



U.S. Department  
of Transportation  
**Federal Highway  
Administration**

Michigan Division

315 W. Allegan, Room 201  
Lansing, Michigan 48933

February 20, 2009

Ms. Susan P. Mortel, Director  
Bureau of Transportation Planning (B340)  
Michigan Department of Transportation  
Lansing, Michigan

Dear Ms. Mortel:

The Federal Transit Administration and Federal Highway Administration have jointly reviewed the Southeast Michigan Council of Governments (SEMCOG) 2030 Regional Transportation Plan (RTP) amendment submitted by your letter of January 12, 2009. Our review compared the amended plan with the requirements of 49 USC 1607, 23 USC 134, the Clean Air Act Amendments of 1990 (CAAA), and the regulations issued in connection with each Act. The air quality conformity portion of our review was coordinated with the Environmental Protection Agency (EPA).

We find that the SEMCOG 2030 RTP as amended is in conformance with the transportation related requirements of the 1990 CAAA and the regulations for determining conformity of transportation plans and programs to State Implementation Plans (SIP) for air quality as contained in 40 CFR Part 93. A new conformity finding will be required if the plan is modified by adding or deleting non-exempt projects, or if any of the triggering events specified in 40 CFR 93.104 occur.

If there are any questions concerning our action on this plan, please contact Jim Cramer, at (517) 702-1827 or Stewart McKenzie at (312) 353-2866.

Sincerely,

Original signed by:

James R. Cramer  
Transportation Planning Engineer

For: James J. Steele  
Division Administrator

Doc# 99825

**MOVING THE  
AMERICAN  
ECONOMY**



Glenn H. Wittman/5PM/R05/GSA/GOV  
01/05/2009 05:09 PM

To  
Jim L. Sharp Jr/5PB/R05/GSA/GOV@GSA  
cc  
Michele A. Sharples/5PB/R05/GSA/GOV@GSA, John R.  
Caswell/5PM/R05/GSA/GOV@GSA  
Subject  
Re: Fw: BWB FEIS Comments

Jim,

I have reviewed the FEIS (Draft Nov 19, 2008) prepared by MDOT and have not identified any errors or omissions from GSA's NEPA perspective, which is that of a cooperating agency. I do note that the FEIS has been revised from the earlier DEIS, based on a new or updated Program of Requirements, and focuses on specific changes to the project since public review of the DEIS. Provided that mitigation measures are carried out as summarized in the "green sheet" and in chapter 5, there should be no lasting, significant, adverse effects on the human environment from the Recommended Alternative as described.

I do advise, however, that we (GSA) perform our own focused NEPA analysis that addresses any issues or concerns related to GSA leasing and operation activities at the new plaza prior to final design and construction of the selected alternative. This could be in the form of a properly completed detailed CATEX Checklist or a brief EA.

.....  
GLENN H. WITTMAN  
NEPA Program Coordinator/REQA  
Architecture & Engineering Programs Division

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GSA Public Buildings Service  
Great Lakes Region (5)  
230 S. Dearborn St., Rm. 3600  
Chicago, Illinois 60604

-----  
O: 312.353.6871  
C: 312.914.5631  
F: 312.353.1304  
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REPLY TO  
ATTENTION OF:

DEPARTMENT OF THE ARMY  
DETROIT DISTRICT, CORPS OF ENGINEERS  
REGULATORY OFFICE  
PO BOX 1027  
DETROIT, MI 48231-1027

December 22, 2008

Engineering & Technical Services  
Regulatory Office  
File No. LRE-1993-120621

Matt Webb  
Michigan Department of Transportation  
425 West Ottawa Street  
Lansing, MI 48933

Dear Mr. Webb:

We have reviewed your letter and your Pre-Final EIS dated November 19, 2008 (copy enclosed) for the Blue Water Bridge Plaza Study in St. Clair County, Michigan.

You have selected your preferred alternative that will have impacts on wetlands that lie under Corps jurisdiction and stated that you will create wetlands to mitigate for those impacts.

We reiterate that a Department of the Army Permit will be required prior to initiating work in wetlands. A Compensatory Mitigation Plan detailing the nature of the wetlands to be created or restored should be submitted with the permit application. Reference our previous response letters dated January 27, 2006 and September 27, 2007 (copies enclosed).

Our permit evaluation will begin only after the receipt of a completed permit application form. To expedite evaluation of your proposal we encourage you to submit a permit application with appropriate drawings and mitigation plan as soon as that information becomes available.

Your response and any questions should be directed to Patrick O'Connor at the above address or telephone 313.226.1328 or E-Mail [patrick.s.oconnor@us.army.mil](mailto:patrick.s.oconnor@us.army.mil). Please refer to File No. LRE-1993-120621 in all future communications with this office.

Sincerely,

John Konik  
Chief, Regulatory Office  
Engineering and Technical Services

Copy Furnished

David Wresinski w/ encl  
Abdelmoez Abdalla w/ encl

12/10/2007 MON 17:40 FAX



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION 5  
 77 WEST JACKSON BOULEVARD  
 CHICAGO, IL 60604-3590

DEC 10 2007

REPLY TO THE ATTENTION OF

B-19J

David W. Wresinski, Administrator  
 Project Planning Division  
 Bureau of Transportation Planning  
 Michigan Department of Transportation  
 Murray D. Van Wagoner Building  
 P.O. Box 30050  
 Lansing, Michigan 48909

Re: Comments on the Draft Environmental Impact Statement for the Blue Water Bridge  
 Plaza Study, St. Clair County, Michigan - EIS No. 20070388

Dear Mr. Wresinski:

The U.S. Environmental Protection Agency Region 5 (U.S. EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the Blue Water Bridge Plaza (Plaza) Study located in St. Clair County, Michigan. Our comments in this letter are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

A DEIS for the Study was prepared by the Michigan Department of Transportation (MDOT) in cooperation with the Federal Highway Administration with the goal of developing a 2030 plan for improvements at the Plaza and the I-94/I-69 Corridor (Corridor). Reasons stated for improvement to the Plaza and the Corridor including the following:

- ◆ Improve safety on the Bridge, at the Plaza, and on the Corridor;
- ◆ Minimize backups on Highway 402 in Canada and on the Corridor;
- ◆ Reduce vehicle and pedestrian conflicts on the Plaza and along the Corridor;
- ◆ Accommodate projected 2030 traffic growth and potential future facility needs;
- ◆ Accommodate latest Customs and Border Protection inspection technologies and procedures;
- ◆ Provide flexibility to accommodate future unknown inspection technologies and procedures;
- ◆ Improve security at the Plaza;
- ◆ Improve access between the Plaza and the Port Huron area; and
- ◆ Create a more visible and accessible Welcome Center.

The Draft EIS evaluates four alternatives:

**No Build Alternative** - The No Build Alternative would not involve any changes to the existing Plaza configuration or ramps, nor would it involve any improvements to the Black River Bridge or the Corridor. However, continued maintenance and technology improvements would continue as space allows.

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P.2/4

TO:517 373 9255

312 353 5374

DEC-10-2007 16:21 FROM:US EPA REGION 5

- City East Alternative - The City East Alternative expands the existing plaza within the City of Port Huron. This alternative would relocate Pine Grove Avenue to the east around the expanded Plaza.
- City West Alternative - The City West Alternative expands the existing plaza within the City of Port Huron. This alternative is similar to the City East Alternative, except that Pine Grove Avenue would be relocated to the west around the expanded Plaza.
- Township Alternative - The Township Alternative involves the relocation of major Plaza functions to a mostly undeveloped site in Port Huron Township, 1.5 miles west of the current Plaza via a six-lane, secure roadway running between the existing Plaza and the new site.

The City West Alternative was identified as the Preferred Alternative in the DEIS.

The DEIS adequately conveys the process by which alternatives were developed, evaluated, and either dismissed or selected. It also explains the Plaza facilities/security design criteria used to select the Preferred Alternative. The Preferred Alternative fulfills the reasons stated in the DEIS for improving the Plaza.

Based on our review of the DEIS, the U.S. EPA has rated the Draft EIS as "Environmental Concerns-Insufficient Information." This rating will be published in the Federal Register. A copy of our rating definitions is enclosed. We recommend the final EIS address the following issues.

Air Quality

We have participated in discussions with FHWA and MDOT during development of the DEIS and appreciate the efforts of both agencies to address our concerns concerning air impacts. We have reviewed the discussion concerning air impacts included in the DEIS, and offer the following comment.

During these discussions, we have expressed disagreement with the following statement found in Section 3.9.4 - What Impacts from Mobile Source Air Toxics (MSAT) are Anticipated with the Project's Alternatives? (page 3.9-11):

"Technical shortcomings of emissions and dispersion models and uncertain science with respect to health effects prevent meaningful or reliable quantitative estimates of MSAT emissions at the project level."

We continue to request that this statement be stricken from the EIS. We believe this statement is not consistent with current academic literature and other published guidance.

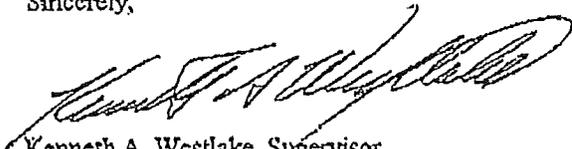
Green Building Design

A recent General Services Administration DEIS for the new U.S. Border Station and Commercial Port of Entry in Derby Line, Vermont, included commitments to design the project to incorporate elements of sustainable design and to certify buildings through the Leadership in Energy and Environmental Design (LEED) program. LEED is the nationally-accepted benchmark for the design, construction, and operation of high-performance green buildings intended to maximize operational efficiency while minimizing environmental impacts.

We encourage the FHWA and MDOT to commit to creating a sustainable building implementation plan for the Blue Water Bridge Plaza. Such a plan could incorporate the use of recycled materials, natural light, passive solar heating, energy efficient lighting, water conserving plumbing, innovative stormwater management, and Energy Star equipment. For additional information regarding the LEED program, please access the following website: <http://www.usgbo.org/DisplayPage.aspx?CategoryID=19>. We are also available to assist the FHWA and MDOT in this effort.

