

5. Draft Section 4(f) Evaluation

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 Draft 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).

- Berwalt Manor Apartment Building
- Kovacs Bar
- St. Paul African Methodist Episcopal Church
- Frank Beard School
- Detroit Savings Bank/George International Building
- South Rademacher Community Recreation Center
- South Rademacher Playground
- Post-Jefferson Playlot

At least one of the Build Alternatives would use all or parts of these properties. FHWA and MDOT have consulted with the State Historic Preservation Officer (SHPO) and the Detroit Department of Recreation on determinations of eligibility, use of these properties and measures to minimize harm. This draft Section 4(f) document was prepared for processing under the procedures set forth in FHWA regulation 23 CFR 771.135. A draft Memorandum of Agreement (MOA) is included in Appendix E. A final MOA will be developed, as appropriate, for inclusion in the FEIS.

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.

Table 5-1
Use of Potential *National Register* Eligible Cultural Resources and Recreational Resources
Detroit River International Crossing Study

Alt.	Site Name	Location	Description of Area Impacted	<i>National Register</i> Eligibility Criteria ^a	Use
#1/2/3/5/7/9/11/14/16	Berwalt Manor Apartment Building	760 Campbell Street	Historic Apartment Building	C	Area needed for all Build Alternatives will require the demolition of this property.
#1/2/3/5/7/9/11/14/16	Kovacs Bar	6892 West Jefferson Avenue	Historic Bar	A	Area needed for all Build Alternatives will require the demolition of this property.
#1/2/3/5/7/9/11/14/16	St. Paul African Methodist Episcopal Church	585 South Rademacher Street	Historic Church	A	Area needed for all Build Alternatives will require the demolition of this property.
#1/2/5/7/9/16	Frank Beard School	840 Waterman Street	Historic School	On <i>National Register</i>	All Build Alternatives, except Alternatives #3, #11 and #14, will require use of some land from the Beard School. DRIC Alternatives #1, #2, #7, #9 and #16 would use 0.2 acres and Alternative #5 would use 0.1 acre.
#5	Detroit Savings Bank/George International Building	5705 West Fort Street	Historic Bank	A + C	DRIC Alternative #5 will require the demolition of the property.
#1/2/3/5/7/9/11/14/16	South Rademacher Playground	6501 South Street	3.6 acres. Play structure and swings, a small picnic area, and a large, open field with a softball diamond and basketball court.	Not Applicable	The entire playground property is needed for the plaza under all Build Alternatives.
#1/2/3/5/7/9/11/14/16	South Rademacher Community Recreation Center	6501 South Street	14,000-square-foot building containing an arts and crafts room, games room, kitchen, weight room and gymnasium. It was one of nine recreation centers closed in Detroit, January 2, 2006.	Not Applicable	This property is needed for all Build Alternatives and will require the demolition of this property.
#1/2/3/5/7/9/11/14/16	Post-Jefferson Playlot	577 South Post	Tiny, overgrown playlot in a neighborhood of many vacant lots. It appears to be abandoned. It has few remnants of its facilities.	Not Applicable	The entire playlot property is needed for the plaza under all Build Alternatives.

^a See Section 5.3.1 for an explanation of *National Register* eligibility criteria.

Source: Commonwealth Cultural Resources Group and The Corradino Group of Michigan, Inc.

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

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

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.

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.

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 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

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.

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 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.

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

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

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.

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



Source: The Corradino Group of Michigan, 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 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

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.

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



Source: The Corradino Group of Michigan, 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 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

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.

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



Source: Commonwealth Cultural Resources Group, Inc.

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.

Primarily constructed of brick, the St. Paul AME Church stands one story tall with a raised basement and is situated

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



Source: The Corradino Group of Michigan, Inc.

perpendicular to 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.

The SHPO has requested additional information on this location. With regard to the request for additional information relative to the history of St. Paul A.M.E. Church (579 S. Rademacher), contact has been made with Pastor Baker. He has indicated he will allow us to review documents and memorabilia in his possession that should assist in making a final determination of eligibility. MDOT will continue to treat the property as NRHP eligible during this process. Pastor Baker has stated he would like to move his congregation in the near future.

Significance

The St. Paul AME Church is recommended as eligible for the NRHP under Criterion A (events). Under Criterion A, the church is significant for its association with the African Methodist Episcopal of Delray. 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

Originally this school, then located in Springwells Township, 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

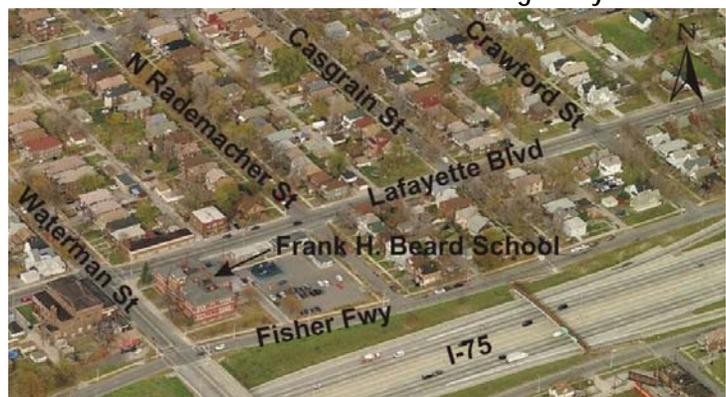
Frank H. Beard School, 8840 North Waterman Street
Detroit River International Crossing Study



Source: Commonwealth Cultural Resources Group, Inc.

