

## **SECTION 5**

### **MITIGATION OF IMPACTS**

This section applies to all Action Alternatives, unless otherwise stated.

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

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

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

A Conceptual Stage Relocation Plan has been prepared (Appendix B). The following standard procedures will be followed.

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

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

*Business and Non-profit Organizations* – MDOT is required by statute to offer relocation to displaced businesses and non-profit organizations. MDOT has specific programs that will implement the statutory and constitutional requirements of property acquisition and relocation of eligible displacees. Appropriate measures will be taken to ensure that all eligible displaced businesses or non-profit organizations are advised of the rights, benefits, and courses of action open to them. Displaced businesses and organizations will be encouraged to relocate within the same community.

*Purchasing Property* – MDOT will pay just compensation for fee purchase or easement use of property required for transportation purposes. “Just compensation” as defined by the courts is the payment of “fair market value” for the property rights acquired, plus allowable damages to any remaining property. “Fair market value” is defined as the highest price estimated, in terms of money, the property would bring if offered for sale on the open market by a willing seller, with a reasonable time allowed to find a purchaser, buying with the knowledge of all the uses to which it is adapted, and for which it is capable of being used.

*Relocation Information* – A booklet entitled “Your Rights and Benefits” detailing the relocation assistance program can be obtained from the Michigan Department of Transportation, Real Estate Support Area, PO Box 30050, Lansing, Michigan, 48909 or phone (517) 373-2200.

*Property Acquisition Information* - A booklet entitled “Public Roads & Private Property” detailing the purchase of private property can be obtained from the Michigan Department of Transportation, Real Estate Support Area, P. O. Box 30050, Lansing, Michigan, 48909 or phone (517) 373-2200.

## **5.2 Barrier Walls for Terminal Security**

Barrier walls for terminal security would be provided under all Action Alternatives as an integral part of the proposed project. Under Alternative 2, at the Livernois-Junction Yard, they would be along the north side of the terminal. A barrier wall would be built on the south side of the Livernois-Junction Yard east of Central. This barrier wall has been defined in height to also abate noise (per MDOT’s Noise Policy) as well as provide security. A barrier wall for security purposes will be placed on the north side of the CP/Oak terminal. Similarly, a barrier wall for security would also be provided on the east side of the railroad tracks to protect the neighborhood there, if the CN/Moterm terminal were expanded into the State Fairgrounds (Alternatives 2 and 4). It, too, has been defined in height to also abate noise. A barrier wall will also be placed on the west side of the terminal between the State Fairgrounds and railroad activity.

Under Alternatives 3 and 4 the same walls would be provided as under Alternative 2 adjusted as necessary by the north boundary of the terminal at the Livernois-Junction Yard.

## **5.3 Soil Erosion and Sedimentation Control**

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

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

The following is a list of the mitigation measures for this project to be carried out in accordance with permit requirements.

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

## **5.4 Environmental Permits**

For each Action Alternative construction activities will involve obtaining permits in several areas to ensure appropriate steps are taken to protect existing/remaining resources. Impacts on bodies of water such as lakes, streams, drains and wetlands will require permits under federal and state law:

### Federal

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

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

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

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

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

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

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

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

## **5.5 Existing Vegetation**

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

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

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

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

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

## **5.7 Groundwater Quality**

The sealing of water wells, septic systems, and sewer lines for the protection of groundwater quality will be ensured by the enforcement of MDOT specifications imposed on the contractor during construction. For houses or other structures with sewer service that are relocated or must be razed, sewer lines will be filled with concrete grout at the basement level, and water will be turned off at the street. In rural areas, the sewer line to the septic tank must be filled at the

basement level. Abandoned water wells will be filled with grout applied from the bottom upwards through a conduit extended to the bottom of the well in one continuous operation until the well is filled. The contractor must also meet all local and Michigan Department of Community Health (MDCH) requirements.

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

The above specifications have been approved by the Michigan Department of Community Health. The contractor will also be referred to the local health department for assistance when special conditions such as flowing wells or wells with a high artesian head are encountered. If high water tables are encountered in cut sections, special methods will be used to reduce any negative effects on the area groundwater.

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

## **5.8 Surface Water Quality**

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

## **5.9 Maintaining Traffic During Construction**

The disruption of traffic in the construction area will be minimized to the extent possible. All construction areas and altered traffic patterns will be clearly marked during the construction phase. A preliminary construction staging program for each Action Alternative has been developed and is the subject of ongoing review to ensure the constructability of the project and minimize impacts to the local neighborhoods and the motoring public. If an Action Alternative is chosen, the preliminary staging plan expects project implementation to begin in 2006 and conclude by 2015, depending on the alternative chosen. Modification of the I-94/Livernois Avenue ramps in the northeast and northwest quadrants of the interchange is expected to be accomplished in one construction season (March through November). Lonyo will not be closed before construction of the Central Avenue underpass is complete. The under pass is expected to take at least two years to construct.

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

Utilities will require relocation or adjustment. In doing so, coordination between MDOT and the affected utility company will take place during design, prior to actual construction. Proposed

staging plans will also be presented to utilities to make them aware of the project. Service to the project area will be maintained with temporary connections during construction so service interruptions will be minimized.

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

Barrier walls for security purposes, included in terminal design, will be installed first, to the extent practicable, in areas to minimize noise due to construction and, later, terminal operation on sensitive receptors (e.g., north of Kronk at the Livernois-Junction Yard and south of Eight Mile Road, east of the Fairgrounds).

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

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

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

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

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

*Bituminous and Concrete Plants:* All bituminous and Portland cement concrete proportioning plants and crushers will meet the requirements of the rules of Part 55 of Act 451, Natural Resources and Environmental Protection. For any portable bituminous or concrete plant or crusher, the contractor must apply for a permit-to-install or general permit. This permit should be applied for a minimum of 45 calendar days for plants with an active MDEQ permit (or 75 calendar days for plants not previously permitted in Michigan) prior to the plant being installed.

Dust collectors must be provided on all bituminous plants. Dry, fine aggregate material removed from the dryer exhaust by the dust collector must be returned to the dryer discharge unless otherwise directed by the project engineer.

## **5.13 Wetland Mitigation**

Preliminary consultation regarding mitigation for wetlands was undertaken during delineation of wetlands. Mitigation of proposed wetland impacts has followed three sequential steps: 1) avoidance of wetlands where feasible, 2) minimization of unavoidable impact by adjustments to

the project alignment and typical section, and 3) compensatory wetland construction or restoration. The first two steps have been integral to project development. Specific mitigation measures would be done in accordance to all applicable statutes administered by appropriate agencies.

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

Compensatory wetland restoration or creation is planned, in accordance with state and local wetland protection ordinances, to mitigate unavoidable impacts to approximately 0.01 acres of wetlands at the Livernois-Junction Yard (Alternatives 2, 3 and 4) and 0.07 acres at the Fairgrounds (Alternatives 2 and 4). These areas are made up of marginal wetlands of minor environmental significance. These wetlands are proposed for mitigation at a 1:1 ratio, so there is a mitigation need of about 0.08 acres.

Both wetlands impacted by Alternatives 2, 3 and 4 are Palustrine Emergent of low biological quality. The wetland at the Livernois-Junction Yard is dominated by common reed (*Phragmites australis*) and willow (*Salix* spp.). The wetland at the Fairgrounds supported 13 wetland plant species.

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

## **5.14 Contamination**

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

Investigations were done for 67 individual sites and up to 45 sites have been identified for a Phase II survey, depending on which alternative is selected. Additional soil borings will be required to further identify potential contamination along the selected alternative. Contamination areas will be marked on all construction plans. A Utility Plan will also be prepared to ensure no deep utility cuts will impact and/or spread existing contamination. A Risk Assessment Plan will be developed to include a Worker Health and Safety Plan. All contaminated materials will be properly disposed of. All monitoring wells will be properly sealed and abandoned.

## **5.15 National Geodetic Survey Monuments**

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

## **5.16 Cultural Resources**

Several properties eligible for listing on the *National Register of Historic Places* may be affected by the project. Where prudent and feasible, they will be avoided. Where it is not prudent and feasible to avoid an historic resource, the impact will be minimized to the extent possible and there will be mitigation. Coordination with the SHPO will continue in order to document impacts and mitigation measures.

## **5.17 Additional Mitigation or Modifications**

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

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

These preceding mitigation concepts are based on the best information available through May 2005.

It is noted elements that are part of each terminal's design (paving, lighting, barrier walls for security, Central Avenue underpass) are covered in a Memorandum of Understanding (MOU). The MOU accompanies this DEIS as Appendix F. The MOU is the basis of a more detailed agreement, to be developed/executed once a preferred alternative is identified and before the FEIS is issued. In those areas around the terminals where Federal Highway Administration Noise Abatement Criteria are exceeded due to terminal activity, the barrier walls will be designed to reduce terminal noise a minimum of 5 dBA below the criteria levels.

**Detroit Intermodal Freight Terminal DEIS  
Green Sheet: Project Mitigation Summary<sup>a,b</sup>**

<i>Impact Category</i>	<i>Mitigation Measures</i>
<b>I. Social and Economic Environment</b>	
a. Visual Effects	Buffers/barrier walls are planned at the Livernois-Junction Yard under Alternatives 2, 3, and 4 and at CP/Oak along the north side (Alternative 2), and along the east side of the railroad tracks at the Fairgrounds (Alternatives 2 and 4). Buffer/barrier wall construction and construction materials will be discussed with the affected public in the vicinity of potential construction.
b. Relocations	Adequate replacement housing and industrial/commercial space is available to replace up to 83 dwelling units and 64 businesses that could be relocated.
c. Recreational	Approximately 35 acres of the Michigan State Fairgrounds will be affected for Alternatives 2 and 4. Coordination with Michigan Department of Agriculture will occur in order to document impacts and mitigation measures including provision of parking during the State Fair.
d. Noise	Project noise levels exceed FHWA Noise Abatement Criteria at several locations adjacent to terminals. Barrier walls are planned as part of the project for security purposes. In noise sensitive areas, these barrier walls will be designed to also provide noise abatement. <sup>a</sup>
<b>II. Natural Environment</b>	
a. Wetlands	A maximum of 0.08 acres of impacted wetlands will be replaced under the “moment of opportunity” arrangement where the mitigation will be rolled into another mitigation project elsewhere in the state. A permit will be obtained from the Michigan Department of Environmental Quality for using this wetland.
b. Tree Removal/ Clearing/Landscaping	Mature trees will be preserved where possible. Property owners will be notified before any trees in front of their residences are removed and will be offered replacement trees.
c. Water Quality	For runoff, storm water management facilities will include detention basins and oversized pipes. Storm water at all terminals flows to combined sanitary/storm sewers. Storm water management will be incorporated into the project’s final design.
<b>III. Hazardous / Contaminated Materials</b>	
a. Contaminated Sites	A <i>Project Area Contamination Survey</i> has been completed. Up to 45 sites have been identified for a Phase II survey, depending on which alternative is selected, prior to right-of-way acquisition. More soil borings will be needed. Contamination areas will be marked on all construction plans. Proper disposal of any hazardous/contaminated material will occur. All monitoring wells will be properly abandoned. A Utility Plan will also be prepared to ensure no deep utility cuts will impact and/or spread existing contamination. A Risk Assessment Plan will be developed to include a Worker Health and Safety Plan.
<b>IV. Cultural Environment</b>	
a. Historic	Several properties eligible for listing on the National Register of Historic Places may be affected by this project. Coordination with the SHPO will continue in order to document impacts and mitigation measures.

V. Construction	
a. Vibration	Basement surveys will be offered in areas where vibration effects could occur. These areas will be identified during the design phase, where pavement and bridge removal will occur, or where piling and/or steel sheeting is planned. Impacts are not anticipated at this time.
b. Maintenance of Traffic	Modification of the I-94 ramps in the northwest and northeast quadrants of the interchange at Livernois will require temporary detours. The construction of the Central Avenue underpass will require a detour to Lonyo Avenue. Lonyo will not be closed until the Central Avenue underpass is complete.

<sup>a</sup>It is noted elements that are part of each terminal's design (paving, lighting, barrier walls for security, Central Avenue underpass) are covered in a Memorandum of Understanding (MOU). The MOU accompanies this DEIS as Appendix F. The MOU is the basis of a more detailed agreement, to be developed/executed once a preferred alternative is identified and before the FEIS is issued. In those areas around the terminals where Federal Highway Administration Noise Abatement Criteria are exceeded due to terminal activity, the barrier walls will be designed to reduce terminal noise a minimum of 5 dBA below the criteria levels.

<sup>b</sup>This Project Mitigation Summary Green Sheet contains the project specific mitigation measures being considered at this time. These mitigation items may be modified during the FEIS or Record of Decision (ROD), final design, right-of-way acquisition, or construction phases of the project.

# SECTION 6

## DRAFT SECTION 4(f) EVALUATION

### 6.1 Introduction

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

The Federal Highway Administration (FHWA) has determined the project will result in adverse effects on the potentially historic properties and recreational resources noted below if Alternatives 2, 3 and 4 (Table 6-1) were selected:

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

**Table 6-1**

**Potential National Register Eligible Cultural Resources and Recreational Resources Adverse Effects**

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

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

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

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

Expanded intermodal terminals would adversely affect these properties. FHWA has consulted with the State Historic Preservation Officer (SHPO) and the Michigan State Fairgrounds on determinations of eligibility and effect and to develop measures to minimize harm. This draft Section 4(f) document was prepared for processing under the procedures set forth in FHWA regulation 23 CFR 771.135. A draft Memorandum of Agreement (MOA) is included in Appendix C and a final MOA will be developed, as appropriate, for inclusion in the FEIS.

## **6.2 Proposed Action and Need for Project**

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

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

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

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

- Buffering existing intermodal facility from nearby neighborhoods through improvements that reduce noise and use trees, vegetation and other enhancements to improve the terminal's exterior appearance and security.

The proposed intermodal improvements are needed to handle the increasing intermodal volumes, which have grown from 283,000 lifts in 1992 to 348,000 lifts in 2002. The capacity of the existing intermodal terminals in the region is about 345,000 annual lifts. The forecast demand for 2025, if no extraordinarily positive trends occur, would range from about 500,000 to 800,000 annual lifts.

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

## 6.3 Description of Resources

### 6.3.1 Historic Resources

The *National Register of Historic Places* (NRHP) was created by the National Historic Preservation Act of 1966 and is administered by the National Park Service. The NRHP has established criteria for determining historic significance. These criteria require a property to have integrity of location, design, setting, materials, workmanship, feeling, and association. Additionally, the property must meet one of the following: Criterion A) be associated with a significant event; Criterion B) be associated with the lives of significant persons; Criterion C) embody the distinctive characteristics of a type, period or method of construction, or represent the work of a master; or, Criterion D) have yielded or be likely to yield information important in history or prehistory (usually archaeological sites). A property typically has to be 50 years old or older to be considered *National Register* eligible. No known *National Register* eligible archaeological sites were found at any of the terminals. However, the SHPO has agreed with the assessment that field investigations at two archaeological sites at the Livernois-Junction Yard should be conducted to determine whether archaeological deposits are present prior to any construction (see letter dated November 22, 2004 in Appendix A). A discussion of properties considered eligible and expected to experience adverse effects with the project follows.<sup>1</sup>

#### **Michigan/General Box Company (Spranger/Detroit Wire Wheel Corporation) 7175 Clayton Street, Detroit**

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

Information about the wheel company and its participating officers is scanty. The founder-president of the firm, Nichols M. Spranger, was a successful Detroit physician before, during, and after his venture as a would-be automotive parts manufacturer. His associates in the wheel manufacturing business were Jacob M. Schaefer, vice president; John Reinke, secretary; and William Finzel, treasurer. All three continued with the business as it later transitioned into the

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<sup>1</sup> In addition to the properties considered eligible for the *National Register* and expected to experience adverse effects, there is one more property at the Livernois-Junction Yard where the final determination about effect has not been concurred in by the SHPO (the house at 6332 John Kronk). This determination will be made prior to the FEIS. If it is determined that there will be an adverse effect (or a use) at this site, it will be added to the 4(f) statement.

Detroit Wire Wheel Corporation. Spranger was, however, replaced as president by Frederick R. Schmalziedt, while J. Robert Wilken was added to the list of officers as General Manager. In 1917, the Spranger Wire Wheel factory was exclusively devoted to automotive supply. The choice of factory location placed the facility adjacent to the railroad and the Prest-O-Light Company's automotive headlamp factory, which was built in 1916.

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

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

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

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

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

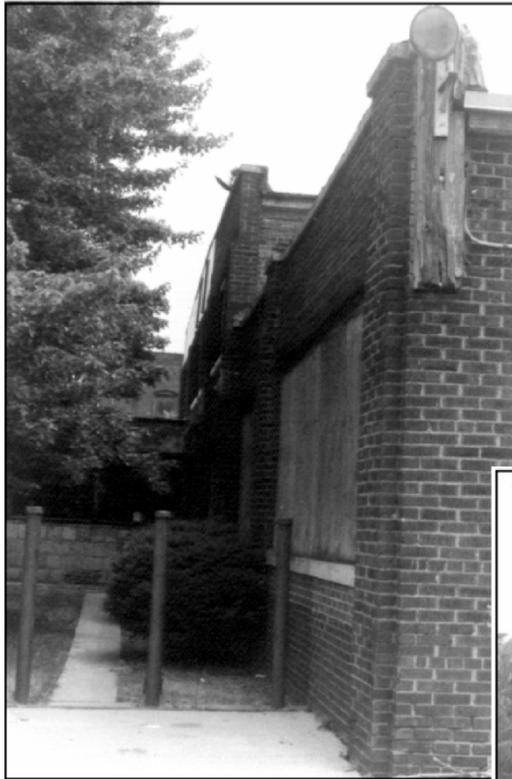
This property is privately owned. It is currently occupied by Fontana Forest Products which produces wooden pallets and containers.



West wall, view to northeast.



North wall detail, view to south.



North wall, view to east.



North wall, view to southwest.

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

SOURCE: Commonwealth Cultural Resources Group, Inc.

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## **Federal Screw Works Factory 3301/3401 Martin Street, Detroit**

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

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

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

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

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

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



Source: Michigan Department of Transportation

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

### **Markey House, 3504 Martin Avenue, Detroit**

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

The dwelling at 3504 Martin Avenue was built in ca. 1865 by Michael Markey a successful Irish-born farmer who had settled in Springwells Township in 1848/1849. As of 1870 Markey's dwelling figured as a conspicuous component of his \$12,500.00 estate as valued in federal census. He, thus, was among the wealthier residents of Springwells Township. Following his death in June 1875, the residence continued to be occupied by his son, Matthew. In 1885, Matthew was listed as a wood and coal dealer with a stand on Livernois Avenue. He continued to reside at 3504 Martin through at least 1911.

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

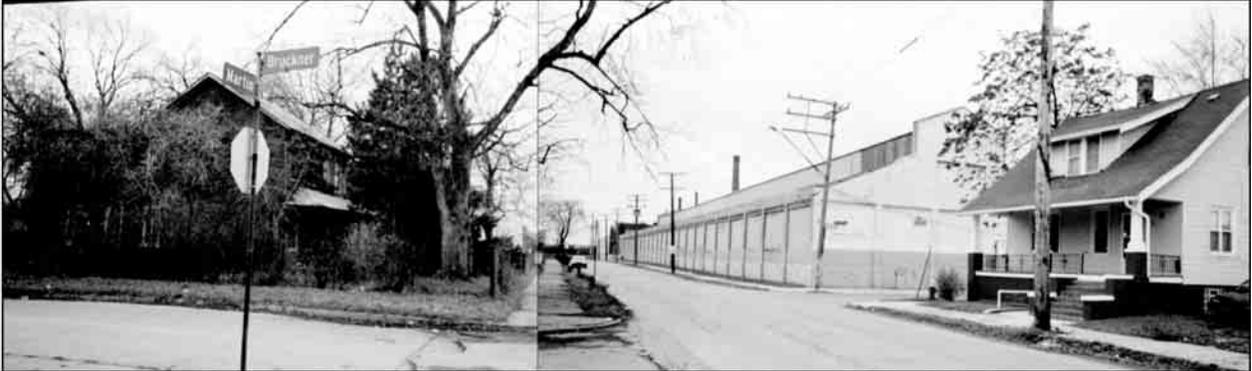
Brick dwellings within the project vicinity area exceedingly rare for all periods. During the pre-1920 period, the use of common brick was largely restricted to commercial buildings along Michigan and Livernois avenues and to foundation wall or pier supports for area housing.

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

### **Tomms House 3434 Martin Avenue, Detroit**

This Italianate brick dwelling (ca. 1875) exhibits a modern wood frame two-story rear addition and an offset, enclosed front porch entry made of brick. Side bays are simple elliptical arch forms. The window bays on the front façade exhibit corbelled surrounds with stone ornamentation. Twin corbelled belt courses on the first and second floors run across the front of the building from the corners to window surrounds. All windows and doors appear to be replacements (Figure 6-3).

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



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



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

Source: CCRG

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

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

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

## **Michigan Central Railroad Bridge Deck at the Passenger Station Complex 2405 West Vernor Highway, Detroit**

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

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

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

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

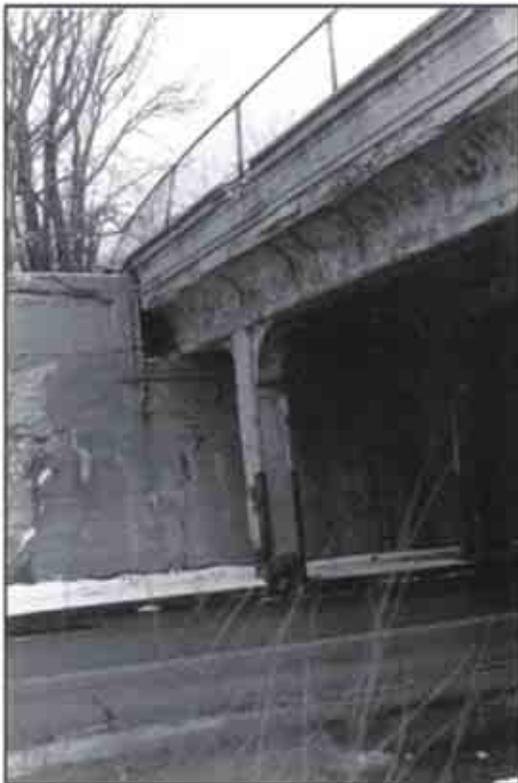
The north facade of the deck attaches to the rear (south) wing of the passenger terminal. This element of the cargo facility exhibits a Flemish bond brick veneer with the parapet exhibiting limestone block coping and a bed mold pattern cornice. A hanging metal shed roof awning extends along its entire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



West Vernor Bridge, View to North.



Bridge-Deck Construction Detail.



Bridge Parapet (South) Detail, View to West.

