

5. Final Section 4(f) Evaluation

This Section includes the DEIS language followed by the Preferred Alternative discussion at the end of each subsection surrounded by a green outline, like that around this paragraph. Bold text highlights DEIS information that has been updated.

5.1 Introduction

This section describes and evaluates impacts to properties protected by Section 4(f) of the Department of Transportation Act of 1966. The purpose of the Section 4(f) Evaluation is to ensure that, where there is “use” of protected resources, all prudent and feasible alternatives to such use have been considered. To avoid use of protected resources the DRIC study process has included all possible measures to minimize harm. Coordination with appropriate agencies has occurred.

It is noted the proposed project will not involve any “6(f)” properties, i.e., those benefiting from monies of the Land and Water Conservation Fund.

Under the National Historic Preservation Act (NHPA), the Federal Highway Administration (FHWA) has determined the DRIC project will result in the use of the potentially historic properties and recreational resources noted below (Table 5-1). **The Preferred Alternative uses the five resources noted on the list below.**

- **Berwalt Manor Apartment Building (No use by Preferred Alternative)**
- **Kovacs Bar (Required for Preferred Alternative)**
- **St. Paul African Methodist Episcopal (AME) Church (Required for Preferred Alternative)**
- **Frank Beard School (No use by Preferred Alternative)**
- **Detroit Savings Bank/George International Building (No use by Preferred Alternative)**
- **South Rademacher Community Recreation Center (Required for Preferred Alternative)**
- **South Rademacher Playground (Required for Preferred Alternative)**
- **Post-Jefferson Playlot (Required for Preferred Alternative)**

What is a Protected Resource?

Protected resources include historic sites, publicly-owned parks, recreation areas, and wildlife and waterfowl refuges.

What is *Use* of a Section 4(f) Property?

Use means: 1) permanent incorporation into a transportation facility; or, 2) proximity impacts so severe that the activities, features or attributes that qualify the property are substantially impaired.

FHWA and MDOT have consulted with the State Historic Preservation Officer (SHPO) on determinations of eligibility, use of Kovacs Bar and St. Paul AME Church, and measures to minimize harm. FHWA and MDOT have consulted with the Detroit Department of Recreation on use of the South Rademacher Community Recreation Center, South Rademacher Playground, and Post-Jefferson Playlot, and measures to minimize harm. This final Section 4(f) document was prepared for processing under the procedures set forth in FHWA regulation 23 CFR 774. A draft Memorandum of Agreement (MOA) updated from the DEIS is included in Appendix E. A final MOA will be signed prior to signing of the Record of Decision.

5.2 Proposed Action and Need for Project

A new border crossing is needed in the Detroit-Windsor area to:

- Provide safe, efficient and secure movement of people and goods across the Canadian-U.S. border in the Detroit River area to support the economies of Michigan, Ontario, Canada and the U.S.
- Support the mobility needs of national and civil defense to protect the homeland.

To address future mobility requirements (i.e., at least 30 years) across the U.S.-Canada border, there is a need to:

- Provide new border-crossing capacity to meet increased long-term demand;
- Improve system connectivity to enhance the seamless flow of people and goods;
- Improve operations and processing capability in accommodating the flow of people and goods at the plazas; and,
- Provide reasonable and secure border crossing options in the event of incidents, maintenance, congestion, or other disruptions.

5.2.1 The Economy

The United States and Canada have the largest bilateral trading partnership in the world. In 2004, the total U.S. trade with Ontario, alone, was U.S. \$407 billion.¹ The U.S. is Canada's largest export market.² The U.S. International Trade Administration identifies Canada as the largest export market for 38 of the 50 states, including Michigan.³

¹ Bureau of Transportation Statistics (BTS) Transborder Surface Freight Database.

² Standing Senate Committee on National Security and Defense, *Defense of North America: A Canadian Responsibility*, September 2002.

³ Ibid.

Seventy percent of the U.S.-Canada trade moves by truck. Approximately 28 percent of surface trade between the United States and Canada passes through the Detroit River area.⁴ This trade is critical to the manufacturing base of the region. Manufacturing accounts for almost 20 percent of employment in Ontario, and in the five-state region of Michigan, Illinois, Indiana, Ohio, and Wisconsin.⁵

An economic study commissioned by The Partnership⁶ indicated the U.S. would lose up to 71,000 U.S. jobs and Canada would lose 27,000 jobs between 2005 and 2035, if no improvements were made to border crossing capabilities in the Detroit River area. The combined annual production loss in the U.S. in 2035 is forecast to be \$9.4 billion (U.S.).

5.2.2 Civil and National Defense and Homeland Security

Homeland security involves protecting society against man-made threats and disasters. This involves keeping critical infrastructure in sound condition to protect people and property. It also involves mitigating impacts to individuals, communities, and the environment. Each border crossing system component (crossing, plaza, and connecting roadway) must be developed with homeland security needs in clear focus, including its engineering, location, and function (workforce/staffing, communications and information sharing).

National and civil defense issues involve protecting the homeland against man-made and natural threats and disasters. Emergency response to foreign military threats, natural disasters, communicable disease outbreaks and environmental emergencies on the Great Lakes depends on critical links in the transportation system. These links are at the border itself and on the national highway systems connecting to it. Therefore, it is essential to have reasonable options to move people and goods across the border in the Detroit River area.

This need is recognized in the “Smart Border Declaration,”⁷ signed by the United States and Canada in December 2001. The Declaration is accompanied by a 30-point Action Plan that makes it clear both governments place an exceptionally high priority on border security and infrastructure needs. It is reinforced by the “Security and Prosperity Partnership” established by President Bush and former Canadian Prime Minister Martin in February 2005. The importance of the Detroit-Windsor gateway was also recognized

⁴ The Corradino Group, *Detroit River International Crossing Study Travel Demand Forecasting Working Paper*, July 2005.

⁵ DRI-WEFA, Inc., U.S. Regional Economic Service, 2002.

⁶ URS Corporation, in association with The Corradino Group, IBI Group and HLB Decision Economics, Inc., *Planning/Needs and Feasibility Study*, January 2004.

