

## SECTION 5

### MITIGATION OF IMPACTS

The goal of mitigative measures is to preserve, to the greatest extent possible, existing neighborhoods, land use, and natural resources, while making improvements. Although some adverse impacts are unavoidable, MDOT, through environmental review, design, and construction processes, takes precautions to protect social and environmental systems. Construction activities that include the mitigation measures listed below are those currently contained in the MDOT 2003 “Standard Specifications for Construction.”

Further agency coordination will continue through the design stage. Design plans will be reviewed by many MDOT personnel prior to contract letting in order to incorporate any additional social, economic, or environmental protection items. Construction sites will be reviewed to ensure that the mitigation measures proposed are carried out and to determine if additional protection is required. More mitigation measures may be developed if additional impacts are identified. Specific mitigation measures will be included in the design plans and permit applications. A Project Mitigation Summary “Green Sheet,” which identifies proposed project specific mitigation, is included at the end of Section 5.

*MDOT has agreed to participate along with FHWA in a set of enhancements in the community. These are also discussed at the end of Section 5 and at the end of the Green Sheet.*

#### 5.1 Right-of-Way Acquisition and Relocation Impacts

A Conceptual Stage Relocation Plan has been prepared and can be found in Appendix B. The following standard procedures will be followed.

Compliance with State and Federal Laws – Acquisition and relocation assistance and services will be provided by MDOT in accordance and compliance with Act 31, Michigan P.A. 1970; Act 227, Michigan P.A. 1972; and the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 as amended; Act 149, Michigan P.A. 1911, as amended; and, Act 87, Michigan P.A. 1980, as amended. MDOT will inform individuals, businesses and non-profit organizations of the impact, if any, of the project on their property. Every effort will be made, through relocation assistance, to lessen the impact when it occurs.

Residential – MDOT is required by statute to determine the availability of comparable, decent, safe and sanitary housing for eligible displaced individuals. MDOT has specific programs to implement the statutory and constitutional requirements of property acquisition and relocation of eligible displacees. Appropriate measures will be taken to ensure that all eligible displaced individuals are advised of the rights and benefits available and courses of action open to them.

Business and Non-profit Organizations – MDOT is required by statute to offer relocation to displaced businesses and non-profit organizations (none in the case of the DIFT Preferred Alternative). MDOT has specific programs that will implement the statutory and constitutional requirements of property acquisition and relocation of eligible displacees. Appropriate measures will be taken to ensure that all eligible displaced businesses are advised of the rights, benefits, and courses of action open to them. Displaced businesses will be encouraged to relocate within the same community.

Purchasing Property – MDOT will pay just compensation for fee purchase or easement use of property required for transportation purposes. “Just compensation” as defined by the courts is the payment of “fair market value” for the property rights acquired, plus allowable damages to any

remaining property. “Fair market value” is defined as the highest price estimated, in terms of money, the property would bring if offered for sale on the open market by a willing seller, with a reasonable time allowed to find a purchaser, buying with the knowledge of all the uses to which it is adapted, and for which it is capable of being used.

Relocation Information – A booklet entitled “Your Rights and Benefits” detailing the relocation assistance program can be obtained from the Michigan Department of Transportation, Real Estate Division, P.O. Box 30050, Lansing, Michigan, 48909 or phone (517) 373-2200. It is online at: <http://www.michigan.gov/mdot>. Click on “Doing Business” (left side), then click on “Real Estate” (middle), then scroll to the bottom and click on “Your Rights and Benefits.”

Property Acquisition Information – A booklet entitled “Public Roads & Private Property” detailing the purchase of private property can be obtained from the Michigan Department of Transportation, Real Estate Division, P.O. Box 30050, Lansing, Michigan, 48909 or phone (517) 373-2200. It is online at: <http://www.michigan.gov/mdot>. Click on “Doing Business” (left side), then click on “Real Estate” (middle), then scroll to the bottom and click on “Public Roads, Private Property.”

## 5.2 Walls for Terminal Security

*Walls for terminal security will be provided under the Preferred Alternative as an integral part of the proposed project. At the Livernois-Junction Yard, they will be along the north side of the terminal where there are residential sections. The walls will be defined in height to abate noise (per MDOT’s Noise Policy), as well as provide security. In the Kronk Street area, this involves a 1,700 foot wall 12 feet high.*

## 5.3 Soil Erosion and Sedimentation Control

Accelerated sedimentation caused by project-related construction will be controlled before it enters a water body or leaves the highway right-of-way by the placement of temporary or permanent erosion and sedimentation control measures. MDOT has developed a series of standards for erosion control items to be included on design plans. The design plans will describe the erosion controls and their locations. Payment is made to the contractor for construction and maintenance of items used from this list of items specifically developed for the project.

MDOT has on file with the Michigan Department of Environmental Quality (MDEQ) an approved operating erosion and sedimentation control program which ensures compliance with Part 91, Soil Erosion and Sedimentation Control of Act 451, as amended. MDOT has been designated an “Authorized Public Agency” and is self-regulated in its efforts to comply with Part 91. However, MDEQ may inspect and enforce soil erosion and sedimentation control practices during construction to ensure that MDOT and the contractor are in compliance with Part 91 and the acceptable erosion and sedimentation control program.

Work done by the railroads on their own property will require compliance with Act 451, Part 91, Soil Erosion & Sediment Control.

The following is a list of the mitigation measures for this project to be carried out in accordance with permit requirements. Note that other measures may be determined necessary and added during the design phase.

1. All construction operations will be confined to the project right-of-way limits or acquired easements.

2. Areas disturbed by construction activities will be stabilized and vegetated as soon as possible during the construction period in order to control erosion.
3. Special attention will be given to protecting natural vegetative growth outside the project's construction limits from unnecessary removal or siltation. Natural vegetation, in conjunction with other sedimentation controls, provides filtration of highway runoff.
4. Protection of storm sewer inlets will be done to prevent sediment from entering the storm sewer system.
5. The contractor is responsible for preventing the tracking of material onto local roads and streets. If material is tracked onto roads or streets, it shall be removed.

## 5.4 Environmental Permits

*Environmental permits for the Preferred Alternative will be obtained prior to construction activities to ensure appropriate steps are taken to protect existing/remaining resources. Impacts on wetlands will require permits under federal and state law:*

### Federal

- Executive Order 11990 (Wetland Protection)
- Clean Water Act of 1977, as amended: Section 401, State Water Quality Certification; Section 402(p), National Pollutant Discharge Elimination System, storm water permit; and, Section 404, related to dredge and fill.

Federal Executive Order 11990 on Wetland Protection states that when federal funds are used on a project, allowing impacts to any wetland (regardless of size) will require that there be no practicable alternative to impacts on that wetland.

Section 401 of the Clean Water Act of 1977, as amended, requires certification from the state's water quality agency (MDEQ) to ensure that the discharge of dredged or fill material complies with the provisions of the Federal Water Pollution Control Act.

Section 402(p) of the Clean Water Act and subsequent regulation under 40 CFR 122.26 requires a National Pollutant Discharge Elimination System Storm Water discharge permit for construction projects that involve land clearing or disturbance of one acre or greater. Permit application requirements include: 1) a location map and description of the nature of the construction activity; 2) location of the proposed discharge; 3) total area of the site and area to be disturbed; 4) an estimate of the runoff coefficient of the site and the increase in impervious area after construction is complete; and, 5) the nature of the fill. The intent of these requirements is to reduce impacts on water quality during and after construction.

State – Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended:

- Part 55, Air Pollution Control
- Part 303, Wetlands Protection

A Part 55 Air Pollution Control permit-to-install, or general permit, is required for any portable bituminous or concrete plant or crusher. Also see Section 5.12.

A Part 303 Wetland permit is required for any wetland disturbance, temporary as well as permanent.

## **5.5 Existing Vegetation**

The existing natural and ornamental vegetative cover will be retained wherever and whenever possible within the public right-of-way limits. Where the existing ground cover must be removed, replacement vegetation will be established in a timely manner, using seed and mulch or sod.

Trees within public right-of-way will be saved as long as safety requirements are met. All property owners will be notified before any trees in front of their residences are removed and will be offered replacement trees to help offset the aesthetic and/or functional loss of the trees.

Replacement tree species, numbers, and planting recommendations will be made jointly by MDOT's Roadside Development Section and the Region Resource Specialist as part of the project design process following contact and coordination with adjacent property owners. For those owners who request replacement trees, the trees are to be replaced (with the property owners' approval) on their property as close to the right-of-way line as possible. The property owners will then assume the responsibility for maintaining these trees.

## **5.6 Disposal of Surplus or Unsuitable Material**

Surplus or unsuitable material generated by the removal of structures, trees, etc., will be disposed of in accordance with the following provisions designed to control the possible detrimental impacts of such actions. When surplus or unsuitable material is to be disposed of outside of the right-of-way, the contractor will obtain and file with MDOT written permission from the owner of the property on which the material is to be placed. In addition, no surplus or unsuitable material will be disposed in any public or private wetland area. Inert material may be used as a basement fill to a depth not less than three feet below the ground level, if the basement is not within the roadway cross section. Such material must be covered with at least three feet of clean soil to fill voids. Basement walls are to be removed to ground level. All regulations of the MDEQ governing disposal of solid wastes will be complied with.

## **5.7 Groundwater Quality**

The sealing of water wells, septic systems, and sewer lines for the protection of groundwater quality will be ensured by the enforcement of MDOT specifications imposed on the contractor during construction. For houses or other structures with sewer service that are relocated or must be razed, sewer lines will be filled with concrete grout at the basement level, and water will be turned off at the street. In rural areas, the sewer line to the septic tank must be filled at the basement level. Abandoned water wells will be filled with grout applied from the bottom upwards through a conduit extended to the bottom of the well in one continuous operation until the well is filled. The contractor must also meet all local and Michigan Department of Community Health (MDCH) requirements.

Contractors will generally be allowed 60 to 90 days following issuance of the demolition contract for the site to be completely cleared. However, no more than 48 hours will be permitted following removal of any structure to fill the foundation to ground level. If the foundation is not filled within this time, MDOT will take independent action to fill the foundation, charging costs incurred to the contractor. The MDEQ notification procedures for demolitions will be followed.

The above specifications have been approved by the Michigan Department of Community Health. The contractor will also be referred to the local health department for assistance when special conditions such as flowing wells or wells with a high artesian head are encountered. If high water

tables are encountered in cut sections, special methods will be used to reduce any negative effects on the area groundwater.

Drainage structures will be built as necessary along the pavement to drain the roadway sub-base. Edge drains will be used to intercept horizontal seepage. Stone baskets will be used to maintain and reroute the flow of springs when found below the roadway. Intercepted water will be discharged into an available storm sewer.

## **5.8 Surface Water Quality**

Adequate soil erosion and sedimentation control measures will be implemented. A combination of detention basins, sediment basins and vegetated ditches will be used to promote infiltration, thereby reducing the potential impacts on water quality from added runoff and associated pollutants, including deicing salts and heavy metals. The runoff from the terminals is currently discharged and, in the future, will continue to be discharged to combined sewer systems, which treat the wastewater at the municipal treatment plants before being discharged. Runoff flow rates will not be increased. This will be ensured by constructing onsite detention areas or holding stormwater onsite in underground pipes.

*The railroads may choose to carry stormwater directly to the Rouge River through pipes in their own right-of-way. The railroads would be subject to National Pollutant Discharge Elimination System (HPDES) permitting.*

## **5.9 Maintaining Traffic During Construction**

*The disruption of traffic in the construction area will be minimized to the extent possible. All construction areas and altered traffic patterns will be clearly marked during the construction phase. A preliminary construction staging program for the Preferred Alternative has been developed and is the subject of ongoing review to ensure the constructability of the project and minimize impacts to the local neighborhoods and the motoring public. The preliminary staging plan expects project implementation to begin in 2010 and conclude in 2019. Modification of the I-94/Livernois Avenue ramps in the northeast and northwest quadrants of the interchange is expected to be accomplished in one construction season (March through November). Lonyo will not be closed before construction of the Central Avenue underpass is complete. The underpass is expected to take up to three years to construct.*

## **5.10 Continuance of Public Utility Service**

Utilities will require relocation or adjustment. In doing so, coordination between MDOT and the affected utility company will take place during design, prior to actual construction. Proposed staging plans will also be presented to utilities to make them aware of the project. Service to the project area will be maintained with temporary connections during construction so service interruptions will be minimized.

## **5.11 Construction Noise and Vibration Impacts**

Construction noise also will be minimized by measures such as requiring that construction equipment have mufflers; that portable compressors meet federal noise-level standards for that equipment; and, that all portable equipment be placed away from or shielded from sensitive noise receptors, if at all possible. All local noise ordinances will be adhered to.

Where pavement must be fractured, structures must be removed, and/or piling or steel sheeting must be driven, care will be taken to prevent vibration damage to adjacent structures. In areas where construction-related vibration is possible, basement surveys will be offered. These areas will be identified during the design phase and surveys would be offered before construction begins to document any damage caused by MDOT construction. Geotechnical analysis conducted for the project will aid in the understanding of potential vibration impacts and mitigation. Vibration impacts will be reviewed further during the design phase. Vibration impacts are not anticipated at this time.

## **5.12 Control of Air Pollution During Construction**

The contractor will be required to comply with all federal, state and local laws and regulations governing the control of air pollution.

*Dust Control:* During construction of any project, adequate dust-control measures will be maintained to avoid detriment to the safety, health, welfare, or comfort of any person, or cause damage to any property or business.

*Bituminous and Concrete Plants:* All bituminous and Portland cement concrete proportioning plants and crushers must meet the requirements of the rules of Part 55 of Act 451, Natural Resources and Environmental Protection. Any portable concrete plant must meet the minimum 250-foot setback requirement from any residential, commercial, or public assembly property or the contractor is required to apply for a permit to install from MDEQ. Portable crushers must have a setback of 500 feet or more for a general permit; otherwise, a permit to install is required. Asphalt plants must have a setback of 800 feet or more or a site specific permit is required. The permit process, including any public comment period, if required, may take up to six months. Dust collectors must be provided on all bituminous and concrete proportioning plants. Dry, fine aggregate material removed from the dryer exhaust by the dust collector will be returned to the dryer discharge unless otherwise directed by the engineer.

*Construction emissions may represent a large new source of PM<sub>2.5</sub> emissions. The implementation of a construction emissions reduction plan may be considered to target emissions from construction sources. This plan might include actions such as: retrofitting off-road construction equipment; using ultra-low sulfur fuels for all equipment; limiting the age of on-road vehicles used in construction projects; minimizing engine operations; restricting construction activities around certain more sensitive receptors; instituting fugitive dust control plans; using diesel particulate traps and oxidation catalysts; and, using existing power sources or clean fuel generators, rather than temporary power generators.*

## **5.13 Wetland Mitigation**

Preliminary consultation regarding mitigation for wetlands was undertaken during delineation of wetlands. Mitigation of proposed wetland impacts has involved: 1) avoidance of wetlands where feasible, 2) minimization of unavoidable impact by adjustments to the project alignment and typical section, and 3) compensatory wetland construction or restoration. The first two steps have been integral to project development. Specific mitigation measures will be done in accordance to all applicable statutes administered by appropriate agencies.

Wetland areas were evaluated and maximum efforts were made to avoid and minimize wetland impacts. Minimization of wetland impacts during construction will be further accomplished by soil erosion and sediment control practices consistent with MDOT's Soil Erosion Program.



Compensatory wetland restoration or creation is planned, in accordance with state and local wetland protection ordinances, to mitigate unavoidable impacts to approximately 0.01 acres of wetlands at the Livernois-Junction Yard. This area is made up of marginal wetlands of minor ecological significance. These wetlands are proposed for mitigation at a 1:1 ratio, so there is a requirement to replace 0.01 acres.

MDOT, through a cooperative agreement with MDEQ, would build or restore compensatory mitigation for unavoidable wetland impacts using a “Moment of Opportunity” site allowed under the General Permit Category of Part 303 of P.A. 451 (1994, as amended).

## **5.14 Contamination**

A *Project Area Contamination Survey* (PACS), or Level I Environmental Site Assessment was conducted for the DIFT Project to determine if any known or potential sites of environmental contamination exist that could affect the project design, cost, or schedule. The PACS covered existing right-of-way (ROW), proposed fee ROW, proposed grading permits and proposed easements. The PACS process included field reconnaissance with business owners, review of federal and state records, and review of historical land use records.

*Investigations were done for 67 individual sites and up to 19 sites have been identified for a Phase II survey, under the Preferred Alternative. Additional soil borings will be required to further identify potential contamination on sites to be acquired. Contamination areas will be marked on all construction plans. A Utility Plan will also be prepared to ensure no deep utility cuts will impact and/or spread existing contamination. A Risk Assessment Plan will be developed to include a Worker Health and Safety Plan. All contaminated materials will be properly disposed of. All monitoring wells will be properly sealed and abandoned.*

## **5.15 National Geodetic Survey Monuments**

The project area will be reviewed prior to construction to determine whether any U.S. Department of Commerce, National Geodetic survey monuments (<http://www.ngs.noaa.gov>) will be disturbed. If so, 90-day notification will be given to the Department of Commerce.

## **5.16 Cultural Resources**

*The Michigan Box Company and the house at 6332 Kronk are eligible for listing on the National Register of Historic Places and will be affected by the Preferred Alternative. Coordination with the SHPO will continue, consistent with the updated Memorandum of Agreement in Appendix C in order to document impacts and mitigation measures.*

## **5.17 Additional Mitigation or Modifications**

The final mitigation package will be reviewed by division representatives on the MDOT project study team, in cooperation with concerned state, federal, and local agencies.

Some changes to the early mitigation concepts discussed in this document may be required when design proceeds. These mitigation concepts will be implemented to the extent possible. Where changes are necessary, they will be designed and field reviewed before permits are applied for or construction begins.

These preceding mitigation concepts are based on the best information available through September 2009.

It is noted elements that are part of each terminal's design (paving, lighting, walls for security, Central Avenue underpass) are covered in a Pre-Development Plan Agreement included as Appendix F. The PDPA is the basis of more detailed agreements, to be developed/executed with individual railroads once the Record of Decision is issued. In those areas around the terminals where Federal Highway Administration Noise Abatement Criteria are exceeded due to terminal activity, the walls will be designed to reduce terminal noise a minimum of 5 dBA.

### **Community Enhancements**

*In response to a proposal advanced by local community members who organized themselves into a group called "Working Group for a Community Benefits Agreement on the Detroit Intermodal Freight Terminal Project," MDOT has agreed to participate along with FHWA in a set of enhancements in the community related to the DIFT Project. A Central Avenue viaduct will allow vehicles to safely pass under the terminal, eliminating the possibility of train/car crashes on Central Avenue. Once the Central underpass is completed, traffic on Lonyo Avenue will be rerouted to Central Avenue, eliminating any future car/train crashes at that location also.*

*Road upgrades will be made including a maximum of \$11 million for improvements to federal-aid local roads that carry DIFT truck traffic and were identified as a priority by community leaders. The DIFT will address the important issue of reducing truck traffic on neighborhood streets by channeling truck movements to I-94 from Livernois Avenue, through the use of directional curbing at the gate entrance. A new gate will be constructed at the west end of the yard, providing direct access to I-94 via Wyoming Avenue.*

*Construction of security walls along the north perimeter of the terminal will minimize visual and noise impacts. Natural buffering in the form of shrubbery and landscaping are also included. MDOT will work together with the City of Detroit in an effort to secure Transportation Enhancement Funds to beautify roadways and greenways near the DIFT.*

*MDOT will participate with other stakeholders, such as the Michigan Economic Development Corporation, the Detroit Economic Growth Corporation, and the Dearborn Department of Economic Development in funding a study of economic development opportunities.*



## Green Sheet: Project Mitigation Summary Detroit Intermodal Freight Terminal (DIFT) FEIS For the Preferred Alternative\*

This Project Mitigation Summary Green Sheet contains the project specific mitigation measures being considered at this time. A list of Community Enhancements that are above and beyond what is required mitigation for this project is included at the end of this Green Sheet. A Final Green Sheet will be prepared and included in the Record of Decision (ROD) for this project. These mitigation items may be modified during the ROD, final design, right-of-way acquisition, or construction phases of the project.

### General Green Sheet Items

<i>Impact Category</i>	<i>Mitigation Measures</i>
<b>I. Social and Economic Environment</b>	
a. Central Avenue Viaduct	The construction of a railroad bridge at Central Avenue will allow vehicles to safely pass under the terminal, eliminating the possibility of train/car crashes on Central Avenue. Rerouting Lonyo Avenue traffic to Central Avenue will eliminate any future car/train crashes at Lonyo also.
b. Visual Effects	Security walls are planned at the Livernois-Junction Yard along the north side and part of the south side. A new perimeter road along the north side will include a landscaped buffer. Security wall construction and construction materials will be discussed with the affected residents in the vicinity of potential construction and local officials during Context Sensitive Solutions (CSS) workshops during the design phase. Directional lighting shall be used adjacent to residential areas.
c. Relocations	Adequate replacement housing and industrial/commercial space is available in southwest Detroit for those residents and businesses who wish to remain in the area. This project would relocate 32 residential dwelling units and 29 businesses. The DIFT Conceptual Stage Relocation Plan can be found in Appendix B of this FEIS.
d. Environmental Justice/Title VI Population Groups	Mitigation and enhancement measures such as landscaping, security walls, and local road improvements will benefit minority and low income population groups and Title VI population groups who will be impacted by this project.
e. Noise	Project noise levels exceed FHWA Noise Abatement Criteria at several locations adjacent to terminals. Walls at the perimeter of the Livernois-Junction Yard are planned as part of the project for security and aesthetic purposes. In noise sensitive areas, these security walls will be designed to also provide noise abatement.**
<b>II. Natural Environment</b>	
a. Wetlands	A maximum of 0.01 acres of impacted wetlands will be replaced under the "General Permit Category" where the mitigation will be rolled into another mitigation project elsewhere in the state. A permit will be obtained from the Michigan Department of Environmental Quality for using this wetland.
b. Tree Removal/Clearing/Landscaping	Mature trees will be preserved where possible. Remaining property owners will be notified before any trees in front of their residences are removed and will be offered replacement trees. Landscaping will be provided along the north perimeter road that will become the connection to John Kronk Street. Landscaping will emphasize native species and not include invasive species.
c. Water Quality	For runoff, stormwater management facilities will include detention in oversized pipes. Stormwater at all terminals flows to combined sanitary/storm sewers presently. Stormwater management will be incorporated into the project's final design and is subject to National Pollutant Discharge Elimination System (NPDES) permitting. Options for pretreated stormwater runoff could include piping stormwater direct to the Rouge River through pipes so that there is no reliance on the Detroit Water and Sewer Department's combined sewer system.
d. Invasive Species	<i>Xerolenta obvia</i> (an invasive land snail) eradication efforts continue in the Livernois-Junction Yard area by the Animal and Plant Health Inspection Service – Plant Protection and Quarantine of the U.S. Department of Agriculture (APHIS-PPQ) in coordination with the railroads. When construction efforts are undertaken by either <u>MDOT or the railroads</u> the local APHIS-PPQ office in Romulus, Michigan will be contacted (734.942.9005) to coordinate with these ongoing eradication efforts.

\* Elements that are part of the Livernois-Junction terminal design (paving, lighting, walls for security, Central Avenue underpass) are covered in a Pre-Development Plan Agreement (PDPA) among MDOT and the participating railroads. The PDPA accompanies this FEIS as Appendix F.

\*\* In those areas around the terminals where Federal Highway Administration Noise Abatement Criteria are exceeded due to terminal activity, the security walls will be designed to reduce terminal noise a minimum of 5 dBA. The principal wall anticipated would be 1,700 feet long and 12 feet high along John Kronk Street, between Martin Street and Livernois Avenue.

<b>III. Hazardous / Contaminated Materials</b>	
a. Contaminated Sites	A <i>Project Area Contamination Survey</i> has been completed. Up to 27 sites will need Preliminary Site Investigations prior to right-of-way acquisition. Contamination areas will be marked on all construction plans. Proper disposal of any hazardous/contaminated material will occur. All monitoring wells will be properly abandoned. A Utility Plan will also be prepared to ensure no deep utility cuts will impact and/or spread existing contamination. A Risk Assessment Plan will be developed which will include a Worker Health and Safety Plan.
<b>IV. Cultural Environment</b>	
a. Historic	The Michigan Box Company building is eligible for listing on the <i>National Register of Historic Places</i> and will be demolished by this project. Coordination with the SHPO will continue in order to develop appropriate mitigation measures. The SHPO will also review plans for the security wall in the vicinity of 6332 Kronk for compatibility. See signed Memorandum of Agreement (MOA) in Appendix C.
b. Archaeology	Ground-disturbing activities will not take place in the vicinity of the Michigan Central Stockyards Hotel site as a part of the DIFT Project. Construction plans will specify that excavation beneath existing disturbance is prohibited in this environmentally sensitive area, and a map depicting the environmentally sensitive area will also accompany the plans. See signed MOA in Appendix C.
<b>V. Construction</b>	
a. Vibration	Basement surveys will be offered in areas where vibration effects could occur by MDOT construction. These areas will be identified during the design phase, where pavement and bridge removal will occur, or where piling and/or steel sheeting is planned. Impacts are not anticipated at this time.
b. Maintenance of Traffic	Modification of the I-94 ramps in the northwest and northeast quadrants of the interchange at Livernois will require temporary detours. The construction of the Central Avenue underpass will require a detour to Lonyo Avenue. Lonyo will not be closed until the Central Avenue underpass is complete.

## Community Enhancements

<i><b>Impact Category</b></i>	<i><b>Enhancement Measures</b></i>
a. Local Roads	In the vicinity of the DIFT Project area, adjacent local roads will be evaluated to determine what improvements are needed to the roadway - including paving, sidewalks, streetscaping, and lighting. MDOT will coordinate with the City of Detroit to determine the scope of work, cost (not to exceed \$11 million), and schedule for the local road improvements. Environmental clearance for the local road improvements will be addressed in future separate clearances.
b. Transportation Enhancement Funds	MDOT will work together with the City of Detroit in an effort to secure Transportation Enhancement Funds to further beautify roadways and greenways in the vicinity of the DIFT.
c. Truck Traffic	The DIFT will also address the important issue of reducing truck traffic on neighborhood streets by channeling truck movements to/from I-94 along Livernois Avenue, through the use of directional curbing at the Livernois gate and by eliminating the Waterman/Dix entrance to the terminal.
d. Livernois-Junction Yard Access	New gates will be constructed at the west end of the yard, providing direct access to I-94 via Wyoming Avenue.
e. Security Walls	Construction of security walls at various locations along the perimeter of the terminal will minimize visual and noise impacts.
f. Economic	MDOT will participate with other stakeholders in funding a study of economic development opportunities that will support small business development in the DIFT study area. MDOT will continue to coordinate with the Michigan Economic Development Corporation, the Detroit Economic Growth Corporation, the Dearborn Department of Economic Development, various public-private partnerships and the local community.
g. Air Quality	<p>MDOT will work with contractors on an operational agreement to control air pollution during construction. A construction emissions plan may include actions such as: retrofitting off-road construction equipment; limiting the age of off-road vehicles used in construction projects; minimizing engine operations; restricting construction activities around certain more-sensitive receptors, like Southwestern High School (when it is in session); using diesel particulate traps and oxidation catalysts; and, using existing power sources or clean fuel generators, rather than temporary power generators. The Contractor will institute fugitive dust control plans per MDOT 2003 Standard Construction Specifications under Section 107.15A and 107.19.</p> <p>MDOT will work with SEMCOG, MDEQ, and the private sector to create an action plan that includes short-term and long-term objectives aimed at reducing fugitive dust, diesel truck idling, fuel consumption, or diesel emissions to limit PM<sub>2.5</sub> emissions in the study area defined by the map shown in Figure 3-16 of this FEIS. The action plan will identify priorities for future federal aid eligible transportation projects through programs such as Congestion Mitigation and Air Quality (CMAQ) and the Midwest Clean Diesel Initiative. The action plan will be implemented during design and construction phases, and sustained through the maintenance and operations of the facilities. Activities could also include outreach activities to inform commercial operations and residents on air pollution control strategies. The actual projects will be generated from the community and its partners who will develop project proposals.</p>
h. Job Training	MDOT will coordinate with the City of Detroit Workforce Development, the Michigan Department of Energy, Labor and Economic Growth to explore job training opportunities, English as a Second Language (ESL), and other training options in the project area.



## SECTION 6

### FINAL SECTION 4(f) EVALUATION

#### 6.1 Introduction

This section describes and evaluates impacts to properties protected by Section 4(f) of the Department of Transportation Act of 1966. The purpose of the Final Section 4(f) Evaluation is to ensure that, where there are adverse effects to protected resources, such as historic sites and publicly-owned public parks, recreation areas, wildlife and waterfowl refuges, all prudent and feasible alternatives to use of such resources have been considered, planning has included all possible measures to minimize harm, and coordination with appropriate agencies has satisfactorily occurred. It is noted the proposed project will not involve any “6(f)” properties, i.e., those benefiting from the use of the Land and Water Conservation Fund Act.

Section 4(f) applies to all historic sites of national, state or local significance, whether or not these sites are publicly owned or open to the public, but except in unusual circumstances, only historic properties on or eligible for inclusion on the *National Register of Historic Places* are protected.

A publicly owned park, recreation area or wildlife and waterfowl refuge must be a "significant" resource for Section 4(f) to apply. Pursuant to 23 C.F.R. 771.135 (c), 4(f) resources are presumed to be significant unless the official having jurisdiction over the site concludes that the entire site is not significant. Even if this is done, FHWA must make an independent evaluation to assure that the official's finding of significance or non-significance is reasonable. The State Fairgrounds was assumed to be significant.

The Federal Highway Administration (FHWA) has determined the project would have a use of the potentially historic properties and recreational resources noted below with Alternatives 2, 3 or 4 (Table 6-1). “Use” of a Section 4(f) property means: 1) permanent incorporation into a transportation facility; or, 2) proximity impacts so severe that the activities, features or attributes that qualify the property are substantially impaired. ***The Preferred Alternative affects only the first entry on the list below:***

- ***Michigan/General Box Company (Spranger/Detroit Wire Wheel Corporation)***
  - 6332 John Kronk Street
  - Federal Screw Works Factory
  - Markey House
  - Tomms House
  - Michigan Central Railroad Bridge Deck
  - Michigan State Fairgrounds (a 4(f) but not a 6(f) property)

The alternatives considered for intermodal terminal development are summarized on Table 1-1 and elaborated upon in Section 1.2, to which the reader is referred.

Expanded intermodal terminals would result in a use of the noted properties. FHWA has consulted with the SHPO to develop measures to minimize harm. This final Section 4(f) document was prepared for processing under the procedures set forth in FHWA regulation 23 CFR 771.135. A Final Memorandum of Agreement (MOA) is included in Appendix C.

**Table 6-1****Potential *National Register* Eligible Cultural Resources and Recreational Resources Adverse Effects**

Alt.	Terminal	Site Name	Location	Description of Area Impacted	<i>National Register</i> Eligibility Criteria <sup>a</sup>	Effect
3/4/ Pref.	Liv-Jct	Michigan Box Company/Spranger Wire Wheel Corporation	7175 Clayton Street	Factory originally built to make auto parts. Now pallets are made at the site.	C	Area needed for Alternatives 3 and 4 would require demolition, which is an adverse effect. Also true for Preferred Alternative.
2/3/4	Liv-Jct	House	6332 Kronk	Historic Home	C	Potential adverse visual effect from placement of wall at terminal edge. SHPO to review.
3	Liv-Jct	Federal Screw Works Factory	3301-3401 Martin Street	Factory originally built to make auto parts. Now a warehouse	A + B	Area needed for Alternative 3 would require demolition of this property.
3	Liv-Jct	Markey House	3504 Martin Street	Historic Home	A + C	The Federal Screw Works Factory across the street would be demolished under Alternative 3 causing an adverse visual effect.
3	Liv-Jct	Tomms House	3434 Martin Street	Historic Home	C	The Federal Screw Works Factory across the street would be demolished under Alternative 3 causing an adverse visual effect.
2	CP/ Expressway	Michigan Central Railroad Bridge Deck	2405 West Vernor Highway	Bridge deck structure associated with Michigan Central passenger station complex.	C	Tracks would be added and modified on the bridge for Alternative 2.
2/4	CN/Moterm	Michigan State Fairgrounds (MSF)	Woodward Avenue and 8 Mile Road	Area used to store new vehicles prior to shipment	Not Applicable	A portion of the area used to store new vehicles prior to shipment that is leased from the MSF, would be required under Alternatives 2 and 4.

<sup>a</sup> See Section 6.3.1.

Source: Commonwealth Cultural Resources Group and The Corradino Group of Michigan, Inc.

## 6.2 Proposed Action and Need for Project

The purpose of the Detroit Intermodal Freight Terminal project is to support the economic competitiveness of southeastern Michigan and the state by improving freight transportation opportunities and efficiencies for business, industry and the military. The goal is to ensure that Southeast Michigan has a facility, or facilities, with sufficient capacity and interconnectivity to provide for existing and future intermodal demand and reduce time, monetary costs and congestion to support the economic competitiveness of Southeast Michigan.

Detroit is now one of the top intermodal markets in the nation. More intermodal traffic could flow through Detroit if the capacity were provided and a plan were developed for a better-connected railroad and highway system. The Detroit market has characteristics that could cause intermodal traffic to grow faster than the national average, including Detroit's role in the automotive industry and strategic position on the Canadian border.

The Michigan Department of Transportation is engaged in the DIFT study to ensure that the businesses and industries involved in the intermodal freight transportation segment of the economy continue to have access to the market (customers, workers, shippers, and the like). This, in turn, will support mobility and maintenance of the Michigan and national economies and national defense as well as a high quality of life for the region's citizens including:



- Providing the necessary infrastructure to support current and future distribution needs of industry, particularly auto manufacturing, the state's largest industry, and other Southeast Michigan businesses.
- Achieving a competitive advantage both regionally and nationally by focusing federal, state, local and private (i.e., railroad and other private entities) investments and resources on an "intermodal" strategy.
- Stimulating economic development and redevelopment throughout Southeast Michigan resulting in job creation, an increased tax base, and lower cost of consumer goods.
- Reducing truck "vehicle miles traveled," which saves lives, reduces pollution and conserves highway capacity.
- Removing intermodal terminal-related truck traffic from the local streets of the nearby neighborhoods so that quality of life issues, such as air pollution and safety, are improved.
- Buffering existing intermodal facility from nearby neighborhoods through improvements that reduce noise and use trees, vegetation and other enhancements to improve the terminal's exterior appearance and security.

The proposed intermodal improvements are needed to handle the increasing intermodal volumes, which have grown from 283,000 lifts (a movement of a container from a truck to a train or vice versa) in 1992 to 348,000 lifts in 2002. The capacity of the existing intermodal terminals in the region is about 345,000 annual lifts. The forecast demand for 2025, if no extraordinarily positive trends occur, would range from about 500,000 to 700,000 annual lifts.

See Section 2, Purpose and Need for Action, for more information.

## 6.3 Description of Resources

### 6.3.1 Historic Resources

The *National Register of Historic Places* (NRHP) was created by the National Historic Preservation Act of 1966 and is administered by the National Park Service. The NRHP has established criteria for determining historic significance. These criteria require a property to have integrity of location, design, setting, materials, workmanship, feeling, and association. Additionally, the property must meet one of the following: Criterion A) be associated with a significant event; Criterion B) be associated with the lives of significant persons; Criterion C) embody the distinctive characteristics of a type, period or method of construction, or represent the work of a master; or, Criterion D) have yielded or be likely to yield information important in history or prehistory (usually archaeological sites). A property typically has to be 50 years old or older to be considered *National Register* eligible. No known *National Register* eligible archaeological sites were found at any of the terminals. ***The SHPO has agreed with the assessment that two archaeological sites at the Livernois-Junction Yard will be unaffected by the Preferred Alternative, as the Baby Mills site is outside the footprint of this alternative and the Stockyards Hotel has likely been buried by railroad activity. Ground disturbing activities will not be conducted in this area. Construction plans will specify that excavation beneath existing ground disturbance is prohibited in this environmentally sensitive area. A map depicting the environmentally sensitive area will accompany the plans.***

A discussion of properties considered eligible and expected to experience adverse effects with the project follows.

**Michigan/General Box Company (Spranger/Detroit Wire Wheel Corporation) 7175 Clayton Street, Detroit – *Adverse Effect by Preferred Alternative***

In 1917 the property at 7175 Clayton was first listed as the site of the Spranger Wire Wheel Company. The business continued under this name through the following year; by 1919, it was redesignated as the Detroit Wire Wheel Company. This latter organization went defunct by the next year, when the building was listed as vacant. This situation remained unchanged through 1924.

Information about the wheel company and its participating officers is scanty. The founder-president of the firm, Nichols M. Spranger, was a successful Detroit physician before, during, and after his venture as a would-be automotive parts manufacturer. His associates in the wheel manufacturing business were Jacob M. Schaefer, vice president; John Reinke, secretary; and William Finzel, treasurer. All three continued with the business as it later transitioned into the Detroit Wire Wheel Corporation. Spranger was, however, replaced as president by Frederick R. Schmalziedt, while J. Robert Wilken was added to the list of officers as General Manager. In 1917, the Spranger Wire Wheel factory was exclusively devoted to automotive supply. The choice of factory location placed the facility adjacent to the railroad and the Prest-O-Light Company's automotive headlamp factory, which was built in 1916.

