

APPENDIX C

AGENCY COORDINATION



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

June 5, 2017

Mr. Gary Brown, Director
City of Detroit Water & Sewerage Dept
Wastewater Operations Group
735 Randolph St, 1st Floor
Detroit, MI 48226

Dear Mr. Brown:

The Michigan Department of Transportation (MDOT) is partnering with the Federal Highway Administration (FHWA), and the City of Detroit in the preparation of an Environmental Assessment (EA) for the I-375 corridor in Detroit, MI. The I-375 study limits are I-75 (Fisher Freeway) to the North, and Atwater Street to the South. The study limits on Jefferson Avenue are Woodward Avenue to the West, and Rivard Street to the East. The study area also includes the I-375/I-75 interchange, the Gratiot Connector, and portions of Gratiot Avenue. A map of the study area is shown on the enclosed map.

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- Enhance the transportation network and preserve safety
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Sincerely,

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Kelby Wallace, P.E.
MDOT Project Manager

Enclosure

cc: G. Ayers - MDOT
R. Bayus - MDOT
C. Warren - MDOT
M. Webb - HNTB



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

June 5, 2017

Ms. Palencia Mobley, P.E.
Deputy Director & Chief Engineer
City of Detroit Water & Sewerage Dept.
Wastewater Operations Group
735 Randolph St, 1st Floor
Detroit, MI 48226

Dear Ms. Mobley, P.E.:

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Ms. Palencia Mobley, P.E.

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MDOT Project Manager

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M. Webb - HNTB



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

June 5, 2017

Mr. Harold Ince, Jr.
Deputy Executive Director
Detroit Housing Commission
Commercial & Redevelopment Activities
1301 East Jefferson
Detroit, MI 48207

Dear Mr. Ince:

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RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

June 5, 2017

Mr. Robert Cramer
Deputy General Manager of Administration
SMART
BUHL Building
5353 Griswold St, Suite 600
Detroit, MI 48226

Dear Mr. Cramer:

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Mr. Robert Cramer
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RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

June 5, 2017

Mr. John Konik, Chief
U.S. Army - Corps of Engineers, Detroit District
Regulatory Functions Branch / Construction - Operations Div.
McNamara Bldg., 7th Floor
Detroit, MI 48231

Dear Mr. Konik:

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Mr. John Konik
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RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

June 5, 2017

Mr. Brian Grennell
Cultural Resource Management Specialist
Michigan State Historic Preservation Office / MSHDA
735 E. Michigan Ave
PO Box 30044
Lansing, MI 48909

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RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

June 5, 2017

Mr. James Watling
Transport & Flood Hazard Mgmt. Unit
Michigan Department of Environmental Quality
Water Resources Div. / Constitution Hall, 3rd Floor
Lansing, MI 48909

Dear Mr. Watling:

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Mr. James Watling
June 5, 2017
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GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
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KIRK T. STEUDLE
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June 5, 2017

Ms. Kathleen Lomako
Executive Director
Southeast Michigan Council of Governments
1001 Woodward Ave, Suite 1400
Detroit, MI 48226

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Ms. Kathleen Lomako

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GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

June 5, 2017

Ms. Carmen E. Reveron
Field Environmental Officer
U.S. Dept. of Housing & Urban Development
McNamara Federal Building
477 Michigan Ave, Room 1710
Detroit, MI 48226

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GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

June 5, 2017

Mr. Dan Dirks, Director
Detroit Department of Transportation
1301 E Warren Ave
Detroit, MI 48207

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Mr. Dan Dirks
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KIRK T. STEUDLE
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June 5, 2017

Ms. Tiffany Gunter
Interim CEO
Regional Transit Authority of SE Michigan
Southeast Michigan Council of Governments
1001 Woodward Ave, Suite 1400
Detroit, MI 48226

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Additionally, improving the connectivity for the Central Business District, riverfront, entertainment district, Eastern Market, Jefferson/Gratiot Avenues, and the surrounding neighborhoods is essential.

The analysis of the alternatives in the EA, along with this agency coordination, and public involvement will lead to the identification of a Preferred Alternative. Funding for construction has been identified for 2022 in MDOT's Five -Year Transportation Program, and the project is now on track for environmental clearance subject to the National Environmental Policy Act.

This early coordination seeks input from interested agencies, and both the MDOT and the City of Detroit requests your comments on this study, as it relates to:

- Specific areas of concern
- Available technical information for the area of potential effects; and
- Permits or mitigation requirements which may need to be considered as we are now in the NEPA phase.
- An identified single point of contact for this study that can represent your agency in future meeting

Ms. Tiffany Gunter
June 5, 2017
Page 2

The study team would appreciate your assistance in directing this request to all staff within your organization to provide an "agency" response. The study is scheduled to be completed early 2018, so we request a response within 30 days. If you need additional information or have questions, please contact Mr. Kelby Wallace at (517) 643-1322, or via email at wallacek@michigan.gov. A study website has also been developed at www.michigan.gov/i375study. The materials from the PEL study and our recent initial public meeting has recently been posted and the site will continue to be updated as the study progresses.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kelby Wallace', written in a cursive style.

Kelby Wallace, P.E.
MDOT Project Manager

Enclosure

cc: G. Ayers - MDOT
R. Bayus - MDOT
C. Warren - MDOT
M. Webb - HNTB



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

June 5, 2017

Ms. Brooke Merrell
Regional Environmental Coordinator
National Park Service - Midwest Region
601 Riverfront Drive
Omaha, NE 68102

Dear Ms. Merrell:

The Michigan Department of Transportation (MDOT) is partnering with the Federal Highway Administration (FHWA), and the City of Detroit in the preparation of an Environmental Assessment (EA) for the I-375 corridor in Detroit, MI. The I-375 study limits are I-75 (Fisher Freeway) to the North, and Atwater Street to the South. The study limits on Jefferson Avenue are Woodward Avenue to the West, and Rivard Street to the East. The study area also includes the I-375/I-75 interchange, the Gratiot Connector, and portions of Gratiot Avenue. A map of the study area is shown on the enclosed map.

A Planning and Environmental Linkage (PEL) study to develop a purpose and need, and Illustrative Alternatives was conducted in 2014, and are the starting point for this EA. The Illustrative Alternatives developed support the key goals of:

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Ms. Brooke Merrell

June 5, 2017

Page 2

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Sincerely,



Kelby Wallace, P.E.
MDOT Project Manager

Enclosure

cc: G. Ayers - MDOT
R. Bayus - MDOT
C. Warren - MDOT
M. Webb - HNTB



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

June 5, 2017

Mr. Nick Lyon, Deputy Director
Michigan Dept. of Community Health
Health Policy, Regulation & Professions Admin
Capital View Building
201 Townsend
Lansing, MI 48913

Dear Mr. Lyon:

The Michigan Department of Transportation (MDOT) is partnering with the Federal Highway Administration (FHWA), and the City of Detroit in the preparation of an Environmental Assessment (EA) for the I-375 corridor in Detroit, MI. The I-375 study limits are I-75 (Fisher Freeway) to the North, and Atwater Street to the South. The study limits on Jefferson Avenue are Woodward Avenue to the West, and Rivard Street to the East. The study area also includes the I-375/I-75 interchange, the Gratiot Connector, and portions of Gratiot Avenue. A map of the study area is shown on the enclosed map.

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Mr. Nick Lyon
June 5, 2017
Page 2

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Kelby Wallace, P.E.
MDOT Project Manager

Enclosure

cc: G. Ayers - MDOT
R. Bayus - MDOT
C. Warren - MDOT
M. Webb - HNTB



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

June 5, 2017

Mr. Keith Creagh, Director
Michigan Dept. of Natural Resources
Constitution Hall, 5th Floor
PO Box 30028
Lansing, MI 48909

Dear Mr. Creagh:

The Michigan Department of Transportation (MDOT) is partnering with the Federal Highway Administration (FHWA), and the City of Detroit in the preparation of an Environmental Assessment (EA) for the I-375 corridor in Detroit, MI. The I-375 study limits are I-75 (Fisher Freeway) to the North, and Atwater Street to the South. The study limits on Jefferson Avenue are Woodward Avenue to the West, and Rivard Street to the East. The study area also includes the I-375/I-75 interchange, the Gratiot Connector, and portions of Gratiot Avenue. A map of the study area is shown on the enclosed map.

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Mr. Keith Creagh

June 5, 2017

Page 2

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Kelby Wallace, P.E.
MDOT Project Manager

Enclosure

cc: G. Ayers - MDOT
R. Bayus - MDOT
C. Warren - MDOT
M. Webb - HNTB



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

June 5, 2017

Mr. Kenneth A. Westlake, Supervisor
U.S. Environmental Protection Agency / NEPA Implementation
Office of Enforcement & Compliance Assurance
Region 5, E-19J, 77 W Jackson Blvd
Chicago, IL 60604

Dear Mr. Westlake:

The Michigan Department of Transportation (MDOT) is partnering with the Federal Highway Administration (FHWA), and the City of Detroit in the preparation of an Environmental Assessment (EA) for the I-375 corridor in Detroit, MI. The I-375 study limits are I-75 (Fisher Freeway) to the North, and Atwater Street to the South. The study limits on Jefferson Avenue are Woodward Avenue to the West, and Rivard Street to the East. The study area also includes the I-375/I-75 interchange, the Gratiot Connector, and portions of Gratiot Avenue. A map of the study area is shown on the enclosed map.

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Mr. Kenneth A. Westlake

June 5, 2017

Page 2

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Kelby Wallace, P.E.
MDOT Project Manager

Enclosure

cc: G. Ayers - MDOT
R. Bayus - MDOT
C. Warren - MDOT
M. Webb - HNTB



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

June 5, 2017

Mr. Scott Hicks, Field Supervisor
U.S. Department of Interior
Fish & Wildlife Service
2651 Coolidge Rd, Suite 101
East Lansing, MI 48823

Dear Mr. Hicks:

The Michigan Department of Transportation (MDOT) is partnering with the Federal Highway Administration (FHWA), and the City of Detroit in the preparation of an Environmental Assessment (EA) for the I-375 corridor in Detroit, MI. The I-375 study limits are I-75 (Fisher Freeway) to the North, and Atwater Street to the South. The study limits on Jefferson Avenue are Woodward Avenue to the West, and Rivard Street to the East. The study area also includes the I-375/I-75 interchange, the Gratiot Connector, and portions of Gratiot Avenue. A map of the study area is shown on the enclosed map.

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Mr. Scott Hicks
June 5, 2017
Page 2

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Kelby Wallace, P.E.
MDOT Project Manager

Enclosure

cc: G. Ayers - MDOT
R. Bayus - MDOT
C. Warren - MDOT
M. Webb - HNTB



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

June 5, 2017

Mr. Earl Poleski
Executive Director
Michigan State Housing Development Authority
735 E Michigan Ave
Lansing, MI 48909

Dear Mr. Poleski:

The Michigan Department of Transportation (MDOT) is partnering with the Federal Highway Administration (FHWA), and the City of Detroit in the preparation of an Environmental Assessment (EA) for the I-375 corridor in Detroit, MI. The I-375 study limits are I-75 (Fisher Freeway) to the North, and Atwater Street to the South. The study limits on Jefferson Avenue are Woodward Avenue to the West, and Rivard Street to the East. The study area also includes the I-375/I-75 interchange, the Gratiot Connector, and portions of Gratiot Avenue. A map of the study area is shown on the enclosed map.

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Mr. Earl Poleski

June 5, 2017

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Kelby Wallace, P.E.
MDOT Project Manager

Enclosure

cc: G. Ayers - MDOT
R. Bayus - MDOT
C. Warren - MDOT
M. Webb - HNTB



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

June 5, 2017

Ms. Anika Goss-Foster
Executive Director
Detroit Future City
2900 W. Grand Blvd., Suite 2
Detroit, MI 48202

Dear Ms. Goss-Foster:

The Michigan Department of Transportation (MDOT) is partnering with the Federal Highway Administration (FHWA), and the City of Detroit in the preparation of an Environmental Assessment (EA) for the I-375 corridor in Detroit, MI. The I-375 study limits are I-75 (Fisher Freeway) to the North, and Atwater Street to the South. The study limits on Jefferson Avenue are Woodward Avenue to the West, and Rivard Street to the East. The study area also includes the I-375/I-75 interchange, the Gratiot Connector, and portions of Gratiot Avenue. A map of the study area is shown on the enclosed map.

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Ms. Anika Goss-Foster

June 5, 2017

Page 2

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Kelby Wallace, P.E.
MDOT Project Manager

Enclosure

cc: G. Ayers - MDOT
R. Bayus - MDOT
C. Warren - MDOT
M. Webb - HNTB



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

June 27, 2017

Ms. Paula Carrick
12140 W. Lakeshore Drive
Brimley, MI 49715

Dear Ms. Carrick:

Section 106 Consultation Invitation Request for Participation in the
Environmental Assessment for I-375 Corridor Study
City of Detroit, Wayne County, Michigan

The Michigan Department of Transportation (MDOT) is partnering with the Federal Highway Administration (FHWA) and the City of Detroit to prepare an Environmental Assessment (EA) for the I-375 Corridor in Detroit, MI.

A Planning and Environmental Linkage (PEL) study to develop Illustrative Alternatives was conducted in 2014 and is the starting point for this EA. The Illustrative Alternatives support the following key goals to:

- Enhance the transportation network and preserve safety.
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- Preserve environmental resources.

Additionally, the PEL study sought ways to improve the connectivity for the Central Business District, riverfront, entertainment district, Eastern Market, Jefferson/Gratiot Avenues and the surrounding neighborhoods. Maps of the six alternatives identified by the PEL study will be the subject of the EA and are attached.

The analysis of the alternatives in the EA will lead to the identification of a Preferred Alternative. Funding for construction has been identified for 2022 in MDOT's Five -Year Transportation Program. The project is now on track for environmental clearance, subject to the National Environmental Policy Act.

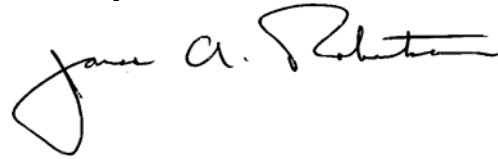
Previous research and archaeological investigations within, and adjacent to, the corridors being studied documented eight historic period Euro-American archaeological sites (20WN321, 20WN323, 20WN324, 20WN325, 20WN430, 20WN431, 20WN1055, and 20WN1076). One of those sites, a mid-nineteenth century working class neighborhood, site 20WN1055, was the subject of data recovery excavations by MDOT in 2002.

On behalf of the Federal Highway Administration, MDOT respectfully invites the Bay Mills Indian Community to participate in formal Section 106 consultation regarding traditional cultural

and/or religious places and/or other significant sites that you are concerned may be affected by this proposed project.

I would be happy to discuss this project with you in more detail over the phone, or in person. Please do not hesitate to contact me at 517-335-2637, robertsonj3@michigan.gov and/or by mail at 425 West Ottawa Street, Lansing, Michigan 48909.