⁷ Smart Border Declaration and Associated 30-Point Action Plan to Enhance the Security of Our Shared Border While Facilitating the Legitimate Flow of People and Goods. U.S. Department of Homeland Security, December 2001.

by President Bush and Canadian Prime Minister Harper at their “summit” meetings in March 2006, and in April 2007.

5.2.3 Capacity and Connectivity

Over the past 30 years, bilateral trade in goods and services has grown faster than gross domestic product (GDP), i.e., at an annual rate of approximately 11 percent. A report by Global Insight forecasts that bi-national commerce will grow 250 percent in the next 20 years.⁸ The North American Free Trade Agreement (NAFTA), and similar pacts, will continue to have significant positive effects on trade between the two nations.

Over the next 30 years, Detroit River area cross-border passenger car traffic is forecast to increase by approximately 57 percent from a 2004 base, and truck traffic by 128 percent. Traffic demand could exceed the cross-border roadway capacity as early as 2015, if significant growth occurs. Even under “low” projections of cross-border traffic, the border crossing capacity (bridge and tunnel, combined) will be reached between 2030 and 2035. When that happens, the system will become gridlocked. These forecasts indicate that there will be inadequacies in: 1) the roads leading to the existing bridge and tunnel; 2) the ability to process vehicles through Customs services; and, 3) the capacities (number of lanes) of the Ambassador Bridge and Detroit-Windsor Tunnel themselves.

The Ambassador Bridge is two lanes in each direction. It is more than 75 years old and needs continuous maintenance. This often requires at least one lane to be closed. Blockages due to maintenance and incidents are common, with queues and delays that reach beyond the limits of the bridge and its plazas.

In Canada, most of the 17 signalized intersections along Huron Church Road (the access road to the bridge) are approaching capacity with several movements at critical levels. Traffic flow is often unstable, with periods of congestion occurring unpredictably along the corridor. Anticipated increases in border crossing traffic, combined with modest growth in background traffic, means that Huron Church Road will likely exceed capacity within five to ten years. As traffic volumes approach the road’s capacity, congestion, queuing and diversion of traffic onto other roads will become more frequent. The effects of this problem will restrict the movement of people and goods that serve the needs of the two nations. Likewise, local communities around the border crossings will experience impacts to air quality and noise levels.

The Detroit-Windsor Tunnel has one lane in each direction with sharp curves in the approaches, which restrict truck usage. The most limiting factor of the Tunnel involves

⁸ Global Insight, Inc., World Trade Service Forecast, 2nd Quarter, 2003.

the approach roads. Waiting vehicles often extend into downtown Detroit and downtown Windsor. The downtown road networks in each city are also subject to normal peak-hour congestion.

As travel increases, so will delay and queuing in Detroit and Windsor. While there are plans for operational and border processing facilities improvements, both plazas will continue to be constrained by adjacent development and the connecting street network. There is a need for a new border crossing.

5.3 Description of Resources

5.3.1 Historic Resources

The *National Register of Historic Places* (NRHP) was created by the National Historic Preservation Act of 1966. It is administered by the National Park Service. The NRHP has established criteria for determining historic significance. These require a property to have integrity of location, design, setting, materials, workmanship, feeling, and association. Additionally, the property must meet one of the following:

- Criterion A: be associated with a significant event;
- Criterion B: be associated with the lives of significant persons;
- Criterion C: embody the distinctive characteristics of a type, period or method of construction, or represent the work of a master; or,
- Criterion D: have yielded or be likely to yield information important in history or prehistory (usually archaeological sites).

A property typically has to be at least 50 years old to be considered *National Register* eligible. No archaeological sites were recorded that warrant preservation in place and, therefore, none are subject to Section 4(f).

Berwalt Manor Apartment Building, 760 South Campbell (No use by Preferred Alternative)

Description

The Berwalt Manor Apartment Building is, perhaps, the only high-style apartment building located in the Area of Potential Effects (APE) (refer to Figure 3-35). The building's H-shaped footprint is a rare building type in the neighborhood. The building was likely constructed circa 1929 and is a fine example of the Mediterranean style (Figure 5-1A and B).

Figure 5-1A
Berwalt Manor Apartment Building, 760 South Campbell Street
Detroit River International Crossing Study



Source: Commonwealth Cultural Resources Group, Inc.

The Berwalt Manor Apartment Building is located at 760 Campbell Street, on the east side of Campbell at its intersection with the Fisher Freeway (I-75) service drive. The freeway is directly north of the property, and the building is surrounded to the east, west and south by single-family and multi-family residences.

Rising four stories, the building is constructed of reinforced concrete, faced with brick. The low-pitched roof is covered with Mission/Spanish tiles. Textured walls, stone accents, and deep windows and doors serve to add décor to the building. Other unique aspects are inner courts/patios, and elaborately framed Spanish Colonial entrances. All of the above architectural elements are characteristic of the Mediterranean style, a popular early 20th century architectural style modeled after buildings found in southwestern

Figure 5-1B
Aerial View of Berwalt Manor Apartment Building
Detroit River International Crossing Study



Source: The Corradino Group of Michigan, Inc.

Europe. Other design elements include low, elongated massing (popularly used for multi-family residential buildings of the period), casement windows, porches and pergolas, low-pitched roofs, loggias and hanging balconies, metal window grilles, and balconies with a hand-wrought appearance. The only alterations to the building appear to be the replacement of some original windows and doors. The construction of I-75 immediately north of the building impacted the setting.

History

Little published information is available for the Berwalt Manor Apartment Building. Early Sanborn maps indicate it was constructed ca. 1929 as an apartment building, and it continues to serve as an apartment complex today.

Significance

The Berwalt Manor Apartment Building is recommended eligible for the NRHP under Criterion C (architecture). The intact, multi-family residential building is an excellent example of the Mediterranean style, laid out in an H-shaped plan. The building is one of the most architecturally interesting apartment buildings in the APE and the only one displaying elements of the Mediterranean style. The only alterations appear to be the construction of I-75 (which has impacted the setting), and the replacement of some original windows and doors. These changes do not affect the building's architectural integrity. The building also retains integrity of location, design, workmanship, feeling, and association.

