



Department of Public Works

Jeffrey J. Mantes
Commissioner of Public Works

Preston D. Cole
Director of Operations

April 1, 2011

Mr. Bill Mohr
Wisconsin Department of Transportation
Southeast Transportation Region
141 NW Barstow St.
Waukesha, WI 53187

Subject: Zoo Interchange Corridor Study
Supplemental Draft Environmental Impact Statement

Dear Mr. Mohr:

The City of Milwaukee Department of Public Works (DPW) has reviewed the Supplemental Draft Environmental Impact Statement (SDEIS) for the Zoo Interchange Project dated February 4, 2011.

First, we would like to commend the WISDOT team for considering the public input received during the public comment period associated with the original Draft Environmental Impact Statement (DEIS) dated May 2009 and developing additional alternatives that attempt to address the concerns expressed by stakeholders. Reducing the size, impacts and costs of the modernization alternatives included in the DEIS while providing safety improvements and adequate traffic operations was clearly desired by stakeholders and it appears that the WISDOT team has largely succeeded in accomplishing this goal with the development of the Reduced Impact Alternative.

While the Reduced Impact Alternative represents a vast improvement over the modernization alternatives included in the original DEIS, we do have some specific comments and concerns as follows:

Right-of-Way Impacts

While the Reduced Impact Alternative does, in fact, significantly reduce real estate acquisitions compared with the more extensive modernization alternatives, the Reduced Impact Alternative does require acquisition of an 8 unit apartment building located in the east leg of the interchange in the City of Milwaukee. The original DEIS included an alternative referred to as the E-1 alternative that employed a "Texas T" configuration that provided necessary geometric improvements to address existing safety issues and maintained access while providing for

adequate traffic operations without requiring residential building displacements. As such, the E-1 alternative was supported by the City of Milwaukee DPW. According to the SDEIS, the Reduced Impact Alternative eliminated the Texas T configuration in lieu of a standard diamond interchange at S. 76th Street to reduce right-of-way acquisition and avoid a 14% traffic diversion from S. 84th Street to S. 76th St. However, the Reduced Impact Alternative appears to require more right-of-way acquisition, particularly along the north side of I-94 between S. 84th Street and the core including acquisition of the 8 unit apartment building, compared to the E-1 alternative. It is recognized that the E-1 alternative would require marginally more right-of-way acquisition at State Fair Park compared to the Reduced Impact Alternative, however, this land is currently vacant and used for surface parking.

It is further noted that noise levels associated with the E-1 alternative would be similar or lower compared to existing conditions for residential neighborhoods along the east leg of the interchange while the Reduced Impact Alternative would exhibit significant noise increases.

To avoid acquisition of the 8 unit apartment building and minimize noise impacts to adjacent residential neighborhoods in the City of Milwaukee, DPW requests that WISDOT evaluate the potential for the E-1 alternative in the east leg to be integrated into the Reduced Impact Alternative or, alternatively, that the Reduced Impact Alternative be redesigned as necessary to avoid acquisition of the 8 unit apartment building as noted below.

Capacity Expansion

It is noted that the Reduced Impact Alternative does marginally increase capacity in the east leg through the transition area between the core and the existing freeway cross section east of 70th Street while maintaining existing capacity in the east-west direction through the core. However, while the text of the SDEIS indicates that "full 8 to 12 foot shoulders on all ramps and freeways" will be provided in the Reduced Impact Alternative, the concept plans show accommodations for future capacity expansion in the east-west corridor through the provision of what appears to be 18 foot shoulders that could be converted to general purpose travel lanes.

Please be aware freeway expansion in the east-west corridor through the City of Milwaukee would result in dramatic adverse impacts to adjacent neighborhoods and/or impacts to the property tax base. As such, Milwaukee Common Council Resolution 011729 expressly opposes freeway capacity expansion between the Marquette Interchange and the Zoo Interchange with the City of Milwaukee.

Given the City of Milwaukee's opposition to future freeway expansion in the east-west corridor, that traffic volumes in the east leg of the Zoo Interchange are not expected to increase during the plan period, the potential to avoid the acquisition of an 8 unit apartment building with reconstruction of the Zoo Interchange, and reduced noise impacts, it is strongly requested that WISDOT eliminate the future capacity expansion accommodation in the east leg.

