

Appendix G

Federal Highway Administration Concurrence that DEIS is Valid

**RE-EVALUATION SUMMARY OF THE PROPOSED DETROIT
INTERMODAL FREIGHT TERMINAL PROJECT
(Wayne and Oakland Counties)**

The Michigan Department of Transportation (MDOT) re-evaluated the Detroit Intermodal Freight Terminal (DIFT) DEIS per the Code of Federal Regulations (see 23 CFR 771.129)¹. MDOT has determined that a supplemental EIS is not warranted as the analysis for the DEIS remains valid for a reduced footprint and the analysis has kept pace with the air quality regulatory changes.

The following discussion addresses each criterion that must be evaluated before a determination can be made on this project.

Has an acceptable Final Environmental Statement (FEIS) been submitted to FHWA within three years from the date that the DEIS was approved and circulated?

No. An acceptable FEIS was not submitted to FHWA within three years from April 15, 2005 (the date that the DEIS was approved and circulated). The delay was a result of discussions with the participating railroads regarding the project footprint, and the development of the *Pre-Development Plan Agreement between the Railroads and MDOT*.

The project history is as follows:

- 1993/1994 MDOT began studying the feasibility of integrating the intermodal operations of Detroit's four Class I railroads at one site at the Detroit-Livernois Yard in Southwest Detroit.
- 2001 Project feasibility study developed.
- 2002 Notice of Intent to prepare an Environmental Impact Statement (EIS) was published on March 13.
- 2003 Scoping meetings were held on September 19th and June 4th. The June 4th meeting was held to consider the expansion of existing individual Intermodal terminals.
- 2005 The Draft EIS was prepared and signed on April 15. The DEIS did not identify a Preferred Alternative. Public hearings were held June 13, 14, 15, and 16, 2005. Ongoing consultation with the public, agencies and the railroads led to several revisions to the practical alternatives and ultimately to the Preferred Alternative, allowing this Final EIS to be prepared.

¹ Per 23 CFR 771.129: A re-evaluation of the DEIS shall be prepared in cooperation with FHWA if an acceptable FEIS is not submitted to the FHWA within 3 years from the date of the DEIS circulation. The purpose of the re-evaluation is to determine whether or not a supplement to the DEIS or a new EIS is needed.

Have there been any substantial changes to the project's scope or proposed action that would require a supplemental environmental document?

No. There has been no substantial change in the project scope or proposed action that would require a supplemental environmental document. The DEIS identified Practical alternatives and did not identify a Preferred Alternative. Since the DEIS, a Preferred Alternative was developed. It is within the scope of the Practical Alternatives, having a more confined footprint than Practical Alternatives 3 and 4, and no new impacts. See Figure 1: *Livernois Junction Yard* and Table 1: *Summary of DIFT Impacts – DEIS Practical Alternatives vs. Preferred Alternative*.

Does the project still meet the originally identified purpose and need?

Yes. The Preferred alternative still meets the purpose and need. No changes or modifications to the purpose and need for the project are proposed.

Project Purpose:

To support the economic competitiveness of southeastern Michigan and the state by improving freight transportation opportunities and efficiencies for business, industry and the military.

Project Need:

- Modern supply chain logistics, just-in-time manufacturing and deployment, and leaner organizations have revolutionized the way industry and the military transport freight.
- Intermodal freight is growing, spreading into new markets and restructuring to meet the needs of its customers.
- Detroit is one of the top Intermodal markets in the nation.
- It is the role of government (in this case MDOT) to ensure that the businesses and industries involved in freight transportation continue to have access to the market – to support jobs in Michigan and nationally, maintain the national defense, and provide a high quality of life for the region's citizens.

Have major steps to advance this project occurred since the DEIS was approved and distributed?

Yes. Major steps to advance the project have occurred since the approval of the DEIS.

1. A preferred alternative was selected and will be analyzed in the FEIS document. The definition of and ongoing refinements to the Preferred Alternative are being done in consultation with the railroads to ensure equitable treatment.
2. Development of the *Pre-Development Plan Agreement Between the Railroads and MDOT*. This Agreement is to refine the understanding and intentions of the DIFT Rail-Related Participants.
3. The air quality analysis has been update per changes in regulations and practices.
4. The project was added to the Southeastern Michigan Council of Government's (SEMCOG's) Regional Transportation Plan in November 2008.
5. Additionally, stakeholder and public involvement coordination has continued since the approval of the DEIS.

Have there been any changes in laws or regulations (federal, state, or local) occurring in which protected resources are affected by the project?

Yes. There have been changes in air quality requirements.

Since the DEIS was signed, EPA:

- Lowered the ozone standard.
- Instituted a fine particulate (PM_{2.5}) standard, with later requirements related to hot-spot analysis of both PM_{2.5} and PM₁₀.
- Issued new regulations regarding Mobile Source Air Toxics (MSATS).

The ozone standard is addressed through the regional conformity process and did not affect the regional conformity determination. The other changes required qualitative analyses in a consultation process with U.S. EPA, the Michigan Department of Environmental Quality, and SEMCOG. An Air Quality Protocol was prepared to guide the analyses. The new qualitative analyses concluded that the preferred alternative will not cause new air quality violations, worsen existing violations, or delay timely attainment.

