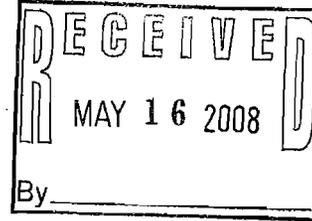




GSA Great Lakes Region

May 13, 2008

Mohammed Alghurabi
Senior Project Manager
Michigan Department of Transportation
Murray D. Van Wagoner Building
425 W. Ottawa Street
P.O. Box 30050
Lansing, MI 48909



Subject: Detroit River International Crossing Study, Draft Environmental Impact Statement

Dear Mr. Alghurabi,

This letter is in response to your letter dated May 1, requesting review comments on the Draft Environmental Impact Statement (DEIS) for the proposed new Michigan-Ontario international crossing. The comments transmitted with this letter are observations from the perspective of the General Services Administration (GSA).

Attached is a copy of Michigan Department of Transportation comment form, "DRIC Draft Environmental Impact Statement and Draft Section 4(f) Evaluation", with GSA's comments inserted. Our comments are primarily concerned with broadening the description of activities at the inspection plaza beyond Customs and Border Protection to include the other federal inspection services who have expressed their interest in this project – U.S. Department of Agriculture, Animal and Plant Health Inspection Service – Veterinary Services, and U.S. Department of Health and Human Services – Food and Drug Administration.

The General Services Administration appreciates having the opportunity to participate in this important project. Please feel free to contact me on (312) 353-1237 if you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "DMelcher", written over a circular scribble.

Donald R. Melcher, Jr.
Project Manager
Office of Border Stations
GSA, Great Lakes Region

Enclosure

U.S. General Services Administration
230 South Dearborn Street
Chicago, IL 60604-1696
www.gsa.gov

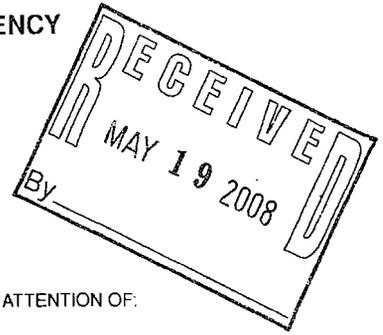
cc: Robert Parsons, MDOT
David Williams, FHWA

<p>“DRIC Draft Environmental Impact Statement and Draft Section 4(f) Evaluation”</p> <p>Michigan Department of Transportation</p>	<p>Reviewer's Comments - Document, dated</p>	<p>Comments By: General Services Administration; May 13, 2008</p>	<p>“Priority” Column:</p> <p>1 – Comment must be addressed.</p> <p>2 – Comment does not constitute a “fatal flaw,” but revisions are needed to improve the completeness of information and readability.</p> <p>3 – Comment represents typographical or grammatical errors.</p> <p>* – Requires discussion</p>
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Page	Paragraph or line number	Comment	Priority	Response (How was the comment addressed?)
Preface				
1	Para. 2	Change, “U.S. Customs” to “U.S. border inspection activities”	2	
Executive Summary				
ES-2	Para. 3	Change, “Customs inspections plaza” to “U.S. border inspection plaza”	2	
ES-3	Para. 1	Change, “Customs processing ” to “U.S. border inspection processing”	2	
		“400 jobs”: Is that CBP alone, or does it include the other federal inspection services?	3	
ES-19	Para. 4	“200 brokers”: Seems to be a high number – the current population at the Cargo Inspection Facility, 2810 W. Fort St., is 18 broker firms, with a total employee population of approximately 50-60 persons over multiple shifts for a 24 hour work day. Electronic transactions have reduced the number of people needed on site.	3	
ES-27	Para. 1-3	Is consideration to physically relocate historic structures a possibility; to relocate displaced residents who desire to remain in Delray, to a “new” neighborhood community?	3	



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



MAY 14 2008

REPLY TO THE ATTENTION OF:

R-19J

Mr. David Williams
Environmental Program Manager
Federal Highway Administration
315 West Allegan Street, Room 201
Lansing, Michigan 48933

Re: Comments on the Draft Environmental Impact Statement (DEIS) for the Detroit River International Crossing (DRIC), Wayne County, Michigan, EIS No. 20080067

Dear Mr. Williams:

I am providing comments on the Draft Environmental Impact Statement (DEIS) for the Detroit River International Crossing (DRIC), consistent with our responsibilities under Section 102(2)(c) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(c), and EPA's authority under Section 309 of the Clean Air Act (CAA), 42 U.S.C. Section 7609.

The purpose of the DRIC is to provide safe, efficient and secure movement of people and goods across the U.S-Canadian border in the Detroit River area to support the economies of Michigan, Ontario, Canada and the United States, and to support the mobility needs of national and civil defense. The DEIS describes four needs:

- (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 in accommodating the flow of people and goods;
- (4) Provide reasonable and secure crossing options in the event of incidents, maintenance, congestion, or other disruptions.

Nine practical Build Alternatives and one No Action Alternative have been evaluated in the DEIS. Each of the build alternatives consists of three elements: (1) an interchange connecting the plaza to the existing highway network, (2) a Customs and Immigration inspection plaza, and (3) a bridge from the plaza that spans the Detroit River into Canada. The Federal Highway Administration (FHWA) and Michigan Department of Transportation (MDOT) have not identified a preferred alternative.

The United States Environmental Protection Agency - Region 5 (EPA) has agreed to work with FHWA and MDOT on this project as a cooperating agency. As such, we have reviewed the

project's purpose and need, the range of alternatives, and methodologies used to evaluate environmental impacts. We previously provided concurrence with these points in July 2007. Through this letter, we are providing our concurrence with the fourth point: results of key environmental studies. We offer our comments below because we believe that FHWA and MDOT can make several important adjustments to the project and its FEIS related to air quality. The comments that we have on air quality are provided in the attached detailed comments. Our detailed comments also discuss opportunities for this project to incorporate energy efficiency in design and operation.

Based on our review of the information provided in the DEIS and the detailed comments we have enclosed on air quality, we have rated the DEIS as "Environmental Concerns-Insufficient Information" (EC-2). The "EC" means that EPA identified environmental impacts that can be reduced in order to attain the fine particulate (PM2.5) National Ambient Air Quality Standard and provide adequate protection for public health. The "2" indicates that additional information needs to be provided in the Final Environmental Impact Statement (FEIS) to alleviate these public health issues. Our rating applies to each of the build alternatives presented in the DEIS. We have enclosed a summary of EPA's rating system under NEPA.

Thank you for the opportunity to comment on this DEIS. We are available to discuss these comments. We are confident that these issues will be addressed and reflected in the forthcoming FEIS. If you have any questions, please contact me. The staff person assigned to this project is Sherry Kamke; she can be reached at (312) 353-5794 or via email at kamke.sherry@epa.gov.

Sincerely,



Bharat Mathur
Acting Regional Administrator

Enclosures (3)

- 1) Detailed Comments
- 2) EPA's Summary of NEPA Rating Definitions and Followup Actions
- 3) DRIC concurrence page for DEIS Technical Reports

cc: Robert Parsons, Michigan Department of Transportation
David Wresinski, Michigan Department of Transportation

Detailed Comments on the Draft Environmental Impact Statement (DEIS) for the Detroit River International Crossing (DRIC)

Air Quality in Detroit

EPA is concerned about major infrastructure projects in the Detroit Metropolitan area because of their potential to adversely impact ambient air quality. EPA has designated Southeast Michigan as a non-attainment area for the fine particulate standard, referred to here as particulate matter 2.5 microns or less (PM_{2.5}). Because of their impact on human health, EPA has emphasized the need to address PM_{2.5} and diesel emissions through various national, regional, and local initiatives. Work is currently underway to develop and implement control programs that will assist in bringing this area into attainment of the health-based PM_{2.5} standard as expeditiously as practicable. Despite implementation of national air pollution control programs, additional local controls will likely be necessary for this area to reach attainment of the National Ambient Air Quality Standard (NAAQS) for PM_{2.5}. Any increase in the emissions in this area is cause for concern and will make the state's task of developing a control strategy for bringing the area into attainment more challenging.

Particulate Matter (PM)

The DRIC raises air quality concerns because large numbers of diesel trucks are associated with the project. The proposed DRIC project must be added to the long-range Regional Transportation Plan to determine if the DRIC will conform to the State Implementation Plan. This transportation conformity test will occur after the Preferred Alternative is identified and will be reported on in the FEIS.

In addition to the regional conformity test, FHWA and MDOT are required to prepare qualitative hot-spot analyses for PM_{2.5} and PM₁₀ for the DRIC alternatives. This is because the project qualifies as a new or expanded project that has a significant number of or significant increase in diesel vehicles (See 40 CFR 93.123 (b)(1)). A microscale or "hot-spot" analysis is designed to evaluate whether there are air quality impacts on a local scale rather than an entire nonattainment or maintenance area. Transportation projects subject to the conformity requirement must not cause new air quality violations, worsen existing violations, or delay attainment of the air quality standards. See Clean Air Act § 176(c) and EPA's implementing regulations at 40 CFR Part 93. The transportation conformity rule requires that projects of air quality concern be assessed qualitatively for local PM impacts.

The required analyses were included in MDOT's technical report entitled "Air Quality Impact Analysis." Since no preferred alternative has been identified as part of the DEIS, MDOT's hot-spot analysis treats all the existing alternatives equally. The analysis should be based on the vehicle activity at the location being analyzed. The DEIS included a discussion about the

increase in traffic during the time frame of the project, but there was limited discussion of the secondary impacts of the project. There should be a more focused discussion about how the project will actually affect traffic levels in specific locations. In addition, there have been numerous air quality studies on particulate matter in Southwest Detroit, Dearborn, and near the bridge corridor in Windsor, Ontario, which the FEIS should summarize. We cannot treat these analyses as complete because the DEIS did not pick a preferred alternative for the DRIC project. At the FEIS stage, a preferred alternative will be selected. At that time, we expect MDOT will be able to focus on that alternative and provide a clearer hot-spot analysis.

Ozone

EPA revised the 8-hour ozone standard on March 12, 2008. EPA expects to make final designations for the new standard in March 2010. New State air quality plans will be required in 2013. The Michigan Department of Environmental Quality will have to include air emissions related to the DRIC projects in the associated state implementation plans.

Mobile Source Air Toxics

The Mobile Source Air Toxics (MSAT) analysis in the DEIS is based on FHWA's "Interim Guidance on Air Toxics Analysis in NEPA Documents." While there are positive elements to this guidance, especially the willingness to acknowledge potential MSAT concerns, EPA continues to believe this guidance is not consistent with current academic literature and other published guidance. As an example, we point to the recent extensive report to the American Association of State Highway and Transportation Officials conducted as part of a National Cooperative Highway Research Program project: "Analyzing, Documenting, and Communicating the Impacts of Mobile Source Air Toxic Emissions in the NEPA Process," March 2007, [http://www.trb.org/NotesDocs/25-25\(18\)_FR.pdf](http://www.trb.org/NotesDocs/25-25(18)_FR.pdf). This document, commissioned by the States' Departments of Transportation, represents current professional practices of air quality experts and identifies air quality tools and approaches that would be appropriate for various NEPA settings and project levels. Although the DEIS conforms to FHWA's Interim Guidance, we continue to believe more could be done to quantify local air impacts, especially where higher concentrations of diesel emissions are expected.

The DEIS provides toxicity information for six MSATs of most concern. EPA agrees with the need to provide this information in the DEIS, but notes that the primary health concern for acrolein is not cancer, but rather respiratory. Similarly, benzene, acetaldehyde, formaldehyde, and 1,3-butadiene all have non-cancer health endpoints of potential concern. We recommend including health endpoints other than cancer for acrolein, benzene, acetaldehyde, formaldehyde, and 1,3-butadiene in the description of toxicological endpoints included in the DEIS. Cancer is not a known health endpoint for acrolein. Therefore, references to potential carcinogenicity for acrolein should be removed (pg 3-87 of the DEIS and pg 4-4 of the DEIS Technical Report).

In addition to those MSATs explicitly discussed in FHWA's interim guidance, both the guidance and DRIC DEIS acknowledge numerous studies providing evidence that populations living near major roadways face adverse health outcomes. Language in both documents notes that FHWA

cannot assess the validity of these studies. However, numerous publications, including those of EPA and the Centers for Disease Control and Prevention (CDC), have reviewed available public health studies of current populations exposed to current levels of traffic-related air pollution. The available reviews conclude that there is consistent evidence across a range of different studies for several health endpoints, including respiratory effects (lung developmental decrements, exacerbation of respiratory symptoms in asthmatics and non-asthmatics, and onset of asthma and allergic disease), cardiovascular disease and mortality, and all-cause mortality in adults (Adar and Kaufman, 2007; Salam et al., 2008; Samet, 2007). In 2004, these studies prompted the American Academy of Pediatrics (AAP), the licensing board for pediatricians, to advise that schools and child care centers be sited away from roads with heavy traffic. Given the proximity of the proposed project to Detroit Public Schools facilities and an early childhood center, these studies and their interpretation by the AAP should be given greater prominence in the FEIS. The studies establish a presumptive public health problem with populations near major transportation infrastructure, and as such, the Environmental Impact Statement should include analysis of a broader range of mitigation options. EPA can provide technical advice and assessments of available mitigation options.

As the FHWA guidance acknowledges, these studies are not specific to MSATs. As such, these studies should be treated separately from MSATs. Available information suggests that a portion of the observed health decrements in populations living near major roads may be attributable to mechanically-generated particles from brake and tire wear, ultrafine particles, or other pollutants not herein defined as MSATs. As an indicator of concern over non-tailpipe and non-evaporative pollutants for the current DEIS, a 2004 study of residents near the Peace Bridge border crossing near Buffalo, New York estimated that in the community around the bridge, hospital discharges for adult asthma increased between 1991 and 1996, while the national hospitalization rate fell (Lwebuga-Mukasa et al., 2004). Given the sharp reductions in motor vehicle emissions that occurred during that time frame, the study highlights concerns that MSAT and other tailpipe and evaporative emission trends are insufficient to explain likely health impacts of the current project.

Mitigation for Air Quality Impacts

Construction - Construction emissions may represent a substantial source of PM_{2.5} emissions in areas that currently have serious air pollution problems, for which it will be challenging to meet the PM_{2.5} Standard. We recommend that MDOT and FHWA do all that can be done to minimize PM_{2.5} emissions from the project, including construction activities.

For this project, construction emissions could be a major component of air emissions. We acknowledge the Air Quality Mitigation information that MDOT included in their Green Sheet Project Mitigation Summary, which is part of the DEIS. We note that the air quality measure is for a construction emissions plan that will include actions such as:

- Retrofitting off-road construction equipment,
- Using ultra-low sulfur fuels for equipment,

- Limiting the age of off-road vehicles used in construction,
- Minimizing engine operations,
- Restricting construction activities around more sensitive receptors,
- Instituting fugitive dust control plans, and
- Using diesel particulate traps and oxidation catalysts.

We recommend that FHWA and MDOT undertake an analysis of construction mitigation options and commit to them to the extent possible.

Operational - General mitigation approaches for anti-idling during operations are only briefly touched upon in the DEIS. We recommend that FHWA and MDOT consider the following measures:

- Routing to reduce truck traffic through residential areas and away from more sensitive receptors,
- Minimizing travel within plazas,
- Implementation of border delay reductions, and
- Implementation of anti-idling strategies at inspection queues.

Research published by EPA investigators suggests that high sound barriers and mature roadside vegetation between people and traffic may significantly reduce downwind concentrations of pollutants emitted along roadways.

We recommend that FHWA and MDOT undertake an analysis of mitigation options for both construction and operations and commit to them to the extent possible, so that an alternative with low environmental impact, both for the region and local communities, can be selected. We are available to participate in discussions on addressing mitigation.

Stormwater

Information included in the DEIS on sedimentation control measures and stormwater management plans sufficiently addresses EPA's scoping comments on stormwater.

Energy Efficiency and Sustainability

Plaza buildings should be designed and operated to minimize energy use and incorporate sustainable architecture where feasible. We recommend the project sponsors evaluate and incorporate such features as green roofs, low-flow plumbing fixtures, permeable pavements, and high-efficiency lighting. Lighting on the bridge and highway links should also be high efficiency. The General Service Administration (GSA) will own the plaza buildings. Under GSA policies, all GSA new construction projects and substantial renovations must be certified through the Leadership in Energy and Environmental Design (LEED) Green Building Rating System of the

U.S. Green Building Council. Projects are encouraged to exceed basic LEED green building certification and achieve the LEED Silver level. Please document in the FEIS how DRIC will implement this GSA policy.

SUMMARY OF RATING DEFINITIONS AND FOLLOW UP ACTION*

Environmental Impact of the Action

LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impacts. EPA would like to work with the lead agency to reduce these impacts.

EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS date, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1-Adequate

The EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collecting is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2-Insufficient Information

The draft EIS does not contain sufficient information for the EPA to fully assess the environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640 Policy and Procedures for the Review of the Federal Actions Impacting the Environment

Interagency Streamlining Agreement for Preparation of the Detroit River International Crossing Environmental Impact Statement

Key Point: Draft Environmental Impact Statement and Draft Section 4(f) Evaluation & All Supporting Technical Reports*

Please check one:

My signature indicates that
U.S. Environmental Protection Agency

Agency Name

has achieved general agreement with the FHWA on the above Key Point.

My signature indicates that

Agency Name

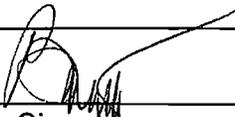
has no statutory authority with regard to this Key Point.

My signature indicates that

Agency Name

has not achieved general agreement with the FHWA on the above Key Point for the following reasons:

Bharat Mathur
Print Name


Signature

5/14/08
Date

* Air Quality Analysis, Induced Demand, Community Inventory, Wetlands-Threatened & Endangered Species-Coastal Zone Management, Brine Well Cavity Investigation, Cultural Analysis – Aboveground, Cultural Analysis – Archaeological, Indirect & Cumulative Impacts Analysis, Noise Study, Initial Site Assessment/Preliminary Site Investigation, Traffic Analysis Level 1: Illustrative Alternatives, Traffic Analysis Level 2 Part 1: Travel Demand Model, Traffic Analysis Level 2 Part 2: Highway Capacity Analysis & Microsimulation Modeling Results, Conceptual Engineering

Project: 18505

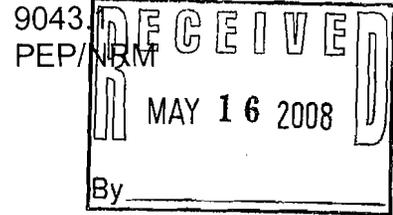


United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240



MAY - 9 2008



ER 08/218

Mr. James J. Steele
Division Administrator
Federal Highway Administration
315 West Allegan Street, Room 201
Lansing, Michigan 48933

Dear Mr. Steele:

As requested, the Department of the Interior (Department) has reviewed the draft Environmental Impact Statement (EIS) and draft Section 4(f) Evaluation for the **Detroit River International Crossing Study, Wayne County, Michigan**. The Department offers the following comments and recommendations for your consideration.

