Michigan Association of Railroad Passengers, Inc.
P.O. Box 594
St. Clair Shores, MI 48080

May 29, 2008

Robert Parsons, Public Involvement/Hearing Officer
Michigan Department of Transportation
P.O. Box 30050
Lansing, MI 48909
Email: ParsonsB@michigan.gov

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

Dear Mr. Parsons:

As MARP reported in our earlier statement, we agree fully with the findings of Dr. Dietrich R. Bergmann., Ph.D., P.E. The extension of the comment period has allowed us to further examine the DRIC DEIS.

Our comments are divided into two parts, Part I and Part II, and are presented below and on the seven pages that follow.

We appreciate having the opportunity to comment on the DRIC DEIS.

Sincerely,

John D. DeLora

John D. DeLora, President

[redacted]

PART I

Abbreviations used herein:

CI- U.S. Customs and Immigration
CCI- Canadian Customs and Immigration
DRIC- Detroit River International Crossing project
MI-DOT- Michigan Department of Transportation
MARP- Michigan Association of Railroad Passengers
MPF- Michigan Passenger Foundation
OMT- Ontario Ministry of Transport
US-DOT- US Depart of Transportation

The issues MARP examined further include:

1. NEED. As Dr. Bergmann shows on p. 10 of his initial statement (Dietrich R. Bergmann, April 29, 2008 letter to Robert Parsons), by using more recent and complete data than that provided by MI-DOT in the main volume of the DRIC DEIS, he found that the projected 2034 demand is only 90% of current capacity. 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.

2. 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 that the full cost of the project is $5 billion Canadian. Also, MARP is concerned that MI-DOT has failed to systematically evaluate the financial and environmental risks for the project.

3. CONGESTION. Congestion issues are mentioned as a reason for this project, but MI-DOT makes the false assumption that added lane capacity will improve fluidity. Since the original comment deadline, MARP members have gone to the area of the Fort Street CI plaza and observed traffic flows. Backups on the Ambassador Bridge appear to be entirely due to how many truck CI 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. When four truck CI posts are open, there are modest backups, and when five or more posts are open, traffic moves freely. The solution to reducing truck congestion is to ensure that more truck CI posts are open at all times.

4. CONGESTION PRICING. Traffic flow can be made more fluid by introducing congestion pricing. Frequent user passes should have their charges vary according to traffic volumes. Peak hour crossings should pay a higher fare, off-peak crossings should pay a lesser fare, and low-volume time users should get a substantial discount. This concept should apply to both automobile traffic and truck traffic.

5. ENCOURAGE ALTERNATE CROSSING MODES. PCE's (a term whose definition is stated in the note accompanying Figure S-2 on page ES-2 of the DRIC DEIS) can be significantly reduced not only by developing improved trans-border intermodal freight railroad services, 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.

The Penn Central Railroad operated two round trips daily right up until the formation of Amtrak on May 1, 1971. The route was not included by the US-DOT in Amtrak's initial service network for two reasons: (1) They felt that passengers on that route would switch to the Lakeshore Limited route via Cleveland (they didn't), and (2) the Lakeshore Limited route through Cleveland was favored because the states along the route indicated they would make up any losses, which they failed to do. As a result the Lakeshore Limited service was discontinued.

Public outcry against the termination caused Congress to reinstate the Lakeshore Limited service, with Amtrak absorbing all losses.

In 1978 Congress and the Carter Administration asked US-DOT to recommend a restructured and reduced Amtrak route system. US-DOT Secretary Brock Adams reported the results in January 1979 in the "US-DOT Final Report to Congress on the Amtrak Route System", http://www.fra.dot.gov/downloads/Research/amtrakroute.pdf

Beginning on p. 4-12, the January 1979 report stated...

"(1) East-Coast to Chicago Service. The Preliminary Report continued the current Amtrak East Coast-to-Chicago service pattern, with one New York-Chicago train operating via Buffalo and Cleveland and the second operating via Philadelphia and Pittsburgh. Further examination of the possible routings for these services indicated that the route that yields the largest number of passenger-miles per train-mile runs from New York through Buffalo and Detroit to Chicago. This route will generate an estimated 228 passenger-miles per train-mile , compared to an estimated 163 via Buffalo and Cleveland and an estimated 204 via Philadelphia and Pittsburgh. In addition, based upon track improvement programs currently being undertaken by the States of New York and Michigan, it shows the greatest prospect for future improvements in running time. To avoid delays caused by Customs formalities, the train should operate on a "closed door" basis through Canada. The route will provide improved overnight service between New York and Detroit and new direct service between Boston and Detroit. For all of these reasons, the Department recommends the route via Buffalo and Detroit as the premier New York-Chicago route."

US DOT's conclusions were validated by the results of a June 1980 MPF survey of 1,947 passengers on the Detroit-Chicago Amtrak route. One question in that survey asked passengers which new route they would use most. The highest response was 36.7% for Detroit-New York, followed by 17.4% ,for Detroit-Florida, 15.8% Detroit-Toronto, 3.6% Detroit-St. Louis, and the remainder were no answer or "other." The results were reported in the December, 1980 issue of the MARP newsletter.

Finally, increased rail passenger service is far friendlier to the environment than increased auto travel. See Part II of these comments for more details on this issue.

There is no reason to believe that high speed rail service from the west to Detroit and then across southern Ontario to Buffalo and points east would not be a popular routing for passenger rail traffic in 2008, just as it was in 1979.

CONCLUSION:

Regrettably, MI-DOT has included in the DEIS a substantive evaluation of **not even one** reasonable non-highway alternative to its proposed new trans-border highway. Accordingly, the DEIS is incomplete and needs to be redone.

PART II

THE PUBLIC BENEFITS OF PASSENGER TRAINS

By Kay Chase, Michigan Association of Railroad Passengers

The transportation system in the U.S. is facing daunting challenges which demand new solutions – solutions that include greater reliance on rail to move both people and goods.

The challenges include increasing highway congestion, cancellations and delays at airports, rising fuel costs, greenhouse gas emissions, and, particularly in Michigan, an aging population and inadequate financial resources for highway maintenance and construction. All of these are making travel more time consuming, costly, polluting, and dangerous.

In the period 1990-2001, vehicle travel on Michigan interstate highways increased 33%, while lane miles increased only 3% (TRIP, page 3). Highway traffic is expected to increase another 40% by 2026 if no new capacity is added. This will result in congested conditions on two-thirds of the state's urban interstates and one-third of the rural interstates (TRIP, page 5).

Michigan faces two additional challenges: (1) an aging population, and (2) severe financial constraints that are hampering maintenance of the existing system, let alone allowing for future road expansion.

A report prepared in 2006 for the Michigan Department of Transportation states "The dominant socioeconomic change in Michigan is expected to be the increase in aging and retired populations." (SocioecTR, page 30)

Consequently, MDOT predicts a tripling of highway fatalities among persons 65 or older in the next 25 years if present trends continue. (SafetyTR, page 20)

On the subject of safety, it is worth noting that "There has not been a single passenger death, other than from natural causes, on a Michigan train since Amtrak's inception." (personal communication, John DeLora, Executive Director of the Michigan Association of Railroad Passengers).

It is not unreasonable to assume that commuter and passenger trains will assume a greater role in Michigan's future transportation system. The state of Michigan, along with other states throughout the Midwest, appears ready to place greater reliance on off-highway solutions to meet future transportation needs.

The recently completed Michigan State Long Range Transportation Plan (MichSLRP) foresees a revenue gap that will hamper both maintenance and repair of existing roads and bridges and the ability to add new capacity to the system. With nearly 60% of the state's interstate highways in

fair condition or worse – and with the looming bankruptcy of the Federal Highway Trust Fund – the need for new solutions is critical.