Conclusion

A supplemental EIS is not warranted as the analysis for the DEIS remains valid for a reduced footprint and the analysis has kept pace with the air quality regulatory changes.

Recommendation

Based on the proceeding analyses and conclusions, there are no significant changes that would warrant preparation of a supplemental EIS. MDOT is ready to proceed with the Final Environmental Impact Statement (FEIS) and is asking for FHWA's concurrence.

Michigan Department of Transportation:

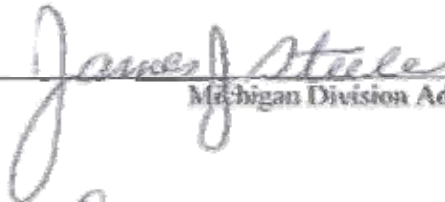


Project Planning Division Administrator

11-20-08

Date

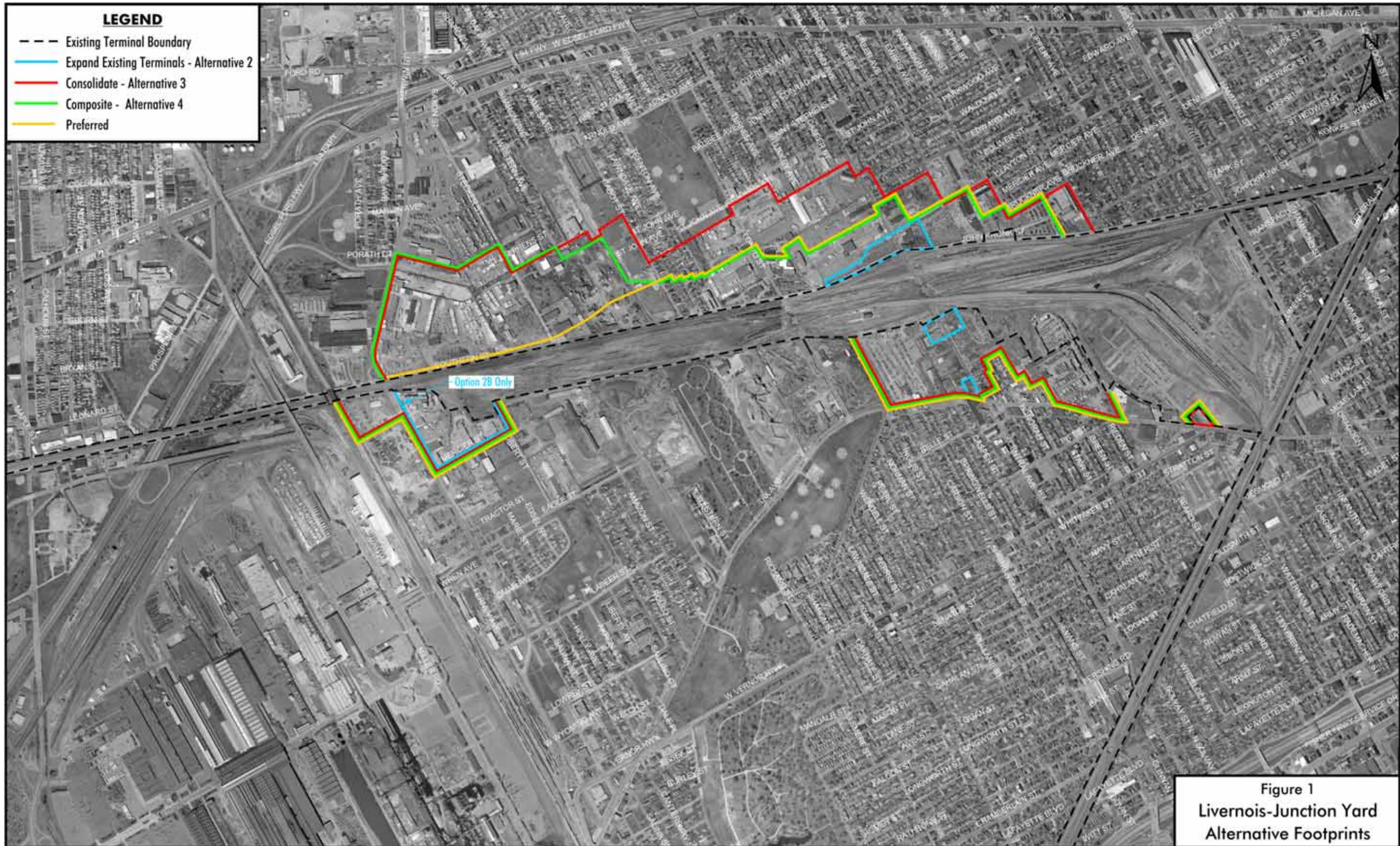
Federal Highway Administration:



Michigan Division Administrator

December 10, 2008

Date



SOURCE: The Corradino Group of Michigan, Inc.
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**Table 1
Summary of DIFT Impacts – DEIS Practical Alternative vs. Preferred**