General Comments

The draft EIS provides a comparison between the No Build Alternative and nine Practical (Build) Alternatives crossing the Detroit River at one of three possible locations for a new bridge. A preferred alternative has not been identified. The draft EIS provides an adequate discussion of the consequences to fish and wildlife resources from construction of each of the practical alternatives.

Section 4(f) Evaluation Comments

The draft Section 4(f) Evaluation identified properties in the project study area eligible to be considered under Section 4(f) of the Department of Transportation Act of 1966 (48 U.S.C. 1653(f)). Eight properties, both historic and recreational, were found to be in the project area and at least one of the nine build alternatives will use all or parts of these properties. These properties include the Berwalt Manor Apartment Building, Kovacs Bar, St. Paul African Methodist Episcopal Church, Frank Beard School, the Detroit Savings Bank/George International Building, the South Rademacher Community Recreation Center, the South Rademacher Playground, and the Post-Jefferson Playlot. The Post-Jefferson Playlot appears not to be currently used for recreation and its significance is currently under discussion.

Of the five historic properties that have been determined to be eligible for the National Register of Historic Places, three would be removed under all practical alternatives, varying portions of one historic property would be used under each practical alternative, and one historic site would be removed by only one of the practical alternatives. Of the three recreational properties, all three would be removed by all of the practical alternatives. The evaluation considered other alternatives and the no-action alternative that would have avoided impacts to these properties; however, these were determined not to be prudent alternatives. The draft does not identify a preferred alternative, and consultation with the Michigan State Historic Preservation Officer (SHPO) has not reached a conclusion.

Therefore, the Department concurs with the Federal Highway Administration (FHWA) that there appears to be no feasible or prudent alternative resulting in the loss of eligible Section 4(f) properties. The Department does not concur that all measures to minimize harm to the property have been employed because a preferred alternative has not yet been identified and the Michigan SHPO has yet to concur in determinations of effect; though there is a draft version of a Memorandum of Agreement (MOA) in the document. A copy of the MOA, once executed, should be attached to the final evaluation.

Specific Comments on the Draft EIS

Effects on Wildlife and Wetlands

Section 3.8.1.4, *Wildlife and Migratory Birds*, page 3-107: This section addresses potential effects to migratory birds from the bridge lighting design and indicates that coordination with the Fish and Wildlife Service (FWS) will occur during the design phase. We appreciate the willingness of the FHWA and the Michigan Department of Transportation (MDOT) to work with the FWS on the lighting design to minimize potential avian mortality at a new crossing of Detroit River. In addition to the lighting plan, we recommend that the coordination with the FWS also involve discussion of designs and measures that the transportation agencies might consider to minimize potential avian impacts as they develop and evaluate bridge structure designs (e.g., cable-stay vs. suspension bridge, height of the bridge towers, etc.) to meet the primary design criteria for a new bridge. We recommend that any such coordination be documented in the final EIS.

The Department has a continuing interest in working with the FHWA and the MDOT to ensure impacts to resources of concern to the Department are adequately addressed. For matters related to Section 4(f), please contact Regional Environmental Coordinator Nick Chevance, National Park Service, Midwest Regional Office, 601 Riverfront Drive, Omaha, Nebraska 68102; telephone 402-661-1844. For matters related to fish and wildlife resources, please continue to coordinate with Mr. Craig Czarnecki, Field Supervisor, or Ms. Barbara Hosler, Project Biologist, Ecological Services Field Office, U.S. Fish and Wildlife Service, 2651 Coolidge Road, Suite 101, East Lansing, Michigan 48823-6316, telephone 517-351-2555.

Mr. James J. Steele

3

We appreciate the opportunity to provide these comments.

Sincerely,



for Willie R. Taylor
Director, Office of Environmental
Policy and Compliance

cc:

✓
Mr. David E. Wresinski, Administrator
Project Planning Division
Michigan Department of Transportation
P.O. Box 30050
Lansing, Michigan 48909



United States Department of the Interior

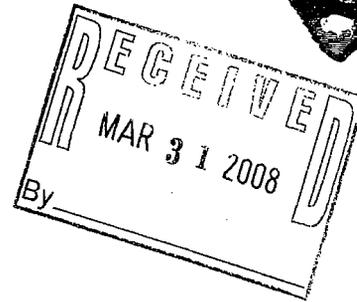
National Park Service

Midwest Region
601 Riverfront Drive
Omaha Nebraska 68102-4226



H30 (MWR-CR/NRHP)

25 MAR 2008



Bob Parsons
Public Involvement and Hearings Officer
Michigan Department of Transportation
425 W. Ottawa Street
P.O. Box 30050
Lansing, MI 48909

Dear Mr. Parsons,

Thank you for the opportunity to review the Draft Environmental Impact Statement (DEIS) for the Detroit River International Crossing Study. Because the National Park Service (NPS) has a long-term programmatic relationship with Historic Fort Wayne through two Federal surplus property programs, the NPS is providing the following comments for your consideration.

Between 1949 and 1976 the Federal government transferred ownership of portions of historic Fort Wayne to the City of Detroit via the Federal Lands to Parks program and the Historic Surplus Property program (formerly known as the Historic Monuments program). These programs require that the NPS approve treatment and use of such historic properties, and to monitor them in perpetuity. The NPS is currently working with the City of Detroit to allow for a greater range of uses of the buildings than is now allowed in order to ensure their long-term preservation. This includes leasing opportunities. The new Master Plan for Fort Wayne, recently approved by the City of Detroit, is closely connected to these efforts. Therefore, in the DEIS, please reference and explain as appropriate the Fort Wayne Master Plan in Section 3, "The Environment." Such discussions might be appropriate on pages 3-43, 3-44, page 3-75, and page 3-125. Please clarify any relationship between the Fort Wayne Master Plan and the Rouge River Gateway Master Plan Trail.

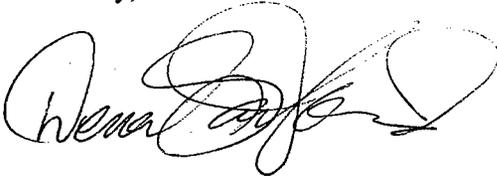
Related to this topic, additional information would be beneficial to broaden the discussion on "Visual Impacts", pages 3-126 to 3-133, and impacts of views from within the neighborhood and from Fort Wayne to the proposed plaza areas. Also, the description of "easier access" to Fort Wayne is not fully explained, given that the primary access via Livernois Avenue would be removed according to the various alternatives. On page 3-75, access to Fort Wayne is described as to be enhanced along Campbell or Junction Streets; as either road is roughly one-half mile or more from intersecting with the primary road north of the fort—Jefferson Avenue—how will the remainder of the access to the Fort be treated?

As an editorial comment, the three "Tiers" graphically presented on page 3-113 regarding above ground resources does not correspond with the description of Tiers 1, 2, and 3 in the December 3, 2007 consultation letter to the Michigan State Historic Preservation Office in Appendix E.



Thank you for the opportunity to participate in the review of this proposal. If you have any questions, please feel free to contact me by telephone at 402-661-1944 or via electronic mail at dena_sanford@nps.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dena Sanford', written in a cursive style.

Dena Sanford
Architectural Historian

cc:

Mr. Brian Conway, State Historic Preservation Officer, Department of History, Arts and Libraries
Michigan Historical Center, 702 W. Kalamazoo St., P.O. Box 30740, Lansing, Michigan 48909-8240

Mr. James Conway, Historic Fort Wayne, 6325 W. Jefferson, Detroit, Michigan 48209

Mr. Don Klima, Advisory Council on Historic Preservation, The Old Post Office Building, Room 809,
1100 Pennsylvania Ave., Washington, D.C. 20004

Mr. Thomas Berlucci, Historic Fort Wayne Coalition, 2024 Crabtree, Troy, Michigan 48083

Mr. Lawrence Hemmingway, Deputy Director, Detroit Recreation Department, NW Activity Center,
18100 Meyers Road, Detroit, Michigan 48235



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



**Detroit Airports District Office
11677 South Wayne Road
Suite 107
Romulus, MI 48174**

May 6, 2008

Bob Parsons, MDOT Public Hearing Officer
Bureau of Transportation Planning
P.O. Box 30050
Lansing, MI 48909

Dear Mr. Parson:

Detroit River International Crossing
Review Comments for draft
Environmental Impact Statement (DEIS)
FHWA-MI-EIS-05-02-D

Irene Porter of the Federal Aviation Administration (FAA) Detroit Airport District Office requested that I provide comments on the DEIS.

In general we have no comments on the draft document. We strongly encourage you to file a FAA form 7460 with the general bridge location and height, so that we can perform any required airspace analysis of the proposed project. This could provide you with valuable information on any potential airspace impacts. There is no cost for this analysis and the data can be submitted to our web site <https://oeaaa.faa.gov/oeaaa/external/portal.jsp>. This analysis will also provide information on what type of marking and lighting will be required for the project. General information on marking and lighting is contained in FAA Advisory Circular 70/7460-1K "*Obstruction Marking and Lighting*".

If you have any additional questions please contact me at (734) 229-2905.

Sincerely,

Ernest P. Gubry
Environmental Protection Specialist
Detroit Airports District Office



U.S. Department of Housing and Urban Development

Detroit Field Office
Office of the Director
Patrick V. McNamara Federal Building
477 Michigan Avenue, Room 1710
Detroit, MI 48226-2592
Tel. (313) 226-7900 FAX (313) 226-5611

May 2, 2008

Mr. David W. Wresinski, Administrator
Project Planning Division
Bureau of Transportation Planning
Murray D. Van Wagoner Building
P.O. Box 30050
Lansing, MI 48909



Dear Mr. Wresinski:

Re: Draft Environmental Impact Statement (EIS)
Detroit River International Crossing
Wayne County, Michigan
FHWA-MI-EIS-05-02-D

Thank you for the opportunity to comment on the Detroit River International Crossing (DRIC) Draft Environmental Impact Statement (EIS). The Department of Housing and Urban Development (HUD), Detroit Field Office, has reviewed the proposed design and route alternatives for DRIC. We have the following comments.

Based on the information provided, we are concerned about possible impacts on HUD funded activities along the proposed design and route. We have identified City of Detroit initiated actions 1992 up to date such as identifying and removing blighted conditions, relocating affected households and businesses, encouraging private investment, redeveloping cleared sites, and creating new opportunities for residents. These activities (Cluster 5 and small part of Cluster 4) fall into HUD Community Development Block Grant (CDBG), HOME, Section 108 and Economic Development Initiative (EDI) Grants up to **\$44,231,828.92**. Enclosed please find the City of Detroit expenditures for HUD funded activities for the DRIC Study Area (Cluster 5 and small part of Cluster 4).

There may be additional activities in the area funded through other entities under HUD programs that are as yet unidentified.

We believe it is necessary to have a more thorough understanding of the Demolition and Relocation Plans to appreciate the potential impacts to HUD funded activities within the area. Certain HUD assisted activities, even if owned by other governmental or private entities carry restrictions on disposition, reuse, or continuity of use. Prior approval of demolition or relocation may be required.

In summation, based on our review and in accordance with HUD policy, a specific mitigation plan should be developed to ensure that appropriate consideration be given to any such use restrictions and that compensation is provided if required by HUD program regulations. Should you have any questions concerning this letter, please contact Carmen Reverón, Field Environmental Officer, at (313) 226-7900, Ext. 8194. Also, feel free to contact me directly with regard to this or other matters that may be of mutual interest or concerns. I can be reached at (313) 226-7900, Ext. 8146.

Sincerely,

A handwritten signature in cursive script that reads "Lana Vacha". The signature is written in black ink and is positioned below the word "Sincerely,".

Lana Vacha, Director
Detroit Field Office

Enclosure:

HUD expenditures for funded activities for the Detroit River International Crossing Study Area (Cluster 5 and a small part of Cluster 4)

CDBG 2000 – to date

NAME OF ORGANIZATION	EXPENDITURE
Abayomi CDC	\$ 208,023.47
Alpha Kappa Alpha	\$ 22,799.29
Alternatives for Girls	\$ 851,222.92
Alzheimers Association	\$ 163,105.00
Bagley Housing	\$1,177,106.78
Bridging Communities	\$ 271,642.33
City Year	\$ 73,450.00
Clark Park	\$ 72,748.21
Covenant House	\$ 329,708.08
Delray United Action Council	\$ 187,021.90
Detroit Inner City Drill Team	\$ 17,799.87
Freedom House	\$ 189,089.23
Goodwill Industries	\$ 124,142.90
Greening of Detroit	\$ 212,363.19
Hubbard Richard Neibhd. Strategy Area	\$ 342,906.27
International Institute	\$ 46,611.00
Joy-Southfield Development Corp.	\$ 2,653.93
LASED	\$ 364,068.27
Lead Program - 2yrs.	\$ 104,023.00
Life Directions	\$ 97,107.87
Living Arts	\$ 39,536.69
Matrix Theatre Company	\$ 34,884.37
Matrix Walter/Mary Ruether Senior Cntr.	\$ 73,971.13
Mexicantown CDC	\$ 839,212.79
Neighborhood Centers Inc.	\$ 347,130.24
Peoples Community Services	\$ 402,427.88
Senior Home Repair Program 05-06	\$ 330,930.00
Senior Home Repair Program 06-07	\$ 287,066.00
Southwest Counseling & Development	\$ 47,202.34
Southwest Detroit Business Assoc.	\$ 972,768.86
Southwest Detroit Community Recreation Cntr.	\$ 29,581.75
Southwest Detroit Environmental Vision	\$ 96,962.01
Southwest Housing Corporation	\$ 494,582.00
Southwest Zone Community Policing	\$ 125,000.00
United Generation Council	\$ 25,019.82
Young Detroit Builders Youthbuild	\$ 362,668.74
Demolition – 05-07	\$ <u>1,075,000.00</u>
TOTAL:	\$ 10,368,789.92

HOME – since 1992

ADDRESS	EXPENDITURE
388 W. Grand Blvd.	\$ 800,000
250 W. Grand Blvd.	\$ 753,699
3615 W. Vernor	\$ 2,225,000
1185 Clark Street	\$ 2,000,000
8715 W. Vernor	\$ 1,829,900
1930 Cabot	\$ 2,000,000
1324-36 Porter	\$ 1,009,955
9200 W. Vernor	\$ 3,689,250
4108 31st street	\$ 4,784,446
1250 18th street	\$ 398,295
275 W. Grand Blvd.	\$ 2,000,000
Bagley Housing Homebuyer Program	<u>\$ 5,344,323</u>
TOTAL	\$26,834,868

SECTION 108 LOANS/EDI GRANTS

NAME OF ORGANIZATION	EXPENDITURE
Mexicantown	\$ 4,647,510 -- 2002
	\$ 250,000 -- EDI 2002
West Vernor/Lawndale	\$1,530,661 -- 2002
West Vernor/Lawndale	<u>\$ 600,000</u> -- EDI 2002
TOTAL	\$7,028,171
GRAND TOTAL:	\$ 44,231,828.92



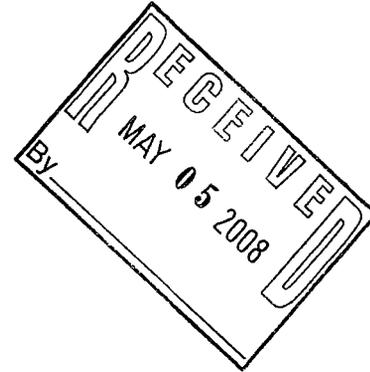
STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING



JENNIFER M. GRANHOLM
GOVERNOR

STEVEN E. CHESTER
DIRECTOR

April 29, 2008



Mr. David E. Wresinski, Administrator
Project Planning Division
Michigan Department of Transportation
P.O. Box 30050
Lansing, Michigan 48909

Dear Mr. Wresinski:

**SUBJECT: Draft Environmental Impact Statement (DEIS)
Detroit River International Crossing Study (DRIC), Wayne County, Michigan**

The Michigan Department of Environmental Quality (MDEQ), Land and Water Management Division (LWMD), has completed its review of the DEIS for the Detroit River International Crossing Study (DRIC), Wayne County Michigan. The DEIS discusses proposed impacts in Michigan. Other divisions within MDEQ may provide a separate response.

The purpose of the proposed 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 United States.
- Support the mobility needs of national and civil defense to protect the homeland.

The project needs include:

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

Nine practical build alternatives and the no-build alternative have been identified. The build alternatives consist of three elements:

- One of three bridge alternatives that will fully span the Detroit River. These alternatives are X-11, X-10A, and X-10B.
- A new plaza consisting of approximately 150 acres.
- A new interchange to connect the plaza to the existing highway network.

Potential relocations range from 324 to 414 residences and up to 56 businesses, as well as other facilities.

The LWMD has the following comments:

1. The DEIS indicates that only 0.01 acres of wetlands will be impacted by the three bridge alternatives. A permit for these minor impacts will be required from LWMD, under Part 303, Wetlands Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA). The mitigation ratio for these impacts would be 1:1.
2. The bridge crossing over the Detroit River will require a permit under Part 301, Inland Lakes and Streams, and Part 31, Water Resources Protection, of the NREPA. Only minimal impacts are expected, as the proposed bridge will completely span the Detroit River. Proper storm water runoff controls should be implemented to ensure that there is no direct runoff from the bridge into the Detroit River.
3. LWMD staff reviews 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. 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, no adverse impacts to coastal resources are anticipated. Upon issuance of all necessary permits, this project will be consistent with MCMP.
4. We concur with the alternatives to be carried forward in the DEIS.

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. David Williams, U.S. Federal Highway Administration
Ms. Sherry Kamke, U.S. Environmental Protection Agency
Mr. Craig Czarnecki, U.S. Fish and Wildlife Service
Mr. John Konik, U.S. Army Corps of Engineers
Mr. Andrew Hartz, MDEQ
Mr. Alex Sanchez, MDEQ

From: Steven Hoin
To: Mohammed Alghurabi; Bob Parsons
Date: 5/28/2008 8:52:17AM
Subject: Re: DRIC Draft Environmental Impact Statement - Comments

Date: May 28, 2008

TO: Bob Parsons
Public Involvement and Hearings Officer
Michigan Dept. of Transportation
Lansing, MI

FROM: Patricia Thornton and Steve Hoin
Geologists/Project Managers
Michigan Dept. of Environmental Quality
Remediation & Redevelopment Division
Warren, MI

SUBJECT: DRIC Study- comments on Draft EIS
Section 3.13 Contaminated Sites

The following comments are in addition to the comments provided by Patricia Thornton on February 13, 2008. Note: these comments are from the Michigan Department of Environmental Quality's Remediation and Redevelopment Division. Other Divisions have provided separate comment.

Ms. Thornton's comments are reiterated in their entirety following.

The terms "Initial Site Assessment" and "Preliminary Site Investigation" should be changed to reflect current language practices, which are in accordance with American Society of Testing & Materials (ASTM) Practice E-1527-00. The common practice is that the former (ISA) is referred to as the Phase I Environmental Site Assessment (ESA), which is the practice of a search of all common resources to identify potential recognized environmental conditions (REC's) from historical operations. The latter (PSI) is commonly referred to as the Phase II ESA, which is the investigation phase to determine if a site is contaminated above the appropriate clean-up criteria

The use of the word "pollutants" should be changed to accurately reflect contamination, e.g., "contaminant"

Table 3-27 indicates SID No. 90 that Minergy Detroit, LLC owns the property at 7819 W. Jefferson when the property should be listed under current owner Detroit Economic Growth Corporation, formerly Allied Signal, aka Detroit Coke.

