

Transportation Riders United [TRU]

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

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Honorable Hansen Clark

Via telefax: 961-4631

11 pages total

Dear Representative Clark:

We, the undersigned thirteen organizations, are requesting that the Federal Highway Administration [FHWA] and the Michigan Department of Transportation [MDOT] prepare an Environmental Impact Statement [EIS] of MDOT's proposed I-375 extension project in downtown Detroit. We believe that potential impacts to the human and natural environment warrant a full EIS, rather than stopping with the Environmental Assessment that MDOT prepared for their proposed I-375 expansion and that FHWA approved for public review on October 31, 2000 [MDOT's EA].

A full EIS on the I-375 project is needed to protect the human and natural environment. In addition, we would find it preferable that the evaluation of MDOT's proposal to widen I-75 through Oakland County and the evaluation of MDOT's proposed I-375 expansion be considered within one EIS, rather than be the subject of an independent evaluation. Evaluation of the Oakland County I-75 expansion proposal is a ripe issue, inasmuch as last autumn MDOT completed a feasibility study that recommended the widening of I-75 in Oakland County at a cost of \$447 million and that declared public transportation options to be infeasible, largely because of an arbitrary limitation of the project area to the boundaries of Oakland County.

The I-375 and I-75 projects are integrally, physically linked and should be considered together in order to properly and fully develop and evaluate other prudent and feasible alternatives, including public transit options.

We are asking you to join us in our requests to FHWA and MDOT on or before February 1, 2001, which is the deadline for public comments on MDOT's EA regarding I-375.

The cities of Ferndale and Birmingham have both passed unanimous resolutions supporting a single Environmental Impact Study for MDOT's I-375 and I-75 expansion proposals. The Planning Commission for the City of Detroit also recognizes these concerns and on Thursday January 18, voted unanimously to call for a single EIS to address question of East Riverfront Area [ERFA] access and I-375 within the context of other downtown developments and ongoing transit studies. At their next meeting, the commission will hear a presentation by MDOT and discuss the matter further.

Downtown Detroit's redevelopment is at a critical juncture. MDOT, the federal government, the City of Detroit and private interests are poised to spend several hundred million to address access to the East Riverfront, the Central Business District and our gateway to Canada. We are requesting an Environmental Impact Study to ensure that the project implements the goals of TEA -21:

- Provide accessibility and mobility for *all* people and goods,
- Invest strategically in transportation infrastructure to enhance the vitality of the community;
- Promote a safe and secure transportation system,
- Protect and enhance the environment

On the contrary, MDOT's selected design for the expansion of I-375, identified by MDOT as "Alternative 12A modified, meets none of these goals. In fact, MDOT's current design subverts these goals:

- It ignores transit options in a city where 1/3 of the households lack access to an automobile.
- It obstructs pedestrian access, by creating a six-block stretch of Jefferson Avenue where it is impossible to cross from the north to the south side of street.
- It eliminates the potential for establishing an attractive commuter rail service connecting Detroit's Renaissance Center and Oakland County to take the place of the service that operated on the same route until October 1983. More importantly, it eliminates the potential development of a modern commuter rail service that diminishes the need for investing over a half billion dollars in expanding I-375 in Detroit and I-75 in Oakland County.
- It eliminates other passenger and commuter rail links to downtown, even though ongoing studies of commuter rail between Metro Airport and Downtown and from Lansing via Ann Arbor to Detroit would be made more viable by relying on this rail access to East River Front Area.
- At a cost of \$72 million for 3 blocks, it is the most expensive alternative.
- It misses the opportunity to recover land for development by strategically "unbuilding" portions of the expressway.
- It creates an ugly gateway to the city and riverfront.
- It worsens air pollution and ignores environmental justice concerns.
- It ignores the additional expenditures that will be required: - \$40 million for local streets, and \$130 million high rise parking on the riverfront.
- It may substantially worsen congestion instead of relieving it.

According to FHWA's own review of transportation planning in the SEMCOG region, MDOT does not have appropriate modeling tools to consider transit fully and fairly as a component of ERFA access.

"MDOT, SEMCOG, and the transit operators do not have operational mode choice or transit network assignment models for the region. Without such tools, the ability to quantify choices; evaluate benefits and costs; and analyze tradeoffs among transit alternatives and between transit and highway projects is extremely limited. If transit visions such as *TransitChoice* or *SpeedLink* are to be seriously considered, the decision makers should have the benefit of the information that these tools can provide.

Consequently, the FHWA and FTA recommended the following:

"MDOT, SEMCOG, and the transit operators develop and refine regional travel demand forecasting tools for both highway and transit modes, including methods for evaluating and establishing regional system wide priorities linked to area wide goals and objectives."

***[FY 2000 Transportation Planning Certification, Summary Report Detroit Michigan
Prepared by FHWA and FTA, June 14-15, 2000, pp.12-14; full report available on request.]***

The EIS we are requesting will provide the opportunity to develop these essential and required tools.