Kovacs Bar, 6982 West Jefferson Avenue (To be removed by Preferred Alternative)

Description

The Kovacs Bar building is thought to have been constructed in 1889 (Figure 5-2A and B). The property is significant for its association with the commercial/social history of the APE, as it houses Kovacs, a neighborhood establishment serving the needs of Delray for more than 60 years. Neighborhood bars and restaurants were important to the fabric of any community; Delray was no exception. Many of the bar patrons were employed in the surrounding local industries, and these establishments provided a social outlet for them.

Kovacs Bar is situated on the north side of West Jefferson Avenue. A large one-story commercial building is attached to the east elevation. South Post Street forms the western boundary of the property. Located north of Kovacs is a late 19th century commercial complex.

Figure 5-2A
Kovacs Bar, 6982 West Jefferson Avenue
Detroit River International Crossing Study



Source: Commonwealth Cultural Resources Group, Inc.

The two-story building has a symmetrical layout and is oriented perpendicular to West Jefferson Avenue, with the façade facing the street. Constructed primarily of soft brick in a Common Bond brick pattern, the building is capped with a flat metal roof. Stepped parapets surround the flat roof on the east, west, and south elevations. Circa 1950s smooth enameled panels have been applied to the lower portion of the façade but also extend to the west elevation. Most windows on the building have been replaced, and some openings have been reduced and infilled with glass block. On the west elevation, some openings have been altered and infilled with plywood covering. Appended to the rear of the original structure is a one-story butterfly-roof addition, also constructed of brick. This appendage is capped with an asphalt shingle roof. A second one-story addition extends from the butterfly-roof

Figure 5-2B
Aerial View of Kovacs Bar
Detroit River International Crossing Study



Source: The Corradino Group of Michigan, Inc.

addition and has a shed-roof covered in rolled asphalt siding. A one-story, two-bay rusticated, concrete block garage is located at the rear of the property. All portions of the building are vernacular in style, but stone sills, brick corbelling (mostly evident on the façade), and a Queen Anne-inspired side porch (west elevation) add visual interest to the building.

History

Although the exact date of the Kovacs Bar building is uncertain, it appears to have been erected ca. 1889. A Sanborn map from 1897 confirms the building in its present location. It was first known as Martin Kilian's Hotel.

No mention of the property is indicated in Detroit city directories prior to 1907. That year, the property is listed under the address of 1900 West Jefferson Avenue as the Angus Smith Hotel, including a restaurant with "choice wines, liquors and cigars." In 1913 the property was known as the Simpson Hotel with William Simpson as the owner. Boarding was offered "by day or week at reasonable rates." William Simpson was a cigar manufacturer of the "MK, OK, and other brands of Union made cigars." The 1919 Detroit city directory indicates the building was no longer a hotel, but, instead, housed three separate commercial units: Mike Marosi, a shoemaker; Sampad Zadigian, coal; and, the third unit was vacant at that time.

The building was vacant in 1928. By 1936 the property was known as the Angela Gatto Beer Garden. Evolving ownership resulted in the building being the Michl Kovac Beer Garden in 1941, and, finally, Kovacs Bar Tavern in 1956.

Kovacs was established by a Hungarian immigrant who moved to Detroit from Ohio. The exact date the family opened the business is arguable. The oldest liquor license dates to 1944 according to the current owners, Bob and Delores Evans. Various members of the Kovacs family operated the bar until 1996, when the Evans bought the property. The business is in operation today.

Significance

Kovacs Bar is recommended eligible for the NRHP under Criterion A (events). Under Criterion A, Kovacs is significant for its association with the commercial/social history of the APE, as a local neighborhood establishment catering to the needs of the Delray population for over 60 years. Neighborhood bars and restaurants were vital to the fabric of Delray. Many of the bar patrons were employed in the surrounding local industries, and the establishment provided a social outlet for them. The building has undergone alterations that have reduced the integrity of materials and design; however, the building

retains integrity of location, workmanship, feeling, and association. It is structurally sound.

St. Paul African Methodist Episcopal Church, 579 South Rademacher Street (To be removed by Preferred Alternative)

Description

St. Paul African Methodist Episcopal (AME) Church was constructed in phases, beginning in 1928 and ending in 1944 (date stones) (Figure 5-3A and B). The church is a testament to the African Methodist Episcopal faith in Delray.

St. Paul AME Church is located on the east side of South Rademacher Street, between West Jefferson Avenue and South Street. A paved parking lot and empty, grassy lots form the northern boundary of the church property. Residential housing and empty lots surround the church to the east, west, and south. No associated buildings are located on the property.

Figure 5-3A
St. Paul African Methodist Episcopal Church, 579 South Rademacher Street
Detroit River International Crossing Study



Source: Commonwealth Cultural Resources Group, Inc.

Primarily constructed of brick, the St. Paul AME Church stands one story tall with a raised basement and is situated perpendicular to South Rademacher Street. The church is essentially rectilinear, rests on a stone foundation, and features a bell tower centrally placed on the façade. This design is similar to the Basilican Plan building form, in which the church has a linear form with a central aisle. A variety of brick finishes demonstrate the building evolution of the church, as it was constructed in various stages between 1928 and 1944. The structure is capped with an asphalt shingle, gable roof which

also accompanies ten dormer windows, five on the east roof slope and five on the west. It is not clear if these dormers are original to the church, as they are now sided with vinyl. Of architectural interest are original, single-hung, three-over-three stained glass tripartite windows and lancet windows. Modifications to the church include glass block infill windows (present on the raised basement level), replaced front doors, and a modestly-altered front porch.

History

Little published information is available on the church, which first appears in Detroit city directory in 1928. The St. Paul AME congregation was founded in 1917. This year coincides with a date stone on the church, which may indicate the laying of the foundation. A second date stone on the church indicates the year 1944, likely the date when construction was completed. The time lapse may be due, in part, to an historically small congregation. It is also likely that the congregation may have been slow to find the financial resources to complete the church. Given the time lapse in construction, and the raised basement of the facility, it is likely that early congregations conducted their services in the lower level of the building. The current pastor of the church is Jeffrey L. Baker.

