



TRANSPORT 2000 ONTARIO

Advocating Environmentally, Socially & Economically Sustainable Transportation
Box 6418, Station "A" Toronto, ON, M5W 1X3

January 5, 2009.

Mr. Roger Ward
Senior Project Manager
Ontario Environmental Report for DRIC Project
Ontario Ministry of Transportation
949 McDougall Ave., #200
Windsor, ON, N9A 1L9.

Dear Mr. Ward:

Transport 2000 Ontario is a non-profit public advocacy group promoting environmental, economic and socially sustainable transportation. Transport 2000 was incorporated in 1992 but has functioned as an advocacy group since the 1970s. We are part of a network of regional organizations across the country.

Our response to the Ontario EA Report for the DRIC Project is attached. Unfortunately, we missed the deadline for responses as we did not hear about the publication of the EA Report until very recently and it has taken some time for an all-volunteer group to respond to this detailed document.

In addition to our response, we wish to draw your attention to a submission from [REDACTED] of Ann Arbor, Michigan that is dated December 12, 2008. His submission consists of comments regarding MTO's Draft Environmental Review for the DRIC project and two submissions to the State of Michigan's environmental reviews, 23 pages in all. We are sending it to you in an email version of this mailing.

In the event you are not authorized by law to consider comments from U.S. and Michigan residents to the same degree that you consider comments from Canadian citizens, we are hereby resubmitting [REDACTED]'s comments and want you to consider his comments to be from transport 2000 Ontario as well. We would appreciate receiving your response to each of the comments presented in [REDACTED]'s submission.

Sincerely,
Natalie Litwin
President, Transport 2000 Ontario
416-498-0612
n.litwin@sympatico.ca

43 English Ivyway
Toronto, ON, M2H 3M3.

cc Hon. John Gerretsen, Minister of the Environment.
Hon. Jim Bradley, Minister of Transportation

Transport 2000 Ontario Response
Detroit River International Crossing (DRIC) Draft Environmental Assessment Report
(Ontario)
of November 2008

Transport 2000 Ontario is a sustainable transportation advocacy non-profit organization that has been active since the 1970s. We are the Ontario region of a network of five regions with a national office in Ottawa.

The following key points summarize our response to the draft report:

- The recent major economic downturn that has impacted the manufacturing sector in Southern Ontario requires a reassessment of travel demand forecasts across the busy Windsor/Detroit border crossing. According to a December 28 article in the Winnipeg Free Press, truck movements over the Ambassador Bridge have dropped 14.9 % in the past 12 months, a continuation of a decline in the past few years. Since manufacturing comprises 50% of the employment in the Windsor area and is a significant employer in the entire southern Ontario region, traffic statistics will continue to show a decline.
- Even if this decline were not occurring, there are solutions that would obviate the need for DRIC's road-based solution to the traffic congestion.
- The new road-based solution to the congested crossing recommended in this draft EA is a business-as-usual solution. This approach has been rejected by many planners, academics and environmentalists as perpetuating the problem.
- The US Department of Transportation announcement on December 15, 2008 is making a passenger rail alternative between Detroit and Windsor a reality. A Chicago Hub high-speed rail corridor: Chicago, Detroit, Cleveland, Kansas City, St. Louis, etc. would link the border crossing cities and continue on to a possible Windsor-Quebec City HSR corridor that is presently anticipated.
- Upgrading of the rail tunnels at Windsor also has the potential to spur development of fast or high-speed passenger train service through Windsor as an extension of the Windsor-Quebec City rail corridor west to Detroit and Chicago. Although it is beyond the scope of the draft EA, it is useful to note that having Windsor as a hub in a much-needed HSR route would offer the very attractive advantage of benefiting Windsor's economy as the automobile industry winds down.
- Given that oil depletion is now underway for the long term, and given the necessity for Canada to reduce its carbon footprint in order to help curb global warming, it is urgent that scarce public funds be invested in transportation infrastructure that provides alternatives to the highway mode. The DRIC proposal for a new highway promotes increasing pollution and energy inefficient transport. It is in violation of our obligations under the Kyoto Protocol. It is the wrong solution at the wrong time.
- The findings of this draft EA are biased toward road-building. Repeatedly, the EA claims that alternative solutions will not provide enough relief to the border traffic congestion. However, this claim is based on traffic predictions that

are no longer valid. Furthermore, the claims are based in some cases, on inadequate exploration of the alternatives. (Please see [REDACTED]'s responses to the U.S. and Ontario draft EAs, attached)

Some solutions that this report finds inadequate:

Transportation Demand Management

TDM is widely acknowledged to be a useful tool in reducing road traffic. If it works elsewhere, why not here? Of course it would have to be Ontario-wide and also receive support in Michigan and neighbouring states. Encouraging teleworking, flextime, ridesharing, time-of-day road tolls, distance-based vehicle insurance, are just some effective strategies for reducing road traffic in the entire region. In the Detroit River Crossing area, higher tolls at peak times would reduce congestion as would diverting traffic from the Ambassador to the Blue Water Bridge at Sarnia.

Public Transportation Options

Transit service for commuters between the two cities and neighbouring towns is in its infancy. The tunnel bus service should be expanded. A bus service across the Ambassador bridge could be introduced. There could be a shuttle rail service and expanded commuter rail service for those living in one city and working in the other. The report admits that transit improvements could make use of existing transportation corridors at reasonable cost and in a relatively short time but goes on to state that these improvements would not be effective. Why not? If one bus has the potential to take 30+ cars off the road, why not put more buses and rail to work rather than build a multi-billion dollar highway?*

Truck Ferry

The report states that the Windsor-Detroit truck ferry operates at 25% capacity and additions or improvements are technically feasible. However, by assuming outdated growth projections, the authors believe that the ferry could not provide for long-term needs. Those needs now have to be revisited in light of significantly slower growth, and an improved ferry service could very well provide adequate service. The argument that an increased ferry service would require increased staffing of border officers is weak since staff could be diverted from decreased traffic elsewhere in the region.

Goods Movement

Given that the cost of shipping by truck will rise with the inevitable rise of fuel costs, diversion of containers and truck trailers to the much more efficient rail mode should be a matter of policy. Diversion to rail and intermodal rail/truck shipping could be achieved at a fraction of the cost of a new bridge and its connecting highways as twin rail tunnels already exist at Windsor and are capable of accommodating all containers except double stack domestic containers. [REDACTED] of Ann Arbor, Michigan, identifies in his comments on the U.S. EA one border partnership (DRIC) study that estimates that 44% of truck traffic now using the Ambassador Bridge is suited to being carried by rail in that it has a trip end either in or beyond Toronto. The EA counters this assessment in

part with the claim that the vast majority of traffic at the Detroit/Windsor Tunnel is non-divertible.

**The US Draft Environmental Impact Statement for the DRIC project states that the US share of the total project cost is \$1,488 million U.S. Of that amount \$282 to \$344 million is for the US share of the bridge structure.*

The cost for the Canadian part of the DRIC project, is addressed in a draft "Cost Study" dated May 2008 which is published at:

http://www.partnershipborderstudy.com/pdf/Cost/WEB_PracticalAltsWP_PrelimConst_Cost_May2008-reporttextonly.pdf

The draft "Cost Study" report states that the inspection plaza on the Canadian side will cost \$180 to \$280 million Cdn. and that the cost of the access road will be between \$1,500 and \$1,600 million if the "Parkway" option is chosen. The May 2008 draft report does not state the Canadian share of the bridge cost. Assuming parity between US and Canadian currency and that the Canadian share of the bridge cost is the same as the US share of the bridge cost, it appears that the total project cost is in the order of \$3,500 million. - [REDACTED]

Natalie Litwin
President, Transport 2000 Ontario
January 5, 2009.

