

# Finding of No Significant Impact and Supporting Documentation for the I-375 Improvement Project in Detroit, Wayne County, Michigan

MARCH 2022

Prepared by the Michigan Department of  
Transportation in cooperation with the U.S  
Department of Transportation Federal Highway  
Administration.





Michigan Division

March 7, 2022

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In Reply Refer To:  
HDA-MI

Mr. Paul Ajegba, P.E.  
Director  
Michigan Department of Transportation  
425 W. Ottawa St.  
Lansing, MI 48933

Finding of No Significant Impact:  
Interstate 375 (I-375) from I-75/I-375 Interchange and the Gratiot Avenue Connector to the Detroit River, Job Number 130035

Dear Director Ajegba,

The Federal Highway Administration (FHWA) received Michigan Department of Transportation's letter dated March 3, 2022, requesting a Finding of No Significant Impact (FONSI) for the proposed I-375 Project from the I-75/I-375 Interchange and the Gratiot Avenue Connector to the Detroit River, including Jefferson Avenue from Beaubien Street to Rivard Street and intersecting roadways along I-375, City of Detroit, Wayne County.

In accordance with 23 CFR 771, FHWA has determined the selected alternative will not have significant adverse impacts on the human or natural environment. This FONSI is based on the December 22, 2020 Environmental Assessment, summary of the virtual public engagement event held on January 27, 2021, and in person public hearing held on January 28, 2021, and responses to comments received during the public comment period which ended on February 19, 2021.

FHWA independently evaluated this information and determined the documentation adequately and accurately discusses the purpose and need, relevant environmental issues, impacts of the proposed project, appropriate mitigation measures and community enhancements plan. It provides sufficient evidence and analysis to determine an Environmental Impact Statement is not required.

If you have any questions, please contact Brandy Solak, Safety and Operations Engineer by email at [Brandy.Solak@dot.gov](mailto:Brandy.Solak@dot.gov) or by phone at (517) 702-1855.

Sincerely,

*Mark A. Dionise*

Digitally signed by  
MARK ALBERT DIONISE  
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Mark A. Dionise, P.E.  
Engineering and Operations Director  
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For: Theodore G. Burch, P.E.  
Division Administrator

GEF

By e-mail

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File Directory: O:\FHWA Records\ENVI Environmental - Planning and Program  
Development\ENVI 2 National Environmental Policy Act (NEPA) and Related Documents  
File Name: I-375 FONSI Determination\_BNS\_03072022.pdf



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF TRANSPORTATION  
LANSING

PAUL C. AJEGBA  
DIRECTOR

March 3, 2022

Theodore G. Burch, P.E.  
Division Administrator (Acting)  
Federal Highway Administration, Michigan Division  
315 West Allegan Street, Room 201  
Lansing, Michigan 48933

Dear Theodore Burch:

The Michigan Department of Transportation (MDOT) requests a Finding of No Significant Impact (FONSI) for JN 130035, the proposed I-375 Project from the I-75/I-375 Interchange and the Gratiot Avenue Connector to the Detroit River. This includes Jefferson Avenue from Beaubien Street to Rivard Street and intersecting roadways along I-375, City of Detroit, Wayne County.

The Environmental Assessment (EA) for the proposed project was approved by the Federal Highway Administration (FHWA) on December 22, 2020. Copies of the EA were distributed to potentially affected or interested parties and was available online. A legal notice announcing the availability to review the EA and announcing the public hearing was sent out on January 5, 2021, by MDOT. Two engagement events were held during the comment period for the I-375 EA. The first was a virtual event, held on January 27, 2021, and was attended by 169 people. The second was an in-person public hearing, held on January 28, 2021, and was attended by 22 people. The in-person hearing was held at the former UAW-GM Center for Human Resources in Detroit, Michigan.

In summary, the selected alternative includes:

- The I-75/I-375 Interchange will be an urban-type interchange with right-hand on-and off-ramps that will provide access to the Eastern Market, Gratiot Avenue, the new boulevard, Brush Street, and Mack Avenue. This improvement will make all ramps on the right side of the freeway.
- Braided ramps to and from Mack Avenue on I-75, meaning the ramps will pass over other ramps to and from the boulevard using bridges to separate the roadways and ramp traffic, eliminating weaving, or conflict points.

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LH-LAN-0 (05/2020)

- Additional connectivity and access will be provided with a new bridge connecting Brush Park and Eastern Market, additional street connections in Eastern Market, and access to Brush Park from southbound I-75.
- A street-level boulevard will begin south of the I-75/I-375 Interchange and continue to the Detroit River, opening additional connections to the Detroit Riverfront, Eastern Market, Brush Park, and a new local connector street from Eastern Market to Gratiot Avenue.
- Signalized intersections will be located along the boulevard at Jefferson Avenue, Larned Street, Lafayette Avenue, Monroe Street, Macomb Street, Clinton Street, Gratiot Avenue, and at the Blue Cross Blue Shield parking structure.
- Direct left-turns will be allowed at most intersections along the boulevard, except at the intersection with Gratiot Avenue.
- Improved nonmotorized facilities, including a two-way cycle track connecting the Riverfront to the Montcalm Street extension to Gratiot Avenue. The two-way cycle track will then extend west to Brush Street and east to Gratiot Avenue, where it connects with the Dequindre Cut Greenway bicycle path.
- Potential excess real estate property will be available for future redevelopment and/or other purposes.

Enclosed with this FONSI request is a summary of comments, questions, and suggestions made during the public comment period, which officially ended on February 19, 2021. There were agency and public comments regarding historic environmental injustices with the original construction of the I-375 freeway and whether the use of the potential excess property should therefore benefit people from the affected communities. These comments resulted in changes to the EA's proposed mitigation measures and enhancements, including the MDOT acknowledgement that the clearing of the historic neighborhoods for urban renewal projects, which included the I-375 freeway, disproportionately affected black, low-income, and minority populations.

The razing of the Black Bottom and Paradise Valley neighborhoods remains a significant loss to the City of Detroit. To address the historic injustices of property condemnation for construction of the I-375 freeway and in the spirit of implementing Executive Order 12898 on Environmental Justice, MDOT will form a new community-based local advisory committee focused on the recognition of the former predominantly black businesses and residential neighborhoods of Black Bottom and Paradise Valley. This local advisory committee will be tasked with providing meaningful input and ideas on final design elements, as well as on ways to repurpose excess property that will remain after project construction. MDOT will provide engineering and public involvement staff to facilitate the development of ideas, however the intent of MDOT involvement will be to support community-based decision-making.

Theodore G. Burch, P.E.  
Page 3  
March 3, 2022

The local advisory committee will be formed well enough in advance of the final design to include their input into the project and throughout the construction of the project. These and other mitigation measures and enhancements are presented in Chapter 3 (Project Mitigation and Enhancements Summary (Green Sheet)). Chapter 4 (Errata) identifies corrections to the EA, which includes a reduced number of impacted noise receptors.

Based on the enclosed documentation, we request a FONSI be issued, and that location and design approval be granted. We also request that FHWA post the enclosed Notice of Limitation on Claims for Judicial Review of Actions in the Federal Register.

Thank you for your consideration. If you have any questions, please feel free to contact me or Bradley C. Wieferich, Bureau of Development Director, at 517-241-3998 or [WieferichB@Michigan.gov](mailto:WieferichB@Michigan.gov).

Sincerely,

 Paul C. Ajegba, P.E.  
Mar 3 2022 4:35 PM

Paul C. Ajegba, P.E.  
Director

Enclosures

cc: Brad Wieferich



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**DOCUMENTATION SUPPORTING A FINDING OF NO SIGNIFICANT IMPACT FOR THE  
PROPOSED I-375 IMPROVEMENT PROJECT IN DETROIT, WAYNE COUNTY, MICHIGAN  
CONTROL SECTION 82111, 82195, 82196, 82251, 82072, JOB NUMBER 130035**

## 1. Proposed Project

### 1.1. Historical Context and Proposed Community Enhancements

The Michigan Department of Transportation (MDOT), through early and ongoing interaction with the local community, heard several historical accounts of environmental injustices suffered with the original construction of I-375, which is documented in greater detail and added to the text of the Environmental Assessment (EA) in **Chapter 4 (Errata)** of this FONSI document. MDOT found that this history is deeply difficult for many Detroit residents. MDOT also heard from the general public, as well as the Project's Local Advisory Committee (LAC) and Government Advisory Committee (GAC), that the local community prefers replacement of the freeway with a facility that provides greater community connectivity and more transportation options. That input contributed to the design of the Preferred Alternative, which was presented in the EA.

Public input regarding this historical context also contributed to the mitigation measures and community enhancements commitments for the project. The reconstruction of I-375, while it resurfaced historic injustices, provides an opportunity to establish a more equitable future direction for the use of excess property no longer needed for transportation. The Preferred Alternative will result in an unusually large amount of excess right-of-way (ROW). MDOT proposes to use the value of excess property to fund community priorities identified during the I-375 outreach efforts. MDOT wants to empower the local community to help determine the use of these funds and has developed a procedure under which a stakeholder group would assist MDOT on how to best acknowledge historic inequity in the treatment of minority residents and business owners and provide a solid plan for the future use of nearly 30 acres of excess urban property. The following sections further summarize the Project development and describe the Preferred Alternative, ultimately chosen as the Selected Alternative, see **Section 1.5 (Selected Alternative)**.

### 1.2. Project Location

The Project area is within the city of Detroit in Wayne County, Michigan, see **Figure 1**. The following extents define the Project area:

- I-375 from I-75 to south of Jefferson Avenue to the Detroit Riverfront, including I-375 west to where it ties into Beaubien Street
- I-75 from south of Mack Avenue to west of John R Street
- I-75/I-375 Interchange, including all ramps, and the Gratiot Avenue Connector
- Gratiot Avenue from south of Beaubien Street to east of the Dequindre Cut Greenway
- Jefferson Avenue from Beaubien Street to Rivard Street



Figure 1: Environmental Assessment Project Area



### 1.3. EA Publication, Public Hearing, and Agency and Public Review

Legal notices were placed on January 5, 2021, to announce the availability of the I-375 EA for review and a public hearing to provide comment. The legal notice was included in the following publications a total of 11 times: Lansing State Journal, Detroit News, and Detroit Free Press. Due to COVID-19, there was concern that some of the public would not be able to attend an in-person public event. Two engagement events were held during the 45-day comment period for the I-375 Environmental Assessment. The first was a virtual public engagement event, held on January 27, 2021, and attended by 169 people. The second was an in-person public hearing, held on January 28, 2021, and attended by 22 people. The in-person event was held at the former UAW-GM Center for Human Resources in Detroit in accordance with all the COVID-19 guidelines and protocols in place at the time. The virtual event included the same materials as the public hearing to ensure those that were limited from attending in person also had an opportunity to see the narrated presentation, video simulation of the Preferred Alternative, and offer comments. Comments were recorded by the study team at the online event and included as part of the public comments. A court reporter was available at the in-person event. The public hearing was held in accordance with Federal and State Public Involvement/Public Hearing Procedures. The 45-day comment period ended on February 19, 2021. A full summary of the events can be found in **Appendix A**.

There were agency and public comments regarding historic environmental injustices with the original construction of the I-375 freeway. Other comments suggested various ways to use the excess real property<sup>1</sup> that might benefit the affected communities, such as providing an opportunity for black-owned businesses to acquire the property, transferring the property to the city of Detroit, or returning ownership to the original owners and residents. To address these, MDOT acknowledges the impacts suffered by residents and business owners in the former Black Bottom and Paradise Valley neighborhoods when I-375 was originally constructed. MDOT developed a process by which the community can provide meaningful input on things that can be incorporated into final design and construction. The process will begin with the formation of a new community-based local advisory committee that will create a community enhancements plan. Additional information is presented in **Chapter 3 (Project Mitigation and Community Enhancements Summary (Green Sheet))**. **Chapter 4 (Errata)** also indicates corrections to the Environmental Assessment, which includes a reduced number of impacted noise receptors.

### 1.4. Consistency with Stated Purpose and Need

The Project meets the stated purpose and need documented in the EA in that it addresses the outdated interchange design and deteriorated bridges and roadways, addresses existing and future transportation needs, improves connectivity and access for all users, and is aligned with local future development and place-making opportunities. The purpose and need for the Project have not changed from what was published in the EA. This section provides a summary of the detailed Purpose and Need Statement presented in EA Section 2. Commitments addressing this purpose and need are included in Section 3 (Green Sheet).

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<sup>1</sup> As defined in MDOT's *Real Estate Procedure Manual*, excess real property is the real property located either outside or inside the approved Right-of-Way that has been deemed no longer necessary for the continued operation, maintenance and safety of the highway facility and such disposal of certain real property interests would not impair the highway or interfere with the free and safe flow of traffic.

### 1.4.1. Project Purpose

The purpose for the I-375 Improvement Project is to identify a transportation improvement alternative that will achieve the following goals:

- Address outdated interchange design, deteriorated bridges and roadways with an appropriate solution, which considers safety, operations and long-term lifecycle costs.
- Address existing and future transportation needs and roadway safety for all users.
- Improve connectivity to surrounding areas for both vehicular and nonmotorized users, and enhance connections to existing and planned transit services, which may result in improved community health.
- Enhance access to enable future development and other placemaking opportunities envisioned in official land use and long-term economic development plans.

### 1.4.2. Project Need

The I-375 Improvement Project will address the needs described in the following sections.

#### 1.4.2.1 Outdated Design

The I-375 and I-75/I-375 Interchange and the freeway bridges are outdated and no longer reflect current roadway design standards. The deficiencies identified in the project area include a tight roadway curve at the south end of I375 (Jefferson Avenue Curve), tight curves along mainline northbound I-75 mainline, inadequate distance to merge into traffic at Larned Street and Lafayette Avenue, inadequate visibility on southbound I-375 at the Lafayette Avenue exit, and confusing left lane entrance and exit ramps at Madison Avenue. Other roadway curves do not meet current design standards and need to be lengthened to improve the driver's ability to safely see other traffic.

#### 1.4.2.2 Condition of Bridges and Roadways

Structural components of Larned Street and Jefferson Avenue bridges are structurally deficient and are rated poor. The deck of the Gratiot Avenue bridge over the Dequindre Cut Greenway is also structurally deficient and is rated poor.

MDOT evaluates pavement condition annually using the Pavement Surface Evaluation Rating (PASER) rating system. The PASER rating system uses a visual inspection to rate surface pavement as Poor, Fair or Good. The most recent assessment, done in 2019, rates I-375 pavement as Poor. The I-75/I-375 Interchange pavement is rated both Fair and Poor.

#### 1.4.2.3 Traffic Operations

Congestion and slowdowns occur on I-375 and adjacent local streets due to high traffic volumes, traffic weaving at ramps and an inefficient mix of direct and indirect turning movements inherent in the current design. Other issues identified include low speed exit ramps, weave and merge maneuvers within the interchange and undesirable lane merges.



#### 1.4.2.4 Safety

Several factors contribute to the need for roadway safety improvements including geometric deficiencies, traffic congestion, poor sight distances, and conflict points with left-turn movements. For non-motorized users, sidewalks gaps, missing pedestrian crossing, narrow walkways, lack of buffers from traffic and confusing roadway configurations. Large blocks and vacant properties also contribute to safety concerns for pedestrians.

#### 1.4.2.5 Connectivity and Access Issues

The I-375 freeway and I-75/I-375 Interchange create a lack of connectivity between the Detroit central business district, Greektown, stadiums, Eastern Market, the neighborhoods to the east, and the Detroit Riverfront. This affects both vehicular access as well as for non-motorized users and transit.

#### 1.4.2.6 Enable Future Development and Placemaking

The I-375 corridor does not currently support the objectives of local land use plans because it creates a barrier between the CBD and the neighborhoods, does not connect to the riverfront, and lacks safe nonmotorized infrastructure.

### 1.5. Selected Alternative

The Preferred Alternative was presented in the EA and is the Selected Alternative for the Project, see **Figure 2**. The Selected Alternative includes the following features:

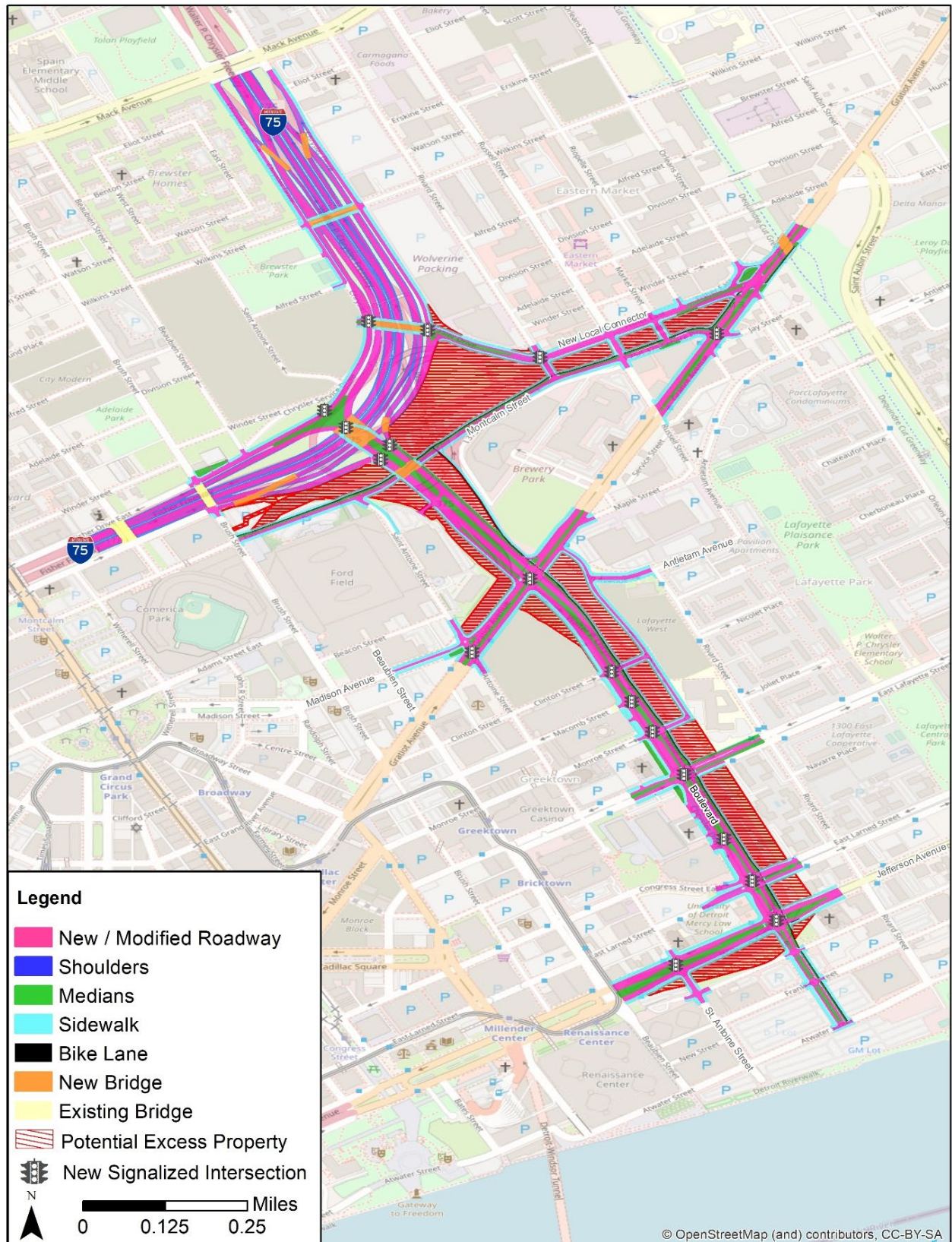
- The I-75/I-375 Interchange will be an urban-type interchange with right-hand on and off ramps that will provide access to the Eastern Market, Gratiot Avenue, the new boulevard, Brush Street, and Mack Avenue. This improvement will make all ramps on the right side of the freeway.
- Braided ramps to and from Mack Avenue on I-75, meaning the ramps will pass over other ramps to and from the boulevard using bridges to separate the roadways and ramp traffic, eliminating weaving, and conflict points.
- Additional connectivity and access will be provided with a new bridge connecting Brush Park and Eastern Market, additional street connections in Eastern Market, and access to Brush Park from southbound I-75.
- A street-level boulevard will begin south of the I-75/I-375 Interchange and continue to the Detroit River, opening up additional connections to the Detroit Riverfront, Eastern Market, Brush Park, and a new local connector street from Eastern Market to Gratiot Avenue.
- Signalized intersections will be located along the boulevard at Jefferson Avenue, Larned Street, Lafayette Avenue, Monroe Street, Macomb Street, Clinton Street, Gratiot Avenue, and at the Blue Cross Blue Shield parking structure.
- Direct left-turns will be allowed at most intersections along the boulevard, except at the intersection with Gratiot Avenue.
- Improved nonmotorized facilities, including a two-way cycle track connecting the Riverfront to the Montcalm Street extension to Gratiot Avenue. The two-way cycle track

will then extend west to Brush Street and east to Gratiot Avenue where it connects with the Dequindre Cut Greenway recreational path.