Impact	Terminal Area →	ALT 1 - 2025 NO ACTION			ALT 2 - 2025 IMPROVE/EXPAND			ALT 3 - 2025 CONSOLIDATE	ALT 4 - 2025 COMPOSITE			PREFERRED ^e		
		LIV-JCT-CP/EXP ^a	CP/OAK	CN/MOTERM	LIV-JCT-CP/EXP ^b	CP/OAK	CN/MOTERM	LIV-JCT-CP/EXP ^c	LIV-JCT-CP/EXP ^d	CN/MOTERM	LIV-JCT-CP/EXP	CP/OAK	CN/MOTERM	
Traffic and Safety		<ul style="list-style-type: none"> Normal, non-DIFT traffic of all kinds increases. Truck traffic continues to use neighborhood streets. Acceptable volume/capacity conditions at all intersections, except at the Dix/Waterman/Vernor intersection. Continued rail/vehicle conflicts at Central and at Lonyo. 	<ul style="list-style-type: none"> Normal, non-DIFT traffic of all kinds increases. Truck traffic continues to use neighborhood streets. Acceptable volume/capacity conditions at all intersections. 	<ul style="list-style-type: none"> Normal, non-DIFT traffic of all kinds increases. Truck traffic continues to use neighborhood streets. Acceptable volume/capacity conditions at all intersections. 	<ul style="list-style-type: none"> Grade separation of Central will reduce vehicle-rail conflicts and crashes. I-94/Livernois interchange improvement will improve safety. Acceptable volume/capacity conditions at all intersections but Dix/Waterman/Vernor under Option A. 	<ul style="list-style-type: none"> Intermodal truck traffic on Artesian, Southfield Freeway service drive and other local roads reduced/eliminated. Acceptable volume/capacity conditions at all intersections. 	<ul style="list-style-type: none"> Intermodal truck traffic and idling eliminated from Fair and Chesterfield. Acceptable volume/capacity conditions at all intersections. 	<ul style="list-style-type: none"> Grade separation of Central will reduce vehicle-rail conflicts and crashes. I-94/Livernois interchange improvement will improve safety. Reduced truck traffic on local roads. Acceptable volume/capacity conditions at all intersections but five which can be made acceptable with modified signal phasing. 	<ul style="list-style-type: none"> Grade separation of Central will reduce vehicle-rail conflicts and crashes. I-94/Livernois interchange improvement will improve safety. Reduced truck traffic on local roads. Acceptable volume/capacity conditions at all intersections but five which can be made acceptable with modified signal phasing. 	<ul style="list-style-type: none"> Intermodal truck traffic and idling eliminated from Fair and Chesterfield. Acceptable volume/capacity conditions at all intersections. 	<ul style="list-style-type: none"> Grade separation of Central will reduce vehicle-rail conflicts and crashes. I-94/Livernois interchange improvement will improve safety. Reduced truck traffic on local roads. Acceptable volume/capacity conditions will be experienced at all intersections. 	<ul style="list-style-type: none"> Normal, non-DIFT traffic of all kinds increases. Truck traffic continues to use neighborhood streets. Acceptable volume/capacity conditions at all intersections. 	<ul style="list-style-type: none"> Normal, non-DIFT traffic of all kinds increases. Truck traffic continues to use neighborhood streets. Acceptable volume/capacity conditions at all intersections. 	
Community Cohesion		<ul style="list-style-type: none"> Industrial/commercial uses will continue to be mixed with residential uses. Continued rail/vehicle conflicts at Central/Lonyo. 	<ul style="list-style-type: none"> Industrial/commercial uses will continue to be mixed with residential uses. 	<ul style="list-style-type: none"> Industrial/commercial uses will continue to be mixed with residential uses. 	<ul style="list-style-type: none"> Lonyo closed. Central Avenue railroad crossing grade separated. Truck traffic reduced on neighborhood streets. 	<ul style="list-style-type: none"> Truck traffic reduced on neighborhood streets. 	<ul style="list-style-type: none"> Lonyo closed. Central Avenue railroad crossing grade separated. Truck traffic reduced on neighborhood streets. 	<ul style="list-style-type: none"> Lonyo closed. Central Avenue railroad crossing grade separated. Truck traffic reduced on neighborhood streets. 	<ul style="list-style-type: none"> Truck traffic reduced on neighborhood streets. 	<ul style="list-style-type: none"> Lonyo closed. Central Avenue railroad crossing grade separated. Truck traffic reduced on neighborhood streets. 	<ul style="list-style-type: none"> Industrial/commercial uses will continue to be mixed with residential uses. 	<ul style="list-style-type: none"> Industrial/commercial uses will continue to be mixed with residential uses. 		
Environmental Justice		<ul style="list-style-type: none"> No adverse disproportionate impact expected. 	<ul style="list-style-type: none"> No adverse disproportionate impact expected. 	<ul style="list-style-type: none"> No adverse disproportionate impact. 	<ul style="list-style-type: none"> No adverse disproportionate impact. 	<ul style="list-style-type: none"> No adverse disproportionate impact. 	<ul style="list-style-type: none"> No adverse disproportionate impact expected. 	<ul style="list-style-type: none"> No adverse disproportionate impact expected. 	<ul style="list-style-type: none"> No adverse disproportionate impact expected. 	<ul style="list-style-type: none"> No adverse disproportionate impact expected. 	<ul style="list-style-type: none"> There is a history of impacts to minority and low-income populations associated with past industrialization and transportation projects. There will be adverse disproportionate impacts from this project. 	<ul style="list-style-type: none"> No adverse disproportionate impact. 	<ul style="list-style-type: none"> No adverse disproportionate impact. 	
Land Use		<ul style="list-style-type: none"> Maintains existing land use pattern. 	<ul style="list-style-type: none"> Maintains existing land use pattern. 	<ul style="list-style-type: none"> Maintains existing land use pattern. 	<ul style="list-style-type: none"> Consistent with Detroit and Dearborn land use plans. 	<ul style="list-style-type: none"> Detroit land use plan does not mention terminal. 	<ul style="list-style-type: none"> Consistent with Detroit and Ferndale land use plans. 	<ul style="list-style-type: none"> Consistent with Detroit and Dearborn land use plans. 	<ul style="list-style-type: none"> Consistent with Detroit and Dearborn land use plans. 	<ul style="list-style-type: none"> Consistent with Detroit and Ferndale land use plans. 	<ul style="list-style-type: none"> Consistent with Detroit and Dearborn land use plans. 	<ul style="list-style-type: none"> Maintains existing land use pattern. 	<ul style="list-style-type: none"> Maintains existing land use pattern. 	
Relocations	No. of Residential Units Affected (Acquisitions)	0	0	0	<ul style="list-style-type: none"> Option A=0 Option B = 0 Option C = 0 	<ul style="list-style-type: none"> Option A=0 Option B = 0 	0	<ul style="list-style-type: none"> 71 single-family plus 12 apartment units 	<ul style="list-style-type: none"> 29 single-family plus 4 apartment units 	0	<ul style="list-style-type: none"> 28 single-family 4 apartment units 	0	0	
	No. of Business Units Affected (Acquisitions)	0	0	0	<ul style="list-style-type: none"> Option A = 8 Option B = 11 Option C = 8 	<ul style="list-style-type: none"> Option A = 5 Option B = 6 	0	64	51	0	29	0	0	
	Other Affected Properties (Acquisitions)	N/A	N/A	N/A	One institutional property at CP/Expressway	N/A	Approx. 35 acres of Fairgrounds property	None	N/A	Approx. 35 acres of Fairgrounds property	None	N/A	N/A	

