

From: [Syeda Arbab](#)
To: [Garneau, Allen M CIV](#)
Subject: [Non-DoD Source] Ambassador Bridge 2nd Private Span Permit
Date: Thursday, February 25, 2016 11:45:50 AM

Hello,

My name is Fiana Arbab and I am a resident of Wayne county. I am urging you to not make a decision regarding the permit unless the Bridge Company actually has approval from DNR to use the Riverside Park land. Additionally, I'm aware that there needs to be a full Environmental Impact Study (EIS) on the proposed second private span. Only after an EIS is conducted should the Coast Guard make a decision about the permit.

Some few important concerns about this issue:

- The Bridge Company does not have the land they need in Detroit to build a second private span. Millions of dollars from the Natural Resources Trust Fund and the Land and Water Conservation Fund have been spent over the past few decades to improve Riverside Park. In order for the portion of Riverside Park to be used to build a new bridge, the US National Park Service and Michigan Department of Natural Resources would need to approve the conversion of this land away from public outdoor recreation use.
 - The City and Bridge Company have not submitted any application for a land conversion.
 - The Department of Natural Resources says they are “not likely to approve the conversion of dedicated park land in exchange for a site that contains both a warehouse and a parking lot, because the warehouse site does not offer equivalent recreational value.”[\[1\]](#)

- The environmental assessment is incorrect because it is based on outdated data, wrong assumptions, and procedural errors. In addition, a long term transportation project of this magnitude and with close proximity to schools, parks and homes deserves a full Environmental Impact Study (EIS).
 - The environmental assessment is segmenting this border project to avoid doing a full Environmental Impact Study. There are other important components of this overall project, including Riverside Park construction and remediation, the new bridge, the Gateway Project, and all ten lanes of bridge traffic (rather than just six).
 - The environmental assessment uses outdated data. For example, the 2012 Air Quality addendum uses meteorological databases from 2001-2005 to determine air quality impact and the 2010 modeling results compared to the National Ambient Air Quality Standards (NAAQS) are based on a 2007 report.
 - The environmental assessment assumes a certain percentage of trucks are using new diesel engines (and therefore polluting less), but this is based on a national study, not localized data. A revised study is needed that should be based on actual data regarding the percentage of trucks crossing the Windsor-Detroit border that have new diesel engines.
 - The environmental assessment has major procedural shortfalls. As noted in the Michigan Department of Transportation’s public comment[\[2\]](#), the EPA has

recommended that the “MOVES2014 mobile source emissions model” be used “to develop updated mobile source emissions projections” [3] but the environmental assessment instead uses the outdated MOBILE6.2 modeling software. In addition, there should be a new mobile hot spot analysis. Particulate matter (PM2.5) is hazardous to human health – and PM2.5 levels at hot spots, where emissions may expose individuals to higher risks of adverse health effects, should be analyzed.

- A second private span would jeopardize the public health of residents, in an area that is already heavily polluted.
 - The area is currently out of compliance with the Clean Air Act for sulfur dioxide and there is inadequate monitoring for substances like black carbon particulate matter, nitrogen oxide, benzene, and hydrocarbons associated with diesel emissions. The World Health Organization has classified diesel emissions as carcinogenic.[4]
 - Asthma hospitalization rates in Detroit are over three times higher than the rates in Michigan as a whole.[5]
 - 48216, the zip code where the Ambassador Bridge is located, is has one of the highest rates of persistent asthma for children covered by Medicaid.[6]
 - Emissions from mobile sources, especially diesel, contribute to particulate matter in the air.[7] The stretch of bridge between Detroit and Windsor, Ontario is the busiest international crossing for commercial vehicles with nearly 13,000 trucks every day.[8] An increasingly large body of evidence indicates that traffic-related exposures and residential proximity to vehicular traffic[9] are associated with increased respiratory conditions and symptoms in children, including asthma[10] wheezing, recurrent respiratory illnesses[11], and hospital admissions for asthma.[12]
 - Every year in Detroit, there are an estimated 280 deaths and 380 heart attacks due to diesel emissions exposure.[13]
 - Dr. George Thurston from NY School of Medicine said: “I therefore conclude that any added fine particle exposures to the public from the proposed additional span at the Ambassador Bridge, if approved and built, will indeed have both acute and chronic adverse effects on the public health of persons living or working in communities in the vicinity of the bridge in Detroit as well as across the river in Windsor.” [14]
- Construction of a second private span would disturb contaminated soil at Riverside Park and require extensive remediation work near the Detroit River. Based on an analysis of sediment samples along Riverside Park collected in November 2015, the Michigan Department of Environmental Quality (MDEQ) says: “both the USEPA and DEQ believe environmental contamination is present at multiple points along the riverfront portion of the Riverside Park site.”[15] A modeling report from MDEQ about this contamination and its potential risks to human health is expected to be released in March.
- The Gordie Howe International Bridge project is well underway, and a cumulative impact

study is needed in order to accurately assess the environmental impact of a proposed second private span in addition to the existing Ambassador Bridge, Gordie Howe International Bridge, and the other existing sources of pollution in the area.

- A bi-national study between Canada and U.S. ranked the concept of a second private Ambassador Bridge as one of the worst possible options, primarily due to its environmental impact on the local neighborhoods.

Please take all of this into consideration, and protect our residents. Thank you for your time.

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