
**I-94 East-West Corridor Study
Supplemental Draft EIS
Supporting Documentation – Volume 4 of 4**



Supporting Documentation Contents

Volume 4 of 4

VOLUME 4 of 4 – 2016 Final EIS Documentation

I-94 East-West Corridor Visual Impact Assessment

Revised FHWA Assessment of Adverse Effects for the I-94 East-West Corridor Project from 16th Street to 70th Street, Milwaukee, WI

Addendum Assessment of Adverse Effects Determination for the I-94 East-West Corridor Project from 16th Street to 70th Street, Milwaukee, WI

Programmatic Agreement among Federal Highway Administration, Wisconsin State Historic Preservation Officer, and Advisory Council on Historic Preservation Regarding Wisconsin Department of Transportation Project ID #1060-27-00 WHS #13-0065



I-94 East-West Corridor Study Visual Impact Assessment

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1 Introduction

This visual impact assessment (VIA) technical memorandum presents the results of an assessment of the visual impacts of the proposed alternatives to the I-94 East-West Corridor Study in Milwaukee County, Wisconsin. The impacts of the alternatives on visual resources noted in the environmental impact statement (EIS) are summarized. The VIA provides a description of the existing visual conditions of the parts of the study area that would be affected by project alternatives and discusses how the project alternatives would change existing visual conditions. The assessment of the changes was prepared using the Federal Highway Administration (FHWA) visual assessment methodology, which has been successfully applied by FHWA and state highway departments, as well as by other visual resource specialists, to evaluate countless transportation and other projects. The methodology provides a way to quantitatively rate and compare changes in visual quality and provides decision makers with a way to compare alternatives. Please see the glossary at the end of this memorandum for definitions of the terms used to assess visual impacts.

2 Project Description

FHWA and the Wisconsin Department of Transportation (WisDOT) are preparing an EIS for the I-94 East-West Corridor Study in Milwaukee County (see Exhibit 1). The study area includes approximately 3.5 miles of I-94 from 70th Street (west limit) to 16th Street (east limit). The study area includes five service interchanges on I-94 (68th/70th Street split diamond, Hawley Road, Mitchell Boulevard, 35th Street, and 25th/26th/28th Street). It also includes the Stadium Interchange at I-94, US 41, and Miller Park Way, and the northbound and southbound approaches to this interchange.

The termini for this study generally match the termini for the following two previously completed studies of the southeast Wisconsin freeway system: the Zoo Interchange study located west of the I-94 East-West Corridor study area and the Marquette Interchange study located to the east. The east terminus of the Zoo Interchange study serves as the west terminus for the I-94 East-West Corridor study (70th Street). The west terminus of the Marquette Interchange study was 25th Street. In June 2013 WisDOT and FHWA determined that the east terminus for the I-94 East-West Corridor study area would be extended further to the east to accommodate alternatives that would tie back into I-94 near 16th Street, rather than 25th Street. The transition area between the reconstructed west segment of the Marquette Interchange and existing I-94 generally included 16th Street to 25th Street.

The freeway system in the study area provides a critical interstate link for commerce, tourism, and commuters in the southeast region of Wisconsin and the Milwaukee Metropolitan area. Due to high traffic volumes and outdated freeway mainline and interchange design, this portion of I-94 has a crash rate that is significantly higher than the statewide average crash rate for similar facilities. Improvements are being proposed to accommodate existing and future traffic demand, improve traffic flow and operations, and to address safety concerns.

The 2035 Regional Transportation System Plan (Planning Report No. 49, Southeastern Wisconsin Regional Planning Commission, June 2006) recommends widening and/or other improvements to provide additional capacity in the I-94 corridor through Milwaukee County. In November 2011, under Wisconsin's legislative process for major highway projects, the Transportation Projects Commission approved moving ahead with the environmental study phase for this project so it can be considered for future funding enumeration.

The I-94 East-West Corridor Study EIS, will discuss project purpose and need, alternatives considered (including a no-build alternative), the affected environment, environmental consequences of the proposed action, mitigation, and the results of coordination with agencies and the public. The EIS will also demonstrate compliance with applicable environmental laws and regulations and will be made available for public review.

3 Methodology

3.1 FHWA Methodology and Guidance

The FHWA visual quality assessment methodology and guidance used in this technical memorandum are documented in the FHWA publication *Visual Impact Assessment for Highway Projects* (FHWA 1988). The method has been successfully applied by the FHWA and state highway departments, as well as by other visual resource specialists, to evaluate the visual impacts of numerous transportation and other projects. FHWA's methodology is the

standard approach for evaluating the aesthetic effects of transportation projects. FHWA developed this assessment method in response to National Environmental Policy Act (NEPA) requirements that project proponents assess the effects of proposed federal actions or projects on the quality of the human environment, including effects on the environment's visual quality. The method was designed to provide a systematic and objective approach to evaluating the visual changes that would potentially result from implementation of proposed projects.

The FHWA visual quality and aesthetics assessment method used in this technical memorandum is based on a set of broad criteria that consider the following factors related to the proposed project:

- The overall visual and aesthetic quality of the area through which the transportation project would pass.
- The visual and aesthetic experience and expectations of viewers (including residents, users of parks and other public spaces, pedestrians, and motorists).
- The scale and contrast between existing and proposed project elements in the area.

The FHWA's assessment method also uses professionally accepted, descriptive terminology that characterizes the physical attributes of the landscape being assessed and viewer sensitivity or concern. This terminology is defined below and in the glossary, and it is used throughout the following sections.

The FHWA visual quality assessment method has six steps:

1. Establish the project's area of visual influence by identifying contiguous "landscape units" and representative viewpoints. A landscape unit is an identifiable segment or area within a project that contains views of a project and that has characteristics that are different than the other landscape units. Representative viewpoints (or key observation points [KOPs]) from around the project area are selected to describe existing conditions (with photographs) and assess project effects (through the use of photo-simulations).
2. Determine who has views "of" and "from," the project ("viewer[s]") and their viewing sensitivity to changes in the viewed landscape.
3. Describe and assess the landscape that exists before project construction ("existing environment").
4. Assess the response of viewers looking both "at" and "from" the project, before and after project construction.
5. Determine and evaluate views of and from the project for before and after project construction using photo-simulations (simulations).
6. Describe the potential visible changes to the project area and its surroundings that would result from the proposed project ("project impacts or effects").

The first three steps were conducted to establish the "baseline" visual condition for the proposed project and are discussed in the Existing Conditions section. The last three steps were then conducted to identify how the proposed project alternatives would have the greatest potential to impact the visible landscape of the assessment area and affect viewers. The last three steps are discussed in the analysis section. The changes were systematically compared to the baseline conditions to determine the nature and degree of the project's potential impacts on visual resources.

An aesthetic and visual quality assessment typically addresses the following three primary questions:

- What are the aesthetic and visual qualities of the existing landscape in the project area?
- What are the potential effects of the project's proposed alternatives on aesthetic and visual quality in the project area?
- Who would see the project, and what is their likely level of concern about or reaction to how the project visually fits into the existing landscape?

Changes to the viewed environment are measured by determining how a proposed project would change the visual quality for selected representative views. Visual quality is an assessment of the composition of the character-defining features for the selected views. The assessment asks the following questions: Is this particular view common or dramatic? Is it a pleasing composition (with a mix of elements that seem to belong together) or not (with a mix of elements that either do not belong together or are eyesores and contrast with the other elements in the

surroundings)? Visual quality is evaluated in terms of vividness, intactness, and unity. The three characteristics are described as follows:

- **Vividness** is the degree of drama, memorability, or distinctiveness of the landscape components. Vividness is composed of the following four elements that usually influence the degree of vividness:
 - Landform
 - Vegetation
 - Water-features
 - Human-made elements
- **Intactness** is a measure of the visual integrity of the natural and human-built landscape and its freedom from encroaching elements. This factor can be present in well-kept urban and rural landscapes, as well as in natural settings. High intactness means that the landscape is free of eyesores and is not broken up by features that appear to be out of place. Intactness is composed of the following two primary elements that influence the degree of intactness:
 - Development
 - Encroachment
- **Unity** is the degree of visual coherence and compositional harmony of the landscape considered as a whole. High unity frequently attests to the careful design of individual components and their relationship in the landscape.

To determine existing visual quality and to assess impacts to viewers, the FHWA methodology uses numeric ratings. The ratings help to establish the existing visual quality of a view from selected viewpoints and to determine how the existing visual quality of the view would change (can be negative or positive) with the project in place. Visual quality is rated between 1 (low) and 7 (high). The visual quality ratings and their descriptors are as follows:

- 1 – Very Low
- 2 – Low
- 3 – Moderately Low
- 4 – Average
- 5 – Moderately High
- 6 – High
- 7 – Very High

To assess project impacts to viewers, changes in the existing visual quality ratings as a result of a proposed project are determined. The FHWA impact assessment methodology can establish varying intensities of impact. This approach is commonly used for NEPA impact assessments. For this VIA, three levels of intensity of impact (substantial, moderate, or negligible) were used. The impact assessment evaluated the degree to which alternatives would change the existing visual quality rating of a viewed landscape and considered the viewer sensitivity (high, moderate, and low) of people who would view the alternative in the landscape. Viewer sensitivity is discussed below in the existing conditions subsection. An impact with substantial intensity is defined as a change in the existing visual quality rating by the following: (1) Two or more ratings (for example, from high to moderate or moderate to low) in an area where people with high or moderate viewing sensitivity would see it, or (2) One rating in an area where people with high viewing sensitivity would see it. An impact with moderate intensity is defined as a change in the existing visual quality rating by one rating (for example, high to moderately high, or moderately low to low) in an area where people with moderate viewer sensitivity would see it. An impact with negligible intensity is defined as follows: (1) A change in the existing visual quality rating by one or more visual quality ratings in an area where people with low viewer sensitivity would see it, or (2) Areas where the proposed project would not change the existing visual quality rating and would be seen by viewers with high, medium, or low viewing sensitivity.

The FHWA methodology uses seven numeric ratings to establish the existing visual quality of a view from selected viewpoints and to determine how the existing visual quality of the view would change (can be negative or positive)

with the project in place. For this assessment, the elements and characteristics discussed in the previous paragraphs are rated between 1 (low) and 7 (high). The visual quality ratings and their descriptors are as follows:

- 1 – Very Low
- 2 – Low
- 3 – Moderately Low
- 4 – Average
- 5 – Moderately High
- 6 – High
- 7 – Very High

The ratings of the three characteristics (vividness, intactness, and unity) are then averaged to determine a total visual quality rating, which is also between 1 (low) and 7 (high). For example, if a view had a vividness rating of 5, intactness rating of 6, and a unity rating of 4, the three ratings would be added and divided by 3, which would produce an average total visual quality rating of 5.

The method that was used to determine existing visual quality and the visual quality associated with various alternatives involved five CH2M HILL staff with professional expertise in visual impact assessment and/or environmental planning, landscape architecture, and architecture. The staff reviewed existing conditions photographs of the KOPs and discussed and rated them as a team using the FHWA methodology. After the existing visual quality ratings were determined, visual simulations of the alternatives selected to be simulated were also observed and rated in the same manner by the group. Rating forms for the KOPs that were used to assess impacts are contained in Attachment C.

3.2 Developing Simulations

The simulations were prepared through a process that entailed photographic documentation of the views from each of the KOPs using a single-lens-reflex digital camera set to take photographs equivalent to those taken with a 35-millimeter camera using a 50-millimeter focal length, which is the camera lens setting that is commonly used in visual assessment because it closely resembles the viewing angle (or cone) of the human eye. For each view, computer modeling and rendering techniques were used to produce the simulated images. Existing topographic and site data provided the basis for developing an initial digital model. Engineers provided site plans and digital data for the preliminary design of alternatives. They were used to create three-dimensional (3-D) digital models of the alternatives. The models were then combined with the digital site model to produce a complete computer model of the alternatives.

For each KOP, the terrain and project features seen from it were digitized from topographic maps and scaled from aerial photographs using 5 feet as the assumed viewer eye level. Computer “wire frame” perspective plots were then overlaid on the photographs of the views from the KOP to verify scale and location. Digital visual simulation images were produced as a next step based on computer renderings of the 3-D model combined with high-resolution digital versions of the base photographs. The final hardcopy visual simulation images that appear in this document were produced from the digital image files using a color printer.

It should be noted that although the results provide an accurate depiction of how the components associated with alternatives might appear (based on current levels of design), all engineering design work associated with alternatives is preliminary, and many details need to be finalized. The simulations are intended to provide an indication of the form and scale of the alternative being simulated to assist in determining how the alternative would change the visual character and visual quality of the view from the KOP. Final design and design refinements will occur after the project’s environmental assessment process is complete.

4 Existing Conditions

4.1 Overview of the Project Area

The project area follows I-94 from west to east approximately 3.5 miles through the City of Milwaukee. The portion of the I-94 corridor examined in this VIA consists of areas from which changes associated with the alternatives could

potentially be seen. The character of the viewed landscape along the portion of the I-94 corridor in the study area varies considerably by location. The west end of the project area and the area north of I-94 east of the Stadium Interchange are residential. In between the residential areas are visually distinctive areas that include cemeteries, the Miller Park complex, and industrial areas in the Menomonee Valley. The degree of visibility of existing I-94 components along the I-94 corridor and the potential visibility of project alternative components varies greatly by location. Variables that influence visibility include terrain, the presence of trees and buildings that can block views, and the elevation of I-94 (some parts are below adjacent grade, some at grade, and some parts above grade). With the exception of areas near Miller Park, the areas from which I-94 can be seen generally range from areas adjacent to the highway to areas several blocks away.

4.1.1 Landscape Units

To assist in describing existing conditions and potential impacts from the project alternatives, the project area has been divided into six landscape units. Landscape units have unique, identifiable characteristics, and are useful tools for describing existing conditions and assessing potential impacts along linear transportation projects. The six landscape units used in this VIA units are as follows, from west to east:

1. West End
2. Cemeteries
3. Story Hill
4. Miller Park
5. Merrill Park
6. Menomonee Valley

The landscape units are depicted in Exhibit 2 and described below in the existing conditions section. Attachment 1 contains photographs from various locations within each landscape unit that illustrate the visual characteristics of the landscape units and/or views towards the I-94 corridor from within the landscape unit.

4.1.2 Viewers

Viewers within the project area include residents, roadway/highway users, commercial viewers, office viewers, people attending events at Miller Park, and Hank Aaron State Trail users. Sensitivity varies among viewer types, and sensitivity to views affects the viewer response to changes associated with a proposed project. Viewer sensitivity ranges from low to high. Low viewer sensitivity exists when there are few viewers who experience a defined view, or they are not particularly concerned about the view, such as commuters on the freeway. High viewer sensitivity exists when there are many viewers who have a view frequently or for a long duration, as well as viewers (many or few), such as those in a residential neighborhood, who are likely to be very aware of and concerned about the view (FHWA 1988).

The FHWA visual impact assessment system recognizes that most views are seen by a variety of viewer types with different sensitivities to changes in the viewed landscape. The FHWA system uses the most sensitive viewer type as the basis for determining the potential impact of a proposed project on viewers. For this project, the most sensitive viewers are residents, who are considered to have high viewer sensitivity. Many residents in the study area currently have existing views, or partial views, of I-94, and changes to those views may be of concern to them. People visiting the cemeteries are also considered to have high visual sensitivity. Although they likely do not visit or see the study area as often as nearby residents, the setting, or viewed environment, of the cemetery is likely an important part of the experience for many visitors. I-94 can be seen to varying degrees by people visiting the cemeteries adjacent to it and changes associated with the alternatives may be of concern to cemetery visitors; therefore, cemetery visitors are considered to be sensitive viewers in this VIA. Motorists on I-94 or adjacent roads are generally considered to have moderate to low sensitivity due to short viewing duration. People working in the study area are considered to have low viewing sensitivity because it is assumed that their attention is generally directed on their work activities rather than the nearby aesthetic environment. Like workers, people attending events at the Miller Park complex are assumed to be focused on the activity they are involved with or watching and not the surrounding environment. They are considered to have moderate to low viewing sensitivity. The viewing sensitivity of business customers varies by customer type. During the site visit, none of the business types, such as restaurants, that might base part of their

appeal on outward views were observed to have featured views towards I-94. Business customers are assumed to have moderate to low viewing sensitivity

4.2 Illustrative Photographs and Key Observation Points

Attachment 1 contains a series of photographs from within each landscape unit that depicts a range of visual/aesthetic characteristics found within the various landscape units. Exhibits A-1 and A-2 depict the locations of the photographs contained in Attachment 1. The photographs are not used in the impact assessment—they are intended to provide additional information about the visual conditions of the project area. To assist in assessing potential impacts from the proposed project, KOPs were selected within each landscape unit with input from stakeholders. As discussed previously in the methodology section, KOPs are used to establish existing conditions, determine how the proposed project would change the conditions, and determine impacts. Existing condition photographs and photo-simulations of various alternatives for each KOP are included in Attachment 2.

It should be noted that most of the photographs taken for the VIA were taken in January of 2013, during “leaf-off” conditions, when deciduous vegetation was without foliage. This VIA will use the term “leaf-off” and “leaf-on” to described conditions when deciduous vegetation either has, or does not have, foliage.

4.3 Landscape Unit Descriptions

The following subsections describe the six landscape units in the study area.

4.3.1 Landscape Unit 1: West End

Landscape Unit 1 begins at the western terminus of the proposed project near 70th Street and continues east to Hawley Road. Although Landscape Unit 1 is largely residential in land use and visual character, two large-scale features (I-94 and the American Transmission Company 138-kilovolt [kV] electrical transmission line) introduce non-residential visual features into this landscape unit. Both I-94 and the electrical transmission line greatly influence the landscape character of areas near them as well as visual quality. The influences of these features are woven into the descriptions below.

The influence of I-94 on adjacent areas within the landscape unit is different on the north and south sides of I-94. Residential areas containing sensitive viewers, located north of I-94, are separated from the interstate by the cleared right-of-way of the electrical transmission line that passes through the landscape unit north of I-94. The electrical transmission line right-of-way varies between approximately 115 and 150 feet in width and is located on a higher elevation than most of the residences to the north. Two sets of electrical transmission lines pass through the right-of-way, and their support structures tend to be silhouetted against the skyline and can dominate views close to them. An alley separates the edge of the electrical transmission right-of-way from the back property lines (and garages or other outbuildings) of single-family residences that face Fairview Avenue. Views of I-94 from the backs of some of these residences (and from some north-south oriented streets) are blocked in many locations by the sloped banks of the transmission right-of-way that are adjacent to the alley. Visual quality ratings of views to the south from most of the residences is considered to range from moderately low to low, depending on how much of the electrical transmission line and I-94 can be seen.

The visual character and quality of areas south of I-94 in Landscape Unit 1 is much different than areas to the north. I-94 is more visible to residential areas south of the interstate. The visibility of I-94 from areas to the south and I-94's influence on character and visual quality varies greatly by location. There are a number of residences immediately adjacent to I-94 (or to on/off ramps serving it) along north-south oriented streets that dead-end against I-94. Some of the residences have unobstructed views of I-94, whereas vegetation and fences screen views of the highway from other residences. The visual character of I-94 is typical of that of a major interstate highway, and adjacent areas with unobstructed views of it are influenced by its presence. The visual quality ratings for most of the areas adjacent to I-94 range from moderately low to low.

Attachment 1 contains five photographs from around Landscape Unit 1 that illustrate the character of Landscape Unit 1 and views towards I-94. KOP 1 was selected to represent views in Landscape Unit 1 towards I-94 that would potentially change with the alternatives being considered. It is described in the following subsection, and the existing view of I-94 from the location is included in Attachment 2.

KOP 1: Dixon Street

KOP 1 was selected to represent a residential area south of I-94. It is located where Dixon Street dead-ends west of Hawley Road (southwest quadrant of the Hawley Road interchange). The location has a clear view of I-94. Utilitarian features such as the 138-kV electrical transmission line support structure and conductors, other utility poles and lines, a cellular tower, and the I-94 overpass and chain-link fencing beneath it can be clearly seen from this location. The scale of the electrical transmission line structure makes it somewhat vivid, but the overall memorability of the view is lower than average. The variety of utilitarian elements and their horizontal and vertical presence introduce visual encroachments into this view that result in an intactness rating of low. The visual unity of the scene is moderately low, and the overall visual quality rating is between moderately low and low.

Vividness = 3

Intactness = 2

Unity = 3

Overall Visual Quality Rating = 2.7

4.3.2 Landscape Unit 2: Cemeteries

I-94 passes through the center of Landscape Unit 2. The western edge of Landscape Unit 2 is Hawley Road and its eastern boundary is Mitchell Boulevard. Within the landscape unit are five cemeteries, including Wood National Cemetery. North of I-94 and adjacent to it is the Beth Hamedrosh Hagodel Cemetery and a small parcel of Wood National Cemetery. Calvary Cemetery is north of these cemeteries and continues north to Bluemound Road. The electrical transmission line described in Landscape Unit 1 passes through Landscape Unit 2, north of I-94. It is located between the Beth Hamedrosh Hagodel and Wood National cemeteries and Calvary Cemetery. The transmission line corridor right-of-way is approximately 45 feet wide and, along with its support structures, is a major visual encroachment that diminishes the landscape character and visual quality of the cemeteries and the rest of the landscape unit.

Immediately south of I-94 is the Spring Hill Cemetery, Anshai Lebowitz Cemetery, and the main part of Wood National Cemetery. Farther south are Veterans Affairs (VA) properties, including the Zablocki VA Medical Center. The National Home for Disabled Volunteer Soldiers National Historic Landmark (NHL) is located in the area. Wood National Cemetery is a contributing historic property to the NHL. In addition to the cemeteries and the VA properties, the Hunger Task Force is located in Landscape Unit 2. It is situated at the west end of the landscape unit immediately south of I-94 and across the street (Hawley Court) from Spring Hill and Anshai Lebowitz Cemeteries. It is assumed for this VIA that people visiting the cemeteries described above have a concern for the environment of the cemetery they are visiting, thus they are considered to be sensitive viewers.

Attachment 1 contains six photographs that were taken from within Landscape Unit 2 (Photographs 6 through 12). Five KOPS were selected from within the landscape unit and are described in the following subsections. The existing views from the KOPs are located in Attachment 2.

KOP 2: South Dana Court (adjacent to Beth Hamedrosh Hagodel Cemetery)

This location was chosen to represent views of the cemetery that people visiting the cemetery (who are considered to be sensitive viewers) would have as they approach the cemetery entrance, as well as views by the general public from Dana Court. The view from this location includes the west end of Beth Hamedrosh Hagodel Cemetery, a chain-link fence bordering the cemetery, parts of Spring Hill Cemetery (including a mausoleum building) on the south side of I-94, and glimpses of the main portion of Wood National Cemetery. I-94 is close to the same elevation as KOP 2 and vehicles travelling on I-94 can clearly be seen. I-94 is a prominent visual feature that physically and visually separates the cemeteries on each side of it. The vividness of the view is higher than average due to the visual connection with the cemeteries to the south. The presence of I-94, the mausoleum, and the retaining wall on the south side of Spring Hill Cemetery encroach on this view and diminish its visual and compositional harmony, thus producing intactness and unity ratings of lower than average. The overall visual quality rating of this view is between average and moderately low.

Vividness = 4.5

Intactness = 3.5

Unity = 3.0

Overall Visual Quality Rating = 3.7

KOP 3: Beth Hamedrosh Hagodel Cemetery

KOP 3 also represents views of the I-94 corridor that visitors to Beth Hamedrosh Hagodel Cemetery see. There is a strong visual connection between the main portion of Wood National Cemetery and Beth Hamedrosh Hagodel Cemetery at the east end of the cemetery. Rows of white headstones, a rising grass slope, and a memorial obelisk at the top of the rise create a very vivid image. The vividness of this view is moderately high due to the visual connection with the national cemetery. The fence between Beth Hamedrosh Hagodel Cemetery and I-94 that was installed to block views of I-94 introduces a strong horizontal feature. Its presence is somewhat of an encroachment as is the I-94 signage, resulting in an intactness rating of average. The fence does, however, block most views of I-94 and improves visual unity, as do trees on both sides of I-94. The visual unity of the view is between average and moderately high. The overall visual quality rating is also between average and moderately high. During leaf-on times of year, the overall rating would be slightly higher because views of the I-94 signage would be blocked or partially blocked by trees.

Vividness = 5

Intactness = 4

Unity = 4.5

Overall Visual Quality Rating = 4.5

KOP 4: Wood National Cemetery (North Side of I-94)

This KOP is located in the parcel of Wood National Cemetery on the north side of I-94 and represents views that visitors would have when looking south at the main part of the cemetery. The view south up the grassy slope of the cemetery includes rows of headstones on both sides of I-94, the cemetery's iconic memorial obelisk, and mature trees. This vivid and memorable view occurs despite the presence of I-94, a fence on the south side of I-94 designed to block views, and a low retaining wall along the north side of I-94. These features, along with the I-94 signage, are encroachments into the view, but don't diminish the view as much as they might in other settings, due to the presence of the strong visual elements mentioned previously. The vividness rating of this view is somewhat higher than moderately high, and intactness is between average and moderately high. The horizontal presence of the fence, vehicles travelling on I-94, and the tall retaining wall on the south side of the highway actually provide a degree of visual unity, as does the similar appearance of the two portions of Wood National Cemetery on either side of I-94. Visual unity is moderately high. The overall visual quality rating of this view is high.

Vividness = 5

Intactness = 4.5

Unity = 5.0

Overall Visual Quality Rating = 4.8

KOP 5: Spring Hill Cemetery

KOP 5 is south of I-94 near the eastern edge of Spring Hill Cemetery, next to the western boundary of Wood National Cemetery. The view from this location represents views to the northeast that visitors to these parts of the two cemeteries have. The variety of headstones in Spring Hill Cemetery is an interesting juxtaposition to the regimented rows of headstones across I-94 in the northern parcel of Wood National Cemetery. Glimpses of Calvary Cemetery in the background are possible during leaf-off conditions. The overall vividness of this view is moderately high. Although the presence of I-94 is not as strong as it is at other KOPs, it can be seen, as can the edges of electrical transmission line support structures. The elements do not encroach too much into this view, however, so the intactness rating is between average and moderately high. Unity is also between average and moderately high, as is overall visual quality. During leaf-on conditions, trees would block views of the I-94 sign, and overall visual quality would somewhat improve.

Vividness = 5

Intactness = 4.5

Unity = 4.5

Overall Visual Quality Rating = 4.7

KOP 6: Wood National Cemetery (south side of I-94)

This KOP is located in the main portion of Wood National Cemetery south of I-94, approximately 120 feet northeast of the cemetery's memorial obelisk. This location was selected to represent views that people visiting this part of the cemetery have when looking northeast. The view includes the Zablocki Drive bridge, the electrical transmission line that parallels I-94 in this area, I-94, the northern parcel of Wood National Cemetery, and Calvary Cemetery in the background. The view is memorable due in part to the presence of the rows white headstones that accentuate the rolling topography on both sides of I-94 and the park-like setting created by numerous trees and expanses of lawn. The features result in a vividness rating of between average and moderately high. The presence of I-94 (and fencing paralleling it), vehicles, the Zablocki Drive bridge, and the electrical transmission line can be considered moderate intrusions that diminish the view, thus resulting in an intactness rating of between average and moderately low. The unity rating is between average and moderately above average, and the overall visual quality rating is average.

Vividness = 4.5

Intactness = 3.5

Unity = 4.5

Overall Visual Quality Rating = 4.2

4.3.3 Landscape Unit 3: Story Hill

Landscape Unit 3 includes the Story Hill neighborhood, located immediately north, northwest, and west of I-94, US 41, and the Stadium Interchange (I-94/US 41/Miller Park Way). It also includes two residential area south of Bluemound Road that are on either side of US 41. Areas to the north and west of Story Parkway are single-family residences. The two residential areas south of Bluemound Road, on either side of US 41, consist of multifamily (Story Apartments) and single-family dwellings.

The southern part of Landscape Unit 3 is the portion closest to I-94 and Miller Park parking areas. Residences are as close as approximately 170 feet from the north edge of I-94, but are higher in elevation than the highway so don't see its surface from most locations (they do have views of I-94 signs in some locations). Between the residences and I-94 is Story Parkway and vegetation south of the parkway and adjacent slope. The vegetation blocks most outward views from Story Parkway. Glimpses of Miller Park, parking areas, the electrical transmission line support structures and conductors ("wires"), and hills to the south are possible from several locations. Most areas further to the east and north along Story Parkway have outward views that are similarly screened. Near the intersection with Yount Drive, there are more open areas, so views of Miller Park, parking areas, the Stadium Interchange, and hills beyond are possible, particularly when deciduous trees and shrubs have foliage.

Attachment 1 contains three photographs from Story Parkway. Two additional photographs were taken to illustrate areas within Landscape Unit 3, located at the north and northeast end of the landscape unit near US 41 overpasses. Four KOPs were chosen for Landscape Unit 3 and are described in the following subsections. Existing views from the KOPs are located in Attachment 2.

KOP 7: Story Parkway

This location along Story Parkway is one of the closest points along the parkway to I-94. It was chosen to depict how project alternatives might impact views of locations that, unlike most of Story Parkway, do not contain extensive amounts of vegetation adjacent to the parkway that tends to block views from the parkway. The presence of vegetation, particularly during leaf-on conditions, tends to screen views to the south and southeast from the parkway so that viewers (such as residents) do not have street-level views much beyond the vegetation adjacent to the road. During leaf-off conditions, the view from this location includes Miller Park, I-94 signage, parking areas associated with the stadium, a vegetated hillside in the background behind the parking areas, glimpses of tall buildings in the background, and electrical transmission line conductors. Miller Park is a large, prominent, and visually distinct element when viewed from this location. Elevated views into the valley (containing parking areas) and of the tree-covered hills beyond are somewhat memorable. Due to the presence of the Miller Park, the vividness of this view is moderately high. The presence of the I-94 sign and the expansive light-colored parking areas that cover what is seen of the valley, result in an intactness rating between average and lower than average. The variety of objects and land

uses seen from this location and their varied characteristics result in a unity rating between average and lower than average. The overall visual quality rating of the view is average. During leaf-on conditions most of the objects viewed during leaf-off conditions would not be seen, and visual quality would be slightly higher.