^a Included the Livernois-Junction Yard, CP/Expressway, and NS/Delray and Triple Crown terminals. The CP/Expressway terminal closed in June 2005.
^b Included the existing Livernois-Junction Yard and CP/Expressway terminals. The intermodal operations of NS will be transferred to the Livernois-Junction Yard. Terminals that once served intermodal activities would serve non-intermodal railroad business. The CP/Expressway terminal closed in June 2005.
^c Included the expanded Livernois-Junction Yard to accommodate the intermodal operations of CP/Expressway, CP/Oak and CN/Moterm. These latter three terminals would serve non-intermodal railroad business. The CP/Expressway terminal closed in June 2005.
^d Included the expanded Livernois-Junction Yard to accommodate the intermodal operations of CP/Expressway and CP/Oak. These latter two terminals would serve non-intermodal railroad business. The CP/Expressway terminal closed in June 2005.
^e Only the Livernois-Junction Yard is involved in the Preferred Alternative. There are no project impacts at other terminals
^f Jobs relocated are those moved from within a terminal area to outside it due to terminal expansion. Net jobs are those gained in terminal area. Each terminal area is defined as an "impact zone" around each existing intermodal terminal.
^g NPDES is the National Pollutant Discharge Elimination System.
^h Funding will be a combination of government and railroad investment.
ⁱ DRIC is the Detroit River International Crossing, proposing a new bridge to Canada.
Source: The Corradino Group of Michigan, Inc.

Table 1 (continued)
Summary of DIFT Impacts – DEIS Practical Alternative vs. Preferred