The State Long Range Plan proposes investing "in all transportation modes" and acknowledges the need for "adding new capital . . . expanding transit and rail passenger service." (MichSLRP "Preferred Vision", p.18)

Because travel by rail is safe, energy efficient, cost effective, and convenient, it seems clear that the state's rail system offers the greatest potential for meeting future travel needs, given the challenges outlined above.

The transportation sector accounts for nearly a third of U.S. energy consumption. Cars and light trucks account for 60% of U.S. energy consumption, domestic air carriers 7%, Class I freight railroads 2%, and commuter- and intercity-rail a tiny 0.2%. (ORNL, Table 2.6)

On the basis on energy consumed per passenger mile, passenger rail (Amtrak) is 27% more efficient than cars, 57% more efficient than light trucks, and 43% more efficient than certified route airlines.

Transportation Mode	Btu per passenger mile
Personal trucks	4,329
Certified air route	3.959
Cars	3,496
Intercity rail (Amtrak)	2,760

Source: Transportation Energy Data Book, Edition 26 (2007), Table 2.12

Technical improvements in equipment and changes in operating procedures have allowed Amtrak to cut its fuel use 10% over the period 2004-2006 – even while carrying more people on more trains (AMTRK-1).

Despite these efficiencies, rising fuel prices added $43 million to operating expenses over the period. This fact highlights the need for excellent track and signal maintenance and efficient dispatching to avoid fuel-wasting delays while enroute.

Growing concern with greenhouse gas emissions and the implications for global climate change make it likely that carbon will be regulated in the near future. Because the transportation sector accounts for almost a third of U.S. energy use, the highest share recorded since 1970 (ORNL, Table 2.1), and a third of the carbon dioxide emissions (ORNL, Table 11.4), the need for fundamental change is clear.

Passenger train travel, being more fuel efficient on a per passenger mile basis, will emit far less carbon dioxide.

For a trip of 280 miles, roughly the distance between Chicago and Detroit, one standard 5-car passenger train carrying 300 passengers will emit 19.5 tons less CO^2 than 191 automobiles carrying an equivalent number of passengers and almost 13 tons less CO^2 than the two airplanes needed to carry the same number of passengers (adapted from GHG spreadsheet developed by ELPC).

gal.fuel used[a] x CO^2 factor[b] = CO^2 emissions per vehicle
CO^2 emissions per vehicle x no.vehicles to move 300 people = lbs. CO^2

Intercity Train (diesel) – a 5-car train will move 310 people
(281[c] x 1.75) x 22.384 = 11,007 x 1 = 11,007 lbs or 5.5 tons CO^2

Automobile – at 1.57 passengers per automobile, 191 vehicles needed to move 300
(279 / 20.8) x 19.594 = 263 x 191 = 50,199 lbs. or 25 tons CO^2

Air – a Boeing 737-700 seats149 in all economy configuration
(0.9 hr. x 970) x 21.095 = 18, 415.935 x 2 = 36,832 lbs. or 18.4 tons CO^2

[a] based on Amtrak 1.75 gals/train mile est.; 20.8 mpg fleet average for automobiles; Air Transport Action Group est. of 970 gal jet fuel/flight hour
[b] CO^2 factor calculated by Energy Information Administration

Aside from the substantial savings in fuel use and harmful emissions, train travel has some less obvious, but important, advantages over air travel. Train stations are typically located in downtown areas, thus saving the time and fuel needed to drive to airports many miles from the urban center. In addition, trains serve many smaller communities that have no commercial air service, bringing people to jobs, shopping and education facilities.

In summary, passenger rail offers a number of public benefits, among them:

- Time- and cost-effectiveness
- Safety
- Fuel efficiency
- Fewer harmful emissions

Americans are responding by riding the trains in record numbers and demanding faster and more frequent trains. A recent Harris poll asked "Who should have an increasing share of passenger transportation?" 44% of respondents said passenger trains should have an increasing share, with commuter trains a close second at 35%. A mere 11% favored an increasing share for cars. Movement of goods by freight rail was favored by 63%. Asked about their priorities for future passenger transportation, 47% said safety was their first concern, 44% said energy efficiency, while only 29% rated cost as a priority. (Harris)

Investment of public dollars at all levels has spurred economic development in urban centers. Rising fuel costs and concerns with greenhouse gas emissions demand expansion of the transportation system to include greater reliance on trains - passenger, commuter and freight - to move people and goods.

Continued success will require a mutually beneficial partnership with the freight railroad industry, an industry that offers many of the same public benefits.

In conclusion, passenger trains offer substantial public benefits that include safety, convenience, and cost-effectiveness, while lowering emissions of greenhouse gases

> *Improving trip times and increasing the number of trains on corridors connecting the nation's downtown business centers can significantly improve regional transportation, often at a fraction of the cost of expanding highway or airport capacity. Many states have focused on rail corridor development as a critical element of improving access to city centers. With modest funding, these corridors could be able to better manage growing highway congestion and provide important environmental, economic and transportation benefits.*
>
> *-- Amtrak Government Affairs "Corridor & State Trains", February 2007*

* *

REFERENCES

AMTRK-1 "Energy Efficient Travel", June 2006
http://www.amtrak.com/pdf/Energy_Efficient_Travel.pdf

AMTRK-2 Amtrak Fact Sheet, FY 2006 "State of Michigan"
http://www.amtrak.com/pdf/factsheets/MICHIGAN06.pdf

AMTRK-3 Amtrak Government Affairs "Corridor and State Trains" (Feb. 2007)
http://www.amtrak.com/pdf/CorridorTrains.pdf

ELPC Environmental Law & Policy Center, Chicago IL
http://www.elpc.org

Harris The Harris Poll #14, February 8, 2006
www.harrisinteractive.com/harris_poll/index.asp?PID=638

TRIP Michigan Report, "Saving Lives, Time, and Money" (June 2006)
www.tripnet.org/MichiganInterstateReport062706.pdf

MichSLRP Michigan State Long Range Plan
www.michigan.gov.mdot

MWRRI-1 Midwest Regional Rail System, "Benefiting Michigan's Economy"

http://michigan.gov/documents/mdot/MDOT-MWRRI_Michigan_brochure_193255_7.pdf

MWRRI-2 Midwest Regional Rail System, Executive Report (September, 2004) http://michigan.gov/documents/mdot/MDOT-MWRRI_Executive_Report_193254_7.pdf

ORNL Transportation Energy Data Book: Edition 26 (2007), published by the Oak Ridge National Laboratory, Center for Transportation Analysis http://cta.ornl.gov/data/index.shtml

SafetyTR Highway Safety Technical Report (MDOT 2006) http://michigan.gov/documents/MDOT_TR_Safety_Report_7-28-06_166942_7.pdf

SocioecTR Socioeconomics Technical Report (MDOT 2006) http://michigan.gov/documents/MDOT_SocioecTR_20060807_Final_167566_7.pdf

Community Benefits Coalition

420 Leigh
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April 28, 2008

Sent Via Email 4/29/08 at 5:50pm and 6:21pm
Sent Via Fax 4/29/08 at 7:35pm
Sent US Mail 4/29/08

Mr. Robert H. Parsons
Public Involvement and Hearing Officer
Bureau of Transportation Planning
Michigan Department of Transportation
P.O. Box 30050
Lansing. Michigan 48909

To Whom It May Concern:

The Board of Director of the Community Benefits Coalition submits the following formal comments concerning the Draft Environmental Impact Statement Evaluation for the Detroit River International Crossing Study.

