



Executive Summary

Draft Supplemental Environmental Impact Statement and Section 4(f) Evaluation

August 2019

Prepared for the

I-94 Modernization Project in Detroit from I-96 to Conner Avenue





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EXECUTIVE SUMMARY

The Michigan Department of Transportation (MDOT) and the Federal Highway Administration (FHWA) propose to modernize approximately 6.7 miles of interstate freeway (I-94) in the city of Detroit, Michigan between I-96 and Conner Avenue (Project). Improvements include adding a travel lane in each direction; modernizing system and service interchanges; reconstructing bridges crossing over the freeway; and changing existing service drives to maximize efficiencies of the connected local travel patterns. MDOT and FHWA are issuing this Draft Supplemental Environmental Impact Statement (DSEIS) as an update to an EIS with a Record of Decision (ROD) filed in 2005.

This Executive Summary is intended to briefly identify issues identified during Project development. It briefly describes the environmental review process to help the reader understand why a Supplemental Environmental Impact Statement (SEIS) is being prepared and how to participate in the process.

What is a Supplemental Environmental Impact Statement? Why is one being prepared for the I-94 Modernization Project?

The National Environmental Policy Act of 1969 (NEPA) requires that federal agencies prepare environmental impact statements (EISs) for major federal actions that could significantly affect the quality of the human environment. NEPA requires the EIS to analyze the social, economic, and natural environmental impacts of the proposed federal action (modernization of I-94) for decision-making and public information purposes.

The history of the I-94 Modernization environmental impact assessment reaches back to December 2004, when FHWA in 2004 approved a Final EIS (FEIS) for the rehabilitation of I-94. A Record of Decision (ROD) was published in 2005, which allowed MDOT to move forward with final design and construction activities. MDOT completed a detailed engineering report in 2010, which advanced the design to a point where it could be released for final design and construction.



What are 'ASA' and 'ASAM'?

The "Approved Selected Alternative" or **ASA** is the selected alternative described in the Project's 2005 ROD, which affirmed the 2004 FEIS recommended alternative.

The "Approved Selected Alternative with Modifications" or **ASAM** is a proposed modification to the ASA. MDOT has not yet approved or selected the ASAM, but it is the preferred alternative evaluated in this DSEIS.

After a formal public and agency review period and public hearing on the DSEIS, MDOT and FHWA will identify a recommended alternative in the FSEIS. Thirty days after the FSEIS is published, MDOT and FHWA will identify a selected alternative in an ROD.

In 2015, before beginning final design, MDOT hosted a series of public open houses in Detroit to obtain stakeholder feedback on the Project. Feedback from the public open houses included public and agency opposition with concerns focused largely on local neighborhood connectivity and property impacts. To address the stakeholder feedback, MDOT evaluated modifications to the 2004 FEIS's Approved Selected Alternative (ASA). The new plan, called the Approved Selected Alternative with Modifications (ASAM), increased connectivity without expanding the footprint of the freeway design and reduced Project impacts. MDOT presented the ASAM to the public in fall 2016 at a second round of open houses in Detroit. Throughout 2017 and 2018, MDOT refined the ASAM design to address various needs of the community, reduce environmental impacts, and increase safety. MDOT's public involvement program guided the design changes.

MDOT prepared this DSEIS and, like the 2004 FEIS, it covers the proposed I-94 Modernization Project from east of I-96 to east of Conner Avenue, in the city of Detroit, Wayne County, Michigan. It presents the Approved Selected Alternative with Modifications (ASAM) and relevant analyses. In its final form, the SEIS will address comments received during a public hearing process that includes a 45-day review period on the Project and this DSEIS. After circulating the DSEIS and considering the comments received from federal, state and local agencies, the public, and Project stakeholders, the FHWA may publish a Combined Final Supplemental Environmental Impact Statement and Record of Decision (Combined FSEIS and ROD) document – unless statutory criteria or practicability considerations preclude issuance of the combined document. If comments on the DSEIS are minor and responses to the comments are limited to factual corrections or explanations of why the comments do not warrant further response, the FHWA may instead issue an FSEIS Errata Sheet, in compliance with Section 1319(a) of the Moving Ahead for Progress in the 21st Century Act (MAP-21) (P.L. 112-141).

Other requirements related to the environmental review process are being considered in the DSEIS at the same time, including a Section 4(f) evaluation, Clean Air Act conformity, and a Section 106 historic property review.

Whom do I contact for Project information?

