

# FAXED COMMENTS

# COMMENTS

Public input is very valuable. Please let us know your concerns regarding the I-94 Rehabilitation Project in the City of Detroit, Michigan. Each comment will be shared with all the members of the study team for their consideration and will be included in the official transcript of the public hearing.

Comments should be postmarked or electronically dated on or before Wednesday, March 21, 2001

I AM CONCERNED THAT THE CURRENT PLAN WILL THREATEN THE QUIET AND ISOLATED QUALITY OF LIFE THAT MY NEIGHBORS AND I NOW ENJOY ON FOURTH STREET. COULD THIS PLAN BE CHANGED WHEREBY THE WEST BOUND I-94 SERVICE DRIVE FOLLOWS ALONG ANTOINETTE AND HOLDEN? SOUTH BOUND THIRD COULD THEN TURN EAST AT YORK. THIS PLAN WOULD HAVE LESS IMPACT ON EXISTING HOMES AND BUSINESSES, SAVE MONEY, AND HELP KEEP THE INTEGRITY OF OUR NEIGHBORHOOD INTACT.

(OPTIONAL)

NAME DANIEL CIOCHELLI  
(Please Print)

DATE 3-15-01

ADDRESS 5822 FOURTH STREET

CITY DETROIT

STATE MI

ZIP 48202

Please deposit your comments in the box at meeting site or mail, fax, e-mail comments to:

José A. López, Public Hearings Officer  
Bureau of Transportation Planning  
Michigan Department of Transportation  
P.O. Box 30050, Lansing, MI 48909  
Fax: (517) 373-9255  
e-mail: [lopezjos@mdot.state.mi.us](mailto:lopezjos@mdot.state.mi.us)

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IRVING B. ACKERMAN  
ALAN T. ACKERMAN  
STEPHEN B. BAGNE  
DARIUS W. DYNKOWSKI

Of Counsel  
Gregory A. Buss

42857 Garfield, Ste. 215  
Clinton Township, MI 48038  
(810) 228-0066  
Fax (810) 228-0078

March 21, 2001

VIA TELEFAX (517) 373-9255

Jose A. Lopez, Public Hearings Officer  
Bureau of Transportation Planning  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, MI 48909

Re: **City Management/Waste Management Property**

Dear Mr. Lopez:

The undersigned is in possession of the I-94 Rehabilitation Project Environmental Impact Statement Volume I. At match line sheet - 13, sheet 4, the build alternative illustrates a large area presently owned by CMC and fully utilized by CMC in a potential future acquisition.

The taking of the property along I-94 presently owned by CMC, as well as the portions of the property in the boundaries noted as Medbury and Henry, would seriously affect the overall operation. We urge you to review whether you truly desire to move forward with this type of cost, which will be in the millions, if not the tens of millions of dollars.

It may be that consideration has not been given to the property abandoned to and for the benefit of CMC. Is there recognition of the railroad ownership?

We would appreciate your thoughts. If you have any questions, do not hesitate to contact the undersigned.

Sincerely,



Alan T. Ackerman

CC: Ed Hoover

# COMMENTS

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We at Wayne State University have concerns about the possible impact on the accessibility (during and after construction) to our parking structures from the service drives along the Ford (I-94) and Lodge (I-10) Freeways and the further separation of various components of our campus by the possible widening of the freeways with the new and/or expanded service drives. Some of those concerns could be alleviated significantly by the construction of park bridges over both I-94 and I-10 Freeways to better connect the various components of our campus.

Our campus is dissected by the I-94 and the I-10 Freeways. Our central campus is in the southeast quadrant, our north campus in the northeast quadrant and our athletic campus in the southwest quadrant of the intersection of those two freeways. Our north campus is the future site of the planned Wayne State University Research and Technology Park in Detroit that is supported by the City of Detroit, the Michigan Economic Development Corporation (MEDC) and other private and public organizations.

Currently, the I-94 and I-10 Freeways serve as significant barriers for pedestrian traffic between the various sections of our campus. It is expected that those barriers will only increase with the I-94 Rehabilitation Project with the expected expansion of service drives along the freeways and around our campus and the closure of the Third Street bridge over I-94.

Because of the above concerns, we specifically request the following:

- a. Replacement of the pedestrian bridge over I-10 that connects our central campus with the athletic campus with a bridge that's more pedestrian friendly.

(OPTIONAL)

NAME \_\_\_\_\_  
(Please Print)

DATE \_\_\_\_\_

ADDRESS \_\_\_\_\_

CITY \_\_\_\_\_ STATE \_\_\_\_\_ ZIP \_\_\_\_\_

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Michigan Department of Transportation  
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- b. A pedestrian park across I-94 along Cass Avenue and/or Second Avenue similar to those along I-696 Freeway in Oak Park. This will serve to better connect our main campus to our north campus, which will be the home of the Research and Technology Park. We also expect that this area will include new housing and retail establishments that will connect Wayne State and the New Center area.
- c. A pedestrian park across the I-10 Freeway north of Warren Avenue. This would serve to reduce the barrier between our central campus and the athletic campus. Additionally, there are a number of housing units on both sides of the Lodge Freeway along Warren Avenue. A park bridge would serve to connect those housing units to the Wayne State campus on the eastside and the shopping areas on the westside of the freeway.
- d. The borders between the service drives and the freeways, and the bridges over the freeways around the campus should be shielded with brick and concrete walls (rather than chain links or similar fences) five to six feet high. This would shield the campus from the tremendous noise of the freeways similar to the park bridges in Oak Park along the I-696 Freeway.
- e. Notification during the conceptual design phase of any project that would replace, rebuild or remove the existing bridges over I-94 or I-10 along the Wayne State campus prior to the start of the I-94 Freeway Rehabilitation Project. If that were to occur, we would like to present the issues discussed in a, b and c above for such earlier projects.

The park bridges would go a long way toward making for a safer and much more pleasing situation for pedestrians moving between the various sections of our campus and

(OPTIONAL)

NAME \_\_\_\_\_  
(Please Print)

DATE \_\_\_\_\_

ADDRESS \_\_\_\_\_

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# COMMENTS

PAGE 3 of 3

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the surrounding community. They would also add a parkland type environment to an area that is very short of green space.

The above concerns are long-term issues. The best time for them to be addressed would be during the rehabilitation of the I-94 Freeway or during the replacement or reconstruction of any bridges that might occur earlier. Additionally, we are very concerned about the likely negative impact that the construction will have on our students and employees that work, study and live on our campus as well as our many visitors.

---

*John L. Davis* (OPTIONAL)

NAME John L. Davis, Sr. Vice President for Finance & Administration DATE 3/9/01  
(Please Print)

ADDRESS Wayne State University  
5700 Cass, Suite 4900

CITY Detroit STATE Michigan ZIP 48202

Please deposit your comments in the box at meeting site or mail, fax, e-mail comments to:

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Bureau of Transportation Planning  
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# WAYNE STATE UNIVERSITY

Finance and Administration

Senior Vice President for Finance  
and Administration and Treasurer Office  
6700 Cass, Suite 4900  
Detroit, Michigan 48202  
(313) 577-5580  
(313) 577-2338 Fax

March 8, 2001

Mr. Adiele Nwankwo, Ph.D.  
Vice President and Director of Transportation  
Parsons Brinckerhoff Michigan, Inc.  
535 Griswold Street  
Detroit, Michigan 48226

## Re: I-94 Freeway Rehabilitation Project

Dear Dr. Nwankwo:

Over the past two years, you and other representatives of the Michigan Department of Transportation have met at least twice with us at Wayne State to provide briefings on the planning for the I-94 Freeway Rehabilitation Project. We want to thank you for those opportunities.

During those meetings, we expressed some concerns with the proposed project. Those concerns included the possible impact on the accessibility (during and after construction) to our parking structures from the service drives along the Ford (I-94) and Lodge (I-10) Freeways and the further separation of various components of our campus by the possible widening of the freeways with the new and/or expanded service drives. Also, during our meetings, we indicated that some of those concerns could be alleviated significantly by the construction of park bridges over both I-94 and I-10 Freeways to better connect the various components of our campus.

As you are aware, our campus is dissected by the I-94 and the I-10 Freeways. Our central campus is in the southeast quadrant, our north campus in the northeast quadrant and our athletic campus in the southwest quadrant of the intersection of those two freeways. Our north campus is the future site of the planned Wayne State University Research and Technology Park in Detroit that is supported by the City of Detroit, the Michigan Economic Development Corporation (MEDC) and other private and public organizations.

Currently, the I-94 and I-10 Freeways serve as significant barriers for pedestrian traffic between the various sections of our campus. It is expected that those barriers will only increase with the I-94 Rehabilitation Project with the expected expansion of service drives along the freeways and around our campus and the closure of the Third Street bridge over I-94.

Because of the above concerns, we specifically request the following:

- a. Replacement of the pedestrian bridge over I-10 that connects our central campus with the athletic campus with a bridge that's more pedestrian friendly.
- b. A pedestrian park across I-94 along Cass Avenue and/or Second Avenue similar to those along I-696 Freeway in Oak Park. This will serve to better connect our main campus to our north campus, which will be the home of the Research and Technology Park. We also expect that this area will include new housing and retail establishments that will connect Wayne State and the New Center area.
- c. A pedestrian park across the I-10 Freeway north of Warren Avenue. This would serve to reduce the barrier between our central campus and the athletic campus. Additionally, there are a number of housing units on both sides of the Lodge Freeway along Warren Avenue. A park bridge would serve to connect those housing units to the Wayne State campus on the eastside and the shopping areas on the westside of the freeway.
- d. The borders between the service drives and the freeways, and the bridges over the freeways around the campus should be shielded with brick and concrete walls (rather than chain links or similar fences) five to six feet high. This would shield the campus from the tremendous noise of the freeways similar to the park bridges in Oak Park along the I-696 Freeway.
- e. Notification during the conceptual design phase of any project that would replace, rebuild or remove the existing bridges over I-94 or I-10 along the Wayne State campus prior to the start of the I-94 Freeway Rehabilitation Project. If that were to occur, we would like to present the issues discussed in a, b and c above for such earlier projects.

The park bridges would go a long way toward making for a safer and much more pleasing situation for pedestrians moving between the various sections of our campus and the surrounding community. They would also add a parkland type environment to an area that is very short of green space.

The above concerns are long-term issues. The best time for them to be addressed would be during the rehabilitation of the I-94 Freeway or during the replacement or reconstruction of any bridges that might occur earlier. Additionally, we are very concerned about the likely negative impact that the construction will have on our students and employees that work, study and live on our campus as well as our many visitors. After farther review of the draft environmental impact statement, it is possible that other concerns will be identified.

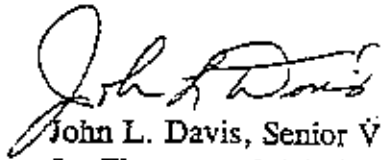


Mr. Adiele Nwankwo, Ph.D.  
Re: I-94 Freeway Rehabilitation Project  
March 8, 2001  
Page 3

We ask that another meeting be scheduled between your office and Wayne State to review the draft environmental impact statement and to discuss our requests and concerns mentioned above.

Thanks for your consideration and attention.

Sincerely,



John L. Davis, Senior Vice President  
for Finance and Administration

JLD/ff

c: Irvin D. Reid, President  
Faye Nelson, Vice President, Governmental and Community Affairs  
James Sears, Assistant Vice President, FP&M  
Jeffrey R. Saxby, Project Manager, Project Development, Design Division, MDOT

## COMMENTS

Public input is very valuable. Please let us know your concerns regarding the proposed re-design of I-94 from I-96 (Jeffries Freeway) to Conner Avenue in the City of Detroit, Michigan. Each comment will be shared with all the members of the study team for their consideration and will be included in the official transcript of the public hearing.

Comments should be postmarked or electronically dated on or before March 27, 2001.

I am a resident of the Woodbridge Historic District in downtown Detroit. My neighborhood will be intensely impacted by the ~~proposed~~ "build alternative" proposed by MDOT for I-94. Here are my comments.

- ① I am confused on how the new wider freeway and service drives (224 ft.?) will fit into roughly the same footprint as the existing freeway <sup>(as shown in the maps presented at the Public Hearing)</sup>.
- ② Could the width of freeway be reduced, if the "intermodal" lane was eliminated? I cannot see how public transit put in the middle of an 8 lane highway is practical. How would passengers get back to grade anyway? Shouldn't some conceptual work be done on this now?
- ③ The boundaries of the Woodbridge Historic District

NAME Alison Benjamin  
(Please Print)

DATE 3-26-2001

ADDRESS 5024 Avery

CITY Detroit

STATE MI

ZIP 48208

Please deposit your comments in the box at meeting site or mail, fax, e-mail comments to:

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e-mail: [lopezja@mdot.state.mi.us](mailto:lopezja@mdot.state.mi.us)

comments on I-94 expansion

Alison Benjamin - Resident

-2-

as defined by the MDOT staff are not correct. Regardless of the determination by MDOT that the ~~the~~ structures that are being taken are not "contributing", the residential character of the district is severely impacted by the expansion of the freeway and the continuous service drives. What is proposed to minimize the impacts of increased traffic, noise and air pollution?

I suggest that meetings be held to determine community residents' desires for:

- ① berms and sidewalks
- ② sound barriers
- ③ historically appropriate landscaping
- ④ new traffic calming measures / street patterns adjacent to the service drive.

Thank you very much. I look forward to hearing from you.

Alison Benjamin



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Fax: 313.872.2330 www.newcenter.com  
Telephone: 313.872.0188

26 March 2001

Jose A. Lopez, Public Hearings Officer  
Bureau of Transportation Planning  
Michigan Department of Transportation  
PO Box 30050  
Lansing, MI 48909

DELIVERED VIA FAX &amp; U.S. MAIL

Dear Mr. Lopez:

I am writing to voice the qualified support of New Center Council, Inc. for the "Build Alternative" outlined in the recently released I-94 Rehabilitation Environmental Impact Statement (EIS). Throughout the six years that New Center Council (NCC) has worked with MDOT and its consultants on the redesign of I-94, NCC has been gratified by the concern of the planning team toward the issues raised by New Center businesses and residents. MDOT has been very responsive to the goals of NCC, which have been consistent over the years.

- 1) Create direct, safe access and egress routes to and from New Center;
- 2) Create strong pedestrian and vehicular connections between New Center and the University Cultural Center;
- 3) Improve signage directing visitors to New Center, both on the freeway and after exiting the freeway;
- 4) Create more aesthetically pleasing gateways to New Center from the I-94 corridor; and
- 5) Minimize the taking of property for freeway expansion.

Despite our excellent working relationship with the planning team, however, NCC is concerned that much of what New Center seeks to accomplish through the I-94 Rehabilitation is not yet reflected in the plans, specifically with regard to Goals 2, 3 and 4.

The goal that is most clearly accomplished by the current plan is Goal 1 from above: NCC is very satisfied that the new roadway configuration, including interchanges, will greatly improve access to and from New Center. Regarding Goal 5 (minimizing impact), NCC encourages that every effort be made to preserve the United Sound Systems Recording Studios and the Fourth Street neighborhood; nevertheless, we believe that MDOT has done a good job overall of limiting the impact of the I-94 Rehabilitation on existing structures.

Goal 3 (improved signage) and Goal 4 (gateways), we understand, will be addressed in detail during subsequent design stages.

NCC Concerns

The biggest cause for concern, however, and the reason that NCC must qualify its support, is the proposed width of I-94 as it passes between New Center and the University Cultural Center. The wide right-of-way is at odds with Goal 2 above (pedestrian connections). We calculate that to build the new I-94 freeway as designed will require approximately 340 feet of right-of-way. This is roughly double the current right-of-way.

Mr. Jose A. Lopez, Public Hearings Officer, MDOT

26 March 2001

Page 2 of 4

New Center Council has been working during the last several years to redevelop the area bounded by I-94, Woodward Avenue, the CN/Conrail railroad and the Lodge Freeway as a walkable, pedestrian-friendly, mixed-use neighborhood, and to strengthen this district's connection to the University Cultural Center. The Farbman Group and NCC Development Corporation will begin construction this summer on 100 historic, loft-style apartments three blocks north of I-94. Wayne State University is leading an effort to develop a 500,000 square foot urban technology park in this same area. One of the guiding architectural principles for both projects is that new development should reinforce the vitality of streets for pedestrians. The end goal is to increase pedestrian traffic and economic activity between the University Cultural Center and New Center.

The I-94 Rehabilitation, as portrayed in the EIS, would create a substantial barrier between New Center and the University Cultural Center, greatly hindering our efforts to knit together these two districts.

NCC specifically questions the following elements of the design that increase its width with little if any apparent benefit:

- 1) *Service drive lanes ranging from 12 to 16 feet wide.* The EIS shows two 12-foot wide lanes and one 16-foot lane. Compare this to the I-75 service drive between I-94 and Holbrook, which is three 10-foot lanes, wide enough that it is used as an illegal drag racing strip. If thirty feet of pavement is used for drag racing, what effect can we expect forty feet of pavement to have on traffic speeds along the I-94 service drive? The forty feet of pavement allotted to each I-94 service drive is excessive. It will encourage speeding and make pedestrian crossings more difficult and dangerous. NCC believes that the width of the service drives should be reduced. Furthermore, we believe that service drives should be cantilevered over the freeway mainline to the greatest extent possible in order to narrow the effective distance across the freeway.
- 2) *Sidewalks along the service drives.* The EIS states that sidewalks along the service drives "would improve access for pedestrians". This gives rise to the question: Access to what? The most important pedestrian movement in the I-94 corridor as it passes through New Center is across the corridor, not along it. The sidewalks as shown would be virtually unusable because of their proximity to the service drives, where -- despite posted speed limits -- traffic will be passing by at up to 60 mph. Furthermore, if new development is attracted to the new service drives, it is not likely to be supportive of pedestrian activity. A good example is the commercial and light industrial development along I-96 in Livonia. If sidewalks are incorporated along the service drives, a raised planter filled with trees and other landscaping should separate them from traffic.
- 3) *Retaining wall terraces.* New Center Council is pleased to see that retaining walls have been shown in the Build Alternative cross-section rendering (Figure 2-7). We are concerned, however, with the concept of terracing that is portrayed in this rendering. Per agreement with MDOT, NCC has maintained the Lodge Freeway embankment as it traverses New Center, so NCC is familiar with the issues involved in maintaining this sort of environment. Our

Mr. Jose A. Lopez, Public Hearings Officer, MDOT

26 March 2001

Page 3 of 4

concern with the terraces is that plant materials other than weeds will find this environment inhospitable and that instead of landscaping these terraces will fill with litter. The precarious position of the terraces would make them extremely difficult to maintain. NCC suggests the installation of non-terraced red brick retaining walls. These will decrease right-of-way and provide an attractive visual image as freeway users pass through the heart of the city.

- 4) *Reserved space in the median for future lane expansion or transit.* It is New Center Council's understanding that rail or other transit systems located in freeway medians are not a preferred transit configuration among operators of transit systems. Land uses adjacent to freeways are typically auto- rather than pedestrian-oriented. This means that in order to access the median-based transit, riders would need to either a) walk long distances through uninviting auto-oriented environments or b) use other modes of transit, such as buses, to access the median. Both of these options decrease the attractiveness of median-based transit to riders and thus decrease its feasibility (your own study suggests that less than 2 percent of commuters would use I-94 transit service). This being the case, it appears that the most likely use for the 54-foot median, or four additional lanes, would be for auto or truck traffic. This means that the real number of traffic lanes proposed is, in fact, six in each direction. New Center Council believes that this is too much capacity for an urban freeway, at too great a cost to the adjacent communities. Experience tells us that additional capacity will quickly be eaten up by "capacity-initiated demand". In the case of I-94, this additional demand will come in the form of more cross-town commuters using I-94. Already more than half of all trips through this section of I-94 originate and end outside of Detroit. The creation of greater capacity will only serve to increase this number, meaning that greater benefits will accrue to those outside the city while places like New Center will pay the cost, in the form of decreased economic vitality, more air pollution and so on. Therefore, New Center Council asks that MDOT reconsider its plan to reserve space in the median for future lane expansion.

Even if all of the above recommendations to narrow the right-of-way were enacted, the new I-94 would still be much wider than it is now. Therefore, NCC is pleased to find that MDOT has recommended the introduction of at-grade pedestrian walkways in order to assure pedestrian access across I-94. NCC has recommended this sort of walkway since the inception of I-94 planning.

After seeing the examples in DEIS Figure 4-7, however, we are concerned about how the walkway idea will be implemented. A pedestrian bridge rendering by Snell Environmental Group provided by MDOT to NCC in 1997 shows a landscaped bridge approximately 40 feet wide connecting the termination of a street on one side of I-94 to a street on the other side of I-94. Figure 4-7, however, shows pedestrian zones sandwiched between vehicular U-turn roads.

What is most troubling is that the location of one of the pedestrian walkways bears no relationship to street patterns or any other discernable pedestrian pathway. Pedestrians, like automobiles, generally travel along streets, but in this drawing

Mr. Jose A. Lopez, Public Hearings Officer, MDOT

26 March 2001

Page 4 of 4

pedestrian walkways are not necessarily located at streets. Instead, their placement is dictated by the placement of vehicular U-turn structures

NCC believes that pedestrian walkways should occur at natural pedestrian crossing points, not where they are convenient from the standpoint of roadway design. NCC hopes to work with MDOT engineers and designers to locate walkways appropriately in New Center.

In closing, I would like to thank MDOT, Parsons Brinckerhoff Michigan, HNTB and the rest of the planning team for your attentiveness to the concerns of New Center and your recognition of the special circumstances here. New Center is a neighborhood with great history and an even greater future. New Center Council appreciates MDOT's desire to protect the economic, social, and physical vitality of New Center and your desire to play an important role as we take New Center to the next level. The I-94 Rehabilitation can be an important piece of a bright New Center future. We look forward to working with you to make it so.

Sincerely,



Kurt Weigle  
Vice President  
New Center Council, Inc

Copy: NCC Executive Committee  
Jeff Saxby, MDOT  
Andy Zeigler, MDOT  
Sue Mosey, UCCA  
Faye Nelson, WSU  
Danny Samson, Farbman Group

**Scott Thomas**  
**1423 Leforge APT616**  
**Ypsilanti, MI 48198**  
**(734) 482-5328**

**Jose Lopez**  
**Public Hearing Officer**  
**MDOT**

The proposed widening of I-94 may be necessary to reduce traffic congestion. However I think it is essential that MDOT work very closely with SEMCOG to attempt making it feasible to incorporate some much-needed mass transit alternatives into the project.

As a regular user of alternative transportation, I strongly support government efforts that encourage mass transit alternatives to single occupancy motor vehicles. With the stakes so high in this very expensive and labor intensive reconstruction project intended to reduce congestion on our metro area highways we must include mass transit as part of the answer.

With our metro area highway system failing due to over congestion and grid locked roadways, it should be a requirement that we give people the opportunity to chose between traffic backups and on time travel service.

In choosing the final project specifications, I seriously hope that some mass transit option can be made feasible in the road project. I really think, "If you build it they will come". That may well be all the incentive that people need to come out of gridlock and find just in time travel.

Sincerely,  
**Scott Thomas**



**Congress of the United States**  
**House of Representatives**  
Washington, DC 20515-2201

May 11, 2001

José A. López, Public Hearings Officer  
Bureau of Transportation Planning  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, MI 48909

Via Facsimile (517) 373-9255

Dear Mr. López:

This letter regards the Draft Environmental Impact Statement (DEIS) for the "I-94 Rehabilitation Project". A number of citizen groups and one governmental representative from the City of Ferndale have brought to my attention their concerns about this highway expansion project. (Please see the attached letter.) In addition, members of my staff have attended several meetings on or related to this topic. I understand this has been a controversial project and that MDOT has the difficult task of balancing transportation needs and responses with the concerns and needs of the community. However, I find many of the citizen concerns to be valid and I therefore urge you to give all of their points serious consideration.

While I recognize that the I-94 corridor needs rebuilding, I am particularly concerned about the magnitude of the recommended Build Alternative, corresponding air quality issues, environmental justice concerns, and Metro Detroit's need for improved and expanded mass transit options.

MDOT's "5 Year Road & Bridge Program, Vol. III - 2001 to 2005" states on page 81 that the I-94, I 96 to Conner Avenue research project is "the first phase of a larger project to rehabilitate two projects; I-94 between Wyoming Avenue in the city of Detroit and I-696 in Macomb County." Thus, it appears the DEIS for this immense segment does not address the entire scope of the I-94 rehabilitation plans, which would eventually extend into Harper Woods and beyond. Chapter 9 of the DEIS does not list Harper Woods or the City of Grosse Pointe Woods as recipients of DEIS materials.