Significance

St. Paul AME Church is eligible for listing on the NRHP under Criterion A (events) as the lone surviving structure associated with early African-American settlement in Delray. St. Paul is the oldest resource in Delray left standing that can attest to

Figure 5-3B
Aerial View of St. Paul AME Church
Detroit International Crossing Study



Source: The Corradino Group of Michigan, Inc.

the community's early twentieth century African American heritage. St. Paul remains the earliest-constructed and longest-established African American church in Delray. It is also the only African American Episcopal (AME) church ever constructed in the Delray community (Michigan Historical Records Survey Project 1940; Rev. Jeffrey Baker, personal communication, 2008). The hallmark of the African American community in Delray has historically been the church. No other resources (community halls, club buildings, etc.) can attest to Delray's African American heritage.

Historically, St. Paul was one of three African American churches established in Delray during the early twentieth century. The first African American church in Delray was the Green Avenue Baptist Church, located at the corner of Green and Gould streets. This church is shown on a 1910 Sanborn Map. The church is no longer present. The other African American church was a Baptist church that did not build their own church, like St. Paul did, but instead located in an old Catholic church (formerly occupied by All Saints). This church burned ca. 1995 and the congregation (First Baptist Church of Southwest Detroit) continues to worship in a new structure on the same site (at Crossley and Gould streets). So although St. Paul was not the first African American church constructed in Delray, it is now the oldest as the other two older-known African American (Baptist) churches have been demolished. St. Paul is the oldest remaining African American church south of Fort Street (refer to Figure 3-35). It is the only African American church built entirely through the monetary and physical efforts of the African American community in Delray. No other extant buildings can attest to Delray's African American history of the early twentieth century. It is the oldest African American church in Delray by far, and it is the only one still in its historic church building.

The church has been a neighborhood fixture since 1928. Furthering its significance is that the church is still associated with its original congregation. Adding to the church's significance is that the church represents a modest, but intact, example of the Basilican Plan building form. Although having undergone modest changes, the church retains building integrity and is structurally sound. St. Paul AME retains integrity of location, setting, materials, design, workmanship, feeling, and association.

Frank H. Beard School, 840 North Waterman Street (No use by Preferred Alternative)

Originally this school, located in Springwells Township (Detroit had not yet expanded its boundaries this far), was known as Garfield School, in honor of President Garfield. The present school building (Figure 5-4A and B) replaced an earlier frame structure that was so overcrowded it was declared unsafe. The new 12-room brick school was designed by prominent school architects Malcomson and Higginbotham in 1896, with a two-room addition completed in 1900 giving the building 14 classrooms.

Figure 5-4A
Frank H. Beard School, 8840 North Waterman Street
Detroit River International Crossing Study



Source: Commonwealth Cultural Resources Group, Inc.

In 1906, the area of Springwells Township, that included Garfield School, was annexed to the City of Detroit, which then had two schools named for President Garfield. To correct the situation, the school on Waterman was renamed the Frank H. Beard School in honor of the local greengrocer and florist who had served the community as a district school director for 17 years. In 1984, at the time of its placement on the NRHP, the State Register of Historic Sites, and local designation by the City of Detroit, the school was one of the last 19th century elementary schools functioning in Detroit. Today the building serves as the Beard Early Education Center. There is a playlot on the north side of the property. No playground equipment or playlots would be used by any of the alternatives.

Figure 5-4B
Aerial View of Frank H. Beard School
Detroit River International Crossing Study



Source: The Corradino Group of Michigan, Inc.

Detroit Savings Bank/George International Building, 5705 West Fort Street (No use by Preferred Alternative)

Description

The Detroit Savings Bank/George International Building was likely constructed ca. 1920 (Figure 5-5A and B). It is significant for its association with the Detroit Savings Bank Corporation, the first banking company to offer wage earners in Detroit a place to securely deposit their money. The bank is also significant as an example of the Neo-Classical Revival style on a commercial bank building.

The Detroit Savings Bank/George International Building anchors the southeast corner of the intersection of Fort and Campbell streets. It is oriented perpendicular to Fort Street. Commercial buildings are to the west, and vacant lots are located south and east.

The two-story building has a rectangular footprint. The south, east, and west elevations are constructed of brick, and the façade is built of stone. The bank displays elements of the Neo-Classical Style, popular in early 20th century public building and bank design. Design elements include a symmetrical layout, a reliance on Greek classical forms (observed by the fluted Doric columns), and a trabeated façade. Locally, the building is an example of a *distyle in antis* building, a temple-like structure with a recessed entrance fronted by twin columns set between sections of enframing walls. The only alterations appear to be replacement windows and doors, and the subsequent modification of openings.

Figure 5-5A
Detroit Savings Bank/George International Building, 5705 West Fort Street
Detroit River International Crossing Study



Source: Commonwealth Cultural Resources Group, Inc.

History

After a wave of bank failures that were a result of the recession of 1847, Michigan Governor Epaphroditus Ransom created the Detroit Savings Fund Institute, in March 1849. It provided a safe place for wage earners to invest their savings. Detroit had three other banks at that time, but they were established to serve the needs of business clients only. The Detroit Savings Fund Institute opened for business that same year.

Figure 5-5B
Aerial View of Detroit Savings Bank/George International Building
Detroit River International Crossing Study



Source: The Corradino Group of Michigan, Inc.

By 1870, the Institute had assets of \$1 million. One year later, the organization changed its name to the Detroit Savings Bank, reorganizing as a corporation. At the beginning of the 20th century, the Detroit Savings Bank had \$6 million in assets. The new automobile manufacturing industry was beginning to fuel explosive growth in the area. Detroit's 1906 population of 290,000 would more than triple in the next quarter century. The city's factories attracted thousands of workers during World War II, and the bank provided these wage earners a safe place to invest their money. The bank would eventually change its name to the Detroit Bank, the Detroit Bank & Trust, and finally, Comerica Bank.

Significance

The Detroit Savings Bank/George International Building is recommended as eligible for the NRHP under Criteria A (events) and C (architecture). Under Criterion A, the building is significant for its association with the Detroit Savings Bank Corporation, the first banking company to offer wage earners in Detroit a place to securely deposit their money. The building at 5705 Fort Street served the needs of the population of the study area. Under Criterion C, the bank is significant as an example of a Neo-Classical style commercial building. The only alterations appear to be replacement windows and doors and the subsequent modification of openings. These changes do not affect the building's architectural integrity. The Detroit Savings Bank/George International Building retains integrity of setting, location, design, workmanship, feeling, and association.

