

AMBASSADOR BRIDGE

DETROIT INTERNATIONAL BRIDGE COMPANY

P. O. BOX 32666

Detroit, Michigan 48232

September 9, 2005

Mr. Mohammed S. Alghurabi
DRIC Project Manager
Michigan Department of Transportation
Bureau of Transportation Planning
425. W. Ottawa Street
P.O. Box 30050
Lansing, Michigan 48909

Dear Mohammed,

The Scoping Information document dated July 2005 that was distributed at the DRIC Scoping meeting in Cobo Hall on August 31, 2005 continues to perpetuate a grievous error that we had hoped would be rectified as you re-examined your traffic projections for the Ambassador Bridge.

First, the graph listed as Figure 2 on page 7 of the Scoping document is, in our opinion, wrong on two counts. We do not believe that your projections are justifiable. From comments by many at the Scoping meeting that view seems to be shared widely. But we will address this issue when you release the report that identifies the actual numbers represented on this graph as well as the methodology that produced them.

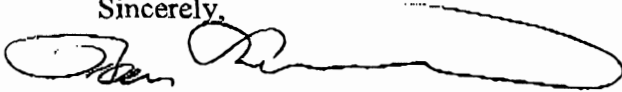
Second, we believe that your representation of the "Crossing Capacity (Traffic Breaks Down)" of the combined Detroit River crossings is grossly inaccurate. In the "Existing and Future Travel Demand – Working Paper" dated January 2004 and prepared by IBI Group for URS Canada it is stated on page 182 that the "peak hour capacity is estimated to be 1,750 PCE/hour/lane for the Ambassador Bridge." This means that the peak hour capacity for the four-lane bridge would be 7,000 PCE/hour/lane.

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Yet Figure 2, claiming to represent both the bridge and the tunnel, indicates a crossing capacity of just 5,000 PCE/hour. At this level you claim that the bridge fails somewhere between 2015 and 2033. Yet even excluding the capacity of the tunnel, a bridge capacity of 7,000 PCE/hour would mean that the crossing capacity of the Ambassador Bridge exceeds even your "high growth" projection of the traffic demand in 2035, the horizon year of your study.

Please provide some explanation for this at your earliest convenience.

Sincerely,



Dan Stamper

cc: Governor Granholm
Gloria Jeff
Dave Wake
Joseph C. Corradino
Carmine Palombo
Bob Parsons

>>> Steven Hoin 09/21/05 10:10 AM >>>

Alex, I obtained a copy of your September 14 letter regarding the DRIC. I am a Project Manager for the RRD and specifically for the BASF Pt. Hennepin site. I am well aware of the environmental and geologic issues associated with this site and offer my assistance if you need it. Also, I would like to make you aware of some significant technical issues associated with the site. As a result of past solution mining activities, the bedrock beneath the site has collapsed into voids formed by the mining. Subsidence continues today in some areas. The subsurface in this area should be considered very unstable and subject to possible collapse, particularly if any additional stresses are placed on the bedrock. Please call me or direct question my way with regard to this issue. The Office of Geological Survey should also be contacted in the event that the site is further considered for the DRIC.

Steven J. Hoin, CPG
MDEQ RRD
Cadillac Place
3058 West Grand Blvd., Suite 2-300
Detroit, MI 48202-6058

(313) 456-4668
hoins@michigan.gov

1 of 2

The Detroit River International Border Crossing Comment Form

The Michigan Department of Transportation (MDOT) is sponsoring this Detroit River International Corridor Study in southeastern Michigan. The Environmental Study Phase of the project involves stakeholders and the public through several rounds of meetings over the period ending in 2007. The purpose of the Detroit River International Corridor Study is 1) to provide safe, efficient and secure movement of people and goods across the Canadian/US border on the Detroit River area to support the economics of Michigan, Ontario, Canada, and the US; and 2) to support the mobility needs of natural and civil defense.

GET INVOLVED!

A series of meetings will be held during this study. If you would like to receive notice of future meetings, and have not already received a mailing, please give us your name and address.

*** PLEASE PRINT CLEARLY *** Your name will be held confidential

Name Victor Abela
 Address 276 W. Grand Blvd.
 City / ZIP Detroit 48216
 Email vabla@lisc.org

How did you learn of this meeting? (Check One) Newspaper Mailer Word of mouth
 Radio Television Other _____
Specify

TELL US WHAT YOU THINK.

We want to know what you think the issues are that affect your area. Is there an issue we should address? Anything you have to say is important. Use the space below and on the back. Or, call 1-800-900-2649.

Leave a message or add your name to the mailing list, if you have not already done so.

Despite being at countless MDOT meetings
over the past few years, I do not recall receiving
any direct contact about this meeting. When will
MDOT take community outreach seriously??

In the purpose statement I saw nothing that
related to maintaining the fabric of the
existing neighborhoods that may be significantly
impacted by a new border crossing, wherever it may
be built.

2 of 2

The Detroit River International Border Crossing Comment Form

Additional Comments:

As stated by attendees, its ~~unbelievable~~ ^{unbelievable} that a health impact study, whether required by law or not, will not be included in the EIS process. It seems like the effects on the wildlife, fish, & water are more important than the effects on the people living around any crossing. This has been an issue with the EIS process around the DIRT & is again with the DIRT EIS nearly complete, it also is mandatory that a new border crossing in general proximity to the DIRT take into account all the environmental effects of the increase in truck & train traffic that could occur there. Additionally, what local benefits would accrue to these neighborhoods must be studied & detailed.

Another concern related to above ones, is of environmental justice & the fact that most alternatives being currently considered are in areas with large percentages of minorities. It also appears unlikely a crossing would be built downriver ^{giving} the cost of a longer span (a minor consideration for me) which would then further concentrate the effects on minority communities.

Public ownership of any future crossing is mandatory - we cannot have ^{another} privately owned crossing.

And also should include a Community Benefits Agreement in the EIS for whatever site might be selected detailing

If possible, please return this before you leave. If not, please mail it to:

Bob Parsons, Public Hearings Officer
Bureau of Transportation Planning
Michigan Department of Transportation
P.O. Box 30050
Lansing, MI 48909
Fax: (517) 373-9255

responsibilities & benefits of both sides.

e-mail us by visiting our Web site at www.partnershipborderstudy.com

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* * * PLEASE PRINT CLEARLY * * * **Your name will be held confidential**

Name George B. Bailey
Address 8106 South Street
City / ZIP Detroit MI 48209-2778
Email gbwbailey@msn.com

How did you learn of this meeting? (Check One) Newspaper Mailer Word of mouth
 Radio Television Other organization
Specify

TELL US WHAT YOU THINK.

Delray Community Council

We want to know what you think the issues are that affect your area. Is there an issue we should address? Anything you have to say is important. Use the space below and on the back. Or, call 1-800-900-2649.

Leave a message or add your name to the mailing list, if you have not already done so.

In light of the current fiscal budget crunches, I find it amazing that public funds are being spent on this project when there already are two VIABLE alternatives which would have the least damaging impact on families and neighborhoods. One is the Jobs Tunnel which is already there, and the most likely is a second span next to the existing Ambassador Bridge. Mr Maroun already owns most of the property and is prepared to spend his own funds to make this happen. Easy connections to I 75 on the US side and to the EC. Row / 401 in Canada, meaning the shortest routes costing the fewest dollars. Perhaps this is too easy of a solution and various organizations need to justify their existence.

George B. Bailey 08/31/2005

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*** PLEASE PRINT CLEARLY *** Your name will be held confidential

Name John Cieluch
Address 21220 Thorokare Rd
City / ZIP Grosse Ile, Mich. 48138-1233
Email _____

How did you learn of this meeting? (Check One) Newspaper Mailer Word of mouth
 Radio Television Other LAST MTG.!

TELL US WHAT YOU THINK.

@ Grosse Ile @ R. Rouge
Specify

We want to know what you think the issues are that affect your area. Is there an issue we should address? Anything you have to say is important. Use the space below and on the back. Or, call 1-800-900-2649.

Leave a message or add your name to the mailing list, if you have not already done so.

YOU KEEP STATING THAT PUBLIC STATEMENTS + COMMENTS ARE IMPORTANT, BUT, HOW MUCH INFLUENCE DOES THE PUBLIC REALLY HAVE? BEEN TO MANY GOVERNMENT STUDY MEETINGS AND IT SEEMS THAT THE MEETINGS ARE ONLY A DOC + PONY SHOW FOR THE PUBLIC. WILL THIS "STUDY" BE ANY DIFFERENT? OR IS MORE OF THE SAME OLD SMOKE + MIRRORS?

WE ALSO SAW PROPOSED CROSSINGS IN THE SLIDE SHOW. WOULD IT BE POSSIBLE TO RECEIVE COPIES, FOR THEY ARE NOT IN THE HAND OUTS THUS FAR. THANK YOU
John Cieluch

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*** PLEASE PRINT CLEARLY *** Your name will be held confidential

Name MARY ANN CUDERMAN

Address 3118 SANDWICH ST.

City / ZIP WINDSOR, ON N9C1A6

Email FAX-519-258-5209

How did you learn of this meeting? (Check One) Newspaper Mailer Word of mouth
 Radio Television Other _____

TELL US WHAT YOU THINK.

*received a call from my Specify
ward councillor 10 minutes before
start of meeting*

We want to know what you think the issues are that affect your area. Is there an issue we should address? Anything you have to say is important. Use the space below and on the back. Or, call 1-800-900-2649.

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*please keep me informed I have
tried to attend every meeting on both
sides of the border. What is ultimately
decided affects all of us - Canadian & American*

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*** PLEASE PRINT CLEARLY *** Your name will be held confidential

Name Claudia DeGrazia
 Address 21301 SALISBURY
 City / ZIP GROSSE ILE, MI 48138
 Email _____

How did you learn of this meeting? (Check One) Newspaper Mailer Word of mouth

Radio Television Other from last meeting
 Specify Dept of Trans.

TELL US WHAT YOU THINK.

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Questioning Travel Demand vs Capacity pg.5 Scoping Info packet
what would forecast the high projections to go up in 2005-2035
when the actual crossings severely declined starting in late 1999
then 9/11 happened and manufacturing severely declined.

Also in the data on pg 5 2004 Daily Traffic
Canada to long distance in US 14% plus long distance to long distance 58%
equals 64% of traffic just passing through where as we
have to absorb all the impact.

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*** PLEASE PRINT CLEARLY *** Your name will be held confidential

Name ROSEANN GABRYS

Address 346 ORANGE ST

City / ZIP WYANDOTE MI 48192-6224

Email _____

How did you learn of this meeting? (Check One) Newspaper Mailer Word of mouth
 Radio Television Other _____

Specify

TELL US WHAT YOU THINK.

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1. SERIOUS ENVIRONMENTAL ISSUES WITH THE
DOWNRIVER CROSSING AREA, SPECIFICALLY THE
THE INTERNATIONAL WILDLIFE REFUGE.
2. THE DOWNRIVER CROSSING ARE IS THE MOST
COSTLY OPTION BECAUSE THE RIVER IS WIDER
AND PLAZAS ARE IN MORE POPULOUS AREAS.
3. THERE IS "NO" SUPPORT FROM THE COMMUNITIES
THAT WILL BE MOST AFFECTED.
4. POPULATION NUMBERS IN THE DOWNRIVER AREA
ARE HIGHEST. MORE INDIVIDUALS WILL BE
AFFECTED

NO BRIDGE DOWNRIVER!

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The Detroit River International Border Crossing Comment Form

Scoping

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*** PLEASE PRINT CLEARLY *** Your name will be held confidential

Name Margaret Garry MexicanTown Community Dev Corp.
 Address 2810 W. Vektor
 City / ZIP Detroit 48216
 Email Margaretgarry@mexicantown.org

How did you learn of this meeting? (Check One) Newspaper Mailer Word of mouth
 Radio Television Other LAC
Specify

TELL US WHAT YOU THINK.

We want to know what you think the issues are that affect your area. Is there an issue we should address? Anything you have to say is important. Use the space below and on the back. Or, call 1-800-900-2649.

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- 1 - Purpose & Need Statement must include the ~~enhancing~~ goal, "Create new economic opportunities and local jobs in the host communities."
- 2 - Purpose & Need Statement must include the goal, "Accomodate increased passenger and rail traffic."
- 3 - Health impact analysis must be completed as part of the EIS.
- 4 - Consistency with local plans must be evaluated using private development plans

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The Detroit River International Border Crossing Comment Form

Additional Comments:

- even if they are not part of any "official planning document"
- 5 - The weighting system for factors used to evaluate illustrative alternatives was flawed in 2 ways 1) Spanish language forms were made available too late in the process and 2) the LAC was relied upon too heavily to distribute & turn in surveys.
 - 6 - Plazas are all too big. Big Plazas do not contribute to safety, efficiency, or community cohesion. Parking trucks is the wrong answer. Processing trucks is the answer.
 - 7 - ~~There~~ A complete cost-benefit analysis for each alternative must be completed. It must include future freeway expansion costs and loss of tax base.
 - 8 - The next border crossing facility must be owned and operated by a publicly controlled entity - regardless of location.
 - 9 - No border crossing facilities should be significantly expanded until the DRIC study is complete.

If possible, please return this before you leave. If not, please mail it to:

Bob Parsons, Public Hearings Officer
Bureau of Transportation Planning
Michigan Department of Transportation
P.O. Box 30050
Lansing, MI 48909
Fax: (517) 373-9255

e-mail us by visiting our Web site at www.partnershipborderstudy.com

*City of Detroit
Bruce M. King*

The Detroit River International Crossing Study Scoping Comments

Air Quality:

1. Burden Analysis: In a previous DEIS- the Burden Analysis was based on National emission source trends to make the impact determination. However, this is flawed. SE Michigan emission source trends differ from the National trend as described in the Michigan Department of Environmental Quality Annual Air Quality Reports. MDOT must make every effort when conducting any analysis to base that analysis on the most current available data.
2. A Burden Analysis treats the emission source as a "point source unit". However, this is not the case with a transportation related project. The emission source in this case is trucks and since they are capable of movement outside the prescribed areas you intend to perform the Burden Analysis, your analysis will not provide a meaningful representation of the air quality impact from this project for the effected community.
3. As indicated in the Scoping Document, SE Michigan is now classified as non-attainment for PM2.5 and the eight-hour ozone standard. MDOT and SEMCOG feel that the USEPA clean diesel engine regulations and Clean Air Interstate Rule (CAIR) will resolve the long term compliance issues SE Michigan has pertaining to the Clean Air Act. However, again this is not the case. SE Michigan still must take additional corrective action to meet the compliance requirements and to interject an additional 6,000,000 tucks and 20,000,000 cars into the area by 2030 will stress our ability to meet the Clean Air Act standards without causing any significant restrictions to our citizens and industries. The DEIS must incorporate real meaningful mitigating measures to reduce the impact this crossing will have on SE Michigan.
4. By suggesting that this crossing be located within a heavily populated urbanized area will not only adversely impact on this regions air quality, but will also adversely impact the health of residents living within the designated areas. There are scientifically approved health risk modeling protocols available that MDOT must undertake to identify all impacted populations and provide for adequate mitigation from those impacts.

BRUCE M. KING
MANAGER II



www.ci.detroit.mi.us

CITY OF DETROIT
DEPT. OF ENVIRONMENTAL AFFAIRS
ADMINISTRATION
660 WOODWARD AVE., SUITE 1800
DETROIT, MICHIGAN 48226
PHONE 313-471-5103
FAX 313-471-5139
KingBM@EnvAfrs.ci.detroit.mi.us

Project Community/Neighborhood Characteristics:

This project will have a significant adverse impact on communities and the neighborhood character as stated on page 37 of the Scoping document. MDOT's solution to this is to acquire those properties and relocated those effected populations. By building the necessary infrastructure to accommodate the movement of trucks and other vehicles, MDOT basically constructs a barrier that separate the neighborhoods. Thus, MDOT must not only work closely with other State agencies, they must work hand-in-hand with community transportation and Planning and Development Departments to insure this project will only impact a limited number of neighborhoods.

Maintain Consistency with Local Planning:

MDOT must use the most current planning information available from each unit of government effected by this project. The location of the crossing at Belle Isle conflicts with the recent and on-going residential developments being construction where the plaza is being purposed.

Protect the Natural Environment:

Because of the sensitive habitats along both the shoreline and within Blue Heron Lagoon, a crossing at this location would be very destructive. The surface water off the bridge will be contaminated with oils and other vehicle related fluids and for this enter the Bell Isle ecosystem is totally unacceptable. MDOT must pay particular attention to any Natural environment studies conduct at this location for final crossing determination. Additionally, MDOT must establish the impact that this project will have relating to air disposition of pollutants into the Detroit River and what long term effects this will have on the Great Lakes

Improve Regional Mobility:

MDOT must work with the Local unit of government's traffic management department staff to address and identify any adverse impact that this project would create with the movement of trucks and cars through urbanized areas prior to entering the highway networks in Detroit.

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*** PLEASE PRINT CLEARLY *** Your name will be held confidential

Name

Patrick Loubriel

Address

8121 South St

City / ZIP

Detroit 48209

Email

loubriel2000@sbcglobal.net

How did you learn of this meeting? (Check One) Newspaper Mailer Word of mouth
 Radio Television Other _____

Specify

TELL US WHAT YOU THINK.

We want to know what you think the issues are that affect your area. Is there an issue we should address? Anything you have to say is important. Use the space below and on the back. Or, call 1-800-900-2649.

Leave a message or add your name to the mailing list, if you have not already done so.

The site known as "C-3 West Delray" should be eliminated from consideration as a potential site. The bridge proposal for this location will destroy a community that is making a come-back. Also, it will prevent and discourage any interest for future commercial investment, as well as residential. The Delray Community Council will be willing to meet with any Agency to discuss, in detail, our concerns for the future of Delray. I will note that the site designated "C-4 East Delray", is mostly vacant: with fewer homes and some businesses. This is not to say that they are less important, but that West Delray can absorb their displacement and enhance an already positive economic and social progress.

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*** PLEASE PRINT CLEARLY *** Your name will be held confidential

Name David Nagy (Delray Community Council)

Address 8127 SOUTH STREET

City/ZIP DET MI 48209

Email DAVE - DENA @ SBC GLOBAL . NET

How did you learn of this meeting? (Check One) Newspaper Mailer Word of mouth
 Radio Television Other _____

Specify

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I LIVE IN THE C3 DELRAY WEST AREA AND I FEEL THAT THIS PROJECT DOES NOT TAKE THE HUMAN ELEMENT INTO CONSIDERATION ON THIS AREA. MDOT WOULD DESTROY OUR ENTIRE NEIGHBORHOOD IN THE C3 AREA WE ARE CURRENTLY EXPERIENCING A GREAT REGROWTH AND REINVESTMENT IN THE C3 DELRAY WEST AREA. I AM OPPOSED TO ANY NEW CROSSING IN THE DELRAY WEST AREA. THIS AREA IS BEING REBUILT FROM THE INSIDE OUT BY ITS RESIDENTS AND COMMUNITY GROUPS WHO WANT TO SEE DELRAY CONTINUE TO EXIST AND GROW AS IT IS DONE NOW BUT WITH HELP FROM GOVERNMENT AND CITY GROUPS THAT WILL HELP DELRAY LIVE AND EXIST AS A NEIGHBORHOOD WITHOUT A NEW BORDER CROSSING DESTROYING OUR HOMES AND COMMUNITY.