Vividness = 5

Intactness = 3.5

Unity = 3.5

Overall Visual Quality Rating = 4

KOP 8: Story Parkway (near Pinecrest Street)

This location is on Story Parkway near its intersection with Pinecrest Street. The view from this KOP is to the south and can be seen by nearby residents and neighborhood residents driving past it. During leaf-off conditions, an I-94 sign can be seen through the branches of deciduous plants that are adjacent to the parkway as can light-colored parking areas in the valley below. The memorability or vividness of the view is moderately low, as is intactness. There is little visual unity in the view, so the unity rating is moderately low. The overall visual quality rating is moderately low. During leaf-on conditions, views of most of the objects seen from this location would be blocked and the view from this area would be more "parkway-like." The view of vegetation alongside the parkway would not be memorable but would be pleasant. The overall visual quality rating during leaf-on conditions would increase to between moderately low and average.

Vividness = 3

Intactness = 3.0

Unity = 3.0

Overall Visual Quality Rating = 3

KOP 9: Story Parkway (near Clarendon Place)

KOP 9 is located on the grass-covered slope east of Story Parkway, overlooking Yount Drive. It was selected to represent an area relatively free of vegetation near Story Parkway that offered an elevated view towards the Stadium Interchange. Observers from this KOP would primarily consist of people walking on an undeveloped trail that follows this side of Story Parkway, and to a lesser degree, residents on the northeast side of Story Parkway. The grass-covered slope in the foreground, and parkway vegetation, can be clearly seen, as can Yount Drive and a large paved parking area associated with Miller Park. I-94, US 41, and structures associated with the interchange can also be seen from this location as can the edge of Miller Park, electrical transmission line structures that silhouette the skyline, and hills in the background. The features that can be seen are not particularly memorable, so the vividness rating is between average and moderately low. Visual elements such as parking lots, roads, on- and off-ramps, elevated sections of US 41, and the electrical transmission line introduce a number of features that encroach on views. In terms of unity, however, this large-scale infrastructure-dominated landscape has a degree of visual coherence and an above-average unity rating. The overall visual quality of this view is lower than average.

Vividness = 3.5

Intactness = 2.5

Unity = 4.5

Overall Visual Quality Rating = 3.1

KOP 10: Yount Drive and Story Parkway

This location near the corner of Yount Drive and Story Parkway is northeast of the Miller Park entry sign. It was selected to represent views that nearby residents and people driving into the Miller Park parking area have when looking to the southeast. The view includes Yount Drive, the overhead entry sign, the parking area, and structures associated with Miller Park Way and US 41 and their adjacent embankments. It also includes the electrical transmission line structures and wooded hillsides in the background. This view is not memorable, and the vividness rating is between low and moderately low, as is the intactness rating. The strong horizontal presence of multiple transportation elements result is a slightly higher unity rating of moderately low. The overall visual quality of the view is between low and moderately low.

Vividness = 2.5

Intactness = 2.5

Unity = 3

Overall Visual Quality Rating = 2.7

4.3.4 Landscape Unit 4: Miller Park

Landscape Unit 4 includes Miller Park (the stadium, parking areas, and other associated facilities), the Stadium Interchange, segments of I-94, US 41, and Miller Park Way, railroad tracks, and a portion of the Hank Aaron State Trail (which is approximately 0.5 mile south of I-94). In much of this landscape unit, I-94, US 41, and Miller Park Way are above grade, as are other transportation features such as on- and off-ramps and arterial roads. Most of the land in this landscape unit is devoted to parking, industry, and transportation, and has a utilitarian character. The vast expanses of pavement in this area and the scarcity of view screening by trees or buildings allows for expansive views. Major visual features include Miller Park, the Stadium Interchange, various overpasses and on-off ramps, and the Menomonee River.

People who are considered to be viewers in Landscape Unit 4 are temporary viewers either passing through the area on transportation infrastructure, or people attending an event at Miller Park. Due to the temporary nature of their visits in this landscape unit and their likely attention to the activities they are watching or participating in, their viewer sensitivity is considered to be low.

Attachment 1 includes photographs from two locations within Landscape Unit 4. Because of the lack of sensitive viewers in this landscape unit and its utilitarian character, no KOP was selected for Landscape Unit 4.

4.3.5 Landscape Unit 5: Merrill Park

The west end of Landscape Unit 5 is adjacent to the Menomonee River. The landscape unit follows the north side of I-94 east through a residential neighborhood (Merrill Park) to the eastern terminus of the proposed project near 16th Street. Much of the area north of I-94 is similar to, or slightly higher in the elevation than, I-94.

Sensitive viewers within Landscape Unit 5 consist of nearby residents north of I-94. Park Hill Avenue parallels the north side of I-94, and a number of north-south oriented streets dead-end against it. Some north-south oriented streets such as 35th Avenue and 32nd Street pass over or under I-94 and link the neighborhood to areas to the south. The fronts of most residences on Park Hill Avenue are oriented south towards I-94, while residences on the north-south oriented streets that connect with it tend to face to the north-south. Vegetation is present within the I-94 right-of-way screens, or partially screened, views of I-94 from some of the residences located on Park Hill Avenue and the north-south oriented streets that connect to it. Where vegetation is not present, views to the south are uninterrupted (see KOP discussions in the following paragraphs). Locations along Park Hill Avenue with enough vegetation to screen views to the south vary considerably.

Attachment 1 contains photographs towards I-94 from two locations along Park Hill Avenue. Two KOPs were chosen to depict how the project alternatives might impact views from this area. The photographs of existing views from these KOPs are in Attachment 2.

KOP 11: 36th Street and Park Hill Avenue

This location was chosen to represent views to the south toward I-94 from a residential north-south oriented street that does not have views screened by vegetation. Viewers include people living along this street and nearby residents driving south of 36th Street. The most memorable object seen in this view is the electrical transmission line structure and the two utility poles that frame it from this location. The vividness rating is between moderately low and low. The intactness rating of low is largely due to the presence of the electrical transmission line structure and conductors. The mixture of objects seen from this view (including rooftops of buildings south of I-94) result in a unity rating of low. The overall visual quality rating of this view is low.

Vividness = 2.5

Intactness = 2

Unity = 2

Overall Visual Quality Rating = 2.2

KOP 12: 32nd Street and Park Hill Avenue

This southern view from 32nd Street, north of Park Hill Avenue, includes a view of the I-94 overpass. It was selected to display how changes associated with the alternatives would change views from this location (which is near single-family residences to the east and a nine-story, multifamily building to the west). Viewers include nearby residents and people travelling south under the overpass. The view from this location is not memorable or distinctive, and the vividness rating is moderately low. The overpass and roadway dominate views from this location and contribute to an intactness rating of low. Transportation elements are the main features seen from this view and create a somewhat unified scene that results in a unity rating of average. The overall visual quality of the view is moderately low.

Vividness = 3

Intactness = 2

Unity = 4

Overall Visual Quality Rating = 3

4.3.6 Landscape Unit 6: Menomonee Valley

Landscape Unit 6 is located along a part of the Menomonee Valley that is south of I-94. The area is industrial and commercial in land use and character and has few sensitive viewers. I-94 passes to the north above this low-lying landscape unit, and views of it are often interrupted by large-scale features such as industrial/commercial buildings and elevated roads/overpasses.

Two photographs from Landscape Unit 6 are included in Attachment 1 to illustrate views towards I-94 from within the landscape unit. Because of the lack of sensitive viewers in this landscape unit, its utilitarian character, and its low visual quality, no KOP was selected for Landscape Unit 6.

5 Visual Impacts

The following subsections describe the impacts that the alternatives being evaluated would have on the visual quality of views seen by sensitive viewers. As described previously in the methodology section, if an alternative being assessed would produce a change in visual quality of one or more visual quality categories (for example, moderately high to average, or moderately low to low) in an area where people with high viewer sensitivity (residents and cemetery visitors) would see it, the impact would be considered to be of substantial intensity for NEPA determination. If viewers with moderate to low sensitivity observed a change of one visual quality rating, the impact would be considered of negligible or moderate intensity for the NEPA assessment. If there were a change in visual quality rating of two ratings or more (for example, from high to moderate), and the changes were viewed by people with high or moderate viewing sensitivity, the impact would be considered to be substantial for the NEPA determination. Changes in visual quality observed by people with low viewer sensitivity would be assumed to have impacts that would be of negligible or moderate intensity. In many landscape units (and KOPs) the presence of the alternatives would alter visual quality, but not enough to lower the visual quality ratings. These impacts would be considered to be of negligible or moderate intensity.

As part of the visual impact analysis, the potential for noise barriers to influence the visual quality of the viewshed along the project corridor was not analyzed. The reason for this is that the location of noise barriers will not be decided until later in the study process after local residents have a chance to decide if they want the noise barriers. The presence of noise barriers could block or interrupt views beyond I-94 for motorists driving on I-94. However, for most viewers looking towards I-94 from nearby areas, the presence of noise barriers (that would range between 4 and 6 feet in height) would not significantly alter visual quality of views looking towards the alternatives that are discussed in this section.

5.1 West Segment Alternatives

Three alternatives were assessed for Landscape Unit 1 (West End): Alternative W1 (Braided Ramps); Alternative W2 (Collector-Distributor Roads); and the At-grade alternative. Alternatives W1 and W2 would replace the existing I-94 with two different configurations. Both Alternatives W1 and W2 would require parallel westbound and eastbound freeway lanes as well as braided ramps or collector-distributor roads (that would be built at different elevations than the freeway lanes). The freeway lanes of both alternatives would begin to gain elevation at approximately 62nd

Street so that they could converge with the Alternative C5 (Double Deck) that would pass through the cemetery segment (Landscape Unit 2). The at-grade alternative would be essentially the same elevation as the existing freeway and would be approximately two feet wider. The additional two feet of width would not be noticed by most viewers. With this alternative the 68th/70th Street interchange would be rebuilt in its current configuration and freeway entrance and exit ramps at the Hawley Road interchange would be removed in Landscape Unit 1.

5.1.1 Alternative W1: Braided Ramps

Most of Alternative W1 would be constructed at or near-grade, but the part east of 62nd Street would be elevated to connect with the double-deck alternative in the cemetery segment. The discussion of impacts to visual resources associated with Alternative W1 distinguishes between the impacts from the at-grade portion of the alternative and the elevated part. The at-grade portion (and the elevated part) of Alternative W1 would expand the I-94 corridor approximately 100 feet north into the 138-kV electrical transmission line right-of-way. The existing transmission line would be moved north to the edge of the existing right-of-way. No residences would be removed from the north side of I-94. Residential relocations along the south side of I-94 that would be adjacent to the at-grade portion of the alternative would be required beginning just west of South 66th Street and continuing east to approximately South 62nd Street. Approximately 20 residences would be relocated and replaced by Alternative W1 components (local road and ramps). This would result in I-94 components being closer to the remaining residences than is currently the case.

The top of the crash barriers of the elevated portion of Alternative W1 would be as high as 60 feet above adjacent grade, and the elevated ramps would range from 0 to 60 feet (to the top of the crash barriers) above adjacent grade. The elevated westbound ramp and the north side of elevated west- and eastbound freeway lanes of the I-94 structure would be visible from the backs of residences north of the I-94 corridor that face Fairview Avenue (as well as some nearby residences on north-south oriented streets). On the southern side of I-94, an elevated (on columns) eastbound entrance ramp would be constructed as high as 25 feet above the adjacent grade and would be visible from residences near it. Views by people driving on the elevated westbound freeway lanes would be more expansive than current views from I-94. The views of people driving along the eastbound freeway lanes would be similar to existing views in most locations, although the views would include ramps that would be part of Alternative W1.

KOP 1: Dixon Street - Alternative W1 would introduce transportation components into this view just west of Hawley Road that would be seen by nearby residents. The Alternative W1 components would be larger in scale and mass than most of the elements that are currently seen from this location (see Exhibit B-3 in Attachment 2 which is a simulation of Alternative W2, which in this location would be very similar in appearance to Alternative W1). The components depicted in the simulation included the two westbound freeway lanes (the upper structure) separating as they depart the double structure alternative, the westbound lane retaining wall/support structure, and the eastbound lane (the lower structure). The freeway lanes (and crash barriers lining them) and the support/retaining wall would slightly increase the vividness rating because of their large-scale, horizontal characteristics. The same characteristics that create a somewhat memorable view would be considered visual intrusions that would reduce the existing low intactness to very low. The visual unity rating would decrease from moderately low to between moderately low and low. The overall visual quality of the view would be reduced from between moderately low and low to low, which would be an impact of negligible intensity.

Vividness = 2.5 (Existing = 3)

Intactness = 1 (Existing = 2)

Unity = 2.5 (Existing = 3)

Overall Visual Quality Rating = 2.0 (Existing = 2.7)

Alternative W1: Braided Ramps Visual Impact Assessment

Alternative W1 would change the visual setting of Landscape Unit 1. The alternative would widen I-94, remove up to 20 residences on the south side of I-94, necessitate the relocation of the 138-KV electrical transmission line to the north of its current alignment, and introduce elevated transportation components into the eastern part of this landscape unit. Due largely to the existing presence of I-94 and the 138-kV electrical transmission line, the visual quality of views towards I-94 from within this landscape unit ranges from moderately low to low. Given the greater width and taller structures associated with Alternative W1 compared to the existing I-94, it would be seen over a greater area than I-94 is currently. However, when viewed from nearby areas, it would be consistent with the large-

scale transportation element character of the existing I-94 corridor. Alternative W1 would lower the visual quality of views towards it from nearby areas. However, the changes would not reduce the existing moderately low to low visual quality of views by residents in one or more categories, which is the criterion used in this VIA to determine a significant impact under NEPA. Alternative W1 would have an impact of negligible intensity on the visual quality of views towards I-94 from nearby areas in Landscape Unit 1.

5.1.2 Alternative W2: Collector-Distributor Roads

Alternative W2 (C-D roads) would require less lateral space on either side of I-94 than Alternative W1. As would be the case with Alternative W1, the western part of Alternative W2 would be constructed at, or near, grade. The eastern portion of Alternative W2 would require elevated structures to access the double deck alternative that would pass through the cemetery segment (Landscape Unit 2). The impacts of the at-grade section of the alignments discussed in the previous section, Alternative W1, would be very similar to this alternative. The main difference would be that Alternative W2 would require less horizontal area than Alternative W1 and would require the removal of fewer residences (approximately 8 with the 70th/68th Street Split Diamond Interchange Alternative and approximately 12 with the 70th Street Diamond Interchange Alternative). The primary differences between Alternatives W1 and W2 would be the elevated parts of their routes. With Alternative W2, the westbound collector-distributor road and westbound lanes of I-94 along the north side of the alignment would be built at, or close to, grade. In addition, Alternative W2 would not require as much space north of the existing I-94 alignment as Alternative W1 would. Some sections of Alternative W2 components on the south side of I-94 such as collector-distributor roads and ramps connecting with freeway lanes would be built on elevated structures, and other sections would be at-grade. The top of the eastbound structure that would cross over Hawley Road would be approximately 35 feet above the adjacent grade. It would be clearly seen from adjacent residences and some nearby residences on north-south oriented streets. Views by people driving on the elevated eastbound freeway lanes, ramps, and collector-distributor roads would be more expansive than current views from I-94. People driving on the essentially at-grade westbound freeway lanes and collector-distributor road would have views that would be similar to existing views in most locations.

KOP 1: Dixon Street - From this location just west of Hawley Road, Alternative W2 would be very similar in appearance to Alternative W1 (see Exhibit B-3 in Attachment 2). The primary difference between the two alternatives would be that with Alternative W2, slightly more of the electrical transmission line structure and trees next to it would be visible between the upper (eastbound) and lower (westbound) structures compared to Alternative W1. There would be slightly more visual connection between this location and the objects north of the Alternative W1 structures, but because of the low visual quality of the viewed objects, there would be little to no improvement in visual quality compared to Alternative W1. Alternative W2 would have an impact of negligible intensity to views towards I-94 from KOP 1.

Vividness = 2.5 (Existing = 3)

Intactness = 2 (Existing = 2)

Unity = 2.5 (Existing = 3)

Overall Visual Quality Rating = 2.0 (Existing = 2.7)

Alternative W2: Collector-Distributor Roads Visual Impact Assessment

Alternative W2 would be similar to, and consistent with, the existing major transportation element character of the portion of the I-94 corridor that passes through Landscape Unit 1. The alternative would not reduce the existing moderately low to low visual quality ratings of views from within this landscape unit towards I-94 one rating or more. Therefore, Alternative W2 would have an impact of negligible intensity.

5.1.3 At-Grade Alternative

The at-grade alternative would essentially retain I-94 at its current elevation as it travels through Landscape Unit 1. I-94 would be expanded to four lanes in each direction and would be slightly wider than it is currently. The 68th/70th Street interchange would be rebuilt in its current configuration and freeway entrance and exit ramps at the Hawley Road and Mitchell Boulevard (east of Landscape Unit 1) interchanges would be removed. The view from KOP 1: Dixon Street would be similar to the existing view in terms of the elevation of the overpass above the adjacent grade.

At-Grade Alternative Visual Impact Assessment

Because the at-grade alternative would have essentially the same grade and close to the same width as the existing freeway, its character would not change, nor would the visual quality of views towards it from residences to the north and south. Views by motorists driving on this part of I-94 would also not change greatly. The reconstruction of the 68th/70th Street interchange (the alignment would be the same as the existing alignment) would not change the character or visual quality of areas near the interchange. The removal of freeway entrance and exit ramps at the Hawley Road interchange (and the Mitchell Boulevard interchange east of Landscape Unit 1) would not change the character of the freeway corridor or change the visual quality of views towards I-94 from areas near it or from the freeway by passing motorists. Impacts from the at-grade alternative would be of negligible intensity under NEPA.

5.1.4 West Segment Visual Impact Assessment Summary

All three alternatives would be consistent in character with the existing major transportation element character of the I-94 corridor that passes through Landscape Unit 1. Although both Alternatives W1 and W2 would introduce new, large-scale components into the I-94 corridor, neither alternative would lower existing visual quality enough to have impacts of substantial intensity under NEPA. Differences between the two Alternatives in terms of how they would change the existing visual environment would include the Alternative W2 requiring less horizontal area than Alternative W1, and removing fewer residences. With Alternative W2, the westbound collector-distributor road and westbound freeway lanes of I-94 along the north side of the alignment would be built at, or close to, grade as opposed to much of these components being elevated with Alternative W1. Both alternatives would require elevated structures on the south side of I-94, although the retaining wall along the south side of the I-94 right-of-way associated with much of Alternative W2 would be more visually prominent from areas to the south than would Alternative W1 structures. The at-grade alternative would essentially maintain the elevation of the existing freeway and slightly increase the width. The presence of the at-grade alternative and the removal of freeway entrance and exit ramps at the Hawley Road interchange (and the Mitchell Boulevard interchange east of Landscape Unit 1) associated with the at-grade alternative would not change the character of I-94 corridor or change the visual quality of views toward it. As a result, impacts from the at-grade alternative would be of negligible intensity under NEPA.

5.2 Cemetery Segment Alternatives

The structures associated with the double deck Cemetery alternatives would begin in Landscape Unit 1 (West End), pass through all of Landscape Unit 2 (Cemeteries), and continue south of Landscape Unit 3 (Story Hill) into Landscape Unit 4 (Miller Park). The footprints of all of the alternatives would stay within the existing 110-foot-wide I-94 right-of-way between the adjacent cemeteries (although temporary construction areas for Alternatives C2 and C5 within the cemeteries would likely be required). Alternative C2 would be at-grade. Alternative C5 would be above grade and would have two options; the All Up and Partial Down. A third option for a double deck alternative, the all down option, was considered, but not evaluated as part of this VIA because it's impact would be very similar to that of the at-grade alternative. The elevation of the at-grade alternative would be very similar to the existing I-94 elevation and would require the removal of exit and entrance ramps associated with interchanges at the west (Hawley Road) and east (Mitchell Boulevard) ends of the cemetery segments.

5.2.1 Alternative C2 (At-grade)

Alternative C2 would remain at-grade through Landscape Unit 2 but would require the removal the Hawley Road and Mitchell Boulevard interchanges. Existing views by sensitive viewers from within the cemeteries towards I-94 and beyond would essentially remain the same as it is today. The removal of the entrance and exit ramps to Hawley Road (which would be located in both Landscape Units 1 and 2) and Mitchell Boulevard would have little to no effect on the visual setting of the areas near them or from the cemeteries.

Mitchell Boulevard would continue to cross I-94, but would have two options related to its connection with the VA property. One option would provide a connection to the VA from Mitchell Boulevard and the other would not provide the connection. This would result in a change in elevation of I-94 in order to allow Mitchell Boulevard to connect with the VA campus. If Mitchell Boulevard was to connect to the VA campus, I-94's elevation would be slightly higher, as would the new Zablocki Drive bridge.. Exhibit B-8 (Simulations D and E) depict how the Alternative C2 and the Zablocki Drive bridge options would appear from a location within the Wood National Cemetery. The

raising and replacing of the Zablocki Road bridge over I-94 would not change the visual character of areas near it or the visual quality of views towards it from the cemeteries.

KOP 6: Wood National Cemetery (South Side of I-94) - As depicted in Exhibit B8 (Simulations D and E) in Attachment 2, the presence of Alternative C2 would minimally change the existing view from this location. The only real change would be that the existing Zablocki Drive bridge would be replaced with taller structures. The option that would provide a connection to the VA from Mitchell Boulevard (see Exhibit B8) would require a slightly taller replacement structure for Mitchell Boulevard than the option that would not provide access (see Exhibit B8). Differences in the appearance to the two options when viewed from this location would be minimal.

Vividness = 4.5 (existing = 4.5)

Intactness = 3.5 (existing = 3.5)

Unity = 4.5 (existing = 4.5)

Overall Visual Quality Rating = 4.2 (existing = 4.2)

Alternative C2 (At-Grade) Visual Impact Assessment

Alternative C2 would not change the major transportation element character of the I-94 corridor from areas within the cemeteries that would have views of it. It would slightly change the appearance of I-94 (and remove the interchanges—most of which are not be seen by sensitive viewers within the cemeteries). Alternative C2 would have little impact on visual quality and would not reduce current visual quality one rating or more; therefore, its impact would be of negligible intensity under NEPA.

5.2.2 Alternative C5 (Double Deck): All Up and Partial Down Options

Both of the options being considered for Alternative C5 (All Up and Partial Down) would include a double-deck structure with 4 freeway lanes in each direction. The height from the top of the tallest double-deck structure being considered for the Alternative C5 All Up option would range from approximately 30 feet to approximately 10 feet above the adjacent grade. The Partial Down option would be similar to the All Up option, but would be lowered into the existing I-94 corridor. The top of the tallest double-deck structures being considered for the Partial Down option would be up to six to eight feet lower than the All-Up option. The double-deck structures associated with both options would intrude on views by sensitive viewers across I-94 from cemeteries on either side of I-94. Although the elevated structure associated with the Partial Down option would be up to eight feet lower than the All Up option, there would be relatively little differences in view blockage. The KOP evaluations below provide more detail and Exhibits B-4 through B-10 in Attachment 2 contain simulations of both options of Alternative C5 as would be viewed from various locations.

The degree of impact of both the Alternative C5, All Up and Partial Down options would be dependent upon several factors, including how high the top of the double-deck structure would be compared to the adjacent grade, the type of structure used to support the components (solid walls would have slightly greater visual impacts than walls with openings for airflow), the degree of screening (if any) that would be provided to screen views of the double-deck (particularly the support walls), and the type of wall treatments that could be used to make the walls more visually appealing. Views by people driving on the top freeway lanes (the top deck) would be more expansive than current views from I-94, whereas views from the lower deck would essentially be blocked by adjacent structural walls (although some openings in the walls to allow airflow would potentially provide glimpses of adjacent areas).

The simulations that were developed for the KOPs below depict some views of Alternative C5 with a solid double-deck structure and some with openings for airflow. The openings would provide some visual connection between cemetery and areas behind the double-deck structure and would make the double-deck structure somewhat less massive in appearance (see Simulations B and C in Exhibits B-6 and B-8 in Attachment B). Because the All Up option would be taller than the Partial Down option, the air flow openings of the All Up option would be also be taller and would allow more of the area behind the double deck structure to be viewed compared to the Partial Down option. Depending upon the final design of the openings, the openings could introduce interesting architectural elements to the double-deck structure.

KOP 2: South Dana Court (adjacent to Beth Hamedrosh Hagodel Cemetery) - The top of the Alternative C5 All Up option crash barrier on the upper deck would be approximately 23 to 28 feet above grade. The double-deck

structure would block views by sensitive viewers to the south of the visual elements found in Spring Hill and Wood National cemeteries that contribute to vividness (see Exhibit B4 in Attachment 2). The vividness rating of the existing view would be reduced from above average to very low. From this location, the double deck would dominate views to the south and throughout the cemetery. It would be a major encroachment that would lower the existing lower-than-average intactness rating of views to the south to very low. Although not simulated, the top of the Alternative C5 Partial Down option would be approximately six feet lower than the All Up option and would not improve the visual quality rating of the view from this location. The overall visual quality rating of the Alternative C5 All-Up option would be lowered from slightly below average to between very low and low and would have an impact of substantial intensity to views from KOP 2.

Vividness = 1.3 (existing = 4.7)

Intactness = 2.0 (existing = 3.5)

Unity = 2.0 (existing = 3.0)

Overall Visual Quality Rating = 1.8 (existing = 3.7)

KOP 3: Beth Hamedrosh Hagodel Cemetery (East End) - The Alternative C5 All Up option would block existing southeastern and southern views (see Exhibit B-5 in Attachment 2). It would eliminate the visual connection between the cemetery and the main portion of Wood National Cemetery. The elements in the cemeteries that contribute to the vividness of the view would no longer be seen, and the vividness rating would be reduced from between moderately high and high to low. The double-deck would be an encroachment on the view, and the views intactness rating would be lowered from average to between lower than average and low. Views of the trees and cemetery elements on both sides of I-94 that create visual linkage would be lost, and visual unity would be reduced to lower than average. The overall visual quality of the KOP 3 view would change from between average and moderately high to between lower than average and low. The Alternative C5 All Up option would have an impact of substantial intensity to sensitive viewers near KOP 3. The Partial Down option would have similar impacts to sensitive viewers and the visual quality rating of the view from this location.

Vividness = 2.0 (existing = 5)

Intactness = 2.5 (existing = 4.0)

Unity = 3.0 (existing = 4.5)

Overall Visual Quality Rating = 2.5 (existing = 4.5)

KOP 4: Wood National Cemetery (North Side of I-94) - The double deck structure along this portion of the I-94 corridor would block southern views from this location towards the main part of Wood National Cemetery (see Exhibit B-6 in Attachment 2). The double deck structure associated with both the All Up and Partial Down options depicted in Exhibit B6 (solid wall, no visual openings) of Attachment 2 would reduce the vividness rating of the view from between moderately high and high to almost low. The intactness rating would also be lowered by the encroaching presence of the double deck, as would visual unity. The overall high visual quality rating of this view would be reduced to between moderately low and low. Both options of Alternative C5 without air flow openings would have impacts of substantial intensity to views by sensitive viewers from KOP 4.

Vividness = 2.0 (existing = 5.5)

Intactness = 2.5 (existing = 4.5)

Unity = 2.5 (existing = 5.0)

Overall Visual Quality Rating = 2.3 (existing = 5)

Exhibit B-6 of Attachment 2 also contains simulations of both the Alternative C5 All Up and Partial Down options with air flow openings. The openings would provide some visual connection with the main part of the Wood National Cemetery and provide architectural interest compared to a solid wall. The openings would have slightly less of an impact to the visual quality rating of the view from this location compared to double deck structures with no air flow openings.

Vividness = 3.0 (existing = 5.5)

Intactness = 2.5 (existing = 4.5)

Unity = 3.0 (existing = 5.0)

Overall Visual Quality Rating = 2.8 (existing = 5)

KOP 5: Spring Hill Cemetery - The double-deck of the Alternative C5 All Up option would block views to the north of most of the elements of the north parcel of Wood National Cemetery that can be seen from this location (the tops of trees would still be seen) as well as views of I-94 signage. Views of the rows of white headstones in Wood National Cemetery would be blocked by the long, continuous support wall of the double-deck as would other elements that currently create a vivid view (see Exhibit B-7 in Attachment 2). The vividness rating of almost high would be reduced to between moderately low and low. The existing intactness and unity ratings would also be lowered. The overall visual quality ratings of the view would be lowered from between average and high to between low and moderately low. The Alternative C5 All Up option would have an impact of substantial intensity to views to the north from KOP 5.

Vividness = 2.5 (existing = 5)

Intactness = 2.5 (existing = 4.5)

Unity = 3.0 (existing = 4.5)

Overall Visual Quality Rating = 2.7 (existing = 4.7)

KOP 6: Wood National Cemetery (South Side of I-94) - Views to the north of the northern parcel of Wood National Cemetery would be blocked by the double-deck structure (see Exhibit B-8 in Attachment 2) although the tops of trees north of I-94 would be seen. With the Alternative C5 Partial Down option there would be views of the top of elevated part of the Calvary Cemetery that would not be seen with the All Up option. The overall vividness rating and unity of the view from KOP 6 would be reduced from between average and moderately above average to lower than average. The overall visual quality rating would be lowered from average to lower than average. Both Alternative C5 options (no openings) would have impacts of substantial intensity to views from KOP 6.

Vividness = 3.0 (existing = 4.5)

Intactness = 2.5 (existing = 3.5)

Unity = 3.0 (existing = 4.5)

Overall Visual Quality Rating = 2.8 (existing = 4.2)

Exhibit B-8 includes simulations of both the Alternative C5 All Up and Partial Down options. The All Up option is simulated with no air flow openings (Simulation A). The Partial Down option is simulated with air flow openings (Simulation B). From this elevated viewing angle the air flow openings would not provide visual connection areas behind the double-deck structure of either option, but would provide architectural interest (particularly the All Up option) compared to a solid wall. The air flow openings would have slightly less of an impact to the visual quality rating of the view from this location compared to double deck structures with no air flow openings. Both Alternative C5 options would still have impacts of substantial intensity to views from KOP 6 by sensitive viewers.

Vividness = 3.5 (existing = 4.5)

Intactness = 3.0 (existing = 3.5)

Unity = 3.0 (existing = 4.5)

Overall Visual Quality Rating = 3.2 (existing = 4.2)

Alternative C5: All Up and Partial Down Options Visual Impact Assessment

The Alternatives C5 options would introduce large-scale transportation infrastructure into the I-94 corridor. The structures would reflect the existing major transportation infrastructure character that I-94 currently exhibits, but would block views between the cemeteries to varying degrees. Their presence would eliminate the expansive character of the views from the cemeteries. Air flow openings for the double deck structure with both the All Up and Partial Down options would provide some limited visual connection between the cemeteries (depending upon viewing location) and add architectural interest compared to solid walls. The double decks associated with the two Alternative C5 options would reduce the existing visual quality ratings all five KOPs in this landscape unit by one or more visual quality ratings and would have impacts of substantial intensity.

