

6. How Were Local, State and Federal Agencies and the Public Involved?

This Section includes the DEIS language followed by the Preferred Alternative discussion at the end of each subsection surrounded by a green outline, like that around this paragraph. Bold text highlights DEIS information that has been updated.

6.1 Coordination

The Michigan Department of Transportation (MDOT) has conducted various meetings to offer opportunities for public comment and participation during the DRIC study process. Almost 100 public meetings, hearings, and workshops have been held to facilitate public involvement. The methods used and information presented were guided by a Public Involvement Plan (Appendix J) established at the outset of the project and refined as it unfolded. Access to the study by a toll-free project hotline (1-800-900-2649), written comments through the project Web site (www.partnershipborderstudy.com), or by mail was available and encouraged through the study process. A DRIC Study Information Office is located at the Delray Community Center, 420 Leigh Street, in Detroit, which is open Monday, Wednesday, and Friday from 1:00 p.m. to 5:00 p.m. to provide information and answer questions about the project. Approximately 10,000 residences and businesses were sent mailings about each formal public meeting. In addition to the mailings, over a thousand fliers were handed out door-to-door in Delray and along the I-75 service drive north of the freeway for public meetings and workshops. Section 6.2 provides details on these public involvement activities.

6.1.1 Early Coordination

MDOT conducted an agency scoping meeting on August 31, 2005, at Cobo Hall in Detroit. The meeting, which was open to the public, provided the opportunity for federal, state, and local agencies to review and comment on the scoping document prepared to guide the study process. The Local Advisory Council (comprised of representatives of community groups and local elected officials) and the Local Agency Group (comprised of technical professionals from local governments) also participated in the meeting. Prior to it, a scoping packet was mailed to those invited or who requested it. Letters received in response to the DEIS are found in Appendix F.

6.1.2 Cooperating Agencies

The following federal agencies have agreed to be cooperating agencies for the project:

- U.S. Environmental Protection Agency;
- U.S. Army Corps of Engineers – Detroit;
- U.S. Fish & Wildlife Service;
- U.S. General Services Administration – Great Lakes Region;
- U.S. Coast Guard;
- U.S. Department of Homeland Security – U.S. Customs & Border Protection;
- and,
- U.S. Department of State.

Cooperating agencies have special authority or expertise over the implementation of a project. Their participation is provided for by the Council on Environmental Quality regulations implementing the National Environmental Policy Act. Each has reviewed and approved release of this document in its role as a cooperating agency.

6.1.3 Agency Meetings

In addition to the scoping meeting, several other meetings were held with federal and state agencies. Details regarding the meetings are listed in Table 6-1. These meetings were held consistent with the commitment by FHWA and MDOT to continuous cooperation throughout the DRIC Study. These meetings assisted in gaining approval on the scoping document, Illustrative Alternatives, the Practical Alternatives and the Draft Environmental Impact Statement.

Table 6-1
Agency Meetings
Detroit River International Crossing Study

| Date | Location | Purpose/Topics of Discussion |
|-------------------|-----------------|---|
| April 27, 2005 | Detroit | Project update with technical representatives of local governments. |
| May 18, 2005 | Detroit | Involve the U.S. Cooperating Agencies in the Detroit River International Border Crossing Study. |
| July 20, 2005 | Detroit | Project update with technical representatives of local governments. |
| August 18, 2005 | Detroit | Project coordination with SEMCOG in regard to their travel demand modeling. |
| October 19, 2005 | Detroit | Project update of U.S. Cooperating Agencies with emphasis on Illustrative Alternatives |
| November 18, 2005 | Cleveland | Determine needs of the U.S. Coast Guard as they related to a new crossing of the Detroit River. |
| December 19, 2005 | Detroit | Project update with U.S. Customs and Border Patrol on Plaza location. |
| December 20, 2005 | Detroit | Project update with U.S. Army Corps. |
| January 9, 2006 | Conference Call | Project update and coordination with U.S. Customs and Border Protection. |
| January 25, 2006 | Detroit | Project update with technical representatives of local governments. |
| February 17, 2006 | Detroit | Project update with U.S. Customs and Border Protection. |

Table 6-1 (continued)
Agency Meetings
Detroit River International Crossing Study

| Date | Location | Purpose/Topics of Discussion |
|-------------------------|------------------|--|
| February 21, 2006 | Lansing | Project update of U.S. Cooperating Agencies with emphasis on Illustrative Alternatives Evaluation of Practical Alternatives. |
| February 23, 2006 | Detroit | Project update of U.S. Cooperating Agencies with emphasis on Preliminary Practical Alternatives. |
| February 24, 2006 | Washington, D.C. | Project update with U.S. Customs and Border Protection. |
| March 8, 2006 | Detroit | Project update with the Detroit Department of Environmental Affairs with a focus on the right-of-entry requests to the City for the geotechnical/drilling program. |
| April 26, 2006 | Detroit | Project update with technical representatives of local governments. |
| May 17, 2006 | Lansing | Project update with the State agencies. |
| May 31, 2006 | Detroit | Project update with technical representatives of local governments. |
| June 13, 2006 | Detroit | Project update of U.S. Cooperating Agencies with emphasis on the drilling program and social/cultural workshops. |
| September 12, 2006 | Detroit | Project update of U.S. Cooperating Agencies and State agencies with emphasis on the drilling program, Context Sensitive Solution workshops. |
| September 13, 2006 | Windsor | Update the Coast Guard and others on Practical International Crossing Alternatives. |
| September 25, 2006 | Lansing | Project coordination and guidance from the State Historic Preservation Office. |
| December 5, 2006 | Detroit | Project update of U.S. Cooperating Agencies and State agencies with emphasis on preliminary project impacts; deep drilling program; and, results of Context Sensitive Solution workshops. |
| March 14, 2007 | Detroit | Project update of U.S. Cooperating Agencies and State agencies with emphasis on deep drilling program; Value Planning results; and, Bridge-type Study. |
| May 17, 2007 | Detroit | Update officials at the Detroit Economic Growth Corporation on land use planning that has been done in conjunction with the Delray community. |
| June 7, 2007 | Conference Call | Project update with U.S. Customs and Border Protection and the General Services Administration. |
| June 13, 2007 | Detroit | Project update of U.S. Cooperating Agencies and State agencies with emphasis on Screening of Practical Alternatives; deep drilling program; Bridge-type Study; CBP/GSA coordination; and, Delray land use. |
| September 19, 2007 | Detroit | Project update of U.S. Cooperating Agencies and State agencies with emphasis on review of Technical Reports |
| October 22, 2007 | Lansing | Resolved issues regarding the <i>National Register</i> eligibility of certain properties/districts, and addressed other project-related issues with the SHPO. |
| October 29, 2007 | Conference Call | To exchange information related to possible mitigation efforts at Fort Wayne with the SHPO, Detroit Recreation Department and the National Parks Service. |
| October 30, 2007 | Lansing | Project update and coordination of project activities with the U.S. Department of Homeland Security. |
| December 12, 2007 | Detroit | Project update of U.S. Cooperating Agencies and State agencies with emphasis on Technical Reports and DEIS. |
| <i>February 7, 2008</i> | <i>Detroit</i> | <i>Project update of U.S. Cooperating Agencies and State agencies with emphasis on the DEIS document and public release schedule.</i> |
| <i>May 21, 2008</i> | <i>Detroit</i> | <i>Project update of U.S. Cooperating Agencies and State agencies with emphasis on comments received on the DEIS and continued analysis of the Practical Alternatives.</i> |
| <i>July 23, 2008</i> | <i>Detroit</i> | <i>Project update of U.S. Cooperating Agencies and State agencies with emphasis on issues related to identifying a Preferred Alternative and mitigation measures under development.</i> |
| <i>October 15, 2008</i> | <i>Detroit</i> | <i>Project update of U.S. Cooperating Agencies and State agencies with emphasis on selection of a Preferred Alternative and the preliminary schedule for producing the final EIS.</i> |

6.2 Public Workshops and Meetings

Engaging the public during the development of the DEIS involved a series of workshops and formal public meetings. Approximately 10,000 residences and businesses were sent mailings about each formal public meeting. In addition to the mailings, more than a thousand fliers were handed out door-to-door in Delray and along the I-75 service drive north of the freeway for public meetings and workshops. Selected display advertisements and media advisories were also posted in the following newspapers:

- Detroit Free Press
- Detroit News
- Latino Press
- Arab American News
- Michigan Chronicle
- News-Herald Downriver

Additionally, early in the DRIC, when the study area ranged from Wyandotte to Belle Isle, radio advertisements on Detroit's principal stations were used to help promote awareness of the milestone public meetings and public hearings.

A DRIC Workshop



Source: The Corradino Group of Michigan, Inc.

6.2.1 U.S. Public Workshops

The following is a list of DRIC Study Workshops and the principal content of each:

| Date | Focus |
|--------------------------|---|
| December 14, 2005 | Vision Statement |
| December 21, 2005 | First Step to Plaza Location |
| January 4, 2006 | Final Vision Statement and Presentation of Preliminary Plaza Locations |
| January 18, 2006 | Proposed Plaza Locations and Work Station "Q and A" |
| February 8, 2006 | Proposed Plazas with Preliminary Tie to Bridges and I-75 |
| February 27, 2006 | Land Use Goals |
| March 8, 2006 | Community Analysis |
| March 22, 2006 | Community Planning |
| April 19, 2006 | Context Sensitive Solution Terminology/Process |
| May 9 & 10, 2006 | Social and Cultural Issues |
| May 23, 2006 | Illustrative Land Use Plans |
| June 22, 2006 | Bus Tour to View Toledo and Port Huron Bridges |
| August 24, 2006 | Ramp/Plaza Concepts/Aesthetics |
| November 2 & 15, 2006 | Initial Bridge Concepts/Aesthetics |
| April 26, 2007 | Land Use/Urban Design/Crossing System Aesthetics |
| August 8, 2007 | Bridge Aesthetics |
| <i>December 12, 2007</i> | <i>Reviewed Context Sensitive Solutions and conceptual land use planning begun in December 2005 and cultural resources work addressing significant historic resources</i> |

Notes of all workshops are on the project Web site (www.partnershipborderstudy.com).

6.2.2 U.S. Formal Public Meetings

The list of DRIC Study public meetings and the purpose of each follows.

- April 2005 Public Meetings – April 11 at Biddle Hall in Wyandotte, April 12 at River Rouge High School in River Rouge, April 13 at Southwestern High School in Detroit, and April 14 at Martin Luther King Jr. High School in Detroit.
 - Introduced the project and solicited input on where the Illustrative Alternatives should or should not go. Public input was used to define evaluation criteria and develop Illustrative Alternatives.
- June 2005 Public Meetings – June 27 at Martin Luther King, Jr. High School in Detroit, June 28 at Southwestern High School in Detroit, June 29 at River Rouge High School in River Rouge, and June 30 at Crystal Gardens in Southgate.
 - Explained the Illustrative Alternatives and received input. The community was involved in weighting evaluation criteria. The Illustrative Alternatives were then refined prior to evaluation. More than 900 people participated.
- December 2005 Public Meetings – December 5 at River Rouge High School in River Rouge, December 6 at old HomeQuarters (HQ) in Southgate, December 7 at Southwestern High School in Detroit, and December 8 at Butzel Family Center in Detroit.
 - Reviewed the Illustrative Alternatives evaluation results. Public input led to working with the Delray/Southwest Detroit community to establish the area within which the proposed plaza would be located. The eight workshops listed on the previous page, held between December 14, 2005, and March 22, 2006, fulfilled that objective.
- March 2006 Public Meeting – Delray Community Center and Southwestern High School.
 - Presented the Practical Alternatives. The Practical Alternatives were refined based on the public input received.

A DRIC Formal Public Meeting



Source: The Corradino Group of Michigan, Inc.

- December 5, 2006 – Southwestern High School.
 - Discussed preliminary results of analyses of potential impacts of the Practical Alternatives. Public input received allowed further refinement and evaluation of the Practical Alternatives.

- January 11 and 31, February 28, March 21 and 28, 2007 – Delray Community Center.
 - Reviewed the DRIC deep drilling program to test for the location of brine well cavities. These meetings allowed the local community to be fully aware of all field work and to have questions answered by a team of field representatives.

- April 25, 2007 – Southwestern High School.
 - Concluded discussion of DRIC deep drilling program and explained the next steps in the analysis process, which would lead to a conclusion to be released to the public in the DEIS.

- June 20, 2007 – Southwestern High School.
 - Reviewed the screening of Practical Alternatives. Public input received allowed refinements to the alternatives and addition of Alternative #16 to better address local access considerations.

Prior to and after the DRIC public hearings, held on March 18 and 19, 2008, over two dozen meetings were held to brief individuals/organizations on the Draft Environmental Impact Statement (Table 6-2). This included those in the Governor’s office, the State Legislature, the staffs of Michigan’s Congressional Delegates, mayors of various cities in the region and a host of boards/commissions/agencies. The public hearings on the DEIS were held on March 18, 2008, at Southwestern High School (6921 West Fort Street) and on March 19, 2008, at LA SED (7150 West Vernor Highway). The public hearings were held following formal notice of availability of the DEIS and all supporting technical reports on February 29, 2008. The hearings were conducted, as most DRIC public meetings, as a combination “open forum/formal presentation/open microphone format.” The open forum allowed the public to stop in anytime during the scheduled hours, gather facts on the study, and speak with members of the MDOT Team on a one-to-one basis. MDOT presented a summary of the Draft Environmental Impact Statement (DEIS) during the formal presentation followed by an opportunity for all to hear public comments and questions in the open microphone portion of the meeting.

*Table 6-2
DEIS Briefings
Detroit River International Crossing Study*

| <i>Date</i> | <i>Organization</i> |
|--------------------------|---|
| February 19, 2008 | Governor's Staff |
| February 20, 2008 | State Legislature |
| February 20, 2008 | City of Detroit Mayor's Office |
| February 21, 2008 | Detroit Planning Commission |
| February 22, 2008 | SEMCOG |
| February 25, 2008 | Detroit Chamber of Commerce Representatives |
| February 25, 2008 | Detroit City Council, Public Health & Safety Standing Committee |
| February 26, 2008 | Dearborn Mayor, City Council & Planning Commission |
| February 28, 2008 | Wayne County Executive |
| February 28, 2008 | Congressional Delegates/Staff |
| March 3, 2008 | Automation Alley |
| March 4, 2008 | River Rouge Mayor and City Council |
| March 5, 2008 | Melvindale City Council and Mayor |
| March 6, 2008 | Oakland County Board of Commissioners |
| March 6, 2008 | Wayne County Commission |
| March 7, 2008 | Oakland County Executive |
| March 10, 2008 | Ecorse Mayor and Department Heads |
| March 11, 2008 | Macomb County Board of Commissioners |
| March 11, 2008 | Allen Park Mayor, City Council & Planning Commission |
| March 11, 2008 | Monroe County Commission |
| March 14, 2008 | Detroit Chamber of Commerce, Transportation Committee |
| March 25, 2008 | Oakland Co Traffic Improvement Assoc. |
| March 25, 2008 | Ecorse City Council (Mayor H. Worthy) |
| April 9, 2008 | St. Clair County Transportation Study (SCCOTS) |
| April 16, 2008 | Genesee Co. Board of Commissioners, Community & Economic Development Committee |
| April 16, 2008 | Washtenaw Area Transportation Study |

Court reporters were available to record oral comments at any time during the hearing. Citizens could also fill out a comment form and deposit it into the comment boxes at the public hearing site. Comments also were submitted through the project Web site (www.partnershipborderstudy.com) using the on-line comment form. They also were mailed, faxed and emailed. The public record for comments was open until May 29, 2008, which included a 30-day extension, as requested.

All written or recorded comments appeared in a transcript of the public hearing. A copy of the complete transcript, including all written and recorded oral comments received, was made available for public review at the locations listed in the Foreword of this FEIS.

In response to several comments on the DEIS, a meeting was held at Holy Redeemer Church on May 20, 2008. All materials were presented in Spanish. The oral presentation and question/comment exchange was translated into Spanish.

Notes of all formal public meetings, including the one on May 20, 2008, are on the project Web site.

6.3 U.S. Local Advisory Council (LAC) and Local Agency Group (LAG)

In addition to the series of public workshops and meetings, the DRIC Local Advisory Council (LAC) and the Local Agency Group (LAG) were formed. The LAC is made up of various elected officials, interest groups, and community representatives. It is a representative form of public involvement that involves members bringing ideas and concerns of their respective constituents to the table for discussion. In turn, LAC members communicate results of those discussions to their groups.

The DRIC LAC/LAG



Source: The Corradino Group of Michigan, Inc.

The Local Agency Group (LAG) was formed to have technical professionals from area governments, directly or indirectly affected by the DRIC proposal, engage in the study process. While held separately for the first year of the project (2005), LAG meetings were consolidated with those of the LAC after that.

In March 2006 and November 2006 the LAC met jointly with the Canadian Community Consultation Group. The purpose of the meetings was to review the Practical Alternatives and the preliminary impact data before the public meetings on these topics.

The LAC/LAG meets on the last Wednesday of each month, unless otherwise announced. Each meeting is open to the public and includes two public comment periods. Each formal public meeting presentation was pre-screened at the LAC/LAG and refined based on their input. Additionally, monthly input was used to shape the study process, respond to issues and conduct analyses to satisfy the community's

interest in the project. Organizations participating in the DRIC Local Advisory Council are listed in Appendix H. Those invited to the LAG also are listed in Appendix H.

Notes of all LAC/LAG meetings are on the project Web site (www.partnershipborderstudy.com).

6.4 Other Meetings and Public Involvement

6.4.1 MDOT Real Estate Meetings with Property Owners in the DRIC Study Area

Residents who are within the DRIC Study area footprint (see Figure 3-9) received a letter in early July 2007 inviting them to attend open houses held at the Delray Community Center on July 30 and 31 and August 1 and 2 from 10 a.m. to 8 p.m. Owners/tenants were briefed on their rights and benefits, if they are relocated as part of the DRIC project. Information on the project and real estate procedures was available. MDOT did not engage in any discussions of property purchase.

One-on-one meetings were held with about half the property owners/tenants on these four days. Additional meetings were held on an as-requested basis. These meetings took place as part of the preparation for the DEIS. Results are documented in MDOT's files.

MDOT also interviewed all businesses owners/operators, usually at their place of business.

6.4.2 Meetings of Legislative Committees

The House Transportation Committee (Rep. Philip LaJoy, Chair) and Senate Transportation Committee (Sen. Judson Gilbert, Chair) conducted joint sessions on March 23 and 30, 2006, and on May 11 and 18, 2006, in Lansing regarding the Detroit River International Crossing (DRIC) Study.

These meetings were open to the public. All meeting results were reported on the project Web site (www.partnershipborderstudy.com).

Hearings were held by the Michigan House of Representatives Appropriations Transportation Subcommittee on May 12 and 19, 2008, in Detroit, and June 10, 12, and 26, 2008, in Lansing. The Michigan Senate DRIC Ad Hoc Committee held hearings on August 15 and 27, 2008. These hearings were open to the public.

6.4.3 Other Public Involvement

The public involvement process has involved many small group/one-on-one meetings requested by the public. These have included meetings with city councils, chambers of commerce, trucking companies, owners and operators of potentially-impacted businesses, public agencies, and other groups.

The project Web site (www.partnershipborderstudy.com) includes information on meeting notes and reports. Information also is provided on contacting the project team and being added to the project mailing list. There is also a toll-free telephone system (1.800.900.2649) through which a caller can make comments or ask questions about the project.

A DRIC Study Information Office is located at the Delray Community Center, 420 Leigh Street, in Detroit. It is open Monday, Wednesday, and Friday from 1:00 PM to 5:00 PM to provide information and answer questions about the project.

6.4.4 Boat and Bus Tours

On September 28, 2005, a boat tour was conducted of the study area on both sides of the Detroit River. The tour examined different potential river crossing areas and the impacts they might have. The tour was open to agencies, LAC members, and the public.

On June 22, 2006, a bus tour examined bridges in Toledo, Ohio, and Port Huron, Michigan. This tour also was open to agencies, LAC members, and members of the public.

September 28, 2005, Bus Tour



Source: The Corradino Group of Michigan, Inc.

6.5 Coordination with Native American Groups

Early coordination letters were sent to the 12 federally-recognized Tribes of Michigan. They were invited to Section 106 consultation on the undertaking and any potential impacts to their respective Traditional Cultural Properties. Three Tribes responded including the Match-E-Be-Nash-She-Wish Band of Potawatomi Indians (Gun Lake Tribe), the Pokagon Band of Potawatomi and the Hannahville Indian Community. None of these Tribes identified any known Traditional Cultural Properties within the Area of Potential Effect for this undertaking (see correspondence in Appendix F of the DEIS).

The Pokagon Tribe sought to consult regarding treaty rights for open border crossings by Native Americans and Canadian First Nations people. FHWA deferred to the Department of Homeland Security and U.S. Customs and Border Protection regarding consultation on this subject as it was deemed to be outside the boundaries of the DRIC undertaking. FHWA indicated its limits of authority had been reached with the Pokagon Band on rights to open border crossings.

Both the Hannahville Indian Community and the Gun Lake Tribe asked to be consulted should any Native American historic sites or burials be discovered. No prehistoric or historic Native American sites were discovered during the archaeological surveys.

It is agreed, however, in the event of accidental discovery of Native American human remains during construction, that these two Tribes will be contacted for consultation in accordance with the appropriate federal and state laws, rules and regulations regarding such finds.

An “unanticipated finds” plan will be developed to provide detailed procedures to deal with significant historic resources which may be identified during project implementation. This plan will establish procedures to evaluate and treat these resources. The procedures include stopping work, examining findings, determining eligibility and documenting results.

6.6 City of Detroit Meetings

In order to identify all elements of the Preferred Alternative, monthly Local Advisory Council/Local Agency Group meetings in June, July, August and September 2008 were dedicated in large part to discussions about those elements. Additionally, meetings were held with various City of Detroit agencies to move to identification of a Preferred Alternative (Table 6-3).

*Table 6-3
City of Detroit Consultation
Detroit River International Crossing Study*

| <i>Date</i> | <i>Organization</i> |
|---------------------------|---|
| <i>July 31, 2008</i> | <i>Update the City on preferred alternative and open a dialogue on elements of that preferred alternative, leading to further meetings with City Departments.</i> |
| <i>August 12, 2008</i> | <i>Update to City Planning Commission</i> |
| <i>August 21, 2008</i> | <i>Update to Detroit Economic Growth Corporation, Planning and Development, and Parks and Recreation Department</i> |
| <i>September 4, 2008</i> | <i>Update to City Department of Public Works, Public Lighting Department, and Water and Sewage Department.</i> |
| <i>September 16, 2008</i> | <i>Continue dialogue with Detroit Recreation Department regarding mitigation for impacts to city parkland</i> |
| <i>September 23, 2008</i> | <i>Continue dialogue with Detroit Water and Sewage Department regarding impacts</i> |
| <i>September 25, 2008</i> | <i>Update to Detroit Department of Transportation regarding impacts to city transit system</i> |
| <i>September 29, 2008</i> | <i>Update to Detroit Department of Environmental Affairs regarding impacts to the former Detroit Coke site</i> |
| <i>October 6, 2008</i> | <i>Continue dialogue with Detroit Recreation Department regarding mitigation for impacts to city parkland</i> |

6.7 Public Hearings, Public Comments and Responses

The public hearings on the DEIS for the DRIC were held in accordance with federal and state public involvement/public hearing procedures. The public hearings took place from 5:00 p.m. to 8:30 p.m. at two locations in Southeast Michigan on March 18 and 19, 2008. A formal presentation at 6:30 p.m. was followed by an opportunity for all to hear public comments and questions. Hearing dates and locations were:

- March 18 at Southwestern High School, 6921 W. Fort Street, Detroit.***
- March 19 at LA SED Gymnasium, 7150 W. Vernor, Detroit.***

During the 90-day comment period, the study team received ten letters from resource agencies; six letters from local government agencies; one letter from a social service agency; seven letters from public schools and universities; 14 letters from advocacy groups and local organizations; five letters and comment forms from businesses; nine letters from federal and state lawmakers; 18 e-mails, faxes, and mailed letters from the public; and 11 messages received via the study Web site. A total of 270 people attended the hearings, with 15 speaking publicly

and five speaking in private to a court reporter. MDOT also received 15 comment forms and letters at the hearings.

Legal notices in English announcing the hearing were placed in the:

- **February 27, 2008, issue of The Michigan Chronicle;**
- **February 28, 2008, issue of the Latino Press;**
- **February 27 and March 12, 2008, issues of the Detroit News and Detroit Free Press;**
- **March 1, 2008, issue of the Arab American News;**
- **March 2, 2008, issues of the News-Herald Newspapers (Downriver);**
- **March 9, 2008, issue of the Michigan Citizen; and,**
- **March 13, 2008, issue of the Ecorse Telegram News.**

Additionally, translated versions (Spanish and Arabic, according to the medium's conditions) of the hearings notice were included in the March 13, 2008, issue of the Latino Press and the March 15, 2008, issue of the Arab American News. The initial deadline for comments was April 29, 2008. In response to requests, FHWA granted a 30-day extension to May 29, 2008.

Full copies of all comments (including the public hearing transcript) can be reviewed at the locations listed in the preface to this FEIS and on the project Web site, www.partnershipbordercrossing.com.

The following pages represent comments received from the general public and a number of organizations. They are organized by category in Table 6-4.

It should be noted that a commenter often had multiple comments or issues.

Comments received from important stakeholders, agencies and government entities are treated separately in Appendix F.

*Table 6-4
Comment Categories and Subcategories and Abbreviations
Detroit River International Crossing Study*

| <u>Comment Category</u> | <u>Abbreviation</u> | <u>Comment Category</u> | <u>Abbreviation</u> |
|----------------------------|---------------------|-----------------------------------|---------------------|
| Process | P | Jobs | I Jobs |
| Time extension | Time | Land Use | I Land |
| | | Noise/vibration | I Noise |
| P & N | PN Gen | Pedestrian/bicycle access | I Ped/Bike |
| Capacity | PN Cap | Property value | I Prop value |
| Connectivity | PN Con | Relocation/housing | I Reloc |
| Economic security | PN Econ Sec | Section 4(f) - parks | I Sec 4f |
| Forecasts | PN Fore | Access to Ft. Wayne | I Sec 4f Wayne |
| National and civil defense | PN Defense | Section 106 - historic | I Sec 106 |
| Operations | PN Oper | Security | I Security |
| Redundancy | PN Redun | Stormwater/utilities | I Storm |
| | | Tax base loss | I Tax |
| Alternatives | A Gen | Traffic | I Traf |
| Ambassador Bridge twinning | A AB | Access to/from I-75 | I Traf to 75 |
| Bridge type | A Bridge | Access across I-75 | I Traf over 75 |
| Crossing X-10 | A X-10 | Transit | I Transit |
| Crossing X-11 | A X-11 | Visual | I Vis |
| Illustrative | A Illus | Welcome Center | I Wel |
| Interchanges | A Inter | | |
| Ownership | A Own | Mitigation | M Gen |
| Partnership | A Part | Air quality | M AQ |
| Plazas | A Plaza | Buffer | M Buffer |
| Practical | A Prac | Community Benefits Package | M Benefits |
| Preferred | A Pref | Construction | M Cons |
| | | Context sensitive design | M CSS |
| Impacts | I Gen | Cultural | M Cul |
| Air | I A Gen | Housing | M House |
| Burden | I A Bur | Infrastructure plan | M Infra |
| Concentrations | I A Concen | Jobs | M Jobs |
| Conformity | I A Conform | Lighting | M Light |
| Health risk/exposure | I A Health | Noise | M Noise |
| Monitoring | I A Mon | Noise monitoring | M Noise mon |
| PM2.5 | I A PM2.5 | Permits | M Permits |
| Standards | I A Stand | | |
| Toxics | I A Toxics | Public/agency Involvement | Pub Gen |
| Benefits | I Ben | Cooperating agencies | Pub Coop |
| Business - local | I Bus | Governance | Pub Gov |
| Community cohesion | I Cohes | Meetings | Pub Meet |
| Contamination | I Contam | Notification | Pub Notif |
| Cost/funding | I Cost | | |
| Economic analysis | I Econ | Editorial | Edits |
| EJ | I EJ | Engineering | Eng |
| Fish & Wildlife | I F&W | Schedule | Sched |
| Indirect and cumulative | I ICE | Translations/non-English Outreach | Transla |
| | | Not a Comment or not Applicable | NA |

DRIC Comments on DEIS and Responses

| Response Category | Comment | Response |
|-------------------|--|--|
| A AB | p ES-5 indicates the No Build Alternative includes the proposed six-lane replacement of the existing Ambassador Bridge. Do the Build Alternatives in[clude] this bridge as well? . . . This project . . . should . . . be included as part of the analysis, particularly with respect to indirect and cumulative impacts. | Because that replacement span is only a proposal, not part of the Existing Plus Committed System, it is not part of the No Build Alternative. Nonetheless, the possibility that the replacement span of the Ambassador Bridge could be built was considered under indirect and cumulative impacts (Section 3.14 of the DEIS and FEIS). |
| A AB | 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 | As stated in Section 1 of the DEIS and FEIS, "A second bridge alongside the Ambassador Bridge would serve as a reasonable and secure crossing option for the border transportation network only in so far as it may provide a means of addressing an incident on one of the crossings themselves. An incident on either plaza or freeway connection in either country would affect operations on the crossing system. A new crossing at a different location . . . would provide a second, distinct crossing system and a greater degree of redundancy." Additionally, the Canadian Border Services Agency has indicated repeatedly to the Ambassador Bridge that the Canadian plaza must be expanded so it will be 120+/- acres. This will require acquisition of property. So, the DIBC does not own all the property needed for its proposed enhancement project. |
| A AB | We recommend in the strongest terms possible that the Administration accelerate its efforts both in the United States and through its dialogue with Canada, to follow the direction of Congress and ensure the construction of the second span of the Ambassador Bridge. | The NEPA document on the proposed replacement span of the Ambassador Bridge now being reviewed is under the control of the U.S. Coast Guard that is part of the U.S. Department of Homeland Security, not the Department of Transportation. |
| A AB | DRIC never made or attempted to incorporate them [Detroit International Bridge Company] in this study . . . based upon DRIC[’s] own study . . . "twin[ing]" the bridge is needed, the exist[ing] structure is at the end of it[s] useful life, further, [it] was never designed to carry the loads it now must carry, there is room for two bridges. | Building a replacement span of the Ambassador Bridge as an outcome of the DRIC study was considered in the Illustrative Alternatives Analysis phase, but dropped. See Section 2.1 and Volume 1 : Summary, Evaluation of Illustrative Alternatives on U.S. Side of Border - Technical Report. The permission to build a replacement span of the Ambassador Bridge as proposed by the Detroit International Border Crossing is under review by the U.S. and Canadian federal governments. |
| A AB | The beneficiaries of this development are the Canadian’s . . . The fact that Canada has not developed Huron Church Road . . . 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 . . . when . . . Canada has not developed Huron Church Road. . . | The alternative evaluation process took into account both benefits and impacts on an end-to-end basis involving both nations. |
| A AB | DIBC and CTC will construct the Ambassador Bridge replacement span as soon as they receive regulatory approval. . . At this point, the only things standing in the way . . . are regulatory approvals in the U.S. and Canada. In Canada, these approvals must be obtained from the same federal agency that is now forcefully advocating the DRIC project, and which has explicitly rejected the Ambassador Bridge as an alternative to the proposed new crossing. | The proposed replacement span of the Ambassador Bridge is being reviewed by Transport Canada and Windsor Port Authority. |
| A AB | It appears judging by the construction that is going on in the vicinity of the Ambassador Bridge that it has already been decided where the second crossing will be located. Ontario does not want an additional crossing in that location. | The referenced construction is related to the Ambassador Gateway project which will provide direct access between the U.S. Interstate system and the Ambassador Bridge. |
| A AB | The Ambassador Bridge should not be expanded in its current location. | Building a replacement span of the Ambassador Bridge as an outcome of the DRIC study was considered in the Illustrative Alternatives Analysis phase, but was not carried forward into the DEIS as a Practical Alternative.. See Section 2.1 and Volume 1 : Summary, Evaluation of Illustrative Alternatives on U.S. Side of Border - Technical Report. The permission to build a replacement span of the Ambassador Bridge as proposed by the Detroit International Border Crossing is under review by the U.S. and Canadian federal governments. |

