

**I-75 Oakland County Planning / Environmental Study  
CS 63174, JN 55776  
Draft Environmental Impact Statement  
Green Sheet: Project Mitigation Summary**

<i>Impact Category</i>	<i>Mitigation Measures</i>
<b>I. Social and Economic Environment</b>	
a. Fire Hydrant Access	MDOT will consult with local fire departments during the design phase to ensure adequate placement of and access to fire hydrants in locations where noise walls are to be constructed.
b. Visual Effects	Noise wall construction and construction materials will be discussed with the affected public in the vicinity of potential construction.
<b>II. Natural Environment</b>	
a. Noise	Analysis finds 17 individual reasonable and feasible noise walls totaling 4.3 miles in length (see Table 4-14).
b. Wetlands	0.41 acres of impacted wetlands in the Square Lake Road Interchange will be replaced by 0.61 acres of wetlands in Armada Township in Macomb County. A permit will be obtained from the Michigan Department of Environmental Quality for this compensatory wetland mitigation. A Wetland Mitigation Plan will be included in the Final EIS for the project.
c. Tree Removal/ Clearing/Landscaping	Mature trees will be preserved within MDOT right-of-way (principally at fencelines), where safety requirements are met. 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 highway runoff, storm water management facilities will include detention basins and grassed channels or swales to reduce the concentration of road contaminants reaching receiving bodies of water. Ditch check dams will be installed to control runoff velocities. Storm water management will be incorporated into final roadway design.  The project will include separation of MDOT storm water south of 12 Mile Road from the combined sewer system that now carries this storm water.
<b>III. Hazardous / Contaminated Materials</b>	
a. Contaminated Sites	A <i>Project Area Contamination Survey</i> has been completed. One site has been identified for a Phase II survey, prior to right-of-way acquisition.
<b>IV. Construction</b>	
a. Maintenance of Traffic	Two lanes of traffic will be maintained in both directions at all times on I-75.
b. 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.
c. Wetlands	Delineated wetlands are to be included on construction plans sheets, so they can be flagged for avoidance during construction.
d. Parks	Reconstruction of the service drive adjacent to Maddock Park may be necessary. No grading permit will be obtained for the park.

## **SECTION 5**

### **MITIGATION OF IMPACTS**

The goal of mitigation measures is to preserve, to the greatest extent possible, existing neighborhoods, land use, and natural resources, while improving transportation. Although some adverse impacts are unavoidable, the Michigan Department of Transportation (MDOT), through route location, design, environmental, and construction processes, takes precautions to protect as many social and environmental systems as possible. Construction activities that include the mitigation measures discussed below are those contained in the current MDOT “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.

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

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

*Compliance with State and Federal Laws* – 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 and businesses 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 that will implement the statutory and constitutional requirements. 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* – MDOT is required by statute to relocate eligible displaced businesses. MDOT has specific programs that will implement the statutory and constitutional requirements. Appropriate measures will be taken to ensure that all eligible displaced businesses are advised of the rights and benefits available and courses of action open to them.

*Purchasing Property* - The Michigan Department of Transportation 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, with a reasonable time allowed to find a buyer, 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 Noise Walls**

Noise mitigation is detailed in Table 4-14. If the project proceeds to design, provisions will be made for fire hydrant access through noise walls. Discussions with all adjacent municipalities will be necessary to identify these locations and other locations where access through the wall may be necessary. Where there are extensive lengths of noise wall, locked panels are sometimes provided to allow emergency personnel access through the walls.

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

Accelerated sedimentation caused by highway 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 standard erosion control items to be included on design plans to prevent erosion and sedimentation. 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 or 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.

No work will be done in the channels of the River Rouge, or other water courses during periods of seasonally high water, except as necessary to prevent erosion.

All construction operations will be confined to the highway right-of-way limits or acquired easements.

Areas disturbed by construction activities will be stabilized and vegetated as soon as possible during the construction period in order to control erosion. Road fill slopes, ditches, and other raw areas draining directly into the River Rouge will be protected with riprap (up to three feet above the ordinary high water mark), sod, seed and mulch, or other measures, as necessary to prevent erosion.

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.