5.2.3 Cemetery Segment Visual Impact Summary

All of the alternatives would reflect the existing major transportation infrastructure character that I-94 currently exhibits. However, they would have different impacts on the character of adjacent cemeteries. Alternative C2 would

allow a visual connection between the cemeteries on both sides of I-94 to be maintained. The visual connection that is now possible (although degraded by the presence of I-94) visually connects the various cemeteries and creates the sense of a much larger and more expansive cemetery area than the individual cemeteries do by themselves.

The Alternative C5 options would block views between the cemeteries to varying degree. Both the All Up or Partial Down options would eliminate the expansive character of views from cemeteries on both sides of I-94 to the other side of I-94. Air flow openings for the double deck structure with both the All Up and Partial Down options would provide some limited visual connection between the cemeteries (depending upon viewing location) and add architectural interest compared to solid walls.

Alternative C2 would not have the degree of impact that the Alternative C5 options would have. Alternative C2 would have an appearance very similar to that of the existing freeway when viewed from the cemeteries and would have an impact of negligible intensity under NEPA, whereas both the Alternative C5 options would have impacts of substantial intensity. The double decks associated with the two Alternative C5 options would reduce the existing visual quality ratings all five KOPs in this landscape unit by one or more visual quality ratings.

5.3 Stadium Interchange Alternatives

The Stadium Interchange alternatives would be centered in Landscape Unit 4 (Miller Park), but would continue into, or be seen in close proximity from, Landscape Units 3 (Story Hill), 5 (Merrill Park), and 6 (Menomonee Valley). Three alternatives are being evaluated for the Stadium Interchange area, the portion of Alternative C5 that would enter this landscape unit, Alternative S2 (system interchange—low-speed, free-flow), and Alternative S3 (single-point interchange with free-flow ramps from I-94). All three would occur north and east of Miller Park in areas with no, or very few, sensitive viewers. The closest part of the Stadium Interchange area to sensitive viewers is the northwest part near the southern and eastern edges of the Story Hill neighborhood. Various combinations of roads and ramps would depart or merge with the main I-94 freeway lanes. The eastern part of the Story Hill neighborhood is not as high above adjacent terrain as the southern-southeastern part, but some areas have expansive existing views that include major transportation infrastructure (I-94, US 41, etc.), parking areas for Miller Park, and parts of Downtown Milwaukee, several miles away.

The east end of Alternative C5 would transition from the Cemetery Segment through the Stadium Interchange Segment past the Story Hill neighborhood. The top of the elevated freeway lanes would be slightly below that of some parts of the Story Hill Neighborhood.

Alternative S2 and S3 would have different combinations of elements (collector-distributor roads, entrance and exit ramps [at-grade and above grade], bridges, etc.) at varying distances from the Story Hill neighborhood. As in the Cemetery Segment alternatives discussion, the potentially most visible alternative component that might be used in the alternatives being considered were used to determine potential visual impacts to the Story Hill neighborhood. The structures that were modeled to determine impacts include continuations of the tallest possible double-deck alternative that would pass through the Cemetery Segment (Landscape Unit 2) and transition to a number of options just east of the southeast corner of the Story Hill neighborhood and elevated ramps. The impacts of alternative structures on the KOPs near them (KOPs 7, 8, 9 and 10) are described in the following subsections.

5.3.1 Alternative C5: All Up and Partial Down Options

If a double deck (Alternative C5) were built through the Cemetery Segment west of the Story Hill neighborhood it would transition eastward through the Stadium Interchange Segment to connect with I-94. Both the Alternative C5 All Up and Partial Down options would be higher than the existing I-94 structure. The following describes impacts associated with the portion of Alternative C-5 in Landscape Unit 4 (Miller Park) that would be near two KOPs in the Story Hill neighborhood.

KOP 7: Story Parkway - The top of the upper freeway lanes of the elevated structure of both the Alternative C5 All Up and Partially Down options as well as vehicles travelling on it would be seen through the shrubs and trees that line the south side of Story Hill Parkway during leaf-off conditions by residents living near this location or passing by (see Exhibit B-9 in Attachment 2). During leaf-off conditions, the All Up option would block slightly more of the hillsides seen in the distance beyond the upper freeway lanes than the Partial Down option would. The upper lanes of

the structure and vehicles travelling on it would slightly lower vividness, but would not interfere with views of the iconic Miller Park or the hillsides beyond. At night during leaf-off conditions, vehicles lights from vehicles on the elevated structure could be seen. During leaf-on conditions, the lights would likely not be seen, nor would much of the structure of either option. The viewed landscape contains a mix of uses, including extensive parking areas, which is why its visual integrity was rated as between average and moderately low. With part of the upper freeway lanes and vehicles added to the view, visual integrity would be reduced to moderately low. The overall visual quality of the view from this location during leaf-off conditions would decrease from average to between average and moderately low. This change would produce an impact of negligible intensity.

Vividness = 3.3 (existing = 5.0)

Intactness = 3.0 (existing = 3.5)

Unity = 3.0 (existing = 3.5)

Overall Visual Quality Rating = 3.1 (existing = 4.0)

KOP 8: Story Parkway and Pinecrest Street - During leaf-off conditions, the upper freeway lanes of the elevated structure associated with the Alternative C5 All Up and Partially Down options and vehicles on it would be seen through branches by residents and people passing by (see the simulation of the All Up option depicted in Exhibit B-10 in Attachment 2). The unremarkable view from this location would not change with the presence of the elevated structure and its moderately low vividness rating would remain the same. The elevated structure would block existing views of the parking areas in the valley below, seen through the bare branches, which would slightly improve visual intactness (as would the removal of the existing I-94 sign depicted in the simulation). The presence of the elevated structure would somewhat lower visual unity during leaf-off conditions. The overall visual quality rating during leaf-off conditions would somewhat decrease compared to existing conditions, but would not change during leaf-on conditions, when the elevated structure and most vehicles travelling on it would be screened by vegetation. During leaf-off conditions, visual quality would decrease from between average and moderately low to moderately low. During leaf-on conditions visual quality would decrease very little, if at all. The Alternative C5: All Up option would produce an impact of negligible intensity.

Vividness = 3.0 (existing = 3.0)

Intactness = 3.0 (existing = 3.0)

Unity = 3.0 (existing = 3.5)

Overall Visual Quality Rating = 3.0 (existing = 3.2)

Alternative C5: All Up and Partial Down Options Visual Impact Assessment

The components of the upper freeway lanes of the elevated structures of both the Alternative C5 All Up and Partially Down options would be taller than the existing I-94 structure. The upper freeway and structures vehicles travelling on them would be seen from some areas of the Story Hill neighborhood during leaf-off conditions. The structures would partially block generally unremarkable views of industrial areas in the Menomonee Valley, but would not greatly decrease visual quality. During leaf-off conditions, Alternative C5 would have an impact of negligible intensity. During leaf-on conditions, view of Alternative C5 components would be generally screened by vegetation. Impacts would be less than those described during leaf-off conditions.

5.3.2 Alternative S2 (System Interchange—Low-Speed, Free-Flow)

The alternative would require several components such as collector-distributor roads and ramps that would be northwest of the center of the Stadium Interchange and be located between the interchange and the edges of the Story Hill Neighborhood. The closest components would be located along the eastern edge of the Miller Park parking area and would be approximately 550 to 600 feet east of Story Parkway. The following describes impacts associated with Alternative S2 that would be seen from two KOPs in the Story Hill neighborhood. A number of structures associated with Alternative S2 would be clearly seen from this location. The structures would be located within part of the Miller Park parking lot that is seen clearly from this location and would block views behind them. The vividness rating of this unremarkable view would not change, nor would it visual unity. Intactness would be slightly reduced from between moderately low and low to low. Overall visual quality would be lowered slightly but would remain between moderately low and low. Alternative S2 would produce an impact of negligible intensity.

Vividness = 2.5 (existing = 2.5)

Intactness = 2 (existing = 2.5)

Unity = 3 (existing = 3)

Overall Visual Quality Rating = 2.5 (existing = 2.7)

Alternative S2 (System Interchange—Low-Speed, Free-Flow) Visual Impact Assessment

Alternative S2 would contain components that would be seen from some locations along the edge of the Story Hill neighborhood. The components would not greatly change the visual quality of outward views from these locations or block views of vivid or memorable elements (views of Miller Park would remain). Views from along most of North Story Parkway are blocked during leaf-on times of the year by trees and shrubs planted north and east of North Story Parkway. Changes associated with Alternative S2 would not reduce the existing moderately low to low visual quality of views by residents in one or more categories. Alternative S2 would result in an impact of negligible intensity to views from the Story Hill Neighborhood.

5.3.3 Alternative S3 (Single Point Interchange Alternative)

Compared to Alternative S2, this alternative would have taller structures adjacent to the southern edge of the neighborhood and fewer components located in the Miller Park parking area east of the Story Hill Neighborhood. The taller structures would include higher elevated freeway lanes and ramps that would be seen to varying degrees as described in the descriptions of the following four KOPs located along the southern and eastern edges of the Story Hill neighborhood.

KOP 7: Story Parkway - An elevated ramp that connects US 41 with the elevated freeway lanes of Alternative S3 would be seen through shrubs that line the south side of Story Hill Parkway during leaf-off conditions (see Exhibit B-9 in Attachment 2). The Alternative S3 components would block views of the Miller Park parking areas, but would also block views of part of Miller Park. This alternative would change views to the south more than Alternative S2 would, particularly during leaf-off conditions. It would reduce vividness and intactness slightly and lower overall visual quality from average to almost moderately low and would result in an impact of negligible intensity.

Vividness = 4.0 (existing = 5.0)

Intactness = 3.0 (existing = 3.5)

Unity = 2.5 (existing = 3.5)

Overall Visual Quality Rating = 3.2 (existing = 4.0)

KOP 8: Story Parkway and Pinecrest Street - During leaf-off conditions an elevated ramp and the freeway lanes of the elevated structure of Alternative S3 would be seen and would block views of parking areas associated with Miller Park (see Exhibit B-10 in Attachment 2 which is a simulation of Alternative C5, but very similar in appearance to Alternative S3). During leaf-on conditions, these components would be more difficult to see. The presence of the Alternative S3 components would somewhat lower the existing visual quality components and overall visual quality during leaf-off conditions, but would produce an impact of negligible intensity. During leaf-on conditions visual quality would decrease very little.

Vividness = 3.2 (existing = 3.2)

Intactness = 3.5 (existing = 3.0)

Unity = 3.0 (existing = 3.5)

Overall Visual Quality Rating = 3.1 (existing = 3.4)

KOP 9: Story Parkway (Northeast West Clarendon Place) - Alternative S3 components would be seen along the eastern edge of the Miller Park parking area or along the I-94 corridor behind it (see Exhibit B-11 in Attachment 2). The components would be seen from some areas along Story Parkway, but would be similar in character to the existing views of the Stadium Interchange area. The overall visual quality rating of between average and moderately low would not change with Alternative S3. Impacts would be of negligible intensity.

Vividness = 3.5 (existing = 3.5)

Intactness = 3.0 (existing = 2.5)

Unity = 4.0 (existing = 4.5)

Overall Visual Quality Rating = 3.5 (existing = 3.5)

KOP 10: Yount Drive and Story Parkway - Alternative S3 components would be seen along the eastern edge of the Miller Park parking area and/or along the I-94 corridor behind it (see Exhibit B-12 in Attachment 2). The components of Alternative S3 that would be seen would be similar in character to the elements associated with Stadium Interchange and the portions of each freeway that that can be seen from this location. The overall visual quality would be slightly reduced but would remain between moderately low and low and impacts would be of negligible intensity.

Vividness = 2.5 (existing = 2.5)

Intactness = 2 (existing = 2.5)

Unity = 3 (existing = 3)

Overall Visual Quality Rating = 2.5 (existing = 2.7)

Alternative S3 (Single Point Interchange Alternative) Visual Impact Assessment

Components of Alternative S3 would be seen from the portions of the Story Hill neighborhood described above during leaf-off conditions. The components would not greatly change the visual quality of outward views from these locations, even during leaf-off conditions or block views of vivid or memorable elements such as Miller Park. Views from along much of Story Parkway are blocked during leaf-on times of the year by trees and shrubs planted along Story Parkway. Changes associated with Alternative S3 would not reduce the visual quality ratings of views by one or more categories, which is the criterion used in this VIA to determine a significant impact under NEPA. The impact of Alternative S3 on views from the Story Hill Neighborhood towards the I-94 corridor and the I-94/US 41 interchange area would be of negligible intensity.

5.3.4 Stadium Interchange Segment Visual Impact Summary

Components of the three alternatives would be seen to varying degrees from several locations along the southern and eastern edges of the Story Hill neighborhood. Most views from Story Hill Parkway in the south and eastern parts of the neighborhood are screened, or partially screened, by roadside vegetation. As depicted in the simulations from KOPs 7 and 8, the top of the upper freeway lanes and vehicles on them associated with both the All Up and Partial Down options of Alternative C5 (Double Deck) would be seen during leaf-off conditions. They would be difficult to see during leaf-on conditions. The overall visual quality of the unremarkable views to the south would decrease slightly during leaf-off conditions, and would not decrease appreciably during leaf-on conditions. The impacts from Alternative C5 would be of negligible intensity. The components (a ramp and part of the freeway lanes on the elevated structure) of Alternative C5 that were simulated for KOP 7 and KOP 8 would be slightly lower in elevation than adjacent viewing areas along the south side of Story Hill Parkway. The components would be at least partially screened by roadside vegetation. Where not screened by vegetation, the presence of the components (and vehicles on them) would somewhat lower the existing visual quality of views, but would not reduce the existing visual quality categories by one or more categories. Therefore, the intensity of the impacts of Alternative S2 would be negligible. The elevated components of Alternative S3 would be more visible from KOP 7 and 8 (at least during leaf-off conditions) than the Alternative S2 components would be. Views of Miller Park stadium would remain with both alternatives. Due to the generally unremarkable views to the south, average to between average and moderately low visual quality, neither alternative would have significant impacts to views from the section of Story Hill Parkway adjacent to the Story Hill neighborhood.

Along the east side of the neighborhood, views to the east and southeast are generally more open, and components of the alternatives would be seen from more locations along Story Hill Parkway (or nearby areas). The alternative components would not be out of character with the existing transportation features and large parking lot that are currently part of the views seen from this part of the neighborhood. The alternatives would change some views towards US 41 and the Stadium Interchange, and could somewhat lower visual quality. However, the existing visual quality categories would not be lowered one or more categories with either Alternative S2 or S3. Therefore, the intensity of the impacts of the alternatives would be negligible.

5.4 East Segment Alternatives

The East Segment Alternatives would pass through and/or be visible from Landscape Units 5 (Merrill Park) and 6 (Menomonee Valley). Landscape Unit 6 is industrial in use and character and, as explained in the Existing Conditions Section, is not considered to contain sensitive viewers. No KOPs were selected or simulations developed for Landscape Unit 6. Because much of the portion of Landscape Unit 5 that the alternatives described in the following subsections pass near is a residential area at the south end of the Merrill Park neighborhood, two KOPs from that area were selected for this landscape unit.

Construction of ramps associated with all of the East Segment Alternatives would require the removal of most, or all, of the existing vegetation that grows on the slope between Park Hill Avenue and I-94. The off-alignment alternative would not remove adjacent vegetation east of 32nd Street East because it would be constructed several hundred feet south of the current alignment I-94 alignment.

5.4.1 Alternative E1: Braided Ramps

East- and westbound lanes would be widened south of the Merrill Park area and braided ramps constructed to the north and south of the east- and westbound lanes. The component of this alternative of most concern to views from the Merrill Park area would be the braided ramps that would be built north of, and higher than, the east and westbound lanes. Parts of the braided ramps would be at-grade and other parts would be elevated. The braided ramps would parallel much of Park Hill Avenue. The new ramps would replace existing ramps that provide connections from Park Hill Avenue (to 35th Street). They would be slightly lower in elevation than Park Avenue (elevation differences would vary by location).

KOP 11: 36th Street and Park Hill Avenue - The elevated braided ramp that would be seen at the end of 36th Street, and vehicles passing on it would be clearly seen from this location by residents in the area (see Exhibit B-13 in Attachment 2). It would not change the vividness rating of between moderately low and low. The elevated braided ramp would partially block views of areas in the valley below (the roofs of buildings, glimpses of roadways, etc.), but would not block enough of the view to change the intactness rating or greatly increase the low unity rating. The overall visual quality rating of between moderately low and low would not change. Alternative E1 would have an impact of negligible intensity.

Vividness = 2.3 (existing = 2.5)

Intactness = 2.0 (existing = 2.0)

Unity = 2.5 (existing = 2)

Overall Visual Quality Rating = 2.3 (existing = 2.2)

KOP 12: 32nd Street and Park Hill Avenue - The appearance of the I-94 overpass over 32nd Street would change with the new overpass (see Exhibit B-14 in Attachment 2). The existing single-structure overpass that contains both east- and westbound lanes would be replaced with four separate elevated structures: the west and eastbound lane structures, and two elevated collector-distributor roads. The four overhead structures would expand the bulk and scale of the overpass structure and would somewhat block views of the industrial area currently seen under the existing overpass. The degree of vividness would be slightly reduced, but would remain between moderately low and low. Intactness would remain the same, and the degree of visual unity would decrease slightly from average to between average and moderately low. The overall visual quality would essentially not change and would remain somewhat below moderately low, thus the impact to views from this location would be of negligible intensity.

Vividness = 2.5 (existing = 2.8)

Intactness = 2.0 (existing = 2.0)

Unity = 3.5 (existing = 4.0)

Overall Visual Quality Rating = 2.7 (existing = 2.8)

Alternative E1: Braided Ramps Visual Impact Assessment

From the Merrill Park neighborhood two aspects of this alternative would be noticeable. The braided ramps would be built north of, and higher than, the current east and westbound lanes and would partially block views of areas in the Menomonee Valley below (the roofs of buildings, glimpses of roadways, etc.), but would not block enough of the view to change the intactness rating or greatly increase the low unity rating. Construction of the ramps would require

the removal of most, or all, of the existing vegetation that grows on the slope between Park Hill Avenue and I-94. The types of views seen by people who would drive on components of Alternative E1 would be similar to existing views from I-94 and its associated components. The most noticeable difference would be along the north side of the alternative, where existing vegetation on slopes would be removed. The presence of the braided ramps would be consistent in character with the existing I-94 corridor. Their presence of the removal of the vegetation on the slope above I-94 would not decrease visual quality enough to have impacts of more than negligible intensity. Both the on- and off-alignment alternatives would have the same impact on these KOPs since the alignment does not begin to change until you get east of 31st Street.

5.4.2 Alternative E3: Split Diamond—Frontage Roads

Alternative E3 would develop a split-diamond interchange at 35th and 24th Streets, along with constructing one-way frontage roads adjacent to I-94 and introducing braided ramps between 35th Street and the Stadium interchange. It would involve different configurations of ramps, frontage roads, and collector-distributor roads than Alternative E1, and some of the components would be elevated at higher elevations than their counterparts in Alternative E1. As with Alternative E1, the construction of many of Alternative E3 ramps, frontage roads, and collector-distributor roads would require the removal of most, or all, adjacent vegetation.

KOP 11: 36th Street and Park Hill Avenue - The Alternative E3 elevated structures (a ramp and part of the westbound freeway lanes) that would be seen from KOP 11 would be very similar in appearance and impact to those of Alternative E1 (see Exhibit B-13 in Attachment 2). The presence of the components would partially block views of areas in the valley below (the roofs of buildings, glimpses of roadways, etc.), but the overall existing visual quality rating of between moderately low and low would not change. Alternative E3 would have an impact of negligible intensity to views from KOP 11.

Vividness = 2.3 (existing = 2.5)

Intactness = 2.0 (existing = 2.0)

Unity = 2.0 (existing = 2)

Overall Visual Quality Rating = 2.1 (existing = 2.2)

KOP 12: 32nd Street and Park Hill Avenue - The appearance of the I-94 overpass over 32nd Street would change with the Alternative E3 overpass. The overpass would be similar in appearance to the Alternative E1 overpass (see Exhibit B-14 in Attachment 2). The overall visual quality would essentially not change and the impact of the overpass would be of negligible intensity.

Vividness = 2.5 (existing = 2.8)

Intactness = 2.0 (existing = 2.0)

Unity = 3.5 (existing = 4.0)

Overall Visual Quality Rating = 2.7 (existing = 2.8)

Alternative E3: Split Diamond—Frontage Roads Visual Impact Assessment

Although some of the components of Alternative E3 would be higher in elevation than their counterparts in Alternative E1, impacts to character and visual quality would be essentially the same. The presence of the Alternative 3 braided ramps would be consistent with the character with the existing I-94 corridor and would not lower visual quality. The removal of the vegetation on the slope above I-94 would also be noticed by some viewers. These changes would not decrease visual quality enough to have impacts of more than negligible intensity.

5.4.3 Off-Alignment and On-Alignment Alternative Description and Impact Assessment

East of 32nd Street I-94 the off-alignment would be reconstructed several hundred feet south of its current alignment. Some of the off-alignment components would be potentially seen from some residences in the Merrill Park neighborhood north of Park Hill Avenue (although east of 32nd Street I-94 the components would be several hundred feet farther away). The presence of the components would not change the character of views to south that is heavily influenced by the existing I-94 and the industrial lands in the Menomonee Valley below or lower the visual quality of the views. Impacts would be on negligible intensity.

The on-line alternative would be the same as the off-line alternative except that east of 32nd Street I-94 would remain close to its current alignment and ramps associated with 27th Street would remain as they are. As with the off-line alternative, this alternative would be consistent with the existing character of areas viewed from Merrill Park residences north of Park Hill Avenue that includes the existing I-94 and areas in the Menomonee Valley and would not change the visual quality of the views. The on-line alternative would have impacts that would be of negligible intensity.

5.4.4 East Segment Visual Impact Summary

Parts of all of the braided ramps associated with the east segment alternatives would be higher than current I-94 entrance and exit ramps and would be seen to varying degrees from some residences located at the edge of the Merrill Park neighborhood. In addition, construction of all the east segment alternatives braided ramps would require the removal of most, or all, of the existing vegetation that grows on the slope between Park Hill Avenue and I-94. The removal of vegetation would open up views of I-94 and industrial areas beyond from some areas that are currently screened by vegetation. The mitigation measures that address replanting trees that are identified in Section 7 would be implemented where appropriate. The braided ramps associated with the east segment alternatives would be consistent in character with the character of most of the southern views from this area that include I-94 and industrial areas beyond. The off-line alternative would remove less vegetation and be farther away from Park Hill Avenue because east of 32nd Street I-94 would remain close to its current alignment and ramps associated with 27th Street would remain as they are. All of the East Segment Alternatives would have impacts of negligible intensity.

6 Summary of Visual Impacts to Landscape Units

The following subsections summarize the impacts of the alternatives being considered on each landscape unit.

6.1 Landscape Unit 1: West End

Alternative W2 (C-D roads) would have fewer impacts to visual character and quality than would Alternative W1 (Braided Ramps) because Alternative W1 would be narrower in width along the portion of route west of where lanes would become elevated to converge with the double deck (Alternative C5) than Alternative W2. Neither alternative would reduce visual quality more than one rating in areas with sensitive viewers. The at-grade alternative would essentially maintain the elevation of the existing freeway and slightly increase the width. Therefore, the visual impacts of all the West Segment alternatives would be of negligible intensity under NEPA.

6.2 Landscape Unit 2: Cemeteries

Alternative C2 would pass at-grade through Landscape Unit 2. It would slightly change the appearance of I-94 when viewed by people visiting adjacent cemeteries (sensitive viewers), but would be similar in character to the existing I-94 corridor. Alternative C2 would not reduce the visual quality of views from the cemeteries greatly and its impact would be of negligible intensity. The double-deck options (All Up, Partially Down) associated with the Alternative C5 would introduce long, linear, large-scale elements into Landscape Unit 2. The double deck would block views between the cemeteries on both sides of I-94, which despite the current presence of I-94, do have visual connections that positively contribute to the visual quality of the cemeteries. The presence of the Alternative C5 options double-deck would reduce the existing visual quality categories of all five KOPs in this landscape unit by one or more visual quality categories. The impact of the double-deck on views from the cemeteries would be of substantial intensity under NEPA.

6.3 Landscape Unit 3: Story Hill

Various improvements and components associated with the Stadium Interchange alternatives would be viewed by sensitive residential viewers from the southeastern and eastern edges of the Story Hill neighborhood. Components of both options of Alternative C5 and Alternatives S2 and S3 would pass near residential areas and would be potentially visible to varying degrees. However, because existing views from the four KOPs used to assess potential impacts are unremarkable and often include utilitarian elements such as parking areas and existing transportation infrastructure, the visual presence of the structures related to these alternatives and options would not significantly change the character of the views or lower the visual quality of views from the four KOPs (which ranges from average to less

than moderately low). Impacts from the Stadium Interchange alternatives would be of negligible intensity under NEPA.

6.4 Landscape Unit 4: Miller Park

Landscape Unit 4 has few, if any, sensitive viewers. The existing visual quality of views within this area ranges from average to low. Changes to the visual character and quality of views from areas near Miller Park as a result of alternatives associated with the Stadium Interchange would be minor and of negligible intensity under NEPA.

6.5 Landscape Unit 5: Merrill Park

The East Segment alternatives would have components that would be near the southern edge of the Merrill Park neighborhood and would be seen to varying degrees by residents. Elevated structures associated with Alternatives E1 and E3 would have the most potential to impact views from this area. However, because many of the views in the area already include views of transportation infrastructure and many are from elevated areas, the introduction of components associated with the East Segment alternatives would be consistent with the character of much of the landscape unit. The alternatives components that could be seen within the landscape unit would not lower the existing average to low visual quality of views in this landscape. The intensity of the impacts of the two East Segment alternatives would be negligible.

Some of the structures associated with Alternatives E1 (off-alignment and on-alignment) and E3 would be seen from some residences in the Merrill Park neighborhood north of Park Hill Avenue. The removal of existing vegetation along I-94 with these alternatives would open up some views to the south that are currently screened by the vegetation. The presence of the structures would be similar to that of the existing freeway that can be seen from areas that are not screened by vegetation and would not greatly lower existing visual quality or change the types of views of the industrial valley seen to the south from this area.

6.6 Landscape Unit 6: Menomonee Valley

Landscape Unit 6 is primarily industrial and commercial in use and character and has few, if any, sensitive viewers. The existing visual quality of views within this landscape unit ranges from moderately low to low. Changes to the visual character and quality of views within this area from alternatives associated with the Stadium Interchange Alternatives or East Segment Alternatives would be of negligible intensity under NEPA.

7 Mitigation Methods to Consider

The following mitigation measures to consider will not be part of the Final VIA (or the Draft VIA submitted for review). The ideas presented in the following subsections are intended to start a discussion of what mitigation measures might be appropriate. If specific measures are approved, they can be added to the simulations and impact assessments (with the measures in place) can be made. If vegetative screening is to be simulated, it is common to simulate what the vegetation will look like in the short term (5 years is often used) and longer term (15+ years).

7.1 West Segment Alternatives

Although neither Alternative W1 nor W2 would lower visual quality enough to have impacts of substantial intensity under NEPA, both alternatives would be seen by nearby residents. Some of the residents would likely be concerned about views of some of the components of the alternatives (particularly elevated structures). The following mitigation measures could be considered to improve views towards the alternatives for residents:

- At the ends of streets that dead-end against I-94, install screening or plant vegetation to screen or block views.
- Where there is room in the right-of-way of the alternative structures near residences, consider installing screening or planting vegetation to screen or block views.
- To reduce the size and contrast of large-scale features such as the structure wall depicted in Exhibit B-3 in Attachment 2, plant trees next to the structures to “soften” views of it, or between the structures and viewers to screen/block views of it.

- Consider encouraging American Transmission Co. to continue to use the same types of support structures they are currently using in the cleared right-of-way.

7.2 Cemetery Segment Alternatives

The taller elements being considered for the Alternative C5 options would have impacts to views from various cemeteries adjacent to I-94 that would be of substantial intensity. The impacts would be greater on the north side of I-94, where the height of structures compared to the adjacent grade would be higher than on the south side.

Mitigation measures to consider include the following:

- The use concrete colors, patterns and textures in a way that diminishes the apparent size of double-deck support walls and breaks up the long, horizontal nature of the walls.
- If possible, use a different type of support structure (rather than walls) to support the upper deck to avoid long, horizontal walls.
- Consider the design of air flow openings in walls (“windows”) of the double-deck support walls to diminish the double-deck support walls mass and long, horizontal nature and create architectural interest —similar to what is used near the Marquette Interchange.
- Use trees/shrubs where possible to screen; diminish the size of north-facing walls of the double-deck.
- On the lower, south-facing wall on the south side of I-94, consider a combination plants and screens or fences to break up the horizontal nature of the wall and to screen-block views of the elevated structures and vehicles travelling on them. Fences, screens, or art work could be placed along the top edge of the top of the structure. It may be necessary to relocate some graves to get enough room to plant trees, etc.

7.3 Stadium Interchange Alternatives

The two alternatives being considered near Story Hill would not lower visual quality enough to have impacts of substantial intensity under NEPA. They would, however, be potentially seen by nearby residents, at least during leaf-off conditions. The following mitigation measure would alleviate potential views of elevated structures and moving vehicles:

- Plant evergreen shrubs and/or small trees in the area south of Story Parkway to block leaf-off condition views.
- Consider reinforcing a feeling of community by working with community/neighbors to devise a roster of potential plants.

7.4 East Segment Alternatives

Mitigation measures same as West Segment Alternatives.

8 References

Federal Highway Administration. 1988. *Visual Impact Assessment for Highway Projects*. FHWA Publication HI-88-054. Available online: <http://www.dot.ca.gov/ser/downloads/visual/FHWAVisualImpactAssmt.pdf>.

Southeastern Wisconsin Regional Planning Commission. 2006. *2035 Regional Transportation System Plan (Planning Report No. 49)*.

9 Glossary

Dominant. The degree to which a theme or feature in the viewed landscape commands viewer attention. Size, shape, color, or other characteristics can contribute to the degree of visual dominance that a theme or feature has..

Intactness. See *Visual Quality* definition.

Key observation point (KOP). A specific location within a landscape unit that is selected to represent views within that landscape unit. A viewpoint is also selected so that the effects of a proposed alternative on visual quality can be assessed.

