APPENDIX D. AGENCY CORRESPONDENCE

RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
LANSING

KIRK T. STEUDLE
DIRECTOR

29 September 2015

Scott Hicks, Supervisor
Fish and Wildlife Service
East Lansing Field Office
2651 Coolidge Road, Suite 101
East Lansing, Michigan 48823-6360

Dear Mr. Hicks,

The Michigan Department of Transportation, on behalf of the Federal Highway Administration, is requesting consultation under section 7 of the Endangered Species Act of 1973, as amended (Act) for the I-94 Reconstruction Project from I-96 to Connor Avenue. This project involves the removal of trees and construction of eight bridges that could provide roosting habitat for the listed Indiana Bat (IB) (*Myotis sodalis*) and Northern Long-eared Bat (NLEB) (*Myotis septentrionalis*). The Northern Long-eared Bat was listed as threatened on April 2nd, 2015 with an interim 4(d) rule.

Based upon previous discussions regarding urban land use and the recently signed programmatic approach for bridge construction between MDOT and USFWS, MDOT proposes the tree removals as "no effect" and the eight bridge replacements as "not likely to adversely affect." This proposal assumes the removal of all trees within the project corridor (see attached map) with no seasonal restrictions. The determination was made based upon the following factors:

- No wood lots or forested tracts are present within 1.0 mile of the project corridor.
- The land use is primarily urban with very little natural cover or habitat.
- The corridor supports high traffic volumes that are likely disruptive to IB and NLEB.

MDOT requests concurrence with a finding of "may affect, not likely to adversely affect" for the Indiana Bat and for the NLEB under informal conference. If you have any questions or comments, please contact me at 517-335-2633.

Sincerely,

Jeff Grabarkiewicz

CC: Lori Noblet, Patrick Marchman

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LH-LAN-0 (01/03)

United States Department of the Interior

FISH AND WILDLIFE SERVICE
East Lansing Field Office (ES)
2651 Coolidge Road, Suite 101
East Lansing, Michigan 48823-6316

IN REPLY REFER TO:

December 1, 2015

Mr. Jeff Grabarkiewicz
Environmental Services Section
Michigan Department of Transportation
P.O. Box 30050
Lansing, MI 48909

Re: I-94 Reconstruction Project

Dear Mr. Grabarkiewicz:

Thank you for your revised letter of November 17, 2015, requesting consultation under section 7 of the Endangered Species Act of 1973, as amended (Act). The Michigan Department of Transportation (MDOT) is proposing to reconstruct I-94 from I-96 to Connor Avenue in Wayne County, Michigan. Anticipated work includes the removal of trees from within the right-of-way and bridge work at 8 locations. Land use within the action area is primarily urban with no woodlots or contiguous forested tracts, little natural cover, and high traffic volumes that are likely disruptive to roosting/foraging bats.

According to your description, the trees proposed for removal and bridges to be reconstructed are potentially suitable for roosting Indiana bats (*Myotis sodalis*) and northern long-eared bats (*Myotis septentrionalis*). Based on previous discussions regarding urban land use and the recently signed programmatic approach for bridge activities between MDOT and the U.S. Fish and Wildlife Service (Service), you have determined that the proposed project is *not likely to adversely affect* the Indiana bat or northern long-eared bat and request concurrence with your determination.

Indiana Bat
In Michigan, summering Indiana bats roost in trees in riparian forests, lowland/floodplain and upland woodlands, and forested wetlands, from approximately April through October. Indiana bats may summer in a wide range of habitats, from highly altered landscapes to intact forests. Roost trees vary considerably in size, but those used by Indiana bat maternity colonies are typically greater than 9 inches dbh. Male Indiana bats have been observed roosting in trees as small as 3 inches dbh. During the winter, Indiana bats hibernate predominantly in caves and abandoned mine portals.

Northern Long-eared Bat
During the summer, northern long-eared bats (NLEB) typically roost singly or in colonies underneath bark or in cavities, crevices, or hollows of both live and dead trees (typically ≥3 inches dbh). The species has also been found roosting in structures, such as barns, sheds and bridges, occasionally. These bats roost and forage in upland and lowland woodlots, tree-lined corridors, and forested wetlands. During the winter, NLEBs hibernate predominantly in caves and abandoned mine portals.

On April 2, 2015, a final rule was published in the *Federal Register* listing the NLEB as threatened, along with an interim species-specific rule under section 4(d) of the Act, which lessens ESA restrictions that do not provide conservation benefit for the bat. Under section 7 of the Act, federal agencies must consult with the Service to ensure that any action they authorize, fund, permit or carry out does not jeopardize the existence of a listed species. This requirement does not change when a 4(d) rule is implemented; however, with a 4(d) rule in place, any actions taken by an agency that are exempted in the 4(d) rule will not require an incidental take statement in a biological opinion. The final rule for the NLEB went into effect on May 4, 2015.

Based on your project description and aerial imagery, the action area is highly urbanized and does not contain suitable habitat for Indiana bats or NLEB. Although trees and bridges within the action area may contain structural characteristics preferable to roosting bats, their isolation from forested habitat makes them unsuitable as roosts. Section 2.2 of the Federal Highway Administration (FHWA)/Federal Railroad Administration (FRA) Range-wide Programmatic Informal Consultation for Indiana Bat and NLEB states that "projects inside the range but no suitable summer habitat (e.g., high-density urban area or non-forested areas)," qualify as *no effect* with respect to the Indiana bat/NLEB. Accordingly, we expect that the proposed actions will not affect the Indiana bat or NLEB.

This precludes the need for further action on this project as required by section 7 of the Act. If the project is modified or new information about the project becomes available that indicates listed species or critical habitat may be affected in a manner or to an extent not previously considered, you should reinitiate consultation with this office.

We appreciate the opportunity to cooperate with you in conserving endangered species. If you have any questions regarding these comments, please contact Jenny Bohrman Wong, of this office, at (517) 351-7261 or Jennifer_Bohrman@fws.gov.

Sincerely,

Scott Hicks
Field Supervisor

cc: Dan Kennedy, MDNR, Wildlife Division, Lansing
Patrick Marchman, Environment and ROW Manager, FHWA, Lansing

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

AUG 14 2017

REPLY TO THE ATTENTION OF:

Patrick Marchman, Environmental Manager
Michigan Division Federal Highway Administration
315 West Allegan, Room 201
Lansing, Michigan 48933

Re: Scoping for Interstate 94 (I-94) Rehabilitation Project from East of I-94 to East of Conner Avenue, Detroit, Michigan

Dear Mr. Marchman:

The U.S. Environmental Protection Agency is responding to the Notice of Intent to prepare a Supplemental Environmental Impact Statement (SEIS) and Section 4(f) evaluation for the above-referenced project. Our comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The Michigan Department of Transportation (MDOT) is partnering with the Federal Highway Administration (FHWA) to prepare a SEIS examining impacts of modifying the approved selected alternative for the I-94 Rehabilitation Project. The approved selected alternative includes complete reconstruction of 6.7 miles of I-94 in the City of Detroit (City) between Conner Avenue and the I-96 interchange, with widening from three lanes to four lanes in each direction of travel, continuous service roads, new interchanges at M-10 and I-75 and new bridges over I-94. A Record of Decision was issued in December 2005 that allowed MDOT to begin final design and construction activities.