In summary, we request the FHWA and MDOT revise the EIS by deleting the statement concerning emissions and dispersion modeling and committing to creating and implementing a sustainable building implementation plan for the Plaza. We are available to discuss these comments, and we look forward to receiving the Final EIS when it becomes available. Should you have any questions, please do not hesitate to contact Kathleen Kowal of my staff at (312) 353-5206 or via email at [kowal.kathleen@epa.gov](mailto:kowal.kathleen@epa.gov).

Sincerely,



Kenneth A. Westlake, Supervisor  
NEPA Implementation  
Office of Enforcement and Compliance Assurance

Enclosure - Summary of Rating Definitions

Vance, Rhonda K.

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**From:** jim.sharp@gsa.gov  
**Sent:** Monday, December 10, 2007 3:00 PM  
**To:** WebbMa@michigan.gov  
**Cc:** dana.pionke-garcia@gsa.gov  
**Subject:** Fw: DEIS comments for Port Huron

Attached please find GSA's comments on the DEIS for Port Huron.

*Jim Sharp*



U.S. General Services Administration

Realty Specialist/Project Manager  
Office of Border Stations

(Ofc) 312-353-5601  
(Fax) 312-353-7387

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I have reviewed the Blue Water Bridge Plaza Study DEIS (signed August 10, 2007) and have the following comments:

- 1) The narrative on the DEIS cover/signature page states: "The City West Alternative has been identified as the Preferred Alternative in this document. Important issues and concerns related to the effects of the Practical Alternatives on the ... environment include neighborhood and community cohesion, visual character, noise, air quality, and land use patterns." Yet visual character, air quality, and land use are not included in the Summary of Impacts table for the four alternatives. The table should be revised to include all potentially significant impacts.
- 2) The figures in Appendix E are generally good and show relevant information, **however** the Legend box on Figures E.3 - E.14 and E.18 - E.19 should be revised and expanded to show **all** the graphic symbols and colors (lines, dots, cross-hatch patterns, colors and shadings, etc.) depicted on the figures themselves. Currently, the information depicted on these figures is incomplete or ambiguous. It is hard to read the labels through the darker colors (reds and blues) in particular.
- 3) Given the amount of apparent "public controversy" (i.e., political and community concerns) involving the project (based on the February 5 and 27, 2007, letters to Governor Granholm from the City of Port Huron and Senator Levin, respectively), following the NEPA process to the strict letter of the law is essential for public acceptance and buy-in to the final selected alternative whether City West, City East, or the Township.
- 4) The Project Mitigation Summary ("Green Sheet") at the end of Chapter 5 could be a very useful tool in addressing and allaying public concerns about unavoidable impacts (especially adverse or detrimental ones) resulting from the project. Every effort should be made to ensure that this summary is as complete and up-to-date as possible.

12/24/2007

Thank you for the opportunity to review and comment on this EIS.

.....  
Glenn H. Wittman  
Regional NEPA Coordinator/REQA  
Architecture & Engineering Programs Division

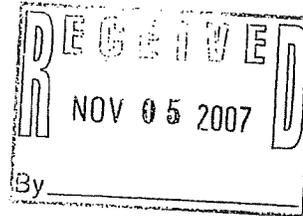
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GSA Public Buildings Service  
Great Lakes Region  
230 S. Dearborn Street, Suite 3600  
Chicago, IL 60604  
tel 312.353.6871 fax 312.353.1304  
cell 312.914.5631  
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UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
NATIONAL OCEAN SERVICE  
National Geodetic Survey  
Silver Spring, Maryland 20910-3282

October 31, 2007

Mr. Bob Parsons  
Public Hearings Officer  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, Michigan 48909



Dear Mr. Parsons,

We have provided comments on the DEIS regarding the Blue Water Bridge Plaza Study & Improve the I-94/1-69 Corridor, To Provide Safe, Efficient & Secure Movement of People & Goods across the Canadian-US Border, Pt Huron Area, St Clair Co, MI (20070388).

The DEIS has been reviewed within the areas of the National Oceanic and Atmospheric Administration, National Geodetic Survey's (NGS) geodetic responsibility, expertise, and in terms of the impact of the proposed actions on NGS activities and projects.

If there are any planned activities which will disturb or destroy geodetic control monuments, NGS requires notification not less than 90 days in advance of such activities in order to plan for their relocation. NGS recommends that funding for this project includes the cost of any required relocation(s).

All available geodetic control information about horizontal and vertical geodetic control monuments in the subject area is contained on the homepage of NGS at the following Internet address: <http://www.ngs.noaa.gov>. After entering this website, please access the topic "Products and Services" then "Data Sheet." This menu item will allow you to directly access geodetic control monument information from the NGS database for the subject area project. This information should be reviewed for identifying the location and designation of any geodetic control monuments that may be affected by the proposed project.

We hope our comments will assist you. Thank you for giving NGS the opportunity to review your DEIS.

Sincerely,

Christopher W. Harm  
Program Analyst  
NOAA's National Geodetic Survey  
Office of the Director  
1315 East-West Highway  
SSMC3 8729, NOAA, N/NGS  
Silver Spring, Maryland 20910





# United States Department of the Interior

OFFICE OF THE SECRETARY  
Washington, DC 20240

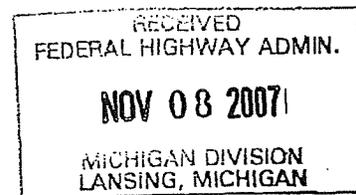


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PEP/NRM

ER 07/754

Mr. James J. Steele  
Division Administrator  
Federal Highway Administration  
315 West Allegan Street, Room 201  
Lansing, Michigan 48933



Dear Mr. Steele:

As requested, the Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement (EIS) and Draft Section 4(f) Evaluation for the **Blue Water Bridge Plaza Study, St. Clair County, Michigan**. The Department offers the following comments and recommendations for your consideration.

## General Comments

The draft EIS provides a comparison between the no-build alternative and three practical alternatives to expand the international Blue Water Bridge Plaza, as well as make improvements to the I-94/I-69 Corridor and Black River Bridge. In 2006, the Federal Highway Administration (FHWA) and Michigan Department of Transportation (MDOT) split the Blue Water Bridge Plaza Study and the I-94/I-69 Corridor and Black River Bridge Study into two separate documents. In a letter dated December 18, 2006, the U.S. Fish and Wildlife Service (FWS) accepted the request from MDOT to become a participating agency on the proposed I-94/I-69 Environmental Assessment (EA) Corridor Study. Since that time, the FHWA and MDOT have combined the EIS for the plaza study with the EA for the corridor study into the current document. This draft EIS identifies the City West Alternative as the preferred alternative.

## Section 4(f) Evaluation Comments

The draft Section 4(f) evaluation identified properties in the project study area eligible to be considered under Section 4(f) of the Department of Transportation Act of 1966 (48 U.S.C. 1653(f)). Four properties, Port Huron Township Parks No. 1 and No. 2, Riverside Park, and the E.C. Williams House, were found to be in the project area, but the evaluation determined that only Township Park No. 1 and the E.C. Williams House

would be affected by the project. Approximately a 0.3 acre of land will be permanently required from Port Huron Township Park No. 1 for road reconstruction, approximately 1.2 acres potentially for stormwater diversion, and a temporary easement of 0.1 acre at the park entrance for grading purposes. Township officials have agreed in writing with the *de minimus* findings and proposed mitigation.

The E.C. Williams House has been determined to be eligible for the National Register of Historic Places as an excellent example of an early Queen Anne duplex residence, and because it was associated with E.C. Williams, a prominent local newspaper publisher. The property is also a Registered Michigan Historic Site. The evaluation considered two other action alternatives and the no-action alternative that would have avoided impacts to the property; however, these were determined not to be prudent alternatives. The preferred alternative would result in an adverse effect determination with the Michigan State Historic Preservation Officer (SHPO). The SHPO has agreed in principle with the mitigation provided by FHWA and MDOT, but a memorandum of agreement (MOA) has yet to be executed.

The Department would concur with the FHWA that there appears to be no feasible or prudent alternative to the proposed project, if built as proposed, which would result in the loss of the eligible Section 4(f) property, the E.C. Williams House, or avoid the *de minimus* impacts to Port Huron Township Park No. 1. The Department would also concur that all measures to minimize harm to the property have been employed, under the condition that the mitigation proposed in the draft MOA is agreed to by the Michigan SHPO. A copy of the signed MOA should be attached to the final evaluation.

### **Specific Comments on the Draft EIS**

Section 3.14.3, Will the Project Impact Any Plants, Wildlife, or Threatened and Endangered Species? (pages 3.14-6 to 3.14-9): This section states, "Wildlife species that would be affected are common in the surrounding area, tolerant of noise and visual disturbances, and would easily relocate to similar habitats." This statement would seem to indicate that habitat loss does not affect wildlife. Although suitable habitat may remain in the study area, it is likely occupied by many of the same common wildlife species that would be displaced from impacted areas. There is no information provided in the draft EIS to show that these habitats presently are, or at the time of project construction are likely to be, so far below carrying capacity as to be able to absorb the displaced wildlife, assuming that individuals were able to locate and move to these other suitable habitats. This section should be corrected in the final EIS.

In addition, this section of the draft EIS does not include any discussion of potential effects to migratory birds. The preferred alternative would impact 4.36 acres of wetlands. We expect these wetland areas to provide habitat for a variety of migratory birds. Further, peregrine falcons have nested under the Black River Bridge as recently as 2005. Under the Migratory Bird Treaty Act of 1918, as amended, it is unlawful to take, capture, kill, or possess migratory birds, their nests, eggs, and young. We recommend this section in the final EIS address potential impacts to migratory birds.

Section 5.15, What Will Be Done To Ensure No Migratory Birds Will Be Impacted? (page 5-15): This section addresses mitigation measures for work on bridges over watercourses and indicates that coordination between the MDOT, the Michigan Department of Environmental Quality, and the FWS will occur. We recommend expanding this list to include other Agencies that may have review or permitting authority, for example the U.S. Army Corps of Engineers. We also recommend this section in the final EIS include a discussion of other mitigation measures, such as scheduling construction activities or removing potential habitat before the initiation of spring nesting or after the breeding season has ended to avoid take of migratory birds, eggs, young, and/or active nests. We recommend including these mitigation measures in the Project Mitigation Summary "Green Sheet."