DAVID NAGY 2-31-05
DELRAY COMMUNITY COUNCIL

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*** PLEASE PRINT CLEARLY *** Your name will be held confidential

Name Alma Taylor

Address 11742 Miami

City / ZIP Det 48217

Email _____

How did you learn of this meeting? (Check One) Newspaper Mailer Word of mouth
 Radio Television Other Specify

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*** PLEASE PRINT CLEARLY *** Your name will be held confidential

Name Kathy Waudler
 Address 7752 W. Vernor
 City / ZIP Detroit, MI 48209
 Email kathyw@southwestdetroit.com

How did you learn of this meeting? (Check One) Newspaper Mailer Word of mouth
 Radio Television Other email
 Specify

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- Requires absolute public control/oversight
- Requires a community benefits agreement wherever the crossing is located
- Should achieve minimum land acquisition
- Should be designed as a regional landmark
- Should generate local economic development for the community in which it is sited
- Should provide very specific, long term boundaries (100 yrs) so there is no ambiguity for development in the area adjacent to the crossing
- Should provide expedited crossing, w/ latest technology, to be aggressively competitive w/ the current crossings

The Detroit River International Border Crossing Comment Form

Additional Comments:

All environmental impacts must be measured within the context of existing environmental impacts, and not in a vacuum.

You can't rationally move this project ahead w/o a health impact study - no amount of other work can possibly justify this project without it

All federal, state & local permitting processes should be on hold til DRIC study is completed (related to existing crossings)

Before deciding on location the DRIC Partners should look at the percentage of land in use for transportation, as compared to residential and industrial commercial. No community should be unjustly burdened w/ transportation uses.

What other types of freight transportation are part of MDOT's long term transportation planning? How are these other modes being factored into the need for a new border crossing?

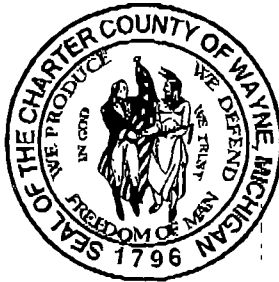
If possible, please return this before you leave. If not, please mail it to:

Bob Parsons, Public Hearings Officer
Bureau of Transportation Planning
Michigan Department of Transportation

P.O. Box 30050
Lansing, MI 48909
Fax: (517) 373-9255

e-mail us by visiting our Web site at www.partnershipborderstudy.com

Kurt L. Heise
Director



Robert A. Ficano
County Executive

September 29, 2005

Mr. Mohammed Alghurabi
Michigan Department of Transportation
Murray D. Van Wagoner Building
P.O. Box 30050
Lansing, MI 48909

**RE: Wayne County Department of Environment Opposition to Detroit
River International Bridge Crossing (DRIC) Proposals**

Dear Mr. Alghurabi:

As Director of the Wayne County Department of Environment, I would like to detail the Department's opposition to the Detroit River International Bridge Crossing (DRIC) proposals as outlined in the draft "Illustrative Alternatives on U.S. Side of Border" document dated August 2005.

By way of background, the Department of Environment is responsible for the operation of the Downriver Wastewater Treatment Facility, maintenance of drains and drain operations under the Michigan Drain Code, and watershed management activities throughout the county. The Department believes that several of its operations in the county will be adversely impacted by the DRIC as currently envisioned, specifically at the following proposed sites:

Plaza S3, S4 – Atofina Chemical Co. East/West

Wayne County operates the Downriver Wastewater Treatment Facility (WWTF) at the northwest corner of Pennsylvania Road and Jefferson. It is the second-largest wastewater treatment facility in Michigan, serving 13 Downriver communities - approximately 250,000 Wayne County residents. This proposed site would effectively landlock the WWTF, preventing any future expansion.

Mr. Mohammed Alghurabi
September 29, 2005
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Such expansion may be required in the future if the EPA mandates so-called "blending" requirements at the plant. In that event, the WWTF will be forced to acquire substantial additional land for stormwater storage at a cost of hundreds of millions of dollars. The traffic associated with a new bridge crossing at the WWTF would also pose substantial vehicular flow, access and security issues. The location of the Atofina chemical plant across from the WWTF only compounds the risk for environmental and/or security hazards for workers and residents in the proposed plaza area.

Plaza S5 – Michigan Steel Works Co.

This site, located in the City of Ecorse, does not appear to have been properly researched. The site is in an area currently occupied in part by the old Michigan Steel Works facility, which is to be razed for residential units. The City of Ecorse has received a Clean Michigan Initiative grant for the remediation of the site. In addition, the City of Lincoln Park's stormwater retention facility is located at the proposed site. Ecorse also has funding to design and install walkways and other greenbelt areas along the Ecorse Creek to the west of the site. Across the site, the City of Lincoln Park maintains the Council Park recreation area, which is located at the confluence of the Ecorse Creek and the Detroit River.

In addition, Wayne County is currently working with the North Branch Ecorse Creek communities on a proposed flood control plan under Chapter 8 of the Michigan Drain Code, which could result in deepening, widening, and channeling of the Ecorse Creek in the area bordering the site to the west and south. An international bridge plaza would severely impact the proper flow of water in the Ecorse Creek, and would seriously impact the County's efforts to provide flood relief for tens of thousands of residents in the cities of Romulus, Westland, Inkster, Taylor, Dearborn Heights, Allen Park, Lincoln Park, Melvindale, and Ecorse.

Plaza C3 – Delray West

This site, bordering the Rouge River, must be coordinated with the existing Rouge Gateway Master Plan and MDOT bridge and road plans which are underway there. An international bridge in this severely undermines the Gateway Master Plan and several greenway projects in the area. Discussion and review with the Southwest Detroit Business Association and Southwest Detroit Environmental Vision is strongly encouraged.

Mr. Mohammed Alghurabi
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Page Three

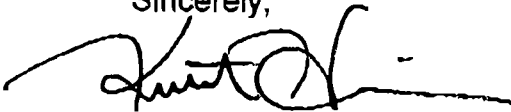
In addition to these specific proposals, the Department of Environment is concerned with the lack of apparent coordination between the DRIC and the watershed management planning efforts currently underway in the Downriver communities, and the existing watershed management plan in the Rouge River Watershed.

We are also troubled by the apparent lack of coordination with the Detroit River International Wildlife Refuge, Friends of the Detroit River, and the Detroit River Remedial Action Plan Advisory Council. The environmental initiatives underway or planned by these entities would be severely impacted by any one of the plans envisioned by the DRIC in the Downriver communities.

This letter is by no means exhaustive of Wayne County's opposition to the DRIC proposals as currently envisioned, with the exception of the "Jobs Tunnel" alternative. Wayne County CEO Robert Ficano's office will be adding further commentary to this letter in subsequent correspondence and public testimony.

Please do not hesitate to contact me if you have any comments or questions.

Sincerely,



Kurt L. Heise, Director
Department of Environment

Cc: CEO Robert A. Ficano
Deputy CEO Azzam Elder
Intergovernmental Relations Director Cindy Dingell
MDOT Director Gloria Jeff
MDEQ Director Steve Chester

Dear Mohammed,

Thank you for your continued interest in receiving Scoping Comments from the community. It is greatly appreciated.

As a member of the LAC, I have previously made the following verbal comments but I would like to state them again for the record in this email.

People's Community Services is concerned on a number of fronts:

a) The Delray neighborhood has been targeted unfairly with the size of the C3 plaza. At 206.31 acres, this is by far largest plaza area. It totally destroys the main area of Delray. In fact, it wipes the neighborhood off the map. No other neighborhood is so targeted.

b) This area still has many historical areas, such as Holy Cross Hungarian Catholic and St. John Cansius Churches, which will be destroyed.

c) Being on the riverfront, the area is ripe for redevelopment. In fact People's Community Services is investing \$1,000,000 for an expanded Neighborhood House and state of the art play ground. If the Delray area was redeveloped it would be a real jewel for the city of Detroit.

e) By targeting this area, MDOT is further destabilizing an area that is in transition. Even the act of making it one of the finalists, may set the area "over the edge."

f) There is a real issue of environmental justice. The residents of Delray have continued to be targeted by every entity which wants to bring something which is environmentally unsafe into the community. They do this because the area is "already polluted" so who cares about "those people." Just because Delray residents are poor and have suffered so much already, is no reason they should be targeted by MDOT for even more environmental pollution such as fumes, noise and traffic from a border crossing.

g) There is also the related issue of home values. It is obviously cheaper to take the homes of poor people in low income neighborhoods. Their homes have less monetary value. But these homes actually have more "human" value than homes in well to do areas. The reason for this, is that if low income home owners are moved out of their homes, they rarely receive enough funds to replace the home they are losing. While the monetary cost is less the human cost is more.

h) It should be noted that the salt mining activity in the C3 area is intense. On a daily basis, the blasting feels like small earthquakes. This strong activity would cause serious safety concerns for a bridge structure or for traffic using the plaza.

i) Plaza C4 would require the reconstruction the I-75 Rouge River Bridge. This would be a monumental task which would tie up traffic for literally months or years.

j) Finally plaza C4 is next to Fort Wayne. If a plaza was placed near to Fort Wayne, it possibly could interfere with an important historical site and a future tourist attraction.

Thank you very much.

Thomas Cervenak
Executive Director
People's Community Services
412 West Grand Blvd.
Detroit, MI 48216
(313) 554-3111
Fax (313) 554-3113
tcervenak@aol.com

Delray Site:
People's Community Services
Delray Neighborhood House
420 Leigh
Detroit, MI 48209
(313) 843-0730

September 15, 2005

Ms. Margaret Barondess, Manager
Michigan Department of Transportation
Environmental Section
Project Planning Division
Murray D. Van Wagoner Building
P.O. Box 30050
Lansing, MI 48909

Dear Ms. Barondess:

**Regarding: Detroit River International Crossing (DRIC)
Scoping Documents**

This is in reply to your letter dated July 29, 2005 transmitting scoping documents for the subject project to us and also based on our attendance at the August 31, 2005 meeting held at Cobo Hall in Detroit regarding the project. The Detroit Water and Sewerage Department (DWSD) has the following comments regarding the subject project.

The scoping documents identify approximately twenty-three (23) alternatives consisting of a border crossing plus a plaza and connecting roadway with eleven (11) of the alternatives located in the City of Detroit.

Because the information provided for the alternatives is very preliminary, DWSD cannot comment in detail on them until further details are provided. However, we are able to make general comments regarding the project.

DWSD has water and sewer facilities located in the City of Detroit as well as throughout the Metropolitan area. Therefore, the alternatives should identify the utilities impacted by them.

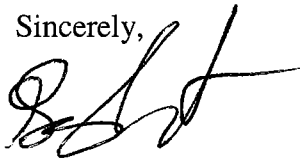
The alternatives should consider the cost/feasibility of relocating or altering DWSD's facilities. All costs to relocate or alter DWSD facilities, including engineering, review, construction and inspection shall be included in the project and at no cost to DWSD. Any relocation or alteration of DWSD facilities is to be done in accordance with plans approved by DWSD and under DWSD's permit and inspection.

It is noted that there are proposed border crossings in the vicinity of Belle Isle and Fighting Island. DWSD has a water intake located at the head end of Belle Isle and also adjacent to Fighting Island. DWSD objects to the construction of a bridge at the Belle Isle location. These intakes have to remain in service at all times. Any alternatives for the Fighting Island vicinity must be evaluated so as not to have any adverse impact on our water intake or present any potential for security breaches during construction or operation of the facility.

After we are provided with specific information regarding the location of the proposed border crossings, plazas and roadways we can provide additional comments regarding the impact on our facilities.

If you have any questions regarding this correspondence, please contact Mr. Bharat Doshi of my staff at (313) 967-1541

Sincerely,



Gary Fujita, P.E.
Deputy Director

cc: Mr. G. White, DWSD
Mr. M. Gill, DWSD
Mr. J. McGrail, DWSD
Mr. B. Doshi, DWSD



United States Department of the Interior

FISH AND WILDLIFE SERVICE
East Lansing Field Office (ES)
2651 Coolidge Road, Suite 101
East Lansing, Michigan 48823-6316

IN REPLY REFER TO:

September 30, 2005

Ms. Margaret Barondess, Manager
Environmental Section
Project Planning Division
Michigan Department of Transportation
P.O. Box 30050
Lansing, Michigan 48909

Re: Detroit River International Crossing (DRIC) Study, Wayne County, Michigan

Dear Ms. Barondess:

We are responding to your letter of July 29, 2005, requesting our comments at this stage of early coordination for the above referenced project. We provide these comments under the authority of the Fish and Wildlife Coordination and the Endangered Species Act of 1973, as amended (Act), and in accordance with the intent of National Environmental Policy Act of 1969, as amended (NEPA).

We understand the Michigan Department of Transportation (MDOT) is preparing a Draft Environmental Impact Statement (DEIS) for a new or expanded Detroit River crossing, plaza and associated roadway connections in the Detroit-Windsor metropolitan areas of Wayne County, Michigan and Ontario, Canada. The July 2005 Scoping Information document that accompanied your letter identifies three broad areas under study for a new crossing: the Downriver Study Area, Central Study Area and Belle Isle Study Area.

The U.S. Fish and Wildlife Service (FWS) is a cooperating agency, as defined in NEPA, with the Federal Highway Administration (FHWA) in the development of an Environmental Impact Statement (EIS) for the DRIC study. We offer the following concerns for consideration and evaluation in the DEIS.

Detroit River International Wildlife Refuge

As shown in the Scoping Information document, the Downriver Study Area crosses the boundaries of the Detroit River International Wildlife Refuge (IWR). We have enclosed a refuge map, which indicates the properties either owned by FWS or under conservation easement as part of the Detroit River IWR. We have considerable concerns that a new crossing, particularly a bridge crossing, may impact lands over which the FWS has jurisdiction by law. The DEIS should evaluate not only the direct effects of usage of refuge lands for bridge piers and other

structures, but also the indirect effects that locating a crossing near the refuge would have on wildlife and the wildlife-dependent public uses (e.g., birding, hunting, fishing, etc.) that the refuge provides.

Migratory Birds

The Detroit River area provides important habitat for migratory birds. *The Atlas of Breeding Birds of Michigan* (1991) identifies 128 species of birds nesting in Wayne County. Habitat for a variety of birds, including waterfowl, shorebirds, waterbirds, and songbirds, occurs within all three study areas as well as on areas managed for wildlife adjacent to the study areas, such as Stoney Island and Calf Island. In addition, the river corridor is a major migration route for waterfowl, hawks and songbirds. In particular, thousands of canvasbacks and redheads are known to occur on the river throughout the fall and winter. Essential habitat for these waterfowl occurs around Grosse Ile (Hennepin Marsh) and Mud Island, both of which occurs within the Downriver Study Area. Common terns (*Sterna hirundo*) also nest at Grosse Ile. The common tern is listed by the State of Michigan as a threatened species. We have concerns that a new crossing would result in loss of habitat for migratory birds, direct mortality from collisions with a bridge crossing, and disruption of movements and behaviors due to increased noise and traffic.

As migratory birds are a federal trust resource, Executive Order 13186 and Director's Order No. 172 direct the FWS to coordinate with other federal agencies to promote the conservation of migratory birds and ensure that environmental analyses of federal actions evaluate the effects on migratory birds, with an emphasis on species of concern. Because the study areas provide nesting, resting and feeding habitat for a variety of migratory birds, including a State listed species, we recommend the DEIS include a full evaluation of potential impacts to migratory birds as well as mitigation measures such as avoiding alteration of important habitat areas, replacing lost habitat, and installing lighting systems on bridge structures to deter collisions.

Fisheries and Aquatic Resources

The lake sturgeon (*Acipenser fulvescens*), an interjurisdictional fishery resource that the FWS identifies as a species of concern, occurs in Detroit River. The lake sturgeon is also listed as a threatened species under Michigan state law. Endemic to the Great Lakes basin, lake sturgeon inhabit large river and lake systems. The lake sturgeon is a bottom-dwelling, warmwater species. Spawning occurs on clean, gravel shoals and stream rapids from April to June; Great Lakes populations are also known to spawn in wave action over rocky areas or ledges along shorelines and islands. Adult sturgeons habitually return to spawn in streams where they were born; after hatching, some young lake sturgeons have been observed to remain in their natal rivers for their first summer of life. The loss of spawning and nursery areas has contributed to the decline of this species.

Lake sturgeons are known to spawn around Zug Island, which is within the Central Study Area. In addition, the U.S. Geological Survey (USGS), in cooperation with other partners including the FWS, have created experimental lake sturgeon spawning habitat in Detroit River near the north end of Belle Isle. As the historic spawning habitat for lake sturgeon in Detroit River is significantly degraded, we have concerns about any additional loss or degradation of habitat. The DEIS should address how a new crossing may affect lake sturgeon spawning habitat and identify ways to avoid impacts.

We also have concerns about consequences to the larger fish community of Detroit River. The DEIS should evaluate the quality of the existing riverine habitat, assess how in-stream structures, such as bridge piers, may alter that habitat, and identify means, such as timing restrictions on in-stream construction, to minimize impacts to fisheries. In addition, we have concerns that a new crossing may release contaminants to the river. Contaminants already in the sediments may be released in the event of construction activities in the channel. Discharge of contaminants, for example oil, grease, metals and road salt, may result from traffic usage of a bridge alternative. The DEIS should assess how these contaminants may impact the aquatic resources of Detroit River and identify measures to mitigate these impacts.

Wetlands

Hennepin Marsh on Grosse Ile provides important habitat for a variety of fish and wildlife resources. We have serious concerns regarding potential impacts to this valuable resource. In addition, wetland habitat occurs on the north end of Belle Isle. Lakeplain prairie also occurs within the Downriver Study Area west of I-75 at Sibley Road and King Road. Lakeplain prairies are of high ecological importance due to their unique floristic character and species richness. Less than one percent of Michigan's historic lakeplain prairie remains today. Because of its plant diversity, landscape position and hydrologic cycle, lakeplain prairie is extremely difficult to recreate and thus is an irreplaceable resource. We recommend avoiding impacts to this rare community type.

Work that would impact wetlands may require a Michigan Department of Environmental Quality and/or U.S. Army Corps of Engineers permit for which this office would have review authority under the Fish and Wildlife Coordination Act. In the review of these permit applications, we may concur (with or without stipulations) or object to permit issuance depending upon whether specific construction practices may impact public trust fish and wildlife resources.

Endangered Species

In accordance with section 7 of the Act, we are notifying you that the northern riffleshell (*Epioblasma torulosa rangiana*), Indiana bat (*Myotis sodalis*) and eastern prairie fringed-orchid (*Platanthera leucophaea*) may occur within the identified study areas. The northern riffleshell and Indiana bat are federally listed as endangered; the eastern prairie fringed-orchid is federally listed as threatened. In addition, the rayed bean (*Villosa fabalis*), a federal candidate species, may also occur in the area.

The northern riffleshell and rayed bean are mussel species that historically occurred in Detroit River. Records for the northern riffleshell exist throughout all three study areas from Belle Isle south to Grosse Ile. The rayed bean is known from the area around Belle Isle. The northern riffleshell habitat consists of swift moving water with a fine or coarse gravel substrate. The rayed bean is found in shoal or riffle areas of streams or wave-washed areas of glacial lakes with a gravel or sand substrate. We recommend a qualified individual conduct surveys to determine the presence of these two species within the study areas. Although the Act does not extend protection to candidate species, we encourage their consideration in planning and development. Avoidance of unnecessary impacts to candidate species will reduce the likelihood that they will require the protection of the Act in the future.

Summering Indiana bats roost in trees in riparian, bottomland, and upland forests (refer to the enclosed attachment). Potential habitat for this species may occur in forested areas along Sibley and King Roads east of I-275. We recommend a qualified individual conduct a habitat survey to determine the suitability of this area for Indiana bats. Based upon the results of this habitat survey, mist net surveys to determine the presence of Indiana bats may be necessary.

The eastern prairie fringed-orchid occurs in the moist soils of lakeplain prairie and is adapted to its seasonal fluctuations of water levels. Our records indicate that the eastern prairie fringed-orchid is known from far southern Wayne County; however, we do not have a record for this species within the DRIC study areas. Individual orchid plants do not flower every year and may become dormant during unsuitable conditions; therefore, its presence in an area may be overlooked. Should the proposed project affect any lakeplain prairie habitat, we recommend a qualified individual conduct a survey to determine presence of this listed species.

