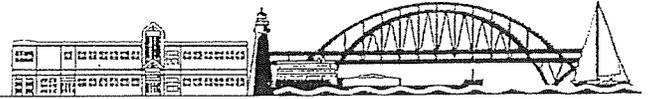




COUNTY OF ST. CLAIR



**Blue Water Bridge
Draft Environmental Impact Statement – Review**

Exhibit A

Compiled Comments

By Staff of

**Metropolitan Planning Commission
Health Department
Road Commission
Sheriff's Office
Emergency Management
Parks and Recreation
Equalization
& Drain Commissioner**

Dated: December 5, 2007

**Blue Water Bridge
Draft Environmental Impact Statement – Review**

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by

**Staff of the Metropolitan Planning Commission, Health Department, Road
Commission, Sheriff's Office, Emergency Management, Parks and Recreation,
Equalization and Drain Commissioner**

EXECUTIVE SUMMARY

Page 2

- The document should address the current and projected design capacity at some point as it was mentioned here.
 - When and how will MDOT discuss the current design capacity?

Page 13

- Referenced are projections for economic loss due to congestion (\$3.9 billion by 2030, tax base loss (~1.5%), and job relocations. These figures have not, and should be, discussed and justified in greater detail in the document.
 - How and when will MDOT address these projections, and at what point will local agencies and the public be able to review and comment on the findings?

Page 18

- As a goal, storm water discharge should be reduced from current levels, not maintained as suggested in the DEIS.
 - How will MDOT coordinate the management of, to a greater degree than is presently applied, storm water for the project area?

CHAPTER 1 – WHY ARE IMPROVEMENTS NEEDED?

Page 7 – What is the History of the Blue Water Bridge and Plaza Improvements?

- It is our understanding that traffic projections (all traffic) have not met the projections to date; it appears that the Plaza currently handles only 1/3 of the traffic it is designed to handle.
 - Though the primary mission of the plaza seems to be security and not facilitation of legitimate commerce, what will be done to guarantee that, despite the size of the preferred alternative, traffic flow will improve and that the plaza will indeed be able to handle the projected traffic volume? (i.e., What systems improvements are being considered or will be included in the project to accommodate growth and security goals?)

Page 14 – Traffic Growth to the Year 2030

- The second of two traffic projections is viewed as more realistic by staff. The first is assuming economic conditions return to pre-9/11 levels. This is also assuming that the current downward trend in truck traffic is affected by only security issues, and not a shift in cross-border commerce trends. For this reason assuming traffic patterns and projections will grow or decline, and basing capacity needs on these trends is naive. It would be more defensible to opt for an expanded plaza based on security needs rather than traffic projections – security is a factor that cannot be denied or refuted.

Page 20 – Crash Potential

- MDOT should develop projections for increased/decreased crash occurrence once flow is improved on the Blue Water Bridge due to removal of the weave and decreased congestion.
 - What measures will be taken to decrease the severity and occurrence of crashes along the corridor and on the Plaza?

Page 21- Crash Potential

- MDOT should develop projections for increased/decreased crash occurrence once flow is improved along the corridor due to the addition of travel lanes and paved/widened shoulders.
 - What measures will be taken to decrease the severity and occurrence of crashes along the corridor and on the Plaza?
 - What measures will be taken to decrease the severity and occurrence of crashes along M-25 and other intersecting roads along the corridor, which are expected to experience increased traffic counts as a result of this project?

Page 22 – Improving Local Roads and Access to Port Huron

- It is vital to the continued social and economic health of the community that improvements to the condition, access, and placement of local roads be made in conjunction with the Plaza project. The full benefit of an improved Plaza will not be realized if the local network is not optimized.
 - How will MDOT see to it that suitable allowances (either funding or actual improvements) are made to local jurisdictions and transportation providers to ensure that the transportation network (roads and transit) operates at an optimal level?

Page 23 – New Welcome Center

- Safety and security and the proposed Welcome Center should be coordinated in close cooperation with local law enforcement agencies. Due to its proximity with the urbanized areas of St. Clair County, it is possible that “unwelcome” activities could extend to the new Center.
 - What plans are in place and what accommodations will be made to foster interagency safety and security cooperation?

CHAPTER 2: ALTERNATIVES CONSIDERED

Section 2.1 Alternatives Development

- It appears that no public input went into the initial 19 illustrative alternatives. The public was not brought on board until those original 19 concepts were refined into six alternatives.
 - What steps did MDOT take to ensure that the general public had access to and input to the design of the initial 19 illustrative alternatives?

Section 2.2 – Alternatives Carried Forward

- Capacity improvements must be made along the identified segments. Rebuilding these sections of roadway (M-25, Water Street, 10th Street, Lapeer) with the understanding that congestion will be nearing unacceptable levels is unacceptable in itself. Knowing that capacity will be an issue even before a road is constructed is a poor decision. MDOT and FHWA would never allow a local jurisdiction to construct a bridge that would be functionally obsolete at ribbon-cutting.
 - What measures and accommodations to local jurisdictions (either funding or actual improvements) will be made to the local transportation network leading to, from, or around the proposed project area?
 - What road improvements and transit accommodations will be made to facilitate the most affective network possible?
- The usual post-and-panel pre-cast sound walls are unacceptable for this application. More aesthetically pleasing designs must be implemented.
 - To what degree are accommodations available for the design and construction of innovative sound walls?

Section 2.2.3 No-Build Alternative

- This section states that the no-build alternative would not work well because required CBP facilities would not be accommodated. It cites traffic counts and 2030 projections, but does not mention anything about current staffing levels of existing CBP facilities or booths or systems investments their impact on current congestion levels if staffing was increased, and technology or systems investments were made.
 - How would the scope and impacts of the no-build alternative be changed if plaza staffing was increased or altered from its current state?
 - How would the scope and impacts of the no-build alternative be changed if standard operating procedures for plaza staff were changed to alleviate congestion?

- How would the scope and impacts of the no-build alternative be changed if technology solutions were implemented?
- How would the scope and impacts of this no-build alternative be change if border crossing operational system changes were implemented (i.e., increased participation in programs such as nexus and fast pass)?
- The no-build alternative looked at 2030 growth projections.
 - How old are the projections that were used?
 - What steps did MDOT take to validate previous projections and compare the 2030 growth projections that it used to projections made by other entities?
 - MDOT should explain how it analyzed the current lag in the economy and the fact that the city has and continues to lose, not gain population?

Section 2.3 Evaluation of Alternatives

- It appears that no members of the general public or potentially affected neighborhoods were part of the Advisory Committee.
 - What steps did MDOT take to ensure that the general public had representation on the Advisory Committee?
 - What steps did MDOT take to ensure that residents in the Study Area had representation on the Advisory Committee?

CHAPTER 3: THE ENVIRONMENT: WHAT'S THERE NOW AND PROJECT EFFECTS

Section 3.1 - Land Use And Zoning

Finding Statements:

- “No Build” alternative is consistent with local plans and zoning.
- “City East” alternative is not consistent with local plans or zoning.
- “City West” alternative is not consistent with local plans or zoning.
- “Township” alternative is not consistent with local plans or zoning.

- Due to reported projections in increased traffic (not substantiated within section), all three alternatives will create a need to review and modify the Master Plans and Zoning for the project area communities.

- If a build alternative is undertaken, the surrounding businesses are suspected to re-locate in the area: if their market remains stable. Relocation activities by businesses will consume areas of current residential lands. However, the impact of the probable relocation of businesses and associated impacts are not addressed in this section but referred to in section 3.7. Additionally, a conflict with noise, lighting and other visual ordinance language is referred outside the section to 3.10 and 3.8, respectfully. All of these issues have land use implications and should be adequately addressed (as it relates to land use) in this section.

- In general, the format of the section hampers an easy review of the material presented due to the marginalia and inconsistent reporting method. As an example: the final analysis (beginning on page 3.1-7) starts in paragraph format for the “No-Build” Alternative while the “Township Alternative” has been completed in a bullet style.
 - How are the alternative plans incorporating stated goals to preserve community character within St. Clair County?
 - Will any plans to enhance a potential tourism experience be measured against written community plans and ordinances regarding noise, light, odor or any other documented source of pollution? As each alternative will impact local plans and ordinances:
 - What would be the expected expense for each community to incorporate such a development into their plans and zoning: both for the immediate building areas and the impacts due to relocation of businesses?
 - What assistance will be provided to help communities amend their short and long term goals to accommodate such a development project?