Protection of storm sewer inlets will be done to prevent sediment from entering the storm sewer system.

The contractor shall have the capability of performing seeding and mulching at locations within 500 feet of any wetlands, lakes, streams, and drains within 24 hours of being directed to perform such work by the project engineer.

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 River, Stream and Drain Crossings**

Bridge and culvert work at river, stream, and drain locations will require construction staging and additional protection items to minimize impacts on the water course. The following are general mitigation items designed to reduce impacts at water crossings. The design plans will show all specific controls for each watercourse.

1. All work below the ordinary high water mark of any river, stream or drain will require permits from MDEQ and/or the U.S. Army Corps of Engineers. All permit conditions will be adhered to during construction. Permit conditions may include fish spawning protection dates where no work can occur in the water unless it is isolated behind a cofferdam installed prior to the start of the protection date.
2. All construction operations adjacent to watercourses will include appropriate soil erosion and sedimentation controls (Section 5.3).
3. All construction activities will be isolated from the flowing watercourse where possible. This can be done by installing a cofferdam (steel sheeting or sand bags) around the construction area. Another method may be to construct a temporary channel to relocate the existing watercourse while construction takes place at the existing watercourse location. The temporary channel and proposed new channel shall be stabilized prior to water flow being diverted into it.

## **5.5 Environmental Permits**

Proposed construction activities will involve the need for permits in several areas. Impacts on bodies of water such as lakes, streams, drains and wetlands will require permits under federal and state law:

### **Federal**

- Executive Order 11990
- 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 states that when federal funds are used on a project, 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 five acres 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.

Section 404 of the Clean Water Act requires a permit from MDEQ (acting for the U.S. Army Corps of Engineers) for the excavation and discharge of dredged and/or fill material in "waters of the United States," including wetlands. Section 401 Water Quality Certification from MDEQ is required prior to the issuance of the Section 404 permit.

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

- Part 31, Water Resource Protection
- Part 55, Air Pollution Control
- Part 301, Inland Lakes and Streams
- Part 303, Wetland Protection

Parts 31 and 301 of Michigan Act 451 are administered by the MDEQ. A Part 31 permit (which is reviewed and issued with the Part 301 application) is needed to place fill material within any part of a floodplain with a drainage area of two square miles or more. A Part 301 permit is required for any work below the ordinary high water mark of any inland lake, stream, or drain including the placement of any permanent or temporary river or stream structure.

A Part 55 air quality permit is required for any bituminous or Portland cement concrete proportioning plant or crusher.

A Part 303 wetland permit is required for any wetland disturbance, permanent, as well as temporary. The Part 303 permit is reviewed and issued with the Part 301 permit.

Final mitigation measures proposed in areas requiring the above permits will be developed in consultation with the appropriate agencies, and will be included in the permit application(s).

## **5.6 Existing Vegetation**

The existing natural and ornamental vegetative cover will be retained wherever and whenever possible within the 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 MDOT 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 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.

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

Surplus or unsuitable material generated by the removal of structures, trees, etc., will be disposed 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.

## **5.8 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 roadside ditch, watercourse, or storm sewer. Although siltation of

such watercourses from this intercepted water is rare, it will be controlled, when necessary, by the placement of material around the edge drainpipe to filter fine material.

## **5.9 Surface Water Quality**

Adequate soil erosion and sedimentation control measures will be implemented. Rural drainage with grass slopes and swales will be maintained where possible, subject to the results of the ongoing drainage analysis. A combination of detention basins, sediment basins and vegetated ditches will be used to promote infiltration, thereby reducing the potential impacts on the streams from added runoff and associated pollutants, including deicing salts, heavy metals, and pesticides.

In the depressed section of I-75 between M-1 (8 Mile Road) and 12 Mile Road the storm water from I-75 flows into the combined sewer system that serves the area. With the project the storm water from I-75 will be separated from the existing system. By providing its own system for I-75 storm water, MDOT will positively affect water quality by: 1) reducing flow in the combined sewer system so that overflows of sewage into the Red Run Drain occur less frequently; and, 2) reducing flow to the Detroit wastewater treatment plant, so that facility treats less storm water.