During Summer 2015, MDOT hosted open houses in Detroit to gather feedback from the public that was focused primarily on local neighborhood connectivity. MDOT prompted members of the Detroit Planning Department to assist in further development of connectivity improvements over the freeway, which included 2016 workshops to review changes in neighborhood mobility and future visions for city residents. The results of the 2016 workshops reflected modifications to the original EIS without expansion of freeway design footprint. Modifications were presented to the public during the Fall of 2016 at a second round of MDOT-hosted open houses in Detroit.

The proposed SEIS will analyze the effects of using local roads as local connections to the service drives and interchanges, modification of local access ramps to and from I–94, M–10 and I–75, and the addition of several vehicular and pedestrian bridges as well as non-motorized walkways/paths.

EPA's scoping response covers the following issues to aid FHWA/MDOT in preparing the SEIS: construction impacts, water management, air quality, noise, vibration, materials management, green infrastructure, and community impacts.

CONSTRUCTION IMPACTS

MDOT has previously used an Accelerated Bridge Construction (ABC) method to minimize impacts to motorist at bridge replacement sites (e.g., US-23 bridges over Barker Road and Great Lakes Central Railroad and M-50 bridge replacement). At these sites, bridge replacement was done via multiple stages to maintain several lanes of traffic during peak hours while using an ABC method called a 'bridge slide.'[1]

Recommendations: EPA recommends FHWA/MDOT discuss proposed construction measures (e.g., applicability of the 'bridge slide' technique, staging area locations, access to the worksite, etc.). In addition, impacts to motorists and the ability for proposed detour routes to handle increased traffic volumes during construction should be addressed in the SEIS.

INCREASE IN IMPERVIOUS SURFACE/WATER MANAGEMENT

The proposed project is expected to increase impervious surfaces in the study area, with associated greater volumes of stormwater runoff that need to be captured and treated. Compared to other land uses and impervious surfaces, roadway runoff tends to have higher levels of sediment, metals, salts, and deicing materials.[2] Additionally, storm events of the past several decades have been occurring with greater intensity in the Midwest.

Recommendations: EPA recommends the SEIS describe stormwater management for the project. In particular, the method(s) for collecting/treating runoff from the bridge deck that allows the first flush of road pollutants to be directed onto land where it can be filtered (e.g., bioretention, bioswales, etc.) should be addressed. EPA encourages FHWA/MDOT to design over-sized stormwater infrastructure in order to adequately handle runoff from anticipated more intensive future storm events.

AIR QUALITY, NOISE, AND VIBRATION

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

Recommendations: Refer to the enclosed document, *EPA's Construction Emission Control Checklist*, for recommendations to reduce construction-related emissions. Any resultant mitigation should be included in the Draft SEIS.

Based on a desktop review, EPA notes an educational facility (Blackwell Adult Education Center) near the project area. An often overlooked point of concern for education facilities is the impact of vibration from both construction and operation on sensitive research or procedure equipment.

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[1] A bridge slide entails building the new span next to the old span, temporarily diverting traffic onto the new span while the old span is demolished. The new span is then slid into place where the old span was previously located. The MDOT M-50 bridge replacement is the subject of a video viewable at: https://www.youtube.com/watch?v=Pa1audos1Uk.

[2] Excessive use of salting can impact surface waters and groundwater. McHenry County has a program for minimizing use of salts for de-icing. See: http://www.co.mchenry.il.us/departments/countyboard/PDFDocs/Winter%20Snow%20and%20Ice%20policy%20final.doc

Recommendations: EPA recommends FHWA/MDOT continue coordination with educational facilities regarding potential impacts from vibration from both construction and operational changes. Any resultant mitigation should be included in the Draft SEIS.

ROADSIDE VEGETATION

Public health concerns related to near-road air quality are an important environmental issue, given the increasing number of studies linking adverse health effects to populations spending significant amounts of time near high-traffic roads.[3] Research indicates that roadways generally influence air quality about 500-600 feet downwind, particularly roads with significant truck traffic or rail activity. Properly-designed vegetation barriers can be used to reduce near-road air pollution, either alone or in combination with solid noise barriers. In addition to air quality benefits, roadside vegetation can also improve aesthetics, increase property values, reduce heat, control surface water runoff, and reduce noise pollution. Design considerations are not dissimilar to standard roadside vegetation planning, but have a heightened focus on improving air quality.

Recommendations: EPA recommends FHWA/MDOT identify locations for properly-designed roadside vegetation along the project area; native vegetation should be considered for locations with and without noise barriers. We recommend considering whether locations where sensitive receptors live, work, and play (e.g., schools, childcare centers, hospitals, elder-care facilities, neighborhoods) might especially benefit from a vegetated buffer. Additional details can be found in EPA's *Recommendations for Constructing Roadside Vegetation Barriers to Improve Near-Road Air Quality*[4] and *Near Roadway Air Pollution and Health: Frequently Asked Questions.*[5] Refer to the enclosed document, *EPA's Roadside Vegetation Checklist,* for recommendations to include roadside vegetation planning. Any resultant mitigation should be included in the Draft SEIS.

MATERIALS MANAGEMENT AND GREEN INFRASTRUCTURE

Existing bridges that will be replaced with wider structures may have been painted with a lead-based paint.

Recommendations: EPA recommends the SEIS address whether lead-based paint was used on any of the bridges slated for replacement. If so, we recommend measures designed to protect workers from potential health impacts are included in the SEIS (e.g., air quality analyses near residences).

It's reasonable to assume that proposed modifications will result in materials removal from the project site, as access improvements, bridge and interchange modifications and other features are reconfigured. Reuse of materials may provide both an environmental benefit as well as an economic (by lowering project cost) benefit.

Recommendations: If feasible, we recommend FHWA/MDOT include a sustainable materials management plan, which includes potential reuse (either within the project area or elsewhere) of materials removed from the project area. Also see EPA's website on sustainable materials management.[6]

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

[4] https://cfpub.epa.gov/si/si_public_file_download.cfm?p_download_id=528612

[5] https://www.epa.gov/air-research/near-roadway-air-pollution-and-health-frequent-questions

[6] https://www.epa.gov/smm/sustainable-management-construction-and-demolition-materials

Green infrastructure includes elements of the natural environment (green space, aquatic features, natural corridors, tree canopy, etc.), as well as elements of the constructed environment (green roofs, bioswales, permeable pavements, vegetated medians, rain and community gardens, etc.), which contribute to environmental quality, healthy communities, reduced long-term maintenance costs, and economic value. The scoping materials did not address if green infrastructure will be one of the features of the proposed project. If feasible, we recommend FHWA/MDOT include green infrastructure, including, but not limited to, green space in the right-of-way to increase infiltration, permeable sidewalks and parking lots, and vegetated spaces. We recognize this information may not be known until later in the design process; however, we recommend providing as much detail as available at this time.