The Community Benefits Coalition supports a publicly-owned international bridge crossing, as stated in the coalition's Vision Statement attached. In commenting on the DEIS, we note that specific mitigating features for each alternative are not included, and we therefore cannot reasonably consider what alternative is better than another. However, based on what we do know, we make these comments.

1) As outlined in the Draft Environmental Impact Statement, all DRIC alternatives will severely affect neighborhoods that already bear disproportionate negative impacts 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. These areas have a high percentage of low income and minority individuals. In addition, there is a myriad of environmental issues, especially air quality, which would be made worse by a new border crossing. During the DRIC study, a number of community meetings were held in which community residents helped to formulate plans to redevelop the Delray neighborhood and the impacted area. 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 for the new community that the residents designed. These land use plans represent a significant step toward ensuring that local host community impacts and growth are included in the final project design for a new international border crossing.

2) We also believe the best way for this to occur is the formulation of a legally binding community benefits agreement between the residents, local organizations, the State of Michigan, and the Federal Highway Administration. Such an agreement would legally guarantee that the explicit and implicit promises made to the host neighborhoods would be fulfilled. This would also insure that there would be economic reciprocity between the

international border crossing entity and businesses, non-profit agencies, and community members in the impact area. As noted above, the residents of Delray and other impacted areas have organized themselves in order to request that the State of Michigan and the Federal Highway Administration conclude with us a legally binding community benefits agreement. It is our sincere hope that the State and Federal agencies recognize our group and work with it to achieve the promise of beautiful and vital neighborhoods coexisting with a new international crossing which will benefit everyone.

3) Central to the above redevelopment is the need to build infill housing and to redevelop the commercial areas of Jefferson, Fort St., the new DRIC interchange and plaza, West End Street, and Dearborn Street. A community benefit agreement should include but not be limited to the following points:

a) Building new homes within the impact area, which will replace single resident housing taken for the DRIC project. These homes will be planned in a pleasing and comprehensive manner, which takes into account new concepts of urban planning and development. These homes would be offered first to relocated residents.
b) Building within the impact area infill housing for housing lost to neglect of the community.
c) Mitigating and replacing homes and businesses lost to the proposed areas of the interchange, road alterations, and surrounding the plaza.
d) Redeveloping existing areas and creating new commercial areas, which will attract new residents and visitors, and which will increase economic growth.
e) Funding for workforce training and new business incubation
f) Insuring easy access to comprehensive health services within the impact area south of the I-75 freeway for all available means of transportation including vehicular, mass transit and non-motorized.
g) Maintaining sidewalk and street connections for pedestrians and all forms of non-motorized transportation throughout the impact area and between the north and south sides of I-75 freeway. All connections including pedestrian overpasses would be at a distance of no more than one-quarter mile, which is the generally accepted normal walking distance.
h) Designating and enforcing truck routes to keep trucks off of residential streets
i) Facilitating a legislative remedy or providing compensation to reduce the negative impact of the "pop up tax" on relocated residents. In addition, all relocated residents will be offered replacement housing of equivalent or higher value.
j) Protection of all historical and archeological sites.
k) Protecting and promoting Fort Wayne, including providing attractive and easy access to this important historic, recreational, and economic benefit to the community.

The implementation of the community benefits agreement must be concurrent with the development of the DRIC project.

4) We do not find convincing the claims in the DEIS that air quality will improve with the construction of the project. Air quality in Delray and the immediate surrounding area will clearly be negatively impacted with the construction of the DRIC. 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. We have included specific mitigation requirements that we would like to have implemented during the construction process and operation of the bridge as an attachment to this letter.

Community Benefits Coalition therefore formally requests a meeting with MDOT and other appropriate state agencies to discuss implementing a community benefits agreement, which will insure the redevelopment of Delray, the DRIC interchange and plaza areas, and all other affected areas in Southwest Detroit. Because of the importance of the above issues, we ask that a meeting be set within 60 days of the announcement of the preferred alternative.

While a new border crossing will have serious detrimental effect on a very fragile community, it can also act as a catalyst for redevelopment. We sincerely hope that this incredible opportunity is seized by the State of Michigan and its full potential is realized.

Please find Attachment A: Vision Statement of the Community Benefits Coalition, and Attachment B: Mitigation requirements.

Thank you very much for your consideration of our comments.

Sincerely,

The undersigned Board Members

Scott Brines

Tom Cervenak

Maria Finn

Lisa Goldstein

Giancarlo Guzman

Shirley Harbin

Mario Hernandez

Mary Loubriel

John Nagy

Denise Pike

Debra Williams

B. Parsons, MDOT / DRIC-DEIS Comments
Community Benefits Coalition, April 29, 2008

Attachment A

Vision Statement of the Community Benefits Coalition

"We envision a community in which area residents and a new publicly-owned international border crossing will mutually coexist and benefit from each other.

Our vision includes those areas of Southwest Detroit impacted by the border crossing and transportation infrastructure, 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 Delray and other impacted Southwest Detroit area residents.

Without endorsing any outcomes beyond this vision statement, we support the continued funding, community involvement in, and completion of the DRIC Study."

B. Parsons, MDOT / DRIC-DEIS Comments
Community Benefits Coalition, April 29, 2008

Attachment B

Environmental Mitigation

The following comments on mitigation requirements for the DRIC project are not all-inclusive, but rather a starting point. These comments address only air quality issues in the construction and operation stages of the DRIC project. Separate mitigation will need to be included for various other environmental issues associated with the DRIC project.

Air Quality Construction Mitigation Plan

The FEIS needs to incorporate a number of mitigation measures for the construction phase of the project to minimize adverse air quality impacts to the local community. Elements of this mitigation plan should include:

- limiting the age of on-road vehicles used in construction
- minimizing engine operations
- restricting construction activities around Southwestern High School and other sensitive receptors
- instituting fugitive dust control plans
- using diesel particulate traps and oxidations catalysts on construction vehicles
- using existing power sources or clean field generators rather than temporary power generators
- require contractors use construction equipment that at least meets EPA'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
- regular sweeping of roads to minimize fugitive dust
- use of alternative cleaner burning fuels when possible

Ongoing Air Quality Mitigation

Once the border crossing is opened a number of mitigation measures should be instituted to minimize the impacts of mobile source emissions from the high volume of traffic on the community and to monitor the impacts of this traffic on air quality. Mitigation measures should include:

- enforcing anti-idling policies during truck inspections and all areas possible
- air filtration systems for systems for sensitive receptors, including Southwestern High school
- Funding for comprehensive air monitoring in the impacted area including mobile source air toxics, PM 2.5, PM10, SO2 and continuous EC/OC sampling, PM2.5 speciation measurements and continuous PM 2.5
- Regular sweeping of area roads
- The project design should include landscaping using native and non-invasive vegetation to help absorb pollution, reduce fugitive dust and approve overall aesthetics in the vicinity of the project

DETROIT HISPANIC DEVELOPMENT CORPORATION

"Partnering to Make a Difference in the Community"

April 22, 2008

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

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

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

Dear Sirs:

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

The community selected for this new crossing is already inundated with heavy industry, including automotive factories, steel plants, oil refineries, and so on. Needless to say, the emissions from these facilities are in the hundred of thousands of tons per year and consist of some of the most toxic material around. The combined amounts of toxins in our estimation, as well as those of many scientists, are causing dangerous health problems and premature deaths of many residents in the area. Detroit is also one of the worst cities in the nation in terms of fine particle, or "soot," pollution. Fine particles have been linked to a wide variety of serious health impacts, from upper and lower respiratory ailments, such as asthma to heart attacks and strokes, including crib death in children.