- Will project partners work with and provide technical assistance to municipalities to evaluate the project's impact on local comprehensive plans and revise those plans?
- What would be the timeframe and efforts by MDOT to facilitate communities in the process of restructuring their plans to support this plaza development?
- What specific development types (recreational commercial, tourism, vehicle maintenance, food services) would each community need to consider into the future. As stated within the DEIS, the current plans are not sufficient to address expected traffic increases into the future?
- If the expected traffic has not been sufficiently addressed within the current community plans, what areas within the adjacent transportation network may need improvements to handle the future demands both with and without the bridge plaza?

Additional Comments/Questions:

- Are the proposed uses consistent with appropriate Land Use Plans? (Including the communities of Port Huron, Kimball, County)
- Are the proposed uses consistent with current Zoning? (Including the communities of Port Huron, Kimball)
- Is the State required to comply with local planning and zoning? If so, when will the review and approval process begin?
- Are their public lands (owned by City/Township/County) within the footprint of either project? How will the impacts be mitigated?

Section 3.2 - Community and Neighborhood Impacts

3.2.7 How Do People Get Around the Port Huron Area?

- The City West Alternative anticipates a traffic roundabout on the re-routed Pine Grove Avenue, between Scott Avenue, and Mansfield Street.
 - Have pedestrian and bicyclist needs been anticipated for this area?
 - What are the design and operational issues that are being considered for visually impaired pedestrians at this roundabout?

3.2.9 How Will the Alternatives Affect Neighborhoods?

- The Township Alternative will create a vast North-South barrier (perceived or real) along the proposed secure corridor.
 - How does each alternative, and in particular the preferred alternative, minimize the barrier (perceived or real)?
 - What steps will be taken to minimize the barrier during construction of the preferred alternative?
 - Please explain how the community can be assured that there will be no net loss of north/south capacity in the study area during and post construction.

Additional Comments/Questions:

- How many households will be displaced? What communities and neighborhoods are those households expected to relocate to? What impacts might those communities experience as a result of these relocations?
- What are the economic characteristics of those households (not just what the 2000 Census Block data reveals, what does a door to door survey show)?
- Are there existing Low/Mod income subsidized housing units within the footprints? How many units and how many families? How will those housing needs be met if displaced?
- Are there any social, cultural, religious, education based meeting centers such as churches, community centers, etc., within the footprint? If so, how many and how will the displacement of families and these centers impact the services delivered by the centers?
- How many businesses are located within the project footprint? If so, how many and how will the services they provided to the community (at the neighborhood level, city wide, greater community wide) be accommodated in the future?
- Are there historically or culturally significant structures or sites within the project footprint? How are they to be treated and their value to the neighborhood and community be preserved?
- Are there streets and pedestrian systems within the footprint and surrounding area that may be considered or rendered isolated by the user during the construction and after completion of the project?
- Have you identified neighborhood structures and geographic areas that will now have a new 'neighbor' changing their view, value, solitude (sound), air quality characteristics of that structure or area? If so, to what extent will each of those attributes be impacted? Are steps going to be taken to mitigate those impacts and changes? Describe these mitigation activities.
- What type of isolation facility will you have for person(s) suspected of being infected with hazardous communicable disease (i.e. SARS, Avian Flu)? Hazardous communicable disease is a threat to public health for the citizens of St. Clair County and the United States. This has been recognized by the Center for Disease Control, the Office of Homeland Security and local health officials. To limit the risk of infection of the public due to international spread of disease, it is imperative that within the Blue Water Bridge Plaza compound a clinical isolation/quarantine facility is constructed for holding and medical triage of persons entering this country and the U.S. who are suspected of exposure or known to be infected with a hazardous, contagious disease. Holding individuals for interview and triage at the border plaza will provide opportunity for appropriate prevention and treatment measures.
- What type of quarantine/ isolation facility will be available to prevent spread of disease? Current protocols permit temporary quarantine up to 72 hours. How will detainees be accommodated?
- Will there be a first aid station that can double as a quarantine facility with proper ventilation?

- Discuss the expected traffic (2007, 2010, 2020) at the following locations and what steps will be taken in designing the Plaza and Corridor project to ensure existing levels of service will not be reduced at those same locations:
 - M-25 bridge over the Black River Canal
 - Wadhams Bridge over the Black River
 - Wadhams Road from I-69 to Black River Bridge
 - North Street from Wadhams Bridge to Keewahdin
 - Keewahdin from North Street to M-25
 - Lapeer from Wadhams road to I-69

- Are the Black River Bridge improvements, from the bridge into the City, being designed to handle increased traffic capacity traveling both north and south of the plaza?
- Is the plaza being designed to ensure ease of direct access to and from M-25?
- An easy route back into the downtown and Fort Gratiot area from the Welcome Center must be designed into the project. (The Welcome Center will highlight great things to do in the Port Huron area. The project design must not act as an impediment to accessing those community assets.) How will the proposed welcome center location and road connections enhance visitors' experiences through improved access to those areas and attractions most frequented?

Section 3.3 Environmental Justice

- Section 3.3, Environmental Justice, basically implies that minority and low-income residents will not bear any more hardship caused by the bridge plaza construction than any other population group. The 'pain' will be spread evenly among all residents of the study area.
- Document minority and low-income population within the study area by block group.
- How do these figures compare to the community as a whole?

Section 3.3.4 - What are the Effects of Each Alternative on Environmental Justice Populations?

- On page 3.3-7, the DEIS notes that "All residents of the Study Area including minorities and lower income groups will benefit from positive impacts of a potential new Blue Water Bridge Plaza. Potential beneficial impacts include relief of local traffic congestion, increased border safety and security, job creation, and improved economic conditions for businesses that depend on trade."
 - Explain what sort of job creation for environmental justice population will take place in the study area and in the City of Port Huron, as a result of this project?
 - What actions will be undertaken by MDOT to work with other state agencies, local non-profit organizations, and other entities to bring jobs to

- the City of Port Huron, particularly the immediate Study Area? When will this work begin? Will there be measurable outcomes established for this effort? Explain how agencies will be held accountable for attaining these measures?
- What are the factors that suggest there is a potential for job creation as a result of each of the four alternatives being considered?
- On pages 3.3-9 and 3.3-11, it states that neighborhood cohesion would be divided and that several businesses would be relocated, which “could present a challenge to the local low-income population to find sufficient alternatives to these departed businesses” and that “low-income residents may be limited in personal transportation options and rely on public transit to reach similar businesses in other parts of the Port Huron area.”
 - What actions will MDOT undertake to work with Blue Water Transit to ensure that low-income residents are able to reach similar businesses in other parts of the region as a result of business relocation?
 - Explain how MDOT will identify alternative businesses and services within a reasonable distance of affected residents.
 - This section later states that environmental justice populations will experience the same changes in access, emergency service routes, and minor transit re-routing as everyone else. However, non-environmental justice populations would not be affected in the same way. There seems to be conflicting statements as to the overall impact on low-income residents in terms of changes to public transportation routes and access to businesses that will have to relocate as a result of the project.
 - Elaborate on the mitigation strategy that will be pursued to ensure that minority and low-income populations will suffer no net loss in access to businesses and services.
 - How will each alternative under consideration impact minority and low-income residents in the Study Area that rely on walking to school, work, businesses, or for recreation?
 - How will each alternative under consideration impact the provision of and access to social services in the surrounding neighborhoods, the city of Port Huron, and neighboring townships?
 - The document identifies that the City East option will benefit Environmental Justice populations and border crossers with relief in traffic congestion.
 - Provide actual numbers and projections that prove there will be a relief in traffic congestion for environmental justice populations.
 - The document identifies that the Township Alternative would result in less minority relocations, because that alternative has fewer relocations in total.

- How will each alternative impact the demographic character of the surrounding neighborhoods? How will the project affect interaction among persons and groups? How will it change social relationships and patterns?

Additional Comments/Questions:

- What are the socio-economic, race, cultural heritage characteristics of the households, businesses and their service population located within the project footprint, within one quarter, one half, and one mile of the expected boundary of the project footprint?
- Identify the 'Environmental Justice' population for the project footprint, within one quarter, one half, and one mile of the boundary of the project footprint?
- Do these numbers indicate that this project will or may affect these populations to an extent greater than the 'non-Environmental Justice' population?
- If there is a predominant affect on the 'Environmental Justice' population, what steps will be taken to mitigate this finding?

Section 3.4 – Economics

- Does the displacement of any businesses within any of the proposed alternatives affect any existing TIF zones or other tax capture areas?
- If so, to what extent and how will the impact be mitigated?

Section 3.4.1 What are the Existing Local Economic Conditions?