The Department has a continuing interest in working with FHWA and MDOT to ensure impacts to resources of concern to the Department are adequately addressed. For matters related to Section 4(f), please contact Regional Environmental Coordinator Nick Chevance, National Park Service, Midwest Regional Office, 601 Riverfront Drive, Omaha, Nebraska 68102, telephone 402-661-1844. For matters related to fish and wildlife resources, please continue to coordinate with Mr. Craig Czarnecki, Field Supervisor, or Ms. Barbara Hosler, Project Biologist, Ecological Services Field Office, U.S. Fish and Wildlife Service, 2651 Coolidge Road, Suite 101, East Lansing, Michigan 48823-6316, telephone 517-351-2555.

We appreciate the opportunity to provide these comments.

Sincerely,



Willie R. Taylor  
Director, Office of Environmental  
Policy and Compliance

cc:

Mr. David E. Wresinski, Administrator  
Project Planning Division  
Michigan Department of Transportation  
425 West Ottawa Street  
Lansing, Michigan 48909



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

**Detroit Airports District Office  
11677 South Wayne Road  
Suite 107  
Romulus, MI 48174**

November 5, 2007

David W Wresinski Administrator  
Project Planning Division  
Bureau of Transportation Planning  
Murray D. Wagoner Building  
P.O. Box 30050  
Lansing MI 48909

Dear Mr. Wresinski:

Blue Water Bridge Plaza Study  
St. Clair County, Michigan  
Review of Draft Environmental Impact Statement

With respect to your study the Federal Aviation Administration (FAA) has completed its review and has only one comment. If any replacement wetlands are to be located within 10,000' from a public use airport additional coordination with the FAA will be required to ensure that the proposed mitigation site does not adversely impact air safety.

If you have any questions please contact me at (734) 229-2905. We thank you for the opportunity to review this study. We also are impressed by the "reader-friendly" format of the study.

Sincerely,

O/s

Ernest P. Gubry  
Environmental Protection Specialist  
Detroit Airports District Office

cc: Molly Lamrouex, MDOT/BOA  
Ryan Rizzo, FHWA

Ministry of  
Transportation

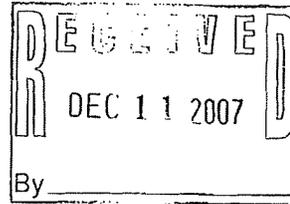
Office of the Regional Director  
Southwestern Region

659 Exeter Road  
London, Ontario N6E 1L3  
Telephone: (519) 873-4333  
Facsimile: (519) 873-4236

Ministère des  
Transports

Bureau du directeur régional  
Région du Sud-Ouest

659, chemin Exeter  
London (Ontario) N6E 1L3  
Téléphone : (519) 873-4333  
Télécopieur : (519) 873-4236



December 10, 2007

Robert H. Parsons  
Public Hearing Officer  
Project Planning Division  
Michigan Department of Transportation  
425 W. Ottawa Street  
P.O. Box 30050  
Lansing, Michigan  
48909

Dear Mr. Parsons:

**RE:** Blue Water Bridge Plaza Study  
Draft Environmental Impact Statement

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Improving the Blue Water Bridge border crossing is important to Ontario. This crossing is the fourth busiest in the province and carries the second highest volume of commercial traffic between Ontario and the United States. We appreciate the Michigan Department of Transportation including ministry staff on their advisory committee for the Blue Water Bridge Plaza Study and welcome this opportunity to comment.

Customs processing capacity at the current plaza has had and continues to have a significant impact on the operations of Highway 402 within Canada. Passenger car and truck queues form on the westbound lanes of Highway 402 when the arrival rate of U.S.-bound traffic exceeds the processing rate at the Blue Water Bridge Plaza in Port Huron. This has created a number of concerns for the traveling public and the community including:

1. Safety – Traffic queues are a significant safety risk to travelers from three aspects; rear end collisions by high speed traffic approaching the end of a queue, collisions related to lane changes due to the speed differential between lanes and limited visibility created by queued traffic.
2. Access to and from the highway – Queued trucks form a “wall” making it difficult to read signage and enter and exit the highway at the interchanges.
3. Environmental concerns –including air quality and noise concerns as a direct result of the queued traffic.

.../2

In response to these issues, the ministry has implemented a number of measures including:

- Constructed a queue warning system on Highway 402 at a cost of \$4.3 million,
- Lowered the speed limit from 100km/h to 80km/h followed by 70 km/h as you approach the border, and
- Added a gate at the Front Street interchange that is closed when there is significant traffic queuing on Highway 402.

In addition, the ministry has completed an Engineering and Environmental Assessment (EA) study to improve safety and traffic flow on Highway 402 approaching the Blue Water Bridge. We are currently working towards obtaining EA clearance to proceed with detail design and construction to widen the highway (4 westbound lanes) and separate cars and trucks as they approach the border.

The above measures are considered as interim steps to manage the queues that form on Highway 402. We feel that the solution is to move toward eliminating the queues on Highway 402 by increasing the processing capacity of the plaza in Port Huron so that the processing rate will more closely align with the arrival rate at the Blue Water Bridge.

We believe that the preferred alternative presented in the DEIS will significantly increase processing capacity at this crossing and result in traffic queues approaching the border being eliminated for all but the highest security conditions. We would encourage the Michigan Department of Transportation to proceed expeditiously with the implementation of the plaza improvements.

Yours truly,



Brian L. Pettier  
Regional Director  
Southwestern Region



Pont Blue  
Water Canada

1 Bridge Street · Point Edward, Ontario Canada · N7V 4J5  
Tel: (519) 336-2720 · Fax: (519) 336-7622 · Website: [www.bwba.org](http://www.bwba.org)

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Robert Parsons  
Public Hearings Officer  
Bureau of Transportation Planning  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, Michigan 48909

November 9, 2007

**Re: Comments on Blue Water Bridge Plaza Draft Environmental Impact Statement**

Please be advised that the Blue Water Bridge Authority's name has recently changed to Blue Water Bridge Canada (BWBC) and therefore all future correspondence should reflect this name change.

Blue Water Bridge Canada is pleased to comment on the Blue Water Bridge Plaza Study - St. Clair County, Michigan – Draft Environmental Impact Statement. BWBC has reviewed the draft Environmental Impact Statement documenting the study assessing the purpose and needs to the improvements required on the Blue Water Bridge Plaza for the foreseeable future.

The BWBC agrees with the Study Team's decision that the "No Build" Alternative does not address the primary purpose and needs identified for improvements required to the plaza. The existing US plaza configuration causes fundamental constraints inconsistent with good traffic flow management. Trucks are forced to weave from the right lane leaving Canada to the left lane entering the United States due to the existing location of the US Plaza truck primary inspection booths on the US plaza. After clearing the US primary lanes trucks must return to the right lane exiting the US Plaza. The "No Build" Alternative does not have the infrastructure in place to meet the proposed traffic volumes projected for this border crossing. The "No Build" Alternative also presents challenges for the US in regards to long term maintenance of existing single line ramps and would not include the replacement of the Black River Bridge which is a critical piece of infrastructure for this international crossing.

The "Township" Alternative presents concerns with safety and security in the creation of a dedicated corridor from the bridge to the proposed plaza. One of the concerns would be access for emergency response vehicles in the event of an incident in the corridor as well as the safety of emergency response personnel, truckers or any one else trapped in the corridor at the time of the incident. Similar concerns were identified in the marshalling yard alternative of the Ontario Ministry of Transportation's Environment Study, assessing the Need and Feasibility of widening the Highway 402.

This "Township" alternative also would create problems for cross border users travelling to destinations north of or near the existing plaza reducing the likelihood of short stops at local businesses in the area.

The "City East" Alternative relocates Pine Grove Avenue to 10<sup>th</sup> Avenue leaving a high traffic volume roadway running underneath the Blue Water Bridge Spans. This alternative is problematic due to the close proximity of the spans to the roadway it leaves the structure vulnerable to a terrorist action.

BWBC and MDOT must make every effort to reduce the risk for potential terrorist action against the structures where ever possible. The BWBC does not support this alternative based on this safety and security concern by itself.

**BWBC is supportive of the "City West Alternative" as we believe it best meets the purpose and need of the study.**

**Improvements to the plaza will increase the competitiveness of U.S. companies trading with Canada.** The United States and Canada are each others largest trading partners. 70% of this trade moves by truck. The Blue Water Bridge is the second busiest commercial truck crossing on the Canada U.S. border. 55% of all Canadian exports to the U.S. are bound for manufacturing facilities in the U.S. 25% of trade crossing this port of entry are auto or auto related shipments where just in time inventory is a crucial element in the production process.

**The "City West Alternative" will improve border processing and reduce congestion and accommodate projected traffic growth through 2030.** The summer of 2007 has demonstrated the need for an expanded U.S. plaza. While U.S. bound traffic volumes were lower compared to the same period last year, delays in processing both commercial and passenger vehicles often exceeded 2 hours and at times were reported as 3 hours or more. The inadequacies of the present facility were a major factor in the inability for Customs and Border Protection (CBP) officials to process these vehicles in a timely manner. In particular the lack of inspection booths and secondary processing facilities restrict the ability of CBP to open more lanes when required. The preferred alternative with 20 Primary Inspection Lanes (PILS) which should all be multi purpose (ability to process cars and trucks) will improve the ability for CBP to not only process more vehicles but also allow for lanes to be adjusted according to the type of traffic crossing at any particular time. The ability to add up to 10 additional PILS in the future assures that projected traffic growth in the future can be accommodated.

**Changes to I-94/I69 Corridor Will Improve Safety and Reduce Congestion.** Dedicated international lanes across the Black River will improve safety as it reduces weaving movements between trucks and cars bound for Canada. The designated lane for FAST and NEXUS participants will expedite their movements to and across the border resulting in less congestion and environmental issues. The new plaza will also reduce congestion and safety concerns on the Highway 402 approach to the Blue Water Bridge in Canada. Numerous collisions, including fatalities have occurred when westbound Highway 402 vehicles have collided with queued vehicles waiting to access the bridge.