The attached letter raises various air quality issues that may have serious consequences for community health and Detroit's air quality status under clean air laws. Environmental justice concerns such as the health, noise, and social impacts on local neighborhoods, the service drive sidewalks next to potentially speeding local traffic, and the unclear status of pedestrian overpasses also merit serious attention. (In a meeting with congressional staff, MDOT, and SEMCOG and representatives from Parsons Brinckerhoff, Inc., congressional staff was told that

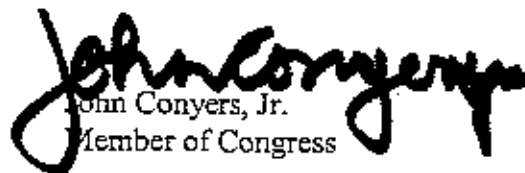
Letter to Mr. José López  
May 11, 2001

the pedestrian overpasses would be planned later on a case-by-case basis. Thus neighborhood and Wayne State University campus connectivity appear to be in jeopardy.)

Finally, committing such incredible resources to this particular road project before a regional transit plan has been developed concerns me especially given that one third of Detroit households do not have a car and most recent job creation has occurred in the suburbs. (The DEIS mentions the possibility of putting light rail in the median of I-94, but there are no current plans/studies that I am aware of that contemplate light rail in the I-94 corridor. Also, putting light rail in the middle of a highway corridor does not afford maximum opportunities for economic benefits to the local community.)

For all the reasons stated above, I respectfully request that MDOT seriously address the issues brought to my attention in the attached letter and any additional issues raised here. I commend you for your hard work and patience. I look forward to working with you in maintaining and improving Michigan's transportation infrastructure.

Sincerely,

  
John Conyers, Jr.  
Member of Congress

cc: James J. Steele  
Division Administrator, Federal Highway Administration



**Transportation Riders United [TRU]**

*A coalition to advocate for transportation access and mobility in southeastern Michigan*

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**Comments on the Draft Environmental Impact Statement for the I-94 Rehabilitation Project, FHWA- MI-EIS-01-01-D**

May 11, 2001

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Federal Highway Administration  
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Dear Sirs:

We, the undersigned 17 organizations, are filing joint comments that document our concerns with the Draft Environmental Impact Statement [DEIS] for the "I-94 Rehabilitation Project."

We oppose the "Build Alternative" (hereafter called the expansion alternative) as described by the DEIS. The "expansion alternative" consists of room for 24 traffic lanes and will have a staggering pricetag of \$1.3 billion for the 6.7-mile segment. This is about \$20 million per block. This alternative will increase our dependency on autos and trucks. It provides for a dangerous lack of diversity in our transportation investment. The "expansion alternative" is not in the best interest of the public trust.

This project defines a crossroad regarding the future of Southeast Michigan's transportation system. Do we continue to pour billions of dollars into new and wider highways, or do we steer Southeast Michigan in a better direction?

We, the undersigned organizations know that the better direction for this project is to diversify our transportation investments by investing in congestion-fighting transit options in our urban areas. Transit will add vitality to the City. The "expansion alternative" will suck vitality away from the project area.

We propose that the following reasonable alternative be made the preferred alternative for this project:

- Rehabilitate I-94 to its original design. This addresses the immediate need to fix the deteriorating condition of pavement and bridges. It is a more honest "rehabilitation." It doesn't render obsolete all of the construction with the associated traffic-delay cost that have plagued this vital I-94 corridor for years.
- Reduce posted speeds along this 6.7-mile section to maximize the capacity, reduce noise, reduce pollution, reduce crashes and improve energy efficiency.

- Further add transportation capacity along the corridor by investing in a modern commuter rail system with lines to serve Ann Arbor, Detroit and Mount Clemens. An additional line to Pontiac would offer an alternate to I-75 commuters who use I-94 to access areas of Central Detroit. Per SEMCOG data, a modern 3-line commuter rail system would cost about \$200 million, equivalent to the cost budgeted for traffic control during construction of the "expansion alternative."
- Further add transportation capacity along the corridor by investing in SpeedLink Bus Rapid Transit along Gratiot to Eastland, Grand River to City Limits and Michigan to Dearborn. These three lines, consisting of about 32 miles, would cost about \$385 million to establish based on SEMCOG's Transit Vision Forum during January 2001.

This alternative would meet the purpose and need of the proposed project, cost significantly less than the "expansion alternative" and meet the goals of the project as outlined below:

- Provide needed mobility along the corridor for *all* people and freight
- Enhance the potential for economic development within the City of Detroit and the study area.
- Result in beneficial social, environmental, and economic improvements to the host neighborhoods and the City of Detroit.
- Significantly reduce taxpayer investment while strengthening our transportation infrastructure through diversification.

#### **Additional comments on the DEIS**

This "expansion alternative" will have staggering adverse impacts to the human and natural environment on both the local community and the region. In addition, this alternative will be the most expensive road building projects in the state's history.

MDOT's "expansion alternative" is really 3 projects in one; the expansion of the main line, creation of the central median space, and creation of continuous service drives. MDOT intends to build these three projects three times in the I-94 corridor, Wyoming to I-96, I-96 to Conner (the current DEIS) and Conner to I-696. The project proposed in the current DEIS cannot be a successful stand-alone project and the other two segments need to be included to determine the cumulative impacts for the project. The DEIS has not addressed the cumulative impacts for the full project.

We challenge the scoping process that led to the study of only one segment of a larger much more damaging project (a proposed expansion of I-94 between Wyoming Ave in Detroit and I-696 in Macomb County.) Either the plan is to expand I-94 both east and west of this initial segment and it is segmentation, or it is not. The community needs to know what they are getting into if they say yes to this project.

In addition, nothing is provided in the DEIS to justify the expansive service drives proposed, the real need for the additional capacity of I-94, and the need for the space in the middle.

Where the DEIS goes beyond assertions and provides data such as on the projected level of service information provided, the "expansion alternative" is clearly excessive design even without the extra space in the middle for future expansion.

The proposed I-94 expansion project raises many crucial issues about appropriate scale and capacity of urban freeways, funding priorities for public transportation as well as roads within this corridor, congestion management during construction, usurpation of irreplaceable urban rail corridors, maintenance of air quality standards, mobile contributions to urban air toxics and environmental justice concerns, just to name a few. The DEIS does not provide acceptable or adequate answers.

We find the analysis and discussion of the purpose and need, project justification, air quality and noise impacts, environmental justice concerns, cumulative impacts of and alternatives to the proposed expansion to be woefully inadequate. Taken as a whole, the DEIS understates the adverse environmental impacts, ignores reasonable alternatives, and overstates both the need for and the economic benefits of this project.

Some specific technical issues that need addressed include:

1. **Air Quality violations are concealed:** Without any explanation, MDOT has used air quality data from a suburban air monitor to under-predict the air pollution impacts from this massive expansion. If MDOT had used Detroit-based data it would be obvious that the "expansion alternative" will violate health-based national air quality standards for carbon monoxide (CO). In addition, since the DEIS indicates that truck traffic will increase faster than automobile traffic, using default model inputs on vehicle mix is inappropriate.
2. **The DEIS does not address the new standards for fine particulate matter (PM 2.5) and Ozone.** The DEIS does not address the fact that under the Air Quality Standards recently upheld by the US Supreme Court, the air in the corridor is unhealthy (does not meet attainment requirements) for both PM 2.5 and Ozone, major air pollutants from car and truck emissions. Building the "expansion alternative" violates clean air laws because it is designed to increase air pollution emissions from cars and trucks in an area where the air is already unhealthy.
3. **Air Toxics are not addressed:** The Draft Environmental Impact Statement is totally silent about the increase in toxic pollutants during construction and from the increased truck traffic. Likewise, there is no discussion of the impact of mobile source toxics on human health or on the Great Lakes ecosystem due to air deposition.
4. **No provision has been made to install aftermarket emission controls on diesel construction equipment.** Regardless of the ultimate scale of the I-94 rebuild, aftermarket emission controls (including particle traps) on all construction equipment must be required.
5. **The DEIS ignores the link between increased highway traffic and health.** Detroit's children suffer from asthma at three times the national average. The Journal of the American Medical Association reports that traffic controls imposed during the Atlanta Olympics decreased morning peak traffic counts by 23%. During this period, Medicaid-related emergency room visits and hospitalizations

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for asthma dropped by 42%. The DEIS for I-94 ignores transit and rail alternatives that could reduce traffic and the pollution it causes.

6. **The "expansion alternative" will result in more crashes and higher injury rates than maintaining the current design of I-94.** A detailed review of the crash statistics in the DEIS shows that the crash rate along I-94 in the project area is 305 per 100,000 vehicles traveled (mvm). This rate is lower than the regional average of 350 crashes. Higher crash rates within the study area occur, not along I-94 but along I-75 and the Lodge where the lanes have been expanded. Thus it is very likely that the expansion will lead to a worse crash rate. The current design of I-94 is safer than the "expansion alternative."
7. **The international trade route rationale does not withstand close scrutiny.** MDOT has asserted that importance of I-94 overall to commerce and international trade. Nevertheless, this particular segment of I-94 is not key to the potential connections between Canada and Chicago, Fort Wayne, or Toledo. For traffic using the Blue Water Bridge between Port Huron and Sarnia, I-69 is the primary link between Canada and the west and south. This segment of I-69 is underutilized and for the most part does not pass through urban areas in Michigan. Traffic using the Ambassador Bridge to and from Canada will primarily travel I-94 west of I-96 and never use the segment discussed in the DEIS. The 6.7 segment east of I-96 is not critical to this network.
8. **MDOT's response to environmental justice concerns is an insult.** MDOT is touting sidewalks immediately along the curb of the service drives where no one wants to walk because of the fast traffic, pollution and noise. At the same time, it appears that the pedestrian overpasses that link communities across the expressway will be removed and not replaced, thus pedestrian access will actually be worsened.
9. **Space saved in the median for 'possible future transit' is unlikely to be effective in the future.** Light rail doesn't belong among 10 lanes of interstate traffic. Space "maybe for transit" is a ruse to create more space for truck lanes.

I-94 desperately needs to be rebuilt, but the "Expansion Alternative" cannot be justified economically, environmentally, or socially. In addressing the capacity needs of this corridor, there is the opportunity to increase the vitality of the City, not to continue to drain it.

We recommend abandonment of the "Expansion Alternative" and preparation of a supplemental DEIS that better addresses the concerns enumerated herein. Consistent with state-of-the-art transportation systems in all vibrant cities, rely on transit to increase capacity in the corridor. Use SEMCOG's transit vision, and an intermodal traffic analysis model. This project is too important to ignore the reasonable alternative as outlined at the beginning of this letter.

Sincerely,

Karen D. Kendrick-Handa  
President  
Transportation Riders United  
On behalf of:

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*On behalf of*  
Michigan Land Use Institute  
Arlin Wasserman

City of Ferndale  
Tom Barwin, City Manager

Sierra Club, Mackinac Chapter  
Bob Duda, Southeast Michigan Group  
Chairman

East Michigan Environmental Action  
Council  
Ms. Libby Harris, Director

League of Women Voters of  
Dearborn/Dearborn Heights  
Elizabeth Linick, President

Southwest Detroit Environmental Vision  
Billie Hickey, Interim Director

Michigan Environmental Council  
Lana Pollack, President

Hamtramck Environmental Action Team,  
(HEAT)  
Rob Cedar

Dr. Eugene Perrin  
Individual

Bill Houghton  
Individual

Michigan Association of Rail Passengers  
John D. DeLora, Executive Director

League of Women Voters,  
Detroit Metropolitan Area  
Carolyn Buell, President

Lung Association of Michigan  
Elliot Levinsohn, Manager, Air Quality and  
Environmental Health

Friends of Detroit River  
Jane Mackey, Chair

Environmental Law and Policy Center  
Ann Spillane, Sr. Attorney

Riverfront East Alliance  
Bob Jackman, President

Ecology Center of Ann Arbor  
Jeff Gearhart, Campaign Director

Public Interest Research Group of  
Michigan  
Brian Imus, Campaign Director

Citizens for Buses  
Harold Leese

Vic Randall  
Individual

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DATE: May 11, 2001

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I-94 DEIS Comments

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## MICHIGAN ENVIRONMENTAL JUSTICE COALITION

8469 E. Jefferson  
Detroit, MI 48214

May 11, 2001

Jose A. Lopez, Public Hearings Officer  
Bureau of Transportation Planning  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, MI 48909

VIA FACSIMILE  
(517) 373-9255

Re: Comments on the Draft Environmental Impact Statement for the I-94  
Rehabilitation Project

Dear Mr. Lopez:

The Michigan Environmental Justice Coalition (MEJC), Detroiters Working for Environmental Justice (DWEJ), the National Lawyers Guild/Maurice and Jane Sugar Law Center for Economic and Social Justice (the Guild Law Center or the GLC) and Groundwork for a Just World jointly submit the following comments on the Draft Environmental Impact Statement (DEIS) prepared by the Michigan Department of Transportation (M-DOT) for the proposed I-94 expansion. All four organizations work extensively in the areas of environmental justice and urban environmental issues.

MEJC was founded in 1997. This coalition of environmental, public health and community groups in Michigan was formed out of concern about the environmental health of low-income communities and communities of color and the disproportionate environmental burdens carried by these communities. MEJC works to raise awareness of environmental justice issues within Michigan and to assist environmental justice communities protect themselves from environmental harms.

Established in 1994, DWEJ was formed to address the disproportional burdens faced by people of color and low income residents in environmentally distressed communities. DWEJ is a coalition of community leaders, academia, environmentalists, non-profit housing developers, neighborhood activists, urban planners and environmental professionals throughout the City of Detroit and Southeast Michigan working together towards a cleaner, healthier and more prosperous community. Its goal is to create an empowered community that has the capacity to address environmental concerns and to participate in decision-making activities where they are able to offer solutions to the problems that they face. DWEJ is mandated to organize throughout Southeast Michigan

segmentation of proposed projects in conducting an environmental assessment. Rather, in urban highway projects, the key questions are whether the proposed project has independent utility or significance and whether it restricts alternatives for other reasonably foreseeable projects. *Clairton Sportsmen's Club v. Penn. Turnpike Comm'n*, 882 Fed. Supp. 455, 471 (W.D. Pa. 1995). In this case, M-DOT has not presented any information regarding the independent utility of expanding this particular 6.7 mile stretch of I-94 nor explained how the proposed expansion will avoid limiting alternatives for the planned improvements to the remaining sections of I-94. We believe that the DEIS must

NEPA does not contain substantive requirements on the amount of environmental harm that may be caused by major federal actions. Instead, NEPA relies on exposing environmental concerns and forcing consideration of reasonable, potentially less damaging alternatives to ensure that federal agencies and their state counterparts avoid the unreasonable environmental and social consequences of major federal actions. Full consideration of the range of reasonable alternatives is crucial to this process. We believe that M-DOT has failed to meet this obligation in its DEIS.

A. M-DOT Failed to Consider Reasonable Alternatives to the Preferred Build Alternative.

Although M-DOT initially proposed a number of alternatives to its preferred Build Alternative, many were not reasonable or complete, in light of the stated goals of the project, and M-DOT has failed to consider others that could have accomplished the project goals at lower cost to surrounding communities and the environment. By giving full consideration only to those alternatives that could not possibly fulfill the project's stated goals, M-DOT has improperly stacked the deck in favor of its proposed Build Alternative.

In conducting an Environmental Impact Statement (EIS), the lead agency is required to consider other reasonable courses of action and to compare the environmental and social consequences of the preferred alternative to the effects of these reasonable alternatives. 42 U.S.C. § 4332(2)(C)(iii); 40 C.F.R. § 1508.25(b). The "reasonableness" of a proposed alternative is determined by how well it meets the project's goals. *Clairton Sportsmen's Clubs*, 882 Fed. Supp. at 477. An agency may not manipulate the pool of alternatives, and the outcome of the EIS analysis, by defining the project's goals so narrowly that reasonable alternatives are eliminated. *Simmons v. U.S. Army Corps of Engineers*, 120 F.3d 664, 666, 668-69 (7th Cir. 1997). Similarly, M-DOT should not be allowed to manipulate the results of the EIS review by only considering alternatives that are easily excluded based on the stated goals of the project.

M-DOT identified several goals for the project: increased mobility through reduction of congestion; improving safety and traffic operations; and replacing interchanges. With the exception of the preferred Build Alternative, the options considered represent, at best, partial steps toward meeting these goals. For example, M-DOT proposed alternatives that would increase capacity without replacing the interchanges that the agency had determined were inadequate or outdated, see Draft Environmental Impact Statement (DEIS), Section 4.2.4, or would draw truck traffic off I-94, but would not improve existing road conditions or interchanges. see DEIS. Section.

- (1) Reduced expansion of I-94 with improvements to interchanges: M-DOT should consider an alternative that includes improvements to existing conditions on I-94 and improvements to the inadequate interchanges, along with a more limited expansion proposal. For example, M-DOT could consider options that eliminate the 54.5 feet of reserved space in the center of the highway, construct the continuous service drive in lieu of adding a lane to the mainline highway, narrow the shoulders, limit the service drive to two lanes instead of three, designate the additional lane on the mainline highway for HOV traffic or mass transit or any combination of the above.
- (2) Improvement of safety features, road conditions and interchanges with improvements to mass transit: M-DOT should consider an alternative that includes necessary upgrades to road conditions and safety features (such as eliminating left-lane exits and increasing the width of the shoulders) along with improvements to mass transit to reduce congestion. This alternative could be designed in collaboration with the Southeast Michigan Council of Governments, which is currently developing a regional transit plan to reduce congestion on area roadways.
- (3) Construction of a service drive, necessary road improvements and improvements to mass transit: M-DOT should consider construction of a continuous service drive, improvements of road conditions and interchanges in conjunction with an increased reliance on mass transit to overcome both the congestion and the safety issues described in the DEIS. By pulling local traffic off the highway and increasing the availability of mass transit, M-DOT may significantly reduce congestion on the highway without expanding the number of driving lanes.

By limiting its consideration to clearly inadequate alternatives, M-DOT essentially guaranteed that the only reasonable alternative was its preferred Build Alternative. We believe that such transparent manipulation of alternatives should not be allowed. Instead, to fulfill its obligations under NEPA, M-DOT must justify the sheer volume of its preferred Build Alternative, which requires serious evaluation of other reasonable alternatives. Without information on the expected benefits and environmental consequences of more limited expansion options, such as those outlined above, neither M-DOT nor the public can make an informed decision as to the necessity of the massive expansion proposed in M-DOT's preferred Build Alternative. See *City of Carmel-By-The-Sea v. U.S. Dep't of Transportation*, 123 F.3d 1142, 1150-51 (9th Cir. 1997) (EIS must be adequately complete to foster informed decision-making and informed public participation). Moreover, unless M-DOT gives meaningful consideration to truly reasonable alternatives, we believe that it will have failed to give its proposed alternative the "hard look" required by NEPA. See *Hughes River Watershed Conservancy v. Glickman*, 81 F.3d 437, 443 (4th Cir. 1996). Therefore, M-DOT should revise the DEIS to ensure that the final document includes full consideration of at least some of the truly reasonable alternatives described above.

B. M-DOT's Analysis of the Benefits and Disadvantages of the Alternatives Considered is Unrealistic and Incomplete.

M-DOT has failed to conduct a realistic and complete assessment of the advantages and disadvantages of its proposed alternatives. By failing to consider some costs of its preferred alternative and improperly discounting the benefits of rejected alternatives, M-DOT has again stacked the deck in favor of its preferred Build Alternative and failed to give its plans the "hard look" required by NEPA.

For example, M-DOT acknowledges that the preferred Build Alternative will draw a significant volume of traffic onto the continuous service drives. This is, in fact, one of the reasons for including a continuous service drive. However, M-DOT does not credibly assess the impacts of this additional traffic moving at-grade through the surrounding community, focusing only on the potential positive effects, such as additional customers for area businesses, rather than the obvious negative ones. Although M-DOT states that this additional traffic may create noise problems or draw more traffic onto local streets, it fails to provide any quantified or detailed information about these acknowledged harms. Without a more complete analysis of these negative impacts, M-DOT's analysis fails to meet NEPA's "hard look" standard. See *Neighbors of Cuddy Mountain v. U.S. Forest Service*, 137 F.3d 1372, 1379 (9th Cir. 1998); *Hughes River Watershed Conservancy*, 81 F.3d at 444-45.

In addition, M-DOT has blatantly exaggerated the benefits that would accrue to the local community from its preferred Build Alternative. For example, M-DOT relies almost exclusively on the economic development that its preferred Build Alternative may bring to the affected area to counterbalance the recognized social and environmental disruptions to those communities. To make its assessment credible, however, M-DOT must balance its speculations regarding the increased business that a continuous service drive would bring to small businesses along the proposed I-94 expansion with an explicit consideration of the probable number of businesses that will be fatally disrupted by the construction itself. Because the construction project is likely to be lengthy and many businesses may have limited or no direct access from area roads, some may not be able to survive the resulting decline in sales to benefit from the increased access anticipated in the DEIS. If M-DOT includes the potential long-term benefits to area businesses in its DEIS, it must also consider the potential short-term destruction of area businesses during the disruption related to major construction.

The most insulting and egregious example of this exaggeration of benefits is M-DOT's assertion that construction of sidewalks along the continuous service drive would increase recreational jogging and walking opportunities. If M-DOT insists on including expanded recreational opportunities as a project benefit, it should also calculate the probable health costs of engaging in vigorous exercise in areas with elevated carbon monoxide, particulates and other air pollutants associated with motor vehicle operation.

M-DOT has also implicitly asserted that the reserved space in the center of the expanded project will be used for transit in the future and that this use will benefit the

surrounding community. However, M-DOT has provided no details about this possibility, preventing any meaningful evaluation of the costs and benefits of such transit lanes. If M-DOT plans to rely on the benefits of this nebulous proposal in evaluating the environmental impacts of its preferred Build Alternative, it must revise the DEIS to include more specific details, including who would be served by this rapid transit system, whether the surrounding community would be able to use it, how these lanes would be accessed from the community and more.

In addition to relying on nebulous benefits and minimized harms, M-DOT has failed to provide sufficient information to evaluate its analysis of some options. For example, in evaluating options that would rely on reducing traffic volume to reduce congestion, M-DOT simply asserts that neither mass transit nor high-occupancy vehicles could be expected to draw sufficient ridership to affect congestion on I-94. However, M-DOT either provides no support for these assertions or references studies that are not readily available to the public for review and comment. Without understanding the basis for these assumptions, public commenters cannot possibly assess the validity of M-DOT's assertions.

For example, M-DOT's evaluation of willingness to use mass transit may be based on current conditions rather than projected travel volumes for the near future. Certainly, many more people may be induced to carpool or use mass transit if congestion increases significantly. Stated willingness to use such alternative means of transportation may also increase as more commuters become familiar with these services and the number of commuters willing to use light rail systems may be significantly higher than those willing to commute by bus. The presentation of these options in the DEIS provides inadequate information for a full assessment. See *City of Carmel-By-The-Sea*, 123 F.3d at 1150-51 (noting that an EIS must be sufficiently detailed to allow for informed public participation). Moreover, M-DOT's curt analysis of this option appears to be in conflict with a recent survey conducted by the Southeast Michigan Council of Governments, which found that 42% of southeast Michigan residents would be very likely to use a properly aligned mass transit system. (The full results of this survey are available on the SEMCOG website, located at <http://www.semcog.org/news/releases/surveyresults.html>.)

M-DOT should expand discussion of these sections to include some reference to the assumptions underlying the studies upon which it relies and, if it has not already done so, should attach those studies as appendices to the DEIS.

### III. M-DOT'S TITLE VI/ENVIRONMENTAL JUSTICE ANALYSIS IS FUNDAMENTALLY FLAWED.

M-DOT's preferred Build Alternative will create substantial harm to the predominantly low-income, minority community surrounding the proposed expansion and will bring few benefits to this community. While the majority of the residents in the project area do not own a car, rely on public transportation and, therefore, will not benefit from the expanded access to I-94, these people have to bear the burden of this project.

This is a classic case of environmental injustice and M-DOT must revise the DEIS to ensure that the issue is not simply ignored or swept under the rug

A. M-DOT Has Not Demonstrated the Lack of Viable, Less Damaging Alternatives As Required to Justify The Environmental Injustices Caused By This Project.

M-DOT acknowledges that this project will have a disproportionate impact on communities of color and that, under Department of Transportation guidelines, it should only be carried out if there is a substantial need for the project, based on overall public interest, and any alternatives that would have less adverse effects on the protected population would have more severe social, economic or human health impacts or would be extraordinarily expensive. DEIS, § 5.14. Even assuming that M-DOT's limited explanation of the need for this project is sufficient to meet the first part of this standard, M-DOT is only able to show that its preferred Build Alternative meets this standard by limiting its analysis to straw man alternatives.