Transport 2000 Ontario response...

Referenced Submission



"Ward, Roger (MTO)"
<Roger.A.Ward@ontario.ca>
15/12/2008 10:35 AM

To "Dave Wake" <Dave.Wake@ontario.ca>,
<Jacquie_Dalton@URSCorp.com>
cc <Murray_Thompson@URSCorp.com>,
<Kevin.Devos@ontario.ca>,
<Holly_Wright@URSCorp.com>,
<Patrick_Puccini@URSCorp.com>

bcc

Subject FW: comments submission regarding Ontario Environmental
Assessment Report for DRIC project

More comments on Draft EA regarding traffic forecasts and Travel Demand.
Roger

From: [REDACTED] [mailto:[REDACTED]] **On Behalf Of** [REDACTED]
Sent: December 12, 2008 11:56 PM
To: River, Detroit (MTO)
Subject: comments submission regarding Ontario Environmental Assessment Report for DRIC project

To: Ontario Ministry of Transportatino
949 McDougall Avenue, Suite 200
Windsor, ON N9A, 1L9
Attention: Mr. Roger Ward, Senior Project Manager
Via: email to detroit.river@ontario.ca
Re: Detroit River International Crossing Study (DRIC)
Draft "Environmental Assessment Report: Individual Environmental Assessment (W.O.
04-33-002)", published November 2008 [referred to below as "Draft Ontario Report"]
Dear Mr. Ward:

I am a US citizen who resides in Southeast Michigan. Notwithstanding my non-Canadian status I respectfully request that you consider the comments offered below, inasmuch as the challenge the Draft Ontario Report addresses is a joint challenge to both the US and Canada and the solution to be selected is one that must be selected together by both nations and by the Province of Ontario and the State of Michigan.

I commented on the Michigan Department of Transportation (MDOT) DRIC Draft Environmental Impact Statement [referred to hereinafter as "Draft Michigan Report"] on 29 April 2008 (15 pages) and 29 May 2008 (5 pages). The attachment to this message is a copy of both sets of comments. They are forwarded for inclusion in the record of comments received by you on the Draft Ontario Report

The Draft Michigan Report relies on the same traffic data and forecasts used in the Draft Ontario Report. Most of my comments on the Draft Michigan Report are equally applicable to the Draft Ontario Report.

My major points are as follows:

- (1) I find it disappointing and a major failure of both the Draft Michigan Report and the Draft Ontario Report that they did not consider a wider range of practical alternatives to a new highway crossing of the Detroit River. Note that Prime Minister Harper and President Bush in their joint DRIC statement issued on 21 August 2007 referred to "enhanced capacity", not "increased highway capacity" [ref: page 4 of my 29 April 2008 comments]
- (2) The attention in the Draft Ontario Report to the option of placing either

truck trailers or entire tractor-trailer assemblies on railroad trains is inadequate, given that the September 2005 "Detroit River International Crossing Study Travel Demand Forecasts" report prepared by IBI Group [hereinafter referred to as "TDF"], states that **"...the commercial vehicle traffic...potentially divertible to rail represents approximately 44% of the current total truck volumes on the Ambassador Bridge.**" [ref: TDF page 122, where it also is stated that "potentially divertible" truck traffic is that traffic moving across the Detroit River with one trip end in or beyond the Greater Toronto Area and the other trip end in or beyond Detroit].

Given your data, it appears that during year 2035 the average hourly truck traffic crossing the Detroit River with one trip end in or beyond the Greater Toronto Area will be approximately 200 movements per direction. That traffic volume would fill one intermodal train leaving each end of the route every 30 minutes. [ref: Section 13 on page 4 of my 29 May 2008 comments]

(3) Canada is a signator of the Kyoto Protocol on Climate Change. The Draft Ontario Report totally ignores the vast reduction (perhaps 90%) in freight traffic fuel consumption and emissions on the Detroit-Toronto route that result from substituting intermodal rail service for trucks on highways. See Section 13 on page 4 of my 29 May 2008 remarks to MDOT for more detail.

(4) Totally ignored in the Draft Ontario Report is the prospect that the increased truck traffic resulting from building the DRIC highway project in lieu of improving railroad service is the fact that the former may very well necessitate widening Highway 401 the entire distance between Windsor and Toronto. Recall from (2) above my reference to the Detroit-Toronto truck traffic in year 2035 being an average of 200 vehicles per hour per direction. Peaking of truck traffic may result in the peak hour truck traffic on Highway 401 being 600 vehicles per direction. The Draft Michigan Report states that one truck takes up as much highway capacity as three automobiles. Thus 600 trucks per hour is the equivalent of approximately 1,800 automobiles per hour, which effectively accounts for the maximum automobile traffic that a highway lane can accommodate per hour.

(5) Much of the peak hour passenger car traffic between Detroit and Windsor is local commuter traffic. See Section 14 in my 29 April 2008 comments and also in my 29 May 2008 comments. A reasonable alternative to a new highway bridge would be the implementation of new public transport service across the Detroit River. One way to implement improved trans-border public transportation service would be to develop a light rail system in Windsor to complement Detroit's planned Woodward Avenue light rail system and to then join the two in a tunnel under the Detroit River.

(6) See my 29 April 2008 and 29 May 2008 letters for additional comments on the Draft Michigan Report that apply equally to the Draft Ontario Report.

(7) Last, the proposed DRIC highway project involves a total cost of at least \$3 billion and perhaps \$5 billion. Those sums very likely far surpass the implementation costs of an intermodal rail service and/or a dedicated public transportation service crossing under the Detroit River to serve the residents of Windsor and Detroit,

Respectfully,

[Redacted signature]

--
[Redacted]

[Redacted]



telephone: [Redacted] 2008.0429+2008.0529DRIC.DEIS.comments.pdf



29 April 2008

Mr. Robert Parsons, Public Involvement/Hearing Officer
Michigan Department of Transportation
PO Box 30050
Lansing, MI 48909 USA
parsonsb@michigan.gov

RE: Detoit River International Crossing (DRIC), Wayne County, Michigan "Draft Environmental Impact Statement and Draft Section 4(f) Evaluation" -- approved by Federal Highway Administration on 15 February 2008

Dear Mr. Parsons:

This letter consists of comments submitted for the record regarding the Draft Environmental Impact Statement identified above.