- Potential excess real property will be available for future redevelopment and/or other purposes. No residential relocations or business displacements are required.

The Project Mitigation and Community Enhancements Summary (Green Sheet) that describes proposed mitigation measures and community enhancements for this Project can be found in **Chapter 3**. Mitigation is required by law. Community enhancements go above and beyond what is required by law and can be used to respond to community input. The Project, along with mitigation measures and community enhancements, is expected to improve quality of life within the community of the Project Area by reconnecting the community; the project will allow for greater cohesion, create opportunity for citizens to use multiple modes of transport, and provide greater access overall. MDOT proposes further public and stakeholder outreach to refine essential quality of life elements of the Project.

**Figure 2: Selected Alternative**





## 1.6. Section 4(f) Resources

There are five Section 4(f) resources in the Project area that are affected by the proposed Project.

The Dequindre Cut Greenway: There will be a temporary occupancy of 1.143 acres. This qualifies as a Section 4(f) exception per 23 CFR 774.13(d), as the duration is temporary, the scope of work is minor, there are no permanent adverse physical impacts, there will be no interference with the protected activities, features, or attributes of the property on either a temporary or permanent basis, and the Section 4(f) property will be fully restored. All trail nonmotorized traffic will be maintained at all times via the existing trail or detours. When construction has been completed, the trail will be returned to as good, or better condition. MDOT completed coordination with the owner with jurisdiction (OWJ), the Detroit Riverfront Conservancy, on November 13, 2020. See EA Appendix C (Agency Coordination) for the signed letter documenting coordination.

The RiverWalk and Iron Belle Trail: There will be temporary occupancy of 0.393 acres. This qualifies as a Section 4(f) exception per 23 CFR 774.13(d), as the duration is temporary, the scope of work is minor, there are no permanent adverse physical impacts, there will be no interference with the protected activities, features, or attributes of the property on either a temporary or permanent basis, and the Section 4(f) property will be fully restored. All nonmotorized traffic will be maintained at all times via the existing trail or detours. When construction has been completed, the trail will be returned to as good, or better condition. MDOT completed coordination with the OWJ, the Detroit Riverfront Conservancy, on November 13, 2020. See EA Appendix C (Agency Coordination) for the signed letter documenting coordination.

Two historic resources and one historic district on or eligible for listing in the National Register of Historic Places (NRHP) will be affected during construction of the boulevard. These include the Holy Family Roman Catholic Church at 641 Walter P. Chrysler Highway, the Mrs. Solomon Sibley House at 976 East Jefferson Avenue, and the Eastern Market Historic District. Roadway and sidewalk construction will result in temporary impacts to 1.52 acres of frontage at Holy Family Roman Catholic Church and 0.17 acres of frontage at the Mrs. Solomon Sibley House. The Eastern Market Historic District may incur similar temporary impacts if work extends beyond the curb line. MDOT will work to avoid and minimize impacts. Access to each of these historic resources will be maintained during and after construction. These temporary impacts will be mitigated with detours during construction and the work will not permanently affect the use, features, or activities of the Section 4(f) resources.

To assess impacts prior to the publication of the EA, MDOT coordinated with the Michigan State Historic Preservation Office (SHPO), which has OWJ oversight of historic properties. SHPO determined that, under Section 106 of the National Historic Preservation Act, the Project will have no adverse effect on historic properties. Based on SHPO's concurrence with the "No Adverse Effect" finding, there will be a temporary occupancy for the Holy Family Roman Catholic Church property, the Mrs. Solomon Sibley House property, and the Eastern Market Historic District. The Project will not affect permanent occupancy, facilities, or functions, nor create substantial noise or visual effects, per 23 CFR 774.13(d), as the duration is temporary, the scope of work is minor, there are no permanent adverse physical impacts, there will be no interference with the protected activities, features, or attributes of the property on either a temporary or permanent basis, and the Section 4(f) property will be fully restored.

Information was presented at two engagement events, a virtual event held on January 27, 2021, and a public hearing held on January 28, 2021, at the former UAW-GM Center for Human Resources in Detroit, showing the proposed impacts to the Section 4(f) properties. No public comments were received on any of the Section 4(f) properties.

A letter was received by the United States Department of the Interior on February 10, 2021, which concurred with the Section 4(f) *de minimis* impact finding, see **Appendix B**. Since the EA was published, it was determined that the Project meets the conditions for temporary occupancy. SHPO concurred with this finding in their correspondence September 28, 2021, included in **Appendix C**.

## 1.7. Permits

The proposed Project will require several permits. Construction of the Selected Alternative requires a permit to construct from the city of Detroit. MDOT will obtain the applicable permits and/or certifications prior to the start of construction.

The Michigan Department of Environment, Great Lakes, and Energy (EGLE) administers floodplain permits under the provisions of Part 31, Water Resources Protection, of the Michigan Natural Resources and Environmental Protection Act of 1994 (NREPA). The Project proposes to occupy, fill, or grade lands in the Detroit River's floodplain to construct a new independent outfall or to reconstruct existing combined sewer overflow (CSO) outfall sewers. Therefore, this permit will be needed to commence this work.

If construction activities need to occur below the ordinary high-water mark of the Detroit River, Part 301, Inland Lakes and Streams, of NREPA will be required under state review.

Through coordination with the U.S. Army Corps of Engineers (USACE), a general Nationwide Permit 7, Outfall Structures and Associated Intake Structures, was determined to be applicable for the construction activity proposed for the Selected Alternative at the Detroit River.

As the proposed Project will disturb an area of soil greater than five acres and have stormwater discharge into the Detroit River, EGLE NPDES MDOT Permit No. MI0057364 (MDOT-Statewide MS4) requires that the MDOT Construction Field Services apply for a NPDES construction permit.

## 1.8. Summary of FHWA Project Determination

An EA for the I-375 Improvement Project was completed by MDOT and approved by the Federal Highway Administration (FHWA) on December 22, 2020. Given the benefits and commitments made as detailed in the Project Mitigation and Community Enhancements Summary (Green Sheet) in **Chapter 3**, FHWA has concluded that there are no significant environmental impacts projected to occur upon implementation of the Project.

## 2. Comments and Responses

The following sections summarize the comments received during the public comment period for the I-375 Environmental Assessment. The comment period lasted 45 days and ended on February 19, 2021. During that time MDOT received 166 written or verbal comments. See **Appendix A** for the public hearing summary. Included in the summary is a breakdown of the

two engagement events described in **Section 1.3 (EA Publication, Public Hearing, and Agency and Public Review)**. See **Appendix B** for all comments received during the 45-day comment period.

## 2.1. Resource Agencies

MDOT received two letters from resource agencies. The comment letters were received from the United States Environmental Protection Agency (USEPA) and the United States Department of the Interior (USDOI). The DOI reviewed the EA and provided no additional comments other than what was noted in **Section 1.6. (Section 4(f) Resources)**.

The USEPA comment and response to the comment is as follows:

**Comment:** The EA states an engineering study will be conducted to consider the needs of pedestrians. The EA did not discuss the feasibility of installing pedestrian/bicycle tunnels and/or bridges, either in lieu of the proposed sidewalks, or in addition to the proposed sidewalks. We recommend FHWA and MDOT consider tunnels and/or bridges when conducting the forthcoming study.

**Response:** Throughout this phase of the Project, the needs of nonmotorized users were considered frequently, and improvements were made to the design. These improvements included adding a protected cycle track, pedestrian refuge islands, and an extensive analysis to improve pedestrian access across and along the corridor, including signal timing improvements. EA Section 4.2.1. (Nonmotorized) provides more information on how nonmotorized users were incorporated into the traffic analysis. Due to longer pedestrian crossing times, MDOT will research and implement Best Management Practices (BMPs), such as seating, within the median to assist persons with disabilities or the elderly.

A study was conducted in 2011 to evaluate six alternatives for the I-375/Madison Avenue Interchange, including an alternative consisting of constructing either a pedestrian bridge or tunnel to cross Gratiot Avenue and Madison Avenue along St. Antoine Street. Discussion of this study is included in the *I-375 Gratiot Avenue/Madison Avenue/St. Antoine Street Technical Memo*, available by request. Pedestrian bridges and tunnels do provide a safe design by separating nonmotorized users from vehicles. These facilities typically add more distance and time for a nonmotorized user to cross a roadway due to lengthy ramps needed to go over or below the roadway. Physical barriers would need to be placed at the intersection to block users from taking the shorter path. Measures to channel nonmotorized traffic are contrary to the Project purpose of improving connectivity for all users and also constrain future placemaking opportunities envisioned in official land use and long-term economic development plans.

Tunnels in the study area would be very difficult to construct due to the large number of utilities underground, which includes a large steam tunnel under I-375 near Gratiot Avenue. Additionally, the drainage for a pedestrian tunnel would be challenging due to the Project's close proximity to the Detroit River and larger recent storm events contributing to flooding of depressed infrastructure. Due to the cost, additional travel time required for the pedestrian, and safety concerns, these alternatives were dismissed from consideration.

The agency letters can be found in **Appendix B**.

## 2.2. State Representative

MDOT received one letter from Michigan State Senator Stephanie Chang from the 1<sup>st</sup> District, which can be found in **Appendix B**. A summary of the comments and responses to comments is as follows:

**Comment:** I urge MDOT and the city of Detroit to work closely with residents to determine the best and most appropriate use for any such excess land that becomes available, so that those who live closest and will be most impacted by noise, traffic, vibration, and air pollution are able to express their needs and concerns.

**Response:** EA Section 4.20. (Project Mitigation and Community Enhancements Summary (Green Sheet)) and EA Section 6.6. (Design of the Preferred Alternative) explain that during and after the design phase of the study, the Project team will explore opportunities and engage with stakeholders and the public on how to acknowledge the impact of past freeway construction and urban renewal efforts on the Black Bottom and Paradise Valley communities. The Green Sheet in EA Chapter 4 has been amended to detail the formation of a local advisory committee, see **Chapter 3**. This local advisory committee will be tasked with providing meaningful input and ideas on final design elements, as well as ways to repurpose excess real property. This will include assisting MDOT and the city of Detroit in the development of a land use framework plan and providing zoning recommendations for the potential excess real property from the Project. Recommendations exploring different land use configurations for excess real property resulting from Project implementation will be sought from the local advisory committee. The potential excess real property will be vetted and processed in accordance with MDOT's *Real Estate Procedure Manual*. The transfer and use of excess real property will follow FHWA requirements.

**Comment:** I urge MDOT to consider recommendations from the community to ensure greater pedestrian safety, such as a reduction in number of lanes on the boulevard, a low speed limit, and even wider sidewalks.

**Response:** The Selected Alternative will increase sidewalk widths, provide dedicated cycle tracks, provide pedestrian countdown signals, install pedestrian refuge islands, and will implement no-turn-on-red for westbound approaches at the boulevard to improved nonmotorized safety within the study area. This is detailed in EA Section 3.1.5. (Refinements to Practical Alternative 5). EA Section 4.3. (Nonmotorized Safety and Vehicular Safety) details how the Selected Alternative affects nonmotorized safety. Sidewalk widths and nonmotorized facilities in the study area were determined by MDOT through a series of workshops with the city of Detroit and SEMCOG, as well as LAC and GAC meetings and numerous one-on-one stakeholder meetings. The Selected Alternative sidewalk widths were maximized within the limits of the right-of-way while also accommodating the number of travel lanes and cycle track. Through the design phase, MDOT will look for opportunities to increase sidewalk widths within the study area.

EA Section 4.2.2. (Vehicular) summarizes the extensive transportation analysis that was conducted with the study area. It was found that the number of lanes is needed to support traffic volumes anticipated along the boulevard. A street-level boulevard will begin south of the I-75/I-375 Interchange and continue to the Detroit River. North of Jefferson Avenue, there will be three lanes in each direction along the boulevard. Three

lanes are needed based on future year 2040 traffic volumes to prevent traffic backups onto the freeway. South of Jefferson Avenue, there will be two lanes in each direction.

This Project is unique because of the changes to how the overall road network operates. The freeway removal introduces reduced speeds with a boulevard, but also introduces new, more direct routes in the interchange and throughout the project area. As part of the amended Green Sheet in **Chapter 3**, one year after the Project is constructed and open to traffic, MDOT will conduct an analysis to evaluate the operations of all modes of transportation in and around the boulevard.

The boulevard will be signed as 35 miles per hour (mph) south of the I-75/I-375 Interchange. South of Jefferson Avenue, it is expected that the boulevard will be signed as 25 mph, since this section is not under the jurisdiction of MDOT. This is described in EA Section 4.3.3 (Vehicular Safety). The Selected Alternative's lower speed limits will improve nonmotorized safety by having slower vehicles in the corridor. They are also consistent with other speed limits within the city of Detroit.

MDOT will also review BMPs to reduce speeds along the corridor during the design phase to encourage lower vehicular speeds. Some of these BMPs include adding visual cues along the corridor from surrounding land uses and adding additional traffic calming features. During the design phase, MDOT will evaluate the lane widths along the boulevard to determine if the pedestrian crossing time can be further decreased.

**Comment:** I urge MDOT and the City to work collaboratively with neighborhood residents to explore other possible solutions besides a noise wall to lessen the noise impact.

**Response:** Noise abatement alternatives were considered for the Project aside from noise barriers. The alternatives included reducing the speed of the freeway, restricting trucks, changing the design of the freeway, acquiring property near the freeway, and constructing noise berms. Given the urban nature of the corridor and the facility type, none of the alternatives were considered practical, reasonable, or feasible. Therefore, the construction of noise walls within the existing ROW was the only mitigation measure that received in-depth evaluation. Two noise walls were evaluated along the I-75 freeway in the study area. Neither location met the feasible and reasonableness criteria. This means the cost to construct the noise walls was not reasonable based upon the amount of noise reduction that would be provided. Chapter 5.1 of the *I-375 Improvement Study Traffic Noise Analysis Technical Memorandum*, (Appendix E of the EA) lists the noise abatement alternatives considered for the Project. See also Section 4.8 (Noise and Vibration) of the EA.

**Comment:** I am doubtful that the assumption declared in the EA that there are no expected increases in traffic will hold true. The combined impact of the removal of parking spaces and the potential for development that may lead to greater parking need is concerning. I hope that the city of Detroit will implement parking policies that would address parking concerns well in advance.

**Response:** A detailed and robust traffic analysis was conducted not only within the study corridor, but within a broader study area which included the greater downtown Detroit area. The traffic analysis was done in coordination with the Southeast Michigan Council of Governments (SEMCOG) to understand and model the correct origin-



destination pairs within the study area. This is summarized in the *I-375 Improvement Study Traffic Technical Memorandum*, located on the I-375 website. The Project included a year 2040 traffic analysis, which incorporated a growth factor of 0.5% per year compounded from 2017 to 2040.

EA Section 4.4. (Parking) summarizes the Selected Alternative and impacts to on-street parking, as well as private parking lots, within the Project area and describes the areas that would be impacted by a decrease in available parking. Two areas that would be impacted by a decrease in available parking are the northbound I-375 Service Drive between Jefferson Avenue and Antietam Avenue and the northbound I-75 Service Drive from Rivard Street to Mack Avenue. The parking on the northbound I-375 Service Drive between Jefferson Avenue and Antietam Avenue is on-street parking that is not metered. Current land use abutting the service drive is multi-family residential and government/institutional. Future development along the corridor may create additional parking needs in the area and will follow land use parking requirements.

The parking on the northbound I-75 Service Drive from Rivard Street to Mack Avenue is on-street parking that is not metered in the Eastern Market area and is less frequently used during typical weekdays. Parking concerns on event days are acknowledged in the *Eastern Market Neighborhood Framework Plan*.<sup>2</sup> The plan suggests that parking congestion can be alleviated through parking management programs to better manage the distribution of parking throughout the Core Market area.

The Selected Alternative will create new access between the Event Area and Eastern Market, opening up additional parking opportunities for both areas. The new Montcalm Street connection includes sidewalks and a cycle track that will allow visitors to park and then use the nonmotorized facilities to reach their destination. This new connection provides nonmotorized access to large parking facilities that are available in both Eastern Market and the Event Area, creating shorter walking times from the parking facilities to these event areas.