## **5.10 Maintaining Traffic During Construction**

The disruption of traffic in the construction area will be minimized to the extent possible. Two lanes will be kept open in each direction on I-75 at all times. All construction areas and altered traffic patterns will be clearly marked during the construction phase. A preliminary construction staging program that calls for part-width construction 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.

Part-width construction is applicable where the road is widened, such as with this project. But, as total reconstruction of I-75 is planned to coincide with the lane addition, the entire road width will be closed at one time or another. In the depressed section, bridges will be replaced. This means there will be brief periods when one side of the freeway will have to be totally closed as bridge beams are removed and new ones put in place. The general process in the depressed section would be:

- Excavate for and construct the new lane and outside shoulder on side 1 of the freeway.
- Make simultaneous improvements to service drives.
- Construct the new bridges over side 1.
- Divert all traffic to side 1, which would have 4 lanes, two in each direction, plus adequate lateral clearances.
- Construct the bridges on side 2.
- Use service drives as necessary to detour traffic. All service drives can carry two lanes of traffic.

In the at-grade/elevated section from 12 Mile Road north the process would be:

- The bridges would be widened to the inside on one side of the freeway.
- The inside lane addition would be made on that side.
- All traffic would shift to that side of the road.
- The other side of the road would be completely reconstructed with the bridge widening and lane addition.
- Finally, traffic would shift to the fully constructed side and the original side would be reconstructed.

Major detours are not planned. The service drives will be available south of 12 Mile Road.

It is anticipated that multiple construction seasons will be needed to complete the project. The number of years is dependent on funding availability. Construction phasing involves a number of factors, beyond funding availability, such as: length of a segment; type of proposed facility (bridges, ramps, mainline); political jurisdictions; and, related projects. Drainage patterns could also influence the definition of final segments. Other important considerations are the level of congestion of project segments and the cost effectiveness of constructing these segments.

The section with the greatest need from the standpoint of congestion, capacity, and safety is north of I-696. The proposed ramp braiding in that location would have a positive effect on the entire northbound section of I-75 from north of 8 Mile Road to near 12 Mile Road. Therefore, the recommendation is to construct the ramp braiding first. Congestion analyses find that the next steps would be to work from the south to the north along the corridor. If the availability of funding remains a significant limitation, an option would be to build northern sections first, as these sections have lower costs. On a cost basis, a logical first step could be construction of I-75 between the I-75/M-59 interchange project and the Crooks / Long Lake project.

It is anticipated that (based on available funding) special transit services could be initiated in advance of the construction period. Existing MDOT and SEMCOG rideshare programs would be enhanced, with particular emphasis on major corridor employers.

### **5.11 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.

### **5.12 Construction Noise and Vibration Impacts**

Construction noise 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 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 being 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.

### **5.13 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 30 calendar days for plants with an active MDEQ permit (or 60 calendar days for plants not previously permitted in Michigan) prior to the plant being installed. For proposed plant sites in Wayne County, the contractor should apply directly to the Wayne County Department of Environment, Air Quality Management Division.

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.

## **5.14 Wetland Mitigation**

Wetland mitigation will conform to Executive Order 11990 and the Michigan Natural Resources and Environmental Protection Act (PA 451 of 1994, as amended), Part 303 – Wetland Protection, administered by MDEQ. Impacts to wetlands will require a permit under Part 303. Wetland mitigation adjacent to the study area is preferred by regulatory agencies so that replacement will occur as close to the impact as possible.

Delineated wetlands are all within, or contiguous to, the existing right-of-way of I-75. The No Build and GP alternatives would have no impacts on wetlands. The HOV Alternative would require unavoidable impacts at the Square Lake Road interchange to approximately 0.41 acres of wetlands, as follows:

- Wetland 39 – Palustrine Emergent and Palustrine Shrub/Scrub - 0.25 acres
- Wetland 41 - Palustrine Emergent and Palustrine Shrub/Scrub - 0.16 acres

Compensatory wetland restoration or creation is planned in accordance with state and local wetland protection ordinances. The emergent and scrub shrub wetlands that would be affected by this project would be mitigated at a 1.5:1 ratio, so that each acre of impact is compensated with 1.5 acres of mitigation wetland, for a total mitigation need of about 0.61 acres.

