May 29, 2008

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.

The DRIC project should comprehensively provide for access to the plaza and bridge by pedestrians and bicycles, including a safe and recreationally effective pedestrian-bicycle lane on the bridge as well as necessary accompanying infrastructure for access on both sides of the border. Such infrastructure should be able to link to greenways and pedestrian-bicycle paths on both sides of the border that would potentially meet up with the project boundaries.

This infrastructure for the alternative modes of transport should seek to provide a functional alternative as well as a potentially viable recreational and economic opportunity which would be valuable for the international border region.

Please include as further explanation my comments previously submitted in writing at a DRIC public meeting on January 30, 2008. Quoting from those comments:

Present practice at other high-volume international crossings between the U.S. and Canada, like at Niagara Falls, confirms that pedestrian and bicycle crossing is not only existent but significant, and structures and systems can be appropriately designed to address any imagined security concerns. Present practice confirms that any concerns do not and should not outweigh non-motorized accommodation, and both federal and state law provides that such consideration must be addressed.

Including and promoting non-motorized accommodations in the DRIC project could encourage increased non-commercial cross-border travel, including daily visitors, which has fallen. Projecting an inviting and safe cross-border experience has value beyond its function.

Thank you,

Simone Sagovac, resident



29 May 2008

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

RE: Detoit River International Crossing (DRIC), Wayne County, Michigan "Draft Environmental Impact Statement and Draft Section 4(f) Evaluation" -- approved by Federal Highway Administration on 15 February 2008

Dear Mr. Parsons:

My letter dated 29 April 2008 consists of comments submitted for the record regarding the Draft Environmental Impact Statement (DEIS) identified above. This letter does not replace my 29 April 2008 letter. Rather, this letter serves as an addendum to my 29 April 2008 letter and the comments that follow therefore also are submitted for the DRIC DEIS record. Accordingly, please append this letter to my 29 April 2008 letter.

1. Abbreviations and their Definitions

The abbreviations used in this letter are identical to those used in my 29 April 2008 letter.

2. Introduction

Please refer to this section in my 29 April 2008 letter.

3. Context of the DEIS

Please refer to this section in my 29 April 2008 letter.

4. The DEIS needs clarification as to what the DRTP proposes to do

The Borealis webpage identified in Section 4 of my 29 April 2008 letter continues to be an active webpage.

In addition, the DRTP webpage providing answers to frequently-asked questions, $\underline{http://www.thejobstunnel.com/new/jobs-tunnel.php?nic=faqs}$, continues to be an active web page.

Further, a Crain's Detroit Business article published on 04 June 2007 (athttp://www.crainsdetroit.com/apps/pbcs.dll/article?AID=/20070604/SUB/706010360 statesthat DRTP requires approximately \$100,000,000 in US federal assistance to build the tunnel that

DRTP is proposing. The SEMCOG long range transportation plan line item described in my 29 April 2008 letter states that DRTP will require no local, state, or federal aid.

The inconsistencies between the DRIC DEIS document statement referred to in Section 4 of my 29 April 2008 letter and other published documents continue to require resolution. As noted on 29 April 2008, the inconsistencies can be cured if both of the two co-owners of the DRT submit for inclusion in the DEIS record a written statement clarifying their intentions regarding all of the following: the construction of the proposed high-clearance one-track tunnel, the disposition or alternate use of the existing two tubes comprising the existing DRT. In addition, the statement from DRTP's two partners also needs to make clear DRTP's need for federal assistance.

5. Rationale for Considering the BWB in the DEIS

Please refer to this section in my 29 April 2008 letter.

6. Existing and Projected Traffic on Detroit River Highway Crossings

As noted in my 29 April 2008 letter, the DEIS should be amended to clarify the traffic forecasting assumptions and to quantitatively evaluate at least the fare policy options identified in Section 6 of my 29 April 2008 letter.

7. Change in Forecast Base Year from 2004 to 2007 and Revision of Forecast for 20342035

In response to my request, MDOT on 22 May 2008 provided via email the 2005 through 2007 annual traffic counts for AMB and DWT. The report I received is reproduced immediately below.

		2,005	2,006	2,007
	Passenger Cars	5,865,633	6,113,114	5,649,619
Ambassador Bridge	Trucks	3,445,585	3,498,127	3,398,745
	Buses & Misc.	76,660	68,991	34,071
	TOTAL	9,387,878	9,680,232	9,082,435
	Passenger Cars	5,774,705	5,269,959	4,732,981
Detroit-Windsor Tunnel	Trucks	148,065	127,433	111,082
	Buses & Misc.	59,117	59,772	54,362
	TOTAL	5,981,887	5,457,164	4,898,425

ANNUAL TRAFFIC

If one combines the BWB annual traffic volume changes since 2004 (reported in my 29 April 2008 letter) with the AMB and DWT traffic volume changes since 2004 shown above, it is readily apparent that the total annual traffic demand on the three crossings combined has declined significantly since 2004 -- by 12% for passenger car traffic, 2% for commercial traffic, and 7% for PCE's (as defined on page 2 of my 29 April 2008 comments and also in the DEIS). Comments on page 8 of my 29 April 2008 submission refer to the DRIC forecasted compound

annual growth rates (CAGRs) for the total growth in traffic as being 2.9%/annum for automobile traffic and 3.3%/annum for commercial traffic, which means that the 2007 traffic volumes should have been about 10% greater than the 2004 traffic volumes.

It can be concluded that traffic growth forecasts on which the DRIC DEIS relied are not consistent with the reality of traffic flows observed during 2007. Even if the approximate 3% CAGR for traffic volume eventually is realized, the date that the capacity of the existing crossings will be matched by traffic demand perhaps will be in the order of five years later than the years indicated in Figure S-2 on page ES-2 of the DRIC DEIS.

The DEIS should be modified to present the traffic counts for the AMB, DWT, BWB and to amend the forecast for the planning horizon year, 2034 2035.

8. Modification of Forecasts to Reflect Changes in Fuel Prices Since 2004

I have nothing to add to this section of my 29 April 2008 letter other than to state that fuel prices have continued to increase since 29 April 2008 and that the justification for the conclusions of this section as stated on 29 April 2008 are even more justified now than they were on 29 April 2008.

9. Evaluation of Peak Period Travel for AMB, DWT, and BWB as a Group during 20342035

I have nothing to add to this section of my 29 April 2008 submission.

10. <u>Sensitivity of Peak Hour Travel Demand to Changes in Assumptions Made in Its</u> <u>Calculation; Peak Period Travel Disincentives; Evaluation of Reversible Lanes</u>

I have nothing to add to this section of my 29 April 2008 submission.

11. Michigan – Upstate New York Origin-Destination Statistics and Projections

I have nothing to add to this section of my 29 April 2008 submission.

12. US-Canada Travel Origin-Destination Statistics and Projections

Although I have received from the Province of Ontario some of the 1999 data referred to in this section of my 29 April 2008 submission, I have not yet had an opportunity to evaluate the data.

The 2005 data continue to be unavailable, apparently due to inaction by the Federal Highway Administration to execute its data sharing agreement with its Canadian counterpart agency.

As indicated in my 29 April 2008 submission, given the non-availability of the 2005 data, and given that practical alternatives to the DRIC project can not be evaluated without such data, it is imperative that the DEIS be amended to include the 2005 origin-destination information and then released to the public for additional comment.

13. Intermodal Rail Diversion of Truck Traffic

I wish to supplement the comments in this section of my 29 April 2008 letter with the following comments.

As noted in my 29 April 2008 submission, the TDF states that approximately 44% of the current total truck volumes on the AMB are divertible to rail. The total commercial vehicle volume on the AMB during calendar year 2004 was 3,370,000 vehicles [TDF, page 31 (pdf page 40)]. If one divides that figure by 365 and then by 2, and multiplies the result by 44%, it is apparent that more than 2,000 commercial vehicles travel each day in each direction between Detroit and the Greater Toronto Area (GTA).

The TDF forecast for year 2035 is that the total commercial traffic across the border in Detroit will be 8,060,000 [TDF, page 97 (pdf p. 106)]. Interpolating that number to a daily truck traffic volume of travel and assuming that the commercial traffic between Detroit and the GTA is still 44% of the total, it is apparent that the average truck traffic between the two locations will be more than 4,800 per day/direction.

An intermodal train with one 4,000 hp engine can pull a train consisting of 100 semi trailers, especially if it is a train consisting of Roadrailer type highway trailers. Thus the market for rail transport of trailers between Detroit and the GTA at present is approximately one train leaving from each end of the route once every hour, 20 hours per day. As of 2035, that market potential increases to one train leaving each end of the route every 30 minutes.

The typical tractor required to haul one semi-trailer on a highway is equipped with a 400 horsepower engine, which means that 100 trailers towed on a highway require a total propulsion capacity of 40,000 horsepower, instead of 4,000 horsepower if transported by railroad. Theoretically there could be a 90% reduction in the fuel consumed in transporting trailers across southwestern Ontario by railroad instead of having individual tractors hauling them between Detroit and the GTA. The potential may very well exist to reduce emissions from the Detroit-GTA freight vehicles by 90% as well.

Rather than rely on historical narrative, the DEIS should quantitatively assess the potential for intermodal transport of truck trailers between Detroit (and points inland from Detroit) and the GTA.

14. <u>Public Transportation Options</u>

I have nothing to add to this section of my 29 April 2008 submission, other than to point out that, apparently as the result of trade agreements between the US and Canada, the number of "Windsor Census Metropolitan Area" residents working in the USA more than doubled between 1991 and 2001, from 2,545 to 6,975). [TDF, page 26]. If all of these residents travel during one peak hour each weekday morning and vice versa each weekday afternoon and are in autos occupied only by the commuter as the driver, they alone would account for more than two lanes of traffic capacity. Accordingly, public transportation is indeed one part of strategy that constitutes a reasonable alternative to the DRIC project.

29 May 2008 Page 5 of 5

15. Low-Cost Reasonable Alternatives

I have nothing to add to this section of my 29 April 2008 submission.

16. DEIS Technical Reports

I have nothing to add to this section of my 29 April 2008 submission.

Respectfully submitted,

Dietrich R. Bergmann

Dietrich R. Bergmann, PhD, PE



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

GET INVOLVED!

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

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TELL US WHAT YOU THINK.

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

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

Can we have the same underso	use (lo lunes)
On the Detroit SIDE 116 CCine	Eda showich
In their presentation today?	<u>,</u>



May 27, 2008

Mr. Robert Parsons Michigan Department of Transportation 425 W. Ottawa St. P.O. Box 30050 Lansing, Michigan, U.S. 48909

RE: Comments on Draft Environmental Impact Statement for the DRIC

Dear Mr. Parsons:

I am writing to provide comments on the Draft Environmental Impact Statement (DEIS) for the Detroit River International Crossing. As you are likely aware, I feel the process has not been inclusive of the entire Southwest Detroit area that would be impacted by the DRIC if built. While there was outreach conducted for the citizens of Delray-the "area of continued analysis" as defined in the DRIC process-most of the citizens north of I-75 were unaware of the process until it was in full gear. I know that no meeting notices were distributed to my neighbors and others in the larger Southwest Detroit area until early 2007. This was unfair and also served to disenfranchise these citizens. While there were meeting notices posted in libraries, newspapers, and other media outlets, and mailings to "about 10,000 interested parties", this is wholly insufficient for a project of this scope. Additionally, to place blame on MDOT's "community partners" is entirely unfair to the nonprofits in this area when MDOT's budget for the entire project is so enormous. Not only were residents uninformed, but businesses, churches, and other commercial property owners were left out of the process even though their properties are in the area that could be taken for either a new plaza or new freeway entrances/exits. I feel this has been done deliberately and is an environmental justice issue. The Final EIS must detail the rationale for why very minimal if any outreach north of I-75 was conducted by MDOT until too late.

