



CITY OF DETROIT  
**RAQUEL CASTAÑEDA-LÓPEZ**  
COUNCIL MEMBER - DISTRICT 6

February 28, 2016  
Admiral Paul F. Zukunft, Commandant (CG-BRG-2)  
U.S. Coast Guard Headquarters, Stop 7418  
2703 Martin Luther King Jr. Avenue  
Washington, DC 20593-7418

RE: Public Notice 09-01-16, Ambassador Bridge Enhancement Project

Dear Commandant,

Thank you for the opportunity to review the Ambassador Bridge Enhancement Project (ABEP) permit application. As a Detroit Council Member representing the sixth district, which includes the existing Ambassador Bridge and will encompass the ABEP, I respectfully request the Coast Guard ensure that the following conditions are met prior to the issuance of any permit related to the ABEP:

**a) An approved conversion application from the National Park Service and Michigan Department of Natural Resources to use Riverside Park land for non-recreational purposes.** To date, a conversion application for the Riverside Park property has not been submitted by the City of Detroit. Moreover, according to City attorneys the land exchange agreement (LEA) entered into by the Detroit International Bridge Company (DIBC), does not allow the DIBC to construct the project nor does it give the DIBC any greater legal interest in Riverside Park than it had prior to the approval of the LEA, as any conveyance of land or air rights is contingent upon an approved conversion application. Furthermore, the City of Detroit “lacks the legal authority to convey the relevant portions of riverside park. Therefore, the land exchange agreement, at this time cannot and does not properly convey to DIBC the right use portions of Riverside Park for the Ambassador Bridge Enhancement Project” (Department of Natural Resources, January 29, 2016)

**b) A full Environmental Impact Statement (EIS) is conducted and all findings of significant impact are remediated.** Given the significant environmental justice issues in the surrounding community and the potential 100-year impact, a project of this scale warrants a full EIS. The landscape has changed significantly given the expansion of the Marathon Oil Refinery and the approval of the Gordie Howe Bridge, adding the need to conduct a FEIS.

**c) A Health Impact Assessment and Public Health Assessment is conducted to determine the potential impacts of the project on surrounding population's health and the distribution of these effects within the population.** "The community has large - African-American and Latino populations and is known as an environmental justice community. Southwest Detroit has a large number of children and a high rate of poverty (37 percent of households). More than half of the children overall, and children less than 6 years of age in Southwest Detroit, lived in poverty in 2010. There are multiple sources of pollution in Southwest Detroit and surrounding communities, including the Marathon Oil Refinery, DTE Energy's coal plant, Zug Island, the Waste Water Treatment Plant, AK Steel, Great Lakes Steel and truck traffic to and from the Ambassador Bridge. The ZIP code 48216, where the Ambassador Bridge is located, has one of the highest rates of persistent asthma for children covered by Medicaid." (State Rep. Stephanie Chang, Letter to USCG 2.23.16). Environmental health in relation to air quality has been one of the main concerns of residents in District 6 brought to my attention.

In addition, I would like to offer the following comments, questions and suggestions regarding the re-evaluation process and permit application as it is fundamentally flawed. It is fundamentally flawed by its narrow scope, limited definitions of environmental impact and procedural shortfalls as listed below:

1. All of the comments submitted in 2009 should be included in this re-evaluation process given that the process was not re-started.
2. The environmental assessment is based on outdated data, dating back to 2001. This should be corrected with an updated analysis using current data generated from EPA required models and protocols conducted.
3. The analysis relies on the As-Built Gateway configuration rather than the originally planned configuration, which differ.
4. Mobile6 was the latest EPA approval model at the time of the original Final EA, but not at the time of the re-evaluation. As stated, this should be addressed and current data and EPA models and protocols should be followed.
5. USEPA recommends that "air quality and travel forecasts be updated with more recent data" (October 2015 letter), yet this information was not updated during the reevaluation process.
6. The reevaluation only looks at the proposed 6-lane new bridge and does not take into account that in reality the ABEP will result in a full 10-lane two span bridge. This was neglected in the projected traffic projections. Moreover, the reevaluation does not address the significant impacts on traffic in the surrounding areas.
7. The project appears to be segmented and the application submitted incomplete as the plaza would need to be modified to accommodate both spans, yet this is not adequately addressed in the application and would require a separate application.