- The section covering “Existing Businesses and Economic Activity” is very general and simply lists, in general terms, some of the types of businesses and government buildings that are located in the vicinity.
 - There is actually very little discussion of “local economic conditions” in this section.
 - What impact have recent plant closures or layoffs had on the local economy? In what ways would each alternative under consideration potentially benefit the local economy?
 - What are the current shopping and business patterns within the project footprint? One quarter, one half, and one mile of the boundary of the project footprint? What are the current shopping and business patterns of the population that frequents those commercial and retail centers from a multi-jurisdictional perspective?
 - What existing retail and commercial centers are expected to benefit during construction? What does this impact translate to in terms of jobs and spending?
 - How will each alternative being considered add to resident and visitor experiences to the greater Port Huron area? What measures will be taken to ensure that the experience is enhanced for the life of the improvement?

- Unemployment data is based on 2005 numbers which are now out of date. Update this data to at least the quarter prior to release of the DEIS and provide appropriate analysis.
 - What steps will MDOT take to ensure that there will be no jobs lost as a result of each alternative under consideration?
 - In what ways do the most recent unemployment figures for the City of Port Huron and St. Clair County change the scope and impacts of each alternative under consideration?
- Employment projections and overall economic discussion does not seem to account for the struggling economic times that the city currently faces. DEIS generally mentions the plight of the auto industry.
 - How will the struggling economy and current economic trends change the scope and impacts of each alternative under consideration?
 - What are the effects of current economic trends on local as well as regional Blue Water Bridge Plaza congestion?
- The number of Canadians that cross the bridge to come to work in St. Clair County is based on discussions with “several major employers.” As a result, the number given seems arbitrary and no level of accuracy can be ascertained.
 - What steps did MDOT take to garner accurate figures on the number of Canadians that cross the bridge to work in St. Clair County?
 - Explain the methodology and steps taken by MDOT to identify how many Canadians cross the bridge to go to work in other parts of Southeast Michigan.
 - How many residents of St. Clair County and Southeast Michigan cross the bridge on a daily basis to work in Canada?
 - In what ways would each alternative under consideration encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?
 - Describe the impact that the development will have (during construction and upon completion) on the reach of the retail marketplace along M-25 from Main Street Port Huron to the north end retail center in Fort Gratiot Township.
 - How were these impacts determined?
 - How will these impacts be affected by each alternative under consideration?

Section 3.4.3 Assumptions and Methodologies

- In the analysis of the impacts to the tax base, the DEIS states “Future changes in taxable value due to the impacts of a particular alternative on neighboring parcels are not accounted for in the assessment.”

- Not including the estimated changes in taxable value is a major omission and is one of the major purposes of performing the EIS in the first place; certainly similar studies have been performed on major transportation projects which could act as a model for this project.
- What methodology was utilized to analyze the impacts of each alternative under consideration on the local tax base?
- Provide the methodology and resulting estimates of taxable value that will be affected by the preferred alternative.
- In the “Job Impact Analysis” section, it states that the study team developed estimates of the jobs that would be relocated, including estimates for relocated jobs where data was unavailable. However, the DEIS does not state what those estimates actually are until later in the report.
 - Elaborate on what steps MDOT will take ensuring that jobs in other areas of the city of Port Huron and St. Clair County will not be adversely affected as a result of the loss or relocation of jobs in the Study Area.
 - Will there be a multiplier effect for job loss in the city and the county?
 - If so, what will that multiplier effect be and how was it determined?
- In the “Cost of Congestion Analysis” section on page 3.4-12, the DEIS simply refers to a 2003 study by Taylor, Robideaux, and Jackson. This section mentions this report, but gives no actual data or findings until much later in Section 3.4.
 - What steps did MDOT take to ensure that the findings of this 2003 study are still relevant today?

Section 3.4.4 How Would a No-Build Alternative Affect Businesses, Taxes, Jobs, and Trade?

- Quite often in the DEIS it refers to negative impacts on trade between the US and Canada due to increasing levels of congestion causing longer delays on the Blue Water Bridge if the no-build option is chosen. However, the DEIS does not do an adequate job of substantiating the claim that congestion will increase.
 - What are the factors that will lead to an increase in congestion?
 - What other alternatives did MDOT examine to effectively manage existing congestion and mitigate projected congestion? Did those alternatives include organizational system or technology solutions? If so, what was considered and what were the conclusions that led to consideration of envisioning the proposed alternatives.
 - What methodology was utilized to deduce that those alternatives were insufficient?

- On page 3.4-13, it states that “other studies have suggested that there will be high job losses unless the Michigan border crossings, including the Blue Water Bridge, are improved.” However, no concrete figures are stated to back this statement up. Instead, the report cites one conclusion from one report.
 - Elaborate and provide a concrete connection between the no-build option being selected and inevitably causing job loss.

Section 3.4.7 How Would the Township Alternative Affect Businesses, Taxes, Trade, and Jobs?

- This section does not include comprehensive analysis of how the City East or City West Alternatives would affect the nearby commercial zones in Fort Gratiot Township or the City of Marysville (during construction or after).
 - Specifically, what are the anticipated impacts to businesses, jobs, and the overall economy in Fort Gratiot Township, Port Huron Township, the City of Marysville and other surrounding communities?
- With the exception of Section 3.4.7, most of Section 3.4 (Economics) deals with impacts to either the Study Area or the City of Port Huron, particularly downtown Port Huron. There is very little analysis of the impacts to businesses, jobs, and the overall economy in Fort Gratiot, Port Huron Township, or other surrounding communities.
 - In what ways will each of the alternatives under consideration impact the economy in Fort Gratiot, Port Huron Township, and other surrounding communities?
 - In what ways will each of the alternatives under consideration potentially benefit the economy in Fort Gratiot, Port Huron Township, and other surrounding communities?
 - What specific employment and industry sectors will be impacted the greatest in these surrounding communities?
 - What sort of multiplier effect will there be on businesses and employees in these surrounding communities as a result of business and employee relocation in the Study Area?

Additional Comments/Questions:

- What is current shopping and business patterns within the project footprint, one quarter, one half, and one mile of the boundary of the project footprint?
- What are the current shopping and business patterns of the population that frequents those commercial and retail centers from a multi-jurisdictional perspective?
- What is the extent of the current geographic area that the potentially impacted shopping and business areas draws from (the market area)?

- How will the construction impacts draw commerce from that market area? What does this impact translate to in terms of jobs and spending?
- After construction, how will the extent of the existing market area be altered? What does this impact translate to in terms of jobs and spending?
- What existing retail and commercial centers are expected to benefit during construction? What does this impact translate to in terms of jobs and spending?
- What new retail and commercial centers are expected to be established after construction? What does this impact translate to in terms of jobs and spending?
- How will local and County Government's share of sales tax revenues be impacted by changes in spending patterns?
- What is the total current revenue from real estate, personal property, and income tax for the project footprint, within one quarter, one half, one mile of the project footprint broken out by taxing jurisdiction?
- How are changes in land use patterns, housing opportunities, consumer spending, expected to impact these current tax revenues (in current dollars projected for periods of one, five, ten, twenty, and thirty years) for the geographic areas described above?
- Are there opportunities for transportation, logistics, warehousing jobs resulting from these public investments? If so, where and when might these opportunities materialize? What incentives is the State and Federal government ready to offer to encourage these jobs and capital investments (both financial and programmatic)? What other types of employment can be expected to materialize from the opportunities that an improved border crossing have been shown to offer?
- There will be a tax-base loss for the County, City and Township. Will the State provide a payment in lieu of taxes for the permanent loss of potential tax base?
- Describe the economic growth that is expected to occur along the Plaza and I-94/69 Corridor in St. Clair County as a result of this public investment and increased border traffic.
- An easy route back into the downtown and Fort Gratiot area from the Welcome Center must be designed into the project. (The Welcome Center will highlight great things to do in the Port Huron area. The project design must not act as an impediment to accessing those community assets.)
- Are there assurances that local contractors or workers will benefit from construction jobs?
- Will the project comply with Davis Bacon and prevailing wage (depressed area) standards?
- Consider constructing the Welcome Center in median between east and west bound I-94. This will aid in ease of returning to the Port Huron and Fort Gratiot areas.
- What is the actual tax revenue that would be lost to the county, cities and townships?