5.3.2 Recreational Resources

Two parks and one recreation center fall within the footprint (proposed acquisition area) of the DRIC project (Figure 5-6). The South Rademacher Playground and the South Rademacher Community Recreation Center are proposed for use under all Build Alternatives as they fall within both proposed plazas. The Post-Jefferson Playlot, falls within the west edge of the proposed plazas. These parks and recreation center are under the jurisdiction of the Detroit Recreation Department. Recently Mayor Kwame Kilpatrick's administration proposed selling 92 of Detroit's parks. More than half of the parks for sale are less than an acre in size. A list of parks that are for sale has not been released. Descriptions from the Recreation Department's *Strategic Master Plan* are summarized below.

South Rademacher Community Recreation Center, 6501 South Street (To be removed by Preferred Alternative)

The South Rademacher Community Recreation Center's main facilities include an arts and crafts room, games room, kitchen, weight room and gymnasium. It is approximately 14,000 square feet and was acquired in 1970. It was one of nine recreation centers closed in Detroit, January 2, 2006. This center was used on a regular basis by the community. It was closed for budgetary reasons. The recently improved and expanded Delray Community Center now serves the population in the area.

South Rademacher Playground, 6501 South Street (To be removed by Preferred Alternative)

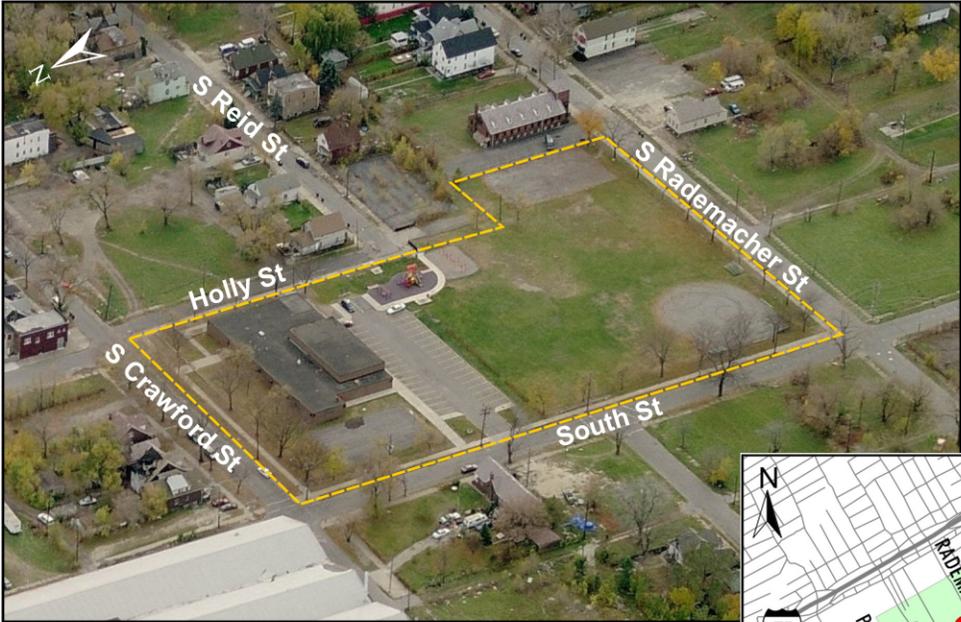
The park is approximately 3.6 acres and is adjacent to the closed Recreation Center. It has a new play structure and swings, a small picnic area, and a large, open field with a softball diamond. There is ample room on this site for additional facilities for picnicking and court games such as volleyball and horseshoes. The basketball court is in very poor condition. The playground was used on a regular basis by the community when the recreation center was open. Since the recreation center's closure there are few visitors as observed in weekly field visits.

Post-Jefferson Playlot, 577 South Post (To be removed by Preferred Alternative)

The Post-Jefferson Playlot is a tiny (0.09 acres), overgrown playlot in a neighborhood of many vacant lots. It appears to be abandoned. It has a few remnants of its facilities, which dates its likely period of development to the 1970s-80s. It appears that residents do not use this playlot. The Recreation Department's Strategic Master Plan recommends the playlot be repositioned.

Figure 5-6
 Affected Parks
 Detroit River International Crossing Study

South Rademacher Playground and Recreation Center



Location Map



Post-Jefferson Playlot



Source: City of Detroit and The Corradino Group of Michigan, Inc.

5.4 Impacts on the Section 4(f) Properties

The properties discussed above were expected to be used by at least one Build Alternative. Those used by the Preferred Alternative are noted as explained below. The properties and potential uses are summarized in Table 5-1.

5.4.1 Historic Resources

- The Berwalt Manor Apartment Building at 760 Campbell Street is located in the area for the northbound ramp from the plaza to I-75. **Every DRIC Build Alternative in the DEIS required the removal of this property, but the Preferred Alternative was developed to avoid it.**
- Kovacs Bar at 6892 West Jefferson Avenue is located in the plaza area under every Build Alternative **and the Preferred Alternative**, which would require the removal of this property.
- St. Paul African Methodist Episcopal Church at 585 South Rademacher Street is located in the plaza area under every Build Alternative **and the Preferred Alternative**, which would require the removal of this property.
- The Frank Beard School, now known as the Beard Early Childhood Center, at 840 Waterman Street, is on the *National Register*. DRIC Alternatives #1, #2, #7, #9, and #16 required about 0.2 acre of school land along the southbound service drive of I-75. DRIC Alternative #5 required about 0.1 acre of land along the southbound service drive and a sliver of land along Waterman. This land is currently used for parking with a small amount of lawn (see Figure 5-7). Alternatives #3, #11 and #14 did not require school land. No playground equipment or playlots were used by any of the alternatives. **The Preferred Alternative will require taking several parking spaces, but the lot to the rear of the school where these are located has been determined not to be part of the *National Register* site, so there is no use of this historic site.**
- Detroit Savings Bank/George International Building at 5705 West Fort Street is located in the area of the proposed northbound ramp from the plaza to I-75. DRIC Alternative #5 required the removal of this property. The other Build Alternatives, **including the Preferred Alternative**, would not use this site.