The impacted wetlands fall within the ecoregion called Sub-subsection VI.1.2 Ann Arbor Moraines, of Subsection VI.1 Washtenaw, of Section VI Southern Lower Michigan.<sup>1</sup> They are within the Quarton Branch of the River Rouge watershed. The wetland impact site and the proposed mitigation site are shown in Figure 5-1.

---

<sup>1</sup> *Regional Landscape Ecosystems of Michigan*, D.A. Albert, 1995.

### Wetland Impacts at Square Lake Road



### Mitigation Site (in blue)

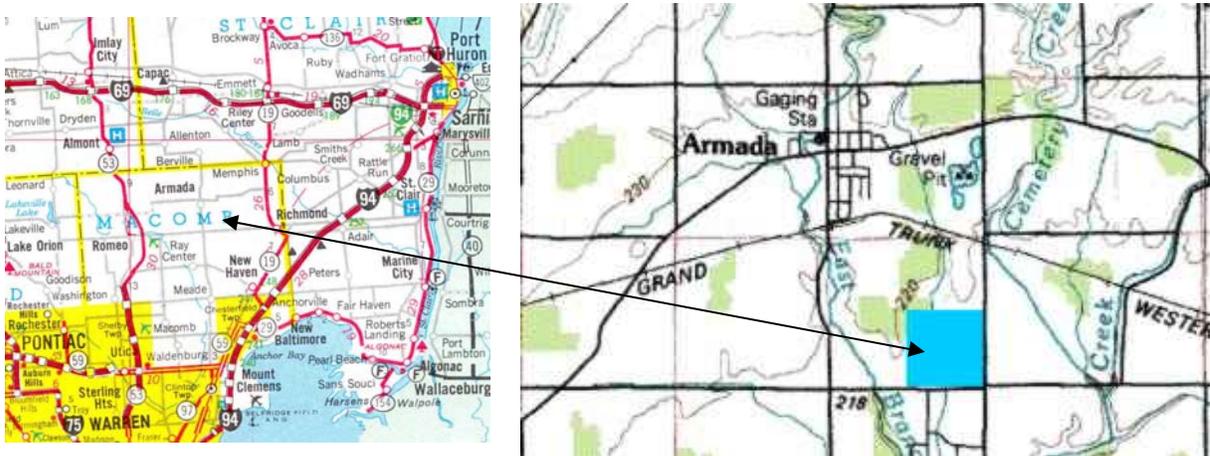


Figure 5-1  
Wetland Impact and Mitigation Sites

The proposed mitigation site is located in the southeast quadrant of Section 25 of Armada Township in Macomb County. It falls within the ecoregion called Sub-subsection VI.1.1 Maumee Lake Plain, of Subsection VI.1 Washtenaw, of Section VI Southern Lower Michigan. On July 14, 2003 a field review of a site was completed with a representative of the MDEQ, who concurred that this site would meet the mitigation need of the I-75 project, even though the mitigation site is within the Coon Creek (Unit 31) and Highbank Creek (Unit 28) subwatersheds of the Clinton River Watershed. The site is in Armada Township in Macomb County. The National Resource Conservation Service has classified the site as Prior Converted wetland. The site has been cleared of any environmental issues.

A detailed wetland mitigation and monitoring plan will be designed by MDOT that will restore adequate hydrology to the mitigation site to re-establish wetland habitats. The primary emphasis will be through manipulation of existing drain tiles and water elevations in ditches. A mitigation and monitoring plan will be prepared to document the development of the created wetland. The plan will include performance criteria, address the control of invasive species, and specify the protection of the mitigation area in perpetuity through use of a conservation easement.

Minimization of sedimentation to wetlands during construction would be accomplished by soil erosion and sediment control practices consistent with conditions of MDOT's Soil Erosion and Sedimentation Control Program. As the project includes major reconstruction of the interstate, and ordinarily the disturbance limits of construction equipment are broad in such circumstances, construction contracts will specify that there be no disturbance in the delineated wetland areas.

## **5.15 National Geodetic Survey Monuments**

The corridor will be reviewed prior to construction to determine the location of U.S. Department of Commerce, National Geodetic Survey monuments (<http://www.ngs.noaa.gov>) to prevent disturbance to such monuments.

