

From: [catalina rios](#)
To: [Garneau, Allen M CIV](#)
Subject: [Non-DoD Source] USCG comments
Date: Friday, February 26, 2016 12:40:15 PM

Dear Mr. Garneau,

My name is Catalina Rios and I am writing regarding the Ambassador Bridge Enhancement Project (Public Notice 09-01-16). I live in Southwest Detroit and I have personally witnessed the harm of living near so much diesel emission. I urge the USCG to elevate the ABEP to be evaluated through an Environmental Impact Statement especially since the current **environmental assessment is incorrect because it is based on outdated data and procedural shortfalls.** The environmental assessment uses outdated data.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 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be used “to develop updated mobile source emissions projections,” but the environmental assessment instead uses the outdated MOBILE6.2 modeling software.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.

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. Asthma hospitalization rates in Detroit are over three times higher than the rates in Michigan as a whole. The zip code where the Ambassador Bridge is located, is has one of the highest rates of persistent asthma for children covered by Medicaid. **The Bridge Company is choosing to ignore Detroit residents for their own self profit!**

It is also important to note that the City of Detroit did not have authority to convey ownership of Riverside Park which is needed for the new bridge proposal. We already have very limited access to public spaces, especially parks. Our families deserve to keep Riverside Park for recreational use.

Thank you for considering my comments and I hope the USCG does everything in their authority to ensure that the Bridge Company is not trying to avoid following the laws that are there to protect the public.

Sincerely,

Catalina Rios