5.4.2 Recreational Resources

- South Rademacher Playground at 6501 South Street would be removed by the plaza of every Build Alternative, **including the Preferred Alternative.**
- South Rademacher Community Recreation Center at 6501 South Street would be removed by the plaza of every Build Alternative, **including the Preferred Alternative.**
- Post-Jefferson Playlot at 577 South Post would be removed by the plaza of every Build Alternative, **including the Preferred Alternative.**

5.5 Avoidance Alternatives

Build and No Build Alternatives were considered in **multiple corridors** at the outset of the DRIC Study. The Build Alternatives included connections to major highways on each side of the border, plazas in each country for Customs inspections and a bridge or tunnel connecting the two. A wide range of Illustrative Alternatives was generated in five corridors. After accounting for unique circumstances, or “fatal flaws,” the number of Illustrative Alternatives was reduced. Those fatal flaws included a practical inability to tunnel under the Detroit River and the blockage of alternative routes by such obstacles as highly-contaminated sites (e.g., Fighting Island). Other fatal flaws included major industrial plants like that of U.S. Steel, which was willing to relocate part of its operations to make way for the crossing, but at a cost of \$500 million.

The Illustrative Alternatives were further screened to nine Practical Alternatives. All feasible and prudent alternatives were carried forward for detailed study in the DEIS. The development of alternatives and their evaluation are discussed in Section 2, “Alternatives” of this document.

The Preferred Alternative is a hybrid of the best characteristics of the Practical Alternatives. One change with the Preferred Alternative was an engineering adaptation to avoid Berwalt Manor.

5.5.1 Historic Properties

The DRIC Build Alternatives were developed/refined to avoid effects on Section 4(f) properties, where possible. Potential historic resources were identified early in the analysis process. Those that were deemed to have some potential for the *National Register* were avoided, where prudent and feasible. These properties acted as layout “controls.” Avoidance and then minimization guided the development/refinement of the

Build Alternatives. **The Preferred Alternative was able to avoid use of Berwalt Manor.**

Berwalt Manor Apartment Building, 760 South Campbell (Avoided by Preferred Alternative)

The Berwalt Manor Apartment Building is located in the area of proposed ramps which would connect the plaza and I-75 in all of the Build Alternatives. Those configurations that split the ramps (Alternatives #4, #12 and #13, Figures 2-5 and 2-6B) had engineering shortcomings and impacts to historic resources which led to them being dropped. The layout of the ramp system of the remaining alternatives serving the plazas is controlled by interchanges to the west at Springwells Street and to the east at Clark Street. Interchange spacing limitations and ramp engineering criteria substantially restrict the degree to which the remaining interchanges serving the plaza can be shifted. Along **the south side of** Fort Street, from west to east, are the *National Register* eligible Produce Terminal, Southwestern High School, and the Detroit Savings Bank/George International Building. **Along the north side are the Michigan Bell Telephone Vinewood Dial Office Building, Motz's Burgers, Fort Street/Green Street Detroit Police Station, and the Olivet Presbyterian/Old Landmark Church of God in Christ.** Those buildings, plus a new Arvin Meritor facility (400 employees) push the ramp system to where it is positioned. So, none of the Build Alternatives which offers avoidance is considered practical. Plaza layouts farther to the east would have to be placed over a rail line, which constitutes an unacceptable security risk. **With the Preferred Alternative, additional engineering analysis found the curve in the ramp from the plaza to northbound I-75 could be changed to avoid Berwalt Manor.**

Kovacs Bar, 6982 West Jefferson Avenue (To be removed by Preferred Alternative)

Alternatives #1, #2, #3, #5, #14 and #16, **and the Preferred Alternative** would require relocation of Kovacs Bar because the proposed bridge over the Detroit River would enter the plaza at the location of Kovacs. The bridge locations cannot be moved because they are aligned to avoid major industries and geologic risks on each side of the Detroit River. With Plaza P-c and Alternatives #7, #9, and #11, avoidance might be possible (refer to Figure 2-7) because the southwest corner of the plaza area is a "buffer zone" needed to provide a space for major utilities, such as very large diameter sewers, that cannot pass under the plaza and must be routed around it. So additional engineering would be needed if the preferred alternative were #7, #9, or #11. Nonetheless, Alternatives #7, #9, and #11 held potential as avoidance alternatives. **Further discussion with owners of major utilities since the DEIS indicates that Alternatives #7, #9, and #11 cannot act as avoidance alternatives because the buffers will be required for future relocated utilities. Buildings should not be**

Figure 5-7
Use of Beard School Property
 Detroit River International Crossing Study (Avoided by the Preferred Alternative)