Key view. The specific view from a viewpoint or KOP that is used to describe existing visual conditions (and quality) and is also used to analyze the effects of a proposed action on visual quality. A viewpoint or KOP can have a number of views from it, or even a 360-degree view. The key view is a subset of the views from the viewpoint that is oriented towards a part of the total view that could be affected by a proposed alternative. The photograph used to represent the key view is taken with a 35-millimeter camera using a 50-millimeter focal length, which is the camera lens setting that is commonly used in visual assessment because it closely resembles the viewing angle (or cone) of the human eye.

Leaf-off conditions. Describes conditions or times of year when deciduous vegetation has lost its foliage.

Leaf-on conditions. Describes conditions or times of year when deciduous vegetation has foliage.

Scale. Proportionate size of elements in their landscape as compared with components in their surroundings.

Significant adverse effect. An effect that would lower the total visual quality rating two or more points.

Photo-simulation (simulation). Digitally enhanced images based on photographs taken of selected views. The images illustrate the probable changes due to the project and relative scales of the existing and proposed features.

Silhouetted. Elevated objects that extend above the horizon and “into” the sky from a viewing location are considered to be silhouetted against the sky. Silhouetted objects have the potential to be quite visible because they become part of the horizon and attract more visual attention than if they were located in front of objects (such as trees or hills) that would serve as the background and define the horizon.

Study area. The project area follows I-94 from west to east approximately 2.85 miles through central Milwaukee. The portion of the I-94 corridor that is examined in this VIA as the study area consists of areas from which changes associated with the alternatives could potentially be seen. The distance varies from adjacent to the changes to several blocks away or more.

Total visual quality rating. An average of the rating of the three characteristics (vividness, intactness, and unity) that define visual quality.

Unity. See *Visual Quality* definition.

Viewers. People who have views of or from the project. Viewers are usually discussed in terms of general categories of activities, such as residents, workers, recreationists (for example, park users, boaters, or bicyclists), pedestrians, or motorists (that is, both commuters and leisure travelers), and are referred to as “viewer groups.”

Viewer sensitivity. The response of viewers looking at and from the project, both before and after the project. Low viewer sensitivity results when there are few viewers who experience a defined view or they are not particularly concerned about the view. Viewer sensitivity is expressed at low, medium, and high levels. High viewer sensitivity results when there are viewers who are very aware of, and concerned about, changes to the viewed landscape. Views of an area for long periods of time (or duration) and frequency accentuates sensitivity among viewers with high sensitivity. Low viewer sensitivity typically occurs when viewers have little concern or awareness of the viewed landscape and/or when views are short in duration (people pass by an area) and frequency.

Views. With the FHWA methodology, views of concern include views *of* the project from important viewing areas like nearby neighborhoods or bodies of water and views *from* the project (for example views from a new bridge or roadway). Views can be expansive such as from high viewpoints; linear such as along road corridors; or limited such as along a corridor or river channel.

Viewpoint. See *Key Observation Point* definition.

Viewshed. Areas from which a project can be seen and, conversely, areas from which viewers on a transportation project like a bridge or road can see.

Visual character. An impartial description of the viewed landscape. Character consists of, and is defined by, relationships between existing visible natural and built landscape features. The relationships are considered in terms of dominance, scale, diversity, and continuity. Features and resources that contribute to describing visual character may include the following:

- Landforms: types, gradients, and scale
- Vegetation: types, size, maturity, and continuity
- Land uses: height, bulk, scale, and architectural detail of associated buildings and ancillary site uses
- Transportation facilities: types, sizes, scale, and directional orientation
- Overhead utility structures and lighting: types, sizes, and scale
- Open space: type (for example, parks, reserves, greenbelts, and undeveloped land), extent, and continuity
- Water bodies, historic structures, and downtown skylines
- Apparent “grain” or textures, such as the size and distribution of structures and unbuilt properties or open spaces of the landscape
- Apparent upkeep and maintenance

Visual quality. An assessment of the composition of the character-defining features for selected views. This assessment asks: Is this particular view common or dramatic? Is it a pleasing composition (with a mix of elements that seem to belong together) or not (with a mix of elements that either do not belong together or are eyesores and contrast with the other elements in the surroundings)? Visual quality is evaluated in terms of vividness, intactness, and unity. These three characteristics are described as follows:

- **Vividness** is the degree of drama, memorability, or distinctiveness of the landscape components. It is composed of the following four elements that usually influence the degree of vividness:
 - Landform
 - Vegetation
 - Water features
 - Human-made elements
- **Intactness** is a measure of the visual integrity of the natural and human-built landscape and its freedom from encroaching elements. This factor can be present in well-kept urban and rural landscapes, as well as in natural settings. High intactness means that the landscape is free of eyesores and is not broken up by features that appear to be out of place. Intactness is composed of the following two primary elements that influence the degree of intactness:
 - Development
 - Encroachment
- **Unity** is the degree of visual coherence and compositional harmony of the landscape considered as a whole. High unity frequently attests to the careful design of individual components and their relationship in the landscape.

Visual Quality Ratings. For this VIA, the elements and characteristics discussed are rated between 1 (low) and 7 (high). The visual quality ratings and their descriptors are as follows:

- 1 – Very Low
- 2 – Low
- 3 – Moderately Low
- 4 – Average
- 5 – Moderately High
- 6 – High
- 7 – Very High

The ratings of the three characteristics (vividness, intactness, and unity) are then averaged to determine a total visual quality rating, which is also between 1 (low) and 7 (high). For example, if a view had a vividness rating of 6, an intactness rating of 7, and a unity rating of 5, the three ratings would be added and divided by 3, which would produce an average total visual quality rating of 6.

Vividness. See *Visual Quality* definition.

Exhibits

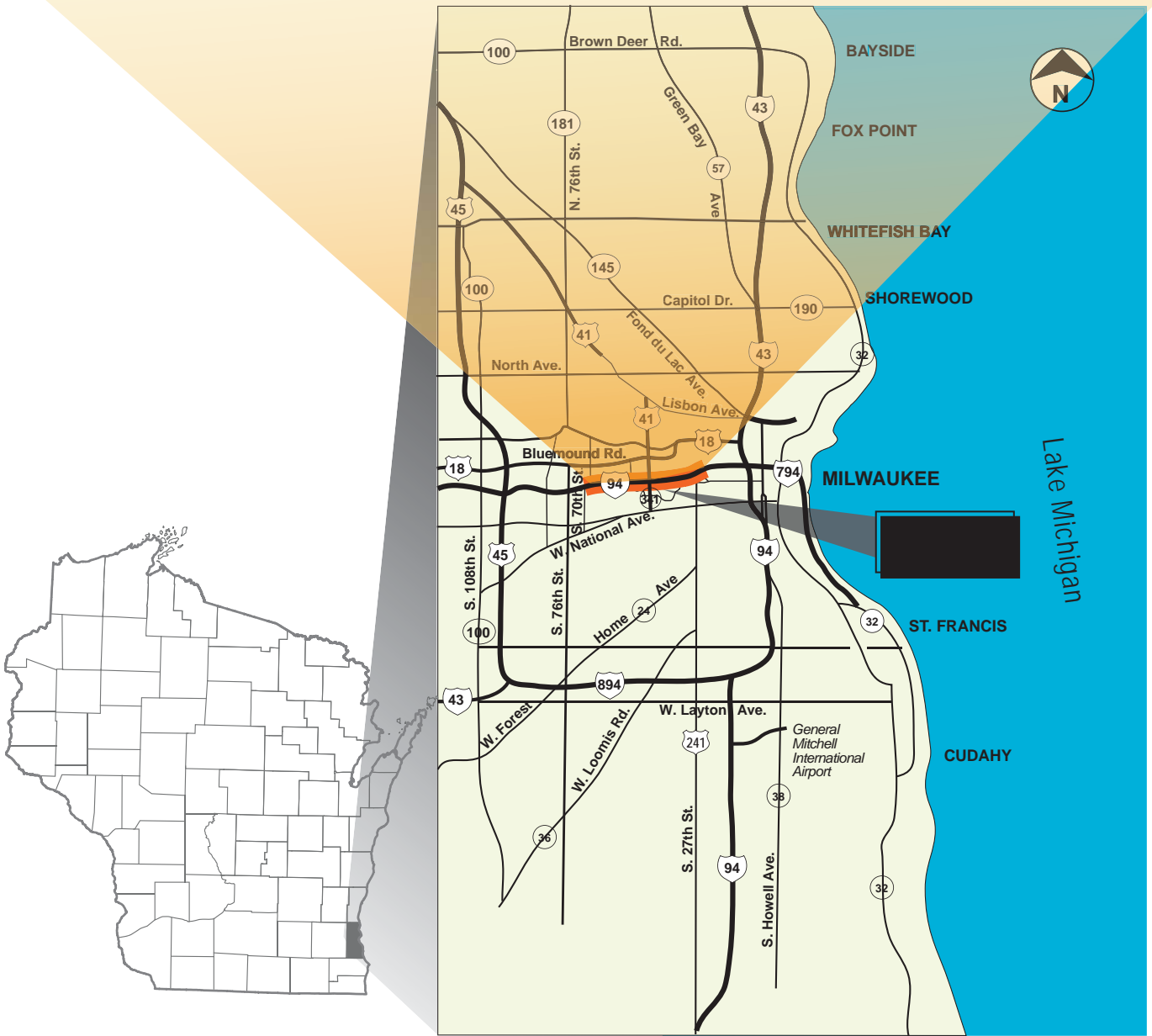
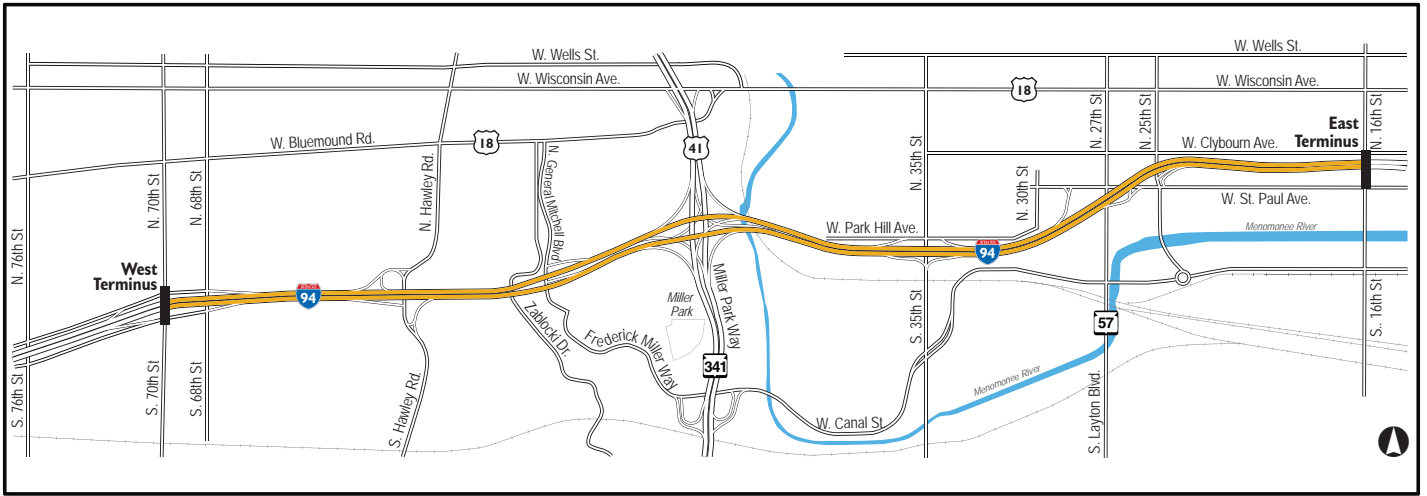
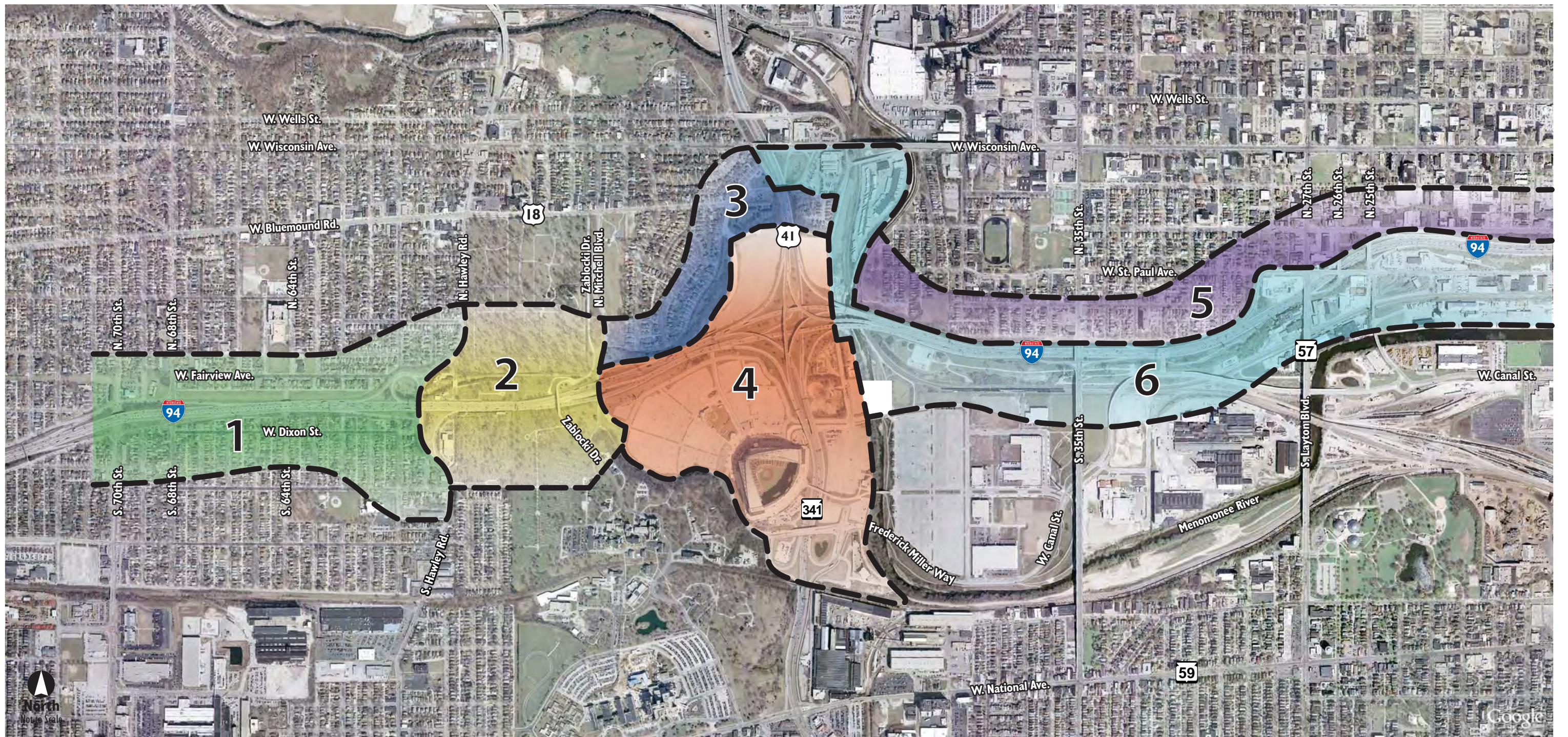


Exhibit I
Project Location Map



- LEGEND**
- Landscape Units**
- 1. West End
 - 2. Cemeteries
 - 3. Story Hill
 - 4. Miller Park
 - 5. South Merrill Park
 - 6. Menomonee Valley




Attachment 1
Existing Conditions Photographs



LEGEND

 Location of Simulation Direction

 North



LEGEND

 Location of Simulation Direction





Exhibit A-3: Location 1 (Landscape Unit 1) From eastbound W. Kearny Street just west of S. 68th Street looking east at I-94 overpass over S. 68th Street and the east-bound onramp to I-94.



Exhibit A-4: Location 2 (Landscape Unit 1) From eastbound I-94 east of S. 68th Street looking east.



Exhibit A-5: Location 3 (Landscape Unit 1) From S. 65th Street south of W. Fairview Avenue looking south towards the 138 kV electrical transmission line right-of-way embankment.



Exhibit A-6: Location 4 (Landscape Unit 1) From S. 64th Street north of W. Dixon Street looking north at I-94 overpass over 64th Street.



Exhibit A-7: Location 5 (Landscape Unit 1) From S. 61st Street north of W. Dixon Street looking north at the end of the street adjacent to I-94.



Exhibit A-8: Location 6 (Landscape Unit 2) From S. Hawley Court southeast of the Hunger Task Force building looking north at end of street adjacent to I-94.



Exhibit A-9: Location 7 (Landscape Unit 2) From S. Hawley Court northeast of the Hunger Task Force building looking northwest at I-94 . Note vehicles on I-94 .



Exhibit A-10: Location 8 (Landscape Unit 2) From Beth Hamedrosh Hagodel Cemetery access road looking southwest at I-94 and the Spring Hill Cemetery mausoleum (the building on the right side of photograph adjacent to I-94) . .



Exhibit A-11: Location 9 (Landscape Unit 2) From the north Wood National Cemetery parcel looking south at I-94 and the main part of Wood National Cemetery.



Exhibit A-12: Location 10 (Landscape Unit 2) From the Calvary Cemetery access road north of the _kV electrical transmission line corridor looking southeast.



Exhibit A-13: Location 11 (Landscape Unit 2) From Zablocki Drive bridge over I-94 looking west over I-94. Note the main part of Wood National Cemetery on left (south) side of I-94 and the north parcel on the right (north) side.



Exhibit A-14: Location 12 (Landscape Unit 2) From main part of Wood National Cemetery looking north at I-94 and north parcel of the cemetery.



Exhibit A-15: Location 13 (Landscape Unit 3) From intersection of N. Story Parkway and N. Pinecrest Street looking west along N. Story Parkway. Note the vegetation along the south side of the parkway that provides varying degrees of screening.



Exhibit A-16: Location 14 (Landscape Unit 3) From N. Story Parkway looking south towards Miller Park.



Exhibit A-17: Location 15 (Landscape Unit 3) From the intersection of N. Story Parkway and Yount Drive looking south at Miller Park and along N. Story Parkway.



Exhibit A-18: Location 16 (Landscape Unit 3) From northwest quadrant of the intersection of N. Story Parkway and W. Bluemound Road looking east along W. Bluemound Road towards its overpass over WIS 41..



Exhibit A-19: Location 17 (Landscape Unit 3) From southwest quadrant of W. Wisconsin Avenue/US 41 interchange looking east along W. Wisconsin Avenue towards the WIS 41 overpass.



Exhibit A-20: Location 18 (Landscape Unit 4) From Helfaer Field in the Miller Park parking lot south of I-94 looking northwest at I-94 and Story Hill behind it.



Exhibit A-21: Location 19 (Landscape Unit 4): From the intersection of Frederick Miller Way/W. Canal Street and Selig Drive (and the Hank Aaron Trail) looking northwest towards I-94.



Exhibit A-22: Location 20 (Landscape Unit 5) From N. 37th Street north of W. Park Hill Avenue looking south over I-94.



Exhibit A-23: Location 21 (Landscape Unit 5) From N. 34th Street north of W. Park Hill Avenue looking south at W. Park Hill Avenue and exit of off-ramp from I-94.

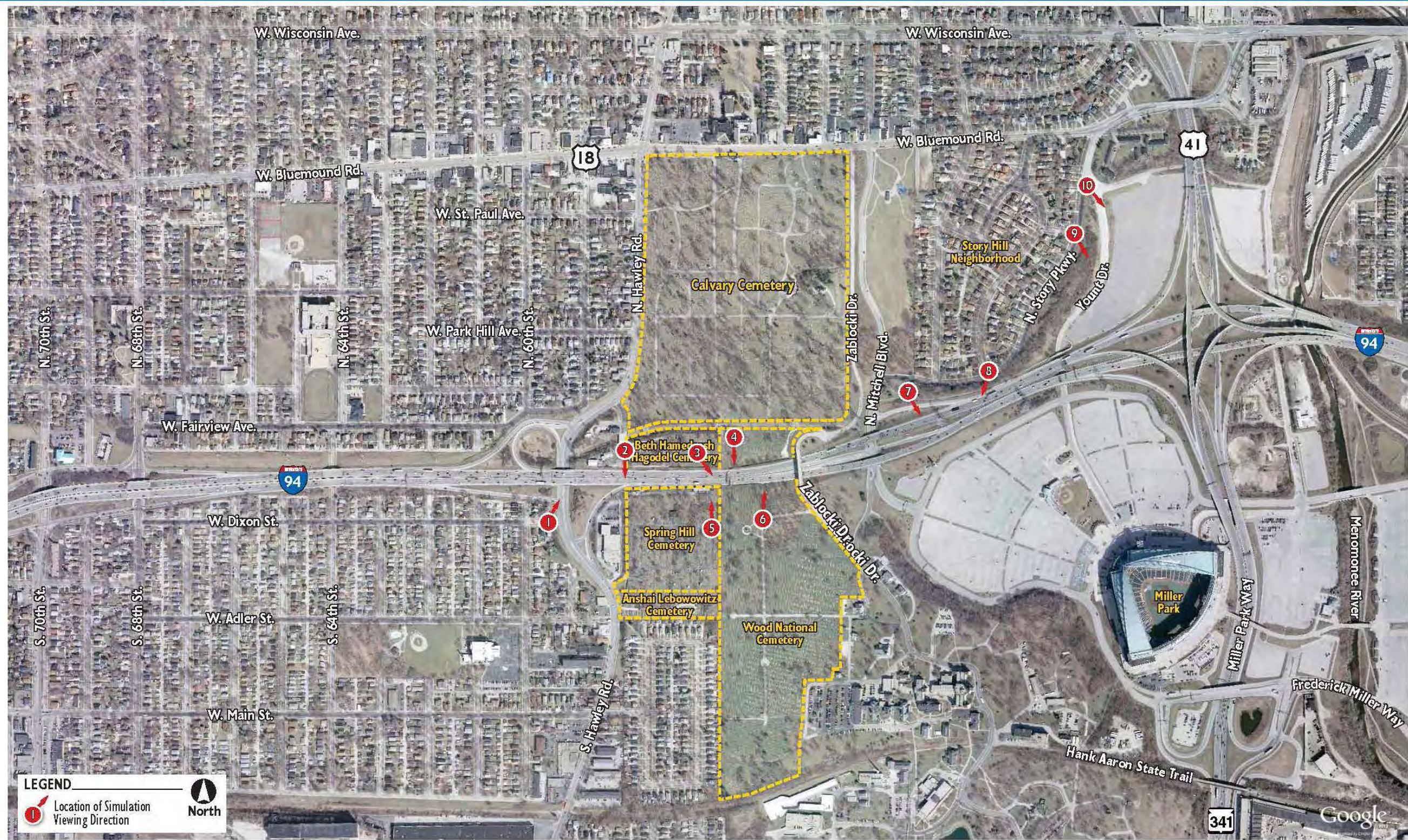


Exhibit A-24: Location 22 (Landscape Unit 6) From the intersection of N. 32nd Street and W. Canal Street looking north at I-94 overpass over N. 32nd Street.



Exhibit A-25: Location 23 (Landscape Unit 6) From W. Greves Street west of 27th Street looking northeast at I-94 retaining wall and S. 27th Street bridge over I-94.

Attachment 2
Simulations of Alternatives



U.S. Department of Transportation
Federal Highway
Administration

16030513109341MKE B-1_Location_of_Simulations_West_v2.ai 05.31.13.mxd

Exhibit B-1
Location of Simulations (west of interchange)

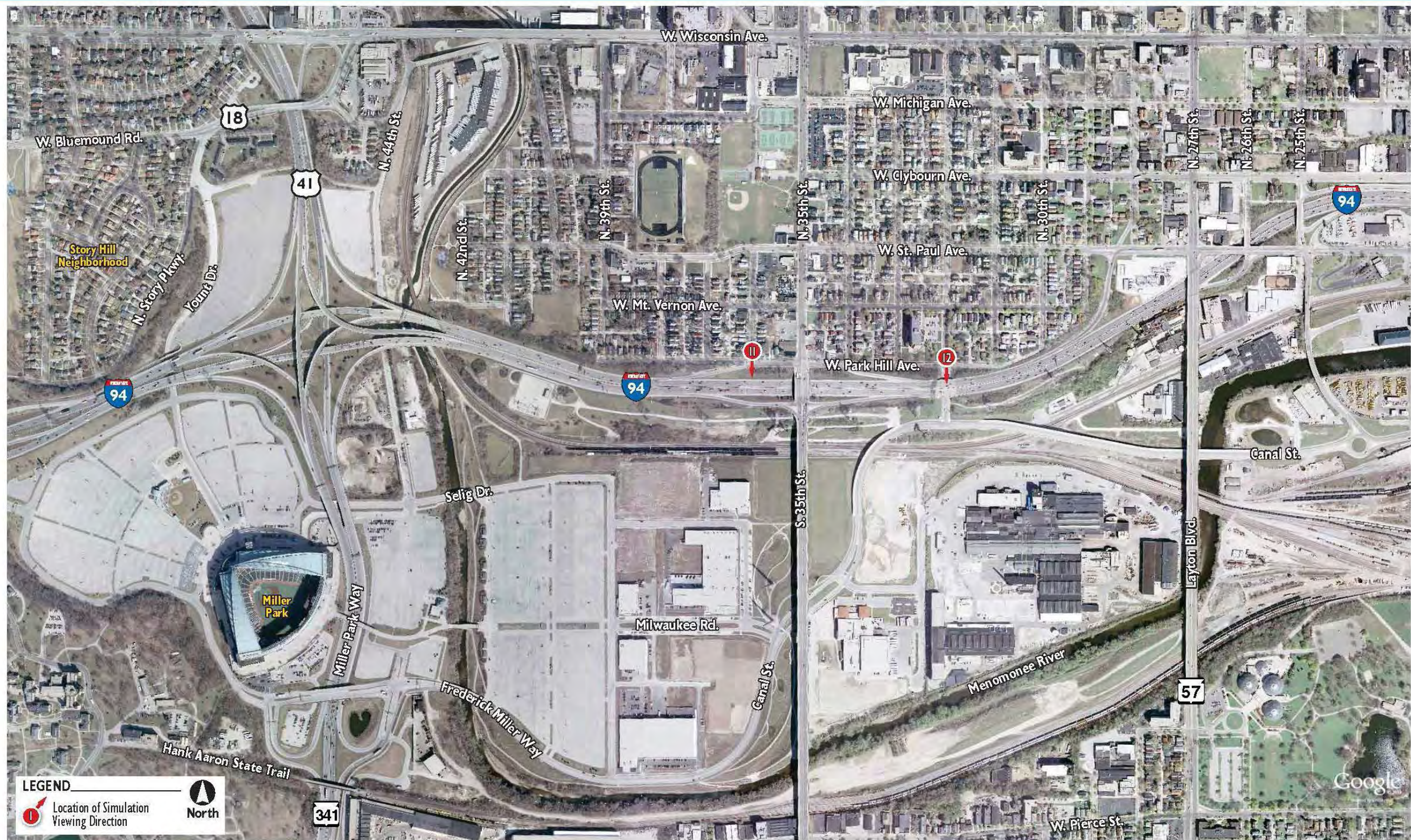


Exhibit B-3. KOP 1



Existing Condition: From Dixon Street west of Hawley Road looking northeast at I-94 overpass.



Simulation: Alternative W2 (C-D Roads).

Exhibit B-4. KOP 2



Existing Condition: From Dana Court adjacent to Beth Hamedrosh Hagodol Cemetery looking south towards I-94 and Spring Hill Cemetery (note: Spring Hill Cemetery mausoleum – building behind white Beth Hamedrosh Hagodol Cemetery sign).



Simulation: Modified Alternative C5 (Double-Deck) with the All Up option.

Exhibit B-5. KOP 3



Existing Condition: From east end of Beth Hamedrosh Hagodol Cemetery looking southeast at fence screening view of I-94 freeway lanes and main part of Wood National Cemetery.

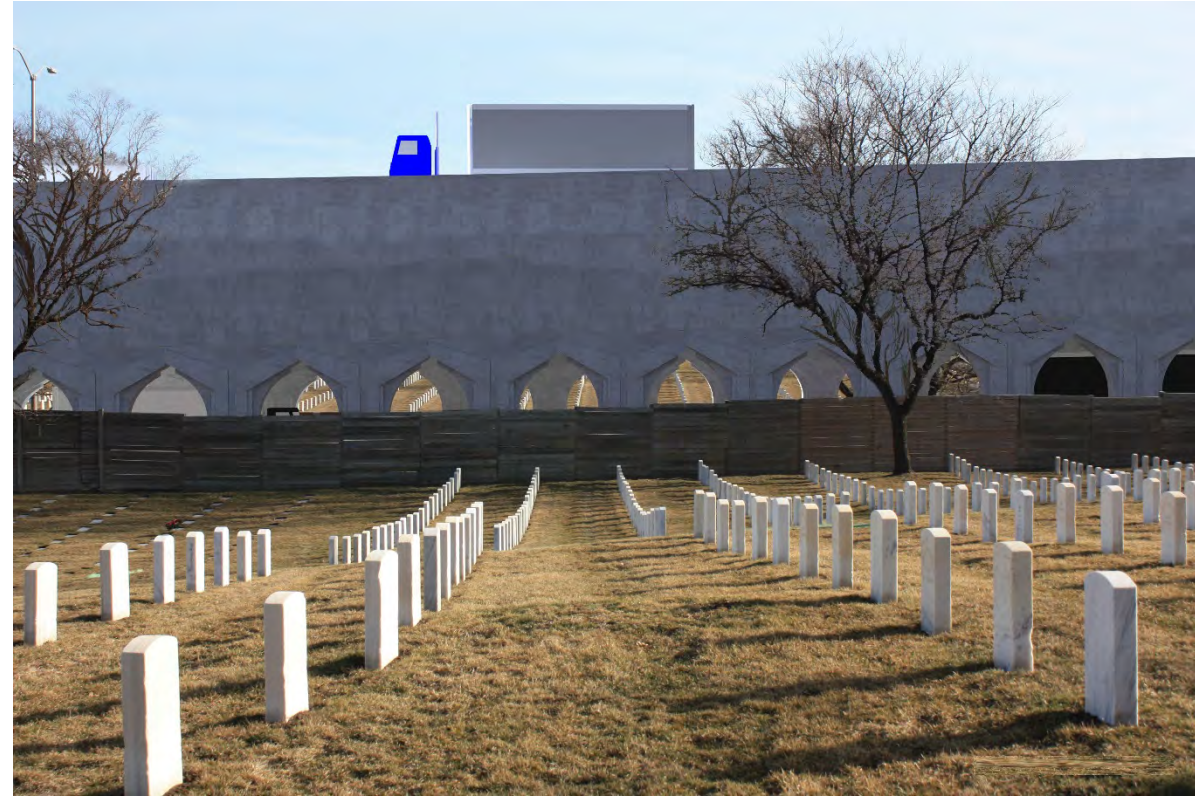


Simulation: Modified Alternative C5 (Double-Deck) with the All Up option.

