



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

Michigan Division

315 W. Allegan, Room 201
Lansing, Michigan 48933

September 4, 2008

The Honorable Alan L. Cropsey
United States Senator
S-8 Capitol Building
P.O. Box 30036
Lansing, MI 48909-7536

Dear Senator Cropsey:

At the August 15, 2008, Senate Appropriations Subcommittee on Transportation and the Detroit International River Crossing (DRIC), you requested me to furnish the following two items:

1. The Detroit International Bridge Company plans for the existing span when the enhancement span is built. I commented that it was difficult to determine, since the Bridge Company had indicated different things in two documents. You asked me to provide examples.
2. Evidence that I had the authority to take actions on the DRIC project and study.

Attached to this letter are two pages (Exhibit 1) from the Detroit International Bridge Company Environmental Assessment filed with the U.S. Coast Guard. On page 7 they state, "*Once the new structure is completed, the existing Ambassador Bridge will be taken out of service to effect repairs that are deemed necessary. Once any necessary repairs are completed, the existing structure will be used to provide for bridge internal operational needs and also to provide pedestrian and bicyclist amenities*". On page 16 it further states that, "*The intent is to maintain the capacity of the current crossing and to improve the efficiency of the crossing by providing dedicated lanes restricted to low risk truck travels.*" Finally, in the next paragraph it states, "*Unlike the purpose of the Ambassador Bridge Enhancement Project, the purpose of the DRIC study is to investigate alternatives for additional capacity needs in the future.*"

Exhibit 2 is from the Detroit International Bridge Company application to the U.S. DOT in response to the call for proposals for the new Transportation Border Congestion Relief Program. On page 1 they state, "*...The Detroit International Bridge Company (DIBC) respectfully submits this Application to propose that the construction and operation of a new, six-lane replacement span of the Ambassador Bridge (the New Span) be selected...The New Span—including the addition of physical capacity and a myriad of innovative operational, security, and technological improvements detailed herein—promises not only to reduce transportation congestion in the short term...but also to build the foundation for successful, longer-term congestion reduction efforts by providing a total of 10 lanes of physical capacity for future traffic at the largest, busiest border crossing in North America.*"

**MOVING THE
AMERICAN
ECONOMY**

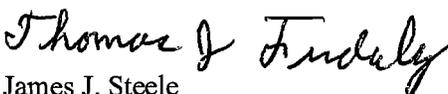


Where do the other four lanes come from? Presumably, they are the existing four lanes of the present bridge. The discussion further on talks about making repairs to the existing bridge after the new one is built. These two documents do not present the same scenario for the existing bridge.

The last item was evidence of the authority delegated to the Michigan Division Administrator to take actions in the DRIC study. Exhibit 3 is taken from the FHWA Delegation and Organizational Manual. I have copied several pages to illustrate that the Division Administrator has been delegated all functions that pertain to operating a Federal Highway Program in the respective States. For instance, under environment (page 12), you will see the Division Administrator has the authority to approve draft EIS and to approve Final EIS, as well as Record of Decisions. In the project arena (page 13), he has the authority to authorize States to proceed with preliminary engineering or right-of-way acquisition in accordance with program approvals and other project activities. He is also authorized to act on behalf of the FHWA Administrator in complying with the environmental procedures in the regulations of other Federal agencies (page 12).

I trust this fulfills my commitment to furnish the requested information. If you have any questions, please contact me at 517-377-1844.

Sincerely,

for 
James J. Steele
Division Administrator

Attachments:

Exhibit 1, EA for Coast Guard Permit, pages 7 and 16

Exhibit 2, DIBC Application for U.S. DOT Congestion Relief Program, page 1

Exhibit 3, FHWA Delegations and Organizational Manual, Chapter 5, pages 10, 11, 12, 13, and 14

cc: Senator Randy Richardville, w/attach.
Senator Buzz Thomas, w/attach.
Kirk Steudle, Director, MDOT (B450), w/attach.
Ron DeCook, Director of Governmental Affairs (B450), w/attach.
Mohammed Alghurabi, Transportation Engineer (B220), w/attach.
Ted Burch, FHWA-Michigan, w/attach.
Ryan Rizzo, FHWA-Michigan, w/attach.