The footprint of the 7175 Clayton factory building measures approximately 120 ft. by 260 ft. See Figure 4-54 for its location relative to the Action Alternatives. Constructed of brick, the building exhibits a basilica form, common to factory and exhibition hall designs of the period, with a central two-story core paralleled by two side-flanking one-story wings (Figure 6-1). The forward two-story portion of the building is devoted to office space. The stone coping of the front second story parapet exhibits a slight downward slope from center to outer wall, with window groups being arranged in three sash and two sash bays. The second story windows are replacements, with observed first story units consisting of one-over-one double-hung wood sashes. First and second story clerestory windows of the factory segment consist of large triple-frame metal sash bays mounted on brick quarter walls (first story) between the building's multiple wall buttresses. A cantilevered steel H-beam canopy, with metal sash glass windows, defines the first-story storage and loading dock running along the entire west side of the factory component. Decorative embellishments are limited to four pressed concrete, or carved limestone, symbolic wire wheels with Gothic letter "S" hubs affixed at the two-story pier mid-sections.

Exterior structural alterations, in addition to second story window replacements, are limited to a loading dock with a poured concrete base, and constructed of steel beams and concrete block. Located at the northwest corner of the north façade, the loading bays are flat roofed and cut below grade, inclining towards the building from Clayton.

A one-story concrete block wing connects the rear (south) of the factory to a two-story warehouse that is clad with corrugated sheet metal panels. The westerly wall of the latter building curves along an abandoned railroad spur and is pierced by three wide cargo bays. Window bays are numerous, consisting of metal frame sashes. They are restricted to the second story and most are covered with flakeboard panels.

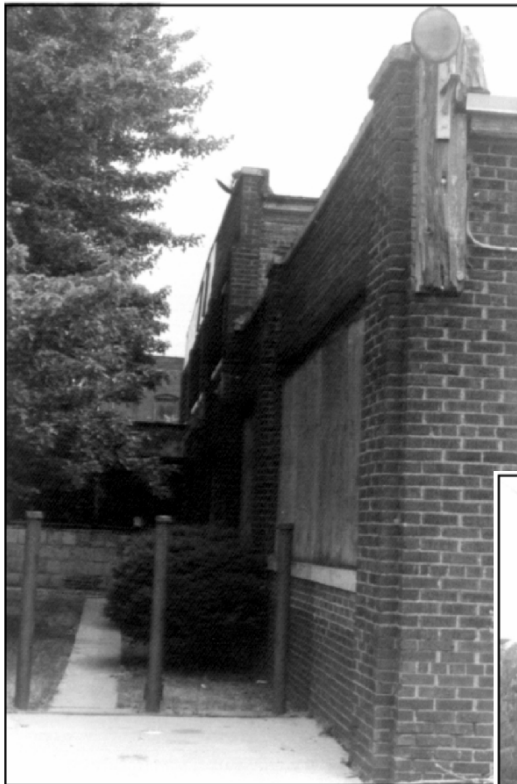
A circular three-story concrete block wood chip storage silo abuts a concrete block "heater" building. Their associated metal tube and hopper feeder assemblies occupy the space between the factory and warehouse. A tall, narrow chimneystack, supported by metal wires, defines the waste incinerator facility housed in the heater building.



West wall, view to northeast.



North wall detail, view to south.



North wall, view to east.



North wall, view to southwest.

Figure 6-1  
Michigan/General Box Company  
(Spranger/Detroit Wire Wheel Corporation)  
7175 Clayton Street

SOURCE: Commonwealth Cultural Resources Group, Inc.

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The wire wheel factory building at 7175 Clayton is a rare example of a relatively unaltered World War I period automotive parts supply facility. Although the business was financially unsuccessful, the building is a historically significant example of an early supply shop that flourished during the initial stages of Detroit area automobile industry growth. This building is considered eligible for listing on the NRHP under Criterion C. However, the adjacent wood stock warehouse and disposal facilities to the rear of the factory are additions unrelated to the auto industry and are non-contributing elements of the property. The SHPO concurred that this site is eligible for the *National Register* (see letter dated October 18, 2004 in Appendix A of the DEIS).

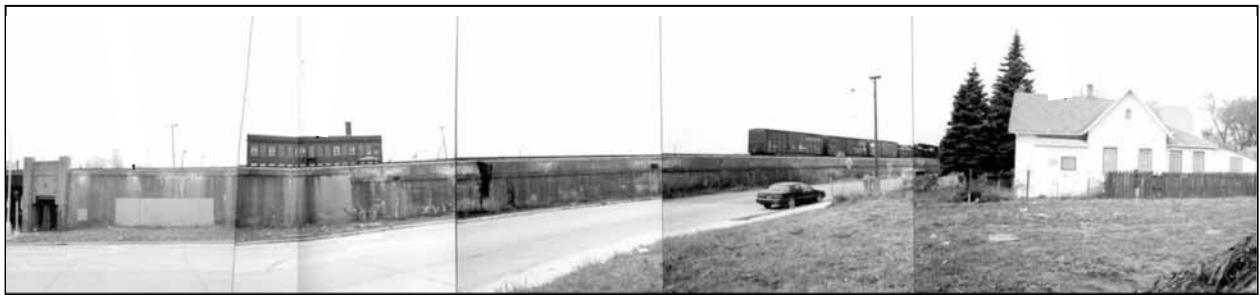
This property is privately owned. It is currently occupied by Fontana Forest Products which produces wooden pallets and containers.

#### **House at 6332 John Kronk – *Not affected by Preferred Alternative***

This one-and-one-half story brick Gabled-Ell dwelling exhibits gothic or pointed, arch gabled vent windows and elliptical arched first floor window bays. The front entry is off-set, though its form is obscured by an enclosed porch addition. The rear of the building is formed by a compound one-story hipped roof addition and a telescoping one-story lean-to roof addition. The building is stylistically eclectic and exhibits both Gothic and Italianate influences.

While the historical associations of the dwelling at 6332 John Kronk Avenue have proven elusive, it is stylistically assignable to the 1873 period of platting for the associated Cicotte, Gilbert and Barkume Subdivision. An example of a 19th Century Detroit worker cottage, brick examples are particularly rare.

Brick dwellings within the project vicinity are exceedingly rare for all periods. During the pre-1920 period, the use of common brick was largely restricted to commercial buildings along Michigan and Livernois avenues and to foundation wall or pier supports for area housing.



6332 John Kronk Streetscape, View to south-southwest toward rail yard from house (house is on the right)

Nineteenth century brick houses are the single tangible reminder of the once significant part that the brick industry played in Springwells Township economics and manufacturing. The dwelling is eligible for listing on the NRHP listing under Criterion C. The dwelling is distinctive in its embodiment of a type, period, or method of construction (Criterion C); specifically the dwelling's distinct style expressing ca. 1865-1875 Italianate influence.

**Federal Screw Works Factory 3301/3401 Martin Street, Detroit – *Not Affected by Preferred Alternative***

Historically the facility at 3301/3401 Martin Street is associated with Federal Screw Works, a manufacturer of fasteners to the auto industry. Federal Screw Works, now headquartered in St. Clair Shores, Michigan, was founded in Detroit in 1917 to produce fasteners. Their primary focus was serving the automobile industry, in particular General Motors and Ford.

The original building in the existing complex was built in circa 1920 at 3401 Martin Street (near the Otis Street intersection). The building housed office, warehouse and machine shop functions in a steel frame and brick building, two stories at the front and one story with monitor at the back (Figure 6-2). The factory was expanded towards Bruckner Street and Southern Street/John Kronk and behind the Martin Street structures, in later years, with one addition on Southern/John Kronk added in 1950.

**Figure 6-2  
Federal Screw Works Factory  
3301-3401 Martin Street**



Source: Michigan Department of Transportation

The Modern/Eclectic five bay 1920 building follows common themes that were translated into office, school, and commercial buildings of the period, doing away with Victorian excess in favor of cleaner, more modern lines. As is common in this modern and somewhat conservative style, the building gains most of its subtle expression from the use of patterned dark brick and limestone and cast stone detailing. Brick pilasters support an implied cornice of brick with cast stone blocks done in a bas-relief of various nuts and bolts and is finished with limestone coping along the parapet. The entrance bay is marked by a slightly projecting entry arcade with simple classical detailing. While the first floor has been modified with the replacement of the original large windows with smaller aluminum units, the original factory building retains good integrity overall.

To the northwest, running to Bruckner Street, is a multiple bay one-story addition with a monitor roof. The date of construction is not clear but may date to wartime expansion in the early 1940s. Each bay carries a single large window opening, currently filled with brick. To the southwest is another addition, date of construction unknown, steel framed with large panel windows, currently carrying opaque panels.

The Federal Screw Works was involved in a divisive and violent strike in the spring of 1938 with national implications and which involved key figures in the labor movement and local government. The factory is considered eligible for inclusion in the NRHP under Criterion A (association with events that have made a significant contribution to broad patterns of our history) and possibly under Criterion B for its association with the lives of persons significant in our past – in this instance for the association with Walter Reuther, during his formative years as President of United Automobile Workers (UAW) West Side Local 174; Stanley Nowak, who was one of the first five organizers hired by the UAW and served ten years in the Michigan State Senate as Michigan's first labor legislator (and twice faced expulsion from the United States in reaction to his pro-labor politics); and the locally significant – for its corruption, uncovered by U.S. Senator Homer Ferguson – administration of Mayor Richard W. Reading.



3301/3401 Martin Street is currently owned and used as a warehouse facility by MNP Corporation. MNP manufactures, among other products, fasteners used in the automobile industry.

**Markey House, 3504 Martin Avenue, Detroit - *Not Affected by Preferred Alternative***

This two-story brick Italianate style Side Gable house (ca. 1865) is four bays wide. The front façade exhibits a full width one-story hipped roof porch with black painted iron column supports. The elliptical brick window bay hoods on the front façade protrude from the wall. This feature does not occur on the side bays, or those associated with the two-story flat roof rear addition to the building. much of the building is vine covered or obscured by vegetation (Figure 6-3).

**Figure 6-3  
Markey and Tomms Houses  
Martin Street**



**3504 Martin Streetscape, View to South-Southwest**



**3434 Martin Streetscape, View to South-Southwest**

Source: CCRG

The dwelling at 3504 Martin Avenue was built in ca. 1865 by Michael Markey a successful Irish-born farmer who had settled in Springwells Township in 1848/1849. As of 1870 Markey's dwelling figured as a conspicuous component of his \$12,500.00 estate as valued in federal census. He, thus, was among the wealthier residents of Springwells Township. Following his death in June 1875, the residence continued to be occupied by his son, Matthew. In 1885,



Matthew was listed as a wood and coal dealer with a stand on Livernois Avenue. He continued to reside at 3504 Martin through at least 1911.

While Michael Markey's direct involvement in the local brick industry cannot be demonstrated, as of 1876, his brother John, and a probable nephew, Peter, were both identified as brick makers operating on Private Claim 60, along Martin Avenue. John's dwelling, now gone, was located on Lot 9 directly to the north of Michael's property. Peter's dwelling was on the west side of the avenue and is still extant at 4323 Martin Avenue.

Brick dwellings within the project vicinity area exceedingly rare for all periods. During the pre-1920 period, the use of common brick was largely restricted to commercial buildings along Michigan and Livernois avenues and to foundation wall or pier supports for area housing.

Nineteenth century brick houses are the single tangible reminder of the once significant part that the brick industry played in Springwells Township economics and manufacturing. The dwelling is eligible for listing on the NRHP listing under Criteria A and C. Criterion A requires that the resources be associated with events or a pattern of event significant in history. In this case, the dwelling's evidence of the earliest phases of area rural industrialization, which furnished the clay products that figured importantly in the early city growth of Detroit. The dwelling is further distinctive in its embodiment of a type, period, or method of construction (Criterion C); specifically the dwelling's distinct style expressing ca. 1865-1875 Italianate influence.

<b>Tomms House 3434 Martin Avenue, Detroit - <i>Not Affected by Preferred Alternative</i></b>
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This Italianate brick dwelling (ca. 1875) exhibits a modern wood frame two-story rear addition and an offset, enclosed front porch entry made of brick. Side bays are simple elliptical arch forms. The window bays on the front façade exhibit corbelled surrounds with stone ornamentation. Twin corbelled belt courses on the first and second floors run across the front of the building from the corners to window surrounds. All windows and doors appear to be replacements (Figure 6-3).

The dwelling at 3434 Martin Avenue dates to ca. 1875. As of 1876, these grounds to the east of Martin Avenue were in the possession of Henry and August Tomm. Listed in the 1880 census as natives of Saxony, the Tomm family resided at the 3434 Martin Avenue location for no more than a decade. They appear, however, to have been responsible for the construction of the dwelling. Listed as Henry Tomin in the 1885 city directory, he was identified as a gardener. Two years later, the property was occupied by another German-born gardener, Henry Damm.

Brick dwellings within the project vicinity are exceedingly rare for all periods. During the pre-1920 period, the use of common brick was largely restricted to commercial buildings along Michigan and Livernois avenues and to foundation wall or pier supports for area housing.

Nineteenth century brick houses are the single tangible reminder of the once significant part that the brick industry played in Springwells Township economics and manufacturing. The dwelling is eligible for listing on the NRHP listing under Criterion C. The dwelling is distinctive in its embodiment of a type, period, or method of construction (Criterion C); specifically the dwelling's distinct style expressing ca. 1865-1875 Italianate influence.

**Michigan Central Railroad Bridge Deck at the Passenger Station Complex 2405 West Vernor Highway, Detroit - *Not Affected by Preferred Alternative***

This sixteen-story Beaux-Arts building complex was erected by the Michigan Central Railroad (MCRR) in 1912/1913. Two firms designed the complex, Warren and Wetmore, and Reed and Stem. Warren and Wetmore were responsible for the station work and Reed and Stem for the construction engineering and the track work. Whitney Warren, the principal architect of the MCRR passenger station, and of the New York Central Railroad's (NYCRR) Grand Central Station, had been French-trained. After winning a silver medal for architectural design at the Paris Exposition in 1900, he was made a member, in 1905, of the Academie des Beaux-Arts. His association in passenger station design for the NYCRR and MCRR is due, in part, to his familial relationship with the Vanderbilts, who held a controlling interest in both railroads.

Originally identified as the MCRR passenger station, it was later known as the New York Central Railroad-Michigan Central District Detroit Passenger Terminal, the Penn Central Passenger Station (Detroit 1969), and the Amtrak Train Station. The building, which includes an entry pavilion and attached sixteen-story office element, was listed on the NRHP as of March 16, 1975. The complex was closed in 1987 and presently exists as a heavily damaged, vacant shell.

The NRHP nomination form omits mention of other structural elements of the complex extending below the existing CP/Expressway terminal. These include the MCRR passenger baggage and U.S. Post Office sorting rooms, an express shipping room facing Newark Street, and an extensive train shed, the last of which was demolished in 2000. The total area of this structure also includes the bridged grade separation spanning West Vernor Highway. The overriding feature linking these multiple units as a single resource is the steel girder-and-beam framing system supporting the concrete arch slab that caps the entire structure and forms the deck of the existing CP/Expressway terminal (Figure 6-4). The structure is massive, covering an area of some 234,000 square feet. See Figures 4-52 and 6-5 for its location relative to Alternative 2.

The cargo and U.S. Post Office sorting facilities are largely obscured by their below-deck setting. The overall dimensions of this element of the structure measure approximately 340 ft (north-south) by 570 ft (east-west). Its core composition consists of steel frame reinforced concrete, with floor-to-ceiling heights ranging from 12 ft. to 14 ft. The exterior along Newark Street (south) exhibits a poured concrete footing (cargo dock) surmounted by riveted steel plate columns bracketing 30 metal door (overhead) cargo bays. The upper facade consists of exposed hollow terra cotta block.

The north facade of the deck attaches to the rear (south) wing of the passenger terminal. This element of the cargo facility exhibits a Flemish bond brick veneer with the parapet exhibiting limestone block coping and a bed mold pattern cornice. A hanging metal shed roof awning extends along its entire length covering nine open window and door bays. A similar presentation also marks the wall space extending below the West Vernor Highway bridge.

The bridge element of this structure spans the 100-ft wide West Vernor Highway right-of-way and covers an area extending approximately 340 ft along the length of this street. The west end of the bridge rests atop a reinforced concrete wall abutment, with the east end forming the roof of the adjoining cargo sorting facility. The south parapet of the bridge consists of an undecorated poured concrete wall set atop a moulded cavetto device encasing the outer supporting steel girder. The north-side bridge parapet duplicates the brickwork and limestone coping and cornice patterns occurring on the adjoining baggage sorting facility. The four steel plate columns defining the north and south bridge facades are square and concrete encased, with recessed panels.



West Vernor Bridge, View to North.



Bridge-Deck Construction Detail.



Bridge Parapet (South) Detail, View to West.



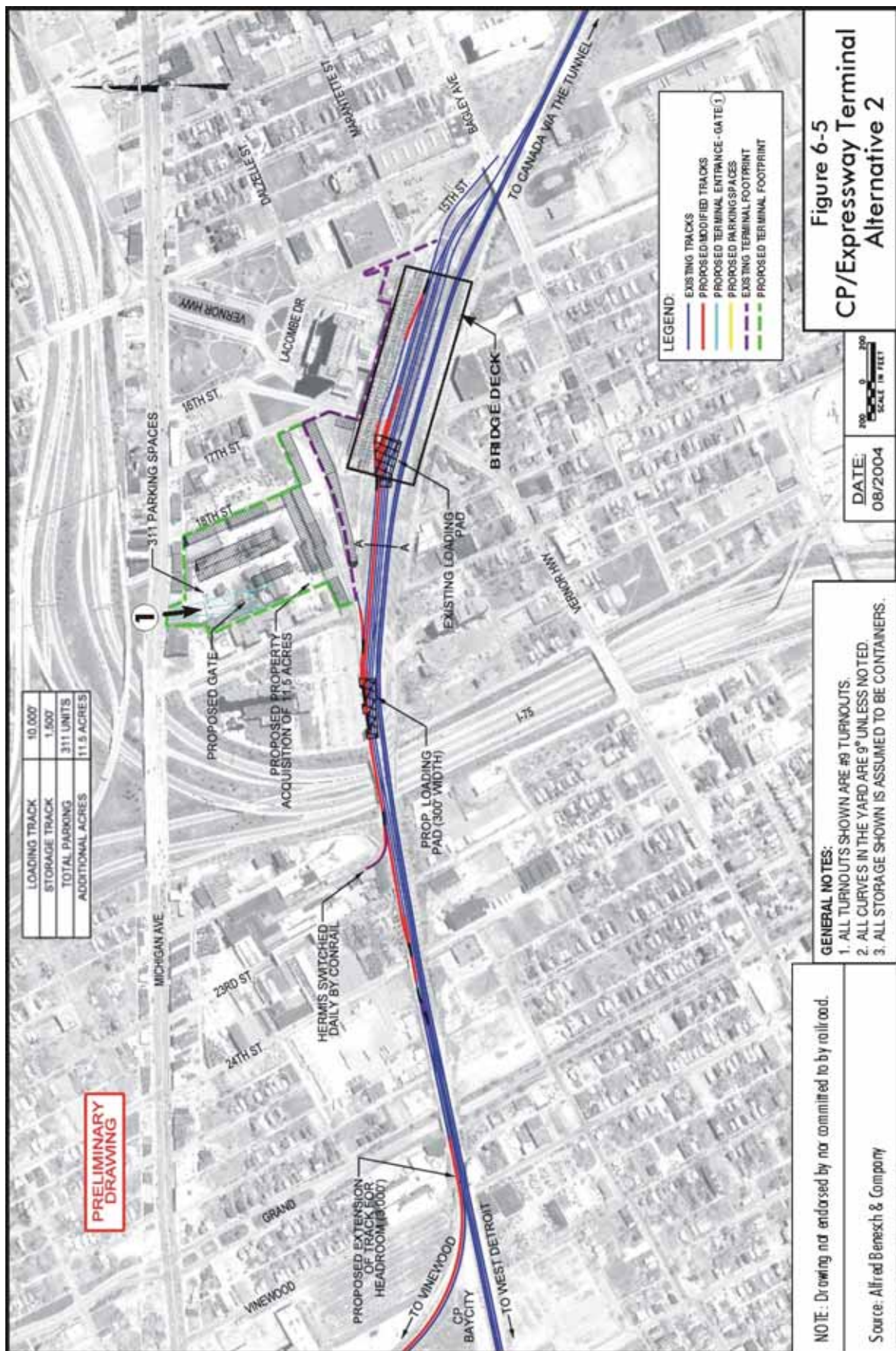
Deck Facade (South), View to East.

Figure 6-4  
Michigan Central  
Railroad Bridge Deck

SOURCE: CCRG

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Reinforced concrete building design was a product of construction technology that emerged during the late 1890s. Although plagued with numerous failures, as architects and builders pushed its capabilities over the next two decades, certain standards and design approaches became well established. Among these was the adoption of the arched reinforced concrete slab deck in both bridge and building construction, a form specifically designed to “support heavy loads.”

Although “commonly used”<sup>51</sup> as of 1910, the arched slab deck was referred to as only “sometimes”<sup>51</sup> employed as of 1917. The approach is totally omitted in standard design texts of the succeeding period. And, while the arched concrete slab deck figured as a prominent feature of bridge and building design from ca. 1905 to 1915, its use as a standard in railroad engineering remains undocumented.

The design of the MCRR railroad yard deck, encompassing an area of some 234,000 square feet, employed a complex upper- and lower-flange girder-and-beam framing system capable of supporting the thousands of tons of rail traffic that has passed over it each day for the past 90 years. It ranks as a unique example of early twentieth-century railroad engineering design.

On the basis of the foregoing, the bridge-deck structure is an integral component of the MCRR passenger station complex. Its potential for NRHP nomination, either individually or as an element of the NRHP-listed passenger station, relates directly to its unique character as a marker in the early evolution of monolithic reinforced concrete bridge/deck design specific to the ca.1905-1915 period. Its eligibility would be based on Criterion C for the structure’s significance in engineering design. The SHPO concurred that this site is eligible for the *National Register* (see letter dated October 18, 2004 in Appendix A of the DEIS).

This property is privately owned and is under lease for railroad purposes.

### 6.3.2 Recreational Resources

#### **Michigan State Fairgrounds Woodward Avenue and Eight Mile Road, Detroit - *Not Affected by Preferred Alternative***

The Michigan State Fairgrounds (MSF) property encompasses approximately 167 acres at the southeast corner of Woodward Avenue (M-1) and Eight Mile Road (M-102), both of which were developed as divided Super Highway corridors during the 1925 through 1932 period. The site, originally 135 acres, has been occupied by the MSF since 1905. Its status as a state-owned property dates to 1921, when title was transferred from the Michigan State Agricultural Society to the newly-created State of Michigan, Department of Agriculture. One of the three major goals in the Fairgrounds Mission Statement is to provide recreation opportunities along with those that are educational and entertaining (see letter dated September 9, 2003 and the Purposes and Aims Statement in Appendix A). In addition to the State Fair, the Fairgrounds is used for other events such as dog shows, horse shows, trade shows, concerts, and swap meets.

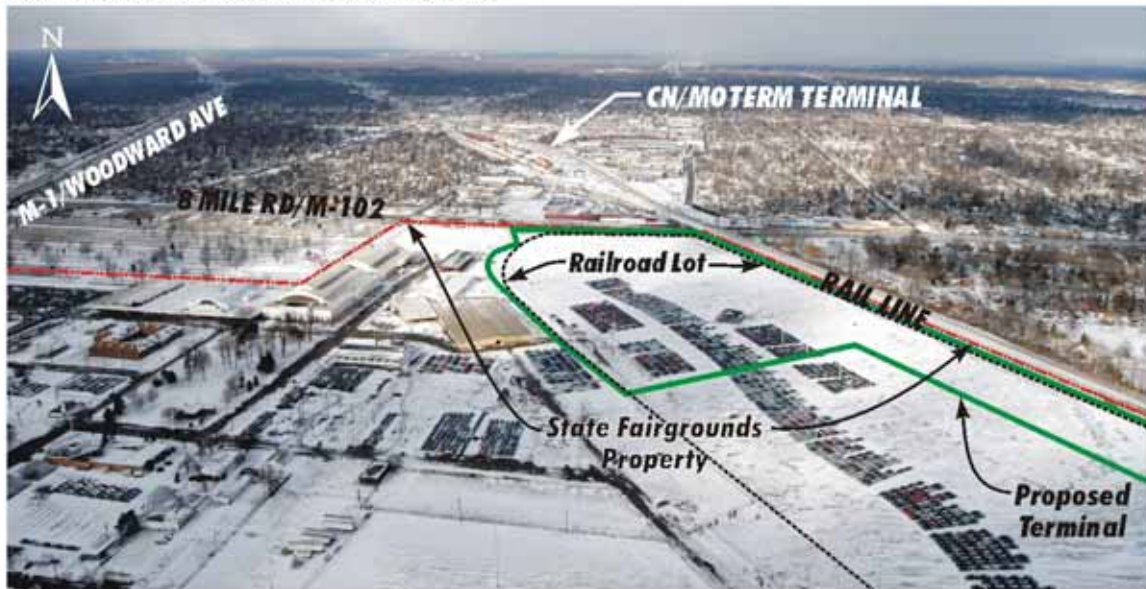
The easterly third of the Fairgrounds, adjacent to the railroad, is a fenced gravel parking and storage area designated on the current Michigan State Fairgrounds and Exhibition Center site plan as the “Railroad Lot” (Figure 6-6). This parcel adjoins the existing CN/Moterm railroad yard to the north of Eight Mile/Base Line Road (M-102). It is within the east half of this lot, adjacent to the existing railroad right-of-way, that the CN/Moterm yard has been proposed to expand

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<sup>51</sup> Radford, W.A. *Cement and How to Use It*, The Radford Architectural Company, Chicago, 1910.



Aerial view of Auto Storage at the State Fairgrounds



Ground view of Auto Storage at the State Fairgrounds



Figure 6-6  
Michigan State Fairgrounds

SOURCE: The Carradino Group of Michigan, Inc.  
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approximately 35 acres as an alternative to the facility's expansion in the City of Ferndale. See Figures 4-10d and 4-53 for its location relative to Alternatives 2 and 4. This area is used for parking during the Michigan State Fair which is a period of up to 14 days in August of each year.

The Michigan State Fair is said to be the oldest in the country and is an essential component of the state and regional recreational fabric. However, the land proposed for intermodal rail use is not a part of the State Fair activity except for parking. The property along the railroad in recent years has been used for container storage by the Canadian National (CN) Railroad. In conjunction with a consent agreement between the City of Ferndale and CN in the early 1990s, trucks at the CN intermodal terminal on the north side of Eight Mile Road began using a bridge within railroad right-of-way over Eight Mile Road. The purpose of the bridge is to provide an alternative means of entry and exit to the intermodal yard without having to use Fair and Chesterfield Streets (which are in Ferndale). They are the local streets north of Eight Mile Road that provide access to the intermodal terminal today. CN leased the additional land to expand their operations south of Eight Mile Road. When CN lost a major customer, it discontinued use of the bridge and resumed use of Fair and Chesterfield Streets.

There is a history of railroad use of the Fairgrounds under lease agreement, and the bridge remains in place on railroad property to resume such use. Today, land on the east side of the Fairgrounds is used through a lease agreement to store new automotive vehicles before they are shipped to their final destination. The area is not accessible to the public. Entry to the entire Fairgrounds site is accomplished by passing through a single entry accompanied by a guard on duty 24 hours a day. Prior to this area being used for automobile storage, it was used as a private racetrack, part of CN/Moterm's intermodal facility, and as a private softball complex. Since its use as a private softball complex, the area has been covered with gravel. There have been a variety of suggestions for use of the land over time, including a racetrack and a regional metro park.

## 6.4 Impacts on the Section 4(f) Properties

The properties used by the project alternatives are summarized in Table 6-1. ***The Preferred Alternative use of Section 4(f) property is limited to the Michigan Box Company/Spranger Wire Wheel Corporation.***

Alternative 2, Improve/Expand the CP/Expressway terminal would have added and modified tracks on the Bridge Deck at the Michigan Central Railroad passenger station complex at the CP/Expressway intermodal terminal. The addition and modification of tracks at this site was considered an adverse effect to a historic resource as defined by Section 106 and would result in a use of a protected resource. The SHPO concurred this would be an adverse effect (see letter dated October 18, 2004 in Appendix A of the DEIS).

Alternative 3: Consolidating all intermodal activity at the Livernois-Junction Yard and Alternative 4: the Composite Alternative of consolidating intermodal activity of three railroads at the Livernois-Junction Yard and expanding the CN/Moterm terminal would have required the total removal of the Michigan Box Company/Spranger Wire Wheel Corporation site for the expansion of the Livernois-Junction Yard. The total removal of buildings at this site is considered an adverse effect to a historic resource as defined by Section 106 and would result in the use of a protected resource. The SHPO concurred this would be an adverse effect (see letter dated October 18, 2004 in Appendix A of the DEIS).

Alternative 3: Consolidating all intermodal activity at the Livernois-Junction Yard would have required the total removal of the Federal Screw Works Factory for the expansion of the

Livernois-Junction Yard. The total removal of this factory is considered an adverse effect on the following three historic properties as defined by Section 106, and would result in the use of protected resources: the Federal Screw Works Factory, the Markey House (adverse visual effect), and the Tomms House (adverse visual effect). The SHPO states this would be an adverse effect (see letter dated January 21, 2005 in Appendix A).

Alternatives 2, 3 and 4: The house at 6332 John Kronk currently faces the existing rail yard. There will be no expansion of the rail yard in its vicinity under any of the alternatives. A wall would be built that would block the current view of rail activity. The active mainline tracks through the yard are in the immediate foreground. Train volumes on these tracks will substantially increase from about 30 to 60 under No Action conditions. Intermodal expansion could add up to another 12 train passbys. The SHPO has further concluded that the wall alongside the railroad yard across the street from 6332 John Kronk Street “has the potential to result in an Adverse Effect on the house through its height, design, and placement. Therefore, any alternative that includes the construction of such a wall must include the condition that the plans for the barrier wall and any landscaping are subject to review and approval by the SHPO.” (Letter dated June 20, 2005 in Appendix A.) The potential adverse effect to a historic resource as defined by Section 106 would result in the use of a protected resource.

Alternative 2 and Alternative 4 would have required approximately 35 acres of Michigan State Fairgrounds (MSF) property. The taking of this area at this site is considered a use of a protected resource (recreational property).

#### ***Preferred Alternative – Impacts to Section 4(f) Properties***

*The Preferred Alternative will require the total clearing of the Michigan Box Company/Spranger Wire Wheel Corporation site for the expansion of the Livernois-Junction Yard. The Preferred Alternative needs long straight sections of rail yard for efficient intermodal operations. This can only occur by closing Lonyo, lowering Central Avenue under the rail yard, and acquiring sufficient land parallel to the existing yard to add terminal width. The Michigan/General Box Company (Spranger/Detroit Wire Wheel Corporation) lies within the land needed. The terminal cannot prudently be reconfigured to avoid this use to operate efficiently. The total removal of buildings at this site is considered an adverse effect as defined by Section 106 and would result in the use of a protected resource. The SHPO concurred this would be an adverse effect (see letter dated October 18, 2004 in Appendix A of the DEIS).*

*CN elected not to participate in government-funded improvements at its Moterm Terminal, so the Preferred Alternative has no effects on the Michigan State Fairgrounds property (recreational property).*

## **6.5 Avoidance Alternatives**

Build alternatives were considered, as well as the No Action Alternative. These included improving/expanding four existing intermodal terminals, consolidating the intermodal activity of four Class I railroads at the Livernois-Junction Yard, and a composite alternative of consolidating the intermodal activity of three of the major railroads at the Livernois-Junction Yard while improving/expanding the CN/Moterm terminal. Build alternatives that were found not to be feasible and prudent/practical included expanding smaller terminals and developing terminals at greenfield sites. These were found not to be prudent alternatives as they would not meet the project’s purpose and need and they were eliminated from further study. The No Action Alternative does not meet the project’s purpose and need. The development of alternatives and their evaluation are discussed in Section 3. *The Preferred Alternative is a modification of*

*Alternative 4 that recognizes the termination of CP's Expressway operation and the fact that CN will not participate in terminal improvements, so there will no changes through government action at the Moterm Terminal.*

### **6.5.1 Historic Properties**

The build alternatives were designed to avoid effects on Section 4(f) properties. Potential historic resources were identified early in the analysis process; those that were deemed to have potential for the *National Register* were avoided, where prudent and feasible. These properties acted as design layout “controls.” Avoidance and then minimization guided the development of the alternatives.

All feasible and practical alternatives underwent detailed study in the DEIS. Alternatives which clearly did not address the project purpose and need, described below, were eliminated from future consideration.

### **Other Sites for Intermodal Terminals**

Since the 1980s, railroads have consolidated their intermodal service networks into fewer, larger hub terminals as they saw an opportunity to consolidate enough volume in one location to justify lift machines and other expensive equipment/facilities. Small facilities have been eliminated. For example, the activity at the smaller Norfolk Southern intermodal terminal at Oakwood has been shifted/consolidated at the Livernois-Junction Yard. This location, and others in the region like at Highland Park, do not lend themselves to productive intermodal operations. Nevertheless, an existing terminal like Melvindale, and even Willow Run, may be used for some time into the future, if adequate capacity is not available on a timely basis at the Livernois-Junction Yard. But, even if these Class I railroad terminals stay in use indefinitely, their capacity, when added to that of the four intermodal terminals most likely to continue, does not address the demand expected in the future.

The August, 1994 Mercer Report<sup>52</sup> identified the CN/Highland Park terminal as one of two alternatives that warranted further investigation for a consolidated terminal (the Livernois-Junction Yard was the other alternative identified at that time). The Mercer Report and subsequent research has found the Highland Park site is not a viable intermodal terminal option for CN because:

1. The Highland Park property is cut up by major transportation facilities, so that standards for a modern intermodal terminal cannot be met.
2. Storage and support tracks would have to be located offsite causing additional switching inefficiencies for the rail operators and the possible need for additional property acquisition.

It is not a viable option for CSX, NS and CP because:

1. Extensive trackage rights would be required for any of these railroads to use the site.
2. The cost and time for these carriers to access the site make it an unacceptable option.

It has also been suggested the Port of Detroit is an alternative to the consolidation at Livernois-Junction Yard. The Port of Detroit, consisting of approximately 36 privately owned marine terminals, continues to be a successful and active commercial port that typically handles 15-20 million tons of cargo annually. The vast majority of this cargo consists of bulk materials, including

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<sup>52</sup> Greater Detroit Area Intermodal Study, Phase II – Intermodal Transportation Center Concept, Mercer Management Consulting, August 1994.

iron ore, stone, coal, cement, and petroleum. A portion of these bulk cargoes is transferred between ships and trucks for local or regional distribution. Another portion of these cargoes are processed or transformed at the port (e.g., steel mills, electric generating plants, asphalt plants, etc.). A fairly small portion of Detroit's waterborne commerce consists of general (non-bulk) cargo, including steel products and, occasionally, machinery. These cargoes are also transferred between ships and trucks (occasionally rail) for local or regional distribution/collection.

There are no regular movements of containers via marine transportation at the Port of Detroit or other Great Lakes ports. For overseas container movements, the economic efficiencies of the overland transportation system (rail and truck) serving coastal ports, combined with the physical constraints of the Great Lakes/St. Lawrence Seaway System (lock size, channel depth, seasonality), make direct movement of containers through Great Lakes ports uncompetitive and highly unlikely. Southeast Michigan's overseas container traffic utilizes the efficient rail connections to coastal ports, including Montreal, Halifax, New York/New Jersey, Baltimore, Hampton Roads, Los Angeles/Long Beach, Oakland, Seattle/Tacoma, and Vancouver. This is largely affected by the lack of reliability for time-sensitive cargo to move inland via the St. Lawrence Seaway as weather makes its use practically impossible for months each year.

Finally, it is not a viable option for consolidation because extensive trackage rights would be required for CP and CN to use the port.

### **Greenfield Site**

The proposed concept of intermodal freight consolidation focuses on the Livernois-Junction Yard area. It lies at a railroad point called West Detroit, which is reached by each of the four Class I railroads serving the Greater Detroit Area. Canadian National (CN) and Norfolk Southern (NS) reach West Detroit over their own lines while Canadian Pacific (CP) and CSX reach the Livernois-Junction Yard either with trackage rights (CP) or ownership of Conrail (CSX). There is no other location in the Greater Detroit Area or the state of Michigan where this occurs.

Each of the railroads reaches Detroit over a network of individually-owned rail lines. There are locations along those lines where tracts of land that are largely undeveloped and otherwise known as "greenfields," might appear to be available for the development. But only one railroad would be able to reach any such new intermodal terminal location.

Another issue with those undeveloped properties is they tend to be removed from the shippers that they will be serving. This results in increased distance/time to haul goods (drayage) and contributes to highway congestion creating a less efficient intermodal transportation system, which is counter to the purpose of this project. "Greenfield" developments may also contribute to urban sprawl and require new highway, utility and other infrastructure. Conversely, for the most part, the existing intermodal facilities, and the proposed consolidated terminal at the Livernois-Junction Yard, are able to use the established infrastructure that is already in place.

The earlier studies in 1993/1994 conducted for MDOT by Mercer Consulting examined possible "greenfield" sites. One, Willow Run, while having several attributes, was served by only a single railroad at the time, Conrail. Since the sale of the Conrail assets, Norfolk Southern now controls access to the location. Additionally, Willow Run has been proposed for high-speed passenger service. The earlier MDOT studies found that the Willow Run site was far from its market with high pickup and delivery costs. Nevertheless, because of the Triple Crown business growth, NS has had to re-open the Willow Run terminal or lose the business. It has, at the same time, asked MDOT for financial assistance so that it can consolidate all its intermodal operations on an accelerated pace at the Livernois-Junction Yard. None can be provided unless and until the DIFT environmental review is complete.