Recommendations: We recommend considering both low-growing, native prairie plantings and trees in any proposed green medians and other available rights-of-way. As local access is improved, we also recommend bump-outs with vegetation, which serve a second purpose of traffic calming. The Draft EA should identify whether (and where) permeable pavement can be used in sidewalks, pedestrian crossings, and auxiliary facilities.

We also recommend FHWA/MDOT continue to work with the City, businesses, and local communities to comprehensively plan for green infrastructure adjacent to the project area, particularly where an alternative yields new space for redevelopment. For additional information regarding communities' cost savings through their green infrastructure programs and useful tools to inform a cost-benefit analysis for the proposed project, visit: https://www.epa.gov/green-infrastructure/green-infrastructure-cost-benefit-resources.

COMMUNITY IMPACTS

EPA commends FHWA/MDOT for including active transportation (pedestrian bridges and non-motorized walkways/paths to access public and community resources) as part of the project's goals.

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

Recommendations: EPA recommends the SEIS describe FHWA/MDOT's EJ methodology, including meaningful public engagement in the project area (e.g., with linguistically-isolated households). We recommend considering the guiding principles and steps in the EJ Interagency Working Group's *Promising Practices for EJ Methodologies in NEPA Reviews.*[7]

EJSCREEN indicates approximately seven percent of the population in the project area consists of children under the age of five. Children may be more highly exposed to contaminants because they generally eat more food, drink more water, and have higher inhalation rates relative to their size. Children may be more vulnerable to the toxic effects of contaminants because their bodies and systems are not fully developed and their growing organs are more easily harmed.

Recommendations: EPA recommends including an analysis of impacts to children as a result of the proposed action. The SEIS should characterize and address children's exposures and

[7] https://www.epa.gov/environmentaljustice/ej-iwg-promising-practices-ej-methodologies-nepa-reviews

susceptibilities to the pollutants of concern, which could include, but are not limited to, the following:

- **Identification of the pollutants and sources of concern:** There are various sources of information to identify pollutants of potential concern and the resultant nature of the specific concerns (such as neurotoxicity, respiratory effects, carcinogenicity, etc.). One such source is EPA's America's Children and the Environment Report,[8] 3rd Edition, which provides useful information about such pollutants, including criteria air pollutants and hazardous air pollutants, contaminants in indoor environments, and others.
- **Exposure Assessment:** Describe demographic characteristics of affected neighborhoods/populations/communities and focus exposure assessments on schools, recreation areas, childcare centers, parks, and residential areas in close proximity (within ½ mile) to the proposed project, and other areas of apparent frequent and/or prolonged exposure.
- **Baseline health conditions:** Consider analyzing available relevant health data for the impacted communities. In some localities, community or census tract data may be available for indicators such as lead screening rates, number of children with elevated blood lead levels, age of housing, asthma emergency room visits and hospitalizations rates, etc. Consultation with public health officials is an appropriate way to identify and access relevant data.
- **Respiratory Impacts/Asthma:** To the extent possible, consider data on existing asthma rates and asthma severity among children and the general community living, working, playing, and attending school and childcare facilities near the project site.
- **Noise and Vibration:** Consider impacts from noise on health and learning, especially near the Hospital, homes, schools, and childcare centers. Mitigation may include limiting noise and vibration-inducing activities to times when fewer children are present (such as outside of school hours).
- **Air Pollutant Emissions:** Consider exposure and impacts to children from mobile source air pollutants, including proximity to transportation corridors, transportation hubs, ports, and project construction emissions. Combine these with other area sources/baseline air quality. Mitigation may include outreach to impacted communities concerning how to reduce exposure (such as staying indoors or keeping windows closed).
- **Other Chemical or Physical Exposures:** Consider impacts to children from other site activities, such as pesticide application, demolition, construction traffic, etc.

BEST MANAGEMENT PRACTICES

EPA recommends BMPs typically employed to minimize construction impacts to air quality, water resources, soil, and other resources for this type of project are included in the SEIS (e.g., installing erosion blankets or silt fences over unprotected finished grades; keeping excavated areas properly wetted; planning truck routes to minimize disturbances to the surrounding community, particularly places where children congregate, etc.). We recognize this information may not be finalized until later in the design process; however, we recommend providing as much detail as possible in the SEIS to inform reviewers of actions typically taken to avoid or minimize impacts.

[8] http://www.epa.gov/envirohealth/children/

EPA'S ENVIRONMENTAL DATABASES

The following databases can be accessed by FHWA/MDOT to obtain environmental information pertaining to the project area.

- EnviroMapper[9]: https://www.epa.gov/waterdata/waters-watershed-assessment-tracking-environmental-results-system
- Envirofacts[10]: https://www3.epa.gov/enviro/facts/multisystem.html
- EJSCREEN: https://www.epa.gov/ejscreen
- NEPAssist: https://www.epa.gov/nepa/nepassist
- 303(3) Listed Impaired Waters: https://www.epa.gov/exposure-assessment-models/303d-listed-impaired-waters
- National Ambient Air Quality Standards: http://www.epa.state.oh.us/dapc/general/naaqs.aspx

Enclosed is a NEPAssist report for the I-94 project area with a buffer area of approximately 100 feet.

EPA commends the project team for identifying a holistic purpose and need that encompasses community needs in addition to transportation needs.

Thank you in advance for your consideration of our comments. Please send us a copy of the SEIS once it becomes available. If you have any questions, please do not hesitate to call me or Kathy Kowal of my staff at 312-353-5206 or kowal.kathleen@epa.gov.

Sincerely,

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

Enclosures: Construction Emissions Reduction Checklist
Roadside Vegetation Considerations
NEPAssist Report

Cc: Janet Attarian, City of Detroit

[9] The **Watershed Assessment, Tracking & Environmental Results System (WATERS)** unites water quality information previously available only from several independent and unconnected databases.
[10] Includes enforcement and compliance information.

U.S. Environmental Protection Agency
Construction Emission Control Checklist

EPA recognizes that the project area is located in an attainment area for criteria pollutants. Diesel emissions and fugitive dust from project construction may pose environmental and human health risks and should be minimized. In 2002, EPA classified diesel emissions as a likely human carcinogen, and in 2012 the International Agency for Research on Cancer concluded that diesel exhaust is carcinogenic to humans. Acute exposures can lead to other health problems, such as eye and nose irritation, headaches, nausea, asthma, and other respiratory system issues. Longer term exposure may worsen heart and lung disease.[1] We recommend that the Federal Aviation Administration consider the following protective measures and commit to applicable measures in the Finding of No Significant Impact.