One potential addition to this list (MI Contaminated Sites) would be "Waterfront Terminal Holdings, LLC at 5431 W. Jefferson, which is just to the east of the X-11 crossing.

The use of MI Contaminated Sites could be changed to more actively reflect the rules, e.g. "Part 201 Listed site"

It should be noted that if any of the sites are "facilities" as defined in Section 20101 of the Natural Resources and Environmental Protection Act, 1994, PA 451, as amended (NREPA), (where there has been a release of a hazardous substance(s) in excess of the Part 201 residential criteria), that those properties would be regulated under Section 20107a of Part 201, Environmental Remediation of the NREPA. If such facilities are acquired, Section 20107a specifically requires that owners and operators take due care measures to ensure existing contamination on a property does not cause unacceptable risks and is not exacerbated. Such measures which could be mentioned in the DEIS would include evaluating the contamination and taking necessary response actions. Due care requirements are not

related to the owner or operators liability for the contaminants: they apply to non-labile parties and liable parties alike. The due care requirements were designed so contaminated properties can be safely redeveloped. Perhaps some of the above language could be incorporated into the text in the paragraph starting with "twenty-four sites". For additional information on due care, follow the link http://www.michigan.gov/deq/0,1607,7-135-3311_4109_4212---,00.html.

Additional Comments

It is possible that bridge footings will be placed at or near a former Detroit Gas Company Station. Recent information has revealed that this former Station is located on the Northwest corner of the Yellow Freight property and that soils and groundwater are likely heavily contaminated. This site should be added to Table 3-27.

Michigan environmental regulations require that activities on sites of environmental contamination do not impede the on-going response actions nor exacerbate existing environmental conditions (i.e., increase costs). This is required as part of Due Care obligations as mentioned earlier. The installation of bridge footings to bedrock on the former Detroit Coke site could allow for the migration of contaminated groundwater to bedrock or potentially laterally to the River. This possibility needs to be taken into consideration during the design and construction process.

Interim response measures such as capture trenches are presently operating on the former Detroit Coke site. These features may be harmed or destroyed during bridge construction. These features will need remain and will likely need to be operated for an extended period of time (decades) unless more aggressive remedial measures are taken. Also, additional remedial measures in the form of extraction wells and possible additional capture trenches are expected in the near future. The area beneath the bridge needs to remain accessible in order to complete these remedial measures and to operate the system.

Please be advised that the City of Detroit Water and Sewer Department has requested a permit (copy attached) to construct an additional tunnel to increase their discharge capacity from their waste water treatment plant. The tunnel extends into the Detroit River. That tunnel terminates beneath the River at a location very near the X-10B and X-10A crossings.

Please do not hesitate to call either of us with any questions.

Steven J. Hoin, CPG
Senior Geologist, MDEQ RRD
Southeast Michigan District Office
27700 Donald Court
Warren, MI 48092

>>> Mohammed Alghurabi May 5, 2008 4:10 PM >>>
Good afternoon,

As a follow-up to an earlier e-mail announcing availability of the Draft Environmental Impact Statement (DEIS) for the Detroit River International Crossing (DRIC) Study, I would like to share that the **Michigan Department of Transportation (MDOT)** and the **Federal Highway Administration (FHWA)** have **extended the public comment period for the DRIC DEIS by 30 days.** The comment period will now

end on Monday, May 29, 2008, to give agencies, the public and community groups more time to submit comments on the DEIS. The press release and a flyer announcing the comment period extension is attached; Spanish and Arabic versions will be available shortly and forwarded as soon as possible.

Comments may be e-mailed, faxed, or postmarked on or before May 29, 2008, to the Michigan Department of Transportation, c/o Bob Parsons (Public Involvement and Hearings Officer), 425 W. Ottawa Street, P.O. Box 30050, Lansing, MI 48909; fax (517) 373-9255; e-mail: parsonsb@michigan.gov. A comment form is attached for your use as needed, please feel free to distribute freely.

Copies of the DEIS and supporting materials, including a Spanish version of the Executive Summary, remain available for review at the following locations:

MDOT Bureau of Transportation Planning, 425 Ottawa St., Lansing
MDOT Metro Region Office, 18101 W. Nine Mile Rd., Southfield
MDOT Detroit Transportation Service Center, 1400 Howard St., Detroit
MDOT Taylor Transportation Service Center, 25185 Goddard, Taylor
Henry Ford Centennial Library, 16301 Michigan Ave., Detroit
Detroit Public Library, 5201 Woodward Ave., Detroit
Bowen Branch of the Detroit Public Library, 3648 W. Vernor, Detroit
Library at Southwestern High School, 6921 W. Fort St., Detroit
Delray Recreation Center, 420 Leigh St., Detroit
Allen Park Library, 8100 Allen Rd., Allen Park
Ecorse Library, 4184 W. Jefferson Ave., Ecorse
Melvindale Library, 18650 Allen Rd., Melvindale
River Rouge Library, 221 Burke St., River Rouge
Kemeny Recreation Center, 2260 S. Fort St., Detroit
Campbell Brand Library, 8733 W. Vernor Hwy., Detroit
Neighborhood City Hall Central District, 2 Woodward Ave., Detroit
Neighborhood City Hall Northwestern District, 19180 Grand River Ave., Detroit
Neighborhood City Hall Northeastern District, 2328 E. Seven Mile Rd., Detroit
Neighborhood City Hall Western District, 18100 Meyers Road, Detroit
Neighborhood City Hall Eastern District, 7737 Kercheval St., Detroit
Neighborhood City Hall Southwestern District, 7744 W. Vernor St., Detroit

The DEIS, supporting materials, and Spanish version of the Executive Summary also can be viewed and commented on via the Internet at www.partnershipborderstudy.com/reports_us.asp. A copy of the complete transcript, including all comments received, will be available for public review in June at these same locations. For copies of the DEIS or to request alternative formats, such as large print or audio tape, please call (517) 373-9534.

As always, please let me know if you have any questions or need additional information.

Sincerely,

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



CC: Oladipo Oyinsan; Patricia Thornton; Paul Owens; Steven Hoin

Steve - FYI

State of Michigan
Department of Environmental Quality

RECEIVED

Land and Water Management Division
27700 Donald Court
Warren MI, 48092-2793
586-753-3700

FEB 14 2008

REMEDICATION & REDEVELOPMENT DIVISION
SOUTHEAST MICHIGAN DISTRICT OFFICE

File No. 07-82-0188-P

Date: February 12, 2008

PUBLIC NOTICE

Detroit Water and Sewerage Department, Gary Fujita, P.E., 735 Randolph, 5th Floor, Detroit, Michigan 48226, has applied to this office for a permit under authority of Part 301, Inland Lakes and Streams, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. The applicant proposes to modify the Wastewater Treatment Plant's Detroit River Outfall No. 2, and the stop longs on the existing Rouge River outfall, west of Jefferson Avenue. A 6,300 foot long by 21.5 foot diameter tunnel will be constructed from an entrance shaft at the corner of W. Jefferson Avenue and Brennan Avenue, under the Detroit Marine Terminal site, and Zug Island, to offshore in the Detroit River. The tunnel will be bored through rock, 160 feet below the ground surface. Connecting tunnels will be constructed between the new tunnel and existing access shafts on the DMT site and Zug Island, and the six diffuser outfall shafts in the Detroit River. The modifications will allow the treatment plant to discharge 1700 million gallons per day, and eliminate the discharge of non-disinfected waste during wet weather flows. The project is located in T2S, R11E, Section 32, City of Detroit, Wayne County, Michigan, in accordance with plans attached to this notice.

THIS NOTICE IS NOT A PERMIT

The proposed project may also be regulated by one or more additional parts of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, that are administered by the Land and Water Management Division (LWMD). The requirements of applicable parts are considered in determining if it is in the public interest to issue a permit.

When a permit application is received requesting authorization to work in or over the inland waters of the State of Michigan, pursuant to PART 301, INLAND LAKES AND STREAMS, OF THE NATURAL RESOURCES AND ENVIRONMENTAL PROTECTION ACT, 1994 PA 451, AS AMENDED, the Act provides that the department submit copies for review to the department of public health, the city, village or township, and the county where the project is to be located, the local soil conservation district, any local watershed council organized under Part 311, and the local port commission. Additional notification is provided to certain persons as required by statute or determined by the department.

Those persons wanting to make comments on the proposed project shall furnish this office with their written comments no later than 20 days from the date of this notice. Written comments will be made part of the record and should reference the above file number. Objections must be factual, specific, and fully describe the reasons upon which any objection is founded. Unless a written request is filed with the department within the 20-day public comment period, the department may make a decision on the application without a public hearing. The determination as to whether a permit will be issued or a public hearing held will be based on evaluation of all relevant factors defined in Sections 30106 and 30311, or permit criteria defined by other appropriate Parts of the NREPA. These Sections address the effect of the proposed work on the public trust or interest including navigation, fish, wildlife, and water quality among other criteria. Public comments received will also be considered.

cc: ✓ DEQ, RRD, Sites 82-36, 148, 1423
DNR, Wildlife, Southfield
Wayne Co. Clerk
Wayne Co. Drain Comm.
Detroit Water and Sewerage Dept., applicant
US Steel
Parsons Brinckerhoff Michigan, Inc.

DNR, Fisheries, Southfield
Wayne Co. Health Dept.
City of Detroit Clerk
Wayne Soil Conservation Dist.
History Division
USACE
see file for adjacent property owners



AGENCY USE	Previous USACE Permit or File Number	Date Received DEC 14 2007	Land and Water Management Division, MDEQ File Number 07-83-0188-P	AGENCY USE
	USACE File Number		Marina Operating Permit Number	
	<i>Warren Andy Hartz</i>		Fee received \$ 2,000 <i>OK</i> 1030903	

• Complete all items in Sections 1 through 9 and those items in sections 10 through 21 that apply to the project. Clear drawings and cross sections must be provided.

1 PROJECT LOCATION INFORMATION

• Refer to your property's legal description for the Township, Range, and Section information, and your property tax bill for your Property Tax Identification Number(s).

Address 9300 W. Jefferson Ave., Detroit, Michigan 48209		Township Name(s) N/A	Township(s) T2S	Range(s) R11E	Section(s) 32
City/Village Detroit		County(ies) Wayne			
Name of Waterbody Detroit River & Rouge River		Project Name or Job Number Modified Detroit River Outfall No. 2 (MOD DRO-2)	Subdivision/Plat N/A	Lot Number N/A	Private Claim N/A
Project types (check all that apply)					
<input type="checkbox"/> private <input checked="" type="checkbox"/> public/government <input type="checkbox"/> industrial <input type="checkbox"/> commercial <input type="checkbox"/> multi-family <input type="checkbox"/> building addition <input type="checkbox"/> new building or structure <input type="checkbox"/> building renovation or restoration <input type="checkbox"/> river restoration <input type="checkbox"/> single-family <input type="checkbox"/> other (explain)					
The proposed project is on, within, or involves (check all that apply)					
<input type="checkbox"/> a stream <input type="checkbox"/> a pond (less than 5 acres) <input checked="" type="checkbox"/> a Great Lake or Section 10 Waters <input type="checkbox"/> a natural river <input type="checkbox"/> a new marina <input checked="" type="checkbox"/> a river <input type="checkbox"/> a channel/canal <input type="checkbox"/> a designated high risk erosion area <input type="checkbox"/> a dam <input type="checkbox"/> a structure removal <input type="checkbox"/> a ditch or drain <input type="checkbox"/> an inland lake (5 acres or more) <input type="checkbox"/> a designated critical dune area <input type="checkbox"/> a wetland <input checked="" type="checkbox"/> a utility crossing <input type="checkbox"/> a floodway area <input checked="" type="checkbox"/> a 100-year floodplain <input type="checkbox"/> a designated environmental area <input checked="" type="checkbox"/> 500 feet of an existing waterbody					

2 DESCRIBE PROPOSED PROJECT AND ASSOCIATED ACTIVITIES, AND THE CONSTRUCTION SEQUENCE AND METHODS

• Attach separate sheets, as needed, including necessary drawings, sketches, photographs, aeriels, or plans.

The Project is located at the Detroit Water and Sewerage Department (DWSD) Wastewater Treatment Plant, 9300 W. Jefferson Ave., in Detroit. The Project includes the construction of a 21.5 ft diameter tunnel heading easterly from an entrance shaft at the corner of W. Jefferson Ave. and Brennan Ave., under the Detroit Marine Terminal (DMT) site and Zug Island to offshore in the Detroit River. The tunnel is approximately 160 ft below the surface and 6300 ft long. In addition, short connecting tunnels will be constructed between the new tunnel and the existing access shaft on the DMT site and Zug Island, and the six diffuser outfall shafts in the Detroit River. The outfall for the tunnel will require construction work just offshore from Zug Island in the Detroit River in order to connect the new tunnel to the six existing diffuser outfall shafts. In addition, the stop logs on the existing Rouge River outfall will need to be modified. These stop logs are located just west of Jefferson Ave. Sheet 1 of 6 of the attached drawings show the general site plan. Sheets 2-6 of 6 include the construction drawings.

3 APPLICANT, AGENT/CONTRACTOR, AND PROPERTY OWNER INFORMATION

• The applicant can be either the property owner or the person or company that proposes to undertake the activity.
 • If the applicant is a corporation, both the corporation and its owner must provide a written document authorizing the agent/contractor to act on their behalf.

Applicant (individual or corporate name) Gary Fujita, P.E., Deputy Director Detroit Water and Sewerage Department		Agent/Contractor (firm name and contact person) Parsons Brinckerhoff Michigan, Inc. Contact Person: William Hansmire, Ph.D., P.E.	
Mailing Address 735 Randolph, 5th Floor		Address 500 Griswold St., Suite 2900	
City Detroit State MI Zip Code 48226		City Detroit State MI Zip Code 48226	
Daytime Phone Number with Area Code Cell Phone Number 313-224-4787 - -		Daytime Phone Number with Area Code Cell Phone Number 313-963-3912 313-930-2301	
Fax 313-224-6067 E-mail fujita@dwsd.org		Fax 313-963-6910 E-mail hansmire@pbworld.com	
Is the applicant the sole owner of all property on which this project is to be constructed and all property involved or impacted by this project? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes If No, provide a letter signed by the property owner authorizing the agent/contractor to act on his or her behalf or a copy of easements or right-of-ways. If multiple owners, attach all property owners' names, mailing addresses, and telephone numbers. Disclose any DEQ conservation easements or other easements, deed restrictions, leases, or any other encumbrance upon the property in the project area. A copy of the land restriction must be provided.			
Property Owner's Name (If different from applicant) United States Steel Corporation; Contact Person: Steve S. Davidock		Mailing Address Great Lakes Works No. 1 Quality Drive	
Daytime Phone Number with Area Code Cell Phone Number 313-749-3448 - -		City State Zip Code Ecorse MI 48229	



issuance of a permit.

- All applicants must complete all of the items in Sections 1 through 9 on pages 1 and 2 of this application.
- Complete those items in Sections 10 through 21 that apply to the project. Submit only those pages where you have provided information.
- Your application will not be processed if the application form is not completely filled out.
- List here the application page numbers being submitted and a brief description of other attachments included with your application. *Pages 1, 2, 3, 5, 6 and 7 are included. Inapplicable application pages ~~4 and 8~~ are not included. Attachments are as follows: 1) General Site Plan (Sheet 1 of 6); 2) Tunnel Plan and Profile (Sheets 2 & 3 of 6); 3) Work Area at DMT Site & Zug Island (Sheet 4 of 6); 4) Diffuser Riser Shafts Assumed Construction Method (Sheet 5 of 6); 5) Stop Log SI-8 Modifications - Plan and Section (Sheet 6 of 6); 6) Copy of Agreement between City of Detroit and National Steel Corporation for the Construction of Facilities on Zug Island; and, 7) Check for required fee. Four copies of the drawings are submitted on 11"x17", and one copy on 8.5"x11".*
- Submit 8.5" by 11," 8.5" by 14" or 11" by 17" size drawings with 4 copies. The USACE requires one set of drawings on 8.5" x 11" paper, with all notations clearly legible. Larger copies may be submitted in addition to the standard size copies.
- A letter of authorization from the owner must be included if not signed below by the owner.

4 will 12/12/07

<input checked="" type="checkbox"/> Property Owner <input type="checkbox"/> Agent/Contractor <input type="checkbox"/> Corporation - Title	Printed Name <i>Gary Fujita</i>	Signature 	Date (M/D/Y) <i>12/12/2007</i>
---	------------------------------------	---	-----------------------------------

DEC 14 2007



10 Continued - PROJECTS IMPACTING WETLANDS OR FLOODPLAINS OR LOCATED ON AN INLAND LAKE OR STREAM OR A GREAT LAKE

J. INTAKE PIPES (See Sample Drawing 16) OUTLET PIPES (See Sample Drawing 22)

Type headwall end section pipe other *Existing Diffuser Riser Pipes* If outlet pipe, discharge is to wetland inland lake stream, drain, or river Great Lake other

Dimensions of headwall OR end section (ft) length *N/A* width depth Number of pipes *6 riser pipes* Pipe diameters and invert elevations *10 ft; 533.18*

K. MOORING AND NAVIGATION BUOYS (No Sample Drawing available)

- Provide an overall site plan showing the distances between each buoy, distances from the shore to each buoy, and depth of water at each buoy in feet.
- Provide cross-section drawing(s) showing anchoring system(s) and dimensions.

Number of buoys Type of anchor system Purpose of buoy mooring navigation swimming

Dimensions of buoys (ft) width height Do you own the property along the shoreline? No Yes If No, you must provide an authorization letter from the property owner(s)

L. GROINS (No Sample Drawing available)

- Provide an overall site plan showing the distances (ft) of the outermost groins from the property lines, distances between groins, length and width of each groin, and the distance from the existing toe of the bluff to the lakeward end of the groins.
- If existing groins are located on adjacent properties, provide distances (ft) from closest neighboring groin to your property lines on the site plan.
- Provide cross-section views showing the length and height of each groin and the height of groin ends above the observed water level (date and time). If step down type, show the height of each section above the observed water level.

Number of groins Type of groin steel wood other Will groin be placed on a foundation? No Yes (If Yes, dimensions of foundation (ft) length width height

M. FENCES IN WETLANDS, STREAMS, OR FLOODPLAINS (No Sample Drawing available)

- Provide an overall site plan showing the proposed fencing through wetlands, streams, or floodplains.
- Provide drawing of fence profile showing the design, dimension, post spacing, board spacing, and distance from ground to bottom of fence (if in a floodplain).