Indeed, Detroit asthma rates are some of the highest in Michigan. These exposures are found in the African-American, Hispanic, and low-income communities in the city compared to the surrounding Wayne County area and higher income areas in Michigan. In Southwest Detroit, for example, 1 in 5 children already suffer from asthma

and African-American children are hospitalized for asthmas at a rate 4.2 times higher than white children.

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

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

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

Sincerely,

Angela G. Reyes
Executive Director

cc: Sen. Debbie Stabenow
Sen. Carl Levin
Congresswoman Carolyn Cheeks Kilpatrick
cc: David Wresinski, Administrator
Project Planning Division
Michigan Department of Transportation

phone: 519-973-1116 fax: 519-973-8360

CITIZENS ENVIRONMENT ALLIANCE
of southwestern Ontario

May 29, 2008

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

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

Dear Mr. Parsons,

This letter is forwarded to you in support of a submission sent by Mr. Dietrich R. Bergmann on April 29, 2008.

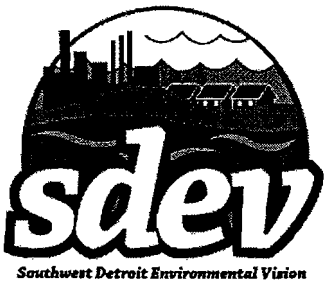
The examples outlined by Mr. Bergmann to modify travel demand: differential tolls, peak period travel disincentives, reversible lanes would have the effect of reducing some current transportation impacts on environmental quality in the international border region. Additionally, strategic transportation demand management options such as intermodal rail diversion of truck traffic and a light rail public transportation option may further lessen environmental impacts as compared to additional road-based border crossings.

It would be prudent to view current oil supplies as a permanent trend and plan accordingly. Transportation options that lessen the use of fuel per mile and per kilometer travelled, are more sustainable and will be a necessity in southeast Michigan, southwestern Ontario and beyond. 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.

Sincerely,

Derek Coronado, M.A., Research and Policy Coordinator

1950 Ottawa Street, Windsor, ON, N8Y 1R7
citizensenvironmentalliance.org email: ceaadmin@cogeco.net



May 29, 2008 Sent via Email & Fax

Mr. Robert Parsons
Public Involvement and Hearing Officer
Bureau of Transportation Planning PO Box 30050
Lansing, MI 48909

Dear Mr. Parsons:

Please accept the following comments on the Draft Environmental Impact Statement for the Detroit River International Crossing as a formal response from Southwest Detroit Environmental Vision, and an addendum to our response filed April 29, 2008.

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 to economic activity associated with the international border crossing.

This comment pertains to truck traffic with local destinations, which has been evident before and will continue beyond completion of the Gateway project.

With the closure of the Livernois-Dragoon access to I-75, which has inappropriately become a default truck route, trucks are likely to be forced onto West End and Dearborn streets in the more populated area of Delray. A designated trucks-only route should be located where most effective relative to the plaza entrance/exit points and in consideration of existing truck traffic patterns in the vicinity and how these will be affected by DRIC road closures and alterations.

Also, localized air quality impacts should be mitigated not only at Southwestern High School but also at Beard Early Childhood Center, consistent with our and DPS's prior air mitigation comments.

Sincerely,

Lisa Goldstein, Director

May 29, 2008

Mr. Robert Parsons
Public Involvement and Hearing Officer
Bureau of Transportation Planning P>O>Box 30050
Lansing, MI 48909

Dear Mr. Parsons:

Please accept the following comments on the Draft Environmental Impact Statement for the Detroit River International Crossing as the formal response from the Southwest Detroit Business Association.

We are in support of all the comments of the Community Benefits Coalition.

We unconditionally support a publicly owned international crossing under all circumstances.

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.

The construction of any new international border crossing must include coordination with all other trade routes, including water, rail, and freeway connections, and maximize the opportunity as described in the Brookings Institute report(Vital Connection) for transportation logistics development in SW Detroit, the city, and the region.

The implementation of all mitigation must be concurrent with the implementation of any international border crossing.

Any increase in traffic in the locally effected community must include an increase in the quality of air in that same community, through a requirement to improve any and all sources of air quality compromise.

No project of this magnitude should ever be undertaken without sufficient resources provided to the community for its own professional analysis and consideration.

Sincerely,

Lydia Gutierrez, Chairman

Bob Parsons - TRU comment on the DEIS for the DRIC

From: "Megan Owens" [redacted]
To: <parsonsb@michigan.gov>
Date: 5/2/2008 12:52PM
Subject: TRU comment on the DEIS for the DRIC

May 2, 2008

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

Dear Mr. Parsons:

This letter is submitted as a comment on the Draft Environmental Impact Statement (DEIS) on the Detroit River International Crossing project (DRIC). We ask that this letter be accepted for inclusion in the DRIC DEIS public comment record. Although the comment deadline recently passed, we believe it is important that MDOT and the FHWA know of our concerns about the DRIC project.

Transportation Riders United (TRU) is incorporated in Michigan as a 501(c)(3) non-profit charitable organization. Our mission is to improve transportation access and mobility in Greater Detroit. Specifically, we work to inform and educate the public and officials about the importance of public transportation options; promote discourse on local, regional, and state developments relating to transportation; improve public transportation; and promote alternatives to unnecessary highway expansion.

We would like to support comments submitted to you dated April 29, 2008 from TRU member and engineer Dietrich R. Bergmann. He identifies a number of reasonable alternatives for the DRIC project that should be considered in a supplemental DEIS. As he notes, all reasonable alternatives should be evaluated objectively and that the evaluations should be included within the DEIS document or within one or more supplemental DEIS documents.

Particularly, 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, south on Oullette Avenue in Windsor, and then east and west on at least two branch lines from Oullette.

The DEIS on page 1-9 states that 79% of the automobile traffic between Detroit and Windsor is traffic that is local to the combined SEMCOG/Essex County region. An improved transit alternative would eliminate a lot of peak period auto traffic, thereby diminishing the need to add new highway capacity over or under the Detroit River. While useful, the existing tunnel bus service is insufficient to truly meet the needs of the traveling public.

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 than to process people traveling in automobiles.

A public transportation system extending across the border at the foot of Woodward appears to us to be a "reasonable alternative", as that term is used in the Council on Environmental Quality regulations [40 CFR 1502] that governs the preparation of Environmental Impact Statements. It therefore is necessary to comprehensively evaluate that option as an alternative to building a new bridge at this time and to document that evaluation in a supplemental DEIS, as required by 40 CFR 1502.9.

Thank you for your careful consideration of our thoughts and concerns on this matter.

Sincerely,

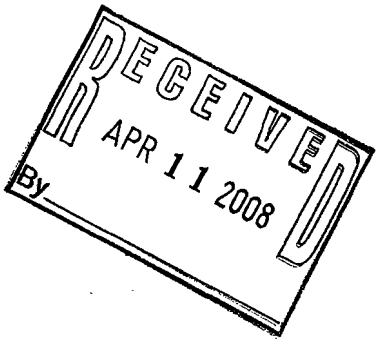
Megan Owens, Executive Director
Transportation Riders United

Megan Owens
Executive Director, Transportation Riders United (TRU)
www.DetroitTransit.org

TRU is a Detroit non-profit group dedicated to improving and promoting public transit in greater Detroit.

500 Griswold, Suite 1650
Detroit, Michigan 48226 [redacted]

HBA
Hispanic Business Alliance



April 8, 2008

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

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

Re: Environmental Justice and the Detroit River International Crossing

Dear Sirs:

I am writing to you regarding the Environmental Justice consequences of the Detroit River International Crossing (DRIC) on behalf of the Hispanic Business Alliance. 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.