1. Abbreviations and their Definitions

For convenience, several abbreviations are used through the text of this letter. Facility name abbreviations are as follows:

- AMB the Ambassador Bridge, which is a privately-owned four-lane highway between Detroit and Windsor that opened for traffic in 1929
- BWB the Blue Water Bridge, which is a pair of two adjoining three-lane highway bridges over the St. Clair River between Port Huron, Michigan and Point Edward and Sarnia, Ontario, and which is owned by the governments of Michigan and Ontario. [The older of the two spans was opened for traffic in 1938. The newer of the two spans was opened for traffic in 1997.]
- DRT the Detroit River Tunnel, which is a two-tube railroad tunnel (one railroad track per tube), which opened for railroad traffic in 1909, and which is owned by the Detroit River Tunnel Company (a Michigan corporation)
- DWT Detroit-Windsor Tunnel, which is a two-lane highway tunnel between Detroit and Windsor that opened for traffic in 1930 and that is owned jointly by the Cities of Detroit and Windsor

Abbreviations for organization names, report titles, and other terminology are as follows:

To: Mr. Robert Parsons, MDOT Public Involvement/Hearing Officer
Re: DRIC DEIS

29 April 2008
Page 2 of 15

- CEQ Council on Environmental Quality, a unit of the Office of the President of the United States
- DEIS the Draft Environmental Impact Statement identified immediately before the salutation above
- SEMCOG the "Southeast Michigan Council of Governments", which is a regional planning organization whose planning jurisdiction consists of the following Michigan counties (listed in declining order of population): Wayne (which includes the City of Detroit), Oakland, Macomb, Washtenaw, Livingston, St. Clair, and Monroe
- Local traffic motor vehicle traffic which has both its origin and destination within the area consisting of Essex County in Ontario and all SEMCOG counties, except for St. Clair County
- Long distance traffic motor vehicle traffic which is not "Local traffic" as defined above
- Borealis Borealis Transportation Infrastructure Trust, a Canadian entity which is controlled by the Ontario Municipal Employees Retirement System and which in 2001 purchased from the Canadian National Railroad that railroad's 50 percent interest in the Detroit River Tunnel Company
- DRTP the Detroit River Tunnel Partnership, which appears to be an assumed name for the Detroit River Tunnel Company and which reportedly is co-owned by Borealis and the Canadian Pacific Railway
- DIBC Detroit International Bridge Company, the private organization that owns AMB
- DCTC Detroit & Canada Tunnel Corporation, the entity which is under contract to operate the DWT on behalf of DWT's owners
- TDF a working paper report entitled "Detroit River International Crossing Study Travel Demand Forecasts", prepared September 2005 by IBI Group
<http://www.partnershipborderstudy.com/pdf/TTRexisting&future2005-09-15.pdf>
- PCEs "Passenger car equivalents", which is calculated in the DEIS by determining the sum of the following for a specific period of time (e.g., an hour, a day or a year): the observed or predicted passenger car vehicle traffic volume and 3 times the observed or predicted commercial vehicle traffic volume [For example, if during any given hour the traffic flow consists of 100 automobiles and 50 commercial vehicles, the PCE value for that hour is 250.]

To: Mr. Robert Parsons, MDOT Public Involvement/Hearing Officer
Re: DRIC DEIS

29 April 2008
Page 3 of 15

2. Introduction

The DEIS is a very detailed review of several highway options for building a new truck/automobile bridge over the Detroit River at locations between the existing Ambassador Bridge and the southern tip of Grosse Ile Township, Michigan, as viewed from the US side of the border.

However, the viewpoint expressed immediately above should not be interpreted to imply that the DEIS complies with CEQ requirements for an Environmental Impact Statement as set forth in 40 CFR 1502. [ref: <http://ecfr.gpoaccess.gov>]

The balance of this letter provides elaboration on some of the ways the DEIS should be modified in order to properly respond to CEQ regulations.

3. Context of the DEIS

The context of this DEIS is twofold. First there is an overriding policy context. In addition there is a factual context.

3a. Policy Context:

There are at least three dimensions within the policy context: CEQ requirements; the President's agreement with the Prime Minister of Canada as stated on 21 August 2007; and the US government requirement that any new international border crossing requires a Presidential Permit before it can be constructed.

The first of the three dimensions in the policy context, the CEQ requirements result from the mandate set by Congress in establishing the CEQ. The origin and responsibilities of the CEQ are perhaps best described by quoting from the CEQ website, <http://www.whitehouse.gov/ceq/aboutceq.html>

Congress established CEQ within the Executive Office of the President as part of the National Environmental Policy Act of 1969 (NEPA). Additional responsibilities were provided by the Environmental Quality Improvement Act of 1970.

In enacting NEPA, Congress recognized that nearly all federal activities affect the environment in some way and mandated that before federal agencies make decisions, they must consider the effects of their actions on the quality of the human environment. NEPA assigns CEQ the task of ensuring that federal agencies meet their obligations under the Act. The challenge of harmonizing our economic, environmental and social aspirations has put NEPA at the forefront of our nation's efforts to protect the environment.

Some of the essential provisions of the CEQ requirements for an environmental impact statement establishing the policy context for preparation of the document are as follows:

40 CFR 1502.1: *...an environmental impact statement...shall provide full and fair discussion of significant environmental impacts and shall inform decisionmakers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment.*

40 CFR 1502.2(a): *Environmental impact statements shall be analytic, rather than encyclopedic.*

40 CFR 1502.2(g): *Environmental impact statements shall serve as the means of assessing the environmental impact of proposed agency actions, rather than justifying decisions already made.*

To: Mr. Robert Parsons, MDOT Public Involvement/Hearing Officer
Re: DRIC DEIS

29 April 2008
Page 4 of 15


40 CFR 1502.14: *...agencies shall...(a) Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated.*

40 CFR 1502.14: *...agencies shall...(c) Include reasonable alternatives not within the jurisdiction of the lead agency.*


40 CFR 1502.9: *If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion.*

40 CFR 1502.9: *The agency shall make every effort to disclose and discuss at appropriate points in the draft statement all major points of view on the environmental impacts of the alternatives including the proposed action.*

The second aspect of the policy context is the President's 21 August 2007 statement. The relevant parts of that statement are reproduced immediately below. Note that the statement does not commit the US and Canadian governments to any particular mode of transportation. Also, note that the statement does not commit the government to any specific type of action for "enhanced capacity", such as building a new crossing in lieu of enhancing border processing procedures. Presumably the Michigan Department of Transportation's \$230,000,000 Ambassador Bridge Gateway Project which began during February 2008 qualifies as a "development of enhanced capacity" anticipated in the 21 August 2007 Joint Statement.



THE WHITE HOUSE
PRESIDENT
GEORGE W. BUSH

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For Immediate Release
Office of the Press Secretary
August 21, 2007

Joint Statement by Prime Minister Harper, President Bush, and President Calderón
Montebello, Quebec, Canada

...

Smart and Secure Borders

Our three countries have a long history of cooperative border management, predicated on the understanding that our prosperity and security depend on borders that operate efficiently and effectively under all circumstances....

We ask ministers to continue to pursue measures to facilitate the safe and secure movement of trade and travellers across our borders and, in particular, to:

- ...
- Canada and the US will maintain a high priority on the development of enhanced capacity of the border crossing infrastructure in the Detroit-Windsor region, the world's busiest land crossing.

...

The third and final aspect of the policy context is that if any "development of enhanced capacity" of the border crossing infrastructure involves the construction of a new bridge or tunnel across

To: Mr. Robert Parsons, MDOT Public Involvement/Hearing Officer
Re: DRIC DEIS

29 April 2008
Page 5 of 15

the border, then a Presidential Permit is required. The US Department of State processes applications for Presidential Permits for new bridge and tunnel crossings. A summary of the procedure for obtaining the permit is presented on a US Department of State webpage, <http://www.state.gov/p/wha/rls/fs/7895.htm>.

Environmental reviews prepared pursuant to the CEQ requirements are an integral part of the approval process for a Presidential Permit. Thus it appears reasonable that the DEIS should help the President to decide the type and timing of any new transborder infrastructure installation.

3b. Factual context:

The factual context of the DEIS is that regrettably it is but one of three environmental statements which have been, are, or will be prepared for three proposed international crossing projects.