Alternatives #1 and #7 - 0.2 acres



Alternatives #2 and #9 - 0.2 acres



Alternatives #3 and #11 - None



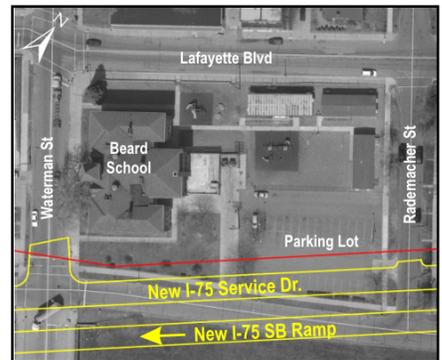
Alternative #5 - 0.1 acres



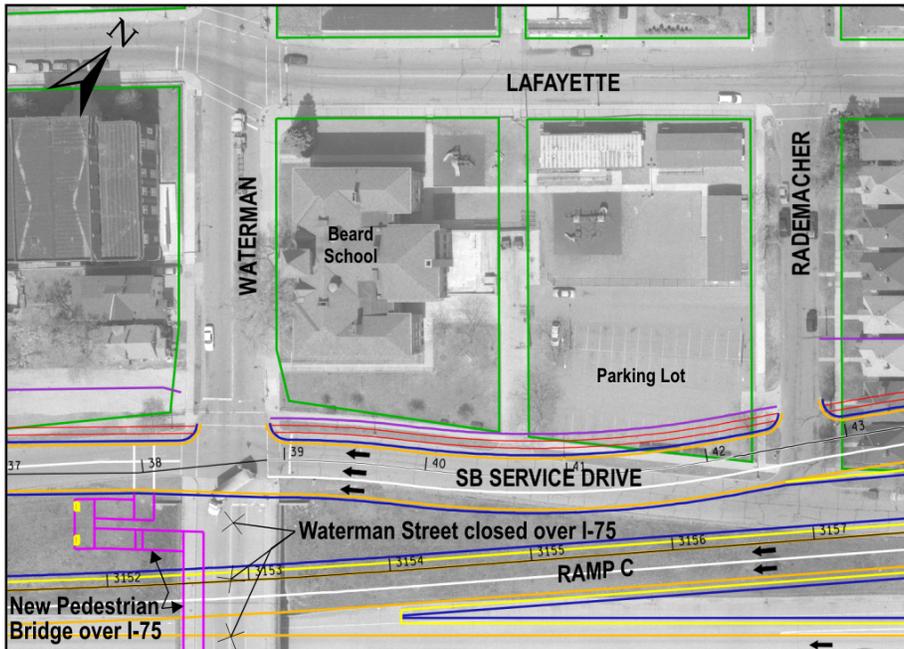
Alternative #14 - None



Alternative #16 - 0.2 acres



Preferred Alternative



Note: Parking lot not part of National Register site.

Source: The Corradino Group of Michigan, Inc.

above the utilities because the utilities must be accessible to maintenance equipment.

St. Paul African Methodist Episcopal Church, 579 South Rademacher Street (To be removed by the Preferred Alternative)

St. Paul African Methodist Episcopal Church is located in the center of the proposed plaza area with every Build Alternative, **including the Preferred Alternative**. Each would require the removal of this church. Moving the plaza to the north or east to avoid the church would require the plaza to be placed over the railroad tracks through Delray (or abandon the rail line), and relocate Southwestern High School (which is also recommended eligible for the *National Register*). These options were eliminated based on U.S. Customs objections (see Section 2.2.3). Moving the plaza to the south to avoid the church would require the plaza to encroach on Fort Wayne (which is on the *National Register*). Moving the plaza to the west to avoid the church would require the plaza to take the heart of the Delray Community including the Delray Community Historic District, the Delray Commercial Historic District, and the Detroit Fire Department Engine Company No. 29, all of which are recommended eligible for the *National Register*. None of these avoidance alternatives is considered practical.

Engine Company No. 29



Source: The Corradino Group of Michigan, Inc.

Frank Beard School, 840 North Waterman Street (Avoided by the Preferred Alternative)

The Frank Beard School (now active as the Beard Early Childhood Center), at 840 Waterman Street, is already on the *National Register*. Alternatives #1, #2, #5, #7, #9, and #16 would use land along the southbound service drive of I-75 (Figure 5-7). Land along the southbound service drive is needed for these alternatives, and a sliver of land along Waterman is also needed with Alternative #5 in order to raise the grade of Waterman to allow the ramp from the proposed plaza to southbound I-75 to pass under it. The land that would be used by Alternatives #1, #2, #5, #7, #9 and #16 is mostly used for parking and a small piece of lawn. DRIC Alternatives #3, #11 and #14 would avoid use of land of this resource. **The Preferred Alternative will require taking several parking spaces from the rear of the building from an area determined not be part of the *National Register* site.**

Detroit Savings Bank/George International Building, 5705 West Fort Street (Avoided by the Preferred Alternative)

The Detroit Savings Bank/George International Building is located in the area for the proposed northbound ramp from the plaza to I-75 under DRIC Alternative #5. The northbound ramp would connect the plaza with I-75. DRIC Alternatives #1, #2, #3, #7, #9, #11, #14, and #16 all avoid use of this property. **The Preferred Alternative also avoids it.**

5.5.2 Recreational Properties

Parks were identified early in the analysis process. These properties acted as layout “controls.” They were avoided where prudent and feasible. Avoidance alternatives (see descriptions below) were studied, but none were found practical.

South Rademacher Community Recreation Center, 6501 South Street (To be removed by Preferred Alternative)

The South Rademacher Community Recreation Center is in the center of the proposed plaza area with every Build Alternative, requiring its removal. Moving the plaza to the north to avoid the **South Rademacher Community Recreation Center** would require the plaza to be placed over the Delray rail line (or abandon the line) and relocation of Southwestern High School (which is recommended eligible for the *National Register*). These options were eliminated based on U.S. Customs objections (see Section 2.2.3). Moving the plaza to the south to avoid the Center would require the plaza to encroach on Fort Wayne (which is on the *National Register*). Moving the plaza to the west to avoid the Center would require the plaza to take the heart of the Delray Community including the proposed Delray Community Historic District, the proposed Delray Commercial Historic District, and the Detroit Fire Department Engine Company No. 29, all of which are recommended eligible for the *National Register*. None of these avoidance alternatives is considered practical.

South Rademacher Playground, 6501 South Street (To be removed by Preferred Alternative)

Each Build Alternative would require the complete taking of the South Rademacher Playground. Moving the plaza to the north and east to avoid the playground would require the plaza to be placed over the Delray rail line (or abandon it) and relocation of Southwestern High School (which is recommended eligible for the *National Register*). These options were eliminated based on U.S. Customs objections (see Section 2.2.3). Moving the plaza to the south to avoid the Playground would require the plaza to

encroach on Fort Wayne (which is on the *National Register*). Moving the plaza to the west to avoid the Playground would require the plaza to take the heart of the Delray Community including the proposed Delray Community Historic District, the proposed Delray Commercial Historic District, and the Detroit Fire Department Engine Company No. 29, all of which are recommended eligible for the *National Register*. None of these avoidance alternatives is considered practical.

Post-Jefferson Playlot, 577 South Post (To be removed by Preferred Alternative)

Each Build Alternative would require the complete taking of the Post-Jefferson Playlot. Moving the plaza to the north and east to avoid the playlot would require the plaza to be placed over the Delray rail line (or abandon it) and relocation of Southwestern High School (which is recommended eligible for the *National Register*). These options were eliminated because of U.S. Customs objections (see Section 2.2.3). Moving the plaza to the south to avoid the playlot would require the plaza to encroach on Fort Wayne (which is on the *National Register*). Moving the plaza to the west to avoid the playlot would require the plaza to take the heart of the Delray Community including the proposed Delray Community Historic District, the proposed Delray Commercial Historic District, and the Detroit Fire Department Engine Company No. 29, all of which are recommended eligible for the *National Register*. None of these avoidance alternatives is considered practical.