Project information, including an electronic version of this document, is available on the Project website at I94Detroit.org. Additional information concerning the Project may be obtained by contacting the MDOT Project Manager:

Terry Stepanski, P.E.
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(517) 241-0233

The Project also hosts the following social media sites:



facebook.com/i94detroit



twitter.com/i94detroit



What is 'Section 4(f)'?

The Department of Transportation Act of 1966, referenced in the DSEIS as "Section 4(f)," stipulates that FHWA and other DOT agencies cannot approve the use of land from publicly owned parks, recreation areas, wildlife and waterfowl refuges, or public and private historical sites unless there is no feasible and prudent avoidance alternative to the use of land.

Why is this Project happening?

Decision to reconsider

The DSEIS was prepared pursuant to Title 23, CFR, Part 771.130. It is intended to inform the public of substantial changes in the proposed action or substantial new circumstances or information as required by Section 1502.9(c)(1)). The DSEIS evaluates the findings of the 2004 FEIS and considers the impacts of changes and/or planned improvements to the Project for which the NEPA process had previously been completed.

This document also contains a Draft Section 4(f) Evaluation for the I-94 Rehabilitation Project. Section 4(f) of the Department of Transportation Act requires that an evaluation be prepared when the proposed action may have an adverse effect on a Section 4(f) property, which includes significant publicly owned public parks, recreation areas, wildlife and waterfowl refuges, or public or private historic sites on, or eligible for the National Register of Historic Places. The proposed action has been determined to have an adverse effect on properties that meet the criteria for listing on the National Register of Historic Places. A Memorandum of Agreement under Section 106 of the National Historic Preservation Act is also included in the DSEIS. Stipulations of the Section 106 agreement developed for the original EIS are still valid, and MDOT anticipates amendments will account for new adverse effects identified in the updated survey of the ASAM. Coordination with the Michigan State Historic Preservation Office (SHPO) is ongoing, and an amended, signed Memorandum of Agreement will be included in the Project's Combined FSEIS and ROD.

MDOT, in cooperation with FHWA prepared this document. Other federal and state agencies, local units of government, public interest groups, and individual citizens also supplied information contained in this SEIS.

Purpose and need

The purpose and need for the I-94 Modernization Project (Project) as described in the 2004 Final Environmental Impact Statement (2004 FEIS), has not changed. The 2004 FEIS can be found online at I94Detroit.org. The purpose of the proposed Project is to improve safety, capacity, local connectivity, and condition of the I-94 roadway, service drives, bridges, and interchanges between I-96 and Conner Avenue. The proposed Project improvements will be context sensitive to the greatest extent practicable and support the mobility needs of local, regional, and interstate commerce as well as national and civil defense in a way that integrates all modes of travel.

I-94 is vital to the local, regional, and international freight and passenger transportation system in Detroit. It serves major international border crossings and carries substantial amounts of local and regional traffic. As a result of neighborhood and stakeholder engagement, the need for local connectivity and walkability has come to the forefront. Information and data that was used in the 2004 FEIS as evidence of a need has been updated to ensure the needs are still relevant and reflect current conditions and updated plans.

I-94 improvements need to do the following:

- Update infrastructure to meet current design standards
- Address poor pavement and bridge conditions
- Address existing traffic congestion and provide for future travel demand
- Connect important routes in an effective and efficient manner
- Improve safety
- Provide improvements supporting multimodal transportation
- Contribute to an improving economy in Detroit
- Improve neighborhood connectivity across I-94 and along service drives to facilitate the use of the local road system for local traffic circulation

What is the proposed action, and what are the viable solutions to meet the Project's purpose?

Project limits

The Project limits (I-96 to Conner Avenue) have not changed, except in some areas where modifications are proposed, the construction limits may have been expanded or retracted (see **Figure 1**).

The Approved Selected Alternative with Modifications

The I-94 Modernization Project addresses the reconstruction of I-94 in Detroit from I-96 to Conner Avenue. The Project includes 67 bridges, multiple service interchanges, and two system interchanges at M-10 (Lodge) and I-75 (Chrysler). More details can be seen in the Project design drawings in Chapter 12 of the DSEIS.

Figure 1: Project Limits



No-Build Alternative

In the DSEIS, MDOT evaluates the possibility of taking no action. The Project's original EIS evaluated an alternative to do nothing (the No-Build Alternative) and an alternative that would only make safety improvements without capacity improvements (the Enhanced No-Build Alternative). These alternatives did not meet the purpose and need for the Project, so the Project dismissed them from further evaluation.