Southwest Detroit is the only growing region of the City of Detroit and in recent years has experienced significant investment in housing, businesses and recreational facilities. Southwest Detroit is considered one of the premier models of community development in the state, with two of its neighborhoods designated "Cool Cities Neighborhoods" by Governor Granholm. Unfortunately, this community also has endured a disproportionate burden of Southeast Michigan's transportation and industrial uses, including several major freeways, three international border crossings, the state's only oil refinery, the region's wastewater treatment plant, an intermodal freight yard and other railroad infrastructure.

To propose of this type and scope and claim air quality will improve is preposterous. I understand that there have been technological improvements to diesel engines and the

Environmental Protection Agency (EPA) is strengthening air quality standards, but to bring more trucks into this area that already suffers from outrageously high asthma rates in children and other diseases in adults and children cannot have a positive outcome. There cannot be enough factories close due to the DRIC to offset the increase in pollution from the diesel trucks another bridge would bring in to the neighborhood. Additionally, the Marathon Oil Co.'s refinery expansion was announced and approved during the DRIC process. The air quality modeling and analysis must be revised to include this project, and be realistic in terms of traffic projections and amount of pollution caused by the projected increases, not only of trucks but passenger vehicles as well, and be conducted by independent air quality experts in no way affiliated with MDOT, the Corradino Group, or otherwise connected to the DRIC process. Additionally, adequate air quality monitoring stations must be created and monitored, and diesel reduction devices and tactics must be employed throughout the area, particularly in and around local schools. A detailed air quality analysis and mitigation plan must be included in the Final EIS.

The DEIS' claim that there will be "no negative indirect and cumulative cultural resources impacts" is false as stable residential communities, historic districts, parks, churches, health clinics, and other institutions (including historic Fort Wayne), in addition to the business community, will be negatively affected by a new bridge in this area. Southwest Detroit proudly boasts the most viable neighborhood commercial district in the entire city of Detroit, primarily along W. Vernor Highway. However, businesses throughout Southwest Detroit are already currently suffering due to the Gateway project's shutting down I-75. Soon after that project would be complete, we would likely experience a similarly massive construction site if the DRIC is implemented and a new bridge were built. Closing exits and entrances from Clark, Livernois and Springwells would continue the devastation initiated by the Gateway project and is completely unacceptable. The proposed plaza area must not affect the Clark and Springwells intersections, and must protect the cohesiveness of the area by preserving as many streets and pedestrian crossings spanning the freeway as is deemed satisfactory to the residents of the entire Southwest Detroit area and the business community's customers who utilize them daily. Furthermore, the new Public Safety Center on Fort Street relies on easy access to I-75 and to the community to provide the services to protect the residents from crime and fire. This cannot be negatively affected by street closures, whether temporary during construction or permanent.

Another requirement of the Final EIS is to include a Community Benefits Agreement (CBA) and call for a process to work with the CBA coalition that has been created in the community. The CBA could include, but should not be limited to, implementing the Delray Neighborhood Land Use Plan, the building of new housing and commercial developments, no decrease in air quality, additional green space, jobs provided to Southwest Detroit residents and corresponding job training. There should also be a fund established for accomplishing these development activities, as well as for residents to tap into for health related needs and other issues that arise due to the new border crossing. Lastly, any new border crossing must have public ownership.

Sincerely,

Victor L. Abla

TO: MDOT Mr. Bob Parsons

FAA

28 May 2008

BY FAX

The following letter dated 23 October 2007 which was addressed by the Corradino Group were never in fact addressed by MDOT, as such my letter presents *serious concerns which* MDOT never addressed, in closing it is my view point now that the DRIC study in light of statement to redo NAFTC should be terminated *or* at the very least people in the target area receive compensation for the delays in the past and in addition receive payment from the state such that many of us can leave this area as the City Of Detroit has stated that the area is already been condemn and therefore worthless as a direct action caused by MDOT and this study and its delays which I point out were not caused by the vast majority of the people in the area or by any of member of the Corradino Group or Parsons.

- a Turos.

Steve A. Toth

07:18

TO:Mr. Mohammed S. Alghurabi Senior Project Manager DRIC
P. O. BOX 30050
Lansing Michigan 48909

FAX

23 October 2007

Mr. Alghurabi:

I am sure that you are well aware that I have been involved in this project from day one, as such you are also well aware that I do not write letters unless I have deep concerns about an issue, within the context of that statement I feel that at this point in time as this project enters into its seventh year that I must express the my deep frustration in the current state that this project is in.

This letter should not view by you or any member of the DRIC working group as an attempt to lay blame or as support of any other competing project, but to be blunt DRIC has over this period of time the people of this area have been what amounts to be "tethered goat" unable to make key discussion with regards to our property and how and when DRIC will or will not move forward with the taking of homes and property in the target area, I point out that the State Of Michigan need not as stated under MCL as it relates to the taking of property pay for any maintaining of the property, as I read the law, in addition it has been said that the "State will pay for attorney's for the people affected by our(The State) taking of property" this is untrue and is not permitted by the MCR or MRPC.

The point of this letter is that DRIC is at odds with it own standards, the concerns are:

1)Detroit International Bridge Company

DRIC never made or attempted to incorporate them in this study, I will state for the record that I disapprove of may of the actions of the company in question <u>but</u> I also accept the fact that the company in question has a sizeable investment in this State and also accept the fact that company in question has a right to engage in action which it see fit to recovery cost and investment in the structure, in addition based upon DRIC own study the need to "twin" the bridge is needed, the exist structure is at the end of it useful life, further was never designed to carry the loads it now must carry, there is room for two bridges.

Page 2

2)The Target Area

DRIC has in the pass seven years engaged in plans which were outside the scope of its over all mandate, these actions were driven by a small vocal group of residents which were not within the view of most of the residents, this delayed and added cost to the planning of the project unnecessary, I have expressed these concerns before, in addition I have been told by a highly reliable source that when she asked at the meeting in July(going over the way the State takes home for project of this type) if the bridge is <u>not</u> built then what?, she was told that "we(MDOT) are still going to take the homes, bridge or no bridge", this brings forth serious concerns about a number of issues, what are the plans of the State?

3) The Partnership

DRIC is alleged to be a multinational partnership, yet it appears that Windsor and OMT are to be blunt "calling the shots", there is at least to my view point what amounts to a dictatorship were Windsor demands a "made in Windsor solution" to the border problems and then after a report is issued rejects it, engages in *questionable conduct* with regards to the Ambassador Bridge in attempt to drive it out of business, compromise is "one way", MDOT it would also appear is a junior partner with little or no say in what is or what is not acceptable and also all compromises are always on our side of the border.

4)The Original Study

The first study done <u>clearly</u> stated that the only viable area was what was called the central corridor which was the area north of Rouge River to the just north of the Ambassador Bridge, yet this study was thrown away, reject and stated all over again, with the new study coming to the same conclusion, again driven not by any fault in the study but by people who had there own motivation on both sides of the river.

In closing my support for this project and the way in which it is dragging on is in question.

Steve A. Toth

CC/Joseph C. Corrdaino

05/28/08 07:18 FAX

Bob Parsons - DEIS Comment Form

From:	
To:	<pre><parsonsb@michigan.gov></parsonsb@michigan.gov></pre>
Date:	4/30/2008 12:03AM
Subject:	DEIS Comment Form

I do not object to the DRIC study and I feel that thus far, MDOT and the other parties involved have been informative, cooperative and couteous to those of us attending public meetings and seeking information on this process. However, I am concerned that if this project goes forward, we will be assured of this continuation of community involvement in regard for the people who will be impacted the most _ those who will have to be relocated as well as those left in the "Host" community of Delray. I am a member of the Community Bennifits Agreement Coalition and support the vision statement and the formal commenets this group has submitted. I would like to go on record as opposing Alternative #5 because of the direct impact on the Chass Clinic.

Sincerely,

Debra A Williams

Be a better friend, newshound, and know-it-all with Yahoo! Mobile. Try it now.

Bob Parsons - Good News for Future Bridge Crossing...

Robert Parsons:

First, I want to thank you for taking the time to read this. I can only imagine how busy you must be. I, therefore, will keep my comments short and upbeat.

My cottage in Canada causes me to travel the Ambassador Bridge every weekend. Also, over the last 40 years, I have made a lot of Canadian friends who travel the bridge quite regularly (mostly to attain US medical treatment, but that is another discussion). Anyway, we all agree that the downriver location is, by far, the most logical location for a future bridge. I have always felt this way, but never found the media to agree.

Traffic is very heavy on the bridge itself, but also unbearable on Huron Church Road. The crossing area which happens to align with EC Row is the perfect choice. You're killing two birds with one stone (traffic wise), and extracting a lot of Ohio visitors off of I-75 well before Detroit. There is less property attainment necessary downriver, and the Delray area needs the boost of development, too.

The Canadian side, too, benefits from out-of-town traffic routing, faster access to the 401, and less congestion on Huron Church, which will surely breakdown soon. Of course, the rural area south of old Sandwich is wide open and easy to procure, too. Please consider making the Downriver location the final choice.

Thank you, from me and my Canadian friends.

Chris Klosterman



April 28, 2008

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

Dear Mr. Parsons,

As a life long resident, organizer and activist of Southwest Detroit, I am applaud at the way you have taken another section of Southwest Detroit to add to your collection of future developments. It is always the area where the people can't fight for themselves due to their language barrier and knowing that they are struggling for survival.

When are you going to do something right for a change? After reviewing the Draft Environmental Impact Statement and Draft Section 4(f) evaluation for the Detroit River International Crossing Study it needs to be redrafted because people who live there need to read it in their own language which means, Spanish, English, Arabic and other languages.

One important factor is that you need to understand their culture and need. As professionals you have not taken that into consideration. You are there to let everyone know that you might need his or her properties. Well, how would you feel if you were in their shoes. I want you to take some time in thinking about the people of Southwest Detroit especially in Delray.

Now for the Section 4(f) Evaluation of historic properties. As I understand, section 4(f) is a law that requires the Federal Highway Administration to avoid harm to historic properties unless there is no other prudent and feasible alternative. I can go on and on regarding this issue but I want you to go tell people who live in these historic buildings that they can't live there no more because you might need their property. Remember, these are people who are struggling to stay alive by living in their own environment. This is their home with their families and they want to stay there.

Robert H. Parsons April 28, 2008 Page 2

All in all, we respectfully ask that the agencies provide the community and businesses with, at the very least, substantive summaries of the community impact portions of the DEIS translated into the different languages that make up that area of Southwest Detroit and give them sufficient time to review and comment on the information.