Mobile and Stationary Source Diesel Controls

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

- On-Highway Vehicles: On-highway vehicles should meet, or exceed, the EPA exhaust emissions standards for model year 2010 and newer heavy-duty, on-highway compression-ignition engines (e.g., long-haul trucks, refuse haulers, shuttle buses, etc.).[2]
- Non-road Vehicles and Equipment: Non-road vehicles and equipment should meet, or exceed, the EPA Tier 4 exhaust emissions standards for heavy-duty, non-road compression-ignition engines (e.g., construction equipment, non-road trucks, etc.).[3]
- Low Emission Equipment Exemptions: The equipment specifications outlined above should be met unless: 1) a piece of specialized equipment is not available for purchase or lease within the United States; or 2) the relevant project contractor has been awarded funds to retrofit existing equipment, or purchase/lease new equipment, but the funds are not yet available.

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

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

[1] https://www3.epa.gov/region1/eco/diesel/health_effects.html
[2] http://www.epa.gov/otaq/standards/heavy-duty/hdci-exhaust.htm
[3] http://www.epa.gov/otaq/standards/nonroad/nonroadci.htm

marketplace of pre-2010 model year on-highway vehicles (e.g., scrappage rebates) and replace them with newer vehicles that meet or exceed the latest EPA exhaust emissions standards.

Fugitive Dust Source Controls

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative, where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.
- Install wind fencing and phase grading operations where appropriate, and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

Occupational Health

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

U.S. Environmental Protection Agency
Roadside Vegetation Considerations

- **Distance**: Vegetated barriers should be considered where communities are located close to corridors – about 500-600 feet downwind from the corridor.
- **Height**: Vegetated barriers should be five meters or higher or extend one meter above the solid barrier. The higher the vegetated barrier, the greater the pollutant reductions.
- **Thickness**: Vegetated barriers should be ten meters or more thick. The thicker the vegetative barrier, the greater the pollutant reductions. Gaps in the thickness should be avoided. Consider multiple rows of different types of vegetation (bushes, shrubs, and trees).
- **Porosity**: Porosity should not be too high, which would allow pollutants to easily pass through the barrier or cause wind stagnation. If porosity is too low, the vegetated buffer will perform like a solid barrier, limiting the amount of particulate removal.
- **Length**: Extending the barrier 50 meters or more beyond the area of concern protects against pollutants meandering around edges.
- **Seasonal effects**: Select species that are less subject to seasonal changes, such as coniferous species,
- **Leaf surface**: Leaf surfaces with complex waxy and/or hairy surfaces with high surface area will capture and contain more particulate pollutants.
- **Air emissions**: Vegetation used should not be a source of air pollution (some vegetation can produce volatile organic compounds, enhance formation of ozone, or generate high-allergy pollens).
- **Pollution and stress resistant**: Vegetation should be able to survive and maintain integrity under the high pollution levels and stress that can occur near roads (e.g., salt during winter).
- **Maintenance**: Proper maintenance of vegetation must be provided in order for the barrier to survive and maintain its integrity.
- **Water runoff**: Roadside vegetative barriers constructed appropriately can provide an added benefit of controlling and containing surface water runoff (which can also improve local water quality).
- **Drought and flood resistance**: A vegetative barrier must maintain its integrity under cycles of drought and flooding in order to provide effective pollution reductions.
- **Native, non-invasive species**: Use of native, non-invasive species will ensure effective pollutant reductions without potential unintended consequences.
- **Non-poisonous**: Choose non-poisonous species if sensitive populations will be nearby.
- **Roadway safety**: Prior to planting, ensure vegetation plan will meet safety requirements for drivers on the road and will conform to local safety and permit requirements, while avoiding potential wildlife/auto accidents.

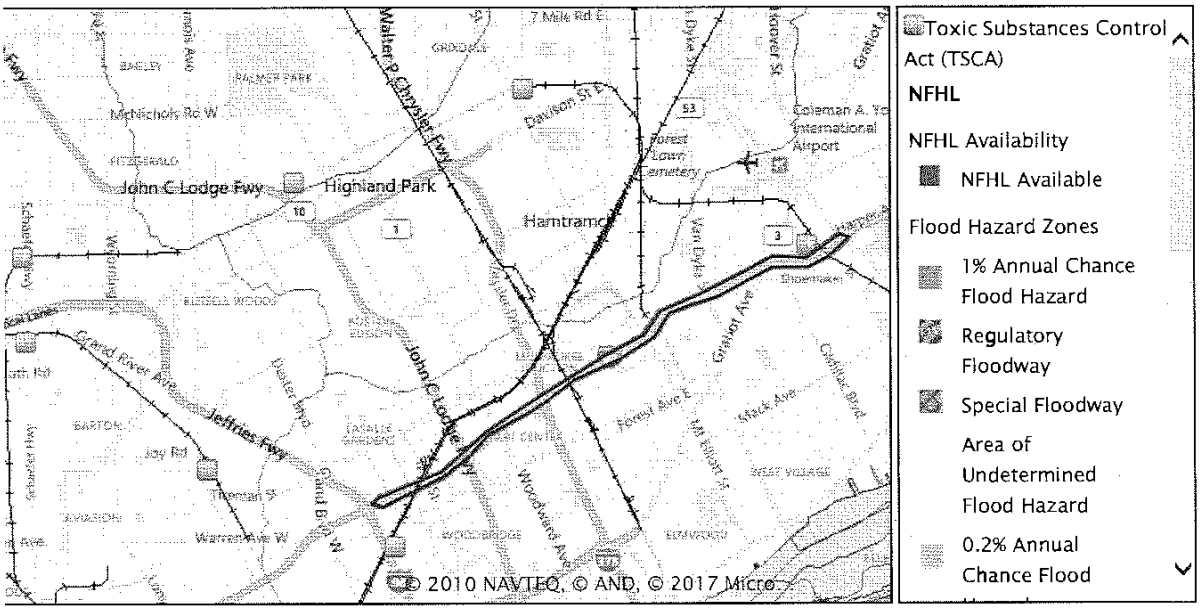
NEPAssist

Home | Help

US Environmental Protection Agency

I-94 rehab

Map



Geographic coordinates:

POLYGON (42.352078,-83.095775,42.356427,-83.081551,42.363072,-83.071417,42.369232,-83.058664,42.376116,-83.043460,42.379619,-83.034468,42.383724,-83.030707,42.386503,-83.021552,42.390728,-83.009945,42.393023,-83.004060,42.392781,-82.996375,42.397006,-
with buffer 100 feet

Note: The information in the following reports is based on publicly available databases and web services. The National Report uses nationally available datasets and the State Reports use datasets available through the EPA Regions. Click on the hyperlinked question to view the data source and associated metadata.