Cost estimates and funding

Table-1 shows the cost estimates for implementing the ASAM. These estimates are based on concept design quantities and unit prices. The Project would be funded with approximately 20% state and 80% federal funding. The ASAM addresses a variety of issues and benefits for the immediate community, the city of Detroit, Southeast Michigan, and the entire state.

Table-1: Cost Estimate of the Approved Selected Alternative with Modifications (2018 Dollars)

Activity	Cost (in Millions)
Construction	\$2,200
Right-of-Way	\$68
Design and Construction Engineering	\$558
Total	\$2,837

What are people's concerns with the Project? Is there controversy?

To study the potential effects of the Project, MDOT and FHWA completed various technical studies, and MDOT implemented a public involvement plan to solicit input from the public, agencies, and stakeholders. MDOT and FHWA discovered areas of controversy and identified ways to avoid, minimize and mitigate potential Project-related impacts. Chapter 7 and Appendix A of the DSEIS include information about public meetings and outreach efforts.

The DSEIS reviews the potential impacts to social, economic, and environmental resources in Chapter 4. Areas of controversy include potential impacts to the historic United Sound System Recording Studios; relocations of homes and businesses; capacity expansion on I-94; and local traffic circulation and multimodal connectivity. A comprehensive list of mitigation measures that address the potential impacts are found in Chapter 6 of the DSEIS. The following items are the most common topics of concern expressed by the public and agencies.

United Sound System Recording Studios

This building was identified as being eligible for listing on the National Register of Historic Places. In the original DEIS, the building was slated for demolition and mitigation for the loss was documented in a Memorandum of Agreement executed with the Michigan SHPO. At the time, the 2001 DEIS/2004 FEIS were published, the building was vacant; however, the building is once again a recording studio. The prospect of demolition now draws concern from community members, including people with an interest in the history of music in Detroit. Since the 2005 ROD, the property has been issued a historic plaque by the State of Michigan. Although it has not been placed on the National Register of Historic Places; the property remains eligible for listing on the register because of events that took place there.

To seek out alternatives to demolition, MDOT has conducted a detailed avoidance analysis and has concluded that avoiding the property by reducing the lanes widths in that area would unacceptably impact safety on the freeway while not fully addressing the potential risk of damage to the building during construction. The studios therefore cannot be avoided. MDOT is working with the SHPO to evaluate ways to preserve the building including the option to move it to the adjacent parking lot to the north to avoid conflicting with the I-94 construction. MDOT has purchased the property to facilitate saving the structure. Chapter 5 (the Section 4(f) Evaluation) and Appendix I in the DSEIS discuss the recording studios property. Potential mitigation measures for this and other historic property impacts will be developed in consultation with SHPO and will be included in the FSEIS.

Add a travel lane on I-94

Public comment questioned the need to add a travel lane in each direction on I-94. Comments were received that widening the highway to accommodate another lane in each direction would result in too many relocations. The relocations were not however a result of adding a travel lane to the mainline, rather resulted from the proposed



improvements to the service drives. Under the ASAM, the service drives have been redesigned and relocation impacts have been reduced substantially.

Comments received also opposed the proposed additional travel lane, asserting it is not warranted and it would only encourage additional traffic. As indicated in Section 1.4.3. of the DSEIS, the existing facility does not provide adequate capacity for existing traffic volumes or for future traffic volumes projected through 2040.

Improve connectivity

MDOT worked with stakeholders, including the city, to modify the Project in a way that enhances mobility and connectivity by incorporating “Complete Streets” concepts wherever practicable. Complete Streets accommodate all users of the transportation system, including pedestrians, bicyclists, handicapped and transit riders within the roadway space. The ASAM reinstates most of the bridges that were proposed for removal under the ASA. The planned changes to bridge connections over the freeways is summarized in **Table 2**, which lists the proposed new, converted, and removed bridge connections within the Project limits.