8. The DIBC should follow the process identified in EPA's "Transportation Conformity Guidance for Quantitative Hot-Spot Analyses in PM2.5 and PM10 Nonattainment and Maintenance Areas". This process should be used to determine the impacts and address air quality concerns of the local community.
9. The ABEP will lead to increased SO2 emissions in an area that is already in nonattainment according to the Michigan Department of Environmental Quality (MDEQ) by Environmental Protection Agency (EPA) standards. The Coast Guard is dismissive of this fact and does not adequately factor in the DIBC's role in contributing to SO2 emissions. From a regional standpoint, it may be easy to dismiss ABEP's overall impact; however, the impact is very significant when considered as a part of the non-attainment level. USGC concludes that the ABEP would contribute only a small portion of the SO2 in Wayne County; this conclusion, however, does not account for the fact that while the ABEP Final EA Re-Evaluation lists the 2007 SO2 NAAQS standard of 80 ug/m<sup>3</sup>, EPA had already promulgated a new (more stringent) standard in 2010 at 75 ppb. As of 2010 Wayne County SO2 levels were at 90ppb (15 unites over the 2010 NAAQS); ABEP would represent 2.5% of this nonattainment level ( $.36/15 = 2.5\%$ ) a greater contribution to the nonattainment situation than the overall contribution of 0.45% would suggest (also more significant than the USGC's conclusions would suggest ( $.36/18.7 = 2.0\%$ )).
10. In a letter from County Executive Warren Evans to the Michigan Department of Environmental Quality (MDEQ), dated Feb. 10, 2016, Evans wrote: "Wayne County ranked 82/82 in air pollution and particulate matter density...Pollution levels in Wayne County (12.8) exceed both the national (11.9) and the State (11.5) levels...Residents in Detroit reporting poor to fair health are... at 31.4%. The number of children reporting poor health is particularly alarming, as are the higher rates among minority populations and African Americans." Given this data and the fact that two-thirds of the trucks projected to use the bridge are likely to still be using old diesel technology the USGC should not be so optimistic about the positive impact NTDE might have on current air quality in the project area.
11. The ABEP potential SO2 impacts should have been evaluated and warrant a FEIS given the significant health implications of SO2.

It is irresponsible to determine the potential impact on the human environment using outdated equipment, data and regional averages about existing pollutants. As we all know, because of the tragedy that has occurred in Flint -- given the irresponsible and dismissive behavior of State government entities -- we must make sure that this does not happen in Detroit. What is the cost of dismissing concerns now? What are the long term implications? There is enough science out there to calculate the potential health impact the surrounding community would suffer. In order to protect the public health of our communities a FEIS must be conducted. It is our responsibility as elected officials and governmental agencies to protect the health and well-being of our residents and our communities.

My remaining questions regarding this project are:

- What are the standards for re-evaluation?
- What are the requirements for notifying the public?

- Is the City at attainment for particulate matter density?

Again I re-emphasize the need for the Coast Guard to ensure the following is completed prior to an issuance of a permit.

**a) An approved conversion application from the National Park Service and Michigan Department of Natural Resources to use Riverside Park land for non-recreational purposes is submitted.**

**b) A full Environmental Impact Statement (FEIS) is conducted and all findings of significant impact are re-mediated.**

**c) A Health Impact Assessment and Public Health Assessment be conducted to determine the potential impacts of the project on surrounding population's health and the distribution of these effects within the population.**

Thank you for the opportunity to submit public comment regarding the Ambassador Bridge Enhancement Project. Please feel free to contact me at (313) 224-2450 or [councilmemberraquel@detroitmi.gov](mailto:councilmemberraquel@detroitmi.gov) if you have any questions.

Sincerely,



Raquel Castañeda-López  
Council Member  
City of Detroit – District 6