Sincerely Malin

Celia Rendon

Cc: David Williams, Environmental Program Manager David Wresinski, Administrator - Project Planning Division Sen. Debbie Stabenow Sen. Carl Levin Congresswoman Carolyn Cheeks Kilpatrick

DECENICA

The Detroit River International Border Crossing DRAFT ENVIRONMENTAL IMPACT STATEMENT Comment Form

The Michigan Department of Transportation (MDOT) is sponsoring the Detroit River International Corridor (DRIC) Study in southeastern Michigan. The purpose of the DRIC Study is 1) to provide safe, efficient and secure movement of people and goods across the Canadian/US border on the Detroit River area to support the economies of Michigan, Ontario, Canada, and the US; and 2) to support the mobility needs of national and civil defense. Nine Practical Alternatives have been identified for a new Detroit River crossing, a plaza and a connection to I-75. This is your opportunity to comment on the Draft Environmental Impact Statement (DEIS), which provides background on the project and presents the impacts of the alternatives.

GET INVOLVED!

m:staff

Your comments are important and will become a matter of public record. A Final Environmental Impact Statement will be prepared after the close of the comment period April 29, 2008. The Final Environmental Impact Statement will summarize all comments received on the DEIS and respond to them, and will identify a Preferred Alternative.

* * * PLEASE PRINT CLEARLY * * *	
Name Blois Brank	
Address	
City / Zip	
Email	

TELL US WHAT YOU THINK.

We want to know what you think. Is there an issue we did not address? Everything you say about this project is important. Please use the space below and on the back. Turn your comment form in to available staff at the Public Hearing, or give your comments orally to the court recorder available in the room. If you wish, you may mail your comments or email them (see back of this sheet for more information).

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

GET INVOLVED!

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

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TELL US WHAT YOU THINK.

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

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

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Timothy Boscarino

DE GEIVET MAR 2 5 2008

Mr. Mohammed Alghurabi Senior Project Manager Michigan Department of Transportation Murray Van Wagoner Transporation Building Lansing, MI 48909

Dear Mr. Alghurabi:

I am writing to advocate the opening of the Detroit-Windsor border to bicyclists.

Ever since the Detroit-Windsor Truck Ferry was closed to bicyclists in 2006, there has been no way to cross the border on bicycle. Any policy which increases the difficulty of crossing this border impedes the economic growth of both Michigan and Ontario.

Enabling bicyclists to cross the border would enhance the quality of life for Detroit and Windsor residents, as well as make our region more attractive to tourists from other areas.

Sincerely,

Timothy Boscarino

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

GET INVOLVED!

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

* * * PLEASE PRINT CLEARLY * * * Your name will be held confidential
Name TERRY KENNEDY
Address
City / ZIP
Email
How did you learn of this meeting? (Check One) Newspaper Mailer Word of mouth Radio Television Other

TELL US WHAT YOU THINK.

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

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

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TERRY & BETTY SCHMITT MAR 25 Dear Mr. Mohammed S. alghurabi, I am writing this letter regarding the G. Project. I attended the Meeting on Decem and I was really impressed with the context Gateway December 12, 2007 project. In regards to the property in the area of the project, I would like you to consider my property (address above) houses are being taken right up to our house. and Terry & myself are in a hardship and need to be considered health due to our we to move to Warner an failing , back of is 71 our health to our house the isotthe service drive at the of the Rouge ramp Rive Bridge This area use to be beautiful but now it has gone down we could have gotten at 80 to now I'm asking 50.000 but thousand. (moving Cast. Write Flease consider and If we could or will be considered your project in - I remain Letty Schmitt received at the meeting." STATE OF MICHIGAN DEPARTMENT OF TRANSPORTATION BUREAU OF TRANSPORTATION PLANNING MOHAMMED S. ALGHURABI, P.E. SENIOR PROJECT MANAGER PHONE: (517) 373-7674 AN WAGONER BUILDING PAGER: (517) 228-9023 425 W. OTTAWA FAX: (517) 373-9255

April 28, 2008



Dear Mr. Parsons,

The following are my comments regarding the Detroit River International Crossing:

I am most concerned about air quality:

Additional traffic in the bridge area from both the DRIC and the Gateway Project can only add more pollution. The two huge projects are so near one another, I am concerned that there seems to be no coordination between the two.

A 160 acre truck plaza, a full quarter section of land, enough for an entire farm, can only be an enormous source of pollution from idling diesel trucks, a kind of "point source". I understand that they don't turn off their engines. At the least we should expect best available technology to reduce pollution from idling trucks. And whatever other means of mitigation there might be. In this geographical area, the only acceptable change in air quality is one for the better, any project that makes our pollution worse is really not acceptable, maybe not even legal.

I am concerned about the continuity and viability of the neighborhood. I understand that we will lose 2 or 3 cross streets and 2 or 4 of only 5 foot bridges over I-75 if this project goes through. We need to keep continuity.

I am concerned about increased traffic on the freeways and the loss of use for commuters, and for our continuity with the downriver suburbs. Personally I already find myself forgoing alot of trips down I-75, for shopping, doctor's appointments and meetings. And it's not like there are other better alternatives elsewhere, I just don't do them.

Fort Wayne is an asset in the neighborhood. It is a historical site, a prehistorical site, containing our only remaining Indian burial mound, and it is important in many personal histories as the shipping out point of military draftees. It is also one of very few green access points to the River. It is woefully under-appreciated and misused. We need to keep good and attractive access to the site and not throw away still unclaimed opportunities for public good.

It's my preference, if there is a bridge, that it not be ostentatious in style.

I received information prompting my comments from a community person. Although I have attended some meetings on the bridge, I did not receive anything soliciting my comments.

When I went to Bowen Branch library today, I did not find the DREIS, nor was the reference librarian able to provide me with one, therefore, I believe the comment period should be extended.

My intention is to send this message both via e-mail and by post. I would like a message to let me know my comments have been received.

Thank you for your work,

Sincerely, Ruth Hart

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

GET INVOLVED!

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

PLEASE PRINT CLEAF	LY * * * Your name will be held confidential
Name MARY ANA	CUDERHAN
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How did you learn of this meetin	g? (Check One) I Newspaper Mailer Word of mouth

TELL US WHAT YOU THINK.

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

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

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Additional Comments:

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If possible, please return this before you leave. If not, please mail it to: Bob Parsons, Public Hearings Officer Bureau of Transportation Planning Michigan Department of Transportation P.O. Box 30050 Lensing, MI 48909 Fex: (517) 873-9255

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

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APR-21-2008 04:13 PM CUDERMAN

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

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TELL US WHAT YOU THINK.

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

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Additional Comments:

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If possible, please return this before you leave. If not, please mail it to: Bob Parsons, Public Hearings Officer Bureau of Transportation Planning Michigan Department of Transportation P.O. Box 30050 Lansing, MI 48909 Fax: (517) 373-9255

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

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The Detroit River International Border Crossing DRAFT ENVIRONMENTAL IMPACT STATEMENT Comment Form

The Michigan Department of Transportation (MDOT) is sponsoring the Detroit River International Corridor (DRIC) Study in southeastern Michigan. The purpose of the DRIC Study is 1) to provide safe, efficient and secure movement of people and goods across the Canadian/US border on the Detroit River area to support the economies of Michigan, Ontario, Canada, and the US; and 2) to support the mobility needs of national and civil defense. Nine Practical Alternatives have been identified for a new Detroit River crossing, a plaza and a connection to I-75. This is your opportunity to comment on the Draft Environmental Impact Statement (DEIS), which provides background on the project and presents the impacts of the alternatives.

GET INVOLVED!

Your comments are important and will become a matter of public record. A Final Environmental Impact Statement will be prepared after the close of the comment period April 29, 2008. The Final Environmental Impact Statement will summarize all comments received on the DEIS and respond to them, and will identify a Preferred Alternative.

* * * PLEASE PRINT CLEARLY * * *



TELL US WHAT YOU THINK.

We want to know what you think. Is there an issue we did not address? Everything you say about this project is important. Please use the space below and on the back. Turn your comment form in to available staff at the Public Hearing, or give your comments orally to the court recorder available in the room. If you wish, you may mail your comments or email them (see back of this sheet for more information).

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Additional Comments

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Comments must be e-mailed, faxed or postmarked on or before April 29, 2008.

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

Robert H. Parsons, Public Involvement and Hearings Officer Bureau of Transportation Planning Michigan Department of Transportation P.O. Box 30050 Lansing, MI 48909 Fax: (517) 373-9255 Email parsonsb@michigan.gov

For more information visit our Web site at www.partnershipborderstudy.com

From:"Bill Muir" mainTo:AlghurabiM@michigan.govDate:5/5/2008 10:16:31AMSubject:FW: 'Our intention is to build this bridge'

Mohammed: I see by this article from the Widsor Star that the comment period has been extended by 30 days; that means you will be taking comments until near the end of May.

The article goes on to say the the recommend crossing [the crossing agreed upon by the U.S. and Canada (X10a, X10b or X11)] will be announced in late June. So, does this mean that there will be an additional comment period on this decision during July and August? How can the public comment on the DRIC "plan" if they do not know where the bridge will be build? Also, there are many plaza and I-75 interchange alternatives in the DRIC DEIS but no recommendation as to which one will be chosen.

I know this is becasue Canada is behind on their timetable and that they just announced their road solution. But, they did not pick a crossing either.

When does the public get to comment on the final DRIC "choice/configuration?"

Thanks,

Bill

From: Gregg M. Ward [1999] Sent: Saturday, May 03, 2008 7:02 AM To: greened for the state of the

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Saturday > May 3 > 2008

'Our intention is to build this bridge' Transport Canada says DRIC's plans to proceed despite Ambassador Bridge

Dave Battagello The Windsor Star

Friday, May 02, 2008

A view of the Canadian side of the border and the Ambassador Bridge taken from an Albatross aircraft recently.<http://a123.g.akamai.net/f/123/12465/1d/media.canada.com/ff204 c0a-f375-4bc5-91b0-f6cc14acdaa1/2-bridgemay22008.jpg?size=1> CREDIT: Scott Webster, The Windsor Star A view of the Canadian side of the border and the Ambassador Bridge taken from an Albatross aircraft recently.

WINDSOR -- While debate rages over the best way to link the 401 to a new downriver bridge, operators of the Ambassador Bridge say just leave the lucrative business in their hands.

Traffic numbers have declined so drastically, there is no need for new lanes across the Detroit River -- other than their own six-lane twin span proposal, they say.

The 79-year-old bridge's "enhancement project" is in the midst of the environmental assessment process, competing with the binational government Detroit River International Crossing process to build the next Windsor-Detroit bridge.

"(DRIC) started off by saying we would be at capacity by 2012," said Skip McMahon, spokesman for the bridge. "But this isn't the same world.

"It's time to take a step back about building a new bridge across the water. It's not necessary. There is not enough traffic to support two new bridges. It's straightforward. It's been our position from day one."

In reality, the bridge's truck traffic volumes over the past several years have remained either stable or have varied by a small percentage, according to stats from U.S. Department of Transportation.

Sean O'Dell of Transport Canada said during Thursday's DRIC announcement for its Windsor-Essex Parkway that DRIC is marching forward with its plans to build a new bridge. A location will be somewhere off Ojibway Parkway.

"The DRIC process was done on assumption the Ambassador Bridge would continue to offer four lanes of service and we were looking to add six to that," he said.