Furthermore, while the Reduced Impact Alternative maintains existing through capacity in the east-west direction, it is our understanding that the 18 foot shoulders are designed such that they could be easily restriped to provide an additional 12 foot general purpose lane and 6 foot shoulder in each direction with Federal Highway Administration approval through the issuance of an Exception to Standards for substandard shoulder width. Please be aware we would consider such a proposal to be a significant new alternative and a departure from the alternatives included in the current SDEIS and the previous DEIS. The City of Milwaukee remains opposed to additional capacity and would demand that any proposal to convert the 18 foot shoulders to 12 foot general purpose lanes be subject to a full NEPA review and comprehensive public input.

Noise Barriers

While a redesign of the Reduced Impact Alternative to reduce the 18 foot shoulders through the core necessary to accommodate future capacity expansion in the east-west corridor would be expected to significantly reduce noise impacts to adjacent residential neighborhoods, the Reduced Impact Alternative, as currently designed, is expected to result in significant noise impacts to residential neighborhoods along the east leg of the interchange in the City of Milwaukee. According to the SDEIS, noise barriers are only justified along the south side of I-94 between S.84th Street and the core. We request that WISDOT incorporate construction of these noise barriers, based on public input, into the Zoo Interchange project.

However, residential neighborhoods along the north side of I-94 between the project terminus east of 76th Street and the core will also experience noise impacts. Virtually all residences adjacent to the freeway in this area will experience increased noise levels compared to existing conditions that will exceed the 67 dBA threshold for the consideration of noise barriers. It is requested that WISDOT incorporate construction of noise barriers, based on public input, into the Zoo Interchange project in this location as well.

Hank Aaron State Trail

Please be aware that the Wisconsin DNR and their partners will be proceeding with installation of a crushed limestone surface on the Hank Aaron State Trail (HAST) West Allis extension this summer. However, it is noted that the trail corridor has been identified as a potential contractor staging area during reconstruction of the Zoo Interchange. It is requested that WISDOT develop and maintain an effective detour route between 94th Pl. and the Oak Leaf Trail in Underwood Creek Parkway for the duration of the Zoo Interchange reconstruction project. Furthermore, it is requested that WISDOT take action to restore the crushed stone surface within the corridor upon completion of the Zoo Interchange reconstruction project to allow the DNR to provide a permanent asphalt surface when the corridor becomes available.

Furthermore, it is recommended that the Zoo Interchange reconstruction project incorporate a direct connection between the HAST West Allis Extension and the Milwaukee County Zoo through preservation of an existing tunnel or provision of a new tunnel under I-94.

Transit Accommodations

While we support the reconstruction and modernization of the Zoo Interchange, we continue to urge that the WISDOT take a more comprehensive and balanced approach to providing regional transportation infrastructure in the southeastern Wisconsin region. In our letter dated August 10, 2009 providing our review of the original Zoo Interchange DEIS, we urged WISDOT to consider transit options in conjunction with the Zoo Interchange design. In response, WISDOT indicated that "the legislature has charged local governments and RTA's, not WISDOT, with the responsibility for implementing new or expanded transit systems like commuter rail or express bus systems."

However, currently proposed State legislation (2011 Senate Bill 25), if passed, would eliminate the formation of RTA's leaving no other options for the provision of intercity transit service. We continue to believe that WISDOT's core function is to provide comprehensive intercity transportation services that include both highway and transit options and continue to request that WISDOT take a more proactive role in the development of intercity rapid and express transit service in the region.

It is noted that the design for the Reduced Impact Alternative preserves the east-west CP Rail corridor located to the south of the interchange for the Hank Aaron State Trail and a potential future transit corridor. However, DPW would reiterate our request that WISDOT evaluate the potential to incorporate a future north-south transit corridor connecting the CP Rail corridor with major trip generators to the north including the Milwaukee County Zoo, Regional Medical Center, and Milwaukee County Research Park. There may be opportunities to provide such a corridor in conjunction with the HAST tunnel connection to the Milwaukee County Zoo, in conjunction with improvements in the UP railroad corridor being performed with the Zoo Interchange which include extending the rail tunnel under Hwy 100/ Blue Mound Road, replacing the railroad bridges over I94, USH 45, and potentially North Ave. and replacing the I894/USH 45 bridge over the UP railroad, or in conjunction with improvements to Hwy 100.