Sincerely,

A handwritten signature in black ink, appearing to read "James A. Robertson". The signature is fluid and cursive, with a large initial "J" and "R".

James A. Robertson, Ph.D.
Staff Archaeologist
Environmental Services Section

Attachments

cc: Arnita Furgason (FHWA)
Claire Stevens (MDOT)
Geraldyn Ayers (MDOT)

Alternate 1 - Reconstructed Freeway As Is



VEHICULAR TRAFFIC OPERATIONS, SAFETY AND CONNECTIVITY

- Improvements to southbound off-ramp operations and safety
- Minimal changes to traffic operations or travel time
- No changes in connectivity
- No additional safety improvements to identified issues within the study area

ESTIMATED VEHICULAR TRAVEL TIMES



COST AND ECONOMIC IMPACT

- Minimal positive impact due to replacement infrastructure and modest improvements in traffic flow at ramps
- High long-term operations and maintenance costs due to continued presence of bridges (over 60,000 square feet of bridge area), pump station and related infrastructure

ESTIMATED TOTAL COST

\$60-70M

ECONOMIC IMPACT POTENTIAL



NON-MOTORIZED TRANSPORTATION AND TRANSIT

- No changes to non-motorized travel
- No changes to transit accessibility

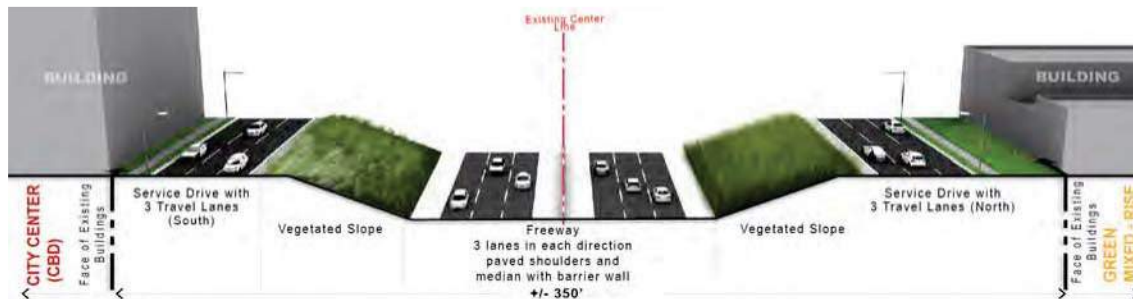
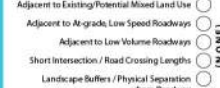
NON-MOTORIZED (SHARED USE PATHS/BIKE LANES)



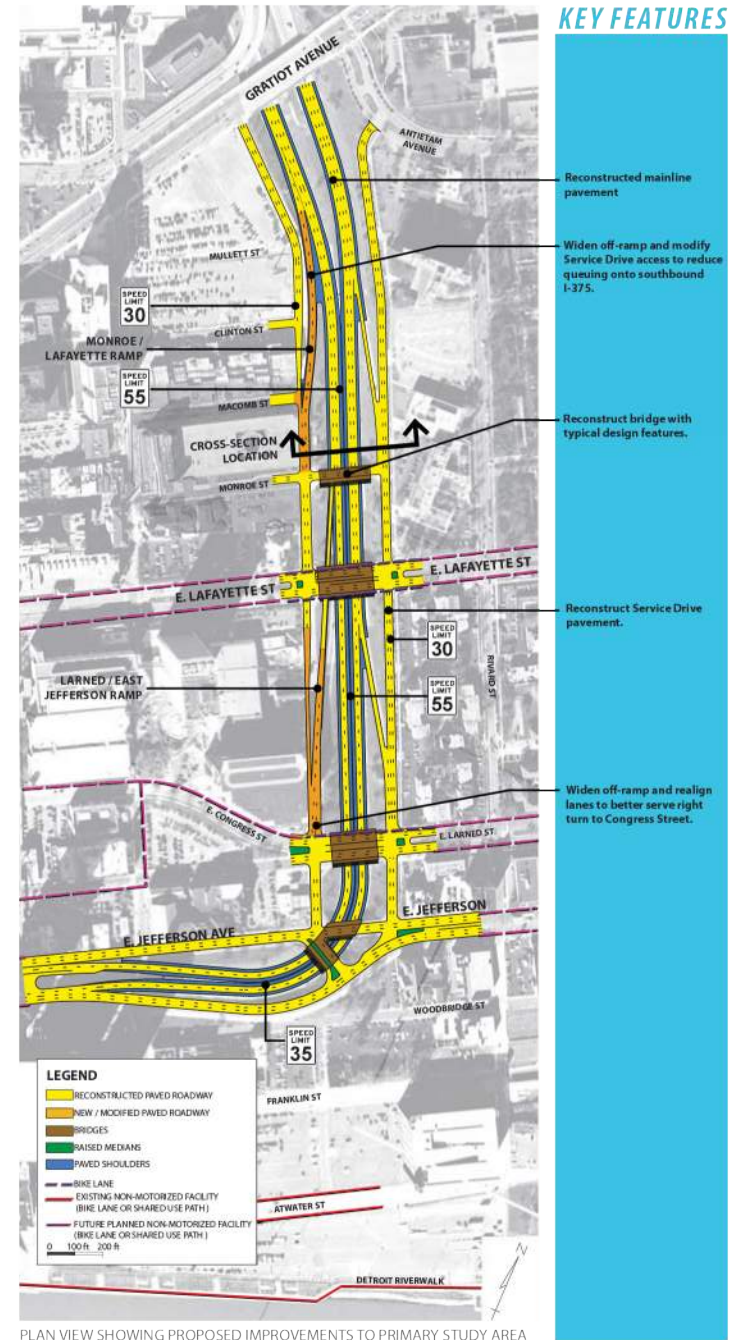
QUALITY OF LIFE AND ENVIRONMENTAL RESOURCES

- No changes to quality of life in adjacent districts
- No changes to water quality
- No changes to the non-motorized experience and the character of adjacent districts
- No anticipated changes in air quality or noise impacts

PEDESTRIAN SIDEWALKS



CROSS-SECTION LOOKING NORTH SHOWING PROPOSED CONDITIONS



KEY FEATURES

- Reconstructed mainline pavement
- Widen off-ramp and modify Service Drive access to reduce queuing onto southbound I-375.
- Reconstruct bridge with typical design features.
- Reconstruct Service Drive pavement.
- Widen off-ramp and realign lanes to better serve right turn to Congress Street.

Alternate 2 - Reconstructed Freeway with Riverfront Connection



VEHICULAR TRAFFIC OPERATIONS, SAFETY AND CONNECTIVITY

- Improvements to southbound off-ramp operations and safety
- Improved connectivity to riverfront via new roadway from East Jefferson
- Greater traffic volumes on East Jefferson/I-375 service drive intersections to serve new riverfront connection
- Greater connectivity between I-75 and Gratiot via Madison ramps
- No changes to east/west connectivity
- No additional safety improvements to issues identified within the study area
- No changes to complicated geometry at I-375 southbound service drive/East Jefferson signalized intersections

ESTIMATED VEHICULAR TRAVEL TIMES



COST AND ECONOMIC IMPACT

- Improved access to RiverEast development areas
- Minimal positive economic impact within or adjacent to the corridor due to limited infrastructure changes and no creation of residual land
- High long-term operations and maintenance costs due to continued presence of bridges (over 60,000 square feet of bridge area), pump station, and additional streetscape elements.

ESTIMATED TOTAL COST



NON-MOTORIZED TRANSPORTATION AND TRANSIT

- Pedestrian environment along service drives enhanced through bike lanes and streetscape
- Improved north/south bike connections between the riverfront and Eastern Market
- Improved access to existing transit routes (Gratiot, Lafayette and East Jefferson) with defined bike route
- Non-motorized experience would continue to be impacted by high vehicle speeds within the corridor
- New East Jefferson Ave. pedestrian crossing at the I-375 corridor would be challenged by high traffic volumes, turning movements and long crossing distances

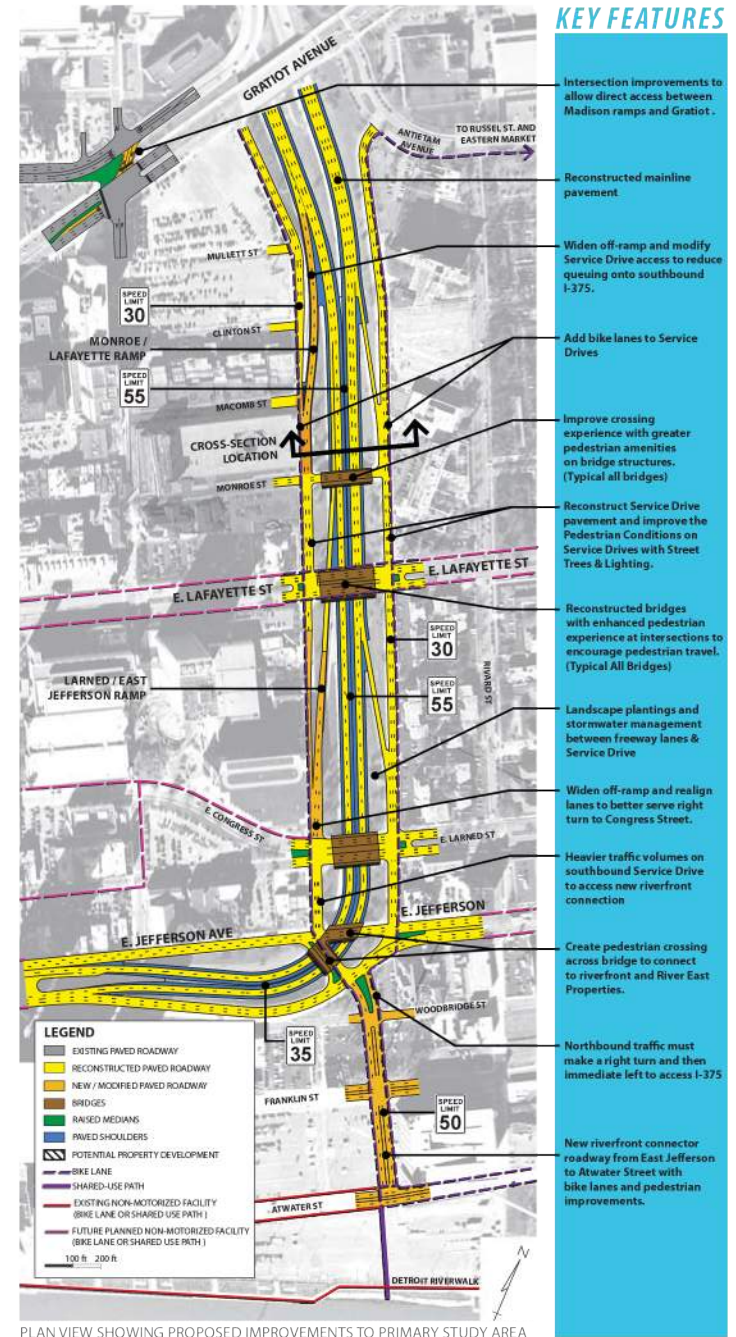
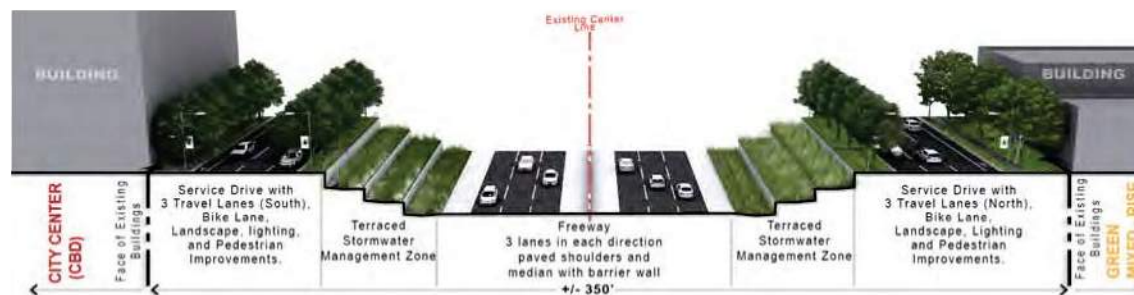
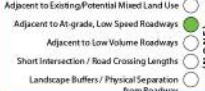
NON-MOTORIZED (SHARED USE PATHS/BIKE LANES)



QUALITY OF LIFE AND ENVIRONMENTAL RESOURCES

- Minimal change to quality of life in adjacent districts
- Storm water management protects Detroit River asset
- Displacement of some private properties (surface parking facilities and a billboard) due to the riverfront connection
- No expected changes in air quality or noise impacts, but further investigation might be needed due to additional exiting traffic for new riverfront connection

PEDESTRIAN SIDEWALKS



KEY FEATURES

- Intersection improvements to allow direct access between Madison ramps and Gratiot.
- Reconstructed mainline pavement
- Widen off-ramp and modify Service Drive access to reduce queuing onto southbound I-375.
- Add bike lanes to Service Drives
- Improve crossing experience with greater pedestrian amenities on bridge structures. (Typical all bridges)
- Reconstruct Service Drive pavement and improve the Pedestrian Conditions on Service Drives with Street Trees & Lighting.
- Reconstructed bridges with enhanced pedestrian experience at intersections to encourage pedestrian travel. (Typical All Bridges)
- Landscape plantings and stormwater management between freeway lanes & Service Drive
- Widen off-ramp and realign lanes to better serve right turn to Congress Street.
- Heavier traffic volumes on southbound Service Drive to access new riverfront connection
- Create pedestrian crossing across bridge to connect to riverfront and River East Properties.
- Northbound traffic must make a right turn and then immediate left to access I-375
- New riverfront connector roadway from East Jefferson to Atwater Street with bike lanes and pedestrian improvements.