National Report

Project Area	0.55 sq mi
Within 100 feet of an Ozone 8-hr (1997 standard) nonattainment/maintenance area?	yes
Within 100 feet of an Ozone 8-hr (2008 standard) nonattainment/maintenance area?	no
Within 100 feet of a Lead (2008 standard) nonattainment/maintenance area?	no
Within 100 feet of a SO2 1-hr (2010 standard) nonattainment/maintenance area?	no
Within 100 feet of a PM2.5 24hr (2006 standard) nonattainment/maintenance area?	yes
Within 100 feet of a PM2.5 Annual (1997 standard) nonattainment/maintenance area?	yes
Within 100 feet of a PM2.5 Annual (2012 standard) nonattainment/maintenance area?	no
Within 100 feet of a PM10 (1987 standard) nonattainment/maintenance area?	no
Within 100 feet of a Federal Land?	no
Within 100 feet of an impaired stream?	no
Within 100 feet of an impaired waterbody?	no
Within 100 feet of a waterbody?	no
Within 100 feet of a stream?	no

Within 100 feet of an NWI wetland?	loading... ***May take several minutes***
Within 100 feet of a Brownfields site?	no
Within 100 feet of a Superfund site?	no
Within 100 feet of a Toxic Release Inventory (TRI) site?	no
Within 100 feet of a water discharger (NPDES)?	no
Within 100 feet of a hazardous waste (RCRA) facility?	yes
Within 100 feet of an air emission facility?	no
Within 100 feet of a school?	yes
Within 100 feet of an airport?	no
Within 100 feet of a hospital?	no
Within 100 feet of a designated sole source aquifer?	no
Within 100 feet of a historic property on the National Register of Historic Places?	no
Within 100 feet of a Toxic Substances Control Act (TSCA) site?	no
Within 100 feet of a RADInfo site?	no

Save to Excel | Save as PDF

Michigan Report

Within 100 feet of the Great Lakes basin?	yes
Within 100 feet of Managed Natural Resources Area(s)?	no
Within 100 feet of an American Heritage River?	no
Within 100 feet of a RCRA 2020 facility?	no

Demographic Reports

Note: The demographic reports are provided by EJSCREEN. The reports are generated based on your project area and buffer. For more information, visit the EJSCREEN website.

2010-2014 ACS Summary Report

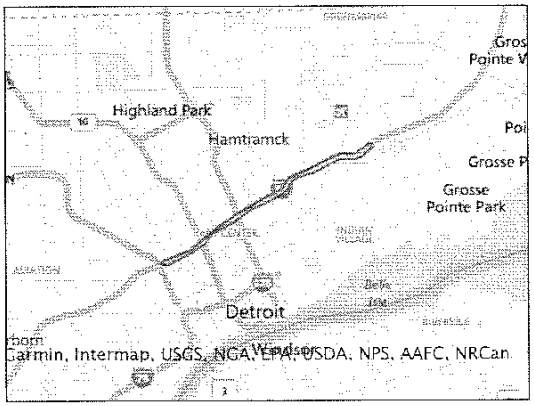
Census 2010 Summary (SF1)

USFWS IPaC Report

NEPAssist

Home | Help

US Environmental Protection Agency



Report question: ***Within 100 feet of a school?*** **yes**

Modify question by entering a new buffer distance and unit for the selected study area:

100 feet Submit Query

Features within Study Area

Features found: 1

Name	Distance	Units
Blackwell Adult Education Center	55.41	feet

EJSCREEN ACS Summary Report

Location: User-specified polygonal location
Ring (buffer): 100-feet radius
Description: I-94 rehab

Summary of ACS Estimates	2010 - 2014
Population	765
Population Density (per sq. mile)	1,270
Minority Population	667
% Minority	87%
Households	235
Housing Units	408
Housing Units Built Before 1950	316
Per Capita Income	13,126
Land Area (sq. miles) (Source: SF1)	0.60
% Land Area	99%
Water Area (sq. miles) (Source: SF1)	0.00
% Water Area	1%

	2010 - 2014 ACS Estimates	Percent	MOE (±)
Population by Race			
Total	765	100%	858
Population Reporting One Race	749	98%	1,377
White	102	13%	273
Black	639	84%	858
American Indian	2	0%	19
Asian	4	0%	182
Pacific Islander	0	0%	10
Some Other Race	1	0%	35
Population Reporting Two or More Races	16	2%	118
Total Hispanic Population	5	1%	79
Total Non-Hispanic Population	760		
White Alone	98	13%	273
Black Alone	639	84%	858
American Indian Alone	2	0%	19
Non-Hispanic Asian Alone	4	0%	182
Pacific Islander Alone	0	0%	10
Other Race Alone	0	0%	34
Two or More Races Alone	16	2%	118
Population by Sex			
Male	371	49%	620
Female	394	51%	289
Population by Age			
Age 0-4	53	7%	155
Age 0-17	144	19%	269
Age 18+	621	81%	310
Age 65+	114	15%	93

Data Note: Detail may not sum to totals due to rounding. Hispanic population can be of any race. N/A means not available.
Source: U.S. Census Bureau, American Community Survey (ACS) 2010 - 2014.

EJSCREEN ACS Summary Report

Location: User-specified polygonal location
Ring (buffer): 100-feet radius
Description: I-94 rehab

	2010 - 2014 ACS Estimates	Percent	MOE (±)
Population 25+ by Educational Attainment			
Total	542	100%	249
Less than 9th Grade	40	7%	101
9th - 12th Grade, No Diploma	105	19%	132
High School Graduate	206	38%	127
Some College, No Degree	139	26%	125
Associate Degree	25	5%	55
Bachelor's Degree or more	52	10%	172
Population Age 5+ Years by Ability to Speak English			
Total	712	100%	723
Speak only English	697	98%	523
Non-English at Home[1+2+3+4]	15	2%	143
[1]Speak English "very well"	14	2%	128
[2]Speak English "well"	0	0%	43
[3]Speak English "not well"	0	0%	34
[4]Speak English "not at all"	1	0%	40
[3+4]Speak English "less than well"	1	0%	51
[2+3+4]Speak English "less than very well"	1	0%	66
Linguistically Isolated Households*			
Total	0	0%	41
Speak Spanish	0	0%	10
Speak Other Indo-European Languages	0	0%	14
Speak Asian-Pacific Island Languages	0	0%	40
Speak Other Languages	0	0%	10
Households by Household Income			
Household Income Base	235	100%	116
< $15,000	94	40%	113
$15,000 - $25,000	36	15%	90
$25,000 - $50,000	56	24%	94
$50,000 - $75,000	26	11%	80
$75,000 +	24	10%	76
Occupied Housing Units by Tenure			
Total	235	100%	116
Owner Occupied	99	42%	77
Renter Occupied	137	58%	107
Employed Population Age 16+ Years			
Total	636	100%	411
In Labor Force	300	47%	287
Civilian Unemployed in Labor Force	118	19%	117
Not In Labor Force	336	53%	316

Data Note: Detail may not sum to totals due to rounding. Hispanic population can be of any race. N/A means not available. Source: U.S. Census Bureau, American Community Survey (ACS) 2010 - 2014.