Pursuant to section 7(a)(2) of the Act, you must determine whether your actions, including construction of a new river crossing, plazas and connecting roadways and/or upgrade of existing road connections, may affect federally listed species. Section 7(c) of the Act requires federal agencies or their designees to prepare a Biological Assessment (BA) for major construction projects. A major construction project means any major federal action which significantly affects the quality of the human environment, as referred to in NEPA, and requires preparation of an EIS. For your information, we have included Enclosure A, which outlines a federal agency's responsibilities under section 7 and provides guidance for the preparation of a BA and effects determination.

We appreciate the opportunity to provide comments at this early stage of project planning. Please refer any questions to Barbara Hosler of this office at 517/351-6326 or the above address.

Sincerely,



Craig A. Czarnecki
Field Supervisor

cc: FHWA, Lansing, MI (Attn: Jim Kirschensteiner)
FWS, Detroit River IWR, Grosse Ile, MI (Attn: John Hartig)
FWS, Alpena Fisheries Resource Office, Alpena, MI (Attn: Jerry McClain)
FWS, Twin Cities, MN (Attn: Lyn MacLean)
USEPA, Environmental Planning and Evaluation Branch, Chicago, IL (Attn: Sherry Kamke)
USACE, Regulatory Office, Detroit, MI (Attn: Gina Nathan)
USGS, Great Lakes Science Center, Ann Arbor, MI (Attn: Bruce Manny)
MDNR, Wildlife Division, Lansing, MI (Attn: Todd Hogrefe)
MDEQ, Land and Water Management Division, Lansing, MI (Attn: Alex Sanchez)

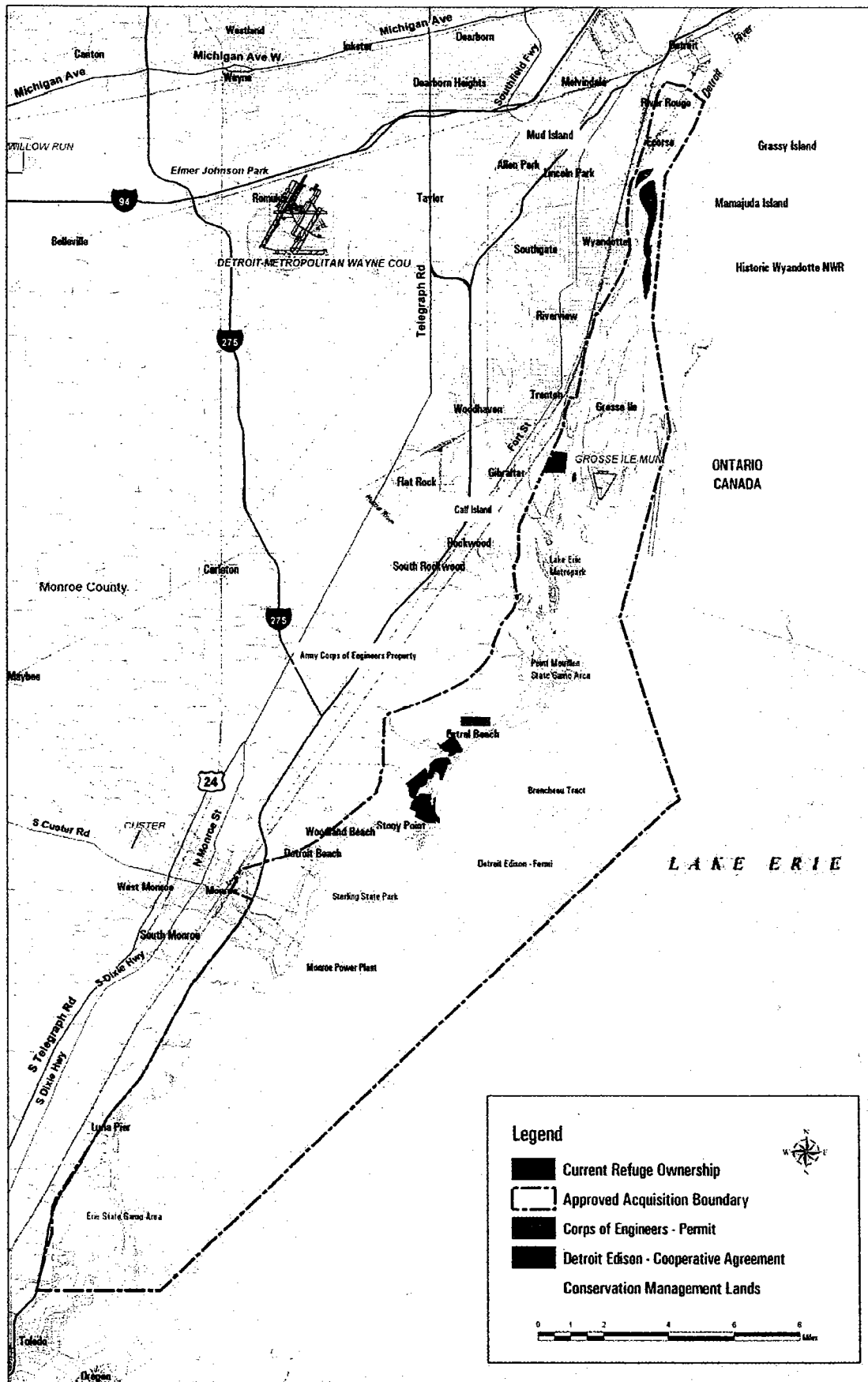


U.S. Fish & Wildlife Service

Detroit River International Wildlife Refuge

Wayne and Monroe Counties, Michigan

Land Status

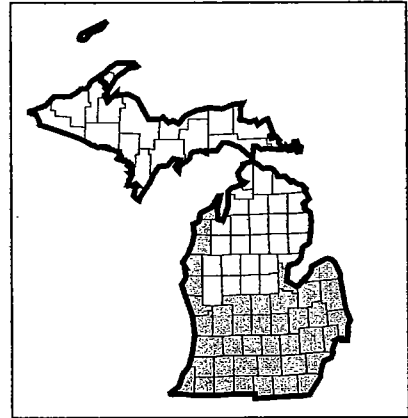


Indiana Bat Life History

Since listing as endangered in 1967, the range-wide Indiana bat population has declined by nearly 60%. Several factors have contributed to its decline including the loss and degradation of suitable hibernacula, human disturbance during hibernation, pesticides, fragmentation of forest habitat, and loss and degradation of forested habitat, particularly stands of large, mature trees.

In Michigan, summering Indiana bats roost in trees in riparian, bottomland, and upland forests from approximately April 15 to September 15. Indiana bats may summer in a wide range of habitats, from highly altered landscapes to intact forests.

Roost trees are typically found in patches of forests of varying size and shape, but have also been found in pastures, hog lots, fence rows, and residential yards.



Indiana bat range in shaded areas.

Male Indiana bats are dispersed throughout the range in the summer, roosting individually or in small groups, but may favor areas near hibernaculum. In contrast, reproductive females form larger groups, referred to as maternity colonies. Female Indiana bats exhibit strong site fidelity to summer roosting and foraging areas, tending to return to the same summer range annually to bear their young. These traditional summer sites are essential to the reproductive success and persistence of local populations.

Indiana bats are known to use a wide variety of tree species for roosting, but structure (i.e., crevices or exfoliating bark) is probably most important in determining if a tree is a suitable roost site. Roost trees generally are dead, dying or live trees (e.g. shagbark hickory and oaks) with peeling or exfoliating bark which allows the bat to roost between the bark and bole of the tree, but Indiana bats will also use narrow cracks, split tree trunks and/or branches as roosting sites. Southern Michigan maternity roost trees are typically in open areas exposed to solar radiation. Roost trees vary considerably in size, but those used by Indiana bat maternity colonies usually are large relative to other trees nearby, typically greater than 9 inches dbh. Male Indiana bats have been observed roosting in trees as small as 3 inches dbh.

Maternity roosts of the Indiana bat can be described as “primary” or “alternate” based upon the proportion of bats in a colony consistently occupying the roost site. Maternity colonies typically use 10–20 different trees each year, but only 1–3 of these are primary roosts used by the majority of bats for some or all of the summer. It is not known how many alternate roosts must be available to assure retention of a colony within a particular area, but large, nearby forest tracts appear important. Although the Indiana bat appears to be adaptable to changes in its roosting habitat, it is essential that a variety of suitable roosting trees exist within a colony's summer area to assure the persistence of the colony.

**FEDERAL AGENCY RESPONSIBILITIES UNDER SECTION 7(a)(2) OF THE
ENDANGERED SPECIES ACT**

Section 7 of the Endangered Species Act of 1973, as amended (Act) directs Federal agencies in their responsibilities to listed species and critical habitat. Section 7(a)(2) of the Act directs all Federal agencies to consult with the FWS to ensure that any action authorized, funded, or carried out by such agency is not likely to jeopardize the continued existence of listed species or critical habitat. This process is referred to as “section 7 consultation.”

Section 7 consultation is typically initiated by a Federal action agency (action agency) by requesting a list of proposed and listed species and critical habitat that may be present in the action area. Based on this list, the action agency must provide the FWS with an analysis and determination of the effects of proposed actions that *may affect* listed species or critical habitat. Actions that are *not likely to adversely affect* listed species and critical habitat require informal section 7 consultation, while actions that are *likely to adversely affect* listed species and critical habitat require formal section 7 consultation. All decisions made under section 7 require the FWS and action agencies to employ the best available scientific and commercial data in their analysis.

The action agency or its designee must assess the potential effects on listed species and critical habitat. The assessment is called a Biological Assessment (BA). By regulation, a BA is prepared for “major construction activities” as defined under the National Environmental Policy Act (NEPA). Although a BA is technically not required for “non-major” construction activities, the action agency must still supply the FWS with an analysis and determination of effects for all Federal actions that *may affect* listed species or critical habitat. The FWS uses the BA, along with any other available information, to decide if concurrence with the determination of effects as made by the action agency is warranted. The BA should be completed within 180 days after initiation of consultation. If work on the BA has not been initiated within 90 days of receipt of the species list, you should verify the accuracy of the species list with the FWS.

To complete the BA, the action agency or its designee should, at a minimum:

1. determine whether suitable habitat exists if the species is likely to be present, which may include an onsite inspection of the area to be affected by the proposal (should be documented in BA);
2. review literature and scientific data to determine species distribution, habitat needs, and other biological requirements;
3. consult experts including those within the FWS, state conservation departments, universities, and others who may have information not yet published in scientific literature;
4. review and analyze the effects of the proposal on the species in terms of individuals and populations present in the action area;
5. analyze alternative actions that may provide conservation measures;
6. make a determination of effects as directed by section 7 of the Act; and
7. prepare a report (the BA) documenting the analysis, including a discussion of study methods used, any problems encountered, and other relevant information.

Note that section 7(d) of the Act states action agencies shall not make any irreversible or irretrievable commitment of resources during the consultation process which would result in violation of the requirements under section 7(a)(2). Planning, design, and administrative actions may be taken; however, no irrevocable actions (e.g., construction) may begin.

We strongly encourage coordination with the FWS early and often in the consultation process. Not only will this save time by minimizing re-drafts of BAs, but we may also have the opportunity to work with the action agency in the development of a project that avoids or eliminates adverse effects before final decisions are made.

Example Outline of a Biological Assessment

- A. Cover letter-** Includes the purpose of the consultation, project title, and consultation number (if available). Indicate the listed species and critical habitat involved and the determination made for each (see below).
- B. Action Area description-** The action area is defined as the extent of the direct and indirect effects of the project. Describe all areas that may be impacted considering that, in some cases, the action area may not be contiguous or may reach beyond the immediate project footprint.
- C. Project description-** Describe the proposed action. Be detailed, specific, and quantify whenever possible. Describe any conservation measures included in the proposed action to minimize effects on listed species.
- D. Species Analyses-**
1. Affected environment (quantify whenever possible)
 2. Species biology (this should constitute a relatively small portion of the document)
 3. Current status of the species in the action area (include the effects of any past or ongoing actions)
 4. Critical habitat (if applicable)
 5. Effects of the proposed action on each species and critical habitat including direct and indirect, and effects of interrelated and interdependent actions.
- E. Cumulative Effects-** Includes the effects of all future state or private activities, not involving Federal activities, which are reasonably certain to occur within the action area (for projects with adverse effects only).
- F. Summary/Conclusion and a Determination of Effects-** (select one for each species/critical habitat):
- i. **No effect-** appropriate when there are absolutely no effects of the project, positive or negative, on listed resources. “No effect” does not include small effects or effects that are unlikely to occur. If effects are beneficial, insignificant (in size), or discountable (extremely unlikely), a “may affect, not likely to adversely affect” determination is appropriate (see below). A “no effect” determination does not require written concurrence from the FWS; however, the action agency should document and support the determination.
 - ii. **May affect-**
 - a. **Not likely to adversely affect-** appropriate when all effects are beneficial, insignificant, or discountable. Beneficial effects have contemporaneous positive effects without any adverse effects to the species or habitat. *Insignificant effects* are small in size, and should not reach the scale where take occurs. *Discountable effects* are extremely unlikely to occur. Based on best judgment, a person would not: 1) be able to meaningfully measure, detect, or evaluate insignificant effects or 2) expect discountable effects to occur. This determination requires informal written concurrence from the FWS.
 - b. **Likely to adversely affect-** appropriate when adverse effects cannot be avoided. A combination of beneficial and adverse effects is still “likely to adversely affect,” even if the net effect is neutral or positive. Adverse effects do not qualify as discountable simply because they are not certain to occur. The probability of occurrence must be extremely small to achieve discountability. Likewise, adverse effects do not meet the definition of insignificant because they are less than major. If an adverse effect can be detected in any way or if it can be meaningfully articulated in a discussion of the results, then it is not insignificant. This determination requires a request for formal consultation with the FWS.
- G. References**
- H. List of Contacts Made**
- I. Maps/Photographs/Figures**

September 30, 2005

DRIC Study, Bureau of Transportation Planning
P.O. Box 30050
Lansing, Michigan 48909

Re: Comments for the Detroit River International Crossing Scoping Document

As Detroit City Council President, I have strong concerns about the evaluation of alternatives for a new border crossing in the region.

The border crossing alternatives, proposed in the DRIC study, in Detroit and those with freeway connections in Detroit would have harmful implications for Detroit neighborhoods, commercial districts, and the health and safety of Detroiters. The alternatives would in some cases destroy neighborhoods, decimate commercial districts, and increase the environmental and economic burden transportation has on Detroit residents. City of Detroit divisions and departments will detail the impacts to specific areas of Detroit affected by this project.

All potential sites for a border crossing and freeway connection must be studied to determine their impacts on the surrounding residential communities, local businesses, neighborhood economy, air quality, environmental justice, safety, local planning, cultural and environmental assets, and noise. In the event that a border crossing is developed, mitigation of these impacts is a must, and methods of mitigation must be specified. In addition, tangible benefits as desired by the local community must be provided if a new border crossing development moves forward.

Any new border crossing where the crossing must be built anew should be publicly owned. This would provide increased oversight of safety measures, impacts on local communities, and compliance with local, state, and federal laws and regulations. There should be open discussion and debate regarding the ownership and governance of the proposed crossing. Permitting by local, state, and federal agencies for any new border crossing should be delayed until the impacts of such a development are studied and the DRIC study has been completed.

Residential communities already suffering from the impacts of a border crossing should not have their burden increased by the creation or expansion of another border crossing. Sites for plaza locations and freeway connections should minimize the impact to

commercial and residential areas. Vehicles leaving a border crossing should connect directly to the freeway system and not use neighborhood streets.

The burden of a border crossing should be shared equally by the respective sides of the border. It is unfair to burden only the U.S. side with the responsibilities for customs processing and toll booths.

Alternatives beyond the creation of a new border crossing for vehicles should be evaluated in this project. Alternative forms of moving freight across the border, which would eliminate traffic congestion on the freeways, should be evaluated.

As always, active community participation and input must be included throughout the DRIC study. I am concerned that the Evaluation surveys used to weight evaluation factors were not distributed in Spanish until late in the collection of these surveys making it difficult for several affected residents of Detroit to participate in this process. I am also concerned that those who participated in the weighting of evaluation factors were self-selected potentially skewing the results of the survey.

This letter represents my initial comments on the scoping document. I anticipate that there will be additional concerns and comments as the scoping period progresses.

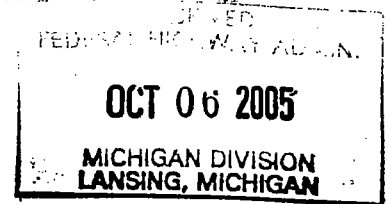
Sincerely,

Maryann Mahaffey, A.C.S.W.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 29 2005



REPLY TO THE ATTENTION OF:
B-19J

Mr. James Kirschensteiner
Assistant Division Administrator
Federal Highway Administration – Michigan Division
315 West Allegan Street, Room 201
Lansing, Michigan 48933

RE: Comments on the July 2005 Scoping Information for the Detroit River International Crossing (DRIC) Draft Environmental Impact Statement (DEIS), Wayne County, Michigan, U.S.A and Ontario, Canada

Dear Mr. Kirschensteiner:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, and in anticipation of reviewing the Draft Environmental Impact Statement (DEIS) for the Detroit River International Crossing (DRIC) project, we have reviewed the Scoping Information document dated July 2005. I also attended the August 31, 2005 scoping meeting in Detroit where I made some of the comments listed below.

The scoping information states that the purpose of the Detroit River International Crossing Project is to (for the foreseeable future i.e., at least 30 years): 1) provide safe, efficient and secure movement of people and goods across the Canadian-U.S. border in the Detroit River area to support the economies of Michigan, Ontario, Canada and the U.S., and 2) support the mobility needs of national and civil defense to protect the homeland. The information also states that to address future mobility requirements across the Canada-U.S. border, there is a need to do the following:

- Provide new border crossing capacity to meet increased long-term demand;
- Improve system connectivity to enhance the seamless flow of people and goods;
- Improve operations and processing capability; and
- Provide reasonable and secure crossing options in the event of incidents, maintenance, congestion or other disruptions.

We recognize the critical importance of having adequate, safe and efficient border capacity for movement of people and goods. This clearly is essential to the economies of both countries involved as well as the Detroit and Windsor areas. The U.S. Environmental Protection Agency (EPA) previously provided concurrence on the purpose and need for the project. Additionally, we have agreed to be a cooperating agency and signed the environmental streamlining agreement for this project because of our desire to participate proactively in the project evaluation process.

At this point, we are aware of about 17 possible locations for one or more new international crossings, as presented by the project study team. The crossing locations are categorized by location as either in the Downriver study area, Central Area, or Belle Isle Area. The scoping document shows that each illustrative alternative will include not just a river crossing location but also a plaza location along with connecting roadway linkages to the freeway networks on each side of the border. Both tunnels and bridges are being evaluated. We believe this approach is comprehensive. More information regarding how the illustrative alternatives were developed, including the siting of plaza locations, should be included in the DEIS.

We understand that the process for evaluating illustrative alternatives is taking place now. The scoping information provides a short description of the process to be used for evaluating the illustrative alternatives. However, detailed information regarding how this was done was not included in the scoping information and thus far EPA and other resource agencies have not participated in evaluating these illustrative alternatives. This is important information that EPA and other resource agencies will want to see as part of their review of the alternatives analysis done for this project. We recommend that the Federal Highway Administration (FHWA) and Michigan Department of Transportation (MDOT) provide EPA and other resource agencies the opportunity to provide comments on this step of the process.

Of particular interest to us is the information for air quality that is being used as an evaluation factor in the analysis of illustrative alternatives. The scoping information indicates that pollutant burdens will be calculated for carbon monoxide, carbon dioxide, hydrocarbons, oxides of nitrogen, particulates of 10 microns (PM10) and 2.5 microns, (PM2.5), air toxics (benzene, 1,3-butadiene, formaldehyde, acetaldehyde, and acrolein), and diesel particulate matter. Hot spot analyses would be conducted for carbon monoxide. Although we are encouraged that these pollutants are being evaluated in the analysis, it isn't clear how the results will be used to screen illustrative alternatives. For projects where truck activity is high and/or idling of diesel engines will occur, localized impacts of diesel emissions and PM2.5 should be addressed. We continue to encourage FHWA and MDOT to address the concern regarding localized pollution by analyzing PM2.5 (especially diesel PM), using dispersion analysis. This will allow concentrations of pollutants to be calculated and will provide information regarding localized hotspots, which then could be addressed by design modifications or other mitigation measures.

