

Application for Section 106 Review

ER# 08-462

Phased Section 106 Submittal

Assessment of Effects

Downtown Detroit to Interstate I-75/Fisher Freeway

WOODWARD AVENUE LIGHT RAIL TRANSIT PROJECT

Detroit, Michigan

October 2010



U.S. Department
of Transportation
**Federal Transit
Administration**



City of Detroit
Department of Transportation

WOODWARD LIGHT RAIL

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STATE HISTORIC PRESERVATION OFFICE
Application for Section 106 Review

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Submit one copy for each project for which review is requested. This application is required. Please type. Applications must be complete for review to begin. Incomplete applications will be sent back to the applicant without comment. Send only the information and attachments requested on this application. Materials submitted for review cannot be returned. Due to limited resources we are unable to accept this application electronically.

I. GENERAL INFORMATION

THIS IS A NEW SUBMITTAL THIS IS MORE INFORMATION RELATING TO ER# 08-462

- a. Project Name: Woodward Avenue Light Rail Transit Project - Phased Sec. 106 Submittal; see Attachment A.
- b. Project Address (if available): Generally Woodward Avenue from Downtown Detroit to Michigan State Fairgrounds/8 Mile Road.
- c. Municipal Unit: Detroit and Highland Park County: Wayne
- d. Federal Agency, Contact Name and Mailing Address (*If you do not know the federal agency involved in your project please contact the party requiring you to apply for Section 106 review, not the SHPO, for this information.*): Tricia Harr, AICP, Environmental Protection Specialist, Federal Transit Administration, 1200 New Jersey Avenue SE, E43-105, Washington, DC, 20590; 202-366-0486 or tricia.harr@dot.gov
- e. State Agency (if applicable), Contact Name and Mailing Address: Matt Webb, Project Manager, Michigan Department of Transportation, Van Wagoner Building, 425 West Ottawa Street, Lansing, MI, 48909
- f. Consultant or Applicant Contact Information (if applicable) *including mailing address*: Tim Roseboom, Project Manager, Detroit Department of Transportation, 1301 East Warren, Detroit, MI, 48207; 313-833-1196 or timros@detroitmi.gov

II. GROUND DISTURBING ACTIVITY (INCLUDING EXCAVATION, GRADING, TREE REMOVALS, UTILITY INSTALLATION, ETC.)

DOES THIS PROJECT INVOLVE GROUND-DISTURBING ACTIVITY? YES NO (If no, proceed to section III.)

Exact project location must be submitted on a USGS Quad map (portions, photocopies of portions, and electronic USGS maps are acceptable as long as the location is clearly marked).

- a. USGS Quad Map Name: Detroit and Highland Park, Attachment B.
- b. Township: T2S Range: R12E Section: N/A
- c. Description of width, length and depth of proposed ground disturbing activity: See Attachment B.
- d. Previous land use and disturbances: See Attachment A.
- e. Current land use and conditions: See Attachment A.
- f. Does the landowner know of any archaeological resources found on the property? YES NO
Please describe:

III. PROJECT WORK DESCRIPTION AND AREA OF POTENTIAL EFFECTS (APE)

Note: Every project has an APE.

- a. Provide a detailed written description of the project (plans, specifications, Environmental Impact Statements (EIS), Environmental Assessments (EA), etc. cannot be substituted for the written description): See Attachments A, C, D, and E.
- b. Provide a localized map indicating the location of the project; road names must be included and legible.
- c. On the above-mentioned map, identify the APE.
- d. Provide a written description of the APE (physical, visual, auditory, and sociocultural), the steps taken to identify the APE, and the justification for the boundaries chosen. See Attachment A.

IV. IDENTIFICATION OF HISTORIC PROPERTIES

- a. List and date **all** properties 50 years of age or older located in the APE. If the property is located within a National Register eligible, listed or local district it is only necessary to identify the district: See Attachment A.
 - b. Describe the steps taken to identify whether or not any **historic** properties exist in the APE and include the level of effort made to carry out such steps: See Attachment A.
 - c. Based on the information contained in "b", please choose one:
 - Historic Properties Present in the APE
 - No Historic Properties Present in the APE
 - d. Describe the condition, previous disturbance to, and history of any historic properties located in the APE: See Attachment D.
-

V. PHOTOGRAPHS

Note: All photographs must be keyed to a localized map.

- a. Provide photographs of the site itself.
 - b. Provide photographs of all properties 50 years of age or older located in the APE (faxed or photocopied photographs are not acceptable).
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VI. DETERMINATION OF EFFECT

- No historic properties affected based on [36 CFR § 800.4(d)(1)], please provide the basis for this determination.
- No Adverse Effect [36 CFR § 800.5(b)] on historic properties, explain why the criteria of adverse effect, 36 CFR Part 800.5(a)(1), were found not applicable.
- Adverse Effect [36 CFR § 800.5(d)(2)] on historic properties, explain why the criteria of adverse effect, [36 CFR Part 800.5(a)(1)], were found applicable.

***Please print and mail completed form and required information to:
State Historic Preservation Office, Environmental Review Office, Michigan Historical Center, 702
W. Kalamazoo Street, P.O. Box 30740, Lansing, MI 48909-8240***

Attachment A

Additional Information for
Application for Section 106 Review

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Attachment A – Additional Information for Application for Section 106 Review

Section I. General Information

NOTE: A phased historic property identification and effects assessment was deemed appropriate for the Woodward Avenue Light Rail Transit (LRT) project and coordinated with the State Historic Preservation Office (SHPO); see response to Section IV, Part A. The enclosed documentation assesses project effects to properties listed in or determined eligible for the National Register of Historic Places (NRHP) located within the portion of the project's Area of Potential Effects (APE) in and between Downtown Detroit and Interstate 75 (I-75)/Fisher Freeway. Therefore, information provided in this Application for Section 106 Review and in its attachments describes both the general project and the specific portion of the project area between Downtown Detroit and I-75/Fisher Freeway, as relevant. Forthcoming reports will contain information on eligibility and/or effects for other portions of the project.

Section II. Ground Disturbing Activity

c. Describe the proposed dimensions of ground disturbing activity. Plans and specifications should not be substituted here. Example: 4 feet wide, 20 feet long, 2 feet deep.

The Woodward Avenue LRT project would extend approximately 8.5 miles from Downtown Detroit near the Detroit River north to 8 Mile Road along Woodward Avenue; total project length, including circulation in Downtown Detroit, would be 9.3 linear miles. The majority of the project corridor falls within the City of Detroit, with approximately two miles (from Webb Street to McNichols Street) located within the City of Highland Park. All rail line construction, including the guideway, tracks, rails, overhead contact system (OCS) poles, and stations, would occur within existing roadway rights-of-way and within travel lanes and/or median areas/sidewalks. The width and depth of ground disturbance would vary from approximately 28 to 48 feet wide and from 0 to 3 feet deep.

At this time, potential vehicle maintenance and storage facility (VMSF) sites have been identified. These areas, along with appropriate adjacent parcels, have been included in the APE. However, no VMSF sites are located within the project area between Downtown Detroit and Interstate 75 (I-75)/Fisher Freeway, the area that this submittal addresses. Forthcoming effects reports for areas that contain VMSF sites will address the ground disturbing activities for these sites.

d. Describe the previous use of the land. Was it farm land, an industrial site, a homestead, etc.? Was there a utility corridor placed on the property, were sewer and waterlines placed there 10 years ago, etc.?

Woodward Avenue

Originally, a Native American trail, Woodward Avenue became the main thoroughfare for the City of Detroit and eventually stretched twenty-seven miles from the Detroit River in urban Downtown Detroit through rural and later suburban areas northwest of the city to the City of Bloomfield Hills. In 1863, horse-drawn rail car lines were installed along four major Downtown Detroit roads, including Woodward Avenue from Jefferson Avenue to Alexandrine Street. Electric streetcar service replaced horse-drawn rail cars in late 1892.

In 1908, the world's first mile of concrete roadway was built on Woodward Avenue between 6 Mile and 7 Mile roads. The entire twenty-seven-mile length of Woodward Avenue was paved in 1916, and the nation's first three-color, four-way traffic light was installed in 1919 at the Woodward Avenue and Michigan Avenue intersection. After many legal disputes, Woodward Avenue was widened from 66 feet to 120 feet in 1936. The widening resulted in the demolition, relocation, or renovation of numerous buildings along the road. Streetcar operations along Woodward Avenue ended in April 1956. Today, the Detroit People Mover, a 2.9-mile elevated light rail system, provides local service between buildings and neighborhoods in Downtown Detroit.

Downtown Detroit and Midtown Area

The historic core from which the rest of the city later developed was located from the Detroit River to what is now I-75/Fisher Freeway. Through the nineteenth and twentieth centuries, the city steadily expanded northward with farmland giving way to residential neighborhoods, commercial buildings, factories, universities, and municipal and cultural institutions. This area contains numerous office towers, churches, theaters, and smaller commercial buildings constructed in a variety of architectural styles, including Art Deco, Beaux Arts, Chicago Style, Gothic, Romanesque, and modern styles. The stretch of Woodward Avenue from Grand Circus Park to Mack Avenue was known as Piety Hill due to the numerous churches located in that area. In the early twentieth century, the construction of the Italian Renaissance-style Detroit Public Library, the Beaux Arts-style Detroit Institute of Arts, and portions of the Wayne State University campus created Detroit's Cultural Center in the Midtown area. Midtown is the area located approximately between the north end of Downtown Detroit and the New Center area near the Woodward Avenue and Grand Boulevard intersection. The Cultural Center was later expanded in the mid-twentieth century with the construction of the Prairie-style Detroit Historical Museum and other cultural institutions. The portion of the APE considered in this application, between Downtown Detroit and I-75/Fisher Freeway, is the southernmost portion of the study area that encompasses Downtown Detroit.

New Center Area

New Center developed in the 1920s in response to the increase in automotive factories and industries in the area. This development and the creation of a small commercial and business core led to extensive residential development of the surrounding areas that housed workers associated with New Center's factories and commercial enterprises. A three-block commercial district developed on Woodward Avenue and includes two- and three-story brick commercial buildings in the Neoclassical and Art Deco styles. The General Motors Corporation and the Fisher family, prominent local real estate developers, constructed Neoclassical-style and Art Deco-style skyscrapers along Grand Boulevard to the west of Woodward Avenue and the New Center commercial district.

North of New Center, the neighborhoods of Virginia Park, Arden Park, and Boston-Edison developed in the early twentieth-century as enclaves for the middle class, upper middle class, and the wealthy. The neighborhoods feature a mix of homes and mansions including Prairie, Craftsman, and English Revival architectural styles.

Highland Park

Along Woodward Avenue, the City of Highland Park stretches from Webb Street to McNichols Road. Highland Park incorporated as a village in 1889 and as a city in 1918. The location of the Highland Park Ford Plant along Woodward Avenue spurred the development of the community from a small farming village to an urban industrial center. Commercial buildings, apartment buildings, and church buildings on Woodward Avenue were constructed in the Gothic

Revival, Beaux Arts, Renaissance Revival, and Craftsman architectural styles; they vary in height from two to eight stories, depending on the building type. Residential neighborhoods located approximately one block east and west of Woodward Avenue commonly include the American Foursquare and bungalow forms in the Craftsman, Prairie, and English Revival styles. In 1944, the world's first limited-access urban expressway, the Davison Freeway, was opened through the city center. The closure of the Highland Park Ford Plant in the late 1950s contributed to population and economic declines in the city.

Palmer Park Area

The City of Detroit jurisdiction resumes north of McNichols Road and includes Palmer Park and the Palmer Woods neighborhood. Palmer Park is a large 270-acre public park and golf course deeded to the city in 1893. The apartment buildings south of Palmer Park were constructed prior to World War II and include the Egyptian, Spanish, Mediterranean, Venetian, Tudor, and Moorish revival styles, and the Art Moderne and International styles. North of Palmer Park is the Palmer Woods neighborhood developed from farmland in the 1920s as an upper-class class neighborhood of large Tudor Revival-style homes. North of Palmer Park and the Palmer Woods neighborhood are the Evergreen and Woodlawn cemeteries, which date to 1905 and 1895, respectively. The sprawling Michigan State Fairgrounds are located on the east side of Woodward Avenue between West State Fair Avenue and 8 Mile Road. Organized in Detroit in 1849, the fairgrounds were moved to their present location in 1905. The main fairground buildings were constructed in the Neoclassical style typical of fair architecture in the early twentieth century; Greek Revival, Arts and Crafts, and modern styles are also represented by various buildings within the complex.

e. Describe the current use and condition of the property.

The Woodward Avenue LRT project traverses a diverse area containing commercial, institutional, civic, recreational, industrial, and residential uses. Woodward Avenue remains a major thoroughfare from the Detroit River and the Central Business District of Downtown Detroit north to 8 Mile Road. Throughout the proposed project corridor along Woodward Avenue, commercial, institutional, and industrial land use is most common, with sprawling residential areas frequently located beyond development immediately fronting Woodward Avenue. Both modern redevelopment and vacant and cleared land is most common between I-75/Fisher Freeway and I-94/Ford Freeway. Despite some modern development, older buildings and neighborhoods are located throughout the corridor. Many historic buildings and neighborhoods along Woodward Avenue have been listed in the NRHP and/or have been locally designated as historic by the appropriate local municipality or by the State of Michigan.