Section 3.5 – Safety and Security

Additional Comments/Questions:

- What are the existing routes used by public safety agencies within and through the project footprint?
- How will these routes be accommodated during the construction period?
- Once completed, what are the expected routes for these agencies both within and through the project footprint?
- How will these changes impact response times, both during construction, and upon completion of the project?
- Will any new specialized response equipment be necessary given the expected facility, equipment, and changes in intensity of use at the plaza and within the corridor?
- Will any assistance be provided for the acquisition, training, and maintenance of this equipment?
- Are current communication and intelligence sharing functions between those agencies with authority on the Plaza and the host communities considered adequate? If not, how will they be improved ensuring protection of international, state, and local assets and populations?
- Will there be a local 24/7, manned, phone number for law enforcement to call during construction, if there are issues?
- If it is vital for security that the plaza be on ground level, how will 10th Avenue be affected as it currently goes beneath both bridges? Will 10th Avenue be closed?
- Describe plans for multiple points of accessibility for emergency response 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.
- Describe facility systems that will accommodate neighborhood alert to release of airborne hazardous materials (i.e., an audible siren system).
- Will fire suppression systems be installed over inspection areas to help contain incidents?
- Describe on-site equipment and material that will be immediately available to respond to hazardous material releases.
- Many people live north of the plaza yet work south of it. What will be done to ensure that those working south will be able to easily access the north end in the event of an emergency at the plaza?

Section 3.6 Relocations

Section 3.6.1 What is the Current Real Estate Market in St. Clair County?

- DEIS indicates that businesses are growing in the Port Huron area, that long-term trends for commercial development in the Port Huron region are positive, and that the presence of the Blue Water Bridge assists businesses in the City of Port Huron. However, no actual numbers are given to support these claims. Instead, they are based on general discussions with realtors.

- Can these claims be substantiated?
- Provide evidence and factual information that supports the notion that businesses and commercial development in the Port Huron region are positive (i.e. expanding).
- In what ways does the presence of the Blue Water Bridge assist businesses in the City of Port Huron and the greater Port Huron area?
- Describe in detail the methodology and source information that points to long-term growth for commercial development in the city of Port Huron and St. Clair County.
- Provide a list of specific businesses that have relocated from the Detroit Metropolitan Region to Port Huron in the past 3 years.
- Provide data and recent trends in home sales for Port Huron from 2002-2007. What have the sales trends been and how have sales prices changed in the past five years?
- How many foreclosures are there in the City of Port Huron? How many foreclosures are there in the Study Area?
- How many households and businesses have already been relocated? Where have these businesses and households relocated to? What type of assistance was provided?
- How many households and businesses are expected to be relocated due to direct expected economic impacts? Due to indirect economic impacts (i.e., changes in shopping habits)?
- How will business relocations affect existing market areas, shopping patterns, and spending patterns? How has the relocation impacted the business and community they moved to?

Additional Comments/Questions:

- How many households and businesses have already been relocated? Where have these businesses and households relocated to? What type of assistance was provided? What steps will be taken to follow-up with those relocated to ensure unanticipated consequences of the move are addressed?
- How many households and businesses are expected to be relocated due to the direct effect of the project (within the proposed footprint)? When are these households and businesses expected to be closed and moved?
- How many households and businesses are expected to be relocated due to direct expected economic impacts? Due to indirect economic impacts (i.e., changes in shopping habits)?
- What communities or neighborhoods within communities are these households and businesses expected to relocate to?
- How will these business relocations affect existing market areas, shopping patterns, and spending patterns?
- How will these household relocations effect existing housing values (both assessed and sales values) in the community or neighborhoods that they are relocating to?

- Are there any expected impacts in those communities that households relocated to such as displacement of existing homeowners, renters, property owners, or through gentrification?
- What type of assistance (financial as well as programmatic) can communities expect to receive to mitigate the impacts of relocation of households and businesses?
- What steps will be taken to create a single point of contact for those households and businesses that are relocated? How long after completion of this project will that office remain open?

Section 3.7 – Indirect And Cumulative Impacts

3.7.3 Description of Development in St. Clair County and the Port Huron Area

- This section fails to identify that Downtown Port Huron is essentially an island and that any changes in traffic flow can have substantial affects on how traffic ingresses and egresses from this ‘island’. Furthermore, traffic signal timing has been undertaken in the past to minimize north-south congestion issues between Port Huron and Fort Gratiot along M-25. There is no mention of mitigation to local units to retime or synchronize signals during or after construction of the City East or City West Alternatives.
 1. MDOT says traffic will increase in the coming years.
 2. The current transportation configuration can’t handle traffic effectively.
 3. How is it expected to once this “super-efficient” plaza is constructed?
 4. There are very few roads onto and off of the “island” that is Port Huron. What measures is MDOT going to take to mitigate the current/projected congestion along all corridors leading to and from Port Huron?
 5. MDOT can’t affectively handle the traffic now – how will it once the plaza is built?

3.7.4 What are the Indirect Impacts?

- There is no mention of how local and County Government’s share of sales tax revenues may be impacted by changes in spending patterns as a result of consumers shopping outside of the county to avoid construction congestion. Furthermore any such change in shopping patterns could become permanent as a result of habit even after construction completion.
 - Provide an estimate of the sales tax revenues by community (Port Huron, Fort Gratiot) during construction and after completion of the project.
 - What action will be taken to mitigate expected loses?

3.7.7 How did the Study Team Determine if the Alternatives would have Cumulative Effects?

- There is no mention of the St. Clair County Drain Commissioner’s Procedures and Design Criteria for Storm Water Drainage and Development Plans in the list of documents reviewed.

- How would cumulative effects to drains and watercourses be mitigated?

Section 3.8 – Aesthetic and Visual Impacts

Additional Comments/Questions:

- Will existing structures throughout the project (plaza and corridor) reflect the unique character of the host community (define that host community with respect to community character)?
- How will that community character be developed or discovered?
- How will that character be translated into physical elements?
- Will properties currently within sight of the properties to be developed, be protected from this development through design elements? If not, how will the design itself offer that ‘protection’?
- Will an evaluation of development alternatives include a visual preference survey workshop?
- Will an evaluation of development alternatives include proposed viewshed protections that consider unique community, cultural, historical, environmental characteristics present within the project footprint?
- Does a baseline lighting impact study exist? Does such a study consider both spillover to surrounding properties and impedance to view of the night sky?
- How will security lighting be designed and deployed to minimize glare and light spillover into surrounding properties?
- How will lighting throughout the expanded facilities minimize ‘light pollution’ of the night sky?
- How will light pollution be minimized?
- How will noise pollution be minimized?
- What are the facility plans for holding livestock?
- How will animal waste be disposed?
- What odor control measures will be taken for the animal containment facility, and the animal waste?
- Ensure that the retaining and security walls constructed around the plaza and corridor are aesthetically pleasing.
- Construct a public park around the perimeter of the plaza softening the impact of the wall itself and enabling the site to become a community asset.

Section 3.9 – Air Quality

Additional Comments/Questions:

- Have baseline studies been conducted of air quality within the project footprint? Within one quarter or one half mile of the project footprint? When will a “hot spot” air quality study be completed and will it include a base line measure as

- well as measures expected during construction, upon completion, 5 years, 10 years, 20 years into the future? What are the results of these studies?
- How will the proposed projects impact the findings of the baseline study?
 - What are projected air quality findings five years after completion of the project? Ten years? Twenty years? Thirty years?
 - What steps will be taken to mitigate any decreases in air quality (increases in measurable amounts of target gases and particulates)?
 - What steps will be taken to protect surrounding land uses from adverse impacts of decreased air quality and increased particulate materials? What systems will be deployed to alert the surrounding community of air quality emergencies?
 - Are expected air quality levels in line with standards established for the community and region by SEMCOG, Michigan DEQ, and US EPA? (Upon completion of construction, five years, ten, twenty, and thirty years after completion.)
 - Since there is parking for 200 semi-trucks, what policy will be utilized to control carbon monoxide emissions?
 - St. Clair County is currently on the non-attainment list for the 8-hour Ozone levels. What measures will be taken to assure that the project will not add to the problem?

Section 3.10 – Noise Impacts

Additional Comments/Questions:

- Have baseline measures been established at the Plaza and throughout the corridor?
- Do these measures fall within acceptable ranges for adjoining neighborhoods as established by City and Township ordinances? Do they meet State (MDOT, MDEQ, MIOSHA) standards?
- What land uses surrounding the project area will be most affected by noise issues?
- How will MDOT work with those entities to ensure that they are involved in Context Sensitive Solution development?
- What are the projected noise levels at the edge of the proposed footprint and within a quarter mile of the footprint for five, ten, twenty, and thirty years into the future based on anticipated traffic growth and known technology.
- Will these levels meet existing City and Township standards?
- How will construction activities be managed to minimize noise in surrounding neighborhoods?
- What steps will be taken to minimize the impacts of noise on surrounding land uses, residents, and businesses?
- How will noise levels be monitored at the plaza boundaries during normal operations? What steps will be taken to reduce noise levels during normal operations when they are found to exceed acceptable standards?