Exhibit B-6. KOP 4



Existing Condition: From Wood National Cemetery (north side of I-94) looking south at I-94 and main part of Wood National Cemetery beyond.



Simulation B: Modified Alternative C5 (Double Deck) with the Partial Down option and openings on the lower deck.



Simulation A: Modified Alternative C5 (Double Deck) with the All Up option.



Simulation B: Modified Alternative C5 (Double Deck) with the All Up option and openings on the lower deck.

Exhibit B-7. KOP 5



Existing Condition: From Spring Hill Cemetery (east end next to Wood National Cemetery) looking north over I-94 at north parcel of Wood National Cemetery.



Simulation: Modified Alternative C5 (Double-Deck) with the All Up option.

Exhibit B-8. KOP 6



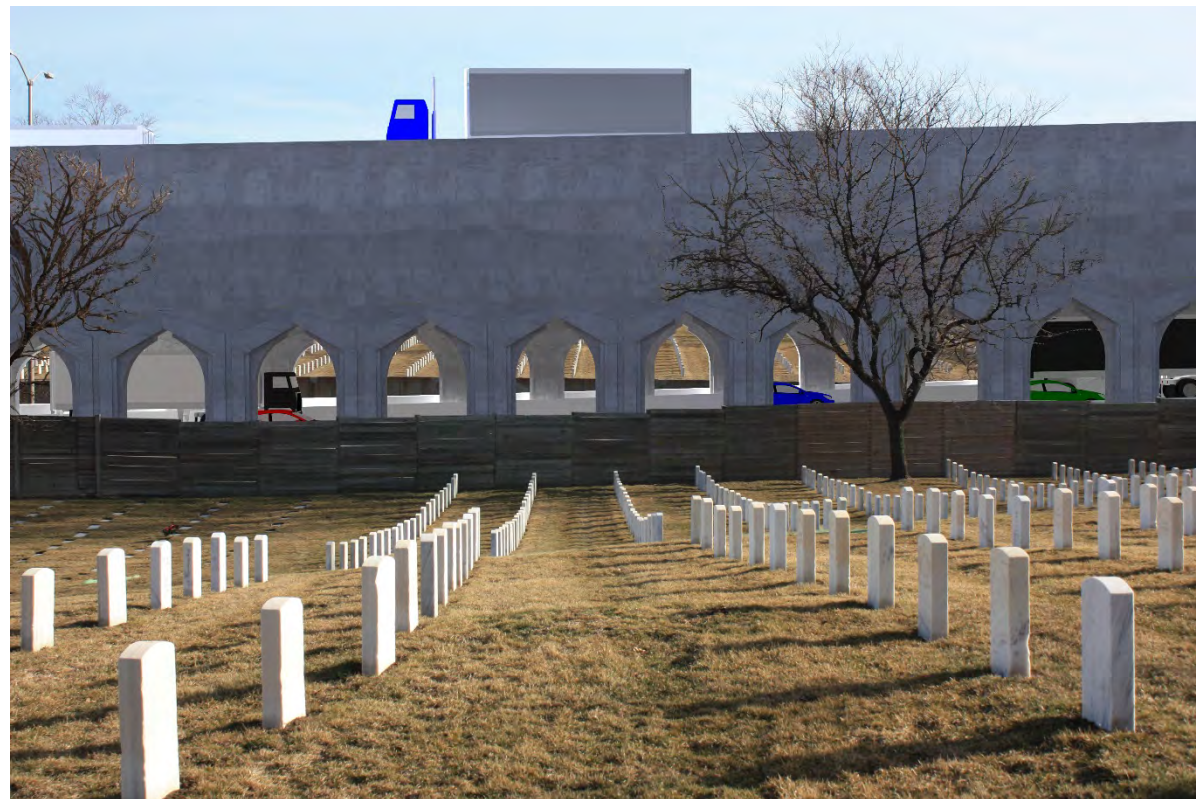
Existing Condition: From Wood National Cemetery (south side of I-94) looking north at north parcel of Wood National Cemetery.



Simulation B: Modified Alternative C5 (Double-Deck) with the Partial Down option and openings on the lower deck.



Simulation A: Modified Alternative C5 (Double-Deck) with All Up option.



Simulation C: Modified Alternative C5 (Double-Deck) with All Up option and openings on the lower deck.

Exhibit B-8. KOP 6 (continued)



Existing Condition: From Wood National Cemetery (south side of I-94) looking north at north parcel of Wood National Cemetery.



Simulation E: Modified Alternative C2 (At Grade) with connection to VA from Mitchell Boulevard south of I-94.



Simulation D: Modified Alternative C2 (At Grade) with no connection to VA from Mitchell Boulevard south of I-94.

Exhibit B-9. KOP 7



Existing Condition: From Story Parkway looking southeast towards Miller Park and parking areas.



Simulation: Modified Alternative C5 (Double Deck) with the Partial Down option.



Simulation: Modified Alternative C5 (Double Deck) All Up option.

Exhibit B-10. KOP 8



Existing Condition: From Story Parkway and Pinecrest Street looking south at I-94 sign and Miller Park parking areas.



Simulation: Modified Alternative C5 (Double Deck) with All Up option.

Exhibit B-11. KOP 9



Existing Condition: From N. Story Parkway looking southeast over Yount Drive towards the US 41/I-94 interchange, Miller Park parking areas, and the northeastern edge of Miller Park.



Simulation: Modified Alternative S3 (Single Point).

Exhibit B-12. KOP 10



Existing Condition: From Yount Drive (just east of Story Parkway) looking southeast towards entrance to Miller Park, parking areas, and the I-94/US 41 interchange.



Simulation: Modified Alternative S3 (Single Point).

Exhibit B-13. KOP 11



Existing Condition: From 36th Street north of Park Hill Avenue looking south.



Simulation: Alternative E1 (Braided Ramps).

Exhibit B-14. KOP 12



Existing Condition: From 32nd Street north of Park Hill Avenue looking south at I-94 overpass.



Simulation: Alternative E1 (Braided Ramps).

Attachment 3

Key Observation Point Visual Quality Rating Tables

| Visual Resource Survey: | | Existing Conditions | |
|--|------------|--|--|
| KOP Location: West Dixon Avenue | | Viewpoint: KOP 1 | |
| Vividness | | | |
| Feature | Score* | Notes | |
| Landform | 3 | Slight topographic change seen. | |
| Vegetation | 3 | Sparse - most are trees on north side of I-94. | |
| Human-Made | 3 | The tall vertical 138 kV support structure is somewhat vivid from this location, but in reality is one of a number of structures along the transmission line alignment. | |
| Overall | 3.0 | | |
| Intactness | | | |
| Overall | 2 | Structures seen from this location a utilitarian in use and appearance. 138 kV electrical transmission line structure is a large, vertical visual intrusion as is the overpass (but to a lesser degree because it has a horizontal form that is less visually contrasting than the support structure). | |
| Unity | | | |
| Overall | 3 | The long horizontal form of the I-94 overpass provides a bit of visual unity to this view, despite the variety of very different appearing visual elements that detract from the overall visual unity of this view. | |
| Overall Visual Quality Score | 2.7 | | |

*Score Key:

1 - Very Low; 2 - Low; 3 - Moderately Low; 4 - Average; 5 - Moderately High; 6 - High; 7 - Very High

| Visual Resource Survey: | | Alt: B2 (C-D Roads) | | With Project | |
|--|------------|--|--|--------------|--|
| KOP Location: West Dixon Avenue | | Viewpoint: KOP 1 | | | |
| Vividness | | | | | |
| Feature | Score* | Notes | | | |
| Landform | 3 | | | | |
| Vegetation | 2 | Less vegetation is evident. | | | |
| Human-Made | 2.5 | Large scale of new components and their domination of the view are not distinctive and look like other similar freeways at similar distances. | | | |
| Overall | 2.5 | The freeway lanes (and crash barriers lining them) and the support/retaining wall would slightly increase the vividness rating because of their large-scale, horizontal characteristics. | | | |
| Intactness | | | | | |
| Overall | 1 | New components are large-scale visual intrusions. | | | |
| Unity | | | | | |
| Overall | 2.5 | New components block views of areas behind I-94 and their appearance and scale diminish unity when compared to residence (in this residential area). | | | |
| Overall Visual Quality Score | 2.0 | The freeway lanes (and crash barriers lining them) and the support/retaining wall would slightly decrease the vividness rating because of their large-scale, horizontal characteristics. These same characteristics that create a somewhat memorable view would be considered visual intrusions that would reduce the existing low intactness to very low. The visual unity rating would decrease from moderately low to between moderately low and low. The overall visual quality of the view would be reduced from between moderately low and low, to low | | | |

*Score Key:

1 - Very Low; 2 - Low; 3 - Moderately Low; 4 - Average; 5 - Moderately High; 6 - High; 7 - Very High

| Visual Resource Survey: | | Existing Conditions |
|---|--------|---|
| KOP Location: Dana Ct. - Beth HH Cemetery | | Viewpoint: KOP 2 |
| Vividness | | |
| Feature | Score* | Notes |
| Landform | 5 | See terrain beyond I-94 |
| Vegetation | 5 | Trees and lawns memorable. |
| Human-Made | 4 | Headstones are memorable. Freeway, vehicles, and chainlink fence detract. |
| Overall | 4.7 | |
| Intactness | | |
| Overall | 3.5 | |
| Unity | | |
| Overall | 3 | Freeway detracts from unity of views to cemetery beyond. |
| Overall Visual Quality Score | 3.7 | |

*Score Key:
1 - Very Low; 2 - Low; 3 - Moderately Low; 4 - Average; 5 - Moderately High; 6 - High; 7 - Very High

| Visual Resource Survey: | | Modified Alt: C5 - All Up Option - Solid Wall |
|---|--------|--|
| KOP Location: Dana Ct. - Beth HH Cemetery | | Viewpoint: KOP 2 |
| Vividness | | |
| Feature | Score* | Notes |
| Landform | 1 | Views blocked. |
| Vegetation | 1 | Views blocked. |
| Human-Made | 2 | Views blocked. |
| Overall | 1.3 | |
| Intactness | | |
| Overall | 2 | Views blocked. |
| Unity | | |
| Overall | 2 | Views blocked. |
| Overall Visual Quality Score | 1.8 | Note that air flow openings in elevated structure would slightly increase visual connection between both sides of freeway and architectural detailing on openings and shape of openings would improve overall visual quality ratings by slightly increasing vividness and unity ratings. |

*Score Key:
1 - Very Low; 2 - Low; 3 - Moderately Low; 4 - Average; 5 - Moderately High; 6 - High; 7 - Very High

| Visual Resource Survey: | | Existing Conditions |
|--------------------------------|------------|--|
| KOP Location: Beth HH Cemetery | | Viewpoint: KOP 3 |
| Vividness | | |
| Feature | Score* | Notes |
| Landform | 5 | Hill visible beyond I-94. |
| Vegetation | 5 | Trees and lawn are somewhat vivid. |
| Water Feature | NA | |
| Human-Made | 5 | Cemeteries are positive elements, fencing and freeway signs detract. |
| Overall | 5.0 | |
| Intactness | | |
| Overall | 4 | Fencing and signs somewhat detract from overall view intactness. |
| Unity | | |
| Overall | 4.5 | Views over freeway contribute to unity. |
| Overall Visual Quality Score | 4.5 | |

*Score Key:
1 - Very Low; 2 - Low; 3 - Moderately Low; 4 - Average; 5 - Moderately High; 6 - High; 7 - Very High

| Visual Resource Survey: | | Alt. C5 - All Up Option |
|--------------------------------|------------|--|
| KOP Location: Beth HH Cemetery | | Viewpoint: KOP 3 |
| Vividness | | |
| Feature | Score* | Notes |
| Landform | 1 | Views blocked. |
| Vegetation | 3 | Remaining tree somewhat screens elevated structure. |
| Water Feature | NA | |
| Human-Made | 2 | Views blocked and elevated structure is a large scale element. Condition of fencing more apparent. |
| Overall | 2.0 | |
| Intactness | | |
| Overall | 2.5 | Elevated structure is a large scale intrusion that blocks views. |
| Unity | | |
| Overall | 3 | Visual connection lost. |
| Overall Visual Quality Score | 2.5 | Note that air flow openings in elevated structure would slightly increase visual connection between both sides of freeway and architectural detailing on openings and shape of openings would improve overall visual quality ratings by slightly increasing vividness and unity ratings. |

*Score Key:
1 - Very Low; 2 - Low; 3 - Moderately Low; 4 - Average; 5 - Moderately High; 6 - High; 7 - Very High

| Visual Resource Survey: | | Existing Conditions | |
|---|------------|---|--|
| KOP Location: Wood National Cemetery (North of I-94) | | Viewpoint: KOP 4 | |
| Landscape Unit: | | | |
| Vividness | | | |
| Feature | Score* | Notes | |
| Landform | 5.5 | Slope south of I-94 very apparent. | |
| Vegetation | 5.5 | Lawn and trees create a uniform appearance, except where I-94 intrudes. | |
| Water Feature | NA | | |
| Human-Made | 5.5 | Historic features visible on each side of I-94 and vehicles passing by on it. | |
| Overall | 5.5 | | |
| Intactness | | | |
| Overall | 4.5 | | |
| Unity | | | |
| Overall | 5 | | |
| Overall Visual Quality Score | 5.0 | | |

*Score Key:
1 - Very Low; 2 - Low; 3 - Moderately Low; 4 - Average; 5 - Moderately High; 6 - High; 7 - Very High

| Visual Resource Survey: | | Alt. C5 - All Up Option - Solid Wall | |
|---|------------|--|--|
| KOP Location: Wood National Cemetery (North of I-94) | | Viewpoint: KOP 4 | |
| Landscape Unit: | | | |
| Vividness | | | |
| Feature | Score* | Notes | |
| Landform | 1 | View of slope blocked. | |
| Vegetation | 2.5 | Views of area beyond wall blocked. Still have lawn and trees north of I-94. | |
| Water Feature | NA | | |
| Human-Made | 2.5 | Views of areas south of I-94 blocked. Headstones of graves still interesting features, but presence of elevated structure detracts. | |
| Overall | 2.0 | | |
| Intactness | | | |
| Overall | 2.5 | | |
| Unity | | | |
| Overall | 2.5 | | |
| Overall Visual Quality Score | 2.3 | Note that air flow openings in elevated structure would slightly increase visual connection between both sides of freeway and architectural detailing on openings and shape of openings would improve overall visual quality ratings by slightly increasing vividness and unity ratings. | |

*Score Key:
1 - Very Low; 2 - Low; 3 - Moderately Low; 4 - Average; 5 - Moderately High; 6 - High; 7 - Very High

| Visual Resource Survey: | | Existing Conditions | |
|---|------------|---|--|
| KOP Location: Spring Hill Cemetery | | Viewpoint: KOP 5 | |
| Landscape Unit: | | | |
| Vividness | | | |
| Feature | Score* | Notes | |
| Landform | 5 | Rolling terrain is visible on both sides of I-94. | |
| Vegetation | 5 | Trees and lawns in both cemeteries quite visible. | |
| Water Feature | NA | | |
| Human-Made | 5 | Headstones in both cemeteries quite evident. | |
| Overall | 5.0 | | |
| Intactness | | | |
| Overall | 4.5 | Average to moderately high visual connection and intactness between both sides of I-94. . | |
| Unity | | | |
| Overall | 4.5 | | |
| Overall Visual Quality Score | 4.7 | | |

*Score Key:
1 - Very Low; 2 - Low; 3 - Moderately Low; 4 - Average; 5 - Moderately High; 6 - High; 7 - Very High

| Visual Resource Survey: | | Alt C5 - All Up Option | |
|---|------------|--|--|
| KOP Location: Spring Hill Cemetery | | Viewpoint: KOP 5 | |
| Landscape Unit: | | | |
| Vividness | | | |
| Feature | Score* | Notes | |
| Landform | 1.5 | View of terrain beyond I-94 blocked. | |
| Vegetation | 3 | Tops of trees north of elevated structure can be seen as well as trees and lawn in Spring Hill Cemetery. | |
| Water Feature | NA | | |
| Human-Made | 3.5 | Although visual connection with Wood National Cemetery lost, headstones are still interesting features. Elevated structure and vehicles passing by detract from view. | |
| Overall | 2.7 | | |
| Intactness | | | |
| Overall | 2.5 | Elevated structure intrudes on views. | |
| Unity | | | |
| Overall | 3 | Connection with cemeteries north of I-94 lost. | |
| Overall Visual Quality Score | 2.7 | Note that air flow openings in elevated structure would slightly increase visual connection between both sides of freeway and architectural detailing on openings and shape of openings would improve overall visual quality ratings by slightly increasing vividness and unity ratings. | |

*Score Key:
1 - Very Low; 2 - Low; 3 - Moderately Low; 4 - Average; 5 - Moderately High; 6 - High; 7 - Very High

| Visual Resource Survey: | | Existing Conditions | |
|---|------------|--|--|
| KOP Location: Wood National Cemetery (south of I-94) | | Viewpoint: KOP 6 | |
| Vividness | | | |
| Feature | Score* | Notes | |
| Landform | 4.5 | Rolling terrain on both sides of I-94 very apparent. | |
| Vegetation | 5 | Lawns and heavy presence of trees on both sides of I-94. | |
| Human-Made | 4 | Cemetery components and I-94, vehicles passing on it, and an overcrossing compete for attention. | |
| Overall | 4.5 | | |
| Intactness | | | |
| Overall | 3.5 | Freeway, vehicles, and overpass intrude on this view. | |
| Unity | | | |
| Overall | 4.5 | Despite freeway, vehicles and overpass, higher than average unity between cemeteries. | |
| Overall Visual Quality Score | 4.2 | | |

*Score Key:
1 - Very Low; 2 - Low; 3 - Moderately Low; 4 - Average; 5 - Moderately High; 6 - High; 7 - Very High

| Visual Resource Survey: | | Alt C5 - All Up Option | |
|---|------------|---|--|
| KOP Location: Wood National Cemetery (south of I-94) | | Viewpoint: KOP 6 | |
| Vividness | | | |
| Feature | Score* | Notes | |
| Landform | 3 | Rolling terrain north of I-94 no longer seen. | |
| Vegetation | 4 | Views of lawns north of the elevated structure blocked but tops of trees can still be seen. Vegetation on south side of I94 still contributes to view and existing trees would somewhat soften presence of elevated structure by somewhat screening it. | |
| Human-Made | 2 | Elevated structure intrudes on view and vehicles on top deck and ramp are quite apparent. | |
| Overall | 3.0 | | |
| Intactness | | | |
| Overall | 2.5 | Elevated structure and ramp would be intrusions closer to viewers from this location. | |
| Unity | | | |
| Overall | 3 | Visual connection lost. | |
| Overall Visual Quality Score | 2.8 | Note that air flow openings in elevated structure would slightly increase visual connection between both sides of freeway and architectural detailing on openings and shape of openings would improve overall visual quality ratings by slightly increasing vividness and unity ratings. | |

*Score Key:
1 - Very Low; 2 - Low; 3 - Moderately Low; 4 - Average; 5 - Moderately High; 6 - High; 7 - Very High

| Visual Resource Survey: | | Existing Conditions |
|---|------------|--|
| KOP Location: N. Story Hill Parkway (west) | | Viewpoint: KOP 7 |
| Vividness | | |
| Feature | Score* | Notes |
| Landform | 4.5 | During leaf-off conditions, buildings in the valley beyond I-94 and hillsides beyond can be seen. |
| Vegetation | 5 | Vegetation along side the parkway as well as vegetation on the hillsides to the south south (seen during leaf-off conditions) are important parts of this view. |
| Water Feature | NA | |
| Human-Made | 5.5 | Miller Park is an interesting visual element. Signs associated with I-94 and the roofs of commercial - industrial buildings in the valley below I-94 detract from the view during leaf-off conditions. |
| Overall | 5.0 | |
| Intactness | | |
| Overall | 3.5 | The view includes a variety of viewed elements that taken together have lower than average intactness. |
| Unity | | |
| Overall | 3.5 | |
| Overall Visual Quality Score | 4.0 | |

*Score Key:
1 - Very Low; 2 - Low; 3 - Moderately Low; 4 - Average; 5 - Moderately High; 6 - High; 7 - Very High

| Visual Resource Survey: | | Alt C5 - All Up Option |
|---|------------|--|
| KOP Location: N. Story Hill Parkway (west) | | Viewpoint: KOP 7 |
| Vividness | | |
| Feature | Score* | Notes |
| Landform | 2.5 | The elevated structure will block views of the buildings in the valley below I-94 and the lower slopes of the hillsides beyond, particularly during leaf-off conditions. |
| Vegetation | 4 | Vegetation on hillsides to the southeast somewhat blocked by elevated structure during leaf-off conditions. |
| Water Feature | NA | |
| Human-Made | 3.5 | The lower part of Miller Park will be blocked by the elevated structure, as will views of the roofs of commercial - industrial buildings in the valley below I-94. |
| Overall | 3.3 | |
| Intactness | | |
| Overall | 3 | Views of the elevated structure would replace views of the roofs of commercial - industrial buildings. |
| Unity | | |
| Overall | 3 | Overall visual unity would be somewhat lowered due to the presence of the elevated structure. |
| Overall Visual Quality Score | 3.1 | Note that the ratings for the C5 - Partial Down Option would be very similar to the ratings for the All-Up option because the elevations of the two options would be very similar. The ratings for the Modernization Alternative S2 (system interchange – low-speed, free-flow) and Modernization Alternative S3 (single-point interchange with free-flow ramps from I-94) alternatives would be slightly higher than the All-Up option because they would be lower in elevation. The elevated structures associated with the S2 and S3 alternatives and vehicles on them would still be seen (particularly during leaf-off conditions) but would be lower in the view. |

*Score Key:
1 - Very Low; 2 - Low; 3 - Moderately Low; 4 - Average; 5 - Moderately High; 6 - High; 7 - Very High

| Visual Resource Survey: | | Existing Conditions |
|---|------------|--|
| KOP Location: N. Story Hill Parkway and N. Pinecrest Street | | Viewpoint: KOP 8 |
| Vividness | | |
| Feature | Score* | Notes |
| Landform | 3 | Get an indication that there may be a valley beyond I-94. |
| Vegetation | 3.5 | Parkway side vegetation most prominent. |
| Human-Made | 3 | I-94 signs most visible human-made element. |
| Overall | 3.2 | |
| Intactness | | |
| Overall | 3 | A variety of objects seen during leaf-off conditions including I-94 sign, tops of commercial - industrial buildings in valley beyond I-94. |
| Unity | | |
| Overall | 3.5 | |
| Overall Visual Quality Score | 3.2 | |

*Score Key:
1 - Very Low; 2 - Low; 3 - Moderately Low; 4 - Average; 5 - Moderately High; 6 - High; 7 - Very High

| Visual Resource Survey: | | Alt 5 - All Up Option |
|---|------------|---|
| KOP Location: N. Story Hill Parkway and N. Pinecrest Street | | Viewpoint: KOP 8 |
| Vividness | | |
| Feature | Score* | Notes |
| Landform | 3 | Little to no change. |
| Vegetation | 3.5 | Vegetation next to parkway not impacted. |
| Human-Made | 2.5 | |
| Overall | 3.0 | Elevated structure and vehicles travelling on it could be seen, particularly during leaf-off conditions. |
| Intactness | | |
| Overall | 3 | Little change, I-94 signs no longer seen. |
| Unity | | |
| Overall | 3 | Visual connection with valley below during leaf-off conditions no longer maintained with elevated structure. |
| Overall Visual Quality Score | 3.0 | Note that the ratings for the S2 - Partial Down Option would be very similar to the ratings for the All-Up option because the elevations of the two options would be very similar. The ratings for the Modernization Alternative S2 (system interchange - low-speed, free-flow) and Modernization Alternative S3 (single-point interchange with free-flow ramps from I-94) alternatives would be slightly higher than the All-Up option because they would be lower in elevation. The elevated structures associated with the S2 and S3 alternatives and vehicles on them would still be seen (particularly during leaf-off conditions) but would be lower in the view. |

*Score Key:
1 - Very Low; 2 - Low; 3 - Moderately Low; 4 - Average; 5 - Moderately High; 6 - High; 7 - Very High

| Visual Resource Survey: | | Existing Conditions | |
|--|------------|--|--|
| KOP Location: N. Story Parkway over Yount Drive | | Viewpoint: KOP 9 | |
| Landscape Unit: | | | |
| Vividness | | | |
| Feature | Score* | Notes | |
| Landform | 4 | Some difference in terrain elevation can be seen. | |
| Vegetation | 3 | Scattering of trees with some lawn areas. | |
| Human-Made | 3.5 | Utilitarian elements (freeway interchange, paved parking areas, electrical transmission line support structures, etc) seen from this view. | |
| Overall | 3.5 | | |
| Intactness | | | |
| Overall | 2.5 | | |
| Unity | | | |
| Overall | 4.5 | | |
| Overall Visual Quality Score | 3.5 | | |

*Score Key:
1 - Very Low; 2 - Low; 3 - Moderately Low; 4 - Average; 5 - Moderately High; 6 - High; 7 - Very High

| Visual Resource Survey: | | Alt S3 (Single Point) | |
|--|------------|---|--|
| KOP Location: N. Story Parkway over Yount Drive | | Viewpoint: KOP 9 | |
| Landscape Unit: | | | |
| Vividness | | | |
| Feature | Score* | Notes | |
| Landform | 4 | Little to no change. | |
| Vegetation | 3 | Little to no change. | |
| Human-Made | 3.5 | Replacing human-made utilitarian structures with new structure. | |
| Overall | 3.5 | | |
| Intactness | | | |
| Overall | 3 | Replacing multiple existing interchange elements with the proposed interchange would slightly improve intactness. | |
| Unity | | | |
| Overall | 4 | Slight decrease in unity. | |
| Overall Visual Quality Score | 3.5 | | |

*Score Key:
1 - Very Low; 2 - Low; 3 - Moderately Low; 4 - Average; 5 - Moderately High; 6 - High; 7 - Very High

| Visual Resource Survey: | | Existing Conditions | |
|------------------------------|--------|---|--|
| KOP Location: Yount Drive | | Viewpoint: KOP 10 | |
| Vividness | | | |
| Feature | Score* | Notes | |
| Landform | 3 | Can see some topographic relief. | |
| Vegetation | 1.5 | Little vegetation present. | |
| Human-Made | 3 | Utilitarian landscape composed of parking areas, freeway components. | |
| Overall | 2.5 | | |
| Intactness | | | |
| Overall | 2.5 | View composed of many different elements with paved areas being the most prevalent. | |
| Unity | | | |
| Overall | 3 | | |
| Overall Visual Quality Score | 2.7 | | |

*Score Key:
1 - Very Low; 2 - Low; 3 - Moderately Low; 4 - Average; 5 - Moderately High; 6 - High; 7 - Very High

| Visual Resource Survey: | | Alt: S3 (Single Point) | |
|------------------------------|--------|------------------------|--|
| KOP Location: Yount Drive | | Viewpoint: KOP 10 | |
| Vividness | | | |
| Feature | Score* | Notes | |
| Landform | 3 | Little to no change. | |
| Vegetation | 1.5 | Little to no change. | |
| Human-Made | 3 | Little to no change. | |
| Overall | 2.5 | Little to no change. | |
| Intactness | | | |
| Overall | 2 | | |
| Unity | | | |
| Overall | 3 | Little to no change. | |
| Overall Visual Quality Score | 2.5 | | |

*Score Key:
1 - Very Low; 2 - Low; 3 - Moderately Low; 4 - Average; 5 - Moderately High; 6 - High; 7 - Very High

| Visual Resource Survey: | | Existing Conditions | |
|--|--------|---|--|
| KOP Location: N 36nd Street (near W. Park Hill Avenue) | | Viewpoint: KOP 11 | |
| Vividness | | | |
| Feature | Score* | Notes | |
| Landform | 2.5 | Roofs of industrial - commercial buildings in valley beyond I-94 can be seen to give a sense of topographic change. | |
| Vegetation | 2 | Except for nearby trees, vegetation not an important component of this view. | |
| Human-Made | 3 | Street and electrical transmission line support structure most visible human-made components. | |
| Overall | 2.5 | | |
| Intactness | | | |
| Overall | 2 | | |
| Unity | | | |
| Overall | 2 | | |
| Overall Visual Quality Score | 2.2 | | |

*Score Key:
1 - Very Low; 2 - Low; 3 - Moderately Low; 4 - Average; 5 - Moderately High; 6 - High; 7 - Very High

| Visual Resource Survey: | | Alt E1 (Braided Ramps) | |
|--|--------|---|--|
| KOP Location: N 36nd Street (near W. Park Hill Avenue) | | Viewpoint: KOP 11 | |
| Vividness | | | |
| Feature | Score* | Notes | |
| Landform | 2 | Elevated structure would impinge on views of roofs. | |
| Vegetation | 2 | Little to no change | |
| Human-Made | 3 | Top of elevated structure will be seen. | |
| Overall | 2.3 | | |
| Intactness | | | |
| Overall | 2 | Little to no difference in intactness with a taller I-94 structure. | |
| Unity | | | |
| Overall | 2.5 | By blocking views of the roofs of commercial - industrial buildings, would be slightly more visual unity. | |
| Overall Visual Quality Score | 2.3 | | |

*Score Key:
1 - Very Low; 2 - Low; 3 - Moderately Low; 4 - Average; 5 - Moderately High; 6 - High; 7 - Very High

| Visual Resource Survey: | | Existing Conditions | |
|--|------------|--|--|
| KOP Location: N 32nd Street (near W. Park Hill Avenue) | | Viewpoint: KOP 12 | |
| Vividness | | | |
| Feature | Score* | Notes | |
| Landform | 3.5 | Topographic relief evident. | |
| Vegetation | 2 | Minor part of view. | |
| Human-Made | 3 | | |
| Overall | 2.8 | | |
| Intactness | | | |
| Overall | 2 | Mix of elements and land uses results in low intactness. | |
| Unity | | | |
| Overall | 4 | Has a strong transportation corridor character and sense of unity. | |
| Overall Visual Quality Score | 2.9 | | |

*Score Key:
1 - Very Low; 2 - Low; 3 - Moderately Low; 4 - Average; 5 - Moderately High; 6 - High; 7 - Very High

| Visual Resource Survey: | | Alternative E1 (Braided Ramps) | |
|--|------------|---|--|
| KOP Location: N 32nd Street (near W. Park Hill Avenue) | | Viewpoint: KOP 12 | |
| Vividness | | | |
| Feature | Score* | Notes | |
| Landform | 3 | Banks of overpass would not be visible | |
| Vegetation | 1.5 | Trees would be removed. | |
| Human-Made | 3 | Overpass would be more extensive but would allow more light along N. 32nd Street. | |
| Overall | 2.5 | | |
| Intactness | | | |
| Overall | 2 | Little to no change in intactness. | |
| Unity | | | |
| Overall | 3.5 | Little to no change in unity. | |
| Overall Visual Quality Score | 2.7 | | |

*Score Key:
1 - Very Low; 2 - Low; 3 - Moderately Low; 4 - Average; 5 - Moderately High; 6 - High; 7 - Very High




U.S. Department
of Transportation
**Federal Highway
Administration**

Memorandum

Subject: INFORMATION: Revised FHWA
Assessment of Adverse Effects for the I-
94 East – West Corridor Project from
16th St to 70th St, Milwaukee, WI (Project
ID 1060-27-00)

Date: September 24, 2014

From: Bethaney Bacher-Gresock 
Major Projects Environmental Manager
Madison, WI

In Reply Refer To:
HDA-WI

To: Dobra Payant
Deputy Project Manager, SE Region
Waukesha, WI

The Federal Highway Administration–Wisconsin Division Office (FHWA), in cooperation with Wisconsin Department of Transportation (WisDOT), is developing an environmental impact statement (EIS) for a proposed project on I-94 from 16th Street to 70th Street in Milwaukee, Wisconsin. This memorandum provides FHWA's effect determinations pursuant to 36 CFR 800.5. FHWA submitted the first draft of this memorandum to the consulting parties for review and comment in April 2014. This revised memorandum reflects the comments received on the first draft as well as subsequent consultation meetings.