Alternate 3 - Freeway Transitions to Surface Street at Larned



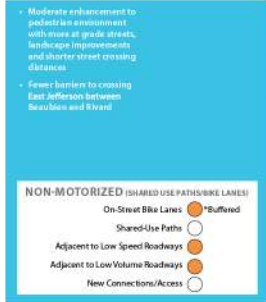
VEHICULAR TRAFFIC OPERATIONS, SAFETY AND CONNECTIVITY



COST AND ECONOMIC IMPACT



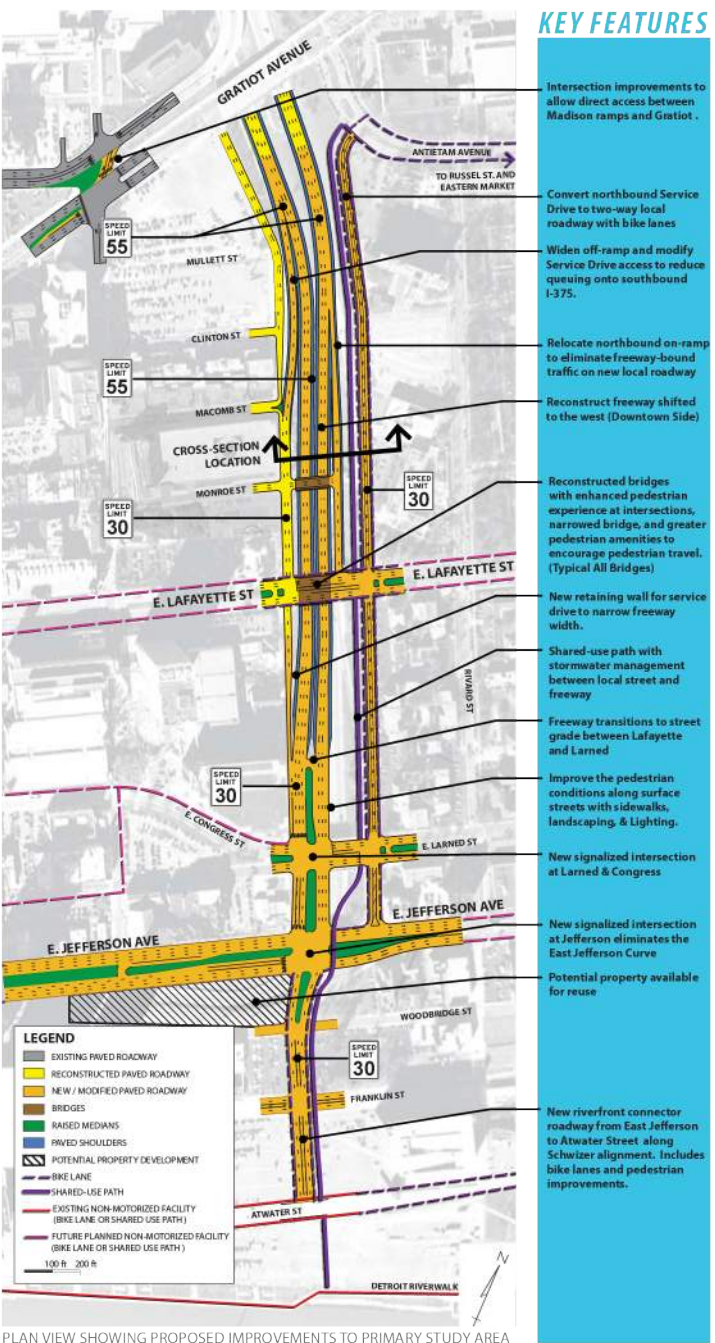
NON-MOTORIZED TRANSPORTATION AND TRANSIT



QUALITY OF LIFE AND ENVIRONMENTAL RESOURCES



CROSS-SECTION LOOKING NORTH SHOWING PROPOSED CONDITIONS



PLAN VIEW SHOWING PROPOSED IMPROVEMENTS TO PRIMARY STUDY AREA

Alternate 4 - East Edge Boulevard



VEHICULAR TRAFFIC OPERATIONS, SAFETY AND CONNECTIVITY

- Significantly improves street connectivity into the northeast corner of downtown with new access created to Clinton and Macomb
- Improved direct connectivity to riverfront and East Jefferson
- Replaces sharp curve at Jefferson with at-grade signalized intersection, with indirect left turns ("Michigan left") for southbound and westbound left turns
- Improves existing access with southbound right turn to Congress
- No southbound left turn allowed onto southbound Larned movement can be made at Lafayette and East Jefferson
- Requires drive away exit ramps for property access on west edge of boulevard for properties only accessible from service drive today
- Greater connectivity between I-75 and Gratiot via Madison ramps

ESTIMATED VEHICULAR TRAVEL TIMES IN MINUTES



COST AND ECONOMIC IMPACT

- Improved access to its east development areas, served as a primary no turnout without requiring freeway exit
- Development of potential residual land may only be feasible if pursued by adjacent existing land owners. Otherwise, development potential may be limited due to parcel size, orientation and multiple required driveway connections
- Lower overall long-term operation and maintenance costs due to narrowing of roadway footprint and elimination of bridges, although some additional costs related to green space and streetscape
- Cost and complexity of relocation of utilities currently under the southbound service drive

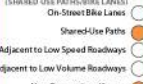
ESTIMATED TOTAL COST:



NON-MOTORIZED TRANSPORTATION AND TRANSIT

- Moderate enhancement to pedestrian sidewalks with more surface streets, landscape improvements and shorter street crossing distances
- Fewer crossing barriers at Jefferson
- Pedestrian crossings of new boulevard may require intermediate stop at refuge islands due to roadway width
- Strong north-south linkway connection via shared use path
- Improved access to transit (along Gratiot, Lafayette and East Jefferson) with defined bike way route

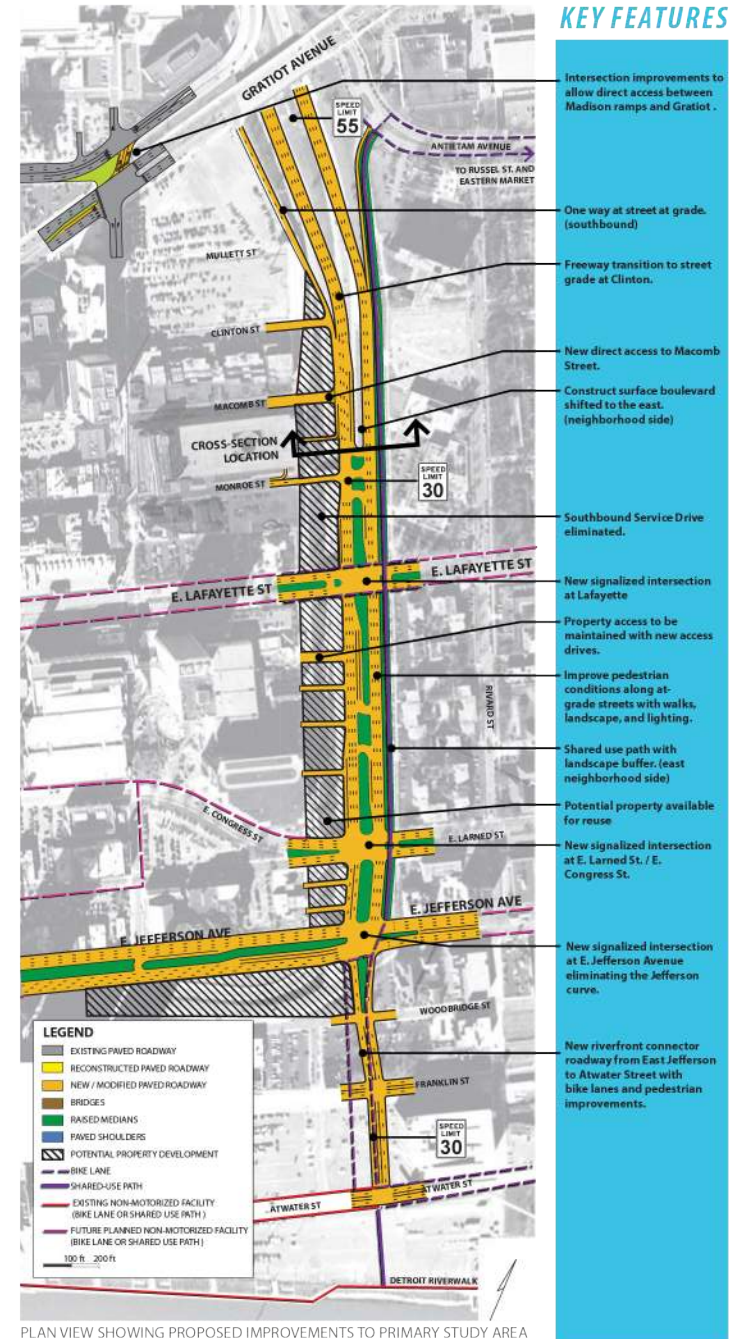
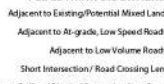
NON-MOTORIZED (SHARED USE PATH/BIKE LANES)



QUALITY OF LIFE AND ENVIRONMENTAL RESOURCES

- More balanced multi-modal use of corridor and improved aesthetics along residential street edge
- Moves major thoroughfare closer to residential neighborhood with limited physical buffer
- Potential for active pedestrian-oriented street edge along new development on west edge should front-facing development towards the I-75 corridor occur
- Limited opportunity for storm water management
- Refined vehicle design speeds improve non-motorized experience and adjacent districts character
- Displacement of some private property (as low as parking facilities and a billboard) due to riverfront connection
- Further investigation of air and noise impacts may be needed due to the new roadway alignment and new intersections, but slower speeds are expected to decrease the noise levels

PEDESTRIAN SIDEWALKS



PLAN VIEW SHOWING PROPOSED IMPROVEMENTS TO PRIMARY STUDY AREA

Alternate 5 - West Edge Boulevard



VEHICULAR TRAFFIC OPERATIONS, SAFETY AND CONNECTIVITY

- Improves street connectivity into downtown with new access created to Clinton and Macomb.
- Improved, direct connectivity to riverfront and East Jefferson.
- Reduces sharp curve at Jefferson with all-grade signalized intersection, with indirect left turn ("diagonal left") for southbound and westbound left turns.
- No southbound left-turn allowed onto eastbound, indirect movement can be made at Lafayette and East Jefferson.
- Greater connectivity between E. Jefferson and E. Lafayette via Madison ramp.

ESTIMATED VEHICULAR TRAVEL TIMES



COST AND ECONOMIC IMPACT

- Improved access to riverfront development area, served as a primary movement link without requiring freeway exit.
- Reuse of potential residual land for public space may have a positive economic impact on adjacent properties.
- Long-term land use and redevelopment opportunities are strongest to east side of the corridor, making potential residual land a strategic asset.
- Some residual land for potential redevelopment along East Jefferson.
- Lower overall long-term operations and maintenance costs due to compacting of roadway footprint and elimination of bridges, although some additional costs related to green space and streetlights.

ESTIMATED TOTAL COST:

\$45-\$55M

ECONOMIC IMPACT POTENTIAL:



NON-MOTORIZED TRANSPORTATION AND TRANSIT

- Moderate enhancement to pedestrian movement with more surface streets, lower vehicle speeds, landscape improvements and shorter street crossing distances.
- Fewer crossing barriers at East Jefferson between Jefferson and Atwater.
- Strong north-south bikeway connection via two-way local street.
- Improved access to transit (along Gratiot, Lafayette and East Jefferson) with defined bikeway routes.

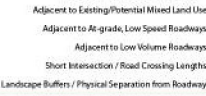
NON-MOTORIZED (SHARED-USE PATHS/BIKE LANES)



QUALITY OF LIFE AND ENVIRONMENTAL RESOURCES

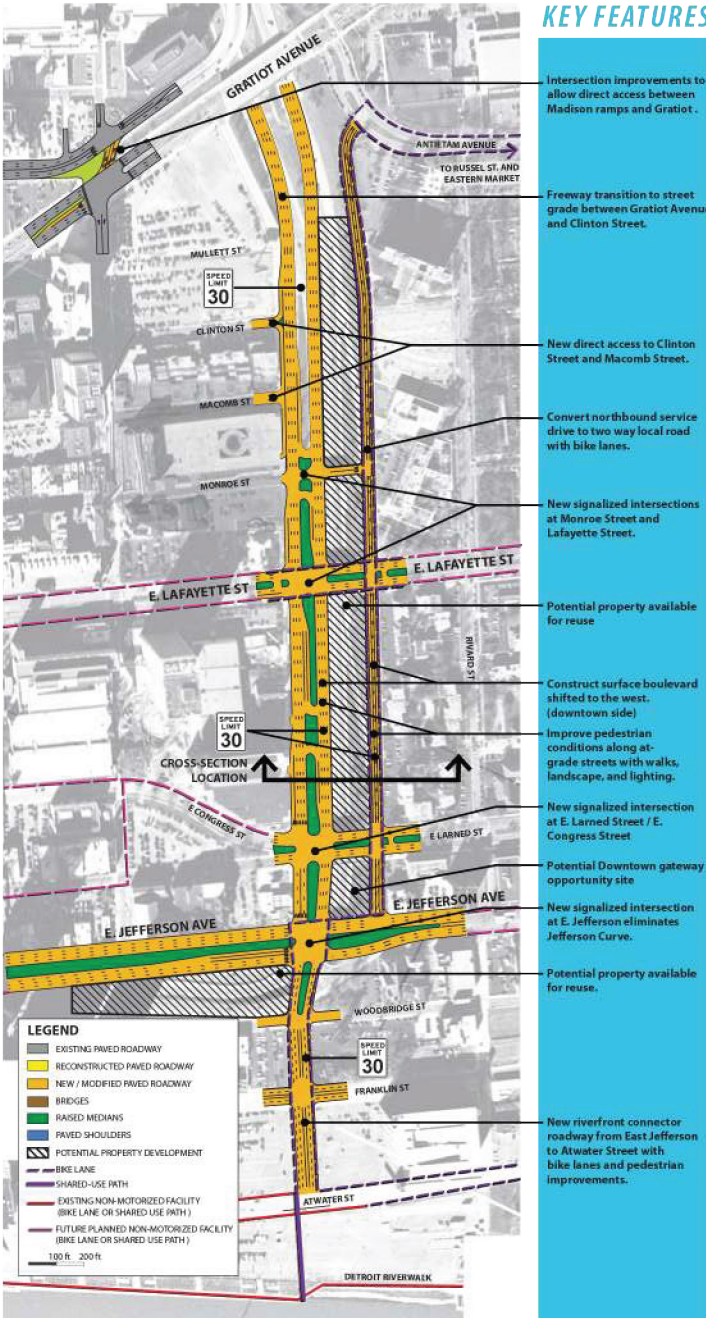
- More bold and multi-modal use of corridor along east edge more consistent with residential area, with improved aesthetics.
- Minimal change to quality of life along west edge.
- Significant opportunity for public space asset and long-term street activation development.
- Reduced vehicle speeds improve adjacent streets character.
- Shifts major traffic flows away from west side residential neighborhood, providing a buffer.
- Displacement of some private properties (surface parking facilities) due to overport connections.
- Further investigation of air and noise impacts may be needed due to the new roadway alignment and new intersections, but slower speeds are expected to decrease the noise levels.

PEDESTRIAN SIDEWALKS



CROSS-SECTION LOOKING NORTH SHOWING PROPOSED CONDITIONS

KEY FEATURES



PLAN VIEW SHOWING PROPOSED IMPROVEMENTS TO PRIMARY STUDY AREA

EURO 375



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

June 27, 2017

Ms. Cindy Winslow
2605 N. West Bayshore Dr.
Suttons Bay, MI 49682

Dear Ms. Winslow:

Section 106 Consultation Invitation Request for Participation in the
Environmental Assessment for I-375 Corridor Study
City of Detroit, Wayne County, Michigan

The Michigan Department of Transportation (MDOT) is partnering with the Federal Highway Administration (FHWA) and the City of Detroit to prepare an Environmental Assessment (EA) for the I-375 Corridor in Detroit, MI.