The second environmental statement is an Environmental Assessment dated April 2007 which the DIBC submitted to the US Coast Guard with regard to its proposal for a second suspension span to be located immediately downstream of AMB. That document is available for review at http://www.ambassadorbridge.com/drafts/Draft_Environmental_Assessment.pdf

The third is a forthcoming environmental statement for a DRTP proposal to replace the existing two-track DRT with a one-track railroad tunnel with a cross-sectional dimensions greater than those of each of the two existing railroad capable of accommodating a large auto carrier railroad freight car referred to as an "Auto-Max" railcar and railroad freight cars that carry double stacks of larger containers. [Most auto carrier and many double-stack container railroad freight cars already are small enough to pass through the DRT.] DRTP's intention regarding the existing tunnel is stated by one of DRTP's two owners to include conversion of the existing tunnel to a truck-only highway. [See Section 4, below.]

Presumably an environmental statement will be required for each of the three Detroit River crossing proposals by the Canadian government in addition to the environmental statements required by the US Federal Highway Administration. Thus, a total of six environmental statements will have been prepared before the President and the Canada's Prime Minister make a decision as to which, if any, of the competing proposals will be implemented.

Unfortunately there simply is no way that the DEIS as it is constructed at this time can address the totality of environmental impacts of the three separate proposals. What is needed is for the US Secretary of Transportation and the Canadian Minister of Transport to jointly retain a qualified and impartial environmental impact evaluator who has no business relationship with any of the businesses and the Michigan and Ontario highway agencies involved in the competing proposals, in order to avoid the impression that the author of the environmental document is advocating a business or bureaucratic interest rather than the welfare of the public residing on both sides of the border.

In conclusion, the DEIS needs to be redone by the Office of the US Secretary of Transportation rather than by the Federal Highway Administration or another modal administration in order to objectively satisfy the CEQ requirements for a DEIS.

To: Mr. Robert Parsons, MDOT Public Involvement/Hearing Officer
Re: DRIC DEIS

29 April 2008
Page 6 of 15

4. The DEIS needs clarification as to what the DRTP proposes to do

The DRTP proposal as of approximately 2005 included a provision to convert the existing two-track DRT to a truck-only highway. The DEIS working paper entitled "Indirect and Cumulative Impact Analysis Technical Report" states in a footnote on page 4-68 [pdf p. 139] that "**The DRTP Truck-only Tunnel proposal has been withdrawn by the proponents.**" Notwithstanding that statement, as of the morning of 28 April 2008 a Borealis webpage, <http://www.borealisinfrastructure.com/assets/transportation.aspx>, stated the following:

Detroit River Rail Tunnel: OMERS jointly owns with Canadian Pacific Railway the 8,500-foot Detroit River Tunnel that links Windsor and Detroit. More than \$130 billion of goods flow annually through this cross-border asset. This trade is expected to triple in the next five years. Additionally, a \$600 million new rail tunnel and high-speed truck route are proposed for completion within five years to assure shippers fast and competitive routing on North America's busiest free-trade corridor. For more information, please visit www.thejobstunnel.com.

The www.thejobstunnel.com webpage reads "under construction".

Notwithstanding the assertion in the above-referenced DEIS working paper that the project sponsor has withdrawn the truck-only tunnel, the DEIS at page 3-191 refers to "...**the construction of the Detroit River Tunnel Partnership proposed truck-only tunnel**" and states that it would not "...**measurably diminish the traffic on the proposed DRIC crossing**..." and that it is not "...**associated with a program to enhance the community which hosts the crossing**."

During February 2008 DRTP requested that a replacement rail tunnel be added to the SEMCOG Regional Transportation Plan for 2030. The project listing has no information regarding the number of tracks in the replacement tunnel, although informal presentations indicate that the replacement tunnel will contain only one track. In addition, no information is provided in the SEMCOG Regional Transportation Plan project listing about the future use or disposition of the existing tunnel. The primary information in the SEMCOG project listing is that the total cost for the part of the project on the US side of the border will be \$172,785,000, that the entire cost will be privately provided, and that the time period for the expenditure is "2006-2010". [ref: <http://www.semco.org/Data/Apps/project.report.cfm?type=RTP&id=4425>]

The problem described above can be cured if both of the two co-owners of the DRT submit for inclusion in the DEIS record a written statement clarifying their intentions regarding the disposition or alternate use of the existing two tubes comprising the existing DRT once the new one-track tunnel is constructed.

5. Rationale for Considering the BWB in the DEIS

The BWB is located approximately 60 miles from the AMB and the DWT. It is over the St. Clair River rather than the Detroit River. Nonetheless it is essentially a local international crossing between Detroit and Canada.

If one uses www.mapquest.com to check the driving distance between the Detroit City Hall (which is located at 2 Woodward Avenue, only three short blocks from the Detroit entrance to

To: Mr. Robert Parsons, MDOT Public Involvement/Hearing Officer
Re: DRIC DEIS

29 April 2008
Page 7 of 15

the DWT) and the Toronto city hall (located at 100 Queen Street West), one finds that the shortest route between the two city halls is via the DWT and Ontario Route 401. However if one makes the trip between the Detroit and Toronto city halls via the BWB and Ontario Route 402 to the point where that route intersects with Ontario Route 401 just west of London, one finds that the total travel distance is only 12.5 miles greater than the route using DWT [i.e., 243.6 miles vs. 231.06 miles]

Effectively there are places within the city limits of Detroit from which travel to London and Toronto involves a shorter trip distance and probably a shorter trip time than travel via either the DWT or the AMB.

This relevance in travel demand forecasting of the above-described geographical fact is discussed in greater detail on TDF pages 56-58 [pdf pp. 65-67]. With the exception of discussion and tables presented on DEIS pages 2-9 through 2-11, the local significance of the BWB for travel from Detroit to London and Toronto is not discussed in the DEIS.

The DEIS should be modified to conspicuously indicate that one reasonable alternative to building new bridges over the Detroit River at this time is to route more traffic over the BWB as long as the BWB has the ability to absorb more traffic. The authors of the TDF address that option in a sensitivity analysis summarized in Section 6.2.3 on page 124 [pdf p.133] of that report.

6. Existing and Projected Traffic on Detroit River Highway Crossings

The DEIS states on page 1-9 that as of 2004 the combined weekday traffic volume on the existing Detroit River border crossings, i.e., AMB+DWT, was as follows:

Automobile:	Total traffic	35,850
	Local traffic	28,450 (79% of total auto traffic)
Truck traffic:	Total traffic	13,000
	Long distance traffic:	6,500 (50% of total truck traffic)

On page 1-10 the DEIS states that the hourly combined capacity of AMB and DWT is 5,000 passenger car equivalents (PCEs) per hour, for which each truck is counted as three automobiles. The TDF explains [on pdf page #s 103 and 104] that the 5,000 PCE capacity estimate is for each direction of travel and that it is calculated by assuming the AMB and DWT capacities are 1,750 PCEs/lane and 1,500 PCEs/lane respectively. Because AMB has two lanes per direction of traffic and DWT has only one lane per direction of traffic, the total capacity for the two facilities combined is 5,000 PCEs/direction/hour.

The DEIS also states, on page 1-10, that the total traffic on AMB+DWT will reach the 5,000 PCE/hour capacity sometime between 2015 and 2035.