Rather than seriously considering other reasonable alternatives, M-DOT limited its analysis to the No-Build and Enhanced No-Build Alternatives and a completely ludicrous proposal to entirely realign I-94. Moreover, in its analysis, M-DOT considered only alternatives that would avoid the disproportionately high impacts and made no effort to consider alternatives that might reduce that impact, as required. This analysis is wholly inadequate and borders on bad faith. M-DOT must evaluate whether relying on a reduced expansion of I-94 and/or an increased reliance on mass transit could mitigate the harm to the surrounding community. The latter piece is especially significant for the minority population that would be harmed by M-DOT's preferred alternative. M-DOT recognizes that almost one-third of this population does not have access to a car and, therefore, would get no direct benefit from eased congestion on I-94. An alternative that relied on increased availability of mass transit would not only reduce the negative impacts of increased traffic volumes, but also provide a positive benefit in increased mobility for the affected communities.

M-DOT must revise its Title VI/environmental justice evaluation to consider reasonable and practicable alternatives that could, in fact, reduce harms to the affected community without creating more significant harm to other communities or raising project costs to an unreasonably high level. M-DOT's consideration of the totally specious alternative of entirely realigning I-94 should be removed from the DEIS.

B. M-DOT's Environmental Justice Analysis Fails to Consider the Cumulative Environmental Burden on the Affected Community.

M-DOT's cursory environmental justice analysis completely fails to address the total cumulative burden on the affected community or the unique health issues facing this community. M-DOT completely ignored air toxic emissions and localized particulate levels, both of which could have serious environmental justice implications. As mentioned below, in Section IV.D, M-DOT failed to give any serious thought to the

cumulative air impacts of the proposed highway expansion in conjunction with existing industrial uses. M-DOT also paid no attention to health problems in the affected community, such as higher than average rates of asthma and other respiratory diseases or the recognized health effects of traffic-related air pollution, such as increased cancers and more significant asthma problems. M-DOT ignores the fact that schools that abut the highway will be summarily denied noise mitigation under M-DOT's existing criteria and that the predominantly minority and low-income populations of these schools will certainly be burdened with increased traffic noise.

In short, even though M-DOT has ignored many of the significant effects of its preferred Build Alternative on the environmental justice communities surrounding the proposed expansion, it still cannot justify its decision to build under the DOT's own regulations. We believe that the preferred Build Alternative cannot be justified in light of DOT's environmental justice regulations and guidelines.

#### **IV. M-DOT DID NOT ADEQUATELY CONSIDER THE ENVIRONMENTAL AND SOCIAL IMPACTS OF ITS PREFERRED BUILD ALTERNATIVE.**

##### **A. M-DOT Has Failed to Adequately Address the Air Quality Effects of its Preferred Build Alternative.**

In its consideration of the air quality impacts of this project, M-DOT has relied on inappropriate air quality standards and air emissions data, has failed to consider a whole range of pollutants and has not addressed the unique health status of residents in the affected communities. MEJC, DWEJ, the GLC and Groundwork for a Just World believe that M-DOT must revise its analysis of air impacts accordingly.

M-DOT based its DEIS analysis of air quality impacts on the existing National Ambient Air Quality Standards (NAAQS), despite the fact that these standards will be replaced long before the proposed expansion is complete. Several years ago, the Environmental Protection Agency (EPA) determined that the current one-hour ozone standard did not accurately reflect actual exposure levels or adequately protect the public health. As a result, the EPA developed a new eight-hour ozone standard, which, after a lengthy legal challenge, should soon be implemented. Data collected by the Michigan Department of Environmental Quality (MDEQ) shows that the Southeast Michigan Metropolitan Statistical Area, which includes Wayne county, cannot meet the new ozone standard under current conditions, let alone after the massive highway expansion proposed by M-DOT. M-DOT also failed to consider a soon-to-be-implemented NAAQS for small particulate matter (PM-2.5). To evaluate the environmental impacts of the preferred Build Alternative accurately and to ensure that this project will be allowed to proceed, M-DOT must consider probable air emissions in light of these new air quality standards.

The air monitoring analyses are also flawed because of M-DOT's inexplicable decision to use air quality data from a suburban monitor. This data was used to estimate the background, or non-traffic related, air emissions in the project area and to calculate

total projected air emission levels for 2020. However, this suburban monitor does not capture the emissions from other industrial contributors to air pollution in the project area and, in fact, provide a background CO level approximately 0.5 ppm less than would be calculated using monitors closer to the project. As a result, M-DOT's air quality predictions underestimate total pollution levels in the project area. M-DOT must redo this analysis, using a background monitor closer to the project area.

The DEIS simply ignores air toxics. Motor vehicle traffic is responsible for generating a significant amount of air toxics. For example, motor vehicles are responsible for up to half of the smog-forming volatile organic compounds (VOCs) and nitrogen oxides found in urban air, along with more than 50% of the hazardous air pollutants, and 90% of carbon monoxide found. Changes in gasoline formation have made it even more likely that motor vehicle traffic will release VOC vapors into the air. Because these toxic air pollutants are clearly related to motor vehicle traffic, they should be considered in the DEIS.

Finally, we believe that M-DOT should more explicitly consider the health impacts of the proposed Build Alternative. The affected community is already overburdened with toxics emitted from the many industrial, manufacturing, and incinerators located nearby. Motor vehicles are an additional source of significant levels of pollution. Studies have shown that children who live near heavily traveled roads and highways are at greater risk of developing cancer, including leukemia. According to Colorado researchers, children living near transportation corridors carrying 20,000 or more vehicles per day are about six times more likely to contract cancer, including leukemia. The increased traffic is also likely to affect asthma rates and the seriousness of asthma attacks in the area. The Journal of American Medicine reports that, during the Atlanta Olympics, morning peak traffic decreased by 23% and, at the same time, Medicaid-related emergency room visits and hospitalizations decreased by 42%.

Increasing traffic in an area where there are high rates of asthma, cancer, and respiratory disorder/illness is an environmental injustice. MEJC, DWEJ, the GLC and Groundwork for a Just World believe that the health of the community and its children, in particular, cannot be sacrificed through this project. M-DOT must consider the likely health impacts of its preferred Build Alternative and the increased traffic it will bring in the final EIS.

B. M-DOT's Proposed Mitigation for the Noise Impacts of its Preferred Alternative is Inadequate.

M-DOT acknowledges that its preferred Build Alternative may increase noise levels in the adjacent communities. Although we believe that M-DOT's analysis fails to consider the likely increase in traffic and associated traffic noise as commuters are attracted to I-94 from other cross-town arteries, we are most concerned with M-DOT's assessment of mitigation measures.

First, M-DOT appears to provide no possibility for mitigation to protect



businesses, schools, day care centers, libraries or other public buildings affected by the proposed I-94 expansion. M-DOT's explanation of its mitigation policy refers only to mitigation for residences. In addition, when considering mitigation within the nine locations identified as potentially suffering remediable adverse impacts, M-DOT essentially treated two schools located on property fronting the highway as the equivalent of a single residence. We believe that this assessment is wholly unreasonable. In considering mitigation for noise impacts, we believe that M-DOT should guarantee that noise impacts will be mitigated in any areas in which schools will be negatively effected or, at minimum, should calculate the cost-benefit for installing noise barriers by developing a residence equivalent for schools.

For example, using the 2.6 persons per residence figure given by M-DOT in Section 5.1.2.1 of the DEIS, the \$30,000 per residence baseline for determining the feasibility and reasonableness of installing noise barriers translates to approximately \$11,500 per person. Because students spend approximately eight hours per day in school, while a typical working or school-age person would spend up to 16 hours per day at his or her home, this figure could be reduced proportionately to generate a \$5,750 per pupil baseline for determining whether constructing a noise barrier is reasonable and feasible. Under this analysis, a noise barrier would be reasonable and feasible for the study area west of I-75 between Euclid Street and Clay Street if the two schools located in that area had a combined enrollment of at least 95 students.

We believe that any reasonable assessment of the per-pupil value of noise barriers will result in a decision to mitigate, but we prefer that M-DOT simply guarantee that it will mitigate obtrusive noise levels in areas where schools front the expanded I-94. Given the widespread concern over educational achievement in Detroit-area schools, M-DOT should not allow itself to contribute to the problem by refusing to mitigate distracting noise levels in areas adjacent to schools.

Second, M-DOT should consider other mitigation measures to alleviate the noise problems generated by the proposed expansion. For example, M-DOT states that noise mitigation will be impossible for any section of I-94 where traffic volume on the continuous service drive exceeds 2000 cars per hour. We believe that M-DOT should consider mitigating noise impacts by reducing the size of the service drive to ensure that it does not have the capacity to carry 2000 cars per hour. This mitigation measure would have the added benefit of reducing the size of the expansion and, potentially, reducing the amount of property and the number of residences and businesses that will need to be acquired.

C. M-DOT Barely Touches on the Social Impacts of the Preferred Build Alternative.

MEJC, DWEJ, the GLC and Groundwork for a Just World believe that M-DOT must include a far more detailed analysis of the social impacts of this project. As mentioned earlier, M-DOT's social impact assessments tend to exaggerate the benefits of the proposed project, while downplaying or ignoring social harms. For example, as noted

above, the construction phase of the project is likely to reduce or wholly block the accessibility of some area businesses and will certainly cause some loss of business. Business owners will never be able to gain the profits during the construction period and some may not be able to withstand a lengthy construction period.

M-DOT has also failed to adequately consider the social impacts of the proposed service drives. Increased traffic on the service drive will certainly create some annoyances for the surrounding community and may make it more dangerous for children to cross the street. This increase in traffic moving through the community may cause increases in pedestrian and automobile accidents. In addition, the changes to the pedestrian bridge configuration may further disrupt neighborhoods, making it more difficult for community members to access friends and resources on the other side of the highway.

D. M-DOT'S Consideration of Cumulative and Secondary Effects is Inadequate and Violates its Obligations under NEPA.

1. M-DOT's evaluation of indirect or secondary impacts is incomplete.

Under NEPA, an EIS must include consideration of the secondary or indirect effects of its proposed alternatives. Indirect or secondary effects are defined as those reasonably foreseeable effects, which are caused by the action, but occur later in time or are farther removed. 40 C.F.R. § 1508.25(c). M-DOT's analysis of secondary effects is wholly inadequate.

Although M-DOT acknowledges that its preferred Build Alternative will change traffic patterns on existing surface streets, it makes no attempt to assess the impacts of these traffic changes. M-DOT does not even discuss whether traffic will be moved from residential streets to commercial corridors or vice versa. As noted earlier, a simple listing of environmental impacts without any effort to quantify the probable impacts or provide details about them fails to comply with NEPA's "hard look" standard. *Neighbors of Cuddy Mountain*, 137 F.3d at 1379. At minimum, M-DOT should expand its discussion of secondary or indirect effects to assess the impact of the changes in surface street traffic patterns that it has acknowledged.

In addition, M-DOT fails to consider other potential secondary impacts. Most notably, M-DOT nowhere explicitly recognizes that, if the dramatic expansion proposed for I-94 improves safety, traffic flow and speed as asserted by M-DOT, it is likely to draw additional traffic to this stretch of I-94 from other cross-town arteries or induce new drivers to use the highway. This would increase air pollution, noise and traffic volume on the continuous service drive, resulting in additional adverse impacts on the surrounding community.

Numerous studies support this notion. In 1999, the EPA found that several years after a road's space is expanded by 10%, traffic increases by 7% to 10%. In 1998, the

Surface Transportation Policy Project found that urban areas that widened major roads spent roughly \$22 million more on construction, yet their traffic congestion afterwards was nearly identical to that of areas that did not expand their road system. University of California/Berkeley researchers have documented similar patterns, finding that every 10% increase in road space generated a 9% rise in traffic over four years. In addition, at least one court has recognized the tendency for road improvement or expansion projects to draw additional traffic by attracting development, inducing people to make additional trips and drawing traffic from other, more congested roads. *Coalition on Sensible Transportation, Inc. v. Dole*, 826 F.2d 60, 67-68 (D.C. Cir. 1987). MEJC, DWEJ, the GLC and Groundwork for a Just World believe that failure to consider such effects constitutes serious error and may entirely invalidate the DEIS. *Id.* at 68.

Continued commitment to expanding highway capacity in the Detroit area, as demonstrated by the proposed expansion and the decision to reserve capacity for adding two more traffic lanes in each direction, is also likely to have a negative impact on development of mass transit alternatives. By making commuting in single-passenger vehicles easier, M-DOT is effectively reducing incentives to develop or use a mass transit system. Consideration of this secondary impact should include an evaluation of the negative impact such disincentives for mass transit will have on the third of Detroit residents without access to a car.

2. M-DOT's evaluation of cumulative impacts is incomplete.

As M-DOT recognizes in the DEIS, cumulative impacts are those effects that result from the incremental impacts of an action when added to other past, present and reasonably foreseeable future actions regardless of what agency (federal or non-federal) or person undertakes such other actions. 40 C.F.R. § 1508.25(c). Under this definition, M-DOT's assessment of the cumulative impacts of the proposed I-94 expansion should consider other existing or reasonably foreseeable activities that may result in similar, and therefore potentially cumulative, effects. M-DOT's decision to limit its cumulative impact analysis to other transportation projects is completely inadequate, because it ignores many other activities resulting in similar harms. See *City of Carmel-By-The-Sea*, 123 F.3d at 1161 (noting that an EIS for a road construction project that would encroach on wetlands must consider the effects of a nearby housing development that might encroach on the same area).

M-DOT's cumulative impact analysis considers only the positive impacts of a handful of additional transportation projects. Nowhere in this analysis does M-DOT consider the additional impacts of similar expansions to adjacent sections of highway, as discussion in Section I of these comments. Even if M-DOT was acting within the law in defining the project itself to exclude the highway expansion envisioned throughout the metro Detroit area, this planned expansion must be considered in the cumulative impact analysis. Similarly, M-DOT fails to consider other proposed highway expansions in the area, including work on I-75 and I-375 in downtown Detroit. M-DOT's analysis of the likely cumulative effects is entirely one-sided, considering only the potentially positive economic benefits of these projects and ignoring the potential for these project to draw

additional traffic, increase air emissions, increase noise and cause additional displacements of homes and businesses and disruptions of communities. M-DOT must revise its DEIS to include a detailed consideration of the negative cumulative impacts of these projects, as well as their potential to increase economic opportunities.

Given the large number of transportation projects being planned for this region, we believe that M-DOT should consider developing a Programmatic Environmental Impact Statement (PEIS). A PEIS should be prepared for "broad Federal actions." 40 C.F.R. § 1502.4. Such overarching assessments have been performed for other large-scale transportation plans and we believe that a PEIS may be the best way to develop a complete transportation plan that meets the needs of the community without undue impacts on the environment or on the largely minority and lower-income communities that live next to Detroit's highways.

By focusing its analysis only on a limited number of transportation projects, M-DOT is able to limit its analysis to potentially beneficial cumulative impacts. If M-DOT were to consider other activities that impact the air quality or noise levels in the surrounding community, its cumulative impact analysis would not be so rosy. For example, there are two medical waste incinerators and one municipal waste incinerator in the vicinity of the I-94 expansion, along with any number of factories and industrial operations. Like the vehicles that will use I-94, these facilities may also emit particulates, ozone, nitrogen oxides and carbon monoxide. These effects may be particularly significant for the community affected by this project, because of the high rates of asthma and other respiratory diseases in the area. The DEIS does not adequately capture these impacts, because M-DOT chose to use background air levels measured at a distant, suburban monitor that would be unlikely to capture the background pollution generated by the industrial operations and incinerators near the proposed expansion. M-DOT must include an explicit consideration of the cumulative air impacts of its preferred Build Alternative in combination with other polluting facilities and the existing health status of the affected community in its final EIS. These same facilities may also be contributing to the noise level in the community affected by the I-94 expansion and the final cumulative impact analysis should recognize this fact.

Because cumulative impacts include reasonably foreseeable actions, M-DOT should also consider the air and noise impacts of those reasonably foreseeable expansions in industrial operations that may be generated by an expansion in the carrying capacity of I-94. In addition, by reserving space for two additional lanes of traffic in each direction on I-94, M-DOT has recognized that further expansion of the driving lanes on I-94, along with the resulting increase in air pollutant emissions and noise, is a reasonably foreseeable action. If the effects of additional expansion are not fully evaluated as a secondary impact, M-DOT should include them in its analysis of cumulative impacts. As noted above, this analysis should also consider the probable consequences of the continuing emphasis on increasing highway capacity rather than improving mass transit options.

As in other sections of the DEIS, M-DOT has emphasized the positive aspects of

its preferred Build Alternative and ignored or given short shrift to the negative ones. For example, M-DOT suggests that noise levels will decrease because of the placement of noise barriers in the community. Yet, in earlier sections of the report, M-DOT admitted that it would not provide noise barriers for a significant number of areas impacted by the project and that the traffic drawn onto the continuous service drives might present an unremediable noise issue for the adjacent community. M-DOT must revise its cumulative impact analysis to make a more reasonable assessment of both the positive and negative impacts of the preferred Build Alternative.

#### **V. M-DOT HAS SHOWN A LACK OF CONCERN FOR THE PUBLIC IN ITS PUBLIC PARTICIPATION PROCESS.**

M-DOT's public comment procedures were not "user-friendly" and resulted in frustration for many would-be commenters. The DEIS was primarily distributed to engineers, planners, construction agencies, and the like. M-DOT should make it a priority to distribute the DEIS to community groups, grassroots organizations and neighborhood associations. The DEIS should also be readily available to any member of the public willing to comment. When a member of DWEJ's staff called to request a copy for another grassroots organization, she was told to get a copy at one of the listed sites, but was only able to find the appendices at the site she visited (the Detroit Public Library). Staff at that site reported that they had never received the body of the DEIS. Even at the public comment hearings, M-DOT only provided copies of the summary.

In addition, the public comment meetings were not user friendly. Public hearings can be intimidating to the general public. This is particularly true when they have to decipher technical documents, such as the maps and project descriptions for the proposed expansion, to make meaningful comments. M-DOT's decision to present information only in written form, without adequate staff present to explain the maps and project summaries, was unfair to people who cannot read or don't have the training or experience to understand the presentations on their own. MEJC, DWEJ, the GLC and Groundwork for a Just World believe that an open forum that included verbal presentations of the project and an opportunity for discussion would be more effective.

The public should also have been more involved in the initial evaluation of transportation needs in the area and initial project development. Public participation at the end of a long and complicated planning process is simply inadequate.

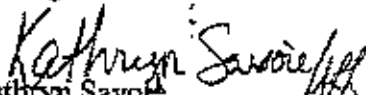
#### **CONCLUSION**

Significant changes must be made in the DEIS before it meets the basic legal requirements of NEPA. As currently drafted, the DEIS is may be improperly segmented, fails to consider reasonable alternatives, provides an incomplete assessment of project impacts, including its environmental justice impacts, and is improperly biased toward M-DOT's preferred Build Alternative. If the needed changes are made, we believe that M-DOT will have to recognize that the environmental and social costs of the preferred Build Alternative significantly outweigh its benefits.

We urge M-DOT to give serious consideration to other reasonable alternatives that limit or eliminate the expansion and focus more heavily on mass transit options to reduce congestion on I-94. Under TEA-21, Michigan has received a huge increase in transit funding, which could be used to support an alternative that focuses on providing the public transportation desperately needed by Detroit. Transportation agencies in this area, including M-DOT, are not listening to the needs of the communities that they are meant to represent. The solution to traffic congestion on I-94 does not have to come at the expense of the low-income communities and communities of color surrounding this highway.

Sincerely,

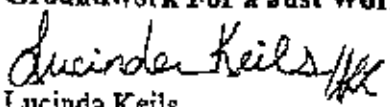
Michigan Environmental Justice Coalition

  
Kathryn Savore

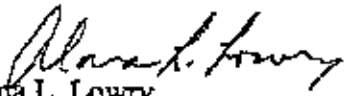
  
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# City of Detroit

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☐ URGENT ☐ REPLY ASAP ☐ PLEASE COMMENT ☐ PLEASE REVIEW ☐ FOR YOUR INFORMATION

TOTAL PAGES, INCLUDING COVER: 8

Comments: See attachments



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May 11, 2001

Jose A. Lopcz, Public Hearing Officer  
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Michigan Department of Transportation  
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DELIVERED VIA EMAIL & FAX

RE: I-94 Rehabilitation Project (DEIS) Draft Environmental Impact Statement

Attached are my comments for the City of Detroit, Planning and Development Department, regarding the referenced subject. I have also included a map of development projects along the I-94 corridor.

Sincerely

*Donald-Ray Smith*

Donald-Ray Smith  
Principal City Planner

drs/DRS

cc: S. Green (DPW)  
A. Nwankwo (Parsons Brinckerhoff)



May 10, 2001

Donald-Ray Smith  
Principal City Planner

City of Detroit  
Planning and Development Department (P&DD)  
Planning Division

**I-94 Rehabilitation Project DEIS (Draft Environmental Impact Statement)**

Comments concerning the Build Alternative

It is vital to the City of Detroit that I-94 continues to provide a safe and effective means of transportation to the community, the City of Detroit and the region well into the 21-century. It is clear that the Interagency Coordination Committee (the "ICC") has continued to challenge MDOT's consultants to develop alternatives that do not impact the communities adjacent to I-94, but still meets the growing demand the region has on the interstate system.

Review of the alternatives suggests that the Build Alternative will give the City of Detroit and the region increased flexibility to meet the transportation challenges it will face in the coming decades. The Build Alternative has several long-range benefits included in the proposed design. They are as follows:

- Improvements to the I-94/M-10 and I-94/I-75 interchanges,
- Inclusion of right-of-way for a transit option, still to be determined,
- Removal of all the left-hand exit ramps,
- Additional lanes for increased capacity,
- Separation of local and through traffic, and
- Increased accessibility and aesthetics

However, the report identifies several impacts the proposed Build Alternative would have on the community and the City of Detroit. These impacts can be mitigated as the project moves forward in the final design phase of the project. Discussion and development of acceptable mitigation measures and alternatives that are compatible with the Build Alternative should be continued with the public, the City of Detroit (and its departments) and the ICC. Identified below are impacts caused by the proposed Build Alternative and compatible alternatives, requiring further discussion:

1. **Transportation Systems Management** – The inclusion of Transportation Systems Management (TSM) can exponentially increase the usefulness, safety and longevity of the Recommended Alternative. Installation of the hardware for TSM, specifically, Intelligent Transportation Systems (ITS), should be completed during the construction of the alternative.
2. **Transit Options** – The Build Alternative includes a transit option, which is a great benefit to the region

and community. Light Rail, Bus Rapid Transit and other options can be included in the design in the future. It would be beneficial to identify and understand any limitations the construction of the right-of-way for the transit option has on the operation, funding or ownership of a future transit system.

3. **Mainline Design Speed** – The design, posted and desired speed of commuters can be difficult to forecast and control. The design of Interstate 696 and current speed limit enforcement issues are an example of this issue. Speed also affects the desired speed of commuters on adjacent service drives, noise levels adjacent to the interstate and the severity of accidents. The design speed of the Recommended Alternative should be evaluated (reduced) to limit the disadvantages associated with over-designing the alternative.
4. **Continuous Service Drive** – There are several concerns with the continuous service drive (the "CSD"). One of the concerns focuses on the impact the CSD would have on the adjacent residential communities. The width and limited access of the proposed CSD might promote higher commuter speeds. Resulting in the increase of noise levels and decreasing pedestrian safety. Reducing the lane width and providing signalized crosswalks could be investigated to reduce commuter speed.

The width of the multi-use lane could also be reduced temporarily, to study the effects of a narrower pavement width. Additional margin width between the curb and sidewalk could be added to enhance the pedestrian area.

Traffic access into the adjacent residential neighborhoods from the CSD could be reduced, as suggested, by cul-de-sacs and landscaped areas/walls. Maintenance, snow removal, refuse removal and law enforcement of these areas will require additional input from MDOT, Detroit Police Department and the City of Detroit, Department of Public Works (DPW).

5. **Noise Barriers** – Noise abatement measures should be provided for residents that live, work or attend schools in areas along the freeway corridor where noise barriers are not being proposed. As currently proposed noise abatement will not be provided in neighborhoods where a \$30,000 cost criteria for being reasonable and feasible is exceeded. The use of noise barriers should not be disregarded until assessments and studies can be made after the alternative is constructed.
6. **Drainage and Water Quality** – The Recommended Alternative should include storm water retention and treatment designs, during construction and in the final design. The design period of the project and the current condition of Detroit's sewerage system can not be assumed to remain "as is" for the design-life of this project. Water quality and storm water issues for the Detroit are a regional concern.
7. **Displacement of Woodbridge Historic District, United Sound Systems Recording Studios** – The impact the Build Alternative has on the Woodbridge Historic District and the United Sound Systems Recording Studio should be reviewed with continued community interest a priority.