## **5.16 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 as 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.

MDOT is concerned with worker health and safety and will abide by appropriate federal, state and local criteria and guidelines.

These preceding mitigation concepts are based on the best information available through October 2003.

# **SECTION 6**

## **EARLY COORDINATION, PUBLIC MEETINGS, AND SCHEDULE**

This section traces the public and agency input that was vital to the development of the alternatives, the analysis of impacts, and the measures to minimize harm that have been developed to mitigate project impacts. The first section covers early coordination, wherein those with a review or regulatory role, or special interest in the project, were specifically invited to participate in a dialogue about the project. The next section covers the public meetings held during the course of the project that led to the public hearing.

### **6.1 Early Coordination**

A Notice of Intent to prepare an Environmental Impact Statement was published in the *Federal Register* June 14, 2002 (Appendix B). A scoping meeting was held August 29, 2002 in Troy for agencies and local entities. A scoping packet was mailed to those invited prior to the meeting. A listing of those invited, those who attended and those who responded to scoping materials is found in Appendix B. Pertinent correspondence received by MDOT is also included in Appendix B, as are minutes of the scoping meeting.

Because of the potential for wetland impacts MDOT initiated the Section 404 Concurrency Process. This process ensures that MDEQ, US EPA, the US Fish & Wildlife Service, and the US Army Corps of Engineers concur with MDOT on the project purpose and need and the practical alternatives to be evaluated in the DEIS. The intent is to get agreement at key points in the process to avoid delays later. As only 0.4 acres of wetland would be affected, the concurrency process was later deemed unnecessary. It is for this reason that there are references to concurrency in the letters from MDEQ dated March 14, 2003, and from US EPA dated May 23, 2003. And, in the letter dated October 17, 2002, the Corps noted that the project was outside their jurisdiction. The US Fish & Wildlife Service made no mention of concurrency in their letter dated March 21, 2003. Letters sent to MDEQ, US EPA, and the US F&WS ending the concurrency process are included at the end of Appendix B, Section 2.

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

#### **6.1.1 Federal Agencies**

- U.S. Fish & Wildlife Service – Noted that, “based on information presently available, there are no endangered, threatened, proposed, or candidate species, or critical habitat occurring within the proposed project areas. This presently precludes the need for further action on this project as required under Section 7” of the Endangered Species Act of 1973.
- U.S. Department of the Army, Corps of Engineers, Detroit Division – The Civil Works Program recommended contacting several individuals with respect to planning for the Twelve Towns Drain Environmental Infrastructure Program, including the Corps Project

Manager, Pat Kuhne (313-226-6767). The Floodplain Manager recommended avoiding or minimizing adverse impacts associated with use of floodplain and stressed contact with MDEQ, Land and Water Management Division, Hydraulic Studies Unit (517-335-3181) regarding applicability of a floodplain permit. The Regulatory Office noted that the project is outside the limits of the Corps regulatory jurisdiction for Section 10 of the Rivers and Harbors Act and Section 404 of the Clean Water Act, and that contact should be made with MDEQ, Land and Water Management Division, Permit Consolidation Unit 517-373-9244).

- U.S. Environmental Protection Agency – Encouraged broadening the statement of purpose and need so transit and high occupancy vehicle use could be considered.

### **6.1.2 State Agencies**

- Michigan Department of Natural Resources, Wildlife Division – Noted 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.”
- Michigan Department of Agriculture – Noted ‘little or no adverse impacts to agriculture,’ but asked that contact be made with Mr. John McCulloch, Oakland County Drain Commissioner (248-858-0958) to avoid impacts to drainage systems.
- Michigan Department of Environmental Quality – Suggested changes to a table related to roadway deficiencies.
- Michigan Department of State, State Historic Preservation Office – Provides concurrence with the Area of Potential Effects (APE) and the recommendations regarding *National Register* eligible properties. Stated that “no historic properties are affected.”

### **6.1.3 Local Agencies**

- Road Commission for Oakland County – Supports four lanes on I-75 through Oakland County; believes the lane additions should be for general purpose, not HOV; supports single-point interchange design at both 12 Mile Road and 14 Mile Road; and, noted that it is essential that design review and collaboration take place with their Engineering / Design staff regarding county roads: 12 Mile, 14 Mile, Big Beaver, Long Lake, Crooks, and Adams.