Although the TDF on page 55 [pdf p. 64] specifies the border crossing fees (apparently as of 2005) for AMB, DWT, and BWB, there appears to be no information in any of the DEIS documentation regarding the assumptions in the travel demand forecasting process of the border crossing fees for the years for which the traffic forecasts have been made.

To: Mr. Robert Parsons, MDOT Public Involvement/Hearing Officer
Re: DRIC DEIS

29 April 2008
Page 8 of 15

Also, it appears from the DEIS that no consideration in the traffic forecasting was given to differential tolls based on any of the following options, which have been implemented in other major metropolitan areas, for example, the Golden Gate Bridge in San Francisco, CA [ref: http://goldengatebridge.org/tolls_traffic/toll_rates_carpools.php]:

- Time-of-day variation in bridge/tunnel tolls to discourage travel during peak hours
- Lower tolls for vehicles equipped for electronic toll collection
- Lower tolls for a high-occupancy vehicle (i.e., an automobile or SUV with more than one or two persons in it)

A review of the web sites for the AMB, DWT, and BWB indicates that as of 28 April 2008 the toll differs depending on which direction the facility user is traveling for at least DWT and BWB. It also indicates that a discount is given by the operators of all three facilities for the purchase of commuter tokens or tickets. In other words, the facility usage fee policy of each facility operator gives discounts to travelers who tend to travel at peak travel times, a policy that runs counter to the view that transportation facility users who contribute to congestion should pay a greater fee than those who travel at times of no congestion.

Given the absence in the DEIS of an analysis of the sensitivity of peak period travel forecasts to increases in facility user fees during peak travel hours or to user fee decreases during off-peak travel hours, it is not possible to determine how realistic the peak hour travel forecasts contained in the DEIS and its supporting documentation are.

The DEIS should be amended to clarify the traffic forecasting assumptions and to quantitatively evaluate at least the fare policy options identified above.

7. Change in Forecast Base Year from 2004 to 2007 and Revision of Forecast for 2034

The travel demand forecasts presented in the DEIS and the TDF use 2004 as a base year. We now have three more years of data and the DEIS should be amended to establish 2007 as the base year.

Traffic volumes on at least the BWB declined considerably between the end of 2004 and the end of 2007.

The declines in traffic volumes for the BWB have been...

from 3,760,000 in 2004 to 3,423,000 in 2007 for automobiles, and
from 1,800,000 in 2004 to 1,623,000 in 2007 for commercial vehicles.

Presumably similar declines in AMB and DWT traffic volumes also have taken place.

The TDF report presents estimates of the compound annual growth rates (CAGR) in traffic volumes across AMB, DWT, and BWB taken together for the period 2004 to 2015. Exhibit 5-7 on page 83 [pdf p.92] estimates the CAGR for automobile traffic to be 2.9%. Exhibit 5-18 on page 95 [pdf p. 104] indicates that the CAGR for commercial vehicle traffic to be 3.3%. Doing the math leads to the conclusion that the actual BWB auto and commercial vehicle traffic volumes during 2007 were respectively 23% and 25% less than what was forecasted for 2007.

To: Mr. Robert Parsons, MDOT Public Involvement/Hearing Officer
Re: DRIC DEIS

29 April 2008
Page 9 of 15

The DEIS should be modified to present the traffic counts for the AMB, DWT, BWB and amend the forecast for the planning horizon year, 2034.

8. Modification of Forecasts to Reflect Changes in Fuel Prices Since 2004

The Energy Information Administration (EIA) maintains statistics at www.eia.doe.gov regarding gasoline and diesel fuel prices for various locations around the country.

EIA statistics for the US "Midwest (PADD-2)" show that the prices per gallon, including taxes, for "Gasoline All Grades - Conventional Areas" and "Diesel (On-Highway) - All Types" were as follows:

<u>Date</u>	<u>Gasoline</u>	<u>Diesel</u>
Average for 2004	\$1.831	\$1.770
Average for April 2008	\$3.434	\$4.040

The increases in gasoline and diesel fuel prices are extraordinary, being 88% and 128% respectively.

Because significant fuel price changes have an impact on travel demand the travel demand forecasts contained in the DEIS should be redone. In addition, the changes in fuel prices since 2004 give impetus to identify within an amendment to the DEIS the improvement of intermodal freight services as a reasonable alternative to constructing a new highway crossing of the Detroit River.

9. Evaluation of Peak Period Travel for AMB, DWT, and BWB as a Group during 2034

Assumptions regarding the tendency for traffic to move all at once are critical in reaching conclusions regarding the need for additional highway capacity between Detroit and Canada.

Figure 1-3 on page 1-10 of the DEIS illustrates that the peak hourly PCE traffic during 2004 was approximately **3,300 PCEs**.

TDF devotes an entire section entitled "Temporal Patterns of Vehicular Travel" (Section 3.6 on pages 43 to 51 [pdf pp. 52-60]) to observed peak period travel patterns in years 2000 and 2004.

Exhibit 5-23 on ETF page 101 [pdf p.110] states that the traffic volumes were as follows:

AMB + DWT:	11,950,000 passenger cars
	3,530,000 commercial vehicles

Applying the relationship between traffic volume and PCE's as established in the DEIS and repeated above, one may conclude that during 2004 the total PCE's for AMB+DWT was **22,540,000**.

Exhibit 5-23 on ETF page 101 [pdf p. 110] also includes travel demand forecasts for year 2035. Those forecasts are as follows:

To: Mr. Robert Parsons, MDOT Public Involvement/Hearing Officer
Re: DRIC DEIS

29 April 2008
Page 10 of 15

AMB + DWT: 18,740,000 passenger cars
8,060,000 commercial vehicles

BWB: 5,910,000 passenger cars
4,290,000 commercial vehicles

If one applies the procedure specified in the DEIS for calculating PCEs, one finds that the 2034 forecasts summarized above imply that the total PCE's during that year is forecasted to be **61,700,000** [i.e., 18,740,000 + 3(8,060,000) + 5,910,000 + 3(4,290,000)].

As noted above during 2004 we had 3,300 peak hour PCEs for a total AMB+DWT traffic that year of 22,540,000 PCEs. The ratio between annual PCEs and peak hour PCEs that year was therefore **6,830**.

The DEIS and its supporting documentation do not specify the ratio between annual PCEs and peak hour PCEs for year 2034 for AMB, DWT, and BWB taken together. However, as a preliminary assumption we can assume that the ratio will be same in 2034 as it was 2004, i.e., **6,830**. Doing that leads us to conclude that the peak hour PCEs in 2034 will be **9,034** (i.e., 61,700,000 divided by 6,830).

As noted above, the combined capacity of AMB and DWT is 5,000 peak hour PCEs per direction. Assuming that each lane of BWB has the same capacity as each lane of AMB, i.e., 1,750 PCEs per hour, the three lanes per direction at BWB add a total of 5,250 peak hour PCEs per direction of travel, giving us a combined capacity of 10,250 peak hour PCEs.

For AMB, DWT, and BWB taken together, the year 2034 peak hour PCEs projection derived above [i.e., 9,034 PCEs] is slightly less than 90% of the available capacity in place at this time, a result which suggests the need for providing more highway capacity across the Detroit River is not as urgent as is suggested in Figure S-2 on page ES-2 of the DEIS.

The DEIS should be revised to explicitly state how the peak period PCE statistic was derived from the year 2034 travel demand forecast and the justification for the procedure that was adopted.