Section 3.11 – Groundwater, Drainage, and Surface Water Quality

Additional Comments/Questions:

- What groundwater aquifers exist within the study area? What direction do these waters flow in? How many water wells in the 'down-stream' direction exist?
- What construction activities are expected to occur which could threaten the quality or quantity of groundwater within the study area and down-stream? (i.e., driving pilings, footings, test boring, etc.)
- Do groundwater recharge areas exist within the study area? Within the drainage basin that includes the study area?
- What effect will construction and changes in land use have on those recharge areas, both the quantity and quality of the water in the drainage basin?
- What groundwater wells exist in the project study area? What measures will be taken to ensure the integrity of that source of water during construction and upon completion of the project?
- What monitoring systems will be put in place during the construction phase to ensure the quality of groundwater used for drinking water is not compromised?
- What County and natural drains exist within the drainage basin of the study area?
- What impact will changes in land use and construction have on the quantity and quality of storm water that ends up in those County and natural drains?
- Are the proposed developments consistent with and will they be designed in a manner as to support existing storm water plans, watershed plans, land use, and infrastructure plans that exist? What such plans have the project partners reviewed?
- Are the proposed construction practices and development plans consistent with the County's Storm Water Permit and Storm Water Pollution Prevention Initiative (SWPPI)? The City's SWPPI?
- What steps will be taken to ensure compliance with the SWPPI and County Storm Water Permit?
- Have the project partners begun discussions with the Drain Commission? With the County Storm Water Coordinator?
- What Best Management Practices will be implemented during construction to ensure storm water discharges from the site are not contaminated with trash, hydrocarbons, sediment, and heavy metals?
- What Best Management Practices will be implemented to prevent degradation of storm water quality and increased storm water discharge to local surface waters after construction and during normal site operations?
- What monitoring of storm water outfalls will be implemented prior to, during and after construction to ensure storm water quality is not degraded and the quantity of storm water is not increased to local surface waters?
- What measures will be taken if monitoring determines storm water discharges from the project site are degraded in quality or increased in quantity?
- St. Clair County, the City of Port Huron, Port Huron Township and Kimball Township have all participated in the development of the Northeastern Watersheds Management Plan and must meet the goals and objectives of this plan for purposes of compliance with NPDES Phase II Storm Water regulations. How

will this project meet the following related goals and objectives of the Northeastern Watersheds Management Plan?

- Goal 2: Ensure sustainable growth and development.
- Goal 3: Protect and improve water related recreation.
 - Objective 3.1 Reduce sediment loading and associated turbidity
 - Objective 3.7 Minimize chemical spills and ensure proper notification of spills.
- Goal 4: Protect and improve the warm water and cool water fishery and conditions for other indigenous aquatic life and wildlife.
 - Objective 4.1 Reduce sediment loading and associated turbidity.
 - Objective 4.3 Stabilize hydrologic flows.
 - Objective 4.4 Enhance and protect riparian areas and in-stream habitat.
 - Objective 4.8 Minimize chemical spills and ensure proper notification of spills.
- Goal 5: Protect public health and the drinking water supply (public and private).
 - Objective 5.5 Minimize chemical spills and ensure proper notification of spills.
- Goal 7: Increase recreational opportunities (parks and other facilities), including public access to Lake Huron, the Black River, and the St. Clair River.
 - Objective 7.1 Work with regional, county, and local governments, and other agencies and organizations to increase water-related recreational opportunities throughout the watershed while protecting water resources from degradation.
 - Objective 7.2 Seek out and act on opportunities for additional parks and recreational spaces, with priority along stream and riparian corridors, and greenway corridors.
 - Objective 7.3 Provide additional public access to water resources.
- Goal 8: Maintain and/or increase the aesthetics of the water resources
 - Objective 8.1 Reduce sediment loading and associated turbidity.
 - Objective 8.3 Stabilize hydrologic flows.
 - Objective 8.4 Enhance and protect riparian areas and in-stream habitat.
 - Objective 8.5 Minimize chemical spills and ensure proper notification of spills.

- Will the project implement any Post Construction Best Management Practices, such as Low Impact Development practices, that will encourage the infiltration and natural filtration of storm water?
- Will the project incorporate Leadership in Energy and Environmental Design (LEED) standards into the construction of the proposed facilities?
- Is there any planning as to how environmental spills will be contained?
- Has any part of the site been classified as an “environmentally sensitive” area? If so, specify.
- Will there be sump pumps operated for potential high ground water levels? What if any adverse effects will that have on adjacent properties?
- Will ‘green’ building and site design standards for on-site storm water treatment be implemented?
- Will all on-site storm water from the corridor project and plaza include cleaning and polishing of all run-off and maintain existing release rates from the sites?
- What plans are in place for the snow removal from the corridor and plaza?

Section 3.12 – Floodplains

Additional Comments/Questions:

- Has an evaluation been made of flood elevations and potential development within the floodway?
- What steps will be taken to ensure compliance with Federal, State, and local flood regulations?
- How will construction activities and resulting development affect the flow of floodwaters within the study area?
- How much additional water run-off will be contributed to the floodway within or adjacent to the study area during construction and upon completion of the projects?

Section 3.13 – Wetlands

Additional Comments/Questions:

- How and by whom will a wetlands inventory be conducted? If appropriate, how will an appeal or conflicting findings with other inventories conducted by a reputable source be received, acted upon, and resolved?
- What wetland types exist within the project study area?
- What wetlands will be directly impacted by construction and subsequent development? How many acres of wetland, what type of wetlands?
- What steps will be taken to minimize impacts on wetlands both direct impacts and indirect?
- If there is mitigation involved, will it take place within the same watershed? If not, what are the reasons for looking elsewhere for mitigation?

- How will project partners work with community leaders that will host mitigation activities? What reviewing authority will the project partners offer to the host community?
- How will wetland development and mitigation activities affect groundwater and surface water quality and quantity within the host watershed(s)?
- Are there plans to minimize the adverse impacts of this development and mitigation activity? What will they consist of?
- If mitigation activity occurs, what efforts will be made to monitor those activities to ensure the success of that activity and future viability of the mitigation activity?
- What type of monitoring will be implemented on wetlands before, during and post construction to determine impacts?

Section 3.14 – Plants, Wildlife, and Threatened and Endangered Species

Additional Comments/Questions:

- What methods were used to identify valuable plants and wildlife, and threatened and endangered species before the project is constructed? Exist within an 'impact area' outside of the immediate boundaries of the study area?
- If appropriate, how will an appeal or conflicting findings with other inventories conducted by a reputable source be received, acted upon, and resolved?
- What threatened or endangered species of plants or wildlife exist within the study area? Within an indirect impact area adjacent to the study area? Will the project impact any valuable plants and wildlife or threaten and endangered species?
- What steps will be taken to permanently protect and preserve those threatened or endangered species that are found to exist within or adjacent to the study area?
- How will efforts to protect and preserve those areas set aside for permanent protection and preservation be monitored?

Section 3.15 – Cultural Resources

Additional Comments/Questions:

- What efforts are being made to reach out to local entities that can assist with identifying historically and culturally significant sites and structures?
- Will contact be made with the local historical society, Port Huron Museum?
- What opportunities will be provided to involve representatives of native peoples who populated the area?
- What steps will be taken to protect and preserve those historic and culturally significant structures within the study area?
- Describe plans to install interpretative signage and memorials honoring historically and culturally significant land uses, structures, activities that may have occurred with the study area which will no longer be readily accessible to the public.

Section 3.16 – Potential Contaminated Sites

Finding Statements:

Each alternative will include sites of Recognized Environmental Conditions (RECs). The report does not include sufficient information to complete a thorough decision without consulting the work papers. Upon reading the written work papers, several items are of concern:

- Both on-site and adjacent area reports included recommendations for further study [Phase II ESA]. The DEIS should-not require “further study,” but be conclusive in its findings.
- Buried oil storage tanks for heating prior to the introduction of natural gas may remain within the project areas. Note: 1937 aerial shows houses removed for the initial span of the Blue Water Bridge. These homes likely used oil tanks.
- Hazardous Materials Routes were not identified and reported as a REC. In addition, the current and future truck parking areas were not listed as temporary storage areas for chemicals of environmental concern. As past history may indicate, spills can occur on or around the bridge facility. The public should be aware of these transient risks just as those with a fixed location.
- Historical Review does not clearly state: “no additional sites were identified” instead the report only states “...identified many of the same sites...”
 - How can this EIS be complete if further research has been indicated in the form of Phase II Site Assessments?
 - In the absence of the recommended Phase II Site Assessments, how would the worst case scenario of each site be addressed?
 - What would be the cost and remediation efforts for each worst case scenario?
 - The reports indicated residential homes were present prior to the introduction of natural gas. How many heating oil storage tanks may remain in the area?
 - If tanks are found, what is the plan of action for this possibility?
 - Were tanks removed for the prior bridge construction projects?
 - If not, what is the plan to remove those tanks?
 - Why did the report not include known transportation routes as potential environmental conditions?
 - What are the impacts of the transportation routes and temporary storage facilities?
 - What are the plans to address the loss of containment of materials in transit or awaiting inspection?