## **6.2 Public Meetings and Public Involvement**

Meetings were held during the course of the study to solicit information from the public, interested groups and agencies. The study has been guided by a Steering Committee comprised of representatives of a number of disciplines within MDOT. An I-75 Council comprised of local elected officials, representatives of community-based organizations and businesses, and interested local citizens also provided significant input. Meeting dates of the Council and key activities at each are listed below.

- May 22, 2002 – Introduction to the project, schedule, information about the first public meeting.
- July 30, 2002 – Review of transit/HOV methodology, indirect and cumulative methodology, the upcoming scoping meeting, and the second public meeting.
- November 7, 2002 – Results of the transit and HOV analyses.
- March 12, 2003 – Presentation of video summary of project, graphics of preliminary engineering performed to that date, a simulation of noise along the freeway, and a

simulation of how the single-point interchange would operate at 12 Mile Road. This meeting coincided with the public meeting, with the I-75 Council invited to attend.

- June 5, 2003 – Review of project status, capacity analysis, crash study results, and preliminary impact analysis results.

The public was directly involved at all stages, with multiple meetings prior to the public hearing. The mailing list from the I-75 Feasibility Study was carried over to the DEIS. Over 7,000 postcard notifications were mailed about ten days in advance of each meeting. Meeting dates, topics, and issues of interest at each meeting are noted below.

- June 5 & 6, 2002 – Kickoff meeting to introduce the project, discuss the schedule, and solicit initial ideas regarding solutions. Auburn Hills Community Meeting Room and the Viking Ice Arena in Hazel Park. Issues of interest: concern with noise, overweight trucks, notification process, and control of growth; support for transit and park-and-ride. (Total attendance 38 and 11, respectively).
- August 21, 2002 – Preliminary results of the transit and HOV analyses. Troy Public Library. Issues of interest: benefit/cost of proposed project; transit support; air quality; noise; poor bridge conditions; poor arterial conditions; build as quickly as possible. (Total attendance 60).
- March 12, 2003 – Preliminary roadway layout, including 12 and 14 Mile Road interchanges, and noise simulation. Auburn Hills Community Meeting Room. Issues of interest: concern with how long it may take to get lane added, and whether funding would be cut; concern that HOV might add to project cost; concern with noise and support for use of “quiet” pavement; support for other transportation modes; support for motorcycle use of HOV lane. (Total attendance 45).

At the first two meetings, a brief presentation was provided, followed by questions/answers and discussion. Graphics were present at all meetings to allow informed discussions. Comment forms were available at all meetings and collected at the meeting or later by mail. Comments were also solicited and recorded by staff attending the meetings. A toll-free phone number (1.800.GO FIX 75 or 886.463.4975) was available to sign up for mailings and to make any comments. A log of email (the email address is [www.mdot.state.mi.us/projects/I-75corridor/](http://www.mdot.state.mi.us/projects/I-75corridor/)) and other correspondence was kept during the course of the project. Emails and correspondence were responded to promptly. Local officials were visited numerous times to understand the interests and concerns of their constituents. Logs of email and phone calls are on file at MDOT.

During the I-75 Feasibility Study, a private individual prepared position papers entitled “Cycling Mobility: I-75 Corridor, South Oakland County” (February 2000), and, “Cycling Accessibility: I-75 Corridor, South Oakland County (November 2000). These documents support increased bicycle/pedestrian access across I-75 between 8 Mile Road and M-59, calling for new non-motorized bridge crossings of I-75:

- Between 12 and 13 Mile Roads at Girard Avenue in Madison Heights;
- Between 13 and 14 Mile Roads at Whitcomb Avenue in Madison Heights;
- Between 14 Mile and Maple Roads in Troy;
- Between Livernois Road and Rochester Road near Kirkton Street in Troy;
- Between Big Beaver and Wattles in Troy; and,
- Near the Rouge River to connect Northfield Parkway with Firefighters Park in Troy.

Local officials in Madison Heights and Troy did not mention a need for additional overpasses when they were interviewed for the project in May 2002.