10. Sensitivity of Peak Hour Travel Demand to Changes in Assumptions Made in Its Calculation; Peak Period Travel Disincentives; Evaluation of Reversible Lanes

Figure S-2 in the DEIS, prominently shown on page ES-2, indicates that the hourly PCE during 2004 was approximately 3,300. The temporal pattern of vehicular travel is addressed in the TDF on pages 43 through 51 [pdf pp. 52-60]. The TDF on page 51 [pdf p.60], lines 9-11, states that *"the change in travel characteristics between 2000 and 2004 indicates a change in the peak hour from a Summer afternoon weekday to a Fall afternoon weekday, although the differences are not large."* [p 51 [pdf p.60], lines 9-11] PCEs.

Figure S-2 also shows that the hourly "Base Forecast Volume" will be 6,000 PSEs in year 2034.

To: Mr. Robert Parsons, MDOT Public Involvement/Hearing Officer
Re: DRIC DEIS

29 April 2008
Page 11 of 15

However, neither the DEIS nor the TDF contains an analysis of the sensitivity of the hourly PCE for 2034 to changes in assumptions made in the calculations. The DEIS should be amended to address this issue.

As indicated in Section 6 above, it is possible to provide incentives to travel at times other than peak periods. The DEIS also should be amended to address the sensitivity of the peak hour travel forecasts to the implementation of various peak period travel disincentives.

Lastly, it appears from the discussion on TDF pages 43 through 51 [pdf pp.52-60] that between now and 2034 there will be a date beyond which the directional imbalance in traffic flow will be sufficiently large to make feasible the operation of lanes on which the permitted traffic flow is reversible depending usually on the time of day and day of week. For example, if an existing or new highway crossing the Detroit River has four lanes, at some times of day three of the lanes could be used for one direction of travel and the remaining one lane could be used for vehicles traveling in the opposite direction. BWB already has six travel lanes. For BWB normally three lanes are available for each direction of travel. However, during periods of imbalanced peak traffic flow the arrangement could be changed to provide four lanes for the peak flow direction. The DEIS should be amended to define and evaluate this option to avoid providing more capacity than is required.

11. Michigan – Upstate New York Origin-Destination Statistics and Projections

Many Michigan motorists traveling to Upstate New York and New England travel across Canada because the travel time to do that is shorter than to drive into Ohio and then along the south shoreline of Lake Erie. The DEIS includes no information about US traffic using Ontario as a short-cut to avoid driving around Lake Erie. The absence of that data makes it impossible to ascertain whether there is a practical alternative for accommodating such traffic that does not require adding capacity to the international crossings in metro Detroit.

The DEIS requires amendment to clearly present both existing and forecasted travel volumes between Detroit and Upstate New York that uses travel through Ontario as a short cut.

12. US-Canada Travel Origin-Destination Statistics and Projections

The Michigan Department of Transportation, the agency apparently managing the preparation of the DEIS on behalf of the Federal Highway Administration, has not included, either within the DEIS document or in any of the supporting documents, any travel origin-destination data for either "local traffic" or "long distance traffic" between the US and Canada. SEMCOG officials have referred my inquiry for "long distance traffic" data to the Ontario Ministry of Transport. I advised the Michigan Department of Transportation of that referral and was not offered a local source for the data. I then contacted the Ontario Ministry of Transport which in turn advised that the data available at this time are only from a 1999 survey. The Ontario Ministry of Transport also stated that it has statistics as the result of a 2005 survey done in cooperation with US Federal Highway Administration and Transport Canada, but that it cannot yet share the data until a pending data sharing agreement is executed by the parties.

I have requested the 1999 data but have not yet received them. I therefore request from you an opportunity to supplement these comments after I receive and review the 1999 data. I also

To: Mr. Robert Parsons, MDOT Public Involvement/Hearing Officer
Re: DRIC DEIS

29 April 2008
Page 12 of 15

request an opportunity to supplement these comments a second time, after receiving and reviewing the 2005 data.

Given the non-availability of the 2005 data, and given that practical alternatives to the DRIC project can not be evaluated without such data, it is imperative that the DEIS be amended to include the 2005 origin-destination information and then released to the public for additional comment.

13. Intermodal Rail Diversion of Truck Traffic

The TDF on pages 122 and 123 [pdf pp.131-132] addresses the possibility that intermodal rail services could divert a significant amount of truck traffic.

The topic takes up only about 1.2 pages of text and one exhibit.

Perhaps the most notable point included in the discussion is the statement that "***the commercial vehicle traffic...potentially divertible to rail represents approximately 44% of the current total truck volumes on the Ambassador Bridge.***"

The TDF on page 101 [pdf p.110] states that during 2004 a total of 3,370,000 commercial vehicles traveled over AMB. That statistic implies an average truck traffic volume between Detroit and Toronto of over 4,000 per day (both directions combined) or 2,000 per direction per day.

There already are intermodal rail services between southeast Michigan and southern Ontario. Apparently no public funds have been allocated to assist the railroads involved in those services to further develop and to expand the services.

One intermodal service, CP's Expressway, was established approximately in 2000. The TDF on page 122 [pdf p.131] incorrectly states the following about intermodal rail services in general as the result of the termination of that service: "***The potential is also brought into question given the recent cancellation of the CP Xpressway intermodal rail service in 2004.***"

The reason the sentence quoted in the immediately preceding sentence is incorrect is that, according to a Canadian Pacific spokesman on 29 April 2008, the CP Expressway service continues to operate between Montreal and Toronto. The CP merely truncated the western portion of the service. It is not clear whether the truncation of the route was due to a need to reallocate scarce resources to the Montreal-Toronto segment because of great demand there, or if the incremental revenues from operating the service between Toronto and Detroit did not exceed the incremental costs of operating that segment.

Railway Age Magazine's January 2003 issue carried an article about the CP Rail Expressway service, and in that article stated that CP invested \$50,000,000 in equipment to start up the service, which operated between Detroit, Toronto, and Montreal. Given that the DEIS suggests that \$2.5 to \$3.0 billion would be invested to complete a new highway crossing over the Detroit River, it appears inappropriate to deem questionable an intermodal service that requires an

To: Mr. Robert Parsons, MDOT Public Involvement/Hearing Officer
Re: DRIC DEIS

29 April 2008
Page 13 of 15

investment of less than two percent of the investment required for a new Detroit River highway crossing without examining ways to make such a service successful.

A second intermodal service between metropolitan Detroit and Toronto is operated by Triple Crown Service, a subsidiary of Norfolk Southern Railway. That service has been operating for many years, involves one train run per direction on each of five days per week, and for each train run takes approximately 80 to 100 trucks off not only the international highway crossing that otherwise would be used, but also the freeway between the border and Toronto. Air pollution emissions from the locomotive drawing the train reportedly are not more than 25% of the air pollution emissions that would be emitted by the highway tractors that otherwise would operate between Michigan and the terminal in Toronto.

There have been and continue to be other intermodal services between Toronto and Michigan.

In any event, given the statement quoted above that 44% of the truck traffic crossing AMB as of 2004 is potentially divertible to rail, and given the fact that 40 CFR 1502.1 requires that **"...an environmental impact statement...shall provide full and fair discussion of significant environmental impacts and shall inform decisionmakers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment"**, it is imperative that the intermodal rail option be addressed, even though the rail intermodal service alternative is not within the jurisdiction of the lead agency in this case [ref: 40 CFR 1502.14]

14. Public Transportation Options

In Section 6, which is on page 7 of this letter, the magnitudes of weekday "Local traffic" and "Long distance traffic" are presented for automobile and truck traffic on AMB+DWT combined. The data there shows that automobile traffic that is "local traffic" accounted for 38% of the total daily PCEs. Probably "local traffic" accounted for by automobiles during the daily peak travel hour accounts for an even greater percentage of the peak travel hour PCEs accounted for by trucks and autos.