*Households in which no one 14 and over speaks English "very well" or speaks English only.

EJSCREEN ACS Summary Report

Location: User-specified polygonal location
Ring (buffer): 100-feet radius
Description: I-94 rehab

	2010 - 2014 ACS Estimates	Percent	MOE (±)
Population by Language Spoken at Home*			
Total (persons age 5 and above)	712	100%	723
English	N/A	N/A	N/A
Spanish	N/A	N/A	N/A
French	N/A	N/A	N/A
French Creole	N/A	N/A	N/A
Italian	N/A	N/A	N/A
Portuguese	N/A	N/A	N/A
German	N/A	N/A	N/A
Yiddish	N/A	N/A	N/A
Other West Germanic	N/A	N/A	N/A
Scandinavian	N/A	N/A	N/A
Greek	N/A	N/A	N/A
Russian	N/A	N/A	N/A
Polish	N/A	N/A	N/A
Serbo-Croatian	N/A	N/A	N/A
Other Slavic	N/A	N/A	N/A
Armenian	N/A	N/A	N/A
Persian	N/A	N/A	N/A
Gujarathi	N/A	N/A	N/A
Hindi	N/A	N/A	N/A
Urdu	N/A	N/A	N/A
Other Indic	N/A	N/A	N/A
Other Indo-European	N/A	N/A	N/A
Chinese	N/A	N/A	N/A
Japanese	N/A	N/A	N/A
Korean	N/A	N/A	N/A
Mon-Khmer, Cambodian	N/A	N/A	N/A
Hmong	N/A	N/A	N/A
Thai	N/A	N/A	N/A
Laotian	N/A	N/A	N/A
Vietnamese	N/A	N/A	N/A
Other Asian	N/A	N/A	N/A
Tagalog	N/A	N/A	N/A
Other Pacific Island	N/A	N/A	N/A
Navajo	N/A	N/A	N/A
Other Native American	N/A	N/A	N/A
Hungarian	N/A	N/A	N/A
Arabic	N/A	N/A	N/A
Hebrew	N/A	N/A	N/A
African	N/A	N/A	N/A
Other and non-specified	N/A	N/A	N/A
Total Non-English	N/A	N/A	N/A

Data Note: Detail may not sum to totals due to rounding. Hispanic population can be of any race. N/A means not available. **Source:** U.S. Census Bureau, American Community Survey (ACS) 2010 - 2014.
*Population by Language Spoken at Home is available at the census tract summary level and up.

EJSCREEN Census 2010 Summary Report

Location: User-specified polygonal location
Ring (buffer): 100-feet radius
Description: I-94 rehab

Summary	Census 2010
Population	899
Population Density (per sq. mile)	1,492
Minority Population	831
% Minority	92%
Households	272
Housing Units	373
Land Area (sq. miles)	0.60
% Land Area	100%
Water Area (sq. miles)	0.00
% Water Area	0%

Population by Race	Number	Percent
Total	899	------
Population Reporting One Race	888	99%
White	72	8%
Black	805	90%
American Indian	6	1%
Asian	2	0%
Pacific Islander	0	0%
Some Other Race	3	0%
Population Reporting Two or More Races	11	1%
Total Hispanic Population	12	1%
Total Non-Hispanic Population	887	99%
White Alone	68	8%
Black Alone	801	89%
American Indian Alone	5	1%
Non-Hispanic Asian Alone	2	0%
Pacific Islander Alone	0	0%
Other Race Alone	1	0%
Two or More Races Alone	10	1%

Population by Sex	Number	Percent
Male	481	54%
Female	418	46%

Population by Age	Number	Percent
Age 0-4	54	6%
Age 0-17	191	21%
Age 18+	708	79%
Age 65+	123	14%

Households by Tenure	Number	Percent
Total	272	
Owner Occupied	130	48%
Renter Occupied	142	52%

Data Note: Detail may not sum to totals due to rounding. Hispanic population can be of any race.
Source: U.S. Census Bureau, Census 2010 Summary File 1.

1/1

From:	Pauly, Ralph
To:	Connie White
Cc:	Noblet, Lori (MDOT); Stepanski, Terry (MDOT)
Subject:	FW: I-94 Detroit Modernization Supplemental Environmental Impact Statement Invitation to become a Cooperating or Participating Agency
Date:	Tuesday, May 8, 2018 9:56:28 AM

For your records.

From: Ciavarella, Jason (FTA)
Sent: Tuesday, May 8, 2018 10:24 AM
To: Pauly, Ralph <Ralph.Pauly@dot.gov>
Cc: Marchman, Patrick (FHWA) <patrick.marchman@dot.gov>; Breiseth, Elizabeth (FTA) <elizabeth.breiseth@dot.gov>
Subject: RE: I-94 Detroit Modernization Supplemental Environmental Impact Statement Invitation to become a Cooperating or Participating Agency

Hi Ralph,

Thank you again for the invitation. We really appreciate you reaching out to us on this exciting project. However, due to some staffing shortages at the moment, we are going to decline participation.

Thanks again,
Jay

From: Pauly, Ralph
Sent: Tuesday, May 08, 2018 5:25 AM
To: Ciavarella, Jason (FTA) <jason.ciavarella@dot.gov>
Cc: Marchman, Patrick (FHWA) <patrick.marchman@dot.gov>
Subject: RE: I-94 Detroit Modernization Supplemental Environmental Impact Statement Invitation to become a Cooperating or Participating Agency

Good Morning Jay,

Thank you for your inquiry. The purpose of the project is to improve local connectivity, capacity and the condition of the existing I-94 roadway, service drives, bridges and interchanges between I-96 and Conner Avenue.

The scope of work includes the complete reconstruction of 6.7 miles of I-94 in the City of Detroit, widening I-94 from three lanes to four lanes in each direction. The project will also include reconstruction/modification of the existing service drives/local roadways, the reconstruction of I-94 interchanges at M-10 and I-75, the removal and/or replacement of several bridges over I-94 and the construction of a new drainage system.

The proposed improvements will take into consideration all existing transit routes, as well as future

routes proposed by the regional transit authority.

Please feel free to contact me by phone or email if you require additional information.