A Planning and Environmental Linkage (PEL) study to develop Illustrative Alternatives was conducted in 2014 and is the starting point for this EA. The Illustrative Alternatives support the following key goals to:

- Enhance the transportation network and preserve safety.
- Support or enhance community quality of life.
- Enhance economic opportunities.
- Preserve environmental resources.

Additionally, the PEL study sought ways to improve the connectivity for the Central Business District, riverfront, entertainment district, Eastern Market, Jefferson/Gratiot Avenues and the surrounding neighborhoods. Maps of the six alternatives identified by the PEL study will be the subject of the EA and are attached.

The analysis of the alternatives in the EA will lead to the identification of a Preferred Alternative. Funding for construction has been identified for 2022 in MDOT's Five -Year Transportation Program. The project is now on track for environmental clearance, subject to the National Environmental Policy Act.

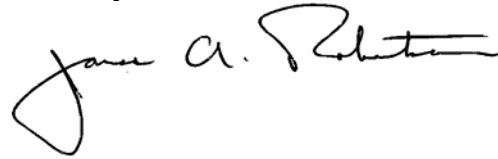
Previous research and archaeological investigations within, and adjacent to, the corridors being studied documented eight historic period Euro-American archaeological sites (20WN321, 20WN323, 20WN324, 20WN325, 20WN430, 20WN431, 20WN1055, and 20WN1076). One of those sites, a mid-nineteenth century working class neighborhood, site 20WN1055, was the subject of data recovery excavations by MDOT in 2002.

On behalf of the Federal Highway Administration, MDOT respectfully invites the Grand Traverse Band of Ottawa and Chippewa Indians to participate in formal Section 106 consultation

regarding traditional cultural and/or religious places and/or other significant sites that you are concerned may be affected by this proposed project.

I would be happy to discuss this project with you in more detail over the phone, or in person. Please do not hesitate to contact me at 517-335-2637, robertsonj3@michigan.gov and/or by mail at 425 West Ottawa Street, Lansing, Michigan 48909.

Sincerely,

A handwritten signature in black ink, appearing to read "James A. Robertson". The signature is fluid and cursive, with a large initial "J" and "R".

James A. Robertson, Ph.D.
Staff Archaeologist
Environmental Services Section

Attachments

cc: Arnita Furgason (FHWA)
Claire Stevens (MDOT)
Geraldyn Ayers (MDOT)



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

June 27, 2017

Mr. Earl Meshigaud
N-14911 Hannahville, B1 Road
Wilson, MI 49896-9717

Dear Mr. Meshigaud:

Section 106 Consultation Invitation Request for Participation in the
Environmental Assessment for I-375 Corridor Study
City of Detroit, Wayne County, Michigan

The Michigan Department of Transportation (MDOT) is partnering with the Federal Highway Administration (FHWA) and the City of Detroit to prepare an Environmental Assessment (EA) for the I-375 Corridor in Detroit, MI.

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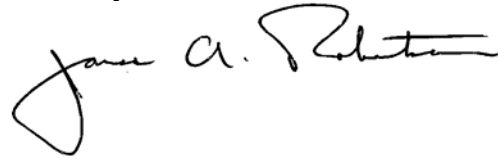
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On behalf of the Federal Highway Administration, MDOT respectfully invites the Hannahville Indian Community to participate in formal Section 106 consultation regarding traditional cultural

and/or religious places and/or other significant sites that you are concerned may be affected by this proposed project.

I would be happy to discuss this project with you in more detail over the phone, or in person. Please do not hesitate to contact me at 517-335-2637, robertsonj3@michigan.gov and/or by mail at 425 West Ottawa Street, Lansing, Michigan 48909.

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Geraldyn Ayers (MDOT)



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

June 27, 2017

Mr. Gary Loonsfoot, Jr.
16429 Bear Town Road
Baraga, Michigan 49908

Dear Mr. Loonsfoot:

Section 106 Consultation Invitation Request for Participation in the
Environmental Assessment for I-375 Corridor Study
City of Detroit, Wayne County, Michigan

The Michigan Department of Transportation (MDOT) is partnering with the Federal Highway Administration (FHWA) and the City of Detroit to prepare an Environmental Assessment (EA) for the I-375 Corridor in Detroit, MI.

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Additionally, the PEL study sought ways to improve the connectivity for the Central Business District, riverfront, entertainment district, Eastern Market, Jefferson/Gratiot Avenues and the surrounding neighborhoods. Maps of the six alternatives identified by the PEL study will be the subject of the EA and are attached.

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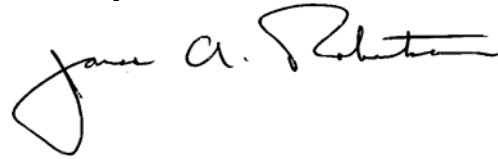
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On behalf of the Federal Highway Administration, MDOT respectfully invites the Keweenaw Bay Indian Community to participate in formal Section 106 consultation regarding traditional

cultural and/or religious places and/or other significant sites that you are concerned may be affected by this proposed project.

I would be happy to discuss this project with you in more detail over the phone, or in person. Please do not hesitate to contact me at 517-335-2637, robertsonj3@michigan.gov and/or by mail at 425 West Ottawa Street, Lansing, Michigan 48909.

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Staff Archaeologist
Environmental Services Section

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Geraldyn Ayers (MDOT)



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

June 27, 2017

Mr. Jay Sam
375 River Street
Manistee, MI 49660

Dear Mr. Sam:

Section 106 Consultation Invitation Request for Participation in the
Environmental Assessment for I-375 Corridor Study
City of Detroit, Wayne County, Michigan

The Michigan Department of Transportation (MDOT) is partnering with the Federal Highway Administration (FHWA) and the City of Detroit to prepare an Environmental Assessment (EA) for the I-375 Corridor in Detroit, MI.

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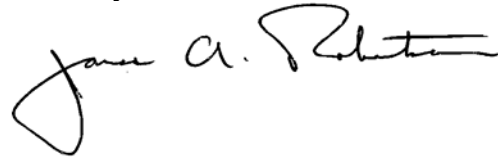
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On behalf of the Federal Highway Administration, MDOT respectfully invites the Little River Band of Ottawa Indians to participate in formal Section 106 consultation regarding traditional

cultural and/or religious places and/or other significant sites that you are concerned may be affected by this proposed project.

I would be happy to discuss this project with you in more detail over the phone, or in person. Please do not hesitate to contact me at 517-335-2637, robertsonj3@michigan.gov and/or by mail at 425 West Ottawa Street, Lansing, Michigan 48909.

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Geraldyn Ayers (MDOT)



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

June 27, 2017

Mr. Wesley Andrews
7500 Odawa Circle
Harbor Springs, MI 49740

Dear Mr. Andrews:

Section 106 Consultation Invitation Request for Participation in the
Environmental Assessment for I-375 Corridor Study
City of Detroit, Wayne County, Michigan

The Michigan Department of Transportation (MDOT) is partnering with the Federal Highway Administration (FHWA) and the City of Detroit to prepare an Environmental Assessment (EA) for the I-375 Corridor in Detroit, MI.

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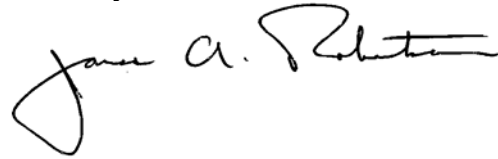
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On behalf of the Federal Highway Administration, MDOT respectfully invites the Little Traverse Bay Bands of Odawa Indians to participate in formal Section 106 consultation regarding

traditional cultural and/or religious places and/or other significant sites that you are concerned may be affected by this proposed project.

I would be happy to discuss this project with you in more detail over the phone, or in person. Please do not hesitate to contact me at 517-335-2637, robertsonj3@michigan.gov and/or by mail at 425 West Ottawa Street, Lansing, Michigan 48909.

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RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

June 27, 2017

Ms. Daisy McGeshick
P.O. Box 249
Watersmeet, MI 49969

Dear Ms. McGeshick:

Section 106 Consultation Invitation Request for Participation in the
Environmental Assessment for I-375 Corridor Study
City of Detroit, Wayne County, Michigan

The Michigan Department of Transportation (MDOT) is partnering with the Federal Highway Administration (FHWA) and the City of Detroit to prepare an Environmental Assessment (EA) for the I-375 Corridor in Detroit, MI.

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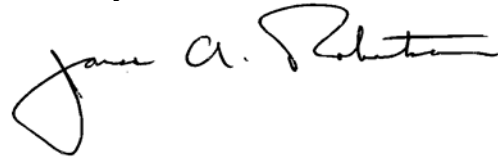
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On behalf of the Federal Highway Administration, MDOT respectfully invites the Lac Vieux Desert Band of Lake Superior Chippewa Indians to participate in formal Section 106

consultation regarding traditional cultural and/or religious places and/or other significant sites that you are concerned may be affected by this proposed project.

I would be happy to discuss this project with you in more detail over the phone, or in person. Please do not hesitate to contact me at 517-335-2637, robertsonj3@michigan.gov and/or by mail at 425 West Ottawa Street, Lansing, Michigan 48909.

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Geraldyn Ayers (MDOT)



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

June 27, 2017

Ms. Lorraine Shananaquet
2882 Mission Drive
Shelbyville, MI 49344

Dear Ms. Shananaquet:

Section 106 Consultation Invitation Request for Participation in the
Environmental Assessment for I-375 Corridor Study
City of Detroit, Wayne County, Michigan

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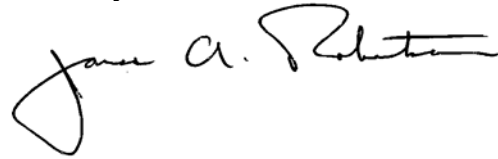
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On behalf of the Federal Highway Administration, MDOT respectfully invites the Match-e-be-nash-she-wish Band of Pottawatomi Indians to participate in formal Section 106 consultation

regarding traditional cultural and/or religious places and/or other significant sites that you are concerned may be affected by this proposed project.

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RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

June 27, 2017

Mr. Doug Taylor
1485 Mno-Bmadzewen Way
Fulton, MI 49052

Dear Mr. Taylor:

Section 106 Consultation Invitation Request for Participation in the
Environmental Assessment for I-375 Corridor Study
City of Detroit, Wayne County, Michigan

The Michigan Department of Transportation (MDOT) is partnering with the Federal Highway Administration (FHWA) and the City of Detroit to prepare an Environmental Assessment (EA) for the I-375 Corridor in Detroit, MI.

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The analysis of the alternatives in the EA will lead to the identification of a Preferred Alternative. Funding for construction has been identified for 2022 in MDOT's Five -Year Transportation Program. The project is now on track for environmental clearance, subject to the National Environmental Policy Act.

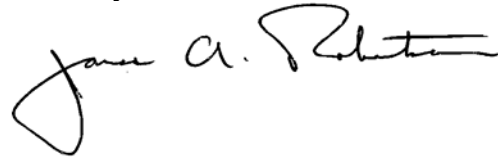
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On behalf of the Federal Highway Administration, MDOT respectfully invites the Nottawaseppi Huron Band of the Potawatomi to participate in formal Section 106 consultation regarding

traditional cultural and/or religious places and/or other significant sites that you are concerned may be affected by this proposed project.

I would be happy to discuss this project with you in more detail over the phone, or in person. Please do not hesitate to contact me at 517-335-2637, robertsonj3@michigan.gov and/or by mail at 425 West Ottawa Street, Lansing, Michigan 48909.

Sincerely,

A handwritten signature in black ink, appearing to read "James A. Robertson". The signature is fluid and cursive, with a large initial "J" and "R".

James A. Robertson, Ph.D.
Staff Archaeologist
Environmental Services Section

Attachments

cc: Arnita Furgason (FHWA)
Claire Stevens (MDOT)
Geraldyn Ayers (MDOT)



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

June 27, 2017

Mr. Jason Wesaw
PO Box 180
Dowagiac, MI 49047

Dear Mr. Weesaw:

Section 106 Consultation Invitation Request for Participation in the
Environmental Assessment for I-375 Corridor Study
City of Detroit, Wayne County, Michigan

The Michigan Department of Transportation (MDOT) is partnering with the Federal Highway Administration (FHWA) and the City of Detroit to prepare an Environmental Assessment (EA) for the I-375 Corridor in Detroit, MI.

A Planning and Environmental Linkage (PEL) study to develop Illustrative Alternatives was conducted in 2014 and is the starting point for this EA. The Illustrative Alternatives support the following key goals to:

- Enhance the transportation network and preserve safety.
- Support or enhance community quality of life.
- Enhance economic opportunities.
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Additionally, the PEL study sought ways to improve the connectivity for the Central Business District, riverfront, entertainment district, Eastern Market, Jefferson/Gratiot Avenues and the surrounding neighborhoods. Maps of the six alternatives identified by the PEL study will be the subject of the EA and are attached.

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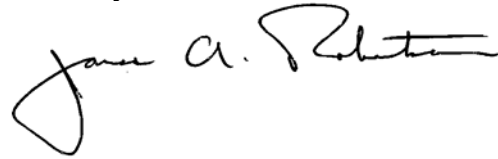
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On behalf of the Federal Highway Administration, MDOT respectfully invites the Pokagon Band of Potawatomi Indians to participate in formal Section 106 consultation regarding traditional

cultural and/or religious places and/or other significant sites that you are concerned may be affected by this proposed project.

I would be happy to discuss this project with you in more detail over the phone, or in person. Please do not hesitate to contact me at 517-335-2637, robertsonj3@michigan.gov and/or by mail at 425 West Ottawa Street, Lansing, Michigan 48909.

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Geraldyn Ayers (MDOT)



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

June 27, 2017

Mr. Willie Johnson
6650 East Broadway Road
Mt. Pleasant, MI 48858

Dear Mr. Johnson:

Section 106 Consultation Invitation Request for Participation in the
Environmental Assessment for I-375 Corridor Study
City of Detroit, Wayne County, Michigan

The Michigan Department of Transportation (MDOT) is partnering with the Federal Highway Administration (FHWA) and the City of Detroit to prepare an Environmental Assessment (EA) for the I-375 Corridor in Detroit, MI.

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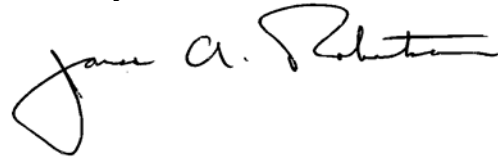
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On behalf of the Federal Highway Administration, MDOT respectfully invites the Saginaw Chippewa Indian Tribe of Michigan to participate in formal Section 106 consultation regarding

traditional cultural and/or religious places and/or other significant sites that you are concerned may be affected by this proposed project.

I would be happy to discuss this project with you in more detail over the phone, or in person. Please do not hesitate to contact me at 517-335-2637, robertsonj3@michigan.gov and/or by mail at 425 West Ottawa Street, Lansing, Michigan 48909.