DRIC Comments on DEIS and Responses

| Response Category | Comment | Response |
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| A Bridge | It is not clear from the discussion of p 2-51 if Crossing X10A remains viable for further analysis or not. | At the writing of the DEIS, it was a viable alternative. The FEIS indicates it is not the Preferred Alternative. |
| A Bridge | Put lights on main cables of bridge. Such lights are on Ambassador Bridge, and the new bridge should (with cable lights) be as encouraging to crossing this new span. | Lighting on the bridge will be determined during the design phase and will be the subject of consultation with a number of agencies (Section 3.12 of the DEIS and FEIS). |
| A Bridge | Based on the historic landscape of our Detroit River, that hosts the historic Ambassador Bride and the Belle Isle Bridge, the most appropriate new bridge design needs to be the selection of a suspension bridge. | The bridge type will be determined later, during design. |
| A Gen | There is a way [an alternative to the DRIC], particularly if you're going to concentrate on commercial traffic, that could be handled in well under six months for well under \$6 million. | The proposal suggested by the person commenting has always been indicated by him to be proprietary. It cannot be formally analyzed without knowledge of the proposal. But, there is no viable and practical alternative that can be constructed for \$6 million and in six months. |
| A Gen | 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. | The text beneath Figures 2-11C and 2-12C of the DEIS that describes the characteristics of the alternatives has been edited for the FEIS to note that the mainline of I-75 would have been shifted by these alternatives. |
| A Gen | We are pleased with the support of the Governor of Michigan for continued development of plans and permits for the Ambassador Bridge enhancement project between Detroit and Windsor Ontario, Canada. The Governor's November 1, 2007 letter to you [Hon. Mary Peters, Secretary, Department of Transportation] clearly states that level of support, and we continue to firmly believe that the privately financed second span of the Ambassador Bridge should continue to be an international priority for both the United States and Canada, and a viable option for the taxpayers of the State of Michigan and America. | Comment acknowledged. MDOT and FHWA cannot speak to whether a replacement span of the Ambassador Bridge is an international priority to Canada. In the U.S., the Coast Guard is in charge of reviewing the Bridge Company's application for a permit to build a replacement bridge. MDOT and FHWA have provided input to the Coast Guard's process. |
| A Gen | We are the owners of Kovac's Bar, 6986 W. Jefferson and . . . [a]fter receiving volumes of information . . . We have concluded that a new bridge is necessary . . . And feel that plan 7 would be the best. Any further delays for additional studies would not be in the benefit of anyone who is affected. | Comment acknowledged. |
| A Gen | The . . . DEIS . . . asks the reader to assume that only two alternatives exist . . . In fact a third alternative exists and that is to build another river crossing further downriver. | Other possible crossing locations, including those downriver, were studied and eliminated as a result of application of a deliberative screening process including seven evaluation criteria and dozens of performance measures. This evaluation process is fully documented in the Illustrative Alternatives Analysis Technical Reports that accompany the DEIS and FEIS. |
| A Gen | TRU proposes serious consideration of an improved transit alternative between Detroit and Windsor, such as an extension of the planned Woodward Corridor light rail system under the Detroit River. . . appears to us to be a "reasonable alternative," as that term is used in the Council on Environmental Quality regulations [40 CFR 1502] . . . It therefore is necessary to comprehensively evaluate that option . . . in a supplemental DEIS, as required by 40 CFR 1502.9. | Light rail service across the Detroit River would not support the purpose and need of the project to "provide safe, secure, and efficient movement of . . . goods and people. . . support the mobility needs of national and civil defense . . ." and provide for seamless flow of goods and processing capability for goods (emphasis added). Neither would it "provide reasonable and secure crossing options in the event of incidents, maintenance, congestion, or other disruptions." Therefore, it is not a Practical Alternative and is not subject to the Council on Environmental Quality citations noted. |
| A Gen | The DEIS is a very detailed review of several highway options for building a new truck/automobile bridge over the Detroit River at locations between the existing Ambassador Bridge and the southern tip of Grosse Ile Township . . . | The DEIS reviews Illustrative Alternatives between Grosse Ile to the west and Belle Isle to the east. The Practical Alternative crossings fell between Zug Island and the Ambassador Bridge. |
| A Gen | Given the statement that 44% of the truck traffic crossing AMB [Ambassador Bridge] as of 2004 is potentially divertible to rail . . . It is imperative that the intermodal rail option be addressed, even though the rail intermodal service alternative is not within the jurisdiction of the lead agency in this case. | The report cites 4.4% of the truck traffic could be diverted to rail traffic by 2030. That diversion is built into the DRIC model before it calculated the 128% increase in truck traffic. The information describing this analysis is provided on the project Web site (www.partnershipborderstudy.com) under the Canadian Report entitled "Travel Demand Forecasts." |
| A Gen | The DEIS should be amended to do the requisite analysis of the public transportation alternate. | A public transportation alternative will not meet the project purpose and need. |

DRIC Comments on DEIS and Responses

| Response Category | Comment | Response |
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| A Gen | Low Cost Alternatives - . . . several bridge and tunnel pricing policies [could] provide incentives to travel either before or after the facilities' peak travel hours and/or to travel in high-occupancy vehicles such as car pools or van pools. | Comment acknowledged. |
| A Gen | Low Cost Alternatives - . . . A second option is to entice the drivers of trucks and autos to use the BWB [Bluewater Bridge]. . . A public education program is appropriate. | Traffic shifts based on realistic assumptions between the Detroit-Windsor (Detroit-Windsor Tunnel and Ambassador Bridge plus new DRIC crossing) and Port Huron-Sarnia crossing (Bluewater Bridge) are accounted for in the DEIS and FEIS (Section 3.5.1.2). |
| A Gen | Low Cost Alternatives - . . . Establish a reversible lane program for BWB [Bluewater Bridge] and possible AMB [Ambassador Bridge] to accommodate a major imbalance in directional traffic flows. | A contra-flow lane would be against the curb of the bridge likely with some form of physical divider from traffic moving in the opposite direction, making it function at a lower practical capacity than most bridge lanes. This is not a workable condition, particularly in light of the need to handle expedited cars (NEXUS) and trucks (FAST). Smooth flow across the border, and the effectiveness of the NEXUS and FAST depend on expedited traffic being able to bypass non-expedited traffic. Providing a single lane in the off-peak direction during peaks will not allow the segregation of the expedited vehicles. There would also be substantial constraints on normal operational activities, such as regularly scheduled maintenance or capital maintenance, as well as no reserve capacity for breakdowns. |
| A Gen | Traffic flow can be made more fluid by introducing congestion pricing. . . This concept should apply to both automobile traffic and truck traffic. | Comment acknowledged. |
| A Gen | Building [a bridge] can only help the area as well as its residents. | Comment acknowledged. |
| A Gen | . . . our main concern . . . 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 . . . but it is my understanding that the General Services Agency is serving as the primary conduit for translating the needs of USDA-APHIS into the development of adequate inspection facilities. | The General Services Administration is conducting its analysis of the plaza to ensure adequate facilities are available for functions required to take place there. |
| A Gen | I hope a second bridge is built. It has been very frustrating being held hostage by the whims of private bridge owner. | Comment acknowledged. |
| A Gen | The Detroit Windsor Tunnel, L.L.C. is not advocating a position. We continue to support the allocation of greater resources to make our border more secure and efficient. | Comment acknowledged. |
| A Illus | p 2-5 [of the DEIS] introduces four private-sector alternatives . . . The Mich-Can proposal and Don Flynn proposal are never fully described, nor is it adequately explained why they were dropped. | No individual private entity was considered in the DRIC. Most of the private alternatives were not developed beyond conceptual ideas. Alternatives that reflected the concepts offered by a private sector proponent were analyzed. The Don Flynn proposal was one of the Downriver Alternatives. Those alternatives were elemental in the Illustrative Alternatives Analysis. By the same token, all Practical Alternatives resemble the Mich-Can Proposal. Selecting Crossing X-10B and Plaza P-a as the Preferred Alternative is not an endorsement of the Mich-Can Proposal. |
| A Illus | It is difficult to follow the narrowing of alternatives 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. | The DEIS summarizes the various alternatives that were initially considered. These were evaluated and narrowed down to address Practical Alternatives and how they were developed. Information on Illustrative Alternatives is summarized. Reference is made to the three-volume set of reports on Illustrative Alternatives referred to in footnote 1 of Section 2 of the FEIS. With respect to the narrowing of Practical Alternatives, Tables 2-4 and 2-5 provide the information requested. |
| A Illus | The DEIS needs clarification as to what the DRTP proposes to do. | At the time the DEIS was written, DRTP had publicly announced it was withdrawing its proposal to operate trucks in the former rail tunnel. Nonetheless, its proposal to have trucks use the tunnel was not considered a Practical Alternative (see Section 2.1). |

DRIC Comments on DEIS and Responses

| Response Category | Comment | Response |
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| A Illus | The DRIC screening process improperly narrowed the range of alternatives to include only locations in the Delray community. . . .The DEIS's alternatives analysis fails to satisfy NEPA's requirement. . . . CEQ regulations . . . emphasize that agencies "should present the environmental impacts . . . in comparative form . . ." | A wide range of alternatives was initially considered. These alternatives were then reviewed and ranked based on the identified need and other evaluation factors. Only those that ranked highest were carried further. The alternatives that best met the combined evaluation were in the Delray area. The evaluation of alternatives leading to defining the Delray area as the appropriate location for a new crossing was accepted by FHWA as documented in Appendix C of the DEIS and FEIS. |
| A Illus | The Practical Alternatives were selected without adequate explanation or public participation. . . . According to the EIA [Evaluation of Illustrative Alternatives on U.S. Side of Border, November 2005], each Illustrative Alternative was independently rated by the public and by MDOT on the basis of seven factors, and the results were tabulated and discussed. . . . A month before . . . Michigan Governor Granholm announced publicly that the Downriver and Belle Isle alternatives "have been eliminated. . ." This apparently politically-motivated conclusion was confirmed in the EIA . . . Consequently, the 15 border crossings identified at the scoping stage were narrowed to a small set of "Practical Alternatives" that included just three crossings. | The evaluation of alternatives leading to defining the Delray area as the appropriate location for a new crossing was accepted by FHWA as documented in Appendix C ((Concurrence of FHWA in Analysis of Practical Alternatives and Results)) of the DEIS and FEIS. That documentation demonstrates sufficient analyses were conducted to eliminate the referenced alternatives. The analyses occurred, the decision was made and the Governor's announcement is consistent with it. |
| A Illus | NEPA requires consideration of all reasonable alternatives, not merely alternatives that DRIC project proponents consider practical. | Michigan's Preconstruction Process Documentation Manual guides project development. It includes Task 2340 - Develop and Review Practical Alternatives. "Practical alternatives" is the standard nomenclature used by MDOT (as well as FHWA) for "reasonable alternatives." This has been the case for years. |
| A Illus | . . . After the public/MDOT evaluation process already mentioned [Evaluation of Illustrative Alternatives], and a relatively cursory discussion of potential environmental impacts, numerous Illustrative Alternatives were eliminated from further analysis. | The "cursory" discussion involves: Volume 1: Summary (70 pages); Volume 2: Technical Analysis (220 pages with numerous comparative tables); Volume 3: Technical Data (bound as three separate volumes covering Crossing, Plaza and Route data) (over 500 pages total). The analysis documented in these reports was certified as acceptable by FHWA as documented in Appendix C of the DEIS and FEIS. |
| A Illus | [Illustrative alternative] eliminations were simply announced, entirely apart from the public NEPA process - in the case of the Downriver and Belle Isle Alternatives, by Governor Granholm, and in the case of the Ambassador Bridge alternative, by FHWA. Because analysis of alternatives is an essential feature of any NEPA review, these unusual screening decisions, which appear to have eliminated reasonable alternatives that meet the DRIC project's purpose and need, leaving a single build alternative, thereby making the DEIS legally vulnerable. | The evaluation of alternatives leading to defining the Delray area as the appropriate location for a new crossing was accepted by FHWA as documented in Appendix C (Concurrence of FHWA in Analysis of Practical Alternatives and Results) of the DEIS and FEIS. That documentation demonstrates sufficient analyses were conducted to eliminate the referenced alternatives. The analyses occurred, the decision was made and the Governor's announcement is consistent with it. |
| A Illus | 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. . . . [this] 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." | The DEIS refers on page 2-1 to the three volume set of Illustrative Alternatives reports. These are part of the public record and were made available at 21 public repositories as well as being available on the Web. That analysis narrowed the range of alternatives to those practical alternatives analyzed in the DEIS. The analysis documented in these reports was accepted by FHWA as documented in Appendix C (Concurrence of FHWA in Analysis of Practical Alternatives and Results) of the DEIS and FEIS. |
| A Inter | Why not build the river crossing at the end of Dearborn Avenue? | The extensive ramping system required to connect to the plaza cannot fit at Dearborn Avenue. The impacts would be more significant than the Practical Alternatives included in the DEIS. The Dearborn Avenue area has the largest concentration of homes in the Delray neighborhood. |

DRIC Comments on DEIS and Responses

| Response Category | Comment | Response |
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| A Inter | With the 696 Woodward interchange . . . at the Detroit Zoo . . . animals . . . are protected by everything being below grade level . . . Now, when I see the plan for the ramps going off 75 . . . I'd rather everything be below grade level. | It is not feasible to connect ramps to I-75 at or below the ground surface due to the presence of substantial utilities (including very large diameter [15+ foot] sewers) under Fort Street. |
| A Inter | I would like to go on record as opposing Alternative #5 because of the direct impact on the CHASS Clinic. | Alternative #5 is not the Preferred Alternative. |
| A Own | If a bridge is built, we hope, we very much pray, that it will be publicly owned. | See Section 3.20. The Partnership is committed to providing an end-to-end solution for additional border crossing capacity that will be publicly owned in both countries. Michigan will own the U.S. portion of the bridge, the plaza, and the interchange, with the plaza leased to the federal government. Canada will own the Canadian portion of the bridge and its plaza. The Ontario will own the Canadian access route. Preferred for the bridge is a public-private partnership in the form of a long-term concession agreement which will seek to maximize private sector participation and financing to avoid use of taxpayer dollars by charging reasonable toll. It is envisioned that the owners will form a joint venture to oversee the concession contract with the private sector. The U.S. and Canada are committed to private sector involvement for any combination of the design, financing, construction, operations, and/or maintenance of the bridge crossing. The Partnership will provide oversight of any private sector participation to ensure a safe and secure international border crossing. |
| A Part | The DEIS does not adequately address environmental impacts on an "end-to-end" basis. . . The Canadian environmental review appears to be lagging behind. . . Consequently, readers of the DEIS have little idea what the Canadian half of the DRIC project will look like. . . the Canadian process is front-loaded. All technical studies and public consultation takes place before documents are submitted to the government for review, comment and approval. As currently scheduled, the NEPA comment period will end before the Canadian environmental review is published. It is entirely possible that the entire NEPA process, including issuance of an FEIS, will be completed before anyone knows what the DRIC project will look like in Canada. | The end-to-end evaluation phase was used to indicate that the selected alternative would be an alternative that both nations would find suitable through the use of each nation's respective evaluation procedure. Such an alternative was arrived at and is presented as the Preferred Alternative in the U.S. FEIS and as the Technically Preferred Alternative in the Canadian Environmental Assessment. |
| A Part | The DEIS selectively uses alleged Canadian impacts to advance the idea that a new border crossing is necessary. . . the DEIS specifies that "[t]he proposed second span of the Ambassador Bridge," . . ."was eliminated because, in Canada, the plaza and freeway connection leading to a second span would have unacceptable impacts." . . . According to a November 2005 communication from the regional FHWA administrator. . . that Canadian-impact-based decision was made more than two years before the DEIS was released for public review. . . From all indications . . . outside the boundaries of NEPA . . . | The end-to-end evaluation phase was used to indicate that the selected alternative would be an alternative that both nations would find suitable through the use of each nation's respective evaluation procedure. Such an alternative was arrived at and is presented as the Preferred Alternative in the U.S. FEIS and as the Technically Preferred Alternative in the Canadian Environmental Assessment. |
| A Part | To date, the U.S. federal government, the state of Michigan and private entities have spent around \$230 million on the Gateway Project, which improves the customs plaza and connection to Interstate 75 on the U.S. side of the Ambassador Bridge. Meanwhile, the Canadian and Ontario governments have apparently reneged on their similar \$300 million dollar promise, made as part of a 2003 Memorandum of Understanding, to fund "immediate improvements to assist in the management of traffic on the Highway 3/Huron Church Road Corridor" | The Gateway Project has independent utility and does not rely in any way on changes in Canada. It was designed to accommodate a replacement span of the Ambassador Bridge but is in no way dependent on, or a justification for, a replacement span. Canada and Ontario continue to make improvements consistent with the program entitled: Let's Get Windsor-Essex Moving Strategy for 15 projects in various stages of implementation. These improvements include \$300 million in Border Infrastructure Funds. |

DRIC Comments on DEIS and Responses

| Response Category | Comment | Response |
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| A Part | This Canadian traffic congestion problem and the associated environmental effects are then cited as additional support for the DEIS's alleged need for a new border crossing. This additional example of selectively using Canadian impacts to support the construction of a new border crossing creates a strong appearance of biased decisionmaking. | The end-to-end evaluation phase was used to indicate that the selected alternative would be an alternative that both nations would find suitable through the use of each nation's respective evaluation procedure. Such an alternative was arrived at and is presented as the Preferred Alternative in the U.S. FEIS and as the Technically Preferred Alternative in the Canadian Environmental Assessment. |
| A Part | DRIC is alleged to be a multinational partnership, yet it appears that Windsor and OMT [Ontario Ministry of Transport] are to be blunt "calling the shots" . . . | The end-to-end evaluation phase was used to indicate that the selected alternative would be an alternative that both nations would find suitable through the use of each nation's respective evaluation procedure. Such an alternative was arrived at and is presented as the Preferred Alternative in the U.S. FEIS and as the Technically Preferred Alternative in the Canadian Environmental Assessment. |
| A Plaza | Right and left of Dearborn Avenue are plenty of empty lots for a plaza. | The extensive ramping system required to connect to the plaza cannot fit at Dearborn Avenue. The impacts would be more significant than the Practical Alternatives included in the DEIS. The Dearborn Avenue area has the largest concentration of homes in the Delray neighborhood. |
| A Plaza | The proposed plazas appear to more than double the size of the existing truck plaza for the Ambassador Bridge, which does not seem necessary. | Size requirements for international border crossing plazas are determined on an individual basis by U.S. Customs and Border Protection and the General Services Administration based on the unique circumstances of each crossing throughout the U.S. The Ambassador Bridge plaza on the U.S. side of the border is being expanded. Media reports indicate the bridge owners envision 100 or more additional toll booths. |
| A Prac | The DEIS does not include details of mitigations for each alternative, so it is not possible to fully evaluate preferences. | Mitigation measures are presented in Section 4 of the DEIS and FEIS. Additional measures are included in Section 4 of the FEIS. |
| A Prac | . . . can there be a feasible way to utilize . . . the Dearborn Ave. ramp of I-75 . . . to move bridge related traffic . . . as far west from the majority of the Southwest Detroit . . . population. | Such alternatives were considered (see, for example, Figure 2-8H) but rejected due to engineering issues and impacts, including the West Delray community's desire to redevelop its area. |
| A Prac | The Canadian partners listened to the voices of their people and are studying tunneling. . . [but] on this side [of the border] . . . it has been dismissed . . . | It is not feasible to tunnel in the U.S. under the railroad tracks and Fort Street due to the presence of major utilities including very large diameter (15+ feet) sewers underground. |
| A Pref | . . . consider . . . : increasing the distance between schools and the project and traffic . . . | The Preferred Alternative maximizes the distances of Southwestern High School's academic/indoor areas to traffic areas on the plaza to avoid impacts to the school. |
| A Pref | I have made a lot of Canadian friends who travel the [Ambassador] Bridge quite regularly . . . We all agree that the downriver location is, by far, the most logical location . . . The crossing area which happens to align with EC Row is the perfect choice. | The Preferred Alternative aligns with EC Row Expressway. The Downriver Alternatives were studied and eliminated. |
| A Pref | If you must build a redundant, taxpayer-funded bridge . . . then please make it one of the southern options - X-10. | The Preferred Alternative follows crossing X-10B. |
| A Pref | Keep the bridge west of Clark Park. | The Preferred Alternative is west of Clark Park. |
| A Pref | Respect our Canadian neighbors. Place the bridge west of the Ambassador Bridge. | The Preferred Alternative is west of the Ambassador Bridge. |
| A X-10 | The crossing that is to the east of Fort Wayne will desiccate Olde Sandwich Towne, which is under a great deal of stress already as the ambitions of the existing (Ambassador Bridge) are being fought. | The Preferred Alternative avoids Sandwichtown. |
| Edits | The sidebars on p ES-17 are out of context as these items are not discussed in the summary text. | Issue addressed in FEIS. |
| Edits | p 3-1 references the seven-county SEMCOG region, but it is never explained what SEMCOG is or which counties are included. | Issue addressed in FEIS. |

DRIC Comments on DEIS and Responses

| Response Category | Comment | Response |
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| Edits | p 3-42 indicates . . . "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. | Issue addressed in FEIS. |
| Edits | [In the Preface] change "U.S. Customs" to U.S. border inspection activities" | Change made in FEIS. |
| Edits | [On page ES-2] change Customs inspections plaza" to U.S. border inspection plaza: | Change made in FEIS. |
| Edits | [On page ES-3] change, "Customs processing" to U.S. border inspection processing" | Change made in FEIS. |
| Edits | [On page 1-10] Change, "Customs services" to U.S. border inspection processing" | Change made in FEIS. |
| Edits | [On page 1-11] Change, ". . . efficiency of the Customs staff" to ". . . efficiency of the U.S. border inspection activities . . ." | Change made in FEIS. |
| Edits | [On page 1-12] Change heading "Customs Processing Capability" to "U.S. Border Inspection Processing Capability" | Change made in FEIS. |
| Edits | [On page 1-12] Change "Customs services" to "U.S. border inspection services" | Change made in FEIS. |
| Edits | [On page 2-35] See page 2-14, Paragraph 3: GSA and CBP analyzed the four plaza layouts independently. | Issue addressed in FEIS. |
| Edits | [On page 2-51] Change to read, ". . . Customs and Border Protection (CBP), U.S. Department of Agriculture, Animal and Plant Health Inspection Service-Veterinary Services (USDA APHIS-VS), and Food and Drug Administration (FDA), in cooperation with GSA. . ." | Change made in FEIS. |
| Edits | 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. | No change. The terms are accurate for the process used by MDOT, which does not strictly follow ASTM. |
| Edits | The use of the word "pollutants" should be changed to accurately reflect contamination, e.g., "contaminant." | Change made in FEIS. |
| Edits | Table 3-27 . . . SID No. 90 . . . should be listed under current owner Detroit Economic Growth Corporation . . . | Issue addressed in FEIS. |
| Edits | One potential addition to this list (MI Contaminated Sites) would be "Waterfront Terminal Holdings, LLC at 5431 W. Jefferson . . . | The bridge alignment of the Preferred Alternative is X-10B, well away from the noted site. Therefore, it has not been added to the list. |
| Edits | The use of MI Contaminated Sites could be changed to more actively reflect the rules, e.g. "Part 201 Listed site." | Change made in FEIS. |
| Edits | We noticed that the correspondence we provided . . . on August 19, 2005 was not included among those printed in Appendix F. | The letter should have been included in Appendix F and was not. This omission is noted on the errata sheet in this FEIS. A DEIS typically includes letters from the scoping process. The FEIS includes letters commenting on the DEIS; so this omitted scoping letter is not included in this FEIS. The contents of the letter -- "that there are no impacts to prime and unique farmland and that special attention should be given to possible movement of soil particles to surface waters as construction begins" -- is covered in Section 3.4 of the FEIS. |
| Edits | The DEIS provides the link as http://www.borderpartnershipstudy.com [page 3-83]. The correct link is http://www.partnershipborderstudy.com | Change made and included in errata sheet. |
| Eng | . . . the City of Detroit Water and Sewer Department has requested a permit . . . to construct an additional tunnel to increase their discharge capacity . . . into the Detroit River . . . near the X-10B and X-10A crossings. | Issue addressed in FEIS. |

DRIC Comments on DEIS and Responses

| Response Category | Comment | Response |
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| Eng | Can we have the same underpass (6 lanes) on the Detroit side like Canada showed in their presentation today? | If the reference is to the connection between I-75 and the plaza, the answer is "no." Fort Street and railroad tracks separate the plaza and I-75 in such a way that going under these facilities is not feasible. There are large sewers and other utilities under Fort Street that cause problems. |
| Eng | All plaza and crossing combinations (including plaza approach roads) impact [Canadian] Hydro One transmission lines and distribution feeders, and would require the relocation of some transmission towers and circuits. The proximity . . . will require the upgrade of some station facilities . . . Further, a regular maintenance program of power washing will be required . . . The crossing proponents will be required to reimburse Hydro One for all cost incurred for equipment relocation, upgrade and maintenance. | This information has been made available to the Canadian partners. |
| I A Bur | 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 [activated] in 2007. It does not account for . . . Canadian-owned and operated vehicles . . . Or identify the number of trucks that are owned/operated by individuals whom tend to operate the older vehicles. . . . | The fleet of vehicles, by type and age, used in the air quality analysis is that specified by EPA for the SEMCOG region. |
| I A Concen | There should be some more local scale analysis versus just looking at combined benefits from breaking up the traffic . . . particularly impacts on Southwestern High School | Local-scale air quality analyses were done quantitatively for carbon monoxide (CO) and qualitatively for PM2.5 and PM10, as documented in Section 3.6 of the DEIS and FEIS. These analyses are consistent with the Air Quality Protocol agreed upon by EPA and FHWA. |
| I A Concen | 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 drawing indicated that the plaza will be directly adjacent to Southwestern High School. | From page S-6 of the Air Quality Technical Report, "Sensitive receptors include Southwestern High School, located on Fort Street (M-85), a state trunkline highway to the west of the proposed plaza area. The school fronts directly onto Fort Street. It would be separated from the project's plaza by ball fields, tennis courts, a railroad track, and a buffer zone around the plaza." The distance from the nearest point of the academic building to Fort Street is 130 feet; to I-75 it is 500 feet; to the nearest part of the plaza, where there is active vehicular activity, it is 1500 feet and is separated from the plaza by the gym/cafeteria. This vehicular activity area would be as close as 1300 feet to the gym/cafeteria and 800 feet to the nearest point of the school grounds, the tennis courts along Waterman. |
| I A Conform | Air Quality Technical Report - Section 5.1 - The CO conformity budget is 3,842.8 tons/day, not 1,946 tons/day. | This change does not affect the FEIS. The change is noted in the DEIS errata sheet of the FEIS. |
| I A Conform | The project has already been included in a regional air quality conformity analysis. Depending on the Preferred Alternative selected, minor adjustments may be necessary. | Comment acknowledged. Coordination with SEMCOG will continue. |
| I A Conform | Air Quality Technical Report - Section 5.3.2.2 - The last paragraph of 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 ug/m3. the latest three-year averages for these monitors are 40 for Southwestern High School and 37 for Lafayette. | The statement referred to relates to the standard of 65 ppm that applies until EPA makes non-attainment determinations with respect to the new standard. |
| I A Conform | The potential impacts of increased freight traffic as a result of a new bridge crossing and the associated infrastructure (plazas and roads) need to be studied very closely in terms of the region's already poor air quality standards. | Those conditions have been studied and reported in the DEIS and FEIS (Sections 3.6.3, 3.6.4, and 3.6.5). |
| I A Conform | The DRIC based its conclusion on the assumption that the new EPA regulatory standards . . . will generate adequate emission control . . . to reduce emission levels in 2035 to below levels identified in 2004. However, the number of vehicle hours in the Border Crossing area will increase upwards of 150% over the numbers identified in 2004. | The EPA regulations will improve air quality even though vehicle hours of travel will increase. That increase has been accounted for in the DRIC analysis. |

DRIC Comments on DEIS and Responses

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| I A Conform | The DEIS makes no effort to conduct a Clean Air Act conformity analysis. | The DEIS states that the conformity test will occur after the Preferred Alternative is identified. The test has been run and the project found to conform, so it has been added to the Regional Transportation Plan. |
| I A Conform | Despite . . . national air pollution control programs, additional local controls will likely be necessary for this area to reach attainment of the . . . NAAQS . . . for PM2.5. Any increase in the emissions in this area is cause for concern . . . | The project will not cause an increase in emissions in the non-attainment area in the timeframe of the applicable State Implementation Plan. Decreases in emission rates will not be exceeded by increases in vehicle miles traveled. |
| I A Gen | A "wall" is not going to keep the diesel pollution in the plaza. | True, but future levels of mobile source pollution will be lower than today after new diesel fuel and diesel engine standards of the U.S. Environmental Protection Agency go into effect. |
| I A Gen | There will be higher levels of air pollution. | The analysis in Section 3.6 of the DEIS and FEIS indicates that all air quality standards will be met and that the proposed DRIC project conforms to the U.S. Clean Air Act. Generally, air quality will improve in terms of mobile sources (vehicles) due to ongoing improvements in engines and fuels. |
| I A Gen | What [are] you going to do about the air? | The analysis in Section 3.6 of the DEIS and FEIS indicates that all air quality standards will be met and that the proposed DRIC project conforms to the U.S. Clean Air Act. Generally, air quality will improve in terms of mobile sources (vehicles) due to ongoing improvements in engines and fuels. |
| I A Gen | With more traffic . . . I don't quite understand how air pollution will actually decrease. | The analysis in Section 3.6 of the DEIS and FEIS indicates that all air quality standards will be met and that the proposed DRIC project conforms to the U.S. Clean Air Act. Generally, air quality will improve in terms of mobile sources (vehicles) due to ongoing improvements in engines and fuels. |
| I A Gen | The DEIS goes on to assert . . . Air equality will improve due to improved emission equipment on trucks and low sulfur diesel fuel. This may be overly optimistic. | Projections were made using U.S. EPA data and an analysis protocol in which EPA has concurred. |
| I A Gen | It is not clear why the Fort was not considered a Sensitive Receptor. | Fort Wayne was considered a sensitive receptor. It is analyzed both in terms of carbon monoxide (Section 3.6.4.1) and noise (Section 3.7.3 of the DEIS and FEIS). |
| I A Gen | The air pollution sections focus on Southwest Detroit and ignores . . . The Fort's immediate surroundings and its users. | Fort Wayne was considered a sensitive carbon monoxide receptor, but no impacts were found. Fort Wayne is one area in the Delray community which underwent extensive analysis. |
| I A Gen | In general, the DEIS fails to provide substantial analysis of air and noise data and appears to subjective on many occasions. | The air quality analysis followed the Air Quality Protocol developed specifically for the project by MDOT and FHWA in cooperation with USEPA, MDEQ and SEMCOG. The noise analysis was consistent with FHWA guidance. |
| I A Gen | Additional traffic . . . from both the DRIC and the Gateway Project can only add more pollution. | The project will not reduce emissions. Controls on vehicles will reduce emissions even greater than growth in traffic. |
| I A Gen | We do not find convincing the claims that air quality will improve. | Air quality will improve due to measures taken by EPA to substantially reduce tailpipe emissions. These are noted in the figures that show the declines in emission factors in Section 3.6 of the DEIS and the FEIS and in the Air Quality Technical Report (Figures 2-1, 4-1, and 5-3). |
| I A Gen | . . . It is difficult to fathom how air quality will be improved with the construction of expanded international border crossing capacity that will accommodate the predicted growth n commercial traffic. | Mobile source air pollution will decrease because emissions decrease at a higher rate than the number of vehicle miles increase. |
| I A Gen | . . . real improvements to air quality must be a component of the DRIC Study project. Clearly mobile source emissions are not the only component of localized air quality impacts. | Comment acknowledged. But, mobile sources of pollution are, appropriately, the sole focus of the DRIC air quality analysis. |
| I A Gen | The potential impacts of increased freight traffic as a result of a new bridge crossing and the associated infrastructure (plazas and roads) need to be studied very closely in terms of the region's already poor air quality . . . | The DRIC has made such studies. |