3.16.2 Will the Alternatives Affect any Contaminated Sites?

- Under the Mitigation section it states, “Under any of the Alternatives, a Phase II subsurface assessment will be needed to further investigate the contamination at the REC sites... Depending upon the findings of the Phase II assessment, it may be necessary to perform further investigation or remediation.”

Blue Water Bridge

Draft Environmental Impact Statement – Review Compiled Comments by Staff

- Why does the EIS require further study of REC sites?
- What would be the mitigation recommendations of contamination identified in any Phase II studies?

Additional Comments/Questions:

- What potentially contaminated sites have been identified within the study area?
- To what extent will those contaminants be remediated?
- Will there be an opportunity for respective local governmental oversight of the cleanup activity?
- Describe assurances that will be provided to the local governmental agency with jurisdiction of the site that contaminants discovered or remaining at the site after construction, will not migrate off site. What steps will be taken to monitor the presence and migration of contaminants during construction and once normal operations at the site resume?

Section 3.17 – Farmland

Additional Comments/Questions:

- How much prime and important farmland (as defined by the Natural Resource Conservation Service and/or the USDA-SCS Important Farmlands of St. Clair County Map dated October 1979) will there be permanently rendered unavailable for agricultural activities as a result of this project?
- What steps will be taken to permanently protect an equal amount of prime or important farmland in another area of the county?

Section 3.18 – Wild and Scenic Rivers

Additional Comments/Questions:

- What steps are being taken to permanently ensure public access to the Black River and other rivers or streams within the study area, to the same extent as is currently offered?
- What steps can be taken to increase or enhance access on a permanent basis?
- How will storm water run-off from the roadway be detained and treated to ensure contaminants will not enter the waterways within the study area?
- How will release of hazardous materials be detained and recovered ensuring that it will not enter the waterways of the study area?

Section 3.19 – Coastal Zone

Section 3.19.3 Will the Project Affect the Coastal Zone?

- There is no mention of recommended mitigation activities as a result of lengthening the piers located in the Black River.
 - How would increased rates of sedimentation originating from pier work in or near the river be mitigated?
 - What are the potential impacts to river and near-shore habitat from work being done to lengthen the piers?
 - How would these impacts be mitigated?

Additional Comments/Questions:

- What portions of the project are within the Coastal Zone as defined by the DEQ, NOAA, and or the EPA?
- What impacts are expected to occur within those coastal zones? What steps will be taken to mitigate those impacts?

Section 3.21 – Construction Impacts

Additional Comments/Questions:

- Describe the proposed construction timeline and annual calendars.
- What steps will be taken to ensure that constant access to neighborhoods and business areas on either side of the project at levels currently experienced, will not be compromised by construction activities? Are such disruptions expected and if so describe them.
- What resources will be made available for residents and visitors to quickly and easily access information on current construction activities, delays, and upcoming disruptions to existing systems?
- Describe the signage (placement and content) that is expected to be erected throughout the county to prepare and inform residents and travelers of the detours, bypasses, alternate routes, delays, and confusion in general that they will likely encounter? Provide a timetable for installation of signage.
- What other outreach efforts will be made to inform the community and visitors?
- Describe the impact that construction is expected to have on public transit routes, pick-up sites, and timetables.
- What measures will be taken to ensure pedestrian and other non-motorized access around and through the construction site during the construction period? How will those routes be determined? How will they be posted or designated?
- How will construction noise, dust, fumes, be minimized as to respect and protect the health and safety of those in surrounding neighborhoods?
- Will MDOT identify one central office and person that will be assigned the duty of receiving and responding to complaints and concerns that are filed by residents and visitors? How will the public and visitors be made aware of this individual's

telephone number? Will a web site be established to provide the public with information on project schedules, current traffic delays caused by construction, and allow questions or complaints to be filed and monitored?

- How will complaints be responded to?
- What avenues will there be available for someone to appeal a decision made on a complaints?
- Will this individual be available 24 hours a day? If not, what provisions will be made to receive and respond in a timely manner to complaints filed during ‘off’ hours?
- Will construction impede boat traffic on the Black River?
- Explain how construction will affect 10th Avenue, Gratiot, Hancock, etc.? How will traffic be routed around these areas and for how long?
- Consider constructing the Welcome Center in median between east and west bound I-94. This will aid in ease of returning to the Port Huron and Fort Gratiot areas.
- Will clearances from the Black River surface to the underside of I-94 bridges be maintained or increased to allow passage by boats?
- Will construction impede boat traffic on the Black River?

Section 3.22 The Relationship Between Local Short-Term Uses of the Human Environment and the Maintenance and Enhancement of Long-Term Productivity

- Describe the impact that the development (during construction and upon completion) on the reach of the retail marketplace along M-25 from Main Street Port Huron to the north end retail center in Fort Gratiot Township.
- How were these impacts determined?
- Define the existing retail market reach for retail centers north and south of the existing plaza from Griswold to the north end retail center in Fort Gratiot. How were these market studies completed?
- Describe how consumer trips and shopping patterns within these two retail centers are expected to be affected upon completion of the plaza project, and during the construction period.
- Translate these resulting affects into spending and employment estimates.
- What areas of the county can expect to see retail development resulting from a shift in shopping patterns?
- What economic opportunities might the community realize as a result of this plaza project?
- Translate those opportunities into industries, employment classifications and numbers, and overall economic impact in dollars.
- Describe the assistance that MDOT and its project partners will provide to the community to realize the economic opportunities that have been identified. (Programmatic and fiscal)
- Identify the minority and low income households in the study area. (Since the US Census is seven years old we would encourage a door to door survey be

conducted of the study area and within a reasonable distance surrounding the study area.)

- Identify health or human services delivery centers within the study area and within one quarter mile of the study area.
- How will these delivery centers be affected by the relocation of low and moderate income households?
- How will relocated health and human service center consumers be affected by relocations?
- What steps will be taken to ensure no reduction in service levels or availability to consumers or health and human service providers?
- Describe changes that may occur within existing public transit routes as a result of the proposed project.
- What assistance will be provided (financially and programmatically) to ensure access to the transit system for riders and access to routes by the transit agency upon completion of this proposed project?
- What steps will be taken to enhance existing non-motorized access through this proposed project area?
- How will plaza and roadway design be accommodated to enhance existing local access provided to travelers and visitors on I-94/69 and across the Blue Water Bridge?
- How will the proposed project add to resident and visitor experiences to the greater Port Huron area?
- What measures will be taken to ensure that the experience is enhanced into the future?
- Describe the social and cultural disparities that could evolve as a result of the physical obstacles that this proposed project will define through emphasis of a north and south end of the community?
- What steps will MDOT take in the design of the facility to strengthen community and neighborhood unity across this physical line of demarcation?

Additional Comments/Questions:

- Describe the impact that the development (during construction and upon completion) on the reach of the retail marketplace along M-25 from Griswold to the north end retail center in Fort Gratiot Township, Metcalf Road. How were these impacts determined?
- Define the existing retail market reach for retail centers north and south of the existing plaza from Main Street Port Huron to the north end retail center in Fort Gratiot. How were these market studies completed?
- Describe how consumer trips and shopping patterns within these two retail centers are expected to be affected upon completion of the plaza project. Translate these resulting affects into spending and employment. What areas of the county can expect to see retail development resulting from a shift in shopping patterns?
- What economic opportunities might the community realize as a result of this plaza project? Translate those opportunities into industries, employment classifications and numbers, and overall economic impact in dollars.