As this project progresses and planning becomes more refined and specific, we would appreciate the opportunity to work with FHWA on providing additional, more specific guidance as it relates to this project. We believe many environmental concerns can be addressed by comprehensive analysis. Specifically, we would like to work with FHWA, MDOT and Michigan Department of Environmental Quality (MDEQ) on air quality analysis. We note that the border crossing partnership in which FHWA and MDOT are members has a webpage that references an Attachment 2. This attachment refers to air quality analyses that were done with the Detroit Intermodal Freight Terminal (DIFT) project. We agree that this is a useful place to begin technical discussions regarding what analyses are appropriate; however, specific discussions regarding this project are warranted. We suggest that discussions begin soon on air quality

analysis issues so that they can be finalized during the 4th Quarter of 2005, as described in the Interagency Streamlining Agreement. We view this analysis area as a key component of the overall environmental study work. Initial discussions regarding what analyses are sufficient should be followed up with written protocols for concurrence by EPA, Michigan DEQ, and other relevant agencies.

In addition to the general comments that we have provided above, we have provided some initial comments on specific environmental issues that concern EPA that should be addressed in the DEIS.

Air

Metropolitan Detroit is currently designated as a “non-attainment area” for ozone and fine particulates, and a “maintenance area” for carbon monoxide. There are particularly high monitored readings of fine particulates in the Southwest Detroit, lower Rouge Valley monitors. MDEQ will be very challenged to develop a state implementation plan to achieve fine particulate standards by 2010 given the existing air quality and sources in the area.

Conformity Demonstrations

The transportation and general conformity requirements apply to nonattainment and maintenance areas. New traffic facilities need to be taken into account in transportation conformity. Other Federal actions must be assessed for general conformity. The environmental planning for this project should address these requirements

Air Toxics

Citizens have raised concerns regarding air pollution from the set of pollutants known as air toxics (defined as 188 hazardous air pollutants in the Clean Air Act as well as EPA’s published list of 21 mobile air toxics), and in particular, cumulative health impacts to their communities from multiple point, area, and mobile sources. We have recently expressed concerns regarding local impacts of air toxics and diesel particulate emissions from the DIFT project. Although the DIFT project is instructive, the Detroit River International Crossing project has its own unique features and should be evaluated as a distinct project. We recommend that FHWA and EPA have focused discussions in the near future to discuss how to address air toxics, including diesel particulates in the Border Crossing project analysis.

Water

Impacts to Wetlands - We understand that the many of the corridors would involve impacting established wetland complexes. Depending on the alternatives considered, these impacts may be extensive. In order to determine, under Section 404 of the Clean Water Act, that the least damaging practicable alternative is selected for implementation, we will need a clear description of the amount, type, function, and quality of wetlands in the vicinity of each alternative. Additionally, we would expect that FHWA would document efforts to avoid and minimize

wetland losses, and include conceptual plans for how FHWA plans to mitigate for unavoidable losses to wetland impacts in the DEIS.

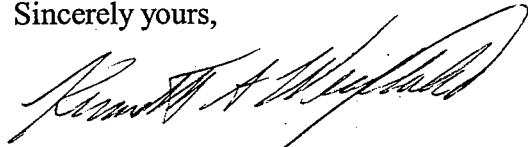
Contaminated Sediments -

We are aware that several of the proposed alternatives, if eventually selected for project implementation, would encounter contaminated sediments. FHWA and MDOT should work with MDEQ and EPA on this issue as the alternatives evaluation proceeds.

Thank you for the opportunity to provide these scoping comments to you. We consider this a very significant project for our Region. As such, we are prepared to work with you as at the project progresses in order to ensure that environmental impacts are minimized and that appropriate alternatives are considered.

If you have any questions on our comments, please contact Sherry Kamke. Ms. Kamke can be reached by phone at (312) 353-5794 and by e-mail at: kamke.sherry@epa.gov.

Sincerely yours,



Kenneth A. Westlake, Chief
NEPA Implementation Section



STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



JENNIFER M. GRANHOLM
GOVERNOR

STEVEN E. CHESTER
DIRECTOR

October 10, 2005

Ms. Margaret Barondess, Manager
Environmental Section
Project Planning Division
Michigan Department of Transportation
P.O. Box 30050
Lansing, Michigan 48909

Dear Ms. Barondess:

Thank you for the opportunity to submit comments on the July 2005 Scoping Information document for the Detroit River International Crossing (DRIC) study, Draft Environmental Impact Statement (DEIS). The Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD), has significant concerns for the existing air quality in the study area and for the potential impacts that the proposed project may have. The following comments are additional to the verbal comments provided by Mr. Robert Sills of the AQD at the August 31, 2005 DRIC scoping meeting in Detroit. Also, it is apparent that the intended scope of the DEIS for the DRIC project will be very similar to the DEIS for the Detroit Intermodal Freight Terminal (DIFT). Therefore, the MDEQ's August 16, 2005, comments to Michigan Department of Transportation on the DEIS for the DIFT project also generally apply to the proposed DRIC project with regard to the limited assessment of air quality impacts.

The Scoping Information document describes the evaluation factors briefly in section 5.3.1. The assessment scope for the maintenance of air quality is very briefly described in that section and in Table 8. Our comments are based on that information, and on the assumption that the further details of the approach to evaluating air quality impacts will be very consistent with that of the DIFT DEIS.

The AQD is concerned about the potential for localized ambient air impacts of particulate matter of 2.5 microns or smaller (PM_{2.5}) and air toxics, including diesel emissions and other compounds. The AQD requests the quantification of emissions and the modeling of local ambient concentrations of PM_{2.5}, diesel particulate matter (DPM) and other air toxics. The purpose of such assessments would be to identify possible local areas of concern, to help compare the relative impacts of the alternative proposals, to compare the relative concerns for the air toxics, and to evaluate the effectiveness of potential mitigation measures. We are disappointed that the scoping document indicates that the modeling of ambient air impacts for PM_{2.5} and air toxics will not be performed for the DEIS. Lacking that assessment, these important issues and comparisons cannot be adequately evaluated. The absence of modeled ambient air impacts is a major deficiency of the proposed DEIS. Due to this void in the assessment, the DEIS may not support conclusions regarding the potential for adverse environmental and human health impacts and environmental justice concerns.

On January 5, 2005, the U.S. Environmental Protection Agency (EPA) designated the seven-county Detroit Metropolitan Area as nonattainment for the PM_{2.5} National Ambient Air Quality Standards (NAAQS). This designation became effective on April 5, 2005. The State of Michigan is required to develop a plan to address the PM_{2.5} NAAQS by April 5, 2008. The state's plan will need to incorporate any expected additional activity in the nonattainment area. The state may need to consider significant local emission reduction programs targeting diesel emissions in order to reach attainment for the PM_{2.5} NAAQS. An overall concern is with regard to potential increases in PM_{2.5} emissions associated with the project alternatives. Due to the elevated PM_{2.5} monitoring values existing in the area today, a local assessment of PM_{2.5} ambient concentrations from increased river crossing operations should be performed.

We note that section 5.3.1 of the Scoping Information document states that an air toxics "burden" (emission) analysis will be presented for DPM and five other air toxics. Without dispersion modeling and risk assessment, it is not possible to effectively utilize this information for desirable evaluations, as noted above. All six of these air toxics have been identified as compounds of concern in the Detroit area, based on the MDEQ's Detroit Air Toxics Initiative (DATI) risk assessment.

The air toxics of focus in the DEIS have been relatively well studied toxicologically, with established and peer-reviewed health risk benchmark information that is widely used in the EPA and MDEQ regulatory programs. It would be desirable to include a fair and transparent discussion of this issue in the DEIS. The EPA's most recent National Scale Air Toxics Assessment, the DATI, and the Detroit Exposure and Aerosol Research Study, indicate that air toxics pose significant health concerns in the Detroit area. These risk assessment findings should be acknowledged and accounted for in the evaluation of major projects such as the environmental impact statement (EIS) for the DRIC project. If that accounting leads to a rationale to not utilize air toxics exposure and risk assessments in the EIS, that approach would still be preferable to the simple dismissal of the notion as presented in the DEIS for the DIFT project.

An ambient air impact analysis may entail the application of some reasonable assumptions, as with virtually all environmental risk assessments, and should be accompanied by proper qualifying statements. Yet it should be emphasized that such assessments are valuable and very informative – not for pass/fail decision-making, but for providing a basis for comparison of the DRIC alternatives, identifying the relative concerns for specific air toxics and impacted areas, and helping to inform appropriate decisions on mitigation efforts. The available health information is widely accepted, peer-reviewed, and utilized in risk assessments, along with available models and methods that are routinely employed in regulatory contexts.

It is our position that emission and dispersion models and methods are widely accepted and used in regulatory contexts and are appropriate for these analyses. There are well-established cancer and/or noncancer risk assessment factors for all of the air toxics to be included in the DEIS. Ambient air impact and risk assessment should be done for all of the emission estimates for each of the alternative approaches. The DEIS should provide an adequate understanding of the impacts of the proposed project alternatives on the air quality of the local neighborhoods.

We are very concerned that the DEIS may be inadequate in proposing and discussing mitigation measures for air quality. Mitigation measures will be critical for the project because of the PM2.5 nonattainment problem in Southeast Michigan. The DRIC proposals may reasonably be expected to result in increased PM2.5 emissions. Emission controls may be appropriate to reduce these emission increases as part of the state's strategy to attain the PM2.5 standard in the required time frame. The DEIS should contain a quantitative analysis of the mitigation strategies for the alternatives and a firm commitment to implement specific mitigation measures. The current language in the Scoping Information document provides no assurance that the emission increases from the DRIC will be adequately addressed.

Thank you for this opportunity to comment on this very important matter. If you have any questions regarding our comments, please contact Ms. Barbara Rosenbaum, AQD, at 517-335-4609, or you may contact me.

Sincerely,



G. Vinson Hellwig, Chief
Air Quality Division
517-373-7069

cc: Mr. Steven E. Chester, Director, MDEQ
Mr. Jim Sygo, Deputy Director, MDEQ
Ms. Barbara Rosenbaum, MDEQ
Mr. Robert Sills, MDEQ
Mr. Robert Irvine, MDEQ
Mr. Robert Rusch, MDEQ

THE JOBS TUNNEL™
DETROIT RIVER TUNNEL PARTNERSHIP

September 28, 2005

Mohammed S. Alghurabi, Senior Project Manager
Michigan Department of Transportation
Bureau of Transportation Planning
425 W. Ottawa Street
P.O. Box 30050
Lansing, MI 48909

Dear Mohammed:

After reviewing the Detroit River International Crossing Study's Draft Environmental Statement/Scoping Document dated July 2005, the Detroit River Tunnel Partnership (DRTP) is pleased to submit the following comments. The DRTP asks that these comments be considered and that they be incorporated into this Scoping Document. You, your MDOT team, and your consultants are to be congratulated for the data and engineering focus of the report.

Regarding the document, some of the new ideas are excellent and have not been so clearly stated in other documents. These important ideas in the Scoping Document include: the reference to "solutions" in the second sentence, confirming that the recommendation from the Study may include more than one crossing; the need for governmental or public oversight of the next crossing (something the DRTP strongly agrees with); the emphasis on Homeland Security as a driving force; inclusion of the Canadian Senate Committee report quote about redundancy as key to the selection of the next crossing; and the emphasis on the need to look at existing and future crossings as a system.

The DRTP applauds the emphasis in several places on the pressing economic need for increased border-crossing capacity, and the table on page eight which suggests that the unstable nature of some elements of the current system could be reached in as soon as five years.

In addition, the DRTP believes you will not find any "fatal flaws" in The Jobs Tunnel project, or within The Jobs Tunnel transportation corridor should you explore your own crossing alternative that might use this corridor. You will be pleasantly surprised with the cost-effectiveness of our project and corridor because the Detroit River Tunnel Partnership already owns most of the land required in this corridor.

The comments to the Scoping Document have been organized by document section with page number(s). Two types of comments are respectfully presented: 1) areas that need clarification and 2) areas that need further analysis. These comments follow in the chart on the next page.

In addition, please find comments on the purpose and need statements contained in the Scoping Document. These comments provide an analysis on how The Jobs Tunnel and The Jobs Tunnel transportation corridor fulfill these purposes and needs.

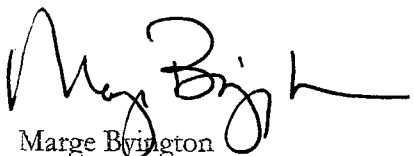
Comments on the DRICS Scoping Document		
Section/Page	Areas for clarification	Areas for additional analysis
Section 2.0, page 3	In the first sentence, there is a reference to the foreseeable future being 30 years. Please clarify the start date. Thirty years from 2000? 2005?	No comment
Section 2.1, page 3	The first bullet refers to a river crossing. For consistency with the first page of the document, shouldn't it be crossings?	No comment
Section 3.0, page 6	<ul style="list-style-type: none"> a. The reference to "at least 30 years" is here again. b. In the first bullet in the needs list, the reference to "long-term demand" needs to be clarified. Can you supply numbers to this statement? c. The last bullet in that same list refers to "reasonable and secure crossing options." Are you talking about redundancy here and if so, why not use the word? See comment on section 3.2. 	No comment
Section 3.1, pages 7 and 8	<ul style="list-style-type: none"> a. The top of page 7 refers to the "breakdown" of capacity at this border. This section should talk about the point at which this border crossing <u>could</u> become unstable. That may be as early as 2010. This is five years ahead of the "breakdown" and could make life very difficult for users and neighbors of the current crossings. b. On page 8 in the second bulleted point, the first word should be "Lost" not "Increased." 	No comment

Comments on the DRICS Scoping Document		
Section/Page	Areas for Clarification	Areas for additional analysis
Section 3.2, page 9	This section should cite redundancy as an important security criterion for selection of the next crossing	No comment
Section 5.2.1, page 22	There is no illustration of a soft ground bored tunnel. Such a cross-sectional drawing should be included. If you need a good cross-sectional drawing of such a tunnel, the DRTP can provide one.	No comment
Table 8, page 39	Overall this is a good chart. However, it is a little confusing with too many inside jargon/technical terms being used. The language in the chart should be a little easier to understand for the lay person.	This chart does not seem to address speed of construction. How fast could the lands be acquired and the project completed? This needs to be addressed in this chart as part of the selection criteria.

This should help with your Scoping Document and your evaluation process. If you would like to discuss any of the items mentioned in this letter, let's meet at your convenience.

Again, congratulations on an outstanding draft document.

Sincerely,



Marge Byington
 Detroit River Tunnel Partnership

Enc.

cc: Mr. Dave Wake, Windsor Projects Coordinator, Ministry of Transportation, Environmental Unit, Mr. James J. Steele, Administrative Director, Michigan Federal Highway Administration, and Ms. Gloria Jeff, Director, Michigan Department of Transportation

Detroit River International Crossing Study

Scoping Document

The Jobs Tunnel Corridor Correlation with Project Purpose and Need

This document highlights the reasons why The Jobs Tunnel and its transportation corridor should be considered as viable alternatives for the next phase of the Detroit River International Crossing Study.

The Scoping Document for the Detroit River International Crossing Study (DRIC) lists two project purposes and four project needs. They are listed below:

Project Purpose

- 1. Provide safe, efficient and secure movement of people and goods across the Canadian-U.S. border in the Detroit River area to support the economies of Michigan, Ontario, Canada and the U.S.**
- 2. Support the mobility needs of national and civil defense to protect the homeland.**

Project Need

- 1. Provide new border-crossing capacity to meet increased long-term demand;**
- 2. Improve system connectivity to enhance the seamless flow of people and goods;**
- 3. Improve operations and processing capability; and,**
- 4. Provide reasonable and secure crossing options in the event of incidents, maintenance, congestion, or other disruptions.**

Overview

The Jobs Tunnel and its direct corridor have many advantages. The Jobs Tunnel corridor has existing transportation infrastructure that can be reused, the twin tube rail tunnel, a direct transportation corridor connecting the 401 in Windsor, ON and I-75/I-96 in Detroit, Michigan, as well as 207 acres for related transportation infrastructure. Other infrastructure can be constructed in a creative and flexible manner that will meet all the DRIC purpose and need statements listed in the Scoping Document. The Jobs Tunnel project, with its existing flexible transportation corridor, can be broadened to meet a variety of infrastructure elements. Because it's already an active transportation corridor, it lets transportation planners design a variety of optimum crossings that meet current and future transportation needs of this region.

Each of the two project purposes and four project needs is presented below with a brief description of how The Jobs Tunnel project and its transportation corridor fit the purpose or need.

Project Purpose:

- 1. Provide safe, efficient and secure movement of people and goods across the Canadian-U.S. border in the Detroit River area to support the economies of Michigan, Ontario, Canada and the U.S.**

The Jobs Tunnel project and its flexible transportation corridor will provide a redundant crossing with additional traffic lanes at the Detroit-Windsor border crossing. These new traffic lanes within The Jobs Tunnel corridor will be designed to provide for the free flow of commercial trucks, trains and other vehicles, thus bringing economic stability to the region. With the free-flow of commercial trucks come reliable just-in-time deliveries that are demanded by so many automotive plants in this region.

The Jobs Tunnel transportation corridor offers a direct link between Highway 401 and Interstate 75 with indirect access to I-75 right now. As stated in the DRIC *Illustrative Alternatives on U.S. Side of the Border* document dated August 2005, on the U.S. side, trucks will also have "access to I-75/I-96 via the existing rail line right-of-way in conjunction with the Gateway Plaza design" currently under construction. This alignment maximizes the value of public funds committed in the Gateway Plaza project. A study by Transportation and Economics Management System, Inc. (TEMS), a leading transportation consulting firm with extensive Windsor and worldwide experience, stated in August 2004 that The Jobs Tunnel will eliminate 75 million hours of truck delays and save consumer and industry over \$3 billion in fuel and time savings over the next 30 years.

On the Canadian side, four at-grade railroad crossings will be eliminated with grade separations to provide more safety along the corridor as well as easing traffic movement in the City of Windsor.

- 2. Support the mobility needs of national and civil defense to protect the homeland.**

The Jobs Tunnel project and its flexible transportation corridor will provide a redundant crossing for Detroit and Windsor. By constructing this redundant crossing safely away from the existing bridge and tunnel crossings, homeland security will be improved.

The pairing of The Jobs Tunnel transportation corridor and the existing Ambassador Bridge provides optimal protection against a terrorist threat. Aside from the redundancy provided, with its possible multiple tunnels, The Jobs Tunnel transportation corridor presents a completely different method of crossing the border.

In addition, this corridor offers a unique opportunity to create a state-of-the-art security system on both sides of the border that meets the needs of homeland security. Homeland security will be enhanced through a security scheme that is designed from the ground up, using the latest high-tech equipment.

Project Need:

1. Provide new border-crossing capacity to meet increased long-term demand.

Currently, commercial traffic is causing most of the congestion at the border. The Jobs Tunnel effectively doubles the capacity of the border crossing, with the addition of one more truck lane in each direction (along with appropriately-sized support services, such as U.S. and Canadian Customs plazas). This will eliminate the congestion. In addition, the construction of a high-clearance rail tunnel facilitates the diversion of commercial goods from truck to rail, further easing pressure at this border and provides much needed new, high-tech rail services between Ontario and Michigan.

From a design perspective, The Jobs Tunnel corridor can accommodate more than two lanes. If further border capacity is deemed necessary, DRIC should feel comfortable in being creative in using the flexibility and the assets that The Jobs Tunnel transportation corridor provides.