Impact	ALT 1 - 2025 NO ACTION			ALT 2 - 2025 IMPROVE/EXPAND			ALT 3 - 2025 CONSOLIDATE	ALT 4 - 2025 COMPOSITE			PREFERRED ^e		
	Terminal Area →	LIV-JCT-CP/EXP ^a	CP/OAK	CN/MOTERM	LIV-JCT-CP/EXP ^b	CP/OAK	CN/MOTERM	LIV-JCT-CP/EXP ^c	LIV-JCT-CP/EXP ^d	CN/MOTERM	LIV-JCT-CP/EXP	CP/OAK	CN/MOTERM
Farmland/Part 361 Lands		• No active farmland, or Part 361 land needed.	• No active farmland, or Part 361 land needed.	• No active farmland, or Part 361 land needed.	• No active farmland, or Part 361 land needed.	• No active farmland, or Part 361 land needed.	• No active farmland, or Part 361 land needed.	• No active farmland, or Part 361 land needed.	• No active farmland, or Part 361 land needed.	• No active farmland, or Part 361 land needed.	• No active farmland, or Part 361 land needed.	• No active farmland, or Part 361 land needed.	• No active farmland, or Part 361 land needed.
Economic Impacts	Jobs ^f in terminal area	• Jobs Relocated: 0 • Net Jobs Gained: 194 • Terminal Area 194 • Overall 1,029	• Jobs Relocated: 0 • Net Jobs Gained: 130 • Terminal Area 130 • Overall 1,029	• Jobs Relocated: 0 • Net Jobs Gained: 88 • Terminal Area 88 • Overall 1,029	• Jobs Relocated: 0 • Net Jobs Gained: 786 • Terminal Area 786 • Overall 4,950	• Jobs Relocated: 596 • Net Jobs Gained: 187 • Terminal Area 187 • Overall 4,950	• Jobs Relocated: 0 • Net Jobs Gained: 390 • Terminal Area 390 • Overall 4,950	• Jobs Relocated: 286 • Net Jobs Gained: 2,245 • Terminal Area 2,245 • Overall 9,050	• Jobs Relocated: 275 • Net Jobs Gained: 1,956 • Terminal Area 1,956 • Overall 8,819	• Jobs Relocated: 0 • Net Jobs Gained: 695 • Terminal Area 695 • Overall 8,819	• Jobs Relocated: 231 • Net Jobs Gained: 1,542 • Terminal Area 1,542 • Overall 4,514	• Jobs Relocated: 0 • Net Jobs Gained: 130 • Terminal Area 130 • Overall 1,029	• Jobs Relocated: 0 • Net Jobs Gained: 88 • Terminal Area 88 • Overall 1,029
Air Quality	Carbon Monoxide Hot Spots	• No violations of CO standards at intersections.	• No violations of CO standards at intersections.	• No violations of CO standards at intersections.	• No violations of CO standards at intersections.	• No violations of CO standards at intersections.	• No violations of CO standards at intersections.	• No violations of CO standards at intersections.	• No violations of CO standards at intersections.	• No violations of CO standards at intersections.	• No violations of CO standards at intersections.	• No violations of CO standards at intersections.	• No violations of CO standards at intersections.
	Pollutant Burden	• Terminal burdens less than existing conditions except for PM ₁₀ and PM _{2.5} . • Roadway burdens less than existing conditions because of cleaner engines and fuels. • Regional burdens are reduced.	• Terminal burdens less than existing conditions except for PM ₁₀ and PM _{2.5} . • Roadway burdens less than existing conditions because of cleaner engines and fuels. • Regional burdens are reduced.	• Terminal burdens less than existing conditions except for PM ₁₀ and PM _{2.5} . • Roadway burdens less than existing conditions because of cleaner engines and fuels. • Regional burdens are reduced.	• Terminal burdens increase over No Action due to increased intermodal activity. • Roadway burdens virtually same as No Action. • Regional burdens are reduced.	• Terminal burdens increase over No Action due to increased intermodal activity. • Roadway burdens virtually same as No Action. • Regional burdens are reduced.	• Terminal burdens increase over No Action due to increased intermodal activity. • Roadway burdens virtually same as No Action. • Regional burdens are reduced.	• Terminal burdens increase over No Action due to increased intermodal activity. • Roadway burdens slightly less than No Action. • Regional burdens are reduced.	• Terminal burdens about same as No Action even with increased intermodal activity. • Roadway burdens slightly less than No Action. • Regional burdens are reduced.	• Terminal burdens about same as No Action even with increased intermodal activity. • Roadway burdens virtually same as No Action. • Regional burdens are reduced.	• Terminal burdens about same as No Action even with increased intermodal activity. • Roadway burdens similar to No Action. • Regional burdens will be reduced.	• Terminal burdens less than existing conditions except for PM ₁₀ and PM _{2.5} . • Roadway burdens less than existing conditions because of cleaner engines and fuels. • Regional burdens are reduced.	• Terminal burdens less than existing conditions except for PM ₁₀ and PM _{2.5} . • Roadway burdens less than existing conditions because of cleaner engines and fuels. • Regional burdens are reduced.
Noise Considerations		• No perceptible increase.	• No perceptible increase.	• No perceptible increase.	• No perceptible increase with planned barrier walls.	• No perceptible increase with planned barrier walls.	• No perceptible increase with planned barrier walls.	• No perceptible increase with planned barrier walls.	• No perceptible increase with planned barrier walls.	• No perceptible increase with planned barrier walls.	• No perceptible increase with the addition of planned barrier walls.	• No perceptible increase.	• No perceptible increase.
Surface Water Impacts		• No change	• No change	• No change	• Yard paving will improve drainage. • Storm drainage subject of NPDES ^g permitting. • Spill prevention plans will be in place. • Particulate matter that clogs sewers will be reduced.	• Yard paving will improve drainage. • Storm drainage subject of NPDES ^g permitting. • Spill prevention plans will be in place.	• Yard paving will improve drainage. • Storm drainage subject of NPDES ^g permitting. • Spill prevention plans will be in place.	• Yard paving will improve drainage. • Storm drainage subject of NPDES ^g permitting. • Spill prevention plans will be in place. • Particulate matter that clogs sewers will be reduced.	• Yard paving will improve drainage. • Storm drainage subject of NPDES ^g permitting. • Spill prevention plans will be in place. • Particulate matter that clogs sewers will be reduced.	• Yard paving will improve drainage. • Storm drainage subject of NPDES ^g permitting. • Spill prevention plans will be in place.	• Yard paving will improve drainage. • Storm drainage subject of NPDES ^g permitting. • Spill prevention plans will be in place. • Particulate matter that clogs sewers will be reduced.	• No change	• No change
Wetlands		• None	• None	• None	• 0.01 acres of Palustrine Emergent wetland of low quality	• None	• 0.07 acres of Palustrine Emergent wetland of low quality	• 0.01 acres of Palustrine Emergent wetland of low quality	• 0.01 acres of Palustrine Emergent wetland of low quality	• 0.07 acres of Palustrine Emergent wetland of low quality	• 0.01 acres of Palustrine Emergent wetland of low quality.	• None	• None

^a Included the Livernois-Junction Yard, CP/Expressway, and NS/Delray and Triple Crown terminals. The CP/Expressway terminal closed in June 2005.