The Hispanic Business Alliance (HBA) was founded in 1978 as an advocate for Hispanic businesses and individuals in Detroit and throughout Michigan. Our goal is to promote and support the development of business and individuals by providing opportunities for networking, procurement and partnership. We fear that the DRIC project runs counter to this goal.

HBA has serious concerns about the DRIC project, given its potential to adversely impact particularly vulnerable Hispanic businesses and individuals in Detroit, and particularly in the Delray community. HBA has preliminarily reviewed the Draft Environmental Impact Statement (DEIS) that your agencies recently published, and believes that it fails to address these impacts in a manner consistent with Environmental Justice. For example,

- 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

1434 Michigan Avenue | Detroit, Michigan 48216 | Office: 313.962.6HBA (6422) | 313.965.6512 | Fax: 313.965.6513 | www.hbaweb.org

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.

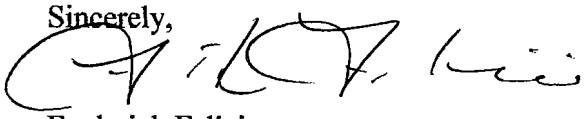
- There is no discussion in the environmental justice analysis concerning potential impacts to the community from noise and traffic emissions, even though the DRIC project envisions major changes in traffic patterns as a result of the new bridge. The DEIS must consider whether the Hispanic and other minority population in Delray will be adversely affected by noise and emissions from those changed patterns.

- HBA is further concerned that your agencies did not include a health risk assessment for the neighborhood residents. The additional automobile and truck traffic that will be generated by the DRIC project, particularly in connection with the customs plaza, is a serious threat to the health of residents. Additional effort must be made to quantify such potentially serious increases as to both acute and chronic exposure risk, as well increased cancer risk from the listed acute and hazardous air toxics.

- 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.

In short, HBA believes that this DEIS's environmental justice analysis is woefully deficient. This deficiency likely stems from your agencies' failure to effectively involve the affected populations in the planning for this project. The preferred alternative should not be selected on the basis of this analysis. Rather, 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. Pending this sort of extension, it is our view that your agencies must revisit, revise and re-circulate for comment their Draft Environmental Justice analysis.

Sincerely,



Frederick Feliciano,
President

LA SED

Latin Americans for Social & Economic Development, Inc.

Administrative Building
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Detroit, MI 48209
Tel.: (313) 554-2025 • Fax: (313) 554-2242

www.lasedinc.org
Serving the Southwest Detroit Community
Since 1969

April 28, 2008

David Williams
Environmental Program Manager
Federal Highway Administration
315 W. Allegan St., Room 201
Lansing, MI 48933

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

Dear Gentlemen:

I am writing on behalf of the Latin Americans for Social and Economic Development, Inc. (LA SED, Inc.) an organization founded in 1969 to support the Latino community and all residents of southwest Detroit. We are concerned that the Draft Environmental Impact Statement (DEIS) recently released by your agencies does not fully catalogue the effects of the proposed Detroit River International Crossing (DRIC) project on the population in the Delray community. For this reason, we request an extension of the comment period that will allow a thorough review of the project's impacts.

Detroit has a well-known and unfortunate history of destroying racially-diverse neighborhoods with transportation projects. In the 1060s, for example, the African-American enclave of Black Bottom was bulldozed in response to so-called "urban blight" and to make way for construction of I-75. The project also plowed over many black-owned business, social institutions, and jazz clubs and displaced many residents to large-scale public housing projects. The construction of I-75 also affected the Hispanic community around the Mexicantown area. As for Delray itself, construction of the I-75 River Rouge overpass in 1965 and the city's expanded sewage treatment plan in 1974 cast a long shadow over the community and demolished hundreds of homes and several businesses.

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

We are very concerned that the new DRIC bridge could further divide Delray and further suffocate the community's efforts to revitalize. The Delray area is already inundated with heavy industry, including automotive factories, steel plants, oil refineries, and so on. Detroit is also one of the worst cities in the nation in terms of fine particle, or "soot", pollution. Fine particles have been linked to a wide variety of serious health impacts to residents of southwest Detroit.

For all of these reasons, we respectfully ask for a 90-day extension of the public comment period currently scheduled to end on April 29th.

Sincerely,

Horacio Vargas, Jr.
Executive Director

PEOPLE'S COMMUNITY SERVICES

412 WEST GRAND BOULEVARD
Thomas Cervenak, Executive Director
PHONE (313) 554 – 3111

DETROIT, MICHIGAN 48216
Sharon Williams, Board Chair
FAX (313) 554 – 3113

Accredited Member of
United Neighborhood
Centers of America

April 25, 2008

Mr. Robert H. Parsons
Public Involvement and Hearing Officer
Bureau of Transportation Planning
Michigan Department of Transportation
P.O. Box 30050
Lansing. Michigan 48909

To Whom It May Concern:

As an original member of the Local Advisory Committee (LAC), People's Community Services would like to make the following points concerning the Draft Environmental Impact Statement/4(f) Evaluation for the Detroit River International Crossing Study:

1) The proposed alternatives impact an area that is already severely distressed, the Delray neighborhood. It is an area with a high percentage of low income and minority individuals. This area, which People's Community Services has served since 1920, also has a multitude of environmental issues especially air quality that could be made worse by an increase of truck traffic at a new border crossing. During the DRIC study, a number of community meetings were held in which community residents helped to formulate plans to redevelop the Delray neighborhood. 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 for the new community the residents designed.

2) We believe 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. The residents, organizations and stakeholders of Delray and other impacted areas have organized in order to request that the State of Michigan and other appropriate governmental entities actually conclude a legally binding community benefits agreement. It is our sincere hope that the State recognizes this group and works with it to achieve a beautiful redeveloped community, a community that the entire region will be able to look upon with pride.

3) Central to this 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. Our agency has been working to develop plans for the implementation of the DRIC land usage plan. This includes the formation last year of a non-profit community development subsidiary of People's Community Services. We are also developing partnerships with other community development corporations in order to move the redevelopment forward in the most expeditious manner. People's Community Services envisions a lovely community with new housing and commercial development. The housing could be modeled on the New Urbanism model, which will link residents together in a fully functioning community, which values the human person. In addition, housing could be designed in attractive distinctive styles that will help bring new residents in. For instance, new homes could be designed on a southwest or Mexican style, which would draw new Latino immigrants into Delray. In addition, the new homes near the Delray boat lunch could be designed in a nautical or "Cap Cod" style that would attract boaters to move into the Delray neighborhood. This would be especially true if boat storage space was incorporated into the design for the yards.

4) 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 how the implementation of the DRIC land usage plans could be achieved with support from the federal government, the State of Michigan and local community groups.

While a new border crossing will have serious detrimental effect on a very fragile community, it can also act as a catalyst for the redevelopment of a beautiful and livable community. We sincerely hope that this opportunity is taken. Thank you very much for your consideration of our comments.

Sincerely,

Thomas Cervenak
Executive Director

Southwest Detroit Environmental Vision
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Detroit, MI 48209

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FAX: (313) 842-2158
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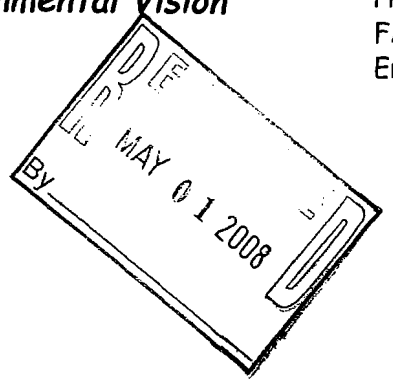
April 29, 2008



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

Dear Mr. Parsons:

RE: Comments on Draft Environmental Impact Statement for proposed Detroit River International Crossing

Southwest Detroit Environmental Vision(SDEV) is a community based environmental organization with a mission to improve the environment and strengthen the economy of Southwest Detroit. For the past 15 years SDEV has worked with government, industry and residents to find common ground to promote projects that improve the economy of Southwest Detroit and minimize negative environmental impacts for the community. A SDEV representative has served as a member of the DRIC Local Advisory Committee and the organization has been actively participating in the public process for the proposed DRIC since the inception of the study.