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| I A Gen | We do not find convincing the claims that air quality will improve. | Air quality will improve due to measures taken by EPA to substantially reduce tailpipe emissions. These are noted in the figures that show the declines in emission factors in Section 3.6 of the DEIS and the FEIS and in the Air Quality Technical Report (Figures 2-1, 4-1, and 5-3). |
| I A Gen | To propose [a project] of this type and scope and claim air quality will improve is preposterous. | Air quality will improve due to measures taken by EPA to substantially reduce tailpipe emissions. These are noted in the figures that show the declines in emission factors in Section 3.6 of the DEIS and the FEIS and in the Air Quality Technical Report (Figures 2-1, 4-1, and 5-3). |
| I A Gen | . . . The Marathon Oil Co.'s refinery expansion was announced and approved during the DRIC process. The air quality modeling and analysis must be revised to include this project, and be realistic in terms of traffic projections and amount of pollution caused by the projected increases, not only of trucks but passenger vehicles. . and be conducted by independent air quality experts in no way affiliated with MDOT. The Corradino Group or otherwise connected to the DRIC process. | The Marathon Oil Co.'s refinery was approved by the Michigan Department of Environmental Quality based on Michigan's State Implementation Plan for Air Quality (SIP). SEMCOG reviews the DRIC's project's conformity to the region's mobile source component of the SIP (as opposed to stationary source like Marathon). SEMCOG does this independently of MDOT. SEMCOG has approved the DRIC project. |
| I A Gen | Air quality standards/improvements should be a vital part of the overall design plan. | All air quality standards will be met. |
| I A Health | There should be more consideration for exposure modeling or risk assessment in the air quality analysis | FHWA has determined that, presently, there is not adequate science to reliably include exposure modeling or risk assessment in the air quality analysis. This is stated in Section 3.6.1 of the DEIS and FEIS. Health studies are used to establish standards. NEPA uses what is available. NEPA studies are not intended to establish standards. |
| I A Health | Your agencies did not include a health risk assessment . . . Additional effort must be made to quantify such potential serious increases as to both acute and chronic exposure risk, as well increased cancer risk from the listed acute and hazardous air toxics. | FHWA has determined that, presently, there is not adequate science to reliably include exposure modeling or risk assessment in the air quality analysis. This is stated in Section 3.6.1 of the DEIS and FEIS. Health studies are used to establish standards. NEPA uses what is available. NEPA studies are not intended to establish standards. |
| I A Health | 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. | FHWA has determined that, presently, there is not adequate science to reliably include exposure modeling or risk assessment in the air quality analysis. This is stated in Section 3.6.1 of the DEIS and FEIS. Health studies are used to establish standards. NEPA uses what is available. NEPA studies are not intended to establish standards. |
| I A Health | 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. | Section 3 of the DEIS and FEIS accurately documents the short-term and long-term effects of the proposed DRIC project on Delray. |
| I A Health | I believe it is essential to have the Environmental Justice and Health Impact Study completed and available for comment in the DEIS. | Environmental Justice issues are addressed in the FEIS (Section 3.1.5). A health impact study was not conducted for reasons stated in Section 3.6.1 of the FEIS. Health studies are used to establish standards. NEPA uses what is available. NEPA studies are not intended to establish standards. |
| I A Health | At a minimum an analysis of health impacts needs to be added to the DEIS. | FHWA has determined that, presently, there is not adequate science to reliably include exposure modeling or risk assessment in the air quality analysis. This is stated in Section 3.6.1 of the DEIS and FEIS. Health studies are used to establish standards. NEPA uses what is available. NEPA studies are not intended to establish standards. |
| I A Health | EPA has determined that diesel exhaust is likely to cause lung cancer after years of exposure. | Comment acknowledged. |
| I A Health | 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. . . It is contention that MDOT fail to adequately address the adverse health and environmental effects to the local community and its residents. | FHWA has determined that, presently, there is not adequate science to reliably include exposure modeling or risk assessment in the air quality analysis. This is stated in Section 3.6.1 of the FEIS. Health studies are used to establish standards. NEPA uses what is available. NEPA studies are not intended to establish standards. |

DRIC Comments on DEIS and Responses

| Response Category | Comment | Response |
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| I A Health | The populace of southwest Detroit will be undertaking another source of air pollutants adding to the already cumulative effects of air toxics. . . . | Air quality will improve due to measures taken by EPA to substantially reduce tailpipe emissions. These are noted in the figures that show the declines in emission factors in Section 3.6 of the DEIS and the FEIS and in the Air Quality Technical Report (Figures 2-1, 4-1, and 5-3). Health studies are used to establish standards. NEPA uses what is available. NEPA studies are not intended to establish standards. |
| I A Health | High concentrations of diesel particulate matter . . . are directly associated with the development of lung diseases, including asthma, as well as more insidious cardiovascular diseases. | Comment noted. |
| I A Health | A long-term population study to observe these health impacts should be promoted by MDOT and FHWA. | FHWA has determined that, presently, there is not adequate science to reliably include exposure modeling or risk assessment in the air quality analysis. This is stated in Section 3.6.1 of the FEIS. Health studies are used to establish standards. NEPA uses what is available. NEPA studies are not intended to establish standards. |
| I A Health | The DEIS does not adequately evaluate the potential health impacts of this shift of MSAT emissions for residents of Delray and students at Southwestern High School. . . Public health experts that our organization has consulted indicate reasonable estimates can be made using these models for dispersion modeling. . . The EPA 1999 National Air Toxics Assessment. . has methodology . . . Uncertainty should not be provided as a reason to not conduct necessary analysis of impacts. | The uncertainties in the MSAT analysis process have been carefully documented by FHWA. They are presented in Section 3.6 of the FEIS to be fully transparent in the presentation of information. Health studies are used to establish standards. NEPA uses what is available. NEPA studies are not intended to establish standards. |
| I A Mon | A new monitoring system should be permanently on top of Southwestern High School to determine the rate in which pollution has increases. | Southeast Michigan already has the most comprehensive monitoring network in Michigan which includes a monitor located at the south limit of Southwestern High School. It measures PM2.5, PM10, SO2, manganese, arsenic, cadmium, nickel, volatile organic compounds, and carbonyls. Health studies are used to establish standards. NEPA uses what is available. NEPA studies are not intended to establish standards. |
| I A Mon | Air Quality Technical Report - Section 2.1.2 - 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. | The change is noted in the errata sheet of the FEIS. It does not affect the outcome of the study. Health studies are used to establish standards. NEPA uses what is available. NEPA studies are not intended to establish standards. |
| I A PM2.5 | There should be more focused discussion about how the project will actually affect traffic levels in specific locations. | With identification of the Preferred Alternative, information has been added about local traffic. See 3.5.2 of the FEIS. |
| I A PM2.5 | . . . 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. | MDOT has identified two additional studies, neither yet available to the public. Studies that are available are referenced in Section 4.2 of the Air Quality Analysis Technical Report, notably the Detroit Air Toxics Initiative (DATI) and the Detroit Exposure Aerosol Research Study (DEARS). |
| I A PM2.5 | . . . analysis in the DEIS is based on FHWA's "interim guidance on Air Toxics Analysis . . ."EPA continues to believe this guidance is not consistent with current academic literature and other published guidance. As an example, . . . the extensive report to the American Association of State Highway and Transportation Officials . . . | FHWA understands EPA's concerns, but the pre-amble language in the conformity rule for PM 2.5 hot spot analysis explains why the mobile source emissions model (MOBILE6.2) is not adequate for use in a spot location analysis. The same argument against analyzing health effect applies to MSATs. The interim guidance on MSATs was developed, because of the concerns over the inability of MOBILE6.2 to adequately predict emissions at spot locations. FHWA is concerned about the health impacts of MSATs. That is why FHWA supports research such as the National Near Roadway MSAT Study, which may eventually lead to the ability to develop meaningful analyses of the impacts of MSATs. |
| I A Stand | Air Quality Technical Report - Section 5.1 - Table 5-1: On March 12, 2008 USEPA changed the 8-hour ozone standard from 0.08 ppm to 0.075 pp. The one-hour standard has been revoked. | This change is noted in Table 3-18 of the FEIS. |
| I A Stand | The DEIS 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. | This EPA designations result from application of stricter standards, not poorer air quality. |

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| I A Stand | ... To say PM10 is the standard or that PM2.5 is the standard or that the government has yet to define the standard is questionable. | That is not what the DEIS says. Standards for PM2.5 and PM10 have been established by the U.S. EPA as shown in Table 3-18. |
| I A Stand | ... there is a concern among many health professionals that the current air quality standards from the EPA are insufficient for protecting the public's health. | That is a matter for EPA review and does not affect the DRIC FEIS. |
| I A Toxics | The DEIS state[s] 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. | The MSAT analysis followed the Air Quality Protocol agreed to by regulatory agencies, as explained in Section 3.6.1 of the DEIS and FEIS. |
| I A Toxics | ... the DEIS references the FHWA Feb 3, 2006 Interim Guidance on Air Toxic Analysis in NEPA documents. . . But, the DEIS does not apply NCHRP's best practices guidance for informing the public and decision-makers . . . | Correct. FHWA has not adopted the NCHRP guidance. |
| I A Toxics | 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. There fore, references to potential carcinogenicity for acrolein should be removed. . . | FHWA understands EPA's concerns, but the pre-amble language in the conformity rule for PM 2.5 hot spot analysis explains why the mobile source emissions model (MOBILE6.2) is not adequate for use in a spot location analysis. The same argument against analyzing health effect applies to MSATs. The interim guidance on MSATs was developed, because of the concerns over the inability of MOBILE6.2 to adequately predict emissions at spot locations. FHWA is concerned about the health impacts of MSATs. That is why FHWA supports research such as the National Near Roadway MSAT Study, which may eventually lead to the ability to develop meaningful analyses of the impacts of MSATs. |
| I A Toxics | Guidance and DRIC DEIS acknowledge numerous studies providing evidence that populations living near major roadways face adverse health outcomes. . . numerous publications, including those of EPA and the Centers for Disease Control and Prevention . . . have reviewed available public health studies of current populations exposed to current levels of traffic-related air pollution. . . 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 [American Academy of Pediatrics] should be given greater prominence in the FEIS. | FHWA understands EPA's concerns, but the pre-amble language in the conformity rule for PM 2.5 hot spot analysis explains why the mobile source emissions model (MOBILE6.2) is not adequate for use in a spot location analysis. The same argument against analyzing health effect applies to MSATs. The interim guidance on MSATs was developed, because of the concerns over the inability of MOBILE6.2 to adequately predict emissions at spot locations. FHWA is concerned about the health impacts of MSATs. That is why FHWA supports research such as the National Near Roadway MSAT Study, which may eventually lead to the ability to develop meaningful analyses of the impacts of MSATs. |
| I A Toxics | ... these studies are not specific to MSATs. As such, these studies should be treated separately from MSATS | FHWA understands EPA's concerns, but the pre-amble language in the conformity rule for PM 2.5 hot spot analysis explains why the mobile source emissions model (MOBILE6.2) is not adequate for use in a spot location analysis. The same argument against analyzing health effect applies to MSATs. The interim guidance on MSATs was developed, because of the concerns over the inability of MOBILE6.2 to adequately predict emissions at spot locations. FHWA is concerned about the health impacts of MSATs. That is why FHWA supports research such as the National Near Roadway MSAT Study, which may eventually lead to the ability to develop meaningful analyses of the impacts of MSATs. |
| I A Toxics | Construction emissions may represent a substantial source of PM2.5 emissions . . . We recommend that MDOT and FHWA do all that can be done to minimize PM2.5 emissions . . . including construction activities. . . . We acknowledge the Air Quality Mitigation information. . in their Green Sheet. . which is part of the DEIS. . . . We recommend that FHWA and MDOT undertake an analysis of construction mitigation options and commit to them to the extent possible. | MDOT is committed to implementing the air quality measures listed for construction on the Green Sheet found in the Section 6 of the FEIS. But, it is noted that construction mitigation is voluntary as there would be no increase in PM2.5 from the project in the timeframe of the applicable State Implementation Plan. |

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| I AQ Gen | ... the DEIS contains no discussion whatsoever of greenhouse gas emission or their potential impact on climate change. | To date no national standards have been set for greenhouse gases. EPA has established no criteria or thresholds. But, on April 2, 2007, the Supreme Court issued a decision in Massachusetts et al v. Environmental Protection Agency et al that the USEPA has authority under the Clean Air Act to establish motor vehicle emissions standards for carbon dioxide (CO2), a primary greenhouse gas. The USEPA is determining the implications of the decision. However, the Court's decision did not have any direct implications on requirements for evaluating transportation projects. Further, because of the interactions among elements of the transportation system as a whole, project-level emissions analyses for greenhouse gases are less informative than those conducted at the regional, state, or national level. Because of these concerns, FHWA concludes that CO2 emissions cannot be usefully evaluated in this EIS in the same way as other vehicle emissions. |
| I AQ Gen | 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 . . . Establishment of air quality standards by the EPA does not guarantee improving air quality, as demonstrated by the current nonattainment status . . . | As noted in Section 3.6, air quality monitoring data are trending down. EPA mobile emission factors show downward trends. EPA's purpose in setting standards and taking enforcement actions is to improve air quality. Likewise, MDEQ has taken actions to reduce point source air pollution. Monitoring data reflect these actions. These factors support the conclusion that air quality will improve when the DRIC bridge is included in the analyses, as it splits traffic with the Ambassador Bridge lessening the concentration of traffic in one area of the community. This will improve local air quality. |
| I AQ Gen | EPA has recently highlighted the potentially serious air quality impacts to the Delray community. | This comment is addressed in responses to EPA's comments in a letter of May 14, 2008. See Appendix F of the FEIS. |
| I AQ Gen | ... another problem ... [is] the inadequate discussion of transboundary impacts. ... a June 2006 email states that the DRIC project "will include an air quality impact study that examines the combined effect of emissions on the Canadian and US sides of the border, "as well as" any transboundary movement of primary air pollutants ... " | Transboundary impacts are presented in Section 3.4 of the DEIS. Both U.S. and Canadian air quality analysis conclude there will be no adverse effects. |
| I AQ Gen | Do your plaza, ramp, and flyover models account for the air quality for neighbors from idling trucks? | The air quality analysis followed the Air Quality Protocol developed specifically for the project by MDOT, FHWA, USEPA, MDEQ and SEMCOG. It accounts for idling trucks. |
| I AQ Gen | Flow of traffic across the border is limited by the staffing of Customs/immigration. Customs officers are inadequate ... what kind of assumptions ... did you make? Trucks will sit idling on the bridge ... unless they can be checked more quickly. | Processing times were uniformly applied for all crossings in the traffic and air quality analyses. Staffing levels are the purview of the Department of Homeland Security. |
| I Benefits | Since there is overlap with the remaining alternatives, it seems like some mitigating features would be the same no matter what alternative is chosen. And, it would be very helpful to the community to know any proposed mitigation prior to the Final Environmental Impact Statement since there is so little time at that point for the community to process any response. | The Community Benefits Proposals was a subject of discussion on June 26, July 10, and August 20 prior to publication of this FEIS. Additional discussions were held at the monthly Local Advisory Council/Local Agency Group meetings and several meetings with the City of Detroit's various agencies. |
| I Benefits | P ES-42 discusses ... exploring concepts to enhance the Delray community ... The agencies should continue to work with [the] community [and] develop action plans to ensure the implementation of those plans. | Sections 4.21 and 4.22 of the FEIS includes measures to improve Delray. |
| I Cohes | This study itself had a negative impact on the Delray neighborhood because people were saying, ... "They're going to put a bridge in." And so people, perhaps, did not invest or moved out. | Indications at the numerous DRIC meetings held in Delray do not support this statement. Reference is made to the notes of workshops and public meetings and monthly meetings of the Local Advisory Council/Local Agency Group. All notes are posted on the project Web site (www.partnershipborderstudy.com). |

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| Response Category | Comment | Response |
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| I Cohes | The project will reduce neighborhood cohesion in the blocks surrounding the existing plaza 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. | The project will involve acquisition of 40 commercial lots on Fort Street between Crawford and Campbell streets. Of these, 12 provide retail services to local residents. It is the objective of MDOT's relocation program to place these businesses at a new location as close as possible to the current one, if the owner so desires. Further, it is the objective of the land use planning of the DRIC and the City of Detroit to stimulate increased presence of retail businesses in the area. Further, The massive investment in the new crossing can encourage private investment in housing, logistics, light industry and commercial. A potential commercial historic district in the West Jefferson/West End area, if formally recognized, would allow investors the opportunity to apply for federal and state historic preservation tax credits. |
| I Cohes | It appears to me that your agencies believe Delray residences simply burn to the ground anyway. | It is important to understand Delray's challenges in order to measure impacts and effect change. That properties have burned in Delray at an unusually high rate during the course of the study is a fact key to understanding these challenges. |
| I Cohes | What efforts are in place to preserve Delray's identity during and following the DRIC construction? | The statements made in Sections 3.3.2 and 4.21 of the DEIS and FEIS are indicative of the efforts to preserve Delray's identity during and following DRIC construction. To that end, the community has been very active through the environmental process and has actively informed MDOT of its vision of the future with and without a crossing. MDOT will coordinate the identification of the partners needed to maintain the evolving community identity through and after construction. |
| I Cohes | We will lose 2 or 3 cross streets and 2 or 4 of only 5 foot bridges over I-75. . . . We need to keep continuity. | Access across I-75 has been recognized as a primary community concern. The Preferred Alternative improves this access compared to any Practical Alternative in the DEIS, by providing vehicular access across I-75 via four cross street bridges and five pedestrian/bicycle bridges. Today, there are seven cross streets and five pedestrian/bicycle crossings. |
| I Cohes | Access to the school should be preserved from the north to the south side of I-75, including keeping Springwells open and reconstructing pedestrian bridges over I-75. | The Springwells crossing of I-75 will be open to pedestrians. Green Street will remain as a vehicular and pedestrian crossing. Waterman Street will be removed as a vehicle crossing, but a pedestrian connection will be established nearby. |
| I Cohes | The Detroit Public Schools District alerts you to reduced enrollment in schools (and consequently lower revenue for education) due to population out-migration. | Comment noted. |
| I Cohes | . . . consider incorporating . . . : 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 . . . | The Springwells crossing of I-75 will remain open to pedestrians and vehicles. Green Street will remain as a vehicular and pedestrian crossing. Waterman Street will be removed as a vehicle crossing, but a pedestrian connection will be maintained nearby. |
| I Cohes | Detroit Friends Meeting (Quakers) is missing from the list of principal religious organizations. | Detroit Friends Meeting has been added in the FEIS. |
| I Contam | You will be exposing the neighborhoods with the newer dangers of increased truck traffic carrying dangerous cargo. | Hazardous cargo is not allowed on the Ambassador Bridge. It is already routed through Delray on local streets to the Detroit River Ferry. The ferry entrance is off Jefferson Avenue. No change in impacts will be associated with a new DRIC crossing because hazardous materials will go directly between I-75, the plaza and the crossing. |
| I Contam | Contaminated site assessments and cleanups are not contingent upon the construction of the DRIC, but redevelopment potential. | The DRIC will be a catalyst for action on contaminated site remediation where there may be none or where it may occur later in time without the DRIC. |
| I Contam | . . . 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), . . . those properties would be regulated under Section 20107a . . . 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. . . . The due care requirements were designed so contaminated properties can be safely redeveloped. | Comment acknowledged. |

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| I Contam | 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. | Issue addressed in Section 4.15 and Green Sheet of FEIS. |
| I Contam | . . . 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 [to] remain and will likely need to be operated for an extended period of time. | Issue addressed in Section 4.15 and Green Sheet of FEIS. |
| I Contam | The area beneath the bridge needs to remain accessible in order to complete . . . remedial measures. | Issue addressed in Section 4.15 and Green Sheet of FEIS. |
| I Cost | I don't think there's enough justification to increase my taxes to make another bridge. | The positive economic effects of a new border crossing are documented in Section 3.2 of the DEIS and FEIS. Taxes will not be increased to build or operate the project. |
| I Cost | 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 this alternatives range between \$143 million and \$183 million. | Comment acknowledged, which is consistent with the information presented in Section 3 of the DEIS and the FEIS. |
| I Cost | 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-10B. | The Preferred Alternative does not impact the proposed DWSD Summit CSO facility. Consultations with DWSD staff indicate the Preferred Alternative will not impact the Schroeder CSO facility. |
| I Cost | The positive financial gains of this publicly-owned enterprise should be simultaneously shared with the community to . . . alleviate the burdens to residents and the community. . . . | The positive effects of the project will be best realized by a public-private partnership. The mitigation measures covered in Sections 4.21 and 4.22 of the FEIS will aid in that effort. |
| I Cost | The expenses that may be incurred by residents of the State of Michigan for this development are not sustainable within the current infrastructure. | The project has been judged by FHWA and SEMCOG to be financially sustainable. Only with this determination can the DRIC be included in the Regional Transportation Plan. It was added to the RTP. |
| I Cost | . . . I am concerned about the substantial cost for the new DRIC Bridge. | The project has been judged by FHWA and SEMCOG to be financially sustainable. Only with this determination can the DRIC be included in the Regional Transportation Plan. It was added to the RTP. |
| I Cost | The actual cost of the full project is far greater than the numbers published by MI-DOT in the DRIC DEIS (at page ES-40. According to the May 5, 2008 edition of the Windsor Star, the Ontario Ministry of Transport estimates the full cost of the project is \$5 billion Canadian. | As stated on page ES-51, the costs in Table S-9 are for the U.S. portion of the project. |
| I Econ | I have consistently reiterated the damaging effects and the negative impacts the DRIC would have on this region, including the irreparable harm it would [do] to the Ambassador Bridge, the Detroit/Windsor Tunnel and Blue Water bridge as well The DEIS has acknowledged and confirmed these facts: "Table 3-11B provides further definition of how traffic on the DRIC alternatives is drawn from other crossings . . . ; Blue Water Bridge: 7% decline in cars, 16-18% decline in overall truck traffic with introduction of DRIC crossing . . . ; Detroit-Windsor Tunnel would register a 20-26% decline in total traffic . . . ; Ambassador Bridge would register a 37-39% reduction in car traffic . . . [and] a reduction of 75% of its truck traffic." (Emphasis added.) | Analysis of the economic effects of a new DRIC crossing on all existing crossings indicate they will have revenues that exceed expenses under high and low traffic forecast scenarios, indicating the business viability does not appear to be threatened. See Section 3.5.1.4 of the FEIS. |

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| I Econ | What type of businesses and industries are going to be attracted to the area? | The improved access is most compatible with commercial and logistic/industrial land uses. |
| I Econ | What is going to stop the decline in our local economy as to warrant the projections of increased bridge traffic between the U.S. and Canada? | The traffic crossing the border is local, regional and international. While the local economy is in decline, the broader economy, especially as it relates to cross-border trade, is not. For example, in April 2008, the volume of cross border surface trade was up 15.4 percent compared to April 2007. Michigan led all states in surface trade with Canada in April at \$6.4 billion. |
| I Econ | 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. | That is a correct statement as presented in Section 3.2.2 of the FEIS. |
| I Econ | 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. | The economic analysis cited in Section 3.2.2 of the DEIS and FEIS focused on the State of Michigan as the smallest area unit. Data available from the Detroit Intermodal Freight Terminal Project, for which an FEIS has been prepared using the widely-accepted REMI (Regional Economic Models, Inc.) model indicate the DRIC will create 4,000 to 5,000 construction jobs (out of a total of 10,000) and 10,000 to 12,000 jobs (out of another 25,000) in support of construction. Over and above that, 9,000 to 13,000 jobs would occur in Detroit that would otherwise not be created without a new crossing. |
| I Econ | A direct correlation of this point would be the current 56 businesses, roughly making up 686-920 jobs that currently exists (2008) versus 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 relocations/displacements as a direct result of the DRIC, leaving a net loss of approximately 145 jobs in 2035. | First, as noted in Section 3.2.3 of the DEIS and FEIS, most businesses want to relocate in or near to Delray. Second, a number of construction jobs are likely to be held by city residents, some of whom live in and near Southwest Detroit. Third, a number of long-term permanent jobs, outside those for crossing operations, can be expected to be held by people in Detroit. Data available from the Detroit Intermodal Freight Terminal Project, for which an FEIS has been prepared using the widely-accepted REMI (Regional Economic Models, Inc.) model indicate the DRIC will create 4,000 to 5,000 construction jobs (out of a total of 10,000) and 10,000 to 12,000 jobs (out of another 25,000) in support of construction. Over and above that, 9,000 to 13,000 jobs would occur in Detroit that would otherwise not be created without a new crossing. |
| I Econ | 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. | The discussion cited is that additional/new tax revenues will offset any losses. This is particularly true as the Renaissance Zone designation area eliminates most taxes on Delray property. |
| I Econ | 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 . . . that "past trends will continue," when in fact progress is being made. | There will be no "sacrifice" of Delray because of the DRIC. Further, progress until now to protect the area as a residential enclave has not been evident as stated in many interviews with those knowledgeable about the area, particularly those who live and work there. Those interviews are included in the Community Inventory Technical Report that accompanied the DEIS. |
| I Econ | What parameters are being used to identify the "local" economy? | The DEIS and FEIS consider broad economic impacts at state and national levels. Nonetheless, using data available from the Detroit Intermodal Freight Terminal Project, for which an FEIS has been prepared using the widely-accepted REMI (Regional Economic Model, Inc.) model indicates the DRIC will create 4,000 to 5,000 construction jobs (out of a total of 10,000) and 10,000 to 12,000 jobs (out of another 25,000) in support of construction. Over and above that, 9,000 to 13,000 jobs would occur in Detroit that would otherwise not be created without a new crossing. |
| I Econ | Impacts to the West Vernor and Springwells commercial districts must be thoroughly assessed . . . | Impacts to the West Vernor and Springwells commercial districts have been thoroughly assessed. No adverse effects are expected to occur. |

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| I Econ | Several entities have articulated the need for an economic strategy designed to develop the Great Lakes region, Michigan, and southeast Michigan as a global logistics and transportation hub. . . .The DRIC Study should advocate for such a coordinated strategy as well as provide funding and leadership to forward this critical initiative. | The land use concept developed as part of the DRIC recognizes the logistic potential of the area to be served by two bridges, particularly Delray. |
| I Econ | . . . 56 businesses may be relocated . . . An economic development strategy must be developed with the goal of retaining these businesses in southwest Detroit and Delray. | The Relocation Plan allows the relocatee to select a location of his/her/its (business) choosing. |
| I Econ | The DRIC project is designed to divert traffic away from other border crossings in Michigan. . . The DEIS does not explain why it makes financial sense for the government to build a new bridge . . . capturing . . . traffic from existing border crossings that have been and continue to be supported with some level of public funding. | The DRIC project serves the broad public economic good. When traffic flow, travel time/distance saved, and jobs created are considered, as documented in Section 3.5.1.4 of the FEIS, that good is well served. |
| I Econ | Detroit's half of the tunnel is currently under consideration for a securitized lease or sale to the City of Windsor . . . The impact on Detroit, should Detroit remain owner of the tunnel, of losing 20 to 26% of its future traffic . . . has not been calculated by the DEIS | Analysis of the economic effects of a new DRIC crossing on all existing crossings indicate they will have revenues that exceed expenses under high and low traffic forecast scenarios indicating the business viability does not appear to be threatened. See Section 3.5.1.4 of the FEIS. |
| I Econ | If accurate traffic forecasts are compared to the U.S. construction costs for the DRIC project (between \$1.3 and \$1.5 billion), debt service, operating and maintenance costs for the bridge will exceed projected revenue, necessitating a continuing public subsidy for the DRIC bridge. | Judgments on the financial aspects of the DRIC will be made prior to its construction based on sound fiscal standards. |
| I Econ | The construction of any new . . . crossing must include coordination with all other trade routes . . . and maximize the opportunity as described in the Brookings Institute report (Vital Connection) for transportation logistics development in SW Detroit . . . | The DRIC is consistent with the Brookings Institute Report (page 22): "By 2015: Define and Implement the 'U.S.-Canada Border of the Future.' The increased pressure to secure our common boundary offers a unique opportunity to rethink aging and often inefficient infrastructure, technology, and processes towards a border concept that meets long term security and trade goals, and facilitates efficient movement of people, goods, and services across the border." The DRIC Bridge specifically addresses: "...key transportation and infrastructure improvements should include: expanded and functional border transportation infrastructure such as access roads, new and existing bridges, ferry terminals and operations, ports, mass transit connections, and rail lines; ..." |
| I EJ | The DEIS claims that harm from the DRIC project "would not be disproportionately high and adverse to minority population groups" because "impacts to minority population groups are not appreciably more severe than the impacts that would be experienced by non-minority population groups in the study area.: This sort of "analysis" subverts the entire purpose of environmental justice review. The issue is not whether minority groups within a study area will suffer as much as non-minority groups in that same area, but rather whether it is environmentally just to build the DRIC project in a neighborhood largely populated by minorities. | Since the publication of the DEIS, a Preferred Alternative has been identified. Once the Preferred Alternative was identified, the next step was to determine if this alternative would have a disproportionately high and adverse effect on minority and low-income population groups in the study area. Based on updated census information and field reviews, it was determined that the Preferred Alternative will have a disproportionately high and adverse effect on minority and low-income population groups in the study area. (Section 3.1.5) MDOT has been working with the community in developing mitigation measures that would avoid, minimize or mitigate for these impacts. MDOT and the community have also identified community enhancements which are listed in the "Green Sheet" at the end of Section 4. |
| I EJ | There is no discussion in the environmental justice analysis concerning potential impacts to the community from noise and traffic emissions. | Noise and air quality impacts were addressed in the DEIS. Noise and air quality discussions were referenced in the EJ Section (Section 3.1.5 of the DEIS). The impacts (air quality and noise) were not found to be significant to minority and low-income population groups, as well as non-minority population groups. |

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| I EJ | 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. | In the DEIS, 2000 Census data were used to identify minority and low-income population groups, and non-minority population groups. Remember, the study area (based on 2000 census) was one of the most diverse communities in Detroit. At the time of the analysis, the Preferred Alternative was not identified. Analysis of the different variations of the build alternatives could not specifically identify (minority, low-income or non-minority) who lived in the homes to be potentially displaced. It was recognized that further analysis of community demographics would be needed for the FEIS. A Preferred Alternative has been identified. Further field reviews along with updated census information indicates it will have a disproportionately high and adverse effect on minority and low-income populations in the study area (Section 3.1.5 of the FEIS). |
| I EJ | 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? | Since the publication of the DEIS, a Preferred Alternative has been identified which will impact 257 dwelling units and 43 businesses. A field review of the study area indicates that there is adequate replacement housing and industrial/commercial space available in Southwest Detroit (Section 3.1.4 and Conceptual Stage Relocation Plan – Appendix A). |
| I EJ | 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." I149 | Air quality analysis of particulate matter associated with the use of diesel fuel, and the relation of those pollutants to Southwestern High School, are reported in Section 3.6 of the DEIS and FEIS. The analysis has found that there will be no negative effects on the high school. Health studies are used to establish standards. NEPA uses what is available. NEPA studies are not intended to establish standards. |
| I EJ | 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. | MDOT has and will continue to work with the community in mitigating disproportionately high and adverse impacts to minority and low-income populations. Since the publication of the DEIS, a Preferred Alternative has been identified. Further field reviews along with updated census information indicates that the Preferred Alternative will have a disproportionately high and adverse effect on minority and low-income populations in the study area (Section 3.1.5 of the FEIS). MDOT has been working with the community to avoid, minimize and mitigate these impacts. Mitigation measures and community enhancements are discussed in Section 4 of the FEIS, and the "Green Sheet" located at the end of Section 4. |
| I EJ | 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. | MDOT has been coordinating with the community throughout the NEPA Process. Many community members who have participated are minority and/or low-income. The community was involved in establishing the evaluation factors, which included Environmental Justice as a performance measure category, and weighing the evaluation factors along with weights established by MDOT. The performance ratings determined which illustrative alternatives moved forward to the practical alternative stage and which were eliminated. Two illustrative alternatives, located in River Rouge and Belle Isle respectively, have a higher concentration of minority populations. |
| I EJ | We sincerely believe that it is essential to have the Environmental Justice and Health Impact Study completed and available for . . . comment . . . | The Environmental Justice analysis and determination that there is a disproportionately high and adverse effect on minority and low-income population groups in the study area is discussed in Section 3.1.5 of the FEIS. Impacts and mitigation measures are also discussed in Section 3.1.5 and in the "Green Sheet" at the end of Section 4 of the FEIS. A health impact study will not be conducted as stated in Section 3.6.1 of the FEIS because FHWA has determined that there is not adequate science/technology to reliably include exposure modeling or risk assessment in the air quality analysis. |