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RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

June 27, 2017

Ms. Colleen Medicine
523 Ashmun Street
Sault Ste. Marie , MI 49783

Dear Ms. Medicine:

Section 106 Consultation Invitation Request for Participation in the
Environmental Assessment for I-375 Corridor Study
City of Detroit, Wayne County, Michigan

The Michigan Department of Transportation (MDOT) is partnering with the Federal Highway Administration (FHWA) and the City of Detroit to prepare an Environmental Assessment (EA) for the I-375 Corridor in Detroit, MI.

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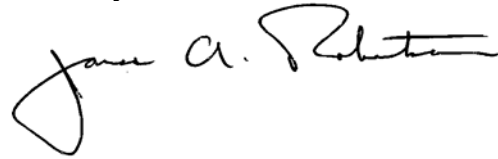
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On behalf of the Federal Highway Administration, MDOT respectfully invites the Sault Ste. Marie Tribe of Chippewa Indians of Michigan to participate in formal Section 106 consultation

regarding traditional cultural and/or religious places and/or other significant sites that you are concerned may be affected by this proposed project.

I would be happy to discuss this project with you in more detail over the phone, or in person. Please do not hesitate to contact me at 517-335-2637, robertsonj3@michigan.gov and/or by mail at 425 West Ottawa Street, Lansing, Michigan 48909.

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Staff Archaeologist
Environmental Services Section

Attachments

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Claire Stevens (MDOT)
Geraldyn Ayers (MDOT)



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Michigan Ecological Services Field Office
2651 Coolidge Road, Suite 101
East Lansing, Michigan 48823-6316

IN REPLY REFER TO:

July 10, 2017

Mr. Kelby Wallace
Michigan Department of Transportation
State Transportation Building
425 Ottawa St.
P.O. Box 30050
Lansing, MI 48909

Re: Request for Early Coordination I-375 Environmental Assessment in Detroit, Wayne County, Michigan.

Dear Mr. Wallace,

We are responding to your request for early coordination regarding the preparation of an Environmental Assessment for the reconstruction of I-375 in downtown Detroit, Wayne County, Michigan. We submit these comments in accordance with section 7 of the Endangered Species Act of 1973, as amended (Act), the Migratory Bird Treaty Act (MBTA), and the National Environmental Policy Act (NEPA).

Endangered Species

Under Section 7 of the Endangered Species Act (Act), Federal Agencies are required to consult with the U.S. Fish & Wildlife Service to ensure their actions are not likely to jeopardize the continued existence of species listed under the Act. Presently, there are no known federally listed species in the proposed action area. As additional project information becomes available, further Section 7 coordination with USFWS may be required under the Act.

Migratory Birds

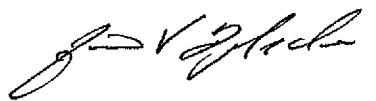
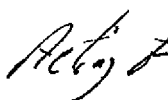
Under the MBTA of 1918, as amended, it is unlawful to take, capture, kill, or possess migratory birds, their nests, eggs, and young. For proposed projects that may contain habitat suitable for nesting by migratory bird species, we recommend you schedule construction activities or remove potential habitat or nesting structures before birds initiate spring nesting or after the breeding season has ended to avoid take of migratory birds, eggs, young, and/or active nests. Generally, we recommend that any habitat disturbance occur before April 15 or after August 15 to minimize potential impacts to migratory birds, but please be aware that some species may start nesting before April 15.

Wetlands

Pursuant to the federal Clean Water Act, the State of Michigan regulates certain activities in wetlands. Development that would impact wetlands may require a permit for which this office may have review authority. In the review of these permit applications, we may concur (with or without stipulations) or object to permit issuance depending whether the proposed work may impact public trust fish and wildlife resources. We encourage you to avoid and minimize impacts to wetlands to the maximum extent feasible, including the use of wildlife friendly erosion/sediment control measures.

We appreciate the opportunity to provide comments at this early stage of project planning. If you have any questions regarding these comments, please contact Matt Ihnken of this office at 517-351-8747 or matthew_ihnken@fws.gov.

Sincerely,



Scott Hicks
Field Supervisor

cc: Patrick Marchman, FHWA, Lansing



DEPARTMENT OF THE ARMY
DETROIT DISTRICT, CORPS OF ENGINEERS
477 MICHIGAN AVE.
DETROIT, MICHIGAN 48226-2550

July 10, 2017

Kelby Wallace, P.E.
Michigan Department of Transportation
State Transportation Building
425 W. Ottawa St.
P.O. Box 30050
Lansing, MI 48909

Dear Mr. Wallace:

This is in response to your June 5, 2017, letter requesting input to the proposed I-375 Improvement Project in Detroit, Wayne County, Michigan. While we have no specific areas of concern, nor technical information, pertaining to the proposed I-375 study alternatives, we are providing comments in accordance with our responsibilities under our civil works and regulatory programs. We are also providing advice under our Floodplain Management Services Program.

Our civil works program does not include any current plans that would be affected by any of the proposed I-375 improvement alternatives; nor do we have any current or proposed studies for the area described in your letter.

Review of the applicable Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map indicates that the project area is not in a Federally mapped floodplain (Enclosure). As the FEMA floodplain mapping is for flood insurance purposes, it does not necessarily identify all areas subject to flooding, particularly from local drainages of small size. Therefore, we recommend that the project be coordinated with local officials and with the MDEQ, Water Resources Division (517-284-5567), regarding the applicability of a floodplain permit prior to construction. This coordination would help ensure compliance with local and state floodplain management regulations and acts. If you obtain information indicating that any part of your project would impact a floodplain, you should consider other alternatives that, to the extent possible, avoid or minimize adverse impacts associated with use of the floodplain.

Regarding Department of the Army regulatory jurisdiction, our Regulatory Office notes that in 1984 a portion of the Corps' regulatory responsibilities was assumed by the State of Michigan. The I-375 Improvement Project is within the assumed area. Unless otherwise notified, a separate authorization from the Corps is not required; however, permits may be required by the Michigan Department of Environmental Quality.

We appreciate the opportunity to comment on the I-375 Improvement Study, Detroit, Michigan. Any further correspondence or review requests for this study should be directed to "Charles A. Uhlarik (CELRE-PLE)" at the address in our letterhead. Any other questions may be directed to Mr. Paul Allerding of my staff at 313-226-7590 or me at 313-226-2476.

Sincerely,

Original signed

Charles A. Uhlarik, Chief
Environmental Analysis Branch

Enclosure

Copies furnished:

Laura Garrett, Corps' Regulatory Office, Detroit

Jason Chrumka, Corps' Floodplain Management Services Coordinator, Detroit



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

JUL 12 2017

REPLY TO THE ATTENTION OF:

Kelby Wallace
Michigan Department of Transportation
425 West Ottawa
P.O. Box 30050
Lansing, Michigan 48909

Re: Scoping for Interstate 375 (I-375) from Interstate 75 (I-75) to Atwater Street, and Jefferson Avenue from Woodward Avenue to Rivard Street, Detroit, Michigan.

Dear Mr. Wallace:

The U.S. Environmental Protection Agency has received the scoping request dated June 5, 2017 for the above-referenced project. Our comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The Michigan Department of Transportation (MDOT) is partnering with the Federal Highway Administration (FHWA) and the City of Detroit to prepare a Draft Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) for the I-375 project in Detroit, Michigan. The study limits are I-75 to Atwater Street (from north to south) and Jefferson Avenue from Woodward Avenue to Rivard Street (from east to west); the study area also includes the I-375/I-75 interchange, the Gratiot Connector, and part of Gratiot Avenue.

A Planning and Environmental Linkages (PEL) study was previously prepared to identify the purpose and need and develop a suite of alternatives. The Draft EA will evaluate whether alternatives address the purpose and need, which include enhancing the transportation network and preserving safety, supporting or enhancing community quality of life, enhancing economic opportunities, and preserving environmental resources.

Based on our review of the provided information, we recommend the following be included in the forthcoming Draft EA.

Green Infrastructure and Materials Management

EPA notes that several alternatives transition I-375 into a surface street south of Lafayette Avenue, which would reasonably require a large amount of fill in order to bring the road to grade. EPA is also aware that fill material is currently in high-demand in the Detroit area, sometimes requiring fill materials to be shipped into the area. The provided suite of alternatives all include increased green space in the right-of-way (ROW), increasing infiltration capacity. Because of this, clean fill, that will not lead to contaminated infiltration, should be arranged.

Recommendation: In the Draft EA, we recommend identifying from where the fill might come and for what contaminants it will be tested. Any resultant cleaning processes should also be described. We recognize this information may not be known until later in the design process; however, we recommend providing as much detail as available at this time.

Based on the provided information, we expect a reasonable amount of materials removal from the project site, as roads, access, and other features are reconfigured. Reuse of materials may provide both an environmental benefit as well as an economic (by lowering project cost) benefit. Also see EPA's website on sustainable materials management¹.

Recommendation: If feasible, we recommend MDOT/FHWA include a sustainable materials management plan, which includes potential reuse (either within the project area or elsewhere) of materials removed from the project area.

Green infrastructure includes elements of the natural environment (green space, aquatic features, natural corridors, tree canopy, etc.), as well as elements of the constructed environment (green roofs, bioswales, permeable pavements, vegetated medians, rain and community gardens, etc.), which contribute to environmental quality, healthy communities, reduced long-term maintenance costs, and economic value. We note the inclusion of increased green space along the portion of I-375 that is proposed for lifting to street-grade. All alternatives appear to provide site redevelopment, which lends itself to green infrastructure opportunities, including, but not limited to, green roofs, permeable sidewalks and parking lots, and vegetated spaces.

Recommendations: We recommend considering both low-growing, native prairie plantings and trees in the proposed green median and other available MDOT rights-of-way. As portions of I-375 become signalized, arterial streets, we also recommend bump-outs with vegetation, which serve a second purpose of traffic calming. The Draft EA should identify whether (and where) permeable pavement can be used in sidewalks, pedestrian crossings, and auxiliary facilities.

We also recommend MDOT/FHWA continue to work with the City of Detroit, businesses, and local communities to comprehensively plan for green infrastructure adjacent to the project area, particularly where an alternative yields new space for redevelopment.

Community Impacts

EPA commends MDOT/FHWA for already including active transportation (pedestrian and bicycle) as part of the project's goals.

Recommendation: We recommend continued coordination with the City of Detroit and local communities concerning appropriate pedestrian and bicycle routes around the

¹ <https://www.epa.gov/smm/sustainable-management-construction-and-demolition-materials>

project area, including crossings and access to public and community resources. Any resultant mitigation should be included in the Draft EA and FONSI.

EPA's environmental justice (EJ) screening tool, EJSCREEN, indicates there may be communities living with EJ concerns in the project area; this includes low-income and/or minority populations in addition to vulnerable populations (see bullet below regarding children's health).

Recommendation: The Draft EA should describe MDOT/FHWA's EJ methodology, including meaningful public engagement in the project area. We recommend considering the guiding principles and steps in the EJ Interagency Working Group's *Promising Practices for EJ Methodologies in NEPA Reviews*².

EJSCREEN indicates a high number of children under age of five live in parts of the project area; additionally, we note the proximity of the Children's Hospital of Michigan (Hospital) to the project area. Children may be more highly exposed to contaminants because they generally eat more food, drink more water, and have higher inhalation rates relative to their size. Children may be more vulnerable to the toxic effects of contaminants because their bodies and systems are not fully developed and their growing organs are more easily harmed. Further, children in a hospital may be disproportionately impacted by construction activities and corridor operations.

Recommendations: We recommend including an analysis of impacts to children by the proposed action. The Draft EA should characterize and address children's exposures and susceptibilities to the pollutants of concern, which could include, but are not limited to, the following:

- **Identification of the pollutants and sources of concern:** There are various sources of information to identify pollutants of potential concern and the resultant nature of the specific concerns (such as neurotoxicity, respiratory effects, carcinogenicity, etc.). One such source is EPA's *America's Children and the Environment Report*³, 3rd Edition, which provides useful information about such pollutants, including criteria air pollutants and hazardous air pollutants, contaminants in indoor environments, and others.
- **Exposure Assessment:** Describe demographic characteristics of affected neighborhoods/populations/communities and focus exposure assessments on schools, recreation areas, childcare centers, parks, and residential areas in close proximity (within ½ mile) to the proposed project, and other areas of apparent frequent and/or prolonged exposure.
- **Baseline health conditions:** Consider analyzing available relevant health data for the impacted communities. In some localities, community or census tract data may be available for indicators such as lead screening rates, number of children with elevated blood lead levels, age of housing, asthma emergency room visits and hospitalizations rates, etc. Consultation with public health officials is an appropriate way to identify and access relevant data.

² <https://www.epa.gov/environmentaljustice/ej-iwg-promising-practices-ej-methodologies-nepa-reviews>

³ <http://www.epa.gov/envirohealth/children/>

- **Respiratory Impacts/Asthma:** To the extent possible, consider data on existing asthma rates and asthma severity among children and the general community living, working, playing, and attending school and childcare facilities near the project site.
- **Noise and Vibration:** Consider impacts from noise on health and learning, especially near the Hospital, homes, schools, and childcare centers. Mitigation may include limiting noise and vibration-inducing activities to times when fewer children are present (such as outside of school hours).
- **Air Pollutant Emissions:** Consider exposure and impacts to children from mobile source air pollutants, including proximity to transportation corridors, transportation hubs, ports, and project construction emissions. Combine these with other area sources/baseline air quality. Mitigation may include outreach to impacted communities concerning how to reduce exposure (such as staying indoors or keeping windows closed). This may include redirecting the Hospital's air intake system or requiring additional filter changes during construction.
- **Other Chemical or Physical Exposures:** Consider impacts to children from other site activities, such as pesticide application, demolition, construction traffic, etc.

Air Quality, Noise, and Vibration

Construction activities and new traffic patterns will result in both temporary and permanent impacts to air quality. In addition to analyzing how air quality will permanently change as a result of the project, the Draft EA should include temporary impacts from construction. Any resultant mitigation should be committed to in the FONSI.

Recommendation: See the enclosed document for recommendations to reduce construction-related emissions.

Based on a desktop review, EPA notes both hospital and university facilities near the project area. An often overlooked point of concern for universities is the impact of vibration from both construction and operation on sensitive research or procedure equipment.

Recommendation: EPA recommends MDOT/FHWA continue coordination with hospital and university facilities regarding potential impacts from vibration from both construction and operational changes. Any resultant mitigation should be included in the Draft EA and FONSI.