The portion of the APE considered in this application, between Downtown Detroit and I-75/Fisher Freeway, is the southernmost portion of the study area. The APE in this portion encompasses the densely developed Downtown Detroit area and includes many of Detroit's most prominent historic sites, civic buildings, and cultural attractions, including Campus Martius Park, the Fox Theatre, major league sports arenas, and the Cobo Convention and Exhibition Center. Buildings in Downtown Detroit are predominately skyscrapers interspersed with smaller commercial buildings.

Section III. Project Work Description and APE

a. Provide a detailed written description of the project.

The Woodward Avenue LRT project would consist of a 9.3-mile fixed guideway LRT system along the Woodward Avenue corridor in Detroit and Highland Park, Michigan (see Attachment C). The proposed system would use steel-wheel LRT vehicles with a typical train consisting of two cars. The system would be street running.

The guideway would typically be located in the center median area of Woodward Avenue between 6 Mile Road to north of State Fair Avenue. South of 6 Mile Road to north of Grand Boulevard, the tracks would be located primarily in the center of the roadway. From Downtown to Grand Boulevard, there are two separate rail location alternatives being considered: median-running or curb-running.

Median-Running Alternative: This alternative would locate the LRT in the center median of Woodward Avenue from Grand River Avenue to Grand Boulevard and would run separate from vehicular traffic.

Curb-Running Alternative: This alternative would locate the LRT along the right-most travel lane of Woodward Avenue from State Street to Grand Boulevard.

Downtown Design Options

Three downtown design options are being considered and are within the APE for the area being evaluated within this submittal. All share a common point of beginning and ending near Grand River Avenue/State Street and Woodward Avenue. For each of the downtown options, the guideway would be installed in the existing street with the light rail train sharing the roadway with existing traffic. A description of each of the downtown design options follows:

Downtown Design Option 1: Proceeds south along Woodward Avenue, and then follows Grand River Avenue until reaching Washington Boulevard. This option continues south on Washington Boulevard, proceeds east along Larned Street and then turns north on Randolph Street. Design Option 1 then follows Congress Street west until returning to Woodward Avenue via Washington Boulevard and Grand River Avenue. North of Grand River Avenue, Design Option 1 incorporates the Median-Running Alternative described above. Design Option 1 has four stations between Downtown and I-75/Fisher Freeway. See Attachment B and Map Attachment C.

Downtown Design Option 2: Follows the same alignment as Design Option 1. However, it is routed to the west along State Street between Woodward Avenue and Washington Boulevard. Along Woodward Avenue and north of Park Avenue/Witherell Street, Design Option 2 incorporates the Curb-Running Alternative described above. There are seven stations between Downtown and I-75/Fisher Freeway proposed with this option, including those for Design Option 1 plus three additional stations. See Attachment B and Map Attachment D.

Downtown Design Option 3: This option remains on Woodward Avenue along its entire route, terminating between Larned and Congress streets; it incorporates the Curb-Running Alternative described above. Four stations are located between Downtown and I-75/Fisher Freeway for this design option. See Attachment B and Map Attachment E.

The proposed LRT system would require the construction of several supporting project elements and facilities, including the guideway, a traction electrification system, transit power substations, a vehicle storage maintenance facility, and LRT stations. A brief description of each follows:

- Guideway – The light rail system would run along a fixed guideway consisting of steel tracks at a standard gauge of 4 feet, 8.5 inches. The guideway would be located exclusively within existing road rights-of-way, except near the vehicle storage maintenance facility (site unconfirmed at this time). The guideway would be exclusive to light rail operations, and no vehicle traffic would be allowed for much of the alignment; however, the system would operate in vehicle traffic in Downtown Detroit. The guideway would be embedded in the pavement.
- Traction Electrification System – A simple catenary system would be used for the traction power contact system. The OCS would consist of support poles and wires providing electrification to the light rail vehicles. These features would be located along the proposed route and situated in existing road rights-of-way.
- Transit Power Substations – Spaced along the proposed route at approximately one-mile intervals, these substations would supply power to the LRT system. The substation’s precise locations have not been determined at this time.
- Vehicle Storage and Maintenance Facility – A facility would be required to store and maintain the light rail vehicles. Typical functions at this location would include vehicle storage, paint booth, lifts, pits, wheel truing, wash bays, and associated administrative functions. It is expected that the site selected would be: 1) no less than five acres in size; 2) close to the transit alignment; and 3) located in an area consistent in land use and zoning. Selection of a preferred site is ongoing. Three potential sites for this facility have been identified; none of these sites is located in the area that is the subject of this application.
- LRT Stations – Major features of the LRT stations would be the platforms and shelters. The platform length is derived from the length of the LRT vehicles, and with the two-car trains proposed for the Woodward Avenue LRT project, a typical near-grade platform would be from 140 to 200 feet depending on the design option. The platforms would have access ramps (up to 24 feet long) and landing areas (up to 6 feet) to provide pedestrian access to the platforms. Given the various site conditions at stations along the proposed route, total station length would vary from 180 to 260 feet. Typical width would be 18 to 24 feet for double-sided platforms, and approximately 10 feet, 6 inches to 12 feet for single-sided platforms; typical platform height would be 14 inches to accommodate the proposed low-floor LRT vehicles.

Station shelters may be designed with a signature look and/or be context-sensitive to the respective setting at each site. They protect waiting passengers from the elements and can include special features such as passenger displays, sound systems, lighting, and heating elements. Other facilities and station furniture would also include ticket vending and security equipment, schedule and area information cases, railings, benches, and litter receptacles.

The station locations between Downtown Detroit and I-75/Fisher Freeway are summarized in the table (Figure 1) below.

Figure 1: LRT Station Locations between Downtown Detroit and I-75/Fisher Freeway

Station	w/Downtown Design Option #1	w/Downtown Design Option #2	w/Downtown Design Option #3
Cobo Center: E (Larned at Washington Blvd.) and W (Congress at Washington)	X	X	
Woodward: E (Larned at Woodward) and W (Congress at Woodward)		X	X*
Randolph St.: E (Larned at Randolph) and W (Congress at Randolph)	X		
Randolph Street		X	
Rosa Parks Transit Center (Washington Blvd.)	X	X	
State/Gratiot		X	X
Adams/Grand Circus Park		X	X
Foxtown/Stadium	X	X	X
Total Stations	4	7	4

*Located directly on Woodward Avenue between Larned and Congress streets

d. Provide a written description of the APE (physical, visual, auditory, and sociocultural), the steps taken to identify the APE, and the justification for the boundaries chosen.

The APE for the Woodward Avenue LRT project encompasses roadways within which the LRT would be located, all properties flanking those roadways, and properties for which the LRT or its components would be a prominent visual feature (see Map Attachments C, D, and E). For visual considerations, the APE encompasses properties that do not directly adjoin the project corridor, but are otherwise located proximate to it or to a project facility. For example, a building not adjoining but directly facing a Woodward Avenue LRT roadway at an intersection, or a building separated from the proposed project corridor by a vacant lot or parking lot would be included in the APE. Properties surrounding or in proximity to three potential sites for the VMSFs and for which that facility would be a prominent visual feature have also been included in the APE.

The APE was developed by utilizing preliminary project plans in conjunction with field survey of the project corridor and consultation with project noise and vibration specialists. Because no auditory or vibratory impacts are anticipated, the APE was developed to encompass potential

visual and physical effects related to facility construction near the project corridor. To encompass effects in the immediate vicinity of the project alignment, all roadways within which the LRT would be located and flanking properties have been included in the APE. Additional consideration was given to viewshed impacts and effects to setting beyond these properties. Properties determined to be subject to a potential visual effect were identified and included in the APE; the methodology employed is described below. No potential traditional cultural properties or socio-cultural impacts have been identified. At this time, no changes to land use, traffic patterns, or public access are anticipated. Transit-oriented development (TOD) planning is in preliminary stages and will be evaluated for Section 106 purposes, if applicable and appropriate, when TOD projects are proposed.

During the field survey, project architectural historians who meet the Secretary of the Interior's Professional Qualification Standards reviewed the visual setting of properties that do not adjoin the project corridor but for which the project corridor is a visual component because of the lack of an intervening physical feature (for example, a property separated from the project corridor by a vacant lot). In general, the architectural historians determined that for such properties located within 250 feet of the proposed LRT tracks and OCS and/or a station (for both the Median-Running and Curb-Running alternatives), proposed project features would become a prominent component of the property's visual setting, and, therefore, such properties would be visually affected by project implementation. For such properties beyond 250 feet, the architectural historians determined that the LRT would not become a significant component of the property's visual setting, and, therefore, such properties would not be visually affected by the Woodward Avenue LRT. Thus, properties that do not immediately adjoin the project corridor but for which the proposed Woodward Avenue LRT was determined to be a prominent visual component have been included in the APE. Following the selection of three potential sites for a proposed VMSF, the APE was expanded in these areas to accommodate surrounding and proximate properties for which the facility would constitute a substantial visual change.

The APE for the Woodward Avenue LRT project was provided to the SHPO by letter from the Detroit Department of Transportation dated November 20, 2009; the SHPO concurred with the APE by letter dated January 13, 2010. Because the project's VMSF sites were only recently identified, the APE has been expanded to accommodate these parcels, as well as adjacent parcels that would be potentially affected. Mapping showing this revised APE was submitted to the SHPO on September 17, 2010 for concurrence.

Section IV. Identification of Historic Properties

a. List and date all properties 50 years of age or older located in the APE.

A historic property identification report, "Phased Section 106 Submittal: Downtown Detroit to Interstate 75/Fisher Freeway" (September 2010), was submitted to the SHPO on September 14, 2010. A phased historic property identification and effects assessment effort was deemed appropriate for the Woodward Avenue LRT project and coordinated with the SHPO to avoid a single large submittal, as well as to provide project architectural historians with valuable feedback from SHPO staff that can be incorporated into the future submittals. This report identified built resources more than forty years of age located within the project's APE in and between Downtown Detroit and I-75/Fisher Freeway. Properties forty years of age or older (rather than the standard fifty-year age limit) were evaluated to accommodate the Woodward Avenue LRT's construction schedule.

The historic property identification report contained documentation on twenty-nine resources more than forty years of age located within the APE between Downtown Detroit and I-75/Fisher Freeway. Of these, sixteen were previously listed in the NRHP. Of the thirteen resources that were previously not identified and/or evaluated for NRHP eligibility, three were determined to be eligible for listing. Therefore, the current submittal evaluates potential project effects to nineteen properties listed in or determined eligible for the NRHP; these properties are listed in the table (Figure 2) below.

Figure 2: NRHP-Listed and Eligible Properties in APE between Downtown Detroit and I-75/Fisher Freeway

Name	NRHP Status*	Date Listed
Detroit Financial District Historic District	Listed	2009
Guardian Building National Historic Landmark	Listed	1989
Coleman A. Young Municipal Center	Eligible	N/A
Wayne County Building	Listed	1975
Lawyers Building	Listed	1982
130 Cadillac Square	Eligible	N/A
Vinton Building	Listed	1983
State Savings Bank	Listed	1982
Detroit Club	Listed	2004
Gabriel Richard Building	Eligible	2010
Washington Boulevard Historic District	Listed	1982
Capitol Park Historic District	Listed	1999
Michigan Soldiers' and Sailors' Monument	Listed	1984
Lower Woodward Avenue Historic District	Listed	1999
Grand Circus Park Historic District	Listed	1982
Central United Methodist Church	Listed	1983
Francis Palms Building and State Theater	Listed	1982
Fox Theatre Building National Historic Landmark	Listed	1985
St. John's Episcopal Church	Listed	1982

* Determinations of eligibility are pending SHPO concurrence

b. Describe the steps taken to identify whether or not any historic properties exist in the APE and include the level of effort made to carry out such steps.

Project architectural historians conducted intensive-level surveys within the project area and utilized public property records to identify all properties within the APE older than forty years of age. Properties forty years of age or older (rather than the standard fifty-year age limit) were evaluated to accommodate the Woodward Avenue LRT's construction schedule.

The status of NRHP-listed properties and districts located within the APE were reviewed using previous NRHP documentation to determine if any properties had changed to the extent that they were no longer eligible for the NRHP or that NRHP boundaries should be altered. During the current survey, architectural historians observed no substantial changes to any property between Downtown Detroit and I-75/Fisher Freeway that would alter its eligibility status. Thus, no eligibility or boundary changes to NRHP-listed properties are recommended in this portion of the project area.

Background research was conducted for each property not previously evaluated for listing in the NRHP. Sources consulted included public records, secondary published sources, and primary sources. Historians wrote detailed architectural descriptions and historic context statements. The NRHP criteria of eligibility were applied to each property and a determination of NRHP eligibility was made. This information was documented in survey data forms for each property.