"If we go ahead with ours and they subsequently replace their existing bridge, we go from four to 12 lanes. I don't think that is an excessive amount for long-term growth that we will probably see for the next 40, 50 to 60-year period.

"Our intention is to build this bridge."

DRIC was originally scheduled to announce its preferred plaza and bridge locations during Thursday's announcement on its final preferred feeder road options, but that part was postponed to accommodate a request by the team's partners on the U.S. side.

DRIC members from the Michigan Department of Transportation (MDOT) and the Federal Highway Administration (FHWA) announced this week they have extended the public comment period by 30 days for the Draft Environmental Impact Statement (DEIS) for the planned new bridge. The comment period will now end May 29. The extension will give agencies, public and community groups more time to submit comments, they said.

"We believe an additional 30 days of review will be beneficial to assure everyone has a chance to provide input," said state transportation director Kirk T. Steudle in a statement.

"Both MDOT and the FHWA appreciate the importance of this international border crossing to the economies of the United States and Canada."

It is expected a final preferred location for plazas and the new bridge will be announced in late June by DRIC.

O'Dell said bridge construction will start at the same time as the feeder road in Windsor, targeted to begin at the end of 2009. It is anticipated it will be completed by 2013.

Meanwhile, Ambassador Bridge officials applauded the DRIC plan for the new six-lane feeder road highway in the Huron Church Road-Talbot Road corridor, but quickly added the need to bring the new highway right up to the foot of their bridge. The DRIC route swings west at E.C. Row Expressway, towards the DRIC bridge.

"As far as road design it eliminates traffic lights on Huron Church Road and separates international traffic from local," McMahon said. "That is a positive step, no question about it.

"We are all in favour of that, but the bottom line is it finishes a mile and a half from the foot of the bridge.

"It seems silly they are not willing to talk about the final (stretch) to the foot of the bridge. That's what we are waiting to talk about."

(c) The Windsor Star 2008

CC:

From: To: Date:	<pre></pre> <pre></pre> <pre> </pre> <pre> <pre> <pr< th=""></pr<></pre></pre>
	Re: Summary - DRIC Study DEIS Public Hearings, March 18-19, 2008
Just a note o	n the DRIC DEIS:
The DEIS prov	ides the link as http://www.borderpartnershipstudy.com

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The correct link is http://www.partnershipborderstudy.com

Sherry A. Kamke Environmental Scientist NEPA Implementation (Mailcode: E-19J) Office of Enforcement and Compliance Assurance U.S. EPA Region 5 77 W. Jackson Blvd. Chicago, Illinois 60604-3590 Phone:

CC:



DLeonard writing.

At last month's LAC meeting, a truck driver talked about the routes truckers will actually take disregarding posted routes. How does one respond? What happens to those communities? As I recall, Mr. Corradino indicated he would take a second look at closing Clark. Please, also take a second look at Waterman's proposed closure. Should something occur on the plaza, bridge, the children will have only east or west Fort Street to escape. Has this closure been discussed with the DPS safety division?



April 29, 2008

Mr. Robert H. Parsons Public Involvement and Hearings Officer Bureau of Transportation Planning Michigan Department of Transportation P.O. Box 30050 Lansing, MI 48909 Email <u>parsonsb@michigan.gov</u>

DEIS COMMENTS - Detroit River International Crossing (DRIC)

Since May 2005, I have been a member of the DRIC Local Advisory Council (LAC) sitting as a member of the Sierra Club and the National Environmental Justice Committee. The following comments, while they espouse many of the EJ principles, are mine. Consistently, I have stated that I am opposed to the building of a bridge knowing that a bridge will be built whether it is built through the joint efforts of the DRIC or an expansion of the existing Ambassador Bridge Company. Having read the data that projects increased truck traffic, the economic concerns of manufacturers in the area, the close proximity to the water and knowing that the city of Detroit has designated Sector Five as "The Transportation Hub", I recognize the inevitable. I also recognize that the lives of some are not the concern of many when it comes to economics.

There are several major concerns that I have addressed throughout my involvement with this project – 1) Southwestern High School, 2) the community, 3) truck traffic, 4) air quality and 5) environmental justice.

Southwestern High School (SWHS)

The Southwestern High School student population, while diverse, is primarily a classic environmental justice population – low income and people of color. The historical presentation and discussion of SWHS in the DEIS is informative. However, it does not tell the human side of the school. It does mention that the school serviced various populations throughout its history since being built in 1915 and originally named the Nordstrum School. It does not say schools and churches are the "glue" that hold communities together. SWHS is the only remaining public school remaining in the DeIray community. It services students from the South Schaefer area over to the closed Chadsey High School area at Martin and Livernois and heads further east to service students.

The school is surrounded by heavy and light industry. Years ago, its football field, which was located at Waterman Street and Fort Street, was sold to a company that wanted to locate in the area, Arvin Meritor. The land was sold; football field moved behind the school and now abuts the railroad track. While Crossings X-10 and X-11 will impact the school, Crossing X-10 will impact the most as the plaza will abut the school.

During presentations to the LAC, "fly-overs" have been mentioned and that the schematic was available on one of the CDs provided with the DEIS materials. I have viewed both CDs but did not recognize something to be a "fly-over". What I imagine a "fly-over" to be is an elevated section of the expressway that is proposed to be circular coming across Fort Street and will either advance in front or on the side of the school. Further clarification is needed here.

In a number of conversations with now retired SWHS principal Robert Hodge, concerns were expressed about the quality of air currently within and outside the building and should the DRIC be approved, the school should be air conditioned. A great number of the students suffer from asthma. It is my understanding a health clinic was scheduled to be situated within the school this past fall. In discussing the possibility of higher education after high school, this student population generally scores GPA 2.0 or below. Most colleges require at least a GPA 2.75. There are numerous studies, Batterman, et al, that have been provided the project director, Mr. Mohammed Alghurabi, that reflect the negative impact of diesel fumes on student learning and health.

SWHS sits on Fort Street, a major street, and is located south a short half block from 175. It is located in a non-attainment area. There is an air monitor that sits on the property (261630015) but because of reduced federal government funding it will only measure PM 2.5, PM 10, SO2, metals will be reduced, VOCs, and Carbonyls. It does not measure O3, CO or NO2.

The current DRIC proposed nine practical alternatives will each impact this student population. Waterman Street, which is on the south side of the school, is proposed to close for five of the alternatives. Should the school administration need to evacuate the building due to an emergency, the Waterman crossing over the I75 expressway is needed; otherwise, the students and staff will only be able to evacuate the building heading east or west on Fort Street.

<u>Community</u>

Closing streets that cross over the 175 expressway or reducing the lanes on remaining cross overs will impact the community on both sides of Fort Street. The community on the north side of Fort Street will experience additional truck traffic. If more trucks will be required to use a longer service drive because of closed streets, diesel fumes will filter into the communities whereas previously the trucks were not idling above but on 175 when there were backups. Additionally, the DEIS suggests barriers may not be feasible in all situations; that additional streets would need to be cut off because in order for barriers to be effective they should go across the entire street.

Approximately 15-20 sites are eligible for the National Register of Historic Places. A number of these sites are churches which sit in the Build plans area. Rather than demolish these buildings, if all involved would consent, these buildings could be moved to the Fort Wayne area which has been touted as being beefed up as a tourist attraction. The loss of churches is devastating to any community. They would bring additional tourist interest.

Truck Traffic
Additional truck traffic and additional pollution will be a concern for the South Schaefer neighborhood. As expressway traffic backs up on 175, truckers will seek the quickest route to enter or exit off 175 to 194 or 175 and will use Jefferson Avenue in River Rouge down to South Schaefer. Additional truck traffic on South Schaefer will cause even more deterioration of the concrete. South Schaefer is a Wayne County road that is always in disrepair.

During one of the LAC meetings, a trucker expressed concerns about the proposed rerouting of trucks and stated in all probability routes truckers will take. Please reference this previous public comment.

<u>Air Quality</u>

A <u>Reuters</u> report on April 16, 2008, states that President George W. Bush is calling for a greenhouse gas emission halt by year 2025. The United States is considered one of the biggest creators of carbon dioxide emissions. As stated earlier in this document, Southwest Detroit is located in a nonattainable area.

An article appearing in the Detroit Free Press, April 24, 2008, page 6A, "EPA Scientists Say Politics Interferes" indicates that scientist are pressured to "skew" their findings by their superiors and politicians. In a survey returned by 60% of the solicited scientists, they indicated they had experienced situations where politics interfered with their findings being published as written. So, to say PM10 is the standard or that PM 2.5 is the standard or that the government has yet to define the standard is questionable. Meanwhile, citizens' health is being compromised.

Placing a plaza that abuts Southwestern High School where trucks will be idling or where additional truck traffic will be in the area in no way can be considered to "not have a disproportionately high and adverse effect on minority population groups in the Delray Study area." This appears to be a canned and patented statement for permit requests.

Environmental Justice

"The proposed alternatives will not have a disproportionately high and adverse effect on minority population groups in the Delray Study area." (DEIS, ES-18) This is a preposterous statement. The key word is *disproportionately* which requires a comparison of something to something. *The Community Inventory Technical Report* presents Community Neighborhood Characteristics for specific Southwest Detroit neighborhoods and cities of Allen Park, Dearborn (south), Ecorse, Melvindale and River Rouge but it does not compare socio-economic data with Delray nor its most likely impacted neighborhoods with the outer metropolitan Detroit area as well as the Wayne County cities not surveyed. Even with the five Wayne County cities reviewed, data are not presented as a comparison to the immediate impacted Southwest Detroit neighborhoods.

This DEIS does not project additional health risks to citizens residing in these proposed impacted Southwest Detroit neighborhoods. A health survey should be conducted prior to and throughout the operation of such a project which will have a disproportionately high and adverse effect on minority population groups remaining in the area. Additionally, because most Southwest Detroit neighborhoods fall under the guidelines of EJ, the residents are the least likely to have health care insurance and already are suffering from existing pollution emitted by the surrounding industrial sites. Asthma, heart disease, cancer and other respiratory illnesses are the result of or exacerbated by living in such an environment.

On November 16, 2007, during a Southeast Michigan Council of Governments (SEMCOG) Task Force on Air Quality presentation, Environmental Protection Agency (EPA) data were presented indicating proposed revisions of the ozone National Ambient Air Quality Standards (NAAQS). The data indicated the morbidity rates (the proportion of sickness within a group or a locality) decreased when the ozone levels decreased. Data were presented that indicated the lifespan of an individual could be increased appreciably. The lower the ozone rate, the longer individuals lived.

Governor Jennifer Granholm signed into law Executive Directive No. 2007-23 on November 21, 2007.

The Department of Environmental Quality is currently developing a working group to establish guidelines. Hopefully these guidelines will be finalized and included in a final approval document for a

project such as this. There have been too many instances where permits have been given to such projects, private and public, with total disregard for the environmental justice (EJ) population.