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| I EJ | 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. | In the DEIS, there is no conclusion that conditions will worsen due to additional vehicle miles and vehicle hours of travel in the border crossing area. However, EPA regulations, such as cleaner fuels, efficient gas engines, and cleaner diesel engines will improve air quality in the study area even though vehicle use will increase. |
| I EJ | All alternatives . . . severely affect neighborhoods that already bear the disproportionate burden of . . . the high volume of transportation passing through the community. The Delray neighborhood and the proposed DRIC interchange and plaza areas are some of the most distressed areas in the nation. . . environmental justice issues . . . including noise, visual and spatial impact, and especially air quality, would be made worse by a new border crossing. | Existing heavy truck traffic patterns now generate significant noise. Homes along the north side of I-75 will benefit from noise walls that are not there today. Visually, there will be a landscaped buffer around the plaza, compared to a mix of homes, businesses, vacant lots, and abandoned areas. Air quality will not be worse due to cleaner engines and fuel. |
| I EJ | Placing a plaza that abuts Southwestern High School where trucks will be idling or where additional truck traffic will be in the area in no way can be considered to "not have a disproportionately high and adverse effect on minority population groups in the Delray Study area." | The FEIS finds that there is a disproportionate effect. Mitigation is included in Sections 4.2 and 4.21 of the FEIS and in the "Green Sheet," included in that section. |
| I EJ | The key word is disproportionately which requires a comparison of something to something. The Community Inventory Technical Report presents Community Neighborhood Characteristics for specific Southwest Detroit neighborhoods . . . but it does not compare socio-economic data . . . with the outer metropolitan Detroit area as well as the Wayne County cities not surveyed. Even with the five Wayne County cities reviewed, data are not presented as a comparison to the immediate impacted Southwest Detroit neighborhoods. | MDOT, FHWA, and the community have developed mitigation measures that will avoid, minimize and mitigate the impacts that the Preferred Alternative will have on minority and low-income population groups. The mitigation measures are discussed in Section 3.1.5 and in the "Green Sheet" located at the end of Section 4. |
| I EJ | Governor Jennifer Granholm signed into law Executive Directive No. 2007-23 on November 21, 2007. . . Hopefully these guidelines will be finalized and included in a final approval document for a project such as this. | Comment acknowledged. |
| I EJ | Education and income are key to survival. Did the DEIS consider both factors in their Community Neighborhood Characteristics? | It considered income and employment, the latter a surrogate for education (See Table 3-6A in the DEIS). |
| I EJ | It is imperative that the spirit of environmental justice directives are followed to ensure that Southwest Detroit is not further disproportionately impacted by adverse air and noise impacts, loss of cultural and social resources, and an overall undermining of the residential and commercial development potential. . . | Comment acknowledged. |
| I EJ | The environmental justice analysis . . . has not been given the serious consideration it deserves, especially since the plaza for the bridge will be located near Southwestern High School. | The disproportionate impacts on minority and low-income populations are discussed in Section 3.1.5 of the FEIS. Mitigation of them is presented in Sections 4.2 and 4.21 of the FEIS and the "Green Sheet" in that section. |
| I EJ | We believe it is essential to have an Environmental Justice and Health Impact Study | Environmental Justice is addressed in the DEIS and FEIS. A health impact study will not be conducted as part of the DRIC, consistent with FHWA's position. |

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| I EJ | By eliminating all alternatives outside the low-income, high minority Delray community, the DEIS obscures severe environmental justice impacts. Pursuant to Executive Order 12898, FHWA and MDOT are obliged "to the greatest extent practicable" to make "achieving environmental justice part of [their] mission." . . . the presence of disproportionately high and adverse effects on minority and low-income populations "should heighten agency attention to alternatives (including alternative sites), mitigation strategies, monitoring strategies, monitoring needs, and preferences expressed by the affected community or population" | MDOT and FHWA have worked with the community to balance disproportionate impacts with benefits. See Sections 4.2 and 4.21 of the DEIS and FEIS. |
| I EJ | FHWA and MDOT . . . have affirmatively acted to eliminate alternatives that would have had fewer impacts on the diverse community in Delray. | Communities other than Delray were eliminated from further study beyond the Illustrative Alternatives Evaluation, such as River Rouge and the Belle Isle area, have greater concentrations of minority populations. |
| I EJ | In spite of these impacts to Delray, the DEIS's discussion of environmental justice issues shows little evidence of the requisite heightened agency attention. . . . The DEIS seems to be saying that the project is not an environmental justice problem because it will harm minorities living the study area in proportion to the overall population of minority groups in the study area. . . . This argument falls to pieces when any location outside of Delray is considered. . . . For instance, . . . in the Downriver Study Area . . . | The disproportionate impacts on minority and low-income populations are discussed in Section 3.1.5 of the FEIS. Mitigation of them is presented in Sections 4.2 and 4.21 of the FEIS and the "Green Sheet" in that section. |
| I EJ | The environmental justice analysis is meaningless if a project proponent can simply locate all of its "Practical alternatives: in a minority community, and then claim that the people in that community will not be disproportionately affected when the project is built. . . . The only way to correct this failing is to go back and reconsider other build alternatives not located in Delray. . . . | The disproportionate impacts on minority and low-income populations are discussed in Section 3.1.5 of the FEIS. Mitigation of them is presented in Sections 4.2 and 4.21 of the FEIS and the "Green Sheet" in that section. |
| I EJ | . . . All DRIC alternatives will severely affect neighborhoods that already bear disproportionate negative impacts of the high volume of transportation passing through the community. | The disproportionate impacts on minority and low-income populations are discussed in Section 3.1.5 of the FEIS. Mitigation of them is presented in Sections 4.2 and 4.21 of the FEIS and the "Green Sheet" in that section. |
| I EJ | Clearly MDOT is attempting to once again use highway development as a tool for removing urban blight . . . | MDOT and the community have been working together to identify key issues and concerns such as blight in the Delray Area. A conceptual Master Plan was developed by the community (hopefully the city will adopt the plan) which will help guide the community in the future. The community has also been working with MDOT and other agencies to identify community enhancements that would improve the Delray Area. |
| I EJ | 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? | Expected local benefits are not "minimal." Many residents indicate they will relocate in the City of Detroit and most business relocate near Delray. A number of construction jobs are likely to be held by city residents, some of whom live in and near Southwest Detroit. A number of long-term permanent jobs, outside those for crossing operations, can be expected to be held by people in Detroit. Exact estimates are not available. |
| I EJ | The DEIS's build alternatives would disproportionately affect the low-income, predominately minority community of Delray. . . . Alternatives that would not affect Delray were apparently eliminated from further study at the behest of Michigan's governor. | Communities other than Delray, which were eliminated from further study beyond the Illustrative Alternatives Evaluation, such as River Rouge and the Belle Isle area, have greater concentrations of minority populations. The Governor's announcement was consistent with the DRIC technical analyses. |
| I F&W | The draft EIS provides an adequate discussion of the consequences to fish and wildlife resources from construction of each of the practical alternatives. | Comment acknowledged. |

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| I F&W | We [Interior] appreciate the willingness of the FHWA and . . . MDOT to work with the FWS on the lighting design to minimize potential avian mortality . . . we recommend that the coordination . . . also involve discussion of designs and measures . . . to minimize potential avian impacts as they develop and evaluate bridge structure designs . . . We recommend that any such coordination be documented in the final EIS. | Decisions regarding bridge type and final design will be made after the FEIS and Record of Decision are completed. |
| I Gen | It is 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 . . . noise, local transportation systems, relocation of families, destruction of church congregations, demolition of historic buildings and the impacts to air quality . . . | Documentation is provided on all these subjects in the DEIS itself and in the many Technical Reports that support it. These reports have been available to the public since February 29, 2008, at 21 repositories around the Delray area and region - several near to Webster Elementary School, including the Campbell and Bowen branches of the Detroit Public Library and Southwestern High School. This covers mitigation appropriately for a DEIS. More information is provided in the FEIS, as the DEIS indicates it will be. Public input to the FEIS will be considered further. |
| I Gen | I am writing in support of not destroying the Delray community by using it as a bridge site [which] would surely disrupt a lot of people who are currently in dire straights. | The DEIS analysis process found Delray to be the most suitable site for the crossing of the Detroit River, consistent with the application of a deliberative screening process including seven screening criteria and dozens of performance measures. This evaluation process is fully documented in the Illustrative Alternative Analysis Technical Reports that accompany the DEIS and FEIS and are summarized in Section 2.2 of the DEIS and FEIS. The location has the support of many, if not the majority, of residents of Delray. |
| I Gen | As an educational institution we are also very concerned since the results of this project will be a hindrance and add yet another stumbling block to the lack of educational access . . . | It is unclear how a new border crossing will be a hindrance to education. |
| I Gen | 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. 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. | Comment acknowledged |
| I Gen | This is a letter of support for the new bridge going through Delray. . . . I support the new bridge [because] 1. . . Free trade . . . economically it is a benefit for the Detroit and Metropolitan area; 2. Security . . . just in case something happens; 3. Trucks have become so congested that there is need for another crossing; 4. There is a need for new life in this community with I feel will happen with the construction of a new bridge. | Comment acknowledged. |
| I Gen | Environmental impacts to the school will be significant, including impacts on air quality, noise and congestion. | Section 3.6 of the DEIS shows no NAAQS standards will be violated and that MSATs will be split between two locations, both of which have schools nearby. No congestion is expected from normal traffic operations with two bridges separated by about two miles. Bridge traffic will go directly to and from I-75, except for some local traffic that goes to Fort Wayne. The auto and truck traffic now traveling to the businesses between Post, Campbell, the railroad tracks and Jefferson Avenue will be removed with project development. |

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| I Gen | Unfortunately there simply is no way that the [DRIC] DEIS as it is constructed at this time can address the totality of environmental impacts of the three separate proposals. [DRIC, DRTP and Ambassador Bridge] | The replacement span of the Ambassador Bridge was eliminated as a Practical Alternative because of the significance of impacts in Canada and its inability to satisfy the full complement of project needs (namely efficiency via freeway-to-freeway access and system redundancy) (Section 2.1 of DEIS and FEIS). The current DIBC proposal before the U.S. Coast Guard is stated to be a replacement of the existing bridge without adding capacity. The DRTP proposal was eliminated because it did not address long range mobility needs (Section 2.1 of the DEIS and FEIS). |
| I Gen | We are concerned about possible impacts on HUD-funded activities along the proposed design and route. . . 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). . . . We believe it is necessary to have a more thorough understanding of the Demolition and Relocation Plans. . . | The plans to use portions of Delray for the DRIC do not require use of HUD-funded properties. |
| I Gen | Increased greening and buffering must be designed with SWHS representatives as well as opportunities to enhance the campus, curriculum, and extra-curricular programs. Particular attention to the ingress and egress of the school campus must be a component of the design workshops. | Such considerations are consistent with the development and application of Context Sensitive Solutions which will continue into the design phase of the DRIC project. CSS is based on significant public engagement. |
| I Gen | Environmental impacts to the school will be significant, including impacts on air quality, noise and congestion. | Section 3.6 shows no NAAQS standards will be violated and the MSATs will be split between two locations, both of which have schools nearby. There will be no congestion. Bridge traffic will go directly to and from I-75, except for some local traffic that goes to Fort Wayne. The auto and truck traffic now traveling to the area bounded by Post, Campbell, the railroad tracks and Jefferson Avenue will be removed with project development. |
| I Gen | The DEIS rightly acknowledges that the Ambassador Bridge replacement span is part of the No Build alternative . . . but it fails to follow that acknowledgement to its logical conclusion. . . . it should have been treated as part of the environmental baseline Indeed, the DEIS appears to ignore advice received from the U.S. State Department to "incorporate the Ambassador Bridge's proposed enhancement project in the Secondary and Cumulative Impacts part of the Document.?" | The replacement span of the Ambassador Bridge is not an approved project. Nonetheless, its impacts are appropriately noted in Section 3.14 of the DEIS and FEIS. |
| I Gen | If Canada stays strong we can look forward to a great bridge in SW Detroit. I am pleased at the detail in the planning and the clear way it is presented. | Comment acknowledged. |
| I Gen | Your long dragged-out study has caused fear and neighborhood decline. | Major transportation endeavors take years to accomplish due to the many analyses required by law to protect the human and natural environments. Decline of Delray has been ongoing for 40 years and is not at all associated with the DRIC. |
| I ICE | We have concerns about adequate disclosure in the DEIS of the cumulative effects and transboundary impacts of the DRIC project when considered together with other transportation projects in the region, including the Ambassador Bridge expansion project and the Blue Water bridge project. | In the absence of understanding what the concerns might be, the cumulative and transboundary impacts are fully covered in Section 3.14 of the DEIS and FEIS. |
| I ICE | The DEIS indicates that indirect and cumulative traffic and air quality impacts are not expected to increase. The DEIS fail[s] 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). | The most important mobile source change in the near term will result from reduced driving from SEMCOG's forecast of a regional economic downturn. The effects of other projects is almost negligible in a regional context. DIFT will reduce truck traffic regionally and, within Southwest Detroit, will reorient truck traffic to I-94. The Gateway Project will reduce congestion (air emissions) at the border. Transit development projects will be positive, if they occur. |
| I ICE | The DRIC did not account for an accumulative effect from other transportation projects forecasted for Detroit. | The most important mobile source change in the near term will result from reduced driving from SEMCOG's forecast of a regional economic downturn. The effects of other projects is almost negligible in a regional context. DIFT will reduce truck traffic regionally and, within Southwest Detroit. The Gateway Project will reduce congestion (air emissions) at the border. Transit development projects will be positive, if they occur. |

DRIC Comments on DEIS and Responses

| Response Category | Comment | Response |
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| I ICE | The two huge projects are so near one another, I am concerned that there seems to be no coordination between the two. | There is complete coordination as a result of overlap of MDOT technical staffs, and review of each project by senior management staff of MDOT and FHWA. |
| I ICE | The proposed Detroit Intermodal Freight Terminal (DIFT), the widening of Interstate 94, the reconstruction of the Detroit River rail tunnel, the construction of the MDOT Gateway Project, and the DRIC Study project are all located in Southwest Detroit. Segmenting the planning and evaluation of these project dilutes the real impacts, particularly cumulative impacts. | The projects have not been segmented. Each of these projects has independent utility under NEPA and, so, must be considered individually in terms of their environmental impacts. NEPA requires that the cumulative effects of these projects be considered, and this has been done (Section 3.14 of the DEIS and FEIS). |
| I ICE | A project of this scale demands that multiple agencies work together to cohesively design an overall system of transportation and place that maximizes efficiencies. | Lead by the Federal Highway Administration, there are seven other federal cooperating agencies on the DRIC project that meet quarterly. State agencies regularly attend these meetings, as well. Members of the Local Agency Group are invited to attend monthly meetings with the Local Advisory Council. These groups include organizations focused on the overall transportation system like SEMCOG, the Detroit Department of Transportation, the Wayne County Public Works Department and the City of Detroit Public Works Department. |
| I ICE | Livernois-Dragoon and the streets which have schools (Junction, Clark, Central, Vernor, etc...) need to be limited to local trucks only. The DRIC project is both an opportunity and an obligation to re-think conflicting land uses and designate truck routes to better deal with the various intermodal activities in the area. | The Ambassador Gateway project by MDOT is specifically designed to remove trucks from local streets. The DRIC project will move trucks between the new bridge and I-75 without use of the local road system and make truck use of Livernois and Dragoon substantially harder. MDOT's Detroit International Freight Terminal Project, likewise, will reorient trucks to north Livernois Avenue (away from the Livernois/Dragoon one-way pair) and will provide new gates into the Livernois-Junction Yard from Wyoming Avenue. |
| I ICE | . . . the DEIS selectively cites alleged impacts of the U.S. project in Canada to reinforce what seems to be the predetermined goal of building a new border crossing. | The goal of a new border crossing was determined through the binational feasibility study in 2004. The DRIC study has been transparent from the outset. |
| I ICE | The DEIS fails to adequately address the DRIC project's transboundary impacts. CEQ issued . . .Guidance on NEPA Analysis for Transboundary Impacts, July 1, 1997. Courts . . .have required that agencies consider both (1) the impact of actions in the United States on other countries, and (2) the impacts of actions in other countries on the United States. . . the DEIS states that, "[b]ecause of the bi-national nature of the project, transboundary effects, i.e., those effects in Canada caused by the project[,] are covered in the 'Indirect and Cumulative Impacts['] section." . . . the . . . section, however, speaks only in the most general terms . . . The DEIS makes no effort to describe how the Canadian side of the project would affect the environment in the United States. . . The complete lack of analysis of impacts flowing across the border renders the transboundary section per se inadequate. | Canada has conducted its own environmental process which has covered the impacts on the Canadian side of the border. The determination was made by the Canadian authorities to situate the bridge in the same area that the FEIS is covering on the U.S. side of the border. The FEIS took into account the Canadian environmental determination. |
| I ICE | The DEIS' claims that there will be "no negative indirect and cumulative cultural resources impacts" is false as stable residential communities, historic districts, parks, churches, health clinics, and other institutions (including historic Fort Wayne), . . . will be negatively affected . . . | Coordination has occurred with the SHPO, and all decisions related to cultural resources under Section 106 have been coordinated through them. |
| I ICE | "Induced demand" cannot account for the increase in traffic that would be necessary to create a need for the proposed new crossing. . . Moreover, the suggestion that a new crossing is needed because the additional traffic demand that such a crossing would create is more than the existing crossings can handle is the worst kind of circular argument. | The induced demand analysis (Section 3.2 of the DEIS and FEIS) was not used to justify a crossing. It was employed to define the shifts in jobs that could occur if a new crossing were built. |
| I Jobs | [On page ES-19] "400 jobs": Is that CBP alone, or does it include the other federal inspection services? | It is 400 jobs in 2035 at U.S. Customs and Border Protection. |

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| I Jobs | [On page ES-19] "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. | 200 brokers is the total employee broker-related population in 2035. |
| I Land | I am very concerned that the new bridge being proposed by the . . . DRIC partnership could further divide Delray and further suffocate the community's efforts to revitalize. | The planning done in conjunction with the DRIC has opened the door to a new view of potential revitalization of Delray (Section 3.3 of the DEIS and FEIS). The citizens of Delray were instrumental in developing the new vision. |
| I Land | 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," . . . such as rezoning, Industrial Review Committee resolutions and Host Community Agreements to name a few. . . . It is unfair to state that Delray is expected to grow more industrial without a crossing. | Past trends indicate Delray has become more industrial in the last 50 years particularly in the last 10 years. Reference is made to Section 3.1.2.1 and Section 3.3 of the DEIS and FEIS. |
| I Land | We believe that it is a matter of simple human and "environmental justice" that MDOT continue to work with the community to actually implement the proposed land usage plans. | MDOT is not the official land use planning agency. The City of Detroit is. MDOT has and will continue to coordinate with the City as the project advances. Additionally, MDOT will continue to work with the community and will facilitate partnership building to include agencies and organizations that have tools, programs, and expertise to implement strategies for land use and investment. |
| I Land | It is a matter [of] human and environmental justice that MDOT continue to work with the community to actually implement the proposed Delray Land Use Plans for the new community that the residents designed. | MDOT is not the official land use planning agency. The City of Detroit is. MDOT has and will continue to coordinate with the City as the project advances. Additionally, MDOT will continue to work with the community and will facilitate partnership building to include agencies and organizations that have tools, programs, and expertise to implement strategies for land use and investment. |
| I Land | The DEIS improperly delays its discussion of land use impacts to Delray until the FEIS. The DEIS describes a "vision" of making Delray "a better place to live . . ." MDOT and FHWA claim to be "exploring a number of concepts by which enhancements may be made . . . But the DEIS contains no concrete information . . . | MDOT is not the official land use planning agency. The City of Detroit is. MDOT has and will continue to coordinate with the City as the project advances. Additionally, MDOT will continue to work with the community and will facilitate partnership building to include agencies and organizations that have tools, programs, and expertise to implement strategies for land use and investment. |
| I Land | We believe that it is a matter of simple human and environmental justice that MDOT continue to work with the community to actually implement the proposed Delray Land Use Plans. . . These land use plans represent a significant step toward ensuring that local host community impacts and growth are included in the final project design. | MDOT is not the official land use planning agency. The City of Detroit is. MDOT has and will continue to coordinate with the City as the project advances. Additionally, MDOT will continue to work with the community and will facilitate partnership building to include agencies and organizations that have tools, programs, and expertise to implement strategies for land use and investment. |
| I Land | DRIC has . . . engaged in plans . . . outside . . . its . . . mandate . . . driven by a small group of local residents which were not within the view of most of the residents, this delayed and added cost to the planning of the project . . . | The planning for the DRIC is consistent with state and federal law and did not cause delays or add cost to the planning effort. |
| I Land | The State has overstepped its boundaries because, if the city rejects the proposed [land use] 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 land use plan in the DRIC DEIS (Section 3.2.2.1) is compatible with the land use plan for the area pending before the Detroit City Planning Commission for adoption. The City Planning Commission as well as the Detroit Economic Growth Corporation participated in the plan's development. It was shaped based on their comments. |
| I Land | There are no impacts to agriculture. | Comment acknowledged. |
| I Noise | There will be higher levels of noise. | The noise analysis in Section 3.7 of the DEIS and FEIS calls for noise walls along I-75 in several locations. Noise levels in other locations are not affected by the DRIC to the extent noise mitigation is required. |
| I Noise | I lived right there on West Jefferson and Harrington Street. All I see is trucks all day and all night. What about the noise? | Today's truck traffic on Jefferson Avenue is not expected to change substantially. Noise from the Preferred Alternative would come from its bridge over Jefferson Avenue and the plaza. A representative noise level for Harrington Street is shown in Table 3-23 of the DEIS. It is 59 dBA, which is well below established criteria that would call for mitigation. |

DRIC Comments on DEIS and Responses

| Response Category | Comment | Response |
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| I Noise | How about the noise . . . there [near Harrington Street] . . . They skipped over that. | Noise levels (59 dBA) are well below established criteria for mitigation. |
| I Noise | The noise factor [on Harrington] would be a problem | Noise levels (59 dBA) are well below established criteria for mitigation. |
| I Noise | With more traffic . . . I don't quite understand how noise will actually decrease. | DRIC noise is mostly related to truck traffic. DRIC truck traffic, in large part, will be in locations where truck traffic is already heavy. Noise levels will be reduced along I-75 by noise walls where justified. The plaza will be buffered from adjacent land uses. (see Section 3.7 of the DEIS and FEIS.) |
| I Noise | I heard last month walls, noise barrier walls, might not be on the freeway side, but on the other side. Well, if that's going to block residences, I'd rather those residences be taken. | The noise analysis for the Preferred Alternative calls for noise walls as indicated in Table 3-25 of the FEIS. Noise walls will be placed within MDOT right-of-way. |
| I Noise | The [Detroit] 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. | Noise wall placement will occur within MDOT right-of-way. Consultation will occur with the City and affected residents. |
| I Noise | 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 use during and after construction. | The primary noise sources are and will be Jefferson Avenue truck traffic, traffic internal to the Fort, and airplane overflights, not a new crossing. |
| I Noise | The EIS was silent on the potential impact vibrations will have on the Fort structures during construction and long-term post construction. | There would be no such impacts. The Preferred Crossing is over a quarter mile away. Room and pillar salt mining requires daily detonations that have been noted by neighbors at community meetings. These have been ongoing for years. Modern construction techniques simply do not propagate substantial vibrations. If there is a concern, MDOT provides for before and after surveys to document any change. |
| I Noise | The Detroit Public Schools District alerts you to increased noise during construction and from increased traffic and the plaza. | Comment acknowledged. |
| I Noise | The Detroit Public Schools District alerts you to vibration effects on foundations and structures and the ability of student to concentrate and learn effectively. | Comment acknowledged. |
| I Ped/bike | Since the Detroit-Windsor Truck Ferry was closed to bicyclists in 2006, there has been no way to cross the border on bicycle I advocate opening the border to bicyclists. | The bridge and plaza layouts in the DRIC FEIS allow for bicycle crossings. A final determination will be made by U.S. Customs and Border Protection and the Canadian Border Protection Services Agency. |
| I Ped/bike | A number of cross streets that connect the neighborhoods north and south of I-75 will be lost. This . . . will most certainly result in isolation for businesses and residents . . . and for CHASS it will further limit access to our users. Many of our clients walk to the clinic via Junction. | The Preferred Alternative will provide access across I-75 at Springwells, Green, Livernois, and Clark, plus five pedestrian crossings. Two DDOT bus lines will be rerouted. Only the rerouting of Rt. #11 - Junction may affect access to CHASS. Public transit route revisions have been developed in collaboration with the Detroit Department of Transportation. |
| I Ped/bike | The DEIS indicates a number of pedestrian crossing over I-75 will be removed and some existing transit routes will be impacted 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. | The Preferred Alternative will provide access across I-75 at Springwells, Green, Livernois, and Clark, plus five pedestrian crossings. |
| I Ped/bike | Closing streets that cross over the I-75 expressway or reducing the lanes on remaining cross overs will impact the community on both sides of Fort Street. | The Preferred Alternative will provide access across I-75 at Springwells, Green, Livernois, and Clark, plus five pedestrian crossings. All streets crossing I-75 will have sidewalks on both sides to accommodate pedestrians. |

DRIC Comments on DEIS and Responses

| Response Category | Comment | Response |
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| I Ped/bike | Future design . . . should include . . . connections between neighborhoods and to the Detroit River; and increasing non-motorized routes and pathways. The design analysis must be extended to those areas that will be impacted north of Interstate -75 by changes to the local roadway, new freeway ramps, and relocation. | Access across I-75 has been recognized as a primary community concern. The Preferred Alternative improves this access compared to any Practical Alternative in the DEIS, by providing vehicular access across I-75 via Springwells, Green, Livernois, and Clark, plus five pedestrian crossings. Today, there are seven vehicle crossings and five pedestrian/bicycle crossings. The Preferred Alternative provides new boulevards on Green and Campbell to enhance access to the Detroit River. Also, bike lanes will be added to connect to the West Riverfront and Rouge River Gateway paths when they are constructed. Finally, there will be non-motorized pathways within the plaza buffer zone. |
| I Ped/bike | Design alternatives to the local roadway changes should include concepts for increasing green spaces, non-motorized paths, lighting, and signage. In particular, the West Riverfront and Rouge River Gateway plans should be components of the final land use design. | Landscaping will be included in the buffer around the plaza. A non-motorized path is also contemplated. All will be developed in the design phase through the application of Context Sensitive Solutions principles. |
| I Ped/bike | The DRIC project should comprehensively provide for access to the plaza and bridge by pedestrians and bicycles, including a safe and recreationally effective pedestrian-bicycle lane on the bridge as well as necessary accompanying infrastructure for access on both sides of the border. Such infrastructure should be able to link to greenways and pedestrian-bicycle paths on both sides of the border . . . both federal and state law provides that such consideration must be addressed. | A bike lane in each direction on Jefferson/Clark from Dearborn to Clark Park is part of the DRIC plan to compliment the West Riverfront and Rouge Greenway initiatives. The DRIC bridge and plaza layouts allow for bicycle crossings. A final determination will be made by U.S. Customs and Border Protection. |
| I Ped/bike | The construction of any and all border crossings must include the financing and completion of all SW Detroit greenways connecting to the west riverfront up into and through the neighborhoods, and joining onto the Detroit International Riverfront riverwalk, and the SW greenway that connects to the Rouge Gateway greenway. | A bike lane in each direction on Jefferson/Clark from Dearborn to Clark Park is part of the DRIC plan to compliment the West Riverfront and Rouge Greenway initiatives. The DRIC bridge and plaza layouts allow for bicycle crossings. A final determination will be made by U.S. Customs and Border Protection. |
| I Ped/Bike | Pedestrian crossings should be replaced, keeping the community clinic (CHASS Clinic) accessible. | Pedestrian links have been maintained where engineering constraints do not prohibit them. |
| I Reloc | I would like you to consider my property (8101 Witt); houses are being taken right up to our house [We] are in a hardship. | Final property acquisition needs will be determined during the design phase. At this time, the property in question is not affected and will not be acquired. |
| I Reloc | It was mentioned seven churches, will be quote, "relocated," end quote. Are you talking about relocating the parishioners or . . . actually physically moving the buildings to preserve them . . . particularly some that may have historical value? | One church facility- St Paul AME - has been determined to be eligible for listing on the National Register of Historic Places. Avoidance of the church is not possible and therefore the facility cannot be physically saved. Although relocation of the structure may be possible it is not likely to be a recommended option due to the impact of changing the building's historic context both in location and change in congregation if not function. It should be noted that the congregation leadership is supportive of the DRIC and is looking forward to moving to facilities that better meet congregation needs and is closer to where congregation members live. |
| I Reloc | I have concerns about Harrington. If you're going to consume most of that area . . . you should be able to add that one block. | Final property acquisition needs will be determined during final design. At this time the property in question is avoided, but Green Street Boulevard has been realigned so no residences are isolated between the boulevard and the plaza. |
| I Reloc | St. Paul AME Church . . . I've been going ever since I was 6 years old, now it's on your wall [to be relocated]. But you're telling me that you don't have plans. | MDOT is engaged in a planning and environmental analysis process that must be concluded before there is a decision to advance the project to implementation. One church facility- St Paul AME - has been determined to be eligible for listing on the National Register of Historic Places. Avoidance of the church is not possible and therefore the facility cannot be physically saved. Although relocation of the structure may be possible it is not likely to be a recommended option due to the impact of changing the building's historic context both in location and change in congregation if not function. It should be noted that the congregation leadership is supportive of the DRIC and is looking forward to moving to facilities that better meet congregation needs and is closer to where congregation members live. |