All properties located in the APE between Downtown Detroit and I-75/Fisher Freeway were documented in the "Phased Section 106 Submittal: Downtown Detroit to Interstate 75/Fisher Freeway" (September 2010) that was submitted to the SHPO on September 14, 2010.

Section V. Photographs

See Attachments C, D, and E.

Section VI. Determination of Effect

Evaluations included in Attachments C, D, and E assess potential project effects to the nineteen NRHP-listed and NRHP-eligible historic properties within the Woodward Avenue LRT's APE in and between Downtown Detroit and I-75/Fisher Freeway. The effects determinations are summarized in Attachment F.

Methodology

Effects assessments were based on the criteria of adverse effect as defined in 36 CFR 800.5 "Assessment of adverse effects." According to this portion of the regulations, the criteria of adverse effect are defined as follows:

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative.

Examples of adverse effects are identified in 36 CFR 800.5 and include, but are not limited to, the following:

- Physical destruction of or damage to all or part of the property
- Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR 68) and applicable guidelines
- Removal of the property from its historic location
- Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance
- Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features
- Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization
- Transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance

National Register of Historic Places Bulletins do not address assessments of effects, as effects evaluations are related to the Section 106 process and not the Section 110 process in which the National Register guidance is more commonly used. However, crucial information on integrity assessments (used for eligibility determinations) provide information regarding what each aspect of integrity entails and how each aspect relates to the select National Register criteria for eligibility. As described above, retention of relevant aspects of integrity is critical to a property's significance under the NRHP Criteria for Evaluation. The National Register Bulletin *How to Apply the National Register Criteria for Evaluation* (NPS 1997) identifies the aspects of integrity and describes their relevance to the NRHP Criteria for Evaluation. The seven aspects of integrity are described in the bulletin as follows:

Location is the place where the historic property was constructed or the place where the historic event occurred. The relationship between the property and its location is often important to understanding why the property was created or why something happened. The actual location of a historic property, complemented by its setting, is particularly important in recapturing the sense of historic events and persons.

Design is the combination of elements that create the form, plan, space, structure, and style of a property. It results from conscious decisions made during the original conception and planning of a property (or its significant alteration) and applies to activities as diverse as community planning, engineering, architecture, and landscape architecture. Design includes such elements as organization of space, proportion, scale, technology, ornamentation, and materials. A property's design reflects historic functions and technologies as well as aesthetics. It includes such considerations as the structural system; massing; arrangement of spaces; pattern of fenestration; textures and colors of surface materials; type, amount, and style of ornamental detailing; and arrangement and type of plantings in a designed landscape.

Design can also apply to districts, whether they are important primarily for historic association, architectural value, information potential, or a combination thereof. For districts significant primarily for historic association or architectural value, design concerns more than just the individual buildings or structures located within the boundaries. It also applies to the way in which buildings, sites, or structures are related.

Setting is the physical environment of a historic property. Whereas location refers to the specific place where a property was built or an event occurred, setting refers to the *character* of the place in which the property played its historical role. It involves *how*, not just where, the property is situated and its relationship to surrounding features and open space. Setting often reflects the basic physical conditions under which a property was built and the functions it was intended to serve. In addition, the way in which a property is positioned in its environment can reflect the designer's concept of nature and aesthetic preferences.

The physical features that constitute the setting of a historic property can be either natural or manmade, including such elements as: topographic features (a gorge or the crest of a hill); vegetation; simple manmade features (paths or fences); and relationships between buildings and other features or open space. These features and their relationships should be examined not only within the exact boundaries of the property, but also between the property and its *surroundings*. This is particularly important for districts.

Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property. The choice and combination of materials reveal the preferences of those who created the property and indicate the availability of particular types of materials and technologies. Indigenous materials are often the focus of regional building traditions and thereby help define an area's sense of time and place. A property must retain the key exterior materials dating from the period of its historic significance. If the property has been rehabilitated, the historic materials and significant features must have been preserved.

Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory. It is the evidence of artisans' labor and skill in constructing or altering a building, structure, object, or site. Workmanship can apply to the property as a whole or to its individual components. It can be expressed in vernacular methods of construction and plain finishes or in highly sophisticated configurations and ornamental detailing. It can be based on common traditions or innovative period techniques. Workmanship is important because it can furnish evidence of the technology of a craft, illustrate the aesthetic principles of a historic or prehistoric period, and reveal individual, local, regional, or national applications of both technological practices and aesthetic principles.

Feeling is a property's expression of the aesthetic or historic sense of a particular period of time. It results from the presence of physical features that, taken together, convey the property's historic character.

Association is the direct link between an important historic event or person and a historic property. A property retains association if it is the place where the event or activity occurred and is intact to convey that relationship to an observer. Like feeling, association requires the presence of physical features that convey a property's historic character.

According to guidance found in *How to Apply the National Register Criteria for Evaluation*, different aspects of integrity may be more or less relevant dependent on why a specific historic property was listed in or determined eligible for listing in the NRHP. For example, a property that is significant for its historic association (Criteria A or B) is eligible if it retains the essential physical features that made up its character or appearance during the period of its association with the important event, historical pattern, or person(s). A property determined eligible under Criteria A or B ideally might retain some features of all aspects of integrity, although aspects such as design and workmanship might not be as important.

A property important for illustrating a particular architectural style or construction technique (Criterion C) must retain most of the physical features that constitute that style or technique. A property that has lost some historic materials or details can be eligible if it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation. The property is not eligible, however, if it retains some basic features conveying massing but has lost the majority of the features that once characterized its style. A property significant under Criterion C must retain those physical features that characterize the type, period, or method of construction that the property represents. Retention of design, workmanship, and materials will usually be more important than location, setting, feeling, and association. Location and setting will be important for those properties whose design is a reflection of their immediate environment (such as designed landscapes).

For a historic district to retain integrity, the majority of the components that make up the district's historic character must possess integrity even if they are individually undistinguished. In addition, the relationships among the district's components must be substantially unchanged since the period of significance.

In some cases, select aspects of integrity are currently and substantially compromised by prior undertakings not related to the current project. These changes may have been made prior to determinations of eligibility or since these determinations were made.

Because of common misunderstandings regarding the application of the criteria of adverse effects to historic properties, it is necessary to clearly state that just because project components may be visible from a historic property, this does not necessarily constitute an adverse effect. Factors considered for resources that fall into this category include proximity of the guideway to the historic property; the significance of viewsheds as indicated in prior documentation (including earlier documentation and more recent updates); and the overall importance of integrity of setting to the historic property's determination of eligibility. In most cases, installing the LRT guideway and OCS proximate to a historic property is not considered an adverse effect; in some cases, this finding is supported by the history of the area, where streetcars were previously present during the periods of significance of many historic properties. Conversely, adverse effect determinations tended to result when stations are proposed to be located in close proximity to historic properties or within historic districts where integrity of setting remained intact. Generally, in these cases, the stations adversely affected integrity of setting or feeling and diminished the relationship among contributing resources within the district. Prior documentation for historic properties was reviewed to determine under which

Criteria for Evaluation a property was deemed eligible for the NRHP, which historic characteristics and features of a property qualified it for eligibility, and which areas of integrity were most relevant to the eligibility determination and to what degree the property retains them.

During the current assessment of effects, information available for each historic property was reviewed to determine if the setting within and/or outside of the historic boundary, as well as viewsheds to and from each property, was historically significant and contributed to the property's eligibility. Using the same information, a determination was made regarding which aspects of integrity were most critical to a historic property's NRHP eligibility. Of note, over the course of the evaluation, it was determined that many of the historic properties did not retain integrity of setting as their historic urban surroundings have been altered over the course of time.

Preliminary noise and vibration analyses were also conducted along the transit corridor. At this time, no noise or vibration effects were identified. Results of any additional noise and vibration analyses will be reviewed to determine the potential for effects.

To determine project effects, architectural historians conducted site visits to each historic property, reviewed project plans and proposed station designs and additional documentation. Following guidelines set forth in 36 CFR 800 and supported by information on integrity set forth in the National Register Bulletin *How to Apply the National Register Criteria for Evaluation*, the following findings were used to assess project effects to historic properties:

- **No Effect:** Per 36 CFR 800.4(d)(1), an undertaking may have no effect to historic properties present in the APE, and a finding of "No Effect" may be determined for an undertaking. This finding indicates that an undertaking would not alter any aspects of integrity for any historic properties. This rationale has been used to assess effects to historic properties within the APE for the guideway alignment.
- **No Adverse Effect:** Per 36 CFR 800.5(b), an undertaking may be determined to have "No Adverse Effect" to historic properties if the undertaking's effects do not meet the criteria of adverse effect as described above. If project implementation would alter a specific aspect of integrity for a historic property but the effect would not alter a characteristic that qualifies that resource for inclusion in the NRHP in a manner that diminishes the significant aspect of integrity, then the finding for that aspect of integrity is "No Adverse Effect."
- **Adverse Effect:** An adverse effect is determined if the undertaking would alter a characteristic that qualifies that contributing resource for inclusion in the NRHP in a manner that diminishes the significant aspect(s) of integrity.

Avoidance Alternatives, Planning To Minimize Effects, and Mitigation

Per 36 CFR 800.6, findings of adverse effect to historic properties require that efforts to resolve such effects by developing and evaluating alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects must be undertaken. Throughout the course of the project, planners and design staff were made aware of the historic and architectural significance of the historic properties within the APE. Efforts have been successfully made to avoid physical impacts to historic properties. For environmental and functional considerations, the guideway alignment has been proposed to be located within the existing roadway alignments, avoiding direct physical impacts to historic properties.

Preliminary design and engineering drawings indicating station locations under the three proposed design options and general station concepts were utilized to assess potential project

effects. Based on the evaluations contained in this report, as well as project requirements and other planning and environmental constraints, project planners and designers will make all possible efforts to avoid and/or minimize all identified adverse effects to historic properties. As feasible, such measures could include alignment shifts and/or station relocations.

To determine if any historic properties within the project's APE in and between Downtown Detroit and I-75/Fisher Freeway would be affected by the Woodward Avenue LRT project, documentation was reviewed for all NRHP-listed and eligible properties within this portion of the APE, project plans for all three proposed design options were reviewed, and additional field visits were taken to each historic property. Using the criteria of adverse effect established in 36 CFR 800.5(a)(1) and guidance found in *How to Apply the National Register Criteria for Evaluation*, each historic property was evaluated to determine if implementation of the Woodward Avenue LRT project would alter any historically significant characteristics or features of each historic property by diminishing relevant aspects of that property's historic integrity.

Preliminary design and engineering drawings indicating station locations under the three proposed design options and general station concepts were utilized to assess potential project effects. Based on the evaluations contained in this report, as well as project requirements and other planning and environmental constraints, project planners and designers will make all possible efforts to avoid and/or minimize all identified adverse effects to historic properties. As feasible, such measures could include alignment shifts and/or station relocations.

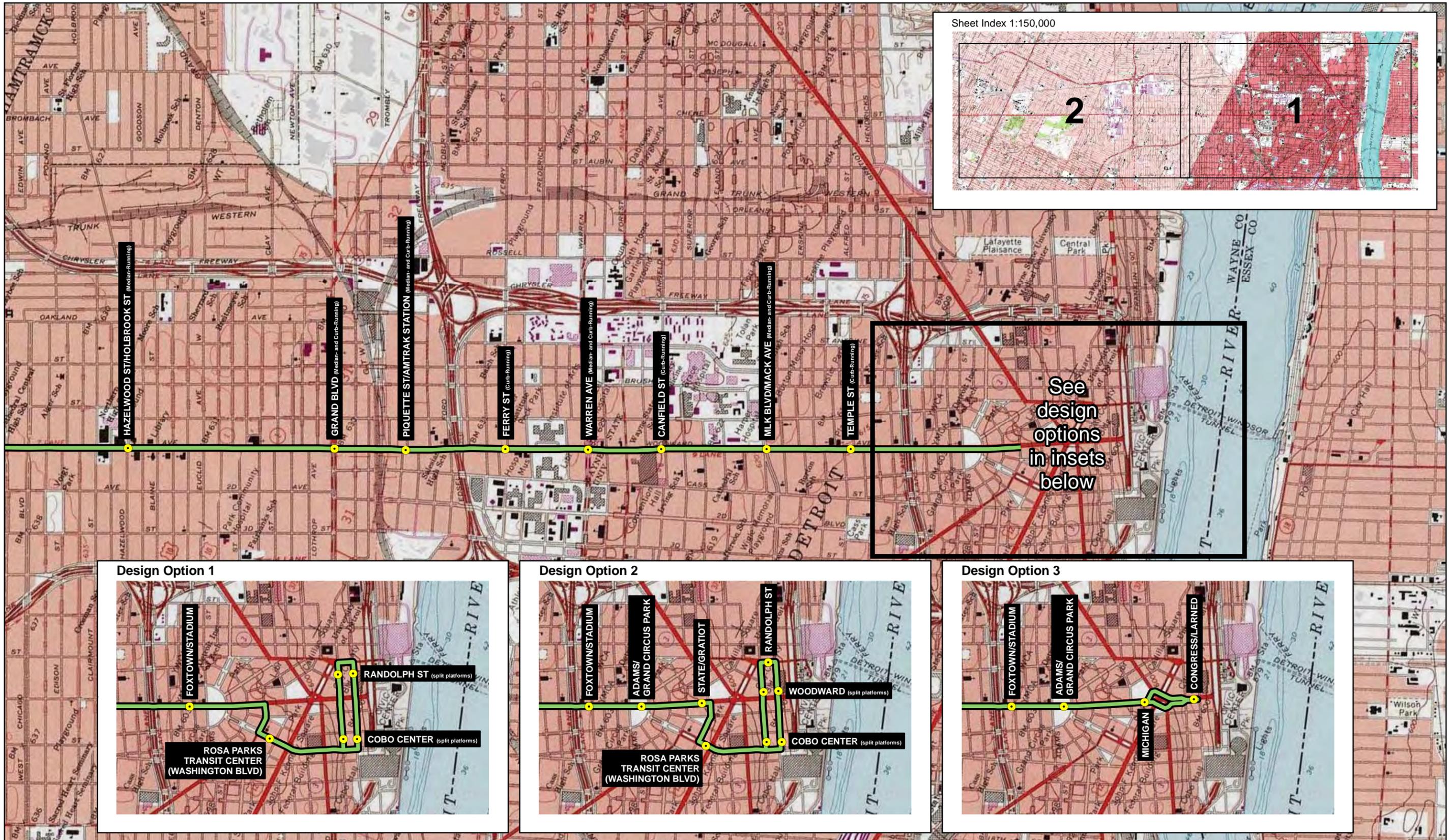
Indirect and cumulative effects to historic properties have also been considered; such effects may include reasonably foreseeable land use changes.