The city of Detroit is responsible for parking enforcement within the study area. The city of Detroit enables and enforces parking restrictions. MDOT will continue to work with the city of Detroit before and during construction if parking issues arise.

**Comment:** The Environmental Assessment recognizes that the proposed change and potential future plans for the area may increase property values and rents, but states that improved pedestrian access, infrastructure connectivity and the environment outweigh the negative impact. I cannot agree that displacement due to rising rents is less impactful to a person than walkability. I recognize that the City has taken important steps to address the rising cost of rent in the city, and I will also continue to try to advance policies at the state level related to housing injustice.

**Response:** MDOT recognizes within EA Section 4.15. (Indirect and Cumulative Effects) that property values and rents may increase as a result of the Project, resulting in a negative impact on low- and moderate-income residents in the income area, including pricing out existing owners and renters. The city of Detroit recognizes this issue and has implemented a number of programs and policies to address this issue,

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<sup>2</sup> City of Detroit. (2019). Eastern Market Neighborhood Framework and Stormwater Management Network Plan.



such as the Inclusionary Housing Ordinance, the Community Benefits Ordinance, the Housing Rehabilitation and Development Program, and the Preservation Program. The city of Detroit Inclusionary Housing Ordinance was passed in 2017 to ensure that a new development in the city that receives a public subsidy would provide housing affordable to a range of income levels. The Community Benefits Ordinance provides a mechanism to create a Neighborhood Advisory Council to determine a binding agreement to provide benefits to the community based on a new development. These benefits vary by development and this Ordinance has been implemented on more than nine projects with over 500 participants. The Housing Rehabilitation and Development Program provides funding to support the rehabilitation and/or development of affordable housing units in the city of Detroit. The Preservation Program developed the *Detroit Preservation Action Plan*. The plan serves as a guide to prevent housing units that are affordable for working, aging, low-income and vulnerable Detroiters from disappearing. In the immediate future, Detroit has set an ambitious goal to preserve the affordability of 10,000 units of housing by 2023 to retain quality affordable housing options for residents. These different ordinances and programs are examples of ongoing local initiatives to reduce displacement of current inhabitants, that may offer ideas for the excess real property future development framework.

MDOT has added a commitment to form a local advisory committee, which will study and recommend methods of addressing the potential for rising property values and rents. While MDOT is not a housing agency, the proposed framework for the sale and development of excess real property from I-375 may identify partnerships and existing initiatives aimed at keeping affordable housing in re-developing parts of Detroit. This local advisory committee will be tasked with providing meaningful input and ideas on final design elements, as well as ways to repurpose excess real property. This will include assisting MDOT and the city of Detroit in the development of a land use framework plan and providing zoning recommendations for the potential excess real property from the Project. The potential excess real property would be vetted and processed in accordance with MDOT's *Real Estate Procedure Manual*. The transfer and use of excess real property will follow FHWA requirements. The local advisory committee will also be tasked with guiding the preparation of a community enhancements plan to address social equity and historic environmental justice that will include ensuring that affordable housing opportunities remain present in the Project area and the area of benefit to be recommended in the community enhancements plan.

**Comment:** As the Project moves forward, I would urge MDOT to engage the community as fully as possible so that residents are aware of what the Project will entail, what the impact of construction will be, and who they can contact with any concerns, and so they can express issues as they arise. Please consider me as a partner in getting information out to residents and assisting with communication.

**Response:** MDOT intends to have several more public meetings throughout the design and construction of the Project, including discussions on aesthetics, maintenance of traffic, and special event traffic management. MDOT appreciates the partnership with the State Senator Stephanie Chang from the 1<sup>st</sup> District.

## 2.3. Comments from the Public

In addition to the two resource agency letters and one state representative letter, there were 163 additional comments recorded from the public during the 45-day comment period. A

summary table of the comments can be found in **Table 1**. MDOT received letters from the following seven specific stakeholders within the study area:

- Bedrock Detroit
- Blue Cross Blue Shield of Michigan
- Community of Detroit Entrepreneurs
- Detroit Disability Power
- Detroit Greenways Coalition
- Detroit Theatre District Businesses
- Greektown Casino and Hotel
- Greektown Neighborhood Partnership
- University of Detroit Mercy Law

A listing of all the comments can be found in **Appendix B**.

Table 1 Public Comment Summary

Topic	Comment	Response
General Support	Turning I-375 into an at-grade boulevard is an incredible improvement from existing conditions and will help Detroit grow in the future by creating a more welcoming downtown for pedestrians and cyclists.	Comments recorded.
	Support proposal to extend Montcalm to Gratiot in the Preferred Alternative.	
	The Preferred Alternative will help reconnect downtown to Eastern Market, the Dequindre Cut, Lafayette Park, and the Jefferson corridor; increase walkability; provide more land usage for developments; and save money on future bridge maintenance.	
	The Preferred Alternative largely achieves the project purposes and needs.	
	The boulevard will reinvigorate the Lafayette Park neighborhood due to enhanced walkability from the more developed Greektown and remove the eyesore that is I-375.	
	Bedrock commends the projects efforts to replace outdated infrastructure, build better connections within downtown Detroit and surrounding neighborhoods, and create new opportunities for jobs and housing. Bedrock looks forward to contributing the I-375 Improvement Project as a partner. The I-375 corridor is vital to the next generations of Bedrock’s transformation investments in Detroit.	
	BCBSM supports the Preferred Alternative and believes it is the best design alternate to promote long-term viability in the area.	
General Opposition	I support the removal of I-375.	EA Chapter 2. (Purpose and Need) describes the purpose and need of the Project. As indicated in EA Section 4.2.2. (Vehicular), the analysis shows the addition of travel time but not severe congestion due to the Project. EA Section 4.2. (Nonmotorized Operations and Vehicular Operations) indicates that the Selected Alternative was designed to improve connectivity and walkability within the study area.
	I-375 should be filled in and used for city development.	
	This project will cause more congestion.	
	Travel and traffic downtown are already too congested.	
	Need to revisit the design to address safety and disconnection issues.	
Environmental Justice	Does not improve connectivity or walkability.	EA Section 4.20. (Project Mitigation and Community Enhancements Summary (Green Sheet)) and EA Section 6.6. (Design of the Preferred Alternative) explain that during and after the design phase of the study, the Project team will explore opportunities and engage with stakeholders and the public on how to recognize the historical significance and contributions of the Black Bottom and Paradise Valley communities which were displaced in conjunction with the original I-375 construction.
	The construction of I-375 destroyed the Black Bottom neighborhood and some black-owned businesses. Removing the freeway is an opportunity to repair damage from historical mistakes. The project should acknowledge this history and include reparations, such as State and Federal funding to provide opportunities for Black owned businesses in this area of redevelopment, naming the new boulevard Hastings Boulevard, and creating a public space with a monument dedicated to Black Bottom and its history.	
	This project will weave the fragmented city back together.	
	The new boulevard should replace what was lost in the implementation of I-375. The new proposal must include urban mixed use and address the racial crimes the state and federal government committed by putting it in, in the first place.	
	Establish an intentional, transparent, and collaborative approach to define the future of the excess land that will be available for development after the construction of I-375. MDOT, the city of Detroit, and local agencies must acknowledge that the construction of I-375 disenfranchised, demolished, and displaced the businesses and property of Detroiters, especially Black Detroiters.	
	MDOT has the opportunity to design a pivotal project that rights the previous wrongs of demolishing Black Bottom for I-375 by creating a more intentional development that is future oriented and considers the wishes and aspirations of all Detroit residents.	The sale or use of excess limited access right-of-way (LAROW), which was secured using federal funds for transportation purposes during the original freeway construction, creates an opportunity to fund community enhancements that relate to the historic injustices of the original construction. MDOT has outlined a process for development of a community enhancements plan to address social equity and historic environmental justice impacts from the original construction of I-375. The community enhancements plan will develop a process to address public comments received from the Environmental Assessment Public Hearing as well as the January 20, 2021, Executive Order on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government. A process has been established to pursue partnerships to develop historic environmental justice community enhancements with the future use or sale of the excess real property. The commitment to community enhancements can be found in the Green Sheet in <b>Chapter 3</b> and <b>Appendix D</b> .

Topic	Comment	Response
Environmental Justice	Will there be opportunity for black owned businesses to acquire the excess real property?	In accordance with MDOT's <i>Real Estate Procedure Manual</i> , FHWA approval will be required for any potential release of property, which was originally secured for I-375 using federal funds. Due to the change in highway orientation and operation proposed by this Project, an engineering and operations review will be performed to determine next steps. The additional acreage may be available for development. MDOT will maintain it as green space until future land use has been determined and/or the property is developed. MDOT will follow all federal and state requirements for the disposal of excess right-of-way. Note that the city of Detroit has first right of refusal to purchase excess real property from MDOT for fair market value, however, MDOT may also sell property for less than fair market value if the future use is for a public purpose in the overall best interest of the public. The potential excess real property may also be made available for private development.
	MDOT should transfer ownership of excess real property to the city of Detroit at zero or minimal cost. MDOT and the city of Detroit should research the former ownership of the lands seized and return lands when possible to original owners or residents.	FHWA and MDOT acknowledge that the original construction of I-375 and condemnation of lands to build the freeway resulted in disproportionate impacts to minority and low-income individuals living in the affected neighborhoods. This type of impact occurred with the construction of many urban freeway projects at that time, not only within the city of Detroit. Impacts extended into the post-construction period as the disconnection caused by the expressway damaged the initial survivors of the expressway's construction and resulted in sweeping, multi-generational consequences. Additional historical context has been added to EA Section 4.5.2 (Community Characteristics and Cohesion) documenting how the original project affected the communities of Black Bottom and Paradise Valley. The current National Environmental Policy Act (NEPA) process, adopted in the early 1970s and under which this environmental assessment was prepared, requires agencies to identify and mitigate environmental justice impacts. Executive Order (EO) 12898 on Environmental Justice, issued in 1994, focused more attention on the effects federal actions have on low-income and minority populations. Under EO 12898, FHWA identifies whether low-income and minority populations may suffer disproportionately high and adverse effects of federally funded highway projects. Such effects are identified in consultation with the potentially affected community. This is discussed in EA Section 4.5.6 (Environmental Justice and Title VI).
Environmental Justice	I-375 has racist and discriminatory history and reparations must be made.	<p>EA Section 4.20. (Project Mitigation and Community Enhancements Summary (Green Sheet)) and EA Section 6.6. (Design of the Preferred Alternative) explain that during and after the design phase of the study, the Project team will explore opportunities and engage with stakeholders and the public on how to recognize the historical significance and contributions of the Black Bottom and Paradise Valley communities that were displaced in conjunction with the original I-375 construction. Additional information about the history of I-375 has been added, see <b>Chapter 4</b> (Errata). A means to provide direct reparations for historical impacts through the NEPA process is not available at this time, however, based on comments and concerns identified through the NEPA public involvement process, MDOT has added a commitment to form a local advisory committee to advise on effects of the condemnation and original construction of I-375.</p> <p>The sale or use of excess LAROW, which was secured using federal funds for transportation purposes during the original freeway construction, creates an opportunity to fund community enhancements that relate to the historic injustices of the original construction. MDOT has outlined a process for development of a community enhancements plan to address social equity and historic environmental justice impacts from the original construction of I-375. The community enhancements plan will develop a process to address public comments received from the Environmental Assessment Public Hearing as well as the January 20, 2021, Executive Order on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government. A process has been established to pursue partnerships to develop historic environmental justice community enhancements with the future use or sale of the excess real property. The commitment to community enhancements can be found in the Green Sheet in <b>Chapter 3</b> and <b>Appendix D</b>.</p>

Topic	Comment	Response
Community	Noise, safety, and vehicular access routes to the community should be considered in the project design.	EA Chapter 4. (Affected Environment and Potential Impacts) describes the human and natural environment within the Project area and the potential impacts that would result from the Selected Alternative. See EA Section 4.2. (Nonmotorized Operations and Vehicular Operation), EA Section 4.3. (Nonmotorized Safety and Vehicular Safety), and EA Section 4.8. (Noise and Vibration) for the assessment of how these considerations are addressed in the Project design and proposed mitigation measures.
Community	Greenspace in Lafayette Park, Greektown, and by the River should be used to improve neighborhood connections.	EA Section 4.5.4. (Right-of-Way) and EA Section 4.20. (Project Mitigation and Community Enhancements Summary (Green Sheet)) discuss potential excess real property. The Selected Alternative's surface streets and the I-75/I 375 Interchange require less physical space than the existing freeway. This results in potential excess real property. In accordance with MDOT's <i>Real Estate Procedure Manual</i> , FHWA approval will be required for any potential release of property that was originally secured for I-375 using federal funds. Due to the change in highway orientation and operation proposed by this Project, an engineering and operations review will be performed to determine next steps. The additional acreage may be available for development. MDOT will maintain it as green space (grass) until future land use has been determined.
Community	The project as designed has poor connections between the adjacent neighborhoods and will worsen the separation of the local neighborhoods and downtown. The proposal for Gratiot will create separation between Lafayette Park, Elmwood, and Eastern Market.	EA Section 3.3.3. (Connectivity and Access Issues) describes how the Selected Alternative impacts connectivity within the study area. The Selected Alternative provides additional connectivity and access over the No-Build Alternative and other alternatives considered.
Community	The needs of current and future residents should be prioritized over those of commuters.	The selection of the Preferred Alternative best balanced the needs of all users of the corridor, including the consideration of nonmotorized and motorized users. EA Chapter 2 (Purpose and Need) describes the purpose and need of the Project, which guided the development of the alternatives, as well as the ultimate selection of the Preferred Alternative.
Community	The project has a direct effect on the social and economic environment of Greektown during project construction. This impact has the potential to negatively affect the district for years to come without proper mitigation and coordination. The Environmental Assessment errata should include mitigation measures in the "Green Sheet" and other areas of the EA which specifically address the impacts of the I-375 Improvement Project on the Greektown District. Greektown must have reasonable ingress and egress to the district during project construction, and mitigation efforts that are satisfactory to the neighborhood.	EA Section 4.20. (Project Mitigation and Community Enhancements Summary (Green Sheet)) and item 9. (Construction) of the Green Sheet in <b>Chapter 3</b> indicate that MDOT will develop a detailed traffic management plan for construction during the design phase. Additional meetings will be held during the design phase to discuss maintenance of traffic options, which will include detour routes for any closures. To the greatest extent possible, access to the service drives and adjacent properties will be maintained throughout construction.
Community	It is appropriate to cite the <i>Greektown Neighborhood Framework Vision</i> in the EA, just as it recognizes the <i>Your! Detroit East Riverfront Study</i> and the <i>Eastern Market Neighborhood Framework Plan</i> , aligning with future development and placemaking in the project area.	MDOT and FHWA acknowledge the importance of the <i>Greektown Neighborhood Framework Vision</i> within the study area and have incorporated that vision while considering the Preferred Alternative. The study team held two meetings with Greektown since 2016, as well as several meetings with the city of Detroit to incorporate the vision. Greektown was also a part of the Project's Local Advisory Committee (LAC) as part of this Project.
Community	Need to encourage drivers to use Gratiot Avenue as the primary gateway into downtown and not encourage the use of the boulevard	With the Selected Alternative, Gratiot Avenue will become better utilized and become another gateway into downtown Detroit which does not exist today. While there will still be those that need to use the boulevard, the Selected Alternative gives more options and access into and out of downtown.
Design – Freeway	Reconstruction of I-375 should include plazas in place of at-grade intersections and a plaza over the existing Gratiot connector.	Section 4.4 of the 2016 <i>Planning and Environmental Linkages Study</i> located on the I-375 Project website considered a public plaza space or development area. The alternative was considered and dismissed due to lack of connectivity and cost. This alternative does not meet the purpose and need of the Project. EA Section 3.1.3. (Illustrative Alternatives) summarizes the final alternatives from the 2016 <i>Planning and Environmental Linkages Study</i> , which considered a greenway alternative. The greenway alternative could also be a form of a plaza along the boulevard. This alternative was not moved forward as it did not adequately meet the purpose and need of the Project as defined in EA Chapter 2. (Purpose and Need).