8. **Pedestrian Bridges and Pedestrian Safety** – Pedestrian safety and pedestrian access across the Build Alternative is very important to the community and can have economic effects to local businesses. Pedestrian walkways, crosswalks and bike lanes should be included into the alternative wherever possible. Aesthetics should be included into the design of the pedestrian bridges, not only for the interstate motorist but for the pedestrians. Pedestrian mobility will seriously be restricted through the elimination of current pedestrian bridges, and the inclusion of the cul-de-sac design.
9. **Traffic Impacts, DPW Facility** – Any concern DPW has regarding the impact that the alternative would have on the operation of its facility should be documented, and addressed as part of the mitigation measures.
10. **Air Quality Monitoring** – Data should be applied from monitoring stations along or near the project area. Monitoring data used in the DEIS was taken from a Livonia monitoring station. It seems reasonable that air quality would be impacted in the project area by increased traffic and congestion.

Potential improvements concerning the current DEIS

1. Explore the feasibility of scaling back the preferred "Build Alternative". There would be less displacement and construction impacts; creating funding that could be used for potential mass transit. This balanced approach is supported by the 1990 (City of Detroit) Master Plan of Policies. Policy 203-42, pp. II-77 notes: "Considering the transit system as a public utility much like electricity, gas and water . . . and . . . as an adjunct to the traffic system. Utilizing earmarked trafficway funds on the basis of transit freeing trafficway space and better management of the trafficway system." This coincides with the concept of flexible (flex) funding, which is particularly relevant for highway projects such as the I-94 rehabilitation project and its impact on future mass transit initiatives. It is also consistent with recent transportation funding legislation (i.e. The Intermodal Transportation Efficiency Act (ISTEA, 1991) and The Transportation Equity Act for the 21<sup>st</sup> Century (TEA 21, 1998).
2. It is recommended that the future center multi-modal lanes be moved to the outside (curb) lane of the service drives. Such a configuration would be pedestrian friendly, and is more accommodating for potential mass transit stations and transfers. Use of this approach may require the elimination of at least one driving lane on both the east and west service drives. A benefit is that only two lanes of through traffic, with accompanying side walks, would discourage potential speeding. The reserved multi-modal space should be sufficiently landscaped and buffered from the surrounding land uses.

3. The Planning Division "Urban Design Unit" requires additional plans indicating the extent of the R.O.W. (Right-of-Way) on adjacent land parcels to be absorbed by the project, so they can study the physical impact realistically.

A portion of the I-94 project crosses through the lower and middle Woodward areas which is the location of Detroit's principal cultural and institutional establishments, (as well as) an important business and residential corridor. This area would benefit from an urban design that enhances the immediate and surrounding environment.

4. Recommend a special I-94 freeway R.O.W. treatment between the Lodge and I-75 freeway's to highlight its passage through the University-Cultural Center, the Art and Medical Centers at the lower Woodward area, and also to highlight its passage through the Harper-Brush residential area and the New Center Business sections in the middle Woodward area.

#### Development Projects within the project area

The following current and proposed development projects lie within a half (1/2) mile buffer, along the I-94 Rehabilitation Project corridor:

- ▶ West Pointe Homes (I-94 to the south, Epworth to the west, Tireman to the north and Beechwood to the east) - scattered site of residential homes (approx. 60 units)
- ▶ Thyssen Steel - expansion of existing steel factory on land currently used for the Atkinson playfield. P&DD is working with DEGC to acquire additional property for the playfield replacement project.
- ▶ Core City Neighborhoods - in-fill residential development project within the boundaries identified on attached map. Immediately south of shaded area is the Jeffries Hope VI project which consists of mixed-income residential development on the existing project site and scattered in-fill in the areas bounded by Warren, Jeffries Freeway, Fisher Freeway and Lodge Freeway.
- ▶ Habitat for Humanity (Core City) - residential development for low to moderate income households. Project area is bounded by Michigan Ave., W. Grand Blvd., M.L. King Blvd., and the Jeffries Fwy.
- ▶ Virginia Park Development Plan - Redevelopment Plan just north of the I-94 project area. Plan is being modified and land should be available for disposition in the Fall, 2001. Proposed project consists of residential developments (scattered site and contiguous projects, where appropriate) throughout designated development plan area.
- ▶ North Village aka New Amsterdam Project (Woodward Ave. and Burroughs) - consists of the rehabilitation of five buildings into residential, retail/commercial and parking along with the

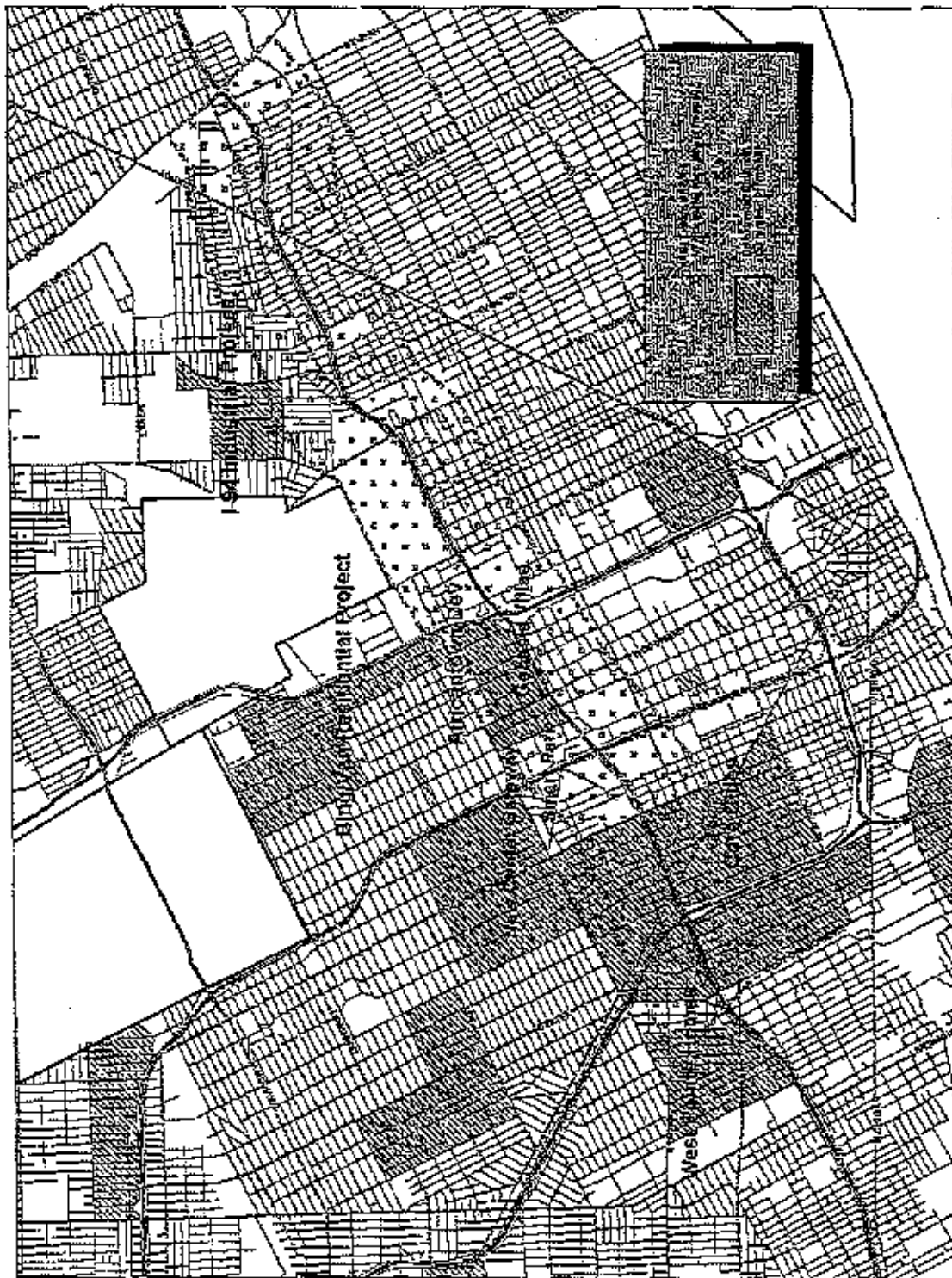
Development Projects within the project area (continued)

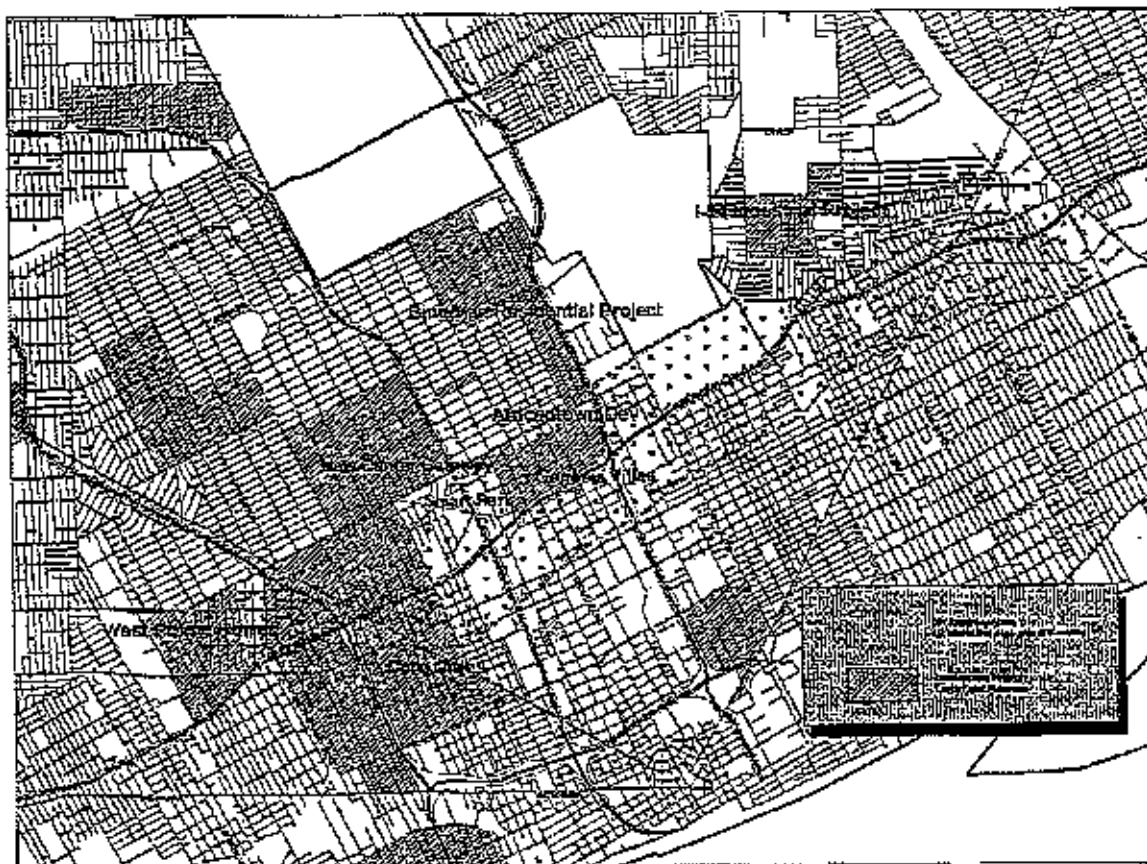
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construction of new loft residential and commercial space. In total, the project will produce approximately 60,000 sq. ft of retail/commercial space, 237 units of rehabilitated housing, 153 newly constructed housing units and 361 parking spaces.

- ▶ New Amsterdam/Gateway/Smart Zone (Tech Park)- The sponsors of the smart zone" research and technology park in the vicinity of Wayne State University (WSU) and Detroit's New Center District. In the first phase, the former Chevy Creative Services Building would be renovated into Tech Park One, comprised of 34,000 square feet of research and technology incubator space, 11,000 square feet of businesses assistance agencies and 73,000 square feet of multi-tenant space. The WSU/City of Detroit Smart Zone Project is a great opportunity to develop a certified technology park within the City of Detroit and have it affiliated with one of Michigan's premier research institutions. Project is bounded by Warren Ave. to the north and Forest Ave. to the south.
- ▶ Picty Hill (bounded by Pingree, Woodward, Russell and Grand Trunk railroad right-of-way) - in-fill residential housing project targeted toward low and moderate income households.
- ▶ Africantown Development - proposed retail/commercial development. Area specific sites have not been identified, to date. Project area is E. Grand Blvd and Hastings.
- ▶ Bing/Van Residential Development (see attached map) - scattered site in-fill residential project.
- ▶ Forest Park (Mystery Tenant) - developer cannot disclose tenant until site plan review process is initiated. Tenant is a high tech light manufacturing/warehouse facility on the Forest Park site currently being leased to Greektown Casino for parking.
- ▶ I-94 Industrial Park Project - a total of 2.2 million square feet of warehouse/industrial buildings. The industrial park will comply with the Michigan Economic Development Corporations standards for a Modern Industrial Park certification (meaning landscaping, modern amenities, and special land use restrictions). Project is bounded by Grinnell and Huber to the north; Mount Elliott to the west; Miller to the south; and St. Cyril to the east.
- ▶ Genesis Villas (see attached map) - three phase townhouse development project. Over 120 units of new construction low to moderate in-fill housing development.

Lastly, the I-94 Rehabilitation Project is a significant transportation project with impacts to both the community and region. These impacts should continue to be mitigated through continued engineering design and community input.





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Friday, 11 May 2001

VIA US MAIL AND VIA FACSIMILE (Total number of pages, including this page: **TEN**)

Jose A. Lopez, Public Hearings Officer  
Bureau of Transportation Planning  
MICHIGAN DEPARTMENT OF TRANSPORTATION  
PO Box 30050  
Lansing, MI 48909  
517/373-9534 (voice)  
517/373-9255 (fax)

re: Michigan Department of Transportation (MDOT) "I-94 Rehabilitation Project Draft Environmental Impact Statement and Section 4(f) Evaluation" [hereinafter referred to as "subject DEIS"]

Dear Mr. Lopez:

This letter contains comments on the subject DEIS and is submitted to you for inclusion within the record of public comments regarding the subject DEIS. The comments have been prepared at the request of two citizen groups: Michigan Association of Railroad Passengers, Inc. and Transportation Riders United, Inc. The comments contained herein supplement the comments that those two organizations have already delivered to you and/or will be delivering to you before the comment deadline, which I understand is 11:59 pm today.

The comments are as follows:

**(0) Introduction**

The proposed project reviewed by the subject DEIS is estimated by MDOT to involve an estimated investment of **\$1.244 BILLION** [p. 4-38].

MDOT states [p. 4-38] that this **\$1.244 BILLION** project consists of the following elements:

Construction	\$950 million
Right-of-Way	\$56 million
Design and Construction Engineering	\$238 million

MDOT further states that of the \$950 million portion of the project accounted for by "Construction", 20 percent is "...for traffic control" [p. 4-38]. It appears that virtually all of that 20 percent, i.e., \$190 million, is for control of traffic during the construction process.

The project limits are the Jeffries I-96 Freeway on the west and Conner Avenue on the east [p. 1-3]. The total length of the I-94 segment involved in the project is reported by MDOT to be 6.7 miles [p. 1-1]

This project appears to be largest dollar value project ever considered by MDOT. Although it appears that MDOT did not disclose in the subject DEIS the time period required by the project's construction phase. Judging from the \$190 million amount allocated to "traffic



control" it appears that the construction phase impacts on the public which uses the segment addressed by the subject DEIS will extend over two to ten years and will be rather significant.

(1) Scope of the DEIS

The subject DEIS pertains to only a part of MDOT's plans for expanding I-94 in metropolitan Detroit.

The Federal Highway Administration [FHWA] and MDOT have for more than ten (10) years been discussing and planning the reconstruction of I-94 across the entire City of Detroit. An MDOT-authored document which is dated 1990 and which is the subject DEIS's reference list [as the third listing from the bottom of page 11-1], clearly reveals MDOT's intent to widen I-94 across the City of Detroit and through several outlying suburbs. An article appearing on pages 1C and 2C of the Detroit News for Sunday, February 24, 1991 states that MDOT's plans at that time called for the

*"six-lane Ford freeway [i.e., I-94] to be widened to eight lanes, which will require demolishing all existing bridges from 13 Mile Road in Macomb County to Michigan Avenue at the Dearborn-Detroit city boundary."*

Further, MDOT's "5 Year Road & Bridge Program: Vol III - 2001 to 2005" released in January 2001 by MDOT's Director, states the following on page 81 regarding the context of the project identified in the subject DEIS:

*"I-94, I-96 to Connor Avenue. This project is the first phase of a larger project to rehabilitate two projects; I-94 between Wyoming Avenue in the city of Detroit and I-696 in Macomb County. I-94 in Detroit was identified in an MDOT planning study entitled "The Greater Detroit Area Freeway Study as the freeway in greatest need of improvement. The objective is to address the deterioration of the facility due to age and outmoded design. The Draft Environmental Impact Statement (EIS) is being finalized and is expected to be completed in early 2001. A Final EIS should be completed later in 2001. Building Michigan III contains additional funding for design."*

An MDOT Transportation Map received from MDOT during February 2001 indicates that the I-94 interchanges identified above are encountered in the following sequence when traveling from west to east and are at the following I-94 mileposts:

Michigan Avenue	210
Wyoming Avenue	210
Jeffries Freeway (I-96)	213
Conner Avenue	220
Reuther Freeway (I-696)	229
Thirteen Mile Road	232

In summary, the I-696/Conner segment of I-94 is wholly within the larger I-94 segments described in the 1990 MDOT report identified above, again in the 1991 Detroit News article referred to above, and most recently in the 2001 MDOT report identified above.

If MDOT's plans are delimited as indicated in MDOT's 2001 report quoted above, the total length of the I-94 widening project will be approximately 19 miles, not the 6.7 miles reported by MDOT in the subject DEIS.

FHWA regulations clearly require compliance with CEQ regulations, which state at 40 CFR 1502.16 that a DEIS shall enumerate the "indirect effects and their significance". The CEQ regulations at 40 CFR 1508.8 further refer to indirect effects as effects which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable."

CEQ regulations at 40 CFR 1508.25 also require that both "cumulative actions" and "cumulative impacts" be included within the scope of a DEIS.

Clearly, the extension of the expansion of I-94 beyond the physical limits described in the subject DEIS is reasonably foreseeable. Although Section 5.15.2 (8 lines long) on page 5-94 of the DEIS circuitously and vaguely acknowledges that the proposed I-94 expansion will ultimately go beyond the limits described in the subject DEIS, the DEIS is deficient in not addressing the indirect and cumulative impacts associated with the totality of the expansion project rather than just the part identified in the subject DEIS.

**(2) Alternatives including proposed action**

The DEIS also is deficient inasmuch as it reviews only a limited number of alternatives to the proposed action and in that it does not review a host of reasonable alternatives. FHWA views the term "reasonable alternatives" rather broadly in its advice to state departments of transportation engaged in preparing environmental impact statements...

*The following range of alternatives should be considered when determining reasonable alternatives: (1) 'No-action' alternative...(2) Transportation System Management (TSM) alternative...(3) Mass Transit... [Attachment pages 14 and 15 from FHWA Technical Advisory T 6640.8A dated 30 October 1987]*

Consistent with FHWA's advice, it appears that there are a number of mutually exclusive alternatives that could have been reviewed in the DEIS but were not. These include, in no particular order, the following:

- (1) Widening of I-94 by one lane in each direction only between the following two interchanges, without new service drives and without major interchange modifications:

<u>Interchange Name</u>	<u>Milepost</u>
Jeffries Freeway (I-96)	213
Chrysler Freeway (I-75)	216

- (2) Widening of I-94 by one lane in each direction only between the following two interchanges, again without new service drives and without major interchange modifications:

Lodge Freeway (M-10)	215
Chrysler Freeway (I-75)	216

- (3) Exclusion of the "Multi-Modal" lanes in the center of the proposed expansion and use of the investment avoided in those lanes to establish improved public transportation in an alignment that is parallel to and within a mile or two of I-94,

with the included public transportation improvements to include but not be limited to part or all of the Mount Clemens-Detroit-Ann Arbor commuter rail service identified in an MDOT-sponsored study published during 1997.

- (4) Conversion to a boulevard of Warren Avenue [which is roughly parallel to and approximately a half mile from the I-94 right-of-way along most of the I-94 route between Wyoming Avenue and Moross Road] where it is not already a boulevard, using the construction cost savings to rehabilitate-in-place or to replace and relocate to the many vacant lots in the vicinity of Warren Avenue the residences and businesses that would be impacted by the conversion of Warren Avenue to a boulevard throughout its length.
- (5) Improvement of public transportation in Warren Avenue, which at least during the early 1950's was one of the primary and more popular electric bus routes in the City of Detroit
- (6) Improvement of the traffic controls on the existing surface streets in the vicinity of and generally parallel to the I-94 alignment for the purpose of improving traffic flow and enticing some I-94 traffic flow to use alternative routes
- (7) Expansion and change in function of MDOT's "Freeway Courtesy Patrol". This service appears to have been originally established several years ago only to assist stranded motorists, not to mitigate collision- or breakdown-induced congestion. It appears that MDOT is only beginning to...
  - consider the service's reorganization so it becomes a congestion-mitigation service
  - equip Freeway Courtesy Patrol vehicles with radios so the drivers of these vehicles can be dispatched by MDOT's traffic control center [also known as MDOT's Michigan Intelligent Transportation Systems (MITS) headquarters] to locations where they are needed to assist disabled vehicles
  - consider the substitution of tow trucks for some or all of the courtesy vans

Traffic Technology International published on pages 38 and 39 of its April/May 2000 issue an article about the Los Angeles area's Freeway Service Patrol [FSP], which is managed by the California Highway Patrol and the California Department of Transportation's (CalTrans') Transportation Management Center. According to the article, the FSP is budgeted at \$26 million per year and involves the deployment of 150 contracted tow trucks which are operated during peak traffic hours over 411 miles of the most congestion-prone freeways in Los Angeles County.

An FSP operation should be considered as a Transportation System Management (TSM) alternative to MDOT's proposed I-94 expansion.

- (8) MDOT asserts in the subject DEIS that

*"Finally the costs of the No-Build alternative do not recognize the opportunity costs associated with not increasing the capacity of I-94 to meet the needs of growing regional and international trade..." [p. 4-38]*

The subject DEIS continues by referring to the importance of Michigan's exports to Canada. Given that MDOT justifies in part the proposed I-94 expansion by

referring to the need to accommodate international trade with Canada, it would have been appropriate for MDOT to consider in the subject DEIS the TSM alternative of expediting customs clearance procedures on both sides of the City of Detroit's highway crossings to Canada. It appears that the reduction in truck transit time across the highway segment dealt with in the subject DEIS will not be more than 5 or 10 minutes for those trucks using I-94 during the morning or afternoon peak travel hours. That reduction is meaningless if the driver of the vehicle must wait a half hour or longer to clear customs at and pass through one of the nearby international crossings. A strong plea for international crossing customs clearance improvements was made by Michael Kergin, Ambassador of Canada to the United States during his address on 30 April 2001 to the Economic Club of Detroit.

The TSM alternative of expedited customs clearance might decrease international truck movements' travel time much more significantly than implementation of MDOT's selected alternative.

- (9) Given MDOT's assertion that freight traffic movements are a major concern justifying the proposed I-94 expansion [pp. 4-38 and 4-39], it would have been appropriate for MDOT to have considered as an alternative to its selected alternative the expansion of existing rail-highway intermodal freight terminals and the development of new rail-highway intermodal freight terminals as an alternative to continued highway expansion. MDOT has been working on developing intermodal freight improvements in Detroit for about ten years. There are a variety of locations available for such terminals so as to remove some truck traffic from I-94. MDOT's approach in the subject DEIS ignores entirely its existing and future work on improving rail-highway intermodal facilities.
- (10) Given MDOT's statement regarding the importance of accommodating truck movements as a justification for the proposed I-94 expansion [pp 4-38 and 4-39], MDOT also should consider as an alternative to the I-94 expansion proposal its participation in constructing or expanding an intermodal freight railroad service in the I-94 corridor. Two railroad companies, CP Rail/Expressway and Norfolk Southern/Triple Crown Services, already have made major investments in such services in the Detroit area. For information on these services see the following internet web sites [[www.cpr.ca/expressway](http://www.cpr.ca/expressway); [www.triplecrownsvc.com](http://www.triplecrownsvc.com)].

Fuel consumption associated with the transport in a railroad train of the RoadRailer trailers employed by the Norfolk Southern/Triple Crown Services is reported to be seventy five percent (75%) less than when the trailer is hauled over a highway. Significant fuel consumption savings also are achieved by the CP Rail's "Expressway" service.

Other railroads may have significant intermodal service terminals in the Detroit area, but those are not as technologically and environmentally advanced as the Norfolk Southern and CP Rail services referred to above.