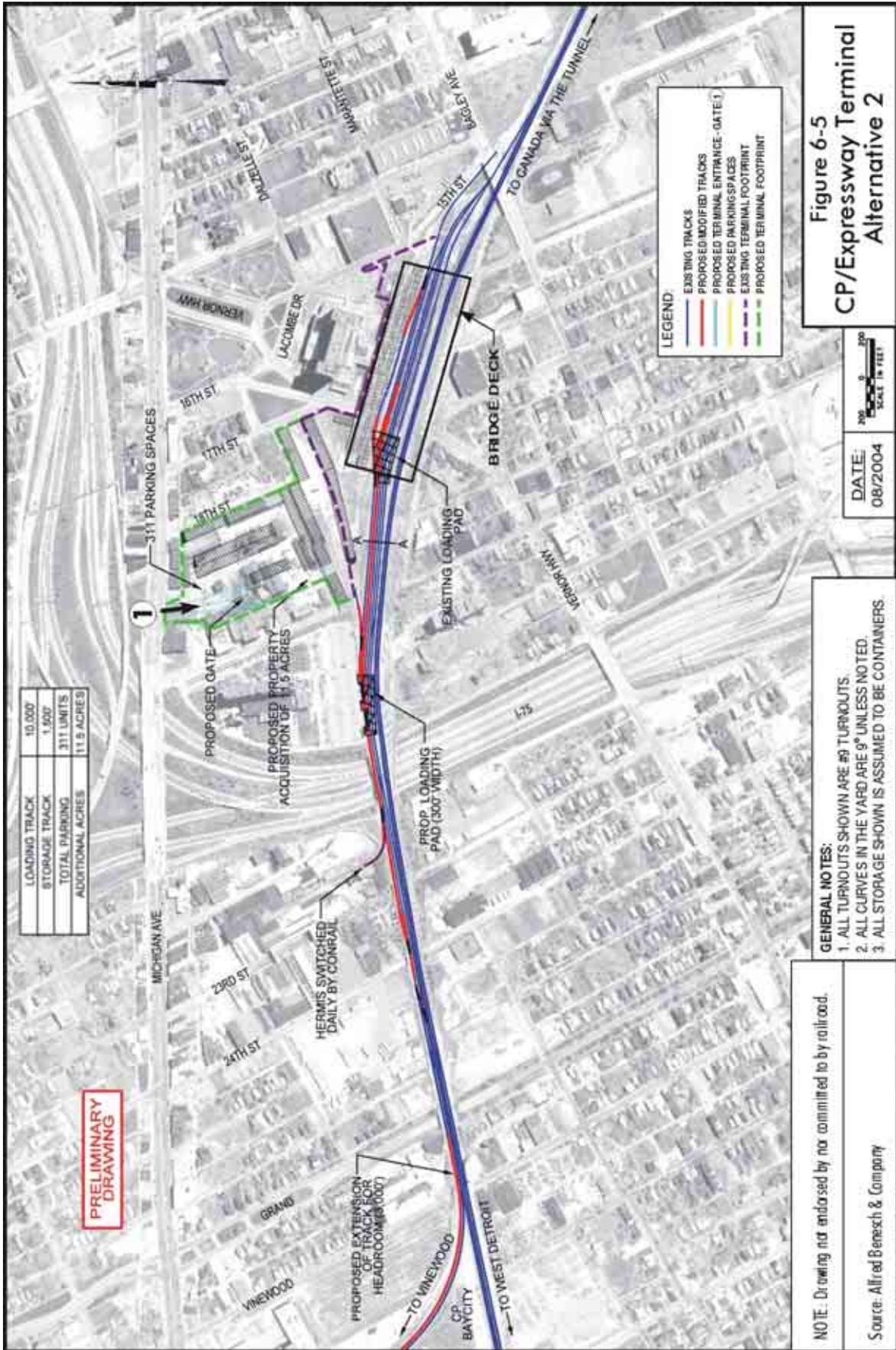


Deck Facade (South), View to East.

Figure 6-4  
Michigan Central  
Railroad Bridge Deck

SOURCE: CCRG

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

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

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

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

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

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

### **6.3.2 Recreational Resources**

#### **Michigan State Fairgrounds Woodward Avenue and Eight Mile Road, Detroit**

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

The easterly third of the Fairgrounds, adjacent to the railroad, is a fenced gravel parking and storage area designated on the current Michigan State Fairgrounds and Exhibition Center site plan as the "Railroad Lot" (Figure 6-6). This parcel adjoins the existing CN/Moterm railroad yard to the north of Eight Mile/Base Line Road (M-102). It is within the east half of this lot, adjacent to the existing railroad right-of-way, that the CN/Moterm yard has been proposed to expand approximately 35 acres as an alternative to the facility's expansion in the City of Ferndale. See Figures 4-10d and 4-53 for its location relative to Alternatives 2 and 4. This area is used for parking during the Michigan State Fair which is a period of up to 14 days in August of each year.

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

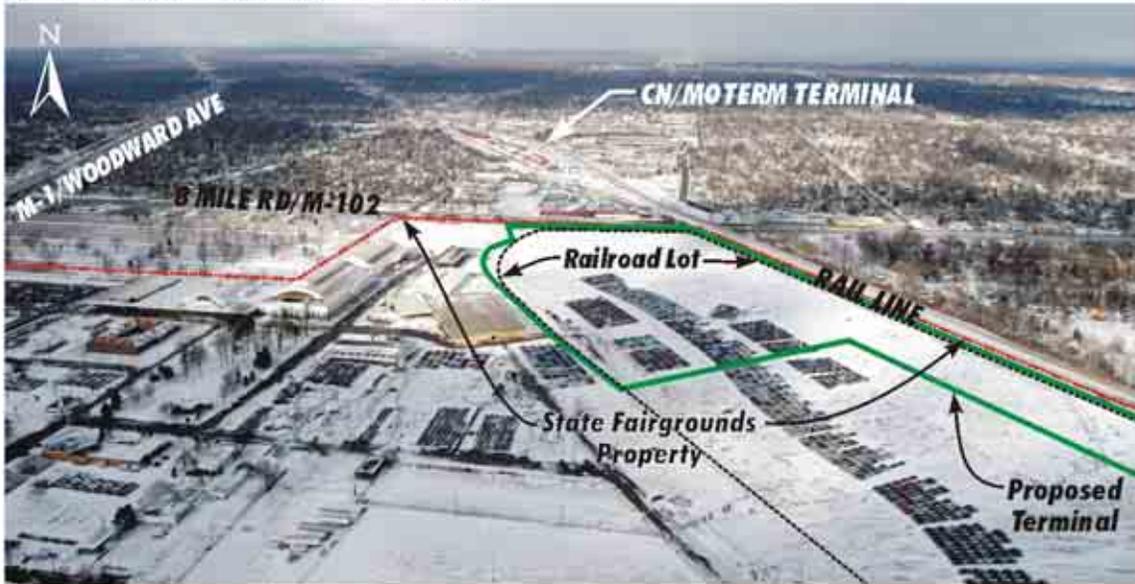
There is a history of railroad use of the Fairgrounds under lease agreement, and the bridge remains in place on railroad property to resume such use. Today, land on the east side of the Fairgrounds is used through a lease agreement to store new automotive vehicles before they are shipped to their final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

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

The properties discussed above are expected to experience adverse effects with the project. The properties and potential adverse effects are summarized in Table 6-1.

Alternative 2, Improve/Expand the CP/Expressway terminal would add and modify tracks on the Bridge Deck at the Michigan Central Railroad passenger station complex at the CP/Expressway intermodal terminal. The addition and modification of tracks at this site is considered an adverse effect. The SHPO concurred this would be an adverse effect (see letter dated October 18, 2004 in Appendix A).

Aerial view of Auto Storage at the State Fairgrounds



Ground view of Auto Storage at the State Fairgrounds



SOURCE: The Carradino Group of Michigan, Inc.

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Figure 6-6  
Michigan State Fairgrounds

Alternative 3: Consolidating all intermodal activity at the Livernois-Junction Yard and Alternative 4: the Composite Alternative of consolidating intermodal activity of three railroads at the Livernois-Junction Yard and expanding the CN/Moterm terminal would both require the total removal of the Michigan Box Company/Spranger Wire Wheel Corporation site for the expansion of the Livernois-Junction Yard. The total removal of buildings at this site is considered an adverse effect. The SHPO concurred this would be an adverse effect (see letter dated October 18, 2004 in Appendix A).

Alternative 3: Consolidating all intermodal activity at the Livernois-Junction Yard would require the total removal of the Federal Screw Works Factory for the expansion of the Livernois-Junction Yard. The total removal of this factory is considered an adverse effect on these three properties: the Federal Screw Works Factory, the Markey House (adverse visual effect), and the Tomms House (adverse visual effect). The SHPO states this would be an adverse effect (see letter dated January 21, 2005 in Appendix A).

Alternative 2 and Alternative 4 would require approximately 35 acres of Michigan State Fairgrounds (MSF) property. The taking of this area at this site is considered an adverse effect.

## **6.5 Avoidance Alternatives**

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

### **6.5.1 Historic Properties**

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

All feasible and practical alternatives have been carried forward for detailed study in this DEIS. Alternatives which clearly do not address the project purpose and need, described below, were eliminated from future consideration.

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

Since the 1980s, railroads have consolidated their intermodal service networks into fewer, larger hub terminals as they saw an opportunity to consolidate enough volume in one location to justify lift machines and other expensive equipment/facilities. Small facilities have been eliminated. For example, the activity at the smaller Norfolk Southern intermodal terminal at Oakwood has been shifted/consolidated at the Livernois-Junction Yard. This location, and others in the region like at

Highland Park, do not lend themselves to productive intermodal operations. Nevertheless, an existing terminal like Melvindale, and even Willow Run, may be used for some time into the future, if adequate capacity is not available on a timely basis at the Livernois-Junction Yard. But, even if these Class I railroad terminals stay in use indefinitely, their capacity, when added to that of the four intermodal terminals most likely to continue, does not address the demand expected in the future.

The August, 1994 Mercer Report<sup>2</sup> identified the CN/Highland Park terminal as one of two alternatives that warranted further investigation for a consolidated terminal (the Livernois-Junction Yard was the other alternative identified at that time). The Mercer Report and subsequent research has found the Highland Park site is not a viable intermodal terminal option for CN because:

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

It is also not a viable option for CSX, NS and CP or for consolidation of the intermodal activity of all four railroads for the above-stated reasons, plus:

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

### **Greenfield Site**

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

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

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

The earlier studies in 1993/1994 conducted for MDOT by Mercer Consulting examined possible “greenfield” sites. One, Willow Run, while having several attributes, was served by only a single

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<sup>2</sup> Greater Detroit Area Intermodal Study, Phase II – Intermodal Transportation Center Concept, Mercer Management Consulting, August 1994.

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

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

### **CBRA Alternative**

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

### **6.5.2 Recreational Properties**

Several alternatives, described below, were studied to expand the CN/Moterm terminal without using any of the Michigan State Fairgrounds. None of these were found to be feasible and prudent.

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

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

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

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

Expansion to the west of the existing CN/Moterm terminal would require relocation of approximately seven businesses, 60 single-family residences, and a large above-ground storage tank. This includes for construction of a perimeter road along the outside of the railroad fence that would provide north-south connectivity within the remaining neighborhood. It accounts for

placement of a barrier wall for terminal security and noise reduction purposes. Any additional buffering would require acquisition of more residences and possibly businesses. It is presumed the gate would remain in its present location. Presently Fair Park provides some buffering to the community. This park would also be acquired by an expansion to the west. This would be a 4(f) impact.

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

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

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

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

## **6.6 Measures to Minimize Harm**

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

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

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

### **6.6.2 Federal Screw Works Factory**

At the outset of the project the concept for intermodal consolidation in the area of the Livernois-Junction Yard called for acquisition of 700 to 800 acres north of John Kronk. Analysis reduced

this to 384 acres for Alternative 3, which would consolidate all four major railroads at the Livernois-Junction Yard. But, even with this minimized acquisition area, the Federal Screw Works Factory is required to meet the future intermodal capacity needs.

### **6.6.3 Markey House**

At the outset of the project the concept for intermodal consolidation in the area of the Livernois-Junction Yard called for acquisition of 700 to 800 acres north of John Kronk. Analysis reduced this to 384 acres for Alternative 3, which would consolidate all four major railroads at the Livernois-Junction Yard. With this minimized acquisition area, the Markey House is not required. However, the demolition of the Federal Screw Works Factory across the street would still result in an adverse visual effect.

### **6.6.4 Tomms House**

At the outset of the project the concept for intermodal consolidation in the area of the Livernois-Junction Yard called for acquisition of 700 to 800 acres north of John Kronk. Analysis reduced this to 384 acres for Alternative 3, which would consolidate all four major railroads at the Livernois-Junction Yard. With this minimized acquisition area, the Tomms House is not required. However, the demolition of the Federal Screw Works Factory across the street would still result in an adverse visual effect.

### **6.6.5 Michigan Central Railroad Bridge Deck**

Alternative 2 Improve/Expand the existing terminal at CP/Expressway would adversely affect the Michigan Central Railroad Bridge Deck because railroad tracks would be added on it. The bridge deck is part of the existing intermodal terminal at CP/Expressway. Minimizing the acquisition areas required for an improved/expanded terminal would still require alteration of the bridge deck.

### **6.6.6 Michigan State Fairgrounds**

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

In an effort to minimize impacts, the area for expansion of the CN/Moterm terminal has been reduced to approximately 35 acres from 50 acres. Coordination has occurred with the Fairgrounds management on where to place the terminal expansion, how to design the terminal, and on how to mitigate impacts in a way that is sensitive to the Fairground’s needs, including replacement parking needed during the annual State Fair. Consultations will continue with the official with jurisdiction over the Fairgrounds to determine necessary agreements to use the Fairgrounds.

## 6.7 Coordination

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

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

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

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

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

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

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

As part of the National Environmental Policy Act public involvement process, MDOT will continue to seek input concerning potential impacts and mitigation choices.

A public hearing will be held after publication and distribution of the Draft EIS/Draft Section 4(f) Evaluation. The public hearing will provide an overview of the study and allow participants the opportunity to comment either on a comment form or to a court reporter. This document is being distributed to the appropriate federal, state, and local agencies, and will be made available for public review and comment for 60 days after the public hearing.



# **SECTION 7**

## **EARLY COORDINATION AND PUBLIC MEETINGS**

### **7.1 Early Coordination**

Scoping meetings were held September 19, 2002 and June 4, 2003 in Detroit for agencies and local entities. Prior to the meeting a scoping packet was mailed to those invited. A listing of those invited, those who attended and those who responded to scoping materials is found in Appendix A. Pertinent correspondence received by MDOT is also included in Appendix A, as are minutes of the scoping meetings.

Comments received from federal and state agencies in response to early coordination are listed below.

#### **7.1.1 Federal Agencies**

- Department of Army, Corps of Engineers – stated, “As a result of the transfer of a portion of the Corps’ regulatory responsibilities to the Michigan Department of Environmental Quality (MDEQ), this site is no longer in the Corps’ jurisdiction. Therefore, we recommend that you contact Ms. Peg Bostwick, Lake and Stream Protection Unit, Land and Water Management Division, MDEQ for a determination of State permit requirements.”

#### **7.1.2 State Agencies**

- Michigan Department of Natural Resources, Wildlife Division – noted, “There are no known occurrences of federal- or state-listed endangered, threatened, or otherwise significant species, natural plant communities, or natural features at the locations specified.”
- Michigan Department of Agriculture – noted, “Since the construction of the proposed Detroit Intermodal Freight Terminal Project is to be accomplished within a highly developed part of the state, no adverse impacts to agriculture are anticipated.”

### **7.2 Public Meetings**

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

- July 11, 2002 – LASED Youth Center. (Total attendance 50.) Purpose: To introduce the Environmental Impact Statement process.
- August 15, 2002 – DIFT Information Office, 2722 Livernois Avenue. (Total attendance 20). Purpose: To discuss how to improve the appearance of the west side of Livernois Avenue at the yard entrance. Open May 2002 to May 2003.

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

Two scoping meetings were conducted – September 19, 2002 and June 4, 2003. The first scoping meeting included a bus tour of the area around the Livernois-Junction Yard/CP Expressway terminal. The second scoping meeting was held after the number of alternatives increased to include the improving/expanding existing intermodal terminals in addition to the No Action and Consolidate options. Each scoping meeting included a public comment period.

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

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

### **7.2.1 Interview Process**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Source: The Corradino Group of Michigan, Inc.

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

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

Source: The Corradino Group of Michigan, Inc.

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

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

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

### **Other Organizations**

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

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

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

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

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

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

Source: The Corradino Group of Michigan, Inc.

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

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

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

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

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

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

Source: The Corradino Group of Michigan, Inc.



## SECTION 8

# LIST OF PREPARERS

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## **SECTION 9**

# **DISTRIBUTION LIST**

The following is a list of agencies, organizations, persons and organizations to whom this document has been sent:

### **Federal Agencies**

Environmental Protection Agency, Administrator, Washington, D.C. Environmental Protection Agency, Region V  
U.S. Department of Agriculture, Natural Resource Conservation Service  
U.S. Department of Commerce, Environmental Affairs  
U.S. Department of Housing and Urban Development, Area Director  
U.S. Department of the Interior  
U.S. Department of Transportation, Assistant Secretary for Policy and International Affairs (P-1)  
U.S. Department of Energy, Washington Office  
U.S. Department of Health and Human Services, Center for Disease Control and Prevention, National Center for Environmental Health  
U.S. Army, Corps of Engineers  
Federal Emergency Management Agency  
Federal Aviation Administration  
Federal Transit Administration  
Federal Railroad Administration

### **State Agencies**

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

### **Local Jurisdictions and Agencies**

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

Oakland County Road Commission  
Wayne County Executive  
Wayne County Commission  
Wayne County Road Commission  
State Senator Hansen Clarke, District 1  
State Senator Irma Clark-Coleman, District 3  
State Senator Samuel Thomas, III, District 4  
State Senator Burton Leland, District 5  
State Senator Gilda Jacobs, District 14  
State Representative Marsha Cheeks, District 6  
State Representative Gabe Leland, District 10  
State Representative Steve Tobocman, District 12  
State Representative Gino Polidori, District 15  
State Representative Andy Meisner, District 27  
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U.S. Representative Carolyn Cheeks Kilpatrick  
U.S. Representative John Conyers, Jr.  
U.S. Representative Sander Levin  
U.S. Representative John Dingell

**Other**

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

**Appendix A**  
**Scoping Meetings and Correspondence**

**Section 1**  
**List of Those Invited to Scoping Meetings**

**Section 2**  
**Correspondence Received in Response to Scoping**

**Section 3**  
**Notes of Scoping Meetings**



## **Appendix A- Section 1**

### **List of Those Invited to Scoping Meetings**



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Hon. Bruce Patterson  
State Senator District 7

Hon. Robert Porter  
Mayor  
City of Ferndale

Hon. Triette Reeves  
State Representative District 10

Hon. Debbie Stabenow  
U.S. Senator

Hon. Samuel Thomas, III  
State Senator District 4

Hon. Steve Tobocman  
State Representative District 12

Hon. Gary Woronchak  
State Representative

## **OTHER AGENCIES**

Mr. Keith G. Harrison  
Executive Director  
Michigan Environmental Science Board

Mr. Sam Washington  
Executive Director  
Michigan United Conservation Clubs, Inc.

Ms. Cyndi Roper  
Clean Water Action

Ms. Anne Woiwode  
Director  
Sierra Club  
Mackinac Chapter

Mr. Conan Smith  
Land Programs Director  
Michigan Environmental Council

## **Appendix A- Section 2**

### **Correspondence Received in Response to Scoping**

1. September 9, 2002 - Ziibiwing Cultural Society, The Saginaw Chippewa Indian Tribe
2. September 13, 2002 – Michigan Department of Natural Resources, Wildlife Division
3. September 18, 2002 – Michigan Department of Agriculture
4. October 2, 2002 – US Department of the Army, Corps of Engineers
5. September 9, 2003 – Michigan State Fair
6. September 19, 2003 – Michigan Department of Natural Resources, Wildlife Division
7. October 18, 2004 – State Historic Preservation Office
8. November 22, 2004 – State Historic Preservation Office
9. January 4, 2005 – Michigan State Fair
10. January 21, 2005 – State Historic Preservation Office





## ZIIBIWING CULTURAL SOCIETY

THE SAGINAW CHIPPEWA INDIAN TRIBE

6870 E. BROADWAY MT. PLEASANT, MICHIGAN 48858

September 9, 2002

Mohammed Alghurabi,  
Michigan Department of Transportation  
Murray D. Van Wagoner Building  
P.O. Box 30050  
Lansing, Michigan 48909

Re: Scoping Meeting for proposed Detroit Intermodal Freight Terminal Project

Dear Mohammed Alghurabi:

This letter is in response to the invitation to the planned scoping meeting for the proposed Detroit Intermodal Freight Terminal Project.

At this time we do not have any information concerning the presence of any Indian Traditional Cultural Properties, Sacred Sites, or other Significant Properties to the projected project area(s). This is not to say that such a site may not exist, just that this office does not have any available information of the area(s) at this time.

This office would be willing to assist if in the future or during the construction there is an inadvertent discovery of Native American human remains or burial objects. I have enclosed an Informational Letter and a Site Reference Form this office uses when such an instance occurs. Feel free to call my office if you have any questions or requests at 989-775-4121.

We thank you for including this Tribe in your plans.

Sincerely,

Kayle Crampton  
Historic Preservation Coordinator

Enclosures: Informational Letter  
Site Reference Form

(989) 775-4750 • (989) 775-4751 • FAX: (989) 775-4770 • (800) 225-8172, Ext. 4750



JOHN ENGLER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF NATURAL RESOURCES  
LANSING

K. L. COOL  
DIRECTOR

September 13, 2002

Mr. Mohammed Alghurabi  
Michigan Department of Transportation  
P.O. Box 30050  
Lansing, MI 48909

**RE: Proposed Detroit Intermodal Freight Terminal Project**

Dear Mr. Alghurabi:

The location of the proposed project was checked against known localities for rare natural features. Unique natural features are recorded in a statewide database. This continuously updated database is a comprehensive source of existing data on Michigan's endangered, threatened, or otherwise significant plant and animal species, natural plant communities, and other natural features. Records in the database indicate that a qualified observer has documented the presence of special natural features at a site. The absence of records in the database for a particular site may mean that the site has not been surveyed. Records are not always up-to-date and may require verification. In some cases, the only way to obtain a definitive statement on the status of natural features is to have a competent biologist perform a complete field survey.

Under Act 451 of 1994, the Natural Resources and Environmental Protection Act, Part 365, Endangered Species Protection, "a person shall not take, possess, transport, ...fish, plants, and wildlife indigenous to the state and determined to be endangered or threatened," unless first receiving an Endangered Species Permit from the Department of Natural Resources, Wildlife Division. *Responsibility to protect endangered and threatened species is not limited to the list below. Other species may be present that have not been recorded in the database.*

The presence of threatened or endangered species does not preclude activities or development, but may require alterations in the project plan. Special concern species are not protected under endangered species legislation, but recommendations regarding their protection may be provided. Protection of special concern species will help prevent them from declining to the point of being listed as threatened or endangered in the future.

If the project is located on or adjacent to wetlands, inland lakes, or streams, additional permits may be required. Contact the Michigan Department of Environmental Quality, Land and Water Management Division, P.O. Box 30473, Lansing, MI 48909 (517-373-1170).

The following is a summary of the results for the project in Wayne County, T2S R11E, Sections 14 and 17:

There are no known occurrences of federal- or state-listed endangered, threatened, or otherwise significant species, natural plant communities, or natural features at the location(s) specified.

Thank you for your advance coordination in addressing the protection of Michigan's natural resource heritage. Responses and correspondence can be sent to: Michigan Department of Natural Resources, Wildlife Division – Natural Heritage Program, PO Box 30180, Lansing, MI 48909. If you have further questions, please call Ms. Lori Sargent, Natural Heritage Program Specialist, in the Wildlife Division at 517-373-1263.

Sincerely,

George E. Burgoyne, Jr.  
Resource Management Deputy  
517-373-0046

cc: Mr. Douglas Erickson, DNR Wildlife Division



STATE OF MICHIGAN  
DEPARTMENT OF AGRICULTURE  
LANSING

JOHN ENGLER  
GOVERNOR

DAN WYANT  
DIRECTOR

September 18, 2002

Mohammed Alghurabi  
MDOT  
425 West Ottawa Street  
P.O. Box 30050  
Lansing, Michigan 48909

Dear Mr. Alghurabi:

Thank you for the opportunity to comment on this preliminary phase of the planning and environmental study the proposed Detroit Intermodal Freight Terminal Project in Wayne County.

Since the construction of the proposed Detroit Intermodal Freight Terminal Project is to be accomplished within a highly developed part of the state, no adverse impacts to agriculture are anticipated. However, as your environmental review progresses, we ask that you contact Mr. James Abron, Wayne County Drain Commissioner (phone: 313-967-3800), in order to avoid adverse impacts to established county and inter-county drainage systems.

Again, thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Dan Wyant". The signature is written in a cursive style with a large initial "D".

Dan Wyant  
Director



**DEPARTMENT OF THE ARMY**  
DETROIT DISTRICT, CORPS OF ENGINEERS  
BOX 1027  
DETROIT, MICHIGAN 48231-1027

October 2, 2002

IN REPLY REFER TO

Engineering & Technical Services  
Regulatory Office  
File No. 02-282-001-0

Mohammed Alghurabi  
Michigan Department of Transportation  
Murray D. VanWagoner Building  
P.O. Box 30050  
Lansing, Michigan 48909

Dear Mr. Alghurabi:

This is in response to your recent correspondence regarding Department of the Army jurisdiction on the proposed Detroit Intermodal Freight Terminal Project in Detroit, Michigan (T2S, R11E).

As a result of the transfer of a portion of the Corps' regulatory responsibilities to the Michigan Department of Environmental Quality (MDEQ), this site is no longer within the Corps' jurisdiction. Therefore, we recommend that you contact Ms. Peg Bostwick, Lake and Stream Protection Unit, Land and Water Management Division, MDEQ, P.O. Box 30458, Lansing, Michigan, 48909, (517) 335-3470, for a determination of State permit requirements.