Overall, a “greenfield” site does not meet the purpose of the project because it results in increased distance/time to haul goods (drayage) and contributes to highway congestion creating a less efficient intermodal transportation system.

### **CBRA Alternative**

An alternative proposed by a group known as Communities for a Better Rail Alternative (CBRA) focuses only on the Livernois-Junction Yard. It involves several elements including building a new interchange at I-94/Rotunda Drive to connect with the rail line plus a second interchange connecting the rail line with I-75 north of the Ambassador Bridge. These interchange concepts are not possible according to American Association of State Highway and Transportation Officials (AASHTO) design standards because of constraints on spacing of interchanges, and elevations/grades. In addition, the CBRA alternative would not meet the forecasted future demand for lift capacity. There would be no increase in the terminals’ size for increased lift capacity resulting in a lift deficiency ranging from 155,000 to 431,000 lifts per year.

### **6.5.2 Recreational Properties**

Several alternatives, described below, were studied to expand the CN/Moterm terminal without using any of the Michigan State Fairgrounds. None of these were found to be feasible and prudent. ***But, under the Preferred Alternative, CN elected not to participate in government-funded improvements at its Moterm Terminal, so the Preferred Alternative has no effects on any recreational property.***

#### **Moterm Expansion to the East into Ferndale**

Expansion to the east of the existing CN/Moterm terminal into the industrial area of Ferndale would have involved the acquisition of 10 businesses. These businesses provide a major portion of the tax base for the City of Ferndale (population fewer than 25,000 people). Because of the limited amount of industrial redevelopment property in the city, these businesses would have been lost to other areas. Additionally, Gage Products Company would have been displaced. This company is a permitted storer of up to one million gallons of hazardous materials. It is Ferndale’s largest taxpayer. It would not have been possible to relocate this business in Ferndale because of its handling of hazardous materials.

Due to the large number of business relocations that would have been required and the major reduction in tax revenues for Ferndale, expansion to the east was not a feasible and prudent alternative.

#### **Moterm Expansion to the West into Ferndale**

Expansion to the west of the existing CN/Moterm terminal would have required relocation of approximately seven businesses, 60 single-family residences, and a large above-ground storage tank. This included construction of a perimeter road along the outside of the railroad fence that would have provided north-south connectivity within the remaining neighborhood. It accounted for placement of a wall for terminal security and noise reduction purposes. Any additional buffering would have required acquisition of more residences and possibly businesses. It is presumed the gate would have remained in its present location. Presently Fair Park provides some buffering to the community. This park would have been acquired by an expansion to the west; a 4(f) impact.

Due to the large number of relocations that would be required and the taking of Fair Park, expansion to the west was not a feasible and prudent alternative.

### **Moterm Expansion to the South and East into Detroit**

Expansion into the Detroit neighborhood south of Eight Mile Road and east of the railroad tracks would have involved acquisition of seven businesses and 90 single-family homes. Locating the gate east of the railroad tracks must be at a sufficient distance from the railroad overpass on Eight Mile Road to allow for safe movements. This adds to the footprint of the site. Additionally, such an expansion would have required the total acquisition of Hunt Playground (about 6 acres in size); a 4(f) impact.

Due to the large number of relocations that would be required and the acquisition of Hunt Playground, expansion into the Detroit neighborhood east of the railroad tracks and south of Eight Mile Road was not a feasible and prudent alternative.

#### ***Preferred Alternative – Historic and Recreational Resources***

***Avoidance of Section 4(f) resources was managed in the Preferred Alternative with the exception of the Michigan Box Company/Spranger Wire Wheel Corporation site.***

#### ***6.5.3 Statement of No Prudent and Feasible Alternatives***

***Based on the avoidance alternatives analyzed above for the Michigan Box Company/Spranger Wire Wheel Corporation, there are no prudent and feasible alternatives to the use of Section 4(f) land. There are unique problems and unusual factors involved in the use of alternatives that avoid these properties. The cost, social, economic, and environmental impacts, and community disruption resulting from such alternatives reaches extraordinary magnitudes.***

## **6.6 Measures to Minimize Harm**

A number of measures to minimize harm apply to all sites. Prior to construction, MDOT will establish a permanent record of the history and current conditions of sites determined to be eligible for the *National Register of Historic Places* in conjunction with the SHPO. This consultation will also guide the appropriate level of detail of the documentation. MDOT will provide original copies of the documentation with photos to the SHPO and appropriate local archives designated by the SHPO. MDOT will also work with the SHPO to develop context sensitive design measures near historic sites (see signed Memorandum of Agreement [MOA] in Appendix C).

### **6.6.1 Michigan/General Box Company (Spranger/Detroit Wire Wheel Corporation)**

At the outset of the project the concept for intermodal consolidation in the area of the Livernois-Junction Yard called for acquisition of 700 to 800 acres north of John Kronk. Analysis reduced this to 384 acres for Alternative 3, which would consolidate all four major railroads at the Livernois-Junction Yard. Alternative 4, the Composite Alternative, where three railroads are consolidated at the Livernois-Junction Yard and the CN/Moterm terminal is improved/expanded was created to further reduce impacts in the Livernois-Junction area compared to Alternative 3. Alternative 4 required approximately 120 fewer acres at the Livernois-Junction Yard than Alternative 3. But, even with this minimized alternative, the Michigan/General Box Company (Spranger/Detroit Wire Wheel Corporation) was required to meet the future intermodal capacity need.



*This National Register eligible resource (see Section 6.3) is affected by the Preferred Alternative. Harm will be mitigated by establishing a permanent record of the history and current conditions of this site in accordance with the MOA in Appendix C. As a modification of Alternative 4, the Preferred Alternative has the same land needs on the north side of the Livernois-Junction Yard that include removing this resource.*

#### **6.6.2 6332 John Kronk**

The house at 6332 John Kronk currently faces the existing rail yard. A wall *along the edge of the Livernois-Junction Yard* will be built that would block the current view of rail activity under all build alternatives. The active mainline tracks through the yard are those nearest to Kronk. Train volumes on these tracks will substantially increase from about 30 to 60 under No Action conditions. Intermodal expansion could add up to another 12 train passbys. The wall is required for security purposes and to buffer the adjacent community, including 6332 Kronk, from the increasing rail activity.

*This resource is not used by the Preferred Alternative. Coordination with the SHPO in the design of the wall and accompanying landscaping will minimize harm to this resource.*

#### **6.6.3 Federal Screw Works Factory**

At the outset of the project the concept for intermodal consolidation in the area of the Livernois-Junction Yard called for acquisition of 700 to 800 acres north of John Kronk. Analysis reduced this to 384 acres for Alternative 3, which would consolidate all four major railroads at the Livernois-Junction Yard. But, even with this minimized acquisition area, the Federal Screw Works Factory would have been required to meet the future intermodal needs of Alternative 3.

*This resource is not used by the Preferred Alternative.*

#### **6.6.4 Markey House**

At the outset of the project the concept for intermodal consolidation in the area of the Livernois-Junction Yard called for acquisition of 700 to 800 acres north of John Kronk. Analysis reduced this to 384 acres for Alternative 3, which would consolidate all four major railroads at the Livernois-Junction Yard. With this minimized acquisition area, the Markey House is not required. However, the demolition of the Federal Screw Works Factory across the street *under Alternative 3* would have resulted in an adverse visual effect to a historic resource as defined by Section 106 and would result in a use of a protected resource.

*This resource is not used by the Preferred Alternative because the Federal Screw Works Factory will not be removed by the Preferred Alternative.*

#### **6.6.5 Tomms House**

At the outset of the project the concept for intermodal consolidation in the area of the Livernois-Junction Yard called for acquisition of 700 to 800 acres north of John Kronk. Analysis reduced this to 384 acres for Alternative 3, which would consolidate all four major railroads at the Livernois-Junction Yard. With this minimized acquisition area, the Tomms House is not required. However, the demolition of the Federal Screw Works Factory across the street *under Alternative 3* would have resulted in an adverse visual effect to a historic resource as defined by Section 106 and would result in a use of a protected resource.

***This resource is not used by the Preferred Alternative because the Federal Screw Works Factory will not be removed by the Preferred Alternative.***

#### **6.6.6 Michigan Central Railroad Bridge Deck**

Alternative 2 Improve/Expand the existing terminal at CP/Expressway would have used/adversely affected the Michigan Central Railroad Bridge Deck because railroad tracks would have been added on it. Minimizing the acquisition area required for an improved/expanded terminal would still require alteration of the bridge deck ***under Alternative 2 only.***

***This resource is not used by the Preferred Alternative.***

#### **6.6.7 Michigan State Fairgrounds**

Alternative 2 Improve/Expand the existing terminals and Alternative 4, the Composite Alternative, where three railroads were to be consolidated at the Livernois-Junction Yard and the CN/Moterm terminal was to be improved/expanded at the Michigan State Fairgrounds would both have required land from the State Fairgrounds. Because no alternatives to expanding the CN/Moterm terminal without using the Fairgrounds were feasible and practical, efforts were made to minimize the impact on the Fairgrounds property. This area is labeled as “Railroad Lot” on Fairgrounds’ maps. No active public or private recreation areas would have been taken. The land that would be used at the Fairgrounds property is currently leased for the parking of new automotive vehicles prior to shipment. Prior to this use, the area in question was used as a private racetrack, part of CN/Moterm’s intermodal facility, and as a private softball complex.

In an effort to minimize impacts, the area for expansion of the CN/Moterm terminal was reduced to approximately 35 acres from 50 acres. Coordination occurred with the Fairgrounds management on where to place the terminal expansion, how to design the terminal, and how to mitigate impacts sensitive to the Fairground’s needs, including replacement parking needed during the annual State Fair.

***This resource is not used by the Preferred Alternative. The need for land at the Fairgrounds ended when CN elected not to participate in terminal expansion under the DIFT Project.***

### **6.7 Coordination**

Effects of the proposed action, the alternatives considered, and the proposed measures to minimize harm have been reviewed by and developed in consultation with the SHPO, and discussed with property owners (all of whom have been contacted in the course of the analysis) and the official having jurisdiction over the State Fairgrounds. FHWA will provide information to the Advisory Council on Historic Preservation for their review and comment. MDOT has conducted extensive owner interviews to complete the historic property inventory and held the following meetings, to which the public was invited:

- July 11, 2002 – LASED Youth Center. (Total attendance 50.) Purpose: To introduce the Environmental Impact Statement process.
- August 15, 2002 – DIFT Information Office, 2722 Livernois Avenue. (Total attendance 20). Purpose: To discuss how to improve the appearance of the west side of Livernois Avenue at the yard entrance.

- February 24, 25, 26, and 27, 2003 – The Community House, Edison Oakland Public School Academy, MDOT Detroit Transportation Service Center, and LASED Youth Center. (Total attendance 110.) Purpose: To discuss Illustrative Alternatives.
- September 15, 16, 17, and 18, 2003 – The Holiday Inn in Grandmont, Edison Oakland Public School Academy, Michigan Conference of Teamsters Welfare Fund, and Dearborn P.D. Training Room. (Total attendance 310.) Purpose: To discuss Practical Alternatives.
- March 29, 30, 31, and April 1, 2004 - The Michigan State Fairgrounds, The Holiday Inn in Grandmont, IBEW Local 22, and LASED Youth Center. (Total attendance 400.) Purpose: To discuss Practical Alternatives.

Two scoping meetings were conducted – September 19, 2002 and June 4, 2003. The first scoping meeting included a bus tour of the area around the Livernois-Junction Yard/CP Expressway terminal. The second scoping meeting was held after the number of action alternatives increased from two to three to include the Improve/Expand Alternative. Each scoping meeting included a public comment period.

In addition to the public meetings, the DIFT Local Advisory Council was formed of community representatives. It met 30 times between June 2002 and October 2004, inclusive. Each meeting was open to the public and provided for public comment. A tour was conducted for the public of the areas around intermodal terminals in Southwest Detroit and Melvindale as part of the July 11, 2002 public meeting. Another tour was conducted of Chicago intermodal terminals on July 16, 2002. Local Advisory Council members were invited to participate in March 2003 of a tour of Detroit area intermodal terminals.

The public engagement process also involved many small group/one-on-one meetings requested by the public or set up by MDOT.

Historic resources were not raised as a concern by the public at these meetings. Several people who attended the March 29, 2004 meeting at the Michigan State Fairgrounds commented that they would like to see the current leased parking/unused areas at the Fairgrounds converted into a metro park.

Coordination was ongoing with the General Manager of the Michigan State Fairgrounds. Meetings with the General Manager occurred on at least a half-dozen occasions from the fall of 2003 until August 2004 (refer to Page A-11 of the DEIS).

Public hearings were held after publication and distribution of the Draft EIS/Draft Section 4(f) Evaluation.

- June 13, 14, 15 and 16, 2005 - LASED Youth Center, IBEW Local 22, the Holiday Inn in Grandmont, and the Michigan State Fairgrounds. (Total attendance 290.)

The public hearings provided an overview of the study and allowed participants the opportunity to comment either on a comment form or to a court reporter. The DEIS was distributed to the appropriate federal, state, and local agencies, and was made available for public review and comment for 60 days after the public hearing. Historic resources were not raised as a concern by the public at these hearings.

## **6.8 Section 4(f) Conclusion**

Based on the above considerations, there is no feasible and prudent alternative to the use of the Michigan/General Box Company (Spranger/Detroit Wire Wheel Corporation) at 7175 Clayton Street, Detroit. The proposed action includes all possible planning to minimize harm resulting from such use. An updated Memorandum of Agreement outlining mitigation for these properties is included in Appendix C.

## SECTION 7

# AGENCY COORDINATION AND PUBLIC MEETINGS

This section provides an overview of the public and agency input that was vital to the development of the alternatives, the analysis of impacts, the selection of the Preferred Alternative and the measures to minimize harm that have been developed to mitigate project impacts. This section includes: early coordination; the public meetings conducted during the course of the project that led to the public hearing, including the results of interviews with individuals and groups with project interests in each terminal area; environmental justice and Title VI; *coordination with Native American groups*; comments received from the public at the public hearing and during the comment period and the responses to them; *and*, the comments of agencies and other entities and responses to them.

### 7.1 Agency Coordination

Scoping meetings were held September 19, 2002 and June 4, 2003 in Detroit for agencies and local entities. Prior to the meeting a scoping packet was mailed to those invited. A listing of those invited, those who attended and those who responded to scoping materials was in Appendix A of the DEIS.

### 7.2 Public Meetings

Engagement of the public in preparing the Draft Environmental Impact Statement involved a series of meetings. Each included mailings to between 5,000 and 25,000 residences and businesses – the mailings increased as the alternatives expanded in number to include terminal sites at CP/Expressway, CP/Oak and CN/Moterm as well as the Livernois-Junction Yard. From the outset, the mailings, as well as all printed literature available at public meetings, were provided in English, Spanish and Arabic. Spanish and Arabic translators were available at each public meeting. The meeting format used was both Public Forum and a combination of Public Forum and Town Hall meeting. The public meetings are as follows:

- July 11, 2002 – LASED Youth Center. (Total attendance 50.) Purpose: To introduce the Environmental Impact Statement process.
- August 15, 2002 – DIFT Information Office, 2722 Livernois Avenue. (Total attendance 20). Purpose: To discuss how to improve the appearance of the west side of Livernois Avenue at the yard entrance. Open May 2002 to May 2003.
- February 24, 25, 26, and 27, 2003 – The Community House, Edison Oakland Public School Academy, MDOT Detroit Transportation Service Center, and LASED Youth Center. (Total attendance 110.) Purpose: To discuss Illustrative Alternatives.
- September 15, 16, 17, and 18, 2003 – The Holiday Inn in Grandmont, Edison Oakland Public School Academy, Michigan Conference of Teamsters Welfare Fund, and Dearborn P.D. Training Room. (Total attendance 310.) Purpose: To discuss Practical Alternatives.
- March 29, 30, 31, and April 1, 2004 - the Michigan State Fairgrounds, the Holiday Inn in Grandmont, IBEW Local 22, and LASED Youth Center. (Total attendance 400.) Purpose: To discuss Practical Alternatives.

Two scoping meetings were conducted – September 19, 2002 and June 4, 2003. The first scoping meeting included a bus tour of the area around the Livernois-Junction Yard/CP Expressway terminal. The second scoping meeting was held after the number of alternatives increased to

include the improving/expanding existing intermodal terminals in addition to the No Action and Consolidate options. Each scoping meeting included a public comment period.

In addition to this series of public meetings, the DIFT Local Advisory Council was formed of community representatives. It met 30 times from June 2002 to and including October 2004. Each meeting was opened to the public and included a public comment period. Local Advisory Council members, and others, participated in the August 2002 tour of intermodal facilities in Chicago (59<sup>th</sup> Street, Corwith and Willow Springs terminals); as well as the March, 2003 tour of Detroit area intermodal terminals. The public at large was provided the means to tour the areas around intermodal terminals in Southwest Detroit and Melvindale as part of the July 11, 2002 public meeting. Another tour was conducted of Chicago's intermodal terminals on July 16, 2002.

The public engagement process involved many small group/one-on-one meetings requested by the public or set up by MDOT. It also provided a Web site and 800 number to access information at any time.

### **7.2.1 Interview Process**

One component of the community inventory effort was an outreach/interview process that contacted the various populations involved in this analysis to define issues/services/facilities serving these groups. More than half of the 110+ individuals/groups contacted participated in the interviews. The following summarizes the results of those discussions.

Overall, the strongest characteristics of the terminal area communities are their resiliency, ethnic diversity, local shopping districts, and residential neighborhoods. However, each community is not without its share of challenges. The infrastructure is also in need of repair, and new strategies are needed to retrofit land uses, while preventing deterioration of neighborhoods. The housing stock dates back to the early 1900s. The areas' lack of suitable housing has sparked a revitalization of older housing.

The residents of each terminal area are neighbors with industry and heavy freight traffic. The history of each community has always involved industry. This industrial history has left a legacy of the mixture of incompatible land uses. Many buildings that once provided economic security to area residents are now vacant. As a result, many of the owner-occupants of residential units are not resistive of a move, as determined by interviews.

Two of the three terminal areas have experienced continued decline as has the City of Detroit itself. Recent data indicate the City of Detroit has lost an additional 40,000 people between 2000 and 2003 putting its current population at 911,000, the number of people in Detroit around the time of World War I. Nevertheless, southwest Detroit and the Livernois-Junction Yard terminal area have experienced a resurgence. This has resulted in many new locally-owned businesses. They range from family-owned bakeries to large-scale manufacturing operations. Evidenced by the amount of renovated storefront businesses, homes, and "new" commercial development along the main thoroughfare of W. Vernor Highway, it is clear that the community is revitalized. Community cohesion is a concern here and in the two other terminal areas.

### **Livernois-Junction/CP Expressway Terminal Area**

Over two dozen groups/individuals in the Livernois-Junction/CP Expressway terminal area were interviewed (Table 7-1). The most-frequently cited community facilities are schools and places of worship. Important organizations mentioned include the Arab Community Center for Economic and Social Services (ACCESS), Community Health and Social Services (CHASS), Detroit Hispanic Development Corporation (DHDC), LA SED, Latino Family Services, and



Mexicantown Community Development Corporation. Social groups mentioned are the Puerto Rican Club, the Yemen Social Club and Kemeny Recreation Center.

Issues of interest include the need for education (including English as a second language), jobs and job training, and personal security. A number of groups cited health care, housing and sustaining the area's revitalization (both housing and commercial development, including small business development) as key concerns. The continued importance of W. Vernor Avenue as a neighborhood commercial corridor was mentioned as a matter of importance. And, replicating that success on Michigan Avenue was cited.

Projects in the area that are emerging include the Riverfront Revitalization and Reuse of Tiger Stadium, the Mercado/Welcome Center at the Ambassador Bridge Gateway, the housing revitalization near Roberts Avenue in East Dearborn, and many smaller housing and commercial projects.

Traffic, especially heavy-duty truck traffic in the area, was often mentioned as a concern. So are the related environmental issues, particularly pollution and its relationship to asthma. The latter is of concern because many people in the terminal area have little or no means to pay for health care/medications.

#### **CP/Oak Terminal Area**

Four groups/individuals were interviewed to discuss community facilities and services in the CP/Oak terminal area (Table 7-2). Here, too, places of worship were cited as key institutions/facilities. Others noted include the North Rosedale Community House and O'Shea Recreation Center. Key service programs are Head Start as well as the Police Athletic League.

Issues of significance include stabilizing housing in the area, addressing crime and trash. Traffic was also cited as an issue. The rail yard and related activities were not singled-out as a particular concern. It was noted the railroads have the potential of being a good neighbor in the community.

#### **CN/Moterm Terminal Area**

Eight groups/individuals were interviewed in the CN/Moterm terminal area (Table 7-3). Again, the places of worship and schools (including the seven schools in Ferndale) were frequently cited as important community facilities. Additional facilities of community importance are the Kulick and Tindal Centers in Ferndale, the State Fairgrounds, and housing centers (like the Hilton Apartments) that serve the elderly and those of lower income. Frequently mentioned in the interviews was the Chaldean community in terms of its facilities and services as well as the energy offered in revitalizing the housing and business activity in the area around Seven and Eight Mile Roads, Woodward and John R.

Issues of importance in this terminal area are sustaining the development, along Woodward Avenue in both Ferndale and Detroit and revitalizing Eight Mile Road. Concerns about railroad terminal operations, including possible expansion of the CN/Moterm rail yard, include: the blocking by trains of traffic movements including school buses and emergency equipment; noise; air pollution; increased truck traffic; depreciation of housing values; and, the threat to desired developments at the State Fairgrounds (i.e., a Huron Metro Park) and at the southeast corner of the intersection of Woodward Avenue and Eight Mile Road. The potential of the expanded intermodal terminal thwarting those desired projects was stressed as a concern.

## **Other Organizations**

A dozen groups/individuals not specifically focused on a terminal area were also interviewed to provide an overview of social/cultural issues of key populations in general (Table 7-4). When addressing the German, Irish and Polish communities, the clear indication is the decline of concentration of these ethnic groups and the services/facilities/organizations, including places of worship, to support them. A review of Table 4-12 echoes that trend as all non-minority ethnic groups, except the Arab community, declined in the Detroit Urbanized Area in the 1990s. Most significant among these are the Irish, German and Polish. This trend is repeated, but with less significant declines, in each terminal area.

Views by non-terminal area-based groups that are focused on African American issues, indicate concern about jobs, job training, crime, and health care/substance abuse. Those non-terminal groups that are focused on Hispanic issues also view employment, education, crime and health care as key concerns.

### **7.3 Coordination with Native American Groups**

Scoping meetings were held September 19, 2002 and June 4, 2003 in Detroit for agencies and local entities. The Saginaw Chippewa Indian Tribe was invited to both meetings by U.S. mail. Prior to the meetings a scoping packet was mailed to those invited. A listing of those invited, those who attended and those who responded to scoping materials was in Appendix A of the DEIS. The Ziibiwing Cultural Society, The Saginaw Chippewa Indian Tribe responded to the invitation and scoping materials September 9, 2002 by letter, stating “at this time we do not have any information concerning the presence of any Indian Traditional Cultural Properties, Sacred Sites, or other Significant Properties to the projected project area(s). This is not to say that such a site may not exist, just that this office does not have any available information of the area(s) at this time.”

The Saginaw Chippewa Indian Tribe was sent a copy of the DEIS.

**Table 7-1**  
**Detroit Intermodal Freight Terminal Project**  
**Summary of Interviews**  
**Livernois-Junction/CP Expressway Terminal Area**

Key Population Group  Issue	African American	Arab	Arab	Arab	Hispanic	Hispanic
	Original United Citizens of SW Detroit	Dr. Nabeel Abraham, Professor @ Henry Ford Community College	Congress of Arab Organizations of Michigan	ACCESS	CHASS - Community Health and Social Services	Detroit Hispanic Development Center
FACILITIES WHICH SERVE THE KEY POPULATION:	Kemeny Recreation Center, parks, schools, Neighborhood City Hall, roller rink, 30+ churches in the area. There is a Critical Care Unit in the city of Lincoln Park that serves area residents.	Two Yemen social clubs in the area, the mosque, retail district and schools (Star and Salina).	None Recorded	The mosque at 9945 W. Vernor, Star Academy on Lonyo, new housing near Roberts, new/expanded school for all grades on Wyoming.	Schools, churches, parks, recreation centers, commercial districts.	None Recorded
SERVICES FOR THE KEY POPULATION:	Kemeny programs for seniors.	ACCESS, various mosques around Detroit. Dearborn is enclave of Arab community. In Salina's school area, there is Yemeni population.	The National Conference for Community and Justice provides cooperation between law enforcement and the community and helps build bridges within the community	ACCESS with its many services, e.g., academic enrichment, family literacy, youth recreation, career development, community health and research, social services, employment training, cultural arts.	Increase in patient load due to upper respiratory diseases. Soccer leagues located at St. Hedwig Park located at Junction and Otis. Romanowski/Patton Parks may be affected because of the trucks.	None Recorded
ISSUES/CONCERNS AFFECTING THE KEY POPULATION:	Unemployment for young people in their 20s and 30s.	Physical improvements to the area. Jobs for the Yememi community, Homeland security and prejudicial treatment.	None Recorded	Area is very special in that it is the magnet for working-class Arabs worldwide to begin a new/better life. Revitalization is ongoing with new/refurbished homes, expanding schools to serve the growing population. It is not to be negatively impacted by traffic, and negative environmental factors, like air pollution.	Air quality, asthma and pollution. Increase in crime. Loss of housing. Lack of mobility due to increased truck traffic. Threats to potential development.	The DIFT Project is breaking up the community. The increase in trucks and the razing of homes will damage the community. Concerned that pollution will worsen asthma where too many people do not have health insurance.
OPPORTUNITIES AHEAD FOR THE KEY POPULATION:	Commercial development to support residents in the area. Park development.	The area is vibrant. Economic opportunities for those who are energetic.	More commercial and residential development	Community will continue to grow. It must not be set back by poorly designed projects.	Building of new Community Health and Social Services (CHASS) facility to handle patient flow.	The community is coming back. There will be growth.
OTHER ISSUES:	Environmental issues that affect the area. The possibility of truck traffic causing more problems with prostitution along Fort Street between Schaeffer and Outer Drive. Jobs that could result because many young men and women or young families need employment.	None Recorded	None Recorded	The community only has three access routes: Lonyo, Wyoming and Vernor/Dix. Closing Lonyo, more trucks on Wyoming and drainage problems on Vernor/Dix do not serve the Arab community well.	Fort St. Business Association is being developed to address commercial needs of area. More jobs need to be provided.	On the DIFT, target Spanish radio and newspapers to communicate.

**Table 7-1 (continued)**  
**Detroit Intermodal Freight Terminal Project**  
**Summary of Interviews**  
**Livernois-Junction/CP Expressway Terminal Area**

Key Population Group Issue	Hispanic	Hispanic	Hispanic	Hispanic	Native American	Polish
	Dominican Consulate	LA SED	MCDC	ROCA Eternal Church	American Indian Health @ Social Services	Cultural Pastoral Center
FACILITIES WHICH SERVE THE KEY POPULATION:	Evangelical churches in SW Detroit and St. Stephens on Central.	Churches, LA SED, other non-profits in the area.	Cesar Chavez schools, Latino Family Services, W. Vernor Commercial district, Michigan Avenue commercial district, MCDC District, Bagley Housing, BUOY 3, Roberto Clemente Recreation Center, Bowen Branch library, all Catholic churches especially the churches with schools.	Religious institutions that assist community residents with a variety of services.	The Native American facility on Lawndale serves the Native American community throughout the Metro Detroit area.	The Polish Leagues of American Veterans. Churches with Polish Masses.
SERVICES FOR THE KEY POPULATION:	Immigration processing has become much more difficult since 9/11.	Senior transportation to services, information referral, food and friendship programs.	Housing Development, jobs and economic development in the business district that employ people from neighborhoods. Economic development in the commercial districts.	Religious counseling, job referral, housing opportunities.	Health screenings, substance abuse counseling, youth mentoring programs, ethnic and spiritual gatherings.	No services here for the Polish people remaining. Churches like St. Francis, St. Hedwig and All Saints have larger numbers of Polish people than most churches in area. Some churches like St. Cunneghunda have had to consolidate with St. Barbara's in Dearborn because the membership has dropped so significantly.
ISSUES/CONCERNS AFFECTING THE KEY POPULATION:	Lack of education and training. English is an impediment amongst Dominicans.	Senior transportation and translation	Crime and the need for education.	Lack of education; learning English can be problematic for some. Employment opportunities are bad. Lack of available housing in this neighborhood forces people to locate outside the city of Detroit.	Uses of the land related to the Detroit Intermodal Freight Terminal Project. Culturally the American Indian has a spiritual connection with the land and does not want the land further damaged by industrial uses. Pollution of the trucks that will be entering the area.	Health care, employment, housing, immigration processing and education like learning English.
OPPORTUNITIES AHEAD FOR THE KEY POPULATION:	The lack of jobs with decent pay.	Access to services and jobs.	Locally-owned businesses, a strong workforce and the new image of Southwest Detroit as a stable and growing community.	Concern about jobs.	Improvements to the community such as housing, access to health care, cleanliness and respect for the rights of people.	The men want to work and are skilled but are the last to know about job opportunities. The businesses along Vernor have done very well because they cater to the Hispanic community so the money basically stays in the area.
OTHER ISSUES:	None Recorded	Does not see the benefits of the DIFT because the railroad terminal will eventually deteriorate. If nothing happens to fix the terminal it will only get worse. The truck traffic throughout the community affects the structural integrity of the businesses and homes.	None Recorded	Need for jobs.	None Recorded	None Recorded

**Table 7-1 (continued)**  
**Detroit Intermodal Freight Terminal Project**  
**Summary of Interviews**  
**Livernois-Junction/CP Expressway Terminal Area**

Key Population Group Issue	Polish	Other	Other	Other	Other
	St. Stephens	Bagley Housing	Bridging Communities	Casa Maria	Corktown CDC
FACILITIES WHICH SERVE THE KEY POPULATION:	Churches including St. Stephens which has a school K-8 of mostly Hispanic children. Twenty years ago the school was primarily Polish.	Churches and schools and the different social services agencies in the community.	Bridging Communities directly serves the elderly.	None Reported	Historic Most Holy Trinity Church, which is also a museum; The Gaelic League for the Irish community; The Maltese Club on Michigan Avenue; The Detroit Hispanic Development Center; The IBEW Hall. The historic housing in the area to be preserved and maintained as "Detroit's oldest neighborhood." The neighborhood is ethnically mixed with African Americans, Irish, Mexican, Puerto Rican, white and others. Schools.
SERVICES FOR THE KEY POPULATION:	Religious counseling and education.	Housing rehabilitation and new home construction for low-income families and seniors.	Outreach programs to the elderly by pairing young and elderly people as well as making neighborhood improvements.	Casa Maria provides after-school programs for children as well as prescription/medication referral.	Homeless soup kitchen on Michigan Avenue, near the Old SW Detroit Hospital; Homeless Shelter on Trumbull; Corktown CDC providing information as a conduit to city government; DHDC for Hispanic advocacy.
ISSUES/CONCERNS AFFECTING THE KEY POPULATION:	The Polish community has gone down in number because they are an aging population. Transportation for the seniors is an issue.	Environmental issues and traffic congestion. The DRTP proposal that would take trucks off the roads and put them directly on the freeway.	Violence (in all forms). Need to improve transportation, health care and support services, like the Family Independence Agency.	Housing and health care needs.	Focus on in-fill housing and continued preservation of historic homes. Developing Main Street USA appeal in the area.
OPPORTUNITIES AHEAD FOR THE KEY POPULATION:	The Polish community is no longer large in parish.	Rehabilitation of the MC Depot because it affects the business environment of the area.	Strong commercial and residential revitalization by newly-arrived people which improves the city's tax base and the overall quality of life in the neighborhoods.	Grant funding is not available	The Riverfront commercial/residential revitalization with a mixture of owner-occupied and rental units. Resolving the Tiger Stadium issue. Reducing Michigan Avenue from nine lanes to something less with a landscaped median, lights, sidewalks and trees to make it more pedestrian friendly. The MC Depot area. Condo renovation of the hotel on 14 <sup>th</sup> and 22 townhouses developed next to the condos. A museum behind Most Holy Trinity Catholic Church. Construction of 30 moderate rate homes built starting in July 2004. Connecting Mexicantown and Corktown through a greenway system.
OTHER ISSUES:	The church is located on Central Avenue which has a lot of heavy truck traffic.	SW Detroit is continuing to grow and any plans should take into account the changing nature of the community's ethnic diversity and the needs that result from that.	None Recorded	None Recorded	The neighborhood remains concerned about the DIFT and the effects of pollution and increased truck traffic. They are also concerned about the coordination and compatibility issues of the various transportation projects.

**Table 7-1 (continued)**  
**Detroit Intermodal Freight Terminal Project**  
**Summary of Interviews**  
**Livornois-Junction/CP Expressway Terminal Area**

Key Population Group Issue	Other Family Support Team of SW Detroit	Other Holy Redeemer Catholic Church	Other Hope Evangelical Ministries	Other Hubbard Richard CDC	Other Michigan Avenue Business Association	Other Michigan Livornois Neighborhood Council
FACILITIES WHICH SERVE THE KEY POPULATION:	Churches, schools and shopping along Vernor. Revitalization of Michigan Avenue shopping.	None Recorded	Churches, schools.	Grocery stores, restaurants along Bagley and Vernor, Saint Anne's Church, Webster school, Roberto Clemente Center, Matrix Theatre, Bagley Housing, MCDC, BUOY 3 Center.	Schools, churches, Boys & Girls Club,	Boys and Girls Club of Metropolitan Detroit on Livornois Ave. The Detroit Theatre Organ Society. Churches. Schools.
SERVICES FOR THE KEY POPULATION:	Various non-profits in the community that provide social services for families.	Churches and schools.	Church-provided services	None Recorded	Habitat for Humanity, which is planning to build 60 homes at West Grand Blvd. and Michigan Avenue.	None Reported
ISSUES/CONCERNS AFFECTING THE KEY POPULATION:	DIFT's affect on mobility and travel for area residents as a result of more trucks in the community. Physical separation caused by the DIFT.	Increased rates of asthma attacks. The dust from the Livornois Yard can be mitigated by paving, but still concerned about the emissions from increased number of trucks. Underpasses need to be clean and well lit. The idea of the railroads being good corporate citizens is key.	Lack of employment opportunities, inability to attract major food chains or large-scale development.	The Detroit River Tunnel and Ambassador Bridge plans, air quality, deterioration of infrastructure, health care, immigration and English as a second language, housing and employment.	Trucks, prostitution, accidents, air pollution.	Heavy traffic, especially when there is an accident on I-94.
OPPORTUNITIES AHEAD FOR THE KEY POPULATION:	New housing developments. Safer and sustainable communities. A family-orientated community.	The presence of the railroads and the infusion investment should help the community improve itself. Southwest Detroit can be a national model for neighborhood redevelopment that demonstrates a post-industrial community that rebounds to become a place where residents both live and work. Southwest Detroit is a place of cultural strength, a place of diversity.	Dismal outlook unless some major project comes to the area.	Small business and commercial growth, more population growth, sustainable neighborhood not dependent upon big box, franchise-owned companies.	More Hispanic businesses in the future. A Family Dollar Store, (mini K-mart). Street lighting for 2 ½ miles between Livornois and Wyoming on Michigan. Buffers between industry and community.	A new community group (the Michigan Ave Business Association) that is reaching out to local businesses. Some commercial opportunities for residential development attracted to the area.
OTHER ISSUES:	DIFT may pose some threat to potential developers and investments.	None Recorded	The area is suffering from lack of economic investment. The DIFT facility would positively affect the area with support businesses.	Increase in trade and commerce will offer benefits to the region, but to the smaller community there will be little rewards. The community views the DIFT as some sort of exploitation.	There should be a plan for infrastructure improvements; standards need to be increased to accommodate the growth of trucking in the area.	None Recorded



**Table 7-1 (continued)**  
**Detroit Intermodal Freight Terminal Project**  
**Summary of Interviews**  
**Livernois-Junction/CP Expressway Terminal Area**

Key Population Group Issue	Other	Other	Other	Other	Other
	Our Lady Queen Of Angels	Patton Park	Southwest Detroit Business Association	Southwest Detroit Improvement Association	SW Neighborhood City Hall
FACILITIES WHICH SERVE THE KEY POPULATION:	CVS, auto repair stores, grocery stores and the Michigan Avenue Corridor.	Patton Park, Romanowski Park, Holy Cross Cemetery.	Churches both Catholic and Pentecostal, parks, MCDC, commercial areas, the W. Vernor Commercial District, schools (Public, Private, and Charter).	Churches and schools, as well as the many non-profits, that provide services. The restaurants in the area are important because they provide local economic and cultural benefits.	The area of SW Detroit is an integrated community served by the many non-profits.
SERVICES FOR THE KEY POPULATION:	Churches, the Boys and Girls Club.	None Recorded	Restaurants and stores that provide unique cultural goods for the Hispanic community as well as the churches that provide Mass and services in Spanish.	Agencies such as LA SED, DHDC, Latino Family Services and others. Document preparation, job referral services, crisis intervention, housing referral.	The most significant services are the small businesses, mental health services, employment and training centers and domestic violence services as well as CHASS.
ISSUES/CONCERNS AFFECTING THE KEY POPULATION:	The biggest issues in the community deal primarily with trash, break-ins to private property and prostitution on Michigan Avenue. For the Hispanics, immigration and naturalization is a continuing problem, as well as employment opportunities.	Environmental impacts associated with the DIFT. Loss of community base. SW Detroit has been a dumping ground for industry. The continued dumping will destroy the revitalization that is taking place in the neighborhoods. Social/economic disservice to the minorities in the community. Closing Lonyo by the DIFT Project will impact the people who attend the soccer league games at the parks. Increased truck traffic will hamper residents ability to travel through the community. Loss of housing on Lawndale, Trenton and Cabot.	Air Quality. A healthy environment promotes stability for community residents. The dust at the Livernois Yard is a problem. Central and Livernois connectivity. Clark Park renovation (Ice Rink).	Unemployment, there is no work to be found in the immediate area. People have to travel outside Detroit to seek employment. Affordable rent. Health care is a big problem because many Hispanics are uninsured in the area. Asthma and other types of ailments. English as a second language. As it relates to the DIFT, community's concerns are the projected numbers of trucks and the routes of traffic.	Lack of proper lighting, abandoned cars and trash.
OPPORTUNITIES AHEAD FOR THE KEY POPULATION:	Renovation of housing and re-establishment of business along Michigan Avenue. This growth is primarily due to the Hispanic population. Every so often, a new business emerges along Michigan Avenue.	SW Detroit has an integrated community where people get along, raise families in ethnically diverse neighborhoods, supported by schools, community activities.	The "bow-tie" development at Vernor/Livernois. The Mexicantown Welcome Center and major rehabilitation of four buildings along W. Vernor. The Greenway network and links connecting different parts of the community. New businesses opening in the community. Soccer leagues continue to grow in popularity.	Community growth. The area is attractive because it's known as the Hispanic neighborhood and there is a sense of comfort for Hispanics in the area.	Southwest Detroit has experienced significant growth patterns. There will be better living and housing opportunities in the future.
OTHER ISSUES:	The Polish community has migrated out of the area.	Area is a dumping ground because of industry. Why don't they put the DIFT in Auburn Hills?	The cultural diversity of the area must be protected as well as the retention of young people. Must protect jobs that can be potentially lost due to the creation of a DIFT.	None Reported	Significant growth in the Hispanic community.