Topic	Comment	Response
<b>Design – Freeway</b>	I-375 should remain a freeway.	During the alternatives screening process MDOT considered a wide range of alternatives, including the alternative to do nothing (the “No-Build Alternative”), as well as two alternatives that would reconstruct I-375 as a freeway (Illustrative Alternative 1 and Illustrative Alternative 2). The No-Build Alternative would maintain the existing configuration of I-375. Through the screening process the No-Build Alternative was found to not meet the Project purpose and need (EA Chapter 2. (Purpose and Need)) and was dismissed from further consideration. EA Section 3.1.1. (No-Build Alternative) provides more information on the No-Build Alternative and why it was eliminated. The screening also concluded that the boulevard alternatives (Illustrative Alternatives 4 and 5), and Illustrative Interchange Alternative 2, best met the Project purpose and need and advanced for further study in the EA. EA Section 3.1.3 (Illustrative Alternatives) provides more information on the Illustrative Alternatives.
<b>Environment – Air and Noise Quality</b>	Increased traffic density and a subsequent increase in air pollutant emissions and noise poses concerns regarding: <ul style="list-style-type: none"><li>• The health of cyclists and walkers</li><li>• Impacts on climate change/environment</li><li>• Neighborhood air quality</li><li>• Neighborhood noise pollution</li></ul>	<p>There are no anticipated impacts to air quality. The air quality analysis found that the Project is not one of air quality concern and that it meets state and federal regulations. The Project is included in SEMCOG’s 2045 <i>Regional Transportation Plan for Southeast Michigan</i>, project Number 13286 (SEMCOG, 2013). Design and ROW of the Project is included in the Fiscal Year 2020-2023 Transportation Improvement Program for Southeast Michigan project Number 130035 (SEMCOG, 2019). In September 2020, construction of the Project was removed from the current TIP and proposed for inclusion in the year 2027. SEMCOG adopted its <i>2045 Regional Transportation Plan</i> on March 14, 2019, in conformance with the transportation planning requirements of USC Titles 23 and 49, the CAAA, and related regulations. See EA Section 4.7. (Air Quality) for more information.</p> <p>A noise analyses was completed and none of the predicted future noise levels would substantially exceed existing noise levels. Along I-375, noise levels will slightly increase on the west side and slightly decrease on the east side. Potential noise barriers were evaluated along the I-75 freeway but were either not acoustically feasible (did not achieve a significant enough noise reduction) or reasonable (cost exceeds allowable cost per benefited receptor). See EA Section 4.8. (Noise and Vibration) for more information.</p>
<b>Design- Roundabouts</b>	All intersections should be turned into Dutch roundabouts to: <ul style="list-style-type: none"><li>• Prioritize the safety, access, and turning of pedestrians and cyclists</li><li>• Improve traffic flow</li><li>• Create space for trees</li></ul>	A range of intersection designs was considered during the development of the alternatives. Roundabouts were considered and dismissed due to the size of the roundabouts that would be needed as well as the lack of pedestrian friendliness of roundabouts. The Selected Alternative uses traditional intersections on the existing street grid, which avoids substantial right-of-way acquisition that is associated with roundabouts. Traditional intersections will meet the purpose and need of the Project while minimizing the overall footprint of the Selected Alternative.
<b>Design – Nonmotorized</b>	Increase the amount of bike lanes. Would like protected bike lanes rather than a two-way cycle track.	EA Section 3.1.5. (Refinements to Practical Alternative 5) explains that a refinement was made to add a cycle track along the boulevard and along Montcalm Avenue. The two-way cycle track was the preference of the city of Detroit and is safer on the east side of the boulevard due to less driveway and roadway conflicts.
<b>Design – Nonmotorized</b>	Ensure that nonmotorized paths are maintained during winter.	The city of Detroit will be providing maintenance of the nonmotorized facilities for this Project.
<b>Design – Nonmotorized</b>	All cycle track widths should be 12 feet wide, which is the National Association of City Transportation Officials (NACTO) desired width.  Do not allow for the building of additional vehicle access points across the cycle tracks.  Follow NACTO Design Guidelines.	Through the Refinements of Practical Alternative 5, MDOT held meetings with the city of Detroit and determined to utilize the minimum 10 feet side cycle track, which is acceptable by NACTO. Additional access points along the boulevard will be very minimal, with consideration given to how the potential excess real property is parceled and access opportunities from the side streets. MDOT will continue to coordinate with the city of Detroit on developing design criteria throughout the design phase of the Project.
<b>Design – Nonmotorized</b>	The Brush Street bridge should have bicycle facilities that connect Brush Park to the Montcalm cycle track and extends north to the existing Brush Street bike lanes at Wilkins.  Montcalm and Brush are often closed to traffic during stadium events. The Detroit Police Department has installed semi-permanent road closure equipment on both Montcalm and Brush that is not safe for bicyclists to ride over. These two issues lead to the Montcalm cycle track not being a safe connection to downtown.	MDOT has been coordinating with the city of Detroit on future street plans of Brush Street, which is under the jurisdiction of the city of Detroit. Once a decision has been made by the city of Detroit, MDOT will coordinate with any changes for the Brush Street bridge. The next phase of the Project will develop a special event traffic management plan with the Selected Alternative and will consider nonmotorized in that plan.



Topic	Comment	Response
<b>Design – Nonmotorized</b>	<p>I would like to continue to advocate for a European-like bike and pedestrian tunnel connecting Lafayette under the boulevard which would allow non-stop travel with minimal conflicts.</p> <p>Design should go over or under the street.</p>	<p>A study was conducted in 2011 to evaluate six alternatives for the I-375/Madison Avenue Interchange, including an alternative consisting of constructing either a pedestrian bridge or tunnel to cross Gratiot Avenue and Madison Avenue along St. Antoine Street. Discussion of this study is included in the <i>I-375 Gratiot Avenue/Madison Avenue/St. Antoine Street Technical Memo</i>, available by request. Pedestrian bridges and tunnels do provide a very safe design by separating nonmotorized users from vehicles. However, due to the height requirements to add a pedestrian bridge and/or tunnel, these facilities typically add more distance and time for a nonmotorized user to cross a roadway. While a bridge and/or tunnel is a safer option, they are oftentimes avoided due to the longer time and/or distance.</p> <p>Given the urban nature of this corridor, a pedestrian bridge and/or tunnel will likely add time and distance. Physical barriers would need to be placed at the intersection to block users from taking the shorter path. Tunnels in the study area would be very difficult to construct due to the amount of utilities underground, this includes a large steam tunnel under I-375 near Gratiot Avenue. Additionally, the drainage for a pedestrian tunnel would add complexity to the drainage design. There are also safety concerns with an underground tunnel in an urbanized area, where crime can increase due to reduced security and lack of visibility. If pedestrians feel unsafe walking down a tunnel alone at night, they may decide to cross at street-grade, thereby reducing the effect of the tunnel. Due to the cost, additional travel time required for the pedestrian, and safety concerns with a pedestrian tunnel, these alternatives were originally dismissed from consideration.</p>
<b>Design- Nonmotorized</b>	<p>Minimize pedestrian delay throughout this project. Walk intervals should be maximized using “Rest in WALK”. Pedestrian actuation should only be used when necessary. While pedestrian actuation may be desired during peak vehicle travel periods, pedestrian recall should be used outside of peak.</p>	<p>Pedestrian and vehicular traffic signal timings will follow standards set forth by FHWA, which has a standard pedestrian walking speed of 3.5 feet per second. At this time, none of the traffic signals are pedestrian actuated and utilize the standard “walk” time and flash “don’t walk” time. The merits of this comment will be further revisited during the design phase.</p>
<b>Design- Nonmotorized</b>	<p>No-turn-on-red is preferred to increase motorist compliance with traffic control devices while improving safety for pedestrians and bicyclists. Especially concerned about motorist compliance at dual turn slip lanes (e.g., I-75 service drive eastbound (EB) at new local connector, Gratiot westbound (WB) to the boulevard northbound (NB)).</p> <p>Shorter curve radii should be used to reduce vehicle turning speeds across crosswalks and cycle tracks, especially at slip lanes.</p>	<p>No-turn-on-red will be implemented for the westbound approaches along the boulevard where there is a cycle track. There will also be a no-turn-on-red implemented for westbound Gratiot Avenue to the new local connector. MDOT will further evaluate a no-turn-on-red for the NB I-75 off-ramp to the new local connector during the design phase.</p> <p>MDOT will utilize the MDOT Design Guidelines to determine turning radii and review the percentage of trucks in the determination of the turning radii. Design criteria will be established during the next phase of the Project.</p>
<b>Design – Landscaping</b>	<p>Create more space along the boulevard for</p> <ul style="list-style-type: none"><li>Distance between the road and sidewalks/bike lanes</li><li>Green space</li><li>Trees</li></ul>	<p>EA Section 3.1.5. (Refinements to Practical Alternative 5) explains that refinements were made on the distance between the roadway and sidewalks/cycle track and the desire by stakeholders to reduce the footprint of the boulevard. EA Section 4.5.1. (Community Characteristics and Cohesion) indicates that the new boulevard will include landscaping and other aesthetic treatments. EA Section 4.20. (Project Mitigation and Community Enhancements Summary (Green Sheet)) indicates that MDOT will continue to work on aesthetics to develop a guide that maintains the character of the corridor.</p>
<b>Design – Landscaping</b>	<p>Reduce pavement and create more space for stormwater and heat mitigation.</p> <p>Concerned that impervious surface is only decreasing by 9%, and that the road size will not decrease either.</p> <p>This project is a great opportunity to handle stormwater runoff from the abundant and adjacent impervious surfaces (e.g., Eastern Market, stadium parking, etc.). The EA should identify land area for GSI BMPs, which could be green buffers between the boulevard and cycle tracks.</p> <p>Would like to see more green stormwater infrastructure and native vegetation.</p> <p>Consider stormwater design when designing nonmotorized facilities.</p> <p>I hope that you will install green infrastructure like bioswales and/or rain gardens in the new greenspace.</p>	<p>The Selected Alternative will reduce the amount of impervious surfaces in the Project area by 9% from 88.8 acres to 80.8 acres. Eliminating the Gratiot Avenue Connector, introducing a boulevard section with medians and other open green space within the corridor ROW will reduce impervious surface area overall, despite the wider sidewalks, which will be up to 20 feet in width. See EA Section 4.14.5. (Water Quality).</p> <p>EA Section 4.14.2. (Surface Waters) indicates that MDOT will utilize permanent Best Management Practices (BMPs) such as green infrastructure like vegetated swales and bioretention (rain gardens), and pervious pavement where possible to slow runoff and help filter pollutants before the runoff enters receiving waters.</p>

Topic	Comment	Response
<b>Design – Boulevard</b>	<p>Alternatives four and five should be reconsidered, with the following modifications: the service level streets should integrate two-way traffic, additional bicycle lanes, and transit islands should be used for parks and commercial developments.</p> <p>Alternative six should be reconsidered.</p> <p>Turn the six lanes of vehicular traffic into complete streets and use the entirely freed up area vacated by I-375 for new development in parks. It would save money, create more economic opportunity, and reduce the total area of impervious surfaces minimizing storm runoff.</p> <p>Maintain walkability from downtown to the eastside by having more local roads. Maximize space for usability, boulevards do not provide value to drivers nor do they provide values to pedestrians.</p>	EA Section 3.1. (Alternatives Screening) considered each of these alternatives very carefully and conducted a screening to determine which alternative best meets the purpose and need of the Project. The screening process found that the Selected Alternative best met the defined purpose and need of the Project.
<b>Design – Boulevard</b>	Consider incorporating Michigan left turns.	During the alternatives screening process, MDOT evaluated direct and indirect left turns along the boulevard to assess differences in traffic flow, connectivity, nonmotorized access, and safety (see EA Section 3.1. (Alternatives Screening)). Through the screening, direct lefts were found to better fit the context of the Project, reducing travel time for vehicles and the distance needed for pedestrians to cross the boulevard due to a narrower roadway width.
<b>Design – Road Design</b>	<p>Would like to see a two-way conversion for the entire length of Macomb Street.</p> <p>Any street conversions in Greektown must take into account impacts to property owners and the likelihood that entries to parking garages and other businesses may need to be reconfigured to support two-way conversions. Any reconfigurations may require construction and subsequent costs to private property. All potential two-way conversions and studies must include a cost/benefit analysis that directly takes these impacts into account and works with property owners to assess the appropriateness, need, and feasibility of any potential changes to our street patterns, taking into account the realities for business operations on the ground. The city of Detroit’s 2018 Downtown Detroit Transportation Study identifies the majority of streets in Greektown for potential one-way to two-way conversion. These studies should be coordinated with the I-375 Improvement Project. All two-way conversion studies and implementation of those identified as appropriate and beneficial to Greektown should be completed prior to the construction start of the I-375 Improvement Project. The “Green Sheet” should be amended to include these considerations.</p> <p>Land abutting the Greektown Casino-Hotel Garage along the I-375 Service Drive between Monroe and Macomb streets is identified as Temporary ROW utilization for construction. This area is a main access point to the Greektown Casino-Hotel Garage and is used to access the Greektown Casino-Hotel. Any two-way conversions of Macomb and St. Antoine streets will negatively impact access to the Greektown Casino-Hotel Parking Garage and the Greektown Casino-Hotel vehicular entrances.</p>	The Project Mitigation and Community Enhancements Summary (Green Sheet), item 9. (Construction) of the Green Sheet in <b>Chapter 3</b> indicates that MDOT will develop a detailed traffic management plan for construction during the design phase. Additional meetings will be held during the design phase to discuss maintenance of traffic options which will include detour routes for any closures. To the greatest extent possible, access to the service drives and adjacent properties will be maintained throughout construction. MDOT will continue to coordinate with the city of Detroit on any street conversions within the study area. Currently, the design will incorporate roadway conversions for Macomb Street at the boulevard and St. Antoine Street at Gratiot Avenue. Any other roadway conversions are under the jurisdiction and control of the city of Detroit and cannot be incorporated into the Green Sheet. MDOT will need to temporarily utilize the ROW adjacent to the Greektown Casino-Hotel Garage to replace the sidewalk such that it meets Americans with Disabilities Act (ADA) requirements. MDOT will coordinate with Greektown Casino-Hotel to minimize disruptions during the construction.
<b>Design – Road Design</b>	The St. Antoine Street crossing over Gratiot Avenue should be converted to a two-way street as it is an important access point for the Greektown community and could help mitigate traffic flow.	As shown in EA Section 3.3. (Preferred Alternative), St. Antoine Street will be a two-way roadway at Gratiot Avenue. Any other roadway conversions south of Gratiot Avenue are under the jurisdiction and control of the city of Detroit.
<b>Design – Road Design</b>	<p>Comments regarding connections of existing roads:</p> <ul style="list-style-type: none"><li>• Riopelle Street to/from the new local connector to the new Montcalm Street</li><li>• Antietam Avenue should be extended to connect to the intersection at Russell and Maple Streets</li><li>• The new boulevard to Brush Park</li><li>• Would like to see better vehicular, pedestrian, and cyclist connections from the proposed boulevard to the riverfront, Brush Park, and to the former Brewster-Douglass Site.</li></ul>	<p>See response following response on Riopelle Street. Antietam Avenue is under the jurisdiction and control of the city of Detroit and this connection is outside the scope of this Project. Extending the boulevard to Brush Park was analyzed and found that it would impact the operations of the I-75 interchange, so it was dismissed as an option.</p> <p>As shown in EA Section 3.3. (Preferred Alternative), the Selected Alternative provides nonmotorized connections between Brush Park to the Detroit River along the boulevard. There is also a new connection for all users between Brush Park and Eastern Market along the new local connector.</p> <p>The Selected Alternative provides vehicular access to Brush Park and the former Brewster-Douglass site with a connection at the end of the new local connector near I-75. The city of Detroit would be responsible for allowing additional driveway/roadway access east of the new local connector.</p>

Topic	Comment	Response
<b>Design – Road Design</b>	Turn Riopelle into a through street across Gratiot connecting Eastern Market to Lafayette Park.	The connection of Riopelle Street across Gratiot Avenue would be too close to the intersection of Gratiot Avenue and Jay Street and cause safety and operational issues.
<b>Design – Road Design</b>	Several people suggested extensions of existing roads that included: <ul style="list-style-type: none"><li>• New service drive extended from Monroe Street to Larned Street</li><li>• East Montcalm extended to the Eastern Market</li><li>• Antietam Avenue should continue west onto 375 instead of a detoured route to the boulevard</li></ul>	EA Section 3.1.5. (Refinements to Practical Alternative 5) evaluated extending the new service drive between Larned Street and Monroe Street and was removed from consideration due to the closeness these intersections would be to the boulevard and Rivard Street, which would cause safety and operational issues. As shown in EA Section 3.3. (Preferred Alternative), Montcalm Street was extended to Gratiot Avenue. Antietam Avenue was ended at the new local roadway to reduce the number of connections to the boulevard and improve traffic operations and safety along the corridor.
<b>Design – Road Design</b>	Comments regarding improvements to access roads: <ul style="list-style-type: none"><li>• I-75 southbound from Eastern Market and north Lafayette Park</li><li>• North and South access from Madison Street to the new boulevard</li></ul>	As shown in EA Section 3.3. (Preferred Alternative), an additional connection was made between Eastern Market and Lafayette Park with the connection of two-way traffic on Montcalm Street at the intersection of Jay Street and Gratiot Avenue. EA Section 3.2.3. (Gratiot Avenue/Madison Avenue/St. Antoine Street Intersections) detailed the analysis of the intersection and connection of the boulevard. Additional analysis will be performed during final design to refine traffic operations for special events with the Selected Alternative.
<b>Design – Road Design</b>	I like the proposal to connect Gratiot and Jay Street.	Comment recorded.
<b>Design – Road Design</b>	It is unclear why Chrysler Drive is needed. It only serves one building, creates an unnecessary four-way intersection, and reduces space.	Chrysler Drive (new local road) will provide driveway access to the adjacent parcels. A portion of the northbound service drive alignment from Gratiot Avenue south to Clinton Street is kept in the Selected Alternative. This will serve two-way traffic. Replacing this segment of Chrysler Drive allows for the removal of potential driveway connections to the boulevard. Removing driveway connections to the boulevard will help improve traffic flow and safety on the boulevard.
<b>Design – Road Design</b>	How will the project impact residents' use of the Chrysler Service Drive?	Jean Rivard Apartments access along the service drives will be permanently removed. The Project will incorporate appropriate access along Larned Avenue and Lafayette Avenue that provides similar, but slightly more indirect access.
<b>Design – Road Design</b>	It is unclear how drivers will access I-75 from Madison going east.	EA Section 3.2.3. (Gratiot Avenue/Madison Avenue/St. Antoine Street Intersections) details the analysis of the intersection and connection of the boulevard. Eastbound Madison Avenue vehicles will take Brush Street north to the new northbound I-75 on-ramp at the service drive. To access I-75 using the new boulevard, vehicles will take Brush Street or Beaubien Street south to Clinton Street. Vehicles will turn left onto Clinton Street, then turn left onto the new boulevard to access northbound and southbound I-75. Additional analysis will be performed during final design to refine traffic operations for special events with the Selected Alternative. This includes a focus on an eastbound Madison connection to Gratiot Avenue and an eastbound Gratiot connection to the new boulevard.
<b>Design – Road Design</b>	What are the pros and cons East Grand Blvd to Belle Isle Park converted from traffic under Jefferson to traffic at grade level?  I would support the removal of the lodge south of I-75. I can't even walk from Corktown to the downtown without going all the way around.	These areas are outside of the Project study area and were not studied as a part of this Project.
<b>Design – Road Design</b>	The connectivity of St. Antoine Street across Gratiot Avenue for both vehicular and pedestrian flow is a priority for the Greektown District. Greektown requests that the "Green Sheet" be amended to include Greektown by name as a stakeholder in all studies related to this intersection and also to include Greektown in considerations of the special event area analysis.	MDOT will include major stakeholders, including Greektown, in the special event analysis and meetings.