2. Improve system connectivity to enhance the seamless flow of people and goods.

The Jobs Tunnel transportation corridor offers a direct link between Highway 401 and Interstate 75 with indirect access to I-75 right now. As stated in the DRIC *Illustrative Alternatives on U.S. Side of the Border* document dated August 2005, on the U.S. side, trucks will also have “access to I-75/I-96 via the existing rail line right-of-way in conjunction with the Gateway Plaza design” currently under construction. This alignment maximizes the value of public funds committed in the Gateway Plaza project. Transportation and Economics Management System, Inc. (TEMS), a leading transportation consulting firm with extensive Windsor and worldwide experience, stated in an August 2004 study that 75 million hours of truck delays will be eliminated by The Jobs Tunnel project.

Direct, non-circuitous highway connections with seamless supporting operations will yield a reduction in transportation costs, time and fuel consumption. The Jobs Tunnel transportation corridor meets this challenge well. In addition, the combination of a tunnel system and the Ambassador Bridge in the same vicinity enhances reliability from two perspectives. First, daily reliability is assured by reduced congestion. Second, long-term reliability is assured with redundant, complementary facilities. Maintenance opportunities and security enhancement assure the continued flow of goods. A secondary benefit is the increased confidence private industry will have to locate or keep facilities in a reliable, congestion-free transportation environment.

The Jobs Tunnel and its corridor are self-contained. They do not use any local roads.

In addition, truck traffic would enter the corridor from Highway 401 or I-75 directly, bypassing any local roads such as Fort Street, Talbot Road, Huron Church Road, Wyandotte Street and EC Row.

Project Need: (continued)

3. Improve operations and processing capability.

The vision for The Jobs Tunnel transportation corridor includes: electronic tolling and an ITS system interconnecting all of the Detroit-Windsor crossings, which include the Ambassador Bridge, the Detroit-Windsor Vehicular Tunnel, the Blue Water Bridge and the ferry crossings. With this system, incident management for each facility can be interconnected. Drivers can be alerted of delays and can choose to use another crossing before waiting in a queue. With regard to congestion, see response to primary objective one.

The Jobs Tunnel will have an incident management strategy that meets or exceeds all regulatory requirements. Emergency response vehicles will be on either side of the portal. Using proven techniques, operators will be able to access and address any incident quickly.

4. Provide reasonable and secure crossing options in the event of incidents, maintenance, congestion, or other disruptions.

The Jobs Tunnel transportation corridor meets this challenge well. The combination of a tunnel system and the Ambassador Bridge in the same vicinity enhances reliability from two perspectives. First, daily reliability is assured by reduced congestion. Second, long-term reliability is assured with redundant, complementary facilities. Maintenance opportunities and security enhancement assure the continued flow of goods. A secondary benefit is the increased confidence private industry will have to locate facilities in a reliable, congestion-free transportation environment.

Additional Benefits of the Corridor

Any construction within The Jobs Tunnel transportation corridor will meet or exceed all applicable governmental standards. Tunneling will begin well back from the river's edge on both sides of the border thus keep the riverfront open for development. In addition, tunneling will not disturb the river bottom making these operations environmentally sound.

In addition to the positive environmental benefits, additional mitigation efforts such as berming and greening are expected to minimize any potential impacts while maximizing quality of life. The Jobs Tunnel and its corridor do not touch or disturb any Areas of Natural and Scientific Interest or any other environmentally-protected land.

Summary

In summary, The Jobs Tunnel and its transportation corridor meet all of the Purpose and Need statements as listed in the Scoping Document of the DIRC Study. The Jobs Tunnel and its corridor have the flexibility to meet rail, truck and other transportation needs. It reuses existing infrastructure and is a cost-effective, efficient border-crossing solution.



2411 Fourteenth Street • Suite 200 • Detroit, MI 48216
313.965.5853 voice • 313.965.9822 fax

03 October 2005

Mr. Mohammed Alghurabi
Senior Project Manager
DRIC Study, Bureau of Transportation Planning,
P.O. Box 30050
Lansing, MI 48909

Dear Mr. Alghurabi:

Thank you for this opportunity to provide comments regarding the scoping of the Detroit River International Crossing Environmental Impact Statement (DRIC EIS). I have chosen to focus my comments on both the over-arching purpose and need of the Border Partnership Study as well as specific comments related to the affect that the any of the four I-I Plazas would have on the Greater Corktown community.

Purpose and Need Issues:

Rail & Transit: While MDOT is touting the need for the expansion of Livernois Yard in the Detroit Intermodal Freight Terminal study due to a projected increase in rail transport of freight and goods, the DRIC study gives no consideration to how this increase would affect the DRIC study's projected numbers that would seem to justify the need for a new border crossing. Additionally, no consideration has been given to cross-border transit or pedestrian/bicycle facilities.

Economic Development: The Purpose and Need Statement should specifically call for enhancement of the local economy of the host community. To this point, all concern for economic development in the DRIC EIS has been on a regional level, ignoring the burden that the host community would bear.

Private vs. Public Ownership: As one of the purported goals of the DRIC is to promote cross-border security, it would seem prudent to promote public ownership and operation of any new border crossing. A privately-owned crossing exerts undue influence on not only homeland security, but international commerce as well.

Other Requirements for EIS Process:

All state and federal agencies participating in the DRIC study should agree to a moratorium on issuing all new permits related to new or expanded border crossings along the Detroit River until the DRIC study is complete.

The DRIC study should include an alternative that encompasses improvements to existing border crossings (such as plaza improvements or freeway improvements), but does not necessarily include the construction of a new span.

In addition, should an additional border crossing be pursued for construction anywhere along the Detroit River, the Environmental Impact Statement must include a Community Benefits Agreement (CBA) between members of the host community and the project sponsors to help achieve some positive benefits for any host community impacted by this project.

Plaza Analysis:

Overall, I have found the analysis of the land surrounding the four Interstate Plazas (II 1-4) to be very incomplete. The photos and the written descriptions that accompany the plaza maps have completely ignored the context of the Corktown neighborhood that borders each plaza site. Corktown is Detroit's oldest neighborhood and has been touted in numerous media outlets and by every level of government as a model of urban redevelopment in Detroit. New and restored houses, major loft development, and new businesses are regular occurrences in Corktown, and the neighborhood was designated as a 2005 "Cool City Neighborhood" by the State of Michigan in recognition of the holistic neighborhood revitalization that is occurring. Additionally, there is absolutely no reference to the Detroit Riverfront Conservancy's Vision for the West Riverfront, which was recently awarded \$29 million in Federal funds due to Senator Levin's efforts.

I would be happy to tour MDOT and its consultants around Corktown to present the restored houses, new infill housing, the Workers Rowhouse Experience project, Corktown-Mexicantown Greenlink routes, Michigan Avenue commercial investments and infrastructure improvements, as well as the schools, churches, and other institutions that are making a difference in this community. To ignore such massive investment in a Detroit neighborhood is unacceptable.

I would hope that these comments as well as updated plaza analyses be incorporated into the DRIC study.

Sincerely,

Kelli B. Kavanaugh
Deputy Director



JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
THE KEWEENAW BAY INDIAN COMMUNITY

GLORIA J. JEFF
DIRECTOR

HAS NO INTEREST IN:

PROJECT # 2005 Detroit River (EIS)

SUMMER COHEN
SUMMER COHEN/THPO/NAGPRA

8-29-05
DATE

Susan LaFernerier
Keweenaw Bay Indian Community
107 Beartown Road
Baraga, Michigan 49908

Dear : Ms. LaFernerier

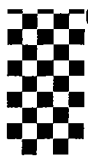
The enclosed scoping document provides project background, describes the illustrative alternatives under consideration, and summarizes the issues and public involvement activities to date on the Detroit River International Crossing (DRIC) Study. As part of the early coordination and scoping process, the project team is seeking input from interested agencies as well as the general public. We are asking for comments on this project as it relates to specific areas of concern, acceptable methodologies for impact assessment, and mitigation/permitting requirements which may be necessary for project implementation.

The Michigan Department of Transportation (MDOT) has started preparing a Draft Environmental Impact Statement (DEIS) for a new or expanded Detroit River crossing, plaza, and associated roadway connections in the Detroit-Windsor metropolitan areas of Wayne County, Michigan and Ontario, Canada. The DRIC study is a bi-national effort to identify solutions that support the regional, state, provincial, and national economies while addressing civil and national defense and homeland security needs of the busiest trade corridor between Canada and the United States.

The Border Transportation Partnership provides high-level sponsorship for this study and includes the Federal Highway Administration (FHWA), MDOT, the Ontario Ministry of Transportation, and Transport Canada. The Partnership conducted a Feasibility Study in 2003-2004 (material available at www.partnershipborderstudy.com), which provided the foundation for the current study.

FHWA has identified the following federal cooperating agencies, including:

- U. S. Army Corps of Engineers
- U. S. Department of Homeland Security (Customs and Border Protection)
- U. S. Coast Guard
- U.S. Fish and Wildlife Service
- U.S. General Services Administration
- U. S. Department of State
- U.S. Environmental Protection Agency



Transmittal Sheet

TO: Mr. Mohammed Alghurabi, MDOT, DRIC Project Manager

FROM: Mrs. Dolores Leonard, Sierra Club

Date: September 30, 2005

Pages: 5 including transmittal sheet

SUBJECT: Detroit River International Crossing - Personal Comments

Refer: DRIC

Mr. Alghurabi, my personal comments are forwarded in response to the request at the Cobo Hall Scoping Meeting.

SUBJECT: EJ AND ILLUSTRATIVE ALTERNATIVES

DATE: September 30, 2005

TO: Michigan Department of Transportation, Bureau of Transportation Planning

FROM: Mrs. Dolores Leonard, Fort and Schaefer, Zipcode 48217

While I am a member of the Environment Justice Committee, Sierra Club and the Original Citizens of Southwest Detroit, the following comments are submitted from me as a citizen of the city of Detroit. My community would be greatly impacted by the selection of either C2 and C3 Illustrative Alternatives.

I thank the Department of Transportation for the opportunity to view both sides of the Detroit River from the vantage point of the riverboat tour that took place Wednesday, September 28, 2005.

All along the way, I noted the Canadian side of the river had more greenery whereas the American side had much more industrial sites and wondered if this meant the American side is not as conscious about the environment as the Canadians or did it mean citizens on the American side of the river were settled sooner and therefore had greater opportunity and more time to build industrial sites than their Canadian counterparts?

During the boat tour, I spoke with persons from Canada and those who live in communities other than Detroit. All persons seemed to be focused on a basic theme - the quality of life should a disruption of their communities take place. A person living in Canada expressed the concern of the truck noise and air pollution experienced in the community around the Ambassador Bridge. That person lives two blocks from the Ambassador Bridge. Persons from Southgate expressed what they viewed as an illogical choice coming from the river through Pennsylvania Road to connect to I75. They just built their home. Several persons expressed their views that the bottleneck at the Ambassador Bridge comes from the Customs Area on both sides of the Ambassador Bridge. At what point did the bottleneck occur? It was suggested at the point the trucks were routed differently at Clark Street.

When the first public presentations of an international crossing was introduced, it was a matter of the possibility of a bridge or a tunnel; the possibility that a bridge or tunnel may or may not be necessary. Now I do not hear bridge or tunnel nor it may or may not take place. Now I hear a bridge will be built and it is just a matter of where. Because of so many negative experiences with bureaucracy in the past, my position is that a decision has already been made as to where a bridge will be erected.

In my community of Fort and Schaefer, I am concerned about the amount of industry that already exists -- a major oil refinery, Marathon Oil; the Detroit Salt Mines bombing for salt daily beneath our homes; Ford Motor Company; the city of Detroit Waste Water Treatment Plant and U. S. Steel (Great Lakes Steel). In the city of River Rouge, there are oil storage/gas storage tanks leading towards Belanger Park; Also in that area, there is a large Detroit Edison complex. There are companies that no longer operate in the community but their existence still has a lingering impact - Fabricon on Pleasant Street, Detroit; Whitehead and Kales, River Rouge.

Whereas C1 is located in the city of Ecorse, C2 in the city of River Rouge and C3 in Delray, all three proposed sites would have a profound impact upon the 48217 zipcode community of 10,515 people. U.S. Census data for zipcode 48217 indicate there are 2,057 persons 65 years and over living in the area. The median family income (1999) is \$33,970 which is well above the poverty level. Additionally, there are 2,990 disabled persons living in the area. Seventy percent of the homes are owner occupied; 30 percent are renter occupied properties. There are 4,303 total housing units in the 48217 zipcode.

Other 48217 zipcode community characteristics - two schools - Boynton and Mark Twain; one community center - Kemeny; one playground - Piwok located at Annabelle and Visger; one senior citizen high rise on Annabelle street which is located four blocks from Schaefer; approximately 20 churches; approximately 25+ businesses; the historical Fort Street Bridge to be renovated in 2006 by MDOT is close to the proposed C2 alternative.

Also, it should be noted in the 48218 zipcode on Coolidge (Schaefer), the newly built River Rouge High School stands. There are at least four elementary schools in River Rouge that would be impacted by air pollution.

There is a June 2003 fact sheet published by EPA regarding air pollution and children. The data discusses the health impact of diesel exhaust near schoolyards as they idle (www.epa.gov/cleanschoolbus). Logic suggests proportionately school busses to trucks there will be a heavy health impact upon any community from diesel exhaust fumes wherever a bridge is built.

While I am aware that communities grow through commerce, I am equally concerned that communities stay whole and intact. There are many citizens living in my community who were displaced as a result of the I94 expressway that came through a solid African American community in the city of Detroit. The expressway was not built for the convenience of the community but for commerce; built so that people who do not live in Detroit would have access to the city and back to their own intact communities. The I75 expressway is

another example of communities being split and dismantled. All in the name of progress.

One of the evaluation factors to be used in the evaluation process focuses on **protecting the community/neighborhood characteristics**. Table 1 of the Proposed Evaluation Factors and Performance Measures, Illustrative Alternatives Phase presents the seven factors to be considered. Evaluation factor, Protect Community/Neighborhood Characteristics is further delineated by performance measure categories. Environmental justice is one of those categories. The performance measure to be used is the census tracts for those communities. Using hard data should not be the sole source in measuring this category. There is a human element. The seniors who live in this community have raised their families here. Their roots are here. Their homes may only have a median value of \$46,300 but their homes are mortgage free. Free and clear is how many describe their property. They have concerns about the value of their property the same as any other community.

In reviewing the data from the U.S. Evaluation Factor Weighting and the Factor Weighting Rationale - Canadian Version, there is a decided difference in the values of the Americans and the Canadians. The American public rankings (875 respondents) were - #1 Protect Community/Neighborhood Characteristics; #2 - Maintain Air Quality; #3 - Protect Cultural Resources. The Canadian public rankings (45 respondents) were - #1 Changes to Air Quality; #2 - Protection of Natural Environment; #3 - Protection of Community & Neighbourhood Characteristics.

A question was asked during one LAC meeting - what happens when the Americans and Canadians do not agree on the factors? The response was that there would be a decision made based upon consensus. Americans want to protect their community and neighborhood characteristics. Canadians want changes to air quality. This consensus process will be very interesting.

Also in the implementation and process of the factor evaluations, the Canadian project team, public and the CCG completed the process. For the Americans, only the public and the MDOT technical team completed the factor evaluations. The American LAC did not complete the evaluation.

The Sierra Club's definition of environmental justice is - the fair treatment and equal protection under Federal environmental laws to ensure that all people, regardless of race, culture or income level, live in clean, safe and sustainable communities. Further, environmental justice is a human right. It is a civil rights issue. Environmental justice focuses on communities in crises caused by the larger society but fostered on communities such as mine -communities of color and low income. Can the Michigan Department of Transportation look at my community objectively? Will the Environmental Protection Agency and other governmental agencies implement impartially the mandated federal laws and

Presidential Executive Order 12898? Will they ensure that low income communities and communities of color be protected fairly? This country has a history that has not been kind to these classifications of people. Will this Detroit River International Bridge Crossing be the same business as usual?

This week in Washington there was much discussion regarding the Public Health and Environmental Equity Act. The public may/may not be aware that EPA has tried to rewrite the protection for the least of its citizenry. Again, whom do we trust to look out for our communities and treat all fairly and equitably?



JENNIFER M. GRANHOLM
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



STEVEN E. CHESTER
DIRECTOR

September 14, 2005

Ms. Margaret Barondess, Manager
Environmental Section
Project Planning Division
Michigan Department of Transportation
P.O. Box 30050
Lansing, Michigan 48909

Dear Ms. Barondess:

**SUBJECT: Scoping Document- Detroit River International Crossing Study
Wayne County, Michigan, Ontario, Canada**

Thank you for the opportunity to review the July 2005, scoping document for the Detroit River International Crossing (DRIC) Study that we received on August 1, 2005. The purpose of the study is to consider transportation alternatives that will improve the border crossing facilities, operations, and connections to meet existing and future mobility needs between Canada and Michigan (for the foreseeable future, i.e., at least 30 years). The stated purpose of the DRIC project is to:

- Provide safe, efficient and secure movement of people and goods across the Canadian-U.S. border in the Detroit River area to support the economies of Michigan, Ontario, Canada and the U.S.
- Support the mobility needs of national and civil defense to protect the homeland.

In order to meet these goals the DRIC study indicates that there is a need to:

- Provide new border crossing capacity to meet increased long-term demand.
- Improve system connectivity to enhance the seamless flow of people and goods.
- Improve operations and processing capability.
- Provide reasonable and secure crossing options in the event of incidents, maintenance, congestion, or other disruptions.

The DRIC study identifies three broad areas where a new crossing could be located. These three areas are identified as:

- Downriver Study Area- includes all or parts of the communities of Wyandotte, Riverview, Southgate, Trenton, Grosse Ile, Romulus, and Brownstown Township. Approximately 10 alternatives will initially be evaluated within this area.

- Central Study Area- includes Lincoln Park, Ecorse, River Rouge and part of Detroit. Approximately 10 alternatives will initially be evaluated within this area.
- Belle Isle Study Area- includes the City of Detroit. Approximately 2 alternatives will be evaluated within this area.

As part of the alternative evaluation, plaza locations will also have to be identified in both Michigan and Canada to tie into any proposed crossing.

We have the following comments concerning the scoping study and the information provided at the August 31, 2005, resource meeting that was held at Cobo Hall.

- 1) The following permits or statutory considerations will be required from the Michigan Department of Environmental Quality (MDEQ).
 - a) A National Pollution Discharge Elimination System (NPDES) for storm water discharges associated with construction activities in accordance with Rule 2190 promulgated in accordance with Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA).
 - b) Part 91, Soil Erosion and Sedimentation Control, of the NREPA. Part 91 permits are generally issued by the county or in some instances a municipality. Two exceptions to the above are: 1) if the earth change involves two or more Part 91 permitting entities, the MDEQ issues the Part 91 permit; and 2) if the project is undertaken by the Michigan Department of Transportation (MDOT), the MDOT may undertake the project without obtaining a Part 91 permit if it follows MDEQ approved procedures that are consistent with Part 91 requirements.
 - c) Part 301, Inland Lakes and Streams, of the NREPA.
 - d) The Floodplain Regulatory Authority found in Part 31, Water Resources Protection, of the NREPA.
 - e) Part 303, Wetlands Protection, of the NREPA.
 - f) A permit under Part 625, Mineral Wells, of the NREPA may be required if the project requires the re-plugging of an abandoned solution mining well.
 - g) In addition, Land and Water Management Division staff review projects for consistency with Michigan's Coastal Management Program (MCMP), as required by Section 307 of the Coastal Zone Management Act, PL 92-583, as amended (CZMA). The proposed bridge crossing project is within Michigan's coastal zone management boundary, and as such is subject to consistency requirements. A determination of consistency with the MCMP requires evaluation of a project to determine if it will have an adverse impact on coastal land or water uses or coastal resources. Projects are evaluated using the permitting criteria contained in the regulatory statutes administered by the MDEQ. These statutes constitute the enforceable policies of the Coastal Management Program. Provided no valid objections based on valid

environmental concerns are received during the public notice period and all required permits are issued and complied with, and no adverse impacts to coastal resources are anticipated. Upon issuance of all necessary permits, this project will be consistent with MCMP.

