this train station brings.

### **Federal Railroad Administration guidelines for station development and high speed rail applications.**

In a document entitled "Railroad Corridor Transportation Plans, A Guidance Manual from 2005, the Federal Railroad Administration stated the following about station locations for high speed rail service:

"Each city should have a station located in or near the central business district. This is mandatory for larger Metropolitan Statistical Areas (MSAs), with metropolitan populations of 150,000 or more, since to do otherwise would undermine the inherent advantages of rail passenger systems. Central locations are highly desirable, if at all possible, for smaller cities as well. This center city station should have direct access to local transit systems (bus, rail, taxi, etc.) as well as appropriate amounts of parking for private cars" (p.3).

Each station track configuration should provide for the through movement of trains along the corridor without having to reverse the train's direction at any time. Through stations are almost always preferable to stub-end terminals, both at the endpoints and intermediate points in a corridor" (p. 4).

In the first case, locating Madison's Amtrak station at the Dane County airport does not meet the guideline for being "in or near the central business district." While potential station locations at Monona Terrace or the Kohl Center would require the train to reverse direction from a stub-end terminal, violating the second guideline. At 1.5 miles from the capitol, Yahara Station is in or near the CBD, and it would be a "through station" on mainline track, and would not require the train to reverse direction. While state and local officials, and WisDOT, insist that Madison's application should stick with the airport to avoid any controversy that would put the application at risk, it is clear that the airport location does not meet FRA guidelines. Indeed, this insistence on a location that does not work puts the application at risk.

The June 23, 2009 Federal Register includes a Program Notice describing how applications for high speed rail funding will be evaluated. Pertinent language to the Madison station issue includes the following:

"5.1.1.1 Transportation Benefits

- Encouragement of intermodal integration through provision of direct, efficient transfers among intercity transportation and local transit networks at train stations, including connections at airports, bus terminals, subway stations, ferry ports, and other modes of transportation. . . ."

On this criteria, WisDOT's application allows a transfer to the airport and planes from the train. There is one (1) Madison Metro bus route that goes to the airport and it currently requires a transfer at the north transfer point from downtown buses. There is no access from pedestrian or bike modes. Yahara Station has access to 14 bus routes, five on E. Johnson and nine on E. Washington. No transfers are required from downtown. Yahara Station is connected to bike trails along the river, a bike route on Mifflin St., and the Isthmus Bike Trail to downtown via the river trail. High density, urban neighborhoods surround Yahara Station providing good access for pedestrians.

"5.1.1.3 Other Public Benefits

Each application will be assessed based on its demonstration of the proposed project's potential to achieve other public benefits in a cost-effective manner. Factors to be considered in assigning a rating will include the contribution the proposed project would

make to:

- Promoting livable communities, including integration with existing high density, livable development (e.g., central business districts with public transportation, pedestrian, and bicycle distribution networks, and incorporation of transit-oriented development).

On this criteria of livable communities, an honest evaluation would have to give WisDOT's application a zero. There is no connection to high-density land use, no connection to the pedestrian and bike network, and no potential for transit-oriented development.

### **Yahara Station and the EA and FONSI reports**

The EA's FONSI (page 6) states that: "It should be noted that while the EA evaluated initial station locations, local communities may choose an alternative station site when the project is implemented. Alternative station sites would be subject to NEPA review. If local communities select the station site identified in the EA, then the EA would be reevaluated for those sites."

Recent statements from Madison officials claiming that the EA only covers the airport station seem to be incorrect. Even a casual reading of the EA shows that it had the same finding of no significant impact for the Monona Terrace and Pennsylvania Ave. stations. In addition, the section above clearly states that it is up to the local community to select a station site, and that, even if the local community selects the location recommended by WisDOT, a "reevaluation" of the site in terms of NEPA will be performed.

I am asking you and the State of Wisconsin to consider another option, which I have promoted to Madison and Dane County officials and staff under the name Yahara Station. The Yahara Station PDF is best viewed on-screen, in 'full screen' mode. The PDF slides show how a new siding can be located next to the mainline track at Burr Jones Field, how a platform and depot can be constructed, and the potential for significant redevelopment and infill, which has the potential to generate new property taxes, within an existing TIF district, that could be used to fund depot development, a multimodal bus hub, and structured parking.