- Describe the assistance that MDOT will provide to the community to realize the economic opportunities that have been identified. (Programmatic and fiscal)
- Identify the minority and low income households in the study area. (Since the US Census is seven years old we would encourage a door to door survey be conducted of the study area and within a reasonable distance surrounding the study area.)
- Identify health or human services delivery centers within the study area and within one quarter mile of the study area. How will these delivery centers be affected by the relocation of low and moderate income households? How will relocated service center consumers be affected by relocations? What steps will be taken to ensure no reduction in service levels or availability to consumers or service providers?
- Describe changes that may occur within existing public transit routes as a result of the proposed project.
- What assistance will be provided (financially and programmatically) to ensure access to the transit system for riders and access to routes by the transit agency upon completion of this proposed project?
- What steps will be taken to enhance existing non-motorized access through this proposed project area?
- How will plaza and roadway design be accommodated to enhance existing local access provided to travelers and visitors on I-94/69 and across the Blue Water Bridge?
- How will the proposed project add to resident and visitor experiences to the greater Port Huron area? What measures will be taken to ensure that the experience is enhanced into the future?
- Describe the social and cultural disparities that could evolve as a result of the physical obstacles that this proposed project will define through emphasis of a north and south end of the community? What steps will MDOT take in the design of the facility to strengthen community and neighborhood unity across this physical line of demarcation?

Section 3.23 – Permanent and Lasting Commitments of Resources

- After construction, how will local response agencies be alerted to spills or release of hazardous substances?
- How will surrounding neighborhoods be made aware of releases of hazardous substances? (i.e., alert sirens)
- What support will there be provided to local response teams after construction for activities related to release of hazardous substances within the study area?
- What support will be offered to compensate for permanent adjustments to transit routes and access to transit by riders?
- What long-term and permanent steps will be taken to minimize the adverse effects of lighting, increased noise, and a growth in noxious fumes around the plaza and the corridor? Where can complaints be filed and how can they be expected to be responded to?

- On page 3.23-2, the DEIS states that the commitment of various resources is “based on the concept that residents in the local region around the Blue Water Bridge Plaza, the State of Michigan and Province of Ontario, and the United States and Canada will benefit from these improvements.” However, there does not seem to be a lot of substantive data to support the concept that these entities are benefiting from the preferred alternative. In many cases, the potential or perception of benefits is discussed – not actual proof of benefit.
 - Elaborate and provide objective evidence that the City of Port Huron, the surrounding communities, the relocated residents and employees, the State of Michigan, the United States, and Canada will actually benefit from these improvements.

Additional Comments/Questions:

- After construction, how will local response agencies be alerted to spills or release of hazardous substances?
- How will surrounding neighborhoods be made aware of releases of hazardous substances? (i.e., alert sirens)
- What support will there be provided to local response teams after construction for activities related to release of hazardous substances within the study area?
- What support will be offered to compensate for permanent adjustments to transit routes and access to transit by riders?
- What long-term and permanent steps will be taken to minimize the adverse effects of lighting, increased noise, and a growth in noxious fumes around the plaza and the corridor? Where can complaints be filed and how can they expect to be responded to?

Section 3.24 – Energy/Sustainability

Additional Comments/Questions:

- How will this project impact energy consumption for the immediate neighborhoods? For the city? For the neighboring townships?
- What kinds of energy will be used to meet the completed project’s energy needs? Describe whether it will be used for heating, manufacturing, etc.
- What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any.
- Will the project result in solar power interference where nearby properties will be shaded as a result of the proposal? If this may occur, please describe which properties will be affected and the degree this is likely to occur?
- What steps will be taken to maximize energy efficiency for structures and amenities at the project site?

CHAPTER 4 – SECTION 4(f) AND 6 (f) EVALUATION

Section 4.4 E.C. Williams House

Section 4.4.2 What are the Project impacts on the E.C. Williams House?

The City West Alternative will require the full acquisition of the property and relocation of the historic building – MDOT has proposed relocating the house from its historic location to preserve the structure, but the SHPO has determined that this will constitute an Adverse Effect on the property, although it is preferable to demolishing the house. Mitigation efforts have been established through the coordination of MDOT and FHWA with SHPO. SHPO has requested additional work be done to ensure that adverse effects of the project are adequately addressed.

- Additional work by MDOT and FHWA should be completed and SHPO issues resolved as it relates to each alternative prior to issuance of the final EIS and selection of a preferred alternative.
- Describe outstanding issues as defined by SHPO.

CHAPTER 5 - MITIGATION

Mitigation chapter is severely lacking substantial content. Most of the language speaks in generalities and does not offer specific mitigation actions for specific impacts.

The DEIS mentions that further mitigation issues will be explored. Those issues should have been explored in this DEIS.

- All mitigation issues mentioned as needing further exploration should be resolved and documented prior to issuing the final EIS and selection of a preferred alternative.

Section 5.2 – How Are Right-Of-Way Acquisitions And Relocation Impacts Mitigated?

- What “appropriate measures” will be taken to ensure that all eligible displaced individuals/businesses/non-profit organizations are advised of the rights and benefits available and course of action open to them?

Section 5.3 How Are the Aesthetics and Visual Conditions Mitigated?

- DEIS states “Mitigation of aesthetic and visual impacts **could** come in many forms. Some of the more common measures **could** include...” The bulleted-list following this lead-in are simply generic mitigation measures that could be considered down the road.
 - What specific actions will MDOT take to mitigate adverse impacts to the aesthetic and visual character of the plaza, the surrounding neighborhood, and the overall character of the city?
 - How will MDOT ensure that viewsheds, historical entities, and cultural resources are protected and/or enhanced?
 - How will community character be developed or discovered by MDOT?
 - How will that character be translated into physical elements?
 - What efforts are being made to reach out to local entities that can assist with identifying historically and culturally significant sites and structures?
 - How will properties currently within sight of the properties to be developed be protected from this development through design elements?
 - How will the design itself offer that ‘protection’?
- There are no specific mitigation measures mentioned to prevent light pollution aside from some general lighting discussion in Section 3.8 earlier in the DEIS. There are no specific mitigation measures discussed to deal with managing storm water on a footprint that will increase impervious surfaces. There are no specifics given for mitigating adverse impacts to air quality or other environmental resources. There are no mitigation specifics for the adverse impacts to businesses

in both Port Huron and its surrounding communities, particularly the north end, which will be “cut off” by the expanded plaza.

- What specific mitigation actions will be taken to minimize potential hazards, increased storm water runoff as a result of increased impervious surfaces, lighting, air quality, noise, vibration, sound, and wildlife habitat?
 - What specific mitigation actions will be pursued to ensure that local businesses in Port Huron, Fort Gratiot, Port Huron Township, and other St. Clair County communities will not be adversely affected as a result of each alternative that is under consideration?
 - Have baseline studies been conducted of air quality within the project footprint?
 - Within one quarter or one half mile of the project footprint?
 - What are the results of these studies? What steps will be taken to protect surrounding land uses from adverse impacts of decreased air quality and increased particulate materials?
 - What systems will be deployed to alert the surrounding community of air quality emergencies?
 - How will construction activities be managed to minimize noise in surrounding neighborhoods?
 - What steps will be taken to minimize the impacts of noise on surrounding land uses, residents, and businesses?
- Lighting: A photometric plan must be developed that minimizes light intrusion. A plan that significantly reduces light intrusion from its current level should be targeted.
 - What specific measures will be taken to guarantee that light pollution is reduced from its current levels? All means available should be employed to guarantee that effective lighting be installed that also reduces light pollution, off-site and overhead.

Additional Comments/Questions:

- Design and construct a plaza and gateway corridor that is respectful of and sensitive to the natural and built environment, as well as the heritage of the area.
- Create a facility that projects Michigan’s and the region’s heritage, that illustrates progress, that welcomes visitors and sets the state for their trip to the U.S., Michigan, and St. Clair County. Do not design and build a facility that resembles a “check-point”, a warehouse, a storage yard/depot, or has an industrial feel to it.

Section 5.4 How Will Air Pollution be Controller During Construction?

- Particulate Matter 2.5 emissions: The implementation of a construction emissions reduction plan **must** be considered to target emissions from construction sources.

- How will MDOT guarantee that such a plan is developed and implemented at the project location for the duration of construction?
- Nuisance Odors: Contractors must be required to use methods to control nuisance odors and unnecessary air pollution associated with diesel emissions from construction equipment.
 - How will MDOT guarantee that such a plan is developed and implemented at the project location for the duration of construction?
 - Will one central local office be identified to receive and respond to complaints? How will that information be distributed to neighbors and host municipalities?

Additional Comments/Questions:

- What mitigation steps will be taken to ensure that increased traffic and 'stacking capacity' does not degrade existing air quality?

Section 5.5 – How Will Traffic Noise be Mitigated?

- Much attention must be paid to ensuring the positive aesthetic quality of any noise barriers, keeping in mind the national and local economic significance of this corridor.
 - To what degree are accommodations available for the design and construction of innovative sound walls? When practical, where and how will berms and natural sound barriers (trees) be applied to mitigate noise pollution?

Section 5.6 – How will Noise and Vibration be Controlled During Construction?