^b Included the existing Livernois-Junction Yard and CP/Expressway terminals. The intermodal operations of NS will be transferred to the Livernois-Junction Yard. Terminals that once served intermodal activities would serve non-intermodal railroad business. The CP/Expressway terminal closed in June 2005.

^c Included the expanded Livernois-Junction Yard to accommodate the intermodal operations of CP/Expressway, CP/Oak and CN/Moterm. These latter three terminals would serve non-intermodal railroad business. The CP/Expressway terminal closed in June 2005.

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^e Only the Livernois-Junction Yard is involved in the Preferred Alternative. There are no project impacts at other terminals

^f Jobs relocated are those moved from within a terminal area to outside it due to terminal expansion. Net jobs are those gained in terminal area. Each terminal area is defined as an "impact zone" around each existing intermodal terminal.

^g NPDES is the National Pollutant Discharge Elimination System.

^h Funding will be a combination of government and railroad investment.

ⁱ DRIC is the Detroit River International Crossing, proposing a new bridge to Canada.

Source: The Corradino Group of Michigan, Inc.

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Summary of DIFT Impacts – DEIS Practical Alternative vs. Preferred

Impact ↓	Terminal Area →	ALT 1 - 2025 NO ACTION			ALT 2 - 2025 IMPROVE/EXPAND			ALT 3 - 2025 CONSOLIDATE	ALT 4 - 2025 COMPOSITE			PREFERRED ^e		
		LIV-JCT-CP/EXP ^a	CP/OAK	CN/MOTERM	LIV-JCT-CP/EXP ^b	CP/OAK	CN/MOTERM	LIV-JCT-CP/EXP ^c	LIV-JCT-CP/EXP ^d	CN/MOTERM	LIV-JCT-CP/EXP	CP/OAK	CN/MOTERM	
Threatened and Endangered Species		• None	• None	• None	• None	• None	• None	• None	• None	• None	• None	• None	• None	
Historic/Archaeological 4(f) Resources		• No effect	• No effect	• No effect	• Adverse effect on bridge deck at Michigan Central Depot.	• No effect	• No effect	• Removal of Michigan Box Company building and Federal Screw Works factory. Potential adverse effect on Markey and Tomms Houses.	• Removal of Michigan Box Company building.	• No effect	• Adverse effect with removal of Michigan Box Company building. • SHPO review of security wall across from 6332 Kronk for compatibility.	• No effect	• No effect	
Parklands/ Recreational Land 4(f) Resources		• No effect	• No effect	• No effect	• No effect	• No effect	• Approx. 35 acres from State Fairgrounds, a 4(f) resource would be leased to CN.	• No direct effects, indirect or cumulative negative effects. • Potential for park improvements with project.	• No direct effects, indirect or cumulative negative effects. • Potential for park improvements with project.	• Approx. 35 acres from State Fairgrounds, a 4(f) resource would be leased to CN.	• No direct effects, indirect or cumulative negative effects. • Potential for park improvements with project.	• No effect	• No effect	
Visual Effects		• Unsightly properties and streetscapes remain.	• No change	• No change	• Unsightly properties and streetscapes remain, except for improvements along Kronk with barrier walls.	• Barrier wall along north edge of terminal.	• Barrier wall along east edge of terminal.	• Removal of some unsightly properties through acquisition. • Barrier wall along north edge of terminal. • Directional lighting near residential areas will be used to reduce/avoid light intrusion.	• Removal of some unsightly properties through acquisition. • Barrier wall along north edge of terminal. • Directional lighting near residential areas will be used to reduce/avoid light intrusion.	• Barrier wall along east edge of terminal.	• Removal of some unsightly properties through acquisition. • Barrier wall along north edge of terminal. • Directional lighting near residential areas will be used to reduce/avoid light intrusion.	• No change	• No change	
Contaminated Sites		• No sites around terminal area expected to change • Potential to remediate up to 10 acres for non-terminal intermodal activity	• No sites around terminal area expected to change • Potential to remediate up to 5 acres for non-terminal intermodal activity	• No sites around terminal area expected to change • Potential to remediate up to 5 acres for non-terminal intermodal activity	• 9 sites around terminal area need additional testing • Potential to remediate up to 40 acres for non-terminal intermodal activity	• 6 sites around terminal area need additional testing • Potential to remediate up to 15 acres for non-terminal intermodal activity	• No sites involved • Potential to remediate up to 20 acres for non-terminal intermodal activity	• 45 sites need additional testing • Potential to remediate up to 120 acres for non-terminal intermodal activity	• 37 sites need additional testing • Potential to remediate up to 100 acres for non-terminal intermodal activity	• No sites involved • Potential to remediate up to 20 acres for non-terminal intermodal activity	• 27 sites need additional testing • Up to 100 acres for non-terminal intermodal activity will be remediated.	• No sites around terminal area expected to change • Potential to remediate up to 5 acres for non-terminal intermodal activity	• No sites around terminal area expected to change • Potential to remediate up to 5 acres for non-terminal intermodal activity	
Soils		• No change	• No change	• No change	• Former clay pits would need geotechnical testing prior to any construction of structures.	• No change	• No change	• Former clay pits would need geotechnical testing prior to any construction of structures.	• Former clay pits would need geotechnical testing prior to any construction of structures.	• No change	• Former clay pits will need geotechnical testing prior to construction of any structures.	• No change	• No change	