Given the fact that the State of Michigan and the Province of Ontario are considering what is essentially a \$2.5 to \$3.0 billion investment in a new highway crossing of the border, it appears that a reasonable alternative to the highway investment option could be an international public transportation service that would attract the automobile "local traffic" which now impedes the operation of trucks on AMB.

One option is to extend the planned Woodward Avenue light rail line southward to Oullette Avenue in Windsor, and then out Oullette and perhaps out two or three branches from Oullette. Such an extension probably could be done for a cost much less than the estimated cost of the proposed highway bridge structure over the Detroit River. The option therefore is a reasonable alternative and, according to CEQ requirements, needs to be the topic of detailed evaluation in the DEIS.

To: Mr. Robert Parsons, MDOT Public Involvement/Hearing Officer
Re: DRIC DEIS

29 April 2008
Page 14 of 15

The evaluation envisioned would require for both 2004 and 2034 daily and peak-hour origin-destination data for trans-border automobile travel. It also would require the definition of a public transportation service on both sides of the border and the estimation of how much of the automobile travel could be diverted to the public transportation mode.

The DEIS therefore should be amended to do the requisite analysis of the public transportation alternative. If the origin-destination data do not exist, they will have to be developed in order to analyze the alternative.

15. Low-Cost Reasonable Alternatives

There are a number of options that do not involve the expenditure of millions or billions of dollars in order to achieve what President Bush, Prime Minister Harper, and President Calderon described on 21 August 2007 as "...the development of enhanced capacity of the border crossing infrastructure in the Detroit-Windsor region".

15a. Pricing Policies:

Already discussed above are several bridge and tunnel pricing policies that provide incentives to travel either before or after the facilities' peak travel hours and/or to travel in high-occupancy vehicles such as car pools or van pools.

Another pricing policy that could alleviate congestion is, at the time of the next fare increase, is to defer increasing the facility use fee for those who acquire NEXUS identification documents and therefore are eligible for expedited customs and immigration processing on each side of the border.

One of the most unfortunate pricing policies in effect at this time is the policy of selling commuter tickets at reduced prices and not requiring that the reduced-price tickets be used only during off peak hours.

15b. Marketing of the Blue Water Bridge:

A second option is to entice the drivers of trucks and autos to use the BWB instead of AMB or DWT. On page 124 [pdf p.133] of the TDF, in a section entitled "High Diversion to St. Clair River Crossing Scenario", the authors of the TDF state that there is a bias among travelers to use either AMB or DWT instead of the BWB, when all other factors are equal. The authors of the TDF go on to assert that if that bias were removed the need for additional Detroit River crossings would be deferred by six years.

Most likely trans-border travelers between Michigan and London and points east of London are not aware that the total trip length increases by approximately 12 miles when one end of the trip is in Detroit at the entrance to AMB or DWT and the other end of the trip is in London or east of London, and when the travel between the two locations is via BWB instead of via AMB or DWT.

A public education program is appropriate in order to effect a reduction in congestion at AMB and DWT. This can consist of one or more of at least of the following:

To: Mr. Robert Parsons, MDOT Public Involvement/Hearing Officer
Re: DRIC DEIS

29 April 2008
Page 15 of 15

- Distribution (perhaps at Michigan and Ontario travel centers) of BWB brochures which announce the absence of a major travel time disadvantage for cross-border travelers destined to metro Detroit and to London and places east of London
- In Michigan, static signs along northbound I75 at points south of I75 milepost 45 (approximately) and also along eastbound I94, I96, and I69, to announce the advantages of using BWB rather than other crossings.
- In Ontario, static signs located along westbound Highway 401, east of the Highway 402 interchange, to announce the advantages of using BWB to travel to Detroit
- Variable message signs installed in advance of route choice decision points, rest stops, and service centers to announce, for each of the existing border crossings, the estimated time to travel from the sign's location to downtown Detroit and/or other major destinations and whether that time estimate is expected to increase or decrease during the next hour or two. [Having the information before reaching the border could entice travelers to stop and rest or eat before reaching the border if delays at the border will diminish during the rest stop.]

15c Set up reversible lane programs:

If not already done, establish a reversible lane program for BWB and possibly AMB to take advantage of a major imbalance in directional traffic flows. This program could even extend to DWT during the hours immediately before and after major events in downtown Detroit. If necessary, during these occasions use of the DWT could be limited to individuals with NEXUS identification.

16. DEIS Technical Reports

The "Foreword" to the DEIS lists a number of technical reports as being included in the documentary record of the DEIS. Not included in that list is the TDF report which is identified on page 2 of this letter and which is referenced in DEIS Figures S-2 and I-3. The record of working documents that are a part of the DEIS should be amended to include the TDF report.

Respectfully submitted,

[Redacted signature]

[Redacted header]

29 May 2008

Mr. Robert Parsons, Public Involvement/Hearing Officer
Michigan Department of Transportation
PO Box 30050
Lansing, MI 48909 USA
parsonsb@michigan.gov

RE: Detroit River International Crossing (DRIC), Wayne County, Michigan "Draft Environmental Impact Statement and Draft Section 4(f) Evaluation" -- approved by Federal Highway Administration on 15 February 2008

Dear Mr. Parsons:

My letter dated 29 April 2008 consists of comments submitted for the record regarding the Draft Environmental Impact Statement (DEIS) identified above. This letter does not replace my 29 April 2008 letter. Rather, this letter serves as an addendum to my 29 April 2008 letter and the comments that follow therefore also are submitted for the DRIC DEIS record. Accordingly, please append this letter to my 29 April 2008 letter.

1. Abbreviations and their Definitions

The abbreviations used in this letter are identical to those used in my 29 April 2008 letter.

2. Introduction

Please refer to this section in my 29 April 2008 letter.

3. Context of the DEIS

Please refer to this section in my 29 April 2008 letter.

4. The DEIS needs clarification as to what the DRTP proposes to do

The Borealis webpage identified in Section 4 of my 29 April 2008 letter continues to be an active webpage.

In addition, the DRTP webpage providing answers to frequently-asked questions, <http://www.thejobstunnel.com/new/jobs-tunnel.php?nic=faqs>, continues to be an active webpage.

Further, a Crain's Detroit Business article published on 04 June 2007 (at <http://www.crainsdetroit.com/apps/pbcs.dll/article?AID=/20070604/SUB/706010360>) states that DRTP requires approximately \$100,000,000 in US federal assistance to build the tunnel that

To: Mr. Robert Parsons, MDOT Public Involvement/Hearing Officer
Re: DRIC DEIS

29 May 2008
Page 2 of 5

DRTP is proposing. The SEMCOG long range transportation plan line item described in my 29 April 2008 letter states that DRTP will require no local, state, or federal aid.

The inconsistencies between the DRIC DEIS document statement referred to in Section 4 of my 29 April 2008 letter and other published documents continue to require resolution. As noted on 29 April 2008, the inconsistencies can be cured if both of the two co-owners of the DRT submit for inclusion in the DEIS record a written statement clarifying their intentions regarding all of the following: the construction of the proposed high-clearance one-track tunnel, the disposition or alternate use of the existing two tubes comprising the existing DRT. In addition, the statement from DRTP's two partners also needs to make clear DRTP's need for federal assistance.