If you have any questions please contact Nathan T. Schulz at the above address or telephone (313) 226-5382. Please refer to File Number: 02-282-001-0.

Sincerely,

A handwritten signature in black ink that reads "Mary C Anderson".

Robert M. Tucker  
Chief, Enforcement Branch  
Regulatory Office

Jennifer M. Granholm  
Governor



John C. Hertel  
General Manager

September 9, 2003

Mohammed Alghurabi, PE  
Michigan Department of Transportation  
Murray D. Van Wagoner Building  
P.O. Box 30050  
Lansing, MI 48909

Dear Mr. Alghurabi:

One of the three major goals in our mission statement at the Michigan State Fairgrounds is to provide recreational opportunities along with those that are educational and entertaining.

If I can provide you any further information, please do not hesitate to contact me.

Sincerely,



JOHN C. HERTEL  
General Manager

Michigan State Fairgrounds and Exposition Center - 1120 W. State Fair Ave - Detroit, MI 48203  
Phone (313) 369-8250 Fax (313) 369-8410 - [www.michiganstatefair.com](http://www.michiganstatefair.com)



STATE OF MICHIGAN

DEPARTMENT OF NATURAL RESOURCES

LANSING

September 19, 2003

JENNIFER M. GRANHOLM  
GOVERNOR

K. L. COOL  
DIRECTOR

Mr. Richard Ray  
The Corradino Group  
200 S. Fifth Street  
Louisville, KY 40202

RE: **Detroit Intermodal Freight Terminal Project**

Dear Mr. Ray:

The location of the proposed project was checked against known localities for rare species and unique natural features, which are recorded in a statewide database. This continuously updated database is a comprehensive source of existing data on Michigan's endangered, threatened, or otherwise significant plant and animal species, natural plant communities, and other natural features. Records in the database indicate that a qualified observer has documented the presence of special natural features at a site. The absence of records in the database for a particular site may mean that the site has not been surveyed. Records are not always up-to-date, and may require verification. In some cases, the only way to obtain a definitive statement on the status of natural features is to have a competent biologist perform a complete field survey.

Under Act 451 of 1994, the Natural Resources and Environmental Protection Act, Part 365, Endangered Species Protection, "a person shall not take, possess, transport, ...fish, plants, and wildlife indigenous to the state and determined to be endangered or threatened," unless first receiving an Endangered Species Permit from the Department of Natural Resources, Wildlife Division. *Responsibility to protect endangered and threatened species is not limited to the list below. Other species may be present that have not been recorded in the database.*

The presence of threatened or endangered species does not preclude activities or development, but may require alterations in the project plan. Special concern species are not protected under endangered species legislation, but recommendations regarding their protection may be provided. Protection of special concern species will help prevent them from declining to the point of being listed as threatened or endangered in the future.

The following is a summary of the results for the project in Wayne County, Detroit:

- The Expressway site in T2S R11E section 13 and T2S R12E section 18
- The Oak site in T1S R10E section 26
- The Moterm site in T1N R11E section 35 and T1S R11E section 2

The project should have no impact on rare or unique natural features at the location specified above if it proceeds according to the plans provided. Please contact me for an evaluation if the project plans are changed.

Thank you in advance for your coordination in addressing the protection of Michigan's natural resource heritage. Responses and correspondence can be sent to: Michigan Department of Natural Resources, Wildlife Division – Natural Heritage Program, PO Box 30180, Lansing, MI 48909. If you have further questions, please call me at 517-373-1263.

Sincerely,

Lori G. Sargent  
Endangered Species Specialist  
Wildlife Division

LGS:jao

STEVENS T. MASON BUILDING • P.O. BOX 30028 • LANSING, MICHIGAN 48909-7528  
www.michigan.gov • (517) 373-2329



JENNIFER GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF HISTORY, ARTS AND LIBRARIES  
LANSING

DR WILLIAM ANDERSON  
DIRECTOR

October 18, 2004

LLOYD BALDWIN  
MICHIGAN DEPARTMENT OF TRANSPORTATION  
425 WEST OTTAWA  
PO BOX 30050  
LANSING MI 48909

RE ER-02-360 Draft Environmental Impact Statement, Above-Ground Resources Assessments,  
Detroit Intermodal Freight Terminal (DIFT) Project, Detroit, Wayne County  
(FHWA)

Dear Mr Baldwin,

Under the authority of Section 106 of the National Historic Preservation Act of 1966, as amended, we have reviewed the Above-Ground Resources Assessments for the above-cited project and have the following comments

**I CP Expressway DIFT Site**

National register-eligible resources with the area of potential effects (APE)

- The former **Michigan Central Railroad Station** is listed in the national register

We concur with the report's conclusions that the following properties in the APE appear to meet the criteria for listing in the national register

- **Bridge/Deck structure associated with Michigan Central Railroad Station** that includes the former passenger baggage and U S Post Office sorting rooms, express shipping room, base for now-demolished train sheds, and bridged grade separation spanning Vernor Highway In our view, this entire structure is eligible for listing in the national register as part of the overall station complex and should have been nominated to the national register as a whole at the time the station building itself was listed We concur with the report's conclusions concerning the engineering significance of this structure
- **St Paul's Church Historic District.** We concur with the report's conclusion that this complex, comprising the former St Paul's German Evangelical Lutheran Church, School, and Parsonage appear national register-eligible under the Ethnic Heritage and Architecture contexts
- **U. S Post Office Roosevelt Park Annex.** The report provides no information on the building's precise function – it appears much larger than a typical neighborhood branch post office in Detroit We concur that this building appears national register-eligible under the theme of Architecture

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www.michigan.gov/hal

**Determination of potential effects on historic resources within the CP Expressway DIFT Site APE:**

We concur with the determination stated in the preliminary Section 4(f) report that the proposed adding of tracks to the Bridge/Deck structure at the Michigan Central Station will likely result in an adverse effect on the structure by causing alteration to its physical form. The project will have no effect on other national register-eligible or listed properties in this APE.

**II. CN Moterm DIFT Site**

We concur with the report's conclusions that the following properties at the Michigan State Fairgrounds appear eligible for the national register:

- **Exhibition Building Historic District**, including the already national register-listed Coliseum, Dairy Cattle, and Agriculture buildings plus the Poultry Building, Whitehall, and the open park south of the Coliseum
- **Band Shell**
- **Garland Stove**
- **Grant House**. We concur with the recommendation that this house may be eligible, despite its having been moved several times, because of its architectural importance as one of the few surviving early Detroit houses, and also support the recommendation that more thorough study of the building's physical evolution and integrity is needed before a final determination of eligibility can be made.

**Determination of potential effects on historic resources within the CN Moterm DIFT Site APE:**

The information currently presented is insufficient to enable us to evaluate the potential impact of this alternative on the identified historic resources. This component of the project, with its project area edge located near some of the fairground's historic resources, appears to possess the potential for adverse impacts on the fairground's historic resources through new construction, noise, and perhaps other impacts that we cannot identify as yet because of the lack of specific plans.

**III. CSX Livernois-Junction DIFT Site**

We concur with the report's conclusions that the following buildings and structures in this APE appear national register-eligible:

- **Livernois Avenue Railroad Bridge**. We concur with the report's conclusion that this bridge appears national register-eligible because of its Art Deco design that incorporates the keystone device symbolic of the Pennsylvania Railroad.
- **Springwells Nineteenth-century Brick Housing**. The report concludes that the twelve brick houses form a discontinuous district eligible for the national register because of their association with the important nearby brick industry. We do not concur that these properties together meet the definition of a single discontinuous district as set forth in page 6 in National Register Bulletin

15 These properties appear to us, rather, to constitute a thematic group. For a property within such a group to be eligible for the national register, it must meet the criteria on its own.

The houses at 4323 Martin and 4229, 4237, and 4311 Central possess direct associations with local brick-making families and because they are among the only surviving properties associated with that once important industry, they appear to be national-register eligible. The three Wolf family properties on Central appear to constitute a single small historic district or complex.

The house at 3505 Martin belonged to Michael Markey, whose brother, John, and nephew, Peter, were both brick-makers. The association seems direct enough that it can be inferred that Michael's house was likely built using local brick, so that it, too, can – as best we can determine today – be viewed as possessing a direct association with the local brick industry. For this reason we view this house as national-register eligible.

The original owner of the house at 6690 Michigan is listed as George Clippert, but the report does not explain whether this Clippert was *the* George Clippert associated with the various Clippert brickyards in the area. If so, the house appears eligible because of that association. In any event, this house appears national register-eligible as a notable example of Queen Anne architecture.

The remaining six properties possess no thus far documented association with the local brick industry. While it is likely that some or all of these buildings are constructed of the local brick, the lack of any specific evidence makes determining them national register-eligible on the basis on that association impossible. In our view, for any of them to be eligible for the national register, it would need to be on other grounds.

Four of the other six houses appear to meet the national register criteria under the theme of Architecture. They are:

- 6201-6207 Toledo and 6332 John Kronk. These houses appear national register-eligible in that, as the report indicates for 6332 John Kronk, brick examples of workers' housing from as early as their likely date of construction are rare.
- 3434 Martin. This house appears to meet the national register criteria because of its distinctive Panel Brick façade brickwork.
- 4000 Cicotte. This house appears national register-eligible as one of a relatively small number of surviving brick middle-class Queen Anne houses.

The available information about 3201 Livernois and 8724 Michigan does not support national register eligibility for these properties.

- **Mercier's Second Subdivision Historic District.** The significance of this proposed district as stated in page 6-26 of the report is that it is the only World War I period industrial working class neighborhood development in the project area. We would like to see some analysis of how unique or unusual as a development—all built during a brief period around World War I—this area is within the broader context of the city's southwest side.
- **Spranger Wire Wheel Corporation/Detroit Wire Wheel Corporation.** We concur with the report's conclusion that the original building associated with Spranger appears to meet the national register criteria because of its associations with Detroit's early auto industry. The stock warehouse building does not appear to be a contributing feature of the property.
- **Engine Company No. 37 Firehouse.** We concur with the report's conclusion that this building appears to meet the national register criteria.

- **Springfield Body Corporation/Rickenbacker Motor Company Factory.** We concur with the conclusion that the 1916, 1918, and 1921 buildings form a complex eligible for the national register due to their use for munitions manufacture during World War I and auto manufacturing by the Rickenbacker Motor Company until 1927. We cannot evaluate whether any of the post World War II additions possess significance at present and request information on the plant's use between 1927 and 1966, when the last addition was made, to enable us to form an opinion.
- **Clippert Brick Company Office Building.** We concur with the conclusion that this building appears national register-eligible as the only surviving component of the numerous brick plants that once existed in this area.
- **Southern Avenue Railroad Twin Warren Truss Bridges.** The views of the structures provided in the report and the description together do not provide enough descriptive information to enable us to form an opinion on eligibility. The description should provide at least rough dimensions of the structures' overall span lengths and the lengths between abutments and the piers that seem to be present and between the two piers in each structure. Are these piers original parts of the structures, so that the trusses never functioned as single spans crossing the space from abutment to abutment, or are they additions?

**Determination of potential effects:**

**Spranger/Detroit Wire Wheel.** Implementation of Alternatives 3 or 4 would result in an adverse effect by requiring demolition of this property.

**Rickenbacker Motor Company.** We will hold our comments until we have evaluated the significance of the post World War II additions. It seems to us that, whether or not any part of the building will be demolished, the analysis of the project's effect will require some discussion with the current property owner and or occupant regarding the impact of any property taking on their operations. If the project will take needed property and require the existing operation to vacate the national register-eligible part of the building, that would, in our view, constitute an adverse effect on the historic resource.

**Brick Houses.** Some of the eligible houses are located directly adjacent to the boundary of the DIFT project area. Lacking any information about what work will take place nearby within the project area and what will be done to avoid any adverse visual or other impacts, we see a potential for adverse visual, noise, and possibly other impacts on the brick houses directly adjacent to the project area. We request additional information on project plans as they become available to enable us to comment more fully.

**Mercier's Second Subdivision.** Like some of the brick houses, this area is located directly adjacent to the project area. Should this area prove national register-eligible, we will have the same concerns as noted above for the brick houses.

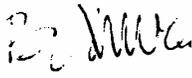
**Livernois Avenue Railroad Bridge, Engine Company No. 37 Firehouse, Clippert Brick Company Office Building, Brick Houses not directly adjacent/across the street from the project area, Southern Avenue Railroad Twin Warren Truss Bridges.** The project will have no adverse effect on these buildings and structures.

**IV. CP Oak DIFT Site:**

We concur with the report's conclusion that this APE contains no national register-eligible resources.

If you have any questions, please contact Brian Grennell, Environmental Review Specialist, at (517) 335-2721 or by email at [ER@michigan.gov](mailto:ER@michigan.gov). **Please reference our project number in all communication with this office regarding this undertaking.** Thank you for your cooperation.

Sincerely,



Brian D. Conway  
State Historic Preservation Officer

BDC:ROC:mmf



## STATE OF MICHIGAN

JENNIFER GRANHOLM  
GOVERNORDEPARTMENT OF HISTORY, ARTS AND LIBRARIES  
LANSINGDR. WILLIAM ANDERSON  
DIRECTOR

November 22, 2004

DR DAVID L RUGGLES  
DEPT OF TRANSPORTATION  
MURRAY D WAGONER BUILDING  
PO BOX 30050  
LANSING MI 48909RE: ER-02-360 Draft Archaeological Reports, Detroit Intermodal Freight Terminal Project,  
Wayne County

Dear Dr. Ruggles:

We have reviewed five reports associated with the above-cited project, all of which were prepared by Commonwealth Cultural Resources Group (CCRG). The five reports are:

1. *Archaeological Literature Search and Field Review of the Detroit Intermodal Freight Terminal (DIFT) Project, Detroit and Dearborn, Michigan;*
2. *Assessment of Archaeological Sensitivity for the Proposed CP Oak - Detroit Intermodal Freight Terminal, City of Detroit, Wayne County, Michigan;*
3. *Assessment of Archaeological Sensitivity for the Proposed CP Expressway - Detroit Intermodal Freight Terminal, City of Detroit, Wayne County, Michigan;*
4. *Assessment of Archaeological Sensitivity for the Proposed CN Moterm - Detroit Intermodal Freight Terminal, City of Detroit, Wayne County, Michigan; and,*
5. *Assessment of Archaeological Sensitivity for the Proposed CSX Livernois - Detroit Intermodal Freight Terminal, City of Detroit, Wayne County, Michigan.*

The reports discuss the archaeological potential of the various alternate terminal locations, and make recommendations regarding the need for further investigation of those locations in order to determine the presence or absence of archaeological deposits. CCRG recommends that no further investigation is necessary at the CP Oak, the CP Expressway, and the CN Moterm prospective terminal locations. The history of land use at these locations, particularly industrial development in recent decades, has disturbed and altered the landscape to the extent that there is little likelihood that intact archaeological deposits survive. We agree that no further investigation is warranted in these three areas.

The CSX Livernois location has been altered by industrial development as well. However, CCRG identifies two places within the CSX Livernois project area at which archaeological deposits may be present: the vicinity of site number 20WN1078, and the stockyard vicinity in the southwest portion of the railroad yard. While it may be that development has obliterated any archaeological remains in these areas, it has been our experience that it is not uncommon for archaeological deposits to survive even in developed, urban settings. Given that these areas were the locations of specific sites - the Jacque Baby Mill and the Michigan Central Stockyard Hotel - we agree that field investigation should be conducted of these two areas within the CSX Livernois project location to determine whether archaeological deposits are present.

From an editorial standpoint, we also want to note that in the report entitled *Archaeological Literature Search and Field Review of the Detroit Intermodal Freight Terminal (DIFT) Project, Detroit and*

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[www.michigan.gov/hal](http://www.michigan.gov/hal)

*Dearborn, Michigan*, Figure 1.0 is supposed to be a fold-out map, but in our copy of the report, the folded map was copied onto an 8 1/2" X 11" sheet of paper. Also, in the report entitled *Assessment of Archaeological Sensitivity for the Proposed CSX Livernois - Detroit Intermodal Freight Terminal, City of Detroit, Wayne County, Michigan*, page 5-3 ends with a parenthetical statement, but it does not continue on the following page. It appears that some text is missing.

If you have any questions, please contact Brian Grennell, Environmental Review Specialist, at (517) 335-2721 or by email at ER@michigan.gov. Please reference our project number in all communication with this office regarding this undertaking. Thank you for this opportunity to review and comment, and for your cooperation.

Sincerely,



Brian D. Conway  
State Historic Preservation Officer

BDC:DLA:bgg

Copy: Abdelmoez Abdalla, FHWA

## PURPOSES AND AIMS OF THE MICHIGAN STATE FAIR

In creating the Michigan State Fair Board of Managers in 1921, the Legislature stipulated the following:

"An annual state fair at the city of Detroit which shall have for the main purpose the exploiting and encouragement of improved methods in agricultural pursuits, is hereby authorized."

Despite its evolvement from a Board to a Commission to an Authority in the intervening years, the State Fair maintains the same main purpose, although its scope has broadened.

The objective of the Michigan State Fair is to serve as an educational and inspirational medium for all the people of Michigan in the creation of a mutual understanding of the problems and accomplishments of its rural and urban residents. Through this means, they will appreciate their interdependency and will work in the interests of each other and for the benefit of the State as a whole.

While holding steadfastly to the above purpose, the members of the Authority have additional aims designed to improve the Michigan State Fair. These are

1. To develop further a high caliber agricultural program through the means of greater premiums and improved facilities.
2. To develop a junior program embracing all phases of agriculture for all farm youth groups.
3. To develop a balanced industrial exhibition.
4. To develop and present a high level of diversified entertainment for children and adults from rural and metropolitan areas.
5. To develop an expanded year-round program for the Fairgrounds.
6. To redevelop the Fairgrounds so that the site will receive maximum utilization.
7. To make the Fairgrounds a recreational focal point for the Metropolitan Detroit area.



JENNIFER GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF HISTORY, ARTS AND LIBRARIES  
LANSING

DR. WILLIAM ANDERSON  
DIRECTOR

January 21, 2005

LLOYD BALDWIN  
MICHIGAN DEPARTMENT OF TRANSPORTATION  
425 WEST OTTAWA  
PO BOX 30050  
LANSING MI 48909

RE: ER-02-360      Draft Environmental Impact Statement, Above-Ground Resources Assessments,  
Detroit Intermodal Freight Terminal (DIFT) Project, Detroit, Wayne County  
(FHWA)

Dear Mr. Baldwin,

Under the authority of Section 106 of the National Historic Preservation Act of 1966, as amended, we have reviewed the additional information concerning historic properties in the DIFT sites, and we have the following comments:

**Michigan State Fairgrounds Properties:** In our opinion the project will have no effect on any of the properties identified as national register-eligible within the state fairgrounds property.

**Markey House, 3504 Martin:** Alternates 2 and 4 will result in No Adverse Effect on the property. Alternate 3 will result in the removal of the factory building directly across the street that has been a part of the house's environment for much of its existence and its replacement with a barrier wall. We see a strong potential for an Adverse Effect on the house by introducing a visual element out of keeping with the neighborhood character.

**House at 6332 John Kronk:** The proposed barrier wall directly across the street has the potential to result in an Adverse Effect on the house through its height, design, and placement. It seems possible to us that the concrete railroad embankment along the opposite site of John Kronk from the house may have some historic significance either on its own or perhaps as part of a larger railroad yard complex. Our understanding is that railroad properties have not been evaluated as part of this project. If the proposed barrier wall project may affect the concrete embankment, information concerning the embankment and related railroad engineering will be needed in order to complete an assessment of eligibility and effects.

**Tomms House, 3434 Martin:** Alternates 2 and 4 will result in No Adverse Effect on this property, but alternate 3, because of the removal of the factory, part of the house's historic visual environment, and the expansion of the railroad yard and construction of a barrier wall may result in an Adverse Effect on the house for the same reasons as noted above in relation to the Markey House.

**Mercier's Second Subdivision:** This area possesses an interesting early developmental history that is apparently unique at least in this section of Detroit, but we do not feel that this history by itself provides a compelling argument for national register eligibility. This neighborhood does not appear to us to meet the national register criteria.

**Springfield Body Corporation/Rickenbacker Motor Company Factory, 4815 Cabot:** The information presented suggests that the 1966 part of the building does not possess historic significance on

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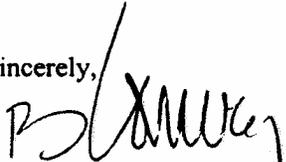
its own. In our view the removal of the 1966 section that would be required under Alternatives 3 and 4 would have No Adverse Effect on the historic part of the complex.

**Southern Avenue Railroad Twin Warren Truss Bridges:** These structures appear to meet the national register criteria. In our opinion the project will result in No Adverse Effect to them.

With regard to the draft Memorandum of Agreement (MOA) for the project, while we approve of the MOA in concept, as you indicated in your December 6, 2004 letter, we consider the current version only a basic framework for a more formal discussion and negotiation that will occur after more definite details of the project are worked out. However, in considering landscaping and site concerns (Section IV), we wish to see stipulations that will specifically address the design and siting of any barrier walls.

If you have any questions, please contact Martha MacFarlane Faes, Environmental Review Coordinator, at (517) 335-2721 or by email at ER@michigan.gov. **Please reference our project number in all communication with this office regarding this undertaking.** Thank you for this opportunity to review and comment, and for your cooperation.

Sincerely,



5

Brian D. Conway  
State Historic Preservation Officer

MMF:ROC:bgg

**Appendix A- Section 3**  
**Notes of Scoping Meetings**



Detroit Intermodal Freight Terminal Project  
Draft Notes  
Scoping Meeting  
September 19, 2002; 9:00 a.m.  
Latino Family Services Center

Background: This is a formal scoping meeting for the DIFT Project.

Attendance: See attachment.

Discussion:

The purpose of the meeting was to describe the project and its potential impacts and to solicit from those agencies contacted, and others who attended, responses to the purpose and need for the project, the project alternatives, and potential impacts. Resource agencies were invited, as were other organizations that might potentially have involvement with the project. Notification also was extended to those who have indicated an interest in the project, and/or are considered community leaders.

Ari Adler of MDOT began the meeting by asking those present to introduce themselves. Mr. Adler then turned the meeting over to Don Cameron of the Federal Highway Administration (FHWA) who used a PowerPoint presentation to discuss the National Environmental Policy Act (NEPA) and the Environmental Impact Statement (EIS) process. A hard copy of Don Cameron's PowerPoint presentation was distributed. In his remarks, he covered NEPA's objectives and the role of NEPA as an "umbrella" for a variety of federal laws, and regulations. He then discussed the EIS process: the study approach, notice of intent, purpose and need, scoping, draft EIS, public hearing, final EIS, and the Record of Decision (ROD). He noted that the purpose of today's meeting was scoping, which is designed to define a study area, develop a list of stakeholders, inventory and map known resources, identify socioeconomic and environmental constraints, identify preliminary alternatives, and initiate the public involvement and agency coordination process. Don then explained how an EIS is prepared and its components; how that leads to a public hearing; and, how the public hearing comments are addressed in the process of preparing the final EIS. The process is concluded with a Record of Decision, which is a written record explaining why the lead agency, in this case the Federal Highway Administration, has taken a particular course of action.

Ari Adler then asked Joe Corradino to explain the project purpose and need, a document which was distributed by mail to all resource agencies in advance of the September 19 meeting. Joe Corradino explained that the presence of the Livernois-Junction Yard area in Southwest Detroit could allow the consolidation there of a number of intermodal terminals in the region, several of which are experiencing capacity problems at their current locations. Consolidation at a single location is expected to improve the economic position of Southeast Michigan. Joe Corradino then played a videotape that explained the project. After the presentation, Ari Adler asked that those present offer their comments. These are presented below along with MDOT's response, where appropriate.

Comment: Frank Katarzis of The City of Dearborn indicated the City has no comments at the present time.

Comment: Alex Sanchez of the Michigan Department of Natural Resources: There are few streams and only one small wetland in the area and that avoidance should be considered with respect to that wetland.

Comment: Albert Richardson of the Detroit Fire Department: Concerned about traffic patterns.

Question: Unidentified speaker: What code would be used for the design of roads and what would be done to ensure proper use of the truck-only road?

Response: Within railroad property, the railroad would build to their own design needs and would control the use of the truck-only road. Outside the railroad property, it is likely the perimeter road would be a city street and built to meet city standards. Other improvements outside the terminal would be the state's responsibility and designed to meet state standards. Terminal access would be focused on the Livernois and Wyoming areas in such a way to encourage truck-only road use directly from those streets into the terminal. There may be a control device to limit areas to only DIFT vehicles.