**Traffic Weave Will Be Eliminated.** BWBC is pleased to note that the "City West Alternative" is designed so that commercial trucks entering the United States will be processed on the right side of the plaza. BWBC was required to implement a temporary "merge" as a safety precaution at the base of its span in order to eliminate the dangerous weave movements required by U.S. truck and cars after the last modifications to the U.S. plaza. The new U.S. plaza design will allow BWBC to remove this restriction and allow for a more free flow of traffic.

**Constructability and Impacts During Construction.** BWBC is pleased to note that the study team has considered the impacts of construction on existing plaza operations. BWBC is committed to work closely with MDOT and CBP to ensure that construction is as minimally disruptive as possible.

The "City West" Alternative adequately addresses all the major reasons identified for the plaza improvements. It also enhances the safety and security of the facility which reduces the vulnerabilities of the plaza to a terrorist incident.

BWBC support the City West Alternative because it addresses the fundamental existing constraints on the Canadian Side of the plaza as well as creating the safest possible environment for the asset. This is critical to both our economies.

BWBC congratulates MDOT on the comprehensive study conducted to determine the best possible infrastructure to meet the existing and future challenges faced by Border Operating Authorities. This preferred alternative includes the flexibility to address changing priorities while maintaining the security necessary to protect its infrastructure.

BWBC concludes that MDOT has completed its responsibilities in its environmental impact statement for the purpose of which it set out to do. BWBC encourage MDOT to proceed into the implementation stage without delay.

Stan Korosec  
Vice President/Operations  
Vice Président/Operations  
Blue Water Bridge Canada  
Pont Blue Water Canada  
519-336-2720 ext. 295  
Email/Courriel : skorosec@bwba.org



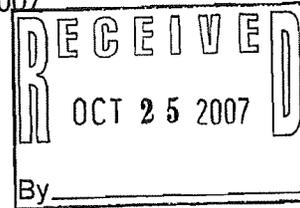
JENNIFER M. GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF AGRICULTURE  
LANSING

DON KOIVISTO  
DIRECTOR

October 16, 2007

Mr. David W. Wresinski, Administrator  
Project Planning Division  
Bureau of Transportation Planning  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, MI 48909



Dear Mr. Wresinski:

RE: Blue Water Bridge Plaza DEIS

I received your request for comment on the Draft Environmental Impact Statement for the proposed Blue Water Bridge Plaza in St. Clair County. I have reviewed the proposal alternatives with Michigan Department of Agriculture (MDA) staff.

Our primary concern, as it relates to this project would be potential impacts the project could have on properties enrolled under Part 361 of the Natural Resources and Environmental Protection Act (NREPA), Public Act 451 of 1994, as amended (formerly Public Act 116 of 1974, the Farmland and Open Space Preservation Act), and on established county and inter-county drains. As noted in earlier correspondence, staff does not anticipate impacts on these lands or infrastructure; nor do we anticipate other Social, Economic and/or Environmental impacts from the project alternatives, as they relate to agriculture and the various functions of the Department.

We do, however, have some vested interest in seeing that the requirements for an adequate inspection facility are met, as requested by USDA Animal and Plant Inspection Service, Plant Protection and Quarantine (USDA-APHIS, PPQ). While MDA is not the primary agency overseeing transnational boundary inspection of incoming food and fiber, it is the agency that is responsible for long-term repercussions if an animal or plant pest, disease or other pathogen, is introduced to the state and its citizenry due to inadequate screening facilities. In view of that, we encourage you to continue to work closely with USDA-APHIS in developing an inspection station to meet their needs.

We appreciate being included in this NEPA Process. Feel free to contact me at 517-241-3933, if you have additional questions.

Sincerely,

Abigail S. Eaton  
Resource Specialist  
Environmental Stewardship Division



STATE OF MICHIGAN

DEPARTMENT OF COMMUNITY HEALTH  
LANSING

JENNIFER M. GRANHOLM  
GOVERNOR

JANET OLSZEWSKI  
DIRECTOR

October 17, 2007

Mr. David W. Wresinski  
Department of Transportation  
Project Planning Division  
Bureau of Transportation Planning  
P.O. Box 30050  
Lansing, MI 48909

RE: Blue Water Bridge Plaza Study

Dear Mr. Wresinski:

This letter is in response to your letter dated September 7, 2007 requesting comments relevant to the Blue Water Bridge Plaza Study.

We have determined that there are no healthcare facilities within the study area. There are a few healthcare facilities within a half mile of the study area but based on our research, we believe that any of the alternatives for the proposed Blue Water Bridge Plaza Expansion should have no impact on these or any other healthcare facilities under our jurisdiction.

Access routes for emergency vehicles to the hospital during construction are a concern. However, this concern was addressed in Chapter 3 on page 3.21-3. This page states that MDOT will coordinate with emergency service providers prior to the beginning of construction and at the beginning of new phases of construction. Communication will be maintained throughout construction and adjustments will be developed based on project activity.

Should you have any questions regarding this subject, please feel free to contact our staff member Jay Calewatts, Engineer, at 517-335-6960.

Sincerely,

Nick Lyon  
Acting Deputy Director, Health Policy  
Regulation and Professions Administration

cc: James D. Scott, P.E., HFES

NL/mw

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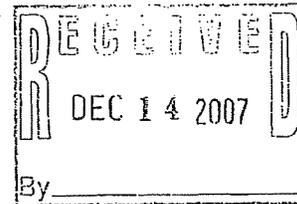
STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



JENNIFER M. GRANHOLM  
GOVERNOR

STEVEN E. CHESTER  
DIRECTOR

December 10, 2007



Mr. David E. Wresinski, Administrator  
Project Planning Division  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, Michigan 48909

Dear Mr. Wresinski:

**SUBJECT: Draft Environmental Impact Statement (DEIS)-Blue Water Bridge Plaza Study  
St. Clair County Michigan**

The Michigan Department of Environmental Quality (MDEQ), Land and Water Management Division (LWMD), has completed review of the DEIS for the Blue Water Bridge Plaza Study, St. Clair County Michigan.

The purpose of the proposed project is to:

- Provide safe, efficient and secure movement of people and goods across the Canadian-U.S. border in the Port Huron Area to support the economies of Michigan, Ontario, Canada and the United States.
- Support the mobility and security associated with needs of national and civil defense.

The alternatives include:

- No Build
- City East Alternative
- City West Alternative
- Township Alternative

The DEIS indicates that while a final determination has not been made, the City West Alternative is preferred at this time. All three build alternatives include the replacement of the existing 4 lane Black River Bridge with a 9-lane bridge; updated interchanges at Water Street and the Lapeer Connector; and a relocated welcome center in Port Huron Township. Potential relocations range from 56 residences and 29 businesses to 155 residences and 34 businesses for the three build alternatives

The LWMD has the following comments:

- 1) Wetland impacts range from 4.4 acres for the City East and City West alternatives to 10.4 acres for the Township alternative. A permit for these impacts will be required from LWMD, under Part 303, Wetlands Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA).
- 2) Page E-19 Wetlands-states that replacement ratios for forested impacts are 10:1, and the ratios for emergent, scrub/shrub and open water are 2:1

Under Part 303, the replacement ratios are 2:1 for forested wetlands and 1.5:1 for emergent scrub/shrub wetlands.

*Copy to m. Webb  
12-17-07  
SK*

- 3) The bridge crossing at Black River and the culvert crossing of Stocks creek will be replaced. A permit will be required from the LWMD under Part 301, Inland Lakes and Streams and Part 31, Water Resources Protection, of the NREPA.
- 4) Page 3.11-3 Stocks Creek-states that the existing 200 foot long triple 6 foot diameter culverts will be replaced with a 210 foot long 12 foot by 8 foot elliptical concrete culvert.  
The MDOT should consult with the LWMD and the Michigan Department of Natural Resource to ensure the proper sizing of this crossing to allow for adequate fish passage.
- 5) Page 3.11-6 City East Alternative states that an oil separator system would be used to provide pollutant removal (oil and solids) from the stormwater.  
This mitigation component should be added to the mitigation Green Sheet.
- 6) Page 3.12-1 Floodplains. It is recommended that paragraphs 2 and 4 be re-worded as follows.  
  
Paragraph 2-The floodplain is divided into two parts, the floodway which carries most of the flow during a flood event, and the floodway fringe which is an area of very slow moving water or "slack water". **The floodway is the high hazard area during times of flooding.**  
  
Paragraph 4-The State of Michigan's Floodplain Regulatory Authority, found in Part 31, Water Resources Protection, **of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA)** requires that a permit be obtained prior to any alteration or occupation of the 100-year floodplain of a **stream /drain with a drainage area of 2 square miles or more**. The purpose of Part 31 is to assure that **projects** do not obstruct the flow of water and **cause a harmful interference** in the 100-year floodplain and that **the floodway** portion of the floodplain is not used for residential construction. **Part 31 is enforced by** the Michigan Department of Environmental Quality.
- 7) Page 3.13-6- Figures 3.13.1 and 3.13.2-The figures are confusing in that part of the wetlands are shown in yellow and part are in blue along Stocks Creek.

If you have any questions please contact Mr. Alex Sanchez at 517-335-3473 or you may contact me.

Sincerely,



Gerald W. Fulcher, Jr., P.E., Chief  
Transportation and Flood Hazard Unit  
Land and Water Management Division  
517-335-3172

cc: Mr. David Williams, U.S. Federal Highway Administration  
Ms. Sherry Kamke, U.S. Environmental Protection Agency  
Mr. Craig Czarnecki, U.S. Fish and Wildlife Service  
Mr. John Konik, U.S. Army Corps of Engineers  
Mr. Andrew Hartz, MDEQ  
Mr. Alex Sanchez, MDEQ

**SEMCOG**... Local Governments Advancing Southeast Michigan

Southeast Michigan Council of Governments • 535 Griswold Street, Suite 300 • Detroit, Michigan 48226-3602 • 313-961-4266 • Fax 313-961-4869  
www.semco.org

December 6, 2007

Todd -  
FYI more  
Comments  
- Matt

Mr. Bob Parsons  
Public Hearings Officer  
Michigan Department of Transportation  
PO Box 30050  
Lansing, MI 48909

Re: Review of the Blue Water Bridge Plaza Study Draft Environment Impact Statement

Dear Mr. Parsons:

SEMCOG has reviewed the Draft Environmental Impact Statement (DEIS) for the "Blue Water Bridge Plaza Study" provided by Michigan Department of Transportation and its consultants. As part of this review, we consulted with St. Clair County, local communities and the Michigan Department of Transportation and its consultants.