- Independently performed basement surveys should be honored for those residences/businesses that are not identified by MDOT to be prone to construction-related vibration damage.

Section 5.7 – What Measures Will Be Taken To Protect Water Quality?

- While scupper drains will not be used on the bridge portion over the Black River, storm water runoff will be collected and channeled down the slope adjacent to the river.
 - What kind of pretreatment of this runoff (i.e., vegetative controls) would be utilized prior to it being introduced directly to the river?
 - What kind of unique design alternatives will be considered for storm water detention basins constructed under any of the considered alternatives? In other words, will detention resemble anything other than your typical

'water placed in jail' design where detention basins are designed void of aesthetics and surrounded by fences?

Section 5.9 – What measures will be taken to Protect Floodplains, Streams, and Drain Crossings?

Additional Concerns/Questions:

- How will impacts to the floodplain(s) be mitigated?
- How will floodplain mitigation be monitored for success?
- How will unsuccessful flood plain mitigation be corrected if it is determined to be unsuccessful?
- How will successful floodplain mitigation be determined?

Section 5.11 – How are Wetlands Mitigated?

- There is no consideration given to the option of Wetlands Preservation credits which, under Michigan law, allows low-quality wetlands to be mitigated by the purchase of existing high-quality wetlands that will be permanently protected by Conservation Easement. While this requires mitigation at a 10:1 ratio, it could be quicker and less costly than trying to construct man-made wetlands for mitigation.

- Why is this mitigation option not discussed in this section?

Additional Concerns/Questions:

- What type of mitigation will be implemented if wetlands are destroyed or impacted?
- Will mitigated wetlands remain within the project area so impacts are minimized? Will they at least remain within the subwatershed?
- Will walkways, signage or other education initiatives be incorporated into the construction of any mitigated wetlands so that the public will be encouraged to learn about the importance of wetlands?
- How will mitigated wetlands be monitored and maintained for perpetuity, especially in regards to invasive plant species like *Phragmites australis* which is a severe problem for the area?
- Allow the community to develop wet lands of marginal value at an offset ratio equal to 3 acres for every one acre of land (upland as well as wetland) that is taken by the project.

Section 5.12 through Section 5.14

Additional Comments/Questions:

- What measures will be implemented to mitigate any impacts to valuable plants and wildlife or threatened and endangered species?

- Will mitigation for Valuable Plants, Wildlife, and Threatened and Endangered Species remain within the project area?
- How will invasive plants species be deterred from invading impacted areas along the Black River?
- Will native plant seed be used to stabilize impacted areas?
- Will native plant species be incorporated into landscaping areas of the project?

Section 5.17 – How are Hazardous/Contaminated Materials Mitigated?

- While the DEIS speaks of further needed study or Phase II Environmental Site Assessments of listed RECs it does not identify a public process for input on remediation recommendations as an outcome of any findings.
 - How would the public be allowed to provide input on remediation recommendations as an outcome of any findings?
 - Further study of Phase II assessments should be completed prior to release of the final EIS and selection of a preferred alternative.

Section 5.18 – How are Surplus or Unsuitable Materials Disposed?

- St. Clair County's Solid Waste Management Plan does not allow for the exportation of any solid waste generated within the County to any facilities outside of the county for the purpose of disposal. This section does not identify this regulation.
 - How and where will solid waste generated during the construction process be disposed of?

Section 5.23 – Additional Mitigations or Modifications

Additional Comments/Questions:

- Can funding be provided to assist in marketing the area through the local tourism bureau?
- Provide incentives to stimulate and establish an environment that is supportive of businesses that typically grow from opportunities offered through improved border crossing infrastructure.
- Provide permanent source of funding to local communities that will be hosting and providing services, as well as losing tax revenues, to the project area and those areas affected by this project.
- Describe the assistance that would be available to complete the installation of an interoperable communication system allowing federal, state, and local agencies in and around the plaza to communicate with one another.
- Will funds be available to assist in the construction of an ambulance garage at the north end (perhaps Mercy Health Center)?

- Will there be assistance for establishing a Trauma Center north of the plaza to be used in the event of an emergency?
- Formalize a bypass around the plaza connecting the community of Wadhams with Keewahdin and M-25.
- Describe the funding and technical assistance that would be available to the community to assist in developing and implementing an access management plan along M-25 between downtown Port Huron and Metcalf Road.
- Formalize the “signed” M-25 alternate route and work with the appropriate local road agency to develop the resources necessary for long-term maintenance of this alternate route.
- Attain the intended goals of the M-25 and adjoining roads Intelligent Traffic System (I.T.S.) including the integration of timing of traffic control devices in this corridor.
- Widen the M-25 bridge over the Black River Canal to accommodate one additional lane in both directions.
- Consider the development of a water ferry system to move people up and down the Black and St. Clair Rivers.
- Allow the community to develop wetlands of marginal value at an offset ratio equal to 3 acres for every one acre of land (upland as well as wetland) that is taken by the project.
- How will the destruction of public recreational access to the Black River be mitigated?
- How will increased public recreational access to the Black River be incorporated into the project?

Project Mitigation Summary “Green Sheet”

- A certain degree of positive aesthetics should be guaranteed.
- This opportunity should be taken to establish an upgraded noise barrier system more aesthetically appealing than that currently in use along major transportation corridors throughout the state. This does not imply a more costly solution; only a more creative one.
- Included in the MIP must be a coordination plan with local transit providers (BWATC). Blue Water Bus must be involved early in the process to minimize any disruption in services provided.

APPENDIX A: LISTING OF TECHNICAL REPORTS

Section 8 – Wetland Delineation and Functional Assessment Report

- The list of recommendations/observations does not include any discussion of Wetlands Mitigation Preservation Credits which, under Michigan law, allows low-quality wetlands to be mitigated by the purchase of existing high-quality wetlands that will be permanently protected by Conservation Easement. While this requires mitigation at a 10:1 ratio, it could be quicker and less costly than trying to construct man-made wetlands for mitigation.
 - Why is this mitigation option not discussed in this section?

Issues to consider:

- North-South community barrier (perceived or real) will be minimized through the chosen alternative and appropriate design elements.
- Local/County Plans and Zoning will be drastically affected. No mention of mitigation for new planning and zoning is provided MDOT and FHWA should work with host municipalities to adjust plans as necessary.
- Current inspection booths are not staffed to capacity at peak travel times. Is there a commitment by CBP that higher numbers of inspection booths would be staffed during peak travel times?
- The Canadian side of the bridge and the Canadian entrance to the Bridge (off of Highway 402) are routinely staffed by BWBA workers who assist with mitigating traffic flow/congestion problems. Neither the U.S. side of the bridge or the U.S. entrance to the Bridge (off of I-94) is currently staffed by MDOT officials to mitigate traffic flow/congestion problems. (Sometimes there is an MDOT official positioned in a car near the U.S. customs plaza as you approach from the bridge. According to various accounts from local municipal staff who cross the bridge routinely, the individual(s) placed on the side of the bridge near the entrance to U.S. Customs, is nowhere near as effective as their counterparts on the Canadian side of the bridge. Accounts from individuals who have been involved in 30-90 minute traffic tie-ups entering the U.S. from Canada are that delays could easily have been mitigated by someone doing an effective job of directing traffic on the bridge as vehicles approach the customs plaza. Traffic safety is a great concern when drivers are not following sign-designated traffic flow patterns. Again, this could be addressed by having one staff person directing traffic on the bridge where cars are supposed to be in designated lanes (i.e. trucks, nexus, cars).
- Are there any plans to have the U.S. approach to the bridge, and the approach to the U.S. Customs, staffed by individuals who will mitigate traffic flow issues?

APPENDIX B: CONCEPTUAL RELOCATION PLAN

This section simply provides an overview of how many residential, business, and non-profit properties will be relocated. It also mentions that it will follow federal and state requirements in terms of location. There is no discussion on extra efforts that will be made to ensure that relocated families and businesses actually relocate within Port Huron, which could potentially benefit other neighborhoods within the city.

- What steps will MDOT take to ensure that families and businesses that must be relocated will relocate within Port Huron City limits?
- In what ways will MDOT work with other state agencies, local non-profit organizations, local units of government, and other entities to ensure that relocated families and businesses are able to easily relocate to homes and business that are equal to or better than the locations they are losing and within the City of Port Huron?

GENERAL OBSERVATIONS AND COMMENTS

- In several places throughout the DEIS outside studies of information sources are cited but associated findings and data are not included. All cited studies and information sources should be attached to the DEIS and distributed for public review prior to selection for a preferred alternative and release of the final EIS.