COMMUNITY BENEFITS AGREEMENT

SDEV is serving as a coordinating agency for the newly formed DRIC Community Benefits Coalition. The Community Benefits Coalition supports a publicly-owned international bridge crossing as stated in the coalition's Vision Statement.

> "We envision a community in which area residents and a new publicly-owned international border crossing will mutually coexist and benefit from each other.
>
> Our vision includes those areas of Southwest Detroit impacted by the border crossing and transportation infrastructure, 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 Delray and other impacted Southwest Detroit area residents.

Without endorsing any outcomes beyond this vision statement, we support the continued funding, community involvement in, and completion of the DRIC Study."

As outlined in the draft DEIS, all alternatives listed in the Draft Environmental Impact Statement severely affect neighborhoods that already bear the disproportionate burden of the negative impacts from 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. These areas have a high percentage of low income and minority individuals, making environmental justice issues significant factors in this project. Environmental issues including noise, visual and spatial impact, and especially air quality, would be made worse by a new border crossing. During the DRIC study, a number of community meetings were held in which community residents helped to formulate plans to redevelop the Delray neighborhood and the impacted area. It is a matter 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. These land use plans represent a significant step toward ensuring that local host community impacts and growth are included in the final project design for a new international border crossing.

We also believe the best way for this to occur is the formulation of a legally binding community benefits agreement between the residents, local organizations, the State of Michigan, and the Federal Highway Administration. Such an agreement would legally guarantee that the explicit and implicit promises made to the host neighborhoods would be fulfilled. This would also insure that there would be economic reciprocity between the international border crossing entity and businesses, non-profit agencies, and community members in the impact area. As noted, the residents of Delray and other impacted areas have organized themselves in order to request that the State of Michigan and the Federal Highway Administration conclude with us a legally binding community benefits agreement and work with us to realize the promise of a revitalized area coexisting with a new international crossing which will benefit everyone.

As the primary location for international border crossing serving the North American Free Trade Agreement, southwest Detroit is a pivotally important location to the nation. As such, the area is forced to accommodate the burdens associated with this distinction, on top of bearing the burdens of being one of the most heavily industrial areas of the country. An economic project on the scale of the DRIC will bring revenues to the associated governments over generations. The potentially negative impacts of this development will also be born by the community for generations. Thus, the positive financial gains of this publicly-owned enterprise should be simultaneously shared with the community to ensure that the greatest technical and social innovations possible are employed to alleviate the burdens to residents and the community and to ensure that benefits are incorporated directly into the project.

COMMUNITY REDEVELOPMENT

The decayed state of the neighborhoods has occurred due to economic decline and disinvestment of the area, which has become an overall environmental issue for the

community needing attention. 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.

Central to the above redevelopment is the need to build infill housing and to redevelop the commercial areas of Jefferson, Fort St., the new DRIC interchange and plaza, West End Street, and Dearborn Street. A community benefits agreement should include but not be limited to:

a) Building new homes within the impact area, which will replace single resident housing taken for the DRIC project;
b) Building infill housing within the impact area to replace housing lost to neglect of the community;
c) Mitigating and replacing homes and businesses lost to the proposed project;
d) Redeveloping existing areas and creating new commercial areas to increase local economic growth that will benefit all;
e) Funding for workforce training and new business incubation;
f) Insuring easy access to comprehensive health services within the impact area south of the I-75 freeway for all available means of transportation including vehicular, mass transit and non-motorized;
g) Maintaining sidewalk and street connections for pedestrians and all forms of non-motorized transportation throughout the impact area and between the north and south sides of I-75 freeway. All connections including pedestrian overpasses would be at a distance of no more than one-quarter mile, which is the generally accepted normal walking distance;
h) Designating and enforcing truck routes to keep trucks off of residential streets;
i) Facilitating a legislative remedy or providing compensation to reduce the negative impact of the "pop up tax" on relocated residents. In addition, all relocated residents will be offered replacement housing of equivalent or higher value;
j) Protection of all historical and archeological sites;
k) Protecting and promoting Fort Wayne, including providing attractive and easy access to this important historic, recreational, and economic benefit to the community;
l) Protecting areas identified for greenways in the non-motorized transportation plan and other regional greenway efforts, and facilitating greenway and non-motorized linkages in this project, including providing for non-motorized transportation infrastructure in the entire bridge project, which can facilitate positive local economic development and provide positive transportation alternatives;
m) Implementing the community benefits agreement concurrently with the development of the DRIC project.

ENVIRONMENTAL CONCERNS

While SDEV supports efforts to ensure redevelopment of the community through implementation of a community benefits agreement, the organization believes that mitigation of environmental impacts should be included as elements of the FEIS and should be funded as part of the project construction costs. In commenting on the DEIS, we note that specific mitigating features for each alternative are not included, and we therefore cannot reasonably consider which alternative has fewer environmental impacts. However, based on what we do know, we make these comments.

Air Quality

We do not find convincing the claims made in the DEIS that air quality will improve with the construction of the project. Air quality in Delray and the immediate surrounding area will clearly be negatively impacted with the construction of the DRIC. It is critical that mitigation of localized air quality impacts are included in the FEIS and are funded as part of this project.

In hosting the DRIC, the populace of southwest Detroit will be undertaking another source of air pollutants adding to the already cumulative affects of air toxics in the community. High concentrations of diesel particulate matter, as found with the volume of traffic funneling into southwest Detroit from across North America, are directly associated with the development of lung diseases, including asthma, as well as more insidious cardiovascular diseases. Southwest Detroit has among the highest asthma rates in the nation, and the population suffers a high incidence of premature deaths from heart disease. A long-term population study to observe these health impacts should be promoted by MDOT and FHWA working with the National Institute of Health and other agencies. The highest standards possible for air quality should be pursued and maintained in association with this project over its lifetime.

Mobile Source Air Toxics

The Air Quality Impact Analysis acknowledges that Mobile Source Air Toxics would shift to the area near the proposed new river crossing systems from the Ambassador Bridge compared to the no build condition. 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. The Air Quality Analysis states that "available technical tools do not enable a prediction of the project-specific health impacts of the emission changes associated with the alternatives"(Page 4-2) The report highlights limitations of Mobile 6 and Caline 3. Public health experts that our organization has consulted indicate reasonable estimates can be made using these models for dispersion modeling. While there may be some level of uncertainty associated with this process the modeling should be completed to at least provide some projections of potential health impacts and to help inform mitigation strategies. The EPA 1999 National Air Toxics Assessment includes MSATs as part of total air toxic inventory and has methodology for

modeling the impacts of these pollutants. Throughout the DEIS estimates are made for traffic increases, economic benefits and other impacts from the project. There are uncertainties involved with all of these projections. Uncertainty should not be provided as a reason to not conduct necessary analysis of impacts of the project on people living, working and attending school in the impacted area.

Particulate Matter(PM 2.5)

The hot spot analysis for the DEIS claims that the proposed project will not cause new air quality violations, worsen existing violations or delay timely attainment of the NAAQS. Because of the high rates of asthma in Southwest Detroit and the cumulative impacts of multiple transportation and industrial operations in the community it is important that all efforts to minimize additional contribution of particulate matter in the community from this project be undertaken as mitigation.