- 2) The MDEQ is concerned about the high air pollution levels in the Southeast Michigan area, within which all proposed crossing areas are located. In addition, MDEQ has an obligation under the federal Clean Air Act to bring the Southeast Michigan area into attainment with the National Ambient Air Quality Standards (NAAQS) for fine particulate matter (known as PM-2.5) and ozone. The proposed crossing locations are within designated non-attainment areas for these pollutants and changes in air pollutant emissions associated with increased traffic, different crossing locations, and other impacts of Detroit River crossings are important factors in our analysis of necessary measures to attain the PM-2.5 and ozone NAAQS. Please keep the MDEQ Air Quality Division abreast on the status of the DRIC project and provide information concerning air quality analysis and mitigation of air quality impacts as the project proceeds.
- 3) The MDEQ's Remediation and Redevelopment Division and Waste and Hazardous Materials Division Warren office should be contacted for information on contaminated and hazardous sites.
- 4) There are potential environmental concerns with each of the three selected corridors which will require a thorough evaluation.

- a) Downriver Study Area- The northern tip of Grosse Ile, known as Pt. Hennepin, is owned by the BASF Corporation. This area is contaminated due to waste disposal and has very poor soil conditions with a high PH. BASF has objected in the past to any proposed pier construction on Pt. Hennepin. There are abandoned brine wells off shore that must be considered and has potentially contaminated river sediments. High quality coastal wetlands exist near and along Pt. Hennepin and a high quality Walleye fishery exists along this entire area of the Detroit River.

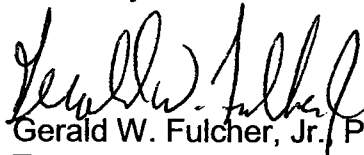
Some of the inland areas associated with these proposed alternatives have significant areas of wetland including Lakeplain Prairie (LLP) areas. Some of the most important LLP areas are found in the vicinity of Telegraph Road on the north and south side of King Road and also on Sibley Road west of Telegraph Road.

- b) Central Study Area- This area also contains walleye fishing, contaminated sediment and Sturgeon spawning which is a threatened species.
- c) Belle Isle Area- Belle Isle has some of the last remaining bottomland forested wetland along the Detroit River. This is a high quality wetland which contains the state threatened species, Pumpkin Ash. The state threatened Eastern Fox snake is also found on the island. Several species of federally threatened and endangered mussel species may be present in this area. A significant Walleye fishery can also be found in this area.

- 5) Section 3.1 the second paragraph says 95% of the person trips are road based as shown in Table 2. It is not clear in Table 2 how the 95% is derived.
- 6) Section 5.3, the third paragraph indicates that earlier studies indicated that road based solutions outside of the Detroit River area do not meet the project's purpose and need as they did not divert enough traffic from the Detroit River area. This study should be referenced in the Draft Environmental Impact Statement and be made available upon request.

We may have additional comments as the study proceeds and more information becomes available as to the potential environmental impacts. If you have any questions please contact Mr. Alex Sanchez at 517-335-3473 or you may contact me.

Sincerely,



Gerald W. Fulcher, Jr., P.E., Chief
Transportation and Flood Hazard Unit
Land and Water Management Division
517-335-3172

cc: Mr. John Konik, USACE
Ms. Sherry Kamke, USEPA
Mr. Craig Czarnecki, USFWS
Mr. Abdel Abdella, USFHA
Ms. Mary Vanderlaan, MDEQ
Ms. Teresa Seidel, MDEQ
Mr. Ben Okwumabue, MDEQ
Mr. Oladipo Oyinsan, MDEQ
Ms. Barb Rosenbaum, MDEQ
Mr. Chris Antieau, MDEQ
Mr. Alex Sanchez, MDEQ



Mohammed Alghurabi, P.E.
517-373-9255

**DRIC Scoping Comments
DRAFT 8/17/05**

Comments related to the Purpose and Need Statement

- The Purpose and Need Statement should have explicit language that a new border crossing should enhance the economy of the host community. A new goal "Create new economic opportunities and local jobs in the host communities" should be added under "Project Goals and Objectives."
- In addition, consideration of the economic development potential of local tourism should be considered as a goal in the Purpose and Need Statement, particularly with the well-documented decline of manufacturing. Much of the justification for the purpose of the project is the manufacturing potential of the Detroit-Windsor area. While manufacturing plays an important currently, it is well know that manufacturing has been declining in Michigan. How valid are the models used by the Border Partnership Study to project future manufacturing potential?
- The models used to forecast future truck traffic also seem to be based on flawed assumptions. With manufacturing declining and major decreases in truck traffic due to the events of 9/11, it seems unrealistic that the high growth projections will occur in the timeframe projected. And with the low-growth projections indicating that demand will not exceed capacity current border infrastructure until 2030, it seems reasonable that advancements in border processing or transportation technology will help alleviate capacity issues by then.
- Given that almost 80% of the passenger traffic between the US and Canada is local, the Purpose and Need Statement should include language related to the exploration of cross-border mass transit as a way to accommodate increases in future passenger traffic. In addition, given that 80% of the truck traffic is traveling long distance, the Purpose and Need Statement should include language related to the exploration of rail as a way to move freight cross border. In general, the statement is narrowly focused on continuing existing modes of transportation, which may not be the most environmentally or economically beneficial in the future. It does not make sense that rail or mass transit options cannot meet the purpose and need, particularly with the right level of investment and given the possible intermodal investment at the Livernois-Junction Yard in Southwest Detroit.
- All aspects of "security" needs should be covered in the Purpose and Need Statement, not just physical security. A privately-owned border crossing has undue influence in commerce and trade between the US and Canada. Changes in tolls or other private decisions can be as crippling to manufacturing as a terrorist attack. There is a public interest in exploring other governance structures.



Comments related to the factors being used to evaluate the illustrative alternatives:

- Important*
- An analysis of regional burden may not give adequate consideration to the air quality impacts of the host community. The analysis of the local air quality impacts should include an analysis of health impacts. The air toxics being studied are known cancer-causing agents or are known to have non-cancer health impacts beyond health protective levels. Some analysis of health impacts must be undertaken. This is particularly true given the importance being placed on protecting the natural environment. The health of humans is just as important as the health of wildlife and plant life.
 - How is community cohesion being evaluated? Will cumulative impact of previous projects which bisected the community be considered? How will the community be consulted in determining whether community cohesion and character is being affected? Outside consultants will not have the same perspective on impacts to community cohesion as residents and local business people. This is extremely important and should not be treated lightly.
 - How will the Environmental Justice analysis be conducted? It is not right to take the view that a census tract in Detroit already suffers from air quality or traffic congestion, as do many other census tracts in Detroit, so there is no disparate impact. Impacts to the local host community must be analyzed in relation to the rest of the region or state (which are the true beneficiaries of any new border crossing project).
 - In evaluating consistency with local plans, the Border Partnership must make every effort to learn about proposed development plans from community members since many projects may not need any municipal approvals, other than building permits, and would not appear in any "official planning documents." This evaluation must be very broad and reach out to local community development corporations and neighborhood groups in order to be accurate.
 - In evaluating cultural resources, community resources should be considered, like a local church that is a repository for neighborhood history. A neighborhood restaurant that is a magnet for the Hungarian community is a cultural resource that should be preserved and protected.
 - Again, regional mobility must be considered more broadly than just cars and trucks. We cannot have a functioning region without mass transit. This is an opportunity to develop improved infrastructure between Detroit and Windsor. In addition, the State of Michigan just spent millions of dollars studying the expansion of intermodal freight at the Livernois-Junction Yard. How can improving cross border rail infrastructure not be considered?

Concerns related to the methodology for selecting alternatives to be studied in the EIS.

- The weighting system for the factors used to evaluate the illustrative alternatives is flawed. Because completion of surveys was self-selected, the survey sample could be skewed. The data set only represents the opinions of those efficacious enough to

become involved or those who were specifically approached to complete a survey. Forms were not distributed in Spanish until too late in the process. The data could be skewed towards a particular community affected by the study. In addition, the Border Partnership relied solely on the Local Advisory Committee to distribute surveys.

- Cost-effectiveness method may be flawed, since it is not clear how more costly projects will really be treated. Some of the downriver projects could have an advantage for *non-selection* because the much longer freeway connections would increase the overall cost of the projects.
- The plaza sizes are not consistent, which might make the playing field for review of the illustrative alternatives uneven.
- Why are the impacts to the US Steel facility in Ecorse not considered a "fatal flaw" in the analysis of alternatives? US Steel represents the major source of tax revenues to the City of Ecorse. Impacts to their property could substantially reduce the ability to do business at that location and thus destroy the tax base of Ecorse.

Important! Would the elimination of an entire neighborhood be considered a "fatal flaw?" If not, it should be. As we have seen with projects like Poletown project, more is lost than simply homes when an entire community is wiped out.

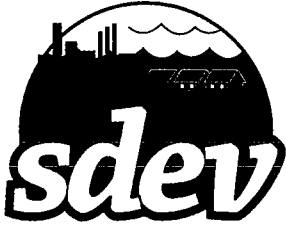
Other comments related to the EIS Process:

- Important*
- Should an additional border crossing be pursued for construction anywhere along the Detroit River, the Environmental Impact Statement must include a Community Benefits Agreement between members of the host community and the project sponsors.
 - There should be open discussion and debate regarding the most appropriate governance structure for the next border crossing. This discussion is not site-specific.
 - All state and federal agencies participating in the DRIC study should agree to a moratorium on issuing all new permits related to new or expanded border crossings along the Detroit River until the DRIC study is complete.
 - The DRIC study should include an alternative that encompasses improvements to existing border crossings (such as plaza improvements or freeway improvements), but does not necessarily include the construction of a new span. Particularly in Southwest Detroit, MDOT should help develop a plan for border-related improvements that the community can rely on, as opposed to the constant uncertainty created by private actors.
 - Given the complexity of the study, the community should receive some resources to help them organize, understand the study, and be fully engaged.

- Given the concentration of transportation uses and proposed transportation projects in Southwest Detroit, a comprehensive transportation study is needed to truly understand the impacts of any transportation project in Southwest Detroit.
- The study and consultant team must give adequate acknowledgment to the revitalization that has taken place in Southwest Detroit. Southwest Detroit is the only growing area of the City of Detroit and is considered a model of community development. There is \$170 million in housing, commercial redevelopment, infrastructure, parks and greenways investment projected for Southwest Detroit over the next three years, just based on the work of nonprofit community development organizations. The future of the City of Detroit rests in neighborhoods like Southwest Detroit. None of the documents prepared so far by the Border Partnership acknowledge this. Proper consideration must be given to the tenuous balance between transportation infrastructure and neighborhood revitalization. What will the analysis of the impact of a new border crossing to the City of Detroit consist of? Will this analysis look at the impact to future development in SW Detroit, the potential loss of tax revenues, etc? Will there be a true cost-benefit analysis to understand this long term impact?

* The existing border crossing should be held accountable for the negative impact it has on the neighborhood. By holding out or delaying any permits to expand would + should be the first step until a decision is made to build a "public/private" border crossing - Otherwise we might as well live in the Wild West! — Where nobody is accountable to anybody (city/state/federal/government) —

The DIBC should not be allowed to behave w/ disdain to their neighbors —



Southwest Detroit Environmental Vision

P.O. Box 9400
Detroit, MI 48209

Phone: (313) 842-1961
FAX: (313) 842-2158
Email: swdev@flash.net

September 30, 2005

Mr. Mohammed S. Alghurabi
Senior Project Manager/ MDOT
Bureau of Transportation Planning
425 W. Ottawa Street
Lansing, Michigan 48909

RE: Scoping Comments for the DRIC Study

Dear Mr. Alghurabi:

On behalf of Southwest Detroit Environmental Vision, I thank you for the opportunity to provide comments on the scoping documents for the Detroit River International Crossing Study. SDEV's comments are mainly concerned with environmental issues and neighborhood impacts.

A project of this size will affect the community in which it is built for years to come. We ask that the environmental impacts of such a huge undertaking- particularly air quality issues- be studied to the fullest extent possible. We request that air impacts of increased car and truck traffic be projected 'end to end' for any crossing: inside the plazas, in the communities close to the plazas and all new connecting approaches and roadways. Health effects of diesel exhaust are a major concern in our community. We ask that all harmful pollutants such as PM 2.5, air toxics and ozone precursors be evaluated, especially given Southeast Michigan's status as a non-attainment area for air quality. The close proximity to many recognized stationary sources of air pollution must also be studied to determine the total burden of air quality degradation from all sources.

Many of the proposed plaza locations will have deleterious effects on surrounding communities, as residential land is transformed into monolithic transportation infrastructure. Revitalized and historic neighborhoods of Southwest Detroit, where millions of dollars of new investment has taken place, could not survive. One location, Plaza C3- Delray West, literally wipes put an entire residential community because of its large size.

Finally, public policy issues of border crossing ownership and operation must be reviewed carefully. Competing interests proposing privately financed bridges or tunnels vying with international proposals of this scope will not serve the public.

Thank you very much. I look forward to participating in the next phase of the study.

Yours truly,

Alison Benjamin
Alison Benjamin

October 4, 2005

Mr. Mohammed Alghurabi, P.E.
Senior Project Manager
Michigan Department of Transportation
Bureau of Transportation Planning
425 W. Ottawa Street, P.O. Box 30050
Lansing, Michigan 48909

Dear Mr. Alghurabi:

We have reviewed the Detroit River Crossing Scoping Document and have the following comments. Comments are grouped into the broad comment areas of planning and process, environmental, engineering, and editorial.

Planning and Process

A specific project is not included in either the adopted SEMCOG 2030 Regional Transportation Plan (RTP) or Transportation Improvement Program (TIP). Before any dollars can be programmed to implement the outcome of this study, the RTP and the TIP must include a specific project.

The scoping document concentrates on the U.S. side of the evaluation, but some information should be provided about the Canadian portion of the project. More information is needed on Canadian termini, its process, timelines, and what options are found acceptable. In addition, there should be some discussion regarding how the U.S. illustrative alternatives will be combined with Canadian results (Section 5.3.2, page 40)?

The partnership Steering Committee, the Working Group, and the consultants should be defined in the Public/Agency involvement section (Section 4, page 11). The terms are used starting on page 30 (Section 5.3, Evaluation Process).

While we agree that the process needs to be streamlined, the document should clarify that the evaluation process will not be compromised/compacted to meet those deadlines (Section 5.3, page 30).

The U.S. illustrative alternatives screening process could be further clarified to indicate how it will be included in the overall process (Section 5). The scoring form (Section 5.3.2, page 40, and Table 9) appears to be part of this process, but the text does not elaborate on how the form was used, or how it fits into the overall process.

Paragraph three of Section 5.3, should clarify what is means by the phrase, “solutions outside the Detroit River area do not meet the project’s purpose and need”.

Mohammed Alghurabi
DRIC Scoping

Environment

Table 8 is confusing and should be made clear. (Section 5.3.1, page 38, 39)

Also, the number and location of contaminated sites in the area; as well as the number of acres of wetlands affected, should be included in Table 8 as performance measures.

The scoping document includes little detail on the proposed air quality analysis. Additional documentation should be provided.

Engineering

The document does not indicate if intelligent transportation systems (ITS) solutions will be incorporated into the proposed solutions.

Section 5.3.1 (page 40) should consider intersection levels of service/delay along with the link service levels mentioned to improve regional mobility.

Editorial

A clear, concise, statement of what the study is (new crossing) and is not (overall border improvement plan) would help orientate the reader. For example, the first sentence in the introduction does not convey what is to be studied, but reads like a mission statement.

Freeway exit names would be useful for context (page 29 figure 12).

Thank you for the opportunity to comment on the Scoping Document for the Detroit River Crossing document. We look forward to working with you to complete this important project. Please contact me if you need additional information or have questions about any of our comments.

Sincerely,



Carmine Palombo, P.E.
Director
Transportation Programs

CP:sw



SOUTHWEST DETROIT
BUSINESS ASSOCIATION

7752 W. Vernor Highway • Detroit, Michigan 48209

Phone: 313/842-0986

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FAX

Date: 10-4-05

Pages (Including Cover) 5

To: Mohammed alghumai

Company: MDOT

Fax Number: 517-373-9255

From:

Jennifer Fitzpatrick ext: 30 Cynthia Rosales ext: 24

Karen Kavanaugh ext: 26 Nancy Sizer ext: 28

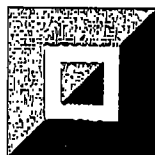
Deb Sumner ext: 25 Kathleen Wendler ext: 22

Amy Raupp ext: 27 Theresa Zajac ext: 23

Olga Ortiz ext: 21

DRIC

Message: RE: SCOPING COMMENTS



SOUTHWEST DETROIT

B U S I N E S S A S S O C I A T I O N

September 30, 2005

Mohammed Alghurabi, Senior Project Manager
DRIC Study, Bureau of Transportation Planning
P.O. Box 30050
Lansing, MI 48909

Dear Mr. Alghurabi:

The Southwest Detroit Business Association (SDBA) is pleased to comment on the Border Partnership's Detroit River International Crossing (DRIC) Study Scoping Information. We provided comments during the Scoping Meeting on August 31, 2005 and are reiterating points raised during that meeting and including additional comments in this correspondence.

The SDBA supports the completion of the DRIC Study. Without a comprehensive analysis there is no rationale for a determination of any sort: whether and when another border crossing is needed, short-term strategies for enhancing and improving traffic flows, or the optimal location for expanded or new border crossing facilities. While it is beyond the expertise of the SDBA to know whether all feasible locations in the Ontario and Metropolitan Detroit region have been identified for analysis, the inclusion of several alternative locations outside of Southwest Detroit offers an opportunity to broaden the discussion on the function of an international border crossing to the state and regional economies *and* the impacts on the economy of the local host community.

Predictability is a necessary ingredient for investment. Southwest Detroit has long endured a climate of unpredictability on proposed transportation projects. This situation has hindered community development by undermining the environment for public and private investment in housing, commercial, recreational, and open space. The most recent public example is the Michigan Department of Transportation's proposed Detroit Intermodal Freight Terminal project which has been discussed and studied for over a decade. On the private side, the continual change in the Detroit International Bridge Company's planning and plaza needs for the Ambassador Bridge has led to the loss of an entire section of the neighborhood, including homes and businesses. Despite this, Southwest Detroit remains one of the only growing neighborhoods in the City. Continuing this growth is substantially challenged by the unpredictability associated with several major proposed transportation projects. It is imperative, therefore, that the DRIC Study is completed and a final recommendation made in the most expeditious manner possible. **Additionally, if the DRIC Study is to have any relevance, all state and federal agencies which have a role in expanded or new border crossing facilities**

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Southwest Detroit Business Association
September 28, 2005

must agree to a moratorium on processing any permits or other requests that would further the implementation of any privately-sponsored border crossing proposals until the DRIC Study has been completed.

Related to predictability, the SDBA supports the inclusion of the Detroit International Bridge Company's (DIBC) most recent plaza expansion concept for the Ambassador Bridge in the DRIC Study. The inclusion of this plan will, at a minimum, result in information on the efficacy and impact of the plaza expansion. This analysis is not likely to occur outside of the DRIC Study.

Governance of the New/Expanded Detroit River International Crossing

The governance structure of new or expanded international border crossing facilities is a critical policy issue and is one of the most important issues involved in this discussion to the SDBA. To date, the debate and deliberation of ownership and governance has occurred exclusively in private. This discussion must occur within the public realm and with public participation. Southwest Detroit has a particular experience with the dynamics and impacts of one of the only privately-owned international border crossings in North America. This experience has not been a positive one for community growth and revitalization. The profit-making motives of this private enterprise have oftentimes conflicted with community development objectives. Moreover, the transportation enterprise controlled by the DIBC, and its related companies, has led to ever more land speculation in Southwest Detroit.

The aftermath of Hurricane Katrina underscores one of the most basic functions of government: to protect citizens. The economic role of an international border crossing and its potential as a security target are compelling public interests which should be controlled and protected by the public sector. The ownership of any new or expanded international border crossing should follow the rule in Michigan, not the exception, and must be public.