Conclusion

Where do low-income, disenfranchised people go when their homes are taken by eminent domain? Many persons living in the Delray neighborhood are a part of the Empowerment Zone which permits them to be exempt from paying the city of Detroit property taxes for 12 years. Renters pay a very low monthly rental fee. In the DEIS, The Community Inventory Technical Report, Community Neighborhood Characteristics referenced some homes in the Delray neighborhood can be purchased as a fixerupper for as little as \$15,000. Once removed from their Delray neighborhood, how will these people survive if they will now be required to pay higher utilities, property taxes and possibly a mortgage albeit at a low interest rate? When comparing the residents of this neighborhood to others where the residents were relocated as a result of urban renewal, there is the likelihood they will be worse off should their current homes be demolished. If they were financially able, many residents probably would have left the area long before this project was being considered. Education and income are key to survival. Did the DEIS consider both factors in its Community Neighborhood Characteristics? The DEIS does not present socio-economic data that discusses or compares the survivability of a population of displaced persons. It is suggested such a study be conducted. It is also suggested that the Toxic Wastes and Race at 20: 1987-2007 be retrieved via Google and reviewed. It is an Environmental Justice report that addresses many of the concerns that face the EJ populations that will be impacted by this project.

The Build Alternative is projected to relocate 324-414 <u>households</u> (This equates to how many people? How many of these are senior citizens? How many are students who attend Southwestern High School?), relocate 685-920 jobs from the Delray area. How many persons within this area are required to use public transportation? The rerouting of bus lines as well as closing pedestrian crossings over I75 to Fort Street will cause grave

inconvenience for many. Relocation plans suggest these residents will be relocated within the city of Detroit and that the city will not lose additional tax base.

There are many socio-economic questions that have not been answered and need to be projected or resolved for residents where the least harm will be done. Personally, having experienced an urban renewal relocation, this is a very traumatic experience. Most seniors do not adjust well when moved from familiar surroundings. Students do not adjust easily when transferred to new schools. From a socio-economic perspective, the city of Detroit should not count on many of these residents relocating within its city limits.

DOLORES V. LEONARD, ED.D., NCC, LPC Member, National Sierra Club Member, National Environmental Justice Committee Member, Michigan Chapter Sierra Club

CC: Mr. M. Alghurabi, Project Director



29 April 2008

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

RE: Detoit River International Crossing (DRIC), Wayne County, Michigan "Draft Environmental Impact Statement and Draft Section 4(f) Evaluation" -- approved by Federal Highway Administration on 15 February 2008

Dear Mr. Parsons:

This letter consists of comments submitted for the record regarding the Draft Environmental Impact Statement identified above.

1. <u>Abbreviations and their Definitions</u>

For convenience, several abbreviations are used through the text of this letter. Facility name abbreviations are as follows:

AMB	the Ambassador Bridge, which is a privately-owned four-lane highway between Detroit and Windsor that opened for traffic in 1929
BWB	the Blue Water Bridge, which is a pair of two adjoining three-lane highway bridges over the St. Clair River between Port Huron, Michigan and Point Edward and Sarnia, Ontario, and which is owned by the governments of Michigan and Ontario. [The older of the two spans was opened for traffic in 1938. The newer of the two spans was opened for traffic in 1997.]
DRT	the Detroit River Tunnel, which is a two-tube railroad tunnel (one railroad track per tube), which opened for railroad traffic in 1909, and which is owned by the Detroit River Tunnel Company (a Michigan corporation)
DWT	Detroit-Windsor Tunnel, which is a two-lane highway tunnel between Detroit and Windsor that opened for traffic in 1930 and that is owned jointly by the Cities of Detroit and Windsor

Abbreviations for organization names, report titles, and other terminology are as follows:

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CEQ	Council on Environmental Quality, a unit of the Office of the President of the United States
DEIS	the Draft Environmental Impact Statement identified immediately before the salutation above
SEMCOG	the "Southeast Michigan Council of Governments", which is a regional planning organization whose planning jurisdiction consists of the following Michigan counties (listed in declining order of population): Wayne (which includes the City of Detroit), Oakland, Macomb, Washtenaw, Livingston, St. Clair, and Monroe
Local traffic	motor vehicle traffic which has both its origin and destination within the area consisting of Essex County in Ontario and all SEMCOG counties, except for St. Clair County
Long distance traffic	motor vehicle traffic which is not "Local traffic" as defined above
Borealis	Borealis Transportation Infrastructure Trust, a Canadian entity which is controlled by the Ontario Municipal Employees Retirement System and which in 2001 purchased from the Canadian National Railroad that railroad's 50 percent interest in the Detroit River Tunnel Company
DRTP	the Detroit River Tunnel Partnership, which appears to be an assumed name for the Detroit River Tunnel Company and which reportedly is co-owned by Borealis and the Canadian Pacific Railway
DIBC	Detroit International Bridge Company, the private organization that owns AMB
DCTC	Detroit & Canada Tunnel Corporation, the entity which is under contract to operate the DWT on behalf of DWT's owners
TDF	a working paper report entitled "Detroit River International Crossing Study Travel Demand Forecasts", prepared September 2005 by IBI Group http://www.partnershipborderstudy.com/pdf/TTRexisting&future2005-09-15.pdf
PCEs	"Passenger car equivalents", which is calculated in the DEIS by determining the sum of the following for a specific period of time (e.g., an hour, a day or a year): the observed or predicted passenger car vehicle traffic volume and 3 times the observed or predicted commercial vehicle traffic volume [For example, if during any given hour the traffic flow consists of 100 automobiles and 50 commercial vehicles, the PCE value for that hour is 250.]

To:	Mr. Robert Parsons,	MDOT	Public	Involvement/Hearing	g Officer
Re:	DRIC DEIS				-

2. Introduction

The DEIS is a very detailed review of several highway options for building a new truck/automobile bridge over the Detroit River at locations between the existing Ambassador Bridge and the southern tip of Grosse Ile Township, Michigan, as viewed from the US side of the border.

However, the viewpoint expressed immediately above should not be interpreted to imply that the DEIS complies with CEQ requirements for an Environmental Impact Statement as set forth in 40 CFR 1502. [ref: <u>http://ecfr.gpoaccess.gov</u>]

The balance of this letter provides elaboration on some of the ways the DEIS should be modified in order to properly respond to CEQ regulations.

3. <u>Context of the DEIS</u>

The context of this DEIS is twofold. First there is an overriding policy context. In addition there is a factual context.

3a. Policy Context:

There are at least three dimensions within the policy context: CEQ requirements; the President's agreement with the Prime Minister of Canada as stated on 21 August 2007; and the US government requirement that any new international border crossing requires a Presidential Permit before it can be constructed.

The first of the three dimensions in the policy context, the CEQ requirements result from the mandate set by Congress in establishing the CEQ. The origin and responsibilities of the CEQ are perhaps best described by quoting from the CEQ website, http://www.whitehouse.gov/ceq/aboutceq.html

Congress established CEQ within the Executive Office of the President as part of the National Environmental Policy Act of 1969 (NEPA). Additional responsibilities were provided by the Environmental Quality Improvement Act of 1970.

In enacting NEPA, Congress recognized that nearly all federal activities affect the environment in some way and mandated that before federal agencies make decisions, they must consider the effects of their actions on the quality of the human environment. NEPA assigns CEQ the task of ensuring that federal agencies meet their obligations under the Act. The challenge of harmonizing our economic, environmental and social aspirations has put NEPA at the forefront of our nation's efforts to protect the environment.

Some of the essential provisions of the CEQ requirements for an environmental impact statement establishing the policy context for preparation of the document are as follows:

<u>40 CFR 1502.1:</u> ...an environmental impact statement...shall provide full and fair discussion of significant environmental impacts and shall inform decisionmakers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment.

<u>40 CFR 1502.2(a):</u> Environmental impact statements shall be analytic, rather than encyclopedic.

<u>40 CFR 1502.2(g)</u>: Environmental impact statements shall serve as the means of assessing the environmental impact of proposed agency actions, rather than justifying decisions already made.

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<u>40 CFR 1502.14:</u> ...agencies shall...(a) Rigorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated.

<u>40 CFR 1502.14:</u> ...agencies shall...(c) Include reasonable alternatives not within the jurisdiction of the lead agency.

<u>40 CFR 1502.9:</u> If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion.

<u>40 CFR 1502.9:</u> The agency shall make every effort to disclose and discuss at appropriate points in the draft statement all major points of view on the environmental impacts of the alternatives including the proposed action.

The second aspect of the policy context is the President's 21 August 2007 statement. The relevant parts of that statement are reproduced immediately below. Note that the statement does not commit the US and Canadian governments to any particular mode of transportation. Also, note that the statement does not commit the government to any specific type of action for "enhanced capacity", such as building a new crossing in lieu of enhancing border processing procedures. Presumably the Michigan Department of Transportation's \$230,000,000 Ambassador Bridge Gateway Project which began during February 2008 qualifies as a "development of enhanced capacity" anticipated in the 21 August 2007 Joint Statement.



THE WHITE HOUSE PRESIDENT GEORCE W. BUSH

CLICK HERE TO PRINT

For Immediate Release Office of the Press Secretary August 21, 2007

Joint Statement by Prime Minister Harper, President Bush, and President Calderón

Montebello, Quebec, Canada

Smart and Secure Borders

Our three countries have a long history of cooperative border management, predicated on the understanding that our prosperity and security depend on borders that operate efficiently and effectively under all circumstances....

We ask ministers to continue to pursue measures to facilitate the safe and secure movement of trade and travellers across our borders and, in particular, to:

• ...

 Canada and the US will maintain a high priority on the development of enhanced capacity of the border crossing infrastructure in the Detroit-Windsor region, the world's busiest land crossing.

•••

The third and final aspect of the policy context is that if any "development of enhanced capacity" of the border crossing infrastructure involves the construction of a new bridge or tunnel across

the border, then a Presidential Permit is required. The US Department of State processes applications for Presidential Permits for new bridge and tunnel crossings. A summary of the procedure for obtaining the permit is presented on a US Department of State webpage, <u>http://www.state.gov/p/wha/rls/fs/7895.htm</u>.

Environmental reviews prepared pursuant to the CEQ requirements are an integral part of the approval process for a Presidential Permit. Thus it appears reasonable that the DEIS should help the President to decide the type and timing of any new transborder infrastructure installation.

3b. Factual context:

The factual context of the DEIS is that regrettably it is but one of three environmental statements which have been, are, or will be prepared for three proposed international crossing projects.

The second environmental statement is an Environmental Assessment dated April 2007 which the DIBC submitted to the US Coast Guard with regard to its proposal for a second suspension span to be located immediately downstream of AMB. That document is available for review at http://www.ambassadorbridge.com/drafts/ Draft Environmental Assessment.pdf

The third is a forthcoming environmental statement for a DRTP proposal to replace the existing two-track DRT with a one-track railroad tunnel with a cross-sectional dimensions greater than those of each of the two existing railroad capable of accommodating a large auto carrier railroad freight car referred to as an "Auto-Max" railcar and railroad freight cars that carry double stacks of larger containers. [Most auto carrier and many double-stack container railroad freight cars already are small enough to pass through the DRT.] DRTP's intention regarding the existing tunnel is stated by one of DRTP's two owners to include conversion of the existing tunnel to a truck-only highway. [See Section 4, below.]

Presumably an environmental statement will be required for each of the three Detroit River crossing proposals by the Canadian government in addition to the environmental statements required by the US Federal Highway Administration. Thus, a total of six environmental statements will have been prepared before the President and the Canada's Prime Minister make a decision as to which, if any, of the competing proposals will be implemented.