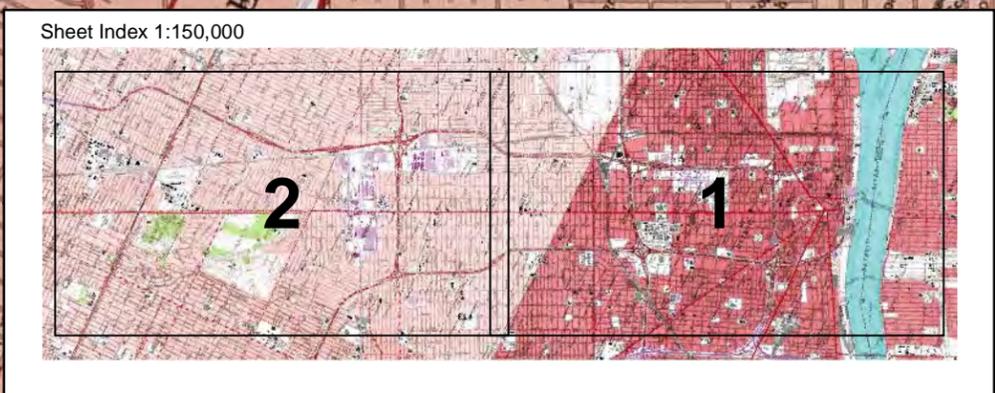
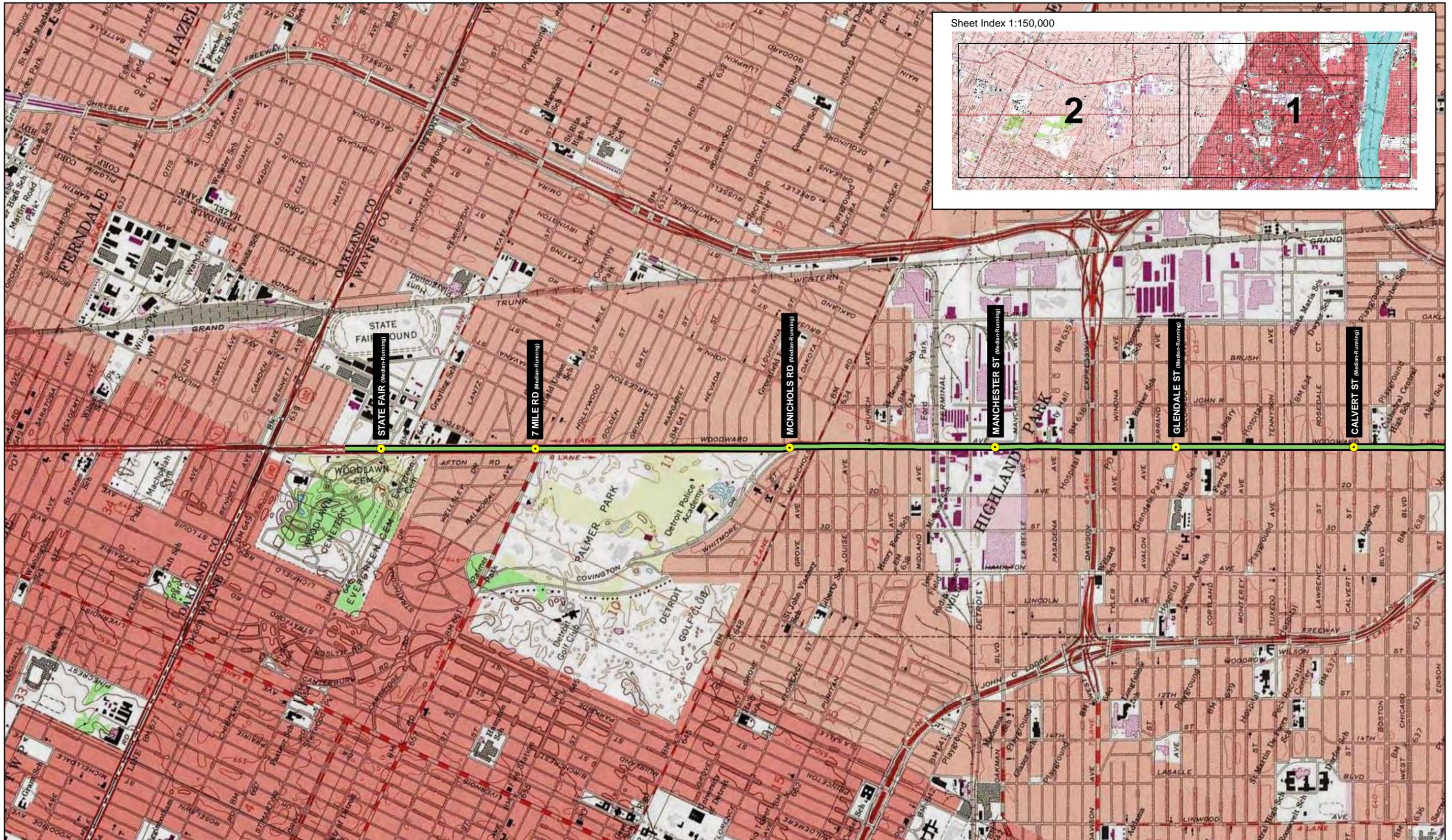
Future Project Refinement and/or Changes

Future project refinements and/or changes that would affect determinations made in this report, including efforts to avoid and/or minimize identified adverse effects, will be coordinated with the SHPO through appropriate documentation (amendment reports and/or technical memoranda). All such documentation will be provided to consulting parties for comment.

Attachment B
Project Location Map

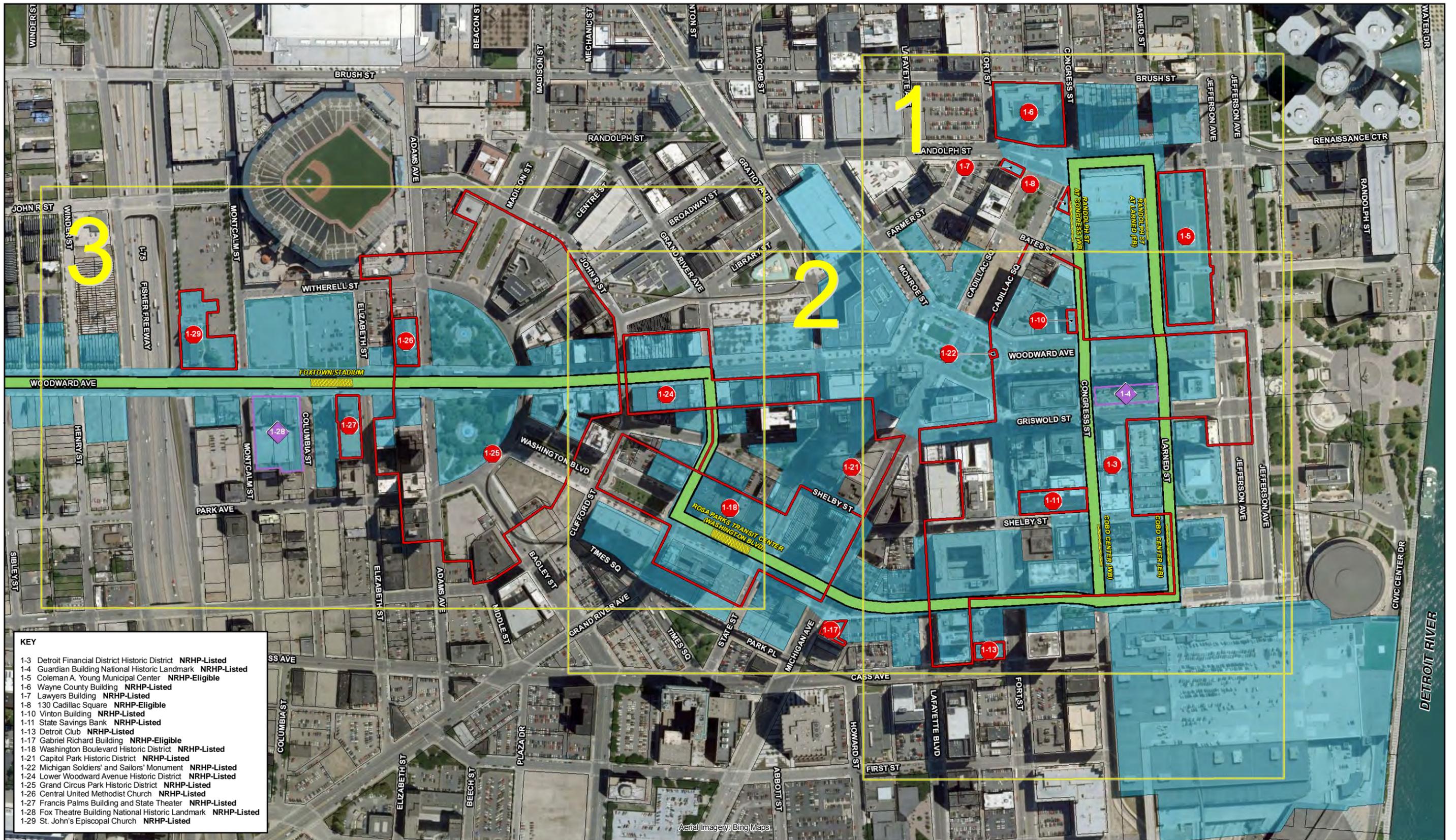
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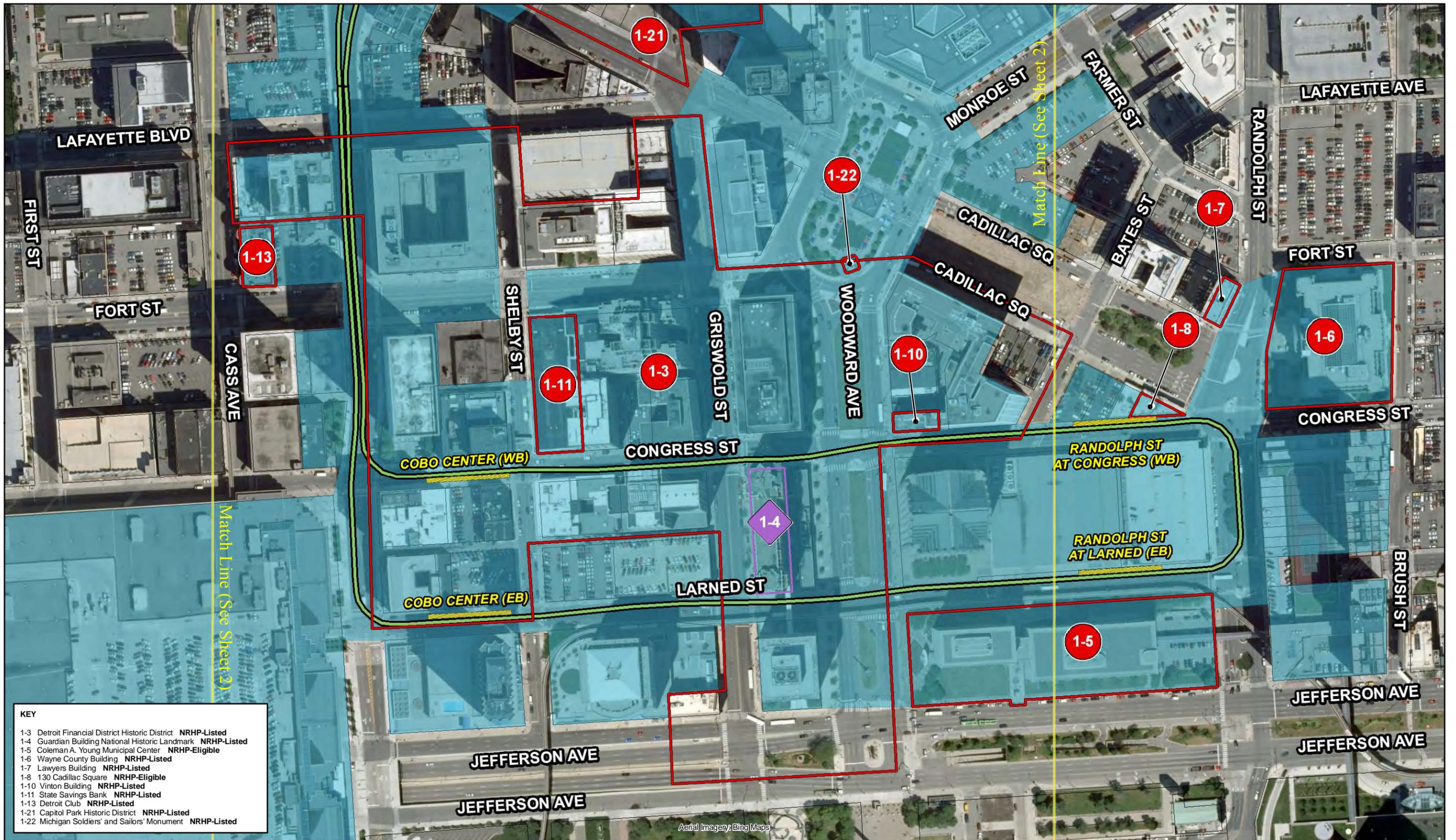




