



March 29, 2021

Mr. Pete Buttigieg  
Secretary of Transportation  
United States Department of Transportation  
1200 New Jersey Ave, SE  
Washington, DC 20590

Dear Secretary Buttigieg,

We are among the many businesses and organizations that rely on the I-94 East-West Corridor between 70th Street and 16th Street, and we represent contractors and thousands of union members who are ready to get to work rebuilding the almost 60-year-old corridor. **We urge you to support the timely reevaluation of the Environmental Impact Statement (EIS) and the reinstatement of the Record of Decision (ROD) for the I-94 East-West reconstruction and expansion project in Milwaukee, Wisconsin.**

The East-West Corridor is the gateway for the products and venues that make Southeast Wisconsin and our state vibrant and healthy. Nearly 21,000 businesses and 310,000 jobs are located within a 5-mile radius of the corridor's center. There are countless others in the metro Milwaukee area and around the state who also depend on the I-94 East-West Corridor for the safe transit of their employees, customers, and products. Seventeen million tons of freight valued at \$25 billion travel through the corridor annually, coming from or heading to every corner of Wisconsin and across the nation. Millions travel this vitally important corridor each year to visit Summerfest, the Brewers, the Bucks, the State Fair, and downtown Milwaukee.

Improving the East-West Corridor is necessary to realize the benefits of the \$2.4 billion state and federal investment in the Marquette and Zoo interchanges. Commuters and businesses cannot take full advantage of these interchanges' utility unless the roadway between them is equally efficient and safe.

For these reasons and others, we support reconstructing, modernizing, and adding capacity to the crucial I-94 East-West Corridor. The improved freeway will benefit the Milwaukee area and the entire state.

As you review this project, please consider the following:

**I-94 East-West is One of the Most Congested, Unreliable, and Dangerous Corridors in the State.**

This critical roadway is at a tipping point as its age and ongoing deterioration create significant congestion, safety, and economic development challenges. The East-West carries between 140,000 and 160,000 vehicles per day – 30,000 more than its 1950s-era design intended. Left-side ramps, narrow shoulders, short weaving distances, and other outdated features fail to provide safe operating conditions for today's cars, buses, and large trucks. The average crash rate is two to three times higher than the statewide urban freeway average and, at some points, more than four times higher.

Where Wisconsin has reconstructed, modernized, and expanded sections of the Southeast Freeway System, crash rates have been reduced by up to 48%.

Chronic congestion and unreliability have led many motorists to depend on local roads more and more. According to a Wisconsin Department of Transportation (WisDOT) performance measure, before the pandemic, a large portion of the corridor was unreliable not only during peak periods but throughout the day with a planning time index (PTI) of more than 1.7.

A modernized and expanded corridor would reduce emissions and benefit regional air quality by relieving congestion, improving traffic operations, lessening delays from crashes, and increasing travel speeds.

**The Corridor Needs to be Reconstructed.**

The East-West Corridor has been resurfaced numerous times during its life, most recently in 2011-12. But at this point, it's a Band-Aid approach that would result in a continual cycle of costly patches – such as another resurfacing (estimated at \$40 million-plus). These short-term “fixes” would lead to years of lane closures and increased traffic diversions onto local roads while doing nothing to solve the underlying safety, capacity, and traffic-handling problems.

WisDOT looked closely at the resurfacing option and had this to say: “In general, each highway resurfacing has a shorter life span than the previous resurfacing because the original pavement, still in place after 50 years, provides a less effective base as the concrete continues to crack and deteriorate...Based on WisDOT's experience with other highways, resurfacing the study area freeway system again would not be cost effective.”

Thirty-six of the 38 bridges (overpasses) in the corridor are original to the Interstate, dating back to the 1960s. In its 2021-23 budget submittal, WisDOT stated, “The age of these bridges is concerning and can lead to load postings, safety issues and operational issues.”

**The Freeway and Transit are an Integral Part of Wisconsin's Transportation System.**

The I-94 East-West project and transit are complementary, and both are important to increasing safety, reducing congestion, and promoting economic development in the region.

Transit is a critical component of an effective regional transportation system – it is just not an “either-or” proposition. The Southeastern Wisconsin Regional Planning Commission (SEWRPC) determined that even if transit offerings were to double, it would not be enough to address traffic congestion on the East-West Corridor effectively.