FHWA, in consultation with the State Historic Preservation Office (SHPO) and other consulting parties, identified the project's Area of Potential Effect (APE) and the following historic properties within it.¹

- Calvary Cemetery
- Northwestern Branch, National Home for Disabled Volunteer Soldiers Historic District (Soldiers' Home Historic District)
- Northwestern Branch, National Home for Disabled Volunteer Soldiers National Historic Landmark (Soldiers' Home NHL)
- Soldiers' Home Reef National Historic Landmark
- Story Hill Residential District #1
- Story Hill Residential Districts #2 and #3

¹ FHWA Memorandum: *Historic Properties On or Eligible for the National Register within the APE for the I-94 East-West Corridor from 16th St to 70th St* (October 8, 2013, APE map revised March 2014 to clarify historic boundaries for the Northwestern Branch, National Home for Disabled Volunteer Soldiers National Historic Landmark, and the National Register listed Historic District). APE map revised March 2014 is attached. Brief summaries describing the characteristics and significance of the historic properties were provided as part of the October 15, 2013 consultation meeting.

The purpose of the proposed project is to maintain I-94 as a key link in the local, state, and national transportation network; to address obsolete roadway design to improve safety (including replacing left-hand entrances and exits and providing proper weaving distances between exit and entrance ramps); to replace deteriorated pavement and infrastructure (bridges); and to improve capacity by accommodating current and future traffic volumes at an acceptable level of service.

Through the alternatives screening process, the following project alternatives, located within the APE, were retained for detailed study for the I-94 East-West Corridor West Segment (70th Street to Stadium Interchange):

- At-grade alternative: Add a fourth lane in each direction, split-diamond interchange at 68th/70th Streets with either no Hawley Road interchange or a half interchange at Hawley Road (entrance/exit ramps to and from the west), and narrow lanes and shoulders through the cemetery area.
- Double Deck alternative: Add a fourth lane in each direction, split diamond interchange at 68th/70th Streets, full Hawley Road interchange, and a double deck (all up or partially down) through the cemetery area.

These alternatives, along with the No-Build alternative, are evaluated in detail in the I-94 East-West Corridor Draft EIS.

As part of the Section 106 consultation process, FHWA invited consulting parties to share their views² on the potential effects the proposed I-94 project may have on the historic properties located in the APE pursuant to 36 CFR 800.4(d)(2) and 36 CFR 800.5. According to 36 CFR 800.5(a)(1), "an adverse effect is found when the undertaking may alter, directly or indirectly, *any of the characteristics that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association*" (emphasis added).

FHWA, in consultation with the SHPO, Advisory Council on Historic Preservation (ACHP), National Park Service (NPS) as it pertains to NHLs, the Department of Veterans Affairs (VA), and other consulting parties, has applied the criteria of adverse effect, considered the views of consulting parties identified in *I-94 East-West Corridor Study Potential Effects on Historic Resources* (February 26, 2014), and determined that the proposed project, regardless of the alternative selected, would have No Adverse Effect on the following properties:

- Soldiers' Home Reef National Historic Landmark
- Story Hill Residential District #1

The project would not acquire, alter, or change the characteristics that qualify the properties for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

The proposed project would have No Adverse Effect on the Soldiers' Home Reef National Historic Landmark which was listed on the National Register and designated as a landmark in 1993. The historical significance of the 400-million-year-old Silurian Period fossil reef derives from its discovery in the 1830s by Wisconsin's first scientist, Increase A. Lapham, and by James Hall who recognized and described it in 1861 as an ancient fossil reef. The reef was one of the first described reefs in North America and the world. Thomas Chamberlin used the reef and others in formulating his paleoecological and sedimentological model of reef development. The proposed project would not

² Consulting party views were recorded in the *I-94 East-West Corridor Study Potential Effects on Historic Resources* memo dated February 13, 2014 and in the Section 106 Consultation meeting minutes from July 15, 2013, to February 13, 2014.

acquire property or otherwise alter or change the character or setting of the historic reef in a manner that diminishes its historic integrity.

The proposed project would have No Adverse Effect on the National Register eligible Story Hill Residential District #1. The historic significance of the district is derived from its period Craftsman and Colonial Revival style homes distinguished by their stucco cladding. The Story Hill neighborhood was developed when Albert & Alice Story registered a plat in 1911. The period of significance spans 1909–1936. The proposed project would not have direct impacts on Story Hill Residential District #1 or otherwise alter or change the character or setting of district in a manner that diminishes its historic integrity.

FHWA, in consultation with the SHPO, ACHP, NPS, the VA, and other consulting parties, has applied the criteria of adverse effect, considered the views of consulting parties and determined that the At-grade alternative would have No Adverse Effect and the Double Deck alternative would have a potential Adverse Effect on the following properties:

- Calvary Cemetery
- Story Hill Residential Districts #2 and #3

The historical significance of Calvary Cemetery is derived from its function as the final resting place of a number of influential individuals who made outstanding contributions to the history of Milwaukee and for embodying the “high style” qualities of Late Victorian and Classical Revival architecture. The period of significance is from 1857 to about 1922.

The At-grade alternative would not require acquisition of any Calvary Cemetery property. The noise levels would remain roughly the same as existing conditions. The roadway under this alternative would be slightly elevated (up to 3-5 feet) compared to the existing interstate, but the viewshed from the cemetery would have only minor modifications. The At-grade alternative would not alter or change the character of the property in a manner that diminishes the historic integrity of the property’s location, design, setting, materials, workmanship, feeling, or association. The At-grade alternative would have No Adverse Effect on Calvary Cemetery.

The Double Deck alternative could have an Adverse Effect on the National Register-eligible Calvary Cemetery. There would be no direct impacts to the property from the project, and no cemetery property would be acquired. However, there could be indirect impacts to the cemetery from the visual impacts of an elevated interstate. The integrity of location, design, materials, and association would not be altered or diminished by the project. The location of the cemetery would remain intact; the design and materials of the landscape and the architecture would be retained; and the cemetery would continue to be associated with the influential Milwaukee individuals. However, the visual impacts could diminish the integrity of setting and feeling. The viewshed of Calvary Cemetery includes the interstate, but under the Double Deck alternative, the view from the cemetery would be altered and obstructed by the new elevated roadway, which would be 25 to 30 feet taller than the existing roadway.

In summary, the At-grade alternative would have No Adverse Effect on Calvary Cemetery. The Double Deck alternative would have a potential Adverse Effect on Calvary Cemetery due to the visual impacts that could diminish the integrity of setting and feeling of the property.

The period of significance for the National Register-eligible Story Hill Residential Districts #2 and #3 spans from 1924–1963, with much of the construction occurring in the 1920s. The historic significance of the district is derived from its Period Revival styles, which are well represented in the form of Period Colonial Revival, Tudor Revival, and Mediterranean Revival styles and features examples of several well-regarded Milwaukee architects and builders, including Hugo C. Haeuser, Roy J. Jacobs, and the firm of George Schley & Sons. Of the 153 properties within the district, only three are considered noncontributing. Some of the contributing properties on the southeastern side of the

Story Hill Residential Districts #2 and #3 currently have views of the existing, highly urban I-94 corridor, the Stadium Interchange with elevated ramps, and the associated transportation infrastructure. Residents of the district have noise concerns because of the freeway and nearby Miller Park, home of the Milwaukee Brewers. These properties have coexisted with the I-94 corridor for more than 50 years, since the freeway opened in 1963.

As part of the alternative development process, FHWA and WisDOT are carrying forward alternatives within the view from Story Hill Residential Districts #2 and #3 that hold the northern freeway right-of-way line at its existing location, maintain I-94 westbound travel lanes and shoulder in their existing location, maintain the vegetative screening near Story Parkway, and move all proposed freeway improvements farther away. (The proposed Stadium Interchange flyover ramp would be roughly 1,300 feet away from the district.)

The At-grade alternative would not require acquisition of any property in Story Hill Residential Districts #2 and #3. Under the At-grade alternative, the freeway would be about the same elevation it is today adjacent to the historic district. Existing views towards I-94 and beyond would essentially remain the same. Noise levels from the At-grade alternative, if selected, are expected to result in a 1-2 decibel increase within the district, according to the noise analysis conducted as part of the EIS. Although an increase of less than 3 decibels is generally imperceptible to the human ear, the existing noise levels in the district are high enough that a noise wall is reasonable and feasible at that location under WisDOT policy. FHWA has determined that the increase in noise levels within the historic district would not be an adverse effect under Section 106. If a noise wall were installed to mitigate current or future noise levels, the wall itself may constitute an adverse effect on the district because of visual obstruction of the viewshed from the historic district properties.

The At-grade alternative would not alter or change the character of the property in a manner that diminishes the historic integrity of the property's location, design, setting, materials, workmanship, feeling, or association. The At-grade alternative would have No Adverse Effect on Story Hill Residential Districts #2 and #3.

Noise levels from the Double Deck alternative, if selected, are expected to result in a 0 to 6 decibel increase within the district, according to the noise analysis conducted as part of the EIS. As previously noted, the existing noise levels in the district are high enough that a noise wall is reasonable and feasible at that location under WisDOT policy. FHWA has determined that the increase in noise levels within the historic district would not be an adverse effect under Section 106. If a noise wall were installed to mitigate current or future noise levels, the wall itself may constitute an adverse effect on the district because of visual obstruction of the viewshed from the historic district properties.

The Double Deck alternative would not require acquisition of any property in Story Hill Residential Districts #2 and #3. The Double Deck alternative would raise the freeway 14-feet (Partially Down option) to 20-feet (All Up option) at the west end of the district. Under the At-grade and the Double Deck alternatives an eastbound exit ramp from I-94 to US 41/Miller Park Way at the Stadium Interchange would add additional roadway infrastructure that would be roughly 30 feet higher than the existing interchange. This ramp would be roughly 1,300 feet from the district boundary. Under the Double Deck alternative, the new exit ramp and the elevated double deck structures through the cemetery area would be visible from parts of the historic district. The visual impacts of the Double Deck alternative (All Up or Partially Down options) to the district could diminish the integrity of setting and feeling of the historic property. There would be no direct impacts to the district, so it would retain integrity of design, materials, workmanship, and association.

In conclusion, the Double Deck alternative would have a potential Adverse Effect to Story Hill Residential Districts #2 and #3. The visual changes to the district could alter or change the setting and feeling of the district in a manner that could diminish its historic integrity. The At-grade alternative would have No Adverse Effect on the Story Hill Residential Districts #2 and #3.

FHWA, in consultation with the SHPO, ACHP, NPS, the VA, and other consulting parties, has applied the criteria of adverse effect, considered the views of consulting parties identified in the February 13, 2014 *I-94 East-West Corridor Study Potential Effects on Historic Resources* document, and determined that the At-grade alternative could be designed to have to have a No Adverse Effect and the Double Deck alternative would have an Adverse Effect on the following properties:

- Northwestern Branch, National Home for Disabled Volunteer Soldiers Historic District
- Northwestern Branch, National Home for Disabled Volunteer Soldiers National Historic Landmark

The Soldiers' Home NHL and Soldiers' Home Historic District are essentially the same historic property with some slight differences between the historical boundaries and periods of historic significance. The attached exhibit shows the boundaries of the NHL and Historic District. The period of significance for the Soldiers' Home NHL is 1866-1930 and 1867-1955 for the Soldiers' Home Historic District. The National Asylum for Disabled Soldiers, as it was originally named, was established in 1865. The Milwaukee Soldiers' Home campus is the only one of the three original Soldiers' Home sites to have its majestic Soldiers' Home intact, and it is also the only one with the majority of its surrounding recuperative village remaining. The Soldiers' Home NHL houses 25 post-Civil War and turn-of-the-20th-century buildings, as well as the oldest two-thirds of Wood National Cemetery. The most historically significant and architecturally dominant building is the site's namesake, the Soldiers' Home (Building 2), or "Old Main."

The cemetery was established in 1871 as the Soldiers' Home Cemetery, on the grounds of the National Asylum for Disabled Soldiers, to inter the remains of soldiers who died while in the care of the Soldiers' hospital. The cemetery was renamed Wood Cemetery in 1937 in honor of General George Wood. It became a National Cemetery in 1973 and is the only National Cemetery in Wisconsin. Veterans of conflicts ranging from the war of 1812 to the Iraq war are buried in the cemetery.

Potential adverse effects to the Soldiers' Home Historic District and the Soldiers' Home NHL under the Double Deck alternative include the visual effects of constructing a 25- to 30-foot elevated structure to carry I-94 traffic, currently at-grade, between the north and south sides of the Soldiers' Home Historic District and the Soldiers' Home NHL, and the direct effects of converting non-transportation-related property within the Soldiers' Home Historic District and Soldiers' Home NHL into a transportation facility (reconstruction of Zablocki Drive) for the VA.

If the Double Deck alternative is identified as the preferred alternative in the Final EIS and selected for implementation in the Record of Decision,³ it would require further consultation with the consulting parties to identify specific measures to avoid and or minimize harm to the historic properties. Agreed upon measures would be stipulated in a Memorandum of Agreement and incorporated into the project implementation as commitments identified in the ROD. As part of the alternative development process, FHWA and WisDOT determined that project alternatives along I-94 from Hawley Road to Mitchell Boulevard would be constrained to the existing transportation right-of-way and that all graves would remain in place to avoid and minimize adverse effects to the Soldiers' Home Historic District and the Soldiers' Home NHL. Additional mitigation efforts could include the restoration of property previously functioning as a transportation facility into a more naturalized landscape, and provide openings in the elevated structure to allow for visual connections across I-94 between the north and south sides of the Soldiers' Home Historic District and Soldiers' Home NHL. Should the Double Deck alternative be selected, FHWA looks forward to additional consultation on

³ FHWA and WisDOT will identify a preferred alternative after the public hearing and comment period for the Draft EIS. The preferred alternative will be described in the Final EIS. FHWA officially selects an alternative to implement the proposed project as part of the Record of Decision.

ways to further avoid, minimize, and mitigate adverse effects to the Soldiers' Home Historic District and the Soldiers' Home NHL.

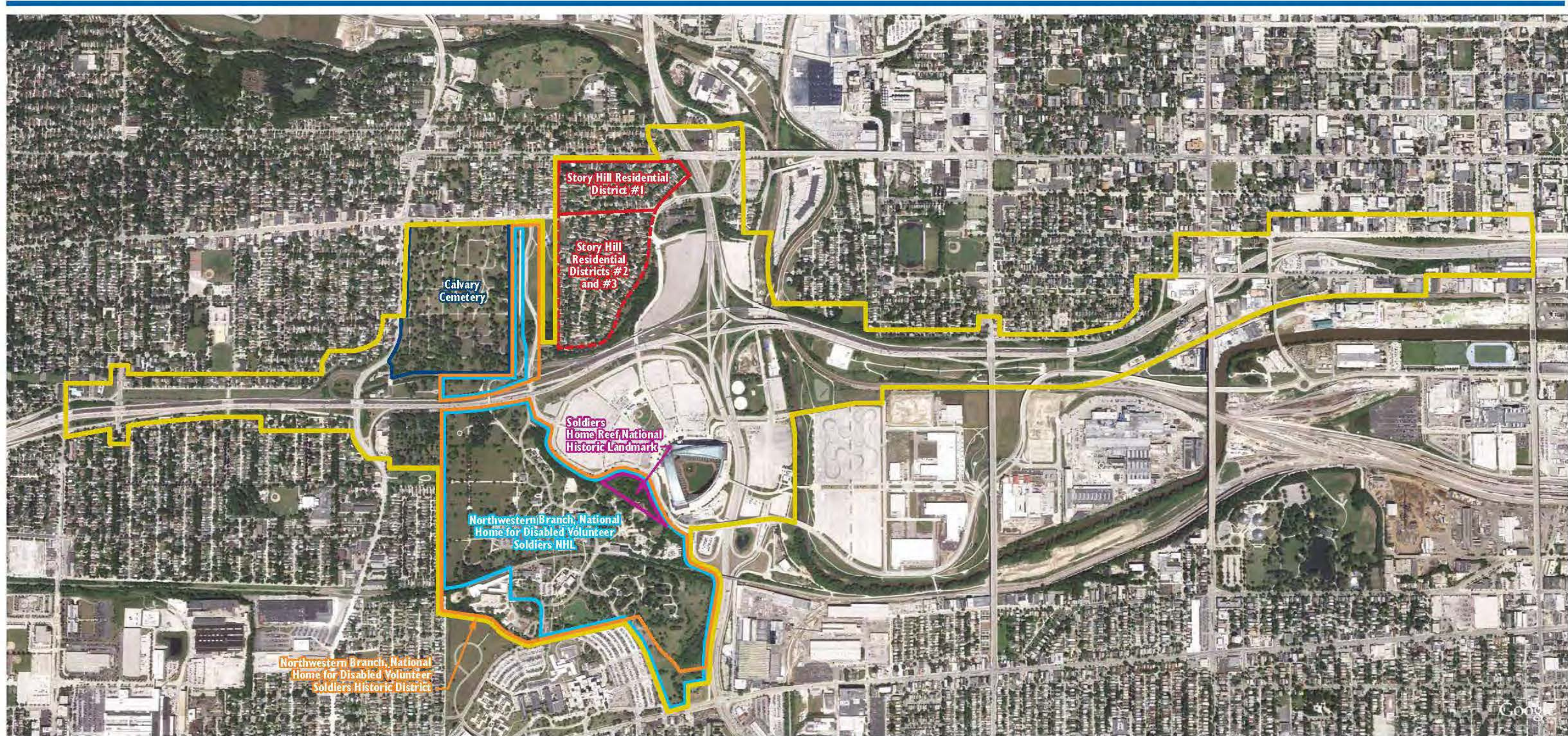
At the January 10, 2014 consultation meeting, the SHPO, NPS, ACHP, and other consulting parties generally agreed that the At-grade alternative could be designed to have no adverse effect to the Soldiers' Home Historic District and the Soldiers' Home NHL. FHWA has determined that the At-grade alternative, pending further engineering and design, would result in a conditional No Adverse Effect to the Soldiers' Home Historic District and the Soldiers' Home NHL. Should the At-grade alternative be selected, FHWA looks forward to continued consultation in the project design phase to ensure that an adverse effect is not created.

In summary, FHWA has determined that the Double Deck alternative would result in an Adverse Effect to the Soldiers' Home Historic District and the Soldiers' Home NHL. Direct adverse effects may be minimized by not acquiring property from the historic sites, not widening I-94 into the Soldiers' Home Historic District and the Soldiers' Home NHL, and not relocating graves. FHWA would continue consultation pursuant to 36 CFR 800.6 to look for opportunities to avoid, minimize, or mitigate adverse effects on the Northwestern Branch, National Home for Disabled Volunteer Soldiers National Historic Landmark and the Northwestern Branch, National Home for Disabled Volunteer Soldiers Historic District as well as on Calvary Cemetery and Story Hill Residential Districts #2 and #3. In addition, FHWA and WisDOT will gather the documentation for consultation materials (as described at 36 CFR 800.11(e)) used as part of the consultation process and prepare a report for consulting parties for further review and comment at a future consultation meeting.

FHWA looks forward to the consultation meeting October 16, 2014, and continued discussion on opportunities to minimize any impacts through avoidance, minimization, and mitigation. Please do not hesitate to contact me at bethaney.bacher-gresock@dot.gov or 608-662-2119 if I can be of additional assistance.

Enclosure

cc: Section 106 Consulting Parties



LEGEND

- Area of Potential Effect
- Northwestern Branch, National Home for Disabled Volunteer Soldiers National Historic Landmark
- Story Hill Residential District #1
- Story Hill Residential Districts #2 and 3
- Soldiers Home Reef National Historic Landmark
- Calvary Cemetery
- Northwestern Branch, National Home for Disabled Volunteer Soldiers Historic District



Historic Properties Located in the Area of Potential Effect (March 2014)

U.S. Department
of TransportationFederal Highway
Administration

Memorandum

Subject: **ACTION:** Addendum Assessment of
Adverse Effects Determination for the
I-94 East-West Corridor Project from
16th St to 70th St, Milwaukee, WI
(Project ID 1060-27-00)

Date: November 2, 2015

From: Bethaney Bacher-Gresock/FHWA
Major Projects Environmental Lead
Madison, WI 53717

In Reply Refer To:
HAD-WI

To: Jim Draeger/Wisconsin SHPO
Reid Nelson/ACHP
Cameron Sholly/NPS
Section 106 Consulting Parties

The Federal Highway Administration (FHWA) – Wisconsin Division Office, in cooperation with Wisconsin Department of Transportation (WisDOT), has developed an environmental impact statement (EIS) for the I-94 East-West Corridor project from 16th Street to 70th Street in Milwaukee, Wisconsin. The purpose of the project is to maintain I-94 as a key link in the local, state, and national transportation network; to address obsolete design of I-94 to improve safety and decrease crashes; to replace deteriorated pavement; and to accommodate existing and future traffic volumes at an acceptable level of service.

This addendum to the September 24, 2014 *Revised FHWA Assessment of Adverse Effects for the I-94 East-West Corridor Project* memorandum provides FHWA's effect determinations for off-interstate improvements not evaluated in the Draft EIS, pursuant to 36 CFR 800.5. This document also serves to inform consulting parties that FHWA intends to make Section 4(f) *de minimis* impact determinations pursuant to 23 CFR 774.5(b)(1) for the Northwestern Branch, National Home for Disabled Volunteer Soldiers National Historic Landmark and related National Register Historic District.

As part of the preferred alternative in the west segment, WisDOT would construct some off-interstate improvements to mitigate the traffic impacts of partially closing the Hawley Road interchange. These improvements include extending Washington Street to make it easier for drivers in the Hawley Road corridor to access the 68th Street/70th Street interchange. The improvements at Washington Street would not affect any identified historic properties.

In addition to the Washington Street connection, three local roadway intersections have been identified for upgrades to improve local road operations under the partial closure of

the Hawley Road interchange. Each of the intersections would see a modest increase in traffic volumes as a result of the access change at Hawley Road. The local road intersections are:

- 70th Street/Greenfield Avenue
- National Avenue/Greenfield Avenue
- Miller Park Way/National Avenue

The following off-interstate improvement areas include historic properties:

- National Avenue/Greenfield Avenue
 - Paradise Theater
- Miller Park Way/National Avenue
 - Northwestern Branch, National Home for Disabled Volunteer Soldiers National Historic Landmark

FHWA, in consultation with the State Historic Preservation Office (SHPO), Advisory Council on Historic Preservation (ACHP) and other consulting parties, identified individual Areas of Potential Effect (APEs) for the identified off-interstate improvements associated with the I-94 East-West Corridor project (Attachment 1).

As part of the Section 106 consultation process, FHWA invited consulting parties to share their views on the potential effects the off-interstate improvements may have on the historic properties located within the APEs, pursuant to 36 CFR 800.4(d)(2) and 36 CFR 800.5. According to 36 CFR 800.5(a)(1), “an adverse effect is found when the undertaking may alter, directly or indirectly, any of the characteristics that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association”.

FHWA, in consultation with the SHPO, ACHP, National Park Service (NPS) as it pertains to NHLs, the Veterans Administration (VA), and other consulting parties, has applied the criteria of adverse effect, considered the views of consulting parties, and determined that the off-interstate improvements would have No Adverse Effect on the identified historic properties within the APEs:

- Northwestern Branch, National Home for Disabled Volunteer Soldiers National Historic Landmark
- Paradise Theater

The project would not acquire, alter, or change the characteristics that qualify the properties for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association.

Northwestern Branch, National Home for Disabled Volunteer Soldiers National Historic Landmark

The Northwestern Branch, National Home for Disabled Volunteer Soldiers National Historic Landmark (Soldiers’ Home NHL) and the Soldiers’ Home National Register Historic District are essentially the same historic property with some slight differences between the historical boundaries. However, those differences are in the southern portion of the property and the Soldiers’ Home National Register Historic District would not be

impacted by the off-interstate improvements. This memo discusses only the Soldiers' Home NHL.

The National Asylum for Disabled Soldiers, as it was originally named, was established in 1865. Milwaukee's Soldiers' Home campus is the only one of the three original Soldiers' Home sites nationwide to have its majestic Soldiers' Home intact, and it is also the only one with the majority of its surrounding recuperative village remaining. The Soldiers' Home NHL houses 25 post-Civil War and turn-of-the-20th century buildings, as well as the oldest two-thirds of Wood National Cemetery.

The cemetery was established in 1871 as the Soldiers' Home Cemetery, on the grounds of the National Asylum for Disabled Soldiers, to inter the remains of soldiers who died while in the care of the Soldiers' hospital. The cemetery was renamed Wood Cemetery in 1937 in honor of General George Wood. It became a National Cemetery in 1973 and is the only National Cemetery in Wisconsin. Veterans of conflicts ranging from the war of 1812 to the Iraq war are buried in the cemetery.

The improvements at the Miller Park Way/National Avenue intersection include changes to National Avenue at General Mitchell Boulevard, an entrance to the VA Campus and specifically the VA Medical Center (Attachment 2). The improvements to National Avenue at General Mitchell Boulevard include extending the westbound through-lane an additional 500 feet and constructing a westbound dedicated right-turn lane onto General Mitchell Boulevard. This dedicated right-turn lane would require the acquisition of 0.20 acre of land from the Soldiers' Home NHL on its southern boundary. None of the identified heritage trees (in the Historic American Landscape Survey) would be directly impacted; the land to be acquired is an open, grassy area. The area north of National Avenue between General Mitchell Boulevard and Miller Park Way is an area of grass, trees, and a newly constructed parking lot and is part of the Soldiers' Home NHL, except for the extreme southeast corner. The area on the west side of General Mitchell Boulevard is an open parking lot that serves the VA Medical Center; this area is not within the Soldiers' Home NHL boundary. Additionally, there is a new surface parking lot on the east side of General Mitchell Boulevard with a slight overlap with the NHL.

During consultation, some parties expressed concern about the new construction causing visual impacts to the NHL, particularly to the landscape features and setting, as well as impacts to the heritage trees. FHWA will continue to consult with the City of West Milwaukee and consulting parties to identify a design option that least protrudes into the Soldiers' Home NHL. FHWA will also avoid the removal of the existing trees in the area of the improvements; specifically the tree identified as a heritage tree, which is a roughly 35-year-old Norway Maple. The Programmatic Agreement for the I-94 East-West Corridor project, which is in draft form and will be executed prior to finalization of the Record of Decision, will include stipulations regarding the design of this intersection and the impacts on the NHL and its trees.

The loss of 0.20 acre as part of the improvements would not be a significant impact to the NHL. This area is the far southern boundary of the NHL and the 0.20 acre will not be visible from Wood National Cemetery, nor from the buildings and structures that make up the Soldiers' Home NHL complex. Traffic at the intersection of General Mitchell Boulevard and National Avenue will not increase due to the added turn lane. The NHL will retain its integrity of location, design, setting, materials, workmanship, feeling, and association.

FHWA, in consultation with SHPO, ACHP, and consulting parties, has determined that there would be No Adverse Effect from the Preferred Alternative, including the off-interstate improvements on the Soldiers' Home NHL under 36 CFR 800.5. Pursuant to 23 CFR 774.5(b)(1), FHWA intends to make a Section 4(f) *de minimis* impact determination for the Soldiers' Home NHL based on the written concurrence of SHPO, ACHP, and NPS in this No Adverse Effect finding.

Northwestern Branch, National Home for Disabled Volunteer Soldiers National Register Historic District

While the Northwestern Branch, National Home for Disabled Volunteer Soldiers National Register Historic District (Soldiers' Home National Register Historic District) will not be impacted by the off-interstate improvements, it will be impacted by other elements of the project, as identified in the Final EIS. The No Adverse Effect determination from September 24, 2014 has not changed. Pursuant to 23 CFR 774.5(b)(1), FHWA intends to make a Section 4(f) *de minimis* impact determination for the Soldiers' Home National Register Historic District based on the written concurrence of SHPO and ACHP in this No Adverse Effect finding.

Paradise Theater

The former Paradise Theater, (now the Epikos Church) was designed and built by Urban F. Peacock in 1929 in the 20th Century Revival style. It sits on a triangular lot formed by Greenfield and National Avenues in the city of West Allis, Milwaukee County. The structure exhibits classical, Art Deco, and French Renaissance stylistic elements. The opulent auditorium and lobby are largely intact, including ceramic tile floors, decorative plaster moldings with fruit and flower motifs, and the original grand staircase. The Paradise Theater is a local example of a building type that was once commonly found in downtown and neighborhood areas of many communities in the United States. It is eligible for the National Register under Criterion C for its architectural elements and as an example of a 1920s theater that exhibits a good degree of interior and exterior integrity. The SHPO concurred with the National Register eligibility determination on September 26, 2015.