Question: Harold Watkins of Detroit Environmental Management: Which railroads operate in the area? Will there be flow study of the numbers of trains and what they transport? Also, will there be access to the area for EMS?

Response: There will be a forecast of the number of trains. Emergency access will be addressed in the DEIS; roads built for the project must be accessible to emergency vehicles. The EIS will contain a plan to address spills of hazardous materials. And, the terminal's drainage system will be designed to contain runoff until it's appropriate to be released.

Comment: Mr. Gildon of the Detroit Fire Department: Keep in mind that all roads everywhere should be accessible by all of our emergency apparatus. That's what the Fire Department is going to require.

Question: Mark Merkey of Wayne County Department of Public Services: How roads under the jurisdictions of Wayne County would be handled. Were Dix or Wyoming going to be rebuilt as part of the project if increased truck traffic deteriorates them?

Response: Some improvements to these roads may be part of the project where the roads directly serve the DIFT.

Comment: Mr. Chbib of the Detroit Public School Systems: The truck-only road close to Beard School should be switched to the far side of the railroad tracks and that the existing fence be replaced. Also, he asked how to further comment on this project?

Response: A wall of some sort was being considered along the rail property near the Beard School. People can communicate issues on the project via the project's Web site, by letter, or at public meetings.

Question: Unidentified speaker: Asked about the time frame was for submitting comments.

Response: Comments were being accepted throughout the EIS process.

Comment: Mr. Palombo of SEMCOG indicated his agency had reviewed the project purpose and need and stated that, from SEMCOG's regional perspective, particular concerns were air quality, noise and truck traffic.

Comment: Ms. Lile of Detroit Department of Environmental Affairs: The Detroit Department of Environmental Affairs will touch base with each City agency and compile a City response. It will be submitted at a later point in time.

Response: It would be helpful if you submit your comments as soon as you can.

Comment: Officer Chris Braymon, Dearborn Police Department: Concerned for public safety.

At this point, having received comments from the agencies invited to the scoping meeting, comments from the general public were invited.

Comment: Father Reilly of St. Anne's Church: Dumping this project on the City mashes its people.

Comment: Ms. Milberg, area resident and member of Southwest Detroit Business Association: The project is not going to be helpful to the economics of the neighborhood.

Question: Ms. Gruelle of Southwest Detroit Environmental Vision: Creating a consolidated hazardous spill plan is productive. Asks if long periods of truck vibration cause destruction of buildings? Cites the Beard School concerns and stresses air pollution's effects on asthma, cancer, and heart disease, particularly in this sensitive area of Southwest Detroit.

Response: A study will be undertaken to determine the effect of truck vibrations. Air quality studies will also be conducted. Both direct and indirect effects of the project will be measured in a number of categories.

Comment: Unidentified speaker: The DIFT Project has to be considered in light of the Ambassador Bridge Project, the proposed Rail Truck Tunnel, an improved track connection that would facilitate AMTRAK use through the DIFT, and additional changes resulting from the breakup of Conrail.

Comment: Unidentified speaker: The Arab community is not being considered a minority group and should be.

Comment: Ms. Kavanaugh of Communities for a Better Rail Alternative: Our organization has offered an alternative that we should like fully evaluated in the EIS process. Our alternative has been mis-characterized in the past as the “No Action” alternative. Our alternative would provide for almost half of the forecasted demand.

Comment: Ms. Savoie of the Arab Community Center for Economic and Social Services indicated her group would submit written comments today. She indicated Ms. Gruelle’s comments cover concerns that are very strong in the community. Ms. Savoie cited a “glaring omission” of the Arab American Community’s presence in examining environmental justice issues in data that the DIFT project has presented to date. She noted the Arab-American community is not a federally recognized minority but is almost impossible to ignore in Michigan. She also indicated her organization believes MDOT is in violation of the NEPA Code, which requires full evaluation of all reasonable alternatives, including those that only partially meet the stated goal of the project, even those that are outside the scope of the agency's authority and that are not within the context of the finding currently available. She also noted it is repugnant to consider only No Action and one alternative. Ms. Savoie stressed her organization will submit case law to support these issues.

Response: The efforts of the DIFT Project Team to provide full information to the Arab Community were noted.

Comment: Ms. Wendler of the Southwest Detroit Business Association: Her organization is concerned about the loss of 99 businesses in MDOT's preferred alternative. She would like to know the number of jobs lost at these businesses along with the income tax loss. Urges the state not to respond to her concerns until it has the answers.

Comment: Mr. Slovic: Notes he’s seen no information concerning projects already in the pipeline that will affect DIFT at the Livernois-Junction Yard. Cites as examples the Detroit River Terminal Project and the West Detroit Connector in MDOT’s current budget for a \$500,000 improvement.

Response: The DIFT will account for other projects that are underway or planned.

Comment: Unidentified speaker: It is hard to analyze the No Action Alternative without the Federal Railroad Administration’s position on the disposition of Conrail assets.

Comment: Ms. Milberg: Allen Park is far from Southwest Detroit and indicates, “those population figures of white folks in that community were added (the DIFT reports) to kind of bump up the totals so that it would reduce by percentages the number of minorities that would be affected.”

Comment: Greg Warren: Indicates those who spoke from the area have very good concerns.

Comment: Ms. Rodriguez of Mexicantown Community Development Corporation: This is the only neighborhood in the entire City of Detroit that has had any significant growth in businesses and residents. Notes the upcoming construction of an international Welcome Center. Cites the reeling-effect of the construction of freeways in the late 1960s. Urges the need to work something out that is going to benefit everyone but, primarily, that doesn't destroy the neighborhood that many have worked so hard to reconstruct.

Comment: Mr. Christiansen of the Southwest Detroit Improvement Association, an area resident, and a City Planning Commissioner: Notes his very big disappointment at the number of community people in attendance and also business people or business representatives. Indicates honest answers on the proposed DIFT will require getting the word to some people that can give you some answers.

Response: This meeting is a process to gather together resource agencies. It's open to the public to allow further involvement to, at least observe and offer comments. There have been many more opportunities for the public to provide comments.

The meeting moved at 11:00 a.m. to a bus tour of the Livernois-Junction Yard area where the DIFT is proposed to be located.

Detroit Intermodal Freight Terminal Project

Scoping Meeting  
September 19, 2002; 9:00 a.m.  
Latino Family Services

Attendance

Name	Representing	Address	City	Zip	Telephone	E-mail
Fatima Aidibi	Corp. Translation Svcs.	26966 Rochelle	Dbn. Hts.	48127	313.792.1327	CorporationTranslation@msn.com
Heidi Alcock	CPC	202 CAYMC	Detroit	48226	224-3281	alcockh@cncl.ci.detroit.mi.us
Ken Anderson	SDBA		Detroit			kenz@umich.edu
Jamie Antonini	USDA-NRCS	446 N. Elizabeth	Marin City			
Gerri Ayers	MDOT/ENV	425 W. Ottawa	Lansing	48909	517.335.2635	
Gabrielle Bagnasco	DCX	800 Chrysler Dr.	Auburn Hills	48326	248.576.8729	
Bryon Botts		4065 Lawndale	Detroit	48210	313.846.7292	
William Bowman	NRCS	3001 Coolidge Rd.	East Lansing	48911	517.324.5241	
Chris Braymon	City of Dearborn	16099 Michigan	Dearborn	48126	313.943.2294	
Mahmoud Chbib	Det. Pub. Sch.	5057 Woodward, Suite 564	Detroit	48202	313.494.1842	
Tom Christiansen	LPC	2754 Casper	Detroit	48209	313.842.7304	Tom1936@msn.com
Marty Connour	MARS Ind.	3100 Lonyo	Detroit	48209	313.841.1800	
Jeff Edwards	MDOT Metro Reg.	18101 W. 9 Mile	Southfield	48075	248-483-5114	edwardsje@michigan.govvv
Doug Fishell	MDOT Real Estate		Lansing		517.373.2210	
Claryce Gibbons-Allen	DDOT	1301 E. Warren	Detroit	48207	833.7670	
Weylin Gildon	Fire Dept.	250 W. Larned	Detroit	48226	596-2907	
Greg Gorno	GTSJ/DIA	18673 Dix	B'town	48192	734.281.1666	greg@cornotrans
Chris Gulock	City Planning	202 Coleman A Young Ctr.	Detroit	48226	313.224.7888	
Alan Hayner	City of Detroit	65 Cad Tower	Detroit	48226	224.9033	ahayner@pdd.ci.det.mi.us
Robert Hedges	City of Dearborn	13015 Michigan	Dearborn	48126	313.943.2035	
Marc Higginbotham	Norfolk Southern	2000 Town Center, Ste. 1900	Southfield	48075	248.351.2670	
Frank Jackson	House Dem. Leader	3011 W. Grand Blvd, Ste. 1070	Detroit	48202	313.871.6985	redjax@aol.com
John James	JGI	4001 Fort St.	Detroit	48209	841.0070	
Reg Johnson	Det. Law	1650 First Nat'l	Detroit	48226	313.237.5065	
Jeff Jones	Det. Law	1650 First Nat'l	Detroit	48226	313.237.5065	
Frank Katarzis	City of Dearborn E&LD	13615 Michigan	Dearborn	48126	313.943.2180	fkatarzi@ci.dearborn.mi.us
K. Kavanaugh	SDBA	7752 W. Vernor	Detroit	48210	842.0986	
Bruce M. King	City of Detroit	660 Woodward	Detroit		313.471.5103	kingbm@env.afrs.ci.detroit.mi.us
Gay Lynn Kinter	NRCS	1525 N. Elms	Flint	45032	810.230.5766	
Sarah Lile	City of Detroit	1800 First Nat. Bldg.	Detroit	48226	313.471.5115	
Mark Merkey	Wayne County DPS	415 Clifford	Detroit		313.224.7272	mmerkey@co.wayne.mi.us
Kathy Milberg	Resident/SDBA	9152 Chamberlain	Detroit	48209	313.554.1850	

Name	Representing	Address	City	Zip	Telephone	E-mail
Carmine Palombo	SEMCOG					
Bob Parsons	MDOT		Lansing		517.335.2488	parsonsb@michigan.gov
Sherry Piacenti	MDOT	7050 W. Saginaw	Lansing	48917	517.321.5071	piacentis@michigan.gov
Joe Redican	LAC	5668 Baber	Detroit	48206	313.844.4443	joseredica@hotmail.com
Rev. A. Leo Reilly	St. Anne Parish	1000 St. Anne	Detroit	48216	964.5766	
Albert Richardson	D.F.D.	250 W. Larned	Detroit	48226	313.596.2922	
Jim Roach	AVT	991 Rosewood	E. Lansing	48823	517.351.8927	
Alex Romero	WC Sheriff	1231 St. Antoine	Detroit	48226	224.7103	aromero@co.wayne.mi.us
Alex Sanchez	DEQ	525 W. Allegan	Lansing	48909	517.335.3473	
Kathryn Savoie	ACCESS	6450 Maple St.	Dearborn	48126	313.554.0376	ksavoie@accesscommunity.org
Chuck Scott	Scott Cont. Service	POBox 10008	Detroit	48210	313.849.4553	chuckscott@scottcontainer.com
Chris Singer	Det. News				224.2127	
Paul Slaun	Scott Container	POBox 10008	Detroit	48210	313.523.9124	
Donald-Ray Smith	Detroit Planning	65 Cadillac, Suite 1300	Detroit	48226	313.224.1319	drsmith@pdl.ci.detroit.mi.us
Linda Vertin	City of Detroit	7140 W. Fort	Detroit	48210	596.5420	LLUL82@aol.com
Greg Warren						
Harold Watkins	Det. Env. Mgt.	250 W. Larned	Detroit	48226	313.596.5195	watkinsharold@dfdhg.ci.detroit.mi.us
K. Wandler	SDBA	7752 W. Vernor	Detroit	48209	842.0986	wandlerk@june.com
Marja Winters	Det. Plng. Comm.	202 CAYMC	Detroit	48226	313.224.6376	wintersm@cnci.ci.detroit.mi.us
Andy Zeigler	MDOT	18101 W. Nine Mile	Southfield	48075	248.483.5108	zeiglera@michigan.gov
Mona _____	MCDC	2620 _____	Detroit	48216	967.9898	

Detroit Intermodal Freight Terminal Project (DIFT)  
Scoping Meeting  
June 4, 2003, 10:00 a.m.  
Northwest Activities Center, Detroit

**Purpose:** This is the second part of the formal scoping meeting on the Detroit Intermodal Freight Terminal Project, the first part having been conducted on September 19, 2002. Its purpose is to familiarize agencies and those with permitting and regulatory authority about the purpose and need and alternatives for the DIFT Project and to familiarize those in attendance with the National Environmental Policy Act (NEPA)/Environmental Impact Statement (EIS) process.

**Attendance:** See attached list.

**Discussion:**

Welcome/Introductions

Mohammed Alghurabi opened the meeting and noted that a tour would be conducted directly following the scoping discussion. He also indicated Arabic and Spanish translators were available. He provided a brief introduction of the project and indicated Greg Johnson of the Michigan Department of Transportation (MDOT) would serve as moderator of the meeting. Mr. Johnson began by asking for introductions and by describing how the meeting would be conducted. He introduced Don Cameron of the Federal Highway Administration (FHWA) to provide an overview of the NEPA/EIS process.

NEPA/EIS Presentation

Mr. Cameron explained the NEPA/EIS process. He noted the role of public involvement; the alternatives and impacts covered by an EIS; the conduct of a public hearing on the Draft EIS; and, the preparation of the FEIS, including a recommended alternative and the Record of Decision. He then opened the floor to questions regarding his presentation.

NEPA/EIS Questions

**Question:** What is the timeline for the project?

**Response:** The Draft EIS is scheduled for completion in summer 2004. Within a year from then, the Record of Decision (ROD) should be complete.

**Q:** How does federal funding relate to the ROD?

R: The ROD is the last step in developing the Final EIS. Design of the project cannot begin until the Record of Decision is complete. The Record of Decision could result in doing nothing at all.

Q: Does NEPA require that all state and local regulations and rules be met?

R: Yes.

Q: Does the County have to sign off on the Record of Decision?

R: The first decision is made by MDOT. If MDOT does something without concurrence of what agencies think, that can sometimes create problems. I think in the Detroit area, the case we're looking for is concurrence of the major portion of the metropolitan area and once the individual city by itself is saying "we object", it may not be enough to cross it out.

### Project Overview

Joe Corradino provided background on the project, its purpose and need, and potential issues. He defined what intermodal is and the nature of its recent growth. He noted where the terminals are in Southeast Michigan today and are expected to be in the future and the capacity of each. He referred to earlier analyses conducted by another team and indicated that current demand is in line with the earlier forecasts. He then briefly described the DIFT alternatives, indicating that Alternative 1, No Action, has already had involvement with state money and this is the background situation. Alternative 2 was developed partly in response to comments by Communities for a Better Rail Alternative (CBRA) to expand/improve each existing terminal at its current site rather than consolidate at one site. Alternative 3 is the consolidation at one site and that place is the Livernois-Junction Yard.

Analysis of the existing Livernois-Junction Yard shows that although the site is large, it is cut by Central and Lonyo Avenues. It would be more effective if one of these streets would be closed and the other likely put under the rail platform.

CP/Expressway, which is located to the east of the Livernois-Junction Yard, is soon to experience a reduction in its space due to the cancellation of a lease. It could also be affected by a proposed conversion of two railroad tunnels to use by trucks and building a new rail tunnel under the Detroit River, which would emerge in the vicinity of the CP/Expressway terminal. Joe Corradino noted, however, that fitting the tunnels and the expanded CP/Expressway terminal in the area behind the MC Depot is problematic at this point.

Regarding the CP/Oak Yard, Joe Corradino noted it would likely be expanded to the north, if expansion occurred. The terminal is operated by CP but on property leased to it by CSX.

At the CP/Moterm terminal, expansion may go into the industrial area on the east or it may go south into the state fairgrounds.

Alternative 2 involves expanding existing terminals and would likely require acquisition of land at each location with the possible exception of Livernois-Junction Yard. Alternative 3 (Consolidation) would require right-of-way acquisition at Livernois-Junction Yard.

Joe Corradino stressed there are two important needs to be addressed by the project: capacity versus demand and connectivity. He reviewed analyses indicating that demand for intermodal services outstrips the ability of the capacity of the existing terminals. He noted that both the capacity and demand forecasts for each terminal were reviewed by representatives of the railroad operating the terminal. He noted the forecasts for 2025 in the DIFT Purpose and Need Statement were lower than earlier projections prepared by others. And, the new forecasts were presented in a range rather than a single number. The higher end of the range is consistent with growth trends provided by the Intermodal Association of North America and the American Trucking Association. The forecast at the low end of the range is based upon Reebie data, which show growth in intermodal traffic in Wayne County to 2010 at about 2.6 percent per year, compounded. That forecast was extended to 2025. Joe Corradino stressed that, regardless of the low or high end of the forecast range, the capacity of existing terminal facilities is exceeded by at least 75 percent. He also noted that even if the Triple Crown and Delray terminals continued to be used for intermodal business, the system of terminals would not have the capacity to meet the demand.

Joe Corradino noted other projects in the region, in terms of major infrastructure development, to which connections are needed to do a good job in moving intermodal freight.

Joe Corradino discussed a number of key issues related to the project, in particular economic impacts, environmental justice and air quality. On air quality, he noted that for the EIS, there would be a CO hot-spot analysis; ozone analysis, sufficient to determine conformity for the years 2015 and 2025; and, a qualitative assessment of air toxics. Economic impacts would be developed for the local area around each terminal, the rest of Wayne County and the rest of the region.

### Interaction

Representatives of groups that came to the meeting were asked to make comments. This was done by moving clockwise around the conference table set up for the meeting.

- Sherry Kamke of EPA had no comments at this time.
- Doug Topolski of the Dearborn Police Department expressed concern about traffic impacts on Michigan Avenue. Joe Corradino noted that an intersection analysis would be done indicating the level of service. This analysis would include existing (background) traffic and new intermodal truck traffic. The Dearborn representative also noted the issue of hazardous waste.
- Glenn Osowski of Congressman Conyers' office asked how the project was being coordinated with Homeland Security agencies due to the fact that the DIFT was located at an international border location. He also asked whether the new crossing itself was vital to the DIFT. Joe Corradino responded the DIFT Project Team had met with Wayne County and Detroit Homeland Security personnel. The DIFT Project is being coordinated with the Border Crossing study. And, while the location of a new crossing is now unknown, the DIFT was largely independent of border issues. Finally, Joe Corradino noted that coordination has also occurred within the Canadian Pacific study that is examining the use of the existing rail tunnels under the Detroit River for potential truck commerce.
- Colonel Lundy of the Michigan Department of Military Affairs had no comment at this time.
- Robert Sills, an MDEQ Air Quality Division representative, asked about the air quality analysis at the terminals which would have intermodal traffic moved if consolidation occurred. Joe Corradino responded that the analysis assumed that those terminals from which intermodal traffic would be shifted would continue to be used for some rail-related function and this would be covered in the analysis of the indirect and cumulative impacts.
- Jerry Fulcher, an MDEQ representative, noted the \$10 million to be invested in the Livernois-Junction Yard and asked whether this investment affected the outcome of the EIS. Joe Corradino responded that this investment would be reflected in the base (i.e., No Action) condition as is ordinarily done in EISs.
- Robert Johnson of Michigan Consumer & Industry Services noted that the TEA-21 reauthorization was coming and wondered how the project fits into that reauthorization. Mohammed Alghurabi noted that MDOT, working with the Michigan Congressional Delegation, has provided input to the reauthorization requests for additional funding of the DIFT. Joe Corradino added that regardless of the DIFT project outcome, transportation legislation covering the next several years will have a strong emphasis on freight movement.

- Fred Berry of Wayne County Homeland Security asked how much HAZMAT would be handled by DIFT and the kind of communication the DIFT Project has on that issue with Wayne County and similar agencies/communities. Joe Corradino responded that less than one percent of intermodal freight is related to hazardous materials and that, generally speaking, the nature of hazardous material includes items like auto paint. He further noted that the DIFT Project Team had met with Mr. Slaughter of Detroit's Homeland Security agency and Mr. Shannon of Wayne County Homeland Security. Finally, the DIFT Project Team had made contact with federal Homeland Security officials and hoped to meet in December when they say they will be available.
- Karen Dumas of Mayor Kilpatrick's Office asked:
  - ✓ What was the public reaction to the project?
  - ✓ Had there been feedback from the Port Authority?
  - ✓ Who sat on the Local Advisory Council?

Joe Corradino responded that he would ask Mr. Alghurabi to address the first question. On involvement of the Port Authority, he noted its representative has testified in Lansing in support of the DIFT project. But, the DIFT Project is not planning on a link to the Port. On the Local Advisory Council, Joe Corradino indicated the list of 50+ persons on the Local Advisory Council would be provided to the Mayor's office.

Mohammed Alghurabi noted, in response to the question on public reaction to the project, that the best answer would come from the community. But, he stated his opinion that there had been a lot of professionalism in the interaction with the community. He indicated that MDOT has learned quite a bit and is doing the best it can. Mohammed Alghurabi noted that the Local Advisory Council is a community-based group with a good cross section.

Joe Corradino remarked that Alternative 2 basically grew out of public involvement. He also noted he had recently met with four local groups (Grandmont, Grandmont I, Rosedale Park and South Jeffries) and that the interaction had been positive. The president of the local business association in that area (CP/Oak) has joined the Local Advisory Council.

- Ken Dobson of Congresswoman Carolyn Cheeks-Kilpatrick's office asked whether asthma would be addressed by the air quality analysis. Joe Corradino responded that the DEIS would include some modeling of PM<sub>2.5</sub>, the results of which would be published in a separate document. The data from that analysis could be

used to judge the relative effects of different alternatives on asthma hospitalizations through the use of data provided by the Michigan Community Health Department. However, he stressed the EIS would not include a health risk assessment. It will deal with issues like asthma and air toxics on a qualitative basis.

- Chuck Tucker of Ferndale had no comments at this time.
- Bruce King of the Detroit Department of Environmental Affairs noted that diesel exhaust comprises 36 percent of PM<sub>2.5</sub> so some analysis of PM<sub>2.5</sub> should be included in the study. Joe Corradino responded that FHWA will follow the conformity rules, which do not now cover PM<sub>2.5</sub> or air toxics. If the rules change, then the analysis of those pollutants will be included in the EIS. Bruce King then asked that he be provided with information related to these issues. Joe Corradino indicated that it would be provided. Don Cameron of FHWA indicated that EPA had not designated non-attainment areas and methodologies to use for PM<sub>2.5</sub>, PM<sub>10</sub> or air toxics. So, FHWA is using an alternative approach.
- Paul Max of the Detroit Health Department asked why a health risk assessment would not be done. Joe Corradino responded that no rules have been established nor methodologies confirmed for such an analysis. He offered one example of one undefined issue as the mix of fuels to be used to generate air quality emission factors for diesel engines.
- Donald-Ray Smith of the Detroit Planning and Development Department asked if the environmental justice (EJ) analysis applies to all terminal sites. Joe Corradino noted that EJ effects for each terminal site would be addressed in the EIS.
- Wayne County Public Services representatives had no comments at this time.
- Chris Gulock of the Detroit City Planning Commission indicated a positive reaction to including Alternative 2 in the DIFT EIS, but expressed concern that the impacts of expansion on any particular site may cause elimination of the entire Alternative 2. It was recommended, then, that a backup site be examined to fill this gap. Joe Corradino indicated that the explanation of the use of other potential sites, such as Highland Park, would be covered in the EIS.
- Kathryn Savoie of ACCESS and CBRA questioned the Purpose and Need Statement by indicating that Norfolk Southern's decision to shift Triple Crown and Delray intermodal business to the Livernois-Junction Yard allows a private corporation to shape public policy. Also:

- ✓ The benefits from the project need to be separated from the mitigation measures.
  - ✓ The Arab community is a distinctly recognized minority in the state of Michigan and needs to be included in the Environmental Justice analysis.
  - ✓ The planned PM<sub>2.5</sub> analysis is inexcusable.
  - ✓ The exclusion from the environmental impact analysis of a health assessment is unacceptable.
- Olga Savic of State Representative Tobocman’s office stated that the Livernois-Junction Yard manager indicated paving would double capacity. Also:
    - ✓ There seems to be two issues: one, untying “knots” in the rail system, and the second getting more land at individual terminal sites. If the “knots were untied,” would that solve the capacity need?
    - ✓ It appears that the alternatives process had already been established and wondered about other alternatives with respect to Moroun’s (Riverview-Trenton Railroad) terminal and the use of greenfields.
    - ✓ How will community cohesion be evaluated? What sort of model be used? Is there a model that lists the factors the community cares about?