Topic	Comment	Response
Design – Number of Vehicular Travel Lanes	What is the anticipated level of traffic? Does it warrant the number of lanes?	As summarized in EA Section 4.2.2. (Vehicular), the number of lanes is needed to support traffic volumes anticipated along the boulevard. Additionally, MDOT needs to provide enough capacity on the boulevard to ensure that traffic does not back up onto I-75, resulting in safety concerns. A street-level boulevard will begin south of the I-75/I-375 Interchange and continue to the Detroit River. North of Jefferson Avenue, there will be three lanes in each direction along the boulevard. Three lanes are needed based on future year 2040 traffic volumes and included a 20% to 40% diversion to other routes in the study area. South of Jefferson Avenue, there will be two lanes in each direction. The median will separate the directions and there will be direct left-turn allowed at most signalized intersections. Land use and commuting patterns are dynamic elements of the study area that may or may not result in reduced traffic on I-375. Large events at nearby locations and access to destinations, such as Eastern Market and the Riverfront also factor into the proposed number of lanes.
	Reductions in lanes could be justified given the expected traffic reductions from changed work commuting patterns.	
Design – Number of Vehicular Travel Lanes	Need to consider travel demand management and reduced demand and not focus on vehicular level of service.	The Selected Alternative includes multiple improvements to pedestrian and nonmotorized access over the existing conditions. The flow of traffic in and around the boulevard will be very different from today. Extensive traffic analysis has concluded that the proposed number of lanes should function well for the surrounding land use and future vision for the area. However, because the changes are considerable and because it may be difficult to predict how the boulevard may function for all users, once in place, MDOT proposes to conduct a multi-modal operational analysis one year after the boulevard is open to traffic. That analysis will look at the level of demand for the road for all users and identify possible improvements that will enhance safety and operations. See the <b>Green Sheet in Chapter 3</b> .
	Ignore Level of Service for the roadway.	
Design – Number of Vehicular Travel Lanes	Several people suggested that the proposed boulevard has too many vehicular travel lanes and is too wide. Concerns included: <ul style="list-style-type: none"><li>It is unsafe for pedestrians and cyclists.</li><li>There is not enough room for pedestrians,</li><li>It makes pedestrian crossings intimidating.</li><li>It is unjustified for current traffic volumes and will not have full traffic capacity.</li><li>Two turning lanes is unnecessary.</li><li>There is not enough space for new buildings and housing.</li><li>It will divide neighborhoods.</li><li>It maintains a large physical barrier between the east and west sides.</li><li>It encourages speeding.</li><li>Make more room for pedestrians and green space.</li><li>It takes too much time for pedestrians to cross.</li></ul>	
	Several suggestions for boulevard width reduction and replacement of one or more vehicular lanes included: <ul style="list-style-type: none"><li>Two-way bike paths</li><li>A dedicated public transit lane</li><li>Used as green space for trees to improve air quality</li><li>A road diet with two vehicular travel lanes each way</li><li>Developable land</li><li>Greenspace in the median</li><li>Additional turn lanes</li><li>Narrowing the number of lanes at Jefferson</li><li>Reducing to only two lanes of traffic in each direction with additional lane for left turns only at intersections</li><li>Parklets, movable curbs, parking lanes, landscaping, and bulb-outs</li></ul>	



Topic	Comment	Response
<b>Design – Number of Vehicular Travel Lanes</b>	Either the center median should be removed, or a sidewalk should be put through it.	EA Section 3.1.5. (Refinements to Practical Alternative 5) explains that a refinement was made to reduce the median width of the boulevard. The median width that is included in the Selected Alternative is a pedestrian refuge island which improves safety for nonmotorized users.
<b>Design – Number of Vehicular Travel Lanes</b>	It is unclear what MDOT’s standards were in determining how the boulevard design was equally allocated to pedestrians and vehicle traffic.	The Project’s purpose and need statement includes the goal, “Address existing and future transportation needs and roadway safety for all users.” The potential impacts to both nonmotorized and vehicular operations and safety are further discussed in EA Chapter 4 (Affected Environment and Potential Impact).
<b>Land Development</b>	What will happen with the potential excess real property?	The sale or use of excess LAROW which was secured using federal funds for transportation purposes during the original freeway construction, creates an opportunity to fund social equity and historical environmental justice impacts from the original construction of I-375. Once constructed, the reduced footprint of the Selected Alternative, has the potential to create approximately 31 acres of excess LAROW. The potential excess LAROW would be vetted and processed in accordance with MDOT’s <i>Real Estate Procedure Manual</i> . Due to the change in highway orientation and operation proposed by this Project, an engineering and operations review will be performed to determine the necessary ROW requirements for the continued safety, operation, and maintenance of the new facility. Some of the LAROW will be relinquished to the city of Detroit for city street connections. MDOT plans to use the value of the remaining excess real property to address social equity and historic environmental justice impacts from the original construction of I-375. Given the unique circumstances of the Project, a two-phased approach to excess real property disposal will be employed. Details on this approach are included in item 3. of the Green Sheet in <b>Chapter 3</b> .
<b>Land Development</b>	Suggest rezoning the excess real property for residential and commercial zoning. Encourage density in the area to facilitate urban development in the corridor.	Potential excess real property will be handled in accordance with MDOT’s <i>Real Estate Procedure Manual</i> . MDOT has added a commitment to form a local advisory committee to assist MDOT and the city of Detroit in the development of a land use framework plan identifying best uses for potential excess real property from the Project. The transfer and use of excess real property will follow FHWA requirements. The commitment to community enhancements can be found in the Green Sheet in <b>Chapter 3</b> with details in <b>Appendix D</b> .
<b>Land Development</b>	What type of development will be sought after project completion? Allow potential developers to utilize the below grade space created	See EA Section 2.3.5. (Enable Future Development and Placemaking), which discusses consistency with local land use plans. Land use is also discussed in EA Section 4.5.1. (Land Use), future land use and zoning will be determined by the city of Detroit through an open and transparent process.  MDOT will review opportunities to utilize the current below grade space with developers and not fill in the space if the timing of road construction and development are compatible.
<b>Land Development</b>	Use potential excess real property or reduce the west sidewalks to allocate additional width to the east sidewalks along the boulevard to support ground-floor tenants of future mixed-use developments.	Future land use and zoning for the potential excess real property will be determined during the Project design phase and refinements to sidewalk width and/or setbacks for buildings along the boulevard will be considered.
<b>Project – Construction</b>	How will construction impact traffic and local businesses? It is unclear if there is a plan to provide economic relief to local businesses in the area during the time of construction. There are potential adverse impacts to small businesses in Greektown during construction that should be mitigated to preserve the financial and cultural vitality of the district. Cutting off access to the Greektown Casino-Hotel during the construction of I-375 would be devastating to the economic stability of the hotel. We implore MDOT to take this into consideration, through the EA, planning, design, and construction phases of the Project. Would like further clarity on how user-friendly the project’s construction plan will be for commuters and residents throughout the corridor	Access to local businesses will be maintained during construction. Maintenance of traffic concepts will be developed during the design phase, with meetings with local stakeholders. MDOT will develop a detailed traffic management plan that will outline how the Project will be built and how traffic will be managed during work, including detour routes for any closures. To the greatest extent possible, access to the service drives and adjacent properties will be maintained throughout work, with limited short-term closures as needed to rebuild private driveways. See EA Section 4.20 (Project Mitigation and Community Enhancements Summary (Green Sheet)).  While MDOT does not provide economic relief to local businesses due to construction, MDOT will coordinate with local businesses to provide signage and access information during construction and continue to have discussions with local stakeholders on maintenance of traffic before and during construction.

Topic	Comment	Response
<b>Project – Construction</b>	<p>I-375 construction will render the Greektown Casino-Hotel as not accessible, resulting in substantial economic impacts. Any two-way conversions of Macomb and St. Antoine streets will impact the Greektown Casino-Hotel Parking Garage and the Greektown Casino-Hotel vehicular entrances.</p> <p>Greektown Casino-Hotel is requesting that the EA errata sheet include mitigation measures in the “Green Sheet” and other areas of the EA to specifically address the impacts of the I-375 Project on the Greektown Casino-Hotel. It is critical that Greektown Casino-Hotel be allowed to participate in preparation of the traffic management plan. A reasonable alternative must be provided during any closure periods that provides for easy on and off access to the highway. Greektown Casino-Hotel believes that the Project would have a direct negative effect on its operations, employees, and revenues during the construction phases and that this impact has the potential to adversely affect us for years to come without proper mitigation.</p>	<p>See previous response. Vehicular and nonmotorized access to Greektown Casino-Hotel will be maintained during construction. MDOT will coordinate with Greektown Casino-Hotel during the development of the maintenance of traffic concepts and throughout construction. MDOT will continue to coordinate with major stakeholders within the corridor before and during the construction of the Project through one-on-one, group, and public meetings. After construction, access to Greektown Casino-Hotel will have more accessibility and visibility by having better access to the boulevard as compared to I-375.</p>
<b>Project – Financial Cost</b>	<p>Where does funding for the project come from?</p>	<p>The Federal-Aid Highway Program is used to fund highway projects like this one and is provided to states using a formula established in the FAST Act. Congress considers increases in surface transportation spending as part of broad infrastructure funding packages with formulas determined by Congress in surface transportation authorization acts. The Project will result in the creation of excess real property. In accordance with MDOT’s <i>Real Estate Procedure Manual</i>, Federal Highway Administration (FHWA) approval will be required for any potential release of limited access ROW (LAROW), which was secured using federal funds for transportation purposes during the original freeway construction. Due to the change in highway orientation and operation proposed by this Project, an engineering and operations review will be performed to determine the necessary ROW requirements for the continued safety, operation, and maintenance of the new facility. Some of the LAROW will be relinquished to the city of Detroit for city street connections. MDOT plans to use the value of the remaining excess real property to address historical environmental justice (HEJ) impacts and social equity (SE) concerns. Funding for any activities following land disposition shall come from the sale of excess real property. During design, MDOT will evaluate the use of value capture to pay for portions of construction, environmental mitigation measures and community enhancements, or a combination of both. See item 3 of the Green Sheet in <b>Chapter 3</b>.</p> <p>The I-375 Improvement Project is included in SEMCOG’s <i>2045 Regional Transportation Plan for Southeast Michigan</i>, Project Number 13286. Design and right-of-way for the Project is included in the <i>Fiscal Year 2020-2023 Transportation Improvement Program for Southeast Michigan</i> Project Number 130035 (SEMCOG, 2021). In September 2020, construction of the Project was removed from the current TIP and proposed for inclusion in the year 2027. SEMCOG adopted its <i>2045 Regional Transportation Plan</i> on March 14, 2019, in conformance with the transportation planning requirements of USC Titles 23 and 49, the CAAA, and related regulations.</p>
<b>Project – Financial Cost</b>	<p>How much will it cost to bring the boulevard up to grade?</p>	<p>The estimated cost of the Project is approximately \$270 million in 2027 dollars. This is a preliminary cost estimate and will continue to be updated throughout the design process. This cost estimate includes the cost to build the boulevard, build the new interchange, and realign I-75. A large portion of the cost of the Project is building the new interchange and realigning I-75. The cost to construct just the boulevard is approximately \$46 million in 2027 dollars.</p>
<b>Project – Financial Cost</b>	<p>Resources for this project are going to waste and could be better spent on maintenance.</p> <p>There is a problem with overbuilt road infrastructure in the Detroit area, resulting in unsustainable maintenance costs and severing neighborhoods with wide roads.</p>	<p>See EA Section 3.1. (Alternatives Screening) on the discussion and screening of the No-Build Alternative. The original freeway and bridges were built in 1950s and are both at the end of their useful life and would need to be rebuilt regardless of which alternative was selected. The Selected Alternative will remove a total of 15 bridges within the study area, as a result this Project removes overbuilt road infrastructure and replaces with at-grade facilities. In addition, the Selected Alternative will remove an existing pump station and improve drainage within the study area, reducing maintenance costs over the life of the infrastructure</p>
<b>Project – Public Involvement</b>	<p>Support of the public engagement process of the project.</p> <p>General support of the stakeholder advisory committee and public involvement.</p>	<p>Public engagement will continue throughout the design and construction phases.</p>



Topic	Comment	Response
<b>Project – Public Involvement</b>	Notice of the public hearing arrived late.	MDOT uses multiple mechanisms to advertise the date and time for public meetings, including sending flyers, publishing the information in the newspaper, and posting on social media. For this Project, 13,300 brochures were mailed out on January 6, 2021, the meetings were published in several newspapers, several news outlets wrote articles, and it was shared on the MDOT social media. In addition, MDOT published 11 legal notices of the public hearing in various newspapers starting on January 5, 2021. See <b>Appendix A</b> of the FONSI for the summary. All public notification requirements were met for the notice of the public hearing. Please consider signing up for the mailing list at <a href="mailto:MDOT-I-375Corridor@michigan.gov">MDOT-I-375Corridor@michigan.gov</a> to get Project notifications e-mailed directly to you.
<b>Project – Public Involvement</b>	Would love to see a robust community engagement with all stakeholders.	The Project team will continue to work closely with stakeholders throughout design and construction. MDOT has added a commitment to form a local advisory committee to develop a community enhancements plan to address historic environmental justice impacts from the original construction of I-375. The community enhancements plan will develop a process to address public comments received from the Environmental Assessment Public Hearing as well as the January 20, 2021, Executive Order on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government. See item 3 of the Green Sheet in <b>Chapter 3</b> .
<b>Project – Public Involvement</b>	Greektown Casino-Hotel is requesting to be included as a stakeholder in all planning phases of the Project to ensure that the I-375 Project proactively addresses our concerns on the front end with respect to design, phasing, and construction	MDOT will add the Greektown Casino-Hotel as a stakeholder to the Local Advisory Committee (LAC).
<b>Project – Public Involvement</b>	It is unclear what project design was chosen.	The description of MDOT's Selected Alternative is found in EA Section 3.2. (Preferred Alternative Description). Following the public availability period and after incorporation of any changes made based on comments received on the EA or at the public hearing, FHWA determines if the EA adequately and accurately discusses the need, environmental issues, and impacts of the Project and if the mitigation measures and community enhancements proposed are appropriate.
<b>Project – Timeline</b>	A 6-year plus timeline is risking what is designed now will not work by the time construction starts. Highway removal needs to happen as soon as possible and should be a top MDOT (Michigan Department of Transportation) priority. Would like to see a shorter construction period.	Currently, the Project is planned to start construction in spring 2027. MDOT will continue to evaluate opportunities to perform the Project earlier. The Project team will work closely with stakeholders throughout design and construction.  During the design phase of the Project, MDOT will develop several maintenance of traffic (MOT) concepts to determine the time of construction for each concept. There will be stakeholder engagement to present those concepts and provide the trade-offs between for a shorter construction period versus the amount of access to businesses and workspace provided to the contractor.
<b>Project – Timeline</b>	What are the stages of the project?	Upon completion of the NEPA process, MDOT will begin the design of the Selected Alternative, with a target of completing early design in 2023. The Project is scheduled to start construction in spring 2027, however, MDOT will continue to evaluate opportunities to construct the Project earlier. See EA Chapter 6 (Next Steps) for more information.  See response above regarding construction stages of the Project, which will be determined during the design of the Project.
<b>Safety – Nonmotorized</b>	How does this project prioritize the safety of pedestrians and cyclists? Support the current proposal as long as bicycle and pedestrian access and safety are provided.  The current proposal is still too auto centric. The replacement for I-375 needs to prioritize pedestrian access and safety.	EA Section 4.3. (Nonmotorized Safety and Vehicular Safety) details how the Selected Alternative affects nonmotorized safety. The Selected Alternative will increase sidewalk widths, provide dedicated cycle tracks, provide pedestrian countdown signals, install pedestrian refuge islands, and will implement no-turn-on-red for westbound approaches at the boulevard. The Project Mitigation and Community Enhancements Summary (Green Sheet), item 2. (Nonmotorized Safety and Vehicular Safety) of the Green Sheet in <b>Chapter 3</b> indicates that MDOT will create these new pedestrian and bicycle facilities in the corridor.

Topic	Comment	Response
<b>Safety – Nonmotorized</b>	<p>Comments addressed nonmotorized safety concerns that include:</p> <ul style="list-style-type: none"><li>• The bike lane ending at I-75 is dangerous</li><li>• The boulevard along the Blue Cross Blue Shield property is not pedestrian friendly</li><li>• Gratiot is too wide and should consider safety measures such as protected crosswalks, curb bump outs, and a reduction of lanes</li><li>• It will be challenging to cross over 9 lanes of traffic into downtown</li><li>• Concerned the wideness of the boulevard presents safety issues for families and seniors when crossing the street</li><li>• Resident and pedestrian safety will be decreased for those walking to Eastern Market. There will not be a way to cross the new boulevard</li></ul>	<p>EA Section 3.2. (Preferred Alternative Description) details that the cycle track along the boulevard ends at Montcalm Street and not I-75. Pedestrians are not expected to cross at the Blue Cross Blue Shield garage; however, this comment will be considered during the design phase and could be incorporated. In addition, Gratiot Avenue will have pedestrian refuge islands installed at the intersections of the new local connector and the Jay Street/Montcalm Street Intersection. There will be signalized intersections with pedestrian countdown signals at the intersection of Gratiot Avenue at the new local connector and at Gratiot Avenue and the Jay Street/Montcalm Street intersection. EA Section 4.3. (Nonmotorized Safety and Vehicular Safety) details how the Selected Alternative affects nonmotorized safety.</p>
<b>Safety – Nonmotorized</b>	<p>Suggestions to improve nonmotorized safety included:</p> <ul style="list-style-type: none"><li>• North-south protected bicycle lanes painted green</li><li>• Improved pedestrian pathways and signals</li><li>• Wider bike lane and separate it from traffic</li><li>• Traffic calming</li><li>• All right turns across cycle tracks should have protected phasing to reduce vehicle-bicyclist conflicts. Two-lane turns across crosswalks should also employ protected phasing to reduce vehicle-pedestrian conflicts.</li></ul>	<p>EA Section 4.3. (Nonmotorized Safety and Vehicular Safety) details how the Selected Alternative affects nonmotorized safety. MDOT will follow the Michigan Manual of Uniform Traffic Control Devices (MMUTCD) on the design of the cycle track. The Project Mitigation and Community Enhancements Summary (Green Sheet)), item 2. (Nonmotorized Safety and Vehicular Safety) of the Green Sheet in <b>Chapter 3</b> indicates that MDOT will use BMPs to calm traffic and slow vehicles as they approach the boulevard.</p> <p>No-turn-on-red will be implemented for westbound approaches along the boulevard to improve safety for nonmotorized users. Protected left-turn phasing will also be implemented for southbound approaches at the boulevard to improve safety for nonmotorized users.</p>
<b>Safety – Nonmotorized</b>	<p>Do the current design guidelines guarantee the safety of nonmotorized users?</p> <p>A 160-foot-wide boulevard with ~100' of traffic lanes will put hundreds of pedestrians and cyclists at risk of losing life or limb every single day, and this risk will be even greater for residents who use wheelchairs or other mobility assisted devices.</p> <p>Enhance safety for pedestrians and cyclist traffic crossing the boulevard on east-west streets and arterials by adding curb extensions, textured pavement in crosswalks, and removing vehicle slip lanes.</p>	<p>EA Section 4.3. (Nonmotorized Safety and Vehicular Safety) details how the Selected Alternative affects nonmotorized safety. The Selected Alternative will increase sidewalk widths, provide dedicated cycle tracks, provide pedestrian countdown signals, install pedestrian refuge islands, and will implement no-turn-on-red for westbound approaches at the boulevard. See response directly above.</p> <p>MDOT will implement curb extensions where feasible and follow MMUTCD guidelines for crosswalks.</p>
<b>Safety – People with Disabilities</b>	<p>There could be improvements to the design to better accommodate for people with disabilities.</p> <p>The number of vehicle lanes in the project design presents an unsafe pedestrian crossing, especially for seniors and people with disabilities.</p> <p>Did MDOT map or analyze people with disabilities with the Project?</p> <p>Project has absence of pedestrian access lights, which is a safety concern.</p> <p>Design should be disability friendly.</p>	<p>EA Section 4.5.6.2. (Title VI) details that persons with one or more disabilities account for 25% of the total population is the socioeconomic study area. By comparison, 20% of Detroit's population and 16% of Wayne County's population have at least one disability. EA Appendix B (Social and Economic Factors) shows disabled population by census tract. As part of the Project, all pedestrian street crossings, including sidewalk ramps and the crosswalk on the bridge over I-75 will be upgraded to meet ADA standards, see EA Section 4.20 (Project Mitigation and Community Enhancements Summary (Green Sheet)).</p> <p>All signalized intersections will be equipped with pedestrian countdown signals with crossings in all directions, as described in EA Section 4.3.1 (Pedestrian Safety).</p>
<b>Safety – Vehicular Transit</b>	<p>Project will result in increase in neighborhood traffic, and more accidents consequently.</p>	<p>MDOT does not expect an increase in neighborhood traffic from the Selected Alternative due to increased connections and accessibility along the boulevard and the freeway. EA Section 4.3.3. (Vehicular Safety) details that there may be an increase in crashes due to the Project simply because of the additional conflict points associated with changing the freeway to an at-grade boulevard. Continued review of safety measures to reduce crashes will be conducted throughout the design phase.</p>