DRIC Comments on DEIS and Responses

| Response Category | Comment | Response |
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| I Reloc | The bridge is right at my street. It's going to take up Post Street and Green Street. Harrington is in the middle of that. There's only about seven or eight hoses on Harrington Street. How could they leave those few homes? | Final property acquisition will be determined during final design. At this time, the property in question is expected to be needed for the Green Street Boulevard right-of-way. |
| I Reloc | I'm also wondering why these houses that are going to be purchased can't be purchased ahead of time . . . I've started working on a house and pretty much stopped . . . I would hate to do that work knowing that somebody's just going to come and tear it down. | MDOT acquires real estate consistent with federal and state laws and regulations. Except in special circumstances, it cannot acquire property in advance of a Record of Decision, which is the formal federal action that determines if a project will officially advance. MDOT advises you to continue maintaining your home as if the project is not approved. |
| I Reloc | Alternative #5 appears to [have] the most impact to our organization . . . [taking] a corner of the property where the new building footprint is planned, effectively taking half of the facility that we are so diligently working to build . . . Therefore we ask that Alternative #5 be removed from consideration. | The Preferred Alternative's ramp to northbound I-75 will pass over Fort Street approximately 200 yards west of the new facility's footprint. There will be no physical impact to CHASS. |
| I Reloc | I heard last month that homes will be purchased at market value rather than replacement value. I think that has the potential for decimating the community. | Residents, by law, must be relocated to decent, safe and sanitary housing. By Michigan law, homeowners must be paid 125% of market value for their principal residence. See Section 4.1 of the FEIS and the references therein. |
| I Reloc | I believe that homes should be purchased for a value that's sufficiently high that people can afford to purchase homes with the money they've received. | Residents, by law, must be relocated to decent, safe and sanitary housing. By Michigan law, homeowners must be paid 125% of market value for their principal residence. See Section 4.1 of the FEIS and the references therein. |
| I Reloc | The relocation strategy should adequately address the particular needs of renters. | Application of the federal Uniform Relocation and Real Property Acquisition Act requires the relocation needs of each renter and home owner be addressed. See Section 4.1 of the DEIS and FEIS. |
| I Reloc | Your agencies are also assuming that the hundreds of displaced Delray residents can be "absorbed" by the Metro Detroit tri-county area . . . The DEIS, however, does not explain how a community that generally lives below the poverty line and lacks access to vehicles is supposed to move out to the suburbs. | Special workshops were held in Delray for potential relocatees to provide them with as much information as possible. Many of those potential relocatees who were interviewed indicated a preference to relocate within Detroit (Section 3.1.4 of the DEIS and FEIS). The relocation program is guided by law and guidelines that have evolved over many years to treat relocatees fairly. See Section 4.1 of the DEIS and FEIS. |
| I Reloc | Some . . . 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. | Many of those potential relocatees who were interviewed indicated a preference to relocate within Detroit (Section 3.1.4 of the DEIS and FEIS). The number who may attend Phoenix Multicultural Academy and also move out of the area is not known. |
| I Reloc | Reloca[tion] . . . would also disrupt the school enrollment. | The project is not expected to disrupt the school enrollment of Southwestern High School or Western International High School. |
| I Reloc | We are a historical denomination. We are the oldest black institution in the United States. We believe that the church is the people not the building. | Comment acknowledged. |
| I Reloc | 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. | The federal Uniform Relocation Act procedures that must be followed on any project sponsored by the Federal Highway Administration and MDOT are summarized in Section 4.1 of the DEIS and FEIS. |
| I Reloc | Where do low-income, disenfranchised people go when their homes are taken by eminent domain? Many persons living in the Delray neighborhood are a part of the Empowerment Zone which permits them to be exempt from paying the city of Detroit property taxes for 12 years. . . how ill these people survive if they will now be required to pay higher utilities, property taxes and possibly a mortgage albeit at a low interest rate? | The Uniform Relocation and Real Property Acquisition Act is a federal law that will guide any relocation of residents and businesses, including renters and owners. It ensures fair treatment of all. |
| I Reloc | The DEIS does not present socio-economic data that discusses or compares the survivability of a population of displaced person. It is suggested such a study be conducted. | No such study will be conducted. |

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| Response Category | Comment | Response |
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| I Reloc | The Build Alternative is projected to relocate 324-414 household (This equates to how many people? How many of these are senior citizens? . . Student who attend Southwestern High School? . . How many use public transportation? | The DEIS (Section 3.1.4) indicates 828 to 1,014 people are in the households that could be relocated. It is unknown how many are students of Southwestern High School. Census data for the area indicates fewer than 5 percent use public transportation which is lower than for Detroit as a whole. |
| I Reloc | . . . Careful analysis of the impact of future property tax liability on low-income individuals is warranted as it is my understanding . . . low income households would not be able to sustain the property tax liability of a replacement dwelling. | Michigan law may allow for some short term tax relief on an individual basis. This is an incentive to relocate to Renaissance Zone. |
| I Reloc | CHASS Clinic . . . is not slated for acquisition . . [but] it would be severely impacted by any alternative. The FEIS must include provisions for the planned campus expansion, ensure that passenger and pedestrian routes are optimal, and truck traffic is routed away from the facility. | The nearest ramp to the CHASS Clinic does not approach to any closer than 200 yards with the Preferred Alternative. |
| I Reloc | . . . the DEIS's chapter discussing mitigation of environmental impacts is wholly inadequate . . . Thus, the Delray residents who would be forced from their homes if the DRIC project were to proceed are offered nothing more than a "Conceptual Stage Relocation Plan." . . No sources of funding for this plan are identified, and no concrete commitments to the residents are made. | The purpose of the Conceptual Stage Relocation Plan is to ensure that there is adequate replacement housing and business space. There can be no commitment to residents until the project is approved for implementation through execution of the Record of Decision, and funding is secured. |
| I Reloc | . . . at the very least people in the target area [should] receive compensation for the delays in the past and in addition receive payment from the state such that many of us can leave this area . . . | MDOT and FHWA do not pay for relocation until a project advances beyond a Record of Decision, and funding is secured. At that time the relocation policies in Section 4.1 of the DEIS and FEIS will apply. |
| I Reloc | . . . the people of this area have been what amounts to be "tethered goat" unable to make key discussion with regards to our property and how and when DRIC will or will not move forward with the taking of homes and property in the target area . . . | MDOT and FHWA do not pay for relocation until a project advances beyond a Record of Decision, and funding is secured. At that time the relocation policies in Section 4.1 of the DEIS and FEIS will apply. These policies do not pay compensation for "project delay." |
| I Reloc | . . . it has been said that the "State will pay for attorney's for the people affected by our (The State) taking of property" this is untrue and is not permitted by the MCR or MRPC. | If litigation becomes necessary for MDOT to acquire needed property, the Uniform Condemnation and Procedures Act will be followed, which addresses attorney fees. Every effort is being made to expedite project approvals to minimize the time of uncertainty for homeowners. |
| I Reloc | I have been told by a highly reliable source that when she asked at the public meeting in July . . . if the bridge is not built MDOT . . . [is] still going to take the homes. . . What are the plans of the State? | This FEIS has identified a Preferred Alternative, which means there is a build alternative. After the project Record of Decision is signed and funding is secured, MDOT will begin acquiring right-of-way. If there is no project, MDOT will not and cannot acquire houses that are identified by the DRIC for acquisition. |
| I Reloc | . . . businesses, churches, and other commercial property owners were left out of the process even though their properties are in the area that could be taken for either a new plaza or new freeway entrances/exists. | Such property owners were contacted by MDOT regularly and repeatedly. |
| I Reloc | We have been located at Junction & Driggs for nearly 100 years. Our factory employs 30 Detroit taxpayers. . . We are worried about X-11 destroying our business. What method will be used to compensate and relocate? | Crossing X-11 is not the Preferred Alternative. |
| I Reloc | I am surprised that as one of "only 41-56 businesses" to be affected, we have not yet been contacted. | This business was never a potential relocation. Only those businesses falling within the potential right-of-way of an alternative were contacted. |
| I Reloc | Can you give me a list of the churches that would be taken . . . Is All Saints Church one . . . ? | Churches that will be affected with the project as stated in the DEIS are: St. Paul AME, Abundant Life Holy Church, New Day Church, First Latin American Baptist, and Detroit Friends. All Saints Church is not one of them. |
| I Reloc | All displaced residents and businesses [should] be properly compensated. | MDOT abides by all state and federal laws and regulations, which protect those to be relocated. See Section 4.1 of the DEIS and FEIS. |

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| I Sec 106 | The three "Tiers" graphically presented on page 3-113 regarding above ground resources do 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. | Coordination with SHPO staff and further research indicated that some historic resources listed in the December 3, 2007 letter are no longer considered potentially eligible for the National Register. Section 3.9.4 of the DEIS reflected that coordination. |
| I Sec 4f | The DEIS's alternatives analysis is also inadequate with respect to Section 4(f) properties. . . A review of the alternatives eliminated through the EIA [Evaluation of Illustrative Alternatives] process in light of the relevant regulations demonstrates that several feasible and prudent alternatives were exclude from the DEIS's Section 4(f) analysis. . . The Downriver and Belle Isle alternatives do not appear to be imprudent under these [FHWA regulations] criteria. | The proposed Belle Isle Illustrative Alternative passed right by the "crown jewel" of the Detroit Parks system -- Belle Isle. The impacts to Section 4(f) properties for this and the Downriver Alternatives are enumerated in the three-volume report Evaluation of Illustrative Alternatives Technical Memorandum. |
| I Sec 4f | . . . The DEIS eliminated the Ambassador Bridge Enhancement Project alternative, which would not displace any residents or businesses, or adversely impact any Section 4(f) properties. | This comment addresses U.S. impacts, not Canadian. Canadian impacts were judged to be significant to owners of properties and historic areas. |
| I Sec 4f | Other potential historical resource issues were not properly considered by the DEIS. . . The Hurons were known to have engaged in communal burial on Zug Island, and it is possible that similar burial mounds or other archeological sites exist in Delray. . . From 1878 to 1880 and again in 1883, the Michigan State Fair was held . . . apparently on land running from River Road to the Detroit River. | These resources were fully investigated in consultation with the State Historic Preservation Office. See the Archaeological Phase I and II Investigations and the two-volume Above-Ground Resources Survey which is available at the 21 repositories and on the Web. |
| I Sec 4f | The Department [Interior] concurs with the . . . 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 measure 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; . . A copy of the MOA [Memorandum of Agreement], once executed, should be attached to the final evaluation. | A draft MOA is in Appendix E. It will be executed by the time the Record of Decision is signed. |
| I Sec 4f Wayne | Please reference and explain as appropriate the Fort Wayne Master Plan in Section 3 . . . on pages 3-43, 3-44, 3-75, and 3-125. | References to the Fort Wayne Master Plan have been added to the FEIS (Section 3.3.1.3 of the FEIS). |
| I Sec 4f Wayne | Please clarify any relationship between the Fort Wayne Master Plan and the Rouge River Gateway Master Plan Trail. | There is no known relationship and neither refers to the other. |
| I Sec 4f Wayne | The description of "easier access" to Fort Wayne is not fully explained . . . access 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? | Signing on I-75, the plaza, and in appropriate locations within the host community will be provided. Additionally, information and directions can be made available at Welcome Centers, AAA, and other venues. Cross-border marketing coordination could be used to inform Canadian travelers about the fort and other Delray, Detroit, and regional attractions (and information on Sandwich Towne, Windsor and regional attractions in Canada would be provided on the U.S. side). |
| I Sec 4f Wayne | We need to keep good and attractive access to the site [Fort Wayne] and not throw away still unclaimed opportunities for public good. | The project will increase the visibility and access of Fort Wayne , which is expected to improve its opportunities for redevelopment. |
| I Sec 4f | Now for the Section 4(f) Evaluation of historic properties. . . I want you to go tell people who live in these historic buildings that they can't live there no more because you might need their property. | The Preferred Alternative would not relocate any persons living in National Register listed or eligible buildings. Under Section 4(f) efforts have been made to avoid impacts to historic resources. Those resources that could not be avoided are not residential but a business (Kovac's Bar) and a church (St. Paul AME). The owners of both properties have indicated support for the project. |
| I Sec 4f Wayne | Preserve Fort Wayne. | The State Historic Preservation Office has found the DRIC will not have an adverse effect on Fort Wayne. The project will improve its visibility. |
| I Security | You are adding a terrorist target in our backyard. | Proper security will be in place to protect the new river crossing system. |

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| I Security | I'm very concerned about what the future plans will be with the new bridge for homeland security. | Those plans are the purview of the U.S. Department of Homeland Security and are not released for public consumption. |
| I Security | Homeland security is improved by implementing a cross-border light rail transportation service because it is a simpler task to process public transportation patrons individually. | While light rail transit moves people, it does not move goods over long distances - a DRIC project need. |
| I Security | As the DRIC Study progresses, . . . discussion . . . should include an initiative designed to ensure . . . credible security protocols while improving efficiency and reliability. | These issues will be addressed by the U.S. Department of Homeland Security and the Michigan Homeland Security. |
| I Security | As the DRIC Study progresses, . . . discussion . . . should include an initiative designed to ensure . . . credible security protocols while improving efficiency and reliability. | These issues will be addressed by the U.S. Department of Homeland Security and the Michigan Homeland Security. |
| I Security | The Detroit Public Schools District alerts you to Traffic hazards for students and staff safety traveling to and from school | Comment acknowledged. |
| I Security | The Detroit Public Schools District alerts you to increased crime as a result of the concentration of traffic and commerce in the area. | Comment acknowledged. |
| I Security | . . . the new Public Safety Center on Fort Street . . . cannot be negatively affected by street closures. | Police personnel have been consulted. An access plan for the Southwest Public Safety Center has been agreed upon. See Section 3.15.1 of the FEIS. |
| I Security | The Southwest Detroit Police and Fire Station is located on W. Fort St. near Clark St. and these safety services utilize the easy on & off ramps in both directions of I-75 at Clark St. and these access ramps must not be removed. | Police personnel have been consulted. An access plan for the Southwest Public Safety Center has been agreed upon. See Section 3.15.1 of the FEIS. |
| I Security | . . . take a second look at Watermen's proposed closure. Should something occur on the plaza, bridge, the children will have only east or west Fort Street to escape. Has this closure been discussed with the DPS [Detroit Public Schools] safety division? | Emergency egress would remain to the north (Green Street), south (Post Street), east and west (Fort Street). Several conversations took place with the school's principal. Almost 50 meetings for the public were held at Southwestern High School. Pedestrian crossings at Beard and Waterman Streets will be built to accommodate emergency evacuation of all school occupants to the north across I-75. |
| I Storm | We have not identified nor do we anticipate any impacts on established county or intercounty drains. | Comment acknowledged. |
| I Storm | Information . . . on sedimentation control measures and stormwater management plans sufficiently addresses EPA's scoping comments on stormwater. | Comment acknowledged. |
| I Traf | 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? | The traffic forecast represents a shift in traffic from the Blue Water Bridge and Detroit-Windsor Tunnel as noted in Section 3.5.1.2 of the DEIS and FEIS. |
| I Traf | Is there any concern about the continued validity of proposed Blue Water Bridge plaza enhancements? | No. The Blue Water Bridge plaza enhancements are needed to address existing problems. The diversion from the Blue Water Bridge is of traffic growth and that is relatively small. Data included in the FEIS indicate traffic on the Blue Water Bridge will increase from today's conditions under both the build and no-build forecast. |
| I Traf | 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? | Only existing and committed projects are included in the traffic analysis of Build and No Build Alternatives. A "sensitivity test" of traffic effects of the proposed replacement span of the Ambassador Bridge on the DRIC crossing was conducted (see Section 3.14.3 of the FEIS). |
| I Traf | 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? | No it will not. |

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| I Traf | p 3-70 indicates additional coordination will occur regarding congestion in the area of the new crossing. SEMCOG fully supports and encourages this coordination. | Comment acknowledged. |
| I Traf | I am concerned about increased traffic on the freeways and the loss of use for commuters, and for our continuity with the downriver suburbs. | Traffic growth on I-75 in Southwest Detroit is slower than other freeways in Michigan. The DRIC traffic analysis (Section 3.5 of the DEIS and FEIS) indicates I-75 will operate efficiently (Levels of Service of D or better) as will all local streets that are directly connected to it (Levels of Service of B or better). |
| I Traf | The community on the north side of Fort Street will experience additional truck traffic. | The community on the north side of I-75 will experience less, not more, truck traffic, as most of that traffic depends on the Livernois-Dragoon interchange with I-75, which would be eliminated. |
| I Traf | As expressway traffic backs up on I75, truckers will seek the quickest route to enter or exit of I75 to I94 or I75 and will use Jefferson Avenue in River Rouge down to South Schaefer. | Such backups are not expected under normal traffic conditions because there will be two bridges instead of one. |
| I Traf | A trucker expressed concerns about the proposed rerouting of trucks and stated in all probability routes trucker will take. Please reference this previous public comment. | This comment is believed to refer to continued use of the Livernois/Dragoon one-way pair. Measures that will discourage this use are noted in Section 3.5.3 of the DEIS and FEIS. The DIFT project to the north of the DRIC project will reorient an entrance to a major truck/train intermodal yard in a way that will reduce truck traffic on the one-way pair. The interchange of Livernois and I-94 will be reconstructed to facilitate truck access from that direction, not I-75. |
| I Traf | It is critical that the Preferred Alternative is determined based on its ability to remove trucks from the local roadway system. The removal of truck traffic from the local roadway system [by the Gateway Project], particularly on Clark Street, must not be undermined by a new configuration of freeway ramps. | The Preferred Alternative traffic analysis has taken into account local truck routes due to placement of the plaza that will cut off several streets. See Section 3.5 of the FEIS. |
| I Traf | Clark and Junction streets function as the main north and south access routes connecting Southwest Detroit neighborhoods. These routes should be protected for continued residential use. | Access across I-75 has been recognized as a primary community concern. The Preferred Alternative improves this access compared to any Practical Alternative in the DEIS, by providing vehicular access across I-75 via Springwells, Green, Livernois, and Clark, plus five pedestrian crossings. Today, there are seven vehicle crossings and five pedestrian/bicycle crossings. The Preferred Alternative provides new boulevards on Green and Campbell to enhance access to the Detroit River. Also, bike lanes will be added to connect to the West Riverfront and Rouge River Gateway paths when they are constructed. Finally, there will be non-motorized pathways within the plaza buffer zone. |
| I Traf | A revitalized Delray neighborhood must be connected to surrounding neighborhoods. | The Preferred Alternative maintains connections to surrounding neighborhoods through access to/from and across I-75 for pedestrians and vehicles. |
| I Traf | Despite the fact that Livernois and Dragoon are residential, a substantial volume of truck traffic travels these streets. . . years of truck travel have resulted in a diminished quality of life for those living on these streets. . . [There is] strong consensus that trucks should be permanently removed from Livernois and Dragoon . . . Achieving this outcome must be a priority of any DRIC Study alternative. | Measures that will discourage use of Livernois/Dragoon are noted in Section 3.5.3 of the DEIS and FEIS. The DIFT project to the north of the DRIC project will reorient an entrance to a major truck/train intermodal yard in a way that will reduce truck traffic on the one-way pair. The interchange of Livernois and I-94 will be reconstructed to facilitate truck access from that direction, not I-75. |
| I Traf | Beard ELCC will be directly impacted by increased traffic and widening of the I-75 service drive | The ramp configuration of the Preferred Alternative will take traffic from southbound I-75 to the service drive and past the Beard EEC. Waterman Street in front of the school will be closed over I-75, reducing traffic on that street. |
| I Traf | The DEIS also expressly states that the new DRC bridge will compete with, and divert traffic from the Ambassador Bridge, the Detroit-Windsor Tunnel and the Blue Water Bridge in Port Huron . . . | Comment acknowledged. |

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| I Traf | The DRIC project should create a designated trucks-only road as well as designated truck routes to remedy the existing and impending truck traffic on residential streets due t economic activity associated with the international crossing. . . This comment pertains to truck traffic with local destinations. . . With the closure of the Livernois-Dragoon access to I-75 . . . trucks are likely to be forced onto West End and Dearborn streets in the more populated area of Delray. | Local trucks use the Dearborn, Westend, Livernois/Dragoon, and Clark interchanges. The Preferred Alternative will change the access pattern at Livernois/Dragoon and remove Livernois and Dragoon in the plaza area. Local truck traffic now using Livernois/Dragoon will shift to Clark for destinations to/from the north on I-75. Destinations to/from the south already use Dearborn and West End. That pattern is not expected to change as those roads are the logical choice for truck use. |
| I Traf | I don't like Alternative 16 because it looks like they will make West End a truck route and I am 100% against that because it will cut right through the area of Delray that will be left. | Local trucks use the Dearborn, Westend, Livernois/Dragoon, and Clark interchanges. The Preferred Alternative will change the access pattern at Livernois/Dragoon and remove Livernois and Dragoon in the plaza area. Local truck traffic now using Livernois/Dragoon will likely shift to Clark for destinations to/from the north on I-75. Destinations to/from the south already use Dearborn and West End. That pattern is not expected to change as those roads are the logical choice for truck use. |
| I Traf | The traffic route decisions must be chosen with careful consideration, be creative, methodical and deliberate with intense analysis of the selection of any new traffic routes built, created or modified to ensure the least amount of disruption occurs to our community. | Section 3.5.3 explains changes to local traffic. In general, removal/modification of the Livernois/Dragoon interchange ramps will reduce truck traffic on the Livernois/Dragoon one-way pair. |
| I Traf | It would be counterproductive for the DRIC traffic routes to . . . effect the landscape all the way to east, to Clark St. or even Junction. | The Preferred Alternative will close Junction. Travel across I-75 will then occur via Clark Street or Livernois Avenue. |
| I Traf | Route Alternatives should not cause increase truck traffic patterns to utilize Clark Street from the north or south of I-75. | The truck traffic at Clark will decline when the Gateway Project is completed. The removal of the Livernois/Dragoon interchange will relocate some truck traffic from south of I-75 to the ramps at Clark. |
| I Traf over 75 | The Detroit Public Schools District alerts you to necessity for redesigning school bus routes. | The school buses serving Southwestern High School are primarily oriented to vocational training, carrying SWHS students to and from the school during the day to distant locations where vocational training occurs. This means I-75 is the primary route. The Preferred Alternative maintains access to and from I-75. For those students using the two city of Detroit routes serving this area, those routes have been modified in collaboration with the Detroit Department of Transportation to minimize impacts. |
| I Traf over 75 | The proposed plaza area must preserv[e] . . . as many streets and pedestrian crossings spanning the freeway as is deemed satisfactory to the residents . . . and the business community's customers . . . | The Preferred Alternative will provide access across I-75 at Springwells, Green, Livernois, and Clark, plus five pedestrian crossings. |
| I Traf over 75 | Will the "new" medical/fire/police on Fort St. still be able to respond to calls. | Yes, project planners met several times to ensure that the Preferred Alternative preserves access for the Southwestern Public Safety Center. |
| I Traf over 75 | I very much object to any plan for plaza and freeway connections that eliminates or degrades the Junction Avenue overpass on I-75. Our company is on South Junction and we don't want to be cut off. | The Preferred Alternative will close Junction. Travel across I-75 then will occur via Clark Street or Livernois Avenue. |
| I Traf to 75 | It would be counterproductive . . . to disrupt the I-75 easy on and off ramps to . . . the Springwells Business District that is also a main artery to the West Vernor Business District. | The Springwells interchange will be reconstructed with full access maintained. The Springwells/Fort Street intersection will be improved. |
| I Traf to 75 | We would like to see a new dedicated truck route between Jefferson and Fort St. Possible solution: a truck route running along side of existing and newly proposed railways. | The DRIC will have little effect on truck traffic volumes to justify a new truck road as suggested. |
| I Traf to I-75 | It is imperative that these businesses [seventeen major employers] are consulted as to their traffic and truck routing needs. | The Preferred Alternative improves access to I-75 compared to any of the previously presented Practical Alternatives. Full interchanges are preserved at Springwells and at Clark, although the location for two of the Clark interchange ramps will be changed. Some access to the freeway in the vicinity of the existing Livernois interchange has been retained. Major businesses will be met with during the design phase of the project, which is standard procedure. |

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| I Traf to I-75 | Closing exits and entrances from Clark, Livernois and Springwells would continue the devastation initiated by the Gateway project and is completely unacceptable. | The Preferred Alternative improves access to I-75 compared to any of the previously presented Practical Alternatives. Full interchanges are preserved at Springwells and at Clark, although the location for two of the Clark interchange ramps will be changed. Some access to the freeway in the vicinity of the existing Livernois interchange has been retained. |
| I Transit | 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. | A meeting held with DDOT on September 25, 2008, concluded that rerouting of their two bus lines could be accomplished as documented in Section 3.5.6.1 of the FEIS. |
| I Transit | . . . the displacement of low-income families (30%) and the multitude of zero car households (25%) are a concern. . . a project of this magnitude could have a massive impact on our ridership. | The Preferred Alternative reduces the number of residential relocations to 257. For these households, and others in the area, transit use is less than 5 percent of all trips. The two Department of Transportation bus routes have been re-routed in collaboration with DDOT to minimize impacts. |
| I Vis | 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. | That discussion is expanded and included in Section 4.14 of the FEIS. |
| I Vis | [Bridge design] is just a matter of aesthetics. | Comment acknowledged. The bridge type is to be determined in the design phase. |
| I Vis | There really has to be adequate shielding, not just in terms of noise, but in terms of appearance, a sense of neighborhood. | MDOT will continue to adhere to Context Sensitive Solution principles as it moves forward into and through the project design phase. This work will take as its starting point the results of the Context Sensitive Solution workshops held during the DRIC environmental analysis phase of the work (see Section 6.2.1 of the FEIS). |
| I Vis | 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. | MDOT anticipates ongoing consultation with the State Historic Preservation Office on this subject as the project develops. A series of workshops have been held with the community on Context Sensitive Solutions to better integrate Fort Wayne into its surroundings. |
| I Vis | It's my preference, if there is a bridge, that it not be ostentatious in style. | The bridge type and design will be decided later, after the environmental phase of the project. |
| M AQ | For consideration of different mitigation features for emissions, the plaza area could look at truck staging facilities to have the truck engines turned off. | Trucks are now, and will continue to be required to turn off engines during U.S. Customs secondary inspections. That is noted at the end of Section 3.6.4.1 of the FEIS. |
| M AQ | What is MDOT proposing to do for Southwestern High School to mitigate the negative impact of the adjacent truck plaza where over potentially 5,000 trucks could be idling daily? | Analysis indicates no mitigation is required specific to Southwestern High School. Trucks will be at idle at toll booths and primary inspection. They will be required to turn off engines for any extended inspection. These activities are 1,500 feet from the back edge of the school building. |
| M AQ | 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. | MDOT's plans during construction are covered in Section 4.6 of the DEIS and FEIS. |
| M AQ | A 160 acre truck plaza . . . I understand that they don't turn off their engines. . . . We should expect best available technology to reduce pollution from idling trucks. | Trucks are already required to turn off their engines during secondary inspections, rather than idle. |
| M AQ | Because of . . . the cumulative impacts of multiple transportation and industrial operations . . . it is important that all efforts to minimize additional contribution of particulate matter in the community be undertaken as mitigation. | Mitigation is not required as no standards would be violated. Voluntary measures will be undertaken as noted in the last paragraph of Section 3.6 of the DEIS and FEIS and in Section 6 of the Air Quality Technical Report. |
| M AQ | Once the border crossing is opened . . . mitigation should include . . . anti-idling policies during truck inspections . . . | U.S. Customs and Border Protection already enforces anti-idling during secondary inspections and will continue to do so. |
| M AQ | Once the border crossing is opened . . . mitigation should include . . . air filtration systems for systems for sensitive receptors, including Southwestern High School . . . | Air filtration systems are not required as there are no adverse effects on Southwestern High School caused by the DRIC. |

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| M AQ | Once the border crossing is opened . . . mitigation should include . . . funding for air monitoring . . . including mobile source air toxics, PM2.5, PM10, SO2 and continuous EC/OC sampling, PM2.5 speciation measurements and continuous PM2.5. | Southeast Michigan already has the most comprehensive monitoring network in Michigan, which includes a monitor located at the south limit of Southwestern High School. It measures PM2.5, PM10, SO2, manganese, arsenic, cadmium, nickel, volatile organic compounds, and carbonyls. |
| M AQ | Once the border crossing is opened . . . mitigation should include . . . regular sweeping of roads . . . | The roads involved in the project are the plaza connection to Campbell and the ramps to I-75, which will be subject to normal MDOT maintenance. Other roads in Delray are under the jurisdiction of the City of Detroit. |
| M AQ | Once the border crossing is opened . . . mitigation should include . . . landscaping using native and non-invasive vegetation . . . | A statement has been added to the Green Sheet that landscaping will emphasize native vegetation and not include invasive species. |
| M AQ | Air quality mitigation for the school should be included . . . Through retrofitting area truck fleets with diesel reduction technologies. | By the year the project opens (2013), trucks will be six years into the transition to the clean engines required by EPA of all new diesel trucks beginning in 2007. |
| M AQ | Air quality mitigation for the school should include . . . Construction an indoor recreation facility for the school . . .an environmental justice issue. | There will be no need for such mitigation as there will be no adverse air quality effects on the school caused by the DRIC. |
| M AQ | . . . The CBA for the DIFT project may be instructive in the types of [air quality] mitigation . . . diesel emission control programs, anti-idling equipment, retrofitting of heavy equipment, indoor air filtering system for residential and institutional building located within a specific radius from the international border crossing system. | Idling occurs with toll payment and U.S. Customs inspections and clearance. Vehicle engines must be turned off during secondary inspection. By the year of the project opening (2013), trucks will be six years into the transition to the clean engines required by EPA of all new diesel trucks beginning in 2007. Pollutants of construction vehicles and dust will be controlled per MDOT contract specifications. |
| M AQ | Once the border crossing is opened . . . mitigation should include . . . anti-idling policies during truck inspections . . . | U.S. Customs and Border Protection already enforces anti-idling during secondary inspections and will continue to do so. |
| M AQ | Once the border crossing is opened . . . mitigation should include . . . air filtration systems for systems for sensitive receptors, including Southwestern High School . . . | Air filtration systems are not required as the DRIC will not have adverse impacts on Southwestern High School and other sensitive receptors. |
| M AQ | Once the border crossing is opened . . . mitigation should include . . . regular sweeping of roads . . . | The roads involved in the project are the plaza connection to Campbell and the ramps to I-75, which will be subject to normal MDOT maintenance. Other roads in Delray are under the jurisdiction of the City of Detroit. |
| M AQ | Section 3.6.4.2 . . . addresses emission factors for earthmover/ graders only . . . bulldozers, cement trucks, delivery trucks . . . used in construction should be measured . . . | Earthmovers and graders serve as surrogates for all equipment in the air quality analysis. The 11 tons of PM10 and 0.6 tons of PM2.5 compare to a level of concern (de minimis level) of 100 tons. So, the results show values that are less than ten percent of those triggering special consideration. The analysis covers off-road equipment. Cement and delivery trucks are on-road vehicles and must meet higher pollution standards. |
| M AQ | Section 4.6 states "Construction emissions may represent a large new source of PM2.5 emissions." How does this affect the general conformity requirements of the Clean Air Act? | The key word is "may." The mitigation activities are designed to ensure this does not occur. |
| M AQ | At a minimum, the District requests that ultra-low sulfur diesel fuel be required during construction activities. | Ultra-low sulfur fuel use will be required nationwide for non-road (including construction) vehicles by 2010, the year construction is to begin. |
| M AQ | . . . consider incorporating . . . : reducing diesel emissions by . . . implementing idle-reduction technologies and programs on the plaza and other areas . . . | Analysis indicates no mitigation is required specific to Southwestern High School. Trucks will be at idle at toll booths and primary inspection. They will be required to turn off engines for secondary inspection. |
| M AQ | It is critical that mitigation of localized air quality impacts be included in the FEIS and be funded as part of this project rather than in a community benefits agreement. | The DRIC will have no adverse air quality impacts, so mitigation is not required. |
| M AQ | Once the border crossing is opened . . . mitigation should include . . . regular sweeping of roads . . . | The roads involved in the project are the plaza connection to Campbell and the ramps to I-75, which will be subject to normal MDOT maintenance. Other roads in Delray are under the jurisdiction of the City of Detroit. |