In response, Joe Corradino noted that paving the Livernois-Junction Yard was part of the plan with Alternatives 2 and 3; the railroads are not likely to undertake this by themselves under Alternative 1. Further, the “knots” need to be fixed under either Alternatives 2 or 3 to make the system work. Third, greenfields are not an option for the consolidation alternative. That had been looked at before and determined not to be prudent. Finally, there is no model, as such, that will be used to address community cohesion. In past analyses, this issue has been addressed by examining population characteristics, separation of neighborhoods from schools, parks and other community facilities by a transportation improvement, and analysis of similar issues.

- Karen Kavanaugh of CBRA and the Southwest Detroit Business Association noted several points:
  - ✓ There should be clarification that the project would primarily benefit the auto companies.
  - ✓ What level of public financing would be required?
  - ✓ What would be the specific economic benefit for facilitating the movement of freight to the City of Detroit as opposed to the region?
  - ✓ What would the economic benefits be to the host communities?
  - ✓ What is the increase in truck traffic, not only in Southwest Detroit, but also on Detroit freeways and neighborhoods?
  - ✓ What impacts would there be on future land use and development?

- ✓ What impacts would there be on existing projects and public investments?
- ✓ Can a case be made that future manufacturing location and private investment will be favorable to Detroit and not just to the region?
- ✓ What would be the effect on the city's tax base?

Finally it was stated: for the record, it's good to hear that Alternative 2 is consistent with the community improvement plan for Junction Yard that the coalition (CBRA) has submitted as an alternative to be evaluated under the EIS. That took place ten days ago. That is new information to us, because we had previously understood that, if there was no expansion of Junction Yard, there would be no funding to improve the infrastructure surrounding it.

Responses to the above by Joe Corradino indicated that 70 to 90 percent of the outbound shipments at this time involve auto-related activity. Inbound traffic involves all sorts of goods being distributed in the region. He indicated the EIS economic analysis would attempt to address the issue of impacts on host communities, job losses and gains, the effects on the tax base, and the like. Because forecast demand exceeds capacity, it is the role of government to improve the transportation system for business, industry and the military. That includes improvements to the terminals and outside the terminals. Joe Corradino noted, however, that under Alternative 2, it was unlikely that the truck-only road would be built because there would not be a sufficient concentration of trucks to justify it. Likewise, certain drainage improvements associated with the truck-only road would not then be feasible. But, other improvements are associated with Alternative 2, including adjustments to Central and Lonyo, and better access at I-94 at Livernois.

- Sarah Lile, head of the Detroit Department of Environmental Affairs, stressed that air quality issues should be evaluated beyond those covered by conformity.

Having concluded inquiries of groups sitting at the table, Greg Johnson asked whether there were any individuals from the public that cared to ask questions or make comments.

- Mohan Farhat of the Detroit Water and Sewer Department asked whether impacts to water systems would be reflected in the EIS. The response was yes.
- Josephine Powel of the Department of Environment for Wayne County noted that there are air quality issues of industrial sources that should be included in analysis of impacts generated by the DIFT project. She also stressed environmental justice was another key project issue.

- Martha Gruelle, Director of Southwest Detroit Environmental Vision and a member of CBRA, made several comments:
  - ✓ It is impossible to understand the scope of Alternative 2 at this time. There are no conceptual layouts. There is nothing to estimate truck traffic on potential truck routes.
  - ✓ The definition of minorities on page 12 of the scoping document is a problem because it does not consider Arabs. The USDOT definition of groups covered by environmental justice provisions does not go far enough.
  - ✓ National security is listed as a major purpose of the project now, after many years of discussion, when there was no mention of the U.S. military earlier.
  - ✓ If Norfolk Southern indeed has a shortfall in terms of capacity, why are they moving Triple Crown and Delray to the Livernois Yard? The big part of the need for the project is based on one company's decisions.
  - ✓ Impacts of air toxics and PM<sub>2.5</sub> should be considered in terms of lost school days and lost work days, if they aren't included in the EIS as environmental impacts.
  - ✓ It is good to see some air quality analysis will be done for 2015. PM<sub>2.5</sub> calculations also should be done for 2015.
  - ✓ The people involved in the project's public meetings have heard many times from the residents and elected officials representing Southwest Detroit that the project looks like a disaster for Southwest Detroit, at least Alternative 3.
  - ✓ Communities for a Better Rail Alternative is being condemned for being too soft on MDOT, for ever talking with MDOT about alternatives because community members and elected officials say to us the answer is no.
  
- Mickey Blashfield, a representative of Centra, asked if the Riverview-Trenton facility would be included in the analysis. Joe Corradino responded that, if his understanding of the Surface Transportation Board's decision is correct, adding the capacity of the Riverview-Trenton facility doesn't diminish the fact that more intermodal capacity is needed in the region.
  
- Kathryn Savoie, the representative of ACCESS/CBRA asked if the truck-only road from Springwells is still considered viable. Joe Corradino responded that until there is further analysis, both the Schaefer Road and Springwells truck-only road options are under consideration for Alternative 3, but that the truck-only road was likely not viable based on truck volumes for Alternative 2.

Greg Johnson asked if there were any further questions and he noted that the transcript of the meeting would be available on the Web site.

- Robert Sills of the Michigan Department of Environmental Quality-Air Quality Division asked again what the scope of analysis would be with respect to PM<sub>2.5</sub>. Would there be only emissions determined or would impacts (concentrations) be estimated? And, what will be included in the EIS? Joe Corradino responded that the analysis will only be of emissions, not concentrations. And, PM<sub>2.5</sub> would be reported in an appendix to the EIS. Air toxics will be discussed in the EIS on a qualitative basis, using calculations of surrogate pollutants, like volatile organic compounds (VOCs).
- Paul Max, the representative of the Detroit Department of Public Health, asked if the hospitalization data spoken of earlier were for emergency rooms only. Joe Corradino indicated he believed that those data are for emergency hospitalizations by zip code for two time periods.

The meeting then ended at 12:15 p.m.

**Detroit Intermodal Freight Terminal Project  
Scoping Meeting  
June 4, 2003, 10:00 a.m.  
Northwest Activities Center**

Attendance

NAME	COMPANY/AGENCY	NAME	COMPANY/AGENCY
<b><u>Agency Representatives</u></b>		<b><u>Agency Representatives (continued)</u></b>	
Abdel Abdalla	FHWA	Olga Savic	Rep. Steve Tobocman
Heidi Alcock	City Planning Commission	Robert Sills	Michigan DEQ-AQD
Chris Ammerman	City of Detroit Law Dept.	Daljit Singh	DWSD
Fred Berry	Wayne Co. Homeland Security	Donald-Ray Smith	Det. Planning & Dev.
Don Cameron	FHWA	Jim Sype	Mayor's Office
Michael Darga	Wayne County DPS-Eng	Doug Topolski	Dearborn P.D. Traffic Safety
Ken Dobson	Congresswoman Kilpatrick	Chuck Tucker	City of Ferndale
Karen Dumas	Mayor's Office	Jacquelyn Watts	Mayor Kilpatrick's Office
Ajere Evans	City of Detroit Mayor's Office		
M. Farhat	DWSD	<b><u>Other</u></b>	
Sherrie Farrell	City of Detroit	Mickey Blashfield	Centra
Fred Feliciano	Mayor Kilpatrick's Office	Mario Ferrini	Ferrini Contracting
Jerry Fulcher	MDEQ-GLMP	Victor Ferrini	Ferrini Contracting
Sam Geevarghese	PLD	Martha Gruelle	SDEV/CBRA
Christopher Gulock	City Planning Comm.	Karen Kavanaugh	SDBA/CBRA
Ruth Hepfer	FHWA	Joanna Ladki	ACCESS
Robert Johnson	Michigan CIS	Kathryn Savoie	ACCESS/CBRA
Dion Johnson	Mayor's Office		
Sherry Kamke	US EPA	<b><u>Staff/Consultant</u></b>	
Bruce M. King	DEA/City of Detroit	Ari Adler	TCG
Ken Kucel	Wayne Co. DPS	Geralyn Ayers	MDOT
Tarik Lester	Congresswoman Kilpatrick	Jeff Edwards	MDOT Metro Region
Sarah Lile	DEPE/City of Detroit	Tom Hanf	MDOT
R. Daryl Lundy	Dept. of Mil. & Vet. Affairs	Randy Henke	Benesch
Juan Jose Martinez	Councilwoman Sheila Cockrel	Stephanie Litaker	MDOT Communications
Paul Max	Detroit Health Dept.	Bob Parsons	MDOT
Glenn Osowski	Congressman John Conyers	Sherry Piacenti	MDOT
Josephine Powel	Wayne Co. Dept. of Env.	Doug Strauss	Benesch
Samir Ray	PLD		

## **Appendix B**

### **Relocation Plan - Conceptual Stage**



Michigan Department of Transportation  
Real Estate Support Area  
Conceptual Stage Relocation Plan  
Detroit Intermodal Freight Terminal (DIFT) Project

October 8, 2004

**GENERAL AREA AND PROJECT INFORMATION**

The proposed Detroit Intermodal Freight Terminal (DIFT) Project includes four intermodal terminals, the NS/CSX Livernois-Junction Yard in Southwest Detroit, the CP/Expressway in Corktown, the CP/Oak in Grandmont and the CN/Moterm in Ferndale, and is for the purpose of improving/expanding intermodal freight shipping in southeast Michigan.

The general area of the proposed project consists of a mixture of residential, commercial and industrial properties.

**DISPLACEMENTS**

No Action Alternative

0 Residential  
0 Businesses

Alternative 2

Livernois-Junction

Option A

0 Residential  
8 Businesses

Option B

0 Residential  
11 Businesses

Option C

0 Residential  
8 Businesses

CP/Expressway

0 Residential  
1 Non Profit Organization

CP/Oak

Option A

0 Residential  
5 Businesses

Option B

0 Residential  
6 Businesses

CN/Moterm

0 Residential  
0 Businesses

**DISPLACEMENTS CONTINUED**

**Alternative 3**

Livernois-Junction	83 Residential 64 Businesses
--------------------	---------------------------------

**Alternative 4**

Livernois-Junction	33 Residential 51 Businesses
C/N Moterm	0 Residential 0 Businesses

**DISPLACEMENT EFFECTS AND ANALYSIS**

Property acquired for this project will be purchased in segments or phases, providing for the efficient and complete relocation of all eligible displaced residents, businesses and non profit organizations impacted by the project. Several of the businesses are specialized in natural, requiring a longer relocation time frame. Completing the project in phases will allow an adequate period of time for the relocation process of all parcels and ensure the availability of a sufficient number of replacement properties in the local area for all eligible displacees.

**Residential:** The project may cause the displacement of approximately 83 residential properties with the NS/CSX Livernois-Junction Yard Alternative. A study of the housing market in the project area indicates a sufficient number of replacement homes and rentals will be available throughout the relocation process. It is anticipated that the local residential real estate market will have the capacity to absorb the residential displacements impacted by this project.

**Businesses:** The project may cause the displacement of approximately 64 businesses depending on which alternative is utilized. A review of the local commercial/industrial real estate market indicates that there are a sufficient number of replacement sites available to relocate eligible displaced businesses. However, several of the businesses will require zoning approval and thus, special consideration will be necessary on these parcels. Displacement of these businesses is not expected to have a major economic or otherwise generally disruptive effect on the community impacted by this project.

**Non Profit Organizations:** The project may cause the displacement of approximately 1 non profit organization. A review of the local real estate market indicates that there is an adequate supply of properties available as replacement sites for eligible non profit organizations.

**ASSURANCES**

The acquiring agency will offer assistance to all eligible residents, businesses and non profit organizations impacted by the project including persons requiring special services and assistance. The Agency's relocation program will provide such services in accordance with Act 31, Michigan P.A. 1970; Act 227, Michigan P.A. 1972; Act 87, Michigan P.A. 1980, as amended, and the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Uniform Act) as amended. The acquiring agency's relocation program is realistic and will provide for the orderly, timely and efficient relocation of all eligible displaced persons in compliance with state and federal guidelines.

**Prepared By:**



William J. Swagler

Date: October 8, 2K4



## **Appendix C**

### **Draft Memorandum of Agreement with SHPO**



**DRAFT**  
**MEMORANDUM OF AGREEMENT**  
**BETWEEN THE FEDERAL HIGHWAY ADMINISTRATION**  
**AND THE MICHIGAN STATE HISTORIC PRESERVATION OFFICER**  
**SUBMITTED TO THE ADVISORY COUNCIL ON HISTORIC PRESERVATION**  
**PURSUANT TO 36 CFR PART 800.6(b)(1)**  
**REGARDING THE DETROIT INTERMODAL FREIGHT TERMINAL**  
**IN DETROIT, WAYNE COUNTY, MICHIGAN**

**WHEREAS**, the Federal Highway Administration (FHWA) of the U.S. Department of Transportation has determined that improvements to the Detroit Intermodal Freight Terminal (DIFT) in Wayne County, Michigan will have an adverse effect upon the following historic resource(s), which has/have been listed, declared eligible or which appear to meet the criteria for listing in the National Register of Historic Places (NRHP):

- Specific sites/resources to be determined based on the preferred alternative.

**WHEREAS**, the FHWA has consulted with the Michigan State Historic Preservation Officer (SHPO) pursuant to 36 CFR Part 800, regulations implementing Section 106 of the National Historic Preservation Act (16 U.S.C. 470f) (the Act); and

**WHEREAS**, the Michigan Department of Transportation (MDOT) participated in the consultation and has been invited to concur in this Memorandum of Agreement (MOA),

**NOW, THEREFORE**, the FHWA and the SHPO agree that the improvements to the DIFT in Wayne County shall be implemented in accordance with the following stipulations in order to take into account the effect of the project on historic properties.

**STIPULATIONS**

The FHWA will ensure that the following measures are carried out:

**I. DOCUMENTATION**

Prior to the start of construction activities, MDOT will record the [the agreed upon affected properties] to create a permanent record of their history and current conditions at the time the project commences. MDOT will contact the SHPO to determine the appropriate level(s) of documentation. SHPO may require MDOT to provide original copies of the documentation with photos to appropriate local archives designated by the SHPO.

## **II. ABOVE GROUND HISTORIC RESOURCES**

It has been determined that no NRHP eligible or listed above-ground historic resources are located within the Area of Potential Effects for the **CP Oak** location. Additional information and consultation will be required to determine appropriate steps to avoid, minimize, and/or mitigate adverse impacts, where applicable, to those historic above-ground resources determined to be listed, eligible for listing, and/or potentially eligible for listing on the NRHP within the **CP Expressway**, **CN Moterm**, and/or **CSX Livernois-Junction** sites. These resources are identified in the SHPO letter dated October 18, 2004.

## **III. ARCHAEOLOGICAL RESOURCES**

It has been determined that it is unlikely that intact archaeological deposits survive at **CP Oak**, **CP Expressway**, and **CN Moterm** and no further action will be required for these locations. However, further investigation is required for potential archaeological sites that have been identified within the **CSX Livernois –Junction** location.

Should these sites be determined to be viable it is agreed the sites will be important for the information they may yield and not for preservation in place.

## **IV. LANDSCAPING AND SITE CONSIDERATIONS**

MDOT shall ensure that the frontages of [locations to be identified] are landscaped in accordance with a landscape plan designed in consultation with and approved by the SHPO and the affected property owners. MDOT will retain an historian meeting the Secretary of the Interior's Professional Qualifications Standards (48 FR 44738-9) and trained in historic landscape analysis and design to assist in plan development.

## **V. Amendment**

Any party to this MOA may propose to the other parties that it be amended, whereupon the parties will consult in accordance with 36 CFR 800.6(c)(7) to consider such an amendment.

## **VI. Dispute Resolution**

Should the SHPO or MDOT object within 30 (thirty) days to any actions proposed pursuant to this MOA, the FHWA shall consult with the objecting party to resolve the objection. If the FHWA determines that the objection cannot be resolved, the FHWA shall forward all documentation relevant to the dispute to the

Advisory Council on Historic Preservation (Council). Within 45 (forty-five) days after receipt of all pertinent documentation, the Council will either:

- Provide the FHWA with recommendations, which the FHWA will take into account in reaching a final decision regarding the dispute; or
- Notify the FHWA that it will comment pursuant to 36 CFR 800.7(c) and proceed to comment. Any Council comment provided in response to such a request will be taken into account by FHWA in accordance with 36 CFR 800.7(c)(4) with reference to the subject of the dispute.

Execution of this MOA and submission to the Council evidences that FHWA has afforded the Council an opportunity to comment on the improvements to the DIFT and its effects on historic properties.

FEDERAL HIGHWAY ADMINISTRATION

By: \_\_\_\_\_ Date: \_\_\_\_\_  
James J. Steele, Division Administrator

MICHIGAN STATE HISTORIC PRESERVATION OFFICER

By: \_\_\_\_\_ Date: \_\_\_\_\_  
Brian Conway

Concur:

MICHIGAN DEPARTMENT OF TRANSPORTATION

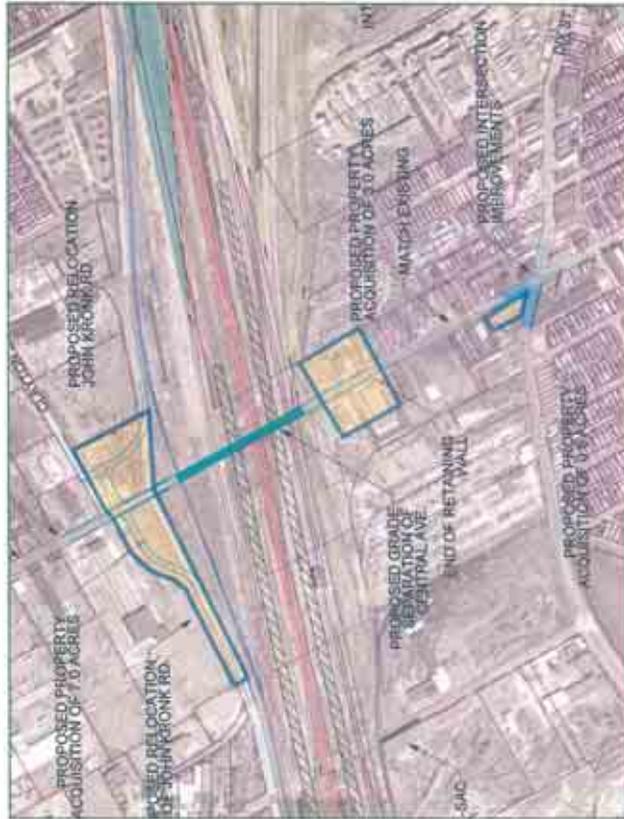
By: \_\_\_\_\_ Date: \_\_\_\_\_  
Susan Mortel, Director, Bureau of Transportation Planning