Topic	Comment	Response
<b>Safety – Vehicular Transit</b>	Institute a speed limit no greater than 35 miles per hour (mph), especially south of Gratiot Avenue  Reduce speed to 25 mph along the boulevard.	The boulevard will be signed as 35 mph south of the I-75/I-375 Interchange. South of Jefferson Avenue, it is expected that the boulevard will be signed as 25 mph as this section will be under the jurisdiction of the city of Detroit. This is described in EA Section 4.3.3 (Vehicular Safety). MDOT will also review and implement Best Management Practices or BMPs to reduce speeds along the corridor during the design phase.
<b>Transit – Bus</b>	Would like to see a dedicated bus lane.  Would like to see dedicated bus lanes instead of more vehicular lanes.  Will there be future bus lines or Q-Line extensions with level grade to step on-off buses/trolleys?  Is there a plan for providing buses along this route?  Will there be sheltered bus stops on the boulevard?	This Project does not include dedicated bus lanes, extensions of the streetcar, or changes to bus shelters. The Selected Alternative includes new at-grade local street crossings that will improve pedestrian and bicycle access to transit services, wider sidewalks, and cycle track facilities, which improve access for SMART and DDOT riders. In addition, the Selected Alternative will provide the infrastructure to support expanded transit service to the riverfront, enhanced routing along East Jefferson Avenue, improved bus stop placement, and new routes with more direct east-west connections and access to the Central Business District. All these types of future transit service decisions will be made by DDOT or SMART in coordination with MDOT. The boulevard cross section does not preclude re-dedicating lanes for transit in the future, which could be identified in future studies.
<b>Transit – Nonmotorized</b>	Comments regarding support for nonmotorized facilities: <ul style="list-style-type: none"><li>• Support the large sidewalk and two-way protected bike lane</li><li>• Supports bike lanes and expanded complete streets practices</li></ul>	Comments recorded.
<b>Transit – Nonmotorized</b>	Suggestions for alternative or additional nonmotorized facilities include: <ul style="list-style-type: none"><li>• Grade-separated bike lanes</li><li>• More space for bikes</li><li>• Bike signals</li><li>• Wider, double cycle track</li><li>• Cyclist-only lanes</li><li>• Bike lanes on both sides of the boulevard</li><li>• Consider scooter traffic</li><li>• More bike and pedestrian lanes</li><li>• More crossing infrastructure</li><li>• Maximizing bike lanes to prioritize walkability between Downtown, Eastern Market, and Lafayette Park.</li></ul>	EA Section 3.2. (Preferred Alternative Description) details that there will be a dedicated cycle track located along the boulevard from Atwater Street to Montcalm Street. There will also a dedicated cycle track along Montcalm Street from Brush Street to the Dequindre Cut Greenway. The Selected Alternative will also incorporate the Lafayette Avenue bike lanes crossing the boulevard. The addition of bike signals will be determined during the design phase of the Project.
<b>Transit – Nonmotorized</b>	How does this project emphasize community livability and walkability?	The Selected Alternative will improve nonmotorized facilities, including a two-way cycle track connecting the Riverfront to the Montcalm Street extension. The Montcalm Street extension includes a two-way cycle track connection from Brush Street to the Dequindre Cut. There will be pedestrian count-down signals located at each intersection. No-turn-on-red will be implemented for westbound approaches at the boulevard to improve the safety for the two-way cycle track along the east side of the boulevard. The existing Lafayette Avenue bike lanes will be connected across the boulevard. Overall, the Selected Alternative provides more direct connections within and across the corridor and will encourage slower speeds and more nonmotorized accessibility.
<b>Transit – Nonmotorized</b>	Alternatives 4 and 5 would make the walk or bike between downtown and Eastern Market more attractive.	EA Section 3.1. (Alternatives Screening) describes the process of evaluating all alternatives considered for the Project. The Selected Alternative best balances the needs of all users within the corridor and best met the purpose and need as described in EA Chapter 2. (Purpose and Need).

Topic	Comment	Response
<b>Transit – Nonmotorized</b>	The proposal should consider the needs of pedestrians more. I was hoping that this new design would make it easier to walk from my apartment in Lafayette Park to Greektown, but it doesn't seem like this will be the case.	<p>EA Section 3.1. (Alternatives Screening) describes the process of evaluating all alternatives considered for the Project. The Selected Alternative best balances the needs of all users within the corridor and best met the purpose and need as described in EA Chapter 2. (Purpose and Need). The Selected Alternative will improve the accessibility both along and across the corridor, including providing more nonmotorized connections to/from Lafayette Park, Brush Park, the Events Area, and Eastern Market. Sidewalks will be widened along the corridor. MDOT will include pedestrian refuge islands and/or features within the median designed to provide rest and safe refuge, allowing pedestrians to focus on one direction of traffic at a time as they cross, and giving them a place to rest and wait for an adequate gap before finishing the second phase of a crossing.</p> <p>During the design phase, MDOT will consider reducing the lane widths of the boulevard to reduce the amount of time to cross the boulevard. MDOT will continue to research during the design phase features that may include seating and BMPs that could increase visibility of the crosswalks by motorists and visibility of oncoming traffic by pedestrians.</p> <p>In response to comments received, one year after the Project is constructed and open to traffic, MDOT will conduct an analysis to evaluate the operations of all modes of transportation along the boulevard. Pedestrian crossing times will be reviewed, including whether a one-stage pedestrian crossing would be feasible during any part of the day.</p>
<b>Transit – Nonmotorized</b>	It is already challenging to walk across Gratiot. Don't need another barrier to getting to the Eastern Market.	The Selected Alternative will provide several additional points of connectivity to Eastern Market, including the Montcalm Street extension as well as safer fully signalized pedestrian crossings at Gratiot Avenue at the new local connector and at Jay Street.
<b>Transit – Nonmotorized</b>	<p>Monroe Street, St. Antoine Street, and Brush Street should all be considered priority corridors for pedestrian-focused infrastructure. High priority intersections include Gratiot Avenue and Randolph Street, Gratiot Avenue and Brush Street, Randolph Street and Monroe Street, and connecting St. Antoine across Gratiot Avenue, as this crossing will be significantly impacted by traffic movements once the I-375 boulevard design is implemented.</p> <p>The Greektown Neighborhood Framework Vision calls for stronger pedestrian design for key corridors, including Monroe Street, St. Antoine Street, Brush Street, Beaubien Street, Randolph Street, and Gratiot Avenue. A complete streetscape improvement program for the length of Monroe Street from Randolph Street to I-375 is central to that success. The extension of this treatment to the proposed Boulevard upon its completion would be necessary for neighborhood connection and integration. All these elements, and more, function in concert with the proposed I-375 Improvement Project and thus must be considered with any design and construction planning.</p>	The Selected Alternative will increase sidewalk widths, provide dedicated cycle tracks, provide pedestrian countdown signals, install pedestrian refuge islands, and will implement no-turn-on-red for westbound approaches at the boulevard, as detailed in EA Section 4.2. (Nonmotorized Operations and Vehicular Operations). EA Section 4.20. (Project Mitigation and Community Enhancements Summary (Green Sheet)) within the Community Enhancements section details that MDOT will continue to work on aesthetics design and coordinate with the community and the city of Detroit to develop a guide for the study area.
<b>Transit – Parking</b>	Road seems wide and plans for vehicle parking are unclear.	<p>See responses under Design – Number of Vehicular Travel Lanes.</p> <p>Due to adjustments for safety and operations, the Selected Alternative impacts on-street parking as well as private parking lots within the Project area, including the Eastern Market area. The Selected Alternative will create new access between the Event Area (stadiums and theater district) and Eastern Market, opening up additional parking opportunities. The new connection at Montcalm Street includes sidewalks and a cycle track that will allow visitors to park and then use the nonmotorized facilities to reach their destination. See EA Section 4.4. (Parking).</p>
<b>Transit – Parking</b>	Project would be more functional with a lane repurposed for biking or parking.	See responses under Design – Number of Vehicular Travel Lanes. The Selected Alternative will improve nonmotorized facilities, including a two-way cycle track connecting the Riverfront to the Montcalm Street extension. The Montcalm Street extension includes a two-way cycle track connection from Brush Street to the Dequindre Cut.
<b>Transit – Parking</b>	<p>Would like to see street parking.</p> <p>Include metered street parking and loading zones for delivery and ride hailing services.</p>	EA Chapter 2. (Purpose and Need) did not include the addition of more street parking and was not one of the stated goals for the Project. There is some on-street parking that exists within the study area mainly along the service drives. EA Section 4.4. (Parking) does indicate that there will be an impact to the number of parking spaces within the study area. There will be the addition of on-street parking along the boulevard south of Jefferson Avenue.



Topic	Comment	Response
Transit – Parking	Would like to see removal of on-street parking.	See previous response. EA Section 4.4. (Parking) indicates that there will be some removal of on-street parking in order to minimize impacts to right-of-way. On-street parking has been maintained in other areas where future land use is expected to support on-street parking, such as along the boulevard south of Jefferson Avenue and within Eastern Market.
Transit – Parking	Would like to see parking lanes north of the boulevard as the land will be used for future redevelopment.	The Project does not include on-street parking on boulevard north of Jefferson Avenue to improve traffic safety and operations of the roadway. There will be the addition of on-street parking along the boulevard south of Jefferson Avenue.
Transit – Parking	The new boulevard should include deterrents for non-neighborhood residents from parking on the east side of I-375.	The city of Detroit is responsible for parking enforcement within the study area and the Project cannot include deterrents for an issue that may or may not occur. The city of Detroit enables and enforces parking restrictions. MDOT will continue to work with the city of Detroit before and during construction if parking issues arise.
Transit – Traffic Flow	A delicate balance must be struck between the need for vehicular traffic flow timing, capacity needs, and nonmotorized travel connectivity, as well as economic impacts.	The Selected Alternative as detailed in EA Section 3.1.5. (Refinements to Practical Alternative 5) best balanced these competing factors and found to be the best alternative.
Transit – Traffic Flow	<p>Reduce the road speed.</p> <p>People will still drive at near-highway speeds on this proposed roadway. Need more attention paid towards traffic calming and speed management.</p> <p>Roadways with more than 4 lanes tend to lead to an increase in speeding.</p> <p>Wide roadways are known to encourage speeding.</p> <p>The project should include BMP infrastructure design that clearly informs motorists of the transition from freeway to urban street. Motorists often treat existing Detroit service drives as freeway extensions due to their high design speeds, which is dangerous for bicyclists and pedestrians.</p>	The posted speed limit for the boulevard will be 35 mph. BMPs will be used in the high-speed to low-speed transition area to improve safety. A series of signals placed prior to the boulevard is proposed as an effective measure in order to help reduce speeds. Other potential measures under consideration include creating a gateway appearance prior to the transition and utilizing traffic calming measures to increase driver awareness of the speed change. In response to comments, MDOT will conduct a speed study after the Project is constructed and open to traffic to determine an appropriate speed limit along the corridor. EA Section 4.20. (Project Mitigation and Community Enhancements Summary (Green Sheet)) indicates that MDOT will continue to work with the community and the city of Detroit on aesthetics to develop a guide.
Transit – Traffic Flow	<p>What is the plan for football and baseball traffic?</p> <p>What are the traffic flow benefits of converting the freeway to a grade-level boulevard? Will the conversion create more issues during special events?</p>	With the Selected Alternative, special event traffic will have new ways to enter and exit the area, including the southbound I-75 service drive exit, Brush Street on-ramp, gated access to the northbound boulevard for large event egress at the Ford Field garage, and the Montcalm Street extension. The Project Mitigation and Community Enhancements Summary (Green Sheet)), item 2. (Nonmotorized Safety and Vehicular Safety) in <b>Chapter 3</b> indicates that MDOT will conduct a special event analysis to further refine intersection operations related to event traffic. This includes the Project limits along the new boulevard from Clinton Street north to I-75 and the Gratiot Avenue/Madison Avenue/St Antoine intersection to the west. Meetings will be held with the Detroit Police Department and event venues to develop a special event traffic management plan for events large and small.
Transit – Traffic Flow	The plan will cause the Windsor to Detroit tunnel to back up and there may be a public push to close it in the future. I sent a proposal for an aerial tram across the Detroit River to the governor of Michigan. The tram would land on new state land that is freed up. I left my proposal at the public meeting and would like some input.	<p>A detailed traffic analysis was conducted, which included the intersection with the Detroit Windsor Tunnel, which can be found in the <i>I-375 Traffic Technical Memorandum</i> on the Project website. The Project will not cause any additional impacts to the Detroit Windsor Tunnel and no changes to traffic entering or leaving the tunnel are expected.</p> <p>The aerial tram proposal delivered at the public hearing does not adequately meet the purpose and need of the Project as defined in EA Chapter 2. The purpose and need do not include providing an additional connection between the United States and Canada. In addition, the proposed land is outside of the Project area, which is defined as I-75 south of Mack Avenue to the Detroit Riverfront. Therefore, the proposal will not be considered for this Project.</p>



Topic	Comment	Response
Transit – Traffic Flow	Allow left-turns from northbound Gratiot onto M-375.	A traffic analysis was conducted during the refinements of Practical Alternative 5 and found that allowing left-turns at the intersection of Gratiot Avenue at the boulevard would either cause severe congestion with back-ups onto I-75 or would require additional lanes of traffic on the boulevard, which was not desirable by the city of Detroit. As such, left turns are restricted at the intersection of Gratiot Avenue and the boulevard to improve traffic operations. MDOT will conduct a special event analysis to further refine intersection operations related to event traffic. This includes the intersection of Gratiot Avenue and the boulevard.
Transit – Traffic Flow	<p>The Detroit Windsor Tunnel is supportive of the project. We'd like MDOT to share any information on the current and projected traffic volumes at Jefferson Avenue and Randolph Street as the ingress and egress point at Detroit Windsor Tunnel is based on your analysis and study.</p> <p>Have you determined the effect to the M-10 freeway in terms of speed, volume, and level of service? Will this reduce or increase commute times? What will the effect be on M-10 and Jefferson Avenue at Randolph Street?</p> <p>Did you evaluate the impact to traffic coming to the tunnel with a seven minute increase in travel time?</p> <p>Did your study take into account this seven minute increase in delay in the afternoon using the southbound boulevard?</p> <p>A negative impact on the Detroit Windsor Tunnel traffic will have an effect on the revenue share that the tunnel is required to make under its concession agreement with the city of Detroit. Has that been taken into consideration?</p> <p>Is there any concern that there will be an impactful change of the greenhouse gas emissions in the downtown area during peak hours? In particular at the Jefferson Avenue and Randolph Street area.</p>	<p>A detailed traffic analysis was conducted, which included the intersection with the Detroit Windsor Tunnel, which can be found in the <i>I-375 Traffic Technical Memorandum</i> on the Project website. The Project will not cause any additional impacts to the Detroit Windsor Tunnel and no changes to traffic entering or leaving the tunnel are expected. An expanded study area traffic analysis was conducted on roadways that would see an additional 200 vehicles per hour due to the Project. It was found that M-10 may see an increase, however, the analysis found that the Project did not increase congestion. The <i>I-375 Expanded Study Area Analysis Technical Memorandum</i> can be found on the Project website.</p> <p>As indicated in EA Section 4.2.2. (Vehicular), the Project is expected to add some additional travel time but is not expected to have severe congestion. The largest increase in travel time would be along the northbound boulevard from the Detroit Windsor Tunnel to Mack Avenue. This is mainly expected during the AM peak hour due to an increase in delay for eastbound left-turning traffic from Jefferson Avenue to the boulevard. It is not expected that these delays would have a change in traffic volumes to and from the Detroit Windsor Tunnel. The Selected Alternative provides additional access points to and from the Detroit Windsor Tunnel that doesn't currently exist.</p> <p>The air quality analysis takes into account the entire Project area and overall increases in traffic volumes. While there may be an increase in delays at the Jefferson Avenue at boulevard intersection, there are significant reductions in delay along I-75 with the Selected Alternative. Based on this analysis, the Project does not have an impact to air quality. Based on the analyses completed for the criteria pollutants required to be analyzed for the Project, there is no impact to air quality or violation of the National Ambient Air Quality Standards (NAAQS) anticipated. Greenhouse gas emissions are not required to be analyzed by MDOT or FHWA.</p>

### 3. Project Mitigation and Community Enhancements Summary (Green Sheet)

#### **Project Mitigation and Community Enhancements Summary “Green Sheet” For the Selected Alternative**

**March 2022**

#### **Finding of No Significant Impact (FONSI)**

This Green Sheet contains the Project-specific mitigation measures that address project impacts, as well as community enhancements to acknowledge the historic social and environmental effects of the original construction of I-375. The Project mitigation and additional community enhancements will be tracked and sign-off on the mitigation and community enhancements will occur as the Project progresses through the various phases: design, right-of-way (ROW) acquisition, construction, and maintenance.