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Impact	Terminal Area	ALT 1 - 2025 NO ACTION			ALT 2 - 2025 IMPROVE/EXPAND			ALT 3 - 2025 CONSOLIDATE	ALT 4 - 2025 COMPOSITE			PREFERRED*		
		LIV-JCT-CP/EXP ^a	CP/OAK	CN/MOTERM	LIV-JCT-CP/EXP ^a	CP/OAK	CN/MOTERM	LIV-JCT-CP/EXP ^a	LIV-JCT-CP/EXP ^a	CN/MOTERM	LIV-JCT-CP/EXP	CP/OAK	CN/MOTERM	
Indirect and Cumulative		<ul style="list-style-type: none"> Perpetuates current conditions/trends in traffic, economics, land use, community effects, noise, cultural resources, contaminated sites and water quality. Pollution reduced by cleaner engines/fuel. 	<ul style="list-style-type: none"> Perpetuates current conditions/trends in traffic, economics, land use, community effects, noise, cultural resources, contaminated sites and water quality. Pollution reduced by cleaner engines/fuel. 	<ul style="list-style-type: none"> Perpetuates current conditions/trends in traffic, economics, land use, community effects, noise, cultural resources, contaminated sites and water quality. Pollution reduced by cleaner engines/fuel. 	<ul style="list-style-type: none"> No negative traffic congestion Some business expansion expected. Unwanted mixing of land uses must be resisted. No adverse air quality effects. Ambient noise levels may increase. Existing controls must be enforced to avoid adverse cultural resource impacts. Some contaminated property reclaimed. Available infrastructure will be able to handle stormwater from additional development, but no certainty exists. 	<ul style="list-style-type: none"> No negative traffic congestion. Some business expansion expected. Unwanted mixing of land uses must be resisted. No adverse air quality effects. Ambient noise levels may increase. Existing controls must be enforced to avoid adverse cultural resource impacts. Some contaminated property reclaimed. Available infrastructure will be able to handle stormwater from additional development, but no certainty exists. 	<ul style="list-style-type: none"> No negative traffic congestion. Some business expansion expected. Unwanted mixing of land uses must be resisted. No adverse air quality effects. Ambient noise levels may increase. Existing controls must be enforced to avoid adverse cultural resource impacts. Some contaminated property reclaimed. Available infrastructure will be able to handle stormwater from additional development, but no certainty exists. 	<ul style="list-style-type: none"> No negative traffic congestion. Some business expansion expected. Unwanted mixing of land uses must be resisted. No adverse air quality effects. Ambient noise levels may increase. Existing controls must be enforced to avoid adverse cultural resource impacts. Some contaminated property reclaimed. Available infrastructure will be able to handle stormwater from additional development, but no certainty exists. 	<ul style="list-style-type: none"> No negative traffic congestion. Some business expansion expected. Unwanted mixing of land uses must be resisted. No adverse air quality effects. Ambient noise levels may increase. Existing controls must be enforced to avoid adverse cultural resource impacts. Some contaminated property reclaimed. Available infrastructure will be able to handle stormwater from additional development, but no certainty exists. 	<ul style="list-style-type: none"> No negative traffic congestion. Some business expansion expected. Unwanted mixing of land uses must be resisted. No adverse air quality effects. Ambient noise levels may increase. Existing controls must be enforced to avoid adverse cultural resource impacts. Some contaminated property reclaimed. Available infrastructure will be able to handle stormwater from additional development, but no certainty exists. DRICⁱ project will reduce I-75 access to Livernois/Dragon 	<ul style="list-style-type: none"> Perpetuates current conditions/trends in traffic, economics, land use, community effects, noise, cultural resources, contaminated sites and water quality. Pollution reduced by cleaner engines/fuel. 	<ul style="list-style-type: none"> Perpetuates current conditions/trends in traffic, economics, land use, community effects, noise, cultural resources, contaminated sites and water quality. Pollution reduced by cleaner engines/fuel. 		
	Energy	<ul style="list-style-type: none"> Continues past trends. 	<ul style="list-style-type: none"> Continues past trends. 	<ul style="list-style-type: none"> Continues past trends. 	<ul style="list-style-type: none"> Energy used during construction. Improved efficiencies from conversion of some freight shipments from truck to rail. 	<ul style="list-style-type: none"> Energy used during construction. Improved efficiencies from conversion of some freight shipments from truck to rail. 	<ul style="list-style-type: none"> Energy used during construction. Improved efficiencies from conversion of some freight shipments from truck to rail. 	<ul style="list-style-type: none"> Energy used during construction. Improved efficiencies from conversion of some freight shipments from truck to rail. 	<ul style="list-style-type: none"> Energy used during construction. Improved efficiencies from conversion of some freight shipments from truck to rail. 	<ul style="list-style-type: none"> Energy used during construction. Improved efficiencies from conversion of some freight shipments from truck to rail. 	<ul style="list-style-type: none"> Energy will be used during construction. Improved efficiencies from conversion of some freight shipments from truck to rail. 	<ul style="list-style-type: none"> Continues past trends. 	<ul style="list-style-type: none"> Continues past trends. 	
Implementation Project Cost (millions 2004)	Land Acquisition and Remediation	No government investment			\$97.5 ^b			\$125.0 ^h	\$114.9 ^h			<ul style="list-style-type: none"> Land Acquisition and Relocation: \$104 	No government investment	No government investment
	Construction	No government investment			\$169.7 ^h			\$457.7 ^h	\$436.0 ^h			<ul style="list-style-type: none"> Construction: \$386 	No government investment	No government investment
	Community Benefits	NA			NA			NA	NA			<ul style="list-style-type: none"> Community Benefits: \$10 	No government investment	No government investment
	Total	No government investment			\$267.2 ^h			\$582.7 ^h	\$550.9 ^h			<ul style="list-style-type: none"> Total: \$500 	No government investment	No government investment