(check all that apply) wetlands streams floodplains Total length (ft) of fence through wetlands streams floodplains Fence height (ft) Fence type and material

N. OTHER - e.g., structure removal, marine railway, low sand trap wall, breakwater, and structural foundations in wetlands or floodplains

11 EXPANSION OF AN EXISTING OR CONSTRUCTION OF A NEW LAKE OR POND (See Sample Drawings 4 and 15)

Which best describes your proposed waterbody use (check all that apply)

wildlife stormwater retention basin stormwater detention basin recreation wastewater basin other

Water source for lake/pond

groundwater natural springs Inland Lake or Stream stormwater runoff pump sewage other

Location Of the lake/basin/pond floodplain wetland upland

Will project involve construction of a dam, dike, outlet control structure, or spillway? No Yes (If Yes, complete Section 17)

12 ACTIVITIES THAT MAY IMPACT WETLANDS (See Sample Drawings 8 & 9)

- For information on the MDEQ's Wetland Assessment Program, visit the LWMD website or call 517-373-1170.

(check all that apply) fill (Section 10A) dredge or excavation (Section 10B) boardwalk or deck (Section 10I) dewatering fences (Section 10M) bridges and culverts (Section 14) draining surface water other

Has a professional wetland delineation been conducted for this parcel? No Yes (If Yes, provide a copy; if federal method was used, supply data sheets) Applicant purchased property before OR after October 1, 1980

Is there a recorded DEQ easement on the property? No Yes (If Yes, provide the number)

Has the MDEQ conducted a wetland assessment for this parcel? No Yes (If Yes, provide a copy)

Describe the wetland impacts, proposed use or development, and efforts to avoid/minimize impacts. Describe the wetland alternatives and provide the type and amount of mitigation proposed if more than 1/3 acre is to be impacted.

Is any grading or mechanized land clearing proposed? No Yes (If Yes, show locations on site plan) Has any of the proposed grading or mechanized land clearing been completed? No Yes (If Yes, label and show locations on site plan)

- Complete the wetland dredge and wetland fill dimension information for each impacted wetland area.
- Attach additional sheets if necessary and label the impacted wetland areas on a site plan drawn to scale. Attach at least one typical cross-section for each wetland dredge and/or fill area. Also complete Section 10A for fill and Section 10B for dredge or excavation activities.
- If dredge material will be disposed of on site, show the location on site plan in an upland area and include soil erosion and sedimentation control measures.

Wetland dredge dimensions	maximum length (ft)	maximum width (ft)	dredge area <input type="checkbox"/> acres <input type="checkbox"/> sq ft	average depth (ft)	dredge volume (cu yd)
Wetland fill dimensions	maximum length (ft)	maximum width (ft)	fill area <input type="checkbox"/> acres <input type="checkbox"/> sq ft	average depth (ft)	fill volume (cu yd)
Total wetland dredge area <input type="checkbox"/> acres <input type="checkbox"/> sq ft	Total wetland dredge volume (cu yd)				
Total wetland fill area <input type="checkbox"/> acres <input type="checkbox"/> sq ft	Total wetland fill volume (cu yd)				

The proposed project will be serviced by public sewer private septic system (If septic system, show existing and new or expanded system on plans) If septic system, has application been made to the County Health Department for a permit? No Yes If Yes, has permit been issued? No Yes (If Yes, provide a copy)



16 DRAWDOWN OF AN IMPOUNDMENT

- If wetlands will be impacted, also complete Section 12.

Type of drawdown over winter temporary one-time event annual event permanent (dam removal) other

Reason for drawdown

Has there been a previous drawdown? No Yes (If Yes, provide date (M/D/Y) / / Previous MDEQ permit number, if known

Does waterbody have established legal lake level? No Yes Not Sure Dam ID Number, if known

Extent of vertical drawdown (ft)	Impoundment design head (ft)	Number of adjacent or impacted property owners
Date drawdown would start (M/D/Y) / /	Date drawdown would stop (M/D/Y) / /	Rate of drawdown (ft/day)
Date refilling would start (M/D/Y) / /	Date refill would end (M/D/Y) / /	Rate of refill (ft/day)
Type of outlet discharge structure to be used <input type="checkbox"/> surface <input type="checkbox"/> bottom <input type="checkbox"/> mid-depth	Impoundment area at normal water level (acres)	Sediment depth behind impoundment discharge structure (ft)

17 DAM, EMBANKMENT, DIKE, SPILLWAY, OR CONTROL STRUCTURE ACTIVITIES (See Sample Drawing 15)

- If wetlands will be impacted, also complete Section 12.
- Attach site-specific conceptual plans for construction of a new dam, reconstruction of a failed dam, or enlargement of an existing dam for resource impact review. Detailed engineering plans are required once the activity has been determined to be permissible from an environmental standpoint.
- Attach detailed engineering plans for a dam repair, dam alteration, dam abandonment, or dam removal.

Which one best describes your project? new dam construction reconstruction of a failed dam enlargement of an existing dam
 dam repair dam alteration dam abandonment dam removal other

Dam ID Number if known	Type of outlet discharge structure <input type="checkbox"/> surface <input type="checkbox"/> bottom <input type="checkbox"/> mid depth	Will proposed activities require a drawdown of the waterbody to complete the work? <input type="checkbox"/> No <input type="checkbox"/> Yes (If Yes, also complete Section 16)	
Riprap Volume (cu yd)	Dredging/excavation Volume (cu yd)	Fill volume (cu yd)	Does structure allow complete drainage of waterbody? <input type="checkbox"/> No <input type="checkbox"/> Yes
Benchmark elevation (ft)	Datum used <input type="checkbox"/> Local <input type="checkbox"/> NGVD 29 <input type="checkbox"/> other	Describe benchmark and show on plans	

Have you engaged the services of a Licensed Professional Engineer? No Yes (If Yes, name, registration number, and mailing address)

Will a water diversion during construction be required? No Yes (If Yes, describe how the stream flow will be controlled through the dam construction area during the proposed project activities)

The following additional information is required for a new dam, reconstruction of a failed dam, or enlargement of an existing dam.

Describe the type of dam and how you will design the dam and embankment to control seepage through and underneath the dam

DEC 14 2007

Embankment top elevation (ft)	Streambed elevation at downstream embankment toe (ft)	Structural height (difference between embankment top elevation and streambed elevation at downstream embankment toe) (ft)		
Embankment length (ft)	Embankment top width (ft)	Embankment bottom width (ft)	Embankment slopes Upstream (vertical / horizontal) Downstream	
Proposed normal pool elevation (ft)	Impoundment flood elevation (ft)	Maximum vertical drawdown capability (ft) (Attach operational procedure of the proposed structure, if available)		
Have soil borings been taken at dam location? <input type="checkbox"/> No <input type="checkbox"/> Yes (If Yes, submit results with permit application)	Will a cold water underspill be provided? <input type="checkbox"/> No <input type="checkbox"/> Yes (If Yes, invert elevation (ft.))	Do you have flowage rights to all proposed flooded property at the design flood elevation? <input type="checkbox"/> No <input type="checkbox"/> Yes		

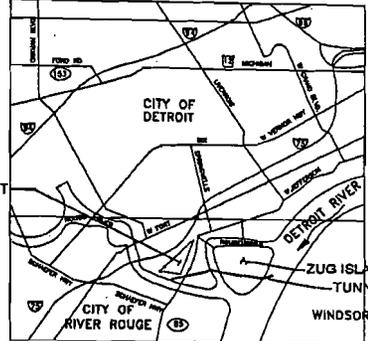
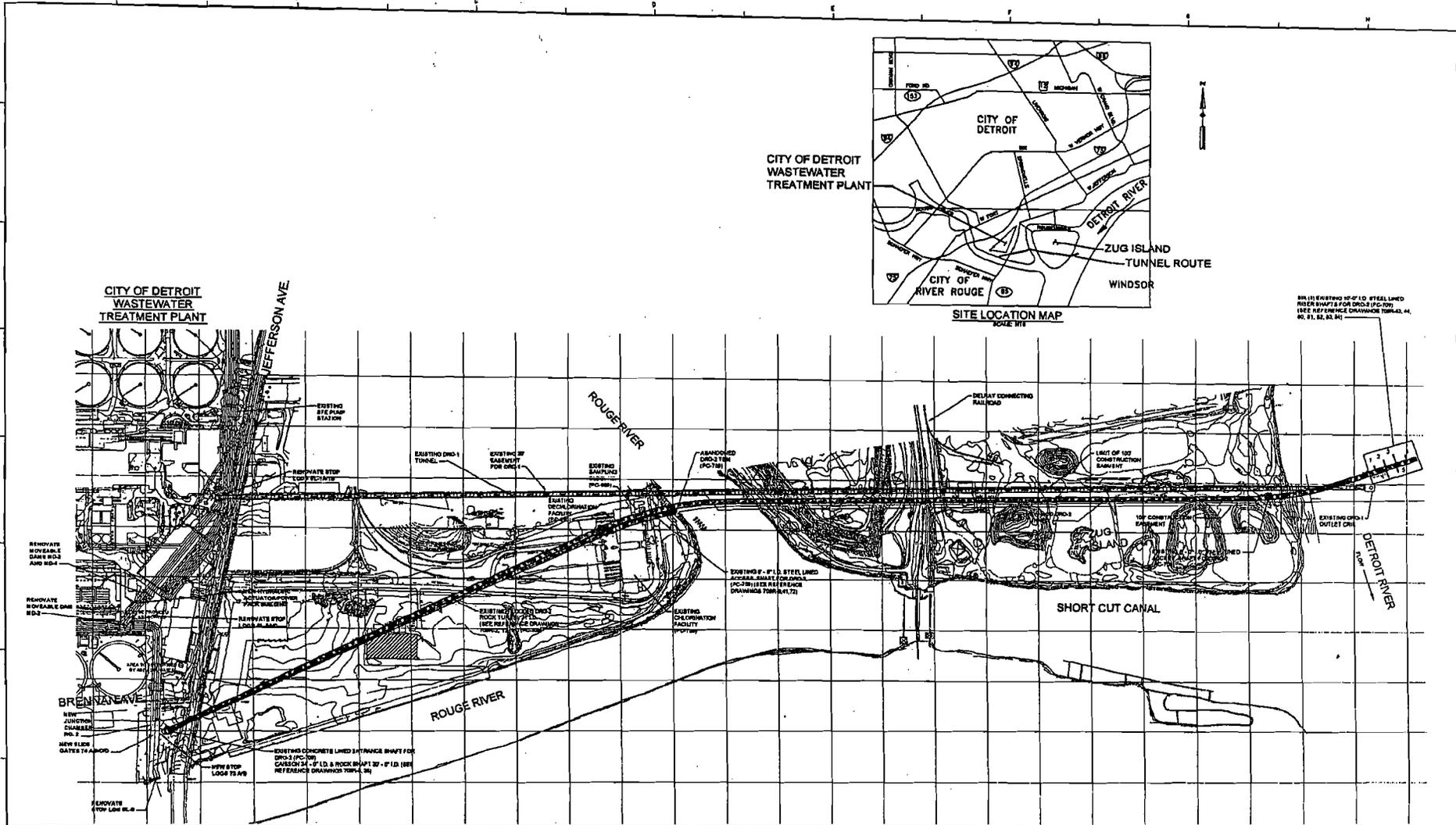
18 UTILITY CROSSINGS (See Sample Drawings 12 and 13)

- If side casting is required, complete Subsections 10A and 10B. If spoils will be placed in wetlands or wetlands may be impacted, complete Section 12.
- Attach additional sheets with the requested information as needed for multiple crossings.

What method will be used to construct the crossings?
 flume plow open trench jack and bore directional drilling

Crossing of Inland Lake or Stream floodplain
 international waters wetlands (also complete Section 12)

Type	Number of wetland crossings	Number of inland lake or stream crossings	Pipe diameter (in.)	Pipe length per crossing (ft.)	Distance below streambed or wetland (in.)	Trench width (ft.)
<input checked="" type="checkbox"/> sanitary sewer	N/A	2	258	1050	1,040	N/A
<input type="checkbox"/> storm sewer						
<input type="checkbox"/> watermain						
<input type="checkbox"/> cable						
<input type="checkbox"/> oil/gas pipeline						



SEE LIST OF EXISTING 24\"/>

WATERWAY : DETROIT RIVER AND ROUGE RIVER
 CITY : DETROIT, MICHIGAN
 COUNTY : WAYNE
 SHEET 1 OF 6
 DECEMBER 12, 2007

DESIGNED BY: _____
 DRAWN BY: _____
 CHECKED BY: _____
 PROJECT MANAGER: _____

MODIFIED DETROIT RIVER OUTFALL NO. 2
 (MOD DRO-2)

GENERAL SITE PLAN

SCALE: 1" = 100'
 DATE: 12-12-2007

PLAN PREPARED BY:
 PARSONS BRINCKERHOFF MORGAN INC.
 1500 BRINCKERHOFF
 ALUMI ABLING RD, SUITE 1000
 DETROIT, MI 48206
 PHONE: 313-822-6100
 FAX: 313-822-6100

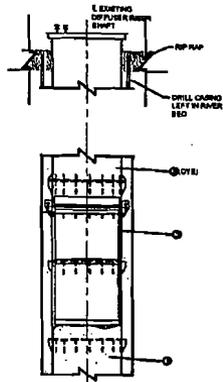


APPLICANT:
 CITY OF DETROIT
 WATER AND SEWERAGE DEPARTMENT

A.D.C.O. PERMIT NO. _____
 S&P NO. _____
 DSD CONTRACT NO. PC-171
 FILE NO. _____
 DRAWING NO. _____

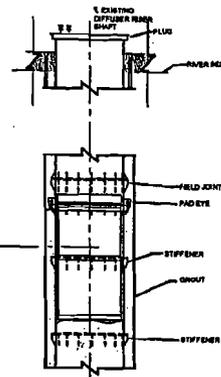
SECTION	TURN	NUMBER	STATION	POSITION
1	5	0	2	1
2	1	1	2	0

FILED



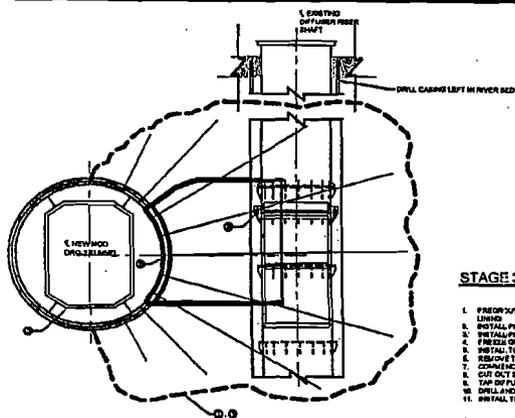
STAGE 1

1. UNDERLIE 6" SHAFT AND OVER SURVEYS OF DIFFUSER RISER SHAFT PLUGS AND TOP HAP.
2. VENT PLUGS AND REMOVE TO SURFACE.
3. REPAIR AND FILL AND PROVIDE NEW BRASS TIE RODS CONCRETE FROM SURFACE INTO DIFFUSER RISER SHAFTS. ALLOW FRESH CONCRETE TO HARDEN.
4. INSTALL ECONOMIC FLOID IN SHAFT FOR CONNECTION PROTECTION AND INFLATE BRASS.
5. INSTALL SUPPORT IN SHAFT, IF REQUIRED, BY FREEST PROCEE.
6. REPLACE PLUGS AND PRESSURE TEST BRASS. CLOSE VENT AND FILLING VALVES.
7. DRAIN DOWN WATER IN SHAFT 2 FEET BELOW TOP PLUG LEVEL. ADD COLORED DYE TO WATER.



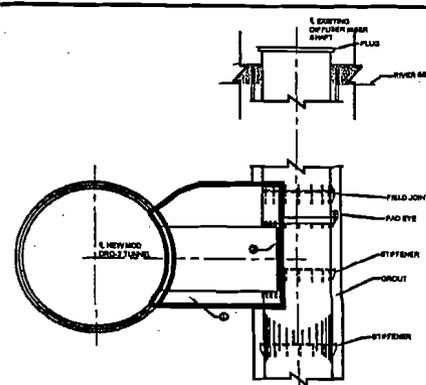
STAGE 2

1. DRIVE 6" DRO TUNNEL.
2. REMOVE TBM EQUIPMENT AND PAWLING GEAR.
3. OCCUPY VENTILATION BY ITEM.
4. INSTALL SAFETY BULKHEAD IN TUNNEL.
5. SHUT UP TBM HEAD.
6. CHIT END WALL BEHIND TBM PRESSURE BULKHEAD.



STAGE 3

1. FREE OUT AIR TO LIMIT GROUNDWATER MOVEMENT BY DRILLING THROUGH TUNNEL LINING.
2. INSTALL PRESSURE PLANT.
3. INSTALL PRESSURE PIPES AND MONITORING EQUIPMENT.
4. FREEST DRILLED.
5. INSTALL TUNNEL SUPPORT FEAS.
6. REMOVE TUNNEL LINING AND BRASS.
7. COMPLETE ELEVATION AND INSTALL BRASS SUPPORT.
8. CUT OUT STIFFENERS AND PAD EYE'S BRASS. DO NOT CUT AT FIELD JOINT.
9. TOP OFF FLOID IN RIVER SHAFT AND DRAINAGE.
10. DRILL AND INSTALL BREAK PLATES.
11. INSTALL THERMUS INSULATION.



STAGE 4

1. COMPLETE JET LINING AND TUNNEL CONNECTION.
2. BACKFILL AND VENT (PARTY GROUNDING).
3. REMOVE PRESSURE PLANT.
4. REMOVE ALL NON ESSENTIAL TUNNEL EQUIPMENT.
5. INSTALL SYSTEM EQUIPMENT IN TUNNEL AND NEAR SURFACE STRUCTURES.
6. CUT THROUGH DIFFUSER RISER SHAFTS.
7. REMOVE NEAR AND TUNNEL EQUIPMENT.
8. MAKE ENTRANCE SHAFT CONNECTION TO BRG.
9. FLOOD DIFFUSER RISER SHAFTS AND TUNNEL.
10. REPLACE RISER SHAFT PLUGS WITH DEFLECTOR CAPS.

SCALE: 1/4" = 1'-0"

NOTES:

1. DIFFUSER RISER SHAFT NO. 8 NOT SHOWN.

WATERWAY : DETROIT RIVER AND ROUGE RIVER
CITY : DETROIT, MICHIGAN
COUNTY : WAYNE
SHEET 5 OF 6
DECEMBER 12, 2007

DESIGNED BY:	SEAL & STAMP
DRAWN BY:	
CHECKED BY:	
PROJECT NUMBER:	

MODIFIED DETROIT RIVER OUTFALL NO. 2 (MOD DRO-2)

DIFFUSER RISER SHAFTS ASSUMED CONSTRUCTION METHOD

DATE: 12/12/07



PLANNED BY: P.B. ENGINEERING & CONSTRUCTION, INC.
333 BROADVIEW ST.
SUNNYVALE, IL 60158
DETROIT, MI 48202
PHONE: 313-962-8800
FAX: 313-962-4410



APPLICANT:
CITY OF DETROIT
WATER AND SEWERAGE DEPARTMENT

PROJECT NUMBER	
DATE	
FILE NO.	PC-771
DRAWING NO.	