#### **1. Public Transportation**

- a. Early coordination with transit agencies will take place during the development of maintenance of traffic plans to ensure access to transit stops will be maintained during construction. Coordination with transit agencies will be ongoing during the pre-construction and construction phases to ensure that transit riders are given adequate notice of any changes and that any adjustments in transit stops or routes are addressed appropriately.

#### **2. Nonmotorized Safety and Vehicular Safety**

- a. *Pedestrian and Bicycle Safety* – The Selected Alternative will create new pedestrian and bicycle facilities in the corridor. The sidewalks along the boulevard will be between 10 feet and 20 feet on the west side of the boulevard and 10 feet on the east side of the boulevard. Cycle tracks will be provided north and south, connecting to existing and planned nonmotorized infrastructure.

All pedestrian street crossings, including sidewalk ramps and the crosswalk on the bridge over I-75 will be upgraded to meet Americans with Disabilities Act (ADA) standards. Best Management Practices (BMPs) for urban and nonmotorized design will be utilized to provide vehicular and nonmotorized traffic safety, such as the use of protected left-turn signal phases at signalized intersections, enhanced signing, and pavement marking. Since pedestrians are most vulnerable while crossing the street, MDOT will evaluate and incorporate feasible, innovative strategies and countermeasures at pedestrian crosswalks to effectively promote safe passage.

Due to longer pedestrian crossing times, MDOT will include pedestrian islands and/or features within the median designed to provide rest and safe refuge, allowing pedestrians to focus on one direction of traffic at a time as they cross, and giving them a place to rest and wait for an adequate gap before finishing the second phase of a crossing. Such features may include seating and will include BMPs that increase visibility of the crosswalks by motorists and visibility of oncoming traffic by pedestrians. MDOT will use

Performance-Based Practical Design<sup>3</sup> (PBPD), which will consider reducing lane widths along the corridor to reduce the amount of crossing distance as well as other techniques to deliver maximum value through efficient design. One year after the Project is constructed and open to traffic, MDOT will conduct an analysis to evaluate the operations of all modes of transportation along the boulevard. Pedestrian crossing times will be reviewed, including whether a one-stage pedestrian crossing would be feasible during any part of the day.

- b. *Vehicle Safety* – The transition from a freeway section to a boulevard surface street section has been identified as a safety focus. This area will be designed to slow vehicles as they approach the boulevard section. BMPs will be used in this high speed to low-speed transition area to improve safety. Potential measures include creating a gateway appearance prior to the transition and utilizing traffic calming measures to increase driver awareness of the speed change. MDOT will review and implement other BMPs to encourage lower speeds along the corridor south of the interchange.
- c. *Vehicle Operations* – A special event analysis around the Event Area (see **Figure 1**), which includes the Theater District, will be conducted to further refine intersection operations related to event traffic. This includes the Project limits along the boulevard from Clinton Street north to I-75 and the Gratiot Avenue/Madison Avenue/St. Antoine Street intersection to the west. Nonmotorized users will also be considered during the special event analysis.

One year after the Project is constructed and open to traffic, MDOT will conduct an analysis to evaluate the operations of all modes of transportation along the boulevard. MDOT will implement feasible and reasonable measures to optimize operations.

### 3. Social and Economic Environment

- a. *Right-of-Way* – The Project requires 3.24 acres of permanent ROW and 0.87 acres of temporary ROW. The purchase of private property to build the Project will be conducted in accordance with state and federal laws, including the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Uniform Act), as amended. All temporary grading easement areas will be graded and stabilized before the construction completion.

The Project will also result in the creation of excess real property. In accordance with MDOT's *Real Estate Procedure Manual*, Federal Highway Administration (FHWA) approval will be required for any potential release of limited access ROW (LAROW), which was secured using federal funds for transportation purposes during the original freeway construction. Due to the change in highway orientation and operation proposed by this Project, an engineering and operations review will be performed to determine the necessary ROW requirements for the continued safety, operation, and maintenance of the new facility.

Some of the LAROW will be relinquished to the city of Detroit for city street connections. MDOT plans to commit the value of the remaining excess real property to address historical environmental justice (HEJ) impacts and social equity (SE) concerns. See item 3.b. below for more details on the process for implementing this measure. Typically, excess right-of-way is reviewed for disposal after construction of the Selected Alternative. For the unique circumstances of I-375, the following two-phased approach to excess real property disposal will be employed:

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<sup>3</sup> <https://www.fhwa.dot.gov/design/pbpd/>

Phase 1: During the development of the community enhancements plan, see item 3.b., MDOT, will conduct an Engineering Review as set forth in Section 7.3 of MDOT's *Real Estate Procedure Manual* to deem if certain real property located within the existing ROW is no longer necessary for the continued operation, maintenance, and safety of the reconstructed facility and that such disposal would not impair the highway or interfere with the free and safe flow of traffic, in compliance with 23 CFR 710.403 and 710.409 and as set forth in Chapter 7 of MDOT's *Real Estate Procedure Manual*. Disposal of excess real property may take place following the development of the community enhancements plan and before the completion of construction, which would free up real property or proceeds from the sale of said property and can be used to implement community enhancements related to historic environmental justice (HEJ) impacts during design or construction.

Phase 2: Other potential excess LAROW will need to be retained to assure safe and effective operations of the new boulevard configuration for an evaluation period agreed upon by FHWA and following construction, before it could be processed for disposal. In the interim, MDOT will plant grass seed on potential excess real property and coordinate maintenance, such as mowing, to maintain the green space while the land is being held.

- b. *Community Enhancements to Address I-375 HEJ Impacts* – MDOT is committed to taking actions to address HEJ impacts from the original construction of I-375. The following paragraphs outline a process to create a new community-based local advisory committee to advise MDOT on preparation and implementation of a community enhancements plan, land use framework plan, and aesthetic design guidelines. A full summary describing the guiding principles, roles and responsibilities, milestones, and measures of success to develop and implement community enhancements to address social equity and HEJ can be found in **Appendix D**.

MDOT will facilitate the formation of a new community-based local advisory committee focused on the recognition of the former predominantly Black businesses and residential neighborhoods of Paradise Valley and Black Bottom. This local advisory committee will be tasked with providing meaningful input and ideas on final design elements as well as ways to repurpose or leverage excess real property remaining after Project construction (see item 3.a.) Ideas proposed by the local advisory committee should be implementable, in that they are legal, feasible, and reasonable. MDOT will provide engineering and public involvement staff as needed to facilitate the development of ideas, however the intent of MDOT involvement will be to support community-based decision-making. The local advisory committee will be formed during early design so that their input can be incorporated into the Project.

The local advisory committee will include the city of Detroit and other local stakeholders. Examples of potential stakeholders, all from local groups and the local community, include neighborhood organizations, business organizations, clergy, historical societies, historians, governmental agencies, representatives of the surviving and contemporary jazz community, musical foundations, media sources, climate justice organizations, and racial justice organizations.

The local advisory committee will also provide ongoing guidance during the Project design and construction process to address details related to community place-making, minimizing maintenance of traffic impacts on the community during construction, and improving pedestrian and nonmotorized multi-modal access.

The local advisory committee will be expected to maintain a transparent and inclusive process that gathers input from the broader community, and MDOT shall post local

advisory committee meeting minutes on the Project website ([www.michigan.gov/i375study](http://www.michigan.gov/i375study)).

See FONSI **Appendix D** for details of the local advisory committee's roles and responsibilities. To summarize, the local advisory committee will guide the accomplishment of the following:

- i. Lead the development of a community enhancements plan based upon this FONSI Green Sheet and FONSI **Appendix D** that acknowledges the role of government-sponsored urban renewal efforts that resulted in the removal of the Black Bottom and Paradise Valley neighborhoods. The community enhancements plan will address approximately 30 HEJ public comments received from the Environmental Assessment Public Hearing and will be prepared in the spirit of the January 20, 2021, Presidential Executive Order on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government.
  - A. The plan may include enhancements such as historic markers or memorials, affordable housing, incubating, and encouraging minority-owned businesses, or other actions relevant to addressing HEJ.
  - B. The plan will identify potential Project partners that have the expertise and ability to implement and administer enhancements in the community enhancements plan and will include a proposed implementation schedule.
- ii. Assist MDOT and the city of Detroit in the development of a land use framework plan that provides land use and zoning recommendations for the potential excess real property from the Project. The potential excess real property would be vetted and processed in accordance with MDOT's *Real Estate Procedure Manual*, see item 3.a., above.
- iii. Assist MDOT in development of aesthetic design guidelines as part of the design stage of the Project.

Funding for the immediate effort of assembling the local advisory committee and supporting their work shall be part of the Project cost. Funding for any activities following land disposition shall come from the sale of excess real property. During design, MDOT will evaluate the use of value capture to pay for portions of construction, environmental mitigation measures and community enhancements, or a combination of both. Value capture is a strategy to recover a portion of public transportation investments that results in increased land values. See also item 3.a., regarding use of funds from sale of excess real property. MDOT will assist the local advisory committee in establishing partnerships with FHWA, the city of Detroit, private businesses, and philanthropic entities to leverage other resources to implement desired programs and activities.

An executive board consisting of local and state agency representatives will be formed to approve the land disposition activities related to the community enhancement plan and land use framework plan. For more information on the roles and responsibilities of the executive board, see **Appendix D**.

- c. *Unauthorized Occupants* – A Special Provision for “Relocation and Site Cleanup” will be included in the final design plans to establish procedures for relocating unauthorized occupants off the Project site. The contractor will coordinate with the Detroit Housing and Revitalization Department, Director of Homelessness Solutions who will coordinate services and relocation plans with Detroit Homeless Continuum of Care partners and the local police authority in advance of construction. The Detroit Housing and Revitalization



Department, Homelessness Solutions Team will notify unauthorized occupants in advance of relocation to allow them to plan for alternate housing and ensure they clear their belongings before construction begins. All Federal assistance for unauthorized occupants will be handled in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act. During final design, MDOT will work with the Detroit Housing and Revitalization Department, Homelessness Solutions Team for regular meetings about the Project area and outreach and connections to services for occupants of encampments or other unauthorized occupants.

- d. *Small Business Enterprise Program* – MDOT will develop a Small Business Enterprise (SBE) Program during the design and construction of the Project. The SBE Program will be designed to maximize Small Business participation on the Project in the areas of Design and Construction Engineering & Inspection (CEI) professional services. The goal will be for small business to gain experience necessary to sustain and/or obtain MDOT Service Prequalification. Furthermore, the MDOT Mentor Protégé Program (MPP) will be utilized during design of the Project to provide opportunities for Small Business's to obtain service prequalification working directly under an experienced prequalified service provider with MDOT.

#### **4. Cultural Environment**

- a. *Historic Resources* – MDOT will conduct the following actions during final design when proposed I-375 roadwork and utility relocations limits are identified:
  - i. Between Jefferson Avenue to Atwater Street along Schweizer Place, review and determine if archaeological surveys and/or data recovery are needed or if monitoring during construction will be required.
  - ii. For both identified cemeteries, sites 20WN284 and 20WN331, review and determine if archaeological monitoring will be required during construction. If MDOT discovers an inadvertent find, it will stop all work in the area and begin an investigation. If needed, MDOT will complete the appropriate mitigation measures before resuming ground-disturbing activities.
  - iii. Access to Holy Family Roman Catholic Church and Mrs. Solomon Sibley House will be maintained during construction.
  - iv. Monitor construction near the southern edge of the Eastern Market Historic District should work extend beyond the curb line.

#### **5. Section 4(f)**

- a. *Historic Resources (Section 4(f))* - Based on SHPO's concurrence with the "No Adverse Effect" finding, the Project will have a temporary occupancy for the Holy Family Roman Catholic Church property, the Mrs. Solomon Sibley House property, and the Eastern Market Historic District. Access to Holy Family Roman Catholic Church property, Mrs. Solomon Sibley House property, and the southern edge of the Eastern Market Historic District will be maintained during construction.

For Historic Resources (Section 4(f)):

- i. Access will be maintained to the properties during and after construction.
- ii. The land will be restored to as good, or better condition as prior to the project.

- b. *Recreational Properties (Section 4(f))* – The following properties have been determined to qualify as Section 4(f) properties with a temporary occupancy.
  - i. *Dequindre Cut Greenway* – The construction and maintenance of traffic plans will be designed in consultation with and approved by a representative staff member from the Detroit Riverfront Conservancy. Mitigation listed below will commence in the Project’s construction phase. The Dequindre Cut Greenway will require a temporary detour for nonmotorized traffic during construction of the Gratiot Avenue bridge replacement.
  - ii. *RiverWalk/Iron Belle Trail* – The construction and maintenance of traffic plans will be designed in consultation with and be approved by the Detroit Riverfront Conservancy. Mitigation will commence in the Project’s construction phase. If any construction is required to maintain the stormwater outfall, which runs underneath the RiverWalk and Iron Belle Trail, MDOT might designate a temporary detour for nonmotorized traffic.

For Recreational Properties (Section 4(f)):

- iii. The contractor will not be allowed to store or stage on recreational property other than within the approved consent to grade and consent to construct sidewalk areas and while actively reconstructing the Trail surfaces.
- iv. Tree removals on the recreational properties will be replaced at a 2:1 ratio, and coordination will occur with the city of Detroit regarding the tree types and locations.
- v. All trail pedestrian traffic will be maintained at all times via the existing trails, construction of temporary trails, or pedestrian detours.
- vi. The pedestrian detour routes will be signed.
- vii. Longitudinal pedestrian barrier will be used in areas where the trail is crossing through active construction areas.
- viii. Protective fencing will be provided during construction.
- ix. When construction has been completed, recreational properties will be returned to as good, or better condition.

## **6. Hazardous/Contaminated Material**

- a. *Contaminated Sites* – A Project Area Contamination Survey (PACS) identified sites with potential soil and/or groundwater contamination and recommended more detailed study through a Phase II Preliminary Site Investigation (PSI). See EA Section 4.11 (Contaminated Materials). MDOT will complete the recommended Phase II PSI for sites within the Project footprint during the Project’s preliminary design. If necessary, MDOT will perform additional physical investigations to determine the nature and extent of existing contamination and determine a strategy for addressing it. The results of the PSI, physical investigations, and applicable requirements for material handling and disposal and worker protection will be included in the final design plans. The Special Provision for “Non-Hazardous Contaminated Material Handling and Disposal” will be included in the Project proposal and a miscellaneous quantity will be set up.

If fill material is needed from outside sources, MDOT will require testing to ensure it conforms with applicable Michigan Department of Environment, Great Lakes, and Energy (EGLE) and U.S. Environmental Protection Agency (EPA) requirements for contaminants.

## 7. Natural Environment

- a. *Vegetation* – During the Project’s design, the existing natural and ornamental vegetative cover, including trees, will be preserved where possible. If trees must be removed from the front of a residence, the property owner will be given appropriate notice and offered replacement trees. A landscape guide will be developed with public input during the design phase of the Project and will emphasize native species and not include invasive species.
- b. *Migratory Birds* – When swallows or other migratory birds are present, nest removal will be conducted in accordance with the provisions of the Migratory Bird Treaty Act. A Special Provision for “Migratory Birds Protection” will be included in the final design plans.
- c. *Water Quality* – The Project will include BMPs to protect water quality, preserve water resources and minimize the overall impact on aquatic resources. BMPs will meet the conditions of MDOT’s National Pollution and Discharge Elimination System (NPDES) Permit Requirement. The selection and design of the BMPs will be determined during the Project’s final design in coordination with the city of Detroit Water and Sewerage Department and the Great Lakes Water Authority and will meet the requirements of MDOT’s Road Design Manual, Drainage Manual, and Standard Specifications for Construction.
  - i. If construction work is needed below floodplain or the ordinary high-water mark (OHWM), permits will be necessary from EGLE and the U.S. Army Corps of Engineers (USACE). All proposed design work will be coordinated with EGLE and the USACE as needed, to secure the necessary environmental permits.
  - ii. MDOT will coordinate with the Detroit Water and Sewerage Department to identify measures to incorporate green infrastructure into the Project’s design and to separate stormwater from existing combined sewers in the Project area.
- d. *Stormwater Management* – As a part of this Project, MDOT will work to reduce flooding risks. The construction of a new independent stormwater outfall or utilizing existing combined sewer overflow (CSO) outfall sewers to the Detroit River will use BMPs to greatly reduce the overall volume conveyed to the existing CSO system and the city’s Wastewater Treatment Plant. Coordination with the Detroit Water and Sewerage Department (DWSD) will continue during plan development and MDOT will prepare a final report documenting the volume reduction with distribution to DWSD and EGLE.

## 8. Utilities

- a. Prior to completing design, MDOT will coordinate with owners of all known utilities to determine if their facilities will require modification, protection, or relocation to accommodate the proposed Project.

MDOT will continue coordination with utility providers prior to and during construction to avoid and minimize service disruptions. Utility owners will be responsible for relocating utility infrastructure prior to and during construction.

## 9. Construction

MDOT will follow *MDOT Standard Specifications for Construction* for mitigation regarding maintenance of traffic, soil erosion and sedimentation control, construction air quality, construction noise, and construction vibration.

- a. *Maintenance of Traffic* – During the Project’s design phase, MDOT will develop a detailed traffic management plan that will outline how the Project will be built and how traffic will be

managed during construction, including detour routes for any closures. To the greatest extent possible, access to the service drives and adjacent properties will be maintained throughout construction, with limited short-term closures as needed to reconstruct private driveways. All temporary vehicle, pedestrian, or nonmotorized detours will be signed, and notices will be given to local media prior to the start of the detour.

- b. *Emergency Services* - Local and state police, fire departments, ambulance services, school districts and transit providers will be notified in advance of construction activities to minimize disruption of services. Traffic signs, notices published in the local media, and a Project website will alert the public early about major construction activities that could disrupt the community.
- c. *Bus Transit (DDOT and SMART)* – Temporary or permanent bus stop relocation will be coordinated with the Detroit Department of Transportation (DDOT) and the Suburban Mobility Authority for Regional Transit (SMART). Route detours will use local streets and will be coordinated between MDOT, city of Detroit, and the transit providers.
- d. *Soil and Erosion Control* – Earth disturbance activities associated with this Project will require a National Pollutant Discharge Elimination System Permit (NPDES) from the Michigan EGLE to discharge stormwater from the construction site. Both the MDOT Metro Region Soils Unit and Construction Field Services Division will review the soil erosion and sedimentation control measures developed for the Project for compliance with Part 91 of the Soil Erosion and Sedimentation Control, of the Michigan Natural Resources Environmental Protection Act, 1994 Public Act 451 as amended. Once approved, Construction Field Services will apply for the NPDES permit. Construction sites must be inspected every seven days or within 24 hours, including weekend days, regardless of if the contractor is working or not, after a precipitation event that results in a discharge from the site.
- e. *Construction Air Quality* – The Project will be constructed in accordance with MDOT's *2020 Standard Specifications for Construction* provisions for dust control to minimize impacts to air quality during construction.
- f. *Construction Noise* – Construction noise will be minimized by measures such as requiring that construction equipment have mufflers, that portable compressors meet federal noise standards for that equipment, and that portable equipment be placed away from or shielded from sensitive noise receptors to the greatest extent possible. Temporary noise impacts from construction activities will be minimized through compliance with applicable local, state, and federal noise control and ordinance requirements.
- g. *Construction Vibration* – MDOT will develop a vibration monitoring program prior to construction that will identify locations sensitive to vibration, conduct preliminary review of vibration sensitive structures, and make reparations if construction-related damage occurs.