Figure 5-4B

Aerial View of Frank H. Beard School
Detroit River International Crossing Study



Source: The Corradino Group of Michigan, 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.

Detroit Savings Bank/George International Building, 5705 West Fort Street

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.

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



Source: Commonwealth Cultural Resources Group, Inc.

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.

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



Source: The Corradino Group of Michigan, Inc.

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.

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.

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

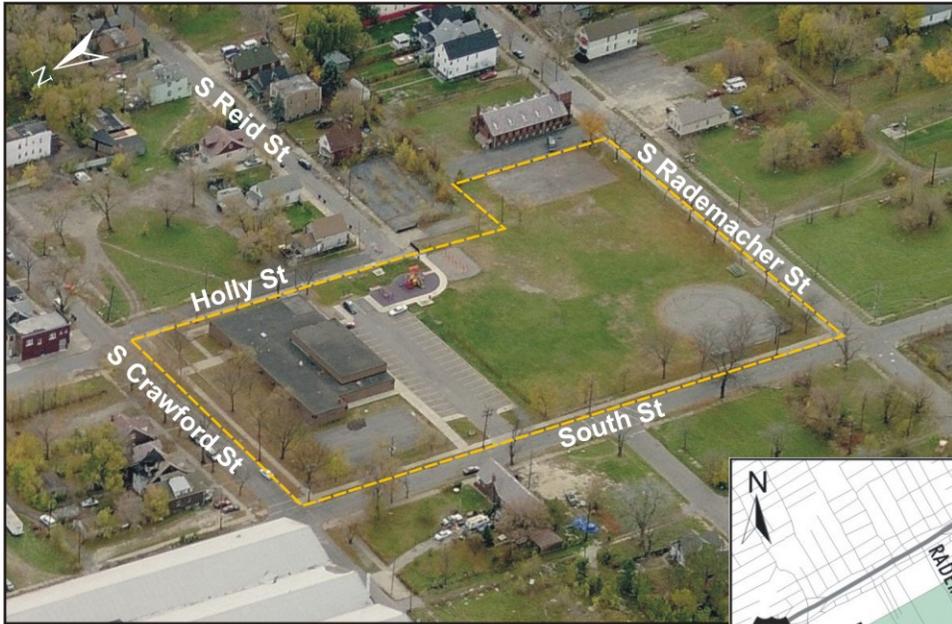
Two parks and one recreation center fall within the footprint (proposed acquisition area) of the DRIC project (Figure 5-6). The South Rademacher Playground and the South Rademacher Community Recreation Center are proposed for use under all Build Alternatives as they fall within both proposed plazas. The Post-Jefferson Playlot, falls within the west edge of the proposed plazas. These parks and recreation center are under the control 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

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.

Figure 5-6
Affected Parks
Detroit River International Crossing Study

Rademacher Park and Recreation Center



Location Map



Post-Jefferson Playlot



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

South Rademacher Playground, 6501 South Street

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

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 it be repositioned.

5.4 Impacts on the Section 4(f) Properties

The properties discussed above are expected to be used, under at least one alternative, with the project. 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 would require the removal of this property.
- Kovacs Bar at 6892 West Jefferson Avenue is located in the plaza area under every Build 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, 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 would use about 0.2 acre of school land along the southbound service drive of I-75. DRIC Alternative #5 would use about 0.1 acre of land along the southbound service drive and a sliver of land along Waterman. Most of the

land that would be used is currently parking with a small amount of lawn (see Figure 5-7). Alternatives #3, #11 and #14 would not require use of school land. No playground equipment or playlots would be used by any of the alternatives.

- 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 would require the removal of this property. The other Build Alternatives 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.
- South Rademacher Community Recreation Center at 6501 South Street would be removed by the plaza of every Build Alternative.
- Post-Jefferson Playlot at 577 South Post would be removed by the plaza of every Build Alternative. Its significance is under discussion with the Detroit Recreation Department and FHWA to determine whether it is protected by Section 4(f). Section 4(f) would not apply if both the Detroit Recreation Department and FHWA determine this site is not significant for park/recreational purposes. It is currently overgrown and appears abandoned. There is no useable play equipment. The Detroit Recreation Department's Strategic Master Plan recommends it be repositioned.

5.5 Avoidance Alternatives

Build and No Build Alternatives were considered in each corridor at the outset of the DRIC Study. The Build Alternatives include 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 in this area 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 have been carried forward for detailed study in this

DEIS. The development of alternatives and their evaluation are discussed in Section 2, “Alternatives” of this document.