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| M AQ | Air quality mitigation for the school should be included . . . buffering with large trees and other vegetation to help mitigate diesel particulate and dust from traffic. | A landscape buffer where the plaza is south of Southwestern High School will be provided. |
| M AQ | . . . diesel reduction devices and tactics must be employed throughout the area, particularly in and around local schools. | Diesel reduction is what EPA is addressing in their nationwide requirements for cleaner engines and fuels. |
| M AQ | Any increase in traffic in the locally affected community must include an increase in the quality of air . . . through a requirement to improve any and all sources of air quality compromise. | Air quality will improve as noted in Section 3.6 of the DEIS and FEIS. Other actions will be taken by SEMCOG and MDEQ to achieve air quality attainment, consistent with the State Implementation Plan. |
| M AQ | . . . localized air quality impacts should be mitigated . . . at Beard Early Childhood Center . . . | The DRIC will have no adverse air quality effects at the Beard Center. |
| M AQ | We [EPA] recommend . . . Routing to reduce truck traffic through residential areas and away from more sensitive receptors . . . | As Section 3.6.3.1 of the DEIS and FEIS notes, eliminating the Livernois/Dragoon interchange will substantially reduce truck traffic on these two arterials that penetrate the densely residential Southwest Detroit area. |
| M AQ | We [EPA] recommend . . . Minimizing travel within plazas . . . | The Preferred Alternative includes Plaza P-a which has a direct routing of traffic through the plaza that minimizes travel compared to the other plaza alternative not chosen. |
| M AQ | We [EPA] recommend . . . Implementation of border delay reductions . . . | Border delay will be a function of staffing levels by U.S. Customs and Border Protection and the enforcement of security rules set by the U.S. and Canadian governments. |
| M AQ | Research published by EPA investigators suggest that high sound barriers . . . may significantly reduce downwind concentration of pollutants . . . along roadways. | Sound barriers are planned as noted in Section 3.7 of the DEIS and FEIS. |
| M AQ | Research published by EPA investigators suggest that . . . mature vegetation . . . may significantly reduce downwind concentration of pollutants . . . along roadways. | Vegetation will be placed in the buffer around the plaza as permitted by U.S. Customs. A clear, unobstructed view will influence the landscape design. Mature vegetation will be retained as noted on the Green Sheet. |
| M Benefits | Project . . . benefits [should] occur locally . . . [with] components of economic, environmental, and neighborhood revitalization to this host community Benefits should include issues like air quality monitoring, air filtering for schools, diesel emission reduction programs, housing development and renovation, work force redevelopment and training, and commercial redevelopment in the area. | Analysis of cumulative impacts is required and is included in Section 3.14 of the FEIS. Sections 4.21 and 4.22 on mitigation, specifically the Green Sheet, discuss coordination efforts to improve Delray. |
| M Benefits | There should be an enforceable community benefits program | All mitigation included in the FEIS is enforceable. |
| M Benefits | Have you considered starting a college scholarship fund for graduates or something compensatory? | It is not possible as federal and state transportation funding does not allow such programs. |
| M Benefits | If the DRC study does go through . . . we would . . . like to see . . . people . . . have available for them new homes built in the Delray neighborhood . . . I've actually talked to people from Michigan State Housing Development Authority . . . | MDOT and FHWA will not build new houses. They will provide compensation for relocation. If the private and/or public sector were to build housing in Delray to accommodate the relocatees, then new housing could be available. There are also residential properties within Delray that are viable candidates for rehabilitation. A potential residential historic district has been identified in "West Delray" that if formally recognized would allow investors the opportunity to apply for federal and/or state historic preservation tax credits. |
| M Benefits | The community is developing . . . A community benefits agreement that would be mutually signed off by people in the community and the State of Michigan. We'd like to see . . . redevelopment of the housing, air quality improvement, air filtering systems in the neighborhood for the schools, diesel emission reduction, work force and development and training funding for our residents in the neighborhood, and more commercial development. | Responses to the requested "benefits" are included, to the extent possible, in the mitigation section (Sections 4.21 and 4.22) of the FEIS. |

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| M Benefits | We developed a mission statement: "We envision a community in which area residents and a new publicly owned international border crossing will mutually co-exist and benefit from each other. Our vision includes those areas in Southwest Detroit impacted by the border crossing and specifically a viable and redeveloped Delray neighborhood. The foundation of this vision will be set forth in a legally binding community benefits agreement that includes implementation of the DRIC study community land use plan relating to residential and economic development, environmental mitigation, and other benefits that are primarily for the Delray neighborhood and other impacted area residents. And then finally without endorsing any outcome beyond this vision statement, we support the continued funding, community involvement, and then completion of the DRIC study." | Comment acknowledged. |
| M Benefits | With respect to relocating the current residents . . . If they could build homes in our areas, and turn some of our renters into homeowners and help them enhance their quality of life, that would be a plus. | Based on applicable relocation rules and regulations, renters will be adequately compensated for their relocation. MDOT and FHWA will not build new houses. They will provide compensation for relocation. If the private and/or public sector were to build housing in Delray to accommodate the relocatees seeking replacement, then new housing could be available. |
| M Benefits | We know jobs are coming. Who are these jobs going to, and are they going to be for the union laborers? | Jobs will be filled by the contractors that build the crossing system. It is not now known whether they will be union jobs. Jobs at U.S. Customs will likely be union as they are now. |
| M Benefits | I am the Chair for Detroit Community Initiative and we do housing development. We're building the east side . . . and those types of things can also benefit Delray. | Comment acknowledged. |
| M Benefits | There are at least four major facilities that are either under construction or consideration - the Ambassador Bridge Gateway Project . . . 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. | Analysis of cumulative impacts is required and is included in Section 3.14 of the FEIS. Sections 4.21 and 4.22 on mitigation, specifically the Green Sheet, discuss coordination efforts to improve Delray. |
| M Benefits | Our 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? | Construction jobs will be filled by the contractors that build the crossing system. Indirect jobs stem from money spent and are not "allocated." |
| M Benefits | The best way for this to occur is the formulation of a legally binding community benefit agreement between the residents, local organizations and the State of Michigan and other appropriate governmental entities. | MDOT and FHWA have approved mitigation for adverse effects as cited in Sections 4.21 and 4.22 of the FEIS, specifically the Green Sheet. Several items are what the community terms "benefits." All mitigation items are legally binding. |
| M Benefits | Central to . . . redevelopment is the need to build new housing and commercial development in Delray, which will replace single resident housing and businesses, taken for the DRIC project and to build infill housing for residences lost to community neglect. | MDOT and FHWA have approved mitigation for adverse effects that is cited in Sections 4.21 and 4.22 of the FEIS, specifically the Green Sheet. Several items are what the community terms "benefits." Other community requested items, such as building new housing, are not the purview of MDOT nor FHWA and must be undertaken by other public and/or private sectors. |
| M Benefits | People's Community Services would therefore like to formally request a meeting with MDOT and the DRIC study group to discuss the role People's Community Services could play in the redevelopment of Delray and . . . the DRIC usage plans. . . . | Such meetings were held on June 26, July 10 and August 20, 2008. |
| M Benefits | The best way for this to occur is the formulation of a legally binding community benefit agreement between the residents, local organizations and the State of Michigan and the Federal Highway Administration. | MDOT and FHWA have approved mitigation for adverse effects as cited in Sections 4.21 and 4.22 of the FEIS. Several items are what the community terms "benefits." All mitigation items are legally binding. |

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| M Benefits | Locating a nationally-important economic project in this area without restorative investment in the community would be akin to locating a business on a superfund site without the environmental cleanup. Thus local investment for community development should be considered integral to the development of the overall project. | Comment acknowledged. |
| M Benefits | A community benefits agreement should include but not be limited to: building new homes . . .infill housing . . .mitigating homes and businesses. . . | MDOT and FHWA have approved mitigation for adverse effects that is cited in Sections 4.21 and 4.22 of the FEIS, specifically the Green Sheet. Several items are what the community terms "benefits." Other community requested items, such as building new housing, are not the purview of MDOT nor FHWA and must be undertaken by other public and/or private sectors. |
| M Benefits | [A CBA should] redevelop existing areas and create new commercial areas. | The government cannot create new commercial areas. It can help support with infrastructure development and other mitigation measures covered in Sections 4.21 and 4.22 of the FEIS, specifically the Green Sheet. |
| M Benefits | [A CBA should provide] funding for workforce training and new business incubation. | In anticipation of large projects, programs such as the Road Construction Apprenticeship Readiness (RCAR) program have recently been developed and funded to address having an available workforce in this area. In addition a Disadvantaged Business Enterprise Resource Center has been developed and implemented in Mexicantown. This center will address business capacity and training issues. |
| M Benefits | [A CBA should] insure easy access to comprehensive health services within the impact area. | MDOT and FHWA have approved mitigation for adverse effects that is cited in Sections 4.21 and 4.22 of the FEIS, specifically the Green Sheet. Several items are what the community terms "benefits." Other community requested items, such as building new housing, are not the purview of MDOT nor FHWA and must be undertaken by other public and/or private sectors. CHASS, a health services agency, will remain and expand in the area. Its access will not be negatively affected. |
| M Benefits | [A CBA should] maintain sidewalk and street connections for . . . All forms of non-motorized transportation throughout the impact area and between the north and south sides of I-75. . . . | MDOT and FHWA have approved mitigation for adverse effects that is cited in Sections 4.21 and 4.22 of the FEIS, specifically the Green Sheet. Several items are what the community terms "benefits." Other community requested items, such as building new housing, are not the purview of MDOT nor FHWA and must be undertaken by other public and/or private sectors. |
| M Benefits | [A CBA should] designate and enforce truck routes to keep trucks off of residential streets. | MDOT cannot deny access to commercial vehicles on its roads. The City of Detroit can post "No Trucks" signs by ordinance. |
| M Benefits | [A CBA should] facilitate a legislative remedy or provide compensation to reduce the negative impact of the "pop up tax" on relocated residents. | MDOT cannot lobby for legislative initiatives. |
| M Benefits | All relocated residents . . . be offered replacement housing of equivalent or higher value. | Right-of-way acquisition and relocation procedures must be follow the Uniform Relocation Act on a project sponsored by the Federal Highway Administration and MDOT. They are summarized in Section 4.1 of the DEIS and FEIS. |
| M Benefits | [A CBA should] protect all historical and archeological sites. | National Register and National Register-eligible sites are protected by law. See Section 3.9 of the DEIS and FEIS. |
| M Benefits | [A CBA should] protect and promote Fort Wayne, including providing attractive and easy access. | Fort Wayne is recognized as a key asset for the community and is a historically significant resource. MDOT will work closely with the community and other champions to assure access improvements and increased visibility following a commitment to quality in design and CSS principles. |
| M Benefits | [A CBA should] provide for non-motorized transportation infrastructure in the entire bridge project. . . . | MDOT and FHWA have approved mitigation for adverse effects that is cited in Sections 4.21 and 4.22 of the FEIS, specifically the Green Sheet. Several items are what the community terms "benefits." Other community requested items, such as building new housing, are not the purview of MDOT nor FHWA and must be undertaken by other public and/or private sectors. |
| M Benefits | The CBA should be implemented concurrently with the DRIC. | MDOT and FHWA have approved mitigation for adverse effects that is cited in Sections 4.21 and 4.22 of the FEIS, specifically the Green Sheet. Several items are what the community terms "benefits." Other community requested items, such as building new housing, are not the purview of MDOT nor FHWA and must be undertaken by other public and/or private sectors. |

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| M Benefits | Improvements envisioned by the community for the area around the school should be implemented, including along Fort Street. | MDOT and FHWA have approved mitigation for adverse effects that is cited in Sections 4.21 and 4.22 of the FEIS, specifically the Green Sheet. Several items are what the community terms "benefits." Other community requested items, such as building new housing, are not the purview of MDOT nor FHWA and must be undertaken by other public and/or private sectors. |
| M Benefits | The school [Southwestern] should receive . . . Positive investments . . . such as in sports and technological equipment. | MDOT and FHWA have approved mitigation for adverse effects that is cited in Sections 4.21 and 4.22 of the FEIS, specifically the Green Sheet. Several items are what the community terms "benefits." Other community requested items, such as building new housing, are not the purview of MDOT nor FHWA and must be undertaken by the public and/or private sectors. |
| M Benefits | Various plans have been developed to create greenways and . . . non-motorized transportation in southwest Detroit . . . The DRIC is an opportunity for collaboration to achieve these greenway links. | The River Rouge Gateway and West Riverfront Gateway greenway are shown in Figure 3-26. The Preferred Alternative will provide bike lanes on Jefferson Avenue and Clark Street and non-motorized paths in the buffer around the plaza to complement these plans. |
| M Benefits | We urge MDOT and other appropriate state and federal agencies to discuss implementing a community benefits agreement. | MDOT and FHWA have approved mitigation for adverse effects that is cited in Sections 4.21 and 4.22 of the FEIS, specifically the Green Sheet. Several items are what the community terms "benefits." Other community requested items, such as building new housing, are not the purview of MDOT nor FHWA and must be undertaken by other public and/or private sectors. |
| M Benefits | We ask that a meeting be set with representatives of the Community Benefits Coalition Board within 60 days of the announcement of the Preferred Alternative. | Such meetings were held on June 26, July 10 and August 20, 2008. |
| M Benefits | I am a member of the Community Benefits Agreement Coalition and support the vision statement and the formal comments this group has submitted. | Comment acknowledged. |
| M Benefits | Equally important . . . is the need . . .to revitalize . . . urban neighborhoods. . . We must insure . . . Infrastructure . . . is designed in a manner that limits its . . . impacts on residential and commercial retail development. | DRIC infrastructure does that, to the extent practical, in light of engineering standards and security measures that must be applied. Work dealing with Context Sensitive Solutions will continue throughout the project's following phases to support, to the extent practicable, neighborhood revitalization. |
| M Benefits | One of the most critical mitigation activities that must be incorporated into the DRIC Study Final Environmental Impact Statement is a comprehensive economic development strategy that focuses on Michigan's significant international trade strengths. | The DRIC mitigation plan (Sections 4.21 and 4.22 of the FEIS) includes some funding to develop such a strategy. |
| M Benefits | Several entities have articulated the need for an economic strategy designed to develop the Great Lakes region, Michigan, and southeast Michigan as a global logistics and transportation hub. . . .The DRIC Study should advocate for such a coordinated strategy as well as provide funding and leadership to forward this critical initiative. | The DRIC mitigation plan (Sections 4.21 and 4.22 of the FEIS) includes some funding to develop such a strategy. |
| M Benefits | Equally important . . . is the need . . .to revitalize . . . urban neighborhoods. . . We must insure . . . Infrastructure . . . is designed in a manner that limits its . . . impacts on residential and commercial retail development. | DRIC infrastructure does that, to the extent practical, in light of engineering standards and security measures that must be applied. Work dealing with Context Sensitive Solutions will continue throughout the project's following phases to support, to the extent practicable, neighborhood revitalization. |
| M Benefits | There also is support for land bridge treatments that host local pocket parks, such as that which crosses Interstate 696 in Oak Park. | While the number of pedestrian crossings will be maintained after the DRIC project is completed, they will not be "land bridges." |
| M Benefits | The Community Benefits Agreement Coalition should be empowered to guide the process of developing a Community Benefits Agreement . . . A final CBA must provide legal rights for community signatories. | The DRIC mitigation items included in the ROD are enforceable through legal action. |
| M Benefits | . . . the best way for this to occur is the formulating of legally binding community benefits agreement . . . | The DRIC mitigation items included in the ROD are enforceable through legal action. |
| M Benefits | The Community Benefits Coalition requests a meeting with MDOT . . . within 60 day of the announcement of the Preferred Alternative. | Such meetings were held on June 26, July 10 and August 20, 2008. |

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| M Benefits | One of the most critical mitigation activities that must be incorporated into the DRIC Study Final Environmental Impact Statement is a comprehensive economic development strategy that focuses on Michigan's significant international trade strengths. | The DRIC mitigation plan (Sections 4.21 and 4.22 of the FEIS) includes some funding to develop such a strategy. |
| M Benefits | The enhancements MDOT is exploring with residents of Delray are also setting a precedent that will result in costly community benefits for future major developments. | Comment acknowledged. |
| M Benefits | The Community Benefits Agreement could include, but should not be limited to, implementing the Delray Neighborhood Land Use Plan, the building of new housing and commercial developments, no decrease in air quality, additional green space, jobs . . . to . . . residents and . . . job training. | MDOT has developed mitigation included in Sections 4.21 and 4.22 of the FEIS, specifically the Green Sheet. A number of items called "benefits" by the local community are included there. |
| M Benefits | There should also be a fund established for accomplishing these [CBA] development activities . . . | All mitigation listed in the FEIS, specifically the Green Sheet, will be funded by MDOT/FHWA and other partnering public agencies. |
| M Benefits | We [Southwest Detroit Business Association] are in support of all the comments of the Community Benefits Coalition. | Comment acknowledged. |
| M Benefits | The plan will require the relocation of hundreds of residents and the closing or relocation of several businesses. In order to justify this dramatic change, I would want to see the full business case and relocation strategy. My understanding is that the community redevelopment scenarios envisioned within the DRIC study are not traditionally funded by FHWA funds, and as such, should be disclosed to the community that they are separate and distinct from the mitigation expected from the DRIC project. | MDOT has developed mitigation included in Sections 4.21 and 4.22 of the FEIS, specifically the Green Sheet. A number of items called "benefits" by the local community are included there. |
| M Benefits | I want to be assured that any public crossing includes a Community Benefits Agreement that is a separate legally binding document that includes mitigation of the environmental, housing, air quality, business and community impact caused by the public Bridge for the Delray Neighborhood and any other area in SW Detroit that is impacted by the public bridge. | MDOT and FHWA have approved mitigation for adverse effects as cited in Sections 4.21 and 4.22 of the FEIS. A number of items called "benefits" by the local community are included there. All mitigation items are legally binding. |
| M Benefits | No build is not an option. Without careful planning . . . the neighborhood will continue to be overrun with trucks. . . Please continue your work and listen to community stakeholders. . . make investments to support people . . . this neighborhood . . safe borders . . . | Comment acknowledged. |
| M Buffer | The scenery around is going to be one brick wall At least put up some kind of a greenery, trees, or, you, something to make it look nice. | The buffer between the plaza and the adjacent land uses will consist of a fence and/or vegetation. The buffer landscape plan will be developed during the design phase, in conjunction with the requirements of the U.S. Department of Homeland Security. |
| M Buffer | 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. | Such buffers will be provided as indicated in Section 4.3 of the FEIS. |
| M Buffer | . . . consider incorporating . . . : noise barriers and vegetative buffering to reduce the noise from construction and traffic and to mitigate against dust . . . | The buffer between the plaza and the adjacent land uses will consist of flat grassy areas with low shrubs and a clear line of sight, per the Department of Homeland Security. A landscape plan will be developed during the design phase, in conjunction with these requirements. |
| M Cons | The Gateway Project . . . limits all traffic going downtown via 75. If the bridge should go forward, in about three years . . . it isn't going to get any better. | A Maintenance of Traffic Plan and Motorist Information Plan will be developed for the DRIC project during the design phase. The DRIC will not require the extensive road closings of I-75 necessitated by the Gateway Project. See Section 4.17 of the FEIS. |
| M Cons | The development of a second span across the Detroit River will increase impervious surface A storm water management system that avoids discharge, but rather collects, detains, and treats on site should be developed as part of the project. | See Section 4.8 of the FEIS. |

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| M Cons | 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. | See Section 4.9 of the FEIS. |
| M Cons | Compliance with and a permit under Part 91 (Soil Erosion and Sedimentation Control) if PA 451 of 1994 . . . may be required. | See Section 4.7 of the FEIS. |
| M Cons | 0.70 acres of wetland have been identified 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. | See Section 4.10 of the FEIS. |
| M Cons | The FEIS needs to incorporate . . . mitigation . . . for the construction phase. . . limiting the age of on-road [construction] vehicles . . . | Either vehicle age will be limited or diesel particulate traps or oxidation catalysts will be encouraged. |
| M Cons | The FEIS needs to incorporate . . . mitigation . . . for the construction phase . . . minimizing engine operations . . . | Minimizing engine running time is economical for contractors. MDOT can add engine idling restrictions to contract specifications. |
| M Cons | The FEIS needs to incorporate . . . mitigation . . . for the construction phase . . . restricting activities around Southwestern High School and other sensitive receptors . . . | Restriction of construction around sensitive receptors such as Southwestern High School is noted in Section 4.6 of the DEIS and FEIS. |
| M Cons | The FEIS needs to incorporate . . . mitigation . . . for the construction phase . . . instituting fugitive dust control plans . . . | Fugitive dust control plans are included in standard MDOT construction specifications as noted in Section 3.6.4.2 of the FEIS. |
| M Cons | The FEIS needs to incorporate . . . mitigation . . . for the construction phase . . . using existing power sources . . . rather than temporary power generators. | Emissions from generators and similar small engines are now regulated by EPA. |
| M Cons | The FEIS needs to incorporate . . . mitigation . . . for the construction phase . . . sweeping of roads to minimize fugitive dust. | Sweeping roads is part of the MDOT-required fugitive dust control plans (Section 4.6 of the DEIS and FEIS). |
| M Cons | The FEIS needs to incorporate . . . mitigation . . . for the construction phase . . . use of . . . cleaner burning fuels when possible. | MDOT will require use of ultra-low sulfur fuel in advance of the EPA requirement (Section 4.6 of the FEIS). |
| M Cons | The Detroit Public Schools District alerts you to detrimental air quality effects from construction activities and from increased pollution. | Sections 3.6.4.2 and 4.6 of the DEIS and FEIS outline the measures to be taken to control air pollution during construction. |
| M Cons | Dust controls have not been defined. Will water trucks be utilized? Will street sweeping be included? How often will this be completed? | Fugitive dust control plans are included in standard MDOT construction specifications as noted in Section 3.6.4.2 of the FEIS. |
| M Cons | Section 4.17 - Maintaining Traffic During Construction does not address construction traffic. . . . The District request that no construction vehicles be allowed on Fort and Post streets during school hours and the hour before and after school. | Haul routes are typically established to avoid sensitive receptors. The DRIC project already has a track record here, as haul routes were successfully implemented during the brine well drilling program. |
| M Cons | Soon after that project [Gateway Project] would be completed, we would likely experience a similarly massive construction site if the DRIC is implemented . . . | A four-year construction duration is anticipated - 2010 through 2013. This follows the completion of the Gateway project in 2009. |
| M CSS | 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. | Section 4 of the FEIS notes under Visual Effects that Context Sensitive Solution (CSS) meetings to address the specifics of landscaping will be held during the design process. |
| M CSS | All new roadway designs and changes should incorporate existing non-motorized and greenway plans, and maximize new potential connections to the river front and adjacent communities. | All replacement bridges over I-75 and the replacement pedestrian bridges (Section 3.5.6 of the DEIS and FEIS) will be built consistent with Americans with Disabilities guidelines and have full non-motorized access. Jefferson Avenue and Clark Street will be repaved and restriped to add bike lanes. The buffer around the plaza will include non-motorized paths. |

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| M CSS | It is imperative that the growth and revitalization of the host community is equally as important of an objective of the DRIC Study as increasing international border crossing capacity. The Context Sensitive Solutions community workshops . . . represent a strong commitment . . . As the DRIC Study proceeds . . . similar workshops should recommence. . . It will be important to . . . complete the neighborhood land use plan through the design phase of the project. | The Context Sensitive Solutions work will continue into the DRIC design phase. Land use planning and zoning is the purview of the City of Detroit. |
| M Cul | Approximately 15-20 sites are eligible for the National Register of Historic Places . . . Rather than demolish these building, if all involved would consent, these building could be moved to the Fort Wayne area. | The Preferred Alternative will result in the demolition of two National Register eligible sites, St. Paul AME Church and Kovacs Bar (Section 5). Moving a National Register building in not usually considered prudent and sometimes eliminates the characteristics which qualify the building as eligible. Moving buildings to Fort Wayne in not consistent with the Fort's theme and future plans. |
| M Cul | [On page ES-27] Is consideration to physically relocate historic structure[s] a possibility; to relocate displaced residents who desire to remain in Delray, to a "new" neighborhood community? | Relocation of the impacted historic structure - St. Paul AME Church - is not likely to occur based on contact with the pastor. Relocation of other, non-historic structures, is an option but contact with owners indicates this is not a likely option either. |
| M Gen | The proposed mitigation for environmental justice impacts is virtually meaningless, consisting only of mandatory relocation assistance and a required security fence for the proposed plaza. | The disproportionate impacts on minority and low-income populations are discussed in Section 3.1.5.2 of the FEIS. Mitigation of them is presented in Section 4.2 of the FEIS. |
| M Gen | The DEIS does not full identify those mitigation strategies associates with each alternative and therefore substantially limits the commentary that can be provided as part of the DEIS process. | Additional mitigation is included in Section 4 of the FEIS. |
| M Gen | The implementation of all mitigation must be concurrent with the implementation of any international border crossing. | Correct. |
| M Gen | No project of this magnitude should ever be undertaken without sufficient resources provided to the community for its own professional analysis and consideration. | Comment acknowledged. |
| M Gen | Under GSA [General Services Administration] policies, . . . new construction . . . must be certified through the Leadership in Energy and Environmental Design (LEED) . . . system. . . Projects are encouraged to achieve the LEED Silver level. Please document in the FEIS how DRIC will implement this GSA policy. | The GSA is conducting its own Feasibility Study concurrent with the EIS. Its stated goal is to achieve a LEED Silver level status. |
| M House | . . . It is critical that . . .housing units are retained within southwest Detroit. There are several community development corporations with a successful portfolio of housing projects in southwest Detroit . . . These entities should be included in the planning . . . | The development of housing will be the responsibility of public and private entities outside MDOT and FHWA. |
| M House | Specific action should be taken to stop the fragmentation of the remaining community space near and specific to Westend and Dearborn streets . . . [like] proposed residential infill housing and recreational parks (refer to the community-based Delray land use concept). | Redevelopment of Delray will be aided by the mitigation measures listed in Section 4 of the FEIS. Public and private sector entities will be needed to redevelop the area, including building infill housing. That will not be done by MDOT and FHWA. |
| M Infra | The DRIC Study Final Environmental Impact Statement should include, as a mitigating activity, funding for and a specific timeline for a coordinated and comprehensive community-based transportation infrastructure project plan. | Redevelopment of Delray will be aided by the mitigation measures listed in Section 4 of the FEIS. Public and private sector entities will be needed to redevelop the area, including building infill housing. That will not be done by MDOT and FHWA. |
| M Infra | The DRIC Study Final Environmental Impact Statement should include, as a mitigating activity, funding for and a specific timeline for a coordinated and comprehensive community-based transportation infrastructure project plan. | Redevelopment of Delray will be aided by the mitigation measures listed in Section 4 of the FEIS. Public and private sector entities will be needed to redevelop the area, including building infill housing. That will not be done by MDOT and FHWA. |
| M Noise | Will a noise wall be built around the plaza adjacent to the school? | A wall will be built around the plaza which will buffer noise. |

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| M Noise | Infrastructure design that least impacts noise levels should be incorporated . . . since stakeholders . . . will bear a primary burden . . . Mitigation for increase noise from the project should be addressed in the FEIS. | As noted in Table 3-23 of the DEIS, no sensitive receptors around the plaza require mitigation. The areas of vehicle activity are far enough away that noise levels are low. Table 3-25 lists the reasonable and feasible noise walls that will be implemented with the Preferred Alternative. |
| M Noise | It is important that the FEIS contain a commitment to conduct noise monitoring. | The noise modeling follows FHWA and MDOT guidelines and is adequate to predict future project noise. |
| M Noise | . . . The DEIS suggests [noise] barriers may not be feasible in all situations; that additional streets would need to be cut off . . . for barriers to be effective . . . | Streets would not be cut off by noise walls. |
| M Noise | Infrastructure design that reduce noise levels should be implemented along the Interstate- 75, adjacent residential areas, and Southwestern High School. | As noted in Table 3-23 of the DEIS, no sensitive receptors around the plaza require mitigation. The areas of vehicle activity are far enough away that noise levels are low. Table 3-25 lists the reasonable and feasible noise walls that will be implemented with the Preferred Alternative. |
| M Noise | Noise monitoring must be an ongoing activity following construction. | The noise modeling follows FHWA and MDOT guidelines and is adequate to predict future project noise. |
| M Noise | I prefer Alt. #3 or #11 - for sound issue and would like to have noise walls to not interfere with our view to downtown and river. | Alternatives #3 and #11 were eliminated due to impacts on historic properties. The river is not visible from Morrell and I-75. The downtown will be along the line of the noise wall, not on the other side of it. |
| M Permits | In general we have no comments. . . 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. . . T. This analysis will also provide information on what type of marking and lighting will be required for the project. | Form has been filed. |
| M Permits | A permit for [0.01 acres of wetlands] will be required from LWMD, under Part 303 . . . The mitigation ratio . . . Would be 1:1. | Issue addressed in Section 4.10 of the FEIS. |
| M Permits | The bridge crossing . . . Will require a permit under Part 301, Inland Lakes and Streams, and Part 31, Water Resources Protection, of the NREPA. . . . Proper storm water runoff controls should be implemented to ensure that there is no direct runoff from the bridge into the Detroit River. | Issue addressed in Section 4.8 of the FEIS. |
| M Permits | LWMD staff reviews projects for consistency with Michigan's Coastal Management Program (MCMP), . . . Provided no valid objections based on valid environmental concerns are received during the public notice period and all required permits are issued and compiled with, no adverse impacts to coastal resources are anticipated. Upon issuance of all necessary permits, this project will be consistent with MCMP. | Comment acknowledged. |
| M Permits | All local permits should be included in the FEIS. | Local permits will not be known until the design phase. So they are not listed in the FEIS. |
| M Permits | The Detroit Public Schools District alerts you to increased emission and poor air quality emanating from portable bituminous and concrete plants during construction activities. | MDEQ has specific permitting rules related to such plants. See Section 4.6 of the DEIS and FEIS. |
| P | I would request that at the time when the Michigan entity of this gets completed related to the American portion of the border, at the same time when the Canadians have finalized their Record of Decision, that you . . . print up both at the same time in the same type of brochure . . . so we have to move this project forward . . . [without] arguments and indecisions and discontinuity. | The end-to-end alternative was announced by the Canadians on June 18, 2008. The U.S. concurred. The official identification of the Preferred Alternative is included in the FEIS (Section 2.3). |
| P | Will an opportunity be provided to consider the findings of [the Canadian environmental process] within the context of the FEIS or even before then? | The FEIS reports on the Canadian findings in the Indirect and Cumulative Impacts section. Reference is made to supporting technical reports and their availability at www.partnershipborderstudy.com . Comments on the Canadian findings should be directed to Roger Ward of the Ministry of Transport Ontario. |

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| P | Once the study is completed and the preferred option presented, the decision to proceed or not is out of your control, but a wonderful effort has been made to make the host community aware of what can be done as far as improving their quality of life and economic status. | The decision on a Preferred Alternative has been made by the Partnership on an end-to-end basis. |
| P | There is an obvious need for better coordination and timing with the Canadian environmental process that has yet to issue a document for public review and comment describing the proposed project in Canada (including the customs plaza and roadway connection plans) | The Canadians are proceeding in a timely manner with their process and the Partnership is coordinating activities between the countries on a continuous basis. It is noted that the Canadian process does not allow preparation of its environmental documents until the Preferred Alternative is chosen. |
| P | It is our hope that the DRIC study, which has cost taxpayers hundreds of millions of dollars and significant energy, effort and work, comes to closure and a decision on the bridge is made expeditiously. | The study has cost about \$28 million to date. The DRIC decision process continues to advance at a reasonable pace. |
| P | 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. . . . 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. | Comment acknowledged |
| P | We [U.S. Coast Guard] have completed our review of the DRIC DEIS and have no comments. | Comment acknowledged. |
| P | As part of a four year process, the DEIS is the first milestone in the conclusion of the overall study. Following this process, we encourage further timely completion of the Final Environmental Impact Statement (FEIS), determination of the Preferred Alternative and submission to both federal governments for the Record of Decision. We look forward to the conclusion of this process in 2008 to comply with the original intent and needs of the partnership. | Comment acknowledged. |
| P | The context of this DEIS is twofold. First there is an overriding policy context. In addition there is a factual context. | Comment acknowledged. |
| P | There are at least three dimensions within the policy context: CEQ requirements; the President's agreement with the Prime Minister of Canada as stated on 21 August 2007; and the US government requirement that any new international border crossing requires a Presidential Permit before it can be constructed. | Comment acknowledged. |
| P | The second aspect of the policy context is the President's 21 August 2007 statement. . . . Note that the statement does not commit the US and Canadian governments to any particular mode of transportation. | President Bush's statement includes the following, "the safe and secure movement of trade and travelers . . ." implying a passenger mode alone would not be adequate. |
| P | The third and final aspect of the policy context is that if any "development of enhanced capacity" . . . involves the construction of a new bridge or tunnel . . . A Presidential Permit is required. The US Department of State processes applications | Comment acknowledged. The U.S. State Department is a cooperating agency. |
| P | The factual context of the DEIS is that regrettably it is but one of three environmental statements . . . for three proposed international crossing projects. | MDOT is aware of the Environmental Assessment dated April 2007 submitted by the Detroit International Bridge Company to the U.S. Coast Guard. MDOT is not aware of any NEPA document related to a new river tunnel or change to an existing tunnel. |