Purpose and Need Statement

The conventional approach to transportation infrastructure planning in Southwest Detroit has focused narrowly on expanding transportation routes and reducing congestion. Transportation infrastructure, while a necessary land use, does not typically result in tangible community benefits or support community development objectives. The communities that host massive transportation infrastructure would benefit by coordinating transportation investments with local economic development and community revitalization strategies.

The purpose and need statement should explicitly support local economic development and promote a positive context for public and private investment in the host community. Creating economic development opportunities, diversifying the local economy, and creating jobs should be a goal of any new or expanded international border.

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Whether there is a need for expanded or new border crossing facilities, and when that need will arise, has been widely debated. The Border Partnership must ensure that rigorous modeling is used to establish need, that it is disseminated, and understood.

Air Quality

Air quality must not be compromised. A local analysis is needed as a regional analysis will provide no information on the impacts to the proposed host community. Local air quality impacts should be further understood through an assessment of their health impacts. Southwest Detroit already has serious problems in complying with air quality standards. The application of the air quality impacts of expanded or new border crossing facilities will yield different results across communities. Further eroding a community's air quality through the location of expanded or new border crossing facilities should be considered a cost or a "fatal flaw."

One of the challenges to improving air quality in Southwest Detroit is the imperfect data and information available to establish a baseline: What is the context today? What are the primary sources of air toxins? What are additional contributors to air toxins? What are the best mitigation measures for mobile and point sources of pollution? How do we ensure that air quality is continually, if incrementally, improved? Should any of the "Illustrative Alternatives" in Southwest Detroit advance to "Practical Alternatives," an air quality baseline must be conducted. It is impossible to make informed decisions on air quality solely on the basis of a regional analysis. The local impact within the existing air quality context must be known.

Community Benefits Agreement

Should new or expanded border crossing facilities be implemented along the Detroit River, the Environmental Impact Statement must include a Community Benefits Agreement between members of the host community and the Michigan Department of Transportation.

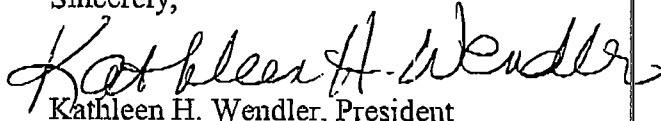
Comprehensive and Cumulative Transportation Planning and Impact Analysis

The Gateway Communities Development Collaborative (GCDC) is an association of community development corporations in Southwest Detroit and the SDBA has been a member since its inception in 1999. For several years, the GCDC has advocated that the Michigan Department of Transportation, the Federal Highway Administration, the Southeast Michigan Council of Governments, and the City of Detroit commence a comprehensive and cumulative impact analysis of the proposed transportation projects in Southwest Detroit. The goal of this planning is to provide information that would assist all parties in developing a vision for the development of Southwest Detroit and would incorporate community development goals with transportation infrastructure investment. Such an analysis would further assist in determining the limits of a community's ability to host massive transportation infrastructure and remain a viable place for residential, neighborhood commercial, and recreational investment.

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Thank you for the opportunity to comment on the DRIC Study Scoping Information. The SDBA will continue to participate in this important discussion.

Sincerely,



Kathleen H. Wendler, President
Southwest Detroit Business Association

DRIC Scoping Comments
Southwest Detroit Business Association
September 28, 2005



12th House District
Southwest Detroit

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COMMERCE
GOVERNMENT OPERATIONS
(Min. Vice-Chair)
LOCAL GOVERNMENT AND
URBAN POLICY
(Min. Vice-Chair)

September 28, 2005

Mr. Mohammed Alghurabi
Senior Project Manager
DRIC Study, Bureau of Transportation Planning,
P.O. Box 30050
Lansing, MI 48909

Dear Mr. Alghurabi:

Thank you for this opportunity to provide comments regarding the scoping of the Detroit River International Crossing Environmental Impact Statement (EIS). Due to legislative session on August 31, my staff person, Olga Savic, participated in the Scoping Meeting on behalf of my office. In addition to the comments that she made at the meeting, I would like to reiterate the following points:

Omissions in the Purpose and Need Statement

I do not believe that the Border Partnership has adequately made the case that additional highway lanes over the Detroit River are the only way to meet the stated Purpose and Need for this project. The scope of the study should be broadly focused on increasing the effectiveness of the border as an economic engine for our region with respect to, not only commerce and trade, but also tourism, and must go beyond simply discussing the number of traffic lanes.

(1) A broader view of the economic potential of the border is justified.

The Purpose and Need Statement needs to look at all of the economic development potential of our border with Canada, beyond just that of manufacturing. It should also address development potential in the host community and in terms of regional and statewide tourism.

The Purpose and Need Statement should have explicit language that a new border crossing should enhance the economy of the host community. A new goal "Create new economic opportunities and local jobs in the host communities" should be added under "Project Goals and Objectives." With the well-documented decline of manufacturing in Michigan, the economic development potential of local, regional, and statewide tourism must be considered as a goal in the Purpose and Need Statement, with the addition of a new goal "Maximize the local, regional, and statewide tourism potential of a new border crossing."

Much of the justification for the purpose of the project is the manufacturing potential of the Detroit-Windsor area. While manufacturing currently plays an important role in our economy and will continue to do so in the future, manufacturing's current decline requires us to broaden our investigation to other economic sectors. I am concerned that the models used by the Border Partnership Study to project future manufacturing potential are inconsistent with the economic forecasting done by our Senate and House Fiscal Agencies, which shows the manufacturing sector continuing to be weak.

(2) A broader view of the transportation network is justified.

While trucks and cars are a popular way to move goods and people, the Border Partnership has not adequately made the case that all other modes of transport across the border do not meet Purpose and Need. Given that almost 80% of the passenger traffic between the US and Canada is local, the Purpose and Need Statement should include language related to the exploration of cross-border mass transit as a way to accommodate increases in future passenger traffic. In addition, given that 80% of the truck traffic is traveling long distance, the Purpose and Need Statement should include language related to the exploration of rail as a way to move freight across the border.

In Local Advisory Committee meetings, MDOT and its consultant have indicated that neither investments in mass transit nor rail infrastructure meet the Purpose and Need. Yet, in the Detroit Intermodal Freight Terminal study, MDOT and its consultant consistently argued that investments in intermodal rail would spur growth in that mode of transport. It would seem that, particularly with the possibility of considerable investment in the nearby Livernois-Junction Yard, significant investment in cross-border rail, such as a second rail tunnel, might spur private sector shifts to rail for cross border traffic and economize overall transportation investments. We should be thinking about investment in border infrastructure as a way to create a *sustainable* regional transportation system, one that balances traffic across several modes of transportation.

Finally, the Purpose and Need should have a greater focus on improving advancements in border processing or transportation technology as an alternative to increasing highway lanes across the Detroit River, particularly with the pace of technology improvements and innovations since 9/11. The study should be evaluating improvements or expansion of existing plaza infrastructure to accommodate increased traffic needs. The study should help design a high-tech border ready for the 21st century that can serve as a model for the rest of the country.

(3) Security means more than physical security.

The Purpose and Need statement takes a narrow view of "Security" as just physical security. "Security" should also include economic security. The economic losses due to the border delays after the September 11 attacks demonstrate this. The current War on Terror suggests economic targets, like a border crossing, are every bit as threatened as people.

Among economic security issues, the study should investigate the appropriate ownership structure. A privately-owned border crossing has undue influence in commerce and trade between the US and Canada. Changes in tolls or other private decisions can be as crippling to manufacturing as a terrorist attack. There is a public interest in exploring other governance structures and this should be explicitly stated in the Purpose and Need Statement as a new goal, "Ensure that the economic interests of the State of Michigan and United States of America are protected with adequate public oversight."

Evaluation of the Illustrative Alternatives:

I have several concerns about the evaluation process for the illustrative alternatives. This process is extremely important as it will lead to the choice of practical alternatives for study in the Environmental Impact Study. The weighting system for the factors used to evaluate the illustrative alternatives is based on a potentially skewed data set. Because completion of surveys was self-selected, the data set only represents the opinions of those efficacious enough to become involved or those who were specifically approached to complete a survey. Forms were not distributed in Spanish until too late in the process, potentially omitting an important segment of the affected population. In addition, the Border Partnership relied solely on the Local Advisory Council to distribute surveys. If the weighting system based on community preferences was to be taken seriously, it seems that more care should have been taken to ensure a statistically relevant sample set.

1. *Maintain Air Quality:* An analysis of regional burden may not give adequate consideration to the air quality impacts of the host community. The analysis of the local air quality impacts should include an analysis of health impacts. The air toxics being studied are known cancer-causing agents or are known to have non-cancer health impacts beyond health protective levels. Some analysis of health impacts must be undertaken. This is particularly true given the importance being placed on protection of the natural environment. The health of humans is just as important as the health of wildlife and plant life.
2. *Protect Community/Neighborhood Characteristics:* It is not clear how community cohesion will be evaluated or if the cumulative effects of previous projects which impacted the community will be considered. I also am concerned that the community will not be adequately consulted in determining whether community cohesion and character is being affected. Outside consultants will not have the same perspective on impacts to community cohesion as residents and local business people. This is extremely important and should not be treated lightly. In addition, I am very concerned about how the Environmental Justice analysis be conducted. Impacts to the local host community must be analyzed in relation to the rest of the region or state, which are the true beneficiaries of any new border crossing project.
3. *Maintain Consistency with Local Planning:* In evaluating consistency with local plans, the Border Partnership must make every effort to learn about proposed development plans from community members since many projects may not need municipal approvals, other than building permits, and would not appear in any "official planning documents." This evaluation

must be very broad and reach out to local community development corporations and other neighborhood groups, especially those that have taken the time to engage in long-term planning efforts, in order to be accurate.

4. *Protect Cultural Resources:* In evaluating cultural resources, community resources should be considered, such as a local church that is a repository for neighborhood history or a neighborhood restaurant that has long been a magnet for an ethnic community.
5. *Improve Regional Mobility:* Regional mobility must be considered more broadly than just cars and trucks. The DRIC study is an opportunity to develop improved infrastructure across the transportation system between Detroit and Windsor. In addition, the State of Michigan has spent millions of dollars studying the expansion of intermodal freight at the Livernois-Junction Yard. I find it inconceivable that improvements to cross border rail infrastructure are not being considered.

In addition, I am concerned about the methodology for selecting alternatives to be studied in the EIS, primarily due to the use of cost-effectiveness to select the practical alternatives. It is not clear how more costly projects will be treated in this method. For example, a plaza site with several miles more of freeway connections may be so much more expensive that it actually has an advantage for *non-selection*. I hope that MDOT would consider evaluating plaza sites with an optional second set of freeway connections (out to a second freeway, like I-94) both by looking at their full length and also by looking at them only to the first freeway to which they connect.

Finally, I am not sure how MDOT will determine a “fatal flaw.” It seems that the impacts to the US Steel facility in Ecorse should be considered a “fatal flaw” in the analysis of alternatives given that US Steel represents the major source of tax revenues to the City of Ecorse. Impacts to their property could substantially reduce the ability to do business at that location and, thus, destroy the tax base of Ecorse. In addition, I would argue that the complete elimination of an entire neighborhood could be considered a “fatal flaw.” As we have seen with projects like the GM Poletown Plant, more is lost than simply homes when an entire community is wiped out.

Other Requirements for EIS Process:

The DRIC study is an opportunity to create a plan for border infrastructure in the Detroit region that serves Michigan’s needs into the 21st century. However, in order to preserve the integrity of this process, all state and federal agencies participating in the DRIC study should agree to a moratorium on issuing all new permits related to new or expanded border crossings along the Detroit River until the DRIC study is complete. The absence of such a moratorium calls into question the DRIC study’s value and will discourage interested parties from fully participating.

The DRIC study should include an alternative that encompasses improvements to existing border crossings (such as plaza improvements or freeway improvements), but does not necessarily include the construction of a new span. I am hopeful that MDOT will study the proposed expanded Ambassador Bridge plaza, which was recently added as an illustrative alternative, in that way. By looking at the border-related improvements needed at existing crossings, the Border

Partnership will help create a plan that the local community can rely on, as opposed to the constant uncertainty created by private actors pushing new expansion proposals each year.

In addition, should an additional border crossing be pursued for construction anywhere along the Detroit River, the Environmental Impact Statement must include a Community Benefits Agreement (CBA) between members of the host community and the project sponsors to help achieve some positive benefits for any host community impacted by this project. A CBA should outline the respective understanding between community representatives and the Border Partnership on the type and level of benefits and mitigation actions for the host communities. Although this has not traditionally been MDOT's practice, given the complexity of the DRIC study, the community should receive some resources to help them organize, understand the study, and be fully engaged.

If a location in Southwest Detroit or affecting Southwest Detroit advances as a "practical alternative" and is studied in the EIS, I am very concerned about the rigor of analysis that will be undertaken to determine the economic impact of additional transportation infrastructure to the City of Detroit. The analysis must look at the impact to future development in Southwest Detroit and pressures that it will create on the growing housing and neighborhood commercial development.

Finally, there must be an open discussion and debate regarding the most appropriate governance structure for the next border crossing. I understand that this discussion is taking place at a higher policy level, but this issue is as important as any design feature because it can have long-lasting impacts on the future development of a new crossing.

Conclusion

I again call on MDOT to undertake a comprehensive transportation study to truly understand the impacts of any transportation project in Southwest Detroit. Each transportation project is treated as a "silo" without any coordination between projects and any study of cumulative impacts of all the current and proposed transportation uses in the community.

In addition, I urge the study and consultant team to give adequate acknowledgment to the revitalization that has taken place in Southwest Detroit. Southwest Detroit is the only growing area of the City of Detroit and serves Michigan as a model of community development. There is an estimated \$170 million in housing, commercial redevelopment, infrastructure, parks and greenways investment projected for Southwest Detroit over the next three years, just based on the work of nonprofit community development organizations. The future of the City of Detroit rests in neighborhoods like Southwest Detroit. None of the documents prepared so far by the Border Partnership acknowledge this. Proper consideration must be given to the tenuous balance between transportation infrastructure and neighborhood revitalization.

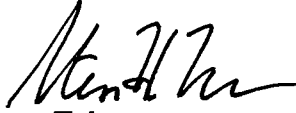
Mr. Mohammed Alghurabi—DRIC Scoping Comments

September 28, 2005

Page 6

I hope that the Border Partnership will address the concerns outlined in this letter and incorporate my comments into the DRIC study.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Tobocman". The signature is fluid and cursive, with a large initial "S" and a long, sweeping underline.

Steve Tobocman

State Representative

12th District, Southwest Detroit

Detroit International River Crossing
Environmental Impact Study
Scoping Information – Public Comment
Friends of the Detroit River

During the August meeting of the Local Advisory Counsel, Michigan Department of Transportation (MDOT) and The Cordino Group presented Scoping Information and requested public comment. The information provided during the presentation at the August Local Advisory Counsel Meeting, and the hard copy material provided leaves many concerns still unanswered, and does not provide proof of an immediate need for an additional crossing in Southeast Michigan. Conversations with others concerned about how the site selection process will be completed, and what factors will be most important in making the final determination as to where the new cross will be put also warrant discussion.

In determining the actual location for the new crossing, it is a fact that no matter which alternative is selected, the crossing will be in someone's back yard, and one or more Southeast Michigan and Ontario communities will be impacted. Whether the crossing is built by 2013, or 2030, this fact does not change. It will not be possible to select a location where everybody is happy with the decision. It is imperative that everyone involved feel that they are being treated fairly and equally as is consistent with our Constitution and laws.

There are areas in which any negative impact or potential negative impact is unacceptable. It is much more difficult to relocate an ecosystem than it is to relocate a household. How do you tell migratory birds or spawning fish that their home has been moved while they were away? You can not put out signs that say don't land here, go twenty miles down the road to the next prairie. There is no way to reproduce the exact environment with all the species of plants, insects, and animals of an existing sight. There is no magic to transfer an ecosystem from one location to another location.

It is also difficult to accurately measure or predict how changes to an ecosystem or the area around an ecosystem will affect the ecosystem. 200 years ago, this area had vast amounts of coastline, prairie land, and oak savannas. We no longer have an abundance of natural areas that have not been impacted by development or environment disruption. For these reasons, no alternative location for the river crossing should be allowed to go over, under, or through any of the few remaining natural preservation areas on either side of the border.

In narrowing the list of alternative options down to one potential river crossing, MDOT, the Federal Highway Safety Administration, the Cordino Group, and other government agencies need to provide answers to many questions, and provide the missing information requested by members of the LAC and residents of Southeast Michigan. In justifying the need for a new crossing the Cordino Group has repeatedly shown a Travel Demand vs. Capacity graph depicting a marked decline in demand since 1999 that magically shifts to a rapid increase in demand in 2004 - 2005. There has never been an adequate

explanation providing positive proof the demand drastically began to trend upward starting in 2004. The data and analysis that proves the dramatic changes in Demand vs. Capacity should be provided to allow for independent analysis.

An argument has been made that the impact on jobs should no new crossing be put in place are in the order of 25,000 jobs in Michigan and 79,000 jobs in the US. Would these Michigan jobs be lost regardless of whether or not a new crossing is built? The chart provided by the study group titled “2004 Daily International Traffic (Two-Way) Crossing Windsor – Detroit By Vehicle and Trip Type” shows that 50% of the traffic is long distance. In effect, the largest share of the traffic does not benefit Windsor or Detroit, but passes through on their way to some place else. Removing the bottleneck could increase the rate in which jobs are lost in Michigan, the Detroit Metropolitan Area, and Windsor. As both Windsor and Detroit have high concentration of union jobs, higher standards of living, and higher pay scales, the jobs being added could have a net negative impact on the both Southeast Michigan and Southwestern Ontario. Yet these are the areas, which will also have to bare the burden on welcoming the new crossing into their communities, and pay a lion’s share of the costs.

The 2004 Daily International Traffic data provided in the charts also needs to be validated. Are the days the measurements were taken truly a positive representation of the normal traffic crossings on a daily basis? How did the measured days compare with the same days in prior years? What was the average wait time of vehicles attempting to cross during those day? Were there any special circumstances on the days measured causing the traffic to be abnormally high or low in comparison to the rest of the year? The chart provided without context does not give the LAC or concerned residents the opportunity to review the actual information or the story that the data tells. It is like taking a single word from a book and asking Southeast Michigan to understand the book.

How does MDOT or the Federal Highway Administration plan on making sure all three crossing once the new one is built will get enough traffic to be viable? If the estimates for increased demand are wrong and the additional capacity is not needed, there may not be enough traffic to support the cost of maintaining three river crossings? The railroad companies are also requesting an updated crossing to handle taller railcars. Improved infrastructure for rail may also affect the rate of growth in demand for river crossing truck traffic. Was the potential of a new rail crossing considered, and the possibility of it altering the truck traffic demand increases factored into the study?

What will be done to make sure all three crossings are actually used efficiently? What will be done to prevent too high a percentage of the traffic from going to the new crossing location, under utilizing the existing crossings, and causing traffic problems in the new location? Who will bare the burden if one of the river crossings cannot compete and is forced out of business?

Most of the data provided attempting to validate the need for a new crossing is much the same as the two examples discussed in the above paragraphs. There has been little information or discussion on process improvements or better border resource

management, and how either of these could, at least in the short term, alleviate some of the crossing delays. Regardless of the outcome of the Environmental Impact Study, the soonest a new crossing will be completed is seven years away. If the predictions of continual increased need in crossing capacity are correct, the current crossings will become gridlocked long before the new crossing is completed. Is the Gateway Project the answer? Since a border crossing includes connecting highways approaching and leaving the crossing area, the plazas, customs clearance, tollbooths, and the actual crossing infrastructure itself, it is necessary to look at the entire process, not just the bridge capacity. Adding crossing capacity and not truly improving the entire end-to-end process may not be correcting the real problem, only masking it.