- (11) Government support for an intermodal freight service extending from Montreal to Toronto to Detroit to Chicago and then Mexico was hypothesized in a report dated February 21, 2001 that is entitled "North American Trade and Transportation Corridors: Environmental Impacts and Mitigation Strategies", that was prepared on 21 February 2001 for the North American Commission for Environmental

Cooperation [CEC] and that is available on the CEC's web site, <http://www.cec.org>. Section 4.3 of that report, entitled "Toronto-Detroit Corridor", is of particular interest. Again, given MDOT's statements in the DEIS that I-94 expansion is required for truck traffic because of expanded commerce, especially with Canada, MDOT should review the CEC-identified option as an alternative in as much detail as MDOT's preferred alternative.

- (12) A variety of alternatives should be considered for traffic management during the construction phase of the proposed project. As it stands, MDOT appears to be proposing the construction of service drives whose width is dictated partly or totally by the traffic volumes that MDOT plans to detour onto those service drives while the main part of the freeway is reconstructed [pp 1-15, 1-16, 2-16]. As noted above, it appears that MDOT anticipates an expenditure of \$190 million for traffic control during construction. The DEIS does not evaluate alternatives for construction phase traffic management. Alternative, including but not limited to a commuter rail service on parallel railroad facilities, should be considered for the purpose of mitigating congestion during the construction phase.

### (3) Environmental and other impacts

The DEIS does not review at all or does not adequately review a number of essential facts and environmental impacts. These facts and impacts include the following:

(3.1) The duration of the proposed construction project appears to not be discussed at all in the DEIS. MDOT justifies the proposed action in part by asserting that it will reduce congestion on the existing facility and that the reduced congestion will reduce energy consumption and pollutant emissions into the atmosphere.

However, as noted above, the project will be underway for many years, at least two and possibly ten years. Further, it must be recognized that travel times will increase for the users of I-94 during the entirety of the construction period.

Whereas it appears the benefits of the expanded I-94 facility generally will accrue only to the peak-hour traffic, which may constitute only 30% of the total daily traffic, the adverse impacts of the multi-year construction process will no doubt impact a much higher percentage of the I-94 traffic, possibly 100%. We don't know from the DEIS how much of the I-94 traffic will be impacted.

If the construction process continues for ten years and affects 100% of the traffic, and if the planning horizon is 25 or 30 years or 40 years (including the construction period which could be as long as 10 years), it is quite possible that in the aggregate the benefits from the selected alternative for the peak hour travelers after construction is complete will not exceed the disbenefits imposed on all the travelers during the construction period.

(3.2) Construction process dust and diesel emissions are not compared in any way with the change in pollutant emissions associated with the expanded highway. It is possible that in the aggregate these will exceed any reductions from current levels, if any, that accrue after construction is completed.

(3.3) The elimination of a presently unused railroad bridge across the Chrysler Freeway that is located just north of I-94 appears to be planned for demolition without replacement as a part of MDOT's proposed project. MDOT or another organization, possibly a railroad, recently repainted this structure. In addition, the "Downtown Detroit to Metro Airport Rail Study",

completed this year for the Southeast Michigan Council of Governments (SEMCOG), anticipated the use of that railroad bridge for access to the east side of the Detroit Central Business District. The DEIS should be amended to address that issue and to either rescind the removal of the bridge or establish mitigation measures to counteract the deleterious impacts of the bridge's removal on the prospective public transportation service to the airport.

(3.4) The economic impact on the City of Detroit has not been adequately addressed. One of the economic impacts on the City of Detroit is established by Michigan law, which at MCL 247.651c requires that the City of Detroit pay a part of the project costs. MDOT has not disclosed in the DEIS the amount of that share as a percentage of the total cost for each of the alternatives.

(3.5) MDOT is making an incomplete disclosure when it suggests that one justification for the I-94 expansion project is the inferior vertical clearances of bridges over the I-94 pavement. On page 1-3 of the DEIS states that "the vertical clearances at many of the overpass structures are less than the current MDOT minimum standard of 14.5 feet." However, I believe that the so-called "standard" is not a statutory standard, but rather an internal MDOT policy consistent with American Association of State Highway and Transportation Officials policy recommendations. MDOT should disclose that fact and the fact that the Michigan Vehicle Code requires trucks operating on the Michigan highways to be not more than 13.5 feet high unless granted a special MDOT permit to have a greater overall height. Further MDOT should reveal that MDOT does not have authority to charge special tolls to permittees of over-height vehicles and that the added construction cost of accommodating such vehicles is passed on to highway users in general.

Further, if MDOT believes that the need to achieve increased bridge clearances is a critical factor in the justification for proceeding with the selected alternatives, then the DEIS is deficient in not evaluating other alternatives to achieve increased bridge clearances, including but not limited to depression of the roadway surface at locations where bridges cross over I-94 and the change of the pavement design under bridges to attain a lesser pavement thickness.

(3.6) MDOT essentially has asserted in the DEIS that selection of the "no-build" alternative will have dire economic consequences on the region.

*"Not maintaining I-94 as a viable trade route, will itself generate substantial costs in terms of foregone economic opportunity" [p. 4-39]*

Given that MDOT has raised the hypothesis, it is obliged to thoroughly review it. I understand that MDOT since 1995 has sponsored or participated in two truck surveys at the two international highway crossings in Detroit and that these surveys have yielded some information on the originations and destinations of the trucks using those crossings. The extent to which that traffic uses the I-94 segment between I-96 and Conner should be disclosed.

United States-Canada Bridge and Tunnel Operators Association truck traffic information for the highway crossings between southeastern Michigan and Canada is summarized for the calendar years 1995 through 2000 on an attachment to this letter. That summary shows the following:

- truck traffic using the Detroit-Windsor Tunnel is declining precipitously and during CY2000 was 182,392 [about 250 trucks per direction per day]

- truck traffic using the Ambassador Bridge is increasing, but since CY 1999 at a much slower rate, and during CY2000 was 3,486,110 [about 4,800 trucks per direction per day]

As far as the Ambassador Bridge is concerned, it appears from a cursory review that probably only 20 percent of the Ambassador Bridge truck traffic also travels on the segment of I-94 located east of I-96. That gives us 960 trucks each day on each direction of the I-94 segment proposed for reconstruction. If 30% of these trucks travel during the morning or afternoon peak hour, we appear to be accommodating fewer than 300 truck movements per direction per day with the proposed I-94 expansion.

In any event, MDOT needs to critically evaluate the hypothesis it has presented.

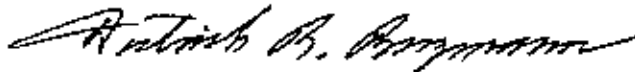
(3.7) Although MDOT claims that aesthetic improvements are associated with the preferred option [p. 5-95], there is nothing intrinsically aesthetic that is associated with MDOT's preferred alternative. MDOT for years has neglected to undertake both aesthetic and functional maintenance of I-94 in the City of Detroit. About one month ago the press reported that the Mayor of Detroit saw fit to complain in writing to MDOT about the debris that MDOT has allowed to accumulate on the MDOT's freeways within the city limits. Concrete in bridge structures which are above I-94 and which are now being repaired has fallen onto cars traveling onto I-94 below. Just within the last week, another piece of I-94, this one at Greenfield, collapsed, blocking peak hour traffic for one or two days while temporary repairs were undertaken.

(3.8) The traffic analysis modeling procedure employed has yielded the curious result that the level of service associated with the I-94 "Enhanced No-Build Alternative" will not be any better than the level of service associated with the I-94 "No-Build Alternative" [p. 4-33], notwithstanding the fact that the "Enhanced No-Build Alternative" would include "new auxiliary lanes and acceleration/deceleration lanes" [p. 4-19]. Regrettably, the DEIS does not fully describe the "Enhanced No-Build Alternative", as it does MDOT's preferred alternative. MDOT should include in a supplement to the DEIS aerial maps with overlays for the "Enhanced No-Build Alternative", similar to the aerial maps with overlays provided in Section 13 of the DEIS for MDOT's preferred alternative.

(3.9) It appears that the traffic analysis assumes the entire street network except the I-94 right-of-way and associated service drives to be static. The traffic analysis should be redone assuming changes outlined above to comprehensively evaluate the efficacy of the each alternative.

Respectfully,

RAILWAY SYSTEMS ENGINEERING CORPORATION



Dietrich R. Bergmann, PhD, PE,  
President

Enclosures:

- (1) Article entitled "Freeing Up the Freeways", published on pages 38 and 39 of the April/May 2000 issue of Traffic Technology International [1 sheet]
- (2) Chart entitled "Total Truck Movements on Highway Crossings Between Southeast Michigan and Ontario", prepared on 11 May 2001 by D. R. Bergmann [1 sheet]



$\mathcal{P}_{11} + 4\mathcal{P}_{12} + 11\mathcal{P}_{13} + 14\mathcal{P}_{14}$   
 $\mathcal{P}_{22} + 4\mathcal{P}_{23} + 11\mathcal{P}_{24} + 14\mathcal{P}_{25}$

[illegible]

There are a number of reasons why the "one-size-fits-all" approach to the treatment of depression is not always the best. First, the symptoms of depression can vary greatly from person to person. Some people may experience only mild symptoms, while others may experience severe symptoms that significantly impact their daily lives. Second, the underlying causes of depression can also vary. Some people may have a genetic predisposition to depression, while others may have experienced a traumatic event or have a chronic medical condition that contributes to their depression. Finally, the effectiveness of different treatments can vary depending on the individual. Some people may respond well to medication, while others may respond better to psychotherapy or a combination of the two.

are assigned to 40 min-hour morning hours, replacing the bullet. Most commuters in the 40 min-hour of Los Angeles County's 427 miles of freeways. Their morning, 427 miles, keep driving in two-hour, 427-mile morning. It is, at least, to be replaced by an estimated budget of \$1.5 billion. For the 427 million, representing a class, a possible solution to traffic technology, at least, and alternative widening and building new highways, as they may, of which and congestion threat to the city.

—The administration is considering new fare hikes for Washington's existing routes as the only kind of revenue-raising effort, says the American Automobile Highway Patrol. The group would need, in its support.

And that," he adds, "means people leaving the table and breakdowns outside the lanes. A year in our lane is a three-year process in reality, that means you're not really the same lane as you were a year ago. Our 42¢ is per cent, we might

$$\|R_{k+1}\|_{\infty} \leq \|R_k\|_{\infty} + \frac{1}{2} \frac{\|R_k\|_{\infty}^2}{\|R_k\|_{\infty} + 1} \leq \frac{1}{2} \|R_k\|_{\infty}^2$$
[illegible]

Many hands ...

Running alone each year since a 1938 mile knockout, solvent sales accounts for the 15th, 14th, 13th, 12th, 11th, 10th, 9th, 8th, 7th, 6th, 5th, 4th, 3rd, 2nd, and 1st places. What solvent sales are left a dozen dual- and triple-purpose computer washers, and their derivatives at 11. All over the place. Looked at the water in the tank, and it was not going to run. Not a drop.

## Fiber Optics: The Superior Way Of Axle Sensing



**Abstract**

With three optic aids, leaders may be able to target about most of the problems you had to cope with until now. Forget about electrical problems. There is no electricity. There is also no metal, so forget about corrosion and lightning. Forget about vibrating pavements. Their leaders respond to nothing else but pressure from above. They are safely sealed inside of the pavement, protecting a lot even surfaces to forget about moisture, rust, noise and snow ploughs. Forget also about limiting problems: no minimums, no maximums, no speed limits, no weight limits, no delivery slant programs, so you can monitor events as they happen in real time, and they are never required.

Forget about everything - but do try to get to get to them.

For more information, contact the publisher at 1-800-352-9697 or visit our website at [www.mhprofessional.com](http://www.mhprofessional.com).

1. *Chlorophyll a* (Chl *a*)

For every inch of tow, the best driver skills are a fast, powerful, maneuverable Mustang. And, from obstructing services and increasing safety, the Mustang is a proven winner.

hypercardinal parameters, life span. No significant interaction was observed between life span and any tractable personality parameter.

Private must be paid, left in a quick fix, the problems and written down administered by the California Highway Patrol. Additionally, a Governor's award's reward must be paid of \$25,000 where felons drug use, drug dealing, violence, sexual abuse and other problems. Mandating what is the 50th anniversary of the 1960s and the 50th anniversary of the 1960s. Trucks must be as quickly when possible. Minimum truck size is three-quarters ton and must, must be a home for a

[illegible]

toxic gas and vapors, including air compressor air pressure, refrigerant leaks and welding fumes, a clean cap on their lock, which can stop. Charts for engine exhausts, valves and big holes of metal are given out, and the following are listed: 1. 2000-2000, 2. 2000-2000, 3. 2000-2000, 4. 2000-2000, 5. 2000-2000, 6. 2000-2000, 7. 2000-2000, 8. 2000-2000, 9. 2000-2000, 10. 2000-2000, 11. 2000-2000, 12. 2000-2000, 13. 2000-2000, 14. 2000-2000, 15. 2000-2000, 16. 2000-2000, 17. 2000-2000, 18. 2000-2000, 19. 2000-2000, 20. 2000-2000, 21. 2000-2000, 22. 2000-2000, 23. 2000-2000, 24. 2000-2000, 25. 2000-2000, 26. 2000-2000, 27. 2000-2000, 28. 2000-2000, 29. 2000-2000, 30. 2000-2000, 31. 2000-2000, 32. 2000-2000, 33. 2000-2000, 34. 2000-2000, 35. 2000-2000, 36. 2000-2000, 37. 2000-2000, 38. 2000-2000, 39. 2000-2000, 40. 2000-2000, 41. 2000-2000, 42. 2000-2000, 43. 2000-2000, 44. 2000-2000, 45. 2000-2000, 46. 2000-2000, 47. 2000-2000, 48. 2000-2000, 49. 2000-2000, 50. 2000-2000, 51. 2000-2000, 52. 2000-2000, 53. 2000-2000, 54. 2000-2000, 55. 2000-2000, 56. 2000-2000, 57. 2000-2000, 58. 2000-2000, 59. 2000-2000, 60. 2000-2000, 61. 2000-2000, 62. 2000-2000, 63. 2000-2000, 64. 2000-2000, 65. 2000-2000, 66. 2000-2000, 67. 2000-2000, 68. 2000-2000, 69. 2000-2000, 70. 2000-2000, 71. 2000-2000, 72. 2000-2000, 73. 2000-2000, 74. 2000-2000, 75. 2000-2000, 76. 2000-2000, 77. 2000-2000, 78. 2000-2000, 79. 2000-2000, 80. 2000-2000, 81. 2000-2000, 82. 2000-2000, 83. 2000-2000, 84. 2000-2000, 85. 2000-2000, 86. 2000-2000, 87. 2000-2000, 88. 2000-2000, 89. 2000-2000, 90. 2000-2000, 91. 2000-2000, 92. 2000-2000, 93. 2000-2000, 94. 2000-2000, 95. 2000-2000, 96. 2000-2000, 97. 2000-2000, 98. 2000-2000, 99. 2000-2000, 100. 2000-2000, 101. 2000-2000, 102. 2000-2000, 103. 2000-2000, 104. 2000-2000, 105. 2000-2000, 106. 2000-2000, 107. 2000-2000, 108. 2000-2000, 109. 2000-2000, 110. 2000-2000, 111. 2000-2000, 112. 2000-2000, 113. 2000-2000, 114. 2000-2000, 115. 2000-2000, 116. 2000-2000, 117. 2000-2000, 118. 2000-2000, 119. 2000-2000, 120. 2000-2000, 121. 2000-2000, 122. 2000-2000, 123. 2000-2000, 124. 2000-2000, 125. 2000-2000, 126. 2000-2000, 127. 2000-2000, 128. 2000-2000, 129. 2000-2000, 130. 2000-2000, 131. 2000-2000, 132. 2000-2000, 133. 2000-2000, 134. 2000-2000, 135. 2000-2000, 136. 2000-2000, 137. 2000-2000, 138. 2000-2000, 139. 2000-2000, 140. 2000-2000, 141. 2000-2000, 142. 2000-2000, 143. 2000-2000, 144. 2000-2000, 145. 2000-2000, 146. 2000-2000, 147. 2000-2000, 148. 2000-2000, 149. 2000-2000, 150. 2000-2000, 151. 2000-2000, 152. 2000-2000, 153. 2000-2000, 154. 2000-2000, 155. 2000-2000, 156. 2000-2000, 157. 2000-2000, 158. 2000-2000, 159. 2000-2000, 160. 2000-2000, 161. 2000-2000, 162. 2000-2000, 163. 2000-2000, 164. 2000-2000, 165. 2000-2000, 166. 2000-2000, 167. 2000-2000, 168. 2000-2000, 169. 2000-2000, 170. 2000-2000, 171. 2000-2000, 172. 2000-2000, 173. 2000-2000, 174. 2000-2000, 175. 2000-2000, 176. 2000-2000, 177. 2000-2000, 178. 2000-2000, 179. 2000-2000, 180. 2000-2000, 181. 2000-2000, 182. 2000-2000, 183. 2000-2000, 184. 2000-2000, 185. 2000-2000, 186. 2000-2000, 187. 2000-2000, 188. 2000-2000, 189. 2000-2000, 190. 2000-2000, 191. 2000-2000, 192. 2000-2000, 193. 2000-2000, 194. 2000-2000, 195. 2000-2000, 196. 2000-2000, 197. 2000-2000, 198. 2000-2000, 199. 2000-2000, 200. 2000-2000, 201. 2000-2000, 202. 2000-2000, 203. 2000-2000, 204. 2000-2000, 205. 2000-2000, 206. 2000-2000, 207. 2000-2000, 208. 2000-2000, 209. 2000-2000, 210. 2000-2000, 211. 2000-2000, 212. 2000-2000, 213. 2000-2000, 214. 2000-2000, 215. 2000-2000, 216. 2000-2000, 217. 2000-2000, 218. 2000-2000, 219. 2000-2000, 220. 2000-2000, 221. 2000-2000, 222. 2000-2000, 223. 2000-2000, 224. 2000-2000, 225. 2000-2000, 226. 2000-2000, 227. 2000-2000, 228. 2000-2000, 229. 2000-2000, 230. 2000-2000, 231. 2000-2000, 232. 2000-2000, 233. 2000-2000, 234. 2000-2000, 235. 2000-2000, 236. 2000-2000, 237. 2000-2000, 238. 2000-2000, 239. 2000-2000, 240. 2000-2000, 241. 2000-2000, 242. 2000-2000, 243. 2000-2000, 244. 2000-2000, 245. 2000-2000, 246. 2000-2000, 247. 2000-2000, 248. 2000-2000, 249. 2000-2000, 250. 2000-2000, 251. 2000-2000, 252. 2000-2000, 253. 2000-2000, 254. 2000-2000, 255. 2000-2000, 256. 2000-2000, 257. 2000-2000, 258. 2000-2000, 259. 2000-2000, 260

The ocean's colorful, lively creatures are also interesting to watch, swim, and breathe but no doubt you, and your dog, will enjoy the beach's sun, sand, and surf. For supplies, including towels, beach chairs, and beach toys, visit the beach stores or the beach shops. For a picnic, a picnic basket, a picnic blanket, and a picnic basket, visit the picnic stores or the picnic shops. For a picnic, a picnic basket, a picnic blanket, and a picnic basket, visit the picnic stores or the picnic shops.

Los Angeles' Tierney Service Center. As traffic increases, the firm and hospital are helping to keep drivers safe and that means saving.



# **TOTAL TRUCK MOVEMENTS ON HIGHWAY CROSSINGS BETWEEN SOUTHEAST MICHIGAN AND ONTARIO**

prepared on 11 May 2001 by D. R. Bergmann

Calendar Year	Ambassador Bridge		Detroit-Windsor Tunnel		Both Detroit Crossings		Blue Water Bridge		All Three Crossings	
	Trucks	% Change*	Trucks	% Change*	Trucks	% Change*	Trucks	% Change*	Trucks	% Change*
1995	2,218,599		267,187		2,485,783		1,178,730		3,664,513	
1996	2,476,360	11.62%	269,388	0.82%	2,745,748	10.46%	1,184,882	0.52%	3,930,610	7.28%
1997	2,697,176	8.92%	257,557	-4.39%	2,954,733	7.61%	1,289,897	7.16%	4,224,430	7.48%
1998	2,993,292	10.98%	241,271	-6.32%	3,234,563	9.47%	1,350,880	6.39%	4,585,423	8.55%
1999	3,428,151	14.53%	205,015	-15.03%	3,633,166	12.32%	1,495,325	10.69%	5,128,491	11.84%
2000	3,488,110	1.59%	182,392	-11.03%	3,668,502	0.97%	1,576,839	5.45%	5,245,341	2.28%

SOURCE: Year-end "Traffic Reports" prepared by the United States-Canada Bridge and Tunnel Operators Association

## **NOTES:**

- (1) Data in "% Change\*" columns are the percentages by which the number of truck movements in the given year increased (or decreased) from the number of truck movements in the immediately preceding year.
- (2) The tabulations shown above do not account for the highway trailer movements accommodated by railroads through the railroad tunnel between Detroit and Windsor and through the railroad tunnel between Port Huron and Sarnia. Railroads providing intermodal freight services through one or both of the two railroad tunnels include the following:  
CN Rail; CP Rail; Norfolk Southern; and possibly others
- (3) The tabulations shown above also do not account for US-Canada border crossings by trucks using St. Clair River ferry services.

Mr. Lopez.

I am a resident of Fourth Street. I am writing to object to the proposed widening of the 194-Lodge interchange.

2 years ago MDOT came up with a compromise plan that would handle more traffic and not destroy our neighborhood. 2 years go by and we are double crossed by MDOT. ok . . . .

NO MORE COMPROMISE!

SUPPORT NO BUILD.

William Chabugan

William Ebersberger  
5875 Fourth Street  
Detroit, michigan 48202

Mr. Lopez,

MDOT held an informational meeting regarding their new plan to widen the I-94 M-10 interchange. I was unable to attend. Over the years I attended many meetings regarding this proposed project and worked diligently to effect a compromise that would not impact or destroy Fourth Street, the neighborhood I love. Two years ago MDOT unveiled a plan that accomplished just that. Our neighborhood would be left, for the most part, intact.

The reason I didn't attend that March 5th presentation was because that morning I was struck by a car while riding a bicycle. Three crushed vertebra, herniated disk, nerve damage, you get the picture. Released from the hospital I was hurt again when I learned the details of new MDOT plan for our little community. They had renounced their compromise, gone back on their word, if you will. Aware of my involvement, several people on my block have expressed the suspicion that my accident was something other than the result of an inattentive driver.

While I personally don't believe that MDOT, or Parsons/Brinkerhoff was "sending a message" I can understand the paranoia engendered by the coincidence. When people have their neighborhood, homes and way of life threatened, by people, or organizations, or corporations that use deceit, that do not play by the rules, or worse make up the rules to suit themselves as they go along, that intimidate and disregard. It is easy for me to see how the cynicism that relationship creates can generate mistrust.

Be that as it may, three things.

**First I can only support the No Build Proposal.**

Second the environmental impact statement does not address the effect of MTT, a substance banned in the United States but used as a gasoline additive in Canada. One can foresee that more traffic from Canada will mean more MTT coming out their collective tail pipes.

Thirdly, this neighborhood serves as a stopover for several migrating bird species, geese, finches, robins and others. A fact also disregarded by the March 5th Draft Environmental Impact Statement. I think a trip back to the drawing board is in order for both the Environmental Impact Statement and the proposed plans for the interchange.

Thank you for your consideration.

I remain,

  
William Ebersberger

from:  
Dave Roberts  
5029 Commonwealth St.  
Detroit MI 48208

313-895-0644

to:  
Mr. José Lopez  
MDOT  
PO Box 30050  
Lansing MI 48909  
Via fax: 517-373-9255

Dear Mr. Lopez

As a member of the Fourth Street Auxiliary, I am writing to express my concerns regarding the planned I-94 expansion. I believe that the current proposal is unworkable. The fourth street neighborhood is an unique and vibrant community that would be obliterated by the plan presented on March 5, 2001. This would be a tremendous loss for the city of Detroit, and our community, not to mention the personal loss that would be suffered by residents in the area.

I believe that preservation of the Fourth Street neighborhood is imperative. The routing of freeways through the central city of Detroit is, I believe, a major factor contributing to the city's decline. While I realize that improvements must serve the needs looking ahead twenty years, any expansion of freeways should not destroy or harm important viable neighborhoods such as Fourth Street.

At present the "No Build Option" is the only option presented that I can support.

Respectfully,

  
Dave Roberts

# FAX TRANSMISSION

SOAVE ENTERPRISES, L.L.C.