The Paradise Theater is located on a triangular lot formed by Greenfield and National Avenues at the intersection with 62nd Street. Improvements at this intersection will not require any property acquisition (Attachment 3). Improvements to Greenfield Avenue will include changes to the signal timing, restriping to create a dedicated left-turn lane, and a combined through and right-turn lane in each direction, and the elimination of 70 feet of parking on the westbound lane. Improvements to National Avenue also include signal timing, restriping to create a dedicated right-turn lane, and the elimination of 100 feet of parking on the southbound lane. These improvements intend to decrease the current backup for the left turn onto 62nd Street.

The changes to the traffic patterns on Greenfield and National Avenues would have minimal noise impacts on the Paradise Theater, compared to existing conditions. The traffic volume changes would not be such that it would measurably increase the noise level at this location. The theater is eligible for listing on the National Register because it is a very good example of a 1920s theater that exhibits a high degree of exterior and interior integrity. The improvements to the intersection will not alter the appearance of the theater and will not impact the ability to utilize the building, which is now a church.

The building will retain its integrity of location, design, setting, materials, workmanship, feeling, and association.

FHWA, in consultation with SHPO, ACHP, and consulting parties has determined that there would be No Adverse Effect from the off-interstate improvements on Paradise Theater, under 36 CFR 800.5.


Conclusion

These effect determinations for the off-interstate improvements do not change the overall determination of No Adverse Effect on historic properties from the I-94 East-West Corridor project under Section 106 of the National Historic Preservation Act.

Pursuant to 23 CFR 774.5(b)(1), FHWA requires written concurrence in this No Adverse Effect finding from the SHPO, ACHP, and NPS (as it pertains to the Soldiers' Home NHL) prior to making a Section 4(f) *de minimis* impact determination for the Soldiers' Home NHL and the Soldiers' Home National Register Historic District. If you have no additional questions or comments, please sign below indicating concurrence on the determination of effects for the off-interstate improvements and the overall I-94 project.

Please do not hesitate to contact me at bethaney.bacher-gresock@dot.gov or 608-662-2119 if I can be of additional assistance.

CONCUR: No Adverse Effect on the Soldiers' Home NHL, Soldiers' Home National Register Historic District, and Paradise Theater



Jim Draeger, Wisconsin State Historic Preservation Officer

1/25/16
Date

Reid Nelson, Advisory Council on Historic Preservation

Date

Dr. Michele Curran, National Park Service

Date

- Attachment 1: Historic Properties Located in the Area of Potential Effect
- Attachment 2: Miller Park Way/National Avenue Intersection Improvement Impact to Soldiers' Home NHL
- Attachment 3: Off-Interstate Improvements for Preferred Alternative – Greenfield Avenue and National Avenue Intersection
- Attachment 4: Revised FHWA Assessment of Adverse Effects for the I-94 East-West Corridor Project

The building will retain its integrity of location, design, setting, materials, workmanship, feeling, and association.

FHWA, in consultation with SHPO, ACHP, and consulting parties has determined that there would be No Adverse Effect from the off-interstate improvements on Paradise Theater, under 36 CFR 800.5.

Conclusion

These effect determinations for the off-interstate improvements do not change the overall determination of No Adverse Effect on historic properties from the I-94 East-West Corridor project under Section 106 of the National Historic Preservation Act.

Pursuant to 23 CFR 774.5(b)(1), FHWA requires written concurrence in this No Adverse Effect finding from the SHPO, ACHP, and NPS (as it pertains to the Soldiers' Home NHL) prior to making a Section 4(f) *de minimis* impact determination for the Soldiers' Home NHL and the Soldiers' Home National Register Historic District. If you have no additional questions or comments, please sign below indicating concurrence on the determination of effects for the off-interstate improvements and the overall I-94 project.

Please do not hesitate to contact me at bethaney.bacher-gresock@dot.gov or 608-662-2119 if I can be of additional assistance.

CONCUR: No Adverse Effect on the Soldiers' Home NHL, Soldiers' Home National Register Historic District, and Paradise Theater

Jim Draeger, Wisconsin State Historic Preservation Officer

Date

for Charlene Ann Carlson

Reid Nelson, Advisory Council on Historic Preservation

11/19/13

Date

Dr. Michele Curran, National Park Service

Date

- Attachment 1: Historic Properties Located in the Area of Potential Effect
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The building will retain its integrity of location, design, setting, materials, workmanship, feeling, and association.

FHWA, in consultation with SHPO, ACHP, and consulting parties has determined that there would be No Adverse Effect from the off-interstate improvements on Paradise Theater, under 36 CFR 800.5.

Conclusion

These effect determinations for the off-interstate improvements do not change the overall determination of No Adverse Effect on historic properties from the I-94 East-West Corridor project under Section 106 of the National Historic Preservation Act.

Pursuant to 23 CFR 774.5(b)(1), FHWA requires written concurrence in this No Adverse Effect finding from the SHPO, ACHP, and NPS (as it pertains to the Soldiers' Home NHL) prior to making a Section 4(f) *de minimis* impact determination for the Soldiers' Home NHL and the Soldiers' Home National Register Historic District. If you have no additional questions or comments, please sign below indicating concurrence on the determination of effects for the off-interstate improvements and the overall I-94 project.

Please do not hesitate to contact me at bethaney.bacher-gresock@dot.gov or 608-662-2119 if I can be of additional assistance.

CONCUR: No Adverse Effect on the Soldiers' Home NHL, Soldiers' Home National Register Historic District, and Paradise Theater

Jim Draeger, Wisconsin State Historic Preservation Officer

Date

Reid Nelson, Advisory Council on Historic Preservation

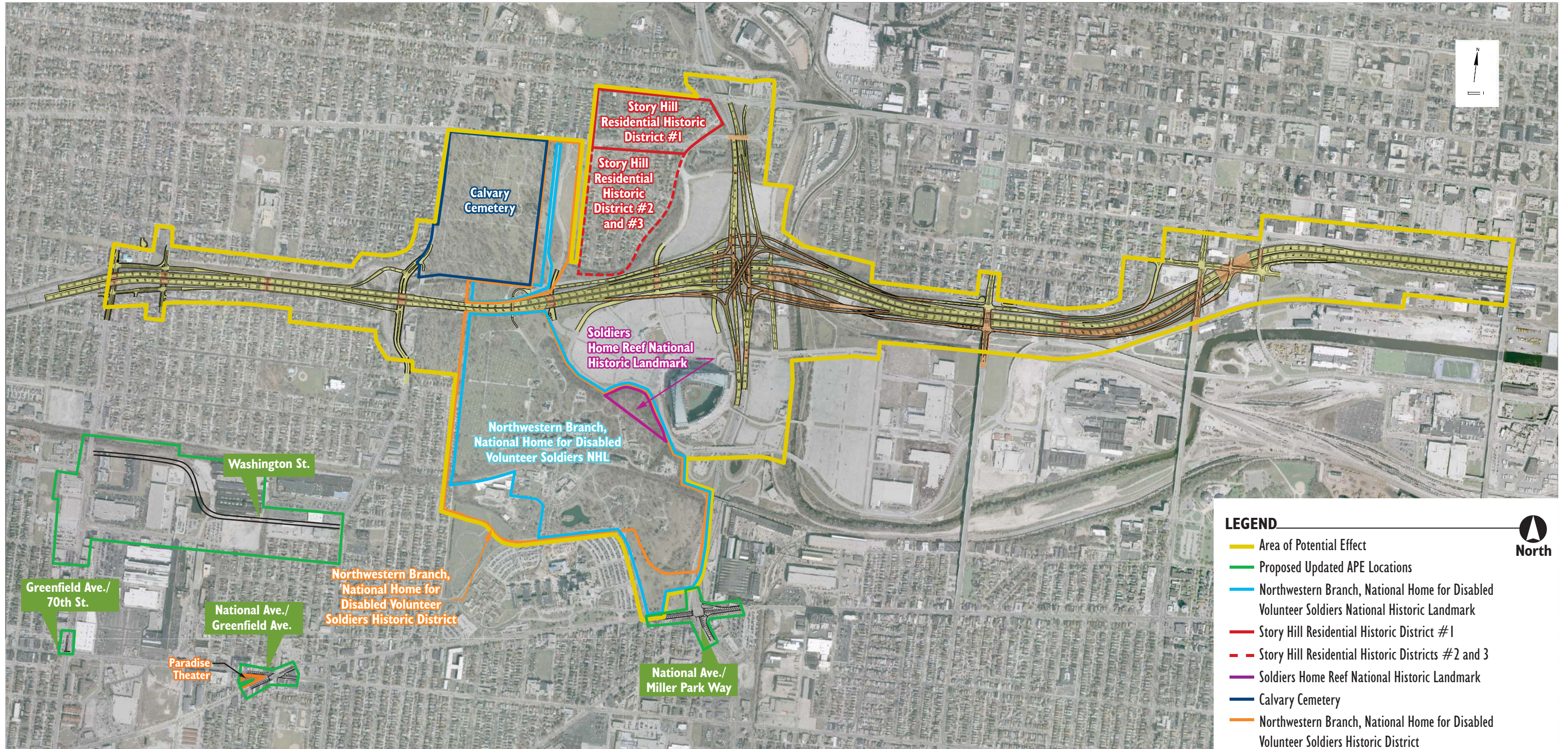
Date



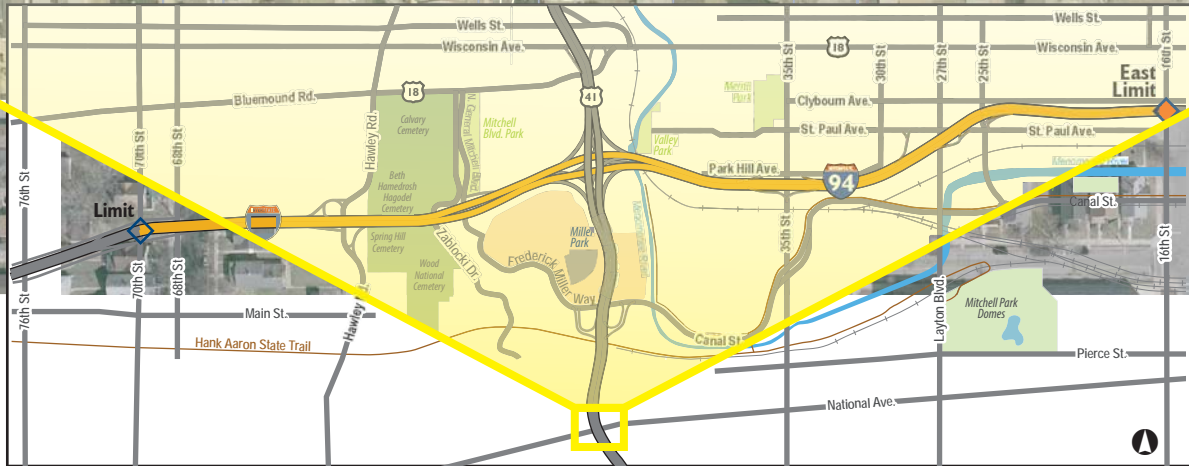
Cameron Sholly, National Park Service Midwest Region

11/23/15
Date

- Attachment 1: Historic Properties Located in the Area of Potential Effect
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- Attachment 4: Revised FHWA Assessment of Adverse Effects for the I-94 East-West Corridor Project



Preferred Alternative



TRO3151044MKE Project Location Map_v1



U.S. Department of Transportation
**Federal Highway
Administration**

Attachment 2 Miller Park Way/National Avenue Intersection Improvement Impact to Soldiers' Home NHL



Attachment 3

Off-Interstate Improvements for Preferred Alternative – Greenfield Avenue and National Avenue Intersection

BY ELECTRONIC MAIL



U.S. Department
of Transportation
Federal Highway
Administration

Memorandum

Subject: INFORMATION: Revised FHWA
Assessment of Adverse Effects for the I-
94 East – West Corridor Project from
16th St to 70th St, Milwaukee, WI (Project
ID 1060-27-00)

Date: September 24, 2014

From: Bethaney Bacher-Gresock
Major Projects Environmental Manager
Madison, WI

In Reply Refer To:
HDA-WI

To: Dobra Payant
Deputy Project Manager, SE Region
Waukesha, WI

The Federal Highway Administration–Wisconsin Division Office (FHWA), in cooperation with Wisconsin Department of Transportation (WisDOT), is developing an environmental impact statement (EIS) for a proposed project on I-94 from 16th Street to 70th Street in Milwaukee, Wisconsin. This memorandum provides FHWA's effect determinations pursuant to 36 CFR 800.5. FHWA submitted the first draft of this memorandum to the consulting parties for review and comment in April 2014. This revised memorandum reflects the comments received on the first draft as well as subsequent consultation meetings.

FHWA, in consultation with the State Historic Preservation Office (SHPO) and other consulting parties, identified the project's Area of Potential Effect (APE) and the following historic properties within it.¹

- Calvary Cemetery
- Northwestern Branch, National Home for Disabled Volunteer Soldiers Historic District (Soldiers' Home Historic District)
- Northwestern Branch, National Home for Disabled Volunteer Soldiers National Historic Landmark (Soldiers' Home NHL)
- Soldiers' Home Reef National Historic Landmark
- Story Hill Residential District #1
- Story Hill Residential Districts #2 and #3

¹ FHWA Memorandum: *Historic Properties On or Eligible for the National Register within the APE for the I-94 East-West Corridor from 16th St to 70th St* (October 8, 2013, APE map revised March 2014 to clarify historic boundaries for the Northwestern Branch, National Home for Disabled Volunteer Soldiers National Historic Landmark, and the National Register listed Historic District). APE map revised March 2014 is attached. Brief summaries describing the characteristics and significance of the historic properties were provided as part of the October 15, 2013 consultation meeting.

The purpose of the proposed project is to maintain I-94 as a key link in the local, state, and national transportation network; to address obsolete roadway design to improve safety (including replacing left-hand entrances and exits and providing proper weaving distances between exit and entrance ramps); to replace deteriorated pavement and infrastructure (bridges); and to improve capacity by accommodating current and future traffic volumes at an acceptable level of service.

Through the alternatives screening process, the following project alternatives, located within the APE, were retained for detailed study for the I-94 East-West Corridor West Segment (70th Street to Stadium Interchange):

- At-grade alternative: Add a fourth lane in each direction, split-diamond interchange at 68th/70th Streets with either no Hawley Road interchange or a half interchange at Hawley Road (entrance/exit ramps to and from the west), and narrow lanes and shoulders through the cemetery area.
- Double Deck alternative: Add a fourth lane in each direction, split diamond interchange at 68th/70th Streets, full Hawley Road interchange, and a double deck (all up or partially down) through the cemetery area.

These alternatives, along with the No-Build alternative, are evaluated in detail in the I- 94 East-West Corridor Draft EIS.

As part of the Section 106 consultation process, FHWA invited consulting parties to share their views² on the potential effects the proposed I-94 project may have on the historic properties located in the APE pursuant to 36 CFR 800.4(d)(2) and 36 CFR 800.5. According to 36 CFR 800.5(a)(1), “an adverse effect is found when the undertaking may alter, directly or indirectly, *any of the characteristics that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association*” (emphasis added).

FHWA, in consultation with the SHPO, Advisory Council on Historic Preservation (ACHP), National Park Service (NPS) as it pertains to NHLs, the Department of Veterans Affairs (VA), and other consulting parties, has applied the criteria of adverse effect, considered the views of consulting parties identified in *I-94 East-West Corridor Study Potential Effects on Historic Resources* (February 26, 2014), and determined that the proposed project, regardless of the alternative selected, would have No Adverse Effect on the following properties:

- Soldiers’ Home Reef National Historic Landmark
- Story Hill Residential District #1

The project would not acquire, alter, or change the characteristics that qualify the properties for inclusion in the National Register in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association.

The proposed project would have No Adverse Effect on the Soldiers’ Home Reef National Historic Landmark which was listed on the National Register and designated as a landmark in 1993. The historical significance of the 400-million-year-old Silurian Period fossil reef derives from its discovery in the 1830s by Wisconsin’s first scientist, Increase A. Lapham, and by James Hall who recognized and described it in 1861 as an ancient fossil reef. The reef was one of the first described reefs in North America and the world. Thomas Chamberlin used the reef and others in formulating his paleoecological and sedimentological model of reef development. The proposed project would not

² Consulting party views were recorded in the *I-94 East-West Corridor Study Potential Effects on Historic Resources* memo dated February 13, 2014 and in the Section 106 Consultation meeting minutes from July 15, 2013, to February 13, 2014.

acquire property or otherwise alter or change the character or setting of the historic reef in a manner that diminishes its historic integrity.

The proposed project would have No Adverse Effect on the National Register eligible Story Hill Residential District #1. The historic significance of the district is derived from its period Craftsman and Colonial Revival style homes distinguished by their stucco cladding. The Story Hill neighborhood was developed when Albert & Alice Story registered a plat in 1911. The period of significance spans 1909–1936. The proposed project would not have direct impacts on Story Hill Residential District #1 or otherwise alter or change the character or setting of district in a manner that diminishes its historic integrity.

FHWA, in consultation with the SHPO, ACHP, NPS, the VA, and other consulting parties, has applied the criteria of adverse effect, considered the views of consulting parties and determined that the At-grade alternative would have No Adverse Effect and the Double Deck alternative would have a potential Adverse Effect on the following properties:

- Calvary Cemetery
- Story Hill Residential Districts #2 and #3

The historical significance of Calvary Cemetery is derived from its function as the final resting place of a number of influential individuals who made outstanding contributions to the history of Milwaukee and for embodying the “high style” qualities of Late Victorian and Classical Revival architecture. The period of significance is from 1857 to about 1922.

The At-grade alternative would not require acquisition of any Calvary Cemetery property. The noise levels would remain roughly the same as existing conditions. The roadway under this alternative would be slightly elevated (up to 3-5 feet) compared to the existing interstate, but the viewshed from the cemetery would have only minor modifications. The At-grade alternative would not alter or change the character of the property in a manner that diminishes the historic integrity of the property’s location, design, setting, materials, workmanship, feeling, or association. The At-grade alternative would have No Adverse Effect on Calvary Cemetery.

The Double Deck alternative could have an Adverse Effect on the National Register-eligible Calvary Cemetery. There would be no direct impacts to the property from the project, and no cemetery property would be acquired. However, there could be indirect impacts to the cemetery from the visual impacts of an elevated interstate. The integrity of location, design, materials, and association would not be altered or diminished by the project. The location of the cemetery would remain intact; the design and materials of the landscape and the architecture would be retained; and the cemetery would continue to be associated with the influential Milwaukee individuals. However, the visual impacts could diminish the integrity of setting and feeling. The viewshed of Calvary Cemetery includes the interstate, but under the Double Deck alternative, the view from the cemetery would be altered and obstructed by the new elevated roadway, which would be 25 to 30 feet taller than the existing roadway.

In summary, the At-grade alternative would have No Adverse Effect on Calvary Cemetery. The Double Deck alternative would have a potential Adverse Effect on Calvary Cemetery due to the visual impacts that could diminish the integrity of setting and feeling of the property.

The period of significance for the National Register-eligible Story Hill Residential Districts #2 and #3 spans from 1924–1963, with much of the construction occurring in the 1920s. The historic significance of the district is derived from its Period Revival styles, which are well represented in the form of Period Colonial Revival, Tudor Revival, and Mediterranean Revival styles and features examples of several well-regarded Milwaukee architects and builders, including Hugo C. Haeuser, Roy J. Jacobs, and the firm of George Schley & Sons. Of the 153 properties within the district, only three are considered noncontributing. Some of the contributing properties on the southeastern side of the

Story Hill Residential Districts #2 and #3 currently have views of the existing, highly urban I-94 corridor, the Stadium Interchange with elevated ramps, and the associated transportation infrastructure. Residents of the district have noise concerns because of the freeway and nearby Miller Park, home of the Milwaukee Brewers. These properties have coexisted with the I-94 corridor for more than 50 years, since the freeway opened in 1963.

As part of the alternative development process, FHWA and WisDOT are carrying forward alternatives within the view from Story Hill Residential Districts #2 and #3 that hold the northern freeway right-of-way line at its existing location, maintain I-94 westbound travel lanes and shoulder in their existing location, maintain the vegetative screening near Story Parkway, and move all proposed freeway improvements farther away. (The proposed Stadium Interchange flyover ramp would be roughly 1,300 feet away from the district.)

The At-grade alternative would not require acquisition of any property in Story Hill Residential Districts #2 and #3. Under the At-grade alternative, the freeway would be about the same elevation it is today adjacent to the historic district. Existing views towards I-94 and beyond would essentially remain the same. Noise levels from the At-grade alternative, if selected, are expected to result in a 1-2 decibel increase within the district, according to the noise analysis conducted as part of the EIS. Although an increase of less than 3 decibels is generally imperceptible to the human ear, the existing noise levels in the district are high enough that a noise wall is reasonable and feasible at that location under WisDOT policy. FHWA has determined that the increase in noise levels within the historic district would not be an adverse effect under Section 106. If a noise wall were installed to mitigate current or future noise levels, the wall itself may constitute an adverse effect on the district because of visual obstruction of the viewshed from the historic district properties.

The At-grade alternative would not alter or change the character of the property in a manner that diminishes the historic integrity of the property's location, design, setting, materials, workmanship, feeling, or association. The At-grade alternative would have No Adverse Effect on Story Hill Residential Districts #2 and #3.

Noise levels from the Double Deck alternative, if selected, are expected to result in a 0 to 6 decibel increase within the district, according to the noise analysis conducted as part of the EIS. As previously noted, the existing noise levels in the district are high enough that a noise wall is reasonable and feasible at that location under WisDOT policy. FHWA has determined that the increase in noise levels within the historic district would not be an adverse effect under Section 106. If a noise wall were installed to mitigate current or future noise levels, the wall itself may constitute an adverse effect on the district because of visual obstruction of the viewshed from the historic district properties.

The Double Deck alternative would not require acquisition of any property in Story Hill Residential Districts #2 and #3. The Double Deck alternative would raise the freeway 14-feet (Partially Down option) to 20-feet (All Up option) at the west end of the district. Under the At-grade and the Double Deck alternatives an eastbound exit ramp from I-94 to US 41/Miller Park Way at the Stadium Interchange would add additional roadway infrastructure that would be roughly 30 feet higher than the existing interchange. This ramp would be roughly 1,300 feet from the district boundary. Under the Double Deck alternative, the new exit ramp and the elevated double deck structures through the cemetery area would be visible from parts of the historic district. The visual impacts of the Double Deck alternative (All Up or Partially Down options) to the district could diminish the integrity of setting and feeling of the historic property. There would be no direct impacts to the district, so it would retain integrity of design, materials, workmanship, and association.

In conclusion, the Double Deck alternative would have a potential Adverse Effect to Story Hill Residential Districts #2 and #3. The visual changes to the district could alter or change the setting and feeling of the district in a manner that could diminish its historic integrity. The At-grade alternative would have No Adverse Effect on the Story Hill Residential Districts #2 and #3.

FHWA, in consultation with the SHPO, ACHP, NPS, the VA, and other consulting parties, has applied the criteria of adverse effect, considered the views of consulting parties identified in the February 13, 2014 *I-94 East-West Corridor Study Potential Effects on Historic Resources* document, and determined that the At-grade alternative could be designed to have to have a No Adverse Effect and the Double Deck alternative would have an Adverse Effect on the following properties:

- Northwestern Branch, National Home for Disabled Volunteer Soldiers Historic District
- Northwestern Branch, National Home for Disabled Volunteer Soldiers National Historic Landmark

The Soldiers' Home NHL and Soldiers' Home Historic District are essentially the same historic property with some slight differences between the historical boundaries and periods of historic significance. The attached exhibit shows the boundaries of the NHL and Historic District. The period of significance for the Soldiers' Home NHL is 1866-1930 and 1867-1955 for the Soldiers' Home Historic District. The National Asylum for Disabled Soldiers, as it was originally named, was established in 1865. The Milwaukee Soldiers' Home campus is the only one of the three original Soldiers' Home sites to have its majestic Soldiers' Home intact, and it is also the only one with the majority of its surrounding recuperative village remaining. The Soldiers' Home NHL houses 25 post-Civil War and turn-of-the-20th-century buildings, as well as the oldest two-thirds of Wood National Cemetery. The most historically significant and architecturally dominant building is the site's namesake, the Soldiers' Home (Building 2), or "Old Main."

The cemetery was established in 1871 as the Soldiers' Home Cemetery, on the grounds of the National Asylum for Disabled Soldiers, to inter the remains of soldiers who died while in the care of the Soldiers' hospital. The cemetery was renamed Wood Cemetery in 1937 in honor of General George Wood. It became a National Cemetery in 1973 and is the only National Cemetery in Wisconsin. Veterans of conflicts ranging from the war of 1812 to the Iraq war are buried in the cemetery.

Potential adverse effects to the Soldiers' Home Historic District and the Soldiers' Home NHL under the Double Deck alternative include the visual effects of constructing a 25- to 30-foot elevated structure to carry I-94 traffic, currently at-grade, between the north and south sides of the Soldiers' Home Historic District and the Soldiers' Home NHL, and the direct effects of converting non-transportation-related property within the Soldiers' Home Historic District and Soldiers' Home NHL into a transportation facility (reconstruction of Zablocki Drive) for the VA.

If the Double Deck alternative is identified as the preferred alternative in the Final EIS and selected for implementation in the Record of Decision,³ it would require further consultation with the consulting parties to identify specific measures to avoid and or minimize harm to the historic properties. Agreed upon measures would be stipulated in a Memorandum of Agreement and incorporated into the project implementation as commitments identified in the ROD. As part of the alternative development process, FHWA and WisDOT determined that project alternatives along I-94 from Hawley Road to Mitchell Boulevard would be constrained to the existing transportation right-of-way and that all graves would remain in place to avoid and minimize adverse effects to the Soldiers' Home Historic District and the Soldiers' Home NHL. Additional mitigation efforts could include the restoration of property previously functioning as a transportation facility into a more naturalized landscape, and provide openings in the elevated structure to allow for visual connections across I-94 between the north and south sides of the Soldiers' Home Historic District and Soldiers' Home NHL. Should the Double Deck alternative be selected, FHWA looks forward to additional consultation on

³ FHWA and WisDOT will identify a preferred alternative after the public hearing and comment period for the Draft EIS. The preferred alternative will be described in the Final EIS. FHWA officially selects an alternative to implement the proposed project as part of the Record of Decision.

ways to further avoid, minimize, and mitigate adverse effects to the Soldiers' Home Historic District and the Soldiers' Home NHL.

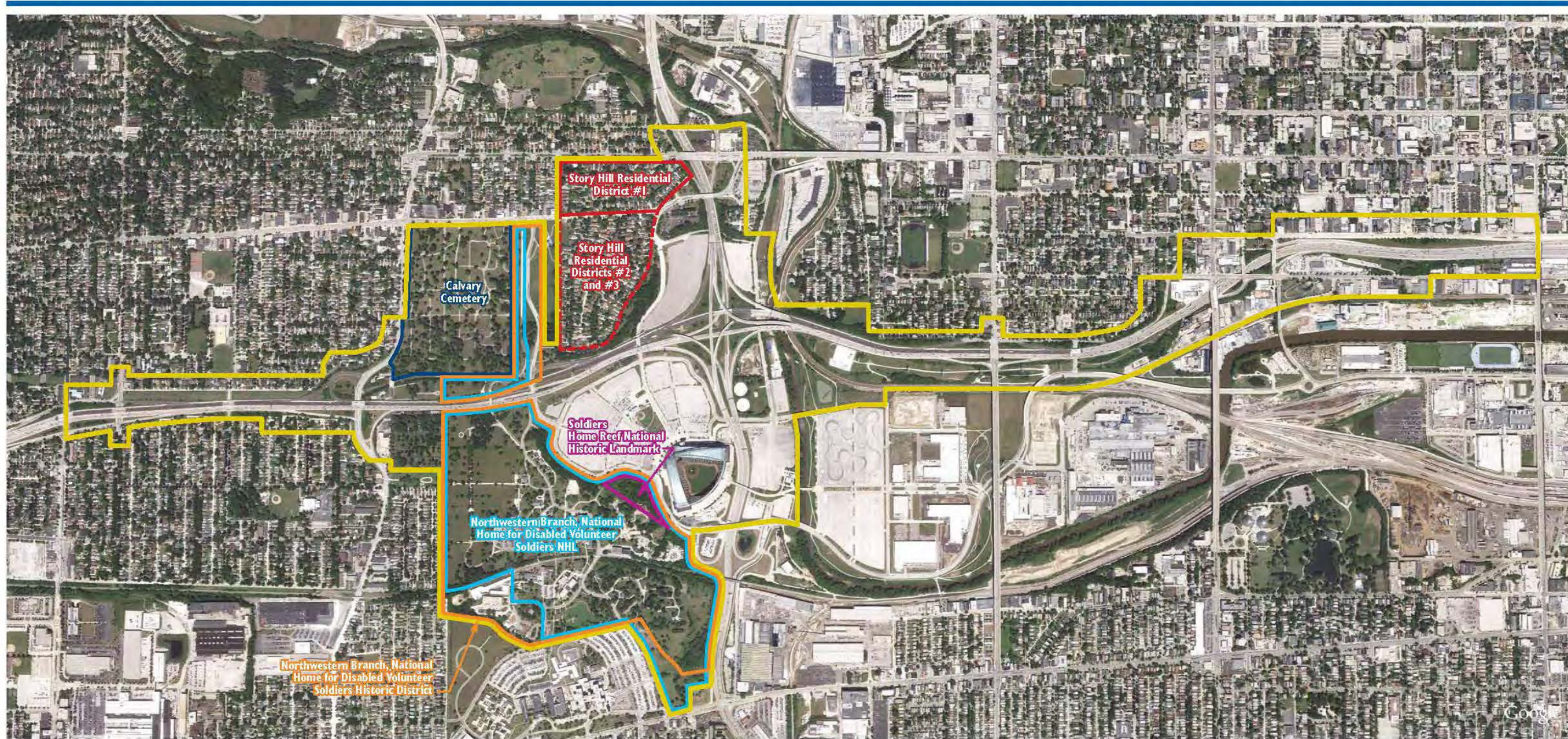
At the January 10, 2014 consultation meeting, the SHPO, NPS, ACHP, and other consulting parties generally agreed that the At-grade alternative could be designed to have no adverse effect to the Soldiers' Home Historic District and the Soldiers' Home NHL. FHWA has determined that the At-grade alternative, pending further engineering and design, would result in a conditional No Adverse Effect to the Soldiers' Home Historic District and the Soldiers' Home NHL. Should the At-grade alternative be selected, FHWA looks forward to continued consultation in the project design phase to ensure that an adverse effect is not created.