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| P | Presumably an environmental statement will be required for each of the three Detroit River crossing proposals by the Canadian Government . . . | Transport Canada in its capacity as a member of the Border Partnership, reports to the Partnership on the status of an Environmental Assessment it is preparing on the DIBC proposal for a replacement span of the Detroit River. That proposal is still under review, with more information needed from DIBC. For the DRIC, the Ontario Ministry of Transport is preparing a Selection of Technically Preferred Alternative Report. It and other technical work will support the Ontario Draft and Final Environmental Assessments and Canadian federal Draft and Final Screening Reports. MDOT is not aware of any reports being prepared to meet the requirements of the Ontario Environmental Assessment Act or Canadian Environmental Assessment Act related to new or reconstructed river tunnels. |
| P | In conclusion, the DEIS needs to be redone by the Office of the U.S. Secretary of Transportation rather than by the Federal Highway Administration or another modal administration in order to objectively satisfy the CEQ requirement for a DEIS | The FEIS has been reviewed for legal sufficiency and found adequate. |
| P | The DEIS should be modified to conspicuously indicate that one reasonable alternative to building new bridges over the Detroit River at this time is to route more traffic over the BWB [Blue Water Bridge] as long as the BWB has the ability to absorb more traffic. | The travel demand model revealed that depending on where a traveler wanted to go not enough trips would likely use Pt. Huron rather than Detroit-Windsor because the difference in travel times was too large. |
| P | I want to be sure that FHWA is aware that the law has, and continues to, restrict MDOT's participation in the DRIC Study . . . Currently, the public comment period on the DEIS is set to expire on April 29, 2008. Because the legislative oversight hearings will not be completed before then, we believe that the public comment period should be extended for at least six months. | The comment period was extended 30 days or until May 29, 2008. |
| P | For fiscal year 2006-2007, the enacted budget law directed that MDOT "shall not, directly or indirectly, expend any funds appropriated [through line-item appropriations] for design or right-of-way acquisition associated with a new crossing of the Detroit River between Detroit, Michigan and Windsor, Ontario." | Comment acknowledged. |
| P | For the 2007-2008 fiscal year (Public Act. 129 of 2007, Sec. 384) the law imposes more sever limits on MDOT. . . . [it] prohibits MDOT from binding the State in any way to future action of any DRIC project recommendation. . . . The law also specifies that "any additional spending to implement any recommendation of the DRIC Study will require prior approval of the full legislature." | Comment acknowledged. |
| P | There will likely be a number of process-related lessons learned from the implementation of the Gateway Project that should be implemented during the construction phase for anew international bridge system. | Comment acknowledged. |
| P | . . . The U.S. NEPA process has become disconnected from the Canadian Environmental process. . . . Because of this disconnect, your DEIS does not - and cannot provide a complete project description. . . . It is contrary to sound public policy for the U.S. agencies to select a Preferred Alternative . . . and move forward to a final environmental process when Canada is so far behind in its own process. | The U.S. and Canadian environmental processes have been fully integrated from the outset of the Detroit River International Crossing Study per Section 2 of the DEIS and FEIS. |
| P | FHWA should have used a first-tier DEIS to allow public involvement in the crucial screening decisions. | Such an approach is at the discretion of FHWA. It was not chosen. |

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| P | CEQ regulations state that a draft environmental impact statement "must fulfill and satisfy to the fullest extent possible the requirement established for final statements" . . . the DEIS postpones its review of potential disproportionate impacts to low-income residents of Delray. . . . the DEIS explicitly acknowledges that its full review of environmental justice impacts on low-income Delray resident swill occur at a time when the public will have little chance to comment on the adequacy of that review. . . . this procedure blatantly violates CEQ regulations . . . | CEQ regulations were fully complied with by incorporating public input to the DEIS combined with refined data to fully assess disproportionate and adverse effects on populations protected by the Environmental Justice Executive Order. |
| P | . . . Postponed analyses . . . illustrate the way in which the DEIS . . . has rushed to judgment. Environmental reviews that are time-consuming, or that require significant mitigation, or that may not be favorable to the DRIC project, are consistently put off, eliminating the public's opportunity to understand and comment on them. | The claim of "postponement leading to rushed judgment" is not understandable. Public engagement of all DRIC materials has allowed the fullest evaluation of project impacts and appropriate mitigation of adverse effects. |
| P | The first study done clearly stated that the only viable area was what was called the central corridor . . . yet this study was thrown away, with the new study coming to the same conclusion. | The first study was a feasibility study. It concluded work should advance to the environmental impact phase. These two studies are necessary parts of the process for mega projects such as the Detroit River International Crossing. |
| P | I would simply ask that we make sure that all appropriate United States environmental reviews are completed . . . prior to making any final decision. | Comment acknowledged. |
| P | We also believe that a tiered environmental review is appropriate for this project. | Such an approach is at the discretion of FHWA. It was not chosen. |
| P | Canada has abandoned its commitment to improve access to existing crossings, and decided instead to act a competitor to those crossings. | This is not a matter for response by MDOT or FHWA. |
| P | This shift in Canadian policy against improvements to Ambassador Bridge roadway access was blindly approved in a 2005 letter from FHWA Regional Administrator James Steele. . . . Worse, Regional Administrator Steele acquiesced to Canada's "unwillingness to consider" the Ambassador Bridge replacement span as an option, even though governments in the U.S. were investing hundreds of millions in the Congressionally-approved Gateway Project and even though the Ambassador Bridge's minimal environmental impacts and benefits to regional mobility placed it among the highest ranking U.S. alternative in preliminary DRIC studies. | No blind approvals were ever provided by FHWA. The letter of James Steele that concurred with results of the Evaluation of Illustrative Alternatives was a studied and appropriate assessment of the end-to-end data of that portion of the study process. The Ambassador Bridge replacement span was not included on the list of Practical Alternatives for the reasons articulated in Regional Administrator Steele's letter and covered in Section 2.1 of the DEIS and FEIS. The "Congressional approval" consisted of allowing direct access between the U.S. Interstate system and the Ambassador Bridge (which had previously been prohibited because the Ambassador Bridge is a private entity). |
| P | Regional Administrator Steele overstepped his authority by making a significant decision (i) solely on the basis of Canadian desires, (ii) in direct conflict with the U.S. alternative rankings, (iii) that flouts the will of Congress, and (iv) wastes the millions of dollars currently being spent on the Ambassador Bridge Gateway Project. | No blind approvals were ever provided by FHWA. The letter of James Steele that concurred with results of the Evaluation of Illustrative Alternatives was a studied and appropriate assessment of the end-to-end data of that portion of the study process. The Ambassador Bridge replacement span was not included on the list of Practical Alternatives for the reasons articulated in Regional Administrator Steele's letter and covered in Section 2.1 of the DEIS and FEIS. The "Congressional approval" consisted of allowing direct access between the U.S. Interstate system and the Ambassador Bridge (which had previously been prohibited because the Ambassador Bridge is a private entity). |
| P | . . . connecting the Highway 401 directly to the Ambassador Bridge . . . would also avoid stranding the hundreds of millions of dollars already invested by U.S. taxpayers in improvement to existing crossing, including the Blue water Bridge and the Ambassador Bridge corridor . . . | The Bluewater Bridge and Ambassador Gateway projects have distinct purposes, needs and independent utility, as does the DRIC project. |
| P | Relying on the 2004 DRIC traffic projection would directly contradict Haw's past handling of another northern cross-border project . . . in Calais, Maine. | The traffic modeling has been established on sound data and principles. It includes a risk analysis to address "unknown unknowns." It's traffic modeling procedures and results have been vetted by a team of internationally-recognized peers who concur the models are sound and effective predictors of future traffic. |

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| P | A recent study prepared by the U.S. General Services Administration (:GSA") as part of its July 2007 Detroit Cargo Inspection Facility Master Plan offers a far lower forecast of the same traffic than the DRIC study. . . the GSA described them as a "high" traffic scenario, and developed its own, independent forecasts using "Standard GSA Protocol" . . . It would be arbitrary and capricious to rely on the DRIC traffic study when an independent federal agency such as GSA reaches strikingly different conclusions . . . | The GSA study, to which the comment refers, states as follows: "In addition to projections derived through standard GSA/Regal protocols (emphasis added), the most relevant forecasts available for this application are derived from the Detroit River International Crossing (DRIC) process, . . . These forecasts are driven by economic forecasts and a cross border regional travel demand models, and the traffic outputs are higher than the standard statistical projections derived through the GSA/Regal Protocol. Taken together, these two approaches inform low and high traffic forecasts that yield a range of facility requirements used in the development of master plan layout options. Options developed within this context can be evaluated for the adaptability to the actual traffic flows experienced over the planning horizon." Using the DRIC forecast in this light is neither arbitrary nor capricious. |
| P | On the U.S. side, Department of Transportation under Secretary for Policy Jeffrey Shane wrote a letter in April 2007 stating that federal agencies should "proceed expeditiously with appropriate federal input and support." . . . Meeting notes . . . attached to that letter describe a "Unified Federal Approach to DRIC" that would "ensure [u]ninterrupted progress in DRIC planning and construction" . . . This memo raises a number of serious questions about agency conflicts of interest, lack of fundamental fairness and arbitrary and capricious agency action. | The U.S. agencies recognize the important economic value of the Detroit-Windsor corridor. Since international trade is a federal prerogative it is only natural that the agencies responsible for international trade and commerce should work together to assure that corridor trade is not impeded by congestion and capacity issues. As is our practice due diligence will be taken throughout the process. |
| P | When does the public get to comment on the final DRIC "choice/configuration?" | As is the case for most NEPA projects, the Preferred Alternative is identified in the FEIS. Prior to that, Local Advisory Council and public meetings were held to keep the public informed and solicit input to identify the Preferred Alternative. |
| PN Cap | Current capacity at the border will be overloaded by as early as 2015 if high traffic growth occurs and by 2035 if traffic grows more slowly. . . It is prudent and appropriate to plan now. | Comment acknowledged. |
| PN Cap | The DRIC project has always been portrayed as satisfying a need to accommodate imminent, dramatic increases in traffic volume. | It is unclear where such portrayals have been made or by whom. The traffic forecasts show capacity being exceeded between 2015 and 2035. |
| PN Cap | The DEIS's capacity calculations fail to account for the Ambassador Bridge Enhancement Project. . . By increasing the number of lanes on the Ambassador Bridge from four to six, the Ambassador Bridge Enhancement Project will increase that crossing's physical capacity by 50%. | The Ambassador Bridge Enhancement Project Environmental Assessment submitted to the U.S. Coast Guard April 24, 2007 states "the second span will provide four full service traffic lanes plus two lanes dedicated to low risk commercial travelers." (p.1) "These FAST lanes do not represent an expansion of capacity since they are restricted to those that have been pre-approved for their use." (p 43). Capacity is not otherwise discussed in that EA. As it was stated that the FAST lanes do not contribute to capacity (and it is unclear how that could be so), the position of the DIBC at the time of the writing of the DRIC FEIS was interpreted to be that a new bridge would not add capacity. Nonetheless, travel demand modeling was performed for both a four-lane Ambassador Bridge and a six-lane Ambassador Bridge. The analysis of the six-lane condition is reported in Section 3.14.3 of the FEIS. |
| PN Cap | . . . the mere inclusion of the Ambassador Bridge Enhancement Project as part of baseline traffic capacity moves the earliest conceivable date for traffic "breakdown" from 2015 to approximately 2040. | DEIS page ES-3 notes capacity involves: 1) roads leading to the Ambassador Bridge and Detroit-Windsor Tunnel; 2) customs processing; 3) and, the crossings themselves. An increase in capacity on a bridge does not change the capacity of the approach roads. The Enhancement Project EA states, "Finally, the construction of any new roads linking the Ambassador Bridge with Highway 401 is outside the scope of the Ambassador Bridge Enhancement Project and would be within the exclusive control of Canadian and Ontario government agencies." Because the Enhancement Project includes no provision for a roadway capacity expansion, the existing capacity limitations of the approach corridor remain. |

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| PN Cap | Backups on the Ambassador Bridge appear to be entirely due to how many truck CI [Customs Inspection] inspection posts are open. Our members have repeatedly observed that when three or fewer truck CI posts are open, incoming traffic to the U.S. is backed up all the way across the bridge. . . . The solution to reducing truck congestion is to ensure that more truck CI posts are open at all times. | As stated in Section 1.2.1.3 of the DEIS, ". . . . At least 44 different Canadian and U.S. agencies have jurisdiction over border operations. There are almost 4,500 new or revised regulations introduced by Canadian federal and provincial governments every year that affect border travel. So, while the limitations on U.S. and Canadian access roads and the border crossings can be addressed by physical improvements, changing its plazas where border processing delays regularly occur is not just more booths and manpower, but rules and regulations set by policy makers in the U.S. and Canada." |
| PN Con | When Phase One of the Gateway Project is completed in 2010, vehicles traveling over the Ambassador Bridge into the United States will pass through improved plazas and have direct access to I-75, I-94, and I-96. These changes will fully satisfy any need for improved "system connectivity" and plaza "operations and processing capability" on the U.S. side of the border. | The Gateway Project also does not address the need for crossing options (redundancy) in case of incidents. It will improve plaza operations in the U.S., but connectivity on one side of the border alone is meaningless without connectivity on the other side. |
| PN Con | . . . the federal government of Canada and the provincial government of Ontario signed a Memorandum of Understanding in September 2002 in which they committed to \$300 as an "investment in the Windsor Gateway." . . . (attached as Exhibit A). | The "Windsor Gateway" referred to in that memorandum is not the DIBC "Gateway Project." The funds referenced in that memorandum have since been expended on a number of projects which complied with the stated goals/intentions/objectives of that memorandum. |
| PN Econ Sec | My comment [is] about letting the people here tonight know what happens actually down at the border. We . . . brokers . . . facilitate the U.S. Customs. We are licensed . . . to release shipments from all over the world So this opens up such a trade that you would not believe all over the world This is going to be a really big situation for the economy. | Comment acknowledged. |
| PN Econ Sec | It is critical that the bi-national partners take the steps to expand international border crossing infrastructure, and enhance the seamless flow of goods and people in order to strengthen the vitality of the Great Lakes economic region. | Comment acknowledged. |
| PN Econ Sec | As chairs of our respective transportation committees in the Michigan House of Representatives we cannot express enough how important this project is to the future of the Detroit region, the State of Michigan and international trade. | Comment acknowledged. |
| PN Fore | International traffic has been declining since 1999. | While auto traffic is down, truck traffic is up since 1999 reaching its highest level ever on the Ambassador Bridge in 2006. Truck traffic is an indicator of trade and the health of the economies of the two largest trading partners in the world. Providing economic security is part of the DRIC project's purpose. |
| PN Fore | I'd like to comment on the graph [of] travel demand versus capacity. It indicates . . . 1999 was a peak year for . . . the Ambassador Bridge; it's started to decline. You have it going to year 2004, but you've not continued this graph up to current time It is my understanding that . . . seven years . . . we're down about 39 percent . . . which says the Ambassador Bridge is not being utilized extensively to its capacity. | Auto traffic is down because of changes/enhancements in border security procedures, economic conditions, and changes in the value of the U.S. currency, to cite a few reasons. But, truck traffic is up since 1999 reaching its highest level ever on the Ambassador Bridge in 2006. Truck traffic is an indicator of trade and the health of the economies of the two largest trading partners in the world. Providing economic security is part of the DRIC project's purpose. |
| PN Fore | This graph is hypothetical so it's meaningless It has to be updated to prove what they wish to make us believe - that there is a need. | The graph depicts past and future trends and the time period that the Detroit-Windsor Tunnel and the Ambassador Bridge will be at capacity. Every forecast is "hypothetical" but not meaningless. Nonetheless, it is recognized that auto traffic is down because of changes/enhancements in border security procedures, economic conditions, and changes in the value of the U.S. currency, to cite a few reasons. But, truck traffic is up since 1999 reaching its highest level ever on the Ambassador Bridge in 2006. Truck traffic is an indicator of trade and the health of the economies of the two largest trading partners in the world. Providing economic security is part of the DRIC project's purpose. |

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| PN Fore | The Blue Water Bridge built a second span in 1996. At that time there was roughly six million vehicles going across it annually. It is now down to somewhere about five million and a half, I believe. They projected . . . nine million . . . [It] never did come to fruition, nor is the bridge being used. So that second span was a waste of money, as I see it. | The 1982 forecasts of traffic crossing the border in the Port Huron-Sarnia area have proven to be accurate. |
| PN Fore | The owners of the Ambassador Bridge state that there will actually be less traffic crossing our border in the next 35 years. And I've heard tonight . . . things are going to pick up after continual downturn of another eight years. | The DRIC forecasts reflect growth in truck traffic by 2035 and a rebounding in auto traffic with some growth compared to today. |
| PN Fore | . . . there appears to be no information in any of the DEIS documentation regarding the assumptions in the travel demand forecasting process of the border crossing fees for the years for which the traffic forecasts have been made . . . The DEIS should be amended to clarify the traffic forecasting assumptions and to quantitatively evaluate at least the fare policy options identified above. | As stated in Section 3.5.1.1 of the DEIS and FEIS, tolls at the crossings have been considered equal so no prejudice is cast on one crossing over another. |
| PN Fore | The DEIS uses[s] 2004 as a base year. We now have three more years of data and the DEIS should be amended to establish 2007 as the base year. . . Traffic volumes on at least the BWB {Bluewater Bridge} declined considerably between the end of 2004 and the end of 2007. . . . The DEIS should be modified to present the traffic counts for the AMB [Ambassador Bridge], DWT [Detroit-Windsor Tunnel] and BWB and amend the forecast for the planning horizon year, 2034. | On the issue of a base year, every analysis must establish a point at its outset from which to project. Nonetheless, it is recognized that auto traffic is down from the base year because of changes/enhancements of border security procedures, economic conditions, and changes in the value of the U.S. currency, to cite a few reasons. But, truck traffic is up since 1999 reaching its highest level ever on the Ambassador Bridge in 2006. Truck traffic is an indicator of trade and the health of the economies of the two largest trading partners in the world. Providing economic security is part of the DRIC project's purpose. Finally, the DRIC model projects trucks within five percent of actual crossings of the Ambassador Bridge in 2005, 2006 and 2007. No modifications of the DEIS are needed. |
| PN Fore | Because significant fuel price changes have an impact on travel demand the travel demand forecast contained in the DEIS should be redone. . . . In addition, the change . . . gives impetus to identify . . . the improvement of intermodal freight services as a reasonable alternative. | Figure 1-3 in the DEIS and FEIS shows the combined effects of all the risk factors that could move forward or delay the time when a new or expanded crossing is required. The Extreme High Scenario consists of a combination of High Trade Growth and High Passenger Car Demand Scenarios. The Extreme Low Scenario is a combination of the Low Trade Growth, Diversion to Intermodal Rail, High Diversion to St. Clair River crossing and Low Passenger Car Demand Scenarios. Such unlikely scenarios would advance the year in which capacity is reached by five years to about 2015 or delay it by fourteen years to about 2034, respectively. This information can be found on the project Web site under Canadian Reports - "Travel Demand Forecasts, 2005," Section 6.2.5. Such effects on cross border traffic are part of the risk analysis in the DRIC forecasting. Reference is made to 3.5.1.4. |
| PN Fore | . . . the 2034 peak hour PCEs [passenger car equivalents] projection derived above [by the commenter] is slightly less than 90% of the available capacity in place at this time, a result which suggests the need for providing more highway capacity across the Detroit River is not as urgent as is suggested in Figure S-2. . . The DEIS should be revised to explicitly state how the peak period PCE statistic was derived from the year 2034 travel demand forecast and the justification for the procedure . . . | Information regarding the peak periods and PCE development is fully documented in the Traffic Analysis Technical Report, which were publicly available at the depositories and on the Web at www.partnershipborderstudy.com . Go to Canadian Reports then to the document entitled "Travel Demand Forecasts, 2005." See Section 6.1. |
| PN Fore | Neither the DEIS nor the TDF [travel demand forecasting] contains an analysis of the sensitivity of the hourly PCE for 2034 to changes in assumption made in the calculations . . . It is possible to provide incentives to travel at times other than peak periods. The DEIS also should be amended to address the sensitivity of the peak hour travel forecasts to the implementation of various peak period travel disincentives. | The travel demand models assign traffic based upon travel time and cost. Trip tables were established based upon analysis of risks so variations in items such as fuel costs are accounted for. Reference is made to the project Web site at www.partnershipborderstudy.com . Go to Canadian Reports then to the document entitled "Travel Demand Forecasts, 2005." See Section 6.2. Additionally, MDOT does not own, manage or operate the existing crossings in Detroit. Therefore there is no ability to impose the kinds of incentives/disincentives suggested by the commenter. |

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| PN Fore | The DEIS requires amendment to clearly present both existing and forecasted travel volumes between Detroit and Upstate New York that uses travel through Ontario as a short cut. | Those data are included in the travel model which uses a network covering all of the U.S. and Canada and also is based on survey trip data which includes that NY/Detroit traffic which is a relatively small percentage of total traffic. |
| PN Fore | Given the non-availability of 2005 [origin-destination] data, and given that practical alternatives to the DRIC project can not be evaluated without such data, it is imperative that the DEIS be amended to include the 2005 origin-destination information and then released to the public for additional comment. | The best available data were used to develop the DRIC travel forecasting models. Refer to the project Web site. Go to Canadian Reports then to the document entitled "Travel Demand Forecasts, 2005." See Section 6.1.. They have been reviewed by a peer group and found to be acceptable. No further data collection is needed nor will be conducted for the DRIC FEIS. |
| PN Fore | The record of working documents that are a part of the DEIS should be amended to include the TDF [travel demand forecasting] report. | All appropriate reference material has been made available to the public. This includes material on the Web site. Go to Canadian Reports then to the document entitled "Travel Demand Forecasts, 2005." Also, go to U.S. Reports to the Level 1, Level 2, and Level 3 Traffic Analysis Reports. |
| PN Fore | Although the DEIS was released in 2008, it continues to rely on the now-outdated traffic estimates used three years earlier in the 2005 Draft Scoping Information document. | The latest information has been used. When SEMCOG released a socioeconomic forecast with lower growth than projected earlier, a sensitivity analysis was performed and reported in Section 3.2.1.3 of the FEIS. It did not substantively change the forecast travel demand. |
| PN Fore | . . . the traffic forecasts that appear in the DEIS were made using data from 2004. The forecasts were not revised to include subsequent years, even though the DEIS was not published until 2008. . . The actual data show a decrease in both passenger and commercial trips between 2005 and 2007. . . the ever-increasing error in the DEIS's traffic figures would compound exponentially over a 30-year horizon. Any agency decision that is based on this sort of massive projection error would readily qualify as arbitrary and capricious. | Auto traffic is down because of changes/enhancements of border security procedures, economic conditions, and changes in the value of the U.S. currency, to cite a few reasons. But, truck traffic is up since 1999 reaching its highest level ever on the Ambassador Bridge in 2006. Truck traffic is an indicator of trade and the health of the economies of the two largest trading partners in the world. Providing economic security is part of the DRIC project's purpose. |
| PN Fore | Recently, the Southeast Michigan Council of Governments ("SEMCOG") released an updated population forecast for the seven-county region . . . The January 2008 Induced Demand Analysis Technical Report recognizes the existence of the more recent SEMCOG forecasts, but claims that the smaller number of people living in the region would not significantly reduce cross-border traffic, and "does not materially change the overall border crossing assignment pattern . . ." . . . This conclusion is inconsistent with the larger population and economic trends discussed [in the submitted comment letter]. | The conclusion in the Induced Demand Technical Report is consistent with and takes into account the lower SEMCOG population and employments forecasts the commenter notes. (Refer to Section 3.5.1.4.) Cross border travel is driven by trade/truck traffic that is a function of broad national issues rather than the number of people and jobs in the SEMCOG region. With that said, it is recognized the auto traffic forecast for 2035 indicates it will just about return to 2000 levels. That forecast is more sensitive to population and employment. The 2035 auto traffic forecast is reasonable. |
| PN Fore | In January 2008, a report prepared for the City of Windsor observed a "substantial decline" in employment during 2007 . . . The Conference Board of Canada is now predicting -0.3% annual declines in employment between 2007 and 2010. In the U.S., SEMCOG employment forecast envision job losses that began in 2000 continuing through 2008. . . Were the DEIS to use these more recent employment numbers, it would again have to lower its traffic projections. | The conclusion in the Induced Demand Technical Report (Section 2.1) is consistent and takes into account the lower SEMCOG population and employment forecasts the commenter notes. Cross border travel is driven by trade/truck traffic that is a function of broad national issues rather than the people and jobs in the SEMCOG region alone. With that said, it is recognized the auto traffic forecast for 2035 indicates it will just about return to 2000 levels. Auto traffic is more sensitive to population and employment. The 2035 auto traffic forecast is reasonable. Regarding trucks, recent U.S. Department of Transportation data indicate April 2008 set a new record for U.S. trade with our North American neighbors, at \$74.3 billion. (The previous high was \$74.2 billion in October, 2007). Trade with Canada alone reached \$48.9 billion, a 15% increase from April 2007. April also marked the 14th straight month that surface trade with Canada improved compared to the same month the previous year. Michigan was the leading state in trading with Canada, at \$6.4 billion, a full 33% higher than the number two state, Illinois. These numbers support the conclusion that the DRIC crossing is needed sooner rather than later to address economic security. |

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| PN Fore | The DEIS's commercial vehicle traffic prediction is based on outdated and overly aggressive commodity trade forecasts. . . using the more realistic projections of the Freight Analysis Framework ("FAF2") commodity flow database developed by FHWA in cooperation with the Bureau of Transportation Statistics . . . project[s] a decline in Detroit-Windsor freight activity in the automotive sector until 2015, and overall lower growth in that sector between 2004 and 2035. | Response to be determined. |
| PN Fore | The decline in traffic between Detroit and Windsor since 1999 calls into question the basic premises of the DEIS's traffic projection. | Auto traffic is down because of changes/enhancements of border security procedures, economic conditions, and changes in the value of the U.S. currency, to cite a few reasons. But, truck traffic is up since 1999 reaching its highest level ever on the Ambassador Bridge in 2006. Truck traffic is an indicator of trade and the health of the economies of the two largest trading partners in the world. Providing economic security is part of the DRIC project's purpose. |
| PN Fore | . . . the DRIC Study Travel Demand Forecast report, which is the basis for DEIS Figure 1-3, assumes that the mode share between trucking and rail at both Detroit crossing . . . will remain constant in future years. But, in reality several factors are driving freight shippers to shift from trucking to rail . . . | The DRIC model uses an increase in intermodal traffic of 20% by 2030 which reduces truck traffic at the border by almost five percent in 2030. That reduction then is taken into consideration in projecting a 128% growth in truck traffic by 2035. |
| PN Fore | Because U.S. auto manufacturers have lost market share, each car built with U.S. and Canadian parts results in many fewer border crossings of parts and finished vehicles. . . each of these companies has announced a substantial reduction in the selection of vehicle models they will produce. All of this means hat parts will become more generic, and therefore the truck transport of differing, individualized parts will diminish . . . | That statement is not consistent with the latest surface transportation U.S. and Canadian data for April 2008. They show an increase of 15.9 percent in the value of trade compared to April of 2007. Michigan was the greatest trading partner with Canada in April 2008 at \$6.4 billion. It is also noteworthy that most, if not all, of the "foreign" automakers with plants in the U.S. who are gaining market share also have plants in Canada and they contribute to the cross-border traffic. The relative locations of those plants indicate that the Detroit - Windsor border crossing is the most likely route for this traffic. |
| PN Fore | Personal border crossings . . . Likely have been permanently affected by the opening of three hotel casinos in Detroit . . . in 2004, when the DRIC project made its traffic projections, the currency exchange rate was around \$1 U.S. dollar to \$1.37 Canadian dollars . . . Due to the favorable purchasing position of the U.S. dollar, Windsor's restaurants flourished and personal car traffic across the border was increased. The exchange rate today is nearly one-to-one. | Figure 1-3 in the DEIS and FEIS shows the combined effects of all the risk factors that could move forward or delay the time when a new or expanded crossing is required. The Extreme High Scenario consists of a combination of High Trade Growth and High Passenger Car Demand Scenarios. The Extreme Low Scenario is a combination of the Low Trade Growth, Diversion to Intermodal Rail, High Diversion to St. Clair River crossing and Low Passenger Car Demand Scenarios. Such unlikely scenarios would advance the year in which capacity is reached by five years to about 2015 or delay it by fourteen years to about 2034, respectively. This information can be found on the project Web site under Canadian Reports - "Travel Demand Forecasts, 2005," Section 6.2.5. Such effects on cross border traffic are part of the risk analysis in the DRIC forecasting. Reference is made to 3.5.1.4. |
| PN Fore | . . . the strongest proponents of the DRIC project, as well as the sponsoring agencies, must concede the need to collect several more years of current and readily available traffic data before deciding whether it is necessary to open a new border crossing in the Detroit-Windsor area. | Reasonable and secure crossing options are needed now. The sensitivity to traffic volumes is related to financing a new bridge. A separate and independent investment grade traffic study will follow the FEIS. |
| PN Fore | If one combines the BWB annual traffic volume changes since 2004 . . . with the AMB and DWT . . . it is readily apparent that the total annual traffic demand on the three crossings combined has declined significantly since 2004 - by 12% for passenger car traffic, 2% for commercial traffic, and 7% for PCEs . . . It can be concluded that traffic growth forecasts on which the DRIC DEIS relied are not consistent with the reality of traffic flows observed during 2007. Even if the approximate 3% CAGR [compound annual growth rate] . . . eventually is realized, the date that the capacity of the existing crossings will be matched by traffic demand perhaps will be on the order of five years later than . . . in Figure S-2 . . . | Figure 1-3 in the DEIS and FEIS shows the combined effects of all the risk factors that could move forward or delay the time when a new or expanded crossing is required. The Extreme High Scenario consists of a combination of High Trade Growth and High Passenger Car Demand Scenarios. The Extreme Low Scenario is a combination of the Low Trade Growth, Diversion to Intermodal Rail, High Diversion to St. Clair River crossing and Low Passenger Car Demand Scenarios. Such unlikely scenarios would advance the year in which capacity is reached by five years to about 2015 or delay it by fourteen years to about 2034, respectively. This information can be found on the project Web site under Canadian Reports - "Travel Demand Forecasts, 2005," Section 6.2.5. Such effects on cross border traffic are part of the risk analysis in the DRIC forecasting. Reference is made to 3.5.1.4. |