Profile No. S-98665

customs and tolls facilities and then exit onto Huron Church Road. The secondary customs facility and duty free shops are found in a separate facility to the southeast. Trucks exiting the Ambassador Bridge also enter primary customs and tolls, exit onto Huron Church Road, and proceed to the secondary customs facility. From the secondary customs facility, the trucks have access to Highway 401 via Huron Church Road. There is local access to the bridge from Wyandotte Street and Huron Church Road.

1.3 Proposed Enhancements

The DIBC/CTC have determined that the enhancement of the existing Ambassador Bridge crossing is feasible and desirable. The enhancement would include a new six lane cable stayed bridge located in the same corridor and adjacent to the existing Ambassador Bridge, consistent with the approved and ongoing Ambassador Bridge Gateway Project. This bridge would tie directly into the existing plazas in both Canada and the United States without the need for modification to their currently approved and permitted configuration. The proposed bridge would run roughly parallel to the existing Ambassador Bridge. The width of the proposed bridge is set to allow transition directly into the connection points in both the United States and Canadian plazas and to provide the necessary safety shoulders that are not present on the existing structure.

The proposed bridge consists of 6 lanes of traffic with three in each direction. The outside lane's primary use would be as dedicated FAST truck exit ramps to the tolls and primary and secondary customs facilities in the United States and Canada. The inside lane's primary use would be for automobiles to the tolls and primary customs with flexibility preserved for all types of vehicular operations. The use of the center lane would depend on the traffic needs of the moment and could be for both trucks and cars or trucks only depending on the traffic mix at any given time. Once the new structure is completed, the existing Ambassador Bridge will be taken out of service to effect repairs that are deemed necessary. Once any necessary repairs are completed, the existing structure will be used to provide for bridge internal operational needs and also to provide pedestrian and bicyclist amenities. In addition, the old span will be available in the event of some exigency impairing the use of the new span to ensure the free flow of traffic between Windsor and Detroit. See Appendix C for detailed drawings and descriptions.

All existing roads and streets in both the United States and Canada would remain open and will continue to function as they currently operate. The Proposed Project does not entail any changes to these roads.

1.4 Complementary Enhancements

1.4.1 Gateway - MDOT and DIBC/CTC

As part of the Ambassador Bridge Gateway Project, the Michigan Department of Transportation (MDOT) has completed design plans for the reconstruction of the entire Ambassador Bridge Interchange to provide direct access between the bridge and I-75 and I-96. The Ambassador Bridge Gateway Project has been approved by the USDOT, Federal Highway Administration and

Ambassador Bridge where traffic is impeded, there is no another bridge within the immediate region to route the traffic. This redundancy would ensure that this vital border crossing be functional even if a major problem were created on a new structure.

Given the importance of this crossing to the people and businesses of both countries, the inability of the existing structure to accommodate the FAST trucks, the fact that the existing structure cannot be counted on to indefinitely carry heavy commercial traffic without significant costly upgrades, and the decreased level of functionality due to narrow lanes with substandard shoulders, the No-Build Alternative did not rank high among the array of alternatives studied and did not meet the needs of this project. Therefore, this alternative was not considered further in the alternatives analysis.

2.3 Corridors under Consideration

The purpose of the Ambassador Bridge Enhancement Project is to remove traffic from an aging structure without interrupting service between the United States and Canada. The intent is to maintain the capacity of the current crossing and to improve the efficiency of the crossing by providing dedicated lanes restricted to low risk truck travelers.

A capacity expansion study is underway in the region in which numerous alternative corridors are currently being investigated under the auspices of the bi-national Detroit River International Crossing Study or DRIC study. Unlike the purpose of the Ambassador Bridge Enhancement Project, the purpose of the DRIC study is to investigate alternatives for additional capacity needs in the future. All of the alternatives under investigation by the DRIC study carry construction costs likely to be substantially greater than the cost of using the existing corridor described below. In addition, community impacts would be much greater as a result of the substantial business and residential relocations likely to be required as a result of the introduction of a large plaza and river crossing into entirely new neighborhoods in both Canada and the United States. Substantially more environmental impacts are also likely to occur with construction of a bridge in a new corridor as compared to the existing alignment. Since little vacant, unpopulated areas exist in the region on both sides of the border, construction of an entirely new facility on an entirely new corridor simply to replace the existing lanes would be extremely costly and would disrupt communities that do not currently experience bridge traffic. For the least intrusive alternative corridor under investigation by the DRIC study, several hundred homes, churches and business would be demolished with many more experiencing line exposure to much higher than existing noise levels along with a reduction in air quality.