Attachment C
Determinations of Effect
Downtown Design Option 1

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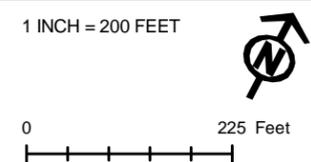


KEY

- 1-3 Detroit Financial District Historic District NRHP-Listed
- 1-4 Guardian Building National Historic Landmark NRHP-Listed
- 1-5 Coleman A. Young Municipal Center NRHP-Eligible
- 1-6 Wayne County Building NRHP-Listed
- 1-7 Lawyers Building NRHP-Listed
- 1-8 130 Cadillac Square NRHP-Listed
- 1-10 Vinton Building NRHP-Listed
- 1-11 State Savings Bank NRHP-Listed
- 1-13 Detroit Club NRHP-Listed
- 1-21 Capitol Park Historic District NRHP-Listed
- 1-22 Michigan Soldiers' and Sailors' Monument NRHP-Listed

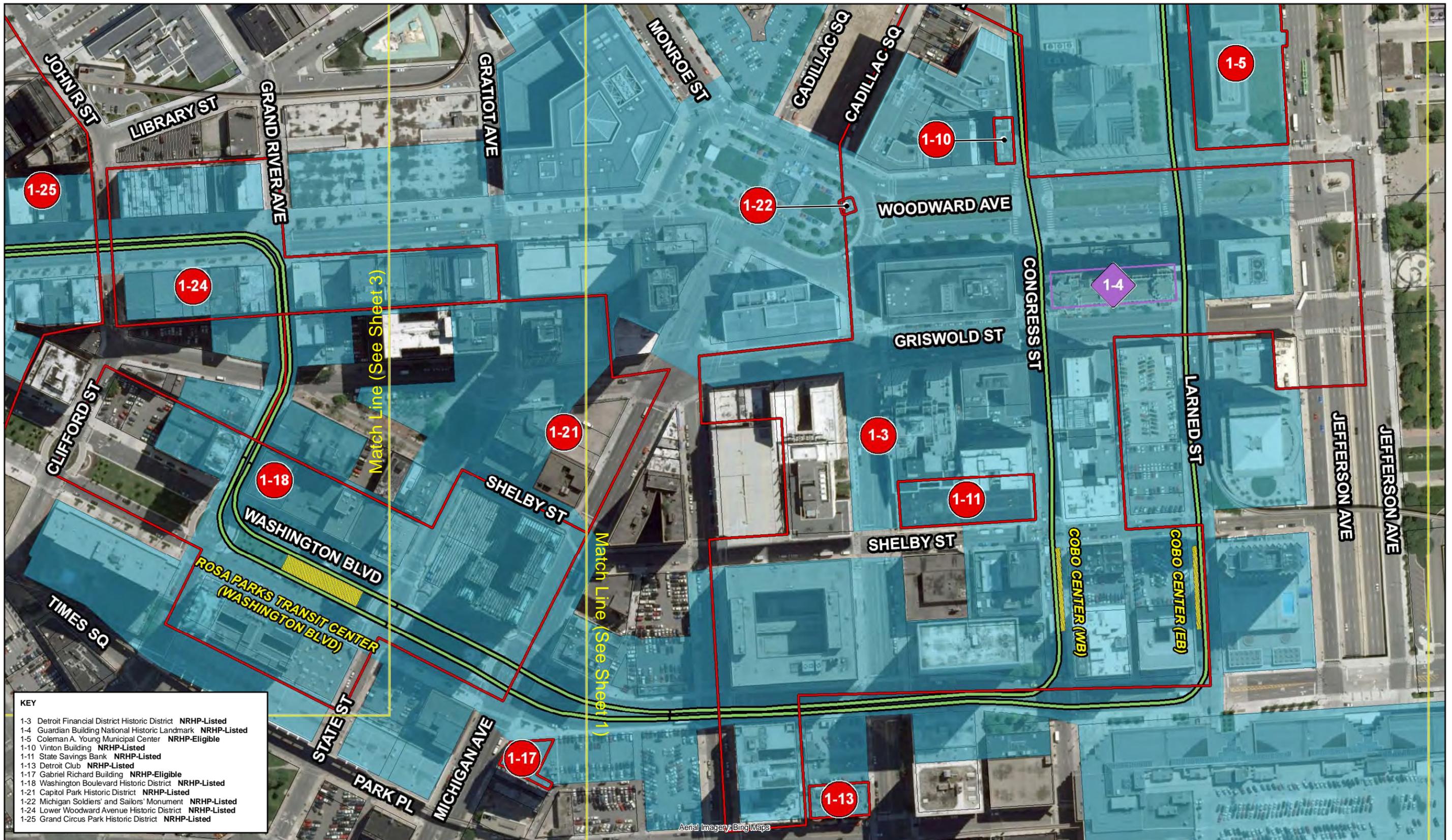


WOODWARD LIGHT RAIL



- Guideway Alignment - Design Option 1
- Proposed Station
- NRHP-Listed or Eligible Historic Property
- National Historic Landmark
- Area of Potential Effects

Map Attachment C: Area of Potential Effects and Historic Properties

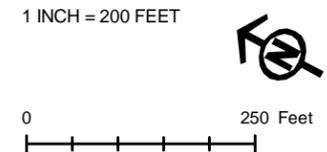


KEY

- 1-3 Detroit Financial District Historic District NRHP-Listed
- 1-4 Guardian Building National Historic Landmark NRHP-Listed
- 1-5 Coleman A. Young Municipal Center NRHP-Eligible
- 1-10 Vinton Building NRHP-Listed
- 1-11 State Savings Bank NRHP-Listed
- 1-13 Detroit Club NRHP-Listed
- 1-17 Gabriel Richard Building NRHP-Eligible
- 1-18 Washington Boulevard Historic District NRHP-Listed
- 1-21 Capitol Park Historic District NRHP-Listed
- 1-22 Michigan Soldiers' and Sailors' Monument NRHP-Listed
- 1-24 Lower Woodward Avenue Historic District NRHP-Listed
- 1-25 Grand Circus Park Historic District NRHP-Listed



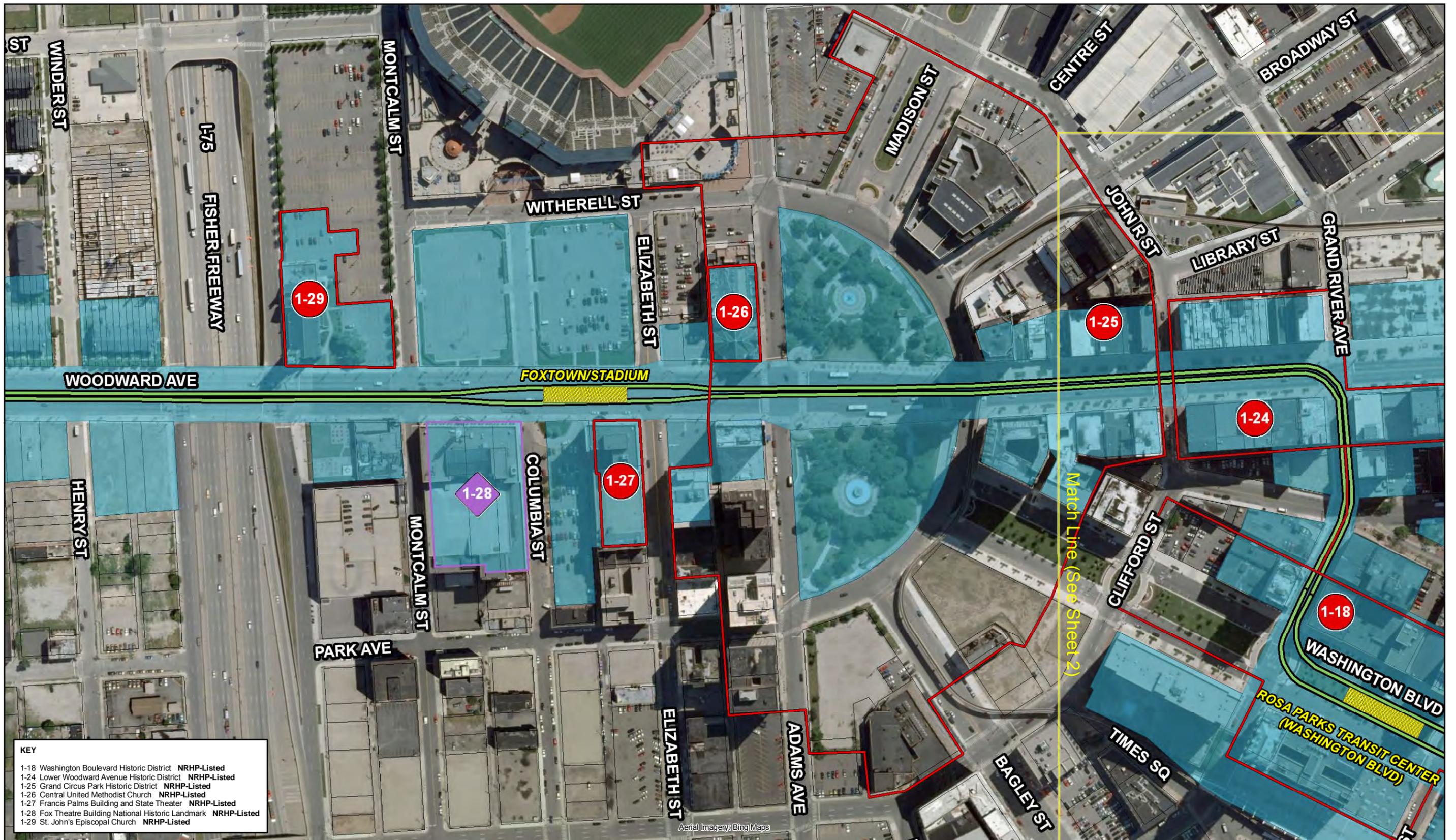
WOODWARD LIGHT RAIL



- Guideway Alignment - Design Option 1
- Proposed Station
- NRHP-Listed or Eligible Historic Property
- National Historic Landmark
- Area of Potential Effects

Map Attachment C: Area of Potential Effects and Historic Properties

Downtown Detroit to I-75/Fisher Freeway
Design Option 1 - Sheet 2 (Map 3 of 4)

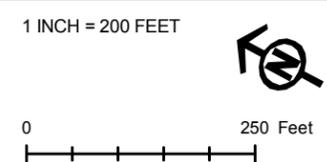


KEY

- 1-18 Washington Boulevard Historic District NRHP-Listed
- 1-24 Lower Woodward Avenue Historic District NRHP-Listed
- 1-25 Grand Circus Park Historic District NRHP-Listed
- 1-26 Central United Methodist Church NRHP-Listed
- 1-27 Francis Palms Building and State Theater NRHP-Listed
- 1-28 Fox Theatre Building National Historic Landmark NRHP-Listed
- 1-29 St. John's Episcopal Church NRHP-Listed



WOODWARD LIGHT RAIL



- Guideway Alignment - Design Option 1
- Proposed Station

- NRHP-Listed or Eligible Historic Property
- National Historic Landmark
- Area of Potential Effects

Map Attachment C: Area of Potential Effects and Historic Properties

Downtown Detroit to I-75/Fisher Freeway Design Option 1 - Sheet 3 (Map 4 of 4)

Downtown Design Option 1

See Map Attachment C

Between Downtown Detroit and I-75/Fisher Freeway, Design Option 1 includes one-way guideways circulating on Washington Boulevard and Larned, Randolph, and Congress streets at this option's southernmost point. From Washington Boulevard, the eastbound, one-way alignment turns east into Larned Street's northernmost lanes and continues east to Randolph Street where it turns north into that street's center median. The alignment then turns west and into Congress Street's northernmost lane and continues west; as it crosses Woodward Avenue, the westbound alignment shifts south and into Congress Street's southernmost lane. The alignment continues west to Washington Boulevard where it turns north and converges to a two-way, median-running alignment. Design Option 1 stations in this area include two side-platform LRT stations on both Larned and Congress streets. Cobo Center stations are located just east of Washington Boulevard along Larned Street's northernmost lane (eastbound) and along Congress Street's southernmost lane (westbound). Randolph Street at Larned stations are located just west of Randolph Street along Larned Street's northernmost lane (eastbound) and along Congress Street's northernmost lane (westbound).