Unfortunately there simply is no way that the DEIS as it is constructed at this time can address the totality of environmental impacts of the three separate proposals. What is needed is for the US Secretary of Transportation and the Canadian Minister of Transport to jointly retain a qualified and impartial environmental impact evaluator who has no business relationship with any of the businesses and the Michigan and Ontario highway agencies involved in the competing proposals, in order to avoid the impression that the author of the environmental document is advocating a business or bureaucratic interest rather than the welfare of the public residing on both sides of the border.

In conclusion, the DEIS needs to be redone by the Office of the US Secretary of Transportation rather than by the Federal Highway Administration or another modal administration in order to objectively satisfy the CEQ requirements for a DEIS.

4. <u>The DEIS needs clarification as to what the DRTP proposes to do</u>

The DRTP proposal as of approximately 2005 included a provision to convert the existing twotrack DRT to a truck-only highway. The DEIS working paper entitled "Indirect and Cumulative Impact Analysis Technical Report" states in a footnote on page 4-68 [pdf p. 139] that "The DRTP Truck-only Tunnel proposal has been withdrawn by the proponents." Notwithstanding that statement, as of the morning of 28 April 2008 a Borealis webpage,

http://www.borealisinfrastructure.com/assets/transportation.aspx, stated the following:

Detroit River Rail Tunnel: OMERS jointly owns with Canadian Pacific Railway the 8,500-foot Detroit River Tunnel that links Windsor and Detroit. More than \$130 billion of goods flow annually through this cross-border asset. This trade is expected to triple in the next five years. Additionally, a \$600 million new rail tunnel and high-speed truck route are proposed for completion within five years to assure shippers fast and competitive routing on North America's busiest free-trade corridor. For more information, please visit <u>www.thejobstunnel.com</u>.

The www.thejobstunnel.com webpage reads "under construction".

Notwithstanding the assertion in the above-referenced DEIS working paper that the project sponsor has withdrawn the truck-only tunnel, the DEIS at page 3-191 refers to "...the construction of the Detroit River Tunnel Partnership proposed truck-only tunnel" and states that it would not "...measurably diminish the traffic on the proposed DRIC crossing..." and that it is not "...associated with a program to enhance the community which hosts the crossing."

During February 2008 DRTP requested that a replacement rail tunnel be added to the SEMCOG Regional Transportation Plan for 2030. The project listing has no information regarding the number of tracks in the replacement tunnel, although informal presentations indicate that the replacement tunnel will contain only one track. In addition, no information is provided in the SEMCOG Regional Transportation Plan project listing about the future use or disposition of the existing tunnel. The primary information in the SEMCOG project listing is that the total cost for the part of the project on the US side of the border will be \$172,785,000, that the entire cost will be privately provided, and that the time period for the expenditure is "2006-2010". [ref: http://www.semcog.org/Data/Apps/project.report.cfm?type=RTP&id=4425]

The problem described above can be cured if both of the two co-owners of the DRT submit for inclusion in the DEIS record a written statement clarifying their intentions regarding the disposition or alternate use of the existing two tubes comprising the existing DRT once the new one-track tunnel is constructed.

5. Rationale for Considering the BWB in the DEIS

The BWB is located approximately 60 miles from the AMB and the DWT. It is over the St. Clair River rather than the Detroit River. Nonetheless it is essentially a local international crossing between Detroit and Canada.

If one uses <u>www.mapquest.com</u> to check the driving distance between the Detroit City Hall (which is located at 2 Woodward Avenue, only three short blocks from the Detroit entrance to

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the DWT) and the Toronto city hall (located at 100 Queen Street West), one finds that the shortest route between the two city halls is via the DWT and Ontario Route 401. However if one makes the trip between the Detroit and Toronto city halls via the BWB and Ontario Route 402 to the point where that route intersects with Ontario Route 401 just west of London, one finds that the total travel distance is only 12.5 miles greater than the route using DWT [i.e., 243.6 miles vs. 231.06 miles]

Effectively there are places within the city limits of Detroit from which travel to London and Toronto involves a shorter trip distance and probably a shorter trip time than travel via either the DWT or the AMB.

This relevance in travel demand forecasting of the above-described geographical fact is discussed in greater detail on TDF pages 56-58 [pdf pp. 65-67]. With the exception of discussion and tables presented on DEIS pages 2-9 through 2-11, the local significance of the BWB for travel from Detroit to London and Toronto is not discussed in the DEIS.

The DEIS should be modified to conspicuously indicate that one reasonable alternative to building new bridges over the Detroit River at this time is to route more traffic over the BWB as long as the BWB has the ability to absorb more traffic. The authors of the TDF address that option in a sensitivity analysis summarized in Section 6.2.3 on page 124 [pdf p.133] of that report.

6. Existing and Projected Traffic on Detroit River Highway Crossings

The DEIS states on page 1-9 that as of 2004 the combined weekday traffic volume on the existing Detroit River border crossings, i.e., AMB+DWT, was as follows:

Automobile:	Total traffic Local traffic	35,850 28,450 (79% of total auto traffic)	
Truck traffic:	Total traffic Long distance traffic:	13,000 6,500 (50% of total truck traffic)	

On page 1-10 the DEIS states that the hourly combined capacity of AMB and DWT is 5,000 passenger car equivalents (PCEs) per hour, for which each truck is counted as three automobiles. The TDF explains [on pdf page #s 103 and 104] that the 5,000 PCE capacity estimate is for each direction of travel and that it is calculated by assuming the AMB and DWT capacities are 1,750 PCEs/lane and 1,500 PCEs/lane respectively. Because AMB has two lanes per direction of traffic and DWT has only one lane per direction of traffic, the total capacity for the two facilities combined is 5,000 PCEs/direction/hour.

The DEIS also states, on page 1-10, that the total traffic on AMB+DWT will reach the 5,000 PCE/hour capacity sometime between 2015 and 2035.

Although the TDF on page 55 [pdf p. 64] specifies the border crossing fees (apparently as of 2005) for ABM, DWT, and BWB, there appears to be no information in any of the DEIS documentation regarding the assumptions in the travel demand forecasting process of the border crossing fees for the years for which the traffic forecasts have been made.

Also, it appears from the DEIS that no consideration in the traffic forecasting was given to differential tolls based on any of the following options, which have been implemented in other major metropolitan areas, for example, the Golden Gate Bridge in San Francisco, CA [ref: http://goldengatebridge.org/tolls_traffic/toll_rates_carpools.php]:

- Time-of-day variation in bridge/tunnel tolls to discourage travel during peak hours
- Lower tolls for vehicles equipped for electronic toll collection
- Lower tolls for a high-occupancy vehicle (i.e., an automobile or SUV with more than one or two persons in it)

A review of the web sites for the AMB, DWT, and BWB indicates that as of 28 April 2008 the toll differs depending on which direction the facility user is traveling for at least DWT and BWB. It also indicates that a discount is given by the operators of all three facilities for the purchase of commuter tokens or tickets. In other words, the facility usage fee policy of each facility operator gives discounts to travelers who tend to travel at peak travel times, a policy that runs counter to the view that transportation facility users who contribute to congestion should pay a greater fee than those who travel at times of no congestion.

Given the absence in the DEIS of an analysis of the sensitivity of peak period travel forecasts to increases in facility user fees during peak travel hours or to user fee decreases during off-peak travel hours, it is not possible to determine how realistic the peak hour travel forecasts contained in the DEIS and its supporting documentation are.

The DEIS should be amended to clarify the traffic forecasting assumptions and to quantitatively evaluate at least the fare policy options identified above.

7. Change in Forecast Base Year from 2004 to 2007 and Revision of Forecast for 2034

The travel demand forecasts presented in the DEIS and the TDF use 2004 as a base year. We now have three more years of data and the DEIS should be amended to establish 2007 as the base year.

Traffic volumes on at least the BWB declined considerably between the end of 2004 and the end of 2007.

The declines in traffic volumes for the BWB have been...

from 3,760,000 in 2004 to 3,423,000 in 2007 for automobiles, and from 1,800,000 in 2004 to 1,623,000 in 2007 for commercial vehicles.

Presumably similar declines in AMB and DWT traffic volumes also have taken place.

The TDF report presents estimates of the compound annual growth rates (CAGR) in traffic volumes across AMB, DWT, and BWB taken together for the period 2004 to 2015. Exhibit 5-7 on page 83 [pdf p.92] estimates the CAGR for automobile traffic to be 2.9%. Exhibit 5-18 on page 95 [pdf p. 104]indicates that the CAGR for commercial vehicle traffic to be 3.3%. Doing the math leads to the conclusion that the actual BWB auto and commercial vehicle traffic volumes during 2007 were respectively 23% and 25% less than what was forecasted for 2007.

The DEIS should be modified to present the traffic counts for the AMB, DWT, BWB and amend the forecast for the planning horizon year, 2034.

8. Modification of Forecasts to Reflect Changes in Fuel Prices Since 2004

The Energy Information Administration (EIA) maintains statistics at <u>www.eia.doe.gov</u> regarding gasoline and diesel fuel prices for various locations around the country.

EIA statistics for the US "Midwest (PADD-2)" show that the prices per gallon, including taxes, for "Gasoline All Grades – Conventional Areas" and "Diesel (On-Highway) – All Types" were as follows:

Date	<u>Gasoline</u>	<u>Diesel</u>
Average for 2004	\$1.831	\$1.770
Average for April 2008	\$3.434	\$4.040

The increases in gasoline and diesel fuel prices are extraordinary, being 88% and 128% respectively.

Because significant fuel price changes have an impact on travel demand the travel demand forecasts contained in the DEIS should be redone. In addition, the changes in fuel prices since 2004 give impetus to identify within an amendment to the DEIS the improvement of intermodal freight services as a reasonable alternative to constructing a new highway crossing of the Detroit River.

9. Evaluation of Peak Period Travel for AMB, DWT, and BWB as a Group during 2034

Assumptions regarding the tendency for traffic to move all at once are critical in reaching conclusions regarding the need for additional highway capacity between Detroit and Canada.

Figure 1-3 on page 1-10 of the DEIS illustrates that the peak hourly PCE traffic during 2004 was approximately **3,300 PCE**s.

TDF devotes an entire section entitled "Temporal Patterns of Vehicular Travel" (Section 3.6 on pages 43 to 51 [pdf pp. 52-60]) to observed peak period travel patterns in years 2000 and 2004.

Exhibit 5-23 on ETF page 101 [pdf p.110] states that the traffic volumes were as follows:

AMB + DWT:	11,950,000 passenger cars
	3,530,000 commercial vehicles

Applying the relationship between traffic volume and PCE's as established in the DEIS and repeated above, one may conclude that during 2004 the total PCE's for AMB+DWT was 22,540,000.

Exhibit 5-23 on ETF page 101 [pdf p. 110] also includes travel demand forecasts for year 2035. Those forecasts are as follows:

AMB + DWT:	18,740,000 passenger cars 8,060,000 commercial vehicles
BWB:	5,910,000 passenger cars 4,290,000 commercial vehicles

If one applies the procedure specified in the DEIS for calculating PCEs, one finds that the 2034 forecasts summarized above imply that the total PCE's during that year is forecasted to be 61,700,000 [i.e., 18,740,000 + 3(8,060,000) + 5,910,000 + 3(4,290,000)].