The Ambassador Bridge Enhancement Project simply modifies the existing crossing by replacing the lanes of an aging bridge structure that connect to existing plazas in the U.S. and Canada. As such, other alternative corridors are not being considered as they are beyond the scope of this project and would not meet the purpose and need and they would have substantial human and environmental impacts.

INTRODUCTION

On May 30, 2008, the U.S. Department of Transportation ("DOT") issued a notice requesting submission of applications for its new Transportation Border Congestion Relief Program ("TBCR"). See 73 Fed. Reg. 31183. DOT's notice outlined the important role of the Federal Government in facilitating and accelerating transportation-related capacity and operational improvements at international land border crossings. The goal of the TBCR program is to "implement[] innovative solutions to help address land border travel time delay and facilitate trade and travel without compromising the vital mission of securing America's borders." According to the notice, DOT intends to select two or more surface transportation projects to participate in the TBCR program, a minimum of one on the U.S. border with Mexico and one on the U.S. border with Canada.

In response to DOT's request, the Detroit International Bridge Company ("DIBC") respectfully submits this Application to propose that the construction and operation of a new, six-lane replacement span of the Ambassador Bridge (the "New Span") be selected as a participant in the TBCR program on the U.S./Canada border.¹ The New Span—including the addition of physical capacity and a myriad of innovative operational, security and technological improvements detailed herein—promises not only to reduce transportation congestion in the short-term (with delivery of the project in 18-24 months), but also to build the foundation for successful, longer-term congestion reduction efforts by providing a total of 10 lanes of physical capacity for future traffic at the largest, busiest border crossing in North America.

Before turning to the details of the Application with regard to the New Span, DIBC will provide a brief description of the history and operating conditions at the current, 80-year-old span of the Ambassador Bridge, and will explain why the New Span meets the objectives of the TBCR program as they are set forth in the May 30 Federal Register notice.

What is the history of the Ambassador Bridge's Current Span?

The existing, four-lane span of the Ambassador Bridge between Detroit, Michigan and Windsor, Ontario (the "Current Span") is the route for approximately 26% of all trade between the United States and Canada. Its construction was originally authorized by reciprocal legislation enacted by the United States Congress and Canadian Parliament in 1921. See Exhibits 1 & 2. In 1927, the International Joint Commission confirmed that this reciprocal legislation created a special international agreement and treaty under the

¹ DIBC operates the Ambassador Bridge, which spans the Detroit River from Detroit, Michigan to Windsor, Ontario. DIBC owns the American half of the Bridge and owns 100% of the stock of the Canadian Transit Company ("CTC") that in turn owns the Canadian half of the Ambassador Bridge.

Exhibit 3

prior approval to more than one move of a displaced person where such approval is shown to be in the public interest.

- i. **Moving Expense Schedule.** Division Administrators are delegated the authority to approve States' moving expense schedules and revisions thereto. Division Administrators shall coordinate with the Division Administrators of adjoining states for purposes of consistency. A copy of the approved schedule should be furnished to the Washington Headquarters for review and national publication for use throughout the Federal Government.
- j. **Methods for Determining the Probable Selling Price of Comparable Dwellings.** Division Administrators are delegated the authority to approve or disapprove a method different from the three comparable or locality-wide study methods of determining the probable price of comparable dwellings.
- k. **Publication of Relocation Brochure and Public Notice of Relocation in Areas Where a Language Other than English is Predominant.** Division Administrators are delegated the authority to waive the requirement for publication in a foreign language of a relocation brochure and public notice of relocation in areas where language other than English is predominant, if it is found unnecessary, and an alternate program is established for the displaced person unable to communicate in English.
- l. **Actual Reasonable Expenses in Searching for a Replacement Business.** Division Administrators are delegated the authority to waive the \$1,000 limitation on reimbursement for actual reasonable expenses in searching for a replacement business, in exceptional cases, where circumstances so require.
- m. **Payment Determination for 2-Taxable Years Immediately Preceding the Taxable Year in Which a Business is Relocated.** Division Administrators are delegated the authority to give prior approval to the State in cases where the 2-taxable years immediately preceding a business displacement are not representative, to use a 2-year period beginning with 2 years prior to negotiations for the project if that would be more representative.
- n. **Actual and Reasonable Expenses in Searching for a Sign Site.** Division Administrators are delegated the authority to give prior approval to waive, in exceptional cases, the \$100 limitation on reimbursement to the owner of a displaced advertising sign for his/her actual, reasonable expenses in searching for a replacement sign site, provided it does not exceed \$500.
- o. **Preliminary Study and/or Last Resort Housing Plan**
 - (1) Division Administrators are delegated the authority, either at the time of program approval or subsequently, to issue a letter of authorization to the State to proceed with a study and/or plan.
 - (2) Division Administrators are delegated the authority to approve the last resort housing plan.
 - (3) Division Administrators are delegated the authority to authorize the State to implement the plan.

