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ICYMI: Coalition files comments on I-94 East-West Corridor Project

Racial justice, environmentalist, land use, civil rights, faith and neighborhood advocates oppose WISDOT's proposed alternatives

MILWAUKEE - On Tuesday, January 31, a coalition of 32 organizations and individuals submitted public comments in opposition to the Wisconsin Department of Transportation (WISDOT)'s proposed alternatives identified in the Draft Supplemental Environmental Impact Statement (DSEIS).

The comments found that WISDOT is not complying with Title IV or environmental justice procedures, and that WISDOT is moving forward with an alternative with the knowledge that it will have a discriminatory effect. They additionally argue that the purpose and need statement is not reasonable and is designed to lead inexorably to expansion of the highway by eliminating consideration of other reasonable alternatives, that WISDOT wrongly failed to develop a transit-inclusive reasonable alternative, and that the DEIS fails to adequately consider effects of the project.

The comments from the coalition expand on much of what was shared during the public hearings, in which 67% of the verbal comments opposed WISDOT's alternatives and called for a "[Fix at Six](#)" solution, and only 14.5% of commenters called for the 8-lane alternative.

In response to the DSEIS, coalition members shared the following:

"This highway needs to be rebuilt -- without more lanes and without another giant interchange that would gobble up around 40 more acres of land in Milwaukee that could be used for far better purposes. The draft environmental impact statement shows that WisDOT's 8-lane alternative will not achieve its congestion reduction goal -- it will simply encourage more drivers to take more trips that will lead to similar rush hour congestion. It will not reduce crashes -- it will increase fatal crashes, increase serious injury crashes, and lead to more crashes overall. More traffic lanes and more cars on the road will lead to more air pollution, more water pollution, and more flooding. WisDOT's expansion plan is the last thing that Milwaukee needs," said **Environmental Attorney Dennis Grzezinski, one of the attorneys who prepared the comments.**

"The very logic used to justify this expansion is flawed," said **Gregg May, Transportation Policy Director at 1000 Friends of Wisconsin.** "A thorough review of WisDOT's model shows that traffic counts along the I-94 corridor have remained stagnant for decades. If Milwaukee wants to meaningfully address congestion and improve equity outcomes, WisDOT must also be

investing in bus rapid transit (BRT) along 27th Street and National Avenue. This would be consistent with SEWRPC's VISION 2050 plan which recommends permanent transit solutions along with highway improvements to improve congestion."

"WISDOT's analysis of the I-94 project does not grapple with, or seek to mitigate, the looming threat of climate change. Additionally, its air quality analysis is lacking," said **Victoria Gillet, MD, Conservation Chair of the Sierra Club - Great Waters Group**. "These may seem like abstract critiques of a document, but the impacts are very, very real. Adding highway capacity will make air quality worse. I am a primary care physician who practices close to the proposed expansion. The evidence is clear that decreased air quality will worsen lung disease and dementia symptoms and increase the number of heart attacks, strokes, and preterm birth in our community. Expanding I-94 will literally make it more difficult for me to treat my patients. It will also exacerbate climate change which is the greatest threat to human health in our lifetime. My patients deserve better"

"Instead of moving forward with their selected 8-lane expansion that WisDOT knows will have discriminatory impacts on Black and Hispanic residents, the agency should fairly develop and analyze a transit-inclusive alternative that repairs or reconstructs the highway and makes prioritized safety improvements, without adding lanes or significantly enlarging the concrete footprint, but that does greatly expand public transportation services," said **Christine Donahoe, Staff Attorney at the ACLU of Wisconsin**.

"Racial equity is a special concern for MICAH, and it is what we find missing in the WISDOT proposed eight-lane expansion," said **Joyce Ellwanger, a member of Milwaukee Innerscity Congregations Allied for Hope (MICAH)**. "We support FixAtSix because it ensures that the needs of all citizens are addressed, whether they own a car or not, and advances bus rapid transit as a means of connecting people to jobs."

"The SEIS minimizes the direct, indirect, and cumulative negative effects of the proposed highway expansion, in combination with other recent interchange expansions like the Zoo and Marquette Interchanges, on water quality, flood risk, and air quality for local communities that bear the brunt of pollution, said **Cheryl Nenn of Milwaukee Riverkeeper**. "It also fails to offer any meaningful details as to the scope and nature of mitigation for environmental impacts, or how these impacts could be avoided or lessened by including permanent transit as part of a reasonable alternative and maintaining the existing highway footprint."

"The climate emissions and health disparities caused by an interstate expansion will persist for decades, while any minimal benefits are only afforded to wealthier commuters, and diminish rapidly," said **Abby Novinska-Lois, Executive Director of Wisconsin Health Professionals for Climate Action**. "Instead, the funds from this \$1.25 billion project could be better invested in alternative modes of transportation like public transit and bike infrastructure that improve well-being. Wisconsin children deserve a future with fewer emergency room trips for asthma, mental health challenges, and heart attacks. Right now, WisDOT has a chance to build that better future. But expanding interstate infrastructure does the exact opposite and will only serve

to amplify the suffering of neighborhoods already harmed by air and noise pollution in Milwaukee."

Comments were submitted by 32 signatories, including such organizations as:

- **1000 Friends of Wisconsin**
- **350.org Milwaukee**
- **ACLU of Wisconsin**
- **African American Roundtable**
- **Amalgamated Transit Union**
- **Black Leaders Organizing for Communities (BLOC)**
- **Clean Wisconsin**
- **Community Huddle**
- **Faith in Place**
- **Friends of Valley Park**
- **Greening Greater Racine**
- **Hummingbird MKE**
- **MICAH (Milwaukee Innercity Congregations Allied for Hope)**
- **Midwest Environmental Advocates**
- **Milwaukee Riverkeeper**
- **Sierra Club - Great Waters Group**
- **Sierra Club - Wisconsin Chapter**
- **Walnut Way Conservation Corp.**
- **Wisconsin Bicycle Federation**
- **Wisconsin Conservation Voters**
- **Wisconsin Faith Voices for Justice**
- **Wisconsin Health Professionals for Climate Action**

This coalition of organizations will continue to advocate for a solution that best serves Milwaukee and the whole of Wisconsin.

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The [Coalition for More Responsible Transportation \(CMRT\)](#) is composed of faith-based, public interest, social justice, public health, environmental and transportation advocacy groups, as well as of hundreds of concerned citizens from Milwaukee and beyond. CMRT is calling for more responsible, cost-effective transportation spending that better meets local needs, including a focus on accessible, efficient, affordable public transit, and complete walking and biking infrastructure.