Continuing north along Washington Boulevard as a two-way, median-running guideway, the alignment turns east onto Grand River Avenue and then north onto Woodward Avenue. The alignment continues as a two-way, median-running guideway to I-75/Fisher Freeway and to points north. Design Option 1 stations in this area include center-platform stations on Washington Boulevard between State Street and Grand River Avenue (Rosa Parks Transit Center/Washington Boulevard) and on Woodward Avenue between Elizabeth Street and Columbia Street (Foxtown/Stadium).

The Design Option 1 alignment would incorporate the overhead contact system (OCS), including electrification, support wires, and support poles. No traction power substations are proposed between Downtown Detroit and I-75/Fisher Freeway.

LRT station design would be context sensitive, as applicable, and would be based on stakeholder input, adjacent land use, and/or building forms and materials. Typical one-way, side-platform LRT stations would be 14 inches high, 180 to 200 feet long, and from 10 feet, 6 inches to 12 feet wide. Platforms would require access ramps from 14 to 24 feet long, depending on site conditions. Station shelters would be open or glass-enclosed and approximately 100 feet long and 10 to 14 feet tall. Additional station components would include railings, light fixtures, benches, ticket vending equipment, information cases, and litter receptacles. Typical two-way, center-platform LRT stations would comprise the same features, but platforms would be 18 to 24 feet wide.

Final LRT station design would be approached on a specific, case-by-case basis based on station location, physical context, public involvement, and any applicable local ordinances, including historic preservation ordinances mandating design review for structures in local historic districts.

The following table (Figure 3) summarizes effects determinations for Design Option 1. Detailed assessments and viewshed photographs of each historic property follow. In cases where no component of the project would be visible from the historic property and a determination of no effect has been made, no viewshed photographs are included.

Figure 3 - Effects Determinations for Design Option 1

Name	Design Option 1
Detroit Financial District Historic District <i>Listed 2009</i>	AE
Guardian Building National Historic Landmark <i>Listed 1989</i>	NA
Coleman A. Young Municipal Center <i>Determined eligible 2010</i>	NA
Wayne County Building <i>Listed 1975</i>	NA
Lawyers Building <i>Listed 1982</i>	NA
130 Cadillac Square <i>Determined eligible 2010</i>	AE
Vinton Building <i>Listed 1983</i>	NA
State Savings Bank <i>Listed 1982</i>	AE
Detroit Club <i>Listed 2004</i>	NE
Gabriel Richard Building <i>Determined eligible 2010</i>	NA
Washington Boulevard Historic District <i>Listed 1982</i>	AE
Capitol Park Historic District <i>Listed 1999</i>	NA
Michigan Soldiers' and Sailors' Monument <i>Listed 1984</i>	NE
Lower Woodward Avenue Historic District <i>Listed 1999</i>	NA
Grand Circus Park Historic District <i>Listed 1982</i>	NA
Central United Methodist Church <i>Listed 1983</i>	NA
Francis Palms Building and State Theater <i>Listed 1982</i>	NA
Fox Theatre Building National Historic Landmark <i>Listed 1985</i>	NA
St. John's Episcopal Church <i>Listed 1982</i>	NE

Detroit Financial District Historic District
(See Map Attachment C; see Figures 4-8)

The Detroit Financial District Historic District comprises the historic office building and financial core of Detroit. The district contains thirty-six buildings, all but one constructed between 1900 and 1964. The majority of buildings in the district are in the Neoclassical style, but the Renaissance, Romanesque, Commercial, Art Deco, and International styles are also represented. The district was listed in the NRHP under Criterion A for serving as the financial center of the city since 1900; under Criterion B for its direct associations with important Detroit and Michigan businessmen, such as Simon J. and William H. Murphy, Arthur H. Buhl, and Edward and John B. Ford; and under Criterion C for including some of the state's premier examples of both large and small office buildings.

Within the Detroit Financial District Historic District, project implementation under Design Option 1 would include construction of guideway alignments and the corresponding OCS within and near the historic district, two LRT stations within the district, and one LRT station near the district. Within and near the district, the proposed guideway alignment and the OCS would be located within Washington Boulevard's central lanes or within that roadway's westernmost lane and would circulate around a one-way loop, including Larned Street's northernmost lanes, Randolph Street's median, and Congress Street's northernmost or southernmost lanes. LRT stations within the district would include a side-platform station along the south edge of Congress Street and just east of Washington Boulevard and a second side-platform station along the north edge of Larned Street, also just east of Washington Boulevard. A station along the north edge of Congress Street and just east of Bates Street is located near the district.

No physical impacts to contributing properties within the Detroit Financial District Historic District would occur under Design Option 1. All construction activity would take place within existing rights-of-way; no project activity is proposed within the legal parcels of any contributing property. Rights-of-way within the district that would be affected by proposed LRT construction contain surface streets and reconstructed sidewalks and curbing; these features do not contribute to the historic district's significance. Therefore, no effects to the property's integrity of location, design, materials, and workmanship would occur under Design Option 1.

Project implementation under Design Option 1 would substantially alter the Detroit Financial District Historic District's setting because it would adversely affect the immediate historic setting of contributing resources within the district.

Based on the urban setting and the size and scale of most buildings within the district, construction of embedded guideway in surface streets and the OCS along the same streets within and near the district would represent a minor change to the district's and contributing properties' settings. These project elements would not obscure any views within, to, or from the historic district.

However, the side-platform station proposed along the south edge of Congress Street and just east of Washington Boulevard (Cobo Center westbound station) would be located immediately north of two contributing properties within the district, the Marquette Building (243 West Congress Street) and the Bankers Trust Co. Building (205 West Congress Street), and just south of two additional contributing properties, the Detroit Bank & Trust Tower (211 West Fort Street) and the U.S. Mortgage Bond Building (607 Shelby Street). This station would incorporate a 10- to 14-foot-tall, 100-foot-wide station shelter that may partially or wholly front the Marquette Building's and the Bankers Trust Co. Building's north elevations. The shelter's

proximity to the buildings would alter historically significant views to and from the contributing resources; in particular, views to Bankers Trust Co. Building's highly articulated north elevation would be obscured.

Similar visual alterations would occur at the side-platform station proposed at the north edge of Congress Street and just east of Washington Boulevard (Cobo Center eastbound station). This station would be located immediately south of portions of two contributing properties, Detroit Fire Department Headquarters (250 West Larned Street) and 234 West Larned Street. This station would incorporate a 10- to 14-foot-tall, 100-foot-wide station shelter that would wholly front 234 West Larned Street's south facade. The shelter's proximity to the building would completely obscure views to and from the building's first story.

Because project implementation would alter the visual setting for contributing properties within the Detroit Financial District Historic District, implementation of Design Option 1 would have an adverse effect to the property's integrity of setting. Based on current information, no auditory, vibratory, or atmospheric impacts were identified for these properties.

Although an adverse effect to the property's setting would occur, project activity would not alter its feeling as grouping of important, large and small, architecturally distinguished office buildings or its association with the financial history of Detroit, prominent former businessmen, and the various architectural styles represented. Therefore, project implementation would have no adverse effect to the property's integrity of feeling and association.

Based on this evaluation, the Woodward Avenue LRT would have **an adverse effect** to the Detroit Financial District Historic District under Design Option 1.



Figure 4

Facing west along Larned Street to Cobo Convention and Exhibition Center (at center) from Shelby Street



Figure 5

Facing southeast along Larned Street to Guardian Building National Historic Landmark (at left) and Michigan Consolidated Gas Building (at right) from Griswold Street



Figure 6

Facing east along Congress Street to Bates Street from southeast corner of Vinton Building (at left)



Figure 7

Facing southeast along Congress Street to contributing buildings from the State Savings Bank's southeast corner (at left)

Attachment C – Determinations of Effect – Downtown Design Option 1

Woodward Avenue Light Rail Transit Project (ER# 08-462)

Phased Section 106 Submittal – Assessment of Effects – Downtown Detroit to I-75/Fisher Freeway (October 2010)



Figure 8

Facing west along Congress Street to contributing buildings from the State Savings Bank's southwest corner at Shelby Street

Guardian Building National Historic Landmark

(See Map Attachment C; see Figures 9-10)

The Guardian Building National Historic Landmark is a monolithic forty-story, ceramic tile and brick-clad, steel-frame, skyscraper; it is an excellent example of the Art Deco style and is richly embellished with ornament indicative of that style. The property was listed in the NRHP under Criterion C as a significant example of Art Deco and skyscraper architecture designed by architect Wirt C. Rowland of the architectural firm Smith, Hinchman, and Grylls. It was designated as a National Historic Landmark in 1989.

Near the Guardian Building National Historic Landmark, project implementation under Design Option 1 would include installation of guideway alignments in Congress Street's southernmost lane 15 feet north of the property and in Larned Street's northernmost lane 15 feet south of the property. The OCS, consisting of support poles and wires, would be installed in roadway rights-of-way along the alignments.

No physical impacts to the Guardian Building National Historic Landmark would occur; no project activity is proposed within the property's NRHP boundary. Therefore, no effects to the property's integrity of location, design, materials, and workmanship would occur.

Although the proposed guideway alignment and OCS would be visible from some portions of the Guardian Building National Historic Landmark, these facilities represent a minor alteration to the property's visual setting. No views to or from the building would be obscured. Because no views would be obscured, no visual effects to the property were identified. Furthermore, based on current information, no auditory, vibratory, or atmospheric impacts were identified for these properties. Therefore, project implementation would have no adverse effect to the property's integrity of setting.

Furthermore, although a minor alteration to the property's setting would occur, no project activity would alter the property's feeling as an excellent example of an Art Deco-style skyscraper or its association with that architectural style, architect Wirt C. Rowland, or the architectural firm Smith, Hinchman, and Grylls. Therefore, project implementation would have no effect to the property's integrity of feeling and association under Design Option 1.

Based on this evaluation, the Woodward Avenue LRT would have **no adverse effect** to the Guardian Building National Historic Landmark under Design Option 1.



Figure 9

Facing southeast along Larned Street to Guardian Building National Historic Landmark (at left) and Michigan Consolidated Gas Building (at right) from Griswold Street



Figure 10

Facing north along Griswold Street to Congress Street from Guardian Building National Historic Landmark's southwest corner (at right)

Coleman A. Young Municipal Center

(See Map Attachment C; see Figures 11-12)

The Coleman A. Young Municipal Center is a Neo-Formalist-style building complex composed of two principal masses: a twenty-story, vertically oriented Courts Tower and a fourteen-story, horizontally oriented Administration Tower. The property was determined eligible for the NRHP under Criteria A and C for its association with post-World War II development in Downtown Detroit and as a landmark example of the Neo-Formalist style in the city.

Near the Coleman A. Young Municipal Center, project implementation under Design Option 1 would include construction of the guideway alignment in the northernmost lane of Larned Street and construction of the OCS and a LRT station, including a near-grade platform and shelter structure, along the north side of Larned Street. The proposed guideway would be located approximately 40 feet north of the property's NRHP boundary, and the proposed OCS would be located approximately 50 feet north of the property's NRHP boundary and 100 feet north of the building's north elevation. The proposed station would be located near the property's northeast corner and also approximately 50 feet from its NRHP boundary and 100 feet from the building's north elevation.

No physical impacts to the Coleman A. Young Municipal Center would occur; no project activity is proposed within the property's NRHP boundary. Therefore, no effects to the property's integrity of location, design, materials, and workmanship would occur under Design Option 1.

Although the proposed guideway, OCS, and LRT station would be visible from portions of the Coleman A. Young Municipal Center, no historically significant views within the property's setting would be obstructed or obscured. The proposed guideway alignment would be embedded at-grade in the northernmost lane of Larned Street, and the proposed OCS and LRT station would be located across Larned Street and front a non-historic, multi-story building and a non-historic, multi-story parking deck. The size and scale of the proposed OCS and LRT station would represent a minor alteration to the property's setting. More substantial, recent changes to the property's setting in this area include the construction of large, non-historic structures to the property's north and the installation of an elevated guideway for the Detroit People Mover automated transit system immediately north of and adjacent to the property's northern parcel boundary and NRHP boundary. The Detroit People Mover guideway would also substantially screen views from the Coleman A. Young Municipal Center to the proposed LRT components. In addition, based on current information, no auditory, vibratory, or atmospheric impacts have been identified for this property. Therefore, project implementation would have no adverse effect to the property's integrity of setting under Design Option 1.