17. ENVIRONMENT

- a. **Public Involvement/Public Hearing Procedures.** Division Administrators are delegated the authority to approve public involvement/public hearing procedures and changes thereto in accordance with 23 CFR 771.111(h).
- b. **Environmental Approvals Pursuant to the National Environmental Policy Act**
 - (1) Division Administrators are delegated the authority to determine whether an action qualifies as a categorical exclusion pursuant to 23 CFR 771.117.
 - (2) Division Administrators are delegated the authority to approve environmental assessments for agency and public availability and to make findings of no significant impact.

(3) Division Administrators are delegated the authority to prepare and issue notices of intent as required by the regulations of the Council on Environmental Quality (40 CFR 1501.7, 1508.22).

→ (4) Division Administrators are delegated the authority to determine whether an environmental impact statement (EIS) or supplemental EIS should be prepared.

→ (5) Division Administrators are delegated the authority to approve draft EISs for circulation to the public and to other agencies.

→ (6) Division Administrators are delegated the authority to approve final EISs and related actions, and to adopt final EISs prepared by other agencies. **A legal sufficiency review will be provided by Counsel prior to the approval of EISs.** For projects which are highly controversial or involve issues of national significance, Washington Headquarters concurrence will be requested prior to approval.

(7) Division Administrators are delegated the authority to execute the record of decision.

(8) Division Administrators are delegated the authority to conduct reevaluations and make determinations based on reevaluations pursuant to 23 CFR 771.129.

(9) The Associate Administrator for Planning, Environment, and Realty is delegated the authority to make National Environmental Policy Act and other environmental approvals of a nationwide or programmatic nature. This authority may be redelegated.

(10) The Associate Administrator for Planning, Environment, and Realty is delegated the authority to request that Division Administrators obtain prior concurrence by Washington Headquarters on final environmental impact statements, Section 4(f) statements, and related actions for projects which are highly controversial or involve issues of national significance. This authority may be redelegated within the Office of Planning, Environment, and Realty.

c. Procedures for Abatement of Highway Traffic Noise and Construction Noise (FAPG 23 CFR 772)

(1) Division Administrators are delegated the authority to determine whether project plans and specifications incorporate reasonable and feasible noise abatement measures (FAPG 23 CFR 772).

(2) Division Administrators are delegated the authority to approve Federal funding of noise abatement measures listed in FAPG 23 CFR 772.13(c).

(3) Division Administrators are delegated the authority to approve proposals for noise abatement measures other than those listed in FAPG 23 CFR 772.13(c) when the abatement measures listed are physically infeasible or economically unreasonable (FAPG 23 CFR 772.13(d)).

d. Air Quality Conformity and Priority Procedures for use in Federal-Aid Highway and Federally Funded Transit Programs. Division Administrators are delegated the authority to determine that transportation plans, programs, and projects are in conformance with approved State air quality implementation plans in accordance with Sec. 110 of the Clean Air Act Amendment (42 U.S.C. 7410(a) (2) and rules promulgated by the Environmental Protection Agency in consultation with the Department of Transportation under 40 CFR Parts 51 and 93 (Part II) and 40 CFR 51 Part III.

e. Section 4(f) Approvals

(1) Division Administrators are delegated the authority to determine the applicability of Section 4 (f) of the Department of Transportation Act, pursuant to 23 CFR 771.135.