3400 East Lafayette  
Detroit, Michigan 48207  
Phone: (313) 567-7000  
Fax: (313) 567-8934

TO: Jose Lopez

DATE: 5/7/01

FAX NO: (517) 373-9255

PAGES: 3, including this cover sheet

FROM: Susan Johnson

SUBJECT:

COMMENTS:

The information contained in this facsimile is privileged and confidential information intended only for the use of the individual or entity named above. If the reader of this message is not the recipient, or the employee or agent responsible to deliver it to the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication in error, please immediately notify by telephone at the number above and destroy this document or return to us via first class mail. Thank you.

# Seave

May 7, 2001

**SENT VIA FACSIMILE**

Jose A. Lopez, Public Hearings Officer  
Bureau of Transportation Planning  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, Michigan 48909

Re: Russell/Trombly Property

Dear Mr. Lopez:

We received a copy of the I-94 Rehabilitation Project Environmental Impact Statement Volume I. On Build Alternative Sheet 13-4, Match Line Sheet 14, which matches to Match Line Sheet 4, the drawing shows new exits and entrance ramps that bisect property owned by Mr. Anthony Soave bordered by Piquette, Russell and Trombly streets (see attached).

Inasmuch as this property is our only access to the railroad we own immediately southeast of the property, the taking of this property would seriously impact our ability to use the railroad and continue our operations and as a result, would be enormously expensive. As such, we would urge you to reconsider any option that would involve the taking of this property.

If you would like to discuss this matter or desire additional information, please do not hesitate to contact me at (313) 567-7000, extension 263.

Very truly yours,



Susan L. Johnson  
Senior Counsel

SLJ/cad  
Enclosure

**SOAVE ENTERPRISES**  
LLC.

5400 EAST LAFAYETTE DETROIT, MICHIGAN 48207 • 313.567.7000  
SLJ/lopez.ltr.doc



# FAX COVER SHEET

Michigan Works! Service Center  
304 Harriet Street  
Ypsilanti, MI 48197

Phone: (734) 484-6707

Fax: (734) 481-2516

TO: Jose Lopez DATE: 5-10-01

Phone: \_\_\_\_\_

Fax: (517) 373-9255

ATTN: Jose Lopez

Total Pages: 3

FROM:

Name: Scott Thomas

Comments: 1-94 extended comment



I would like to extend my support for mass transit alternatives incorporated into the very labor intensive and extremely high priced 1.3 billion proposal for the I-94 construction project. I support some funding toward road improvements, but don't support a massive reconstruction project, which excludes mass transit as part of the answer to reduce congestion.

As a regular user of alternative transportation, I strongly support government programs that encourage mass transit as an alternative to single occupancy motor vehicle travel. With our metro area highway system failing due to over congestion and grid locked roadways it should be a requirement that we give citizens the opportunity to choose between traffic backups and on time travel service. Due to these inefficiencies there is a desperate need to overhaul the close-minded approach to our transportation system. It is true that Michigan ranks almost dead last in the nation on money spent for public transportation, leaving behind many people unable to afford to find work because of lack of mass transit.

In addition with air pollution, conservation of energy and high gas prices continual problems it is important that the executive and legislative branches work with MDOT and SEMCOG to develop a long-term metropolitan mass transit alternative in Michigan. This will bring people out of gridlock and into on time service. The one option that must be considered isn't a bus but a monorail system. The advantages of this trolley system are that it would be elevated avoiding traffic congestion, have low operating cost due to reduced friction, present the opportunity to travel many millions of miles without accidents and be constructed with usually half the expense of building more highway lanes. The only drawback noted is the monorail is considered unattractive because of the columns and overhead rails. However it appears there are many more advantages to this type of trolley system. Therefore the government must be prudent and measure public support for a real mass transit option before spending our tax money.

If the highway is widened to six lanes it will temporarily relieve congestion until the traffic is forced to merge into four lanes slowing traffic once again. Therefore we need to put this grandiose failure of a scheme at alleviating gridlock into perspective and focus on the real issue of developing a permanent metropolitan mass transit system. A mass transit system if not a patchwork job, but one that stands the test of time, will give the citizens of Michigan and visitors to our state an on time service option compared to closed down highways. Thank you for your interest and I look forward to further discussions on this issue.

Scott Thomas  
1423 Leforge APT 616  
Ypsilanti, MI 48198  
(734) 482-5328  
salexander\_Thomas@hotmail.com

## E-MAILED COMMENTS

**From:** "McCarthy, Robert (R.J.)" <rmccarth@ford.com>  
**To:** "lopezjos@mdot.state.mi.us" <lopezjos@mdot.state.mi.us>  
**Date:** 3/6/01 12:39PM  
**Subject:** I-94 Projects - please get on with massive re-construction

My vote is to get on with the most aggressive re-construction as possible, as soon as possible. If only I should live so long to see it. Currently this freeway is what visitors to our area see, the most disgusting relic in the US.

Bob McCarthy  
Ford Racing - Jaguar F1  
Roush Technologies Bldg.#21  
12700 Reek Road  
Southgate, Michigan 48195  
Phone (734) 374-7331  
Mobile (313) 505-1835  
Fax (734) 374-7329  
rmccarth@ford.com

From: "James Gerardi" <jger1000@home.com>  
To: <lopezjos@mdot.state.mi.us>  
Date: 3/6/01 5:33PM  
Subject: I-94

Mr. Jose Lopez  
Public Hearing Officer  
Bureau of Transportation Planning  
Michigan dEpartment of Transportation

March 6, 2001

Dear Mr. Lopez:

I submit these comments in lieu of appearing at a public meeting on the subject of repairing I-94 in Detroit.

Complete reconstruction is the only alternative that truly makes sense in terms of results as well as the investment of resources and time (the public's as well as MDOT's) that will be necessary.

The Detroit section of I-94 is almost as old as the original Davison Freeway, which was transformed by reconstruction. No less is appropriate for a road that carries so much more traffic than the Davison and also serves as a gateway for visitors entering the city from the airport. It is depressing to re-enter Detroit after a trip to a city like Portland, Oregon or Chicago or Seattle and bump along on pitted, patched, narrow, dirty I-94. And it's extremely embarrassing to realize that this is the first impression visitors get of the city.

Even more important, I-94 is dangerous in places. It is too narrow for all the truck traffic that uses it, and some of the entry ramps are so short that you grip the wheel and pray as you floor the accelerator to enter at a speed that will lessen the chance of a car in the right lane ending up in your trunk.

An additional lane in each direction is needed not only for greater safety and flow, but to accommodate growth in vehicle volumes. I just read that each year 3% to 4% more cars are added to the roads. Repaving alone will not meet these needs.

In summary, we need an I-94 that is safe, fast, modern and esthetically pleasing as a major gateway to the metro Detroit area. M-DOT shut down and reconstructed the Lodge, and did the same for the Davison, with excellent long-term results. As inconvenient as it will be for all of us, total reconstruction is the ONLY answer for the stretch of I-94 now under review.

My only question is why work is still "several years away," as the Detroit New reported. I-94 in Detroit is in such awful shape that I hesitate to use it for fear of damage to my tires and suspension. What a terrible surface! That factor -- plus the potential for even more traffic due to the enlargement of Metro Airport as well as increased truck traffic from the Ambassador Bridge as improvements are made there -- argues for starting on I-94 as soon as possible. I don't think we have the luxury of "several years" to do the job.

Sincerely,

James L. Gerardi  
382 Mt. Vernon Ave.  
Grosse Pointe Farms, MI 48236  
jger1000@home.com

**From:** <kurt.halsey@gm.com>  
**To:** <Lopezjos@mdot.state.mi.us>  
**Date:** 3/7/01 8:42AM  
**Subject:** I-94 Project

I saw an article in Tuesday's edition of the Detroit News and was disturbed by what I read. Specifically, I noticed that they were considering options other than the complete rebuilding of the I-94 expressway (doing nothing or rehabilitating the existing freeway). As a resident of the eastern suburbs of Detroit, I use this section of freeway every day and quite honestly, have driven on dirt roads that are in better shape. Driving at the posted speeds on this highway is often a hazard. I feel that those of us living in the older suburbs/areas of the Detroit Metropolitan area seeing more than their share of tax dollars for highways go to projects that do not directly benefit them (especially in developing areas where the real estate developers put up houses/businesses with little regard for upgrading the supporting infrastructure such as sewers, secondary roads and expressways).

If you really consider it, I-94 should be rebuilt from 8 Mile Road to Detroit Metropolitan Airport and not just from Conner Ave. to I-96 as currently proposed. This section of expressway is perhaps some of the oldest in Michigan's Interstate Highway System (much of it constructed in the 1950s). The current year project to rehabilitate I-94 from 8 Mile Rd. to Conner Avenue is another short term fix, putting off the inevitable task of rebuilding it. Several highways constructed at the same time or after this stretch of I-94 have already been rebuilt. Among those:

- Lodge Fwy (From Wyoming Ave. to I-75) (1987 & 1988)
- I-75 (From I-94 to I-375) (1990)
- I-75 (From I-375 to I-96) (1999)
- I-696 (From US-24 to I-275) (1987)
- I-275 (From I-696 to M-14) (1999)
- M-14 (From US 23 to I-94) (1999)
- US-24 (From 10 Mile to Orchard Lake Rd.) (2000)

Of the above, only the Lodge Freeway and Telegraph Rd. were constructed at or near the same time as the affected section of I-94.

Furthermore, there is already talk of rebuilding I-75 (a stretch of highway that is newer and in better shape than the stretch of I-94 I am addressing) from I-696 to M-59. This project includes widening it to four lanes.

From a visitors standpoint, the complete rebuilding of I-94 is critical since it is one of the first roads that visitors to our area drive on when leaving Metro Airport. With more visitors coming to Detroit in the upcoming years because of the new casinos, the 2006 Super Bowl and other events, it makes it more imperative to leave a good first impression on these visitors in the hope they visit us again. The new terminal and improvements at Metro Airport is a great start. I've read of cases where certain businesses that have scouted the area for relocating have changed their minds after driving on the section of I-94 from the airport.

In 1984 when I-94 was repaved with a coat of asphalt from 8 Mile Rd. to I-96, taxpayers were told that this was a short term fix. In five years a new and

wider expressway would be built. Obviously this hasn't even been close to happening. There have been several short term fixes to the freeway since then however, I think taxpayer money is being wasted because I don't think that these are solving the underlying problem that the freeway needs to be completely replaced. If I could have \$1 for every day that the Dequindre Yard Bridge has been under construction in the past 15 years, I could probably put a large down payment on a new car or purchase another big ticket item. Hopefully, the complete rebuilding of this bridge this year will finally fix that particular problem.

Expanding the highway to four lanes is necessary to allow it to handle traffic volumes that were never imagined by our forefathers when the freeway was originally designed back in the 1940s. Perhaps making the fourth lane in each direction be a car pool lane during hours of heavy commuting would promote carpooling and reduce congestion. This seems to help in southeast Florida. Perhaps add a light rail track in the middle of the highway that runs from downtown to Macomb or Eastland Malls would also help. To minimize the amount of space/land acquisition, I suggest that the service drives only be two lanes wide (rather than the proposed three). Also, I recommend constructing/expanding the new expressway by removing the grass berms on each side and replacing them with concrete walls (much like I-696 between the Lodge and I-75). This will allow another lane to be added without having to necessarily acquire more land. It also will reduce the cost of grass mowing in the summer.

Will this project be an inconvenience to us? Of course it will. With proper planning and the development of good detours designed to handle the increased traffic volumes during construction, the project is feasible.

I hope it doesn't take another five years of meetings to decide that more meetings and studies need to be held. If that is the case, I think that certain sections of I-94 will amount to little more a dirt road.

Thank you for your time. If you need to reach me, please do so at (248) 263-6945.

From: Bill Houghton <bthoughton01@home.com>  
To: "lopezjos@mdot.state.mi.us" <lopezjos@mdot.state.mi.us>, Chuck Stokes  
<wxyz@rust.net>, "commuter@detnews.com" <commuter@detnews.com>  
Date: 3/12/01 12:08PM  
Subject: I-94

Dear Mr. Lopez,

MDOT is once again trying to craft a cement centric "fix" for congestion at a time when Southeast Michigan is demanding and requires more transit options. To achieve MDOT's goal of a cement "fix", MDOT is engaged in a rushed planning process for I-94, and circumventing full citizen participation during the review period by not providing adequate public notice.

Furthermore, MDOT's rush tactics will allow MDOT to avoid the inclusion of SEMCOG's transit plan, which is scheduled for completion in October 2001. SEMCOG's transit plan has the potential to illustrate there isn't a need for additional lanes on I-94. Is this why MDOT is rushing the planning process?

Is this how a taxpayer funded government agencies should operate? I thought MDOT worked for the citizens of Michigan?

Therefore, I ask, as the Detroit Free Press Editorial Board and TRU have, that MDOT delay the citizen review period and to take in to consideration SEMCOG's transit plan for Southeast Michigan before the final design for I-94 is completed.

Please see the attached web site for Transit Riders United letter to MDOT and the Detroit Free Press Editorial's request for the inclusion of SEMCOG's transit plan.

<http://www.marp.org/I94extension.htm>

Free Press: Don't commit just yet to \$1.3-billion widening plan  
[http://www.freep.com/voices/editorials/ewide2\\_20010302.htm](http://www.freep.com/voices/editorials/ewide2_20010302.htm)

Sincerely,  
Bill Houghton  
539 W. Marshall  
Ferndale, Michigan 48220

CC: <james.steele@fhwa.dot.gov>, "kdkhands@voyager.net" <kdkhands@voyager.net>, motranzit <Motranzit@aol.com>, "dbalch1@mediaone.net" <dbalch1@mediaone.net>, "marp@mich.com" <marp@mich.com>, "slkhands@voyager.net" <slkhands@voyager.net>, Dan Keifer <Dckeifer@aol.com>, Sally Lawler <slawler@umich.edu>, citizensforbuses <citizensforbuses@aol.com>, hope4detroit <hope4detroit@hotmail.com>, mdotdirector <mdotdirector@mdot.state.mi.us>, Bill O'Brien <JerPro@aol.com>, Carmine Palombo



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 <gerritt@freepress.com>, Bill O'Brien <JerProj@aol.com>, "commuter@detnews.com"  
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 <cperric@house.state.mi.us>, Dan Dirks <DDirks@ix.netcom.com>, David Sanders  
 <sanders@semcog.org>, dwoodward <dwoodward@house.state.mi.us>, James Cramer  
 <james.cramer@fhwa.dot.gov>, "King, Robert" <rjking@detnews.com>, Lam <lam@freepress.com>,  
 Laura Berman <LauraBe@aol.com>, Lynn Rivers <lynn.rivers@mail.house.gov>, Mari Ellis  
 <mellis@Canton-MI.org>, Pete Waldmeir <PWaldmeir@aol.com>, rgosselin  
 <rgosselin@house.state.mi.us>, "rovphi@ddot.ci.detroit.mi.us" <rovphi@ddot.ci.detroit.mi.us>, senator  
 <senator@levin.senate.gov>, "Silverman, Mark (Detroit)" <msilverman@Detmain1.DNPS.com>, slevin  
 <slevin@mail.house.gov>, "transcomm@mail.house.gov" <transcomm@mail.house.gov>, WilsonA  
 <WilsonA@mayor.ci.detroit.mi.us>, WXYZ TV Detroit <talkback@wxyztv.com>, Bonior  
 <david.bonior@mail.house.gov>, Bomar <bomars@ddot.ci.detroit.mi.us>, amy klein  
 <klein@freepress.com>, Mayor Dennis Archer <Mayor@mayor.ci.detroit.mi.us>, mcgruder  
 <mcgruder@freepress.com>

**From:** "Gerald A. Krueger" <gerald@krueger.com>  
**To:** <lopezjos@mdot.state.mi.us>  
**Date:** 3/12/01 10:14PM  
**Subject:** I-94 Rebuilding

Please consider these comments in favor of Complete Rebuilding of I-94 between I-96 and Conner Ave.

I live in Grosse Pointe area and have my business office located on the I-94 service drive (Harper Ave.) in Harper Woods, between the Allard exit and Vernier. We are located near the freeway to be able to hire people from all over the metro area without costing much of their personal time on service streets. Also, being near the freeway helps in saving driving time in and out of our offices.

We use the I-94 freeway daily, and would like to support the alternate of the full reconstruction of the roads, including adding at least one additional lane in each direction. We understand the longer construction time and additional inconvenience that a project of this magnitude will take, but we believe that additional lanes going through the I-75 interchange and up to the I-96 interchange will extend the usefulness of the capital commitment to this project for many additional years.

Please feel free to contact me if you have any questions.

Gerald A. Krueger, President  
American Community Developers, Inc.  
20020 Harper Ave.  
Harper Woods, MI 48225

**From:** "Aleta Runey" <ARuney@cadtrw.ci.detroit.mi.us>  
**To:** <lopezjos@mdot.state.mi.us>  
**Date:** 3/13/01 3:18PM  
**Subject:** As a private citizen and Detroit resident I am interested in knowing if in the planning of the I-94

As a private citizen and Detroit resident I am interested in knowing if in the planning of the I-94 project in Detroit discussion around the advantages of building efficient, mass transit vs environmentally archaic single-driver auto? WHY aren't we able to access affordable, fast, geographically diverse, transportation? Leaving the driving to us via bus is so slow an oxen could have made better time since my last trip from Upper MI to Detroit (around 17 hours!!)  
Please, avoid any more highway increases until mass transportation is available to the masses.

**CC:** "Kathy Mitten" <KMitten@pdd.ci.detroit.mi.us>

From: stephenweatherhoit@hotmail.com  
To: <lopezjos@mdot.state.mi.us>, <mayor@mayor.ci.detroit.us>,  
<senator@levin.senate.gov>, <senator@stabenow.senate.gov>  
Date: 3/16/01 12:11PM  
Subject: I-94 expansion

I am concerned about what I have heard about an I-94 expansion project. I will be the first to agree that the stretch of express in question does need to be repaved. As for expansion, the city and Metro Detroit would be killing itself if it continues to put money into such short sited measures. We have to compete with cities from around the world. From my travels I see three concerns for each metro area: education, transit, and attractions. We have an excellent and progressive educational system in this area including the highly respected University of Michigan. We have a wealth of attractions, landmarks, and other sites on which to build. Our greatest weakness - mass transit. We should be very proud of the efforts of Wayne County to develop what will be one of the world's great airports. Now we should be concerned about a mass transit system to move people around the area like in other metro areas. If we don't, we might as well turn out the lights. The competition is only growing. We don't need wider roads. We need people to get off the roads. I am taking a summer vacation this year to Quebec. I have enjoyed the region for years. They have an excellent transit system.

Stephen Arthur Weatherhoit

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**From:** Sharon Vlahovich <s\_vlahovich@yahoo.com>  
**To:** <lopezjos@mdot.state.mi.us>  
**Date:** 3/16/01 9:13PM  
**Subject:** Opposition

Hello,

I am writing to express my opposition to the planned expansion of Interstate 94 between Conner and Interstate 96. This project brings up important questions about the kind of environment citizens of the State of Michigan would like to live in. One billion dollars is a large amount of money. Is it being spent on solutions to our most pressing transportation problems? I don't think that this project does. I respectfully suggest that investment in mass transportation would be a better (more cost efficient and more environmentally friendly) solution to the problem of traffic congestion.

This planned expansion will increase automobile traffic, noise and air pollution and eventually lead to the apparent need for even wider roads. But the simple truth is that we can't build our way out of gridlock. [Have you visited Atlanta recently? I have!] We must try a DIFFERENT approach to traffic problems! Please do not spend my hard earned money on this project.

Thank you for the opportunity to share my opinion.  
Sharon M. Vlahovich  
17323 Warrington Dr.  
Detroit, MI 48221

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Do You Yahoo?

Get email at your own domain with Yahoo! Mail.  
<http://personal.mail.yahoo.com/>

From: <McGuirePT@aol.com>  
To: <lopezjos@mdot.state.mi.us>  
Date: 3/16/01 10:56PM  
Subject: I-94

Fix I-94 first and add capacity through transit and rail improvements!  
Otherwise, Detroit will be a sacrifice zone for trucks as they race, noisily  
through our city, not stopping to generate economic vitality here.

Tom McGuire  
17322 Warrington  
Detroit, MI 48221  
A registered voting citizen.

**From:** "Fern Katz" <jskatz@mich.com>  
**To:** <lopezjos@mdot.state.mi.us>  
**Date:** 3/17/01 4:19PM  
**Subject:** transportation

We need public transportation desperately in the Detroit area. There is no way you can justify the expenditure to widen I-94m unless you can find matching funds so that Detroiters can go to work. The truck traffic passing through Detroit just adds to the air pollution.

Fern Katz  
27065 Fairfax  
Southfield, Mi 48076

From: <Ckate39@aol.com>  
To: <lopezjos@mdot.state.mi.us>  
Date: 3/18/01 9:03AM  
Subject: I-94 rehab

Dear Sir,

I would like to voice my concern over the upcoming proposed rehabilitation of the seven-mile stretch of I-94. This area obviously needs some work, but the 1.3 billion dollar proposal is not in the best interests of the community.

A more modest proposal could solve the problems there yet still leave money for more commuter mass transit.

Please consider modifying the proposal to something more practical and useful in the long run.

Sincerely,

Catherine Krenek  
Dearborn  
Ckate39@aol.com



From: "Jim Demello" <Jim\_Demello@polk.com>  
To: <lopezjos@mdot.state.mi.us>  
Date: 3/19/01 8:24AM  
Subject: Protext I94 expansion...

I protest the expansion of I94. Put the money in public transit - like the Metro in DC. Also, do something about the 55 mile per hour speedlimit on Southfield Freeway - people are doing over 80 in some parts. Either enforce the limit or raise it to something reasonable.  
Thanks. Jim Demello 4146 Campbell, Dearborn Heights, MI 48125

\*\*\*\*\*  
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\*\*\*\*\*

From: "James Edwards" <Edwaj@law.ci.detroit.mi.us>  
To: <lopezjos@mdot.state.mi.us>  
Date: 3/19/01 9:59AM  
Subject: Expansion of I-94

3/19/01

Dear Mr. Lopez,

Below is an article by Karen Kendrick-Hands which was published in today's Free Press. Somewhat in despair I have to ask you (or through you the MDOT) haven't you done enough already to destroy the City of Detroit? As a lifelong Detroiters in my mid-fifties I can't help but recoil in horror from the damage which has been done to my beloved City by uncontrolled expressway mania. In my view there is no justification whatever for I-94 to occupy any greater urban space than it does now.

It's my understanding that, among other things it is planned that this project will eat up the Fourth Street neighborhood north of the Wayne University area. Heaven knows what other bits of City landscape you plan to throw into this dumpster. I beg you to stop before you have literally paved over the City.

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Article By Karen Kendrick-Hands published 3/19/01 in the Detroit Free Press p11A.

Anyone who drives I-94 through Detroit knows that the Michigan Department of Transportation needs to do something about the potholes and broken-up pavement. It's congested, too.

So when MDOT let the word out that I-94 will be "rehabilitated," most drivers responded, "Great! It's about time."

Fellow taxpayers, be careful what you wish for.

Behind the deceptive phrase "rehabilitation" is a plan for 20-plus lanes of pavement put down at a cost that works out to nearly \$20 billion per city block. As revealed in the Draft Environmental Impact Statement, the stretch of pavement between Conner Avenue and I-96 will cut a concrete swath through the heart of Detroit wider than a football field is long, at a cost of \$1.3 billion.

(At 10 blocks to the mile for 6.7 miles, that's nearly \$20 million a block. And the maintenance commitment this requires will compete against future transit investments for decades.)

When completed, I-94's footprint will cover:

Eight through-traffic lanes.

Two acceleration/deceleration lanes.

Six lanes of service drives.

Four 12-foot-wide shoulders for breakdowns and accidents.

Four lanes of space in the center (54.5 feet, reserved for a future mass transit project, according to the environmental impact statement).

Sidewalks for foot traffic.

Yes, I-94 is congested. But remember, that's mostly because the past five years have been spent rebuilding bridges over Woodward and the Dequindre rail yard just east of I-75. We have forgotten that I-94's "normal capacity" is really three lanes like other urban freeways.

An interstate of the scale proposed -- equal to 24 lanes with the reserved space included -- is not normal for urban areas. Real cities around the country, such as Chicago, Denver and even car-crazed Los Angeles, limit their urban freeways to three lanes in either direction. Capacity needs are managed with mass transit and rail alternatives for people and freight.

To waste this much money on a bloated, over-built road project and not put a dime toward mass transit, when one-third of the households in the city lack access to an automobile, is shameful.

The Southeast Michigan Council of Governments will be the first to tell you that there is not enough money to meet the transportation needs of this region. Michigan's gas fund can't pay for this monstrosity. So to jump-start this boondoggle, Gov. John Engler plans to spend \$66 million from Build Michigan III, a bond program that raids the state's "rainy day" fund and mortgages your kids' future. Detroit will be asked to ante up \$8.25 million just for preliminary engineering as its share for this nightmare. That money would buy a lot of buses.

