

Detroit River International Crossing-Comments by Michigan Environmental Council

The Detroit River International Crossing Study is partnership that includes many agencies both State and Federal. It is understood that Michigan Department Transportation(MDOT) is acting as an agent for Federal Highway Administration to conduct many aspects of the DRIC study including the project's Environmental Impact Statement(EIS) required under NEPA. In the EIS, all environmental impacts of the project must be considered including to the extent that they affect public health. Although the draft Environmental Impact Statement will not be completed till later this year, the Michigan Environmental Council feels that it is important for MDOT and FHWA to consider the concerns of the council before drafting the EIS for this project.

The Michigan Environmental Council(MEC), in regards to the DRIC project, is interested in protecting the health, wellness and economic viability of the communities of Southwest Detroit, in particular we share in the concerns of the community located in 48217. Specifically these are these are the concerns of MEC with the DRIC process in its current stage of analysis: 1)Location of the proposed bridge plaza next to Southwestern high school 2)Air Quality analysis for the project 3)Combination truck traffic of DIFT + DRIC 4)Health analysis 5)Environmental Justice analysis 6)Public/private contention 7)Environmental mitigation options.

On the Southwest side of Detroit, 1 in 5 children has asthma. A 2002 report by MDCH showed "asthma hospitalizations for children in Detroit to be three times the statewide average." In addition, while hospitalizations for asthma for the rest of the state remain stable, Detroit continues to rise(MDCH 1997). There are thousands of studies nationwide that link environmental emissions including from trucks of PM 10 and PM 2.5 to asthma and other respiratory problems in children and adults. Among these studies are two that focus on the health situation of Detroit. These two studies done by the University of Michigan, focus on the very serious problem of diesel truck emissions and asthma attacks on the southwest side of Detroit. With over 3,486, 110 trucks/year(MDOT 2001), the Ambassador Bridge crossing is one of the busiest U.S-Canadian crossings. The studies by both Lewis et.al and Keeler et. al of Detroit children, highlight that the levels of pollution(i.e PM 10 and PM 2.5) on the southwest side are exceedingly high, above and beyond the $15\mu\text{g}/\text{m}^3$ NAAQS for PM 2.5. They noted that these increased outdoor levels of PM 10 and PM 2.5 cause increases in the indoors levels of pollution in schools and homes. This results in indoor levels of PM to be much higher than outdoor levels. The study by Lewis et al, linked these exposures to the adverse effects on pulmonary function for at-risk children with asthma in Southwest Detroit. These studies also highlight that the particular truck traffic around the Ambassador bridge border crossing contributed to a significant amount of the PM measured at the school on the southwest side of Detroit.

The School Governance and Leadership: Asthma Wellness 2003 report, reveals that "Asthma is the leading cause of school absenteeism due to a chronic illness, accounting

all policy and projects implemented by these agencies. Therefore it is a policy that MDOT must adhere to in the implementation of the DRIC study and process.

Michigan Environmental Council feels that the environmental justice analysis has not been taken seriously in neither the site selection process nor the analysis of the DRIC thus far. Southwest Detroit is a low-income community of color that already has the bulk of the pollution from industries on Zug Island and the surrounding area impacting its community. Further the children of this community already suffer from asthma rates that are the highest in the City of Detroit and in the state of Michigan, in particular asthma hospitalizations for African-American children are 3x that of white children as noted earlier.

Environmental Racism is a term referring to the unjust burden of environmental pollution being placed primarily in communities of color and the disregard of this burden based on race. The comparison site that was eliminated from consideration in Grosse Ile is a community that has virtually no industry, is high income and has very few people of color. In addition, the proposed site for the DRIC is adjacent to a school, primarily attended by children of color and low-income children, already located next to I-75 and faced with some of the highest drop out rates in the city. Why are the children that will potentially be exposed by this plaza not being considered in this process?

In a recent city planning document it was eluded to the idea that southwest Detroit was to be the potential transportation hub for Michigan to promote economic growth. We are also aware that projects such as the Detroit Intermodal Freight Terminal(DIFT) are also in the process of operating, posing the risk of a compounded point source of diesel truck emissions. While MDOT claims that DIFT and DRIC are entirely separate, it is difficult to understand that these MDOT projects could not be interconnected, especially in light of the city planning document. These projects together bring not only further exposure of increasing truck emissions to the residences, due to unreliable truck routes, but increase problems of safety, vibrations and road infrastructure issues. Most importantly there does not seem to be any proposed plan for protecting the community from the operation of two major truck projects within this already burden area.