## **Appendix D**

### **Right-of-Way Areas Needed by Alternative**

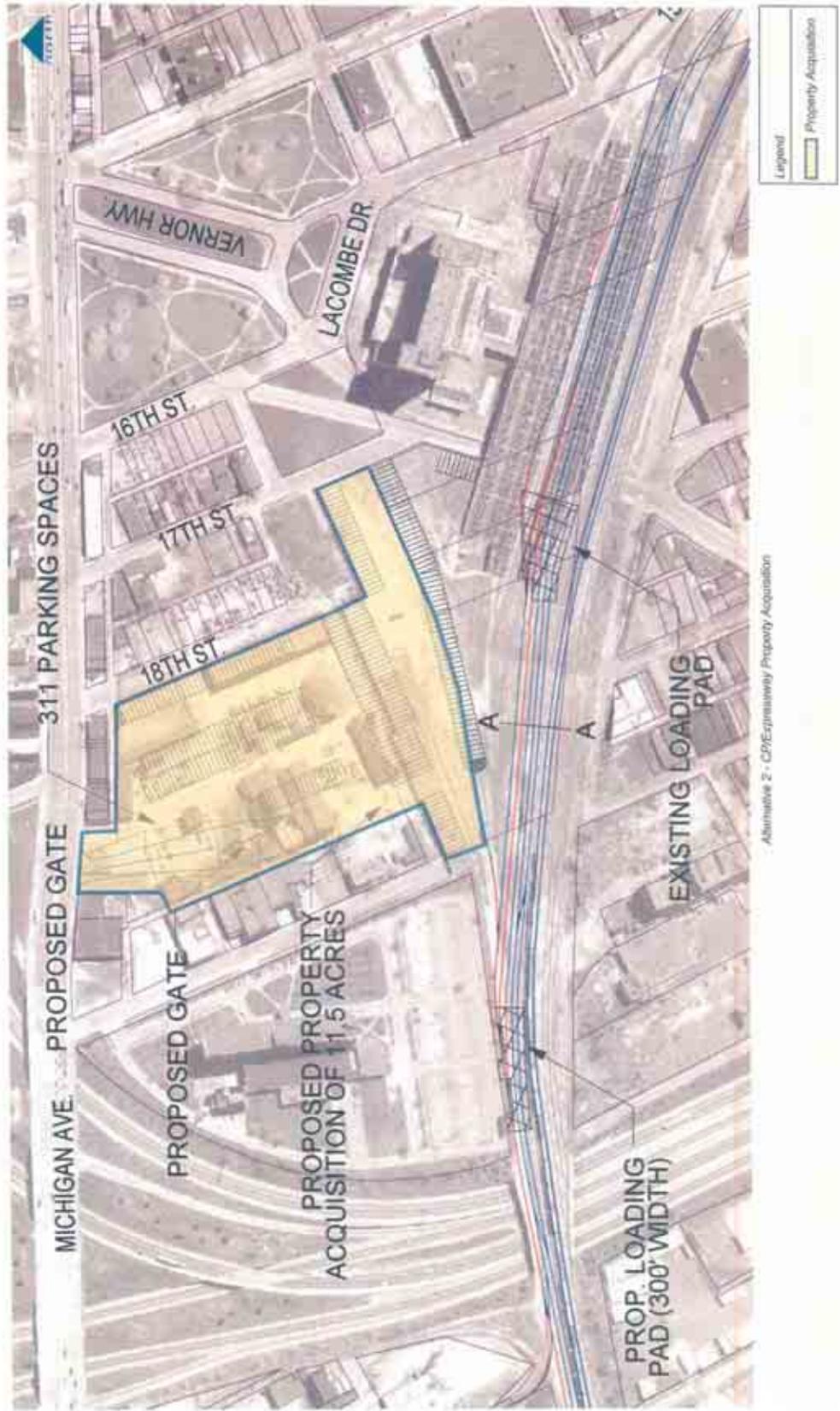


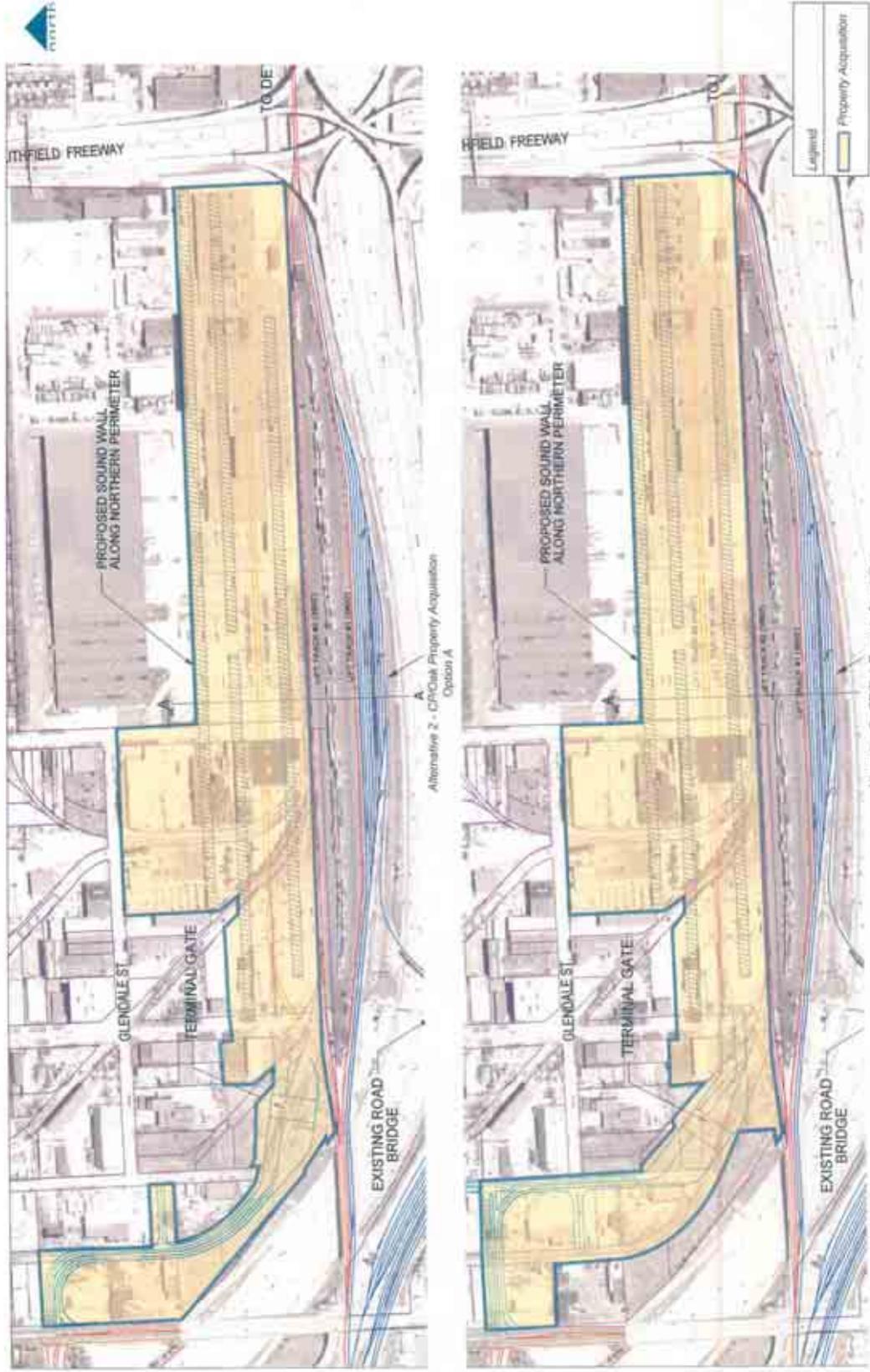


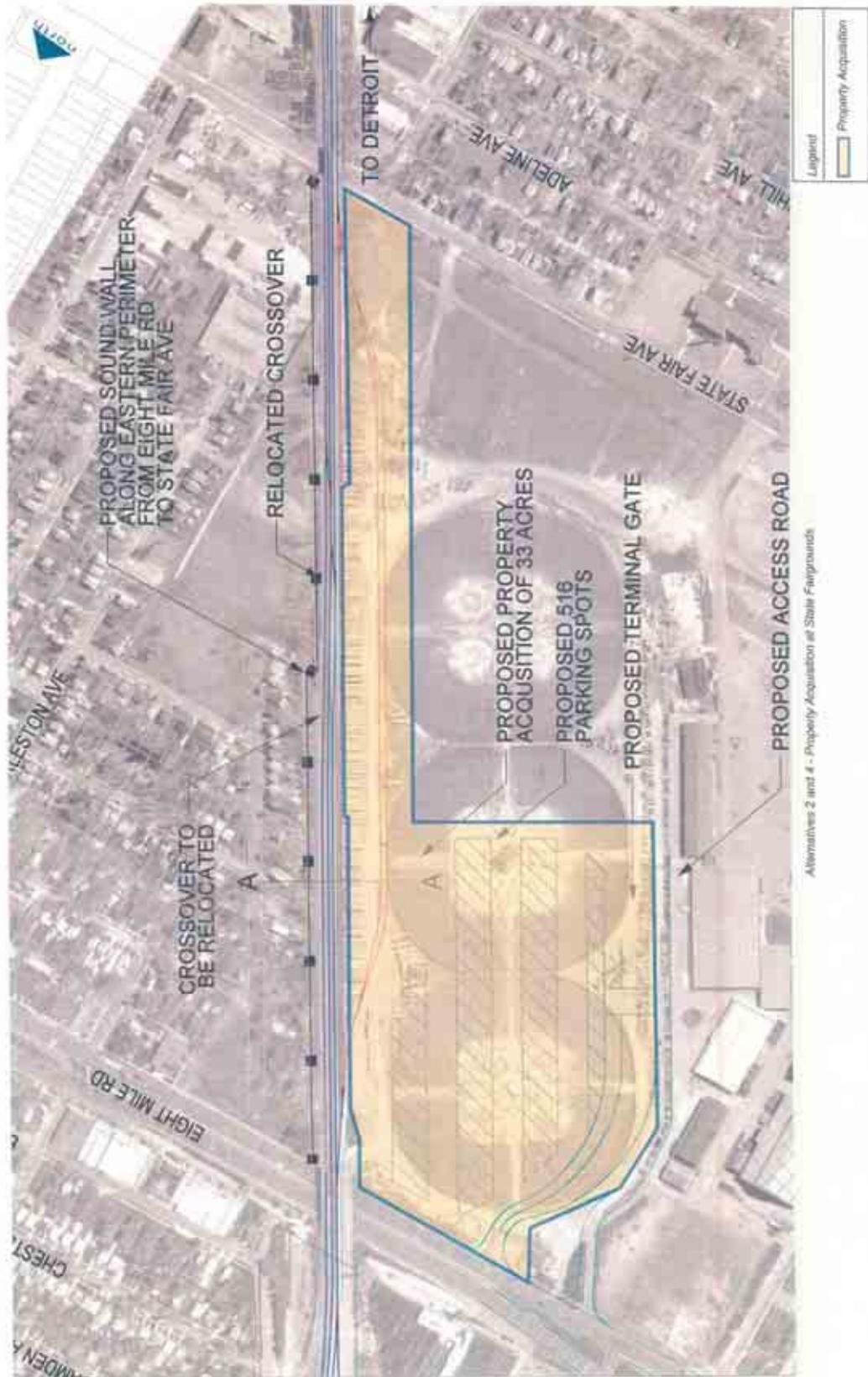
Alternative 2 - Livemans-Junction Option A, B & C  
Property Acquisition Central Street Arms

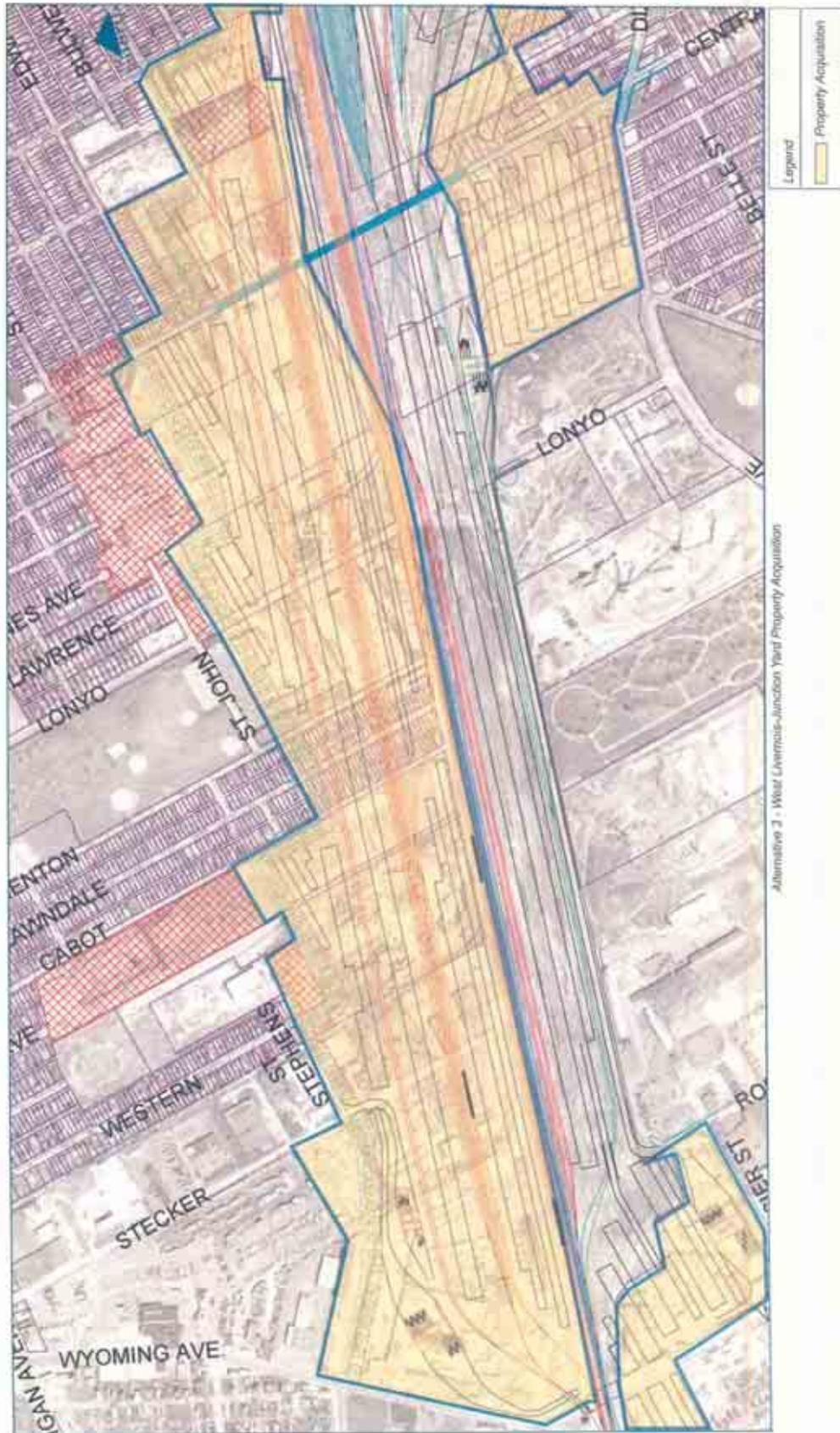


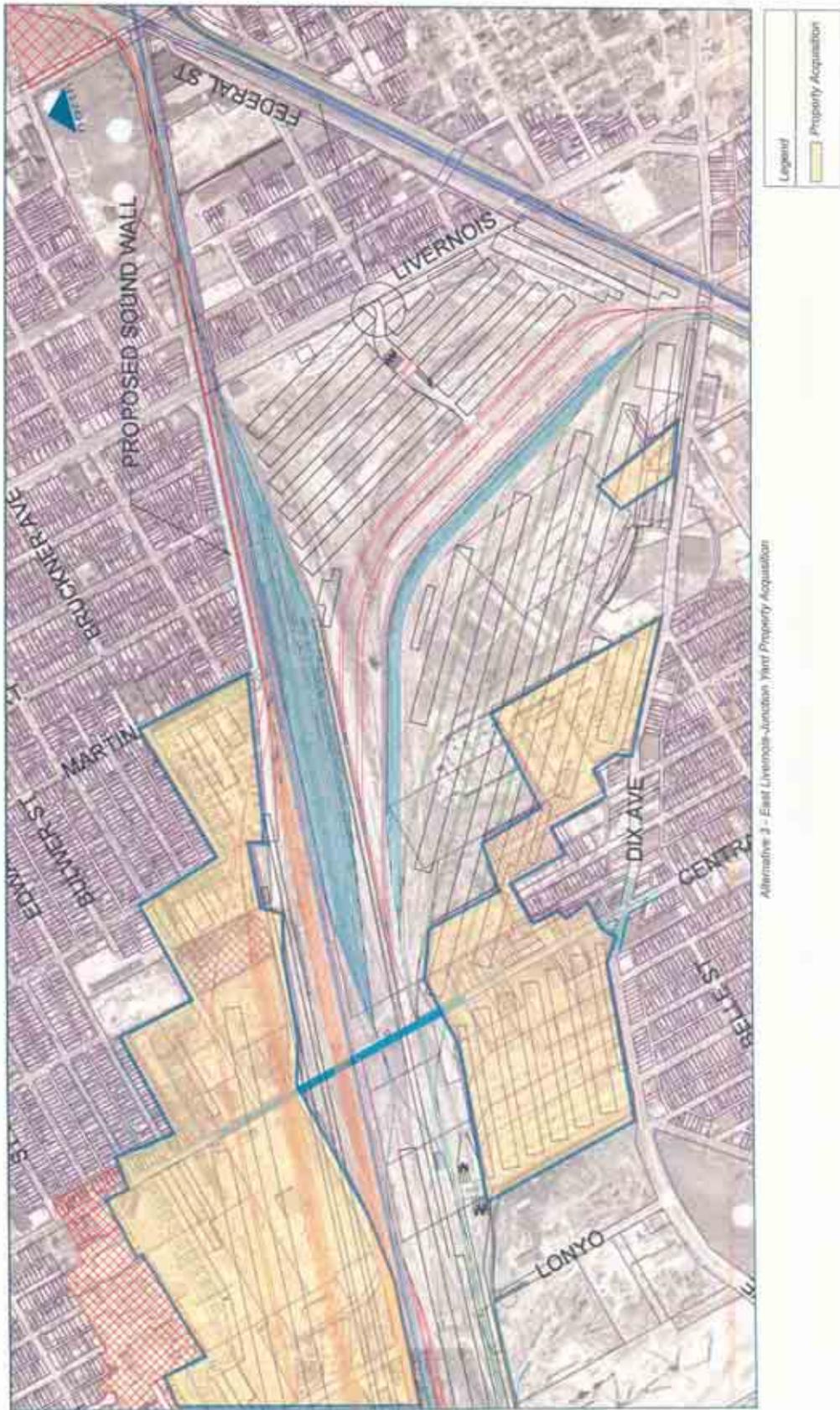
Alternative 2 - Livemans-Junction Option B  
Property Acquisition West Yard

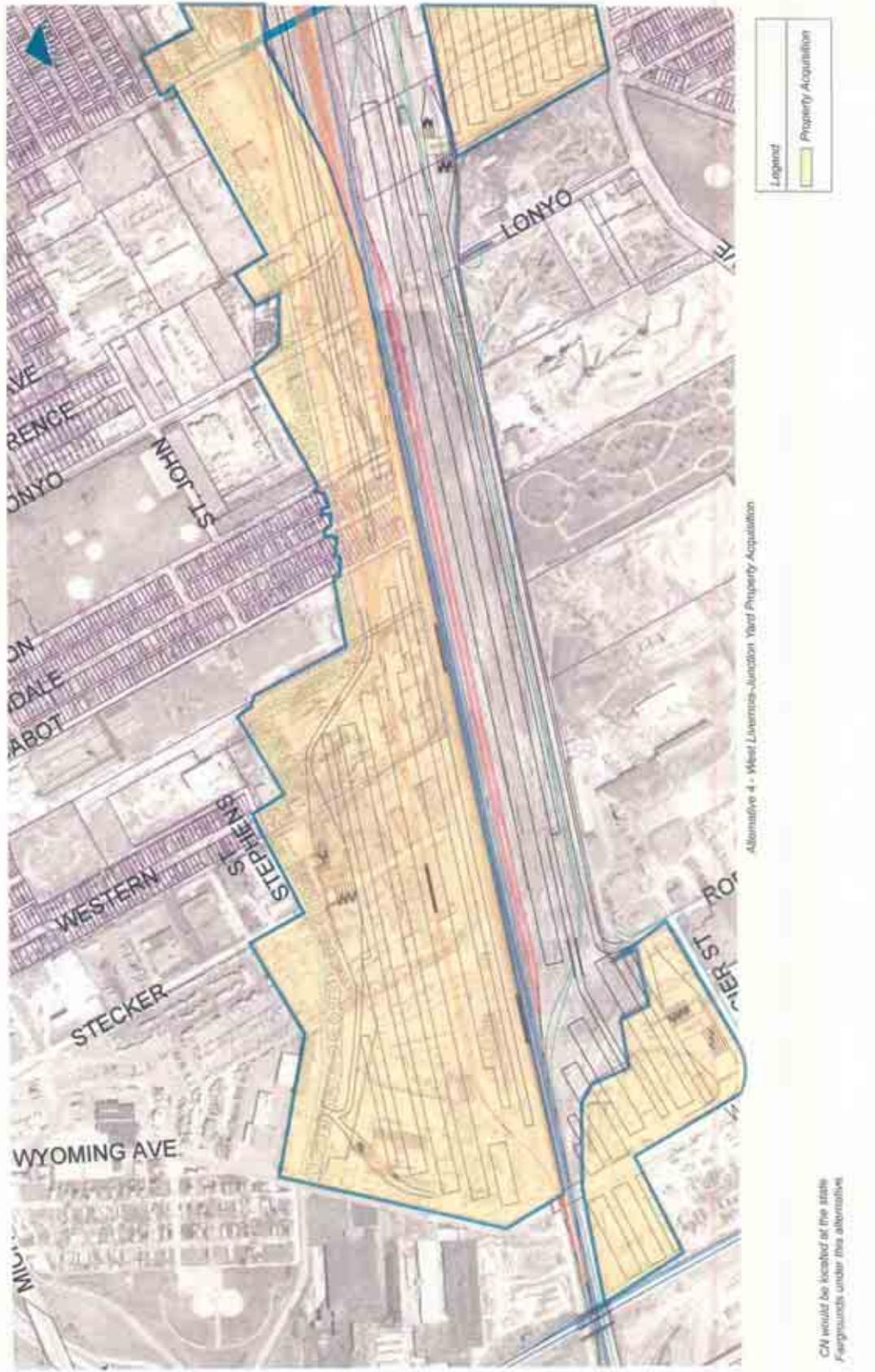


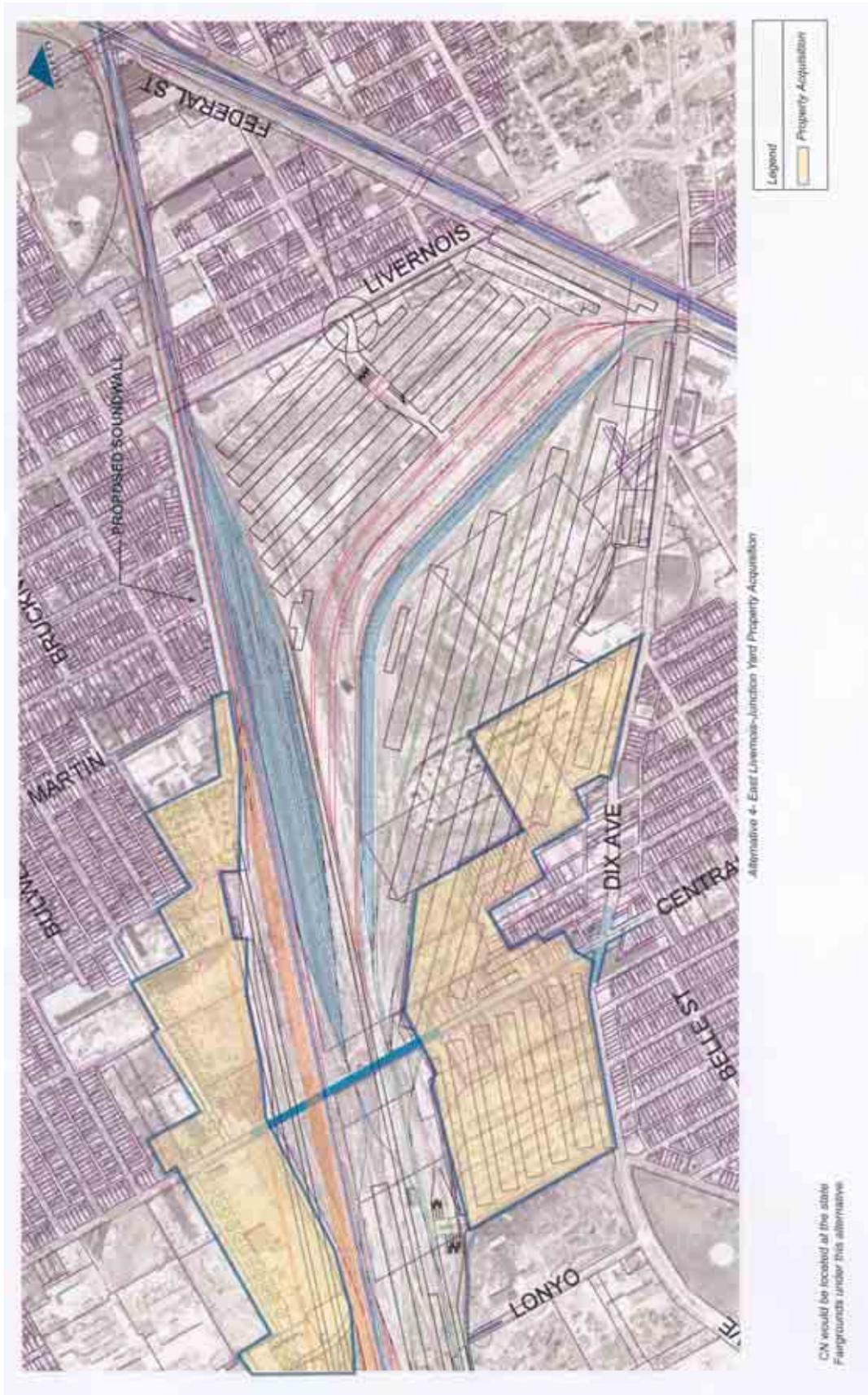












**Appendix E**  
**Air Quality Protocol**



# **Air Quality Analysis Protocol**

## **Detroit Intermodal Freight Terminal**

### **Environmental Impact Statement**

**Updated March 2005**



## 1.0 Introduction

Under the National Environmental Policy Act (NEPA), federal agencies are required to identify and describe the potential impacts to the human and natural environments as a result of their action(s), including those to air quality. This paper describes the air quality analysis that will be performed for the Detroit Intermodal Freight Terminal project (DIFT) environmental impact statement.

The DIFT project proposes to enhance development of intermodal (truck/rail) terminals operated by the four Class I Railroads<sup>3</sup> that serve Michigan to provide improved intermodal service to business, industry and the military. Four intermodal terminals are included in the DIFT EIS: the Livernois-Junction Yard in Southwest Detroit (operated by CSX and Norfolk Southern); Canadian Pacific's Expressway terminal behind the Michigan Central Depot just north of Bagley (temporarily closed as of June 2004); the CP/Oak Terminal located in the northwest corner of the intersection of I-96 and the Southfield Freeway; and, the Canadian National/Moterm Terminal on the Wayne County/Oakland County border north of 8 Mile Road between I-75 and Woodward Avenue.

Because of the concentrated activities of heavy-duty diesel trucks, locomotives, and container-handling equipment with the DIFT project, air toxics and fine particulate matter (PM<sub>2.5</sub>)<sup>4</sup> are of particular interest. There are no established regulatory standards specifying harmful concentration levels of air toxics, no attainment area designations, and no analysis protocol for evaluating air toxics impacts for transportation projects. Nevertheless, given community concern for air toxics, FHWA recognizes the need to address several key air toxics along with PM<sub>2.5</sub> (fine particulates) and the other NAAQS pollutants, through the protocol described here.

## 2.0 Analysis Elements

The DIFT air quality analysis will cover:

1. The attainment status of the project area with respect to the NAAQS, notably carbon monoxide (CO), ozone, and PM<sub>2.5</sub>.
2. A CO hotspot analysis at key intersections in the terminal areas that will compare CO concentrations in areas of human activity to the 1- and 8-hour NAAQS.
3. Pollution trends, and a discussion of U.S. EPA measures to improve air quality.
4. A discussion of air toxics, including a qualitative discussion of health risks and current science.
5. An estimate of the pollutant burden<sup>5</sup> that will be generated by each terminal under each alternative. This burden analysis will include the NAAQS pollutants and several key air toxics.
6. An estimate of the pollutant burden produced by mobile source activities on the local public roadway network near each terminal that would experience traffic volume changes. This burden analysis will include the NAAQS pollutants and several key air toxics.
7. A discussion of air quality conformity.
8. Potential mitigation that could accompany the proposed project.

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<sup>3</sup> A Class I Railroad has at least \$250 million in revenue per year.

<sup>4</sup> PM<sub>2.5</sub> refers to particulate matter that is 2.5 micrometers or smaller in size. Sources of PM<sub>2.5</sub> include fuel combustion from automobiles, power plants, wood burning, industrial processes, and diesel-powered vehicles such as buses and trucks. These fine particles are also formed in the atmosphere when gases such as sulfur dioxide, nitrogen oxides, and volatile organic compounds (all of which are also products of fuel combustion) are transformed in the air by chemical reactions. Fine particles are of concern because they are so small they are able to penetrate to the deepest parts of the lungs, where the body has difficulty expelling them.

<sup>5</sup> Pollutant burden means the mass of a pollutant produced in a given period of time. In this case pollutant burden is expressed in terms of tons per year.