Do we need all that capacity? No. This extra capacity isn't for the mix of traffic we're used to now. This space is for trucks, and lots of them.

MDOT's project justification for Build Michigan III says: "A major objective is to maintain truck mobility as this segment is part of the hub of interstate-to-interstate and international truck travel. This section of I-94 provides a connection for commercial and transcontinental traffic to two Detroit/Windsor border crossings. These border crossings support more international trade than exists between Mexico and Texas and Mexico and California combined."

I-94 will become a vast, 20-lane wasteland of truck-choked concrete. Detroit will be a sacrifice zone for trucks as they race through our city, not stopping to generate economic vitality here. The environmental impact statement doesn't even address the increased toxic burden on air quality from the trucks or the excess asthma attacks, cancers and premature deaths they will cause.

The four future center lanes are the wolf of truck lanes in the sheep's clothing of public transit. MDOT talks about how the I-94 project will be great for mass transit because of the space saved in the center. Don't be deceived. Saving space for transit is a ruse to create room for truck lanes. And offering sidewalks next to pollution generators in the name of environmental justice is a real slap in the face.

We don't need to displace people in order to save space for a transit system "maybe in the future." We need generous investments in transit systems today. We need to shelve this I-94 project until public

transit is as an integral part of the corridor's planning and budget.

To protest the I-94 project, write to Jose Lopez, MDOT Public Hearing Office, P.O. Box 30050, Lansing, MI 48909 or via e-mail at [lopezjos@mdot.state.mi.us](mailto:lopezjos@mdot.state.mi.us), or fax him at 517-373-9255.

KAREN KENDRICK-HANDS of Grosse Pointe Park is cofounder of Transportation Riders United. Write to her via e-mail at [kdkhands@voyager.net](mailto:kdkhands@voyager.net).

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CC: "Patrick Murray" <[MURRPJ@law.ci.detroit.mi.us](mailto:MURRPJ@law.ci.detroit.mi.us)>, "Karl Newman" <[NewmK@law.ci.detroit.mi.us](mailto:NewmK@law.ci.detroit.mi.us)>, <[kdkhands@voyager.net](mailto:kdkhands@voyager.net)>

From: Jukeboys <jukeboys@mediaone.net>  
To: <lopezjos@mdot.state.mi.us>  
Date: 3/19/01 10:45AM  
Subject: MDOT proposal for I-94

To: Jose A Lopez  
Public Hearings Officer  
Michigan Department of Transportation

Dear Mr. Lopez,

If the Detroit Metro area does not begin to put all possible resources toward public transit immediately then the city will never come back to life. This should be the number one priority - it will solve so many problems. A 20 lane, seven mile strip of I-94 will squander precious funds and, once again, place further hardships on the minorities that reside in the surrounding area.

It is mindboggling that someone actually put this proposal down on paper. And it saddens me to see the city continue to resist taking the most logical, positive step of implementing public transit. Have you tried to take a bus lately in the metro area? Those who must take them to their jobs or other timely appointments usually must spend hours just to go a few miles, often standing out in the elements because there are so few shelters. This is especially true if you try to transfer between communities.

We are choking on fumes, potholes, car repairs and insurance costs. Please do what you can to stop this insane proposal and give us what we really need.

Thank you,  
Kathy McGettigan  
6915 Bingham  
Dearborn  
(313)584-4777  
jukeboys@mediaone.net

CC: <mayor@mayor.ci.detroit.mi.us>, <senator@levin.senate.govSen>,  
<senator@stabenow.senate.gov>

**From:** "Larry Lockhart" <mllock@ejourney.com>  
**To:** <lopezjos@mdot.state.mi.us>  
**Date:** 3/19/01 12:28PM  
**Subject:** I-94 Rehabilitation

An op-ed column in the Detroit Free Press of March 19 describes a proposed re-do of I-94 in Detroit. The proposal, as described, seems to make no sense from any standpoint I can see. The road needs to be repaired, YES. But widened to 20 lanes? No way. The project will cover just 6.7 miles according to the column. This means there will be major choke points at either end of this section unless you make it 20 lanes from Port Huron to Chicago.

A massive section of road like this will need constant repair based on Michigan's current road building standards. The state can't keep up with repairs now. Building this albatross will only worsen the situation. And it is totally unnecessary.

Larry Lockhart  
PO Box 232  
West Branch, MI  
48661

**From:** "James A. Grant" <visionary1@cyberservices.com>  
**To:** <lopezjos@mdot.state.mi.us>  
**Date:** 3/19/01 1:59PM  
**Subject:** I-94

Greetings,

Short and sweet,

We need mass transit, not wider freeways.

Before we widen freeways I would advocate studying the idea of instituting lane speed limits. Making left lanes a sort of "express lane" for drivers traveling a longer stretch of a particular freeway. I think this would be a much more effective choice than a car-pool lane.

The ultimate answer, though, would be to spend this \$1.3 billion on mass transit, something Michigan desperately needs.

--

James A. Grant  
visionary1@cyberservices.com

ICQ: 3404665  
WWW Pager: <http://www.icq.com/3404665>

"Courage is... the mastery of fear"  
"Ultimately, on the other side of  
every Fear lies a Freedom."  
"The secret to happiness is Freedom.  
The secret to Freedom is Courage."

**From:** "Dan Broner" <drbroner@mediaone.net>  
**To:** <lopezjos@mdot.state.mi.us>  
**Date:** 3/19/01 7:41PM  
**Subject:** I-94 project

As a metro-Detroit resident I wish to state my objection to the I-94 widening project. Metro Detroit is in urgent need of mass transit. Many Detroiters don't even own cars. Anyone who has lived in major cities with adequate mass transit is painfully aware of Detroit's failings in that regard. The proposed widening of I-94 is shortsighted at best. Many of my acquaintances agree.

Regards,  
Dan R. Broner



**From:** <McDski@aol.com>  
**To:** <lopezjos@mdot.state.mi.us>  
**Date:** 3/19/01 7:54PM  
**Subject:** I-94 project

Dear Mr. Lopez,

I hope you will register my opposition to the governor's proposed I-94 project. I agree with Karen Kendrick-Hands, writing in the Detroit Free Press today, that the project proposal is fundamentally dishonest. While I agree that we need to work on our infrastructure, this sort of wolf in sheep's clothing trickle-down giveaway is not the way to do it – and I will do everything in my power to keep it from going forward.

Thank you for your kind attention to this matter.

Michael Dallen  
Attorney at Law  
Detroit

P.S. I should appreciate it if you or MDOT could keep me apprised of any further developments or future public hearings relating to this issue.

From: "Reuben A. Flatt" <flatts@ameritech.net>  
To: <lopezjos@mdot.state.mi.us>  
Date: 3/19/01 8:17PM  
Subject: I94 update

Mr. Lopez -

Please reconsider the massive update of I94. I have commuted in the metro Detroit area for the past 20 years. The area does NOT need more freeway lanes. For Detroit to become a major metropolitan area, it has to have real public transportation.

I have worked in Chicago and Cleveland. In both of these cities, a critical mass of employees can be delivered to downtown and retrieved on a daily basis. Detroit can't do that. It's shrinking population indicates that dramatically.

Please reconsider.

Reuben Flatt  
763 Lake George  
Oxford MI 48370

PS. Yes, I DO consider myself a metro-Detroiter!

**From:** Joyce Halstead <jlhalste@tm.net>  
**To:** <lopezjos@mdot.state.mi.us>  
**Date:** 3/20/01 9:10AM  
**Subject:** I-94 project

Mr. Lopez, as a citizen of Michigan and a taxpayer, I'm appalled at the plan to widen I-94 to 20 lanes. The vast sums of money this requires can be better spent on mass transit and accommodations for nonmotorized traffic.

Joyce Halstead  
521 N. Clyde Road  
Midland, MI 48640  
Region 7 Director  
League of Michigan Bicyclists  
(517)835-9685

**From:** Anca Vlasopolos <ab1165@wayne.edu>  
**To:** <lopezjos@mdot.state.mi.us>  
**Date:** 3/20/01 11:35AM  
**Subject:** I-94 "Renovation"

Dear Mr. Lopez:

I travel on I-94 from Grosse Pointe, where I live, to Wayne State University, where I teach, almost daily. I see the extraordinary deterioration of the pavement that makes me fear for my life and the longevity of my car.

However, I think the plans to widen I-94 instead of repairing it and keeping it in good conditions are disastrous, and I oppose them. We need to invest more money in rapid transit. Every successful city in the world has rapid transit that's dependable, relatively inexpensive, and relatively safe. Only cities on a suicide mission pave their available land to make it easier for people to pass through them without stopping instead of seeing them and occasionally pausing to appreciate metropolitan life.

In addition, the environmental impact of the present plans to widen I-94 will be borne, once again, by lower-middle-class and poor people, the closest to the freeway. And the rest of us will be indirectly negatively affected as well by the increased traffic, noise, and concomitant pollution.

Please explore ways to make the city more livable, not easier to pass through.

Sincerely,  
Anca Vlasopolos  
820 Notre Dame  
Grosse Pointe, MI 48230

From: <DETBABE2@aol.com>  
To: <lopezjos@mdot.state.mi.us>  
Date: 3/20/01 12:01PM  
Subject: Proposed renovation of I-94

Date: Tue, 20 Mar 2001  
To: lopezjos@mdot.state.mi.us  
From: Claire O'Leary <detbabe2@aol.com>  
Subject: I-94 "Renovation"

Dear Mr. Lopez:

I have lived in the Metro-Detroit area for more than thirty years. Until recently 20 of those years were spent living on the far eastside of Detroit where use of the I-94 freeway was nearly a daily event. Most metro-Detroiters are quite aware of the extraordinary deterioration of all our area freeway pavement that makes us fear for our lives and the longevity of our cars.

However, I think the plans to widen I-94 instead of repairing it and keeping it in good conditions are disastrous, and I oppose them. We need to invest more money in rapid transit. Every successful city in the world has rapid transit that's dependable, relatively inexpensive, and relatively safe. Only cities on a suicide mission pave their available land to make it easier for people to pass through them without stopping instead of seeing them and occasionally pausing to appreciate metropolitan life.

In addition, the environmental impact of the present plans to widen I-94 will be borne, once again, by lower-middle-class and poor people, the closest to the freeway. And the rest of us will be indirectly negatively affected as well by the increased traffic, noise, and inevitable pollution.

Please explore ways to make the city more livable, not easier to pass through.

Sincerely,  
Claire O'Leary  
2701 Douglas Drive  
Bloomfield Twp., MI 48304

From: Lynn Pennacchini <lynnlynn2000@yahoo.com>  
To: <lopezjos@mdot.state.mi.us>  
Date: 3/20/01 4:43PM  
Subject: concerned citizen and driver

Dear Michigan Department of Transportation,

I am against the proposal for widening I-94. To spend so much money on widening a highway so much on a 7 mile stretch does not make sense to the people who live in these areas nor to the people on the highways.

I-94 has had a lane closed and needs upkeep and repair - these actions will help drivers better get where they are going. Putting more lanes in will just encourage additional lanes down the road, and encourages more one-person traffic and trucks to run through. With this traffic comes pollution which kills us slowly, and accidents which kills us quickly. Why would people want to further expand something that kills people?

That money instead should be used to make clean and efficient public transportation options for the people in Detroit and surrounding communities, and creatively address problems that come from highway traffic. Many people don't own cars in Detroit and are in poverty. Things such as an unreliable bus system keeps them disabled and in poverty and is completely unfair. The Michigan Transportation Department has an obligation to advance transportation methods in ways that does not kill people with air pollution and accident rates, and speaks to the needs of the tax payers - all taxpayers and especially those who are in need of public support. I would like to call on the city to get modern non-polluting buses, explore ways in which to make them run more efficiently, upkeep our existing highways so they can be used to full capacity, and explore options of how to cut down traffic. People in Detroit are not interested in bearing the brunt of trucks speeding through and degrading our city. Thank you for your time.

Lynn Pennacchini  
Registered voter in the City of Detroit

---

Do You Yahoo!?

Get email at your own domain with Yahoo! Mail.  
<http://personal.mail.yahoo.com/>

CC: <mayor@mayor.ci.detroit.mi.us>, <senator@levin.senate.gov>,  
<senator@stabenow.senate.gov>

**From:** "Mary MiRAGE" <mary.lafrance@mindspring.com>  
**To:** "MDOT" <lopezjos@mdot.state.mi.us>  
**Date:** 3/20/01 7:43PM  
**Subject:** I-94 PROJECT

Anytime I hear Gov John Engler, I think about all the trash and toxic waste coming into Michigan. Now he wants to widen I-94, I would guess to allow more truck traffic from Canada--am I right?

Gov. John Engler plans to spend \$66 million from Build Michigan III, a bond program that raids the state's "rainy day" fund and mortgages your kids' future. Detroit will be asked to ante up \$8.25 million just for preliminary engineering as its share for this nightmare. That money would buy a lot of buses.

The proposed budget of 1.3 billion dollars for the 6.7 mile project is enough to build a region-wide network of commuter rail and bus rapid transit and build light rail transit on Woodward Avenue.

We need more busses, not more trash, not more potholes from heavy truck traffic.

Jose Lopez

Public Hearings Officer

Michigan Transportation Department

P. O. Box 30050

Lansing, MI 48909

re: Comments on I-94 Draft EIS

Dear Mr. Lopez:

Our Association is opposed to the acceptance of the Draft Environmental Impact Statement on the I-94 expansion for numerous reasons, which I will summarize below. Only by using the most contorted logic does the purpose of this project make sense. M-DOT knows full well that the area of I-94 needing work goes well beyond the bounds of the project area, but M-DOT only considered a transit alternative within the boundaries of the project area. I was a participant in the 1997 SEMCOG Regional Rail Study, and know that the study found that a commuter rail system could be effective in handling traffic growth along the Mt. Clemens-Ann Arbor corridor. We found that an effective commuter rail system could be built for about one tenth the cost of this project. The only other justification given for this project is the increase in truck traffic generated by NAFTA. The DEIS makes no mention of the cost involved in upgrading parallel rail lines to handle this traffic. It is our contention that this increased freight traffic could be better handled by rail at a fraction of the cost of this project. Yet this lower cost alternative was never considered by M-DOT.

This is a classic example of a project in search of a need. \$1.3 billion or roughly \$20 million per block is far too much to spend when lower priced and more effective alternatives are available. In fact, if the No-build Alternative were to be used, and assuming only a five year effective life for the resurfacing, the freeway could be resurfaced for over 400 years for the cost of the Build Alternative.



We are also concerned about the lack of transit to meet the enormous traffic dislocation caused by the project, which even if done on-time will take over seven years. Re-routing traffic onto surface streets simply will not work. I live just off Harper Avenue between Eight and Nine Mile Roads. When I-94 is closed in that area, it is nearly impossible to get onto or off of Harper. A similar problem will develop in every area along the freeway, and we can be assured of traffic chaos for five to seven years. M-DOT's assurances that all will be well simply are not acceptable. If this project is to go forward, a transit alternative is required.

The exceptionally short time allowed for review and comment of the DEIS has not allowed us sufficient time to research apparent problems further. We believe that the draft EIS should be rejected, and that a new comment and hearing period should be established, and with at least 60 days time to research and prepare commentary. Virtually all of the groups opposing this project are volunteer citizen groups, who must research and prepare comments on their own time after putting in a full day's work. M-DOT's handling of the DEIS hearings and comment period are a slap in the face to citizen involvement in our government.

Sincerely yours,

John DeLora

Executive Director,

Michigan Association of Railroad Passengers

**From:** "Julie Kohn" <fsuitcase@bignet.net>  
**To:** <lopezjos@mdot.state.mi.us>  
**Date:** 3/20/01 9:15PM  
**Subject:** enlarging I94

Mr. Lopez:

The new paving of I 94 to 20 lanes is just crazy. No one in Detroit needs and increase in the road size to that extent plus the exhaust fumes would be enough to kill everyone.

If you have so much money, why not put it where it is needed most--mass transit.

A new idea for Detroit which is long overdue! Detroit is fast approaching a city that has more to offer than just the car capital of the world. I don't believe that Detroit has the right to call itself that anymore.

Detroit is finally expanding its horizons into computer technology and even gaming.

Let's get with the mass transit picture and bring Detroit up to the 21st Century.

Sincerely,

Julieanne Kohn, CTC

**From:** "Gerald Heuer" <g.r.heuer@worldnet.att.net>  
**To:** <lopezjos@mdot.state.mi.us>  
**Date:** 3/20/01 11:25PM  
**Subject:** I-94 Modernization

Mr. José A. López 20 March 2001  
Public Hearings Officer  
Michigan Department of Transportation

RE: I-94 Modernization

Dear Mr. López:

MDOT's plan says nothing to rail transport. Rebuilding I-94 offers a great opportunity to put in an east-west rail line that could go Metro Airport and Ann Arbor on the west and to the development areas in the area of Selfridge ANG Base on the east. Such a line could join other rail lines that would go to Pontiac along the old Grand Trunk line and also join a line that would have a terminus in downtown Detroit and follow the old Chesapeake line to Lansing.

Let's not spend all the money on pavement without thinking outside the box to promote rail transport as well. Unless we offer alternative to cars, the traffic congestion problem will continue.

I have lived all over the world and I am saddened to see that Detroit has no metropolitan transportation system. Even Washington DC with all its politics has a superb metro system. You can easily get around London, Paris, NYC, Boston, San Francisco, Stuttgart, Frankfurt, Berlin (east and west when Berlin was divided), and Tokyo because of their systems, so why not here. Please just repave I-94 for now and go back to the drawing board. Our businesses in the suburbs are crying for an efficient transportation system that will get workers to and from Detroit. Please listen to them.

Sincerely,

Gerald R. J. Heuer  
5291 Lannoo  
Detroit MI 48236-2137

**From:** "John T. Feret" <mellomon@msn.com>  
**To:** "Jose Lopez" <lopezjos@mdot.state.mi.us>  
**Date:** 3/21/01 1:38AM  
**Subject:** I-94 Reconstruction

Mr. Lopez,

improvements to I-94 are necessary, just as most roads in Detroit are in need of serious repair. Is it really in the best interest of the citizens of Michigan taxpayers to spend \$1.3 billion to make some improvements to one piece of road?

Many roads in Detroit are in pitiful condition. Patching potholes year-after year-after year has proved to be an ineffective solution. The blame is placed on the use of salt in the winter to melt snow. If this is the case, why is it that other northern cities do not have nearly the problem Detroit experiences with poor road conditions? The answer is that Detroit's roads are overburdened because of a complete lack of mass transportation.

A light rail system thought Detroit would ease the burden on roads, lowering maintenance costs significantly. Air quality would improve, as would the overall quality of life.

Throwing money at a problem such as I-94 does not solve the problem. If the current plan is implemented it will eventually cause more problems than there currently are with the area's roads. And will this mega-expansion come in at the budgeted amount?

Many road projects in Michigan seem to way over compensate. In Oscoda, there is currently a project to expand a two lane road to four lanes, when there is not any traffic congestion to warrant spending tax dollars to pave over people's lawns.

If we keep paving over this beautiful state and not looking to correct the serious transportation problems that exist, we will just keep throwing money away on projects that in reality do not help to ease the existing problems.

As long as there is a lack of real mass transportation in Detroit, there will be bad roads in Michigan. \$1.3 billion spent on the development of a light rail system for Detroit would go a long way toward solving problems such as the current congestion on I-94. Or a \$1.3 billion band-aid can be applied.

That only leaves the question: How much more will it cost to widen every freeway in Detroit to 10 or 12 lanes?

**From:** chris mcneight <cmcneight@yahoo.com>  
**To:** <lopezjos@mdot.state.mi.us>  
**Date:** 3/21/01 7:15AM  
**Subject:** Public Mass Transit

To Whom It May Concern,

In response to an email I recently received, I would like to offer my support for the concept of improving, rather establishing, an efficient and safe system of mass transit in the Detroit metropolitan area.

I am uninformd as to the details of the current proposals underway, and unfortunately am unable to attend tonight's meeting. However, there exists interest in learning more and possibly becoming a volunteer in promoting the above mentioned idea.

Thank you and best of luck.

Sincerely,  
Chris McNeight

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<http://personal.mail.yahoo.com/>

**From:** MELVIN ROWE <melrowe@home.com>  
**To:** <lopezjos@mdot.state.mi.us>  
**Date:** 3/21/01 9:36AM  
**Subject:** I-94 Project

I do not agree with the subject project. In fact I do not agree that we should build any more new freeway systems at all until we learn how to build a roadway that will last more than 7 years. I don't know the causes for our roadways deteriorating so rapidly, but it is a disgrace. Whether it is a problem of design, or construction quality, or overloaded trucks, or a combination of both, I think we should commit ourselves to finding the cause(s) and resolving them. Even if the initial installation of a reliable roadway costs more, it will be much more cost effective in the long run. Do we have any plans to do so?  
Thanks. Mel Rowe

**From:** "mtgsites" <mtgsites@gtii.com>  
**To:** <lopezjos@mdot.state.mi.us>  
**Date:** 3/21/01 4:30PM  
**Subject:** public comment I-94 Detroit project

Dear Mr. Lopez,

I'd like to protest the current plans for the Detroit Edsel Ford Freeway I-94 project. There seems no need, to me, for it to be such a large, wide project. It seems overkill, to say the least. I lived in the City of Detroit for 17 years, and still visit frequently, and the need simply does not exist for such a huge, expensive re-do.

Thank you,  
Tom Albrecht  
3546 Woodland Trail  
Williamsburg, MI 49690

**From:** "Robert Duda" <Robert.Red.Pine@worldnet.att.net>  
**To:** <lopezjos@mdot.state.mi.us>  
**Date:** 3/21/01 5:56PM  
**Subject:** I-94 Expansion

Dear Mr. Lopez:

I am against the proposed expansion of I-94 in Detroit.

This proposal is a waste of money and does not really address the basic transportation need of southeast Michigan. That need is a mass transit system - that works. While the proposal gives lip service to mass transit lanes, no one really believes that MDOT is serious about it.

This proposal will also ruin existing neighborhoods.

Sincerely,

Robert J. Duda  
39202 Donald  
Livonia, MI 48154  
734.737.4166



**From:** judy borchardt <jborcht@yahoo.com>  
**To:** <lopezjos@mdot.state.mi.us>  
**Date:** 3/22/01 12:28PM  
**Subject:** I-94

I'm writing to protest the I-94 project which has as its objective to provide a connection for commercial and transcontinental traffic. It will further divide up the city and pollute the air and our ears. We need to design transportation for Detroit which includes consideration for people moving around - mass transit should have a greater priority over trucks. Yes, you may argue that trucking, etc., provides jobs. Hurting the city for commercial reasons has been done enough.

---

Do You Yahoo!?

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<http://personal.mail.yahoo.com/>

Dear Mr. Lopez, Yes, I-94 does need to be repaired, but i beleive the proposed project is the wrong way of doing it. it seems every development decision detroit makes is backwards, and forgets about the role of government, to represent the people of the city and to make decisions that would benefit the people of detroit most. the "improvements" detroit is making seem to cater to the suburbs, trying to find different ways to bring the people living there to detroit to spend money. Which is not a bad idea, unless you forget about the detroiters. a number of detroiters dont have cars, so the large amount of money proposed to be spent on the repairs wont make their day to day run any smoother unless indirectly through the busses that use 94. But if you really wanted to help those people without cars you would take the money proposed for the 94 project and spend it on a state of the art public transportation system. Maybe superconducting trains, a rail system that would connect you to all the surrounding suburbs, ann arbor, grosse pointe, royal oak, ferndale, pontiac, auburn hills. that rail system would also connect you to the airport and amtrak stations that could take you all over the world. Also this transit system should have clean , safe, easily identifiable stations, with maps, instructions for using, and costs extremely accessible. The stations should be enclosed and heated in the winter. The cost for using the transit should be affordable so poor people will be able to use it, and hopefully if it was built well enough, enough people would use it that it could pay for its own maintenance. This sort of mass trans would cut down on drunk driving, would be environmentally good for detroit in so many ways, would make the city more accessible to tourists, and would give detroit some class, in the sense that our state and city government had enough forethought and enough concern for the underpriveleged people of the city, enough understanding of the word governance and stewardship to serve its people in a efficient thorough way that would probably benefit the city in chain reaction action, with one good idea carried out well, bringing forth more good ideas. That was a run on sentence. sorry. anyway thats my 2 cents. I dont really know who you are, but i beleieve its your time to shine. Forget the difficult bureaucracy im assuming goes with what you do for a moment and remember ideals and all the people who will never ever be able to afford SUV's, also think about depleting natural gas and the environmental degredation that comes from burning gas and mining. If you need help you can hire me for at least 12 dollars an hour and an insurance plan. sincerely, Leah Retherford

**From:** <lapoin18@msu.edu>  
**To:** <lopezjos@mdot.state.mi.us>  
**Date:** 3/22/01 11:23PM  
**Subject:** Public Transit!

