

276 W. Grand Blvd.
Detroit, MI 48216

February 22, 2016

Commandant (CG-BRG-2)
U.S. Coast Guard Headquarters, Stop 7418
2703 Martin Luther King Jr. Ave., SE
Washington, DC 20593-7418

Re: Public Notice 09a-01-16

Dear Coast Guard Representative:

As a resident in the Hubbard Farms neighborhood adjacent to the Ambassador Bridge, I am writing to express my deep concerns about the permit application of the Ambassador Bridge to build a second span. The Detroit International Bridge Company (DIBC) has an extensive history of misrepresentation and appears to be following this tact in its recent application.

To begin with, the fact that the USCG is even considering their application at this time is unfathomable. As Mayor Duggan considered the Riverside Park land transfer in 2015, numerous concerned community residents knowledgeable on the process stated that the transfer could not be made legal or complete without state and federal approval. While this went unheeded at the time, it is clear now, as the State of Michigan has recently declared, 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. Furthermore, the Department of Natural Resources recently publicly stated 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.”

Additionally, the environmental assessment completed to-date is faulty, lacking in accuracy, and completely inadequate. Nothing short of a full Environmental Impact Statement (EIS) should be considered for a major project of this scope. Even then, an EIS would not be sufficient without considering the full environmental effects of the existing Ambassador Bridge, proposed 2nd span, and the Gordie Howe International Bridge. The current assessment does not consider all these projects and their cumulative impact on 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. Asthma hospitalization rates in Detroit are over three times higher than the rates in Michigan as a whole. 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. Personally, I have lived in this neighborhood for 17 years. Since moving

in, I have developed asthma which can only logically be concluded has been due to at least, in part, the high truck traffic and associated pollution. It is unconscionable that anyone, the USCG included, would consider further polluting the environment in this area. With the large minority and low-income populations, the proposal seems to fly in the face of the environmental justice tenets. In fact, 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.

The area surrounding the bridge is thriving in spite of the DIBC's efforts to stymie it. I now have twin girls who are nearly two years old. To entertain this application request, much less to approve it, would put the USCG in a complicit position to cause further harm to the hard working people, and our children, who live here. If this were to proceed, I and many of my neighbors would have to reconsider our ability to have the quality of life most people consider as a matter of right. Of course, there are many residents who lack the means to move and would be stuck with the negative ramifications of your decision on their health and well-being. We implore you to not approve the DIBC's application.

Sincerely,

Victor Abla