Source: The Corradino Group of Michigan, Inc.

**Table 7-2**  
**Detroit Intermodal Freight Terminal Project**  
**Summary of Interviews**  
**CP/Oak Terminal Area**

<b>Key Population Group</b> <b>Issue</b>	<b>Other</b>	<b>Other</b>	<b>Other</b>	<b>Other</b>
	<b>Far Northwest Neighborhood City Hall</b>	<b>Grandmont Rosedale Development Corporation</b>	<b>Southfield/Jeffries Business Association</b>	<b>West Warren Neighborhood City Hall</b>
FACILITIES WHICH SERVE THE KEY POPULATION:	Churches along the Southfield Freeway.	The North Rosedale Community House, The North Rosedale Park and a variety of churches.	River Rouge Park and the Churches on Southfield.	The O'Shea Recreation Center, churches, the North American Indian Association, Health Clinics along Warren and the local police precinct.
SERVICES FOR THE KEY POPULATION:	None Recorded	Headstart Programs and a PAL (Police Athletic League) football team that practices and plays in Stobel Park.	The churches are very active with the community and provide social activities. Sunday at church is an all-day event; parishioners arrive for services in the morning and stay until the late afternoon.	The large churches have many programs. No other organizations provide free health services, free breakfast for seniors, meals for indigents and community forums. The city has also started a new trash pick-up system.
ISSUES/CONCERNS AFFECTING THE KEY POPULATION:	None Recorded	The lack of city services and the quality of the schools. Air quality. The Southfield Freeway, which is one of the busiest freeways in the nation. High incidents of asthma.	Traffic. Trucks using the intermodal facility travel through residential areas to get to the yard. A truck-only road for the CP/Oak facility would benefit the community and should be designed so that local business can use it as well. A good sound wall is needed as is better lighting in the yard.	Crime, lighting, vacant lots, abandoned houses, and trash.
OPPORTUNITIES AHEAD FOR THE KEY POPULATION:	Stabilization of housing and the increase of housing and commercial development.	A stable neighborhood with room to grow. If the city services are improved, the community will grow.	This area has never deteriorated and the city is constantly updating and fixing the area with grants. Main concern is traffic.	Neighborhood city hall has 14 inspectors whose job it is to get the trash off the streets and encourage people to maintain their property. Business moving in, people moving in, filling the vacant housing.
OTHER ISSUES:	There are no parks, schools or public places around the CP/Oak terminal area.	Traffic is bad on both the residential and city streets.	The railroad can be a good neighbor to the community. The rail yard should complement the neighborhood and be aesthetically pleasing.	A stable and diverse area. People of ten different nationalities live in area. More people of Arab decent are moving in.

Source: The Corradino Group of Michigan, Inc.

**Table 7-3  
Detroit Intermodal Freight Terminal Project  
Summary of Interviews  
CN/Moterm Terminal Area**

Key Population Group Issue	Arab	Arab	Other	Other
	Chaldean Sacred Heart	Arab American & Chaldean Council	Bagley Association	Eight Mile Boulevard Association
FACILITIES WHICH SERVE THE KEY POPULATION:	Facilities that serve the Chaldean community between Woodward Avenue and John R. on Seven Mile -- ethnic grocery stores, education centers and restaurants that are Chaldean owned and operated.	Arab American & Chaldean Council.	Shopping along Eight Mile, Seven Mile and Livernois. The schools, churches and homes of the area are all important considerations.	The many storefront businesses in the area as well as the Chaldean community along Seven Mile providing retail opportunities to the area's residents. The Chaldean Community Center.
SERVICES FOR THE KEY POPULATION:	A variety of services ranging from transition and immigration to education and business entrepreneurial efforts.	Employment training, teen programs, behavioral health, dental care, youth center and computer lab.	The church-based programs including those for abused women.	Those provided by schools and churches and the Chaldean Center.
ISSUES/CONCERNS AFFECTING THE KEY POPULATION:	Many Chaldean families are moving back to Detroit and specifically that area between Seven and Eight Mile Roads, Woodward and John R.	Revitalization of Chaldean Town.	Empty buildings along Wyoming, Livernois, and Seven Mile. The reduction of city services because of budgetary issues.	Deterioration of the roads as a result of higher truck traffic volumes and an ongoing lack of maintenance. These conditions may result in a deterioration of the residential base. The projected DIFT development does not offer anything that appears to be aesthetically pleasing.
OPPORTUNITIES AHEAD FOR THE KEY POPULATION:	Chaldeans develop businesses that can support industry.	Cooperation from city, state, and federal governments to improve infrastructure. Want the area to be shopper friendly and a destination, like Greek Town.	Small business development along Livernois. Small-scale industrial or manufacturing businesses.	The proposed Outlet Center development at the southeast corner of Woodward and Eight Mile. Bringing the Woodward bridge down. Use of the Fairgrounds for residential development.
OTHER ISSUES:	None Recorded	Funding of Chaldean programs.	None Recorded	The diversity of the area.

**Table 7-3 (continued)**  
**Detroit Intermodal Freight Terminal Project**  
**Summary of Interviews**  
**CN/Moterm Terminal Area**

Key Population Group Issue	Other	Other	Other	Other
	Ferndale Public Schools	Ferndale Chamber of Commerce	Hazel Park	I-CARE
FACILITIES WHICH SERVE THE KEY POPULATION:	Seven public schools and one charter school in the City of Ferndale. The closest school to the railroad terminal in Ferndale is Wilson Elementary.	The commercial and residential developments along Eight Mile Road. Woodward and Nine Mile are the life blood of the city.	None Recorded	Strong residential areas on both sides of Eight Mile Road along Eight Mile, Nine Mile, Woodward, Livernois, and Seven Mile. Various churches, schools, the State Fairgrounds, libraries, museums (9 Mile & Livernois) and recreational center (Kulick Center, Tindal, etc.) The industrial area between Eight and Nine Mile on the east side of the CN/Moterm terminal (jobs and tax base of Ferndale). Hilton Apartments for seniors and low-income persons. The Chaldeans have an established commercial district and residential area along Seven Mile. There will also be a community center built because of the large grants that were awarded to the Chaldean community.
SERVICES FOR THE KEY POPULATION:	Education.	None Recorded	The Chaldean community is growing in both residential and business areas. The Chaldeans have a social club called the Eastern Palace, which is located on the west side of John R. There are some new businesses off Nine Mile on John R on the west side that are Chaldean owned and operated.	Various community festivals in Ferndale throughout the summer, Woodward Dream Cruise. Woodward is a National Heritage Route.
ISSUES/CONCERNS AFFECTING THE KEY POPULATION:	The school system has bus routes that cross railroad tracks at the following locations: Hilton Rd., Nine Mile, Camborne and Woodward Heights. Trains that block traffic are a problem because they cause delays for commuters and school buses.	The main issue of concern related to the DIFT is the possible affects of loss of housing or businesses if the expansion were to happen inside the city of Ferndale.	Webster School is very close to the DIFT expansion area in the Fairgrounds.	The main issues associated with the DIFT are: noise, pollution (air quality and increased asthma), increased truck traffic, depreciation of housing values, threats to potential developments and the loss of police because of decreased tax base. In Ferndale the fire response times would be affected because of the long trains blocking Nine Mile Road. Affects on the low-income neighborhood east of the Fairgrounds, negative affects to the Cool Cities Grants from the Governor. Need for DIFT has not been proven. Homeland security issues: Haz-mat in containers and the lack of funding to deal with an issue if it should arise. The appearance of an "us vs. them" situation between Ferndale and Detroit. Lack of conceptual drawings to display what the DIFT proposal could possibly look like.
OPPORTUNITIES AHEAD FOR THE KEY POPULATION:	Loading and unloading of trains should be restricted during school hours. School buses are assigned to use Eight and Ten Mile Roads to avoid the tracks as much as possible.	The City of Ferndale is land locked to the point that the only way to build new is to knock down old.	The city is 100% developed. Any efforts to construct in Hazel Park would involve redevelopment. The race track is the only "open" area that can be redeveloped. However, it is privately owned and the owners can do what they feel is necessary for their business.	Huron Metro Park at the Fairgrounds.
OTHER ISSUES:	None Recorded	There are no ethnic enclaves in the City of Ferndale.	Against the DIFT because it is incompatible with the residential character of the area and it will have an adverse environmental impact on the western residential areas of Hazel Park.	Ferndale is very integrated with people of different ethnic backgrounds. There is a large gay community in Ferndale that celebrates Pridefest in which more than 29,000 people attend annually.

Source: The Corradino Group of Michigan, Inc.

**Table 7-4  
Detroit Intermodal Freight Terminal Project  
Summary of Interviews  
Outside of Terminal Areas**

Key Population Group Issue	African American	African American	African American	German
	Alkebulan Village	Black Family Development	Operation Get Down	Detroit Schwaben Unterstuz Verein
FACILITIES WHICH SERVE THE KEY POPULATION:	4 H Club, Sub-Center	None Recorded	Every Organization	The German Community is scattered throughout the Detroit area. When Germans come to work at Daimler-Chrysler they usually go to the "Carpathia" to socialize. "Carpathia" is located between Sixteen and Seventeen Mile Roads.
SERVICES FOR THE KEY POPULATION:	Sub-Center provides youth programs, and after-school programs. Operation Get Down provides emergency services and shelter for people that have drug abuse problems.	None Recorded	Wide range of Issues	This organization created the Schwaben Aid Society to assist elderly Germans with medical care. They have about 120 members
ISSUES/CONCERNS AFFECTING THE KEY POPULATION:	There needs to be more jobs and job training. Utility companies have to have more sensitivity in the winter months, helping people pay their bills and not shutting off their water and heat.	The low number of Spanish-speaking officers in the police departments and the lack of Latino representation on City Council.	Substance abuse, education and mental health	The lack of migration by other Germans from Europe. They stopped coming here for many reasons but mainly because of the lack of industrial jobs.
OPPORTUNITIES AHEAD FOR THE KEY POPULATION:	If jobs and job training do not improve, the community will die.	Include Spanish in curriculum. Teaching Spanish will open up Central and South America to create a radical economic impact on Detroit.	Jobs, health issues, social services.	The aging population.
OTHER ISSUES:	None Recorded	Crime. Change from enforcement as solution to looking at societal solutions, such as unemployment and poverty. Change the city charter to balance between Mayor and City Council. Redistrict so that Latinos get fair representation on City Council.	None Recorded	The German outmigration from Detroit



**Table 7-4 (continued)**  
**Detroit Intermodal Freight Terminal Project**  
**Summary of Interviews**  
**Outside of Terminal Areas**

Key Population Group Issue	German	Hispanic	Hispanic	Irish
	German-American Cultural Center	Local Historian Osvaldo Rivera on Detroit Puerto Rican Community	Wayne State University Chicano/Boricua Studies Program	Gaelic League Irish Society
FACILITIES WHICH SERVE THE KEY POPULATION:	Carpathia Club	The Catholic and Evangelical churches/schools. The Puerto Rican Club.	Mexicantown Center, LA SED, Puerto Rican Club and churches in the area.	Gaelic League on Michigan Avenue, Ancient Order of Hibernians located on Grand River and Telegraph, Friendly Sons of St. Patrick located on Eight Mile and Van Dyke.
SERVICES FOR THE KEY POPULATION:	None Reported	Non-profits like LA SED and Latino Family Services.	Access to education and family counseling	The Gaelic League offers cultural festivals and concerts by artists directly from Ireland. They also participate in the Irish/Mexican festival in June. The St. Patrick's day parade/festival is the biggest of the year.
ISSUES/CONCERNS AFFECTING THE KEY POPULATION:	None Reported	Education/crime/lack of political candidates running for office.	Lack of employment. Recruitment by gangs to sell drugs due to a lack of employment. Lack of affordable health care	Irish people have spread throughout the tri-county area.
OPPORTUNITIES AHEAD FOR THE KEY POPULATION:	The German population is getting smaller because there are fewer Germans migrating into southeastern Michigan.	Puerto Rican leaders don't see themselves in positions of authority mainly because in the Hispanic community they are the minority.	Leadership of Latino leaders. Better Latino organizations	None Recorded
OTHER ISSUES:	None Recorded	Non-profits like LA SED and Latino Family Services.	None Recorded	The Corktown neighborhood is no longer an exclusively Irish neighborhood. There is a mixture of cultures in that area such as the Maltese, Irish, Black, Puerto Rican and Mexicans

**Table 7-4 (continued)**  
**Detroit Intermodal Freight Terminal Project**  
**Summary of Interviews**  
**Outside of Terminal Areas**

Key Population Group Issue	Polish	Polish	Other	Other
	Hamtramck Historical Commission	The Polish Weekly	Covenant House	Northeast Neighborhood City Hall
FACILITIES WHICH SERVE THE KEY POPULATION:	St. Florian Church. Polish American Veteran's Hall.	Catholic churches throughout the area like St. Florian, St. Peter and Paul, St. Hedwig. The city of Hamtramck is a Polish enclave.	Human Service agencies, parks, recreation centers, schools and churches.	Detroit Public Schools are the most important facilities that provide education to Asian children.
SERVICES FOR THE KEY POPULATION:	The Polish National Alliance.	This Polish newspaper provides information on events and services. Restaurants, churches and PAV clubs in Hamtramck all provide socialization for the Polish people.	Covenant House provides students with tutoring and shelter.	There are no services or non-profits that specifically provide services for the Asian community in the area. The Hmong community has a spiritual leader.
ISSUES/CONCERNS AFFECTING THE KEY POPULATION:	Concern about the future of Hamtramck.	Older community of Polish people who need health care.	Young people are dropping out of school at a high rate and trying to find work. This population is not being served at no fault of its own. The resources are just not being provided. Obtaining identification is sometimes a challenge for young people.	Once an Asian family has the financial resources to move out of the city they migrate into the northern cities of Macomb County along Van Dyke. The most important issues of concern to this community is learning English.
OPPORTUNITIES AHEAD FOR THE KEY POPULATION:	The Polish community and organizations coming together to promote their culture.	Continued efforts to promote and preserve Polish culture	Rehabilitation of homes and businesses is happening everyday on Vernor now on Michigan Ave. and to a lesser extent on Fort St.	Many Asians have expressed interest in business development.
OTHER ISSUES:	None Recorded	None Recorded	Does not know much about the DIFT only heard the negatives of pollution and increased truck traffic. Wants to see what the potential benefits for the community in terms of jobs and organization of truck traffic.	None Recorded

Source: The Corradino Group of Michigan, Inc.

#### **7.4 Public Hearing, Public Comments, and Responses**

*Public Hearings were held June 13, 14, 15 and 16, 2005, at LASED Youth Center, IBEW Local 22, The Holiday Inn in Grandmont, and The Michigan State Fairgrounds, respectively. Total attendance at the meetings was approximately 290 persons. The numbers of comments received are as follows:*

- 34, 23, 15, and 43 people, respectively over the four nights, speaking at the public hearing or giving oral comments to court recorders (total 115 persons – note that some were repeat speakers over the four hearings)*
- 28 comment forms turned in at the hearings or received before the close of comments on March 12, 2004.*
- Numerous signatures on petitions*
- 10 e-mails*
- 13 comments recorded onto the web site*
- 26 letters from individuals, groups, or public entities*
- 12 letters from resource agencies and elected officials*

*Full copies of all comments (including the public hearing transcript) can be reviewed at the locations listed in the preface to this FEIS.*

*The following pages represent comments received from the general public and a number of organizations. They are organized by category in Table 7-5.*

*It should be noted that a commenter often had multiple comments or issues.*

*Comments received from agencies and government entities are treated separately in Appendix F.*

**Table 7-5**  
**Comment Categories Used to Sort Comments**

Process	Impacts - security
Purpose and Need	Impacts - stormwater
Alternatives	Impacts - stress
Impacts	Impacts - trucks
Impacts - 4(f)	Impacts - tax base loss
Impacts - AQ	Impacts - tax increase
Impacts - benefits	Impacts - wetlands
Impacts - business	Mitigation - air
Impacts - community cohesion	Mitigation - buffer
Impacts - construction	Mitigation - Community Benefits Agreement
Impacts - cultural resources	Mitigation - construction
Impacts - cumulative	Mitigation - context sensitive design
Impacts - disproportionate	Mitigation - general
Impacts - economic analysis	Mitigation - jobs
Impacts - EJ	Mitigation - lighting
Impacts - farmland	Mitigation - limits to intermodal
Impacts - general	Mitigation - noise
Impacts - hazmat	Mitigation - noise monitoring
Impacts - insurance costs	Mitigation - sustainable
Impacts - interviews	Mitigation - SW Detroit Plan
Impacts - land use	Mitigation - truck routes
Impacts - noise	Mitigation - vibration
Impacts - parks	Public Involvement - ads
Impacts - property values	Public Involvement - cultural outreach
Impacts - quality of life	Public Involvement - governance
Impacts - relocation	Public Involvement - meetings

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Process	I'm concerned about a method of presenting alternatives that occurred in the DIFT. First MDOT presents alternatives that outrage the community, then it comes back with revisions that capture a small amount of the community input.	MDOT has worked throughout the project to obtain and understand community input (see Section 7), and community input has shaped alternatives development and the selection of the Preferred Alternative, which includes a number of features suggested by community members.	1
Process - areas of controversy	Section 1.4 "Areas of Controversy" on page 1-66 provides only one sentence on potential negative impacts. More information and detail is necessary for evaluation purposes.	More information and detail are provided <b>in Section 1.23 of this FEIS</b> .	1
Process - legal sufficiency	The DEIS does not meet the requirements of NEPA.	This document has been reviewed for legal sufficiency by the Federal Highway Administration and was approved as meeting the requirements of the NEPA process.	3
Purpose and Need	The DIFT Project is not needed.	The Purpose and Need for the project are fully documented in Section 2.	17
Purpose and Need - beneficiaries	The railroads will be the only beneficiaries of the DIFT.	While the railroads will benefit, so will the public through a stronger economy. And, jobs will be generated as defined in Section 4.5.	3
Purpose and Need - beneficiaries	The DIFT Project is only needed by the railroads.	The Purpose and Need for the project are fully documented in Section 2. The railroads will contribute financially to the Preferred Alternative in proportion to the benefits that will accrue to them. MDOT and FHWA will also invest because there is a public need for and a public benefit from this project.	1
Purpose and Need - capacity & demand	The data presented demonstrate that the DIFT is actually designed to create additional intermodal capacity demand, rather than to satisfy it.	Capacity and demand are separate. The DIFT Preferred Alternative will not "create" demand, but respond to it.	1
Purpose and Need - capacity/efficiency	The data in the DEIS indicate there is a need to provide additional terminal capacity, but it is unclear how capacity efficiency was calculated for the Detroit region. The Purpose and Needs Section could be improved by including a more complete explanation of how capacity targets were determined.	There are systemic reasons for the demand for intermodal freight movement: the price of fuel, the congestion of highways with limited ability to improve capacity and the cost competitiveness of shipping by rail. The limitation on existing terminal capacity in the Greater Detroit Area is documented in Section 2.2. Alternatives to improve existing rail yards are covered in Section 3. Increasing the size of the terminals and making improvements to the tracks in the area outside will increase efficiency as well as terminal capacity.	3



## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Purpose and Need - capacity/efficiency - 1998	The DEIS states that the maximum possible capacity at the four existing terminals is only 345,000 lifts. Yet on the preceding page it notes that 400,000 lifts were accommodated in Detroit in 1998.	The historical trends in intermodal activity and reasons for them are recognized in the EIS. Modern supply chain logistics, just-in-time manufacturing and deployment, and leaner organizations have revolutionized the way industry and the military transport freight. There is a need for additional capacity by the 2030 planning horizon. The limitation on existing terminal capacity is documented in Section 2.2. There are systemic reasons for the demand for intermodal freight movement: the price of fuel, the congestion of highways with limited ability to improve capacity and the cost competitiveness of shipping by rail. Terminals can operate over capacity but, like roads, do not do so efficiently.	1
Purpose and Need - capacity efficiency - Alternative 2	It is unclear how only expansion alternatives can meet the purpose and need and why improvements at the existing yards in the area would not improve efficiency and also capacity.	The alternatives noted in the comment on improving existing rail yards are covered in Section 3. One such option is Alternative 2. But, increasing the size of the terminals, in response to the forecast demand, will create a more efficient intermodal system. Improvements to the tracks in the area will also increase efficiency, but these improvements do not increase terminal capacity.	2
Purpose and Need - capacity efficiency - intermodal growth	The DEIS notes that the capacity of intermodal terminals in the region is about 345,000 annual lifts, but fails to explain how the region handled 400,000 lifts in 1998. How can we be sure that the economic and security concerns that caused the decline will not affect intermodal trains in the future?	The limitation on existing terminal capacity is documented in Section 3. Regional and national economic conditions have softened causing a reduction, for a time, in the demand for all kinds of transportation, including intermodal. Reputable economic forecasters, such as IH Global Insight, see the freight demand increasing significantly as the economy rebounds in 2010 and beyond. Terminals can operate over capacity but, like roads, do not do so efficiently.	2
Purpose and Need - capacity efficiency - paving	It has not been shown how capacity can be increased by means other than expansion.	A terminal needs more space to gain more capacity. Some limited increase in efficiency on the existing terminal space, by paving or stacking, containers higher, can be gained.	1
Purpose and Need - containers/trade	What is the net import/export effect resulting from each of the Action Alternatives vs. No Action?	The economic impact analysis presented in Section 4.15 is based on historical trends which have included the globalization of the economy for years. That analysis indicates the Preferred Alternative will create a net increase of 4,500 jobs in the state of Michigan.	5

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Purpose and Need - containers/trade - railroads	How do you justify the taking of public land needed for recreation to help a foreign corporation, which pays no local taxes, to distribute foreign manufactured products that have cost us our jobs?	The railroads will contribute financially to the Preferred Alternative in proportion to the benefits that will accrue to them. MDOT and FHWA will also invest because there is a public need for and a public benefit from this project. No public land for recreation will be acquired for the Preferred Alternative.	1
Purpose and Need - forecasts	It appears that the number of lifts for 2025 may be overstated, suggesting the Commodity Flow Model is inaccurate, and that the analysis unfairly rates no expansion alternatives poorly and favors expansion alternatives.	This FEIS states the position of the railroads that reviewed the forecasts of the Action Alternatives. They indicated that the high end of each 2025 forecasted lift range are optimistic, but reasonably so, in light of the horizon year being more than 20 years in the future. No expansion in response to the forecasts does not address the project's purpose and need.	3
Purpose and Need - forecasts - external improvements	Lift projections for the Action Alternatives rely on unsubstantiated assumptions that improvements will also be made to intermodal terminals and rail connections in Chicago, Indiana and Ohio. No evidence is provided suggesting that improvements at facilities in Indiana and Ohio are even being considered, much less planned.	These assumptions about intermodal expansion in other places, like Chicago or Indianapolis, constrain, not increase, intermodal demand in the Detroit area. Additionally, intermodal improvements in Chicago are ongoing as part of a program known as CREATE, demonstrating the assumptions are realistic.	1
Purpose and Need - forecasts - factors	The Commodity Flow Model apparently does not account for all relevant factors. Twenty factors in the National Cooperative Highway Research Report were identified as impacting intermodal freight demand, yet the CFM report notes only several were considered. Also, there is no evidence that specific recent changes in the economy were considered, most notably the decline of the manufacturing sector, especially the auto industry in the Detroit area.	The intermodal model accounts for the factors most directly affecting conditions in the Detroit area. The degree of explanation of these factors on intermodal activity in the Detroit area is included in the <i>Commodity Flow Model Technical Report</i> .	2
Purpose and Need - forecasts - manufacturing economic analysis	The expansion of intermodal facilities is unnecessary given the changes in the State's economy since this project was first proposed.	The economic impact analysis, presented in Section 4.5, is based on historical trends which include the globalization of the economy for years. That analysis indicates the Preferred Alternative will create a net increase of 4,500 jobs in the state of Michigan.	1
Purpose and Need - forecasts - intermodal growth	Manufacturing methods have changed, bringing suppliers closer. That lessens the need to ship parts great distances.	There are systemic reasons for the demand for intermodal freight movement: the price of fuel, the congestion of highways with limited ability to improve capacity and the cost competitiveness of shipping by rail.	1

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Purpose and Need - forecasts - model	The stated need for an expanded intermodal facility is based on old studies.	An intermodal freight forecasting model was developed specifically for this study. The limitation on existing terminal capacity is documented in Section 2.2. There are systemic reasons for the demand for intermodal freight movement: the price of fuel, the congestion of highways with limited ability to improve capacity and the cost competitiveness of shipping by rail.	3
Purpose and Need - forecasts - need	Why does the DEIS use optimistic lift numbers to show need?	The EIS uses high forecasts for the Action Alternatives and a low forecast for No Action to determine the most significant level of impacts. The forecasts are appropriate.	1
Purpose and Need - forecasts - previous	Why is it assumed that earlier demand and capacity numbers developed by Mercer Management and Consulting are incorrect?	The explanation of the earlier forecasts is provided in Section 2.2. As noted in Section 2.2.1, the forecast made in 1994 for 2002 was exceeded by the actual intermodal activity in 2002 in the Detroit area.	1
Purpose and Need - forecasts - recent growth	Why does the DEIS use preliminary results from January 2004 to illustrate demand versus capacity? Is more recent data available?	The DEIS was written in the spring of 2004. There are systemic reasons for the demand for intermodal freight movement: the price of fuel, the congestion of highways with limited ability to improve capacity and the cost competitiveness of shipping by rail.	1
Purpose and Need - forecasts - terminal size	It is stated that railroads have consolidated intermodal services and that smaller facilities have been eliminated from consideration for the DIFT. The Local Advisory Council tour in Chicago visited the 59th Street CSX intermodal facility of 150 acres and the BNSF Corwith facility of 300 acres and was informed that the latter, which is the size of the existing Livernois-Junction Yard, is the largest intermodal facility in Chicago.	The statement in the EIS is correct. In the Detroit area, nine intermodal terminals in existence in 1994 have consolidated to six, while intermodal activity has grown.	1
Purpose and Need - forecasts - trends	The claim that substantial new capacity is needed relies on the study from 1994 that projects significant increases in intermodal needs in the region. In fact intermodal activity has fallen from a high of 400,000 lifts in 1998 to a level in 2002 that is almost as low as it was in 1994.	The historical trends in intermodal activity and reasons for them are recognized in the EIS. Modern supply chain logistics, just-in-time manufacturing and deployment, and leaner organizations have revolutionized the way industry and the military transport freight. There is a need for additional capacity by the 2030 planning horizon. The limitation on existing terminal capacity is documented in Section 2.2. There are systemic reasons for the demand for intermodal freight movement: the price of fuel, the congestion of highways with limited ability to improve capacity and the cost competitiveness of shipping by rail.	2

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Purpose and Need - industry support	What assurances or letters of support have been submitted by industry, particularly the automotive manufacturing sector?	DaimlerChrysler has stated it values intermodal transportation as an efficient, cost effective alternative to truck and rail modes and believes it will play a role in the Southeastern Michigan transportation network. It supports the completion of the EIS and will review the results. Ford has indicated, while it uses intermodal service, its "Overall business plan for intermodal services is projected to remain flat into the foreseeable future". NS, CN and CP all signed the Memorandum of Understanding supporting the DIFT study process to address the future intermodal needs of the Detroit area. CSX has joined these railroads in signing the Pre-Development Plan Agreement, the successor to the Memorandum of Understanding.	2
Purpose and Need - industry support - purpose and need	Section 1, page 166, of the DEIS identifies areas of controversy. One controversy is omitted, the project's Purpose and Need. General Motors and Daimler Chrysler have been silent, while Ford has publicly stated they have no needs for incremental intermodal services. It appears the purpose of the project is to create intermodal demand or capture demand, rather than response to demand. The demand versus capacity forecast on page 26 makes the assumption that NS intermodal will consolidate at Livernois-Junction, and does not include Oakwood, Delray or Willow Run in its calculations of capacity, although that capacity is in use.	Relatively few substantive comments have been received on purpose and need, and it has not been considered an area of controversy. Intermodal demand cannot be "created." The Delray and Willow Run facilities of Norfolk Southern may be consolidated to the Livernois-Junction Yard area under the Preferred Alternative.	1
Purpose and Need - mass transit	The money to be spent on the DIFT should go toward funding mass transit.	Comment acknowledged. MDOT and FHWA support mass transportation as well as highway and rail-related improvements, usually through different funding sources.	1
Purpose and Need - national defense	The DEIS does not fully explain the statement that the DIFT is needed for national defense.	The military handles a component of its logistics via intermodal operations. Specific data are classified and not available for public dissemination.	4
Alternative	An action alternative is favored at Livernois-Junction Yard that provides paving, buffering, access gates at Wyoming and Livernois, and that addresses intermodal needs of the State.	Comment acknowledged. The Preferred Alternative does each of these and meets the project purpose and need.	1
Alternative - for	MDOT is urged to proceed with the DIFT.	Comment acknowledged.	2
Alternative - non-induced	Alternatives considered should address both induced and non-induced growth.	The project purpose and need anticipates growth and the project meets that anticipated growth. This includes induced and non-induced growth for Section 4.1.	1

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Alternative 2	Alternative 2 is not sufficient.	The Preferred Alternative provides greater intermodal capacity than Alternative 2.	1
Alternative 2 - against	Alternative 2, Option A is not favored.	Comment acknowledged.	1
Alternative 2 - for	Alternative 2 is favored.	Comment acknowledged.	1
Alternative 3	The DIFT is strongly supported, but not at the Fairgrounds.	Comment acknowledged. The Preferred Alternative does not affect the Moterm Terminal and CN has indicated it is not planning to expand the Moterm facility in the near future.	1
Alternative 3 - against	Alternative 3, or any other consolidation of regional intermodal activity at a single location in Southwest Detroit that provides little or no direct benefit to the City of Detroit or neighborhoods surrounding the Yard, while imposing numerous traffic, environmental health, safety, social and economic costs, is opposed.	This comment reflects an early City resolution. In a later resolution passed July 27, 2005, the Detroit City Council urged MDOT to invest in the Livernois-Junction Yard, consistent with the needs of the surrounding community, and found the No Action Alternative to be unacceptable.	1
Alternative 3 - for	Put the DIFT at the Livernois-Junction Yard.	Comment acknowledged.	1
Alternative 3 - for - no danger	Alternative 3 is favored as it does not pose danger to the surrounding area.	Comment acknowledged.	1
Alternative 4	Alternative 4 is the best alternative.	A modified Alternative 4 is the Preferred Alternative. It is smaller, as the CP/Expressway operation has ended and expansion of the CN/Moterm Terminal into the Fairgrounds is no longer part of the alternative. The Preferred Alternative will be associated with a governance structure. See the Pre-Development Plan Agreement in Appendix F.	16
Alternative 4 - modified	Alternative 4 is the favored alternative, but with some modifications.	Comment acknowledged. A modification of Alternative 4 has been identified as the Preferred Alternative and a plan has been included in Section 5 to address specific community issues.	4
Alternative 4 - modified - trucks	Alternative 4 is favored if truck traffic issues are addressed.	A modification of Alternative 4 has been identified as the Preferred Alternative and a plan has been included in Section 5 to address specific community issues. This alternative removes many trucks each week that now use neighborhood streets to access the truck center at the northwest corner of the intersection of Central and John Kronk.	1
Alternatives 3 & 4	Alternatives 3 and 4 are the best. The area is already in disrepair.	Comment acknowledged.	1
Alternative CN Moterm	There should be no expansion at CN Moterm.	Comment acknowledged. The Preferred Alternative does not affect the Moterm Terminal and CN has indicated it is not planning to expand the Moterm facility in the near future.	3

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Alternative - Community Improvement Plan	A community improvement plan is favored.	Section 3.2.3 notes that the Communities for a Better Rail Alternative Community Improvement Plan (CIP) called for interchanges that cannot be built and fails to meet the project purpose and need, which requires expansion. Nonetheless, a number of elements of the CIP (e.g., a balance of access between Wyoming and Livernois Avenues; closing the Waterman entrance; future accommodation of transit (commuter rail); internal truck circulation; Central rebuilt below grade; removal of trucks from neighborhood streets; a buffer around much of the facility; job creation for residents) have, in fact, become components of the Preferred Alternative by design and through a series of actions included in Section 5. These actions will be done in partnership with the railroads.	6
Alternative - concurrence	The selected alternatives should be carried forward.	Comment acknowledged.	1
Alternative - CP Expressway - against	The CP Expressway Terminal should not be included as part of the DIFT.	The CP Expressway operations were suspended in June 2004 and are not to resume as part of the Preferred Alternative. There is no provision for CP/Expressway anywhere in the Preferred Alternative.	5
Alternative - CP Oak issues	There is concern with issues associated with CP Oak such as access, safety and residential relocation.	The Preferred Alternative does not involve any change at the CP/Oak Terminal. The CP intermodal activity there will be transferred to an expanded Livernois-Junction Yard as part of the Preferred Alternative. This does not mean the Oak Terminal will close or shrink in size, but it will not be the location of CP's intermodal container operations.	3
Alternative - Dix gate	A Dix/Waterman gate is unacceptable.	The Preferred Alternative does not include the Dix/Waterman gate in the long-range future of intermodal at the Livernois-Junction Yard.	17
Alternative - Fairgrounds - against	The Fairgrounds should not be used as part of the DIFT.	The Preferred Alternative does not affect the Moterm Terminal or Fairgrounds and CN has indicated it is not planning to expand at the Moterm facility in the near future.	42
Alternative - Fairgrounds - footprint	Did the acreage of the Fairgrounds proposed for use in the DIFT change?	The CN Moterm terminal and/or Fairgrounds are not a part of the Preferred Alternative.	3
Alternative - Fairgrounds - for	Locating the DIFT at the Fairgrounds is better than locating it at its expanded Ferndale site.	Expansion in Ferndale was not considered practical as noted in Section 3.4.1. But this terminal (Moterm) will not be expanded as part of the DIFT Preferred Alternative.	2



## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Alternative - Intermodal - water	A water component should be added to the DIFT.	There is virtually no opportunity to depend on waterborne intermodal shipments due to conditions of lake locks transportation and weather conditions affecting the lakes and St. Lawrence Seaway. According to the Great Lakes/St. Lawrence Seaway Study (Army Corps of Engineers, February 2003) only five percent of the world's container vessel capacity can be accommodated by the locks of the St. Lawrence Seaway.	3
Alternative - Livernois-Junction - against expansion	Our community vehemently opposes the expansion of the Livernois-Junction Yard.	Comment acknowledged. The Preferred Alternative expands the Livernois-Junction Yard by 160 acres, a reduction of over 200 acres from Alternative 3 presented in the DEIS.	1
Alternative - No Action - against	The No Action Alternative is unacceptable.	The No Action Alternative must be carried through the DEIS stage and is not the Preferred Alternative. The Preferred Alternative does not involve the CN/Moterm Terminal and eliminates the closed CP/Expressway operation. It is also associated with a series of improvements.	19
Alternative - No Action - against - government needed	The No Action Alternative is unacceptable and government involvement is needed.	No Action is not the Preferred Alternative. The railroads, MDOT and FHWA have chosen a Preferred Alternative which includes governance and funding structures among these partners to implement the DIFT Project.	5
Alternative - No Action - against DIFT	The No Action Alternative is favored and the DIFT is opposed in any form.	Comment acknowledged. But, No Action is inconsistent with the official plans of the City of Detroit and the City of Dearborn and does not meet the project purpose and need.	9
Alternative - No Action - against private action	Private expansion activities are opposed.	The proposed project has been developed so government can act in partnership with the railroads to improve the efficiency of goods movement.	1
Alternative - No Action - citizen opposition	There is strong citizen opposition to the DIFT.	Comment acknowledged. But, support is also evident at the Detroit City Council, and in the Southwest Detroit area where the Preferred Alternative will largely be implemented.	2
Alternative - No Action - for	Intermodal expansion in Detroit and/or Dearborn is opposed.	Comment acknowledged. However, No Action does not meet the project purpose and need. And, the Preferred Alternative improves conditions at and around rail yards, reduces truck volumes in neighborhoods, and stimulates community improvements.	8