Table 2: Approved Selected Alternative with Modifications Changes to Bridges over Freeways

Freeway Crossed	Bridge	
RETAINED BRIDGE CONNECTIONS THE ASA ELIMINATED		
I-94	John R Street	
I-94	Beaubien Street	
I-94	Lucky Place/Moran Street	
I-75	Ferry Street	
M-10	Canfield Street (Pedestrian Bridge)	
M-10	Selden Street (Pedestrian Bridge)	
NEW BRIDGE CONNECTIONS		
I-94	Hastings Street	
I-94	Iron Belle Trail (Conner Avenue Interchange)	
I-75	Harper Avenue	
PEDESTRIAN BRIDGES CONVERTED TO COMPLETE STREET BRIDGES		Proposed Complete Street Bridge
I-94	Helen Street	Helen Street
I-94	Townsend Street	Sheridan Street
I-94	Seminole Street	Iroquois Street
I-94	Rohns Street	Rohns Street
I-94	Springfield Street	Lemay Street
M-10	Selden Street	Selden Street
M-10	Canfield Street	Calumet Street/Four Tops
M-10	Merrick Street	Merrick Street
M-10	Holden Street	Holden Street



Freeway Crossed	Bridge	
REMOVED BRIDGES (NOT REPLACED)		
		Reason for Removal
I-94	Brooklyn Street pedestrian bridge	To accommodate modernization of the I-94/M-10 interchange. Pedestrians accommodated at new Trumbull Avenue Complete Street bridge.
I-94	Third Avenue bridge	To accommodate modernization of the I-94/M-10 interchange. Traffic redirects to Second Street and Cass Avenue Complete Street bridges.
I-94	U-turn bridge west of Mt. Elliott Street	Replaced with upgraded bridges at Mt. Elliott Street and Lucky Place, and a new bridge at Harper Avenue.
I-94	McClellan Street	To accommodate modernization of the Gratiot Avenue interchange. Pedestrian and vehicular access accommodated at Gratiot Avenue and the proposed Rohns Street Complete Streets bridge.
I-75	Piquette Avenue	Replaced with a new bridge at Harper Avenue.
I-75	Former Conrail/Norfolk Southern Railroad bridges	Inactive railroad bridges no longer needed.

Local traffic circulation

The public voiced concern with how the ASA treated the service drives. MDOT received many comments critical of the proposed continuous service drives and associated property impacts; including from the city of Detroit, who announced their opposition to the Project in 2015. After receiving these comments, MDOT coordinated with the city of Detroit staff, residents, and stakeholders to better incorporate local transportation plans and stakeholder needs into the Project. The resulting modifications maximized the use of the existing city roadway network to improve local traffic circulation versus constructing new continuous service drives. The ASAM includes using the existing service drive network and converting traffic flow to two-way to improve circulation and access to adjacent neighborhoods. The conversion of the existing pedestrian bridges to Complete Streets bridges increases access between neighborhoods across I-94 and improves local traffic circulation around the I-94 freeway. New service drive connections are proposed at locations that reduce property impacts and enhance connectivity and local traffic circulation.

Relocations

The number of relocations required by the ASA was controversial and created public opposition to the Project. Comments focused on the ASA's proposed continuous service drives because they required substantial amounts of right-of-way and relocations. The impacts to the individual property owners as well as the whole community were noted areas of concern. The ASAM reduces the Project footprint by modifying the service drives, which reduces the number of relocations. The ASAM reduced the number of residential displacements 61.1%, from 18 to seven, and the number of business displacements 16.7%, from 24 to 20.

What would be the consequences of the Project?

Summary of potential impacts

The direct impacts of modernizing I-94 in Detroit are greater than the impacts of the No Build Alternative. However, the No Build Alternative would not address the purpose and need for the Project.

There are key differences between the impacts of the ASA and the ASAM. The ASAM modified the ASA to address concerns and issues brought up by the public and stakeholders about right-of-way impacts to connectivity, mobility, and neighborhood cohesiveness. The impacts were reassessed by resurveying and updating the inventories and analyses of noise, vibration, air quality, contamination, parks and recreation sites, archaeology and historic properties (see **Table 3**). To address right-of-way impacts, the footprint of the ASAM is smaller than the ASA and affects fewer residential and business properties. MDOT would need to acquire seven residential properties and 20 businesses to implement the ASAM. The ASAM has 61.1% fewer residential relocations and 16.7% fewer business relocations.

There are several historic properties where MDOT would require temporary easement or permanent right-of-way for transportation infrastructure (such as sidewalk reconstruction or to accommodate re-alignment of the ramps or service drives). In the updated studies, additional historic properties were identified that were not originally considered for the ASA but are now being addressed. MDOT would need to acquire six historic properties to construct the ASAM. The historic structures would be moved or demolished, resulting in adverse effects.