### **6.3 Next Steps - Schedule**

Following availability of this Draft EIS for review by the public and federal, state, and local agencies, a public hearing will be held. After the close of the DEIS comment period, public and agency comments will be reviewed and a Preferred Alternative will be selected. This will likely occur in 2004.

A Final EIS will then be prepared that addresses the comments received and making any necessary changes to the DEIS. After that document is finalized and made available, a Record of Decision (ROD) will be prepared that chronicles the decision-making process. This would occur after project funding has been identified and the project has been found to be in conformity. When the Federal Highway Administration signs the ROD, the project can move forward to the design phase. The project is currently funded only through the environmental clearance stage.

Design will commence when funding becomes available. When design is complete, right-of-way acquisition begins. When right-of-way acquisition is completed, the project will proceed to construction. Construction will take several years and will be a function of available funding.

## SECTION 7

# LIST OF PREPARERS

### *Michigan Department of Transportation*

**Sue Datta, AICP, Project Manager**, B.S., and M.S. in Urban Planning, Michigan State University and Wayne State University. Ten years of experience in environmental, urban and regional planning.

**Andrew J. Zeigler, RLA, Metro Region Planning Manager**, B.S. in Landscape Architecture, Michigan State University. Thirty-two years of experience in land use planning, environmental document preparation, research and development projects, including twenty-three years service with the Michigan Department of Transportation. Review of project development and documentation.

**Lori Noblet, Transportation Planning Specialist**, B.S. in Political Science, University of Wyoming; M.U.P. in Urban Planning, Michigan State University. Fifteen years of experience in preparing environmental assessments and impact statements. Environmental Review Coordinator.

**Imad Gedaoun, P.E., Traffic and Safety Supervisor**, B.S. in Civil Engineering. Sixteen years of experience in civil engineering. Traffic, safety and geometrics review for the project.

**James Schultz, P.E., MITSC Manager**, M.S. in Civil Engineering, Wayne State University. Thirty-two years of experience in civil engineering in the public and private sectors. Project development and ITS review.

**Larry Wiggins, P.E., Hydraulics/Hydrology Assistant Engineer**, B.S. in Civil Engineering, Michigan Technological University. Twenty-eight years of experience at MDOT. Drainage analysis and review.

**Christopher Potvin, P.E., Hydraulics/Hydrology Consultant Review Engineer**, B.S. in Civil Engineering, Michigan State University. Six years of experience at the Michigan Department of Environmental Quality (MDEQ) and six months at MDOT. Drainage review.

**Brenda Peek, Metro Region Communications Representative**, M.A. in Urban Affairs, University of Detroit. Twenty-three years of experience in public information and communications. Communications and public relations.

**Robert Owens, Environmental Quality Specialist**, B.S. in Biology, University of Arkansas; graduate work in zoology, Ohio State University. Sixteen years with MDOT in wetland analysis and mitigation. Previously thirteen years with the U.S. Fish & Wildlife Service. Wetlands review and mitigation.

**Robert Parsons, Public Hearings Officer**, B.S. in Interpersonal and Public Communications, Central Michigan University. Fourteen years of experience in communications at MDOT. Coordination of public involvement.

***Other MDOT Personnel Assigned to this Project:***

Ron Katch, Traffic Review  
Tom Zurburg, Noise Analysis Review  
Frank Spica, Noise Analysis Review  
Eric Dhanak, Geometric and Crash Analysis Review  
Geraldyn Ayers, Environmental Supervisor  
Dave Ruggles, Archaeological Review  
Tom Hanf, Noise Analysis Review  
Dave Schuen, Threatened and Endangered Species Review  
Bill Swagler, Right of Way Estimate  
Kelly Ramirez, Conceptual Stage Relocation Plan  
Lloyd Baldwin, Cultural Resources Review  
Alex Sanchez, MDEQ Review  
Michael Anglebrandt, Project Area Contamination Survey Review  
Doug Proper, Mitigation Follow-up

***Consultant Team***

The consultants performing the analysis for this environmental document have no financial or other interest in the project or its outcome.