As noted above during 2004 we had 3,300 peak hour PCEs for a total AMB+DWT traffic that year of 22,540,000 PCEs. The ratio between annual PCEs and peak hour PCEs that year was therefore **6,830**.

The DEIS and its supporting documentation do not specify the ratio between annual PCEs and peak hour PCEs for year 2034 for AMB, DWT, and BWB taken together. However, as a preliminary assumption we can assume that the ratio will be same in 2034 as it was 2004, i.e., **6,830**. Doing that leads us to conclude that the peak hour PCEs in 2034 will be **9,034** (i.e., 61,700,000 divided by 6,830).

As noted above, the combined capacity of AMB and DWT is 5,000 peak hour PCEs per direction. Assuming that each lane of BWB has the same capacity as each lane of AMB, i.e., 1,750 PCEs per hour, the three lanes per direction at BWB add a total of 5,250 peak hour PCEs per direction of travel, giving us a combined capacity of 10,250 peak hour PCEs.

For AMB, DWT, and BWB taken together, the year 2034 peak hour PCEs projection derived above [i.e., 9,034 PCEs] is slightly less than 90% of the available capacity in place at this time, a result which suggests the need for providing more highway capacity across the Detroit River is not as urgent as is suggested in Figure S-2 on page ES-2 of the DEIS.

The DEIS should be revised to explicitly state how the peak period PCE statistic was derived from the year 2034 travel demand forecast and the justification for the procedure that was adopted.

10. Sensitivity of Peak Hour Travel Demand to Changes in Assumptions Made in Its Calculation; Peak Period Travel Disincentives; Evaluation of Reversible Lanes

Figure S-2 in the DEIS, prominently shown on page ES-2, indicates that the hourly PCE during 2004 was approximately 3,300. The temporal pattern of vehicular travel is addressed in the TDF on pages 43 through 51 [pdf pp. 52-60]. The TDF on page 51 [pdf p.60], lines 9-11, states that "the change in travel characteristics between 2000 and 2004 indicates a change in the peak hour from a Summer afternoon weekday to a Fall afternoon weekday, although the differences are not large." [p 51 [pdf p.60], lines 9-11] PCEs.

Figure S-2 also shows that the hourly "Base Forecast Volume" will be 6,000 PSEs in year 2034.

However, neither the DEIS nor the TDF contains an analysis of the sensitivity of the hourly PCE for 2034 to changes in assumptions made in the calculations. The DEIS should be amended to address this issue.

As indicated in Section 6 above, it is possible to provide incentives to travel at times other than peak periods. The DEIS also should be amended to address the sensitivity of the peak hour travel forecasts to the implementation of various peak period travel disincentives.

Lastly, it appears from the discussion on TDF pages 43 through 51 [pdf pp.52-60] that between now and 2034 there will be a date beyond which the directional imbalance in traffic flow will be sufficiently large to make feasible the operation of lanes on which the permitted traffic flow is reversible depending usually on the time of day and day of week. For example, if an existing or new highway crossing the Detroit River has four lanes, at some times of day three of the lanes could be used for one direction of travel and the remaining one lane could be used for vehicles traveling in the opposite direction. BWB already has six travel lanes. For BWB normally three lanes are available for each direction of travel. However, during periods of imbalanced peak traffic flow the arrangement could be changed to provide four lanes for the peak flow direction. The DEIS should be amended to define and evaluate this option to avoid providing more capacity than is required.

11. Michigan – Upstate New York Origin-Destination Statistics and Projections

Many Michigan motorists traveling to Upstate New York and New England travel across Canada because the travel time to do that is shorter than to drive into Ohio and then along the south shoreline of Lake Erie. The DEIS includes no information about US traffic using Ontario as a short-cut to avoid driving around Lake Erie. The absence of that data makes it impossible to ascertain whether there is a practical alternative for accommodating such traffic that does not require adding capacity to the international crossings in metro Detroit.

The DEIS requires amendment to clearly present both existing and forecasted travel volumes between Detroit and Upstate New York that uses travel through Ontario as a short cut.

12. US-Canada Travel Origin-Destination Statistics and Projections

The Michigan Department of Transportation, the agency apparently managing the preparation of the DEIS on behalf of the Federal Highway Administration, has not included, either within the DEIS document or in any of the supporting documents, any travel origin-destination data for either "local traffic" or "long distance traffic" between the US and Canada. SEMCOG officials have referred my inquiry for "long distance traffic" data to the Ontario Ministry of Transport.. I advised the Michigan Department of Transportation of that referral and was not offered a local source for the data. I then contacted the Ontario Ministry of Transport which in turn advised that the data available at this time are only from a 1999 survey. The Ontario Ministry of Transport also stated that it has statistics as the result of a 2005 survey done in cooperation with US Federal Highway Administration and Transport Canada, but that it cannot yet share the data until a pending data sharing agreement is executed by the parties.

I have requested the 1999 data but have not yet received them. I therefore request from you an opportunity to supplement these comments after I receive and review the 1999 data. I also

request an opportunity to supplement these comments a second time, after receiving and reviewing the 2005 data.

Given the non-availability of the 2005 data, and given that practical alternatives to the DRIC project can not be evaluated without such data, it is imperative that the DEIS be amended to include the 2005 origin-destination information and then released to the public for additional comment.

13. Intermodal Rail Diversion of Truck Traffic

The TDF on pages 122 and 123 [pdf pp.131-132] addresses the possibility that intermodal rail services could divert a significant amount of truck traffic.

The topic takes up only about 1.2 pages of text and one exhibit.

Perhaps the most notable point included in the discussion is the statement that "the commercial vehicle traffic...potentially divertible to rail represents approximately 44% of the current total truck volumes on the Ambassador Bridge."

The TDF on page 101 [pdf p.110] states that during 2004 a total of 3,370,000 commercial vehicles traveled over AMB. That statistic implies an average truck traffic volume between Detroit and Toronto of over 4,000 per day (both directions combined) or 2,000 per direction per day.

There already are intermodal rail services between southeast Michigan and southern Ontario. Apparently no public funds have been allocated to assist the railroads involved in those services to further develop and to expand the services.

One intermodal service, CP's Expressway, was established approximately in 2000. The TDF on page 122 [pdf p.131] incorrectly states the following about intermodal rail services in general as the result of the termination of that service: "The potential is also brought into question given the recent cancellation of the CP Xpressway intermodal rail service in 2004."

The reason the sentence quoted in the immediately preceding sentence is incorrect is that, according to a Canadian Pacific spokesman on 29 April 2008, the CP Expressway service continues to operate between Montreal and Toronto. The CP merely truncated the western portion of the service. It is not clear whether the truncation of the route was due to a need to reallocate scarce resources to the Montreal-Toronto segment because of great demand there, or if the incremental revenues from operating the service between Toronto and Detroit did not exceed the incremental costs of operating that segment.

Railway Age Magazine's January 2003 issue carried an article about the CP Rail Expressway service, and in that article stated that CP invested \$50,000,000 in equipment to start up the service, which operated between Detroit, Toronto, and Montreal Given that the DEIS suggests that \$2.5 to \$3.0 billion would be invested to complete a new highway crossing over the Detroit River, it appears inappropriate to deem questionable an intermodal service that requires an

investment of less than two percent of the investment required for a new Detroit River highway crossing without examining ways to make such a service successful.

A second intermodal service between metropolitan Detroit and Toronto is operated by Triple Crown Service, a subsidiary of Norfolk Southern Railway. That service has been operating for many years, involves one train run per direction on each of five days per week, and for each train run takes approximately 80 to 100 trucks off not only the international highway crossing that otherwise would be used, but also the freeway between the border and Toronto. Air pollution emissions from the locomotive drawing the train reportedly are not more than 25% of the air pollution emissions that would be emitted by the highway tractors that otherwise would operate between Michigan and the terminal in Toronto.

There have been and continue to be other intermodal services between Toronto and Michigan.

In any event, given the statement quoted above that 44% of the truck traffic crossing AMB as of 2004 is potentially divertible to rail, and given the fact that 40 CFR 1502.1 requires that "...an environmental impact statement...shall provide full and fair discussion of significant environmental impacts and shall inform decisionmakers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment⁷, it is imperative that the intermodal rail option be addressed, even though the rail intermodal service alternative is not within the jurisdiction of the lead agency in this case [ref: 40 CFR 1502.14]

14. <u>Public Transportation Options</u>

In Section 6, which is on page 7 of this letter, the magnitudes of weekday "Local traffic" and "Long distance traffic" are presented for automobile and truck traffic on AMB+DWT combined. The data there shows that automobile traffic that is "local traffic" accounted for 38% of the total daily PCEs. Probably "local traffic" accounted for by automobiles during the daily peak travel hour accounts for an even greater percentage of the peak travel hour PCEs accounted for by trucks and autos.

Given the fact that the State of Michigan and the Province of Ontario are considering what is essentially a \$2.5 to \$3.0 billion investment in a new highway crossing of the border, it appears that a reasonable alternative to the highway investment option could be an international public transportation service that would attract the automobile "local traffic" which now impedes the operation of trucks on AMB.

One option is to extend the planned Woodward Avenue light rail line southward to Oullette Avenue in Windsor, and then out Oullette and perhaps out two or three branches from Oullette. Such an extension probably could be done for a cost much less than the estimated cost of the proposed highway bridge structure over the Detroit River. The option therefore is a reasonable alternative and, according to CEQ requirements, needs to be the topic of detailed evaluation in the DEIS.

The evaluation envisioned would require for both 2004 and 2034 daily and peak-hour origindestination data for trans-border automobile travel. It also would require the definition of a public transportation service on both sides of the border and the estimation of how much of the automobile travel could be diverted to the public transportation mode.

The DEIS therefore should be amended to do the requisite analysis of the public transportation alternative. If the origin-destination data do not exist, they will have to be developed in order to analyze the alternative.

15. Low-Cost Reasonable Alternatives

There are a number of options that do not involve the expenditure of millions or billions of dollars in order to achieve what President Bush, Prime Minister Harper, and President Calderon described on 21 August 2007 as "...the development of enhanced capacity of the border crossing infrastructure in the Detroit-Windsor region".

15a. Pricing Policies:

Already discussed above are several bridge and tunnel pricing policies that provide incentives to travel either before or after the facilities' peak travel hours and/or to travel in high-occupancy vehicles such as car pools or van pools.

Another pricing policy that could alleviate congestion is, at the time of the next fare increase, is to defer increasing the facility use fee for those who acquire NEXUS identification documents and therefore are eligible for expedited customs and immigration processing on each side of the border.

One of the most unfortunate pricing policies in effect at this time is the policy of selling commuter tickets at reduced prices and not requiring that the reduced-price tickets be used only during off peak hours.

15b. Marketing of the Blue Water Bridge:

A second option is to entice the drivers of trucks and autos to use the BWB instead of AMB or DWT. On page 124 [pdf p.133] of the TDF, in a section entitled "High Diversion to St. Clair River Crossing Scenario", the authors of the TDF state that there is a bias among travelers to use either AMB or DWT instead of the BWB, when all other factors are equal. The authors of the TDF go on to assert that if that bias were removed the need for additional Detroit River crossings would be deferred by six years.