Attached is the memorandum that summarizes SEMCOG's review of the DEIS. In general, we believe the DEIS does a good job of identifying the impacts of the proposed project. However in some instances, we feel additional information/analysis is needed.

I hope our comments assist you with moving this project forward. We are looking forward to being actively involved in the future stages of the project. If you have any questions, please contact us at (313) 961-4266.

Sincerely,

Carmine Palombo, P.E., Director  
Transportation Programs

cc: William Kauffman, St. Clair County Metro Planning Commission

Enclosure

CP:sm

William T. Roberts  
Chairperson  
Mayor,  
City of Walled Lake

Mary Blackmon  
First Vice Chair  
Trustee, Wayne County  
Regional Education  
Service Agency

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Ira Township

Paul E. Tall  
Executive Director

**SEMCOG**  
**MEMO**

Southeast Michigan Council of Governments  
535 Griswold Street, Suite 300  
Detroit, Michigan 48226  
(313) 961-4266  
Fax (313) 961-4869  
[www.semco.org](http://www.semco.org)

December 4, 2007

TO: Carmine Palombo

FROM: Transportation Staff

SUBJECT: Review of Blue Water Bridge Plaza Study Draft Environmental Impact Statement

The Blue Water Bridge is a major border crossing of people and goods between the United States and Canada. The bridge and the plaza both serve both national and international needs. While the construction and operation of the new Blue Water Bridge Plaza will provide for improved accessibility and security for border crossing, it will have impacts on the City of Port Huron and the local area adjacent to the plaza that need to be addressed.

**Introduction**

SEMCOG has reviewed the Draft Environmental Impact Statement (DEIS) for the "*Blue Water Bridge Plaza Study*" provided by Michigan Department of Transportation and its consultants. The DEIS was reviewed for its consistency with the SEMCOG adopted 2030 Southeast Michigan Regional Transportation Plan goals and objectives and SEMCOG policies. This memorandum contains some general comments, as well as some specific questions or concerns that arose during review. Specific elements of the DEIS reviewed were: air quality findings (Section 3.9); traffic impact study; Environmental Justice (Section 3.3); and Storm Water (Section 3.11).

The DEIS analyzed and compared four alternatives for improvements to the Blue Water Bridge Plaza and the I-94/I-69 corridor.

No build alternative: The no-build alternative would not require any expansion to the plaza or I-94/I-69 corridor.

City East Alternative: The City East Alternative would require the expansion of the plaza in the City of Port Huron and would relocate Pine Grove Avenue to the east and make improvements along the I-94/I-69 corridor.

City West (Preferred Alternative): The City West Alternative would require the expansion of the plaza in the City of Port Huron and would relocate Pine Grove Avenue to the west and make improvements along the I-94/I-69 corridor.

Review of Blue Water Bridge Plaza Study  
Draft Environmental Impact Statement  
Page 2

Township Alternative: The Township Alternative would relocate most plaza functions to the plaza in Port Huron Township and make improvements along the I-94/I-69 corridor.

#### **Review Comments**

Responses to the DEIS are based on SEMCOG review and questions and concerns raised by St. Clair County and the communities.

In general, the DEIS does a good job of addressing potential impacts regarding air quality, environmental justice, traffic impact and storm water drainage but lacks detail in some critical areas. Comments follow under the appropriate subject headings.

#### Air Quality

- In general, all of the proposed alternatives should result in reduced congestion and idling at the Blue Water Bridge and thus provide better air quality than would be experienced under a do-nothing scenario. However, more detailed information, directly comparing the different alternatives, would provide a better understanding of the relative benefits and negative impacts of each alternative in relation to the others.

#### Section 3.9.1: Current Air Quality Status

- Current air quality status should focus on Southeast Michigan and St. Clair County rather than the entire state. It should talk about monitored levels of ozone and PM2.5 (annual and 24-hour) in St. Clair County compared to other parts of the region and note recent trends in the data. There is concern over more idling concentrated in the plaza and roads heading to the plaza all of which currently occur in Canada.
- Reference should be made on the most recent emissions inventory data for these pollutants, not the data in the State's 2005 Annual Air Quality Report. Attached are tables showing MDEQ's latest ozone emissions inventories for St. Clair County and the entire SEMCOG Region. Also enclosed is SEMCOG's latest on-road mobile source emissions inventory for PM2.5. MDEQ is in the process of developing emissions inventories for the other PM2.5 source categories (point, area & off-road). Contact John Schroeder ([jschroeder@michigan.gov](mailto:jschroeder@michigan.gov)) to see if this data is available for inclusion in the document.
- With regard to Regional Transportation Conformity analysis, an early alternative of the Blue Water Bridge Plaza study was included in the conformity demonstration of SEMCOG's 2030 Regional Transportation Plan (RTP). SEMCOG is updating its transportation model network to reflect the currently preferred alternative (City West) and will include this project in its next conformity analysis. The preferred alternative is expected to meet regional conformity requirements. The analysis will be completed in March 2008.

Review of Blue Water Bridge Plaza Study  
Draft Environmental Impact Statement  
Page 3

3.9.3: Impact of Particulates

- SEMCOG agrees that a PM2.5 hotspot analysis should be performed on the preferred alternative, following the federal guidance that was issued by EPA and FHWA in March 2006.

3.9.4: Impact of Mobile Source Air Toxics (MSAT)

- While validated models for predicting MSAT pollutant concentrations are not yet available, pollutant burdens can be quantified and compared between alternatives. We believe that a Tier 3 analysis, as described in FHWA's 2006 *Interim Guidance on Air Toxic Analysis in NEPA Documents*, is appropriate for this project due to the high level of truck traffic associated with the bridge plaza and the level of community concern regarding the project. Such an analysis would help the effected communities better understand and evaluate the different alternatives, particularly in relation to the Do-Nothing scenario. While overall traffic volumes will be roughly the same between the different alternatives, the changes in traffic speed and associated idling will create differences in emission levels. Providing a pollutant burden table that shows these differences would give a better understanding of the relative impacts of the different alternatives.

Air Pollution Mitigation

- The report states that "implementation of a construction emissions reduction plan may be considered" and lists a number of actions that may be included in this plan. The DEIS does not indicate if such a plan is to be implemented and when that decision will be made?
- The section on Off-Road Construction Equipment references Tier 2 standards for non-road equipment. However, stricter Tier 3 standards began taking effect in 2006 and will be fully phased in by 2008. These are the standards that should be met for off-road construction equipment.

Traffic Impacts

All of the build alternatives are preferable to the no-build alternative from a traffic impact perspective. The traffic impacts on all of the build alternatives are comparable. Following is a synopsis of the DEIS traffic impact findings followed by SEMCOG's comments:

No build alternative: This alternative would result in the highest congestion problems (greater than 55 seconds delay per vehicle) for some of the local street intersections and freeway segments congestion (greater than 88% of capacity).

Review of Blue Water Bridge Plaza Study  
Draft Environmental Impact Statement  
Page 4

City East Alternative: This alternative would experience moderate levels of congestion (21 to 55 seconds delay per vehicle) for some of its critical intersections and low levels of congestion (0 to 47% capacity) for all of the freeway intersections. The ramps would experience moderate congestion (48 to 88% of capacity).

City West (Preferred Alternative): This alternative would experience moderate levels of congestion (21 to 55 seconds delay per vehicle) for some of its critical intersections and only two freeway segments would experience moderate levels of congestion (48 to 88 % of capacity).

Township Alternative: This alternative would experience moderate levels of congestion (21 to 55 seconds delay per vehicle) for all of the intersections and low to moderate levels of congestion (48% to 88% of capacity) for freeway and arterial segments.

- Based on the conclusion from the DEIS, the City West preferred alternative would improve the flow of traffic and would provide adequate capacity for current and future traffic on local roads, freeway segments, and mobility through the plaza resulting in less vehicle queues and backups on the freeway network.
- The City West preferred alternative adequately meets all of the requirements developed and identified in Table 2.3.1 Summary of Alternative Evaluation. The preferred alternative would address the potential congestion problem along the M-25 corridor by improving the intersection capacity, adjusting traffic signal operations, adding turn lanes, and/or adding through lanes until low to moderate levels of congestion are achieved.
- The planned modification to the existing I-94/I-69 Bridge over the Black River widens it from four (4) lanes to nine (9) lanes through the preferred alternative. This improvement to capacity is expected to overcome the need for additional crossing over the Black River. However, there is question whether this capacity improvement does in fact address local community concerns. Further consultation is needed with community officials to address these concerns.
- Roundabout Safety: Appropriate use of roundabouts should be analyzed carefully and should be able to provide adequate capacity for future traffic. Roundabouts are considered as a viable option for some of the existing or new intersections needed for the proposed improvements. Roundabouts are gaining popularity in United States, and are seen as an efficient way to manage traffic flow and improve safety at intersections.
- ITS Technology: The study team has identified the use of inspection technologies for safe and efficient movement, especially for truck traffic. These technologies include Gamma Ray Inspection Technology (GRIT) and radiation portal detectors.

Review of Blue Water Bridge Plaza Study  
Draft Environmental Impact Statement  
Page 5

- Traffic Forecast: It has been determined by the study team that bridge security, not traffic volumes, is the driving factor in the design of the plaza. The Traffic Analysis Report includes a high and low range traffic forecast, and is able to acknowledge the recent change in traffic volumes experienced at the bridge.
- Local Road Traffic Impacts: The DEIS does an adequate analysis of the freeway system, but needs clarification on number of items particularly to local roads and community impact. The key issues identified are as follows:
  - A corridor traffic progression analysis should be performed and provided in the Final Environmental Impact Statement since the preferred alternative would add two new signalized intersections and a roundabout (see Table 2.2.4) along Pine Grove Avenue. A stronger effort is needed to time the signals along Pine Grove Avenue, which continues to be a problem.
  - The impact of introducing signalized intersections and a roundabout within close proximity to each other should be discussed.
  - On page 2.2-20, it is mentioned that certain roadway segments will not be able to meet design standards for curve length, radii and design speed, the study should clarify how the potential safety and performance issues will be addressed. Access management and other techniques should be applied to help address such issues.
  - The report should clearly indicate the individual street that will be closed as a result of the preferred alternative, as this would be a major connectivity issue for neighborhood around the plaza, particularly along 10<sup>th</sup> Avenue. The potential increase in traffic along 10<sup>th</sup> Avenue and the intersection of 10<sup>th</sup> Avenue and Hancock Street should also be considered in analysis.
  - On page 2.2-32, the report needs to specify type of intersection control proposed for the intersection of Lapeer Connector with the collector road.
  - On page E-25 (Figure E.16), the symbols that correlate to the legend appear to change in size. If different sizes indicate difference in features or performance measures, please explain, otherwise correct graphic.