SECTION NO.	
TOTAL	15
NO.	0
DATE	12/12/07
BY	
DATE	
BY	
DATE	



May 28, 2008

Faxed on May 28, 2008

Robert Parsons
MDOT Public Hearings Officer
Bureau of Transportation Planning
P.O. Box 30050
Lansing, MI 48909
Fax: 517-373-9255
E-mail: parsonsb@michigan.gov

**RE: Comments on the Draft Environmental Impact Statement for the
Detroit River International Crossing (DRIC)**

Dear Mr. Parsons:

The Michigan Environmental Council (MEC) submits these comments out of concern for the environmental impacts of the proposed border crossing system between the international border cities of Detroit, Michigan, and Windsor, Ontario – the Detroit River International Crossing, or the DRIC. In particular, MEC is concerned with the Michigan Department of Transportation's (MDOT) lack of reasonable alternatives to its preferred outcome and MDOT's misleading treatment of air quality impacts. MEC is concerned that these oversights could lead MDOT to overlook important environmental and economic considerations by proceeding without thoroughly evaluating these two aspects.

1) Reasonable Alternatives Requirement

NEPA requires that all federal agencies consider the environmental consequences of "major Federal actions significantly affecting the quality of the human environment" before deciding to proceed with a specific proposal.¹ NEPA is a process. The substantive goals of NEPA are to be realized through a set of "action-forcing" procedures that require that agencies take a "hard-look" at the environmental consequences of their proposed actions.² A procedure that helps agencies review the environmental consequences of potential actions is an evaluation of Reasonable Alternatives to the preferred agency outcome.

Indeed, Alternatives, including the Preferred Alternative, are "at the heart of the environmental impact statement".³ The agency "should present the environmental

¹ 42 U.S.C. 4332(2)(C)

² *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 350-51 (1989)

³ 42 U.S.C. 1502.14

impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decisionmaker and the public.”⁴ The EIS “provides a basis for an evaluation of the benefits of the proposed project in light of the environmental risks, and a comparison of the net balance for the proposed project with environmental risks presented by alternative courses of action.”⁵

a) MDOT Has Not Analyzed Reasonable Alternatives To Its Preferred Outcome

MDOT begins its Alternatives discussion with a brief history of “[f]ifty-one combinations of connectors, plazas and crossings” on the U.S. side of the border.⁶ This part shows how MDOT winnowed down the field of potential sites. The “Illustrative Alternatives” section offers a glimpse into the initial planning aspects of the project, but is not a discussion of Alternatives as contemplated by NEPA or the courts that interpret that act, regardless of how MDOT framed it.

Sufficient analysis of “alternatives should accompany the proposed action through agency review process in order not to foreclose prematurely options which might have less detrimental effects.”⁷ MDOT has not considered reasonable *Alternatives* to its Preferred Alternative, but rather has simply presented a *variety of designs* for its Preferred plan in addition to the statutorily required “no build alternative”.⁸

MDOT’s various “Alternatives” do contemplate a variety of plaza, service road, access road, and highway entrance configurations.⁹ Section 2.2.4 offers up a superficial treatment of essentially two “practical alternatives”: The standard “no build alternative” and nine build alternatives¹⁰ which are “very similar to Alternatives #1, #2, #3, #5, and #14” in some respects.¹¹ The issue here is that these options, while some of them may have different plaza footprints and road configurations, do not offer the public and decisionmakers a reasoned choice of Reasonable Alternatives, especially regarding the economic and environmental costs of the Preferred Alternative. These options do not meet the test for Alternatives, which is the “heart” of the EIS.¹²

An exhaustive discussion of the environmental effects of Alternatives is not required.¹³ Likewise, a “crystal ball inquiry” is not required.¹⁴ What is required is that agencies “[r]igorously explore and objectively evaluate all reasonable alternatives”.¹⁵

⁴ Id.

⁵ *Natural Resources Defense Council v. Morton*, 458 F.2d 827, 837 (1972)

⁶ Detroit River International Crossing, Draft Environmental Impact Statement and Draft Section 4(f) Evaluation, section 2, available at: <http://www.partnershipborderstudy.com/pdf/us-reports/Section%202.pdf>

⁷ Id. at 834, fn 12

⁸ 42 U.S.C. 1502.14(d)

⁹ Detroit River International Crossing, Draft Environmental Impact Statement and Draft Section 4(f) Evaluation, section 2, available at: <http://www.partnershipborderstudy.com/pdf/us-reports/Section%202.pdf>

¹⁰ Id. at section 2.2.4

¹¹ Id.

¹² 42 U.S.C. 1502.14

¹³ *NRDC v. Morton*, at 837

b) Reasonable Alternatives

A discussion of Reasonable Alternatives necessarily includes increased public transit capacity (rail and bus) and freight rail infrastructure. Indeed, with gas and diesel prices increasing significantly each month, it is both unreasonable and irresponsible for MDOT not to consider public transit and freight rail as Reasonable Alternatives.

i) Public Transit

An important aspect of a public transit Reasonable Alternative is a cost-benefit analysis. The cost-benefit analysis must include the environmental costs and benefits as well as the economic costs and benefits, and potentially others. Only then will the public and decisionmakers be able to decide whether an expense of this magnitude is justified vis-à-vis investment in public transit.

MDOT's public transit Alternative must include an analysis of potential ridership for bus and commuter rail, where the potential riders begin their trips, and what their final destinations are. This analysis may necessarily include treatment of connecting existing public transit systems, rail service to Metro Airport from Windsor, and establishing new transit systems and rail lines. It must also include potential Green House Gas avoidance, and other environmental benefits that might accrue from this Alternative. This sort of scope was contemplated by the NRDC court: "[w]hen the proposed action is an integral part of a coordinated plan to deal with a broad problem, the range of alternatives that must be evaluated is broadened."¹⁶

ii) Freight Rail

Again, freight rail is undoubtedly a Reasonable Alternative, and arguably much more reasonable than a vehicle bridge. Further, this option becomes increasingly more reasonable with each fuel increase. This is a similar analysis to that of public transit; but, since a rail line may do double duty as a passenger and freight system component, a cost savings must be properly accounted for.

One reasonable alternative to the selected alternatives, insofar as freight traffic is concerned, is intermodal rail. MEC will not discuss that alternative in detail other than to note that intermodal rail appears to have great promise as an alternative to the proposed highway crossing for the accommodation of existing and future truck traffic. The potential demand for intermodal rail is addressed in Section 13 of comments on the DRIC DEIS that were submitted by Dietrich R. Bergmann, PhD, PE on April 29, 2008 and possibly in his subsequently submitted addenda to those comments.

¹⁴ Id.

¹⁵ 42 U.S.C. 1502.14(a)

¹⁶ *NRDC v. Morton*, at 837

2) MDOT Has Misleadingly Treated Air Quality Impacts

The DEIS misleadingly concludes that air quality in the area of the Preferred Alternative will improve regardless of whether or not the bridge is built. This assumption is based on more stringent EPA air quality rules for particulate matter and carbon monoxide going into effect over time. However, as acknowledged in the DEIS, Southeast Michigan currently is in nonattainment for current air quality standards and sensors in southwest Detroit are consistently reporting levels of pollutants above current EPA guidelines. Establishment of air quality standards by the EPA does not guarantee improving air quality, as demonstrated by the current nonattainment status, and it can not be assumed that air quality will quickly improve as the standards become more stringent.

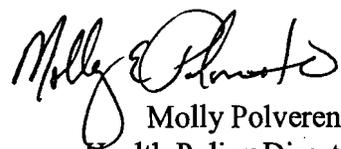
Further, there is concern among many health professionals that the current air quality standards from the EPA are insufficient for protecting the public's health. This includes populations that are particularly vulnerable to the negative health effects air pollution, including young children and the elderly. It should be of concern that the proposed location for the plaza is near to an elementary school. The rates of asthma in Detroit are several times higher than the national average and it is clear that poor air quality is closely associated with the incidence of asthma. While the MDOT is to be commended for including options for reducing air pollution during construction, options for reducing air pollution once the plaza is open must also be included in any final plan. In particular, alternatives for reducing diesel emissions from idling should be adequately addressed in the final plan.

3) Conclusion

The Michigan Environmental Council appreciates the opportunity to raise our concerns about the proposed border crossing system between the international border cities of Detroit, Michigan, and Windsor, Ontario – the Detroit River International Crossing, or the DRIC. MEC looks forward to MDOT's thorough evaluation of these Reasonable Alternatives. If you have any questions about these comments, or would like to discuss our comments further, please feel free to contact us.

Sincerely,


Timothy R. Fischer, Esq.
Deputy Policy Director
tim@environmentalcouncil.org


Molly Polverento
Health Policy Director
molly@environmentalcouncil.org



STATE OF MICHIGAN
DEPARTMENT OF COMMUNITY HEALTH
LANSING

JENNIFER M. GRANHOLM
GOVERNOR

JANET OLSZEWSKI
DIRECTOR

March 25, 2008

David W. Wresinski, Administrator
Project Planning Division
Bureau of Transportation Planning
State of Michigan DOT
P.O. Box 30050
Lansing, MI 48909

RE: Detroit River International Crossing Study

Dear Mr. Wresinski:

This letter is provided as a response to your February 21, 2008 letter requesting comments relevant to the Draft Environmental Impact Statements (EIS) for the various proposals for the Detroit River International Crossing in Wayne County.

We have noted that there are no licensed health care facilities in the vicinity of the project proposals. United Community Hospital, approximately two miles from the proposed sites, currently does not have any patients and their licensed beds are in the process of being transferred to another facility.

Specifically, we have noted that within a radius of three miles of the proposed improvements there are:

- No licensed hospitals
- No licensed nursing homes
- No licensed homes for the aged, and
- No certified End Stage Renal Dialysis (ESRD) facilities

The draft EIS mentions that the construction "will not affect major roads except Fort Street (M-85) and Jefferson Avenue, which will both be bridged. Short term temporary detours may be necessary at those two streets."

The draft also mentions that there is a Community Health and Social Services (CHGASS) center in the Delray area that would be relocated.

Since the licensed health care facilities/services are not in close proximity to the proposed construction; most of the patients, visitors, and staff at these facilities will not be adversely impacted for the duration of the project in terms of longer travel times to/from these facilities.

CAPITOL VIEW BUILDING • 201 TOWNSEND STREET • LANSING, MICHIGAN 48913
www.michigan.gov • (517) 373-3740

Printed by members of:



David W. Wresinski
March 25, 2008
Page 2 of 2

Thus at this time, we believe there would be no significant adverse impact of the proposed project on licensed healthcare facilities. Also, there do not appear to be any permitting requirements relevant to your project within the regulatory jurisdiction of the Health Policy, Regulation and Professions Administration.

Sincerely,



Nick Lyon
Deputy Director, Health Policy, Regulation and Professions Administration

cc: James D. Scott, P.E., HFES

NL/PGZ/mw



STATE OF MICHIGAN
DEPARTMENT OF AGRICULTURE
LANSING

JENNIFER M. GRANHOLM
GOVERNOR

DON KOIVISTO
DIRECTOR

March 14, 2008

Mr. David E. Wresinski, Administrator
Project Planning Division
Bureau of Transportation Planning
Michigan Department of Transportation
P.O. Box 30050
Lansing, MI 48909

Re: Detroit River International Crossing Draft Environmental Impact Statement

Dear Wresinski:

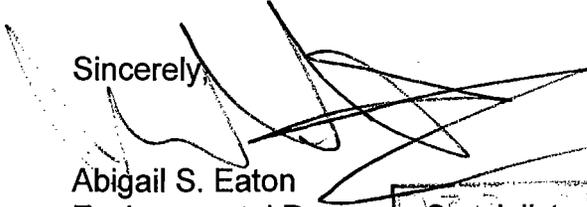
I received your request for review and comment on the Detroit River International Crossing Draft Environmental Impact Statement (DEIS). I have reviewed the DEIS with Michigan Department of Agriculture staff as well as attended the regular meetings of the state and federal agencies leading up to the development of the DEIS document.

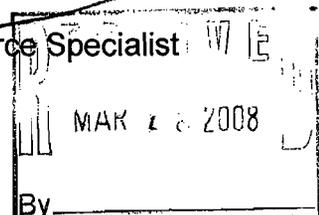
This area is a highly urbanized corridor. There are no impacts to agriculture within the site location. We have not identified nor do we anticipate any impacts on established county or intercounty drains.

As this would serve as a primary international border crossing, our main concern at this point is that the plaza areas have sufficient facilities to conduct necessary inspections of incoming animals and plants to prevent potential introduction of unwanted insects, pests, and disease before they travel a significant distance into the State. The DEIS does not address this directly but it is my understanding that the Government Service Agency is serving as the primary conduit for translating the needs of USDA-APHIS into the development of adequate inspection facilities. We look forward to the resulting improvement in the screening capabilities in this very busy international corridor.

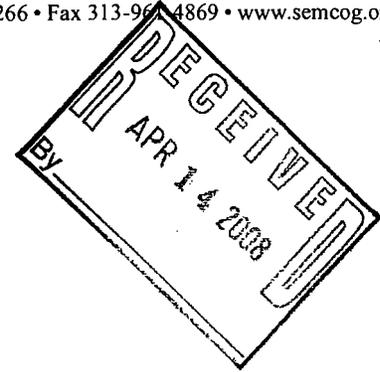
To the best of our knowledge, we do not have any additional concerns regarding the issues identified in the DEIS. We appreciate being included in this NEPA process. Feel free to contact me at 517-241-3933, if I can be of further assistance on this project.

Sincerely,


Abigail S. Eaton
Environmental Resource Specialist



April 09, 2008



David W. Wresinski, Administrator/Proj Planning Div, Bureau Trans Planning
Michigan Department of Transportation
P O Box 30050
Lansing, MI 48909

RE: Application for federal assistance from Department of Transportation for a project entitled "The Detroit River International Crossing Study"
Regional Clearinghouse File No.: TR 080553

Dear Mr. Wresinski:

SEMCOG, the Southeast Michigan Council of Governments, has processed a review for the above application according to intergovernmental review procedures established in Presidential Executive Order 12372 and assumed in the Michigan Federal Project Review System.

As the designated regional planning agency for Southeast Michigan, we notified the following local government agencies of your project: Wayne County Division of Planning; SEMCOG/Transportation Programs; Detroit Planning & Development Dept; City of Wyandotte; City of Woodhaven; City of Trenton; City of Southgate; City of Riverview; City of River Rouge; City of Melvindale; City of Lincoln Park; City of Gibraltar; City of Ecorse; and City of Allen Park.

As of this date, SEMCOG/Transportation Programs has submitted written comments, which are attached. We will forward additional comments, if any, for your information and attention.

SEMCOG's staff has reviewed the application materials which you submitted and finds that your project does not conflict with areawide plans.

Sincerely,

William Parkus
Regional Review Office

cc: SEMCOG/Transportation Programs

MEMO

Southeast Michigan Council of Governments
535 Griswold, Suite 300
Detroit, MI 48226
(313) 961-4266
Fax (313) 961-4869
www.semco.org

April 4, 2008

TO: Bill Parkus

FROM: Jennifer Evans

SUBJECT: Comments on the Draft Environmental Impact Statement and Draft Section 4(f) Evaluation for the Detroit River International Crossing Study

SEMCOG staff has reviewed the Draft Environmental Impact Statement and Draft Section 4(f) Evaluation for the Detroit River International Crossing Study and submits the following comments, followed by comments on the Air Quality Impact Analysis Technical Report.

Comments on Environmental Impacts

The development of a second span across the Detroit River will increase impervious surface. Storm water often carries sediment and pollutants that can impact the aquatic ecology of a water body. A storm water management system that avoids discharge, but rather collects, detains, and treats on-site should be developed as part of the project.

For houses or other structures that will be demolished or relocated, sewer lines should be filled with concrete or grout at the basement level. Abandoned wells should also be filled with concrete or grout from the bottom up. This is to avoid contamination of local groundwater that eventually would be discharged to the Detroit River.

Construction activities create conditions that promote erosion and sedimentation. The City of Detroit's sewer system as well as any wetlands in the project area should be protected from sedimentation pollution. Thus, compliance with and a permit under Part 91 (Soil Erosion and Sedimentation Control) of PA 451 of 1994, the Natural Resources and Environmental Protection Act, may be required.

0.70 acres of wetlands have been identified in the project area. A hydrologic connection does exist between some of the wetlands and the Detroit River. The wetlands cleanse storm water — removing sediment — before release to the Detroit River. These wetlands and their natural functions should be protected to the fullest extent possible from encroachment or destruction. Thus, compliance with and a permit under Part 303 (Wetland Protection) of PA 451 of 1994, the Natural Resources and Environmental Protection Act, may be required.

Comments on Alternatives Considered

p ES-5 indicates the No Build Alternative includes the proposed six-lane replacement of the existing Ambassador Bridge. Do the Build Alternatives include this bridge as well? This project has been proposed for amendment to the 2030 Regional Transportation Plan for Southeast Michigan on June 26, 2008 and may proceed even if a new crossing is constructed. It should, therefore, be included as part of the analysis, particularly with respect to indirect and cumulative impacts.

p ES-24 indicates I-75 and its service drive would be realigned under Alternatives 3 and 11. This does not appear to be addressed anywhere else in the descriptions of the Practical Alternatives.

p 2-5 introduces four private-sector alternatives. Subsequent discussion explains why the DRTP and second span of the Ambassador Bridge were dropped from further analysis. The Mich-Can proposal and Don Flynn proposal are never fully described, nor is it adequately explained why they were dropped.

It is difficult to follow the narrowing of alternatives. It appears that there were 51 illustrative alternatives originally identified. Some of those were eliminated due to fatal flaws, leaving 37 alternatives. The private-sector alternatives were eliminated and the area of continued analysis was narrowed resulting in 13 Preliminary Practical Alternatives. Certain plaza and interchange options were then eliminated and additional alternatives were added based on the value analysis workshop and public input. A table listing the 51 original illustrative alternatives and the fatal flaws that narrowed the list down to 37 may help. Another table showing the narrowing of the Preliminary Practical Alternatives to Practical Alternatives would also help.

It is not clear from the discussion on p 2-51 if crossing X10A remains viable for further analysis or not.

Comments on Traffic Analysis

Table S-8, p ES-43, indicates the combined traffic at the Ambassador Bridge and the new crossing would increase under the Build Alternatives compared to the No Build Alternative. Is this increase due to induced traffic or does it represent a shift away from the Blue Water Bridge and Detroit-Windsor Tunnel? If traffic would be diverted from existing crossings, is there any concern about the continued validity of proposed Blue Water Bridge plaza enhancements?

Are the six upcoming projects referenced on p 3-33 included in the traffic analysis? If so, are they included in only the No Build Alternatives or the Build Alternatives as well?

p 3-62 indicates local roads would operate at an acceptable LOS under Build and No Build Alternatives. The discussion of the freeway segments is limited to the Build Alternatives. Will the freeway exceed capacity under a No Build situation?

p 3-70 indicates additional coordination will occur regarding congestion in the area of the new crossing. SEMCOG fully supports and encourages this coordination.

Comments on Community Impacts/Environmental Justice (EJ) Analysis

It is not clear how a finding of no disproportionately high/adverse impacts on minority populations can be defended. The DEIS indicates there will be adverse effects on all environmental justice groups; simply because non-minority groups would also be impacted does not negate the heavy burden on minority populations. Compared to regional averages, minority persons and low-income households are over-represented in the project area, which in SEMCOG's estimation will always lead to disproportionate impacts.