Most likely trans-border travelers between Michigan and London and points east of London are not aware that the total trip length increases by approximately 12 miles when one end of the trip is in Detroit at the entrance to AMB or DWT and the other end of the trip is in London or east of London, and when the travel between the two locations is via BWB instead of via AMB or DWT.

A public education program is appropriate in order to effect a reduction in congestion at AMB and DWT. This can consist of one or more of at least of the following:

- Distribution (perhaps at Michigan and Ontario travel centers) of BWB brochures which announce the absence of a major travel time disadvantage for cross-border travelers destined to metro Detroit and to London and places east of London
- In Michigan, static signs along northbound I75 at points south of I75 milepost 45 (approximately) and also along eastbound I94, I96, and I69, to announce the advantages of using BWB rather than other crossings.
- In Ontario, static signs located along westbound Highway 401, east of the Highway 402 interchange, to announce the advantages of using BWB to travel to Detroit
- Variable message signs installed in advance of route choice decision points, rest stops, and service centers to announce, for each of the existing border crossings, the estimated time to travel from the sign's location to downtown Detroit and/or other major destinations and whether that time estimate is expected to increase or decrease during the next hour or two. [Having the information before reaching the border could entice travelers to stop and rest or eat before reaching the border if delays at the border will diminish during the rest stop.]

15c Set up reversible lane programs:

If not already done, establish a reversible lane program for BWB and possibly AMB to take advantage of a major imbalance in directional traffic flows. This program could even extend to DWT during the hours immediately before and after major events in downtown Detroit. If necessary, during this occasions use of the DWT could be limited to individuals with NEXUS identification.

16. DEIS Technical Reports

The "Foreword" to the DEIS lists a number of technical reports as being included in the documentary record of the DEIS. Not included in that list is the TDF report which is identified on page 2 of this letter and which is referenced in DEIS Figures S-2 and 1-3. The record of working documents that are a part of the DEIS should be amended to include the TDF report.

Respectfully submitted,

Dietrich R. Bergmann

Dietrich R. Bergmann, PhD, PE

From: Deb Sumner To: parsonsb@michigan.gov Cc: mohammed alghurabi ; karen kavanaugh ; steve tobocman ; Lisa Nuszkowski ; rashida tliab ; joe corradino Sent: Sunday, April 27, 2008 10:59 AM Subject: DRIC - Draft EIS Community Statements

Dear Mr. Bob Parsons and Other DRIC Lead Representatives,

I am a concerned life long resident and community advocate of Southwest Detroit, property homeowner in the Hubbard Farms Historic District and long time volunteer for the Clark Park Coalition.

While I believe the voices of residents and business directly impacted by the proposed development of a new international border crossing and the plaza should be those that are directly located within the Delray Study Area. However, the decision of the DRIC Study narrowing down the alternatives for the direct traffic routes into the I-75 freeway system and around the Southwest Detroit neighborhood and business district community is of concern to a wider audience of voices.

The traffic route decisions must be chosen with careful consideration, be creative, methodical and deliberate with intense analysis of the selection of any new traffic routes built, created or modified to ensure the least amount of disruption occurs to our community. The crucial results achieved must be to preserve the existing residential and business community located on the north side of the existing I-75 Freeway Service Drive as well as the south side and to the east and west.

The historic residential neighborhood and business community located in the shadows of the existing Ambassador Bridge Crossing have long waited for over 30 years to realize the "relief" of bridge related truck traffic with the MDOT Gateway Project and it's direct connects into the I-75 Freeway to and from the border plaza and improved traffic routes. All along, the community's goal has been to preserve the existing neighborhood housing stock and businesses but to get and keep truck traffic off of the neighborhood streets.

It would be counterproductive for the DRIC traffic routes to be created, built or modified where traffic routes would directly or indirectly effect the landscape all the way to the east, to Clark St. or even Junction. Route Alternatives should not cause increased truck traffic patterns to utilize Clark Street from the north or south of I-75. The Southwest Detroit Police and Fire Station is located on W. Fort St. near Clark St. and these safety services utilize the easy on & off ramps in both directions of I-75 at Clark St. and these access ramps must not be removed.

Based on my years of working with the businesses on Springwells and West Vernor it would also be counterproductive to their livelihood and growth to disrupt the I-75 easy on and off ramps to access the Springwells Business District that is also a main artery to the West Vernor Business District.

Any portion of the Clark St. interchanges and Springwells interchanges must not and should not be eliminated. The traffic and structural engineers need to seriously go back to the drawing board and rework the bridge plaza's direct connect traffic routes into the I-75 Freeway so they are "confined to the area of Livernois and Dragoon, modifying and improving those area ramps to move traffic to and from the new plaza." The goal for Livernois and Dragoon to the north needs to result in no truck traffic on these two residential streets that can be achieved via proper signage and enforcement. Preserving all the residential, small businesses, churches and schools including historic structures to the north of the I-75 Freeway should be another key goal as well as throughout the entire study area.

Also, how can there be a feasible way to utilize, modify and improve the Dearborn Ave. ramp of I-75 to the west of the proposed plaza and to move bridge related traffic on and off the I-75 freeway so it is as far west from the majority of the Southwest Detroit community's population. Such traffic movement to the most western part of the I-75 Freeway could be achieved on elevated roadways so as to not disrupt useful and productive structures in the Delray community.

Our Canadian partners listened to the voices of their people and are studying tunneling part and/or all of their direct bridge traffic routes to connect to their 401 Highway however, even though the voices on this side of the border have asked for this same approach to be studied, it has been dismissed. Our Southwest Community deserves the best not the cheapest approach to mitigate traffic impacts to our area as the proposed new bridge traffic is tied into I-75 without disrupting Clark, Junction and Springwells.

The construction of another bridge crossing over our international waterway will have a far reaching visual impact to our area's landscape that effects our entire community, our Detroit River with Heritage River Designation, our neighboring country and the region. Based on the historic landscape of our Detroit River, that hosts the historic Ambassador Bridge and the Belle Isle Bridge, the most appropriate new bridge design needs to be the selection of the a Suspension Bridge design.

Sincerely,

Deb Sumner

Public Comment Service - Responses by Respondent

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Do you represent an organization or agency? If yes, please provide organization or agency name in box.	Yes	g, 2	Yes
Please provide your comments here. You may attach a file as well	(Free Text) The Detroit Windsor Tunnel (Tunnel) continues as one of the busiest border crossings between the United States and Canada serving in excess of 6 million passenger and commercial vehicles annually. The Tunnel accommodates approximately 3 percent of the regional Windsor-Detroit commercial traffic. The passenger traffic primarily consists of commuters going to and from work, including thousands of nurses and other medical professionals. a€ ^c The Tunnel is the downtown-to-downtown conduit with access to the major U.S. and Canadian freeway systems as well as the direct route to many of our region's cultural attractions and sports and entertainment venues on both sides of the border. The Detroit Windsor Tunnel remains a critical access point to both the United States and Canada and is a leading driver to the success of both economies. a€ ^c The Detroit Windsor Tunnel has served the region for over 77 years without government support. It remains important that DRIC continue to view the tunnel as an integral part of our region's international transportation system and keep in mind that until a new crossing is open to traffic, the bridge and tunnel share provide the redundancy in our region. a€ ^c The Detroit Windsor Tunnel, L.L.C. is not advocating a position. We continue to support the allocation of greater resources to make our border more secure and efficient.		Yes
	Please feel free to contact Neal Belitsky, 313-567-4422, with any questions.		
Name of organization or agency	(Free Text) Detroit Windsor Tunnel, L.L.C.		Yes
Would you like to be added to our mailing list to receive updates and notification of upcoming meetings? Please make sure your correct U.S. Mail and/or E-mail addresses are provided.	Yes		Yes
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Name of organization or agency:	(Free Text) Community Health and Social Services Center, Inc. aka CHASS		Yes
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Do you represent an organization or agency? If yes, please provide organization or agency name in box.	Yes		Yes
Please provide your comments here. You may attach a file as well.	(Free Text) Please, provide a new crossing, and start building it, we cannot allow the Ambassador Bridge Company to construct a twin for health and other reasons. A third, state of the art crossing is required for redundancy and safety issues. I live under the current bridge operation and can tell you that the Ambassador Bridge Company has caused harm to our		Yes

Name of organization or agency:

(Free Text). SandwichTowne Ontario Canada resident...

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Question	Response	Category	May we publish you comment?
Do you represent an organization or agency? If yes, please provide organization or agency name in box.	Yes		Yes
Please provide your comments here. You may attach a file as well.	(Free Text) The Detroit Regional Chamber recognizes the diligent work of the Michigan and Ontario governments in completion and execution of the Detroit River International Crossing (DRIC) Draft Environmental Impact Statements (DEIS) and the timely and thorough communication of their results.	graddig (fersionignal)e	Yes
	In 2004, the Canada-U.SMichigan-Ontario partnership identified a strategy to serve the long-term needs of the transportation network between Southeast Michigan and Southwest Ontario. This strategy necessitated a study to determine how to best serve and support our international corridor into the future. The study has provided a unique relationship between the U.S. and Canada to coordinate connected infrastructure and resolve congestion issues at a bi-national level. The DEIS is the first step to completing the study.		
	For the economic viability of our international region we must have an accurate understanding of the condition of the infrastructure supporting the busiest border crossing in the world and the gateway to the North American trade network. Continuation of the DRIC process is critically important to job providers throughout the Detroit region and along the U.S. / Canadian trade corridor. Thus far, both Michigan Department of Transportation and the Ontario Ministry of Transportation have effectively communicated their results. This is reflected in the numerous meetings with local, state and federal governments and a readily accessible online resource www.partnershipborderstudy.com		
	As part of a four year process, the DEIS is the first milestone in the conclusion of the overall study. Following this process, we encourage further timely completion of the Final Environmental Impact Statement (FEIS), determination of the preferred alternative and submission to both federal governments for the Record of Decision. We look forward to the conclusion of this process in 2008 to comply with the original intent and needs of the partnership.		
	Further inquiry into our respective positions, interested parties may contact Melissa Roy, Senior Director of Government Relations at the Detroit Regional Chamber shubbard@detroitchamber.com (313-596-0409)		
Name of organization or agency:	(Free Text) Detroit Regional Chamber		Yes
Would you like to be added to our mailing list to receive updates and notification of upcoming meetings? Please make sure your correct U.S. Mail and/or E-mail addresses are provided.	No		Yes

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Public Comment Service - Responses by Respondent

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	The Draft Environmental Impact Statement has been a great source of information for concerned residents of Southwest Detroit.	
	My suggestions and concerns -	
	1 - The Ambassador Bridge should not be expanded at its current location.	
	2 - Any new bridge should be publicly owed and operated.	
	3 - Keep the bridge west of Clark Park - safety concerns (3 schools and a park oftentimes filled with people enjoying their day)	
	4 - Preserve Fort Wayne, the new span should not destroy a historical treasure.	
	5 - Air quality standards/improvements should be a vital part of the overall design plan.	
	6 - Pedestrian crossing should be replaced, keeping the community clinic (CHASS Clinic) accessible.	
	7 - Respect our Canadian neighbors, place the bridge west of the Ambassador Bridge.	
	8 - It is inevitable that property will be taken under "eminent domain―. All displaced residents and businesses be properly compensated. No running roughshod over their rights to a fair settlement.	
	Alternative design # 4 would be my choice.	

Alan	White					Yes
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