There has also been very little discussion on whether technology can assist in improving the process and shorten delays. For example, electronic tracking of vehicles requesting an opportunity to cross, a scheduled (appointment) crossing period for each vehicle, management of all three crossings as resource and balancing the loads across all three. Is there technology available to assist in dealing with the traffic issues and demands that are being used to justify a new crossing?

Once the new crossing does come, the consultants, MDOT, and Federal Highway Administration pack up all their equipment moving on to the next project, what's next? Will the State and Federal government come rolling in with city planners, social workers, environmental experts, consultants, and the dollars to pay for them? Where are the people that should be talking to the mayors, city managers, supervisors, planning commissions to help them prepare for what could be coming to their neighborhoods if the crossing does come to their home towns? Will there be assistance to those communities to help pay for additional infrastructure required to support the new river crossing? Can economically depressed areas actually afford a new crossing in their neighborhoods? With State, County and local budgets as tight as they are today, can any community in Southeast Michigan afford the costs associated with a new crossing?

Even if the rosy predictions for new business growth due to a new crossing are true, the increases in business will lag behind the increases in costs to the communities. Associated with the Environmental Impact Study must be recommendations that discuss how and where Southeast Michigan will get help for everything else that will be impacted because a new river crossing has come to their area. There must be identified sources for the money and expertise needed to keep the communities from suffering severe economic hardships due to the crossing. There is more that needs to be taken care of than just the 300-foot impact areas and plaza locations identified on the map of alternatives options.

It has been well documented that the US team will not be completing a health impact study due to the inability of US officials to agree on the metrics that need to be taken, and precisely what incremental increases in pollutants cause which health risk. There has been no argument presented that high concentrations of truck emissions raises the probability of contracting specific health problems. So, the US sponsors of this study have decided not to gather information, not to set base lines, not to do anything that would help in the future to answer the questions about impacts to health from

environmental changes. This is the kind of thinking that has allowed us to get where we are today, without documented measurements to tell us what the impact of pollutants are on human health. These types of decisions make it very difficult for our scientists to actually answer the question of how much is too much. The Canadian laws are different, and they will be required to complete a health impact analysis.

It may be that these questions and concerns have already been considered in prior stages of the process. If they have not been addressed, they should be prior to the completion of the Environmental Impact Study, and the recommending of a sight for the new crossing. Items which may not be considered within the scope of the Environmental Impact Study need to be discussed and answered somewhere within the site selection process. Assumptions being made about demand, impact, value, and opportunity cost must be reviewed, refined and validated to make sure this study and prior processes already completed did not bare results based on false assumptions. We need positive proof that there is a capacity issue before we create a huge disruption in the lives of the people of Southeast Michigan. And we need to be assured that the net effect of the new river crossing will not be negative to the communities and the State of Michigan.

Thank you
Henri J. LaFrance
Friends of the Detroit River.

September 29, 2005

Mohammed Alghurabi, P.E.,
Senior Project Manager,
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Bureau of Transportation Planning,
425 W. Ottawa Street,
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Dear Mr. Alghurabi,

Please find below a summary of my comments from the meeting held at Cobo Hall on August 31, 2005.

I would begin by pointing out that the graphic on page 6 of the Scoping Information handout provided on August 31, 2005 is incorrect. The side at the top of the page showing the Windsor-Detroit Future Capacity needs suggests that time Capacity is reached for both US Border and Canadian Border processing at the Detroit Windsor tunnel is 5-10 years away. That is an entirely inaccurate statement as **traffic is backed-up now on a daily basis**. This back-up (in Windsor) results in traffic chaos virtually every morning along Wyandotte street, where grid-lock is the norm due to closure of the tunnel as a result of processing delays on the US side.

Similarly, back-ups along Jefferson Avenue with traffic backed-up under Cobo Hall are not unusual in the late afternoon and particularly on Fridays.

A shut-down of any of the crossings due to heavy traffic volumes clearly indicates that we are at capacity now. Suggesting that the problem is worse at certain times and non-existent at 2:00 am is illogical and ignores real-world constraints.

The Ambassador Bridge is also clearly at capacity during peak hours with traffic back-ups on the US side onto I-75. On August 31, I noted the running back-log on to the Interstate lasted more than 6-hours. These are all clear indicators that we are at capacity now.

Please be sure that data reflects reality and is dated to show the time period that information was gathered.

In regard to back-ups on the bridge, MDOT needs to implement an earlier exit off I-75 NB for trucks either off Clark Street or, develop a new exit between Clark & Porter for trucks only that will remove the congestion and back-ups that currently exist. A new truck only exit between Clark & Porter Streets up to the service road would avoid the light at Clark Street and, allow truck back-ups to occur on the service road rather than the Interstate. A similar situation exists on SB I-75 and again, a truck only exit and fly-over connecting to a separate truck only entrance needs to be constructed. ***The current situation is extremely dangerous and is a fatal accident waiting to take place.***

I am deeply troubled that reverse customs inspections are not being seriously considered or planned for at any of the crossing in the Windsor-Detroit area. *At a minimum, a plan and viable alternatives with the appropriate infrastructure needs to be developed and put forward for consideration.* A lack of planning for such requirements indicates a traditional, narrow-minded approach to the problems at hand that will result in the status quo. Thinking needs to be 'outside the box' in order to be effective. I would point out that it is traditional thinking that allowed this grid-locked mess to develop in the first place.

We can see the effect on traffic that putting Customs Plaza's and toll at the foot of the bridge has had as a result of decisions made 80-years ago. Given the growth in traffic, these facilities need to be enlarged to be able to accommodate 100-years more of growth. Set-backs need to be implemented as quickly as possible to avoid even greater grid-lock. Given the technology that exists, and alternative solutions, serious consideration needs to be given to untraditional solutions.

MDOT also needs to work with the railroads to eliminate the rail bottleneck that exist at Delray junction. This is a major impediment to rail traffic in South-Western Michigan and seriously limits the viability of rail and intermodal solutions to the region. Rail will continue to be hampered until a fly-over or other long-term alternative to Delray junction is implemented. This must be made a priority in order to avoid a collapse of the rail system in the Detroit region...

An automated rail system for passengers tied into transit systems on both sides of the border to replace the current tunnel bus should also be considered by MDOT and DOT as potential solutions to an over stressed bus system that is unreliable due to over whelming traffic congestion. The automated rail system should also connect into regional (bus) transportation hubs on both sides of the border or at least offer transfer service to those hubs.

Finally, air quality monitoring needs to be significantly improved and increased to demonstrate environmental soundness. Ignoring extensive testing in multiple sites can only lead to delays and challenges. Given the state of technology and improvements being put forward with fuel, engine efficiencies, EPA standards and engine technologies, extensive testing can only validate the minimizing of current pollutants going forward. MDOT is seriously mistaken in not standing up to these challenges. MDOT and MOT should both conduct extensive air quality testing at all 4 current custom's plaza's and include diesel , Co2, Nox, Sox2 and particulate measurements.

Clearly, we need more than 1 additional crossing to limit the future pressure on the flow of goods and services. Given the age and limitations of the current infrastructure, increasing ferry service would take some of the pressure off the Bridge which would be a good start. A DRTP would also reduce pressure on the current infrastructure and a DRTP solution could form the foundation of a wider transportation solution addressing both truck rail and intermodal within perhaps 8-10 years.

The advantage of the above solutions is that they will require a minimum of taxpayer funding compared to a new bridge and, in the short-term, that is desirable. However, there is no question at the end of the day that a new larger major link will be required. Because of the time required however to plan, review, approve, acquire lands, legal challenges and finally construct a new crossing even if the process is launched today, it will not be in a position to take any pressure off the older infrastructure for 15-20 years or more. That is far too long to maintain the status quo, and not to implement other more expedient solutions to keep up with the ever increasing volume of goods and services across our respective borders.

I believe there are multiple solutions to the current problems that exist. However, under the current mechanism, it is largely up to the oversight and management groups to put forward creative solutions. As the field of crossings is further narrowed, it is even more imperative that creative solutions be put forward to resolve nagging issues. We can see today the limitations that exist as a result of decisions made over the past 75-years. I trust MDOT is sensitive to these issues and can provide both leadership and solutions that avoid the pitfalls of the past.

Thank-you for your time and attention to this matter.

Respectfully,

Mark A. Petro,

Suite 601,
4789 Riverside Dr. East,
Windsor, Ontario, Canada
N8Y 5A2.

E-mail: MAPetro@aol.com

To Whom it may Concern:

I am objecting to an International Crossing in the Southern border due to the fact it will affect our area in a deadly economic way. The "idea" of a possible bridge crossing has created an awful fear inside everyone who resides and works in our neighborhoods and Cities. Due to many factors of these economic times that began in the Fall of 2000, then September 11, 2001, then a war, then loss of jobs, then the loss of homes and even health issues have prevented us from a quality of life. The study as it may need to be completed lawfully has created an additional factor which is fear. This has not assisted Wayne County in moving forward to offset those previous factors. We have the largest amount of foreclosures. I have a son attending college in the area and cannot find even a part time job to offset costs. People are being forced to early retirements and also looking for part time positions to help financially. Our State is in a current economic danger and I am thankful our Governor is working diligently in structuring a State to increase job's and security to provide a quality of life for our people. A bridge and/or crossing will increase health risks, threaten our current life styles and not bring more jobs in this particular area, but destroy our community. The Southern corridor has the most neighborhoods, the largest number of families with children. Many Churches, cemetary's, parks, baseball diamonds, soccer fields, football fields with running tracks, many, many Schools, Senior Citizen and Living Assisted Homes, School for Special Needs, School for the Blind, School with 24 hour living quarters for those handicapped, Hockey arenas, tennis courts, and much more. The water ways Down River are beautiful. We have boating, skiing, fishing, and preservation of animal life and wetlands. We have historical buildings, libraries, Funeral Homes, Hospitals, Many Doctor's Office and Rehabilitation Centers. Please do not disrupt our beautiful downriver area. Cities and Townships have put many millions of dollars into infrastructure, neighborhoods, parks and buildings recently to increase the value and productivity of our towns. These same cities have Master Plans that do not include an international bridge.

I plea with you to consider an alternative outside of the Southern corridor. I urge you to consider to create a better plan for the Customs units at the current Ambassador bridge to ease the back ups that exist. I ask that you consider the Jobs Tunnel alternative rather than a new bridge, this seems to be the most economic and practical. I urge you to take the Southern Corridor off the list this November and allow us to continue with bringing our lives back on track. I thank you for your thoughtfulness and compassion you have shown our people during this study. We will not stop fighting.

Respectfully,

Sheri M. Sutherby-Fricke, ABR, CRS, GRI
Wyandotte City Councilwoman
Real Estate One/Realtor
(734) 552-6077

The Detroit River International Border Crossing Comment Form

The Michigan Department of Transportation (MDOT) is sponsoring this Detroit River International Corridor Study in southeastern Michigan. The Environmental Study Phase of the project involves stakeholders and the public through several rounds of meetings over the period ending in 2007. The purpose of the Detroit River International Corridor Study is 1) to provide safe, efficient and secure movement of people and goods across the Canadian/US border on the Detroit River area to support the economics of Michigan, Ontario, Canada, and the US; and 2) to support the mobility needs of natural and civil defense.

GET INVOLVED!

A series of meetings will be held during this study. If you would like to receive notice of future meetings, and have not already received a mailing, please give us your name and address.

* * * PLEASE PRINT CLEARLY * * * **Your name will be held confidential**

Name N. E. Mpras - U.S. Coast Guard

Address 2100 2nd St, S.W. Room 3500

City / ZIP Washington, D.C. 20543

Email _____

How did you learn of this meeting? (Check One) Newspaper Mailer Word of mouth
 Radio Television Other _____
Specify

TELL US WHAT YOU THINK.

We want to know what you think the issues are that affect your area. Is there an issue we should address? Anything you have to say is important. Use the space below and on the back. Or, call 1-800-900-2649.

Leave a message or add your name to the mailing list, if you have not already done so.

Identify and document all the EIS all types of vessels using the waterway where the bridge may cross, including the width and height of those vessels. Assess impact of bridge project on marine traffic.

Respond to all issues submitted by agencies and the public so that when the Coast Guard issues the public notice we will not have to revisit ~~the~~ any issues.

1 of 2

The Detroit River International Border Crossing Comment Form

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*** PLEASE PRINT CLEARLY *** Your name will be held confidential

Name MARVIN PETTY
Address 3007 FIELD
City/ZIP DET. 48214
Email FIELD ST. COMM. ASSOC. INC.

How did you learn of this meeting? (Check One) Newspaper Mailer Word of mouth
 Radio Television Other _____
Specify

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Leave a message or add your name to the mailing list, if you have not already done so.

MEETING SHOULD HAVE BEEN AT A LOCAL CHURCH
LIKE MT ZION MISSIONARY B.C. VANDUYE AT MACK AVE.
IT TOOK TO LONG FOR ME TO ARRIVE.
I ~~BEF~~ DIDNT GET HEAR UNTIL 5:00PM. I LEFT MY HOME
AT 3:00PM. TRAFFIC WAS TO BAD. WHY WOULD
YOU PLAN A MEETING AT 4:00PM IN
DOWNTOWN DETROIT WITH PEOPLE GETTING
OFF WORK. NEXT TIME THE MEETING SHOULD
BE AT THE BUTZEL FAMILY CT. OR
MT ZION B.C CHURCH OR GREATER GRACE
~~CHURCH~~ CHURCH. BOTH HAVE A MEETING ROOM OVER

182

The Detroit River International Border Crossing Comment Form

The Michigan Department of Transportation (MDOT) is sponsoring this Detroit River International Corridor Study in southeastern Michigan. The Environmental Study Phase of the project involves stakeholders and the public through several rounds of meetings over the period ending in 2007. The purpose of the Detroit River International Corridor Study is 1) to provide safe, efficient and secure movement of people and goods across the Canadian/US border on the Detroit River area to support the economics of Michigan, Ontario, Canada, and the US; and 2) to support the mobility needs of natural and civil defense.

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*** PLEASE PRINT CLEARLY *** Your name will be held confidential

Name DENNIS DAVID
 Address 16509 KENNERBEE
 City / ZIP SOUTHGATE MI 48195
 Email D.DAVID1951@WIDEOPENWEST.COM / MAYOR@CI.SOUTHGATE.MI.US

How did you learn of this meeting? (Check One) Newspaper Mailer Word of mouth
 Radio Television Other EMAIL
 Specify

TELL US WHAT YOU THINK.

We want to know what you think the issues are that affect your area. Is there an issue we should address? Anything you have to say is important. Use the space below and on the back. Or, call 1-800-900-2649.

Leave a message or add your name to the mailing list, if you have not already done so.

YOU HAVE HELD A SERIES OF MEETINGS, IN SEVERAL LOCATIONS, SUPPOSEDLY TO GET AN IDEA OF WHAT THE PUBLIC WANTS, OR, HOW WE FEEL. AT EACH EVENT, JOE C. HAS GIVEN THE SAME PROGRAM, SAME EXPLANATION, AND RECEIVED THE SAME RESPONSE: OPPOSITION. EACH MEETING ALSO HAD SOMEONE ASKING IF A HEALTH IMPACT STUDY WOULD BE DONE - EACH TIME EITHER IGNORED OR TOLD THE ISSUE WOULD BE ADDRESSED AT A LATER TIME.

The Detroit River International Border Crossing Comment Form

Additional Comments:

MEANWHILE: THE SAME CHARTS, THE
SAME SLIDES, AND THE SAME SPIEL.

WHY DOES THIS COMMITTEE KEEP
HOLDING THE SAME MEETING OVER AND
OVER? WHY NOT USE THE QUESTIONS
YOU RECEIVE AT THESE EVENTS TO GET
NEW / FRESH INFORMATION THAT BOTH
YOU, AS A COMMITTEE CAN USE, BUT
BENEFIT THE AUDIENCE AS WELL?

YOU STATE THERE ARE OPPORTUNITIES
FOR PUBLIC COMMENT, YET THOSE COMMENTS
GO UNANSWERED /

If possible, please return this before you leave. If not, please mail it to:

Bob Parsons, Public Hearings Officer
Bureau of Transportation Planning
Michigan Department of Transportation

P.O. Box 30050
Lansing, MI 48909
Fax: (517) 373-9255

e-mail us by visiting our Web site at www.partnershipborderstudy.com



22ND DISTRICT
786 HOUSE OFFICE BUILDING
P.O. BOX 30014
LANSING, MICHIGAN 48909-7514
PHONE: (517) 373-0852

E-MAIL: hoon-yunghopgood@house.mi.gov

MICHIGAN HOUSE OF REPRESENTATIVES

HOON-YUNG HOPGOOD

STATE REPRESENTATIVE

COMMITTEES:
EDUCATION,
DEMOCRATIC VICE CHAIR
ENERGY AND TECHNOLOGY

August 31, 2005

Mr. Bob Parsons, Public Hearings Officer
Bureau of Transportation Planning
Michigan Department of Transportation
PO Box 30050
Lansing, MI 48909

Dear Mr. Parsons:

I would like to take this opportunity to comment on the Scoping Document, prepared as part of the Detroit River International Crossing Study. I am greatly concerned about the possible impact a new border crossing would have on the Downriver area, specifically in Taylor and Romulus, which I represent.

I understand the recently completed purpose and need feasibility study determined a long-term need for increased border crossing capacity in Southeastern Michigan. I am further aware that not doing anything to alleviate the current congestion problems could lead to serious costs in the long-term from lost employment and lost production. Given that, I am asking that the serious implications of a new crossing in Downriver be heard and duly noted.

I recognize that the Border Transportation Partnership (comprised of the Michigan Department of Transportation, the United States Federal Highway Administration, the Ontario Ministry of Transportation and Transport Canada) must follow a mandated process in determining a final crossing route. I understand that by rule of law, all alternatives must be examined equally, so as to avoid being "arbitrary and capricious". This process must be open, fair and consider all of the current 19 options equally and that no options can be eliminated prematurely.

That being said, the scoping document points out some important statistics regarding the Downriver Study Area. Over 220,000 people make up the study area. This is significantly higher than the Central Area (population just over 98,000) and the Belle Isle Area (population just over 134,000). Furthermore, Downriver's many transportation services could be negatively affected. For example, flight patterns at the Grosse Ile Municipal Airport could be disturbed due to the height of the piers that would need to be built for the crossing..

In the Downriver area, the Detroit River is approximately three miles wide. Any bridge crossing would likely require piers to be placed in the river, which could impact the environment at a much larger magnitude than the other areas under consideration. The Central Area sees a maximum river width of 1.8 miles, while the maximum width in the Belle Isle Area is 1.1 miles.

The S3 staging area and the S4 staging area both have alternative connectors including Eureka Road to I-275. Both of these suggestions would run right through Taylor and Romulus. Furthermore, both the S3 and S4 staging areas would develop a connector running directly through Eureka Heights Elementary School and the Southland Mall Shopping Center. It seems unreasonable to consider an option that would force closing and demolition of an elementary school and a hub of business activity. In fact the Southern Downriver corridor, consisting of two lengthy connector routes, would have tremendous negative impact to numerous neighborhoods and communities, considerably more than any of the other areas under consideration.

Downriver surely remains the least desirable location for an international bridge. Not only would it slice through our communities, our homes, our schools and our businesses, it could possibly create the worst environmental impact on the River itself. Afterall, the Detroit River is bordered by the Detroit International Wildlife Refuge in Downriver.

Downriver is united in our opposition to the border crossing being placed in our backyards. Testament to this is the 1200 residents that joined me at the June 30 Crystal Gardens Public Meeting to speak in opposition to a border crossing Downriver. City officials, the business community and my constituents have come forward to express their concerns about the impact a border crossing will certainly have on our community.

I am encouraged that decision makers have already eliminated all Downriver tunnel options from consideration. I am hopeful that the same conclusion will be reached with regards to bridge options, and that all Downriver area options will be eliminated when the list is shortened to practical alternatives in November. I will continue to stand with my community in opposition to a bridge crossing being placed Downriver.

If you have any questions, please do not hesitate to contact me. I appreciate you taking the time to read and consider these comments.

Sincerely,



Hoon-Yung Hopgood
State Representative

HH/jz