Roadside Vegetation

Public health concerns related to near-road air quality are an important environmental issue, given the increasing number of studies linking adverse health effects to populations spending significant amounts of time near high-traffic roads⁴. Research indicates that roadways generally influence air quality about 500-600 feet downwind, particularly roads with significant truck traffic. Properly designed vegetation barriers can be used to reduce near-road air pollution, either alone or in combination with solid noise barriers. In addition to air quality benefits, roadside vegetation can also improve aesthetics, increase property values, reduce heat, control surface

⁴ Health Effects Institute, 2010. Traffic-related air pollution: a critical review of the literature on emissions, exposure, and health effects. HEI Special Report 17. Health Effects Institute, Boston, MA

water runoff, and reduce noise pollution. Design considerations are not dissimilar to standard roadside vegetation planning, but have a heightened focus on improving air quality.

Recommendations: EPA recommends MDOT/FHWA identify locations for properly designed native, roadside vegetation along the project area, where practical, given the dense urban setting of the project. We recommend considering whether locations where sensitive receptors live, work, and play (e.g., schools, childcare centers, hospitals, elder-care facilities, neighborhoods) might especially benefit from a vegetated buffer. Additional considerations can be found in EPA's *Recommendations for Constructing Roadside Vegetation Barriers to Improve Near-Road Air Quality*⁵ and *Near Roadway Air Pollution and Health: Frequently Asked Questions*⁶.

EPA commends MDOT and FHWA's approach to alternative development and consideration of an at-grade street that supports connectivity and access for the community and the City of Detroit. We also commend the project team for identifying a holistic purpose and need that encompasses community needs in addition to transportation needs.

Thank you in advance for your consideration of our comments. Please send us a copy of Draft EA once it becomes available. If you have any questions, please do not hesitate to call me or Elizabeth Poole of my staff at 312-353-2087 or poole.elizabeth@epa.gov.

Sincerely,



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

Enclosure (1): Construction Emissions Reduction Checklist

Cc: Janet Attarian, City of Detroit

⁵ https://cfpub.epa.gov/si/si_public_file_download.cfm?p_download_id=528612

⁶ <https://www.epa.gov/air-research/near-roadway-air-pollution-and-health-frequent-questions>

U.S. Environmental Protection Agency
Construction Emission Control Checklist

Mobile and Stationary Source Diesel Controls

Purchase or solicit bids that require the use of vehicles that are equipped with zero-emission technologies or the most advanced emission control systems available. Commit to the best available emissions control technologies for project equipment in order to meet the following standards.

- On-Highway Vehicles: On-highway vehicles should meet, or exceed, the EPA exhaust emissions standards for model year 2010 and newer heavy-duty, on-highway compression-ignition engines (e.g., long-haul trucks, refuse haulers, shuttle buses, etc.).¹
- Non-road Vehicles and Equipment: Non-road vehicles and equipment should meet, or exceed, the EPA Tier 4 exhaust emissions standards for heavy-duty, non-road compression-ignition engines (e.g., construction equipment, non-road trucks, etc.).²
- Low Emission Equipment Exemptions: The equipment specifications outlined above should be met unless: 1) a piece of specialized equipment is not available for purchase or lease within the United States; or 2) the relevant project contractor has been awarded funds to retrofit existing equipment, or purchase/lease new equipment, but the funds are not yet available

Consider requiring the following best practices through the construction contracting or oversight process:

- Use onsite renewable electricity generation and/or grid-based electricity rather than diesel-powered generators or other equipment.
- Use ultra-low sulfur diesel fuel (15 ppm maximum) in construction vehicles and equipment.
- Use catalytic converters to reduce carbon monoxide, aldehydes, and hydrocarbons in diesel fumes. These devices must be used with low sulfur fuels.
- Use electric starting aids such as block heaters with older vehicles to warm the engine.
- Regularly maintain diesel engines to keep exhaust emissions low. Follow the manufacturer's recommended maintenance schedule and procedures. Smoke color can signal the need for maintenance (e.g., blue/black smoke indicates that an engine requires servicing or tuning).
- Retrofit engines with an exhaust filtration device to capture diesel particulate matter before it enters the construction site.
- Repower older vehicles and/or equipment with diesel- or alternatively-fueled engines certified to meet newer, more stringent emissions standards (e.g., plug-in hybrid-electric vehicles, battery-electric vehicles, fuel cell electric vehicles, advanced technology locomotives, etc.).
- Retire older vehicles, given the significant contribution of vehicle emissions to the poor air quality conditions. Implement programs to encourage the voluntary removal from use and the marketplace of pre-2010 model year on-highway vehicles (e.g., scrappage rebates) and replace them with newer vehicles that meet or exceed the latest EPA exhaust emissions standards.

Fugitive Dust Source Controls

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative, where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.
- Install wind fencing and phase grading operations where appropriate, and operate water trucks for stabilization of surfaces under windy conditions.

¹ <http://www.epa.gov/otaq/standards/heavy-duty/hdci-exhaust.htm>

² <http://www.epa.gov/otaq/standards/nonroad/nonroadci.htm>

- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

Occupational Health

- Reduce exposure through work practices and training, such as turning off engines when vehicles are stopped for more than a few minutes, training diesel-equipment operators to perform routine inspection, and maintaining filtration devices.
- Position the exhaust pipe so that diesel fumes are directed away from the operator and nearby workers, reducing the fume concentration to which personnel are exposed.
- Use enclosed, climate-controlled cabs pressurized and equipped with high-efficiency particulate air (HEPA) filters to reduce the operators' exposure to diesel fumes. Pressurization ensures that air moves from inside to outside. HEPA filters ensure that any incoming air is filtered first.
- Use respirators, which are only an interim measure to control exposure to diesel emissions. In most cases, an N95 respirator is adequate. Workers must be trained and fit-tested before they wear respirators. Depending on the type of work being conducted, and if oil is present, concentrations of particulates present will determine the efficiency and type of mask and respirator. Personnel familiar with the selection, care, and use of respirators must perform the fit testing. Respirators must bear a NIOSH approval number.

NEPA Documentation

- Per Executive Order 13045 on Children's Health³, EPA recommends the lead agency and project proponent pay particular attention to worksite proximity to places where children live, learn, and play, such as homes, schools, and playgrounds. Construction emission reduction measures should be strictly implemented near these locations in order to be protective of children's health.
- Specify how impacts to sensitive receptors, such as children, elderly, and the infirm will be minimized. For example, locate construction equipment and staging zones away from sensitive receptors and fresh air intakes to buildings and air conditioners.

³ Children may be more highly exposed to contaminants because they generally eat more food, drink more water, and have higher inhalation rates relative to their size. Also, children's normal activities, such as putting their hands in their mouths or playing on the ground, can result in higher exposures to contaminants as compared with adults. Children may be more vulnerable to the toxic effects of contaminants because their bodies and systems are not fully developed and their growing organs are more easily harmed. EPA views childhood as a sequence of lifestages, from conception through fetal development, infancy, and adolescence.

Kelby Wallace, P.E.
M-DOT Project Manager

Dear, Mr. Kelby Wallace



2990 W. Grand Blvd., Suite 2
Detroit, MI 48202
313.259.4407
info@detroitfuturecity.com

Detroit Future City is supportive of the reconfiguration of I-375 between I-75 and Jefferson Avenue on the eastern edge of Downtown. This presents the opportunity to reconnect the urban fabric in the area and provided much needed connections between all districts in the area as well as the riverfront. Detroit Future City recommends that any improvements included green stormwater infrastructure, connects to existing and potential future non-motorized facilities, and a robust civic engagement process that considers feedback from a wide range of stakeholders.

Detroit Future City strongly supports the inclusion of green stormwater infrastructure in the right-of-way. This is especially important in the Greater Downtown where there is a larger amount of impervious surface which contributes to the overloading of the city's combined sewer system. There is also limited space for GSI in these areas and the right-of-way provides an excellent opportunity to for GSI to mitigate runoff. The reconfiguration of I-375 also presents the opportunity to create non-motorized connections into the CBD. While there has been a vast improvement in cycling infrastructure over the past several years, here are still limited connections into the CBD. The I-375 projects presents the opportunity to connect multiple districts to each other and beyond. These connections should not only consider existing greenway assets such as the Dequindre Cut and the Riverfront, but also potential future connections.

Detroit Future City also strongly supports a robust civic engagement process that considers feedback from a range of stakeholders. As with all projects public engagement is a key element in creating the necessary buy in from stakeholders. These stakeholders should represent a broad cross section of the community from residents in the surrounding neighborhoods to businesses and civic leaders that are located nearby.

Detroit Future City is supportive of the reconfiguration of I-375. Future communication concerning this project should be directed to Edward Lynch. He can be reached by email at elynch@detroitfuturecity.com or by phone at 313-499-3314.

Sincerely,

A handwritten signature in black ink, appearing to read "Anika Goss-Foster".

Anika Goss-Foster
Executive Director, Detroit Future City



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
MICHIGAN STATE HOUSING DEVELOPMENT AUTHORITY
DETROIT

EARL J. POLESKI
EXECUTIVE DIRECTOR

August 8, 2017

Mr. Jonathan Loree
MDOT Project Manager
Michigan Department of Transportation
425 W. Ottawa St.
Lansing, MI 48933

Dear Mr. Wallace,


I have been asked by the MSHDA Executive Director, Earl Poleski, to respond to your June 5, 2017 letter requesting both information and specific areas of concern re: the preparation of an Environmental Assessment for the I-375 corridor in Detroit. In reviewing the study area of I-75 to the North and Atwater to the South as well as the adjoining study areas, the Michigan State Housing Development Authority (MSHDA) offers these thoughts and comments:

A review of the MSHDA real estate portfolio indicates there are no MSHDA housing developments within the boundaries of the study area. With respect to historic resources, the SHPO coordinated with MDOT during a previous feasibility study of this project and provided a list of historic properties. That list is still suitable pending the start of a formal environmental consultation process and once the various project alternatives are identified, the SHPO will again coordinate with MDOT.

With respect to environmental issues, since there are no MSHDA related projects in the study area we do not have any concerns at this time. The typical noise and dust issues associated with this type of activity, we expect will be handled as part the MDOT Environmental Assessment.

Thank you for the opportunity to provide this feedback. Should you need additional information please feel free to contact me.

Sincerely,



Burney Johnson
Deputy Director

CC: E. Poleski
G. Heidel



RECEIVED

OCT 16 2018

RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

October 15, 2018

Mr. Brian Conway
State Historic Preservation Officer
State Historic Preservation Office
Michigan Historical Center
702 West Kalamazoo Street
Lansing, Michigan 48909-8240

Dear Mr. Conway:

**Environmental Assessment (EA)
I-375 Corridor Study
City of Detroit, Wayne County, Michigan
Determination of National Register Eligibility of 20WN284 and 20WN331
ER99-391**

The purpose of this letter is to request State Historic Preservation Office (SHPO) concurrence with the determination by the Michigan Department of Transportation (MDOT) that archaeological sites 20WN284 and 20WN331 are not eligible for listing on the National Register of Historic Places (NRHP). The *I-375 Improvement Project: Land Use History and Assessment of Archaeological Potential, City of Detroit, Wayne County Michigan* technical report, prepared for MDOT by Commonwealth Heritage Group (CHG) were delivered to your office on July 30, 2018. Dr. Dean Anderson reviewed this report and we received your comments in your letter dated August 28, 2018. Subsequently, Dr. Anderson and I discussed the eligibility of the above-referenced sites on October 10, 2018 and we agreed that both 20WN284 and 20WN331 are not eligible for listing on the NRHP.

Environmental Assessment/Scope of Work

The MDOT is preparing an *Environmental Assessment and Programmatic Section 4(f) Evaluation* (EA) for the proposed improvements to the I-375 Expressway, which includes alternatives that would replace a portion of the I-375 expressway with an at-grade boulevard, make changes to the alignment of E. Jefferson Ave., and improve connections to the riverfront via Schweitzer Place (between E. Jefferson Ave. and Atwater St.). The preferred alternative, a refined version of Practical Alternative 5 based on feedback from public meetings, workshops with the City of Detroit, one-on-one meetings with stakeholders in the study area, and alterations based on potential impacts, will include construction in the area of archaeological sites 20WN284 and 20WN331.

Archaeological Sites 20WN284 and 20WN331

As described in the CHG report cited above, sites 20WN284 (Clinton Park Cemetery Site) and 20WN331 (Russell Street Cemetery site) are two abandoned Euro-American cemeteries. The Clinton Park Cemetery (20WN284) was located on the east and west sides of St. Antoine Street, south of Gratiot Avenue with interments documented for the period 1827 to 1854. According to Krepps on page 4 of her 1984 manuscript titled *Land Use History of the Conner Creek Cemetery (20WN383) Containing As Well, Background Studies of Clinton Park and Russell Street Cemeteries in Detroit, Wayne County, Michigan* (on file, Michigan State Historic Preservation Office, Lansing), the City of Detroit Sexton was tasked with vacating the cemetery between October 1, 1869 and November 12, 1869. The contents of 1,892 graves were removed and reinterred in Mt. Elliott, Elmwood, and other cemeteries. Subsequently, the part of the cemetery area west of St. Antoine Street housed a city park as well as shops and residences; it is currently the site of the Frank Murphy Hall of Justice. The area east of St. Antoine Street housed the Michigan College of Medicine and St. Mary's Hospital and is currently a construction site. Due to these cycles of construction, demolition and reconstruction and the intentional abandonment of the cemetery in 1869, the Clinton Park Cemetery site lacks integrity as an archaeological site and, in the opinion of MDOT, is not eligible for listing on the NRHP.

The CHG report cited above, describes the Russell Street Cemetery (20WN331) as the former location of a nineteenth-century cemetery with interments dating from 1835 to 1869. At the time of purchase, the parcel measured 55 acres. The size of the Russell Street Cemetery shrunk steadily between the period of 1857 and the early 1870s, as portions of the cemetery were abandoned and annexed into the growing city. Present-day Division Street was cut through the grounds on May of 1857, in an area presumed at that time to contain no internments, Cherry and James Streets are shown to cut through the cemetery location as early as 1863, and in 1864 the City Controller was instructed to remove burials located along present-day Adelaide Street; these burials were relocated to the Elmwood Cemetery. Protestant burials removed in 1867–1868 to make way for Marion (now Winder) Street were relocated to the Woodmere Cemetery. By 1870, five city streets had been constructed within the bounds of the original 55-acre cemetery. The loss of this area to city development accounted for a loss of approximately 40 percent of the cemetery's original usable acreage. On April 20, 1869, the City of Detroit instructed the City Sexton to cease all internments to the north of House of Correction (the location of present day Wilkins Street) (Farmer 1889:55; Krepps 1984:13), and on January 25, 1870, the Common Council resolved to vacate the entire cemetery (Krepps 1984:13). It is believed that use of the potter's field ceased at about the same time as the use of the Russell Street Cemetery. The cemetery was then left unattended for nearly a decade, and on May 14, 1879, the Circuit Court issued the order for the Russell Street Cemetery to be vacated (Farmer 1889:55). This order gave the city full control over the cemetery, and the process of reinternment proceeded rapidly over the next three years (1880–1882). Due to the subsequent development, redevelopment and construction in the cemetery, from the construction of the original Detroit House of Corrections (1861) to the Fisher Freeway (I-75), and the intentional abandonment of the cemetery, the Russell Street cemetery lacks integrity as an archaeological site and, in the opinion of MDOT, is not eligible for listing on the NRHP.