According to statements on page 4 of MDOT's EA, all public transportation options were rejected as alternatives to the proposed I-375 expansion because the ones that MDOT identified were not "stand-alone" solutions. However, the commuter rail option was not even mentioned in

the EA. Further, it is important to recognize that MDOT's I-375 expansion proposal, itself does not stand-alone. For example, the proposed I-375 expansion will require an additional expenditure of \$40 million for local street improvements to accommodate the freeway extension, \$15 million of which must come from the City of Detroit, which has not budgeted for this expense. Further, MDOT's I-375 traffic forecasts assume the construction of an additional highway that usurps the commuter rail service right of way and that has a construction cost estimated by the City of Detroit to be between \$28 million and \$45 million. In addition, the auto-only access essentially mandated by the I-375 expansion proposal will compel the construction of some 13,000 new parking spaces, at approximately \$10,000 each in high rise parking structures between Jefferson Avenue and the Detroit River. The \$130 million spent on parking, not the best and highest use of urban riverfront land, is more than enough to pay for the entire capital cost of the commuter rail alternative.

None of the additional costs were considered in the Environmental Assessment. There is no mention of the secondary impacts, including run-off from a high concentration of cars so near the Detroit River.

Of the 13 different alternatives offered during the course of an eighteen month study and public outreach process, every last one has been pavement only and focusing solely on freeway, interstate style access. This is so notwithstanding broad-based and consistent public outcry for a solution that includes transit. The failure to consider feasible and prudent alternatives, and a multi-modal solution is antagonistic to the core intermodal philosophy of TEA-21.

Moreover, the traffic projections used to justify the I-375 extension are suspect. I-375 is little used except during rush hours. Even then, traffic volume is light by all big city standards. Much of the traffic problem comes from traffic using the Windsor–Detroit Tunnel, which MDOT's project proposal does nothing to alleviate. Traffic projections are overstated because they don't consider that transit alternatives, including commuter rail, could meet access needs for an additional 1700 cars per hour peak usage, at a lower cost. At Jefferson Avenue, the southbound I-375 freeway carries only 23,000 cars per day. By comparison, Jefferson and Gratiot, both three lane surface street arterials, carry an average of 35,000 cars per day. Downtown and Riverfront Access is primarily an urban design issue, not a traffic engineering problem.

Much of what is wrong with MDOT's design results from a failure to ask the correct questions in the right order of the appropriate experts. MDOT's current auto-dependent, pavement-based solution, excludes pedestrian access and interferes with realistic and doable transit options, especially right-of-way space for commuter rail. In this regard, the Environmental Assessment is simply false and wrong, when it states that the extension will not interfere with or prevent future transit possibilities.

MDOT's design destroys the opportunity to reestablish commuter-rail access to Downtown and the Renaissance Center. This downtown-rail access is vital to the recently consolidated studies of the Lansing-Ann Arbor-Detroit commuter line and commuter rail to Metro Airport as well as the potential reinstatement of commuter rail between downtown Detroit and Pontiac, which is supported by several Oakland County communities. In addition, commuter rail would reduce the need for costly expansion of I-75 within Oakland County.

Detroit is the largest metropolitan area in America without intra-city passenger rail service (light rail or commuter rail). The on-going studies of passenger rail service between downtown Detroit and Lansing and between Detroit and Detroit Metropolitan Airport represent tangible prospects for re-introducing a rail system to the Southeast Michigan region. In addition, the on-going public-private Metropolitan Affairs Coalition rapid bus study for downtown Detroit also holds promise of laying the groundwork for an excellent regional transit system. These projects, and

others, should be evaluated as a comprehensive alternative to the I-375 and Oakland County I-75 expansion proposals.

Rail can be an affordable alternative to freeway widenings. Attractive, modern, frequent commuter rail in the I-375/I-75 corridor is estimated to cost less than \$100 million to build, and take less than two years to implement. This is more than competitive with the projected \$72 million cost and two to three year construction period for expanding I-375 and the \$447 million cost and unstated time required for widening I-75. Further, implementation of the commuter rail option will require only a minimal traffic management effort during construction, whereas traffic management costs during MDOT's proposed I-375 and I-75 expansion projects are likely to be quite substantial.

We are enthusiastic about GM's proposed Urban Riverfront Village, linked river walks, and improved entrance to the Renaissance Center. Unfortunately, MDOT's design does not appear to serve GM's vision any better than it serves the community's need for improved pedestrian access. Full and fair consideration of transit must be an integral part of the access solution. At this stage in the planning process, we know of no way to address these design issues other than through the EIS process.

An urban-scale redesign would provide critical opportunities to reconnect St. Antoine between Jefferson and the River, create blocks of prime real estate for development, maintain Franklin Street as functional loading-dock access for General Motors Renaissance Center, and develop a buffer between interstate-sensitive downtown landmarks including historic Christ Church. The extension design uses excessive amounts of valuable riverfront real estate. These improvements would go a long way toward mitigating past errors.