(2) Division Administrators are delegated the authority to make Section 4(f) determinations pursuant to 23 CFR 771.135(a) and approve Section 4(f) statements pursuant to 23 CFR 771.135(l), **subject to a legal sufficiency review by Counsel.** This authority shall be

redelegated to Division Administrators. The legal sufficiency review will be provided by Counsel prior to approval of the Section 4(f) statement. For projects which are highly controversial or involve issues of national significance, Washington Headquarters concurrence will be requested prior to approval.

(3) The Associate Administrator for Planning, Environment, and Realty is delegated the authority to promulgate and approve nationwide programmatic Section 4(f) evaluations. This authority may be redelegated.

(4) Division Administrators are delegated the authority to promulgate and approve programmatic Section 4(f) evaluations with the prior concurrence of the Washington Headquarters.

(5) Division Administrators are delegated the authority to determine that a programmatic Section 4(f) approval applies to a project.

→ f. **Representation of FHWA.** Division Administrators are delegated the authority to act on behalf of the Federal Highway Administrator in complying with the environmental procedures in the regulations of other Federal agencies. The authority to serve as the FHWA "Agency Official" in carrying out the provisions of 36 CFR, Part 800, "Protection of Historic Properties," may be redelegated by Division Administrators.

g. **Environmental Mitigation**

(1) Division Administrators are delegated the authority to determine whether environmental mitigation measures are eligible for Federal funding pursuant to 23 CFR 771.105(d).

(2) Division Administrators are delegated the authority to approve wetland mitigation measures outside the highway right-of-way pursuant to 23 CFR 777.9(b).

h. **Other Environmental Findings.** Division Administrators are delegated the authority to make findings for wetlands, flood plains and other environmental considerations as required by statute, regulation, or executive order and which are not otherwise incorporated into the approval made pursuant to the National Environmental Policy Act.

i. **Federal Lands Highway Program.** See Part I, Chapter 6, for equivalent environmental delegations for the Federal Lands Highway Program.

18. **PRIVATELY OPERATED INFORMATION CENTERS.** Division Administrators are delegated the authority to approve leases or agreements permitting privately operated information centers at safety rest areas (FAPG 23 CFR 752, Landscape and Roadside Development).

19. **RIGHT-OF-WAY ENCROACHMENTS.** Division Administrators are delegated the authority to determine that right-of-way encroachments on projects, other than projects on the Interstate System, must be removed, or approve conditions under which they may be permitted to remain (23 CFR 1.23).

SECTION 3. ENGINEERING AND OPERATIONS

20. AUTHORIZATIONS TO PROCEED

→ a. Division Administrators are delegated the authority to approve PS&E and authorize advertising or commencement of force account work for Federal-aid projects within the limits of amounts released for obligation, where applicable, and to approve the State's comprehensive Highway Safety Improvement Program (HSIP) if the HSIP conforms with FAPG 23 CFR 924J (Highway Safety Improvement Program). If a State has an approved comprehensive HSIP, the Division Administrator does not have to review high priority projects selected from the State's listing of hazardous locations in the HSIP.

b. Division Administrators are delegated the authority to approve engineering and operational **acceptability** of changes in points of ingress and egress with Interstate through traffic lanes and with

interchange ramps on completed sections of the Interstate System for the following types of projects: new interchanges outside of transportation management areas (except new freeway-to-freeway interchanges and new partial interchanges); modification of existing interchanges (except major modification of freeway-to-freeway interchanges); completion of partial interchanges; locked gate access; and closing of individual access points or entire interchanges. Transportation management areas are defined in 23 U.S.C. 134(i) and, for purposes of this delegation of authority, include only the urbanized portion as determined by the Bureau of Census. The authority to approve engineering and operational **acceptability** for other types of projects is reserved to the Federal Highway Administrator (Chapter 3, paragraph 15j).