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Alternative - No Action - for - against pollution	A No Action Alternative is favored to limit pollution and noise.	Comment acknowledged. However, No Action won't improve conditions at or around rail yards, improve truck volumes or routes, or stimulate community improvements physically or economically. The Preferred Alternative offers more protections for air, water and noise pollution than the No Action Alternative.	1
Alternative - No Action - for - Ferndale	The DIFT is firmly opposed in Ferndale.	The Preferred Alternative does not affect the Moterm Terminal in Ferndale or the Fairgrounds in Detroit.	1
Alternative - No Action - modified - no expansion	The No Action Alternative with improvements is preferred, not expansion at existing terminals.	The Preferred Alternative provides a series of community improvements. Without some expansion of the Livernois-Junction Yard, per the Preferred Alternative, the railroads will make their own decisions regarding improvements to existing terminals and the cities of Detroit and Dearborn will make their own decisions in providing safe roads, managing truck traffic, reducing pollution, and improving the community cohesion. This is particularly evident when considering that none of the roads around the Livernois-Junction Yard are state roads.	5
Alternative - No Action - modified Alt 4	The Preferred Alternative is opposed due to its community impacts.	The Preferred Alternative brings a governance structure and community improvements (see Section 5) endorsed by the Southwest Detroit community, the Detroit City Council, the railroads, MDOT and the Federal Highway Administration.	3
Alternative - No Action - modified Alt 4	There is a need for community benefits and rail yard improvements.	The Preferred Alternative brings a governance structure and community improvements as well as rail yard improvements (see Section 5) endorsed by the Southwest Detroit community, the Detroit City Council, the railroads, MDOT and the Federal Highway Administration.	1
Alternative - No Action - modified Alt 2	There should be no rail yard expansion. Existing terminals should be improved and existing impacts should be mitigated.	Rail yard expansion is needed to meet the project purpose and need. The Preferred Alternative brings a governance structure and community improvements as well as rail yard improvements (see Section 5) endorsed by the Southwest Detroit community, the Detroit City Council, the railroads, MDOT and the Federal Highway Administration.	1

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Alternative - No Action - modify on site	Livernois-Junction Yard should not be expanded. Improvements should be made to reduce the existing impacts on the neighborhood.	Rail yard expansion is needed to meet the project purpose and need. The Preferred Alternative brings a governance structure and community improvements as well as rail yard improvements (see Section 5) endorsed by the Southwest Detroit community, the Detroit City Council, the railroads, MDOT and the Federal Highway Administration.	2
Alternative - No Action - modify on site	Livernois-Junction Yard should not be expanded. Improvements should be made within the current boundaries.	Rail yard expansion is needed to meet the project purpose and need. The Preferred Alternative brings a governance structure and community improvements as well as rail yard improvements (see Section 5) endorsed by the Southwest Detroit community, the Detroit City Council, the railroads, MDOT and the Federal Highway Administration.	1
Alternative - Other locations	It appears that other locations outside the City of Detroit were not considered.	Sections 3.2.1 and 3.2.2 consider these alternatives and find they do not meet the project's purpose and need.	1
Alternative - Other locations - Detroit	It appears that other areas within Detroit were not considered.	Both Greenfield and existing sites with rail access, including brownfields were extensively examined (Sections 3.2.1 and 3.2.2).	6
Alternative - Other locations - Moterm	Why wasn't CN's facility in Port Huron considered?	The analysis was limited to Wayne County and adjacent areas.	3
Alternative - Other locations - outside SE Michigan	Why not consider locations in other areas of Michigan?	The purpose and need of the project addresses the needs of Southeast Michigan around Wayne County.	2
Alternative - Other locations - Willow Run	Additional government review is needed if Willow Run is used.	The Preferred Alternative allows the intermodal activity at the Willow Run Terminal to be transferred to the Livernois-Junction Yard.	1
Alternative - Preferred	Why is MDOT unable to state a preferred alternative?	National Environmental Policy Act (NEPA) implementing regulations allow a Preferred Alternative to be identified at the Public Hearing, or after all comments on the DEIS have been received and considered. MDOT anticipated many comments on the DEIS and considered them in the decision-making process before identifying the Preferred Alternative.	1
Alternative - Preferred - CN	CN's position makes Alternative 4 the Preferred Alternative by default.	The Preferred Alternative is a modification of Alternative 4, which does not include expansion of the CN/Moterm Terminal.	2
Alternative - Preferred - CSX	You're continuing with this process when you clearly admit that CSX has refused to sign the Memorandum of Understanding (MOU) and CN does not intend to relocate to Livernois-Junction Yard.	Each Class I railroad was afforded the opportunity to participate. CSX deemed more information was needed before it signed an MOU which was included in this FEIS. Nonetheless, this FEIS includes the next version of MOU which is called the Pre-Development Plan Agreement (Appendix F). It has been signed by all four railroads.	1

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Alternative - Preferred - site plans	Will there be a need to alter the site plans to meet the requirements of the railroads?	Yes. The alterations are included as part of the Preferred Alternative.	1
Alternative - public ownership	I support public ownership of transportation infrastructure.	Comment acknowledged. The anticipated ownership structure is outlined in the Pre-Development Plan Agreement found in Appendix F.	1
Alternative - RR regulation	Public money should not be spent to make the railroads provide community improvement.	Without some expansion of the Livernois-Junction Yard, per the Preferred Alternative, the railroads will make their own decisions regarding improvements to existing terminals and the cities of Detroit and Dearborn will make their own decisions regarding safe roads, managing truck traffic, reducing pollution, and improving the community. The Preferred Alternative provides a series of community improvements.	2
Alternative - RR regulation actions	The condition at the Junction Yard is simply untenable. The roads have deteriorated, the viaducts are unkempt, trucks are out of control on every neighborhood street and the sewers back-up.	The Preferred Alternative provides a mechanism to pave the yards, manage truck traffic, and reduce windblown sediment that clogs sewers.	1
Alternative - RR regulation off site	The users of the intermodal facilities should pay to maintain them.	Independent of partnership with the government, the actions of the railroads are based on business decisions and a series of federal laws that often supersede state regulation. The state has virtually no regulatory authority and the railroads are under no obligation to take action outside their business interests, while operating consistently with the guiding federal regulations.	2
Alternative - transit	A light rail transit alternative should be included.	Improved transit does not improve intermodal freight movement or address the project purpose and need. Nonetheless, the Preferred Alternative accommodates AMTRAK and commuter rail operations through the Livernois-Junction Yard.	1
Alternative - transit - Lonyo	The DEIS fails to consider options such as improving public transit and non-motorized transportation.	The Preferred Alternative considers local transit and non-motorized facilities and proposals (Section 4.2.2 and 4.2.3). It includes a buffer around the Livernois-Junction Yard plus improvements to Central Avenue that will improve pedestrian movements and their safety and that of auto drivers/occupants. Field counts on Lonyo in two different years during and after school hours showed no pedestrian activity and no bicycle use.	1
Alternative - two entry points	There must be only two points for truck ingress and egress at the Livernois-Junction Yard, one on the east one on the west with equal distribution between the two.	The Preferred Alternative will have two entry points on Livernois and two on Wyoming. The traffic distribution is shown in Table 4-9, with 2,410 trips (two-way total) on Wyoming and 1,390 on Livernois.	3

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Alternative - two entry points - modified Alternatives 3 and 4	With Alternatives 3 and 4, which gates serve the south part of the yard and which serve the north part of the yard?	Alternatives 3 and 4 had options with differences in use of Wyoming and Livernois. The Preferred Alternative has two yard entry points on Livernois and two on Wyoming. Gate 2 off Livernois serves the portion of the yard north of the east-west mainline tracks.	2
Alternative - use of tax dollars	Tax money should not go toward subsidizing the railroads and trucking companies.	MDOT evaluates needs statewide and makes decisions regarding the best use of its public investment funds to maintain and improve the transportation network. The DIFT Project is an opportunity to support the competitiveness of Southeast Michigan and the state. The financing package to implement the DIFT requires continuing negotiation, but its basic elements are contained in the Pre-Development Plan Agreement in Appendix F and includes investment by the federal government, the railroads, and MDOT. The railroads alone would not take such a broad approach to improving intermodal services and creating the associated positive effects without such a partnership.	2
Alternative - use of tax dollars - CN	If someone is going to offer you money, you'd probably accept the money. I think that's CN's position.	The Preferred Alternative does not affect the Moterm Terminal. CN has indicated it does not want to be subsidized in terms of terminal development, but does support track improvements that benefit all four railroads.	1
Alternative - use of tax dollars - livability	Tax dollars spent on transportation should be spent on things that make our community more livable.	The Preferred Alternative includes a series of community improvements through partnership among MDOT, the Federal Highway Administration and the railroads.	3
Alternative - use of tax dollars - other uses	There are better uses of public money.	MDOT's use of its financial resources is focused on transportation-related improvements.	3
Alternative - use of tax dollars - other uses/benefits	This money and funds for this study should have been directed towards addressing the concerns of the people.	The Preferred Alternative includes a series of community improvements through partnership among MDOT, the Federal Highway Administration and the railroads.	1
Alternative - use of tax dollars - source	What entity will fund the improvements?	MDOT evaluates needs statewide and makes decisions regarding the best use of its public investment funds to maintain and improve the transportation network. The DIFT Project is an opportunity to support the competitiveness of Southeast Michigan and the state. The financing package to implement the DIFT requires continuing negotiation, but its basic elements are contained in the Pre-Development Plan Agreement in Appendix F and includes funding by the federal government, the railroads, and MDOT.	3

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Alternative - use of tax dollars - state?	Is state funding required in order to get the federal funding? Would it necessarily require state funding?	The financing package to implement the DIFT will require continuing negotiation, but its basic elements are contained in the Pre-Development Plan Agreement included in Appendix F and includes funding by the federal government, the state of Michigan and the railroads.	1
Alternative - use of tax dollars	Why should the state fund projects for the railroads that come at the expense of the residents in the area?	MDOT evaluates needs statewide and makes decisions regarding the best use of its public investment funds to maintain and improve the transportation network. The DIFT Project is an opportunity to support the competitiveness of Southeast Michigan and the state. The railroads alone would not improve intermodal services and create the associated positive community effects without a partnership with government.	4
Alternative Evaluation	An environmental issues and risk assessment should cover existing conditions to identify causes of poor conditions so that development can occur without adding to the existing (air quality) burden.	The environmental analysis indicates few negative consequences are expected and, where encountered, will be minimized through mitigation. Additional information has been added on existing and future air quality conditions including particulate matter (Section 4.8.4).	1
Alternative Evaluation - AQ & health	The draft EIS fails to provide an overview of the current air quality and health status in the area.	The DEIS reported official MDEQ data available at the time the DEIS was published in May 2005. This FEIS includes updated information in Section 4.8. Additional information is available on MDEQ's website <a href="http://www.michigan.gov/deq">http://www.michigan.gov/deq</a> including the 2007 Annual Air Quality Report.	1
Alternative Evaluation - AQ data	More air quality data are needed.	The DEIS reported official MDEQ data available at the time the DEIS was published in May 2005. This FEIS carries updated information in Section 4.8. Additional information is available on MDEQ's website <a href="http://www.michigan.gov/deq">http://www.michigan.gov/deq</a> and particularly their 2007 Annual Air Quality Report.	2
Alternative Evaluation - AQ data Moterm	The air quality data from the Oak Park monitoring location does not include enough data and is not an accurate representation for the area being considered.	Oak Park is the nearest monitoring location to the CN/Moterm Terminal. As noted in Section 4.8, "Data are not collected at this monitor for NO <sub>x</sub> and PM <sub>10</sub> , so the data from the Linwood and Wyoming monitors are the best available."	1
Alternative Evaluation - existing AQ	The adjacent neighborhoods have already been identified by air quality officials as the most heavily polluted in Southeastern Michigan.	Comment acknowledged.	1
Alternative Evaluation - existing AQ - particulates	The DEIS didn't take into consideration that our community has one of the highest particulate matter levels in the country.	Section 4.8.4 states the area is non-attainment for PM <sub>2.5</sub> and specifically addresses PM <sub>2.5</sub> .	1



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Alternative Evaluation - graphics	A more complete graphic of community facilities is needed for the CP/Oak Terminal.	Figure 4-12c shows no community facilities because there are none, as noted at the bottom of the graphic.	1
Alternative Evaluation - graphics corrections	There are errors in the Community Facilities Map, Figure 4-10A.	Comment acknowledged. Corrections have been made. The new figure number is 4-12a.	1
Alternative Evaluation - infrastructure	MDOT, the City and Wayne County consistently ignored improvements in the infrastructure around the yard including streets, sewers, viaducts and the perimeter of the yard.	The proposed project is sponsored by MDOT and FHWA. The nearest facilities for which MDOT has responsibility are I-75, Michigan Avenue, and I-94. Other streets are under local jurisdiction as are sewers and viaducts. With the project MDOT will take over Central Avenue to construct its viaduct under the Livernois-Junction Yard.	2
Alternative Evaluation - old data	The DEIS used old data in regards to the community.	This FEIS has been changed where specific corrections have been noted by commenters and where continuous field review have indicated a need. It has also been updated where new data are available.	1
Alternative Evaluation - culturally unique	SW Detroit is a unique cultural destination.	Comment acknowledged.	1
Alternative Evaluation - growing area	From a policy perspective, taking homes and businesses from the only growing area of the City of Detroit does not make sense.	Expansion of intermodal facilities was considered in four locations (Alternative 2). The Preferred Alternative is a smaller version of the Alternative 4 as shown in the DEIS. Potential residential property acquisitions have been reduced from a maximum of 83 under Alternative 3 to 32 with the Preferred Alternative. And, business property acquisitions have been reduced from 64 to 29.	2
Alternative Evaluation - growing area - investment	The state has already invested substantially in Southwest Detroit and the DIFT can build on that investment.	MDOT believes the Preferred Alternative provides appropriate investment in SW Detroit to support ongoing redevelopment and growth.	2
Alternative Evaluation - transportation burden	Southwest Detroit is already disproportionately burdened by transportation and freight.	There has been no substantial change in the transportation infrastructure of Southwest Detroit in 40 years, following completion of the interstate system. In this context, the "disproportionate impact" has been present at least that long. Prior to the interstate system, industry grew around the railroads and housing developed for the industrial workers. Any negative consequences of this development have not been addressed largely because of lack of government resources.	3
Impacts	The DEIS analyzes environmental impacts at the state or regional level only and does not properly consider impacts at the local level.	Impacts at the local level are analyzed and explained throughout Section 4.	1
Impacts - 4(f)	There's a reasonable and prudent alternative to use of the State Fairgrounds.	The Preferred Alternative includes taking no action at the Fairgrounds/ CN Moterm Terminal.	1

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Impacts - AQ	It is not only important to not make sure air quality does not worsen, but take measures to ensure that it improves.	The air quality analysis uses EPA-approved methods and software and finds that, primarily through EPA's regulatory actions, air quality will substantially improve; however, the increase in intermodal activity brought about by the project will increase activity at the Livernois-Junction Yard with the Preferred Alternative. Section 4.8 covers air quality.	8
Impacts - AQ 2015	Emissions information for air toxics and PM <sub>2.5</sub> is only presented for 2004 and 2025. What about the intervening years?	Interim year (2015) data, based on the anticipated DIFT implementation schedule, are found in Section 4.8.	4
Impacts - AQ alternatives	Either Alternative 3 or 4 is essential in order to reduce the overall pollution.	The Preferred Alternative has positive effects on air pollution as described in Section 4.8.	1
Impacts - AQ burden	MDOT tries to downplay the significance of the increased air pollution by including a lengthy section on "EPA Measures to Improve Air Quality." MDOT provides modeled data showing reductions in national air pollution levels resulting from these measures.	As a "disclosure" document, it is important that the EIS present information regarding the relationship of future pollution to regulation versus the proposed project. The analysis also compares each Action Alternative's pollution relative to 2004, 2015 and 2030 No Action conditions.	1
Impacts - AQ burden - Alt. 4	The assumption under Alternative 4 that the increase in rail cars and trucks and the corresponding decrease in automobiles will in fact reduce pollution in the coming years is overstated and misleading.	The air quality analysis uses EPA-approved methods and software. The decrease in air pollution derives primarily from EPA's stricter emission standards. Also, some mobile-source polluting land uses would be relocated, which means that pollution would be removed from the area taken over by the terminal. The terminal activity replaces the existing land use, and in some cases is less intense from the standpoint of air emissions than the existing use.	1
Impacts - AQ burden - Alt. 4 reduction	PM10 and PM2.5 terminal burdens are much lower for Alternative 4 than 1 through 3. This appears to be reduced road and yard dust. Why is the reduction so much greater for Alternative 4 than Alternatives 2 and 3, which also would be paved at Livernois-Junction?	The difference is a function of the terminal layouts and traffic patterns assumed under each alternative. Alternative 4 is a more efficient layout. Note that some emission factors changed for this FEIS, as corrections were made to MOBILE6.2 and AP-42.	1
Impacts - AQ burden - comparison	The possibility that air pollution reductions will occur as a result of the EPA regulations is not a proper focus for the environmental assessment of the DIFT Project. Rather, the air quality analysis should be concerned with how each alternative measures up to the others, with or without the implementation of future EPA regulations.	The air quality analysis uses EPA-approved methods/software. As a "disclosure" document, the EIS presents information regarding the relationship of future pollution to regulation versus the proposed project. The analysis then compares each Action Alternative's pollution relative to 2004, 2015 and 2030 No Action conditions.	1

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Impacts - AQ burden - comparison to No Action	MDOT omits from its Environmental Justice analysis the key finding of its air quality assessment that each Action Alternative poses significant increases in pollution emissions over the No Action Alternative. Instead MDOT, again deceptively, compares levels of pollution under DIFT to today's conditions rather than rating each alternative against the No Action.	Action Alternative terminal burdens are compared to No Action Conditions are in Tables 4-22a and 4-23 for DEIS Practical Alternatives and 4-26a for the Preferred Alternative (Section 4.8.4). Preferred Alternative roadway pollutant burdens are compared to No Action in Table 4-27 and by road segment in Table 4-29. The Action Alternatives do not produce "significant increases in pollution emissions over the No Action Alternatives." See Table 4-30 for an overall comparison of the Preferred Alternative.	1
Impacts - AQ burden - conclusion	The conclusion at the local terminal area, pollution is expected to decrease is misleading. It derives solely from the change in National Diesel Emission Standards and not from the decision at hand.	Air emissions are compared to 2004 conditions, and 2015 and 2030 No Action conditions. Where emissions are lower with the project, it is because the additional terminal activity generates less pollution than the non-terminal uses that it replaces.	1
Impacts - AQ burden - EPA regulations	Consultants have claimed that trucks will emit less pollution as EPA regulations kick in.	The analysis uses the EPA-approved vehicle emission factors from MOBILE6.2, as is stated in Section 4.8.1.1. EPA says trucks will emit less pollution.	1
Impacts - AQ burden - EPA regulations - results	Increased air pollution that the DIFT would produce is hidden by factoring in air quality benefits associated with government regulations. Each Action Alternative increases total terminal pollution over the No Action Alternative.	Action Alternative terminal burdens are compared to No Action Conditions are in Tables 4-22a and 4-23 for DEIS Practical Alternatives and 4-26a for the Preferred Alternative (Section 4.8.4). Preferred Alternative roadway pollutant burdens are compared to No Action in Table 4-27 and by road segment in Table 4-29. The Action Alternatives do not produce "significant increases in pollution emissions over the No Action Alternatives." See Table 4-30 for an overall comparison of the Preferred Alternative.	1
Impacts - AQ burden - explanation	A thoughtful explanation of comparative impacts from the various different alternatives on the surrounding neighborhoods would have added value to the EIS.	Comment acknowledged.	1
Impacts - AQ burden - fleet replacement	The statement that the sulfur rule in 2007, applying to on-road and off-road engines, will make them substantially cleaner is misleading because a significant number of older engines will be in use for many years. MDOT must identify the assumptions made for fleet replacement rates for various kinds of diesel powered vehicles and equipment.	The fleet replacement assumptions were provided by SEMCOG, and are based on vehicle registration data for the region. These are approved by EPA and are built into the required EPA-approved analysis procedures.	1
Impacts - AQ burden - growth	The DEIS states that pollutant burdens in the terminal area will go up with the consolidation and composite alternatives at 80 to 130 percent. while the No Action Alternative shows less growth.	Comment acknowledged.	1

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Response Category	Generalized Comment	Response	#
Impacts - AQ burden - inputs	The DEIS states that the pollutant burden on the local roadway system around the terminal will be slightly less than the No Action Alternative. Unstated are the basic modeling assumptions about the types, amounts and emission profiles of vehicles traveling nearby for each alternative.	The types of vehicles are supplied by SEMCOG for vehicle registration data. Emission "profiles" are contained in the MOBILE6.2 emission factors generated with use of those vehicle fleet assumptions. This is so stated in Sections 4.8.1 and 4.8.2.	1
Impacts - AQ burden - local	The draft EIS acknowledges there will be an increased pollutant burden at Junction Yard, then fails to determine the resulting burden on the local immediate community.	The overall comparison of air pollution in the local community with and without the project is shown on Table 4-30.	1
Impacts - AQ burden - local measurement	While MDOT claims to have engaged in a "burden analysis," the draft EIS does not measure the burden of air pollution on anyone and instead simply estimates the total amount of various pollutants that the DIFT would produce.	The pollutant burden analysis is consistent with the DIFT <i>Air Quality Protocol</i> shown in Appendix E.	1
Impacts - AQ burden - Moterm	The CN Moterm PM10 is going to double when this comes through. That's not true of other areas; none of them are going double like Moterm would.	The Preferred Alternative does not affect the Moterm Terminal. CN has indicated it will not expand into the Fairgrounds.	1
Impacts - AQ burden - new traffic	If satellite businesses are coming in, you have to include the burden that those satellite businesses will bring to the community.	The terminal area includes the previously-defined area plus a "zone of influence" as defined in Section 3.4.2. The three terminal areas range in size from 22 to 35 square miles and contain from 140,000 to 165,000 people, according to the 2000 Census. Therefore, as an air pollution generator is relocated from the air quality impact analysis area, pollution goes down. The businesses are expected to be relocated to the much larger terminal area. Pollution associated with the businesses at new locations could go up or down. Any estimate would be speculative. Background traffic is increased for the analysis at one percent a year. That increase allows for the relocations and infill of new businesses.	1

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Response Category	Generalized Comment	Response	#
Impacts - AQ burden - new traffic - two areas	The fact that relocated businesses would stay in the area contradicts the assumption of the air quality analysis, which says that the trucks would be moved out of the area.	The terminal area includes the previously-defined area plus a "zone of influence" as defined in Section 3.4.2. The three terminal areas range in size from 22 to 35 square miles and contain from 140,000 to 165,000 people, according to the 2000 Census. Therefore, as an air pollution generator is relocated from the air quality impact analysis area, pollution goes down. The businesses are expected to be relocated to the much larger terminal area. Pollution associated with the businesses at new locations could go up or down. Any estimate would be speculative. Background traffic is increased for the analysis at one percent a year. That increase allows for the relocations and infill of new businesses.	3
Impacts - AQ burden - paving	The DEIS attributes air quality improvements to the Action Alternatives. Paving the terminal areas could improve air quality without expanding the footprint of the terminal.	The statement is true, but there is every indication the rail yards would not be paved without government involvement, i.e., the DIFT Project.	1
Impacts - AQ burden - relative emissions	It is not enough to roughly estimate relative emissions of the various alternatives.	The <i>Air Quality Protocol</i> in Appendix E guided the analysis. It was developed by MDOT in conjunction with FHWA, US EPA, MDEQ and SEMCOG.	1
Impacts - AQ burden - support	The DEIS concludes, without support, that all the air quality issues will be resolved by the implementation of the Clean Air Interstate rules and USEPA's rules requiring the upgrading of diesel engines. This analysis is flawed for multiple reasons.	The Air Quality Impact Technical Report provides an extensive amount of data used to generate the link-by-link roadway pollutant burden forecasts (using EPA emission factors), and all elements of the terminal activity: visitor/employee traffic; truck activity on the rail yard related to container delivery and pickup; container handling (moving containers between delivery points and trains); locomotive idling and movement on the yard; fugitive dust from paved and unpaved yard areas; vehicular travel on sites of businesses to be acquired; vehicular travel on streets that would close with development (John Kronk and a section of Lonyo); and, fugitive dust from business sites and streets that would be closed. Canadian trucks are produced in the same factories and generally meet the same emission standards as US trucks. No data are provided to indicate intermodal trucks are different than other trucks. The analysis does account for trucks traveling to and from the terminals as well as the truck trip reduction through diversion to rail.	1

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Response Category	Generalized Comment	Response	#
Impacts - AQ burden - truck increase	It is unclear why the DEIS predicts the public roadway burden for diesel PM should go down for Alternatives 3 & 4 compared with No Action in 2025, when the number of trucks appears to increase by at least four times.	In 2030, the number of daily trucks associated with the Preferred Alternative, compared to the No Action Condition, goes up by about 700 (Table 1-4). The number of trucks does not go up four times from No Action to any Action Alternative. Information on traffic patterns to be experienced under each alternative is included in the traffic/gate descriptions in Section 4.1 and in Section 4.8, which covers the local roadway burden. This information has been expanded upon in this FEIS.	1
Impacts - AQ burden analysis	The burden analysis is flawed. It is based on trends derived from national standards that are not reflective of and are different from local trends.	The burden analysis is not based on trends. The roadway burden emission factors assume SEMCOG's fleet vehicle mix, which is approved by EPA, together with traffic volumes and speeds estimated for this project. The terminal pollutant burden analysis likewise used EPA guidelines and emission factors, together with site layouts specific to each terminal and alternative.	1
Impacts - AQ burden HAPS	A quantitative air analysis should include all hazardous air pollutants (HAPS) found in diesel exhaust.	Mobile source air toxics (MSATs) are analyzed consistent with joint U.S. EPA and FHWA guidance in Section 4.8.	1
Impacts - AQ clarification NOx	On Page 1-42 and 4-116, the wording is confusing with respect to Alternative 2's NOx emissions.	The language has been clarified.	1
Impacts - AQ clarification PM2.5	The Alternative 2 narrative says PM10 would be reduced in 2025 relative to No Action, but PM2.5 would be virtually unchanged. The table shows PM2.5 would be reduced 7% over No Action. Does the narrative only pertain to the SW Detroit/E. Dearborn site?	The narrative does not pertain only to the Southwest Detroit/East Dearborn site. The language has been clarified.	1
Impacts - AQ comparative impacts	The burden of proof rests with MDOT to describe the comparative impacts of the proposals versus the status quo. Well-tested research methodologies and air dispersion models are available that can be tailored to show the effect that increased terminal pollution would have on the surrounding neighborhood.	The comparative air quality impacts were presented in the DEIS and its technical reports in the form of a terminal burden and roadway link-by-link comparison of pollutant burdens for 2004, and for Action and No Action conditions for 2015 and 2025. Tables 4-22a and 4-23 show terminal burdens with Table 4-26a covering the Preferred Alternative. Tables 4-27 and 4-29 show the burdens for the roadway links in the vicinity of the Livernois-Junction Yard. The future year has been extended to 2030. (Figure 4-44 shows the links.)	1
Impacts - AQ - comparison do nothing	The real question is how much the DIFT would increase air pollution over doing nothing.	Terminal and roadway burden analyses (Section 4.8.7) compare the Preferred Alternative to existing (2004) conditions and No Action in 2015 and 2030, covering each of the many activities that occur. All activity is summarized in Table 4-30.	1



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Impacts - AQ - comparisons	The DEIS failed to take a hard look at a number of impacts, including air quality. The Action Alternatives would make air quality significantly worse.	Terminal and roadway burden analyses (Section 4.8.7) compare the Preferred Alternative to existing (2004) conditions and No Action in 2015 and 2030, covering each of the many activities that occur. All activity is summarized in Table 4-30.	1
Impacts - AQ - conformity	The Livernois-Junction Yard area in Wayne County is near the Dearborn PM2.5 monitoring site and registers some of the highest readings in the eastern US. The additional activity from this project will affect the State's ability to attain the PM2.5 standard.	The DIFT Project has been found to be in conformity (see Section 4.8.7) for PM2.5.	1
Impacts - AQ - conformity - Dearborn monitor	With the number of lifts increasing up to four times from current levels and trucks increasing up to six times the current levels, there is concern associated with the impacts at the Dearborn monitor which is already heavily burdened with respect to PM2.5.	The cited increases in lifts and trucks are wrong. The maximum percent increases under the most expansive Action Alternative was 132 % in lifts (Figure 4-1) and 142 % in trucks (Alternative 3, compare totals in Tables 4-1c and 4-3). The Preferred Alternative will have an increase in lifts and trucks of 57 percent more than the No Action Alternative (Figure 4-10). The "net new" number of trucks with the Preferred Alternative, compared to the No Action Alternative, is about 700 at the Livernois Junction Yard (Table 1-4), as the project will relocate a number of heavy truck generators.	1
Impacts - AQ - conformity - general	This project will need to address the general conformity requirements, if applicable.	General conformity was found not to apply.	1
Impacts - AQ - conformity - timing	The DIFT air quality impacts should be incorporated into the SEMCOG modeling process now as a part of the decision-making process rather than after the final alternative is identified.	The conformity procedures used for the DIFT Project are consistent with guiding laws and regulations.	2
Impacts - AQ - conformity - traffic congestion	Maps in the DEIS show predicted traffic volumes exceeding a 1.00 volume to capacity ratio in several locations near the Dearborn PM2.5 monitor. That would suggest substantial congestion will occur at a number of intersections.	The DIFT traffic analysis presented in Section 4.1 demonstrates that traffic congestion is not caused by DIFT activities. No intersections are forecast to experience congestion with the Preferred Alternative, as defined as a Level of Service of D or worse.	1
Impacts - AQ - conformity determination	Detroit's current air quality non-attainment status should be considered in the DEIS and the selection of a preferred alternative.	The project has found to be in conformity with all NAAQS by SEMCOG in conjunction with FHWA. See Section 4.8.7.	2
Impacts - AQ - conformity - standards	The region faces even stricter PM2.5 standards within several years.	The DIFT analysis is based on current laws and regulations. If those change prior to project approval, the analysis will change. Project conformity is tested against the 15 µg/m <sup>3</sup> annual and 65 µg/m <sup>3</sup> 24-hour standards.	1
Impacts - AQ - correction	There is a typographical error on page 4-101.	This change has been made.	3

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Impacts - AQ - Dearborn monitor values	Regarding the spike in 2003 PM10 values at the Dearborn monitor, there evidently were false readings because the monitor was only 300 feet from the construction site of the new Salina School.	Spikes were noted by MDEQ in their 2006 Air Quality Report as resulting from construction near the monitor. Adjustments were made, as noted in Section 4.8.4.3.	1
Impacts - AQ - dust - existing	The Livernois-Junction Yard should be paved.	The railroads have stated they do not intend to pave the yards in the absence of government participation, such as the DIFT Project.	2
Impacts - AQ - dust - importance	The DEIS states that road dust represents a significant part of the total PM emissions. Focusing on road dust overlooks more significant and cost-effective mitigation options.	A drive through of the neighborhood, and comments received at public meetings, demonstrate that dust is prevalent in the neighborhoods; it is both a nuisance and an air quality concern. Work by the Lake Michigan Air Directors Consortium reported on in a draft "Weight of Evidence" document prepared by SEMCOG in support of PM2.5 analysis indicates that dust control related to PM is an issue that may need further attention. Table 4-26a (Preferred Alternative) reflects the assumption that the terminals will be paved as part of the project's design. The methodology used in calculating dust is from EPA's AP-42. The assumptions and calculations are all shown in Appendix A of the <i>Air Quality Impact Analysis Technical Report</i> .	1
Impacts - AQ - dust - paving Livernois Yard	MDOT states that paving the Livernois Yard could reduce soil and dust, it does not show by how much.	Pollution related to dust (PM10) will be reduced by over 60 % under the Preferred Alternative, compared to No Action at the Livernois-Junction Yard. The assumptions and calculations are shown in Appendix A of the <i>Air Quality Impact Analysis Technical Report</i> .	1
Impacts - AQ - general	The DIFT will increase pollution and adversely impact air quality.	Air quality has improved dramatically in the past as more stringent regulations on automotive vehicles and industries have been implemented. Lead pollution has plummeted. Ozone values are down considerably. New EPA controls on diesel engines and diesel fuels will have an additional significant positive effect. See Section 4.8.2.1.	5
Impacts - AQ - health	The DEIS should include additional analysis of public health impacts.	Possible health effects of PM2.5 and air toxics are noted in Section 4.8.3. The reasons why no additional analysis of health effects will be done are stated in that section.	25
Impacts - AQ - health - asthma	The impact of the DIFT on asthma should be considered.	Substantially lower future PM2.5 and diesel particulate matter (DPM) are forecast as EPA increasingly regulates diesel engines and fuel. Also, the Preferred Alternative directs trucks away from neighborhoods and onto streets better suited to truck traffic.	1

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Impacts - AQ - health - asthma - 5000 trucks	Will the DIFT contribute to an increased incidence of asthma?	With EPA-mandated PM2.5 and fuel controls, PM2.5 levels by 2030 will be approximately 37% of what they were in 2004 at the Livernois-Junction Yard, considering the terminal and local roadway network combined.	1
Impacts - AQ - health - asthma today	We have the second highest asthma rate in the country.	According to <i>Epidemiology in Michigan 2004 Surveillance Report</i> (Michigan Department of Human Health), "Michigan needs to improve its ability to collect information on the number of people with asthma in all Michigan populations. Information on the number of people with asthma is not available for all age groups (particularly young children) or subpopulations (for example, Arab/Chaldean or Hispanic populations). Data are also not available at the level of geographic detail that would aid in planning and conducting asthma interventions (e.g., county, city or school district levels).	1
Impacts - AQ - health - background	A large body of scientific literature links exposure to traffic and diesel exhaust to health problems.	Possible health effects of PM2.5 and air toxics are noted in Section 4.8.3.	4
Impacts - AQ - health - compensation	Residents should be compensated for health care needed by those affected by pollutants and carcinogens due to the freight yards.	There will be no air quality impacts requiring compensation.	2
Impacts - AQ - health - compensation - additional analysis	DHWP requests a cost benefit analysis to address the impact of cost for additional medical care for the insured and uninsured (and time lost from work).	Possible health effects of PM2.5 and air toxics are noted in Section 4.8.3. The reasons why no additional analysis of health effects will be done are stated in that section.	1
Impacts - AQ - health - conclusions	Additional analysis is needed to support the impacts on human health that are stated in the DEIS.	Air quality impacts were an important consideration in developing the project alternatives and in decisions related to routing truck traffic in the Preferred Alternative. Possible health effects of PM2.5 and air toxics are noted in Section 4.8.3 of this FEIS. The reasons why no additional analysis of health effects will be done are stated in that section.	3
Impacts - AQ - health - correction	There is inconsistency between a statement in the DEIS and the EPA's website in terms of health effects of air toxics.	The paraphrasing of the EPA's language has been corrected in this FEIS.	1

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Impacts - AQ - health - DATI	The Detroit Air Toxics Initiative (DATI) was ignored in the DEIS.	The <i>Detroit Air Toxics Initiative Report</i> (DATI) was issued after the DEIS was printed for public availability (final report dated November 2005 and available on the Web at <a href="http://www.michigan.gov/documents/DATI_-_COMPLETE_FINAL_REPORT_11-9-05_142053_7.pdf">http://www.michigan.gov/documents/DATI_-_COMPLETE_FINAL_REPORT_11-9-05_142053_7.pdf</a> ). The DATI project's goals are to "characterize the levels of air toxics in the Detroit area, to assess the health risks associated with those levels, and to work with a broadly representative stakeholder group to develop reports on the findings and to recommend risk reduction activities." The report is summarized in Section 4.8.7.3.	1
Impacts - AQ - health - dispersion	There needs to be a health impact study and analysis of dispersion of the emissions.	Dispersion of air pollutants other than CO is not required. Possible health effects of PM <sub>2.5</sub> and air toxics are noted in Section 4.8.7.3. The reasons why no additional analysis of health effects will be done are stated in that section.	1
Impacts - AQ - health - effects	The burden analysis does not provide exposure data important to understanding health impacts.	Possible health effects of PM <sub>2.5</sub> and air toxics are noted in Section 4.8.7.3. The reasons why no additional analysis of health effects will be done are stated in that section.	1
Impacts - AQ - health - EPA study	There should be a review and inclusion of USEPA's study <i>Health Effects of Environmental Exposure Among Children Living in Detroit</i> .	The cited study is described on EPA's Web site - <a href="http://www.epa.gov/dears/studies.htm">www.epa.gov/dears/studies.htm</a> . Quoting from the "Background" section of the Web site, "Previous research has shown that concentrations of PM <sub>2.5</sub> mass concentrations measured at community sites are often a reasonable surrogate for personal PM mass concentration exposures. Presently, <u>it is not known if specific components of PM and related air toxic pollutants from specific ambient sources observe the same relationship.</u> " The studies include: the Detroit Exposure and Aerosol Research study (DEARS); the Detroit Children's Health Study (DCHS); the Detroit Cardiovascular Health Study; and, the Detroit PM Toxicology Study.	1