5.5.3 Statement of No Prudent and Feasible Alternatives

Based on the avoidance alternatives analyzed for the Kovacs Bar, the St. Paul AME Church, the South Rademacher Playground, the South Rademacher Community Recreation Center, and the Post-Jefferson Playlot, there are no prudent and feasible alternatives to the use of Section 4(f) land. There are unique problems or unusual factors involved in the use of alternatives that avoid these properties and the cost, social, economic, and environmental impacts, or community disruption resulting from such alternatives would reach extraordinary magnitudes.

5.6 Measures to Minimize Harm

When properties that are covered by Section 4(f) cannot be avoided by prudent and feasible alternatives, measures to minimize harm to those properties are considered. These measures are discussed below.

A number of measures to minimize harm apply to all sites eligible for the *National Register of Historic Places*. Prior to construction, MDOT will establish, in conjunction

with the SHPO, a permanent record of the history and current conditions of sites determined to be eligible for the *National Register*. This consultation will also guide the appropriate level of detail of the documentation. MDOT will provide original copies of the documentation with photos to the SHPO and appropriate local archives designated by the SHPO. MDOT will also work with the SHPO on other measures to minimize harm such as landscaping (see draft Memorandum of Agreement [MOA] in Appendix E).

Coordination has occurred with the Detroit Department of Recreation on how to mitigate impacts to their park/recreation sites. It is anticipated that the parks will be appraised and the City will be compensated for the property, facilities and functions. This will likely occur after the Record of Decision is signed and funding is in place.

There is no Section 4(f) use of Fort Wayne. Nonetheless, as a result of concern expressed by the City of Detroit Recreation Department (which manages Ft. Wayne), FHWA has proposed to take a number of actions to improve the context of the Fort and the public's accessibility to the Fort, as well as actions to minimize environmental impacts. These are the result of ongoing consultation among the National Park Service, the City of Detroit, the Fort Wayne Advisory Committee, the State Historic Preservation Office (SHPO), MDOT and FHWA. This consultation is reflected in the draft MOA in Appendix E.

5.7 Coordination

Effects of the proposed action, the alternatives considered, and the proposed measures to minimize harm have been reviewed by and developed in consultation with the SHPO, and discussed with property owners and representatives of the Detroit Department of Recreation. FHWA will provide information to the Advisory Council on Historic Preservation for its review and comment.

A scoping meeting was conducted on August 31, 2005 at Cobo Hall in downtown Detroit. The meeting, which was open to the public and provided the opportunity to review and comment on the scoping document prepared to guide the study process. The scoping meeting included a public comment period.

MDOT has conducted extensive owner interviews to complete the historic property inventory and has held 17 public workshops between December 2005 and August 2007. One of these workshops, held on May 9 and May 10, 2006, was to discuss cultural resources. MDOT also held 13 formal public meetings from April 2005 to December 2007. These meetings discussed topics such as Illustrative Alternatives, Practical Alternatives and impacts. All allowed for public comments and input.

In addition to the public workshops and formal public meetings, the DRIC Local Advisory Council was formed of community representatives. **It met 41 times between March 2005 and November 2008.** Each meeting was open to the public and provided for public comment.

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

Coordination with representatives of the Detroit Department of Recreation included a field review of affected properties, conference calls and correspondence. The Department of Interior, National Park Service has also been consulted in regards to historic Fort Wayne.

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

Public hearings were held March 18 and 19, 2008, to receive comments on the Draft Environmental Impact Statement/Draft Section 4(f) Evaluation. The public hearing provided an overview of the study and allowed participants the opportunity to comment either on a comment form, to a court reporter, or via the Internet. Comments were also received via email and fax. Neither the owner of Kovacs Bar nor the Pastor of St. Paul AME Church have objected to relocation and they have indicated support for the project. One St. Paul AME Church member said at the public hearing that she was upset about the project. The DEIS/Draft Section 4(f) Statement was distributed to the appropriate federal, state, and local agencies, and was made available for public review and comment from February 29 to May 29, 2008, including no fewer than 15 days before the public hearing.

Consultation with the Advisory Council on Historic Preservation resulted in a letter from that organization dated September 30, 2008, (Appendix E) stating that they need not be further consulted under 36 Code of Federal Regulations Part 800 unless the project changes or they receive a request from the SHPO or other party. They note that the effect finding for Fort Wayne must be finalized with the SHPO and that the final Memorandum of Agreement and support documentation must be filed with their office (36 CFR Part 800.6(b)(1)(iv).

5.8 Section 4(f) Conclusion

A draft Memorandum of Agreement updated since the DEIS covering Kovacs Bar and the St. Paul AME Church outlining mitigation for these properties is included in Appendix E. It will be finalized before the Record of Decision is signed.

After consideration of mitigation to these Section 4(f) resources, the Preferred Alternative is considered a prudent and feasible alternative with the least harm to these Section 4(f) resources.

In a letter dated April 29, 2008, from the Detroit International Bridge Company, Dan Stamper comments as follows: “The DEIS’s alternatives analysis is also inadequate with respect to Section 4(f) properties. ... A review of the alternatives eliminated through the EIA [Evaluation of Illustrative Alternatives] process in light of the relevant regulations demonstrates that several feasible and prudent alternatives were excluded from the DEIS’s Section 4(f) analysis. ... The Downriver and Belle Isle alternatives do not appear to be imprudent under these [FHWA regulations] criteria.”

The response to that comment is as follows.

The proposed Belle Isle Illustrative Alternative passed right by the “crown jewel” of the Detroit Parks system – Belle Isle. The impacts to Section 4(f) properties for this and the Downriver Alternatives are enumerated in the three-volume report Evaluation of Illustrative Alternative Technical Memorandum. The Downriver Alternatives all involved substantial parklands and these alternatives were not prudent and feasible and so were not carried forward as Practical Alternatives in the DEIS.

Based on the above considerations, there is no feasible and prudent alternative to the use of Kovacs Bar, the St. Paul AME Church, the South Rademacher Playground, the South Rademacher Community Recreation Center, and the Post-Jefferson Playlot and the proposed action includes all possible planning to minimize harm to these resources, resulting from such use.