Non-motorized Corridor Over The Black River: The DEIS does not acknowledge receipt of the non-motorized trail plan developed by St. Clair County Parks and Recreation. The plan was developed in collaboration with County Parks, Port Huron Township Supervisor, Port Huron City Engineer, and the Port Huron City Planner. The plan contains a City of Port Huron and Port Huron Township proposal for a non-motorized traffic bridge over the Black River connecting to Water Street on the west side and the Bridge to Bay Trail

on the east side. The final EIS should reference the trails plan and indicate that the provision of a non-motorized crossing will move forward in the next stages of the project.

#### Economic Benefits

Construction and other related jobs would be created as a result of the plaza project. The study team estimates that 4,220 short-term construction jobs would be available over a 5-year construction period. All of the build alternatives would reduce future congestion at the border crossing providing positive economic benefits to trucking firms and other companies and individuals involved in border crossing trade.

The preferred alternative could decrease cost of travel to motorists, as congestion and delay would be reduced by the improvements. It has been identified in the DEIS that future traffic growth at the Blue Water Bridge will depend more on the economic conditions across the United States than local or regional economic growth.

The large plaza footprint has an impact on both the residents and businesses in the area. What are the implications on tax revenues (property tax base, income tax, and school tax) from the loss of residences, businesses, and school-age children? Further, what demands does the facility place on emergency first responders.

The five-year construction time-period will cause disruption to adjacent residents and businesses. What efforts will be undertaken to mitigate such disruption?

#### Welcome Center

It has been determined that the Welcome Center would not be constructed in the median of the I-94/I-69 freeway as originally discussed, because of safety concerns and parking requirements. The build alternatives propose a new Welcome Center on vacant land in Port Huron Township approximately one mile west of its current location that is better suited to meet MDOT's design standards. It has also been identified in the study that MDOT will hold a public meeting to develop design aesthetics and landscaping treatments for the new Welcome Center. The public meeting should also include design aesthetics and landscaping treatments in and around the plaza itself.

#### Environmental Justice

There appears to be no disproportionately high environmental impacts on minorities and/or low-income populations from the preferred alternative. The impacts from the preferred alternative would be similar for all groups regardless of demographic or socioeconomic characteristics of the community.

MDOT has indicated that they will provide purchasing, relocation assistance and advisory services for anyone whose property is needed for the project. However, concerning properties not taken by the new plaza, the project will reduce neighborhood cohesion in the blocks surrounding the existing plaza. That area would be divided as a result of the plaza expansion

Review of Blue Water Bridge Plaza Study  
Draft Environmental Impact Statement  
Page 7

causing several local businesses to be relocated. This division of the neighborhood could potentially present a challenge to the local low-income population to find sufficient alternatives to the departed businesses of comparable types.

#### Storm Water

Any transportation facility of this magnitude will result in potential storm water runoff concerns. The existing plaza (no build alternative) does result in untreated stormwater entering our water resources. Therefore, the alternative scenarios provide an opportunity to incorporate stormwater management into the site design.

The build alternative scenarios make reference that the runoff would be treated prior to entering the waterbody. However, more information on the detailed stormwater management techniques should be provided. The following information reflects the requirements often found in a stormwater ordinance and should be incorporated into the design of the project:

- There will be no direct discharges of stormwater runoff to the receiving water.
- The runoff from the project will equal presettlement runoff rates.
- Native vegetation will be used in all plantings.
- Ensure the proper vegetation type and amount in the grassy buffer areas to ensure that erosion does not occur from overland flow.
- Invasive species will be removed from the site.
- Keep the natural drainage ways intact.
- Infiltration and Low Impact Development (LID) practices will be utilized, when feasible based on appropriate soils, locations, and pollutant removals. This includes porous pavement in low traffic volume areas, bioswales along roads, and bioretention in parking lots.
- Public education signage for LID techniques should be incorporated into the site.

SEMCOG is in the process of developing a LID manual for Michigan. It will be completed in May 2008 and will be able to provide details on how to design LID techniques.

## Southeast Michigan Ozone Emissions Inventory

### Volatile Organic Compounds (VOC)

Tons/Summer Day

Geographic Area	Year	Source				
		Point	Area	On-Road Mobile	Off-Road Mobile	Total
St. Clair County	2005	5.55	5.20	4.70	11.35	26.80
	2009	4.40	7.53	3.50	10.32	25.75
	2018	5.54	7.93	2.10	8.94	24.51
SEMCOG Region	2005	62.48	220.37	126.10	152.43	561.38
	2009	51.20	207.10	93.30	127.41	479.01
	2018	60.15	215.82	53.00	111.28	440.25

Source: Michigan Department of Environmental Quality, *Request to Redesignate to Attainment Status: Southeast Michigan Counties of Lenawee, Livingston, Macomb, Monroe, Oakland, St. Clair, Washtenaw, and Wayne, 2007.*

### Nitrogen Oxides (NOx)

Tons/Summer Day

Geographic Area	Year	Source				
		Point	Area	On-Road Mobile	Off-Road Mobile	Off-Road Mobile
St. Clair County	2005	80.88	0.67	11.60	7.83	100.98
	2009	69.71	0.99	7.80	6.54	85.04
	2018	73.08	1.02	3.00	5.69	82.79
SEMCOG Region	2005	266.58	15.50	336.40	119.77	737.25
	2009	186.86	25.55	222.80	97.68	532.89
	2018	194.64	26.38	80.50	67.57	369.09

Source: Michigan Department of Environmental Quality, *Request to Redesignate to Attainment Status: Southeast Michigan Counties of Lenawee, Livingston, Macomb, Monroe, Oakland, St. Clair, Washtenaw, and Wayne, 2007.*

## Southeast Michigan Fine Particulate Matter (PM2.5)

### On-Road Mobile Source Emissions Inventory

Tons/Year

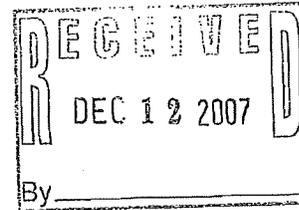
Scenario	Emissions		Associated Annual VMT (in millions)
	Primary PM2.5	NOx	
2002	2,766	151,540	46,496
2010	1,348	68,467	49,170
2020	799	23,123	51,726
2030	762	15,458	53,803

Source: SEMCOG, *Fine Particulate Matter (PM2.5) Conformity Analysis of the Proposed Amendment of SEMCOG's 2030 Regional Transportation Plan for Southeast Michigan, October 31, 2007.*

# United States Senate

WASHINGTON, DC 20510

December 10, 2007



Mr. Bob Parsons  
Public Hearings Office, MDOT  
P.O. Box 30050  
Lansing, Michigan 48909

Dear Mr. Parsons:

We are writing to express our concerns regarding the Blue Water Bridge Plaza Draft Environmental Impact Statement.

As you know, the Community of Port Huron has continued to raise many concerns and questions regarding this expansion project. Community leaders acknowledge the legitimate need to enhance border security and improve traffic flow at the bridge, and have been working closely with all the federal and state agencies involved. They have a legitimate interest in the impact this expansion will have on the residents and businesses.

However, at this stage of the process we are very concerned about the number of outstanding questions and unresolved issues raised by the City and County related to the justification of the scope of the project and the thoroughness of the Environmental Impact Statement. We encourage you to work with City and County officials to address their concerns and to explore opportunities to address the potential economic impact of the project on the surrounding communities.

We urge all the agencies involved in this project to continue to work closely with the community of Port Huron to address these serious questions and issues. As always, if we can be of assistance in any way in this process, please let us know.

Sincerely,

Handwritten signature of Carl Levin in black ink.

Carl Levin  
United States Senator

Handwritten signature of Debbie Stabenow in black ink.

Debbie Stabenow  
United States Senator

cc: Robert Perez, Customs and Border Protection

Matt Webb, MDOT

Jim Sharp, General Services Administration

Mark Lundgen, General Services Administration

CANDICE S. MILLER  
10TH DISTRICT, MICHIGAN

WASHINGTON OFFICE:  
228 CANNON HOUSE OFFICE BUILDING  
WASHINGTON, DC 20515  
12021 225-2106  
FAX: (202) 225-1169

DISTRICT OFFICE:  
48853 VAN DYKE AVENUE  
SHELBY TOWNSHIP, MI 48317  
15661 997-5010  
FAX: (586) 997-5013



COMMITTEE ON  
ARMED SERVICES  
READINESS  
AIR AND LAND

COMMITTEE ON  
TRANSPORTATION  
AND INFRASTRUCTURE  
HIGHWAYS AND TRANSIT  
WATER RESOURCES  
AND ENVIRONMENT

Congress of the United States  
House of Representatives  
Washington, DC 20515-2210

December 5, 2007

Mr. Robert H. Parsons  
Public Involvement and Hearings Officer  
Bureau of Transportation Planning  
Michigan Department of Transportation  
PO Box 30050  
Lansing, MI, 48909

Mr. Parsons:

As Michigan's 10<sup>th</sup> District representative in the U.S. House, I write to provide my comments on the Draft Environmental Impact Statement (DEIS) for the Blue Water Bridge Plaza Study.

The Blue Water Bridge Plaza Study has been an important collaboration involving local, state, and federal government agencies. A border plaza exists to perform a function that is almost contradictory: to expedite legitimate cross-border traffic while also protecting our nation against the illegal importation of people and goods in addition to protection from external threats such as terrorism. This effort involves numerous government agencies including the Michigan Department of Transportation (MDOT), Customs and Border Protection (CBP), and the Federal Highway Administration. It is imperative that a border crossing function as efficiently as possible while at the same time providing needed protections to our nation.