The DEIS does a good job of identifying most of the expected impacts on EJ groups and related mitigation strategies. However, the documentation does not fully address some potential impacts as follows.

The discussion of residential relocations indicates there is a sufficient supply of properties in Wayne, Oakland, and Macomb Counties to absorb the displaced. This seems to be a very wide area of analysis. What is the level of supply in the more immediate project area for those who may not wish to move far away?

Because of the large proportion of renter-occupied housing in the study area, the relocation strategy should adequately address the particular needs of renters.

MDOT has indicated that they will provide purchasing, relocation assistance and advisory services for anyone whose property is needed for the project. However, concerning properties not taken by the new plaza, the project will reduce neighborhood cohesion in the blocks surrounding the existing plaza. That area would be divided as a result of the plaza expansion causing several local businesses to be relocated. This division of the neighborhood could potentially present a challenge to the local low-income population to find sufficient alternatives to the departed businesses of comparable types.

It should also be noted that the proposed plaza would be directly adjacent to the existing Southwestern High School. Adequate buffers are required to prevent any unreasonable safety and hazardous impacts to the high school and/or its students and faculty.

The DEIS indicates a number of pedestrian crossings over I-75 will be removed and some existing transit routes will be impacted, and that replacement of the pedestrian crossings and maintenance of transit service will be discussed in the FEIS. Given that nonmotorized and transit modes are vital in this community, a more strongly worded commitment to replacing crossings as appropriate and maintaining adequate transit service should be considered.

p ES-42 discusses how the Michigan Department of Transportation (MDOT) and Federal Highway Administration (FHWA) are exploring concepts to enhance the Delray community under the Build Alternatives. The agencies should continue to work with community stakeholders to not only refine these concepts, but develop action plans to ensure the implementation of those plans.

Both the Delray community and Southwest Detroit as a whole are in a strategic location with regard to the transportation system. As a result, this community has historically been host to

many of the region's and state's primary transportation facilities. The state's largest marine port is located here, and most of Michigan's interstates and Class I railroads lead to this hub. In addition to the DRIC, there are at least four major facilities that are either under construction or consideration — the Ambassador Bridge Gateway project (under construction); and the proposed Detroit Intermodal Freight Terminal, Detroit River Tunnel Partnership (replacement tunnel), and Ambassador Bridge Enhancement Project (replacement bridge). While it is not required by the NEPA process, MDOT and FHWA should work with the community to assess the cumulative impacts of these projects and develop strategies not only to mitigate the negative impacts, but to take better advantage of the community's strategic location as a transportation hub.

Miscellaneous Comments

The sidebars on p ES-17 are out of context as these items are not discussed in the summary text.

A project to construct a new border crossing is proposed to be amended to the 2030 Regional Transportation Plan for Southeast Michigan on June 26, 2008. The project has already been included in a regional air quality conformity analysis. Depending on the Preferred Alternative selected, minor adjustments may be necessary.

p 3-1 references the seven-county SEMCOG region, but it is never explained what SEMCOG is or which counties are included.

p 3-42 indicates "(t)he Practical Alternatives are consistent with planning and zoning requirements. The proposed project has been discussed with SEMCOG ... and is scheduled for inclusion in their Regional Transportation Plan in June 2008. They have the potential to reinforce the compatibility of residential and industrial areas of Delray." It needs to be clarified that the Practical Alternatives would reinforce this compatibility. SEMCOG has no authority to do so, but given the current sentence structure, this seems to be implied.

It is understood that the Canadian environmental process is running on a related, yet separate, course. Will an opportunity be provided to consider the findings of that process within the context of the FEIS or even before then?

Comments on Air Quality Impact Analysis Technical Report

Overall, the air quality impact analysis is very thorough and easy to understand. MDOT and its consultant have done a good job of reviewing and analyzing the large amount of data that have been gathered on current and expected air quality conditions, both in the project area and in Southeast Michigan as a whole.

Section 2.1.2 Monitoring Station Data

While the three-year average ending in 2006 showed Southeast Michigan meeting the national ozone standard, high values at three monitors in 2007 pushed the latest three-year averages at these monitors over the standard. Thus, the region has not yet demonstrated attainment. In addition, the U.S. Environmental Protection Agency (USEPA) has just announced (on March 12, 2008) a tightening of the ozone standard from .08 ppm to .075 ppm.

Section 5.1 NAAQS and Regional Attainment Status

The CO conformity budget is 3,842.8 tons/day, not 1,946 tons/day.

Table 5-1: On March 12, 2008 USEPA changed the 8-hour ozone standard from 0.08 ppm to 0.075 ppm. The one-hour standard has been revoked.

Section 5.3.1 Regional Conformity

A project to construct a new border crossing is proposed to be amended to the 2030 Regional Transportation Plan for Southeast Michigan on June 26, 2008. The project has already been included in a regional air quality conformity analysis. Depending on the Preferred Alternative selected, minor adjustments may be necessary.

Section 5.3.2.2 PM2.5 Hot-spot Qualitative Analysis

The last paragraph in this section (Summary) says the Southwestern High School and Lafayette monitors are “well within the 24-hour standard.” In fact, both of these monitors are currently violating the 24-hour standard. The standard is $35 \mu\text{g}/\text{m}^3$. The latest three-year averages for these monitors is 40 for Southwestern High School and 37 for Lafayette. The rest of the information in this paragraph is correct.

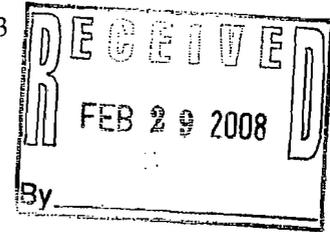
Section 6 Construction Impacts

MDOT should require contractors to use construction equipment that at least meets USEPA’s Tier 3 standards for off-road equipment. If Tier 4 equipment (which is being phased in between 2008 and 2016) is available, this should be used.

The project design should include landscaping — using native vegetation — to help absorb pollution, reduce fugitive dust, and approve overall aesthetics in the vicinity of the project.

February 28, 2008

Regional Clearinghouse Code: TR 080553



David W. Wresinski, Administrator/Proj Planning Div, Bureau Trans Planning
Michigan Department of Transportation
P O Box 30050
Lansing, MI 48909

This is to acknowledge receipt of your draft environmental statement which you have submitted for review, according to Michigan Federal Project Review System guidelines developed in response to Presidential Executive Order 12372 - Intergovernmental Review of Federal Programs - or according to other state or federal guidelines.

Funding Agency/Program: Department of Transportation
Draft Environmental Impact Statement

Project Title: The Detroit River International Crossing Study

Please direct any questions you may have concerning this review to the following SEMCOG staff person:
William Parkus, Regional Review Office, at (313) 961-4266.

A Regional Clearinghouse review will be completed by **Mar 29, 2008**, within the federal time limits.

The following agencies will be contacted for their comments during the review period:

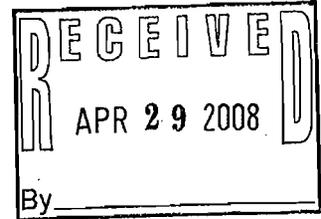
Wayne County Division of Planning; Detroit Planning & Development Dept; City of Wyandotte; City of Woodhaven; City of Trenton; City of Southgate; City of Riverview; City of River Rouge; City of Melvindale; City of Lincoln Park; City of Gibraltar; City of Ecorse; and City of Allen Park

Please supply them with appropriate information, if requested, to expedite the review process.



April 25, 2008

Mr. Robert Parsons
Public Involvement/Hearing Officer
Michigan Department of Transportation
PO Box 30050
Lansing, Michigan 48909



**Subject: City of Detroit Comments – The Detroit River International Crossing (DRIC)
Draft Environmental Impact Statement and Draft Section 4(f) Evaluation
Detroit, Michigan**

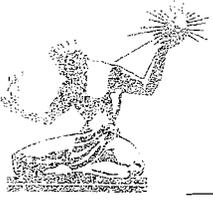
This letter provides a technical opinion on the Detroit River International Crossing (DRIC), Draft Environmental Impact Statement (DEIS) and Draft Section 4(f) Evaluation, dated February 2008. The city of Detroit received the report on March 7, 2008. The United States Department of Transportation, Federal Highway Administration (FHWA) and Michigan Department of Transportation (MDOT) are the lead agencies for the proposed project.

The comments presented are based on the information developed pursuant to the National Environmental Policy Act (NEPA) process and are the opinions and concerns raised by the city of Detroit Department of Environmental Affairs (DEA), Health & Wellness Promotion Department, and the Recreation Department, provided respectively.

Department of Environmental Affairs

Environmental Matters

- The DEIS indicates that indirect and cumulative traffic and air quality impacts are not expected to increase. The DEIS fail to take into account the indirect and cumulative traffic and air quality impacts for the six important transportation projects that affect the study area (page 3-33).
- DRIC provides comparisons of 2013 and 2030 Daily Pollutant Burden Emissions on Mobile Source Air Toxics (MSATs) for each Build Alternative. The DEIS state that air pollutants will increase in the Plaza and Crossing areas. MSAT increase within the DRIC project area will be offset by a MSAT decrease at the Ambassador Bridge when referring to the No Build Alternative. This statement assumes a net balance in MSAT. Additional data/analysis is required to support this assumption. Furthermore, the DEIS failed to provide a comparison for MSAT No-Build verse Build Alternatives.
- DEA agrees that further evaluation of the noise wall is required. Also, a discussion between the City and MDOT regarding a potential agreement needs to occur prior to the development of the FEIS.



- Contaminated site assessments and cleanups are not contingent upon the construction of the DRIC, but redevelopment potential. Sites such as the Former Detroit Coke, Revere Cooper and Brass, Anaconda, Southwest Detroit Emergency Service Center (a.k.a. Public Safety Mall), etc. have undergone some level of cleanup in order to market the sites for redevelopment. This effort will continue on a case-by-case basis.

Social Economics

It is understood that for the purpose of this project, Detroit is the “host city”, whereas Delray is the “host community”. The DEIS leaves an impression (based on 2035 projections) that the construction of the DRIC, would provide approximately 25,000 jobs to the state, and in contrast expects major job loss (approx. 71,000), if not constructed. It is interesting to note that in all discussions while jobs will be lost within the host city/community due to the construction of the DRIC neither the host city/community is mentioned in regards to jobs created/growth.

A direct correlation of this point would be the current 56 businesses, roughly making up 686 – 920 jobs that currently exists (2008) verse the 775 permanent jobs estimated for the bridge operations in 2035. Our position is that the City has a current market that would be jeopardized by relocated/displaced as a direct result of the DRIC, leaving a net loss of approximately 145 jobs in 2035.

In addition, 324 to 414 dwelling units would be relocated/displaced as a direct result of the DRIC that would be realized as a loss in property tax. Yet, the DEIS mentions that “there would be significant gains in income taxes from jobs and associated sales tax from construction spending that would off-set the expected loss”. Need more detail.

What is being asked of the City is to sacrifice the Delray community for the good of the state and region. This is indicative of the general statements given under nearly every No Build Alternative that “past trends will continue”, when in fact progress is being made by the City. This is also evident based on the City’s goals for this area as identified in the City of Detroit Master Plan of Policies, 2004. The City does not simply take a wait and see approach when it comes to the Delray community. Various policies and procedures have been and are put into place to address many of the concerns mentioned in the DEIS, such as “heavy industrial growth”. This is currently being handled in many ways such as rezoning, Industrial Review Committee resolutions, and Host Community Agreements to name a few. In fact, it is unfair to state that Delray is expected to grow more industrial without a crossing.

General questions to be asked:

- What parameters are being used to identify the “local” economy?
- What efforts are in place to preserve Delray’s identity during and following the DRIC construction?
- Out of the 8,939 to 10,416 direct jobs and 22,986 to 26,784 indirect jobs during the construction period – how many will be specifically allocated to Detroit/Delray residents?
- Just Compensation/Fair Market Value may not be appropriate nor feasible given the current economy and market particularly given “A house in need of repair can be purchased for as little as \$15,000”, within the Delray community.



Health & Wellness Promotion Department

The Draft Environmental Impact Statement (DEIS) for the Detroit River International Crossing (DRIC) asks the reader to assume that only two alternatives exist: either do nothing and have the current river crossings exceed their capacity in a few years, or build a new river crossing in one of their identified alternative locations, all of which impact the Delray area. In fact a third alternative exists and that is to build another river crossing further downriver which would avoid further burdening the already overburdened Southwest Detroit area.

The DEIS states that traffic in terms of vehicle miles traveled (VMT) and vehicle hours traveled (VHT), especially for trucks, will improve overall in the SEMCOG Region while getting significantly worse in the border crossing area if one of their suggested alternative river crossings are built. This would seem to be in direct contradiction to Environmental Justice goals and principles by overburdening an area that has a majority minority population and a significant population living at or below the poverty level.

The DEIS goes on to assert that even though traffic will increase in the border crossing area, the air quality will improve due to improved emission equipment on trucks and low sulfur diesel fuel. This may be overly optimistic, even though, the air quality would improve much more if a river crossing further downriver were chosen because the amount of traffic in the Delray area would decrease rather than increase.

Recent research by the University of Michigan, in conjunction with local partners, under the auspices of Community Action Against Asthma and the Healthy Environments Partnership, has demonstrated that increased exposure to Diesel particulate matter increases the incidence and severity of asthma and increases the incidence of cardiovascular disease. In the case of asthma it has been shown that proximity to local sources of diesel particulate matter amplifies this effect. Due to the increases in traffic in the Delray area it is reasonable to expect increases in the incidence of asthma and cardiovascular disease in the Delray area due to this project.

Comments regarding Air Quality:

- The DRIC states that the overall air quality in the region is improving. This is not correct. USEPA has designated Wayne County and six (6) other Michigan counties as non-attainment for both ozone and PM_{2.5}.
- The DRIC based its conclusion on the assumption that the new EPA regulatory standards for diesel engines and fuel will generate adequate emission control in the future to reduce emission levels in 2035 to below levels identified in 2004. However, the number of vehicles hours in the Border Crossing area will increase upwards of 150% over the numbers identified in 2004.
- The DEIS does not address health impacts due to the DRIC. The Air Quality Impact technical paper that accompanied the DRIC study states that even though they can predict that air quality will improve with increased traffic, they do not have adequate models to predict the emissions,



- dispersion, and human exposure to airborne vehicle emission components. Therefore, no health impacts can be postulated. At a minimum an analysis of health impacts needs to be added to the DEIS.
- The DRIC did not account for an accumulative effect from other transportation projects forecasted for Detroit. The accumulative effect from those projects may well over burden the communities and have a negative effect on the air quality within the Border Crossing communities.
- The analysis for reduction of air emissions in 2035 is based on the fact that all the fleet vehicles will be in compliance with the EPA standards triggered in 2007. It does not account for or identify the number of Canadian owned and operated vehicles that are not required to comply with USEPA standards crossing the border or identify the number of trucks that are owned/operated by individuals whom tend to operate the older vehicles for longer periods of time than a major fleet operation.
- Detroit has one of the highest incident rates for asthma in the United States. The report indicates Mobile Source Air Toxics and diesel particulate matter will increase at the Border Crossing location, however, the air quality will be offset by a reduction of those pollutants at the Ambassador Bridge. Diesel exhaust contains significant levels of small particles (known as fine particulate matter) that pose serious health risks. Exposure to fine particles can aggravate asthma, cause lung damage and even result in premature death. In addition, **EPA has determined** that diesel exhaust is likely to cause lung cancer after years of exposure.

Health & Wellness Promotion Department Recommendation

The approval of the DRIC in Southwest Detroit may have a negative health impact on the citizens living in the surrounding communities. Our Department recommends that prior to starting construction and once the specific alternative is selected, MDOT conducts a Health Assessments on all potential impacts the project will have on a localized basis within the Border Crossing community. MDOT and SEMCOG must provide more than a regional assessment of air quality to ensure this project does not impact the health or quality of life for the citizens in Southwest Detroit. It is our contention that MDOT fail to adequately address the adverse health and environmental effects to the local community and its residents.

Detroit Recreation Department

The DRIC impacts on the Historic Fort Wayne (Fort).

- It is not clear why the Fort was not considered a Sensitive Receptor.
- The DEIS did not adequately analyze and evaluate the impact of noise on the Fort's immediate surroundings and users, and what special concerns might need to be addressed in regards to both interior and exterior uses during and after construction.



- The EIS did not adequately analyze and evaluate the visual impact of the DRIC on the Fort's immediate surroundings, users and what special design concerns should be implemented to help integrate the Plaza with the Fort.
- It appears that the air pollution sections focus on Southwest Detroit and ignores the potential impact that the Bridge and Plaza might have on the Fort's immediate surroundings and its users.
- The EIS was silent on the potential impact vibrations will have on the Fort structures during construction and long-term post construction.

Overview of the Draft Environmental Impact Statement

In general, the DEIS fails to provide substantial analysis of air and noise data and appears to be subjective on many occasions and is believed that the process of elimination based on theory was used in place of empirical analyses. Significant impacts within the Delray community will result based on the DRIC development. This is not to say that many of the concerns are insurmountable, but dialogue is needed, as the host city/community yet have questions and concerns needing to be addressed.

If there are any questions regarding this matter you may reach me at (313) 471-5115.

Respectfully Yours,

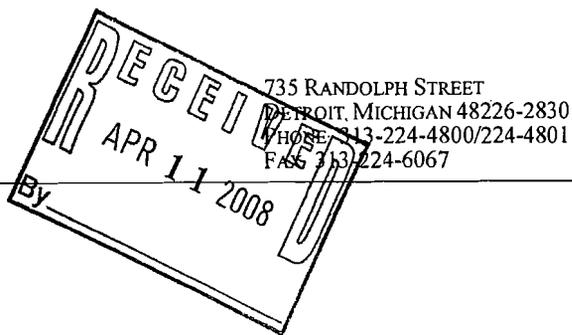
Vincent R. Nathan, PhD, MPH
Director

VRN/ras

cc: Honorable Kwame M. Kilpatrick, Mayor
Mr. Anthony Adams, Deputy Mayor
Dr. Phyllis Meadows, PHD, MSN, RN, Director of Detroit Health & Wellness Promotion
Ms. Loren S. Jackson, Director of Detroit Recreation Department
Mr. Marcell R. Todd, Director of Detroit City Planning Commission
file



CITY OF DETROIT
WATER AND SEWERAGE DEPARTMENT
GENERAL ADMINISTRATION



April 2, 2008

Mr. Robert Parsons
Public Involvement/Hearing Officer
Michigan Department of Transportation
P.O. Box 30050
Lansing, Michigan 48909

Dear Mr. Parsons:

**Regarding: Detroit River International Crossing (DRIC) Study
Draft Environmental Impact Statement and Draft Section 4(f) Evaluation**

Reference is made to the enclosed letter from Mr. David W. Wresinski, dated February 21, 2008 regarding the subject study.

The Detroit Water and Sewerage Department (DWSD) appreciates early involvement with the initiatives MDOT has advanced specific to the proposed Detroit River International Crossing. Pursuant to Mr. Wresinski's request, involved DWSD staff reviewed the Draft Environmental Impact Statement and Draft Section 4(f) Evaluation. Consistent with further instructions contained in the reviewed document, we are forwarding our attached comments to date direct to your attention. However, we respectfully reserve the right to comment further should circumstances warrant.