Traffic Mitigation


While a traffic mitigation plan has not been developed, we look forward to working with the WISDOT in the development of a traffic mitigation plan to maintain mobility during reconstruction of the Zoo Interchange. We would request that WISDOT consider restoring the extension of AMTRAK Hiawatha service between Milwaukee and Watertown that was successfully implemented during the 1997-98 east-west freeway resurfacing project.

Local Road Design


1. It would be desirable to provide direct access to traffic coming from the Medical Center to N. 95th St. at Wisconsin Ave. as opposed to the current access to W. Wisconsin Ave. at N. 94th St. as shown in the Reduced Impact Alternative. This should be feasible due to the elimination of the NB on-ramp to I-45 from Wisconsin Ave. Direct access to N. 95th St. would eliminate two turning movements for traffic exiting the Medical Center and possibly allow the reopening of a median cut at Wisconsin and 94th St. to allow residential traffic from the neighborhood to the south to fully access W. Wisconsin Ave.
2. With the Reduced Impact Alternative, westbound traffic on Blue Mound Road is not able to enter southbound USH 45 and then turn onto westbound I-94 as they can today. This will increase the amount of westbound traffic on Blue Mound west of USH 45. This will also increase the amount of westbound left turning traffic at Blue Mound Road and Mayfair Road (Hwy 100) since the next on-ramp to westbound I-94 is at Hwy. 100. To avoid this increase in traffic on westbound Blue Mound Road and added traffic at the already congested Blue Mound and Mayfair intersection, it would be desirable to provide the ability for westbound traffic on Blue Mound Road to access westbound I-94 from the southbound on-ramp to 45. This might eliminate the need to build the westbound triple left turn lane at Mayfair Road and W. Blue Mound Road.
3. It appears that the plans show a single northbound left turn lane at the intersection of W. O'Connor St. and S. 84th St. and no look ahead left turn lane to add additional vehicle storage. With the westbound on-ramp to I-94 now allowing full legal access to westbound I-94, northbound USH 45 and southbound I-894 under this alternative, we are concerned that a single left turn lane may not be able to provide an acceptable level of service and queuing capacity. The proposed new intersection geometry creates offset alignment between the northbound left turn and southbound through movements and will probably require that the northbound left turn movement be operated as a protected only turn movement. This would exacerbate our concern with the ability of the single northbound left turn lane to accommodate future traffic demand. The City would request that we be provided an intersection analysis using future year conditions to verify that a single left turn lane is functional.
4. Although the north leg of the intersection of West Blue Mound Road and North Glenview Avenue is in the City of Wauwatosa, the City of Milwaukee operates the traffic signals at this intersection. This alternative does not provide for a separate southbound left turn lane. To make the signal at this critical intersection operate more efficiently, it is important that this separate left turn lane be provided. We believe that a painted left turn lane could be provided without a median island to minimize any right of way that might be needed. We would request that this be evaluated. If the installation of such a left turn lane is not feasible, the City would request that we be provided an intersection analysis using future year conditions to verify proper operation without the separate left turn lane.

The city appreciates the presentation provided at the March 8, 2011 Common Council Public Works Committee by the WISDOT team and the opportunity to review in detail the SDEIS as well as the opportunity to attend the Public Hearings held on March 22nd and 23^{Road}. However, we are advised that the Council desires to provide a formal position on the SDEIS. As the file heard on March 8 was a communication file, it has no further status. It is not possible within the legislative calendar to have the Council take action prior to the April 4th deadline for comments. As such we are requesting that the comment period to be extended to allow for this input. The next council meeting is April 12th at which a file could be introduced and with adoption anticipated on May 3^{Road}. As such, we are requesting that the formal comment period be extended to May 6th, 2011 to allow the full execution of the file.

Very Truly Yours,



Jeffrey S. Polenske, P.E.
City Engineer



Jeffrey J. Mantes
Commissioner of Public Works

JJM:JSP:ejg

C: Mayor Tom Barrett
Alderman Willie L. Hines, Jr.
Alderman Michael J. Murphy
Alderman Robert Bauman
File