

**From:** [Hubbard Farms](#)  
**To:** [Garneau, Allen M CIV](#)  
**Subject:** [Non-DoD Source] Public Notice 09-01-16, Ambassador Bridge Enhance  
**Date:** Monday, February 29, 2016 12:11:33 AM

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Dear Mr. Garneau,

On behalf of the Hubbard Farms Neighborhood Association, we submit the following as public comment our concerns in opposition to the proposed Ambassador Bridge Enhancement Project (ABEP) which proposes to construct a companion bridge adjacent to the existing Ambassador Bridge across the Detroit River between Detroit and Windsor, Ontario

The Hubbard Farms Neighborhood Association is a resident-led association within the Hubbard Farms Historic District, an officially designated historic district in the City of Detroit. Our purpose includes the preservation of the physical appearance of the neighborhood; enhancement of the quality of life and security of residents; promotion of quality schools; communication with and engagement of residents; and promotion of cooperation and understanding between all the residents, the community businesses, and all government entities.

Hubbard Farms Historic District is a vibrant, densely populated, mixed-income community of approximately 1,500 residents. The neighborhood, with homes dating to the late 1800's, consists of households of 30+ years as well as more recent residents seeking a racially and ethnically diverse community of families, retirees, and single adults.

Our community is adjacent to the entrance to the existing Ambassador Bridge at W. Grand Blvd., just south of W. Lafayette St. The Hubbard Farms Historic District includes the area bounded by W. Grand Blvd., W. Lafayette St., Clark St., and W. Vernor Hwy.

As the immediate neighbors of the proposed ABEP, we note the following concerns:

1. The Detroit International Bridge Company (DIBC) does not have the legal right to the land needed to build the proposed span. This is the same issue for which the US Coast Guard denied approval in 2007.

The 2<sup>nd</sup> span requires land that is designated for recreational use and which for decades has been a part of Riverside Park, a park many Hubbard Farms residents have used for softball and other recreational purposes.

The State of Michigan has allocated millions in funds from Natural Resources Trust Fund and the Land and Water Conservation Fund 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 Department of Interior and Michigan Department of Natural Resources would need to approve the conversion of this land away from public outdoor recreation use.

Despite a proposed land swap between the DIBC and the City of Detroit, it is our understanding that the City of Detroit and the DIBC have not submitted any application for a land conversion, which would be required for the ABEP to move forward.

Our understanding is that this approval is unlikely. The Department of Natural Resources has indicated that 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."

2. The ABEP's environmental assessment is flawed. The environmental assessment was presented in 2007, nine years ago; it is based on outdated data, wrong assumptions, and procedural errors. We have the following concerns:

- o The environmental assessment does not take into consideration 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).
- o 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.
- o 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.
- o The environmental assessment has major procedural shortfalls. As noted in the Michigan Department of Transportation's public comment, the EPA has recommended that the "MOVES2014 mobile source emissions model" be used "to develop updated mobile source emissions projections" 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.

3. A full environmental impact study is needed to address the public health concerns that the ABEP would present. We believe the proposed ABEP would jeopardize the public health of Hubbard Farms residents who live in an area that is already heavily polluted.

Hubbard Farms is a densely populated community with three schools - elementary, K-8, and high school - within the historic district and another high school, just outside the district on 25<sup>th</sup> St., a few blocks from the Ambassador Bridge.

- a. Air quality in Southwest Detroit is out of compliance with the Clean Air Act. Asthma hospitalization rates in Detroit are over three times higher than the rates in Michigan as a whole.
- b. 48216, the zip code where the Ambassador Bridge is located, has one of the highest rates of persistent asthma for children covered by Medicaid.
- c. Emissions from mobile sources, especially diesel, contribute to particulate matter in the air. The stretch of bridge between Detroit and Windsor, Ontario is the busiest international crossing for commercial vehicles with nearly 13,000 trucks every day. An increasingly large body of evidence indicates that traffic-related exposures and residential proximity to vehicular traffic are associated with increased respiratory conditions and symptoms in children, including asthma wheezing, recurrent respiratory illnesses, and hospital admissions for asthma.

We ask that you not approve the Ambassador Bridge Enhancement Project for the reasons stated and ask that a full environmental impact study be conducted to assess the full impacts of this project on our community.

Respectfully submitted,

Hubbard Farms Neighborhood Association Board

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