The ASAM will result in temporary impacts to seven parks totaling 0.55 acres, where sidewalks will be replaced. In addition, sidewalk improvements at Wayne State University's Athletic Campus will require less than one-tenth of an acre of permanent right-of-way. The Iron Belle Trail will be realigned through the Conner Avenue interchange and upgraded from an on-street facility to an off-street shared-use path on a new pedestrian/bicycle bridge over I-94. The new bridge would move nonmotorized traffic away from the vehicular traffic at the Conner Avenue interchange with I-94. This new trail would improve safety and connections to Conner Street Parkway and Chandler Park.

The Project's updated contamination survey found several properties were no longer sites of environmental concern, which reduced the number of properties of concern from 49 to 34 properties.

The Project's updated noise impact and abatement analysis (see the *Noise and Vibration Analysis Technical Memorandum – TM 48* in Appendix G of the DSEIS) identified noise impacts for the ASAM. One noise barrier is recommended on the north side of the I-94 off-ramp to northbound M-10 between Third Avenue and Holden Street that would be designed to mitigate the noise impact for residences along Third Avenue and Fourth Street. Noise abatement will be considered and implemented if it is found feasible and reasonable. Also, the viewpoint of the benefiting units must be generally positive for FHWA/MDOT to include the noise barrier in the Project. The decision to construct a noise barrier would be made during final design and the affected property owners will be included in the decision-making process.

The Project's updated air quality assessment did not identify air quality impacts from carbon monoxide (CO), fine particulate matter (PM_{2.5}), or Mobile Source Air Toxics; therefore, no measures to mitigate air quality impacts are identified.

Construction activities would have temporary impacts such as noise, dust, erosion, and traffic disruptions. MDOT will use mitigation measures to control, minimize or mitigate impacts. By controlling these impacts, the effects on water quality, disruptions to everyday travel and quality of life of people who live, work and commute through the construction zones will be reduced. Mitigation measures are standard MDOT construction practices, but they will be



tailored to the Project and will be coordinated with the local community (see DSEIS Section 6.13, the Draft Project Mitigation Summary “Green Sheet”).

Table 3 summarizes the impacts of the original EIS’s selected alternative versus the modified alternative that the DSEIS evaluates.

Table 3: Impact Summary Table

Impact	No Build	Original ASA	ASAM
Park impacts (acres of right-of-way)	0	Undefined*	0.551 (temp) 0.098 (perm)
Residential displacements	0	18	7
Business displacements	0	24	20
Adverse effects to historic properties	0	4	6**
Environmental justice populations (low-income and minority) affected	Yes	Yes	Yes
Air quality permit required	No	No	No
Noise barriers recommended	0	3	1
Potential contaminated sites (sites recommended for further testing)	0	49	34

* The 2004 EIS did not define some impacts; they are included here to identify the ASAM impacts.

** The four properties impacted by the ASA continue to be impacted by the ASAM. Updated historic surveys identified two properties that were previously found ineligible for the National Register of Historic Places that are now deemed eligible.

Are there unresolved issues associated with the Project? How will these issues be resolved?

Section 106 Memorandum of Agreement

Before FHWA makes a final decision about the Project, FHWA and MDOT must complete an evaluation of potential Project-related impacts to historic resources. An existing Memorandum of Agreement between the Michigan SHPO and FHWA/MDOT will be amended to reflect additional adverse effects and any changes to existing mitigation commitments. If additional properties are identified as historic and eligible for the National Register of Historic Places, MDOT will continue to coordinate with the Michigan SHPO to analyze the effects.

What are the major conclusions of the Draft Supplemental Environmental Impact Statement?

Preferred Alternative is the ASAM

The DSEIS identifies the ASAM as the preferred alternative. This alternative minimizes or eliminates the relocation and right-of-way impacts associated with the ASA. The DSEIS also proposed mitigation measures to minimize and mitigate unavoidable negative impacts.

What happens next?

Circulation of Draft Supplemental Environmental Impact Statement for comments

A Notice of Availability (NOA) for the DSEIS is advertised in the *Federal Register* establishing a public review and comment period of not fewer than 45 days nor more than 60 days. MDOT advertises and circulates the DSEIS and Section 4(f) Evaluation to the public and agencies for a 45-day review period.

Prepare and circulate a Combined Final Supplemental Environmental Impact Statement and Record of Decision

After the conclusion of the 45-day review period and public hearing on the DSEIS, FHWA and MDOT will consider and respond to received comments in a Combined FSEIS and ROD/Section 4(f) Evaluation. If comments on the DSEIS are minor, and responses to those comments would be limited to factual corrections or explanations of why the comments do not warrant further response, the FHWA may issue errata sheets instead of rewriting the DSEIS, in compliance with Section 1319(a) of MAP-21.