Basement/foundation videotaping prior to construction will be offered for structures within 150 feet of areas where vibration effects from construction activities could occur; where pavement and/or bridges will be removed; or where piling and/or steel sheeting is planned. These areas will be identified during the Project's design phase and monitoring will occur before, during, and after the construction phase. A Special Provision for "Monitoring Vibrations" will be included in the final design plans.

## 4. Errata

### 4.1. Environmental Assessment (EA) Main Document

Below are updates and corrections to the Environment Assessment by page number. This includes corrections to the number of impacted noise receptors, as well as additional acknowledgement of how the original construction of I-375 affected the local neighborhoods and led to the ultimate destruction of those communities. Refinements to the mitigation measures and community enhancements have been made to address public comments. These changes are discussed in **Chapter 2 (Comments and Responses)** and are reflected in the updated Project mitigation measures and community enhancements presented in **Chapter 3 (Project Mitigation and Community Enhancements Summary (Green Sheet))**. Edits to the Green Sheet presented in the Environmental Assessment were made to Nonmotorized and Vehicular Safety (item 2), Social and Economic Environment (item 3), and Natural Environment (item 7) as follows:

*Nonmotorized and Vehicular Safety* (item 2) now includes measures related to promote safety at pedestrian crosswalks (item 2.a.), a study to determine the feasibility of one-stage pedestrian crossing (item 2.a.), a clarification on terminology from accessible to audible pedestrian signals (item 2.a.), refinements related to slowing vehicle speeds (item 2.b.), adding nonmotorized users as a consideration in the special event analysis (item 2.c.), and a commitment to further evaluate the number of lanes of the boulevard (item 2.c.).

*Social and Economic Environment* (Item 3) now includes measures related to the treatment of excess ROW (item 3.a.), the development of a community enhancements plan to address I-375 historic environmental justice impacts as well as the formation of a new local advisory committee (item 3.b.), refinements to measures related to unauthorized occupants (item 3.c.), and the development of a Small Business Enterprise (SBE) Program (item 3.d.).

*Natural Environment* (item 7) now includes a measure related to continued stormwater management coordination (item 7.d.).

In addition, Community Enhancements from EA Section 4.20. (Project Mitigation and Enhancements Summary (Green Sheet)) were incorporated into the Green Sheet in items 2.a. (Pedestrian and Bicycle Safety), 3.a. (Right-of-Way), 3.b. (Community Enhancements to Address I-375 Historic Environmental Justice Impacts), and 7.d. (Stormwater Management).



## Page 34

Published:

**Table 2: Affected Environment and Potential Impacts Summary**

Study Parameters	Preferred Alternative	Mitigation
Noise Impacts	27 impacted receptors	None. There is no feasible way to build a noise wall that provides enough benefit for the receptors

Corrected (typographical error):

**Table 2: Affected Environment and Potential Impacts Summary**

Study Parameters	Preferred Alternative	Mitigation
Noise Impacts	13 impacted receptors	None. There is no feasible way to build a noise wall that provides enough benefit for the receptors

## Page 59

Additional information regarding the history of I-375 was added to the EA in response to public comments requesting acknowledgement of the environmental injustices the original construction of the freeway caused.

Published:

In the early 1960s, the city of Detroit implemented an urban renewal program that resulted in the demolition of the Black Bottom and Paradise Valley neighborhoods, both prominent African American districts located on Detroit's Near East Side, which were replaced by I-375 and Lafayette Park, a mixed-income development combining residential townhouses, apartments, and high-rises with commercial areas (MDOT, 2014). I-375 created a divide between the CBD and the neighborhood to the east. The dense residential and commercial streets were demolished and replaced with a depressed freeway with east and west connectivity provided by bridges over the freeway. The Preferred Alternative would remove the barrier of the depressed freeway, creating a more visually connected community.

Amended:

Details about Detroit's founding and history are documented in the Project's above-ground survey and impacts evaluation.<sup>4</sup> A discussion of the context of the study area as it relates to

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<sup>4</sup> Commonwealth Heritage Group, I. (2018). I-375 Improvement Project: Above-Ground Survey and Impacts Evaluation City of Detroit, Wayne County, Michigan. Lansing: Michigan Department of Transportation.

commerce and industry can be found in the subsequent addendum report.<sup>5</sup> MDOT has received many public comments on the history associated with the original construction of I-375 and its disproportionate effects on the predominantly black neighborhoods of Black Bottom and Paradise Valley, see **Figure 3**. Similar community impacts occurred throughout Detroit and other major U.S. cities as a result of eminent domain actions related to freeway building.

The construction of I-375 was spurred by the Federal-Aid Highway Act of 1944, which was a post-World War II plan to connect cities across the United States. Funding for the interstate system was first made available in the Federal-Aid Highway Act of 1952 in a 50-50 federal-state match. The Act ultimately created a 40,000-mile interstate highway system that connected major cities and industrial areas, as well as a secondary feeder system that connected markets and rural regions to interstates.<sup>6</sup> Around this same period, federal legislation meant to address post-World War II housing shortages was enacted. The Federal Housing Act of 1949 provided states and cities funding to clear deteriorating housing stock to make way for new housing. Economically impoverished areas, identified by the Detroit Housing Commission of the 1940s as "slum areas," were thus targeted for highway development and urban renewal. In this manner, Black Bottom and Paradise Valley were identified as slum areas.<sup>7</sup> The resulting projects and programs, including the construction of I-375, disproportionately affected low-income and minority populations.

Public comments received by MDOT on the reconstruction of I-375 highlighted the vibrant history of the affected neighborhoods and the complicated and racist social impacts of the post-World War II urban renewal and highway development programs. Black Bottom and Paradise Valley are known to have flourished throughout the 1920s and 30s with successful black-owned businesses, musicians, physicians, and lawyers.<sup>8</sup> In 1938, the Detroit office of the Works Progress Administration and the Detroit Housing Commission conducted a Real Property Survey of Detroit. Housing commissioners found two-thirds of the housing stock in Paradise Valley and Black Bottom to be substandard and in substantial disrepair. Beginning in the early 1940s, the Common Council of the city of Detroit began to condemn substandard properties in Black Bottom and Paradise Valley.<sup>9</sup> The city of Detroit cleared Black Bottom and Paradise Valley to develop medical, public housing, and transportation infrastructure with the intent of spurring economic growth.

By 1950, 423 residences, 109 businesses, 22 manufacturing plants, and 93 vacant lots had been condemned.<sup>10</sup> Replacement housing at Lafayette Park and other middle-class housing

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<sup>5</sup> Commonwealth Heritage Group. (2020). 2020 I-375 Practical Alternative 5B Direct Above-Ground Survey Addendum Report. Lansing: Michigan Department of Transportation. Retrieved 2020, from [https://www.michigan.gov/documents/mdot/Above-Ground\\_Addendum\\_Report\\_Final\\_711916\\_7.pdf](https://www.michigan.gov/documents/mdot/Above-Ground_Addendum_Report_Final_711916_7.pdf).

<sup>6</sup> Williamson, J. (2012, 16). Federal Aid to Roads and Highways Since the 18th Century: A Legislative History. Congressional Research Service 7-5700, p. 16.

<sup>7</sup> Hill, A. B. (2015, February 4). DETROITography. Retrieved from Map: Slums, Industrial, and Low Cost Housing in Detroit 1941: <https://detroitography.com/2015/02/04/map-slums-industrial-and-low-cost-housing-in-detroit-1941/>.

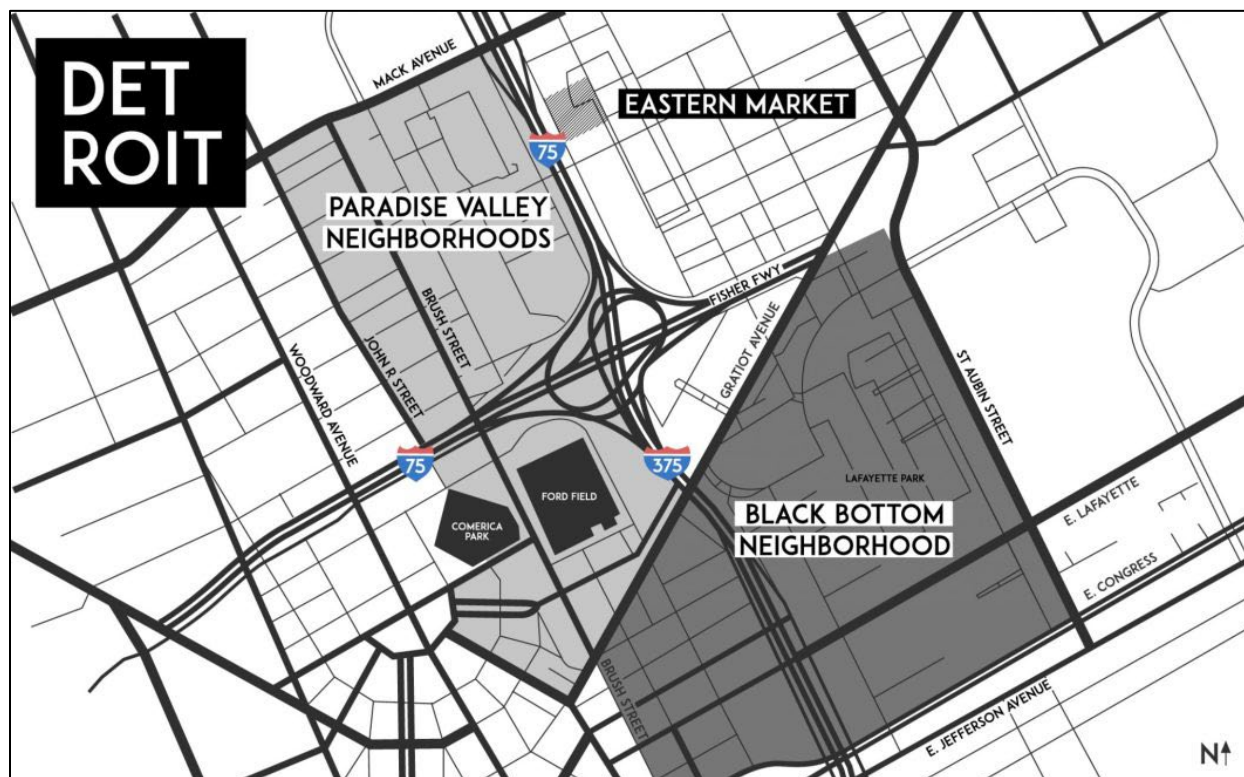
<sup>8</sup> Detroit Historical Society. (2021). Black Bottom Neighborhood. Retrieved from Detroit Historical Society: <https://detroithistorical.org/learn/encyclopedia-of-detroit/black-bottom-neighborhood>.

<sup>9</sup> Sugrue, T. (2014). The Origins of the Urban Crisis, Race and Inequality in Postwar Detroit. In T. Sugrue, The Origins of the Urban Crisis, Race and Inequality in Postwar Detroit (pp. 47, 94, 101). Princeton University Press.

<sup>10</sup> Sugrue, T. (2014). The Origins of the Urban Crisis, Race and Inequality in Postwar Detroit. In T. Sugrue, The Origins of the Urban Crisis, Race and Inequality in Postwar Detroit (pp. 47, 94, 101). Princeton University Press.

developments were difficult to afford for many of the people who were evicted from Black Bottom and Paradise Valley.<sup>11</sup> According to 1970 Census data, three-quarters of Lafayette Park and the surrounding residential units were occupied by whites. The coupled effect of resident displacement and the absence of safe, sanitary, and affordable housing was socially and economically damaging to the black population in Detroit. The *Detroit Free Press* called the effort "urban renewal's first fiasco" in a 1974 reflection article<sup>12</sup>.

**Figure 3: Black Bottom and Paradise Valley Neighborhoods**



Source: *Detroit's Black Bottom and Paradise Valley, What Happened?*<sup>13</sup>

In 1959, the city of Detroit, Wayne County, and the Michigan State Highway Department (renamed in 1973 to Michigan Department of Transportation) began construction of I-375 through Hastings Street, the central business district that bridged Black Bottom and Paradise Valley. The highway created a divide between the Detroit central business district and the neighborhood to the east. Numerous blocks of commercial and residential buildings were levelled to make way for the depressed freeway and urban renewal. Although I-375 featured a number of cross-bridges, many properties declined due to reduced connectivity and more so because the community's economic and residential base had been substantially dislocated.

MDOT acknowledges that the clearing of these historic neighborhoods for urban renewal projects, which included the I-375 freeway, disproportionately affected blacks, low-income, and minority populations. The razing of Black Bottom and Paradise Valley remains a serious and

<sup>11</sup> Detroit Historical Society. (2021). Black Bottom Neighborhood. Retrieved from Detroit Historical Society: <https://detroithistorical.org/learn/encyclopedia-of-detroit/black-bottom-neighborhood>

<sup>12</sup> Coleman, K. (2017, 10 05). Detroit's Black Bottom and Paradise Valley, What Happened? Retrieved from Detroit Is It: <https://detroitisit.com/black-bottom-and-paradise-valley-communities/>

<sup>13</sup> Ibid.

consequential loss to the city of Detroit. Several local historians are researching the history of these neighborhoods and helping bring to light the effects these federal programs had and the lingering adverse effects that resulted as families were displaced, many of whom moved to other areas of Detroit that then became overcrowded. Since many who lived and worked in these neighborhoods were tenants, there is difficulty in identifying the true extent of these historical impacts. For example, records that may report on who was compensated for condemnation would underrepresent the numbers and identities of residents of these communities that were forced to leave to make way for construction of the freeway. MDOT acknowledges that at the time, the condemnation process in Detroit was on its face discriminatory and can fairly be represented in today's terms as an environmental injustice that disproportionately affected a large population of low-income and minority populations.

Other U.S. cities experienced similar discriminatory highway and housing construction projects during the 1950s and 1960s. To prevent future such impacts, the Uniform Relocation Assistance and Real Property Acquisition Policies Act was passed in 1970. As amended, 42 U.S.C. 4601-4655 (Uniform Act) now addresses the payment of moving and related expenses to assist persons who move because of Federal or federally assisted projects. The Uniform Act, as it is called, was intended to ensure fair treatment is given to people whose property is acquired under eminent domain. See EA Section 4.5.4 (Right-of-Way) for additional information on ROW acquisition and sale of excess real property. The current NEPA process, adopted in the early 1970s and under which this environmental assessment was prepared, requires agencies to identify and mitigate environmental justice impacts. Executive Order (EO) 12898 on Environmental Justice, issued in 1994, focused more attention on the effects federal actions have on low-income and minority populations. Under EO 12898, FHWA identifies whether low-income and minority populations may suffer disproportionately high and adverse effects of federally funded highway projects. Such effects are identified in consultation with the potentially affected community.

**Page 60** At the end of **EA Section 4.5.2**, add the following text:

MDOT's Title VI Program assigns roles, responsibilities, and procedures for preventing discrimination in MDOT programs and activities. Title IV is further discussed in EA Section 4.5.6.2 Title VI. Relevant MDOT programs that will be applied to the Project include the following:

- Disadvantaged Business Enterprise (DBE) Program, which is a federally required program designed to ensure that firms owned and controlled by minorities, women and other socially and economically disadvantaged persons have the opportunity to grow and become self-sufficient through participation in federally funded transportation projects.
- Small Business Enterprise (SBE) Program, which MDOT developed as a race- and gender-neutral program to provide small businesses expanded opportunities to participate on federally assisted projects. The program is designed to increase the number of contracts awarded to small businesses and promote the use of small businesses to directly contract with MDOT. In addition to the SBE Program, the MDOT's Mentor-Protégé Program assists small businesses by allowing teaming with larger firms to help small businesses get the experience they need to compete on MDOT contracts.
- Michigan Unified Certification Program, which allows applicants for the DBE Program to apply only once for DBE certification.

- Equal Employment Opportunity contract compliance, which ensures that federal-aid contractors, sub-contractors, vendors, and material suppliers do not discriminate in employment and contracting practices based on race, color, religion, sex, national origin, age, or disability.
- On The Job Training Program, which requires full use of available training and skill-improvement opportunities assure the increased participation of minorities, women, and disadvantaged persons in all phases of the highway construction industry.
- Bonding and Education Program, which is design to provide small and disadvantaged businesses the tools and resources they require to compete for transportation projects by obtaining or increasing their bonding capacity and acquiring capital.

## Page 96

Published:

The noise analysis found that predicted future design year (2040) noise levels near the Preferred Alternative would approach or exceed the NAC at 27 residences. The noise levels at these 27 impacted receptors would range from 66.0 to 73.9 dB(A) Leq (h).

Corrected (typographical error):

The noise analysis found that predicted future design year (2040) noise levels near the Preferred Alternative would approach or exceed the NAC at 13 residences. The noise levels at these 13 impacted receptors would range from 66.0 to 73.9 dB(A) Leq (h).

## Page 131

Published:

MDOT. (2017). *I-375 Improvement Project: Above-Ground Survey and Impacts Evaluation*. Detroit.

Amended:

Commonwealth Heritage Group. (2020). *2020 I-375 Practical Alternative 5B Addendum Report: Land Use History and Assessment of Archaeological Potential*. Lansing: Michigan Department of Transportation.

Commonwealth Heritage Group. (2020). *2020 I-375 Practical Alternative 5B Direct Above-Ground Survey Addendum Report*. Lansing: Michigan Department of Transportation.

Commonwealth Heritage Group, I. (2018). *I-375 Improvement Project: Above-Ground Survey and Impacts Evaluation City of Detroit, Wayne County, Michigan*. Lansing: Michigan Department of Transportation.

Commonwealth Heritage Group, I. (2018). *I-375 Improvement Project: Land Use History and Assessment of Archaeological Potential, City of Detroit, Wayne County, Michigan*. Lansing: Michigan Department of Transportation.