Please give careful consideration to our remarks and apprise of advances to coordinate this endeavor. You may contact me at (313) 224-4784, Ramesh Shukla at (313) 964-9894, or Mirza Rabbaig at (313) 964-9880 with any questions or to make arrangements to meet on this.

Sincerely,

Gary Fujita, P.E.
Deputy Director

GF/MR/GS

Enclosures

cc: David W. Wresinski, Administrator, MDOT



**Draft Environmental Impact Statement and Draft Section 4(f) Evaluation
The Detroit River International Crossing Study**

Prepared by

U.S. Department of Transportation

Federal Highway Administration

Michigan Department of Transportation

February 2008

Sixteen alternatives are presented in the report X-1 through X-15. The river crossing alternatives are situated as far south as Grosse Isle and as far north as Belle Isle. Alternative X-10 has two variations X-10A and X-10B.

Among the proposed alternatives evaluated located in the City of Detroit, Alternatives X-11, X-10B and X-10A are preferred with lesser impacts to current infrastructure than other alternatives in Detroit. These 3 alternatives are generally located north of West Jefferson between Campbell, Post south of Fort.

All of the proposed alternatives in Detroit city limits will require significant water distribution and sewer and outfall modifications to accommodate various proposed approach routes and plazas to new bridge locations. Costs allocated for such utility modifications for these alternatives range between \$143 million and \$183 million.

DWSD's future CSO facilities planned along the Detroit River are not considered in the DEIS. DWSD's future Summit CSO facility being finalized in our LTCSO Plan Amendment due to the MDEQ later this year will be located on portion of the Revere Copper property parcel adjacent the Campbell south of Jefferson will impact and may conflict with aspects of Alt. X-11. Similarly, our future Schroeder CSO facility will likely impact Alts. X-10A and X-10A.

With any of these alternatives between 324 and 414 residential dwelling displacements and between 43 and 56 business displacements are anticipated. The Delray community would be impacted if either of these preferred alternatives are implemented. U.S. dollar estimated cost for all alternatives range from \$1.2 billion to \$1.5 billion.

Questions on this review may be directed either to:

Mirza Rabbaig, Head Engineer
DWSD, CSO Control Group
rabbai@dwsd.org
313 964 9880

Gary Stoll, Sr. Asst. Mechanical Engineer
DWSD, CSO Control Group
stoll@dwsd.org
313 964 9883

Issued: March 15, 2008



STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

JENNIFER M. GRANHOLM
GOVERNOR

KIRK T. STEUDLE
DIRECTOR

February 21, 2008

Mr. Victor M. Mercado, Director
Detroit Water and Sewerage Department
735 Randolph Street
Detroit, Michigan 48226

Dear Mr. Mercado:

The enclosed Draft Environmental Impact Statement and Draft Section 4(f) Evaluation is transmitted for your review in compliance with the Council on Environmental Quality's "Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act."

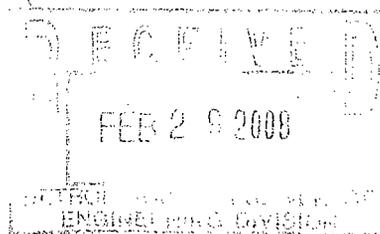
This document describes the social, economic, and environmental issues bearing upon alternative proposals for the Detroit River International Crossing, in Wayne County, Michigan.

Your comments on this Draft EIS will be considered and included in the Final EIS for this project. We would appreciate the return of your comments to this office by April 29, 2008.

Sincerely,

David W. Wresinski, Administrator
Project Planning Division
Bureau of Transportation Planning

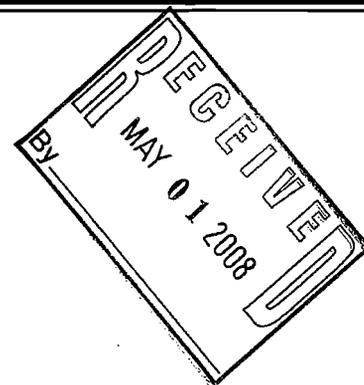
Enclosure(s)(1)



RECEIVED
FEB 28 2008
ENGINEERING DIVISION

DETROIT PUBLIC SCHOOLS

Facilities Management and Auxiliary Services
7305 Second Avenue, 10th Floor
Detroit, Michigan 48202
313-873-6532 (Phone) ■ 313-873-6482 (Facsimile)



April 29, 2008

Mr. David W. Wresinski, Administrator
Project Planning Division
Bureau of Transportation Planning
Department of Transportation
State of Michigan
P.O. Box 30050
Lansing, Michigan 48909

Sent via Fax: 517-373-9255; e-mail: wresinskid@michigan.gov; and U.S. Mail

**RE: Draft Environmental Impact Statement and Draft Section 4(f) Evaluation -
The Detroit River International Crossing Study**

Dear Mr. Wresinski:

The Detroit Public Schools (DPS or the District) appreciates the opportunity to provide comments on the "Draft Environmental Impact Statement and Draft Section 4(f) Evaluation for the Detroit River International Crossing Study" dated February 2008.

As you are aware, the following two schools will be impacted directly by the project:

- Beard Early Childhood Center, 840 Waterman – Interchange Area; and
- Southwestern High School - 6921 W. Fort Street – Plaza Area.

Southwestern HS is directly adjacent to each of the alternative locations and Beard ELCC will be directly impacted by increased traffic and widening of the I-75 service drive. The District is very concerned about how the construction and increased pollution will impact the health and safety of the over 1,100 students and staff on these two sites. In addition, the District operates three other schools (Western International High School, Earhart Middle School and Maybury Elementary School) which are within a block of the I-75 service drive and will also experience the negative impact of increased traffic and air pollution.

Our first and main concern, of course, is the health and safety of students and staff who daily attend all of the schools in the area of the proposed project. Secondly, we are

concerned about the ability of our schools to perform their essential function of educating students. Our comments are centered around these two concerns. In particular, the District alerts you to the following potential hazards and negative impacts from the project:

- Traffic hazards for students and staff safety traveling to and from school;
- Detrimental air quality effects from construction activities and from increased pollution;
- Increased noise during construction and from increased traffic and the plaza;
- Vibration effects on foundations and structures and the ability of students to concentrate and learn effectively;
- Increased emission and poor air quality emanating from portable bituminous and concrete plants during construction activities;
- Increased crime as a result of the concentration of traffic and commerce in the area;
- Necessity for redesigning school bus routes; and
- Reduced enrollment in schools (and consequently lower revenue for education) due to population out-migration.

In addition to the foregoing concerns, we raise the following questions regarding the findings of the Draft Environmental Impact Statement:

Section 3.6.4.2 Air Quality During Construction

This section addresses emission factors for earthmovers/graders only. It does not address the air quality impact of other types of equipment, such as bulldozers, cement trucks, delivery trucks, among others. All vehicles and equipment used in construction should be measured when determining the emission estimates of PM_{10} and $PM_{2.5}$.

Also, Section 4.6 states “Construction emissions may represent a large new source of $PM_{2.5}$ emissions”. How does this affect the general conformity requirements of the Clean Air Act?

At a minimum, the District requests that ultra-low sulfur diesel fuel be required during construction activities.

Section 3.6.5 Summary of Air Quality Impacts

The statement that “Southwestern High School would get more exposure from I-75 and Fort Street than it would from a new plaza” is ridiculous and unjustifiable! The drawings indicate that the plaza will be directly adjacent to Southwestern High School. The school will receive a steady and heavy stream of diesel particulates, among other air-borne contaminants.

Section 4.6 Control of Air Pollution during Construction

Dust control measures have not been defined. Will water trucks be utilized? Will street sweeping be included? How often will this be completed?

Section 4.17 Maintaining Traffic During Construction

This section does not address construction traffic. It is obvious that construction traffic will have a negative impact on the operation of school and the health and safety of students before and after school. The District requests that no construction vehicles be allowed on Fort and Post streets during school hours and the hour before and after school.

Mitigation of Negative Impacts

It is not the District's desire to oppose the project or stand in the way of what appears to be favored by this State, the Federal Government and our neighbors in Canada. Nevertheless, the District insists that the project be constructed and designed so as to mitigate against any potential risk to the health and safety of students and staff. It is not acceptable to permit any increases in pollution or particulate matter (even if they fall within EPA acceptable limits), especially in an area that has experienced higher than normal asthma levels. These impacts must be mitigated in some fashion. In addition, the traffic flow and project design must also incorporate measures to prevent any negative impact on the operation of our schools and the teaching and learning that occur there.

We recommend, among other things, that you consider incorporating the following into your Final Report:

- A. Noise barriers and vegetative buffering to reduce the noise from construction and traffic and to mitigate against dust;
- B. Increasing the distance between schools and the project and traffic;
- C. Providing a new air filtration system for Southwestern HS and Beard ELCC;
- D. Reducing diesel emissions by: implementing idle-reduction technologies and programs on the plaza and other areas; and by pursuing strategies to offset overall diesel emissions through retrofitting area truck fleets with diesel reduction technologies;
- E. Constructing an indoor recreation facility for the school so students have healthy access to recreation like students have in other areas;
- F. Installing an air monitor at the school to track and address problems;
- G. Preserving access to the school from the North to the South side of I-75, including keeping open the Springwells interchange and reconstructing pedestrian bridges over I-75;
- H. Conducting a baseline health study of students as well as annual health screenings to monitor the project impacts.

Again, we appreciate the opportunity to provide you with the above-referenced comments to the Draft Environmental Impact Statement for the Detroit River International Crossing. We look forward to reviewing and, if necessary, commenting on the Final report.

If you have any questions or comments, please feel free to contact me at 313-873-6532.

Sincerely,

A handwritten signature in black ink, appearing to read "Nathaniel V. Taylor". The signature is fluid and cursive, with a large loop at the end.

Nathaniel V. Taylor
Chief of Facilities Management and Auxiliary Services

cc: Connie K. Calloway, Ph.D., General Superintendent
Richard J. Schleyer, Ex. Director, Dept. of Environmental Health and Safety
Garnet Green, Principal, Southwestern High School
Brenda Phillips, Principal, Beard Early Childhood Center
Geraldo Vazquez, Earhart Middle School
Ellen Snedeker, Maybury Elementary School
Rebecca Luna, Western International High School

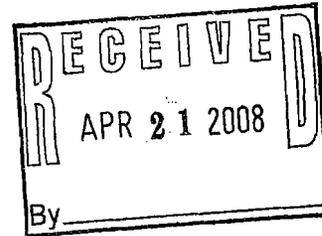
DETROIT PUBLIC SCHOOLS

Phoenix Multicultural Academy

7735 Lane

Detroit, MI 48209

(313) 849-2419



April 15, 2008

David Williams
Environmental Program Manager
Federal Highway Administration
315 West Allegan Street, Rm. 201
Lansing, MI 48933

David Wresinski, Administrator
Project Planning Division
Michigan Department of Transportation
P.O. Box 30050
Lansing, MI 48909

Dear Sirs:

Phoenix Multicultural Academy, which is located in Southwest Detroit and services, Pre-K-8 has many children who live in Delray and attend school. As principal and representative of approximately five hundred students, I have concerns regarding the DRIC Draft EIS report. My reasons are that some of these students who attend our school live in Delray and if this project moves forward, we will lose students and their families from this community and the City of Detroit

As educators we need to support our children along with their parents in requesting to stop the DRIC DRAFT EIS report from the timeline of the comment period and even from the hands of the DRIC committee. How can anyone accept this 6,000-page report knowing that there are families lacking the understanding of such a report?

Many families of our community have been hit the hardest due to not being fluent in English. These materials, or even substantive summaries of community impacts and proposed mitigation measures, have not been provided in Spanish or Arabic, making it extremely difficult for English-learners to participate in this process.

Therefore, we request that you put a stop to moving forward until this community understand the entire process through bi-lingual material (Spanish and Arabic), a more concise explanation of the DEIS and to give them sufficient time to review and comment on the information.

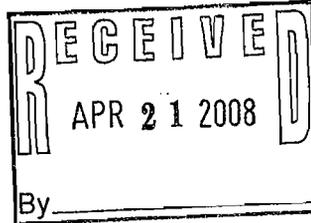
Sincerely,

A handwritten signature in black ink, appearing to read "Anna Rodriguez".

Anna Rodriguez, Principal

cc: Sen. Debbie Stabenow
Sen. Carl Levin
Congresswoman Carolyn Cheeks Kilpatrick

DETROIT PUBLIC SCHOOLS



Geraldo Vazquez
Earhart Middle School
1000 Scotten Street
Detroit, MI 48209

April 9, 2008

David Williams
Environmental Program Manager
Federal Highway Administration
315 West Allegan Street, Rm. 201
Lansing, MI 48933

David Wresinski, Administrator
Project Planning Division
Michigan Department of Transportation
P.O. Box 30050
Lansing, MI 48909

Re: Detroit River International Crossing ("DRIC"), Draft Environmental Impact Statement ("DEIS")

Dear Sirs:

We are writing to express our concerns about the Draft Environmental Impact Statement ("DEIS") for the above-referenced project that was recently released for comments. We believe that the DEIS either gives short shrift to or totally ignores air quality issues and the impact of the project on the health of the community. The DEIS should be withdrawn and reworked to better consider and document these issues so that we, the community, and other interested parties can comment on them.

The community selected for this new crossing is already inundated with heavy industry, including automotive factories, steel plants, oil refineries, and so on. Needless to say, the emissions from these facilities are in the hundred of thousands of tons per year and consist of some of the most toxic material around. The combined amounts of toxins in our estimation, as well as those of many scientists, are causing dangerous health problems and premature deaths of many residents in the area. Detroit is also one of the worst cities in the nation in terms of fine

DETROIT PUBLIC SCHOOLS

particle, or "soot", pollution, Fine particles have been linked to a wide variety of serious health impacts, from upper and lower respiratory ailments, such as asthma to heart attacks and strokes, including crib death in children.

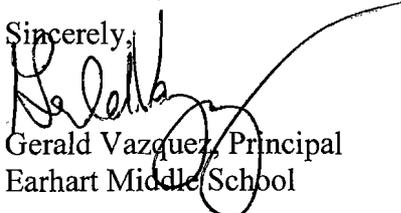
Indeed, Detroit asthma rates are some of the highest in Michigan. These exposures are found in the African-American, Hispanic, and low-income communities in the city compared to the surround Wayne County area and higher income areas in Michigan. In Southwest Detroit, for example, 1 in 5 children already suffer from asthma and African-American children are hospitalized for asthmas at a rate 4.2 times higher than white children.

The entire seven-county region of Southeast Michigan is in non-attainment for both 8-hour ozone and fine particulate standards. The potential impacts of increased freight traffic as a result of a new bridge crossing and the associated infrastructure (plazas and roads) needs to be studied very closely in terms of the region's already poor air quality standards.

The environmental justice analysis for the DRIC study has not been given the serious consideration it deserves, especially since the plaza for the bridge will be located near Southwestern High School. Exposure of diesel emissions to children has shown to cause serious health consequences, and it is inexcusable to issue a DEIS without considering these and other issues and simply saying "we'll think about that later."

We believe it is essential to have an Environmental Justice and Health Impact Study completed and available for comment in the DEIS. We hope you will agree that the air quality and the health of the community are among the most critical concerns related to a new border crossing.

Sincerely,


Gerald Vazquez, Principal
Earhart Middle School

cc: Sen. Debbie Stabenow
Sen. Carl Levin
Congresswoman Carolyn Cheeks Kilpatrick

M E M O R A N D U M

Webster Elementary School

1450 25th Street
Detroit, Michigan 48216
313-849-3709

David Williams
Environmental Program Manager
Federal Highway Administration
315 West Allegan Street, Rm. 201
Lansing, MI 48933

April 14, 2008

✓ David Wresinski, Administrator
Project Planning Division
Michigan Department of Transportation
P.O. Box 30050
Lansing, MI 48909

Dear Mr. Williams and Mr. Wresinski:

I am a teacher in the Southwest Detroit area of the Detroit River International Crossing. Our community requires information in both Spanish and English to be able to comment on the DRIC Draft DEIS.

Our school is located at the present entrance of the Ambassador Bridge. Our student population ranges from Pre-school to grade five. The age levels of our students are between three years old and twelve years old. The majorities of our parents speak and understand a language other than English.

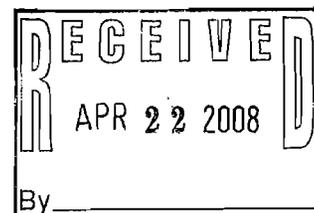
The Draft DEIS is 6,000 pages (including technical reports) of material that are not easily understood, even by those who grew up speaking and reading English. Many members of our communities hardest hit by the proposed crossing are not fluent in English. These materials, or even substantive summaries of community impacts and proposed mitigation measures, have not been provided in Spanish, making it extremely difficult for English-learners to participate in this process. The translators provided at public meetings are helpful, but insufficient to address this need- the issues are too varied and complex for translation the night of a meeting to make a difference. The burden should not fall on groups to fill the information void left by the agencies.

We respectfully ask that the agencies provide the community with, at the very least, substantive summaries of the community impact portions of the DEIS translated into Spanish and sufficient time to review and comment on the information.

Sincerely,


Patricia Champion

cc: Sen. Carl Levin
Sen. Debbie Stabenow
Congresswoman Carolyn Cheeks Kilpatrick

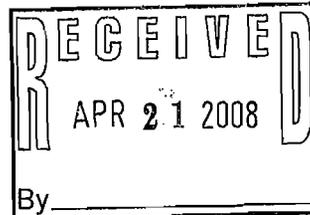


M E M O R A N D U M***Webster Elementary School***

*1450 25th Street
Detroit, Michigan 48216
313-849-3709*

David Williams
Environmental Program Manager
Federal Highway Administration
315 West Allegan Street, Rm. 201
Lansing, MI 48933

April 14, 2008



David Wresinski, Administrator ✓
Project Planning Division
Michigan Department of Transportation
P.O. Box 30050
Lansing, MI 48909

Dear Gentlemen:

I am an educator at Webster Elementary School, which is located in Southwest Detroit. I am writing to request a suspension of the DRIC Draft EIS process for more public evaluation of the location for another crossing.

Our school is located at the present entrance of the Ambassador Bridge. Our student population ranges from Pre-school to grade five. The age levels of our students are between three years old and twelve years old. We have first hand knowledge about the issue that surround a project of this stature.

I remember the construction of I-75 in the 1960s. This project also plowed over many black-owned business, social institutions, and jazz clubs and displaced many residents to large-scale public housing projects. It took away a historical part of the city called "Black Bottom".

Southwest Detroit and the Delray area has an amazingly diverse population, including Hungarian, Irish, Gypsy, Polish, Arab, African-American, Armenian, Asian, and Latino residents. The community is struggling to revitalize its homes and businesses in the face of long running neglect by the City of Detroit and the industrial zoning classifications that have been imposed on Delray.

I am very concerned that the new bridge being proposed by the Detroit River International Crossing (DRIC) partnership could further divide Delray and further suffocate the community's efforts to revitalize. This concern is most acute when one considers that a new bridge is not even necessary. The owners of the Ambassador Bridge have already acquired the land they need to expand the currently existing crossing- there is no reason to potentially destroy the community of Delray when another option already exists.

