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

MAR 14 2011

REPLY TO THE ATTENTION OF:

E-19J

Tricia M. Harr
Federal Transit Administration
1200 New Jersey Avenue, SE
East Building – E43-105
Washington, D.C. 20590

Re: **Comments on the Draft Environmental Impact Statement (DEIS) for the Woodward Avenue Light Rail Transit Project, Detroit, Wayne County, Michigan CEQ#20110016**

Dear Ms. Harr:

This letter is submitted in accordance with our agency's responsibilities under the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act. The proposed project intends to improve public transportation service capacity, mobility, equity and urban linkages along this corridor. It will support the City of Detroit's economic development goals by encouraging reinvestment in the urban core.

The U.S. Environmental Protection Agency, Region 5 (US EPA) has participated in early Southeast Michigan Council of Governments (SEMCOG) project scoping. We later participated in the Detroit Transit Options for Growth Study (DTOGS) and more recently, a pre-DEIS meeting. We submitted scoping comments for this proposal on September 15, 2010.

The Light Rail Transit Project (LRT), as proposed, would extend from Larned Street, in the core of downtown Detroit, and run at-grade past many of Detroit's functional centers along Woodward Avenue, through the City of Highland Park and out to 8 Mile Road. A Vehicle Storage Maintenance Facility and up to eight electrical Traction Power Stations are needed and would be located along the route. Alternatives considered include tracks running most of the route either in a created median along Woodward Avenue, or in parallel along both curbs. It appears that a median running design would include some median stations but also several station locations where tracks would split to allow stations to be located at the curbs. Approaching the downtown core, alternatives would either: 1) pass the Grand Circus Park and turn onto Grand River Avenue to arrive at the Rosa Parks Transportation Center on Washington Boulevard and then turn around by circling from Washington Boulevard to Randolph Street and back using Larned Street and Congress Street; 2) after Grand Circus Park turn on State Street to

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similarly arrive at the Rosa Parks Transportation Center and circle to Randolph Street and back; or 3) remain on Woodward Avenue to Larned Street and simply reverse directions to travel back out Woodward Avenue.

We have reviewed the DEIS and are providing comments regarding Purpose and Need, Alternatives, Environmental Impacts, and Mitigation of Unavoidable Impacts.

PURPOSE AND NEED

The Purpose and Need statement includes both the several transportation improvements for this corridor and the potential for economic benefits. We recommend that the Purpose and Need in the Final Environmental Impact Statement (FEIS) include potential economic benefits to accrue to the City of Highland Park as well as Detroit, consistent with the remainder of the DEIS document discussions.

ALTERNATIVES

We note that most information presented assumes significant familiarity with the City of Detroit including local names and experiences. Although the aerial photographs in Appendix D provide some answers, they are not adequate, so an added map with orientation labeling could be helpful if inserted early in section one or two. For example, such a map should outline the boundaries of Wayne State University and the Central Detroit Medical Campus. The map should also identify the structure that Alternate 3 splits and goes around on Woodward Avenue. Is the State Fairgrounds still in use for that purpose and what is its extent? The location and a detailed description of the Rosa Parks Transit Center should be included.

Apparently, final design is yet to be done, but it would be useful to decision makers to know if the DEIS has fully considered impacts for the possibility of these trains being one, two or three cars in length. The one reference to this subject does not address whether the stations are being considered appropriately for these alternative options. Station size and footprint, traffic impacts on Woodward Avenue and cross streets, and operating costs are all affected by train length options. We recommend the FEIS include a discussion of what factors can support longer trains and what factors hinder or preclude consideration of such system growth.

While Figures 2-4, 2-5, 2-7 and 2-8 offer some conceptualization of median versus curb running trains at stations, there is no similar understanding of these alternatives away from the station areas. The DEIS makes mention of turning lanes and bike lanes, but provides insufficient information to understand how these elements will be integrated with the light rail line. The station locations are symbolically indicated on the Appendix D aerial photomaps, but the FEIS should delineate more clearly how they will interface with nearby intersections; significant pedestrian pathways; median tracks moving to curbside stations at some locations; and those with particular historic impact concerns. The DEIS highlights that curbside stations will have electronic billboards on top of their roofs, but offers no presentation of their appearance. Since these are a significant concern regarding their impacts to historic locations, we recommend they

either be reconsidered for use and design, or the FEIS provide adequate photos or illustrations to depict how they will impact historic properties.

ENVIRONMENTAL IMPACTS

HAZARDOUS WASTE

Although about 300 hazardous sites have been recognized by modified Phase I Environmental Site Assessments (ESA), the necessary studies have not been completed to fully inform the DEIS reader of these impacts. The proposed use of "due-care" procedures including meeting regulatory requirements is assumed in NEPA. The FEIS should fully identify all specific sites where project impacts will occur, including an illustrative mapping, what remedial and protective measures will be taken, and what evaluation criteria will be used to assure the adequacy of public protection from possible future incidences at these sites. While reference to a detailed report is appropriate in a NEPA document, the pertinent information needs to be presented in the FEIS.

HISTORIC AND ARCHEOLOGICAL RESOURCES

Detroit has an abundance of historic sites. Many are located along this Woodward Avenue corridor. Although extensive communication occurred between the project proponents and the Michigan State Historic Preservation Office (SHPO) for these concerns, agreements have not been reached. Most concerns will apparently involve visual impacts to aesthetics of view, feel and association. As mentioned above, we recommend the proposal to mount billboards on top of stations warrants reconsideration in this regard. Catenary structures and station designs could be modified to reduce some of the visual impacts. The FEIS should provide adequate illustrative/photo examples of each impacted occasion to allow an understanding of these impacts. The FEIS should include appropriately signed documents of agreement regarding all historic and archeological sites, unavoidable impacts to them, and mitigation measures to be taken.

MITIGATION OF UNAVOIDABLE IMPACTS

We acknowledge that some impacts will not be fully known until final designs are available. However, the FEIS should include these impacts to the extent possible. Please specify details concerning the mitigation measures that will be provided, including commitments for follow-up monitoring and maintenance as appropriate.

Our review of the Woodward Avenue Light Rail Transit Project found a need for further information to adequately understand some of the impacts from this project. We note that additional information is needed to understand the impacts for alternatives, hazardous waste, and

historic and archeological sites. Therefore, we rate the DEIS as **"Environmental Concerns - Insufficient Information"** (EC-2). We refer you to the enclosed Summary of Rating Definitions Sheet for a fuller explanation of the ratings. This letter, including the rating, will be published on EPA's NEPA Website: "http://www.epa.gov/compliance/nepa/eisdata.html.".

Thank you for the opportunity to comment on this document. We look forward to reviewing future NEPA documents for this project. Should you have any questions regarding our comments, please contact me or Norm West of my staff, by phone at 312-353-5692 or by e-mail at west.norman@epa.gov.

Sincerely,

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

Enclosures: Summary of Rating Definitions Sheet

Cc: Lovevett Williams, Director
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