**Joseph C. Corradino, P.E., Project Manager**, The Corradino Group. B.C.E. Villanova University; M.S.C.E., Purdue University. Thirty-eight years of project management and environmental experience. Quality control on EIS.

**Ari Adler, Public Involvement**, The Corradino Group. B.A. Michigan State University. Thirteen years experience in public involvement and media relations. Coordination with MDOT public hearing officer and public involvement team.

**Jim Hartman, P.E., Traffic Projections and Analysis**, The Corradino Group. B.S.C.E., Michigan State University. Twelve years of experience in civil engineering planning with emphasis on traffic analysis. Crash Analysis and Traffic Report.

**Ted Stone, Environmental Manager**, The Corradino Group. B.A. Northwestern University. Thirty years experience in preparation of environmental documentation. Principal author of the EIS, Noise Report, and Air Quality Technical Report.

**William Zipp, P.E, Lead Road Engineer**, Orchard, Hiltz & McCliment. B.S.C.E., Michigan Technological University. Twenty-four years of civil and roadway design experience. Engineering Report.

**Ken Wells, P.E., Road Engineer**, Rowe, Inc. B.S.C.E. Michigan State University. Fourteen years of civil, roadway, and drainage design experience. Engineering Report.

**C. Stephan Demeter, Senior Historical Archaeologist/Principal Investigator**, Commonwealth Cultural Resources Group. B.A. Anthropology and History Wayne State University; M.A Anthropology, Wayne State University. Thirty years performing historic resource surveys. Phase I Archaeology Survey and Phase I Above-Ground Survey.

**John Freeland, Ph.D., PWS, Wetland Analysis,** Tilton and Associates, Inc. B.S. Grand Valley State University; M.S. University of New Hampshire; Ph.D. North Dakota State University. Fourteen years of wetland and integrated resource assessment. Wetlands Report.

**Deborah Schutt, Socioeconomic Analysis,** Schutt and Company; B.A. Valparaiso University; M.S. Urban Planning Wayne State University. Twenty-six years of management and planning experience.

**Gnanadesikan Ramanujam, P.E. (Ram), Geotechnical Analysis,** SOMAT Engineering. M.S. in Civil Engineering, Vanderbilt University, Nashville, Tennessee. Thirteen years experience in geotechnical engineering. Manager of geotechnical analysis.



## **SECTION 8**

# **DISTRIBUTION LIST**

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

### **Federal Agencies**

Environmental Protection Agency, Administrator, Washington, D.C.  
Environmental Protection Agency, Region V  
National Park Service  
Natural Resources Conservation Service  
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, Fish & Wildlife Service  
U.S. Department of Transportation, Federal Transit Administration  
U.S. Department of Energy, Washington Office  
U.S. Department of Health & Human Services, Center for Disease Control

### **State Agencies**

Michigan Department of Agriculture  
Michigan Department of Community Health  
Michigan Department of Environmental Quality  
Michigan Department of Natural Resources  
Michigan Department of State, State Historic Preservation Office

### **Local Jurisdictions and Agencies**

Clean Water Action, Michigan  
Michigan Environmental Council  
Michigan United Conservation Clubs, Inc.  
Sierra Club  
Traffic Improvement Association of Oakland County  
Auburn Hills  
Bloomfield Township  
Detroit  
Ferndale  
Hazel Park  
Madison Heights  
Royal Oak  
Troy  
Oakland County  
Oakland County Conservation District  
Oakland County Drain Commission  
Oakland County Emergency Management  
Oakland County Health Department  
Oakland County Sheriff's Department  
Oakland County Soil Conservation District

Road Commission for Oakland County  
Southeast Michigan Council of Governments  
SMART  
Wayne County Department of Public Services  
State Senator Michael D. Bishop, District 12  
State Senator Shirley Johnson, District 13  
State Senator Gilda Z. Jacobs, District 14  
State Representative David T. Woodward, District 26  
State Representative Andy Meisner, District 27  
State Representative Clarence Phillips, District 29  
State Representative Shelly Goodman Taub, District 40  
State Representative John G. Pappageorge, District 41  
U.S. Senator Carl Levin  
U.S. Senator Debbie Stabenow  
U.S. Representative Joe Knollenberg  
U.S. Representative Sander Levin