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Impacts - AQ - health - established limits	There should be regular studies of the impacts of the DIFT on upper respiratory disease with established pollution limits.	Establishing pollution limits to protect the public health and welfare is the purview of EPA under the Clean Air Act. In December 2006, EPA reduced the 24-hour standard for PM2.5; non-attainment designations have been in place since 2004. A series of studies is underway in Detroit to determine whether established monitoring stations give results for PM2.5 that provide accurate information about pollution levels in the surrounding community. The network of existing pollution monitors in Southwest Detroit is the densest of any area in Michigan.	1
Impacts - AQ - health - existing	The current levels of air pollution in Detroit are already having a negative impact on the health of local residents.	Concern with levels of air pollution in Southwest Detroit has spurred studies with researchers and interested parties from EPA, the Michigan Department of Environmental Quality, the University of Michigan, the Detroit Department of Environmental Affairs, and the Detroit Public Schools. EPA will be investigating how ambient source impact information obtained from community, residential and potentially the personal level can be used in linked toxicological, epidemiological and health effect studies. See <a href="http://www.epa.gov/dears/studies.htm">www.epa.gov/dears/studies.htm</a> .	1
Impacts - AQ - health - exposure	We really have no knowledge on how pollutants might affect people who live around the rail yard facilities.	Possible health effects of PM2.5 and air toxics are noted in Section 4.8.7.3. The reasons why no additional analysis of health effects will be done are stated in that section.	1
Impacts - AQ - health - law	Even though there is no National Air Quality Standard for air toxics, further study and quantification of health impacts related to air toxics is needed.	Possible health effects of PM2.5 and air toxics are noted in Section 4.8.7.3. The reasons why no additional analysis of health effects will be done are stated in that section.	12
Impacts - AQ - health - legal	Appropriate and useful methods are available to assess potential health impacts associated with the DIFT.	FHWA guidance issued February 13, 2006 finds the science still lacking to accurately predict particulate concentrations.	3
Impacts - AQ - health - Moterm	There will be an increase in leukemia, and various other cancers and asthma in the area of the Moterm terminal.	The Preferred Alternative does not affect the Moterm Terminal. CN has indicated it will not expand into the Fairgrounds.	1
Impacts - AQ - health - risks	There is no mention of health risks in the DEIS.	A health risk analysis is not required and has not been done for the reasons cited in Section 4.8.7.3.	1
Impacts - AQ - health - risks difficulty	There must be a way to estimate health risks posed by the DIFT.	A health risk analysis is not required and has not been done for the reasons cited in Section 4.8.7.3.	2

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - AQ - health - SW vs. region	The potential environmental/health impacts as a result of the DIFT will negatively impact Southwest Detroit, while improving conditions for the region.	Table 4-31 shows air pollution burdens on the terminals and local roadway systems will substantially improve from today's conditions in all locations as more stringent regulation of diesel vehicles and fuel takes effect. With the Preferred Alternative, more roadway link burdens improve than not, and the terminal burden is substantially reduced.	1
Impacts - AQ - mercury	Does the air get cleaner with double the number of trucks because of the recent relaxation of the mercury laws associated with coal?	The analysis shows pollution from trucks will be greatly reduced in the future. Regulation of power plants that burn coal with respect to mercury is a separate topic, unrelated to trucks.	1
Impacts - AQ - mobile source measurements	It should be noted that in the DEIS, not a single air quality or emissions measurement has been collected. Rather, all analysis is based on modeling.	Southern Wayne County has the most comprehensive set of monitoring stations in Michigan. The monitoring data from these stations is reported in Sections 4.8.2. Modeling is used by SEMCOG in its attainment determinations for future conditions, and MDOT has modeled CO hotspots and used the MOBILE6.2 emission factor model to determine pollutant burdens.	1
Impacts - AQ - mobile source measurements clarified	Language in the DEIS regarding mobile source emissions indicate that the authors are unfamiliar with mobile source inventory methodologies.	The reference to tailpipe emissions has been changed.	1
Impacts - AQ - noise	The DEIS analysis of air quality, noise and vibrations and their related potential health impact should be strengthened.	The analysis meets all applicable state and federal regulations and guidelines.	1
Impacts - AQ - old trucks	Older trucks that contribute more to air pollution than trucks made in 2007 or later, could remain on the road and in the fleet mix for many years. Were the correct assumptions on fleet mix used in the air quality analysis?	The air quality analysis uses the vehicle age distribution from Michigan vehicle registration data. That data set is SEMCOG's, as approved by EPA. There is no basis for using another data set, nor any known alternative data set.	5
Impacts - AQ - old trucks mitigation	Will MDOT require trucks used in the DIFT be equipped with engines fitting the 2007 standards?	While conditions are stipulated in the Pre-Development Plan Agreement that require actions on the part of the railroads (because the government is providing benefits to the railroads), such requirements will not extend to trucks hauling containers to and from the terminal. Idling restrictions while in the terminals will be put in place with the DIFT, to the extent feasible.	1
Impacts - AQ - old trucks smell	How will EPA regulations and standards be enforced, as they relate to trucking firms?	Fuel with a high sulfur content will not be available in the future. Over time, newer, cleaner trucks will replace older trucks. "Enforcement" comes in the form of testing of new vehicles when they are manufactured.	1



## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - AQ - PM	The air is getting dirtier every day.	Dirty windshields normally result from deposition of particulate matter (PM). Figure 4-31 shows trends in particulate emission factors and Figures 4-35 and 4-36 show the trends for particulate matter at the Wyoming monitoring station, which is nearest to the Livernois-Junction Yard, the area of the Preferred Alternative. On a localized basis, dust from trucks coming off unpaved areas is a local source of PM. The Preferred Alternative will pave the Livernois-Junction Yard.	1
Impacts - AQ - PM 2.5 analysis	The increase in traffic will exacerbate the existing high levels of particulate matter in the air.	Information on particulate matter from roads is presented in Tables 4-27 and 4-29 and is detailed by roadway link. Traffic volumes by roadway link near the terminals are shown in Table 4-28; those volumes are forecast to go down in the future on many of these links. Information on particulate matter on the intermodal terminals themselves are included in Tables 4-26a. Under the Preferred Alternative particulates are substantially reduced compared to the present and No Action Alternative (Table 4-31).	5
Impacts - AQ - PM 2.5 analysis ozone	The air quality burden analysis does not consider key pollutants of concern from DIFT trucks and trains (PM2.5 and ozone).	PM2.5 is addressed in the response to other comments. Regarding ozone, information has been provided on its precursors - volatile organic compounds (VOCs) and nitrogen oxides (NOx), as is customary in an air quality analysis of a transportation project. SEMCOG has evaluated the Preferred Alternative and found it to be in conformity with the State Implementation Plan for ozone.	1
Impacts - AQ - PM 2.5 existing	The existing PM 2.5 levels in Southwest Detroit and Dearborn are too high.	PM 2.5 readings in Dearborn (monitoring site 261630033 on Wyoming nearest to the Livernois-Junction Yard, the area of the Preferred Alternative) are the highest in the state, and so particulate matter is of obvious concern here, as elsewhere in Dearborn and Southwest Detroit. MDEQ and EPA have taken actions to reduce these levels.	4
Impacts - AQ - PM2.5 concentrations	Local assessment of PM2.5 ambient concentrations from the (Livernois-Junction) yard and traffic should be performed, including a breakout of diesel PM.	PM 2.5 and diesel particulate matter (DPM) concentration forecasts are not included. The tools to calculate concentrations are not yet reliable and concentration prediction is not required.	2
Impacts - AQ - PM2.5 concentrations - meetings	Local assessment of PM2.5 ambient concentrations from the (Livernois-Junction) yard and traffic should be performed, including a breakout of diesel PM. These were requested during meetings and conference calls with the AQD.	PM 2.5 concentration forecasts are not included. The tools to calculate concentrations are not yet reliable and concentration prediction is not required.	1

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - AQ - PM2.5 modeling	The EIS is misleading in stating that a dispersion modeling analysis is precluded by limitations such as lack of EPA standards or models.	PM 2.5 concentration forecasts are not included. The tools to calculate concentrations are not yet reliable and concentration prediction is not required.	1
Impacts - AQ - PM2.5 paving	Paving the terminal will not decrease the amount of PM2.5 emissions from diesel trucks and trains and should not be presented as a solution to PM2.5 emissions	Paving will reduce the nuisance of dust, which is predominantly PM10 (or larger-sized particles). PM2.5 is a fraction of the dust. PM/dust is very real problem in the area around the Livernois-Junction Yard, the area of the Preferred Alternative. It is not a substitute for other measures and has not been presented as such.	1
Impacts - AQ - point source	The DEIS fails to consider the air quality impacts of trucks traveling to and from the DIFT as they traverse roads from the freeway to the terminal.	Section 4.8.4, covering the terminal burden analysis, lists all vehicular movements on the yard that were considered. Section 4.8.5 and 4.8.7 (Preferred Alternative) covers the roadway burden analysis, and refers to Figures 4-44 to 4-47, which show the roadway networks where traffic to and from the terminals is considered.	2
Impacts - AQ - standards	Have the trucking firms that do not switch to cleaner diesel engines been considered in the air quality analysis?	The fleet replacement assumptions were provided by SEMCOG, and are based on vehicle registration data for the region. These are approved by EPA and are built into the required EPA-approved analysis procedures.	1
Impacts - AQ - standards delay	The air quality analysis is based on an optimal situation that government standards and fuel changes will occur. Scenarios should be considered in which the optimal situation doesn't happen.	EPA's standards were delayed in the courts for years, but have now gone into effect. According to EPA, if standards change, they will become more strict. EPA emission factors in the future assume a conventional fleet mix. This is not "optimal" as it is likely the future will bring hybrids and vehicles that use less fuel.	3
Impacts - AQ - standards EJ	MDOT in no way holds responsibility for federal fuel and engine standards and so should not include air quality benefits attributable to those measures in its Environmental Justice analysis of DIFT.	Michigan/MDOT is subject to compliance with EPA regulations. The EIS must take into account regulations that are in place at the time the document is written.	1
Impacts - AQ - standards results	Because of increased diesel truck traffic from the DIFT, residents in Southwest Detroit and south Dearborn would realize almost no air quality benefit as a result of the regulations requiring cleaner truck engines.	Information on particulate matter from roads is presented in Tables 4-27 and 4-29 and is detailed by roadway link. Traffic volumes by roadway link near the terminals are shown in Table 4-28; those volumes are forecast to go down in the future on many of these links. Information on particulate matter on the intermodal terminals themselves are included in Tables 4-26a. Under the Preferred Alternative, particulates are forecast to be substantially reduced, compared to present (2004) conditions and No Action Alternative (Table 4-26a).	1

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - AQ - toxics analogy	The statement comparing estimates of aggregated air toxics from residential home heating to air toxics roadway burdens is not particularly fitting or accurate.	The example is illustrative, allowing a lay person to have some understanding of the magnitude of other air toxics in the environment.	1
Impacts - AQ - toxics as carcinogens	MDOT does not acknowledge that the particular air toxics in diesel exhaust are listed by the EPA as known or probable human carcinogens.	In this FEIS the discussion of air toxics has been expanded, and carcinogenicity is noted.	1
Impacts - AQ - toxics conclusions	The DEIS lacks conclusions related to the air toxics burden estimates.	This FEIS expands on the discussion of the differences between No Action and the Preferred Alternative and summarizes these in a new Table 4-26a.	2
Impacts - AQ - toxics evaluation	Without dispersion modeling and risk assessment, it is not possible to effectively use the air toxics information presented in the DEIS.	As there are no air toxic standards, the burden analysis in the DEIS compared the alternatives to one another, rather than to a standard. The data in Table 4-31 shows the relationship between the No Action Alternative and the Preferred Alternative.	1
Impacts - AQ - toxics results	Why are toxic emissions so much lower in the No Action Alternative? Is it assumed there will be a lot less container handling under No Action?	If the comment refers to air toxics at the Livernois-Junction Yard, the answer is "yes," there would be less on-terminal activity with the Preferred Alternative than No Action as the Preferred Alternative's terminal layout will lead to more efficient vehicle activity.	1
Impacts - benefits	The railroad yards bounded by Livernois, Kronk and Wyoming should be used as part of the DIFT, it will only improve these areas.	Comment acknowledged.	1
Impacts - benefits - ACCESS	I can't understand how the DIFT Project would negatively affect the south end of Dearborn and wonder if the members of ACCESS are really being told the real benefits to the project.	ACCESS has been involved in the project and is aware of the benefits and impacts cited by MDOT.	1
Impacts - benefits - AQ	Intermodal improves air quality by creating shorter truck trips through the increased use of rail.	Comment acknowledged.	3
Impacts - benefits - businesses	The DIFT will not benefit businesses.	There is potential for improved business and related jobs in many sectors of the economy as a result of implementing an Action Alternative. These jobs are forecast to pay average annual compensation of \$40,000 per year per Section 4.5.2.	3
Impacts - benefits - Dearborn	The direct economic benefit to the City of Dearborn would be minimal.	This comment is contrary to the statements in the official Dearborn Master Plan per Section 4.6.1. There is potential for improved business and related jobs in many sectors of the economy as a result of implementing an Action Alternative.	2
Impacts - benefits - jobs	It is important to note that the DIFT will bring 3,000+ jobs to the area.	Comment acknowledged.	1

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - benefits - local	There are no benefits to my community from the project.	The community improvement plan provides for specific benefits to the local Southwest Detroit/East Dearborn community, beyond those accruing from the general regional economic stimulus and reduced regional truck activity.	2
Impacts - benefits - local improvements	Who wants the project and how does it benefit those parties? How does the public benefit?	MDOT, the Federal Highway Administration, the railroads, the City Council of Detroit and members of the Southwest Detroit community in a group known as the Gateway Community Development Collaborative, among others, support the project. Additionally, the measures in Section 5 include improvements to benefit the area immediately around the Livernois-Junction Yard, which is the area of the Preferred Alternative.	1
Impacts - benefits - local mitigation	What are the proposed benefits to the area around the DIFT?	The measures in Section 5 of this FEIS include improvements to benefit the area immediately around the Livernois-Junction Yard, which is the area of the Preferred Alternative.	3
Impacts - benefits - opinion	The cost of all alternatives outweighs the benefits to the community.	Comment acknowledged.	1
Impacts - benefits - Southwest Detroit	The DEIS creates the impression that the presence of the DIFT in Southwest Detroit is desirable, beneficial and has no adverse impact. The DEIS cannot omit facts to support the action and reject those that do not.	The EIS addresses all impacts, consistent with state and federal regulations and laws. The benefits of the project are also addressed.	1
Impacts - benefits - stimulus	The DIFT will stimulate economic development in Southwest Detroit.	The project will have positive primary and secondary economic effects as presented in Section 4.5.	2
Impacts - business - benefits	Is there any improvement in the situation for the businesses that back up to the railroad lines (at the Livernois-Junction Yard)?	Rear borders would change in most cases. Rail access will be maintained to businesses that have it today.	1
Impacts - business impacts	Traffic congestion on Wyoming may have implications for local businesses.	Traffic congestion is not forecast to occur due to the Preferred Alternative.	2
Impacts - business impacts - Central	I am concerned about my property at 3774 Central.	This property will not be relocated by the Preferred Alternative.	1
Impacts - business impacts - Lonyo	Closing Lonyo and making travel more circuitous around the yard could hurt businesses in Southwest Detroit and South Dearborn.	The travel time of a motorist with traveling on Lonyo would increase about two minutes when Lonyo is closed. However, the Central underpass means that no trains will be encountered by roadway traffic. Today, stopping at the mainline tracks adjacent to Kronk is common as trains pass frequently and there will be more trains in the future.	1

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - business impacts - Oak	I'm in the CP Oak area and I'm concerned about my property. You've got me locked in on three sides. I don't like it, and I want somebody to take me out of there.	The DIFT Project will have no effect on the CP/Oak terminal's boundaries. The Preferred Alternative will shift intermodal operations now at the CP/Oak terminal to the Livernois-Junction yard. The Oak yard, owned by CSX railroad, would be used for other rail purposes.	1
Impacts - business impacts - tool and die	We run a tool and die business with very fine machine tolerances. The increase of intermodal traffic and those trains cause a problem for my business. Is there any relief for businesses that are on these lines coming in?	The Livernois-Junction Yard has had rail use for over 100 years in varying intensities. The proposed changes are consistent with other changes over time and are in keeping with the yard's use by railroads.	1
Impacts - business - Michigan	In terms of a gate at Wyoming, will there be any impact on the southwest corner of Michigan Avenue and Wyoming?	No.	1
Impacts - business site	Within that acreage of Alternative 4 are you going to try to accommodate appropriate businesses? Is there going to be room for any kind of industry related to the development?	The terminal at the Livernois-Junction Yard under the Preferred Alternative will not include non-railroad-owned businesses. The economic analysis indicates the DIFT will stimulate business/economic development that is forecast to occur in the broad area (35 square miles) around the Livernois-Junction Yard.	2
Impacts - community cohesion	The proposed DIFT would destroy the cohesion of one of the few richly diverse communities in the state of Michigan.	The Preferred Alternative will close Lonyo, but reduce truck traffic on neighborhood streets. It would have a security wall around most of the terminal, and a landscaped buffer in the north where residential activity is nearest to the terminal today and in the future. 29 businesses and residents in 32 residences would be relocated by the Preferred Alternative.	1
Impacts - community cohesion - Oak	Section 4.2 "Social Impacts/Community Cohesion" needs to provide more detail for the CP/Oak community.	More detail is not needed as the Preferred Alternative does not involve expansion of the CP/Oak Terminal	1
Impacts - compare other locations	Has this type of expansion occurred in any other parts of the country or the state, and if so, what was the impact on that community?	Tours of other intermodal sites in Chicago were provided to community leaders, and information is provided in DIFT Technical Report No. 3, (October 2001) Figures 4-3 to 4-6. Chicago intermodal terminals positively co-exist with the surrounding community. The Canadian Pacific Triple Crown intermodal terminal in Melvindale also co-exists with its neighboring community. Refer to Figure 4-71 of this FEIS.	1
Impacts - construction	The DIFT terminal should not be under construction at the same time as the Fort Avenue bridge.	The Fort Street Bridge construction is scheduled to be completed before the DIFT Project's construction is scheduled to begin.	1

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - cultural resources	Historic structures within the footprints of any DIFT alternative should be relocated and saved as opposed to documented and demolished.	See Section 6. The only historic site that would experience an adverse effect is the former Michigan Box Company/Spranger Wire Wheel Corporation at 7175 Clayton Street, which would be demolished. An updated Memorandum of Agreement (Appendix C) has determined that the site will be properly recorded before it is demolished. Moving the building is not practical.	1
Impacts - cultural resources - Fairgrounds	Was the historical value of the State Fairgrounds considered?	Yes. See Section 6. The Fairgrounds will not be affected by the Preferred Alternative.	1
Impacts - cumulative	The study failed to consider key potential adverse impacts on the affected communities such as indirect and cumulative effects.	The positive and negative indirect and cumulative effects are cited at the end of Section 4.17.	5
Impacts - cumulative - health	In regard to health data, there's little if any discussion about secondary or cumulative effects.	No health risk analysis was undertaken for reasons stated in Section 4.8.3 of the DEIS. So, the DEIS and FEIS contain no statements on secondary and cumulative health effects.	1
Impacts - cumulative - health impacts	The air quality and related health impacts of the DIFT alternatives have not been adequately described.	Possible health effects of PM2.5 and air toxics are noted in Section 4.8.3 of the DEIS. The reasons why no additional analysis of health effects will be done are stated in that section.	1
Impacts - cumulative - intermodal	There is a lack of discussion associated with existing conditions and how the DIFT will change the existing conditions. Specifically, how will the DIFT impact the Ambassador Bridge?	The discussion of existing land uses is included in Section 4.6 and future land uses is in Section 4.17. The positive and negative indirect and cumulative effects are cited at the end of Section 4.17. U.S.-Canada intermodal truck traffic carried on the Ambassador Bridge is very minor. The DIFT will have almost no effect on the Ambassador Bridge.	1
Impacts - cumulative - other projects	There should be a comprehensive assessment of all transportation-related projects, including I-94 and bridge expansion.	The projects mentioned in the comment are all included in the analysis of indirect and cumulative effects documented in Section 4.17. A new "Delray" bridge to Canada plus the proposed second span of the Ambassador Bridge are discussed in the revised indirect and cumulative analysis for this FEIS.	8
Impacts - cumulative - residential	If businesses do relocate in the DIFT area, this raises concerns about additional indirect impacts on the remaining residential areas surrounding the yard.	The positive and negative indirect and cumulative effects of the Preferred Alternative are cited at the end of Section 4.17. The effects of relocating businesses due to expansion of the Livernois-Junction Yard, the area of the Preferred Alternative, are included in Section 4.17.	1

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - cumulative - SEMCOG	The DEIS fails to discuss the future impacts of the DIFT as they relate to the projects in SEMCOG's 2030 Plan, other local projects in the planning process, and other private developments.	Section 4.17 mentions all of the projects listed in the comment and discusses their positive and negative indirect and cumulative effects. A NEPA document does not evaluate the adopted Plan of a Metropolitan Planning Organization such as SEMCOG.	1
Impacts - cumulative - traffic	The traffic pattern analysis is incomplete and does not account for foreseeable impacts of other transportation projects.	The traffic analysis, documented in Section 4.1, addresses DIFT-related traffic by comparing the highest forecast for each Action scenario to the lowest forecast of No Action. The traffic of other projects included in SEMCOG's plan is incorporated in the analysis by using SEMCOG's traffic data and roadway network for future conditions. The activities of AMTRAK and commuter rail expected to move through the Livernois-Junction Yard are included in Section 4.9.1.	1
Impacts - cumulative - trucks	A comprehensive analysis of the major truck generators in the community and transportation projects is needed.	The traffic analysis for this EIS takes into account existing truck traffic, relocation of some generators by the project, and the traffic generated by the project. A study of all truck generators in the area is beyond the scope of this EIS.	1
Impacts - disproportionate burden AQ	South Dearborn and Southwest Detroit already bear a disproportionate burden of air quality problems.	The pollution burdens in those areas are presented in Section 4.8.7.2, as represented by data collected at air pollution monitoring stations (Section 4.8.2).	1
Impacts - disproportionate burden AQ - adding to	Southwest Detroit is the second or third most polluted area in the country with Zug Isle and all the industry. Bringing trucks with the diesel fuel is going to add to the pollution we already have.	The roadway air quality burden with the Preferred Alternative decreases in some locations in South Dearborn and Southwest Detroit and increases in others as is presented in Table 4-29.	1
Impacts - disproportionate burden - take away problems	Existing deficiencies in Southwest Detroit's air quality and roadways need to be addressed.	The air quality burden produced by mobile sources with the Preferred Alternative will be better managed than today by locating terminal gates/entry points away from the neighborhoods; by relocating to other areas away from these neighborhoods truck-dependent businesses; and, by improving Central Avenue.	1
Impacts - economic analysis	Is this a priority that the state needs to be spending money on?	MDOT and the Federal Highway Administration believe so. The project Purpose and Need Statement identifies why the project has been undertaken. Economic benefits are described in Section 4.5.	1



## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - economic analysis - brownfields	The clean-up and redevelopment of any contaminated parcel considered for acquisition must be done in compliance with Part 201 of PA451 of 1994. Grants and loans are available for environmental assessments, clean-ups and redevelopment of Brownfield sites. Funds are targeted to promote economic development and reuse of brown fields.	Comment acknowledged.	1
Impacts - economic analysis - job retention	Retention of housing, business and jobs should be reviewed.	MDOT will relocate locally those who wish to remain in the area.	1
Impacts - economic analysis - local	An independent review of economic impacts is needed.	Section 4.5 summarizes the findings of the <i>Economic Impact Analysis Technical Report</i> . Additional analysis is not required by FHWA.	1
Impacts - economic analysis - mitigation	A plan is needed to encourage business development and create local jobs.	Section 5 contains mitigation measures to retain and grow local jobs around the Livernois-Junction Yard, the site of the Preferred Alternative, and to train local residents to qualify for those jobs.	5
Impacts - economic analysis plan	Where is the business plan for the DIFT?	The framework of the business plan, including the concept of governance, is included in the Appendix F in the Pre-Development Plan Agreement.	1
Impacts - economic analysis proposal	The proposal that Michael Belzer and his colleagues wrote about three years ago to provide a solid framework for tying transportation dollars to the host community will be resubmitted.	Comment acknowledged.	1
Impacts - economic analysis REMI	The REMI model used in the DIFT analysis is designed for use at a regional level and less accurate at a local level.	The economic analysis cites all the issues affecting its application. The forecast gain with the Preferred Alternative of 1,542 permanent jobs in the terminal area and 4,514 statewide through intermodal operations are valid forecasts using a recognized tool from the University of Massachusetts.	2
Impacts - economic investment	We need an investment, not just an industrial infrastructure, be it border crossings or intermodal freight terminals and our economic capital.	Comment acknowledged.	1
Impacts - EJ	Existing environmental problems were not addressed in the Environmental Justice analysis.	Table 7-4 summarizes the results of over 100 interviews held with community representatives and highlights issues and concerns, affecting key populations, general issues, including environmental issues, and opportunities. Section 4.3.2, "Environmental Justice" of the EIS specifically covers land use, air quality, noise, contaminated sites, and water quantity and quality.	1

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - EJ	Environmental Justice impacts were not thoroughly analyzed and considered.	Impacts to the local community have been identified and are the subject of Section 4 and mitigation as identified in Section 5. That documentation recognizes positive and negative effects on EJ populations and concludes as follows: "there will be disproportionately adverse housing and cultural resource effects on minority or low-income populations" covered by the EJ Executive Order.	13
Impacts - EJ AQ	Populations near the terminal area are disproportionately impacted in terms of air quality.	Pollution from all trucks is expected to decline. While the pollution discussed in the comment may be disproportionately distributed, it is not the result of intermodal traffic now or in the future. The cause is industrial pollution and possibly other mobile source generators. Nonetheless, impacts to the local community have been identified and are the subject of Section 4 and mitigation as identified in Section 5. That documentation recognizes positive and negative effects on EJ populations and concludes there will be disproportionately adverse housing and cultural resource effects on minority or low-income populations covered by the EJ Executive Order.	2
Impacts - EJ boundaries	The Environmental Justice analysis should make comparisons to populations in a larger area such as the region.	As explained in Sections 4.3.1 and 4.3.2 of this FEIS, the Detroit Urbanized Area is the basis of comparison to each of three defined "terminal areas" which range in size from 22 to 35 square miles and 140,000 to 164,000 people. The terminal areas are aggregations of census tracts around each terminal. The Detroit Urbanized Area is defined in the footnotes to Table 4-12 and shown in Figure 4-13c.	2
Impacts - EJ boundaries & Purpose and Need	The relevant geographic area for the DIFT EJ analysis is Southeast Michigan.	As explained in Sections 4.3.1 and 4.3.2 of this FEIS, the Detroit Urbanized Area is the basis of comparison to each of three defined "terminal areas" which range in size from 22 to 35 square miles and 140,000 to 164,000 people. The terminal areas are aggregations of census tracts around each terminal. The Detroit Urbanized Area is defined in the footnotes to Table 4-12 and shown in Figure 4-13c.	1
Impacts - EJ boundaries graphic	What is the boundary of the Detroit Urbanized Area?	A graphic, Figure 4-13c, has been added to show the boundary.	1
Impacts - EJ boundaries - zip codes	The selection of comparative populations for the EJ analysis makes little sense.	The terminal areas represent cohesive groupings of neighborhoods/areas of influence. They were reviewed by the Local Advisory Council and were modified as a result.	1

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - EJ - community involvement	The application of Environmental Justice principles requires community involvement.	Many meetings were held with the general public, interested groups, and stakeholders (see Section 7) to ensure everyone understood the project, its impacts, and its opportunities. The Executive Order on Environmental Justice is quoted in Section 4.3.2. Community improvement measures were generated by community members and MDOT.	2
Impacts - EJ - conclusion	The draft EIS erroneously concludes that minority and low income communities will not be disproportionately and adversely impacted by the DIFT.	Section 4.3.2 covers Environmental Justice issues. It opens with an explanation of the Executive Order, and provides information on the subject populations. To prevent repetition, figures earlier in the EIS are referred to. The comparison base for each terminal area is the Detroit Urbanized Area. All impact categories are reviewed for all alternatives. Table 4-15 summarizes direct and indirect impacts: mobility, economic impacts, land use, air quality, community effects, noise, Section 4(f) resources, contaminated sites, and water quality. Table 4-16 summarizes these same topics in terms of cumulative impacts. Impacts to the local community have been identified and are presented in Section 4. Mitigation is identified in Section 5. The analysis recognizes positive and negative effects on EJ populations and concludes there will be disproportionately adverse housing and cultural resource effects on minority or low-income populations covered by the EJ Executive Order.	1
Impacts - EJ - correction	The accuracy of the minority data used in the EJ analysis is in question.	The method of the commenter is slightly different than the method used by MDOT. Conclusions are not affected. The same areas continue to be considered environmental justice areas.	1
Impacts - EJ correction - approach	The Environmental Justice analysis failed to include the "some other race alone" and "two or more races" categories.	The stated approach was not used in the analysis. The analysis used a threshold of at least 2% of the Urbanized Area's population to define the affected group.	1

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - EJ - deficient	The DEIS states that the populations of the affected terminal areas are dominated by groups covered under Environmental Justice, acknowledges adverse impacts, yet concludes there will be no disproportionate adverse impacts.	This FEIS recognizes that over time, undesirable environmental features have accumulated from industrial and related transportation developments. Some have existed for many years. Public resources to address many of these conditions have been lacking. The DIFT Project is envisioned as a way for public and private sector investments to bring some measure of improvement to existing rail activity with the selected populations knowing the activity will expand in the future with or without the project. On balance, the investments and improvements of Action Alternatives are seen to be beneficial to those populations compared to the No Action Condition.	7
Impacts - EJ - definitions	The DEIS should provide accurate definitions of race, ethnicity and/or national origin of residents of the affected area for the purpose of addressing Environmental Justice.	Such definition is in Sections 4.3.1 and 4.3.2.	1
Impacts - EJ - health	How are environmental health issues addressed under Environmental Justice?	Health effects of PM2.5 and air toxics are noted in Section 4.8.3. The reasons why no additional risk analysis of health effects will be done are stated in that section. The EIS finds disproportionate effects of the proposed project on environmental justice populations. All alternatives would affect environmental justice populations.	5
Impacts - EJ - health risk analysis	A health impact study must be conducted as part of the EIS given that there is a disproportionately high adverse pollution burden on minority and low income communities.	A health risk analysis is not required and has not been done for the reasons cited in Section 4.8.3.	1
Impacts - EJ - issues	A better definition of environmental justice issues is needed.	"Environmental justice" is defined in Section 4.3.2. The EIS finds disproportionate effects of the proposed project on environmental justice populations. All alternatives would affect environmental justice populations.	2

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - EJ - jobs	The environmental analysis conclusion suggests that job creation associated with the project should be viewed as balancing out negative impacts on air and water quality and health. This violates the Executive Order on Environmental Justice.	This FEIS recognizes that over time, undesirable environmental features have accumulated from industrial and related transportation developments. Some have existed for many years. Public resources to address many of these conditions have been lacking. The DIFT Project is envisioned as a way for public and private sector investments to bring some measure of improvement to existing rail activity with the selected populations knowing the activity will expand in the future with or without the project. On balance, the investments and improvements of Action Alternatives are seen to be beneficial to those populations compared to the No Action Condition.	1
Impacts - EJ - Title VI	There is no separate evaluation of impacts under Title VI of the Civil Rights Act of 1964.	The separate evaluation was done and is found in Section 4.3.1.	1
Impacts - EJ - Title VI - comparison	The Arab-American, Hispanic and American Indian populations have not been analyzed as special groups that dominate each terminal area.	The populations identified in the comments are listed in Section 4.3 and Table 4-12 in that section. Section 4.3.2 covers Environmental Justice.	1
Impacts - EJ - Title VI - fragmentation	Any expansion of the Junction Yard would serve to further fragment the community, particularly the Arab and Hispanic communities.	The expansion of the Livernois-Junction Yard under the Preferred Alternative would be to the north of John Kronk and south into a largely industrial area. The relocated population of 32 residences is a mix of white, black and Hispanic. Every effort will be made to relocate this population away from the railroad yard itself, if the people choose. The same is true of businesses, many of which indicated in earlier interviews the intention to relocate in the larger terminal area. Closing Lonyo will cause more circuitous travel for those using that connection today, including Arab-American families south of the Livernois-Junction Yard traveling to and from Star Academy, but with the alternative routes, there will be no conflict with trains as the Central Avenue connection will be grade-separated. This will improve the safety of the community, pedestrians and motorists, as there would be no at-grade crossing of the rail yard, which has proven in the past to be hazardous. Counts of pedestrians and bicycles on Lonyo found no activity.	1

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - EJ - tradeoff	You cite economic factors that are not relevant to environmental justice. You cannot mitigate people's health by offering them the possibility of a job.	Some mitigation of impacts are considered enhancements. Also, the improvements in terminal operations by, for example, keeping intermodal trucks out of neighborhoods, will benefit air quality. Guidance from the U.S. Department of Transportation in their "Order To Address Environmental Justice in Minority Populations and Low-Income Populations," states in Section 8.b. "In making determinations regarding disproportionately high and adverse effects on minority and low-income populations, mitigation and enhancements measures that will be taken and all offsetting benefits to the affected minority and low-income populations may be taken into account" (Federal Register pages 18377-18381, April 15, 1997). Short-term construction and long-term jobs will come with the project and may be considered enhancements.	1
Impacts - farmland	There is no potential for a negative effect on prime or unique farm land.	Comment acknowledged.	1
Impacts - general	The DIFT has the potential to impact residents and the environment.	Comment acknowledged.	3
Impacts - hazmat	With respect to the contamination report and soil test, what kind of contamination was found?	The types of enhancements are cited in Section 4.16.	1
Impacts - hazmat - asbestos	The final FEIS should indicate whether or not lead and asbestos exist in buildings to be demolished and describe plans for their safe handling, removal and disposal.	Section 4.16 notes the likely presence of asbestos in the buildings to be demolished. Assessment of asbestos-containing materials and lead-based paints will be conducted during the property acquisition phase of the project. MDOT construction specifications address such activities.	1
Impacts - hazmat - coordination	On contamination sites, coordination should occur within DEQ's Waste Management Division and Remediation and Redevelopment Divisions.	Coordination has occurred through file review at MDEQ during the Project Area Contamination Survey. Coordination will continue in order to address contamination issues.	1
Impacts - hazmat - Moterm	There is concern associated with the handling of additional hazardous materials at the Moterm facility.	Comment acknowledged.	5
Impacts - hazmat - operations	Increased intermodal activity has the potential to create additional soil and water contamination.	Participating railroads have Emergency Response Plans to comply with applicable federal and state requirements concerning hazardous and petroleum storage, handling, spill prevention, spill response, incident response and related concerns. As a practical matter, the Livernois-Junction Yard will be paved with the Preferred Alternative and oil/water separators will be included in the surface water drainage system.	2

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - hazmat - rail operations	Locomotive maintenance, rail car refurbishing and maintenance, and track maintenance can result in environmental problems.	The Preferred Alternative will not change railroad operations with respect to rail car refurbishing and maintenance, or track maintenance.	1
Impacts - hazmat - remediation	What type of remediation will be given to residents within 1000 feet of an intermodal site?	Remediation of contaminated properties occurs with property acquisition, but only of the property being acquired. If the commenter is referring to local improvements, these are presented in Section 5.	2
Impacts - hazmat - remediation type	Remediation of railroads depends on the contaminants present, their concentration and the media they're affecting (soil or water). In addition, selecting remediation strategies also involves an in-depth analysis of the cost associated with development.	No project-related testing is required on existing railroad properties.	1
Impacts - hazmat - soil borings	Where does the soil study along the St. Stephen's area of the city of Dearborn stand at this time?	As is stated in Section 4.16, no soil borings were performed in Dearborn. They will be performed if properties are acquired for the Preferred Alternative, in the next project phase after a signed Record of Decision.	1
Impacts - hazmat - transport	There are safety concerns associated with the transport of hazardous materials in such close proximity to residences.	Typically, intermodal containers are not used to handle hazardous materials except such items as paint or other items in controlled conditions. These latter materials are subject to the same regulation and control that applies to materials in railroad tank cars and trucks. Whatever incidental hazardous materials would be carried by train are now carried by truck.	6
Impacts - insurance costs	The state is trying to propose trucks coming into our communities. The trucks will increase our insurance costs, which are already going up.	Trucks volumes will be reduced in neighborhoods based on the gate configurations of the Preferred Alternative.	1
Impacts - interviews	Community opinion should prevail over data presented in the DEIS.	Comment acknowledged.	1
Impacts - interviews - blight	Blight should be included as a significant community concern in the community interview descriptions.	The term "blight" was not noted in the interviews. Pollution, truck traffic and industrial dumping were noted.	1
Impacts - land use	The DIFT is a massive industrial use contrary to ongoing efforts of the community to plan for a better, more healthful, land use.	Comment acknowledged.	1