The solution is a robust transit element in conjunction with required capacity and safety improvements to the freeway. Improved transit service cannot be achieved by forgoing I-94 East-West modernization and expansion, as the project’s funds are not transferable to other transportation programs like public transportation or local roads.

### **The Project Benefits the City of Milwaukee and Its Residents, Including Low-Income Residents.**

While the corridor is an important link between Milwaukee and Waukesha counties, well over half of freeway traffic between 16th and 70th streets enters or leaves the freeway during rush hour within the congested 3.5-mile segment. Corridor users include veterans and military personnel heading to the VA hospital, workers at some of the area’s largest employers, fans heading to American Family Field and other attractions, and more.

Additionally, Southeastern Wisconsin Regional Planning Commission’s Vision 2050 noted that planned expansion of Southeast Wisconsin freeways would directly serve areas of minority and low-income populations. As a result, minority and low-income populations residing adjacent to the modernized I-94 East-West Corridor would benefit from the expected improvement in accessibility to employment. Based on 2012 project data, about 81 percent of all workers and 79 percent of the minority population in the I-94 East-West Corridor drive alone or carpool to work.

Communities in and around the area will benefit from a neighborhood-sensitive design that avoids nearby homes, businesses, and cemeteries and reduced traffic diversions onto their local streets as travelers choose the improved I-94 for their trips.

### **Traffic is Returning to the Corridor.**

In the weeks following the “safer at home” order, traffic volumes on the I-94 East-West Corridor fell about 45-50%. However, the latest information shows that corridor traffic is within 10-15% of 2019 levels despite the continuing pandemic.

Without additional capacity, WisDOT estimates that a 25% reduction in pre-pandemic traffic volumes with no projected growth in traffic volumes over the project’s design life (2050) is required to maintain an acceptable level of service.

As more Wisconsinites are vaccinated and life becomes increasingly normal, it is reasonable to expect traffic on this corridor will grow. Reconstructing this corridor without additional capacity will likely result in a newly constructed freeway that immediately operates several hours each day with severe congestion and unsafe conditions.

**Conclusion: It is Time to Move Forward.**

Further postponing this project pushes the project's benefits into the future and increases costs.

The I-94 East-West project cost is estimated at \$1 billion-plus. Eighty-five to ninety percent of this cost is related to pavement and bridge replacement and design and safety improvements. Only 10%-15% is due to the additional lane.

As we continue debate on this project, costs will grow by millions, with initial estimates pegging a two-year delay at \$44-\$60 million due to inflation alone.

Please support jobs, safety, and economic development with a timely reevaluation of the EIS and reinstatement of the Record of Decision for the I-94 East-West project.

Sincerely,

AAA Wisconsin	Midwest Food Products Association
Association of Equipment Manufacturers	Molson Coors
Association of Wisconsin Tourism Attractions	Potawatomi Hotel and Casino
Building Advantage	Transportation Development Association
Commercial Association of REALTORS® Wisconsin	United Community Center
Greater Milwaukee Association of REALTORS®	Waukesha County Business Alliance
Hispanic Collaborative	Wisconsin Agri-Business Association
International Union of Operating Engineers Local 139	Wisconsin Building Trades Council
Ironworkers Local 8	Wisconsin Economic Development Association
Marquette University	Wisconsin Laborers' District Council
Menomonee Valley Partners	Wisconsin Manufacturers & Commerce
Metropolitan Milwaukee Association of Commerce	Wisconsin Transportation Builders Association
NAIOP	
Near West Side Partners	
North Central States Regional Council of Carpenters	

CC:

Charles Small, USDOT Deputy Assistant Secretary for Intergovernmental Affairs  
William Rasky, USDOT Special Assistant for Governmental Affairs  
Stephanie Pollack, FHWA Deputy Administrator  
Latoya Hines, Staff Assistant to the FHWA Administrator  
Maggie Gau, Chief of Staff to Gov. Evers  
Barb Worcester, Deputy Chief of Staff to Gov. Evers  
Craig Thompson, WisDOT Secretary  
Joel Nilsestuen, WisDOT Assistant Deputy Secretary