Thank you,

Ralph Pauly, PE
Assistant Structures Engineer
U.S. Department of Transportation
Federal Highway Administration
315 W. Allegan Street, Room 201
Lansing, MI 48933
Phone: 517-702-1822
Fax: 517-377-1804
Email: Ralph.Pauly@dot.gov

From: Ciavarella, Jason (FTA)
Sent: Thursday, May 3, 2018 5:07 PM
To: FHWA, Michigan (FHWA) <Michigan.FHWA@dot.gov>
Subject: RE: I-94 Detroit Modernization Supplemental Environmental Impact Statement Invitation to become a Cooperating or Participating Agency

Good Afternoon,

Thank you for your letter. Would it be possible to obtain a bit more information on the scope of the work, particularly as it relates to transit? This would help the FTA determine the suitability of becoming a Cooperating or Participating Agency in this effort.

Thanks,
Jay

From: FHWA, Michigan (FHWA)
Sent: Wednesday, May 02, 2018 1:33 PM
To: Ciavarella, Jason (FTA) <jason.ciavarella@dot.gov>
Cc: Breiseth, Elizabeth (FTA) <elizabeth.breiseth@dot.gov>; Lewis, Mark (FHWA) <mark.lewis@dot.gov>; Ivey, Mike (FHWA) <Mike.Ivey@dot.gov>; Burch, Theodore (FHWA) <Theodore.Burch@dot.gov>; Jorgenson, Russell (FHWA) <Russell.Jorgenson@dot.gov>; Pauly, Ralph <Ralph.Pauly@dot.gov>; Marchman, Patrick (FHWA) <patrick.marchman@dot.gov>
Subject: I-94 Detroit Modernization Supplemental Environmental Impact Statement Invitation to become a Cooperating or Participating Agency

Mr. Hicks:

Please reference the attached letter; the electronic correspondence will remain on file with the Michigan Division.

Thank you,

FHWA – Michigan Division
315. W Allegan, Room 201
Lansing MI 48933
Sent by: JMM

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

MAY 3 0 2018

REPLY TO THE ATTENTION OF

Russell L. Jorgenson, P.E.
Division Administrator
U.S. Department of Transportation
Federal Highway Administration, Michigan Division
315 West Allegan Street, Room 201
Lansing, Michigan 48933

RE: Cooperating Agency Invitation for I-94 Detroit Modernization Supplemental Environmental Impact Statement, Detroit, Wayne County, Michigan

Dear Mr. Jorgenson:

EPA is confirming our role as a cooperating agency under the National Environmental Policy Act (NEPA) in the environmental review process for the above-referenced project. The U.S. Department of Transportation, Federal Highway Administration, Michigan Division (FHWA) is developing a Supplemental Environmental Impact Statement (EIS) under NEPA.

In 2004, FHWA and the Michigan Department of Transportation (MDOT) prepared a Final EIS to analyze plans to reconstruct I-94 in Detroit, and in 2005 FHWA issued a Record of Decision (ROD) that approved the reconstruction of a 6.7-mile segment of the highway from east of the I-96 interchange to east of the Conner Avenue interchange. Subsequent to the issuance of the ROD, MDOT continued to solicit public and stakeholder comments to lower the impact of the project and to create a design that fits within the context of adjacent neighborhoods. Through an inclusive public engagement program, the modernization of I-94 will be the subject of the Supplemental EIS.

EPA agrees to be a cooperating agency under NEPA for this project as staff time and resources allow. As a cooperating agency, EPA will provide project-related input in areas of our expertise. We will provide input on impact assessment methodologies; participate in coordination meetings, webinars/conference calls, and field visits; and provide comments on preliminary information developed for the EIS, including the administrative draft of the Draft EIS. Specifically, we plan to provide information on project purpose and need, alternatives considered and the range of alternatives to be carried forward, anticipated impacts, and mitigation. We do not, however, commit to assume any responsibility for developing information or preparing any environmental analyses, including authoring any portions of future NEPA documents. EPA retains its independent review and comment function for NEPA documents under Section 309 of

the Clean Air Act. During the formal NEPA document comment periods, we will submit comments on this project.

We request that EPA be provided with at least a two-week notice of all meetings, webinars/conference calls, and receipt of documents for our review regarding this project. In addition, we request that all project information for our review be sent to us in both hardcopy and CD format.

We look forward to working with you as a cooperating agency and reviewing future NEPA documents prepared for this project. Kathy Kowal of my staff will be EPA's lead NEPA reviewer for this project. If you have any questions about this letter, she may be reached at 312-353-5206 or via email at kowal.kathleen@epa.gov.

Sincerely,

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

cc: Patrick Marchman, FHWA
Hal Zweng, MDOT

STATE OF MICHIGAN

RICK SNYDER
GOVERNOR

MICHIGAN STATE HOUSING DEVELOPMENT AUTHORITY
LANSING

EARL J. POLESKI
EXECUTIVE DIRECTOR

June 6, 2018

Michigan Department of Transportation
Attn: Terry A Stepanski, PE, Senior Project Manager
Murray D. Van Wagoner Building
P.O. Box 30050
Lansing, Michigan 48909

Dear Mr. Stepanski:

Thank you for your letter dated May 16, 2018, and for the opportunity to review and provide comment on the proposed I-94 (Edsel Ford Expressway) Modernization Project in Wayne County, MI.

We appreciate the information your agency has shared relative to the proposed work and location of the project.

Sincerely,

Earl Poleski
Executive Director

735 EAST MICHIGAN AVENUE • P.O. BOX 30044 • LANSING, MICHIGAN 48909
www.michigan.gov/mshda • 517-373-8370 • FAX 517-335-4797 • TOLL-FREE 855-MI-MSHDA (855-646-7432)

DRAFT MEETING MINUTES

Project Title: I-94 Modernization

MDOT JNs.: 122117

Ctrl Section: 82023, 82024, 82025 (I-94); 82111, 82112 (M-10); 82251, 82252 (I-75)

Meeting: Environmental Protection Agency (EPA) Coordination Meeting

Date/Time: **November 7, 2018; 10:00 am to 11:45 am**

Location: I-94 Project Office Detroit

Purpose: Provide a project overview presentation to EPA

Attendees: Kathy Kowal (EPA), Terry Stepanski (MDOT), Ralph Pauly, Ruth Hepfer, Ian Weibel (FHWA), Matt Simon, John Baldauf and Robert Fieldbinder (HNTB)