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - land use - 2004 plan	The City of Detroit 2004 Master Plan of Policies directs the City to "demolish vacant and/or dangerous structures and encourage rehabilitation and infill housing"; "buffer the negative impacts of industrial land uses upon residential areas"; "redevelop the underutilized sites in the corridor by attracting new and encouraging small-scale industries to use the land for expansion or relocation"; and, "support diverse, year-round recreational activities at the State Fairgrounds".	Comment acknowledged. The 2004 plan was not official at the time the DEIS and FEIS were prepared, so it could not be used as the basis of analysis, but its contents were reviewed, and there are no known changes in impacts/conclusions.	4
Impacts - land use - business investment	Without a mix of businesses, the chance of getting private industries is drastically reduced. The removal of 64 businesses does not encourage private investment or diversity in local business.	The Preferred Alternative would relocate 29 businesses. MDOT is committed to help relocate these businesses within the local area, if they so choose. Redevelopment of the Livernois-Junction Yard as part of the Preferred Alternative is forecast to support other positive economic development efforts.	1
Impacts - land use - control	Over 31 percent of the occupied land in Southwest Detroit is used for industrial transportation purposes. The DIFT must not increase this percentage. It must contribute to the quality of life and a strong local economy.	Redevelopment of the Livernois-Junction Yard as part of the Preferred Alternative is forecast to support other positive economic development efforts.	1
Impacts - land use - control cities	Land use changes could be associated with the mixing of land use types that are unwanted with the DIFT. However, no mitigation is recommended.	The unwanted mixing is not of incompatibility with the rail terminal but the land uses in the terminal area per Section 4.17.1. Nonetheless, control of land use resides with the cities of Dearborn and Detroit. MDOT has no jurisdiction over land use.	1
Impacts - land use - existing container yard	Acquiring the existing intermodal container yard on the north side of Dix west of Waterman should be explored. This use is a large piece of land adjacent to the Livernois-Junction yard which is very poorly maintained, and this land could help meet the capacity requirements of the DIFT.	It is believed that the property noted in the comment would be part of the DIFT Program.	1
Impacts - land use - Expressway Terminal	If you're taking all the property around the train station, it's going to sit there for another 20 years, because there won't be enough parking for another use of that land.	The Preferred Alternative makes no use of the CP/Expressway Terminal at the Michigan Central Depot.	1
Impacts - land use - issues	The project should assist understanding of issues affecting the community and develop, implement, and evaluate plans of action that will address those issues.	A reading of this FEIS does assist understanding of these issues, especially Section 7.2.1, which summarizes the views of community leaders. The DIFT Project includes actions to enhance the community. See Section 5.	1



## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - land use - MLULC	The DEIS invokes the recommendations of the Michigan Land Use Leadership Council (MLULC) report as evidence that action alternatives represent a good land use decision. The fourth tenant of that report states "foster distinctive attractive communities with a strong sense of place." Expanding the railroad into just such a community eliminating residences and businesses and increasing the amount of truck traffic by approximately 5000 trips per day is not justified under this directive.	Intermodal trucks will be routed along streets away from neighborhoods. Jobs will be created that will afford employment to local residents. Community improvements will provide other local enhancements. Therefore, the Preferred Alternative is consistent with the Michigan Land Use Leadership Council Report.	1
Impacts - land use - Moterm	It should be demonstrated that the proposed expansion of the CN Terminal into the State Fairgrounds would not hinder the redevelopment of neighborhoods immediately surrounding the proposed site.	The Preferred Alternative does not affect the Moterm Terminal. CN has indicated it will not expand into the Fairgrounds.	3
Impacts - land use - options	A vibrant urban center needs to have an extensive set of options to attract new residents. By concentrating the development around one entity or industry, you are limiting those options and the possible attractiveness of moving to that area of the city.	The Preferred Alternative is consistent with historic use of the railroad property, which has had for almost 100 years residential uses immediately to the north and south of it. With the Preferred Alternative, residential areas will be buffered from the Livernois-Junction Yard with security walls and landscaping.	1
Impacts - land use plan	The analysis of the land use and social environment is based on obsolete and incomplete data. The Master Planning documents of 2004 more accurately depict Detroit and the neighborhoods, but the City's 1992 Master Plan document was used.	The 2004 plan was not official at the time the DEIS and FEIS were prepared, so it could not be used as the basis of analysis, but its contents were reviewed, and there are no known changes in impacts/conclusions.	1
Impacts - land use - property values	By eliminating 93 houses and having a 300-400 acre intermodal rail yard in the center of a community, the availability of housing options is reduced and will possibly reduce property values.	Residents of 32 housing units will be relocated, which is a reduction of previous estimates as several houses in the relocation area no longer exist. Decent, safe, and sanitary housing is available, as concluded in the Relocation Plan - Conceptual Stage, Appendix B. Property values are not expected to drop based on the experiences at terminals like that in Melvindale, Michigan as well as terminals at similar settings in Chicago (refer to Technical Report No. 3 of the DIFT Feasibility Study).	1
Impacts - land use - proximity to residential	The Livernois-Junction Yard is in close proximity to large residential areas in Dearborn and Detroit.	The Preferred Alternative would not be directly adjacent to any residential area that does not have industrial exposure today. With the project, any residential area adjacent to the terminal would be buffered, which is not the case today.	2

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - land use - residence inventory	An inventory of residences located less than or equal to 1000 feet of an intermodal site should be provided.	Comment noted. Off-site impacts are limited to noise from trucks and trains. Noise levels exceeding criteria will be mitigated.	1
Impacts - land use - revitalization	The DEIS paints a picture of Southwest Detroit's communities as on an upswing due to the variety of local owned business and residential neighborhoods. In both the consolidation and composite alternatives, there's a proposed elimination of parts of these same residential neighborhoods and local shopping districts. The DEIS fails to justify that disruption of the upward revitalization trend.	The Preferred Alternative would require the relocation of people in 32 residences, but no local shopping district. The residential section slated for relocation is directly next to industrial uses. The remaining neighborhood would be buffered from the Livernois-Junction Yard. It is not today. Truck traffic is forecast to increase only on roads that are predominantly industrial/commercial and decrease on streets serving residential areas. The project will complement the upward revitalization trend through design of the Preferred Alternative, its mitigation plan and its economic stimulus.	1
Impacts - land use - shopping center	The neighborhood has long sought a major shopping center and such a place may develop at the northwest corner of Vernor and Livernois. This project can make that happen.	Comment acknowledged.	1
Impacts - land use - trends	The DEIS fails to provide adequate study of the future land use trends expected.	The Preferred Alternative is virtually no different in land use activity than today. But, it will improve in its compatibility with the surrounding areas by revised truck routings, buffers, paving and community improvements (Section 5).	1
Impacts - Metropark	A Metro Park is desired at the Fairgrounds to provide additional local recreational opportunities.	The Preferred Alternative does not include any changes at the Moterm Terminal or the State Fairgrounds.	19
Impacts - noise - containers	Additional container movement will generate additional noise. This has not been accounted for in the DEIS.	The noise analyses of the DIFT DEIS/FEIS require mitigation for noise in the loudest hour. The nature of this noise metric is such that it is designed to control continuous noise, not "impulse noise." Impulse noise, such as container handling, is controlled by local noise ordinances, in this case the cities of Detroit and Dearborn. The entire Livernois-Junction Yard will be buffered from non-industrial uses so that the noise in the loudest hour does not exceed the established criterion of 67 dBA at sensitive receptors, such as homes.	5
Impacts - noise - containers - Moterm	Noise associated with existing container movement at the Moterm facility is excessive.	The Preferred Alternative does not include any changes at the Moterm Terminal or the State Fairgrounds that would have any effect on current intermodal operations at the Moterm Terminal.	3

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - noise - trains	There is no noise analysis associated with the movement of trains on terminal property.	The train noise analysis is documented in the Noise and Vibration Technical Report and summarized in Section 4.9. All sensitive areas around the project will be properly buffered to reduce projected noise to levels below established residential criteria.	1
Impacts - noise - trains - Moterm	Existing train noise at the Moterm facility is excessive.	The Preferred Alternative does not include any changes at the Moterm Terminal or the State Fairgrounds that would have any effect on current intermodal operations at the Moterm Terminal.	3
Impacts - noise - truck	With additional truck traffic, noise levels will increase.	The Preferred Alternative will reduce noise from the terminal where there are adjacent sensitive receptors. Intermodal trucks will be focused on Wyoming and Livernois Avenues north of the terminal. South of the terminal, on Livernois and Dagoon, intermodal truck traffic will be reduced as the terminal entrance will be configured to prevent entry/exit from the south. Furthermore, the Detroit River International Crossing Study includes closing the I-75 interchange at Livernois/Dagoon, thereby eliminating intermodal traffic on these streets.	2
Impacts - noise - truck - Vernor	The existing truck related noise on Vernor Highway is excessive.	The Preferred Alternative will not increase truck volumes on Vernor. The existing entrance at Waterman to the Livernois-Junction Yard will be closed by the Preferred Alternative, eliminating intermodal trucks from the area.	1
Impacts - noise - vibration	The vibration of the trucks and how it will impact homes is a concern.	The Preferred Alternative routes trucks away from residential areas. Vibrations travel only a very short distance.	1
Impacts - noise - distraction	An increase in traffic will result in an increase in noise in South Dearborn, distracting students from their lessons.	The change in intermodal trucks on Wyoming Avenue with the Preferred Alternative will have no perceptible impact on noise conditions compared to the No Action condition.	1
Impacts - noise - Expressway Terminal	Under Alternative 2, how would a sensitive community facility such as a hospital (United Community Hospital) just 90 feet away from this expanded intermodal terminal not be affected?	The United Community Hospital has closed.	1

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - NW Detroit	The discussion of the CN/Moterm facility fails to acknowledge the existence of the entire Northwest side of Detroit and the area between the Fairgrounds and Highland Park, which was critical to the selection of alternatives.	The discussion of the potential direct, indirect and cumulative effects with the CN/Moterm facility covered an area in Northwest Detroit and Southern Oakland County that is 22 square miles with more than 140,000 people according to the 2000 U.S. Census. That area includes Highland Park and the area between it and the Fairgrounds. The analysis also covered the Highland Park Comprehensive Plan and its relation to the existing intermodal terminal and its proposed expansion.	1
Impacts - old data	Much of the data used in the study is outdated or incomplete.	The DEIS and FEIS have used the most up-to-date data available at the time of analysis, consistent with National Environmental Protection Act (NEPA) requirements.	1
Impacts - parks	DIFT impacts to Patton Park, Lapeer Park, and Romanowski Park have not been fully considered.	There will be no negative effect on these parks.	1
Impacts - parks - Loverix Park	Loverix Park at Tractor and Robert Streets no longer exists.	Loverix Park, though inactive, does exist at a location east of Wyoming and north of Tractor Street.	3
Impacts - property values	What are the potential impacts to property values near an expanded intermodal facility?	An analysis performed during the DIFT Feasibility Study found that property values near two comparable intermodal sites in Chicago were stable or increased (see Figures 4-3 to 4-6 of that report for photographs and data). A review of Multiple Listing Service data on some sales in the vicinity of the intermodal terminals in Southeast Michigan found the same.	4
Impacts - property values and road maintenance - Dearborn	Additional truck traffic would likely cause decreases in surrounding property values and increase the burden to the City of Dearborn for the cost of additional road maintenance and repair.	The economic analysis included in Section 4.5 indicates conversion of private land to government ownership and the loss of property tax revenue will be more than offset by the tax gains due to increased economic activity associated with improving intermodal transportation in Southeast Michigan. The increase in truck traffic on Wyoming will be negligible relative to background values.	2
Impacts - property values - Moterm	An expanded Moterm terminal would have a negative impact on property values.	The Preferred Alternative does not include any changes at the Moterm Terminal or the State Fairgrounds.	8
Impacts - property values - tax revenues	Decreased property values as a result of increased rail and truck activity, traffic congestion, noise and air pollution is a concern.	The economic analysis included in Section 4.5 indicates conversion of private land to government ownership and the loss of property tax revenue will be more than offset by the tax gains due to increased economic activity associated with the improving intermodal transportation in Southeast Michigan.	1

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - quality of life	The project will affect the air we breathe, increase traffic, cause distraction at neighborhood schools, and limit the connection between our communities and family members.	Intermodal truck traffic will follow the routings on Wyoming Avenue and on Livernois Avenue, north of the Livernois-Junction Yard. Intermodal trucks will be reduced on Livernois and Dagoon south of the terminal. Lonyo will be closed, causing a more circuitous route by two minutes via Central, when there is no train. But, when trains are present, which occurs many times a day, the new Central route will have no conflict, as it will be grade-separated under the railroad, more than offsetting the two-minute additional travel time with Lonyo closed.	2
Impacts - quality of life - Dearborn	Trucks are very close to residential areas in Detroit near Livernois and in Dearborn near the Eugene Porath neighborhood and north of Lapeer Park.	A number of homes have been bought and cleared by the City of Dearborn in the Porath neighborhood. Lapeer Park is a block away from Wyoming and more than a block away from the new terminal gate of the Preferred Alternative. It will not be affected by the Preferred Alternative.	1
Impacts - quality of life - greening	Additional truck traffic could hinder the community revitalization that has been occurring, including planned greenway developments in the Southwest Detroit/Dearborn and lower River Rouge corridor.	The project will bring its own greening through the planned buffers that complement other planned initiatives. Intermodal truck traffic will be focused on commercial/industrial areas and away from residential areas.	1
Impacts - quality of life - increased activity	All the alternatives increase traffic in an area of Detroit and South Dearborn that already has levels of truck traffic that are untenable. It affects the quality of life with noise and vibrations.	Intermodal truck traffic will be focused on commercial/industrial areas and away from residential areas. The Preferred Alternative further separates a new terminal gate on Wyoming south of Southern Street from the nearest residential area, as compared to alternatives presented in the DEIS. Noise and vibrations caused by intermodal activity will not be perceptible compared to the No Action Alternative.	1
Impacts - quality of life - Moterm	Quality of life issues, such as noise and air quality, must be considered at the Moterm Terminal.	The Preferred Alternative does not include any changes at the Moterm Terminal or the State Fairgrounds.	10
Impacts - quality of life - Moterm community benefits	Quality of life issues, such as noise and air quality, must be considered at Moterm and community benefits must be part of the selected alternative.	The Preferred Alternative does not include any changes at the Moterm Terminal or the State Fairgrounds.	1
Impacts - relocation	There should be a relocation program, including compensation, for displaced residents and businesses.	Every attempt will be made to relocate in the Terminal Area persons and businesses affected by the Preferred Alternative, if they so choose.	18
Impacts - relocation - approach	Let's square up the boundaries when we buy properties; go after the whole ball game.	The Preferred Alternative defines the property acquisition needs and most appropriate way to configure the site to meet project needs.	1

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - relocation - business	Alternatives 3 and 4 appear to require the taking of Truck City immediately north of John Kronk between Stecker and Wyoming. To move this facility away from Junction Yard would seriously damage its competitive advantage and there is no justification for the taking of one active privately owned intermodal business for the purpose of providing the site to another privately owned intermodal business.	This property is not now required for the DIFT Project.	1
Impacts - relocation - business CenTra	The CenTra Company operates an intermodal freight facility at Central and Kronk. The Action Alternatives take all or part of this property. If this facility were forced to relocate, there is no assurance that another adequate facility could be located in the city of Detroit.	The property in question is part of the acquisition for the Preferred Alternative. Adequate opportunity exists for relocation of the operations on this property. Additionally, the related interests own a number of areas north of John Kronk between Stecker and Wyoming which are no longer part of the proposed terminal expansion. Relocation here of CenTra is, therefore, a possibility.	1
Impacts - relocation - business CenTra acquisition	Any change in the land uses in or around the existing or planned Junction Yard must include the provision of property interior to or immediately adjacent to Junction Yard that would permit the continued operation and future growth of the CenTra Company. Otherwise the action that would take the property of one privately owned active intermodal rail facility would provide that site to another privately owned intermodal rail facility for its expansion.	There is no provision in the Preferred Alternative for ancillary businesses, other than the first-class railroads, to be present on the Livernois-Junction Yard.	1
Impacts - relocation - business effect	Proposals 3 & 4 affect our business. Alternative 3 would be absolutely disastrous for our Central location, where access would be cut.	The properties in question are to be required for the project under the Preferred Alternative. Relocation of the businesses there will be done consistent with all applicable federal and state regulations. Acquisition of the property in question would be done consistent with federal and state laws/regulations. No property acquired for the project would be sold to a private interest.	1
Impacts - relocation effort	Sixty-four (64) businesses and eighty-three (83) residences will be relocated under Alternative 3. This has the potential for a tremendous disruption to this community.	Comment acknowledged. The proposed relocation totals for the Preferred Alternative are 32 residences and 29 businesses.	1

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - relocation - Expressway	Page 3-17, second to last paragraph states "Expanding the terminal would require the acquisition of...one institutional property and no residences." Presumably the property in question is the City of Detroit, DPW yard. The office building on this site is fairly new. Given this, and the importance and proximity of the yard and its office operations, what plans and contingencies will be developed to help in the transition to a new location?	The Preferred Alternative does not include any changes to the area in question.	1
Impacts - relocation - list	What data or database was used to calculate the number of residents and businesses that will be relocated? When was this data/database produced? Please provide updated copies.	The relocation areas were determined by field inspection. An interview was conducted by MDOT with each property owner that agreed to participate in order to establish relocation needs. The Preferred Alternative will require relocation of 32 residences and 29 businesses.	1
Impacts - relocation - No Action	We are demanding that the homes and businesses be left whole and that the improvements be done without the destruction of the community.	The Preferred Alternative requires relocations to meet the project's purpose and need.	1
Impacts - relocation - willing	I believe my house on Cabot Street and the others will be gone and I would like compensation.	The updated Conceptual Stage Relocation Plan is included in Appendix B. Answers to most questions related to right-of-way-acquisition and relocation are provided on MDOT's web site at: <a href="http://www.michigan.gov/mdot/">http://www.michigan.gov/mdot/</a> Click on "Doing Business" (left side), then on "Real Estate" (center). A number of explanatory documents are listed there.	1
Impacts - security - land use	We believe the Department of Homeland Security could have considerable influence on land use around the Ambassador Bridge as well as other major transportation infrastructures. We would be pleased if Congresswoman Cheeks Kilpatrick could set up a meeting to introduce DHS to these ideas.	An x-ray screening system known as VACIS is included in border crossing planning to screen trains coming into the U.S. The Department of Homeland Security and Congresswoman Kilpatrick are kept informed by MDOT about the DIFT and other major projects.	1
Impacts - security - military	Increased security and a military presence is of concern.	The railroads will maintain security at the rail yard. There will be no military "presence" in the terminal.	2
Impacts - security - military - containers	The Department of Homeland Security should ensure that all necessary protections are in place for the safe and efficient use of the Livernois-Junction Yard, that includes analysis of materials to be hauled through the community and limitations on certain hazardous materials and a plan to deal with hazardous materials incidents at the yard.	The containers of CP and CN are x-rayed before they enter Southeast Michigan. Additionally, the Preferred Alternative allows for an x-ray inspection device to be placed at the terminal of the Preferred Alternative operated by CSX and NS.	3

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - stormwater	Paving at Livernois-Junction Yard could have an impact on water quality due to increased run-off. A stormwater drainage treatment system is needed.	The Livernois-Junction Yard, and the expansion area to the north under the Preferred Alternative, will be paved. Stormwater will be properly handled as documented in Section 5.8. Permitting is covered in Section 5.4. All requirements related to water quality and discharge rates will be met.	6
Impacts - stormwater - acres	Paving 845 acres of land within the Livernois-Junction Yard will greatly increase the amount of rain runoff. The DEIS does not examine the expected increase in the frequency of combined sewer overflows.	There will be no increase in combined sewer overflows as the project's design will ensure that flow rates from the yard do not exceed today's levels (Section 5.8)	2
Impacts - stormwater - infrastructure	The draft EIS does not adequately analyze the ability of the Detroit sewer system to handle the increased runoff from the DIFT. The DEIS asserts that the runoff will be directed to onsite collection, however, no detail is presented. The DEIS notes that "no certainty exists" as to whether existing infrastructure will be able to handle the increased runoff.	The Livernois-Junction Yard and the expansion area to the north for the Preferred Alternative will be paved. Stormwater will be properly handled as documented in Section 5.8. Permitting is covered in Section 5.4. Further details of the stormwater system will be determined in the design phase.	2
Impacts - stormwater - monitoring	Water quality monitoring and improvements are needed to mitigate depositions to the Rouge and the Detroit rivers.	Stormwater monitoring is not warranted with the anticipated project stormwater controls.	1
Impacts - stormwater - petroleum	Runoff from the freight terminal is likely to contain significant amounts of petroleum products and the impact of this runoff on water quality is not addressed.	The Livernois-Junction Yard, and the expansion area to the north under the Preferred Alternative, will be paved. Stormwater will be properly handled as documented in Section 5.8. Permitting is covered in Section 5.4. Oil/water separators will be constructed on stormwater drains. Flow rates from the site will not increase.	1
Impacts - stormwater - recharge	Compacted and impervious surfaces also will reduce or prevent groundwater recharge.	The Livernois-Junction Yard and the expansion area to the north under the Preferred Alternative will be paved for efficient operation. Stormwater will be properly handled as documented in Section 5.8. Permitting is covered in Section 5.4. Sediment basins and vegetated ditches are incorporated into the design of the Preferred Alternative to promote infiltration.	1
Impacts - stress	The trucks create a stressful environment and our youthful residents aren't going to be able to use their neighborhood.	Intermodal truck traffic will follow the routings created by the project on Wyoming Avenue and on Livernois Avenue, north of the Livernois-Junction Yard. Intermodal truck traffic will be reduced on Livernois and Dagoon south of the terminal. The number of heavy trucks will be reduced on Central and Lonyo.	1



## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - trucks - Alternative 2 effects	Alternative 2 will result in 1,270 trucks per day compared to Alternative 1: a) more streets would be affected but with reduced severity; b) Detroit acceptance should be contingent on 100 percent state and/or federal funding for roadway improvements; c) the Central underpass would mitigate rail/vehicular conflicts and enhance safety; d) closing Lonyo would generate increased traffic at Central/Dix, requiring modifications.	Intermodal truck traffic will follow the routings created by the project on Wyoming Avenue and on Livernois Avenue, north of the Livernois-Junction Yard. Intermodal truck traffic will be reduced on Livernois and Dagoon south of the terminal. The number of heavy trucks will be reduced on Central and Lonyo. The increase in intermodal truck traffic on Wyoming and Livernois will be negligible relative to background traffic. Maintenance will no longer be required by Dearborn on Kronk, as it will be incorporated into the terminal. The new perimeter road of the terminal will be maintained by local governments. The Preferred Alternative includes improvements at Central/Dix.	3
Impacts - trucks - alternative effects - traffic signal	The potential for conflicts between intermodal traffic and other traffic at the Livernois Avenue Gate is too high. A traffic signal study with appropriate mitigation therefore should be planned for at this location.	The traffic signal already there will lower the potential for conflicts. No study is needed.	1
Impacts - trucks - alternative effects - truck traffic	Alternative 1 (No Action) has an increase in truck traffic that will accelerate damage to city streets, particularly at Livernois and Wyoming, and increase noise and dust, without any mitigation in place.	Comment acknowledged.	1
Impacts - trucks - annual	We're talking about an increase of 365,000 to up over 700,000 trucks and they're going mostly to the Junction Yard, is that true?	The numbers cited are lifts per year, not trucks, forecast for an expanded Livernois-Junction Yard. The Preferred Alternative will have an estimated 1,050,000 lifts a year and 3,880 two-way truck trips a day in 2030 at the Livernois-Junction Yard. But that truck total is less than 700 more than would be present under the No Action Alternative as businesses with lots of trucks are removed by the project.	1
Impacts - trucks - Central flooding	We live in a neighborhood where there are very poor drains and terrible sewer lines and you're talking about a tunnel for Central that's only going to flood.	The underpass (grade separation) at Central will include new equipment and new piping to ensure this does not occur.	1
Impacts - trucks - Central traffic	There is concern regarding increased noise and air pollution associated with additional trucks on Central Avenue.	Truck traffic on Central is serving existing businesses. It is anticipated, based on the planned footprint of the Preferred Alternative, a major truck generator will be relocated. It attracted 2,500 trucks per week in 2005, according to the terminal operators. Relocating it will have the effect of reducing truck traffic on Central Avenue. The planned interchange improvement at Livernois and I-94 will also encourage some truck traffic that now uses Central to use Livernois.	3

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - trucks - congestion	Additional truck traffic on already congested roads is unacceptable.	Section 4.1 documents that the existing roadway network has adequate capacity for all project-related traffic changes, if minor improvements to traffic signal timings/phasing are made.	1
Impacts - trucks - consultation	It is recommendation that a discussion with City Planning and Traffic officials is needed to gain a true picture of the present impacts.	MDOT has and will coordinate with local officials regarding proposed improvements.	1
Impacts - trucks - crashes/safety	There are potential safety risks posed by a significant increase in the number of trucks on neighborhood streets.	With the Preferred Alternative, intermodal truck traffic will follow the routings created by the project on Wyoming Avenue and on Livernois Avenue, north of the Livernois-Junction Yard. Intermodal trucks will be reduced on Livernois and Dagoon south of the terminal and the Dix/Waterman entrance will be closed.	6
Impacts - trucks - crashes/safety - design	Intersection enhancements are needed to address safety issues with truck/vehicle movement at intersections and terminal entrances and exit points.	Design at all gates will follow American Association of State Highway Officials (AASHTO) guidelines, thereby addressing safety needs.	1
Impacts - trucks - Fairgrounds	There will be increased traffic around the Fairgrounds.	The Preferred Alternative does not include any changes at the Moterm Terminal or Fairgrounds.	6
Impacts - trucks - gates	All gates except on Wyoming and Livernois should be prohibited now and in the future.	The Preferred Alternative has gates only off of Livernois and Wyoming Avenue.	1
Impacts - trucks - I-75 route	What routes will trucks use to reach the proposed western entrances of the Livernois-Junction Yard along Wyoming from I-75? What percentage of trucks is expected to come from I-75 versus I-94 under each alternative?	Intermodal truck traffic is expected to approach the Wyoming gates to the terminal via I-94. Traffic on I-75 can either use Southfield or Schaefer to get to I-94. With the Preferred Alternative, 80% of trucks are expected to come from I-94 and 20% from I-75.	2
Impacts - trucks - I-94 ramp	Reconstruction of Central below grade and reconstruction of the I-94 Livernois ramp are important improvements that should occur whether or not MDOT ultimately builds the DIFT.	Central Avenue is a local road. Its improvement and that at the I-94/Livernois Avenue interchange are specifically tied to the Preferred Alternative.	1
Impacts - trucks - I-94/Livernois interchange	The improvements at Livernois and I-94 will encourage use of Livernois as a route from Metropolitan Airport and points west to Eight Mile Road and the CN/Moterm facility.	The proposed I-94 change at Livernois Avenue is intended to encourage use of Livernois as a route to the east-side terminal gate rather than streets through neighborhoods and will not serve as a corridor to Eight Mile Road and the CN/Moterm facility.	1
Impacts - trucks - information	Basic information on the number of trucks and trains for each alternative and the number of acres occupied by each alternative is difficult to locate.	Traffic truck data are prominently displayed in Section 4.1. The numbers of trains of all types using or passing by the Livernois-Junction Yard terminal at the key link next to the neighborhood on Kronk are presented in Table 4-37.	1

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - trucks - Lonyo	Lonyo should not be closed.	Eliminating roads crossing the Livernois-Junction Yard is critical to the function of the terminal and the safety of motorists and pedestrians. Automotive traffic now using Lonyo Avenue that will be rerouted to Central Avenue will take an additional two minutes, but no trains will ever be encountered, eliminating the potential for severe accidents, which have occurred. Counts found pedestrians or bicyclists do not use Lonyo to cross the railroad tracks.	10
Impacts - trucks - Lonyo gate	A new gate at Lonyo north of Dix should not be permitted.	The access to the gate referred to is from Wyoming, so the gate is internal to the future Livernois-Junction Yard.	1
Impacts - trucks - Lonyo school	Closing Lonyo will have negative impacts on community cohesion and the local charter school.	Field observation found students at the charter school are either dropped off by car or take a school bus - these vehicles can reroute to Central Avenue without encountering trains, eliminating the potential for severe accidents. The number of trains will increase over time with or without the project.	3
Impacts - trucks - Lonyo - school rail crossing eliminated	Closing Lonyo Avenue will have a negative effect on Dearborn as it is the main route to the neighborhoods and local charter school.	Eliminating roads crossing the Livernois-Junction Yard is critical to the function of the terminal and the safety of motorists. Automotive traffic now using Lonyo Avenue that will be rerouted to Central Avenue will take an additional two minutes, but no trains will ever be encountered, eliminating the potential for severe accidents, which have occurred. Counts found pedestrians and bicyclists using Lonyo and crossing the railroad tracks.	2
Impacts - trucks - Lonyo	Lonyo should remain open. Rerouting all the trucks that are going to Mars through Central is kind of defeating the purpose.	Eliminating roads crossing the Livernois-Junction Yard is critical to the function of the terminal and the safety of motorists and pedestrians. Automotive traffic now using Lonyo Avenue that will be rerouted to Central will take an additional two minutes, but no trains will ever be encountered, eliminating the potential for severe accidents, which have occurred. Counts found pedestrians and bicyclists do not use Lonyo to cross the railroad tracks.	1
Impacts - trucks - Moterm	Increased truck traffic is a concern associated with expansion at the Moterm terminal.	The Preferred Alternative does not include any changes at the Moterm Terminal or Fairgrounds.	2

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - trucks - noise	I am concerned about the increase in truck traffic, noise and vibrations of my home.	A doubling of traffic volumes is required to have a perceptible increase in noise levels. This will not occur anywhere because of intermodal traffic associated with the Preferred Alternative. The project will bring fewer than an additional 700 trucks to the local road network in 2030, compared to the No Action Alternative, creating no vibration impacts. And, those trucks will focus on Wyoming and Livernois, away from neighborhoods.	1
Impacts - trucks - quality of life	Increased truck traffic will be detrimental to quality of life in the area.	With the Preferred Alternative intermodal truck traffic will follow routings on Wyoming Avenue and on Livernois Avenue, north of the Livernois-Junction Yard. Intermodal truck volumes will be reduced on Livernois and Dagoon, south of the terminal and the Dix/Waterman entrance will be closed.	6
Impacts - trucks - rail and truck traffic	The DIFT Project would significantly increase the rail and truck traffic in and around the proposed Livernois-Junction Yard.	Truck traffic changes with the project are shown in Table 4-34 and train volume changes are shown in Table 4-37. All streets around the terminal are projected to handle the 2030 traffic without congestion.	2
Impacts - trucks - rail line improvements	The DEIS identifies a problem that could limit intermodal growth; that being rail line congestion and conflicts. No solution to this problem is recommended nor were there any discussions of cost, land acquisition problems, or other confounding difficulties.	Rail line improvements included in the Preferred Alternative are listed in Section 3.5 and shown in Figure 3-15.	1
Impacts - trucks - rail lines - grade separations	Alternatives 2 through 4 discuss grade separating Central Avenue. Are other railroad grade separations planned or other modifications to enhance the safe movement of traffic around the terminal area?	No other separations of the rail line and roadways are needed to allow the Preferred Alternative to function safely and efficiently.	1
Impacts - trucks - rail lines - Moterm	Railroad crossings in the area around the Moterm terminal need improvement and will only become more degraded with increased rail activity.	The Preferred Alternative does not include any changes at the Moterm Terminal or Fairgrounds.	5
Impacts - trucks - rail lines - Oak	Are they going to upgrade all the rail lines within the CP Oak terminal area that are feeding into that yard, and not only the train lines but the traffic lines like Evergreen and Wyoming?	The Preferred Alternative does not include any changes at the Oak Terminal only the removal of its intermodal function.	1
Impacts - trucks - rail lines - other traffic	The DEIS projects an overall increase in train traffic (freight and passenger/AMTRAK). Improvements to tracks and related infrastructure are planned under all action alternatives. How will this increase in train activity affect the surrounding communities?	The 2030 intermodal component at the Livernois-Junction Yard growth is ten additional trains per day of an estimated increase of 40. No significant negative effects are anticipated due to the increased intermodal train traffic. And, the other train movements are being studied by other governments than MDOT. Their impacts will be defined in those studies. They are not known today.	1

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - trucks - rail lines - Wyoming and Schaefer	Will there be any change in the way the north/south traffic is affected by the train crossings such as at Schaefer and Wyoming?	No.	1
Impacts - trucks - rail volumes	Has there been any identification of current rail volumes and the potential increase or decrease for each alternative?	Yes. These are presented on Table 4-37 and the introductory text to Section 4.9.	1
Impacts - trucks - roads	Improvements are needed to all roads and viaducts around the Livernois-Junction Yard, including but not limited to, John Kronk, Central, Lonyo, Dragoon, Wyoming, Fort and Livernois.	Dix at Central and Livernois at I-94 will be improved as part of the project. The grade separation of Central from the rail line will also be part of the project and MDOT will take over that portion of Central Avenue from the local jurisdiction. All other roads in the area except Michigan Avenue, I-94, and I-75 are under local government control.	18
Impacts - trucks - roads improved	Will area roads around the terminal, such as, Livernois, Central, John Kronk, and Wyoming be improved?	Dix at Central and Livernois at I-94 will be improved as part of the project. The grade separation of Central from the rail line will also be part of the project and MDOT will take over that portion of Central Avenue from the local jurisdiction. All other roads in the area except Michigan Avenue, I-94, and I-75 are under local government control.	4
Impacts - trucks - roads maintenance	Who is going to fix the roads?	The owner of the road is responsible for its upkeep. In the case of the roads around the Preferred Alternative, MDOT is responsible for Michigan Avenue, I-75 and I-94. It will take over Central Avenue to build the viaduct under the Livernois-Junction Yard. All other roads are controlled by Wayne County, the City of Detroit or the City of Dearborn.	1
Impacts - trucks - roads Moterm	Who will maintain the road improvements to Eight Mile Road that are proposed on page S-31?	The Preferred Alternative does not include any changes at the Moterm Terminal or Fairgrounds. Nonetheless, upkeep of Eight Mile Road is the responsibility of MDOT.	1
Impacts - trucks - timing	The FEIS should phase any changes to Junction yard that result in increased truck traffic to coincide with the completion of the I-75 Gateway Project.	The Gateway Project at the Ambassador Bridge will be complete at about the time the DIFT improvements get underway.	1
Impacts - trucks - viaducts	All railroad viaducts need to be repaired, maintained and well lit with proper drainage.	Viaduct actions in the Livernois-Junction Yard area are the responsibility of either the railroads or the local jurisdictions.	10
Impacts - trucks - viaducts improved	All railroad viaducts need to be repaired or replaced if necessary.	Viaduct actions in the Livernois-Junction Yard area are the responsibility of either the railroads or the local jurisdictions. The owner of the road is responsible for its upkeep. In the case of the roads around the Preferred Alternative, MDOT is responsible for Michigan Avenue and I-94. All other roads are controlled by Wayne County, the City of Detroit or the City of Dearborn.	9

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - trucks - vibration	My concern is about truck traffic. I live one street over from Fort and less than a block from I-75. I already have cracks in my foundation. I'm wondering, if we're going to have all this truck traffic, are they going to help people get their houses stabilized.	MDOT offers basement surveys that document conditions prior to construction if construction is claimed to cause damage. However, this project cannot rectify past problems.	1
Impacts - trucks - volumes	The public roadway network is depicted in the DEIS, but there is no description of truck volumes or truck routes.	Truck volumes are shown in Figure 4-11.	1
Impacts - trucks - weight	I'm concerned about what's going to happen with the intermodal trucks with their weight and their size.	Intermodal trucks are regulated by the state in terms of size and weight.	1
Impacts - trucks - Woodward and Eight Mile Road	Eighteen wheelers traveling on Woodward and Eight Mile are not the kind of vehicles they were designed to carry.	Woodward and Eight Mile Road are state trunklines designed to carry all traffic.	1
Impacts - trucks - Wyoming	Alternatives 3 & 4 in particular increase the levels of truck traffic in Dearborn, especially development of new gates on the western side of the Livernois-Junction Yard.	The Preferred Alternative includes two gates off Wyoming and two off Livernois. These gates will result in changes in truck traffic volumes on Wyoming that are shown in Figure 4-11.	2
Impacts - trucks - Wyoming - capacity	Wyoming is not large enough to accommodate the proposed increase in truck traffic.	The Preferred Alternative includes two gates off Wyoming and two off Livernois. These gates will result in changes in truck traffic volumes on Wyoming that are shown in Figure 4-11.	12
Impacts - trucks - Wyoming - capacity intersection	Wyoming is going to be at or above capacity in 2025, based on the numbers that MDOT provided.	Updated numbers for the Preferred Alternative show Wyoming to be within capacity.	1
Impacts - trucks - Wyoming - Dearborn	Of concern is the potential impact of increased truck traffic in surrounding neighborhoods as well as the shift in trucks to the Dearborn community. The majority of trucks would use newly created west entrances, passing the Eugene Porath neighborhood and the south Dearborn neighborhood located just north of Lapeer Park.	There will be a decrease of intermodal truck traffic in neighborhoods. The houses in the Eugene Porath neighborhood are being purchased and demolished by the city of Dearborn. The gate nearest Lapeer Park is a block away. It will not be impacted by the Preferred Alternative.	1
Impacts - trucks - Wyoming - delays	Delays in Wyoming have important implications for residents in south Dearborn. Also, there's a Dearborn fire station on Wyoming.	The Preferred Alternative includes two gates off Wyoming and two off Livernois. These gates will result in changes in truck traffic volumes on Wyoming that are shown in Figure 4-11.	1
Impacts - trucks - Wyoming - gates	There is concern associated with more truck traffic being generated by a proposed terminal gates on Wyoming.	Comment acknowledged. The Preferred Alternative includes two gates off Wyoming and two off Livernois. These gates will result in changes in truck traffic volumes on Wyoming that are shown in Figure 4-11.	11
Impacts - trucks - Wyoming - PM	Traffic on Wyoming will exacerbate the existing high levels of particulate matter.	Reductions brought by cleaner engines and fuels will greatly reduce particulate matter generated by roads.	2

