



MAYOR'S OFFICE

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January 14, 2013

Mr. Jason Lynch, P.E.
WisDOT, SE Transportation Region
P.O. Box 798
Waukesha, WI 53187-0798

Re: Comments on the alternatives presented for the I-94 East-West Freeway Corridor Study on December 5 and 6, 2012

Dear Mr. Lynch:

The City of West Allis would like to offer the following comments on the alternatives presented for the I-94 East-West Freeway Corridor Study. The City is concerned about the loss of capacity with the closure of four existing freeway ramps and the implications this action will have on environmental justice for our residents and businesses. And while the Braided Ramps Alternative comes the closest to restoring the capacity currently available for motorists accessing locations in the City of West Allis (since it provides direct access to the Eastbound and Westbound mainline freeway at both 68th Street/70th Street and Hawley Road); the City is not in support of the double decker freeway configuration used in this alternative.

Closure of South 68th Street and Hawley Road Ramps

We realize that WisDOT prefers to use the word "consolidation" in regards to the potential closures of the:

- 1.) 68th Street Eastbound On Ramp (7,900 vehicles per day),
- 2.) 68th Street Westbound Off Ramp (6,800 vehicles per day),
- 3.) Hawley Road Westbound On Ramp (5,400 vehicles per day),
- 4.) Hawley Road Eastbound Off Ramp (4,100 vehicles per day),

And while access will still be provided to 70th Street, 68th Street and 60th Street through the use of frontage roads or collector/distributor roads, the existing capacity provided by the eight (8) existing on and off ramps will be cut in half under three of the proposed alternatives (excluding the Braided Ramps Alternative). Whereas there were formerly four on ramps Eastbound and Westbound between 70th Street and 60th Street providing a theoretical capacity of 6,400 vehicles per hour, there will only be two on ramps in the future providing a theoretical capacity of 3,200 vehicles per hour. Likewise where there were formerly four off ramps between 70th Street and 60th Street, there will only be two off ramps in the future.

According to traffic counts currently available on I-94, there is a substantial volume of vehicles that would be funneled onto the one remaining on-ramp in each direction and the one remaining off-ramp in each direction:

1. 70th Street Westbound On Ramp (5,400 + 5,500 = **10,900** vehicles per day)
2. 70th Street Eastbound Off Ramp (5,100 + 4,100 = **9,200** vehicles per day)
3. Hawley Road Eastbound On Ramp (4,500 + 7,900 = **12,400** vehicles per day)
4. Hawley Road Westbound Off Ramp (6,800 + 3,100 = **9,900** vehicles per day)

The volumes expected on the Hawley Road Eastbound On Ramp would be higher than almost anywhere else on I-94 with the exception of the congested on ramps at CTH F and Moorland Road (CTH O) in Waukesha County which currently carry 13,500 to 13,800 vehicles per day. So the City has valid concerns that the closure of these ramps will lead to significant delays for our residents and business owners on the remaining consolidated ramps.

In addition, it appears that under most alternatives being evaluated for the Stadium Interchange, motorists would need to exit the mainline freeway somewhere within the Stadium Interchange itself. In other words motorists trying to reach 70th Street from the east would need to make a decision to exit the mainline freeway up to 1.8 miles east of 70th Street in the vicinity of 41st Street. Likewise, motorists attempting to access the Eastbound freeway mainline would be routed through an underground tunnel for up to 1.8 miles before seeing daylight and merging onto the mainline freeway itself. This will be confusing for motorists who are not expecting such an early decision point. The City understands that there are multiple cemeteries constricting the freeway in this vicinity. But we would ask that consideration be given instead to relocating some of the graves with appropriate dignity, as was done to make way for the existing freeway in the 1960's. We would hope that a double decker freeway could be avoided if the graves were relocated.

Environmental Justice

These ramp closures and the continuation of ramp metering at the remaining ramps also needs to be addressed in light of the substantial number of low income neighborhoods and minority populations living in this area of West Allis. The east half of the City has a minority race population of 6,755 persons which represents 23% of the total population. In addition there are 4,976 households earning low to moderate income which represents 40% of the total households in this area. In fact the two census tracts closest to the I-94 ramps in question have a minority population of 43% with 20% of families living below poverty levels.

Of particular concern is the potential for a distribution of benefits to suburban groups at the expense of urban dwellers in West Allis. The closure of these four ramps and the ramp metering already instituted at the remaining ramps will be advantageous for longer trips on the freeway system (at the expense of the shorter trips). Residents in West Allis who live closer to Milwaukee will be subject to the delays from the ramp closures, signalized frontage roads and ramp metering, and will not receive immediate access to the freeway. While suburban commuters who live outside of the metered zone will receive all of the benefits without any of the ramp delays.

The City is requesting an analysis of how these proposed ramp closures will affect the City's minority and low income populations so as to avoid disproportionately high and adverse impacts to these groups. The City is also questioning whether the affected low income and minority populations were given a fair opportunity to provide input into the public process since many have complained to us that they were not notified. The public involvement activities may need to be adapted in our community to encourage more

local participation and increase attendance through hand delivered notices and a closer venue for the meeting.

Future Development and Job Creation

The City also still has plans for additional development at the former Allis Chalmers factory site (Summit Place Redevelopment) which has experienced a significant amount of new development already. The Traffic Impact Analysis recently prepared for this site expected an additional 2,825 employees and 185,000 square feet of new retail space in the next few years. This is expected to generate an additional 15,780 new daily trips to the site in coming years with 1,050 new vehicles arriving in the am peak hour and 1,200 new vehicles exiting in the pm peak hour. These 15,780 new trips on top of the projected congestion from 9,200 to 12,400 vehicles per day using each of the remaining consolidated ramps will certainly cause delays at these proposed ramps. The close proximity of freeway access is obviously one of the key selling points to prospective employers and the City appears in danger of losing this selling point.

The City can be expected to offer other comments and concerns as this project continues through design and construction. Thank you for your consideration of our comments and for taking the opportunity to discuss the I-94 East-West Freeway Corridor Study with us.

Sincerely,



Dan Devine,
Mayor