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

Re: Detroit International Bridge Company Application for Twin Span

Dear Commandant:

As a resident and homeowner who lives within two blocks of the West Grand Boulevard of the Ambassador Bridge, I am writing to urge you to **deny** the permit request of the Detroit International Bridge Company application to build a twin span. While I echo the comments that others in the community I am sure are submitting as well—and that I restate below—I am writing to **urge you to consider the tremendous injustice granting this application would pose.**

Simply put, through the DIBC's actions, this application is a text book case of **segmentation** in which it DIBC has sought to take a long-term project—twinning its bridge and building expanded Customs plazas and freeway improvements—without fully submitting the project for review through one application process, instead seeking a series of separate permits and clearances that individually can be justified, but collectively would not pass muster. **The nature of building the Ambassador Gateway Project and twin span necessitates a full Environmental Impact Statement with current traffic studies, air quality analysis, etc., under the National Environmental Protection Act (NEPA).**

The unfair nature of the current application is personally highlighted for me as the former State Representative for this area from 2003-2008. During that time this permit request to the U.S. Coast Guard was submitted, I was the State Representative and I joined several hundred of my neighbors in attending public hearings and opposing the permit application. I submitted comments objecting to this project on segmentation grounds during that process. You can imagine my surprise after months of work to learn that DIBC did not have legal rights to execute

its original plans at the time that it submitted its application. Months of work on behalf of this community, taking precious time away from other obligations as the community's elected official, when DIBC didn't even have the means to execute the actions for which it sought approval.

I am outraged that the permit application is being moved forward and that decisions seem to have been made since that juncture—all without any public input until the last month or two. **I urge the Coast Guard to review ALL of the comments submitted during the hearings and processes in 2006-2009 (until the permit was halted). Most, if not all, of the reasons for rejecting this permit hold true today.** Most specifically are my concerns that the pending application is a text book case of segmentation and a violation of the NEPA. This is especially concerning given that (1) DIBC has misrepresented its property rights during the current permit; (2) has sought to litigate the permit; (3) has demonstrated an inability to maintain the current bridge structure; (4) was forced to serve jail time for its inability to execute obligations under the Gateway project; and (5) recently was found by local media to be involved—either directly or indirectly—of paying residents to testify at the public hearing (paying them in cash and, most likely, in violation of various IRS rules).

In addition to these issues, I want to draw your attention to the following issues which should help you in denying the application:

- **The Bridge Company does not have the land they need in Detroit to build a second private span.** 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.
 - The Department of Natural Resources says 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.”¹
- **The environmental assessment is incorrect because it is based on outdated data, wrong assumptions, and procedural errors. In addition, a long-term transportation project of this magnitude and with close**

¹ MDOT public comment on ABEP submitted to U.S. Coast Guard, dated January 29, 2016.

proximity to schools, parks and homes deserves a full Environmental Impact Study (EIS).

- **The environmental assessment is segmenting this border project to avoid doing a full Environmental Impact Study.** There are 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).
- 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 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.
- **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.

- Asthma hospitalization rates in Detroit are over three times higher than the rates in Michigan as a whole.²
- 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.³
- 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.
- Every year in Detroit, there are an estimated 280 deaths and 380 heart attacks due to diesel emissions exposure.⁴
- Dr. George Thurston from NY School of Medicine said: “I therefore conclude that any added fine particle exposures to the public from the proposed additional span at the Ambassador Bridge, if approved and built, will indeed have both acute and chronic adverse effects on the public health of persons living or working in communities in the vicinity of the bridge in Detroit as well as across the river in Windsor.”⁵
- **Construction of a second private span would disturb contaminated soil at Riverside Park and require extensive remediation work near the Detroit River.** Based on an analysis of sediment samples along Riverside Park collected in November 2015, the Michigan Department of Environmental Quality (MDEQ) says: “both the USEPA and DEQ believe environmental contamination is present at multiple points along the

² Wasilevich EA, Lyon-Callo S, Rafferty A, Dombkowski K. “Detroit – The Epicenter of Asthma Burden.” *Epidemiology of Asthma in Michigan*. Bureau of Epidemiology, MI Department of Community Health, 2008.

³ Ibid.

⁴ *Clean Air Task Force. Diesel and Health in America, the Lingering Threat*. Boston, MA. www.catf.us/resources/publications/files/Diesel_Health_in_America.pdf

⁵ Comments to US Coast Guard regarding draft environmental assessment, submitted by Christopher M. Bzdok, Olson, Bzdok, & Howard, dated August 30, 2007.

riverfront portion of the Riverside Park site.”⁶ A modeling report from MDEQ about this contamination and its potential risks to human health is expected to be released in March 2016.

- **The Gordie Howe International Bridge project is well underway, and a cumulative impact study is needed** in order to accurately assess the environmental impact of a proposed second private span in addition to the existing Ambassador Bridge, Gordie Howe International Bridge, and the other existing sources of pollution in the area.
- 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.

For these and the many other reasons in my comments submitted nearly a decade ago on this permit, I urge you to reject the application.

Sincerely,

Steve Tobocman

⁶ Email from Joshua Scheels, MDEQ remediation and redevelopment division, to State Representative Stephanie Chang, dated January 7, 2016.