Mr. Brian Conway
Page 3
October 15, 2018

Conclusion

If you concur with MDOT's determination of the NRHP-eligibility of 20OT344 and 20OT283, please sign the concurrence line below. Please feel free to contact me at 335-2637, if you have any questions or concerns. Thank you.

Sincerely,



James A. Robertson, Ph.D.
Staff Archaeologist
Environmental Services Section

BOD:ESS:JAR:td

I concur:


Brian Conway, State Historic Preservation Officer

Date:

11/5/18

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OCT 16 2018



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

October 15, 2018

Mr. Brian Conway
State Historic Preservation Officer
State Historic Preservation Office
Michigan Historical Center
702 West Kalamazoo Street
Lansing, Michigan 48909-8240

Dear Mr. Conway:

**Environmental Assessment (EA)
I-375 Corridor Study
City of Detroit, Wayne County, Michigan
Determination of Effects for Historic Above-Ground, Archaeological Resources,
and Traditional Cultural Properties
ER99-391**

The purpose of this letter is to request State Historic Preservation Office (SHPO) concurrence with the determination by the Michigan Department of Transportation (MDOT) that the preferred alternative for the above-referenced project will pose No Adverse Effect to any of the historic above-ground properties identified below. Additionally, we are seeking SHPO approval of an archaeological research and compliance plan, which includes a No Adverse Effect determination for archaeological resources and traditional cultural properties for this undertaking.

Environmental Assessment/Scope of Work

The Michigan Department of Transportation (MDOT) is preparing an *Environmental Assessment and Programmatic Section 4(f) Evaluation* (EA) for the proposed improvements to the I-375 Expressway. The EA includes two alternatives (Practical Alternatives 4 and 5) that would replace a portion of the I-375 expressway with an at-grade boulevard, make changes to the alignment of East Jefferson Avenue, and improve connections to the riverfront via Schweitzer Place (between E. Jefferson Avenue and Atwater Street). The alternatives also propose a two-way three-lane local street, and a two-way shared-use path. A baseline No Build Alternative has also been evaluated.

The preferred alternative, is a refined version of Practical Alternative 5 (Refined Practical Alternative 5), based on feedback from public meetings, workshops with the City of Detroit. The refined design will feature a reduction in the total number of through lanes along the boulevard, refinement of turning configurations, wider sidewalks, reduced median width, bike lane modifications, on-street parking for Holy Family Roman Catholic Church, and other modifications

to local road traffic flow to provide protected and signalized crossings for pedestrians, improve connectivity for all users, and make the corridor more walkable and pedestrian/bicyclist friendly. Overall, the construction footprint of the preferred alternative (Refined Practical Alternative 5) is reduced compared to the original Practical Alternatives 4 and 5.

Historic Above-ground Resources

The Area of Potential Effect (APE) for the proposed project includes four known historic above-ground resources, and one newly identified property (Property #5, Lafayette Clinic), that we believe is eligible for inclusion in the National Register of Historic Places.

- 1) Detroit Racquet Club, 626 East Woodbridge Street
- 2) Christ Church, 960 East Jefferson Avenue
- 3) Sibley House, 976 East Jefferson Avenue
- 4) Holy Family Roman Catholic Church, 641 Walter P. Chrysler Highway
- 5) Lafayette Clinic/Woodward Academy, 951 East Lafayette Street

These properties, and potential impacts are discussed in detail in the Commonwealth Heritage Group (CHG) report titled *I-375 Improvement Project: Above-Ground Survey and Impacts Evaluation, City of Detroit, Wayne County, Michigan* that was presented to your staff on July 30, 2018. At that time, Lloyd Baldwin met with your staff and discussed the impacts of each alternative, including the preferred alternative (Refined Practical Alternative 5). MDOT believes that the project will pose No Adverse Effect to any of identified historic above-ground properties under any of the alternatives, including the preferred alternative (Refined Practical Alternative 5). The proposed build alternatives do open land between Woodbridge Street and East Jefferson Avenue, which potentially could introduce new construction within the viewshed of the Detroit Racquet Club. Such redevelopment would potentially reintroduce building density that was present prior to construction of the expressway in the early 1960s. Prior to expressway related changes on West Jefferson, the Racquet Club's viewshed was dominated by the rear elevation of the four-story University of Detroit Dinan Hall (built 1915, demolished in 1962 to make way for I-375 ramps). Dinan Hall housed, at different times, the College of Engineering, Law, and Dentistry. Development within this space would be solely under the jurisdiction and discretion of the City of Detroit. The realignment of East Jefferson Avenue back to pre-expressway alignment will have modest benefit to the frontage of Christ Church. The revised Alternative 5 retains on-street parking opportunities for Holy Family Roman Catholic Church. The church uses on-street parking infrequently – primarily on high holy day evening services, weddings, and funerals.

Archaeological Sites, Traditional Cultural Properties, and Tribal Consultation

The APE for archaeological sites and traditional cultural properties is the construction footprint of the preferred alternative, Refined Practical Alternative 5. The *I-375 Improvement Project: Land Use History and Assessment of Archaeological Potential, City of Detroit, Wayne County Michigan* technical report, prepared for MDOT by CHG was delivered to your office on July 30, 2018. Dr. Dean Anderson reviewed this report and we received your comments in your letter

October 15, 2018

dated August 28, 2018. In your letter you concurred that the only sites/areas of concern were two abandoned cemetery sites, 20WN284 and 20WN331, and the area between Jefferson Avenue and Atwater Street, including Schweizer Place and areas adjacent to Schweizer Place where MDOT proposes to acquire right of way to reconstruct this road. Within the latter area we agreed that site 20WN431, an 18th century farmstead, and/or a Native American site of unknown age, might be preserved below the surface. Note that neither CHG in their report, nor MDOT in our consultation with the 12 federally recognized Indian Tribes in Michigan (consultation letters dated June 27, 2017) have identified any traditional cultural properties with the APE.

Subsequently, Dr. Anderson and Dr. James Robertson discussed the eligibility of the sites 20WN284 and 20WN331 on October 10, 2018 and we agreed that both 20WN284 and 20WN331 are not eligible for listing on the NRHP. MDOT has requested your formal comment regarding this determination of eligibility in a letter under separate cover.

While the preferred alternative (Refined Practical Alternative 5) has been selected, design of the proposed realignment and widening of Schweizer Place and relocation of utilities, at this time, is not sufficiently detailed to develop a survey strategy for determining the presence of significant archaeological sites. To that end, at our meeting of October 10, 2018, Dr. Anderson and Dr. Robertson agreed that the most prudent way forward would be, once design is sufficiently complete, then a survey would be completed. In addition, any National Register-eligible archaeological sites revealed by the survey would be mitigated through data recovery, since any such sites would be important for the information they may yield about local and regional history and prehistory, but not for preservation in place. If any eligible archaeological sites are discovered, MDOT shall consult with the SHPO staff to develop and execute an acceptable data recovery plan to mitigate adverse effects. Also note, that construction is not scheduled until 2022, which will facilitate the completion of the above archaeological investigations.

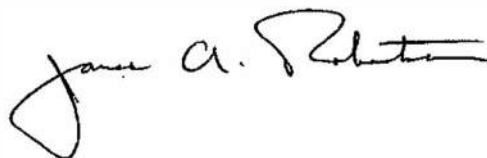
Conclusion

If you concur with this assessment, please sign the concurrence line below. This letter will be included as an attachment to the Environmental Assessment following receipt of the executed concurrence from your office. Please feel free to contact Lloyd Baldwin at 241-2702 regarding above-ground resources and James Robertson at 335-2637 regarding archaeological sites and traditional cultural properties, if you have any questions or concerns. Thank you.

Sincerely,



Lloyd E. Baldwin
Historian
Environmental Services Section



James A. Robertson, Ph.D.
Staff Archaeologist
Environmental Services Section

Mr. Brian Conway

Page 4

October 15, 2018

BOD:ESS:JAR:td

I concur:


Brian Conway, State Historic Preservation Officer

Date: 11/9/18

Grabarkiewicz, Jeffrey (MDOT)

From: Pruden, Jessica A <jessica_pruden@fws.gov>
Sent: Monday, March 23, 2020 11:01 AM
To: Grabarkiewicz, Jeffrey (MDOT); Harris, Cleyo (DNR)
Subject: Re: [EXTERNAL] I-375 Project, Detroit River JN 130035

Jeff,
given the survey data that is available and the proposed location of the new outfall along existing hardened shoreline that is highly impacted, we do not expect federally listed mussels to be present. Therefore, we do not feel that it is necessary to recommend a mussel survey.

Thank you,
Jess

Jessica Pruden
Fish and Wildlife Biologist
U.S. Fish and Wildlife Service
Michigan Ecological Services Field Office
2651 Coolidge Road, Suite 101
East Lansing, MI 48823

517-351-8245
jessica_pruden@fws.gov

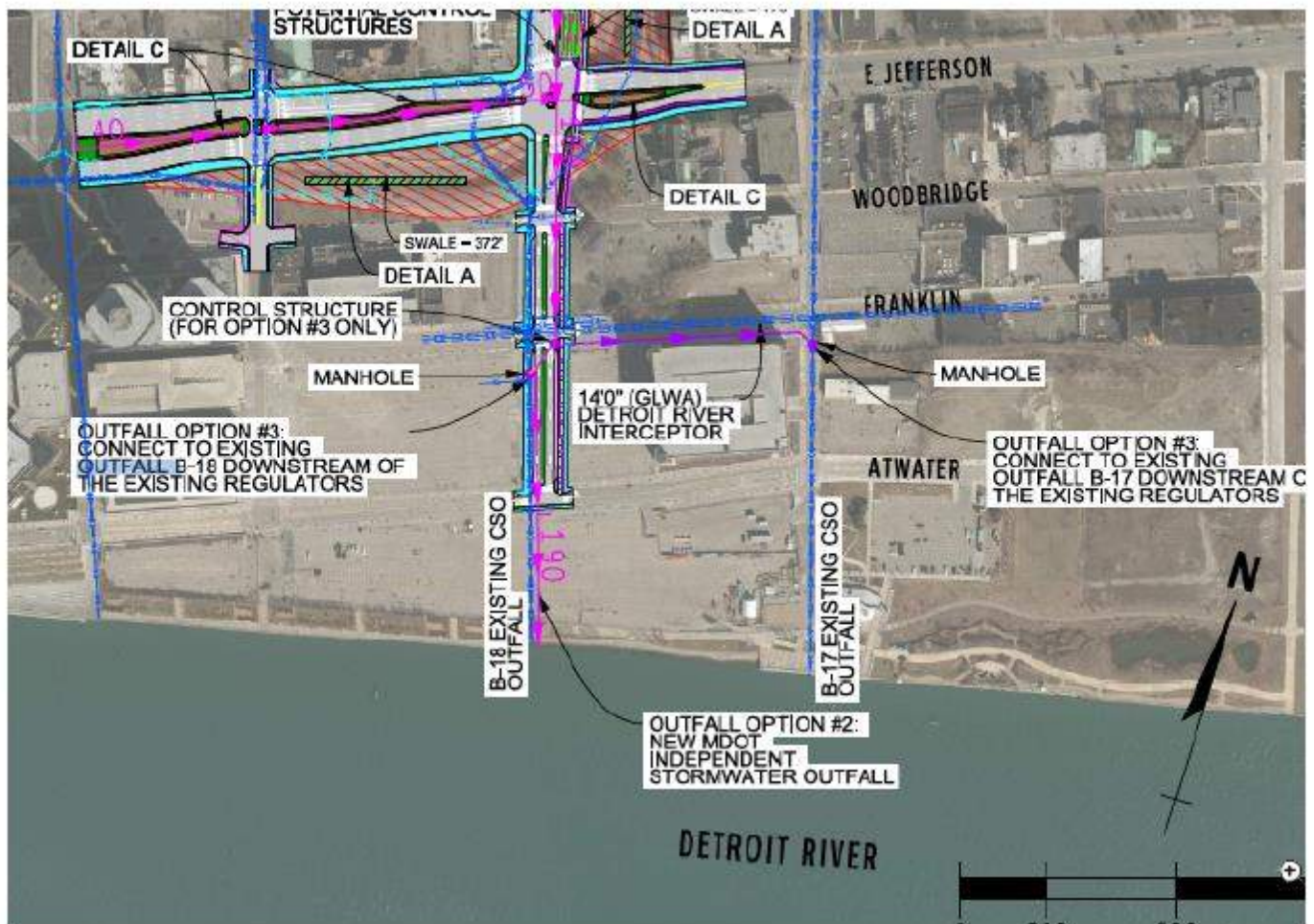
From: Grabarkiewicz, Jeffrey (MDOT) <GrabarkiewiczJ@michigan.gov>
Sent: Thursday, March 19, 2020 12:35 PM
To: Harris, Cleyo (DNR) <HarrisC9@michigan.gov>; Pruden, Jessica A <jessica_pruden@fws.gov>
Subject: [EXTERNAL] I-375 Project, Detroit River JN 130035

Hello Jess and Cleyo,

We have an I-375 Detroit EA that involves a lot of roadwork and redesign of some downtown areas. As part of this project, a new outfall is expected on the RDB of the Detroit River. This was not expected originally with the project, but has now been added and we would like to know if a mussel survey is required? The map below shows some options we are looking at...the location will likely be somewhere around 42.329370, -83.034016. This is not too far downstream of Belle Isle. I looked through Dave Zanatta's research and didn't see any live unionids noted near this part of the river and from other papers don't think there is too much concern. Please let me know at your convenience what you think is warranted.

If you need any additional information, please let me know.

Thanks
Jeff



Thanks,
Jeff

Jeff Grabarkiewicz

Wildlife Ecologist
Michigan Dept of Transportation
Environmental Services Section
517-335-2633 (desk)
517-896-7650 (cell)
GrabarkiewiczJ@michigan.gov



Pokégnek Bodéwadmik • Pokagon Band of Potawatomi
Department of Language and Culture

59291 Indian Lake Road • Dowagiac, MI 49047 • www.PokagonBand-nsn.gov
(269) 462-4316 • (269) 783-2522 fax

1/25/2019

James A. Robertson
Staff Archaeologist
Environmental Services Section
Robertsonj3@michigan.gov

Environmental Assessment for I-375 Corridor Study – City of Detroit, Wayne County, Michigan

Mr. Robertson,

Migwetth for contacting me regarding this project. As THPO, I am responsible for handling Section 106 Consultations on behalf of the tribe. I am writing to inform you that I have reviewed the details for the project referenced above through the provided documentation, as well as, reviewed locational information in relation to known archaeological sites that are significant to the Pokagon Band. To our current knowledge, I have made the determination that this undertaking will have **No Historic Properties in Area of Potential Effects (APE)** significant to the Pokagon Band of Potawatomi Indians.

