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Dobrogniewa (Dobra) S. Payant, P.E.
WisDOT SE Region
I-94 East-West Study Team
141 NW Barstow Street
Waukesha, WI 53187-0798

RE: Section 2 Updated Version, "Alternatives Considered", I-94 East-West Corridor Study
Draft EIS

Dear Ms. Payant:

The City of West Allis would like to offer the following comments on the updated version of Section 2, "Alternatives Considered", for the I-94 East-West Corridor Study Draft EIS. As the City has stated before in our January 14, 2013 letter, we are still concerned about the potential closure of all four existing freeway ramps at Hawley Road and the resultant loss of access and loss of capacity and diversion of traffic to local streets. Access to the freeway provides abundant opportunities for economic development by allowing trade and commerce to occur. Conversely, the removal of this access will have serious implications on environmental justice for our minority residents attempting to reach employment elsewhere and on businesses attempting to engage in commerce elsewhere. This issue of access to I-94 has dramatically escalated in recent weeks with the Johnson Controls announcement of 800 new jobs being created at the Renaissance Faire building on 60th Street. The close proximity of freeway access is obviously one of the key selling points to prospective employers like Johnson Controls and the City appears in danger of losing this selling point, thereby potentially reversing the creation of these new jobs.

Closure of Hawley Road Ramps

According to traffic counts currently available for I-94, the Hawley Road interchange accommodates 16,000 existing vehicles per day:

- 1.) Hawley Road Westbound On Ramp (5,200 vehicles per day),
- 2.) Hawley Road Eastbound Off Ramp (4,000 vehicles per day),
- 3.) Hawley Road Westbound Off Ramp (2,800 vehicles per day),
- 4.) Hawley Road Eastbound On Ramp (4,000 vehicles per day),

The updated version of Section 2 in the Draft EIS states the following:

“Residents and businesses that use the Hawley Road interchange have expressed concern about the additional time and indirection that would be caused by removing the Hawley Road interchange. The next closest interchange would be the 68th Street/70th Street interchange, about 8 blocks west of Hawley Road.”

But the updated report does not address the repercussions of this “indirection” which undoubtedly would cause the diversion of traffic onto local streets if the Hawley Road ramps were to be closed. The most obvious direct route to access the remaining ramps at 68th/70th Street from the south (in West Allis) would be on Main Street in the City of Milwaukee. Main Street is just a 30 foot wide local street which would be woefully inadequate in width and thickness to accommodate the thousands of additional vehicles per day seeking an alternate route to the remaining ramps on I-94.

By using traffic counts currently available for I-94, it can be demonstrated that the remaining ramps at 68th/70th Street would be overwhelmed by the substantial volume of vehicles that would now be funneled there if the Hawley Road ramps were closed:

1. 70th Street Westbound On Ramp ($6,000 + 5,200 = \mathbf{11,200}$ vehicles per day)
2. 70th Street Eastbound Off Ramp ($5,300 + 4,000 = \mathbf{9,300}$ vehicles per day)
3. 68th Street Westbound Off Ramp ($6,800 + 2,800 = \mathbf{9,600}$ vehicles per day),
4. 68th Street Eastbound On Ramp ($7,300 + 4,000 = \mathbf{11,300}$ vehicles per day),

The 41,400 vehicles per day expected to use these remaining ramps at 68th/70th Street would be higher than almost anywhere else on I-94, so the City has valid concerns that the closure of the Hawley Road ramps will lead to significant congestion and delays for our residents and business owners trying to use the only remaining ramps at 68th/70th Street.

Future Development and Job Creation

Several companies have recently announced their plans to create new jobs at the former Allis-Chalmers factory site in West Allis. 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, thereby potentially reversing the creation of these new jobs.

Wisconsin's largest company, Glendale-based Johnson Controls Inc., plans to lease a newly renovated building at Renaissance Faire, 801 S. 60th Street, bringing 800 new jobs to that site. Johnson Controls plans to begin operating later this year at the Renaissance Faire building, leasing about 143,000 square feet. Van Buren Management Inc., which operates the Renaissance Faire building, also plans to begin construction this month on a new parking structure, with about 600 spaces to help accommodate Johnson Controls' new employees. These anticipated employees and their vehicles will translate into about 1,800 new trips per day to this site.