Yahara Station is on the same, existing mainline track as evaluated for the airport and Pennsylvania Ave. stations. If the addition of the siding track and platform avoid taking any parkland from Burr Jones Field, then the EA's finding of no significant impacts also hold for Yahara Station. The existing railroad property seems wide enough to accommodate a siding and platform south of the existing track; however, creating tangent track, and a cross-platform transfer to a Dane train station, *may* require taking a small amount of parkland, perhaps only a few hundred square feet, depending on the site design. (Please see attached parcel map analysis.) Required reconstruction of the mainline track for the overall project provides an opportunity to move the existing track further north in the 100 foot railroad right of way, thereby creating enough space to build the siding track and platform for Yahara Station without taking any parkland.

The following issues would need to be evaluated for Yahara Station *only if* it took any parkland for the train station:

1. Section 4(f)

Federal transportation projects that take parkland are evaluated under Section 4(f). The law states that federal project managers must get permission from the local jurisdiction to take any parkland. The Madison City Council would be responsible for approving or disallowing the taking.

2. Section 6(f)

A check of online records shows no evidence of federal funds being used to develop Burr Jones Field as a park, therefore, there are no Section 6(f) impacts.

3. Deed restriction on Burr Jones Field property.

City of Madison staff claim that the deed for Burr Jones Field includes a deed restriction limiting use of Burr Jones Field property to park uses. WisDOT and the City of Madison could undertake an eminent domain taking of the affected property at Burr Jones for this important transportation project. Such a taking is within the legal rights of the state, in this case to clear the deed of property that the City already owns from claims of the prior property owners, who City staff indicate no longer live in the city or Wisconsin.

4. City of Madison Ordinance, Sec. 8.35 PRESERVATION OF SHORELINE PARKS.

Taking land from Burr Jones Field may trigger the 'Shoreland preservation ordinance' requiring a public referendum on the project. Actually, I helped draft that ordinance, which was a step taken specifically in regard to stopping the City from locating a public swimming pool in Olin-Turville Park. I believe the only project halted by that ordinance was the swimming pool at Olin-Turville. The recent vote on Garver Feed passed with a huge majority in favor of the project. I certainly believe that Yahara Station would also win a huge majority of support, especially over the alternative of the putting our Amtrak station at the airport.

5. Historic or Cultural Resources

The Yahara River Parkway was designated a historic landmark by the City of Madison in 1995. Burr Jones Field may be part of that designation. The City Council controls any restrictions that the landmark designation may entail, and has final say on any changes to the park.

I have worked on New Starts application for commuter rail and environmental impact statements for light rail projects in the Twin Cities. I believe that the language I have provided above is about the level of detail needed in an addendum to the EA to move Yahara Station forward for consideration by federal officials. I also believe that any taking from the park would be a very small amount of land, perhaps necessary to deliver the best station design, and that this taking would not change the finding of no significant impact.

I suggest that the impacts to wetlands in the Cherokee Marsh at the airport, as pointed out by the DNR and the Dane County RPC in the comments in the EA, are bigger than the potential impacts at Burr Jones Field, which are not wetlands, and all or nearly all of Yahara Station would be on existing railroad property. Additional EA work on the airport site will have to include mitigation of wetland loss.

## Advantages of Yahara Station over the Dane County airport

The Yahara Station concept offers many advantages over the airport which are summarized in the table below:

Evaluation of Access Modes		
	Yahara Station	Dane County Airport Station
Pedestrian access	Yes. Good access from surrounding streets, including walking distance to Tenney-Lapham, Emerson, and Williamson neighborhoods, and Schenks Corners.	None. Lack of consistent sidewalks, International Drive is the only access street, and Cherokee Marsh precludes access from all four directions.
Bicycle access	Yes. Excellent access via the Yahara River trail, connecting to the East Isthmus Trail. Designated bike route on Mifflin St. and bike lanes on E. Washington.	Very difficult, no trails or designate bike routes. No street grid connections.
Taxi service	Easy access to capitol square on E. Washington with low fares for the 1.6 mile trip, to the UW on E.. Johnson /Gorham, and with low fares.	Taxi stand at airport, but 5.6 miles from the capitol square causing typical fares over \$12.
Bus access	Madison Metro operates 14 routes on E. Johnson (5) and E. Washington (9) that have existing stops near First St.	Madison Metro operates one (1) bus route to the DCRA, and that bus (#20) requires a transfer from all downtown buses at the North Transfer Point to proceed to the DCRA.
Drop off by private vehicle	Good connections to the street network make drop offs relatively easy for most patrons	The location on the extreme north side requires extra travel for drop offs or pick ups from the train station, for most patrons.
Park and ride	Need for parking spaces would be low than at DCRA due to good access by other modes. Potential for private vehicle parking in the immediate vicinity. Development of Yahara Station would begin with relocation of City Fleet Services and creation of surface parking on that site. Private investment would include a parking structure for shared use.	Yes. Existing, overflow parking is available at DCRA. The lack of access via pedestrian, bicycle, or bus will require a large parking lot for most Amtrak patrons.