Air Quality Construction Mitigation Plan

The FEIS needs to incorporate a number of mitigation measures for the construction phase of the project to minimize adverse air quality impacts to the local community. Elements of this mitigation plan should include:

- limiting the age of on-road vehicles used in construction
- minimizing engine operations
- restricting construction activities around Southwestern High School and other sensitive receptors
- instituting fugitive dust control plans
- using diesel particulate traps and oxidations catalysts on construction vehicles
- using existing power sources or clean field generators rather than temporary power generators
- require contractors use construction equipment that at least meets EPA'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
- regular sweeping of roads to minimize fugitive dust
- use of alternative cleaner burning fuels when possible

Ongoing air quality mitigation

Once the border crossing is opened a number of mitigation measures should be instituted to minimize the impacts of mobile source emissions from the high volume of traffic on the community and to monitor the impacts of this traffic on air quality. Mitigation measures should include:

- enforcement of anti-idling policies during truck inspections

- air filtration systems for systems for sensitive receptors, including Southwestern High school
- Funding for comprehensive air monitoring in the impacted area including mobile source air toxics, PM 2.5, PM10, SO2 and continuous EC/OC sampling, PM2.5 speciation measurements and continuous PM 2.5
- Regular sweeping of area roads
- The project design should include landscaping using native and non-invasive vegetation to help absorb pollution, reduce fugitive dust and approve overall aesthetics in the vicinity of the project

Noise and Vibrations

Infrastructure design that least impacts noise levels should be incorporated for the project, since stakeholders like Southwestern High School will bear a primary burden. Mitigation for increased noise from the project should be addressed in the FEIS. Although the DEIS states that impacts for noise are being considered for the southbound service drive of I-75, it indicates that sensitive receptors around the DRIC plaza would not experience noise levels exceeding the established noise abatement criteria. Because all impacts of a major project like the DRIC cannot be adequately predicted through study it is important that the FEIS contain a commitment to conduct noise monitoring measurements before the project begins, once the crossing is open and at some predicted intervals during the operation of the crossing. If noise levels are detected that exceed established criteria at any point during the operation of the crossing, mitigation measures should be taken to ensure the quality of life for residents, students and businesses are not negatively impacted.

IMPACTS TO LOCAL INSTITUITIONS

Chass Clinic

CHASS Clinic is one of only four FQHC organizations in the City of Detroit , providing primary care and related social services to the uninsured and underinsured in our community. In 2007 the clinic provided services to 13,202 users. It is critical that the alternative. CHASS is pursing construction of a new facility that will enable the organization to double its patient capacity and provide much needed access to health care service for the community. DRIC Alternative 5 would take a corner of the property where this new facility is planned to be built. We support the request of CHASS to have Alternative 5 removed from consideration. It is unacceptable for the DRIC project to result in lack of access to health care services for residents of the community.

Southwestern High School

All of the alternative locations for the potential DRIC project will be immediately adjacent to Southwestern High School and thus will significantly impact the current and future student populations. The current student population is roughly 1,000 students who also live in the near and broader impact area and bear the burdens of transportation infrastructure in southwest Detroit . These students experience asthma higher than the national average. The DRIC project would increase truck traffic in the immediate area, which will be further damaging to the students health, even though the DEIS contends that overall air quality will improve. Because of the potential impacts to student health from increased levels of particulate matter and mobile source air toxics it is critical that both increased monitoring and mitigation for the high school be incorporated into the FEIS for this proposed project. 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 overall size of this project increases the negative impacts that the school will face. All efforts should be made to ensure that the plaza and other infrastructure are designed for the most efficient use of space. The proposed plazas appear to more than double the size of the existing truck plaza for the Ambassador Bridge, which does not seem necessary.

Environmental impacts to the school will be significant, including impacts on air quality, noise, and congestion. At minimum, traffic routing, noise barriers, and vegetative buffering will be necessary to minimally reduce impacts. Any of the alternatives that provide more distance from traffic on the plaza would be preferred, as these may make differences in the local air quality.

Air quality mitigation for the school should be included in the project, including but not limited to:

- Installing an air filtration system throughout the school

- Reducing diesel emissions by: implementing idle-reduction technologies and programs on the plaza and other areas; and by pursuing strategies to offset overall diesel emissions through retrofitting area truck fleets with diesel reduction technologies

- Constructing an indoor recreation facility for the school, so students have healthy access to recreation like students have in other areas. Recreating opens lung passageways more fully making, them more vulnerable to the damaging effects of air pollution and illnesses like asthma. Access to healthy recreation is an environmental justice issue.

- . Funding for ongoing air monitoring of PM 2.5, PM10, SO2 and continuous EC/OC sampling, PM2.5 speciation measurements and continuous PM 2.5

measurements at the Southwestern High School site should be included in the implementation plan for this project.

•Buffering with large trees and other vegetation to help mitigate diesel particulate and dust from traffic.

A baseline health study of students should be conducted as well as annual health screenings to monitor the project impacts. The health of students must be assessed as part of the Final Environmental Impact Statement in order to adequately address potential risks and to monitor any ongoing impacts should the project be implemented.

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.

Improvements envisioned by the community for the area around the school should be implemented, including along Fort St .

As one of the most immediately impacted groups in the area due to the proximity of the school to the DRIC project, the school should receive overall positive investments in exchange for all of the negative burdens that the school will experience. Such investments in infrastructure should have direct benefits to the students to improve their quality of school life, such as investment in sports and technological equipment.

COMPREHENSIVE TRANSPORATION PLANNING

For almost a decade, community representatives have advocated for a coordinated and comprehensive approach to transportation infrastructure project planning such that community development objectives are supported rather than undermined. 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 projects dilutes the real impacts, particularly cumulative impacts, and misses the opportunities to gain greater efficiencies and public benefits.

The DRIC project offers an historic opportunity to address transportation needs of the single most important international trade crossing, and to approach this historic project in a manner that facilitates creating a viable host community into the future, one which will share in economic benefits locally and that will serve as an economic incubator for benefit of the entire cross-border region.

Achieving both of the goals of transportation and place-making requires vision and commitment, and some measure of patience not to pass-over the longer term benefits and sustainability for shorter term goals.

Bridges are said to be built for 100 years. For the many generations who will survive this project into an unpredictable future, the decision-makers today working in concert with the community can build into this project the best of what is available in this generation as a gift to those we do not yet know. This international crossing is not only a transportation route, but a pathway for an international relationship into the future.

A project of this scale demands that multiple agencies work together to cohesively design an overall system of transportation and place that maximizes efficiencies and serves multiple modes of travel, as well as achieves revitalized and healthy neighborhoods, new business development, protection and promotion of historic sites, and enhances community connectedness for all modes of transportation and social groups.

Without working together to maximize benefits and reduce mitigation, we would be wasting both resources and this momentous opportunity to make a lasting mark on the region.

TRUCK ROUTES

The residential streets, homes, and quality of live of the residents in southwest Detroit have suffered since the passage of NAFTA and for not having comprehensive truck routes and enforcement in place, as well as systematic maintenance roads to handle the daily onslaught and imposition of the nation's traffic funneling here due to international trade.

Surface streets that have become inadvertent and inappropriate truck routes need to be remedied in a new regional transportation plan. In particular, Livernois-Dragoon and the streets which have schools (Junction, Clark, Central, Vernor, etc.) need to be limited to local trucks only. The Vernor corridor has seen significant development in the last decade and Mexicantown has become the only growth area in the city. 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.