FHWA has asserted that current “scientific uncertainty” does not allow for this agency to conduct a “health impact study”. However as discussed previously, there are thousands of studies that highlight the problem of diesel emissions in regards to health, and there are models, with some limitations that are available to model emissions. There is also good toxicological data that can point to the significant health risks from diesel PM and other Mobile Source Air Toxics(MSATs). Therefore, since the scientific data is available, why can a health impact analysis not be conducted with the available data?

In understanding that there are limitations to some of the available modeling, it is important to recognize the good scientific information that is available and utilizing it in the planning of these projects. Although these studies may appear as a way to stop “economic growth” it actually helps to sustain it. An area that becomes so heavily polluted does not stand a long lifetime of economic viability, in particular for the communities that live adjacent to this industry as is the example of the existing problem in southwest Detroit. We think that it is unfortunate that part of Southwest Detroit

5)300 meter buffer around the truck plaza-MSAT emissions are virtually non-existent at this distance

6)New hospitals/clinics in the area with the capacity to deal with serious asthma/respiratory issues.

7)Biodiesel or clean diesel policies or practices at truck plaza, technology to reduce diesel emissions in truck plaza. (working with MDEQ and other environmental consultants to implement some of this technology and practices into plans)

Roshani Deraniyagale-Dantas, Michigan Environmental Council

My name is Roshani Dantas, mother of 2, Toxicologist and Staff of the Michigan Environmental Council. On the Southwest side of Detroit, 1 in 5 children has asthma. A 2002 report by MDCH showed "asthma hospitalizations for children in Detroit to be three times the statewide average." In addition, while hospitalizations for asthma for the rest of the state remain stable, Detroit continues to rise (MDCH 1997). Michigan Environmental Council is concerned about several aspects of the DRIC process/study. While we do not support a privately owned bridge and know the current Ambassador bridge owner is not a good neighbor to the southwest community and know that public input in economic development projects is important, we also know that public agencies such as MDOT and FHWA have a responsibilities to the public since billions of tax dollars are and will be used for this bridge project. In particular we are concerned of the distance of the proposed truck plaza to Southwestern high school. MDEQ has air monitors set up in 5 places in the southwest region. One of those monitors is situated at Southwestern high school, the monitor shows that this monitor is in "non-attainment" status for PM 2.5. A large contributor to the PM 2.5 for this region has shown to come from mobile sources. There are too many studies linking exposure to diesel truck emissions to respiratory illness, asthma attacks and even death from asthma attacks for children. International Agency on Research Cancer recently listed PM2.5 as a possible Carcinogen in 2005. One School Wellness reports that asthma disrupts a child's learning process and performance in school as well as their health. African-American children are 3x more likely to be hospitalized for asthma than white children. The report also reveals that "Asthma is the leading cause of school absenteeism due to a chronic illness, accounting for more than **14 million missed school days** and educational opportunities/year". We are very concerned that the citing, analysis and health impacts of the DRIC study and any bridge expansion project place an undue burden on this low-income and community of color making this an environmental injustice. Studies are showing that the disproportionate cancer and non-cancer health effects of air toxics from mobile and point sources are disproportionately affecting communities of color and poor. We are urging MDOT to address these concerns with the community and consulting agents. We believe that it is imperative that a health analysis be conducted for this community so that appropriate mitigation steps be taken, if this plaza is to built, to protect the health of the community. There are models such as AERMOD/ and MOBILE 6.2 that can be used to do some type of analysis even with limitations-we also have Canada's best practices to use for analysis for these studies to protect our communities-why can these not be used when we legally are allowed to? The problem is MDEQ has no authority to regulate these large mobile source projects and so a large problem with regards to attainment status is created in the state if the acting agencies such as FHWA do not do these analyses. We believe that the viability of a community depends on both economics and health to create a healthy and wealthy community. If the techniques and money are available why can't we?

Therefore the Michigan Environmental Council believes that MDOT-FHWA should include the following in their analysis and possible mitigation practices with community consent:

- 1) Air Quality analysis equivalent to Canada-this demonstrates best available practices
- 2) *Health Assessment* of specific identified health issues of the community-to help plan for best mitigation of the DRIC and future projects that may arise in this community
- 3) Special meeting/forum with Parents, teachers, administrators of Southwestern high school and DPS school board to advise them of the proposed plaza location and the DRIC process.
- 4) Re-building a new Southwestern high school in a "Green Building" style and offering many improvements capacity wise to the school (*Pending community agreement and input on Re-building the school*)-with Indoor Air Quality improvements/plan
- 5) 300 meter buffer around the truck plaza-MSAT emissions are virtually non-existent at this distance
- 6) New hospitals/clinics in the area with the capacity to deal with serious asthma/respiratory issues.
- 7) Biodiesel or clean diesel policies or practices at truck plaza, technology to reduce diesel emissions in truck plaza. (working with MDEQ and other environmental consultants to implement some of this technology and practices into plans)