

January 25, 2022

Secretary Craig Thompson
Wisconsin Department of Transportation
Southeast Region
141 NW Barstow St.
P.O. Box 798
Waukesha, WI 53187-0798

Dear Secretary Thompson,

On behalf of 18 organizations, we are writing with concerns that WisDOT's planned I-94 expansion in Milwaukee fails to meet the needs of the nearby community and **WisDOT has not proposed any meaningful alternative to address our concerns.** We appreciate that WisDOT is preparing a Supplemental Environmental Impact Statement to ensure that the proposed I-94 EW expansion be conducted with new data, some additional public input, and that it aligns with federal environmental and racial equity priorities. However, WisDOT has not proposed an alternative that meets the needs of the community, including a permanent transit component for the project, and aligns with the guidance [issued by FHWA](#) for spending transportation funds provided under the Bipartisan Infrastructure Law. The two alternatives proposed by WisDOT are nearly identical and fail to address key concerns about paved surfaces, transit options, and cost.

The public deserves meaningful alternatives. Our Fix-at-Six option recommends fixing the safety and operational concerns of the corridor and, rather than expanding the footprint of the interstate, invests in more pressing transportation needs such as road repair and transit expansion. We respectfully request an alternative that responds to the community and the practical solutions proposed in Fix-at-Six.

Cost

Our organizations remain concerned about the dramatic increase in cost for the six-lane expansion, which WisDOT [previously estimated to cost \\$800-\\$850 million](#). In the name of transparency, we request a breakdown of the increase and how much of the cost is coming from the enormous, one-size-fits-all Stadium Interchange. WisDOT should provide alternatives for this interchange including some that have gone through a value engineering process. Given WisDOT's commitment to [innovative interchange design](#), the public should have the opportunity to weigh-in on a variety of interchange options.

In a legitimate public engagement process, the public would be able to comment on a variety of choices. Instead, the public has been given two nearly identical projects. This has created a false dilemma, where WisDOT has excluded viable alternatives. We would like to see a six-lane alternative that minimizes new asphalt and right of way while maximizing safety and operation concerns. How much, for instance, would it cost to replace the existing interchange in-kind versus building the proposed interchange? What would a middle ground look like? Until more alternatives of various sizes and costs are legitimately explored and transparently shared with the public, our organizations will remain opposed to the project.

Environmental Impacts and Transit

Our organizations still support fixing the operational and safety concerns of the road, but we are concerned that the current six- and eight-lane proposals essentially use the same amount of pavement, which means that all options will have roughly the same impact of increased stormwater runoff and pollution draining into adjacent waterways. At a time when wet weather events are increasingly volatile and severe, the public deserves to see alternatives that prioritize green infrastructure, flood management and climate resiliency over excessive amounts of pavement and increasing the highway's footprint.

WisDOT has an obligation to consider a permanent transit component as part of this project. Transportation-related carbon emissions are Wisconsin's second largest contributor to climate change. WisDOT should be exploring every opportunity to reduce emissions and vehicle miles traveled (VMT), including transit expansion. Additionally, the residents of the affected community are more likely to rely on public transit, less likely to commute outside the city, and thus benefit from the freeway less than their white counterparts. Despite this, none of the options currently provided consider a meaningful, permanent transit component as part of this project. WisDOT should expand the scope to include transit alternatives and an option for turning the Stadium Freeway into a boulevard.

A New Era of Sustainable, Equitable Transportation for Wisconsin

In your announcement of the SEIS process in April, you stated that this process "will also help us make certain that our efforts to ensure racial equity with this project are comprehensive and aligned with federal priorities." President Biden has charged agencies with advancing environmental justice and confronting the climate crisis. Specifically, the administration has a goal of 40% of benefits of a given infrastructure project going toward disadvantaged communities.

The I-94 project is an opportunity for WisDOT to get aligned with the leadership the Biden Administration has demonstrated on recognizing the impacts of highway expansions on Communities of Color and climate change. Indeed, highway construction has a long history of dividing and harming communities of color and I-94 is no exception. The proposed expansion would cut through a majority-minority community in the only majority-minority city in the state. This would only worsen the extreme segregation and inequities of Milwaukee, which were caused in large part by the original construction of I-94 and I-43. These inequities include [health impacts associated with traffic pollution exposure](#), such as higher rates of asthma, cardiovascular disease, impaired lung development in children, pre-term and low-birthweight infants, childhood leukemia, and premature death. WisDOT's current options fail to address any of these concerns, meet President Biden's goals, or advance environmental justice in any way.

We are entering a new era of federal leadership and decision makers across the country are taking a step back to reconsider how we invest in and plan transportation for the future. In Wisconsin, it is clear that there is a better solution for the I-94 corridor in Milwaukee than just expanding the highway. The Fix at Six solution is not only feasible, it is also better for Milwaukee neighborhoods and for the climate.

We urge you to provide the public with a 6-lane alternative that has a much smaller footprint than the current options, and that includes more transit, as well as walking and biking options. Please respond as soon as possible to Cheryl Nenn by email at cheryl_nenn@milwaukeeiverkeeper.org or mail at Milwaukee Riverkeeper, 600 E. Greenfield Ave, Milwaukee, WI 53204.

Sincerely,

Deb Nemeth, Executive Director, 1000 Friends of Wisconsin

Terry Wiggins, Steering Committee Member, 350.org of Milwaukee

Karyn Rotker, Senior Staff Attorney, and Chris Donahoe, Staff Attorney, ACLU of Wisconsin

Devin Anderson, Membership and Coalition Manager, African American Roundtable

Mark Quam, President, Chippewa Valley Transit Alliance

Gary Crevier, President, ESTHER

John Gardner and Leland Pan, Friends of Valley Park

Dennis M. Grzezinski, Attorney, Law Office of Dennis M. Grzezinski

Tony Wilkin Gibart, Executive Director, Midwest Environmental Advocates

Rev. Joseph Jackson Jr., President, MICAH

Cheryl Nenn, Riverkeeper, Milwaukee Riverkeeper

Caressa Givens, Milwaukee Safe and Healthy Streets

Elizabeth Ward, Chapter Director, Sierra Club - Wisconsin Chapter

Megan Severson, State Director, Wisconsin Environment

David Liners, State Director, WISDOM

Rabbi Bonnie Margulis, Executive Director, Wisconsin Faith Voices for Justice

Abby Novinska-Lois, Executive Director, Wisconsin Health Professionals for Climate Action

Matt Casale, Environment Campaigns Director, WISPIRG