The goal of the analysis is to provide decision-makers and the public with information to view the relative impacts of each alternative. The results of the analysis will not provide a means for a pass/fail comparison to standards (other than carbon monoxide).

### 3.0 Regional Attainment Status

The NAAQS are set at levels that U.S. EPA believes will protect public health and welfare. NAAQS are used as the basis for determining an area's air quality designation (i.e., status, as "attainment" or "nonattainment"). Generally, a nonattainment area is one that does not meet a particular NAAQS. An area may be classified nonattainment for one or more pollutants and attainment for others. It is also possible for a nonattainment area to be reclassified as attainment, if it is able to achieve the standard over time. Such areas are given a "maintenance" designation, requiring them to demonstrate continued compliance with the standard, but not requiring additional controls to reduce emissions.

The air quality analysis and report will discuss Southeast Michigan's attainment status. The study area is now a maintenance area for the CO standard and is in nonattainment of the 8-hour ozone standard. It was designated to be in nonattainment for PM<sub>2.5</sub> on December 15, 2004 (effective April 5, 2005). A portion of the southwest Detroit area is also a maintenance area for PM<sub>10</sub>, but this is not a part on the mobile source review process on the part of SEMCOG, the Southeast Michigan Council of Governments.

### 4.0 Hotspot Analysis

Carbon monoxide (CO) hotspot analysis is performed to ensure that project-related traffic does not cause a violation of the 1- or 8-hour NAAQS for CO. Carbon monoxide is a colorless, odorless, poisonous gas produced by incomplete combustion. Traffic information for each alternative is combined with information about roadway geometry and traffic flow conditions to determine the concentrations of CO at sensitive receptors. Sensitive receptors are locations where humans might be expected to be present. This analysis is done with a computer program called CAL3QHC. This program requires emission factors for various types of vehicles operating under various speeds and conditions (such as ambient temperature and fuel type), expressed in grams per mile. These emission factors are generated using the U.S. EPA-approved model, MOBILE6.2. Input parameters that go into the MOBILE6.2 model, such as the vehicle fleet mix and age, are drawn from SEMCOG (Southeast Michigan Council of Governments) in consultation with U.S. EPA and the Michigan Department of Environmental Quality (MDEQ).

## 5.0 Pollution Trends – NAAQS Pollutants and Air Toxics

The EIS will provide information on past trends in NAAQS pollutant emissions and regulatory measures taken by U.S. EPA to continue the downward trends. Historic data from local monitoring stations nearest to the terminals (or with the most complete records) will be documented.

Future air quality trends will be discussed based on U.S. EPA forecasts of the expected consequences of recently implemented regulations related to on-road diesel engines and fuels. Trends in passenger vehicle emissions will also be noted.

Diesel exhaust is a complex mixture of inorganic and organic compounds that occur as a blend of gases and particles. The gaseous components include nitrogen oxides, sulfur compounds, and low-molecular-weight hydrocarbons, such as the aldehydes, benzene, 1,3-butadiene, and polynuclear aromatic hydrocarbons. The particle phase of diesel exhaust consists of elemental carbon, adsorbed organic compounds and small amounts of sulfate, nitrate, metals and other trace elements. Diesel particulate matter (DPM) has been estimated to comprise about six percent of the total PM<sub>2.5</sub> inventory nationwide but more in urban areas, excluding natural and miscellaneous sources (U.S. EPA, 2002).

Compounds of most specific interest for the DIFT project are those found in particulate matter and, to a lesser degree, volatile organic compounds (VOCs), which are also emitted by diesel vehicles. Data from the 1996 National Toxics Inventory indicate that mobile sources account for approximately 50 percent of air toxics emissions (U.S. EPA, 2000). Several of the air toxics that EPA has identified as priority mobile source air toxics (MSATs) constitute a subset of all VOCs. The MSATs considered in the DIFT environmental impact analysis are benzene, 1,3-butadiene, formaldehyde, acetaldehyde, and acrolein. Also included on EPA's list is diesel particulate matter (DPM). These particular air toxics were selected because: 1) mobile sources, both on-road and non-road, contribute the majority of annual emissions for five of these air toxics (acetaldehyde, acrolein, benzene, 1,3-butadiene and formaldehyde) on a national basis; 2) they are representative of the complete list of gaseous mobile source air toxics; and, 3) these air toxics are some of the more important ones from a health standpoint. It is important to note that almost all of the remaining hazardous air pollutants (HAPs) emitted by mobile sources are trace metals, and compounds associated primarily with the particulate phase. Stationary and area sources account for most of the nationwide emissions of these HAPS.

EPA has issued a suite of motor vehicle and fuels regulations, including: 1) tailpipe emission standards for cars, SUVs, mini-vans, pickup trucks and heavy trucks and buses; 2) standards for cleaner-burning gasoline; 3) a national low-emission vehicle program; and, 4) standards for low-sulfur gasoline and diesel fuel. By the year 2020, these requirements are expected to reduce emissions of a number of air toxics (benzene, 1,3-butadiene, formaldehyde, and acetaldehyde) from highway motor vehicles by about 75 percent and diesel particulate matter by over 90 percent from 1990 levels (U.S. EPA, 2000).

EPA issued a regulation in May 2004 to control emissions from diesel-powered non-road engines, such as construction equipment and railroad locomotives. EPA also provides assistance in identifying and implementing voluntary programs, such as diesel retrofits, to achieve additional reductions.

The EPA-approved MOBILE6.2 model allows projections of future emission factors for the NAAQS pollutants and certain air toxics associated with mobile sources. The model accounts for the recent EPA regulatory changes. Emission factors vary by speed and type of vehicle. By focusing on representative vehicle types and speeds, future emission factors can be related to trends over time (i.e. 2004, 2015, and 2025). Graphics to illustrate these trends will be developed for the following conditions:

- Passenger vehicles and NAAQS pollutants at: a) 10, and b) 30mph
- Passenger vehicles and air toxic pollutants at: a) 10, and b) 30mph
- Trucks and NAAQS pollutants at: a) 10, and b) 30mph
- Trucks and air toxic pollutants at: a) 10, and b) 30mph

## 6.0 Air Toxics and PM<sub>2.5</sub> – Health Effects and Limitations on Current Science

Research is underway by EPA and others at a national level to evaluate ambient air toxics in order to understand their spatial variability in urban settings; evaluate data from mobile-source oriented monitors; and, provide data for the National Air Toxics Network maintained by EPA. One of the programs sponsored by EPA is the Detroit Air Toxics Pilot Project, which began collecting data from monitoring stations in 2001. Data from these programs may ultimately be used to develop standards to address health or environmental risks from air toxics.

Analysis of DIFT air toxics and PM<sub>2.5</sub> will qualitatively address health risks, the limitations of the current state of the science to quantify such risks, and potential benefits from selected mitigation measures. This approach is consistent with the CEQ NEPA regulations (40 CFR 1502.22 and 1502.24) that hold agencies accountable for the scientific integrity of sources and procedures relied upon for decision-making. Under this regulation, when the means to obtain data are unavailable (in this case, the state of the science for air toxics and PM<sub>2.5</sub>), agencies must acknowledge such limitations, discuss the relevance to impacts on the human environment, summarize existing credible scientific evidence, and make reasoned judgments of impacts based on theoretical approaches.

Some health agencies and research institutions have reported on the health effects of air toxics and PM<sub>2.5</sub>. Exposure to these pollutants at sufficient concentrations and durations may result in an increased chance of experiencing serious health effects. These health effects appear to include damage to the immune system, as well as neurological, reproductive (e.g., reduced fertility), developmental, respiratory and other health problems. The health effects from some air toxics may appear following a short period of exposure, while others may only appear after long-term exposure. “For these (and other) reasons, it is frequently very difficult to conclusively associate environmental levels and potentially linked public health impacts” (MDEQ, 2003). Additionally, supporting documents for the health assessment of diesel engine exhaust used in the development of EPA’s non-road rules acknowledge that “the assessment’s health hazard conclusions are based on exposure to exhaust from diesel engines built prior to the mid-1990s”...and “as new diesel engines with cleaner exhaust emissions replace existing engines, the applicability of the conclusions in this Health Assessment Document will need to be re-evaluated” (U.S. EPA, 2002).

In addition to the uncertainty associated with the health risks of air toxics and PM<sub>2.5</sub>, issues related to quantifying impacts and the lack of standards have been raised. There are no NAAQS for air toxics and methods for quantifying impacts are subject to scientific debate. Unlike smokestack testing for point sources, it is not feasible to directly measure mobile source emissions, given the number of tailpipes that would constitute any inventory. Modeling approaches, however, can provide a tool to assess project impacts and to compare the relative merits of various control strategies or project alternatives. These are the pollutant burden analyses discussed in the following sections. But, although transportation and air quality models are constantly being tested and improved, credible models to calculate the dispersion of PM<sub>2.5</sub> and air toxics, and the resulting concentrations at any given point, have not been adopted for regulatory use.

The limitations preclude at this time the DIFT project from conducting a quantitative pass/fail comparison to standards for air toxics and PM<sub>2.5</sub>. Nevertheless, in order to gain some insights into the relative

differences among the alternatives with regard to air toxics and PM<sub>2.5</sub>, this document proposes estimating the pollutant burdens of the proposed alternatives both on terminal sites and on the surrounding roadway network. This approach is consistent with the requirements of 40 CFR 1502.22 and 1502.24.

## 7.0 Terminal Pollutant Burden Estimates

For each terminal, an area has been defined that covers the existing yard and any area of potential acquisition (Figures 1, 2, 3 and 4). Within these areas the total pollution emitted will be calculated for 2004, 2015, and 2025. The estimate will cover terminal activity, travel on streets that would be incorporated into a terminal (for example John Kronk), and activity on land that would be incorporated into a terminal. This approach allows comparison of the burdens generated by the alternatives for a common geographic area. More specifically, the pollution estimates will address:

- Visitor and employee traffic on the rail yard.
- Truck activity on the rail yard related to container delivery and pickup.
- Container handling on the yard - moving containers between delivery points and trains.
- Locomotive idling and movement on the yard.
- Fugitive dust from paved and unpaved yard areas.
- Vehicular travel on sites of businesses to be acquired.
- Vehicular travel on streets that would no longer be public streets with project development: John Kronk and a section of Lonyo.
- Fugitive dust from business sites and the public streets that would be closed.

The pollutant burden will be calculated for the following NAAQS pollutants and precursors: carbon monoxide (CO), hydrocarbons (HC), oxides of nitrogen (NO<sub>x</sub>), particulates of 10 microns or smaller (PM<sub>10</sub>), particulates of 2.5 microns or smaller (PM<sub>2.5</sub>), and volatile organic compounds (VOC). It will likewise be performed for the following air toxics: benzene, acetaldehyde, formaldehyde, 1,3-butadiene, acrolein, and diesel particulate matter.

This information will be estimated for both on-road and non-road mobile sources. The emission factors (in grams/mile) for on-road sources (cars and trucks) will come from MOBILE6.2. An emission factor for an average speed of 2.5 miles per hour will be used to estimate idling conditions on the terminal yards because MOBILE6.2 does not generate emission factors for vehicle idling. The burden for on-road activity will be based on vehicle miles of travel on the site.

Emission factors for CO, NO<sub>x</sub>, HC and PM for locomotives will be obtained from EPA's 1997 "Emission Factors for Locomotives" (EPA420-F-97-051). PM<sub>2.5</sub> emissions estimates will be derived using a PM<sub>2.5</sub> fraction of 0.97 as recommended by EPA in April 2004. VOC emissions estimates will be calculated using a 1.005 VOC/HC ratio. Emission factors for locomotive air toxics will be derived



Figure 1  
Livorno-Junction  
Terminal  
Air Quality Impact  
Analysis Study Area

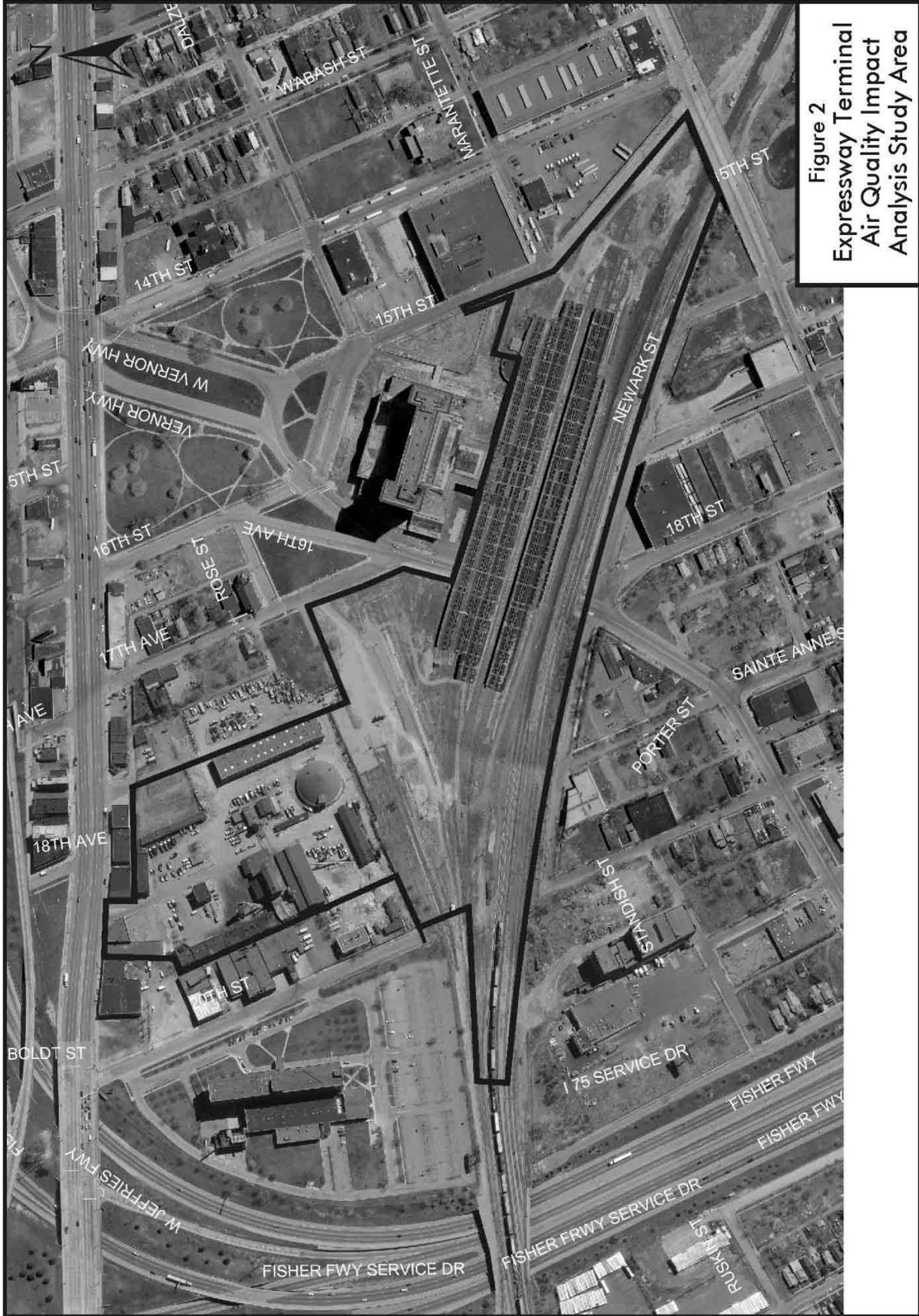


Figure 2  
 Expressway Terminal  
 Air Quality Impact  
 Analysis Study Area

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Figure 3  
 CP Oak Terminal  
 Air Quality Impact  
 Analysis Study Area

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from the 1999 National Toxics Inventory technical documents. A load factor (representing the portion of the engine's horsepower needed for an activity) will be applied to the emission factors in order to obtain realistic emission estimates. The burden for locomotives will be based on the number of hours of operation on the site. Non-road mobile sources in addition to locomotives include terminal tractors, hostlers, and cranes loading and unloading trailers from the trains. Emissions from terminal tractors, hostlers and cranes will be estimated using *Exhaust and Crankcase Emission Factors for Nonroad Engine Modeling – Compression-Ignition*, EPA420-P-04-009, April 2004 and other technical guidance that support EPA's NONROAD model. Emission factors for non-road air toxics will be taken from technical documents supporting EPA's 1999 National Toxics Inventory, in consultation with EPA and SEMCOG.

The burden analysis will include estimates of emission sources located outside the terminal areas, but within the expansion areas. For example, traffic on the property of businesses that would be relocated would be added to the base-year total, but subtracted from the build alternatives (when such facilities are removed by an alternative). And, the emissions from roads that will be closed and included within the footprint of a terminal yard would similarly be included in the base year, but subtracted from the alternatives that close them. Examples are John Kronk and Lonyo.

The burden analysis for PM<sub>2.5</sub> will consider fugitive dust emissions. Project-related dust emissions are important in this analysis because the build alternatives are expected to reduce PM emissions by covering unpaved roads and exposed soil in terminal areas. Road/soil dust tends to have a lower percentage of PM<sub>2.5</sub> than diesel particulate matter; however, the sheer size of the unpaved terminal areas (e.g., at the Livernois-Junction Yard) represents a significant part of the total PM emissions (including PM<sub>2.5</sub>) that could be eliminated or minimized by paving these areas. In the case of the Livernois-Junction Yard, analyses may show that PM<sub>2.5</sub> from road/soil dust to be *more significant* to DIFT neighbors because road/soil emissions are cool and not as buoyant as diesel emissions so they tend to disperse over a more localized area, albeit in higher concentrations. Diesel emissions are hot and buoyant so they tend to rise in the atmosphere and disperse over a wider area in relatively lower concentrations. EPA's "Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1: Stationary Point and Area Sources" (EPA 1995, revised December 2003) will be the source of emission factors for fugitive dust emissions. The approximate acreage of unpaved area on each terminal will be calculated using GIS mapping tools. The estimates will include individual emission calculations for roads as well as unpaved yards, as appropriate.

## 8.0 Public Roadway Pollutant Burden Estimates

A network of local roads near each terminal that could be influenced by the project will be identified. These include roads that would be used by new DIFT traffic, that would have traffic changes due to the closure of Lonyo, or that would experience changes in auto and truck traffic as businesses are relocated to make way for the DIFT.

The traffic changes resulting from each alternative are summarized as follows:

- Alternative 1, No Action
  - ✓ Background auto and truck traffic will grow 25 percent between 2000 and 2025.
- Alternative 2, Improve/ Expand Existing Terminals
  - ✓ Livernois-Junction Yard – DIFT trucks will use either Wyoming or Livernois. (Under one scenario that maintains the Dix/Waterman/Vernor gate, traffic could use Livernois/Dragon south of Dix, but in other scenarios, all traffic would be to/from the north on Livernois and connect with and I-94.)

- ✓ Expressway Terminal – Traffic would link directly to Michigan Avenue, rather than using 14th Street.
- ✓ Oak Terminal – A new entrance direct to Evergreen and the ramps linking to I-96 would be created, ending use of the Southfield freeway frontage roads and such local streets as Artesian.
- ✓ Moterm Terminal – Traffic would be eliminated from the residential areas served by Fair and Chesterfield Streets as the intermodal yard will be accessed directly south of 8 Mile Road into the State Fairgrounds.
- Alternative 3, Consolidate – DIFT truck traffic would use Wyoming and Livernois (north of the yard gate). Local traffic on Lonyo would shift to Central and to a lesser extent Wyoming, when Lonyo is closed at the rail yard boundaries. Intermodal traffic would be eliminated at other terminals.
- Alternative 4, Composite – The approach would be similar to Alternative 3 at the Livernois-Junction yard and the same as Alternative 2 at Moterm, as CN operations would not be consolidated, but expand into the State Fairgrounds.

Using available information on background traffic levels, traffic shifts will be calculated, with new DIFT traffic added, and traffic from displaced businesses removed. The vehicle miles of travel will be available by link, and using estimated speeds on each link, the pollutant burden will be calculated. Burden estimates will include NAAQS pollutants, plus diesel particulate matter and the previously identified air toxics. These estimates will be aggregated for autos and trucks, and then combined to get totals for each terminal area under each 2025 scenario. Data will be expressed in tons per year.

## 9.0 Air Quality Conformity

The Clean Air Act requires each state to have a *State Implementation Plan* (SIP) to demonstrate how it will attain and/or maintain federal air quality standards. SEMCOG, the Southeast Michigan Council of Governments, collaborates with the Air Quality Division of the Michigan Department of Environmental Quality (DEQ) on the work needed to prepare and/or update a SIP. SEMCOG is responsible for mobile source (vehicular) emissions in Southeast Michigan. SEMCOG's *2030 Regional Transportation Plan* (RTP) must undergo a quantitative analysis demonstrating that emissions levels associated with implementing planned projects are below designated emissions level limits (budgets) set forth in the SIP. In so doing, SEMCOG is managing and facilitating the transportation air quality conformity process in Southeast Michigan. The DIFT project is subject to air quality transportation conformity review through SEMCOG's inclusion of any DIFT roadway improvements in its RTP.

Air quality conformity analyses for mobile sources in Southeast Michigan currently involve two major pollutants: ozone (and its precursors, volatile organic compounds and nitrogen oxides) and carbon monoxide (CO). A new standard will require such analyses for PM<sub>2.5</sub> by April 2006.

Currently, transportation conformity analyses are required for all regions designated by EPA as either nonattainment or maintenance for the one-hour ozone, CO, or PM<sub>10</sub> standards. Conformity requirements for the two new NAAQS - eight-hour ozone and PM<sub>2.5</sub> - are now being established. The DEIS will report on the attainment status of the region, as follows:

**One-hour Ozone** - In 1995, the region was redesignated from nonattainment to maintenance for the one-hour ozone standard. At that time, a maintenance plan was developed establishing emissions budgets for the two precursors of ozone: volatile organic compounds (VOCs) and nitrogen oxides (NO<sub>x</sub>). In order for a conformity determination to be made with regard to the one-hour ozone standard, VOCs emissions

cannot exceed the mobile source emissions budgets of 218 tons/day for years 2004-2014, and 173 tons/day for years 2015 and beyond. For NO<sub>x</sub>, emissions cannot exceed the budget of 413 tons/day in any analysis year. The 8-hour standard (see below) now supplants the 1-hour standard, but until an 8-hour emissions budget is established, conformity will be the same as for 1-hour.

**Eight-hour ozone** - On April 15, 2004, (effective June 15, 2004) the EPA officially designated Southeast Michigan a moderate nonattainment area for the 8-hour ozone standard. On September 15, 2004, EPA “bumped down” the designation to marginal, which means that the area must attain the new standard by June 15, 2007. A SIP is currently being developed to address this issue. As noted, for the time being the test of 8-hour conformity remains the same as that used to demonstrate conformity for one hour.

**Carbon monoxide** - In 1999, the region was redesignated from nonattainment to maintenance for CO. Similar to ozone, a positive conformity determination for CO requires that emissions in any future year remain at or below the approved mobile source emissions budget of 3843 tons/day. On January 28, 2005, (effective March 28, 2005) EPA approved a revised CO budget of 1946 tons /day.

**PM<sub>10</sub>** - As Southeast Michigan currently meets the NAAQS for this pollutant, a regional conformity analysis is not required.

**PM<sub>2.5</sub>** - EPA designated seven counties in Southeast Michigan as nonattainment for this new standard December 15, 2004. Conformity determinations for PM<sub>2.5</sub> will be required by April 5, 2006.

## 10.0 Mitigation

The DIFT analysis will include a discussion of practical mitigation measures that would be considered to lessen air quality impacts, including from PM<sub>2.5</sub> and air toxics. Mitigation includes new technologies and strategies to reduce pollution from heavy-duty vehicles (trucks and locomotives) as well as off-road equipment. Some of the major technologies/strategies that will be evaluated are described below:

- Engine Idling Reduction Programs for trucks and locomotives, such as auxiliary power units for trucks and automatic shut-off devices for idling locomotives
- Use of electrified truck parking areas
- Use of alternative fuels for handling equipment, e.g. natural gas and hybrids

The railroads that will participate in the DIFT have expressed an interest in mitigation. In fact, CSX Corp. is a Charter Partner in the SmartWay Transport program, which is voluntary program that incorporates idle reduction, improved logistics management and other strategies to reduce pollution.

It is anticipated that the FEIS will contain agreements that mandate specific air quality mitigation measures, which will be defined as the project advances. Additionally, the paving of the Livernois-Junction Yard is part of the Alternatives 2, 3, and 4.