In summary, FHWA has determined that the Double Deck alternative would result in an Adverse Effect to the Soldiers' Home Historic District and the Soldiers' Home NHL. Direct adverse effects may be minimized by not acquiring property from the historic sites, not widening I-94 into the Soldiers' Home Historic District and the Soldiers' Home NHL, and not relocating graves. FHWA would continue consultation pursuant to 36 CFR 800.6 to look for opportunities to avoid, minimize, or mitigate adverse effects on the Northwestern Branch, National Home for Disabled Volunteer Soldiers National Historic Landmark and the Northwestern Branch, National Home for Disabled Volunteer Soldiers Historic District as well as on Calvary Cemetery and Story Hill Residential Districts #2 and #3. In addition, FHWA and WisDOT will gather the documentation for consultation materials (as described at 36 CFR 800.11(e)) used as part of the consultation process and prepare a report for consulting parties for further review and comment at a future consultation meeting.

FHWA looks forward to the consultation meeting October 16, 2014, and continued discussion on opportunities to minimize any impacts through avoidance, minimization, and mitigation. Please do not hesitate to contact me at bethaney.bacher-gresock@dot.gov or 608-662-2119 if I can be of additional assistance.

Enclosure

cc: Section 106 Consulting Parties



LEGEND

- Area of Potential Effect
- Northwestern Branch, National Home for Disabled Volunteer Soldiers National Historic Landmark
- Story Hill Residential District #1
- - Story Hill Residential Districts #2 and 3
- Soldiers Home Reef National Historic Landmark
- Calvary Cemetery
- Northwestern Branch, National Home for Disabled Volunteer Soldiers Historic District



Historic Properties Located in the Area of Potential Effect (March 2014)

PROGRAMMATIC AGREEMENT
AMONG
FEDERAL HIGHWAY ADMINISTRATION,
WISCONSIN STATE HISTORIC PRESERVATION OFFICER,
AND
ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING
WISCONSIN DEPARTMENT OF TRANSPORTATION PROJECT ID #1060-27-00
WHS #13-0065

I-94 EAST-WEST CORRIDOR STUDY
(70th Street to 16th Street)
CITY OF MILWAUKEE
MILWAUKEE COUNTY

WHEREAS, the Federal Highway Administration (FHWA) proposes to improve the Interstate 94 (I-94) East-West Corridor, Milwaukee, Wisconsin, described as the Preferred Alternative in the *Environmental Impact Statement Interstate 94 East-West Corridor*; and

WHEREAS, FHWA proposes to make improvements to I-94 to 3.5 miles of I-94 in Milwaukee, Wisconsin, from 70th Street (west terminus) to 16th Street (east terminus), which includes the Stadium Interchange (Project), as illustrated in Attachment 1; and

WHEREAS, off-interstate intersection improvements are included in this Project at the intersections of National Avenue and Miller Park Way, National and Greenfield avenues, and Greenfield Avenue at 70th Street intersections, as well as the Washington Street extension; and

WHEREAS, FHWA is the lead agency on this Project and is, therefore, responsible for compliance with Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and its implementing regulations provided in 36 Code of Federal Regulations (CFR) Part 800; and

WHEREAS, FHWA as the lead agency on this Project is responsible for compliance with Section 110 of the NHPA, particularly Section 110(f) regarding National Historic Landmarks (NHL); and

WHEREAS, FHWA has established the Project's area of potential effects (APE), as defined at 36 CFR 800.16(d), in consultation with the Wisconsin State Historic Preservation Officer (SHPO) and Consulting Parties; the APE includes the properties adjacent to I-94, US 41/Miller Park Way, and other roads crossing over or under I-94 that would be reconstructed, and encompasses the entirety of the identified historic properties that intersect with or are adjacent to I-94 (see Attachment 2); and

WHEREAS, FHWA has determined that the development of a Programmatic Agreement (PA), in accordance with 36 CFR 800.14(b)(1)(ii), is warranted because some details of the Project cannot be determined until final design and the effect on historic properties is conditional, based on completion of the stipulations contained herein; and

WHEREAS, FHWA has identified the following historic properties within the APE: Northwestern Branch, National Home for Disabled Volunteer Soldiers' National Historic Landmark (Soldiers' Home NHL); Northwestern Branch, National Home for Disabled Volunteer Soldiers' National Register Historic District (Soldiers' Home Historic District); Soldiers' Home Reef NHL; Calvary Cemetery; Story Hill Residential Historic District 1; Story Hill Residential Historic District 2 and 3; and Paradise Theater; and

WHEREAS, FHWA has determined that the Project will have no adverse effect on the Soldiers' Home Reef NHL; Calvary Cemetery; Story Hill Residential District 1; Story Hill Residential District 2 and 3; and the Paradise Theater; and

WHEREAS, FHWA has determined that the Project will have no adverse effect on the Soldiers' Home NHL and the Soldiers' Home National Register Historic District based on implementation of the conditions in this agreement; and

WHEREAS, the purpose of this PA is to ensure the Project will have no adverse effect on historic properties as determined by FHWA in the *Revised Assessment of Adverse Effects for the I-94 East-West Corridor Project*, dated September 24, 2014 and the Addendum to that document, dated November 02, 2015; and

WHEREAS, Story Hill Residential Historic District 2 and 3 is eligible for the construction of a noise barrier to reduce noise levels at benefitted receptors, and effects related to Section 106 regarding the construction of a noise barrier have not been determined; and

WHEREAS, letters describing the Project and its objectives and inviting participation were sent to the following federally-recognized Indian Tribes: Bad River Band of Lake Superior, Chippewa Indians of Wisconsin; Sac & Fox Nation of Oklahoma; Sokaogon Chippewa Community, Mole Lake Band; Forest County Potawatomi, Community of Wisconsin; Ho-Chunk Nation; Lac Vieux Desert Band of Lake Superior Chippewa Indians; Menominee Nation; Prairie Band Potawatomi Nation; Red Cliff Band of Lake Superior, Chippewa Indians of Wisconsin; Sac & Fox Nation of Mississippi in Iowa; and Sac & Fox Nation of Missouri in Kansas and Nebraska; and

WHEREAS, the Forest County Potawatomi, Community of Wisconsin has participated in Section 106 consultation and has been invited to sign this PA as a Concurring Party to this PA; and

WHEREAS, FHWA has consulted with the Advisory Council on Historic Preservation (Council), SHPO, National Park Service, National Trust for Historic Preservation, City of Milwaukee Historic Preservation Commission, Archdiocese of Milwaukee Catholic Cemeteries, Beth Hamedrosh-Hagodel Cemetery, Wood National Cemetery, Department of Veterans Affairs Medical Center, Department of Veterans Affairs National Cemetery Administration, and Milwaukee Preservation Alliance in accordance with 36 CFR Part 800.6(b)(2); and

WHEREAS, the Council has elected to participate in the Section 106 consultation process and is a Signatory to this PA; and

WHEREAS, as the agency having oversight of the Soldiers' Home NHL, the National Park Service has participated in consultation and is an Invited Signatory to this PA; and

WHEREAS, Wisconsin Department of Transportation (WisDOT) participated in the Section 106 consultation and is an Invited Signatory to this PA; and

WHEREAS, the National Cemetery Administration (NCA) participated in the Section 106 consultation and is an Invited Signatory to this PA; and

WHEREAS, the Department of Veteran Affairs (VA) Medical Center has participated in the Section 106 consultation, and is an Invited Signatory to this PA; and

WHEREAS, the following are Consulting Parties, have participated in the Section 106 consultation process, and have been invited to sign this PA as Concurring Parties, in accordance with 36 CFR 800.6(c)(3): Milwaukee Preservation Alliance, Archdiocese of Milwaukee Catholic Cemeteries, National Trust for Historic Preservation, City of Milwaukee Historic Preservation Commission, and Beth Hamedrosh-Hagodel Cemetery; and

WHEREAS, in this PA, "Signatories" refers to: Signatories, as defined in 36 CFR 800.6(c)(1) and Invited Signatories, as defined in 36 CFR 800.6(c)(2); and

NOW, THEREFORE, FHWA, SHPO, the Council, and WisDOT agree that, upon FHWA's decision to proceed with the Project, FHWA shall ensure that the following stipulations are implemented in order to take into account the effects of the Project on historic properties, and that these stipulations shall govern the Project:

STIPULATIONS

FHWA in coordination with WisDOT shall ensure the following stipulations are implemented to ensure adverse effects from the Project to the Soldiers' Home NHL, the Soldiers' Home National Register Historic District and the other identified historic properties are avoided.

I. DESIGN REVIEW

A. Design Coordination Plan

WisDOT or its agent will create a Design Coordination Plan in order to ensure the Project is designed in a way that will not adversely affect historic properties. The draft Design Coordination Plan will be submitted to Signatories and Consulting Parties for review and comment in accordance with Stipulation VI prior to implementation and will include:

1. Zablocki Drive Bridge and approaches
2. Height of I-94 adjacent to Wood National Cemetery of the Soldiers' Home NHL and Historic District
3. Access to Soldiers' Home NHL and Historic District
4. Locations covered by the plan
5. Benchmarks for review
6. Timeframe for review
7. Definition of design review process

B. Implement Design Coordination Plan

II. PREPARE CONSTRUCTION STAGING PLAN

WisDOT or its agent will prepare a Construction Staging Plan prior to initiation of construction in the vicinity of historic properties. The Construction Staging Plan will cover the locations of the construction staging areas for storage and staging of active construction in order to avoid impacts to historic properties. The draft Construction Staging Plan will be submitted to Signatories and Consulting Parties for review and comment in accordance with Stipulation VI prior to implementation of the plan and will include, but not be limited to:

- A. Identification of locations and sizes of staging areas for storage of construction materials and equipment outside WisDOT right-of-way to avoid adverse effects to historic properties
- B. Staging of active construction activities within WisDOT right-of-way
 1. Location and timing of staging activities
 2. Connectivity between the two sides of Wood National Cemetery (north and south of I-94) will be provided during construction and stipulated in the plan.
- C. If any staging area or construction activity is located within a cemetery boundary WisDOT will submit the state Request to Disturb a Human Burial Site form, in accordance with Wisconsin Statute 157.70.
- D. The Construction Staging Plan will be incorporated into appropriate documents
- E. Implement the Construction Staging Plan

III. PRE-CONSTRUCTION WALK THROUGH

WisDOT or its agent will define the parameters and goals for up to two pre-construction walk-through(s) with the Signatories and Consulting Parties to this PA prior to the commencement of construction activities. Criteria for pre-construction walk through parameters include:

- A. Goals of the walk through(s)
- B. Area(s) covered by the walk through(s)
- C. Participants of the walk through(s)
- D. Timeframe for the walk through(s)

IV. SOLDIERS' HOME NATIONAL HISTORIC LANDMARK AND NATIONAL REGISTER HISTORIC DISTRICT

A. Wood National Cemetery

1. Landscape Plan

WisDOT or its agent will prepare a Landscape Plan for areas adjacent to I-94 for adoption prior to completion of the freeway design for the portion of the Project adjacent to Wood National Cemetery. WisDOT or its agent will submit the draft Landscape Plan to Signatories and Consulting Parties for review and comment in accordance with Stipulation VI prior to implementation of the plan. The Landscape Plan will include, but not be limited to:

- a. Area covered by the Plan
- b. Landscape Plan will be consistent with the historic character of the Soldiers' Home NHL and Historic District landscape as defined in the Soldiers' Home Historic American Landscape Survey
- c. Implement the Landscape Plan

2. Wall Design Plan

Create a Design Plan for the walls on the north and south sides of I-94. The draft plans will be submitted to Signatories and Consulting Parties for review and comment in accordance with Stipulation VI prior to implementation.

- a. Create a Design Plan for the walls that will include specifications for the design, height, size, materials, and appearance of the walls. The draft Design Plan for the Wood National Cemetery walls will be submitted to Signatories and Consulting Parties for review and comment, in accordance with Stipulation VI, prior to implementation.
- b. Implement the Wall Design Plan.

3. Prepare Signage Plan

WisDOT or its agent will prepare a Signage Plan prior to completion of the of the freeway design. The draft Signage Plan will be submitted to Signatories and Consulting Parties for review and comment, in accordance with Stipulation VI, prior to implementation of the plan and will include, but not be limited to:

- a. Area covered by the Plan
- b. Types of signage covered by the Plan
 - i. Type 1 highway signage
 - ii. NHL/Wood National Cemetery signage

- c. Location of signage
- d. Minimize Type 1 highway signage where I-94 passes through Wood National Cemetery
- e. Design of signage
- f. Implement the Signage Plan

4. Prepare Monitoring Plan

WisDOT or its agent will prepare a Monitoring Plan prior to completion of I-94 design for the segment of the Project adjacent to the NHL and Historic District. The draft Monitoring Plan will be submitted to Signatories and Consulting Parties for review and comment in accordance with Stipulation VI prior to implementation of the Plan. The Monitoring Plan will include:

- a. Area(s) covered by the Plan
- b. Construction activities covered under the Plan
- c. Obtain proper permits and authorizations
- d. Assess appropriate vibration criteria, if applicable
- e. Monitoring provisions
- f. Determine if any buildings or structures would be included in the Plan
- g. Raise and align survey for grave markers within Wood National Cemetery
- h. Implement the Monitoring Plan

B. National Avenue at Miller Park Way Improvements Plan

As part of the off-interstate intersection improvements, WisDOT will prepare a plan for the improvements to National Avenue. The draft Plan will be submitted to Signatories and Consulting Parties for review and comment in accordance with Stipulation VI prior to implementation of the Plan. The plan will ensure no adverse effects on the Soldiers' Home NHL from on the off-interstate intersection improvements at National Avenue and General Mitchell Drive, and will include measures to:

- 1. Minimize the footprint of the widening
- 2. Minimize impacts to identified heritage trees within the Soldiers' Home NHL, as defined in the Soldiers' Home Historic American Landscape Survey
- 3. Minimize visual impact on the Soldiers' Home NHL through additional landscaping features, in accordance with the Historic American Landscape Survey
- 4. Implement the Improvements Plan

V. STORY HILL RESIDENTIAL HISTORIC DISTRICT 2 AND 3

A. Noise Barrier Design Plan

WisDOT or its agent will prepare a Noise Barrier Design Plan after execution of this PA. The draft Noise Barrier Design Plan will be submitted to Signatories and Consulting Parties for review and comment in accordance with Stipulation VI prior to voting by the benefitted receptors. Should the benefitted receptors vote in favor of a noise barrier, the FHWA and WisDOT shall assess its impacts to the Story Hill Residential Historic Districts, consider means to avoid or minimize any adverse effects, and as appropriate develop and carry out a

treatment plan in consultation with the Signatories and Consulting Parties consistent with the provisions of 36 CFR 800.

1. The Noise Barrier Design Plan will address the visual effects of the noise barrier on the setting of the historic district. The plan will include, at a minimum:
 - a. Area covered by the noise barrier.
 - b. Visual effects on the setting of the historic district.
 - c. Range of aesthetics options to be presented at the noise barrier public involvement meeting.
 - d. Noise barrier will be sited outside of the boundaries of the historic district.
2. If a simple majority of the benefitted receptors vote in favor of the noise barrier, implement noise barrier plan.
3. If there is not a simple majority of the benefitted receptors in favor of the noise barrier, the barrier will not be constructed.

VI. CONSULTATION AND REVIEW

- A. FHWA will consult with the Signatories and the Consulting Parties as required by the stipulations of this PA.
- B. FHWA will submit reports and plans to the Signatories and Consulting Parties for review and comment. Respondents will have thirty (30) calendar days to review and comment on submissions.
 1. FHWA will respond in writing to written comments.
 2. There will be an opportunity for Signatories and Consulting Parties to review the responses to the comments submitted under VI.B.
- C. In the event of unresolved disagreement among the parties regarding the comments on a particular stipulation, the matter will be addressed in accordance with Stipulation X, Dispute Resolution.

VII. UNANTICIPATED DISCOVERIES AND UNANTICIPATED EFFECTS

- A. WisDOT will insert into all contracts for excavation, construction, or other ground-disturbing activities during the Project the procedures described below for the treatment of unanticipated discoveries and effects to archeological resources. WisDOT will ensure the processes described below are followed in order to minimize the risk of construction delay if archaeological sites that are eligible for listing in the NRHP are discovered during project implementation.
 1. If significant archaeological resources are discovered during construction within the APE, WisDOT shall halt all work involving ground disturbance in the immediate area of the discovery until the archeological resources can be identified, documented, and an appropriate mitigation strategy is developed for consultation. WisDOT will consult with the Consulting Parties regarding the findings and recommendations.
 2. Upon making the discovery, WisDOT shall notify the Consulting Parties regarding the following:
 - a. Assessment of whether the data available permit a determination of eligibility for the NRHP, and, if not, plans to complete an archeological report of investigations of the identified resources, or

- b. If the resources are eligible for listing in the NRHP, the actions that WisDOT proposes to resolve the potential adverse effects
 3. Interested parties shall have five (5) business days (not including a federal holiday) from receipt of written notification to respond to WisDOT.
 4. WisDOT shall take into account recommendations provided by the Consulting Parties. FHWA shall make a final decision on proposed actions.
- B. Disputes regarding the final decision will be resolved in accordance with Stipulation X Dispute Resolution.

VIII. DISCOVERY OF HUMAN REMAINS

- A. WisDOT will insert into all contracts for excavation, construction, or other ground-disturbing activities in the (Project) the procedures described below for the treatment of inadvertent/accidental human remain discoveries. WisDOT will ensure the processes described below are followed in order to minimize harm and damage/disturbance to human burial sites.
- B. If human remains are inadvertently/accidentally discovered during implementation of the Project, all ground disturbing activities in the immediate area of the discovery shall halt until the following actions have been carried out, in accordance with Wisconsin Statute 157.70 and the Native American Graves Protection and Repatriation Act, as required. SHPO will be contacted immediately after work stoppage. WisDOT shall immediately implement measures to protect the human remains from inclement weather and vandalism, and notify appropriate law enforcement officials to determine whether or not the remains are subject to a criminal investigation by local or federal authorities. NCA will be notified and consulted if human remains are discovered within or adjacent to Wood National Cemetery.
- C. WisDOT shall provide sufficient information to allow law enforcement to determine if the remains are or are not subject to a criminal investigation by local or federal authorities.
 1. If it is determined the human remains are not subject to a criminal investigation by local or federal authorities, FHWA/WisDOT shall obtain the services of qualified cultural resource professionals to comply with all applicable federal (Native American Graves Protection and Repatriation Act when relevant), state (Wisconsin Statute 157.70), and local laws governing the discovery and disposition of human remains.
 2. If it is determined Native American human remains or funerary objects have been discovered in a parcel/land owned by the federal government, FHWA/WisDOT shall immediately notify the appropriate federal land manager, affected Indian tribes, and consulting parties of this PA (within 24 to 48 hours; not including a holiday).
 3. If it is determined human remains have been discovered on state, state sub-division, or private lands FHWA/WisDOT shall immediately notify the SHPO, and the consulting parties of this PA (within 24 to 48 hours; not including a holiday).
- D. Before making any final decision regarding the treatment of human remains, FHWA/WisDOT shall within five (5) business days (not including a federal holiday) after discovery of such remains initiate consultation with the Council, SHPO, Indian tribes (if applicable), and Consulting Parties to prepare and implement treatment measures and treatment plans in accordance with applicable federal, state (Wisconsin Statute 157.70) and local laws.

IX. REPORTING

- A. Bi-annual Reports. In order to monitor completion of the stipulations contained in this PA, WisDOT, on behalf of FHWA, will prepare and submit two (2) reports per year to Signatories

and Consulting Parties summarizing the actions taken to fulfill the stipulations of this PA. The Signatories may agree to change the frequency of the reports to annually.

- B. Annual Meetings. WisDOT will hold annual meetings with the Signatories and Consulting Parties to discuss activities carried out pursuant to this PA during the preceding year and activities scheduled for the coming year. Bi-annual reports, as described in Stipulation IX.A., shall be distributed to the Signatories and Consulting Parties at least fifteen (15) calendar days prior to the annual meeting.
- C. Schedule. The timeframe for the annual reports and annual meetings will commence from the execution date of this PA.
- D. Final Report. A final report describing the completion of the stipulations contained in this PA will be submitted to Signatories and Consulting Parties three (3) months prior to the PA expiration date.

X. DISPUTE RESOLUTION

- A. Should any Signatory to this PA object within thirty (30) calendar days to any documentation or materials submitted for review, actions proposed, or review comments submitted pursuant to this PA, FHWA shall consult with the objecting party and/or parties to resolve the objection.
- B. If FHWA determines that the objection cannot be resolved, FHWA shall forward documentation relevant to the dispute and request comment from the Council. Within forty-five (45) days after receipt of pertinent documentation, the Council will either provide FHWA with comments that FHWA will take into account in reaching a final decision regarding the dispute, or notify FHWA that it will comment pursuant to 36 CFR 800.7(c), and proceed to comment. Any Council comment provided in response to such a request shall be taken into account by FHWA in accordance with 36 CFR 800.7(c)(4) with reference to the subject of the dispute. Any Council recommendation or comment will be understood to pertain only to the subject of the dispute; FHWA's responsibility to carry out other actions under this PA that are not subjects of the dispute will remain unchanged.
- C. FHWA shall notify the Signatories and Consulting Parties of its final decision.

XI. AMENDMENTS

Any Signatory to this PA may propose that it be further amended, whereupon the Signatory shall consult with the other Signatories within thirty (30) calendar days of the proposal to consider an amendment. Any such amendment shall be effective on the date a fully executed copy is filed with the Council.

XII. TERMINATION

- A. If any Signatory to the PA determines that the PA's terms will not or cannot be carried out, that party shall immediately consult with the other Signatories to attempt to develop an amendment, per Stipulation XI. If an amendment cannot be reached, any Signatory may terminate the PA upon written notification to the other Signatories.
- B. Once the PA is terminated, and prior to work continuing on the Project, FHWA must either: 1) execute a subsequent agreement pursuant to 36 CFR 800.6, or 2) request, take into account, and respond to the comments of the Council under 36 CFR 800.7.
- C. FHWA shall notify the Signatories and Consulting Parties of its final decision.

XIII. MONITORING

Signatories may request to monitor activities carried out pursuant to this PA. If FHWA determines that monitoring will cause safety and scheduling concerns, FHWA will cooperate with the Signatories to carry out their monitoring and review requests.

XIV. PERSONNEL QUALIFICATIONS

All historic properties work performed pursuant to this PA will be carried out by or under the direct supervision of historians, architectural historians, historic landscape architects, and/or archeologists, as appropriate to the affected resource(s), who meet or exceed the *Secretary of the Interior's Historic Preservation Professional Qualification Standards* set forth in 62 Fed. Reg. 33,707 (June 20, 1997), as they may be amended.

XV. PRINCIPLES AND STANDARDS

FHWA and WisDOT agree that historic properties investigations performed pursuant to this PA shall be conducted in a manner consistent with the principles and standards contained in *Secretary of the Interior's Standards for the Treatment of Historic Properties* (36 CFR Part 68), *Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation* (1983, as amended), and *Recommended Approach for Consultation on Recovery of Significant Information from Archeological Sites* (ACHP May 18, 1999, 64 FR 27085-27087), and Chapter 26 of WisDOT's Facilities Development Manual.

XVI. ELECTRONIC COPIES

- A. Programmatic Agreement: FHWA or WisDOT shall provide each Signatory and Concurring Party with one legible, full-color, electronic copy of the fully-executed PA and its attachments no more than thirty (30) days after execution. If the electronic copy is too large to send via e-mail, FHWA or WisDOT shall provide each Signatory and Concurring Party with a copy of the executed PA via a compact disc. Parties may request hard copies of the executed PA.
- B. Reports and Plans: Draft and final reports and plans stipulated in this agreement to be submitted for review and comment shall be submitted to the appropriate parties, in accordance with each stipulation, in electronic format. Signatories and Consulting Parties may request hard copies of the reports and plans.

XVII. DURATION

The terms of this PA shall commence on the date the last signature is affixed hereto and shall expire when all Stipulations are completed, or ten (10) years from the date of execution, whichever occurs first, unless the Signatories agree in writing to an extension, or the PA is otherwise terminated.

Execution of this PA by FHWA, SHPO, the Council, and WisDOT prior to FHWA approval of this Project, and implementation of its terms, evidences that FHWA has taken into account the effects of this Project on historic properties and has afforded the Council an opportunity to comment on the Project.

SIGNATORY PAGE

PROGRAMMATIC AGREEMENT
AMONG
FEDERAL HIGHWAY ADMINISTRATION,
WISCONSIN STATE HISTORIC PRESERVATION OFFICER,
AND
ADVISORY COUNCIL ON HISTORIC PRESERVATION
REGARDING
WISCONSIN DEPARTMENT OF TRANSPORTATION PROJECT ID #1060-27-00
WHS #13-0065

I-94 EAST-WEST CORRIDOR STUDY
(70th Street to 16th Street)
CITY OF MILWAUKEE
MILWAUKEE COUNTY

Federal Highway Administration

By: Michael Davies
Signature

Print Name: MICHAEL DAVIES


Date: 07/11/2016

SIGNATORY PAGE

PROGRAMMATIC AGREEMENT
AMONG
FEDERAL HIGHWAY ADMINISTRATION,
WISCONSIN STATE HISTORIC PRESERVATION OFFICER,
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WISCONSIN DEPARTMENT OF TRANSPORTATION PROJECT ID #1060-27-00
WHS #13-0065

I-94 EAST-WEST CORRIDOR STUDY
(70th Street to 16th Street)
CITY OF MILWAUKEE
MILWAUKEE COUNTY

Wisconsin State Historic Preservation Officer

By: 
Signature

Print Name: Jim Draeger

Date: 7/11/16

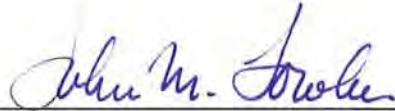
SIGNATORY PAGE

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WHS #13-0065

I-94 EAST-WEST CORRIDOR STUDY
(70th Street to 16th Street)
CITY OF MILWAUKEE
MILWAUKEE COUNTY

Advisory Council on Historic Preservation

By:



Signature

Print Name:

JOHN M. FOWLER

Date:

8/23/16

INVITED SIGNATORY PAGE

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WHS #13-0065

I-94 EAST-WEST CORRIDOR STUDY
(70th Street to 16th Street)
CITY OF MILWAUKEE
MILWAUKEE COUNTY

Invited Signatory:

Wisconsin Department of Transportation

By: *Sheri Schmit P.E.*
Signature

Print Name: SHERI SCHMIT

Date: 7/8/16

By: *Steven W. Krebs*
Signature

Print Name: Steven W. Krebs

Date: July 11, 2016

INVITED SIGNATORY PAGE

PROGRAMMATIC AGREEMENT
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WISCONSIN DEPARTMENT OF TRANSPORTATION PROJECT ID #1060-27-00
WHS #13-0065

I-94 EAST-WEST CORRIDOR STUDY
(70th Street to 16th Street)
CITY OF MILWAUKEE
MILWAUKEE COUNTY

Invited Signatory:

National Park Service

By: _____
Signature

Print Name: _____

Date: _____

INVITED SIGNATORY PAGE

PROGRAMMATIC AGREEMENT
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WHS #13-0065

I-94 EAST-WEST CORRIDOR STUDY
(70th Street to 16th Street)
CITY OF MILWAUKEE
MILWAUKEE COUNTY

Invited Signatory:

Department of Veterans Affairs Zablocki Medical Center

By:



Signature

Print Name:

Daniel S. Zomchak

Date:

8/1/16

INVITED SIGNATORY PAGE

PROGRAMMATIC AGREEMENT
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FEDERAL HIGHWAY ADMINISTRATION,
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WISCONSIN DEPARTMENT OF TRANSPORTATION PROJECT ID #1060-27-00
WHS #13-0065

I-94 EAST-WEST CORRIDOR STUDY
(70th Street to 16th Street)
CITY OF MILWAUKEE
MILWAUKEE COUNTY

Invited Signatory:

National Cemetery Administration

By: Diana J Ohman, Dir. MWD
Signature
Print Name: Diana J Ohman
Date: 7/25/2016

CONCURRING PARTY SIGNATURE PAGE

PROGRAMMATIC AGREEMENT
AMONG
FEDERAL HIGHWAY ADMINISTRATION,
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WISCONSIN DEPARTMENT OF TRANSPORTATION PROJECT ID #1060-27-00
WHS #13-0065

I-94 EAST-WEST CORRIDOR STUDY
(70th Street to 16th Street)
CITY OF MILWAUKEE
MILWAUKEE COUNTY

Concurring Party:

Forest County Potawatomi, Community of Wisconsin

By:

Signature

Print Name:

Date:

CONCURRING PARTY SIGNATURE PAGE

PROGRAMMATIC AGREEMENT
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I-94 EAST-WEST CORRIDOR STUDY
(70th Street to 16th Street)
CITY OF MILWAUKEE
MILWAUKEE COUNTY

Concurring Party:

Archdiocese of Milwaukee Catholic Cemeteries

By: _____
Signature

Print Name: _____

Date: _____

CONCURRING PARTY SIGNATURE PAGE

PROGRAMMATIC AGREEMENT
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WHS #13-0065

I-94 EAST-WEST CORRIDOR STUDY
(70th Street to 16th Street)
CITY OF MILWAUKEE
MILWAUKEE COUNTY

Concurring Party:

Beth Hamedrosh-Hagodel Cemetery

By: _____
Signature

Print Name: _____

Date: _____

CONCURRING PARTY SIGNATURE PAGE

PROGRAMMATIC AGREEMENT
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I-94 EAST-WEST CORRIDOR STUDY
(70th Street to 16th Street)
CITY OF MILWAUKEE
MILWAUKEE COUNTY

Concurring Party:

City of Milwaukee Historic Preservation Commission

By: _____
Signature

Print Name: _____

Date: _____

CONCURRING PARTY SIGNATURE PAGE

PROGRAMMATIC AGREEMENT
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WISCONSIN DEPARTMENT OF TRANSPORTATION PROJECT ID #1060-27-00
WHS #13-0065

I-94 EAST-WEST CORRIDOR STUDY
(70th Street to 16th Street)
CITY OF MILWAUKEE
MILWAUKEE COUNTY

Concurring Party:

Milwaukee Preservation Alliance

By: _____
Signature

Print Name: _____

Date: _____

CONCURRING PARTY SIGNATURE PAGE

PROGRAMMATIC AGREEMENT
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I-94 EAST-WEST CORRIDOR STUDY
(70th Street to 16th Street)
CITY OF MILWAUKEE
MILWAUKEE COUNTY

Concurring Party:

National Trust for Historic Preservation

By: _____
Signature

Print Name: _____

Date: _____

Attachment 1
Preferred Alternative



Off-Interstate Improvements for Preferred Alternative

Attachment 2
Area of Potential Effects Map