It is important to note that Johnson Controls' headquarters are at 5757 N. Green Bay Ave. in Glendale. Johnson Controls also has employees in downtown Milwaukee at 507 E. Michigan Street. The company has about 3,200 employees in southeastern Wisconsin overall and is the largest public firm in Wisconsin. So the majority of business trips to and from Johnson Controls' new facility in West Allis will be oriented to and from the east where the majority of other Johnson Controls employees work. Therefore, WisDOT's proposal to restore the Hawley Road ramps to and from the west with a half interchange will not significantly benefit Johnson Controls or the other employers located at the Renaissance Faire building.

The Renaissance Faire building is part of the former Allis-Chalmers Corporation complex and has 361,000 square feet of office space, including newly renovated space totaling 179,000 square feet. It also has a 24,000-square-foot Blast Fitness center. Tenants in the main building also include U.S. Bank (70,000 square feet of space), Wheaton Franciscan Healthcare (45,000 square feet) and WDJT-TV CBS Channel 58 (30,000 square feet of space) and now Johnson Controls as well. Wheaton Franciscan Healthcare is another company that only just recently decided to move about 280 office workers to the Renaissance Faire building in West Allis after signing a 45,000-square-foot lease.

Brookdale Senior Living Inc. also recently launched a \$3.9 million expansion at its corporate support center in the former Allis-Chalmers Corporation complex (at 6737 W. Washington St. in the Summit Place office park). The company now has more than 400 employees and plans to add about 200 new jobs soon. Governor Scott Walker spoke of this new development as "good news for Wisconsin as well as the entire metro Milwaukee area." Governor Walker went on to say "This is yet another national company that looked at all of its options, and decided to stay and grow in Wisconsin because of the strong business climate and outstanding workforce."

As stated previously, the close proximity of freeway access is one of the key selling points to all these prospective employers such as Brookdale or Wheaton or Johnson Controls or CBS Channel 58 or US Bank. In particular, CBS Channel 58 has always been adamant that it needs to get TV crews onto the freeway in either direction as soon as possible to cover stories. A half interchange would definitely not meet their needs and would almost certainly lead to their immediate relocation elsewhere.

And the City still has plans for even more development at the former Allis-Chalmers Corporation factory site. The Traffic Impact Analysis prepared for this site expected a total of 2,825 new employees and 185,000 square feet of new retail space in the next few years. This is expected to generate a total of 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 41,400 vehicles per day using the only remaining ramps at 68th/70th Street will certainly cause delays at these remaining ramps. In fact, the analysis forecasted an additional 4,280 vehicles per day just from the Renaissance Faire building alone on 60th Street. This will add over 400 vehicles to the Hawley Road I-94 off ramps in the morning peak hour and almost 500 vehicles to the Hawley Road I-94 on ramps in

the evening peak hour. It is imperative that the Hawley Road I-94 ramps remain open now that these new jobs are already being added at this location.

Environmental Justice

The potential ramp closures at Hawley Road 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 7,211 persons which represents 25% of the total population. In addition, there are 5,247 households earning low to moderate income which represents 41% of the total households in this area.

In fact, the two census tracts closest to the Hawley Road ramps have a combined minority population of 42%, with 23% of families living below poverty levels in census tract 1001 and 22% of families living below poverty in census tract 1002. These statistics are based on the 2008-2012 American Community Survey. It is important to note in this Survey that many Hispanics and Latinos likely self-classify themselves as white in race statistics. But a closer look at the "ethnicity by race" table in this Survey, instead of the "race" table typically used by WisDOT, shows 1,610 non-white residents (42%) living in census tract 1001 and 1,716 non-white residents (41%) living in census tract 1002.

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 and ramp metering, and will not receive immediate access to the freeway. Conversely, suburban commuters who live outside of the metered zone will receive all of the benefits of the freeway system 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 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