## 11.0 Technical Report

The DIFT Air Quality Impact Analysis Technical Report prepared for the DIFT EIS will include results from the above-stated methodology that characterize the communities around each terminal site. The

report will show the locations of residential areas, schools, day care facilities, parks, and hospitals relative to the DIFT terminals. The type of activities that would occur at rail yards that could impact these nearby facilities (100 to 300 meters away) will be discussed. An evaluation of the potential health effects on population is beyond the scope of this analysis. Nevertheless, to the extent the data will foster a productive discussion, the occurrence of asthma hospitalizations for sensitive age groups (i.e. the very young and/or seniors) compiled by the Michigan Department of Community Health will be included in the report. This discussion will recognize that use of such information does not allow conclusions to be drawn about a specific project or alternative.

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## **Appendix F**

# **Memorandum of Understanding between Railroads and MDOT**



## **DETROIT INTERMODAL FREIGHT TERMINAL PROJECT MEMORANDUM OF UNDERSTANDING**

### **A. Parties**

This Memorandum of Understanding (“Memorandum”), effective this \_\_\_\_\_ day of \_\_\_\_\_, 2005, by and between (i) the “DIFT Participants,” as many and such of the following entities that execute this Memorandum: Canadian National Railway Company (“CN”), Canadian Pacific Railway Company (“CPR”), Soo Line Railroad Company (“Soo”) (both CPR and Soo, individually and together, sometimes referred to as “CP”), Consolidated Rail Corporation (“Conrail”), CSX Intermodal (“CSXI”), CSX Transportation, Inc. (“CSXT”) (both CSXI and CSXT, individually and together, sometimes referred to as “CSX”), Norfolk Southern Railway Company (“NSR”), Triple Crown Services Company (“TCS”) (both NSR and TCS, individually and together, sometime referred to as “NS”) and (ii) the Michigan Department of Transportation (“MDOT”), (also individually, “Party”, and collectively, “Parties”).

### **B. Purpose/Steps**

The purpose of this Memorandum is to set forth the understandings and intentions of the Parties with respect to certain terms of the Detroit Intermodal Freight Terminal project (“DIFT”) and related issues more particularly described below.

The parties envision the following steps (as presented graphically on Attachment A): (i) the execution of this Memorandum, (ii) the publication of the Draft Environmental Impact Statement (“DEIS”) by MDOT, (iii) the determination by MDOT of a Preferred Alternative, (iv) a Pre-Development Plan Agreement to be executed by the Parties further refining the understandings and intention of the Parties, (v) the publication of the Final Environmental Impact Statement (“FEIS”) by MDOT, (iv) the signing of a Record of Decision (“ROD”), (vii) the preparation of a detailed DIFT Development Plan, and (viii) the execution of individual DIFT Implementation Agreements between MDOT and the individual DIFT Participants, as appropriate.

### **C. Legal Effect**

The following paragraphs are controlling in determining the legal effect of any part of this Memorandum.

The Parties expressly acknowledge that at this point in the pre-design and construction process all of the rights and obligations of each Party with respect to the other Parties and the DIFT have not been agreed to or determined and that in order to implement and complete the DIFT, further negotiation, agreement, and documentation, including selection of a Preferred Alternative, the publication of the FEIS, signing of the ROD, and development of a joint governance structure to coordinate and oversee the DIFT, will be required in a manner typical for preliminary engineering, final engineering and construction ventures of the size and scope contemplated.

As such, this Memorandum will serve only as a memorialization of the present understandings and intentions of the Parties with respect to the DIFT, which shall not be legally binding, but

shall be subject to further agreements by the Parties (as set forth generally in Section B). However, if the ROD is not signed by the federal government by December 31, 2006, this Memorandum shall automatically terminate.

Further, the Parties acknowledge that any financial commitment provided by MDOT in connection with the DIFT is subject to approval by various agencies including, without limitation, the State Transportation Commission, the State Administrative Board, the Attorney General (as to legality and form), Department of Civil Service, Department of Management and Budget, and the Federal Highway Administration and that no assurance can now be given that such approval will or will not be forthcoming regarding such commitment. MDOT will make every reasonable effort to ensure funding and completion of the DIFT. MDOT funds or assets that are utilized in the DIFT must be for a transportation purpose and provide public benefits. However, if MDOT does not obtain the necessary financial commitment or otherwise provide funds to advance the DIFT by December 31, 2007, this Memorandum shall automatically terminate.

#### **D. Project Description**

The purpose of the DIFT is to enhance the economic competitiveness of Southeast Michigan and the State by improving the rail intermodal transportation service capability and efficiencies for business, industry, and the military. The goal is to provide a regional facility, or facilities, owned and/or operated by one or more of the DIFT Participants, with sufficient capacity and interconnectivity to provide for existing and future intermodal demand and to reduce time, monetary costs and congestion to support the economic competitiveness of Southeastern Michigan. This will be done by providing necessary intermodal terminal capacity and by improving the related rail and highway infrastructure within Wayne and Oakland Counties to meet projected intermodal freight demand through 2025. The Parties will work together to:

- Develop new and expanded rail intermodal terminal capacity for intermodal operations of the Class I railroads and their corporate affiliates serving Southeastern Michigan.
- Make necessary rail infrastructure efficiency and capacity enhancements to facilitate intermodal rail freight train operations in Southeastern Michigan.
- Improve highway infrastructure to facilitate and improve the efficiency of trucking operations from and to the intermodal terminals.
- Secure public and private funding needed to complete the DIFT plans, as generally defined in the project's FEIS and ROD.

## **E. Background**

The DIFT has been in development for several years. The growth of U.S. intermodal traffic, the enormous influx of double-stack trains and marine containers, and the even more recent entry and rapid growth of rail-truckload initiatives have all raised questions about the adequacy of intermodal terminals to handle traffic increases and to do so efficiently.

In the 1980s, the railroads consolidated their intermodal service networks into fewer, larger hub terminals. Railroads saw an opportunity to consolidate enough volume in one location to justify dedicated intermodal train service and improve the efficiency of their terminals through mechanization and elimination of smaller inefficient terminals.

To respond to the challenge of providing adequate intermodal terminal capacity and in response to the Michigan Legislature's initiative to address intermodal transportation in the Greater Detroit Area, MDOT in 1993 and 1994 undertook a review. The results of that, and subsequent work, recognized that:

- Detroit is one of the top markets in the nation for intermodal freight (trailer or container loads moving by rail).
- Because of the auto industry, Detroit leads the nation in its use of carless or RoadRailer intermodal technology, i.e. a system wherein the truck trailer is placed directly on rail wheels and the trailer becomes an integral part of the rail train.
- One third of Detroit's intermodal traffic is trucked to and from other cities. This means that it travels by rail to Chicago, Toledo or Windsor, Ontario, for example, and then it is trucked to Detroit rather than arriving in Detroit directly by rail. Better intermodal service could result in a diversion of some of this intermodal activity to Detroit because of reduced transportation costs. This would eliminate some trucks from Michigan's roads which could reduce congestion, improve air quality, and help ease the need for added capacity on the roadway network.
- The improvement of the Detroit-Windsor rail tunnel and the construction of a new Port Huron-Sarnia rail tunnel enhances intermodal access to and from the Detroit area.

It is important to facilitate and enhance the movement of freight which, in turn, drives jobs and economic development growth in Southeast Michigan and plays a key role in national defense. It is also important to respect the quality of life of the residents in neighborhoods where terminals exist and may expand. In that regard, and consistent with the role of ensuring that business and industries involved in the freight transportation segment of the economy continue to have access to their markets, MDOT decided in December 2001 to prepare an Environmental Impact Statement (EIS) to evaluate alternatives to improve intermodal transportation.

The DIFT is proposed for the enhanced development of intermodal terminals of the Class I railroads (CN, CP, CSXT, and NS) and/or their corporate affiliates serving Southeast Michigan and nearby rail and highway infrastructure to provide improved rail intermodal service to

business, industry, and the military in the State. Presently, there are four intermodal terminals in, or in close proximity to, Southwest Detroit: the separate NS and CSX terminals at Detroit-Livernois Yard, and NS's terminals in Delray and Melvindale. NS also has a fourth terminal located at Willow Run, located predominantly in Washtenaw County. There is another intermodal terminal in Wayne County, CP/Oak terminal, located in the northwest corner of the intersection of I-96 and the Southfield Freeway. The CN/Moterm intermodal terminal is on the Wayne County / Oakland County border north of 8 Mile Road between I-75 and Woodward Ave. CP/Expressway operated for four years at a terminal near the Michigan Central Depot. CP/Expressway service was temporarily suspended in June 2004.

MDOT has been in the process of developing a Draft Environmental Impact Statement on four alternatives: Alternative 1, No Action; Alternative 2, Improve/Expand Existing Terminals; Alternative 3, Consolidation of all four Class I Railroads' intermodal activity (at the Livernois-Junction Yard area); and Alternative 4, Composite Option which involves consolidation of intermodal activity of CSX, NS and CP at the Livernois-Junction Yard area and CN remaining at its Moterm terminal.<sup>6</sup> In reviewing the various improvements that might be associated with the four alternatives, and various development scenarios and options possible with regard to those alternatives, MDOT has consulted with representatives of the DIFT Participants. The DIFT Participants support the DIFT concept as described in Section D; are willing to continue to consult with MDOT as MDOT studies and reviews the four alternatives (i) to complete and promulgate its DEIS; (ii) to select a Preferred Alternative; and, (iii) to proceed to a Final Environmental Impact Statement and the Record of Decision; however, the Parties acknowledge that a Preferred Alternative has not been selected by MDOT and approval of any specific alternative by any DIFT Participant cannot occur until after such selection, if ever, and no such approval is made or implied by this Memorandum.

#### **F. Local Area Considerations/Governance**

Each of the Parties to this Memorandum will meet at least quarterly once the DIFT's Record of Decision embracing the Final Environmental Impact Statement is signed by the federal government to discuss the implementation of the course approved in the ROD, particularly those items which affect the local area surrounding the terminal(s) at which investments will be made.

A public-private governance structure will be formed among the Parties who execute an Implementation Agreement to oversee the implementation, operation, and maintenance of the DIFT over the life of the project.

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<sup>6</sup> At this time, it is not CN's intent to relocate its intermodal activity to the Livernois-Junction Yard area.

### **G. Terms of MDOT's Participation**

Following approvals by the agencies identified in Section C, MDOT expects to participate in the DIFT upon the following general terms:

1. MDOT will complete the FEIS and ROD process and meet any other requirements necessary to qualify for project approval and funding, subject to the cooperation of the DIFT Participants with MDOT in the completion of these requirements.
2. MDOT will make all necessary applications and take other necessary steps to secure federal and state approval and funding for the DIFT, subject to the cooperation of the DIFT Participants with MDOT in securing state and federal approval and funding.
3. MDOT will establish the necessary loan/grant programs and procedures to enable awarding of loans/grants to DIFT Participants for development of elements of the DIFT.
4. MDOT, in collaboration with and subject to the approval of the DIFT Participants, will prepare the DIFT Development Plan.

### **H. Terms of DIFT Participants' Participation**

The DIFT Participants, which may at the option of a specific DIFT Participant include that company's wholly-owned railroad or non-railroad subsidiaries, expect to participate in the DIFT upon the following general terms and as more fully delineated in a Pre-Development Plan Agreement to be negotiated between the Parties based on selection of a Preferred Alternative to be documented in the FEIS and ROD:

1. DIFT implementation will include only those projects that are described in the FEIS, ROD, and the subsequently-approved DIFT Development Plan. The primary goal of the FEIS and the DIFT Development Plan is to provide the DIFT Participants with individual intermodal facilities and related infrastructure improvements satisfactorily sized, conditioned, and located for their individual long-term needs which will improve intermodal rail movement through the region. The FEIS and the DIFT Development Plan will include the following types of projects:
  - a. DIFT Intermodal Facilities: The construction of new facilities and the improvement and expansion of existing facilities in the Detroit area for the transfer of truck trailers, including RoadRailers, and containers between rail and highway modes of transportation.
  - b. DIFT Rail Access Improvements: Improvements to existing railroad lines in the general vicinity of the DIFT Intermodal Facilities to facilitate efficient rail access and enhance overall intermodal rail movement through the region.

- c. DIFT Road Access Improvements: New public roads and/or improvements to existing public roads linking the DIFT Intermodal Facilities to other public highways.
  - d. DIFT Rail Yard Relocations: The relocation, replacement, or modification of existing non-intermodal facilities within the Livernois-Junction Yard terminal area owned by Conrail, or other DIFT Participants, as needed to accommodate the DIFT Intermodal Facilities. The DIFT Rail Yard Relocations shall provide capacity and capability at least equal to the existing facilities being displaced by the DIFT Intermodal Facilities.
2. The DIFT Development Plan will be a more-detailed version of the FEIS Preferred Alternative Engineering Report. Its preparation shall be financed by MDOT, in one or more drawings, plans, and/or renderings to be prepared by MDOT and the DIFT Participants together; provided, however, that each DIFT Participant will bear the respective costs of its review and comment in the preparation of the Plan. Each component of the DIFT Development Plan, with the exception of the DIFT Road Access Improvements, will be allocated on the DIFT Development Plan to a specific DIFT Participant(s). The DIFT Development Plan shall not be considered complete and valid until it is approved in writing by each DIFT Participant.
  3. With regard to DIFT Rail Yard Relocations, the fair market value for property belonging to DIFT Participants that may be acquired by MDOT for DIFT consistent with the DIFT Development Plan will be established by mutual agreement of MDOT and the applicable DIFT Participant, using an appraiser mutually agreed to from MDOT's standing list of approved appraisers and using professional independent appraisal techniques and considering the highest and best use for the property, pursuant to the provisions and requirements of Michigan law and the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, 42 U.S.C. §4601 et seq. ("URAA") and regulations promulgated pursuant thereto. The valuation applied shall be exclusive of existing non-intermodal facilities if the existing non-intermodal facilities are to be replaced as part of DIFT at no cost to the owner.
  4. The lease rate for property that may be acquired by MDOT for DIFT consistent with the DIFT Development Plan and leased to a DIFT Participant, will be established by mutual agreement of MDOT and the DIFT Participant, using an appraiser mutually agreed to from MDOT's standing list of approved appraisers and using professional independent appraisal techniques and considering the highest and best use for the property, pursuant to the provisions and requirements of Michigan law and the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, 42 U.S.C. §4601 et seq. ("URAA") and regulations promulgated pursuant thereto; provided, however, that (i) the lease rate is to be based upon the land valuation only, without improvements; (ii) the lease rate for all property to become part of the DIFT facilities at or near the Livernois-Junction Yard shall be based on the fair market value of the Livernois-Junction Yard property; and, (iii) no property will be leased to any DIFT Participant for an amount per acre less than the per acre rental rate applied to the Livernois-Junction Yard property.

5. In order to receive public funding, each DIFT Participant will, following the approval of the DIFT Development Plan, enter into a separate agreement (“DIFT Implementation Agreement”) with MDOT to cover the construction cost sharing, construction schedule, operation, maintenance, and ownership of those portions of the DIFT Development Plan allocated to it or on its property. No DIFT Participant is required to enter into a DIFT Implementation Agreement, but each agrees that it will not unreasonably prevent another DIFT Participant from progressing with MDOT its individual portions of the DIFT Development Plan.
6. In the case in which DIFT Alternative 2, 3 or 4 is designated in the FEIS and the ROD as the Preferred Alternative, and except where a DIFT Participant determines to self-fund its own property improvements, the DIFT Pre-Development Plan Agreement will generally include the following provisions and/or address the following issues:
  - a. Property acquisition cost, construction cost, ownership and timetables of DIFT Intermodal Facilities:
    - (i) Subject to the appropriation of sufficient funds, MDOT will, at its sole cost and expense, acquire and clear for construction all property not owned by any DIFT Participant that is required for a DIFT Intermodal Facility as defined by the DIFT Development Plan. Such property will then be leased to the DIFT Participant by MDOT at a lease rate based on the fair market value of the adjoining railroad terminal property determined in accordance with paragraph H.4.
    - (ii) MDOT and the DIFT Participants will share in: (a) paving-related construction cost; and, (b) the other construction cost of the DIFT Intermodal Facilities allocated to the various DIFT Participants.
    - (iii) Each DIFT Intermodal Facility will be solely controlled, operated, and maintained by the DIFT Participant to which it is allocated. Subsequent to the completion of additions and improvements and at its discretion and expense, the DIFT Participant may make modifications to the DIFT Intermodal Facility and may lease or sublease the DIFT Intermodal Facility to other parties. Nevertheless, for any property leased by MDOT to the DIFT Participant, MDOT concurrence will be required before the property is subleased, which concurrence will not be unreasonably withheld.
    - (iv) The timetables for the type of work covered by this subsection will be as provided for in the DIFT Development Plan, which will follow approval of the DIFT Record of Decision.
  - b. Construction cost, ownership, and timetables of DIFT Road Access Improvements, DIFT Rail Access Improvements, and DIFT Rail Yard Relocations:
    - (i) DIFT Road Access Improvements: MDOT will be responsible for securing all funds (with the exception of the Central Avenue underpass) from non-DIFT Participant sources for all construction and property acquisition cost of the DIFT Road Access Improvements. MDOT or local road agencies will own and maintain the DIFT Road Access Improvements as public roads.

- (ii) DIFT Rail Access Improvements: MDOT and the DIFT Participants will share in the construction cost of the DIFT Rail Access Improvements allocated to the various DIFT Participants, which allocation will be negotiated for each such improvement. The DIFT Participant who owns or leases the property to which a specific DIFT Rail Access Improvement is allocated shall own and maintain that DIFT Rail Access Improvement.
    - (iii) DIFT Rail Yard Relocations: Subject to the appropriation of sufficient funds, MDOT will fully fund all construction and property acquisition cost for DIFT Rail Yard Relocations depicted on the DIFT Development Plan. The DIFT Participant who owns or leases the property to which a specific DIFT Rail Yard Relocation is allocated shall own and maintain that DIFT Rail Yard Relocation and control its use consistent with the lease agreement with MDOT.
    - (iv) The timetables for the type of work covered by this subsection will be as provided for in the DIFT Development Plan, which will follow approval of the DIFT Record of Decision.
  - c. If the DIFT Development Plan includes an expanded Central Avenue underpass
    - (i) MDOT and the DIFT Participants will share in the cost of the Central Avenue underpass if the DIFT Participant is (a) located at the Livernois-Junction Yard terminal in its current form; or, (b) located north of John Kronk Street. The Parties have not yet agreed upon their respective shares of the cost of the expansion of the Central Avenue underpass.
    - (ii) The timetable for this work will be as provided for in the DIFT Development Plan, which will follow approval of the DIFT Record of Decision.
  - d. Certain trackage rights may be necessary to carry out the improvements in this section. Where so required, DIFT Participants will, subject to STB authorization, negotiate bilateral agreements for the movements involved. Such agreements, subject to the provisions of confidentiality agreements, will be incorporated into the DIFT Development Plan and will also address needed capacity enhancement and/or operating issues required to accommodate such trackage rights requirements.
- 7. In the case in which the DIFT FEIS and ROD designate either Alternative 3 or Alternative 4 as the Preferred Alternative, the DIFT Pre-Development Plan Agreement will generally include the following provisions and/or address the following issues:
  - a. Conrail's agreement to negotiate a trackage rights agreement with CN and/or CP, subject to STB authorization, to connect the existing CN and/or CP railroad lines with the DIFT Intermodal Facility to be allocated to CN and/or CP. The agreement will include terms customary in trackage rights agreements and provide for the payment of trackage rights fees reasonable and customary for such movements.
  - b. Property acquisition cost and ownership of DIFT Intermodal Facilities:
    - (i) If Conrail property is needed for a DIFT Intermodal Facility to be allocated to CN and/or CP, MDOT will pay Conrail an amount per acre equal to the Livernois fair market value determined in accordance with paragraph H.3.

MDOT will then lease the property to CN and/or CP at a lease rate based on the Livernois-Junction Yard fair market value as provided in paragraph H.4.

- (ii) If Conrail property is needed for a DIFT Intermodal Facility to be allocated to CSX or NS, Conrail, CSX and/or NS, as appropriate and/or applicable, will agree to arrange for the property to be sold, transferred, or exchanged by Conrail to CSX or NS, as applicable, for an amount per acre equal to the Livernois-Junction Yard fair market value.

- 8. If an applicable DIFT Implementation Agreement calls for consolidating at the Livernois-Junction Yard area CN and/or CP intermodal operations, then MDOT will establish [a] Michigan Rail Infrastructure Development Fund[s], covering the reimbursement of certain qualified railroad and other investments, for such DIFT Participant[s] with intermodal facilities presently located at the Livernois-Junction Yard area. The details of such fund[s] will be more fully delineated in the Pre-Development Plan Agreement.

NOW, THEREFORE, it is the intent by and between the Parties hereto to be committed to partner together toward completing the DIFT planning as described, subject to the terms of future agreements between MDOT and the participating DIFT Participants, to continue this partnership as deemed mutually beneficial, and to move forward to enhance the competitiveness of Southeast Michigan and the State by developing necessary intermodal rail terminal capacity and improving the supporting rail and highway infrastructure.

IN WITNESS HEREOF, the Parties have caused their respective officers, duly authorized, to execute this Memorandum to be effective as of the date first written above. This Memorandum may be executed in counterparts with separate execution pages and different effective dates for each of the DIFT Participants; provided, however, that each counterpart shall be executed by MDOT, and the date of MDOT's execution shall be the effective date of that counterpart.

**CANADIAN NATIONAL RAILWAY  
COMPANY**

BY: \_\_\_\_\_

TITLE: \_\_\_\_\_

**MICHIGAN DEPARTMENT  
OF TRANSPORTATION**

BY: \_\_\_\_\_

TITLE: \_\_\_\_\_

**CANADIAN PACIFIC RAILWAY  
COMPANY**

BY: \_\_\_\_\_

TITLE: \_\_\_\_\_

**CONSOLIDATED RAIL CORPORATION**

BY: \_\_\_\_\_

TITLE: \_\_\_\_\_

**CSX INTERMODAL**

BY: \_\_\_\_\_

TITLE: \_\_\_\_\_

**CSX TRANSPORTATION, INC.**

BY: \_\_\_\_\_

TITLE: \_\_\_\_\_

**NORFOLK SOUTHERN RAILWAY COMPANY**

BY: \_\_\_\_\_

TITLE: \_\_\_\_\_

**SOO LINE RAILROAD COMPANY**

BY: \_\_\_\_\_

TITLE: \_\_\_\_\_

**TRIPLE CROWN SERVICES COMPANY**

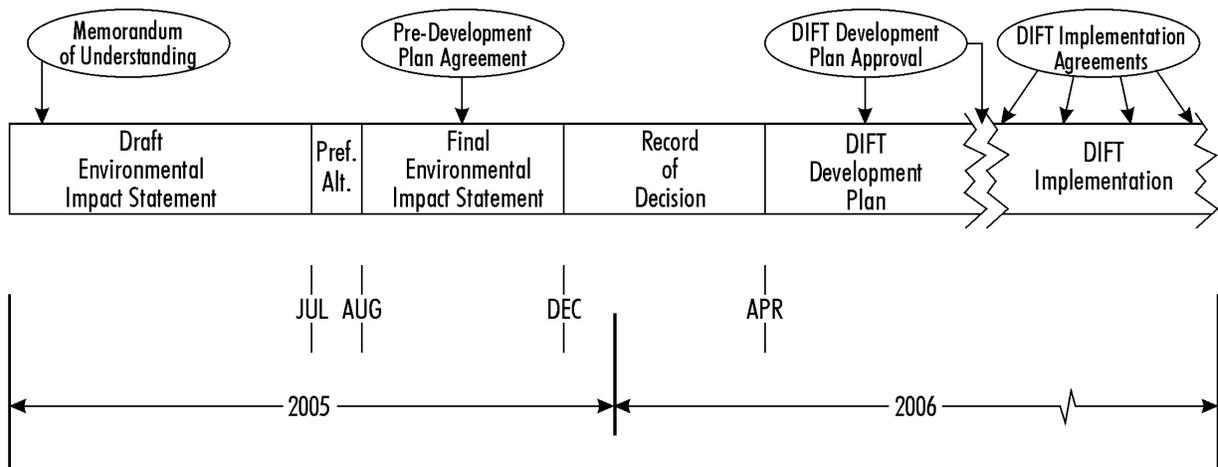
BY: \_\_\_\_\_

TITLE: \_\_\_\_\_

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# Attachment A

## DIFT Intermodal Freight Terminal Project MDOT/Class I Railroad Agreement Process



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