1. Michigan Department of Transportation (MDOT) and Owner's Representative Consultant (ORC) provided an I-94 Modernization Project overview to EPA. The presentation outline included:
    a. Introductions
    b. Project team
    c. Project History/Overview
    d. Review EPA's Comments on the I-94 SEIS NOI
    e. Supplemental EIS (SEIS) Overview
    f. Advanced Bridges Construction
    g. Questions/Next Steps
2. Project history and overview includes:
    a. Current schedule extends out to year 2037 for construction based on a Pay-As-You-Go or "PayGo" funding program that is shared with another MDOT mega project for the I-75 corridor. An alternate plan has been developed to reduce project completion by four years to 2033. This plan is currently being reviewed by MDOT's Revenue and Use Committee and it includes several large construction packages in the $400-500 million range. The first five-years of this alternate plan has already been approved with the out years to 2033 pending approval.
    b. With use of retaining walls, able to add an additional lane in each direction for I-94 while minimizing right-of-way parcel impacts given the extent of the improvement.
    c. Key modifications to the 2005 Recommended Alternative include increasing connectivity and using existing capacity of service drives instead of providing brand new continuous service drives. Prior to identifying the modifications, the project lacked public buy-in so changed our public outreach approach to obtain feedback and address comments, resulting in more public buy-in and less controversy.
    d. Feedback from transit agencies was that they would not utilize the proposed service drives in the 2005 Recommended Alternative.
    e. Project plan includes advanced bridge construction through environmental re-evaluations to address structures in critical condition. The SEIS is scheduled for completion in February 2020 after which final design can begin.
    f. The project cost estimate is $2.9 billion for the 2037 plan for the 6.7-mile corridor that includes 67 bridges.
    g. The project addresses hot spot crashes associated with narrow shoulders, lack of acceleration and deacceleration ramps and capacity issues.

3. EPA Question – Where does the project sit on transit? Response – The Regional Transit Authority (RTA) is looking at providing transit on surrounding arterials as an I-94 focused transit would not attract ridership. Rail/streetcar is provided on Woodward (M-1). In addition, wider median shoulders are provided on the proposed I-94 project as an option for future transit use.
4. EPA Question – Where is fill coming from to bring to grade? Response: The I-94 project will be primarily a cut project with the slopes taken out for retaining walls. There is another separate project on I-375 which will be a fill project.
5. Due to the lack of controversy and robust stakeholder engagement process in developing the proposed modifications for the Draft SEIS, MDOT/FHWA will be seeking a combined Final SEIS and ROD document. This approach will be declared in the Draft SEIS.
6. EPA Comment – Will review SEIS document as second set of eyes to FHWA before the public review period.
7. Active Transportation and Demand Management (ATDM) will be implemented prior to construction for the Freeway and arterials that include Michigan Avenue (US-12) and Gratiot Avenue (M-3). ATDM was not part of the approved FEIS and is covered through an categorical exclusion.
8. The City road network provides good alternate routes for traffic during construction. The heaviest ramp movements for the system interchanges will be maintained during construction. The detailed Engineering Report, completed in 2010, provides details about staging and traffic control. Full closure of I-94 is proposed for west of M-10, full closure or directional between M-10 and I-75, and part-width east of I-75.
9. FHWA Question – How extensive has the hazardous materials identification been? FHWA noted that there is a history of running into issues during construction resulting in significant costs. Response – High and medium risk areas have been identified and testing for plumes will be conducted during right-of-way acquisition.
10. MDOT/ORC enlisted community leaders to form the Local Advisory Committee/Governmental Advisory Committee (LAC/GAC). Team was receiving high amount of input in the Midtown area of the project but needed to identify groups and enlisted City Council members to help with reaching residents on the west and east sides.
11. EPA Comment – Experience with bio-swales and vegetative buffers is that they become neglected after five years. Some movement towards neighborhood/community taking ownership of maintenance. EPA has examples where neighborhoods pick the plantings that helps with buy-in for maintenance. Neighborhood groups move to enlist schools. MDOT added planters on some of the Advanced Bridges and have agreements in place with the City of Detroit to maintain. The City has set aside budget for this effort. **See Action.**
12. FHWA Question – As the 2005 Recommended Alternative proposed continuous one-way services drives, clarify proposed use of one-way and two-way service drives? Response: Generally, the service drives will remain two-way with select one-way areas near service interchanges. A two-way Harper will be extended to the west to Woodward so it parallels I-94 and will limit people hopping on/off the freeway as well as being a transit route.
13. FHWA Question – Asked about the status of the ramps at Forest recalling that with the 2005 Recommended Alternative, the ramps were removed with operation concerns. MDOT/ORC indicated that they are proposed to be included with modifications. Although there are some challenges with weaving, this access is important to the Detroit Medical Center District and meeting community needs.
14. FHWA Question – What is the status of pedestrian bridges? Response: One pedestrian only will remain at Malcolm between Conner and Barrett. The other remaining locations will be replaced by complete streets to carry both vehicles and pedestrians.

15. EPA Question – How are complete streets received? Response: They are well received by the communities and City of Detroit due to the increased safety and multi-modal experience.
16. In addition to complete streets conversions, MDOT/ORC has identified three community connector bridges that enhance the community and includes Conner Avenue, Second Avenue, and Cass Avenue.
17. EPA Comment – It will help to have the traffic analysis that supports reducing the current multi-lane bridges to accommodate the multi-use connections. Response: MDOT/ORC has conducted this analysis and supports this change to right-size the bridges. The City Planning Department and the City Traffic have been involved in these decisions and matches their City-wide grid.
18. EPA Question – What is the traffic calming needed on Harper in order to address the stakeholder comment on the speed of vehicles. MDOT/ORC indicates that this issue is not resolved but will but will address as the project moves forward.
19. Discussed EPA review of Draft SEIS from Feb 4 to Mar 4, 2019 and agreed that concurrent with FHWA is okay. **See Action.**
20. FHWA will forward Air Analysis report to EPA once submitted by ORC. EPA will not review the Noise Report, lacking expertise in that area. **See Action.**
21. FHWA Question – With new FAA regulations, any issues of concern? Response: Only issue so far required a permit for temporary cranes for construction of Gratiot, near City Airport.
22. MDOT/ORC confirmed that there was no other Agency response except FTA who indicated they did not have the resources for review.

ACTION ITEMS

Action Description	Deadline	Assigned To	Progress Notes
EPA examples of maintaining vegetative buffers	12/01/18	K. Kowal	EPA will forward examples of working with neighborhoods to maintain plantings.
EPA Review of Draft SEIS	02/04/19	J. Baldauf	ORC provide MDOT/FHWA Draft SEIS for concurrent review. FHWA will provide document to EPA for review.
FHWA forward Air Analysis to EPA	11/19/19	R. Pauly	EPA will review the Air Analysis once FHWA forwards the document.

Submitted by: Robert Fieldbinder, PE
Minutes Reviewed By: John Baldauf, PE, Matt Simon, PE
CC: *Distribution List, File*

This meeting summary is the understanding of items discussed, decisions reached and proposed actions. Please contact the Meeting Facilitator if there are changes or additions within five working days. If no changes or additions are received, this will be considered an accurate account of the meeting.