Hello!

I am just writing this e-mail to you because I would like to positively influence you to improve public transit in large cities in Michigan. Especially places such as, the metro Detroit area where you have to wait one hour for a bus. I myself would love to use mass transportation for a number of reasons. First of all, it supports a good environmental cause instead of millions of metro Detroiters "individually" driving their cars all over! Secondly, you don't have to worry about spending too much money on gas! I am just informing you that an excellent idea would be to support the habilitation of public transit. Thank you very much!  
Cecelia LaPointe

From: Jacob Stevens <jacob@ic.org>  
To: <lopezjos@mdot.state.mi.us>, <I94Detroit@pbworld.com>  
Date: 3/24/01 7:55AM  
Subject: I94 Rehab Comments

Hello Rehab Folks!

I would like to first off thank you so much for soliciting lots of public involvement and input into the I94 rehabilitation project. Getting input from the public of Detroit is the only ethical approach to this sort of major project and I applaud your thoughtful and helpful efforts to do so. Thank you.

I attended the evening information session at the African American History Museum and was able look over most of the information and talk with several MDOT employees at length. I strongly encourage the No-Build Alternative for now.

The main purpose for this recommendation is the striking and severe need for better transit systems in Detroit. Congestion, safety and pollution are not demands that we must meekly accept and answer to by providing better roadway service. Without better transit options, this only furthers dependence on cars, which leads right back to greater congestions, safety problems and pollution. We must implement other options. Pollution and safety concerns are only worsened further when the poor of Detroit, who are so thoroughly under-served by our transit options, must buy poor performing vehicles to successfully travel in the city.

Furthermore, please consider the likely future of transportation in our region. While, I understand these things are hard to predict, certain trends seem clear. For one, global warming has been confirmed as a problem by the UN, the European Union, US scientists and numerous other sources. While US Federal policy still stalls on this issue, it is inevitable that we will have to face it soon. At such a point, SE Michigan can be in a position to accommodate the needed changes or can be left behind in Rust-belt desperation. Personal, cultural, and most likely regulatory changes are bound to create changes in people's transportation habits within the next 20 years that will reduce their automobile use and dramatically increase public transportation use. It would be wise and prudent for us to begin putting our resources toward transit support now.

While we clearly need to make our roadways as safe and congestion free as possible, to continue the band-aid approach of throwing more money at a freeway system that we can only hope will have its traffic diminish over time is folly. While I understand that using this money is not currently a direct reduction of funds available for transit work, there is still a reality that Michigan has limited funds at its disposal. These funds most go toward transit development for the economic, cultural and environmental health of our region.

Thank you for your time and consideration. I hope that even if you pursue an option other than the No-Build, that it will be the Enhanced No-Build alternative.

Most sincerely,

Jacob Stevens Corvidae  
612 Prentis, B4  
Detroit, MI 48201  
jacob@ic.org

From: Jim Dulzo <jimdulzo@earthlink.net>  
To: <lopezjos@mdot.state.mi.us>  
Date: 3/24/01 6:01PM  
Subject: I-94 Comment

5221 Buckingham

Detroit, MI 48224

March 24, 2001  
José A. López  
Public Hearings Officer  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, Michigan 48909

Dear Mr. Lopez,

I am writing to express my deep concern about the rebuilding and widening currently being considered by MDOT for I-94 through the center of my city, Detroit.

Like many people, I am completely sick of expressway driving--the choked roads, the endless repairs, the wheel-destroying potholes, the noise. But I am even more tired of the thinking that is coming out of Lansing in regards to solving our steadily worsening transportation problems. It is old thinking. It is unimaginative thinking. It is obsolete thinking. It is thinking that's guided by a powerful, if perhaps well-meaning, group of special interests that sees only concrete, and then still more concrete, as the only solution.

Expressways have destroyed the inner cores of so many of our urban areas. They have engendered endless sprawl that condemns people to long commutes and huge expenditures on vehicles. These roads have destroyed great neighborhoods, emptied sidewalks, killed neighborhood businesses and forced parents to become full-time taxi drivers.

It didn't used to be like this. People shopped at the end of their block, rode the streetcar to work, enjoyed a sense of community that went far beyond listening to traffic reports. Until we go back to transportation planning that aggressively pursues excellent, world-class, clean, convenient, fun-to-use, safe mass transit, things will only get worse. The bus system in Detroit is a disgrace. The system in the surrounding suburbs is only marginally better. Both are working on a starvation diet, 'competing' with a highway system that is flush with subsidy even as it continues to encourage more ruinous sprawl.

We need a rail system, not 20 lanes of freeway, to connect Port Huron to Detroit to Ann Arbor. We need a good bus system to link people to it. We need something well-done and based on the experience of the 20 other urban areas area which have figured out that mass transit is the only way to go. These are the cities with real success stories.

The \$1.3 billion your department is proposing for expanding I-94 should instead be spent on a great regional transportation system. People won't use mass transit that's only designed to serve the poor, which is what we have now. Believe me, people in both this city and its surrounding suburbs are sick of the worktime commuting mess we are in.

Please stop this gigantic boondoggie. It would destroy more neighborhoods, create more pollution, and further delay solving a

problem that need never have occurred. Let's learn from our mistakes, instead of repeating them yet again.

Sincerely,

Jim Dulzo

cc: Mayor Dennis Archer

Sen. Carl Levin

Sen. Debbie Stabenow

Congresswoman Carolyn C. Kilpatrick

State Rep. Hansen Clark

State Senator Joe Young, Jr.

**From:** <Forsterkh@aol.com>  
**To:** <senator@levin.senate.gov>  
**Date:** 3/24/01 9:46PM  
**Subject:** I-94

Dear Senator Levin;

I have heard that you have been looking into the possibility of mass transit of some sort for the Detroit area. I certainly hope that this will come to pass in the foreseeable future. Rather than the huge expenditure for a small stretch of I-94, I would prefer to see a light rail link of Metro Airport and Detroit, perhaps at New Center. This could be a start. I know that there would be a reluctance on the part of the public to utilize mass transit, however, the link to the airport could be the method to begin this trend. Perhaps even the impetus for change could come from outside the community with visitors utilizing this mode of transit. We are so far behind other metropolitan areas in this regard, and it has cost us transportation dollars that should rightfully have been ours. Please help.

**CC:** <senator@stabenow.senate.gov>, <lopezjos@mdot.state.mi.us>

From: "Malek, Barry" <Barry.Malek@national-city.com>  
To: "lopezjos@mdot.state.mi.us" <lopezjos@mdot.state.mi.us>  
Date: 3/26/01 5:57PM  
Subject: FW: I-94

> -----Original Message-----

> From: Malek, Barry  
> Sent: Monday, March 26, 2001 5:55 PM  
> To: 'lopezjos@mdot.state.mi.us'  
> Subject: FW: I-94

> -----Original Message-----

> From: Malek, Barry  
> Sent: Wednesday, March 21, 2001 2:45 PM  
> To: 'lopezjos@mdot.state.mi.us.'  
> Subject: I-94

> Mr. Lopez

- > I am writing to voice and document my disapproval of the so called
- > "renovation" of I-94 in Detroit. It is true that I-94 does need to be
- > repaved to correct pot holes. That does not mean; however that it should
- > be widened to 20 lanes. Who is benefitting from this move to add lanes and
- > make the mote and service drive the equivalent of two football fields wide
- > at cost of \$1.5 billion dollars? Not the citizen and taxpayer. Not those
- > who are forced to drive their own vehicle and commute in this METRO MESS
- > everyday without real transit choices. The bottom line is that this is
- > WASTEFUL and WRONG. Travel volume can be increased more efficiently by
- > rail as Chicago and Toronto have done. Also Speed link express buses with
- > reserve freeway lanes. \$1.5 BILLION????!! That kind of money being
- > wasted on a project that is NOT even proven to be the best alternative
- > among all possible alternatives is repugnant. With that kind of money The
- > state of Michigan could implement a regional rapid transit rail system.
- > With these kind of wasteful projects being pushed through to appease car
- > makers, road contractors, politicians of Oakland county and the City of
- > Detroit. I believe a complete audit and investigation should be carried out
- > of MDOT, DDOT, and other involved entities.
- > Special interest and politics seem to be put first rather than what is
- > best for the citizens of the region, the state, and their economies. I
- > often travel to Chicago and Cleveland for business and they have well run
- > Commuter rail, light rail, Amtrak and buses and those areas a prospering.
- > The Grand Rapids mayor with planning and foresight, is requesting a light
- > rail line, Atlanta's adding commuter rail, Florida is adding a state wide
- > commuter rail system connecting major cities. All we have in Michigan is a
- > couple Amtrak lines! Lets get with IT!!!!!! We don't need more
- > pavement, polution and congestion, we need REAL alternatives.
- >
- > Further more I don't believe the the center lanes in this proposed plan
- > will be reserved for FUTURE rail as MDOT and Detroit claim, that is a
- > sham. If Detroit and MDOT are serious about rail....DO IT FIRST, DON'T
- > TALK ABOUT IT!
- > STOP just planning and talking about it for the future to passify the
- > citizens and tax payers. You say there is no funding. WELL DO SOMETHING TO



- > CHANGE IT. Where is the 1.5 billion for I-94 coming from? Let's use THAT
- > money. When Detroit Oakland county or SEMCOG say they want a new road
- > project at the tune of Billions of dollar, MDOT NEEDS TO TAKE A LEADERSHIP
- > ROAL AS THE DEPARTMENT OF TRASPORTION AND TELL THEM THEY NEED TO IMPLEMENT
- > AN EFFICIENT REGIONAL TRANSIT PLAN FIRST, NOT A BILLION DOLLAR BAND AID.
- > in reality MDOT needs to lead the way and develop that plan.
- > Finally it is a fact that your environmental impact study was based on air
- > pollution data from the suburbs not the city of Detroit. What good is
- > that? It's not even relevant.
- > Metro Detroit citizens rank in the top for personal expenses devoted to
- > transportation. No wonder, car ownership, wear and tear, fuel, insurance
- > and precious time driving rather than riding. Yet we are lowest in the
- > nation per capita devoted to public transit options. This sounds like a
- > great story for Prime Time Live, Sixty Minutes or 20/20.
- >
- > \* If Detroit and MDOT want to improve traffic, fix the existing road,
- > open the lane that has been closed for so long and PUT IN A RAIL LINE to
- > handle the commuter traffic and give us an alternative to cars and
- > highways.
- >
- > Barry Malek

**From:** Sheinzman <sheinzman@prodigy.net>  
**To:** <lopezjos@mdot.state.mi.us>  
**Date:** 3/26/01 3:40PM  
**Subject:** Public comment on I-94 expansion

Dear Mr. Lopez;

The proposal to expand I-94 to a capacity of twenty lanes through the heart of Detroit is a classic case of over kill. I am opposed to such a concentrated use of transportation dollars. At \$1.3 billion, the twenty lane proposal goes too far.

Repairing I-94 is needed. I ask the State to scale back the twenty lane proposal to eight or possibly ten lanes maximum.

We need dollars for transportation invested in not only road repairs, but mass transit.

The need for a mass transit system that effectively and affordably meets the needs of the Detroit Metropolitan Area is of crucial importance. It is unrealistic to ask those who are unable to drive or can not afford an automobile to ride a disjointed bus duopoly 1-3 hours one way to secure employment. It is a regional economic impediment to have no passenger rail connecting our expanding Metro airport with the Downtown hub. And it is ludicrous to not take steps to reduce the congestion on our roads and freeways from passenger cars with one occupant.

Thank you for registering my comments.

Sincerely,

Scott Heinzman  
37601 Grantland  
Livonia, MI 48150

**CC:** <mayor@mayor.ci.detroit.mi.us>, <senator@levin.senate.gov>,  
<senator@stabenow.senate.gov>

**From:** Ravindra Marur <ravmarur@yahoo.com>  
**To:** <lopezjos@mdot.state.mi.us>  
**Date:** 3/26/01 9:08PM  
**Subject:** You can make a difference

Dear Sir,

I am a writing to you to express my opposition to the proposed I-94 reconstruction project in Detroit, and asking you to oppose this project as well.

Now is the right time to develop an alternative transit vision for southeastern Michigan. \$1.3 billion is too heavy a burden to place on taxpayers for a highway project that will have high continuous maintenance costs, and do little to relieve road congestion. We all know that Michigan's roads have a very short lifespan. Over time, the costs to maintain these roads will prove too high a burden for taxpayers. We all know that more roads will only lead to more cars and more traffic congestion, not less. There needs to be an alternative. Taxpayers' dollars would be better spent to help provide this alternative, an extensive mass transit system for southeastern Michigan.

Sir, you have the power to make a difference. You can change the status quo. You can fundamentally transform the short-sighted transportation ideas of the past. You can help transform southeastern Michigan into a world-class urban area. The lack of extensive mass transit will always prevent southeastern Michigan from reaching this level, and place our State's economic vibrance in jeopardy.

Sir, please help put an end to this wasteful government spending. Please, reject the proposed I-94 reconstruction project in Detroit. Please, support more mass transit for southeastern Michigan and help keep the economic vibrance of Michigan alive and well.

Thank you for your time.

RAVI MARUR  
Southfield, MI

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Do You Yahoo!?

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<http://personal.mail.yahoo.com/>

From: <Peg281944@aol.com>  
To: <mayor@mayor.ci.detroit.mi.us>, <senator@levin.senate.gov>, <senator@stabenow.senate.gov>, <lopezjos@mdot.state.mi.us>  
Date: 3/18/01 12:28PM  
Subject: Comment Period on Expansion of I-94 Ends March 27, 2001

Dear Mayor Dennis Archer  
Senator Carl Levin  
Senator Debbie Stabenow  
Public Hearings Officer, MDOT, Jose Lopez

I am opposed to the proposed expansion of I-94 for many reasons:

- \* It is an excessive design that ends up being 20 lanes wide through the 7 mile section from I-96 to Conner. Our region needs to diversify our transportation investment, not squander all of our public transportation money on concrete.
- \* The final EIS needs to review alternatives that better meet the needs of taxpayers and the future vitality of Detroit.
- \* The proposed alternative is not smart, conservative design because it will:
  - a.. Further drain vitality from the City of Detroit
  - b.. At the cost of \$1,300,000,000 for only 7 miles, drain public money from transit investments and set up the precedent to continue this wide swath through the rest of the region at huge cost for concrete.
  - c.. Miss the opportunity to add capacity through cost-saving transit components as part of the project
  - d.. Excessively burden minority communities.
  - e.. Center space for transit is fraudulent; it's really for future truck lanes.

Fix I-94 first and add capacity through transit and rail improvements!  
Otherwise, Detroit will be a sacrifice zone for trucks as they race, noisily through our city, not stopping to generate economic vitality here.

Sincerely,

Peggy S. Collins  
21310 Lathrup St.  
Southfield, MI 48075

"May power and influence flow to those who will use them for the good of the earth and her people, and be withdrawn from those who won't." Starhawk

From: Bill Houghton <bhoughton01@home.com>  
 To: "lopezjos@mdot.state.mi.us" <lopezjos@mdot.state.mi.us>, Chuck Stokes  
 <wxyz@rust.net>, "commuter@detnews.com" <commuter@detnews.com>  
 Date: 3/12/01 12:08PM  
 Subject: I-94

Dear Mr. Lopez,

MDOT is once again trying to craft a cement centric "fix" for congestion at a time when Southeast Michigan is demanding and requires more transit options. To achieve MDOT's goal of a cement "fix", MDOT is engaged in a rushed planning process for I-94, and circumventing full citizen participation during the review period by not providing adequate public notice.

Furthermore, MDOT's rush tactics will allow MDOT to avoid the inclusion of SEMCOG's transit plan, which is scheduled for completion in October 2001. SEMCOG's transit plan has the potential to illustrate there isn't a need for additional lanes on I-94. Is this why MDOT is rushing the planning process?

Is this how a taxpayer funded government agencies should operate? I thought MDOT worked for the citizens of Michigan?

Therefore, I ask, as the Detroit Free Press Editorial Board and TRU have, that MDOT delay the citizen review period and to take in to consideration SEMCOG's transit plan for Southeast Michigan before the final design for I-94 is completed.

Please see the attached web site for Transit Riders United letter to MDOT and the Detroit Free Press Editorial's request for the inclusion of SEMCOG's transit plan.

<http://www.marp.org/I94extension.htm>

Free Press: Don't commit just yet to \$1.3-billion widening plan  
[http://www.freep.com/voices/editorials/ewide2\\_20010302.htm](http://www.freep.com/voices/editorials/ewide2_20010302.htm)

Sincerely,  
 Bill Houghton  
 539 W. Marshall  
 Ferndale, Michigan 48220

CC: <james.steele@fhwa.dot.gov>, "kdkhands@voyager.net" <kdkhands@voyager.net>, motranzit <Motranzit@aol.com>, "dbalch1@mediaone.net" <dbalch1@mediaone.net>, "marp@mich.com" <marp@mich.com>, "slkhands@voyager.net" <slkhands@voyager.net>, Dan Keifer <Dckeifer@aol.com>, Sally Lawler <slawler@umich.edu>, citizensforbuses <citizensforbuses@aol.com>, hope4detroit <hope4detroit@hotmail.com>, mdotdirector <mdotdirector@mdot.state.mi.us>, Bill O'Brien <JerProj@aol.com>, Carmine Palombo

<palombo@semcog.org>, Carol Hopkins <Chopkins@co.wayne.mi.us>, Claudia Berry  
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 "Gerald D. Poisson" <poissong@co.oakland.mi.us>, D Conaway <conawayd@co.oakland.mi.us>, Ken  
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 <cocom25@worldnet.att.net>, Dingeldey <dingeldeyn@co.oakland.mi.us>, jeff geritt  
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From: Bill Houghton <bhoughton01@home.com>  
 To: <lopezjos@mdot.state.mi.us>  
 Date: 3/22/01 11:27AM  
 Subject: Please Read and Advise I-94 Feedback

Dear Mr. Lopez,

I fully support the position of Karen Kendrick-Hands (TRU) as stated in the attached Detroit Free Press Editorial of March 19, 2001 and ask that my elected officials also support Karen's position.

I-94 requires repairs; however, the current plan to expand I-94 is a waste of money!

[http://www.freep.com:80/voices/columnists/ehand19\\_20010319.htm](http://www.freep.com:80/voices/columnists/ehand19_20010319.htm)

Sincerely,  
 Bill Houghton  
 539 W. Marshall  
 Ferndale, Michigan 48220

CC: "kdkhands@voyager.net" <kdkhands@voyager.net>, motranzit <Motranzit@aol.com>, "dbalch1@mediaone.net" <dbalch1@mediaone.net>, "marp@mich.com" <marp@mich.com>, "sikhands@voyager.net" <sikhands@voyager.net>, Dan Keifer <Dckeifer@aol.com>, Sally Lawler <slawler@umich.edu>, citizensforbuses <citizensforbuses@aol.com>, hope4detroit <hope4detroit@hotmail.com>, "Gerald D. Poisson" <poissong@co.oakland.mi.us>, D Conaway <conawayd@co.oakland.mi.us>, Ken Rogers <rogersk@co.oakland.mi.us>, "RCOC@RCOCWeb.org" <RCOC@RCOCWeb.org>, "friedappel@aol.com" <friedappel@aol.com>, "timmelton@aol.com" <timmelton@aol.com>, "amosf@co.oakland.mi.us" <amosf@co.oakland.mi.us>, "cocom25@worldnet.att.net" <cocom25@worldnet.att.net>, Dingeldey <dingeldeyn@co.oakland.mi.us>, G-Hill <G-Hill@ci.detroit.mi.us>, M-Mahaffey <M-Mahaffey@ci.detroit.mi.us>, C-Cleveland <C-Cleveland@ci.detroit.mi.us>, K-Cockrel <K-Cockrel@ci.detroit.mi.us>, S-Cockrel <S-Cockrel@ci.detroit.mi.us>, K-Everett <K-Everett@ci.detroit.mi.us>, N-Hood <N-Hood@ci.detroit.mi.us>, B-Scott <B-Scott@ci.detroit.mi.us>, A-Tinsley-Williams <A-Tinsley-Williams@ci.detroit.mi.us>, WilsonA <WilsonA@mayor.ci.detroit.mi.us>, Mayor Dennis Archer <Mayor@mayor.ci.detroit.mi.us>, Greg Bowens <bowensg@mayor.ci.detroit.mi.us>, Bill O'Brien <JerProj@aol.com>, Bomar <bomars@ddot.ci.detroit.mi.us>, Bonior <david.bonior@mail.house.gov>, Carmine Palombo <palombo@semcog.org>, Carol Hopkins <Chopkins@co.wayne.mi.us>, Chuck Stokes <wxyz@rust.net>, Claudia Berry <cberry@detroitchamber.com>, "commuter@detnews.com" <commuter@detnews.com>, Conyers <john.conyers@mail.house.gov>, Dan Dirks <gmsmart@hotmail.com>, David Sanders <sanders@semcog.org>, "DEBBIE.STABENOW" <DEBBIE.STABENOW@MAIL.HOUSE.GOV>, dwoodward <dwoodward@house.state.mi.us>, Fred Salmu <FSalmu@dicksonassociates.com>, gjacobs <gjacobs@house.state.mi.us>, James Cramer <james.cramer@fhwa.dot.gov>, jeff geritt <geritt@freepress.com>, Jeff-Rich leiman-doce <rdjl@mediaone.net>, "Jensen, Barry" <bjensen@oe.homecomm.net>, Jim Roble <jroble@hotmail.com>, jscrant <jscrant@house.state.mi.us>, Kelly Thayer <kelly@mlui.org>, "King, Robert" <rjking@detnews.com>, kkilpat <kkilpat@house.state.mi.us>, Knollenberg <Rep.Knollenberg@mail.house.gov>, Lam <lam@freepress.com>, Lynn Rivers <lynn.rivers@mail.house.gov>, Mary Kramer <mkramer@crain.com>, Maryann Marantette <IUSoccer98@aol.com>, mcgruder <mcgruder@freepress.com>, mdotdirector <mdotdirector@mdot.state.mi.us>, "Ms. Gayla Houser" <gayla@troychamber.com>, Pete Waldmeir <PWaldmeir@aol.com>, rgosselin <rgosselin@house.state.mi.us>, rjohnson <rjohnson@house.state.mi.us>, "rovphi@ddot.ci.detroit.mi.us" <rovphi@ddot.ci.detroit.mi.us>, senator <senator@levin.senate.gov>, SenDDeGrow <SenDDeGrow@senate.state.mi.us>, SenPHoffman

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From: Brenda Peek  
To: Troy, Adam  
Date: 3/21/01 9:22AM  
Subject: Re: Concerns with the I-375 and I-94 Proposals

Dear Mr. Adam: The director asked that I respond to your email request. We appreciate all of your suggestions and statements. I will forward this information to the study group as part of their Public Information Program. We thank you for your inquiry and remarks.

Brenda V. Peek, Communications  
Metro Region

>>> Adam Troy <Adamt@Wam.com> 03/09/01 02:18PM >>>  
Mr. Rosine

I am not sure to whom I should direct my concerns with the I-375 and I-94 project proposals.  
If you could please pass them along to the involved parties I would appreciate it.

#### I-375

I have several reservations with the I-375 proposal. Road building and reconstruction has become a major issue in our state. I feel that we need to reconsider the building of new roads and offer other means of transportation as a viable option. I am a Detroit City Resident and I have read several studies stating how this will not be a benefit for Detroit. It will however benefit those who would like to get in and out of Detroit especially if the Casinos are located there. This is another spending of transportation funding adventure that will not help the citizens of Detroit. I request that you please look into alternative transportation. I have heard the age old argument that density does not support mass transportation, however without mass transportation we will not have the growth in density. I think we need to stand up and change the way we think about spending and what our cost to benefit ratio really is.

#### I-94

My concern is that we are not going to link downtown with Metro Airport. I feel this should be added into the proposal. If I were a foreign traveler or business man wanting to spend my time in Metro Detroit Downtown, I would not be pleased with the current options. The cab cost are enough to send a message, shouting stay away from Detroit. I feel that this would be a vital link to making Detroit a world class city. There are web pages dedicated to informing foreign travelers what cities are travel friendly and Detroit ranks worst on almost every one. The concern is I want a better Detroit which will mean a better Michigan. Today road building is out of hand. The larger the roads the larger the shift in population causing more roads to be added. Please take a step to move Detroit into the future and not into the rebuilding of antiquated roads.

Thank you for your time.

Troy  
Troy A. Adam  
495 W. Willis  
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