DRIC Comments on DEIS and Responses

| Response Category | Comment | Response |
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| PN Fore | . . . it is imperative that the DEIS be amended to include the 2005 origin-destination information and then released to the public for additional comment. | Figure 1-3 in the DEIS and FEIS shows the combined effects of all the risk factors that could move forward or delay the time when a new or expanded crossing is required. The Extreme High Scenario consists of a combination of High Trade Growth and High Passenger Car Demand Scenarios. The Extreme Low Scenario is a combination of the Low Trade Growth, Diversion to Intermodal Rail, High Diversion to St. Clair River crossing and Low Passenger Car Demand Scenarios. Such unlikely scenarios would advance the year in which capacity is reached by five years to about 2015 or delay it by fourteen years to about 2034, respectively. This information can be found on the project Web site under Canadian Reports - "Travel Demand Forecasts, 2005," Section 6.2.5. Such effects on cross border traffic are part of the risk analysis in the DRIC forecasting. Reference is made to 3.5.1.4. |
| PN Fore | I believe that we need to spend more time understanding the increased demand for the new bridge in light of traffic patterns over the past eight to ten years. | Auto traffic is down because of changes/enhancements of border security procedures, economic conditions, and changes in the value of the U.S. currency, to cite a few reasons. But, truck traffic is up since 1999 reaching its highest level ever on the Ambassador Bridge in 2006. Truck traffic is an indicator of trade and the health of the economies of the two largest trading partners in the world. Providing economic security is part of the DRIC project's purpose. |
| PN Fore | The traffic numbers used in the DRIC in its DEIS are outdated and flawed. Even the DRIC has recognized this by announcing that it is engaging new traffic experts. | A separate and independent investment grade traffic study will follow the FEIS. At this time, however, the DRIC has not engaged new traffic experts. One of the DRIC partners, Transport Canada, has initiated an investment grade traffic study to advance its Canadian planning in financing its portion of the project. |
| PN Fore | The proof of the continuation of the long range downturn in future traffic is . . . The Ontario Trucking Association's report dated Monday, May 19, 2008 stating the cross border trucking was down 8.4% since 2000. . . Tuesday, May 20, 2008 Wall Street Journal concludes that the prediction that the U.S. automobile market will recover to a level of 20 million vehicles a year is incorrect . . . the report of StatsCanada that tourist travel from the US to Canada in March 2008 was 12.4% lower than in March 2007. . . Wednesday, May 21, 2008 Detroit Free Press reports that Detroit Metropolitan Airport cannot support the increased air travel predictions . . . | Figure 1-3 in the DEIS and FEIS shows the combined effects of all the risk factors that could move forward or delay the time when a new or expanded crossing is required. The Extreme High Scenario consists of a combination of High Trade Growth and High Passenger Car Demand Scenarios. The Extreme Low Scenario is a combination of the Low Trade Growth, Diversion to Intermodal Rail, High Diversion to St. Clair River crossing and Low Passenger Car Demand Scenarios. Such unlikely scenarios would advance the year in which capacity is reached by five years to about 2015 or delay it by fourteen years to about 2034, respectively. This information can be found on the project Web site under Canadian Reports - "Travel Demand Forecasts, 2005," Section 6.2.5. The comment is not consistent with the latest surface transportation U.S. and Canadian data for April 2008. They show an increase of 15.9 percent in the value of trade compared to April of 2007. Michigan was the greatest trucking partner with Canada in April 2008 at \$6.4 billion. These data support the conclusion that the DRIC crossing is needed sooner rather than later to address economic security." The report regarding tourist travel can be addressed by other comments dealing with automotive traffic volumes. |
| PN Fore | The . . . DEIS . . . articulates several needs for a new border crossing between Detroit and Windsor . . . The first of these needs, critiqued at length in DIBC and CTC's Initial Comments, hinges on the false assertion that traffic volumes will increase dramatically in the long run. | The DEIS does not assert that the traffic volumes will increase dramatically. It does state that they will increase using reasonable forecasting assumptions. |

DRIC Comments on DEIS and Responses

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| PN Fore | The arguments in DIBC and CTC's Initial Comments were confirmed when GSA performed its own study of the traffic here at issue and concluded that future growth will be far lower than what the DRIC study predicts. | The GSA study the comment refers to states as follows: "In addition to projections derived through standard GSA/Regal protocols (emphasis added), the most relevant forecasts available for this application are derived from the Detroit River International Crossing (DRIC) process, These forecasts are driven by economic forecasts and a cross border regional travel demand models, and the traffic outputs are higher than the standard statistical projections derived through the GSA/Regal Protocol. Taken together, these two approaches inform low and high traffic forecasts that yield a range of facility requirements used in the development of master plan layout options. Options developed within this context can be evaluated for the adaptability to the actual traffic flows experienced over the planning horizon." |
| PN Fore | Even if the DRIC study's traffic model were viable, the inputs it uses are four years old; newer data shows that actual traffic volumes are far lower than the DRIC model predicted. | The best available data were used to develop the DRIC travel forecasting models. They have been reviewed by a peer group and found to be acceptable. No further data collection is needed nor will be conducted to complete the FEIS. |
| PN Fore | Has your projection of 128% truck traffic increase by 2035 taken into account 1) price of fossil fuel, 2) decline in N. American auto industry, and, 3) the projection of added hassle factors to travel across the border that would likely make business limit their crossings and consolidate operations to eliminate previously easy trips? | Such factors are inherently incorporated into the forecasts by the risk analysis procedure. Reference is made to 3.5.1.4. |
| PN Gen | DRIC was and still is not a solution for transportation growth in this region. | Providing economic and physical security are the purpose of the DRIC. The DRIC Preferred Alternative is the solution of the Border Transportation Partnership for meeting this purpose. |
| PN Gen | There is absolutely no transportation justification for a DRIC bridge in this corridor. | The justifications are economic and physical security. |
| PN Gen | This project is critical and extremely important to the success of the Michigan economy. We strongly recommend this project proceed expeditiously and should be a priority for all levels of government. | Comment acknowledged. |
| PN Gen | While useful, the existing tunnel bus service is insufficient to truly meet the needs of the traveling public. | The need for the project is driven by trade, i.e., travel by truck not bus. Further, according to published data, Bus service crossing the border has declined over the past several years. Since this service is demand driven, that would indicate a lack of demand....not an unserved surplus. |
| PN Gen | It is critical that the bi-national partners take the steps to expand international border crossing infrastructure, and enhance the seamless flow of goods and people in order to strengthen the vitality of the Great Lakes economic region. | Comment acknowledged. |
| PN Gen | The DEIS's stated need for the DRIC project is based on unrealistically optimistic traffic growth forecast. . . . Among the needs for the DRIC project identified in the DEIS, the claimed need for additional border crossing capacity in the near future stands out as most essential to the project's rationale. | A new border crossing is needed in the Detroit-Windsor area to: * Provide safe, efficient and secure movement of people and goods across the Canadian-U.S. border in the Detroit River area to support the economies of Michigan, Ontario, Canada and the U.S. * Support the mobility needs of national and civil defense to protect the homeland. To address future mobility requirements (i.e., at least 30 years) across the U.S.-Canada border, there is a need to: * Provide new border-crossing capacity to meet increased long-term demand; * Improve system connectivity to enhance the seamless flow of people and goods; * Improve operations and processing capability in accommodating the flow of people and goods at the plazas; and, * Provide reasonable and secure border crossing options in the event of incidents, maintenance, congestion, or other disruptions. |

DRIC Comments on DEIS and Responses

| Response Category | Comment | Response |
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| PN Gen | <p>... the 2005 Draft Scoping Information document for the DRIC project identified the "needs" ... The first need on the list was the provision of "new border crossing capacity to meet increased long-term demand." Draft Scoping Information ("DSI") at 6 (emphasis in original). In addition, two of the three other needs identified in the scoping document - better system connectivity and improve processing capability - related directly to the feasibility study's forecast increase in traffic volumes.</p> | <p>A new border crossing is needed in the Detroit-Windsor area to:</p> <ul style="list-style-type: none"> * Provide safe, efficient and secure movement of people and goods across the Canadian-U.S. border in the Detroit River area to support the economies of Michigan, Ontario, Canada and the U.S. * Support the mobility needs of national and civil defense to protect the homeland. <p>To address future mobility requirements (i.e., at least 30 years) across the U.S.-Canada border, there is a need to:</p> <ul style="list-style-type: none"> * Provide new border-crossing capacity to meet increased long-term demand; * Improve system connectivity to enhance the seamless flow of people and goods; * Improve operations and processing capability in accommodating the flow of people and goods at the plazas; and, * Provide reasonable and secure border crossing options in the event of incidents, maintenance, congestion, or other disruptions. |
| PN Gen | <p>The DEIS consequently proclaims that "a solution is needed" that "[p]rovides adequate vehicle capacity to handle vehicle demand." ... That "solution," ... Is an entirely new border crossing.</p> | <p>A new border crossing is needed in the Detroit-Windsor area to:</p> <ul style="list-style-type: none"> * Provide safe, efficient and secure movement of people and goods across the Canadian-U.S. border in the Detroit River area to support the economies of Michigan, Ontario, Canada and the U.S. * Support the mobility needs of national and civil defense to protect the homeland. <p>To address future mobility requirements (i.e., at least 30 years) across the U.S.-Canada border, there is a need to:</p> <ul style="list-style-type: none"> * Provide new border-crossing capacity to meet increased long-term demand; * Improve system connectivity to enhance the seamless flow of people and goods; * Improve operations and processing capability in accommodating the flow of people and goods at the plazas; and, * Provide reasonable and secure border crossing options in the event of incidents, maintenance, congestion, or other disruptions. |
| PN Gen | <p>Because it foresees the existing Detroit-Windsor crossings as having sufficient capacity for as few as seven more years of service, the DEIS concludes that a completely new border crossing is needed immediately.</p> | <p>The immediacy stems from the need for redundancy. The need for a completely new border crossing is immediate. The schedule for implementation is designed to move forward as quickly as practicable to address that need.</p> |
| PN Gen | <p>Revising the DEIS's traffic forecasts to include more recent data and the Ambassador Bridge Enhancement Project eliminates the supposed "need" for a new border crossing.</p> | <p>A new border crossing is needed in the Detroit-Windsor area to:</p> <ul style="list-style-type: none"> * Provide safe, efficient and secure movement of people and goods across the Canadian-U.S. border in the Detroit River area to support the economies of Michigan, Ontario, Canada and the U.S. * Support the mobility needs of national and civil defense to protect the homeland. <p>To address future mobility requirements (i.e., at least 30 years) across the U.S.-Canada border, there is a need to:</p> <ul style="list-style-type: none"> * Provide new border-crossing capacity to meet increased long-term demand; * Improve system connectivity to enhance the seamless flow of people and goods; * Improve operations and processing capability in accommodating the flow of people and goods at the plazas; and, * Provide reasonable and secure border crossing options in the event of incidents, maintenance, congestion, or other disruptions. |

DRIC Comments on DEIS and Responses

| Response Category | Comment | Response |
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| PN Gen | The DRIC DEIS proposes developing a whole new border crossing . . . This seems to be a poor solution to the border capacity problem . . . There is no need for a whole new plaza and new interchange. | <p>A new border crossing is needed in the Detroit-Windsor area to:</p> <ul style="list-style-type: none"> * Provide safe, efficient and secure movement of people and goods across the Canadian-U.S. border in the Detroit River area to support the economies of Michigan, Ontario, Canada and the U.S. * Support the mobility needs of national and civil defense to protect the homeland. <p>To address future mobility requirements (i.e., at least 30 years) across the U.S.-Canada border, there is a need to:</p> <ul style="list-style-type: none"> * Provide new border-crossing capacity to meet increased long-term demand; * Improve system connectivity to enhance the seamless flow of people and goods; * Improve operations and processing capability in accommodating the flow of people and goods at the plazas; and, * Provide reasonable and secure border crossing options in the event of incidents, maintenance, congestion, or other disruptions. |
| PN Gen | The alleged need for improvements to existing plazas and approach roads is not sufficient reason to construct an entirely new crossing. | <p>A new border crossing is needed in the Detroit-Windsor area to:</p> <ul style="list-style-type: none"> * Provide safe, efficient and secure movement of people and goods across the Canadian-U.S. border in the Detroit River area to support the economies of Michigan, Ontario, Canada and the U.S. * Support the mobility needs of national and civil defense to protect the homeland. <p>To address future mobility requirements (i.e., at least 30 years) across the U.S.-Canada border, there is a need to:</p> <ul style="list-style-type: none"> * Provide new border-crossing capacity to meet increased long-term demand; * Improve system connectivity to enhance the seamless flow of people and goods; * Improve operations and processing capability in accommodating the flow of people and goods at the plazas; and, * Provide reasonable and secure border crossing options in the event of incidents, maintenance, congestion, or other disruptions. |
| PN Gen | Federal and State governments in the U.S. are investing hundreds of millions of dollars to improve access to existing crossings. | Comment acknowledged. |
| PN Gen | Declining to conduct an updated traffic forecast and present it to the public for comment would be an arbitrary and capricious decision. . . . Because these outdated traffic forecasts are fundamental to the DEIS's articulated purpose and need, FHWA cannot responsibly proceed with the DRIC project unless they are updated and corrected. | <p>A new border crossing is needed in the Detroit-Windsor area to:</p> <ul style="list-style-type: none"> * Provide safe, efficient and secure movement of people and goods across the Canadian-U.S. border in the Detroit River area to support the economies of Michigan, Ontario, Canada and the U.S. * Support the mobility needs of national and civil defense to protect the homeland. <p>To address future mobility requirements (i.e., at least 30 years) across the U.S.-Canada border, there is a need to:</p> <ul style="list-style-type: none"> * Provide new border-crossing capacity to meet increased long-term demand; * Improve system connectivity to enhance the seamless flow of people and goods; * Improve operations and processing capability in accommodating the flow of people and goods at the plazas; and, * Provide reasonable and secure border crossing options in the event of incidents, maintenance, congestion, or other disruptions. <p>Traffic forecasts relate to capacity. Capacity is one of four listed needs. Redundancy is another. Redundancy requires a new plaza and interchange in the U.S. and a new plaza and access road in Canada.</p> |

DRIC Comments on DEIS and Responses

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| PN Gen | The X-10 or X-11 crossing will pretty much render the Ambassador to a position of second fiddle. Why didn't MDOT think the Gateway Project through to include a vision w/the downriver site? The state could have saved millions if this project decision would have been delayed. | The Gateway Project has independent utility. It was designed to accommodate a replacement span of the Ambassador Bridge but was in no way dependent on a replacement span. It was simply prudent to design for that option. Connections to the interstate system were not allowed by law when I-75 was built. The Gateway Project provides those connections. The need for a new crossing involves redundancy. Both the replacement span of the Ambassador Bridge and a new crossing are needed. So, there would not have been "millions saved." |
| PN Redun | Redundancy is a critical objective of the DRIC Study Project and an essential feature. . . . The current international border crossing system . . . does not work. . . . A breakdown in one lane of traffic, on a local road, or a similar system failure can significantly disrupt the flow of commerce for the entire region. A natural disaster or terrorist attack on such infrastructure would have truly enormously debilitating impact. . . . | Comment acknowledged. |
| PN Redun | Redundancy is a critical objective of the DRIC Study Project and an essential feature. . . . The current international border crossing system . . . does not work. . . . A breakdown in one lane of traffic, on a local road, or a similar system failure can significantly disrupt the flow of commerce for the entire region. A natural disaster or terrorist attack on such infrastructure would have truly enormously debilitating impact. . . . | Comment acknowledged. |
| PN Redun | DIBC and CTC are continuing . . . the Ambassador Bridge Enhancement Project, a new, privately-financed, six-lane span that will be constructed next to the existing Ambassador Bridge, using the same . . . plazas, without taking homes or businesses and without spending taxpayer money. . . . the DRIC project, on the other hand, requires . . . a new bridge . . . new customs plazas . . . and new roads connecting the bridge to U.S. Interstate 75 and Canada Highway 401. | The owners of the Ambassador Bridge were informed via a letter from the Canadian Customs and Border Services Agency dated June 17, 2008, that "the preliminary planning accomplished so far suggests there is insufficient land available to accommodate a functional port of entry (i.e., a plaza) without impact on the community south and west of existing installations." The areas south and west of existing Canadian installations is occupied by institutional, residential and other uses. (Letter available at www.partnershipborderstudy.com .) |
| PN Redun | In today's global knowledge economy and a post 9-11 world, we must be concerned with just-in-time (JIT) business relationships and the unfortunate reality of the major challenge of redundancy - a just-in-case (JIC) backup plan. | Comment acknowledged. |
| PN Redun | Redundancy is a core issue of the DRIC Study Project and an essential feature of a final border improvement project. . . . A breakdown in one lane of traffic on the current span can significantly disrupt the flow of commerce for the entire region. A natural disaster or terrorist attack on such infrastructure would have a truly enormous debilitating impact | Comment acknowledged. |
| PN Redun | . . . redundancy is important But would it not be more difficult to defend and protect two separate structures and plazas. | Security will be addressed by the U.S. Department of Homeland Security and the Michigan Homeland Security. |
| PN Redun | A discussion of Reasonable Alternatives necessarily includes increased public transit capacity (rail and bus) and freight rail infrastructure. | Increased public transit and freight rail infrastructure do not meet the project's purpose and need as they fail to provide physical redundancy for traffic crossing the border. This is fully documented in the Planning/Needs and Feasibility Study. |
| PN Redun | One reasonable alternative to the selected alternatives, insofar as freight traffic is concerned, is intermodal rail. | The DRIC uses in developing its forecasts that 4.4% of the truck traffic could be diverted to intermodal rail by 2030. That diversion is built into the DRIC model before it calculates the 128% increase in truck traffic in 2035. |
| PN Redun | The examples outlined by Mr. Bergmann to modify travel demand: differential tolls, peak period travel disincentives, reversible lanes would have the effect of reducing some current transportation impacts | Comment acknowledged, but these measures would provide no physical redundancy and not satisfy the need for the project. In addition, MDOT lacks the ability to impose these alternatives on its own, and lacks the authority to compel others to impose them. |
| PN Redun | . . . strategic transportation demand management options such as intermodal rail diversion of truck traffic . . . may further lessen environmental impacts as compared to additional road-based crossings. | The DRIC uses in developing its forecasts that 4.4% of the truck traffic could be diverted to intermodal rail by 2030. That diversion is built into the DRIC model before it calculates the 128% increase in truck traffic in 2035. |

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| PN Redun | . . . strategic transportation demand management options such as . . . a light rail public transportation option may further lessen environmental impacts as compared to additional road-based crossings. | Light rail service across the Detroit River would not support the purpose and need of the project to "provide safe, secure, and efficient movement of . . . goods . . . support the mobility needs of national and civil defense . . . and provide for seamless flow of goods and processing capability for goods (emphasis added)." |
| PN Redun | It would be prudent to view current oil supplies as a permanent trend and plan accordingly . . . Enhancing border capacity infrastructure with the exclusive development of an additional road-based crossing would be a myopic use of public funds and environmental capacity. | A new border crossing is needed in the Detroit-Windsor area to: * Provide safe, efficient and secure movement of people and goods across the Canadian-U.S. border in the Detroit River area to support the economies of Michigan, Ontario, Canada and the U.S. * Support the mobility needs of national and civil defense to protect the homeland. To address future mobility requirements (i.e., at least 30 years) across the U.S.-Canada border, there is a need to: * Provide new border-crossing capacity to meet increased long-term demand; * Improve system connectivity to enhance the seamless flow of people and goods; * Improve operations and processing capability in accommodating the flow of people and goods at the plazas; and, * Provide reasonable and secure border crossing options in the event of incidents, maintenance, congestion, or other disruptions. The purpose and need for the project call for redundancy. Nonetheless, MDOT and FHWA are focused on multi-modal solutions to various transportation issues. |
| PN Redun | Unless there is a clear, sustained and substantial reversal in fuel prices, a new highway span simply will not be needed for many years. Current economic conditions indicate that the "Roadrailer" type of equipment, which already is in use between Detroit and Toronto, will become more common due to its high fuel efficiency. MDOT failed to evaluate reasonable intermodal freight alternatives in lieu of building a new span. | The DRIC forecasts assume that 4.4% of the truck traffic could be diverted to intermodal rail by 2030. That diversion is built into the DRIC model before it calculates the 128% increase in truck traffic in 2035. |
| PN Redun | PCEs [passenger car equivalents] . . . can be significantly reduced not only by developing improved trans-border intermodal freight railroad services, but also by improving local trans-border public transportation, but also by improving local trans-border public transportation service and by re-establishing passenger train service from Chicago-Detroit-Buffalo-New York City via Southern Ontario. | Reducing PCEs does not address the need for physical redundancy. |
| PN Redun | The proposed new crossing would not enhance homeland security. . . The DEIS ignores the redundancy already provided by the six existing crossings as well as the replacement span of the Ambassador Bridge . . . a truck ferry, a freight rail tunnel, the Detroit-Windsor Tunnel, and the twin Blue Water Bridges . . . and a freight rail tunnel. In a future emergency, all seven of these crossings could absorb traffic from any crossing that was out of commission . . . providing all the redundancy the region needs. | None of the modes/alternatives mentioned can substitute for the physical redundancy provided to the principal mode serving commerce - trucks. Further, analysis indicates that a new DRIC crossing best responds to the crisis of one of the existing crossings being "out of commission." |
| PN Redun | The DRIC project would not create a "second, distinct crossing system." | The Preferred Alternative would create a new river crossing two miles down river from the Ambassador Bridge. It would provide a new interchange on I-75, plazas in the U.S. and Canada separate from that at the Ambassador Bridge and a new access road to Highway 401 in Canada. |
| PN Redun | Unlike the Ambassador Bridge, which will soon be directly connected to three Interstate Highways, . . . the new crossing described in the DEIS would link only to I-75. | The connections of the two crossings to the U.S. interstate highway system are effectively the same. |

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| PN Redun | The U.S. State department likewise does not agree that the proposed DRIC bridge would create redundancy. In 2005, the State Department opined that locating the DRIC project close to the Ambassador Bridge did not significantly improve redundancy, because "a problem at any one crossing may affect all of the centrally-located crossings. . . . Consequently, proponents of the DRIC project cannot seriously rely on enhanced national security as a justification for the construction of a new border crossing. | The 2005 Letter from the State Department was cautioning against selecting an alternative that was located too close to the existing crossing (like a twinned bridge option) because of the dangers cited in the letter. Additionally, the State Department has reviewed all major products of the DRIC produced since the 2005 letter that lead up to the DEIS. It reviewed and commented on the DEIS. The project's purpose and need and the Preferred Alternative both address national security and redundancy. That position with the U.S. State Department involvement has not changed. |
| PN Redun | The Ambassador Bridge Enhancement Project will create a state-of-the-art bridge far less susceptible to failure. . . . a cable stayed structure . . . | Cable-stay and suspension bridges are both candidates for use in the DRIC. For the DRIC, a decision on bridge type will be made during the design phase. Nonetheless, bridge type does not address the security and redundancy issues. |
| PN Redun | The Detroit Windsor Tunnel has served the region for over 77 years without government support. It remains important that DRIC continue to view the tunnel as an integral part of our regional international transportation system and keep in mind that until a new crossing is open to traffic, the bridge and tunnel share provide the redundancy in our region. | The tunnel and the Bluewater Bridge provide partial redundancy to the Ambassador Bridge. But, the purpose and need for the DRIC finds this partial redundancy inadequate to provide economic security. |
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| PN Redun | A third, state of the art crossing is required for redundancy and safety issues. | Comment acknowledged. |
| Pub Gen | Delray is a neighborhood. If this were just a suburb, or if there was a ward system of city council, then there would be someone representing the people at every meeting. That hasn't been the case While I believe these hearings are required by federal law . . . they don't give people a real input or choice. | Representatives of City Council and Council members attended many DRIC meetings. Members of the State Legislature attended or were represented. The Michigan House of Representatives Subcommittee on Appropriations held seven public hearings. Delray community members testified before the State Legislature of the positive nature of the DRIC communication process. As part of the outreach effort, a field office was maintained in Delray at the Neighborhood House from December 2005 through the end of 2008 to provide easy, regular contact by the community with the project. Monthly meetings of a Local Advisory Council have been held at the same location in the community at the same time each month. Substantial efforts were made to inform the public of all major meetings, including sending thousands of mailers and distribution of flyers door-to-door in the Delray area in English, Spanish and Arabic. At every meeting technical persons are available to answer questions. Question/answer sessions were built into every meeting. Hispanic and Arabic translators were available at every formal public meeting. |
| Pub Gen | As a State Senator and member of the DRIC Local Advisory Council (LAC), I have had the pleasure of observing a public process that has gone above and beyond to encourage the use of public input. . . . In addition to the 40 formal public meetings and workshops held during the DRIC study over the past 36 months, I have attended or been represented at over 30 DRIC LAC meetings which were also open to the public. These meetings were advertised in thousands of direct postal and electronic mailings, broadcast over radio and television, and explained in detail on the DRIC website. Citizens, community leaders, business groups and other interested parties were provided with information in multiple languages and were given ample opportunity to comment. | The comment period was extended 30 days to May 29, 2008. |
| Pub Gen | Significant impacts within the Delray community will result. . . This in 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. | Such dialogue has been ongoing and extensive with the community (see Section 6.2) and will continue as the project moves into design and subsequent phases of work. |
| Pub Gen | When I went to Bowen Branch library today, I did not find the DEIS, nor was the reference librarian able to provide me with one, therefore I believe the comment period should be extended. | Bowen Branch Library was called immediately upon receipt of this comment and indicated all reports were there and available. |

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| Response Category | Comment | Response |
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| Pub Gen | In the future the budgets for major transportation studies should include a line item to provide funding for independent technical review of the DEIS and supporting technical reports for the community. | Comment acknowledged. |
| Pub Gen | We have also received feedback from a number of area residents that it has been very difficult to stay informed on the DRIC process. | If specifics are provided, MDOT will address them. Monthly meetings of a Local Advisory Council have been held at the same location in the community at the same time each month. Substantial efforts were made to inform the public of all major meetings, including distribution of flyers door-to-door in the Delray area. At every meeting technical persons are available to answer questions. Question/answer sessions are built into every meeting. |
| Pub Gen | I looked through the material left at the library. The only problem I found is that a lay person could not understand everything in the books - without a clear understanding it was impossible to conclude what was being conveyed to the public. | The DEIS was written in a "reader friendly" style to make it as understandable as possible. Summaries, brochures and a video were also available to the public to convey the project in easy-to-understand terms. |
| Pub Gen | MDOT and the other parties involved have been informative, cooperative and courteous to those of us attending public meetings and seeking information on this process. However, I am concerned that if this project goes forward, we will be assured of this continuation of community involvement. | The public involvement process continues. |
| Pub Gov | Public ownership of a new international border crossing system is critical to U.S. economic competitiveness, security and redundancy. . . ensuring proper measures, such as strategic priorities, capacity, security, and structural maintenance and integrity on a bi-national scope. | See Section 3.20. The Partnership is committed to providing an end-to-end solution for additional border crossing capacity that will be publicly owned in both countries. Michigan will own the U.S. portion of the bridge, the plaza, and the interchange, with the plaza leased to the federal government. Canada will own the Canadian portion of the bridge and its plaza. The Ontario will own the Canadian access route. Preferred for the bridge is a public-private partnership in the form of a long-term concession agreement which will seek to maximize private sector participation and financing to avoid use of taxpayer dollars by charging reasonable toll. It is envisioned that the owners will form a joint venture to oversee the concession contract with the private sector. The U.S. and Canada are committed to private sector involvement for any combination of the design, financing, construction, operations, and/or maintenance of the bridge crossing. The Partnership will provide oversight of any private sector participation to ensure a safe and secure international border crossing. |
| Pub Gov | . . . the discussion on governance and operations should include an initiative designed to ensure . . . credible security protocols while improving efficiency and reliability. | Security protocols will be determined by the Department of Homeland Security. |
| Pub Meet | Delray residents and community organizations should be afforded the opportunity to participate in a meaningful, transparent process. | Residents and community organizations were and continue to be afforded the opportunity to participate in a meaningful, transparent process. See the many meetings held as noted in Section 6.2 of the FEIS. |
| Pub Meet | MDOT needs to solicit input from parents of Southwestern students, students at the high school, school administration and the Detroit Public Schools for additional mitigation requests to protect the health of students and mitigate other impacts to this facility. | The public involvement process included over 40 meetings at Southwestern High School. Parents and students were among the attendees. The school administration and Detroit Public Schools has been involved in DRIC discussions. |
| Pub Meet | It is imperative that discussion commence immediately with Southwestern High School representatives and the Detroit Public School system regarding impacts, mitigation, and benefits. | The public involvement process included over 40 meetings at Southwestern High School. Parents and students were among the attendees. The school administration and Detroit Public Schools has been involved in DRIC discussions. |
| Pub Notif | While there was outreach conducted for the citizens of Delray - the "area of continued analysis" as defined in the DRIC process - most of the citizens north of I-75 were unaware of the process until it was in full gear. I know that no meeting notices were distributed to my neighbors and others in the larger Southwest Detroit area until early 2007. | Section 6 documents the extensive public outreach program. Approximately 10,000 residences and businesses were sent a mailing about each formal public meeting. In addition, more than a thousand fliers were handed out door-to-door in Delray and along the I-75 service drive north of I-75 for public meetings and workshops. |

DRIC Comments on DEIS and Responses

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| Pub Notif | Meeting notices posted in libraries, newspapers, and other media outlets, and mailings to "about 10,000 interested parties," this is wholly insufficient . . . The Final EIS must detail the rationale for why very minimal if any outreach north of I-75 was conducted by MDOT . . . | Section 6 documents the extensive public outreach program. Approximately 10,000 residences and businesses were sent a mailing about each formal public meeting. In addition, more than a thousand fliers were handed out door-to-door in Delray and along the I-75 service drive north of I-75 for public meetings and workshops. |
| Time | It is our position that the failings of the DRIC environmental study are significant, and we ask for an extension of the public comment period so that we might give them the full attention they deserve . . . Your agencies should grant a 120-day extension of the time for public comment, thereby allowing everyone in the affected community sufficient time to thoroughly review the 6,000-plus page DEIS. . . . It is our view that your agencies must revisit, revise and re-circulate for comment their Draft Environmental Justice analysis. | Given the initial interest in a longer comment period, FHWA approved a 30-day extension to May 29. In light of the extensive public outreach prior to the release of the DEIS on February 29, the two public hearings conducted after the release of the DEIS and the comments received prior to the granting of the extension, the 30-day extension gave all interests ample time to review and comment on the DEIS. Since the publication of the DEIS, a preferred alternative was identified. The next step was to determine if it would have a disproportionately high and adverse effect on minority and low-income population groups in the study area. Based on updated census information and field reviews, it was determined that the preferred alternative will have a disproportionately high and adverse effect on minority and low-income population groups in the study area (Section 3.1.5). MDOT has been working with the community in developing mitigation measures that would avoid, minimize or mitigate these impacts. MDOT and the community have also identified community enhancements, which are listed in the "Green Sheet" at the end of Section 4 in the FEIS. |
| Time | We strongly urge for the DEIS to withdraw . . . and take into serious consideration the voice and issues expressed by this community. | Section 6.2 documents the extensive outreach to and involvement of the Delray community. Many members of the Delray community have spoken at numerous DRIC meetings. |
| Time | The Draft Environmental Impact Statement has been issued. While it may contain valuable information, it is written in somewhat technical terms. Delray is a valuable sector of Southwest Detroit, with a wealth of history and committed multi-cultural Detroiters. We ask that you slow down and work together with us to get a more concise explanation of the DEIS in small groups that may be less intimidating. | The comment period was extended 30 days to May 29, 2008. A public meeting was held on May 21, 2008, at Holy Redeemer Church to present the DEIS contents and answer questions. The presentation and comments of every speaker were translated into Spanish. Materials distributed were in Spanish. |
| Time | As the author of the National Environmental Policy Act (NEPA), it is critically important that members of the community have ample opportunity to comment, however, it is equally important that an extension is not used simply as a tactic to delay the process. . . . Given that the comment period of the DEIS ends this week [April 29] . . . How many public comments has the U.S. Department of Transportation (DOT) received in response to the DEIS? . . . [and] In your opinion, has the 60 day comment period been sufficient to meet the needs of the people? If so, please explain why. If not, please explain why not. | On the order of 700 comments were received. The comments received during the 30-day extension of the comment period were not different in content and substance from those received during the initial comment period which ended on April 29, 2008. |
| Transla | 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. | Measures taken to accommodate Spanish and Arabic persons included: availability at the public hearing of brochures in Arabic and Spanish and a full 47-page DEIS Summary in Spanish; Spanish subtitles to the introductory video viewed upon entering the public hearing hall; comment forms in Arabic and Spanish; real estate information related to relocation in Spanish; Arabic and Spanish translators who announced their availability and readiness to help with questions at the hearings; simultaneous translations of speakers and their comments at the public hearing; the siting of one of the two public hearings at LaSed, a traditional gathering place for Hispanics; advertisement of the hearing in the Latino Press and Arab American News; and, availability of the Spanish translation of the Summary on the project web site. Translators have been available at the many meetings noted in Section 6.2. |

DRIC Comments on DEIS and Responses

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| Transla | We respectfully ask that the agencies provide the community and businesses with, at the very least, substantive summaries of the community impact portions of the DEIS translated into the different language that make up that area of Southwest Detroit and vie them sufficient time to review and comment on the information. | The DEIS brochure is in Spanish and Arabic. The Summary of the DEIS is in Spanish. |
| M House | [A CBA should] build new homes . . . Which will replace housing . . . planned in a pleasing and comprehensive manner [and] offered first to relocated residents. | MDOT and FHWA will not build new houses. They will provide compensation for relocation. If the private and/or public sector were to build housing in Delray to accommodate the relocatees, then new housing could be available. |