This study has faced many challenges over the years because of the very unique circumstances of the border crossing at Port Huron. We are faced with the need to expand the capacity of the existing plaza in a heavily urbanized area. We must also deal with the realities of border protection requirements in a post-9/11 world. Doing so in a way that is agreeable to all parties has proven to be a very difficult challenge.

This situation is not made any easier by the previous work at the plaza when the second span was built in the 1990's. Poor planning and design to adapt the plaza to serve two spans caused a dangerous weave for traffic entering the United States and made it more difficult to plan for future expansion to accommodate increasing traffic and enhanced security needs.

As this study has been taking place, I have viewed my role in this process to assist in securing federal funding and to facilitate communication between involved federal, state and local agencies. The 2005 SAFETEA-LU legislation directed \$43 million to offset the cost of this project to the state. Though I have since attempted to move a portion of this funding to other important transportation projects in St. Clair County because of the slow pace of progress in this project and my sincere desire to ensure that this money benefit the many transportation infrastructure challenges in St. Clair County, I believe it is important that the federal government continue to assist with the construction of the plaza, provided that it is done in a way that expedites crossings and security while at the same time limiting negative impacts on the community.

I have also attempted to facilitate communication among the involved agencies by having the Department of Homeland Security appoint a liaison to expedite decision making within CBP in regards to the plaza at the Blue Water Bridge. We have also brought together MDOT and key federal agencies in the same room in order to address communication problems and develop a better understanding of each agency's objectives.

Unfortunately, communication has been a problem that has plagued this project from the beginning. Of particular concern has been the inability of the affected communities to receive answers to their questions from MDOT. This project is going to have a major impact on the city of Port Huron and surrounding municipalities. Local government leaders as well as residents should be relevant participants in this process to ensure that the new facility makes as little negative impact as possible. But at this stage, local officials remain very concerned that the preferred alternative is larger than necessary, which will cause irreparable damage to their community and a deterioration of an already diminishing tax base.

The preferred alternative identified by MDOT has some very good merits. Most importantly, it satisfies each of CBP's requirements to properly inspect persons and vehicles entering the United States. The preferred alternative is large enough that it should not need any modification for several decades. The plaza also includes significant acreage for future expansion within its boundaries that allow it to handle future traffic projections.

There is no question that traffic at the Blue Water Bridge increased exponentially through the 1980s and 1990s resulting in the twinning of the bridge in 1997. As the DEIS notes, truck traffic crossing each way on the Bridge increased by more than 130% between 1990 and 2000. At the same time, passenger traffic decreased by roughly 450,000 crossings during the same period. The net increase from 1990 to 2000 was roughly 450,000 total crossings for a grand total of just under 6 million in 2000.

Yet, this total increase did not meet MDOT's traffic projections for the Blue Water Bridge which was approximately 8 million crossings in 2000, according to the Blue Water Bridge Additional Capacity Project Environmental Report in 1994. Since 2000, overall traffic has actually decreased on the Bridge despite an increase in

commercial traffic. As a result we have seen an even wider variation between the traffic projections and the actual traffic numbers.

The current plaza is simply inadequate to meet CBP's needs in a post-9/11 world. But my specific concern is that the traffic projections which have been used to develop the preferred alternative are overly optimistic about future needs. It seems that basing future traffic growth on the rapid growth of the 1980s and 1990s will inevitably result in a plaza footprint far in excess of what may actually be required. Given the slow down of the domestic auto industry, the prospect of fewer Canadian trash trucks crossing the bridge, and newer technology to speed processing times, I have serious questions about whether a plaza the size of the preferred alternative is necessary.

It seems to me that MDOT should revisit this issue of traffic projections and work with community leaders and CBP to ensure that the new plaza meets but does not greatly exceed CBP's operational necessities all of which should have a focus on limiting to the greatest extent possible its negative impact on the City of Port Huron. If I can be of assistance on this or any other matter, please do not hesitate to contact me.

Sincerely,



Candice S. Miller  
Member of Congress

**Vance, Rhonda K.**

---

**From:** Davis, Todd J  
**Sent:** Monday, December 10, 2007 4:57 PM  
**To:** Vance, Rhonda K.  
**Subject:** FW: DEIS Comments

Todd J. Davis, AICP  
Wilbur Smith Associates  
w: 517.323.0500 Ext. 104 m:517.282.7216 f: 517.323.9200 TDavis@WilburSmith.com

-----Original Message-----  
From: Bob Parsons [mailto:ParsonsB@michigan.gov]  
Sent: Monday, December 10, 2007 4:40 PM  
To: District 81  
Cc: Ronald DeCook  
Subject: Re: DEIS Comments

Dear Representative Pavlov:

Thank you for commenting on the Blue Water Bridge Plaza Study. I especially appreciate your empathy for the task of sorting through and responding to the suggestions and concerns we have received on the Draft Environmental Impact Statement. I can assure you that the study team will very carefully consider every comment and provide appropriate responses in the Final EIS. With this response, I am forwarding your comments to the study team members for review. They also will become part of the official transcript of comments received through today, December 10, 2007, the extended deadline for comments. As noted, comments will be addressed in the Final Environmental Impact Statement next spring. For further information on the study, and to review the draft document on line, please check our Web site at [www.michigan.gov/bluewaterbridgeproject](http://www.michigan.gov/bluewaterbridgeproject). Again, thank you for expressing your concerns. If I can be of further assistance, please do not hesitate to contact me.

Sincerely,

Bob Parsons

Robert H. Parsons  
Public Involvement/Hearings Officer  
Bureau of Transportation Planning  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, MI 48909  
(517) 373-9534  
parsonsb@michigan.gov

"Seek first to understand,  
then to be understood."  
Stephen R. Covey

>>> "District 81" <Dist081@house.mi.gov> 12/10/2007 3:54PM >>>

Dear Mr. Bob Parsons,

Attached are my comments on the Blue Water Bride Plaza DEIS. I have put the original in the mail today, and have copied the text below in case there are problems opening the file.

Thank you for the opportunity to comment. Please let me know if there is anything my office can do to help.

Sincerely,

Phil Pavlov  
State Representative  
81st District

Letter Text:

December 10, 2007

Mr. Bob Parsons  
Public Hearing Officer  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, MI 48909

Re: Blue Water Bridge Plaza Study - Draft Environmental Impact Statement (DEIS)

Dear Mr. Parsons:

After today you will have the difficult task of sorting through all of the public comment on the Blue Water Bridge Plaza Draft Environmental Impact Statement (DEIS). While I do not envy your task, I cannot stress enough the importance of it.

Over the last two months our community leaders have come together to identify their major problems with the DEIS. With a united voice, they summarized their issues and sent in their comments. I write today in support of their concerns related to Section 1 of the DEIS and supporting technical reports.

As mentioned, our community acknowledges that there is a legitimate need to improve the existing bridge plaza infrastructure in order to reduce processing delays, enhance security, and accommodate new technologies. However, since the new plaza will be a permanent fixture in our community, it is imperative that our concerns are addressed.

I urge you to take the time to adequately reflect upon and respond to the issues identified by our community. Please feel free to contact me at my office (1-517-373-1790) if I can be of further assistance as you continue this process.

I stand ready to work with you and all involved parties to ensure that these issues are not overlooked. Thank you for your time.

Sincerely,

PhilPavlov  
StateRepresentative  
81st District



## COUNTY OF ST. CLAIR

Office of the Administrator/Controller



SHAUN S. GRODEN  
Administrator/Controller  
sgroden@stclaircounty.org  
Phone: 810-989-6900

JENNIFER J. POSEY  
Administrative Analyst  
jposey@stclaircounty.org  
Phone: 810-989-6900

ROBERT C. KEMPF  
Deputy Controller  
Finance Director  
rkempf@stclaircounty.org  
Phone: 810-989-6905

KARRY A. HEPTING  
Accounting Manager  
khepting@stclaircounty.org  
Phone: 810-989-6905

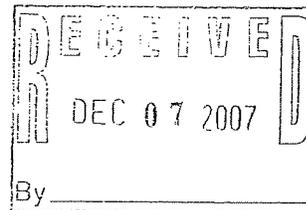
CHERYL K. PEART  
Purchasing Coordinator  
cpeart@stclaircounty.org  
Phone: 810-989-6376

OFFICE ADDRESS:  
200 Grand River Avenue  
Suite 203  
Port Huron, MI 48060  
Fax: 810-985-3463  
www.stclaircounty.org

VISION: We are the leader in  
innovative, customer-centered  
government.

MISSION: To continually  
improve public services that  
enhance the community for  
citizens and future generations  
of St. Clair County.

December 5, 2007



Mr. Bob Parsons  
Public Hearings Officer  
Michigan Department of Transportation  
PO Box 30050  
Lansing, MI 48909

Re: **Blue Water Bridge Plaza and Corridor Projects - Executive  
Summary of Review and Mitigation Issues**

Dear Mr. Parsons:

The St. Clair County Board of Commissioners and Administration acknowledge that improvements to the Blue Water Bridge Plaza and the existing corridor are necessary to enhance traffic flow and security at this critical border crossing. These projects will permanently alter our community and we have the obligation to the citizens of this County to mitigate any anticipated adverse impacts. Therefore, we have worked diligently with the County departments/agencies and the municipalities affected (including the City of Port Huron, Charter Township of Port Huron and the Charter Township of Fort Gratiot) to come to agreement on the impacts of these projects. Although each of the government entities has individual concerns about the plaza and corridor projects, we have come to a consensus on many issues, which will be outlined in this summary.

In our collaborative effort with the City of Port Huron, Township of Fort Gratiot and the Township of Port Huron, it has been agreed that the City of Port Huron shall act as the lead agent. However, each entity shall submit a listing of their concerns, questions and comments directly to Michigan Department of Transportation (MDOT). It is also the consensus of local government agencies that MDOT has failed to provide sufficient answers in the Draft Environmental Impact Statement (DEIS). The DEIS does not provide full public disclosure of impacts, does not adequately justify the project's costs/negative impacts, does not evaluate a reasonable range of alternatives and does not provide adequate and definitive mitigation for the negative impacts that are expected.