I am also concerned that the Draft EIS seems to recognize the diversity of Delray and that it is the community "which would have most direct effects from the proposed crossing." DRIC Draft EIS, at 3-6. But this study pays only lip service to the considerations and careful analysis afforded to such a community by the Environmental Justice policy in Executive Order 12898. This lip service is seriously flawed. It appears to me that your agencies believe Delray residents simply burn to the ground anyway. See ES-13 (No Build Alternative). This is an extremely offensive assumption to make. Your agencies are also assuming that the hundreds of displaced Delray residents can be "absorbed" by the Metro Detroit tri-county area. See ES-16. The DEIS, however, does not explain how a community that generally lives below the poverty line and lacks access to vehicles is suppose to move out to the suburbs because their home was torn down to make way for a bridge.

The Draft EIS states that another bridge will hurt both the minority and non-minority populations in Delray. That hardly is the point. The fundamental question should be whether putting a bridge in Delray, as opposed to some other community, has disproportionately adverse impacts on a minority population. The site selection process is essential to preventing environmental racism. Delray residents and community organizations should be afforded the opportunity to participate in a meaningful, transparent process.

Finally, it is also difficult to be expected to comment on a document that does not provide concrete information about significant potential impacts to the Delray community and provides only guesses as to the mitigation of those impacts. Delray must be provided with timely, complete information about significant impacts of this project on their daily lives (including increased exposures to noise, local transportation systems, relocation of families, destruction of church congregations, demolition of historic buildings and the impacts to air quality) as part of a rigorous assessment process.

I respectfully request that the Draft DEIS, be withdrawn so that these deficiencies can be addressed.

Sincerely,



Gladys Smith

cc: Congresswoman Kilpatrick
Sen. Stabenow
Sen. Levin

WAYNE STATE UNIVERSITY

April 17, 2008

David Williams
Environmental Program Manager
Federal Highway Administration
315 West Allegan Street, Rm. 201
Lansing, MI 48933

David Wresinski, Administrator
Project Planning Division
Michigan Department of Transportation
P.O. Box 30050
Lansing, MI 48909

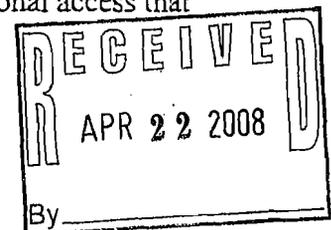
Re: Detroit River International Crossing ("DRIC"), Draft Environmental Impact Statement ("DEIS")

Dear Sirs:

In efforts to impact in a positive way the potential of our constituents in our communities, we believe that it is extremely important to take into effect any developments that may impact the long term educational, health, and safety of our future children, youth, and community members.

With this said, we are writing to express our concerns about the Draft Environmental Impact Statement (DEIS) for the above-referenced project that was recently released for comments. We believe that the DEIS falls short of understanding the short and long term effects not only on the quality of education, but most importantly health and safety of the Delray and surrounding communities in the Southwest Detroit region. We strongly urge for the DEIS to withdraw and reconsider the planning and implementation of this project and take into serious consideration the voice and issues expressed by this community and its constituents.

The community selected for this new crossing is already overburden with heavy industry, including automotive factories, steel plants, oil refineries, and among other industrial hazards. Needless to add, is the impact of life threatening emissions from these facilities. This is a serious health danger to the entire community and to those unborn children. As an educational institution we are also very concern since the results of this project will be a hindrance and add yet another stumbling block to the lack of educational access that this community so badly needs.



WAYNE STATE UNIVERSITY

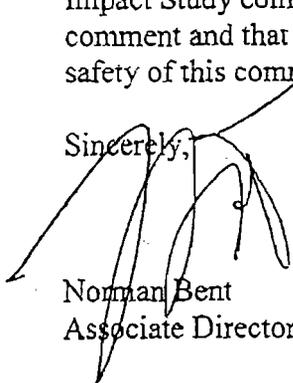
Because we also believe in the importance of diversity in its full meaning, we respectfully asked that in order to get a full understanding of what the community needs are that you provide translators and material that are considerate of the cultural diversity in this community. All materials published (questionnaires, flyers, brochures, etc.) should be published in Spanish, Arabic, and any other languages spoken so that communication is clear and expectations are very well understood.

Detroit is one of the worst cities in the nation in terms of fine particle, or "soot", pollution. Fine particles have been linked to a wide variety of serious health impacts, from upper and lower respiratory ailments, such as asthma to heart attacks and strokes including crib death in children. Given these environmental studies, it is sad to say that Detroit is among one of the highest in asthma rates in the country. These exposures are found in the African-American, Hispanic, and low-income communities in the city compared to the surrounding Wayne County area and higher income areas in Michigan. In Southwest Detroit, 1 in 5 children already suffer from asthma and African-American children are hospitalized for asthmas at a rate of 4.2 times higher than other white children.

With this said, we implore that you revisit the environmental justice analysis study for the DRIC, take into serious consideration what potential short and long term effects will this project have on the community, and most importantly the educational development of our future leaders-the kids. Economic progress is a necessity, especially during these economic downturns. However, it is also important that we do not jeopardize the livelihood of our community at the expense of development and progress.

We sincerely believe that it is essential to have the Environmental Justice and Health Impact Study completed, and available for the Southwest community and its partners to comment and that serious consideration be given to the issues surrounding the health and safety of this community.

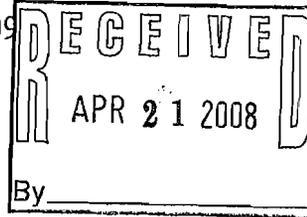
Sincerely,



Norman Bent
Associate Director, Operations

cc: Congresswoman Carolyn Cheeks Kilpatrick
Senator Debbie Stabenow
Senator Carl Levin

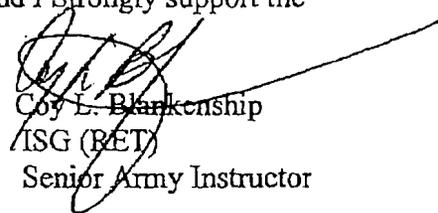
Western International High School
JROTC
1500 Scotten St.
Detroit, MI. 48209



4-16-2008

Dear Gentleman:

I am an employee in the Delray community at Western International High School. I am writing in support of not destroying the Delray community by using it as a bridge site this would surely disrupt a lot of people who are currently in dir straights, To have to relocate for them would be a disaster and would also disrupt the school enrollment which is a multicultural school and the majority of the students attending are located in the Delray community, I have had conversations with the Bridge Company and their proposal seems to make more sense than disrupting and entire community, I strongly urge you to consider the impact this would have on the Delray community and I Strongly support the Bridge proposal.



Coy L. Blankenship
ISG (RET)
Senior Army Instructor

cc: Senator Debbie Stabenow
Senator Carl Levin
Congresswoman Carolyn Cheeks Kilpatrick



C · H · A · S · S

Community Health & Social Services Center, Inc.
 5635 W. Fort • Detroit, MI 48209 • (313) 849-3920 • FAX: (313) 849-0824

April 29, 2008

Mr. Robert Parsons
 Michigan Department of Transportation
 PO Box 30050
 Lansing, MI 48909

**RE: COMMENTS ON DETROIT RIVER INTERNATIONAL CROSSING (DRIC)
 DRAFT ENVIRONMENTAL IMPACT STATEMENT**

Dear Mr. Parsons,

I am writing on behalf of the Board of Directors and the 13,202 unduplicated users of the Community Health and Social Services (CHASS) Center, Inc. CHASS is a not-for-profit organization that provides comprehensive health and social services to the uninsured and underinsured, with emphasis on the African American and Latino populations.

CHASS was established in 1970 after the closing of numerous community hospitals and the subsequent flight of physicians to more lucrative suburban practices. This left many neighborhoods in Detroit with limited access to health care services. Community leaders in Southwest Detroit were not only concerned about access to medical services and social service programs, they were also faced with the barrier of language. Much of the population then, as today, spoke Spanish as their primary language. An aggressive campaign was launched to bring much needed services to the neighborhood and it was out of these efforts and with support from the Governor's office, that CHASS was born.

Initially CHASS was a well-baby clinic with an annual budget of \$100,000. Today, CHASS provides comprehensive health and wellness services for people throughout the life cycle. The organization's annual budget is just under \$5 million. In 2007, CHASS served a total of 13,202 unduplicated patients at its three Centers: one in Southwest Detroit, one in Detroit's MidTown Community and a school-based health center inside Western International High School.

Now CHASS faces the dilemma of having too many patients and not enough space within its Southwest Center. Currently, CHASS is developing a replacement facility to be located next to our existing building, on land owned by the organization. It is anticipated that the new facility will open in 2010 and will enable CHASS to more than double the number of patients served. Since Southwest Detroit is the only sector of the City that is increasing in population, the expanded access to health care that will result from the new building is essential to maintaining the health of this community.

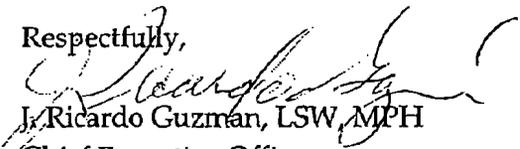
The Detroit River International Crossing, or DRIC, threatens the years of work that CHASS has invested in its future. All of the proposed alternatives will undoubtedly impact the Center and its patients. For example, in each alternative a number of cross connector streets are removed to make way for the new bridge. In a neighborhood with limited transportation options, this limits the ability to reach necessary services.

Alternative #5, however, mandates that CHASS would be relocated, delaying the planned construction and subsequent increase in medical services that our project will bring to Southwest Detroit and its residents. To that end, CHASS respectfully requests the following:

1. That Alternative #5 be removed from consideration, thus eliminating the threat of having to relocate our Center and delay expansion plans.
2. Insure easy access to comprehensive health services within the impacted area south of the I-75 freeway for all available means of transportation including vehicular, mass transit, and non-motorized modes.
3. Maintaining sidewalk and street connections for pedestrians and all forms of non-motorized transportation throughout the impact area and between the north and south sides of I-75 freeway. All connections including pedestrian overpasses would be at a distance of no more than one-quarter mile, which is the generally accepted normal walking distance.
4. Facilitate the improvement of commercial corridors within the impacted area to better accommodate increased traffic resulting from the bridge and enhance the streetscape, which has deteriorated as a result of the Gateway Project.
5. Insure continuous and rigorous monitoring of air quality to protect against increased air pollution that would exacerbate and increase the incidences of asthma in the community surrounding the proposed new bridge. The prevalence of this disease will certainly not be diminished with the increased diesel emissions that a new border crossing will release into the air. The State of Michigan has a responsibility to insure that no additional burden is placed upon an already vulnerable population.

In conclusion, we strongly urge MDOT to reject Alternative #5, insure accessibility for residents to our services and all services that will remain south of I-75 within the impact area, facilitate the improvement of surface streets and sidewalks, and mitigate foreseeable environmental impacts on the community.

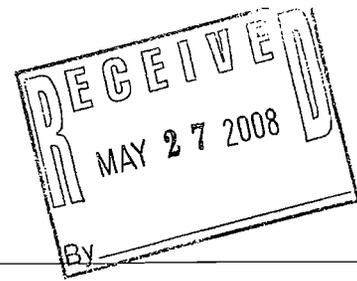
Respectfully,



J. Ricardo Guzman, LSW, MPH
Chief Executive Officer



DETROIT DEPARTMENT OF TRANSPORTATION
1301 EAST WARREN, DETROIT, MICHIGAN 48207
GENERAL INFORMATION: (313) 933-1300
OUTSIDE THE (313) AREA: 1-888-DDOT-BUS
MICHIGAN VOICE RELAY: 1-800-649-3777
WWW.CI.DETROIT.MI.US/DDOT



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

Dear Mr. Bob Parsons,

The Michigan Department of Transportation's (MDOT) Detroit River International Crossing (DRIC) Draft Environmental Impact Statement (DEIS) is an expansive overview of the problems plaguing the poverty stricken community of Delray and the forecasted assumptions of increased border traffic resulting in needed capacity improvements. It is assumed that without an investment of this magnitude our states economic prosperity will be hindered.

As a representative of the Detroit Department of Transportation there are many concerns that are brought forward when thinking holistically about the impacts of such a development in Southwestern Detroit. MDOT has taken strides to enhance the communities in Southwest (SW) Detroit by improving the existing Ambassador Bridge Plaza and truck traffic connectivity to I-75/I-96/I-94 and is providing a new pedestrian crossing within the corridor. Finally bringing needed congestion relief and neighborhood connectivity to the residents of SW Detroit after decades of truck traffic on local roads. A promising and encouraging project for residents in an area continuing to reinvent itself, and becoming more economically prosperous during a State recession.

Only two City of Detroit bus routes are listed as being affected by a project of this magnitude Route 11 and 30, but the ongoing construction would more than likely affect route 19 that utilizes Fort St. Of-course adjustments can be made to the routes affected.

Though there are not many routes impacted by this development, the displacement of low-income families (30%) and the multitude of zero car households (25%) are a concern. These demographics are a reflection of DDOT's typical rider and a project of this magnitude could have a massive impact on our ridership.

The DRIC DEIS proposes developing a whole new border crossing that eliminates multiple pedestrian crossings, displaces many low-income residents and businesses. This seems to be a poor solution to the border capacity problem. The existing infrastructure should be utilized to its fullest potential, there is know need for a whole new plaza and new interchange that will displace residents and hinder neighborhood pedestrian connectivity. The expenses that may be incurred by residents of the State of Michigan for this development are not sustainable within the current infrastructure. Clearly MDOT is attempting to once again use highway development as a tool for removing urban blight, and displacing many low-income and minorities in the Delray community. The local benefits of this project are minimal in comparison to the rest of the region so why would the bridge need to displace so many people and businesses in our city?

MDOT has made it public knowledge that billions of dollars are spent every year rehabilitating the current state highway, road and bridge systems. However, there is failing road and highway

infrastructure still throughout the region. This is not efficient or sustainable, and proposing developing a whole new bridge and plaza system is narrow-minded and shortsighted. Efficiency is key in developing solutions to infrastructure issues.

The enhancements MDOT is exploring with residents of Delray are also setting a precedence that will result in costly community benefits for future major developments. To allow a community to develop a Master Plan for themselves when the city already has a plan in place is misleading and inappropriate for residents. The State has overstepped it's boundaries because if the city rejects the proposed plan, then city officials are left with a poor perception for residents in Delray. Also if the city rejects the new plan, the time, money, and participation were a complete loss.

The beneficiaries of this development are the Canadian's, they had an increase in manufacturing jobs, many of which used to be in Michigan, and the study has eliminated the option for twinning the Ambassador Bridge. A public private partnership with the Bridge Company would have been the best solution for the City and State. The fact that Canada has not developed the Huron Church Rd to accommodate truck traffic is not the State of Michigan's problem or the City of Detroit's. Why would it be proposed that SW Detroit destroy a community regardless of it's socioeconomic level to accommodate Canadian requests? When the reasoning is the exact same that Canada has not developed Huron Church Rd and does not want the Ambassador twinned.

The issue of redundancy is important and homeland security is obviously on everyone's radar, but would it not be more difficult to defend and protect two separate structures and plazas covering a vastly greater land and river mass area, then consolidated facilities and coordinated crossings and plazas?

The continued development of manufacturing and highways in Southeast Michigan will only result in the continued transformation of Michigan into a giant truck stop. The amount of highways within Detroit already outweighs most major cities by a long shot. The focus should be on providing amenities/infrastructure to residents of southeast Michigan that attracts white, blue, and green collar jobs and less truck traffic.

The city of Detroit is transitioning into a diverse career hub a project of this magnitude will only hinder city progress.

Thank you for your time and if you have any questions please don't hesitate to contact Wesley King at (313) 833-9602, weskin@detroitmi.gov or myself at (313) 833-7670.

Sincerely,

A handwritten signature in cursive script that reads "Lovevett Williams". The signature is written in black ink and is positioned above the printed name and title.

Lovevett Williams
DDOT Interim Director

cc: Tim Roseboom, DDOT
Wesley King, DDOT

From: [REDACTED]
Sent: Tuesday, April 29, 2008 4:12 PM
To: [REDACTED]
Cc: ELgaaly, Hala; Sugarman, Shelly; Striffler, Scot
Subject: DRIC DEIS

Gentlemen,

We have completed our review of the DRIC DEIS and have no comments. We are still in the process of reviewing the public hearing transcripts, which we received today. Once we've completed that review we will complete the current Key Points form and forward it to you.

Thank you,
-Matt

Matthew S. Robertson
Bridge Management Specialist, Permits Branch
Bridge Administration Division / CG-5411
U.S. Coast Guard Headquarters
[REDACTED]
[REDACTED]

Bob Parsons - FW: NEPA Correspondence for Federally Sponsored Projects

From: "Bowman, William - East Lansing, MI" <[REDACTED]>
To: <parsonsb@michigan.gov>
Date: 3/12/2008 2:01PM
Subject: FW: NEPA Correspondence for Federally Sponsored Projects

From: Bowman, William - East Lansing, MI
Sent: Wednesday, March 12, 2008 1:59 PM
To: 'parsonsb@michigan.gov'
Subject: NEPA Correspondence for Federally Sponsored Projects

March 12, 2008

Mr. Robert Parsons
Public Involvement/Hearing Officer
Michigan Dept. of Transportation
PO Box 30050
Lansing, MI 48909

**RE: Draft Environmental Impact Statement and Draft Section 4(f) Evaluation
Detroit River International Crossing (DRIC) Wayne County, Michigan**

We have reviewed this comprehensive study of the proposed Detroit River International Crossing. We noticed that the correspondence we provided (see attachment) on August 19, 2005 was not included among those printed in Appendix F. This tends to suggest to our national office that a review by the Michigan Natural Resources Conservation Service office was not made. A great deal of time is dedicated by our office to study proposals as related to the National Environmental Policy Act. Not sure as to the procedure your office or the consultants use to decide what to include as correspondence but we hope that you will give consideration to our reviews in the future.

Sincerely,

William Bowman
NEPA Coordinator

STATE SOIL SCIENTIST



August 19, 2005

**United States
Department of
Agriculture**

Natural
Resources
Conservation
Service

Michigan State
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**RE: Detroit River International Crossing Study and Draft Environmental
Impact Statement (DEIS), Wayne County, Michigan, U.S.A.**

We have reviewed the DEIS for the Detroit River International Crossing Study. It is apparent that most if not all of the area is heavily developed. There is no potential that the alternatives described in this study will have a negative impact on prime or unique farmland.

Special attention, however, should be given to the possible movement of soil particles to surface waters as construction begins. The nature of the specific soils and the knowledge as to how easily they may erode is not available since this part of Wayne County was not included in the Soil Survey of Wayne County Area, Michigan. Such data may also tell how quickly surface contaminants can travel while attached to finer soil particles or how quickly soil infiltration may occur and threaten groundwater.

Thank you for this opportunity to comment on the DEIS.

JOHN A. BRICKER
State Conservationist

cc: Steve Olds, DC, NRCS, Ann Arbor, Michigan
Albert Jones, AC, NRCS, Flint, Michigan



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