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - trucks - Wyoming - school	The proposed use of Wyoming Avenue will have an adverse affect on school buses which use Wyoming.	School buses commonly travel on arterial streets with truck traffic.	3
Impacts - trucks - Wyoming - school buses	A new elementary school and community center have been built on Wyoming Avenue and Wyoming is the main school bus route.	School buses commonly travel on arterial streets with truck traffic.	4
Impacts - trucks - Wyoming - school truck traffic	Most of the alternatives use Wyoming, which is used to bus our kids to local schools. Use of Wyoming is totally detrimental to our neighborhood and will hamper economic growth.	School buses commonly travel on arterial streets with truck traffic. Wyoming is an arterial highway serving a commercial/industrial area. Economic growth is forecast to be improved by implementing the Preferred Alternative.	1
Impacts - trucks - Wyoming - shifts from Livernois	The shift of the majority of the trucks from the current eastern entrances to the west directly affects the Arab-American and Muslim populations there.	The presence of a nearby concentration of key populations of all ethnic origins at and around the area of the Preferred Alternative is covered in Section 4.3. The intermodal traffic of the Preferred Alternative is not targeted to affect any population.	2
Impacts - tax base loss	The proposed project would displace existing residents and businesses and remove property from the city and county tax rolls.	The economic effects of the Preferred Alternative are documented in Section 4.5. The loss of property taxes is forecast to be more than offset by the positive economic effects of the Preferred Alternative.	2
Impacts - tax base loss - business	The DIFT would result in the loss of existing businesses in Detroit and Dearborn and would be replaced with rail-owned operations that would not produce tax revenue. MDOT repeatedly mentions that jobs and businesses won't locate out of the area, but this is not supported by any evidence.	The economic effects of the Preferred Alternative are documented in Section 4.5. Businesses that would be relocated by the Preferred Alternative are expected to relocate in the area defined in Section 3.4.	1
Impacts - tax base loss - economic effects	Given that the railroads don't pay state taxes and taxpaying businesses and residents will be displaced by the DIFT, how does the DIFT benefit taxpayers?	The economic effects of the Preferred Alternative are documented in Section 4.5. Overall, the Preferred Alternative is forecast to create by 2030 1,542 new jobs in the area around the terminal. And, Detroit, Dearborn, other local governments and the state of Michigan are expected to realize significant gains in taxes.	2
Impacts - tax base loss - funding	How will the DIFT be paid for given that the railroads don't pay state taxes?	The costs of most transportation programs are usually financed 100% by public/government funds. In the case of the Detroit Intermodal Freight Terminal Project, government/public funds will cover about 65% of the costs and the railroads 35%.	2
Impacts - tax base loss - incorrect	This project doesn't generate money or the tax dollars.	The Preferred Alternative does generate tax dollars; see Section 4.5.	1
Impacts - tax base loss - Moterm	I live in Ferndale and am concerned about the negative impact of the DIFT Project at the Fairgrounds. It will substantially lower the base.	The Preferred Alternative does not include any changes at the Moterm Terminal or Fairgrounds.	1

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Impacts - tax base loss - SW Detroit	With the net loss of jobs and tax base in Southwest Detroit, the net gain of jobs and tax base must be in Southwest Detroit.	There will be a net gain of jobs and tax base; see Section 4.5.	1
Impacts - tax increase	We don't need increased taxes to keep up with fire and police protection.	Comment acknowledged.	1
Impacts - tax services - cost	Local tax dollars will be required for police, fire, HAZMAT and DPW personnel.	With the Preferred Alternative, jobs will increase and local tax revenues will increase; see Section 4.5.	3
Impacts - tax services cost - Moterm	Expanding the CN Yard would place financial strain on the local community by requiring additional public safety and public works resources.	The Preferred Alternative does not include any changes at the Moterm Terminal or Fairgrounds.	4
Impacts - tax - tipping fees	Intermodal lift tipping fees could be earmarked for specific community improvement/enhancement projects.	"Tipping fees" are not required. The railroads will directly pay for about 35% of the capital costs of the Preferred Alternative.	1
Impacts - wetlands	The DEIS estimates that between 0 and 0.08 acres of wetland impact will occur. The functions and values of impacted wetlands should be defined in the EIS and a permit will be required under Part 303 Wetlands Protection.	Section 4.12.2 states that the wetland impacted (0.1 acres) has minimal storm water storage capacity, minimal filter capacity, and no wildlife value. A general permit to address this impact will be obtained under Part 303 of P.A. 451.	1
Impacts - wetlands - correction	Page 1-66 under State Permits should read Part 303 "Wetlands Protection".	This correction has been made.	1
Mitigation	How can the impacts of the alternatives presented in the DEIS be evaluated without inclusion of planned mitigation for each alternative?	Mitigation is covered in Section 5.	1
Mitigation - air mitigation	As part of the Community Benefits package, air quality mitigation that incorporates environmental best practices must be implemented.	Mitigation is covered in Section 5. No negative air quality impacts are predicted with the Preferred Alternative.	30
Mitigation - air mitigation - retrofit	Will stationary equipment in the terminals like lift machines be retrofitted with newer, cleaner technology? How will MDOT mandate that the railroads comply with the newest EPA recommendations?	The EPA regulations on diesel fuel content and new diesel engines will affect terminals (off-road) and on-road equipment (intermodal trucks). There will be no control over the trucks that use the terminal. All vehicles will be subject to idle controls while at the terminal.	3
Mitigation - air monitoring	There needs to be a method and plan for constant monitoring and enforcement of air quality standards.	Enforcement of air quality rules and regulations is the responsibility of the Michigan Department of Environmental Quality and the U.S. EPA. SEMCOG plays a role by working with these agencies to set "budgets" to guide the region to attainment of National Ambient Air Quality Standards. The DIFT Project has been found to conform to the Clean Air Act (Section 4.8.7).	10
Mitigation - buffer	The perimeter land around the entire terminal should be buffered and landscaped.	The design of the Preferred Alternative includes a buffer as described in Sections 4.9, 4.15 and 4.19.	17



## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Mitigation - buffer - impacts	The possible disruption of pedestrian and bicycle traffic along newly planned recreational pathways such as Detroit Dearborn Greenway should be assessed.	Such impacts are assessed and documented in Section 4.2.2.	1
Mitigation - buffer - eliminating roads	All action alternatives propose relocating John Kronk and closing Lonyo and, presumably, other nearby local streets. This has the potential for causing a disruption to non-motorized activity (pedestrians and bicyclists). Additional planned remediation should be provided.	Eliminating roads crossing the Livernois-Junction Yard is critical to the function of the yard and the safety of motorists. Traffic now using Lonyo that will be rerouted to Central Avenue will take an additional two minutes, but no trains will be encountered, eliminating the potential for severe crashes, which have occurred. Counts did not find pedestrians and bicyclists using Lonyo and crossing the railroad tracks.	1
Mitigation - buffer - landscaping	A buffer should be built to separate people and animals from equipment at the terminal.	Security walls proposed to be built around the terminal will accomplish this objective.	1
Mitigation - buffer - Livernois & Wyoming	Add beautification to the Livernois and Wyoming exits off of I-94 to mitigate heavy truck usage.	This proposal is not part of the Preferred Alternative.	1
Mitigation - buffer - maintenance	There should be a commitment to maintain the perimeter land buffer with a dedicated revenue source.	The design of the Preferred Alternative includes a buffer as described in Section 4.2. The maintenance of the buffer will be local government's responsibility.	4
Mitigation - buffer - south side	The perimeter around the entire rail yard should be buffered, landscaped and greened sufficiently to mitigate air and noise impacts.	The design of the Preferred Alternative includes a buffer as described in Sections 4.15 and 4.19. The maintenance of the buffer will be local government's responsibility. A buffer is not needed on the south side of the Preferred Alternative from one block east of Lonyo west to Wyoming Avenue because of the adjacent industrial uses and the Woodmere Cemetery.	7
Mitigation - Community Benefits Agreement	A Community Benefits Agreement is needed.	See Section 5 for mitigation.	46
Mitigation - Community Benefits Agreement - access	A formal written agreement is needed to ensure that there will be no truck access along the existing track that runs along the Springwells Village community.	The design of the Preferred Alternative does not include this type of access.	1
Mitigation - Community Benefits Agreement - awaits development	What policies or procedures have been developed to maintain properties after they are improved?	The railroads will be responsible for terminal maintenance. An agreement will be put in place after the Record of Decision. Central Avenue and I/94/Livernois interchange will be maintained by MDOT. All other roads, improved or not, are the responsibility of units of local government.	1

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Mitigation - Community Benefits Agreement - buffer	Any proposal must contain an adequate maintenance plan for the perimeter along the yards with dedicated revenue sources. A written agreement with a timeline should be developed and signed outlining maintenance responsibilities.	The design of the Preferred Alternative includes a buffer as described in Sections 4.9, 4.15 and 4.19. The maintenance of the buffer will be local government's responsibility.	1
Mitigation - Community Benefits Agreement - issues	We need to have public resources or private resources devoted to paving the facility, providing a buffer, and better lighting.	These issues are documented in Sections 3.4 (paving); Sections 3.4, 4.9 and 4.15 (buffers); Section 4.19 (landscaping); and, Section 4.20 (lights).	1
Mitigation - Community Benefits Agreement - mitigation plan	With the No Action Alternative, the opportunity to promote local economic development and address long-overdue infrastructure improvements will be lost for years, if not forever.	The No Action Alternative is not the Preferred Alternative. The mitigation plan addresses, to the extent possible, such issues that are "long-overdue."	1
Mitigation - Community Benefits Agreement - railroads	"The Enhancement Project" done a few years ago resulted in a chain link fence and some internal configuration in the yard, neither of which benefited the community a great deal.	The "enhancement project" was not MDOT-sponsored. It was a railroads' project.	2
Mitigation - Community Benefits Agreement - shift intermodal	It is mentioned that the other existing terminals will continue to operate, serving different railroad business. What assurances are there that they will not revert to intermodal in the future?	The plan is to shift intermodal from all terminals but CN/Moterm to the area of the Livernois-Junction Yard. The Pre-Development Plan Agreement between MDOT and the railroads prevents the duplication of intermodal facilities.	1
Mitigation - Community Benefits Package	This is still very much about the freight companies. There is nothing in this that says, yes, we understand the concerns of the community.	The project has been refined to address community concerns, including mitigation, to the extent possible.	1
Mitigation - construction	Special attention should be given to movement of soil particles to surface waters during construction	Section 5.3 details soil erosion and sedimentation control.	1
Mitigation - construction AQ	There should be a plan to address construction emissions, including such actions as: retrofitting off-road equipment, using ultra-low sulfur diesel fuels for all equipment, limiting the age of on-road vehicles using construction to 1998 and newer vehicles, dust control plans, diesel particulate traps and oxidation catalysts, and use of existing power sources or clean fuel generators rather than temporary generators.	Such suggested measures are covered in Sections 4.8.7. For the PM2.5 and PM 10 hot-spot analysis, construction estimates were made and compared to the other terminal development activities, such as closing Lonyo and reducing truck traffic on Kronk to ensure that the construction activities do not contribute to violations of the standards.	2
Mitigation - context sensitive design	The DIFT provides an opportunity to implement a project that could act as a model of "context sensitive design" for the state and country. More work is needed.	Context Sensitive Solutions guide all MDOT-sponsored designs. The DIFT Preferred Alternative is, therefore, covered by three principles if the project goes forward to design.	4
Mitigation - general	Nothing was said about mitigation. Is there a mitigation plan for Southwest Detroit?	Mitigation is covered in Section 5.	1

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Mitigation - jobs - average pay	I do not believe there will be better jobs.	Comment acknowledged. The average pay of permanent jobs associated with the Preferred Alternative is \$40,000 per year (2008 dollars). These data are included in Section 4.5.	1
Mitigation - jobs - by community	When calculating net jobs loss/gained, the DEIS does not specify the number of jobs lost or gained by the community and should. It should also indicate what percentage of the new jobs are likely to be held by residents of the affected areas.	The jobs by community are shown in Table 4.19. The issue of "local" jobs is addressed in Section 5.	1
Mitigation - jobs - Detroit area	As a result of the changes that the DIFT introduces, how many blue-collar jobs will be created for City of Detroit residents? How many white-collar jobs?	The specific number of permanent jobs for the Detroit area in the Preferred Alternative is 2,359, as documented in Section 4.5.2.	1
Mitigation - jobs - economic effects	For the DIFT to go forward in a meaningful direction, there has to be a clear cut way to ensure that the majority of jobs translate into jobs for people in the metropolitan Detroit area.	The economic effects of the Preferred Alternative are included in Section 4.5.	10
Mitigation - jobs - local	A percentage of the jobs created should accrue to local residents and a job training program should be developed for local residents.	The economic effects of the Preferred Alternative are included in Section 4.5. The need for "local" jobs and job training of local residents is addressed in Section 5.	10
Mitigation - jobs - minority	A local minority, women and small business utilization program should be developed to increase participation of these businesses in all phases of the DIFT Project.	The need for minority participation in jobs and training is addressed in Section 5.	4
Mitigation - jobs - mitigation plan	A percentage of the new jobs should be available to people who live in the area.	The economic effects of the Preferred Alternative are included in Section 4.5. This issue is addressed, to the extent possible, in Section 5.	3
Mitigation - jobs - permanent	What is the expectation of the average salary of new jobs?	The average pay of permanent jobs associated with the Preferred Alternative is \$40,000 per year (2008 dollars). These data are included in Section 4.5.	1
Mitigation - jobs - programs	What plans or proposals will be generated to ensure that the stated number of permanent and construction jobs will be available for city of Detroit residents? Such a plan would serve to mitigate the burden placed upon the City and its residents.	This issue is addressed, to the extent possible, in Section 5.	9
Mitigation - lighting	Improved lighting that is screened from adjacent residential neighbors is needed around the terminal.	Planned directional lighting is discussed in Section 4.20.	2
Mitigation - limits to intermodal	There should be no further incremental expansion of the intermodal yard outside of the negotiated boundary such as at Ward Bakery.	Expansion beyond the limits of the Preferred Alternative at the Livernois-Junction Yard is not part of the Preferred Alternative. While private companies develop their businesses at locations which they choose, such developments are eventually controlled by local units of government.	7

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Mitigation - limits to intermodal - Central Depot	No intermodal development should occur outside of Livernois-Junction yard at the Michigan Central Depot or former Ward Bakery.	Intermodal development at the Michigan Central Depot is not part of the Preferred Alternative. Nonetheless, MDOT cannot limit private companies from developing their businesses at locations they prefer. Such developments are controlled by local units of government.	7
Mitigation - noise mitigation	Who is going to pay for sound barriers? The businesses that now exist should pay.	MDOT will pay for noise buffering.	1
Mitigation - noise mitigation	Barrier walls that mitigate noise impacts must be developed appropriately.	Noise mitigation is required on FHWA-sponsored projects, where criteria are exceeded, and will be implemented for this project as is noted in Section 4.9. Noise mitigation will be integrated into the overall security and buffering of the terminal.	8
Mitigation - noise mitigation - attenuate noise	The only wall at Livernois will be a security wall to protect the DIFT.	That security wall will also block/attenuate noise.	1
Mitigation - noise mitigation - barrier	The green sheet included at the end of Section 5 of the DEIS notes that barrier walls and other elements of each terminal's design are covered in the Memorandum of Understanding between the railroads and MDOT. Yet, the term "barrier walls" never appears in the signed MOU.	The Pre-Development Plan Agreement, in Appendix F, indicates that walls are the responsibility of government. Section 5 addresses walls that attenuate noise in terms of MDOT participation.	1
Mitigation - noise mitigation - buffer	Why is there no barrier wall on the south side of the terminal?	The design of the Preferred Alternative includes a buffer as described in Sections 4.9, 4.15 and 4.19. The maintenance of the buffer will be local government's responsibility. A buffer is not needed on the south side of the Preferred Alternative from one block east of Lonyo west to Wyoming Avenue because the terminal is adjacent to industrial uses, some of which require continued rail service, and the Woodmere Cemetery, which do not represent a security or noise-sensitive issue.	1
Mitigation - noise mitigation - commerce violation	Rail activity, particularly train assembly, should be limited at night.	Such limitations cannot be imposed as they are a violation of interstate commerce.	1
Mitigation - noise mitigation - entrance	This entrance on Livernois should be a barrier wall because of sound effects.	There must be an opening at the entrance to a terminal so trucks can get in and out.	1
Mitigation - noise mitigation - "impact noise"	An expanded noise study should address "impact noise" generated by rail yard activities and installation of noise barrier walls at all locations where noise levels impact residential areas.	The noise analysis meets all federal and state requirements. Mitigation of noise is associated with walls that are part of the design of the Preferred Alternative. There is no need for the project to mitigate pre-existing conditions although the new walls will do so where they are placed.	1

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Mitigation - noise mitigation - Moterm	How will noise impacts be mitigated at the Moterm terminal?	The Preferred Alternative does not include any changes at the Moterm Terminal or Fairgrounds.	6
Mitigation - noise mitigation - Moterm walls	Noise walls don't work. Within a half-block of the Ferndale Yard I can hear the train. The loaders are noisier than trucks.	Walls work for attenuating certain noise at near-to-wall receptors but are less effective at greater distances from the wall. The Preferred Alternative does not include any changes at the Moterm Terminal or Fairgrounds.	1
Mitigation - noise mitigation - Oak	Once the barrier wall is up at Oak on the north side, who will be responsible for maintaining it?	The Preferred Alternative does not include any changes at the Oak Terminal except removal of intermodal activity.	1
Mitigation - noise monitoring	Noise monitoring analysis needs to happen in an ongoing basis and there should be remediation measures if thresholds are exceeded.	Noise levels are estimated in advance of a project and appropriate measures are taken when the project is built consistent with commitments made in this FEIS.	1
Mitigation - sustainable	The latest sustainable environmental practices must be incorporated into the development of the project.	The design of the Preferred Alternative includes paving the yard for operational and water quality purposes, detention of storm drainage and landscaping as described in Section 4.19. The railroads will be responsible for improvements on the terminals.	6
Mitigation - sustainable - details	There is a provision in the Los Angeles Community Benefits Agreements on green building principles.	Comment acknowledged.	1
Mitigation - sustainable - fuel cells	Will the State consider fuel cell operated railroad systems for this study?	Railroads will take advantage of innovations as they are proven and cost efficient. Fuel cell technologies today apply primarily to electrified, not diesel, rail systems, and have value in passenger applications where operations are stop-and-go to take advantage of regenerative braking.	1
Mitigation - SW Detroit Plan	The city of Detroit, MDOT and SEMCOG should work with community and transportation stakeholders to develop a land use and transportation plan for Southwest Detroit.	MDOT is supportive of such efforts at the local level. Land use is under the control of the cities of Detroit and Dearborn, where the terminal of the Preferred Alternative is located. SEMCOG develops the regional transportation plan, based on input from local jurisdictions and in cooperation with MDOT.	15
Mitigation - truck routes - analysis	There should be an analysis of truck generators and routes to remove truck traffic from residential and neighborhood commercial areas.	MDOT has attempted, throughout the DIFT study, the development of the Preferred Alternative to be responsive to community needs by: 1) positioning terminal gates at both east and west ends of the terminal to move intermodal traffic out of the surrounding neighborhood; 2) designing the gate at Livernois so that trucks can only enter and exit to the north; 3) improving the I-94/Livernois interchange to support use of Livernois, rather than Central and other neighborhood streets; and, 4) improving the intersection of Dix and Central.	10
Mitigation - truck routes - analysis plan	The 2004 revised Master Plan of Policies directs the City to "establish and enforce designated truck routes" (Policy 8.1, 1-18).	Comment acknowledged.	1

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Mitigation - truck routes - enforcement	There needs to be enforcement of truck routes. How will this be accomplished?	Enforcement of truck routes is a local policing matter. Public roads are for public (including truck) use, unless there is a defensible reason otherwise to restrict use.	5
Mitigation – truck routes - freeway connection	The number of freeway exits should be limited to keep trucks off of local neighborhood streets.	The Preferred Alternative will design the entrance to the Livernois-Junction yard from Livernois so that trucks can only enter and exit to the north, reducing intermodal truck traffic on Livernois and Dagoon to the south. At the west end of the yard, trucks will travel to/from I-94 via Wyoming and to I-75 via Wyoming and Dix/Schaefer or one of several similar routes. It is also contemplated in the Detroit River International Crossing Study that the Livernois/Dagoon interchange at I-75 will be closed, thereby inhibiting trucks to and from the south from accessing I-75 via Livernois Avenue.	4
Mitigation – truck routes - gates	Traffic and safety infrastructure improvements must be better addressed. Two gates can be included, one on the east and one on the west. Truck routes must not lead through residential neighborhoods.	The Preferred Alternative includes gates on arterial roads on the east and west of the Livernois-Junction Yard to ensure that intermodal truck routes do not go through residential areas.	3
Mitigation - truck routes - I-75	Have you considered a truck way from I-75 on the east near I-96 all the way along the railroad tracks west to either Wyoming or Miller Street?	No, because there is no opportunity to connect such a truck roadway to I-75 due to the many ramps and geometric conditions in that area. A truck-only road from the I-75/Springwells area along the railroad tracks was considered early in the DIFT study, but it was rejected by the community as being too intrusive.	1
Mitigation - truck routes - Moterm	The potential expansion of the Canadian National Terminal into the State Fairgrounds should not interfere or conflict with the City's directive to regulate truck traffic.	The Preferred Alternative does not include any changes at the Moterm Terminal or Fairgrounds.	1
Mitigation - truck routes - Vernor	All the trucks are going down Vernor Highway.	Vernor will not be a logical route for intermodal trucks using the Livernois-Junction Yard under the Preferred Alternative. It should be noted there are many other non-intermodal trucks in the area that use Vernor, over which this project has no control.	1
Mitigation - vibration impacts/mitigation	The DIFT would significantly increase vibration impacts on local schools and neighborhoods, but proposes no mitigation.	Through analysis it was found there will be no significant vibration impacts that would need to be mitigated.	1

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Mitigation - vibration mitigation	There is no proposed vibration mitigation under any Action Alternative. Vibrations can do major structural damage to buildings.	Vibrations analysis in Section 4.9.3 found vibration levels in the area only get to the level of annoyance at one measured location. Annoyance levels are well below structural damage levels. MDOT offers basement surveys to document the existing condition of a structure prior to construction. The purpose of such a survey is to document conditions prior to construction to determine whether construction vibration causes damage, if a claim of such is made. MDOT does fix damage, when and where it is properly documented.	1
Mitigation - vibration mitigation - Beard School	The DEIS notes a negative impact on noise levels which reach an annoyance level only at the Beard School but proposes no mitigation to address this negative impact.	The vibration levels noted were from rail operations and a variety of other equipment or activity in the area, such as electric transformers and air conditioning units. MDOT has no responsibility to mitigate such vibration.	3
Mitigation - vibration mitigation - survey	It is stated that MDOT will offer basement surveys in areas where vibration from construction could damage structures, but does not offer to fix the damage.	The purpose of such a survey is to document conditions prior to construction to determine whether construction vibration causes damage, if a claim of such is made. MDOT does fix damage, when and where it is properly documented.	1
Public Involvement - ads	The DIFT EIS meetings need to be better publicized.	Section 7.2 explains the efforts made to inform the public. The mail list grew to 25,000 by the Public Hearing. A Local Advisory Council, whose job it was, in part, to "get the word out" to its constituencies met 30 times, getting notifications of each meeting. An "800" number was available 24/7. Ads were placed in several newspapers announcing all public meetings. MDOT has provided project documentation on its web site <a href="http://www.michigan.gov/mdot">http://www.michigan.gov/mdot</a> , which is frequently updated.	5
Public Involvement - ads - Highland Park	Legacy News in Highland Park was not contacted to announce meetings.	While this comment is acknowledged, Section 7.2 explains the efforts made to inform residents. The mail list grew to 25,000 by the Public Hearing. Anyone who came to a meeting and signed in was contacted directly of future meetings. Ads were placed in several newspapers announcing all public meetings. MDOT provides project documentation on its web site <a href="http://www.michigan.gov/mdot">http://www.michigan.gov/mdot</a> , which is frequently updated.	2
Public Involvement - cultural outreach	The public outreach materials need to be presented in a more simple form.	MDOT provided information in English, Arab and Spanish, had interpreters at all public meetings, and offered to meet with any person to read/interpret project documents, if such service were needed.	4

## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Public Involvement - cultural outreach - residents	Language and cultural barriers may prevent effective participation in the decision making process including public notice and comment procedures.	MDOT provided information in English, Arab and Spanish, had interpreters at all public meetings, and offered to meet with any person to read/interpret project documents, if such service were needed.	1
Public Involvement - governance	There should be local community representation on a public project governing board as an outcome of the Community Benefits Agreement.	Details of governance are in the Pre-Development Plan Agreement in Appendix F.	10
Public Involvement - governance - languages	There needs to be a local staff person to assist the community as the project goes forward.	Comment acknowledged. MDOT and consultant staff persons have been available throughout the course of the study (see meetings list in Section 7.2). MDOT provided information in English, Arab and Spanish, had interpreters at all public meetings, and offered to meet with any person to read/interpret project documents, if such service were needed.	1
Public Involvement - meetings after Public Hearing	MDOT should be encouraged to continue a transparent process that invites community input.	Comment acknowledged. MDOT and consultant staff persons have been available throughout the course of the study (see meetings list in Section 7.2). MDOT provided information in English, Arab and Spanish, had interpreters at all public meetings, and offered to meet with any person to read/interpret project documents, if such service were needed.	1
Public Involvement - meetings after Public Hearing - final meeting	MDOT should hold an additional round of public hearings when a preferred alternative is identified.	A final meeting in the planning/environmental stage is to be held after approval of this FEIS.	1
Public Involvement - meetings - comments	Will all of the written and spoken comments be considered and will everyone present at the public meeting get a copy of them?	All comments have been considered and are responded to herein. The comments received at the Public Hearing, subsequently from agencies, and from the public up to the close of the commenting period on August 16, 2005, are available at the locations listed in the Preface to this FEIS and at MDOT web site <a href="http://www.Michigan.gov/MDOT">www.Michigan.gov/MDOT</a>	2
Public Involvement - meetings - format	The structure of the recent public meetings should be used for all meetings wherein there's a public presentation, with an opportunity for public comments together with information stations. Community organizations with a strong interest in the EIS should be allowed to present information.	Comment acknowledged. The public has presented its information and permitted to distribute documents at all DIFT meetings.	1
Public Involvement - meetings - Highland Park	When did the presentation to the Highland Park Planning Commission take place?	MDOT presented to the Highland Park Planning Commission on May 5, 2005 in the evening.	2
Public Involvement - meetings - LAC membership	MDOT should designate a seat on their Local Advisory Council for a representative of the City Planning Commission.	The opportunity was afforded and a Planning Commission representative participated in the Local Advisory Council.	1



## DIFT Comments on DEIS and Responses

Response Category	Generalized Comment	Response	#
Public Involvement - meetings - request	Detroit City Council resolved June 25, 2003 and approved by waiver of the Mayor's Office on July 1, 2003, to respectfully request MDOT to host as many public meetings in the affected community as is required and provide written materials widely distributed to ensure community members understand this project.	Comment acknowledged and adhered to. Please see the list of meetings in Section 7.2.	1

## SECTION 8

### LIST OF PREPARERS

#### 8.1 Federal Highway Administration

**James R. Cramer, Planning Program Manager/Air Quality Specialist**, Federal Highway Administration. Bachelor of Civil Engineering, The Ohio State University. Thirty-eight years' experience in transportation planning, engineering and air quality analysis.

**Mary Finch, Civil Rights Program Manager**, Federal Highway Administration (FHWA). B.S. in Management, Northwood University; A.A.S. degrees in Accounting and Human Services, University of Alaska Anchorage; Master Compliance Administrator (MCA) Certification, Morgan State University. Twenty-four years in federal government including seven in Department of Defense Civil Engineering, 17 in Department of Transportation with ten in Federal Aviation Administration and seven in FHWA.

**Ryan Rizzo, Major Project Manager**, Federal Highway Administration. B.S. in Civil Engineering, Michigan State University; M.S. Engineering, University of Michigan. Associate Certificate in Project Management – ESI and The George Washington University School of Business. Twenty-four years' experience in transportation planning and engineering.

**David T. Williams, Environmental Program Manager**. B.A. in Environmental Policy and Technology, University of Michigan; M.P.A. Environmental Policy & Natural Resources Management, University of Washington; 19 years of environmental experience (nine of those years include NEPA).

#### 8.2 Michigan Department of Transportation

**Larry Karnes, Freight Policy Specialist**. B.S. in Geography, Michigan State University; M.A. in Transportation Geography, Western Michigan University. Two years' experience teaching Geography at The Ohio State University. Three years' experience with the federal government. Four years experience as Chief Transportation Planner for the East Central Michigan Planning & Development Regional Commission. Twenty-six years' experience in freight transportation planning with MDOT. Managed original conceptual planning effort.

**Lori Noblet, Environmental Coordinator**. B.S. in Political Science, University of Wyoming; Masters in Urban Planning (MUP), Michigan State University; 21 years of experience with MDOT in preparing environmental impact statements and assessments.

**Robert Parsons, Public Hearings Officer**. B.S. in Interpersonal and Public Communications, Central Michigan University. Eighteen years of experience in communications at MDOT. Coordination of the public involvement effort.

**Terry Stepanski, Project Manager**, B.S. in Civil Engineering, Michigan Technological University. Registered Professional Engineer in the State of Michigan. Twenty-three years of experience in all phases of Highway Development, Design, Construction and Maintenance at MDOT. Review of the entire EIS.

**William J. Swagler, Right-of-Way Estimate.** B.A. in Business Management, Northwood University. Cost Estimator and Licensed Real Estate Appraiser, 29 years' experience with the MDOT, Real Estate Division. Developer of the Conceptual Stage Relocation Plan.

***Other MDOT Personnel Assigned to this Project:***

Mohammed Alghurabi, initial project manager  
Michael Anglebrandt, Project Area Contamination Survey review  
Geraldyn Ayers, environmental review  
Lloyd Baldwin, cultural resources review  
Margaret Barondess, environmental review  
Richard Bayus, indirect and cumulative effects  
Sue Datta, Metro Region representative, EIS review  
Jeff Edwards, Metro Region representative, planning review  
Tom Hanf, air quality and noise analysis review  
Heather Hicks, contaminated site analysis review  
Catherine Jensen, traffic review  
Greg Johnson, Metro Region Engineer  
Amy Lipset, traffic review  
Bethany Matousek, stormwater  
Kim Moody-Holmes, contaminated site analysis  
Lori Noblet, EIS review and community impact analysis review and environmental justice  
Sherry Piacenti, real estate  
Douglas Proper, mitigation review  
Kelly Ramirez, Conceptual Stage Relocation Plan  
James Robertson, archaeological effects  
Dave Ruggles, archaeological review  
Dave Schuen, threatened and endangered species review  
Frank Spica, noise analysis review  
Richard Wolinski, ecology  
David Wresinski, Division Administrator  
Ulrika Zay, coastal resources  
Andrew Zeigler, project review  
Tom Zurburg, noise analysis review

### **8.3 Consultants Disclosure Statement**

The consultants performing the analysis for this environmental document have no financial or other interest in the outcome of this project, in accordance with Council on Environmental Quality Regulation, 40, C.F.R. 1506.5(c) (1999).

### **8.4 Consultant Team**

**Joseph C. Corradino, Project Manager,** The Corradino Group. B.C.E. Villanova University; M.S.C.E., Purdue University. Forty-one years of project management and environmental experience. Principal author of EIS and quality control on supporting Technical Reports.

**Jim Hartman, Traffic Projections and Analysis,** The Corradino Group, B.S.C.E, Michigan State University. Fifteen years of experience in civil engineering planning with emphasis on traffic analysis. Traffic Report.

**Richard Ray, Transportation Planner**, The Corradino Group, B.A., University of Iowa; M.S. Urban and Regional Planning, University of Iowa. Ten years of experience in transportation planning and NEPA documentation.

**Ted Stone, Environmental Manager**, The Corradino Group. B.A., Northwestern University. More than 32 years experience in preparation of environmental documentation. Noise Technical Report, Air Quality Technical Report.

**Michael Tackett, Senior Environmentalist**, The Corradino Group, B.S. and M.S. Forestry, University of Kentucky. Twenty-eight years of experience in geology, soils, and contamination. Project Area Contamination Survey.

**Mark Butler, Planner**, The Corradino Group, B.A., Boston College; M.S. Planning, Florida State University; M.P.A., Florida State University. More than seven years experience in land use and development planning and transportation planning. Economic Impact Technical Report.

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**John Freeland, Wetland Analysis**, Tilton & Associates, Inc., Ph.D., PWS. B.S. Grand Valley State University; M.S. University of New Hampshire; Ph.D. North Dakota State University. Seventeen years of wetland and integrated resource assessment. Wetlands Report.

**Deborah Schutt, Socioeconomic Analysis**, Schutt and Company; B.A. Valparaiso University; M.S. Urban Planning Wayne State University. Twenty-nine years of management and planning experience.

**Randy Henke**, Alfred Benesch & Company, B.S. University of Wisconsin-Madison. Twenty-nine years experience in railroad engineering, planning and operations both internationally and domestically. Engineering Concepts Report.

**Michael Kunz**, Alfred Benesch & Company, B.S. Marquette University. Five years railroad track layout and design. Engineering Concepts Report.

**Doug Strauss, Engineer**, Alfred Benesch & Company, B.S.C.E., Michigan Technical University. Eighteen years of civil and roadway design experience. Engineering Concepts Report.

**Phil Walsh**, Alfred Benesch & Company, B.E. University of Canterbury, New Zealand. Twenty-three years experience in railroad engineering and management. Engineering Concepts Report.

**Terry Campbell**, Analytical Planning Services, B.A., M.A., and M.U.A., Wichita State University, Ph.D., University of Southern California. Thirty-one years regional economic and development planning. Economic Impact Technical Report.



## **SECTION 9**

# **DISTRIBUTION LIST**

The following is a list of agencies, organizations, persons and organizations to whom the FEIS was sent:

### **Federal Agencies**

Advisory Council on Historic Preservation  
Environmental Protection Agency, Administrator, Washington, D.C.  
Environmental Protection Agency, Region V  
Federal Aviation Administration  
Federal Emergency Management Agency  
Federal Railroad Administration  
Federal Transit Administration  
U.S. Army, Corps of Engineers  
U.S. Department of Agriculture  
U.S. Department of Agriculture, Natural Resource Conservation Service  
U.S. Department of Health and Human Services, Center for Disease Control and Prevention,  
National Center for Environmental Health  
U.S. Department of Homeland Security  
U.S. Department of Housing and Urban Development, Area Director  
U.S. Department of the Interior, Fish and Wildlife Service

### **State Agencies**

Michigan Department of Agriculture  
Michigan Department of Community Health  
Michigan Department of Environmental Quality  
Michigan Department of History, Arts and Library, State Historic Preservation Office  
Michigan Department of Labor and Economic Growth  
Michigan Department of Natural Resources  
Michigan Economic Development Corporation  
Michigan Environmental Science Board  
Michigan State Fairgrounds

### **Local Jurisdictions and Agencies**

Michigan United Conservation Clubs, Inc.  
Sierra Club  
Clean Water Action, Michigan  
Michigan Environmental Council  
City of Detroit  
Detroit Department of Transportation  
City of Dearborn  
City of Ferndale  
Oakland County  
Southeast Michigan Council of Governments (SEMCOG)  
Oakland County Commission  
Wayne County Executive

Wayne County Commission  
Wayne County Road Commission  
State Senator Hansen Clarke, District 1  
State Senator Irma Clark-Coleman, District 3  
State Senator Samuel Thomas, III, District 4  
State Senator Tupac Hunter, District 5  
State Senator Gilda Jacobs, District 14  
State Representative Fred Durhal, District 6  
State Representative Gabe Leland, District 10  
State Representative Rashid Tlaib, District 12  
State Representative Gino Polidori, District 15  
State Representative Ellen Lipton, District 27  
U.S. Senator Carl Levin  
U.S. Senator Debbie Stabenow  
U.S. Representative Carolyn Cheeks Kilpatrick  
U.S. Representative John Conyers, Jr.  
U.S. Representative Sander Levin  
U.S. Representative John Dingell

**Other**

CSX  
Canadian National Railroad  
Canadian Pacific Railway  
Norfolk Southern Railroad  
Ford Motor Company  
DaimlerChrysler  
General Motors  
Community Action Against Asthma  
Detroit Intermodal Freight Terminal Local Advisory Council and Committee Members  
Ziibiwing Cultural Society, The Saginaw Chippewa Indian Tribe

**Commenters**

All those making substantive comments on the DEIS will receive a copy of the FEIS.

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