Evaluation of Travel Time and Impacts on the Transportation System		
	Yahara Station	Dane County Airport Station
Travel Time	Yahara Station is 3.5 miles closer to the capitol square than DCRA. Trip time will be longer on board the train coming from Milwaukee, and travel time back to First St. will be added to each trip once off the train.	DCRA is 3.5 miles further distant from the capitol square than Yahara Station and will require all train riders to retrace the distance from the airport back to First St. once they exit the train.
Congestion	Yahara Station is located between two of the city's most trafficed arterials, E. Washington and E. Johnson. Capacity exists, especially on E. Washington to handle a surge of traffic when train arrive.	The DCRA is accessed only via International Drive and Packers Avenue. Locating the train station at the airport is likely to add to congestion at the airport, including vehicles that mistakenly enter the airport terminal area.
Connection to future light rail	Cross-platform transfer to Dane County rail is part of the design, which utilizes close proximity between the Amtrak platform and an existing freight railroad corridor and bridge over the Yahara River. Travel times on the light rail would be shorter than a trip from the airport.	A siding track will need to be built at the airport station to allow for easy transfers to the proposed Dane County diesel light rail. If this siding is not constructed at the time of the Amtrak station, then the station will need to be reconfigured when the Dane train is funded. A center platform between the mainline and siding track, with a pedestrian underpass, will be needed to transfer to the local train.

Evaluation of Economic Development Potential in terms of Redevelopment and Infill		
	Yahara Station	Dane County Airport Station
Redevelopment Potential	<p>Very high. Yahara Station has the potential to act as a catalyst for major redevelopment on the east isthmus, and supports the goals of the Capitol Gateway Corridor Plan. The City Fleet Services site would become a prime redevelopment opportunity. The Fiore Center strip mall at the corner of First St. and E. Washington could be redeveloped as a major mixed-use node, with office, commercial, and residential space adjacent to regional rail service with one hour service to downtown Milwaukee and 2.5 hour service to Chicago's Loop.</p> <p>Other property on E. Washington would also become valuable redevelopment sites within a five to ten minute walk of the regional train station.</p>	None.
Infill potential	<p>Very high. There are a number of sites with infill development potential within the half-mile walk circle of Yahara Station, including on E. Washington, E. Mifflin, and in the Schneks' Corners area.</p>	<p>Little to none. The DCRA is located within the bigger Cherokee Marsh, which is not suitable for development. In addition, strict building height limits are enforced within three miles of the airport.</p>
Potential for private investment in depot development and existing TIF districts	<p>The City Fleet Services site could be sold to private investors and the revenue used to develop a high quality train depot. Most of the properties shown in the Yahara Station concept plan are within an existing TIF district which could be used to share the costs of structured parking with private developers.</p>	None.

Evaluation of Costs		
	Yahara Station	Dane County Airport Station
Track reconstruction	<p>If the project stops at Yahara Station, this first phase project will not require reconstruction of the additional 3.5 miles to the DCRA.</p> <p>Addition of siding track has a cost.</p>	<p>Includes the cost of the additional 3.5 miles of track reconstruction. The second phase project to St. Paul, MN would still require this track work so any savings are temporary only.</p> <p>If no siding track is added then no transfer to the future Dane train are possible.</p>
Station development	<p>WisDOT costs for the platform will be the same at Yahara Station. Parking costs may initially be higher, but private investment in parking lots may also lower costs to the public.</p> <p>Cost of developing a real multimodal facility, including a first rate train depot could be paid for through an agreement with private investors and TIF.</p>	<p>Poor soils at DCRA may increase the cost of platform construction, including costs of wetland mitigation.</p> <p>No private investment is likely in the station development. Madison will not have a train depot, only a platform with a canopy, shelter, and parking lot.</p>

The rest of my case in favor of Yahara Station is provided in the Yahara Station PDF file. A group has formed, as an initiative of the Dane Alliance for Rational Transportation to be called the Campaign for Yahara Station. DART's website at [www.rationaltransportation.org](http://www.rationaltransportation.org) will provide information on the Yahara Station proposal, including additional analysis, station rendering, and promotional events undertaken by the Campaign for Yahara Station.

We welcome any opportunity to meet with you and other State of Wisconsin officials and staff.

Thank you for your time.

Sincerely,



Barry Gore