Furthermore, although a minor alteration to the property's setting would occur, no project activity would alter the property's feeling as a mid-twentieth-century, Neo-Formalist-style building complex or its association with that architectural style and with post-World War II development in Downtown Detroit. Therefore, project implementation would have no effect to the property's integrity of feeling and association under Design Option 1.

Based on this evaluation, the Woodward Avenue LRT would have **no adverse effect** to the Coleman A. Young Municipal Center under Design Option 1.



Figure 11

Facing northwest along Larned Street to Woodward Avenue from Coleman A. Young Municipal Center's north elevation

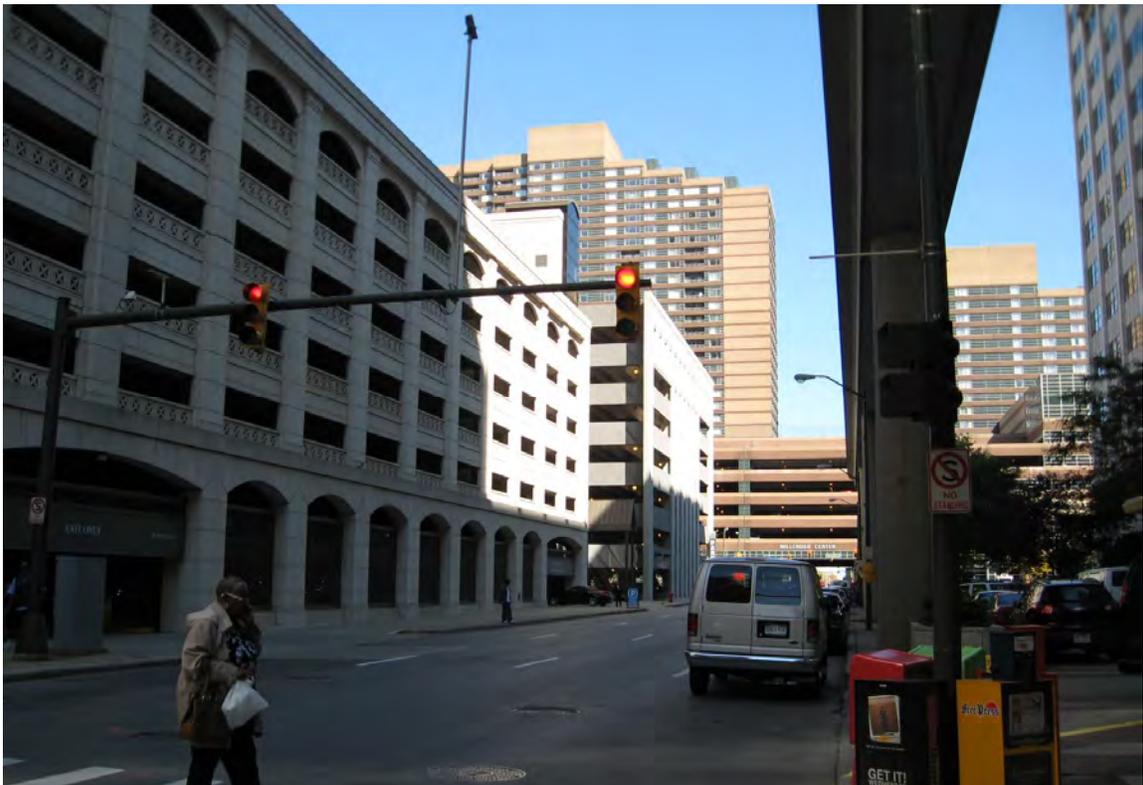


Figure 12

Facing northeast along Larned Street to parking garage (at left, center) and Randolph Street from Coleman A. Young Municipal Center's north elevation (at right)

Wayne County Building

(See Map Attachment C; see Figures 13-14)

The Wayne County Building is a five-story, granite and sandstone, Beaux-Arts-style building distinguished by a 247-foot central tower and numerous ornate sculptures and carvings. The property was listed in the NRHP under Criterion A for its significance in the political history of Detroit and under Criterion C as a significant example of Beaux Arts architecture.

Near the Wayne County Building, project implementation under Design Option 1 would be limited to installation of guideway alignments along the center and in the rights-of-way of Randolph and Congress streets, approximately 80 feet from the property's southwest corner and NRHP boundary. The OCS, consisting of support poles and wires, would be installed in roadway rights-of-way along the alignments.

No physical impacts to the Wayne County Building would occur; no project activity is proposed within the property's NRHP boundary. Therefore, no effects to the property's integrity of location, design, materials, and workmanship would occur.

Although the proposed guideway and OCS would be visible from the Wayne County Building under Design Option 1, these facilities represent a minor alteration to the property's visual settings. The guideway and OCS would be located south of the property along Randolph and Congress streets. Substantial, recent changes to the property's southern setting include the construction of large, non-historic parking garages at the southeast and southwest corners of Randolph and Congress streets. Therefore, no historic views to or from the Wayne County Building would be obscured. Because no views would be obscured, no visual effects to the property were identified. In addition, based on current information, no auditory, vibratory, or atmospheric impacts were identified for these properties. Therefore, project implementation would have no adverse effect to the property's integrity of setting.

Furthermore, although a minor alteration to the property's setting would occur, no project activity would alter the property's feeling as a nineteenth-century Beaux-Arts-style building, its association with that architectural style, or with the political history of Detroit. Therefore, project implementation would have no effect to the property's integrity of feeling and association under Design Option 1.

Based on this evaluation, the Woodward Avenue LRT Design Option 1 would have **no adverse effect** to the Wayne County Building.



Figure 13

Facing west to Cadillac Square (at right), 130 Cadillac Square (at center), and Congress Street (at left) from Wayne County Building's southwest corner



Figure 14

Facing southeast along Randolph Street to Congress Street and Randolph Street intersection from Wayne County Building's southwest corner

Lawyers Building

(See Map Attachment C; see Figure 15)

The Lawyers Building is a ten-story office building executed in the Commercial Style and characterized by its three-part vertical block form and Victorian-era and Art Deco ornamentation. The property was listed in the NRHP under Criterion A for its social and commercial significance, under Criterion B for its association with Detroit real estate developer John J. Barlum, and under Criterion C as an excellent example of a Commercial Style high-rise office building.

Near the Lawyers Building, project implementation under Design Option 1 would be limited to installation of guideway alignments along the center and in the rights-of-way of Randolph and Congress streets, approximately 210 feet from the property's southwest corner and NRHP boundary. The OCS, consisting of support poles and wires, would be installed in roadway rights-of-way along the alignments.

No physical impacts to the Lawyers Building would occur; no project activity is proposed within the property's NRHP boundary. Therefore, no effects to the property's integrity of location, design, materials, and workmanship would occur.

Although the proposed guideway and OCS would be visible from the Lawyers Building under Design Option 1, these facilities represent a minor alteration to the property's visual setting. The guideway and OCS would be located south of the property along Randolph and Congress streets. Substantial, recent changes to the property's southern setting include the construction of large, non-historic parking garages at the southeast and southwest corners of Randolph and Congress streets. Therefore, no historically significant views to or from the Lawyers Building would be obscured. Because no views would be obscured, no visual effects to the property were identified. In addition, based on current information, no auditory, vibratory, or atmospheric impacts were identified for these properties. Therefore, project implementation would have no adverse effect to the property's integrity of setting.

Furthermore, although a minor alteration to the property's setting would occur, no project activity would alter the property's feeling as a Commercial Style office building, or its association with that building type, developer John J. Barlum, or the property's social and commercial significance. Therefore, project implementation would have no adverse effect to the property's integrity of feeling and association.

Based on this evaluation, the Woodward Avenue LRT Design Option 1 would have **no adverse effect** to the Lawyers Building.



Figure 15

Facing south along Randolph Street from Lawyers Building's southeast corner

130 Cadillac Square

(See Map Attachment C; see Figures 16-17)

130 Cadillac Square is an early twentieth-century four-story commercial building with a distinctive triangular footprint and characteristics and features suggestive of the Renaissance Revival style. It was determined eligible under Criterion C as a rare and good example of a triangular-shaped, late nineteenth-century commercial building in Detroit.

Near 130 Cadillac Square, project implementation under Design Option 1 would include construction of the OCS and a LRT station, including a near-grade platform and canopy structure, along the north side of Congress Street and the construction of the guideway alignment in the northernmost lane of that street. The proposed station would be located immediately south of the property's NRHP boundary and the building's south, rear elevation. The proposed OCS would be located along the north edge of Congress Street and just south of the property's NRHP boundary and south, rear elevation. The proposed alignment would be located approximately 10 feet south of the property's NRHP boundary.

No physical impacts to 130 Cadillac Square would occur; no project activity is proposed within the property's NRHP boundary. Therefore, no effects to the property's integrity of location, design, materials, and workmanship would occur under Design Option 1.

The proposed LRT station, OCS, and guideway would be visible from the rear of 130 Cadillac Square and in views to the property. The proposed LRT station and OCS would be located just south of and behind 130 Cadillac Square, approximately 10 feet from the rear elevation of the building. The proposed guideway would be embedded in the northernmost lane of Congress Street. The station would incorporate a 10- to 14-foot-tall, 100-foot-wide station shelter that may partially or wholly front 130 Cadillac Square's rear elevation. The shelter's proximity to the building would alter historically significant views to the property from the east and obscure the building's distinctive, triangular mass. Due to the proximity of the station, 130 Cadillac Square's immediate setting would be substantially altered. Based on current information, no auditory, vibratory, or atmospheric impacts have been identified for this property. Therefore, project implementation under Design Option 1 would have an adverse effect to the property's integrity of setting by obscuring historic views to the building and changing its historic setting.

An alteration to the property's setting would occur that would alter the property's feeling as an early twentieth-century commercial building with a distinctive triangular footprint. The proximity of the proposed station platform and shelter would obscure the building's distinctive triangular mass. Therefore, project implementation would have an adverse effect to the property's integrity of feeling under Design Option 1.

However, the building would still be recognizable as a late nineteenth-century commercial building in the Renaissance Revival style, and the property's association with this period and architectural style would not be affected by project implementation. Therefore, project implementation would have no effect to the property's integrity of association under Design Option 1.

Based on this evaluation, the Woodward Avenue LRT would have **an adverse effect** to 130 Cadillac Square under Design Option 1.



Figure 16

Facing east along Congress Street to Randolph Street from 130 Cadillac Square's southeast corner



Figure 17

Facing west along Congress Street to Bates Street from 130 Cadillac Square's south elevation (at right)

Vinton Building

(See Map Attachment C; see Figures 18-19)

The Vinton Building is an early twentieth-century, classically inspired, twelve-story, steel-frame commercial building designed by local architect Albert Kahn in 1917. The building was listed in the NRHP under Criteria A and C for its association with the locally prominent construction firm, the Vinton Company, and as a significant example of the work of Albert Kahn.

Near the Vinton Building, project implementation under Design Option 1 would be limited to construction of the OCS and guideway alignment in the northernmost lane of Congress Street and approximately 10 feet south of the property's NRHP boundary. The OCS, consisting of support poles and wires, would be installed in roadway rights-of-way along the alignments.

No physical impacts to the Vinton Building would occur; no project activity is proposed within the property's NRHP boundaries. Therefore, no effects to the property's integrity of location, design, materials, and workmanship would occur.

Although the proposed OCS and guideway would be visible from the south, side elevation of the Vinton Building, no historically significant views within the property's setting would be obstructed or obscured. The proposed guideway and OCS would represent minor alterations to the property's urban setting. More substantial, recent changes to the property's setting include the construction of large, non-historic structures, including a multi-story building directly south and a multi-story parking deck to the southeast; these previous changes have diminished the Vinton Building's integrity of setting, which can no longer be considered a character-defining element of the historic property. Therefore, no historically significant views to or from the property would be obscured. Because no views would be obscured, no visual effects to the property were identified. In addition, based on current information, no auditory, vibratory, or atmospheric impacts were identified for the property. Therefore, project implementation would have no adverse effect to the property's integrity of setting.

Furthermore, no project activity would alter the property's feeling as an early twentieth-century, steel-frame office building or its association with that building type, the Vinton Company, and architect Albert Kahn. Therefore, project implementation would have no adverse effect to the property's integrity of feeling and association.

Based on this evaluation, the Woodward Avenue LRT Design Option 1 would have **no adverse effect** to the Vinton Building.



Figure 18

Facing northeast along Congress Street from south, side elevation of Vinton Building (at right)



Figure 19

Facing southwest along Congress Street from south, side elevation of Vinton Building (at right)

State Savings Bank

(See Map Attachment C; see Figures 20-21)

The State Savings Bank is two-story, late nineteenth-century commercial building designed by the firm of McKim, Mead & White in the Beaux Arts style. The property was listed in the NRHP under Criteria A and C for its importance to Detroit's financial industry and for exemplifying the Beaux Arts-style work of McKim, Mead & White.

