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February 1, 2016

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Washington, DC 20593-7418

To Whom It May Concern:

Subject: Public Notice 09-01-16
Ambassador Bridge Enhancement Project Permit Application

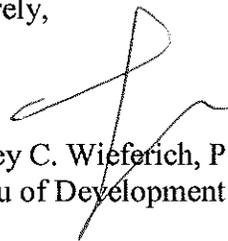
Thank you for the opportunity to review the *Ambassador Bridge Enhancement Project (ABEP) Reevaluation - Environmental Assessment* as part of the ABEP U.S. Coast Guard (USCG) permit application. The Michigan Department of Transportation (MDOT) would like to offer the following comments/questions on the permit application and reevaluation.

- **Land Use, 3.2** – Although the city council has approved the plan to replace parkland lost to the new bridge with other property, the Michigan Department of Natural Resources (MDNR) and U.S. Department of the Interior (USDOJ) National Park Service who administer the Land and Water Conservation Fund grants play a role in deciding whether or not the proposed mitigation for the loss of parkland is acceptable. Will the USCG approve a permit for this bridge without agreement from MDNR and the USDOJ on the mitigation? Will the USCG also need to see the new parkland zoned by the city for park and recreation use before approving a permit?
- **Air Quality, 3.10** – The assumption on vehicle process times in the second paragraph on page 3-3 seems to reflect the ideal scenario and not the very conservative assumption as stated.
- **Table 3-1, page 3-4** – Titled “Year 2010 Existing Bridge NAAQS Modeling Results” is based on a 2007 report and should be revised to reflect an updated analysis using current data and EPA required models and protocols.
- **Page 3-6** – We recommend that all analyses rely on the As-Built Gateway configuration rather than the originally planned configuration because they differ. In some places, it is not clear which version of the Gateway project was used. For example, the 2009 air quality dispersion modeling analysis first considered the As-Built Gateway configuration and then states that it assessed the originally planned configuration. Also, the MOVES model is the only Environmental Protection Agency (EPA) approved air quality emissions model for air quality analysis, yet it was not used for this reevaluation.

- The air quality analysis process has significantly changed since original publication of the Environmental Assessment (EA). 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*, and this process should be used to determine these impacts and address air quality concerns of the local community. As a project determined regionally significant by the EPA, the air quality analysis should be reviewed by the Interagency Air Quality Working Group as noted in EPA guidance for compliance with the Clean Air Act.
- The proposed project should be in the current Southeast Michigan Council of Government's (SEMCOG's) Transportation Improvement Plan and it should also be included in the 2040 Regional Transportation Plan. Will the USCG issue a Finding of No Significant Impact without the project being listed in these SEMCOG plans?
- **Traffic** - The document does not address impacts of traffic on the surrounding area. The EA states the new bridge will improve the efficiency of handling traffic during peak periods, which means it will change the way traffic flows into and out of the proposed facility. In addition, previous versions of the EA evaluated traffic impacts based on a "Gateway Project" plaza design that was different from what was actually constructed. Traffic impacts should be evaluated based on the "as built" design.
- **Other** – A permit from the Federal Aviation Administration for tall structures will be needed due to the tower height.

Again, thank you for the opportunity to comment on the reinitiated Ambassador Bridge Enhancement Project permit application and reevaluation. As you can see, we have a number of comment/questions that have yet to be addressed. Should you need further clarification of our comments, please contact either me or Margaret Barondess, Environmental Services Section Manager, at 517-335-2621.

Sincerely,



Bradley C. Wieferich, P.E., Director
Bureau of Development

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