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.

Berwalt Manor Apartment Building, 760 South Campbell

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 Fort Street, from west to east, are the *National Register* eligible Produce Terminal, Southwestern High School, and the Detroit Savings Bank/George International Building. 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.

Kovacs Bar, 6982 West Jefferson Avenue

Alternatives #1, #2, #3, #5, #14 and #16 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 hold potential as avoidance alternatives.

St. Paul African Methodist Episcopal Church, 579 South Rademacher Street

St. Paul African Methodist Episcopal Church is located in the center of the proposed plaza area with every Build 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

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.

Detroit Savings Bank/George International Building, 5705 West Fort Street

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.

Figure 5-7
Use of Beard School Property
Detroit River International Crossing Study

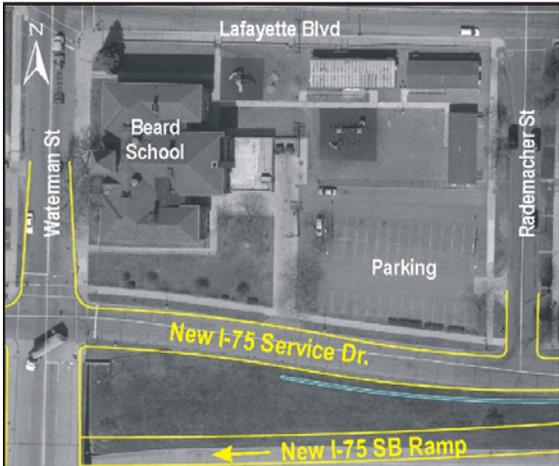
Alternatives #1 and #7 - 0.2 acres



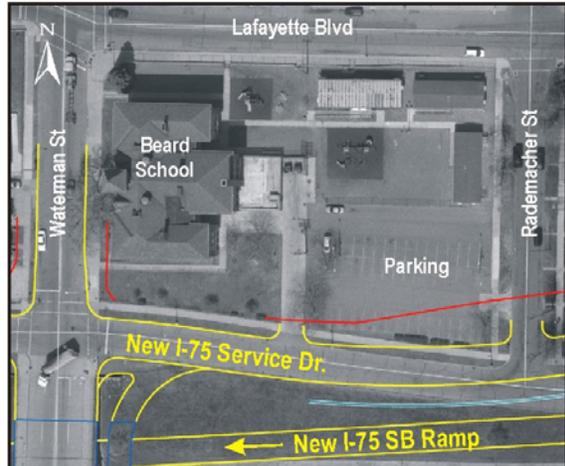
Alternatives #2 and #9 - 0.2 acres



Alternatives #3 and #11 - None



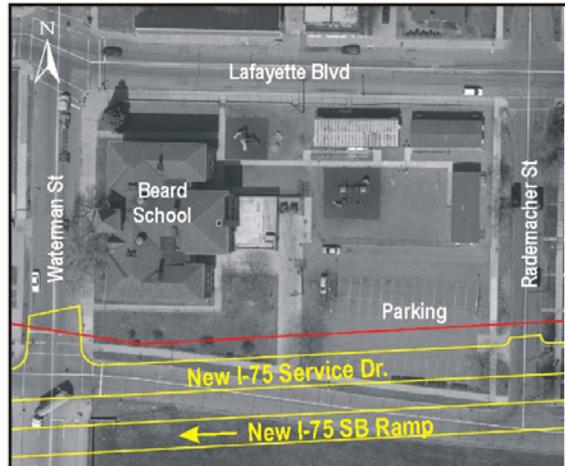
Alternative #5 - 0.1 acres



Alternative #14 - None



Alternative #16 - 0.2 acres



Source: The Corradino Group of Michigan, Inc.

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

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 Center would require the plaza to be placed over the Delray rail line (or abandon the line) and relocate 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

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 relocate 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

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 relocate 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.

5.6 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's management on how to mitigate impacts to their park/recreation sites. Possible mitigation measures could include replacement funding for new parks and/or recreation centers, funding for maintenance and/or enhancement of existing parks and/or recreation centers, and funding for reopening recreation centers that have been closed. Consultation will continue with the official with jurisdiction over the Detroit Department of Recreation to determine necessary agreements to use the park/recreation sites.

Discussion is ongoing among the U.S. Department of Interior, the City of Detroit, FHWA, MDOT and the State Historic Preservation Office to address interests in historic Fort Wayne.

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, 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 31 times between March 2005 and January 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.

A public hearing will be held after publication and distribution of the Draft Environmental Impact Statement/Draft Section 4(f) Evaluation. The public hearing will provide an overview of the study and allow participants the opportunity to comment either on a comment form, to a court reporter, or via the Internet. This document is being distributed to the appropriate federal, state, and local agencies, and will be made available for public review and comment for at least 45 days, including no fewer than 15 days before the public hearing.