GREENWAYS AND THE RIVERFRONT

Various plans have been developed to create greenways and to accommodate non-motorized transportation in southwest Detroit, as well as link various Detroit neighborhoods particularly to the riverfront. The DRIC project, as a large-scale footprint at the riverfront, and is an opportunity for collaboration to achieve these greenway links and to reintroduce much-needed green space in the area—which aids in environmental mitigation.

All new roadway designs and changes should incorporate existing non-motorized and greenway plans, and maximize new potential connections to the riverfront and adjacent communities. Plans should also look to link with existing and new land bridges, green spaces, and parks.

PUBLIC PARTICIPATION

We commend MDOT for its efforts to encourage community involvement in the DRIC planning process through the Local Advisory Committee and through the Context Sensitive Design Planning Meetings. In spite of these commendable efforts we recommend that MDOT and the Federal Highway Administration take additional efforts to enhance the ability of citizens to participate in the NEPA process. The cost of the DRIC study has been over twenty million dollars. This has generated a DEIS document and fifteen technical reports. It is not reasonable to expect residents and community organizations to provide meaningful review of these documents without technical assistance from experts. 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. For a project the scale of the DRIC a minimum of $100,000 should be allocated for this type of community assistance.

We also have received feedback from a number of area residents that it has been very difficult to stay informed on the DRIC DEIS process. MDOT should consider providing some funding for independent evaluation of its outreach process to receive input on how to improve these efforts.

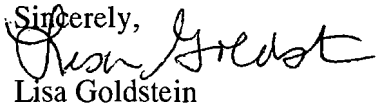
CONCLUSION

We urge MDOT and other appropriate state and federal agencies to discuss implementing a community benefits agreement, which will insure the redevelopment of Delray, the DRIC interchange and plaza areas, and all other areas in Southwest Detroit affected by the project. Because of the importance of the above issues, we ask that a meeting be set within representatives of the Community Benefits Coalition Board within 60 days of the announcement of the preferred alternative.

While a new border crossing will have serious detrimental effect on a very fragile community, it can also act as a catalyst for redevelopment and environmental improvement. We are in full support of a publicly-owned bridge and the mutual benefits that can arise from this opportunity which will bring revenues and benefits to the area long into the future.

Thank you very much for your consideration of our comments.

Sincerely,



Lisa Goldstein

Executive Director

MATRIX
HUMAN SERVICES
"Touching Hearts, Changing Lives"
Established 1906

Vistas Nuevas
Head Start
2051 Rosa Parks
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Suite 1 K
Detroit, Michigan
48216-1556

p. 313.962.5255
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April 18, 2008

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

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

Dear Mr. Williams and Mr. Wresinski:

I am a member of the Southwest Detroit community and the Director of Vistas Nuevas Head Start. Our community requires information in both Spanish and Arabic to be able to comment on the DRIC Draft EIS.

Vistas Nuevas Head Start Program serves 1400 families in the Southwest Detroit area, 80% of the families served are Spanish and Arabic speaking. The majority of our program forms are translated in Spanish and Arabic to make sure our families understand information sent to them.

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

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

Sincerely,

Debra Spring,
Director

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

Funded by the
US Department of
Health & Human Services
through the City of Detroit
Department of
Human Services

An Empowerment Zone
Project

S:\Support Ltrs\Bridge 041808.rtf

Mexican Patriotic Committee of Metro Detroit

P.O. Box 9358 Detroit, Michigan 48209
Phone 313-438-1660

April 14, 2008

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

Dear Mr. Wresinski:

Our all volunteer organization has been part of Southwest Detroit's growth since the early 1920's. In 1930, the Mexican Patriotic Committee became officially registered with the State of Michigan. We continue contributing to the economic growth as well as building our neighborhoods with our parents, our grandparents.

Our members have expressed concern about several issues affecting Southwest Detroit. At a recent meeting, there were efforts to explain what is being proposed for the Delray area. The information was overwhelming. Walls of maps, realms of books, even video set-up with lots of professional looking people asking the public if we had any questions. No one wanted to feel ignorant, so we didn't ask and tried to figure out the plans on our own.

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.

It is quite confusing with all the different projects in the area; Gateway, Tour the Detour, DIFT or DRIC, Second Span Bridge, something with the railroads. With our economy suffering, lay-offs, plants relocating, we need to take the time to make sure we get it right the first time to support the best plan with the least cost to tax payers and not have to do it again and waste time and money we don't have.

Sincerely,

Alicia Juarez, President
Mexican Patriotic Committee of Metro Detroit

Cc: David Williams, Environmental Program Manager
Senator Carl Levin
Senator Deborah Stabenow
Congresswoman Carolyn Kilpatrick

Most Holy Trinity School

1229 LaBrosse
Detroit, MI 48226
313-961-8855
Fax: 313-961-5797

April 18, 2008

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

David Wresinski, Administrator
Project Planning Division
Michigan Dept. of Transportation
PO Box 30050
Lansing, MI 48909

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

Dear Mr. Williams and Mr. Wresinski:

Most Holy Trinity School is located in southwest Detroit and has been an anchor in this community since its beginning in 1838. Our students and families live primarily in southwest Detroit and are directly impacted by the quality of life there. Detroit has a major problem with fine particle, or "soot", pollution. Fine particles have been linked to a wide variety of serious health issues, including asthma, heart attacks, strokes, and even crib death in children. The potential impacts of increased freight traffic as a result of a new bridge crossing and the associated infrastructure needs to be studied very closely in terms of the region's already poor air quality.

I believe it is essential to have an Environmental Justice and Health Impact Study completed and available for comment in the DEIS. I hope you will agree that the air quality and health of this community, which is composed of many people without access to proper health care, are among the most critical concerns related to a new border crossing. Please consider further and intensive study of the impact the location of this new bridge will have on the quality of life in this community.

Sincerely,

Kathleen McBride

Ms. Kathleen McBride
Principal

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

FROM THE DESK OF REV. JEFFERY BAKER

Mr. Robert Parsons, Public Involvement/Hearing Officer

MDOT

P. O. Box 30050, Lansing, MI. 48909

St. Paul A.M.E.C.-Southwest

579 S. Rademacher Detroit, MI. 48209

This is a letter of support for the new bridge going through Delray.

There are various reasons that I support the new bridge going through Delray.

1. *I am in support of the free trade that we benefit by our border crossing from Canada. Economically it is a benefit for the Detroit and Metropolitan area.*
2. *From a security point of view. We need another bridge instead of a span. Just incase something happen to one. We will still be able to operate.*
3. *The traffic with trucks have become so congested that there is a need for another crossing. Some days it is unbearable to get around because of the truck traffic from and to Canada. And this was taking place before the new construction on I-75.*
4. *There is a need for new life in Delray. Delray has become of the worst blighted area in Detroit. There is a need for new life in this community which I feel will happen with the construction of a new bridge.*

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.

So in conclusion, we support MDOT in this project whole heartily.

If you have any questions, you may contact me at:

Church: 313-843-8090
Home 313-345-2889
Mobile 313-515-3778

Working Together for a better tomorrow,

Rev. Jeffery L. Baker

Michigan Association of
Railroad Passengers, Inc.
P.O. Box 594
St. Clair Shores, MI 48080

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

re: Detroit River Internation Crossing (DRIC) Draft Environmental Impact Statement

Dear Mr. Parsons:

The Michigan Association of Railroad Passengers, Inc.has reviewed the subject DEIS document and has concluded that all of our comments on the document are already included within the comments being submitted to you by Dr. Dietrich R. Bergmann, PE with regard to the same DEIS.

Therefore, kindly consider his comments to be MARP's comments as well.

In addition, we would appreciate having the opportunity to review and comment on the origin-destination statistics and other data that are not yet available to fully appraise the DEIS.

Yours truly,

John D. DeLora,
Chairman