- c. The Alaska Division Administrator is delegated the authority to approve, for any segment of the Interstate System in Alaska, changes in the degree of access control from that shown in the approved PS&E.
- d. Division Administrators are delegated the authority to authorize States to proceed with preliminary engineering or right-of-way acquisition in accordance with program approvals and within the limits of amounts released for obligation, where applicable.
- e. Division Administrators are delegated the authority to approve standard plans.
- f. Division Administrators are delegated the authority to approve (1) standard specifications, (2) supplemental specifications, (3) specifications in the developmental stage, and (4) special provisions which are proposed for use on Federal-aid projects.
- g. Division Administrators are delegated the authority to approve the use of State-furnished materials on Federal-aid projects.
- h. Division Administrators are delegated the authority to approve, for an individual project, exceptions to the minimum design standards for non-Interstate Federal-aid projects in all States except Alaska and for Federal-aid projects, including Interstate projects, in Alaska (Approvals of exceptions for Interstate projects are covered in paragraph 20i of this section.).
- i. Division Administrators are delegated the authority to approve, for individual projects on the Interstate System, exceptions to design standards adopted for the Interstate System.
- j. Division Administrators are delegated the authority to approve preliminary plans for major bridges or other structures, subject to the provisions of FAPG G 6012.01 (Preliminary Plan Review and Approval).
- k. Division Administrators are delegated the authority to approve individual design standards, policies, and guides for the Hazard Elimination Program and Rail-Highway Grade Crossing Program (23 CFR 922).
- l. Division Administrators are delegated the authority to make findings that highway encroachments on a flood plain are the only practicable alternative location, as outlined in FAPG 23 CFR 650A (Location and Hydraulic Design of Encroachments on Flood Plains).
- m. Division Administrators are delegated the authority to approve the criteria and/or procedures for the geometric design of nonfreeway resurfacing, restoration and rehabilitation projects as proposed by the State in conformance with FAPG 23 CFR 625 (Design Standards for Highways).
- n. Division Administrators are delegated the authority to approve requests for a waiver of the "Buy America" requirements when such a request is submitted by a State highway agency (FAPG 23 CFR 635D, General Material Requirements), subject to the prior concurrence of the Office of Infrastructure, Washington Headquarters.
- o. Division Administrators are delegated the authority to approve traffic surveillance and control system projects.

21. CONTRACT AND FORCE ACCOUNT APPROVALS

- a. Division Administrators are delegated the authority to concur in the award of contracts or the rejection of all bids for Federal-aid projects, subject to the provisions and limitations of FAPG 23 CFR 635A (Contract Procedures).
- b. Division Administrators are delegated the authority to make findings that construction of a Federal-aid project by the force account method is cost effective, as outlined in FAPG 23 CFR 635B (Contract and Force Account (Justification Required for Force Account Work)).
- c. Division Administrators are delegated the authority to approve change orders and extra work orders on Federal-aid projects and is subject to the provisions of FAPG 23 CFR 635A (Contract Procedures).
- d. Division Administrators are delegated the authority to approve arrangements by a State for construction under supervision of a local highway agency when the conditions set forth in FAPG 23 CFR 635A (Contract Procedures) are met.

22. AGREEMENT APPROVALS

- a. Division Administrators are delegated the authority to execute project agreements and modifications thereof for Federal-aid projects.
- b. Division Administrators are delegated the authority to approve agreements entered into between State highway agencies and railroad or utility companies for Federal-aid projects.
- c. Division Administrators are delegated the authority to approve, in accordance with FAPG 23 CFR 172 (Administration of Negotiated Contracts), (1) agreements between highway agencies and consultants for engineering services on Federal-aid projects, and (2) consultant procurement procedures of highway agencies.
- d. Division Administrators are delegated the authority to approve (1) the alternate procedure for processing State-utility agreements in accordance with FAPG 23 CFR 645A (Utility Relocations, Adjustments, and Reimbursement) and (2) the alternate procedure for processing State-railroad agreements in accordance with FAPG 23 CFR 646B (Railroad-Highway Projects).
- e. Division Administrators are delegated the authority to execute clause B agreements with State highway agencies electing to use the "sliding scale rates," as provided for in 23 U.S.C. 120(a).

23. ACCOMMODATION OF UTILITIES

- a. Division Administrators are delegated the authority to approve a State's statement and policy, and any subsequent changes or modifications thereto, for accommodating utilities and private line crossings on the right-of-way of Federal-aid and Federal lands highway projects under FAPG 23 CFR 645B (Accommodation of Utilities).
- b. Division Administrators are delegated the authority to approve requests for which the proposed installation is not in accordance with 23 CFR or the State highway agency's utility accommodation policy approved by the FHWA (23 CFR 645.215(d)(1)).
- c. Division Administrators are delegated the authority to approve requests for longitudinal installations of private lines (23 CFR 645.215(d)(2)).

24. FINAL PROJECT APPROVALS

- a. Division Administrators are delegated the authority to accept for the FHWA completed Federal-aid projects.