Near the State Savings Bank, project implementation under Design Option 1 would include installation of the guideway alignment and OCS in the southernmost lane of Congress Street, and construction of a side-platform LRT station west of the property. The OCS, consisting of support poles and wires, would be located along the south edge and in the right-of-way of Congress Street, approximately 40 feet from the property's south NRHP boundary. The guideway would be embedded in the southernmost lane of Congress Street, approximately 40 feet from the property's south NRHP boundary. The nearest proposed station, consisting of a near-grade platform and shelter structure would be located along the south curb and in the right-of-way of Congress Street west of Shelby Street, approximately 75 feet from the building's southeast corner and NRHP boundary.

No physical impacts to the State Savings Bank would occur; no project activity is proposed within the property's NRHP boundaries. Therefore, no effects to the property's integrity of location, design, materials, and workmanship would occur.

Significant historical views were identified in the State Savings Bank's southwest setting. The property is located within the NRHP boundary of the Detroit Financial District Historic District and additional properties to the southwest, including the Bankers Trust Company Building and the Marquette Building contribute to the district's significance and relate to the State Savings Bank as a collection of financial institutions. The proposed OCS, guideway, and station would be located adjacent to these buildings along Congress Street and would be visible from the State Savings Bank's west, rear elevation and south, side elevation. Therefore, the proposed OCS and guideway would partially obstruct and obscure historic views in the property's southwest setting. No auditory, vibratory, or atmospheric impacts were identified for this property. However, implementation of the Woodward Avenue LRT under Design Option 1 would partially obstruct and obscure historically significant views in the property's setting and would therefore result in an adverse effect to the State Savings Bank's integrity of setting.

Project activity would alter the property's feeling as a Beaux Art-style example of the work of McKim, Mead, and White and its association with that architectural style, as well as Detroit's financial history as demonstrated within its setting. Therefore, project implementation would have an adverse effect to the property's integrity of feeling and association.

Based on this evaluation, the Woodward Avenue LRT Design Option 1 would have **an adverse effect** to the State Savings Bank.



Figure 20

Facing southwest along Congress Street to contributing buildings in Detroit Financial District Historic District from State Savings Bank's southwest corner at Shelby Street



Figure 21

Facing northeast along Congress Street to contributing buildings in Detroit Financial District Historic District from State Savings Bank's southeast corner

Detroit Club

(See Map Attachment C; see Figures 22-23)

The Detroit Club is a four-and-one-half story, sandstone and red-brick building influenced by the Second Renaissance Revival and Richardsonian Romanesque styles. The property was listed in the NRHP under Criterion A for its significance in the social history of Detroit and under Criterion C as a significant example of clubhouse architecture.

Near the Detroit Club, project implementation under Design Option 1 would be limited to installation of the guideway alignment along the center and in the rights-of-way of Washington Boulevard. The OCS, consisting of support poles and wires, would be installed in roadway rights-of-way along the alignments, approximately 175 feet from the property's east, rear elevation and NRHP boundary.

No physical impacts to the Detroit Club would occur; no project activity is proposed within the property's NRHP boundary. Therefore, no effects to the property's integrity of location, design, materials, and workmanship would occur.

Although the proposed guideway and OCS would be visible from the Detroit Club's east, rear elevation and portions of the south side elevation under Design Option 1, these project facilities would represent a minor alteration to the property's visual setting in its already-altered urban environment. Significant previous alterations to the Detroit Club's southeastern setting include the construction of a non-historic high-rise office building at the southwest corner of Washington Boulevard and Fort Street. No historically significant views to or from the property would be obscured. Because no views would be obscured, no visual effects to the property were identified. In addition, based on current information, no auditory, vibratory, or atmospheric impacts were identified for these properties. Therefore, project implementation would have no effect to the property's integrity of setting.

Furthermore, no project activity would alter the property's feeling as a significant example of clubhouse architecture, or its association with that architectural type or the social history of Detroit. Therefore, project implementation would have no effect to the property's integrity of feeling and association.

Based on this evaluation, the Woodward Avenue LRT Design Option 1 would have **no effect** to the Detroit Club.



Figure 22
Facing east along Fort Street from Detroit Club's southeast corner



Figure 23
Facing northeast to Washington Boulevard from Detroit Club's southeast corner

Gabriel Richard Building

(See Map Attachment C; see Figures 24-25)

The Gabriel Richard Building is an early twentieth century, ten-story, steel-frame office building executed in the Commercial Style by the firm of Marshall & Fox. The building's style is expressed by its brick and terra-cotta cladding, large plate-glass windows, and classical design elements. The property was determined eligible to the NRHP under Criterion C as a good example of the Commercial Style and the work of Marshall & Fox.

Near the Gabriel Richard Building, project implementation under Design Option 1 would be limited to construction of the guideway alignment and OCS along Washington Boulevard. The alignment and OCS, consisting of support poles and wires, would be located in the existing median and right-of-way of Washington Boulevard, approximately 80 feet east of the property's NRHP boundary.

No physical impacts to the Gabriel Richard Building would occur; no project activity is proposed within the property's NRHP boundaries. Therefore, no effects to the property's integrity of location, design, materials, and workmanship would occur.

Although the proposed guideway and OCS would be visible from portions of the Gabriel Richard Building, no historically significant views within the property's immediate, historic setting would be obstructed or obscured. The proposed guideway and OCS would represent minor alterations to the property's greater urban setting. Because no views would be obscured, no visual impacts to the property were identified. In addition, no auditory, vibratory, or atmospheric impacts were identified for the property. Therefore, project implementation under Design Option 1 would have no adverse effect to the property's integrity of setting.

Furthermore, although a minor alteration to the property's setting would occur, no project activity would alter the property's feeling as an early twentieth-century Commercial Style office building, or its association with that building type or the firm of Marshall & Fox. Therefore, project implementation would have no adverse effect to the property's integrity of feeling and association.

Based on this evaluation, the Woodward Avenue LRT Design Option 1 would have **no adverse effect** to the Gabriel Richard Building.



Figure 24

Facing northeast across Michigan Avenue to Washington Boulevard from Gabriel Richard Building's northeast corner



Figure 25

Facing southeast along Washington Boulevard from Gabriel Richard Building's east elevation (at right)

Washington Boulevard Historic District
(See Map Attachment C; see Figure 26)

The Washington Boulevard Historic District extends three blocks along Washington Boulevard. Composed of twelve contributing buildings, from two to thirty-six stories in height, the district illustrates a range of architectural styles that include Art Deco, Beaux Arts, Chicago, Romanesque, and Tudor Gothic. The district was listed in the NRHP under Criterion A for its significance as a planned community development and its association with the City Beautiful Movement, and under Criterion C as an intact, early twentieth-century commercial streetscape.

Within the Washington Boulevard Historic District, project implementation under Design Option 1 would include installation of the guideway alignment and OCS and construction of a center-platform LRT station within and along the median of Washington Boulevard. The guideway and OCS, consisting of support poles and wires, would be installed along the boulevard's center, replacing the existing median. The proposed LRT station, consisting of a near-grade platform and shelter structure would also be constructed on the existing median, between Grand River Avenue and State Street.

No physical impacts to contributing properties within the Washington Boulevard Historic District would occur. All construction activity would take place within existing rights-of-way and on the center boulevard, which is not historic and is not a contributing element to the historic district; no project activity is proposed within the legal parcels of any contributing property. Rights-of-way within the district that would be affected by LRT construction contain non-historic reconstructed boulevards, sidewalks, trees, and roadway shoulders; these features do not contribute to the historic district's significance because the boulevards were removed and replaced with a pedestrian mall in the 1970s and reconstructed as boulevards in 2004. The current boulevards are not reconstructions of the original boulevards and differ significantly from the original designs. Therefore, no effects to the district's integrity of location, design, materials, and workmanship would occur.

Project implementation under Design Option 1 would adversely affect the Washington Boulevard Historic District's setting. Although the proposed guideway and OCS would be visible from properties within the district's boundaries, these project facilities represent a minor alteration to the district's visual setting. However, the proposed LRT station would be located in the median of the boulevard, approximately 70 feet east and west of the contributing buildings, including St. Aloysius Church on the east and the Book Building on the west. The station would represent a substantial intrusion to the open setting of this portion of the historic district and would diminish the integrity of adjacent buildings' settings and their relationships to each other. Views between these contributing properties would be obstructed or obscured by the proposed LRT station. No auditory, vibratory, or atmospheric impacts were identified for this property. However, implementation of the Woodward Avenue LRT under Design Option 1 would obstruct historically significant views and would therefore result in an adverse effect to the Washington Boulevard Historic District's integrity of setting.

Alterations to the property's setting would occur, and this project activity would alter the district's feeling as an early twentieth-century commercial district, resulting in an adverse effect to its integrity of feeling. However, its association with the historic commercial development of Downtown Detroit would not be adversely effected because the greater district will continue to convey its significant historical association.

Based on this evaluation, the Woodward Avenue LRT Design Option 1 would have an **adverse effect** to the Washington Boulevard Historic District.



Figure 26

Facing northeast along Washington Boulevard to St. Aloysius Church (at right) and contributing buildings in Washington Boulevard Historic District between State Street and Grand River Avenue

Capitol Park Historic District

(See Map Attachment C; see Figures 27-28)

Capitol Park Historic District is a large, triangular area located between Griswold Street, State Street, and Grand River Avenue. The district consists of seventeen late nineteenth-century and early twentieth-century commercial buildings, executed in a variety of styles, and a landscaped open space containing one historical marker and one monument. The district was listed in the NRHP under Criterion A for its significance in the commercial history of Detroit, and under Criterion C and Criteria Consideration F for its collection of late nineteenth and early twentieth-century architecture and commemoration of Michigan's first state governor, Stevens T. Mason.

Near the Capitol Park Historic District, project implementation under Design Option 1 would be limited to installation of guideway alignments within Grand River Avenue. The OCS, consisting of support poles and wires, would be located in the center and in the rights-of-way of Grand River Avenue.

No physical impacts to the Capitol Park Historic District would occur, as the guideway and OCS would be located in the roadway right-of-way; no project activity is proposed within the legal parcels of any contributing property. Rights-of-way within the district that would be affected by LRT guideway and OCS construction contain non-historic roadway materials; these features do not contribute to the historic district's significance. Therefore, no effects to the property's integrity of location, design, materials, and workmanship would occur.

Although the proposed guideway and OCS, which will run concurrent with the districts' northern boundary, would be visible from some contributing properties within the district, the system represents a minor alteration to the district's urban visual setting. No significant views to or from the contributing properties would be obscured. In addition, based on current information, no auditory, vibratory, or atmospheric impacts were identified for the district. Therefore, project implementation would have no adverse effect to the Capitol Park Historic District's integrity of setting.

Furthermore, although an alteration to the property's setting would occur, no project activity would alter the property's feeling as a collection of late nineteenth-century and early twentieth-century commercial buildings surrounding a park space, or its association with various architectural types and styles or the commercial history of Detroit. Therefore, project implementation would have no effect to the property's integrity of feeling and association.

Based on this evaluation, the Woodward Avenue LRT Design Option 1 would have **no adverse effect** to the Capitol Park Historic District.



Figure 27

Facing east along Grand River Avenue to Woodward Avenue from Griswold Street in Capitol Park Historic District



Figure 28

Facing west along Grand River Avenue to Washington Boulevard from Griswold Street in Capitol Park Historic District

Michigan Soldiers' and Sailors' Monument

(See Map Attachment C)

The Michigan Soldiers' and Sailors' Monument is a commemorative Civil War monument designed by sculptor Randolph Rogers and located in the southeast corner of Campus Martius Park. The massive, granite monument incorporates Neoclassical-style design elements including idealized bronze statues, simple entablatures, and Greek-inspired ornament. The monument was listed in the NRHP under Criterion C and Criteria Consideration F as an excellent example of Neoclassical-style commemorative architecture and the work of Randolph Rogers.

Under Design Option 1, no project activity is proposed near the Michigan Soldiers' and Sailors' Monument.

No physical impacts to the Michigan Soldiers' and Sailors' Monument would occur, as no portion of the proposed guideway, OCS, and LRT stations would be proximate to the monument or its NRHP boundary. Therefore, no effects to the monument's integrity of location, design, materials, and workmanship would occur.

No portion of the proposed guideway, OCS, or LRT stations would be visible from the Michigan Soldiers' and Sailors' Monument. Therefore, no views to or from the monument would be obscured. Because no views would be obscured, no visual effects to the monument were identified. In addition, based on current information, no auditory, vibratory, or atmospheric impacts were identified for the monument. Therefore, project implementation would have no effect to the monument's integrity of setting.

Furthermore, because no physical impacts or impacts to setting were identified, no effects to the monuments' integrity of feeling as a Neoclassical-style, commemorative Civil War monument or its association with that style, type of monument, or sculptor Randolph Rogers were identified.

Based on this evaluation, the Woodward Avenue LRT Design Option 1 would have **no effect** to the Michigan Soldiers' and Sailors' Monument.