If any cultural or archaeological resources are uncovered during construction, please stop work and contact me immediately. Should you have any other questions, please don't hesitate to contact me at your earliest convenience.

Sincerely,

Matthew J. N. Bussler
Tribal Historic Preservation Officer
Pokagon Band of Potawatomi Indians
Office: (269) 462-4316
Cell: (269) 519-0838
Matthew.Bussler@Pokagonband-nsn.gov



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
MICHIGAN STATE HOUSING DEVELOPMENT AUTHORITY
STATE HISTORIC PRESERVATION OFFICE

EARL J. POLESKI
EXECUTIVE DIRECTOR

July 27, 2020

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

RE: ER99-391 I-375 Improvement Project, Practical Alternative 5b Archaeology and Above-Ground
Addendum Reports, City of Detroit, Wayne County (FHWA)

Dear Mr. Baldwin:

We have reviewed the Practical Alternative 5b addendum reports.

Regarding the report entitled *I-375 Improvement Project, Above-Ground Survey and Impacts Evaluation, City of Detroit, Wayne County, Michigan* prepared by Commonwealth Heritage Group (Commonwealth), we concur with the recommendations of eligibility presented for the nine resources that were not included in the previous survey and previously identified or designated. We offer these additional requests and comments:

1. Please submit one complete ADA compliant PDF as well as GIS shapefile of the survey area.
2. When conducting a survey that includes properties previously surveyed or listed historic districts, please include recommendations of contributing and non-contributing for each resource.
3. Always include the acreage of the survey area in the abstract.
4. For future surveys that are conducted in a series, please consult with our Survey Coordinator, Katie Kolokithas, to determine the best way to organize and present these reports. Also, keep in mind that these reports must stand alone as well as build off each other.

Additionally, we have reviewed the report entitled *Land Use History and Assessment of Archaeological Potential, City of Detroit, Wayne County*; also prepared by Commonwealth. We concur that, as the final Alternative considerably overlaps the original Alternative studied, there are no new archaeological concerns with this Alternative. Therefore, our recommendations remain unchanged from the original report submitted.

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

Sincerely,

Martha MacFarlane Faes
Deputy State Historic Preservation Officer

MMF:SAT:KAK:bgg

James Robertson, MDOT
Brandon Gabler, Commonwealth Heritage Group

FR 99-391



STATE OF MICHIGAN

GRETCHEN WHITMER
GOVERNOR

DEPARTMENT OF TRANSPORTATION
LANSING

PAUL C. AJEGBA
DIRECTOR

RECEIVED
AUG 13 2020

August 13, 2020

Mr. Brian Grennell, Environmental Review Coordinator
State Historic Preservation Office
Michigan Economic Development Corp
300 N. Washington Square
Lansing, Michigan 48913

Dear Mr. Grennell:

Subject: ER-99-391 Environmental Assessment (EA), I-375 Corridor Study, City of Detroit, Wayne County, Michigan, Determination of Effects

In 2018 MDOT consulted with your office regarding a proposed action to remove a portion of the I-375 expressway and replace it with an at-grade boulevard. Your office concurred with MDOT's no adverse effect determination for the above-referenced project on November 9, 2018 (MDOT letter dated October 15, 2018). That concurrence related to five properties:

- 1) Detroit Racquet Club, 626 E. Woodbridge St.
- 2) Christ Church, 960 E. Jefferson Ave.
- 3) Sibley House, 976 E. Jefferson Ave.
- 4) Holy Family Roman Catholic Church, 641 Walter P. Chrysler Hwy.
- 5) Lafayette Clinic / Woodward Academy, 951 E. Lafayette St

Since that time, Preferred Alternative 5 was further refined, creating Practical Alternative 5A and Practical Alternative 5B. Practical Alternative 5A would bring I-375 to grade south of Gratiot Avenue. Practical Alternative 5B eliminates the I-375 Expressway at the I-75 Interchange. Both alternatives would remove the Gratiot Connector. Both of the alternatives were analyzed for direct and indirect left turns.

Alternative 5B:

Practical Alternative 5B (with direct left turns) has been selected as the Recommended Preferred Alternative. The Alternative meets the Project Purpose and Need and is in sync with local planning goals and objectives and stakeholder expectations.

Under Alternative 5B the new boulevard replaces the I-375 Expressway north of Gratiot Avenue. Montcalm Avenue will be realigned to continue east across Ford Field parking lot B and under

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www.michigan.gov/mdot • 517-373-2090

Brian Grennell
Page 2
August 13, 2020

the new boulevard to provide access to Eastern Market and Gratiot Avenue. The I-375 Gratiot Avenue Connector will be removed but the former service drives will be rebuilt as local connectors. The north-south Russell Street access to Eastern Market will be enhanced with new Rivard Street and Market Street extensions. Gratiot Avenue and the new boulevard will have an at-grade intersection. Impacts from the Gratiot Connector reconfiguration will be within the former I-375 right-of-way.

The proposed new boulevard roadway will be to the west of the existing expressway. The west side sidewalk will be 20 feet wide. The east side sidewalk will be 10 feet wide but will feature a two-direction cycle track to provide a protected route for bicycle traffic. A two-way cycle track is also proposed for Montcalm Avenue, running from Brush Street to Gratiot Avenue. The cycle track would then run along the north side of Gratiot Avenue from Montcalm Street to Orleans Street, then cut over to the south side of Gratiot, terminating at the Dequindre Cut Greenway.

The project will create developable land located on the east side of the new boulevard, between E. Jefferson Avenue and Woodbridge Street, and between the new local Gratiot Collector streets. South of the realigned E. Jefferson Avenue roadway, Schweizer Place will be reconnected to the realigned E. Jefferson Avenue, providing an additional connection to the riverfront between E. Jefferson Avenue and Atwater Street.

See the attached *Determination of Effects Supporting Materials* document for maps showing the project location, cross-section, boulevard plan view, boulevard-West Jefferson Avenue intersection, non-motorized facilities, and right-of-way needs.

Right-of-Way:

A total of 3.25 acres of permanent (fee simple) right-of-way and 0.87 acres of temporary easement will be required for the project but none of the needed land impacts historic above-ground resources. There will be right-of way purchased from a section of the triangular greenspace located between East Jefferson Avenue, Woodbridge Avenue, and the small Christ Church parking lot (south of the E. Jefferson Avenue crossovers). Although owned by Christ Church the parcel is not associated with the historic church property. There will be temporary right-of-way impacts along the service drive on the north side of the Gratiot Connector, at the Eastern Market Historic District, between Market and Riopelle streets and at the NE quad of Russell Street (a parking lot). Other areas where permanent right-of-way will be acquired will not impact historic above-ground resources. There will be acquisition of permanent right-of-way to support improvements on Schweizer Place; the one remaining building, the former Schweizer Restaurant, was removed in 2014 by General Motors to accommodate increased parking. (See Archaeology section, below). A map showing temporary and permanent right-of-way needs can be found on page 5 of the enclosed *Determination of Effects Supporting Materials*.

Brian Grennell
Page 3
August 13, 2020

Because of an expanded Area of Potential Effect (APE), Commonwealth Heritage Group was instructed by MDOT's owner's representative, HNTB, to produce addendum reports for above- and below ground resources. MDOT submitted the addendum reports for above ground and archaeological resources electronically on April 30, 2020 and in hardcopy form on June 2, 2020. Your office accepted the reports in a letter dated July 28, 2020. APE maps for above ground and archaeological resources are enclosed for your reference.

Above Ground Resources:

The 2018 and 2020 cultural resource surveys include 44 NRHP listed or eligible above-ground resources within the APE. Of these, five were identified and discussed in the 2018 consultation and 33 are located within the Eastern Market Historic District and Boundary Expansion. One building, the Brush Street Stadium Deli (2458 Brush Street) is within the locally designated Brush Street Historic District but was determined as not eligible for listing in the NRHP.

Repeating the five properties identified in 2018:

- 1) Detroit Racquet Club, 626 E. Woodbridge St. (NRHP listed)
- 2) Christ Church, 960 E. Jefferson Ave. (NRHP listed)
- 3) Sibley House, 976 E. Jefferson Ave. (NRHP listed)
- 4) Holy Family Roman Catholic Church, 641 Walter P. Chrysler Hwy. (NRHP eligible)
- 5) Lafayette Clinic / Woodward Academy, 951 E. Lafayette St (NRHP eligible)

Properties identified in the 2020 Addendum:

- 1) Trinity Evangelical Lutheran Church Complex (NRHP listed)
- 2) St. Joseph Convent (St. Joseph R.C. Parish Complex (NRHP listed)
- 3) St. John's Episcopal Church (NRHP listed)
- 4) Eastern Market Historic District and expansion (NRHP listed)
- 5) Detroit Thermal Beacon Heating Plant (recommended NRHP eligible)
- 6) Frank Murphy Hall of Justice (recommended NRHP eligible)
- 7) Brewster-Wheeler Recreation Center (recommended NRHP eligible/local Historic District.

Archaeology:

The construction footprint for the preferred alternative serves as the APE for archaeological resources. The *I-375 Improvement Project: Land Use History and Assessment of Archaeological Potential, City of Detroit, Wayne County Michigan* technical report, prepared for MDOT by CHG was delivered to your office on July 30, 2018. Dr. Dean Anderson reviewed this report and we received your comments in your letter dated August 28, 2018. Consultation in 2018 determined three sites that were of concern, two abandoned cemetery sites (20WN284 and 20WN331) and the area between Jefferson Avenue and Atwater Street, including Schweizer Place and areas adjacent

Brian Grennell
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to Schweizer Place where MDOT proposes to acquire right of way to reconstruct this road (Site 20WN431). Your office and MDOT concurred in 2018 that the cemetery sites are not NRHP eligible. In 2020 CHG produced an *Addendum Land Use History and Archaeological Potential* report for the I-375 Environmental Assessment. Recent consultation between MDOT and your office reiterated that there is a possibility of finding undisturbed deposits associated with an 18th century farmstead, and/or a Native American site of unknown age (Site 20WN431). It has been agreed that a survey will be conducted once adequate roadway design and utility relocation information is available. In addition, any National Register-eligible archaeological sites revealed by the survey would be mitigated through data recovery, since any such sites would be important for the information they may yield about local and regional history and prehistory, but not for preservation in place. If any eligible archaeological sites are discovered, MDOT shall consult with the SHPO staff to develop and execute an acceptable data recovery plan to mitigate adverse effects.

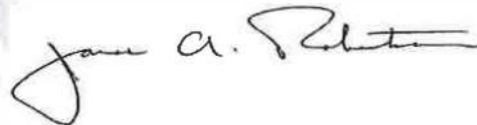
No Adverse Effect:

MDOT has determined that the I-375 Improvement Project will pose **no adverse effect** to above-ground resources listed in or eligible for listing in the National Register of Historic Places. Impacts identified in the 2018 submission remain valid/unchanged. Work within the expanded APE, covering the removal of the Gratiot Connector and associated work on Gratiot Avenue and from Brush Street west to Woodward and west of Ford Field will generally remain within the existing curbs. The project will include sidewalk and ADA sidewalk ramp replacement in several areas but will not physically encroach on any historic properties nor pose adverse visual impacts.

Sincerely,



Lloyd E. Baldwin
Historian
Environmental Services Section



James A. Robertson, Ph.D.
Staff Archaeologist
Environmental Services Section

I concur:



Date:

9/16/20

Martha MacFarlane-Faes, Deputy State Historic Preservation Officer

Enclosures.

Cc: Carly Mitchell, HNTB.



November 13, 2020

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Alexis Wiley

Ms. Sheila Upton
Environmental Services Section
Bureau of Development
Michigan Department of Transportation
425 W. Ottawa Street
P.O. BOX 30050
Lansing, Michigan 48909

Dear Ms. Upton:

The Detroit Riverfront Conservancy (DRFC) supports the efforts of MDOT I-375 Improvement Project, including the updates to the I-75/I-375 Interchange and replacement of the I-375 freeway with a boulevard.

The DRFC has spoken with yourself regarding the proposed construction of the Gratiot Avenue Bridge in Wayne County, Detroit. The proposed work will involve the minor temporary impact of the Dequindre Cut Greenway at the Gratiot Avenue Bridge, which has been determined to qualify as Section 4(f) properties. We agree this project will have no permanent impact to the resources and the amount and location of the land to be temporarily used and the temporary trail detour does not impair the use of Section 4(f) properties for their intended purpose.

The DRFC understands and agrees that as a result of this project, that the proposed work will not result in any permanent adverse change to the current activities, features, or attributes which are important to the purposes or functions that qualify Dequindre Cut Greenway for protection under Section 4(f), and that it will include only temporary impacts. We have also reviewed and agree to the assessment of the impacts of the proposed project as well as the proposed mitigation for this project on the Dequindre Cut at the Gratiot Avenue Bridge.

The DRFC appreciates the coordination efforts made on behalf of your department and looks forward to working with MDOT when the time comes to finalize the plan before construction begins. If you need further assistance, please feel free to contact our project executive Karen Slaughter-DuPerry at karen.s.duperry@detroitriverfront.org.

Sincerely,

Mark C. Wallace – President and CEO
Detroit Riverfront Conservancy

C: Karen Slaughter-DuPerry
File



November 13, 2020

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Environmental Services Section
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425 W. Ottawa Street
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Lansing, Michigan 48909

Dear Ms. Upton:

The Detroit Riverfront Conservancy (DRFC) supports the efforts of MDOT I-375 Improvement Project, including the updates to the I-75/I-375 Interchange and replacement of the I-375 freeway with a boulevard.

The DRFC has spoken with yourself regarding the construction of either a new independent outfall or improvement of the existing combined sewer overflow (CSO) outfall sewers to the Detroit River in Wayne County, Detroit. The proposed work will involve the minor temporary impact of the Detroit RiverWalk property and the DRFC understands that it has been determined to qualify as Section 4(f) properties. The DRFC agrees this project will have no permanent impact to the resources and the amount and location of the land to be temporarily used and the temporary trail detour does not significantly impair the use of Section 4(f) properties for their intended purpose.

The DRFC understands and agrees that as a result of this project, that the proposed work will not result in any permanent adverse change to the current activities, features, or attributes which are important to the purposes or functions that qualify the Detroit RiverWalk property for protection under Section 4(f), and that it will include only temporary impacts. The DRFC has also reviewed and agrees to the assessment of the impacts of the proposed project as well as the proposed mitigation for this project on the Detroit RiverWalk.

The DRFC appreciates the coordination efforts made on behalf of your department and looks forward to working with MDOT when the time comes to finalize the plan before construction begins. If you need any further assistance, please feel free to contact our project executive Karen Slaughter-DuPerry at karen.s.duperry@detroitriverfront.org.

Sincerely,

Mark C. Wallace – President and CEO
Detroit Riverfront Conservancy

C: Karen Slaughter-DuPerry
File