^a Included the Livernois-Junction Yard, CP/Expressway, and NS/Delray and Triple Crown terminals. The CP/Expressway terminal closed in June 2005.
^b Included the existing Livernois-Junction Yard and CP/Expressway terminals. The intermodal operations of NS will be transferred to the Livernois-Junction Yard. Terminals that once served intermodal activities would serve non-intermodal railroad business. The CP/Expressway terminal closed in June 2005.
^c Included the expanded Livernois-Junction Yard to accommodate the intermodal operations of CP/Expressway, CP/Oak and CN/Moterm. These latter three terminals would serve non-intermodal railroad business. The CP/Expressway terminal closed in June 2005.
^d Included the expanded Livernois-Junction Yard to accommodate the intermodal operations of CP/Expressway and CP/Oak. These latter two terminals would serve non-intermodal railroad business. The CP/Expressway terminal closed in June 2005.
^e Only the Livernois-Junction Yard is involved in the Preferred Alternative. There are no project impacts at other terminals
^f Jobs relocated are those moved from within a terminal area to outside it due to terminal expansion. Net jobs are those gained in terminal area. Each terminal area is defined as an "impact zone" around each existing intermodal terminal.
^g NPDES is the National Pollutant Discharge Elimination System.
^h Funding will be a combination of government and railroad investment.
ⁱ DRIC is the Detroit River International Crossing, proposing a new bridge to Canada.
Source: The Corradino Group of Michigan, Inc.

Appendix H

Environmental Justice Analysis Approach

Environmental Justice Analysis Approach

The methodology that was used to conduct an Environmental Justice analysis of the study area followed MDOT and FHWA guidelines (U.S. DOT Order 5610.2). That methodology has several steps that need to be followed along with a series of questions that need to be asked and answered in order to determine if there will be disproportionately high and adverse effects on minority population groups or low-income population groups in the study area.

Step One: Determine if a minority population group or low-income population group is present in the study area.

Step Two: Determine whether project impacts associated with the identified low-income and minority populations are disproportionately high and adverse. The questions that need to be asked are:

Question 1: Is the anticipated adverse impact high? Any impact which exceeds a state or federal standard should be considered high. If an impact is determined to be “significant” per NEPA, it would also be considered high. In some areas there may be quantitative standards to draw upon, e.g. noise, air quality, water quality, contamination, etc. In other impact areas the decision will be based on qualitative standards. A public involvement effort will often be necessary to address qualitative impacts thoroughly.

Question 2: Is the high and adverse impact anticipated to fall disproportionately on a low-income or minority population?

Both questions need to be answered to determine whether there may be disproportionate impacts. The first question is whether the overall adverse impact is predominantly borne by the minority or low-income group? If the answer is "NO," then the impact may not be disproportionate in nature. The second question is whether the adverse effect is “appreciably more severe” than that experienced by a non-minority or non-low-income person. If it is determined that there are disproportionately high and adverse impacts to minority and/or low-income populations, then proceed to Step Three.

Step Three: Propose measures that will avoid, minimize, and/or mitigate disproportionately high and adverse impacts and provide offsetting benefits and opportunities to enhance communities, neighborhoods and individuals affected by the proposed project.

Step Four: If after further mitigation, enhancements, and off-setting benefits to the affected populations, there remains a high and disproportionate adverse impact to minority populations or low-income populations then the following questions must be considered:

Question 1: Are there further mitigation measures that could be implemented to avoid or reduce the adverse effect? If further mitigation measures exist, then those measures must be implemented unless they are “not practicable.”

Question 2: Are there other additional alternatives to the proposed action that would avoid or reduce the impact to low-income or minority populations? If such an alternative(s) exists, and it is “practicable,” then that alternative must be selected. If further mitigation or alternatives that avoid the impact are judged to be not practicable, that conclusion must be documented, supported by evidence, and included in the NEPA document.

Question 3: Considering the overall public interest is there a substantial need for the project?

Question 4: Will the alternatives that would still satisfy the need for the project and have less impact on the protected populations have other impacts that are more severe than the proposed action, or have increased costs of extraordinary magnitude.

Step Five: Include all findings, determinations, or demonstrations in the environmental document prepared for the project.