MDOT has dismissed without careful analysis the possibility of terminating I-375 several blocks north of Jefferson, replacing the expressway lanes and service drives with urban scale surface level boulevards. At the I-75, I-375 interchange, lane capacity is misallocated. The tightly curved ramps that connect the east- west portion of I-75 to its north- south corridor allocate only two lanes for this heavily-used through routes for trucks. In the last four years at least two tank trucks have failed to negotiate the I-75 curves, resulting in fiery crashes that destroyed an overpass and claimed at least one life. This dangerous interchange is now adjacent to Ford Field and Comerica Park where thousands of people congregate outdoors, creating a risk of massive exposure to toxic spills.

By contrast I-375 has four lanes for a considerably smaller amount of traffic. The geometry of I-375, is straight, spacious and empty. This inappropriately encourages high speeds at the terminus of an urban expressway. Rather than considering steps to slow traffic well in advance of the terminus of I-375, MDOT's response, denoted by them as Alternative 12A modified, has been to extend I-375 toward the Detroit River and to expand the acreage consumed by the I-375/Jefferson interchange, thereby unnecessarily consuming prime riverfront real estate. The design of I-375 already is problematic. We must not build this highway wrong once again.

A more urban sensitive design will recover land for development, improve rather than worsen access for pedestrians, and provide the opportunity to build a modern commuter rail system. Properly designed, this access would be a strategic investment "in transportation infrastructure to enhance the vitality of the community." The low build alternative, paired with transit, is more consistent with GM's original design for its residential and commercial development.

Further this project is a perfect opportunity to serve as a Demonstration Project of how urban freeways, which ripped apart minority communities during the benighted days of "urban removal" in the 60's, can be unbuilt to restore land to neighborhoods, for economic development

and greenspace. Such a restoration could heal old wounds and mitigate decades old damage. This opportunity to make I-375 more urban would be a concrete manifestation of Environmental Justice at work.

Air quality impacts of this project are critical when one considers that Detroit's children suffer from asthma at three times the national average. The air quality analysis in the Environmental Assessment is so inadequate that even the key word exceedance is misspelled. The EA does not address the fact that SE Michigan will be nonattainment for ozone when the new 1997 health based standards eight-hour standards are implemented. There is no discussion of the impact of mobile source toxics on the human health and the Great Lakes ecosystem due to air deposition. The EA does not contain the required and appropriate conformity analysis that demonstrates that emissions resulting from this project will not interfere with the maintenance of the air quality standards, through the year 2025. Because transit was never considered there is also no analysis of air quality benefits that could flow from fewer vehicle miles traveled because of a mode shift to transit from single occupancy vehicles. Further, it is unclear which assumptions were used for MDOT's carbon monoxide hot spot modeling and why.

In conclusion, MDOT's I-375 expansion proposal must not proceed without a thorough, rigorous analysis that a well done, and independent EIS will provide. The EA is not a fair review of the impacts on the human and natural environment resulting from implementation of MDOT's proposed I-375 expansion. We request that the Federal Highway Administration (FHWA), pursuant to its powers set forth in 23 CFR 771 (Environmental Impact and Related Procedures), and specifically at 23 CFR 771.119(i) take the following actions:

(a) deny MDOT's existing or prospective application for a Finding of No Significant Impact (FONSI) with regard to the its EA,

in the event MDOT persists in developing its I-375 East Riverfront Area (hereinafter referred to as "ERFA") expansion project, require MDOT to prepare a **single** comprehensive Environmental Impact Statement (EIS) that considers together MDOT's proposed I-375 expansion project and MDOT's proposed Oakland County I-75 expansion project, so that all feasible and prudent alternatives may be identified for expanded access to the City of Detroit Central Business District and the East Riverfront Area from locations within the I-375 and I-75 corridor extending northward from the Detroit Central Business District and so that all impacts of all the feasible and prudent alternatives may be considered.

If you agree with our view regarding the need and scope for an EIS regarding the I-375 and I-75 expansion proposals, we ask that you deliver a letter of support to both of the following individuals by February 1, 2001.

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Thank you for your attention and support.

Respectfully,

Karen D. Kendrick-Hands,
Co-founder
Transportation Riders United
On behalf of:

Lana Pollack,
Executive Director
Michigan Environmental Council

Vicky Kovari
Chair
MOSES Transportation Task Force

Anne Serra
Interfaith Transportation Council

Bob Duda
Southeast Michigan Group Chairman
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Jane Mackey
Chair
Friends of Detroit River

Terrace Lang
Program Director, Urban Air Quality and
Transportation Project
Detroitters Working For Environmental
Justice

Attachments:
Resolution of the City of Ferndale
Detroit Free Press editorial, Dec. 19, 2000

Billie Hickey
Interim Director
Southwest Detroit Environmental Vision.

Paula Bowman
League of Women Voters
Detroit Metropolitan Area

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