5. **Rationale for Considering the BWB in the DEIS**

Please refer to this section in my 29 April 2008 letter.

6. **Existing and Projected Traffic on Detroit River Highway Crossings**

As noted in my 29 April 2008 letter, the DEIS should be amended to clarify the traffic forecasting assumptions and to quantitatively evaluate at least the fare policy options identified in Section 6 of my 29 April 2008 letter.

7. **Change in Forecast Base Year from 2004 to 2007 and Revision of Forecast for ~~2034~~2035**

In response to my request, MDOT on 22 May 2008 provided via email the 2005 through 2007 annual traffic counts for AMB and DWT. The report I received is reproduced immediately below.

		ANNUAL TRAFFIC		
		2,005	2,006	2,007
Ambassador Bridge	Passenger Cars	5,865,633	6,113,114	5,649,619
	Trucks	3,445,585	3,498,127	3,398,745
	Buses & Misc.	76,660	68,991	34,071
	TOTAL	9,387,878	9,680,232	9,082,435
Detroit-Windsor Tunnel	Passenger Cars	5,774,705	5,269,959	4,732,981
	Trucks	148,065	127,433	111,082
	Buses & Misc.	59,117	59,772	54,362
	TOTAL	5,981,887	5,457,164	4,898,425

If one combines the ~~BWB~~ annual traffic volume changes since 2004 (reported in my 29 April 2008 letter) with the AMB and DWT traffic volume changes since 2004 shown above, it is readily apparent that the total annual traffic demand on the three crossings combined has declined significantly since 2004 -- by 12% for passenger car traffic, 2% for commercial traffic, and 7% for PCE's (as defined on page 2 of my 29 April 2008 comments and also in the DEIS). Comments on page 8 of my 29 April 2008 submission refer to the DRIC forecasted compound

To: Mr. Robert Parsons, MDOT Public Involvement/Hearing Officer
Re: DRIC DEIS

29 May 2008
Page 3 of 5

annual growth rates (CAGRs) for the total growth in traffic as being 2.9%/annum for automobile traffic and 3.3%/annum for commercial traffic, which means that the 2007 traffic volumes should have been about 10% greater than the 2004 traffic volumes.

It can be concluded that traffic growth forecasts on which the DRIC DEIS relied are not consistent with the reality of traffic flows observed during 2007. Even if the approximate 3% CAGR for traffic volume eventually is realized, the date that the capacity of the existing crossings will be matched by traffic demand perhaps will be in the order of five years later than the years indicated in Figure S-2 on page ES-2 of the DRIC DEIS.

The DEIS should be modified to present the traffic counts for the AMB, DWT, BWB and to amend the forecast for the planning horizon year, ~~2034~~ 2035.

8. **Modification of Forecasts to Reflect Changes in Fuel Prices Since 2004**

I have nothing to add to this section of my 29 April 2008 letter other than to state that fuel prices have continued to increase since 29 April 2008 and that the justification for the conclusions of this section as stated on 29 April 2008 are even more justified now than they were on 29 April 2008.

9. **Evaluation of Peak Period Travel for AMB, DWT, and BWB as a Group during ~~2034~~2035**

I have nothing to add to this section of my 29 April 2008 submission.

10. **Sensitivity of Peak Hour Travel Demand to Changes in Assumptions Made in Its Calculation; Peak Period Travel Disincentives; Evaluation of Reversible Lanes**

I have nothing to add to this section of my 29 April 2008 submission.

11. **Michigan – Upstate New York Origin-Destination Statistics and Projections**

I have nothing to add to this section of my 29 April 2008 submission.

12. **US-Canada Travel Origin-Destination Statistics and Projections**

Although I have received from the Province of Ontario some of the 1999 data referred to in this section of my 29 April 2008 submission, I have not yet had an opportunity to evaluate the data.

The 2005 data continue to be unavailable, apparently due to inaction by the Federal Highway Administration to execute its data sharing agreement with its Canadian counterpart agency.

As indicated in my 29 April 2008 submission, given the non-availability of the 2005 data, and given that practical alternatives to the DRIC project can not be evaluated without such data, it is imperative that the DEIS be amended to include the 2005 origin-destination information and then released to the public for additional comment.

To: Mr. Robert Parsons, MDOT Public Involvement/Hearing Officer
Re: DRIC DEIS

29 May 2008
Page 4 of 5

13. Intermodal Rail Diversion of Truck Traffic

I wish to supplement the comments in this section of my 29 April 2008 letter with the following comments.

As noted in my 29 April 2008 submission, the TDF states that approximately 44% of the current total truck volumes on the AMB are divertible to rail. The total commercial vehicle volume on the AMB during calendar year 2004 was 3,370,000 vehicles [TDF, page 31 (pdf page 40)]. If one divides that figure by 365 and then by 2, and multiplies the result by 44%, it is apparent that more than 2,000 commercial vehicles travel each day in each direction between Detroit and the Greater Toronto Area (GTA).

The TDF forecast for year 2035 is that the total commercial traffic across the border in Detroit will be 8,060,000 [TDF, page 97 (pdf p. 106)]. Interpolating that number to a daily truck traffic volume of travel and assuming that the commercial traffic between Detroit and the GTA is still 44% of the total, it is apparent that the average truck traffic between the two locations will be more than 4,800 per day/direction.

An intermodal train with one 4,000 hp engine can pull a train consisting of 100 semi trailers, especially if it is a train consisting of Roadrailer type highway trailers. Thus the market for rail transport of trailers between Detroit and the GTA at present is approximately one train leaving from each end of the route once every hour, 20 hours per day. As of 2035, that market potential increases to one train leaving each end of the route every 30 minutes.

The typical tractor required to haul one semi-trailer on a highway is equipped with a 400 horsepower engine, which means that 100 trailers towed on a highway require a total propulsion capacity of 40,000 horsepower, instead of 4,000 horsepower if transported by railroad. Theoretically there could be a 90% reduction in the fuel consumed in transporting trailers across southwestern Ontario by railroad instead of having individual tractors hauling them between Detroit and the GTA. The potential may very well exist to reduce emissions from the Detroit-GTA freight vehicles by 90% as well.

Rather than rely on historical narrative, the DEIS should quantitatively assess the potential for intermodal transport of truck trailers between Detroit (and points inland from Detroit) and the GTA.

14. Public Transportation Options

I have nothing to add to this section of my 29 April 2008 submission, other than to point out that, apparently as the result of trade agreements between the US and Canada, the number of "Windsor Census Metropolitan Area" residents working in the USA more than doubled between 1991 and 2001, from 2,545 to 6,975). [TDF, page 26]. If all of these residents travel during one peak hour each weekday morning and vice versa each weekday afternoon and are in autos occupied only by the commuter as the driver, they alone would account for more than two lanes of traffic capacity. Accordingly, public transportation is indeed one part of strategy that constitutes a reasonable alternative to the DRIC project.

To: Mr. Robert Parsons, MDOT Public Involvement/Hearing Officer
Re: DRIC DEIS

29 May 2008
Page 5 of 5

15. Low-Cost Reasonable Alternatives

I have nothing to add to this section of my 29 April 2008 submission.

16. DEIS Technical Reports

I have nothing to add to this section of my 29 April 2008 submission.

Respectfully submitted,

[Redacted signature]