Over the course of the year and since the release of DEIS from MDOT and the Federal Highway Administration, St. Clair County departments and agencies have compiled a series of questions and concerns (attached as Exhibit A) that will need to be addressed by MDOT.

In addition to the questions/comments provided to MDOT in Exhibit A, there are several mitigation priorities that were identified by our collaboration with the other municipalities. They are outlined below:

1. The improvements to the I-69/I-94 corridor, including the Black River Bridge, must be evaluated as a separate project as previously planned by MDOT. It is imperative that we do not delay the corridor project while the plaza is being evaluated and debated. All communities agree that the plaza and the corridor projects must be separate projects.
2. The structures throughout the projects (plaza and corridor) will need to reflect the unique characteristics of the host communities. We will need input and assurances that the retaining and security walls will be aesthetically pleasing. The construction will need to soften the impact of the walls and enable the site to become a community asset. We need to have an architectural WOW!
3. There must be a definite plan on where to locate the livestock/plant inspection and quarantine facility. What are the facility plans for holding livestock? How will animal waste be disposed? Is there a quarantine facility in the plaza? If so, where is it located? If not, how will infected or diseased animals be handled?
4. Relocation of the Welcome Center that would allow easy access to return to the City of Port Huron and the Township of Fort Gratiot. As currently proposed, traffic exiting the Welcome Center would have no other option except to head in the westbound direction and would have to travel approximately 12-14 miles to return to the Blue Water Area. Travelers from both directions should have the ability to access the Welcome Center and view the opportunities and assets in the Blue Water Area. The project design must not act as an impediment to accessing those community assets. Therefore, we request that the Welcome Center be located in the center median of the I-69/I-94 Corridor. We fully understand that having the center median would require the posted speed limit to be lowered to 55 miles per hour.
5. Sufficient ingress/egress must be provided in the construction zone for emergency routes for law enforcement, fire and EMS. The primary hospitals are south of the construction zone and there are numerous businesses and facilities, such as nursing homes, north of the construction zone. We cannot jeopardize the response time of our emergency responders. We need to see plans and designs for multiple

points of access for emergency responders to the hospitals, senior living facilities, and evacuation routing in general through the footprint of the plaza accommodating users that may be north of the plaza.

6. We need our federal and state legislators to publicly voice their opinions on these projects, including draft, design and submit public comments.
7. It is necessary for MDOT to officially recognize the M-25 alternate route and work with the local road agency to contribute the resources necessary for long-term maintenance of this alternate route.

City of Port Huron, Township of Fort Gratiot, Township of Port Huron and the County of St. Clair, as host communities to the plaza and corridor projects, have identified a number of items that will be required. The host community requirements are as follows:

1. It is clear that City of Port Huron, County of St. Clair and the local school districts will lose revenue as a result of the Blue Water Bridge Plaza project. There are property tax revenues, income tax revenue, personal property tax revenues, State revenue sharing, utility revenues, water/sewer revenues, etc. All of these revenue losses will have a significant impact on our communities. Since the magnitude of these losses are so severe, the entities that have an interest must be supplied a permanent revenue stream to lessen the impact. We are requesting a payment in lieu of taxes (PILOT) in the form of an increase in the bridge crossing tolls and the revenues of said increase be directed to the City of Port Huron, County of St. Clair, and school districts and any other taxing jurisdiction. This PILOT should completely cover all tax revenue losses as well as any additional costs the municipalities may incur in the form of additional emergency responder duties, such as police, fire, EMS, HAZMAT, etc.
2. A supplemental DEIS is needed to address the shortcomings of the present DEIS and to assure that there is full disclosure/adequate opportunity for public comment at this stage in the process. It is not acceptable for our concerns to be addressed only in the Final Environmental Impact Statement. Once the supplement DEIS is released, there must be opportunity for another 60-day public comment review period.
3. It will be necessary to have a non-motorized crossing over the Black River and tying it into a route connecting the Township Park with Edison Parkway.

4. MDOT will need to include the construction of the Visitor's Center immediately adjacent to the plaza with access from all directions. There must be significant signage to ensure that motorist will have a clear view of this facility from all directions.
5. MDOT representatives have made a general statement that the agency will work with local communities and citizens in order to identify possible state and federal resources. However, there were no concrete assurances outlined in the DEIS. We would like to ensure that the Community Assistance Team (CAT) will meet with each of the affected communities to provide various tools and incentives that will enhance long-term economic development plans. Further, strict application of and adherence to existing program guidelines must be relieved. CAT team members must be provided with the flexibility to work with the community in developing creative solutions to the unique situation we find ourselves in.

The communities require CAT support in obtaining various grants for project, such as:

- a. the sewer separation project in the City of Port Huron;
- b. retraining of workforce through RESA and/or school districts;
- c. rehabilitation of the McMorrان Plaza;
- d. emergency and first responder equipment and training for all local jurisdictions; and
- e. revitalization of the M-25 corridor both north and south of the plaza.

The preferred alternative that MDOT is proposing will have an enormous impact on the community and the future of our community. Therefore, MDOT's commitment to the economic security of our community must be proportionate.

6. Off-site improvements to section of M-25 from Pine Grove to Fort Gratiot Business District (Birchwood Mall) must be made in order to maintain efficient traffic flow in the surrounding areas, as follows:
  - a. synchronization of lights from Business Route I-94 at Oak to Metcalf Road;
  - b. Base line study of travel time from Oak to Metcalf Road, as well as regular (every year) evaluation of the same with resulting changes to light synchronization and access management strategies;
  - c. lane expansion, including one lane northbound and one lane southbound, from the plaza north to Krafft Road.
  - d. expansion and safety improvements of the M-25 Black River Bridge, including amendments to the weight limitations if necessary; and

- e. planning and implementation of access management strategies from the plaza north to Metcalf Road.

St. Clair County's commitment to providing full public disclosure of the impact of these projects is unwavering. The DEIS provided by MDOT does not provide satisfactory impacts and we require MDOT to review and answer the questions outlined in Exhibit A. Once a supplemental DEIS is released, we will require at least another 60-day review period to provide additional public comments.

If you would like to meet with us on any of the issues, please do not hesitate to contact us.

Sincerely,



Shaun S. Groden  
Administrator/Controller



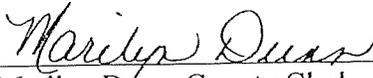
Wallace Evans, Chairperson  
Board of Commissioners

Enclosures

Cc: The Honorable Candice Miller  
The Honorable Debbie Stabenow  
The Honorable Carol Levin  
The Honorable Jud Gilbert  
The Honorable Daniel Acciavatti  
The Honorable Phillip Pavlov  
The Honorable John Espinoza  
City of Port Huron  
Township of Fort Gratiot  
Township of Port Huron

I, Marilyn Dunn, Clerk of the County of St. Clair, do hereby certify that the attached extract from the minutes of a regular meeting of the St. Clair County Board of Commissioners, Port Huron, Michigan, held on December 5, 2007, is a true and correct copy of the original Minutes of said meeting on file and of record insofar as said original Minutes related to the matters set forth in said attached extract, and I do further certify that the copy of the resolution appearing in said attached extract is a true and correct copy of such resolution adopted at said Meeting on file and of record.

IN TESTIMONY WHEREOF, I have hereunto set my hand and seal of the County of St. Clair, Michigan, this 6<sup>th</sup> day of December, 2007.

  
Marilyn Dunn, County Clerk  
County of St. Clair, Michigan

RESOLUTION 07-44

ST. CLAIR COUNTY RESPONSE TO THE DRAFT ENVIRONMENTAL IMPACT STATEMENT  
FOR THE BLUE WATER BRIDGE PLAZA STUDY

WHEREAS, the Blue Water Bridge crossing between the U.S. and Canada is a critical economic link for both countries and security improvements at the plaza are a necessary and viable objective; and

WHEREAS, the Michigan Department of Transportation (MDOT) and the Federal Highway Administration (FHWA) have published a Draft Environmental Impact Statement (DEIS) for the Blue Water Bridge Plaza Study which is dated August 10, 2007, with public comment being accepted from August 10 through December 10, 2007; and

WHEREAS, the DEIS must comply with relevant sections of the National Environmental Policy Act (NEPA) and its implementing regulations, as well as several other state and federal environmental laws; and

WHEREAS, all three of the practical alternatives studied in detail in the DEIS (including the preferred alternative) would inflict massive negative impacts on the County of St. Clair, including the City of Port Huron and the surrounding townships; and

WHEREAS, St. Clair County staff and affiliates have reviewed the DEIS and provided the St. Clair County Board of Commissioners with an extensive report on their assessment.

NOW, THEREFORE, BE IT RESOLVED that the St. Clair County Board of Commissioners hereby declares:

1. The DEIS fails to provide full public disclosure of impacts, does not adequately justify the project's costs/negative impacts, does not evaluate a reasonable range of alternatives, and does not provide adequate mitigation for the massive negative impacts which are anticipated. Details regarding these shortcomings are provided in our official comment letter which is attached to this resolution.
2. Improvements to the I-69/I-94 corridor (including repairs to the Black River Bridge) should be evaluated in separate environmental document as previously planned by MDOT. It is not acceptable to delay improvements to this corridor while issues related to the bridge plaza are studied and debated.
3. The proposed 65-acre size of the plaza facility is not justified based on the information presented in the DEIS. Another alternative with reduced size needs to be evaluated in detail and compared to the three practical alternatives presented in the DEIS.
4. A supplemental DEIS is needed to address the shortcomings of the present DEIS and to assure that there is full disclosure/adequate opportunity for public comment at this stage in the process. It is not acceptable for our concerns to be addressed only in the Final Environmental Impact Statement.

BE IT FURTHER RESOLVED that copies of this resolution be sent to Governor Jennifer Granholm, Congresswoman Candice Miller, U.S. Senator Debbie Stabenow, U.S. Senator Carl Levin, Senator Jud Gilbert, Representative Daniel Acciavatti, Representative Phillip Pavlov, and Representative John Espinoza.

Adopted: December 5, 2007

Reviewed and Approved As To Form By:

\_\_\_\_\_  
Gary A. Fletcher  
County Corporation Counsel  
522 Michigan  
Port Huron, Michigan

\_\_\_\_\_  
*[Handwritten Signature]*  
\_\_\_\_\_  
*[Handwritten Signature]*